



Non-Discrimination & Anti-Harassment Policy

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1. Introduction

Enfinity Global Group (“Enfinity”) is committed to providing a safe and inclusive work environment in which all individuals are treated with respect and dignity. Enfinity prohibits discrimination or harassment against anyone based on race, color, religion, national or ethnic origin, ancestry, sex (including pregnancy and related conditions), gender (including gender identity and expression), sexual orientation, marital status, genetic information, age, disability, military and veteran status or any other characteristic protected by law.

This Non-Discrimination & Anti-Harassment Policy (“Policy”) describes Enfinity internal requirements intended to create a work environment free from unlawful discrimination or harassment.

2. Scope

Enfinity seeks to uphold the highest integrity standards across the company regardless of location, therefore this Policy is applicable to all Enfinity employees (at all levels), officers, directors, contractors or any persons who act on behalf of Enfinity (or otherwise work for Enfinity, regardless of the type of contractual relationship with Enfinity, and whether permanent or temporary) (each, an “Enfinity Professional” or “Professional”). We also do not tolerate discriminatory, harassing, or retaliatory conduct by non-employees and other third parties when performing duties for or providing services to Enfinity. This Policy covers incidents that happen at the physical office, in the virtual workspace, in text services, on business trips, and in any other Enfinity-related context. Incidents that occur outside an Enfinity context that may have an impact on the working environment are also subject to this Policy.

3. What to know

3.1 Non-Discrimination

Enfinity is an equal opportunity employer and makes all employment decisions based on legitimate business considerations, such as experience, skills, education, performance, and the Enfinity core values. Enfinity does not tolerate any form of discrimination. Prohibited forms of discrimination include the adverse treatment of any Enfinity Professional based on the Professional’s actual or perceived membership in a protected class or category of persons to whom he/she belongs, rather than based on his/her individual merit with respect to the terms, conditions, or privileges of employment including, but not limited to hiring, firing, promoting, disciplining, scheduling, training, evaluating, or deciding how to compensate that Professional.

3.2 Anti-Harassment

Enfinity has zero tolerance for all forms of sexual harassment including but not limited to unwelcome sexual advances, requests for sexual favors, and other verbal, visual or physical acts of a sexual nature. Similarly, conduct that has the purpose or effect of interfering with a Professional’s work performance in an unreasonable way or creating an intimidating, hostile, or offensive work environment are prohibited. Examples of prohibited conduct include:

- **Verbal:** Sexual innuendo, sexually suggestive comments, jokes of a sexual nature, unwanted sexual advances or propositions, implicit or explicit offers of employment benefits or favorable terms and conditions of employment in

exchange for sexual favors, threatened or actual reprisals after rejection of sexual advances, graphic commentaries about a person's body.

- **Non-Verbal:** Leering, obscene gestures, sexually suggestive objects or pictures, cartoons or posters, suggestive or insulting sounds, suggestive or obscene notes or letters or electronic communications.
- **Physical:** Unwanted physical contact of a sexual nature, including sexually suggestive or offensive touching, impeding or blocking movement or brushing up against the body.

Enfinity also prohibits all other forms of harassment including physical intimidation, bullying and verbal abuse. There is simply no place for these prohibited behaviors in our collaborative, high-integrity work environment. In summary, Enfinity Professionals should always treat each other with respect as colleagues no matter the situation.

4. How to comply

4.1 Professionals

Enfinity Professionals play a key role in creating and maintaining Enfinity's safe, fair, and respectful work environment. All Professionals must:

- Treat Professionals, applicants, customers, suppliers, contractors, anyone you interact with or anyone providing services to Enfinity with fairness and respect.
- Create and foster a work environment free from discrimination, bullying and harassment.
- Do not refuse to work or cooperate with others because of protected characteristics.
- Never make an unwelcome sexual advance to anyone you interact with.
- Ensure that third parties such as customers, contractors, and suppliers who are present on Enfinity property always abide by this Policy.
- Report incidents of discrimination or harassment.
- Cooperate in internal investigations.
- Maintain confidentiality of investigation process.

4.2 Managers

All Enfinity managers have additional responsibilities to:

- Ensure your team understands this Non-Discrimination & Anti-Harassment Policy.
- Be a role model for non-discrimination & anti-harassment.
- Create inclusive teams where our Professionals are respected and valued.

- Escalate incidents or allegations of discrimination or harassment to Enfinity HR team.

5. Complaint process

Enfinity takes seriously any allegation of discrimination, sexual harassment, or other harassment. Below is a brief description of the Enfinity complaint process:

- All complaints are kept confidential (to the extent possible) and investigated thoroughly by qualified personnel in a timely, fair and impartial manner.
- Any Professional who feels he or she has been subjected to harassment, discriminated against or retaliated against, or who feels he or she has witnessed any of the foregoing, should report such incidents immediately through one of the following channels unless local law requires a different process:
 - Direct manager.
 - Human resources.
 - Legal.
 - Concern Reporting Email: complaint@enfinity.global.
- Please include the following information in your complaint report:
 - Identify individuals involved.
 - Provide time period during which events occurred.
 - Include documentation supporting the concern/complaint, if possible.
 - Provide any other relevant information that may be helpful to the investigation.

REMEMBER: You may choose to remain anonymous. Enfinity will thoroughly and professionally investigate all concerns raised whether anonymous or not.

6. No retaliation

Professionals can confidently and safely raise their concerns under this Policy. We absolutely prohibit retaliation against anyone for:

- Raising a good faith concern under this Policy.
- Opposing conduct in the workplace prohibited by this Policy.
- Participating in any investigation of conduct in the workplace prohibited by this Policy (either by Enfinity or by a government agency).
- Asserting rights under this Policy.

7. Disciplinary actions

Enfinity does not tolerate violation of this Policy or applicable laws. Any such violation will result in appropriate disciplinary action, which, depending on the circumstances, may include termination of employment and/or service agreement. The Supervisory Body shall monitor investigations of all reported violations of this Policy and all disciplinary actions.

8. Approval; Amendment of Policy

If any applicable laws or regulations impose stricter requirements than those set forth in this Policy, such stricter regulations shall be applied, and any violation of such regulations will also be considered a violation of Enfinity's Compliance Policies.

This Policy has been approved by the Supervisory Body.

This Policy is an internal document of the Enfinity Global Group. It has been adopted on behalf of Enfinity for its sole use and benefit. This Policy shall be administered on behalf of Enfinity by the Supervisory Body.

There are no other parties who have any right to rely on the terms of this Policy, nor do any other parties have the right to enforce the terms of this Policy. None of Enfinity, any member of Enfinity, nor any officer, director, employee, agent, or affiliate of any of the foregoing, shall be required to account to, or otherwise inform or notify, any other parties with respect to the matters described in this Policy.

The Supervisory Body shall have the sole and exclusive right and duty to construe and interpret the terms of this Policy, and all such constructions, interpretations and decisions by the Supervisory Body shall be final and binding on all persons and entities whatsoever.

The Supervisory Body shall have the sole and exclusive right to amend, waive, terminate, or otherwise modify the terms of this document, with respect to any specific case or generally.

9. Limited purpose of this document

This Policy shall not be deemed to confer any rights of employment or continued employment with Enfinity, nor shall it interfere in any way with Enfinity's right to terminate the employment of any Professional at any time, for any reason, with or without cause, and with or without notice, except as otherwise stated within other terms of employment provided in writing to any such Professional. Similarly, this Policy shall not interfere with Enfinity's right to evaluate Professionals based on their performance or other factors and make to any adjustments to a Professional's compensation, title or duties as a result of any such performance evaluation or other factors, as determined by Enfinity.

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