



Anti-Harassment and Non-Discrimination Policy

1. Non-Discrimination and Equal Opportunities.

As an employer committed to providing equal opportunities and in accordance with the Constitution of the Republic, which in Article 11 outlines principles for the application of rights stating, "No one may be discriminated against on grounds of ethnicity, place of birth, age, sex, gender identity, cultural identity, marital status, language, religion, ideology, political affiliation, judicial history, socio-economic status, migratory status, sexual orientation, health status, HIV status, disability, or physical difference; nor for any other personal or collective, temporary or permanent distinction that aims to undermine or nullify the recognition, enjoyment, or exercise of rights." Both the law and Ecuador Galápagos Travel will sanction, as appropriate, any form of discrimination.

This policy applies to all areas of the company, including recruitment, tests, selections, hiring, training, updates, transfers, promotions, rehiring, payment rates, internships, demotions, terminations, disciplinary sanctions, dismissals, compensations, benefits, and other privileges, terms, and conditions of employment. This policy, along with the Constitution of the Republic of Ecuador, prohibits and penalizes discrimination in employment against any employed person or applicant based on any condition.

2. Anti-Harassment

Responsible Travel provides a workplace free from any type of harassment, discrimination, and retaliation. Ecuador Galápagos Travel categorically prohibits the harassment of employees in the workplace based on race, color, religion, sex (including all situations related to pregnancy, childbirth, or breastfeeding), sexual stereotypes (including presumptions about a person's appearance or behavior, expression, or gender identity), country of origin, age, any physical or mental disability, ancestry, illnesses, marital status, citizenship, sexual orientation, genetic information, or any other classification protected by applicable Ecuadorian laws. Therefore, Ecuador Galápagos Travel will provide a harassment-free environment and will not tolerate any form of harassment that violates this policy.

The Organic Law Reforming the Organic Law of Public Service and the Labor Code to Prevent Workplace Harassment, along with the Anti-Harassment Policy of Ecuador Galápagos Travel, prohibit any employee, supervisor, director, client, vendor, supplier, or any third party associated with an employee or the company for business matters, from harassing, discriminating, or retaliating against any employed person, applicant, contractor, intern, or volunteer of the company, based on any condition or activity protected by Ecuadorian law.

The Anti-Harassment Policy also prohibits offensive behavior, sexual harassment, or any type of harassment, including:

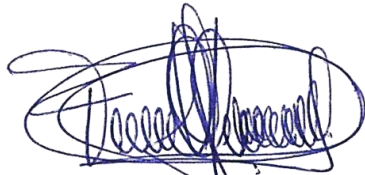
a) Verbal expressions: such as epithets, derogatory or offensive jokes, negative stereotypes, slurs, insinuations, or comments about age, race, disability, country of origin, beliefs or religious practices, unwelcome sexual insults or insinuations.:

- a) **Verbal expressions:** such as epithets, derogatory or offensive jokes, negative stereotypes, slurs, insinuations, or comments about age, race, disability, country of origin, beliefs or religious practices, unwelcome sexual insults or insinuations.
- b) **Sexual conduct or exhibition:** such as leering, derogatory or sexually oriented signs, photographs, cartoons, drawings, calendars, graffiti, emails, gestures, or any visual expression that may arise.
- c) **Physical conduct:** such as intimidating acts, unwanted or offensive touching, intentional interference with normal movements, or interference with work on the basis of sex, race, or other protected characteristics.
- d) **Threats, demands, or expectations:** submitting to sexual requests as a condition for employment or preferential treatment.
- e) **Retaliation:** such as reporting or threatening to report harassment or discrimination.

Gender-based or any type of sexual harassment is also prohibited under this policy, regardless of whether the harasser and the harassed are of the same gender or different genders or if it reaches the level of legal violation. Examples of gender-based harassment prohibited by this policy include: offensive verbal sexual jokes, flirting, unwelcome and repeated sexual propositions, verbal abuse of a sexual nature, explicit or degrading comments about an individual's

appearance or sexual activity, offensive visual conduct, including leering, sexual gestures, display of sexually suggestive and offensive objects or images, cartoons, or posters, unwanted pressure for sexual activities, offensive or obscene letters, notes, or invitations, offensive physical contact such as patting, pinching, or brushing against another person's body, sexual favoritism, or any act that the company and the victim interpret as harassment.

No employee, regardless of their position in the company, is exempt from complying with and implementing this policy. Any act of alleged discrimination, harassment, retaliation, or other behaviors contrary to this policy must be immediately reported by employees or higher-ranking personnel to the Human Resources department for the respective follow-up and investigation.

A handwritten signature in blue ink, appearing to read "Flor María Gaona", is written over a horizontal line. The signature is highly stylized and cursive.

Flor María Gaona
General Manager