



Wilson, Sons

**DIVERSITY, EQUITY AND INCLUSION POLICY
OF WILSON SONS S.A.**

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DIVERSITY, EQUITY AND INCLUSION POLICY

1. INTRODUCTION

The Diversity, Equity and Inclusion Policy reaffirms Wilson Sons' connection with society and its purpose of transforming realities and delivering a better future.

The company always operates in accordance with the law, which uphold human rights and the environment, and which value our employees and their unique qualities, by promoting ethical, transparent, and responsible actions.

2. OBJECTIVE

To establish guidelines and commitments regarding Diversity, Equity and Inclusion (DEI), ensuring the respect, inclusion, dignity, and fair treatment of all individuals in Wilson Sons. Additionally, the DEI Policy aims to increase engagement, retain talent, foster continuous improvement in the organisation, and create a more creative and innovative environment through diverse perspectives and experiences.

3. SCOPE

This instrument applies to all Wilson Sons employees, including leaders (supervisors, coordinators, specialists, managers, consultants, and directors), administrative, maritime, and operational functions, interns and apprentices of the Wilson Sons company, Directors and members of the Fiscal Council, Board, and Advisory Committee of Wilson Sons. Therefore, all these mentioned roles uphold and multiply the conduct advocated in this Policy.

In addition to these, the guidelines set out here apply to customers, fixed or temporary outsourced labour, supply chain, and other partnerships. It is expected that these stakeholders advocate and act accordingly to prevent non-compliance.

4. GUIDELINES

As established in the Code of Ethical Conduct and reported in the company's Sustainability Report, Wilson Sons supports diversity, inclusion, and the fight against all forms of discrimination. The company is committed to respecting human rights in its operations and to offering an inclusive environment, in accordance with the following principles:

- **Institutional commitment:** respecting and valuing individual differences to promote diversity and combat all forms of prejudice;
- **Human Rights:** supporting the construction of a fairer and more sustainable society, committing to respect and promote human rights;
- **Engaged leadership:** having a committed leadership, who makes decisions in view of this Policy and promotes inclusive environments, developing and managing diverse teams, regardless of the area of the organisation; and
- **Transparency:** acting transparently as well as communicating assertively and objectively our advancements in the subject.

5. POSITIONING

At Wilson Sons, we utilise our power of transformation to make the port and maritime infrastructure segment more inclusive, contributing to building a Brazil with more opportunities for all people.

6. COMMITMENTS

- To promote a diversity-valuing culture that is recognised and practised by the internal audience by respecting and including different individuals, with the leadership's protagonism and engagement in promoting psychologically safe environments and equal opportunities for all people;
- To impede discriminatory actions, processes, criteria, and treatments motivated by gender, race, ethnicity, sexual orientation, religion, age, physical shape, condition, marital status, origin, socioeconomic class, political conviction, and other ways of being and thinking. Any violations of this Policy will be considered violations of the Wilson Sons Code of Conduct and are subject to the sanctions provided for in the said document;
- To adapt and restructure processes related to people management so that they are more inclusive, free of bias, and can provide decision making based on the appreciation of our talent and skills; and
- To continuously educate and raise awareness among internal and outsourced staff, suppliers, customers, and communities regarding diversity and inclusion, so that the network can be receptive to all individuals, providing a sense of belonging and collaboration.

7. ROLES AND RESPONSIBILITIES

7.1. Executive Board

- I. To support, deliberate, and ensure the implementation of initiatives; to encourage the development of leaders that are sensitive to the topic;
- II. To approve the company's DEI Policy and any eventual changes to it;

7.2. Wilson Sons Leadership

- I. To promote a diverse, fair, and inclusive organisational environment that combats all forms of discrimination, valuing the uniqueness of the staff and stakeholders;
- II. To influence people, through their own example, to develop a respectful, fair, and inclusive environment;
- III. To make decisions based on objective facts, free from biases, and take a stance in adverse situations;

7.3. Human Resources

- I. To be responsible for the company's DEI Policy, ensuring its proper dissemination and updates when necessary.
- II. To enable the practice of inclusive internal processes throughout the company, encompassing the hiring, development, recognition, attraction and retention of diverse individuals with various characteristics.

7.4. Sustainability

- I. To consider and integrate these principles when relevant for sustainability initiatives within the organisation.

7.5. Internal Controls

- I. To monitor the revision date of this normative document and, whenever necessary, to support the revision process in collaboration with the human resources department.
- II. To test the established controls, assessing their effectiveness in reducing the risks of non-documentary compliance (impact and probability).

7.6. Corporate Audit

- III. To ensure compliance with this normative document.

8. GLOSSARY

- **Human rights:** Refers to all the rights related to ensuring a dignified life for all individuals. They are norms that recognise and protect the dignity of all human beings.
- **Diversity:** Refers to the social and cultural plurality within a group of people, including aspects such as race, ethnicity, age, gender, gender identity, sexual orientation, religion, culture, physical condition, marital status, educational background, among others.
- **Equity:** Refers to recognising and treating inequalities fairly, aiming to provide equal opportunities to everyone.
- **Inclusion:** Refers to removing barriers, intolerance, and discrimination in order to promote a safe, healthy, welcoming, respectful, fair, and collaborative environment where all individuals feel comfortable to contribute and participate. It ensures equal access to opportunities and resources, allowing everyone to contribute fully to the success of the organisation.
- **Stakeholders:** Refers to all parties with an interest in or affected by the organisation, including customers, investors, suppliers, partners, employees, government, civil society, service providers, and non-governmental organisations.

9. ATTACHMENTS AND REFERENCES

9.1. References

- [Code of Ethical Conduct](#)
- [Anti-Corruption Guide](#)
- [Sustainability Report](#)

10. DISCIPLINARY SANCTIONS

The [Ethics Channel](#) should be used for any type of complaint that violates this Policy and/or other policies, procedures, and regulations of the company.

10.1. The non-compliance with this Policy is subject to disciplinary sanctions. Possible disciplinary measures include:

- Verbal warning;
- Written warning;
- Suspension; and
- Just cause termination.



10.2. Sanctions must be fair, reasonable, and proportionate to the offence committed.

11. VALIDITY AND DOCUMENT REVIEW

This Policy document comes into effect from the date of its publication and will be made available to all employees. The review of this document should be conducted every 3 (three) years from the date of its publication, or whenever there is a significant change.

Validity: May 2026

Approved by: Executive Board