

Gender Equality Policy of the Línea Directa Aseguradora Group



linea directa

Name of policy	Gender Equality Policy
Related section of the Code of Ethics	VI.1 Human rights and civil liberties VI.2 Respect, dignity and non-discrimination
Related section of other policies	Section 4 of the Diversity and Inclusion Policy <i>Inclusión Responsable Commitments and Practices</i>
Rules and standards superseded	-
Related rules and standards	Code of Ethics, Human Rights Policy, Director Selection Policy, Internal Selection Policy, Diversity and Inclusion Policy, Right to Disconnect Policy, Supplier Code of Conduct, Equality Plan, Prevention and Action Protocol for Psychosocial Risks
Business unit or function affected	The entire Línea Directa Aseguradora Group
Personnel affected	The entire Línea Directa Aseguradora Group
Main person responsible for monitoring	People & Internal Communication
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Created by	People & Internal Communication, Compliance & Corporate Governance
Approved by	Board of Directors of Línea Directa Aseguradora S.A.

GENDER EQUALITY POLICY

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1. INTRODUCTION

Equality between men and women is a fundamental and universal principle enshrined in international treaties on human rights.

Línea Directa Aseguradora S.A. (hereinafter, "Linea Directa" or the "Company") is aware that its business management must reflect the needs and demands of today's society and comply with the law on such matters, particularly *Royal Decree Law 6/2019, on urgent measures to ensure equal treatment and opportunities among men and women at work*, as well as its implementing rules and regulations, especially those relating to equal pay for equal work.

The Company also respects the provisions of Spanish Law 11/2018, on non-financial reporting and diversity, and observes the recommendations set out in the Code of Good Governance of Listed Companies of the Spanish Securities Market Regulator (CNMV) in order to foster these important concerns.

Línea Directa has drawn up this Gender Equality Policy in accordance with best national and international practices and with the principles enshrined in the *EU Gender Equality Strategy 2020-2025 and the various EU Directives that champion this principle of equal opportunities between men and women*.

Línea Directa has also considered the Sustainable Development Goals (SDGs) of the United Nations, specifically #5, "Gender Equality" and #8 "Decent Work and Economic Growth".

2. PRINCIPLES OF ACTION

Línea Directa fosters healthy relations in the workplace through a firm commitment to equal opportunities, non-discrimination and respect for diversity. For the Company, gender equality is an essential value and a differentiating element that transverses all facets of people management across the organisation.

With this goal in sight, the Board of Directors of Línea Directa Aseguradora S.A. has approved this *Gender Equality Policy* to govern all actions and activities at Línea Directa.

This Gender Equality Policy, together with the Equality Plan, provides a framework for action in pursuit of equality targeting all stakeholders. It is rooted in the Company's core values and serves as a mandatory guide steering all conduct and business activities.

This Policy is inspired by the following principles and courses of action, among others:

- *Championing equal opportunities through the commitment of Senior Management*, and through models to attract and retain talent regardless of gender at the Company.
- *Ensuring the transparent dissemination of this Policy and related documents throughout the organisation*, with the aim of raising awareness of gender equality across all levels and echelons.
- *Fostering a culture of flexibility at Línea Directa*, so that all employees, regardless of gender, can enjoy a healthy work life balance and job quality.

In short, these principles and courses of action are there to promote and consolidate a culture of respect for all people at Línea Directa and behaviour that is conducive to equal opportunities across all spheres of the organisation.

3. SCOPE

The principles set out in this document apply to all employees, managers and directors of all companies that make up the Línea Directa Aseguradora Group, as well as the Línea Directa Foundation, in accordance with applicable law and regulations. The Company shall also seek to ensure that its collaborators, partners and any other persons related to its operations, products and services likewise honour the principles and commitments contained in this Policy.

4. COMMITMENTS AND RESPONSIBLE PRACTICES

The commitments and responsibilities undertaken by Línea Directa by virtue of this Policy are supplemented by the following internal documents: Code of Ethics, Human Rights Policy, Diversity and Inclusion Policy, Internal Selection Policy, Right to Disconnect Policy, Sustainability Policy, Social Contribution Policy, Equality Plan, Protocol on the Prevention of Psychosocial Risks and Supplier Code of Conduct, among others.

Línea Directa also has a Selection and Succession Policy for the members of its Board of Directors. This particular policy seeks diversity of gender and experience in the composition of this governing body, as per the recommendations of the Good Governance Code of Listed Companies of the CNMV and respecting the values of the EU General Equality Strategy 2020-2025 to achieve a genuine gender balance in decision-making.

To accomplish its objectives in terms of gender equality and in line with the recommendations of the Technical Equality Team, Línea Directa shall promote the commitments and practices set out in this Policy, which, together with

applicable law and regulations, will govern and steer its actions in the realm of labour relations. These commitments and practices include:

- ***Developing the principle of equal opportunities*** by adopting measures and taking action to achieve equal treatment and opportunities among all employees and, furthermore, to avoid situations of direct or indirect discrimination across all levels of the organisation.
- ***Fostering initiatives that seek to raise the awareness*** needed to nurture genderless talent within the organisation, particularly through people who manage teams.
- ***Ensuring that the principle of equal opportunities is present across all talent management processes*** at the Company, including the processes of attracting, retaining and nurturing talent and professional development, and genderless talent assessment that focuses on merit and aptitude alone.
- ***Ensuring equal and transparent remuneration*** by setting objective criteria for setting remuneration and steadily progressing towards greater wage transparency. Linea Directa shall carry out periodic actions to measure the pay gap, using methodologies in line with national and European requirements in this realm. It shall also draw up an action plan with corrective measures as and when needed.
- ***Fostering a healthy work life balance*** within a culture of flexibility based on trust and responsibility, integrating flexible working models, teleworking arrangements, part-time work and customised working hours and honouring the right to disconnect.
- ***Ensuring job quality*** regardless of gender, promoting stable work that guarantees the self-improvement of employees as a core aspect underpinning gender equality.

- ***Analysing positive action*** to correct inequalities if and when these are detected and enabling the less represented gender to access positions of responsibility.
- ***Aiding in the fight against gender-based violence*** through specific programmes that include prevention, protection, support and information measures for victims of gender-based violence.
- ***Promoting gender equality along the value chain***. Aside from the requirements contained in the Supplier Code of Conduct, the Company shall positively seek to deal only with suppliers that have internal or distinctive measures in place to help ensure a healthy work-life balance and gender equality and that comply with the terms of this Policy.
- ***Conveying*** the principles that inspire this Policy to stakeholders and society at large and projecting Línea Directa's commitment to equal opportunities outwards through external communication initiatives and/or commercial action.

Línea Directa aims to adopt specific measures to ensure gender equality along its value chain, thus enabling it to improve its results and become more competitive by nurturing talent without gender bias, enabling the less represented gender to occupy senior management roles and access positions of responsibility under equal conditions, and paying close attention to possible deviations in the wage gap so that corrective action can be taken.

5. MANAGEMENT MODEL

Línea Directa guarantees the existence of communication and whistleblower channels, both *internal* (employee channel, ethics channel) and *external* (through specialised companies) so as to ensure that the Company is made aware of any action that infringes its position and status as a diverse company.

The equality principles enshrined in this Policy will be managed through a raft of internal codes, plans, policies and protocols and will be regularly assessed and reviewed by the Equality Unit, and through external audits and other

certification and assurance processes. Línea Directa also expresses its absolute commitment to equality by adhering to codes of good practice and initiatives focused on talent management regardless of gender.

6. GOVERNANCE MODEL AND MONITORING

The Equality Unit, led by the Equality Officer, shall review this Policy once a year and shall propose any necessary amendments, although compliance with this Policy will be continuously monitored. The unit shall also periodically analyse all necessary indicators to ensure that this Policy is fit for purpose.

Any substantial change to this document must be approved by the Board of Directors of Línea Directa Aseguradora S.A.

This Policy is complemented by other Company plans, codes and policies that relate directly to the principles of action contained herein.

7. COMMUNICATION OF THE POLICY

This Policy will be communicated to all Group members and employees and will be made available to stakeholders via the Intranet and on the corporate website.

This Policy will be effective from date of publication.

This Policy was approved by the Board of Directors of Línea Directa Aseguradora S.A. on 15 October 2020.