

I EQUALITY PLAN OF TWILIO SPAIN, S.L.

10/02/2023 – 09/02/2027

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1. INTRODUCTION

The principle of equality is recognised both internationally and in our own state legislation. Specifically, Article 14 of the Spanish Constitution establishes the right to equality and non-discrimination on the grounds of birth, sex, religion, opinion or any other personal or social condition or circumstance.

Likewise, Organic Law 3/2007, of 22 March, for the effective equality of women and men aims to make effective the right to equal treatment and opportunities between women and men, which obliges companies to implement measures to avoid situations of discrimination in the workplace.

More recently, Royal Decree-Law 6/2019 of 1 March, as well as Royal Decree-Law 901/2020 and Royal Decree-Law 902/2020, both of 13 October, increase the level of legal requirements, extending the scope of application according to the number of workers in the company, while incorporating negotiation criteria and the obligation to register and deposit equality plans, as well as the preparation of salary audits for the diagnosis of the Equality Plan.

A) TWILIO'S COMMITMENT

Twilio Spain, SL (hereinafter, “**Twilio**”, the “**Company**” or the “**Organization**”) is a company fully committed to the society in which it has been performing its work and the principle of equal opportunity, between women and men, working every day to build a diverse and equitable workplace.

At Twilio, diversity, equity and inclusion (DEI) is intertwined with our core values. We've developed a strategy based on the principles of anti-racism with the goal of actively identifying and eliminating all forms of racism, oppression, and bias in the workplace. Though the term “anti-racism” is most widely used in the United States and specifically refers to race, Chief Diversity Officer Lybra S. Clemons speaks of something quite universal: the necessity of ongoing action to challenge and redistribute power. In this sense, the work of diversity, equity, and inclusion requires an intentional, moment-by-moment action without a finite endpoint, and it requires this on a global scale.

“We believe anti-racism will enable us to both broaden and deepen our DEI work. We will take the principles of anti-racism and extend them to serve other underrepresented communities”.

Twilio works daily to eliminate biases in workplaces through some basic principles of action:

- Hire, promote and retain people with diverse identities and experiences.
- Examine and eliminate bias in our decision-making.
- Create an inclusive culture where everyone feels welcome.
- Intentionally prioritize equity - at all levels of the company.

- Make reasonable accommodations for those who experience disabilities, beliefs or religious practices.
- Prohibit harassment, discrimination and retaliation.

Unlawful discrimination or harassment on the basis of race, color, religion, veteran status, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation, or any other characteristics protected under applicable federal, state or local laws where Twilio has a presence is strictly prohibited.

The diversity, equity, and inclusion strategy of the parent company includes the following objectives by area:

1.Rethinking representation	1.1. Attract talent to retain	Hiring people with diverse backgrounds doesn't make any sense if you don't know how to retain them.
	1.2. Drive equity	Improving fair promotion and reward is an annual goal.
	1.3. Create a culture of inclusion	Improve inclusion results annually across all teams.
2. Using data to move	2.1. Drive change by being specific.	Use the metrics to act, beyond simply reporting.
	2.2. Drive accountability by being transparent.	Report on diversity, equity and inclusion data throughout the employee lifecycle.

Twilio is firmly committed to the principle of equal treatment between men and women, and will establish the necessary means to guarantee the implementation and monitoring of the measures articulated in the Equality Plan. Twilio will facilitate the material, economic, and personal changes to deliver the commitment to diversity and inclusion that is already part of the Company's own DNA and strategy.

Likewise, Twilio undertakes to:

- Promote the Equality Plan, integrating it into the Company's strategy.

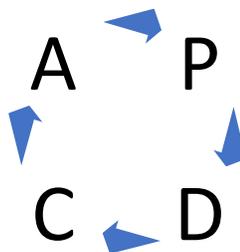
- Facilitate the creation, if necessary, of work commissions for the development of the measures included in this Equality Plan or to ensure the achievement of the objectives of the Plan.
- Reinforce internal and external communication making visible the commitment acquired with equal opportunities between women and men.

B) PRINCIPLES OF THE EQUALITY PLAN

Universal	Designed for all people , not exclusively for women or men.
Preventive	Predictive in nature , thus attempting to eliminate future discrimination based on sex.
Transversal	Global application of the perspective of equality between men and women in all company decisions.
Dynamic	Open to changes , as a result of its monitoring.
Participated	Collaborative and shared , with all the parties involved.
Endowed	Guaranteed in terms of resources necessary for its implementation, monitoring and evaluation.

B) PHASES

The Plan has been designed in accordance with LO 03/2007 itself and art. 9.2 RD 901/2020, under the philosophy of the Deming Cycle or Continuous Improvement, feedback in an endless loop or ending when Equality between women and men is truly effective.



Deming	Phases
Plan: plan	1. Diagnosis (and negotiation)
Do: implement	2. Implementation (prior approval)
Check: measure	3. Evaluation (and follow-up)
Act: act	

PHASE 1: Carry out a quantitative and qualitative analysis, taking into account the idiosyncrasies of the Company and the time at which the analysis is being made.

Therefore, far from being a single or static phase, it requires constant updating, adapting the diagnosis as the data changes.

Fundamental General Principles in this phase: universal, preventive and transversal.

PHASE 2: Definition of the objectives to be achieved and the actions required to achieve them.

Strategic objectives as well as operational objectives are defined. Likewise, the implementation calendar must be defined; responsible for carrying out the different actions and, finally, determine the indicators that allow us to measure the degree of achievement and to be able to evaluate and continue improving.

Fundamental General Principles in this phase: universal, preventive, transversal, participatory and endowed.

PHASE 3: Adaptation of the content of the Plan to advance the principle of Equality in accordance with its philosophy of Continuous Improvement.

The persons designated for the Evaluation and Follow-up of the Equality Plan will be those designated and appointed during the negotiation of the Plan.

Fundamental General Principles in this phase: universal, transversal, dynamic, participatory and gifted.

2. STRUCTURE OF THE EQUALITY PLAN

A) DETERMINATION OF THE PARTIES: NEGOTIATING BOARD

Members	DNI/NIE	Position	Representation
Ms. S.A.	-	Human Resources Business Partner for Spain	Twilio Spain, SL
Ms. L.C.	-	Representative of CCOO	Workers of Twilio Spain, SL

LEGAL REPRESENTATION OF THE WORKERS

On behalf of the workers, in accordance with current regulations, since there is no Legal Representation of the Workers in the Company, invitations were sent to the most representative unions and representatives of the sector for their participation in the negotiations of the Twilio Equality Plan. Invitations were sent to the Trade Union Confederation of Workers' Commissions ("CCOO") and General Union of Workers ("UGT"). CCOO agreed to have a first meeting of the negotiating commission of the equality plan on May 9, 2022. An invitation was sent to the UGT to the meeting on 9 May 2022, without receiving a response.

CONSTITUTION OF THE NEGOTIATION COMMITTEE

The Plan has been negotiated by the Negotiating Commission (hereinafter, the “**Negotiating Commission**” or the “**NC**”) after analyzing the initial diagnosis. The NC was established on behalf of the Company by Ms. S.A. – Human Resources Business Partner for Spain and on behalf of the workers by Ms. L.C. on behalf of the CCOO.

The CN has been governed during the negotiation period by the Operating Regulations agreed in the Constitution Act of the CN, in order to provide the functions and obligations, methodology, operating regime, holding of meetings and adoption of agreements.

B) PERSONAL, TERRITORIAL AND TEMPORARY AREAS

The Plan is applicable to all current and future workers who provide services to the Company, whatever their contractual modality or position.

The Plan will apply to Twilio Spain, which currently has only one work center in Spain, located in Madrid.

The Plan will be valid for 4 years from the day following the date of its approval and signature. Twilio will begin the process of its renewal three months before the expiration of the term of this plan.

C) REPORT OF THE DIAGNOSIS OF THE SITUATION OF THE COMPANY AND CONCLUSIONS

For the preparation of the Equality Plan, the Negotiating Commission carried out an initial diagnosis of the Company in which qualitative and quantitative factors were taken into account. Likewise, the results of the survey on equality made to the entire workforce were included.

The activity of the organization and its particularity, its workforce and work life cycle were analyzed, with a gender perspective based on equal opportunities between women and men in work environments. The results were contrasted with more than 40 references, through studies, information, data and statistics, to contextualize them within the organization.

A query was made to the staff through an anonymous and telematic survey, with a response rate of 100% of the staff, a confidence level of 95% and a Sampling Error of +/- 0%, for which it is considered scientifically validated. Additionally, a second control filter was included, the necessary representativeness of all socio-demographic factors (sex, age and job), through the well-known 80% Rule.

The outbreak of the pandemic and its impact on the health, social and economic crisis were taken into account. The criteria for interpreting and analyzing the report were adjusted, and terminology defined by means of a common language related to the subject was agreed upon.

The CN had the support and advice of an external consultant specializing in equality between men and women in the workplace. Likewise, the consultant provided training on equality to the members of the CN to be able to carry out an adequate analysis of the situation diagnosis and to be able to negotiate and agree on the content of the Plan.

The most relevant conclusions of the Situation Diagnosis were the following:

- Life project for its people (97% have an indefinite contract and 100% full-time).
- Company growth (more than 400% from 2019 to 2021 [from 40 to 173 people]).
- Experienced and trained workforce (with an average age of 35.8 years in 2021 and 83% of the workforce reaching the level of graduate, graduate or doctorate).
- Minimum voluntary turnover (2% between 2020 and 2021, with 0% voluntary termination).

- Diverse, multinational and multicultural company (25% do not have Spanish nationality and the internal working language is English).
- Men make up the majority of the workforce in Spain (83% men and 17% women in 2020) in the process of continuous improvement (75% men and 25% women in 2021).
- Few suitable profiles for job seekers (engineers and, specifically, female engineers with command of the English language).
- Presence of 14% of women in the first line of command (Managers: 1 of 7 in 2020)
- Extensive conciliatory catalog.
- Extensive training catalog.
- Company committed to diversity, inclusion and equity (DEI)
- Own remuneration system implemented globally, based on Job Level
 - Normalized average salary gap of 36% with a direct impact on 13 women. Negative in 2 women and low (7%) in newly incorporated women.
 - There is no wage gap by type of contract or working hours.
 - External audit.
 - We are not aware of any employees in Spain in 2020/2021 who have/had a disability as per the legal definition
- Massive participation in the survey (100% of the workforce), with a high perception by the workforce of Equality (average of 8.2 out of 10).
- Absence of final convictions (in matters of equality and conciliation).
- Up to date with payment of their remuneration obligations (with workers, Social Security and Public Finance).
- Uninterrupted line for reporting discriminatory acts.
- Up to date with the payment of its obligations with the AT and the SS.
- The Company declares the following:
 - There is no subsidy or prerogative in terms of Social Security or annexes for the hiring of workers of groups in a situation or risk of exclusion.
 - They do not exist or are not aware of people identified as being at risk of exclusion or women who are victims of gender-based violence. Nor of people in danger or situations of special protection due to age, pregnancy or discrimination.
 - It has not been registered in the last financial year nor is there any record of a complaint by any person of discriminatory acts of any nature or origin.
 - It is up to date on Occupational Risk Prevention in its four specializations.
 - It has no record of complaints for discriminatory acts during the last financial year 2021 and its complaints channel has not been activated from Spain in previous years.

The absence of women engineers with high qualifications, experience and command of English is the greatest challenge that the Company faces in order to expand the number of women in its university classrooms in the STEM (Science, Technology, Engineering and Mathematics) environment.

D) RESULTS OF THE REMUNERATION AUDIT

The Remuneration Audit has taken into account all the Company's employees, regardless of the duration of their service. It should be noted that all the normalizations refer to days, since the days are complete for 100% of the people.

The type of adjustment is outlined by job group, concept, number of people involved and sex, including the causes of articles 45 and 46 of the Workers' Statute.

Finally, the normalized and real salary gaps were calculated, both for the averages and the medians. All were calculated by their totals and by groups of jobs of equal value and, in turn, by individualized payroll fields and by conceptual groups: total compensation, salary supplements, extra salary supplements and overtime.

The most relevant conclusions of the Remuneration Audit were the following:

- The salary gap of the total normalized average remuneration for the entire workforce is 30.8% and the real one is 36.8%. Both are highly compensated, but not their medians.
- Of the 8 Job Levels:
 - 3 are single-person, all of them occupied by men.
 - 2 presented a negative Salary Gap (SG). At the lowest level and at the second highest (the latter with a large percentage). The two levels correspond to 2 women and 10 men at 50%.
 - 3 present positive SG. They concentrate 84% of the workforce at levels P2, P3 and P4, the first being insignificant compared to the following.
 - These gaps directly affect (according to this variable) 13 women (14% of the workforce) of the 15 that are part of the group.
- From the variable Interval of Seniority, deepening in the positive SG:
 - There are 9 women with very low SG, 7%, with respect to the total of the organization (30%). They are those women with seniority between 0 and 1 year or, those recently incorporated.
 - There is no positive SG, but negative, in the 4 women with seniority from 1 to 2 years.
 - From the 2nd and 3rd years of seniority, the greatest growth occurs, affecting 2 women and dragging down the average of the organization.
- From the Job Position variable, the level 3 software engineering position also stands out.

- The tensions between the normalized and real calculations in remuneration fields of the Collective Agreement (base salary) tend to zero, to the extent that the normalization adjustments are reduced over the total number of records.
- The calculations of the normalized and real wage supplements are very close, 35.8% and 40% respectively, the first being theoretical and considering that it is the group with the greatest dispersion.
- They have promoted men and women with a result of equal distribution by sex, but more women proportionally to their presence in the workforce, also being the ones who received the most training (1.5 vs. 1.0 h).
- There are 4 levels with wage gaps in overtime, 2 positive and 2 negative, so qualitatively it is not considered an indication of discrimination based on sex.
- In the same way, there are no indications neither in contracting nor in working hours agreement, since all the people are permanent and hired 100% of the working day.

Any gap other than 0% must be analyzed in case there are indications of discrimination based on gender, and any gap greater than 25% should be justified in order to rule out precisely said indications. If they exist, a corrective plan aimed at their eradication will be edited.

The validity of the Remuneration Audit will be the same as the validity established for the Equality Plan in this document, except for circumstances that make it advisable to update it due to substantial changes in the organization's remuneration policy or other causes that make its alteration foreseen.

E) DETERMINATION OF THE STRATEGIC OBJECTIVES

The main objective of the Equality Plan is to guarantee and integrate in Twilio, in a conscious, transparent and voluntary way, the real equality of opportunities between women and men, eliminating any type of discrimination, as well as the promotion of equality in all areas, incorporating it into its management model. This general objective is specified in a series of specific objectives articulated in the 9 areas of action detailed below

1. To guarantee equal treatment and opportunities between women and men in the Company, through the implementation of a real management model free of discrimination
2. The criteria for entry and exit will be exclusively based on the assessment of individual aptitudes and abilities, so that no discrimination of any kind takes place.
3. The criteria for professional development and promotion will be exclusively based on individual aptitudes and abilities, so that there is no discrimination of any kind.
4. Transmit an egalitarian image in all facets of the organization, avoiding the promotion of gender stereotypes that are an obstacle to achieving equality.
5. Remuneration should be governed by the principles of equity and non-discrimination.
6. Integrate the dimension of equality in the management of occupational risks and people's health, also valuing the singularities derived from gender.
7. Promote social policies for personal and professional growth of the organization itself in a diverse working environment.
8. Promote work-life balance and co-responsibility to help people grow personally and professionally.
9. Zero tolerance for any type of discrimination, of any origin or purpose, by action or omission.

F) DESCRIPTION OF SPECIFIC MEASURES, PERIOD OF EXECUTION AND PRIORITIZATION OF THE SAME, AS WELL AS DESIGN OF INDICATORS THAT ALLOW THEIR EVOLUTION TO BE DETERMINED.

Areas:

1. recruitment and attrition
2. personal and professional development;
3. communication;
4. reconciliation and co-responsibility;
5. training
6. flexibility
7. occupational risk prevention and wellbeing;
8. compensation;
9. transversal measures;
10. social policy
11. implementation and promotion of the Harassment Protocol; 12.
12. gender-based violence

MEASURES	RESPONSIBLE	VALIDITY	CALENDAR / Deadline	Budget	INDICATOR
RECRUITMENT AND ATTRITION					
Nº 1 <i>Facilitate the <u>inclusion of the under-represented sex</u> in the final stages of selection processes under equal conditions.</i>	HR	Validity of Equality Plan (EP)	6 months	NA	Number of female employees hired/Total number of hires per fiscal year
Nº 2 <i>Include the gender perspective in the disengagement process to <u>identify reasons for leaving</u> in relation to possible root causes in terms of Equality or work-life balance.</i>	HR	Validity of EP	6 months	NA	No. of voluntary resignations for these reasons per fiscal year
Nº3 <i><u>Review all documents related to the selection process</u> for compliance with the principle of equality.</i>	HR	Validity of EP	6 months	NA	Documents reviewed from a gender perspective per fiscal year.
Nº 4 <i>Publicize the <u>company's commitment</u> to equal opportunities in job offers (internal and external).</i>	HR	Validity of EP	6 months	NA	Number of offers published with commitment / total number of offers published per fiscal year.
Nº 5 <i>Collect <u>statistical information</u> disaggregated by sex according to the type of contract, the reasons for termination (end of contract, IT, voluntary leave, probationary period, non-appearance...), voluntary leave, probationary period, non-appearance, etc.).</i>	HR	Validity of EP	6 months	NA	Number of women and men by type of contract and terminations per fiscal year.

PROFESSIONAL AND PERSONAL DEVELOPMENT					
Nº 6 <i>Facilitate the <u>promotion of the less represented sex</u> in the final phases of the</i>	HR	Validity of EP	6 months	NA	Number of promotions by gender in fiscal year

<i>processes (horizontal, vertical, functional or national) under equal conditions.</i>					
Nº 7 <i>Facilitate access <u>for both genders to training specialties</u> that contribute to professional development in a balanced manner.</i>	HR	Validity of EP	6 months	NA	% by sex of Participated Actions by Training Areas and hours per fiscal year.
Nº 8 <i>Raise awareness of <u>gender equality among the workforce</u>, as a strategic matter of the commitment of the Company.</i>	HR	Validity of EP	6 months	NA	No. of awareness-raising actions in the fiscal year No. of communications in the fiscal year
Nº 9 <i>For the filling of vacancies, <u>priority will be given to internal applications</u>, both through transfers of centers and promotions.</i>	HR	Validity of EP	3 months	NA	Total number of selected internal applications/total number of recruits per fiscal year.

COMMUNICATION					
Nº 10 <i>Ensure <u>inclusive language</u> (image and text) in institutional publications (website, advertisements, videos...)</i>	HR	Validity of EP	3 months	NA	No. of reviews with a gender perspective per fiscal year
Nº 11 <i><u>Inform workforce</u> about Equality Plan</i>	HR	Vigencia PI	From the publication of EP	NA	No. of people informed/ No. of staff.

CONCILIATION AND CO-RESPONSABILITY

Nº 12 <i>Structure <u>conciliation and co-responsibility</u> as a management model by preparing a catalog of conciliation measures</i>	HR	Validity of EP	6 months	NA	Prepare a Catalog of Reconciliation Measures-
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Nº 13 <i>Make it possible to combine suspension leave with holidays.</i>	HR	Vigencia PI	3 months	NA	Nº of requests
Nº 14 <i>Increase the period of time during which breastfeeding leave can be requested until the child reaches the age of 12 months, regardless of whether the other parent takes this leave. From 9 to 12 months of age, this leave will be unpaid, as established by law.</i>	HR	Validity of EP	6 months	NA	Yes/No
Nº 15 <i>Extend the possibility of taking leave of absence to care for minors until the child reaches 12 years of age, under the terms established by law. During the first year, they will have the right to reserve their job. After this period, the reservation shall be transferred to a post in the same professional group or equivalent category.</i>	HR	Validity of EP	6 months	NA	Yes/No

TRAINING

Nº 16 <i>To provide specific training and awareness-raising actions on equality for those involved in the processes of selection, professional classification, recruitment, promotion and training, as well as for staff responsible for implementing the measures of the Equality Plan.</i>	HR	Validity of EP	12 months	NA	Number of people trained /No. of persons forming the target group per tax year
Nº 17 <i>Include equality modules in training for new staff</i>	HR	Validity of EP	12 months	NA	Number of people trained /No. of persons forming the target group per tax year

SPATIAL AND TEMPORAL FLEXIBILITY

Nº 18	Management	Validity of EP	6 mo	NA	% and/or Nº of jobs incorporated into use of these policies
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<i>Promote <u>Spatial and Temporal Flexibility policies</u> by encouraging flexible organization of work according to operational needs as well as remote working, in accordance with our internal policy, and taking into account the environment and needs of the company.</i>			months		
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OCCUPATIONAL RISK PREVENTION AND WELLBEING

<i>Nº 19 Implement <u>Digital Disconnection Protocol</u></i>	Management	Validity of EP	6 months	NA	Yes/No
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COMPENSATION

<i>Nº 20 Analyze the possible <u>Wage Gaps</u> derived from the Wage Register that occur by gender and by work center in terms of equality and suitability of working conditions. If the study reveals gender-based pay gaps, develop an action plan for their correction in accordance with legal obligations.</i>	Management	Biannual	6 months	NA	% of Salary Gap
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TRANSVERSAL

<i>Nº 21 Designing the Annual Monitoring Report of the Equality Plan for the Monitoring Committee.</i>	HR	Validity EP / Biennial	12 months	NA	Annual Review Report Yes/No
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SOCIAL POLICY

Nº 22 <i>Promotion of <u>Social Policies</u> by informing the employees of Social policies implemented in the company</i>	Management	Validity of EP	6 months	NA	Number of communication actions per tax year
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HARASSMENT

Nº 23 <i>Implementation and promotion of the <u>Protocol against sexual and gender-based harassment</u></i>	Management	Validity of EP	From publication of EQ	NA	Yes/No
Nº 24 <i>The company's Equality Plan is annexed to the Protocol for the prevention and action of sexual or gender-based harassment.</i>	HR	Validity EP	From Publication of EP	NA	Yes/No

GENDER VIOLENCE

Nº 25 <i><u>A campaign will be created for the International Day against gender violence (25th November)</u> which will be published through the usual information channels, disseminating the services to help victims, e.g. 016 number, etc...</i>	RH	Validity EP - 25th november	6 months	NA	Campaign implemented
Nº 26 <i><u>A protocol for victims of gender-based violence will be created.</u></i>	RH	Validity EP	12 months	NA	Yes/No
Nº 27 <i>Victims of gender-based violence</i>	RH	Validity of EP	3 months	NA	Yes/No

<i>will be allowed to change their holiday period.</i>					
Nº28 <i>Establish a <u>leave of 3 paid days in the event of a change of address of the victim of gender violence, including in these 3 days what is regulated according to current legislation</u></i>	RH	Validity of EP	6 months		Yes/No

ARTICULATION OF STRATEGIC OBJECTIVES, AREAS AND OPERATIONAL MEASURES

STRATEGIC OBJECTIVES		AREAS OF ACTION	CONCRETE MEASURES	
1	Management model	Transversal	11	Equality Plan Scorecard
2 3	Recruitment and attrition Promotion and development	Recruitment and attrition Professional and Personal Development	1	Preference if equal merit
			2	Root cause of attrition
			3	Equal engagement
			4	Collect statistical information
			6	Preference if equal merit
3 4	Promoción y desarrollo Equal image	Desarrollo Profesional y Personal Communication	7	Facilitate equal participation
			8	Raise awareness in equality
			9	Facilitate internal mobility
			10	Ensure inclusive language
4 5	Imagen igualitaria Remuneration	Comunicación Compensation	11	Communicate Equal Plan
			20	Salary Gap Analysis

6	Occupational risks, health and singularity	Prevention and Wellbeing	19	Digital Disconnection
7	Diverse work environment	Social Policy	22	Diversity indicators
8	Conciliation	Conciliation and Co-responsibility	12	Structure and measure work-life balance
8 9	Conciliación Training		13	Union of suspension leave and PTO
			14	Breastfeeding leave
			15	Child care leave
		Flexibility	18	Promote Spatial and Temporal Flexibility
		Training	16 17	Training in Equality to managers and new hires
10	Follow up	Follow up	21	Annual Follow-up Report
11	Zero tolerance	Harassment	23 24	Promote the anti-harassment protocol and include this as annex of Equality Plan
		Gender Violence	26 27 28	Protocol Change of holiday season Leave for change of address

G) IDENTIFICATION OF THE MEANS AND RESOURCES, BOTH MATERIAL AND HUMAN, NECESSARY FOR THE IMPLEMENTATION, MONITORING AND EVALUATION OF EACH OF THE MEASURES AND OBJECTIVES

In all actions is the collection of data throughout the year.

The resources will be those necessary for administrative control and made available by the HR department to the Monitoring and Evaluation Commission.

The Plan relies on data knowledge to decide accordingly.

What is measured, managed and transferred to the Dashboard for trend analysis.

There is no budget in euros for material resources, considering human resources in hours and at discretion.

The responsibility for accounting and reporting lies with Mr./Mrs. (see below), as members of the future Commission for the Evaluation and Follow-up of the Plan (see annex):

- [Sofia Allue, HR Business Partner]
- [Zoe Deverell, Senior Regional Diversity, Equity and Inclusion Manager]
- [Tiara Chivers, People Compliance Senior Manager]
- Spain Hub Leader

H) CALENDAR OF ACTIONS FOR THE IMPLEMENTATION, MONITORING AND EVALUATION OF THE MEASURES OF THE EQUALITY PLAN

ACTIONS	Year 1	Year 2	Year 3	Year 4
<i>Control of Measures 1 to 10, 13, 16 to 18, 22, 25 to 28</i>	Annual			
<i>Control of Measures 12, 14, 15 and 19</i>	6 months			
<i>Control of Measures 11, 23 y 24</i>	Since publication of Equality Plan			
<i>Control of Measure 20 (Salary Gap from Salary Register)</i>	Annual			
<i>Informal Meetings CES</i>	Biennial		Biennial	
<i>Ordinary Meetings, by CES - Follow-up report and update (21)</i>		Biennial		Biennial
<i>Extraordinary Meetings of CES</i>	On demand, whenever there are incidents			
<i>Salary audit and workforce diagnosis, unless there is a substantial changes in conditions and environment</i>				Three months before the end of the year
<i>Convocation of the Negotiating Committee to update Edition II of the PI, by the CES</i>				Three months before the end of the year

(*) CES: Comisión de Evaluación y Seguimiento / Follow-up Committee

3. FOLLOW-UP, PERIODIC EVALUATION AND REVIEW OF THE PLAN

The Follow-up, Evaluation and Review phase will allow the development of the Equality Plan and the results obtained in the different Work Areas. In the Circle of Continuous Improvement, it unfolds into two routines, measure and act, according to the balance between result and expectation.

The Monitoring, Evaluation and Review phase will provide information on possible needs and/or difficulties arising in the execution. This knowledge will enable its coverage and correction, providing the Equality Plan with the necessary flexibility for its success and which was noted as one of its General Principles (dynamic).

The results will form part of the annual, biennial and final evaluation.

A) EQUALITY PLAN ASSESSMENT, MONITORING AND REVIEW COMMITTEE

An equality committee (hereinafter, the "CES") is set up to monitor, assess and periodically review the Plan, which will act as a body for promoting, monitoring and monitoring the Plan throughout the entire period. the validity of the same, allowing to verify the level of fulfillment of the objectives and the effectiveness of the agreed measures

The composition, functions and calendar of meetings of the IC will be governed by the regulations of the CES approved by the CN and which is attached as an Annex 1 to Plan.

B) MODIFICATION PROCEDURE, INCLUDING THE PROCEDURE TO SOLVE POSSIBLE DISCREPANCIES THAT MAY ARISE IN THE APPLICATION, MONITORING, EVALUATION OR REVIEW, AS LONG AS LEGAL OR CONVENTIONAL REGULATIONS DO NOT OBLIGATE ITS ADAPTATION

MODIFICATION AND UPDATING OF THE EQUALITY PLAN

Without prejudice to the deadlines indicated, the Equality Plan must be reviewed when the following circumstances occur (art. 9.2 RD 901/2020):

- Its lack of adaptation to the legal and regulatory requirements or its influence as a result of the performance of the Inspection of Work and Social Security.
- In the cases of merger, absorption, transmission or modification of the legal status of the company.
- In the event of any incident that substantially modifies the workforce, work methods, organization or remuneration systems, substantial modifications or those analyzed in the diagnosis that gave rise to the Equality Plan.
- When by judicial resolution the company is sentenced for direct or indirect discrimination based on sex.
- When it is determined that the Plan is not suitable for legal or regulatory requirements.

At any time, the Equality Plan may be revised (art. 9.4) in order to add, reorient, improve, correct, intensify, mitigate or even stop applying any measure that it contains depending on the effects that are appreciated in relation to with the achievement of its objectives.

PROCEDURE TO SOLVE POSSIBLE DISCREPANCIES THAT MAY ARISE: EXTRAJUDICIAL SOLUTION OF CONFLICTS

Adhesion to the Agreement on Extrajudicial Settlement of Labor Disputes (ASEC). Fully subject to the mediation bodies established by the Interconfederal Mediation and Arbitration Service (SIMA).

4. SIGNATURE

The Equality Plan in its first edition is approved under the terms of this document, which may be designed and edited in different formats for better dissemination and knowledge.

The undersigned approve, validate and sign it as members of the Negotiating Commission on the day and place of signature.

At the same time, the corresponding works are commissioned for registration in the public registry, which will also allow public access to the content of the Plan.

In Madrid, 10th February 2023

Signature of Twilio's representative

Ms. S.A.

Signature of Union's representative (CCOO)

Ms. L.C.

ANNEXES

A. REGULATIONS OF THE ASSESSMENT, MONITORING AND REVIEW COMMITTEE.

REGULATIONS OF THE TWILIO SPAIN, S.L.U. EQUALITY PLAN MONITORING COMMITTEE.

First. A Monitoring Committee will be set up, which will meet ordinarily once a year, and extraordinarily whenever deemed necessary.

The monitoring committee shall be made up of the following persons:

- *[Sofia Allue, HR Business Partner]*
- *[Zoe Deverell, Senior Regional Diversity, Equity and Inclusion Manager]*
- *[Tiara Chivers, People Compliance Senior Manager]*
- *Spain Hub Leader*

Should any of these persons leave Twilio Spain SL we shall ensure that an employee from the same team shall replace them. In other words there will always be an HR Business Partner, Diversity, Equity and Inclusion team representative, Compliance team representative and the Spain Hub Leader at that time on the Monitoring Committee.

The term of the Monitoring Committee shall be the same as that of the Equality Plan of which it forms an integral part.

Second. The Monitoring Committee must focus on analyzing the implementation and development of the different measures and strategies defined in the Equality Plan and indicate the need, or not, to totally or partially modify any of the measures undertaken.

The Monitoring Committee will have the following competences:

- To assess the degree of compliance with the objectives established in the Equality Plan.
- Verify the execution of the measures envisaged in the Equality Plan, and whether they are in line with the objectives initially set.

- Check whether the proposed timetable for the different measures/objectives is being complied with.
- Detect possible obstacles or difficulties in the implementation and execution of the measures and make the appropriate adjustments.
- Proceed to the evaluation and/or adaptation of the Equality Plan in case it becomes necessary due to organizational needs that may arise during its validity.
- convene the Equality Plan Negotiation Committee three months before the expiry of each edition.

The follow-up will be documented by means of the reports, written documents or files that are considered appropriate in each case.

Third. During the term of the Plan, the Monitoring Committee will meet ordinarily once a year.

Fourth. At the ordinary meetings, the notice of the meeting shall be sent to the members at least thirty calendar days before the date of the meeting. The notice shall always contain the agenda, as well as the date, time and place of the meeting and shall be accompanied, where appropriate, by the necessary documentation, which shall include information on the agreed monitoring indicators.

Fifth. The meetings may be held telematically, in which case the Company shall send the access links to all the members of the Monitoring Committee.

Sixth. The Monitoring Committee may meet extraordinarily at the request of any of the parties with a minimum of thirty calendar days' notice, at the request of the majority of its members.

Seventh. The Monitoring Committee shall be validly constituted when, duly convened, at least one third of the members are present or represented.

Eighth. Minutes shall be taken after each meeting of the Monitoring Committee. The minutes shall record the matters dealt with and the agreements reached; in the event of disagreement, the positions defended by each of the members of the Monitoring Committee shall be recorded in the minutes.

Ninth. Adoption of agreements. The decisions of the Monitoring Committee shall be taken, in general, by consensus. If a vote is necessary, the proposal will be understood to be agreed when it obtains the favorable vote of a simple majority.

Tenth. The members of the Equality Monitoring Committee, as well as its advisors, are obliged to respect the confidentiality and professional secrecy of the matters discussed at the meetings as well as the documentation and data presented and provided by the parties, and may not be used for purposes other than those foreseen in this Annex.

C. PROTOCOL FOR THE PREVENTION OF SEXUAL HARASSMENT AND SEX-BASED HARASSMENT

PROTOCOL FOR THE PREVENTION OF SEXUAL HARASSMENT AND SEX-BASED HARASSMENT

1. Purpose

Twilio Spain, S.L. (hereinafter "Twilio", the "**Company**" or the "**Organisation**") has approved this protocol for the prevention of sexual harassment and harassment based on sex at work (the "**Protocol**") which shall be applicable to the Company.

This Protocol takes into account the recent adoption of Convention 190 of the International Labour Organization on the elimination of violence and harassment in the world of work and ILO Recommendation No. 206 of June 2019 on violence and harassment, as well as Law 15/2022 of 12 July on equal treatment and non-discrimination.

2. Definitions

2.1 Sexual harassment: any conduct, verbal or physical, of a sexual nature which, without being a freely accepted and reciprocated approach because it is desired by the person subjected to it, has the purpose or has the effect of violating the dignity of a person, in particular where an intimidating, degrading or offensive environment is created.

The conditioning of a right or an expectation of a right on the acceptance of a situation constituting sexual harassment shall also be considered sexual harassment.

While sexual harassment usually involves a pattern of behaviour, it may take the form of a single incident. By way of example, and without being exclusive or limiting, the following conduct could constitute sexual harassment:

- a. **Verbal conduct:** examples of verbal conduct constituting sexual harassment include, but are not limited to, and analysed on a case-by-case basis, alleged sexual advances, propositions or pressure for sexual activity; offensive flirtations; suggestive comments, innuendoes or obscene remarks; unwanted phone calls or social media contacts; jokes or comments about appearance;
- b. **Non-verbal behaviors:** display of sexually suggestive or pornographic pictures, objects or writings, clearly lewd looks, gestures; offensive and sexually suggestive letters, e-mails or social media messages;

- c. **Physical behaviors:** deliberate and unsolicited physical contact or suggestive gestures, unwanted hugs or kisses, excessive and unnecessary physical contact.

2.2 Quid pro quo sexual harassment or sexual blackmail: among the behaviours constituting sexual harassment, we can distinguish quid pro quo sexual harassment or sexual blackmail, which consists of forcing the victim to choose between submitting to sexual demands, or losing or being harmed by certain benefits or working conditions, affecting access to professional training, continued employment, promotion, remuneration or any other decision in relation to the working or professional environment. Insofar as it involves an abuse of authority, its active subject will be the one who has the power, either directly or indirectly, to provide or withdraw a benefit or condition of work.

2.3 Environmental sexual harassment: in this type of sexual harassment, the harasser creates an intimidating, hostile, degrading, humiliating or offensive environment for the victim, as a consequence of unwanted attitudes and behaviour of a sexual nature. It can be carried out by any member of the company, regardless of position or status, or by third parties located in any way in the work environment.

2.4 Harassment on grounds of sex: harassment on grounds of sex is any behavior carried out on the basis of a person's sex with the purpose or effect of violating that person's dignity and creating an intimidating, degrading or offensive environment.

In order to determine that a situation can be classified as harassment on grounds of sex, a series of elements that form a common denominator must be present, among which the following stand out:

- a. Harassment, understood as any intimidating, degrading, humiliating and offensive conduct, and which is perceived as such by the person who suffers it.
- b. Objective attack on the victim's dignity and subjectively perceived as such by the victim.
- c. Plurioffensive result. The attack on the dignity of the person who suffers harassment on grounds of sex does not prevent the concurrence of damage to other fundamental rights of the victim, such as the right not to suffer discrimination, an attack on the psychological and physical health, etc.
- d. That it is not an isolated act.

2.5 Subjects (active and passive): any person related to the Company. Both men and women can be active and passive subjects.

2.6 Horizontal harassment: occurs when the victim and the alleged harasser are at the same hierarchical level in the company.

2.7 Vertical harassment: occurs when the victim and the alleged harasser are at different hierarchical levels in the company.

3. Scope of application

The Protocol, which shall apply from its approval on **10th February 2022**, shall be binding on all Company personnel (permanent, temporary, agency workers or contractors), including management personnel, irrespective of the function performed, the title of their position, the manner and place of provision of services or the form of employment contract.

It shall also apply to persons who, not having an employment relationship, provide services or collaborate with the Company, such as persons who have the status of administrators or directors, persons who carry out non-employment practices, as well as those persons who maintain or are in the process of maintaining a professional relationship with the Company. Including but not limited to clients, customers and service users.

The Protocol shall apply to situations of sexual harassment and harassment based on sex that occur during work or the provision of services, in connection with work or as a result of work. The following are listed by way of example, but not limitation:

- a. At the workplace, including public and private spaces where work is carried out, including facilities where workers rest, eat, use sanitary, washing or changing facilities.
- b. During work-related travel, meetings, conferences, social or training events or activities.
- c. In the context of work-related communications, including those made by means of information and communication technologies (virtual harassment or cyber-bullying).
- d. In accommodation provided by the Company.
- e. In commuting between home and the workplace.

4. Declaration of Principles

The Company is committed to defending the dignity of all workers, is committed to creating and maintaining a working environment that respects personal dignity and freedom, and is therefore committed to creating, maintaining and protecting a working environment that respects the rights, dignity and sexual freedom of all those who work in it.

Sexual and/or sex-based harassment in the workplace are expressions of violence that violate various fundamental rights and have a negative effect on the physical, psychological and moral integrity of workers. Both are contrary to the principle of equal treatment between women and men and constitute discrimination on the grounds of sex; moreover, they contaminate the working environment and affect the working climate of the company in which they occur.

In the conviction that the Company's culture and values are oriented towards respect for the dignity of the people who make up the Company, and with the aim of guaranteeing the protection of the human rights of the individual, this Protocol has been drawn up to define the general guidelines that should govern in order to, to prevent this type of conduct and, to eradicate any behavior that may be considered as such in the workplace, extending this Protocol to all employees of the Company in any of its centers, who have the duty to comply with it.

The Company undertakes to prevent behavior constituting harassment and to deal with any complaints that may arise, in accordance with the following principles:

- a. Everyone has the right to receive correct, respectful and dignified treatment, and to have their physical and moral integrity respected, and may not be subjected under any circumstances, including their sex or sexual orientation, to degrading, humiliating or offensive treatment, regardless of who the victim or harasser is in the situation reported.
- b. The Company declares its firm commitment to establish all the mechanisms within its reach to avoid any type of situation that violates dignity, physical and/or moral integrity, equal treatment and free development of personality in the workplace.
- c. The Company will operate zero tolerance to conduct that may constitute sexual harassment or harassment based on sex in any of its manifestations.
- d. The Company undertakes to publicize the existence of this Protocol, indicating the need for strict compliance with it, both internally and externally, and to carry out appropriate communication, training and awareness-raising activities to ensure that it is properly understood and put into practice throughout the organization.
- e. By implementing this Protocol, the Company assumes its commitment to prevent, not tolerate, combat and address any manifestation of sexual harassment or harassment based on sex in its organisation.
- f. Employees of the Company who suffer a situation of harassment at work or those who become aware of it have the right to report the situation to their HR Business Partner or to the Ethics & Whistleblower Hotline at www.twilio.ethicspoint.com

5. Objectives

The objectives to be achieved by this Protocol should be systematized, among others, as follows:

- a. To express zero tolerance towards situations of sexual and/or sex-based harassment that may be detected at any level of the organization.
- b. Promoting a culture of prevention of sexual and/or sex-based harassment in all areas and at all levels.

- c. Facilitate the identification and reporting of conduct constituting sexual and/or sex-based harassment in its different manifestations.
- d. To investigate complaints of harassment internally, in an agile, rapid and confidential manner, in order to determine whether a situation of sexual and/or sex-based harassment has arisen.
- e. Support the person who has suffered harassment in order to avoid secondary victimization or re-victimisation and facilitate, where appropriate, access to the psychological and social support required, repairing, as far as possible, the damage that may have been caused.
- f. Guarantee the non-existence of reprisals for having participated in the process, ensuring that those who intervene will not be subject to intimidation, persecution or reprisals, with any action in this regard being considered subject to the disciplinary sanctions deemed appropriate.

6. Principles of procedure

The following principles should be respected when dealing with complaints received:

- a. Easy access to the procedures, which must be sufficiently promoted.
- b. Confidentiality and respect for the privacy and dignity of the persons concerned.
 - c. Respect for the principle of the presumption of innocence of the alleged harasser.
 - d. Prohibition of reprisals against the alleged victim or persons who support the complaint or report cases of sexual and/or sex-based harassment.
 - e. Diligence, speed, security, coordination and collaboration in the procedure.
 - f. Endeavor to ensure the labor and social protection rights of the victims.
 - g. Thorough investigation of the facts, which will be resolved after hearing from the persons affected and the alleged harasser guaranteeing the impartiality of any action.
 - h. Guarantee of action by adopting the necessary measures, including, where appropriate, disciplinary measures, against the person or persons whose harassment is proven. Twilio will adhere to the process set out in our collective bargaining agreement “CBA” [\[link\]](#)
 - i. Compensation for the person harassed and protection of their psychological and physical health.

- j. A sex and human rights approach throughout the procedure.

7. Action procedure:

The phases for carrying out the procedure are as follows:

- a. Filing a complaint
- b. Meeting of the harassment protocol investigating committee
- c. Preparation of Informative file
- d. Resolution of the harassment file
- e. Follow-up

In detail:

a. Filing a complaint

It may be submitted in writing or by telephone; to a member of the People Team or the Confidential Ethics & Whistleblowing Hotline Ethicspoint. The complaint may also be submitted to the HRBP or hr@twilio.com.

The report shall detail the facts that motivate it, the person(s) affected by the facts and the alleged harasser(s), and shall provide any evidence that may clarify or prove what is stated therein, in any format, physical or digital.

Employees should be aware that, except in cases of malice or bad faith, they will not be penalized for activating the protocol.

Complaints shall be confidential and secret, but may not be anonymous. The Company will ensure the confidentiality of the parties concerned. In order to guarantee the confidentiality of any complaint, report or communication of harassment, Twilio provides the telephone number, email account and website indicated above, to which only the person in charge of handling the complaint and the members of the investigating committee will have access, and whose purpose is solely and exclusively the submission of this type of complaint or report.

This is without prejudice to the possibility of also accepting complaints that may be submitted secretly, but not anonymously, in writing and in a sealed envelope addressed to the investigating committee.

Once a complaint has been received in any of the aforementioned ways, the person in charge of processing the complaint shall immediately inform the management of the company and the members of the investigating committee.

The presentation of the complaint by the victim of the situation of sexual or sex-based harassment, or by any worker who has knowledge of it, shall be necessary for the initiation of the procedure in the terms set out in the following section.

b. Determination of the investigating committee for harassment cases.

An investigating and monitoring committee for cases of sexual harassment and harassment based on sex shall be set up and shall be made up of three persons:

[Sofia Allue, HR Business Partner]

[Naomi Cody-Sexton, Employee Relations Manager]

[Tiara Chivers, People Compliance Senior Manager]

In the event of absence due to holidays, illness or any other legal reason, he/she may act as a substitute for any of the members:

[Patrycja Michalowska-Tos, HRBP Director]

[Raymond Goh, Employee Relations Manager]

[Bhavana Sharma, People Compliance Manager]

In order to guarantee the maximum confidentiality of this procedure, the persons who are members of this committee shall be permanent.

The term of office of the committee shall be four years. The aforementioned persons who form part of this investigating committee shall comply exhaustively with impartiality with respect to the parties concerned, and therefore, in the event of any kind of kinship by blood or affinity with one or more of the persons affected by the investigation, intimate friendship, manifest enmity with the persons affected by the procedure or direct or indirect interest in the specific process, they shall abstain from acting.

In the event that, despite the existence of these causes, abstention does not occur, any of the persons affected by the procedure may request the recusal of said person or persons from the commission.

In addition, this committee, either by its own agreement or at the request of any of the persons affected, may request the hiring of an external expert who may accompany them in the investigation procedure.

This committee will endeavor to meet as quickly as possible following receipt of a complaint, or knowledge of inappropriate behavior, in accordance with the procedure established in this protocol for its presentation.

The committee shall immediately and thoroughly investigate any report, communication, complaint or report of behavior that could be considered sexual or sex-based harassment.

c. The informative file.

An informative file will be opened. The investigating committee will carry out an investigation in which it will decide whether or not the harassment has occurred after hearing from the persons affected, the witnesses proposed, or requesting any necessary documentation, without prejudice to the provisions on the protection of personal data and confidential documentation.

The persons who are requested to participate shall cooperate as diligently as possible.

During the proceedings, at the proposal of the investigating committee, the Company's management shall adopt the necessary precautionary measures for the immediate cessation of alleged harassment, without such measures entailing permanent and definitive damage to the working conditions of the persons involved. Apart from other precautionary measures, the management of the Company shall separate the alleged harasser from the victim.

In the course of the procedure, the victim shall be heard first and then the alleged harasser. Both parties involved may be assisted and accompanied by a work colleague, who shall maintain confidentiality regarding the information to which he or she has access.

The investigating committee may, if it deems appropriate, seek legal advice during the investigation of the procedure. This legal expert is obliged to guarantee the utmost confidentiality with regard to everything that he/she may have knowledge of or access to as a member of the conflict resolution committee in question, and shall be bound by the same causes for abstention and recusal as the members of the investigating committee.

Once the investigation has been completed, the committee shall draw up a report stating the facts, referencing the testimonies, and the evidence gathered and/or collected, concluding whether or not, in its opinion, there is evidence of sexual harassment or harassment on grounds of sex.

If, from the evidence gathered, it is deduced that there is evidence of harassment, in the conclusions of the report, the investigating committee will urge the company to adopt the appropriate sanctioning measures, and may, in the case of very serious harassment, propose the disciplinary dismissal of the alleged harasser.

If from the investigation there is no evidence or indication of harassment, the committee shall state in the report that the evidence provided does not indicate the existence of sexual harassment or harassment on grounds of sex.

Within the harassment investigatory committee, decisions shall be taken by consensus, whenever possible, and failing that, by majority vote.

d. The resolution of the harassment case

The management of Twilio, once it has received the conclusions of the investigating committee, shall take the decisions it deems appropriate and shall be the only body empowered to decide on the matter. The decision adopted shall be communicated in writing to the victim, to the harasser and to the investigating committee, who shall keep the information to which they have access confidential.

Likewise, the final decision adopted in the case shall also be communicated to the equality plan monitoring committee and to the person responsible for occupational risk prevention. In these communications, in order to guarantee confidentiality, no personal data will be given and the numerical codes assigned to each of the parties involved in the file will be used.

Based on the above, the Company's management will proceed to:

- a. close the proceedings, with a report being drawn up on the matter.
- b. adopt any measures it deems appropriate in accordance with the suggestions made by the investigation committee. By way of example, the following decisions may be taken by the company in this regard:

i. physically separating the harasser from the victim, by means of a change of post and/or shift or timetable. In no case shall the victim of harassment be forced to change position, working hours or location within the company.

ii. Without prejudice to the provisions of the previous point, if appropriate, and depending on the results of the investigation, the harasser shall be sanctioned by applying the table of offenses and sanctions provided for in the collective bargaining agreement applicable to the company or, where appropriate, in article 54 TE.

The following sanctions may be considered applicable to the harasser,:

1. transfer, displacement, change of position, working day or location
2. suspension from employment and salary
3. temporary limitation on promotion
4. disciplinary dismissal

The Company's management shall take the necessary preventive measures to avoid a recurrence of the situation, by reinforcing training and awareness actions and carrying out actions to protect the health and safety of the victim, including, but not limited to, the following:

- Assessment of psychosocial risks in the company.
- Adoption of surveillance measures to protect the victim.
- Adoption of measures to avoid repeat offenses by the sanctioned persons.
- Psychological and social support for the harassed person.
- Modification of working conditions that, with the prior consent of the harassed person, are considered beneficial for their recovery.

- Training or retraining for a harassed person when he/she has been absent on account of the harassment situation for a prolonged period of time.
- Carrying out training and awareness-raising actions for the prevention, detection and action in the face of sexual harassment and/or harassment based on sex, aimed at all persons who provide their services in the company.

e) Follow-up

Once the case has been closed, and within a period of no more than thirty calendar days, the investigating committee shall be obliged to monitor the agreements adopted, that is to say, their compliance and/or the result of the measures adopted.

The result of this monitoring shall be recorded in the appropriate minutes/report, which shall include the measures to be adopted in the event that the events causing the procedure continue to occur. The investigating committee shall also analyze whether the proposed preventive and sanctioning measures have been implemented.

The report shall be sent to Twilio's management, to the person responsible for occupational risk prevention and to the equality plan monitoring committee, with the precautions indicated in the procedure regarding the confidentiality of the personal data of the parties concerned.

8. Business coordination and external staff

When the reporting person and/or the reported person do not belong to Twilio staff but is/are a user of the Company's services or facilities or belong to a contracted company or client, the procedure will be applied with the same guarantees and, where appropriate, in coordination with the company/s involved, following the following guidelines depending on each case:

a. Reporting person is not a Twilio employee, but the reported person is.

A reporting person who is not a Twilio employee considers themselves a victim of harassment or is aware of a case of harassment and informs Twilio. In this event, once the complaint has been filed, the procedure will be applied in the established manner, and the company employing the reporting employee (victim of harassment) must be informed of:

- the opening of the informative file for investigation.
- the precautionary measures adopted, if applicable.
- the final resolution.

In addition, Twilio will require from the company involved all the documentation and information necessary for the investigation committee to clarify the facts. In the event that the company involved

refuses to provide said information, this fact must be stated in the resolution report of the investigating committee.

In the event that the harassment is verified, the necessary measures will be adopted to reverse the situation and to this end, the final resolution of the file will be transferred to the company to which the victim of harassment (the reporting person) belongs.

In the event that the company involved opens an investigation file in the same case, it will be provided with the information and documentation necessary to clarify the facts and information will be requested on the final resolution it adopts.

b. Reporting person is a Twilio employee, but not the reported person.

The complaint will be submitted to Twilio by the procedure described in this protocol.

If the reported person is an employee of a third company, once the complaint has been filed, the procedure will be applied as established, and the company of the reported person must be informed of:

- the opening of the informative file for investigation.
- the precautionary measures adopted, if applicable.
- final resolution

The precautionary measures that affect the reported person will be proposed to the company to which they belong and the same confirmation of the precautionary measures finally adopted will be requested in order to be included in the final resolution report.

In the event that the company involved does not respond or decides not to apply precautionary measures, the possibility that the precautionary measures fall on them will be proposed to the reporting person, in order to avoid the continuation of the alleged harassment. In any case, they will be accepted voluntarily or will not be applied.

The company of the reported person will be required to provide as much documentation and information as is necessary for the investigation committee to clarify the facts. In the event that the company involved refuses to provide said information, this fact must be stated in the resolution report of the investigation commission.

In the event that the company involved opens an investigation file in the same case, it will be provided with the information and documentation necessary to clarify the facts and information will be requested on the final resolution it adopts.

c. Neither the reporting person nor the reported person works at Twilio.

Both subcontracted personnel and users of services provided by Twilio may be involved in situations of sexual harassment or harassment based on gender. In these cases, if a complaint is received by Twilio, a file will be opened by the Company.

The precautionary measures deemed appropriate will be adopted or, if their application is not possible because the persons involved are not directly employed by Twilio, the proposal of precautionary measures will be made to the companies involved.

In these cases, Twilio will make itself available to the companies in order for them to investigate the facts and resolve them as quickly as possible. Information on their resolutions will be requested from these companies, in order to monitor and finally close the file. The closing of the file and the measures adopted by all the companies involved will be informed to the investigating committee

9. Dissemination of the Protocol and training actions

This Protocol shall be available on Switchboard and in the office.

Likewise, the Protocol shall be the object of appropriate communication and awareness-raising actions for its timely understanding and implementation. In this sense, it will continue to promote training actions on equality, prevention of harassment, non-discrimination and defense of Human Rights among all its staff, especially among those who are responsible for working groups.

10. Updating and revision of the Protocol

The period of validity or duration of the protocol for the prevention of and action against sexual harassment and harassment for reasons of sex, as well as the deadlines for its revision, shall be those determined in the equality plan in which it is integrated, in the terms provided for in article 9 of RD 901/2020, of 13 October. Likewise, the provisions of this same article shall apply to the monitoring and evaluation of the protocol that forms part of the equality plan.

Annex

Template COMPLAINT MODEL DUE TO SEXUAL Harassment AND/OR Gender Based Harassment

1. COMPLAINANT (REPORTING PERSON) (check)

- Person who has suffered harassment
- Others (specify):

2. PERSONAL AND PROFESSIONAL DATA OF THE PERSON WHO HAS SUFFERED THE HARASSMENT

- Name and surname:
- Sex:
- Job:
- Workplace:

3. PERSONAL AND PROFESSIONAL DATA OF ADDITIONAL PERSON WHO HAS SUFFERED THE HARASSMENT

- Name and surname:
- Sex:
- Job:
- Workplace:

**4. PERSONAL AND PROFESSIONAL DATA OF THE ALLEGED HARASSER(S)
(REPORTED PERSON(S))**

- Name and surname:
- Sex:
- Job:
- Workplace:

5. DESCRIPTION OF THE FACTS

Include an account of the reported facts, attaching the numbered pages that are necessary, including dates and places where the facts took place and the people involved whenever possible.

.....
.....
.....
.....
.....

6. POSSIBLE WITNESSES AND/OR EVIDENCE

- If there are witnesses, indicate their names and surnames:

.....
.....

- In the event that there is evidence attached, any means of proof that are considered appropriate.

.....
.....

7. REQUEST

For the attention of the investigating committee, a complaint or complaint of sexual and/or gender-based harassment is filed and the procedure provided for in the Protocol for the Prevention of Sexual Harassment and Harassment by Reason of Sex of Twilio is initiated Spain, S.L.

.....
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.....
.....
.....

LOCATION AND DATE

.....

SIGNATURE OF APPLICANT

.....

[The complaint or complaint may be submitted in writing and by telephone to a member of the Human Resources Team or to the Ethicspoint Confidential Ethics and Complaints Line. Likewise, the complaint or complaint may be filed with the HRBP or the email address hr@twilio.com]