

SEXUAL AND GENDER-BASED HARASSMENT POLICY

Scope:

Office/homeworking staff /
Customers and Suppliers

Distribution:

General

Executive Area:

Inquiry Committee Members /
Global Talent Director /
Regional Talent Directors

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Contact:

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AIMS

The present Sexual and Gender-based Harassment Policy of the Group of companies whose parent company is Llorente & Cuenca S.A. (hereinafter referred to as "LLYC") has been drawn up for the following purposes:

- Endorse the commitment to respect and dignity for everyone by promoting a workplace free of sexual and gender-based harassment.
- Guarantee a work environment respecting the dignity of each and every individual.
- This Policy shall be accompanied by the pertinent training processes to increase knowledge and identification of the different ways in which situations of sexual or gender-based harassment may arise.
- This Policy provides tools to support and prevent sexual and gender-based harassment.

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PURPOSE

LLYC is firmly committed to eradicating any and all forms of harassment, violence and discrimination against individuals, including sexual and gender-based harassment.

Harassment, violence and discrimination, in its different manifestations, is a widespread problem in our society and negatively affects the health, development, autonomy, safety and life of its victims.

As part of its commitment, LLYC promotes practices that make the work environment a welcoming, respectful, healthy and safe space for everyone who is part of it, and is therefore pledged to ensure workplaces free of any form of harassment, violence and discrimination, including sexual and gender-based harassment.

LLYC therefore has developed and promotes this Sexual and Gender-Based Harassment Policy and is committed to providing workplaces that contribute to the eradication of all forms of sexual and gender-based harassment.

SCOPE AND APPLICATION

This Policy covers the conduct of everyone at LLYC, in all roles, work settings and in relation to anyone, including, but not limited to: suppliers, collaborators and customers.

APPLICATION

This Policy applies to anyone who is part of LLYC. Everyone must report any situation of sexual or gender-based harassment they witness (or are aware of).

In turn, LLYC leadership is expected to actively promote respect in the workplace, and foster a positive environment in which people treat each other respectfully.

WORKSPACE APPLICATION

This Policy applies to any activity in connection with LLYC, including activities carried out:

- At work (whether at the office, outside work meetings, at the customer's office, or any other LLYC-related workplace).
- On business trips.
- At LLYC-related social events (including meals or events with colleagues and/or events sponsored by customers), corporate events (whether or not organized by the company) and/or events attended as a representative of LLYC.
- In a training or instructional program (including training at locations outside LLYC's offices).
- In a public situation (such as public areas, networks or other virtual spaces) when a relationship with LLYC can be identified.
- At home, when personnel are teleworking or on break.
- In rest areas, canteens, toilets, sanitary facilities, etc.

GUARANTEES

- **Preventive Purpose:** The purpose of the Policy is preventive and seeks to prioritize measures aimed at avoiding possible conflict situations that could arise between workers.
- **Confidentiality and Anonymity:** Everyone involved in any phase of the procedure must maintain strict confidentiality and discretion, and must not disclose or reveal information they know about the content of the complaints filed, resolved, or during the inquiry.
- **Diligence and Expediency:** The inquiry and resolution concerning the reported conduct must be undertaken with no undue delay, so that the procedure can be completed in the shortest possible time, observing all due safeguards.
- **Training and Information:** Everyone involved in procedures must be trained in equality and conflict resolution.
- **Respect and Dignity:** The company shall take appropriate measures to ensure the right to protection of the dignity and privacy of the affected persons, including the persons allegedly harassed and/or harassers. Guaranteeing the process a fair hearing and fair treatment for everyone.
- **Data Protection:** All data protection regulations will be duly observed.

POLICY FRAMEWORK AND COMPLIANCE

The following is a series of concepts and definitions that frame compliance with this Policy.

SEXUAL HARASSMENT

LLYC adopts the definitions provided by the European Parliament and the Council, and Spanish law,

notwithstanding the adaptation of the individual national legislation of each country:

- Sexual harassment is “where any form of unwanted verbal, nonverbal or physical conduct of a sexual nature occurs, with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating or offensive environment.”
- Sexual harassment thus consists of action imposed without reciprocity, unexpected and unwelcome, which can have a devastating effect on the victim. It may include touching, insinuations, looks, shocking attitudes, jokes with offensive language, allusions to private and personal life, references to sexual orientation, insinuations with sexual connotations, allusions to figure and clothing, etc.
- In conclusion, it is an unexpected conduct of a sexual nature that affects the dignity of the person. It can be verbal or nonverbal, physical and unwanted behavior. A range of behaviors and conduct may constitute sexual harassment. Such conduct must be unexpected, unreasonable, unacceptable and offensive to the recipient.
- According to the ILO, three elements must be integrated for sexual harassment to occur:
 - Conduct of a sexual nature.
 - Unwanted.
 - The victim perceives it as a hostile condition for his or her work, making it humiliating. Sexual harassment is any type of approach or pressure of a sexual nature, both physical and verbal, unwanted by the person who suffers it, arising from the employment relationship and resulting in a hostile work environment, an impediment to perform tasks and a conditioning of the targeted person’s occupation opportunities.
- There are two types of sexual harassment, depending on whether or not the aforementioned conduct

involves an element of coercion:

- **Quid pro quo harassment:** It 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 this matter. To the extent that it involves an abuse of authority, its active subject will be whoever has the power, either directly or indirectly, to provide or withdraw a benefit or working condition.
- **Hostile environmental harassment:** The active subject of the harassment creates an intimidating, hostile, degrading, humiliating or offensive work environment for the victim, as a result of unwanted attitudes and behaviors of a sexual nature. It might be carried out by any LLYC member regardless of position or status, or by third parties located in any way in the workplace.

GENDER-BASED HARASSMENT

Similar to the previous section, LLYC adopts the definitions provided by the European Parliament and the Council, and Spanish law, notwithstanding the adaptation of the individual national legislation of each country:

- Harassment is said to occur where an unwanted conduct related to the sex of a person occurs with the purpose or effect of violating the dignity of a person, and of creating an intimidating, hostile, degrading, humiliating or offensive environment. It can also be defined as behavior that seeks to make a worker uncomfortable in order to keep him/her away from certain jobs that are considered typically masculine or feminine, constantly using allegations of a subject's gender to try to exclude him/her and keep him/her closed to certain jobs.
- Gender-based harassment can manifest itself in a variety of ways, such as the following:

- Ridiculing, disdaining the intellectual abilities and capacities of women/men just because they are women/men.
- Public and repeated disqualifications of the person and his or her work.
- Continuous and vexatious comments on physical appearance or sexual choice.
- Use of sexist humor with degrading content.
- Repeated use of offensive forms of address.
- Any adverse treatment or negative effect on a person as a result of the filing by him or her of a complaint, claim, complaint, suit or appeal, of any kind, aimed at preventing discrimination and demanding effective compliance with the principle of equal treatment between men and women, provided that it is not proven to be untrue.
- Any unfavorable treatment given to women that is related to their pregnancy or maternity, or to their own condition as women.
- Unfavorable treatment of women and men for the mere fact of being women or men. Assigning tasks or jobs below the person's professional capacity or competencies.

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WHISTLEBLOWING CHANNELS

Global:

Anonymous ethics mailbox (<https://escritorio.llorenteycuencia.com/codigoetica/buzon-etico/>)

Affiliates, Suppliers and Third Parties:

To develop an external contact.

INQUIRY

THE PROCESS:

- 1 Examination of the complaint
- 2 Interview with the whistleblower
- 3 Interview with the alleged offender (respondent)
- 4 Witness interviews
- 5 Drafting and approval of the inquiry report
- 6 Elevation of the inquiry to the management level
- 7 Resolution of the file and notification to the parties of the resolution

This Policy will ensure an objective reading, monitoring and resolution of all complaints made within LLYC. To do so, the Inquiry Committee will have a pre-established procedure and constant training with an external team. There will be a need to constitute an Inquiry Committee appropriate to the country where the complaint is lodged.

GENERAL PRINCIPLES OF THE PROCEDURE

Whenever a complaint of sexual or gender-based harassment occurs, LLYC guarantees the activation of the internal procedure detailed below, which will be governed by the following principles:

- Confidentiality and protection of the privacy and dignity of everyone concerned.
- Immediate processing.
- Professional and exhaustive investigation of the reported facts

LEGITIMACY TO INITIATE THE PROCEDURE

Anyone included in the scope of application shall be entitled to initiate the procedure provided for in this Policy whenever:

- That person is deemed to be affected by any of the harassing conduct described in this Policy.
- That person has become aware of alleged harassing conduct towards another person who is affected by the aforementioned scope.
- If the complaint was filed anonymously, proof or data will be required to provide reasonable credibility to the complaint.

STAGES OF THE PROCEDURE

INITIATION OF THE PROCEDURE

The procedure shall be initiated by filing the corresponding written complaint, which may be made using the [following model](#), or a private model. The complaint shall be filed with Talent Management.

This communication shall contain, at least, the following information:

- Involved persons
- Description of the alleged facts
- Dates and places where the conduct occurred.
- Possible witnesses.
- Identification of the potential victim of harassment.

The procedure must be as agile and efficient as possible, and the privacy, confidentiality and dignity of the persons concerned must be safeguarded at all times. Sufficient protection must be provided to the alleged victim in terms of safety and health, taking into account the possible physical and psychological consequences that may arise from the situation, paying special attention to the working circumstances in which he/she finds him/herself.

The complaint must be filed within a time limit of 3 months from the date of the complaint and, in the case of a series of complaints, within 3 months from the date of the last occurrence.

The strictest confidentiality shall be upheld throughout the procedure, and all internal inquiries shall be carried out tactfully and with due respect for both the whistleblower and the alleged victim (who shall not be treated unfavorably for this reason), and for the alleged offender, whose guilt shall not be presumed.

All persons involved in the process shall be bound to confidentiality, and shall be identified in the file by means of numerical codes to safeguard their identity.

AD HOC INQUIRY COMMITTEE

When the Talent Division receives a harassment complaint, an ad hoc Inquiry Committee will be formed, comprising four people, two from the company and two representing the employees, though this arrangement may be adapted to the pertinent legislation of each country.

A company representative will assume the role of investigator, with procedural freedom and sufficient initiative to direct the inquiry. This person will also

be in charge of drafting the conclusions report. The investigator should preferably be an expert in harassment issues.

The assistance from an independent attorney may be required.

For the sake of preserving the objectivity of the process, the Committee's composition must ensure that none of its members has been involved (directly or indirectly) in the case, or is directly affected by the complaint.

If the whistleblower or respondent believes that a member of the Committee is not impartial because he/she has had direct or indirect participation in the facts, he/she must notify the Committee accordingly. After deliberation, the Committee shall then resolve upon how to proceed in this case by majority vote. Dismissed committee members must be replaced, and the replacements must be elected by the same procedure as the original members.

EXAMINATION OF THE COMPLAINT

Once formally constituted, the Inquiry Committee will conduct a preliminary analysis of the reported case, reviewing all available documentation and information, and holding an initial interview with the whistleblower and, if necessary, with other(s) to make an initial approximate assessment of the facts.

The whistleblower should provide any additional evidence that he/she deems necessary to substantiate the complaint.

- The Inquiry Committee shall have 30 working days to assess the complaint.
- If immediate measures are necessary, they will be taken according to guidelines.

INTERVIEWS

The investigator will carry out as many diligences as he/she considers appropriate to clarify the alleged facts, with no other formality than granting a hearing to everyone involved.

The process should be completed in the shortest possible time, 7 working days at the most. The term shall be deemed to have begun when the whistleblower's statement is taken.

The inquiry may also include an analysis of psychosocial risk and follow-up reports, together with any other existing indicators.

During the process, the parties involved will be heard, and it may be necessary to interview witnesses or other persons of interest to the inquiry. The hearings shall be impartial and all parties involved shall cooperate in good faith to seek the truth and clarification of the alleged facts. Inquiries into the alleged facts must be conducted with the utmost sensitivity and respect for the rights of all parties concerned.

At the request of the Inquiry Committee, the Talent Department will adopt any precautionary measures deemed necessary, always with the aim of protecting the victim.

The Committee will collect data, testimonies, and the versions of the parties involved will be heard. In any case, confidentiality shall be maintained at all times. Everyone participating in the process shall be advised of their obligation to maintain the strictest confidentiality with respect to any information they may become aware of as a result of their participation in the process, in any capacity whatsoever.

- During the process, the parties involved (whistleblower, respondent, witnesses) will be heard, and it may be necessary to interview witnesses or other persons of interest to the inquiry.
- The hearings shall be impartial and all parties involved shall cooperate in good faith to seek the truth and clarification of the alleged facts. Inquiries into the alleged facts must be conducted with the utmost sensitivity and respect for the rights of all parties concerned.

INQUIRY CONCLUSIONS

The procedure will conclude with a report drafted by the Investigator within 3 working days. This report

must be as complete as possible and approved by a majority of Committee members. The report shall contain the following basic aspects:

- Case background.
- A summary of the corresponding diligences and evidence.
- Facts proven upon inquiry.
- Conclusions.
- Proposal for actions and applicable control guidelines.

The Committee Investigator will present the report at a meeting attended by the members of the Inquiry Committee, presenting the proven facts, proposed conclusions and recommendations.

After the presentation and Committee approval of the inquiry report, a copy of the report shall be sent to the Talent Division for its knowledge and filing, thus concluding the work of the Committee. All conclusions of the inquiry phase shall be made known to the parties concerned (whistleblower and respondent).

The inquiry report may conclude as follows:

- Confirming the existence of harassment and referring the matter to the Talent area so that the appropriate corrective measures can be adopted, applying the corresponding sanctions in accordance with the provisions of the Collective Bargaining Agreement and other applicable legislation.
- No confirmation of the existence of harassment or impossibility to verify the alleged facts, in which case the file will be closed and the procedure will be terminated.

Confirmation that the complaint was made in bad faith, or that the data provided or the testimonies are false (unfounded or false complaint), in which case the matter will be transferred to the Talent area so that the appropriate corrective measures can be adopted, applying the corresponding sanctions, in accordance

with the applicable legislation.

The Talent Division shall jointly with the company's management, after receiving the conclusions report from the Inquiry Committee, decide on possible disciplinary or disciplinary measures or the absence of such measures within 5 days.

The adopted decision shall also be communicated in writing to the victim and to the respondent, who shall maintain confidentiality regarding the information to which they have access.

No personal data will be given in these notifications to ensure confidentiality, and the numerical codes assigned to each of the parties involved in the file will be used.

The following penalties shall be considered among the sanctions to be applied to the aggressor, notwithstanding other actions:

- Transfer, relocation, job reassignment, change of position, working day or location
- Suspension of employment and pay
- Temporary limitations on promotion
- Disciplinary dismissal

The company's management will adopt the necessary preventive measures to avoid a recurrence of the situation by reinforcing training and awareness-raising actions and will carry out, among others, the following actions:

- Modification of working conditions that, with the prior consent of the victim of harassment, are deemed beneficial to his or her recovery.
- New training and awareness-raising measures for the prevention, detection and action against sexual and/or gender-based harassment, specifically for everyone working for the company.

RETALIATION

If the respondent engages in retaliatory or discriminatory acts against the whistleblower, the alleged victim or anyone else involved in the process (witnesses, colleagues, etc.), whether or not the existence of harassment, in any of its forms, has been determined, the corresponding disciplinary measures will also be taken.

VALIDITY OF THE PROCEDURE

This procedure is valid for the duration of the Sexual and Gender-Based Harassment Policy, and must be adapted to possible changes in applicable regulations.

ANNEX I: Sexual and/or gender-based harassment formal complaint form

ANNEX II: Non-disclosure agreement template for individuals involved in the process of processing and resolving complaints of sexual and/or gender-based harassment.

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RESPONSIBILITIES

All LLYC employees must comply with this Policy and cooperate to prevent and sanction any conduct of discrimination and harassment.

- **LLYC Leaders:** They are responsible for: implementing this Policy; ensuring that each work environment is a safe space free from discrimination and harassment; ensuring that their team members are aware of, understand and promote this Policy; reporting any suspicion of discrimination and harassment through the relevant channels; informing people about the whistleblowing channels and following up with the person until he/she has gone to the reporting instances; taking the necessary preventive, corrective and sanctioning steps in accordance with the conclusions of the pertinent authorities.

- **Talent Department, Legal Department and Inquiry Committee:** responsible for ensuring compliance with this Policy, initiating the appropriate inquiry into each case, reporting the results and conclusions of the inquiries to the parties and areas involved.

NON-COMPLIANCE WITH THE POLICY

Upon receipt of information, given in good faith, of a breach of this Policy, LLYC is committed to take immediate and effective measures to develop a thorough, fair and objective inquiry to account for the alleged facts. The inquiry will result in a report incorporating the conclusions of the inquiry and the measures proposed to be adopted by the company depending on whether the facts can be considered/typed as sexual or gender-based harassment.

LLYC LLYC is committed to conducting the inquiry under the principles governing this Policy in accordance with its legal obligations to respond to complaints, including investigation, sanctioning and educational measures.

Any disciplinary matters will be dealt with in accordance with local labor regulations establishing the scope and procedure for investigating and dealing with such matters.

LLYC

ANNEX



ANNEX I

SEXUAL AND/OR GENDER-BASED HARASSMENT FORMAL COMPLAINT FORM

SEXUAL AND GENDER-BASED HARASSMENT POLICY

If you are aware of any situation of sexual or gender-based harassment, please notify your Supervisor - Leader - Colleague - HR and/or Whistleblowing Channels.

Knowing the full circumstances will help investigate and resolve the issue, or help you how to address it yourself, if that is the best solution. There will be no retaliation for reporting any of the above acts, intimidation or other types of misconduct.

If you still prefer to report anonymously, please complete all information with whatever information you are comfortable with. Nevertheless, the more details we get, the more we will be able to help.

Date of occurrence:

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Location/Office:

Names of involved parties:

Harassment victim:

Witnesses (if known):

Full description of the incident(s) (Include detailed description of what happened, the context, location, date, time, whether there were witnesses, facts, how it made you feel and any other information you consider relevant).

Additional comments (Is there anything else you would like to add to this description?)

ANNEX II

NON-DISCLOSURE AGREEMENT TEMPLATE FOR INDIVIDUALS INVOLVED IN THE PROCESS OF PROCESSING AND RESOLVING COMPLAINTS OF SEXUAL AND/OR GENDER-BASED HARASSMENT

SEXUAL AND GENDER-BASED HARASSMENT POLICY

Don/Doña _____, having been appointed by (COMPANY/ENTITY NAME) to intervene in the procedure of reception, processing, inquiry and resolution of complaints of sexual and/or gender-based harassment that might have occurred, undertakes to observe the confidentiality, privacy, intimacy and impartiality of the parties throughout the different stages of the process.

Therefore, and more specifically, I hereby declare my commitment to comply with the following obligations:

To guarantee the dignity of individuals and their right to privacy throughout the entire procedure, and to ensure equal treatment between women and men.

To guarantee reserved treatment and absolute discretion in relation to information on situations that could constitute sexual and/or gender-based harassment.

To guarantee the strictest confidentiality and reserve regarding the content of the complaints filed, resolved or in the process of inquiry of which I have knowledge, and to ensure compliance with the prohibition of disclosing or transmitting any type of information by the rest of the persons involved in the procedure.

I also declare that I have been informed by (COMPANY/ENTITY NAME) of the disciplinary liability I may incur for failure to comply with the above obligations.

in on

Signed:

LLORENTE Y CUENCA