



**PROTOCOL FOR THE PREVENTION
OF HARASSMENT IN THE WORKPLACE**



TABLE OF CONTENTS

I.	Statement of principles	3
II.	Goal	3
III.	Scope of action	4
IV.	Preventive action	4
V.	Definition of concepts	4
	V.I Sexual harassment and harassment on grounds of sex.....	4
	V.II Moral harassment	6
VI.	How to proceed	7
	VI.I Establishment of the investigating committee for cases of harassment	7
	VI.II Triggering the Proceedings: The complaint or report.....	8
	VI.III The Preliminary Phase or Informal Procedure	8
	VI.IV The investigation dossier	9
	VI.V The Resolution of the Harassment Dossier	11
VII.	Follow-up	12
VIII.	Duration, enforceability and entry into force	12
IX.	Zitrón complaint or report form	13



I. Statement of principles

To be treated with dignity is the right of every working person. Consequently, ZITRÓN undertakes to create and maintain, with all the means at its disposal, a working environment where dignity is respected, as well as a healthy physical and psychological working environment, in which discrimination on grounds of sex or sexual orientation is not permitted.

According to the applicable Collective Bargaining Agreement, the following is considered to be very serious misconduct:

"Ill-treatment by word or deed, abuse of authority or serious disrespect and disregard for their employers, family members, colleagues or subordinates".

The rules governing preventive and corrective action for possible situations of harassment, in their various forms, are based on the following principles:

- The outright rejection of any harassment at work and the explicit rejection of any form or modality of harassment, regardless of who the victim or the harasser is.
- All employees have the right to an appropriate working environment, free of bullying problems and should be guaranteed support and assistance in situations of possible harassment. The appropriate disciplinary and corrective measures should be taken to prevent such a situation from recurring.
- They also have the right to be assured that complaints about such actions are dealt with promptly and with strict respect for privacy, confidentiality, objectivity and neutrality; aspects that are guaranteed by this Protocol.
- Consequently, any conduct or action involving harassment is expressly prohibited and considered a serious or very serious offence at work, leading to the disciplinary regime being applied as established in the Collective Bargaining Agreement.

II. Goal

ZITRÓN expressly declares its willingness to adopt, within the framework of its responsibilities, all necessary measures to ensure a healthy social and psychological working environment, free of harassment, by not tolerating or permitting such conduct.

Therefore, the purpose of this Protocol is to establish a procedure to be applied if a worker who detects or considers that he/she is being subjected to sexual harassment, harassment on grounds of sex, or moral harassment can make use of it to trigger the necessary actions to clarify the existence or not of the alleged harassment and the adoption of the relevant measures. Simultaneously, the Protocol will provide the appropriate mechanisms to address the problem if it occurs and prevent it from recurring.



III. Scope of action

All workers who provide their services within the scope of ZITRÓN's management, regardless of the type of employment contract they have, including interns or collaborators employed through temporary employment agencies.

IV. Preventive action

To prevent situations of harassment, measures will be promoted to avoid their occurrence, based on the principle that all persons have the right to privacy, due consideration of their dignity and non-discrimination in labour relations. These measures include the following:

- Dissemination: To raise awareness of this Protocol among all ZITRÓN staff, especially with regard to the procedure for reporting a possible situation of harassment, to raise awareness about the concepts of respect for dignity on which it is based, and to inform the companies that provide services at ZITRÓN of its existence.
- Training: To prevent situations of harassment and from the point of view of risk prevention, training plans will include this subject, particularly when they concern company employees who are in charge of other people. If deemed necessary, the investigating committee will provide specific training in this field.
- Commitment: All employees have a responsibility to help ensure a working environment in which dignity is respected. Likewise, any manager or person with responsibilities at ZITRÓN has an essential obligation to ensure that the working environment is appropriate and free of any conduct that could constitute harassment in accordance with the terms contained in this Protocol. For this reason, they should be responsible for ensuring and preventing harassment situations from occurring within their sphere by taking the necessary measures to prevent any conduct that could constitute harassment.

V. Definition of concepts

V.I Sexual harassment and harassment on grounds of sex

Sexual harassment is any behaviour, verbal or physical, of a sexual nature that is exhibited with the purpose or effect of violating a person's dignity and creating an intimidating, degrading or offensive environment.

Harassment on grounds of sex is any behaviour based on the sex of a person with the purpose or effect of violating their dignity and of creating an intimidating, degrading or offensive environment, as well as any adverse treatment or negative effect on a person as a result of their making a complaint, claim, or appeal aimed at preventing discrimination and demanding effective compliance with the principle of equality between men and women.



Making a right or an expectation of a right conditional on accepting a situation that constitutes sexual harassment or harassment on grounds of sex shall also be considered an act of discrimination on grounds of sex.

Sexual harassment includes:

- Sexual blackmail:
Sexual blackmail is when a person's refusal or submission to such conduct is implicitly or explicitly used as the basis for a decision that affects that person's access to vocational training, work, continued employment, career advancement or salary.

- Environment of sexual harassment:
Its main characteristic is that the perpetrators engage in conduct of a sexual nature of any kind, which has the intended or unintended consequence of producing an intimidating, hostile, offensive or humiliating work environment or context.

By way of example, but in no way excluding or limiting other options, and not intended as a closed list, the following conduct is related to sexual harassment:

1) Verbal behaviour: offensive sexual jokes and comments about the worker's physical appearance or sexual condition. Obscene sexual comments, questions, descriptions or comments about sexual fantasies, preferences and abilities/capabilities. Denigrating or obscene forms of addressing a person, spreading rumours about people's sex lives, and communications (telephone calls, emails, etc.) of a sexual or offensive nature. Behaviour that seeks to humiliate a worker because of their sexual orientation. Invitations or pressure to arrange sexual appointments or encounters. Invitations, requests or demands for sexual favours when they are directly or indirectly related to career advancement, improvement of working conditions or job retention. Persistent invitations to participate in social or recreational activities, even though the person has made it clear that such invitations are unwanted and unwelcome.

2) Non-verbal behaviour: The use of sexually explicit or suggestive images, graphics, cartoons, photographs or drawings. Obscene gestures, whistling, lewd gestures or looks. Offensive letters, notes or emails of a sexual nature.

Behaviour that seeks to humiliate a worker because of their sexual orientation.

3) Behaviours of a physical nature: deliberate and unsolicited physical contact (pinching, touching, unwanted massages, etc.) or excessive or unnecessary physical contact. Cornering or deliberately seeking to be alone with a person unnecessarily. Intentional or "accidental" touching of sexual organs.

Sexual harassment is distinguished from freely expressed and reciprocal approaches in that the harassment is unwanted by the person being harassed. Therefore, the nature of harassment will not be precluded by the fact that the person engaging in such conduct considers their behaviour as not offensive or annoying since the main characteristic of sexual harassment is that it is unwanted by the person being harassed. It is up to individuals to determine what behaviour is offensive to them.



Harassment on grounds of sex: The use of discriminatory conduct motivated by the fact of being a woman or a man. Jokes and comments about people taking on tasks traditionally carried out by people of the other sex. The use of demeaning or offensive language to address persons of a particular sex. The use of sexist humour. Ridiculing and belittling women's abilities, skills and intellectual potential. Engaging in the above conduct in relation to lesbian, gay, transgender or bisexual persons. Evaluating people's work in a disparaging, unfair or biased manner on the basis of their gender, sexual orientation or sexual identity. Assigning tasks or work below the person's professional capacity or skills. Unfavourable treatment on grounds of pregnancy or maternity. Any explicit or implicit conduct that involves restrictive or limiting decisions on a person's access to or continuation in employment, vocational training, pay or any other matter related to working conditions.

V.II Moral harassment

Moral harassment is understood as a situation of harassment within the context of an employment relationship in which a person or group of persons behaves abusively, in a hostile manner, whether verbally, psychologically, with gestures or otherwise, towards another, systematically attacking that individual, recurrently and over a prolonged period, to damage their reputation or means of communicating, to disrupt the performance of their work, to cause psychological or moral harm to the victim, with the aim of driving the person concerned to leave the job eventually. The following are necessary elements of moral harassment:

- Harassment or pressure, understood as any action that can be perceived objectively as an attack, whether it is exercised by a superior or a colleague or group of colleagues (vertical and horizontal harassment). However, not every action that causes tension or conflict in the workplace can be considered moral harassment. A distinction must be made between "mobbing" and other equally reprehensible behaviour, such as discriminatory acts or any abuse of power that may occur independently.
- An intentional or subjective element geared towards the moral harm of others within the scope of the company and as a result of the activity carried out in the workplace.
- The repetition of such conduct that takes place systematically and over a period of time. In other words, the behaviour must be repeated over time; otherwise, it does not amount to mobbing.

There are a variety of coercion mechanisms through which moral harassment can be manifested, some of which are common:

- Social isolation, such as preventing personal relationships with co-workers or customers.
- Persistent and negative behaviour or actions to impair personal or professional performance.
- Releasing workers from their responsibilities, e.g. by assigning them tasks that could be considered degrading.
- Aggressive behaviour towards the victim, e.g. belittling their work in the eyes of colleagues, spreading unfounded rumours about the worker or attributing to them mistakes they have not made and/or manipulating their reputation by creating a negative bias against them among their colleagues.



- Physical or verbal aggression, e.g. imitating the worker, mocking, insulting or constantly criticising the worker's personal life or making offensive comments to ridicule the worker in public.
- Behaviour or actions committed by one or more persons systematically and over time, taking advantage of the organisational system and aimed at harming the physical or psychological integrity of one or more persons, to undermine their reputation and seriously impair their ability to carry out their duties.
- Harassment carried out to harm the person who suffers it or cause them to leave the company.

VI. How to proceed

VI.I Establishment of the investigating committee for cases of harassment

An investigating and follow-up committee for cases of sexual and harassment on grounds of sex has been set up, comprising three persons:

Ouassim Kheyyali (Projects Dept/Works Committee)

Eva M. Suárez (Legal Dept.)

Carlos Zapatero (H&S Officer)

In the event of absence due to holidays, illness or any other legal reason, the following person may act as a substitute for any of the incumbent members:

José Carlos Morán (HR)

To ensure the utmost confidentiality of this procedure, the persons serving on this committee shall be permanent members.

The committee shall remain in force for three years. The aforementioned persons comprising this investigating committee shall strictly observe the principle of impartiality with regard to the parties concerned. Therefore, in the event of any consanguineous kinship or kinship by affinity with one or more of the persons affected by the investigation, intimate friendship, manifest enmity with the persons affected by the proceedings, or direct or indirect interest in the specific process, they shall refrain from acting. If despite these grounds for abstaining, such person or persons do not abstain, any of the persons affected by the procedure may request the disqualification of such person or persons from the committee.

In addition, this committee, acting either on its own accord or at the request of any of the persons concerned, may request the engagement of an external expert who may assist them in the investigation.

This committee shall convene within a maximum of 3 working days from the date it receives a complaint, allegation or knowledge of inappropriate behaviour in accordance with the procedure set out in this protocol.

The committee shall immediately and thoroughly investigate any report, notification, complaint or report of behaviour that could be considered sexual harassment or harassment on grounds



of sex. Complaints, allegations and investigations will be treated in strict confidence, consistent with the need to investigate and take corrective action, bearing in mind that these cases may directly affect the privacy and honour of individuals.

VI.II Triggering the Proceedings: The complaint or report

1) At ZITRÓN, the Legal Dept. is in charge of handling and processing any complaint or report that, in accordance with this protocol, may be filed by the people who provide their services in this organisation.

ZITRÓN employees should be aware that, except in cases of malice or bad faith, they will not be punished for activating the protocol. If you do so, any claim will be presumed to be truthful and will be handled by the person referred to above.

2) Complaints will be confidential but cannot be anonymous, and ZITRÓN will guarantee the confidentiality of the parties concerned.

3) To guarantee the confidentiality of any complaint, report or notification of a harassment situation, ZITRÓN provides the following email address canaldenuncia@zitron.com, to which only the person in charge of handling the complaint and the members of the investigating committee will have access. The sole purpose of this email address is to submit this type of complaint or report. This is without prejudice to the possibility of also accepting complaints or statements that may be submitted secretly, but not anonymously, in writing and in a sealed envelope addressed to the person in charge of handling the complaint. To protect the confidentiality of the procedure, the person in charge of handling the complaint will provide each of the parties concerned with a number code.

Upon receipt of a complaint through either channel, the person in charge of handling the complaint shall immediately bring it to the attention of the company's management and the other members of the investigating committee.

4) The form included in this protocol is made available to the company's employees so that they can submit a report or complaint. To activate the procedure, under the terms set out in the following paragraph, the victim of the case of sexual harassment or harassment on grounds of sex or any worker who knows such a case must submit the form by email to the address provided for this purpose or by filing a report of harassment in person.

VI.III The Preliminary Phase or Informal Procedure

This phase is optional for the parties and will depend on the will of the victim. This preliminary phase aims to resolve the harassment situation quickly and effectively to ensure the end of the harassment situation and to reach a solution acceptable to the parties.

Once the complaint or report has been received, the investigating committee will interview the person affected and may also interview the alleged aggressor, or both parties, request the assistance of experts, etc.



This informal procedure or preliminary phase shall have a deadline of seven working days from the date the investigating committee receives the complaint or report. Within this period, the investigating committee shall conclude this preliminary phase, assess the consistency of the complaint, indicate whether or not the purpose of the procedure has been achieved and, where appropriate, propose the actions it deems appropriate, including the opening of an investigation dossier. The entire procedure shall be urgent and confidential, and shall protect the dignity and privacy of the persons concerned. The investigation shall be confidential and shall be available only to the committee.

Notwithstanding the above, given a case's complexity, the investigating committee may skip this preliminary phase, proceed directly to the investigation process, and inform the parties of this fact. In addition, if the person being harassed is not satisfied with the investigation committee's proposed solution, an investigation dossier will be opened.

Should the investigation dossier not be pursued, the solution adopted at this preliminary stage shall be recorded, and the company management shall be informed.

Furthermore, the workers' legal representatives, the person responsible for occupational risk prevention, and the equality plan monitoring committee shall be informed. They must keep the information to which they have access confidential. In any case, to ensure confidentiality, no personal data will be provided, and the numerical codes assigned to each of the parties involved in the file will be used.

VI.IV The investigation dossier

If the preliminary phase is not activated or if the case has not been resolved using this procedure, the investigation dossier will be opened.

The investigating committee shall carry out an investigation, in which it shall decide whether or not the harassment reported has occurred. It shall hear the persons affected and witnesses proposed, hold meetings or request any necessary documentation, subject to the provisions on the protection of personal data and confidential documentation.

The persons summoned shall cooperate as diligently as possible.

During the processing of the case and at the proposal of the investigating committee, ZITRÓN's management shall adopt the necessary precautionary measures to bring the situation of harassment to an immediate end without such measures entailing any permanent and definitive prejudice to the working conditions of the persons involved. Apart from other precautionary measures, the management shall separate the alleged harasser from the victim.

In the proceedings, the victim shall be heard first and then the person against whom the complaint has been lodged. The parties involved may be assisted and accompanied by a person of their choice, whether or not that person is a legal and/or trade union representative of the workers, who shall maintain confidentiality regarding the information to which they may have access.



The investigating committee may, if it deems it appropriate, seek external advice on harassment and equality and non-discrimination issues during the investigation. This external expert is obliged to guarantee the utmost confidentiality with regard to everything that he/she may learn or have access to while participating in the conflict resolution committee in question and shall be subject to the same grounds for abstention and disqualification as the members of the investigating committee.

At the end of the investigation, the committee shall draw up a report stating the facts, the testimonies, the evidence given and/or collected, and concluding whether or not, in its opinion, there is evidence of sexual harassment or harassment on grounds of sex.

If, from the data gathered, there is evidence of harassment in the report's conclusions, the investigating committee will urge the company to adopt the appropriate disciplinary measures and may even, in the case of severe harassment, propose the disciplinary dismissal of the aggressor.

If the evidence does not reveal any signs of harassment, the committee shall state in the report that the evidence does not indicate the existence of sexual harassment or harassment on grounds of sex.

If, despite no harassment having taken place, an inappropriate action or a situation of violence that might be subject to disciplinary action is found to have occurred, the harassment investigating committee will also urge ZITRÓN's management to take the measures it deems appropriate in this regard.

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

The procedure shall be swift and efficient, and the privacy, confidentiality and dignity of the persons concerned shall be protected at all times. Throughout the entire proceedings, strict confidentiality will be maintained. All internal investigations will be carried out with tact and due respect for the complainant and/or the victim, who shall under no circumstances be treated unfavourably for this reason, and for the accused, whose proof of guilt requires the concurrence of evidence in the terms provided for in the labour regulations in the case of the violation of fundamental rights.

All persons involved in the process are obliged to act in strict confidentiality and to maintain professional secrecy with regard to all information to which they have access.

This formal investigation phase should take no more than ten working days. If there are reasons which, due to their complexity, require a longer period, the investigating committee may agree to extend this period, but in no case by more than three additional working days.



VI.V The Resolution of the Harassment Dossier

After receiving the conclusions of the investigating committee, ZITRÓN's management, the only body empowered to decide on the matter, will take the decisions it deems appropriate within 3 working days. The victim, the person reported, and the investigating committee shall be informed in writing of the decision taken, and they shall keep the information to which they have access confidential.

Furthermore, the decision finally adopted in the case will also be communicated to the equality plan follow-up committee and to the health & safety officer. To ensure confidentiality, these communications shall not include any personal data. The numerical codes assigned to each party involved in the case will be used.

Based on the result, ZITRÓN's management will proceed to:

- a) File the proceedings in the archives and write a report on the matter.
- b) Adopt any measures it deems appropriate on the basis of the suggestions made by the committee investigating the harassment case. By way of example, the following are some of the decisions that the company could take in this regard:
 - a) Physically separating the alleged aggressor from the victim by changing their workplace and/or shift or timetables. In no case shall the victim of harassment be forced to change his/her workplace, working hours or location within the company.
 - b) Notwithstanding the previous point, if appropriate, and depending on the results of the investigation, the aggressor will be disciplined in accordance with the table of offences and penalties set out in the collective bargaining agreement applicable to the company or, where appropriate, in Article 54 of the Workers' Statutes.

The penalties to be considered for the aggressor may include the following:

1. Transfer, relocation, change of workplace, working days or location
2. Suspension without pay
3. Time limitation on promotion
4. Disciplinary dismissal

If the penalty for the offender is not the termination of employment, ZITRÓN's management shall have a duty to actively supervise that employee when he/she returns to work (in the case of suspension) or in his/her new workplace in the case of a change of location. However, in all cases, the eradication of harassment will not end with the mere imposition of the transfer or suspension but will require subsequent follow-up and control by the company.

ZITRÓN's management will take the necessary preventive measures to avoid a recurrence of the situation. It will strengthen training and awareness-raising actions and will implement steps to protect the victim's health and safety, including the following:

- The evaluation of psychosocial risks in the company.
- The implementation of monitoring measures for the protection of the victim.



- The adoption of measures to avoid recidivism of offenders.
- Psychological and social support for the person that has been harassed.
- Changes to working conditions that, with the consent of the person who has been harassed, are deemed beneficial to their recovery.
- Training or retraining to update the professional skills of the person who has been harassed when that person has been on sick leave for temporary incapacity for a prolonged period.
- New training and awareness-raising actions to prevent, detect and act in the case of sexual harassment and/or harassment on grounds of sex, aimed at all persons providing their services in the company.

VII. Follow-up

Once the dossier has been closed, and within no more than thirty calendar days, the investigating committee shall perform a follow-up on the agreements adopted, i.e. on compliance with and/or the results of the measures implemented. The result of this follow-up will be recorded in a report, which will include the steps to be adopted if the events that triggered the proceedings continue to occur. The report will also examine whether the proposed preventive and disciplinary measures have been implemented. The report shall be sent to the company's management, to the legal and/or trade union representatives of the employees, to the health & safety officer, and to the equality plan monitoring committee, highlighting the safeguards indicated in the procedure regarding the confidentiality of the personal data of the parties concerned.

VIII. Duration, enforceability and entry into force

The contents of this protocol are mandatory and come into force on the date foreseen in the ZITRÓN equality plan on 29/07/2022 or, failing that, from the date of its disclosure to the company's workforce through the company's dissemination channels, website, email, Works Committee. It shall remain in force for the same period as the company's Equality Plan.

The protocol will also be reviewed in the cases and within the timeframe set out in the equality plan of which it is part.

This procedure does not preclude the right of the victim to file a complaint, at any time, with the Labour and Social Security Inspectorate, as well as with the civil, labour or criminal courts.



IX. Zitron complaint or report form

I. Person reporting the facts

- The person who has suffered harassment:
- Other (Specify):

II. Details of the person who has been harassed

Name:

Surname:

Id. Card. Num.:

Position:

Type of contract/employment relationship:

Telephone:

Email:

Address for notifications:

III. Details of the offender

Name and surname:

Professional group/category or position:

Work centre:

Company name:

IV. Statement of the facts

Include an account of the events reported, attaching as many numbered sheets as necessary, including dates on which the events took place whenever possible:



V. Witnesses and/or evidence

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

Attach any proof you consider appropriate (please indicate which):

V. Request

That the complaint or report of harassment against be considered to have been lodged, and the procedure set out in the protocol be initiated:

Location and date:

Signature of the person concerned:

To the attention of the Zitrón Harassment Investigation Committee.





HEADQUARTERS

Autovía AS-II, nº2386
Polígono de Rocas
33211 Gijón (Spain)
Tel. +34 985 168 132