



DCR-POLI-03

POLICY ON PREVENTION OF SEXUAL HARASSMENT, HARASSMENT BASED ON SEX, GENDER IDENTITY HARASSMENT AND SEXUAL ORIENTATION HARASSMENT

Owner: Compliance Executive Direction
Approved by / Date: October 28th 2024
ALEATICA's Executive Committee
Scope: This shall apply to all of the companies in which
ALEATICA SAU or ALEATICA SAB have a
controlling interest.
Document classification: Public

Related and applicable documentation

Code	Document name
	Code of Ethics and Conduct
RHS-POLI-01	Human Rights Policy
RHS-NORM-25	Psychosocial Risk Prevention Norm

Changes control

Review	Brief description of the change

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Definitions

For the purposes of this Document, the expressions "Sexual harassment", "Harassment based on sex", "Gender identity harassment" and "Sexual orientation harassment" shall have the definitions explained in section 3. Definition and conduct constituting sexual harassment, harassment based on gender and harassment based on sexual orientation of this Policy, without prejudice to the definitions established in each local legislation.

1. POLICY ON PREVENTION OF SEXUAL HARASSMENT, HARASSMENT BASED ON SEX, GENDER IDENTITY HARASSMENT AND SEXUAL ORIENTATION HARASSMENT

ALEATICA expresses its zero tolerance for any conduct that constitutes sexual harassment, harassment based on sex, harassment based on gender identity and harassment based on sexual orientation and formalises the following statement of principles, in the sense of highlighting certain conduct that is not tolerable in the company, in line with the provisions of our Code of Ethics and Conduct.

ALEATICA's guiding principles are:

- a. ALEATICA does not allow or tolerate conduct that may constitute sexual harassment, harassment based on sex, harassment based on gender identity and harassment based on sexual orientation in any of its manifestations, regardless of the rank or hierarchical level of the person who commits it.
- b. Ensure the objectivity, confidentiality, speed, equality, fairness, justice and truthfulness to any situation of sexual harassment.
- c. Guarantee respect and protection of the privacy, integrity, reputation and dignity of both the employee who is the alleged victim of the situation of sexual harassment, harassment based on sex, harassment based on gender identity and harassment based on sexual orientation and those of the alleged harasser.

To meet these principles, ALEATICA seeks to:

1. Prevent, not tolerate, combat, and prosecute any manifestation of sexual harassment, harassment based on sex, harassment based on gender identity and harassment based on sexual orientation.
2. Will punish, up to termination, both those who engage in offensive conduct and those who promote, encourage and/or tolerate it.
3. Encourage behaviours that respects human dignity, the right to privacy, the principle of equality and non-discrimination, by penalising any conduct that is contrary to these.
4. Guaranteeing a safe work environment that respects our values and business pillars, giving people confidence in the work environment in which they operate.
5. Comply with local regulations sexual harassment, harassment based on sex, harassment based on gender identity and harassment based on sexual orientation.
6. Promote a culture of mutual respect, tolerance and collaboration, encouraging our employees to report any inappropriate conduct through the appropriate channels, including the I Care ethics channel, and to lead by example.

2. SCOPE OF APPLICATION

The Policy and the local Protocols that develop it shall apply to situations of sexual harassment, harassment based on sex, harassment based on gender identity and harassment based on sexual orientation that occur from and towards any person during work, in connection with work or as a result of it:

- a. In workplaces, public or private, including, but not limited to: where employees are paid, where they take their rest or meal breaks, or where they use sanitary or toilet facilities, changing rooms, warehouses, rooms or spaces for the storage of cleaning materials, stalls, medical or sanitary offices, lifts or elevators, business transport.
- b. During work-related travel, trips, social, cultural, sporting, academic or training events or activities, inside or outside the office, attended by our employees, whether corporate or informal.
- c. In the context of work-related and non-work-related communications, including with devices, information and communication technologies such as e-mail, instant messaging or text messaging, social media or networks and other applications (virtual harassment or cyberbullying).
- d. In accommodation provided by ALEATICA.
- e. When travelling between the employee's home and place of work.
- f. In interactions between ALEATICA employees or between ALEATICA employees and third parties with whom ALEATICA has or may have any kind of relationship, e.g. suppliers, customers, business partners, public entities, etc., within or outside working hours.

3. DEFINITION AND CONDUCT CONSTITUTING SEXUAL HARASSMENT, HARASSMENT BASED ON SEX, HARASSMENT BASED ON GENDER IDENTITY AND HARASSMENT BASED ON SEXUAL ORIENTATION

3.1. Sexual harassment

Sexual harassment is any behaviour, verbal or physical, of a sexual nature that has the purpose or has the effect of violating the dignity of a person, in particular when it creates an intimidating, degrading or offensive environment.

For ALEATICA, sexual harassment is considered to be any conduct consisting of words, gestures, attitudes or concrete acts of a sexual nature or connotation, developed in connection with or as a consequence of a direct or indirect employment relationship, which leads to a state of defencelessness and risk for the victim, regardless of whether it is carried out in one or several events.

Conduct that constitutes sexual harassment includes, but is not limited to:

- a. Physical behaviours, which can range from deliberate and unnecessary touching to excessive physical approach. Examples of these behaviours are intentional or "accidental" touching, rubbing, slapping, or pinching and physical aggression, non-consensual hugs, or invasion of personal space.

- b. Verbal conduct, such as annoying sexual advances, propositions, flirtations, obscene advances or unwanted comments of a sexual nature and sexual content, jokes or comments about a person's appearance or appearance, denigrating or obscene ways of addressing people, questions, descriptions or comments about sexual fantasies and preferences, or exaggerated or inappropriate attention or kindness that manifests a sexual intentionality that one does not want to reciprocate.
- c. Non-verbal conduct, such as displaying photos of sexual or pornographic content or written materials of a sexual nature, repeated glances, gestures, or movements of a sexual nature that make people uncomfortable and/or disturbing or spreading rumours about people's sex lives.
- d. Sexual exchange or blackmail behaviours, these can be both proposals or behaviours made by a hierarchical superior or person on whom the stability of employment or the improvement of working conditions may depend, as well as those that come from colleagues or any other person related to the victim due to work, that involves physical contact, persistent invitations, requests for sexual favours, cornering or deliberately seeking to be alone with the person not justified, etc.
- e. Sexual cyberharassment: those sexual harassment behaviours that occur using information and communication technologies (digital platforms, social networks, WhatsApp, voice messages, photographs, and calls, among others). Face-to-face harassment and cyberbullying can interact with each other; however, sexual cyberbullying leave a digital footprint, i.e. a record that can serve as evidence to help stop the abuse and report it. Examples of these behaviours are sending a person videos or images with degrading content that violate their dignity and/or sexual freedom, disseminating images, videos, rumours or compromising data of sexual content (real or false) of a person on the internet, creating a false profile in the name of the victim to make sexual demands or offers or persecuting and making the victim uncomfortable in the online spaces they frequent on a regular basis.
- f. Other similar conduct or actions that create an intimidating, offensive, or degrading work environment for the people who suffer from it.

3.2. Harassment based on sex, harassment based on gender identity and harassment based on sexual orientation

A person's sex refers to the biological and physiological characteristics that define him or her. Gender identity, on the other hand, refers to a person's perception and manifestation of his or her gender, and sexual orientation refers to the sexual attraction that a person feels towards a particular group of people.

For the purposes of this Policy, the terms "sexual preference" and "sexual orientation" shall have the same meaning.

Harassment based on sex or gender identity is any behaviour carried out based on a person's gender with the purpose or effect of violating their dignity and creating an

intimidating, degrading or offensive environment. Any harassment based on sex or gender identity will be considered discriminatory.

Likewise, any behaviour carried out against a person on the basis of his or her sexual orientation constitutes harassment on the grounds of sexual orientation and shall in all cases be deemed to be discriminatory conduct.

In order to assess whether a situation can be qualified as harassment on the basis of sex, gender identity or sexual orientation, the following elements will be analysed:

- Harassment, understood as any intimidating, degrading, humiliating and offensive conduct that originates externally and is perceived as such by the person who suffers it.
- Objective attack on the dignity of the victim and subjectively perceived by the victim as such.
- Multiple offensive result. The attack on the dignity of those who suffer harassment based on sex, harassment based on gender identity and harassment based on sexual orientation 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 mental and physical health, etc.
- The reason for these behaviours must have to do with being of a particular sex or gender, because of circumstances that biologically can only affect one gender, or because of professing a particular sexual orientation.

The following are examples of conduct that, when based on a person's sex, gender identity or sexual orientation, constitute harassment on the basis of sex, gender identity or sexual orientation:

- a. Attacks with organisational measures, such as judging the person's performance in an offensive manner, concealing his or her efforts and abilities, questioning and disavowing the person's decisions without objective justification, not assigning any tasks, or assigning meaningless or degrading tasks, denying or concealing the means to perform the work or providing erroneous data, or assigning work far superior or far inferior to the person's competences or qualifications, or that require a much lower qualification than the one acquired.
- b. Actions that aim to isolate a person, such as changing the physical location of the person by separating them from their colleagues (isolation), ignoring the presence of the person, not speaking to the person, or eliminating or restricting the means of communication available to the person (telephone, email, etc.).
- c. Activities that affect the physical or mental health of the victim, such as threats and physical aggressions, verbal, or written threats, shouting and/or insults or frightening telephone calls.

- d. Attacks on personal or professional life and reputation, such as manipulating personal or professional reputation through rumour, denigration, and ridicule, implying that the person has psychological problems, trying to get them to undergo a psychiatric examination or diagnosis.

4. MEASURES TO PREVENT AND RESPOND TO SITUATIONS OF SEXUAL HARASSMENT, HARASSMENT BASED ON SEX, HARASSMENT BASED ON GENDER IDENTITY AND HARASSMENT BASED ON SEXUAL ORIENTATION

To prevent sexual harassment, harassment based on sex, harassment based on gender identity and harassment based on sexual orientation as well as any situation potentially constituting these behaviours, ALEATICA establishes the following measures:

- Disseminate and train all employees regarding the Policy for the prevention and action in situations of sexual harassment, harassment based on sex, harassment based on gender identity and harassment based on sexual orientation.
- Promote a safe and respectful workplace and provide our employees with the right guidance, tools, and environment to ensure that the only way to work is with integrity.
- Provide information and training periodically to employees on the principles and values that must be respected and on the behaviours that are not allowed in ALEATICA, specifically mentioning the non-tolerance of actions or omissions in relation to sexual harassment, harassment based on sex, harassment based on gender identity and harassment based on sexual orientation, internal reporting channels, the existence of local laws on the matter and the possibility of any victim of sexual harassment, harassment based on sex, harassment based on gender identity and harassment based on sexual orientation of go to legal instances.
- Where the situation so requires, implement immediate measures to ensure the protection of any actual or potential victim of sexual harassment, harassment based on sex, harassment based on gender identity and harassment based on sexual orientation, even prior to the completion of an investigation. To determine the appropriateness of these measures, the legislation of each country will be considered, and it will be evaluated whether the victim is in danger of suffering damage to his or her physical or mental integrity.
- Prohibit insinuations or manifestations that are contrary to the principles outlined above, both in language, communications and attitudes. It is not permitted to use any image, poster, advertisement, etc. that contains a sexist and/or stereotypical view of women and men.
- Provide support to victims of sexual harassment, harassment based on sex, harassment based on gender identity and harassment based on sexual orientation throughout the investigation process and once it has been completed.
- Collaborate with victims of sexual harassment or harassment based on sex or gender identity who decide to report the situations they have suffered to the competent authorities.

- When the analysis by the Compliance Direction or the local committees established to deal with this matter detects conduct in violation of this Policy and it is determined that it does not warrant an investigation, the People and Culture Executive Direction together with the Compliance Direction will immediately contact the person responsible for the group/team in which the conduct has been detected, in order to inform him/her of the situation detected, the obligations that must be respected and the consequences of non-compliance, and, if such conduct continues to occur, the need to take further action in accordance with this Policy and the relevant local Protocol will be assessed.

ALEATICA will maintain a constant activity in the adoption of new measures or in the improvement of the existing ones, in order to achieve an optimal coexistence at work, safeguarding the rights of the employees.

5. PROTOCOLS FOR DEALING WITH SITUATIONS OF SEXUAL HARASSMENT, HARASSMENT BASED ON SEX, HARASSMENT BASED ON GENDER IDENTITY AND HARASSMENT BASED ON SEXUAL ORIENTATION

This Policy shall be developed through local protocols for action and prevention of sexual harassment, harassment based on sex, harassment based on gender identity and harassment based on sexual orientation. These protocols shall establish short timeframes for the investigation process and in any case shall assess immediate measures to ensure the protection of any actual or potential victim of sexual harassment, harassment based on sex, harassment based on gender identity and harassment based on sexual orientation.

These protocols shall be drawn up in accordance with the legislation in force in each country to which they apply and shall be complementary to the provisions of this Policy.

In the event that local legislation in a specific country requires the appointment of a committee or body to receive and investigate reports of sexual harassment, harassment based on sex, harassment based on gender identity and harassment based on sexual orientation, such reports must be communicated to the Compliance Department upon receipt, which will advise and/or collaborate with said committee or body in the investigation of the facts and will assess the need to implement additional measures to those proposed by the local committee or body, in accordance with the provisions of local legislation.