

# Itínere



## ITÍNERE GROUP PROTOCOL AGAINST WORKPLACE, SEXUAL AND GENDER-BASED HARASSMENT, AND HARASSMENT AGAINST THE LGTBI+ COMMUNITY

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## 1. Implementing guidelines

Sexual and gender-based harassment are both forms of discrimination based on gender or sex (article 7.3 of Organic Law 3/2007, 22 March, for effective equality between men and women (LOI)), and can harm the mental and physical health and safety of victims.

Harassment or violence based on sexual orientation, gender identity and expression and sex characteristics are also considered discrimination and are subject to the Law on the real and effective equality and rights of LGTBI+ people (Organic Law 4/2023, 28 February).

General workplace harassment has been included the above law 3/2007, 22 March, and also in Organic Law 10/1995, 23 November, of the Criminal Code.

There are two approaches to dealing with harassment in the workplace, which must be used together. Firstly, a preventative approach is essential to avoid even having to implement this Protocol, the very existence of which should be taken as a warning that such conduct will not be tolerated. In the event harassment does happen however, a response is required and this Protocol is designed to be applied in such unfortunate cases.

Employers are under the obligation of taking every necessary measure to protect the health and safety of their workers (art. 14 of Law 31/1995, 8 November, on Occupational Health and Safety), which include both preventative and response policies, to prevent any cases from happening and to immediately respond to any that do.

## 2. Statement of principles

Workplace, sexual and gender-based harassment and harassment against the LGTBI+ community, which are expressions of violence that can happen in the workplace, constitute a flagrant violation of fundamental rights such as dignity, equality, physical and moral integrity, sexual freedom and the right to work and occupational health and safety. They are manifestations of historically unequal power relations between men and women and traditional gender roles. This sort of conduct must be prevented, and when it does happen it must be stopped and penalised to avoid harmful effects on the health of victims.

The Spanish Constitution states that individuals have the right to equality, non-discrimination, physical and moral integrity and specifically to non-discrimination based on sex in the workplace and the protection of occupational health and safety, rights which are also recognised in other international, European and Spanish laws. All employees of Itínere Group, led by its board of directors, firmly state that we do not tolerate this type of violence and any conduct of this type will be punished.



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This Protocol will be the procedure that must be followed to resolve claims and complaints filed regarding workplace harassment, sexual and gender-based harassment and harassment against LGBTBI+ persons, which must be fully enforced, as well as the necessary training and information so that all employees of the company are aware of the need to act with the utmost respect for these rights.

It will take into consideration any applicable international, European and Spanish regulations and declarations on the rights of workers to non-violence in the workplace.

The implementation of such a protocol does not exempt the company from its general occupational health and safety obligations, which of course include psychological health and safety. It must therefore evaluate any risks of sexual and gender-based harassment and harassment against LGBTBI+ people in the workplace and plan and implement the necessary measures to prevent any such harassment within the company.

### 3. Scope of application

All of the companies belonging to Itínere Group are under the obligation of guaranteeing the occupational health and safety of anyone who provides a service in the workplaces under its management, and must do everything in their power to ensure safe and healthy working environments. The Protocol will apply to anyone who provides a service in those companies, including managers, contractors or subcontractors, employees hired under a temporary employee staffing agreement and freelance workers.

In accordance with the rules on the coordination of business activities in article 24 of the Law on Occupational Health and Safety, information will be given to all internal and outsourced employees working at the company's workplaces, the companies who have sent their workers and the companies to which the company sends its own workers about the zero tolerance policy on all kinds of workplace harassment, and specifically sexual and gender-based harassment and harassment against LGBTBI+ people, and about this protocol. Those companies will also be under the obligation of informing their own employees about this policy and protocol to which they are subject, and they must state whether they themselves have implemented a protocol to be followed in the event of harassment when the perpetrator belongs to any of those companies, and that they will apply that protocol effectively should the need arise.

Itínere Group also undertakes to inform employees who are involved in training or similar programs, clients and suppliers about its corporate policy and protocol against harassment and the need for strict compliance.

If they are unable to fully implement this protocol because the perpetrator of the harassment is outside their scope of powers, a complaint will be raised with the appropriate company, before or at the same time as with the competent authorities, in order to respond to it and if necessary penalise the person responsible. Failure to do so will result in suspension or even termination of the business relationship between both companies.



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To prevent harassment in the workplace, Itínere Group will make this protocol available, first and foremost, through the following channels:

1. Itínere Group’s website and the websites of its member companies.
2. Any other appropriate channel. Itínere Group will provide special training for all of its employees on workplace, sexual and gender-based harassment and harassment against LGBTBI+ people. Itínere Group also has specially trained personnel to deal with reports of harassment.

Itínere Group encourages all of its employees to show respect and consideration, organising conferences and talks on this subject whenever possible, providing information and educational material and taking any action it considers necessary to comply with the purpose of this Protocol.

Employee representatives must also help to prevent workplace, sexual and gender-based harassment and harassment against LGBTBI+ people by raising awareness among employees and reporting any conduct that they come to know and that could lead to harassment to the company’s managers.

#### 4. Definitions

##### 4.0. Workplace harassment

The International Labour Organisation (ITL) defines workplace harassment as any:

*“Systematic, repetitive or persistent verbal or psychological behaviour in the workplace by a person or group of people towards a victim to harm, humiliate, offend or intimidate.”*

Workplace harassment is typically:

1. Systematic and takes place over a long time. Takes place at least once a week for more than six months.
2. Involves at least two parties: The harasser or harassers and the victim or victims.
3. Involves bullying. Destroys the reputation and social relationships of the victim and prevents them from doing their job, causing them to eventually leave the place of work.
4. Is related to the position the victim holds in the company and can be supervisor-subordinate (vertical) or peer-peer (horizontal). Vertical harassment can be top-down, if the harasser is a superior, or bottom-up if they are a subordinate.
5. Workplace harassment is a process. There are several stages from when the conflict starts until the victim is marginalised or excluded from the company.
6. It has psychological, physical and social consequences. For this reason, workplace harassment is currently considered a public health problem.

Types of workplace harassment and examples

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Workplace harassment can come in many forms. In some cases it is not even work-related, but simply manipulative and perverse behaviour.

Victims of workplace harassment can be subjected to degrading treatment including insults, shouting, public criticism and personal criticism that is not related to their work in any way, contradictory or vague work instructions that are confusing, being set tasks below their skill level, being disturbed during their free time, continuous changes to work hours, being overworked, and many others.

Some typical behaviour towards the victim includes:

- Changing the job terms and conditions, manipulating data or information, not providing equipment or tools and randomly changing tasks so that none can be completed.
- Ridiculing or spreading rumours about the victim.
- Mobbing: not speaking to a colleague or subordinate in the workplace, confining them or sending them to offices or areas far away from the rest of the team, subjecting them to psychological abuse and ‘blanking them.’ There are different types of mobbing:
  - Disciplinary: The aim is the generate a fear of dismissal or punishment.
  - Management: The aim is to improve performance.
  - Strategic: the aim is to get the victim to accept less compensation for dismissal.
- Power harassment. Harassment by a superior, such as the manager, team leader or supervisor.
- Moral harassment. This is a very subtle form of harassment and targets the victim’s state of mind.

#### 4.1. Sexual harassment

Sexual harassment is “where any form of unwanted verbal, non-verbal 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” (article 7.1 of the LOI).

Sexual harassment can be motivated by sexual desire, but ultimately it is driven by power as a result of the unequal power structures that exist.

Some examples of sexual harassment are:

- Making employment, conditions of employment or keeping a job dependent on sexual favours, implicitly or explicitly, even if the threat is not actually carried out (sexual bribery).

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- Unwanted physical contact (touching, brushing against the victim, hugging, pats, pinching...).
- Phone calls, letters, messages, photographs or other material with sexual content that is offensive to the recipient.
- Pressuring or coercing the victim into having sex.
- Threats of retaliation following refusal to engage in insinuated or requested sexual favours.
- Any of the types of sexual assault set out in the Criminal Code.
- Retaliating against anyone who reports, acts as a witness for, helps or takes part in harassment investigations and anyone who objects to such behaviour, either towards themselves or on behalf of others.
- Making obscene gestures, noises or movements.
- Asking questions about the victim's sex life.
- Inviting the victim on a date or persisting even when the answer is no.
- Getting too close to the victim repeatedly.
- Making it difficult for someone to move without physical contact.
- Making sexual innuendos.
- Continuously making comments or appraising the person's appearance.
- Directly asking for sex with no pressure.
- Spreading rumours about a person's sex life.
- Peeping at people in spaces like bathrooms or dressing rooms.
- Using pictures in the workplace and/or on work computers with degrading sexual content (suggestive or pornographic).
- Telling jokes or compliments of a sexual nature repeatedly, alluding to a specific person in front of others.
- Constantly talking about one's own sexual skills or abilities.
- Insistent and repeated stares or lascivious looks at another person's body, intending for the person to be aware that they are doing it.
- Questions, descriptions or comments about sexual fantasies, preferences and skills/abilities.





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#### 4.2. Gender-based harassment

“Gender-based harassment is any behaviour based on a person’s gender with the purpose or effect of violating the dignity of a person and creating an intimidating, hostile, degrading, humiliating or offensive environment” (art. 7.2 of the LOI).

Gender-based harassment can be by superiors, co-workers or subordinates and is caused by gender stereotypes. The purpose is usually to degrade a person on the basis of their gender and undermine their abilities and skills.

The following are just some examples of such unacceptable behaviour:

- Discriminating based on being a man or a woman.
- Directly discriminating due to pregnancy or motherhood.
- Belittling a person and their work, abilities, skills, etc. in public and/or in private based on their gender.
- Using sexist or degrading expressions that undervalue those skills (for example, “of course, you're a woman,” “the only thing you're good at is cleaning,” “get back to your chores, woman”...).
- Ignoring contributions, comments or actions due to a person’s gender (excluding or not taking seriously).
- Refusing to take orders or follow instructions from female superiors.
- Assigning a person to a job or tasks below their skill level, based on their gender.
- Sabotaging a person’s job or preventing them from accessing what they need to do it properly (information, documents, equipment, etc.) based on their gender.
- Treating a person as if they were a child or intellectually inferior (way of speaking or acting) based on their gender.
- Giving humiliating orders to a person due to their gender.
- Ridiculing people who do jobs traditionally fulfilled by the other gender.
- Randomly denying permission to which a person is entitled, based on their gender.

#### 4.3. Harassment against the LGTBI+ community

Harassment against the LGTBI+ community is any unpleasant behaviour (offensive, humiliating and/or intimidating) towards the victim that is related to their sexual orientation, gender identity/expression or sex characteristics.

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It can be in the form of words, gestures or publishing, displaying or circulating or displaying text messages, pictures or other material. It can happen once, or frequently. Harassment against the LGBTBI+ community can consist of threats, intimidation, verbal abuse or unwanted comments or jokes about sexual orientation and/or gender identity.

The following are just some examples of behaviour that, on its own or in combination with others, could constitute harassment based on sexual orientation, gender identity and/or gender expression:

- Discrimination due to self-identifying as a male or female or any of the different types of gender with which the worker wishes to be identified and treated.
- Flippant comments and the use of expressions that ridicule their physical appearance, mannerisms or way of dressing or talking.
- Belittling the person’s work, skills or intellectual potential and ignoring their contributions or actions or not taking these seriously on account of their sexual orientation, gender expression or gender identity.
- Treating people unequally because they belong to the LGBTBI+ collective.
- Ridiculing the person based on their sexual orientation, gender expression and/or gender identity.
- Using LGBTBI+-phobic humour or humour related to gender identity and expression in the workplace.
- Physically or verbally attacking another person because of their sexual orientation, gender expression and/or gender identity in any work situation.
- Throwing out people from certain bathrooms/dressing rooms due to their gender expression or identity or questioning their presence.
- Refusing to refer to a person by their chosen name and the articles or pronouns that match their gender identity, or purposely misgendering.

## **5. Principles, guarantee and procedure**

### **5.1. Principles**

The application of this protocol implies the observance of the following principles and guarantees.



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### 5.1.1. Principle of urgency

The process must be expedited and a maximum time limit established to solve any claims or reports filed. As well as this protocol, the protocol for Itínere Group's anonymous whistleblowing channel must also be followed if it has been used.

### 5.1.2. Principle of confidentiality and data protection

The procedure will be as quick and efficient as possible and will safeguard the privacy, confidentiality and dignity of anyone affected and who is protected under this anti-harassment protocol, as well as the Code of Conduct and the Itínere Group Compliance Channel regulations. Adequate protection will be ensured for the victim's health and safety, considering any possible physical and psychological consequences and paying close attention to the employment relationship between the victim and the alleged harasser. The whole process will be strictly confidential and any internal investigations will be undertaken with the appropriate discretion and respect for both the complainant and the victim (if they are different), who under no circumstances may be treated unfairly for this reason, and for the accused, who in accordance with the law will be presumed innocent, notwithstanding any provisional preventative measures which in no case will bring the conclusion of the investigations or the consequences forward. Anyone involved in the process will be bound by confidentiality and will be identified in the file, which will be kept by the head of the Compliance Area, who will oversee the investigation and who will be obliged to secrecy.

### 5.1.3. Principle of protecting privacy and personal dignity

The privacy of the victim and everyone else involved in the procedure will be protected. The necessary discretion will be exercised to protect the privacy and dignity of the people affected.

### 5.1.4. Principles of legal certainty, impartiality and the right to defence for all parties involved

The procedure guarantees an impartial hearing and fair treatment for everyone involved. Everyone who participates in the process is under the obligation of acting in good faith to find out the truth and clarify the alleged facts.

Everyone involved in the process is entitled to be informed about the company's procedure, their rights and obligations, the current stage of the process and, depending on their involvement (victim, witness or accused), what is required of them.

During the process, the people involved can be supported by a trusted colleague or colleagues, provided the supporting colleague is one of the participants in the process. That person will not be considered to be a representative of the people involved. Their involvement will be limited to witnessing the events that unfold.



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#### **5.1.5. Guarantee of indemnity**

No retaliation will be taken against anyone who reports, acts as a witness for, helps or takes part in harassment investigations and anyone who objects to such behaviour, either towards themselves or on behalf of others. Any measures that are taken that include unfair treatment of any of the parties involved (complainants, witnesses or contributors) will be considered invalid. If any retaliation has been taken against or harm caused to the victims or complainants during the process, they will be restored to at least their original situation, notwithstanding any other action they want to take as a result and the consequences therefrom. Submitting a false allegation is cause for severe penalties.

Any retaliation, which is completely prohibited under this protocol, should be reported to the Group through the anonymous, the corporate or the company's whistleblowing channel.

#### **5.1.6. Principle of cooperation**

Anyone who comes to know of any type of harassment must report it to the competent authorities. Anyone who is called to participate in this procedure must cooperate.

#### **5.1.7. Principle of support from trained professionals**

Itinere Group has staff trained in equality and anti-harassment policies and a gender-balanced Compliance Unit.

#### **5.1.8. Principle of preventing repeat victimisation**

Where possible, measures will be taken to avoid the victim of the alleged harassment having to make statements and describe the alleged behaviour on repeated occasions.

#### **5.1.9. Principle of reparation for the victim and the workplace**

Anyone affected by any type of harassment is entitled to claim compensation through the legal channels established. In addition, the company assumes a series of obligations, which include (but are not limited to):

- Supporting the victim in the workplace, taking measures to help restore the victim's job benefits.
- Putting measures and resources in place to reduce the risk of a repeat of non-tolerated behaviour that harms people's morale and dignity.

### **5.2. Whistleblowing**

Any Itinere Group employee or non-employee who has knowledge that harassment has taken place at any of its companies can use the following procedure to file a report to the competent body or individual(s) appointed for this purpose and who are listed below.



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Itinere has staff trained in equality and anti-harassment policies.

### 5.3. Official procedure

#### 5.3.1. Start of the process. Raising the complaint, pre-assessment and taking precautionary measures

Employees who suffer, witness or otherwise know about any form of harassment, whether workplace, sexual, gender-based or against LGBTBI+, i.e. any signs of behaviour that is prohibited under this protocol, can follow these steps to initiate proceedings:

1. Make a verbal complaint to their senior.
2. Make a verbal or written complaint to the head of the human resources department of the company for which they work.
3. Make a verbal or written complaint to the equality committee in the company for which they work.
4. Make an anonymous complaint to the Itinere Group Compliance Unit through the whistleblowing channel available on the corporate and Group website.

The complainant can choose any of these channels, regardless of the source of the alleged harassment. In cases 1 and 2, the case will be immediately forwarded to the Itinere Group Compliance Unit, through the head of Compliance.

The bodies with competent powers to settle this type of complaint are the Itinere Group Compliance Unit and the equality committee, if it exists. If the complaint has been filed to the equality committee (which will also be subject to this protocol) and it decides to handle it itself, it will immediately inform the head of the Itinere Group Compliance Unit of the complaint, and keep them informed at all times of the latest developments and outcomes, always protecting the rights of privacy, data protection and presumption of innocence of everyone involved. The Compliance Unit will immediately inform the company's management and the equality committee or any other equivalent body, if they exist, of the outcome of the procedure.

If any member of the overseeing body has any personal interest in the case and is therefore biased, for example, kinship, friendship or enmity, direct senior/subordinate relationship or any other direct relationship with the victim or accused, they will automatically be excluded from participating in the investigation and final decision. If this member is either an accused or complainant in any case, they will not be allowed to intervene in any other proceedings until their own case has been resolved. Not declaring a cause for exclusion from the proceedings due to any of the above conflicts of interest will be considered a serious offence.

#### 5.3.2. Itinere Group's anonymous whistleblowing channel

If an employee decides to use the Itinere Group anonymous whistleblowing channel, the Compliance Unit will handle the complaint. This Unit has the following powers and responsibilities:



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1. Receiving all complaints, claims, suggestions or queries related to harassment.
2. Agreeing on the precautionary measures deemed necessary.
3. Investigating allegations of workplace, sexual or gender-based harassment or harassment against LGBTBI+ people, compiling any documents as evidence and conducting any interviews as required, always guaranteeing strict confidentiality for the case and the people involved and fair treatment for them, by means of any measures deemed necessary.
4. Preparing a detailed report setting out the proposed actions to be taken, including the applicable disciplinary measures.
5. Sending this report within a maximum of 2 months, although the principle of urgency will apply as soon as Itínere Group receives the complaint, so that it takes the necessary action to solve the problem and establish the applicable disciplinary measures. A copy of this report will be also sent to the parties involved.

The protocol for using the Itínere Group compliance channel will apply, which is available on the corporate website and the websites of its subsidiaries.

### **5.3.2. Follow-up**

Each filed complaint will be regularly followed up, attaching a report of the actions taken. The members of the committee will receive special training on how to deal with harassment in the workplace.

The provisions of the following Itínere Group internal regulations will fully apply:

- Itínere Group Code of Conduct
- Protocol for using the compliance channel.
- Compliance Unit rules and regulations.

### **6. Investigation**

The investigator can take any action, within our legal framework, to clarify the facts, including interviews or other methods and using either internal or external resources, to gain useful information from the parties involved, witnesses or third parties. Similarly, it may be agreed to separate the parties involved from one another as a preventative measure, either physically or hierarchically.

The main purpose of the interview is to understand the current situation of the individuals affected and find out, among other things:

1. If there is or has been workplace harassment, and which type, the reasons, the stage it is in, etc.

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2. The individual or individuals thought to be engaging in this harassment and their hierarchical relationship with the victim.
3. In which situations the harassment takes place. If it occurs in the presence of other colleagues, and if so, how they reacted.
4. If the case has been brought to the attention of any higher authority, how (verbally or in writing) and the response received.
5. How the situation has affected the person's health, including whether they have needed support from a specialist or have taken leave in recent months, and for what reason.
6. If other colleagues have or have experienced similar issues, requesting additional information from them.

The following rules will apply to interviews under all circumstances:

1. Maximum respect will be given to the rights of privacy, honour and image. The investigator may accordingly decide that interviews can take place outside of work hours and away from the workplace.
2. In the event of a joint interview between the harassed victim and the accused party, it will only take place with the explicit permission of both parties.
3. If any party involved requests a meeting or interview, it will be granted. Similarly, upon request, the testifying employee will be allowed to be accompanied by a workers' representative of their choice, solely for the purpose of providing testimony, or if deemed appropriate, by other employees for the purpose of arranging testimonial evidence. The accompanying individuals will not have a voice in the interview.
4. All parties involved have the right to legal assistance at all times, being responsible for paying any applicable expenses and/or fees. Legal representatives will have a voice during the interview solely for the purpose of recording their statements in the statement record.

### 6.1. Writing the report

In order to compile the most comprehensive report possible on the investigation process, the Committee will gather the evidence it deems necessary, including: testimonials from those affected, involved parties, witnesses, etc.; written statements (which may include corporate or non-corporate e-mails); reports from specialists treating the affected individual (which will require explicit written authorisation from the individual); and any other evidence that provides useful information for the process. The minimum information to be included in the report will be:

1. Background of the case (summary of arguments presented by the involved parties).



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2. Overview of the investigator's actions and the collected evidence.

3. Summary of the main facts.

### 6.2. End of the process.

No retaliation will be taken against anyone who reports, acts as a witness for, helps or takes part in harassment investigations and anyone who objects to such behaviour, either towards themselves or on behalf of others. Any measures that are taken that include unfair treatment of any of the parties involved (complainants, witnesses or contributors) will be considered invalid.

If any retaliation has been taken against or harm caused to the victims or complainants during the process, they will be restored to at least their original situation, notwithstanding any other action they want to take as a result and the consequences therefrom.

Nevertheless, any complaints, allegations or statements that are proven to be intentionally fraudulent and malicious, with the intention of causing unwarranted harm to the accused party, will be subject to penalties as outlined in the disciplinary framework specified in the relevant collective bargaining agreement and current labour laws. This is in addition to any other legal actions that may be applicable.

If the inquiry fails to amass enough evidence to substantiate the complaint, especially when the complainant is the victim, they cannot be forced to work against their wishes with the accused party. The company's management pledges to help with job changes whenever possible.

The use of this procedure does not prevent the victim from seeking help from the labour inspection services or taking legal action through the appropriate procedure whenever they deem necessary. Likewise, in the event that there are indications of a crime, the company will immediately report knowledge of these facts to the competent authorities.

The procedure will conclude with a proposed resolution that will be forwarded to the Compliance Unit, which, if applicable, will provide the company's management with the appropriate instructions to implement the decision made. Similarly, preventive measures may be proposed to prevent the situation from recurring, which should be validated by the Health and Safety Committee, if available, or through any other body representing the workers with powers in this matter.

### 7. Types of offences and penalties

Any behaviour constituting harassment constitutes a violation of labour regulations subject to disciplinary sanctions. Regardless, the classification of offences and the imposition of sanctions will adhere to the terms outlined in the relevant collective bargaining agreement or an equivalent negotiated instrument, along with compliance with current labour legislation. In any case, harassment on the grounds of race or ethnicity, religion or beliefs, disability, age, or sexual



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orientation is classified as a **SERIOUS** offence, as well as sexual harassment or gender-based harassment, and LGBTI+-phobic harassment.

With the purpose of assessing the severity of the actions and determining the applicable sanctions, aggravating circumstances will include situations in which:

- The abuse of a senior position or the fact that the harasser has decision-making powers over the working conditions of the victim or their employment relationship.
- Continued offensive behaviour after the victim has sought resolution.
- The harasser has a history of committing harassment.
- There are two or more victims.
- The victim has some type of physical, mental, or sensory disability.
- The victim's mental or physical health has significantly deteriorated, and is medically documented.
- Demonstration of intimidating or retaliatory behaviour by the harasser towards the victim, witnesses, or confidential advisory service.
- The harassment occurs during the recruitment or promotion process.
- Pressure or coercion is exerted on the victim, witnesses, or individuals in their work or family environment in order to prevent or hinder the successful conclusion of the investigation.
- The victim is undertaking temporary employment, an interim position, a probationary period, an internship or practical training. The sanctions based on the principle of proportionality may be as follows, according to the above agreement:
  - Temporary or permanent loss of the job category
  - Suspension of employment and salary for a period ranging from eleven days to two months
  - Disqualification for two years or permanently moving to another job category
  - Dismissal for disciplinary reasons

When, as a result of the procedure established in the protocol and after the initiation of the disciplinary proceedings, a sanction other than dismissal for disciplinary reasons for the harasser is imposed, the harasser shall be required to complete a training course with the content specified in the Raising awareness, informing and training section of this Protocol.

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Similarly, if the investigation during the procedure proves that other employees were aware of or had witnessed acts of harassment and had not reported them, they shall:

- Receive the appropriate reprimand, which may be verbal or in writing. In the latter case, a record of it will be kept in the employee's work file, and
- they must also complete a training course on workplace harassment.

### **8. Disclosure policy**

It is absolutely essential to ensure that all staff members are familiar with this Protocol. The protocol will be disseminated by attaching it to or including it in the company's orientation manual, distributing a circular to all employees, publishing it on the corporate website, and, if applicable, on the intranet. If these resources are not available, the information will be shared through bulletin boards.

As part of coordinating activities (art. 24 LPRL), the protocol will be shared with any contracted service provider and self-employed workers, specifying the obligation to implement the same measure in the case of authorised subcontracting.

### **9. Raising awareness, informing and training**

The company will ensure that its informational and training policy on equality and occupational health and safety includes appropriate training on equality and preventing workplace violence at all levels (employees, executives, middle management and workers' representatives at both individual and collective levels, including unions and those specifically related to occupational health and safety).

The training must include:

- Identifying behaviour that constitutes harassment.
- The effects on the victim's health.
- The adverse impact on the working conditions of the individuals experiencing it.
- The harmful effects for the company.
- The obligation to respect fundamental rights (right to human dignity, equality, physical and moral integrity and sexual freedom), the right to gender self-determination, as well as the right to health and safety at work, and the right to work.
- The prohibition of engaging in behaviour constituting harassment.
- Disciplinary measures for cases of harassment.
- The company's responsibilities, especially those arising from the employment relationship and occupational health and safety.



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- Procedure of action outlined in the Protocol.

## 10. Evaluation and follow-up

The Itínere Group Compliance Unit will monitor the filed complaints and the resolution of cases with the aim of producing a follow-up report on the implementation of this protocol in its subsidiaries every two years. If there are any updates, this report will be presented to senior management and the representative bodies for occupational health and safety and equality.

## 11. Information for victims

Potential victims will be informed about the public services available in their respective Autonomous Communities to ensure proper protection and recovery. The equality committee or an equivalent body will provide information about these resources.

## 12. Miscellaneous provisions

### 12.1.1. Protecting victims

If harassment is confirmed in any form and the imposed sanction on the harasser does not lead to their departure from the company, or the situation is not reported to the competent authorities (state security forces and bodies, public prosecutor's office, or courts), appropriate measures will be taken to prevent the harasser and the victim from working in the same environment, whenever possible. In implementing these measures -which must not lead to any improvement or detriment to their contractual conditions- priority will be given to the individual proven to be a victim of harassment.

### 12.1.2. False allegations

In the same way as it has a zero-tolerance policy towards cases of harassment, Itínere Group will not tolerate misuse of this policy. It will be unwavering when faced with clearly baseless complaints or those driven by ulterior motives and stemming from personal grievances, disputes, or quarrels.

### 12.1.3. Retaliation

Any employee who makes use of the provisions contained in this anti-harassment policy will be protected as outlined in this document, in the Code of Conduct, in the Compliance Channel regulations, and, where applicable, in equality or anti-harassment policies or plans that may be applicable.

## 12.2. Data protection

The data protection commitments outlined in the Itínere Group Compliance Channel regulations will be applicable for these purpose The unauthorised disclosure of data from any of the initiated procedures by anyone participating as a complainant, victim, witness, accompanying person,



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investigator, etc., will be considered a breach of contract subject to disciplinary action, as provided in the collective bargaining agreement or applicable labour legislation.

### 13. Miscellaneous

In order to emphasize the key points of the Protocol, the principles governing this matter at all times are summarised below:

1. Itínere Group will not tolerate any form of workplace harassment, whether it be based on work-related reasons, sexual orientation, gender self-identification, or, in general, involves the disregard for the rights and freedoms of the LGTBI+ community.
2. All members and employees of the companies within Itínere Group are responsible for collaborating to ensure a work environment free from any form of harassment in the broadest sense.
3. In the face of a complaint, discretion will be exercised to preserve the dignity and privacy of all parties involved.
4. Complaints and grievances, which may be anonymous, will be investigated and analysed without undue delay, in an efficient and reliable manner.
5. All individuals affected will be heard and supported at all times.
6. All involved parties will receive impartial treatment, and the accused will not be presumed guilty under the common principle that the burden of proof, at least circumstantial, lies with the complainant.
7. Complaints will be based on information that constitutes reliable and detailed evidence.
8. False accusations and retaliations stemming from personal grievances will not be tolerated and may be subject to disciplinary measures in accordance with labour legislation. Above all, the health and safety of individuals will be protected, and measures deemed appropriate may be taken in each case.

### 14. Interpretation

The Itínere Group Compliance Unit will be the sole and competent body for interpreting the content of this protocol.

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