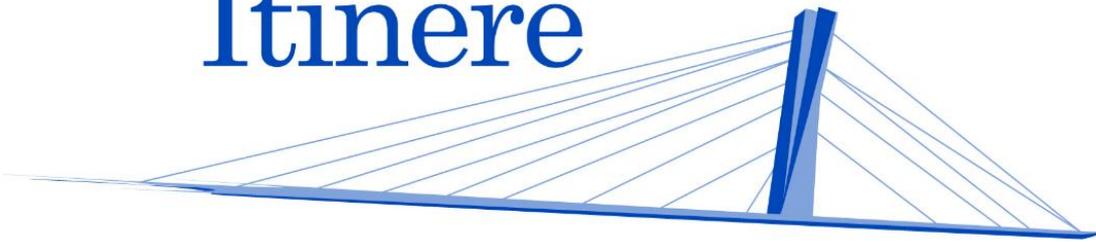


ANTI-HARRASMENT PROTOCOL

Itínere



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SGRP-Protocol-Anti-Harrasment Protocol



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PROTOCOL FOR ACTION IN THE CASE OF HARASSMENT IN THE WORKPLACE

INTRODUCTION

The Compliance Unit from ITÍNERE GROUP has approved this "Protocol for action to prevent harassment in the workplace (hereinafter "Protocol") as part of its commitment to prevent sexual harassment, gender-based and/or mobbing, since such actions are detrimental to human dignity, prejudicial to the workplace environment and have undesirable impacts on people's health, well-being, confidence and self-esteem. To this end, this Protocol defines the types of behaviour that are unacceptable, setting out specific measures to ensure their prevention and to provide a route for complaints or any claims that may be made by victims of such behaviour. It has therefore set up an effective and swift investigation procedure that will be triggered when a complaint is lodged about any behaviour of this nature; confidentiality, and the anonymity of those affected, as well as of all those involved in the procedure, will be guaranteed.

This protocol is aimed to be applied to ENA and Itínere and supersedes all provisions that may exist for these purposes in the rest of the companies comprising the ITÍNERE Group.

1) PRINCIPLES

To ensure the protection of the fundamental rights of the person, as part of its robust commitment to comply with the applicable regulation in this area, ITÍNERE GROUP understands that harassing conduct at work needs to be prevented and any behaviour that could be construed as representing harassment in the workplace should be stopped. Sexual harassment, gender harassment and psychological harassment are completely forbidden in the ITÍNERE GROUP, viewed as entirely unacceptable in our organization. To that end, ITÍNERE GROUP is committed to ensuring that everyone who has a direct working relationship with our Group enjoys a respectful working environment, in which the right to equal treatment, non-discrimination, dignity, privacy and personal space, among other fundamental principles, are upheld at all times, and to adopting such corrective and disciplinary measures as may be necessary to protect those negatively affected when these principles are breached.

2) SCOPE

The protocol applies to all working persons providing services in any of the companies comprising the ITÍNERE GROUP. The scope of the harassment in any of its manifestations will be the workplace; thus, if the breach occurs outside the same it should be made clear that the situation is for a reason directly relating to work.

3) DEFINITIONS AND PREVENTIVE MEASURES

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3.1. DEFINITIONS

3.1.1. SEXUAL HARASSMENT

Sexual harassment is defined as any behaviour of a sexual nature, whether verbal or physical, that has the purpose or produces the effect of infringing the dignity of another person, particularly when it creates an intimidating, degrading or offensive atmosphere. Sexual harassment is different from freely accepted and reciprocal approaches, inasmuch as sexual harassment behaviours are not wanted by the person who is the object of them.

3.1.1.1. CONDUCT CONSTITUTING SEXUAL HARASSMENT

Verbal conduct: intrusive sexual insinuations, propositions or pressure to engage in sexual activity; insistence on participating in social activity outside the workplace, after the person who is the object of the same has made it clear that this insistence is annoying and inopportune; offensive flirting; insinuating comments, innuendos or obscene comments; unwanted phone calls; jokes or comments about anyone's physical appearance. Non-verbal: Exhibiting sexually suggestive or pornographic photos, objects or texts, lascivious looks, wolf whistles or making certain gestures; letters or email messages of an offensive nature, with sexual content. Physical: Deliberate and unsolicited physical contact, unwanted hugs or kisses, excessive or unnecessary physical closeness.

3.1.1.2. TYPES OF SEXUAL HARASSMENT

Two types of sexual harassment are distinguished depending on whether the behaviours described above entail coercion or not:

"Quid pro quo" harassment

Consists of forcing the victim to choose between submitting to sexual requirements, and losing or running the risk of losing certain advantages or working conditions that may impinge on: access to professional training, continuation of employment, promotion, salary or any other decision relating to working conditions. Inasmuch as the harassment represents abuse of authority, the active party is the one holding the power, directly or indirectly, to offer or withdraw a job advantage or condition.

Ambient harassment

The active party in the harassment creates an intimidating, hostile, degrading, humiliating or offensive work environment for the victim, as a consequence of unwanted attitudes or behaviour of a sexual nature. This may be carried out by any member of the ITÍNERE GROUP, whatever their position or status, or by third parties located in any sense on company premises.

3.1.2. HARASSMENT FOR GENDER REASONS



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Any behaviour practised because of a person's sex or sexual orientation with the aim or effect of infringing upon their dignity or of creating an intimidating, degrading or offensive environment.

3.1.3. MOBBING

The terms "mobbing", "bullying in the workplace" and "psychological harassment in the workplace" are used to describe a situation in which a person or group of people engage in a series of behaviours of an extremely violent psychological, abusive and unfair nature, systematically, repeatedly and over a long period of time, towards another person in the workplace, that is liable to harm their dignity as a human being. We should note here that certain hostile action may occasionally occur in the workplace; for this to constitute psychological harassment such action must be, as described above, systematic, habitual, continue over a certain period of time and be targeted at one person. As such, situations of workplace pressure or conflict should not be confused with bullying. In the former, these are situations where there is disagreement, since at work there may well be confrontation, arguments and occasional conflict. Mobbing, on the contrary, consists of a malicious, systematic attack that is maintained over time against one person.

3.2. PREVENTIVE MEASURES

To prevent and avoid harassment scenarios in the ITÍNERE GROUP, this Protocol will be given priority distribution, using:

1. The ITÍNERE GROUP corporate website.
2. Any other medium that can help to achieve this aim. ITÍNERE GROUP will provide ad hoc training for all members of its organization on sexual harassment, gender harassment and mobbing. In particular, the ITÍNERE GROUP will provide appropriate training to those members of its organization with any competence in the complaint procedures for these behaviours.

Furthermore, the ITÍNERE GROUP is committed to fostering respect and considerate behaviour among all its co-workers, and promotes specific workshops and talks on the subject, preparing information materials and pushing through any action it believes is needed to comply with the aims of this Protocol. This Protocol will be updated as often as is necessary so that all members of the ITÍNERE GROUP are made aware and take responsibility for helping to ensure that the workplace is an environment where the dignity of everyone in the organization is respected.

Workers' representatives must contribute to preventing sexual harassment and gender harassment in the workplace by making workers aware of these issues and by drawing management's attention to conduct or behaviour they know about that could be conducive to such harassment.



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3.3. ACTION PROTOCOL

3.3.1. COMPLAINTS PROCEDURE

The complaint should be made by the person affected or by a third party who knows about the sexual harassment, gender harassment and/or mobbing, using ITÍNERE Group's [whistleblowing hotline \(https://www.grupoitinere.com/canal-de-cumplimiento/\)](https://www.grupoitinere.com/canal-de-cumplimiento/), following the protocol there and the guidelines in this document. Only in cases of maximum urgency, in which vital interests that must be especially protected are endangered, will a verbal complaint to a line manager or to the Human Resources Department be admissible, solely for the purpose of adopting such short-term safety measures as are considered necessary; the complaint must subsequently be lodged formally in order to initiate such investigative procedures that may be required.

3.3.2. CONFIDENTIALITY AND PROTECTING THE AFFECTED PARTIES

The procedure should be a swift and efficient as possible and, in any event, should protect the privacy, confidentiality and dignity of the affected parties. They are covered both by ITÍNERE Group's Code of Conduct and the regulations over the use of the Whistleblowing hotline, and also by the provisions in this anti-harassment protocol. Likewise, care will be taken to protect the victim's safety and health, bearing in mind the possible consequences, physical and psychological, of their situation, with particular attention being paid to the working circumstances of the presumed harassment victim vis-à-vis the presumed perpetrator. Strict confidentiality will be maintained throughout the procedure and all internal investigations will display proper caution and respect towards both the complainant and the victim (where these are two different people), who shall under no circumstances be discriminated against because of the complaint; and also towards the defending party. The latter will be covered, as per our legal system, by the presumption of innocence; this will not preclude the possible imposition of certain provisional precautionary measures, but these will in no way anticipate the conclusion of the investigations. Everyone involved in the process will be subject to conditions of confidentiality, and will be identified in the file that will remain secret under the responsibility of the Head of the Compliance area who will, unless directly or indirectly involved in the matter, be the instructor of first resort in the investigation.

3.3.3. HARASSMENT PREVENTION COMMITTEE

ITÍNERE Group's Compliance Unit will take on the responsibilities of the Harassment Prevention Committee.

This Committee's competencies/responsibilities are:

1. To receive all accusations, complaints, suggestions and queries about harassment situations.
2. To carry out the investigation into possible cases of sexual harassment, gender harassment and mobbing that are submitted, conducting such written tests and interviews as are



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necessary, and ensuring in all cases the strict confidentiality of the matter and of the people involved, and that fair treatment be accorded to all of these; adopting such interim precautionary measures as are deemed appropriate.

3. To draw up a detailed report containing the proposal for measures to be adopted.
4. To submit this report within two months at the most, although as soon as possible, from reception of the complaint, to ITÍNERE GROUP so that such measures as are deemed pertinent are adopted to solve the problem and, if appropriate, to decide on possible disciplinary action. Copy of this report will also be given to the parties involved.
5. To provide regular updates on each complaint that has been submitted, noting at the end of each report what action has been taken. Committee members will receive specialist training on how to handle harassment in the workplace. In the event of any member of this Committee being involved in a harassment process, or if there is a family, romantic, friendship or enmity link, a close hierarchical superiority or subordination, or any other kind of direct relationship with the presumed victim or presumed perpetrator that might prevail over their objectivity or impartiality in the process, they will automatically be recused from taking part in this particular process. If a committee member is the defendant or the complainant, they are not allowed to take part in any other procedure until their case has been resolved. In any event, and before starting to study the matter, members of the Compliance Unit will have the opportunity to state themselves if there is any reason which precludes their taking part in the investigation, while the remaining members should agree unanimously on who should take their place.
6. For these effects, the following ITÍNERE Group internal regulations will be fully applicable:
 - 6.1 ITÍNERE Group Code of Conduct
 - 6.2 Protocol for using the Whistleblowing hotline.
 - 6.3 Compliance Unit operating regulations.

3.3.4. INVESTIGATION

The Committee can take all steps, within our legal framework, that are needed to clarify the facts including interviews or other investigation techniques, using both internal and external means, with any of those involved, witnesses or third persons whom it believes can provide useful information.

The central aim of the interview is to establish how the affected parties stand and, among other issues:

1. Whether there is, or has been, harassment in the workplace, and if so of what nature, why, what stage is at, and so forth.



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2. The person or persons believed to be perpetrating this harassment and the hierarchical relationship of those involved.
3. The situations in which the harassment occurs. Whether it takes place in presence of other colleagues and, if so, how they have reacted.
4. Whether the case has been reported to a line manager and if so, how (verbally or in writing) and what kind of response was given.
5. The degree to which the victim's health has been affected, including whether they have needed help from a specialist or have been off work in recent months, and on what grounds.
6. Whether other colleagues have or have in the past had similar problems; if so, asking them to provide additional information.

The interviews will in any event be governed by the following rules:

1. In the event of the Committee deciding to hold a joint interview at which both the presumed victim and defendant are present, this interview will only take place with the express permission of both.
2. If either party asks for a meeting or an interview, this will be granted.
3. All the parties involved have the right to legal representation at all times by representatives or advisers; the parties will pay for any expenses and/or fees that these services may accrue.

3.3.5. DRAWING UP THE REPORT

So that the report of the investigation is as comprehensive as possible, the Committee will amass the evidence it considers necessary, that may include: testimonies from the affected parties, people involved, witnesses, etc.; written statements (corporate emails are admissible); reports from specialists attending the affected party (only with the explicit, written authorisation from the party concerned); and any other evidence that contributes useful information to the process. The report will contain, at the minimum, the following information:

1. Background to the case (summary of the arguments given by the parties involved).
2. Summary of the committee's interventions and of evidence obtained.
3. Summary of the main events.
4. Conclusions and proposed measures.

3.3.6. SAFEGUARDING THE HEALTH OF ITÍNERE GROUP MEMBERS

ITÍNERE GROUP will adopt such corrective or preventive measures as it finds helpful in relation to the cases of harassment of which it is cognisant in order to ensure the rights of members of its organization to look after their health.

3.4. OTHER PROVISIONS

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3.4.1. PROTECTING THE VICTIMS If the existence of harassment, in any of its forms, is proven, and if the penalty imposed on the abuser does not involve their dismissal from the organization, nor the reporting of the case to the competent authorities (law enforcement bodies, Public Prosecution Department or the Courts), the necessary measures will be taken to prevent the abuser and the victim sharing the same workplace, provided that this is possible. In applying these measures - which cannot affect their contractual conditions either for better or for the worse - the person whose condition as harassment victim has been proven will have preferential treatment.

3.4.2. FALSE COMPLAINTS ITÍNERE Group maintains a policy of zero tolerance of harassment, but likewise it will not tolerate any abuse of this policy and will therefore be inflexible in its response to complaints that are quite obviously unfounded or those with spurious purposes that are grounded in quarrels, disputes or personal squabbles.

3.4.3. REPRISALS Any working person who makes use of the provisions in this anti-harassment policy will be protected under the terms of the regulations over use of the Whistleblowing hotline.

3.5. DATA PROTECTION The regulations for using INTÍNERE Group's Whistleblowing hotline will apply for these effects. In any event, the unauthorised dissemination of data about any of the procedures initiated will be treated as contractual non-compliance and therefore liable to disciplinary penalty, under the terms laid out in the Group's Code of Conduct.

4) PRINCIPLES

To conclude, the principles that should always prevail in this issue have been summarised below in order to highlight the most important points in the Protocol:

1. ITÍNERE GROUP will not tolerate any kind of workplace harassment.
2. All members of and people working in the companies making up the ITÍNERE GROUP have the responsibility to cooperate in ensuring a workplace environment that is free of any kind of harassment.
3. In the event of a complaint, appropriately discreet action will be taken to preserve the dignity and privacy of all parties involved.
4. Complaints and claims will be made in writing, may not be anonymous and will be investigated and analysed with all due speed, in an expeditious and credible manner.
5. All affected parties will be listened to and supported at all times.
6. All parties involved will receive even-handed treatment; the defendant will not be presumed guilty.



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7. Complaints will be founded on information that constitutes reliable, detailed evidence.
8. False accusations and reprisals resulting from personal quarrels will not be tolerated and may be the object of disciplinary measures, in line with labour legislation regulations. People's safety and health will be safeguarded above all else, so that such measures as are considered opportune in each case can be taken.