



POLICY FOR PREVENTING AND COMBATING HARASSMENT IN THE WORKPLACE

The management believes that all employees should be treated with respect and dignity and that bullying, in all its manifestations at the workplace, is unacceptable and will not be tolerated under any circumstances.

This policy sets out the basis for creating a safe and respectful working environment where all employees feel protected from harassment and where a culture of mutual respect is fostered.

1. Definition of Harassment at Work:

- We clearly state the definition of workplace bullying, including any unwanted, offensive, intimidating or humiliating behaviour that takes place in the workplace.
- Psychological harassment can be defined as a situation in which a person or group of persons engage in
 psychologically violent behaviour towards another person or group of persons systematically and over a
 prolonged period of time in the workplace, and with the aim of eliminating the harassed persons from the
 organisation and destroying their capacity. It includes behaviour that frightens, offends, denigrates or
 humiliates the worker in order to isolate him or her from the group.
- Sexual harassment can be defined as "any verbal or physical behaviour of a sexual nature that has the purpose or effect of violating the dignity of a particular person when it creates an intimidating, degrading or offensive environment".

2. Zero Tolerance:

• We maintain a zero tolerance policy towards workplace harassment in all its forms, regardless of the hierarchical position of the person involved.

3. Whistleblowing Channels:

• We ensure confidentiality and availability of reporting channels, enabling staff to report any incidents of harassment in a safe and secure manner.

4. Timely and Fair Investigation:

• We commit to conduct thorough, impartial and timely investigations into any allegations of workplace harassment. Confidentiality will be maintain to the extent possible during the investigation process.

5. Prohibition of Retaliation:

• We guarantee that staff who report acts of harassment will not be subject to retaliation. Any retaliation will be treated with the same seriousness as the harassment itself.

6. Awareness Raising and Training:

• awareness raising and training for all employees, highlighting the importance of a respectful and harassment-free working environment.

7. Senior Management Accountability:

• Senior management takes responsibility to lead by example and to promote an inclusive and respectful work environment.

8. Disciplinary Measures:

• We state that anyone found guilty of workplace harassment will be subject to disciplinary action, which can range from warnings to termination of employment, depending on the severity of the incident.

9. Victim Support:

• We provide support to victims of harassment, including access to counselling services and legal assistance if necessary.

10. Review and Continuous Improvement:

• We periodically review and update our policy on preventing and combating workplace harassment to ensure that it remains effective and adapts to the changing needs of the work environment.

Approved by:

Margarita Roca - Director 4 de Diciembre de 2023 PCA 12.2023 - V2