

**PROTOCOL FOR THE PREVENTION OF
AND ACTION AGAINST SEXUAL AND
GENDER-BASED HARASSMENT IN THE
WORKPLACE
BAVIERA GROUP**

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1.- COMMITMENT

With this protocol, the Baviera Group once again demonstrates its zero tolerance towards the occurrence of conduct constituting sexual harassment or harassment based on gender throughout its organisation. This protocol develops in depth concepts that were previously regulated in the Baviera Group through the Internal Labour Code, approved by the Board of Directors of Clínica Baviera, S.A. on 21 July 2016. Therefore, this protocol shall apply in the cases defined therein, with the Internal Labour Code previously in force being applicable for all other matters.

By adopting this protocol, Grupo Baviera wishes to underline its commitment to the prevention of and action against sexual harassment and harassment on grounds of sex in any of its manifestations, informing of its application to all personnel who provide services in its organisation, whether they are its own personnel or from other companies, including persons who, not having an employment relationship, provide services or collaborate with the organisation, such as trainees, those who carry out non-labour practices or those who volunteer.

The Bavaria Group also undertakes to inform the companies to which its own personnel are seconded and the companies from which the personnel working within the Group originate of the existence of this protocol, indicating the need for strict compliance with the protocol, of the existence of this protocol.

Thus, the obligation to comply with the provisions of this protocol shall be included in the contracts concluded with other companies.

Where the alleged harasser is outside the Group's power of management, and therefore unable to implement the procedure in its entirety, the competent company shall be approached to take appropriate action and, if necessary, to sanction the person responsible.

2.- DEFINITION AND TYPES OF SEXUAL AND GENDER-BASED HARASSMENT

SEXUAL HARASSMENT

Without prejudice to the provisions of the Penal Code, for the purposes of this protocol, any verbal or physical behaviour of a sexual nature which 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, constitutes sexual harassment. Sexual harassment shall be deemed to be discriminatory. The conditioning of a right or an expectation of a right on the acceptance of a situation constituting sexual harassment shall also be deemed to constitute discrimination on grounds of sex.

In accordance with article 38 of Organic Law 10/2022 of 6 September on the comprehensive guarantee of sexual freedom, **sexual harassment** is a form of sexual violence, since acts of a sexual nature that are not consensual or that condition the free development of sexual life in any public or private sphere, including the digital sphere, are considered to constitute sexual violence.

Sexual violence includes sexual aggression, **sexual harassment**, exploitation of the prostitution of others, as well as all the crimes foreseen in Title VIII of Book II of Organic Law 10/1995, of 23 November, of the Penal Code. Consequently, the victims must be guaranteed all the labour and social security rights stipulated in the law.

EXAMPLES OF SEXUAL HARASSMENT:

1.- Verbal behaviour:

- Allegations of sexual advances, propositions or pressure for sexual activity;
- Offensive flirtations;
- Insinuating comments, hints or obscene remarks;
- Unwanted phone calls or social media contacts.
- Jokes or comments about sexual appearance.

2.- Non-verbal behaviour:

- Display of sexually suggestive or pornographic pictures, objects or writings, lewd looks, gestures.
- Letters or messages in e-mails or on social networks of an offensive nature and with a clear sexual content.

3.- Physical Behaviour:

- Deliberate and unsolicited physical contact, unwanted hugs or kisses, excessive and unnecessary physical contact.

SEVERITY LEVELS

Scale of severity	Description of action
SLIGHT	Corresponds to public verbal expressions that are degrading to the person being harassed (jokes with sexual content, sexual compliments/comments about the workers, repeatedly asking for appointments, excessive approaches together with non-consensual approaches).
GRAVE	It is associated with situations in which there is non-consensual direct verbal interaction with a high sexual content (questions about sexual life, sexual innuendo, openly asking for sex, or pressure after a break-up with a partner) and physical contact not allowed by the person being harassed.
VERY SERIOUS	Corresponds to situations involving unwanted physical contact and direct verbal pressure, such as unwanted hugs and kisses, touching, pinching, cornering, pressure for sex in exchange for improvements. or threats, sexual acts under pressure of dismissal, sexual assault, etc.

Severity scale	Typology	Description of the action
SLIGHT	VERBAL	<ul style="list-style-type: none">• Saying compliments.• Spreading rumours about a person's sex life.• Talking about one's sexual skills/abilities.• Making offensive sexual jokes and pranks.• Making rude comments about the body or physical appearance.• Make sexual comments.• Repeated requests for appointments after a refusal.
	NON VERBAL	<ul style="list-style-type: none">• Making lewd gestures.

	PHYSICAL	<ul style="list-style-type: none"> Conduct approaches non-consensual approaches.
GRAVE	VERBAL	<ul style="list-style-type: none"> Ask about or explain fantasies, sexual preferences. Ask about sex life. Pressure after a break-up
	NON VERBAL	<ul style="list-style-type: none"> Making obscene gestures
	PHYSICAL	<ul style="list-style-type: none"> Cornering, deliberately seeking to be alone with the person unnecessarily. To provoke the apparently "accidental" physical contact of bodies.
VERY SERIOUS	VERBAL	<ul style="list-style-type: none"> Demanding sexual favours. Making direct insinuations. Send letters, notes or e-mail e-mail messages of offensive sexual content. Disseminating images or videos of sexual content to other staff, either through social media or through the media. social media, communication applications or other media.
	NON VERBAL	<ul style="list-style-type: none"> Going to the extent of physical force to show the superiority of one sex over the other.
	PHYSICAL	Executing deliberate physical contact and unsolicited (pinching, touching, unwanted massages).

HARASSMENT ON GROUNDS OF SEX

Harassment on grounds of sex is any conduct carried out on the basis of a person's sex with the purpose or effect of violating the dignity of that person and of creating an intimidating, degrading or offensive environment.

All harassment on grounds of sex shall be considered discriminatory. In order to assess that a situation that can be classified as harassment on grounds of sex actually exists in a specific situation, a series of elements that form a common denominator must be present, among which the following stand out:

- a) Harassment, understood as any intimidating, degrading, humiliating and offensive conduct that originates externally and is perceived as such by the person who suffers it.

- b) Objective attack on the victim's dignity and subjectively perceived by the victim as such.
- c) Pluriofensive result. The attack on the dignity of the person who suffers harassment on the grounds of sex 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 the psychological and physical health, etc.
- d) It is not an isolated event. It is carried out repeatedly
- e) The reason for these behaviours must have to do with the fact that they are women or because of circumstances that biologically can only affect them (pregnancy, maternity, breastfeeding); or that have to do with reproductive and care functions that, as a result of social discrimination, are presumed to be inherent to them.

In this sense, harassment on grounds of sex can also be suffered by men when they carry out functions, tasks or activities related to the role historically attributed to women, for example, a male worker who is harassed for caring for children or dependants. The conditioning of a right or an expectation of a right on the acceptance of a situation constituting harassment on grounds of sex shall also be deemed to constitute discrimination on grounds of sex.

EXAMPLES OF HARASSMENT BASED ON SEX

1.- Attacks with organisational measures

- Judging the person's performance in an offensive way, hiding their efforts and abilities.
- Questioning and overruling the person's decisions.
- Not assigning any homework, or assigning meaningless or demeaning homework.
- Denying or concealing the means to carry out the work or providing incorrect information.
- Assigning work that is much higher or much lower than the person's skills or qualifications, or that requires much lower qualifications than those possessed.
- Contradictory or impossible to comply with orders.
- Theft of belongings, documents, work tools, deleting files from the computer, tampering with work tools causing damage, etc. 8.
- Threats or pressure on people who support the harassed person.
- Manipulation, concealment, return of correspondence, calls, messages, etc., from the person.
- Denial or difficulties in accessing permits, courses, activities, etc.

2.- Actions intended to isolate the target group

- Change the location of the person by separating him/her from his/her peers (isolation).
- Ignore the presence of the person.
- Do not address the person.
- Restrict colleagues from talking to the person.
- Not allowing the person to express him/herself.
- Avoid all eye contact.
- Remove or restrict the means of communication available to the person (telephone, email, etc.).

Activities affecting the physical or psychological health of the victim

- Threats and physical aggression.
- Verbal or written threats.
- Shouting and/or insults.
- Frightening phone calls.
- Provoking the person, forcing them to react emotionally.
- Intentionally incurring expenses to the detriment of the person.
- Damage to the workplace or your belongings.
- Requiring the person to perform work that is dangerous or harmful to his or her health.

4.- Attacks on privacy and personal or professional reputation

- Manipulating personal or professional reputation through rumour, denigration and ridicule.
- Imply that the person has psychological problems, try to get the person to undergo a psychiatric examination or diagnosis.

SEVERITY LEVELS

Scale of

severity

Scale of severity	Typology	Description of the action
SLIGHT	VERBAL	<ul style="list-style-type: none"> Assigning meaningless or unachievable tasks (unreasonable deadlines) to a person on the basis of their gender. Assigning a person to a place of work of a lower level of responsibility than his or her professional capacity or category, solely because of his or her sex. Ignore contributions, comments (exclude, do not take seriously). Use sexist humour. Ridiculing, belittling, belittling people's abilities, skills and intellectual potential on the basis of their sex. Ridiculing people who take on tasks traditionally undertaken by the other sex (e.g. nurses or welders).
	NON VERBAL	<ul style="list-style-type: none"> Use gestures that produce an intimidating atmosphere.
		<ul style="list-style-type: none">
GRAVE	VERBAL	<ul style="list-style-type: none"> Denying permits to which a person is entitled, arbitrarily and on the basis of his or her gender
	NON VERBAL	<ul style="list-style-type: none"> Engaging in discriminatory conduct on the grounds of being a woman or a man
	PHYSICAL	<ul style="list-style-type: none"> Cornering, deliberately seeking to stand in isolation from the person unnecessarily in order to intimidate. Excessive physical approach. Sending messages with a threatening tone.
VERY SERIOUS	VERBAL	<ul style="list-style-type: none"> Disparaging the work done by people of a particular sex. Using demeaning forms of address to persons of a particular sex.
	NON VERBAL	<ul style="list-style-type: none"> Sabotage the work or - deliberately - prevent access to the appropriate means to carry out the work (information, documents, equipment). Publish or disseminate messages or audiovisual content (images, memes, audios, etc.) that are intended to denigrate a person or to create an environment humiliating for the worker.
	PHYSICAL	Going to the extent of physical force to show the superiority of one sex over the other.

3.- ACTIONS TO PREVENT AND RESPOND TO SITUATIONS OF SEXUAL OR GENDER-BASED HARASSMENT

1. Preventive measures, including a statement of principles, definition of sexual harassment and gender-based harassment and identification of conduct that could constitute these types of harassment.

- ✓ Promote an environment of respect and correctness in the work environment, conveying values of equal treatment, respect, dignity and free development of the individual's personality.
- ✓ Make the entire workforce aware of the content of this protocol and the procedure established to resolve situations of sexual harassment or sexual harassment on grounds of sex.
- ✓ Conduct specific training on sexual harassment and gender-based harassment.
- ✓ Assess psychosocial risks in order to identify the groups most susceptible to harassment.
- ✓ Disseminate the existence of this protocol in the induction manuals for new staff.

2. Proactive or procedural measures to deal with harassment in order to deal with complaints or reports that may arise and applicable precautionary and/or corrective measures.

3. Identification of reactive measures against bullying and, where appropriate, the disciplinary regime.

4. Design and implementation of measures for the prevention of and action in situations of sexual harassment or harassment for reasons of sex that may occur by users both in the exercise of their work duties and in the relationships arising from these.

4. PRINCIPLES OF ACTION AND GUARANTEES

- **Liability.** Group companies will punish both those who engage in offensive conduct and those who promote, encourage and/or tolerate it. All company personnel are obliged to respect the fundamental rights of all those who make up The Group, as well as those of the people who provide services to it. In particular, they shall refrain from behaviour that is contrary to dignity, privacy and the principle of equality and non-discrimination, always promoting respectful conduct.
- **Collaboration.** Any person who becomes aware of possible situations of sexual or gender-based harassment must report it through the internal channel established in the Group's Internal Information System in accordance with the provisions of Law 2/2023, of 20 February, regulating the protection of persons who report breaches of regulations and the fight against corruption. Likewise, whoever is responsible for the centre must pay attention and process the communication of the facts so that the bodies in charge of developing the intervention procedure may intervene.
- **Confidentiality.** The identity of each and every person involved in the procedure and the information arising from it shall be kept confidential. Those involved are obliged to maintain strict confidentiality and not to pass on or divulge information about the content of cases under investigation, even after they have been completed.
- **Respect and protection of dignity and integrity.** The proceedings shall be conducted with the utmost respect for the persons involved, who may be assisted by legal or trade union representatives or any other person of their choice throughout the process.
- **Diligence and speed.** The investigation and resolution of the reported conduct must be carried out with due professionalism, diligence and without undue delay, so that the procedure can be completed in the shortest possible time, respecting due diligence.
- **Hearing, impartiality and contradiction.** The procedure must guarantee the hearing and the impartial and fair treatment of all persons involved. Those involved in the procedure shall act in good faith in the search for the truth and for the clarification of the alleged facts.

- **Protection from retaliation.** All necessary measures must be taken to ensure that there is no retaliation against persons making a report, appearing as witnesses or participating in an investigation into conduct such as that described in this protocol, in accordance with the provisions of (i) Law 2/2023 of 20 February on the protection of persons who report breaches of regulations and the fight against corruption and (ii) the Bavaria Group's Internal Reporting System Policy.
- **Restitution of victims.** If the harassment has resulted in a deterioration of the victim's working conditions, the victim must be reinstated on the same terms and conditions, if the victim so requests.
- **Health protection.** All necessary measures shall be taken to protect the health (biopsychosocial) of the persons concerned.

5.- AREAS OF APPLICATION OF THE PROTOCOL

The protocol shall apply to situations of sexual harassment or harassment based on sex that occur at work, in connection with work or as a result of work:

- a) In the workplace, including in public and private spaces when they are a workplace;
- b) In rest areas, or in sanitary or washing facilities and changing rooms;
- c) During work-related travel, trips, social or training events or activities;
- d) In the context of work-related communications, including through information and communication technologies (virtual harassment or cyber-bullying);
- e) In accommodation provided by the company.
- f) in places where the worker is performing a service or action of his or her job;
- g) for journeys between home and place of work, provided that they involve people in the working environment

This protocol complies with the requirements of articles 46.2 and 48 of Organic Law 3/2007, of 22 March, for the effective equality of women and men, RD 901/2020 of 13 October, which regulates equality plans and their registration and modifies Royal Decree 713/2010, of 28 May, on the registration and deposit of collective bargaining agreements and collective labour agreements and article 14 of Law 31/1995, of 8 November, on the prevention of occupational hazards.

By committing ourselves to the measures that make up this protocol, we express and publicise once again the Baviera Group's willingness to adopt a proactive attitude both in the prevention of harassment - raising awareness and providing information on behaviour that is not tolerated by the company - and in the dissemination of good practices and the implementation of any measures necessary to manage any complaints that may arise in this regard, as well as to resolve them as appropriate in each case.

6.- CONSTITUTION AND FUNCTIONS OF THE ACTION COMMITTEE FOR THE PROTOCOL IN CASES OF SEXUAL HARASSMENT OR HARASSMENT ON GROUNDS OF SEX

An investigating and monitoring committee for cases of sexual harassment and harassment on grounds of sex is set up, made up of four people: two people from the RLPT or from the most representative trade unions in the sector and two people from the management. The Plan committee will appoint people from the company and from the legal representatives of the workers. In the event that it is considered appropriate, a replacement person will be appointed by the company and another by the workers' legal representatives.

One of the persons appointed by the management shall assume the chairmanship of the committee.

In the event that there are not at least two RLPTs at the time of the constitution of the committee, it can be formed by the person from the RLPT (if it exists) and one person from the company.

In order to ensure the utmost confidentiality of this procedure, the persons serving on this committee shall be fixed for each procedure.

The commission shall have a four-year term of office.

The aforementioned persons who make up this investigating committee shall comply with the impartiality with respect to the affected parties in an exhaustive manner, so that in the event of any kind of kinship by blood or affinity with any of the persons affected by the investigation, intimate friendship, manifest enmity with the persons affected by the procedure or direct or indirect interest in the specific process, they shall abstain from acting.

In the event that, despite the existence of these causes, abstention does not occur, any member of the committee or any of the persons affected by the procedure may request the disqualification of said person or persons from the committee. In addition, this committee may request, subject to majority agreement, the hiring of an external expert who may accompany them in the investigation of the procedure.

This committee shall meet no later than 7 working days from the date of receipt of a complaint, allegation or knowledge of inappropriate behaviour, in accordance with the procedure set out in this protocol for its presentation.

The committee shall immediately and thoroughly investigate any report, communication, complaint or report of behaviour that could be considered sexual or gender-based harassment.

All persons involved in the process are under an obligation of strict confidentiality, secrecy and professional secrecy with regard to all the information and information provided to them.

information to which they have access. Complaints, allegations and investigations shall be treated in strict confidence, consistent with the need to investigate and take corrective action, bearing in mind that it may directly affect the privacy and reputé of individuals.

The documentation shall be kept in the custody of persons designated by the company or organisation.

Interviews will always take place in person. Committee meetings can be face-to-face or online.

All decisions on actions, precautionary measures, final report and sanctions if any, or any other decision arising from the application of the protocol, must be the result of the work of the sexual or gender-based harassment protocol action committee. Within the harassment investigating committee, decisions shall be taken by consensus, whenever possible, and failing this, by majority vote.

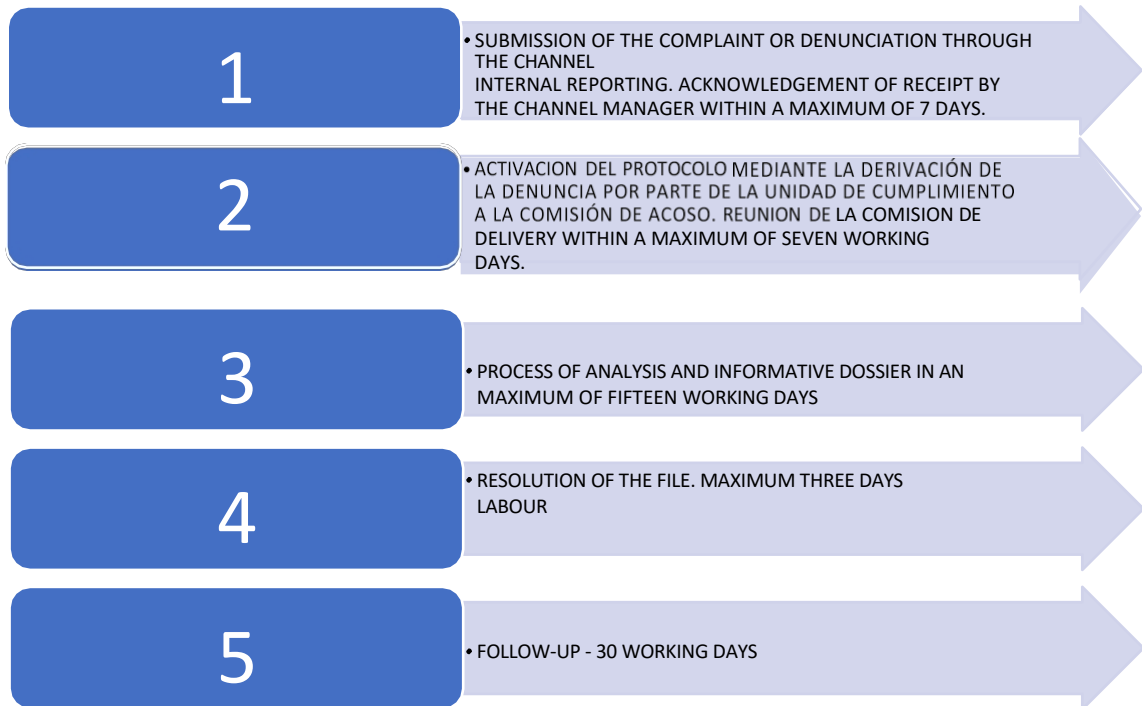
In the event that it is not possible to form a majority, the chairman shall have a casting vote. The committee's decision shall then include the content of the minority's dissent and the reasons why it was not possible to reach a majority decision.

Expenses arising from the commission's activities, such as per diems, travel and hotel expenses, shall be borne and managed by the Group.

Time spent by the RLPT or persons involved in the process counts as working time.

The actions of this committee shall in no case conflict with those of the Compliance Unit, which shall carry out the actions corresponding to it in accordance with the provisions of (i) the Compliance Policy and (ii) the Bavaria Group's Internal Information System Policy.

7.- PROCEDURE FOR DEALING WITH A SITUATION OF SEXUAL OR GENDER-BASED HARASSMENT



7.1.- PRESENTATION OF THE COMPLAINT OR DENUNCIATION

- Complaints must be submitted through the Internal Reporting Channel, of which all employees have been expressly informed. The person in charge of the Channel must acknowledge receipt of the complaint received within a maximum period of 7 days in accordance with the Internal Communication System Management Procedure.
- Complaints may be made in identified or anonymous form and may be made by the person who feels harassed or whoever has knowledge of this situation, although only complaints made in identified form will be investigated in accordance with the provisions of this protocol. Anonymous complaints will be investigated in accordance with the provisions of the Group's Internal Information System in accordance with the provisions of Law 2/2023, of 20 February, regulating the protection of persons who report breaches of regulations and the fight against corruption.

- Only the person responsible for receiving complaints, the Compliance Unit and the Harassment Committee shall have access to the content of the complaint.
- Once it has been received, the procedure for its processing will be activated within a maximum of 7 working days.

7.2.- ACTIVATION OF THE HARASSMENT PROTOCOL WITH THE MEETING OF THE INSTRUCTING COMMITTEE WITHIN A MAXIMUM OF THREE WORKING DAYS

The information on the complaint shall be sent to all the people who form part of the committee to carry out a preliminary study to determine whether there is an indication of sexual harassment or harassment on grounds of sex. In the event that the protocol is not activated or when the procedure cannot be resolved even though it has been activated, the informative file will be started.

7.3.- ANALYSIS PROCESS AND INFORMATION DOSSIER WITHIN A MAXIMUM OF TEN WORKING DAYS

- The commission shall conduct a prompt and confidential investigation within 10 working days, during which it shall hear the persons concerned and any witnesses proposed and shall request all necessary documentation, without prejudice to the provisions on the protection of personal data and confidential documents. The persons requested to do so shall cooperate as diligently as possible.
- In the course of the proceedings, the person concerned shall first be heard and then the person against whom the complaint has been lodged.
- Both parties may be assisted and/or accompanied by a person of their trust, whether or not they are legal and/or trade union representatives of the workers, who shall keep confidential the information to which they have access.
- The procedure should be as swift and efficient as possible and should in all cases protect the privacy, confidentiality and dignity of the persons concerned, as well as the right of contradiction of the person against whom the complaint is lodged.
- Throughout the entire procedure, strict confidentiality shall be maintained and all internal investigations shall be carried out with tact and due respect both for the person complained of, whose guilt shall not be presumed, and for the person concerned, who shall in no case be treated unfavourably for this reason, and for the individual.
- All persons involved in the process shall be under an obligation of confidentiality and secrecy with regard to all information to which they have access.
- During the processing of the case, at the proposal of the investigating committee, the company management shall adopt the necessary precautionary measures leading to the immediate cessation of the situation of harassment, without such measures entailing permanent and definitive damage to the working conditions of the persons involved.

7.4.- RESOLUTION OF THE FILE. MAXIMUM THREE WORKING DAYS

At the end of the investigation, the committee shall draw up a record of the facts,

and the evidence produced, concluding whether or not, in his or her opinion, there is evidence of sexual harassment or harassment on grounds of sex.

None of the proceedings shall prevent the persons involved from requesting any judicial, administrative or any other type of proceedings that may be appropriate.

Once the management has received the findings of the investigating committee, it shall take the decisions it deems appropriate within 3 working days, and it alone shall be empowered to decide on the matter.

A/ If there is no evidence of harassment, the committee shall state in the minutes that there is no evidence of sexual harassment or harassment on grounds of sex.

B/ If, from the evidence gathered, it is deduced that there is evidence of harassment, in the conclusions of the report, the investigating committee shall urge the organisation to adopt the appropriate sanctioning measures, and may even, in the case of very serious harassment, propose the disciplinary dismissal of the harasser.

C/ If, even if there is no harassment, an inappropriate action or a situation of violence susceptible of being sanctioned is found, the harassment investigating committee shall also urge the management to take the measures deemed appropriate in this respect.

The conclusions of the committee shall be communicated in writing to the victim, to the person reported and to the investigating committee, who shall maintain confidentiality regarding the information to which they have access. The conclusions shall also be communicated in writing to the Compliance Unit and, therefore, to the person responsible for the internal information channel so that this, in turn, may comply with its obligations to communicate the conclusions and resolution of the procedure in accordance with the provisions of the Internal Communication System Management Procedure.

Likewise, the decision finally adopted in the case will also be communicated to the equality plan monitoring committee and to the person responsible for occupational risk prevention. In these communications, in order to guarantee confidentiality, no personal data shall be given and the numerical codes assigned to each of the parties involved in the case shall be used, where appropriate.

PUNITIVE MEASURES

If appropriate, and depending on the results of the investigation, the person involved will be sanctioned by applying the table of offences and sanctions provided for in the collective agreement applicable to the company or, if applicable, in Article 54 of the E.T. (Labour Code).

In the event that the sanction against the person involved is not the termination of the contractual relationship, the management will maintain an active duty of vigilance towards the worker when he/she returns to work (in the case of a suspension), or in his/her new position in the case of a change of location. But always and in any case, compliance with eradicating harassment will not end with the mere adoption of the measure of the change of position or with the mere suspension, and subsequent monitoring and control by the company will be necessary.

RIGHTS OF VICTIMS OF SEXUAL VIOLENCE (INCLUDING SEXUAL HARASSMENT)

- To the reorganisation of their working time or reduction of working hours with a proportional reduction in pay or to the reorganisation of working time, through the adaptation of working time, the application of flexitime or other forms of working time arrangements in use in the company.

These rights may be exercised in the terms established for these specific cases in the collective agreements or in the agreements between the company and the workers' representatives or in accordance with the agreement between the company and the worker concerned. Disputes arising between employer and employee shall be resolved by the competent jurisdiction through the procedure established in article 138 bis of the Labour Procedure Act.

- The right to perform their work wholly or partly at a distance or to cease to do so if this is the established system, provided in both cases that this type of work is carried out at a distance, or to cease to do so if this is the established system.

The provision of services is compatible with the position and functions performed by the person.

- Absence or absence from work due to the physical or psychological situation resulting from your status as a victim of sexual violence will be considered as justified and shall be remunerated when so determined by the social care or health services.

- The right **to** geographical mobility, to a change of workplace, to the adaptation of their workplace and to the support they need because of their disability.

to their reinstatement, to the suspension of the employment relationship with job reservation and to the termination of the employment contract. The victim's right to continue in his or her job will always prevail, which is why the sanctions may include the transfer of the person who has harassed the employee to another centre. As a sanctioning measure, the person allegedly involved must be physically separated from the person affected, by means of a change of position and/or shift or timetable, and in no case shall the person affected by harassment be forced to change position, timetable or location within the company.

In such cases, the Group shall be obliged to inform employees of any vacancies existing at that time or which may arise in the future.

The transfer or change of work centre will initially last between six and twelve months, during which time the company will be obliged to reserve the position previously occupied by the workers. At the end of this period, workers may choose between returning to their previous job, continuing in the new job, in which case the obligation to reserve the job, or terminating their contract, receiving compensation of 20 days' salary per year of service, with periods of less than one year being prorated by months and with a maximum of 12 monthly payments.

- The initial period of suspension shall not exceed six months, unless it is apparent from the court proceedings that the effectiveness of the the victim's right to protection requires the continuation of the suspension. In this case, the judge may extend the suspension for periods of three months, up to a maximum of eighteen months.

7.5.- FOLLOW-UP

Once the file has been closed, and within a period of no more than thirty calendar days, the commission is obliged to follow up on the agreements adopted, i.e. on their compliance and/or the result of the measures adopted.

The result of this monitoring will be the subject of a report containing the proposed measures to be adopted in the event that the events causing the procedure continue to occur, and an analysis will also be made of whether the proposed preventive and punitive measures have been implemented, where appropriate.

This report shall be forwarded to the management in order for it to take the necessary measures, as well as to the company's committee and to the person responsible for occupational risk prevention, with the precautions indicated in the procedure regarding the confidentiality of the personal data of the parties concerned.

8.- COMPLIANCE AND ENTRY INTO FORCE

The contents of this protocol must be complied with, coming into force upon its approval and remaining in force for four years. However, it will be necessary to carry out a review and adaptation of the protocol in the following cases:

- At any time during its term in order to reorient the fulfilment of its objectives of prevention and action against sexual harassment and harassment based on sex
- When their lack of compliance with legal and regulatory requirements or their inadequacy is revealed as a result of action by the Labour and Social Security Inspectorate.
- In the event of merger, takeover, transfer or modification of the legal status of the company and in the event of any incident that substantially modifies the company's workforce, its working methods, organisation.
- When a court decision condemns the company for discrimination based on sex or sexual orientation or determines that the protocol does not comply with legal or regulatory requirements.

***This procedure does not prevent or limit the right of individuals to complain, at any time, to the Labour and Social Security Inspectorate, as well as to the civil, labour or criminal courts.

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Fernando José Carrero Bosch

VIDsigner code: 638E54B80DA04D088...

Nuria Rama

VIDsigner code: 09D750C2B02C4F66A...

Rosario García Ramos

VIDsigner code: 019CC9ACB81B4072A8...

Silvia Espinosa López