



# Protocol for Prevention and Action in Cases of Discriminatory Harassment or Violence, against Freedom, Equality or Moral Integrity, and especially vulnerable groups (LGTBI)

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## Index

1. Introduction
2. Declaration of Principles
  - Chapter I. Purpose and scope of application
    - A) Object
    - B) Scope of application
    - C) Preventive actions
  - Chapter II. General concepts
    - A) Definitions
    - B) Preventive measures
    - C) Principles of action
    - D) Competition
  - Chapter III. Action procedure of the Committee for the prevention of harassment
    - A) Start procedure
    - B) Preliminary Phase
    - C) Research
    - D) Conclusion
    - E) Adoption of measures
3. Validity
- Annex I. Reference regulations



## 1. Introduction

In accordance with the principles, policies and commitments of Cox Group (Social Labor Responsibility Policy, Code of Conduct, Equality Framework Plan, among others, and in line with applicable national and international regulations) (1), this Protocol is established for the prevention and action in cases of harassment and discrimination of any nature, including special protection groups, (hereinafter the Protocol ), in order to attend to and instruct any situation that may be classified as such, offering its employees all the necessary guarantees.

As a declaration of principles contemplated in its policies, Cox Group expressly rejects all forms of discrimination, direct or indirect, based on sex, gender or identity and actively promotes the promotion of equal treatment and opportunities for all.

Guaranteeing real and effective equality between women and men, trans people and the rights of LGTBI people are at the base of this Protocol, which protects all employees against any type of discrimination and against any type of moral harassment. , sexual, or based on sex, gender or identity.

In accordance with the company's commitment, all personnel must be treated with dignity, without allowing or tolerating any type of harassing behavior or any discriminatory act based on origin, race, color, religion, age, disability. , marital status, sexual orientation or any other characteristic. In this same sense, any use of information that is contrary to the right to privacy and intimacy or that involves an action that aims to disrespect, degrade or humiliate its employees, including digital media, is strictly prohibited.

The Company expresses its deep rejection of any discriminatory behavior, particularly towards those of a sexual nature or connotation, committing to work effectively to prevent, detect, correct and sanction this type of behavior. Likewise, it is understood that discrimination in general, and sexual harassment in



particular, seriously damages the following rights: right to privacy; right to dignity; right to sexual freedom; right to equality and non-discrimination; right to health and safety and right to employment.

*<sup>1</sup> Organic Law 3/2007, of March 22, for effective equality between women and men; Royal Decree 901/2020, of October 13, which regulates equality plans and their registration; Organic Law 10/2022, of September 6, on the comprehensive guarantee of sexual freedom and Law 4/2023, of February 28, for the real and effective equality of trans people and to guarantee the rights of LGTBI people . Look at annex 1.*

All employees have the right to be treated with dignity and respect and to work in a professional environment that promotes equal employment opportunities and prohibits all discriminatory practices, including harassment.

Cox Group , in accordance with its policy of zero tolerance towards any manifestation of violence, harassment, verbal abuse, abuse of authority at work, discrimination or any other conduct that generates an intimidating or offensive environment, declares that the relationships between people in the Work environments must be characterized by being free of bias, prejudice and harassment. Therefore, the Company is committed to creating, maintaining and protecting with all possible measures at its disposal, a work environment where the dignity and freedom of all the people who work in it are respected.

Consequently, and in compliance with the above, the Company has a protocol for the prevention and action in cases of harassment and discriminatory acts, its reporting, investigation and resolution, through the corresponding single channel, in accordance with the following statement of principles: the Company expresses its firmest commitment to the principles of non-discrimination and equal opportunities in the development of the professional careers of its staff. In this sense, the Company is committed to promoting a work environment free of all discrimination and any conduct that may imply harassing behaviour.

All people employed in the group are responsible for guaranteeing a work environment in which the dignity and equal treatment of all people are



respected, although personnel with responsibility due to their position will be especially entrusted with the task of guaranteeing and prevent harassment situations of any kind from occurring within its scope.

All persons included in the scope of application of this Protocol have the right to make use of the procedure included in it with guarantees of not being subjected to intimidation or unfair, discriminatory or unfavourable treatment, even anonymously.

The action procedures described in this Protocol will be governed by the principles of confidentiality, credibility and speed, and guarantee and protect both the privacy and dignity of the people subject to harassment, as well as the rights of the people reported.

Any employee who knows of the existence of an alleged case of harassment or a discriminatory act must report it, as soon as possible, by the means contemplated in this Protocol. Both the tolerance of harassing behaviour and its concealment can have disciplinary effects in accordance with current regulations.

## **2. Principles**

### **Chapter I. Purpose and scope of application**

#### *A) Object*

This Protocol aims to prevent and avoid cases of harassment or discriminatory acts in the work environment and, if they occur, ensure that the appropriate procedure is available to resolve them and prevent their repetition. These measures are intended to guarantee harassment-free work environments in the Company's workplaces, in which all people are obliged to respect integrity and dignity in the professional and personal spheres.



### *B) Scope of application*

This Protocol is applicable to all people who work in any company in the Company's group (according to the perimeter defined at the end of this document) in which direct or indirect management control is exercised. The same criterion applies to those UTEs, consortia, Joint Ventures, SPVs and other associative entities in which any company in the Company's group participates. Its geographical scope is worldwide, without prejudice to possible modifications or adaptations that may be required by the regulations of the corresponding country. It is part of the Common Management System.

### *C) Preventive actions*

With the intention of preventing harassment situations of all types, measures will be promoted to prevent them from occurring, based on the principle that all people have the right to respect for their privacy, due consideration of their dignity and non-discrimination in labor relations, including:

- **Communication** : promoting knowledge of this Protocol by all employees, using all media for its dissemination (Intranet, corporate website, profiles on social networks...), disseminating in particular information regarding the procedure to follow for reporting a possible situation of harassment, raising awareness of the concepts of respect for dignity on which it is inspired and informing companies that provide services to the Company of its existence.
- **Training** : with the intention of preventing harassment situations and from the perspective of risk prevention, training plans will especially include this subject.
- **Commitment** : All employees have a responsibility to help ensure a work environment where dignity is respected. It is also an essential obligation of any manager or manager to ensure the achievement of an adequate work environment free of conduct that could constitute harassment, according to the terms contained in this Protocol. For this reason, those responsible must be entrusted with the task of guaranteeing and preventing harassment situations from occurring within their scope, taking the measures they consider necessary to avoid conduct that may constitute harassment.



These actions will include, in turn:

- Contribute to preventing workplace, sexual and gender-based harassment at work by developing a Prevention Protocol for workplace, sexual and gender-based harassment.
- Preparation and dissemination, among the staff, of an informative document in the field of harassment prevention.
- Integrate the information document into the Reception Plan / Welcome Manual.
- Carry out periodic monitoring of complaints received
- Train the members of the management bodies both in matters of harassment and in the procedures included in this Protocol.
- Include in the Code of Conduct the contents related to workplace, sexual and gender-based harassment and provide training in this regard to identify these situations and know how to act in each case.

## Chapter II. General concepts

### *A) Definitions*

**Moral Harassment:** Moral harassment is considered any act, conduct, practice or behavior that, carried out on a person in the workplace, directly or indirectly involves a detriment or attack on their dignity, which may harm their integrity through the degradation of their the working conditions and the creation of an intimidating, offensive or hostile environment, whatever the reason that leads to the performance of that conduct and whether carried out by co-workers, superiors or people subject to their dependence.

**Workplace harassment or mobbing :** any conduct or practice that, within the scope of the employment relationship, and systematically and recurrently over time, entails an impairment or attack on the dignity of the employee, with the aim of emotionally and psychologically subjugating him or her. , negatively affecting the work environment; and in such a way that their capacities for professional promotion or permanence in the job are nullified or diminished. This occurs if, continuously and repeatedly over time, behaviours such as the exclusion of the employee from relationships with his colleagues, the lack of assignment of tasks or the assignment of



absurd jobs or jobs below professional capacity or competencies occur. of the worker or the humiliation, contempt or public undervaluation of the employee.

**Sexual harassment:** Any behaviour, verbal or physical, of a sexual nature that has the purpose or has the effect of violating the dignity of a person; in particular, when an intimidating, degrading or offensive environment is created.

**Sexual harassment :** Any behaviour carried out based on a person's sex, with the purpose or effect of violating their dignity and creating an intimidating, degrading or offensive environment.

**Harassment based on sexual orientation :** Any behaviour carried out against a person because of their sexual orientation that may be considered offensive, humiliating, violent or intimidating with the purpose or effect of violating their dignity and creating a discriminatory environment.

**Harassment based on gender identity and expression:** Any behaviour or conduct that, for reasons of gender expression or identity, is carried out with the purpose or effect of violating dignity and creating an intimidating, hostile, degrading, offensive or segregated.

**Cyberbullying:** Workplace, sexual, gender-based, sexual orientation, gender identity and expression harassment behaviours when these are carried out through digital media. Through the recording, dissemination or publication of messages or images that affect the privacy or freedom of the victim in the workplace.

All the forms of harassment described above can occur between people of the same or different hierarchical level, whether or not they have a relationship of dependency within the organic structure of the entity or the workplace, whenever there is a potential position of abuse of power.

**Sexual blackmail:** the blackmailer is a person hierarchically superior to the victim who directly or indirectly conditions any employment decision (access to employment, permanence, improvement of working conditions...) on the acceptance of the sexual proposal (blackmail).



**Environmental harassment:** Behaviour of a sexual nature, of any type, that results in producing an intimidating, hostile, offensive and humiliating context. The harasser may be of higher or equal professional status to the victim. Example: comments, jokes, calendars and posters with erotic or pornographic content.

**Sexual assault :** Attacking the sexual freedom of another person without their consent. In all cases, acts of sexual content that are carried out using violence, intimidation or abuse of a situation of superiority or violation of the victim will be considered.

**Discriminatory acts:** Unfavourable action towards an employee or group of employees due to their marital status, family situation, birth, ethnic origin, age, sex, sexual orientation, religious or political ideas, membership in unions or any other condition or personal or social circumstance and which may materialize in a change of duties, personal insults, making derogatory comments about aspects of one's personal or professional life, offensive criticism, etc., with the purpose or effect of creating an intimidating, hostile or work environment. offensive and may negatively interfere with an individual's job performance and employment opportunities. In short, these are behaviours that are intended to isolate or ridicule a person for a personal condition or circumstance that distinguishes them from the rest of the staff. They are expressly prohibited in the principles of behaviour and action of the Company.

In accordance with the provisions of Organic Law 10/2022 of September 6, for the comprehensive guarantee of sexual freedom, and in article 48 of Organic Law 3/2007 of March 22, for the effective equality of women and men , is expressly included in this protocol, any conduct by action or omission, personal or collaborative, direct or indirect, by any physical or digital means, that violates sexual freedom and moral integrity at work, especially sexual harassment or based on sex, with any type of violence, threat, harassment, coercion, express or tacit, temporary or recurring, or discriminatory based on the above, regardless of sex, gender, racial or ethnic origin, nationality, religion or beliefs , health, age, condition, orientation or identity, disability, marital status, migration, administrative situation or another of an analogous intrinsic nature.





In accordance with the provisions of Law 4/2023 of February 28, for the real and effective equality of trans people and for the guarantee of the rights of LGBTBI people, and with the same terminology, it is expressly included herein protocol, any conduct by action or omission, personal or collaborative, direct or indirect, by any physical or digital means, that violates the freedom of gender and/or sexual choice and its corresponding manifestation and moral integrity at work, especially the harassment, with any type of violence, threat, coercion, express or tacit, temporary or recurring, or discriminatory due to the above, by direct or indirect, multiple or intersectional discrimination, by association or by mistake.

**Non-limiting examples of conduct and behaviours that, individually or in combination with others, evidence the existence of an indication of harassment:**

**Verbal Behaviors:** Offensive sexual jokes and comments about the physical appearance or sexual condition of the worker. Obscene sexual comments. Questions, descriptions or comments about sexual fantasies, preferences and abilities/abilities. Degrading or obscene ways to address people. Spreading rumours about people 's sex lives. Invitations or pressure to arrange dates or sexual encounters. Invitations, requests or demands for sexual Favors when they are related, directly or indirectly, to the professional career, the improvement of working conditions or the preservation of the job. Persistent invitations to participate in social or recreational activities, even though the person targeted has made it clear that they are unwanted and inopportune. Discriminatory or offensive sexual language.

**Non-verbal behaviors:** Use of videos, images, graphics, vignettes, photographs or drawings of sexually explicit or suggestive content. In particular, it will be considered aggravating if said images correspond to or simulate belonging to the person who is the target of harassment. Obscene gestures, whistles, impudent gestures or looks. Letters, notes or email messages, messaging systems or any electronic or digital means, of an offensive nature with sexual content. Behaviours that seek to humiliate or humiliate the worker due to their sexual condition. Discriminatory or offensive sexual body language.



**Behaviours of a Physical Nature:** Deliberate and unsolicited physical contact (pinching, touching, unwanted massages, etc ...) or excessive or unnecessary physical closeness. Cornering or deliberately seeking to be alone with the person unnecessarily. Intentionally or “accidentally” touching the sexual organs.

**Typologies of Harassment based on Sex, general circumstances:** Use of discriminatory behaviour due to being a woman or a man. Jokes and comments about people who take on tasks that have traditionally been performed by people of the opposite sex. Use of degrading or offensive forms to address people of a certain sex. Use of sexist humour. Ridiculing and disparaging the capabilities, skills and intellectual potential of women. Perform the above behaviours with lesbian, gay , transsexual, bisexual or intersex people. Repeated use of stereotyped expressions or expressions that denote a familiarity inappropriate for a work environment and not desired by the harassed person, such as “honey, honey...” Evaluate people's work with contempt, in an unfair or biased manner, based on their sex or their sexual inclination. Assigning tasks or jobs below the person's professional capacity or competencies.

Explicit or implicit conduct aimed at making restrictive or limiting decisions about the person's access to or continuity in employment, professional training, remuneration or any other matter related to working conditions.

Types of harassment based on sex due to pregnancy, motherhood or paternity Assigning a job of lower responsibility than your capacity or professional category. Attributing tasks that are meaningless, impossible to achieve or with irrational deadlines. Deliberately prevent their access to the appropriate means to carry out their work (information, documents, equipment, etc.). Arbitrarily deny you permits or licenses to which you are entitled.

**Typologies of Moral Harassment:** Social isolation measures, preventing or hindering personal relationships with other co-workers or clients. Persistent and negative behaviours or actions to harm personal or professional performance Separation of the worker from his or her duties of responsibility, for example entrusting him or her with work that may be considered humiliating Aggressive measures towards the victim, for example undervaluing his or her work in front of other members of the team staff, spreading unfounded rumours or attributing errors that she has not committed and/or manipulating her reputation by negatively predisposing her colleagues against her. Physical or verbal attacks, for example, imitating the worker,



mocking him, uttering insults or constant criticism of his or her personal life or offensive comments in order to ridicule him or her in public. Set of behaviours or actions conducted by one or more people systematically and over time, taking advantage of the organizational system and aimed at damaging the physical or psychological integrity of one or more people, with the aim of undermining their reputation and seriously damaging the exercise of their functions. Harassment conducted with the aim of harming the person who suffers it or causing them to leave the company.

### *B) Preventive measures*

To prevent, avoid and sanction harassing behavior in the Company, the following measures will be adopted:

- This Protocol will be included in the reception or welcome plan or manual aimed at new staff.
- This Protocol will be published both on the intranet and on the Company's external website or through the corresponding media.
- A training module on gender equality between men and women will be established, in order to avoid harassment situations in the Company.
- Data disaggregated by sex will be available annually on interventions and cases of workplace, sexual and gender-based harassment. The publication of this data will be done with the utmost professionalism and the anonymity of the people involved will be maintained at all times.
- The principle of zero tolerance of these behaviors will be respected, using, if necessary, the disciplinary measures provided for in the applicable labor legislation.
- The principle of co-responsibility will be established in the surveillance of work behaviours, with special entrustment to managers and management personnel.



### *C) Principles of action*

The Company guarantees the application of the procedure described below when a complaint of harassment or discriminatory act occurs. The action procedure will be governed by the following principles, which must be observed at all times:

#### **1. Priority and urgent processing.**

The procedure will be agile and fast. It will offer transparency and fairness. The investigation and resolution of the reported facts must be carried out with due professionalism, diligence and without undue delay; so that the procedure can be completed in the shortest possible time and with due respect for guarantees.

#### **2. Impartiality and contradiction.**

The procedure must ensure a fair hearing and equitable treatment for all persons involved. All persons involved in the procedure will act in good faith in the search for the truth and clarification of the reported facts. Therefore, an exhaustive investigation of the facts is sought and, if necessary, directed by specialized professionals.

#### **3. Duty of confidentiality and secrecy .**

The people involved in the procedures provided for in this protocol have the duty to maintain the most absolute confidentiality of the facts known to them by reason of their position in the exercise of the investigation and evaluation of the complaints, without being able to make any other use of the information . information obtained , nor for one's own benefit or that of third parties, or to the detriment of public interest.



#### **4. Respect and protection of the people involved.**

To guarantee the right to protection of the dignity and privacy of all people involved in the procedure; and in a very special way that of the allegedly harassed and harassing persons, respectively, the Company guarantees confidentiality in the procedure, instruction and custody of the related data.

#### **5. Respect for the rights of the parties.**

It will be guaranteed that the investigation of the complaint is carried out with sensitivity and respect for the rights of each of the parties.

**6. Guarantee of action** by adopting the necessary measures, including, where appropriate, disciplinary measures against the person or persons who carry out harassing behaviour and/or discriminatory acts. Likewise, in relation to whoever makes a false accusation or report, especially when bad faith is proven.

**7. Indemnity against retaliation**, guaranteeing that no adverse treatment or negative effect will occur on a person as a result of their presentation of a complaint or statement in any sense aimed at preventing the harassment situation and initiating the procedure. The same guarantee will be extended to those who act as witnesses in the procedure.

**8. Duty of information** . Regarding harassment files, the conclusions of the investigation and the actions taken will be transferred, where appropriate, to the Monitoring Committees of the Company's equality plan.

#### **9. Protection of personal data.**

The Company will guarantee, at all times, the privacy and protection of the personal data of those involved in the process, committing to comply with current legal regulations regarding the protection of personal data and the



guarantee of digital rights, applying to this end the different policies and procedures approved by the Company. The use of this protocol does not prevent any person within its scope of application from going, at any time, to the corresponding labor authorities, as well as, where appropriate, to the courts of law in defense of their legitimate rights.

## Competition

To guarantee the effectiveness of the Code of Conduct and internal compliance regulations, the Company has the Regulatory Compliance Unit (UCN), which is an executive body of an autonomous and independent nature, directed by the Compliance Director. The UCN is responsible for investigating, processing, investigating and proposing sanctions in relation to any conduct that constitutes a possible violation of the Code of Conduct and other regulations included in the Company's Regulatory Compliance Model.

In turn, Internal Audit is a corporate department of an autonomous nature, directed by its director and subordinate to the administrative body and first executive, whose functions are internal financial audit and internal control, with powers of investigation, processing, instruction and proposal. sanction in relation to any conduct contrary to internal regulations.

For its part, Global People is the company's human resources management department, including the selection of suitable professionals for each position, mission and responsibility, the management of associated knowledge and the development of talent, health and safety and equality.

The above three, represented by their respective directors, constitute the instructor body (hereinafter, OIR) of this protocol.

For their part, the first two manage the Complaints Channel: (i) they receive (both simultaneously) all the complaints filed (in anticipation of the possible conflict of one of them with the complaint received and without prejudice to the



powers of the same). administrative body and, where applicable, the Audit/Compliance Committee), ( ii ) decide on the admissibility or, where appropriate, inadmissibility of the complaint based on the established criteria, ( iii ) carry out the investigation, data collection , interviews, evidentiary material, etc. ( iv ) they prepare the provisional report and the proposal for sanction, or dismissal and (v) they submit the proposal to the resolution body, who they assist in the preparation of the final report and the sanction or archiving of the file, their work being in solidarity with each other. without prejudice to the tasks that each one has personally assigned or delegated.

The resolution body is the administrative body of the parent company, which may, where appropriate, delegate to the audit or compliance committee.

By agreement of the administrative body, the work of the instructing body of this protocol is joint among them, with ownership initially being attributed to Internal Audit without prejudice to the collaboration and reciprocal information between them. You may use any other department, under the strictest confidentiality, to manage the investigation.

Finally, the Good Practices Committee of Cox Group composed of the director of Global People; the director of Diversity, Equality and Inclusion; the director of Sustainability and Social Responsibility, the director of Compliance, the director of Internal Audit and the director of legal services (or to whom they permanently delegate); chaired by the legal director - secretary of the Board, acting as secretary the director of Internal Audit, according to its internal regulations, it is configured as a consultation and advisory body for the resolution body. In this way, the investigation report of each complaint will be complemented, where appropriate, with a report from the CBBPP, both of which will be submitted to the administrative body for resolution. In turn, knowledge of the cases included in this Protocol may be analyzed, in strict confidentiality and anonymity, with said Committee, for the purposes of possible improvement of the Code of Conduct,



this Protocol, the Equality Plan, etc., in accordance with the principles that are defined by regulation.

### **Chapter III. Action procedure of the Committee for the Prevention of Harassment (CBBPP)**

#### *A) Start of the procedure*

The procedure begins through a complaint, through any of the means or channels that the Company has established for this purpose<sup>1</sup>. The complaint, duly presented<sup>2</sup>, will begin the procedure, based on the following criteria:

1) The complaint must contain at least the following information:

- Identification of the complainant and contact information.
- Identification of the person reported and position held.
- A detailed and detailed description of all the events, narrated chronologically, with the people involved, background information and any other relevant information.
- Signature of the complainant as proof of compliance.

2) The affected person, the workers' representatives, or any other person who has knowledge of the facts may file the complaint. However, when the facts are not directly stated by the affected person, subsequent written confirmation will be required that they wish to have an investigation carried out.

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<sup>1</sup>Complaint Channeling Policy

<sup>2</sup>The recipient of the complaint will always do everything possible to continue the complaint, despite formal or material defects, in order to complete it for proper processing, except in cases of manifest lack of veracity or evidence.





3) The complaint will be communicated through any legally valid means. Specifically, it can be sent to:

1) the specific query and complaint line of the Complaints channel at the following email address:

[Audit\\_channel@Cox Group.com](mailto:Audit_channel@Cox Group.com)

2) by means of a letter sent to the Company's address at Energía Solar street, nº1, 41014 Seville, or

3) through the forms available both on the Company's intranet and on an external website ([www.Cox Group.com/](http://www.Cox Group.com/)).

[Complaints channel - Cox Group](#)

4) In the case of receiving a "verbal complaint", it will be required to collect it in writing in accordance with the previous requirements, as provided in the Complaint Management Procedure of the Complaints Channel.

The person subject to potential harassment may choose to be assisted in statements by a person of the same sex.

## **2. Preliminary phase**

Once a complaint is received in accordance with the provisions of the previous section, the OIR will preliminarily proceed to:

- Check that the complaint meets the requirements set out in said previous section. Otherwise, the person who filed it will be required to correct or complete it.



- Evaluate the existence of possible signs of harassment in the reported events, in accordance with the definitions included in this protocol, in order to activate the next phase of the procedure.
- Propose, where appropriate, the adoption of the necessary precautionary measures, before starting the investigation; for which it will be communicated to the Company's People Department for application. In the event that there are no signs of harassment and the facts may involve isolated conduct (except for a complaint of sexual harassment) or related to other work aspects, such as disagreements between workers, the next phase of this procedure will not be activated and It will be referred to the People Department for proper evaluation and treatment.
- Designation of one or more joint instructors (belonging to the OIR departments) to manage the investigation of the file.

### **3. Research**

The OIR may be coordinated with the area of Internal Audit, Legal, Human Resources, etc. and/or the corresponding business unit or country, so that they provide the necessary support in the investigation of the file, carrying out the actions and preparing the reports that were required for this purpose. During this investigation, both the parties and witnesses will be heard and any procedures deemed appropriate will be carried out. The parties may be assisted and accompanied by a trusted person, whether or not they are a representative of the workers, who must maintain secrecy regarding the information to which they have access. Likewise, they may provide all the means of proof they have available.

The investigation will be kept on consecutively numbered pages and each note recorded as a diary or log will be dated.



You will be assigned a file number and it will be registered in the Information System Record Book.

At any time during the investigation and as long as no signs of harassment are found and the circumstances of the case are taken into account, a quick and agreed solution can be reached between the parties. This will be communicated to the Company's HR Department, so that the appropriate measures can be adopted to carry out the solution reached.

#### **4. Conclusion**

Once the investigation is completed, the OIR will prepare a final report of conclusions that will contain the description of the reported facts, the concurrent circumstances, if applicable, the repetition of the conduct and the degree of impact on labor obligations, which will be transferred to the UCN for, where appropriate, its ratification. In any case, it must collect proposals for the adoption of measures regarding the facts appreciated and which have been objectively accredited based on the procedures carried out. This final report of conclusions must be prepared in the shortest possible time or, where appropriate, without exceeding a maximum period of 30 days from when the investigation of the file has been assigned, unless circumstances beyond the control of the committee occur that make this period. is delayed, in which case they must be reflected in the report. The report is not subject to any appeal.

#### **5. Adoption of measures**

If the existence of harassment is proven, the OIR will propose to the resolution body the measures to be adopted. The resolution body (OR), taking into consideration the recommendations of the UCN, will adopt the corresponding decision within a maximum period of 7 days, which may be from the ratification as definitive of the precautionary measures adopted, if applicable, during the processing of the file, until the adoption of other measures, including



appropriate disciplinary measures, including the sanction of dismissal for very serious misconduct by the employee. Within a maximum period of 30 days, the OR must confirm to the OIR the adoption of said measures. In the event that the existence of harassment is not proven, but other aspects related to the work environment or a possible labor conflict have been detected, the OIR may include in its proposal to adopt measures that the HR Department study those that may be put an end to this situation. If it is proven that a report is false or has been made in bad faith, the sanction deemed appropriate may be imposed on the employee who made it, in accordance with the applicable regulations and the established regime of infractions and sanctions. by the applicable Collective Agreement, including the sanction of dismissal for very serious misconduct by the employee.



### III. Validity

This Protocol will be valid indefinitely until a subsequent one is approved to repeal or modify it.

This Policy comes into force upon its approval by the administrative bodies with the consent of the workers' representation, on February 9<sup>th</sup>, 2024, applying to Cox Group (Cox Group) and controlled subsidiaries.

|         | Document Modification Control |             |
|---------|-------------------------------|-------------|
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## Annex I: Basic reference regulations

This Protocol is based on the current regulatory framework on equality, non-discrimination and prevention of harassment based on sex and gender. In this aspect, and in coherence with the normative pyramid, we first highlight the principles included in the Spanish Constitution, international and European regulations.

### Spanish Constitution.

- **Article 14** "Spanish people are equal before the law, without any discrimination based on birth, race, sex, religion, opinion or any other personal or social condition or circumstance."
- **Article 15** "Everyone has the right to life and to physical and moral integrity, without, in any case, being subject to torture or inhuman or degrading treatment or punishment. The death penalty is abolished, except as may be provided by military criminal laws for times of war."
- **Article 9.2** "It is up to the public powers to promote the conditions so that the freedom and equality of the individual and the groups in which they belong are real and effective; "remove obstacles that prevent or hinder its fulfilment and facilitate the participation of all citizens in political, economic, cultural and social life."

### International Regulations.

- **Declaration on the Elimination of Discrimination against Women (1967).**
- **Convention for the Elimination of All Forms of Discrimination against Woman (1979).** It establishes the principle of "Non-discrimination" and claims all the rights and freedoms of people, highlighting in Articles 10 and 11, the reference to equal rights between women and men in the student environment and at work. In addition, the **Committee for the Elimination of Discrimination against Women** is created, whose function is to monitor the proper application of the Convention by the States that have signed it, among which is Spain.
- **World Conferences on Women (Mexico, 1975; Copenhagen, 1980; Nairobi, 1985; Beijing, 1995)**, where the two fundamental strategies for the effective development of equality policies for women and men, gender mainstreaming and balanced representation).



- **Declaration on the elimination of violence against women (1993)**, in which Both the acts considered to be violence against women and the frameworks in which it is carried out are specified; considering among these harassment in the work environment.

### **Community Regulations.**

- **Treaty of Amsterdam (1997)**, which modifies the Treaty of Rome (1957) by including a specific reference to equality between men and women as a mission of the Community and incorporates the objective of eliminating inequalities between men and women and promote their equality, which should inspire all community actions and policies.
- **Charter of Fundamental Rights of the European Union (2000). Equality**

### **Article 20. Equality before the law.**

- All persons are equal before the law.

### **Article 21. Non-discrimination**

- All discrimination is prohibited, and in particular that exercised on the basis of sex, race, colour, ethnic or social origins, genetic characteristics, language, religion or convictions, political or any other opinion, membership of a national minority, heritage , birth, disability, age or sexual orientation.
- Any discrimination based on nationality is prohibited within the scope of application of the Treaty establishing the European Community and the Treaty on European Union and without prejudice to the particular provisions of said Treaties.



## **Article 22. Cultural, religious and linguistic diversity.**

- The Union respects cultural, religious and linguistic diversity.

## **Article 23. Equality between men and women.**

- Equality between men and women will be guaranteed in all areas, including in matters of employment, work, and remuneration. The principle of equality does not prevent the maintenance or adoption of measures that offer specific advantages in favour of the less represented sex.

## **Article 24. Rights of the minor**

- Minors have the right to the protection and care necessary for their well-being. They may express their views freely. This will be considered in relation to matters that affect them, depending on their age and maturity.
- In all acts relating to minors conducted by public authorities or private institutions, the best interests of the minor will constitute a primary consideration.
- Every minor has the right to periodically maintain personal relationships and direct contacts with his father and mother, unless they are contrary to his interests.

## **Article 25. Rights of older people**

- The Union recognizes and respects the right of older people to lead a dignified and independent life and to participate in social and cultural life.

## **Article 26. Integration of disabled people**

- The Union recognizes and respects the right of disabled people to benefit from measures that guarantee their autonomy, their social and professional integration and their participation in the life of the community.





**Directive 2002/73/EC of the European Parliament and of the Council of September 23 of 2002**, which modifies Council Directive 76/207/EEC, relating to the application of the principle of equal treatment between men and women in occupation, professional training and promotion, and to working conditions. Article 2 defines harassment and prohibits this type of behaviour.

**Directive 2006/54/EC of the European Parliament and of the Council, of July 5, 2006**, relating to the application of the principle of equal opportunities and equal treatment between men and women in matters of employment and occupation.