



Protocol for the 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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1. Introduction

In accordance with the principles, policies and commitments of **Grupo Cox** (Labor Social Responsibility Policy, Code of Conduct, Equality Framework Plan, among others, and in accordance 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 groups requiring special protection, (hereinafter the **Protocol**), in order to address and instruct any situation that may be classified as such, offering its employees all the necessary guarantees.

As a statement of principles included in its policies, **Grupo Cox** (Cox ABG Group, SA and its controlled subsidiaries; the group or Grupo Cox) expressly rejects all forms of discrimination, direct or indirect, based on sex, gender or identity and actively promotes equal treatment and opportunities for all.

Ensuring real and effective equality between women and men, trans people and the rights of LGBTI people are at the core of this Protocol, which protects all employees against any type of discrimination and against any type of moral, sexual, or gender-based harassment.

In accordance with the company's commitment, all staff must be treated with dignity, without any type of harassment or discriminatory act being permitted or tolerated based on origin, race, colour, 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 is intended to disrespect, degrade or humiliate its employees is strictly prohibited, including digital media.

The Company expresses its profound rejection of any discriminatory behaviour, particularly those of a sexual nature or connotation, and undertakes to work effectively to prevent, detect, correct and punish this type of conduct. It is also understood that discrimination in general, and sexual harassment in particular, seriously infringes the following rights: the right to privacy; the right to dignity;



the right to sexual freedom; the right to equality and non-discrimination; the right to health and safety; and the right to employment.

¹Organic Law 3/2007, of March 22, for effective equality between women and men; Royal Decree 901/2020, of October 13, regulating equality plans and their registration; Organic Law 10/2022, of September 6, on comprehensive guarantee of sexual freedom and Law 4/2023, of February 28, for real and effective equality of trans people and to guarantee the rights of LGBTBI people. See 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.

Grupo Cox, in accordance with its zero tolerance policy towards any manifestation of violence, harassment, verbal abuse, abuse of authority at work, discrimination or any other conduct that creates an intimidating or offensive environment, declares that relationships between people in the work environment 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 people who work there 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, their 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 career development.

professionalism of its staff. In this regard, the Company is committed to promoting a work environment free of all discrimination and any conduct that may involve harassment.

All employees of the group are responsible for ensuring a work environment in which the dignity and equal treatment of all people is respected, although staff



with responsibilities due to their position will be especially entrusted with the task of ensuring and preventing that no harassment of any kind occurs within their scope.

All persons covered by this Protocol have the right to use the procedures provided for therein with guarantees of not being subjected to intimidation or unfair, discriminatory or unfavourable treatment, even anonymously.

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

Any employee who is aware of a suspected case of harassment or discriminatory act must report it as soon as possible, using the means provided for in this Protocol. Both tolerance of harassment and concealment of such conduct may have disciplinary effects in accordance with current regulations.

2. Beginning

Chapter I. Purpose and scope of application

1. Object

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

2. Scope of application



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

3. Preventive actions

In order to prevent harassment of all kinds, measures will be promoted to prevent them from occurring, based on the principle that all persons have the right to respect for their privacy, due consideration for their dignity and non-discrimination in employment relationships, including:

Communication: promoting knowledge of this Protocol among all employees, using all means to disseminate it (Intranet, corporate website, social media profiles, etc.), disseminating in particular information regarding the procedure to follow to report a possible situation of harassment, raising awareness of the concepts of respect for dignity on which it is based, 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 include this subject specifically.

Commitment: All employees have the responsibility to help ensure a work environment in which dignity is respected. It is also an essential obligation of any manager or supervisor to ensure that an appropriate work environment is achieved, free of conduct that could constitute harassment, according to the terms contained in this Protocol. Therefore, managers must be entrusted with the task of ensuring and preventing harassment situations from occurring within their area, taking the measures they consider necessary to avoid conduct that could constitute harassment.



These actions will include:

- Contribute to preventing workplace harassment, sexual harassment and harassment based on gender at work by developing a Protocol for the Prevention of Workplace Harassment, Sexual Harassment and Harassment Based on Gender.
- Preparation and dissemination of an information document among staff on the prevention of harassment.
- Integrate the information document into the Welcome Plan / Welcome Manual.
- Periodically follow up on complaints received
- Train members of the management bodies in both harassment and the procedures set out 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 such situations and know how to act in each case.

Chapter II. General concepts

1. Definitions

Moral Harassment: Moral harassment is considered to be any act, conduct, practice or behaviour that, when carried out on a person in the workplace, directly or indirectly implies a loss or attack on his or her dignity, and may end up harming his or her integrity through the degradation of working conditions and the creation of an intimidating, offensive or hostile environment, whatever the reason that leads to the carrying out of such conduct and whether carried out by co-workers, superiors or persons subject to his or her dependency.

Workplace harassment or mobbing : Any conduct or practice that, within the scope of the employment relationship, and in a systematic and recurrent manner over time, entails a reduction or attack on the dignity of the employee, with the aim of subjecting him/her emotionally and psychologically, negatively affecting the work environment; and in such a way that his/her capacity for professional promotion or permanence in the job is nullified or diminished. This occurs if, in a continuous and repeated manner over time, conduct such as exclusion of the



employee from relationships with his/her colleagues, failure to assign tasks or assignment of absurd work or work below the professional capacity or skills of the employee, or humiliation, contempt or public undervaluation of the employee occurs.

Sexual harassment: Any behavior, verbal or physical, of a sexual nature that has the purpose or produces the effect of attacking the dignity of a person; in particular, where an intimidating, degrading or offensive environment is created.

Harassment based on sex : any behaviour carried out on the basis of a person's sex, with the purpose or effect of violating his or her dignity and creating an intimidating, degrading or offensive environment.

Harassment based on sexual orientation: Any behavior 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 behavior 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 environment.

Cyberbullying: workplace harassment, sexual harassment, harassment based on sex, sexual orientation, gender identity and expression when carried out through digital means. In particular, through the recording, dissemination or publication of messages or images that affect the victim's privacy or freedom in the workplace.

All the types 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, provided that 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 a work decision (access to employment, permanence, improvement of working conditions...) on the acceptance of the sexual proposal (blackmail).

Environmental harassment: Behavior of a sexual nature, of any kind, which results in an intimidating, hostile, offensive and humiliating environment. The harasser may be of a higher or equal professional rank than the victim. Examples: comments, jokes, pranks, calendars and posters with erotic or pornographic content...

Sexual assault: attacking the sexual freedom of another person without his or her consent. 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 in all cases.

Discriminatory acts: unfavourable behaviour 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 trade unions or any other personal or social condition or circumstance, which may take the form of a change of duties, personal insults, making derogatory comments about aspects of their personal or professional life, offensive criticism, etc., with the purpose or effect of creating an intimidating, hostile or offensive work environment that may negatively interfere with an individual's work performance and employment opportunities. In short, these are behaviours that seek to isolate or ridicule a person due to a personal condition or circumstance that distinguishes them from the rest of the staff. These are expressly prohibited in the Company's principles of behaviour and action.

In accordance with the provisions of Organic Law 10/2022 of September 6, on 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, 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 in



work, especially sexual harassment or harassment based on sex, with any kind of violence, threat, harassment, coercion, express or tacit, temporary or recurrent, or discrimination 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 any other situation of a similar intrinsic nature.

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

Non-limiting examples of conduct and behavior that, individually or in combination with others, indicate the existence of a sign of harassment:

Verbal Conduct: Offensive sexual jokes and comments about the physical appearance or sexual status of the worker. Obscene sexual comments. Questions, descriptions or comments about fantasies, preferences and sexual skills/capabilities. Degrading or obscene ways of addressing people. Spreading rumours about people's sex lives. Invitations or pressure to arrange dates or sexual encounters. Invitations, requests or demands for sexual favours when they are directly or indirectly related to a person's career, the improvement of working conditions or keeping a job. Persistent invitations to participate in social or recreational activities, even if the target of these has made it clear that they are unwanted and unwelcome. Discriminatory or offensive sexual language.

Nonverbal behaviors: Use of videos, images, graphics, cartoons, photographs or drawings with sexually explicit or suggestive content. In particular, it will be considered an aggravating factor if these images correspond or appear to belong to the person being harassed. Obscene gestures, whistles, lewd looks or gestures. Letters, notes or email messages, messaging systems or any



electronic or digital media, of an offensive nature with sexual content. Behaviours that seek to harass or humiliate the worker due to their sexual orientation. Discriminatory or offensive sexual body language.

Physical behaviors: 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

Types of Harassment on the grounds of Sex, general circumstances: Use of discriminatory behavior based on the fact of 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 derogatory or offensive ways to address people of a certain sex. Use of sexist humor. Ridiculing and belittling the capacities, skills and intellectual potential of women. Performing the above behaviors with lesbian, gay , transsexual, bisexual or intersexual people. Repeated use of stereotyped expressions or those that denote a familiarity that is inappropriate for a work environment and not desired by the harassed person, such as “honey, honey...” Evaluating the work of people with contempt, in an unfair or biased manner, based on their sex or sexual orientation. Assigning tasks or jobs below the professional capacity or skills of the person.

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

Types of harassment based on sex due to pregnancy, maternity or paternity. Assigning a job with a responsibility that is below your capacity or professional category. Assigning tasks that are meaningless, impossible to accomplish or with unreasonable deadlines. Deliberately preventing you from accessing the appropriate means to carry out your work (information, documents, equipment, etc.). Arbitrarily denying you permissions or licenses to which you are entitled.

Types of Moral Harassment: Social isolation measures, preventing or hindering personal relationships with other co-workers or clients. Persistent and negative behaviour or actions that harm personal or professional performance. Separation of the worker from his or her duties of responsibility, for example, assigning him or her work that could be considered humiliating. Aggressive measures towards the victim, for example, undervaluing his or her work in front of other members of the staff, spreading unfounded rumours or attributing



errors to him or her that he or she has not committed and/or manipulating his or her reputation, negatively predisposing his or her colleagues against him or her. Physical or verbal aggression, for example, imitating the worker, mocking, uttering insults or constant criticism of his or her personal life or offensive comments in order to ridicule him or her in public. A set of behaviors or actions carried out by one or more people in a systematic manner and over time, taking advantage of the organizational system and intended to damage the physical or psychological integrity of one or more people, with the aim of undermining their reputation and seriously harming the performance of their functions. Harassment carried out with the aim of harming the person who suffers it or causing them to leave the company.

2. Preventive measures

To prevent, avoid and sanction harassment behaviour in the Company, the following measures will be adopted:

- This Protocol will be included in the welcome plan or manual for new staff.
- This Protocol will be published on the Company's intranet and external website or through the appropriate means of dissemination.
- A training module on gender equality between men and women will be established in order to avoid situations of harassment 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 carried out with the utmost professionalism and the anonymity of the persons involved will be maintained at all times.
- The principle of zero tolerance for such conduct will be respected and, if necessary, disciplinary measures provided for in applicable labour legislation will be used.
- The principle of co-responsibility will be established in the monitoring of work-related behaviour, with special responsibility for managers and management personnel.



3. Principles of action

The Company guarantees that the procedure described below will be applied when a complaint of harassment or discriminatory act is made. The procedure for action 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 events must be carried out with due professionalism, diligence and without undue delays, 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 guarantee a fair hearing and equal treatment for all persons involved. All persons involved in the procedure will act in good faith in seeking the truth and clarifying the facts reported. Therefore, a thorough investigation of the facts is sought and, if necessary, directed by specialized professionals.

3. Duty of confidentiality and secrecy .

Persons involved in the procedures provided for in this protocol have the duty to maintain the most absolute confidentiality regarding the facts that they become aware of by reason of their position in the exercise of the investigation and evaluation of complaints, and may not make any other use of the information obtained, neither for their own benefit or that of third parties, nor to the detriment of the public interest.



4. Respect and protection for the people involved.

In order to guarantee the right to protection of the dignity and privacy of all persons involved in the procedure, and in particular that of the persons allegedly harassed and the harasser, respectively, the Company guarantees confidentiality in the procedure, instruction and custody of the related data.

5. Respect for the rights of the parties.

The investigation of the complaint will be ensured to be carried out with sensitivity and respect for the rights of each party.

6. Guarantee of performance

Adopting the necessary measures, including, where appropriate, disciplinary measures against the person or persons who carry out harassment and/or discriminatory acts. Likewise, with regard to anyone who makes a false accusation or complaint, especially when bad faith is proven.

7. Indemnity against retaliation,

Ensuring that no adverse treatment or negative effect will occur on a person as a result of their filing a complaint or making any statement in any way 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 to inform .

Regarding harassment cases, the conclusions of the investigation and the actions taken will be forwarded, 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 the current legal regulations regarding the protection of personal data and the guarantee of digital rights, applying 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 turning, at any time, to the corresponding labor authorities, as well as, where appropriate, to the courts of justice in defense of their legitimate rights.

4. Competition

To ensure 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, headed by the Director of Compliance. The UCN is entrusted with the functions of investigation, processing, instruction and proposing sanctions in relation to any conduct constituting a possible violation of the Code of Conduct and other regulations included in the Company's Regulatory Compliance Model.

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

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



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

For their part, the first two manage the Complaints Channel: (i) they receive (both simultaneously) all complaints submitted (in anticipation of a possible conflict of one of them with the complaint received and without prejudice to the powers of the administrative body itself and, where appropriate, the Audit/Compliance Committee), (ii) they decide on the admissibility or, where appropriate, inadmissibility of the complaint based on the established criteria, (iii) they carry out the research, data collection, interviews, evidence, etc. (iv) prepare the provisional report and the proposal for sanction or dismissal and (v) submit the proposal to the resolution body, which they assist in preparing the final report and the sanction or filing of the case, their work being jointly and severally among themselves, without prejudice to the duties that each has personally assigned or delegated.

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

By agreement of the administrative body, the work of the investigating body of this protocol is joint among them, with the ownership initially assigned to Internal Audit without prejudice to the collaboration and reciprocal information between them. It may be assisted by any other department, under the strictest confidentiality, for the management of the investigation.

Finally, the **Cox Group Good Practices Committee**, made up 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 whoever they permanently delegate); chaired by the Legal Director - Secretary of the Board, with the Director of Internal Audit acting as Secretary, according to its internal regulations, is configured as a consultation and advisory body for the resolution body. In this way, the investigation report of each complaint will be supplemented, 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 subject to analysis, 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 defined by regulation.

Chapter III. Procedure for the action of the Committee for the Prevention of Harassment (CBBPP)

1. Start of the procedure

The procedure is initiated by means of a complaint, through any of the means or channels that the Company has established for this purpose ¹. The complaint, duly submitted ², will start the procedure, taking into account the following criteria:

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

- The identification of the reporting person and contact information.
- Identification of the person reported and the position he or she holds.
- A detailed and itemized description of all the facts, narrated chronologically, with the people involved, background and any other relevant information.
- Signature of the reporting person as proof of compliance.

¹Reporting Policy

²The recipient of the complaint will always do everything possible to ensure that the complaint continues, despite formal or material defects, in order to complete it for proper processing, except in cases of manifest lack of veracity or indications.



2) The complaint may be filed by the affected person, the workers' representatives, or any other person who has knowledge of the facts. However, when the facts are not directly exposed by the

affected person, he/she will be required to subsequently confirm in writing that he/she wishes an investigation to be carried out.

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

(i) the specific query and reporting line of the Complaints channel at the following email address:

canal_denuncias@grupocox.com

(ii) by means of a letter sent to the Company's address at Calle Energía Solar, No. 1, 41014 Seville, or

(iii) through the forms available both on the Company's intranet and on the external website (www.grupocox.com).

4) In the event of receiving a "verbal complaint", it must be recorded in writing in accordance with the above requirements, as provided in the Complaints Management Procedure of the Complaints Channel.

The person who is the target of potential harassment may choose to be assisted in making statements by a person of the same sex.



2. Preliminary phase

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

- Check that the complaint complies with the requirements set out in the previous section. Otherwise, the person who filed the complaint will be required to correct or complete it.
- Evaluate the existence of possible indications 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 beginning the investigation; for this purpose the Company's Human Resources Department will be notified for their application. If there are no signs of harassment and the facts may be isolated conduct (except for a complaint of sexual harassment) or related to other work-related aspects, such as disagreements between employees, the next phase of this procedure will not be activated and the matter will be referred to the Human Resources Department for appropriate evaluation and treatment.
- Appointment of one or more joint instructors (belonging to the OIR departments) to manage the investigation of the case.



3. Research

The OIR may coordinate with the Internal Audit, Legal, Human Resources, etc. areas and/or the corresponding business unit or country, so that they may provide the necessary support in the instruction of the case, carrying out the actions and preparing the reports that are required for this purpose. During this instruction, both the parties and the witnesses will be heard and any steps deemed appropriate will be taken. The parties may be assisted and accompanied by a trusted person, whether or not a representative of the workers, who must maintain confidentiality regarding the information to which they have access. They may also provide all the evidence they have available.

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

A file number will be assigned and it will be registered in the Information System Registry Book.

At any time during the investigation, provided that no evidence of harassment is found and the circumstances of the case have been 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 containing the description of the reported events, the concurrent circumstances, if applicable, the repetition of the conduct and the degree of affectation on work obligations, and will forward this to the UCN for ratification,



if applicable. In any case, it must include proposals for the adoption of measures regarding the facts assessed and which have been objectively proven on the basis of the proceedings carried out. This final report of conclusions must be prepared as soon as possible or, where appropriate, within a maximum period of 30 days from the date on which the instruction of the case has been assigned, unless there are circumstances beyond the control of the committee which cause this period to be 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 (RO), taking into account the recommendations of the UCN, will adopt the corresponding decision within a maximum period of 7 days, which may range from the ratification as definitive of the precautionary measures adopted, where appropriate, during the processing of the file, to 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. If the existence of harassment is not proven, but other aspects related to the work environment or a possible labour conflict have been detected, the OIR may include in its proposal for the adoption of measures that the HR Department study those that can put an end to said situation. If it is proven that a complaint is false or has been made in bad faith, the employee who made it may be imposed the sanction deemed appropriate, in accordance with the applicable regulations and the regime of infractions and sanctions established by the applicable Collective Agreement, including the sanction of dismissal for very serious misconduct by the employee.



III. Validity

Entry into force: This document enters into force upon approval by the Board of Directors and will remain in force until it is updated, revised or repealed. The current version, revised in September, 29, 2024, is the current one, approved by the Board of Directors on November, 21, 2024. This policy must be kept up to date and may be revised annually, and on an extraordinary basis, whenever there are changes in the strategic objectives or applicable legislation, with the Compliance Director submitting a proposal for modification to the Compliance Committee, and from there to the Board of Directors.

Cox ABG Cox			
Policy	• Harassment Protocol		
Responsible	• Board of Directors		
Area	• Corporate – Regulatory Compliance		
Version Control	Date	Changes	
1	September 29, 2024 / Nov 21, 2024	majv	



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 and on its prevention in accordance with the provisions of the Spanish Criminal Code and concordant provisions in other jurisdictions. In this regard, and in line with the regulatory pyramid, we first highlight the principles contained in the Spanish Constitution, international and European reference regulations.

Spanish Constitution.

- **Article 14** "Spaniards are equal before the law, and there shall be no 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, and may not, under any circumstances, be subjected to torture or to inhuman or degrading treatment or punishment. The death penalty is abolished, except as may be provided for by military penal laws in times of war."
- **Article 9.2** "It is the responsibility of the public authorities to promote the conditions for the real and effective freedom and equality of individuals and of the groups of which they are a part; to remove the obstacles that impede or hinder their full realization and to 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 on the Elimination of All Forms of Discrimination against Women**
- **Women (1979).** 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 and work environment. 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, were established).
- **Declaration on the Elimination of Violence against Women (1993)**, which specifies both the acts considered to constitute violence against women and the contexts in which it is exercised; considering among these, harassment in the workplace.

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 promoting 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 people are equal before the law.

Article 21. Non-discrimination

- Any discrimination is prohibited, in particular discrimination based on sex, race, colour, ethnic or social origin, genetic characteristics, language, religion or beliefs, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation.
- Any discrimination on grounds of nationality is prohibited within the scope of the Treaty establishing the European Community and the Treaty on European Union and without prejudice to the specific provisions of those 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 shall be guaranteed in all areas, including employment, work and remuneration. The principle of equality does not preclude the maintenance or adoption of measures offering 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 freely express their opinions. These will be taken into account in relation to matters affecting them, in accordance with their age and maturity.



- In all acts relating to minors carried out by public authorities or private institutions, the best interests of the minor shall be a primary consideration.
- Every minor has the right to maintain regular personal relations and direct contact with his or her father and mother, unless this is contrary to his or her interests.

Article 25. Rights of older persons

The Union recognises and respects the right of older persons to lead a dignified and independent life and to participate in social and cultural life.

Article 26. Integration of disabled people

The Union recognises and respects the right of disabled persons 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 23

September 2002 amending Council Directive 76/207/EEC on the implementation of the principle of equal treatment for men and women in occupation, vocational training and promotion, and working conditions. Article 2 defines harassment and prohibits this type of conduct.

■ Directive 2006/54/EC of the European Parliament and of the Council of 5 July

2006 on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation.