



Compliance System

Code of Prevention of Harassment and Acts of Violence at Work

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1. Principles that IDOM considers applicable in working relationships

IDOM is committed to maintaining positive working environments for all individuals, free of harassment or violent behavior, in which dignity is respected and professional and personal development is facilitated, as set out in the IDOM Philosophy and Style of Action documents.

IDOM does not, among or towards persons working within it, tolerate any type of harassment or violence (verbal, written or gestural), whether it is discriminatory harassment (on the basis of gender, race, age, nationality, social origin, religion, disability, sexual orientation, marital status, political ideas, membership or not of trade unions or any other), sexual harassment, bullying (undermining of dignity, blocking of professional development, etc.), physical violence or psychological violence.

Specifically, to promote working conditions that prevent harassment in all its forms, and thus guarantee the dignity, integrity and equal treatment of all workers, this joint Code is established for application throughout IDOM, and to this end the elements, instruments and reporting procedures set out below shall extend in general to all persons at IDOM and at any of its workplaces.

The utmost responsibility for the integration and application of this Code of Conduct lies with the Ethics and Regulatory Compliance Committee, which shall ensure that this Code is fully distributed, is respected by all persons belonging to IDOM, is supplemented by any necessary implementing regulations, and is constantly updated.

2. Object of the Code on Prevention of Harassment and Acts of Violence at Work

The object of this “Code on Prevention of Harassment and Acts of Violence at Work” (hereinafter, the Harassment Prevention Code) at IDOM is to prevent conduct comprising:

- **Harassment to the fullest extent and all variants**, i.e., bullying, discriminatory harassment and sexual harassment.
- **Violent harassment at work**, both physical and psychological, whether carried out with a discriminatory motive or not.

To this end, the Harassment Prevention Code thus aims to establish measures by means of which IDOM attempts to prevent and avoid forms of harassment or acts of discriminatory violence at work, whether physical or psychological.

In the event that, although an attempt has been made to prevent such situations, an internal report or complaint is made by any person regarding alleged harassment or acts of physical or psychological violence at work, IDOM has in place an “Incident management procedure related to the Code of Conduct”, defining IDOM’s reaction to the complaint filed.

IDOM will inform all its people of this Harassment Prevention Code in electronic format, via its intranet.

3. Definitions of prohibited conduct

Although it is understood that all IDOM individuals are aware of the prohibited conduct, either because this is implicitly indicated in the Philosophy and the Style of Action, because it is confirmed in the daily actions of their people, or because it is reflected in the legislation in force, the aforementioned conduct is defined below:

3.1. Moral harassment

Moral harassment, or bullying, is any conduct, practice or behavior, systematically or repeatedly performed within the context of a working relationship, that directly or indirectly constitutes harm to or an attack on the dignity of a person, through an attempt to subjugate the person emotionally and psychologically in a violent or hostile manner, and that pursues or has the effect of nullifying their capacity, professional promotion or tenure in the workplace, negatively affecting the working environment.

By way of example, those forms of conduct that could, in isolation or in combination with others, whether passive or active, ultimately constitute moral harassment of an individual, would include in particular the following, wherever they occur on a systematic and recurrent basis:

- They are ignored, excluded or disregarded.
- Their work is evaluated unfairly or in a biased manner, with disparaging criticism of their work.
- They are given no work to do, even on their own initiative, or are given absurd, impossible, or senseless tasks or jobs.
- They have an unbearable workload imposed in a manifestly malicious manner, or that endangers their physical integrity or health.
- They are the victim of verbal slurs, insults, shouting.
- They receive criticism and reproach for anything they do or any decisions they take at work.
- Their decisions are systematically questioned or answered.
- They are humiliated, denigrated or disrespected in public in front of other colleagues or third parties.
- Others make fun of their private life.
- Gossip and orchestrated rumors are created about them.
- Their gestures, posture or voice are regularly imitated or nicknames are assigned to them, to ridicule them.
- Their work is monitored, annotated, inspected and recorded unfairly on malicious terms.
- Professional development opportunities are denied.
- They are isolated and relocated away from their colleagues.

If such conduct occurs only occasionally, this shall not in itself constitute moral harassment, although it may give rise to the adoption of corrective and/or disciplinary measures.

3.2. Discriminatory harassment

Discriminatory harassment is defined as any conduct performed on the basis of any of the grounds for discrimination forbidden by the applicable regulations (age, birth, origin, religion, disability, sexual orientation, marital status, political philosophy, membership or otherwise of trade unions, etc.), with the aim or consequence of violating the dignity of a person and creating an intimidating, hostile, degrading, humiliating, offensive or segregating environment.

3.3. Discriminatory harassment on the basis of gender

Discriminatory harassment on the basis of gender is understood as any behavior, conduct or practice performed in accordance with a person's gender, with the purpose or effect of violating their dignity and creating an intimidating, degrading or offensive environment.

Harassment on grounds of gender shall likewise include any hostile conduct based on a worker having exercised or intending to exercise rights derived from family responsibilities, such as, for example, maternity leave itself, reduction of working hours for childcare or breastfeeding leave.

Harassment on grounds of gender shall likewise include any adverse treatment or negative effect generated against an individual as a result of them filing a complaint, claim, report, demand or appeal of any kind, intended to prevent discrimination against them and to demand effective fulfillment of the principle of equal treatment of women and men.

3.4. Sexual harassment

Sexual harassment is any behavior, verbal or physical, of a sexual nature that has the purpose or effect of violating the dignity of a person, particularly when creating an intimidating, degrading, or offensive environment.

The action taken by the harasser must be unwelcome and rejected by the harasser. If such action is accepted and consented to by the recipient, there would be no sexual harassment.

Sexual harassment actions at work need not take place over an extended period of time. A single action may, because of its seriousness, constitute sexual harassment.

Specific behaviors may thus be identified that would, for example, constitute sexual harassment:

- Upsetting, humiliating, sexually explicit or implicit innuendos and comments.
- Obscene comments, jokes or banter, direct or indirect sexual advances.
- Letters, notes or emails with sexual content that suggest, incite or pressure a person into sexual relations, or that, without pursuing such objective, simply offend or intimidate the recipient.
- Repeatedly derogatory or offensive comments of a sexual nature about anyone's appearance and image.
- Touching, obscene gestures, unnecessary physical closeness.
- Any sexual assault.
- Participation in the creation of a working climate that constitutes what is known in case law as "environmental sexual harassment", understood as physical or verbal behavior manifested in acts, gestures or words, behavior that is also perceived as unwelcome and undesirable by the person receiving it, and which, although not directly aimed at requesting favors of a sexual nature, is capable of creating an odious and unwanted climate, through, for example, repeated comments or jokes of lewd content or with constant and unnecessary references to sexuality.
- The conditioning of a right or expectation of a right on acceptance of a situation constituting sexual harassment.

3.5. Acts of violence at work

Acts of violence are prohibited at IDOM, whether physical violence or psychological or verbal violence.

- **Physical violence:** physical violence conduct shall be understood as conduct involving an assault of a physical nature between persons belonging to IDOM or between persons from different companies providing services in the same workplace.

- **Psychological violence:** behaviors that involve psychological aggression between workers, that generate hostility, etc., and could undermine the dignity and moral integrity of the person.

This is usually expressed verbally or in writing, but may also occur through mere gestures of contempt, or acts of social rejection in relations between colleagues (ignoring questions to a colleague, especially in public, manifestly restricting communication, etc.).

Behaviors of psychological violence, if they occur repeatedly or systematically, may constitute harassing behavior (either moral harassment, or harassment based on a cause of discrimination).

- **Psychological violence on a discriminatory basis:** if these acts of psychological violence are carried out on the basis of any of the grounds for discrimination prohibited by law, such as gender, racial or ethnic origin, religion, beliefs, etc., they would furthermore become discriminatory acts, an aggravating circumstance that is likewise considered to be covered by this Code.

Specific behaviors may thus be identified that could, for example, constitute acts of violence with or without a discriminatory element:

- Shouting or insults by one worker towards another, alone or in a group.
- Gross gestures of contempt.
- Ignoring a colleague's questions, especially in a group.
- Ridiculing a comment made by a person in front of other colleagues, whether they are comments about work or personal aspects.
- Addressing verbally or sending an email or communications that are particularly inappropriate or rude, or involve some intimidation or aggression because of their content or forms, or otherwise contain some lewd aspect. In the latter case, depending on the seriousness or recurrence, this may constitute sexual harassment.
- Showing photographs of a person to other colleagues revealing aspects of their image or privacy that create an uncomfortable situation for them.
- Verbal responses revealing bad manners, using a derogatory tone or with inappropriate, rude or unpleasant content, according to social norms.
- Physical assault, fighting, etc.

4. Prevention of harassment and acts of violence at work

In order to prevent harassment and violence at work, IDOM implements the following preventive measures:

- (i) IDOM promotes an atmosphere of respect and propriety in the working environment.
- (ii) IDOM instills in all people, both those who join IDOM and those who already belong, the values of equal treatment, respect, dignity and free personal development.
- (iii) The day-to-day personal relationships between IDOM people must be based on polite treatment, governed by good manners.
- (iv) IDOM prohibits the use of obscene language, as well as offensive or sexist jokes or comments, whatever the means of communication employed (verbal, email, fax, etc.).
- (v) IDOM prohibits attitudes of insinuation or manifestations of a physical nature, gestures, looks, touching, deliberate physical contact, etc.
- (vi) IDOM prohibits acts of contempt towards a colleague, shouting, emails or verbal statements that involve intimidation, have unpleasant content, use particularly vulgar words, insults, and any other manifestation of psychological violence.
- (vii) IDOM prohibits any threats related to exerting physical violence, as well as any insinuation of the above.
- (viii) IDOM aims to integrate new entrants, avoiding attitudes of isolation, by monitoring the new entrant not only in their initial onboarding process but also thereafter.
- (ix) IDOM acknowledges the personal or cultural circumstances of the incorporated person, wherever they are known, at all times with full respect for the privacy of each person, and takes them into consideration to contribute to their integration, by providing the resources available to it through the management conducted in this regard by the People Area.
- (x) IDOM provides information and training for its people about the principles and values to be respected, as well as the behaviors that are not tolerated.
- (xi) IDOM guarantees the absence of discriminatory actions on the basis of gender, origin, including racial or ethnic origin, marital status, age, social status, religion or beliefs, political philosophy, sexual orientation, membership or otherwise of trade unions, language, relationship with other persons at IDOM, or any other personal status that has historically been the object of oppression or segregation or that is established by the Law, serves as the basis for, or is intrinsically connected with acts of psychological or physical violence at work.

If IDOM finds that, even in the absence of a specific situation of harassment or violence at work, any of the prohibited conduct described above in sections (iv), (v), (vi), (vii) and (xi) occurs, being seen among a particular group, working team, department, etc., it shall immediately contact the corresponding supervisor to:

- Remind them of the existence and validity of this Code and its content, specifically, unacceptable conduct.

- Inform them of the extent of the potential violation of the Code.
- Call on them to stop such behavior to prevent a possible future context of harassment.
- Offer the opportunity of a meeting or conversation with the manager or the other individuals to discuss what happened, in an attempt to normalize the situation.

All these measures and declarations constitute IDOM's actions regarding the prevention of situations liable to give rise to harassment or violence at work, whether or not discriminatory.

Through these preventive measures, IDOM lays the foundations for optimal coexistence at work, safeguarding the fundamental rights of all IDOM people.

Lastly, IDOM undertakes to continue working on new measures to prevent harassment and acts of violence at work, and to implement the above in a timely manner and to keep itself informed of developments in society in this regard.

5. Protocol of action to address reports of harassment or acts of violence at work

If an IDOM person believes that a situation of harassment is occurring or has occurred, or events liable to be considered harassment or acts of violence at work, both physical and psychological, they must be reported in accordance with the terms set out in the “Incident management procedure connected with the Code of Conduct”.

6. Validity of this Code

This Code on the Prevention of Harassment came into force on the day of its approval by the Board of Directors of IDOM, S.A.U. (meeting of May 11, 2016).

This Harassment Prevention Code shall be reviewed and updated by IDOM's Ethics and Compliance Committee when deemed necessary by IDOM due to legislative modifications or commitments made by IDOM in terms of corporate responsibility and good governance.