

**WORKPLACE HARASSMENT,  
SEXUAL HARASSMENT AND  
SEXUAL DISCRIMINATION  
PROTOCOL**

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## 1. Purpose

Respect and dignity are the basis for relations with and among NATURGY employees. The company also understands that these relationships must be built on the principles of trust, respect, equal opportunities, the reward for merit and the results obtained.

Therefore, and in accordance with the provisions of the NATURGY Code of Ethics, employees must be treated with respect, fostering friendly relationships as well as a pleasant, healthy and safe working environment, which implies the obligation to treat one's companions, superiors and subordinates fairly and respectfully.

NATURGY expressly rejects and prohibits any demonstration of physical, psychological, moral, or sexual harassment because of gender or abuse of authority. The company also expressly rejects and prohibits any other conduct that may generate an intimidating, offensive or hostile work environment for people.

The prevention and action protocol against workplace harassment, sexual harassment and sexual discrimination is designed to provide the necessary measures to avoid any situation of workplace harassment or sexual harassment, to define guidelines that identify such a situation and to establish a procedure of action in cases of such situations, while attempting, at all times, to ensure the rights of the victims

## 2. Scope

It is aimed at all NATURGY staff, regardless of the type of contract that defines their employment relationship, the position they occupy or where they work.

## 3. Definitions

### 3.1. Workplace Harassment

This refers to what in more concrete terms is known as "moral or psychological harassment at work", otherwise known as "mobbing."

It consists of exposure to behaviours involving intense psychological violence, directed repeatedly and prolonged in time towards one or more people, by person(s) who act against others from a position of power (not necessarily hierarchical but in psychological terms), with the purpose or effect of creating a hostile or humiliating environment that disrupts the victim's working life. Such violence occurs within the framework of a working relationship, but does not respond to organisational needs and it represents both an attack on the dignity of the person as well as a risk to their health.

### 3.2. Sexual harassment

This refers to the situation in which any behaviour, either verbal or physical, of a sexual nature occurs that has the purpose of or actually manages to undermine the dignity of



a person, particularly when it creates an intimidating, degrading or offensive environment.

### 3.3. Sexual discrimination

This refers to the situation in which any behaviour occurs based on the gender of a person, with the purpose or actual effect of violating their dignity and creating an intimidating, degrading, humiliating or offensive environment.

The conditioning of a right or an expectation of the right to accept a sexual harassment or discrimination situation on the grounds of gender shall also be considered an act of sexual discrimination.

## 4. Responsibilities

The Human Resources Department is responsible for the overall management of the procedure of this Protocol, ensuring its correct application and monitoring, so that it is constantly updated with real operation.

## 5. Development

### 5.1. Preventive action

On the part of Company management, and in order to avoid situations of harassment (workplace, sexual or discrimination) actions are aimed at preventing, for example:

- **Communication:** All available means will be used to ensure the knowledge of this protocol among all company people.
- **Training:** This subject will be included in training programs where it is relevant, aimed at the entire workforce and especially at the people in charge of staff.
- **Responsibilities:** In accordance with the provisions of this protocol, all employees have the obligation and responsibility to establish and maintain their relationships based on respect and dignity. Moreover, managers will have the following additional responsibilities:
  - ✓ To ensure that the people they are responsible for know and understand the content of this protocol.
  - ✓ To ensure that there is no harassment (workplace, sexual or gender-based) within their scope.
- **Collaboration:** All employees must inform their hierarchical superiors of any possible cases of harassment (workplace, sexual or gender-based) they may be aware of.

### 5.2. Action procedures

#### 5.2.1. Informal procedure

It is recommended that in case of becoming a victim of a harassment situation (workplace, sexual or gender-based) the person concerned shall inform the



alleged aggressor that such behaviour is not tolerated, that it is offensive and that interferes with their work.

If, despite the attempted informal resolution of the conflict, the situation continues or if the employee concerned considers that the fact of communicating their disagreement to the person who is causing the situation will not resolve the conflict, they must begin the formal procedure detailed below.

### 5.2.2. Formal procedure

#### 5.2.2.1. Beginning the procedure

The procedure may begin from any of the following channels:

- Notification addressed to the Commission of the Code of Ethics using the form published in the Practical Guide of the Code of Ethics on the NATURGY intranet and which must be sent to the Commission via the channels indicated in this Practical Guide. The Code of Ethics Commission will contact the corresponding Business, Service or Project Resources Unit.
- They shall contact the immediate hierarchy superior, who will in turn contact the Business, Service or Project Resources Unit concerned.
- The complaint is made to the Human Resources or to the corresponding Business, Service or Project Resources Unit.

The notification/complaint may be made in writing by the person allegedly harassed, their legal representative or the worker representatives, as well as any employee who has knowledge of the situation.

#### 5.2.2.2. Investigation

Once the complaint is received, the receiving unit must decide whether, in view of its content, it is admitted for processing and if the investigation phase should begin.

In this phase, the required information will be collected and, if necessary, interviews will be carried out with those involved (complainant and person denounced) and witnesses, if any.

The inquiry about the complaint is to be conducted with utmost sensitivity and respect for the rights of each of the parties involved.

#### 5.2.2.3. Precautionary measures

Initially or at any time throughout the investigation phase and where there are signs of harassment (workplace, sexual or gender-based), precautionary measures may be taken, including mobility.

Similarly, if deemed necessary, the involvement of the Medical and Integral Health Support unit may be requested at any time.



## 5.2.2.4. Report on conclusions and resolution of the procedure

Once the investigation phase is completed, the unit in charge will issue, preferably within a maximum of 3 weeks, a report of conclusions in which one of the following decisions must be taken:

- The complaint is filed due to lack of substance or insufficient evidence.
- The beginning, as quickly as possible, of disciplinary proceedings for a very serious offense when there are clear indications of harassment (workplace, sexual or gender-based).
- The beginning, as quickly as possible, of the disciplinary inquiry for the corresponding offence when the investigation commission if they discover any other offense, other than workplace, sexual or gender-based harassment, and the disciplinary proceedings will be started, if it should be discovered that the accusations, allegations or declarations during the proceedings of any of the parties were not honest or intentional.

This report will also contain the appropriate corrective measures.

In any case, the parties involved will be informed of the decisions taken.

## 6. Procedural Guarantees

- The anonymity of the complainant will be ensured at all times.
- At any time, either party may request the intervention of the legal representatives for workers or the corresponding prevention delegates.
- The procedure will be completed in the shortest possible time respecting the due guarantees.
- An impartial hearing and fair treatment is guaranteed for all people involved
- The right to honour of the persons will be one of the maxims of action for all those involved in the procedures included in this protocol.
- It is formally stated that reprisals will not be tolerated against those who have made use of the notification procedures regulated herein or on those who have intervened as witnesses or have participated otherwise.
- The protection of the identity of the informants and of the persons that may be involved in the procedures is guaranteed, as is the confidentiality of the information received.
- The various internal units that may be involved are subject to the same commitments regarding anonymity, confidentiality and non-retaliation, which also apply to the Ethics Code Commission, and they will have access to the identities of those involved only to the extent that such information is essential for the resolution of the corresponding investigation.



- An identification number will be used and the name of the alleged victim of harassment (workplace, sexual or gender-based) will be omitted in all communications that result from the measures taken.
- In any case, the application of this protocol will not prevent the use, either parallel or subsequent, by the persons involved, of actions provided for by law.

### **7. Information for the Monitoring Committee**

Preserving the confidentiality provided in point 6.7 of this Protocol, the Human Resources Department will provide information on the cases analysed to the Monitoring Commission of the Naturgy Equality Plan.

### **8. Effective date and entry into force.**

This Protocol enters into force on the 24th of July 2013 and its format was updated on 7th of October 2019.