



PROTOCOL FOR THE PREVENTION OF AND RESPONSE TO SEXUAL OR GENDER-BASED HARASSMENT IN THE WORKPLACE

Allfunds Bank



Changes and Updates:

DATE	VERSION	Author	DESCRIPTION
October 2020	1.1	HR	SEXUAL OR GENDER-BASED HARASSMENT IN THE WORKPLACE PROTOCOL

1. DECLARATION OF PRINCIPLES

- All employees have the right to be treated with courtesy, respect, and dignity, and to the protection of their fundamental employment rights. The Code of Conduct, which applies to all employees of Allfunds, states that “Harassment, abuse, intimidation, and any lack of respect and consideration are unacceptable and will not be permitted or tolerated in the workplace. Employees who manage other employees within the organisational units of the Group must use the means available to them to avoid such situations”.
- The purpose of this protocol is to prevent moral, sexual, or gender-based harassment, as all such behaviours violate a person’s dignity, are harmful to the workplace environment, and cause undesirable consequences to peoples’ health, confidence, and self-esteem.
- In this protocol, Allfunds establishes a series of measures and actions to take in situations that can be construed as harassment, while respecting the intimacy of the individuals involved, and maintaining confidentiality, objectivity, and neutrality throughout the process.
- Allfunds will take the necessary corrective measures to protect individuals affected by harassment situations.

2. GENERAL DEFINITION OF HARASSMENT

According to the ILO, “violence and harassment” in the world of work refers to a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment

The term “gender-based violence and harassment” means violence and harassment directed at persons because of their sex or gender, or affecting persons of a particular sex or gender disproportionately, and includes sexual harassment.

3. TYPES OF HARASSMENT

Moral harassment: Moral harassment is defined as a situation in which an employee or group of employees exercise extreme, abusive, and unfair psychological violence in a systematic and

recurrent manner, for a prolonged period of time, against another employee or employees in the workplace, in order to destroy their communication network, destroy their reputation, undermine their self-esteem, disturb their work, deliberately degrade their working conditions, and finally succeed in that person or persons abandoning their job, causing progressive and continuous damage to their dignity.

There are three types of harassment depending on who is engaging in the harassment behaviour:

- VERTICAL DESCENDANT MORAL HARASSMENT: The person guilty of harassment is higher up in the hierarchy than the victim.
- HORIZONTAL MORAL HARASSMENT: Occurs among colleagues of the same or similar hierarchical level.
- VERTICAL ASCENDANT MORAL HARASSMENT: The person guilty of harassment is lower in the hierarchy than the victim.

Sexual harassment: As set out in the Spanish Law for Effective Equality between Women and Men, sexual harassment is any verbal or physical behaviour of a sexual nature that has the purpose or effect of violating the dignity of a person, particularly when it creates an intimidating, degrading, or offensive environment.

Behaviours classed as sexual harassment may be:

- **Physical**: physical violence, touching, unnecessary closeness.
- **Verbal**: comments and questions regarding appearance, lifestyle, sexual orientation, offensive telephone calls.
- **Non-verbal**: whistling, sexually suggestive gestures, etc.

Gender-based harassment: Pursuant to the Law for the Effective Equality between Women and Men, gender-based harassment is any behaviour that targets the gender of a person with the purpose or effect of violating their dignity and creating an intimidating, degrading, or offensive environment.

Subjecting a right or expectation of a right to the acceptance of a situation that constitutes sexual or gender-based harassment will also be considered an act of gender-based harassment

4. RESPONSE PROCEDURE

The harassment protocol will be initiated by a written complaint made through the Whistleblowing Channel on the Corporate Intranet, in accordance with Section 5 of the General Code of Conduct.

Complaints may be anonymous and, in any case, will be managed with all due confidentiality, without any retaliation against the whistleblower if they have been identified. All information will be processed in accordance with applicable data protection regulations.

In any case, the complaint must state the name of the person being harassed, the name of the individual or individuals accused of harassment, as well as details regarding the facts and behaviours leading to the complaint, including dates, witnesses, places, and/or any other type of information that may be relevant to the case.

The Regulatory Compliance Unit will process complaints with due diligence and promptness, endeavouring to verify the facts and implement measures to achieve a resolution, according to the management procedures of the Whistleblowing Channel established in the Code of Conduct. In any case, the investigation process will take no more than 10 days, as set out in article 55.4 of the Bank's Collective Agreement.

If necessary, the Company may adopt any precautionary measures it deems appropriate during the course of the investigation, such as ensuring that the whistleblower and accused do not share the same work environment.

The report, which will be shared with the whistleblower, may conclude in any of the following ways:

1. If it is confirmed that harassment took place, the case will be referred to the Chief People Officer, who will take the disciplinary measures they deem appropriate according to the Collective Agreement and applicable law.
2. If it is concluded that harassment did not take place, or there is a lack of evidence, the complaint will be archived.

3. If it is shown that the complaint is manifestly and unequivocally false, the case will be referred to the Chief People Officer, who will take the disciplinary measures they deem appropriate.

Lastly, when appropriate, the Regulatory Compliance Unit will report the result of the investigation to the Board of Directors and the Audits and Risk Committee, while protecting the confidentiality of the whistleblower and, where appropriate, the accused individual or individuals.

5. SCOPE OF APPLICATION

This protocol applies to all employees of Allfunds notwithstanding any modifications that may be needed to comply with local regulations and collective bargaining agreements.