

COMPANY: ANTOLIN

COUNTRY: ALL

INDEX:

I. OBJECTIVE	2
II. SCOPE	2
III. DECLARATION OF PRINCIPLES	2
IV. LEGAL BASIS.....	2
V. DEFINITIONS	2
VI. SEXUAL HARASSMENT	3
SCOPE/ COVERAGE	3
FORMS OF SEXUAL HARASSMENT	3
HARASSMENT OCCUR WHEN	4
WHAT IS NOT HARASSMENT?	4
VII. SEX-BASED HARASSMENT OR DISCRIMINATION	4
WHAT IS SEX-BASED HARASSMENT OR DISCRIMINATION?	4
HOW TO RECOGNIZE SEX-BASED HARASSMENT?.....	4
VIII. MORAL HARASSMENT	5
WHAT IS MORAL HARASSMENT?	5
HOW TO RECOGNIZE MORAL HARASSMENT?	5
WHAT ARE THE CONSEQUENCES OF MORAL HARASSMENT AT WORK?.....	5
THE COST OF HARASSMENT AT WORK	6
IX. PREVENTING MEASURES	6
X. ACTION PROCEDURE (COMPLAINT AND PROCESSING).....	6
XI. PROCEDURE OF INVESTIGATION	7

COMPANY:

ANTOLIN

COUNTRY:

ALL

I. OBJECTIVE

This Policy is expected to be able to provide guidance to employees, managers, vendors, suppliers, workers at ANTOLIN on preventing and effectively responding to workplace harassment.

II. SCOPE

This Policy applies to all Antolin employees, regardless of their contractual relationship or type of employment contract, subcontractors and collaborators of the Company, including all ANTOLIN subsidiaries and affiliated companies at their workplace or at business partner and supplier & client sites.

III. DECLARATION OF PRINCIPLES

The Company will not tolerate any form of harassment, if engaged in by clients or by suppliers or any other business associates. Furthermore, this policy shall be used as an instrument to raise awareness and education in preventing harassment in the workplace.

In accordance with this commitment, ANTOLIN establishes a procedure and declare the following statements:

- Any form of harassment is against the dignity of people.
- Zero tolerance towards any kind of harassment.
- Any type of harassment is strictly forbidden.
- Victims of harassment shall always be protected by the Company.
- All employees, especially managers, have the obligation to help and ensure an open working environment for everybody to feel safe in.

IV. LEGAL BASIS

The content of this Policy is based on international standards and relevant legislations.

V. DEFINITIONS

Harassment

Harassment frequently involves an abuse of power where the targets can experience difficulties in defending themselves. Harassment at the workplace is any unwelcomed and offensive action, repeated and unreasonable act, addressed to a worker or a group of workers that causes difficulty in the performance of an assigned job or causes a worker to feel that he/she is working in a hostile working environment. This can also cause risk to the health and safety of the worker.

COMPANY:

ANTOLIN

COUNTRY:

ALL

Workplace

Workplace means a physical place, close or open, movable or stationary, where workers work, or is frequently entered by a worker for business, including all rooms, fields, lawns and surrounding areas that constitutes parts of, or are connected with the place of work.

From the above definition, a workplace does not only include physical places where work is performed during working day, such as office or factory. Workplace also includes all locations where employment-related business is conducted as a result of employment responsibilities or employment relationship, in locations such as work-related social functions, conference and training sessions, official business travel and lunches, dinner, or promotional campaigns organized for client or partners, telephone conversations, and communications through electronic media.

VI. SEXUAL HARASSMENT

Sexual harassment is **any unwanted** conduct of a sexual nature, request for sexual favors, verbal or physical conduct or gesture of a sexual nature; or other behavior of a sexual nature that makes the recipient feels humiliated, offended and/or intimidated, where such reaction is reasonable in the situation and condition; or made into working requirement or create an intimidating, hostile or inappropriate working environment.

In other words, sexual harassment has a number of key elements:

1. Misuse of sexual behavior or with sexual connotations;
2. Produce the effect of undermining the dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment;
3. Unwanted action of a sexual nature, that the recipient has made it clear that the behavior is unwanted and the perpetrator should have reasonably anticipated that the other person would be offended, humiliated and/or intimidated by the conduct.

SCOPE/ COVERAGE

Harassment can occur to everyone. Both men and women can be victims or perpetrators of conducts that is considered rude, humiliating or intimidating. Whether a conduct or behavior is impolite, humiliating or intimidating is an objective test, based on whether a reasonable person would have anticipated that the behavior would have this effect. This action can take place between the employer/supervisor and an employee (vertical relationship), between employee and employee (horizontal relationship), between an employer and subcontract or outsourced worker and between employees and service providers, clients or third parties. Unwanted conduct that is done repeatedly or continuously or a single incident may be identified as a sexual harassment.

FORMS OF SEXUAL HARASSMENT

Sexual harassment can take various forms. Broadly, there are five forms of sexual harassment:

- Physical harassment** includes unwelcome touching in a sexual manner such as kissing, patting, and pinching, glancing or staring full of lust;
- Verbal harassment** includes unwelcome comments about private life or body part or person's appearance, sexually suggestive jokes and comments;

COMPANY:

ANTOLIN

COUNTRY:

ALL

iii. **Gestural harassment** includes sexually suggestive body language and/or gestures, repeated winks, obscene gestures with fingers or lips;

iv. **Written or graphic harassment** includes display of pornographic materials, sexually explicit pictures, screen savers or posters, or harassment via emails and other modes of electronic communication;

v. **Psychological/emotional sexual harassment** consists of persistent proposals and unwelcome requests, unwanted invitations to go out on dates, insults, taunts or hints of a sexual nature.

HARASSMENT OCCUR WHEN

- i. The conduct has the effect of creating an intimidating, hostile or offensive work environment;
- ii. In a '**quid-pro-quo**' situation or "sexual blackmail", when an employer, supervisor, member of management or co-employee undertakes or attempts to influence the process of employment, terms or conditions of employment or other benefit of an employee or job applicant in exchange for sexual favors;
- iii. When such conduct is unacceptable for the victim and offensive, thus it is subjective from the perspective of the recipient.

WHAT IS NOT HARASSMENT?

Behaviors that are not considered harassment are those that arise from a relationship of mutual consent. So the key aspect of conduct that constitutes sexual harassment is the unwelcome nature of it. Sexual harassment does not refer to occasional compliments that are socially and culturally acceptable and appropriate. Disagreement on work performance or on other work-related issues is normally not considered harassment.

VII. SEX-BASED HARASSMENT OR DISCRIMINATION

WHAT IS SEX-BASED HARASSMENT OR DISCRIMINATION?

Gender-based discrimination involves treating someone unfavorably because of that person's sex or based on a person's gender, with the purpose or effect of undermining their dignity and creating an intimidating, degrading, humiliating or offensive environment.

Harassment does not have to be of a sexual nature, however, and can include offensive remarks about a person's sex.

HOW TO RECOGNIZE SEX-BASED HARASSMENT?

Some examples of conducts likely to be sex or gender-based harassment could include:

- Discriminatory behavior due to being a woman,
- Offensive ways of addressing the person,
- Ridicule, disdain the capacities, abilities and intellectual potential of women,
- Use sexist humor,
- Discrimination or unfavorable treatment of a woman due to pregnancy or maternity.

COMPANY:

ANTOLIN

COUNTRY:

ALL

Consideration of sex-based harassment requires a pattern of repetition and systematic accumulation of offensive conducts.

Gender-based harassment shall look the same as harassment based on sexual orientation, or homophobic bullying.

VIII. MORAL HARASSMENT

WHAT IS MORAL HARASSMENT?

"If a person or a group of individuals treats you in a manner that is hostile, whether through actions, words or in writing, and if those actions affect your dignity, your physical or psychological well-being, as well as causing a deterioration in your workplace or even jeopardizing your employment, you are the victim of psychological harassment."

HOW TO RECOGNIZE MORAL HARASSMENT?

Actions that are against the victim's possibilities to communicate (management gives you no possibility to communicate, you are silenced, verbal attack against you regarding work assignments, verbal threats, verbal activities in order to reject you, etc.).

Actions that are against the victim's possibilities to maintain social contacts (colleagues do not talk with you any longer or you are even forbidden by management to talk to them, you are isolated in a room far away from others, etc.).

Actions that are against the victim's reputation and dignity (gossiping about you, others ridicule you, others make fun about a handicap or your ethnic heritage, or your way of moving or talking, etc.).

Actions that are against the victim's occupational/employment situation (you are not given any work assignment at all, you are given meaningless work assignments, etc.).

Actions that are against victim's physical health (you are given dangerous work assignments, others threaten you physically or you are attacked physically, etc.).

Warning! There is no difference between "mobbing" and "bullying", or between moral harassment and psychological harassment. These terms are used to define the same phenomenon and depend on the country in which they originate from.

WHAT ARE THE CONSEQUENCES OF MORAL HARASSMENT AT WORK?

ON THE VICTIM: Moral harassment can lead to an untimely end to a professional career. The following example shows how such a course of events can lead to an abrupt, premature departure:

- i. Emotional instability: anguish, discouragement, frustration, feelings of helplessness, a loss of self-esteem, of ambition, of motivation;
- ii. Physical health problems: tiredness, headaches, lack of sleep, intestinal and other physical discomforts;
- iii. Mental health problems: depression, professional burn-out, suicidal thoughts;
- iv. Loss of credibility: reputation destroyed, victim's professionalism questioned;
- v. Job loss: disability leave, resignation or dismissal;

COMPANY:

ANTOLIN

COUNTRY:

ALL

- vi. Incapacity to go back to regular work: abandoning the job market.

THE COST OF HARASSMENT AT WORK

Moral harassment can have negative repercussions on the organization's performance, reputation and revenue. For example:

- Decreased enterprise productivity and competitiveness, due to: Absenteeism, impaired judgment, compromised team-work, lack of motivation.
- Damage to corporate culture and corporate image;
- Decrease in quality;
- Lawsuits;
- Loss of personnel: resignations, turnover, dismissals, work environment deterioration, no applicants.

In order to avoid cases of harassment, it is essential to put in place preventive measures that prevent its appearance. Among these:

IX. PREVENTING MEASURES

1.- Evaluation and prevention of psychosocial risks.

Prevention of inappropriate and unacceptable behaviors such as harassment behaviors should be raised in the context of general and proactive action to prevent psychosocial risks, in general. Different ways of organizing work and relationships between people can encourage or, on the contrary, avoid inappropriate situations or behaviors such as those at hand.

2.- Disclosure and training of Anti-Harassment Policy.

Effective knowledge of this Policy shall be ensured by all workers and at all levels of the Company. This dissemination will have an impact on management's commitment to ensure that in working environments dignity and freedom of working persons is respected.

3.- Accountability.

All employees have the responsibility to guarantee dignity and respect in the Workplace. Management staff should be particularly tasked with preventing any type of harassment under their organizational level.

X. ACTION PROCEDURE (COMPLAINT AND PROCESSING)

Even if appropriate preventive action takes place, behavioral or harassing situations may occasionally occur. Therefore, it is necessary to have a procedure or protocol to follow in cases where complaints or claims occur for this reason.

The procedure should be agile and prompt, giving it credibility, ensuring the protection of the right to privacy and confidentiality of the persons concerned, and preventing the harassed person from being forced to repeat the explanation of the facts, unless strictly necessary. The safety and health of the victim will also be protected.



ANTI-HARASSMENT POLICY

REVIEW No.	1
DATE:	March, 4 th 2021
PAGE	7 of 9

COMPANY:

ANTOLIN

COUNTRY:

ALL

The procedure shall be initiated with the submission of a complaint through the different channels enabled by the Company for this purpose: Whistleblowing Line through the website or intranet (BeOne), postal address or through the Compliance email address: compliance@antolin.com. All of them have the single and responsible recipient, the Compliance department.

The '**Whistleblowing Line or Transparency Channel**', is the channel enabled by the Company to direct claims via web or post office for any conduct or action contrary to the commitments and principles of the code of conduct, including all those related to harassment. The complainant may identify himself with his/her personal data when submitting the complaint, or do so anonymously.

If the person affected deem feasible to present it to a different person, he or she may do so to another person in charge of the Company (for example, the HR manager), who will automatically report and transfer the complaint in writing to the Compliance department. The complaint may be presented by the alleged victim or by other person who are aware of this incident.

The Compliance department has defined the principles and process for employees to report and scale non-compliance situations and incidents, creating a culture of transparency for incident escalation.

In this sense, the ordinary procedure in relation to the management of the whistleblowing line as well as those incidents that are escalated, has a number of basic points in relation to its preliminary analysis, processing, investigation and remediation.

The Compliance Department, depending on the implications and assumptions raised, must inform other Departments to discuss, act and resolve the incidents in the most appropriate way possible, respecting confidentiality and privacy in any case.

The Compliance Department will proceed to analyze and evaluate in preliminary any information it receives about the possible commission of harassed conduct or non-compliance described in the aforementioned cases, whatever its origin, always that it presents sufficient evidence of plausibility, seriousness, and nature of non-compliance or provides reasonable evidence of the existence. In this preliminary investigation process and in the subsequent additional investigation process, the Compliance Division may count on the collaboration of individuals who are fully independent of the complaint or complaint.

XI.- PROCEDURE OF INVESTIGATION

Following this preliminary analysis, the procedure may be archived together with the motivation to justify the corresponding file; or, be processed in case wherein it is considered that the reported facts or escalated incidents have sufficient holding which attracts non-compliance and determine its processing.

- a. Once it is determined, that the escalated fact or report should be processed and the internal investigation initiated, the Compliance Division shall appoint or designate a "Case Manager" (CM). The Case Manager is the responsible person in decision-making on research activities. It is also responsible for developing the research plan, under the supervision and support of the Compliance Division.
- b. If it is appreciated that the conflict can be resolved amicably, through the action of a mediator (Case Manager, Compliance Dept. or person designated for that purpose), it should be resolved in this way, and should be done to the fullest extent. If, however, the information collected leads to more evidence or facts of an serious harassment alleged case, a thorough and in-depth investigation will continue.

COMPANY:

ANTOLIN

COUNTRY:

ALL

- c. Based on the investigation, the Case Manager may ask for support from other professionals of the Company to carry out the necessary inquiries for the clarification of the facts under investigation (Investigation Team). All investigations may have, if necessary, the support of Regional or Local Legal Advisors, Human Resources, and the Compliance Department who will provide advice and guidance to ensure compliance with laws, regulations, agreements, applicable corporate policies, guidelines and practices. Also, if necessary, she/he can count on the collaboration of external advisors. To this end, the Compliance Department together with the Human Resources, and Legal Advice, in each case, will determine the scope of such collaboration, being able to delegate partially or total the investigation to the external advisors, which should keep you continuously informed during the course of the investigation.
- d. At the end of an investigation, the Case Manager, if required by the seriousness of the facts and remediation measures agrees or at the request of one of the parties involved, draws up with the assistance of the Compliance Department, and the Investigation final report that sets out all the concurrent circumstances resulting from the investigation, proposing the remediation measures to be taken (disciplinary correction, reporting to the authorities, improvements in the system or procedures to prevent similar situations in the future, among others), and refers it to the competent bodies to agree may impose the appropriate disciplinary proceeding.
- e. This final report will determine the result, which may be:
- Close the file or archive, because it is considered that the evidence is not conclusive, indicating whether or not the complaint was presented in good faith,
 - Proposal for sanctions or other disciplinary measures, which will be graded as a serious or very serious offence, taking into account all the circumstances, seriousness, intensity, repetition and impact of the facts.
- f. In the event of closing the file or archive, with an express declaration about the bad faith of the complaint, a disciplinary proceedings will be initiated against the person complainant.

In the event that after the investigation, the bodies or subjects competent for the conduct of the internal investigation conclude that no infringement or non-compliance has been committed, the Compliance Division responsible for the registration of archived investigations.

In the event of resolution with sanction, the result will be sent to the competent areas or bodies (HR) who may impose the appropriate disciplinary sanction. In the event that the sanction does not entail forced labor or dismissal, the Company will take the appropriate measures so that the aggressor and the victim do not stay in the same work environment.

In each case, the Compliance Division must keep a record of the documents, evidence, evidence that is part of the investigation process, as well as the cases and complaints processed and investigated internally.

It is a basic principle in Antolin, expressed in the Code of Conduct. Any retaliation or threats against those who make harassment complaints or assist in the investigation shall be subject to disciplinary measures. All allegations of retaliation brought by the Reporting Employee or other parties involved must be investigated.

The Compliance Division has the right to maintain the confidentiality of documents until they are disclosed for remediation actions. The disclosure of data from the procedure will be considered a serious offense, regardless of any other type of legal measure that may be taken.



ANTI-HARASSMENT POLICY

REVIEW No.	1
DATE:	March, 4 th 2021
PAGE	9 of 9

COMPANY:

ANTOLIN

COUNTRY:

ALL

Human Resources is competent to agree and impose the sanctions proposed and agreed by the Case Manager, the Compliance Division and the persons involved in the internal investigation, following the internal investigation referred to in the above mentioned paragraph.

The monitoring of the implementation and enforcement of the proposed corrective measures shall be the responsibility of the designated person, with particular attention to be paid to the victims.

MANAGEMENT APPROVAL

DATE: March, 4th 2021

SIGNED: J.M. GARCELÁN