



# **PROTOCOL FOR THE PREVENTION OF WORKPLACE, SEXUAL AND GENDER – BASED HARASSMENT**



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## 01. DECLARATION OF PRINCIPLES

The Spanish Constitution declares that the dignity of the person constitutes one of the foundations of political order and social peace, recognising the right of every person to non-discrimination, to equal treatment, to the free development of his or her personality and to his or her physical and moral integrity.

The Workers' Statute specifically provides for the right of all workers to respect for their privacy and the consideration due to their dignity, including protection against harassment on grounds of racial or ethnic origin, religion or belief, disability, age or sexual orientation, and against sexual harassment and harassment on grounds of sex.

The General Law on Social Security recognises harassment at work as an accident at work.

It is established that professionalism and integrity constitute guiding criteria for the conduct of SATELIOT professionals and enshrines the principles of non-discrimination, respect for personal and family life and the right to privacy.

In accordance with these principles, SATELIOT is committed to creating, maintaining and protecting a working environment where the dignity of the person and the rights and values referred to above are respected.

In order to ensure that all individuals enjoy a working environment in which their dignity, moral integrity and sexual freedom are respected and their health is not adversely affected, SATELIOT declares its commitment to promote an organisational culture that guarantees equal, respectful and dignified treatment of all its staff, rejecting any kind of harassment at work, sexual or gender-based harassment or other discrimination such as racial or ethnic origin, religion or beliefs, disability, age, sexual orientation or any other personal or social condition or circumstance, as well as any form of violence at work, both physical and psychological.

## 02. PURPOSE OF THIS PROTOCOL

This Protocol aims to prevent and eradicate situations constituting harassment, in all its forms, with the Company assuming its responsibility to eradicate an environment of conduct contrary to the dignity and values of the individual.

To this end, this Protocol considers two fundamental aspects: the prevention of harassment and the company's reaction to complaints of harassment. Consequently, two types of action are considered:



1. Establishment of measures by means of which SATELIOT seeks to prevent and avoid situations of harassment or situations that could constitute harassment.
2. Establishment of an internal procedure of action for cases in which, despite trying to prevent such situations, an internal complaint or report of harassment is made by an employee.

### 03. SCOPE OF APPLICATION

The protocol will be applicable to all company employees, regardless of their employment relationship with the company.

It will be applicable to teleworking, thus preventing situations of isolation or digital harassment at work as a psychosocial risk.

This protocol will also apply to personnel belonging to companies contracted by SATELIOT, as long as they carry out their activity in work centres depending on SATELIOT and in all those points referring to research.

### 04. EXCLUSIONS

The concept of harassment at work excludes those interpersonal conflicts that are temporary and localised at a specific moment, which may occur within the framework of work relations and which affect their organisation and development, but which do not have the purpose of personally or professionally harming one of the parties involved in the conflict.

In these cases, the competent bodies must undertake to clarify and resolve these conducts, in order to prevent these specific events or conflicts from becoming habitual and leading to harassment at work.

### 05. PREVENTIVE MEASURES

In accordance with article 46.2 of our labour agreement and with the aim of preventing harassment or situations potentially constituting harassment, the Company establishes the following measures:

1. The Company will promote an environment of respect and correctness in the work environment, inculcating in all workers the values of equal treatment, respect, dignity and free development of personality.
2. The Company will seek the integration of new employees, avoiding situations of isolation by monitoring the worker not only during the initial reception process, but also



afterwards. The Company will take into account the personal or cultural circumstances of the new employee and will take them into account in order to contribute to his or her integration.

3. The Company will provide information and training to workers on the principles and values that must be respected in the company and on the conduct that is not permitted.
4. The company prohibits insinuations or statements that are contrary to the principles outlined above, both in language, communications and attitudes.
5. When unacceptable conduct is detected in a specific group or work team, the Company's management will immediately contact the person responsible for this, in order to inform him/her of the situation detected, the obligations that must be respected and the consequences that derive from non-compliance, holding the appropriate meetings, if necessary, to analyse what happened and normalise behaviors.
6. The Company will maintain a constant activity in the adoption of new measures or improvement of the existing ones, which allow to reach an optimal coexistence at work, safeguarding the rights of all its workers.
7. Employees will be able to use the company's Communication Channel to report any situation of harassment at work (with this specific option within the Channel) in which they believe they find themselves, or which they may have perceived with respect to third parties.

## 06. HARASSMENT AT WORK

Workplace harassment in the company is the repetition of conduct, practices or behaviours, carried out individually or in a group, that violate the dignity of one or more professionals, creating a stressful, intimidating, humiliating or offensive environment, and whose purpose is that they end up leaving their job; the impairment or injury of the personality, dignity or psychological stability of the victim or victims.

The objective elements that make up the conduct of harassment at work are those of Systematicity, Reiteration and Frequency.

The subjective elements inherent to workplace harassment conduct are Intentionality and Pursuit of an end.

Harassment at work can be of different types:

1. Top-down harassment: The harasser is in a higher position than the victim.
2. Horizontal harassment: It occurs between people at the same hierarchical level.



3. Ascending harassment: The harassing person occupies a lower hierarchical level than the victim.

### 06.1. Characteristics

Here are a number of specific behaviours that could constitute harassment at work and, therefore, moral and psychological harassment::

Attacks with organisational measures:

- Forcing someone to perform tasks against their conscience.
- Judging the person's performance in an offensive way, hiding their efforts and abilities.
- Questioning and overruling the person's decisions.
- Not assigning any task or assigning meaningless or demeaning tasks.
- Denying or concealing the means to do the job or providing wrong information.
- Assigning work that is far beyond the person's competence or qualifications, or that requires far less qualification than the person possesses.
- Contradictory or impossible orders.
- Tampering with work tools
- Theft of belongings, documents, work tools, etc.
- Threatening or pressuring people who support the harassed.
- Manipulation, concealment, return of correspondence, calls, messages, etc. of the person.
- Denial or difficulties in accessing permits, courses, activities, etc. persona.

Attacks to reduce the possibilities for effort and communication:

- Change the location of the person by separating them from their peers (isolation).
- Ignoring the person's presence.
- Not speaking to the person.
- Restricting peers from talking to the person.
- Not allowing the person to express him/herself.
- Avoid all eye contact.
- Eliminate or restrict the means of communication available to the person (telephone, email, etc.).

Attacks affecting the physical or psychological health of the victim:

- Threats and physical aggression.



- Verbal or written threats.
- Shouting or insults.
- Frightening phone calls.
- Provoking the person, forcing them to react emotionally.
- Damaging the person's workplace or belongings.
- Requiring the person to carry out work that is dangerous or harmful to their health.

Attacks on privacy and personal or professional reputation:

- Manipulating personal or professional reputation through rumour, denigration and ridicule.
- Implying that the person has psychological problems, trying to get them to undergo a psychiatric examination or diagnosis.
- Making fun of gestures, voice, physical appearance, disabilities, name-calling, etc.
- Criticism of nationality, political or religious attitudes and beliefs, private life, etc.

## 07. SEXUAL HARASSMENT AND GENDER-BASED HARASSMENT

Article 7 of Organic Law 3/2007 of 22 March 2007 on effective equality between women and men defines:

1. Without prejudice to the provisions of the Criminal Code, for the purposes of this Law any behaviour, verbal or physical, of a sexual nature that has the purpose or produces the effect of violating the dignity of a person, in particular when an intimidating, degrading or offensive environment is created, constitutes sexual harassment.
2. Harassment on grounds of sex constitutes any conduct carried out on the basis of sex with the purpose or effect of violating the dignity of a person and of creating an intimidating, degrading or offensive environment.
3. Sexual harassment and harassment based on sex shall in any case be deemed to be discriminatory.
4. The conditioning of a right or an expectation of a right on the acceptance of a situation which constitutes (by reason of work or by taking advantage of a position of superiority) sexual or harassment on grounds of sex will also be deemed to constitute discrimination on grounds of sex.



Harassment on grounds of sex will also include insinuations or manifestations of homophobia or LGBTIphobia.

Any adverse treatment or adverse effect on a person as a result of a complaint, grievance, denunciation, claim or appeal, of any kind, made by that person with a view to preventing discrimination and demanding effective compliance with the principle of equal treatment between women and men.

By way of example, and without excluding or limiting, the following conduct is listed:

- Suggestive remarks, jokes, or comments about the appearance or sexual condition of the worker.
- The use of sexually explicit graphics, cartoons, drawings, photographs or images from the Internet.
- Offensive or sexually explicit telephone calls, letters or e-mails.
- Deliberate and unsolicited physical contact, or excessive or unnecessary physical contact.
- Persistent invitations to participate in playful social activities, even though the target has made it clear that they are unwanted and unwelcome.
- Any other behavior that has as its cause or aim the discrimination, abuse, humiliation or humiliation of the employee on the basis of his or her sexual status. Sexual harassment is distinguished from freely accepted and reciprocal approaches insofar as they are unwanted by the person who is the object of them. A single unwanted episode may constitute sexual harassment.





## 08. PROCEDURE FOR ACTION

SATELIOT's management guarantees the activation of the internal procedure of actions when the existence of harassment or facts that could be considered harassment is reported.

The procedure for reporting harassment begins with formal communication through our Whistleblowing Channel, which is accessed via Sateliot's official website. The communication made through the Channel is received by the Compliance Committee, which will initiate the corresponding investigation.

The request may come from:

- From the person concerned.
- From a co-worker.
- From company management and area leaders.

In the investigation phase, if the communication does not come directly from the person concerned, it will be brought to his or her attention in order to obtain his or her consent. Communications may be identified or anonymous. In the case of anonymous communications, it should be borne in mind that if all the necessary information is not provided, and as there is no way of requesting more information from the person making the complaint, the investigation may not be properly completed and, where appropriate, archived. Communications in which the person concerned does not give his or her consent cannot be processed.

### 08.1. Guiding procedural principles, procedural safeguards

- Respect and Confidentiality: it is necessary to proceed with the necessary discretion to protect the privacy and dignity of the persons concerned. The persons involved in the procedure have the obligation to maintain strict confidentiality and secrecy at all times.
- Application of time limits: the investigation and resolution of the reported conduct must be carried out in the shortest possible time, with rigour and speed, avoiding unnecessary delays.
- Protection of victims and restitution of their working conditions, if they are affected in the process.
- Protection of health: relevant measures should be taken to ensure the health of all persons affected.
- Prohibition of retaliation: retaliation against persons making a complaint, appearing as a witness or participating in a harassment investigation is expressly prohibited, provided that they have acted in good faith.



- Impartiality: the procedure must ensure a fair hearing and fair treatment for all persons concerned. All persons involved in the procedure shall act for the clarification of the facts complained of.
- Equal treatment: Absence of any difference in treatment of all persons involved in the procedure, whatever their status or personal or social circumstances.
- Professional and exhaustive investigation of the alleged fact.
- Adoption of measures of all kinds, including disciplinary measures, where appropriate, against the person/s whose harassment is proven. Likewise, any false accusation, accusation or complaint in relation to these behaviours is considered reprehensible and deserving of reproach, and the necessary measures will be adopted.
- Respect for the principle of presumption of innocence.
- All communications to the members of the committee shall be made in accordance with the principles established in the Data Protection Act and its implementing regulations.

### 08.2. The Compliance Committee as an investigative body

The investigative committee will be composed of the members of the Compliance Committee, whose members are:

1. Carlos Riopedre Saura – Managing Director / COO
2. Gloria Garcia Capdevila - Executive Assistant
3. Àngels Herrero Canal – HR Specialist
4. Alternate: Elisabet Fonalleras Nadal – Regulatory Manager

In the event that a member of the Committee cannot be an objective member due to a conflict of interest with the parties to the communication, the management of the company shall be notified in order to request and effect his or her replacement.

### 08.3. Initial Assessment

At this stage, it is the Compliance Committee that will initiate the investigation in order to decide whether or not to admit the harassment complaint, for which it will have a maximum of 10 working days to do so. Three situations may occur:

- The Compliance Committee objectively observes through proven evidence that there is a situation of harassment at work. It shall draw up a report and proposed resolution addressed to the company's management to request the opening of disciplinary proceedings on the basis of the provisions of the Collective Bargaining Agreement.



- The Compliance Committee needs to investigate the case further, as the situation cannot be considered harassment at the moment, even though there are indications of it.
- The Compliance Committee does not see any indication of harassment and before closing the procedure it may request consultation and evaluation of the External and/or Mutual Prevention Service.
- The results will also be communicated anonymously to the Equality Committee and the ORP area, so that the appropriate preventive or corrective measures can be implemented.

#### 08.4. Investigation process

- The Compliance Committee may propose, during the processing of the case and as a precautionary measure, in view of the seriousness of the conduct reported and the appearance of veracity of the evidence provided, the separation of the persons involved, without detriment to their working conditions.
- The investigation process will be carried out with the utmost speed, confidentiality, secrecy and participation of the persons involved.
- During the procedure, the persons concerned can make allegations and provide documents or other evidence, which will be taken into account by the Committee when issuing the corresponding proposal.
- Both the complainant and the person complained of will be able to be accompanied during the interviews, if they so request, by a person of their choice, and they will have the right to know the content of the statement of the other party, of the witnesses and of the documentation contained in the file.
- The complaint shall be considered false when, at the end of the investigation of the proceedings, it is established that the complaint lacks plausibility and that its purpose is to threaten or harm the person who has been denounced, it shall be considered a very serious misdemeanour and shall be subject to a corresponding sanctioning action.

The following guidelines shall be observed in the taking of evidence, in which the parties and witnesses shall be heard under the principle of neutrality in intervention:

- Introduction of the interviewer, explaining the process to be followed and the limits of confidentiality.
- Signing of informed consent at the beginning of the process.
- Try to reduce or minimise emotional tension, showing empathy, but without identification with any of the parties.



- Listen to questions about the process and make any necessary clarifications.
- Analyse the story and the experiences presented.
- Clarify neutral or general answers, such as "normal", "as usual", "I am not informed".
- Identify the positions of each party and their interests.
- Summarise the story in chronological order.
- Never use real situations from other cases that may have been investigated as examples.
- Interviews should begin with the complainant and the witnesses proposed by the complainant, continuing with the respondent and, where appropriate, the witnesses proposed by the respondent.
- It is considered that the harassing actions or behaviours must meet temporal criteria of frequency and/or duration: they must occur repeatedly, excluding isolated events, such as occasional conflicts between employees, which, although constituting a psychosocial risk, would not meet the definition of harassment.
- Emails, calls and messages saved by the complainant will be taken into account, as well as video recordings in which the harassed person participates and in a work environment (otherwise it would be illegal).

#### **Issuance of the complaint report and Resolution**

- The Compliance Committee shall have a maximum period of fifteen working days from the date of its first meeting, in which it shall issue a report of conclusions (in accordance with the attached model of this protocol) and, consequently, the resolution obtained by simple majority (obtaining the highest number of votes), signed by all members.
- The Compliance Committee shall have a period of five working days from the resolution to apply the measures established and notify the affected persons.
- If no situations of harassment are found, or it is not possible to verify the facts, the file shall be closed.
- If, as a result of the investigation carried out, the existence of harassment is not established, but it becomes clear that there is a relevant personal conflict generated by the work, the Compliance Committee shall propose the adoption of the appropriate measures to resolve the aforementioned conflict.
- The results shall be communicated to the Management and anonymously to the Equality Committee and the ORP area, so that the appropriate preventive or corrective measures can be implemented.



### **Corrective Measures**

If harassment is found to have occurred, the following measures may be proposed:

- Psychological and social support for the harassed worker.
- Modification of those working conditions that, with the prior consent of the harassed worker, are deemed beneficial for their recovery.
- Adoption of monitoring and surveillance measures for the protection of the harassed worker, the report of which will be issued by the Compliance Committee.
- Reiteration of the Company's ethical and moral standards.

### **Punitive Actions**

The sanctioning actions included in our protocol refer to those included in the applicable collective bargaining agreement.

### **Publicity and entry into force**

The content of this Protocol is mandatory for all staff of SATELIOT, and its content shall enter into force as soon as it is communicated to the staff of the Entity.

It shall remain in force until such time as it is modified or replaced by another.

The Protocol in force shall be available to all staff at all times.