




CIE Automotive


Protocol for the prevention and handling
of situations of harassment

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1. Introduction

With the intention of identifying, evaluating and proposing solutions for personal relationships in the workplace that may lead to the appearance of psychosocial pathologies, we have formalised the Protocol for the prevention and handling of situations of harassment.

2. Purpose and scope of application

This protocol aims to prevent harassment from occurring in the workplace and, if it does occur, to ensure that appropriate procedures are in place to deal with the problem and prevent its recurrence. These measures are intended to ensure a harassment-free working environment, where everyone respects the dignity of their colleagues, both professionally and personally.

The scope of application of this protocol is CIE Automotive, S.A. and the companies in which it has interests¹ ("**CIE Automotive**", the "**Group**" or the "**Company**"). Plants that have their own protocol in this area may apply their own specific protocol, but will ensure that such protocol is consistent with the minimum measures and procedures set out in this corporate protocol.

3. Definitions

a) Moral harassment (bullying):

This is understood as any abusive conduct or psychological violence that is carried out over a prolonged period of time against a person in the workplace, manifested through repeated behaviours, actions, orders or words that are intended to discredit, disregard or isolate a person with the aim of achieving self-abandonment of work, producing progressive and continuous harm to their dignity or psychological integrity.

It is considered an aggravating circumstance if the person carrying out the harassment has some form of hierarchical authority in the company structure over the alleged victim.

Moral harassment can take three forms:


- ✓ Top-down, when the harasser is in a higher position than the alleged victim of harassment.
- ✓ Horizontal, when it occurs between people at the same hierarchical level, with the harasser normally seeking to hinder the work of the victim in order to damage their professional image and even to take credit for their successes.
- ✓ Bottom-up, when the harasser is a person who occupies a position lower in the hierarchy than the alleged victim.

By way of example, among the passive or active behaviours which, alone or in combination with others, could constitute moral harassment, the following are highlighted, provided that they occur systematically and recurrently:

- Being ignored, excluded or shunned.
- Having one's work evaluated unequally or in a biased way, criticising their work in a derogatory manner.
- Being left without any work to do, even on one's own initiative, or being assigned tasks or jobs that are absurd, impossible or meaningless.
- Being given an unbearable workload in a manner that is manifestly malicious or endangers one's physical integrity or health.
- Receiving verbal abuse, insults, shouting.

¹ Companies in which it directly or indirectly holds more than 50% of the capital stock and/or has obtained the appointment of more than half of the members of its management body.

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- Receiving criticism and reproaches for anything one does or any decision one makes in their work.
- Having one's decisions systematically questioned or contested.
- Being humiliated or belittled publicly in front of colleagues or other people.
- Having one's private life mocked.
- Being the subject of orchestrated gossip and rumours.
- Having one's gestures, posture or voice imitated, or being assigned nicknames with the aim of ridiculing them.
- Having one's work unfairly monitored, logged and recorded for malicious purposes.
- Being denied opportunities for professional development.
- Being isolated and moved away from one's colleagues.

As such, conduct involving a personal conflict of a temporary nature at a specific moment in time, occurring within the context of human relations, will not be considered as moral harassment, although it may clearly affect the workplace, occur within the work environment, and influence the organisation and the employment relationship, as it is not part of a malicious, systematic and sustained attack on a person over time.

b) Sexual harassment:

Sexual harassment is defined as any verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, in particular when it creates an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual harassment at work does not need to take place over a prolonged period of time. A single action, because of its seriousness, may constitute sexual harassment.


Thus, specific behaviours can be identified which, by way of example, constitute sexual harassment:

- Upsetting, humiliating, sexually explicit or implicit insinuations and comments.
- Obscene remarks or jokes, direct or indirect propositions of a sexual nature.
- Letters, notes or e-mails with sexual content that propose, incite or pressure someone to have sexual relations, or that, without pursuing such an objective, simply offend or intimidate the recipient.
- Insistence on derogatory or offensive comments, of a sexual nature, about the appearance and image of any person.
- Touching, obscene gestures, unnecessary physical contact.
- Any sexual assault.
- Participating in the creation of a work environment that constitutes what is known in case law as "environmental sexual harassment", understood as physical or verbal behaviour manifested in acts, gestures or words, which is perceived as unwanted and undesirable by the person to whom it is directed, and which, although not directly aimed at soliciting favours of a sexual nature, is capable of creating a hateful and unpleasant atmosphere, through, for example, the repetition of comments or jokes of a lewd nature or with constant and unnecessary references to sexuality.
- The conditioning of a right or expectation of a right on the acceptance of a situation constituting sexual harassment.

c) Discriminatory harassment:

✓ Discriminatory harassment on grounds of sex

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A situation in which behaviour is produced, related to a person's sex, with the purpose or effect of undermining the dignity of the person, and creating an intimidating, hostile, degrading, humiliating, or offensive environment.

✓ **Discriminatory harassment based on sexual orientation, gender identity, gender expression or sex characteristics**

Discriminatory harassment is defined as any conduct carried out on the basis of sexual orientation, gender identity, gender expression or sexual characteristics, with the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive environment.

The following grounds of discrimination are defined:

- Sexual orientation: physical, sexual or affective attraction to a person.
- Sexual identity: the internal and individual experience of gender as each person feels and defines themselves, which may or may not correspond to the sex assigned at birth.
- Gender expression: each person's manifestation of their sexual identity.

By way of example, the following is a non-exhaustive list of specific behaviours which, fulfilling the requirements set out in the previous point, could constitute harassment of LGBTIQ+ people if they occur repeatedly, expressly including, but not limited to, trans people:

- Use of demeaning and offensive language to address LGBTIQ+ workers.
- Teasing or comments that ridicule LGTBIQ+ workers.
- Ridiculing and belittling the abilities, skills and intellectual potential of LGTBIQ+ workers.
- Unfair or biased assessment of people's work on the basis of their sexual orientation, gender identity, gender expression or sexual characteristics.
- Assignment of tasks or jobs below the person's professional capacity or competencies on the basis of sexual orientation, gender identity, gender expression or sexual characteristics.
- Generally speaking, unfavourable treatment based on sexual orientation, gender identity, gender expression or sexual characteristics


✓ **Harassment on other discriminatory grounds**

Discriminatory harassment is defined as any conduct carried out with the purpose or effect of violating the dignity of persons by creating an intimidating, hostile, degrading, humiliating or offensive environment, when it is carried out on the grounds of birth, racial or ethnic origin, religion or belief, disability, age, illness or health condition, serological status and/or genetic predisposition to suffering pathologies and disorders, language or socio-economic status, when it occurs within the business environment, both physical and digital.

Conduct constituting harassment on other discriminatory grounds includes, but is not limited to, the following:

- Organisational measures implemented in any of the circumstances enumerated above, with degrading purposes (exclusion, isolation, inequitable evaluation of unemployment, assignment of degrading tasks).
- Violence of any kind towards persons in any of the circumstances enumerated above.
- Behaviour, conduct or practices that are taken in the above circumstances, whether explicitly or implicitly, and that have an effect on employment or working conditions.

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- Ridiculing people because the tasks they agree do not conform to their culturally or socially imposed role or stereotype.
- Criticism, jokes, or mockery that ridicule one's racial or ethnic origin, religion or belief, disability, nationality, age or sexual orientation, gender identity or expression, or any other personal or social condition or circumstance.
- Denigrating people's work and intellectual capacity based on the circumstances listed above.

d) Acts of violence at work:

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

- Physical violence: physical violence should be understood as behaviour involving physical aggression in the workplace.
- Psychological violence: conduct involving psychological aggression between workers, generating hostility, etc., which may undermine the dignity and moral integrity of the person.

It is usually manifested verbally or in writing, but can also occur through mere gestures of contempt or actions of social rejection in relationships between colleagues (ignoring questions to a colleague, especially in public, overtly restricting communication, etc.).

Behaviours of psychological violence, if they occur recurrently or systematically, can amount to harassment (whether moral harassment or discriminatory harassment).

If these acts of psychological violence are carried out on the basis of any of the causes of discrimination prohibited by law, such as sex, racial or ethnic origin, religion, belief, etc., they would also become discriminatory acts, an aggravating circumstance that is also considered in this protocol.


Thus, specific behaviours can be identified which, by way of example, may constitute acts of violence with or without a discriminatory intent:

- Shouting or insults from one worker to another, alone or in a group.
- Established 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 of a personal nature.
- Verbally addressing or sending e-mails or communications that are particularly rude or abusive, or that imply intimidation or aggressiveness in content or manner, or that contain a libidinous aspect. In the latter case, depending on its severity or repetition, it 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 replies with poor manners, using a derogatory tone or with inappropriate, rude or unpleasant content, according to social standards.
- Physical aggression, fights, etc.

e) Cyberbullying

Any of the above forms of harassment can be carried out through information and communication technologies. Consequently, a situation of cyberbullying will be understood to exist when it is carried out through digital media by means of the recording, dissemination or publication of messages or images that affect the privacy or freedom of the victim in the workplace. As such, cyberbullying does not refer to an autonomous and independent form of

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harassment, but rather to the medium through which these conducts are carried out: the digital environment, with the added threat that this poses to the right to data protection.

4. Preventive measures

The following are established as preventive measures against harassment:

- ✓ Respect the principle of non-tolerance of such conduct, using, if necessary, the disciplinary measures provided for in applicable labour legislation.
- ✓ Establish the principle of shared responsibility among all workers in monitoring work-related behaviour.
- ✓ Define communication programmes that encourage communication and closeness at all levels of the organisation.

5. Ethics Channel

5.1 The Ethics Channel

The Ethics Channel includes all avenues available for the people mentioned in this document to communicate information legitimately obtained in the context of an employment or professional relationship, in relation to issues concerning gender equality and non-discrimination policies, as well as those that may constitute harassment according to the definitions contained in this document.

For matters not covered in this document, the provisions set out in the Ethics Channel Regulations will apply.

5.2 Who can use the Ethics Channel

All members, understood as all people who comprise the company, whether they are employees —whatever their status, including trainees—, shareholders, executives, or members of the Board of Directors, as well as applicants in hiring processes, trainees, retirees, etc., may submit information on alleged harassment.

External third parties such as suppliers, contractors and subcontractors may also use the Ethics Channel. They may report the breaches referred to above through the Ethics Channel and in full compliance with its requirements and procedures.

All individuals have the responsibility to build a work environment where behaviours constituting harassment are considered unacceptable and undesirable. As such, they are obliged to report any actions of which they become aware that could constitute harassment.


5.3 How to report possible harassment

Alleged breaches or queries may be submitted through the fully secure and confidential IT platform accessible on the Group's corporate website via the following link: <https://cieautomotive.com/canal-etico>

The platform to which the link provides access is available in all the languages of the countries in which CIE Automotive has a presence. To report an alleged infringement or query, you should click on the "Make a report" section and then answer the questions shown in the form.

The platform offers the option of transmitting the facts verbally, and the link itself provides answers to possible questions about the channel itself, how to present a communication or any other type of question in this area.

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Reports of suspected breaches and questions raised on the platform are automatically transmitted to the Chief Compliance Officer as Manager of the Internal Information System on a confidential or anonymous basis depending on the option chosen.

After submitting the form, you will be assigned a randomly generated case number. The reporting person will be able to access the platform's messaging system to find out the status of their report and communicate with the Chief Compliance Officer using the "case number" provided and the password created.

For security reasons and to preserve confidentiality, it will not be possible to recover the case number and password. Therefore, in case they forget, the reporting person will be required to start a new communication process through the platform.

Those who provide information in good faith about possible harassment will be protected against any retaliatory or discriminatory action by the organisation.

6. Procedure for action

6.1 Principles

We guarantee activation of the procedure described below when there is a complaint of harassment.

The following principles will govern the procedure and will be observed at all times:


- ✓ Guarantee of confidentiality and protection of the privacy and dignity of the persons involved, guaranteeing in all cases the preservation of the identity and personal circumstances of the person making the complaint.
- ✓ Priority and urgent processing.
- ✓ Thorough investigation of the facts, and if necessary, led by specialised professionals.
- ✓ Guarantee that action will be taken and the necessary measures adopted—including, where appropriate, those of a disciplinary nature—against the person or persons whose harassing conduct is proven, as well as in regard to anyone who in bad faith makes a false accusation or complaint.
- ✓ Indemnity against retaliation, guaranteeing that no adverse treatment or adverse effect on an individual will occur as a result of their making a complaint or representation in good faith aimed in any way at preventing harassment and initiating these proceedings (without prejudice to any disciplinary action that may be taken in situations of manifestly false reporting).
- ✓ Guarantee that the alleged victim can continue in their job under the same conditions if they so wish.

6.2 The initiation of the procedure

For all purposes, in all matters not provided for in this document, the communication of information and investigation of any alleged conduct or events that could be understood to constitute harassment will be governed by the procedure provided for in the document entitled Ethics Channel Regulations.

In order to adapt the strategy for investigation of the reported events to the existing recommendations on the investigation of situations that could constitute harassment, in any of its aspects, and/or violence in the workplace, any communication of information on these matters will be investigated by a committee.

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6.3 The committee

In the event that it is understood that the events reported may constitute harassment to some degree, the committee will initiate the corresponding investigation.

Each plant or production centre of the Group will have its own committee, which may be made up of:

- HR Director of the plant or production centre where the complaint is registered, or failing that, HR Director of the division or person designated by Senior Management.
- Occupational Risk Prevention Technician.
- Prevention Delegate, or failing that, the legal representative of the workers, or if there is no such representative or they are unable to take part in the process, the most senior person in service.

In addition, there is a corporate committee that will be in charge of supervising global compliance with this protocol, to be comprised of:

- HR Director or person designated by Senior Management.
- Chief Compliance Officer.

The plant or production centre committees are obliged to report all information relating to the investigation to the corporate committee.

In the event of absence due to holidays, illness, conflict of interest or any other legal cause, the person designated for this purpose in accordance with the procedures of each department or function forming part of both committees will act as substitute.

Resolutions will be passed by one-half plus one of its members.

The competences of the committees will be:

- To carry out the investigation of the reported events, preparing any documentary evidence or interviews that may be necessary and guaranteeing, in all cases, the strictest confidentiality of the matter and of the persons involved.
- To request appearance before the committee of other persons deemed to be of interest or deemed able to contribute to a better analysis and resolution of the issues raised. These appearing persons will have the right to speak but not to vote.
- To prepare a detailed report containing a conclusion of the events reported and investigated, as well as the measures proposed by the committee.

a) Initiation of the procedure

The committee will be responsible for initiating the investigation. When the Chief Compliance Officer receives a report of harassment through the Ethics Channel, following a preliminary analysis, they will refer it to the appropriate committee for investigation.


The persons involved in the investigation are bound by the obligation of professional secrecy with regard to the information to which they have access in the course of the investigation. Failure to comply with this obligation may result in penalties.

b) Informal procedure

This phase is optional for the parties and will depend on the will expressed by the victim.

The committee will initiate a confidential and rapid procedure to confirm the veracity of the communication, and to this end may request statements from anyone it deems necessary or obtain any documentation it deems appropriate.

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Once it has confirmed that there are indications that the information submitted concerning an alleged harassment situation is true, the committee will confidentially contact the person alleged to have committed the reported harassment, alone or in the presence of the alleged victim, at the latter's choice, to inform them of the existence of the reported information concerning their harassing conduct which, if true and repeated or persisting over time, could lead to disciplinary consequences or penalties. At this meeting, the alleged perpetrator may offer any explanations they deem appropriate.

The aim of the informal procedure will be to resolve the situation informally, seeking a solution to the problem and inquiring into it by creating a climate of communication and understanding between the parties involved, with a view to finding a negotiated solution and preventing this type of situation from escalating into harassment.

As such, the informal procedure will conclude with (i) the declaration of non-existence of harassment, (ii) when the person who feels harassed and the person who is the subject of the communication identify and analyse the action, with the latter committing not to repeat it, (iii) the committee proposing certain actions to resolve the case and both parties showing their agreement and conformity.

Once the case is initiated, and in the event it has not resolved the harassment problem within fifteen calendar days of its initiation, it will necessarily lead to the opening of formal proceedings. This period may be extended in the event of exceptional circumstances (e.g., coincidence with a holiday period, etc.).

c) Formal procedure

The formal procedure will be initiated either because (i) the outcome of the informal method has not been as expected, (ii) the committee has assessed the conduct during the informal procedure as serious or very serious, in which case the committee will directly escalate to the formal method, or (iii) those who consider themselves the victim of harassment may resort to this method without resorting to the informal method, if they so wish to, by stating it in the communication made through the Ethics Channel or at any other time.

The committee will meet no later than 7 working days after receipt of the communication or commencement of the formal phase, following the completion of the informal phase, as the case may be. This period may be extended in the event of exceptional circumstances (e.g., coincidence with a holiday period, etc.).

Investigation phase:

During the investigation, as many proceedings as deemed necessary for the clarification of the reported events may be conducted, while maintaining the formality of providing the parties involved with a hearing.


This includes, for example:

- Testimonies of people affected and involved and of witnesses.
- Written declarations.
- Reports from specialists who have treated the person concerned (in this case, the express written authorisation of the person concerned will be requested).
- Any other evidence that provides useful information to the process.

The committee may, if deemed necessary, seek external legal advice.

Unless there are exceptional circumstances (e.g., coincidence of holiday period, etc.), the investigation phase will commence no more than 10 working days from the submission of the

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communication or the start of the formal phase, following the completion of the informal phase, as the case may be.

Submitting a Report

The report will contain the following information, at minimum:

- Background information on the case.
- Facts that have been established following investigation.
- Summary of the proceedings and evidence.
- Conclusions and, where appropriate, proposed measures to remedy the problem and to determine, where appropriate, any disciplinary action that may be taken. The proposed solutions must be taken unanimously to ensure the implementation of the solutions.

In any case, it must state whether or not the investigating party is convinced that the alleged acts were in fact committed, explaining the facts that have been objectively proven based on the proceedings carried out.

The committee will issue a detailed report no later than 10 working days from completion of the investigation phase.

The duration of the investigation including the issuing of the report will be no more than three months, such term which can be extended for a further three months based on the complexity of the case and/or exceptional circumstances.

The report will be forwarded to the company's corporate committee, which will proceed to take and implement decisions in view of the report's contents.

d) Interim measures

During the processing of the case, at the committee's recommendation, the plant's HR Management may take the necessary interim measures aimed at the immediate cessation of the harassment situation, without such measures entailing any prejudice to the working conditions of the persons involved.

e) Assistance to the parties

During the processing of the case, the parties involved may be assisted and accompanied by a trusted person, who will maintain confidentiality regarding the information to which they have access.

This trusted person may be present when declarations are taken and in the communications addressed by the investigating party to the persons involved.

f) Closing the case


The committee, taking into consideration the seriousness and importance of the facts which are proven, will adopt the necessary corrective measures and will also impose the disciplinary measures provided for in the applicable law and/or agreement.

In the event that it is determined that there is no harassment in any of its forms, and it is also determined that the information reported through the Ethics Channel was given in bad faith, the corresponding disciplinary measures will be applied.

7. Classification and sanctions

The finding of the existence of any type of harassment in accordance with the provisions of this protocol will give rise to the imposition of sanctions for very serious misconduct in

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accordance with the corresponding article of the collective bargaining agreement currently in force in the company or, failing that, with the applicable local legislation.

8. Validity of this protocol and dissemination

This protocol entered into force on the day of its approval by the Audit and Compliance Committee in February 2024.

It may be reviewed at any time during its term in order to adapt or reorient it in line with its effectiveness, CIE Automotive's evolution and/or legal or social changes.

This protocol will be available on the website for the knowledge of the entire organisation: [link](#)

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