

**PROTOCOL FOR THE
PREVENTION OF SEXUAL
HARASSMENT, BASED ON SEX
IN THE COMPANY AND
WORKPLACE HARASSMENT**

**AKCOAT RECUBRIMIENTOS
QUIMICOS ESPECIALIZADOS, S.L.U.**

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1. INTRODUCTION

AKCOAT RECUBRIMIENTOS QUIMICOS ESPECIALIZADOS S.L. (hereinafter, the "*Company*" or "*AKCOAT*") has approved this "Protocol for the prevention and approach of sexual harassment, based on sex and work in the Company" (hereinafter, the "*Protocol*"), with the commitment to define, avoid and detect situations of moral harassment, sexual harassment and harassment based on sex, or any other form or way of harassment that may occur, as these are situations that threaten the dignity of the person who receives them and be harmful to the work environment.

In this sense, the Company is committed to respect for people, legality, and Human Rights, which must prevail in any activity including that carried out by all people in their workplace. Therefore, relations between professionals require the observance of an adequate, respectful and dignified treatment.

Harassment, in any of its forms, goes against the Company's commitments mentioned above and has a detrimental effect on the person who receives it, as well as on the work environment. In this sense, the person who receives the harassment can be harmed in as many aspects as health, self-esteem, confidence and professional development. The Company cannot allow its workers to be affected by such behaviors, especially when they arise in the workplace, since it is the Company's commitment to preserve and monitor the health of all its personnel.

Likewise, through this Protocol the Company also wants to comply with current legislation. Thus, the Law on the Prevention of Occupational Risks obliges Companies to monitor and avoid occupational risks, as well as to minimize those that cannot be eliminated. In this sense, behaviors that can be framed as sexual harassment, due to sex or work are psychosocial risks on which the Company has the duty to act.

We also find the obligation to develop a Protocol for the prevention of harassment in Organic Law 3/2007, of March 22, for the effective equality of men and women. Thus, article 48.1 of the aforementioned norm establishes the obligation of companies to promote working conditions that avoid sexual and gender-based harassment, as well as to arbitrate specific procedures for its prevention, as well as to channel complaints or claims that may be made by those who have suffered this type of harassment.

That is why, in order to guarantee the protection of the Fundamental Rights of the person, and in a resounding commitment to comply with the regulations applicable to this effect, the Company has decided to adopt this Protocol to, on the one hand, expressly establish the mechanisms to articulate its commitment to the prevention of harassment and, on the other hand, comply with the legal provisions on this matter.

Due to the above, the Company assumes that harassment attitudes represent an attack on the dignity of workers, and are behaviors that are totally prohibited in AKCOAT, and are considered unacceptable in the organization, so it undertakes not to allow or tolerate harassment at work and to avoid and prosecute those behaviors that can be defined as harassment, committing in turn to make use of its managerial and disciplinary powers to sanction those behaviors that can be framed as harassment applying, where appropriate, a zero tolerance policy.

2. OBJECTIVES

The purpose of this Protocol is precisely to prevent harassment and seek its eradication by establishing a series of prevention measures and an action protocol with specific procedures depending on the type of harassment, in the event of a complaint, in a pragmatic and simple way, accessible to all workers, and with a clear vocation to avoid not only the modalities of harassment to whose prevention we are obliged by the Law on Equality (harassment based on sex and sexual harassment), but to all those that are incardinated within the phenomenon of harassment, namely: harassment based on sex, sexual harassment, harassment based on another discriminatory cause (such as on the basis of race, age, sexual orientation, etc.) and moral harassment, commonly known as "*mobbing*" (harassment that violates the right to physical and moral integrity and the right to dignity) not based on discriminatory cause.

An environment free of unwanted behavior, hostile and oppressive behavior is the responsibility of companies. Therefore, AKCOAT works to implement policies with clear standards and values at all levels of the organization that guarantee and maintain work environments free of harassment, where the dignity of every worker is respected and the development of people is facilitated.

For all these reasons, AKCOAT expresses its concern and commitment to maintain positive work environments, prevent and avoid harassing behaviors and pursue and solve those cases that occur in the workplace.

The purpose of this Protocol is to:

- a) **The Prevention of Harassment:** through the establishment of measures through which the Company seeks to prevent and avoid situations of harassment or situations likely to constitute harassment.
- b) **The effective business reaction to** complaints of harassment: establishing specific internal procedures of action for cases in which, while trying to prevent such situations, there is a complaint or internal complaint by an employee regarding an alleged scenario of harassment.

3. SCOPE

This Protocol shall apply to all workers of the undertaking, irrespective of their employment relationship with it (indefinite or temporary), and of the occupational group to which they belong.

Likewise, this protocol will be applicable to, where appropriate, people who can provide services in AKCOAT through Temporary Work Agencies (ETT).

Personnel belonging to companies contracted by AKCOAT, provided that they carry out their activity in work centers dependent on it, this protocol will also be applicable, in all those points related to research. The adoption of corrective measures will be done in a coordinated manner between the affected companies and the main company in accordance with the provisions of Article 24 of Law 31/95 on the Prevention of Occupational Risks, and the regulations that develop it.

For those who can collaborate with the Company, but who are not linked to it by an employment contract (for example, scholarship holders), this protocol will be of subsidiary application.

If the harassment occurs outside the Company's workplaces, but on the occasion of events or trips for work, it must be shown that the situation **is directly linked to work**.

4. DEFINITIONS AND CLASSIFICATION

For the purposes of this Protocol:

- 1. Sexual harassment:** any behaviour, verbal or physical, of a sexual nature that is unwanted on the part of the person subject to such behaviour and has the purpose or effect of attacking the dignity of a person, in particular when an intimidating, degrading or offensive environment is created, through inappropriate attitudes, statements or comments.

The action taken by the harasser must be unwanted and rejected by the sufferer. Therefore, if that action is accepted and consented to by the recipient, there would be no sexual harassment.

It is not necessary for sexual harassment actions at work to take place over an extended period of time. A single action, depending on its severity, may constitute sexual harassment.

Thus, specific behaviors can be identified that, by way of example and without exclusive or limiting spirit, constitute sexual harassment:

- Annoying, humiliating, sexually explicit or implicit insinuations and comments.
 - Proposals or pressures for sexual activity through proposals of a sexual nature, direct or indirect.
 - Repeated and unwanted proposals for participation in social events outside the workplace.
 - Letters, notes, e-mails, *Whatspps* or any type of message with sexual content that propose, incite or pressure to have sexual relations, or that, without pursuing said objective, simply offend or intimidate the recipient
 - Insistence on derogatory or offensive comments, of a sexual nature, about the appearance and image of the worker.
 - Touching, obscene gestures, unnecessary rubbing.
 - All sexual assault.
 - Participation in the creation of a work environment that constitutes what is known jurisprudentially as "environmental sexual harassment", understanding by such a physical or verbal behavior manifested in acts, gestures or words, behavior that is also perceived as unwanted and undesirable by the worker allegedly harassed or by the person receiving them, and that, although it is not directly aimed at the request for favors of a sexual nature, it is capable of creating a radically hateful and ungrateful climate, through, for example, the reiteration in comments or jokes of libidinous content or with constant and unnecessary references to sexuality.
 - Sexual harassment of exchange, this being the conditioning of a right or an expectation of right to the acceptance of a situation constituting sexual harassment, is to access employment, to maintain it or to improve the employment status achieved, being its rejection the basis for a negative decision for the taxpayer **-harassment pro quo-** ; not being included in this point sexual exchanges by mutual agreement that may lead to a difference in labor treatment either access to employment or improvement of the labor condition.
- 2. Harassment on the basis of sex:** behaviour carried out on the basis of a person's sex, with the purpose or effect of violating their dignity and creating an intimidating, degrading or offensive environment, as well as any adverse treatment or negative effect that occurs on a person as a result of the presentation by them of a complaint, complaint, complaint, demand or remedy, aimed at preventing discrimination and demanding effective compliance with the principle of equality between women and men.

Likewise, harassment based on sex will be considered the harassing conduct motivated by that worker who has exercised or intends to exercise rights derived from the assumption of family responsibilities such as maternity leave, paternity leave, reduction of working hours for child care, as well as the rest of the rights and leaves contemplated both in the Workers' Statute, State Collective Agreement for the trade of distributors of specialties and pharmaceutical products, and other legal provisions.

In order to safeguard the full effectiveness of this Protocol, any adverse treatment or negative effect that is generated against a person as a result of the presentation by a complaint, claim, complaint, demand or remedy, of any kind, aimed at preventing discrimination and demanding effective compliance with the principle of equal treatment between women and men, shall also constitute harassment on the basis of sex.

- 3. Workplace harassment or "mobbing":** any conduct, practice or behaviour, carried out systematically or recurrently and carried out for a long time within an employment relationship, which directly or indirectly involves an impairment or attack on the dignity of a worker, which is attempted to submit emotionally and psychologically in a violent or hostile way, and which seeks to nullify their capacity, professional promotion or their permanence in the job they occupy, negatively affecting the work environment.

Next, we proceed to classify the behaviors and processes of workplace harassment including examples of attitudes or behaviors that fit into each type:

a) Attacks with measures organizyoudo:

- The superior unjustifiably restricts the person's possibilities of speaking.
- Change without a justified reason the location of a person separating him from his peers with the will to isolate him.
- Prohibit colleagues from speaking to a certain person.
- Threats or pressure on people who support the harassed.
- Forcing someone to perform tasks against their conscience.
- Judge a person's performance offensively, hide their efforts and abilities.
- Questioning a person's decisions to belittle or expose them.
- Do not assign tasks to a person to harm their professional development.
- Assigning meaningless or under-capacity tasks to impair their professional development.
- Assign degrading tasks.
- Assign jobs far superior to the person's competences or qualifications.
- Contradictory or unenforceable orders.
- Deny or hide the means to perform the work, or provide erroneous data.
- Manipulating work tools (e.g. deleting computer files...)
- Theft of belongings, documents, work tools, among others.
- Manipulation, concealment, return of correspondence, calls, messages, among others.
- Denial or difficulties in accessing permits, courses, activities, among others.

b) Attacks to reduce the chances of communication:

- Restrict colleagues from talking to a person in the Company with the intention of isolating them.
- Refusing to communicate with a person through looks and gestures.
- Refusing to communicate with a person by not communicating directly with them.
- Do not speak to a person with the intention of isolating them.
- Treat a person as if they don't exist.
- Avoid all eye contact.
- Do not allow the person to express themselves.

- Eliminate or restrict the means of communication available to the person (telephone, email, and others).

c) Attacks affecting the physical or mental health of the victim:

- Permanent criticism of a person's private life.
- Scary phone calls.
- Making a person look stupid.
- Imply that a person you have psychological problems.
- Mocking a person's disabilities.
- Imitate gestures, voices... of a person.
- Mocking a person's private life.
- Sexual offers, sexual violence.
- Threats of physical violence.
- Use of minor violence.
- Physical abuse.
- Yelling or insulting.
- Permanent critiques of the person's work.
- Verbal threats.
- Provoke the person, forcing them to react emotionally.
- Requiring the person to perform work that is dangerous or harmful to their health.

d) Attacks on victim attitudes:

- Attacks on political attitudes and beliefs.
- Attacks on religious attitudes and beliefs.
- Mock the nationality of the victim.

e) Hearsay:

- Bad talking about the person behind your back.
- Spread of rumors.

The merely occasional manifestation of the behaviors described does not constitute, in itself, moral harassment.

However, if such behaviors occur systematically and also do so in a reasonably prolonged manner over time, they could lead, where appropriate, to a situation of moral harassment.

5. CHARACTERISTICS OF HARASSMENT AND THE WAYS OF EXERCISING IT

In order for a conduct to constitute any of the forms of harassment in any of the typologies detailed in the previous point, it will be necessary that the notes of continuity, severity and that they are directed against a specific person are given.

To determine compliance with these requirements, after informing the Management of the Company of a possible situation constituting any of the typologies of harassment, each alleged situation of harassment and the casuistry that has preceded it will be studied individually.

The importance of such a study focuses on not confusing a situation of harassment with a mere conflict, the latter

being that situation in which there is a discrepancy or a difference that originates in the workplace as a result of work, but where there are no notes of continuity or severity. Even occasionally there can be conflicts and heated discussions in the field of work without this having to be confused with harassment.

All of the types of harassment described above can be exercised in three distinct ways, and are:

- **Top-down:** when the harasser occupies a position of higher hierarchical level to the alleged victim of harassment.
- **Horizontally:** when the harasser is at the same hierarchical level as the alleged victim of harassment.
- **In an ascending way:** when the harasser occupies a position of lower hierarchical level than the alleged victim of harassment.

6. PREVENTIVE MEASURES

The preventive approach to these situations involves actions in different areas, all aimed at avoiding the emergence of conflict.

In order to prevent harassment or situations potentially constituting harassment, the Company undertakes to:

- Putting special care into the **organization of work** has proved to be one of the most effective measures to prevent these situations. The main aspects that we must consider, in this sense, are:
 - Perform a thorough risk assessment of all jobs.
 - Weigh, as far as possible, the workload and its distribution among the workforce.
 - Grant functions and responsibilities consistent with the job.
 - Ensure the suitability of the means provided to carry out the work.
 - Clearly define the objectives of the different Departments, as well as the tasks necessary to achieve them.
 - Any other action aimed at maintaining a good working environment and motivation for workers.

Some recommendations in this regard are:

- Encourage the holding of periodic Department meetings, in which workers actively participate and receive sufficient information about roles, responsibilities, changes, working methods, etc.
 - Maintain fluency in communication channels at all levels.
- **Disseminate and inform:** to prevent and avoid situations of harassment at work, the Protocol in force at all times will be disseminated through:
 - Corporate website of the Company.
 - Email to all members of the Company. Upon receipt of this Protocol, the worker must confirm his receipt and understanding of it by email sent to l.ruiz@akcoat.com. This is without prejudice to the fact that employees who expressly request it are provided with a physical copy, in which case, they will be required to sign the corresponding receipt that is included in this document as ANNEX II.
 - Information package delivered to new additions. New employees will be provided with an electronic copy of it, and must confirm its receipt and understanding by email sent to l.ruiz@akcoat.com. In the event that the worker expressly requires it, a physical copy will be provided and must sign the receipt of this included as ANNEX II.
 - Any other means that serves that purpose.
 - **Sensitize:** the Company undertakes to sensitize the staff both in the definitions of the different types of harassment and their manifestations, as well as in the procedure of action established in this Protocol to act in cases of harassment.

In this sense, the Company has the will that workers take an active part in the avoidance and denunciation of those cases that may be considered as harassment in any of its different typologies. Therefore, workers can, at any time, make suggestions in writing through the email address l.ruiz@akcoat.com, suggestions that the Company appreciates and undertakes to study.

- **Train:** the Management of the Company will provide specific training on sexual harassment, based on sex and work, to all workers who are part of any of the bodies described in this procedure, also, in a

second phase training will be provided to all those responsible for the different departments that have employees in their charge.

Likewise, specific training plans will be implemented that will be carried out electronically through the corporate portal for all employees of the Company, with the aim that workers are able to define and determine situations of harassment, as well as so that they know how to act and solve any cases of harassment before which they may be found, without prejudice to the fact that, through the email indicated in the previous section, specific queries or requests for training can be formulated.

The Company also undertakes to implement the following measures:

- (i) The Company will promote an atmosphere of respect and correctness in the work environment.
- (ii) To this end, it will instill in every worker, both those who join the workforce and those who are already part of it, the values of equal treatment, respect, dignity and free development of personality.
- (iii) The day-to-day of personal relations between workers will be based on an educated treatment, governed by good manners.
- (iv) The Company prohibits the use of obscene language, as well as offensive jokes or comments or sexist content, whatever the means of communication used.
- (v) The Company prohibits attitudes of insinuation or manifestations of a physical nature, gestures, looks, touching, intentional rubbing, etc.
- (vi) The Company will seek the integration of new access personnel, avoiding attitudes of isolation, through a follow-up of the worker incorporated not only in his initial reception process but after it.
- (vii) The Company will echo the personal or cultural circumstances of the incorporated worker and will take them into account to contribute to their integration by putting the means at their disposal through the management carried out in this regard by the Human Resources department.
- (viii) The Company will provide information and training to its employees on the principles and values to be respected in the Company, as well as the behaviors that are not tolerated.

If the Company detects that, even without a specific situation of harassment, any of the behaviors described in sections "iv" and "v" occur, making them manifest in a certain group, work team, Department, etc., it will immediately contact the person in charge of the department / s involved / s corresponding to:

- To remind you of the existence and validity of this Protocol and its content, in particular, non-tolerated conduct.
- Inform you about the extent of the possible violation of the Protocol.
- Demand that the cessation of such conduct be urged in order to prevent a possible future framework of harassment.

- Make yourself available to the person in charge and the rest of the workers to hold a meeting or a conversation about what happened, which helps to normalize the environment.
- In very serious cases, the Company may activate the action protocol directly without following the previous points that seek the avoidance of harassment situations.

All these measures and declarations constitute the business action in terms of prevention of situations likely to cause situations of harassment.

The Company, with these preventive measures, lays the foundations for optimal coexistence at work, safeguarding the fundamental rights of workers.

Finally, the Company undertakes to continue working on new measures to prevent harassment and to implement them in a timely manner, as well as to keep informed about the advances that occur in society in this regard.

7. PROCEDURE OF ACTION: SEXUAL AND GENDER-BASED HARASSMENT

Next, an internal procedure is established for action by the Company in situations in which a worker denounces the existence of sexual harassment or for reasons or facts likely to be considered as sexual harassment or because of sex.

7.1. Guiding principles of the present procedure

This procedure is an agile and fast procedure that, in a climate of trust, protects the privacy, confidentiality and dignity of the affected persons and seeks sufficient protection of the worker allegedly harassed in terms of their safety and health that aims to investigate, clarify and solve possible cases of harassment that may exist in the company.

To this end, the guiding principles of this procedure are:

- a) Proceed with the discretion necessary to protect the privacy, dignity and confidentiality of the persons concerned.
- b) Likewise, sufficient protection of the alleged victim will be sought in terms of his safety and health, taking into account the possible consequences, both physical and psychological, that may arise from the situation, paying special attention to the work circumstances in which the alleged victim finds himself.
- c) Do not disclose any information to parties not involved in the case, unless necessary for the investigation.
- d) Conduct the investigation without undue delay.
- e) Achieve a fair hearing and fair treatment for all those affected.
- f) Expressly prohibit any type of retaliation or negative effects as a result of the presentation of the complaint, complaint, claim, guaranteeing the indemnity of the people who denounce, except in bad faith in the presentation of the same.
- g) Seek the truth and the clarification of the events that occurred.
- h) Guarantee the responsibility and investigative power of the Instructor during the processing of the procedure.

7.2. Instructor body

An investigating body is designated as responsible for the processing of this procedure, which will be the same for the entire Company, including all the work centers that it has at any given time.

The main mission of the Investigating Body will be to promote, ex officio or at the request of a party, the processing of this internal procedure of action, in the event that it becomes aware of a situation potentially constituting harassment, as well as to provide support and help to the workers allegedly harassed, carry out the appropriate procedures and implement the relevant measures and procedures.

To this end, AKCOAT appoints an investigative and follow-up commission for cases of sexual and gender-based harassment consisting of:

- Instructor to Lidia Ruiz Cózar, who holds the position of BU Human Resources Section Manager

- in the Company,
- Incases in which it is exceptionally necessary for the development of its functions, it will rely on a collaborator, Raquel Amat Renau belonging to the Department of Finance.

These people are located in the Company's work center at Calle Ceuta nº 13, Polig. Industrial El Colomer, 12200 Onda (Castellon).

However, in the event that the Investigated party must be the Instructor or his collaborator, or affected by a relationship of kinship or affectivity, friendship or manifest enmity, of immediate superiority or hierarchical subordination, or by any other type of relationship with respect to the affected person or the person denounced, which may cast doubt on his objectivity and impartiality in the process, the Applicant or Third Party Applicant must address his Communication of Initiation of the Action Procedure to the Management of the company, specifically to Juan del Casar Ximénez. In this case, it will be the General Management of the company, who will determine the person who will exercise the functions of Instructor for that Action Procedure.

Likewise, any worker or person who feels harassed or who has knowledge of an alleged situation of harassment, but who prefers to keep their identity anonymous, may formalize the complaint through the suggestion box.

Therefore, the means of communication are:

- By email to the Instructor: l.ruiz@akcoat.com.
- By email to the Partner: r.amat@akcoat.com
- In person, either in writing or verbally, to the Instructor or Collaborator.
- Through the complaints channel established in the suggestion box.

Such communication shall initiate the procedure laid down in paragraph 7.4.

7.3. Preventive measures

In cases of complaint of harassment and until the procedure is closed, the AKCOAT Directorate may, at the proposal of the Investigating Body, adopt a precautionary measure in situations of special gravity or in situations in which the facts denounced come to constitute reliable indications of the existence of harassment.

In addition, the precautionary measures that, where appropriate, may be adopted must be reasonable and proportionate to the purpose that they are intended to achieve: mainly, to try to avoid that during the investigation new events occur that aggravate the situation, generating greater damage to the worker or workers allegedly harassed.

Non-substantial functional and geographical mobility are contemplated as possible precautionary measures in order to eradicate the situation of conflict and/or harassment that is being investigated.

7.4. Initiation of the procedure

The Procedure will be initiated by means of the Communication addressed to the Instructor or the Collaborator by the affected person (Applicant) or by a third party who has knowledge of the facts (Third Party Applicant). This letter may be submitted in person, by email to the address of the Instructor or Collaborator, as well as through the suggestion box.

In the event that the Communication is made by a Third Party Applicant, your privacy will be protected, so that only the Instructor can know your identity, without this data being able to be relayed to third parties in any case.

Attached to this Protocol is a model of "*Communication of initiation of the Procedure of Action*" (Annex I), made available to workers so that they can use it as a Communication form. However, the complainant is free to use the writing he deems appropriate to communicate the situations of possible harassment, including verbal communication to the Instructor or Collaborator, who will record such statements in order to start the procedure.

7.5. Preliminary

Once the procedure has begun, the Instructor will hold a meeting prior to the formal start of the procedure, either electronically or in person, with the affected person (Applicant) or with the third party with knowledge of the facts that has initiated the procedure (Third Applicant), if this is known.

This previous meeting aims to inform about the procedure, explain the steps to follow and refresh concepts in order to remember the training carried out and define the regime of obligations and responsibilities before a complaint of harassment at work.

After the conceptual presentation made by the Instructor, the person affected by a possible situation of harassment will express in writing his willingness to continue or not with the internal action procedure, despite the will to continue expressed by the Third Party applicant.

The minutes of the meeting that are signed must include as a minimum content, the clear and unequivocal will of the person allegedly affected by a situation of harassment and the recommendation, where appropriate, made by the Company or the Third Party Applicant.

If the person allegedly affected expresses his opposition to continuing with the procedure of action, it will end at this time, unless the Management of the Company has clear indications that harassment has occurred. In such cases, the Investigating Body will continue the investigation without involving the affected person taking the necessary preventive measures to prevent this situation from recurring.

This meeting must be held within a maximum period of three (3) business days from the receipt of the communication of the initiation of the procedure.

7.6. Development of the procedure (1): Hearing procedure

Once the Communication has been made to the Instructor and the previous phase established in the previous point has been carried out, the latter will open the hearing procedure within a maximum period of two (2) business days following the receipt of the Communication.

At the time of opening of this procedure, the Instructor will communicate in writing both to the Investigated and the Applicant:

- The facts contained in the communication document, which may include literal extracts and / or screenshots of the communication.
- The possibility of presenting as many pleadings as they deem appropriate during the hearing process, as well as the possibility of requesting meetings or interviews with the Instructor, which must be granted.

- If you wish to carry out a joint interview with the other party involved and directed by the Instructor, in order to reach an amicable agreement in this process.

In the event that both parties agree to conduct the joint interview, it must be conducted. The objective of this interview is to clarify the facts and reach an amicable solution between the parties, so the Instructor will meet with the affected parties with the aim of resolving the dispute. If the situation of harassment is solved in this interview, the procedure of action will end at this time, leaving a record of the solution reached by writing of which the person Investigated, the alleged victim and the Instructor will have a copy.

The hearing procedure will have a maximum duration of five (5) business days. Once this period has elapsed, or if, once the joint interview has been carried out, no amicable agreement has been reached, the procedure will continue through the Report Procedure.

7.7. Development of the procedure (2): Research

In order to guarantee the agility and speed of this procedure, it should not be delayed for more than ten (10) working days, unless, due to the complexity of the file, the Investigating Body decides to extend it, leaving a record of the reasons for the extension and the maximum period for which the procedure will be extended.

Through this procedure, the Instructor will carry out as many steps as he deems appropriate in order to clarify the facts denounced. Throughout this process, the possibility of the affected parties to present as many pleadings as they deem appropriate will persist, as well as the possibility of requesting meetings or interviews with the Instructor, which must be granted.

Thus, as an example of the possible steps to be practiced, the Instructor may:

- Conduct confidential questionnaires and interviews with the people you deem appropriate.
- Arrange hearings with the affected worker , the alleged harasser, the superiors and colleagues of the alleged harassed and with any person it deems necessary.
- Collect as much information as possible through the Company's documentation. The General Directorate and the person responsible for the persons involved will collaborate in the provision of all the documentation that the Investigating Body requires for the clarification of the facts.
- If it is essential for the clarification of the facts, adopt surveillance measures through detectives or computer, telematic or audiovisual means, provided that they meet criteria of reasonableness, suitability and proportionality, taking into account respect for the right to privacy of workers or any other fundamental right.
- Request external help (lawyers, psychologists or other professionals).
- Any other proceedings that the Investigating Body deems necessary for the clarification of the facts.

The intervention of witnesses and actors will be strictly confidential and their intervention will only be requested in those cases that due to the characteristics of the complaint so require and in no case suppose a prejudice to the complainant.

The accused will be summoned for a private interview in which he can make the allegations he deems appropriate

both verbally and in writing.

The proceedings carried out during this procedure must respect the privacy and dignity of both the workers part of the procedure and any third party participating in it. Notwithstanding the foregoing, the interviews and proceedings carried out by the Instructor and the advisors may be recorded, registered and / or documented by any means, prior information of the data processing to the interested parties.

7.8. Completion of the procedure (3): Report

Once the investigation has been completed, the Investigating Body will prepare within three (3) working days from the end of the investigation a **Report of Conclusions**, which will contain a resolution of the investigation on the existence or non-existence of harassment and a proposal for resolution of the conflict, and it will be transferred, for the appropriate purposes, to the AKCOAT Directorate, in particular the **Decision Committee**, formed by the Instructor (Lidia Ruiz Cózar), the Collaborator (Raquel Amat Renau) and a third party other than the Instructor and the Collaborator (Mikel Ramirez Taberero).

Completion of the procedure will follow the following steps:

(i) Proposal for resolution of the conflict

a) *Conviction of the existence of harassment and the existence of evidence thereof:*

In the event that the existence of a situation of harassment and the existence of evidence of harassment is confirmed, the Investigating Body may propose to the Decision Committee the imposition of a disciplinary sanction against the harasser under the Disciplinary Regime contained in article 29 of the State Collective Agreement for the trade of distributors of specialties and pharmaceutical products and in the Workers' Statute; sanction that can become that of dismissal.

b) *Absence of proof from which the existence of harassment can be concluded, but conviction of the existence of a personal conflict between colleagues:*

In the event that the Company, once the investigation procedure has been concluded, does not have clear elements to determine the existence of harassment (fulfilling the requirements for it) or this cannot be accredited, but nevertheless it is concluded that what underlies is a relevant personal conflict generated in the work, the Management must put all the means at its disposal to seek a remedy to said conflict, proposing mediated solutions.

c) *Absence of proof from which the existence of harassment can be concluded, but conviction of the existence of an employment conflict between colleagues:*

In the event that the Company concludes that the situation is not sexual harassment or because of sex, but rather a labor dispute between workers for professional reasons, the Management of the Company must put all the means at its disposal to seek a remedy to said conflict, proposing mediated solutions.

d) *Conviction of intentionally false denunciation:*

If, on the other hand, the existence of a situation of harassment is not confirmed and, in addition, at the end of the procedure, the Investigating Body determines the manifest intentional falsity of the complaint and said intentional falsehood is capable of being accredited, whether the complainant is the alleged

harasser or another worker, it may propose disciplinary sanctions to be imposed against the author of these false accusations.

It should be noted that this conclusion will require that sufficient evidence of the manifest malicious falsity of the complaint has been obtained.

(ii) Measures to compensate the alleged harassed and deter workers so that they do not incur in future situations of harassment

The Investigating Body may propose measures aimed at compensating the alleged harassed and deterring workers from future situations of harassment, including the following:

- Psychological and social support to the harassed and his family.
- Modification of those working conditions that, with the prior consent of the harassed worker, are considered beneficial for their recovery.
- Adoption of surveillance measures in protection of the harassed worker .
- Reiteration of the ethical and moral standards of the company.

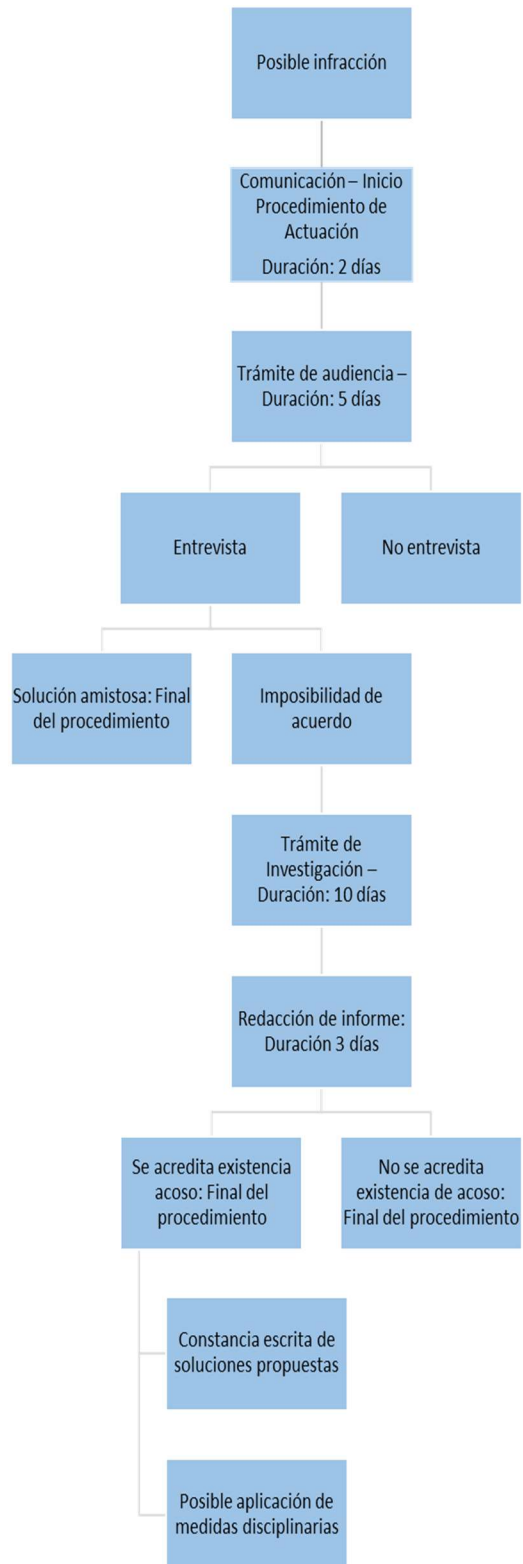
(iii) Resolution of the dispute by the Decision Committee

In the light of the proposals for the resolution of the dispute, the evidence obtained on the harassment, and the measures of redress, if any, proposed by the Investigating Body, the Decision-Making Committee shall adopt a well-founded resolution in this regard by a majority and shall ensure that it is carried out (for which, the vote cast by the Director-General shall be decisive).

The data related to the complaints will be deleted after two months from the moment in which the investigation of the facts alleged in the complaint ends. However, in the event of legal proceedings as a result of the investigation (either by the alleged victim or by the alleged false harasser), the data contained therein will be kept only during the period of prescription or expiration of said actions.

In any case, the data related to the facts reported will be kept, without mentioning the identity of the accused in order to analyze the behavior of employees in terms of harassment and propose the measures that may be necessary. The rights of access, rectification, cancellation and opposition may be exercised before the human resources department, by common procedures.

Outline of the action procedure:



8. PROCEDURE OF ACTION: HARASSMENT AT WORK

Next, an internal procedure is established for action by the Company in situations in which a worker denounces the existence of workplace harassment or events that may be considered as workplace harassment.

8.1. Guiding principles of the present procedure

This procedure is an agile and fast procedure that, in a climate of trust, protects the privacy, confidentiality and dignity of the affected persons and seeks sufficient protection of the worker allegedly harassed in terms of their safety and health that aims to investigate, clarify and solve possible cases of harassment that may exist in the company.

To this end, the guiding principles of this procedure are:

- a) Proceed with the discretion necessary to protect the privacy, dignity and confidentiality of the persons concerned.
- b) Likewise, sufficient protection of the alleged victim will be sought in terms of his safety and health, taking into account the possible consequences, both physical and psychological, that may arise from the situation, paying special attention to the work circumstances in which the alleged victim finds himself.
- c) Do not disclose any information to parties not involved in the case, unless necessary for the investigation.
- d) Conduct the investigation without undue delay.
- e) Achieve a fair hearing and fair treatment for all those affected.
- f) Expressly prohibit any type of retaliation or negative effects as a result of the presentation of the complaint, complaint, claim, guaranteeing the indemnity of the people who denounce, except in bad faith in the presentation of the same.
- g) Seek the truth and the clarification of the events that occurred.
- h) Guarantee the responsibility and investigative power of the Instructor during the processing of the procedure.

8.2. Instructor body

An investigating body is designated as responsible for the processing of this procedure, this will be the same for the entire Company, including all the work centers that it has at all times.

The main mission of the Investigating Body will be to promote, ex officio or at the request of a party, the processing of this internal procedure of action, in the event that it becomes aware of a situation potentially constituting harassment, as well as to provide support and help to the workers allegedly harassed, carry out the appropriate procedures and implement the relevant measures and procedures.

To this end, AKCOAT appoints an investigative and follow-up commission for cases of sexual and gender-based harassment consisting of:

- Instructor to Mrs. Lidia Ruiz Cózar, who holds the position of BU Human Resources Section Manager in the Company,

- Incases in which it is exceptionally necessary for the development of its functions, it will rely on a collaborator, Mrs. Raquel Amat Renau who belongs to the Finance Department.

These people are located in the Company's work center at Calle Ceuta nº 13, Polig Ind. El Colomer, CP-12200 Onda (Castellón).

However, in the event that the Investigated party must be the Instructor or his collaborator, or affected by a relationship of kinship or affectivity, friendship or manifest enmity, of immediate superiority or hierarchical subordination, or by any other type of relationship with respect to the affected person or the person denounced, which may cast doubt on his objectivity and impartiality in the process, the Applicant or Third Party Applicant must address his Communication of Initiation of the Action Procedure to the Management of the company, specifically to D. Juan del Casar Ximénez.

In this case, it will be the General Management of the company, who will determine the person who will exercise the functions of Instructor for that Action Procedure.

Likewise, any worker or person who feels harassed or who has knowledge of an alleged situation of harassment, but who prefers to keep their identity anonymous, may formalize the complaint through the suggestion box.

Therefore, the means of communication are:

- By email to the Instructor: l.ruiz@akcoat.com
- By email to the Partner: r.amat@akcoat.com
- In person, either in writing or verbally, to the Instructor or Collaborator.
- Through the complaints channel established in the suggestion box.

Such communication shall initiate the procedure laid down in paragraph 8.4.

8.3. Preventive measures

In cases of complaint of harassment and until the closure of the procedure, the AKCOAT Directorate will, at the proposal of the Investigating Body, adopt a precautionary measure in situations of special gravity or in situations in which the facts denounced come to constitute reliable indications of the existence of harassment.

In addition, the precautionary measures that, where appropriate, may be adopted must be reasonable and proportionate to the purpose that they are intended to achieve: mainly, to try to avoid that during the investigation new events occur that aggravate the situation, generating greater damage to the worker or workers allegedly harassed.

Non-substantial functional and geographical mobility are contemplated as possible precautionary measures in order to eradicate the situation of conflict and/or harassment that is being investigated.

8.4. Initiation of the procedure

The Procedure will be initiated by means of the Communication addressed to the Instructor or the Collaborator by the affected person (Applicant) or by a third party who has knowledge of the facts (Third Party Applicant). This letter may be submitted in person, by email to the address of the Instructor or Collaborator, as well as through the suggestion box.

In the event that the Communication is made by a Third Party Applicant, your privacy will be protected, so that only the Instructor can know your identity, without this data being able to be relayed to third parties in any case.

Attached to this Protocol is a model of "*Communication of initiation of the Procedure of Action*" (*Annex I*), made available to workers so that they can use it as a Communication form. However, the complainant is free to use the writing he deems appropriate to communicate the situations of possible harassment, including verbal communication to the Instructor or Collaborator, who will record such statements in order to start the procedure.

8.5. Preliminary

Once the procedure has begun, the Instructor will hold a meeting prior to the formal start of the procedure, either electronically or in person, with the affected person (Applicant) or with the third party with knowledge of the facts that has initiated the procedure (Third Applicant), if this is known.

This previous meeting aims to inform about the procedure, explain the steps to follow and refresh concepts in order to remember the training carried out to define the regime of obligations and responsibilities before a complaint of harassment at work.

After the conceptual presentation made by the Instructor, the person affected by a possible situation of harassment will express in writing his willingness to continue or not with the internal action procedure, despite the will to continue expressed by the Third Party applicant.

The minutes of the meeting that are signed must include as a minimum content, the clear and unequivocal will of the person allegedly affected by a situation of harassment and the recommendation, where appropriate, made by the Company or the Third Party Applicant.

If the person allegedly affected expresses his opposition to continuing with the procedure of action, it will end at this time, unless the Management of the Company has clear indications that workplace harassment has occurred. In such cases, the Investigating Body will continue the investigation without involving the affected person taking the necessary preventive measures to prevent this situation from recurring.

This meeting must be held within a maximum period of three (3) business days from the receipt of the communication of the initiation of the procedure.

8.6. Development of the procedure (1): Hearing procedure

Once the Communication has been made to the Instructor and the previous phase established in the previous point has been carried out, the latter will open the hearing procedure within a maximum period of two (2) business days following the receipt of the Communication.

At the time of opening of this procedure, the Instructor will communicate in writing both to the Investigated and the Applicant:

- The facts contained in the communication document, which may include literal extracts and / or screenshots of the communication.
- The possibility of presenting as many pleadings as they deem appropriate during the hearing process, as well as the possibility of requesting meetings or interviews with the Instructor, which must be granted.

- If you wish to carry out a joint interview with the other party involved and directed by the Instructor, in order to reach an amicable agreement in this process.

In the event that both parties agree to conduct the joint interview, it must be conducted. The objective of this interview is to clarify the facts and reach an amicable solution between the parties, so the Instructor will meet with the affected parties with the aim of resolving the dispute. If the situation of harassment is solved in this interview, the procedure of action will end at this time, leaving a record of the solution reached by writing of which the person Investigated, the alleged victim and the Instructor will have a copy.

The hearing procedure will have a maximum duration of five (5) business days, after this period, or if once the joint interview has been carried out, no amicable agreement has been reached, the procedure will continue through the Report Procedure.

8.7. Development of the procedure (2): Research

In order to guarantee the agility and speed of this procedure, it should not be delayed for more than ten (10) working days, unless, due to the complexity of the file, the Investigating Body decides to extend it, leaving a record of the reasons for the extension and the maximum period for which the procedure will be extended.

Through this procedure, the Instructor will carry out as many steps as he deems appropriate in order to clarify the facts denounced. Throughout this process, the possibility of the affected parties to present as many pleadings as they deem appropriate will persist, as well as the possibility of requesting meetings or interviews with the Instructor, which must be granted.

Thus, as an example of the possible steps to be practiced, the Instructor may:

- Conduct confidential questionnaires and interviews with the people you deem appropriate.
- Arrange hearings with the affected worker , the alleged harasser, the superiors and colleagues of the alleged harassed and with any person it deems necessary.
- Collect as much information as possible through the Company's documentation. The General Directorate and the person responsible for the persons involved will collaborate in the provision of all the documentation that the Investigating Body requires for the clarification of the facts.
- If it is essential for the clarification of the facts, adopt surveillance measures through detectives or computer, telematic or audiovisual means, provided that they meet criteria of reasonableness, suitability and proportionality, taking into account respect for the right to privacy of workers or any other fundamental right.
- Request external help (lawyers, psychologists or other professionals).
- Any other proceedings that the Investigating Body deems necessary for the clarification of the facts.

The intervention of witnesses and actors will be strictly confidential and their intervention will only be requested in those cases that due to the characteristics of the complaint so require and in no case suppose a prejudice to the complainant.

The accused will be summoned for a private interview in which he can make the allegations he deems appropriate

both verbally and in writing.

The proceedings carried out during this procedure must respect the privacy and dignity of both the workers part of the procedure and any third party participating in it. Notwithstanding the foregoing, the interviews and proceedings carried out by the Instructor and the advisors may be recorded, recorded and / or documented by any means, prior information of the data processing to the interested parties.

8.8. Completion of the procedure (3): Report

Once the investigation has been completed, the Investigating Body will prepare within three (3) working days from the end of the investigation a **Report of Conclusions**, which will contain a resolution of the investigation on the existence or non-existence of harassment and a proposal for resolution of the conflict, and it will be transferred, for the appropriate purposes, to the AKCOAT Directorate, in particular the **Decision Committee**, formed by the Instructor (Ms Lidia Ruiz Cózar), the Collaborator (Ms Raquel Amat Renau) and a third party other than the Instructor and the Collaborator (D. Mikel Ramirez Taberero).

Completion of the procedure will follow the following steps:

(iv) Proposal for resolution of the conflict

a) Conviction of the existence of harassment and existence of evidence thereof:

In the event that the existence of a situation of harassment and the existence of evidence of harassment is confirmed, the Investigating Body may propose to the Decision Committee the imposition of a disciplinary sanction against the harasser under the Disciplinary Regime contained in the Collective Agreement applicable to this company and in the Workers' Statute; sanction that can become that of dismissal.

b) Absence of evidence from which the existence of harassment can be concluded, but conviction of the existence of a personal conflict between colleagues:

In the event that the Company, once the investigation procedure has been concluded, does not have clear elements to determine the existence of harassment (fulfilling the requirements for it) or this cannot be accredited, but nevertheless it is concluded that what underlies is a relevant personal conflict generated in the work, the Management must put all the means at its disposal to seek a remedy to said conflict, proposing mediated solutions.

c) Absence of proof from which the existence of harassment can be concluded, but conviction of the existence of an employment conflict between colleagues:

In the event that the Company concludes that the situation is not about workplace harassment, but rather about a labor dispute between workers for professional reasons, the Company's Management must put all the means at its disposal to seek a remedy to said conflict, proposing mediated solutions.

(d) Conviction of intentionally false reporting:

If, on the other hand, the existence of a situation of harassment is not confirmed and, in addition, at the end of the procedure, the Investigating Body determines the manifest intentional falsity of the complaint and said intentional falsehood is capable of being accredited, whether the complainant is the alleged harasser or another worker, it may propose disciplinary sanctions to be imposed against the author of

these false accusations.

It should be noted that this conclusion will require that sufficient evidence of the manifest malicious falsity of the complaint has been obtained.

(v) Measures to compensate the alleged harassed and deter workers so that they do not incur in future situations of harassment

The Investigating Body may propose measures aimed at compensating the alleged harassed and deterring workers from future situations of harassment, including the following:

- Psychological and social support to the harassed and his family.
- Modification of those working conditions that, with the prior consent of the harassed worker, are considered beneficial for their recovery.
- Adoption of surveillance measures in protection of the harassed worker .
- Reiteration of the ethical and moral standards of the company.

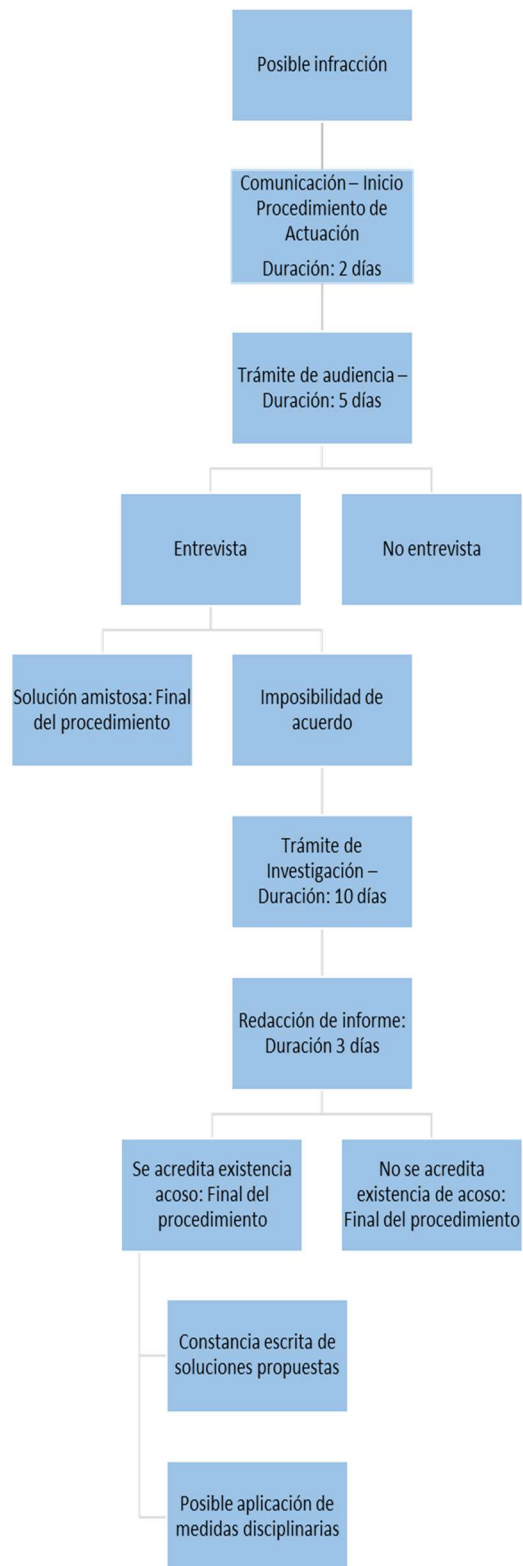
(vi) Resolution of the dispute by the Decision Committee

In the light of the proposals for the resolution of the dispute, the evidence obtained on the harassment, and the compensation measures, if any, proposed by the Investigating Body, the Decision Committee shall adopt a reasoned decision by a majority on the matter and shall ensure that it is carried out (for which, as already noted at the beginning of this paragraph 1.5., the vote cast by the Director-General shall be direct.

The data related to the complaints will be deleted after two months from the moment in which the investigation of the facts alleged in the complaint ends. However, in the event of legal proceedings as a result of the investigation (either by the alleged victim or by the alleged false harasser), the data contained therein will be kept only during the period of prescription or expiration of said actions.

In any case, the data related to the facts reported will be kept, without mentioning the identity of the accused in order to analyze the behavior of employees in terms of harassment and propose the measures that may be necessary. The rights of access, rectification, cancellation and opposition may be exercised before the human resources department, by common procedures.

Outline of the action procedure:



9. FALSE COMMUNICATIONS AND DISCIPLINARY MEASURES

In the event that it is proven that the Applicant has made a false Communication, mediating bad faith and with the sole purpose of harming the accused person, the appropriate disciplinary measures will be taken. Such qualification is the power of the Instructor and for its assessment the presumption of innocence must be respected, and only those Communications in which the existence of bad faith and the total absence of foundation are clearly established must be declared false.

If, on the other hand, the procedure proves facts that are classified as a Conflict or that presented serious doubts about their classification, the Communication of said procedure may not be, in any case, considered as false.

In the event that the Instructor qualifies a Communication as false, he must inform the Third Party Applicant of this circumstance by means of a reasoned writing.

The facts and circumstances that are accredited during the action procedure will derive the disciplinary measures that the Management of the Company deems appropriate, in accordance with the Consolidated Text of the Law on the Workers' Statute and the Collective Agreement applicable to this company, relating to the disciplinary regime.

In the event that the sanction imposed on the harasser does not imply his departure from the Company, the Company will adopt, whenever possible, the necessary measures so that the harasser and victim do not share a work environment. By adopting these measures, the working conditions of either party cannot be improved or worsened, and the victim will have preferential treatment before the adoption of these.

Likewise, the Company must act disciplinarily in cases in which it is determined that a false complaint or communication has occurred.

10. CONFIDENTIALITY AND PROTECTION OF THOSE AFFECTED - VALIDITY AND REVIEW

This Protocol is approved for an indefinite period, although the Company may modify, update or repeal it at any time.

The personal data generated in the application of this Protocol will be governed by Organic Law 3/2018, of December 5, on the Protection of Personal Data and guarantee of those of digital rights, Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and the free movement of these, as well as by the rules that enter into force later and that modify said regulation.

This Protocol will be subject to periodic review by the Company. These reviews shall take into account the suggestions made by the workers, as well as the results resulting from the application of the Protocol.

Likewise, this protocol will be incorporated into the Equality Plan.

This protocol will be developed taking into account that the privacy, confidentiality and dignity of the affected persons are protected in any case. Likewise, sufficient protection of victims will be sought in terms of their safety and health, taking into account the possible physical and psychological consequences that may arise from the situation, paying special attention to the work circumstances in which the alleged harassed person is.

Throughout the procedure, strict confidentiality will be maintained and all investigations will be carried out with tact, and with due respect, both to the complainant, to the victim, and to the accused, whose guilt will not be presumed.

All persons involved in the process will have the obligation of confidentiality, and will be identified in the file.

ANNEX I

Communication initiation of proceedings against harassment

DATE: ___ / ___ / _____

Applicant and victim data¹

Name: _____

Phone: _____

Victim Third

In case the applicant is a third party, specify the harassed worker :

Name: _____ **Cargo:** _____

Description of the facts:

Attached documentation: NO YES (detail):

In _____ to ___ of _____ of _____

Signature

(Space reserved for completion by the instructor of the procedure)

Date of entry:

Signature and seal:

¹ The applicant is informed and expressly consents that the personal data he has provided to the company will become part of a file under the responsibility of the company in order to carry out the management and investigation of the facts denounced and those that may arise during the investigation procedure, authorizing the transfer of their data to other related persons or entities, such as the advice of the company, mutual societies and the service of prevention of occupational risks and health surveillance, courts and security bodies. The applicant is informed that he may exercise the rights of access, rectification, opposition and cancellation by writing to the Management of the Company at the registered office and that in any case the data provided will be kept for the duration of the investigation and subsequent actions until the course of 4 years after the final conclusion of the situation.

ANNEX II

DOCUMENT DELIVERS PROTOCOL PREVENTION OF SEXUAL HARASSMENT, BASED ON SEX AND WORK

Name and surname:

DNI/NIE:

Date:

I have received a copy of the PROTOCOL FOR THE PREVENTION OF SEXUAL HARASSMENT, BASED ON SEX AND WORK and I assure you:

- I have a copy in my possession.
- Know, understand and assume the internal rules exposed.
- Know that failure to comply with internal rules may involve the application of the disciplinary regime provided for in the Collective Agreement applicable to this company.

Worker's signature