

**PROTOCOL ON PREVENTING AND
ADDRESSING HARASSMENT IN
MAPFRE**



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I. DECLARATION OF PRINCIPLES

Since the culture and values at MAPFRE are based on respect for the dignity of the people who make up its organization, this action protocol on preventing and addressing harassment within the company was created. It sets out the guidelines to be followed for both preventing and, where necessary, remediating this type of behavior.

This protocol should be familiar to the entire workforce and it entails the implementation of policies that help, firstly, to keep the workplace free from harassment and prevent such situations from arising and, secondly, to ensure, should they arise, appropriate procedures are in place to address and remediate the problem.

To this end,

MAPFRE BELIEVES:

- ◆ That dignity is an inalienable right of every person, and any manifestation of workplace harassment is unacceptable.
- ◆ That harassment at work contaminates the workplace and can have a negative impact on the health, well-being, trust, dignity and performance of the people who are subjected to this.
- ◆ That the entire MAPFRE workforce must contribute to ensuring that the workplace is a place where people's dignity is respected.
- ◆ That workplace harassment is inappropriate behavior, so the company as a whole must act against it, as it does with any other form of inappropriate behavior, and the entire workforce is responsible for complying with the provisions of this protocol.
- ◆ That workplace harassment and false allegations of workplace harassment are an intolerable manifestation of intimidation.



MAPFRE DECLARES:

- ◆ That every member of the workforce has the right to be treated with dignity and respect.
- ◆ That it expressly opposes, and will not tolerate, any harassment in the workplace, regardless of who the victim or perpetrator is in the reported situation.
- ◆ That any member of the workforce has the right to submit a complaint in the event of such an incident.

MAPFRE URGES:

- ◆ Senior Management and other individuals responsible for teams of people to apply these principles and to take the necessary actions to ensure they are complied with, and also to ensure their direct reports do not become victims of workplace harassment.
- ◆ All members of the workforce to observe this code of conduct, to ensure all persons are treated with respect and dignity and to use this protocol responsibly.

MAPFRE IS COMMITTED TO:

- ◆ Informing and training the entire workforce on the content of this protocol, and to raising awareness of the values enshrining the respect for dignity, on which this protocol is based.
- ◆ Integrating actions for preventing and resolving situations involving harassment into human resources management, placing at their disposal the means to prevent workplace harassment from occurring.
- ◆ Investigating situations of harassment that occur with utmost confidentiality, acting expeditiously on any complaints that may be filed with due consideration, and seriousness.
- ◆ Creating channels for all persons who may be subjected to workplace harassment to report such behavior, providing appropriate procedures to address the problem should it arise and to prevent it from happening again, and also safeguarding the right to make use of such procedures.



- ◆ Protecting individuals from potential reprisals for having submitted a complaint about harassment or for having testified.
- ◆ Providing any assistance deemed necessary for the victim.
- ◆ Taking disciplinary action against any perpetrator of harassment, or against any individual making false reports.



II. DEFINITIONS

A) What is meant by psychological harassment in the workplace (mobbing)?

Psychological harassment in the workplace is a situation in which a person or group of persons exercise extreme psychological abuse in a systematic and recurrent manner and for a long time against another person or persons either in the workplace or in relation to the workplace.

Such behavior, which often leads to continued and prolonged work absences, is intended to destroy victims' communication networks, destroy their reputation, undermine their self-esteem, disrupt the exercise of their duties, deliberately degrade their working conditions, occasioning incremental and continuous harm to their dignity, to eventually get them to leave their job position.

This psychological violence is sometimes based on victims' gender, race, age, opinion, religious beliefs, or personal or social circumstances, and in all cases, it violates the personality, dignity or physical or mental integrity of an individual.

The determining factors for psychological harassment behaviors can be summarized as:

- √ INTENTION TO HARM: Actual existence of an intent to harm professional and personal dignity.
- √ PERSISTENCE OVER TIME
- √ VIOLATION OF THE FUNDAMENTAL RIGHTS OF THE INDIVIDUAL

There are various types of psychological harassment:

- Descending Psychological Harassment: When the harasser occupies a more senior job position than the victim.
- Horizontal Psychological Harassment: Occurs between persons of the same hierarchical level.
- Ascending Psychological Harassment: The harasser occupies a lower hierarchical level than the victim.



B) What is meant by sexual harassment and gender-based harassment?

- Sexual harassment is any verbal or physical behavior of a sexual nature that has the purpose or produces the effect of threatening a person's dignity, particularly when creating an intimidating, demeaning or offensive environment.

Although harassment is not generally thought of as sporadic but rather as ongoing, repeated and corraling, a single episode of sufficient severity may constitute sexual harassment.

The determining factors for sexual harassment behaviors can be summarized as:

- PROPOSITION: Understood as the "proposition initiative" concerning sex.
 - REJECTION: Proposition is followed by a reaction of rejection. The refusal of the proposition in any way or by any means is sufficient.
 - INSISTENT CONDUCT or ISOLATED OCCURRENCE of sufficient gravity.
- Gender-based harassment is any behavior engaged in based on a person's gender, with the purpose or effect of violating the person's dignity and creating an intimidating, demeaning or offensive environment.

Sexual and gender-based harassment will be considered to be discriminatory in any case. In addition, making a right—or the possibility of obtaining a right or a better situation—conditional upon accepting a situation constituting sexual or gender-based harassment will also be considered an act of gender-based discrimination.

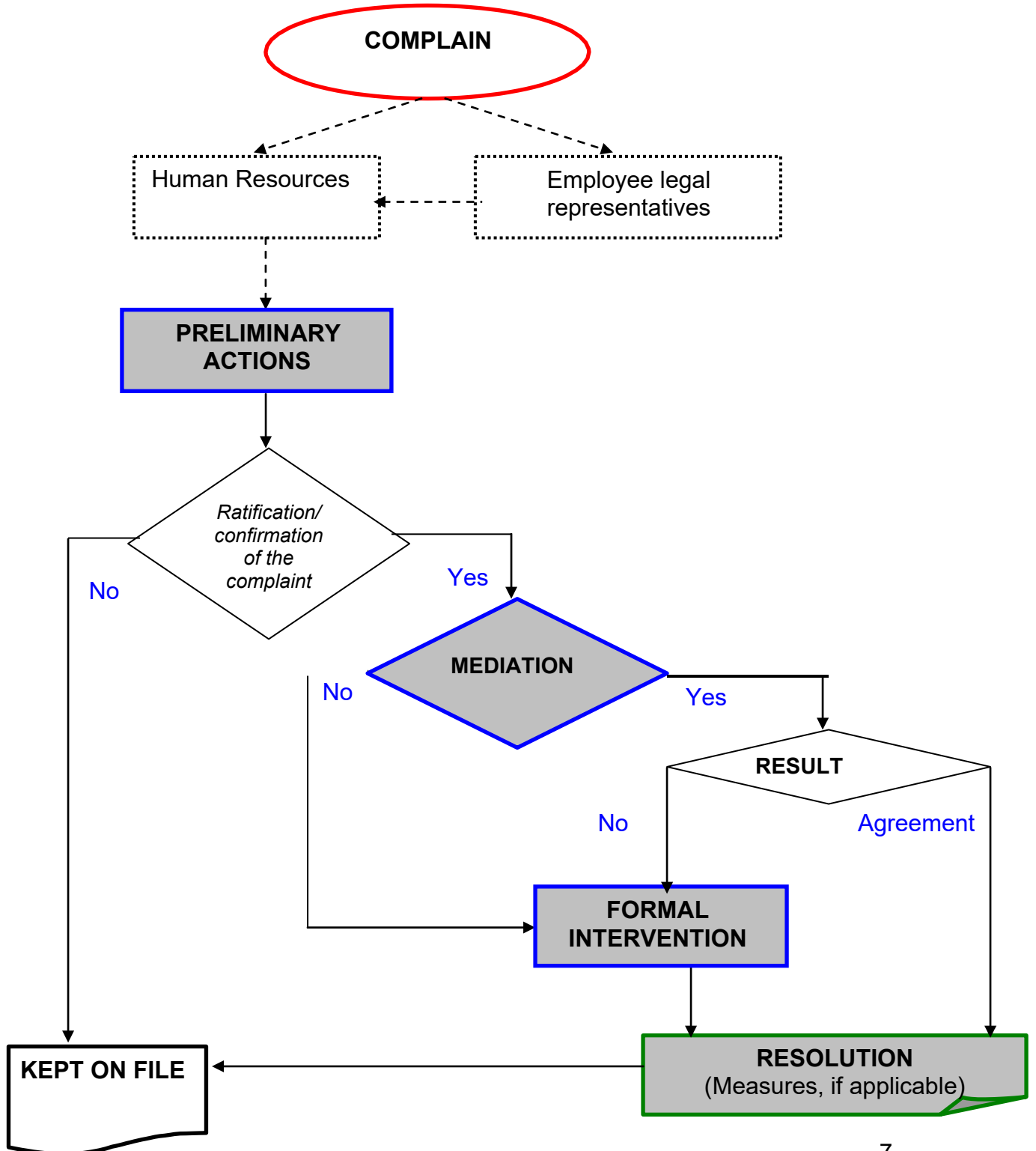
C)

False complaint

A complaint in which, upon examination of the situation, the following two requirements are simultaneously met: a) the complaint lacks justification or grounds and b) it was reported in bad faith by the individual making the allegation or for the sole purpose of harming the reported person (reverse harassment) on the same basis as that which is set out in the above definitions.



III. ACTION PROCEDURE FOR ADDRESSING HARASSMENT SITUATIONS





A) COMPLAINT:

People who feel subjected to harassment may bring this to the attention of the Executive Management of Human Resources at MAPFRE, through their company's HR Department or MAPFRE's Labor Relations Department. This may also be reported to any employee legal representative, who will immediately bring it to the attention of Human Resources.

The complaint may be made orally or in writing.

The following will not be addressed using the procedure set out in this protocol:

- √ Anonymous complaints.
- √ Reports pertaining to matters related to other types of complaints.

In addition, an employee legal representative or anyone who is aware of the existence of such a situation may submit a complaint. In this case, the complaint must always be submitted in writing.

B) PRELIMINARY ACTIONS and MEDIATION:

1. To investigate the complaint, the following must be known:

- √ The identity of the complainant and of the person who is allegedly being harassed, if different from the complainant.
- √ Description of the facts, stating dates and other relevant circumstances.
- √ Identification of the person(s) allegedly engaging in harassment.

2. Human Resources will immediately acknowledge receipt of such a complaint and transfer it to persons who will open a corresponding case file (hereinafter, the investigating team).

Both the person allegedly being harassed and the person reported may be assisted by employee legal representatives at all stages of the proceedings.

No person who is a relative, manifest friend or enemy, or immediate hierarchical superior or subordinate of the complainant or of the person being reported may participate in the investigation of the case.



3. The investigating team will make initial contact with the complainant within five working days from receipt of the complaint.

Through this initial contact, the investigating team and the complainant will conduct a joint analysis of the alleged facts, after which the complainant will decide whether or not to confirm the complaint.

In the event of a verbal complaint, the investigating team will obtain the complaint in writing, and the complainant must sign it to attest to their agreement and confirmation.

Should the complainant be different from the person who is alleged to be experiencing a situation of harassment (hereinafter referred to as the affected person), the complainant will be included in this initial contact with the investigating team to examine the facts reported and decide whether or not to confirm the complaint submitted by the complainant.

When sexual harassment is reported, the affected person may request that they explain the situation to a person of the same gender in the investigating team.

Once the complaint has been confirmed, the investigating team:

- √ will obtain the affected person's express written consent so as to be able to access the information required for investigating the case.
- √ will inform the affected person that the information to which the investigating team has access in the course of the investigation of the case and the minutes drawn up will be treated in a confidential manner, except where they must be used by the company in legal or administrative proceedings.
- √ may, at this initial stage, agree to the adoption of precautionary measures, in cases where circumstances make this advisable.
- √ will offer the affected person the possibility of trying to resolve the problem through mediation. This means acting with agility, such that solutions can be considered in a confidential, straightforward and discreet manner.

In the event that the circumstances permit this type of mediation, the actions of the investigating team would focus on an interview with the person reported and another with the affected person, with the purpose of MEDIATING in the case, through practical advice and proposals for a solution to both parties. The investigating team will assess whether or not it is appropriate to hold a joint meeting.

The investigating team will write a brief report on the conclusions reached by means of mediation:



- ✓ Agreement between the parties: End of the investigation and, where appropriate, adoption of the measures identified.
- ✓ No agreement: The informal mediation procedure then becomes the step prior to initiating formal proceedings.

Preliminary proceedings and mediation will last a maximum of ten working days. However, the investigating team will be able to set an extension to this deadline in exceptional cases.

C) FORMAL INTERVENTION:

1. INITIATION

Formal intervention will be initiated:

- ✓ When the mediation process is not considered appropriate.
- ✓ When mediation has been conducted but the problem has not been resolved.

2. ACTIONS:

The investigating team will draw up a working plan, in line with the following guidelines:

- ✓ It will once again assess the need for precautionary measures, such as separating the parties involved while the investigation is in progress.
- ✓ It will gather as much information as it deems necessary about the background of the parties involved.
- ✓ It will determine which individuals are to be interviewed, primarily taking into account the proposals of the affected person and the person reported.
- ✓ It will conduct interviews, for which:
 - It will obtain from the persons interviewed their express written consent to access the information necessary for conducting the investigation procedure.
 - It will inform the persons interviewed that the information to which it has access in the course of the investigation procedure



and the minutes drawn up will be treated in a restricted and confidential manner, except where it must be used by the company in legal or administrative proceedings.

- It will inform interviewees that everything stated will remain confidential, both on their part and on the part of those investigating the case, to which end they will be instructed not to disclose the content of the interview to anyone.
 - Whenever the affected person or the reported person has so requested, the team will offer the persons interviewed the possibility of having employee legal representation present during the interview, should they so desire.
- √ It will draw up minutes of all meetings and interviews held, ensuring complete confidentiality and restriction of their contents. These minutes will be signed by the participants and will remain in the custody of the investigating team.
- √ It will identify the evidence that needs to be examined, establish the procedure for obtaining this, examine the evidence identified and keep this in its custody.

The investigating team will inform the parties directly involved of the procedure to be followed and may enlist the cooperation of others in conducting the proceedings.

The formal intervention will last a maximum of fifteen working days. However, the investigating team will be able to set an extension to this deadline in exceptional cases.

3. RESOLUTION:

Upon completion of the investigation, the investigating team will, within five working days, draw up a final report of conclusions to be submitted to the Labor Relations Department and the HR Department, proposing the measures to be taken.

Human Resources will propose appropriate actions to company Senior Management and inform the parties concerned of the report's conclusions and proposed solution. The conclusions will be passed on to employee legal representatives once they have been informed of the process.

The company will take any corrective measures it deems appropriate, consisting of:

- Disciplinary action against the harasser or person who submitted a false complaint.
- Psychological or medical help for the affected persons.
- Any other action considered appropriate.



- Filing of the case

This procedure will apply irrespective of any legal action that the complainant may bring before any administrative body or court of law.
