



# Corporate Harassment prevention Policy

CEO  
25<sup>th</sup> April 2023

**VERSION CHECK**

Version	Date	Changes
V1	25/04/2023	New Creation

# CONTENTS

1. Statement of principles .....	4
2. Purpose .....	4
3. Scope of application .....	4
4. Definitions and Concepts.....	5
5. Measures for the prevention of harassment .....	6
6. Rights and Obligations of the Company .....	6
7. Employee Obligations and Rights .....	7
8. Safeguards .....	7
9. Handling of Harassment Complaints by Region .....	8
10. Corrective and Disciplinary Measures in case of Discriminatory Behavior and/or Harassment .....	8
11. Company Protection Measures .....	9
12. Training .....	9
13. Review and update .....	9

# 1. Statement of principles

Under this Policy, Urbaser establishes a zero-tolerance policy for any type of workplace harassment or discrimination throughout the workplace. Urbaser is committed to creating a hostile-free work environment that allows employees to attain better levels of job satisfaction and contribute more effectively to the organization's success.

The company's management expresses its concern and commitment to preventing and resolving potential workplace harassment, stating that everyone has the right and responsibility to be treated with dignity and respect. By doing so, it expresses its rejection of all forms of workplace harassment that violate the dignity of employees, and does not permit or tolerate harassment in any of its workplaces.

All those forming part of Urbaser, especially those with special responsibilities, are entrusted with ensuring and preventing that no form of harassment takes place.

Consequently, all individuals within the scope of application of this Policy have the right and obligation to use the procedure established in each country (hereinafter "the procedure") with full guarantees and not to be subject to intimidation or unfair, discriminatory or unfavorable treatment as a result. This protection applies to any party involved in the procedure.

Similarly, any employee who becomes aware of an alleged case of harassment must report it immediately through one of the channels outlined in this Policy (**Appendix 1**). It should be emphasized that both the tolerance of harassing behavior and the concealment of such behavior, if known, may result in disciplinary action under the current regulations and this Policy.

## 2. Purpose

This Policy is intended to:

- Create a corporate and/or worldwide document for the company, which will serve as the framework standard for the approval of any local procedure/protocol/regulation produced in this regard.
- Make known the communication and complaint channels in each country.
- Adopt the necessary measures to avoid any situation of harassment and/or discrimination.
- Ensure that all employees understand the sorts of behavior that constitute harassment, bullying, and/or discrimination, as well as their duties to avoid such behavior.
- Provide practical guidance on how to deal with harassment and bullying.

## 3. Scope of application

This Policy is applicable to all investees (companies, temporary partnerships, joint ventures or any other form of association) in which URBASER, S.A.U. is the majority shareholder or has control (hereinafter, the "Company" or "Urbaser").

In those investee companies in which this Policy is not applicable, the alignment of policies will be promoted through their respective representatives in the administrative bodies.

This generally applicable policy is of a corporate nature. It does not affect the application of international and national standards in the respective countries, nor the applicable conventional labor standards.

This policy shall be applicable to any conduct that may transpire within the work environment.

## 4. Definitions and Concepts

To mitigate any potential harassment scenarios, it is imperative to provide a concise clarification of moral harassment, distinguishing it from sexual harassment, gender-based harassment, and harassment based on sexual orientation, gender identity or expression. We are implementing measures to raise awareness among the Urbaser workforce regarding behaviors or attitudes that may seem harmless but could potentially lead to harassment. This will enable them to identify such situations, especially when they are the ones affected.

### Discrimination

At Urbaser, we have a zero-tolerance policy towards any form of discrimination based on factors such as sex, cultural or ethnic origin, religious affiliation, age, language, sexual orientation, gender identity, and disability. There are two types of discrimination:

- **Direct discrimination:** when someone is disadvantaged by being treated less favorably than another person is, has been or would be treated in a comparable situation, due to their sex, gender identity or expression, ethnicity, religion or belief, disability, sexual orientation or age.
- **Indirect discrimination:** occurs when an individual is unfairly disadvantaged by the implementation of a seemingly impartial provision, criterion, or practice, but which may put persons of a particular sex, gender identity or expression, ethnicity, religion or belief, disability or group of persons at a particular disadvantage.

### Harassment

Harassment can be obvious or it can be subtle. It has the potential to be executed on a one-to-one basis or involve groups of people. Whatever form bullying takes, it is unwarranted and unwelcome to the person being bullied. Instances of bullying and harassment may manifest in various forms, including but not limited to written communication, visual images, email, cyber bullying, etc.

It is not the intention of the harasser that is the primary concern, but rather the conduct itself and its impact on the recipients who are harassed or bullied. However, the author's intention is relevant to understand the impact of behavior on the individual and to choose the most effective ways to resolve the situation:

- **Moral harassment or mobbing:** moral harassment at work is unacceptable behavior. It involves continuous and deliberate mistreatment, whether direct or indirect, through actions or omissions, verbal, physical or in any other way, by a single person or by several against another, in the workplace or in the course of the employment relationship, likely to affect the dignity of the person and tending to succeed in causing annihilation or psychological destruction, causing real damage that, on many occasions, results in the affected individual leaving their job.

However, it is important to keep in mind that not all conflicts in the workplace or isolated incidents between employees can be categorized as moral harassment or mobbing. It is about pre-planned, systematic actions over a period of time that are intended to psychologically degrade the affected person to the point of producing a loss of self-esteem and disinterest in the work, thus favoring the creation of a hostile environment that can lead to their voluntary departure from the company.

- **Sexual harassment:** situation in which any unwanted verbal, non-verbal or physical behavior of a sexual nature occurs with the purpose or effect of violating the dignity of a person by creating an intimidating, degrading or offensive environment, and considered even more serious when the affected worker has expressed a desire for such behavior to cease. Repetition, permanence in time, or frequency are not required in this sort of harassment because a single act of attack or blackmail would be enough to qualify as harassment.

Some examples of this type of harassment are: deliberate and unsolicited physical contact, or excessive and unnecessary physical closeness, repeated comments or gestures of a sexual nature, offensive phone calls, letters or messages, or repeated and offensive persecution against sexual integrity, among others.

- **Gender-based harassment:** behavior carried out based on a person's sex, with the intention or effect of violating their dignity and creating an intimidating, degrading or offensive environment. This would be situations in which a person's sex is used as a conditioning factor when making decisions that affect them personally or professionally, thus producing a discriminatory attitude.
- **Harassment based on sexual orientation, gender identity and/or gender expression:** harassment based on sexual orientation, gender identity, and/or gender expression is defined as any behavior motivated by a person's sexual orientation, gender identity, and/or gender expression that has the purpose or has the effect of violating their dignity or physical or psychological integrity or creating an intimidating, hostile, degrading, humiliating, offensive, or annoying environment.

**Harassment levels** can be classified as follows, depending on the subjects involved:

- **Downward harassment:** harassment perpetrated by the employer or their representatives, someone with power over the victim, usually for hierarchical reasons.
- **Horizontal harassment:** harassment perpetrated by coworkers with no hierarchical superiority over the victim.
- **Upward Harassment:** harassment perpetrated by a person who is hierarchically subordinate to the victim.

## 5. Measures for the prevention of harassment

Urbaser will take the following steps to prevent, discourage, avoid, and punish harassing behavior:

- This Policy shall be made public in such a way as to enable the entire workforce to be aware of it.
- Awareness campaigns will be established using whatever means considered necessary, with a focus on clarifying the concepts of sexual harassment, gender-based harassment, sexual orientation, gender identity and expression, and moral harassment, as well as the company's principles.
- Specific harassment and non-discrimination training will be delivered to the whole workforce, with a focus on those with greater responsibilities (supervisors, middle management, and management).
- The Company will foster a culture of respect, correctness in the work environment, instilling in all personnel the ideals of fair treatment, respect for all individuals and their reality, dignity, and the free development of personality.
- Psychopedagogical activities will be implemented to instill attitudes and practices that promote a healthy working life.
- The procedure and the communication and complaint channels will be disseminated.

Given the geographical dispersion of Urbaser's business, the diversity of the social and cultural context will be considered for the purposes of the effectiveness of this Policy.

Above all, the company will maintain a proactive and active attitude to all measures required to achieve the objectives of this Policy, safeguarding the rights of employees.

## 6. Rights and Obligations of the Company

Urbaser is responsible for ensuring a professional and ethical work environment that respects the dignity of its employees and any third parties with whom they may come into contact. In this regard, the Company must:

- Promote a culture of respect and dignity in the workplace, avoiding any behavior or attitude that may be offensive, annoying or discriminatory.
- Communicate which offensive, annoying, or discriminatory behaviors are unacceptable.
- Ensure compliance and monitoring of the content of this Policy.
- Monitor and provide information channels regarding alleged discriminatory or harassing behavior or attitudes.
- Ensure that, in order to achieve an environment free of harassment and abuse, those with special responsibilities set an example through their own conduct.
- Facilitate access to and knowledge of protocols and/or procedures for addressing instances of harassment or discrimination.
- Investigate all known situations in accordance with established local procedures.
- Maintain confidentiality, responding appropriately to any person who communicates a complaint or report, investigating and taking appropriate action when necessary, following up and informing the person concerned about the complaint process.
- Those in authority or in middle management have a duty to report any situation they perceive to be a possible instance of harassment or discrimination.
- Consider any breach of this Policy to be unacceptable behavior that could result in disciplinary action.

## 7. Employee Obligations and Rights

Employees have the following rights and obligations:

- Right to a healthy work environment and not to be harassed or discriminated.
- Right to be heard and receive a response to a complaint.
- Right to maintain their right to privacy and to have the complaint dealt with in confidentiality.
- Right to report instances of discrimination and/or harassment to their superior (or a higher level) and/or through the ethical channel.
- Right to report instances of discrimination and/or harassment of which they are aware.
- Obligation to treat others with respect.
- Obligation and responsibility to cooperate in the investigation process in the event of a complaint.

Thus, people have a responsibility to behave in a way that promotes a non-hostile and supportive environment in the workplace. They must be prepared to understand what behaviors are inappropriate and take action if they see or have evidence that someone is being harassed.

## 8. Safeguards

The procedure must comply with the following safeguards:

- **Diligence and celerity:** the procedure must be agile and fast, offering credibility, transparency and fairness. The investigation and resolution of the claimed or reported facts must be carried out in a professional, diligent, and secure manner, without undue delay, so that the procedure can be completed in the shortest possible time.

- **Respect and protection of individuals:** the company will adopt the appropriate measures to ensure the right to protection of the dignity and privacy of those affected, including those allegedly harassed and the alleged harassers. The actions or proceedings must be carried out with the utmost discretion, prudence and with due respect for all persons involved, who in no case may receive unfavorable treatment for this reason.
- **Respect for the rights of the parties:** the investigation of the complaint must be carried out with sensitivity and respect for the rights of each of the affected parties. In any case, the rights of all parties to their dignity and privacy must be guaranteed, and the right of the claimant to their physical and moral integrity.
- **Impartiality and the right to contest:** a fair hearing and fair treatment must be guaranteed for all those affected. Those involved in the procedure will act in good faith in the search for the truth and to clarify the reported facts.
- **Confidentiality and anonymity:** those participating in the procedure are required to preserve absolute confidentiality and reserve and must not transmit or disclose information about the content of complaints filed, resolved or under investigation of which they are aware.
- **Secrecy:** It is the responsibility of those involved in these procedures to exercise due discretion over the facts that they become aware of as a result of their position in the investigation and evaluation of claims, complaints, and reports, and must not use the information obtained for their own benefit or that of third parties, or to the detriment of the public interest.

The use of this Policy does not exclude any person within its scope of application from using the correct jurisdictional or administrative channels at any time.

## 9. Handling of Harassment Complaints by Region

Harassment complaints will be processed in accordance with the terms established in the existing harassment prevention protocol for each country in which Urbaser operates (see **Appendix 1**).

All these procedures are adapted to the local legislation applicable in each region.

Any Personnel who has reservations or reasonable suspicions regarding any possible violation of this policy, any connected procedure, or its implementation may approach their supervisor or the local Human Resources department to learn about the specific protocol applicable in their region.

Any potential harassment situation must be reported through the Urbaser Ethical Channel available on the website (<https://www.urbaser.com/canal-etico/>) as soon as possible. If the potential infringement has been reported to a supervisor or the Human Resources department, the person who has been informed of said issue is required to formally report it through Urbaser's ethical channel.

The company does not tolerate retaliation against staff for raising questions or concerns in good faith. Retaliation is strictly prohibited and may result in disciplinary action.

The harassment and non-discrimination protocol applicable in each country must be made public and available to all employees.

## 10. Corrective and Disciplinary Measures in case of Discriminatory Behavior and/or Harassment

For the purpose of applying corrective and/or disciplinary measures, the following shall be considered:



- 1) Transfer, relocation, change of position, shift, workday or location.
- 2) Suspension of employment and salary.
- 3) The temporary limitation on promotion.
- 4) Dismissal.
- 5) Other disciplinary measures according to current legislation in each country.

## 11. Company Protection Measures

Each country shall establish the appropriate safeguards, while adhering to the applicable regulations in each region. These measures shall include, among others:

- Ensuring that no one participating in the procedure, particularly the individual who is the victim of harassment and/or discriminatory treatment, faces retaliation.
- The company ensuring that such behavior is not repeated in the future.
- Attention, advice and legal action will be guaranteed in those cases which the final report expressly determines that there has been a situation of sexual harassment, gender-based harassment or harassment based on sexual orientation, gender identity and expression, moral harassment and discrimination, so as not to leave the victims defenseless, unprotected or alone.
- Witnesses will be interviewed and will be warned about the obligation to maintain the confidentiality of what has been discussed. Any breach of this confidentiality may lead to disciplinary consequences.
- Safeguarding of the alleged victim will be warranted, and precautionary measures may be applied to the alleged harasser, such as being removed from their duties and sent to another area, change of schedule, physical separation, among other preventive measures. These actions shall not be borne by the victim unless requested by them.

## 12. Training

The necessary training and awareness-raising actions will be promoted for the understanding, implementation, and monitoring of this anti-harassment and nondiscrimination policy.

## 13. Review and update

The Corporate Management of Organization and People Management will periodically review the content of this Corporate Policy, ensuring that it reflects the recommendations and best practices, and will propose modifications and updates that contribute to its development and continuous improvement.



[www.urbaser.com](http://www.urbaser.com)