



Harassment Prevention Guide and Protocol



Gestamp
Renewables



Gonvarri
Steel Services



GRI Renewable
Industries

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Introduction

Last xxx December 2013, the latest version of the Company's Code of Ethics and Conduct entered into force, establishing the minimum standards of behaviour that we demand from our employees.

We are a global company operating in many countries, thus interpreting and implementing some sections of the Code might be conditioned by the local customs and culture , giving rise to **different interpretations**.

Our purpose is to develop this **Harassment Prevention Guide and Protocol**, that incorporates measures for prevention and complaint in respect of possible harassment scenarios, including some minimum aspects that must be compulsory respected in order to act in an honest, responsible way, in each and every country where we operate:

- The guide **is applicable** in those countries which lack local legislation or regulations.
- It is **a reference guide**, to be used by countries with their own local legislation or regulations so that their own guide, adapted to suit their **local obligations**, may be developed.

Given **our great concern** to avoid such conflicts, as well as their consequences, we have decided to develop this guide, which will be provided with the channels and measures that may be required in order to allow its dissemination and compliance.

Purpose

In our company, we believe that personal dignity, the inviolable and inherent rights of the individual, the free development of the personality, equal treatment and physical and moral integrity are all **fundamental rights** of a person.

Harassment and violence may affect all of us. Therefore, **preventing and eradicating** this problem can only be achieved by means of consensus and collaboration from each and every member of this company.

This guide incorporates a number of general principles whose main goal is to be a reference framework for actions aiming at preventing, establishing, reporting and punishing harassment and violence at the workplace. However, the guide and its contents **must be adapted** to the local regulations of the different countries in which we operate.

The guide provides a simple, comprehensible description of the various forms of harassment (sexual, gender-based, discrimination and moral discrimination or mobbing), as described throughout this document.

Scope of application

The purpose of this guide is to develop the **BEHAVIOUR** that **ALL** of our employees must have when encountering situations that may qualify as “**harassment**”, based on two main aspects:

1. a) To establish measures focused on **PREVENTING AND AVOIDING** harassment situations or situations that are liable to be termed as harassment.
2. b) To establish an internal procedure for action in the event of an internal **DENUNCIATION OR COMPLAINT** on the part of an employee, regarding an alleged harassment scenario.

Development

Below is a summary of those conducts regarded as “**harassment**”, the prevention **measures** that have been introduced, communication **channels** and the assigned people responsible for dealing with these incidents.

Forms of harassment and harassment-related behaviour

Harassment is **persecutory, abusive behaviour towards** a person. This conduct may derive in:

Sexual harassment

Sexual harassment is any verbal or physical behaviour of a **sexual nature** the purpose of which, or **effect, is to violate the dignity of a person**, most particularly when such conduct gives rise to an **intimidating, degrading or offensive environment**.

To qualify as harassment, the **actions performed** by the harasser **must necessarily be unwanted** by the person suffering it and occur without his/her consent. Therefore, whenever said actions are accepted and consented by the recipient, no sexual harassment occurs.

Sexual harassment actions at the workplace do not need to take place for a long period of time to be considered as such. **One sole action**, if severe enough, may constitute sexual harassment.

Below is a list of behaviours that qualify as sexual harassment:

- Insinuations and jokes the contents of which are upsetting, humiliating or have a sexual nature, whether explicit or implicit; pranks or dirty jokes.
- Petitions for sexual favours, whether direct or indirect, including touching, obscene gestures and unnecessary friction.
- Letters, notes or mails of a sexual nature, that propose, encourage or put pressure on the recipient for maintaining sexual relations, or that do not pursue such goal but are nevertheless offensive and intimidating to the recipient.
- Repeated derogative or offensive comments, of a sexual nature, on the appearance and image of the worker.

- All types of sexual assault
- Any other conduct similar to any of the former that either through direct action or by taking part in it, contributes to create a situation of workplace harassment that is both unwanted by, and undesirable to, the employee.

Gender-based harassment

Any **behaviour, conduct or practice** that is carried out on the **basis of a person's gender**, for the **purpose of violating his/her dignity** and **creating an intimidating, degrading or offensive environment**.

Below is a list of behaviours that constitute gender-based harassment:

- Any harassing conduct arising from an employee exercising, or intending to exercise, his rights in terms of family care responsibilities that are usually assumed by women, such as, for example: maternity leave, reduced working hours in order to look after children, or other conducts that may be associated to the employee's culture or provided under the local laws and regulations.
- Any adverse effects that may take place against a person for complaining and reporting complaints, claims or denunciations of whatsoever type, the intention of which is to prevent discrimination or any other aspect relating to human rights, as established under the Code of Ethics and Conduct.

Moral harassment or Mobbing

All sorts of conduct, practice or behaviour that **repeatedly or systematically take place** within a working relationship, that entail, whether **directly or indirectly**, **detriment or an attack against the employee's dignity**, by attempting to subjugate him or her both emotionally and psychologically and in a violent or hostile manner, and that seeks to annul his/her capacity, professional promotion or permanence at the work place, thus affecting the work environment in a negative way.

Below is a list of behaviours that constitute moral harassment or mobbing:

- To ignore or ostracise an employee.
- To assess the employee's performance in an unequal or biased manner, criticising his/her work in a derogatory way.
- To isolate an employee; to fail to assign tasks to the employee or to assign absurd, senseless, impossible tasks or tasks below the employee's professional abilities or competencies.
- To assign an unbearable workload in a manifestly malicious way or to assign tasks that endanger the employee's physical integrity or health.
- To ridicule and imitate the employee in a derogatory way; to abuse the employee verbally; to insult or yell at the employee, criticising and reproaching him/her for anything he/she does, or for any decision that he/she makes while at work, whether directly or in front of third parties.

- To spread rumours on the employee or the private life of the victim of harassment, on the part of the harasser or harassers.
- Any conducts different from any of the above which create a situation of moral harassment against an individual, if repeatedly performed.

Condition-based harassment

Constituted by those **harassing actions based on race, sex, religion, opinion** or any other situation or circumstance, whether personal or social, aiming at harming the harassed person, **by hampering his/her full integration**.

Below is a list of behaviours that constitute condition-based harassment:

- To treat an employee in a less favourable manner, based on his/her race, religion, ethnic origin, etc.
- To place employees of a specific racial or ethnical origin or a specific religion or gender at a disadvantage with regards to other employees, unless such decision, criterion or practice may be objectively justified.

Actions or preventive measures against harassment

Preventive measures against all types of harassment are mainly based on communication, awareness-raising and training.

- The Code of Ethics and Conduct, alongside its developing guides, will be handed in to all new employees through the "Welcome Pack".
- All employees will have a copy of this guide and will sign the corresponding acknowledgement of receipt, whether through the corporate intranet or in paper.
- Our Decalogue in the area of harassment prevention, that will be available at all work centres and written in the local language.
- Training on Harassment Prevention and Protocol for reporting harassment will be added to the Annual Training Plans of all Company's facilities, in conjunction with specific training on the code of Ethics and Conduct.
- Providing information to all employees with respect to complaints channels and response mechanisms that may be used in case of occurrence of a "harassment" situation.

Processing and complaints channels

The complaint is a formal act by means of which an irregular situation that an employee may be experiencing, and which might qualify as a harassment situation, is made known. After making a complaint, a procedure is initiated, the goal of which is to investigate the facts that might qualify as harassment.

The complaint must be filed by the employee himself/herself, following the established mechanism.

If the employee requires the assistance or collaboration of a Company member, the request will be submitted to the Head of Human Resources or Head of the Legal Department of the centre where the employee works.

The routes or channels established for making complaints are the same as those provided under the Code of Ethics and Conduct, provided that the local regulations do not demand other communication and/or participation channels, in which case this guide will be conveniently adapted.

As defined in the Code, three communication channels are available to employees at all levels, as well as third parties.

- 1. Communication via internet:** it will be made through the corresponding email addresses as shown on the corporate web page and the Intranet, which allows to make enquiries with regards to the Code and to report possible breaches or infringements, in full confidentiality. The generic addresses created to such effect are the following:

ethicalcode@gonvarri.com

ethicalcode@gestampren.com

ethicalcode@gri.com.es

- 2. All employees will be able to contact, whether in person or by phone,** the Corporate Head of Human Resources and/or the Corporate Head of the Legal Department, in order to make the corresponding enquiry or to request the relevant clarifications.

- 3. The forms provided for complaint-making purposes will be made available to all employees** at accessible locations of the production centres. Likewise, envelopes will be also provided, with the following delivery address:

Gonvarri Steel Services y Gestamp Renewables
Comité de ética
c/ Prolongación de Embajadores S/N.
28053 Madrid.

GRI Renewable Industries
Comité de ética
c/ Ombú 6
28045 Madrid.

The Company guarantees the confidentiality of the complainant, who has a safe, confidential environment, where he/she may express themselves without fear of reprisals.

Irrespective of the internal management of this type of complaints, **ALL** of the complaints must be duly reported to the Ethics Committee, for purposes of assessment, follow-up and annual publication in the Reports to be submitted to the Company's Management.

Follow-up and measuring

The complainant will be timely informed of the developments of the investigation and its final resolution, as well as the disciplinary measures applied.

On a yearly basis, the Company will regularly carry out audits at the work centres, in order to monitor and measure the dissemination, communication and compliance with the Guide, in conjunction with, and using the same methods as, the audits established under the Code of Ethics and Conduct.

Annex

Decalogue of harassment prevention action

In our Company, we believe that personal dignity, the inviolable, inherent rights of the person, free development of the individual's personality, equal treatment and physical and moral integrity are fundamental rights of a person.

In order to prevent, discourage and punish behaviours that entail harassment at the workplace, the Company will instil values that promote equal treatment, respect, dignity and free development of the personality among all employees, that is, those currently joining the company's staff and those that are already part of it, by implementing the following measures:

- To communicate, spread, provide training and raise awareness with regards to sexual harassment and to disseminate the Code of Ethics and Conduct, as well as the Harassment Prevention Guide and Protocol, and its adaption to local and culture requirements in the countries in which we operate , to all employees in a regular manner.
- To use whatsoever means may be necessary to achieve that daily personal relationships between employees are polite enough and governed by good manners.
- To ban the use of dirty language, as well as jokes or offensive comments, irrespective of the means of communication employed.
- To ban attitudes consisting of insinuations, displays of a physical nature, gestures, glances, fondling, deliberate friction, etc. that may upset other employees.
- To endeavour to achieve the integration of newly-hired staff members, avoiding isolating attitudes, by means of a follow-up of the new employee, not only at the initial reception steps but also subsequently by raising the suitable awareness in this area from the very beginning of his/her professional activities.
- We echo the personal or cultural circumstances of the employee, which will be taken into account in order to help them to be integrated, by using all means available through the actions carried out by the Head of Human Resources in that respect..
- The Company will set out the suitable communication channels, media and resources, so that when encountering a situation of harassment, the harassed person may file the corresponding complaint.
- We guarantee the confidentiality of the harassed person and/or the complainant, who has a safe, confidential environment in which he/she can express themselves without fear of reprisals.



The conversation continues at



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www.gonvarri.com
www.gri.com.es
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