

Protocol of Action for the prevention and approach of sexual harassment at work

INDUSTRIAS TAPLA, S.L.

Produced by: GESEME

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INTRODUCTION

INDUSTRIAS TAPLA, S.L. has approved the present "Protocol of action for the prevention of harassment at work" (hereinafter "Protocol") with the commitment to avoid situations of sexual harassment, gender harassment and / or psychological harassment, as These are violations of dignity, harmful to the work environment and they also generate undesirable effects on people's health, morals, confidence and self-esteem.

In order to reach this goal, this Protocol defines the conduct to be prevented, as well as arbitrates the specific measures for such prevention and to make way to complaints or claims that may have been made by those who have been the object of such conduct. For this reason, an efficient and agile investigation procedure has been established and it will be launched when one of these behaviors is reported. This procedure will guarantee the confidentiality and protection of the identity of the affected person, as well as all those involved in the process.

1. STATEMENT OF PRINCIPLES

INDUSTRIAS TAPLA, S.L. is located in Carretera de Sabadell to Granollers Km 11, Lliçà de Vall. It is an industrial plant for the manufacture and commercialization of flocked technical products with research, development and innovation (R+D+I) solutions in the sealed of vehicles, with the use of flocked tape and under the Brand: taplatape flock, for tailor made solutions to any other application or market.

In order to guarantee the protection of the fundamental rights of the person and with a strong commitment to comply with the applicable legislation, it is necessary to prevent harassment at work and to prevent any behavior that may be considered as harassment in the labor and professional field.

Sexual harassment, gender harassment and psychological harassment are behaviors that are totally prohibited in **INDUSTRIAS TAPLA, S.L.** and are considered unacceptable in our organization.

Therefore, **INDUSTRIAS TAPLA, S.L.** is committed to:

- > Ensure that all people who have a direct relationship in the workplace, with **INDUSTRIAS TAPLA, S.L.** enjoy a respectful working environment in which the right to equal treatment, non-discrimination, dignity, privacy and integrity are respected at all times as fundamental principles.
- > Adopt the appropriate corrective and disciplinary measures and also protection measures to affected persons when these fundamental principles are broken.

2. SCOPE OF PROTECTION

The Protocol is applicable to the group of people who provide services in the work centers of **INDUSTRIAS TAPLA, S.L.** or those that work outside but are also part of the workforce of **INDUSTRIAS TAPLA, S.L.**

The scope of harassment, in any of its modalities, will be the center of the work in which develops the tasks assigned to the job post; consequently, if it happened outside of **INDUSTRIAS TAPLA, S.L.** it should be noticed that the situation is directly linked to work.

3. CONCEPTS AND PREVENTION MEASURES

3.1 DEFINITION OF BASIC CONCEPTS

3.1.1 Sexual Harassment

It is considered **sexual harassment** any behavior of sexual, verbal or physical nature **that has the purpose or effect of damaging the dignity of a person**, in particular when **an intimidating, degrading or offensive environment is created**.

Sexual harassment is different from freely accepted and reciprocal approaches, as sexual harassment is not desired by the person who is the object of such harassment.

3.1.2 Gender Harassment

Any **behavior based on the sex or sexual orientation of a person, with the purpose or effect of violating his/her dignity and creating an intimidating, degrading or offensive environment**.

3.1.3 Psychological harassment

The terms "mobbing," "moral harassment at work," or "psychological harassment at work," are used to describe a situation in which **a person or group of people exert a set of behaviors which are characterized by an extreme abusive and unfair psychological violence in a systematic and recurring way, over a long period of time on another person in the workplace, and that can cause damage to their dignity**.

It should be pointed out that certain hostile actions may occur punctually at work, although, in order to be constitutive of psychological harassment, it is required, (as it has already been stated) **to be systematic and constant actions, with sustained duration in time and headed to one person**.

Therefore, **situations of pressure or work conflicts should not be confused with psychological harassment. In the first case, we talk about situations of disagreement, since at work there may be clashes, discussions and eventual conflicts. Psychological harassment, on the other hand, consists of a malicious, systematic and sustained attack** against a person.

3.2 PREVENTIVE MEASURES

To prevent and avoid workplace harassment situations, **INDUSTRIAS TAPLA, S.L.** will disclose this Protocol by hanging it on the Server, in order to be accessible to the office staff, and at the Information Point for Operators.

This Protocol will be properly updated, with the aim that all members of **INDUSTRIAS TAPLA, S.L.** become aware of it, and also to become responsible of helping to ensure a work environment in which the dignity of all the people in the organization is respected

3.3 PROCEDURE OF ACTION IN CASE OF HARASSMENT

3.3.1 Complaint Procedure

The complaint will be made by the affected person or a third person who has knowledge about acts of sexual harassment, gender harassment and / or psychological harassment, who have to identify themselves.

It will be made by e-mail to the management committee who will provide the document "*Communication of harassment situation*" so that they can report the situation, using any means to make the complaint for the record. **It is required a written complaint.**

Regardless of the information provided in the complaint, the investigation will be carried out in any case, although it must be noticed that **the more information and detail the complaint, contains, the more efficient the investigation will be.** It is therefore suggested that the complaint contains, at least, the following detail:

- People involved
- Types of behavior
- Dates and places where it occurred
- Possible witnesses
- Identification of the potential victim of harassment

3.3.2 Confidentiality and Protection of Affected People

It is intended that the procedure is as agile and efficient as possible and the privacy, confidentiality and dignity of the persons affected are protected in all cases; In addition, an adequate protection of the victim in terms of safety and health will be considered; and also taking into account the possible physical and psychological consequences that may arise from the situation, giving particular attention to the working circumstances in which the presumed victim is located.

Throughout the procedure, strict confidentiality will be maintained and all internal investigations will be carried out tactfully, with due respect to either the complainant and the victim – who, in no case, will receive unfavorable treatment for this reason - as the accused, whose guilt shall not be presumed. **All persons involved in the process will have a confidentiality obligation, and will be identified in the file.**

3.3.3 Harassment Prevention Committee

This Committee will be composed by members of the following functions: Management, Human Resources and Prevention Service.

The Committee will study and evaluate each case, and they will have the right of access to all information and documentation for the resolution of complaints and its agreements will be adopted by a majority of its members. Its performance shall be governed by its internal rules, which will be approved by the Committee itself when they first meet.

The Committee is composed by the following persons:

- > **Management committee.** They can be reached in person, by e-mail or by phone.
- > **Human resources manager.** Can be reached by e-mail or by phone.
- > A labor risk prevention technician of the GESEME Labor Risk Prevention Service. Can be reached via email.

The competencies / responsibilities of this Committee are:

- Receive all complaints, claims, suggestions or inquiries regarding harassment situations.
- Investigate the cases of sexual harassment, gender or psychological harassment that arise, practicing any documentary evidence or interviews, and ensuring in all cases the strict confidentiality in this matter and an equal treatment to all people involved.
- Prepare a detailed report containing the corresponding proposal for measures to be taken.
- Submit this report within a maximum period of 2 months, although the principle of speed will be applied for its resolution, from the reception of the complaint, in order to adopt the proper measures to solve the problem and determine any disciplinary action.
A copy of this report will also be sent to the parties involved.
- Periodically follow up to each complaint, attaching to each report the actions undertaken.

In the event that any member of this Committee becomes involved in a harassment process or affected by a relationship of kinship or affection, friendship or enmity, of superiority or hierarchical subordination, or by any other type of direct relation to the affected person or the person accused, who may doubt his objectivity and impartiality in the process, will be automatically invalidated to take part in this particular process. If it is the person accused or the complainant, He will be invalid to take part in any other procedure until the resolution of his/her case.

3.3.4 Research

Each case will be treated in an individual way, affected people will be heard and supported at all times, as they may be experiencing sensitive moments, including isolation.

Interviews or other search techniques may be carried out with any of the persons involved, witnesses, or third parties considered to be able to provide useful information. The main objective of the interview is to know the situation of the people affected and, among other things:

- If there is or has been harassment at work, and what the characteristics were, what the motive was and in which phase it is, etc.
- Who is considered to be practicing this harassment situation and what hierarchical relationship exists.
- In which situations harassment occurs. If it happens in the presence of other coworkers and, if that is the case, how they react.
- If the case has been brought to the attention of a hierarchical superior, in which way (verbally or in writing) and what type of response has been obtained.
- How has the person's health been affected, including whether he or she has needed help from a specialist or if she or he has been sick in the past few months and for what reason..
- If other colleagues have or have had similar problems, requesting them additional information.

The interviews will be governed by the following rules:

- In the event of a joint interview with both the victim and reported one, it will only take place with their express permission..
- If any party requests a meeting or interview, it will be granted.
- All those involved will have the right to be assisted at all times by representatives or advisers.

3.3.5 Preparation of the Report

In order to prepare a report as complete as possible about the investigation process, the necessary proofs will be collected, including:

- Statements of affected people, involved people, witnesses, etc.
- Written statements (corporate e-mail can be accepted).
- Reports of the specialists who treat the affected person (in which case, the written authorization of the interested party will be required).
- Any other evidence that provides useful information to the process.

The report will include, as minimum, the following information:

- Case history (summary of the facts given by those involved).
- Summary of the interventions made and of the proofs obtained.
- Summary of the main facts.
- Conclusions and proposed measures.

3.3.6 Protection of the Health of the workers.

INDUSTRIAS TAPLA, S.L. will take the proper corrective actions in relation to harassment in order to ensure the right to the health protection of the members of its organization. Some of these measures can be:

- Psychological assistance to the affected person.
- Support to the affected person to reach his or her complete recovery in his/her workplace or in a different one.
- Ensure that inside the organization there is no reprisal against the person who reports or is reported, as well as those who witness, collaborate or participate in investigations of sexual harassment, gender harassment and psychological harassment.

3.4 PROTECTION OF VICTIMS

In the event that the authenticity of harassment is proved, in any of its kinds, and the imposed measure to the harasser does not mean that he will be fired. **INDUSTRIAS TAPLA, S.L.** will take the proper measures so that the harasser and the victim do not have to share the same working environment as long as it is possible. In these measures - which does not mean better or worse contractual conditions - the harassed person will get preferential treatment.

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3.5 DATA PROTECTION

Unauthorized disclosure of data in any of the included procedures will be considered a breach of the contract and it will be subject to disciplinary penalty.

APPENDIX 1

COMMUNICATION OF HARASSMENT SITUATION

This document is the one that **INDUSTRIAS TAPLA, S.L.** makes available to you in order to communicate the maximum of detailed information to proceed to the investigation of the situation of harassment that wants to be communicated.

1. People involved

- 2 Identification of the potential victim of harassment

- 3 Types of behavior

4. Dates and places where the behavior occurred

- 5 Possible witnesses

- 6 . Additional remarks
