





CIE *Automotive*

*Harassment Prevention and
Resolution Policy at CIE
AUTOMOTIVE*

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1. Introduction

This Prevention and Harassment Resolution Policy has been officially issued to identify, assess and propose solutions for personal relationships within the labor environment, which may lead to the onset of psycho-social disorders.

2. Purpose and Scope of Application

This Policy is designed to prevent harassment in the labor environment, and should it occur, ensure appropriate procedures are in place to tackle the problem and prevent its recurrence. These measures aim to ensure a harassment-free labor environment where everybody respects their colleagues' integrity and dignity in their professional and personal relationships.

The application of this Policy affects all Grupo CIE AUTOMOTIVE plants. Those plants with their own policy on this matter in place may apply their specific policies; nevertheless, they must ensure its alignment with the measures and procedures set forth herein.

3. Definitions

a) Moral harassment (Mobbing)

It is understood as any abusive or psychologically violent behavior sustained over a period of time against a person in the labor environment, displaying persistent conducts, actions, orders or words aimed at discrediting, being inconsiderate or isolating a person to make them quit their job, while causing progressive continuous damage to their dignity or mental integrity.

An aggravating factor is when the person harassing is in a position of hierarchical authority in the company structure over the alleged victim.

There are three forms of labor environment moral harassment:

- Downward: when a manager allegedly harasses his/her subordinate;
- Horizontal: when harassment occurs among co-workers where the harasser seeks to hinder the victim's work, to damage the latter's professional image and even claim the victim's professional achievements for themselves.
- Upward: when a bullying subordinate harasses his/her superior.


b) Sexual Harassment

Sexual harassment is understood as any verbal, non-verbal or physical conduct of a sexual nature designed to attack a person's dignity, in particular creating an intimidating, hostile, degrading, humiliating or offensive environment.

c) Gender Harassment

When somebody harasses another person in relation to their gender to attack said person's dignity creating an intimidating, hostile, degrading, humiliating or offensive environment.

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4. Preventive Measures

The following measures have been implemented to prevent harassment:

- Observing the principle of zero tolerance with this behavior, using, if necessary, disciplinary measures envisaged under applicable labor law;
- Establishing the principle of joint responsibility whereby all employees should be vigilant of behavior at work; and
- Defining report programs fostering communication and approachability at any organization level.

5. Action Plan

We guarantee the procedure described below will be activated when harassment is reported.

This action plan is governed by the following principles which must be observed at all times:

- ✓ Guarantee confidentiality, protection of privacy and dignity for those involved; and in any event, ensure the identity and personal circumstances of those reporting are protected.
- ✓ Priority and urgent resolution.
- ✓ A comprehensive inquiry into the events conducted by qualified specialists, where needed.
- ✓ Guarantee of action implementing any measures needed, including, where necessary, any disciplinary measures against the person or persons whose conduct is proven to be harassment, as well as regarding those who falsely accuse or maliciously report somebody.
- ✓ Indemnity against retaliation, ensuring nobody will receive any adverse treatment or suffer a negative impact as a result of filing a claim or testifying in any way to prevent harassment and instigate this procedure (notwithstanding any disciplinary measures which may be mediated in the face of false allegations of harassment).
- ✓ Guarantee the alleged victim can keep his/her job in the same conditions should he/she so wish.

a) Initiation of procedure

The procedure will be initiated by the plant Human Resources department (hereinafter, "HR") or via the ethics channel at Grupo CIE AUTOMOTIVE.


Therefore, a case of harassment can be reported, always in writing, by:

- The alleged victim or anybody aware of the situation;
- to HR of the specific plant, using different means of communication implemented by each plant HR department and/or via Appendix I to this Policy; or
- Via the corporate ethics channel at CIE AUTOMOTIVE:
<https://www.cieautomotive.com/canal-de-denuncias>

b) Investigation

An investigation will be conducted by the plant HR managers on receiving the information in the first place.

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Should the corporate ethics channel receive the information, CIE AUTOMOTIVE Compliance Department will lead the investigation, notwithstanding delegation of the entire case or part thereof, should involvement of personnel closer to the alleged harassment may be considered convenient.

Those participating in the investigation are bound by professional secrecy regarding any information they may have access to during the case handling. Non-compliance with this obligation may lead to a sanction.

Exceptionally, and in the event of any particular circumstance which might occur, the file investigation may be assigned to another person appointed by the bodies investigating the procedure.

c) Preliminary Procedure

As soon as harassment is reported, a preliminary procedure is automatically launched aimed at immediate resolution of the problem.

During this stage of the procedure, the person leading the investigation will interview the parties to clarify the events and reach a solution acceptable to both parties.

Once started, and in the event of the harassment claim not being solved by said person within fifteen calendar days from its commencement, this will automatically lead to the initiation of formal proceedings.

d) Formal Proceedings

The formal proceedings will start with the investigating party opening an informative case file.

To do this, any evidence deemed necessary to ascertain the events reported will be gathered and the parties involved will be entitled to a hearing.

A report containing: a description of events reported, concurring circumstances, repeated conduct and degree of impact on the alleged victim’s labor obligations and environment, must be drafted as soon as possible and within 30 calendar days.


In any event, such report must cover whether the investigating party agrees or disagrees with the events reported, explaining which events have been objectively accredited according to the inquiries made.

e) Cautionary Measures

During the case file proceedings, and at the request of the investigating party, the plant Management may implement any cautionary measures deemed necessary which will not be detrimental to the labor conditions of those involved, to immediately cease harassment.

f) Assistance for the parties

During the case file proceedings, the parties involved can receive assistance and be accompanied by a person of trust who will not disclose any information he/she may have access to whatsoever.

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This person of trust may be present when declarations are taken and in communications sent by the investigating party to the parties involved.


g) Case File Closure

Taking into account the severity and magnitude of the events proven, the investigating body of the case file will adopt the necessary corrective measures and impose any disciplinary sanctions pursuant to Law and/or applicable agreement.

In the event of determining the absence of harassment in any form, likewise the malicious intent of a claim, the corresponding disciplinary measures will be implemented.

In any event, the department responsible for dealing with said case file (either the plant HR as the initial recipient of the communication, or any other person delegated at the plant, if any, in other corporate departments) will submit the final informative case file or a simple form included in Appendix II to this Policy, to the following corporate departments: Compliance (compliance@cieautomotive.com) and HR (hr@cieautomotive.com) so the case of harassment can be monitored throughout Grupo CIE AUTOMOTIVE

A report form which can be used at plants to inform the above corporate departments is included in Appendix II attached to this document.

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ANNEX I: Harassment Report

Applicant's name and Surname:


Department / division:

Brief summary of the situation:

Applicant's signature

Received by HR

Date:

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ANNEX II: Harassment Report

Plant:

Department / division:

Brief description of the situation by an anonymous source and decision made by the investigating body:

Date: