

Protocol for prevention and action against workplace harassment

NEUTRON INSIGHTS, S.L.

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1. INTRODUCTION

Neutron Insights S.L., hereinafter "the company", committed to the well-being of its team, establishes this protocol to prevent and respond to any situation of workplace harassment. This document defines the prevention measures, response procedures, and responsibilities of each member of the company in managing such situations.

Likewise, the company expresses its rejection of all forms and types of workplace harassment, regardless of who the victim or harasser may be. Consequently, the company assumes a firm commitment to prevent, raise awareness, and take action as soon as it becomes aware of any instance of workplace harassment.

Any behavior or conduct of this nature is therefore expressly prohibited and may be considered, independently of what is established in criminal legislation, a very serious offense. Such behavior may give rise to the sanctions provided by Royal Legislative Decree 2/2015, of October 23, which approves the revised text of the Workers' Statute Law, and this Protocol, for such conduct.

Any person providing services to the company, regardless of the nature or legal character of their relationship with it, undertakes to prevent workplace harassment. All available means must be provided to prevent, avoid, and, where applicable, detect and eliminate any situation of harassment in the workplace.

Consequently, the company's Management commits to preventing and, where necessary, sanctioning workplace harassment in accordance with the provisions of this Protocol, with

the appropriate guarantees and in compliance with constitutional, labor, and administrative regulations, as well as declarations of principles and fundamental rights at work.

In all cases, the assistance and protection of victims will be guaranteed, following the principles of confidentiality, respect, professionalism, objectivity, impartiality, and promptness.

2. FIELD OF APPLICATION

The field of this protocol extends to every worker of the company. A “worker” is understood to be any person who has a labor relationship with the company and is under its management authority. It also applies to any person who has a contractual relationship with the company through service provision agreements or other legal forms, as well as those linked to the company through educational or R&D+i collaboration agreements.

From an objective standpoint, it covers any behavior that constitutes workplace harassment.

3. DEFINITIONS

When the term "**harassment**" is used, it generally refers to one of the following three definitions:

- **Workplace harassment** (or mobbing): Any repeated, abusive, or degrading behavior that undermines a person's dignity in the workplace.
- **Sexual harassment:** Any unwanted verbal or physical behavior of a sexual nature that creates an intimidating or humiliating environment.
- **Gender-based harassment:** Any discriminatory behavior based on a person's sex that affects their dignity or working conditions.

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Below is a list of "typical" harassment behaviors, according to Technical Criterion 69/2009 on the actions of the Labor and Social Security Inspectorate regarding harassment and violence in the workplace:

Conduct considered as workplace harassment	Conduct that is not workplace harassment, without prejudice to other offences
• Continuously leaving the worker without actual tasks or isolating them without any justified reason. • Giving orders that are impossible to fulfill with the resources available to the person in their role. • Assigning tasks that are useless or have no productive value. • Retaliatory actions against workers who have filed complaints, claims, or lawsuits against the organization, or against those who have supported such individuals. • Repeatedly insulting or belittling a worker. • Publicly reprimanding a worker repeatedly in front of others. • Spreading false rumors about a person's work or private life. • Publishing or circulating messages or audiovisual content (images, memes, etc.) that attack the dignity of the worker, creating a humiliating or hostile environment. • Recording degrading images that infringe on the privacy of employees. • Any unlawful processing of personal data deliberately intended	• Significant changes to working conditions without cause and without following the legally established procedure. • Pressuring workers to work overtime or perform specific tasks. • Tyrannical or authoritarian behavior directed indiscriminately at several employees. • Conflicts arising during strikes, protests, etc. • Isolated or repeated offenses directed by various individuals without coordination. • Reprimands that do not involve personal disqualification when work is performed poorly. • Personal or union-related conflicts.

to create a hostile work environment for employees.	
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4. GUIDING PRINCIPLES

The protocol and procedures outlined in this plan are based on the following principles:

- **Zero tolerance:** Neutron Insights will not tolerate any form of harassment.
- **Confidentiality:** The identity of complainants and affected individuals will be protected.
- **Diligence and promptness:** All complaints will be investigated swiftly and effectively.
- **Non-retaliation guarantee:** No person will suffer negative consequences for filing a complaint in good faith.

5. PREVENTIVE MEASURES

The aim of the preventive measures is **to avoid** situations from escalating into cases of harassment and to prevent uncomfortable circumstances for workers that, while not amounting to harassment themselves, could evolve into conduct that does. These measures are also intended **to influence** the work environment by discouraging a culture of impunity or helplessness, **and to inform, advise, and raise awareness**—since in many cases, potential victims simply want the situation to stop or may not even realize what is happening to them.

In addition to the company-wide dissemination of this protocol and the appropriate training for those responsible for or involved in handling any complaints, we offer the following recommendations to all staff in order to help prevent harassment situations:

Recommendations for All Staff	Additional Recommendations for Staff Managing Teams
• If you feel that a certain type of behavior is humiliating, inappropriate, or embarrassing, clarify the situation with the person responsible as soon as possible and try to resolve any discomfort through dialogue. • React immediately and set boundaries politely but firmly. • In certain circumstances, it may be advisable to speak about the situation with a supervisor or consult with the bodies involved in the procedure. • In cases where there are doubts about the nature of the situation, it may be appropriate to seek advice on whether or not to initiate formal proceedings. In such cases, either the person who feels harassed, as a witness to such situations or management staff may have recourse to the authorities involved in the proceedings. • If the unwanted behavior persists, begin to document the incidents in writing and seek witnesses who can confirm what happened. • If you witness a harassment situation, don't hesitate to ask how it can help. • If you are experiencing workplace harassment or become aware of it, every worker has a duty to report it, as only then can appropriate	• Address any queries that may arise and listen without judgment to the person approaching you. • If the complaint is not submitted through the designated communication channels or is addressed to individuals who are not responsible for handling it, you are required to immediately forward it to the person responsible for managing the ethics channel, according to the topic. That person will register it properly in the system if there are signs of a possible breach and/or irregularity. • Use interviews and evaluation meetings as an opportunity for early detection. • Some warning signs that should be taken seriously include repeated sick leaves, irritability, nervousness, fatigue, isolation, or a sudden decline in performance. • Every manager is obligated to pay attention to and process, where appropriate, any reports of alleged workplace harassment that fall within their scope of responsibility.

measures be taken to prevent recurrence and repair the consequences for the individuals involved and the organization itself.	
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6. PROCEDURE FOR ACTION

Filing a Complaint: Any person who considers themselves a victim or witness of harassment may file a complaint with **the Sole Administrator**, who will be responsible for initiating the investigation process.

To encourage reporting, the complaint may be submitted **in writing** (via email, letter, etc.) or **verbally** in a face-to-face meeting.

Initial Evaluation: The Administrator will assess the complaint and determine whether a formal investigation is necessary.

Internal Investigation: An investigation will be conducted while respecting the confidentiality of all parties involved. The affected person, the alleged perpetrator, and potential witnesses will be interviewed.

Resolution and Corrective Measures: Based on the findings of the investigation, appropriate actions will be taken. These may include disciplinary sanctions, training measures, or organizational changes.

7. SANCIONES Y CONSECUENCIAS

Confirmed cases of harassment may result in disciplinary measures, including warnings, suspensions, or, in serious cases, termination of the employment contract.

Furthermore, engaging in conduct that constitutes workplace harassment may lead to the following types of liability, depending on the circumstances of each case:

- Disciplinary liability
- Criminal liability
- Administrative liability in terms of data protection
- Civil liability, arising from material or moral damages

Aggravating circumstances will include abuse of a position of hierarchical superiority and the repetition of offensive conduct after the victim has made use of the resolution procedures. Premeditation—defined as the use of means or methods intended to ensure the perpetrator’s impunity—will also be considered an aggravating factor.

All company personnel are subject to the sanctions established in the Workers' Statute and other applicable legal regulations.

8. MONITORING AND REVIEW

This protocol will be reviewed annually by the company’s management to ensure its effectiveness and compliance with current legislation.

The company’s management will oversee the control, monitoring, and evaluation of the implementation of this Protocol, with the aim of verifying its practical effectiveness in detecting and eliminating workplace harassment situations. If any shortcomings in its application are identified that hinder the achievement of its objectives, modifications will be proposed through the appropriate procedures.

Should any higher-ranking legal or contractual regulations arise that affect the content of this Protocol, the signatories commit to its immediate adaptation.

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This document reflects Neutron Insights' commitment to a safe, harassment-free work environment based on mutual respect.