

PROTOCOL FOR ACTION IN THE DETECTION AND ASSESSMENT OF HARASSMENT BEHAVIOR CASES

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Contents

- 1 DECLARATION OF PRINCIPLES
 - 2 PURPOSE AND SCOPE OF APPLICATION
 - 3 DEFINITIONS OF HARASSMENT CONDUCT
 - 4 MEANS FOR DETECTION AND IDENTIFICATION
 - 5 GENERAL PROCEDURE
 - 5.1 Preliminary Phase – Query or Complaint
 - 5.2 Processing Phase
 - 5.3 Final Phase – Termination
 - 5.4 Follow-up Phase
 - 6 DISSEMINATION AND REVIEW
 - 7 ENTRIES INTO FORCE
-

1. DECLARATION OF PRINCIPLES

Harassment conducts in its various forms—moral, sexual, racial, etc.—is contemplated in the Spanish Constitution and in the Workers’ Statute. Furthermore, in the NATIONAL COLLECTIVE AGREEMENT FOR THE AUDIOVISUAL PRODUCTION INDUSTRY, they are expressly classified as very serious offences:

“Physical, verbal or any other type of offences of a sexual nature, carried out against any worker or any other person related to the company. It shall be considered an aggravating circumstance when such misconduct is exercised from positions of hierarchical superiority” (art. 56.d. CC),

“Abuse of authority, understood as the conduct of a person who, taking advantage of his or her hierarchical superiority, inflicts degrading treatment on a subordinate, deviating from the purposes for which the authority is granted” (art. 56.d. CC),

“Serious mistreatment in word or deed and lack of respect and consideration towards managers, colleagues, subordinates or other persons related to the company, of a very serious nature” (art. 56.f. CC),

“Sexual harassment, gender-based harassment and moral harassment, meaning any conduct of a sexual nature or any other behaviour that affects the dignity of the person at work, including conduct by superiors and colleagues, provided that such conduct is unwanted, unreasonable and offensive to the recipient, or creates an

intimidating, hostile or humiliating work environment for the person who is the target of it; or when the refusal of a person to submit to such conduct is used as a basis for a decision affecting that person's access to vocational training and employment, continuation of employment, salary, or any other decision relating to the content of the employment relationship.” (art. 56.l. CC).

Due to the activity carried out by **GRUPO BUENDÍA ESTUDIOS**, composed of the companies:

1. **BUENDÍA ESTUDIOS, S.L. – CIF B01666478**
2. **BUENDÍA ESTUDIOS CANARIAS, S.L. – CIF B67861211**
3. **BUENDÍA ESTUDIOS BIZKAIA, S.L. – CIF B72490246.**

the personnel comprising it is an essential factor in its corporate philosophy and, consequently, it is indispensable to ensure a working environment in which the dignity and freedom of all persons working therein is guaranteed.

Being treated with dignity is a right of every person. And this right is clearly protected both in the corporate sphere and in Spanish labour law.

However, developments in society and the size of workplaces recommend establishing mechanisms for the prevention and immediate detection of situations that may endanger this right through harassment in any of its forms.

Therefore, based on the collective involvement in this matter, the guiding principles of the Group are summarised as follows:

1. The Management of GRUPO BUENDÍA, regardless of its legal obligations, shall provide a channel for the communication and verification of situations that may harm or endanger the dignity and integrity of all employees, through an External System Manager designated for this purpose:
Consulting Normativo, S.L.U.
2. GRUPO BUENDÍA will not tolerate situations of moral or sexual harassment in the areas under its responsibility.
3. The right to privacy and the presumption of innocence of every worker, both complainant and respondent, shall be guaranteed.
4. Initial training for access to the company shall expressly include this fundamental duty and strategic objective of work organisation.
5. Workers’ representatives shall expressly convey the values of respect for individual dignity and the defence of an appropriate working environment.
6. All workers are responsible for helping to create a working environment in which everyone’s dignity is respected.

2. PURPOSE AND SCOPE OF APPLICATION

The purpose of this Protocol is to establish a method which, with the necessary safeguards and taking into account the individual and their inherent rights, is capable of channelling and managing situations that might constitute a breach of the principles defined in Section 1 and might constitute conduct as described in Section 3, within the framework of work-related interpersonal relationships.

This Protocol shall apply to all employees of BUENDÍA ESTUDIOS, S.L., BUENDÍA ESTUDIOS CANARIAS, S.L. and BUENDÍA ESTUDIOS BIZKAIA, S.L.

3. DEFINITION OF HARASSMENT CONDUCT

Moral harassment

Moral harassment is understood as: The set of acts carried out continuously over time with the purpose of attacking a person's dignity, self-esteem and standing at work, particularly by creating an intimidating, hostile, degrading, humiliating or offensive environment.

Harassing conduct may be subtle and varied, arising from seemingly irrelevant facts, and therefore it is necessary to assess the existence of a pattern of behaviour ultimately aimed at destroying the victim's self-esteem and their consideration by colleagues, managers or subordinates, thus affecting the working environment.

Harassment conduct may occur individually or collectively, actively or passively, and must persist over time in order to deteriorate the working environment and generate hostility, contempt or isolation.

Sexual harassment

Sexual harassment is understood as: Any conduct consisting of words, gestures, attitudes or specific acts, carried out in the workplace, directed at another person with the intention of obtaining an unwanted sexual response from the victim.

Its work-related nature is presumed when occurring within the organisation of the company, as well as when the conduct is related to employment conditions, training or promotion at work.

Harassment generally implies ongoing conduct over time, although a single unwanted episode of particular severity may constitute sexual harassment.

4. MEANS FOR DETECTION AND IDENTIFICATION

System Manager (Consulting Normativo, S.L.U.)

Given the discretion required for these situations, and the different implications they may have on the privacy of the person affected, the existence of an external, specialised, independent and professional service is considered essential for assessing possible harassment conduct detected or reported by the worker.

For this purpose, the BUENDÍA Group designates as **System Manager**:

CONSULTING NORMATIVO, S.L.U., an external entity specialised in regulatory compliance and investigation systems.

All communications relating to possible harassment conduct must be channelled through:

- Internal reporting channel (available at the link on the website):
<https://canaldenuncia.com/@BUENDIAESTUDIOS/informar>
- Or via email:  **denuncia@canaldenuncia.com**
- Telephone/Instant Messaging (WhatsApp, Telegram):  **633300600**

The System Manager shall perform its duties with full independence from the BUENDÍA Group, having complete autonomy to conduct this procedure and being able to request the collaboration of any department of the company when deemed necessary.

Any worker may contact the System Manager through the above-mentioned means, providing any information they consider relevant for the initial assessment.

5. GENERAL PROCEDURE

This section further develops what is established in the reporting management procedure, with Consulting Normativo, S.L.U., in its capacity as System Manager, being the entity responsible for processing, managing and accessing communications relating to possible harassment conduct in the BUENDÍA Group.

5.1 PRELIMINARY PHASE – Query or Complaint

Once the System Manager receives communications (via the email address denuncia@canaldenuncia.com or any other authorised channel) regarding possible harassment conduct at work, Consulting Normativo shall carry out an initial assessment to determine whether there are sufficient indications of harassment as defined in this protocol.

The System Manager may request additional data or the names of persons who can provide direct information about the events.

Within a maximum of **three working days** from receipt of the query, complaint or communication, the System Manager shall issue a **preliminary assessment**, proposing, where appropriate, possible courses of action.

If sufficient indications of alleged moral or sexual harassment are observed, the affected person shall be offered the processing of an **informative file**.

Acceptance by the worker will lead to the immediate opening of the informative file, aimed at establishing the facts. Statements will be requested from any individuals considered necessary for full understanding of the situation.

If the affected person chooses not to proceed, the System Manager shall record the withdrawal, guaranteeing confidentiality.

If the preliminary assessment does not reveal sufficient indications, this circumstance shall be communicated in writing, with justification, within a maximum of **seven days**.

5.2 PROCESSING PHASE

The informative file shall be conducted under the principles of speed and confidentiality and must be resolved within **ten days**. The System Manager may request an extension of an additional 3 days (i.e., up to a maximum of 13 days to issue its report and conclusions). Should this not be possible, the final report must state the reasons for the delay.

The General Management and the Prevention Committee (if applicable) shall be informed solely of the commencement of the proceedings, ensuring confidentiality at all times.

During the processing of the file, and depending on the results of the preliminary phase, the adoption of temporary measures may be proposed if necessary, until the investigation is completed, following consultation with the Human Resources Department.

Anyone voluntarily participating in the instruction of the file must respect the confidential nature of the proceedings, as they directly affect the privacy and honour of the persons involved. The legitimate rights of both the complainant and the respondent must always be respected.

Workers' legal representatives (if applicable) must collaborate in verification efforts if required in the complaint or if requested by the System Manager, maintaining their duty of professional secrecy.

5.3 FINAL PHASE – Termination

The System Manager, Consulting Normativo, S.L.U., shall issue a **final report** with the conclusions of the informative file, which shall be sent to the Management of the BUENDÍA Group.

The BUENDÍA Management, once the conclusions of the System Manager have been received, shall adopt the decisions it considers appropriate within **three working days**, being the only authority empowered to decide on the matter. The adopted decision shall be communicated in writing to the victim, the accused person and the investigating committee, all of whom must maintain confidentiality regarding the information accessed.

If the report concludes that harassment has not occurred, or that verification of the circumstances has not been possible, the file shall be archived, with no negative consequences for the parties involved.

If indications of sexual or moral harassment are confirmed, the Human Resources Department shall take the appropriate actions. For the purpose of calculating the time limits for disciplinary prescription, the date of the request shall be considered the date of the company's knowledge of the facts.

The System Manager may suggest changes in work organisation to avoid friction between the affected parties.

Anyone participating in the procedure shall formally commit to confidentiality and to respecting the rights to honour, dignity and the presumption of innocence of all parties involved. Failure to process complaints submitted by an employee to the Internal Audit Unit may be considered an infringement under applicable legislation.

5.4 FOLLOW-UP

Once the file has been closed, **and within a period not exceeding thirty calendar days, the System Manager (Consulting Normativo, S.L.U.) will carry out a follow-up on the agreements adopted, that is, on their implementation and/or the outcome of the measures taken.**

Based on the results of this follow-up, an appropriate report will be drawn up, which will include the measures to be adopted in the event that the facts that led to the procedure continue to occur, and will also analyse whether the proposed preventive and disciplinary measures have been effectively implemented.

The report will be sent to the company's management, to the Legal Representation of Workers (RLT), and to the person responsible for occupational risk prevention, observing the precautions indicated in this procedure regarding the confidentiality of the personal data of the parties involved.

6. DISSEMINATION AND REVIEW

To ensure the widest dissemination and effectiveness of this prevention and resolution mechanism, the protocol shall be communicated through the internal communication channels defined in the specific communication plan.

The Company Management and the Prevention Committee shall evaluate its functioning **twelve months** after implementation, with the aim of proposing any modification that may improve the achievement of its objectives.

7. ENTRY INTO FORCE

This Protocol has been approved by the Boards of Directors of:

1. BUENDÍA ESTUDIOS, S.L.
2. BUENDÍA ESTUDIOS CANARIAS, S.L.
3. BUENDÍA ESTUDIOS BIZKAIA, S.L.

and shall enter into force from the moment of its approval, with binding effect for all its recipients.

This version also incorporates the adaptation of the section concerning the Means for Detection and Identification (24.11.2025), replacing the former internal SERI with the **System Manager** designated as **Consulting Normativo, S.L.U.**, with the single channel:

 **denuncia@canaldenuncia.com**

Thus, ensuring that the investigation of harassment conduct is carried out through an external, independent, specialised and legally compliant system, guaranteeing the protection of the fundamental rights of all affected persons.