

## POLICY ON UNACCEPTABLE BEHAVIOURS

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*Policy approved by the Board of Director of Lorca Telecom, S.A. at its meeting of September 29<sup>th</sup>, 2022.*

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## 1. INTRODUCTION

The Board of Directors has approved the Code of Ethics as the ultimate representation of the guiding values at LORCA TELECOM BIDCO, S.A. and the companies of its Group (hereinafter MASMOVIL or the MASMOVIL Group) and is totally committed to ethical values and values of integrity in all areas.

Within the scope of the Code of Ethics, this Policy develops the rules of conduct applicable to all MASMOVIL employees regarding any undesirable behaviour of a moral, psychological or physical nature.

The purpose of this policy is to prevent, detect, correct and discipline this type of conducts, which represents an attack on privacy, dignity, freedom, health, safety, equality and non-discrimination and therefore an obstacle to the smooth running of a healthy and ethical workplace environment, given that this type of conduct leads to undesirable consequences and effects on:

- The people who suffer it and may affect their health (deeming this to be physical, mental and social well-being, and not just lack of illness).
- The working environment and may interfere in or condition the relationships between people close to these facts, without needing to suffer it directly.
- The Company, when the aforementioned consequences impact the organisation and the daily operations of the area in which it takes place and those it is linked to, and may undermine the efficiency and negatively affect the image of the company, in addition to the possible legal consequences.

Therefore, this Policy aims to protect the fundamental rights of the workers and promote the values of respect among the workforce, as well as to create a cordial working environment which fully enables the workers' talent and abilities to develop, and to put in place the means to prevent, detect and solve any cases of harassment, understanding that each and every one of us who are members of MASMOVIL are obliged to respect this basic principle as a standard for co-existence in our organisation.

## 2. DEFINITIONS

- **Moral and psychological harassment**

Any degrading or disparaging treatment of a person, with the aim of destabilising them emotionally and psychologically, constitutes harassment.

Harassment undermines people's dignity and moral integrity. In this respect, the reiterated performance of acts of psychological victimisation such as excessive control, as part of any labour activity, which humiliates the person who is suffering it, by imposing situations that offend their dignity or that attempt to demean their honour or professional prestige, is deemed workplace harassment (also known as “mobbing”).

By way of example, the following conduct which is identified with the following patterns of behaviour is deemed workplace harassment.

- a) Preventing appropriate communication by the victim in their working environment, for example by changing their job function or location in order to isolate the worker from the rest of the employees, etc.
- b) Preventing the victim from establishing social contacts in the company, for example by not speaking to the worker, deliberately ignoring them, forbidding other workers to communicate with them naturally, or not inviting them to company's social events that the rest of their colleagues do attend.
- c) Discrediting the victim's personal reputation, which includes acts such as ridiculing the victim, spreading rumours about their personal and private life, ascribing any type of problem to the victim among their colleagues, imitating the victim, criticising their gender, race, religion, social condition, ideology or nationality, or disparaging the way they dress or their personal hygiene.
- d) Discrediting the victim's professional reputation by continually calling into question the work they are doing, or delegating impossible or manifestly useless tasks to them, limiting or preventing their career progression systematically or by not summoning them to attend courses or training that are usual for the rest of their colleagues at the company, or assigning them tasks for lower level staff or which are ridiculous for their professional level.
- e) Conduct which has a detrimental effect on the psychic or physical health of the worker. This includes threats, suggestions regarding his/her sexual orientation, verbal or physical aggression, or ordering the worker to undertake hazardous work.

- **Sex-based and sexual harassment**

Sexual harassment is a conduct of a sexual nature in the workplace, which causes the person to feel offended, humiliated and/or intimidated. It is a behavior based on sex, unpleasant and offensive to the person who suffers it. For it to be sexual harassment, the confluence of both negative aspects is necessary: unwanted and offensive. Sexually charged behavior is characterized by physical contact and innuendo, sexual observations, display of pornography, and sexual, verbal, or factual demands. This type of conduct can be humiliating and can be a health and safety problem; is discriminatory when the victim has sufficient reason to believe that his refusal could

cause problems at work, in recruitment or promotion, or when he creates a hostile work environment.

### 3. PROCEDURE FOR ACTION

Both the affected person and any employee who is aware of the existence of any situation of those described in the previous point, must inform the Group's Compliance Officer through the communication channels enabled for this purpose (canaletico@masmovil.com, corporate web page or intranet), who will initiate the corresponding investigation according to the provisions of the Compliance Officer and Ethics Channel Statute and to the applicable internal protocols.

Such notification will give rise to the immediate opening of an internal investigation, especially aimed at establishing the facts and preventing the continuation of the harassment reported, if necessary, for which the appropriate measures for the purpose will be brought together. It will be the responsibility of the Compliance Officer, in coordination with the CEO, to ensure the objective and independent nature of the process, taking particular care to ensure that there is no interference in the investigation process.

The procedure will be carried out under the principles of urgency, confidentiality and respect for the parties involved.

As a precautionary measure prior to the conclusion of the procedure, the company may decide to separate the reporting party and the person being reported, provided this measure does not mean, in any case, any change in working conditions to the detriment of the reporting party.

In the investigation to be carried out, no more formality will be observed than that of giving all those involved an opportunity to make comments in an interview, and any procedures deemed conducive to the clarification of the facts will be performed and any people deemed necessary due to their technical qualifications will be involved in the investigation.

All those acting will maintain absolute confidentiality and discretion regarding this process, which must be conducted within a maximum period of 15 working days, due to it directly affecting people's privacy and repute, unless there are any reasons that affect the meeting of this deadline in which case the deadline may be extended for the period deemed necessary.

The conclusion of the process will be reported to the Ethics Committee, which, in the case that the reported conduct has been confirmed, will give rise, among other measures and provided that the individual is within the scope of MASMOVIL's management and organisation, to a sanction to be imposed by the Human Resources Department for serious or very serious misconduct. In the event that the individual is outside the scope of MASMOVIL, the corresponding action will be taken to defend the Company's interests.

#### 4. VERSION HISTORY

<b>Current version</b>	2.0	
<b>Log Changes</b>	<b>Date</b>	<b>Version</b>
	25/07/2018	1.0
	29/09/2022	2.0