PROTOCOL FOR THE PREVENTION AND INTERVENTION AGAINST SEXUAL AND/OR GENDER-BASED HARASSMENT, PROTECTION OF LGTBI PEOPLE AGAINST HARASSMENT AND VIOLENCE AND OTHER CONDUCT AGAINST SEXUAL FREEDOM

NG-RHS-004

LALIGA

DO THE RIGHT THING ALWAYS.

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1. INTRODUCTION.

LA LIGA NACIONAL DE FUTBOL PROFESIONAL (hereinafter referred to as LALIGA) and the representation of workers (hereinafter referred to as "RT"), are aware of the need to protect the fundamental rights of individuals and especially their dignity in the workplace. Both the culture and values of LALIGA have the primary objective of preserving health and safety at work and respect for the people who make up the company, ensuring a working environment that prohibits the commission of crimes and other conducts against sexual freedom, with particular emphasis on sexual harassment and harassment based on sex, as well as the protection of the LGTBI collective against harassment and violence, including those committed in the digital environment, in accordance with the inspiring principles of international, European and national regulations.

The physical and moral integrity, the consideration due to the dignity, privacy and honor of persons and equal treatment are rights that are recognized in articles 10, 14, 15 and 18 of the Constitution, articles 4 and 17 of the Workers' Statute, articles 7, 8 and 48 of Organic Law 3/2007 on Effective Equality of Women and Men, and Royal Decree 901/2020, October 13, which regulates equality plans and their implementation and their registration and amends Royal Decree 713/2010, of May 28, on the registration and deposit of collective bargaining agreements, as well as the right to health protection for all workers as set forth in Law 31/1995 on Occupational Risk Prevention, among others.

The Spanish Constitution recognizes as fundamental rights the dignity of persons, the inviolable rights inherent to them, the free development of personality (article 10.1), equality and non-discrimination on grounds of sex in the broad sense (article 14), the right to life and to physical and moral integrity, as well as the right not to be subjected to degrading treatment (article 15), the right to honour, to personal and family privacy and to one's own image (article 18.1). Article 35.1 of the Constitution incorporates, in turn, the right to non-discrimination on the basis of sex in the field of labour relations.

Organic Law 3/2007, of March 22, 2007, for the effective equality of women and men, takes a major step forward by expressly prohibiting sexual harassment and harassment based on sex, as well as defining these behaviours (Articles 7, 8, 48 and 62).

Article 48 of the aforementioned Organic Law establishes that companies must promote working conditions that prevent the commission of crimes and other conduct against sexual freedom and moral integrity at work, with special emphasis on sexual harassment and harassment based on sex, including those committed in the digital environment.

After the publication, last October 9, 2024, of the Royal Decree that develops Article 15 of Law 4/2023 for the real and effective equality of trans people and for the guarantee of the rights of LGTBI people, the obligation to have a protocol against violence and harassment of LGTBI people is incorporated. This obligation, according to its article 8.4 last paragraph, is fulfilled by incorporating to the general protocol against sexual and gender-based harassment of LALIGA, the measures for LGTBI persons, extending it specifically to include them.

It also imposes the obligation on the company and the RT to negotiate the measures that may be established against sexual harassment and harassment based on sex, such as the development and dissemination of codes of good practice, the implementation of information campaigns or training activities.

The same article 48 of the Organic Law establishes in its number 2 the obligation of the workers' representatives to contribute to prevent the commission of crimes and other conducts against sexual freedom and moral integrity at work, with special attention to sexual harassment and harassment based on sex, including those committed in the digital environment, by raising awareness of the workers against it and informing the company management of the conducts or behaviours of which they have knowledge and that could lead to it.

Taking into account the time elapsed since the approval of its previous Protocol for the prevention and treatment of sexual harassment and harassment based on sex at work, and the need to incorporate measures to protect the LGTBI collective against harassment and violence, LALIGA and the RT have agreed to review and update the text by approving a new Protocol for the prevention and treatment of sexual harassment and harassment based on sex, and the protection of the LGTBI collective against harassment and violence at work, reinforcing their commitment to ensure a safe working environment, free of harassment.

In the above sense, LALIGA and the RT are firmly committed to prevent and avoid the occurrence of labour situations that threaten sexual freedom, especially sexual harassment and/or harassment based on sex, as well as harassment or violence based on sexual orientation; gender expression or identity; gender diversity, as established by current legislation.

In order to continue fulfilling this commitment, LALIGA implements a new procedure for prevention and intervention against sexual harassment and/or harassment based on sex and other behaviours against sexual freedom at work, especially sexual harassment and/or harassment based on sex, and the protection of the LGTBI collective against harassment and violence at work, with the intention of preventing and, where appropriate, establishing a mechanism that sets out how to act comprehensively and effectively in such situations.

To this end, this protocol brings together three types of measures that group together the minimum contents established in section 7 of the Annex to RD 901/2020, of October 13 and in Royal Decree 1026/2024, of October 8, which develops the planned set of measures for equality and non-discrimination of LGTBI people in companies:

1. Preventive measures, including a statement of principles, the definition and identification of conduct against sexual freedom at work, sexual harassment and harassment based on sex, as well as training and awareness-raising measures against such conduct.

2. Proactive or procedural measures to address conduct against sexual freedom, especially sexual harassment and harassment based on sex, in order to channel complaints or communications that may arise and precautionary measures.

3. Reactive measures against behaviors against sexual freedom, sexual harassment and harassment based on sex:

a. Corrective measures, including disciplinary measures.

b. Measures of redress or restitution of the victim's rights.

2. DECLARATION OF PRINCIPLES.

Conduct against sexual freedom at work, including sexual harassment and harassment based on sex, including harassment and violence against the LGTBI collective at work are totally prohibited in the company and are considered unacceptable. Therefore, the signatory parties undertake to guarantee the following principles:

1. Every person has the right to receive correct, respectful and dignified treatment, with respect for his or her privacy and physical and moral integrity, and may not be subjected under any circumstances, whether by birth, race, sex, sexual orientation, gender expression or identity, gender or family diversity, religion, opinion or any other personal or social condition or circumstance, including his or her employment status, to degrading, humiliating or offensive treatment.

2. All employees are entitled to effective occupational health and safety protection. Given the status of behaviors against sexual freedom at work, including sexual harassment and harassment based on sex, sexual orientation, gender expression or identity, gender or family diversity, as occupational risks of psychosocial origin, LALIGA is committed to allocate the necessary human and material resources to prevent and address, where appropriate, the consequences arising from this type of behavior.

3. LALIGA will ensure the maintenance of a risk-free work environment and adopt the necessary measures, both organizational and training and information, to prevent the occurrence of conduct against sexual freedom at work, including sexual harassment and harassment based on sex, sexual orientation; gender expression or gender identity; gender or family diversity as occupational hazards in relation to the staff and also with people who, not having an employment relationship, provide services or collaborate with the company, in application of the procedures for coordination of business activities in preventive matters.

4. LALIGA recognizes and guarantees the right of personnel who consider themselves the object of conduct against sexual freedom at work, including sexual harassment and harassment based on sex, harassment and/or violence based on sexual orientation; gender expression or identity; gender or family diversity, to request the opening of the procedure provided for this purpose in this protocol.

5. It recognizes the importance of developing training and informative actions to help prevent conduct against sexual freedom at work, including sexual harassment and harassment based on sex, harassment and violence based on sexual orientation; gender expression or identity; gender or family diversity, and the commitment to inform and train the entire workforce, ensuring their knowledge to new recruits, on the contents of this protocol and to sensitize them on the values of respect on which it is inspired.

3. OBJECTIVES.

The purpose of this protocol is to update the procedure for the prevention and resolution of conflicts regarding sexual harassment and/or harassment based on sex, sexual orientation, gender expression or identity, gender or family diversity and other conducts against sexual freedom, guaranteeing the right to invoke it and safeguarding the rights of the affected personnel within a context of prudence and confidentiality, processing the communications submitted with due consideration, seriousness and speed.

This protocol will take special care of:

1. Promote a culture of prevention of any type of conduct against sexual freedom, especially sexual and/or gender-based harassment.

2. Prevent, detect and solve possible situations that threaten sexual freedom, especially sexual harassment and/or harassment based on sex, sexual orientation, gender expression or identity, gender diversity or family.

3. To investigate internally, in an agile, rapid and confidential manner, the reports of conduct that violates sexual freedom, in order to determine whether such a situation has occurred in the company.

4. Determine, as the case may be, the need to adopt precautionary measures during the investigation process until the final resolution of the procedure.

5. Provide the assistance deemed necessary for the victim, avoiding secondary victimization or revictimization.

6. To protect persons who have submitted a communication against any type of actual conduct against sexual freedom at work, including persons who present themselves as witnesses, ensuring that those who intervene in a process will not be subject to intimidation, persecution or retaliation, with any action in this regard being considered subject to disciplinary sanctions as deemed appropriate. Likewise, the persons affected by the communication shall be protected until such time as the conduct reported is proven.

Those persons who submit a communication for conduct against sexual freedom at work shall be subject to sanction when it is proven that it is manifestly false or empty of content, having been sub-

mitted with the sole purpose of harming the person affected by the communication and calling into question his or her credibility.

7. Adopt disciplinary measures against the person affected by the communication when a situation of harassment is found.

4. SCOPE OF APPLICATION.

The protocol will be applicable to all persons providing services in LALIGA without exclusions or distinctions based on their nature or legal relationship, including temporary employment agency personnel.

It is also applicable to persons who, not having an employment relationship, provide services or collaborate with the company, such as trainees, those who carry out non-work internships, contract and subcontract personnel and self-employed persons who provide services for the company, in application of the procedures for the coordination of business activities in preventive matters.

The protocol shall apply to conduct and acts against sexual freedom at work, especially sexual and/or gender-based harassment, including those committed in the digital environment, which occur during work, in any area that has a direct relationship with the provision of services of workers for LALIGA.

5. PRINCIPLES.

This Protocol complies with the following Principles:

5.1. CONFIDENTIALITY AND CONFIDENTIALITY.

All persons involved in any of the phases of the procedure are obliged to maintain strict confidentiality and reserve. Therefore, they should not transmit or disclose information on the content of the communications submitted, resolved, or under investigation of which they are aware, with the sole exception of those required by the judges or the corresponding authorities. From the initial communication, numerical codes will be assigned to the parties concerned, so that no names will appear so as not to identify individuals until the report of conclusions.

5.2. DILIGENCE AND CELERITY.

The investigation and resolution of the reported conduct must be carried out without undue delay, so that the procedure can be completed in the shortest possible time, respecting due diligence.

5.3. RESPECT AND DIGNITY OF PERSONS.

LALIGA will take appropriate measures to ensure the right to protection of the dignity and privacy of the affected persons, including the person allegedly harassed and the alleged harasser, and respecting the principle of presumption of innocence of the latter.

5.4. CONTRADICTION AND ORALITY.

This protocol is based on the principles of contradiction and orality: it will be resolved after hearing the parties involved, although the statements will be recorded or transcribed by means of minutes, which will be kept by the person(s) in charge of the investigation. The procedure guarantees a fair hearing and fair treatment for all persons concerned. The truth and the clarification of the facts reported shall be pursued in good faith.

5.5. DATA PROTECTION.

Data protection regulations shall be duly respected and complied with.

5.6. INDEMNITY AGAINST RETALIATION.

Any adverse treatment or negative effect towards a person as a consequence of filing a complaint, claim, communication, recourse against his/her discrimination for sexual harassment and/or harassment on the basis of sex and other conduct against his/her sexual freedom or that of another person, as well as towards those who appear as witnesses or participate in the procedure, is prohibited.

However, the existence of a communication that turns out to be false and it can be proven that it has been presented with the intention of harming, discrediting and causing damage to the person affected by the communication is typified in the sanctioning regime of the collective bargaining agreement as a very serious infraction and may result in the imposition of the corresponding sanction, entailing dismissal.

5.7. SOCIAL PROTECTION OF THE VICTIM.

Precautionary measures that may protect the informant and/or the person affected by the communication shall be established, depending on the circumstances, always with the consent of the person affected, to protect his or her psychological and physical health in the preliminary stages, during the proceedings and after the proceedings, if necessary.

6. CONCEPTS AND DEFINITIONS.

6.1. SEXUAL HARASSMENT.

According to art. 7.1 of Organic Law 3/2007, of March 22, for the effective equality of women and men, sexual harassment is any verbal or physical behavior of a sexual nature that has the purpose or has the effect of violating the dignity of a person, in particular, when it creates an intimidating, degrading or offensive environment, being sufficient for such consideration that it is a single serious episode, although generally harassment is not conceived as something sporadic, but as something insistent, repeated and harassing.

Such harassment shall in any case be considered discriminatory, especially when a right or an expectation of a right is conditioned on the acceptance of a request of a sexual nature.

Sexual harassment includes all behaviors of a sexual nature, both those that are directed specifically at a specific person (bilateral) whether or not in exchange for a certain demand (sexual blackmail) and those of a sexual nature that may be directed in an indeterminate manner at a group of people through writings, gestures or words that may be considered offensive (environmental sexual harassment).

6.1.1. Conduct constituting sexual harassment

Conduct constituting sexual harassment is considered to be sexual harassment:

1. Verbal behaviors: **Unwelcome sexual advances, propositions or pressure for sexual activity; insistence on participating in social activities outside the workplace, after the target has made it clear that such insistence is annoying and unwelcome; offensive flirtations; suggestive remarks, innuendoes or obscene comments; unwelcome telephone calls; jokes or comments about sexual appearance.**

2. Non-verbal: **Display of sexually suggestive or pornographic pictures, objects or writings, lewd looks, whistling or making certain gestures; letters or e-mail messages, text messages or other digital media, of any other offensive sexual content.**

3. Physical: **Deliberate and unsolicited physical contact, unwanted hugs or kisses, excessive or unnecessary physical closeness.**

6.2. HARASSMENT BASED ON SEX.

Pursuant to the provisions of art. 7.2 of Organic Law 3/2007, it constitutes harassment based on

sex, and harassment based on sexual orientation, gender identity, gender expression, sexual characteristics and family diversity, during work, in connection with work or as a result thereof, in the context of their communications and also in those made through information and communication technologies (virtual harassment or cyberbullying). It shall also include any behavior carried out on the basis of a person's sex for reasons of sexual orientation, gender identity, gender expression, sexual characteristics and family diversity, with the purpose or effect of violating their dignity and creating an intimidating, degrading or offensive environment.

Discrimination on the basis of pregnancy or maternity, any unfavorable treatment accorded to her pregnancy or maternity, or to her own condition as a woman, shall constitute direct discrimination on the basis of sex.

As in the previous case, this harassment will also be considered, in any case, discriminatory, especially when it conditions a right or an expectation of a right to the acceptance of a situation constituting harassment.

6.2.1. CONDUCT CONSTITUTING HARASSMENT BASED ON SEX.

By way of example and without excluding or limiting, a series of conducts or behaviors that, carried out based on the sex or sexual orientation of a person and with the purpose of violating his or her dignity and creating an inappropriate environment, could constitute this type of harassment, are indicated:

1. Unfavorable treatment of women and men or the LGTBI collective for the mere fact of being so.

2. The exclusion for access to employment or to any work condition due to sex, sexual orientation, gender identity, gender expression, sexual characteristics when such requirement is not an essential professional characteristic or is not a positive discrimination measure legally established or agreed in the Equality Plan that seeks to eradicate an imbalance between men and women.

3. Evaluating a person's work in an inequitable or biased manner, on the basis of sex/gender, sexual orientation, gender identity, gender expression, sexual characteristics.

4. Assigning tasks or jobs below the professional capacity or competencies of the person, because of their sex/gender.

5. Making discriminatory or demeaning comments towards people based on their sex, sexual orientation, gender identity, gender expression, sexual characteristics.

6. Using sex or sexual orientation, gender identity, gender expression, sexual characteristics as a factor of insult or degradation.

7. PREVENTIVE MEASURES .

In order to prevent and avoid situations of sexual harassment and/or harassment based on sex at work, LALIGA will carry out the following measures:

1. Information and Awareness:

- An explanatory and awareness campaign on this protocol will be carried out, disseminating it to the entire workforce, including management.

- This protocol will be posted on the company's intranet and will be sent by e-mail to the entire workforce, taking into account new recruits on a regular basis.

- The protocol will be accessible to contracted/subcontracted companies and freelance personnel providing services for LALIGA.

- The work of the legal representation of the workforce will be facilitated in raising awareness of the workforce as established in the LO 10/2020, of September 9, guaranteeing sexual freedom, according to which the delegates "must contribute to preventing the commission of

crimes and other conduct against sexual freedom and moral integrity at work, with special attention to sexual harassment and harassment based on sex, sexual orientation, gender identity, gender expression, sexual characteristics, including those committed in the digital environment, by raising awareness of workers against it and informing the management of the company of the conduct or behavior of which they are aware and that could lead to it".

2. Training

- The necessary training in prevention and intervention against conducts against sexual freedom will be provided to all persons who are part of the Instructing Commission for the treatment of communications of sexual harassment and/or harassment based on sex and other conducts against sexual freedom.

- Training workshops will be organized for the staff on prevention and action against behaviors against sexual freedom, especially sexual harassment and/or harassment based on sex, sexual orientation, gender identity, gender expression, sexual characteristics and with an emphasis on the digital environment.

- LALIGA will disseminate and publicize this protocol for the prevention, detection and action against discriminatory harassment or violence based on sex, sexual orientation and identity, gender expression and sexual characteristics.

8. PROACTIVE AND PROCEDURAL MEASURES.

8.1. INVESTIGATING COMMITTEE FOR THE TREATMENT OF COMMUNICATIONS OF SEXUAL HARASSMENT AND/OR HARASSMENT BASED ON SEX, SEXUAL ORIENTATION, GENDER IDENTITY, GENDER EXPRESSION, SEXUAL CHARACTERISTICS AND OTHER CONDUCTS AGAINST SEXUAL FREEDOM.

An Instructing Committee shall be set up to deal with reports of sexual harassment and/or harassment based on sex and other conduct against sexual freedom, as the body in charge of processing all proceedings substantiated in accordance with the provisions of this protocol.

Said Instructing Committee shall be composed of three persons who shall be:

- The Regulatory Compliance Body (single-member body).

- The Director of the People Management Department.

- LALIGA's person with the specialty of psychosocial risk prevention.

If, for any reason, these two persons and/or the compliance body, individually or several of them, could be directly or indirectly affected by the case in question, jeopardizing their performance with the required independence and impartiality, by their own decision or at the request of any person related to the case, they may be replaced by another person from LALIGA with sufficient knowledge and experience in cases of sexual harassment or harassment based on sexual orientation, gender identity, gender expression or sexual characteristics. The substitution of all or any of these three persons may also be made in favor of one or more independent third parties with experience and knowledge on the subject.

The investigation of each case may be carried out by these two persons and/or the compliance body or by the person or persons designated by them (internal or external). The person or persons in charge of the investigation will be responsible for promoting and supervising all the actions to resolve the case and for drawing up the conclusions report. In addition, they will be responsible for the administrative processing of the informative file, for which purpose they will make the summons and take the appropriate minutes, recording the interviews when the interviewee consents, as well as attesting to the content or agreements and safeguarding the file with its documentation.

Additionally, an advisor may be appointed as a technical person in charge of advising the Instructing Committee. It will be necessary to have experience in issues of sexual harassment, harassment based on sex, sexual orientation, gender identity, gender expression, sexual characteristics and other conduct against sexual freedom.

8.2. PROCEDURE FOR ACTION.

8.2.1. Communication Channels

Reports of sexual or gender-based harassment or other conduct against sexual freedom shall be submitted through the channels of the Internal Information System, in accordance with the provisions of the INTERNAL INFORMATION SYSTEM OPERATING MANUAL, which are as follows:

a. Ethics Channel: Internal channel available to the Organization's professionals to report any irregular behavior within the Organization, including sexual harassment or gender-based harassment in the professional environment.

This tool is easy to access and is available 24 hours a day, 365 days a year through the corporate intranet.

b. Integrity Channel: Channel enabled in order to communicate irregular conduct or behavior of which they are aware, in relation to the integrity of their sports competitions, child protection on those minors who participate in activities organized by the LALIGA Organization or in which it collaborates, as well as any other irregular conduct. This channel is located on the corporate website of the LALIGA Organization, in a separate and easily identifiable section for any third party, following the following access route "LALIGA Institutional" "Guides, Manuals and Channels".

c. Verbal or other written communication: Notwithstanding the foregoing, in addition to the channels described above, persons included in the scope of the Operating Manual may also submit any communication of sexual or gender-based harassment, in writing or verbally (by means of a face-to-face or telematic meeting), anonymously or not, including but not limited to, to: (i) the LALIGA Compliance Body, (ii) the People Management Department, (iii) the Legal Department, (iv) to other bodies and persons of the Organization (for example: any of the members of the formally constituted workers' representation).

In the case of verbal communications, these shall be documented, subject to the informant's consent, either (i) by recording the conversation in a secure, durable and accessible format; or (ii) through a complete and accurate transcript of the conversation.

8.2.2. Communication requirements

The communication of a situation of sexual harassment and/or harassment based on sex or any conduct against sexual freedom at work may be made anonymously or through identification, and may be made by the affected person or by a third person, or by the legal representatives of the workers who have knowledge of the facts.

The communications must meet a series of minimum requirements in order to be considered for the purpose of initiating the file and the corresponding investigation, if necessary. The minimum requirements of the Communication are:

a. Identification of the affected persons, i.e., those who are involved in and/or may have knowledge of the possible situation of sexual harassment, harassment based on sex or sexual freedom. The above, without prejudice to preserving the anonymity of the informants.

b. Approximate dates on which the irregular behavior may have occurred.

c. How the possible irregular conduct became known.

d. Description of the irregular behavior as precisely or in as much detail as possible.

e. Where applicable, if possible, provide documents or evidence of the facts reported.

In order to obtain all the necessary data to be able to evaluate the communication and take the appropriate actions, it will be necessary to provide all the above data. In the event that the Communication has been sent through any of the aforementioned digital channels, such data will be requested in the entry form, being mandatory to fill in those fields marked with an asterisk "(*)".

If the platform is chosen, the referred form will indicate that there is the option to make the Communication anonymously or not:

- In the event of opting for non-anonymous communication, the e-mail address will be required so that the platform on which the digital information channels have been configured sends the informant a message confirming the communication sent together with the user name and password.

- In the event of opting for an anonymous communication, the platform will directly show the "user" and "password" to the informant, who must save the credentials in order to be able to access the aforementioned platform in the future and know the status of his/her communication, as well as provide additional information or documentation that may have been eventually required.

In any case, the informant, in his first access to the platform, must modify the password for security reasons. Likewise, if the informant does not access the platform for a period of more than ninety (90) days, he/she must change the password for the same reasons.

In the case of communications made verbally or by other written means, the option of anonymity has also been provided, complying with the same minimum requirements described above, and the informant must indicate how he/she wishes to be notified.

When the person making the communication is not the person directly affected or victim, the first action shall be to inform him/her in writing and request his/her ratification.

Both the victim of sexual harassment and/or harassment based on sex or conduct against sexual freedom, as well as the person affected by the communication shall have the right to be accompanied and/or represented at all times by legal/union representation or by the person they deem appropriate throughout the procedure.

8.2.3. Communication Management.

The management of the communication shall follow the procedures established in the MANUAL OF OPERATION OF THE INTERNAL INFORMATION SYSTEM, in specifically in its number 5 related to the MANAGEMENT OF RECEIVED COMMUNICATIONS, and specifically in the following points: Item 5.1. relating to RECEIPT OF COMMUNICATION. REGISTRATION AND CLASSIFICATION, specifically in its numbers 5.1.1. and 5.1.2.

8.2.4. Research

Once the communication is received by the manager of the corresponding system or by the persons previously identified, the analysis process may entail the exercise of additional investigative actions, in order to decide whether to initiate an investigation process or whether to file the information as totally unfounded or inappropriate.

If it is decided to continue with the investigation, the System manager will forward it to the Investigation Commission, initiating the investigation phase, notifying the informant. If, on the other hand, it is decided to reject the communication, the informant will be notified, stating the reasons for such rejection.

In the event that the System Manager agrees to initiate an investigation procedure, the Investigation Committee shall decide whether said process shall be assumed internally or whether it shall be entrusted to an external independent expert advisor, proceeding to the appointment of the persons in charge of the investigation.

Once the initiation of the investigation phase has been agreed upon, the Investigation Commission and, if applicable, the instructors, if different, shall ensure that all necessary measures are taken to investigate the reported facts, guaranteeing that:

a. The identity of the informant and of any third party mentioned in the communication is preserved.

b. The investigation procedure is managed with the objectivity, independence and guarantees necessary to avoid pressure or interference.

c. The harm resulting from the reported conduct or behavior does not persist.

d. The principle of hearing, presentation of evidence, defense and presumption of innocence of the affected persons is ensured.

e. The means of evidence collected are preserved, respecting the rights of the affected persons.

f. The convenience of informing the competent authorities is evaluated.

The investigation phase shall begin with a personal interview of the Investigating Committee with the informant, whose statement shall be duly noted. The informant will be summoned within a maximum of 3 working days of receipt of the communication. If the informant does not coincide with the alleged victim, after the informant's statement, the alleged victim will be summoned within a maximum period of 3 working days to also take a statement to hear his or her version of the facts first hand and, therefore, ratify the facts reported. After the interview/s with the informant and the victim, the person affected by the communication will be notified of the initiation of the investigation procedure within a maximum period of ten (10) working days from the opening of the procedure and will be summoned for a hearing.

In order to protect the alleged victim and to avoid contact with the alleged aggressor and interference during the investigation process, the Commission Instructing may propose precautionary measures for the duration of the investigation and until its resolution. These measures may in no case imply for the victim a prejudice or impairment in their working conditions, nor any substantial modification thereof.

In this phase, the main objective is to know the situation of the affected person and to investigate the reported facts. To this end, the Instructing Committee may conduct interviews or other investigative actions with any of the persons involved, witnesses, or third parties who are considered to be able to provide useful information, in order to conclude whether it is a case of conduct against sexual freedom, sexual harassment and/or harassment based on sex, sexual orientation, gender identity, gender expression or sexual characteristics at work.

The Investigating Committee shall record the proceedings carried out in the investigation file.

As a general criterion, the estimated duration of this investigation phase will be 15 working days from the presentation of the communication, as long as there are no circumstances that require the extension of said estimated duration for the practice of additional investigation diligences or because it is necessary to travel for its practice, as well as the late statement of the alleged victim by his own request or the coincidence with vacation period or situations of notified temporary disability.

The Instructing Committee will treat each case on an individual basis, and will ensure that the victim is heard and supported at all times.

A file shall be created with the documentation of all the proceedings carried out, which shall be kept by the person or committee in charge of the investigation.

Throughout the investigation process, the right to privacy of the persons involved will be respected, as well as the duty of confidentiality. For this reason, the identity of the persons interviewed will be preserved.

At any time during the investigation process, the Commission or the person in charge of the investigation may, ex officio, request the advice or collaboration of any Management or persons of the Organization or third parties necessary for the clarification of the facts, the determination of the consequences that may arise and the form of action to be taken.

8.2.5. Resolution

The Commission or the person in charge of the investigation shall issue a report. In the case of different persons, the person in charge of the investigation shall submit the report to the Instructing Committee for its evaluation. The indicative term for the issuance of said report shall be 10 working days, which may be extended by 5 more days, if necessary, computed from the end of the investigation.

The report shall include the following information:

- Case background.
- Precautionary or preventive measures, if any, adopted on a temporary basis and during the course of the investigation.
- Investigation procedures carried out.
- Conclusions and proposed actions.

The Investigation Committee shall submit the report of conclusions together with its recommendations, in a reasoned manner, for the adoption of preventive, corrective and disciplinary measures to the Management. Within the Instructing Committee, decisions shall be taken by consensus, whenever possible, and failing that, by majority vote.

9. MANAGEMENT DECISION.

The Corporate General Management and/or the Presidency, once the conclusions of the Investigation Committee have been received, shall adopt the decisions it deems appropriate within 10 working days, and shall be the only body empowered to decide on the matter. The decision adopted shall be communicated in writing to the Instructing Committee, the victim and the person affected by the communication, who shall maintain confidentiality regarding the information to which they have access.

In the case of the harassing person or, if as a result of the outcome of the investigation it is decided to adopt disciplinary measures, these will be duly notified by the Management, in accordance with the Collective Bargaining Agreement and applicable regulations.

If a situation of harassment has been declared, the necessary preventive measures will be reinforced to avoid a recurrence of the situation, including, but not limited to, the following:

- Update on the evaluation of psychosocial risks in the company.
- Adoption of health surveillance measures to protect the victim.
- Adoption of measures to avoid recidivism of the sanctioned persons.

- Psychological and social support to the person being harassed.

- Modification of working conditions that, with the prior consent of the victim of sexual harassment and/or harassment based on sex, sexual orientation, gender identity, gender expression, sexual characteristics or any other conduct against sexual freedom, are deemed beneficial to their recovery.

- Carrying out new training and awareness actions for the prevention, detection and intervention against sexual harassment and/or harassment based on sex, sexual orientation, gender identity, gender expression, sexual characteristics and other behaviors against sexual freedom, aimed at all the people who provide their services in the company.

10. VALIDITY AND REVIEW.

This Protocol shall enter into force on the day following its approval by the Corporate General Management, subject to ratification by the LALIGA Delegate Commission.

This protocol will remain in force for a period of 4 years. The Monitoring Committee of the Company's Equality Plan will carry out an intermediate evaluation of its effectiveness and a final evaluation, in order to assess whether it meets the objectives for which it has been established or whether it is necessary to modify it. In any case, the review of this protocol will be carried out in the following cases:

1. At any time during its validity when it is considered necessary to reorientate the fulfilment of its objectives, including in the event that a new Plan for Equality between men and women so requires.

2. When their lack of compliance with the regulatory requirements or their inadequacy is revealed as a result of legal proceedings or proceedings by the Labour and Social Security Inspectorate.

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