



WORKPLACE BULLYING AND HARASSMENT POLICY

DOC N. °: GGR-HR-POL-0004

REVISION: A2

DATE: 17/12/2024

INTERN

Title	Workplace Bullying and Harassment Policy
Scope of application	Australia
Category	Policy
Elaborated by	HR responsible
Date of approval	17/12/2024
Approved by	Board of Directors of Gransolar Group, S.L.
Version substituted	V1
New version	A2
Use	INTERN

Revision record

Revision	Date (dd-mm-yy)	Elaborated by	Changes made	Revised by
V1	29/05/2024	HR responsible	Policy creation	Board of Directors of Gransolar Group, S.L.
A2	17/12/2024	HR responsible	Formats adapt for Director Plan	Governance Department

Approvals

Name	Version
BoD (29/05/2024)	V1
BoD (17/12/2024)	A2

Index

- 1. Introduction.....3
- 2. Scope of application.....3
- 3. Purpose4
- 4. Mission, vision, and values4
- 5. General Principles.....4
- 6. Unacceptable Workplace Behaviours.....5
 - 6.1 *Workplace Bullying*.....6
 - 6.2 *Harassment*7
 - 6.3 *Sexual Harassment*.....7
 - 6.4 *Hostile workplace environment*.....8
 - 6.5 *Discrimination*.....9
 - 6.6 *Victimisation*10
 - 6.7 *Vilification*.....10
- 7. Obligations and responsibilities.....10
 - 7.1 *Everyone*.....10
 - 7.2 *Managers/Supervisors*11
- 8. Training Requirements12
 - 8.1 *Access to copies of the Group policies and procedures*.....12
 - 8.2 *Training*.....12
 - 8.3 *Training records*.....12
 - 8.4 *Support*13

The Board of Directors of Grupo Gransolar, S.L. (hereinafter, 'Gransolar'), as part of its general and non-delegable power to develop and approve the general policies, procedures, and strategies of the company, has approved this Policy (hereinafter, the 'Policy').

The purpose of this Policy, which is addressed to all stakeholders, is to define and establish the principles and criteria governing actions for the prevention of workplace bullying and harassment.

1. Introduction

At Gransolar we base our management on excellence, responding to the needs of our stakeholders, contributing value to society, and seeking social, economic, and environmental sustainability. As Participating Members of the United Nations Global Compact, we promote the Sustainable Development Goals, assuming our role as an agent of change in terms of sustainability. Furthermore, Gransolar defends the recognition of Human Rights, adopting a position of defence against possible violations in the territories where we operate, extending to all our Stakeholders our Whistleblowing Channel, recently updated in accordance with Directive EU 2019/1937 and Law 02/2023, in order to adopt standards of anonymity and confidentiality.

Furthermore, Gransolar is committed to the highest standards of transparency and accountability, following a zero-tolerance policy towards any conduct contrary to our Corporate Policies and extending these commitments to all our stakeholders. This commitment, integrated in all its internal rules, is based on a corporate culture firmly rooted in the sustainability of the business model and extends to all the Group's operations and value chain.

Gransolar is convinced of its role as a leading agent of change. This is why we have adopted an "early-adopter" culture in relation to the new regulations that have recently been approved in the field of sustainability, as well as the indications, guidelines, and recommendations of recognised international bodies.

2. Scope of application

This policy applies to all Gransolar Group companies located in Australia, as well as to its employees. By accepting employment with our company, employees must be aware of, and comply with, this policy at all times.

Contractors, consultants, suppliers, volunteers, students, apprentices/trainees, and those on work experience must also be made aware of this policy, and the requirement for them to act in accordance

with it, for the period of their engagement. Employees who engage or manage external consultants, contractors, suppliers, volunteers, or students are responsible for referring this document to the appropriate employer and/or respective organisation to address concerns regarding inappropriate behaviour, which may be considered contrary to this policy, the Code of Conduct, and/or other corporate policies.

This policy is applicable to any interaction employees have with other people in the workplace or through association with the workplace. This may include interactions outside of the workplace including social events, sporting groups and electronic interactions such as social media, email, and text.

3. Purpose

Gransolar is committed to creating a workplace culture where all employees are treated with dignity and respect. All employees have a shared obligation to create and maintain a positive, productive, and respectful work environment. And ensure that all employees are aware that harassment situations should not be allowed, and any witness must report it through the channels that Gransolar Group has made available to all Group employees.

4. Mission, vision, and values

The objectives of this Policy are to:

- outline expected standards of workplace behaviour;
- mitigate against the risk of bullying and discriminatory behaviour, harassment, sexual harassment, victimisation, vilification, and hostile work environments in the workplaces of the Group by:
- describing unacceptable workplace behaviour that is not tolerated by the Group; communicating the rights and obligations of individuals; and
- directing individuals to the Group reporting and grievance processes should they wish to raise a complaint relating to inappropriate workplace behaviour.

5. General Principles

All individuals covered by this Policy are required to:

- a. comply with all laws, contracts, Group policies, procedures, and the Code of Conduct;
- b. comply with all lawful and reasonable directions from managers;
- c. promptly raise all suspected breaches with their manager, or report suspected breaches in accordance with Whistleblower Policy;
- d. adhere to safety rules and co-operate with the Group in the interests of workplace health and safety.

Furthermore, Gransolar strives to be an equal opportunity employer and actively seeks to create a safe and respectful workplace that is free from unacceptable behaviours. Gransolar does not tolerate the following behaviours in Group workplaces or any other conduct that is prohibited by this Policy or is otherwise unlawful:

- I. bullying;
- II. harassment;
- III. sexual harassment;
- IV. hostile workplace environments;
- V. unlawful discrimination (which may include sex discrimination, sex-based harassment, or other types of harassment);
- VI. victimisation; or
- VII. vilification.

6. Unacceptable Workplace Behaviours

The behaviours listed above are unacceptable and unlawful and the Group has a legal obligation to eliminate this conduct as far as possible. All persons covered by this Policy are expected to adhere to obligations under all applicable laws in the relevant jurisdiction at all relevant times.

We wish to make clear that we take very seriously the positive duty to take reasonable and proportionate measures to eliminate, as far as possible, sex discrimination, sexual and sex-based harassment, hostile work environments and victimisation.

Any person found to have breached this Policy by displaying any of these behaviours may be subject to disciplinary action.

6.1 Workplace Bullying

Workplace bullying occurs when:

1. An individual or group repeatedly behaves unreasonably towards another individual or group of people at work; and
2. the behaviour creates a risk to health and/or safety (including psychological safety).

A single incident of unreasonable behaviour is not bullying. However, it may constitute another type of unreasonable or inappropriate behaviour under this Policy. A persistent range of different unreasonable behaviours over time can still amount to bullying.

Workplace bullying may involve any of the following repeated behaviours:

- aggressive or intimidating conduct;
- belittling or humiliating comments;
- spreading malicious rumours;
- teasing, practical jokes or initiation ceremonies;
- exclusion from work-related events;
- intentionally setting tasks that are unreasonably below or beyond a person's skill level;
- displaying offensive material in the workplace; and
- pressure to behave in an inappropriate manner.

Bullying does not include legitimate and reasonable management action carried out in a reasonable manner such as:

- performance and underperformance management;
- disciplinary action for misconduct or disciplinary measures in accordance with other Group policies and procedures;
- implementing workplace policies and procedures;
- reasonable directions about work allocation, duties, and work attendance;
- maintaining reasonable goals and standards at work
- making justifiable decisions related to recruitment, selection, and other development; and
- overseeing injury and illness in accordance with Work Health and Safety, injury management and workers compensation legislation and policies.

6.2 Harassment

Harassment in the workplace that is unlawful is any type of behaviour that generally:

- is unwelcome or unwanted by the recipient and which offends, insults, humiliates or intimidates them; and
- where a reasonable person, having regard to the circumstances, would anticipate the possibility that the behaviour might offend, insult, humiliate or intimidate the person being harassed.

This may be a one-off incident or repeated and continuous occurrences. Harassment can involve physical, verbal, and visual conduct which can be written or drawn in the form of posters, email, text messages or social media.

Harassment can include behaviour such as:

- telling insulting jokes about particular groups;
- displaying racially offensive or sexually explicit posters or screen savers;
- making derogatory comments or taunts about a person's
- physical characteristics; or
- asking intrusive questions about someone's personal life.

6.3 Sexual Harassment

A person sexually harasses another person if:

- they make an unwelcome sexual advance, or an unwelcome request for sexual favours, to the person harassed; or
- they engage in other unwelcome conduct of a sexual nature in relation to the person harassed, in circumstances in which a reasonable person, having regard to all the circumstances, would have anticipated the possibility that the person harassed would be offended, humiliated, or intimidated.

This behaviour does not need to be repeated or continuous.

Sexual harassment can take many forms, including physical, verbal or written. It is not just obvious unwelcome physical behaviour such as inappropriate touching, patting or offensive gesturing.

Sexual harassment also includes:

- staring or leering;
- suggestive comments or jokes;
- unwanted invitations to go out on dates or requests for sex;
- intrusive questions about a person's private life or body;
- inappropriate physical contact or unnecessary familiarity, such as brushing up against a person;
- emailing pornography or rude jokes;
- displaying images of a sexual nature around the workplace; or
- communicating content of a sexual nature through email, social media, or text messages.

6.4 Hostile workplace environment

It is unlawful for a person to subject another person to a workplace environment that is hostile on the ground of sex.

A person subjects another person to a hostile workplace environment if the first person engages in conduct that a reasonable person, having regard to all the circumstances, would have anticipated the possibility of that conduct resulting in the workplace environment that is offensive, intimidating or humiliating to a person based on that person's sex.

6.5 *Discrimination*

Discrimination is any practice or behaviour that makes an unlawful distinction between individuals or groups to disadvantage some people and advantage other people. This may be:

- I. Direct; or
- II. Indirect.

Direct discrimination is where a person is treated less favourably because of their individual characteristics or status (example: race, sex, sexual orientation, marital status, age, religion, colour, national extraction, social origin, political opinion, physical or mental disability, family or carer's responsibilities, pregnancy, breastfeeding, gender identity or intersex status) compared with others without that characteristic or status in the same or similar circumstances. This includes actual, potential, and perceived characteristics and status.

Indirect discrimination occurs where a generally applied work requirement or condition:

- is unable to be met by a person or group of people, due to their individual characteristics or status, but people without that characteristic or status would be able to comply, and
- the requirement or condition is not reasonable in all the circumstances.

Treating a person less favourably can include harassing or bullying a person. In addition to sexual harassment, the law has specific provisions relating to racial hatred (for example, insulting another person or group in public on the basis of their race) and disability harassment (for example, making humiliating comments or actions about a person's disability).

You are expected to adhere to your lawful obligations under all applicable laws in the relevant jurisdiction at all relevant times.

There are some exemptions from the anti-discrimination laws which may apply in some situations. The exemptions may include:

- compliance with genuine occupational requirements;
- the ability of a person to perform the inherent requirements of the position;
- necessity to protect public health;
- special measures intended to achieve equality (e.g. offering an apprenticeship to only female applicants);
- acts performed in compliance with legislation or a court order; and
- acts done in direct compliance with an award or enterprise agreement.

The above types of direct and indirect discrimination, and the exemptions that may apply, are covered in various laws in the relevant jurisdiction.

Employees may be personally liable if they engage in unlawful discrimination and a legal claim is made. The Group may also be liable for employees conduct (this is known as vicarious liability).

6.6 Victimisation

Victimisation or reprisal occurs when an individual is treated unfairly or threatened with or subjected to any detrimental treatment because that person, or someone they associate with, has made, or intends to make a complaint under a discrimination law or policy in good faith.

Reprisal is also prohibited under law and in accordance with the Gransolar Group Whistleblower Policy.

6.7 Vilification

Vilification is any act that occurs publicly which could incite, encourage, or urge others to physically harm, hate, have serious contempt for, or severely ridicule, a person, or a group of people because they are or are thought to be members of a particular group.

7. Obligations and responsibilities

All employees must comply with this Policy and not engage in Unacceptable Workplace Behaviour towards any colleagues, clients, suppliers, subcontractors, or other individuals whilst at a Group workplace or in the course of performing their duties.

Preventing Unacceptable Workplace Behaviour is a collective responsibility. Everyone has a role to play in preventing and reporting all behaviour that may be in breach of this Policy. This is consistent with the workplace health and safety obligations of each employee to protect each other from harm, including psychological harm.

7.1 Everyone

All individuals are expected to:

- a. Conduct themselves in a manner consistent with the Group's Values, the code of conduct and the behaviours applicable to those.
- b. Comply with all applicable laws, contracts and Group policies and procedures;

- c. Comply with all lawful and reasonable directions from their manager, supervisor, and other authorised officers of the Group;
- d. Keep up to date with all mandatory annual Group compliance training;
- e. Behave in a way that creates a safe, respectful, and inclusive environment and prioritises looking after the safety of others;
- f. Where possible, intervene in a way that is safe to do so, to, for example, redirect the conversation or stop the behaviour;
- g. Immediately report any alleged or suspected breach of the Code of conduct or this Policy in accordance with the Complaints and Investigation Procedure;
- h. Only raise complaints in good faith and not make false allegations;
- i. Keep details of any incident or investigation confidential;
- j. Co-operate in any investigations and not provide false or misleading information in the course of an investigation, or otherwise act in bad faith;
- k. Ensure any person impacted is safe and check in on them if appropriate;
- l. Report any Whistleblower complaints in accordance with the Gransolar Group Whistleblower Policy;
- m. Be aware of and respect cultural differences;
- n. Take all reasonable steps to respect the Group's ownership of all of its property, including funds, facilities, equipment, supplies, records, and information;
- o. Maintain the confidentiality of information, records or other materials acquired during employment, both during and after employment or engagement with the Group; and
- p. Do not abuse the advantages of employment or engagement for personal purposes.

7.2 Managers/Supervisors

Managers/Supervisors to whom any other Group employee reports are expected to:

- a. Model exemplary respectful workplace behaviours and conduct and acting as a positive example of acceptable conduct and standards for the team, function, and company;
- b. Comply with all applicable laws, contracts and Group policies and procedures;
- c. Promote positive and appropriate attitudes towards company policies;
- d. Create an environment that encourages teams to feel safe speaking up about or reporting Unacceptable Workplace Behaviour they experience or know of;

- e. Encourage a work environment that fosters inclusion and respect, including by using respectful and inclusive language;
- f. Identify and implement mitigation strategies to prevent breaches of our corporate policies;
- g. Support an individual impacted by Unacceptable Workplace Behaviour and understanding how they would like the issue managed;
- h. Prioritise the care and support of those impacted when responding to issues raised with you or observed;
- i. Treat complaints seriously, confidentially and take appropriate action in response to complaints;
- j. Call out Unacceptable Workplace Behaviour when observed or intervene appropriately to prevent or address Unacceptable Workplace Behaviour as described by this Policy, including appropriately reporting incidents to the Head of Human Resources or Managing Director
- k. Deal with any Whistleblower complaints in accordance with the Gransolar Group's Whistleblower Policy.

8. Training Requirements

8.1 Access to copies of the Group policies and procedures

All employees are to be provided with access to a copy of the Code of conduct and supporting documents upon induction to the Group.

The Policy is available to all employees through:

- I. the Gransolar Group intranet website; and
- II. the Human Resources Department.

The Code is to be accessible in each office and project site, and available on the Gransolar Group intranet.

8.2 Training

All employees are to complete induction within the first 5 days of their employment.

Employees must then complete refresher training every twelve (12) months.

8.3 Training records

Training records must be kept. These are to be stored for audit access at any point in time.

8.4 Support

The Group offers access to the Employee Assistance Provider (EAP) to all employees and their immediate family members. The EAP offers free and confidential support services through face-to-face, telephone and online counselling.

Examples of external resources in Australia which employees can access are below (for other jurisdictions, feel free to contact your HR department for details of support services that may be of assistance):

- SuicideLine
- Lifeline
- Women's Domestic Violence Crisis Service
- BeyondBlue Helpline



Avda. de la Transición Española 32
Parque Empresarial Omega, Edificio A
28108 Alcobendas (Madrid)

(+34) 917 364 248 | group@gransolar.com