



DIVERSITY AND NON-DISCRIMINATION POLICY

Prepared by	Reviewed by	Approved by
Head of GRC, Internal audit and ESG	Head of Legal, Head of Human Resources and CEO	Board of Directors



Neinor
HOMES

Control of reviews		
Review	Date*	Description of changes
1.00	24/05/2018	First version of the policy
2.00	27/01/2021	New principles
3.00	21/06/2022	Ethical channel data update and minor changes
4.00	24/05/2023	Integration of the Anti-Harassment Protocol

* Date of the Committee when the procedure was presented for approval (except in the case of immaterial changes that do not modify the established operations and protocols and that, in turn, are always made to increase the company's level of assurance, in which case they will be approved by the Head of Governance, Risk and Compliance, Internal Audit and ESG).

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“Hard copies may not be the latest version; consult the documentation on line”

1. Introduction

Through this policy, NEINOR HOMES, S.A. (hereinafter, “NEINOR HOMES”, the “Company”, or the “Group”), undertakes to promote an environment that fosters diversity and the inclusion of everyone and to voice its firm rejection of any type of discrimination. The Company’s commitments go beyond the applicable regulatory requirements. They are aligned with the highest ethical standards and the conventions of the International Labour Organisation (ILO) and, in particular, with Directive 2000/78/EC on establishing a general framework for equal treatment in employment and occupation and Directive 2000/43/EC on racial equality.

2. Objective

The objective of Neinor Homes’ Diversity and Non-discrimination Policy (hereinafter “the policy”) is to establish the criteria and guidelines to create a climate that promotes and ensures equal treatment and opportunities while eliminating any form of discrimination due to gender, nationality, race, culture, disability, sexual orientation, age, religious beliefs, political opinions or any personal, family, economic or social circumstances that might lead to discrimination.

This policy is in line with NEINOR HOMES’ Code of Ethics and Code of Conduct for Third Parties. The Code of Ethics and the Code of Conduct for Third Parties can be accessed via the following link to the corporate website: <https://www.neinorhomes.com/en/responsible-business-and-innovation/ethics/>.

3. Scope of application

The Diversity and Non-discrimination Policy applies to all the companies forming part of NEINOR HOMES. All personnel of these companies (directors, representatives, senior management, employees, etc.) have a duty to comply with this policy.

4. Principles of action

NEINOR HOMES considers diversity to be one of the main values of its human capital and has a firm commitment to equal opportunities, inclusion and non-discrimination, which is expressed through the following principles of action:

- Ensure equal treatment and opportunities for everyone and avoid discriminatory bias in the decisions and processes of selection, contracting, development, professional promotion and remuneration, among others.
- Firmly reject any form of discriminatory conduct or intolerance at all levels of the Company, whether for reasons of gender, nationality, race, culture, disability, sexual orientation, age, religious beliefs, political opinions or any personal, family, economic or social circumstances that could lead to discrimination.
- Promote measures that favour work-life balance and respect for the personal and family life of the Company’s professionals and that facilitate a better equilibrium between these and their work responsibilities, regardless of gender.

- Encourage collaboration and team work so that all the Company's professionals, regardless of their length of service, prior experience or any other personal or professional condition, feel part of NEINOR HOMES.
- Maintain an atmosphere that is free of workplace harassment, especially that intended to cause or that is based on direct or indirect discrimination.
- Recognize and respect the right to freedom of association, in line with the Company's Ethics Code, in order to preserve the choice of each worker in their relationship with trade union associations and their actions in the defense of their legitimate interests.
- Promote an atmosphere of respect and acceptance and strengthen the Company's culture and awareness of diversity, inclusion and non-discrimination through training and awareness initiatives and the creation of groups and networking in the areas of diversity and non-discrimination.
- Extend the commitments of respect for diversity and non-discrimination to all stakeholders and in particular with regard to raising awareness among suppliers and contractors.

The Diversity and Non-discrimination Policy is complemented by the Equality Plan of NEINOR HOMES, in which the Company sets out measures to achieve the principles established in this policy, such as mentoring programmes or representation targets, *inter alia*.

5. Responsibilities

Details are provided below of the different responsibilities to ensure compliance with the Diversity and Non-discrimination Policy.

The Board of Directors is the main driver of the implementation of a culture of equality, diversity and non-discrimination throughout the Company. This policy has the express commitment of senior management, including the Steering Committee and the Chairman of NEINOR HOMES.

Human Resources is responsible for ensuring compliance with the policy and its application, as well as a periodical review of the policy, in collaboration with the other departments of NEINOR HOMES. The Governance, Risk and Compliance, Internal Audit & ESG department will review and periodically report on compliance with the guidelines of the Diversity and Non-discrimination policy.

6. Monitoring and control

Group companies will ensure the necessary instruments and resources are made available for the correct implementation, monitoring and assessment of the Diversity and Non-discrimination Policy.

The Governance, Risk and Compliance, Internal Audit & ESG department will periodically review compliance with the guidelines set out in this policy.

NEINOR HOMES has an ethical channel, available to all stakeholders, including employees, suppliers, clients and other third parties, which can be used to communicate any doubts or suggestions and also report any conduct contrary to this policy.

In the event of non-compliance with any of the commitments or principles outlined in this policy, NEINOR HOMES will take the corresponding measures pursuant to labour law and the applicable collective bargaining agreement.

Any report may be sent by letter or via the corporate website at any time, as the channel is available 24 hours a day, 7 days of the week.

If ordinary mail is used, the address is:

NEINOR HOMES
Governance, Risk and Compliance, Internal Audit & ESG department
Paseo de la Castellana 20, planta 5ª.
28046 - Madrid.

If the corporate website is used, the link is <https://www.neinorhomes.com/en/responsible-business-and-innovation/ethics/ethics-line/> where the address of the channel enabled to deal with complaints in accordance with Directive (EU) 2019/1937 is indicated, guaranteeing the confidentiality of the parties and allowing the sending of anonymous communications when the informant so wishes: <https://neinorhomes.integrityline.com/frontpage>.

7. Training and dissemination

This policy will be included in the mandatory annual training subjects for all members of NEINOR HOMES, in both Spanish (the local language) and English. It will also be included in the welcome pack for new employees of the Company.

The policy will likewise be available on the intranet, common directories of NEINOR HOMES and will be available to the public on the Company's corporate website, in both Spanish and English.

8. Approval and entry into force

This policy has been approved by the Board of Directors of NEINOR HOMES in its meeting held on May 24, 2018, and will come into force on the same date.

Appendix: ANTI-HARASSMENT PROTOCOL

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1. Neinor Homes' commitment and scope of this protocol

NEINOR HOMES is committed to preventing and acting against harassment that its workers may suffer in all its forms, especially sexual harassment and gender-based harassment, in line with its Diversity and Non- Discrimination Policy, whose principles include rejecting any type of discriminatory conduct or intolerant behaviour, preserving an environment free of harassment at work, promoting an atmosphere of respect and acceptance, and extending all the commitments of this policy to all its stakeholders.

With the development and publication of this protocol, we reiterate this commitment, and assume the obligation to make its existence known to all our employees, indicating the need for its strict compliance.

This protocol shall apply to any situation arising at work, in connection with or because of work:

- In workplaces and work centres,
- During workers' rests, meal, or toilet breaks,
- In work-related communications, including those made by means of or involving information technologies, or through social networks,
- During travel, trips, events or social or training activities related to work, as well as in the accommodation provided to the worker, where applicable,
- On commutes between the home and the workplace;

With the application and communication of this protocol, Neinor complies with the requirements of Articles. 46.2 and 48 of Organic Law 3/2007, of March 22, for the effective equality of women and men, RD 901/2020 of October 13, which regulates equality plans and their registration and amends Royal Decree 713/2010, of May 28, and Article 14 of Law 31/1995, of November 8, on the prevention of occupational hazards.

The existence of this document does not preclude the right of the alleged victim to report, at any time, to the Labour and Social Security Inspection, as well as to the civil, labour, or criminal jurisdiction. In addition, regardless of the internal procedures detailed throughout this protocol, Neinor has the right to report to the corresponding authorities immediately upon becoming aware of any behaviour that could constitute a crime or criminal offense and shall be entitled to take the legal action it deems appropriate against the harassing person, depending on the seriousness of the incident.

This protocol will come into force from the moment of its publication and communication to Neinor Homes employees and will be reviewed and updated in the terms and manner provided for in the Equality Plan.

2. Zero tolerance for harassment

This anti-harassment protocol is applicable to any behaviour that may constitute harassment within the company. Harassment is, by definition, a multi-offensive act that affects several legal interests, among which the dignity of the worker and the rights to life and to physical, psychological, and moral integrity stand out. The affectation of dignity, however, does not prevent such an act from also causing damage to other legal interests such as equality and the

prohibition of discrimination, honour, self-image, privacy, or health. Nevertheless, harassment will always be contrary to dignity. Sexual harassment and gender-based harassment always generate an affectation to the dignity of the person who suffers it and are constitutive of discrimination based on sex.

Conduct that may constitute sexual harassment, discriminatory harassment, moral harassment or gender-based harassment based on sex in any of its manifestations will not be permitted or tolerated. The company may sanction anyone who engages in offensive conduct as well as anyone who promotes, encourages and/or tolerates it. All company employees, as well as people who provide services to the company and third-party collaborators have the obligation to respect the fundamental rights of all those who are part of Neinor, as well as those of our stakeholders, such as customers, third party collaborators, or public administration workers.

Any employee who believes that he or she is being harassed or is aware of a situation of sexual, moral, discriminatory or gender-based harassment towards another person in the company, will have the possibility, through communication or complaint, of activating this protocol as an internal procedure.

Once the corresponding report has been processed and if the occurrence of harassment in any of the forms detailed in this protocol is confirmed, Neinor will have the power to apply its disciplinary regime in order to guarantee a work environment free of violence and discriminatory or harassing conduct, especially sexual harassment or gender-based harassment.

2.1 Definiciones previas

The following are definitions for all types of harassment covered by this protocol. All forms of harassment described herein may occur from a superior to a subordinate, from a subordinate to a superior, or between co-workers at the same hierarchical level, as well as from and towards third party personnel external to Neinor. Likewise, these behaviours can occur at both the individual and group level.

Sexual Harassment

For the effects of this protocol, sexual harassment is any behaviour, verbal or physical, 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. Any act constituting sexual harassment shall be considered discriminatory.

By way of example and without excluding or limiting, the conduct described below could constitute sexual harassment:

- Verbal behaviours, such as offensive flirtations, obscene comments, verbal pressure for sexual activity, comments about physical appearance with sexual connotations or unwanted contact through social networks.
- Non-verbal behaviours such as displaying pornographic photos, objects or writings, gestures with sexual intent or messages through electronic media such as e-mail or social networks with offensive and/or sexual content.
- Physical behaviours, such as deliberate and unsolicited physical contact or excessive and unnecessary physical approach.

- “Quid pro quo” sexual harassment or sexual blackmail, such as forcing the victim to choose between submitting to sexual demands or losing or being disadvantaged in terms of benefits or working conditions affecting access to vocational training, continued employment, promotion, pay or any other related decisions.
- Environmental sexual harassment, i.e., based on situations in which the harasser creates an intimidating, hostile, degrading, humiliating or offensive environment for the victim, as a consequence of unwanted attitudes and behaviours of a sexual nature.

Harassment in the workplace

This protocol has defined three forms of harassment in the workplace other than sexual harassment, such as moral harassment or mobbing, discriminatory harassment, and gender-based harassment. For a given situation or behaviour to be considered one of these forms of harassment, a series of elements must be present, among which the following stand out:

- Harassment, understood as any intimidating, degrading, humiliating and offensive conduct that originates externally and is perceived as such by the person who suffers it. In this sense, possible job disagreements and differences of opinion arising as a result of the working relationship between employees, natural in personal and professional relationships, shall not be considered harassment.
- Objective attack on the victim's dignity and subjectively perceived by the victim as such, which may concur with damage to other fundamental rights, such as the right not to suffer discrimination, to psychological and physical health, etc.
- That it is not an isolated or occasional event, but rather repeated and prolonged behaviour over time.

Moral Harassment or mobbing

Moral harassment can be defined as the repeated practice or behaviour of one or more persons, whose objective or consequence is the personal, psychological, or physical degradation of another person, by means of words, gestures, attitudes, or other means that violate the dignity of said person. These behaviours can be manifested in the form of mockery, degrading gestures, isolation at work or in person, or verbal violence, among others.

This harassment can also occur with the objective of making the victim leave his or her job, when it manifests itself at a descending level (from a hierarchical superior to his or her subordinate), and through behaviours such as the malicious assignment of tasks, isolation from other employees or the unjustified denial of fair and equitable working conditions, in addition to those mentioned in the previous paragraph.

Discriminatory Harassment

Discriminatory harassment is defined as harassment which has the same characteristics as moral harassment and which originates from, or is linked to, any personal circumstance of the victim, such as ethnic or racial origin, religious beliefs or sexual orientation, and which seeks or succeeds in violating the dignity of the person or in creating a hostile, degrading or humiliating environment for him or her.

Gender-based Harassment

Gender-based harassment is any behaviour carried out based on a person's sex with the purpose or effect of violating his or her dignity and creating an intimidating, degrading or offensive environment. Any harassment based on sex shall be considered discriminatory.

In addition to the elements described above, which are common to all types of harassment in the workplace, the condition that the motive for these behaviours must be related to the fact of being a woman or to circumstances that biologically can only affect women (pregnancy, maternity, breastfeeding); or that have to do with the reproductive and care functions that have traditionally been presumed to be inherent to women is required in order to appreciate that a situation of harassment on the basis of sex is actually present. In this sense, harassment based on sex can also be suffered by men when they perform functions, tasks or activities related to the role that has historically been attributed to women, for example, a male worker who is harassed for taking care of minors or dependents.

2.2 Investigating commission for harassment cases.

An investigating committee (the "Committee") is formed for harassment cases, consisting of three persons:

- The Head of the GRC (Governance, Risk and Compliance) department.
- The responsible of the Human Resources department.
- The lawyer from the Legal department.

In the event of the absence of one of the members and the impossibility of extending the meetings to be held without failing to comply with the deadlines established in this protocol, another member of the GRC department may act as an alternate, to be designated for this purpose by the committee itself.

The members of the Committee shall be permanent, in order to guarantee the maximum confidentiality of possible cases of harassment received and dealt with by the Committee.

The Committee will have the task of processing and managing any communication or complaint for any behaviour that could be considered harassment in a diligent manner, carrying out the appropriate investigations and proposing, if necessary, corrective or disciplinary measures, with the greatest possible confidentiality, taking into account the risks to privacy and the right to honour of individuals.

In order to guarantee impartiality in the processing of harassment complaints handled by the Committee, provisions are made for cases in which the complaint received relates to a member of senior management, to one of the members of the Committee itself, or in the event of the existence or suspected existence of conflicts of interest, i.e., in the case of friendship or manifest enmity, kinship or hierarchical dependence between the person reported and one of the members of the Committee, etc. In such cases, the Commission may:

- Remove from the investigation of the case the member of the Commission who is necessary to ensure impartiality in the management of the file, who shall be replaced by the person designated as alternate.

- Entrust the investigation of the case to an external expert with sufficient experience in the matter, who will maintain the utmost confidentiality and follow the guidelines established in this protocol.

Particularly complex cases, when deemed necessary by the majority of the members of the committee, an external expert in the field may be called upon to provide support and advice without the need for any of the aforementioned circumstances to be present.

Basic operating rules of the Commission

- The Committee shall meet no later than 3 working days following the date of receipt of a communication, complaint or report of a possible case of harassment.
- Cases that are not concluded in the preliminary stage, and are processed in the formal stage, will be concluded with the preparation of a report summarizing the facts reported, the investigations carried out, the conclusions reached and, where appropriate, the proposed corrective actions. This report will be reported to the company's governing bodies by the head of the GRC department, where appropriate.
- The documentation and reports that make up the investigation of each case will be kept by the management of the GRC department.

2.3 Preventive Measures

Neinor Homes promotes working conditions that prevent the commission of all kinds of illegal or illicit conduct in its facilities and among its employees, especially harassment, with a particular emphasis on sexual harassment and gender-based harassment, in accordance with the provisions of Article 12 "Prevention and awareness in the workplace" of Organic Law 10/2022, of September 6, on the comprehensive guarantee of sexual freedom.

It is the fundamental responsibility of all senior and middle management to ensure a suitable working environment, free of behaviours that may negatively influence the well-being of employees, within their respective areas of responsibility and control. They will be the first line of defence against harassment, bringing it to the attention of the investigating committee if deemed appropriate, and adopting the necessary reactive measures to interrupt such behaviours at an early stage.

In addition, a series of preventive measures are established aimed at creating a safe work environment and working conditions, raising awareness among all employees, and creating an environment in which harassing behaviours can be detected and reported.

- Distribution of this protocol to all employees at the time of its publication and subsequent updates and making it available to all employees for consultation.
- Promote the awareness and sensitisation of the workforce, by providing training and information on a regular basis on the principles and values to be respected.
- Inclusion, in the annual Ethics and Compliance trainings that are already in place, of training on inappropriate conduct and on the procedures of this anti-harassment protocol.

- Periodic work climate and psychosocial risk assessments shall include issues related to harassment, sexual harassment, and gender-based harassment.
- Promote an environment of respect and correctness in the work environment, encouraging the values of equal treatment, respect, dignity, and free development of personality in all personnel, especially in positions of greater responsibility.
- Favour the integration of new employees, by avoiding situations of isolation, monitoring the worker, not only during the initial reception process, but also after it.
- Inclusion of this protocol in the "Welcome Pack" received by new Neinor Homes employees to raise awareness on this issue.

These preventive measures may be modified and expanded periodically to meet the needs of the company and its employees in this regard, especially if deficiencies are detected after having received a communication regarding a possible case of harassment.

3. Procedure for the investigation of harassment cases

3.1 Initiation of the procedure: receipt of a communication or a complaint

Any behaviour that could be considered harassment may be reported by the victim or witnesses of such behaviour preferably through the Neinor Homes Ethics Channel, in order to maintain absolute confidentiality (<https://neinorhomes.integrityline.com/frontpage>). Exceptionally, these events may be reported to any of the members of the Committee, who must report this communication to the other members of the Committee immediately and leave in writing the full content of the communication received.

Confidentiality is guaranteed in the processing and management of the communications received. In order to ensure the diligent and complete processing of communications, these must include the name and contact details of the victim of harassment, and therefore anonymous complaints where the person making the communication is the victim will not be accepted. Anonymous reports made by witnesses of harassing behaviour will be accepted, provided that they include the details of the victim.

Minimum contents of a communication:

- Details of the victim of the reported behaviour.
- Detailed description of the facts, including, if necessary, attachments that serve to prove the veracity of the communication or to facilitate the investigation process.
- Details of the person alleged to have committed the acts described.
- Details of any witnesses to the behaviour.

No measures of any kind will be taken for communicating a situation of harassment suffered or known, or indications of a behaviour that can constitute harassment, as long as there is no bad faith or false allegations. All communications received will be presumed to be true, a principle that will mark the lines of action of the investigating committee.

3.2 Preliminary or informal stage

The objective of this stage is to solve the problem in an agile way, achieving the interruption of the situation in an immediate and effective way. It basically consists of informing the person denounced of the situation that has generated their behaviour, and mediate between the parts, trying to prevent the situation from recurring.

When a complaint is received, the investigating committee will interview the victim and the alleged aggressor, together or separate. The latter will be informed of the consequences, intentional or not, that his/her behaviour is causing to the victim and possibly to other people in his/her environment, which in many occasions is sufficient and effective to solve the situation and avoid its repetition.

Once this interview phase has ended, and within a maximum period of 15 days, the investigating commission will meet to conclude the preliminary stage, either by closing the procedure or moving on to the formal stage, leaving a written record of the proceedings and the conclusions. The case may be closed at this stage with the consent of the victim, which must be recorded in writing in said record, but only in those cases in which the Commission has found that there was no sexual or discriminatory harassment of any kind and that there is no risk of reoccurrence.

The preliminary stage is optional for all parties, and may be bypassed, going directly to the formal stage, in the following cases:

- The investigating committee considers that it is preferable to proceed directly to the formal stage in order to safeguard the victim's welfare and avoid causing further harm to them.
- The complaint is related to a member of senior management or of the investigating committee itself, or there are conflicts of interest or indications of it.
- In cases of special complexity that require an in-depth analysis and/or the collaboration of an external third party collaborator.
- If the victim so requires, as long as it is justified by the seriousness of the facts and the damage caused.

3.3 Formal stage

The formal stage constitutes a process through which the commission will analyse the situation denounced with the necessary detail to clarify the facts reported. The formal stage of the procedure applies to cases which:

1. Could not be resolved satisfactorily for the victim in the informal phase, or in which there is a risk of reoffending by the harassing person.
2. Those cases in which the Commission has detected harassment in the workplace of any kind or sexual harassment, or indications thereof.
3. The informal stage was not initially activated in the cases described above.

During the formal stage, the investigating committee shall conduct as many interviews, technical analyses or actions as may be necessary to clarify the facts reported, hearing all the parties,

witnesses, and other persons it deems necessary. All persons interviewed shall be informed of their duty to maintain confidentiality regarding the procedure and the people involved in it.

All actions carried out in the formal stage shall be subject to the strictest confidentiality, especially with regard to the victim of harassment, and access to the information and work carried out shall be limited to the members of the investigating committee to the extent strictly necessary. The committee may delegate the appropriate analyses and investigations to the internal audit department and, under the terms described above, may also request the support of an external expert, who must also respect the same obligations.

The commission will have a period of one month to carry out this analysis and investigation, after which it will draw up, within this period, a report detailing, among other things, a summary of the situation denounced, detailing the persons involved, the actions and investigation carried out by the commission itself, the background and circumstances of the case, and the measures proposed, including disciplinary measures, where appropriate.

According to the Commission's conclusions in this report, the formal phase may be concluded in three ways:

- If the investigating committee reveals the existence of harassment against an employee, the director of the GRC department will submit the report prepared by the committee to the governing bodies, informing the Management Committee and presenting the corrective measures proposed in the report to the Remuneration and Appointments Committee, the Audit Committee or both, in accordance with their internal procedures and depending on the nature of each case, for ratification, after which, if appropriate, such corrective measures will be applied.
- If, though harassment has not been detected as described in this protocol, there is evidence of behaviour constituting work-related misconduct, or behaviour that could be considered harassment if it were to occur repeatedly, the proposed minor disciplinary measures may be applied without the need to submit the report to the governing bodies.
- Where the existence of behaviour constituting harassment or indications thereof has not been rationally accredited after a thorough investigation has been carried out, the report shall be archived without the need to be reported to the governing bodies, closing the case and informing the parties within the established deadline.

3.4 Precautionary measures

As soon as the evidence of harassment is confirmed, the investigating committee may apply precautionary measures in order to protect the victim and immediately interrupt the harassing behaviour, such as the separation of the victim and the alleged harasser, paid leave or reorganisation of working hours or work tasks. These measures will be of particular importance during the period in which the Commission carries out its analyses and investigations, in order to ensure the safety of the victim.

In no case shall these precautionary measures entail any prejudice or undermining of the victim's working conditions, nor a substantial modification of these in the medium or long term.

3.5 Corrective measures

The specific disciplinary measures to be applied in each case will be determined in accordance with the provisions of the disciplinary regime of Neinor Homes, according to the nature of the facts of each case, and may constitute misconduct of varying severity. Sexual harassment, harassment based on sex and discriminatory harassment shall in any case constitute a very serious offence. Harassment on grounds of racial or ethnic origin, religion or belief, disability, age or sexual orientation and sexual harassment or harassment on grounds of sex may constitute grounds for disciplinary dismissal in accordance with Article 54.g of the Workers' Statute.

Any employee who reports a false communication in bad faith will also be subject to disciplinary corrective measures.

Independently of the disciplinary measures proposed, other measures aimed at protecting the victim and repairing the damage caused by the harassment situation can also be proposed, such as:

- Psychological assistance.
- Legal counselling.
- Social and workplace follow-up and support.

The area responsible for applying corrective measures will be the Neinor Homes Human Resources department. Disciplinary measures may only be applied once the corresponding governing bodies have been duly informed by the GRC department, in those cases in which these bodies are informed.

When the harassing person is not an employee of Neinor Homes, but a third-party collaborator, thus remaining outside the power of the company and therefore unable to apply its disciplinary regime, the company may contact said third-party collaborator in order for them to adopt the appropriate measures to resolve the situation and prevent it from recurring. The contracts signed by the company with third party collaborators shall contain clauses to foresee these situations, with the possibility of termination of the commercial relationship if measures were not taken in this respect.

The Committee shall monitor, within a period of between four and eight weeks from the closure of the case, those cases in which the existence of effective harassment has been determined, evaluating compliance with and the result of the measures.

4. Continuous improvement

This protocol will be in a phase of continuous improvement throughout its period of application, so that if, after having detected a case of harassment, it is considered that the procedures and measures detailed herein are insufficient or inadequate, they shall be reviewed and modified according to the requirements of any given moment, always with the aim of strengthening the preventive, detective and reactive mechanisms against situations constituting harassment in any of its forms.

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