

An abstract graphic design featuring several large, stylized eyes in various shades of gray and white. Some eyes are set within circular frames, while others are more integrated into the background. Silhouettes of human figures are scattered throughout, including one sitting with a laptop and another standing. The background is a mix of light and dark gray tones with some faint, repeating patterns. A prominent red horizontal band is positioned across the middle of the image, containing the title text.

*Guide - Procedure for reporting  
discrimination, harassment, bullying and  
other inappropriate behaviour*

# Purpose of the procedure

The purpose of this procedure is to:

- Promote respect for the dignity and individual freedom of all employees.
- Prevent and manage incidents of discrimination, harassment, bullying and any other form of abuse by ensuring a transparent, anonymous and confidential reporting process.

# Key Definitions

- **Discrimination:** Any conduct that, directly or indirectly, places a person at a disadvantage on the basis of gender, pregnancy, maternity, care of disabled family members or other protected circumstances.
- **Harassment:** Unwanted behaviour that violates the dignity of a person, creating an intimidating, hostile or offensive working environment. Harassment may be sexual in nature or related to the person's gender.
- **Mobbing:** Series of hostile or persecutory behaviour directed towards an employee, causing him/her psychological or physical distress.



# Means of reporting

Employees can report incidents of discrimination, harassment or bullying through an online reporting tool.

The system makes it possible to:

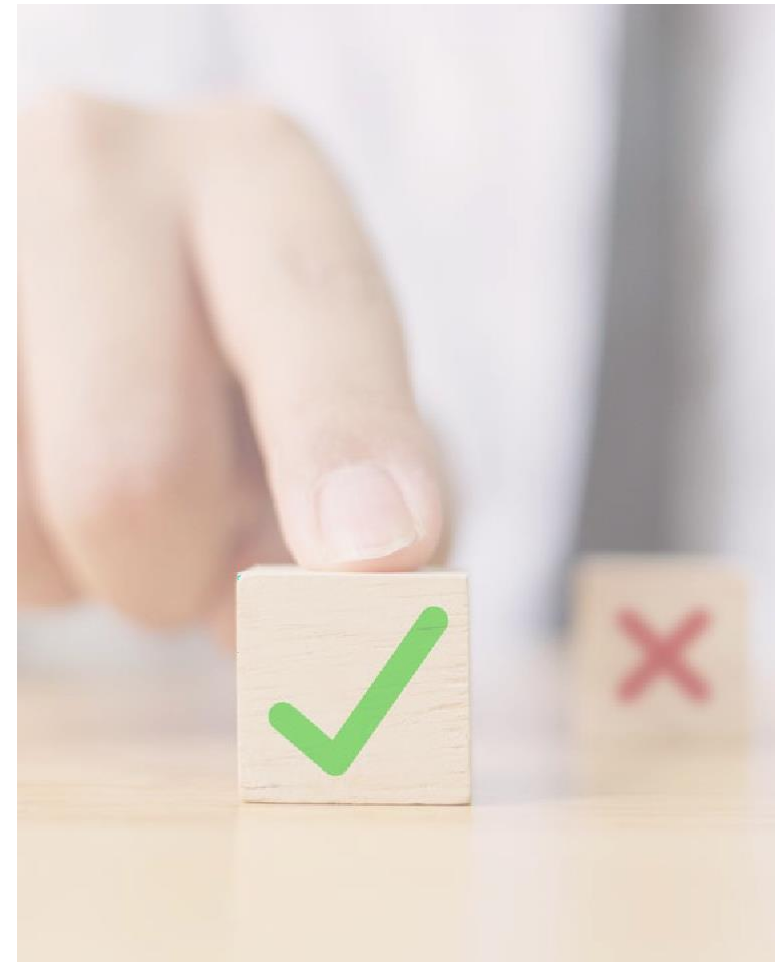
- Send a report relating to incidents experienced or witnessed via an online platform, accessible at <https://klopman.whistlelink.com/>.
- Choose to record an audio message lasting up to 10 minutes.

Reports can also be submitted anonymously.

# What to report

The reports may pertain to:

- Direct or indirect discriminatory behaviour.
- Incidents of sexual, physical or verbal harassment, including offensive language, unwanted physical contact, or the dissemination of sexual content in the workplace.
- Acts of bullying or other forms of abuse or prevarication.



# How to send the report

- Access the reporting system via the link <https://klopman.whistlelink.com/>.
- Fill out the form with precise and circumstantiated details.
- Alternatively, record an audio file with the appropriate functionality on the platform.

# Steps in the report handling procedure

- The external operator of the online platform performs an initial analysis of the report and, after verifying the scope, assigns the report to the Steering Committee.
- A member of the Steering Committee is in charge of the investigation.
- A thorough investigation is carried out.
- The Committee assesses the action to be taken, which may include internal disciplinary measures or reporting to the competent authorities.

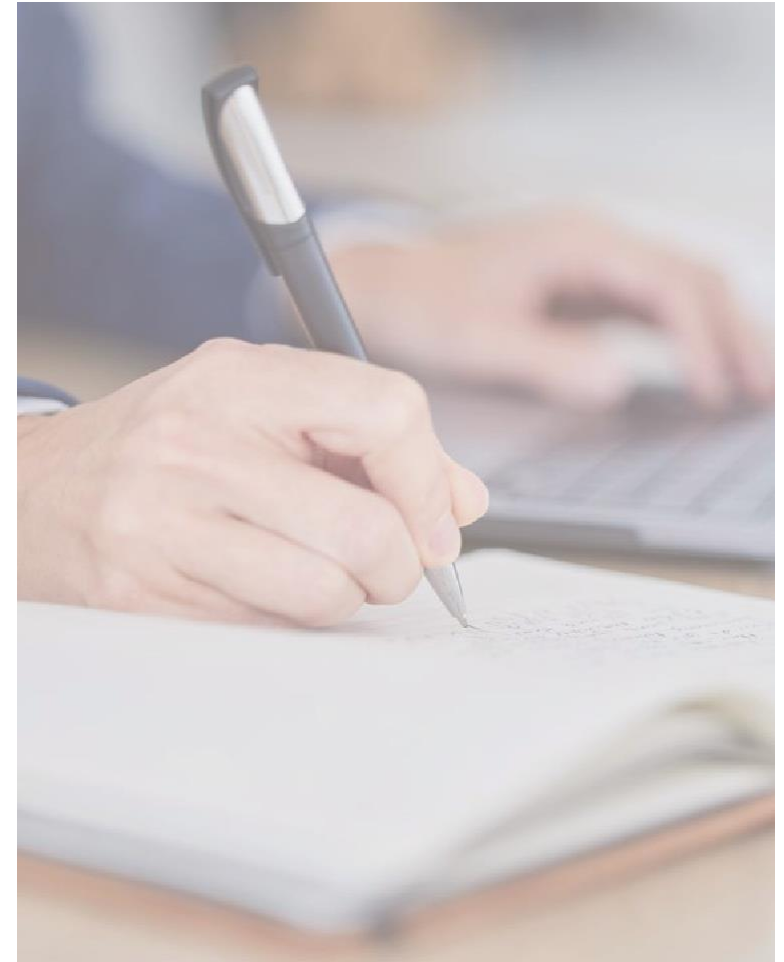
# Confidentiality and support

The company guarantees the absolute confidentiality of all reports.



# Reporting and data analysis

On an annual basis, the Steering Committee submits a report to the Management with a summary of the reported incidents, in order to identify possible organisational critical issues and prevent further incidents.



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*Thank you for your attention!*