



**PROTOCOL FOR THE PREVENTION AND
ACTION AGAINST SEXUAL AND/OR WORKPLACE
HARASSMENT, INCLUDING GENDER-BASED
HARASSMENT**

WORLD LEADERSHIP ALLIANCE CLUB DE MADRID

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BACKGROUND, OBJECTIVES AND SCOPE.

BACKGROUND

WORLD LEADERSHIP ALLIANCE CLUB DE MADRID (hereinafter "the Organization" or "CdM") approved in 2021 its first Protocol for the prevention and handling of workplace, sexual, and gender-based harassment and other forms of discrimination. Given the time that has elapsed and the approval of new relevant legislation, a new version of this Protocol has been drawn up, which includes, apart from the additions and modifications resulting from legislative changes, updated language and a revised document structure in accordance with the current best practices. Additionally, the action procedure has been updated to include the use of the Ethical Channel as a means for lodging complaints and the handling of the procedure by a third party external to the organization, in order to comply with the necessary impartiality and objectivity required for this type of procedure.

OBJECTIVES

The purpose of this Protocol is to prevent and eradicate situations that constitute harassment, in all its forms, and for the Organisation to take responsibility to prevent conduct contrary to the dignity and values of the individual. To this end, this Protocol considers two fundamental aspects: the prevention of harassment and the organisation's reaction to complaints of harassment. To this end, two types of actions are contemplated:

1. Adoption of measures through which CdM seeks to prevent and avoid situations of harassment or situations that may constitute harassment.
2. An internal procedure for cases where a complaint or internal complaint of harassment is made by an employee.

This protocol does not preclude the victim's right to lodge a complaint at any time with the Labour and Social Security Inspectorate, or with civil, labour, or criminal courts.

SCOPE OF APPLICATION

The Protocol shall be applicable to all the Organisation's employees, regardless of their employment relationship with CdM. The Protocol deals specifically with internal situations that may arise between the Organisation's employees, including supervisors and management.

The following considerations will be taken into account for situations affecting third parties or the associates (Members) of CdM:

Situations affecting third parties

When the actions of a member of staff, in the course of their work for the Organisation, affect a person who is not a member of the staff, in any of the situations described in this Protocol, the Organisation undertakes to cooperate with the complainant and the Organisation to which he/she may belong in order to clarify the facts, following a procedure similar to the one described in this Protocol for internal situations, and adopting, if necessary, the appropriate disciplinary measures in line with the provisions of this Protocol for such internal situations.

Situations caused by third parties

When the person reported is a non-staff member (e.g., a supplier, activity partner, donor, activity participant, etc.), the Organisation shall endeavour, to the extent possible, to follow the procedures described below, seeking, where appropriate, the cooperation of the Organisation to which the reported person belongs. Appropriate action will be taken, including legal action, if necessary. Depending on the outcome of the procedure, appropriate measures will be taken that may affect both the person reported and, if applicable, CdM's relationship with the Organisation to which they belong.

Situations caused by members

If the person reported is one of the Organisation's Members, the Secretary General shall inform the President of the Organisation so that they may take the appropriate action to deal with the situation. If the President is the person reported, the Vice-Presidents of the Organisation shall be informed. The person making the complaint, the Human Resources Director and the workers' representatives shall also be informed of this procedure and of the decisions taken.

1. CHARACTERISTICS AND STAGES OF THE PROTOCOL FOR THE PREVENTION AND ACTION AGAINST SEXUAL AND/OR WORKPLACE HARASSMENT, INCLUDING GENDER-BASED HARASSMENT.

In order to fulfil the commitment established at the start of this protocol and under the terms outlined so far, **WORLD LEADERSHIP ALLIANCE CLUB DE MADRID** implements a procedure for the prevention and response to sexual and/or workplace harassment, including gender-based harassment. This procedure aims to establish a mechanism for comprehensive and effective action against any conduct that may constitute harassment. To this end, this protocol combines the three types of measures established in Section 7 of the Annex of RD 901/2020, of 13 October:

1. **Preventive measures**, with a declaration of principles, definition of sexual and/or workplace harassment, including gender-based harassment, and identification of conduct that could constitute harassment.
2. **Proactive or procedural measures** to address harassment by providing a channel for complaints or reports, as well as precautionary and/or corrective measures that may be applicable.
3. Identification of **reactive measures** to address harassment and, where appropriate, the disciplinary system.

1.1. PREVENTIVE PROTECTION AGAINST.

A1.- Declaration of principles: Zero tolerance for conduct constituting sexual and/or workplace harassment, including gender-based harassment.

CdM formalizes the following declaration of principles, to emphasize the expected nature of relationships among the Organization's personnel and the conduct that is deemed unacceptable within the Organization.

This procedure applies to all conduct constituting sexual and/or workplace harassment, including gender-based harassment. It also covers conduct occurring in digital environments, as well as any other conduct against sexual freedom and moral integrity established in Law 15/2022 of 12 July on equal treatment and non-discrimination and Law 10/2022 of 6 September on the comprehensive guarantee of sexual freedom. It also includes conduct reflecting LGBTIphobic views or inciting LGBTIphobia that may occur within **CdM**.

By implementing this procedure, **CdM** commits to preventing, not tolerating, combating, and addressing any occurrences of sexual and/or workplace harassment, including gender-based harassment, within its organization.

Harassment is, by definition, a multi-faceted offence that impacts several legal interests, notably the dignity of the employee, which represents the affirmation of the right to life and to physical, mental, and moral integrity. Although the impact on dignity does not preclude an act of this nature from causing harm to other legal interests, such as equality and the prohibition of discrimination, honour, personal image, privacy, health, etc., it remains, by definition, an act that is contrary to dignity. Sexual harassment and gender-based harassment always impact the dignity of the person who experiences it and constitute gender-based discrimination.

Within **CdM**, conduct that may constitute sexual and/or workplace harassment, including gender-based harassment in any form, as well as any other conduct contrary to sexual freedom and moral integrity, will neither be permitted nor tolerated. The Organization will impose penalties on both those who engage in offensive conduct and those who promote, encourage, or tolerate such behaviour.

All personnel within the Organization must respect the fundamental rights of everyone within **CdM**, as well as those who provide services to it. Specifically, they should avoid conduct that undermines dignity, privacy, and the principles of equality and non-discrimination, and should consistently foster respectful conduct.

Notwithstanding the above, if any employee believes they are being harassed or becomes aware of a situation involving sexual and/or workplace harassment, including gender-based harassment, they have the right to lodge a complaint or report. This will activate the protocol as an internal, confidential, and swift procedure aimed at eradicating the harassment and addressing its effects.

Once the corresponding fact-finding process is completed and if sexual and/or workplace harassment, including gender-based harassment, is confirmed, **CdM** will impose penalties as appropriate. The organization commits to using its full management and disciplinary authority to ensure a work environment free from violence, sexist conduct or gender-based discriminatory behaviour and in line with principles of workplace health and safety.

B1.- Concept and conduct constituting sexual and/or workplace harassment, including gender-based harassment.

Definition and conduct constituting sexual harassment.

DEFINITION OF SEXUAL HARASSMENT

Without prejudice to the provisions of the Criminal Code, for the purposes of this protocol **“sexual harassment is any form of verbal, visual or physical conduct of a sexual nature which aims to or has the effect of violating a particular individual’s dignity, creating an intimidating, degrading or offensive environment”**.

All sexual harassment will be considered discriminatory.

Conditioning a right or an expectation of right on acceptance of a situation constituting sexual harassment will also be considered an act of gender-based discrimination.

By way of example, sexual harassment includes but is not limited to the following conduct:

VERBAL CONDUCT:

- Alleged sexual advances, propositions or pressure for sexual activity;

- Offensive flirtations;
- Insinuating remarks, innuendoes or obscene comments;
- Unwanted phone calls or contacts through social media.
- Jokes or comments about sexual appearance.

NON-VERBAL CONDUCT:

- Displaying sexually suggestive or pornographic photos, objects, or written materials, as well as lewd looks or gestures.
- Offensive letters or emails, or messages on social media with explicit sexual content.

PHYSICAL BEHAVIOUR:

- Deliberate and unsolicited physical contact, unwanted hugs or kisses, and excessive and unnecessary physical proximity.

"QUID PRO QUO" SEXUAL HARASSMENT OR SEXUAL BLACKMAIL

Conduct constituting sexual harassment includes "quid pro quo" sexual harassment or sexual blackmail, which involves pressuring the victim to choose between complying with sexual demands or losing or having certain work benefits or conditions negatively affected. This can impact access to professional training, continued employment, promotion, remuneration, or any other related decision. Since it involves an abuse of authority, the harasser is someone who has the power, either directly or indirectly, to grant or withdraw a work benefit or condition.

ENVIRONMENTAL SEXUAL HARASSMENT

In this type of sexual harassment, the harasser creates an intimidating, hostile, degrading, humiliating, or offensive environment for the victim through unwanted sexual attitudes and behaviours. It can be perpetrated by any member of the Organization, regardless of their position or status, or by third parties who are in some way located in the work environment.

C1.- Definition and conduct constituting workplace harassment, including gender-based harassment.

Definition of gender-based harassment

“Gender-based harassment is any conduct carried out on the basis of a person's gender, which aims to or has the effect of violating their dignity and creating an intimidating, degrading, or offensive environment”.

All gender-based harassment will be considered discriminatory.

To determine that a specific situation qualifies as workplace harassment, including gender-based harassment, several key elements that form a common denominator must be present, including:

- a) Harassment, understood as any intimidating, degrading, humiliating, or offensive behaviour originating externally and perceived as such by the person experiencing it.
- b) An objective assault on the victim's dignity, subjectively perceived as such by the victim.
- c) A multi-faceted harm. The attack on the dignity of someone experiencing workplace harassment, including gender-based harassment, does not preclude harm to other fundamental rights of the victim, such as the right to be free from discrimination, or violations of mental and physical health.
- d) That it is not an isolated incident.
- e) In the specific case of gender-based harassment, the conduct must be related to the fact that the victim is a woman or to circumstances that biologically can only affect them (such as pregnancy, maternity, or breastfeeding), or to reproductive and caregiving roles that, due to social discrimination, are presumed to be inherently associated with women. In this sense, gender-based harassment can also be experienced by men when they perform roles, tasks, or activities traditionally associated with women. For example, a male employee who is harassed for taking on caregiving responsibilities for children or dependents.

Conditioning a right or an expectation of right on acceptance of a situation constituting gender-based harassment will also be considered an act of gender-based discrimination.

CONDUCT CONSTITUTING WORKPLACE HARASSMENT, INCLUDING GENDER-BASED HARASSMENT

By way of example, and without being exhaustive or restrictive, the following

specific behaviours, **if they meet the criteria previously outlined** and occur repeatedly, could constitute workplace harassment, including gender-based harassment:

ATTACKS THROUGH ORGANIZATIONAL MEASURES

1. Evaluating the person's performance in an offensive manner, and concealing their efforts and skills.
2. Questioning and undermining the person's decisions.
3. Not assigning any tasks, or assigning meaningless or demeaning tasks.
4. Withholding or hiding resources needed to perform the job, or providing incorrect information.
5. Assigning tasks that are either far above or below the person's skill set or qualifications, or that require much lower qualifications than those possessed.
6. Orders that are contradictory or impossible to carry out.
7. Theft of belongings, documents, work tools, deleting computer files, tampering with work tools to cause harm, etc.
8. Threats or pressure on individuals who support the person being harassed.
9. Manipulation, withholding, or misdirecting the person's correspondence, calls, messages, etc.
10. Denial or difficulty accessing permissions, courses, activities, etc.

ACTIONS AIMED AT ISOLATING THE RECIPIENT

1. Changing the person's location to separate them from their colleagues (isolation).
2. Ignoring the person's presence.
3. Not speaking to the person.
4. Restricting colleagues from speaking with the person.
5. Not allowing the person to express themselves.
6. Avoiding all eye contact.
7. Eliminating or restricting the communication tools available to the person (phone, email, etc.).

ACTIONS THAT AFFECT THE VICTIM'S PHYSICAL OR PSYCHOLOGICAL HEALTH

1. Threats and physical aggression.
2. Verbal or written threats.
3. Shouting and/or insults.
4. Intimidating phone calls.
5. Provoking the person to force an emotional reaction.
6. Intentionally causing expenses to harm the person.
7. Causing damage to the person's workstation or belongings.
8. Forcing the person to carry out work that is dangerous or harmful to their health.

ATTACKS ON PRIVACY AND PERSONAL OR PROFESSIONAL REPUTATION

1. Manipulating personal or professional reputation through rumours, defamation, and ridicule.
2. Implying that the person has psychological issues or attempting to coerce them into undergoing a psychiatric evaluation or diagnosis.
3. Mocking their gestures, voice, physical appearance, disabilities, or giving nicknames, etc.
4. Criticizing nationality, political or religious beliefs, private life, etc.

D1.- Definition and conduct constituting harassment in the digital environment.

When the conduct referred to in this protocol takes place using information and communication technologies through digital media (where physical contact between the aggressor and the person considered a victim is not necessary), we are dealing with digital harassment or cyber violence.

Meanwhile, following the recommendations outlined in the first report of **GREVIO (Group of Experts on Action against Violence against Women and Domestic Violence)**, the following should be taken into account:

We define **DIGITAL HARASSMENT** in the workplace as the inappropriate use of

technologies, digital media, and online platforms to harass, intimidate, defame, threaten, or otherwise target a person in the traditional work environment through digital means, rather than always in person.

Conduct constituting harassment in the digital environment include:

Unsolicited messages: Sending emails, instant messages, SMS, or social media messages with offensive, intimidating, or defamatory content.

Cyberbullying: Using social media, forums, blogs, or any other digital platform to defame, mock, or damage the reputation of the person being harassed.

Online intimidation: Direct or implied threats made through digital media.

Dissemination of private information: Sharing confidential or private information of the victim without their consent, such as photos, videos, personal data or private conversations.

Creation of fake accounts: Creating fake profiles on social media or digital platforms in order to harass or defame the victim.

Manipulation of information: Altering or editing photos, videos or any other digital material for the purpose of defaming or ridiculing the person being harassed.

Harassment through videoconferences: Interrupting virtual meetings, making offensive comments, or engaging in inappropriate actions during video meetings.

Improper use of monitoring technologies: Abuse of surveillance software or applications to control, spy on, or invasively harass an employee.

Digital exclusion: Intentionally excluding a person from workgroups, chats, or collaborative platforms as a form of marginalization.

Inappropriate comments or jokes: Using digital media to share or spread jokes, memes, or comments that are offensive or discriminatory.

Digital harassment in the workplace is as serious as traditional workplace harassment and has repercussions for both the mental and emotional health of the victim and the overall work environment. Therefore, it is essential to establish clear policies against digital harassment and promote a safe and respectful work environment for all employees.

E1.- Criminal conduct contrary to sexual freedom and moral integrity.

Article 12 of the Organic Law of 6 September, on the comprehensive guarantee of sexual freedom, stipulates that all organizations must promote working conditions that prevent the commission of crimes and other conduct contrary to sexual freedom and moral integrity in the workplace. It should be noted that when the conduct constitutes a criminal offence, the Organization will take all precautionary measures to protect the victim and will urgently refer the matter to the public prosecutor's office.

Among the most significant criminal conduct, it is important to distinguish between that which violates moral integrity and that which infringes on sexual freedom.

Crimes against moral integrity, outlined in Article 173 of the Criminal Code, which in summary establishes that: *"Anyone who subjects another person to degrading treatment, significantly undermining their moral integrity, will be punished with imprisonment ranging from six months to two years... The same penalties apply to those who, in any employment or official relationship and exploiting their position of superiority, repeatedly engage in hostile or humiliating acts that, while not amounting to degrading treatment, constitute severe harassment of the victim... The same penalties also apply to those who address another person with sexual expressions, behaviours, or propositions that create a humiliating, hostile, or intimidating situation for the victim, without constituting more serious crimes"*.

Crimes against sexual freedom are included in Title VIII of the Criminal Code.

1.2 ACTION PROCEDURE.

A2.- Lodging of the complaint, activation of the protocol and processing of the administrative proceedings.

1) The Organization provides all individuals who are victims of sexual and/or workplace harassment, including gender-based harassment or digital harassment, or any other conduct contrary to sexual freedom and moral integrity, including those inciting LGBTphobia, with access to the **Ethical Channel** (or Whistleblowing Channel) at the following addresses:

<https://clubmadrid.canales-eticos.com>

and via the CdM website at <https://clubmadrid.org/ethical-channel/>

The nature and functioning of the Channel are explained in more detail in Chapter 6.

This communication channel is enabled so that it can be used, even anonymously, and the procedure, after the complaint has been lodged, will be investigated by a third party external to our Organization in order to comply with the necessary impartiality and objectivity required for this type of procedure.

In this way, the person overseeing the procedure will receive the complaint and will carry out the appropriate investigation, for which it is vital that the informant provides as much information and evidence as possible for assessment. The findings of the person overseeing the procedure will be submitted to the Human Resources Department of the Organization for the appropriate action or decisions. If the person being reported is the Director of Human Resources, the procedure will be overseen by the Secretary General of the Organization or by someone he/she designates.

If the person being reported is the Secretary General of the Organization, the procedure will be overseen by a member of the Board of Directors designated for this purpose, or, if no such designation is made, by another member of the Board, a full member, or an external individual with the required qualifications, appointed by the President of the Organization.

2) Confidentiality must be guaranteed regardless of how the complaints are processed. Upon receiving a complaint, the person handling it will assign a numerical code to the complainant for tracking the progress of the case through the digital platform.

3) Upon receipt of the complaint, its processing will begin within a maximum of 2 business days.

4) The person investigating the complaint or report of harassment will conduct a prompt and confidential investigation within 10 business days. This investigation will include interviewing the affected individuals and any proposed witnesses, as well as requesting any necessary documentation, while adhering to personal data protection regulations and confidentiality requirements. Individuals who are requested to provide information must cooperate with the utmost diligence.

In all cases, impartiality will be ensured, with the person handling the investigation remaining completely unbiased and objective throughout the process.

5) During the processing of the case, the victim will be heard first, followed by the person being reported. Both parties involved may be accompanied by a trusted individual, who may or may not be a legal or union representative, and must maintain confidentiality regarding the information to which they have access.

6) The procedure should be as swift and effective as possible, while ensuring the privacy, confidentiality, and dignity of the affected individuals, as well as the right of reply of the person being reported. Throughout the entire procedure, strict confidentiality will be maintained, and all internal investigations will be conducted with sensitivity and respect.

Both the complainant and the victim, who will not be subjected to any adverse treatment for their actions, and the person being reported, whose guilt will not be presumed, will be treated with due respect. All individuals involved in the process are required to maintain confidentiality and keep confidential any information to which they have access.

7) During the processing of the case, based on the investigator's recommendation, the Organization's management will implement the necessary **precautionary measures** to immediately stop the harassment. These measures must not result in permanent or definitive harm to the working conditions of the individuals involved. Without prejudice to other precautionary measures, the management of **CdM** will separate the alleged harasser from the victim.

8) Upon completion of the investigation, the person handling the case will prepare a report summarizing the facts, testimonies, evidence gathered, and will conclude whether, in their opinion, there are indications of harassment.

If the evidence indicates the presence of harassment, the investigator will recommend to the Organization that appropriate disciplinary measures be taken, which could include proposing the dismissal of the harasser if the situation is deemed very severe.

If the evidence does not indicate any signs of harassment, the report will state that the evidence specifically reviewed does not suggest the presence of harassment.

If, although no harassment is deemed to exist, the investigation identifies inappropriate behaviour or a conflict situation that, if persistent, could potentially lead to harassment, this will also be communicated to the Organization's management. Recommendations will be made for appropriate measures to address and resolve the situation.

9) None of the actions taken will prevent the involved parties from pursuing any judicial, administrative, or other types of measures they deem appropriate.

B2.- Resolution of the harassment proceedings

The Management of **CdM**, once it has received the conclusions of the investigator, will make the decisions it deems appropriate within 3 working days, as the only entity authorized to make such decisions. The decision made will be communicated in writing to the victim, the accused, and the investigator.

Likewise, the final decision in the case will also be communicated to the person responsible for occupational risk prevention. In this communication, in order to guarantee confidentiality, no personal data will be provided and the numerical codes assigned to each of the parties involved in the case will be used.

In light of the conclusions report prepared by the investigator, the Management of **CdM** will proceed to:

- a) close the proceedings, drawing up a report on the matter.
- b) take whatever measures it deems appropriate based on the suggestions made by the investigators of the harassment procedure. By way of example, the decisions that the Organization may adopt in this regard include the following:
 - a. physically separate the alleged aggressor from the victim by changing their position and/or shift or working hours. Under no circumstances will the victim of harassment be required to change their position, working hours, or location within the Organization.
 - b. without prejudice to the above, if applicable and based on the results of the investigation, the aggressor will be disciplined according to the system of infractions and penalties provided in the applicable collective agreement of the Organization or, if applicable, in Article 54 of the Workers' Statute

The following penalties will be considered for the aggressor:

1. relocation, transfer, change of position, shift, or location
2. suspension of employment and salary
3. temporary limitation on promotion
4. disciplinary dismissal

If the penalty imposed on the aggressor does not involve termination of the employment relationship, the Management of **CdM** will actively monitor the employee upon their return (if suspended) or in their new position if relocated. However, in all cases, the elimination of harassment will not be achieved merely by implementing a change of position or a suspension. Ongoing monitoring and control by the Organization will be required.

The Organization's Management will take the necessary preventive measures to ensure the situation does not reoccur, enhance training and awareness activities, and implement actions to protect the safety and health of the victim, including but not limited to the following:

- Assessment of psychosocial risks within the Organization.
- Implementation of surveillance measures to protect the victim.
- Implementation of measures to prevent recidivism by those who have been disciplined.
- Psychological and social support for the harassed individual.
- Modifying the working conditions of the victim, with their consent, to those deemed beneficial for their recovery.
- Training or new career opportunities for the victim if they have been on sick leave for an extended period.

- Conducting new training and awareness programmes for the prevention, detection, and response to harassment, aimed at all individuals working within the Organization.

C2.- Follow-up.

Once the case file has been closed, and within a period not exceeding thirty calendar days, the person responsible for processing and investigating the complaint must follow up on the agreements made, specifically regarding their implementation and/or the results of the measures adopted. A report will be generated based on the results of this follow-up, which will include recommendations for further measures if the underlying issues persist. The report will also analyse whether the proposed preventive and disciplinary measures have been implemented, if applicable. This report will be sent to the Organization's management so that necessary measures can be taken. It will also be forwarded to the legal representation of the employees, if applicable, and to the person responsible for occupational risk prevention, with the confidentiality safeguards for the personal data of the affected parties as outlined in the procedure.

2. DURATION, MANDATORY COMPLIANCE, AND ENTRY INTO FORCE.

Compliance with the content of this protocol is mandatory, and it will enter into force as soon as it has been communicated to the Organization's staff through the ***MEMORANDUM FOR EMPLOYEES ON THE PROTOCOL AGAINST SEXUAL AND/OR WORKPLACE HARASSMENT, INCLUDING GENDER-BASED HARASSMENT*** Document included in section 5 of this protocol, remaining in effect for two years.

However, the protocol will need to be reviewed and updated in the following cases:

- At any time during its validity to realign the achievement of its objectives for preventing and addressing sexual and/or workplace harassment, including gender-based harassment.
- When its failure to meet legal and regulatory requirements or its insufficiency is identified following an inspection by the Labour and Social Security Inspectorate.
- In cases of merger, acquisition, transfer, or changes in the legal status of the Organization, and in the event of any significant changes to the Organization's workforce, work methods, or structure.
- When a judicial ruling condemns the Organization for sexual or gender-based discrimination or determines that the protocol does not meet legal or regulatory

requirements.

This protocol does not preclude the victim's right to lodge a complaint at any time with the Labour and Social Security Inspectorate, or with civil, labour, or criminal courts.



3. COMMITMENT OF WORLD LEADERSHIP ALLIANCE CLUB OF MADRID TO MANAGING SEXUAL AND WORKPLACE HARASSMENT, INCLUDING GENDER-BASED HARASSMENT.

With this protocol, **CdM** expresses its zero tolerance for any conduct within its organization that constitutes sexual and/or workplace harassment, including gender-based harassment.

By adopting this protocol, **CdM** aims to emphasize its commitment to preventing and addressing sexual and workplace harassment, including gender-based harassment in any of its forms. It will inform all personnel serving in the organization —whether employees, staff from other organizations, individuals who, though not employed, provide services or collaborate with the organization, such as trainees, interns, or volunteers— about its implementation.

Similarly, **CdM** commits to informing the organizations to which its personnel are assigned, as well as the organizations from which the personnel working at **CdM** come, about the existence of this protocol and the necessity of strict compliance. Thus, the obligation to adhere to the provisions of this protocol will be included in the contracts signed with other organizations.

When the alleged harasser is beyond the reach of the authority of the management of the Organisation, therefore, **CdM** cannot fully implement the procedure, **CdM** will refer the matter to the competent organization to resolve the issue and, if applicable, discipline the responsible individual. **CdM** will also warn that failure to do so may result in the termination of the business relationship between the two entities.

The protocol will apply to situations of sexual and/or workplace harassment, including gender-based harassment, that occur during work, in relation to work, or as a result of work:

- a) in the workplace, including in public and private spaces when they are considered a workplace;
- b) in places where the employee is paid, where they take breaks or eat, or where they use sanitary or hygiene facilities and changing rooms;
- c) during travel, trips, events, or social or training activities related to work;
- d) in the context of communications related to work, including those conducted through information and communication technologies (virtual or cyberbullying);

- e) in accommodation provided by the employer.
- f) when commuting between home and the workplace.

This protocol complies with the requirements of Articles 46.2 and 48 of Organic Law 3/2007 of 22 March, on effective equality between women and men; Royal Decree 901/2020 of 13 October, which regulates equality plans and their registration, and amends Royal Decree 713/2010 of 28 May, on the registration and deposit of collective bargaining agreements; and Article 14 of Law 31/1995 of 8 November, on the prevention of occupational risks.

In conclusion, **CdM**, by committing to the measures outlined in this protocol, expresses and publicizes its explicit intention to adopt a proactive stance in both the prevention of harassment —through awareness and information on conduct not tolerated by the Organization— and in the dissemination of best practices. **CdM**, is also dedicated to implementing any necessary measures to manage complaints and reports in this regard and to resolve each case as appropriate.

MADRID, 14/11/2024

RICARDO HIDALGO GARCÍA

DIRECTOR OF FINANCE AND HHRR

4. MEMORANDUM FOR EMPLOYEES ON THE PROTOCOL AGAINST SEXUAL AND/OR WORKPLACE HARASSMENT, INCLUDING GENDER-BASED HARASSMENT.

WORLD LEADERSHIP ALLIANCE CLUB DE MADRID

Calle Mayor, 69-1ªPlanta (Palacio de Cañete), 28013 - MADRID (Madrid)

Dear Sir/Madam,

The purpose of this communication is to inform you that, at **WORLD LEADERSHIP ALLIANCE CLUB DE MADRID**, we assume the highest level of responsibility and commitment to establishing, implementing, and maintaining working conditions that prevent sexual and workplace harassment, including gender-based harassment. We also undertake to implementing specific procedures for prevention and to addressing any reports or complaints that may be made by those who have been subjected to such harassment. In this regard, we would like to provide you with access to our Protocol on sexual and workplace harassment, including gender-based harassment at work. The general objective of this protocol is to prevent and address any potential harassment situations, in all their forms and modalities, that may occur within our organization. In particular, it outlines the following specific objectives:

- Clearly identify situations that constitute sexual and workplace harassment, including gender-based harassment.
- Help prevent harassment by establishing training and awareness actions.
- Identify those responsible for handling procedures and actions to be taken in cases of harassment.
- Facilitate the reporting of cases of harassment by providing employees with a whistleblowing channel and identifying to whom it should be submitted.
- Ensure confidentiality and respect for the privacy and dignity of all parties involved.
- Resolve conflicts and harassment situations by establishing a process for implementing the appropriate disciplinary measures.

All members of **WORLD LEADERSHIP ALLIANCE CLUB DE MADRID** should become familiar with the contents of the Protocol on sexual and workplace harassment, including gender-based harassment at work. This will help reduce the risk of any situations that contravene the protocol from occurring within the organization.

In this context, we hereby provide you with our Protocol on sexual and workplace harassment, including gender-based harassment at work, for you to review and acceptance.

Signature of acceptance:

Name and surname: _____

National ID no.: _____

Date: _____

Yours sincerely,

WORLD LEADERSHIP ALLIANCE CLUB DE MADRID

5. REPORTING OR WHISTLEBLOWING CHANNEL

Communications or complaints related to possible sexual and/or workplace harassment, including gender-based harassment, should be directed through the Organization's ETHICAL CHANNEL, accessible via:

<https://clubmadrid.canales-eticos.com>

and via the CdM website at <https://clubmadrid.org/ethical-channel/>

The ETHICAL CHANNEL is a Whistleblowing Channel that complies with all legislative recommendations (guaranteeing anonymity and confidentiality of the complainant's identity, and protection against possible retaliation). It is managed by an external specialized agent, AUDIDAT 3.0 S.L., a Spanish consultancy specializing in Compliance and Data Protection. It is available to anyone who has a relationship with CdM (employees, partners, directors, suppliers, customers, associates, etc.) and aims to promote regulatory compliance, with the goal of creating a climate of trust both within and outside the Organization.

The aforementioned links guide the user to the digital platform in a simple and intuitive manner for submitting new reports or communications, as well as for tracking previously submitted reports or communications.

As previously mentioned, the ETHICAL CHANNEL is managed by a third party external to CdM in order to ensure the impartiality and objectivity required by this type of procedure. In this way, the person who manages the channel will receive the complaint and will carry out the appropriate inquiry and investigation, for which it is vital that the informant provides as much information and evidence as possible for assessment. This agent will act in coordination with CdM's Management and the persons designated by the latter.

CdM wishes to emphasize that non-retaliation is guaranteed, as a result of which any type of reprisal against the whistleblower or informant is completely forbidden. Likewise, the presumption of innocence of the accused party is guaranteed until proven otherwise.

This ETHICAL CHANNEL involves reporting within the internal circles of the organization. Therefore, please keep in mind that, at all times, you may resort to external channels established by the competent bodies or authorities to report any act that may be considered a crime.

ANNEX: GLOSSARY OF TERMS AND LGBTIPHOBIA.

Glossary of terms

Mobbing: Workplace harassment. Understood as intense psychological violence directed repeatedly and over an extended period of time towards one or more individuals by others who act from a position of power, although not necessarily hierarchical in psychological terms, with the purpose of creating a hostile or humiliating environment that disrupts the victim's work life. This violence occurs within the context of a work relationship but does not address the needs of organizational structure; it constitutes an affront to the individual's dignity and poses a risk to their health.

Gender role: Social construction of what it means to be a man or a woman in society. It defines what it means to be a man or a woman. There is a cultural transmission of definitions regarding behaviour, social conduct, ways of dressing, and public interactions that vary across different cultures and historical periods.

Gender identity and sexual identity: An individual's self-identification as a man, a woman, or both. The identity process can be dynamic and subject to change, and a person's gender identity may not coincide with the identity ascribed to them by others.

Gender expression: The way a person communicates their gender identity to others through behaviour, clothing, hairstyles, voice, personal characteristics, interests, or affinities.

Biological sex: It makes reference to physical and physiological characteristics that define men and women and include primary characteristics and secondary characteristics.

Intersex: A person with sexual characteristics of both sexes.

Sexual orientation: Refers to the object of sexual desire.

Homosexuality: Sexual orientation towards individuals of the same sex.

Heterosexuality: Sexual orientation towards individuals of the opposite sex.

Bisexuality: Bisexuality is the sexual orientation of individuals who experience sexual or emotional attraction to people of more than one gender and/or sex.

LGBTI: The acronym used to collectively refer to Lesbians, Gays, Bisexuals, Transexuals and Intersex people.

Gay: A homosexual man.

Lesbian: A homosexual woman.

Transsexual: A person whose gender identity does not align with the sex assigned to them at birth, nor with their genitalia or other sexual characteristics, and differs from the identity others might ascribe to them.

Transgender: The sexual identity of these individuals does not align with the sex assigned to them at birth, nor with their genitalia or other sexual characteristics, and differs from the identity others might ascribe to them.

Cissexual or cisgender: A person whose sexual identity coincides with their biological gender at birth. It is commonly used as the opposite of transgender.

Transition process: A personal and unique process of self-affirmation of one's own identity that aims for the progressive adaptation to one's felt gender identity. It is up to each person to decide at what point this process begins. The term "**sex change**" should never be used.

Discrimination by association: A situation where a person faces discrimination based on sexual orientation, gender identity, and/or gender expression as a result of their association with an LGBTI individual or group.

Discrimination by error: A situation where a person or a group of people face discrimination based on sexual orientation, gender identity, and/or gender expression as a result of an erroneous perception or misunderstanding.

Multiple discrimination: A situation in which a lesbian, gay, bisexual, transgender, or intersex person experiences exacerbated and specific forms of discrimination due to their membership in other groups that are also subject to discrimination.

Secondary victimization: It is the additional mistreatment experienced by LGBTI individuals that falls under instances of discrimination, harassment, or retaliation as a direct or indirect consequence of shortcomings in interventions carried out by responsible organizations, and actions by other involved agents.

LGBTIphobia concepts

LGBTIphobia is a hostile attitude that rejects non-heterosexual orientations, transgender identities, and intersexuality as contrary, different, inferior, worse, or abnormal. It also views individuals who practice or embody these identities as different, strange, sick, immoral, or unnatural.

LGBTIphobia includes the following phobias: homophobia, lesbophobia, biphobia, transphobia, transphobia, effeminiphobia and intersexphobia.

Heterosexism: It consists in taking for granted, without questioning, that the norm to follow is heterosexuality, meaning that everyone should be heterosexual. This situation leads to the belief that anything that is not heterosexual is abnormally different, which can result in rejection or discrimination.

Homophobia: Refers to aversion, hatred, fear, prejudice, or discrimination against homosexual men or women, but it also includes other individuals within the sexual diversity spectrum, such as bisexual or transgender people.

Lesbophobia: Aversion, hatred, fear, prejudice or discrimination towards lesbianism or lesbians, attitudes of rejection towards lesbian women.

Biphobia: Aversion, hatred, fear, prejudice or discrimination towards bisexuality or bisexual people.

Transphobia: Aversion, hatred, fear, prejudice or discrimination towards transsexuality or trans people.

Intersexophobia: Aversion, hatred, fear, prejudice or discrimination towards intersexuality or intersex people.

Monosexism: Believing that everyone is homosexual or heterosexual. It is a biphobic attitude.

This LGBTIphobia can take various forms:

Institutional LGBTIphobia: This can range from laws that do not guarantee equality to enacting laws that punish, persecute, or penalize LGBTI individuals with severe consequences, including death.

Affective LGBTIphobia: These are feelings of rejection that arise in certain individuals when interacting with LGBTI people. Rejection often manifests as discomfort with physical contact, feeling uneasy around LGBTI individuals, or being uncomfortable with displays of affection between LGBTI people.

Cognitive LGBTIphobia: This is the belief that LGBTI people are unnatural, amoral, sinful and makes them inferior or undesirable.

Liberal LGBTIphobia: It allows the expression of sexual diversity in the private sphere, but does not accept it in the public sphere.

Behavioural LGBTIphobia: This is connected to behaviour towards LGBTI people. This behaviour can manifest itself in many ways, ranging from the mildest form of a casual joke to the most severe form of physical assault.

Externalized LGBTIphobia: This is verbal or physical behaviour, either affective LGBTIphobia or behavioural LGBTIphobia, which can lead to some form of abuse towards LGBTI people.

Internalized LGBTIphobia: This is the assimilation through heterosexual education that sexual orientation and gender identity behaviours are negative. It affects both heterosexuals and LGBTI people, the latter can have serious self-esteem problems that lead to personal invisibility.

In the workplace, other forms of LGBTIphobia can occur, such as dismissal due to sexual orientation, gender identity, or gender expression; pressuring an employee through mobbing to force them to leave the organization; failing to provide facilities for a transgender employee to have privacy; or listing an employee's assigned sex in work records or censuses, even when such information is not crucial.



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