

/ NIDEC ARISA



PROTOCOL OF PREVENTION AND ACTION OF SEXUAL HARASSMENT AND HARASSMENT BASED ON GENDER

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1. SUBJECT MATTER, SCOPE AND VALIDITY:

The protocol for preventing and acting on workplace harassment aims to define guidelines that allow us to identify a harassment situation, whether that be moral, sexual or gender-related, in order to resolve a discriminatory situation, ensuring the rights of victims at all times.

It is aimed at all persons related to Nidec Arisa S.L.U., regardless of the employment relationship, the type of contract that determines their employment relationship, the position they hold or where they work.

This protocol will be published on the company's website, available to anyone who may need it.

2. DEFINITIONS:

It constitutes moral, **work-related or "mobbing" harassment**, whereby a person (or group of people) exercises extreme psychological violence on another person in the workplace on a systematic and recurring basis for an extended period of time in order to destroy their communication networks and reputation and disrupt the exercise of their work, all of which aim to get that person to leave the workplace.

Sexual harassment is any behavior, verbal or physical, of a sexual nature that has the purpose or has the effect of attacking a person's dignity, in particular when creating an intimidating, degrading or offensive environment. (Art. 7.1 of the Organic Law 3/2007, of March 22, for Effective Equality of Women and Men)

Harassment based on gender is any conduct carried out on the basis of a person's gender, with the purpose or effect of attacking their dignity and creating an intimidating, degrading or offensive environment. (Art. 7.2 of the Organic Law 3/2007, of March 22, for Effective Equality of Women and Men)

Also, any **unfavorable treatment** related to **pregnancy, maternity, paternity or breastfeeding** constitutes direct discrimination based on gender. (Art. 8 of the Organic Law 3/2007, of March 22, for Effective Equality of Women and Men).

3. PROCEDURE:

3.1 Preventive action

The company's management will promote actions aimed at preventing and avoiding situations of harassment, such as:

- **Training** – This subject will be included in those training programmes that are suitable for this purpose, aimed at all staff and especially at people who have personnel in their charge.
- **Accountability** – According to this protocol, all employees have an obligation and responsibility to establish and maintain their relationships through respect and dignity.

Managers will additionally have the following responsibilities:

- o Ensure that the people under their charge know and understand the contents of this protocol.
- o Guarantee and ensure that no situations of harassment occur within their scope.
- **Communication** – All available means will be used to ensure knowledge of this protocol to all members of the company.

3.2 Procedures for action

3.2.1 Informal procedure

The objective of the informal procedure is to solve the problem quickly and swiftly, without the need to activate the formal procedure.

The person concerned should contact Human Resources (aperez@arisa.es).

Communication may be verbal or written. However, where the process is initiated by a third party outside of the parties (assumed author(s) and/or victim), it must be done in writing.

All reports will be treated seriously, confidentially and promptly.

HR Management directs the procedure, and appoints the instruction officer if it does not coincide with the department's own management; This appointment will be made within 5 working days.

Within a short period of time (15 days) from the appointment of the person in charge of the instruction, the procedure shall be terminated, assessing the consistency of the report, indicating whether or not the purpose of the procedure has been achieved and, where appropriate, proposing actions that are considered appropriate, including the opening of the formal procedure.

3.2.2 Formal procedure

Any person, in addition to the victim, who becomes aware of any act of harassment may report the situation to Human Resources management, using the following communication media:

- Mailbox (*): aperez@arisa.es
- Mail to Nidec Arisa, Head of HR, Pol. Ind. Lentiscales, Calle Las Balsas 4, 26370 Navarrete.
- Personal

HR Management ensure the anonymity of the person reporting.

An investigatory phase is activated, with the appointment of an instructor within the time limit set out in point 3.2.1 (in the case of being someone other than the HR management itself), and any proceedings, evidence and actions deemed appropriate to clarify the facts denounced shall be carried out, giving a hearing to all parties, witnesses and other individuals deemed to provide information, including, where appropriate, the legal representatives of the workforce.

The investigatory phase ends with the drafting of the conclusion report, which is used to make the final decision, which should be brought to the attention of the complainant and the respondent. The audience should be guaranteed to the parties involved, allowing them to make allegations and informing them of the elements, objectives and results of the procedure, and that both the complainants and the accused may be accompanied in all proceedings by a person from the Legal Representation of the workforce.

As a precautionary measure to protect the victim, and once the evidence of harassment has been verified, the separation of the victim from the alleged harasser may be determined as a precautionary measure, or any other precautionary measure deemed appropriate may be adopted.

The Human Resources management will decide on the basis of the report drawn up as a result of the results of the investigation into the grounds for the complaint, the measures to be taken to resolve the conflict, which will be communicated personally to the victim.

In order to make the procedure swift, both to end harassment conduct as soon as possible and to mitigate the possible effects on the victim and to avoid harming the interests of the reported person, a deadline for handling and resolving reports is set, which must not exceed 30 calendar days.

(*) Only Head of HR has access to this mailbox

3.3 Commitment to protecting the people involved

Commitment to protect personnel involved in the procedure and information, both in the informal and formal procedure.

The right to honor of individuals will be one of the maxims of action for all parties involved in the procedures referred to in this protocol.

Nidec Arisa formally states that it will not tolerate retaliation against those who have made use of the notification procedures regulated herein. Human Resources will immediately attend to employees who believe that the use of this procedure has caused harm to them.

The various internal units involved are subject to the same commitments and principles with regard to anonymity, confidentiality and non-retaliation, which also apply to Human Resources, and will have access to the identities of the communicators only to the extent that such information is necessary for the resolution of the corresponding investigation.

Principle of speed

It is necessary that the processing takes place urgently and that the deadlines for resolving complaints are complied with.

Confidentiality Principle

All procedures made in the procedure are confidential.

Principle of privacy protection

The procedure must protect the privacy of the person who is the victim of the harassment, as well as that of all other people involved in the procedure.

Principle of protecting people's dignity

The procedure must protect the privacy of the person who is the victim of the harassment, as well as that of all other people involved in the procedure.

4. RESPONSIBILITIES:

The Human Resources Management is responsible for the overall management of the procedure contained in this Protocol, ensuring that it is correctly implemented, disseminated, tracked and continuously improved, so that it is kept permanently updated with the actual operation.

5. ALTERNATIVES REPORTING LINES AND ETHICS COMPLIANCE HOTLINES



If you have
an ethics or
compliance
concern

**tell
someone
about it.**



Inside the US: 877-522-7545
Outside the US: +1 770-582-5264



[https://
nideccompliance.ethicspoint.com](https://nideccompliance.ethicspoint.com)



nidec_hotline_europe@nidec.com

Within the Nidec Group there are different touchpoints to report any concerns about ethics, behavior and of course sexual and/or gender harassment at work. The various addresses and telephone numbers available to all staff of the Nidec Group, which have also been distributed to all staff of Nidec Arisa by different means, are listed below.

Bribery

Sexual Harassment

Workplace Bullying and Harassment

Information Leak

Cartel

Discrimination

If you have any concerns, please report to the Hotline.

Nidec Global Compliance Hotline

- Confidential.
- No retaliation or harassment as a result of reporting.

Nidec Global Compliance Hotline - Spain

MAIL : nidec_hotline_europe@nidec.com

WEB : [http:// nideccompliance.ethicspointoom/](http://nideccompliance.ethicspointoom/)

TEL : +1 770-582-5264 English

TEL: (toll-free) Dial access code (900-99-0011) then at the prompt, dial 844-543-8359 Spanish-English



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