



Equality plan for

G.O.C., S.A.

November 2021

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1. Introduction

Presentation of the company

GENERAL DATA	
Company name	G.O.C., S.A.
Legal form	Public Limited Company
Address	Calle Doctor Canoa, 5, bajo, Vigo (Pontevedra)
Telephone	986 377 111
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G.O.C., S.A. is a company founded in Vigo in 1986 with the idea of providing services to its clients in the field of **technical assistance and quality control in the construction of buildings and infrastructures**. The following **business areas** can be distinguished:

- Management or integrated project management.
- Consultancy services, including the following:
 - Geotechnical, pathology and other sectoral studies.
 - Due diligence and expert reports.
 - Energy and sustainability studies.
 - Assistance for certification processes (LEED, BREEAM).
 - Audit and inspection of maintenance and upkeep.
 - Technical, economic and financial feasibility studies.
- Design and preparation of pre-construction works.
- Supervision: management, control and supervision of building and infrastructure works.
- Geology and geotechnical services for building and civil engineering.

Throughout its history, the company has provided services for various projects located in different parts of the world, such as Colombia, Saudi Arabia, Venezuela, Peru, Panama and Bolivia. Among the most relevant projects in which they have participated, we can highlight the City of Culture of Galicia, the hospital of Lugo, the new terminal of Madrid-Barajas or the stations of the high speed line Mecca-Medina.

The company currently has 6 work centres, located in Vigo (1), A Coruña (2), Madrid (2) and Seville (1), the main one being in Vigo.

Equality commitment

As a company committed to the implementation of equality policies, G.O.C., S.A. considers it a priority to establish and develop policies that integrate equal treatment and opportunities between women and men, without discriminating directly or indirectly on the grounds of sex, as well as to promote and encourage measures to achieve real equality within our organisation, establishing equal opportunities between women and men as a strategic principle of our Corporate and Human Resources Policy, in accordance with the definition of this principle established in the L.O. 3/2007, of 22 March, for the effective equality of women and men.

For this reason, the company promotes the elaboration and implementation of the Equal Opportunities Plan.

We face this implementation as part of our business management policies, and we want everyone to be involved and aware of its advantages, therefore, we will ensure communication (both internal and external) informing of all decisions taken in this regard, and an image of the company will be projected in accordance with this principle of equal opportunities between women and men, in order to promote awareness and awareness in favour of equality.

In order to monitor and evaluate the measures set out in the Equality Plan, a committee is set up to analyse their application and results, and the corresponding monitoring systems are set up within the committee, with the aim of making progress in achieving

real equality between women and men in the company and, by extension, in all companies with a direct or indirect relationship with G.O.C., S.A.

After all that has been said in this introduction, it can be determined that this Equality Plan will be governed by the following characteristics:

- It is based on a commitment by the company's management, ensuring the provision of human and material resources for its implementation.
- It shall apply to all staff.
- It accepts gender mainstreaming as one of its guiding principles, incorporating the gender perspective in the management of the company, understood as part of the company's strategy and policies.
- Its definition stems from dialogue and consensus between the parties, materialised in the constitution of its Equality Commission.
- It is preventive in nature, with the aim of eliminating the possibility of future discrimination within the company.
- It is internally coherent (as it is aligned with the company's strategy and activity), dynamic and open to modifications or improvements according to the needs that arise during its monitoring and evaluation.

2. Determination of the concluding parties

This Equality Plan has been developed within a **Negotiating Committee**, constituted on a parity basis in terms of representation by the staff and by the company, following at all times the provisions of Article 5 of Royal Decree 901/2020, of 13 October, which regulates equality plans and their registration and modifies Royal Decree 713/2010, of 28 May, on the registration and deposit of collective bargaining agreements and collective labour agreements.

Accordingly, the Negotiating Committee is composed as follows:

Representing the company:

- Mr. Iván Cazapal Gómez
- Mr Mateo Villaverde Sedano
- Mr. Jacobo Otero García

Representing workers:

- Ms Rosa Costas Otero (IGC)
- Ms Iria Salvande Lorenzo (CIG)
- Ms Paula Baamonde Pardo (UGT)

The parties represented in the Commission agree to fully and unconditionally adhere to the Equality Plan and sign the Final Act attached to this document.

Following the approval of this Equality Plan, the parties represented on the Negotiating Committee shall constitute a **Monitoring Committee**, establishing its internal rules of organisation and operation, which shall promote the principle of balance in its composition and the proportional representation of the trade unions present in the company's LTR (or, failing that, in the sector of reference).

3. Personal, territorial and temporal scope

The equality plan shall apply to all the company's employees, as well as, where appropriate, to temporary agency workers during their periods of service in the user company.

The territorial scope of the equality plan is national, covering all the work centres, which at the time of writing this report are:

- Centro 1, sito en Rúa Doutor Canoa, 5 baixo. Vigo (Pontevedra)
- Centro 2, located in Polígono de Pocomaco, parcela d4, M7.
- Centre 3, located in Arzúa - Valle de Aran 9.
- Centro 4, located in Madrid, Alcobendas - calle Fuencarral 44
- Centre 5, located in Madrid, Barajas - Adolfo Suárez Airport
- Centro 6, located in Sevilla - Avd. Hytassa n1.

This Equality Plan will be valid for **FOUR years** from its signature, from 18.11.2021 to 17.11.2025. The parties will begin negotiating the company's new equality plan three months before the end of the term of this plan.

4. Results of the diagnostic report (including the remuneration audit)

In order to draw up this Equality Plan, a **diagnosis of the company's situation** has been made, carrying out a detailed analysis, from a gender perspective, of the situation regarding equal opportunities between women and men in the company, through information gathering activities, analysis of internal debate and, finally, the formulation of proposals that will be included in the Equality Plan.

From the work of collecting and analysing the data by areas of intervention, a series of conclusions and proposed measures for action were drawn for incorporation into the Equality Plan. Their review and treatment was carried out by the parties within the Negotiating Committee.

The general conclusions of the diagnostic report are listed below by intervention area:

A. Selection and recruitment process.

In relation to the analysis of the selection and recruitment process, in general there is a lower participation of women than men in the selection processes carried out. This difficulty in attracting female talent may, in part, be a consequence of the current situation in the sector, where the percentage of female graduates in Engineering and Architecture is only 26.9% of the total.

To show these conclusions with data, a total of **22 incorporations were carried out during** 2020, of which 68.18% were men and 31.82% were women. In this sense, the position in which most people were incorporated corresponds to that of Technician, which reached 86.36% of the total number of incorporations, of which 54.55% were men and 31.82% were women.

In the same year, there were **21 dismissals**, 85.71% of which affected male staff and 14.29% female staff. It should be noted that these dismissals are mainly due to the restructuring carried out, through which adjustments are made in different areas of the company.

In relation to the qualitative analysis of the selection processes, it should be noted that not all the people in charge of selection have training in gender equality, and no specific effort is made to ensure that the team in charge of selection is mixed. Furthermore, while the use of gender-neutral language in job advertisements is sought, the **use of gender-inclusive language is not guaranteed** in all cases.

B. Training and career development.

In relation to the **training** given in recent years, an evolution has been detected with regard to the variety of departments addressed and the subjects taught, the most representative being IT, ORP and preventive measures and medical management of the risk of contagion by Covid. In addition, in 2020, a new procedure was implemented in relation to **career plans**. Thus, the company links the training plan and the promotion plan, so that training will depend on the promotion plan that each employee will follow (depending on his/her needs and interests). Taking into account the objectives of each employee, the career plan for each employee starts with the completion of a self-assessment survey that deals with the interests and goals to which he/she aspires within the company, as well as the line of training he/she would like to follow. Based on the results of this self-assessment, the employee meets with the head of department in order to define the objectives of his/her development/career plan and finally assign him/her the most suitable line of training.

However, once training has begun, there is currently no provision for the evaluation of staff development after three years and no system has been found to allow objective assessment during or at the end of the process to make decisions regarding **promotions**. In spite of this, the company has the criteria established by the collective agreement, where seniority, merits and organisational powers of the company are taken into account.

C. Job classification, remuneration and pay audit.

In relation to the **professional classification and remuneration policy** of G.O.C., S.A., this is regulated in accordance with the **criteria of the applicable collective bargaining agreement**.

In particular, **job classification is based on** functional criteria within the company and on the specifications of the collective agreement as set out in Article 17 of the collective agreement:

LEVEL	PROFESSIONAL GROUP	POSTS INCLUDED
I	Qualified staff	M&S Coordinators Technicians Area managers Administrative staff General Managers Inspectors responsible Commercial Management Managers
II	Administrative staff	Technicians Area managers Administrative staff Inspectors responsible
III	Technical staff and office specialists	Auxiliary Technicians Area managers Draughtsmen

LEVEL	PROFESSIONAL GROUP	POSTS INCLUDED
IV	General miscellaneous services	Auxiliary Technicians Security guards and IT staff

With regard to the **remuneration policy**, G.O.C., S.A. complies with the provisions of the applicable collective bargaining agreement, specifically those set out in articles 31 to 34. In this sense, as shown in the following table, the company applies the concepts of basic salary, collective agreement bonus and seniority, and improves these amounts regulated by the collective agreement with a voluntary bonus or supplement fixed in relation to the position and its associated functions. It should be noted that this improvement is not standardised, and the company does not have specific salary bands linked to the value or level of the posts.

Concept	Description	Type
Fixed remuneration	Includes the following payroll items: 1 - basic salary, 56 - collective agreement bonus, 120 - voluntary remuneration, 70 - allowance, 11 - difference up to guarantee S.M.I., 18 - internship grant, 187 - extra proportional part, 520 - extra payments during ERTE suspension period.	Salary
Seniority	Regulated by Art. 28 of the agreement.	Wage supplement
IT Payment	Includes the following payroll items: Enf.Emp.60%, Enf.S.S.60%, Enf.S.S.75%, AT and EP, Complement IT, 509 - complement I.T., Benefits IT.	Extra-salary
End-of-contract indemnity	Includes the following payroll items: 150 - end of contract indemnity, 174 - dismissal indemnity, 175 - non-transfer indemnity, 410 - lack of notice.	Extra-salary

In addition, and in order to be able to carry out the complete remuneration audit properly, a **job evaluation was carried out**. To this end, the information set out in the job description sheets was taken as a starting point, as well as the use of an **analytical method of scoring by factors**¹ to obtain the map of jobs of equal value.

¹ The tool made available by the Instituto de la Mujer y para la Igualdad de Oportunidades for gender-sensitive job evaluation in companies (published in January 2016, and which follows the ILO recommendations for job evaluation) has been used. This

Once the system had been defined, and each of the identified positions had been assessed, the following **score** was obtained for each of them (the classification in levels is already provided, taking as a reference intervals of 200 points on a scale of 0 to 1000).²

Scoring of posts

Post	Score	Level (grouping of posts of equal value)
Director General	800,82	LEVEL I
Director of commercial management	712,39	LEVEL II
Head of area	703,64	LEVEL II
Inspector responsible	679,31	LEVEL II
M&S Coordinator	401,40	LEVEL III
Draughtsman	328,29	LEVEL IV
Technician	309,18	LEVEL IV
Administrative	188,65	LEVEL V
Computer scientist	188,65	LEVEL V
Administrative assistant	162,71	LEVEL V
Watchman	122,50	LEVEL V

Remuneration audit process and results

The following information has been analysed as a basis for the full audit:

- Occupational classification followed in the company.
- Composition of the remuneration package.
- Job evaluation.
- Analysis of the wage register on the basis of positions of equal value.

In relation to the **basic salary**, it was observed that **none of the levels shows significant differences** (greater than 25%). In group I, we can observe a difference of close to 25% between the two people who occupied the position of General Management in the reference period. In this respect, it should be noted that the man

information has been complemented by the references for the application of the method by the ILO in its guide Promoting pay equity through gender-neutral job evaluation: A step-by-step guide (2008).

² Intervals and resulting levels:

Level 5	Level 4	Level 3	Level 2	Level 1
0 - 200	201 - 400	401 - 600	601 - 800	801 - 1000

had been with the company for 30 years, with a salary agreed with the previous owner. With the change of ownership, and the restructuring of the company, it was decided to appoint a new person to the General Management position, with a lower salary level for the post than the one contemplated in the previous period. As for level IV, the next level with the highest differences, although once again they do not reach 25% between the averages of one sex and the other, it should be explained that this is mainly due to the recruitment of junior technical staff through the internship contract modality, which initially presents a lower salary until their development in the company (starting with 60% of the basic salary, and increasing this percentage up to 100% in a period of a year and a half). During this period, 5 people, 4 women and 1 man, from the Geotechnical and Airports departments, were incorporated under this modality and conditions. In addition, the classification of technical staff grouped at this level on the basis of agreement levels should be reviewed in order to correct, if necessary, possible differences arising from this.

As regards the **voluntary improvement allowance**, there is a need for a definition of the criteria for determining this allowance. Thus, differences can be seen at all levels, some in favour of the female group and others in favour of the male group. This fact means that it cannot be concluded that the company is committing discrimination in the determination of salaries, but it can be determined that the lack of a common criterion or procedure that regulates the salary policy and, therefore, the allocation of these bonuses, is generating differences that must be analysed in detail and, if necessary, corrected, based on the comparison of posts of equal value.

With regard to **non-wage payments**, it should be noted that this figure refers to concepts associated with TI or contract indemnities, so the differences are not attributable to concepts associated with the worker's post or performance, but rather to the appearance of these circumstances and the compensatory nature of the same.

The **main findings of the wage audit are** as follows:

1. The company applies **collective agreement criteria for the classification of staff**. However, a review of this classification is considered necessary in order to

properly frame staff with the same functions in similar categories and levels, thus improving transparency and objectivity in terms of staff classification.

2. **In terms of wage policy, the company uses the criteria of the collective agreement as a starting point, establishing a supplement to improve the remuneration conditions of each post.** In this sense, it is detected that these improvements do not follow a standard criterion, and a greater definition of criteria and specific salary bands linked to the value or level of the posts is lacking, a fact that is causing significant differences in the different levels of posts of equal value analysed.

3. **Although significant wage differences between the sexes can be seen in the comparison of posts of equal value,** these occur fundamentally for the voluntary improvement supplement, in some cases in favour of the female group and in others in favour of the male group, and it cannot be concluded that the company is incurring in discrimination in the application of its wage policy. However, and as has already been pointed out, it can be determined that the lack of a standard that regulates this wage policy is generating differences that must be analysed in detail on the basis of a comparison of posts of equal value, and on that basis the relevant measures must be taken to correct them.

Following the analysis work carried out in this area, and in accordance with the reference regulations, which request the establishment of an **action plan** for the correction of pay inequalities, the following objective and its corresponding action measure is established (the planning, specification of resources, chronogram and monitoring indicators of which will be detailed in **section 6**).

OBJECTIVE	MEASURE
Standardise the criteria for setting salary bands for positions of equal value.	Define and homogenise the criteria that mark the remuneration policy when assigning a certain salary band, with special emphasis on the

	improvement allowance for each post or level of posts.
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Finally, it should be noted that **the remuneration audit will be valid for four years**, coinciding with the period established for the Equality Plan of which it forms part.

D. Working conditions.

Analysing the **working conditions**, most of the staff, 95.45% of the total, are employed full-time, while the remaining 4.55% are employed part-time (the latter group is made up of male staff).

It should be noted that 12.50% (11 people) of the full-time contracted staff took **reduced working hours during 2020**. In the case of men, 9.38% of male staff have requested a reduction in working hours, while in the case of women, this percentage rises to 20.83%. Of the total, 9 people have already requested to return to their normal working hours, while the remaining 2 people were still on reduced working hours at the end of the period. The most frequent reasons for requesting the reduction were legal guardianship, childcare and studies.

During the year 2020, **no overtime has been worked** in the company.

With regard to **absences and leave**, there are no major differences between the reasons for justified absences, with leave for serious illness or death of a relative up to the 2nd degree being the most requested by male and female staff. In this area, the company does not have a specific procedure for informing staff of the types of leave to which they are entitled. It is necessary to establish this communication, as well as to implement tools or means to facilitate the request for such leave and the corresponding holidays.

It is noted that the technical risk assessment report has been drafted taking into consideration that the tasks, working conditions, work equipment, chemical products, safety conditions and preventive measures also apply to women workers who carry out their activity in the workplace. In spite of this, **no occupational risk prevention measures specifically aimed at women could be ascertained**. Nor has it been possible to ascertain the existence of a procedure to be followed for the implementation of specific measures to deal with the risk of pregnancy, recent childbirth and breastfeeding.

In 2020, **there was no recruitment of staff seconded from other companies**.

In relation to the **functional and geographical mobility** regime, the company does not have any specific plan and/or procedure in this respect. In relation to functional mobility, it therefore adheres to the provisions of the Collective Bargaining Agreement for the sector of engineering companies and technical studies offices.

During the period under analysis, **there have been no substantial changes in conditions or non-applications of the collective bargaining agreement**.

E. Co-responsible exercise of the rights of personal, family and working life.

It should be noted that G.O.C. has a plan to improve the **reconciliation** of personal, family and working life, as well as measures to promote **co-responsibility**. These measures have to do with temporal and spatial flexibility, as well as the improvement of some of those established by law, such as the reduction of the working day to care for children and/or disabled people, birth, adoption and foster care leave, breastfeeding leave or leave of absence to care for children and/or disabled people.

F. Under-representation of women.

In 2020, the **workforce of** G.O.C. S.A. consists of a total of 88 workers, 72.73% of whom are men and 27.27% women. It can therefore be concluded that this is a **male-dominated workforce**. These data are in line with the situation of the sector or, more specifically, the occupation of engineering technicians. In this sense, the EPA (Labour Force Survey) indicates that, in 2020, the percentage of women in this occupation was 28.40% (the best figure of the year, in the 4th quarter). The best percentage, in the case of men, was reached in the first quarter of 2020 with 76.60%. This may, moreover, be perpetuated by the existing under-representation of women in Engineering and Architecture degree courses, as the percentage of female graduates in these subjects reached 26.90% in 2020. Despite this situation, the evolution of the female presence in G.O.C. from 2017 to date has been positive.

With regard to the distribution of staff by department, it should be noted that most departments are under-represented in terms of female staff (percentage of female staff below 60%), with the exception of the administration and finance department, which is under-represented in terms of male staff (percentage of male staff below 60%). Only the geotechnical and civil engineering departments are in a balanced situation. The company has 11 different job positions, of which the General Manager, the M&S Coordinator and the Administrative Manager are in balance, while the rest are under-represented among women. In other words, it can be concluded that there is **horizontal segregation**.

In addition, the distribution of the staff by position has been analysed according to the level of responsibility. In most cases they are male-dominated (commercial management director, area manager and inspector in charge), with the exception of the position of general manager, which is balanced. It is likely that this situation may be due to the low representation of women in the company in general, which reduces the likelihood of women moving up the ladder and reaching positions of responsibility. Nevertheless, this analysis leads to the conclusion that **vertical segregation does** exist.

G. Prevention of sexual and gender-based harassment.

Finally, it should be noted that the company does not have a protocol for dealing with **cases of sexual and gender-based harassment**. Similarly, no complaints have been registered for these reasons.

5. Objectives of the equality plan

General objectives

The **main objective of** the Equality Plan is to achieve equal treatment and opportunities, eliminating any possible discrimination based on sex within the company, and therefore integrating this gender perspective in a transversal manner in the company's management policies.

In pursuance of this main objective, this Equality Plan seeks to achieve, as far as possible, a balance in the following areas and the absence of discrimination, in line with the company's principles and policies:

- Ensure equal treatment and opportunities for women and men in access, selection, recruitment, promotion, training and other working conditions.
- Apply the gender perspective to all areas, policies and decisions of the company (guaranteeing the principle of gender mainstreaming).
- Promote and ensure compliance with the law on work of equal value, establishing mechanisms to ensure compliance with an equal pay policy.
- Promote the possibilities of access and promotion of women to positions of responsibility, implementing measures that aim to balance the workforce and redirect possible situations of inequality.
- To guarantee and improve working conditions and safety at work, ensuring the health and well-being of all staff.
- To facilitate the reconciliation of the personal, family and working lives of the people who make up the company's workforce, promoting joint responsibility.

- Encourage the implementation of measures aimed at collaborating in the construction of a society free of harassment of any kind or gender-based violence.

Priority areas for action and specific objectives

Taking into account all this context and after carrying out the diagnosis of the situation, the following **priority areas of action and specific objectives** are established **within the Equality Plan of the company GOC SA.**

On the one hand, a significant **under-representation of women has been** detected. Although this is explained by the characteristics of the sector, it is advisable to act jointly in all areas to try to reduce this imbalance in the representation of women in the company. Thus, one of the priorities is to promote the integration and balanced participation of women and men in all areas and levels of the organisation.

In order to achieve this general objective, it is essential to act in the area of **selection and recruitment**, through the development of policies and procedures that help the company to promote the recruitment of female talent, ensuring at all times processes that guarantee equal opportunities for both sexes in access to employment.

In support of the previous point, it is also considered interesting to act in terms of **training and promotion, with** a view to raising staff awareness of equality between women and men, and to encourage the development and promotion of staff within the company.

It is essential to develop specific **occupational risk prevention measures** for women, as well as to assess the specific risks during pregnancy, recent childbirth and breastfeeding. In addition, it is necessary to determine specific measures for the protection of these situations and to detail the procedure to be followed for their implementation.

Although the company has a protocol for action in the event of **sexual harassment or harassment based on sex**, it is advisable to take action in this area in terms of communication, awareness-raising and staff training on the subject.

In line with what has been said so far, the following general objectives can be established for each of the areas of action:

Selection and recruitment area

- Establish a recruitment and selection process that encourages the participation of women in selection processes and is geared towards attracting female talent.
- Encourage the incorporation of female staff in those departments, profiles or positions where they are under-represented.

Training and promotion area

- Raise awareness of equal opportunities between women and men throughout the organisation, especially among decision-makers in the area of recruitment and promotion.
- Improve the company's promotion system.

Occupational classification, remuneration and pay audits

- Improve the job classification procedure.
- Standardise the criteria for setting salary bands for positions of equal value.

Working conditions

- Improve communication and awareness of permits available to staff.
- Promote work-life balance and guarantee staff's digital rights and rest, by expressly recognising their right to digital disconnection and privacy at the end of their working day.

Prevention of occupational hazards

- Development of occupational risk prevention measures from a gender perspective.

Co-responsible exercise of rights in personal, family and working life

- Promote the reconciliation of the staff's personal and working lives through the co-responsible exercise of personal, family and working life rights.

Prevention of sexual and gender-based harassment

- Regulatory compliance with regard to the procedure for dealing with sexual harassment and harassment on grounds of sex.
- Raise staff awareness of sexual harassment and gender-based harassment.

Other subjects (cross-cutting objectives)

- Continuously promote the values of equal treatment and equal opportunities among the workforce.
- Ensure inclusive communication and non-sexist language in all company communications.
- Create a safe environment in the company for victims of gender-based violence.

6. Intervention measures

A. Selection and recruitment process.

Target	Establish a recruitment and selection process that encourages the participation of women in selection processes and is geared towards attracting female talent.
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Measure	A1. Include in job offers the company's commitment to equal opportunities between women and men.
Timeline for implementation	4th quarter 2021.

Responsible	HR Department.
Associated resources	Dedicated time for the inclusion of a paragraph to be included in job offers that communicates the company's commitment to equal opportunities between women and men.
Monitoring indicators	Message included in the job offers. Number of published job vacancies where the measure was applied. Copy of advertisements of published job offers.

Measure	A2. Always use neutral (non-sexist) language in the drafting and publication of job advertisements.
Timeline for implementation	4th quarter 2021.
Responsible	HR Department.
Associated resources	Time spent on the preparation of the job advertisement. Special attention should be paid to the use of non-sexist language.
Monitoring indicators	Copy of advertisements of published job offers. Number of published job vacancies where the measure was applied.

Measure	A3. Provide training in equal opportunities for the team responsible for selection processes.
Timeline for implementation	2nd quarter 2022.
Responsible	HR Department.
Associated resources	Search for training entities authorised to provide training on gender equality. Time within the working day devoted to training.

Monitoring indicators	<p>Documentation proving the completion of the training course (cost of training actions, number of trainings, content of the training, qualifications and/or associated recognitions, etc.).</p> <p>Number of people who received training.</p> <p>Number of hours of the training course(s).</p>
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Measure	A4. Communicate to new recruits the existence of an Equality Plan, the reasons for it and its objectives.
Timeline implementation for	4th quarter 2021.
Responsible	HR Department.
Associated resources	<p>Means to make this communication possible (paper communications, e-mail, company website, etc.).</p> <p>Time dedicated to the elaboration of the communiqué(s).</p>
Monitoring indicators	<p>Copy of the information document.</p> <p>Record of the communications made on all media used for these communications.</p> <p>Number of people who were informed of the existence of an Equality Plan, as well as the reasons for and objectives of the Plan.</p>

Target	Favour the incorporation of men or women in those departments, profiles or positions where they are under-represented.
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Measure	A5. Encourage the recruitment of women and men in positions in which they are under-represented, establishing as a positive action that, when two candidates are equally valued, the company will opt for the candidate of the under-represented sex.
Timeline implementation for	4th quarter 2021.
Responsible	HR department, applicant personnel department and management.

Associated resources	-
Monitoring indicators	<p>Records of studies conducted on the representation of men and women in the different departments.</p> <p>Number of processes in which the measure was applied.</p> <p>Number of men and women who have participated throughout the process and reasons for selection among the final candidates.</p>

Measure	A6. Monitor, during the life of the equality plan, the stability indicator for the recruitment of female staff (permanent hires or conversions of initially temporary hires of more junior staff).
Timeline for implementation	4th quarter 2022, 4th quarter 2023 and 4th quarter 2024.
Responsible	HR Department.
Associated resources	Time for review and follow-up of open-ended contracts or conversions to open-ended contracts.
Monitoring indicators	<p>Number of indefinite-term contracts carried out for female staff.</p> <p>Number of conversions to permanent contracts involving female staff.</p>

B. Training and career development.

Target	Raise awareness of equal opportunities between women and men throughout the organisation, especially among decision-makers in the area of recruitment and promotion.
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Measure	B1. Organise equal opportunities training for all staff.
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Timeline for implementation	1st quarter 2022.
Responsible	HR Department.
Associated resources	Search for training entities authorised to provide training on gender equality. Time within the working day devoted to training.
Monitoring indicators	Documentation proving the completion of the training course (cost of training actions, number of trainings, content of the training, qualifications and/or associated recognitions, etc.). Number of persons trained, disaggregated by gender. Number of hours of the training course(s).

Target	Improve the company's promotion system.
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Measure	B2. Develop and implement a system for objective performance evaluation, which is integrated with the career plan procedure.
Timeline for implementation	1st quarter 2022.
Responsible	HR Department.
Associated resources	Time spent on the development of the objective system for performance evaluation. Means and/or media for communication and training on the evaluation system to the persons responsible for the evaluation. Means and/or supports for recording the performance evaluations carried out.
Monitoring indicators	Documentation setting out the performance evaluation procedure (objectives, procedure, evaluation criteria, timing, etc.). Number of persons who have undergone performance appraisal. Records of performance evaluation results disaggregated by sex.

Measure	B3. Reinforce communication of internal vacancies to all staff, including information on requirements and how to apply if interested.
Timeline for implementation	1st quarter 2022.
Responsible	HR Department.
Associated resources	Means and/or media for the communication of internal vacancies. Time to produce communications on internal vacancies.
Monitoring indicators	Copy of the information document which must include: name of the vacancy, department, information about the requirements and ways to apply. This document must take into account the use of gender-neutral language. Record of the communications made on all media used for these communications. Number of persons who were informed of internal vacancies.

Measure	B4. Encourage the promotion of women and men in positions where they are under-represented, establishing as a positive action that, when two workers are equally valued, the company will opt for the promotion of the under-represented sex.
Timeline for implementation	4th quarter 2021.
Responsible	HR department and department in which the promotion takes place.
Associated resources	-
Monitoring indicators	Number of employees interested in the vacancy disaggregated by gender. Number of men and women promoted. Number of men and women who have participated throughout the promotion process and reasons for promotion among the final candidates.

C. Job classification, remuneration and pay audit.

Target	Improve the job classification procedure.
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Measure	C1. Study on an individual basis the suitability of each worker for the professional group in order to determine their correct assignment to it.
Timeline implementation for	3rd quarter 2022.
Responsible	HR Department.
Associated resources	Time dedicated to the individual study of the situation of each worker in relation to his or her professional classification. Means and/or media for recording these studies.
Monitoring indicators	Record of the individualised studies carried out, including the employee's current situation, motivation for the change, if any, as well as the new classification to which he/she will be assigned. Number of persons who have undergone an individualised study on their suitability for the professional group to which they are assigned.

Target	Standardise the criteria for setting salary bands for positions of equal value.
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Measure	C2. Define and homogenise the criteria that mark the remuneration policy when assigning a certain salary band, with special emphasis on the improvement allowance for each post or level of posts.
Timeline implementation for	4th quarter 2022.
Responsible	HR Department.

Associated resources	<p>Time devoted to the definition of criteria for remuneration policy, in order to assign a salary band or enhancement allowance to each post or level of posts, based on levels of posts of equal value.</p> <p>Seeking external consultancies if necessary.</p>
Monitoring indicators	Record on the regular monitoring of remuneration data and its evolution.

Measure	C3. Assess, from the plan monitoring committee, the need to update the remuneration audit, once the new regulations or technical guidelines have been published by the Ministry.
Timeline implementation	1st quarter 2022.
Responsible	HR Department.
Associated resources	<p>New regulation or technical guidance from the Ministry.</p> <p>Time spent on updating the remuneration audit, if assessed.</p> <p>Support from external consultants if necessary.</p>
Monitoring indicators	<p>Remuneration audit update (yes/no).</p> <p>Results of the remuneration audit update.</p>

D. Working conditions

Target	Improve communication and awareness of leave taken and available to staff.
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Measure	D1. Reinforce communication to staff of the leave available to them.
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Timeline for implementation	1st quarter 2023.
Responsible	HR Department.
Associated resources	Means and/or media to reinforce communication to staff of the permits available to them (through meetings, paper or digital media).
Monitoring indicators	Copy of the documents containing the information provided on the leave available to workers. Record of the communications made on all media used for these communications. Number of people who were informed about the permits available to them.

Measure	D2. Implement a tool or system for requesting and tracking leave and holidays.
Timeline for implementation	2nd quarter 2023.
Responsible	HR Department.
Associated resources	Search for tools, applications, etc., that make it easier for workers to request and monitor leave and/or holidays.
Monitoring indicators	Number of persons making use of the tool, application or system for tracking and requesting leave and holidays.

Target	Promote work-life balance and guarantee staff's digital rights and rest, by expressly recognising their right to digital disconnection and privacy at the end of their working day.
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Measure	D3. Formalise the teleworking procedure, negotiating and specifying its conditions with the RLT. The work will take as a reference the model revised during the work of drawing up the equality plan (in Annex V), with the conditions to be specified in the negotiation with the RLT.
Timeline implementation for	3rd quarter 2022.
Responsible	HR and LTR Department.
Associated resources	Negotiation of the telework protocol. Means for the dissemination and publication of the telework protocol.
Monitoring indicators	Minutes(s) of meeting(s) for the negotiation of the telework protocol (yes/no). Telework protocol (yes/no). Copy of the communiqué prepared for the dissemination and publication of the working protocol. List of means used for the dissemination and publication of the telework protocol.

Measure	D4. Conduct an assessment of the specific needs of the workforce in terms of digital disconnection, e.g. by using a staff survey to collect staff perceptions.
Timeline implementation for	1st quarter 2023.
Responsible	HR Department.
Associated resources	Development of a survey to assess the needs of the workforce in terms of digital disconnection. Survey support. Support from external consultancies on the basis of results if necessary.

Monitoring indicators	Survey to assess staff needs for digital disconnection (yes/no).
	Copy of the survey to assess the needs of the workforce in terms of digital disconnection.
	Results of the survey to assess the needs of the workforce in terms of digital disconnection.

Measure	D5. Following an appropriate needs assessment, draw up a digital disconnection protocol tailored to the company's reality.
Timeline for implementation	3rd quarter 2023.
Responsible	HR Department.
Associated resources	<p>Drawing up a digital disconnection protocol adapted to the reality of the company.</p> <p>Negotiation and formalisation of a digital disconnection protocol adjusted to the reality of the company.</p> <p>Support from external consultants if necessary.</p> <p>Means for dissemination and publication of the digital disconnection protocol.</p>
Monitoring indicators	<p>Existence of a protocol to ensure digital disconnection (yes/no).</p> <p>Copy of the communiqué prepared for the dissemination and publication of the digital disconnection protocol.</p> <p>List of media used for the dissemination and publication of the digital disconnection protocol.</p>

E. Prevention of occupational hazards

Target	Develop occupational risk prevention measures from a gender perspective.
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Measure	E1. Extend the procedure for action in the case of pregnant women, breastfeeding women and/or women who have recently given birth, identifying the positions in which special risk is detected, the measures to be applied, and the steps to be taken to implement the relevant protection measures.
Timeline for implementation	2nd quarter 2022.
Responsible	HR and General Services Department.
Associated resources	Search for entities authorised to assess occupational risks from a gender perspective and to draw up procedures for prevention and action in the case of pregnant women, breastfeeding women and/or women who have recently given birth.
Monitoring indicators	Documentation containing the results of the gender-sensitive risk assessment carried out, as well as the procedures for prevention and action in the case of pregnant women, breastfeeding and/or recent childbirth (Yes/No).

F. Co-responsible exercise of the rights of personal, family and working life.

Target	Promote the reconciliation of the staff's personal and working lives through the co-responsible exercise of personal, family and working life rights.
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Measure	F1. Reinforce communication to the workforce of work-life balance measures to encourage the co-responsible exercise of personal, family and working life rights.
Timeline for implementation	2nd quarter 2023.
Responsible	HR Department.
Associated resources	Means and/or media to reinforce communication to staff of the leave available to them (through meetings, paper or digital media).

Monitoring indicators	<p>Copy of the documents containing the information provided on the leave available to workers.</p> <p>Record of the communications made on all media used for these communications.</p> <p>Number of people who were informed about the permits available to them.</p>
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Measure	F2. Keep the identification of the needs or demands of the staff in terms of work-life balance up to date, according to the evolution of the same.
Timeline for implementation	3rd quarter 2023, 3rd quarter 2024 and 3rd quarter 2025.
Responsible	HR Department.
Associated resources	Time dedicated to the study of the needs or demands of the workforce in this area.
Monitoring indicators	Recording of changes and/or improvements in reconciliation.

G. Prevention of sexual and gender-based harassment

Target	Regulatory compliance with regard to the procedure for dealing with sexual harassment and harassment on grounds of sex.
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Measure	G1. Design and establishment of an action plan to deal with sexual and gender-based harassment.
Timeline for implementation	4th quarter 2021.
Responsible	HR Department.

Associated resources	<p>Services of an external consultant for the elaboration of the negotiated procedure within the Equality Commission within the I Equality Plan of the company.</p> <p>Creation of an e-mail account for the management of reports and complaints.</p>
Monitoring indicators	<p>Procedure for dealing with sexual harassment and harassment on grounds of gender (Yes/No).</p>

Measure	G2. Ensure the dissemination, knowledge and compliance by all staff of the procedure for dealing with sexual harassment and gender-based harassment.
Timeline for implementation	1st quarter 2022.
Responsible	HR and/or General Services Department.
Associated resources	Briefing and/or other means of communication.
Monitoring indicators	<p>Information disseminated about the procedure and means of communication used.</p> <p>Number of people who have been informed.</p>

Measure	G3. The Equality Committee monitors the number of cases of sexual and gender-based harassment in the company in order to establish corrective and/or preventive measures if necessary.
Timeline for implementation	1st quarter 2023, 1st quarter 2024 and 1st quarter 2025.
Responsible	HR Department.
Associated resources	<p>Time and support for the development of a tool to monitor cases of sexual harassment and gender-based harassment.</p> <p>Support for the dissemination of results to the equality commission.</p>

Monitoring indicators	<p>Tool for monitoring cases of sexual harassment and harassment based on sex (yes/no).</p> <p>Results obtained from the analysis of cases of sexual harassment and harassment based on sex.</p> <p>Dissemination of results to the equality committee (yes/no).</p>
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Target	Raise staff awareness of sexual harassment and gender-based harassment.
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Measure	G4. Implement training and awareness-raising actions through campaigns on sexual harassment and gender-based harassment for the entire workforce.
Timeline for implementation	2nd quarter 2022.
Responsible	HR and / or General Services Department.
Associated resources	<p>Time spent on conducting such training and/or awareness-raising campaigns on sexual harassment and gender-based harassment.</p> <p>Search for organisations that provide training on sexual harassment and gender-based harassment.</p>
Monitoring indicators	<p>Documentation proving the completion of the training course (cost of training actions, number of trainings, content of the training, qualifications and/or associated recognitions, etc.).</p> <p>Number of people who received training.</p> <p>Number of hours of the training course(s).</p>

H. Other subjects (cross-cutting objectives)

Target	Continuously promote the values of equal treatment and equal opportunities among the workforce.
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Measure	H1. Inform staff of the existence of an Equality Plan, the reasons for it and its objectives.
Timeline for implementation	4th quarter 2021.
Responsible	HR and/or General Services Department.
Associated resources	Staff briefing. Corporate website.
Monitoring indicators	Briefing (Yes/No). Publication of the Equality Plan on the company's website (Yes/No). Number of people who have been informed of the existence of the Equality Plan, reasons and objectives.

Target	Ensure inclusive communication and non-sexist language in all company communications.
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Measure	H2. To draw up a guide for the non-sexist use of language, reviewing its application in the company's current internal and external communication elements (website, publications, etc.).
Timeline for implementation	2nd quarter 2023.
Responsible	HR and/or General Services Department.
Associated resources	Study of the guides used in competing companies and other sectors. The support of an external consultant would be an asset.

Monitoring indicators	<p>Guidelines for non-sexist use of language (Yes/No).</p> <p>Copy of internal and/ or external company communications.</p> <p>Corrections made in the use of sexist language and images.</p>
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Target	Create a safe environment in the company for victims of gender-based violence.
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Measure	H3. Develop and implement a protocol for cases of victims of gender violence, including measures such as facilitating the geographical transfer of victims or allowing delays or absences from work justified by social workers.
Timeline implementation	for 1st quarter 2023.
Responsible	HR Department.
Associated resources	<p>Time and support for the development of a protocol for victims of gender-based violence.</p> <p>Means for the dissemination and publicity of the existence of a protocol for cases of victims of gender violence.</p>
Monitoring indicators	<p>Protocol for victims of gender-based violence (yes/no).</p> <p>Copy of the communiqué prepared for the dissemination and publication of the protocol for cases of victims of gender-based violence.</p> <p>List of media used for the dissemination and publication of the protocol for cases of victims of gender-based violence.</p>

I. Under-representation of women.

As indicated in the Objectives section of the Equality Plan, most of the objectives of the other areas of action, and therefore the associated measures, have the reduction of female under-representation as a cross-cutting objective. For this reason, no other specific measures are developed here, but special attention will be paid to the results and impact of measures in other areas, especially in the area of recruitment and hiring, and in other areas such as equality awareness and non-sexist language and communication.

7. Implementation and monitoring

The company designates as responsible for the organisation, monitoring and evaluation of the Plan:

Name:	Iván Cazapal Gómez
Position:	Head of General Services
Department:	General Services

Likewise, the members of the Negotiating Committee will become part of the **Monitoring Committee for the implementation of the Equality Plan**, with the following responsibilities:

- Promoting the implementation of the equality plan in the company.
- Verification of the degree of development of the measures, assessing results and establishing the appropriate modifications to them.

For these actions, the Commission will meet at least once a year in ordinary session, and when necessary, in extraordinary session at the request of one of the parties. They will carry out the necessary activities to monitor the development and implementation of the plan, drawing up a report with the main results and including possible corrective measures or strategies, in the event of detecting any areas for improvement. The

monitoring of each measure will be carried out in accordance with the monitoring sheet designed for this purpose (which can be consulted in Annex II).

8. Evaluation system

The same Monitoring Committee will be responsible for carrying out the **mid-term and final evaluations** and their corresponding reports, paying special attention to the evaluation of **the outcome, process and impact** of the measures.

The evaluation shall be carried out at the mid-term of the plan (2 years) and at the end of the plan (before the end of the 4 years).

The functions of the commission in this respect shall be:

- Evaluate the degree of compliance with the plan, checking whether it has achieved the proposed objectives.
- Assessment of the adequacy of the resources, methodologies, tools and strategies used in their implementation.
- Identification of areas for improvement or new needs that require the modification of adopted measures or the design of new actions.
- Preparation of annual monitoring, mid-term and final evaluation reports.

For monitoring and evaluation, the Commission will use the descriptive templates for each of the measures, the monitoring sheets covered, as well as a number of tools, including the following set of **benchmark indicators**:

a. Evaluation of results.

- Level of execution of the Plan. Total number of actions per area implemented in the company.
- Number and sex of beneficiaries by area.
- Number and gender of beneficiaries by category.
- Degree of development of the objectives set.

- Unintended effects of the Plan on the company.

b. Process evaluation.

- Degree of systematisation of procedures.
- Degree of information and dissemination among the workforce.
- Degree of adequacy of human resources.
- Degree of adequacy of material resources.
- Degree of adequacy of collection tools.
- Regular monitoring mechanisms put in place (list only as the individual fiches contain the details).
- Incidents and difficulties in the implementation of actions.
- Solutions provided with regard to incidents and difficulties in the implementation.

c. Impact assessment

- Reduction of inequalities between women and men in the workforce.
- Decrease in vertical segregation.
- Decrease in horizontal segregation.
- Changes in the behaviour, interaction and relationship of both staff and management in which greater equality between women and men is identified.
- Changes in the staff's assessment of equal opportunities.
- Changes in company culture.
- Changes in the company's image.
- Improvement of working conditions.
- Increased knowledge and awareness of equal opportunities.

In addition, **a series of specific indicators will be established for each of the measures set out in the equality plan, included in the fact sheets themselves.**

9. Review and revision.

This plan may be subject to revision during its term if so determined by the parties by mutual agreement and in compliance with the terms established in Art.9 of RD 901/2020.

All disputes arising from the application, monitoring, review or evaluation of this Equality Plan will be submitted, prior to judicial proceedings, to the relevant out-of-court conflict resolution mechanisms.

10. Calendar of events

NO.	INTERVENTION MEASURES	2021	2022				2023				2024				2025			
		4ºT	1ST T	2ND T	3RD T	4ºT	1ST T	2ND T	3RD T	4ºT	1ST T	2ND T	3RD T	4ºT	1ST T	2ND T	3RD T	4ºT
A1	Include in job offers the company's commitment to equal opportunities between women and men.																	
A2	Always use neutral (non-sexist) language in the drafting and publication of job advertisements.																	
A4	Communicate to new recruits the existence of an Equality Plan, the reasons for it and its objectives.																	
A5	Encourage the hiring of women and men in positions in which they are under-represented, establishing as a positive action that, when two candidates are equally valued, the company will opt for the candidate of the under-represented sex.																	
B4	Encourage the promotion of women and men in positions where they are under-represented, establishing as a positive action that, when two workers are equally valued, the company will opt for the promotion of the under-represented sex.																	

NO.	INTERVENTION MEASURES	2021	2022				2023				2024				2025			
		4ºT	1ST T	2ND T	3RD T	4ºT	1ST T	2ND T	3RD T	4ºT	1ST T	2ND T	3RD T	4ºT	1ST T	2ND T	3RD T	4ºT
G1	Design and establishment of an action plan to deal with sexual and gender-based harassment.																	
H1	Inform staff of the existence of an Equality Plan, the reasons for it and its objectives.																	
B1	Organise equal opportunities training for all staff.																	
B2	Develop and implement a system for objective performance evaluation, which is integrated with the career plan procedure.																	
B3	Reinforce the communication of internal vacancies to all staff, including information on requirements and how to apply if interested.																	
C3	Assess, from the plan monitoring committee, the need to update the remuneration audit, once the new regulations or technical guidelines have been published by the Ministry.																	
G2	Ensure the dissemination, knowledge and compliance by all staff of the procedure for dealing with sexual harassment and harassment on grounds of sex.																	

NO.	INTERVENTION MEASURES	2021	2022				2023				2024				2025			
		4ºT	1ST T	2ND T	3RD T	4ºT	1ST T	2ND T	3RD T	4ºT	1ST T	2ND T	3RD T	4ºT	1ST T	2ND T	3RD T	4ºT
A3	Provide training in equal opportunities for the team responsible for selection processes.																	
E1	Extend the procedure for action in the case of pregnant women, nursing mothers and/or women who have recently given birth, identifying the positions in which special risk is detected, the measures to be applied, and the steps to be taken to implement the relevant protective measures.																	
G3	Implement training and awareness-raising actions through campaigns on sexual harassment and gender-based harassment for the entire workforce.																	
C1	Study on an individual basis the suitability of each worker for the professional group in order to determine their correct assignment to it.																	
D3	Formalise the teleworking procedure, negotiating and specifying its conditions with the RLT. The work will take as a reference the model revised during the work on drawing up the equality plan (in Annex V), with the conditions to be specified in the negotiation with the RLT.																	

NO.	INTERVENTION MEASURES	2021	2022				2023				2024				2025			
		4ºT	1ST T	2ND T	3RD T	4ºT	1ST T	2ND T	3RD T	4ºT	1ST T	2ND T	3RD T	4ºT	1ST T	2ND T	3RD T	4ºT
A6	Monitor, during the life of the equality plan, the stability indicator for the recruitment of female staff (permanent hires or conversions of initially temporary hires of more junior staff).																	
C2	Define and homogenise the criteria that mark the remuneration policy when assigning a certain salary band, with special emphasis on the improvement allowance for each post or level of posts.																	
	Follow-up 1st year																	
D1	Strengthen communication to staff of the leave available to them.																	
D4	Conduct an assessment of the specific needs of the workforce in terms of digital disconnection, e.g. using a staff survey to collect staff perceptions.																	
G3	The Equality Committee should monitor the number of cases of sexual and gender-based harassment in the company in order to establish corrective and/or preventive measures if necessary.																	

NO.	INTERVENTION MEASURES	2021	2022				2023				2024				2025			
		4ºT	1ST T	2ND T	3RD T	4ºT	1ST T	2ND T	3RD T	4ºT	1ST T	2ND T	3RD T	4ºT	1ST T	2ND T	3RD T	4ºT
H3	Develop and implement a protocol for cases of victims of gender violence, including measures such as facilitating the geographical transfer of victims or allowing delays or absences from work justified by social workers.																	
D2	Implement a tool or system for requesting and tracking leave and holidays.																	
F1	Reinforce communication to the workforce of work-life balance measures to encourage the co-responsible exercise of personal, family and working life rights.																	
F2	Keeping the identification of the needs or demands of the staff in terms of work-life balance up to date, according to the evolution of the same.																	
H2	To draw up a guide for the non-sexist use of language, reviewing its application in the company's current internal and external communication elements (website, publications, etc.).																	
D5	After an appropriate needs assessment, draw up a digital disconnection protocol tailored to the company's reality.																	
	Monitoring 2nd year and evaluation of the plan																	

NO.	INTERVENTION MEASURES	2021	2022				2023				2024				2025			
		4ºT	1ST T	2ND T	3RD T	4ºT	1ST T	2ND T	3RD T	4ºT	1ST T	2ND T	3RD T	4ºT	1ST T	2ND T	3RD T	4ºT
	Follow-up 3rd year																	
	Follow-up 4th year and final evaluation																	

11. Annexes

ANNEX I: Protocol for the prevention of sexual and gender-based harassment.

1. COMMITMENT OF G.O.C. IN DEALING WITH SEXUAL HARASSMENT AND/OR GENDER-BASED HARASSMENT

With this protocol, G.O.C. declares its zero tolerance to the occurrence of conduct constituting sexual harassment and/or harassment on grounds of sex throughout its organisation.

By adopting this protocol, G.O.C. wishes to underline its commitment to the prevention of and action against sexual harassment and/or harassment based on moral gender in any of its manifestations, informing of its application to all personnel who provide services in its organisation, whether they are its own personnel or from other companies, including persons who, not having an employment relationship, provide services or collaborate with the organisation, such as trainees, those who carry out non-labour practices or those who volunteer.

G.O.C. also undertakes to inform the companies to which its own personnel are seconded, as well as the companies from which the personnel working at G.O.C. originate, of the existence of this protocol, indicating the need for strict compliance with it. Thus, the obligation to observe the provisions of this protocol shall be included in the contracts signed with other companies.

If the alleged harasser is outside the company's management and G.O.C. is therefore unable to implement the procedure in its entirety, it will contact the competent company in order for it to take the appropriate measures and, if necessary, sanction the person responsible, warning them that, if they fail to do so, the business relationship between the two companies may be terminated.

The protocol shall apply to situations of sexual harassment and/or harassment based on sex that occur at work, in connection with work or as a result of work:

- (a) in the workplace, including in public and private spaces when they are a workplace;
- (b) in places where the worker is paid, where he takes his rest or where he eats, or where he uses sanitary or washing facilities and changing rooms;
- (c) on work-related travel, trips, social or training events or activities;

- (d) in the context of work-related communications, including those made by means of information and communication technologies (virtual harassment or cyber-bullying);
- (e) in accommodation provided by the employer.
- (f) for journeys between home and place of work

This protocol complies with the requirements of articles 46.2 and 48 of Organic Law 3/2007, of 22 March, for the effective equality of women and men, RD 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 agreements and article 14 of Law 31/1995, of 8 November, on the prevention of occupational hazards.

Indeed, G.O.C., by committing itself to the measures that make up this protocol, expresses and publicises its express will to adopt a proactive attitude both in the prevention of harassment - raising awareness and providing information on behaviour not tolerated by the company - and in the dissemination of good practices and the implementation of any measures necessary to manage complaints and reports that may arise in this respect, as well as to resolve them as appropriate in each case.

(Vigo and date)

(SIGNATURE OF THE PERSON IN CHARGE OF THE COMPANY)

2. CHARACTERISTICS AND STAGES OF THE PROTOCOL FOR THE PREVENTION OF AND ACTION AGAINST SEXUAL HARASSMENT AND/OR HARASSMENT ON THE GROUNDS OF SEX

In order to comply with the commitment with which this protocol begins and in the terms set out so far, the company G.O.C. implements a procedure for prevention and action against sexual harassment and/or harassment based on sex, which has been negotiated and agreed by the negotiating committee of the equality plan, with the intention of establishing a mechanism that sets out how to act in a comprehensive and effective manner in the event of any behaviour that may constitute sexual harassment or harassment based on sex. To this end, this protocol combines three types of measures established in section 7 of the Annex to Royal Decree 901/2020 of 13 October:

1. Preventive measures, including a statement of principles, definition of sexual harassment and harassment based on sex and identification of conduct that could constitute these types of harassment.
2. Proactive or procedural measures to deal with harassment in order to deal with any complaints or reports that may arise and any applicable precautionary and/or corrective measures.
3. Identification of reactive measures against bullying and, where appropriate, the disciplinary regime.

2.1. PREVENTIVE PROTECTION AGAINST HARASSMENT

2.1.1. Declaration of principles

The company G.O.C. formalises the following declaration of principles in order to underline how relations between company personnel should be and what behaviour is not tolerable in the organisation.

This harassment protocol is applicable to any behaviour constituting sexual harassment and/or harassment on grounds of sex that may occur in G.O.C.

G.O.C., by implementing this procedure, assumes its commitment to prevent, not tolerate, combat and prosecute any manifestation of sexual harassment or harassment based on sex within its organisation.

Harassment is, by definition, a multi-fensive act that affects several legal interests, among which the dignity of the worker stands out as a positivisation of the right to life and to physical, mental and moral integrity. However, the affectation of dignity 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, health, etc., but even so, it will always by definition be contrary to dignity. Sexual harassment and harassment on grounds of sex always affect the dignity of the person who suffers it and constitutes discrimination.

Within G.O.C., conduct that may constitute sexual harassment and/or harassment based on sex in any of its manifestations will not be permitted or tolerated. The company will sanction both those who engage in offensive conduct and those who promote, encourage and/or tolerate it. All company personnel have the obligation to respect the fundamental rights of all those who make up G.O.C., as well as those who provide services to the company. In particular, they shall refrain from behaviour that is contrary to dignity, privacy and the principle of equality and non-discrimination, always promoting respectful conduct.

Notwithstanding the above, if they believe that they are being harassed or become aware of a situation of sexual harassment and/or harassment on grounds of sex, any employee may, by means of a complaint or report, activate this protocol as an internal, confidential and rapid procedure for the purpose of eradicating it and remedying its effects.

Once the corresponding informative file has been opened, if sexual harassment and/or harassment on grounds of sex is confirmed, G.O.C. will sanction whoever is appropriate, undertaking to use all its management and sanctioning powers to guarantee a working environment free of violence, sexist and discriminatory conduct on grounds of sex and in accordance with the principles of health and safety at work.

2.1.2. Concept and conduct constituting sexual harassment and harassment on grounds of sex

2.1.2.1. Definition of sexual harassment and conduct constituting sexual harassment

Definition of sexual harassment

Without prejudice to the provisions of the Penal Code, for the purposes of this protocol, any verbal or physical behaviour of a sexual nature which has the purpose or effect of violating the dignity of a person, in particular when it creates an intimidating, degrading or offensive environment, constitutes sexual harassment.

Any sexual harassment shall be deemed to be discriminatory.

The conditioning of a right or an expectation of a right on the acceptance of a situation constituting sexual harassment shall also be deemed to constitute discrimination on grounds of sex.

By way of example and without limitation, the following conduct could constitute sexual harassment:

Verbal behaviours:

-Allegations of sexual advances, propositions or pressure for sexual activity;

-Offensive flirtations;

-Insinuating comments, hints or obscene remarks;

-Unwanted phone calls or social media contacts.

-Jokes or comments about sexual appearance.

Non-verbal behaviours:

-Display of sexually suggestive or pornographic pictures, objects or writings, lewd looks, gestures.

Letters , e-mails or social media messages of an offensive nature and with a clear sexual content.

Physical Behaviours:

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

Quid pro quo" sexual harassment or sexual blackmail

Among the behaviours constituting sexual harassment, one can distinguish "quid pro quo" sexual harassment or sexual blackmail, which consists of forcing the victim to choose between submitting to sexual demands, or losing or being harmed by certain benefits or working conditions, affecting access to professional training, continued employment, promotion, remuneration or any other decision in relation to this matter. To the extent that it involves an abuse of authority, the harasser is a person who has the power, either directly or indirectly, to provide or withdraw a benefit or condition of employment.

Environmental sexual harassment

In this type of sexual harassment, the harasser creates an intimidating, hostile, degrading, humiliating or offensive environment for the victim, as a result of unwanted attitudes and behaviour of a sexual nature. It can be carried out by any member of the company, regardless of position or status, or by third parties located in any way in the work environment.

2.1.2.2. Definition and conduct constituting harassment on grounds of sex

Definition of harassment on grounds of sex

Harassment on grounds of sex is any conduct carried out on the basis of sex with the purpose or effect of violating the dignity of a person and of creating an intimidating, degrading or offensive environment.

Harassment on grounds of sex shall be deemed to be discriminatory.

In order to appreciate that a situation that can be classified as harassment on grounds of sex actually exists in a specific situation, a series of elements that form a common denominator must be present, among which the most important are the following:

- a) Harassment, understood as any intimidating, degrading, humiliating and offensive conduct that originates externally and is perceived as such by the person who suffers it.
- b) Objective attack on the victim's dignity and subjectively perceived by the victim as such.
- c) Pluriofensive result. The attack on the dignity of the person who suffers harassment on the grounds of sex does not prevent the concurrence of damage to other fundamental rights of the victim, such as the right not to suffer discrimination, an attack on the psychological and physical health, etc.
- d) That it is not an isolated event.
- e) The reason for these behaviours must be related to the fact that they are women or to circumstances that biologically can only affect them (pregnancy, maternity, breastfeeding); or that have to do with reproductive and care functions that, as a result of social discrimination, are presumed to be inherent to them. In this sense, harassment on grounds of sex can also be suffered by men when they carry out functions, tasks or activities related to the role that has historically been attributed to women, for example, a male worker who is harassed for caring for children or dependents.

The conditioning of a right or an expectation of a right on the acceptance of a situation constituting harassment on grounds of sex shall also be deemed to constitute discrimination on grounds of sex.

Conduct constituting harassment based on sex

By way of example, and without excluding or limiting, the following are a series of specific conducts which, fulfilling the requirements set out in the previous point, could constitute harassment on grounds of sex at work if they were to occur repeatedly.

Attacks with organisational measures

1. Judging the person's performance in an offensive way, hiding his or her efforts and abilities.
2. Questioning and disavowing the person's decisions.
3. Not assigning any homework, or assigning meaningless or demeaning homework.
4. Denying or concealing the means to carry out the work or providing incorrect information.
5. Assigning work that is much higher or much lower than the person's skills or qualifications, or that requires much lower qualifications than those possessed.
6. Contradictory or impossible to comply with orders.
7. Theft of belongings, documents, work tools, deletion of files from the computer, tampering with work tools causing damage, etc.
8. Threats or pressure on the persons who support the harassed person.
9. Manipulation, concealment, return of correspondence, calls, messages, etc., from the person.
10. Denial of or difficulties in accessing permits, courses, activities, etc.

Actions intended to isolate the target group

1. Change the location of the person by separating him/her from his/her peers (isolation).
2. Ignore the presence of the person.
3. Do not address the person.
4. Restrict colleagues from talking to the person.
5. Not allowing the person to express him/herself.
6. Avoid all eye contact.

7. Eliminate or restrict the means of communication available to the person (telephone, email, etc.).

Activities affecting the physical or mental health of the victim

Threats and physical aggression.

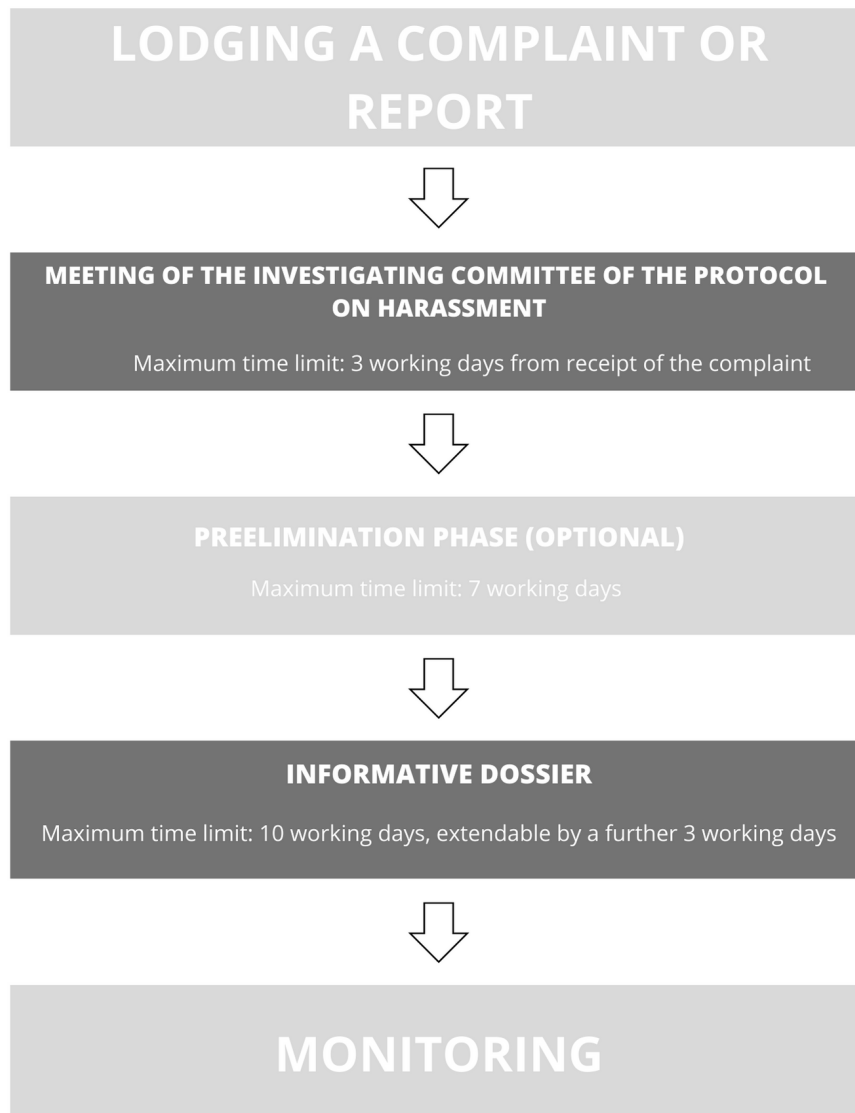
2. Verbal or written threats.
Shouting and/or insults.
4. Scary phone calls.
5. Provoke the person, forcing them to react emotionally.
6. Intentionally incurring expenses to the detriment of the person.
7. Damage to the workplace or to their belongings.
8. Requiring the person to perform work that is dangerous or harmful to his or her health.

Attacks on private life and personal or professional reputation

1. Manipulating personal or professional reputation through rumour, denigration and ridicule.
2. Imply that the person has psychological problems, try to get the person to undergo a psychiatric examination or diagnosis.
3. Teasing about gestures, voice, physical appearance, disabilities, name-calling, etc.
4. Criticism of nationality, political or religious attitudes and beliefs, private life etc.

2.2. ACTION PROCEDURE

Schematically, the phases and maximum deadlines for carrying out the action procedure are as follows:



2.3.1. Determination of the investigating committee for harassment cases

An investigating and monitoring committee for cases of sexual harassment and/or harassment on grounds of sex is set up and is made up of four people:

Rosa Costas Otero, as legal representative of the workers - administration.

Marta Loureiro Simón, as legal representative of the workers - building inspector.

Iván Cazapal Gómez, representing the company - responsible for General Services.

Jacobo Otero García, representing the company - commercial manager.

In the event of absence due to holidays, illness or any other legal reason, he/she may act as a substitute for any of the incumbent members:

Mateo Villaverde Sedano, representing the company - project technician.

In order to ensure the utmost confidentiality of this procedure, the persons who are members of this committee shall be permanent.

The commission will have a duration of four years. The aforementioned persons who make up this investigating commission shall comply exhaustively with impartiality with respect to the affected parties, and therefore in the event of any kind of kinship by blood or affinity with one or more of the persons affected by the investigation, intimate friendship, manifest enmity with the persons affected by the procedure or direct or indirect interest in the specific process, they shall abstain from acting. In the event that, despite the existence of these causes, abstention does not occur, any of the persons affected by the procedure may request the disqualification of said person or persons from the commission.

In addition, this committee, either by its own agreement or at the request of any of the persons concerned, may request the hiring of an external expert who may accompany them in the investigation of the procedure.

This committee shall meet no later than 3 working days from the date of receipt of a complaint, allegation or knowledge of inappropriate behaviour, in accordance with the procedure set out in this protocol for its presentation.

The committee shall immediately and thoroughly investigate any report, communication, complaint or report of behaviour that could be considered sexual harassment and/or gender-based harassment. Complaints, allegations and investigations shall be treated in the strictest confidence, consistent with the need to investigate and take corrective action, bearing in mind that it may directly affect the privacy and honour of individuals.

2.3.2. The start of the procedure: The complaint or denunciation

At G.O.C. Iván Cazpal Gómez, head of General Services, is the person in charge of managing and processing any complaint or denunciation that, in accordance with this protocol, may be filed by the people who provide services in this organisation.

G.O.C. employees should be aware that, barring malice or bad faith, they will not be penalised for activating the protocol. If they do so, any complaint will be presumed to be true and will be handled by the person referred to above.

Complaints will be secret, but cannot be anonymous, G.O.C. will guarantee the confidentiality of the parties concerned.

In order to guarantee the confidentiality of any complaint, denunciation or communication of a harassment situation, G.O.C. has set up the e-mail account prevencionacoso@gocsa.es to which only the person in charge of processing the complaint and the members of the investigating committee will have access, and whose sole and exclusive purpose is the presentation of this type of denunciation or complaint. This is without prejudice to the possibility of also accepting complaints or denunciations that may be submitted secretly, but not anonymously, in writing and in a sealed envelope addressed to the person in charge of handling the complaint. In order to protect the confidentiality of the procedure, the person in charge of handling the complaint shall give a code number to each of the parties concerned.

Upon receipt of a complaint in either of these two forms, the person in charge of handling the complaint shall immediately bring it to the attention of the company's management and the other members of the investigating committee.

The form included in this protocol is made available to the company's employees for the formalisation of the report or complaint. The presentation by the victim of the situation of sexual harassment and/or harassment on grounds of sex, or by any worker who has

knowledge of the same, of the corresponding form by e-mail at the address provided for this purpose or by internal register reporting a situation of harassment, will be necessary for the procedure to be initiated in the terms set out in the following section.

2.3.3. The preliminary phase or informal procedure

This phase is optional for the parties and will depend on the will expressed by the victim. The aim of this preliminary phase is to resolve the harassment situation urgently and effectively in order to achieve the interruption of the harassment situations and to reach a solution accepted by the parties.

Once the complaint or denunciation has been received, the investigating commission will interview the person affected, and may also interview the alleged aggressor or both parties, request the intervention of expert personnel, etc.

This informal procedure or preliminary phase shall have a maximum duration of seven working days from the receipt of the complaint or denunciation by the investigating committee. Within this period, the investigating committee shall conclude this preliminary phase, assessing the consistency of the complaint, indicating whether or not the purpose of the procedure has been achieved and, if appropriate, proposing the actions it deems appropriate, including the opening of the informative file. The entire procedure shall be urgent and confidential, protecting the dignity and privacy of the persons concerned. The file shall be confidential and only the aforementioned commission shall have access to it.

Notwithstanding the above, the investigating committee, given the complexity of the case, may skip this preliminary phase and proceed directly to the processing of the informative file, which it shall communicate to the parties. Likewise, the informative file shall be processed if the harassed person is not satisfied with the solution proposed by the investigating committee.

In the event of not proceeding to the informative file, the solution adopted at this preliminary stage shall be recorded and the company's management shall be informed.

Likewise, the workers' legal representatives, the person responsible for occupational risk prevention and the equality plan monitoring committee will be informed, who must keep

the information to which they have access confidential. In any case, in order to guarantee confidentiality, no personal data will be given and the numerical codes assigned to each of the parties involved in the file will be used.

2.3.4. The information dossier

If the preliminary phase is not activated or if the procedure cannot be resolved even though it has been activated, the informative file will be opened.

The investigating committee shall carry out an investigation³, in which it shall decide whether or not the harassment denounced has occurred after hearing the persons affected and witnesses proposed, holding meetings or requesting any necessary documentation, without prejudice to the provisions on the protection of personal data and confidential documentation.

Persons so requested shall cooperate as diligently as possible.

During the processing of the case, at the proposal of the investigating committee, the management of G.O.C. shall adopt the necessary precautionary measures leading to the immediate cessation of the situation of harassment, without such measures entailing permanent and definitive damage to the working conditions of the persons involved. Apart from other precautionary measures, the management of G.O.C. shall separate the alleged harasser from the victim.

In the course of the procedure, the victim shall be heard first and then the person against whom the complaint is lodged. Both parties involved may be assisted and accompanied by a person they trust, whether or not he/she is a legal and/or trade union representative of the workers, who shall maintain confidentiality regarding the information to which he/she has access.

The investigating committee may, if it deems appropriate, request external advice on harassment and equality and non-discrimination during the investigation of the

³ Xli\$ rziw\$ kexsr\$ wle\$ f\$ i\$ t\$ vsq tx\$ s\$ r\$ j\$ m\$ i\$ r\$ x\$ e\$ r\$ h\$ s\$ f\$ ewih\$ s\$ r\$ \$ x\$ l\$ i\$ t\$ v\$ r\$ g\$ r\$ t\$ p\$ w\$ s\$ j\$ s\$ r\$ x\$ e\$ h\$ m\$ x\$ s\$ r\$ e\$ r\$ h\$ s\$ v\$ e\$ m\$ d\$ 2\$ E\$ r\$)\$ s\$ s\$ q\$ t\$ i\$ e\$ m\$ r\$ x\$ s\$ e\$ p\$ i\$ k\$ e\$ x\$ s\$ r\$ s\$ v\$ e\$ r\$ e\$ m\$ s\$ e\$ w\$ i\$ h\$ w\$ l\$ e\$ f\$ i\$ t\$ v\$ i\$ w\$ y\$ q\$ i\$ h\$ s\$ f\$ i\$ s\$ y\$ i\$ z\$

procedure. This external expert is obliged to guarantee the utmost confidentiality with regard to everything that he/she may have knowledge of or access to as a member of the conflict resolution committee in question, and shall be bound by the same grounds for abstention and disqualification as the members of the investigating committee.

At the end of the investigation, the committee shall draw up a report stating the facts, the testimonies, the evidence given and/or collected, concluding whether or not, in its opinion, there are indications of sexual harassment and/or harassment on grounds of sex.

If from the evidence gathered it can be deduced that there is evidence of harassment, in the conclusions of the report, the investigating committee will urge the company to adopt the appropriate sanctioning measures, and may even, in the case of very serious harassment, propose the disciplinary dismissal of the aggressor.

If the evidence does not reveal any signs of harassment, the committee shall state in the minutes that the evidence expressly given does not indicate the existence of sexual harassment and/or harassment on grounds of sex.

If, even if there is no harassment, an inappropriate action or a situation of violence susceptible of being sanctioned is found, the harassment investigating committee shall also urge the management of G.O.C. to take the measures it deems appropriate in this respect.

Within the harassment investigation committee, decisions shall be taken by consensus whenever possible and, failing that, by majority vote.

The procedure shall be swift, efficient, and the privacy, confidentiality and dignity of the persons concerned shall be protected in all cases. Throughout the entire procedure, strict confidentiality shall be maintained and all internal investigations shall be carried out with tact and due respect, both for the complainant and/or the victim, who shall in no case be treated unfavourably for this reason, and for the accused, whose proof of guilt requires the concurrence of evidence in the terms provided for in the labour regulations in the case of violation of fundamental rights.

All persons involved in the process are obliged to act in strict confidentiality and to maintain secrecy and professional secrecy with regard to all information to which they have access.

This phase of formal development shall be carried out within a period of no more than ten working days. If there are reasons which, due to their complexity, require a longer period, the investigating committee may agree to extend this period, but in no case by more than a further three working days.

2.3.5. The resolution of the harassment case

The management of G.O.C., once it has received the conclusions of the investigating committee, shall take the decisions it deems appropriate within 3 working days, and shall be the only body empowered to decide on the matter. The decision taken shall be communicated in writing to the victim, the person denounced and the investigating committee, who shall maintain confidentiality regarding the information to which they have access.

Likewise, the decision finally adopted in the case will also be communicated to the equality plan monitoring committee and to the person responsible for occupational risk prevention. In these communications, in order to guarantee confidentiality, no personal details will be given and the numerical codes assigned to each of the parties involved in the case will be used.

Based on these previous results, G.O.C. management will proceed to:

- e- file the proceedings in the archives and draw up a report on the matter.
- f- adopt whatever measures it deems appropriate in accordance with the suggestions made by the committee investigating the harassment procedure. By way of example, the following decisions may be taken by the company in this regard:
 - a) physically separating the alleged aggressor from the victim, by means of a change of position and/or shift or timetable. In no case shall the victim of harassment be forced to change position, working hours or location within the company.
 - b) without prejudice to the provisions of the previous point, if appropriate, and depending on the results of the investigation, the aggressor will be sanctioned

by applying the table of offences and penalties provided for in the collective agreement applicable to the company or, where appropriate, in Article 54 ET.

Among the sanctions to be considered for application to the aggressor, the following will be taken into account:

- s2 transfer, displacement, change of post, working day or location
- 62 suspension from employment and pay
- 72 the time limitation for promotion
- s2 disciplinary dismissal

In the event that the sanction against the aggressor is not the termination of the contractual relationship, the management of G.O.C. will maintain an active duty of vigilance towards the worker when he/she returns to work (in the case of a suspension), or in his/her new position in the case of a change of location. But always and in any case, compliance with eradicating harassment will not end with the mere adoption of the measure of the change of post or with the mere suspension, being necessary its subsequent monitoring and control by the company.

The management of G.O.C. shall take the necessary preventive measures to avoid a recurrence of the situation, reinforce training and awareness-raising actions and carry out actions to protect the health and safety of the victim, including, among others, the following:

- Assessment of psychosocial risks in the company.
- Adoption of surveillance measures to protect the victim.
- Adoption of measures to avoid recidivism of sanctioned persons.
- Psychological and social support for the person being harassed.
- Modification of working conditions that, with the consent of the person who has been harassed, are deemed beneficial to his or her recovery.
- Training or retraining for the professional updating of the harassed person when he/she has been on IT for a prolonged period of time.
- Carrying out new training and awareness-raising actions for the prevention, detection and action in the face of sexual harassment and/or harassment based on sex, aimed at all persons providing their services in the company.

2.3.6. Follow-up

Once the file has been closed, and within a period of no more than thirty calendar days, the investigating committee shall be obliged to monitor the agreements adopted, that is to say, their compliance and/or the result of the measures adopted. The result of this monitoring shall be recorded in the appropriate minutes, which shall include the measures to be adopted in the event that the events causing the procedure continue to occur and shall also analyse whether the proposed preventive and sanctioning measures have been implemented. The report will be sent to the company's management, to the legal and/or trade union representatives of the workers, to the person responsible for occupational risk prevention and to the equality plan monitoring committee, with the precautions indicated in the procedure regarding the confidentiality of the personal data of the parties concerned.

3. DURATION, ENFORCEABILITY AND ENTRY INTO FORCE

The content of this protocol is mandatory, coming into force on the date set out in the G.O.C. equality plan, 18.11.2021 or, failing that, from the date it is communicated to the company's staff via the company's Intranet and e-mail, and will remain in force for 4 years.

Likewise, the protocol will be reviewed in the cases and deadlines determined in the equality plan in which it is integrated.

The present procedure does not preclude the right of the victim to report, at any time, to the Labour and Social Security Inspectorate, as well as to the civil, labour or criminal courts.

4. MODEL COMPLAINT OR DENUNCIATION IN THE COMPANY

- I. Person reporting the facts
- Person who has suffered harassment

Other (please specify):

II. Details of the person who has been harassed

Name:

Surname:

DNI:

Position:

Type of contract/employment relationship:

Telephone:

Email:

Address for notifications: III.

Details of the aggressor

Name and surname:

Professional group/category or position:

Work centre:

Name of the company:

IV. Description of the facts

(Include an account of the events reported, attaching as many numbered sheets as necessary, including dates on which the events took place where possible).

V. Witnesses and/or evidence

If there are witnesses, please indicate name and surname:

Attach any means of proof you consider appropriate (please indicate which):

VI. Application

The complaint or report of harassment (INDICATE WHETHER SEXUAL OR SEX-BASED) against (IDENTIFY AGGRESSOR) is considered to have been filed and the procedure set out in the protocol is initiated:

Location and date:

Signature of the person concerned:

For the attention of the Commission for the Investigation of the complaint procedure against sexual harassment or harassment on grounds of sex in the company G.O.C.

ANNEX II: Measures monitoring sheet.

Measure	(Specify)				
Person/Department responsible					
Date of implementation					
Follow-up date					
Related objective					
Degree to which the objective has been met	<input type="checkbox"/> None	<input type="checkbox"/> Under	<input type="checkbox"/> Medium	<input type="checkbox"/> High	<input type="checkbox"/> Total

	(0%)	(25%)	(50%)	(75%)	(100%)
Monitoring indicators					
Transfer all indicators included in the action sheet (and the result for each of them).					
No. of participants					
Performance indicators					
Level of implementation	<input type="checkbox"/> Slope	<input type="checkbox"/> In progress		<input type="checkbox"/> Completed	
Indicate the reason why the measure has not been started or fully completed.	Lack of human resources			<input type="checkbox"/>	
	Lack of material resources			<input type="checkbox"/>	
	Lack of time			<input type="checkbox"/>	
	Lack of participation			<input type="checkbox"/>	
	Lack of coordination with other departments			<input type="checkbox"/>	
	Ignorance of development			<input type="checkbox"/>	
	Other reasons (please specify)			<input type="checkbox"/>	
Process indicators					
Difficulties and barriers encountered in implementation					
Solutions adopted (if any)					
Impact indicators					
Improvements made					
Proposals for the future					
Supporting documentation for the execution of the measure					
Has the measure helped to meet the objective?					