

Discrimination and Harassment Prevention Policy

Approved by the Board of Directors on 22.10.2021

Background

In line with the values and commitments assumed in the Code of Ethics and Conduct, Galp accepts the duty to provide a safe environment for all its employees, free of any form of harassment, and promotes a work environment which prioritises dignity, respect and inclusion.

To do so, it adopts a zero tolerance policy against any form of harassment, and treats all incidents of this nature with seriousness, respect and trust, promptly investigating all allegations, and taking the appropriate measures to restore the integrity of the victim and punish the perpetrator of the harassment.

Commitments

In line with its intransigence in the fight against harassment, Galp undertakes to:

- Promote a culture of reciprocal respect, by not tolerating and by seeking to prevent, either at the time of access to an employment opportunity, at the workplace or professional training, conduct that aims to disturb, embarrass or affect personal dignity, or create an environment that is intimidating, hostile, degrading, humiliating or destabilising;
- Develop awareness and training initiatives for preventing and reacting to harassment, in order to reinforce a culture of integrity and respect;
- Conduct periodic investigations to identify harassment situations and develop measures for identified risks;
- Promote a work environment in which each person can trust and partner with the other in detecting and communicating these practices that are not tolerated;
- Provide or inform about the channels available to report situations where harassment is known or reasonably suspected;
- Guarantee assistance to any affected employee.

What is Harassment?

Harassment is characterised by any inappropriate and offensive behaviour directed at a person, where the perpetrator has a duty to perceive that such behaviour would be perceived as offensive by the victim in that context.

Any censurable or unacceptable conduct that demeans, belittles or causes humiliation or personal embarrassment to an individual is considered harassment.

Harassment in General

Harassment can take many different forms and can include, but is not limited to:

- Degrading expressions used by a hierarchical superior or colleague;
- Unjustified and unnecessary continuous comments, or deliberate insults associated with the professional competence of an employee;
- Threatening, abusive or insulting comments, whether oral or written;
- Deliberate desecration of religious and/or national symbols;
- Unfounded and malicious complaints of misconduct against other employees;
- To imitate, make fun of or belittle an employee's behaviour;
- Continuous interference in a person's workspace, work materials, equipment, etc.;
- Display of photos, electronic images or written materials of an obscene or questionable nature, aimed at a particular employee,
- Continuous exclusion of an employee or group from normal communication in a work environment or social activities;
- Deliberate intrusion into a person's private life;

Sexual harassment

Sexual harassment is a particular form of harassment that includes unwanted sexual activities, requests for sexual favour or unwanted verbal or physical conduct of a sexual nature that objectively creates an intimidating, hostile or offensive environment for the victim. Sexual harassment may occur regardless of whether or not the harasser considers the behaviour to be offensive, and the perpetrator or victim may be of any gender or sexual orientation.

Examples of behaviours that constitute sexual harassment:

- the repetition of suggestive comments or insinuations;
- the display of sexually oriented material in the workplace;
- the use of rude or obscene language or gestures, including jokes or obscene stories;
- repeated and/or exaggerated praise or comments about an employee's physical appearance or characteristics;
- deliberate and unsolicited physical contact or unnecessarily close physical proximity;
- direct proposals of a sexual nature;
- any association between proposals for sexual activities and improvement of employment conditions, promotion, professional development, etc.;
- letters, telephone calls, emails or other unwanted and inappropriate communications of a sexual nature.

Discrimination as a Method of Harassment

Discrimination is a form of harassment consisting of acts or omissions aimed to demeaning a person or group of people on grounds such as race, nationality, creed, religion, nationality, sex, sexual orientation, gender identity, age, mental or physical ability or political identity. Discriminatory harassment may take the form of disdainful treatment or stereotyped expressions about a group to which the victim may belong.

Unjustified Benefit as a Means of Harassment

An unjustified benefit is a type of discriminatory behaviour that consists of granting a certain person certain advantages or privileges to the detriment of the victim, with the purpose of causing the victim emotional and psychological distress, progressive degradation and damage to self-esteem.

Such benefits can take several forms, such as:

- Unjustified flexibility of working hours only for certain employees;
- Awarding of remuneration advantages or awards without objectively justifiable grounds;
- Constant praise directed to certain employee(s), constantly excluding other employees without objectively justifiable grounds;
- Better social treatment directed at certain employee(s) to the detriment of other(s) in the work environment;

How to Handle Harassment?

- The informal approach:

Employees who believe they are subject to harassment must first try to make it clear to the perpetrator of the harassment that the behaviour is unwanted, offensive and must cease immediately. To this end, they can get the help of another team member, their hierarchical superior (if this is not the perpetrator of the harassment) or the person in charge of the People Team for the area in which the employees are allocated.

- The formal approach:

If the informal approach has not produced the desired effects, or the victim does not feel comfortable taking that approach for fear of retaliation, please use the "Opentalk" channel, and report this situation to the Ethics and Conduct Committee.

What is each of our roles?

The role of managers

If any employee with leadership roles becomes aware of conduct, or an allegation of conduct, involving potential acts of harassment, they must act expeditiously, seriously, confidentially and fairly, regardless of whether or not formal or written communication has been made to the Ethics and Conduct Committee.

The manager has a duty to:

1. Take all allegations of harassment seriously regardless of the extent or origin of the reported conduct;
2. Ensure that any form of harassment or improper conduct is immediately reported to the Ethics and Conduct Committee;
3. Take appropriate measures to prevent continuation of conduct or the practice of acts of retaliation during and after an investigation.

Any manager who allows or tolerates any form of harassment or retaliation, or who fails to immediately report such conduct to the Ethics and Conduct Committee will be in breach of this policy.

The role of employees

All employees have a responsibility to help create and maintain a work environment where dignity, respect and inclusion prevail, and intimidation and harassment are not permitted or tolerated. To do so, each employee must:

1. Be aware of how their own behaviour may affect others and change it if necessary.
2. Treat their colleagues with dignity and respect.
3. Take an effective position if they believe that inappropriate jokes, comments or behaviour are being directed to other employees.
4. Make it publicly clear that the behaviour of the perpetrator of the harassment is unacceptable.
5. Intervene, if possible, to prevent the continued occurrence of the harassment or intimidation.
6. Promptly report to their manager or the Ethics and Conduct Committee any incident involving intimidation or harassment they witness.

Retaliation

Galp does not allow any retaliation by the perpetrator of the harassment against the victim.

If an employee is the victim of a retaliatory act, he/she must contact the Ethics and Conduct Committee so that it can instigate the procedures to guarantee the victim is protected and the retaliator is reprimanded/punished.

Consequences

Galp will adopt effective measures to punish acts of harassment, initiating the competent disciplinary proceedings and applying effective disciplinary sanctions, which may involve, among others, dismissal of the perpetrator of the harassment on reasonable grounds.

Additionally, Galp may consider pursuing legal measures to preserve or restore its or the victim's rights.