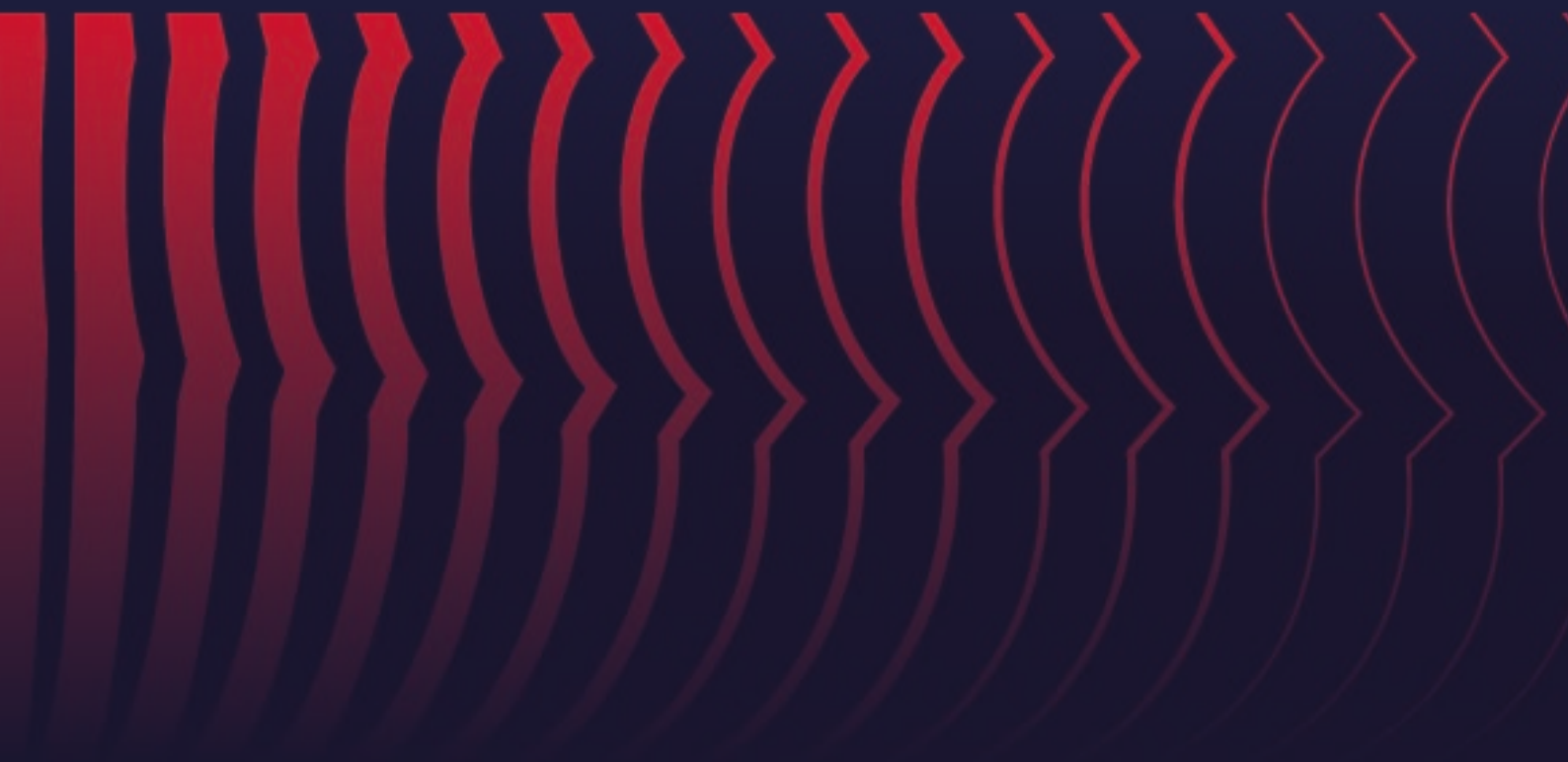




FC BARCELONA

Protocol for Preventing and Addressing Workplace Harassment

**VERSION 02
OCTOBER 2023**





IMPORTANT INFORMATION ABOUT THIS DOCUMENT	
Identification of the document	Protocol for Preventing and Addressing Workplace Harassment
Territorial scope of the Compliance Management System	Global
Rules it governs	Compliance Policy Code of Ethics
Rules it replaces/changes	Protocol for the prevention, detection and resolution of sexual, gender-based or workplace harassment
Related rules	Other documents that make up the <i>Compliance Management System</i> of FC BARCELONA
Business unit or function it affects	All units and functions of FC BARCELONA and related entities
Staff it affects	All <i>Members</i> of FC BARCELONA and related entities, Business Partners
Employee responsible for its monitoring	<i>Compliance Department</i>
Date of approval	October 2023



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1. Commitment by FC Barcelona

In line with the ethical values of FC Barcelona, the Club hereby expresses its commitment to not tolerate workplace harassment under any circumstances. It will support any and all potential victims. In addition, the Club will act in accordance with the laws in force at all times.

In accordance with the foregoing, the objective of this Protocol is to demonstrate FC Barcelona's stance of zero tolerance of any type of behaviour that could constitute workplace harassment.

In this sense, this Protocol is the Club's main instrument to effectively protect its workers' fundamental rights and enforce its obligation to protect their health and safety by preventing, detecting and resolving workplace harassment. This is how it fulfils its obligations to protect its staff, as stipulated in current labour and occupational risk regulations.

FC Barcelona is committed to promoting a respectful working environment that at all times respects the right to equal treatment, non-discrimination, dignity, privacy and integrity.

2. Goal

This Protocol aims to prevent cases of workplace harassment and to ensure a proper remedy for victims when harassment occurs.

Its specific goals are to:

- a) Develop prevention strategies to eradicate these behaviours and better detect them when they occur.
- b) Define the roles and responsibilities of all parties involved in this protocol.
- c) Guarantee the rights of the victim, the whistleblower, the reported perpetrator and the witnesses affected by this protocol, particularly as regards the confidentiality of their personal data.
- d) Provide comprehensive protection for the victim, including by adopting precautionary measures, when necessary.
- e) End harassment, establish measures to remedy the situation, help victims recover and, if necessary, promote the implementation of appropriate disciplinary action.

Notwithstanding the application of this protocol, any person can freely take the legal action they deem appropriate.



3. Scope of Application

In order for this Protocol to apply, the following scopes must occur simultaneously:

3.1. Objective Scope

This protocol applies to situations constituting workplace harassment, as per the definitions below:

- **Workplace harassment** is any conduct, practice or behaviour, within a working relationship, that represents a systematic and recurring attempt to strip a worker of their dignity, both directly or indirectly, through emotional and psychological violence and/or hostility.

The goal of workplace harassment is usually to limit the victim's capabilities, advancement or permanence, thus negatively affecting the work environment.

We must be careful not to confuse professional pressure or conflict with workplace harassment. Professional pressure and conflict are disagreements within the workplace that can occur through clashes, arguments or possible conflicts. Workplace harassment, however, is a malicious, intense, systematic and long-term attack on a person. This means that situations that cannot be considered workplace harassment and are mere interpersonal conflicts fall outside of this Protocol's scope of application, regardless as to whether or not they are included in the scope of application of FC Barcelona's psychosocial risk prevention policy.

- **Discriminatory harassment:** Discriminatory harassment is workplace harassment based on race, ethnicity, religion, beliefs or other personal or social circumstances, the purpose or result of which is to nullify or limit the equal recognition, enjoyment or exercise of the victim's human rights and fundamental freedoms, to cause them general harm or to make it difficult for them to integrate into the workplace.

The examples used and the types of harassment defined in the protocol are tools and guides to help people interpret and apply it. They should never be regarded as closed or exclusive definitions, which could leave victims of harassment unprotected.

Harassment takes different forms, depending on the hierarchy of the interactions between the harasser and victim and the organisational levels in question. It is a form of violence that the perpetrator exercises through a perception of power over the victim, which can occur in any area of an interpersonal relationship. Hierarchical superiority may or may not be involved.

Harassment of any type could create an environment that intimidates, humiliates, degrades or is unfavourable and offensive to those suffering it. Harassment is usually intentional, systematic and repeated. Nonetheless, even negligent harassment that occurs as a one-off or limited occurrence can have a serious impact on the victim and cannot be excluded.



The first consequences for the victim are psychological pressure, decreased performance, absenteeism or limited professional advancement or improvement. These consequences often end with the victim voluntarily quitting their job, and have profound psychological effects.

Regarding the effects of harassment on people other than the victim, second-order violence is recognised as behaviours intended to retaliate or attack the people who support or stand with the victim.

Behaviours constituting harassment based on gender, sexual orientation, gender identity or gender expression are expressly and independently regulated in the *Protocol for preventing and addressing sexual harassment based on gender, sexual orientation, gender identity or gender expression*. In this sense, in cases where signs are identified of behaviours which could also be classified as workplace harassment, the Protocol stated above will take preference.

3.2. Physical Scope

This protocol applies to harassment that occurs in the physical workplace or any other space where the situation is related to or is the result of work. In accordance with Article 3 of ILO Convention 190, this includes situations that occur:

- a) in the workplace, including public and private spaces where these are a place of work.
- b) in places where the worker is paid, takes a rest break or a meal, or uses sanitary, washing and changing facilities.
- c) during work-related trips, travel, training, events or social activities.
- d) through work-related communications, including those enabled by information and communication technologies.
- e) in employer-provided accommodation.
- f) when commuting to and from work.

3.3. Subjective Scope

This protocol applies when the perpetrator or the victim of harassment is a member of the Entity.

The fundamental value of FC Barcelona is the comprehensive protection of children, their well-being, and their free development. In this sense, the Response Protocol forming part of the FC Barcelona Child Protection System is applicable in any situation of harassment involving minors.



Any person linked with FC Barcelona will be subject to this protocol, including but not limited to:

- Individuals with the authority, tasks or responsibilities of an employee, executive staff or member of the Board of Directors.
- Workers employed or linked by a contract of any type, including irregular or dismissed workers and including sports staff.
- Workers of contractors, subcontractors, and temporary employment companies.
- Volunteers, interns, trainees, applicants and job seekers.

4. Principles of Action

The following principles govern and must be respected by anyone who participates in applying this protocol and addressing a situation of harassment:

- **Confidentiality and privacy**

The identity and personal data of the whistleblower and anyone else mentioned in relation to the reported or investigated facts must remain confidential, along with all of the actions carried out. Measures must be taken to prevent unauthorised access to the content of these actions.

No health data related to the victim will be recorded in the procedure, unless the victim gives their free consent and the information is useful for the purposes that guide this protocol.

- **Indemnity and prohibition of reprisals**

The victim, whistleblower and witnesses must not suffer any type of reprisals for their actions. Appropriate precautionary measures must be taken to protect them and guarantee their absolute indemnity, and actions must be adopted to comprehensively protect the victim and aid in their recovery.

- **Impartiality**

All individuals and bodies responsible for applying this protocol must act with absolute impartiality with respect to the facts, without any kind of conflict of interests. They must act free of any pressure that would alter the purposes and objectives of this protocol or render its actions ineffective. Factors that are both favourable and unfavourable for the parties involved must be taken into account when determining the facts.

- **Presumption of innocence**

The person accused of harassment has the right to be presumed innocent until proven otherwise by investigating the facts and/or establishing disciplinary or legal responsibilities. To this end, they must never be treated as guilty or responsible for the facts until such responsibility is confirmed through this protocol or other applicable regulations.



- **Speedy procedure and due diligence**

Both the victim and the person accused of harassment have the right for the response protocol to be conducted and concluded in a speedy manner. This applies to the formalities established and to the rights and guarantees of all the parties. There may be no unjustified stoppages in the procedure.

5. Prevention Measures

5.1. Corporate Commitment

With the aim of promoting a zero tolerance environment for workplace harassment, FC Barcelona must allocate the necessary resources to enact this protocol and adapt existing resources and tools to this text.

In this sense, FC Barcelona is committed to, among others:

- Distributing the Code of Ethics and other FC Barcelona internal regulations, including this Protocol.
- Promoting the respect and consideration of this protocol among all FC Barcelona members and carrying out any action deemed necessary to fulfil its purposes.
- Identifying and assessing risks, as necessary, in the field of occupational risk prevention, taking into account the possible psychosocial risks observable within the scope of the Club.
- Taking measures that promote the mental health of FC Barcelona Members.
- Using the disciplinary measures provided for in applicable labour law, where necessary and relevant.
- Carrying out other necessary measures, according to the specific circumstances, to ensure compliance with labour regulations and requirements.

5.2. Distribution of the Protocol

To be an effective tool for eradicating harassment, Members of the Entity must be aware of the existence of the protocol and understand its content.

FC Barcelona must develop a communication plan to distribute the protocol, which must include at least the following measures:

- Inform new hires of the existence of this protocol (*onboarding*).
- Develop and disseminate protocol information through appropriate internal means, such as the intranet (*Basilea*).
- Publish this protocol on the website.



5.3. Training and Awareness

FC Barcelona must include compulsory sessions on this matter in the training plan for Members of the Entity, adapted to its different groups.

In addition to the regular training included in the annual training plan, FC Barcelona must include basic harassment prevention training through e-learning modules within the onboarding process of new hires.

FC Barcelona must also produce campaigns to raise awareness among Members of the Entity of the organisation's zero tolerance policy towards workplace harassment.

5.4. Prevention Measures for Business Partners

FC Barcelona must ask its Business Partners to contractually confirm that they have their own policies and protocols that are sufficient for preventing and addressing harassment. This must stipulate that any breach relating thereto may result in the termination of their contractual or business relationships.

6. Detection Measures

FC Barcelona must take measures to detect harassment situations that may occur within the Entity and subsequently resolve them.

Thus, in addition to developing detection instruments within the framework of the training and awareness policies detailed in Section 5.3, FC Barcelona must carry out the following actions:

- Conduct work climate studies and other studies to understand how frequently these types of behaviours occur in the organisation.
- Respond to any reports of workplace harassment through the Ethics Channel.

7. Procedure for Addressing and Resolving Harassment Situations

7.1. Report of the Facts: Ethics Channel

The FC Barcelona Ethics Channel will be used to report harassment situations in order to effectively protect the rights of victims and whistleblowers. It specifically helps ensure the prohibition of reprisals and the confidentiality of personal data.

All members of the Entity must use the Ethics Channel to report any situations of harassment of which they are aware.

Business Partners and Third Parties outside the Entity may also use the Ethics Channel to report acts or situations of harassment of which they are aware.



The procedure to address and resolve harassment does not exclude the possibility of reporting harassment to the administrative labour authorities or labour or criminal judicial bodies. One means of resolution in no case prevents the use of another. The whistleblower will be the person who decides, depending on the situation. Annex II includes the contact details of some of these administrations and authorities.

7.2. Objectives of the Procedure

This procedure is designed to:

- a) Ascertain whether acts of harassment have occurred and the circumstances surrounding them, while gathering evidence to demonstrate the facts.
- b) Ascertain the identity of the people who took part in committing them.
- c) Protect the victim of harassment and help aid in repairing the damage caused to them and in their full recovery.
- d) Detect relevant shortcomings of this protocol that are to be amended.

In all matters not provided for in this protocol, the FC Barcelona Communications Management and Processing Procedure, the Ethics Channel Management Policy, and other related internal regulations will apply.

7.3. Bodies Involved in the Procedure

FC Barcelona must have a Steering Committee made up of at least three people who represent the Compliance Area, the Human Resource Area, and the workers' representation. All of the members should hold a similar position within the organisational hierarchy.

7.3.1 Steering Committee

The **Steering Committee** is entrusted to:

- Be aware of the beginning of any investigation into situations of harassment.
- Be aware of any precautionary measures implemented with regards to the affected person or the victim.
- Ratify the proposed resolution submitted by the Compliance Area by formally signing the act of resolution for the case.
- Ensure compliance with all measures aimed at the repair, assistance and recovery of the harassment victim.
- Evaluate this protocol's effectiveness and compliance, and propose revisions, when appropriate.



7.3.2 Compliance Area

Regardless of the powers and responsibilities defined in other sections of this protocol, the Compliance Area shall promote and coordinate the effective application of this protocol. Its responsibilities are specifically to:

- Manage the Ethics Channel and all reports of harassment situations, and document and record all of the actions of the procedure.
- Investigate the facts that are included in the report.
- Request the participation of support personnel from the Legal Area or parties external to the Entity, when the investigation so justifies it.
- Define precautionary measures and direct the relevant Area within the Entity in adopting them.
- Write a final report on the findings of the investigation.
- Propose the initiation of a disciplinary procedure or other corrective actions or action to protect legitimate interests.
- Summon the Committee to present the conclusions of the investigation.
- Draft the act of resolution for the case based on the Committee meeting.
- Manage a file with the data and information of the procedures to address harassment, in accordance with legal requirements.

The victim must be able to choose the gender of the person from the Compliance Area assigned to guide them.

7.4. Procedure Initiation

Any report of acts of harassment will lead to the initiation of an investigation procedure, as per this protocol.

The investigation will be initiated upon the decision of the Compliance Area, which will impartially carry it out in order to ascertain enough facts to adopt a final conclusion report.

The Compliance Area has the right to request additional information from the whistleblower to decide whether to initiate the procedure, when necessary and in accordance with the regulations of the Ethics Channel.

The Compliance Area must guarantee the confidentiality of the entire procedure. When the investigation involves members of the governing bodies or executive positions of the Entity are supposed to intervene at some phase of the procedure, as per this protocol, the corresponding bodies or positions will be prevented from having any knowledge of such by enacting a specifically secret procedure.



All members of the Entity and Business Partners have an obligation to collaborate in the investigation, when the Compliance Area so requires.

7.5. Final Report

The Compliance Area will prepare a final report analysing the investigated facts and the conclusions, in accordance with the Consultation Management and Processing Procedure. This report will include a resolution.

When the conduct is attributed to a person working for a Business Partner, the final investigation report will propose that the Legal Area review or terminate the contract, agreement, protocol or regime that governs the relationship with the perpetrator, and study possible actions to demand liabilities that the harassment may have caused, at all times keeping the victim informed of the facts.

7.6. Adoption of the Resolution

The final report will include a proposed resolution that will be submitted to the Steering Committee for ratification.

Subsequently, the Compliance Area will draw up an act that reports the facts in a summarised and anonymised manner, along with the conclusions and the resolution of the Steering Committee. This document must be formally signed by the members of the Committee.

7.7. Disciplinary Responsibilities

Disciplinary offences are actions by Members of the Entity that are contrary to the law, internal FC Barcelona regulations, the applicable collective bargaining agreement or the labour legislation provided for in this regard.

The Human Resources Area is responsible for initiating and instructing disciplinary files related to acts of harassment by Members of the Entity, for ratifying or overturning decisions to impose precautionary measures on the reported perpetrator, and for drafting a proposal for resolution of the disciplinary procedure through a recommended penalty, which must be approved by the Board of Directors of the Entity.

The statute of limitations for disciplinary offences and for the expiration of procedures must be especially taken into account when applying this protocol.

7.8. Recovery and Repair for Victims

In accordance with the objectives of the protocol, the Final Report must include the repair actions for the victim. Repair actions are measures that must be undertaken to contribute to restoring, for the victim, all areas that have been damaged by the harassment situation.

The following are repair measures, among others: compensation of the victim; physical, psychological and social recovery; immediate restitution of the work situation prior to



harassment (for example, a return to the office); symbolic repair through specific actions that demonstrate the Entity's commitment; or measures aimed at guaranteeing non-repetition.

Repair measures must also take into account the collective impact of harassment situations.

The Steering Committee will ensure that the measures for the assistance, recovery and repair of the victim of harassment proposed in the final report are duly implemented.

8. Monitoring, Evaluation and Review of the Protocol

In response to situations and results after applying this Protocol and the standard operating procedure for internal workplace harassment grievances, FC Barcelona will take the measures that it deems most appropriate for their monitoring, evaluation and review.

Thus, in order to prevent possible similar future situations, FC Barcelona may adopt the following measures, among others:

- Organisational and labour changes (such as the reduction or reordering of work times, geographic mobility, change of workplace, adaptation of the workplace, suspension of the employment relationship reserving the job, among other measures).
- Modification or adoption of internal policies and procedures.
- Special training sessions and other awareness-raising actions.
- Providing support for a return to work, in cases of disability.

Beyond the previously stipulated periodic reviews, the Compliance Area will propose revisions of this protocol in light of relevant regulatory changes, changes in the structure of the Entity (such as changes in processes, decision-making bodies, corporate objective, work sites, etc.) or as a result of relevant events that determine a need to adapt or improve this protocol.



Annex I: Definitions

a) *Ethics Channel*

Reporting channel that guarantees the direct, confidential and secure reporting of communications, both by the Members of the Organisation and by Third Parties.

b) *Report*

Information relating to actions and omissions that may constitute an infringement or breach of current law and FC Barcelona internal regulations.

c) *Reported Perpetrator*

The person affected by a report.

d) *Whistleblower*

The person who makes the report.

e) *Victim*

The person who suffers harassment.

f) *FC Barcelona/Entity*

This includes Futbol Club Barcelona and all of its related entities.

g) *Members of the Entity*

Members of the members of the Board of Directors, the governing bodies of the entities that make up FC Barcelona and the executives, sports professionals (players and technical staff), workers, temporary workers or those under collaboration agreements, volunteers and the rest of individuals hierarchically subordinated to any of the above.

h) *Business Partners*

Any legal or natural person that is not a Member of the Entity, with which the Entity maintains or plans to establish any type of business relationship. These include, among others, intermediaries such as agents, commission agents, external advisers, joint ventures or natural or legal persons contracted by FC Barcelona for the delivery of goods or the provision of services.

i) *Witness*

Any person with first-hand news or knowledge of a situation, whether of the acts of harassment or any other circumstance relevant to the context of a harassment situation.

j) *Third Party*

A natural or legal person or an independent body of the Entity.

k) *Second-Order Violence*

This consists of physical or psychological violence, reprisals of any kind, humiliation and persecution against people who accompany or support victims of harassment. It includes acts that frustrate the preventing, detecting and addressing of the harassment and the recovery of the affected people.



Annex II: EXTERNAL REPORTING AND COMMUNICATION CHANNELS

- **Labour Inspection (administrative route)**

File a report with the Labour Inspectorate.

- **Labour Court of Catalonia (administrative route)**

File a settlement claim.

- **Labour Matters (legal route)**

File a report.

- **Criminal Matters (legal route)**

File a report or lawsuit.

- **Independent Whistleblower Protection Authority**

Any natural person may report any actions or omissions provided for in Law 2/2023 of 20 February regulating the protection of persons reporting regulatory infringements and the fight against corruption to the Independent Whistleblower Protection Authority (Autoritat Independent de Protecció de l'Informant, AAI), or to the corresponding regional authorities or bodies.

In the case of Catalonia, the corresponding autonomous body is the Anti-Fraud Office of Catalonia. You can find more information at: <https://antifrau.cat/ca>

- **Offices for support to victims of offences**

These offices offer care, support and guidance to victims and people harmed by offences or misdemeanours; they are the coordination point for restraining orders for victims of domestic and gender-based violence, as adopted by the judicial bodies in Catalonia.

You can find more information about the addresses and telephone numbers of the offices at: <https://web.gencat.cat/ca/adreces-i-telefons/index.html?codi=17174&jq=200001>

- **Mossos d'Esquadra. Police force of the Autonomous Government of Catalonia**

They have different reporting and advisory channels:

- Telephone: 112
- WhatsApp instant messaging: 601 00 11 22
- Email: mossos.atenciovictimes@gencat.cat



Annex III: Examples of Behaviours Constituting Harassment

This annex includes a list of examples that could be classified as behaviours constituting workplace harassment in certain circumstances (intention, regularity, intensity). It must be taken into account that this list is in no case a closed list of an exclusive or limiting nature.

Workplace harassment

- Isolation at work.
- Assigning, on a recurring basis, tasks or work below the capacity or competence of the person.
- Excessive and continuous overload of work.
- Not assigning any task or assigning meaningless or degrading tasks.
- Denying or concealing the means for doing a job or providing erroneous data.
- Decreasing the tasks of the worker.
- Showing a lack of respect at work through yelling or insults.
- Attacking one's private life and personal or professional reputation.
- Excessive threats or pressures.
- Denial or difficulties in accessing leave, courses, activities, etc., provided such requests are reasonable.

Discriminatory harassment

- Treating the person less favourably than another worker based on race, religion, ethnicity, etc.
- Placing people of a particular racial or ethnic origin at a particular disadvantage with respect to others, without justification or objective practical criteria.
- Denying a person a benefit to which they are entitled due to their ideology, sexual orientation, family situation, etc.
- Using offensive ways to address a person, ridiculing them or undervaluing their abilities, skills and intellectual potential because of their sexual orientation.