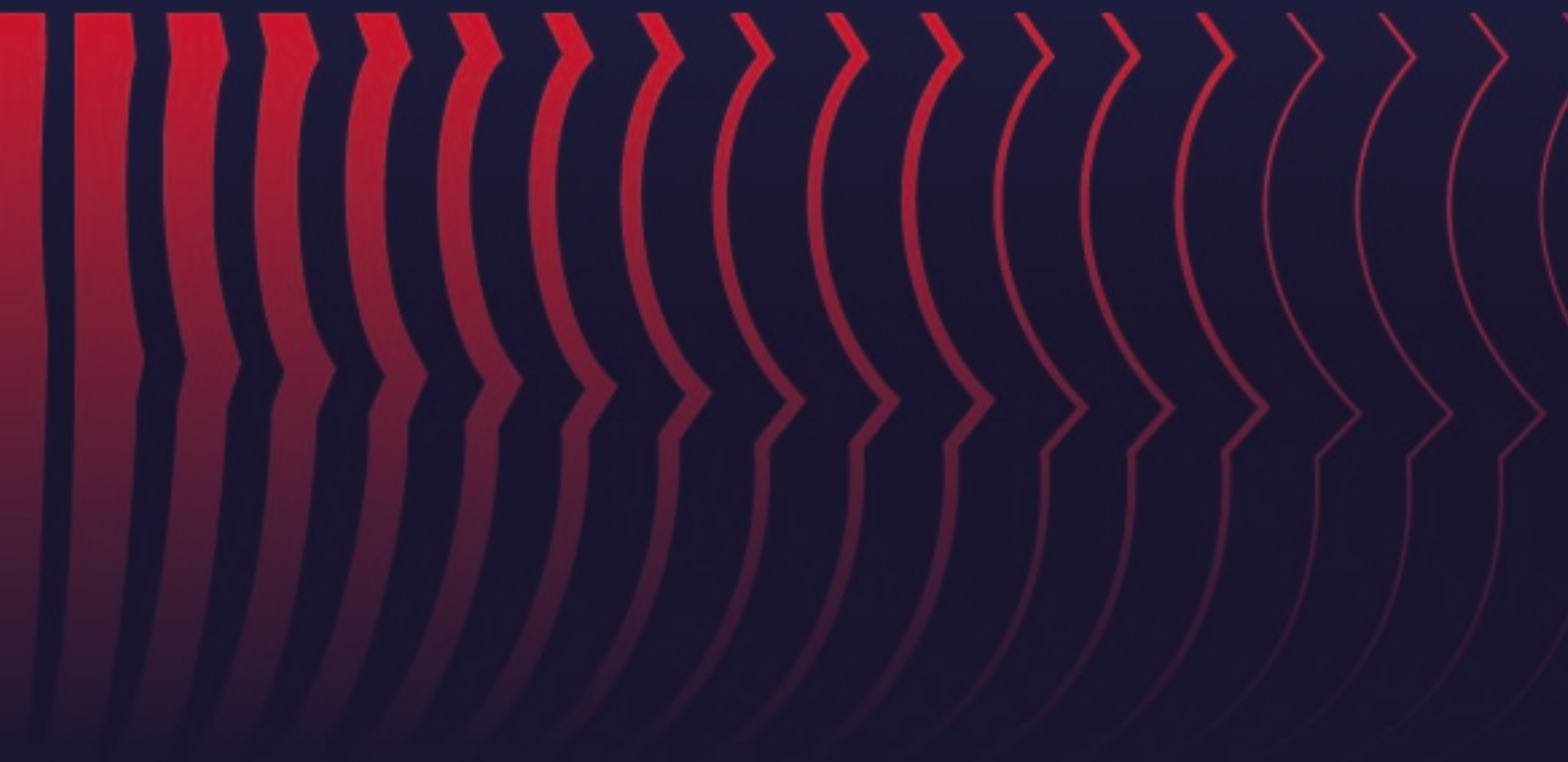


# **Protocol for preventing and addressing harassment based on gender, sexual orientation, gender identity or gender expression**

**VERSION 03  
DECEMBER 2025**





IMPORTANT INFORMATION ABOUT THIS DOCUMENT	
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<b>Rules it develops</b>	Compliance Policy Code of Ethics
<b>Rules it replaces/changes</b>	Protocol for the prevention, detection and resolution of sexual, gender-based or workplace harassment (v2)
<b>Related rules</b>	Other documents that make up the <i>Compliance Management System</i> of FC BARCELONA
<b>Business unit or function it affects</b>	All units and functions of FC BARCELONA and its related entities
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## 1. Commitment of the President of FC Barcelona

I have the honour of presenting the newly drafted FC Barcelona **Protocol for Preventing and Addressing Harassment Based on Gender, Sexual Orientation, Gender Identity or Gender Expression**, an initiative that reaffirms our inalienable commitment to promoting the democratic values of equality and non-discrimination. This is so reflected in the FC Barcelona Bylaws, which clearly state that we must promote these values and consequently fight for the eradication of all sexist, homophobic and racist attitudes in sport, the social sphere and, of course, within our own organisation.

Barça's greatness is not only measured by the championships it wins—our values should be a beacon around the world. We understand that our Club's strong position makes us an organisation that can promote social change. We are fully aware of our significance in Catalan society as a whole and of our influence on the rest of the world.

FC Barcelona members are fully committed to fighting and eradicating violence against women and LGBTIphobia. We must recognise the fact that we live in a historically patriarchal society, where gender roles have led to discrimination against women and people in the LGBTI community. These attitudes, which unfortunately also manifest themselves within our organisation, are a serious violation of the human rights of women and people in the LGBTI community.

We have therefore worked constantly in recent years to establish a culture of integrity and respect within our organisation, with the firm aim of becoming a safe space that respects and dignifies all of the people who form part of our entity. FC Barcelona is fully committed to identifying and eradicating these discriminatory attitudes and to developing a culture of integrity and respect within our organisation.

This Protocol is an essential part of the policy within our Equality Plan. It is one of the most important measures and embodies the Club's firm commitment to creating working relationships based on non-discrimination, gender equality, and safety. This initiative reaffirms our unwavering desire to promote a comprehensive transformation in labour relations. It guarantees our commitment to protecting the well-being of all people by eliminating any trace of violence and discrimination against women and people in the LGBTI community, and by promoting safe spaces that respect and dignify all members of our community.



It is important to note that this Protocol is not a one-off policy. It is, on the one hand, a declaration of our organisation's fundamental values. On the other, it is an essential tool for identifying problems related to situations of risk for women and people in the LGBTI community and, as such, for preventing and detecting incidents. It places the focus on the victim by preventing revictimisation, by addressing their complete repair, and by protecting whistleblowers from reprisals.

We are proud of the steps we are taking, as they help us to reflect on who we are as a Club and what we represent. We will continue to work to ensure that FC Barcelona is a human ecosystem where everyone feels safe, respected and valued.

Joan Laporta Estruch

President of FC Barcelona



## 2. Regulatory framework

Equality of women and men, as well as equal treatment and non-discrimination based on gender, sexual orientation, gender identity or gender expression are recognised in various European, Spanish and Catalan regulations. Furthermore, the applicable regulatory framework considers harassment a form of discrimination.

Directive 2006/54/EC of the European Parliament and of the Council of 5 July 2006 on the implementation of the principle of equal opportunities and equal treatment between men and women in matters of employment and occupation recognises sexual and gender-based harassment as a form of discrimination, and encourages Member States to take effective measures for their prevention.

Organic Law 3/2007 of 22 March for the effective equality of men and women also recognises sexual or gender-based harassment as discriminatory acts.

Law 5/2008 of 24 April on the right of women to eradicate violence against women includes sexual and gender-based harassment as a form of violence against women that may occur, among others, in the workplace.

The state regulatory framework establishes obligations for companies to combat this phenomenon. In particular, Organic Law 3/2007 for the effective equality of women and men establishes the obligation of companies to promote conditions to ensure workplaces free of harassment, as well as the obligation, for companies with a workforce of more than 50 people, to have equality plans that include measures to prevent sexual and gender-based harassment. Moreover, Organic Law 10/2022 of 6 September on the integral guarantee of sexual freedom states that these measures must include specific procedures for responding to reports and grievances that may be made by victims of these situations. In relation to equality plans, Royal Decree 901/2020 of 13 October, which regulates equality plans and their registration, should also be mentioned. Finally, within the scope of labour, Law 31/1995 of 8 November on the Prevention of Occupational Risks is also applicable.

In relation to the guarantee of LGBTI rights, the Catalan legal framework, through Law 11/2014 of 10 October on the guarantee of the rights of lesbians, gays, bisexuals, transgender and intersex people and to eradicate homophobia, biphobia and transphobia, establishes the obligation of companies to respect the equality of treatment and opportunities of people in the LGBTI community by taking measures aimed at preventing any type of labour discrimination. Furthermore, Law 19/2020 of 30 December on equal treatment and non-discrimination determines that all sports practice must respect the dignity of people and the right to equal treatment, and avoid all forms of discrimination and stigmatisation.

The National Regulatory Framework, According to Law 4/2023 of 28 February for the real and effective equality of trans people and for the guarantee of the rights of people in the LGBTI community establishes the obligation of companies to have a planned set of measures and resources to ensure the real and effective equality of people in the LGBTI



community, as well as a response protocol for addressing harassment or violence against LGBTI persons within 12 months of the entry into force of this law.

In the same vein, within the framework of state regulations, Royal Decree 1026/2024, of 8 October, which develops the planned set of measures for equality and non-discrimination of LGBTI people in companies, establishes the measures that companies must adopt to eliminate discrimination in the workplace. Among others, Annex II of the Royal Decree includes the minimum measures that must be contained in the action protocols against harassment and violence against LGBTI people.

### 3. Goal

This protocol aims to prevent cases of sexual harassment based on gender, sexual orientation, gender identity or gender expression, and ensure remedy for victims when a situation of harassment occurs. This protocol is part of the prevention measures provided for in the FC Barcelona Equality Plan.

Its specific goals are to:

- a) Develop prevention strategies to eradicate these behaviours and better detect them when they occur.
- b) Establish fast and efficient intervention circuits in the case of a report.
- c) Define the roles and responsibilities of all parties involved in this protocol.
- d) Guarantee the rights of the victim, the whistleblower, the reported perpetrator and any witnesses and, particularly, as regards the confidentiality of their personal data.
- e) Establish measures to guide and guarantee the safety and integrity of the victim and the whistleblower.
- f) Provide comprehensive protection for the victim, including by adopting precautionary measures, when necessary.
- g) 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 party or FC Barcelona itself can freely take the legal action they deem appropriate. FC Barcelona must provide access and support for victims and whistleblowers reporting to formal routes of justice when necessary, especially in the most serious cases.



## 4. Scope of Application

This protocol applies to situations within the following three areas: objective, spatial and subjective.

### 4.1. Objective Scope

This protocol applies to situations constituting sexual harassment based on gender, sexual orientation, gender identity or gender expression, according to the following definitions:

- **Sexual harassment:** any verbal, nonverbal or physical behaviour of a sexual nature that is unwanted by the victim and that aims to produce the effect of attacking the dignity and freedom of a person or to create an intimidating, hostile, degrading, humiliating, offensive or annoying environment.
- **Gender-based harassment:** any behaviour based on the gender of a person, the purpose or effect of which is to attack their dignity or physical or mental integrity or to create an intimidating, hostile, degrading, humiliating, offensive or annoying environment. Furthermore, unfavourable treatment relating to pregnancy or maternity is also considered gender-based discrimination.
- **Harassment based on sexual orientation, gender identity or gender expression:** any behaviour based on the sexual orientation, gender identity or gender expression of a person, the purpose or effect of which is to attack their dignity or physical or mental integrity or to create an intimidating, hostile, degrading, humiliating, offensive or annoying environment.

Harassment is a phenomenon that encompasses very diverse behaviours, which in no case can be limited to a specific list. This protocol cannot go ignored by making restrictive interpretations of its scope in the face of information or facts linked to behaviours aimed at violating the integrity or sexual freedom or harming the freedom and integrity of victims, when these behaviours appear to be linked to the gender of the victim or their sexual orientation, gender identity or gender expression.

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.

Given the patriarchal nature of society, sexual harassment and gender-based behaviours mostly affect women.



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. In cases of sexual harassment, a single conduct alone may constitute a case of harassment.

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.

## **4.2. Physical Scope**

This protocol applies to harassment and violence that occur 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.

## **4.3. Subjective Scope**

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

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.

Likewise, the system of protecting the general public attending sports events and competitions must be regulated through a specific protocol in the case of harassment



committed by people without any link with the Entity but when it has occurred on the Entity's premises.

Any person linked with FC Barcelona or its Business Partners who apply its internal regulations will be subject to this protocol, including but not limited to:

- Individuals with management or high-level authority, tasks or responsibilities, executive staff or members of the Board of Directors.
- Employees or parties with any contractual relationship, including irregular or dismissed staff, and including staff in the sports area.
- Workers of contractors, subcontractors, and temporary employment companies.
- Volunteers, interns, applicants and job seekers.

## 5. 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:

- **Focus on the victim**

At all times, the rights and dignity of the victim and their welfare must take maximum priority, ahead of the interests related to the intervention procedure. This approach refers to a systematic way of dealing with victims. It requires empathetic, individualised attention that fosters an environment of trust, safety and confidentiality, and protects them from any stigmatisation, discrimination, retaliation or repeat victimisation.

The freely expressed will of victims must be respected in relation to the initiation and course of the procedure to address cases that affect them, as well as potential access to the formal justice system.

- **Repeat victimisation**

Intervention must be carried out respectfully with victims by prioritizing their needs and avoiding treatment that could cause additional damage. In this regard, it is necessary to:

- Provide personalised attention and establish a climate of trust, safety and confidentiality.
- Have the necessary resources to offer the victim adequate care, including a decent and comfortable space where they may be attended to.
- Provide clear information about the process, its different stages, who will intervene, and the possible results.
- Allow the victim, should they so wish, to be guided through the process by the person(s) they choose.
- Avoid comments that may call the victim's story into question and avoid reinterpreting the facts.



- Avoid forcing the victim to repeat the facts multiple times.
- Adapt to each person's pace.

- **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.

In addition, respect and protection of the privacy and dignity of the people affected must be ensured, offering fair treatment to all the people involved throughout the procedure.

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, prohibition and nullity of reprisals**

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

In this sense, any act constituting retaliation, including threats or attempts at retaliation against people who present a communication, appear as witnesses or collaborate in an investigation of potential harassment, is expressly prohibited and will be null and void.

- **Gender perspective**

In any intervention, the differences between women and men in their biological, historical, financial, social and cultural dimension must be taken into account, as well as how the structure of the gender-based system impacts women and people in the LGBTI community. The gender perspective must be incorporated with the aim of taking into account the way in which these interventions affect women and people in the LGBTI community, thus helping eradicating inequalities.

- **Intersectionality**

All interventions must take into account the aggravated and specific forms of discrimination that a woman or a person in the LGBTI community could suffer because they belong to other groups that are also usually discriminated against.

- **Human rights-based approach**

Sexual harassment based on gender, sexual orientation, gender identity or gender expression is an attack on human rights. Consequently, any action taken within the framework of application of this protocol must be carried out from the perspective of protection and promotion of human rights.



- **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 reported perpetrator 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.

- **Contradiction**

The principle of contradiction in the investigation and resolution of the communication is guaranteed, in order to ensure a fair hearing and fair treatment for all those affected. This principle implies that both the person affected by the communication and the informant have the opportunity to be heard, present evidence and defend their interests throughout the procedure.

- **Speedy procedure and due diligence**

Both the victim and the reported perpetrator 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.

## **6. Prevention measures**

### **6.1. Corporate Commitment**

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

### **6.2. Distribution of the Protocol**

Any Member of the Entity or Business Partners must be aware of the existence and understand the content of this protocol to make it an effective tool for eradicating harassment.

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*).



- Produce and distribute information on the protocol through appropriate internal channels such as the intranet (*Basilea*) and informative leaflets or other systems to which the staff of Business Partners also have access.
- Publish this protocol on the website.

### **6.3. Training**

FC Barcelona must develop compulsory training sessions on this matter for Members of the Entity, adapted to its different groups. In particular, the Entity must organise:

- Basic training for each Member of the Entity.
- Basic training for players.
- Specialised training for staff under their direction or supervision to other members of the Entity.
- Specialised training for sports staff, to which Royal Decree 1006/1985 of 26 June regulating the special employment relationship of professional athletes is applicable.
- Specialised training for medical staff.
- Specialised training for people with a specific role in addressing situations of harassment, which includes both the people defined in Section 8 and the people involved in the procedure defined in Section 9.

Annex IV includes a proposal of content for the training, based on the group it addresses.

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

### **6.4. Awareness-Raising**

FC Barcelona must develop awareness-raising campaigns for Members of the Entity. In particular, it must disseminate content that states:

- The organisation's commitment to zero tolerance of harassment, violence against women and LGBTIphobia.
- Information on the multiple forms of workplace harassment and, in particular, information on sexual harassment based on gender, sexual orientation, gender identity or gender expression, as well as indicators for its detection.
- Codes of best professional practices and guidelines.



## **6.5. Adherence to Institutional Campaigns to Eradicate Violence Against Women and LGBTIphobia**

FC Barcelona must develop actions to support institutional campaigns to raise awareness and demand action by using data on violence against women and LGBTIphobia. This includes the International Day against LGBTIphobia in sports (19 February) or the International Day for the Elimination of Violence against Women (25 November).

## **6.6. Prevention Measures for Business Partners**

FC Barcelona must ask its Business Partners to contractually confirm the obligations derived from this protocol or 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.

## **6.7. Coordination with Policies on Gender Equality, Sexual AND Gender Diversity and Non-Discrimination within the Entity**

In order to eliminate the risk factors that lead to situations of discrimination, violence or harassment, FC Barcelona must enact policies regarding gender equality, sexual and gender diversity and non-discrimination, in accordance with the Plan for the equality of men and women and other action plans that FC Barcelona may adopt in the field of LGBTI rights.

Within the framework of these policies, FC Barcelona must:

- Include the gender perspective and the LGBTI perspective in occupational risk prevention measures.
- Take into account conduct that could be considered gender-based harassment in the settlement policies and guidelines produced on this matter.
- Incorporate specific recommendations regarding gender-based and LGBTIphobic violence in its Inclusive and Non-Sexist Communication Guide, particularly to prevent repeat victimisation.

## **7. 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 instruments for detection within the framework of the awareness policies detailed in Section 6.4 and including content to help detect harassment situations through the training sessions detailed in Section 6.6, FC Barcelona must take 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 report of sexual harassment based on gender, sexual orientation, sexual identity or gender expression in the workplace through the Ethics Channel.
- Have an FAQs section on the internal regulatory portal that helps identify possible harassment situations and provides information on the network of people of reference, the ways of reporting harassment behaviours, the management procedure, and its guarantees.
- Have people of reference to assist victims and witnesses of harassment situations.

## 8. Network of People of Reference

FC Barcelona must have people of reference available to assist the victims, whistleblowers and witnesses of a harassment situation.

The network must be made up of people with specific training, in accordance with the requirements detailed in Section 6.3. FC Barcelona must ensure that the people who make up the network can spend enough time on performing their tasks.

With total confidentiality, they must actively listen to the person experiencing harassment—either as a victim, whistleblower or witness. Their role is to help understand and evaluate the situation, to provide information on the mechanisms existing to report facts constituting harassment, as well as on protective measures, and to provide guidance throughout the entire procedure. They must also provide assistance to those wanting to report facts.

The support tasks carried out by the people of reference will in no case imply an exemption of the reporting procedure through the Ethics Channel, in accordance with this protocol, the Ethics Channel Management Policy, and other applicable internal regulations. However, the obligation to respect the victim's decision in accordance with the criteria established in section 9.5 of this protocol applies to the people in the reference network.

The list of people who make up the network, as well as their contact details, must be published on the intranet. People who are in a situation of harassment can go to any of the people who belong to the network. People of reference must guarantee the confidentiality of the procedure at all times.

## 9. Procedure for Addressing and Resolving Harassment Situations

### 9.1. Report of the Facts: Ethics Channel

The FC Barcelona [Ethics Channel](https://canaleticfcbarcelona.integrityline.com) (https://canaleticfcbarcelona.integrityline.com) 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 and Business Partners are obliged to use the Ethics Channel to report any situations of harassment of which they are aware.

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 police, the administrative labour authorities or labour or criminal judicial bodies. Annex II includes the contact details of some of these administrations and authorities.

## 9.2. 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.

## 9.3. 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, who must have the training indicated in Section 6.3. At least one of the three members of the Steering Committee must be a member of the Equality Committee. All of the members should hold a similar position within the organisational hierarchy.

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 reported perpetrator or the victim.
- Where applicable, debate and 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.

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 Steering Committee to present the conclusions of the investigation and the proposal for a resolution of the case.
- Draft the minutes resulting from the Steering 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.

## **9.4. 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.

## **9.5. Respect for the Wishes of the Victim**

According to a victim-focused approach, when the decision expressed by the victim shows an unequivocal, free and informed desire not to go through with the response procedure, the Compliance Area will not initiate any kind of investigation of the facts or will stop the investigation if it has already begun.

In any case, any effort to discourage, demoralise or influence the free wishes of the victim or whistleblower in a harassment situation will be considered a very serious violation of the Entity's ethics regulations, particularly when done by the reported perpetrator themselves or a person whose hierarchical position within the organisation is above the victim, the whistleblower or the reported perpetrator.

The victim's decision under the conditions stated above would stop any investigation into the facts. Nonetheless, the Compliance Area may urge acts that are different from those of this protocol, to resolve situations that demonstrate the existence of certain risks:

- If the facts constitute a public crime, the Compliance Area must ask the Board of Directors to inform the Public Prosecutor's Office, taking urgent action to preserve appropriate sources of evidence.
- If the facts reveal a situation of ongoing harassment that must be stopped or show that additional facts are foreseeable in the future and must be avoided, the Compliance Area, regardless of respecting the decision of non-intervention of the victim, must take appropriate actions to protect occupational health.

Where the investigation does not begin or is interrupted upon the decision or request of the victim, the Compliance Area must inform the Steering Committee.

In those cases in which the communication was not filed directly by the victim of the facts, it will be necessary to have their express and informed consent to start the investigation.

## **9.6. Other Cases when Investigations Would Not Apply**

Reports that are completely unfounded, according to the opinion of the person responsible for managing the Ethics Channel or Compliance Area, will not lead to any action. This is regardless of the general duty to document and record the procedures and the possibility of initiating a disciplinary procedure if the whistleblower filed the report recklessly or in bad faith.

Nor will the procedure be initiated in the event of reports that provided no new information regarding facts that have already been addressed and resolved in a previous procedure.



The Compliance Area may decide to restrict or not address the issue at all if a concurrent investigation procedure is ongoing, so as not to harm the investigation of the facts and the people responsible for them and not to cause additional harm to the victim, respecting in any case the opinion of the victim of the facts.

Where an investigation is not initiated, the person who had filed the report will be informed of this circumstance.

## **9.7. Preliminary and Urgent Investigations**

The Compliance Area may conduct any consultations and investigations as strictly necessary to corroborate the circumstances of the events and identify the people who participated in them, with respect to reports lacking a sufficient basis to determine whether or not to carry out the procedure indicated in this protocol.

The Compliance Area can, on its own initiative and without having to wait for other procedures to conclude, take any urgent actions needed to collect or secure evidence that may be likely to disappear or to avoid imminent damages, particularly by protecting the victim and ensuring that whistleblowers are not subject to reprisals. Once the urgent situation has been overcome, the procedures regulated in this protocol must be continued.

## **9.8. Investigation of the Facts and Precautionary Measures**

The Compliance Area will investigate the facts in accordance with the FC Barcelona Communications Management and Processing Procedure or any other regulations that replace or supplement it, it being hereby specified that the deadline to conclude the investigation will be two months. It may take the precautionary measures that it deems appropriate, in accordance with this procedure.

In accordance with the reporting principles of the regulations on eradicating gender-based harassment, the reported perpetrator must demonstrate that no discrimination has occurred, and the measures adopted, considered discriminatory by the victim, must be proportional.

## **9.9. Final Report and Proposed Resolution**

The Compliance Area will draw up a final report of the investigated facts and conclusions, in accordance with the FC Barcelona Report Management and Processing Procedure or any other regulations that replace or supplement it, and will inform the Steering Committee of such.

The final report will include, in accordance with the provisions of the FC Barcelona Communications Management and Processing Procedure, the identification of the file number, the description of the facts communicated, the applicable regulations, the actions carried out, the conclusions and the final proposal for resolution. This proposal for a resolution will indicate either that there have been indications of harassment that is the subject of the protocol, or that there are no indications of harassment that is the subject of



the protocol. Likewise, the final report must include a proposal with actions of repair for the victim.

The Steering Committee must discuss and, where appropriate, ratify the proposal. In this sense, once the resolution is made whether to classify the facts as harassment, the conclusion is shared with those responsible within the Human Resource Area so that they can assess, when applicable, the applicable penalty according to the collective bargaining agreement.

In those cases in which there is no evidence of the existence of a situation of harassment, the communication will be archived.

## **9.10. Signs of Crime**

If the investigation has revealed the existence of facts constituting a public crime subject to the duty of disclosure, the conclusions must urge the Board of Directors to inform the Public Prosecutor's Office.

When the facts constitute a prosecutable crime only when a victim reports them, the wishes expressed by the victim must be respected when deciding on whether or not to inform the Public Prosecutor's Office.

When the facts constitute a crime that can generate criminal liability for the Entity, the Board of Directors must decide whether or not to inform the Public Prosecutor's Office, regardless of all actions necessary being taken to protect and repair the victim and avoid a repetition of the facts.

## **9.11. 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 Resource Area is responsible for initiating and instructing disciplinary files related to acts of harassment by any Member of the Entity, for ratifying or overturning decisions to impose precautionary measures on the reported perpetrator and for drafting a proposal for terminating the disciplinary file through a recommended penalty, which must be approved by the Board of Directors of the Entity.

In the application of this protocol, special account must be taken of the existence of legal limitation periods established in collective agreements relating to disciplinary offences and those of expiry of files.

## **9.12. Recovery and Repair for Victims**

In accordance with the objectives of the protocol and Section 9.9, 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.

In this sense, the entity will restore the affected person to their previous working conditions that had been modified as a direct or indirect consequence of the situation of harassment.

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 proposed measures aimed at the repair, assistance and recovery of the victim of harassment are duly implemented.

## **10. Monitoring, Evaluation and Review of the Protocol**

The Compliance Area and the Equality Committee must monitor and evaluate the operation of this protocol in order to promote its review for improvement purposes.

Both bodies must prepare an annual evaluation report based on the experience obtained from the application of the protocol. The annual report must take into account the conclusions of the Final Reports on the addressing of cases of harassment that have occurred which, as a general rule, must include measures to ensure that the situation produced is not repeated, sometimes through proposals for revision and modification of this protocol, if deemed necessary.

Coinciding with the periods of revision of the Equality Plan, the Compliance Area and the Equality Committee must make a reasoned proposal to maintain or review this protocol, based on the conclusions of the annual evaluation reports.

In order to propose improvements to this protocol, the Compliance Area and the Equality Committee will be able to address the following indicators, which include but are not limited to:

- The number of cases of harassment that have occurred or that were about to occur and their specific characteristics.
- The number of people trained and degree of training in accordance with that indicated in the training section of this protocol.
- The number and frequency of queries related to harassment issues made through the Ethics Channel.
- Adaptation of the resources available for the correct application of this protocol and analysis of the dedicated response time.
- Any other predictive indicator on the effectiveness of this protocol.



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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***

Channel that guarantees a direct, confidential and secure means of reporting, both by any Member of the Entity and by third parties.

### **b) *Report***

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

### **c) *Gender Expression***

A way in which a person externally manifests elements that have to do with gender, whether through clothing or appearance in general, behaviour, affinities, etc.

### **d) *FC Barcelona/Entity***

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

### **e) *Gender Identity***

A feeling of belonging to a particular gender, regardless of the sex assigned at birth.

### **f) *Members of the Entity***

Any member of the Board of Directors and 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.

### **g) *Sexual Orientation***

A person's tendency to feel or not feel sexual attraction to other people according to the sex or gender to which they belong.

### **h) *Reported Perpetrator***

A person to whom harassing behaviour is provisionally attributed. In the regulations protecting whistleblowers, these parties are often referred to the person "reported".

### **i) *Whistleblower***

A person who reports or discloses information on acts of harassment through the Ethics Channel.

### **j) *Business Partners***

Any legal or natural person that is not a Member of the Entity, with which the Entity maintains or foresees to establish any type of business relationship. These include, among others, intermediaries such as agents, commission agents, external advisers,



people linked through joint ventures or natural or legal persons contracted by FC Barcelona for the delivery of goods or the provision of services.

**k) *Steering Committee***

The Steering Committee is made up of members of HR, Compliance and the Workers' Committee who participate in the process of addressing cases of harassment.

**l) *Equality Committee***

The Committee is made up of representatives of the company and workers whose objective is to ensure and guarantee equal opportunities between men and women in the entity and who lead the Club's Equality Plan.

**m) *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.

**n) *Third Party***

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

**o) *Victim***

The person who suffers harassment.

**p) *Secondary Victimization or Repeat Victimization***

The additional abuse exerted against the victims of harassment, as a direct or indirect consequence of the quantitative and qualitative deficits in interventions that are carried out by the people involved in addressing a situation of harassment, either intentionally, through misguided actions or through negligence.

**q) *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: Support lines and services for victims of violence against women and LGBTIphobic violence**

- **Emergency telephone number: 112**

The 112 emergency telephone centralises all calls for health emergencies, public safety, fire and rescue, and civil protection in emergency situations. It is free of charge, and is the same number throughout Europe. It gives immediate response 24 hours a day.

- **Support line for women in situations of violence: 900 900 120**

The permanent service line 900 900 120 is free of charge and confidential, and operates every day of the year, 24 hours a day. It can be accessed by telephone and email ([900900120@gencat.cat](mailto:900900120@gencat.cat)). It responds to demands related to any form of violence against women.

- **Specialised Intervention Service (Servei d'Intervenció Especialitzada, SIE)**

The Specialised Intervention Service is a free of charge service that offers comprehensive care and resources in the process of recovery and repair to women who have or are currently suffering violence, along with their children. It also focuses on prevention, awareness-raising, and community involvement. It has a multidisciplinary team of professionals composed of people qualified in psychology, social work, social education, law, and labour integration.

You can find more information on the SIE at:

[http://sac.gencat.cat/sacgencat/AppJava/servei\\_fitxa.jsp?codi=13280](http://sac.gencat.cat/sacgencat/AppJava/servei_fitxa.jsp?codi=13280)

- **Municipal and Regional Information and Support Services and Offices for Women (Serveis i oficines d'informació i atenció a les dones municipals i comarcals, SIAD)**

These are information and support services that work in coordination throughout the territory. The information offices of the Catalan Institute of Women and the Information and Support Services for Women (SIAD), on both a municipal and a regional level, provide information on any matter, including health, work, housing, services and resources for women and, if necessary, may refer inquiring parties to the entities and organisations to which they belong.

You can find more information on SIAD at:

[https://dones.gencat.cat/ca/ambits/violencia\\_masclista/recursos\\_atencio/mapa\\_siad/](https://dones.gencat.cat/ca/ambits/violencia_masclista/recursos_atencio/mapa_siad/)

- **The Comprehensive Care Network (SAI)**

The LGBTI+ SAI is a comprehensive service to inform, support and raise awareness among individuals and entities about sexual orientation, gender identity and expression, and to



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prevent LGBTIphobia. It serves LGBTI+ people, their environment, and professionals working in sensitive areas.

You can learn more about the SAI Comprehensive Care Network at:

<https://igualtat.gencat.cat/ca/ambits-dactuacio/lgbti/Serveis-i-tramits-de-la-Xarxa-dAtencio-Integral-SAI/index.html>

- **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-telefonos/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](mailto:mossos.atenciovictimes@gencat.cat)



## **Annex III: Examples of behaviours constituting harassment**

This annex includes a list of examples of conduct that may constitute harassment that, in no case, is intended to be a closed list of an exclusive or limiting nature.

### ***Sexual harassment***

Verbal behaviours:

- Making sexist jokes and comments.
- Making obscene comments about a person's appearance.
- Explaining sexual practices, fantasies or preferences and/or asking about them.
- Making verbal innuendos of a sexual nature.
- Making open requests for sexual intercourse, with or without pressuring for it.
- Persistently inviting the person to social activities when they have clearly indicated that such invitations are unwanted.
- Inviting them to meet outside of work to talk about labour-related issues.
- Asking for sexual favours under threat and/or coercion.

Non-verbal behaviour:

- Making obscene gestures, direct lewd gazes or pressing or intimidating for sexual intercourse.
- Decorating the workplace with sexual images.
- Entering opposite sex changing rooms without permission.
- Staying in the opposite sex changing rooms while people are changing or showering.
- Spying on the changing rooms.
- Sending messages or images of a sexual nature, or requesting such images, by telephone, email, social networks, etc.

Physical behaviour:

- Repeatedly invading a person's physical space.
- Grabbing, rubbing, touching, etc.
- Sexually assaulting someone through acts that violate their sexual integrity without consent.

Behaviour on social media:

- Cyber-harassment

### ***Gender-based sexual harassment***

- Persistently making sexist jokes and comments.
- Ridiculing people for performing tasks that do not conform to gender stereotypes.
- Treating people degradingly or negatively based on their gender.



- Undervaluing the work of women.
- Entrusting women with very simple or very difficult tasks that do not correspond to the responsibilities of the job or imposing demands or deadlines that are not feasible.
- Making it more difficult for women to achieve a promotion based on gender.
- Not granting maternity or paternity leave or other leave related to family care.
- Any unfavourable treatment due to pregnancy.

### ***Harassment based on sexual orientation***

- Making jokes and ridiculing lesbian, gay or bisexual people using stereotypes.
- Making comments that incite homophobia, lesbophobia or biphobia.
- Treating a person in a degrading or negative way because of their sexual orientation.
- Making it more difficult for people to achieve a promotion based on sexual orientation.
- Denying someone a job based on sexual orientation.
- Denying someone their corresponding marriage, maternity or paternity leave.
- Considering lesbian, gay or bisexual groups as groups at risk of sexually transmitted diseases.

### ***Harassment based on gender identity***

- Using the previous name of a person who is transitioning or has already transitioned.
- Referring to someone in the previous gender when they are transitioning or have already transitioned.
- Not allowing trans people to enter changing rooms, bathrooms or other facilities that correspond to their new gender.

### ***Harassment based on gender expression***

- Ridiculing people for the way they dress, talk, move, or look in general, when this appearance does not correspond to gender norms.

The most serious manifestations of the behaviour listed may constitute a criminal offence punishable by serious penalties, including imprisonment, especially those that threaten sexual and physical freedom and integrity.



## Annex IV: Training

The training proposed in this protocol must include at least the following contents:

Type of training	Content
Basic for each Member of the Entity	<ul style="list-style-type: none"> <li>• Basic concepts of gender equality, sexual and gender diversity, and non-discrimination from an intersectional perspective.</li> <li>• Identifying biases.</li> <li>• What harassment is and what it is not.</li> <li>• How to identify risks and situations of harassment.</li> <li>• Best practices to prevent harassment.</li> <li>• The FC Barcelona Harassment Prevention Policy.</li> <li>• Information on the procedure defined in the protocol.</li> <li>• Information on external channels of protection and response (administrative and judicial).</li> </ul>
Basic training for players	<ul style="list-style-type: none"> <li>• Basic concepts of gender equality, sexual and gender diversity, and non-discrimination from an intersectional perspective.</li> <li>• Identifying biases, in particular in the sports area.</li> <li>• What harassment is and what it is not.</li> <li>• How to identify risks and situations of harassment, in particular in the sports area.</li> <li>• Best practices to prevent harassment, with special attention on the sports area.</li> <li>• The FC Barcelona Harassment Prevention Policy.</li> <li>• Information on the procedure defined in the protocol.</li> <li>• Information on external channels of protection and response (administrative and judicial).</li> </ul>
Specialised training for staff with management or supervisory responsibilities	<ul style="list-style-type: none"> <li>• The same as in the basic training for each Member of the Entity.</li> <li>• The role of managers and executives in determining the work culture.</li> <li>• The role of managers and executives in implementing the prevention policy: <ul style="list-style-type: none"> <li>— Identifying indicators.</li> </ul> </li> </ul>



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	<ul style="list-style-type: none"><li>— Actions to take.</li><li>— Practical tools.</li><li>• Work on key skills for action: communication and conflict management.</li><li>• Attention on diversity.</li></ul>
Specialised training for sports staff	<ul style="list-style-type: none"><li>• The same as in the basic training for players.</li><li>• The role of technical staff in determining the work culture.</li><li>• The role of technical staff in implementing the prevention policy:<ul style="list-style-type: none"><li>— Identifying indicators.</li><li>— Actions to take.</li><li>— Practical tools.</li></ul></li><li>• Work on key skills for action: communication and conflict management.</li><li>• Attention on diversity.</li></ul>
Specialised training for medical staff	<ul style="list-style-type: none"><li>• The same as in the basic training for players.</li><li>• The role of medical staff in implementing the prevention policy:<ul style="list-style-type: none"><li>— Identifying indicators.</li><li>— Actions to take.</li><li>— Practical tools.</li></ul></li><li>• Attention on diversity.</li></ul>
Specialised training for people with a specific role in addressing situations of harassment	<ul style="list-style-type: none"><li>• The same as in the specialised training for staff with management or supervisory responsibilities.</li><li>• Interview techniques, personalised support techniques, non-verbal communication techniques, and active listening.</li></ul>

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