

## Sexual Harassment Prevention Policy

### 1. Introduction

**OBRAS SUBTERRÁNEAS, S.A.** (hereinafter, OSSA) is committed to equality, dignity, and respect in the workplace.

Sexual harassment constitutes a violation of individuals' fundamental rights and undermines equality, dignity, and respect in both professional and social environments. This policy aims to prevent sexual harassment in the workplace and to ensure an environment free from all forms of discrimination, thereby promoting gender equality and protecting the rights of all employees.

### 2. Scope of Application

This Policy applies to all employees, managers, and members of the governing bodies of OSSA, and refers to both individual and collective actions carried out by or on behalf of the Company.

It applies to all companies within the OSSA Group, including subsidiaries and joint ventures (UTE) in which the Company holds a controlling interest.

This Policy covers all activities, processes, and relationships established by the Company and its employees, at all levels, whether formally documented through contracts, policies, procedures, or similar, or applied through custom or habitual practice.

### 3. Objectives

- Promote a respectful, inclusive, and harassment-free work environment.
- Define and establish clear procedures for the prevention, reporting, investigation, and sanctioning of sexual harassment.
- Ensure the protection of employees in cases of sexual harassment and prevent retaliation.
- Promote educational and awareness programs to prevent such behaviour.

### 4. Definition

Sexual harassment refers to any unwelcome behaviour of a sexual nature that affects the dignity of employees. It may manifest in the form of comments, innuendos, gestures, unwelcome physical contact, threats, or any conduct that creates an intimidating, hostile, or humiliating environment.

## 5. Preventive Measures

- Establishment of a clear code of conduct that prohibits sexual harassment " (available at [www.ossaint.com](http://www.ossaint.com)).
- Implementation of training and awareness programs on gender equality and sexual harassment prevention for all staff.
- Promotion of an organizational culture based on mutual respect and equity.
- Provision of safe and confidential channels for reporting incidents of sexual harassment.

## 6. Reporting and Resolution Procedures

### REPORTING COMPLAINTS

Complaints of sexual harassment may be submitted in writing through the channels established by the organization ([www.canaldedenuncias.com/es/ossa](http://www.canaldedenuncias.com/es/ossa)).

### INVESTIGATION

- Complaints will be investigated with impartiality and confidentiality.
- All parties involved will be given the opportunity to present their accounts of the events.
- Investigations will be conducted by personnel trained in gender equality and labor rights.

### SANCTIONS

Sanctions for acts of sexual harassment will vary depending on the severity of the case and may include warnings, suspension, or termination of employment, in accordance with applicable laws.

### PROTECTION AGAINST RETALIATION

It will be ensured that no one who files a complaint or participates in an investigation suffers retaliation. The organization will take measures to protect those affected.

### MONITORING AND EVALUATION

This policy will be reviewed periodically to ensure its effectiveness and alignment with current legal standards and organizational needs. The results of these evaluations will be communicated to staff to ensure transparency.

## 7. Management Commitment

The OSSA management reaffirms its commitment to promoting equality and respect in the workplace. The necessary resources will be allocated to ensure the effective implementation and continuous improvement of this policy.



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## 8. Conclusion

Preventing sexual harassment is a shared responsibility. Everyone in the organization plays a crucial role in fostering a work environment where the dignity and rights of all are respected. This policy not only reinforces our commitment to justice and equality but also reflects our core values as an institution.

**In San Sebastián de los Reyes (Spain), on June 19, 2025**  
**Mr. Carlos Puente Costales**  
**President**