

# **ZERO TOLERANCE FOR WORKPLACE DISRESPECT STANDARD**

**CORPORATE STANDARD**

*\*Standard approved by the Xcalibur Smart Mapping Board of Directors on November 20, 2024,  
and entered into force as soon as it was approved.*

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## Introduction

As part of its commitment to equality of opportunity, inclusion, and valuing diversity, as well as protecting health and safety, Xcalibur Smart Mapping is dedicated to promoting and ensuring a working environment where individuals are treated with respect. This commitment is clearly outlined in Xcalibur's Code of Conduct and Ethics and further reinforced by Xcalibur's Workplace Violence and Harassment Policy, upon which this Standard is built. We recognize that discrimination, harassment, bullying, victimization, and any form of violence not only undermine a productive working environment but also negatively impact the health, confidence, morale, and performance of those involved.

This Standard makes clear that all forms of work-related discrimination, harassment, bullying, violence, and victimization are unacceptable and will not be tolerated. At Xcalibur Smart Mapping, any complaints of such conduct will be addressed with the utmost seriousness and investigated without delay.

To facilitate your use of this policy, we would like to remind you that this document forms part of the company's Code of Conduct and Ethics, and Compliance Manual. Therefore, for any questions in this regard, please contact the Compliance Committee via [compliancecommittee@xcaliburmp.com](mailto:compliancecommittee@xcaliburmp.com).

## 1. Scope

- 1.1. This Standard applies to Xcalibur Multiphysics Group S.L., and its wholly owned or controlled (directly or indirectly) subsidiaries and joint ventures, ("Xcalibur Smart Mapping" or the "Company"). A "controlled" subsidiary or joint venture is a legal entity in which Xcalibur Multiphysics Group S.L. generally owns equity interests representing more than 50% of the voting shares.
- 1.2. This Standard applies to Xcalibur Smart Mapping Board and all directors, managers, supervisors, employees, job applicants, persons in training including interns, apprentices, and persons on learnerships; clients and customers, suppliers, contractors, and any other person having dealings with the Company.
- 1.3. The protection of Xcalibur's employees and stakeholders against discrimination, harassment, bullying, violence and victimisation applies in any situation in which the employee or stakeholder is working, or which is related to their work and/or which arises from their work

## 2. Operating definitions

For the purposes of this Standard the following definitions apply:

### 2.1 Discrimination

2.1.1. Discrimination takes place when an individual or a group of people are treated less favourably based on any of the following grounds: age; birth; civil, family, or career status; marital status; maternity or paternity status; pregnancy; descent, including caste; race, including ethnicity, and colour; migrant status; refugee or asylum status; minority status; indigenous origin; place of residence; language; religion or belief; political or other opinions; gender, gender identity, and gender expression; sex and sex characteristics; sexual orientation; disability; health status; genetic or other predisposition towards illness; economic status; property; social origin and social situation; work or occupation; or any other status.

### 2.2. Harassment

2.2.1. Harassment is any form of unwanted verbal, nonverbal or physical conduct related to protected characteristics (e.g. gender, religion, etc.) that undermines an individual's dignity and creates a hostile or intimidating work environment.

2.2.2. This conduct may be repetitive but can also occur as a single incident.

2.2.3. It is related to one or more of the grounds in terms of which discrimination is prohibited under international law<sup>1</sup>.

2.2.4. Harassment may include but is not limited to sexual harassment and racial, ethnic or social origin harassment.

2.2.5. It may be conducted in an open environment or a secretive manner, whether through direct face-to-face interactions or via communication technologies.

### 2.3. Bullying

2.3.1. Bullying is repeated and intentional behaviour aimed at intimidating, degrading, humiliating, or dominating another person or group, irrespective of any protected characteristics. It involves a pattern of behaviour that seeks to exert power and control over the victim.

2.3.2. Bullying does not need to relate to the grounds recognised under international law; it can be based on any characteristic or none at all.

2.3.3. Typically repetitive, creating a sustained hostile work environment.

2.3.4. Primarily psychological but can include physical actions meant to intimidate or degrade.

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<sup>1</sup> To know what constitutes protected characteristics, refer to the definition of discrimination provided above.

#### 2.4. Violence

- 2.4.1. Violence is any act of physical or emotional aggression including but not limited to physical assaults, threats of violence, verbal abuse, or actions that cause emotional trauma. It is characterized by its immediate and often severe impact on the victim.
- 2.4.2. Violence can occur as a single incident or a series of incidents. A one-time act of violence can still be classified as violence due to its immediate harmful impact.

#### 2.5. Victimization – related to exercising the right to speak up and upholding ethics

- 2.5.1. Victimization is when an individual is subjected to a detriment as they are denied opportunities to progress by their manager or a superior, because the individual previously took actions to assert their rights or the rights of others; or because the individual engaged in activities meant to uphold principles of ethical conduct.

## 3. Responsibilities

#### 3.1. The Company will endeavour to:

- 3.1.1. eliminate discrimination, harassment, bullying, violence and victimisation, and actively promote equality to foster a harmonious working environment;
- 3.1.2. take appropriate action and intervene early when aware of incidents of discrimination, harassment, bullying, violence or victimisation;
- 3.1.3. resolve incidents of discrimination, harassment, bullying, violence and victimisation in a sensitive, efficient, effective, and confidential manner; and
- 3.1.4. provide training to staff on issues related to discrimination, harassment, bullying, violence, and victimisation.

#### 3.2. Everyone in Xcalibur Smart Mapping should help to:

- 3.2.1. discourage discrimination, harassment, bullying, violence and victimisation by others by making it clear that such conduct is unacceptable, and supporting colleagues and peers who are taking steps to stop it;
- 3.2.2. understand what constitutes discrimination, harassment, bullying, violence and victimisation by attending training sessions and seeking advice from the Compliance Committee; and
- 3.2.3. bring to the attention of the Company any incident of workplace discrimination, harassment, bullying, violence or victimisation through the appropriate reporting channels, as outlined below. Reports should be made in good faith:

#### Options for reporting concerns:

- 3.2.3.1. Contact your supervisor if you feel comfortable doing so.
- 3.2.3.2. If you prefer not to speak to your supervisor, you can reach out to the Human Resources Department.

3.2.3.3. If you are concerned about potential retaliation and do not wish to contact your supervisor or HR, you can submit your concern via email to [whistleblower@xcaliburmp.com](mailto:whistleblower@xcaliburmp.com).

3.2.4. All line managers and others with positions of responsibility have an additional obligation to ensure that this Standard is implemented.

## 4. Protected reporting

4.1. The Company is committed to protecting from detriment those who raise concerns of discrimination, harassment, bullying, violence and victimisation, and to proceed in accordance with the whistleblowing procedures set out in the Company's Compliance Manual for impartially conducting internal investigations.

4.1.1. The Company guarantees that all complaints and incidents of discrimination, harassment, bullying, violence and victimisation are investigated and managed with the highest level of confidentiality and fairness, to the fullest extent possible. The Company is committed to protecting the identities of all parties involved, ensuring both procedural and substantive fairness throughout the process.

4.1.2. The determination of whether specific conduct constitutes discrimination, harassment, bullying, violence, or victimisation, as defined by this Standard, shall be based on the assessment of the Compliance Committee, following a thorough investigation of the case.

4.2. Non-employees who experience harassment, bullying or violence may report incidents to the perpetrator's supervisor or the Human Resources Department, if the alleged harassment, bullying or violence took place in the workplace or during the perpetrator's employment.

4.3. Employees subjected to harassment, bullying or violence by third parties, such as clients, customers, suppliers, or contractors, should promptly report such incidents to their supervisor or the Compliance Committee via email at [whistleblower@xcaliburmp.com](mailto:whistleblower@xcaliburmp.com).

## 5. Consequences of non-compliance

4.4. Harassment, bullying, violence and victimisation constitute gross misconduct.

4.4.1. Disciplinary actions following substantiated complaints will be proportionate to the severity of the harassment, bullying, violence or victimisation. Sanctions may include warnings, dismissal, and, if warranted by the circumstances, summary dismissal.

4.5. Disciplinary action may be pursued if allegations are determined to be malicious or vexatious. However, individuals lodging complaints will not face disciplinary action or any other detriment solely because their complaint is not upheld. Disciplinary action will only ensue if it is determined that the allegation is both false and made in bad faith (that is, without an honest belief in its truth).

- 4.6. This Standard does not prevent employees who have been assaulted from pursuing separate criminal or civil charges against alleged perpetrators or seeking a protection order.