

Madrid, 20th December 2019

Dear colleagues,

Yesterday, 19/12/2019, the lawsuit to challenge the collective dismissal was filed with the Audiencia Nacional.

This dismissal, in the end, affects 224 of us. The lawsuit is really extensive but these are the three main reasons why we challenge the collective dismissal:

1. Failure to comply with the causes alleged in the collective redundancy procedure.
2. Because the consultation period or the documentation provided for in Article 51.2 of the Spanish Working Statute has not been carried out:

- Failure to request a report from the workers' representatives - Lack of input from the external relocation plan.
- Final decision: on the final communication of the decision of the consultation period
- Position of the company during the consultation period.
- The company's position was uncompromising and unwavering - Refusal of the company to compensate the economic loss of the members of the commission for attending the meetings.
- Business conduct to impair the compensation calculation of the affected workers after they have been dismissed.
- Delivery of documentation in English.

3. Because the decision was taken with fraud, alone, bad faith, coercion and abuse of rights and in relation to the company's failure to comply with its obligation to negotiate in good faith:

- Individual communications to affected persons proposing exits to other companies of the group or unpaid leave
- Transfer of affected workers since the announcement on 8 August 2019 and during the consultation period
- Lack of consistency between the list of affected persons presented on 15 October and that presented on 30 October and the end of 14 November
- Regarding the company's performance with respect to the Girona Base.

All the formal failures and the fraud alleged could cause the declaration of nullity of the collective dismissal.

We are now waiting for a date to be set for the trial which can be attended by anyone who wishes to do so. We have a really strong battle ahead and we hope to be able to give this company the definitive lesson and that they comply with the law once and for all.

Stay united! Much encouragement and strength for all!