



CODE FOR PREVENTING AND COMBATING HARASSMENT AT WORK

CONTEXT

Harassment, as a behaviour that aims to intimidate or limit one or more people in a work context that has a harmful effect on the affected worker and consequently on the organisation where it occurs, must be avoided and legally sanctioned.

Harassment at work generates consequences at different levels, including manifestations of gender-based violence and violence in organisations, with an impact on the physical and mental health of the victim, reduced productivity and deterioration of the environment and quality of work.

Concern with preventing harassment (of a moral or “mobbing” or sexual nature) is therefore at a national level, having been materialised in the legislative amendment promoted by Law no. 73/2017, of 16 August (amendment no. 28/2017, of 02/10) which had the effect of strengthening the legislative framework for the prevention of harassment at work, namely establishing the duty of the employer to adopt codes of conduct to prevent and combat harassment at work.

In accordance with the values of FHC Group contained in its *Code of Conduct and Compliance Policy*¹, discrimination will not be tolerated for any reasons such as race, colour, gender, age, religion, nationality, ancestry, ethnicity, disability, sexual orientation, gender identity, gender expression, genetic information, citizenship status, marital status, military status or condition or any other characteristic protected by applicable law. FHC Group adopts and encourages its business partners to adopt Harassment Prevention Codes at Work.

All employees of FHC Group must benefit from a work environment free from moral and sexual harassment, with protection being guaranteed against acts of retaliation in case of reporting non-compliant practices, in accordance with the *Infraction Reporting Regulation (Whistleblowing)*² of the Group.

Consequently, FHC Group has the firm desire to prevent the occurrence of all types of harassment, and if it does occur, ensure the effective application of appropriate measures to prevent its recurrence.

Therefore, and in compliance with the provisions of the current legal framework, in accordance with the above-mentioned documents and which bind FHC Group and its employees, this document aims to define the code for preventing and combating harassment at work.

¹ [Code of Conduct and Compliance Policy](#)

² [Infraction Reporting Regulation \(Whistleblowing\)](#)

REPORTING/ COMMUNICATION CHANNEL

Anyone covered by this code of conduct must report any incident of harassment that they have experienced or witnessed.

Any person covered by this code may ask **questions or report** situations that may reasonably fall within the definition of harassment contained in this code via the **specific email address provided by the Company for this purpose and widely disseminated on the Employee Portal: assedio.nao@groupfhc.pt**.

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CHAPTER I INTRODUCTORY PROVISIONS

ARTICLE 1 OBJECT

This Code for Preventing and Combating Harassment at Work establishes a set of principles and standards that must be observed when developing activities carried out in FHC Group, constituting a self-regulatory instrument in order to prevent, combat and sanction situations and behaviours that are susceptible to consubstantiate harassment at work.

ARTICLE 2 SCOPE OF APPLICATION

1. This Code applies to:

- a. All people, natural or legal, who maintain professional, commercial or other relationships with FHC Group, even if temporary;
- b. All employees, interns and collaborators of FHC Group, regardless of their hierarchical position, including members of governing bodies and managers as well as service providers.
- c. All relationships within the scope of the activity of the company, whether carried out during normal working hours or outside of these, at headquarters or another facility, or on business trips.
- d. Relationships within the scope of the activity of the company, whether carried out in person or through information and communication technologies.

2. The application of this Code and its observance does not prevent or exempt the application of other regulations, as well as other rules of an ethical nature and applicable Codes of Conduct, Regulations, Standards and Internal Newsletters.

3. This Code is mandatory for all employment relationships or relationships of provision of services, regardless of whether they occur in the workplace or outside of it.

ARTICLE 3

COMMITMENT

1. FHC Group has a policy of zero tolerance to harassment at work.
2. All employees benefit from a work environment free from moral and sexual harassment and any associated retaliation.
3. When carrying out their activities, functions and responsibilities, Employees must act bearing in mind the pursuit of interests of the employer, safeguarding the principles of equity and non-discrimination, human dignity and combating harassment at work, promoting relationships of respect, trust, loyalty, good faith, mutual assistance and solidarity in the work context.
4. Employees must refrain from discriminatory behaviour towards others or third parties, whether or not they are recipients of services or activities, particularly based on race, gender, age, physical disability, sexual orientation, opinions, political ideology and religion.
5. Any practice contrary to the principles contained in this code is subject to legally foreseen sanctions.

ARTICLE 4

DEFINITION OF HARASSMENT

1. Harassment is understood as the practice of unwanted behaviour, carried out in one's own employment, when accessing it, at work or professional training, with the aim or effect of disturbing or embarrassing the person, affecting their dignity or creating an intimidating, hostile, degrading, humiliating or destabilising environment and may be of a moral or sexual nature.
2. Moral harassment consists of verbal or non-verbal attacks with an offensive or humiliating content, and physical attacks, which may include physical and/or psychological violence in a clear or covert manner.
3. Harassment is sexual when it involves unwanted behaviour of a sexual nature or other behaviours based on sex or with a sexual connotation that affect the dignity of women and men at work, and may include any other unwanted behaviour in verbal, non-verbal or physical form.

ARTICLE 5

PROHIBITED PRACTICES

1. Harassment at work is prohibited, regardless of its author, character and the means through which it occurs.
2. In particular, the following behaviours, among others, which may constitute harassment are prohibited:
 - a. Any form of intimidation, physical or psychological, to the detriment of the freedom and privacy of the Employee;
 - b. Threats of any kind, expressed or implied;
 - c. Verbal and/or physical attacks, including repeated comments of a degrading nature, offensive to the dignity of the Employee;
 - d. Explicit comments about physical appearance;
 - e. Any other conduct or behaviour that fits into a context of deterioration of the physical and mental integrity of the employee;
 - f. Unwanted behaviour of a sexual nature, in verbal, non-verbal or physical form, with the objective or effect referred to in number 1 of article 4;
 - g. Retaliatory action against an Employee who has reported harassment or who has attended or participated in an investigation, process or procedure related to harassment in the company.

CHAPTER II

INTERNAL PROCEDURE

ARTICLE 6

REPORT

1. Any person covered by this Code who believes that they have been subjected to harassment at work, or witnessed similar practices in the same context, must report the harassment incident, whether they are the target or a witness.
2. Reporters of harassment incidents are specially protected by FHC Group in relation to forms or attempts of retaliation or discriminatory or disciplinary action, and the protection guarantees provided for in the Infraction Reporting Regulation (Whistleblowing) of FHC Group are directly applicable to them, in accordance with Law No. 93/2021, of 20 December.
3. Employees who consider themselves to be the target of harassment at work or who are aware of irregular practices that could indicate situations of harassment at work must report the situation to their hierarchical superior, the department head or the General Manager and/or administrator and must provide due collaboration in the disciplinary process that takes place.
4. If it is not possible, for any reason, to comply with the provisions of the previous number, the employee must report the incident to the management of Capital Humano.
5. In any case, the employee may choose to use the reporting channel via the email address created for this purpose and made available by the Company and disseminated on the Employee Portal, as provided for in no. 3 of article 7 of this Code.
6. The recipient of the report referred to in the previous numbers must forward it to comply with the procedures best described in article 8 of this Code.
7. Retaliation due to a report made under the terms of this article and subsequent articles will be subject to disciplinary action.

ARTICLE 7

FORM, CONTENT AND MEANS OF MAKING THE REPORT

1. The report or complaint must contain a description of the facts, identifying the circumstances, time and place, identity of the victim and the harasser.
2. The report must be in writing.
3. Reports or complaints regarding situations of harassment at work can be sent to the email address created for this purpose – [**assedio.nao@groupfhc.pt**](mailto:assedio.nao@groupfhc.pt)

CHAPTER III

SANCTIONARY SYSTEMS

ARTICLE 8

PROCEDURES

1. Whenever FHC Group, represented by those responsible, becomes aware of a violation of the provisions contained in this Code, it will initiate a prior investigation procedure.
2. The investigation procedure and respective disciplinary procedure, if applicable, will be carried out by the team of instructors responsible for implementing the workplace harassment prevention policy, appointed by the Board of Directors of FHC Group.
3. Confidentiality is guaranteed for all people involved.
4. Employees and administrators of FHC Group may not disclose or make known information obtained in the performance of their duties or as a result of such performance, even after their termination, unless such information has already been authorised or can be made public, under the law.
5. Swift processing of procedures initiated following reports of harassment at work is guaranteed.
6. The practice of harassment constitutes a very serious offense, without prejudice to any civil and criminal liability provided for by law.

ARTICLE 9

SANCTIONS

1. Employees involved in behaviour prohibited by this Code, as well as those who make reports in bad faith, will be subject to disciplinary action.
2. Recurrence of abusive behaviour by an employee or collaborator towards the same or another victim may result in the immediate termination of the employment contract following the legally established disciplinary procedure.
3. Any form of retaliation or coercion recorded during the investigation process greatly worsens any applicable sanctions.

CHAPTER IV

HARASSMENT PREVENTION

ARTICLE 10

PREVENTIVE MEASURES

It is the responsibility of the Administration, or to whomever it delegates the responsibility, to implement concrete actions to prevent harassment at work, namely:

- a. Regular consultation with employees from all departments and units;
- b. Regular consultation with Department Heads and Service Directors;
- c. Verify and ensure the existence of internal mechanisms for reporting irregularities, ensuring that they comply with legal standards, particularly in terms of confidentiality and anonymity of reporters;
- d. Promote information and training on harassment and conflict management at work for all employees of the Group;
- e. Proceed with the dissemination of this Code to all employees and holders of management positions, by posting it in the workplace and making it available on the Employee Portal;
- f. Designate a team responsible for handling the reports provided for in this Code of Conduct, with specific training aimed at monitoring and evaluating the effective resolution of each reported incident;
- g. Appoint the manager of the reporting channel;
- h. Include a declaration of knowledge and acceptance of the rules in force in this Code in the process of admission of employees.

ARTICLE 11

REVIEW

This Code must be periodically reviewed, whenever new facts arise that justify its review.

ARTICLE 12

ENTRY INTO FORCE

This Code of Conduct comes into force on December 5, 2023, and will be made available for consultation by Employees on the same date.