



Code of conduct for prevention and combat against harassment at work



Objectives

- 1.** NOS, through its Code of Ethics, assumed a set of fundamental ethical principles for responsible performance in the market and in society.
- 2.** In this context, NOS is committed to basing its human resources management policy on respect for diversity, the rights of each person and non-discrimination.
- 3.** NOS thus undertakes not to condone any form of harassment or any other form of attack on the dignity of its employees or the people with whom they relate, whenever the harassing behaviour is practiced by employees or members of corporate bodies of NOS Group companies.
- 4.** The Code of Conduct for the Prevention and Combat of Harassment at Work develops and deepens this commitment, bringing together and making known a set of principles and rules that aim to prevent and, if necessary, combat harassment behaviour or any other form of attack on dignity of the employees or people with whom they relate.

Who it applies to?

- 5.** The Code of Conduct for the Prevention and Combat of Harassment at Work is applicable to all members of the corporate bodies and employees of the NOS Group companies ("Employees"), who must comply with the principles and rules described therein and collaborate in the prevention and repudiation of harassment behaviours, in whatever form they take, the cause that determines them or whoever their author.
- 6.** This Code of Conduct is disclosed to all Employees and is published on the intranet.

What is harassment

- 7.** Harassment can be of a moral or sexual nature and be practiced when accessing work, at work itself or outside it, as long as there is a connection with it.
- 8.** Psychological harassment is the repeated or persistent set of acts or behaviours adopted with the aim or effect of disturbing or embarrassing the person, affecting his dignity, or creating an intimidating, hostile, degrading, humiliating or destabilizing environment.
- 9.** Psychological harassment may - or may not - have its origin in some form of discrimination, namely because of gender, sexual orientation, age, religion, ethnic or race origin, nationality, language, education, family or economic status, origin or social status, reduced work capability, disability, chronic illness, political or ideological beliefs and union or other affiliation.
- 10.** Sexual harassment is unwanted sexual behaviour, in verbal, non-verbal or physical form, with the aim or effect of embarrassment, intimidation or humiliation mentioned above.
- 11.** The behaviour or conduct that corresponds to the legitimate exercise, by the employer, of the powers that are legally conferred to it - namely the management, hierarchical and disciplinary powers - does not constitute harassment.
- 12.** Harassing behaviour can originate from any professional, whether he is a member of the NOS corporate body, a hierarchical superior or a colleague, and must be reported and appreciated regardless of their authorship.



Procedure

- 13.** Anyone who considers to have been a victim of harassment at work or anyone who has witnessed any behaviour in this regard, should report the situation to their manager, the People and Organization Director or the NOS Ethics Committee, via email **comunicar.irregularidades@nos.pt**.
- 14.** The Manager or the People and Organization Director, when receiving the information referred to in the previous number, must report in writing to the Ethics Committee the harassment situation that was reported to him.
- 15.** The Ethics Committee is responsible for carrying out the appropriate investigation steps to determine the reported harassment situation.
- 16.** When gathered evidence revealing the practice of harassment, the ethics committee gives notice of the situation in writing to the Executive Committee, for determining and promoting eventual disciplinary liability.
- 17.** The Ethics Committee and the Executive Committee must promote or adopt appropriate measures to prevent conduct of an identical nature.
- 18.** The victim of harassment who has reported behaviour with these characteristics under the terms provided for in this Code of Conduct has the right to know the final decision made by NOS on the facts.
- 19.** The procedure described in the previous numbers applies to the reporting of harassment situations when practiced by or on NOS Group Employees, belonging to the Ethics Committee and the Executive Committee, the obligations and powers set forth therein.

NOS Commitment

- Be attentive and vigilant and combat any behaviour that may constitute harassment, under the terms set out in this Code of Conduct;
- Ensure that reporting harassment does not provoke retaliation;
- Act swiftly in investigating complaints or reports of harassment behaviour;
- Treat equitably and appropriately those who report and are reported for harassing behaviour;
- Maintain secrecy and do not disclose to third parties, except to the strict extent necessary to comply with an order of public authority, judicial duty or burden or reporting obligation provided for in this Code of Conduct, the information collected during the investigation of harassment situations reported under the terms indicated in the previous numbers;
- Maintain secrecy about the identity of the victim of harassment, whenever requested;
- Exercise disciplinary power in order to adequately punish those who have proven to have engaged in harassment;
- Periodically review the policies in force at the Company, namely the rules provided for in this Code of Conduct, in order to increase the effectiveness of preventing and suppressing harassment situations.