

PREVENTION OF HARASSMENT AT WORK

CODE OF CONDUCT

ARTICLE 1

General principles of conduct

1.1. Employees of Sanitana, whether working internally or representing the company externally, must act in accordance with the principles and ethical values upheld by Sanitana by adopting behaviour based on responsibility, diligence and the utmost respect for the dignity and rights of people.

1.2. Sanitana encourages mutual respect and cooperation among all employees, in a respectful and decent working environment, and therefore no acts of harassment whatsoever will be tolerated or allowed.

ARTICLE 2

Harassment

2.1. Harassment consists of *“undesirable behaviour, namely on the basis of a discriminatory factor, practiced when applying for employment or in the actual job, work or vocational training, with the aim or effect of annoying or embarrassing the person, affecting their dignity or creating an intimidating, hostile, demeaning, humiliating or destabilising environment for them”*.

ARTICLE 3

Forms of Harassment

3.1. Discriminatory harassment consists of undesirable and hostile behaviour based on a discriminatory aspect, such as race, religion, sexual orientation or others.

3.2. Non-discriminatory harassment or *mobbing* consists of undesirable behaviour that while not based on a discriminatory aspect, is constant and reiterated, thus producing the same effects, and has the objective of forcing the worker out of the company.

3.3. Sexual harassment consists of *“undesirable behaviour of a sexual nature in a verbal, non-verbal or physical form”* with the objective or effect of annoying or embarrassing the person, affecting their dignity or creating an intimidating, hostile, demeaning, humiliating or destabilising environment for them”.

ARTICLE 4

Obligations of the workers and employer and their representatives

4.1. Any worker, employer and their representative, who witnesses an act of any form of harassment has the duty to report it to their superior, their employer or the latter's representative.

4.2. The employer, their representative or the manager to whom the act of any form of harassment was reported has the duty to instigate disciplinary proceedings or ensure that they are instigated against the perpetrator.

ARTICLE 5

Rights of whistle-blowers and/or witnesses to an act of harassment

5.1. Unless acting with malice, whistle-blowers and witnesses to the act of any form of harassment cannot be subject to disciplinary proceedings based on declarations or facts contained in the judicial or administrative offence case files, until a final verdict has been reached, notwithstanding exercising the right to adversarial proceedings.

5.2. Dismissal or another sanction applied allegedly to punish an offence shall be considered abusive when it takes place up to one year after reporting any form of harassment.

ARTICLE 6

Rights of the victims of harassment

6.1. Practice of any form of harassment shall give the victim the right to compensation for damage to property and for personal injury.

6.2. Harassment, in any of its forms, constitutes a just cause for terminating the employment contract with the right to compensation.

6.3. The worker shall have the right to compensation for all and any damages arising from an occupational disease resulting from any form of harassment.

ARTICLE 7

Procedure in the case of alleged harassment

7.1. In the case of an incident of harassment, which shall not be tolerated, the procedure to be carried out internally is based on the following principles:

- a)** The interest of all parties in acting with necessary discretion to protect each one's dignity and privacy;
- b)** Non-disclosure of any information to other parties not involved in the incident;
- c)** Complaints must be investigated and handled swiftly;
- d)** All parties involved must be heard impartially and benefit from fair treatment;
- e)** Complaints must be justified through detailed information;
- f)** Should the occurrence of harassment be proven, appropriate measures will be taken against the perpetrator(s), which may encompass disciplinary sanctions, including dismissal;

7.2. The *Autoridade para as Condições do Trabalho* (Portuguese Authority for Working Conditions) and the *Inspeção-Geral de Finanças* (Portuguese Audit Authority) provide specific email addresses for receiving complaints of labour-related harassment in the private and public sectors, respectively, and information on their respective websites for identifying harassment practices and on measures for preventing, combating and reacting to instances of harassment.

ARTICLE 8
Formal Procedure

8.1. Whenever possible, every situation brought to light should be corrected without going through all the formality of disciplinary proceedings. Sometimes, a person may not realise that their behaviour is inappropriate and that their direct approach may be misconstrued.

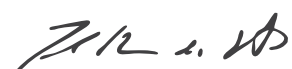
8.2. In such cases, if they deem fit, the participants may use this approach, communicating and requesting the support of their line manager, or another person in their hierarchical structure, or even another employee in the organisation.

8.3. In the case of alleged harassment, the person should present, in writing, all the circumstantial evidence to their knowledge involving the situation. Once disciplinary proceedings have been started, notwithstanding the rules set out in the Portuguese Labour Code, they will comply with the following:

- a)** The worker must present their complaint in writing, in as much detail as possible, to the Human Resources Department, either by email or in person, Sanitana being responsible for receiving all complaints of harassment at work;
- b)** The Human Resources Department shall carry out an investigation into the complaints it receives, for which it must have at its disposal the necessary means and information that might be related to the case, for which all employees are obliged to cooperate;
- c)** The Human Resources Department, in cooperation with legal affairs, shall draw up a report with conclusions, which shall include the facts and their legal framework, indicating, if possible, aggravating or mitigating circumstances, and propose the disciplinary sanctions to be applied and preventive measures to be adopted.

Reports, infringements, suggestions or any other comment related to this document can be communicated using the following channels:

- **Email:** rh.geral@sanitana.pt
- **Postal address:** Sanitana S.A. - Apartado 45 - 3781-909 Anadia
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