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Good Conduct Policy for Preventing and Combating Workplace Harassment



TAPGROUP



Good Conduct Policy for Preventing and Combating Workplace Harassment



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01. Introduction

Moral and sexual harassment are very serious wrongdoing and improper behaviour that can seriously impact the physical and mental health of victims and their families. In general, these issues destabilize the work environment, decrease psychological safety, generating conflicts that lead to major drops in innovation and productivity.

It is well known that moral and sexual harassment are closely linked to unequal access to resources, power and prestige. The hierarchical nature of the labour world also contributes, to a large extent, to harassment practices, through expressions of abusive use of power.

The Portuguese Labour Code¹ prohibits “the practice of harassment” in any of its possible forms, including sexual harassment.

In 2017², new rules were introduced to reinforce the prevention and combat of harassment, namely the rule that requires companies with seven or more employees to adopt codes of conduct aimed at this purpose.

Aware of this reality, the TAP Group considers the dignity and physical and mental well-being of its Employees to be one of its primary values, rejecting any behaviour that goes against them. Likewise, the TAP Group is absolutely committed to developing measures aimed at maximizing the accomplishment of these values of dignity and well-being, especially with regard to the most vulnerable Employees.

Thus, this Good Conduct Policy for Preventing and Combating Workplace Harassment (hereinafter, the “Policy”) defines the internal rules aimed at preventing and combating moral and sexual harassment practices within TAP Group Companies, contributing for its organizational environment to be recognized as safeguarding the moral integrity of its Employees, and as safeguarding their right to working conditions that respect their individual dignity.

With the publication and enforcement of this Policy, the TAP Group demonstrates its commitment to strengthening its corporate culture by promoting an organizational environment free from moral and sexual harassment practices³.

¹ Article 29 of the Portuguese Labour Code.

² Law No. 73/2017, of August 16.

³ Furthermore, with the publication and execution of this Policy, the TAP Group demonstrates compliance with the obligation arising from Article 127.1, sub-paragraphs k) and l) of the Portuguese Labour Code, approved by Law No. 7/2009, of February 12, in its current wording.

02. Purpose

The purpose of this Policy is to identify behaviours that may constitute moral and sexual harassment at work, and to define measures to prevent and combat such issues.

03. Scope

3.1 This Policy applies to all Employees, understanding as such, the members of management or supervisory bodies, employees, service providers, attorneys and consultants, belonging to the Group organization, regardless of the nature or form of their legal relationship (hereinafter "Employee" or "Employees") with TAP Group Companies, namely Siavilo – SGPS, S.A., Transportes Aéreos Portugueses, S. A. ("TAP, S. A."), Portugal – Companhia Portuguesa de Transportes Aéreos, S. A. ("PGA"), TAPGER – Sociedade de Gestão e Serviços, S.A. ("TAPGER"), UCS – Cuidados Integrados de Saúde, S. A. ("UCS"), and TAP Logistics Solutions, S. A. ("TAP Logistics") (hereinafter, "Company," collectively referred to as "TAP Group").

3.2 The provisions of this Policy apply to all relationships established within the scope of the activity of all TAP Group Companies, within or outside working hours, at their head offices or elsewhere, either in person or through information and communication technologies.

04. Sexual Harassment⁴

Sexual harassment is unwanted behaviour, perceived as abusive, of a sexual nature, either in verbal, non-verbal or physical form, which may include attempted disturbing physical contact, request for sexual favours with the aim or effect of disturbing or embarrassing the person, affecting their dignity, creating an intimidating, hostile, degrading, humiliating or destabilizing environment, obtaining advantages, blackmail, and even the use of force or a strategy of coercing the other person's will. It is generally a repeated behaviour, and may also happen once only, and of an explicit, threatening nature.

Sexual harassment has four dimensions, including, but not limited to, the behaviours listed below:

Sexual undertone

- Jokes or remarks about someone's appearance that offended her/him
- Offensive jokes or remarks about someone's body
- Offensive jokes or remarks of a sexual nature

Unwanted sexual attention

- Invitations for unwanted meetings
- Explicit, unwanted proposals of a sexual nature
- Unwanted proposals of a sexual nature via email, SMS or through websites and social networks
- Offensive phone calls, letters, SMSs, emails or images of a sexual nature
- Ingratiating glances
- Intrusive and offensive questions about one's private life

Physical contact and sexual assault

- Unwanted physical contact (touching, grasping, grabbing, groping, kissing or trying to kiss)
- Sexual assault or attempted sexual assault

Grooming

- Requests for sexual favours associated with promises of getting a job or of improving someone's working conditions

⁴ Source: Guide for developing a code of good conduct to prevent and combat workplace harassment, available in [Other publications - CITE](#).

05. Moral Harassment⁵

Moral harassment is unwanted behaviour, perceived as abusive, carried out persistently and repeatedly, and may consist of a verbal attack with offensive or humiliating content or subtle acts, which may include psychological or physical violence. Its purpose or effect is to lower the self-esteem of the targeted person(s) and, ultimately, to jeopardize his/her(their) connection to the workplace. Victims are involved in situations in which they generally find it difficult to defend themselves.

Just like sexual harassment, moral harassment can have four dimensions, including, but not limited to, the behaviours listed below:

Social isolation

- Promoting someone's isolation or lack of contact with colleagues
- Promoting someone's isolation or lack of contact with managers

Professional harassment

- Setting impossible-to-achieve goals
- Systematic devaluation of someone's work
- Inadequate responsibilities

Bullying

- Systematic threats of dismissal
- Being the target of stressful situations with the aim of causing loss of control

Personal humiliation

- Being humiliated due to physical, psychological or other characteristics

⁵ Source: Guide for developing a code of good conduct to prevent and combat workplace harassment, available in [Other publications -CITE](#).



06. TAP Group Commitments

The TAP Group has a **zero tolerance policy towards sexual and moral harassment**, understanding that any form of harassment infringes its Employees rights, harms working relationships, and compromises the mission of TAP Group Companies. Thus, the TAP Group undertakes to:

- I) Ensure compliance with the TAP Group Code of Ethics and Conduct, and this Policy;
- II) Not tolerate any behaviour that qualifies as workplace harassment by Employees, towards colleagues, customers, suppliers, partners or anyone with whom they interact;
- III) Ensure respect for the principle of equality, making sure that all Employees have the right to equal opportunities and treatment, not favouring, benefiting, harming, depriving anyone of any right or exempting anyone from any duty due to his/her background, sex, gender, skin colour, language, territory of origin, religion, political or ideological beliefs, education, economic situation, social condition or sexual orientation or any other reason not related to merit and professional performance;
- IV) Identify hazards and assess psychosocial risks in the workplace;
- V) Ensure that all reports of situations that could be considered as harassment are dealt with in a confidential manner and expeditiously, protecting the whistleblower in good faith from any type of retaliation;
- VI) Ensure that people involved in harassment cases are treated with respect and dignity;
- VII) Disseminate this Policy, namely through training and awareness-raising initiatives on the topics of preventing and combating workplace harassment.

07. Standard of Conduct

7.1 TAP Group Employees are responsible for preventing the occurrence of workplace harassment, and shall, in particular:

- a) Treat all colleagues with respect and courtesy, refraining from using derogatory language, or verbal, physical or psychological harassment;
- b) Take part in training and awareness-raising initiatives promoted by the Company on the topic of preventing and combating workplace harassment;
- c) Report situations of harassment at work.

7.2 TAP Group Employees shall not, in particular:

- a) Devalue the work of colleagues;
- b) Mock, either directly or indirectly, about a physical or psychological feature of colleagues;
- c) Spread rumours and malicious remarks about colleagues;
- d) Display intimidating behaviour towards colleagues.

7.3 All TAP Group Employees involved (namely, whistleblowers, witnesses, managers of the Whistleblowing Channel and instructors of investigation cases) shall act with the necessary discretion to protect everyone's dignity and privacy, not disclosing information to other parties not involved in the incident, without prejudice to the initiatives provided for by law, by this Policy, and by the Whistleblowing Channel Policy.



08. Reporting Workplace Harassment

8.1 Whenever an Employee considers him/herself a target or suspects or is aware that a colleague is involved in any conduct that could constitute moral or sexual workplace harassment, he or she must immediately report it through the TAP Group Whistleblowing Channel Transportes Aéreos Portugueses, S.A.: <https://channel.whistleon.com/tapairportugal>

Whistleblowing Channel Portugalía – Companhia Portuguesa de Transportes Aéreos, S.A.: <https://channel.whistleon.com/portugalia>

Whistleblowing Channel UCS – Cuidados Integrados de Saúde, S.A.: <https://channel.whistleon.com/ucs>

8.2 Reporting shall follow the rules defined in the Whistleblowing Channel Policy.

8.3 Complaints regarding situations of moral or sexual workplace harassment will be forwarded for analysis and investigation by a Multidisciplinary Team including (i) the Director of Legal Compliance, who will coordinate the Team, (ii) a doctor/Psychologist to be appointed by UCS, within two working days, counting from the date the complaint became known, and (ii) by at least one more of the following persons:

- The Director of the Internal Audit Department;
- The Director of the Negotiations and Labour Relations Department;
- The Director of the Human Resources Department.

8.4 The Directors mentioned above may delegate their duties to a senior member of their team.

8.5 Receipt of a complaint containing description of facts that may constitute a situation of harassment, determines initiating disciplinary proceedings or, if there are insufficient details, a prior investigation procedure, which may result in:

- a) Deciding to file the prior investigation procedure due to insufficient reasons and/or evidence;
- b) Taking internal measures considered appropriate in view of the situation reported; or
- c) Deciding to initiate disciplinary proceedings.

8.6 In addition to the internal complaint, the whistleblower may, if the conduct constitutes a crime or an administrative offence, file an external complaint with the police authorities or with the Public Prosecutor's Office, with the Working Conditions Authority, or the Commission for Equality in Labour and Employment (CITE).

09. Guarantees of the Complaint Investigation Procedure

9.1 In the context of complaints made regarding workplace harassment, the TAP Group shall guarantee:

- a) That the complaint can be submitted anonymously, in which case the protection enshrined in the whistleblower protection legislation shall be constantly upheld;
- b) That, in case the whistleblower wishes to provide personal information, such as his/her name or other contact details, in order to facilitate the investigation of the situation or the implementation of action plans, the confidentiality of such information shall always be ensured;
- c) That the person reported will benefit from the presumption of innocence until the conclusion of the prior investigation procedure and/or of the disciplinary proceedings;
- d) Total protection against any form of retaliation against the person who, in good faith, filed a report or against witnesses to the conduct reported, in accordance with Section 11 of this Policy;
- e) That it will trigger disciplinary proceedings against those reporting in bad faith, i. e., reporting any conduct that the whistleblower know is not true;
- f) That all investigations will follow due process, and will be conducted efficiently, regardless of those targeted in the reported suspicion;
- g) That the whistleblower will be kept informed about the measures implemented and their respective reasons, as defined in the Whistleblowing Channel Policy.

9.2 The guarantees referred to in the previous paragraph shall also apply to requests for support made to direct management.

10. Non-Compliance

10.1 The practice of harassment can be considered a crime, a very serious labour offence, and a disciplinary infraction, punishable under the terms of the Law, and entitles victims to compensation for material and non-material damage, under the general terms of law.

10.2 Employees who engage in conduct considered as workplace harassment are subject to disciplinary action, which may result in their dismissal.

10.3 Engaging in or attempting to engage in sexual or moral harassment of Employees by suppliers or other third parties may result in the termination of the respective contracts signed with TAP Group Companies.

11. Protection of Whistleblowers and Witnesses

11.1 Employees who report infringements of this Policy of which they become aware of in the course of carrying out their duties or because of such duties, cannot be harmed in any way.

11.2 Whistleblowers and witnesses shall not be subject to disciplinary sanctions, unless they act with malice, based on statements or facts contained in the case records, whether judicial or administrative, triggered by harassment until a final decision, final and unappealable, notwithstanding the right to adversarial proceedings.

11.3 Dismissal or other sanctions applied, allegedly to punish an infraction, is presumed abusive when it takes place up to one year after the complaint or other form of exercise of rights relating to equality, non-discrimination and harassment.

11.4 Any form of retaliation against the victim or a witness to conduct that could constitute harassment that occurred after a complaint was submitted will also be subject to disciplinary proceedings, and may worsen any sanctions applied to the reported conduct.

12. Publication, Publicity, and Training

- 12.1 This Policy will be published on the Intranet and on the official websites of the TAP Group Companies.
- 12.2 This Policy shall be made available to third parties who represent the TAP Group or who establish contractual relationships with any of the TAP Group Companies.
- 12.3 As part of its training and communication plans, the TAP Group shall include mandatory training initiatives for all Employees on this Policy, as well as communication actions to raise awareness on topics related to preventing and combating workplace harassment, the frequency of which will be mandatory to all Employees.

13. Approval and Validity

- 13.1 This Policy will become valid after approval by the Boards of Directors of the TAP Group Companies.
- 13.2 This Policy comes into force and is applicable, producing full effects, after its publication date.





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History of Changes:

Version

(Date of approval by the Board of Director
of TAP, S. A.)

Date

01

21.05.2024

1.1

01.02.2025