

POLÍTICA PARA
PREVENÇÃO E COMBATE AO **ASSÉDIO** NO TRABALHO



(Policy for the Prevention of and Fight against Harassment in the Workplace)

With regard to the pursuit of the Principles of Equality and Non-Discrimination, as advocated by the IP Group Code of Ethics, the Policy for the Prevention and Fight against Harassment in the Workplace, approved by the Executive Board of Directors of Infraestruturas de Portugal S.A., complies with obligations arising from Article 127(1)(k) of the Labor Code approved by Law No 7/2009 of 12 February 2009, in its current wording.

This Policy reflects the recognition by the top management of the importance of promoting measures related to the well-being of employees in order to achieve the organizational development sought for the companies Infraestruturas de Portugal, S.A., IP Engenharia, S.A., IP Património, S.A., IP TELECOM, S.A. and GIL, S.A., all hereinafter referred to as the IP Group.

1. SCOPE

- 1.1. This policy applies to all IP Group staff regardless of the type of contract or the position they occupy within the organization, including, managers and the members of corporate bodies of IP Group companies.
- 1.2. Whenever the representatives, service providers or suppliers of the IP Group act on behalf of IP Group companies, they are required to respect the principles and ethical values set out in this policy.

2. SUBJECT MATTER

The aim of this policy is to identify behavior liable to constitute workplace harassment and to define measures to prevent and combat such behavior.

3. DEFINITIONS ¹

III HARASSMENT IN THE WORK PLACE

Harassment is inappropriate behavior, more specifically, behavior which is discriminatory in nature at the point of access to employment or during work or professional training with the aim or effect of disturbing or making a person uncomfortable, affecting a person's dignity or which creates an intimidatory, hostile, degrading, humiliating or destabilizing environment.

III MORAL HARASSMENT

Harassment is moral when it consists of verbal attacks of offensive or humiliating content, or physical, or more subtle actions, which may include physical and/or psychological violence, seeking to reduce the victim's self-esteem and, ultimately, their departure from the workplace.

III SEXUAL HARASSMENT

Harassment is sexual when it consists of unwanted sexual behavior, in verbal, non-verbal or physical forms, with the aim or effect of disturbing or embarrassing the person, affecting their dignity, or creating an intimidating, hostile, degrading, humiliating or destabilizing environment.

¹ Sources: Labor Code and "Information Guide for the Prevention and Fight against Harassment in the Workplace: An instrument to support self-regulation, issued by the Committee for Equality at Work and in Employment (CITE)", available at http://cite.gov.pt/pt/destaques/complementosDestqs/guia_informativo.pdf

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4. CHARACTERIZATION OF HARASSMENT ²

4.1. Without prejudice to other aspects indicative of harassment, such behavior is characterized by:

- a) repetition - harassment takes the form of repeated acts / behaviors;
- b) intentionality - acts/behaviors are directed at a victim with the intention of affecting their dignity and damaging their moral and/or physical integrity, and may lead to the victim having reduced ability to resist or rebuff a situation that they do not wish to be in, placing them in a position of embarrassment, submission, or weakness;
- c) taking advantage of a weakness - harassment may involve taking advantage of a victim's weakness or their professional/hierarchical position.

4.2. The following situations do not constitute harassment:

- a) decisions made by superiors which are grounded in the rules of the organization of work and the employment contract;
- b) the legitimate exercising of hierarchical or disciplinary power (e.g., performance assessment, disciplinary procedure, etc.);
- c) the pressure resulting from the normal performance of duties.

5. IP GROUP COMMITMENT

The IP Group pledges to:

- a) disseminate and develop this Policy by creating other supporting documents and materials that contribute to improving behavior and reducing risk factors;
- b) promote training and awareness-raising actions on the topics of preventing and combating harassment at work;
- c) assess and manage psychosocial risks;
- d) provide support to employees who are victims of harassment in the workplace;
- e) compensate the damage arising from occupational illnesses resulting from harassment, in accordance with the law;
- f) provide replies to questions and suggestions relating to harassment in the workplace via the Human Capital Department;
- g) deal with complaints of harassment in the workplace and to instigate disciplinary proceedings whenever the legal requirements for this purpose are met.

6. STANDARDS OF CONDUCT ³

6.1. IP Group employees are responsible for avoiding / preventing harassment in the workplace, and are required, in particular, to:

- a) treat all co-workers with respect and courtesy, abstaining from the use of derogatory language or verbal, physical or psychological abuse;
- b) participate in training and awareness-raising actions by the IP Group on the topics of preventing and combating harassment in the workplace;
- c) report situations of harassment in the workplace.

² and ³ Source: "Information Guide for the Prevention and Fight against Harassment in the Workplace: An instrument to support self-regulation, issued by the Committee for Equality at Work and in Employment (CITE)"

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- 6.2. All employees involved (including whistleblowers, witnesses, inquiry process investigators) must act with the discretion necessary to protect the dignity and privacy of every person, not disclosing information to other parties who are not involved in the incident, without prejudice to the actions provided for under the law and in this document.
- 6.3. IP Group employees must not:
- devalue the work of colleagues;
 - ridicule, directly or indirectly, a physical or psychological characteristic of co-workers;
 - spread rumors or make malicious comments about co-workers;
 - adopt intimidating behavior towards co-workers;
 - violate the duty to allow workers to perform their duties.

7. COMPLAINT – PROCEDURE

- 7.1. With respect to behavior in a situation of harassment in the workplace, it is recommended that IP Group employees:
- should they consider it appropriate, inform their direct manager with a view clarifying any queries and identifying the most appropriate way of acting; and/or,
 - inform the Human Capital Department via the following means:
 - Platform [Reporting irregularities](#).
 - Physical mail: INFRAESTRUTURAS DE PORTUGAL,
SA APARTADO 504
R. Galileu Saúde Correia
18-A 2805-999 Pragal
- 7.2. Any complaint made to the Human Capital Department will not prejudice the right of employees to use the competent national authorities, in particular the Authority for Working Conditions, the Committee for Equality at Work and in Employment and the General Inspection of Finance.
- 7.3. Complaints of harassment in the workplace made to the Human Capital Department must:
- be in writing, providing a detailed description of supporting facts and where and when the incident(s) took place (words or expressions used, occurrences, and the date and time, mention of any witnesses, indication or submitting of documentary evidence, etc.);
 - identify the complainant, who must expressly indicate whether they wish to maintain their identity confidential.
- 7.4. The receipt of a complaint containing a description of facts that may constitute harassment, shall lead to an investigation procedure which will result in:
- the decision to instigate a disciplinary procedure; or,
 - the closure of the investigation, due to insufficient grounds and/or evidence, or the implementation of measures deemed appropriate in view of the situation reported.

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8. COMPLAINT – GUARANTEES

8.1. Guarantees provided when complaints are made to the Human Capital Department include:

- a) respect for the principles of confidentiality and non-retaliation;
- b) the protection of personal data and information security as described in paragraph 10;
- c) the sending of information to the complainant on the status of the procedure;
- d) that the complainant and the witnesses put forward by the complainant may not be subject to disciplinary penalties, unless they act deceitfully, on the basis of statements made or facts contained in proceedings or judicial or administrative procedures or penalties, as a result of harassment, up to the point of a final judgement, without prejudice to the right to challenge.
- e) explanation of the reasons leading to the decision to close the investigation procedure.

8.2. The guarantees set out in point 8.1 (a) shall also apply to requests for support made to direct managers.

9. CONSEQUENCES OF HARASSMENT IN THE WORK PLACE

9.1. Harassment is prohibited, it contaminates the working environment and has negative effects on victims and employers.

9.2. Harassment constitutes very serious workplace misconduct and may lead to the instigation of criminal and disciplinary procedures against the offender and entitles victims to compensation.

10. PERSONAL DATA PROTECTION

10.1. Information provided pursuant of this Policy will be used exclusively for the purposes set out therein, in strict compliance with the provisions of the General Data Protection Regulation.

10.2. The sharing of special categories of data (or other) that are not relevant to the investigation in question will be avoided in order to prevent excessive collection of personal data or jeopardize the principles of data protection;

10.3. The right to access, rectification, erasure, opposition, limitation and portability shall be exercised by notifying the Data Protection Officer dpo@infraestruturasdeportugal.pt;

10.4. Technical and organizational information security measures are applied;

10.5. Personal data that are manifestly not relevant to the processing of the complaint are immediately deleted, and data subjects have the right to lodge a complaint with the supervisory authority – the National Data Protection Commission;

10.6. Complaints received are registered and stored for a minimum period of five years, without prejudice to other storage times arising from specific legal requirements and storage obligations while judicial and/or administrative proceedings are underway in relation to the complaint.

11. INTERPRETATION

The Human Capital Department is responsible for clarifying any queries that may arise regarding the interpretation and/or application of this Policy.

12. DISSEMINATION AND AWARENESS

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- 12.1. The Policy for the Prevention and Fight against Harassment in the Workplace is provided to all employees of the IP Group through publication on *the intranet*.
- 12.2. This Policy is also provided on the website of every company in the IP Group.
- 12.3. Awareness raising actions considered appropriate for improving knowledge of, better understanding and implementation of this Policy will be promoted.

13. ENTRY INTO FORCE

The Policy for the Prevention and Fight against Harassment in the Workplace came into force on 12 April 2018 and the first review was approved on 10 November 2022.