

Code of Good Conduct

To prevent and fight harassment
at the workplace



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Introduction

- Article 29 of the Labour Code forbids “the practice of harassment”, in any of its forms, including sexual harassment.
- Law no. 73/2017, of 16th August, introduced new rules in same Code, aiming at reinforcing the harassment prevention and fight, particularly by requiring the adoption of a code of conduct for that purpose by companies with seven or more employees.
- This Code of Good Conduct to Prevent and Fight Harassment at the Workplace aims at complying with the obligation set out in Article 127(1)(k), of the Labour Code in force, and implement the provisions laid down in 2.14 and 4.14 of the CTT and Banco CTT Codes of Conduct without prejudice to the internal regulations in force within the CTT Group.
- This Code of Good Conduct establishes acting principles and specific rules deemed adequate for CTT and the companies that at any given time are in a parent-subsidiary or group relationship with it (Subsidiaries) to prevent and fight harassment at the workplace within the CTT Group. Those principles and rules be complied with by all those carrying out their functions in the CTT Group, including the members of the Governing Bodies and those discharging managerial duties, when relating with managers, colleagues and subordinates.
- This Code of Good Conduct shall be disclosed to all those mentioned above and serve as a basis for behavioural training actions to be promoted within the CTT Group.
- CTT and its Subsidiaries recognize the importance of these measures and how essential it is to have and promote a healthy working environment that fosters the dignity of the personnel, aiming to combine the institutional image and corporate success with the fundamental values of professional and human development of all those carrying out their functions in the CTT Group.

Article One

Scope

1. This Code applies to all those carrying out their functions in CTT and in each one of its Subsidiaries, i.e., all Employees, Members of the Governing Bodies and those discharging managerial duties.
2. Within the scope of this Code, the common term “Employees” refers to all those mentioned in 1 above.
3. The obligations defined by the law and by this Code apply individually to CTT and to each one of its Subsidiaries.
4. This Code is complementary and instrumental in terms of legal, regulatory and conventional rules on the matter in force at any time.

Article Two

General principles

1. CTT and its Subsidiaries do not tolerate any kind of behaviour categorized as harassment at the workplace by any Employee towards any colleague, customer, partner or any other person with whom they interact.
2. CTT and its Subsidiaries’ Employees should refrain from practicing any acts that may be deemed as harassment, such as described in Article Three below and in Article 29(2)(3) of the Labour Code.

Article Three

Definition

1. Harassment is understood as an unwanted behaviour based on discrimination actions, carried out when accessing to employment or at the workplace, performing duties or undergoing vocational training, with the purpose or effect of disturbing or constraining the person, affecting her/his dignity or creating an intimidating, hostile, degrading, humiliating or disturbing environment.
2. Sexual harassment is an unwanted conduct related to sex, under verbal, non-verbal or physical form, with the purpose or effect referred to in the preceding paragraph.

Article Four

Report and protection of the complainant

1. The victim of behaviour explicitly deemed as harassment at the workplace engaged by an Employee, or any Employee that is a direct witness, shall communicate in a detailed, reasoned and proved way that situation to the Ethics Committee of CTT or, in the case of a Banco CTT Employee, to the Human Resources department or the Compliance department, which will forward the complaint to the concerned services, namely those with disciplinary powers to undertake investigations for each case.
2. In accordance with Article 127(1)(l) of the Labour Code, CTT and its Subsidiaries agree to initiate disciplinary proceedings upon awareness of any harassment situation at the workplace.
3. CTT and its Subsidiaries shall take disciplinary or judicial actions regarding harassment accusations, which are intentionally fake, abusive or dishonest, should there be any evidence of slanderous complaint or discrimination.
4. All people involved in internal procedures related to harassment at the workplace should act according to the principles of good faith, confidentiality, description, secrecy and impartiality, respecting the person's dignity, and undertake not to disclose any information obtained in the scope of the above-mentioned procedures.

Article Five

Behavioural training

CTT and its Subsidiaries undertake to provide behavioural training with the specific purpose of preventing harassment at the workplace.

Article Six

Interpretation and disclosure

1. In case of doubt in the interpretation of any article, or in the classification of any behaviour, the Employees should request clarifications to the Ethics Committee of CTT or, in the case of a Banco CTT Employee, to the Human Resources department or the Compliance department.
2. CTT and each one of its Subsidiaries shall disclose this Code, on a durable medium, to all Employees, as well as through the corresponding internet and intranet websites.

Article Seven

Entry into force

This Code enters into force immediately after its disclosure to the Employees.

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