

CTT Group Workplace Harassment Prevention and Response Code of Conduct



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Considering that Law No. 73/2017, of August 16, strengthened the legislative framework for the prevention of harassment, introducing, among other modifications, changes to the Labor Code, including the employer's duty to adopt a code of conduct for the prevention and response to workplace harassment whenever the company has seven or more employees,

Considering that the drafting of this Code fulfills the duty stipulated in Article 127, paragraph 1, subparagraph k) of the Labor Code, and implements the principles established in the Codes of Conduct of the CTT Group and Banco CTT, in accordance with the internal regulations in force at the CTT Group,

Considering that this Code establishes principles of conduct and specific rules aimed at promoting a healthy, inclusive, and harassment-free work environment, ensuring the fundamental values of equality and diversity, physical, psychological, emotional, and moral integrity, professional and human development, and the enhancement of the dignity of the people involved,

Considering also that this Code will be duly communicated to all its recipients and will be the subject of training actions, reinforcing the commitment to respect the dignity of all individuals,

Finally, considering the objective of ensuring alignment with the disclosure obligations applicable to companies operating in Europe, particularly those arising from the CSRD (Corporate Sustainability Reporting Directive), the ESRS (European Sustainability Reporting Standards), and the Taxonomy regulation,

The following amendments to the CTT Group Workplace Harassment Prevention and Response Code of Conduct are approved, and the Code now read as follows:

Article 1: Object

This Workplace Harassment Prevention and Response Code of Conduct establishes a set of principles and rules that must be observed by its recipients within the CTT Group, in accordance with the considerations, aiming to disseminate, prevent, identify, eliminate, and punish situations and behaviors that may constitute workplace harassment

Article 2: Scope

1. Under the provisions of this Code, the following definitions apply:
 - a) CTT Group: consisting of companies (hereinafter referred to as subsidiaries) that are, at any given time, under the control or part of the group with CTT, Correios de Portugal.
 - b) Staff: all individuals who perform activities at CTT or any of its subsidiaries, including:
 - Employees: Including direct reports, supervisors and holders of leadership positions.
 - Trainees and other situations considered as professional training.
 - Members of statutory bodies.
 - Provider of work without legal subordination who must be considered to be economically dependent on the beneficiary of the activity.
2. The recipients of this Code are all staff of the CTT Group, and the CTT Group itself, understood as CTT and each of its subsidiaries, individually considered.
3. This Code applies to the provision of professional activities in a broad sense, within the scope of the relationship established between the staff and CTT or each of its subsidiaries, including the performance of duties and behaviors while on duty:
 - a) During and beyond working hours.
 - b) Inside and outside the workplace.
 - c) In-person, remote, or hybrid work arrangements.
 - d) Through all utilized information and communication technologies, including telephone, email, and social media.
4. In accordance with applicable legislation, this Code also applies to all interpersonal contacts established by virtue of professional commitments made within the scope of the relationships between the CTT Group and all companies and business partners with whom it interacts.
5. This Code enhances and reinforces the legal, regulatory, and conventional standards in force within the CTT Group.

Article 3: Scope: Value Chain and Stakeholders

1. All companies within the CTT Group are bound by this Code, regardless of the jurisdiction in which they operate, without prejudice to cases where, due to legal or statutory requirements, they must have their own policies approved by their respective management bodies. In exercising its shareholder function, CTT will seek to promote the adoption of this Code or equivalent principles and commitments.
2. The CTT Group will also assess the external impact of this Code on various stakeholders and actively promote their engagement.
3. Contracted entities deemed critical by the CTT Group, whether as suppliers, partners, or otherwise, may also be subject to audit.

Article 4: General Principles and 'Zero Tolerance' for Harassment

1. The CTT Group unequivocally rejects any conduct contrary to the fundamental values of equality, diversity, integrity, and human dignity in the workplace. The Group enforces a 'zero tolerance' policy towards any behavior classified as workplace harassment, whether committed by or against its employees, including situations involving colleagues, supervisors, direct reports, clients, partners, or any individuals they interact with.
2. Harassment is strictly prohibited. Staff of the CTT Group must conduct themselves accordingly and refrain from engaging in any actions or behaviors that could be perceived as harassment, as outlined in this Code and the Labor Code.
3. Employees in leadership, supervisory, or coordination roles have enhanced responsibilities in combating and preventing workplace harassment. They have an increased responsibility to lead by example and are obligated to ensure compliance with this Code, actively promote its principles and values, implement appropriate measures, and report any violations to the relevant entities – Ethics Committee (CTT), Human Resources Department or Compliance Department for Banco CTT, or Payshop Supervisory Board. Non-compliance with this Code by these employees indicates serious and culpable behavior that may result in disciplinary action.

Article 5: Definitions of Harassment and Sexual Harassment

1. Any unwanted behavior, particularly that which is based on discriminatory factors, occurring in the context of employment access or during the employment relationship, with the aim or effect of disturbing, constraining, or affecting a person's dignity, creating an intimidating, hostile, degrading, humiliating, or destabilizing environment, is considered harassment.

2. Any unwanted behavior of a sexual nature that occurs verbally, non-verbally, or physically, with the aim or effect mentioned in the previous section, specifically interfering with the work environment or creating an intimidating, hostile, or offensive atmosphere, is considered sexual harassment.

Article 6: Whistleblower Protection

1. Any staff member who believes they have been a victim of behavior explicitly considered as workplace harassment may file a complaint under the terms of this Code and the procedures outlined in the following article.
2. All employees who have personally witnessed conduct that may indicate the practice of harassment must file a complaint under the terms of this Code and the procedures outlined in the following article.
3. Those who file complaints must provide the necessary cooperation within the scope of subsequent disciplinary procedures.
4. The CTT and its subsidiaries commit to initiating a preliminary inquiry or disciplinary procedure whenever they become aware of alleged workplace harassment situations, in accordance with Article 127, paragraph 1, subparagraph I), of the Labor Code.
5. The CTT and its subsidiaries may take disciplinary or legal action regarding accusations of harassment that are intentionally false, abusive, and/or made in bad faith, particularly if there is evidence of malicious accusation or discrimination.
6. All individuals involved in matters related to harassment complaints must act with impartiality, good faith, confidentiality, and discretion, respecting the dignity of those involved.

Article 7: Complaints

1. Staff members can submit complaints through the following channels:
 - CTT: Ethics Channel or comissao.etica@ctt.pt
 - BancoCTT: Human Resources Department or Compliance Department
 - Payshop: Payshop Supervisory Board
2. The complaint must be detailed, including a precise and accurate description of the facts constituting or potentially constituting harassment, specifically regarding the manner, time, and place, the identity of the victim(s), harasser(s), or witness(es), as well as any existing testimonial, documentary, or expert evidence.

3. When a complaint is presented orally, it must be documented in writing.

Article 8: Protection Policy for Victims and Whistleblowers

1. The practice of harassment grants the victim the right to compensation for material and non-material damages, under general law, and as stipulated in Articles 28 and 29, paragraph 4, of the Labor Code.
2. The complainant and the witnesses indicated by them cannot be disciplined – unless they act with intent – based on statements or facts contained in the records of the judicial or administrative offense proceedings triggered by harassment until the final decision, which has become final and unappealable, without prejudice to the exercise of the right to a defense, as stipulated in Article 29, paragraph 6, of the Labor Code.
3. Dismissal or any other sanction allegedly applied to punish an infraction is presumed to be abusive if it occurs within one year after the complaint or other exercise of rights related to harassment, equality, or non-discrimination, as stipulated in Article 331, paragraph 2, subparagraph b), of the Labor Code.
4. Just cause for termination of the contract by the employee includes any offense to the employee's physical or moral integrity, freedom, honor, or dignity, punishable by law, including the practice of harassment reported to the labor inspection service, committed by the employer or their representative, as stipulated in Article 394, paragraph 2, subparagraph f), of the Labor Code.
5. The practice of harassment constitutes a very serious administrative offense, without prejudice to any potential criminal liability provided for by law, as stipulated in Article 29, paragraph 5, of the Labor Code.
6. The complainant benefits from the protection granted to any whistleblower under general law and, with the necessary adaptations, from the CTT Group's Whistleblowing Policy.
7. The protection outlined in this article applies to all individuals engaged in the practices specified by this Code.

Article 9: Training

1. The CTT and its subsidiaries commit to develop behavioral enhancement initiatives to promote a culture of mutual respect and understanding, reinforcing the importance of an inclusive and harassment-free work environment.
2. The training will include guidelines on appropriate behaviors and harassment prevention strategies, applicable to all employees of the CTT Group.

Article 10: Standards and Safeguards

1. The CTT Group adheres to and promotes compliance with applicable international, European, and national legislation and regulations. It aligns its activities with the reference standards or initiatives of the United Nations, the Organisation for Economic Co-operation and Development, and the International Labour Organization, and implements clear, auditable processes that encompass its corporate due diligence responsibilities.
2. Regarding the prevention and response of workplace harassment, the activities of the CTT Group are aligned with:
 - a) The Ten Principles of the UN Global Compact, particularly with regard to the protection of human rights and the fight against abuses.
 - b) The United Nations Guiding Principles on Business and Human Rights, especially concerning the responsibility of businesses to respect human rights.
 - c) The United Nations 2030 Agenda, particularly regarding gender equality (SDG #5) and decent work (SDG #8).

Article 11: Governance: Approval, Implementation, Control, and Disclosure

The implementation of this Policy takes place within the framework of CTT Group's internal governance model, under the following terms:

Approval:	Board of Directors
Implementation:	Executive Committee and ESG Steering Committee Area(s) responsible for people management & development
Control:	Sustainability Committee Ethics Committee
Disclosure:	Area(s) responsible for internal and external communication and disclosure

Article 12: Interpretation, Consultation and Information

1. Questions regarding the interpretation of this Code can be directed to the CTT Ethics Committee.
2. For Banco CTT, questions can be directed to the Human Resources Department or Compliance Department, and for Payshop, to the respective Supervisory Board.

3. This Code will be subject to consultation with the Workers' Committee and communicated to all employees through common internal channels. It will be available on the website and the intranet of CTT and its subsidiaries.
4. Additional information can be found on the CITE website.

Article 13: Validity and Amendments

1. This Policy was approved on 20 March 2025 and is reviewed at least every 2 years.
2. The revised code will take effect 30 days after being communicated to employees, superseding OS00042017CA, dated December 20, and any conflicting internal regulations.