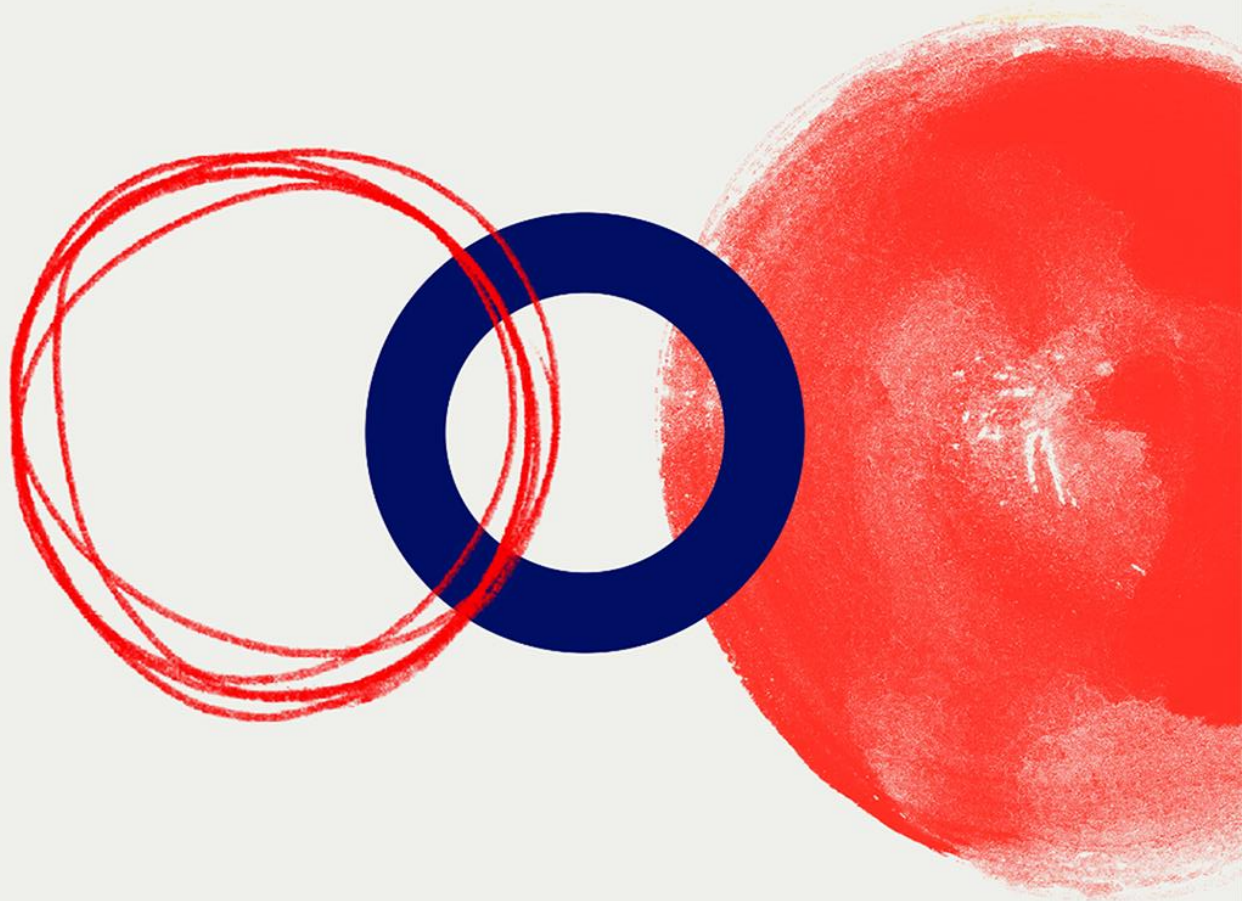


# Code of Conduct for the Prevention and Combating of Harassment in the Workplace



# 01

Preamble

03

# 02

Purpose and scope  
of application

04

# 03

Prohibition of  
harassment

04

# 04

Reporting situations that  
could constitute  
harassment at work

06

# 05

Disclosure

06

# 06

Revision

08

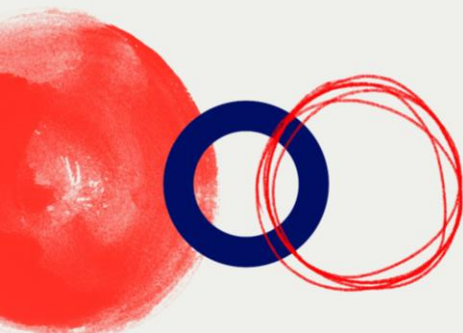
## 1. Preamble:

This code aims to implement mechanisms to prevent and combat harassment at work, in compliance with Article 127(1)(k) of the Labour Code and applies to MCretail, SGPS, S.A. and all the companies in the MC universe.

Our mission, principles and values are essential. Our behaviour is the sum of the actions of **each one of us and we all have to act to prevent harassment at work**. This Code aims to establish a set of principles and rules of behaviour to guide and discipline MCretail, SGPS, S.A. employees in **preventing and combating harassment in the workplace**.

We trust that each of us will know how to prevent and combat harassment in the workplace, promoting the consolidation of respect, honesty and integrity that should govern our working relationships.

The rules contained in this Code must be understood and practised by all Employees wherever they work and regardless of their hierarchical position or their specific roles and responsibilities.



## **2. Purpose and scope of application**

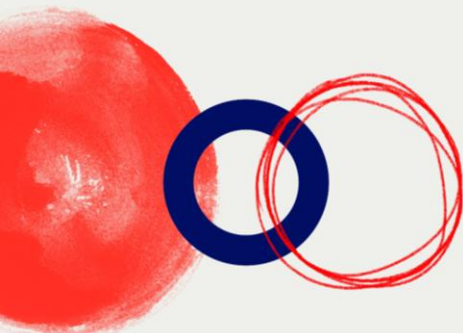
**2.1.** This Code of Good Conduct governs the implementation of mechanisms to prevent and combat harassment at work.

**2.2.** This Code of Good Conduct must be observed by the members of the Governing Bodies of MCretail, SGPS, S.A. and the companies in the MC universe, and by all Employees.

## **3. Prohibition of harassment**

**3.1.** Harassment is expressly prohibited.

**3.2.** Harassment is defined as unwanted behaviour, in particular that based on discrimination, practised at the time of access to employment or in employment, work or vocational training, with the aim or effect of disturbing or embarrassing a person, affecting their dignity, or creating an intimidating, hostile, degrading, humiliating or destabilising environment.

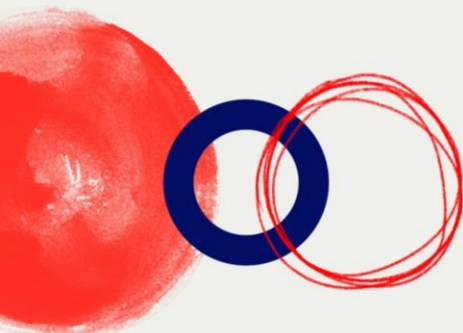


**3.3.** In their interpersonal relationships, job applicants, recruiters and employees must always observe the principles of loyalty, integrity, cooperation, urbanity and respect, guiding their reciprocal relations by cordial, courteous and professional treatment and refraining from any behaviour that could interfere with their dignity.

**3.4.** The exercise of coordination or management functions must be carried out with absolute respect, encouraging dialogue, team spirit and respect between work colleagues.

**3.5.** When carrying out their duties, employees must act with loyalty, team spirit and respect towards their coordinators and/or managers.

**3.6.** A culture of respect among employees is essential and must be observed on a daily basis.

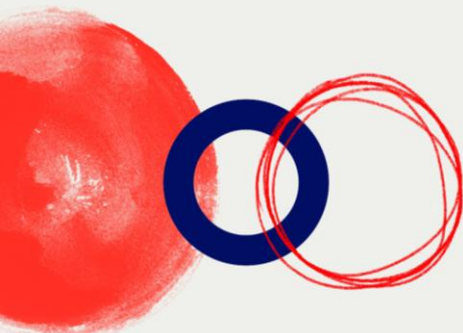


## 4. Reporting situations that could constitute harassment at work

4.1. Employees who are the target of behaviour that could constitute harassment at work, as well as employees who witness such behaviour, must report it immediately or as soon as possible.

4.2. The report should preferably be in writing, duly substantiated and contain the following elements:

- i. Identification of the employee targeted by the alleged harassment;
- ii. Identification of the employee who committed the alleged harassment;
- iii. Place and date of the events;
- iv. Description of the facts attributed to the employee who committed the alleged harassment, as exhaustively and clearly as possible;
- v. The names of any witnesses or elements that can prove the facts reported.



**4.3.** The report must be made, delivered or addressed to the People Manager, who will endeavour to investigate the facts reported promptly and efficiently, in strict compliance with the law in force at the time.

**4.4.** The enquiry procedure will be conducted in such a way as to ensure that the privacy, confidentiality and dignity of those affected are protected at all times, without prejudice to the relevance of the report and its elements for the purposes of disciplinary proceedings.

**4.5.** Whenever there is a report of alleged harassment at work, disciplinary proceedings will be initiated and, if the harassment is proven, the harasser will be punished disciplinarily, without prejudice to any civil and/or criminal liability provided for by law.

**4.6.** The person reporting the harassment and the witnesses they have named may not be disciplined for statements made or facts established in judicial or administrative offence proceedings triggered by harassment, until the final judgement has been handed down, unless they act intentionally.

## 5. Disclosure

This Code of Good Conduct is publicised on the Intranet, as well as through other internal means, namely by posting it in the respective units of all the companies in the MC universe.

## 6. Revision

This Code of Good Conduct may be revised/updated at any time and according to specific needs, and Employees will be informed of this.

**1 September 2017**

