



Patricia Pilar
GRUPO

Code of Good Conduct for Preventing
and Combating Harassment at Work

2025

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01 | Introduction

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The Patrícia Pilar Group of companies, referred to as the **Patrícia Pilar Group**, adopts a zero-tolerance policy toward any form of moral or sexual harassment in the workplace, including discriminatory behavior towards others or third parties, particularly based on race, gender, age, physical disability, sexual orientation, opinions, political ideology, or religion.

The Group is committed to ensuring a respectful, dignified, and safe working environment for all its employees. To this end, it adopts this Code of Good Conduct for the prevention and combat of workplace harassment and undertakes to initiate disciplinary proceedings whenever it becomes aware of alleged harassment situations at work. This Code of Good Conduct is established in accordance with Law No. 7/2009, which approves the Labor Code, and Law No. 73/2017, which strengthens the framework for the prevention and combat of workplace harassment.

It applies to all employees and managerial staff, regardless of the type of employment relationship, as well as to anyone performing professional activities on its premises. Employees must adhere to principles of rigor, transparency, legality, non-discrimination, and good faith to maintain the Group's credibility and reputation.

02 | Definitions



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Harassment is understood as unwanted behavior, particularly when based on a discriminatory factor, occurring during access to employment or within the scope of employment, work, or professional training. Such behavior aims or results in disturbing or constraining the individual, affecting their dignity, or creating an intimidating, hostile, degrading, humiliating, or destabilizing environment.

Sexual harassment is defined as unwanted behavior of a sexual nature, whether verbal, non-verbal, or physical, with the intention or effect described in the previous paragraph.

The act of harassment grants the victim the right to compensation, as stipulated in the previous article.

The practice of harassment constitutes a very serious administrative offense, without prejudice to any potential criminal liability provided for by law.

A close-up photograph of two hands shaking, symbolizing agreement or partnership. The hands are light-skinned and the background is a solid teal color.

03 | Preventive Measures



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The Patrícia Pilar Group Implements the Following Measures to Prevent Workplace Harassment:

I

Creation and Dissemination of Prevention

- Establishes and adopts clear Codes of Conduct that explicitly prohibit any form of harassment and define acceptable workplace behaviors;
- Ensures that all employees have access to the Codes of Conduct and Regulations.

II

Training and Awareness

- Promotes training sessions for all employees on moral and sexual harassment, discrimination, and ethical behavior;
- Spreads awareness about the impact of harassment and emphasizes the importance of maintaining a respectful environment.

III

Secure and Accessible Reporting Channels

- Provides confidential communication channels, such as email and phone lines, allowing reports to be made safely and anonymously, if necessary;
- Ensures reports are handled with absolute confidentiality and provides psychological and legal support when applicable.

IV

Independent Department

- Maintains a specific department responsible for handling complaints and conducting investigations related to harassment.

V

Monitoring and Evaluation of the Workplace

- Conducts organizational analyses to identify potential discomfort or risk situations;
- Examines workplace behavior patterns and addresses situations that may trigger conflicts.

VI

Support and Protection for Victims

- Implements a Protection Regulation that ensures the safety of whistleblowers and witnesses, preventing retaliation;
- Offers psychological support to victims and, when necessary, makes organizational adjustments to preserve their well-being.

III

Promoting an Environment of Respect and

- Encourages a culture of mutual respect and diversity, reinforcing organizational values that discourage abusive behaviors.

These measures aim to create a safe, ethical, and welcoming environment, minimizing the risks of harassment and strengthening the values of the Patrícia Pilar Group.

A close-up photograph of a hand holding a blue pen, writing on a document. The background is blurred, showing a desk and some papers. The text '04 | Reporting Procedures' is overlaid on the left side of the image.

04 | Reporting Procedures

04 | Reporting Procedures

At the Patrícia Pilar Group, anyone who becomes aware of irregular practices that could indicate harassment or the commission of harassment must report them as outlined in this Code of Conduct. Additionally, it is important, whenever possible, to provide the necessary collaboration in any disciplinary processes or criminal investigations, without prejudice to the option of making an anonymous report.

The organization has a Regulation for Reporting Violations that establishes the principles, procedures, and mechanisms for reporting misconduct, in compliance with Law No. 93/2021, dated December 20, which enables the confidential and secure reporting of any violation.

Employees who feel they are victims or witness harassment can use the following reporting channels:

In Person

At the Human Resources Department or the Ethics and Sustainability Department;

E-mail Address

Exclusive for reports
denuncias@patriciapilar.pt

Phone

910 495 366 or 910 382 048;

Suggestions/Complaints Box

Available within the Company.

Reports or complaints may also be made, in accordance with the law, to the Authority for Working Conditions, the Public Prosecutor's Office, or the competent criminal police authority, which provide an email address for this purpose.

Reports can be made anonymously or with identification, in compliance with legal provisions.



05 | Investigation and Resolution

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All investigations are conducted by the Ethics and Sustainability Department, ensuring that reports will be handled with absolute confidentiality, safeguarding the privacy of all parties involved.

The Department is committed to investigating all received reports objectively and impartially, respecting the principle of due process.

If harassment is confirmed, disciplinary sanctions will be applied, which may include warnings, suspensions, or, in the most serious cases, dismissal for just cause.

The practice of harassment constitutes a very serious administrative violation, without prejudice to any criminal liability as provided by law.



06 | Support for Victims

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The Patricia Pilar Group ensures a specific protection regime for whistleblowers and witnesses involved in procedures related to harassment situations. This regime includes guarantees of confidentiality, impartiality, efficiency, and promptness at all stages of the process, aiming to provide comprehensive protection for all parties involved.

Any victim will be provided with:

1

Psychological support or access to external support services, if necessary;

2

Measures to ensure the safety and well-being of the employee, such as adjustments to roles or working hours, if applicable.



07 | Prohibition of Retaliation

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Any form of retaliation against employees who, in good faith, report harassment situations is strictly prohibited. The group is committed to protecting whistleblowers from any reprisals.



08 | Continuous Improvement Commitment



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The Patrícia Pilar Group will review this Code whenever subsequent events occur that justify its revision.

09 | Disclosure



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This Code will be widely disseminated among all employees through its communication channels, as well as being presented to new employees during the onboarding process, including:

Company Website

The Code is published on the official company website at ***www.patriciapilar.pt***, easily accessible to all employees and stakeholders;

Internal Channels

The Code is also communicated through internal channels to reach all employees and ensure access to the information;

Printed Format

A printed version of the Code is made available so that everyone, including employees without online access, can consult and review it easily;

Actions

Through training actions aimed at disseminating and ensuring knowledge acquisition and individual commitment by employees.



10 | Entry into Force



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This Code of Good Conduct comes into force on the date of its approval by the Board of Directors of the Patrícia Pilar Group.

Approved on: 31 / 12 / 2024



Patrícia Pilar

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