



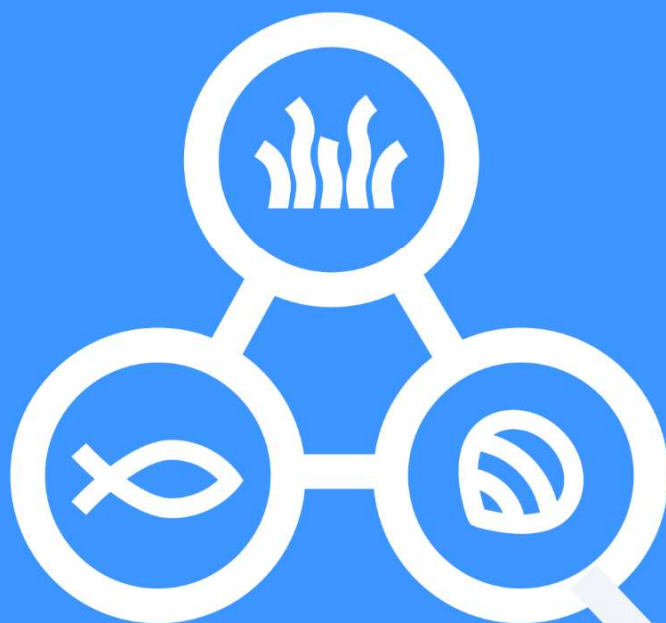
**S<sup>2</sup>AQUA**

Laboratório Colaborativo  
Sustainable and Smart Aquaculture

# CODE OF GOOD CONDUCT FOR PREVENTING AND COMBATING HARASSMENT AT WORK

Document produced and updated by the  
Finance and Operations Department.

Rev. 1 Last updated: 04/11/2022



# INDEX

FRAMEWORK.....	3
CODE OF GOOD CONDUCT FOR PREVENTING AND COMBATING HARASSMENT AT WORK .....	4
1. OBJECT AND SCOPE .....	4
2. COMMITMENT .....	<b>Erro! Marcador não definido.</b>
3. POLICY PRINCIPLES .....	5
4. ROLES AND RESPONSIBILITIES .....	6
5. COMMUNICATION AND COMPLAINTS .....	7
6. INTERNAL PROCEDURES .....	8
7. CONFIDENTIALITY PROTECTION .....	8
8. REFERENCES .....	9

## FRAMEWORK

The Code of Good Conduct for Preventing and Combating of Harassment at Work of S2AQUA - Collaborative Laboratory, Association for Sustainable and Smart Aquaculture (S2AQUA), arises from the applicability of Law No. 73/2017 of August 16<sup>th</sup>, which strengthened the legislative framework for preventing and combating harassment practices at work in the public and private sectors, requiring the employer to adopt codes of good conduct for the prevention and combating of harassment at work and to initiate disciplinary proceedings whenever sufficient evidence of bullying and/or sexual harassment is known.

This Code of Good Conduct is based on S2AQUA's occupational safety and health policy, implementing psychosocial risks and, in particular those related to harassment and violence at work, the general principles and rules of a legal, ethical and deontological nature that should guide the behavior of its workers, with a view to preventing and combating them.

# CODE OF GOOD CONDUCT FOR PREVENTING AND COMBATING HARASSMENT AT WORK

## 1. OBJECT AND SCOPE

This Code of Conduct establishes the policy, guidelines for professional conduct and procedures for preventing and combating harassment at work of S2AQUA workers and all those who perform their professional activity in the facilities.

## 2. COMMITMENT

2.1. S2AQUA as a non-profit private law association promotes mutual respect for the dignity of employees at work at all levels and expressly rejects any practice of moral and/or sexual harassment at work, as it is incompatible with the dignity of the human person.

2.2. S2AQUA is committed to **maintaining in its workplaces a policy of preventing and combating any form of harassment and/or violence**, by lawful or unlawful act, based or not on discriminatory factors based on ancestry, age, sex, sexual orientation, gender identity, marital status, family situation, economic situation, education, origin or social status, genetic heritage, reduced working capacity, disability, chronic disease, nationality, ethnic origin or race, territory of origin, language, religion, political or ideological beliefs and trade union membership, or any other factors of discrimination.

### 3. POLICY PRINCIPLES

3.1. S2AQUA and its employees act with a view to pursuing the public interest, respecting the principles of equality and non-discrimination, prevention and combating harassment and/or violence at work.

3.2. In the exercise of their activities, functions and competences, S2AQUA employees relate in a respectful, fair, urban and dignified manner, refraining from verbal, physical and/or psychological abuse and discriminatory behavior in relation to other workers or third parties, and apply the constitutionally and legally enshrined principles of protection of fundamental rights in relations between individuals, equality, personal integrity, confidentiality and good faith.

3.3. Harassment and other behavior stemming the use of violence at work are primarily the object of preventive interventions, without prejudice to corrective and repressive interventions, with the following main purposes:

- Promote an organizational culture of zero tolerance regarding the practice of harassment;
- Promote the awareness of employees about the importance of preventing, combating and eliminating harassment and/or violence at work;
- Provide employees, and their representatives, with the necessary tools to prevent, identify and manage harassment;
- Ensure the existence of internal mechanisms for reporting dangerous situations, as well as a reporting channel on irregularities susceptible to disciplinary action;
- Ensure the confidentiality of information managing processes and the absence of reprisals against whistleblowers and/or witnesses;
- Initiate disciplinary proceedings, in accordance with the General Labor Law, whenever one becomes aware of alleged situations, acts or behaviors that may have indicted harassment or violence at work;
- Speed up the processing of associated procedures;

- Not to tolerate false accusations and their perpetrators should be subject to disciplinary action;
- Disseminate the Code of Good Conduct to its recipients.

## 4. ROLES AND RESPONSIBILITIES

4.1. All holders of S2AQUA management positions are responsible for maintaining a work environment that promotes individual and professional dignity, health, integrity and physical and psychological well-being.

4.2. It is up to S2AQUA employees to:

- Collaborate with their directors in maintaining a work environment that promotes individual and professional dignity, health, integrity and physical and mental well-being;
- Report situations of serious danger of harassment and/or violence at work.

4.3. The S2AQUA Board, in partnership with the finance and operations department, the communication and marketing department and the legal advisor, are responsible for promoting preventive activities to combat harassment, namely:

- Receive and address communications of situations of harassment and/or violence at work that workers may present;
- Provide the advice and assistance that potential victims of harassment and/or violence may request;
- Promote the performance of health examinations for employees who show health situations resulting from exposure to harassment and/or violence at work;
- Receive and process the information received;
- Boost awareness-raising, training and/or information actions;
- Monitor and make a point of situation on the activities carried out in the implementation of this Code;
- Propose appropriate disciplinary action in the event of false accusations filed;

- Make known this Code whenever there are new admissions of workers, including those who are in a probationary regime or in a trial period or whenever service providers who regularly carry out activities with their employees are hired;
- Ensure the implementation of training, information and awareness-raising activities that are considered necessary;
- Ensure, inform the number of training, information and awareness-raising actions carried out on the subject and the number of the corresponding recipients;
- Disseminate this Code by the employees;
- Analyze complaints about irregularities that may be submitted about disciplinary action;
- Process the applicable disciplinary procedures.

## 5. COMMUNICATIONS AND COMPLAINTS

5.1. Employees who consider themselves to be harassed at work that may constitute a disciplinary offence may report the situation to the President of the Board and to the Financial and Operations Responsible of S2AQUA.

5.2. Communications and complaints, if merely verbal, shall be reduced to writing with the full identification of its author or whistleblower.

5.3. Communications and complaints shall be supported with detailed information, including the identification of the harassed person, the identification of the victim, the local(s), the date(s) on which the facts occurred(s), the detailed description of the facts and the means of proof, in the context of personality protection, equality and prohibition of discrimination.

5.4. Communications and complaints are made through the email [provedor@s2aquacolab.pt](mailto:provedor@s2aquacolab.pt) addressed to the President of the Board and to the Financial and Operations Responsible of S2AQUA.

## 6. INTERNAL PROCEDURES

6.1. After the complaint has been received, it must be sent to the legal adviser for the purposes legally provided for.

6.2. If the President of the Board deems it appropriate, he/she may request support from the heads of the departments/areas of activity and/or other members of the Board.

6.3. In a quick manner, preliminary information shall be sent to the President of Board of S2AQUA within 15 working days of its distribution, as to the clearance of sufficient evidence of conduct likely to include an intimidating, hostile or humiliating environment of coercion or threat, in relation to the possible harassed and, where appropriate, of falsehood of the accusations.

## 7. CONFIDENTIALITY PROTECTION

7.1 The confidentiality of the procedure is ensured in relation to the whistleblower, the accused, the content of the complaint, evidence, documentary or expert evidence, covering the steps taken or to be carried out, so that all actors must act with the necessary secrecy to protect the dignity and privacy of each one, and no information should be disclosed, ensuring the exemption, equality and transparency of the whole procedure for all persons involved.



7.2. Absolute confidentiality is also ensured for all personal data collected, which will be used exclusively within the scope of the tasks and purposes provided for in this Code.

7.3. The whistleblower and the witnesses indicated by him/her, who have reported or prevented acts of harassment or abusive pressure, may not be sanctioned disciplinarily, on the basis of statements or facts contained in the file of proceedings, judicial or counter-ordenational, triggered by harassment or violence at work until final decision has become final, without prejudice to the exercise of the right to contradictory, unless they act with intent to make a false accusation.

## 8. REFERENCES

Comissão Europeia (2007): Comunicação da Comissão ao Conselho e ao Parlamento Europeu que transmite o acordo-quadro europeu sobre assédio e violência no trabalho, COM(2007) 686 final, available on this [link](#)

Bernardo Coelho et al (2018): Guia para a Elaboração de Código de Boa Conduta para a Prevenção e Combate ao Assédio no Trabalho, Comissão para a Igualdade no Trabalho e no Emprego, available on this [link](#)

Law No. 73/2017, of August 16<sup>th</sup>



**S²AQUA**

Laboratório Colaborativo  
Sustainable and Smart Aquaculture



Av. Parque Natural  
da Ria Formosa, s/n

8700 - 194 Olhão

PORTUGAL



+ 351 289 715 346



geral@s2aquacolab.pt