CODE OF GOOD CONDUCT FOR PREVENTING AND COMBATING HARASSMENT, VIOLENCE AND INTIMIDATION AT WORK

Goals

This code aims to prevent and combat harassment, violence, and intimidation practices at DareData.
Considering the importance of the work sphere for the construction of identity, we intend to contribute to the recognition of this space as an example of responsibility and accuracy, safeguarding the moral integrity of our workers, collaborators and service providers and aensuring their right to work conditions that respect their individual dignity.

From now on, every worker, collaborator and service provider shall be referred to as *worker,* within the context of contractual relationships with DareData (as an employee or as a service provider).

Context

This code is an instrument whose principle is the appreciation of all workers of our company, promoting respect for diversity, cooperation, and teamwork.
It aims to alert the entire DareData community about the importance of building a healthy work environment, guided by non-discrimination, through the promotion of ethical, moral, and legal values.

This code is also a privileged instrument in resolving related ethical issues, serving as a guide and ensuring compliance with the prescribed standards.

Who is it addressed to

This code was written for the entire DareData community.

Starting with its workers this code must be understood as a key instrument in the relationship between workers and between them and their managers.

Given the large number of workers with which we maintain professional relationships, this document must be known by all of them, and kept as a standard of their daily practices, whether with other workers in the company or with the managers with whom they interact.
Concerning our partners and customers, we understand that the same logic remains and that their knowledge and respect for these foundations is required, whether in their relationship with the company's workers or in their interaction with other service providers.

What is it

Intimidation, harassment, and violence at the workplace are highly interconnected, undermine the dignity of individuals, and cannot be separated from more generic forms of inequality of access to resources, powers, and prestige. At the same time, they are a manifestation of the abusive use of power, which can make any workplace a place of social vulnerability.

Intimidation can take many forms and affects those who suffer from it on a moral, physical, and psychological level. This practice can be recognized when any member of the organization is exposed to a situation that is based on humiliation, and the most recurrent examples of intimidation can consist of:

- Physical aggression (is the most extreme and evident way)
- Harassment:
    - Being the target, consecutively, of situations that incite work stress in an unmeasured way and outside the normal workflow, which make you constantly uncomfortable in your workplace;
    - Being the target of various offensive “jokes” regarding sexual, racial, religious orientations, disabilities, or other health problems.

Moral harassment is characterized by a set of unwanted behaviors, perceived as abusive, carried out persistently and repeatedly, that may consist of a verbal attack with offensive or humiliating content or subtle acts, which can include psychological or physical violence. This practice is identified by:

- Social isolation
    - Promoting isolation or lack of contact with coworkers;
    - Promoting isolation or lack of contact with managers.
- Professional harassment
    - Setting impossible-to-achieve goals;
    - Systematically devaluing work;32
- Bullying
    - Systematic threats of dismissal;
    - Promoting stressful situations to cause a lack of control.
- Personal humiliation
    - Being humiliated due to physical, psychological, or other characteristics.

Sexual harassment is characterized by a set of unwanted behaviors, perceived as abusive, of a physical, verbal, or non-verbal nature, which may include attempts to physical contact, requests for sexual favors to obtain advantages, blackmail, and even the use of force or coercive strategies. They are generally reiterated, but may also be unique, explicit, and with a threatening nature. Sexual harassment can tend to be characterized by:

- Sexual insinuation:

    - Jokes or comments about your appearance that offend you;
    - Jokes or offensive comments about your body;
    - Offensive jokes or comments of a sexual nature;
- Unwanted sexual attention:
    - Invitations to unwanted meetings;
    - Explicit and unwanted proposals of a sexual nature;
    - Unwanted proposals of a sexual nature via email, text messages, or through websites and social networks;
    - Offensive phone calls, letters, text messages, emails, or images of a sexual nature;
    - Ingratiating looks;
    - Intrusive and offensive questions about private life.
- Physical contact and sexual assault:
    - Unwanted physical contact;
    - Assault or attempted sexual assault.
- Grooming:
    - Requests for sexual favors, associated with promises of obtaining a job or improving working conditions.

Violence covers a broad spectrum of harmful behaviors with serious repercussions at individual and organizational levels. This problem is not just limited to physical attacks but extends to a series of actions that compromise the safety and well-being of employees, creating a hostile environment that is harmful to the healthy development of work activities.
Violence can be understood as:

- Internal, when it occurs between the organization's professionals, whether they are workers, supervisors or managers;
- External, when it is represented in a situation that takes place between one of the organization's professionals and someone external to the organization (partners, clients, other individuals);
- Any action, incident, or behavior that is outside the acceptable standards of normal conduct, where the worker, during his work or as a direct result of it, is robbed, threatened, injured, or insulted.
- All actions resulting from intimidation or harassment.

Prevention and combat

Preventing and combating the practices previously described constitute a priority for modern societies and a primary objective of DareData as an entity and as a community.

Considering both the legislative framework's commitment to preventing these practices, such as its framing at a normative level (at a national and European level), this code calls for ethical conduct in the workplace and for maintaining interpersonal relationships based on mutual respect.

Therefore, it should be understood as a commitment between all stakeholders of the DareData community to:

- Promote the appreciation and well-being of everyone;
- Promote a good organizational climate and healthy and positive working relationships;
- Promote productivity and organizational development by defending the rights of all people.

The Policy

I. Organization's commitment and responsibilities

1. The commitment:
    a. Harassment and intimidation are contrary to DareData Lda policy, hereinafter identified as DD, and against the promotion of decent working conditions;
    b. All workers should benefit from a work environment free from intimidation, harassment, and possible retaliation;
    c. Intimidation, harassment, and violent practices harm work relationships and are not tolerated by DD.
    d. Anyone who does not comply with these fundamental principles is subject to the prescribed sanctions.

2. Responsibilities:
    a. The entire DD community is responsible for complying with a zero-tolerance policy regarding intimidation, harassment, and violence, according to the examples previously presented.

II. Scope of the code of conduct

1. It applies to all people, individual or collective, who maintain professional, commercial, or other relationships with DD, even if temporary.
2. It applies to all workers, administration, and managers.
3. It applies to all relationships within the scope of DD's activities, whether they take place during normal working hours or outside of them, at its headquarters, or on work trips.
4. It applies to relationships within the scope of DD's activity, whether done in person or remotely.

III. Application in the regulation of professional and/or commercial relationships

1. The commitment to zero tolerance is an integral part of contracts for the acquisition of services, both for the entities or people contracted and for clients and partners who contract DD's services.

2. The commitment to zero tolerance is an integral part of the employment contracts and collective bargaining agreements by which DD is governed.

IV. Complaint

1. Any person covered by this code of conduct, who believes that they have been subjected to any practice of intimidation, harassment, and/or violence must contact the specific prevention and combat unit, via email to **denuncia@daredata.engineering.**
2. Anyone covered by this code of conduct must report an incident, whether they were the target or just a witness, via email to **denuncia@daredata.engineering.**
3. People who report incidents are especially protected by the DD from all forms, or attempts, of retaliation.
4. Retaliation is a serious violation of this policy and, like intimidation, harassment, violence, or discrimination itself, will be subject to disciplinary action.

V. Investigation and resolution

1. Investigation and resolution process must be conducted by DD workers with specialized knowledge in preventing and resolving harassment, to be designated by the responsible person for human resources, Ivo Bernardo.
2. Investigation and resolution process guarantees equality and transparency of all procedures for all people involved (complainant, accused, and witnesses).
3. Investigation and resolution process guarantees the anonymity of all people involved (complainant, accused, and witnesses).

VI. Sanctions

1. Workers involved in prohibited behaviors by this policy, as well as those who make reports in bad faith, will be subject to disciplinary action.
2. The practice and attempt of intimidation, harassment, violence, and retaliation by DD's suppliers or clients results in the immediate termination of respective service agreements.
3. Recurrence of abusive behavior by a worker (targeting the same person or another) may result in the immediate termination of the employment contract or the termination of the contract for services.
4. Any form of retaliation recorded during the investigation process greatly aggravates possible sanctions.
5. In particularly serious cases and/or if proof of the incident is verified, DD will provide full legal, technical, and financial support to the worker who has been the target of this abusive behavior so that he can seek civil and/or criminal justice.

VII. Principles for formulating a zero tolerance policy

1. A zero tolerance policy is guided by action at three levels of prevention, these being primary, secondary, and tertiary.
2. Acting at the level of primary prevention involves:
    a. the existence of specific information and dissemination strategies relating to preventing and combating intimidation, harassment, and violence at work;
    b. the design and implementation of a specific and regular training plan around issues related to bullying, harassment, violence, and gender equality at work;
    c. this training must include all workers in a transversal and top-down logic.
3. Action at the secondary prevention level must:
    a. put into effect a system or mechanism for reporting and solving incidents of intimidation, harassment, and violence at work;
        i. this mechanism must operate with autonomy;
        ii. the responsible people for hosting and developing incident resolution processes will have specific training;
        iii. the incident resolution system or mechanism must guarantee the anonymity of those involved;
        iv. the incident resolution system or mechanism must guarantee equality for all people involved in the procedures and access to information relating to the development of the resolution process;
        v. the incident resolution system or mechanism must guarantee non-retaliation against whistleblowers and witnesses;
        vi. The incident resolution system or mechanism must ensure the monitoring and evaluation of the effective resolution of each incident handled.
4. Action at the tertiary prevention level, without prejudice to what has already been defined within the scope of this code of conduct, must:
    a. clearly and explicitly define the internal sanctioning framework and its form and scope of application.
    b. In addition to internal sanctions, the zero tolerance policy must take into account the general regulatory and legal framework and must ensure that DD can support harassed workers in recourse to civil and/or criminal justice.