

Workplace Conduct & Anti-Harassment Policy

Company Name: 2Windservice Lda

Effective Date: 01/07/2025

Review Date: 30/06/2026

1. Purpose

This policy affirms **2Windservice Lda** is commitment to maintaining a workplace free from discrimination, harassment, abuse, coercion, and intimidation. We strive to foster a culture of respect, dignity, and equality for all individuals.

2. Scope

This policy applies to:

- All employees, contractors, interns, and temporary staff
- All interactions within the workplace, including remote work environments
- All third parties interacting with our workforce (e.g., clients, suppliers, visitors)

3. Policy Statement

2Windservice Lda strictly prohibits:

- Discrimination based on race, gender, age, religion, nationality, disability, sexual orientation, marital status, or any other protected characteristic
- Sexual harassment, including unwelcome advances, inappropriate comments, or physical contact
- Physical harassment or abuse, including threats, assault, or any form of violence
- Mental or verbal abuse, including bullying, insults, humiliation, or manipulation
- Coercion or intimidation, including pressure to act against one's will or threats of retaliation

4. Definitions

- Harassment: Unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading, or offensive environment
- Discrimination: Unfair treatment based on personal characteristics unrelated to job performance
- Abuse: Any behavior that causes physical or emotional harm
- Coercion: Forcing someone to act through threats or pressure

5. Reporting Procedures

Employees who experience or witness misconduct should report it promptly via:

- Direct contact with Management or their line manager
- Written complaint submitted to the Compliance Officer

All reports will be treated confidentially and investigated thoroughly.

6. Investigation and Resolution

- Investigations will be impartial, timely, and respectful of all parties
- If misconduct is confirmed, disciplinary action will be taken, up to and including termination
- Support will be provided to affected individuals, including counseling or mediation if needed

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7. Protection Against Retaliation

2Windservice Lda prohibits retaliation against anyone who reports misconduct or participates in an investigation. Retaliatory behavior will be treated as a serious violation of this policy.

8. Training and Awareness

- All employees will receive training on workplace conduct and harassment prevention during onboarding and annually thereafter
- Managers will receive additional training on handling complaints and fostering inclusive teams

9. Monitoring and Review

This policy will be reviewed annually and updated to reflect changes in law, best practices, or company operations. Feedback from employees is encouraged to improve its effectiveness.

10. Responsibility

The Management is responsible for oversight. Day-to-day implementation is managed by the HR.

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