



BELCINTO

SOCIAL MANUAL

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Part I

I. Internal Regulation

Welcome

Dear Partner,

Welcome to our team «Belcinto». We count on you, on your commitment and dedication to improve the quality of the services we provide to our customers. The key to our success is professionalism, competence, a positive attitude and a progressive learning to face new challenges, because only when we surpass ourselves we can be among the best.

In order you feel well integrated in this large family, we've elaborated this social manual to help you with relevant information that will be useful in your day-to-day in our company.

Our Story

Our story begins in 1961, in S. João da Madeira, a city in the North of Portugal, which has been internationally known as the art of leather goods for several generations.

Our work, initially focused on handmade leather belts, has been extended to a new product lines, as travel bags, hats, bags and women's accessories.

Our passion for leather goods has grown over the years, as well as our desire to share our art with the world.

Now, we collaborate with brands from all over the world and we've been producing for leading designers, which contributes to our constant learning and evolution around practices, techniques and our global appreciation.

Japan, Spain, France, USA, Germany and England are some of the 35 countries we work for.



We currently have 90 workers and we rely on their art and experience to transform the leather into great quality pieces with the «Belcinto» soul.

II. Rights and Duties

Disciplinary Procedure

The disciplinary procedure to be applied to the worker for committing serious faults is defined in the labor code, and cannot be changed as it is considered imperative.

These legal provisions are only found in the present regulation, referred to in attachment I of this manual.

III. Employee

Attendance and Punctuality

Absences or delays affect the normal planning of our production, as well as affect the colleagues who get extra work to fill the gap, jeopardizing the delivery times confirmed to our customers, and consequently the quality standard of our services. Please, whenever you intend to be absent, communicate in advance to your responsible/manager. In case of an unexpected urgent situation, contact the company by phone to report it.

Time Registration

Whenever you enter or leave the company, you must register on the time registration. At lunch time, you should also make your record of the break.

Behavior



You should prioritize good manners where you work contributing to a good environment, so do not speak loudly or screaming, do not use obscene words or gestures, do not use language that may offend or disrespect co-workers or customers and suppliers. If you need help with troubleshooting, please call the person in charge of the sector and explain the situation so we can solve it in the best way.

Personal objects

All employees are assigned a locker to store their belongings, which is located in the changing room area. It is the responsibility of each one of its contents and its conservation. The company is not responsible for any damage or theft thereof.

Cell phone

During working hours, employees will not be allowed to use private cell phones. Please give the company number and the messages will be transmitted to the respective one.

Improper possession of objects

Improper possession of company or colleagues' objects is considered a serious misconduct and subject to disciplinary proceedings.

Found objects

If you find a lost or forgotten objects, we ask that it be delivered to the office, so in due time, we can send an informative note to alert this occurrence.

Smoke

Smoking harms health and jeopardizes the safety of the company. Therefore, we inform you that according to the tobacco consumption law, smoking is prohibited in any production area, offices, corridors, warehouse, social facilities, showroom or



bathrooms. We inform you that in our company smoking is only allowed outside the building.



Alcoholic beverages

During work hours it is not allowed to drink alcoholic beverages. Do it in your free time, always in moderation.

Confidentiality

Any and all information, whether patented or not, of a technical, operational, legal nature, such as technical information, production information, patents, formulas and designs, inventions, specifications, methods and methodology, production systems and processes, logistics and layouts, prices and costs, plans, drawings, documents, diagrams, models, samples, flowcharts, sketches, photographs, plans, industrial schematic drawings, equipment, computer programs, cd's, dvd's, pen's information about contracts, business plans, market opportunities, projects, opinions and research, Financial information, human and commercial resources, to which the employee has access:

By any physical means (eg documents, manuscripts, electronic messages (e-mail), photographs, etc.);

By any registered form (cd's, dvd's, pen's, external disks, etc.);

Orally.

Penalties

Failure to comply with any of the above mentioned confidentiality provisions will subject the offending employee to the payment, or replacement, of all losses and damages proven by the company, as well as the respective civil and criminal liability, which will be determined in a regular judicial process or administrative.



IV. Rules and Procedures

Working Hours

O horário de trabalho é de 8 horas diárias e de 40 horas semanais de 2ª a 6ª feira, com intervalo para almoço de 1 hora.

Breaking Hours

Morning Break: 10 minutes.

Afternoon Break: 5 minutes.

Appearance and Hygiene

Your appearance and hygiene are very important, taking into account the handling of the work pieces, as well as the type of machines or equipment, which can cause risks such as gripping, rolling or dragging, so you must pay attention to the following notes:

- Keep your hair tied up when working with machines;
- Do not wear jewelry, necklaces, bracelets, clothes with wide sleeves, etc. These things can cause serious accidents if they get caught in machines;
- Please use gloves (certain materials can react if in direct contact with the hands);
- Please use a working apron in good condition (provided by the company);
- For those who do not need to wear an apron, you must maintain a well-groomed appearance;
- Use a «Belcinto» badge with your name;
- It is not allowed to wear sandals or flip-flops, as a precaution against cuts or other injuries.



Workstation

Please use safety protections in the marked areas (earphones, mask, gloves, goggles. Ask it to the sector's responsables in case you don't have it).

You are responsible for the equipment that has been given to you.

Take advantage of materials and components when using it.

Employees who handle with machines, materials or/and components must check the technical and safety data sheets. Please keep the work area clean, report any malfunction, anomaly or modification.

Focus on **QUALITY**:

- Make it, check it and then move on to the next step with self-control.

Holidays

The worker has the right of two working days of holidays per each month of contract duration and, the right to the corresponding allowance. In our company, Holiday season is 22 working days that should be taken in the month of August and December. Please note this Holiday Schedule could change each year.

Meal allowance

O subsídio de alimentação é pago por cada dia de trabalho efetivo.

Reparation

Whenever the employees, in the course of their duties, makes mistakes and it is necessary to make the respective repair, they may ask the company to do it after working hours.



Compensation

Whether the employee hasn't working hours credit to compensate an absenteeism, the company provides the Justified Absence Form, which the employee should request to compensate the hours he/she owe to the company, fulfilling them after regular working hours, not being paid for that extra time, as he/she is replenishing missing hours.

V. Mess/ Social Facilities

Social Facilities

This area was created for all our workers to eat and drink. It is not allowed to drink or eat outside the Mess.

We appreciate you keep this area clean.

- We have microwave and bain-marie vat to heat up food.
- Please keep everything clean after the usage.
- Fridge is for everyone's use.
- Don't fill the entire fridge with personal stuff. Please keep it clean and organized.
- The kitchen sink is to wash the dishes and related. The kitchen sink is not for hand washing, there are service bathrooms for this purpose.

Please do not reserve seats. Everyone is/should be free to choose where to sit to have their meal.

Advertising and magazines – can be read during break times – after this period, please do not left it on work desks.

It's not allowed the sale of products inside the company's premises.



Bins – there are 4 bins with respective identification – please do not mix organic waste with recycling one.

VI. Hygiene and Safety at work

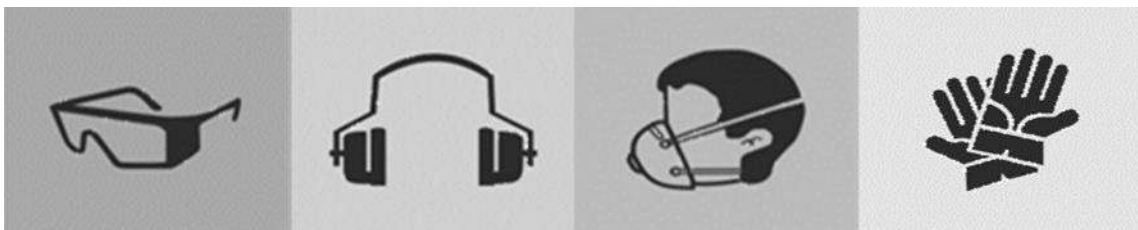
Safety at work

Safety is everyone's responsibility and must be a priority!

Our aim is to achieve the highest level of safety for our employees, and therefore we are most concerned with accident prevention, fire prevention and first aid measures. It will be everyone's responsibility to notify their supervisor or the human resources department of any situation that could be the cause of an accident.

The company analyzed the risks in the workplace, having identified a set of risks and defined a set of prevention and protection measures.

Please protect yourself using all the personal protective equipment (PPE) at your disposal:



Main Risks

- Mechanical hazards (cutting, drilling, crushing)
- Physical risks (exposure to equipment noise, visual fatigue)
- Chemical hazards (handling and exposure to chemicals, exposure to dust)



- Ergonomic risks (incorrect postures, repetitive movements)
- Psychosocial risks (stress, mental fatigue)

Respect

- Guidelines received or posted it
- The rules for using the equipment
- Maintenance and cleaning plans for facilities and equipment
- Organization of workplaces
- Prohibition, obligation and danger signs
- The defined circulation routes

Interdicted

- Trabalhar Working with equipment for which you are not trained.
- Intervening with the equipment without first putting it in safety, disconnecting it from the electrical current and with signs of intervention work, communicating any failure or anomaly to the person in charge.
- Obstructing/hiding the means of fighting fires or emergencies, escape routes and emergency exits with materials or objects.
- Smoking and consuming alcohol or drugs in the workplace.
- Working under the influence of alcohol or drugs.

Property Security

Any external movement that it seems strange or any suspicious attitudes must be reported to your responsible/manager.





Signage:

In our company there are several warning signs. Please do not remove them from their respective locations. If you find any that are damaged, please notify the person in charge.

EXAMPLES:

Hazard Warning Signal: The signs included in this category are intended to warn of a situation, object or action likely to cause damage or injury to people and/or to the facilities.



Flammable Substances or High temperature	Electrocution
	

Prohibition Warning Signs: The signs included in this category indicate that a certain behavior is likely to jeopardize the safety of an individual or the premises.

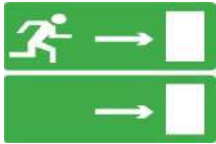

No Smoking	No smoking or naked flames
 	





Mandatory Sign: Signs included in this category are intended to prescribe a certain behavior.

Eye protection must be worn	Ear protection must be worn
	

Emergency sign: The signs included in this category are intended to indicate, in the event of danger, the emergency exits, the way to the first aid station or the place where there are rescue devices.

Emergency Exit	First Aid
	

Fire warning signs: This category are intended to indicate, in the event of a fire, the location of fire-fighting equipment available to the user.

Foam Spray	Fire Hose
	



VII. Medical Exams and First Aid

Medical Exams

The company has medicine at work, provided by an external entity.

All employees undergo a medical examination on admission to assess their physical capacity for the normal performance of their duties. They are subject to periodic examination once a year.

First Aid

The company has a team of rescuers, who provide first aid in the event of an accident. The rescuers are:

+	Cristina Ferreira	Administrative Department / Mess
+	Manuel Ferreira	Cutting Department
+	Albino Almeida	Cutting Department
+	André Neves	Cutting Department
+	Ana Paula Vieira	Assembly / Finishing / Packaging: Bags
+	Clarinda Martins	Assembly / Finishing / Packaging: Bags
+	Maria Clara Almeida	Assembly / Finishing / Packaging: Belts
+	Liliana Santos	Assembly / Finishing / Packaging: Belts
+	Daniel Neves	Warehouse / Sampling setor

In case of an accident during normal working hours, please contact your section manager and he will call one of these rescuers to provide you with first aid.

In the event of an emergency, anyone has the autonomy to **contact 112.** Wait for the operator to answer you and explain precisely the occurrence.



Fire

Our company has foam spray fire extinguishers placed throughout the different sectors.

We must be able to assess the risks of fire and, when in a concrete situation, try to eliminate or reduce it and inform the person in charge of the section.

Please keep electrical equipment in good condition and check it regularly, that is, check for frayed wires, loose parts, noise and inform the person in charge of the sector to help minimize the risks.

The emergency exits/doors are signposted, please keep them unobstructed.

Whether a fire breaks out and the alarm goes off, follow the instructions of the person who is in charge, leave your work station in an orderly manner and go to the exit closest to your work station. Outside, join your group at the meeting point and contact your supervisor to confirm your presence.

Please note the meeting points for each group are marked on the floor.





VIII. Environment

Environmental Management

Belcinto's commitment to minimizing environmental impacts and preventing pollution is evident in its management policy. Protecting the environment is everyone's responsibility and it aims to ensure the quality of life of future generations.

Energy (electricity, gas)

- Moderate/control energy consumption.
- Turn off lights that are not needed.
- Turn off equipment whenever possible.
- Do not leave doors and windows open in places where the air conditioning is in operation.
- Turn off computers, monitors and printers at the end of each day.
-

Waste Materials

- Minimize the waste produced: leather, rejected;
- Carry out a rigorous sorting of waste – organic, paper, plastics, metals...
- Chemical waste, electrical and electronic material, batteries, light bulbs, etc., must be separated.

Water/ Waste Water

- Save water when cleaning.
- Close all faucets tightly after using it.
- Use detergents in adequate doses – too much detergent does not mean better cleaning quality! Please be responsible.
- Identify and report detected water leaks.



IX. Complaints and Suggestions

Employees, whenever they intend to put a complaint/suggestion, they must fill in the respective form and place it in the box. The complaint form and the box can be found at the side entrance for employees.

This will be opened once a month by the administrative department, Joana Alves, or whoever is substituting her, who will give it to the Administration/Directors for follow-up according to the content of the suggestions/complaints.



Feedback is given on actions taken based on suggestions given by employees, quarterly.

x. Denunciations

In the event of an unethical and/or criminal complaint, there is a specific way for collecting this complaint. It can be done via email to denuncias@belcinto.com or personally by contacting Dr. Sílvia Duarte.

You can use one of the options above to report any situation that goes against our code of ethics and conduct.

All reports will be treated confidentially.



XI. Applicable Legislation to the Employment Contract

- Labor legislation approved by law 7/2009, 12/02/04.
- Collective employment agreement published in B.T.E nº30, 18/08/2016.

XII. General Information

Facilities Access

The entry to the company must be through the side door of the social part or in exceptional cases, through other door (to be designated).

Transport

If you travel in your own car, it must be parked in the company's general car park or in the outdoor public parking lot.

The company is not responsible for theft and/or damage caused to vehicles or objects inside them.



XIII. Company Name and Address:

Belcinto - Vasconcelos & Ca., Lda.

Rua Oliveira Figueiredo, 320 3700-202 / Apartado 99, Zona Industrial das

Travessas 3700-910 São João da Madeira, Portugal

Contacts:

Telephone: 256 203 020

Mobile Phone: 927 351 517

E-mail: belcinto@belcinto.pt

Comercial: ana.vasconcelos@belcinto.pt

RH: silvia.duarte@belcinto.pt



Part II

I. Code of Conduct

The code of conduct is a document of the utmost importance for BELCINTO – VASCONCELOS & CA., LDA., and for those who work here.

A code of conduct is a set of values, rules, standards, and principles outlining what employers expect from staff within an organization.

BELCINTO – VASCONCELOS & CA., LDA., assumes its social responsibility through the fulfillment of the following commitments:

- Support, respect and adopt a proactive attitude in the defense of human rights.
- Respect principles of equality and non-discrimination based on race, sex, politics or belief.
- Respect the right to freedom of opinion.
- Respect the right of parenthood.
- Respect the right to religious freedom.
- Respect the right to free association.
- Respect the principle of confidentiality and professional secrecy with all interested parties.
- Adopt a policy of complying with safety, hygiene and health at work standards.
- Adopt a good environmental practice policy.
- Promoting and supporting policies to defend the rights of children and young people.
- Ensure professional development, promoting training/education actions for its workers.
- Provide a safe work environment, free of any abuse, harassment or forced labor for all employees.



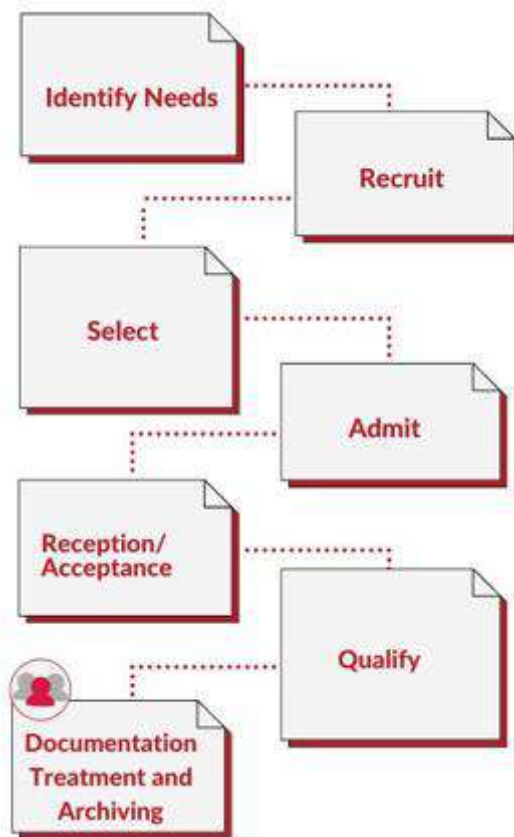
- Ensuring a conduct of good practices capable of influencing the partners who interact with you in the exercise of your activity.
- Publicly expose its Social Responsibility commitments.
- Refuse child labor.
- Refusing unsuitable remuneration practices with the function/category of the employee.



Part III

I. Recruitment Regulation

This aims to define the admission process of new employees, ensuring compliance with the applicable legal requirements and with the principles and commitments of social responsibility subscribed by Belcinto and is based on the following flowchart:



After identifying the needs, establishing the respective post profile, the recruitment process begins with:

- ✓ Footwear Industry Training Academy, with whom training partnerships are established;
- ✓ Employment Center;



- ✓ Other collaborators;
- ✓ Spontaneous applications,
- ✓ Ads and others.



The selection process is carried out in accordance with the principles of the code of conduct expressed herein, and in accordance with the law, namely:

- Candidates under the age of 18 are not considered for admission.
- No discrimination is made on the basis of race, national origin, social class, birth, religion, disability, gender, sexual orientation, family responsibilities, marital status, union membership, political opinion, or any other status that might give rise to discrimination.
- Once the selection analysis stage is completed, interviews are the next step. In the interviews, the questions asked are of a professional and technical nature in order to assess the candidate's skills and abilities. The results of the interview are recorded on a separate form and the final decision is always communicated to the candidate/applicant.
- The selected candidate will have a second interview scheduled where contractual conditions are communicated. If they are not accepted, the previous steps are repeated.
- Upon admission: the contract is signed by the respective worker and administration, the admission form is completed, and the exhibit of the following documents for internal data:
 - Citizen Card;
 - Curriculum Vitae, if applicable;
 - Copy of Driver's License and qualifications.
- You will be assigned a number, card to register your presence on the time clock, a lab coat and other tools necessary for your function.
- An appointment at the medicine services will be scheduled and the contract will be registered with Social Security.



Reception

- The worker is given a copy of this Social Manual, which he/she must read and sign a document committing to comply with it.
- • In the first few days, you will be introduced to the company's objectives, the work group you will be directly involved in, your duties and rights, as well as the specific dangers and risks of the tasks you will be carrying out.
- • The employee must sign the reception training record, showing that he/she was aware of the information communicated.
- At the end of the trial period established in the contract, a general assessment is carried out on the employee, which consists of:
 - Evaluate whether the worker knows what his responsibilities are, the tasks he/she performs and whether these suit his/her skills. **The result of the evaluation can be:**
 - Keep the employee;
 - Change the role employee;
 - Terminate the contract if it does not meet the necessary requirements;

The final decision is communicated to the worker.

Finally, the respective documentation is filed with the competent services.



Part IV

I. Security Policy

Within the scope of Health and Safety, it is the policy of VASCONCELOS & CA, LDA. to provide a safe and healthy work environment for their employees, through occupational safety and health prevention services, whose main objective is to reduce the incidence and prevention of accidents and occupational diseases.

In this sense, our fundamental principles are:

- ✓ Take an active role in the company's culture of prevention
- ✓ Comply with the legal, technical and other requirements applicable to our activity;
- ✓ Identify hazards and eliminate risk situations in a preventive manner;
- ✓ Involve the employees and stakeholders;
- ✓ Maintain appropriate records and information;
- ✓ Promote continuous improvement.

The Director,



Attachment I - B.T.E nº 30, 18/08/2016

CHAPTER X

Discipline

Clause 78.^a

(Disciplinary sanctions)

The employer may apply, within the limits set out in clause 80, the following disciplinary sanctions:

- a) Reprimand;
- b) Recorded reprimand;
- c) Pecuniary penalty;
- d) Loss of vacation days;
- e) Suspension of work with loss of remuneration and seniority post;
- f) Resignation without indemnity or any compensation.

Clause 79.^a

(Proportionality)

The disciplinary sanction must be proportionate to the seriousness of the infraction and the culpability of the offender, not being able to apply more than one for the same infraction.



Clause 80.^a

(Limits to disciplinary sanctions)

- 1- The pecuniary sanctions applied to the worker for infractions committed on the same day cannot exceed one third of the daily remuneration and, in each calendar year, the remuneration corresponding to thirty days.
- 2- The loss of vacation days cannot jeopardize the enjoyment of 20 working days of vacation.
- 3- The suspension of work cannot exceed 12 days for each infraction and, in each calendar year, a total of 30 days.

Clause 81.^a

(Aggravation of disciplinary sanctions)

The sanctions referred to in clause 78 may be aggravated by the respective disclosure within the company.

Clause 82.^a

(Disciplinary procedure and prescription)

- 1- The right to use a disciplinary sanction prescribes one year after the commission of the infraction, or within the limitation period of criminal law if the fact also constitutes a crime.
- 2- The disciplinary procedure must start within 60 days after the employer, or the hierarchical superior with disciplinary competence, became aware of the infraction.
- 3- The disciplinary procedure prescribes after one year from the date on which it is initiated when, within that period, the public employee is not notified of the final decision.



- 4- Disciplinary power may be exercised directly by the employer, or by the worker's hierarchical superior, under the terms established by the former.
- 5- Once the disciplinary procedure has started, the employer may suspend the employee if his presence proves to be inconvenient, maintaining the payment of the remuneration.
- 6- The disciplinary sanction cannot be applied without a prior meeting with the employee.
- 7- Without prejudice to the corresponding right of legal action, the worker may complain to the hierarchically higher level, or resort to the dispute resolution process when provided for by law.

Clause 83.^a

(Criterion for decision and application of a disciplinary sanction)

- 1- A The disciplinary sanction must be proportional to the seriousness of the infraction and the culpability of the offender, not being able to apply more than one for the same infraction.
- 2- 2- The employer must give to the responsible for the financial management of the Social Security budget the amount of the pecuniary penalty applied.
- 3- to the service responsible for the Financial management of the Social Insurance budget the amount of the pecuniary penalty applied.

Clause 84.^a

(Sanction Application)

The application of the sanction can only take place within three months following the decision.



Clause 85.^a

(Abusive Sanctions)

1. It is considered abusive the disciplinary sanction motivated by the fact that the employee:
 - a. Having legitimately complained about the working conditions;
 - b. Refusing to comply with orders to which he/she should not obey, under the terms of paragraph d) of number 1 and number 2 of clause 11;
 - c. Exercise or apply for functions in a representing workers organizations
 - d. In general, exercise, have exercised, intend to exercise or invoke the rights and guarantees that assist them.

2. It is considered abusive the dismissal or application of any sanction under the appearance of punishment for another fault when it takes place up to six months after any of the facts mentioned in paragraphs a), b) and d) of the previous number.

Clause 86.^a

(General consequences of applying an abusive sanction)

1. The employer who applies any abusive sanction in the cases provided for in the paragraphs of number 1 of the previous clause is obliged to indemnify the worker in general terms, with the changes contained in the following numbers.
2. If the sanction gives the right to dismissal, the employee has the right to choose between reinstatement and compensation calculated in the same way as provided in numbers 1 and 3 of clause 104^a.



3. The employer who applies any abusive sanction in the case provided in paragraph c) of number 1 of the previous clause, must compensate the employee in the following terms:
 - a. The minimums fixed in the previous number are increased to doubled;
 - b. In case of dismissal, compensation is never less than the base salary and length of service corresponding to 12 months.

Clause 87.^a

(Registration of disciplinary sanctions)

The employer must keep a record of disciplinary sanctions, made in a way that allows the easy verification of compliance with the applicable provisions, namely by the competent authorities that request its consultation.



REMARKS

Lined area for writing remarks, consisting of 25 horizontal lines.