Sonaecom
Sonae

Plan for Equality

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Introductory Note

Gender equality is a right established by the 13rd article of the Portuguese Republic's Constitution, regarded as an essential human right for society's development and for the full participation of men and women as individuals.

The concept of gender equality translates as an equality of rights, liberties and opportunities for men and women with the goal of providing equal valorisation, recognition and participation in all spheres of public and private life.

This is a concept that has been given particular attention and relevance by the main international entities over the last years and that has also recently gained greater prominence in Portugal.

The Resolution No. 19/2012 of the Council of Ministers, held on the 8th of March of 2012, firstly stipulated the obligation of adopting a plan for equality in every organisation of the Government's business sector, oriented towards reaching the equality of treatment and opportunities between genders, eliminating discrimination and facilitating the balance between personal, professional and family life.

This obligation was later extended to companies listed on the stock market, through the Law No. 62/2017 of the 1st of August, which approves the regime of balanced representation between genders for the boards of directors and supervisory boards of public and listed companies, stipulating in 7th article the obligation to elaborate and communicate annual plans for equality.

The Law No. 62/2017 also came to establish representation quotas for both genders of 20% for companies listed on the stock market, from the first elective general meeting which occurs after the 1st of January of 2018, and 33,3% from the first elective general meeting which occurs after the 1st of January of 2020, regarding all board members (executive and nonexecutive).

Considering the relevance of the contribution of business organisations for a fully democratic and inclusive society, as well as the relevance of diversity, particularly of gender, for the balance and development of its businesses, Sonaecom, SGPS, S.A. (hereinafter referred to as "Sonaecom" or "Society" has dedicated special attention to this issue, seeking to balance the representation of male and female individuals throughout the Society, with a special focus on leadership roles.

Additionally, Sonaecom as an entity included at Sonae Group (being controlled by Sonae – SGPS, S.A., further referred as "Sonae" and/or "Group"), participates in the initiatives promoted by the Group on this matter.

Therefore, and under the terms of article 7 of the Law no. 62/2017, the 1st of August of 2017, Sonaecom has been drawing up annual plans aimed at promoting good practices within the scope of gender equality, applicable both to its employees and members of company bodies, committing to its implementation, monitoring and constant improvement.

In this document, a comprehensive self-assessment about gender equality at Sonaecom will be presented, as well as an overview of the measures already deployed and undergoing and the plan for 2025.

Regarding its scope, the present plan, cover all companies fully owned, directly or indirectly, by, thus this is being applied to all the employees and members of the governing bodies.

Regarding the controlled and co-controlled companies, Sonaecom, as a direct or indirect shareholder, will undergo its best efforts in order to guarantee the policy's application.

Self-assessment – “Understanding Equality at Sonaecom SGPS, S.A.”

With the view of furthering a comprehensive assessment of Sonaecom current situation regarding gender equality, contributors from sources were considered, namely:

- Guide to preparing equality plans, published by the Commission for Equality in Work and Employment (“CITE”);
- Self-assessment tool available on the CITE website - https://planosigualdade.cite.gov.pt/;
- Detailed analysis of the strategic human resources management cycle, which follows the different stages of employees’ life cycle;
- CITE’s recommendations arising from the technical analysis of the plan published by Sonaecom in September 2023;
- Monitoring indicators evolution, targets and commitments signed.

The combination of these contributions made it possible to incorporate into this plan the internal assessment of Sonaecom’s current situation, as well as the external perspective of CITE and factual data that help to objectively assess the Company’s position in terms of gender equality, identifying strengths and improvement opportunities to develop. The indicators reported in this assessment date from 30th of June of 2024.

Self-assessment results as well as the plan made available on the CITE platform reveal Sonaecom maturity and commitment to gender equality.

In order to support the plan presented in this document, the most relevant elements of this self-assessment are highlighted.

A. Strategy, Mission and Values of the Company

The first component of the self-assessment process carried out by Sonaecom was directed to the analysis of the business practices in terms of diversity and inclusion, especially in what regards to the gender equality, in light of the organisation's strategy, identity and culture vectors, sustained by their formal supporting documentation.

In this regard, it should be noted that Sonaecom places a high emphasis on diversity, which, definitely, is one of the structural vectors of its success.

The commitment to diversity in assumes a prominent role in ensuring that it actively seeks to encourage inclusion throughout the organisation, managing and evaluating its employees in an unbiased management and through the promotion of equal opportunities for everyone, regardless of their role and position within the organisation, as well as gender, ethnic group, age, religion or sexual orientation.

The values of inclusion and diversity are an integral part of Sonaecom matrix since its genesis, being intrinsically related with the evolution, growth and diversification of its businesses. Historically, Sonaecom has sought to encourage these values through the proactive and recurring development of a set of initiatives.

In parallel, Sonaecom has been systematically following the evolution of a wide range of indicators that, among other goals, aim to feed the discussion regarding the inclusion and diversity in the company's planning and management forums.

Specifically, regarding the gender equality, Sonaecom SGPS, S.A. has been acting in several strategic lines, emphasizing its investment in the development of its talents, through an approach which aims the sustainability concerning the gender balance.

The commitment to gender equality is also reflected in the Sonae Group values and principles that guide the way of being in life and business, designated “our way”, with emphasis on:

- **Lead for impact** – “We turn ambition into action. This means we strive to have a meaningful impact today and tomorrow.”
- **Own what’s next** – “We act as intrapreneurs first and foremost. This means we challenge the status quo and drive what’s next.”
- **Go further together** – “We champion our diverse talent. This means we bring our skills, knowledge, and point of views to learn from one another and put it into action.”
- **Make things simple** – “We move fast and keep things simple. This means we are continuously improving to be more efficient, adaptive, and nimble.”
- **Do what’s right** – “We commit to doing good business. This means we act independently and transparently to make the right choices.”

In relation to gender diversity, Sonaecom seeks to promote it throughout the entire life cycle of its employees.

With the ambition of being able to face each of its people in its own unique way, Sonaecom promotes an integrated and inclusive management of human resources based on three distinct pillars: attract; develop and retain diverse and distinctive profiles.

B. Equal Access to Employment

B.1. Advertisements, selection and recruitment

Sonaecom invests in identifying and attracting people with varied academic, professional and personal backgrounds, bearing in mind the principle of equality and non-discrimination based on gender in the recruitment and selection processes. Throughout the professional career, it is sought that this diversity of profiles and characteristics are enhanced and strengthened at all corporate levels, so that employees can be better prepared to respond to the multiple challenges that the business imposes.

B.2. Trial Period

During the trial period of the employment contracts, Sonaecom appreciates the performance of each employee and evaluates the effective interest in their maintenance.

C. Initial and Continuous Training

Sonaecom assures that employees’ training covers different functions, generations and geographies, and is accessed by all employees in an equitable way. In this process, an increasingly active role is attributed to the employee, who is given the opportunity to decide the themes and competences considered most relevant to the employee’s development. All employees are given the opportunity to apply to any training.

The training plans are developed always bearing in mind the principle of equality and non-discrimination between women and men, seeking to ensure equally balanced representation in all training initiatives undertaken

D. Equal Working Conditions

D.1. Performance Evaluation

Gender equality is one of the pillars of the talent management model and an area of constant investment. Essential to develop employees personally and professionally and, at the same time, enhance the amplification of the necessary skills for business development. We live a meritocracy culture, where the differentiation of performance and contribution of people and teams is supported by processes and tools of recognition.

The quantitative and qualitative weights used in performance appraisal are equally applied to roles performed by women and men.

D.2. Promotion/ Progression on professional career

The progression of the professional career aims to align employees personal and professional expectations with the business's strategic objectives, guiding the organisation's behaviour by the principle of gender equality. Through the career model we seek to support the management of the current talent flow and to respond to medium/long term needs and challenges, as well as the reconciliation of work, family and personal life/ work organisation, organisational climate and internal and external communication..

D.3. Wages

Sonaecom's wage policy is guided by the best market practices. Such salary scales, which contain the reference amounts to be paid to a specific role are free of any gender discrimination, are regularly revised accordingly with market salary competitiveness studies, for comparable roles in the different geographies and sectors of activity in which its subsidiaries operate.

E. Parental Rights Protection

Sonaecom fully complies with all the legal rights provided for employees in relation to parenting, namely regarding benefit from leave of absence, leave, reduced working time, training for reintegration and protection mechanisms for pregnant, postpartum or lactating workers.

F. Balance Between Professional, Family and Personal Life

Sonaecom promotes the balance between work, family and personal life through an active investment in practices that enhance it, using non-discriminatory and gender-inclusive language and image, addressing equally to all employees.

In this context, the focus is on the provision of protocols with educational institutions for our employees' children and the organisation of events to engage and celebrate the family, particularly at Christmas.

Promoting maternity, paternity and family care is also one of Sonaecom areas of active investment. Providing information on parenting rights and duties, encouraging parents to actively participate in

family life, as well as providing a greater flexibility in the organisation of working times and creating conditions for remote work, are some examples of this investment.

It is also important to highlight another relevant sphere of action of Sonaecom S.A., which relates to the promotion of workers' health and well-being, that is immediately available in the company, like the provision of closeness and health and well-being services in the facilities, as well as the structure of benefits of the group - Mais Sonae - which aims to provide a range of benefits and advantages for the employees, through a broad network of partners in various spheres of activity.

To ensure that employees have access to solutions that help them better balance their professional, family, and personal lives, while considering the specific needs of each business, the Company adopts the work models that best fit its context. Among the various models implemented are the 100% in-person format, for those who prefer it or for roles that cannot be performed remotely, as well as the hybrid model, which combines remote work days with in-person work days.

G. Prevention of Sexual Harassment At Work

The preservation of the physical and psychological integrity of all who perform their activities in the Sonaecom universe is a permanent concern, not only of those who perform management or administration roles at the Company, but also of the professionals who render services to it, without exception.

In this sense, and in line with its values and with the provisions of its Code of Ethics and Conduct, Sonaecom has adopted and has implemented a code of good conduct in matters of prevention and reaction to harassment at work, applicable to all companies of the Sonaecom Group, which integrates a set of principles, procedures and commitments in order to identify the phenomenon and actively contribute to the prevention, combat and elimination of all behaviours that may cause it.

H. Organisational Climate

Sonaecom periodically consults employees, in order to know their opinion regarding a set of dimensions considered relevant to their satisfaction and commitment, which can be analysed considering the gender diversity. In addition, it conducts focus groups in order to deepen the feedback gathered and, at the same time, to obtain the active contribution of the employees in the development of new initiatives that allow the mitigation of aspects referred to as less positive and, simultaneously, the enhancement of the points signalled as positive.

I. Internal and External Communication

Sonaecom establishes its communication on inclusive and non-discriminatory language in the promotion of activities or even in the relationship with the employees.

Regarding internal communication, Sonaecom joined the "All in for Gender Equality" initiative created in 2020 at Sonae Group aiming to strengthen the importance and awareness of the gender equality topic in all employees. The Company has published the Plan for Gender Equality on its website and its strategic documents (such as the "Corporate Governance Report" and the "Code of Ethics and Conduct") which expressly mention the Company's concerns with gender equality and non-discrimination between women and men.

J. Subscribed Indicators

In this regard and in order to ensure a more complete reading of the organisation's status quo, supporting the self-diagnosis carried out, some key metrics were systematised regarding the current sex distribution in the organisation.

Statistical data on sex in Sonaecom SGPS, S.A. Portuguese labour context, based on the information collected on the 30th of June of 2024, translate as follows:

	Women	Men	Total
STRATEGIC-TACTICAL LEVEL	33.3% (2023 34.4%)	66.7% (2023 65.6%)	10.1% (2023 9.6%)
OPERATIONAL LEVEL	55.8% (2023 54.3%)	44.2% (2023 45.7%)	89.9% (2023 90.4%)
TOTAL	53.5% (2023 52.4%)	46.5% (2023 47.6%)	

	Women	Men	Total
EFFECTIVES	53.7% (2023 52.1%)	46.3% (2023 47.9%)	94.5% (2023 93.7%)
INTERNSHIPS AND TERM CONTRACTS	50.0% (2023 57.1%)	50.0% (2023 42.9%)	5.5% (2023 6.3%)
TOTAL	53.5% (2023 52.4%)	46.5% (2023 47.6%)	

Analysing the current context of the Sonaecom Group, we find that, at the strategic level, most of the functions are performed by males (66.7%), therefore females are underrepresented. At the operational level, most of the functions are performed by females (55.8%), therefore men are underrepresented.

Regarding the employment relationship, in Sonaecom's total permanent workforce, in line with the total population the percentage of women is slightly higher (53.7%) than men (46.3%).

Generally, there was a slight increase of women since last year, from 52.4% (2023) to 53.5% (2024).

The following table shows the distribution by sex based on age breakdown:

	Women	Men	Total
TILL 25	65.0% (2023 52.2%)	35.0% (2023 47.8%)	6.1% (2023 6.9%)
26-35	51.2% (2023 50.5%)	48.8% (2023 49.5%)	25.1% (2023 27.2%)
36-55	52.1% (2023 51.8%)	47.9% (2023 48.2%)	51.1% (2023 50.3%)
+55	56.9% (2023 57.7%)	43.1% (2023 42.3%)	17.7% (2023 15.6%)
TOTAL	53.5% (2023 52.4%)	46.5% (2023 47.6%)	

However, it should be noted that the activities carried out by the Sonaecom's subsidiaries include mainly technical areas related to Science, Technology, Engineering and Mathematics, where the number of graduated females is typically lower than the number of graduated males. And another area of Media, where, in general, there is a greater balance between female and male graduates. It is also important to point out that the distinction between strategic-tactical and operational levels in media/journalism careers does not exist and they are all considered in the operational layer, so hence, the greater balance between male and female in media does not translate directly into the strategic-tactical layer.

Plan For Equality – “From diagnosis to implementation”

The diagnosis and self-assessment carried out made it possible to objectively define the current position of the Society, enabling the identification and definition of a multi-level intervention plan, focusing on people management policies, leaderships responsible for its execution and the monitoring of its implementation, in the way to promote good practices in the gender equality matter.

In this context, the Company details below the measures that have already been implemented, which, nonetheless, require continuous monitoring and proper updates whenever necessary:

LEVEL	MEASURE	IMPLEMENTATION STATUS	TEAM(S) RESPONSIBLE	TEAM(S) INVOLVED	INDICATORS
COMPANY STRATEGY, MISSION, AND VALUES	Listening to employees from different organizational levels, to assess perceptions of different dimensions of gender equality in the organization, including the balance between professional, family, personal life and parenting protection.	Implemented	Sonaecom’ Human Resources	Subsidiaries’ Human Resources	Evidence of the internal reports with analysis of feedback collected.
	Provide the gender equality plan in an internal location with recognized visibility.	Implemented	Sonaecom’ Human Resources	Subsidiaries’ Human Resources	Evidence of plan disclosure.
	To foster partnerships and commitments with external entities regarding the promotion of equality between women and men referred to in the self-diagnosis section.	Implemented	Sonaecom’ Human Resources	Subsidiaries’ Human Resources	Evidence of the partnerships and commitments created.
	Creation of the strategic KPI – Women in leadership – aiming to increase women representation in leadership roles and tracking its evolution.	Implemented	Sonae HRAG	Subsidiaries’ Human Resources and management teams	Evidence of the biannual dashboard to monitor the evolution of indicator.
EQUAL ACCESS TO EMPLOYMENT	Ensure that the recruitment and selection criteria incorporate the principle of equality and non-discrimination based on gender, through a straightforward and transparent way.	Implemented	Subsidiaries’ Human Resources	Sonaecom’ Human Resources	Evidence of the periodic analysis of recruitment processes (by sampling).
	Explain the principles of gender equality in relevant employer branding actions. Continuously promote diversity in attracting and retaining talent.	Implemented	Subsidiaries’ Human Resources	Sonaecom’ Human Resources	Evidence of the employer branding initiatives made.
INITIAL AND CONTINUOUS TRAINING	Include in the annual training plan specific gender equality modules, incorporating this concern in the development of general and specific training. Ensure that the balance between the personal and family life for each employee is respected, when scheduling any training actions.	Implemented	Sonaecom’ Human Resources	Subsidiaries’ Human Resources	Evidence of the training contents made available. Since 2022, 17 employees (9 female and 8 male) have participated in Unconscious Bias training.
PARENTAL PROTECTION	Granting gift cards in certain companies within the group to male and female	Implemented	Sonaecom’ Human Resources	Subsidiaries’ Human Resources	

LEVEL	MEASURE	IMPLEMENTATION STATUS	TEAM(S) RESPONSIBLE	TEAM(S) INVOLVED	INDICATORS
	employees who have become parents, as a way to enhance the package of benefits provided within the framework of parental support.				Evidence of the provided benefits. Since 2023, 4 gift cards have been given out (2 to females and 2 to males).
EQUAL WORKING CONDITIONS	Provide training to all employees on performance evaluation, with particular relevance to the theme of non-discrimination, making available information on the implemented model.	Implemented	Subsidiaries' Human Resources	Sonaecom' Human Resources	Evidence of the training contents made available.
	Promote equality between women and men in the field of career progression and professional development by ensuring that their competences are equally recognized in the promotion and career promotion processes, by encouraging succession plans that include a diverse pipeline of potential candidates.	Implemented	Sonaecom' Human Resources	Subsidiaries' Human Resources and management teams	Evidence of the competencies assessment, per gender, performed during salary review, promotion and talent pipeline processes.
	Foster the gender representation in leadership positions, in line with commitments already established and the participation in sharing networks that promote equal visibility and access to top management for the different genders.	Implemented	Sonaecom' Human Resources	Subsidiaries' Human Resources and management teams	Evidence of the competencies assessment, per gender, performed during salary review, promotion and talent pipeline processes.
	Monitor the competitiveness of compensation arrangements in comparison with the market and periodically analyze the gender pay balance that performs similar functions, looking for corrective solutions, when appropriate.	Implemented	Sonaecom' Human Resources	Subsidiaries' Human Resources	Evidence of the competencies assessment, per gender, performed during salary review process.
BALANCE BETWEEN PROFESSIONAL, FAMILIY AND PERSONAL LIFE	Foster the adoption of flexiwork practices by creating conditions for remote work, flexible hours and new forms of work organization.	Implemented	Subsidiaries' Human Resources	Management teams and IT teams	Evidence of the practices made available and their communication.
	Promote remote work, in a partially format, in order to enable employees to better manage their work-life balance.	Implemented	Subsidiaries' Human Resources	Management teams and IT teams	Evidence of the practices made available and their communication.

In addition to the measures already implemented and based on the guidelines shared by CITE, the implementation of the following measures is considered a priority:

LEVEL	MEASURE	OBJECTIVES	IMPLEMENTATION STATUS	TEAM(S) RESPONSIBLE	TEAM(S) INVOLVED	INDICATORS	GOALS	BUDGET
COMPANY STRATEGY, MISSION, AND VALUES	Define and monitor measurable strategic objectives for the promotion of gender equality. Continuity of the work and monitoring the disaggregation of all data by gender in all company management tools, including diagnoses and reports.	Ensure the implementation of the updated version of the Equality Plan, its monitoring, follow-up, and sustainability.	Ongoing	Sonaecom' Human Resources	Subsidiaries' Human Resources	Evidence of the activities carried out.	Internal procedure created and implemented.	Internal costs related to human resources allocated to the project.
	Development and implementation of awareness initiatives, that prepare leaders to manage teams diversity and gender equality, within the "Sonae All in for Gender Equality" initiative created at the Sonae group level.	Prepare the leaders to manage team diversity and gender equality.	Ongoing	Sonae HRAG and Sonaecom' Human Resources	Subsidiaries' Human Resources and management teams	Evidence of events promoted by internal or external influencers.	Participation of all leaders in awareness and consciousness-raising actions.	No estimated costs.
	Establishment of mentorship, , counceling and coaching initiatives that contribute to the development of new skills and, consequently, lead to a more balanced participation of men and women in leadership roles, within the scope of "Sonae All in for Gender Equality" program launched at the Sonae group level.	Ensure a more balanced participation of men and women in leadership positions.	Ongoing	Sonae HRAG and Sonaecom' Human Resources	Subsidiaries' Human Resources	Evidence of the mentoring circles for discussion, training and guidance performed.	Participation of all leaders in the developed initiatives.	No estimated costs, in the short time.
INITIAL AND CONTINUOUS TRAINING	Inclusion of training on unconscious bias in training programs.	Mitigate the risk of unconscious bias in hiring and people management processes.	In progress	Sonae and Sonaecom' Human Resources	Subsidiaries' Human Resources	Evidence of training records.	Making the training available to all employees.	Costs related to training to be determined on a case-by-case basis.
PATERNITY CONDITIONS	Ensure that employees who have been absent for extended periods due to parental leaves have a facilitated reintegration process, through mentoring, training, or other necessary initiatives.	Encourage employees to take parental leave.	Ongoing	Sonaecom' Human Resources	Subsidiaries' Human Resources	Evidence of activities carried out to facilitate reintegration.	All employees returning to work after a break are eligible for support.	Costs related to the developed actions, to be determined on a case-by-case basis.

The execution of the plan is subject to a systematic monitoring process in order to follow-up its implementation, the efficiency of activities and the accomplishment of ita goals. For this purpose, the work group including members of the human resources and legal directions, who report to the board of directors will continue to take an active role in promoting, raising awareness and monitoring improvement actions.

Additionally, related with the initiatives that are developed at a Sonae Group level, Sonae's Human Resources Advisory Group (HRAG) conducts an additional debate, follow-up and monitoring of the impact of each initiative. Sonaecom is also represented in this forum.

To conclude, we should point out that Sonaecom similarly to what has been done, will continue to pursue an active role in the field of gender equality, recognising its importance, and acting as a capable promoter, positively influencing the different stakeholders, driving a systemic change in the current gender equality paradigm.