



Plan for Equality

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Introductory Note

Gender equality is a right enshrined in Article 13 of the Constitution of the Portuguese Republic and is regarded as an essential human right for the development of society and the full participation of women and men as individuals.

The concept of gender equality means equality of rights, freedoms and opportunities between women and men, with the aim of ensuring equal value, recognition and participation in all spheres of public and private life.

This concept has received particular attention from the main international institutions in recent years and has also recently gained formal prominence in Portugal.

Resolution of the Council of Ministers No. 19/2012, of 8 March 2012, initially established the obligation to adopt an equality plan in all entities in the State-owned business sector, aimed at achieving equal treatment and opportunities between genders, eliminating discrimination and facilitating the balance between personal, family and professional life.

This obligation was subsequently extended to listed companies by Law No. 62/2017, of 1 August, which approved the regime for balanced representation between genders on the management and supervisory bodies of public-sector entities and listed companies. Article 7 of the Law establishes the obligation to prepare and publish annual equality plans.

Law No. 62/2017 also established representation quotas for women and men on the management and supervisory bodies of listed companies: 20% from the first elective general meeting held after 1 January 2018, and 33.3% from the first elective general meeting held after 1 January 2020, considering all directors, both executive and non-executive.

Considering the importance of the contribution made by business organisations to a fully democratic and inclusive society, as well as the relevance of diversity, particularly gender diversity, to the balance and development of their businesses, Sonaecom, SGPS, S.A. (hereinafter referred to as “Sonaecom” or the “Company”) has devoted particular attention to this matter, seeking to balance the representation of women and men throughout the organisation, with a particular focus on leadership roles.

In addition, Sonaecom, as an entity within the Sonae Group (and an entity controlled by Sonae – SGPS, S.A., hereinafter referred to as “Sonae”), actively participates in the initiatives promoted by the Group in this area.

Accordingly, pursuant to Article 7 of Law No. 62/2017, of 1 August 2017, Sonaecom has prepared annual plans aimed at promoting good practices in gender equality, applicable both to its employees and to the members of its corporate bodies, and is committed to their ongoing implementation, monitoring and improvement.

This document presents a self-assessment of gender equality at Sonaecom, a review of the measures implemented to date and currently under way, and the plan for 2027.

Regarding its scope, this plan covers all companies wholly owned, directly or indirectly, by Sonaecom and applies to all employees and members of the corporate bodies.

With regard to controlled and jointly controlled companies, Sonaecom, as a direct or indirect shareholder, will use its best efforts to promote its application.

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

To carry out a comprehensive self-assessment of Sonaecom’s current position regarding gender equality, contributions from several sources were considered, namely:

- Guide for the preparation of equality plans, published by the Commission for Equality in Labour 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, covering the different stages of the employee life cycle;
- Monitoring the development of indicators, targets and commitments undertaken.

The combination of these contributions made it possible to incorporate into this plan Sonaecom’s internal assessment of its current position, CITE’s external perspective, and factual data that help to assess the Company’s position on gender equality objectively, identifying strengths and opportunities for improvement. The indicators reported in this assessment are dated 30 June 2026.

The results of the self-assessment, together with the plan made available on the CITE platform, demonstrate Sonaecom’s maturity and commitment to gender equality.

The most relevant elements of this self-assessment are highlighted below to support the plan presented in this document.

A. Company Strategy, Mission and Values

The first component of Sonaecom’s self-assessment process analysed business practices in diversity and inclusion, particularly gender equality, in light of the organisation’s strategy, identity and culture, supported by the corresponding formal documentation.

In this regard, it is important to note that Sonaecom places strong emphasis on diversity, clearly identifying it as one of the structural drivers of its success.

Sonaecom’s commitment to diversity therefore plays a prominent role. The Company seeks to uphold it by actively encouraging inclusion throughout the organisation, managing and assessing employees impartially and promoting equal opportunities for everyone, regardless of their role and organisational position, gender, ethnicity, age, religion or sexual orientation.

The values of inclusion and diversity have been an integral part of Sonaecom’s identity since its inception and are intrinsically linked to the evolution, growth and diversification of its businesses. Historically, Sonaecom has sought to encourage these values through the proactive and recurring development of a range of initiatives.

At the same time, Sonaecom has systematically monitored a broad range of indicators that, among other objectives, are intended to inform discussions on inclusion and diversity in the Company’s planning and management forums.

In particular, regarding gender equality, Sonaecom has acted across several strategic areas, emphasising its investment in talent development through an approach aimed at ensuring sustainable gender balance.



The commitment to gender equality is also reflected in the Sonae Group's values and principles, which guide its approach to life and business and are known as "our way". These include:

- Lead with impact – "We turn ambition into action. We strive to have a meaningful impact today and tomorrow."
- Own what's next – "We act as entrepreneurs first and foremost. We challenge the status quo and drive what's next."
- Go further together – "We champion our diverse talent. 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. We are continuously improving to be more efficient, adaptive, and nimble."
- Do what's right – "We commit to doing good business. We act independently and transparently to make the right choices."

With regard to gender diversity, Sonaecom seeks to promote it throughout the entire employee life cycle.

With the ambition of recognising each person's individuality, Sonaecom promotes integrated and inclusive human resources management based on three distinct pillars: attracting, developing and retaining diverse and distinctive profiles.

B. Equal Access to Employment

B.1. Job advertisements, selection and recruitment

Sonaecom invests in identifying and attracting people with varied academic, professional and personal backgrounds, while observing the principle of equality and non-discrimination based on gender in recruitment and selection processes. Throughout their professional careers, the Company seeks to enhance and strengthen this diversity of profiles and characteristics at all corporate levels, so that employees are better prepared to respond to the many challenges faced by the business.

B.2. Trial Period

During the initial period of employment contracts, Sonaecom assesses each employee's performance and evaluates whether there is an effective interest in continuing the employment relationship.

C. Initial and Continuous Training

With regard to training, access is ensured across the entire Company on a cross-functional and equitable basis, covering different roles, generations and geographies. In this process, employees are given an increasingly active role, with the opportunity to decide which topics and skills they consider relevant to develop and to enrol independently.

Training plans are always developed with the principle of equality and non-discrimination between women and men in mind, while also seeking to ensure balanced representation in all training initiatives.



D. Equal Working Conditions

D.1. Performance Evaluation

Gender equality is one of the pillars of the talent management model and an area of continuous investment. It is essential to employees' personal and professional development and, at the same time, to strengthening the skills required for business development. Sonaecom fosters a culture of meritocracy, in which differentiation in the performance and contribution of people and teams is supported by recognition processes and tools.

The quantitative and qualitative weightings used in performance evaluations are applied in the same way to roles performed by women and men.

D.2. Promotion and Professional Career Progression

Professional career progression aims to align employees' personal and professional expectations with the strategic objectives of the business, with the organisation's conduct guided by the principle of gender equality. Through its career model, Sonaecom seeks to support the management of its current talent pipeline and respond to medium- and long-term needs and challenges, as well as matters relating to work-life balance, work organisation, organisational climate, and internal and external communication.

D.3. Pay

Sonaecom's pay policy is guided by market best practices. Salary scales, which set out reference amounts by role, are free from any form of discrimination based on sex and are reviewed in accordance with market pay competitiveness studies for comparable roles in the various geographies and business sectors in which the companies operate.

E. Parental Protection

Sonaecom fully complies with all statutory parental rights applicable to employees, particularly regarding parental leave, time off and absences, reductions in working time, training for professional reintegration, and protection mechanisms for pregnant, postpartum or breastfeeding workers.

F. Balance Between Professional, Family and Personal Life

Sonaecom promotes a balance between professional, family and personal life by actively investing in practices that support it, addressed to all employees and communicated using non-discriminatory and inclusive language and imagery.

In this context, particular emphasis is placed on agreements with educational institutions for employees' children and on events designed to involve and celebrate families, particularly at Christmas.

Promoting maternity, paternity and family care is also one of Sonaecom's areas of active investment. Providing information on parental rights and responsibilities, encouraging fathers to participate actively in family life, providing flexibility in the organisation of working time, and creating conditions for remote work are examples of this investment.



It is also important to highlight another relevant area of the Company's activity: promoting employees' health and well-being. This includes the provision of on-site convenience services and health and well-being services on its premises, as well as the Group's benefits and advantages programme – "Mais Sonae" – which provides employees with a range of benefits and advantages through a broad network of partners across different areas of activity.

To ensure mechanisms that support employees in balancing their professional, family and personal lives, and taking into account the specific characteristics of each business, the Company adopts the working models best suited to its context. The models implemented include a fully on-site arrangement – for roles that require it or for those who prefer it – and a hybrid arrangement combining remote and on-site working days.

G. Prevention of Harassment at Work

Preserving the physical and psychological integrity of everyone who works within Sonaecom is an ongoing concern, not only for those who perform management or leadership roles in the Company, but for all professionals who provide services to it, without exception.

Accordingly, and in line with its values and the provisions of its Code of Ethics and Conduct, Sonaecom has adopted and implemented a code of good conduct on the prevention of and response to harassment at work. It applies to all companies in the Sonaecom Group and includes a set of principles, procedures and commitments designed to identify the phenomenon and actively contribute to preventing, combating and eliminating all conduct that may constitute harassment.

H. Organisational Climate

Sonaecom periodically consults employees to understand their views on a set of dimensions considered relevant to their satisfaction and commitment. It also conducts focus groups to explore the feedback collected in greater depth and obtain employees' active contribution to the development of new initiatives that mitigate aspects identified as less positive while expanding those identified as positive.

I. Internal and External Communication

Sonaecom uses inclusive and non-discriminatory language when promoting its activities and in its relationship with employees.

At the internal communication level, Sonaecom joined the 'All In for Gender Equality' programme, created within the Sonae Group in 2020, which aims to reinforce the importance of gender equality among employees and raise awareness of the value of their involvement in this area.

The Company publishes its Gender Equality Plan on its website, and its strategic documents, such as the Corporate Governance Report and the Code of Ethics and Conduct, expressly refer to the Company's commitment to equality and non-discrimination between women and men.

J. Key Indicators

To provide a more complete picture of the organisation's status quo in this area, complementing the self-assessment carried out, a number of key metrics relating to the current distribution by sex within the organisation were compiled.



Statistical data for Sonaecom SGPS, S.A. in the Portuguese employment context, based on information collected as at 30 June 2026, are as follows:

	Women	Men	Total
STRATEGIC-TACTICAL LEVEL	35.3% (2025 34.4%)	64.7% (2025 65.6%)	12.0% (2025 10.6%)
OPERATIONAL LEVEL	57.4% (2025 57.6%)	42.6% (2025 42.4%)	88.0% (2025 89.4%)
TOTAL	54.8% (2025 55.1%)	45.2% (2025 44.9%)	

	Women	Men	Total
PERMANENT EMPLOYEES	55.0% (2025 54.5%)	45.0% (2025 45.5%)	98.2% (2025 95.7%)
INTERNSHIPS AND FIXED-TERM CONTRACTS	40.0% (2025 69.2%)	60.0% (2025 30.8%)	1.8% (2025 4.3%)
TOTAL	54.8% (2025 55.1%)	45.2% (2025 44.9%)	

Analysing the current context of the Sonaecom Group, we find that, at the strategic level, most roles are held by men (64.7%), with women under-represented. At the operational level, most roles are held by women (57.4%).

With regard to employment status, women represent a higher percentage (55.0%) of Sonaecom's total permanent workforce than men (45.0%), in line with the total population.

Overall, there was a slight decrease in the percentage of women during the last year, from 55.1% in 2025 to 54.8% in 2026.

The following table presents the distribution by sex and age group:

	Women	Men	Total
UP TO 25	85.7% (2025 81.8%)	14.3% (2025 18.2%)	2.5% (2025 3.7%)
26-35	59.7% (2025 59.0%)	40.3% (2025 41.0%)	21.9% (2025 25.9%)
36-55	53.3% (2025 52.4%)	46.7% (2025 47.6%)	58.3% (2025 56.5%)
+55	49.0% (2025 52.4%)	51.0% (2025 47.6%)	17.3% (2025 14.0%)
TOTAL	54.8% (2025 55.1%)	45.2% (2025 44.9%)	



It should, however, be noted that the companies within Sonaecom operate in two very distinct areas. One is a highly technical area linked to science, technology, engineering and mathematics, where the number of female graduates is typically lower than the number of male graduates. The other is Media, where there is generally a greater balance between female and male graduates.

It is also important to note that Media and Journalism careers do not distinguish between strategic and operational levels, with all employees classified at the operational level. Consequently, the greater balance between women and men in this area is not directly reflected at the strategic-tactical level.

Plan for Equality – “From Diagnosis to Implementation”

The diagnosis and self-assessment made it possible to define the Company’s current position objectively and to identify and establish a multi-level intervention plan focused on people management policies, the leaders responsible for implementing them, and the monitoring of their implementation, thereby promoting good practices in gender equality.

In this context, the Company sets out below the measures already implemented, which nevertheless require continuous monitoring and appropriate updating whenever necessary:

LEVEL	MEASURES	IMPLEMENTATION STATUS	RESPONSIBLE TEAM(S)	TEAM(S) INVOLVED	INDICATORS
COMPANY STRATEGY, MISSION AND VALUES	Consult employees at different organisational levels to assess perceptions of different dimensions of gender equality in the organisation, particularly the balance between professional, family and personal life and parental protection.	Implemented	Sonaecom Human Resources	Human Resources of subsidiaries	Evidence from internal reports analysing the feedback collected
	Make the Gender Equality Plan available in a prominent internal location.	Implemented	Sonaecom Human Resources	Human Resources of subsidiaries	Evidence of the Plan’s publication
	Broaden the range of partnerships and commitments with external entities relating to the promotion of equality between women and men, as referred to in the self-assessment section.	Implemented	Sonaecom Human Resources	Human Resources of subsidiaries	Evidence of the partnerships and commitments established
	Create the strategic KPI ‘Women in Leadership’, based on increasing the representation of women in leadership roles, and monitor its evolution.	Implemented	Sonae HRAG	Sonaecom Human Resources and Human Resources of subsidiaries	<i>Biannual dashboard monitoring the indicator’s evolution</i>
EQUAL ACCESS TO EMPLOYMENT	Ensure that human resources recruitment and selection criteria and procedures observe the principle of equality and non-discrimination based on sex and are prepared objectively and transparently.	Implemented	Human Resources of subsidiaries	Sonaecom Human Resources	Evidence from periodic analyses of recruitment processes, based on sampling.
	Explicitly address the principles of equal opportunities by gender in relevant employer branding initiatives. Continuously promote diversity in attracting and retaining talent.	Implemented	Human Resources of subsidiaries	Sonaecom Human Resources	Evidence of employer branding initiatives carried out
INITIAL AND CONTINUOUS TRAINING	Include specific gender equality modules in the annual training plan and incorporate this concern into the development of general and specific training. Ensure that employees’ personal and family lives are respected when scheduling training.	Implemented	Sonaecom Human Resources	Human Resources of subsidiaries	Evidence of the training content made available. Since 2022, 27 employees (12 women and 15 men) have participated in Unconscious Bias training.

LEVEL	MEASURES	IMPLEMENTATION STATUS	RESPONSIBLE TEAM(S)	TEAM(S) INVOLVED	INDICATORS
PARENTAL PROTECTION	Award gift cards in certain Group companies to women and men who become parents, thereby strengthening the benefits package provided as part of parental support.	Implemented	Sonaecom Human Resources	Human Resources of subsidiaries	Evidence of the benefits provided. Since 2023, 5 gift cards have been awarded (3 to women and 2 to men).
	Provide all employees with training on performance evaluation, with particular emphasis on non-discrimination, and make information on the implemented model available.	Implemented	Human Resources of subsidiaries	Sonaecom Human Resources	Evidence of the training content made available.
EQUAL WORKING CONDITIONS	Promote equality between women and men in career progression and professional development, ensuring that their skills are recognised equally in promotion and career progression processes and encouraging succession plans that include a diverse pipeline of potential candidates.	Implemented	Sonaecom Human Resources	Human Resources of subsidiaries and management teams	Evidence from reports analysing the recognition of skills by gender during salary review, promotion and talent pipeline processes.
	Promote gender representation in leadership positions, in line with existing commitments, and participation in knowledge-sharing and networking groups that provide different genders with equal visibility and access to senior management.	Implemented	Sonaecom Human Resources	Human Resources of subsidiaries and management teams	Evidence from reports analysing the recognition of skills by gender during salary review, promotion and talent pipeline processes.
	Monitor the market competitiveness of remuneration practices and periodically analyse pay balance between women and men who perform similar roles, seeking corrective solutions where appropriate.	Implemented	Sonaecom Human Resources	Human Resources of subsidiaries	Evidence from reports analysing the recognition of skills by gender during the salary review process.
BALANCE BETWEEN PROFESSIONAL, FAMILY AND PERSONAL LIFE	Strengthen the adoption of flexi-work practices by creating conditions for remote work, flexible schedules and new forms of work organisation.	Implemented	Human Resources of subsidiaries	Management and IT teams	Evidence of the practices adopted and the related communications
	Promote remote work on a partial basis, enabling employees to manage and balance their family life more effectively.	Implemented	Human Resources of subsidiaries	Management and IT teams	Evidence of the practices adopted and the related communications



In addition to the measures already implemented, the following measures are considered priorities for implementation:

LEVEL	MEASURES	OBJECTIVES	IMPLEMENTATION STATUS	RESPONSIBLE TEAM(S)	TEAM(S) INVOLVED	INDICATORS	TARGET	BUDGET
COMPANY STRATEGY, MISSION AND VALUES	Define and monitor measurable strategic objectives to promote equality between women and men. Continue the work and monitoring of the breakdown of all data by sex in all Company management tools, including assessments and reports.	Ensure the implementation of the updated Equality Plan and its monitoring, follow-up and sustainability.	Ongoing	Sonaecom Human Resources	Human Resources of subsidiaries	Evidence of the activities carried out.	Internal procedure created and implemented.	Internal costs relating to human resources allocated to the project.
	Develop and implement awareness-raising initiatives that prepare leaders to manage team diversity and gender equality under the 'Sonae All In for Gender Equality' programme launched at Sonae Group level.	Prepare leaders to manage team diversity and gender equality.	Under implementation	Sonae HRAG and Sonaecom Human Resources	Human Resources of subsidiaries and management teams	Events held with internal and/or external contributors.	Participation of all leaders in awareness-raising initiatives.	No costs expected.
	Create mentoring, counselling and coaching initiatives that contribute to developing new skills and, consequently, lead to more balanced participation by women and men in leadership roles under the 'Sonae All In for Gender Equality' programme launched at Sonae Group level.	Ensure more balanced participation by women and men in leadership roles.	Under implementation	Sonae HRAG and Sonaecom Human Resources	Human Resources of subsidiaries	Evidence of mentoring circles for discussion, capability building and guidance.	Participation of all leaders in the initiatives developed.	No costs expected in the short term.
INITIAL AND CONTINUOUS TRAINING	Include unconscious bias training in training programmes.	Mitigate the risk of unconscious bias in recruitment and people management processes.	Ongoing	Sonae and Sonaecom Human Resources	Human Resources of subsidiaries	Evidence from training records.	Training made available to all employees.	Training costs to be determined on a case-by-case basis.
PARENTAL PROTECTION	Ensure that employees who have been absent for extended periods due to parental leave have a facilitated reintegration process through mentoring, training or any other initiative considered necessary.	Encourage employees to take parental leave.	Under implementation	Sonaecom Human Resources	Human Resources of subsidiaries	Evidence of activities carried out to facilitate reintegration.	All employees returning to work after an absence benefit from support.	Costs relating to the initiatives developed to be determined on a

LEVEL	MEASURES	OBJECTIVES	IMPLEMENTATION STATUS	RESPONSIBLE TEAM(S)	TEAM(S) INVOLVED	INDICATORS	TARGET	BUDGET
								case-by-case basis.
BALANCE BETWEEN PROFESSIONAL, FAMILY AND PERSONAL LIFE	Strengthen the adoption of flexible working practices by creating conditions that facilitate access to additional holiday days, mobility of the work location and periods of unpaid leave.	Encourage employees to use flexible working measures that promote a balance between their professional, personal and family lives.	Under implementation	Human Resources of subsidiaries	Human Resources of subsidiaries	Evidence of the practices adopted and the related communications	Measures made available to all employees.	Costs relating to the initiatives developed to be determined on a case-by-case basis.

The plan is monitored regularly to track its implementation, the effectiveness of the actions and the achievement of its objectives. For this purpose, the existing working group, composed of members of the Human Resources and Legal departments and reporting to the Board of Directors, will continue to play an active role in promoting, raising awareness of and monitoring improvement actions.

In addition, initiatives developed at Sonae Group level are discussed and their impact is followed up and monitored by the Sonae Group Human Resources Advisory Group (“HRAG”), in which Sonaecom is also represented.

In conclusion, Sonaecom, in line with its work to date, will continue to seek a more active role in gender equality, recognising the importance of the topic and acting as a catalyst capable of positively influencing the different stakeholders with whom it interacts, thereby driving systemic change in the current gender equality paradigm.