



## **Gender Equality Plan**

**2024**



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## **1. Introduction**

On 1 August 2017, under Law No 62/2017, the obligation was approved in all listed entities of a plan for equal treatment and opportunities between men and women, with the aim of eliminating discrimination and facilitating the reconciliation of personal, family and professional life, as well as the adoption of a balanced representation regime between women and men in the administrative and supervision of these entities.

Following the mentioned diploma, this Law also determined for listed companies the representation quotas of both sexes of 20%, from the first elective general meeting to take place after 1 January 2018, and 33%, from the first elective general meeting to take place after January 2020, for all directors (executives and non-executives).

After 1 January 2020, the most recent Elective General Assembly of PHAROL, SGPS S.A. was held on April 30, 2021. At that General Meeting, a Board of Directors was elected composed of 50% of female members and 50% of the male gender. In May 2023, one of the female members resigned from her position, reduced this percentage to 40% and 60%, respectively. Also in the composition of its Fiscal Council the company complies with the quotas legally required.

In compliance with Article 7 of Law No. 62/2017 and Article 3 of Normative Order No. 18/2019 of 21 June, which refers to the obligation to draw up annual plans for equality, PHAROL, SGPS S.A., despite being a listed company characterized by some specificities described below, drafted its 2023 plan to disclose its current position, policies and practices regarding the subject of Gender Equality.

## **2. Who We Are**

PHAROL, SGPS S.A., a holding company, is a listed company, issuer of securities admitted to trading on the regulated market of Euronext Lisbon.



PHAROL, SGPS S.A., besides including as a reference value regarding its strategy the permanent internal diagnosis as to the promotion of equality at work, has also assumed a special attention to economic, environmental and social sustainability. Bearing this context in mind at all times, the company defends and has taken particular care with all the mechanisms relating to equal opportunities between men and women, the equity of remuneration for identical functions, alignment between the personal and professional objectives of employees.

Strategy and commitment have been keywords that, regardless of the reduction of the company's size, have always been based on its attitude, implementing procedures that allow avoiding, identifying and resolving situations that compromise, in the context of promoting gender equality, Human Rights and Work, as well as the protection of the family.

As already mentioned above, the Company has undergone a profound change in its shareholder structure and its holdings since 2015, being the holder of 0.18% of the share capital of the Brazilian company Oi with effect as of 30<sup>th</sup> June, 2022.

Due to the significant changes that have occurred, a new reality in the corporate context and the specificity of the issues it has been facing so far, the Society has equipped itself with an extremely simplified structure with a very small staff –six employees in total – with specific skills to act and pursue present and future challenges.

### **3. Vision, Mission and Values**

As a listed company with a high number of shareholders, PHAROL, SGPS S.A., has guaranteed a permanent practice of good governance rules, and several internal diplomas are in force, of which we highlight the Code of Ethics and Conduct, which has incorporated the specificity on the subject of non-discrimination and sustainability, or the Regulations that regulate the activity of the Board of Directors, of the Fiscal Council and also of the Chief Executive Officer, matters

always disclosed on the Company's website.

PHAROL, SGPS S.A. fully complies with the provisions of the current legislation governing the " balanced representation regime between women and men in the administrative and supervisory bodies of public sector enterprise entities and listed companies", as well as the principle set out in 1.2.A of the Corporate Governance Code regarding "Diversity in the composition and functioning of the bodies of society". The tables below are a good demonstration of the Company's commitment to promoting equality between women and men.

In fact, the Company's orientation on the path to equality and plurality is to accept the recommendations of diversity in the administrative and supervisory bodies of PHAROL, SGPS S.A. and which is already formally substantiated by statutory and regulatory means.

In addition, PHAROL, SGPS S.A., has a mechanism called *Whistleblowing* published on its website referring to the following framework:

*"The Company monitors the activities carried out by its employees and other stakeholders with regard to compliance with the applicable legislation and regulations and its adopted policies and procedures.*

*Any information that may comply with a suspicion or confirmation of an irregular practice by an employee or any other interested party shall be participated here.*

*The Company guarantees the confidentiality of the information and the author of the same".*

Thus, PHAROL, SGPS S.A., adopts and consequently implements, a diversity policy with a view to promoting an adequate plurality of gender and age, as well as complementary academic and professional capacities and experience within its administrative and supervisory bodies.

In this context, the concerns and principles underlying this diversity policy have

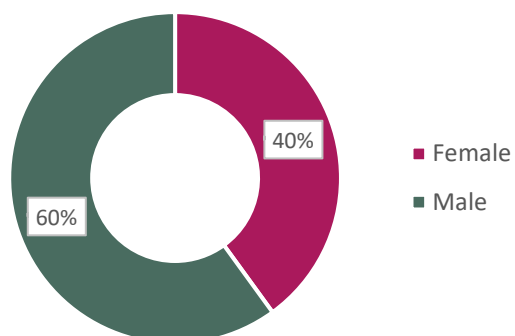
been present in the successive elections of the Company's administrative and supervisory bodies, including in the Board of Directors, and also in the Supervisory Board, persons of various ages, genders, qualifications and experience, with the purpose of promoting a greater balance, diversity and performance within these bodies.

PHAROL, SGPS S.A., maintains with all its employees a public commitment to gender diversity, based on mutual respect and equal opportunities, with strict criteria of meritocracy, transparency, accountability, individual and team recognition and equal treatment, with a constant concern for the protection of the family and parenthood.

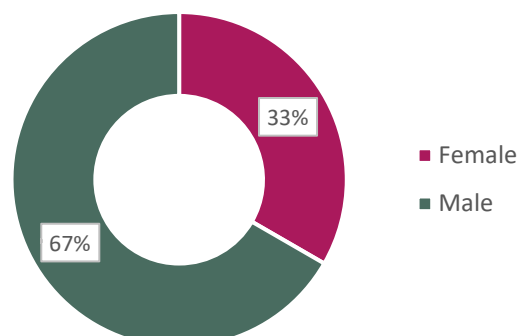
The practice of PHAROL, SGPS S.A. is to promote social dialogue with clarity and accessibility of all employees, fostering conciliation between their family life and personal and professional development and ensuring respect for the dignity of all. Guided by the example of its leaders, PHAROL, SGPS S.A. frames and guarantees to all its employees an open and transparent culture, where there is no inequality in terms of gender, nationality, ethnicity, origin, social position or age.

### Governing Bodies

Board Members

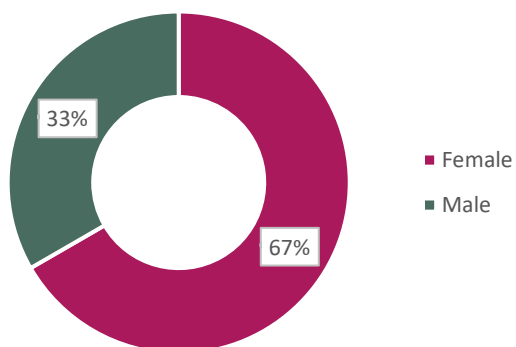


Fiscal Council



## Other Collaborators

### Workers



## 4. Monitoring and Evaluation of the Plan

As mentioned above, PHAROL, SGPS S.A., due to the small number of employees, has a very simplified organic structure so that the monitoring of this Plan, its monitoring and evaluation is under the responsibility of the Managing Director. The conclusions of the monitoring and evaluation are presented annually to the Board of Directors in order to enable the adoption of any adjustments or the implementation of new measures that are necessary and in order to promote and leverage the development of policies and practices in the field of gender equality, always taking into account, among other actions, the promotion of the debate of trends and practices in the field of diversity, the guarantee of the articulation of the Plan with the Code of Ethics and Conduct of the society and the identification of potential improvements of new measures to be implemented.

MEASUREMENT

**DIMENSION:** Strategy, mission and company values

OBJECTIVE	MEASURE	DEPARTMENTS/ RESPONSIBLE UNITS/ FOCAL POINT	DEPARTMENTS/ UNITS INVOLVED/ FOCAL POINT	BUDGET	INDICATOR	META
Publicly (internally and externally) the commitment to promoting equality between women and men	Inclusion of the commitment to the promotion of equality between women and men in the mission and values of the company	General Secretary	General Secretary	Does not involve specific costs	Documentary Evidence	2024