

The image features a vertical green bar on the left side. Overlaid on this bar and extending into the white background are several sets of concentric, semi-circular arcs. These arcs are colored in white, yellow, orange, red, teal, and blue. The title text is positioned on the right side of the image.

PLAN FOR GENDER EQUALITY 2022

SONAE

“THE CONCEPT OF GENDER
EQUALITY TRANSLATES
AS AN EQUALITY OF RIGHTS,
LIBERTIES AND OPPORTUNITIES
BETWEEN GENDERS, WITH THE
GOAL OF PROVIDING EQUAL
VALORISATION, RECOGNITION
AND PARTICIPATION
IN ALL SPHERES OF PUBLIC
AND PRIVATE LIFE.”



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1. Context

Gender equality is an established right, regarded as an essential human right for the development of society and for the full participation of all people, regardless of their gender.

The concept of gender equality translates into equality of rights, freedom and opportunities among genders, with the goal of promoting equal value, recognition and participation in all spheres of public and private life.

This concept has been receiving special attention and relevance from key international bodies over the last few years, and Portugal has been no different.

The resolution approved in the Council of Ministers no. 19/2012, on March 8th, 2021, determined that all organisations in the Government's business sector were required to adopt an equality plan, designed to achieve equal treatment and opportunities for all genders, eliminate discrimination and facilitate the balance between professional, family and personal life.

This legal requirement was later extended to companies listed on the stock market, through Law no. 62/2017 of the 1st of August 2017, which approves the regime of balanced representation between genders for the boards of directors and supervisory boards in public and listed companies, stipulating in Article 7 the requirement to draft and communicate annual gender equality plans.

This law also came to establish that the proportion of men and women shall be 20%, as of the first elective general assembly after 1 January 2018, and 33.3% as of the first elective general assembly after 1 January 2020, with regards to the board of directors and supervisory boards.

Considering the pivotal contribution of business organisations to a fully democratic and inclusive society, as well as the relevance of diversity, particularly gender, for the balance and development of its businesses, Sonae SGPS, S.A. (hereafter "Sonae" or "Group") has been dedicating special attention to this topic, seeking to balance the representation of men and women throughout the organisation, with a special focus on leadership positions.

Thus, in accordance with Article 7 of Law no.62/2017, of the 1st of August 2017, Sonae has developed a plan which aims to promote good practices within the scope of gender equality, applicable to both its employees and the members of its governing bodies, and remains committed to its continuous implementation, monitoring and improvement.

This plan covers all companies fully owned, directly or indirectly, by Sonae SGPS, S.A. Each sub-holding is responsible for developing a gender equality plan adapted to its reality, however, general alignment with this document must be ensured. If any aspects are not covered in the sub-holding's equality plans, this plan will be applied. Regarding companies controlled and co-controlled, Sonae, SGPS, S.A., as a direct or indirect shareholder, will ensure its best efforts are made to implement the plan.

This document presents a comprehensive diagnosis of gender equality at Sonae, a retrospective of the measures implemented so far and in progress, as well as the plan for 2022.



2. Diagnosis

Aiming to carry out a comprehensive diagnosis of Sonae's current situation in terms of gender equality, contributions from various sources were considered, namely:

- Guidelines for the preparation of equality plans, published by the Commission for Equality in Labour and Employment (CITE), the Portuguese national body for gender equality;
- Diagnosis support matrix;
- Detailed analysis of the strategic human resources management cycle, which follows the different stages of the employee's lifecycle;
- Recommendations, arising from CITE's technical analysis, to the plan published by Sonae in September 2020;
- Monitoring the evolution of indicators, targets and commitments subscribed.

The combination of these contributions made it possible to incorporate the internal assessment of Sonae's current situation into this plan, as well as the external perspective of CITE, and factual data that helps to objectively assess the company's position in terms of gender equality, identifying strengths and improvement opportunities to be developed. The data reported in this diagnosis refer to December 31, 2020.

Next, and with the aim of supporting the gender equality plan presented ahead, we highlight the most relevant elements of this diagnosis.

2.1. Strategy, Mission and Values

The values of inclusion and diversity are part of Sonae's matrix since its genesis, being intrinsically related to the development, growth and diversification of its businesses and integrating a prominent place on the agendas of our top management. Over the course of time, these same values have been actively fostered across the entire organisation, through the promotion of equal opportunities for all, regardless of their role and position within the organisation, as well as their gender, ethnicity, age, religion or sexual orientation.

Under the motto "to be a long living company", it has been fundamental for Sonae to develop and implement a corporate strategy that focuses on and invests in the merit-based development of its people, adopting an approach that aims to ensure sustainability in people management, namely concerning to equal opportunities, regardless of gender.

Specifically, and publicly, Sonae's commitment to the issue of gender equality is present in its Code of Ethics and Conduct and in the Values and Principles that guide its way of being in life and in business, known as "our way", in which stand out:



"(...) we establish these relationships according to principles of honesty, integrity and transparency."



"(...) we incessantly promote meritocracy and we welcome diversity at all levels within the organisation."



"(...) with merit. We assume merit as maximum criteria for assessment and progression, because only that way can we grow personally and professionally."



"(...) we are aware of the richness that exists in the heterogeneity of paths and profiles of our people, as well as the plurality of businesses and geographies where we are present. We wish to continue fostering diversity because it is the combination of differences that generates dynamism."

In line with the corporate strategy and values presented above, Sonae's human resources strategy also strives to promote a diverse and inclusive organisation as one of its essential vectors, taking into account for the purpose the different phases in the life cycle of employees.

2.2. Equal access to employment

Sonae seeks to promote equal opportunities, regardless of gender, throughout the employees' lifecycle.

With regard to the selection and recruitment of human resources, Sonae is committed to the principle of equality and non-discrimination based on gender, and has defined objective and transparent criteria and procedures. Sonae invests in identifying and capturing talent with diverse academic, professional and personal backgrounds. In the recruitment processes, it is recommended that whenever recruiters present a shortlist to the business, it is balanced in terms of representation between men and women.

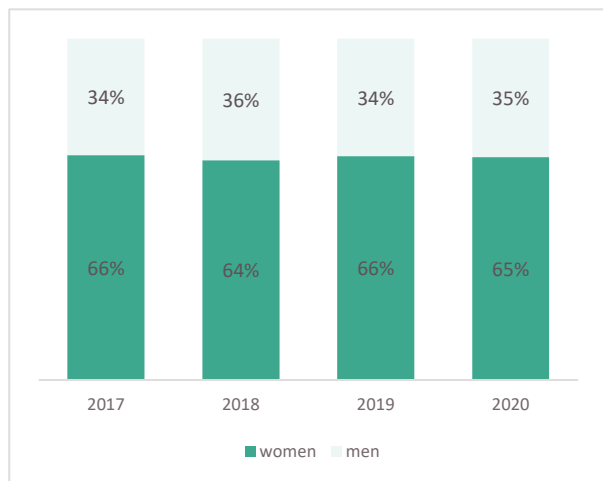
In parallel, throughout the professional career, it is also sought that this diversity of profiles and characteristics is enhanced and reinforced, in order to ensure a better preparation of employees to face the multiple challenges that the businesses impose. Additionally, it is also proposed that, at the all levels of the company, there is balanced gender representation in the teams.

Over the past year, Sonae has developed a training plan on Unconscious Bias for selection and recruitment teams.

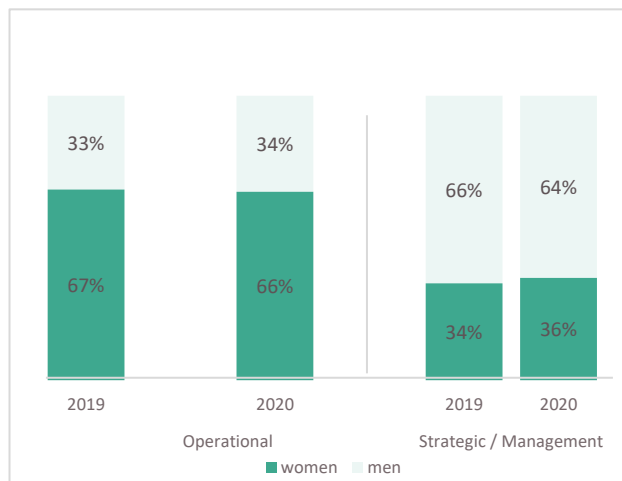
In 2020, of the total number of new comers at Sonae, 55.1% were women, compared with 50.6% in 2019. In terms of leadership roles, the percentage of women hired was 40.6 % (an increase of 14p.p. compared to 2019).



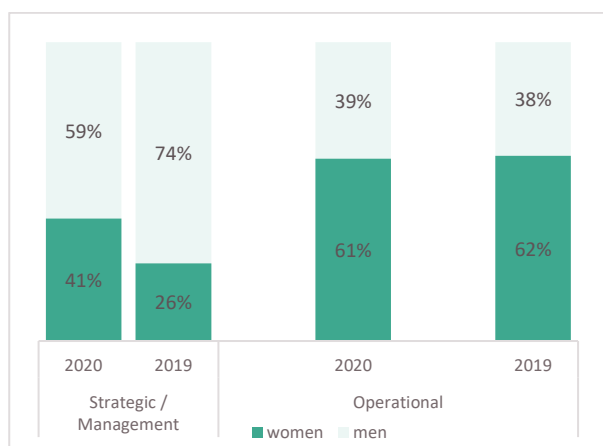
Evolution of distribution between men and women (2017-2020)



Distribution of men and women by organisational levels (2019-20)



Distribution of admissions between men and women (2019-2020)



2.3. Initial and Continuous training

Sonae's primary goal is to acknowledge its employees, and we strongly invest in their training and other initiatives that contribute to their personal and professional development. We ensure that learning opportunities are transversal and equitable throughout the organisation, covering all businesses, functions, generations and geographies where the Group is present.

As such, every year, training plans are developed bearing in mind the principle of equality and non-discrimination between men and women, also ensuring a balanced representation in all training initiatives developed.

Aware of the influence that unconscious bias has in decision-making processes, Sonae is developing a transversal training Programme dedicated to the topic, aiming to provide employees with knowledge, tools and strategies that allow them to recognise the importance of diversity and inclusion and the benefits of such practices for the organisation. This plan



includes the identification of potential situations of unconscious bias and/or inappropriate behaviour, allowing the assessment of their impact on the performance of teams and businesses and on the relationship with different stakeholders.

2.4. Equality in working conditions

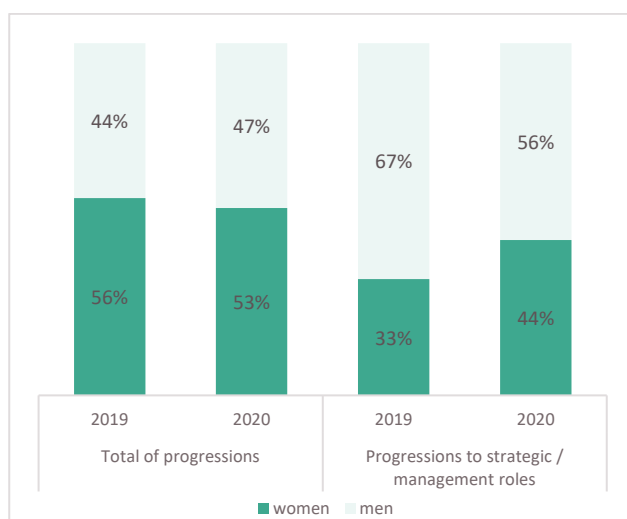
The development of our people is one of the pillars of our strategic human resources management model; it is a field of constant investment, one that is absolutely essential for the fulfilment of Sonae's ambition for growth and diversification.

The Group actively promotes a culture of meritocracy, where the differentiation of performance and the contribution of people and teams is supported by processes and tools for assessment and recognition.

Performance appraisals, promotions, salary reviews and exits are monitored, by gender, to ensure proper management across all teams.

In 2020, Sonae showed significant improvements in the proportion of women promoted to leadership roles. Of the total number of employees promoted to strategic/management roles, 44% were women, compared with 33% in 2019.

Distribution of progressions between men and women (2019-2020)



With regard to equal pay, Sonae regularly assesses and monitors studies on pay conditions to guarantee mechanisms for controlling gender parity in this matter. Likewise, in terms of salary evolution, Sonae acts proactively to make sure that when women reach a promotion, they're in an equality scenario.

In parallel, considering the engagement and retention of the talent needed to ensure a response for current and also medium/long-term challenges, Sonae has been investing in the development of initiatives that promote alignment between employees' personal and professional expectations and businesses' strategic objectives. This pillar is also linked to the initiatives described below, namely in the context of balancing professional, family and personal life, social climate and communication.



2.5. Parenting protection

Sonae guarantees the right to parental leave for all employees. In recent years, we have seen an increase in the demand for extended parental leave, with more and more employees (men) enjoying this right. It is Sonae's commitment to ensure that all employee rights are safeguarded, implying the temporary replacement of the employee on parental leave, through contractual procedures that ensure such replacement.

Likewise, it is also ensured the granting to employees of periods of layoff and absences to care for children, as previewed in the applicable legislation.

Parental Leaves (2020)

	Men	Women	Total
Number of employees entitled to parental leave	15.491	29.834	45.325
Number of employees who took parental leave (no.)	656	1.628	2.284
Number of employees who returned to work after completion of parental leave	644	1.581	2.225
Number of employees who returned to work after completion of parental leave and remained at the company after 12 months	492	1.160	1.652
TAKE UP RATE (%)	4%	5%	5%
RETURN RATE (%)	98%	97%	97%
RETENTION RATE (%)	75%	71%	72%

2.6. Balance between professional, family and personal life

The issue of gender equality must be understood in a broader perspective, encompassing equal opportunities for all genders, in different contexts – professional, family and personal. In this sense, Sonae has been developing transversal programmes that aim to fulfil this ambition.

From the outset, it is important to highlight the flexible work programme, which has set out to actively contribute to integrating the personal and professional lives of employees and, consequently, for their well-being and professional fulfillment. With different formats, adjusted to the needs and reality of each employee, this programme is designed to share and encourage the adoption of flexible work models, allowing employees to work remotely, to choose when their work day begins and ends, to reduce their weekly workload, to request for unpaid leave and to have up to 5 extra unpaid days for personal purposes.

Thus, the possibility of working remotely was already implemented at Sonae and at some of its subsidiaries even before the pandemic. The policies in place ensured a quick and safe response, aiming to protect the health and well-being of our employees. All those who had roles that could be played remotely and already had the necessary technological equipment immediately went home. This helped to minimise any risks and ensured business continuity. In a short period of time, more than 6,000 employees from the central structures were placed in remote work.

It is important, however, to point out that most of the activities carried out at Sonae and its subsidiaries are considered by the Government as essential for society, and therefore they needed to be ensured even in a pandemic.



Sonae is studying different scenarios and possibilities for a “new normal”, post-Covid, and the result is likely to be the adoption of multiple solutions given the diversity of the Group's businesses and functions and the need to ensure their specificities. We have different realities and needs, which is why each business is organizing itself and defining the model that better applies to its reality, safeguarding the interests of everyone involved. Among the scenarios under analysis is the return to a 100% face-to-face format, for those who want it or for jobs that cannot be performed remotely, going through hybrid models, or even fully remote models. Above all, the concern is to create strategies that ensure that Sonae employees have solutions that allow them to better balance their professional life with their family and personal life.

Under the scope of its corporate responsibility policy, Sonae has the ‘Somos Sonae’ programme, developed in partnership with the Portuguese Red Cross, through which assistance is provided to employees and their families, who are in particularly vulnerable socioeconomic circumstances.

Still in terms of family support, Sonae develops, in partnership with the Belmiro de Azevedo Foundation, a programme that awards school prizes and scholarships, and aims to recognise merit and encourage good school performance from employees’ children.

Also, within this context, Sonae provides its employees with a comprehensive benefits and advantages system – ‘Mais Sonae’ -, through an extensive network of partners in various spheres of activity, from health and well-being, sports, communications, training and education, retail, tourism, culture and leisure, among many others. ‘Mais Sonae’ has been increasingly investing in diversity, in geographic reach, and in the importance of Sonae partnerships, always considering the needs and preferences of Sonae’s employees.

2.7. Preventing harassment in the workplace

Sonae does not condone any form of harassment or any other behaviour that jeopardises the dignity of employees, and has developed a document for the purpose – the Code of Good Conduct for Preventing and Combating Harassment in the Workplace – which systematises a set of principles and behaviours to prevent and combat any harassment in the work context.

Any employee who might be harassed at work, as well as an employee who witnesses this kind of behaviour, must report it within the shortest possible time. This must be addressed to the HR Business Partner, who will endeavour to quickly and efficiently investigate the facts reported, in strict compliance with the applicable law.

The investigation procedure will be conducted ensuring that the privacy, confidentiality and dignity of the affected persons are protected at all times, without prejudice to the relevance that the complaint and its elements may have in order to guide disciplinary procedures.

If the practice of harassment is proven, the harasser will be disciplined, without prejudice to any civil and/or criminal liability provided for by law.

Sonae guarantees that the whistle-blower and the witnesses indicated by him/her cannot be disciplined for statements made or facts established in a judicial or administrative proceeding triggered by harassment, until the final decision is made, unless the act was made with intent.



2.8. Communication and Partnerships

To consistently underline the importance of promoting gender equality in the company and in society, Sonae has invested in the development of internal and external communication initiatives, which aim to publicly express its position on this topic and raise awareness of its importance. In parallel, Sonae has been establishing national and international partnerships with recognised entities to reinforce its commitment.

In the sphere of external communication, Sonae has reinforced its presence in the media, for example through a more active participation of top management in interviews and articles on gender equality. Alongside this, digital channels (social networks, website and blog) have also been important vehicles for disseminating Sonae's position on this issue. In the internal sphere, Sonae created the All In for Gender Equality Programme, which aims to reinforce the importance of the topic among employees and make them aware of the added value of their involvement in this matter.

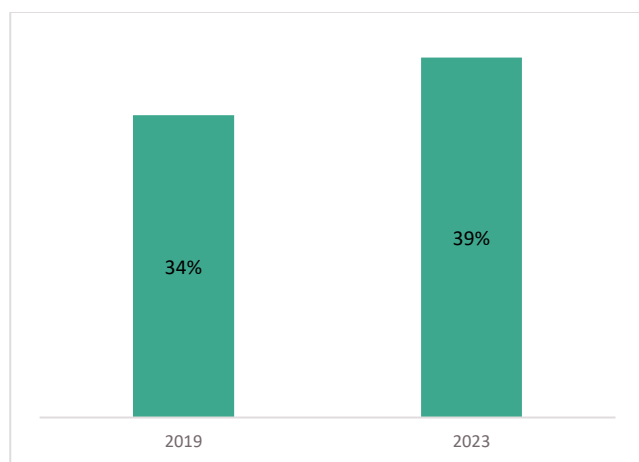
At the same time, Sonae has been strengthening its association with national / international networks, events, studies and other external initiatives that aim to promote gender equality, such as:

- Participation in the ERT (European Round Table for Industry - an organisation that brings together leaders from some of the largest European companies) 'Women Initiative', which embodies Sonae's commitment regarding gender parity with the establishment of voluntary targets that facilitate the promotion of increased diversity.
- Leadership of the ERT's 'Taskforce on Diversity and Inclusion', which aims to accelerate gender-balanced representation - namely in leadership positions -, as well as to create increased internal awareness and to empower women and teams to overcome personal and social barriers and change perception of this issue.
- Participation in the Diversity & Inclusion Initiative, promoted by the WBCSD, regarding the identification of practices and models to be designed in the future with a view to gender parity.
- Association with 'Lean In Org.', a global community dedicated to helping women achieve their ambitions, through which Sonae intends to train and empower its employees, through mentoring, advice and discussion forums on relevant issues in the field of gender equality (e.g. parenting, work-life balance, unconscious bias, etc.).
- Participation in the 'Women Matter' research, developed by McKinsey, through the contribution of information and data about Sonae.
- The partnership with the 'Programa Promova', which aims to contribute to increase the presence of women in Portuguese business and aims to develop women with leadership potential, enabling their promotion to management roles in their companies, thus contributing to the reduction of the gender equality gap. These initiatives, among other strategies and alongside the sharing of good practices, disseminate role models (internal and external) with a strong potential to change behaviour.

Conscious of the need to accelerate internal change and intervention within the scope of gender equality, Sonae defined a formal ambition for its leaders and teams. As a result of an internal discussion and approval process in management forums, Sonae's ambition was defined to evolve its representation of women in leadership roles from 34% in 2019 to 39% in 2023. Achieving this challenging goal is intrinsically dependent on an assertive plan and commitment by Sonae and its sub-holdings.



Women representation in leadership positions (2019-2023)



Retrospectively, Sonae has been celebrating a set of voluntary agreements and commitments, which aim to speed up this path towards gender equality, namely:

1. Commitment with the Portuguese Government

In October 2015, Sonae signed an agreement with the Portuguese Government committing to diligently continue developing its best efforts to maintain above 30% the level of representation of the underrepresented gender on the board of directors. This commitment stipulated the internal staff development of the underrepresented gender along the various leadership levels at Sonae, so that in the future, its shareholders can maintain the level of representation on the board of directors above 30%. The referred agreement falls under the Resolution of the Council of Ministers 11-A, of the 6th of March of 2015.

2. ERT - Women Initiative

Within the scope of the European Round Table for Industry (ERT), Sonae subscribed in 2013 to the 'Women Initiative', which embodies the organisation's concern regarding gender parity with the establishment of voluntary targets that facilitate the promotion of increased gender diversity by 2020 horizon: (i) 30% representation of the underrepresented gender for boards of directors and supervisory boards; (ii) 21% representation of the underrepresented gender in executive positions; (iii) 30% representation of the underrepresented gender in senior and middle management positions (these targets are available for consultation at <https://ert.eu/documents/voluntarytargets2020/>).

In this context, the companies supporting this initiative, aiming to go beyond the mere reporting of targets and achievement levels in the field of gender diversity, have suggested the creation of a forum, specifically dedicated to the discussion and sharing of practices implemented by member companies.

3. ERT – Pledge Embrace Difference (Diversity & Inclusion)

In November 2018, Sonae signed the first European commitment for diversity and inclusion, transversal to several industries, called the 'Embrace Difference' Pledge (Diversity & Inclusion). This commitment advocates the creation of an appropriate working environment and conditions so that all employees can reach their full potential, through: inclusive culture and leadership, definition of targets and objectives, clarification of responsibilities,

equal opportunities, and social engagement and responsibility (information available for consultation on <https://embracedifference.ert.eu/>).

The diagnosis carried out highlights how important it is for Sonae to develop a more diverse and inclusive organisation, which provides equal opportunities and freedom, regardless of gender. However, the company recognises the need to strengthen its investment to achieve this ambition.

As such, Sonae defined an action plan based on 4 fundamental pillars:

- Policies: ensure gender proofed HR policies at every stage of the employee lifecycle, from attraction and selection, to development and progression, as well as retention.
- Awareness: raise awareness on the relevance of gender diversity and equality among different stakeholders, from leaders, to employees and HR teams.
- Empowerment: provide women and teams with tools and mechanisms able to empower them in breaking down personal and perception barriers.
- Governance model: ensure acceleration and close monitorization of the defined plan and relevant metrics.

In the next chapter, more details will be presented on the measures already implemented and those that are ongoing, as well as the plan to be rolled-out in 2021, to create greater equality between men and women.

3. Plan for Gender Equality

The issue of gender equality has been publicly and notably advocated by Sonae's leadership and key decision-makers, demonstrating its indisputable relevance within the company.

Thus, this plan aims to ensure the promotion of good practices on gender equality, applicable both to Sonae's employees and members of the governing bodies. Sonae is absolutely committed to implementing the proposed initiatives, as well as to their constant monitoring and improvement. The presented diagnosis enabled Sonae to objectively define the current position of the company, enabling the identification and design of a plan compatible with its motivation in this matter.

In this context, based on the guidelines shared by CITE, Sonae selected the measures considered as a priority, given the results of the diagnosis, and defined a multilevel intervention plan, which includes measures already implemented, measures under implementation, as well as measures to be implemented in 2021.

Dimension: Strategy, Mission and Values						
Objectives	Measure	Departments responsible	Departments involved	Budget	State of Implementation	Indicators
Publicly undertake (internally and externally) the commitment to the promotion of equality between men and women	Reference to the commitment to promoting equality between women and men in the company's mission and values	Communication	Human Resources	No specific costs entailed	Implemented	Explanation of commitment to Sonae Values and Principles



	Commitment to promoting equality between women and men in strategic documents (e.g., reports, regulations, code of ethics/conduct) as a company value	Communication	Human Resources	No specific costs entailed	Implemented	Explanation of commitment to Sonae Values and Principles
Publicly undertake (internally and externally) the commitment to the promotion of equality between men and women Promote and consolidate external relations concerning the promotion of equality between men and women	Establishment of national and international strategic partnerships with stakeholders from different parts of the community	Human Resources	Public Affairs and Communication	No specific costs entailed	Implemented	Public disclosure of established partnerships , through the company's communication channels
Ensure the implementation of the plan for gender equality, its monitoring, follow-up and sustainability	Introduction of the theme of gender equality in the agendas of existing management forums, in order to ensure that leaders monitor the implementation of defined policies and are responsible and committed to the success of their execution	Board of Directors and Executive Committee	Business Management Teams	No specific costs entailed	Implemented	Internal reports shared with the management forums identified
	Definition of a strategic KPI - Women in Leadership -, based on an increase in the representation of women in leadership roles, and the monitoring of its evolution	Board of Directors and Executive Committee	Business Management Teams	No specific costs entailed	Implemented	Bi-annual dashboard to monitor the evolution of the indicator
	Monitoring and annual reporting of the indicators related to gender equality, throughout the employee lifecycle to Sonae's Executive Committee and the Board of Directors	Human Resources	Human Resources <i>Sub-holdings</i>	No specific costs entailed	Implemented	Annual report with the evolution of the main indicators



<p>Ensure the implementation of the Gender Equality Plan, its monitoring, follow-up and sustainability</p> <p>Contribute to a better balance between women and men in the company</p>	<p>Definition of a governance model for monitoring gender equality, led by Sonae's Board of Directors and the Human Resources Advisory Group</p>	<p>Board of Directors</p>	<p>Sonae's Executive Committee and Human Resources Advisory Group</p>	<p>No specific costs entailed</p>	<p>Implemented</p>	<p>Evidence of the model's approval by the Board of Directors</p>
<p>Publicly undertake (internally and externally) the commitment to promoting equality between women and men</p> <p>Engage all employees in the implementing the Plan for Equality</p>	<p>Internal and external publication of the plan for gender equality, as well as its annual monitoring, in order to underline the executive commitment to the topic</p>	<p>Human Resources</p>	<p>Communication</p>	<p>Costs related to the development of communication materials</p>	<p>Implemented</p>	<p>Availability of documents in the appropriate digital channels</p>
<p>Promote a culture of equality between men and women in the workplace, encouraging consistent management and work practices</p> <p>Promote internal desegregation and a better balance between men and women in the company</p>	<p>Development of a communication / activation strategy aiming to enhance the impact of Sonae leaders' role modeling to disseminate inclusive practices that promote gender equality</p>	<p>Human Resources and Communication</p>	<p>All Units</p>	<p>Costs related to the development and implementation of the communication campaign</p>	<p>Ongoing</p>	<p>Evidence of internal communication (events and messages) and external (news published in the media) with the participation of the Group's role models (e.g. Sonae CEO, members of Executive Teams, among others)</p>
<p>Ensuring the monitoring and adoption of best practices in the field of gender equality</p>	<p>Recurrent development of benchmark studies, to monitor the evolution of relevant metrics in the field of equality between men and women vis-à-vis national, international and sectoral peer groups</p>	<p>Human Resources</p>	<p>Human Resources</p>	<p>No specific costs entailed</p>	<p>Ongoing</p>	<p>Evidence from studies carried out</p>



Engage all employees in implementation of the plan for gender equality	Sharing with employees relevant indicators about gender equality, through channels designated for this purpose	Human Resources	Communication	No specific costs entailed	Implemented	Evidence of internal communication (messages) and external (news published in the media) disclosed
Recognise and integrate the equal visibility of men and women in all forms of language, both internally and externally Refute the perpetuation of gender stereotypes and reinforce a culture of equality between men and women	Alignment of corporate publications with the principles of gender equality, non-discrimination and non-harassment, for example: our way, code of ethics and conduct and strategic documents	Communication	Human Resources, Corporate Governance and Ethics Committee	Costs related to updating publications	Ongoing	Update publications in different channels
Promote internal desegregation and a better balance between men and women in the company	Development and implementation of communication, debate and sharing channels dedicated to gender equality in its different dimensions	Human Resources and Communication	All Units	Costs related to the development and implementation of the initiatives defined	Implemented	Evidence of the existence of channels and the holding of debate and sharing sessions
Publicly undertake (internally and externally) the commitment to promoting equality between men and women	Creation of a web page on Sonae's websites (Intranet and Internet) dedicated to the topic of Diversity and Inclusion, addressing gender equality as one of its areas of intervention	Communication	Human Resources	No specific costs entailed	Ongoing	Evidence of pages created in different channels
Ensure information to employees regarding rights and duties in the field of equality and non-discrimination	Creation of an internal procedure to ensure that the company discloses, in an appropriate and accessible site, information on the rights and duties of employees, on gender equality and non-discrimination	Human Resources	Communication	No specific costs entailed	To be implemented in 2022	Evidence of the procedure created and respective availability



Scope: Equal access to employment						
Objectives	Measure	Departments responsible	Departments involved	Budget	State of Implementation	Indicators
Contribute to a fair and objective selection and recruitment process for men and women Refute the perpetuation of gender stereotypes and reinforce a culture of equality between men and women	Encouraging the application and selection of men or women for roles / jobs where they are underrepresented	Human Resources	Recruitment teams	No specific costs entailed	Ongoing	Existence of programmes dedicated to attracting the underrepresented gender to certain functions / areas
Contribute to a fair and objective selection and recruitment process for men and women	Continuous implementation of short lists of candidates that ensure the principle of equality and non-discrimination based on gender	Human Resources	Recruitment teams	No specific costs entailed	Ongoing	Recommendation created and shared with the teams involved
	Explanation of the principles of equal opportunities by gender in internal and external recruitment processes, as well as in relevant employer branding actions	Human Resources	Recruitment teams, Communication e Employer Branding	No specific costs entailed	Ongoing	Evidence of initiatives to be carried out
	Create training programmes on selection and recruitment procedures without gender bias, for teams who conduct selection and recruitment interviews	Human Resources	Recruitment teams	No specific costs entailed	Ongoing	Training sessions held
Guarantee the principle of equality between women and men and non-discrimination in access to employment	Check all job posts and other jobs advertisements to ensure that they do not contain, directly or indirectly, any restriction, specification or preference based on gender	Human Resources	Recruitment teams	No specific costs entailed	Ongoing	Job posts and other jobs advertisements assesment



	Creation and implementation of an internal procedure to ensure that the company maintains a record of the recruitment processes carried out for five years, with due disaggregation by gender, in accordance with the elements identified in the Labour Code	Human Resources	Human Resources	No specific costs entailed	Implemented	Evidence of internal procedure created
	Creation and implementation of an internal procedure to ensure that the selection and recruitment process provides for the provision of information on the professional category and a summary description of the corresponding functions, as well as information on the value and frequency of remuneration	Human Resources	Human Resources	No specific costs entailed	Implemented	Evidence of internal procedure created
Guarantee the principle of equality between women and men and non-discrimination in access to employment Protect the safety and health of the pregnant, postpartum or breastfeeding employee	Creation of a procedure to ensure that, during the trial period, the company respects the period of effective execution of the contract in order to assess its maintenance	Human Resources	Human Resources	No specific costs entailed	Implemented	Evidence of internal procedure created
	Creation of a procedure to ensure that the company temporarily replaces a pregnant, postpartum or breastfeeding employee who is hired on a permanent term and absent from work in the enjoyment of rights related to parenting, guaranteeing their return after the enjoyment of these rights	Human Resources	Human Resources	No specific costs entailed	Implemented	Evidence of internal procedure created and implemented



Scope: Initial and continuous training						
Objectives	Measure	Departments responsible	Departments involved	Budget	State of Implementation	Indicators
Counter structural barriers to equality between men and women	Development and inclusion of modules related to the topics of equality between men and women, in the training plans (e.g. unconscious bias)	Human Resources	Training teams	No specific costs entailed	Ongoing	Evidence of training content provided on gender equality
Promote a culture of equality between men and women in the workplace, encouraging consistent management and work practices Encourage balanced participation of men and women in decision-making roles	Development and implementation of awareness initiatives, that may prepare leaders to manage team diversity and gender equality	Human Resources	Human Resources <i>Sub-holdings</i> and Training teams	Costs related to the implementation of those initiatives	Ongoing	Organisation of a series of events, promoted by internal and external influencers, to discuss issues related to gender equality and women in leadership, under the 'Sonae All In for Gender Equality' Programme
	Design and implementation of mentoring, advice and coaching initiatives, to develop new skills in leadership roles and, consequently, lead to a more balanced participation between men and women	Human Resources	Human Resources Sub-holdings and Training Teams	Costs related to the implementation of those initiatives	Ongoing	Evidence of mentoring circles for discussion, training and guidance on a diverse set of topics (e.g. parenting, work-life balance, unconscious bias, etc.) under the 'Sonae All In for Gender Equality' Programme
Counteract structural barriers to equality between men and women	Inclusion of the thematic of equality between men and women in general and technical training, whenever applicable	Human Resources	Training Teams	No specific costs entailed	To be implemented in 2022	Evidence of content on gender equality in training modules



Scope: Equal working conditions						
Objectives	Measure	Departments responsible	Departments involved	Budget	State of Implementation	Indicators
Promote equality between men and women in terms of progression, professional development and career	Creation of career management programmes for the underrepresented gender, which may provide the necessary tools for their development and enhance their progression	Human Resources	Human Resources	No specific costs entailed	Implemented	Creation of an Accelerated Development Programme for top talent women
	Encouraging the review of succession plans, ensuring that they include a pipeline that guarantees gender diversity among candidates	Board of Directors and Sonae Executive Committee	Business Management Teams and Human Resources	No specific costs entailed	Ongoing	Analysis of the succession plans developed
Encourage balanced participation of men and women in decision-making roles	Control and minimisation of the exit risk of top talent women, particularly at the strategic level	Human Resources	Human Resources Sub-holdings	No specific costs entailed	Implemented	Analysis of women top talent % and its variation
Ensure the principle of equal pay for equal work or work of equal value	Regular development of assessment studies and monitoring of wage conditions, seeking to ensure mechanisms for controlling gender parity in this matter	Human Resources	Human Resources Sub-holdings	No specific costs entailed	Implemented	Internal monitoring report on the evolution of the Group's salary conditions
Ensuring a work environment free from discrimination based on gender, parenting and/or the reconciliation of professional, family and personal life	Regular assessment of the employees' perceptions regarding gender equality in the organisation, seeking to assess existing levers and barriers	Human Resources	Human Resources Sub-holdings	Costs related to the surveys' development and analysis	Ongoing	Evidence of internal studies carried out (Social Climate) and respective conclusions
Ensure respect for the principle of equality and non-discrimination between men and women	Analysis and monitoring about public participation of people from different genders in national and international events, in order to act on any asymmetries	Communication	Human Resources	No specific costs entailed	To be implement in 2022	Definition of annual attendance strategy, ensuring gender diversity in Sonae's external representations Internal dashboard to monitor attendance



Promoting balance between women and men in the company's strategic positions	Creation and implementation of a procedure to ensure a minimum representation of each gender in the management and supervisory bodies	Shareholders' Meeting	Board Nomination Committee	No specific costs entailed	Implemented	Analysis of the representation of men and women in the management and supervisory bodies
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Scope: Protection in parenting						
Objectives	Measure	Departments responsible	Departments involved	Budget	State of Implementation	Indicators
Promote the balance between professional, family and personal life of employees	Continuous strengthening of the portfolio of benefits associated with employees, in order to provide more effective support for parenting	Human Resources	Human Resources	No specific costs entailed	Implemented	Internal digital platform of benefits and advantages, available to all employees with updating of all (new) partnerships created

Scope: Balance between professional, family and personal life						
Objectives	Measure	Departments responsible	Departments involved	Budget	State of Implementation	Indicators
Promote the balance between professional, family and personal life of employees	Providing equipment, granting financial support or signing protocols with support services for employees' children (or other dependent children)	Human Resources	Human Resources	No specific costs entailed	Implemented	Provision of information regarding the established protocols and respective conditions offered to employees
	Disclosure of existing resources in the geographical area of the company and/or the residence of employees that facilitate the balance between professional, family and personal life (e.g. nurseries/nanny service, institutions for the elderly, laundry, catering/take away, minor repairs)	Human Resources	Communication	No specific costs entailed	Implemented	Evidence of an internal platform created for the purpose and communication reinforcement mechanism used
	Providing equipment, granting financial support or signing protocols for health and/or well-being services	Human Resources	Human Resources	No specific costs entailed	Implemented	Evidence of special conditions offered to employees



	Encouraging the adoption of flexible working practices already in place, namely remote work, flexible working hours and new forms of work organisation	Human Resources	All Units	No specific costs entailed	Implemented	Progressive increase in employees' adherence to flexible work programmes
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Dimension: Prevention of harassment in the workplace						
Objectives	Measure	Departments responsible	Departments involved	Budget	State of Implementation	Indicators
Ensure the prevention and fight against harassment at work Prevent and combat the practice of other offenses to the physical or moral integrity, freedom, honour or dignity of the employee	Existence of a code of conduct to prevent and combat harassment at work	Human Resources	Corporate Governance	No specific costs entailed	Implemented	Evidence of the document made available on the Group's intranet
	Existence of an internal procedure for reporting and analyzing situations of potential harassment at work	Human Resources	Corporate Governance, Ethics Committee and Ombudsman	No specific costs entailed	Implemented	Internal reports shared with the Group's Ethics Committee
	Formalisation and wide communication of the ombudsman as a privileged channel to receive and manage suggestions and complaints from employees in the field of gender equality and harassment at work	Human Resources	Ethics Committee and Ombudsman	No specific costs entailed	To be implemented in 2021	Evidence of the communication carried out



4. Monitoring of plan execution

The execution of Sonae's Gender Equality Plan will be subject to a systematic follow-up process in order to monitor the effectiveness of its actions and the achievement of its goals, identifying potential areas of improvement or new measures to be implemented.

For this purpose, Sonae defined a governance model that ensures the acceleration and monitoring of the defined plan and the relevant metrics to be monitored, through an approach that defines common principles and synergies, but, at the same time, promotes autonomy of companies to define specific objectives and initiatives, adjusted to their reality.

This governance model is composed by:

Governing body	Main responsibilities
Board of Directors	Monitor Sonae's evolution towards gender equality. Challenge teams.
Board Nomination Committee	Monitor diversity & inclusion as a whole within the organisation. Challenge Sonae's Board of Directors and Executive Committee to create a more inclusive organisation.
Group CEOs	Sponsor the defined gender equality plan. Validate strategic decisions. Empower teams and lead by example.
Human Resources Advisory Group	Strengthen change management. Manage risks. Leverage the decision process. Ensure the implementation of the Gender Equality Plan in each business. Monitor, every six months, the evolution of indicators and propose reinforcement measures, when necessary. Take an active role in debating and sharing trends and good practices in the field of gender equality.

In conclusion, it is important to note that Sonae, as an agent with an active and intervening role in society, believes that the ambition expressed in this document should go beyond organisational boundaries, seeking to positively influence the different players with which it interacts, so as to drive a sustained shift in the current paradigm.