

Equality plan 2024

MCretail SGPS, S.A.

Considering the following international commitments assumed by Portugal, which are welcome by MCretail SGPS, S.A., namely:

- *The commitments arising from the Fourth World Conference on Women, held in Beijing in September 1995, the Declaration and Platform for Action adopted in Beijing and the subsequent outcome documents adopted at the United Nations special sessions;*
- *The 1979 UN Convention on the Elimination of All Forms of Discrimination against Women (CEDAW);*
- *The Universal Declaration of Human Rights of 1948;*
- *The EU Charter of Fundamental Rights;*
- *The Treaty on European Union, which emphasises the values common to the Member States, such as pluralism, non-discrimination, tolerance, justice, solidarity and equality between men and women;*
- *The Treaty on the Functioning of the European Union, whose Article 19 refers to combatting discrimination based on sex;*
- *The Women's Charter, adopted on 5 March 2010;*
- *The European Union Strategy for Growth and Employment - Europe 2020, adopted on 17 June 2010;*
- *The European Pact for Gender Equality (2011-2020), adopted on 7 March 2011;*
- *The European Gender Equality Strategy 2020-2025; and*
- *The Sustainable Development Goals, namely 1, 5 and 10.*

Considering the Fundamental Rights and Duties enshrined in the Constitution of the Portuguese Republic, namely article 13;

Considering the Labour Legislation in force, namely the articles included in Subsection III of the Labour Code - Equality and Non-Discrimination and Subsection IV - Parenthood;

Considering Law no. 60/2018, of 21 August – , approving measures to promote equal pay for women and men for equal work or work of equal value;

Considering Law no. 62/2017, of 1 August, approving the system of balanced representation between women and men in the management and supervisory bodies of entities in the public business sector and listed companies, determining in its article 7 the obligation to draw up annual equality plans 'aimed at achieving effective equality of treatment and opportunities between women and men, promoting the elimination of discrimination on the basis of sex and fostering conciliation between personal, family and professional life';

Considering Ordinance no. 84/2015, of 20 March, – creating and regulating the measure for the Promotion of Gender Equality in the Labour Market;

Considering Council of Ministers Resolution no. 11-A/2015, of 6 March - mandating the Secretary of State for Parliamentary Affairs and Equality, the Secretary of State for Regional Development, the Assistant Secretary of State and of Economic Affairs and the Secretary of State for Employment to, (i) within 90 days from the date of publication, develop diligences with a view to concluding, with the companies listed on the Stock Exchange, a commitment that promotes a greater balance in the representation of women and men in the respective boards of directors, implying, on the part of the companies, the commitment to a representation target of 30% of the under-represented gender, by the end of 2018, as well as (ii) promote the creation and provision, without costs for the companies, of a support mechanism for the identification and analysis of wage gaps between men and women;

Considering Council of Ministers Resolution no. 18/2014, of 5 March 2014 - establishing a set of measures to be adopted to counter the historical trend of unequal pay that penalises women, with a view to achieving effective Gender Equality;

Considering the V National Plan for Equality (Council of Ministers Resolution no. 103/2013), of 31 December, , namely seeking: to reinforce with private sector companies the implementation of equality plans (41st); to monitor the application of the legal scheme of the State business sector, regarding the

implementation of equality plans and the representation of women on boards of directors (42nd); and to consider as a tie-breaker criterion, in the selection of projects from companies competing for cohesion policy funds, the representation of women on those companies' boards of directors (43rd);

Considering Decree-Law no. 133/2013, , of 3 October, approving the new legal scheme for the public business sector;

Considering Council of Ministers Resolution no. 13/2013, of 8 March, approving a set of measures aimed at guaranteeing and promoting equal opportunities and results between women and men in the labour market;

Considering Assembly of the Republic Resolution no. 48/2013, of 4 April, recommending for the Government to adopt measures to effectively defend and enhance women's rights in the world of work;

Considering Assembly of the Republic Resolution no. 46/2013, of 4 April, recommending for the Government to create a national campaign promoting the enlightenment of women about their rights in the labour world, as well as employers about the need to promote Gender Equality in the world of work;

Considering Assembly of the Republic Resolution no. 45/2013, of 4 April, recommending for the Government to activate the necessary mechanisms to combat direct and indirect wage discrimination;

Considering Council of Ministers Resolution no. 19/2012, of 8 March, determining the adoption of measures to promote Gender Equality in management and supervisory positions in state-owned companies;

Considering Council of Ministers Resolution no. 70/2008, of 22 April, approving the State's strategic guidelines for the State business sector as a whole;

Considering Council of Ministers Resolution no. 49/2007, of 28 March, approving good governance principles for companies in the State business sector;

Considering the European Commission's Gender Equality Strategy: Towards a gender-equal Europe 2020-2025 , which sets out the main actions to be taken over the next 5 years and commits to ensuring that the gender perspective is mainstreamed in all EU policy areas;

Considering the importance of business organisations' contribution to a fully democratic and inclusive society, as well as the advantages of integrating a Gender Equality perspective in all areas of the company, MCretail SGPS, S.A., represented by Isabel Sofia Bragança Simões de Barros, Executive Director, commits to:

- 1. Implementing the attached Action Plan for Equality between Women and Men;*
- 2. Allocating all necessary resources for implementing this Plan.*

Matosinhos, 15th September 2023

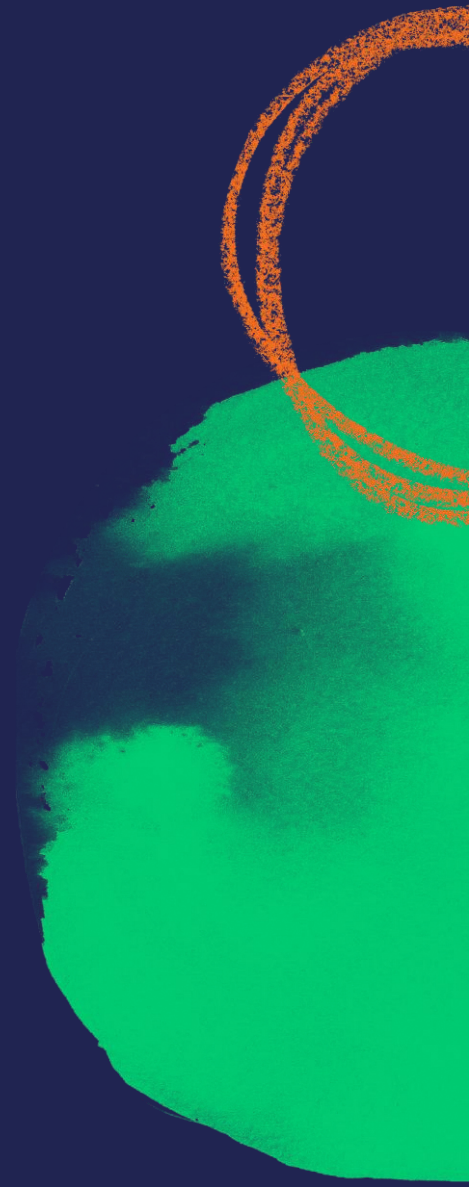
Isabel Barros

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01.

Introductory note

The Gender Equality concept translates into equal rights, freedoms and opportunities between women and men with the aim of providing equal valorisation, acknowledgement and participation in all spheres of public and private life.

This is a concept that has been receiving particular attention from the main international institutions over the last few years, and which has also been formally highlighted in Portugal.

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

This obligation was later extended to listed companies through Law no. 62/2017, of 1 August, which approves the gender-balanced representation system in the management and supervisory bodies of public business sector entities and listed companies, stipulating in article 7 the obligation to prepare and display annual equality plans.

Law no. 62/2017 has also established the representation quotas of both genders of 20% for listed companies, as from the first elective general meeting occurring after 1 January 2018, and of 33.3%, as from the first elective general meeting occurring after 1 January 2020, with regard to all directors (executive and non-executive).

Although MCretail, SGPS, S.A. (hereinafter referred to as MC) is not currently a listed company, it nevertheless considered that the relevance of this issue should also warrant its particular attention and drew up (I) a comprehensive diagnosis on the issue, as well as (II) its own equality plan.

In terms of diagnosis, the main readings revealed that:

- The commitment to diversity, and in particular to Gender Equality, is historically rooted in MC's organisational identity, being part of its DNA but also of the main strategic and cultural documents.
- In practical terms, this commitment is instantiated daily in the integrated human resources management practices and processes, encompassing dimensions as comprehensive as the investment in attracting people under the principle of equality and non-discrimination, the evaluation of employees' performance through a meritocracy culture, cross-cutting and equal access to training opportunities, or the creation of career opportunities that promote the retention of diverse profiles.
- Particularly noteworthy are leadership roles (coordinators and supervisors), which are mostly held by women. On the other hand, men have a greater weight in leadership roles, although we recognise that there is still a long way to go to reverse this trend.
- Seeking to move towards a better gender balance in the organisation at all levels, MC has also entered into relevant agreements at national and international levels, establishing concrete representation goals and objectives.

MC has also developed a multilevel equality plan, towards a short- and medium-term horizon, which aims to develop increasingly inclusive people management policies, to make leaders aware of the topic so that they assume an active role in their implementation and to introduce this critical dimension in the decision-making processes in a more structured and recurrent way.

In drawing up this plan, as has been the case in previous years, different employees were involved, representing the various organisational levels, as well as the diversity of experiences and backgrounds relating to this topic. A wide range of internal and external documents on the subject (national and international) was also used, following with particular care the guidelines contained in the 'Guide for implementing equality plans for companies'.

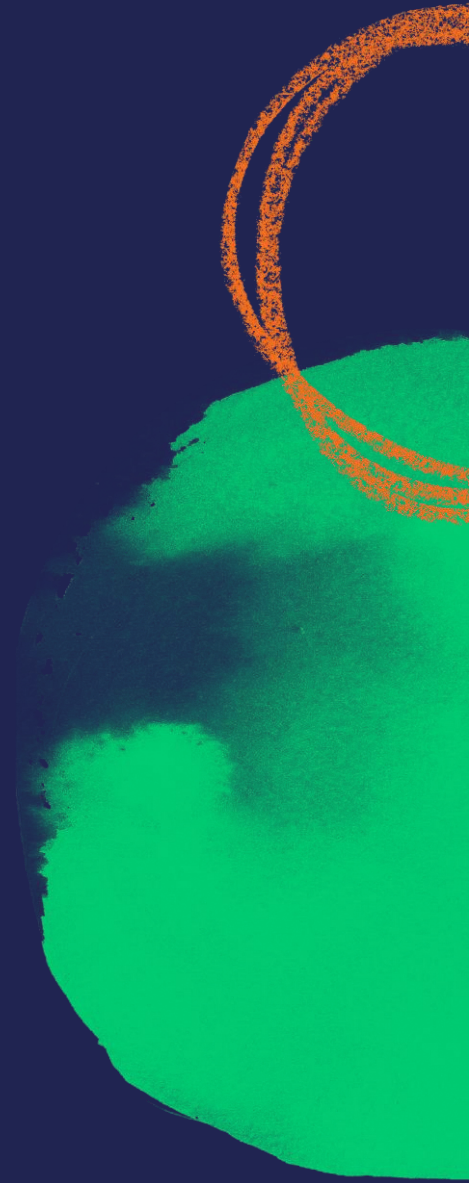
This way, MC intends to once again demonstrate its commitment to meritocracy in all its forms and undertakes to develop its best efforts to vivify all these guidelines in the effective working practices all its teams demonstrate.

Finally, it is important to mention that the implementation of the equality plan will be accompanied by a systematic monitoring and continuous improvement process.

02.

Self-Diagnosis -

**'Understanding gender
equality at MC'**



A. Company Strategy, Mission and Values

The first component of the self-diagnosis process carried out by MC sought to analyse business practices regarding Diversity, Equity and Inclusion, in particular regarding Gender Equality, in light of the organisation's strategy, identity and culture vectors, based on the respective formal supporting documentation.

In this regard, it should be noted that MC places considerable emphasis on diversity, identifying it undoubtedly as one of the structural vectors of its success, intrinsically related to the evolution, growth and diversification of its business. The commitment to diversity at MC thus assumes a prominent role, seeking to be a reflection of society and its customers, particularly in leadership positions. To ensure this, MC seeks to actively encourage inclusion throughout the organisation by managing and evaluating its employees in an impartial manner and promoting equitable opportunities for everyone, regardless of their role and organisational background, as well as their gender, ethnicity, age, religion or sexual orientation.

Historically, MC has sought to encourage these values through the proactive and recurrent development of a wide range of initiatives, ensuring that the topic is always at the top of the agenda. In parallel, MC has systematically monitored the evolution of a wide range of indicators which, among other objectives, aim to feed the discussion on inclusion and diversity in the company's planning and management forums, serving as a starting point for designing action and improvement plans in this area.

In particular with regard to Gender Equality, MC has acted on several strategic lines, highlighting its investment in developing its talents, through an approach aimed at sustainability with regard to gender balance.

MC's public commitment to Gender Equality is also reflected in its Code of Ethics and in the Values and Principles that guide its way of being in life and in business, most notably the following:

- “We move forward together” and value everyone's talent. We learn from each other's skills, knowledge and different points of view to put the best ideas into action.
- “We embrace and celebrate heterogeneity”, acknowledge the enormous value of diversity in its various dimensions and are committed to seeing it represented in the organisation. (...) We want our teams to reflect the plurality of our group, in its different businesses, functions and geographic locations. We promote an open, equitable and inclusive culture. We value different perspectives, visions, experiences and journeys, inside and outside the organisation. We acknowledge the merit and unique contributions of each person who, collectively, take us to new levels of performance. Together we go further because the whole is greater than the sum of the parts.

Regarding its scope, MC's Gender Equality policy and this Plan cover all companies directly or indirectly owned or controlled by MCretail SGPS, S.A.

The principles of MC's Gender Equality policy apply to the employees and to members of the governing bodies of the above-mentioned companies, and also extend to other stakeholders with whom MC interacts.

B. Diversity, Equity and Inclusion Strategy

B.1 Axes

MC considers it essential to address Diversity and Inclusion separately and to prioritise the dimensions it intends to develop. In view of the company's reality, culture and strategy, as well as legal imperatives and external forces, it was decided that the axes of this Diversity, Equity and Inclusion strategy would be:

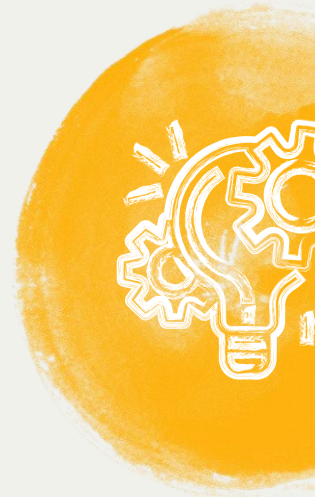
1. Gender;

2. Disabilities;
3. Nationalities and ethnic groups;
4. LGBTIQA+ and
5. Generations.

The first two axes have been addressed as a priority.

Gender Equality is one of the most relevant topics in the pursuit of the company's strategy and culture, and is developed in 4 areas of action:

- a) Employment and Education;
- b) Balance between personal and professional life;
- c) Social Protection and
- d) *Visibility/role models.*



B.2 Manifesto

MC believes that an inclusive environment implies respect for and acceptance of all and the creation of conditions for everyone to contribute with their different potential, beliefs, background and ways of working.

As such, based on the values of equality, respect and acceptance of the other, a movement has been promoted that will contribute to an even safer, more sustainable and equitable environment.

MC reaffirms its commitment to strengthening its intentionality in promoting the **uniqueness** of our people, united in a common purpose to develop a sense of belonging and a culture where everyone feels valued and respected.

B.3 Principles

MC's Diversity, Equity and Inclusion Strategy is developed based on 3 principles:

1. *Diversity, Equity and Inclusion are **everyone's responsibility** and **benefit** the entire organisation;*
2. *Promoting equity versus equality; and*

3. Promoting **uniqueness** as a catalyst for sustainable personal and professional development by ensuring that everyone:

- Feels respected;
- Feels valued for their strengths; and
- Trusts the organisation.

Uniqueness as the consideration of *the* person in their individuality is also the answer to intersectionality; i.e., the different dimensions of diversity are increasingly not watertight realities but they overlap, creating specific situations that have to be addressed.

C. Human Resources Strategy

The other component analysed as part of the self-diagnosis conducted by MC covered a sensitive area with regard to identifying policies and practices in the Gender Equality - Human Resources Management area. As part of this, axes such as recruitment and selection, continuous training, career management, conciliation between personal and professional life, workers' participation, internal and external communication, among others, were assessed.

C.1 Attracting, developing and retaining talent

MC's commitment as a diverse and inclusive organisation, able to promote, attract and integrate people with different profiles and backgrounds, always bearing in mind the fulfilment of the dimensions on which our Diversity, Equity and Inclusion strategy is based.

With regard to gender diversity, MC seeks to promote it throughout the life cycle of its employees.

With the ambition of seeing each of its people in their singularity, MC promotes an integrated and inclusive management of human resources, based on three distinct pillars: (i) attracting, (ii) developing and (iii) retaining diverse and differentiating profiles.

Attracting: investment 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 recruitment processes, it is recommended that whenever recruiters present a short list to the business, it should be balanced in terms of gender representation. Throughout their professional career, the aim is for this diversity of profiles and characteristics to be maximised and strengthened, so that employees are better prepared to respond to the multiple challenges that the business imposes.

. It is also proposed that, at all company levels, teams should not be made up of only one gender members. We have set our own recruitment targets for each area/internal department to ensure that gender balance is achieved faster.

Development: is one of the pillars of the talent management model and an area of constant investment. Essential to be able to develop employees personally and professionally and, at the same time, enhance the amplification of skills necessary for business development. A meritocratic culture where the differentiation of the performance and contribution of people and teams is backed by recognition processes and tools. Performance and talent evaluations, promotions, salary reviews and voluntary leaves are monitored by gender, in order to ensure correct management in all teams. With regard to training, it is ensured that access is cross-cutting and equitable throughout the company, covering the different functions, generations and geographic locations. In this process, an increasingly active role is being given to employees, by offering them the possibility of deciding on the topics/competences they consider relevant to develop and of enrolling independently. Also in this context, it is particularly important to promote structural training in Diversity, Equity and Inclusion for different audiences, both in unconscious bias (awareness and respective mitigation plans), and specifically in each of the DE&I dimensions, with the aim of creating a more inclusive environment. In 2021, MC provided e-learning for the entire organisation, with the aim of raising awareness and creating a common language. In 2021, MC developed e-learning which is available to the entire organisation, with the aim of raising awareness and creating a common language. In 2022, we developed a training module on unconscious bias specifically for recruitment teams, and we are preparing training on this subject for leaders focused on mitigation strategies. It is also necessary to consider the promotion of specific training for segmented publics, with a view to

accelerating careers and/or mitigating the effects of intersectionality. Also in this context, MC continues to promote specific training that contributes to the acceleration of women's careers, namely the PROMOVA programme, an initiative developed by CIG and NOVA SBE, which combines more formal methodologies with mentoring and coaching and which has greatly contributed to developing the women who participate.

Retention: aims to align the personal and professional expectations of employees with the strategic objectives of the business, guiding the organisation's behaviour by the principle of Gender Equality. The career model seeks to support the management of the current talent flow, as well as to respond to medium-/long-term needs and challenges. The implementation of this pillar is also inseparable from the policies that will be addressed below, namely the Conciliation between work, family and personal life/ Work organisation, Climate/Employees and Internal and External Communication.

C.2 Conciliation between work, family and personal life / Work organisation

MC continues to develop the Improving Our Life movement, which is a set of initiatives aimed at ensuring the well-being and involvement of our employees. There are many initiatives developed in this area, such as **Flex it Up 2.0**, a programme focused on flexible working. This programme encompasses 5 initiatives ranging from remote working to flexible hours, while covering extra vacation days, flexitime and/or reduction of working hours, extending access to unpaid leave for purposes other than those legally provided and Flex Friday, i.e., the possibility of distributing the schedule during the week and having Friday afternoon free. MC is aware of the need to create conditions so that women can have the same opportunities as men, and the compatibility between personal and professional life is imperative for women. This is, in fact, evidenced by the numbers of adherents to the different initiatives, as about 80% of the requests were made by women. This programme also contributes to maternity and paternity protection, as well as to family assistance. Flex it Up 2.0 is a best practice often used as benchmark by national

and international companies, presented at WBCSD 2020 (World Business Council for Sustainable Development). The programme also had a digital stand in the Marketplace of the 2021 annual conference of the LEAD Network, as it was seen as an enabler for the Gender Equality axis..

For each person to be able to develop and give their best, it is important to create the conditions for this to happen. This is one of the reasons why the well-being topic is so relevant at MC. To strengthen the well-being of our people, it is essential to know their experience in depth, give them a voice and build solutions together. To do so, the ecosystems of the three realities that make up MC (Central Structures, Store Operations and Logistics) were mapped out, with the objective of knowing the life cycles of our people and their experience at every moment. This is the only way to improve the various phases and challenges that make up those cycles, always bearing in mind that the management of personal and professional life takes on a central role.

With the aim of caring for and valuing our people, MC pays particular attention to developing conditions that promote the reconciliation of professional, personal and family life, by offering a wide range of benefits and services. Among the various initiatives, we highlight the following: the flexible benefits programme, which facilitates its adaptation to the life cycle of each employee; the allocation of a telecommunications plan with voice and data (permanent employee), which enhances access to internal and external communication; health insurance applicable to all our people with a permanent contract; access to advantageous and competitive family health plans for both genders; the More Sonae Advantages programme extendible to the family, which consists of a very extensive network of partnerships and relevant discounts in different areas and services, ranging from well-being and health, to sports, telecommunications, training and education, shops, culture and leisure, among many others.

To facilitate awareness of the benefits and advantages programme and leverage its use, MC also developed digital means accessible to everyone, from a truly inclusive perspective, through an app and a chat bot that allows you to get to know, explore and take advantage of the benefit and advantage plans and even ask questions, at all times and from anywhere.

Aimed at the social protection of MC's employees, in situations of economic and social vulnerability, the Somos Sonae Programme is the result of a strategic partnership with the Portuguese Red Cross and represents MC's strong commitment to fulfilling its role in corporate social responsibility.

This programme operates along different lines, including financial and legal support, psychological support, oral health, support for victims of domestic violence, and financial literacy programmes, all available to employees and families. Through its intervention plans, it aims to support our people in vulnerable situations, allowing them to regain their dignity and confidence and to restructure and empower their autonomy, thus making a vital contribution to achieving the objectives of MC's Diversity, Equity and Inclusion strategy.

Bearing in mind the importance of promoting merit, equal opportunities of access and success, and respect for individuality, we also provide, in partnership with the Belmiro de Azevedo Foundation, a programme of school prizes and study grants aimed at recognising merit and encouraging the academic progress of the daughters and sons of our people attending Regular Education and Inclusive Education programmes.

C.3 Climate

MC periodically conducts an internal survey on a set of dimensions considered relevant to satisfaction and commitment, including issues relating to gender diversity, and in 2022, an inclusion index was developed for the first time, which will provide information about areas where MC needs to intervene in the future. In addition, it conducts focus groups with the objective of furthering the feedback collected and, simultaneously, obtaining the active contribution of our people in the construction of new initiatives, which allow mitigating the aspects referred to as less positive and, at the same time, expanding the points flagged as positive.

In addition, MC carries out the annual Lead Better Score bottom-up consultation process that provides essential feedback for developing its leaderships.

C.4 Internal and External Communication

MC bases its communication on an inclusive and non-discriminatory language, in advertising, promotion of its activities, products and services, as well as in its relationship with its employees. To this end, an inclusive communication manual was developed and the recruitment manual was revised. Training initiatives for recruitment teams and leaders are also planned.

Additionally, MC is associated with events, studies, national and international networks and other external initiatives aiming to promote Gender Equality. Among other strategies, these initiatives disseminate role models (internal and external).

In 2020, MC launched the first Gender Equality campaign spearheaded by female employees of the company. Facts and figures based on national and international studies were disclosed, showing how Gender Equality is still not a reality, also integrating a call to action, inspiring each person to take responsibility for changing attitudes.

Furthermore, an internal support programme for victims of **domestic violence** was launched under the motto 'You are not just one, you are one of us', which aims to **raise awareness** among the entire MC population (more than 38,000), but also to **intervene** with a set of concrete support measures and training. Every year, MC reinforces the communication of this programme, with 93% of requests for support coming from women.

In addition to internal initiatives, we have supported the publicising of campaigns against domestic violence by the CIG - Commission for Citizenship and Gender Equality, using different channels such as LED screens at service desks or in-store sound systems.

We developed two editions of a in-house podcast #PoderFalarÉPoderSer, the first at the end of 2021, on Disabilities, with Catarina Oliveira, an activist whose mission is to demystify ableism; and the second, in June 2022, on LGBTQIA+ with the author of the Gayme Changer, Jens Shadendorf, a book that reflects on the importance of addressing this dimension in the corporate world and the advantages of having an inclusive culture where everyone feels respected. In 2023, MC's DE&I strategy appears as a case in the Portuguese version of the book.

MC has participated in various conferences and webinars on Gender Equality, namely: 'National forum against domestic violence'; 'D&I inclusão no mercado de trabalho: a perspetiva das organizações', promoted by HAYS; 'Jornadas da inclusão' at Madeira, held by GRACE; conference on 'Liderança Feminina' at Porto and Lisbon; 'Diversidade: a mudança necessária' and the webinar 'As one for diversity, equity and Inclusion – uma década de evolução em Portugal', both invited by MERCK; 'Valorizar as mulheres na economia' promoted by CIP; 'Grande Conferência Negócios Sustentabilidade 2021' and PBS's 'Clube Women in business' event; Lead Netwok 2022 Conference in Paris; Employability in Transformation (University of Porto); International Women's Day: Women keep creating value as part of the 'Engenheiras por um dia' programme in partnership with the INCoDe 2030 Programme (University of Coimbra) and Happy Conference - Taking the road to inclusivity.

Finally, MC has contributed to external cross-cutting studies such as McKinsey's Woman Matter , which will have a specific edition on the Iberian Peninsula in 2022.

In addition, MC's Diversity, Equity and Inclusion strategy was awarded the honourable mention of the Seal of Diversity by the APPDI association at the end of 2021.

In 2023, on the occasion of International Women's Day, we launched a gender campaign called #PODERSER with the aim of demystifying gender prejudices related to men and women.

D. Main indicators, targets and commitments subscribed to

In order to ensure a more complete reading of the organisation's *status quo* on this matter, in addition to the self-diagnosis that was carried out, some key metrics regarding the current gender distribution in the organisation, as well as the main commitments and goals subscribed to by MC to balance the representativity between women and men in the short/medium term, were systematised.

D.1 Indicators to characterise the current situation

Statistical data on gender in MC's labour context, based on information collected until September 2022, show that it has continuously reinforced its commitment to increasing the number of women in leadership positions, both through recruitment and promotions.

The Gender Equality target set by MC is to reach 40% of women in leadership positions by 2023. This target was effectively achieved this year, with 40.5% of leadership positions now being held by women.

D.2 Partnerships

MC considers that the diversity of women and men in decision-making positions is a critical factor for organisations' balance and has set ambitious targets for representation.

To this end, it has been signing some relevant agreements in this area and developing an outstanding number of actions:

i. ERT - Women Initiative

As part of the *European Round Table of Industrialists (ERT)*, in 2013, Sonae signed the *Women Initiative*, which embodies the organisation's concern for gender parity with the establishment of voluntary targets to facilitate the promotion of greater gender diversity, not only for positions in management and decision-making bodies but also for senior and middle management positions..

This initiative aims to go beyond the mere reporting of targets, focusing on promoting workshops to present, discuss and share practices implemented by the companies represented at this forum - *ERT Diversity Task Force*.

ii. Commitment with the Portuguese Government

In October 2015, Sonae signed a commitment with the Portuguese Government to maintaining the level of representation of the under-represented gender on the board of directors above 30%. This agreement provides for the internal development of staff of the under-represented gender throughout Sonae's various leadership levels, so that its shareholders can maintain the level of representation on the board of directors above 30% in the future. This agreement falls within the scope of Council of Ministers Resolution no. 11-A, of 6 March 2015.

iii. LEAD Network - Leading Executives Advancing Diversity

Involvement in the European LEAD network since 2015, specifically dedicated to the attraction, retention and advancement of women in the retail and consumer goods sector, with a view to enhancing gender diversity in organisations. In this context, MC has actively participated in the various seminars, training and events promoted by the network, where there is room for sharing best practices by representatives of the various member companies. MC was part of a pilot initiative dedicated to studying the skills portfolio, which made it possible to positively differentiate women in Management/Store Management positions and participated in the Lead Network Partner 2018.

In addition, it has participated in training related to leadership (Inclusive Leadership) and inclusive recruitment, having participated in the virtual conference in 2020 and 2021, and in the in-person conference in 2022. In addition, MC continues to take part in an international mentoring programme with women mentors and mentees to speed up the development process.

In this regard, in 2021, CEO Luis Moutinho signed the CEO Pledge, an international commitment to Gender Equality, and was the only Portuguese company to join this initiative.

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

In November 2018, Sonae signed the first European commitment to inclusion and diversity, transversal across several industries, the Pledge Embrace Difference (Diversity&Inclusion). This commitment aims to encourage the creation of an appropriate working environment and conditions so that everyone in the organisation can reach their maximum potential, through: inclusive culture and leadership, setting goals and objectives, clarification of responsibilities, equal opportunities, involvement and social responsibility.



03.

Action plan - 'From
diagnosis to
implementation'

The self-diagnosis carried out by MC made it possible to objectively identify the strong points and the current areas for improvement of the organisation in Gender Equality, having served as a basis to establish the set of measures included in the action plan to be presented next.

In this context, it should be mentioned that MC's decision-makers are fully aware that there is still a way to go in terms of gender diversity and intend to increase the percentage of women in management positions for the next few years.

i. Policies and Project Team

MC has a project team with people from the different business areas, which meets on a weekly basis and develops the most relevant initiatives and projects, in that year, related to the diversity axes of the DE&I strategy. In addition, the DE&I initiatives are followed up in the HR Advisory Group, a cross-cutting group that brings together all companies of the Sonae group.

In this context, every year an in-depth diagnosis of the current situation is made, based on the various structuring stages of talent management (attraction, recruitment, development, progression and retention). This diagnosis underpins the construction of a multi-level intervention plan, which includes actions already underway, as well as initiatives to be implemented in the short and medium term. In this plan, the focus is on the people management policies, on the leaderships responsible for their execution and on the monitoring of their implementation.

This team ensures that MC's people management policies, whether new or in the process of being revisited, are inclusive and capable of ensuring equality between women and men.

Examples of actions:

- Promote the establishment of strategic partnerships with stakeholders from different quadrants of the community, seeking to capitalise on the transfer of good practices;
- Encourage the application and selection of men or women for positions/professions where they are under-represented;
- Integrate in the training plan modules related to gender equality topics (e.g. unconscious bias), also incorporating this concern in the remaining general and technical training, namely in training courses aimed at preparing leaders and onboarding programmes;

- Encourage the review of succession plans seeking for them to comprise a diversified pipeline of potential candidates;
- Ensure the continuous implementation of 50:50 candidate *short lists in the recruitment of leadership positions*;
- Create opportunities and career paths that promote diversity in attracting and retaining talent (role models);
- Develop career development and management programmes for the under-represented gender, comprising specific and more personalised monitoring;
- Accelerate the operationalisation of *flexi-work* initiatives, seeking for them to gain traction to promote a more balanced work environment.

ii. Leadership

Raise awareness and train leaders, at the various organisation levels, to effectively implement the outlined policies.

Examples of actions:

- Establish management forums at different levels to formalise the monitoring of the implementation of Gender Equality policies, making leaders responsible and committed to the success of their execution;
- Develop and implement training sessions, awareness-raising and mentoring initiatives that prepare leaders to manage teams diversity and Gender Equality;
- Enhance the impact of MC leaders' role models to disseminate inclusive and gender-equality promotion practices;
- Encourage employees to make suggestions in the field of equality between men and women;
- Implement communication, debate and sharing channels dedicated to the Gender Equality topic in its different dimensions;

- Stimulate sharing and *networking* networks that promote equal visibility and access to top management for different genders;
- Specific training in unconscious bias for leaders - face-to-face and online training;
- Mental health training - Well-being is one of the pillars of MC's Employee Value Proposition: the organisation has always taken care of the well-being of its employees in an integrated and complementary way, providing various initiatives and support to make everyone aware of the importance of balance and a holistic view of the issue. It is a theme that has been addressed in the different dimensions of employee well-being. This is how the 'Precisamos Falar' Programme was born in 2021, with the aim of having employees informed about the importance and impact of well-being in their lives, providing tools so that they can improve their mental well-being and training employees to be attentive to their own signals and those of others. The programme is based on 3 axes: awareness, information (podcasts, videos) and training (among the various formats with a specific Training for Leaders entitled 'Precisamos Falar sobre Saúde Mental', made up of 4 modules: Demystification / Warning signs / Awareness / Strategies for action.

iii. Monitoring and Reporting

Consider, in decision-making, indicators that effectively reflect the current situation and evolution of the company in terms of Gender Equality.

Examples of actions:

- Monitor and report on Gender Equality indicators on a recurrent basis throughout the employee's life cycle in the organisation, including all human resources policies;
- Carry out periodic surveys in order to assess the perception regarding the different Gender Equality dimensions in the organisation, involving the largest possible number of employees, from the most varied hierarchical levels;
- Conduct recurrent benchmarking studies to monitor the evolution of relevant gender equality metrics against national and sectoral peer groups;
- Share relevant Gender Equality indicators with the employees, through proper channels;

- Publish specific documentation on Gender Equality, which allows for a more in-depth follow-up of selective dimensions of this topic, ensuring greater external visibility and executive commitment;
- Measure participation in the training of people of different genders within the same performance level, seeking to mitigate any asymmetries.

The implementation of MC's equality plan will be subject to a systematic follow-up process in order to monitor the effectiveness of the actions and the achievement of the objectives, identifying potential improvements or new measures to be implemented.

In conclusion, it is important to highlight that MC, as an agent with an active role and intervention in society, believes that its ambition should go beyond organisational boundaries, seeking to act as a catalyst capable of positively influencing the different stakeholders with whom it relates, so as to drive a systemic change in the current Gender Equality paradigm.



04.

Approach to the guide
for preparing equality
plans

Among the vast information and documentation produced and made available by the Commission for Equality in Labour and Employment, the Guide for Preparing Equality Plans stands out for its relevance to this document. Thus, this was necessarily one of the key elements for preparing this Gender Equality Plan.

In general terms, MC considers that, following the effort made over the last few years, it has addressed the main goals and measures presented in the Guide, particularly with regard to non-mandatory measures, something that is evidenced by the concerns and initiatives already set out throughout this document. To this extent, the monitoring support matrix for implementing the plan focuses exclusively on the measures of mandatory nature. MC strives for strict compliance with all legal obligations, being aware of the role it plays in society and, above all, in the eyes of its employees. This conviction is shown in the certainty that every effort is made on a daily basis in order to ensure compliance with all relevant legal provisions.

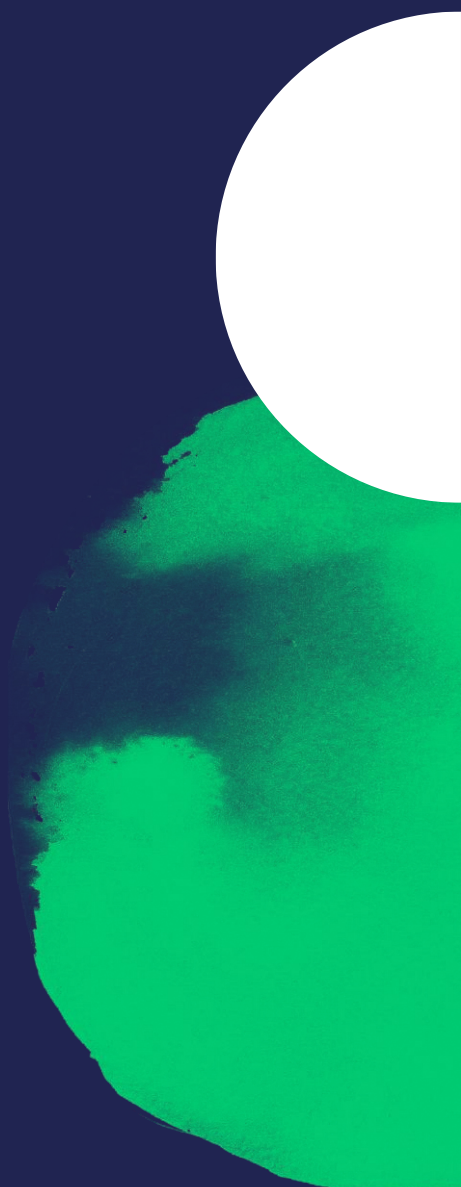
In addition to the previous notes on the matrix, it should also be noted that MC opted for a different and more synthetic approach, insofar as there are common points in relation to all the measures referred to therein, namely with regard to identifying those responsible, the budget and indicators. In fact, MC has internally adopted an Equality Policy that addresses all aspects related to Equality and Non-Discrimination within the group companies. The aforementioned document presents contents that coincide with the topics addressed in the aforementioned Guide. In addition, its adoption implied an in-depth analysis and review of MC group's reality.

Regarding responsible entities, due to the structure that was created to coordinate the Gender Equality Plan, as well as all the measures related to non-discrimination and equality, the responsibility for implementing and verifying all measures is shared among the following teams:

- a) **Diversity, Equity & Inclusion** - team responsible for the general and strategic coordination of all issues related to diversity, equity and inclusion and which was specifically created for this purpose.
- b) **Human Resources Department** - area that encompasses all teams related to human resources management and includes, among others, the teams responsible for selection and recruitment, vocational training, career development and advancement, communication, workplace health and safety, among others. The Analytics area warrants particular notice, and is responsible for developing, implementing, adapting, monitoring and processing the information resulting from the indicators created.
- c) **Legal Department [Employee & Labour Relations]** - area responsible for all legal-labour support and its implementation, managing and supervising all processes in this area.

Besides the more immediate intervention of the aforementioned teams, other areas may be called upon which, incidentally or naturally, should be involved in certain measures. In fact, the plurality of perspectives is totally necessary to truly achieve equality, in both gender and universal terms. Even so, coordination is always ensured by the Diversity Equity & Inclusion team, which ends up concentrating all information and data transversal to the Gender Equality policy.

With regard to the budget earmarked to comply with the measures set out in the Guide, the financial support available for implementing the measures stems mainly from the allocation of human resources dedicated to Diversity, Equity and Inclusion. Additionally, all the advertising support elements, as well as the initiatives developed on Gender Equality, are supported by the budget of each team. Therefore, it is possible to conclude that there are more than enough and adequate resources to guarantee the effectiveness of the implemented measures.



04.1.

Annex - support matrix for implementing the equality plan

MEASURE	OBSERVATIONS
DIMENSION: COMPANY STRATEGY, MISSION AND VALUES	
1	<ul style="list-style-type: none"> • Procedure in place, implemented and continuously monitored. • Internal procedure created and information made available to all employees.
DIMENSION: EQUAL ACCESS TO EMPLOYMENT	
SUB-DIMENSION: ADVERTISEMENTS, SELECTION AND RECRUITMENT	
2	<ul style="list-style-type: none"> • Procedure in place, implemented and continuously monitored. • A manual and specific training for the recruitment task has been developed. Thus, advertisements must comply with the established prerequisites. • Continuous efforts are made to ensure greater effectiveness of the guidelines on this matter, notably by regularly assessing the content of job advertisements and other forms of advertising related to pre-selection. • Following on from the previous point, it has also been established that advertisements should be designed to cover both genders. • These publications are checked periodically. • There is a procedure that guarantees the collection, safekeeping and recording of the recruitment processes carried out, broken down by gender. • As part of the selection and recruitment process, information is provided on the functions that will be performed and the salary expectation is also communicated. • There are internal procedures and rules that guarantee effective protection of the health of pregnant workers and workers who have recently given birth or are breastfeeding, as well as respect for all the rules related to the probation period.
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SUB-DIMENSION: NON-RENEWAL OF FIXED-TERM CONTRACTS	
7	<ul style="list-style-type: none"> • Procedure in place, implemented and continuously monitored. • The return of absent employees occurs naturally in the organisation, with respect for their rights.
DIMENSION: INITIAL AND CONTINUOUS TRAINING	
8	<ul style="list-style-type: none"> • Procedure in place, implemented and continuously monitored. • The disclosure of training initiatives is based on the criterion of their relevance to the functions performed or result from some legal obligation, and therefore does not contain any discrimination or gender-based specification.

9	<ul style="list-style-type: none"> Procedure in place, implemented and continuously monitored. The number of hours established by law are guaranteed to all employees, without any gender-based differentiation..
10	<ul style="list-style-type: none"> Procedure in place, implemented and continuously monitored.
11	n.a.

DIMENSION: EQUALITY IN LABOUR CONDITIONS

SUB-DIMENSION: CAREER PROMOTION/ADVANCEMENT

12	<ul style="list-style-type: none"> Procedure in place, implemented and continuously monitored. The indicators correspond to those already presented.
13	

SUB-DIMENSION: WAGES

14	<ul style="list-style-type: none"> Existing procedures, implemented and continuously monitored. Existence of a remuneration policy that takes into consideration the analysis of the functions, structured in a relevant and non-discriminatory manner, and which is based on objective criteria and with respect for the 'equal pay for equal work or work of equal value' principle. The functional contents of the organisation's jobs and functions are identified, as well as their description, whose parameters are common and independent of the predominance or not of a certain gender. Periodic and careful monitoring, in order to verify that parenthood-related rights are considered effective provision of work, for the purposes of attributing productivity and attendance bonuses. Salary information is disclosed in accordance with the requirements of the Single Report and according to the intended purposes.
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DIMENSION: PARENTHOOD PROTECTION

SUB-DIMENSION: SHARED LEAVE/LEAVES

22	<ul style="list-style-type: none"> Existing procedures, implemented and continuously monitored. Close and continuous monitoring of the health and safety of pregnant workers and workers who have recently given birth or are breastfeeding, including in situations of high-risk pregnancy.
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SUB-DIMENSION: DISMISSALS; ABSENCES		
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37	·	Existing procedures, implemented and continuously monitored.
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SUB-DIMENSION: REDUCTION OF WORK TIME		
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42	·	Existing procedures, implemented and continuously monitored.
SUB-DIMENSION: PROTECTION OF THE SAFETY AND HEALTH OF PREGNANT WORKERS AND WORKERS WHO HAVE RECENTLY GIVEN BIRTH OR ARE BREASTFEEDING		
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44	·	Existing procedures, implemented and continuously monitored.
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SUB-DIMENSION: PROTECTION IN THE EVENT OF THE DISMISSAL OF WORKERS WHO ARE PREGNANT, RECENTLY GAVE BIRTH, ARE BREASTFEEDING OR ON PARENTAL LEAVE		
47	·	Procedure in place, implemented and continuously monitored.
SUB-DIMENSION: COMMUNICATION REGARDING THE NON-RENEWAL OF A FIXED-TERM CONTRACT WITH WORKERS WHO ARE PREGNANT, RECENTLY GAVE BIRTH, ARE BREASTFEEDING OR ON PARENTAL LEAVE		
48	·	Procedure in place, implemented and continuously monitored.
SUB-DIMENSION: ORGANISATION OF WORK TIME: FLEXTIME OR PART-TIME WORK		
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51	·	Existing procedures, implemented and continuously monitored.
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SUB-DIMENSION: ABSENCES		
55	·	Existing procedures, implemented and continuously monitored.
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SUB-DIMENSION: EXEMPTION FROM CERTAIN FORMS OF WORK ORGANISATION AND OVERTIME WORK		
57	·	Existing procedures, implemented and continuously monitored.
58		
SUB-DIMENSION: TELEWORKING		

59	n.a.
SUB-DIMENSION: CONTINUOUS WORK HOURS (ONLY FOR COMPANIES IN THE STATE BUSINESS SECTOR)	
60	n.a.
61	n.a.
DIMENSION: PREVENTION OF HARASSMENT AT WORK	
62	
63	<ul style="list-style-type: none"> · Procedure in place, implemented and continuously monitored.
64	<ul style="list-style-type: none"> · By definition and inherence of functions, all aspects related to harassment practices are monitored by the Labour Relations Department.
65	<ul style="list-style-type: none"> · Cases of possible damage arising from occupational illnesses resulting from harassment practices are monitored by the Labour Relations Department, considering whether or not there is a need to pay for damages, in liaison with the Safety and Occupational Medicine Service.
66	<ul style="list-style-type: none"> · The situations of termination of contract with just cause are assessed by the Labour Relations Department.
67	<ul style="list-style-type: none"> · Existence of a code of conduct for preventing the practice of harassment from the moment it became mandatory by law, with provision for a specific procedure and the information that disciplinary proceedings will be taken.

 **MC**
Sonae

