

EQUALITY PLAN FOR 2025

(SEPTEMBER 2024)

1. Framework

Law no. 62/2017, of 1 August, adopting the scheme for a balanced representation of men and women in the Board of Directors and Audit Boards of corporate state-owned enterprises and listed companies, obliges listed companies to draw up and disclose annual equality plans. The goal is to effectively enforce equal treatment and opportunities between women and men, promoting the elimination of discrimination based on gender and making it possible to balance personal, family, and professional life, in accordance with Article 7 therein.

Semapa continues to believe that, more than compliance with a legal obligation, the pursuit of measures aimed at ensuring equality between women and men is an essential endeavour of socially responsible management; fostering a better performance of the organisation and helping attract and develop new Talent.

Consequently, the present Equality Plan, drawn up by Semapa, incorporates the provisions of Article 7 of Law No. 62/2017, of 1 August, and follows the guidelines in the "Guide for the Preparation of Equality Plans (annual)".

The present plan is an evolving document, which is reviewed and approved on an annual basis.

1.1. Semapa as a holding and as a separate company

As a holding company, Semapa consolidates the financial and non-financial information with its subsidiaries, as is required by law, but such consolidation does not and may not correspond to management consolidation.

Consequently, Semapa has a global and holistic overview of the entire economic group and exercises its shareholder functions in relation to its subsidiaries, by seeking to share common values and principles. This vision is reflected in the Deontological Principles (as it was called at the time), as adopted by the Board of Directors in 2002, later reviewed in 2023 and the name changed to Code of Ethics and Conduct. It highlights the obligation of non-discrimination, among others: *“In the company’s internal relations and with third parties, Semapa Employees must ensure equal and non-discriminatory treatment, namely on the basis of descent, gender, race, language, national origin, religion, political convictions or ideologies, education, economic situation or social status.”* This document stipulates the promotion of the approval of equivalent principles and rules by the companies controlled by Semapa, with the necessary changes to address the context and specificities of each company.

Furthermore, since the adoption of the Deontological Principles, Semapa has always deemed "equal opportunities" to be a critical and fundamental principle in labour relations, which is elaborated in our data on sustainability, an integral part of Semapa’s annual reporting.

Additionally, in 2017 Semapa adopted a Code of Good Conduct for Preventing and Combating Harassment in the Workplace, also applicable to all male and female Employees of the Semapa Group companies (unless they have a specific Code on this matter), which prohibits harassment in the workplace and sets out the obligations of all male and female Employees and employers in this regard, as well as the procedure to be followed in the event of harassment.

In 2021, Semapa and the main companies of the Group reinforced their commitment to the fight against discrimination through the creation of the Whistleblowing Channel, allowing the internal communication of irregularities, in an anonymous and confidential manner, by the members of the Corporate Bodies and Committees of the Company, shareholders, male and female Employees and candidates on the way to being hired, service providers, contractors and subcontractors, suppliers, male and female volunteers and trainees. Such communication includes, namely, the report of discriminatory practices regarding gender, thus allowing Semapa to act over situations that are not of its knowledge and better defend and ensure respect for the principles of equality between women and men.

On the other hand, Semapa adopted in 2023 its Human Rights Policy, where it undertakes to respect human rights, namely (i) the prohibition of discriminatory actions towards its male and female Employees on the basis of race, religion, gender, sexual orientation, disability, age, nationality, political convictions or economic or social situation, valuing diversity, equality and inclusion on grounds of sex, as a way of ensuring effective equal opportunities, namely with regard to people with disabilities, (ii) the prohibition of all forms of harassment, abuse and violence in the workplace, and (iii) access to dignified work, guaranteeing its female and male Employees a safe and healthy working environment, from a physical and psychological point of view, fair and equitable remuneration, personal development and continuous training, privacy of their personal data, respect for rest periods, access to applicable social protection schemes and respect for the right to parenthood and encouraging the reconciliation of working and family life.

In addition to this Group's vision and the intended alignment between the Group's companies, Semapa makes its individual choices as a separate company, which it will lay out in this Plan. The choices are such as deemed most appropriate to its reality and size while fostering the sustainable implementation of such measures in the company. All of this is carried out notwithstanding the obligation of reporting on such matters in consolidated terms in the aforementioned information on sustainability.

1.2. Diagnosis

Semapa carried out an *Engagement Survey* in 2023, which assessed 12 dimensions of the internal satisfaction. The results analysed by gender show that men score 5.6% higher than women across all dimensions.

After the analysis of these results by the teams and the Executive Committee of Semapa, a plan was drawn up, focusing mostly on the dimensions that highlighted the greatest room for improvement:

- Development
- Equality, Diversity, Equity and Inclusion

The Plan is being implemented, and four measures have stood out for their impact:

Measure One: Concerning Development, in 2024 all male and female Semapa Employees drew up their Individual Development Plan with their managers and the Talent department, where they highlighted the skills, they wished to develop. The company undertook, based on those Plans, to provide the conditions to meet each male and female Employee's needs. These Plans have been implemented in 2024 and they involve a wide range of actions, such as mobility to new functions, training or participation in special projects. We believe that this measure clearly grants both men and women at Semapa with equal development and professional growth opportunities. It thus fosters equal opportunities for men and women.

Measure Two: Concerning Diversity, Equity and Inclusion, in September 2024 Semapa will sign the Charter of Commitment to Diversity, Equity and Inclusion (DE&I) together with the Group companies, which will be disclosed to all the Group's male and female Employees. The commitments assumed and stated in the referred Charter rely on the following principles:(i) Sense of belonging, (ii) Non-

discrimination, (iii) Freedom of thought, (iv) Equal access to all levels of leadership, (v) Gender equality, (vi) Intergenerationality and (vii) Special needs.

We are aware and convinced that this initiative will further contribute to strengthening our culture free from discriminatory employment practices.

Measure Three: Making It Better Week: communicating better with all male and female Employees.

Since 2023 Semapa has dedicated a week to communicating and living our Purpose: Making It Better, doing things better every day than the day before, in every sphere of our activity.

Equal opportunities and equal treatment were the theme of both years.

- In 2023 we held a conference with a panel dedicated to the topic, directed at the Semapa Group's managers.
- On 26 September 2024, we will sign the Charter of Commitment to DE&I and we will disclose it to our male and female Employees through a leaflet with the commitments assumed in the Charter.

Equal opportunities and treatment have also been addressed and piloted with our partners, especially when subcontracting.

Measure Four: To develop a *Tableau de Board* of HR indicators that includes data on equality, diversity and inclusion.

The HR Analytics project is underway - the first phase expected to be completed by December 2024, which will allow us to measure rigorously and more frequently information on all aspects of human resource management, namely DE&I indicators.

It is a key project to implement/develop in 2025.

In addition to these measures, Semapa maintains in force some of the instruments highlighted in previous years, which help to keep the spotlight on opportunities for all and non-discrimination, amongst other matters (e.g: Annual *Talent Review*).

The following are some current figures on Semapa:

- Of the 38 male and female Employees at Semapa 60.53% are women and 39.47% are men, as of August 31st.
- Distribution by functional group:

Functional Areas	Women		Men	
	Number	%	Number	%
Directors	4	33%	8	67%
Senior Managers	9	70%	4	30%
Other	8	73%	3	27%

The figures show that Semapa’s workforce remains well balanced in terms of gender and is still working on an internal pipeline to progressively reinforce such balance, even among top management.

On the other hand, Semapa’s corporate governance is governed by the Principles for the Composition of the Governing Bodies, published on Semapa’s website, in which Semapa acknowledges *“the benefits of diversity in its social bodies, particularly in the Board of Directors and in the Fiscal Board. The diversity principles is a way of ensuring a greater balance in the composition of these bodies, of enhancing the performance of each member and, in each body as a whole, of improving the quality of the decision-making processes and of contributing to its sustainable development.”*

Thus, for *“promoting the diversity principles within Semapa, the Board of Directors accepts and acknowledges the following Principles of Diversity as appropriate for the composition of their respective social bodies:*

- *Inclusion of members with distinct academic qualifications and professional experience in different areas that are appropriate and relevant for exercising the role to be performed,*

- *Promotion of gender diversity,*
- *Inclusion of members of different ages, combining acquired experience and new perspectives,*
- *Inclusion of members with varied life experiences or geographical backgrounds.*

At the present date, the composition of the Board of Directors and the diversity criteria applied to it are as follows:

Diversity factor	Parameter	%
Age	< 50	37.50%
	50-65	25.00%
	>65	37.50%
Sex	Female	37.50%
	Male	62.50%
Education	Econ/Manag.	37.50%
	Engineering	25.00%
	Applied Mathematics	12.50%
	No degree	25.00%
Professional background	Professional experience abroad	37.50%
	Different sectors of the group	100.00%

The Audit Board consists of 66.66% men and 33.33% women.

Semapa maintained the Culture Working Group functional in 2024, in which male and female Employees from all levels of responsibility take part. The group has drawn up proposals in relation to the working environment and recognition, as an indication of the importance that Semapa awards to hearing male and female Employees about their experiences, namely in relation to matters such as inclusion.

The analysis to assess the existence or absence of a gender wage gap has been updated again, and last year's conclusion still applies at Semapa. There is significant remuneration equity between Men and Women with equivalent roles. We will continue to monitor this topic.

2. Equality Plan 2025

2.1. Dimensions of intervention

2.1.1. Company Strategy, Mission, and Values

Objectives	Measures	Managers	Budget	Indicators	Targets	Remarks
Acknowledging publicly (internally and externally) the commitment to promoting equality between women and men.	To include in all quote requests sent out to external suppliers Semapa's principles on equality between men and women.	Human Resources	No specific costs involved	Documentary evidence	Beginning in 2025 and continuing in the following years	
Ensure the implementation of the Equality Plan, and the control, monitoring, and sustainability thereof.	Measuring the implementation of the Plan using HR Analytics and analysing the follow-up indicators every six months by Semapa's Executive Board	Management Board / Human Resources	Dependent on the HR Analytics project (under development)		Have the Plan's first implementation indicators by March 2025	The HR Analytics Project is expected to be completed by Dec 24, which will provide us with more robust indicators on equality between

						men and women starting 2025
Encouraging male and female Employees to take part in the promotion of equality between women and men	Putting the topic of the Equality Plan on the agenda of team meetings, providing space for all male and female Employees to take part in the discussion	Board / Human Resources	No specific costs involved	Annual presentation of the Equality Plan for 2025 at a Board Meeting until the end of 2024	Provide proof of such presentation	
Recognising and giving equal visibility to women and men in all forms of language, internally and externally	Use of neutral, inclusive, and non-discriminatory (verbal and non-verbal) language in all documents and internal and external communication processes	Board / Human Resources	No specific costs involved	Documentary evidence (documents reviewed)	By 2025, development of guidelines for all staff to reinforce the use of inclusive language	

2.1.2. Equal access to employment

Objectives	Measures	Managers	Budget	Indicators	Targets	Remarks
Overcome structural barriers	Instructing internal managers and	Human Resources	No specific costs involved	Documentary evidence	By late 2025, 100% of	

<p>to the equality between women and men and fostering greater balance between women and men in the company</p>	<p>external entities in charge of selection and recruitment to guarantee a minimum representation of 40% of either sex among the applications during the company's recruitment process</p>			<p>Announcements made in 2025; Processes carried out</p>	<p>recruitment processes should follow the objective set under this measure</p>	
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2.1.3. Initial and Life-long Training

Objectives	Measures	Managers	Budget	Indicators	Targets	Remarks
<p>Promote a culture of equality between women and men in the workplace and fostering management and work practices in line with such culture</p>	<p>Promote training on equality on grounds of sex and diversity</p>	<p>Human Resources</p>	<p>Estimated budget: €1,500</p>	<p>- Specific training in this area; - Number of male and female Employees participating in the training</p>	<p>To be carried out in Q1 2025. Ensure that 90 % of Semapa's male and female Employees attend this action.</p>	

2.1.4. Parenthood Protection

Objectives	Measures	Managers	Budget	Indicators	Targets	Remarks
Guarantee the right to parental leave for male and female Employees	Campaign to promote the role of fathers during the period of parental leave	Human Resources	Cost: € 1,500	No. of fathers and mothers who used up the entire parental benefit period	Run the campaign around Father's Day 2025	

2.1.5. Equal Working Conditions

Objectives	Measures	Managers	Budget	Indicators	Targets	Remarks
Ensure diversity on grounds of sex in all company functions	Keeping track of Semapa's current situation, which is positive, through regular indicators, to ensure there is no backtracking.	Board / Human Resources	No specific costs involved	- % of men and women holding management positions (1st and 2nd lines); - % of men and women on Executive Boards; - % of men and women on Governing	Ensure that at least 35 % of women are in all positions at Semapa . Carry out the Internal Satisfaction Survey in the first half of 2025, with specific questions on	

				Bodies and Committees of Semapa	equal opportunities for men and women	
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2.1.6. Work-life Balance

Objectives	Measures	Managers	Budget	Indicators	Targets	Remarks
Balancing family and work-life of male and female Employees	Implement more flexible forms of work (flexible working hours, remote work, reduced working hours, whenever possible) for a better family and work-life balance for male and female Employees	Board / Human Resources	No specific costs involved	% of male and female Employees who choose to work from home	In force since 2020 and will be continued	Maintaining the remote work regime, in line with the nature of the duties
	Analyse opportunities and negotiate protocols, preferably without costs for the company, aiming to support male and female Employees,	Human Resources	No specific costs involved	- Documentary evidence through internal disclosures - Number of protocols negotiated with external entities	Increase the number of existing protocols by 10%, especially in the areas of health, education and sport.	

	their children, and people with equivalent bond.					
	Analysing the feasibility of extend to all Group's companies the benefits (already granted in some companies) for the children of the Group's male and female Employees	Human Resources	Measured according to added benefit (e.g. in 2024, Semapa offered all its male and female Employees' children access to a programming language education platform, with a cost around € 30,000. About 400 children and young people used it.)	Extend to the Group companies the measure that offers fathers and/or mothers the afternoon off on the birthday of their children up to the age of 12 and the Wedding Kit, to celebrate these special moments in the life of male and female Employees	In force at Semapa since 2022, the aim being to implement it in at least 3 subsidiary companies by 2025 (50% of the companies)	.

Implementation of the Equality Plan

The implementation and enforcement of Semapa's Equality Plan, as well as the commitment to deliver all necessary resources, will be the responsibility of the Executive Board and the Human Resources area, which will monitor, with the support of the Culture Working Group, compliance with the measures and targets set and annually review the plan, identifying potential improvements or new measures to be implemented.