

**Gender Equality Plan** 



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### 1. Introduction

The 2025 Equality Plan contemplates promoting gender equality and combating discrimination in various areas, such as the labour market, education and social life. While the specific details may vary depending on the country or organization implementing it, these plans include actions and targets to ensure that men and women have the same opportunities and rights.

The main guidelines of an Equality Plan include:

1. Promotion of Equal Opportunities: Implementation of policies that ensure equal access to jobs, fair wages, and opportunities for promotion.

2. Combating Gender Violence: Development of prevention and support programs for victims of violence, as well as awareness campaigns.

3. Education and Awareness: Initiatives to educate the population about the importance of gender equality and women's rights.

4. Support for work-life balance: Creating policies that facilitate the reconciliation of work and family responsibilities, such as parental leave and flexible hours.

5. Political Participation: Encouraging women's participation in leadership positions and political decision-making.

6. Monitoring and Evaluation: Establishment of mechanisms to monitor the progress of implemented actions and evaluate their effectiveness.

These plans are fundamental to building a more just and equal society, where everyone can have their voices heard and their rights respected.

The most recent elective General Assembly of PHAROL, SGPS S.A. was held on March 22, 2024. At that meeting, a Board of Directors composed of 3 elements, 33% female and 67% male, and a Supervisory Board, also composed of 3 elements, 33% female and 67% male, was elected, thus fulfilling the legally required quotas.

In compliance with the provisions of Article 7.° of Law n.62/2017 and in article 3.° of Normative Order no.° 18/2019, of 21 June, which refers to the obligation to prepare annual plans for equality, PHAROL, SGPS S.A., despite being a listed company characterized by some specificities described below, prepared its 2025 plan in order to disclose its position in its policies and practices in the field of gender equality, equal opportunities, in the implementation of policies that guarantee equal access to employment, fair wages, promotion opportunities and that facilitate the reconciliation of work and family responsibilities.

### 2. About Us

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

PHAROL is, first and foremost and given its history, a company with very special characteristics in the Portuguese business fabric, having to manage and face its small size with the permanent challenges of a listed company. The company's profile has gradually adapted to its unique reality and the pursuit of its objectives, namely, to ensure a permanent reduction and control of costs in the management of the Company, considering different scenarios of diversification of its activity that imply strategic and complex decisions. This is the reality that must be taken into account in the appreciation of this Plan.

Since 2015, the Company has undergone a profound change in its shareholder structure and shareholdings, holding 0.10% of the share capital of the Brazilian company Oi as of June 30, 2024.

As a result of the significant changes that have taken place, a new reality in the corporate context and the specificity of the issues it has been facing so far, the Firm has equipped itself with an extremely simplified structure with a very small staff – five employees in total, in addition to its Governing and Supervisory Bodies, and the Chairman of the Board of Directors is, at the same time, its Managing Director - with specific competences to act and pursue present and future challenges.

Despite the constraints mentioned above, PHAROL, SGPS S.A., in addition to including the permanent internal diagnosis regarding the promotion of equality at work, has also assumed special attention to economic, environmental and social sustainability. Always bearing in mind all this

context, the Company remains attentive to all mechanisms related to equal opportunities between men and women, equal remuneration for identical functions and the alignment between the personal and professional goals of employees.

Commitment has been the key word that, regardless of the small size of the Company, has always guided its attitude, implementing procedures that allow to avoid, identify and resolve situations that compromise, within the scope of the promotion of gender equality, Human and Labor Rights, as well as the protection of the family.

In this context, the concerns and principles underlying this diversity policy have always been present in the successive elections of the Company's management and supervisory bodies, including people of various ages, genders, qualifications and complementary academic and professional experience on the Board of Directors, Supervisory Board and employees.



#### 3. Vision, Mission and Values

As a listed company with a large shareholder dispersion, PHAROL, SGPS S.A. has ensured a permanent practice of good governance rules, with several internal diplomas in force, of which we highlight the Code of Ethics and Conduct, which has incorporated specificities regarding the topics of non-discrimination and sustainability, or the Regulations that govern the activity of the Board of Directors, of the Fiscal Council and also of the Chief Executive Officer, matters that are always published on the *Company's* website.

PHAROL, SGPS S.A. fully complies with the provisions of the current legislation that governs the "Regime of balanced representation between women and men in the management and supervisory bodies of public sector entities and listed companies", as well as the principle set out in II.2.1. of the Corporate Governance Code regarding the "Diversity in the composition and functioning of the company's bodies". The following tables are a clear illustration of the Company's commitment to promoting equality between women and men.

In fact, the company's orientation on the path of equality and plurality is to welcome the diversity recommendations in the management and supervisory bodies of PHAROL, SGPS S.A. and which is already formally embodied today by statutory and regulatory means.

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

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

Any information that may relate to a suspicion or confirmation of an irregular practice made by an employee or any other interested party must be reported here.

The company guarantees the confidentiality of the participations and the author of the same".

Within the scope of its vision, mission, values and social responsibility, PHAROL, SGPS S.A., adopts, and consequently implements, a diversity policy with a view to promoting an adequate plurality of gender and age, as well as complementary academic and professional skills and experience, within the respective management and supervisory bodies and other employees.

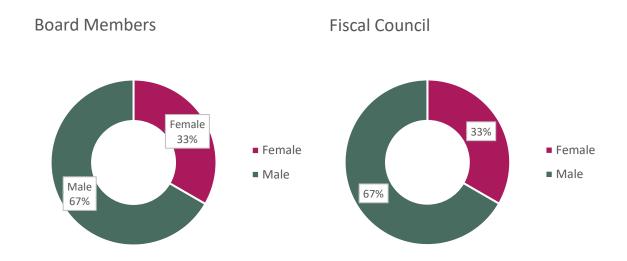
PHAROL, SGPS S.A., maintains a public commitment to gender diversity with all its employees, based on mutual respect and equal opportunities, with strict criteria of meritocracy, transparency, accountability, individual and team recognition and equal treatment, with a constant concern for the protection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

PHAROL, SGPS S.A. has the practice of promoting social dialogue with clarity and accessibility for all employees, fostering the reconciliation between their family life and personal and professional development and ensuring respect for the dignity of all.

For a long time, PHAROL, SGPS S.A. has framed and guaranteed to all its employees an open and transparent culture, where there is no inequality in terms of gender, nationality, ethnicity, origin, social position or age.

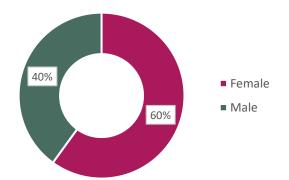


#### **Governing Bodies**



### **Other Employees**

Workers





#### 4. Monitoring and Evaluation of the Plan

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

MEASURES									
DIMENSION: Company strategy, mission and values									
GOAL	MEASURE	DEPARTMENTS/ RESPONSIBLE UNITS/ FOCAL POINT	DEPARTMENTS/ UNITS INVOLVED/ FOCAL POINT	BUDGET	INDICATOR	GOAL			
Publicly assume (internally and externally) the commitment to the promotion of equality between women and men	Inclusion of the commitment to the promotion of equality between women and men in the company's mission and values	General Secretariat	General Secretariat	It does not involve specific costs	Documentary Evidence	2025			