

EQUALITY PLAN FOR 2022

(SEPTEMBER 2021)

1. Framework

Law no. 62/2017, of 1 August, adopting the scheme for 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; it fosters a better performance of the organisation and helps 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 contained 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 for 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 adopted by the Board of Directors in 2002, applicable to subsidiaries where the obligation of non-discrimination is expressed, among others: *"In the company's internal relations and with third parties, Semapa employees must not discriminate or accept discrimination in any way, on the basis of descent, gender, race, language, national origin, religion, political convictions or ideologies, education, economic situation or social status."*

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 sustainability report.

Furthermore, in 2017 Semapa adopted a Code of Good Conduct for Preventing and Fighting Harassment at Work, also applicable to all male and female workers of the entities that comprise the Semapa Group (unless they have a specific Code to this topic), which prohibits harassment at the workplace and sets out the obligations of male and female employees and employers in this regard, as well as the procedure to be followed in the case of harassment.

In addition to a Group vision and the intended alignment between Group 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 which is carried out notwithstanding the obligation of reporting on such matters in consolidated terms in the sustainability report.

1.2. Impact of the Covid 19 pandemic in 2021

The COVID reality we are experiencing since 2020 has impacted the pace of fulfilment set out in the Equality Plan for 2020 and 2021.

Thus, the Equality Plan for 2022 still includes some of the 2021 measures that were not implemented but are still valid and appropriate and represents a step forward in relation to what has been achieved.

1.3. Diagnosis

Before setting up the Equality Plan, Semapa carried out an analysis of the company on gender equality and used the findings to choose the main areas for intervention and define priority measures to be implemented.

The following were the main conclusions:

- a) Semapa has a consistent culture and practice of treating its male and female employees without discrimination of any kind, including gender;

- b) Semapa has implemented the principles of diversity in its core strategic and structural documents;
- c) There are opportunities for improvement, notably (1) in the dissemination of its practices to male and female employees and its partners and (2) in internal training on the subject. The Equality Plan 2022 seeks to emphasise the importance of these matters.

Of the 26 male and female employees at Semapa, considered on an individual basis, 58% are women and 42% are men.

Looking into the functional areas of the company, we see the following break-down:

Functional Areas	Women		Men	
	Number	%	Number	%
Directors	3	43%	4	57%
Managers	1	25%	3	75%
Other	11	73%	4	27%

The figures show that Semapa's workforce is balanced in terms of gender and is developing an internal pipeline to progressively reinforce the 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, highlighting, in which Semapa acknowledges, *"the benefits of diversity in its corporate bodies, particularly the Board of Directors and the Audit Board, for ensuring greater balance in its composition, boosting the performance of each member and, together, of each body, improving the quality of decision-making processes and contributing to its sustainable development."*

Thus, for *"the promotion of diversity in Semapa, the Board of Directors accepts and acknowledges the following Principles of Diversity as appropriate for the composition of the respectively corporate bodies:*

- *Inclusion of members with distinct academic qualifications and professional experience in various areas, suitable and relevant for the post to be held;*
- *Promotion of gender diversity;*
- *Inclusion of members of different ages, combining acquired experiences with new outlooks, and*
- *Inclusion of members from different backgrounds or geographical origins."*

The composition of the Board of Directors and the diversity factors applied to it are as follows:

Diversity factor	Parameter	%
Age	< 50	36.36%
	50-65	36.36%
	>65	27.27%
Gender	Female	27.27%
	Male	72.73%
Education	Econ./Manag.	45.45%
	Engineering	27.27%
	Applied Mathematics	9.09%
	Non graduate	18.18%
Professional background	Professional experience abroad	45.45%
	Different sectors of the group	100%

The Audit Board has 66.67% men and 33.33% women.

2. Equality Plan 2022

2.1. Dimensions of the intervention

2.1.1. Company Strategy, Mission and Values

Objectives	Measures	Managers	Budget	Indicators	Targets	Notes
Acknowledging publicly (internally and externally) the commitment to promoting equality between women and men	Review and internal disclosure of the Ethical Principles: Transition of the reference “non-discrimination” into “ensuring equality”	Human Resources area	No specific costs involved	Documentary evidence	Implementation in 2021	
Ensuring implementation of the Equality Plan, and the control, monitoring and sustainability thereof	Setting up of measurable strategic targets for promoting equal treatment and opportunities between women and men	Management Board / Human Resources area	No specific costs involved	Documentary evidence	Started in 2021 and expected to be completed in 2022	

	Setting up a Working Group for Equality, mandated to diagnose needs felt and submit proposals for change to the Board of Directors / Management for approval in the context of Equal Opportunities for Men and Women	Management Board / Human Resources area	No specific costs involved		Group created in 2020 and operational.	The group should make proposals and ensure the adoption of the measures that are approved
Encouraging male and female employees to take part in the promotion of equality between women and men	Putting the topic Plan for Equality on the agenda of the team meetings, and providing space for all male and female employees to take part in the discussion	Management Board / Human Resources area	No specific costs involved	Annual presentation of the Plan at a Board Meeting	Ongoing since 2021	
Recognising and giving equal visibility of women and men in all	Use neutral, inclusive and non-discriminatory language (verbal and	Management Board / Human Resources area	No specific costs involved	Documentary evidence (documents reviewed)	Ongoing in 2021 and to be completed and	

forms of language, internally and externally	non-verbal) in all documents and internal and external communication processes				continued in 2022	
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2.1.2. Equality in access to employment

Objectives	Measures	Responsibility	Budget	Indicators	Targets	Notes
Overcoming structural barriers to the equality between women and men and fostering greater balance between women and men in the company	Instructing internal managers and external entities in charge of selection and recruitment to guarantee minimum representation of 40% of each gender among the applications during recruitment by the company	Human Resources area	No specific costs involved	Documentary evidence (guidelines)	In force since 2020 and to be continued in 2022	

2.1.3. Initial and Life-long Training

Objectives	Measures	Responsibility	Budget	Indicators	Targets	Notes
Promoting a culture of equality between women and men in the workplace and fostering management and work practices in line with such culture	Promote training on gender equality and diversity	Human Resources area	Estimated budget: €1,500	<ul style="list-style-type: none"> - Training; - Number of male and female employees participating in the training 	To be implemented by 2021 at year-end	Training should cover the following topics in particular: <ul style="list-style-type: none"> - Gender stereotypes; - Inclusive language; - Parental protection; - Balancing family, personal and work-life; - Harassment at work.

2.1.4. Parenthood Protection

Objectives	Measures	Responsibility	Budget	Indicators	Targets	Notes
Guaranteeing the right to parental leave for male and female employees	Encouraging men and women workers to take balanced parental leave, and considering the advisability of granting male and female workers parental support on top of the statutory benefits	Management Board / Human Resources area	No specific costs involved	- Including the topic in the training to be carried out; - Analysing concrete cases of parental leave	To be continued in 2022	

2.1.5. Equal Working Conditions

Objectives	Measures	Responsibility	Budget	Indicators	Targets	Notes
Ensure gender diversity in all corporate functions	Foster balanced participation of women and men in all company	Management Board / Human Resources area	No specific costs involved	- % of men and women holding management	To be implemented in 2022 and in the future	

	functions (especially in top management and middle management positions)			positions (1st and 2nd lines); - % of men and women on Executive Boards; - % of men and women on Governing Bodies		
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2.1.6. Work-life Balance

Objectives	Measures	Responsibility	Budget	Indicators	Targets	Notes
Balancing family and work-life of male and female employees	Implementing more flexible forms of work (flexible working hours, teleworking, reduced working hours, where possible) for balancing better family and work-life	Management Board / Human Resources area	No specific costs involved	% of male and female workers who choose to work from home	Teleworking implemented in 2020 and 2021. Will be continued in 2022	Teleworking was implemented as a consequence of the Covid-19 pandemic, and how to keep it going is under analysis

	of men and women employees					
	Analysing opportunities and negotiating protocols, preferably without costs for the company, aiming to support male and female employees, their children and equivalent persons	Human Resources area	No specific costs involved	Documentary evidence	Ongoing since 2020 and to be reinforced in 2022	
	Analysing the feasibility of implementing in the Group's companies best practices that already exist in some companies concerning benefits for providing support to male and female employees' children.	Human Resources area	No specific costs involved	Number of good practices applied across the board	Working together since 2020 and to be continued in 2022	

2.2. Implementation of the Equality Plan

The implementation and enforcement of Semapa's Equality Plan, as well as the commitment that all the necessary resources are provided, will be the responsibility of the Executive Board and the Human Resources area, which will monitor, with the support of the "Working Group for Equality" that Semapa set up in 2020, compliance with the measures and targets set and annually review the plan, identifying potential improvements or new measures to be implemented.