

Gender Equality Plan

2024-2027

PL.03_V01_GENDER EQUALITY PLAN

| Document history | | | | |
|------------------|------------|----------------------|--------------------------|----------|
| Version | Date | Prepared/modified by | Reasons for modification | Approved |
| 01 | 30/12/2024 | Mafalda Pinto Coelho | Initial version | |

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Framework

Introduction

Gender equality is a fundamental principle for sustainable development and is recognized as an essential right and an indispensable foundation for building fairer and more inclusive societies. For this reason, it occupies a central position on the United Nations' global agenda, reflected in Sustainable Development Goal (SDG) 5 - Gender Equality, which aims to eliminate gender inequalities and ensure the full participation of women and men in all spheres of life, both public and private. In Portugal, this right is also guaranteed by the Constitution of the Portuguese Republic, which, in Article 9(h), gives the state the task of promoting gender equality, consolidating it not only as an ethical principle but as an essential legal obligation.

In recognition of the importance of this issue not only for social development but also as a strategic factor for the success of organizations, Closer Consulting assumes these topics as critical factors for its growth and for the positive impact it aims to generate in society. Therefore, and in line with the Sustainable Development Goals (SDGs), the company is committed to drawing up a plan for gender equality which, through clear targets and effective practices, aims to maintain equal rights, freedoms, and opportunities, contributing to diversity and long-term organizational sustainability.

Closer's commitment to equality

Throughout its existence, Closer has made a solid commitment to social responsibility, promoting diversity, well-being, and equality, as well as fostering an inclusive environment where people are treated with dignity and respect, regardless of gender, age, race, or other personal characteristics.

To this end, the company has implemented work-life balance policies, hybrid work models, and support for employees at different stages of life, seeking to create a space where all people feel valued and empowered to give their best. In addition, it develops social responsibility initiatives aimed at learning, community well-being, and environmental sustainability, while also investing continuously in talent development

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and creating personalized training and structured career plans, to strengthen merit and equal opportunities for all.

The Gender Equality Plan thus reflects the aim of continuing the good practices implemented, analyzing opportunities for improvement, and aligning with the recommendations of the Commission for Equality in Labour and Employment (CITE) and the Horizon Europe program.

This document, therefore, presents a comprehensive diagnosis of gender equality in the organization, defining concrete goals and actions for the 2024-2027 timeframe, with a focus on creating a more inclusive and sustainable environment. The measures presented will focus on the following dimensions:

- Company strategy, mission, and values
- Equal access to employment
- Initial and ongoing training
- Equal working conditions
- Parental protection
- Balancing of professional, family, and personal
- Prevention of harassment at work

Diagnosis

The results presentation of the diagnosis, based on the answers to the questions outlined in the Guide for drawing up Equality Plans and supported by CITE's support matrix, as well as the recommendations of the thematic areas defined under the Horizon Europe project, reflects the distribution and representativeness of women and men in Closer's business universe. This diagnosis brings together concrete data that allows an objective assessment of the company's position in terms of gender equality, identifying the main strengths and areas with potential for improvement. The indicators presented here refer to the company's reality between 2019 and 2024.

To support the plan outlined, the most relevant aspects of this diagnosis are highlighted below, including the measures planned for the coming years.

Strategy, mission, and values

Closer defines its strategy as a direct reflection of its mission to challenge complexity and deliver innovative solutions to the most demanding needs. Guided by a long-term vision, the company is dedicated to creating sustainable value, promoting organizational growth and corporate social responsibility.

Closer's mission is therefore underpinned by its core values, which shape the company's culture and guide all its actions:

o Empathy: we put ourselves in the other person's shoes to better understand their needs and expectations, creating a supportive, more collaborative, and humane environment.

o Professional pride: we value a critical and constructive attitude, combined with perseverance in achieving goals, assertiveness in creating effective solutions, and creativity that drives innovation and overcoming challenges.

o Frugality: we prioritize efficiency, avoiding excesses, waste, and bureaucracy, promoting self-sufficiency, focus, and competitiveness.

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We thus integrate diversity, inclusion, and sustainability into our strategy, promoting an environment of innovation and social impact that simultaneously aims to value the potential of all people.

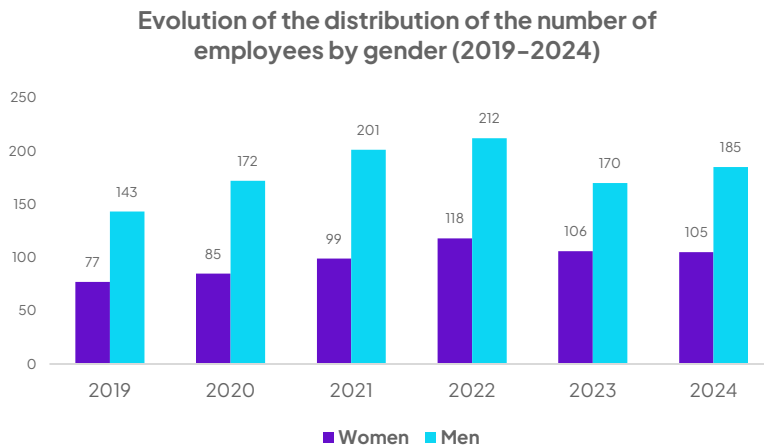


Figure1 : Distribution of the number of employees by gender (2019-2024)

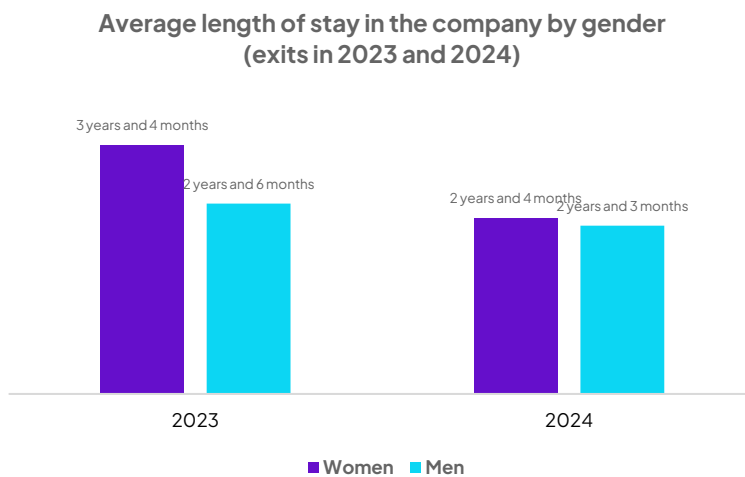


Figure 2: Average length of stay in the company by gender (for employees leaving in 2023 and 2024, respectively)

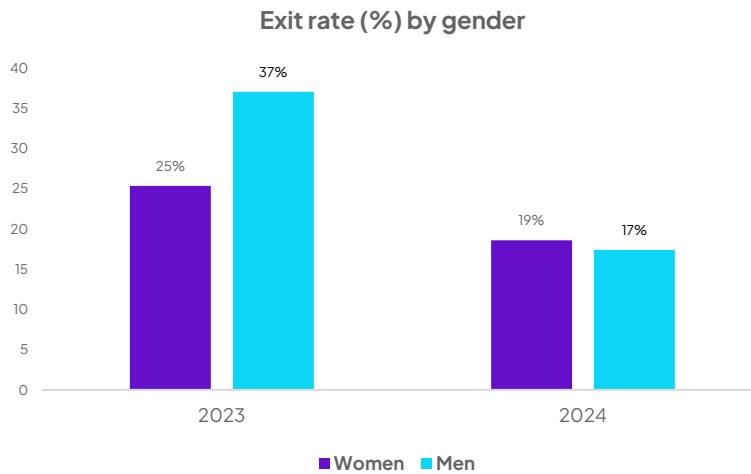


Figure 3: Exit rate (%) by gender (in the years 2023 and 2024)

Equal access to employment

At Closer, everyone is treated equally, regardless of their personal, professional or academic background. As mentioned, the company promotes equal opportunities throughout the life cycle of its employees. The selection and valuation of professionals is based exclusively on merit, relevant qualifications and the skills associated with performing the job, without any discrimination based on individual characteristics. To ensure fairness, Closer adopts objective, transparent and impartial processes in all its recruitment and selection practices.

This commitment is also reflected in our job advertisements, in which we highlight our policy, sharing that Closer is a company that values diversity and inclusion, and seeks to foster an environment where everyone is treated with dignity and respect, regardless of gender, race, beliefs, sexual orientation, physical or mental disability, or other personal characteristics. We believe that the unique perspectives and experiences of each individual are fundamental to the success achieved by the company, and that diversity is indispensable for the composition of plural teams capable of challenging complexity and bringing innovative solutions to market challenges.

By focusing on the diversity of profiles, we seek to identify and attract talents with varied backgrounds, including academic qualifications, professional experiences, and personal trajectories. This prepares our people to face the demands of a dynamic and

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constantly evolving business environment. This focus on multidisciplinary teams aims to strengthen Closer's ability to respond more effectively to day-to-day business challenges.

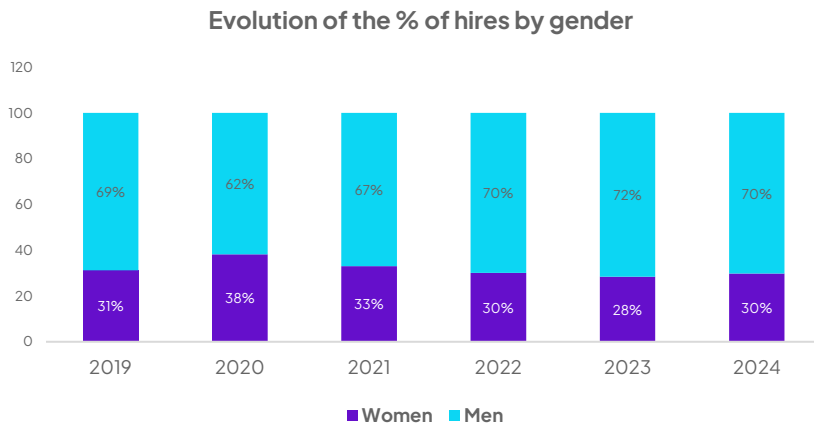


Figure 4: Evolution of the % of hires by gender (2019-2024)

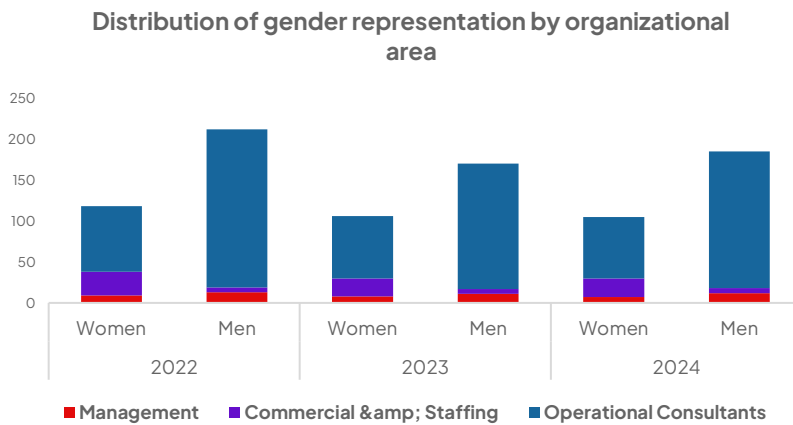


Figure 5: Distribution of gender representation by organizational area

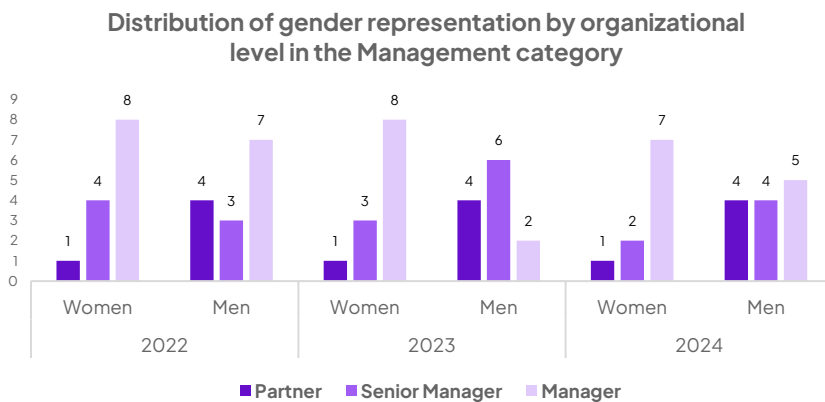


Figure 6: Distribution of gender representation by organizational level in the Management category

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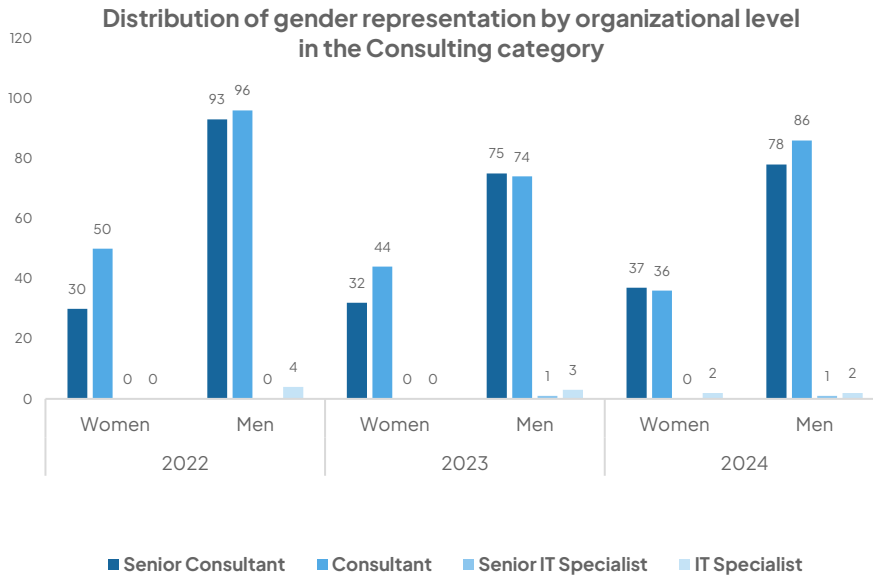


Figure 7: Distribution of gender representation by organizational level in the Consulting category

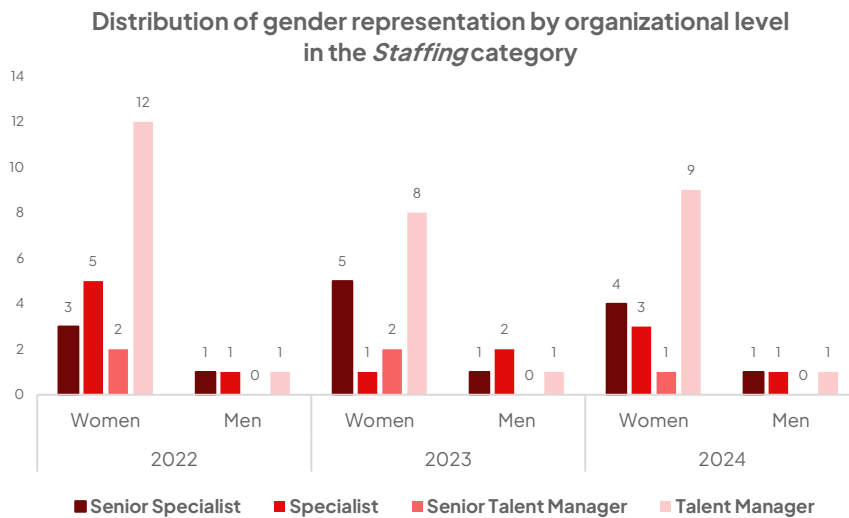


Figure 8: Distribution of gender representation by organizational level in the Staffing category

Initial and ongoing training

At Closer, continuous employee development is an essential pillar of the company's strategy. There is a determination to provide initial and ongoing training through development and training programs aimed at improving technical, interpersonal, and leadership skills, preparing professionals for current and future challenges. These

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programs are personalized, respecting individual needs, and are a reflection of the values we stand for.

By investing in its people's personal and professional growth, Closer creates an environment in which each employee feels committed to contributing to collective success. This aligns internal growth with the excellence of the solutions delivered to clients.

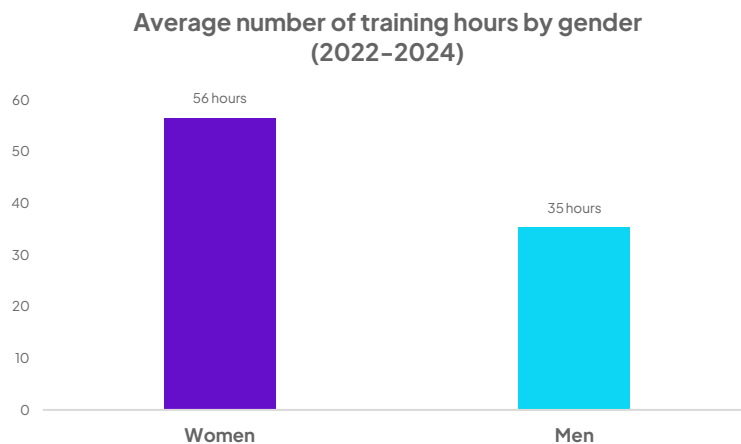


Figure 9: Average number of training hours, by gender, between 2022 and 2024

Equal working conditions

As an organization, Closer promotes fair and equal working conditions, reinforcing that all employees have access to the same resources, benefits, and opportunities, regardless of gender or other personal characteristics.

Although not all working conditions concern salary, on November 14, 2024, we are proud to share that the Commission for Equality in Labor and Employment distinguished Closer for its good practices in promoting Equal Pay for Women and Men for equal work or work of equal value, with the "Equal Pay Seal" 2024, a recognition that testifies to our ongoing work and commitment to gender equality and the elimination of the pay gap between women and men.

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From a more general perspective and encompassing other aspects related to working conditions, the company's remuneration, benefits, and career progression policies are based on clear and objective criteria, in order to prevent any kind of imbalance or discrimination, reinforcing a culture of transparency, justice and fairness.

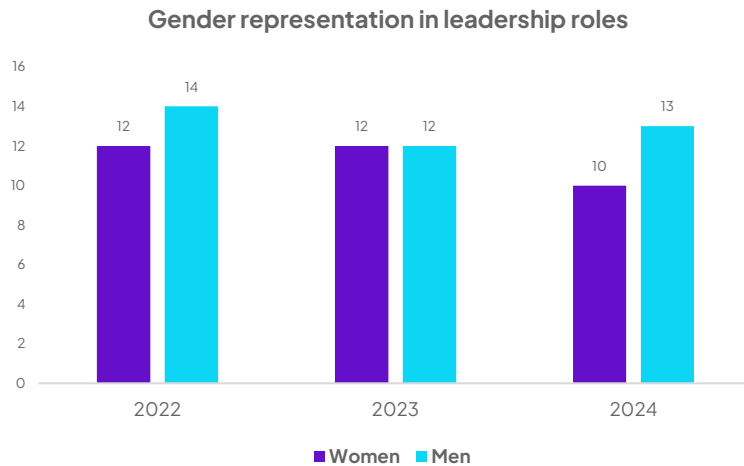


Figure 10: Gender representation in leadership roles

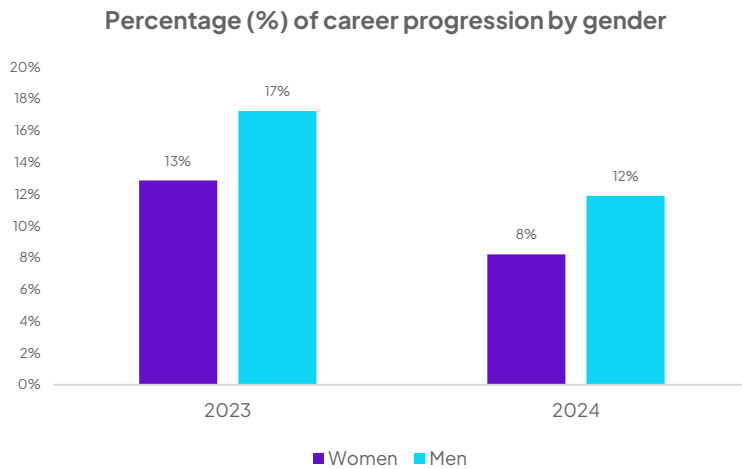


Figure 11: Percentage of career progression by gender (in 2023 and 2024)

Parental protection

The company values parenthood as an integral part of its employees' lives, promoting an environment that balances family and professional responsibilities. Therefore, recognizing the importance of assisting employees at all stages of their lives, Closer adopts parenting protection policies that include balanced leave, flexible return to work, and ongoing support for mothers and fathers.

| Parental Leave 2023 | Women | Men | Total |
|--|-------|------|-------|
| N° of employees entitled to parental leave | 167 | 111 | 278 |
| N° of employees who took parental leave | 11 | 4 | 15 |
| N° of employees who returned to work after completing parental leave | 11 | 4 | 15 |
| N° of employees who returned to work after completing parental leave and remained with the company 12 months after returning | 8 | 3 | 11 |
| Usage Rate (%) | 7% | 4% | - |
| Return Rate (%) | 100% | 100% | - |
| Retention Rate (%) | 73% | 75% | - |

Balancing of professional, family, and personal life

Closer recognizes that reconciling professional, family, and personal roles is essential for the well-being and motivation of its employees. To this end, the company implements hybrid and flexible working models, respecting family responsibilities and individual needs. These policies reflect Closer's ongoing and fundamental commitment to providing an environment that allows for professional fulfillment without compromising quality of life, fostering more satisfied and productive teams.

Prevention of harassment at work

Within the scope of its Code of Conduct, Ethics, and Compliance, and in order to foster freedom of thought and expression, as well as a more transparent and upstanding organizational culture, Closer maintains a zero-tolerance policy towards harassment, guaranteeing a safe and respectful working environment.

As such, the company has implemented a robust whistleblowing system that includes the + Transparente reporting channel for reporting non-compliance, irregularities,

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illegalities, or wrongdoing. This platform ensures that any inappropriate behavior can be reported confidentially and dealt with seriously and diligently. In addition, Closer also has training courses on human rights, social responsibility, and anti-corruption, among others, to raise awareness of these issues, prevent situations and combat any form of harassment, corruption, or discrimination, and reinforce its culture of integrity and respect.

Gender Equality Plan

Strategy, mission, and values

| Objectives | Measures | Responsible Unit | Implementation Status | Indicators |
|--|--|--|-----------------------|--|
| Make a public commitment (internally and externally) to promoting equality between men and women | Incorporating a commitment to promoting equality between women and men into the company's mission and values | Executive Committee (creation) People Development (maintenance) | Implemented | Explicit commitment, respect for diversity, and promotion of equal conditions and opportunities for women and men, in all communications relating to the company's mission and values |
| | Explicit inclusion of the commitment to promoting equality between women and men in strategic documents (e.g. reports, regulations, code of ethics/conduct) as a company value | People Development | Implemented | Explicit manifesto in Closer's Code of Conduct, Ethics & Compliance, showing intolerance of discrimination and differential treatment based on individual characteristics |
| Ensuring the implementation of the Equality Plan, its monitoring, follow-up, and sustainability | Definition, monitoring, and adjustment of objectives for promoting gender equality in various areas (recruitment; training; leadership; etc.) | People Development | Under implementation | Drawing up a formal plan with SMART objectives, targets to be met, and deadlines for implementation |
| | Allocation of resources and funds for the creation of actions and initiatives in the field of gender equality | People Development | To be implemented | No. of ESG actions/initiatives planned, particularly in the area of gender equality, as well as the aggregation of data on the allocation of resources to carry out the activities. Currently, at least 1 initiative is developed per quarter, but still |

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| | | | | without a particular focus on this issue |
| | Annual report to the Executive Board for presentation, reflection, and adjustment of gender equality indicators and results | People Development | To be implemented | Preparation of reports and presentations to the EC. No. of opportunities for improvement identified and adjustments to be made based on the data obtained |
| Disclosing the Equality Plan and its strategic importance for the company and involving everyone in its implementation | Publication of the Equality Plan, its measures and objectives | People Development | To be implemented | Publication on Closer's website, sharing on the intranet, and emailing to all employees |
| Ensuring a working environment free from discrimination based on gender, parenthood, and/or reconciling professional, family, and personal life | Creation and implementation of an internal, formal, and confidential channel for complaints related to discrimination in these areas | Compliance Team + People Development | Implemented | Involving and encouraging employees to use the existing channel for this purpose - Canal + Transparente, in force since 2022 |
| | Integrate issues relating to gender equality, work-life balance, and parental protection into instruments that listen to employee satisfaction and assess the organizational climate | People Development | Under implementation | Diagnosis and consultation. Integrating questions relating to diversity and equality, ethics, and work-life balance into internal satisfaction and organizational climate questionnaires |
| Recognize and integrate the equal visibility of women and men in all forms of language, internally and externally | Adoption of inclusive language (verbal and non-verbal) in all management documents and instruments and the company's communication (e.g. reports, regulations, website, intranet, communications, emails, images) | People Development + Marketing Team | To be implemented | Reviewing and updating the company's management and communication documents and tools with inclusive language |
| Ensure respect for the principle of equality between | Development of a due diligence document to assess the existence of policies in line with the | People Development | Implemented | Document created, implemented and accessible to all |

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| women and men and non-discrimination in external relations | principles of equality and non-discrimination between women and men in relationships established or to be established with stakeholders, entities or partner companies | | | |
| Strengthen public commitment and consolidate external relations in the field of promoting equality between women and men | Establishing partnerships and cooperative relations with stakeholders, public bodies, and civil society organizations that develop initiatives in line with the promotion of gender equality | People Development + Marketing Team | To be implemented | Researching, formalizing, and accounting for strategic partnerships in this area, and publicizing them through Closer's communication channels |
| <u>Ensuring that male and female workers are informed of their rights and duties in the field of equality and non-discrimination</u> | Creation of an internal procedure to ensure the dissemination of information on the rights and duties of male and female workers concerning gender equality and non-discrimination | People Development | Implemented | Evidence of the creation (in 2023) of the procedure, with its dissemination and accessibility to all people |

Equal access to employment

| Objectives | Measures | Responsible Unit | Implementation Status | Indicators |
|--|---|--------------------|-----------------------|--|
| Contribute to a fair and objective recruitment and selection process for women and men | Creation and implementation of an internal procedure to ensure that recruitment and selection criteria take into account the principle of equality and non-discrimination based on gender, and are drawn up by the company in an objective and transparent manner | People Development | Implemented | The existence of a created and implemented procedure, made accessible for consultation |

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| | Clear definition of the requirements and qualifications needed for the job(s) to be filled, including the requirements for the job and the remuneration to be awarded | People Development + Talent Acquisition Team | Implemented | Characteristics of the job(s) to be filled defined (qualifications, job requirements, and remuneration to be awarded) before each R&S process |
| | Specific training for those responsible for recruitment and selection interviews on R&S procedures without gender bias | People Development + Talent Acquisition Team | To be implemented | Acquisition and reinforcement of skills to eliminate unconscious gender-based bias in R&S processes; performance appraisals; succession plans |
| <u>Guarantee the principle of equality and non-discrimination in access to employment</u> | Checking all job advertisements and other forms of advertising linked to pre-selection to ensure that they do not contain, directly or indirectly, any restriction, specification, or preference based on gender | Talent Acquisition Team | Under implementation | Checking and updating the ads created and subsequently published |
| | Checking all job advertisements to ensure that they contain a job title that is common to both sexes and that M/F is displayed | Talent Acquisition Team | Under implementation | Checking and updating the ads created and subsequently published |
| | To publicize and promote the Closer Academy to different audiences, ensuring that communication is made through multiple channels and that the process is inclusive for all, regardless of gender, profile, nationality, academic background, etc. | People Development | Implemented | Scope of dissemination channels (e.g. LinkedIn, Closer Website; Closer Ambassadors; Academic Community) and participants (265 applications in the 1st edition of Data Academy 2024) |

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| <p><u>Guarantee the principle of equality and non-discrimination in access to</u></p> | <p>Creation of a procedure to ensure that, during the trial period, the company respects the period of actual performance of the contract to assess the interest in maintaining it</p> | <p>People Development + Stay Closer</p> | <p>Implemented</p> | <p>Procedure created and implemented internally</p> |
| <p><u>and protecting the safety and health of pregnant workers and workers who have recently given birth or are breastfeeding</u></p> | <p>Creation of a procedure to ensure that the company temporarily replaces pregnant workers, workers who have recently given birth or who are breastfeeding, and who are absent from work while enjoying rights related to parenthood, guaranteeing their return after enjoying these rights</p> | <p>People Development + Stay Closer</p> | <p>Implemented</p> | <p>Procedure created and implemented internally</p> |

Initial and ongoing training

| Objectives | Measures | Responsible Unit | Implementation Status | Indicators |
|---|---|---------------------------|--------------------------|--|
| <p>Promote a culture of equality between women and men in the workplace, encouraging management and working practices that are aligned with this culture.</p> | <p>Ensure that Closer takes into account the principle of equality and non-discrimination between women and men when drawing up the annual training plan</p> | <p>People Development</p> | <p>Implemented</p> | <p>Incorporation of the principle of equality into the training plan. Balanced participation of women and men in the training provided for in the annual plan</p> |
| | <p>Integration of a training module on equality between women and men in the annual plan, covering topics such as gender stereotypes, inclusive language, protection during parenthood, reconciling professional, family,</p> | <p>People Development</p> | <p>To be implemented</p> | <p>Existence of a training module on equality between women and men in the annual training plan for all employees, complemented by activities to promote awareness of this issue, by the end of 2027</p> |

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| | and personal life, moral and sexual harassment at work, and the development of training courses for leaders, aiming to train them to effectively manage diversity in their teams | | | |
| <u>Ensuring equal opportunities for women and men in access to training</u> | Creation and implementation of an internal procedure to ensure that women and men have equal opportunity in the number of hours of certified training established by law | People Development | Implemented | Procedure created and implemented internally |

Equal working conditions

| Objectives | Measures | Responsible Unit | Implementation Status | Indicators |
|--|---|--------------------|-----------------------|--|
| <i>Sub-dimension: Performance Evaluation</i> | | | | |
| Ensure a fair and objective evaluation process for both women and men | Analysis of the current performance appraisal model, and possible revision, to ensure that it excludes any discrimination (direct or indirect) based on gender and that it does not penalize male and female workers for exercising their family responsibilities | People Development | Implemented | The company's performance evaluation model is objective, non-discriminatory, and equally applied to all employees, based on identical skills, and aligned with its SMART Goals, regardless of gender or family responsibilities. |
| <i>Sub-dimension: Promotion/Progression in Professional Career</i> | | | | |
| <u>Promoting equality between women and men in terms of professional progression and development</u> | Creation and implementation of an internal procedure to ensure that when the company appoints a worker to a management position or decision-making | People Development | Implemented | Procedure created and implemented internally |

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| | body, it takes into account the principle of equality and non-discrimination on the grounds of sex | | | |
| <u>Encouraging the balanced participation of women and men in decision-making positions</u> | Organization and provision of mentoring, advisory, and coaching programs to achieve a balanced participation of women and men in top decision-making, management, and leadership positions | People Development | To be implemented | Program created and implemented by the end of 2027 |
| | Organization and provision of support sessions (training, mentoring, coaching, etc.) to facilitate the return of workers who have interrupted their careers for family reasons | People Development | To be implemented | No. of support sessions provided. The ratio of female employees returning to the company after a career break for family reasons who have received support (training, mentoring, and coaching) to the total number of female employees who have taken a career break for family reasons |
| <u>Promoting equality between women and men in career development</u> | Participation in events in the school and training community aimed at promoting students' interest in an area of study that allows access to career opportunities in the IT sector, taking into account the objective of a balanced representation of women and men in this professional area | People Development | Implemented | Between 2023 and 2024, Closer promoted and was actively present at more than 22 events and initiatives of this nature, including strategic partnerships (e.g. Le Wagon), internal programs (e.g. Data Academy), and participation in colleges and employability events. These actions were aimed at attracting and capturing potential talent, particularly in the areas of IT, Data Science, and Business Intelligence, reinforcing Closer's position as a benchmark in these sectors |

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| | | | | The first edition of the Data Academy 2024 received 265 applications, 30% female and 70% male |
| Promoting a balance between women and men in the company's strategic positions | Creation and implementation of an internal procedure to ensure a minimum representation of each gender on the Board | People Development | Implemented | 20% female representation and 80% male representation on the Executive Board |
| <i>Sub-dimension: Wages</i> | | | | |
| Ensure the principle of equal pay for equal work or work of equal value | Creation and implementation of a procedure to ensure that the company, when awarding additional remuneration (e.g. productivity bonuses) and allowances, takes into account the principle of equality and non-discrimination on grounds of gender, and does not penalize women and men for their family responsibilities | People Development | Implemented | Procedure created and implemented |
| | Carrying out an internal analysis and review of the job analysis system, seeking to ensure that it complies with clear, objective, and transparent valuation criteria, to respect the principle of "equal pay for equal work or work of equal value". | People Development | To be implemented | Analysis and diagnosis carried out, identifying areas for improvement and measures adopted to make the necessary adjustments |
| Promote internal transparency on salary policy | Disclosure of the criteria for awarding productivity/ performance bonuses, attendance bonuses, profit sharing bonuses, etc. to male and female employees | DAF People Development | | Dissemination through the Synthetic Actions Manual, available on the intranet and reinforced by e-mail sent to each employee. Clarification, at general company meetings, of the results obtained and the impact |

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| | | | | on the value of the prizes awarded, taking into account the basic criteria |
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Parental protection

| Objectives | Measures | Responsible Unit | Implementation Status | Indicators |
|---|---|-----------------------------------|-----------------------|--|
| <u>Guarantee the right to parental leave for male and female workers</u> | Creation and implementation of an internal procedure to ensure adequate dissemination of all information on legislation relating to parental rights | People Development Stay Closer | Implemented | Internal procedure created and implemented under existing legislation on the subject |
| <u>Ensuring compliance with employment rights related to parenthood, including leave, absence, reduction of working time, protection of the health and safety of pregnant, puerperal, and breastfeeding workers, guaranteeing compliance with the Labor Code.</u> | Creation and implementation of a unified internal procedure to ensure compliance with the legal rules on parental protection, guaranteeing the rights to leave, time off, assistance, and special conditions provided for in the Labor Code | People Development | Implemented | Internal procedure created and implemented |

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Balancing professional, family, and personal life

| Objectives | Measures | Responsible Unit | Implementation Status | Indicators |
|---|--|--------------------|-----------------------|---|
| Promoting the reconciliation of professional, family, and personal life for male and female workers | Provision of a birth basket/kit for employees celebrating the arrival of a child | Stay Closer | Implemented | Newborn welcome basket/kit for all employees |
| | Dissemination of existing resources in the geographical area of the company and/or the workers' residence that facilitates the reconciliation of professional, family, and personal life (e.g. crèches/nanny services, institutions for the elderly) | People Development | To be implemented | Existing resources released by the end of 2027 |
| | Signing protocols with local services (e.g. laundry, catering/takeaway, small repairs), as well as in the health and/or well-being sectors | People Development | Under implementation | 12 protocols or partnerships signed in the categories of Services (MyForce; Family Support Services; Education) and Health and Well-being (Pharmacies; Psychological Support; Gyms; Opticians; Clinical Centers) in the reporting year, offering special conditions to employees and their families |
| | Informal facilitation of working from home when necessary to reconcile work, family, and personal life | People Development | Implemented | The company's employees benefit from the possibility of working remotely, whenever this makes it easier for them to reconcile their personal and family needs. |
| <i>Sub-dimension: Organization of working time - flexible hours or part-time work</i> | | | | |
| | Granting, at the company's initiative, flexible working hours | People Development | Implemented | Closer's employees, both men and women, enjoy the possibility of |

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| <p><u>Ensure that the organization of working time takes into account the need to reconcile the professional, family, and personal lives of male and female workers, particularly those with family responsibilities.</u></p> | <p>to male and female workers to reconcile professional, family and personal life</p> <p>Creation and implementation of an internal procedure to ensure that the company respects the right of workers with family responsibilities to flexible working hours</p> | <p>People Development</p> | <p>Implemented</p> | <p>flexible working hours to promote a better balance between the different spheres of life.</p> <p>Internal procedure created and implemented</p> |
| <p><i>Sub-dimension: Absences</i></p> | | | | |
| <p><u>Ensure that the absence system takes into account the need to reconcile the professional, family, and personal lives of male and female workers, particularly those with family responsibilities</u></p> | <p>Creation and implementation of an internal procedure to ensure that the company respects the right of male and female workers to be absent from work to care for a family member, within the time limits laid down by law.</p> | <p>People Development</p> | <p>Implemented</p> | <p>Internal procedure created and implemented</p> |
| <p><i>Sub-dimension: Teleworking</i></p> | | | | |
| <p><u>Ensure that teleworking arrangements consider the need to reconcile the professional, family, and personal lives of workers, particularly those with family responsibilities.</u></p> | <p>Application, on their initiative, of the teleworking regime to male and female workers, as a way of reconciling professional, family, and personal life</p> | <p>People Development</p> | <p>Implemented</p> | <p>Closer's employees, regardless of gender, are entitled to a hybrid work regime and can telework up to 3x/week, or more, depending on their needs.</p> |
| <p><u>Ensure that teleworking arrangements consider the need to reconcile the professional, family, and personal lives of workers, particularly those with family responsibilities.</u></p> | <p>Creation and implementation of an internal procedure to ensure that the company facilitates the employee's ability to work remotely, when compatible with the activity performed and the company has the</p> | <p>People Development</p> | <p>Implemented</p> | <p>Internal procedure created and implemented</p> |

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| | resources and means to do so, to respect their needs, and to foster a balance between life roles. | | | |
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Prevention of harassment at work

| Objectives | Measures | Responsible Unit | Implementation Status | Indicators |
|---|--|--------------------|-----------------------|--|
| Preventing and combating harassment at work and Preventing and combating the practice of other offenses against the physical or moral integrity, freedom, honor, or dignity of the worker | Carrying out actions to raise awareness of offenses against the physical or moral integrity, freedom, honor, or dignity of male and female workers | People Development | Implemented | Mandatory training for all employees in the <i>onboarding</i> process, covering topics related to Harassment and Anti-Corruption; the Whistleblowing System; Human Rights, and Corporate Social Responsibility. |
| | Communication and dissemination of information to all workers on the procedures to be taken to report acts of offense to physical or moral integrity, freedom, honor, or dignity and moral harassment and/or sexual harassment at work, to be presented on the company's website (www.closer.pt), on the intranet and sent by email | People Development | Implemented | Disclosure of the Code of Ethics, Conduct & <i>Compliance</i> , defining the procedures and guidelines on how to act and report situations of offense to physical or moral integrity, freedom, honor, or dignity, as well as cases of moral harassment and/or sexual harassment, reinforcing the guarantee of confidentiality, protection against retaliation and access to secure and impartial channels (+ Transparente) for communicating and following up on complaints. |
| Ensure the prevention and | Creation and implementation of an internal procedure to | People Development | | Internal procedure created and implemented |

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| <p><u>combating of harassment at work</u></p> | <p>ensure that the company considers the offense of physical or moral integrity, freedom, honor, or dignity, punishable by law, to be just cause for termination of the contract by the employee, including the practice of harassment reported to the department with inspection powers in the labor area, practiced by the employer or his/her representative.</p> | | | |
| | <p>Drawing up and adopting a code of good conduct for preventing and combating harassment at work</p> | <p>People Development</p> | | <p>Code of conduct, ethics, and <i>compliance</i> drawn up, implemented internally, and accessible to all</p> |
| | <p>Creation and implementation of an internal procedure to ensure that, if the company becomes aware of alleged harassment at work, it initiates disciplinary proceedings</p> | <p>People Development</p> | | <p>Internal procedure created and implemented</p> |

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Monitoring

Closer's Gender Equality Plan will be reviewed annually to ensure its continued effectiveness and relevance. The objectives and measures described, as well as the data supporting the diagnosis, will be reviewed and evaluated at the same intervals. This process will allow the actions implemented and to be implemented for the following year to be updated, and whenever necessary, adjustments can be made in intermediate reviews.

The Plan includes objectives and actions for the 2024-2027 timeframe. During the annual review, a diagnosis will be carried out to assess the effectiveness of the measures implemented, detect gaps and define new actions and areas for improvement, depending on the need identified. It should be noted that, in order to ensure a holistic vision, the measures that have already been adopted and are of a permanent nature will also be continued in subsequent years.

The implementation, monitoring and evaluation of the Plan will be carried out by the team responsible in the People Development department, in close collaboration with other relevant areas such as Marketing, *StayCloser* and the Executive Committee. Monitoring will be carried out on the basis of the indicators initially defined in section 2, considering the gender-disaggregated treatment of data relating to the employees' management cycle.

At the same time, Closer is committed to publishing and updating the Plan on the company's official website and sharing it on the internal channels and platforms that exist for this purpose, as well as annually disclosing the results of progress made in relation to the internal gender equality indicators established, as part of the activity report and other relevant reports.

The aim is for this continuous monitoring and adjustment of measures to be not only an internal commitment by the company to its employees but also an operating model in line with Closer's values that inspires sustained change within the organization and fosters strategic partnerships with different *stakeholders*.

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Conclusion

At Closer, equality is a fundamental and guiding principle in the way we operate. We are committed to treating everyone fairly and with respect, ensuring that the same opportunities for growth, development and work-life balance are available to everyone, regardless of their gender or other personal characteristics, as well as their realities and family responsibilities.

This Gender Equality Plan therefore reflects our commitment to eliminating barriers and ensuring a level playing field, with the aim of creating an inclusive and inspiring work environment where all people are valued for their uniqueness and are encouraged to contribute to organizational sustainability.

Let's transform your business?

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