

Gender Equality Protocol

This protocol is intended to outline the steps that must be taken in case of a reported breach of CITAID's Gender Equality Policy.

1. Complaint Reporting

Complaints regarding a breach of the equality policy may be made by the employee directly affected, in writing, or through informal channels, such as a verbal report from the person impacted or an employee who has witnessed the incident. Complaints can also be made anonymously through the provided channel CITAID - Safe Line – Anonymous Channel. The provided link is completely anonymous and no personal information besides the written by the complainant are collected.

All complaints, whether formal or informal, will be treated with the utmost seriousness and confidentiality. Informal reports will be documented and reviewed to determine if they need to be escalated for a formal investigation.

Employees who observe any incidents of discrimination or unfair treatment are encouraged to speak up and report what they have seen. Third-party accounts provide important context and help ensure fairness in the process. All complaints will be handled without retaliation, ensuring a safe and equal workplace for everyone.

2. Resolution Process

2.1. Acknowledgment of the Complaint:

Once a complaint is received, it will be acknowledged by the appropriate department, within 5 days of complaining, to confirm that the matter is being reviewed.

2.2. Initial Review:

The complaint is assessed to understand the situation and determine if further investigation is required. This may involve speaking with the complainant and any witnesses. This initial assessment is typically completed within 10 working days, though the timeframe may be extended if necessary.

All specific details, such as dates, individuals involved, and any supporting evidence (e.g., emails, performance reviews) provided will be carefully and thoroughly examined.

If a breach of policy is confirmed, the process will proceed to the next step. If a breach is not verified the procedure is finalized at this stage with the complainant receiving a report detailing the reasons of conclusion.

2.3. Investigation:

If the issue is deemed serious enough, a formal investigation is initiated by the Chief Gender Equality Officer (CGEO) or, in cases where the CGEO or someone in their reporting line is the accused, by an independent appointed investigator. This may include interviews with the complainant, the accused, and any relevant witnesses, as well as a review of any available evidence.

The process is conducted under confidentiality and expeditiously without forfeiting precision and maintaining thoroughness.

3. Resolution Options:

Based on the investigation's findings, potential resolutions may include mediation, training, policy changes, or disciplinary actions. The focus is on finding a fair and effective solution.

3.1. Findings

After the investigation, the findings are compiled into a report.

If the findings show that the policy was indeed breached, a corrective action will be taken.

If no breach is found the complainant is informed of the outcome.

3.2. Corrective Action is decided based on the findings:

If a violation is confirmed, the company may take the following actions:

- I. **Training & Awareness:** The company may implement further mandatory training on gender equality, unconscious bias, and diversity for all managers and employees.
- II. **Policy Update:** The company may review and update its gender equality policy to ensure more transparency and fairness.

- III. **Disciplinary Action:** If an individual is found to be responsible for the breach, appropriate disciplinary action may be taken. Such actions may include, but are not limited to formal written warnings, temporary suspension from duties, reassignment or restriction of responsibilities, and termination of employment in cases of serious or repeated violations. Where the breach constitutes misconduct under applicable labour legislation or other relevant laws, the company may also initiate the corresponding legal procedures.

4. Follow-Up:

The outcome of the investigation is communicated to both the complainant and the accused party, ensuring confidentiality and professionalism.

The company may also issue a general communication (maintaining complete anonymity) to all staff, reminding them of the organization's commitment to gender equality, without disclosing specific details.

A follow-up is scheduled to ensure that corrective actions are properly implemented.

5. Monitoring and Evaluation

The CGEO monitors the workplace for ongoing compliance with the gender equality policy, ensuring that no further discrimination or bias occurs.

The effectiveness of any corrective actions taken is evaluated after a set period determined by the gravity of the infraction.

6. Documentation:

The full process, including the initial complaint, interview notes, collected evidence, investigation reports, decisions taken, and any corrective or disciplinary measures implemented, will be formally documented according to GDPR concerns. All documentation will be maintained in a secure and confidential manner, accessible only to the CGEO or Legal representatives with a legitimate need to know. Records will be retained for a minimum of five years following the case closure, or five years after the departure of the last employee involved in the complaint, whichever period extends longer, in line with the company's internal

document-retention protocols. These records may be used to demonstrate compliance with the policy, support future risk assessments, or, if necessary, be submitted in legal or administrative proceedings.

7. Contact:

For any questions, clarifications, concerns, or issues related to this protocol or Braining's Gender Equality Policy, employees may contact the Chief Gender Equality Officer (CGEO) through our website <https://www.brainingai.com/equality> (with our anonymous form) or via email joanasantos@brainingai.com. Requests for support or guidance will be handled with discretion and confidentiality, in line with internal procedures and applicable data-protection requirements.



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