

Gender Equality Plan

Organisation: Naplatec S.L., Spain

Version: 1.0 Doc Code: PL001

Effective period: 1 October 2025 – 30 September 2026 (reviewed annually)

Approved by: G S Bazill, CEO

Diversity and Inclusion

Naplatec is committed to the respect of human rights and to equal opportunities for all. We believe in the value that diversity, inclusion, and equality bring to our organization. Guided by these principles, we are determined to continue strengthening our commitment to achieving genuine integration in a work environment where every individual is treated equally and with respect, regardless of nationality, ethnic origin, skin color, marital status, family responsibilities, religion, age, disability, social status, political opinion, gender, sex, sexual orientation, or gender expression.

1) Purpose & Scope of Gender Equality Plan

Naplatec is a **micro-enterprise**. This Gender Equality Plan aligns with with Spanish and EU equality law. It applies to the current employee(s), the Board/owner(s), consultants, trainees, candidates, and visitors, including remote work.

To ensure the effectiveness and compliance of the Gender Equality Plan with Spanish and EU equity law and policy, it will be: (i) Public GEP; (ii) Dedicated resources; (iii) Gender-disaggregated data collection & monitoring (scaled to micro context); (iv) Training/capacity-building; plus recommended areas (work-life balance, leadership, recruitment/progression, gender in R&I, anti-harassment).

While formal Equality Plans are required by Spanish law from 50+ employees, Naplatec voluntarily adopts this micro-GEP to embed good practice from the outset.

2) Governance & Resources (Right-Sized)

- **Accountability:** CEO acts as **Equality Officer (GEP Lead)** until headcount ≥ 5 .
- **External support:** An **independent external adviser** will serve as a **second assessor** for recruitment/complaints to avoid single-person decisions.
- **Resources:** ~ 0.05 FTE (2 h/week average) and an **annual budget €500–1,500** for training, templates, and advisory time.
- **Publication:** GEP and annual progress note published on the company website and internal noticeboard/drive.

Escalation rule (scaling): On reaching ≥ 5 employees, Naplatec will constitute a small **GEP Working Group (GWG)** and review targets/roles.

3) Data, Monitoring & Reporting

- **HR mini-dashboard (quarterly):** applicants→shortlist→offer (gender-disaggregated), contract type, training completion, leaves taken, and exit data (if any).
 - **Privacy:** With very small number of persons, some figures may be **redacted or reported as ranges** to protect confidentiality.
 - **Pay equity:** With only 1 employee, this is **not applicable**; a **pay bands framework** will be prepared for future hires and reviewed annually.
 - **R&I dashboard:** For each project, record whether **sex/gender analysis (SGA)** is considered; justify if N/A; track sex-disaggregated data where relevant.
 - **Annual report:** A **Progress Note** published each Q3 with simple KPIs and next-year actions.
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4) Training & Capacity-Building

- **Mandatory (annual):** 1) **Anti-harassment & bystander** training; 2) **Unconscious bias** in hiring/evaluation.

- **R&I content: Sex/Gender Analysis in research** micro-course (2–3 h) and a short **SAGER-type** reporting checklist.
 - **Onboarding:** For any new hire, mandatory training within **8 weeks**.
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5) Priority Areas, Objectives, Actions, KPIs (Proportionate)

A. Work–Life Balance & Culture

Objective A1: Embed flexible, family-friendly practices from day one. - **Actions:**

A1.1 Publish **flexible hours & hybrid** policy; adopt **core hours 10:00–16:00** for meetings.

A1.2 Quarterly **pulse check** (2–3 questions) covering workload, well-being, inclusion.

- **KPIs (annual):** Policies published; ≥1 pulse check/quarter completed; ≥80% favourable responses (or narrative reflection if N=1).

B. Leadership & Decision-Making

Objective B1: Avoid single-person bias in key decisions until diversity grows. - **Actions:**

B1.1 Use an **external second assessor** for (i) hiring decisions, (ii) grievance/harassment cases, and (iii) annual GEP review.

B1.2 When forming any committee (≥3 people in future), aim for **no single-gender composition** (min. 40% under-represented gender).

- **KPIs:** External assessor named & contracted; evidence of their involvement where applicable.

C. Recruitment, Selection & Career Progression

Objective C1: Ensure fair, bias-aware hiring and progression. - **Actions:**

C1.1 **Inclusive job adverts** (gender-neutral wording) and broad outreach.

C1.2 **Structured rubric** with scores; keep a short **hiring record** for audit.

C1.3 **Balanced shortlist** (at least one candidate of the under-represented gender) **where the talent pool allows**; if not feasible, document efforts.

C1.4 At least **one external interviewer/assessor** in selection.

- **KPIs:** 100% adverts compliant; external assessor used; documentation complete; balanced shortlist attempted and recorded.

D. Gender Dimension in R&I Content

Objective D1: Systematically consider SGA in all research where relevant. - **Actions:**

D1.1 Apply a **1-page SGA checklist** to every project proposal and protocol; **justify N/A** when not relevant.

D1.2 Capture **sex-disaggregated data** in studies where biologically appropriate.

D1.3 Align publications with **SAGER** recommendations.

- **KPIs:** 100% projects screened; % with sex-disaggregated data reported when relevant; SAGER statement in manuscripts.

E. Prevention of Harassment, GBV & Discrimination

Objective E1: Provide a safe, respectful workplace with trusted reporting paths. - **Actions:**

E1.1 Publish a **zero-tolerance Anti-Harassment Policy** (definitions, examples, sanctions).

E1.2 Set up **two reporting channels:** (i) CEO (Equality Officer), and (ii) an **independent external contact** for confidential/anonymous reporting.

E1.3 **Response SLA:** acknowledge within **5 working days**; initial assessment within **15 working days**.

- **KPIs:** Policy published; channels live & tested; SLA met for any reports.

6) Policies & Instruments (Micro Set)

1. **Flexible Work & Parental Leave Policy** (gender-neutral).
2. **Recruitment Pack:** inclusive advert template, scoring rubric, selection record form.
3. **Equal Pay Framework:** banding template for future roles.
4. **Anti-Harassment & Bullying Policy** with external contact details.
5. **Gender in R&I (Sex/Gender sA) Checklist** + SAGER quick guide.

7) One-Year Action Plan & Timeline (Oct 2025 – Sep 2026)

No.	Action	Owner	KPI (target)	Due	Budget
P1	Publish GEP (website + internal)	CEO	Public link live; staff notified	Oct 2025	€0–100
P2	Identify & onboard external assessor	CEO	Contract/ MoU signed	Oct–Nov 2025	€200–600
T1	Complete mandatory trainings (bias, anti-harassment, SGA)	CEO/ Employee	100% completion	Nov 2025	€200–500

No.	Action	Owner	KPI (target)	Due	Budget
R1	Prepare Recruitment Pack & test with a mock review	CEO + assessor	Pack complete; log template ready	Nov 2025	€0–100
S1	Launch SGA checklist ; apply to all active proposals/protocols	CEO/PI	100% screened	From Nov 2025	€0
H1	Activate reporting channels & test SLA	CEO + assessor	Channels tested; SLA met	Dec 2025	€0–100
M1	Quarterly mini-dashboard (HR + R&I)	CEO	Q4, Q1, Q2, Q3 notes filed	Quarterly	€0
R2	Annual Progress Note & next-year plan	CEO + assessor	Note online; plan approved	Sep 2026	€0

8) Roles & Responsibilities

- **CEO / Equality Officer:** Owns GEP; ensures publication, training, SGA, and reporting channels; keeps records and dashboards.
- **External Assessor:** Independent second reviewer for recruitment and for any grievance/harassment reports; co-reviews annual GEP note.
- **All personnel/consultants:** Follow Code of Conduct; complete assigned training; use inclusive practices.

9) Transparency, Confidentiality & Ethics

- **GDPR-compliant processing** of personal data with minimisation and retention limits.
 - **Privacy in small N:** Some statistics may be **withheld/aggregated** to protect identities.
 - **Fair process & anti-retaliation** embedded in all complaint handling.
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10) Review & Scaling Triggers

- **Quarterly micro-review** (15–30 min) and an **annual external light review** with the assessor.
 - **Scale-up triggers:** At **≥5 employees**, constitute a Gender Wage Gap; at **≥10 employees**, review leadership balance targets and expand KPIs; at **≥20**, consider formal negotiation/registration steps as applicable under Spanish law.
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Annex — Micro Templates (to be published with the GEP)

- **A. SGA Checklist (1 page):** relevance, sex-balanced sampling/analysis, endpoints, reporting.
- **B. Inclusive Job Advert Template** with neutral wording and outreach list.
- **C. Selection Rubric & Interview Record** (scores, notes, decision rationale).
- **D. Anti-Harassment Policy (Short Form)** with CEO + external contact and SLA.
- **E. Equal Pay Framework** (bands, criteria) to activate upon next hire.

Signed

CEO / Equality Officer: _____



Date:

____1st October 2025____