



# GENDER EQUALITY PLAN

## GENDER EQUALITY PLAN

## INCOMA

## VERSION 2026–2030

## INDEX

|                                                                              |    |
|------------------------------------------------------------------------------|----|
| <b>1. PRELIMINARY CONTENT</b>                                                | 4  |
| A) Nature                                                                    | 4  |
| B) Commitment to Gender Equality                                             | 5  |
| C) Definitions                                                               | 5  |
| D) Territorial and Personal Scope                                            | 7  |
| E) Period of Application                                                     | 8  |
| F) Minimum Process-Related Requirements of the GEP                           | 9  |
| <b>1. PUBLICATION</b>                                                        | 9  |
| <b>2. DEDICATED RESOURCES</b>                                                | 10 |
| <b>3. DATA COLLECTION AND MONITORING</b>                                     | 11 |
| <b>4. TRAINING AND AWARENESS RAISING</b>                                     | 12 |
| <b>2. DIAGNOSIS</b>                                                          | 13 |
| A) Diagnostic Phase                                                          | 13 |
| B) Summary of the Diagnosis                                                  | 14 |
| <b>STRENGTHS</b>                                                             | 14 |
| <b>AREAS FOR IMPROVEMENT</b>                                                 | 16 |
| <b>OPPORTUNITIES</b>                                                         | 16 |
| <b>THREATS / RISKS</b>                                                       | 17 |
| C) Remuneration and Equal Pay                                                | 17 |
| D) Gender-Disaggregated Data Baseline                                        | 18 |
| <b>3. OBJECTIVES OF THE GENDER EQUALITY PLAN</b>                             | 19 |
| <b>4. SPECIFIC OBJECTIVES</b>                                                | 20 |
| A) Areas of Action and Action Plan                                           | 20 |
| Area 1. Equal opportunities in recruitment, selection and career progression | 20 |
| Area 2. Work-life balance and an inclusive organisational culture            | 21 |
| Area 3. Gender balance in leadership and decision-making                     | 22 |

|                                                                                                   |                                      |
|---------------------------------------------------------------------------------------------------|--------------------------------------|
| Area 4. Integration of the gender dimension into research, innovation, training and projects..... | 22                                   |
| Area 5. Prevention of gender-based violence, sexual harassment and harassment based on sex .....  | 23                                   |
| Area 6. Equal pay and gender-balanced employment conditions .....                                 | 24                                   |
| Area 7. Inclusive communication and external impact .....                                         | 25                                   |
| Area 8. GEP governance, resources, monitoring and training.....                                   | 26                                   |
| <b>5. MONITORING AND RESOLUTION OF DISCREPANCIES .....</b>                                        | <b>26</b>                            |
| <b>A) RESPONSIBILITY FOR IMPLEMENTATION .....</b>                                                 | <b>27</b>                            |
| <b>B) ANNUAL MONITORING .....</b>                                                                 | <b>27</b>                            |
| <b>C) REVISION OF THE PLAN .....</b>                                                              | <b>29</b>                            |
| <b>D) RESOLUTION OF DISCREPANCIES .....</b>                                                       | <b>29</b>                            |
| <b>FORMAL APPROVAL AND PUBLICATION .....</b>                                                      | <b>30</b>                            |
| <b>DOCUMENT CONTROL .....</b>                                                                     | <b>¡Error! Marcador no definido.</b> |

# 1. PRELIMINARY CONTENT

## A) Nature

The present Gender Equality Plan establishes INCOMA's institutional framework for promoting effective equality between women and men and preventing discrimination on the grounds of sex or gender.

The Plan has been developed taking into consideration **Organic Law 3/2007, of 22 March, for the effective equality of women and men**, and **Royal Decree 901/2020, of 13 October, regulating equality plans and their registration**, together with the other applicable provisions on equality, non-discrimination, employment conditions, equal pay and the prevention of sexual and gender-based harassment.

Under Article 45 of Organic Law 3/2007, companies are required to respect equal treatment and equal opportunities in employment and to adopt measures aimed at preventing discrimination between women and men. Companies with fifty or more employees are required to draw up and implement an equality plan. Equality plans may also be required where this is established by the applicable collective agreement or by the labour authority in the circumstances established by law. For other companies, the adoption of an equality plan may be voluntary, subject to the applicable consultation and negotiation requirements.

Regardless of the specific legal basis applicable to INCOMA at any given time, INCOMA adopts this Gender Equality Plan as a formal institutional commitment to equality and as an instrument for establishing measurable objectives, actions, responsibilities, resources, monitoring mechanisms and continuous improvement.

The Plan also incorporates the minimum process-related requirements applicable to INCOMA's Gender Equality Plan: **formal publication and signature by top management; commitment of dedicated human resources and gender expertise; collection and monitoring of sex/gender-disaggregated data and annual indicator-based reporting; and awareness raising and training on gender equality and unconscious gender biases for staff and decision-makers.**

## B) Commitment to Gender Equality

For INCOMA, this Gender Equality Plan represents a formal institutional commitment to the effective equality of women and men and to the prevention of discrimination.

This commitment is consistent with the principles established by **Organic Law 3/2007, of 22 March**, according to which companies must respect equal treatment and equal opportunities in the workplace and adopt measures aimed at avoiding discrimination between women and men.

For INCOMA, however, gender equality extends beyond compliance with employment legislation. It is closely connected with the organisation's activities in research, education, training, social innovation, inclusion and equal opportunities.

INCOMA therefore undertakes to integrate gender equality into its internal employment practices, organisational culture, decision-making processes, research and innovation activities, training provision, European and international projects and institutional communication.

To ensure that this commitment results in effective implementation, INCOMA shall provide the necessary **human resources, staff time and gender expertise**, establish mechanisms for **sex/gender-disaggregated data collection and annual monitoring**, provide **gender equality and unconscious gender bias training to staff and decision-makers**, and ensure that the Gender Equality Plan shall be signed by INCOMA's top management and published on INCOMA's institutional website.

## C) Definitions

The present Gender Equality Plan adopts as its principal reference the concepts and definitions established in **Title I of Organic Law 3/2007, of 22 March, for the effective equality of women and men**, together with the broader principles of equal treatment, non-discrimination and intersectionality established by **Law 15/2022, of 12 July, on comprehensive equal treatment and non-discrimination**.

For the purposes of this Plan, these principles shall guide the interpretation of equality of treatment, equality of opportunities, direct and indirect discrimination, sexual harassment, harassment based on sex, discrimination related to pregnancy or maternity, protection against retaliation and other forms of unequal treatment.

The definitions included below shall be interpreted in accordance with the legislation in force throughout the validity period of the Plan.

For the purposes of this Plan, INCOMA adopts the following concepts.

### **EQUAL TREATMENT BETWEEN WOMEN AND MEN**

Equal treatment means the absence of any direct or indirect discrimination based on sex or gender, particularly discrimination associated with pregnancy, maternity, paternity, family responsibilities or care responsibilities.

### **EQUAL TREATMENT AND EQUAL OPPORTUNITIES IN EMPLOYMENT, TRAINING, CAREER PROGRESSION AND WORKING CONDITIONS**

The principle of equal treatment and equal opportunities shall apply throughout the employment relationship, including recruitment, selection, access to training, professional development, allocation of responsibilities, promotion, remuneration and other working conditions.

Professional decisions shall be based on objective and transparent criteria related to competence, qualifications, experience and the requirements of the position.

### **DIRECT AND INDIRECT DISCRIMINATION**

**Direct discrimination** occurs where a person is treated, has been treated or could be treated less favourably than another person in a comparable situation because of their sex or gender.

**Indirect discrimination** occurs where an apparently neutral provision, criterion or practice places persons of one sex or gender at a particular disadvantage compared with others, unless it can be objectively justified by a legitimate aim and the means of achieving that aim are appropriate and necessary.

### **SEXUAL HARASSMENT**

Sexual harassment means unwanted verbal, non-verbal or physical conduct of a sexual nature that has the purpose or effect of violating a person's dignity, particularly where an intimidating, hostile, degrading, humiliating or offensive environment is created.

### **HARASSMENT BASED ON SEX**

Harassment based on sex means unwanted conduct related to a person's sex that has the purpose or effect of violating that person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual harassment and harassment based on sex are considered discriminatory behaviours.

### **DISCRIMINATION RELATED TO PREGNANCY OR MATERNITY**

Any unfavourable treatment of a woman related to pregnancy or maternity constitutes direct discrimination based on sex.

No employee shall experience professional disadvantages because of pregnancy, maternity, paternity or the legitimate exercise of family or care-related rights.

### **PROTECTION AGAINST RETALIATION**

No person shall suffer adverse treatment because of making a complaint, raising concern, participating in an investigation or taking action intended to prevent discrimination or protect the principle of equality.

### **UNCONSCIOUS GENDER BIAS**

Unconscious gender biases are assumptions, attitudes or stereotypes concerning women, men or gender roles that may influence perceptions and decisions without conscious intention.

Such biases may affect recruitment, task allocation, professional evaluation, promotion, leadership, communication, research or other organisational decisions.

### **GENDER DIMENSION**

Integrating the gender dimension means considering, where relevant, whether sex and/or gender affect people's needs, experiences, participation, opportunities, behaviours or outcomes.

In research and innovation, this goes beyond simply recording the number of women and men and may involve analysing whether the subject matter, methodology, results or impacts present relevant sex- or gender-related differences.

## **D) Territorial and Personal Scope**

This Gender Equality Plan applies to all activities undertaken by INCOMA, regardless of the geographical location in which they are implemented.

The Plan applies to all current and future INCOMA personnel during its period of validity, regardless of:

- professional position;
- department or functional area;
- contractual relationship;
- seniority;

- working hours;
- on-site, hybrid or remote working arrangements; or
- involvement in specific national or international projects.

Its principles shall also guide INCOMA's interactions, where relevant, with:

- trainees and interns;
- external experts;
- trainers and researchers;
- project participants and beneficiaries;
- learners;
- partner organisations;
- subcontractors; and
- other stakeholders participating in INCOMA activities.

INCOMA is not a higher education establishment with a permanent population of enrolled students. Consequently, the institutional GEP monitoring baseline will focus primarily on personnel.

Nevertheless, where INCOMA implements training, research or project activities involving learners, trainees, students or other participants, sex/gender-disaggregated participation data will be collected where relevant, proportionate and compatible with applicable data-protection requirements.

INCOMA, at the date of adoption of the Plan, women represent 23 of INCOMA's 28 employees (82.1%), while men represent 5 (17.9%). The organisation therefore presents a marked overall female majority.

Annual monitoring will examine whether this distribution is also reflected across professional categories, management, project leadership and decision-making positions.

## **E) Period of Application**

In accordance with Article 9 of Royal Decree 901/2020, of 13 October, the period of validity of an equality plan may not exceed four years.

Accordingly, the present INCOMA Gender Equality Plan shall have a validity period of four years from the date of its formal approval and signature by top management.

Where formally approved in 2026, it shall therefore constitute the INCOMA Gender Equality Plan 2026–2030, with the precise starting and expiry dates recorded following signature.

This is without prejudice to the monitoring, evaluation and revision procedures established in this Plan. The Plan may be reviewed before its expiry where monitoring results, significant changes in the workforce or organisation, changes to remuneration systems, changes in the legal framework or other circumstances make revision necessary. Royal Decree 901/2020 expressly provides for revision of equality plans in several such circumstances.

## F) Minimum Process-Related Requirements of the GEP

INCOMA establishes four minimum process-related requirements as mandatory building blocks of this Gender Equality Plan.

### 1. PUBLICATION

The Gender Equality Plan shall constitute a **formal institutional document**.

It shall:

- be formally approved by INCOMA;
- be signed and/or formally adopted by INCOMA's top management;
- be published on INCOMA's institutional website;
- be communicated internally to staff; and
- remain publicly accessible during its period of validity.

Any substantial revision of the Plan shall also be formally approved and appropriately communicated.

#### **Evidence of compliance:**

- formally approved GEP;
- signature or formal adoption by top management;
- publication on INCOMA's website;
- internal communication to personnel.

## 2. DEDICATED RESOURCES

INCOMA commits appropriate **human resources, working time and gender expertise** to the implementation of the Gender Equality Plan.

A person shall be formally designated as **GEP Coordinator / Gender Equality Responsible Person**.

INCOMA shall also establish a **Gender Equality Working Group**, appropriate to the size and structure of the organisation, to support implementation and monitoring.

Where possible, the Working Group will draw upon personnel with experience in:

- gender equality;
- social inclusion;
- research;
- project management;
- training;
- human resources or personnel management; and
- organisational communication.

Where the required expertise is not available internally, external gender expertise may be engaged.

Resources may include:

- dedicated staff working time;
- monitoring and data-management resources;
- training resources;
- gender expertise;
- communication resources; and
- external specialised support where necessary.

Resource needs shall be reviewed annually.

### **Evidence of compliance:**

- appointment of a GEP Coordinator;
- existence of a Gender Equality Working Group;
- documented staff time and organisational resources;

- access to gender expertise;
- records of GEP meetings and implementation activities.

### 3. DATA COLLECTION AND MONITORING

INCOMA shall establish and maintain a system for collecting and monitoring **sex/gender-disaggregated data on personnel.**

An institutional gender equality baseline shall be established when this Plan enters into force and updated annually.

Depending on relevance, proportionality, workforce size and data availability, indicators will include:

- total workforce by sex/gender;
- distribution by professional or functional area;
- distribution by level of responsibility;
- management and decision-making positions;
- recruitment;
- new appointments;
- career progression;
- participation in professional training;
- participation in gender equality training;
- contract type;
- working-time arrangements;
- use of work-life balance measures;
- remuneration;
- staff turnover; and
- other indicators considered necessary for monitoring gender equality.

INCOMA shall prepare an **Annual Gender Equality Monitoring Report based on indicators.**

The report will identify:

- progress achieved;

- remaining inequalities;
- implementation status of measures;
- training completed;
- relevant changes in workforce composition;
- areas requiring additional action; and
- priorities for the following year.

Data shall be processed and reported in a manner that protects confidentiality and personal data, particularly where small numbers could permit the identification of individual employees.

**Evidence of compliance:**

- annual sex/gender-disaggregated dataset;
- annual monitoring report;
- indicator results;
- corrective actions adopted where appropriate.

#### **4. TRAINING AND AWARENESS RAISING**

INCOMA shall provide **awareness raising and/or training on gender equality and unconscious gender bias for staff and decision-makers.**

Training shall be adapted to organisational needs and may address:

- gender equality and non-discrimination;
- unconscious gender bias;
- gender stereotypes;
- inclusive recruitment;
- gender equality in decision-making;
- gender-sensitive communication;
- work-life balance;
- prevention of sexual harassment and harassment based on sex;
- intersectionality;
- gender-sensitive research methods; and

- integration of the gender dimension into projects and training activities.

People involved in management, recruitment, professional evaluation, project leadership or other decision-making functions shall be considered a priority target group.

At least **one gender equality awareness-raising or training activity shall be carried out each year.**

Gender equality information will also progressively be incorporated into the onboarding of new staff.

**Evidence of compliance:**

- annual training programme or activity;
- attendance records;
- percentage of staff participating;
- percentage of decision-makers participating;
- training materials;
- participant feedback, where applicable.

## 2. DIAGNOSIS

### A) Diagnostic Phase

The development of the Gender Equality Plan involves establishing INCOMA's institutional gender equality policy and a system for periodically monitoring its implementation.

The diagnostic phase provides the evidence needed to identify strengths, potential inequalities and priority areas for action.

The diagnosis will consider the following areas:

1. Recruitment and selection
2. Professional classification and distribution of responsibilities
3. Training
4. Career progression
5. Working conditions

6. Work-life balance and shared care responsibilities
7. Representation of women and men
8. Leadership and decision-making
9. Remuneration
10. Prevention of sexual harassment and harassment based on sex
11. Organisational culture and communication
12. Integration of gender into research, innovation, training and project activities
13. Gender equality knowledge and unconscious bias awareness
14. GEP governance, resources and institutional accountability

The diagnosis shall combine, where possible:

- quantitative data;
- sex/gender-disaggregated personnel information;
- existing organisational policies and procedures;
- information from recruitment and training;
- staff feedback;
- project experience;
- qualitative organisational information; and
- results from previous GEP monitoring cycles.

Because the source documentation used to prepare this first version does not contain a complete and current sex/gender-disaggregated dataset for INCOMA's entire workforce, the **formal personnel baseline shall be established at the time of GEP adoption.**

This baseline will become the reference point against which annual progress is assessed.

## B) Summary of the Diagnosis

The following initial conclusions are presented using a SWOT approach.

### STRENGTHS

**Organisational commitment to inclusion and equal opportunities**

INCOMA's institutional activities are strongly linked to social inclusion, educational innovation, employability, active citizenship and equal opportunities.

### **Gender-related project experience**

INCOMA has accumulated significant practical experience through European and international projects addressing issues including:

- women's empowerment;
- women's entrepreneurship;
- migrant women;
- gender-sensitive integration;
- gender stereotypes;
- women and digital skills;
- women in STEM-related contexts;
- gender-based inequalities in employment;
- women's participation in agriculture and entrepreneurship;
- women in tourism and hospitality; and
- inclusion of groups experiencing multiple barriers.

This experience provides a strong foundation for institutional gender mainstreaming.

### **Research and training capacity**

As a research and training centre, INCOMA is well placed to integrate gender equality into research methodologies, educational resources, training programmes and project design.

### **International networks and partnerships**

INCOMA works with a broad international network of educational institutions, research centres, VET providers, civil-society organisations, public authorities and other stakeholders, providing opportunities to exchange and disseminate good practices in gender equality.

### **Existing inclusive organisational approach**

INCOMA's broader work already incorporates inclusion, diversity and equal opportunities, providing a favourable organisational environment for implementation of the GEP.

## AREAS FOR IMPROVEMENT

### **Need for a consolidated gender-disaggregated baseline**

A complete and standardised institutional baseline of sex/gender-disaggregated personnel data must be consolidated and updated annually.

### **Formalisation of monitoring**

Gender equality monitoring should move from individual practices or project-specific requirements to a systematic institutional process based on common indicators.

### **Formalisation of dedicated GEP responsibilities**

The GEP requires clearly identified responsibility, dedicated working time and documented coordination arrangements.

### **Systematic unconscious bias training**

Gender equality and unconscious gender bias awareness should be formalised as a recurring institutional training commitment rather than depending solely on individual project participation or expertise.

### **Systematic gender mainstreaming across all relevant projects**

INCOMA has strong experience in gender-related projects, but this expertise should be transferred systematically to other research, innovation and training activities whenever gender is relevant.

## OPPORTUNITIES

### **Consolidation of gender expertise**

INCOMA can transform expertise developed through international projects into internal organisational practice.

### **European research and innovation environment**

European programmes increasingly encourage systematic integration of gender equality and gender analysis into research and innovation.

### **Professional development**

Gender equality training can strengthen the skills of staff involved in research, project management, recruitment, communication and decision-making.

### **Evidence-based organisational improvement**

Annual collection of gender-disaggregated data will make it possible to identify trends early and introduce targeted corrective measures.

### **External impact**

INCOMA can use its projects, partnerships and communication activities to contribute to wider awareness of equality and non-discrimination.

## **THREATS / RISKS**

### **Unconscious bias**

Gender inequalities can arise even in organisations with a strong commitment to inclusion where unconscious stereotypes influence recruitment, responsibility allocation or decision-making.

### **Small workforce effects**

In a relatively small organisation, individual recruitment or departure decisions may produce significant short-term changes in gender balance.

### **Project-related workload**

Periods of intense project implementation may limit the time available for equality-related monitoring and training unless resources are explicitly allocated.

### **Underreporting of inappropriate behaviour**

As in any workplace, fear of negative consequences or uncertainty regarding reporting procedures may discourage the reporting of harassment or discriminatory behaviour.

### **Inconsistent application across projects**

Without common institutional guidance, gender considerations may be strongly integrated into some projects while receiving less attention in others.

## **C) Remuneration and Equal Pay**

INCOMA shall guarantee the principle of **equal remuneration for equal work and work of equal value**, in accordance with Article 28 of the consolidated text of the Workers' Statute, approved by **Royal Legislative Decree 2/2015, of 23 October**, and **Royal Decree 902/2020, of 13 October, on equal pay between women and men**.

Remuneration shall be determined according to objective, transparent and gender-neutral criteria, taking into account the professional functions and responsibilities

performed, the qualifications and professional requirements associated with the position, working conditions and any other objectively justified employment-related factors.

In accordance with the applicable legislation, INCOMA shall maintain a **remuneration register covering its workforce**, including the relevant average remuneration values disaggregated by sex and structured according to the applicable professional classification. Royal Decree 902/2020 establishes this remuneration-register requirement for all companies, regardless of size.

The remuneration register and the gender-disaggregated information derived from it shall contribute to the monitoring of this Gender Equality Plan while respecting applicable rules concerning access, confidentiality and personal-data protection.

Any salary supplements, additional remuneration or other employment-related economic benefits shall be allocated on the basis of objective and transparent criteria and without discrimination on the grounds of sex or gender.

Where monitoring identifies an unexplained difference in remuneration between women and men, INCOMA shall analyse its causes and adopt appropriate corrective measures where necessary.

The provisions of the **collective agreement effectively applicable to INCOMA**, in its current version, shall also be taken into account.

### Indicators

Remuneration register maintained and updated: **Yes/No**.

Remuneration data disaggregated by sex available: **Yes/No**.

Average and median remuneration analysed by sex where meaningful.

Number of unexplained pay differences identified.

Number of corrective measures adopted where necessary.

## D) Gender-Disaggregated Data Baseline

Upon approval of this Plan, INCOMA shall establish a baseline containing the current gender distribution of its workforce.

The baseline shall include, where applicable:

| Indicator       | Women | Men | Total |
|-----------------|-------|-----|-------|
| Total personnel | 23    | 5   | 28    |

|                                   |   |   |   |
|-----------------------------------|---|---|---|
| Management / decision-making      | 0 | 3 | 3 |
| Project coordination / leadership | 4 | 4 | 8 |

The table shall be completed using current personnel records at the date of formal approval rather than historical figures taken from previous project documentation.

It shall be updated annually and incorporated into the Annual Gender Equality Monitoring Report.

### 3. OBJECTIVES OF THE GENDER EQUALITY PLAN

INCOMA shall provide the necessary human resources, gender expertise and organisational means to ensure implementation of the Gender Equality Plan.

The following general objectives are established:

- Promote equal opportunities throughout INCOMA's internal processes.
- Foster an inclusive, respectful and gender-sensitive organisational culture.
- Facilitate work-life balance and shared responsibility for care.
- Promote gender balance in leadership and decision-making.
- Guarantee equality in recruitment, professional development and working conditions.
- Integrate the gender dimension into research, innovation, education, training and project activities whenever relevant.
- Prevent sexual harassment, harassment based on sex and other forms of gender-based violence.
- Ensure equal pay and gender-neutral remuneration practices.
- Promote inclusive and non-sexist communication.
- Strengthen knowledge of gender equality and unconscious gender bias among staff and decision-makers.
- Establish systematic sex/gender-disaggregated data collection and annual monitoring based on indicators.
- Guarantee institutional accountability through formal publication, dedicated resources and periodic evaluation of the GEP.

## 4. SPECIFIC OBJECTIVES

### A) Areas of Action and Action Plan

#### Area 1. Equal opportunities in recruitment, selection and career progression

**Responsible:** Management / Personnel Management / GEP Coordinator

**Priority:** High

**Implementation period:** Continuous; reviewed annually

#### Objective

Guarantee equal treatment and equal opportunities for women and men in recruitment, selection, professional development and access to responsibility.

#### Measures

- Review recruitment and selection procedures from a gender perspective.
- Use inclusive and non-sexist language in vacancy announcements and job descriptions.
- Define objective selection criteria based on competences, qualifications and professional requirements.
- Avoid gender stereotypes concerning professional roles, leadership, availability or care responsibilities.
- Promote awareness of unconscious gender bias among staff participating in recruitment.
- Where feasible, encourage gender-balanced candidate pools, particularly where one gender is underrepresented.
- Monitor recruitment outcomes by sex/gender.
- Ensure equal access to professional training.
- Monitor access to career-development opportunities and leadership responsibilities by gender.
- Ensure that maternity, paternity or care-related leave does not result in unjustified professional disadvantage.
- Review professional progression criteria periodically to ensure transparency and gender neutrality.

#### Indicators

- Percentage of vacancy announcements using inclusive language.
- Number of recruitment procedures reviewed from a gender perspective.
- Gender distribution of applicants, where data are available.
- Gender distribution of people recruited.
- Percentage of staff involved in recruitment receiving unconscious bias awareness.
- Participation in professional training by gender.
- Career progression and allocation of new responsibilities by gender.
- Identified gender imbalances and corrective measures adopted.

## Area 2. Work-life balance and an inclusive organisational culture

**Responsible:** Management / GEP Coordinator

**Priority:** High

**Implementation period:** Continuous; staff needs reviewed annually

### Objective

Promote an organisational culture in which employees can balance professional, personal and family responsibilities without gender disadvantage.

### Measures

- Promote flexible working and work-life balance measures.
- Ensure equal access to such measures for women and men.
- Encourage shared responsibility for family and care duties.
- Promote an inclusive and respectful working environment.
- Periodically consult staff about work-life balance needs.

### Indicators

- Percentage of staff using work-life balance measures, disaggregated by sex/gender.
- Percentage of staff informed about available measures.
- Staff perception of work-life balance.
- Number of staff consultations or surveys carried out.
- Number of improvements introduced.

### Area 3. Gender balance in leadership and decision-making

**Responsible:** Top Management

**Priority:** High

**Implementation period:** Continuous; reviewed annually

#### Objective

Promote balanced participation of women and men in leadership, management and decision-making roles.

#### Measures

- Monitor gender representation in management and decision-making positions.
- Monitor gender distribution among project coordinators and lead roles.
- Encourage balanced representation in committees and working groups.
- Analyse significant gender imbalances where identified.
- Promote equal access to leadership opportunities.

#### Indicators

- Gender distribution in management positions.
- Gender distribution among project coordinators.
- Gender composition of committees and working groups.
- Number of identified imbalances.
- Number of corrective measures adopted.

### Area 4. Integration of the gender dimension into research, innovation, training and projects

**Responsible:** Innovation & Research Department / Project Coordinators / GEP Coordinator

**Priority:** High

**Implementation period:** Throughout the design and implementation of relevant projects; reviewed annually

#### Objective

Ensure that gender considerations are systematically assessed and incorporated into INCOMA's research, innovation, training and project activities whenever relevant.

### Measures

- Consider sex and gender dimensions in project design where relevant.
- Collect sex/gender-disaggregated participant data where appropriate.
- Integrate gender considerations into research methodologies and training materials.
- Use gender-sensitive and inclusive language and imagery.
- Consider intersectional barriers affecting target groups.

### Indicators

- Percentage of relevant projects incorporating gender considerations.
- Number of projects collecting sex/gender-disaggregated data.
- Number of methodologies or training materials reviewed from a gender perspective.
- Number of gender-sensitive project outputs.
- Number of staff trained in gender mainstreaming.

## Area 5. Prevention of gender-based violence, sexual harassment and harassment based on sex

**Responsible:** Top Management / Designated Responsible Person / GEP Coordinator

**Priority:** High

**Implementation period:** Continuous; protocol and awareness reviewed annually

### Objective

Prevent and appropriately address sexual harassment, harassment based on sex and other forms of conduct affecting sexual freedom, dignity and equality in the workplace, including conduct occurring through digital channels.

INCOMA's actions in this area shall take into account Organic Law 3/2007, of 22 March, particularly its provisions concerning the prevention of sexual harassment and harassment based on sex, and Organic Law 10/2022, of 6 September, on the comprehensive guarantee of sexual freedom.

Organic Law 10/2022 requires companies to promote working conditions that prevent conduct against sexual freedom and moral integrity, with particular attention to sexual harassment and harassment based on sex, including conduct occurring in the digital environment, and to establish specific procedures for prevention and for handling complaints or reports.

### Measures

- Establish and maintain a protocol for preventing and responding to sexual harassment and harassment based on sex.
- Inform all staff about the protocol and reporting channels.
- Designate and train responsible personnel.
- Guarantee confidentiality and protection against retaliation.
- Include harassment prevention in awareness and training activities.

### Indicators

- Prevention and response protocol available: Yes/No.
- Percentage of staff informed about the protocol.
- Percentage of staff aware of reporting channels.
- Responsible personnel trained: Yes/No.
- Number of awareness activities carried out.

## Area 6. Equal pay and gender-balanced employment conditions

**Responsible:** Top Management / Personnel Management

**Priority:** High

**Implementation period:** Continuous; remuneration monitoring annually

### Objective

Guarantee gender-neutral employment conditions and equal remuneration for equal work and work of equal value.

### Measures

- Apply objective and transparent remuneration criteria.
- Maintain and update the remuneration register.
- Monitor remuneration by sex/gender.

- Analyse unexplained pay differences.
- Review employment conditions from a gender perspective.

#### **Indicators**

- Remuneration register updated: Yes/No.
- Gender-disaggregated remuneration data available: Yes/No.
- Number of unexplained pay differences identified.
- Number of corrective measures adopted.
- Distribution of contract types and working-time arrangements by gender.

### **Area 7. Inclusive communication and external impact**

**Responsible:** Communication / Innovation & Research / Project Teams

**Priority:** Medium-High

**Implementation period:** Continuous

#### **Objective**

Ensure that INCOMA's communication supports gender equality and avoids sexist, discriminatory or stereotypical representation.

#### **Measures**

- Promote inclusive and non-sexist language.
- Avoid gender stereotypes in visual and written communication.
- Review relevant institutional and project communication materials.
- Encourage balanced representation of women and men as experts and speakers.
- Communicate INCOMA's commitment to gender equality.

#### **Indicators**

- Percentage of relevant communication materials reviewed.
- Number of gender equality communication actions.
- Gender representation among speakers and experts where monitored.
- GEP published on INCOMA's website: Yes/No.
- Number of internal communications about GEP implementation.

## Area 8. GEP governance, resources, monitoring and training

**Responsible:** Top Management / GEP Coordinator / Gender Equality Working Group

**Priority:** High

**Implementation period:** Throughout the validity of the Plan

### Objective

Guarantee the effective institutional implementation of the Gender Equality Plan and continuous compliance with its four minimum process-related requirements.

### Measures

- Formally approve and sign the GEP.
- Publish the GEP on INCOMA's website.
- Appoint a GEP Coordinator.
- Establish a Gender Equality Working Group.
- Allocate human resources, staff time and gender expertise.
- Update sex/gender-disaggregated personnel data annually.
- Prepare an Annual Gender Equality Monitoring Report.
- Provide gender equality and unconscious gender bias training to staff and decision-makers.

### Indicators

- GEP approved and signed: Yes/No.
- GEP published on the institutional website: Yes/No.
- GEP Coordinator appointed: Yes/No.
- Gender Equality Working Group established: Yes/No.
- Annual monitoring report completed: Yes/No.
- Gender-disaggregated dataset updated annually: Yes/No.
- Number of training activities per year.
- Percentage of staff and decision-makers participating.

## 5. MONITORING, EVALUATION AND RESOLUTION OF DISCREPANCIES

Implementation and monitoring of the Gender Equality Plan are essential to ensure that the measures described above result in effective organisational change.

## A) RESPONSIBILITY FOR IMPLEMENTATION

Top Management shall retain ultimate institutional responsibility for the Gender Equality Plan.

A **GEP Coordinator / Gender Equality Responsible Person** shall coordinate day-to-day implementation.

The Coordinator shall be supported by a **Gender Equality Working Group**.

The Working Group should, where organisationally feasible, involve representatives or expertise from relevant functions such as:

- management;
- personnel administration;
- Innovation & Research;
- project management;
- training; and
- communication.

The Working Group shall meet at least **twice per year**, with additional meetings where required.

Its functions shall include:

- monitoring implementation of measures;
- reviewing indicators;
- identifying difficulties;
- supporting annual data collection;
- proposing training and awareness activities;
- identifying corrective actions;
- supporting preparation of the annual report; and
- proposing revisions to the Plan.

## B) ANNUAL MONITORING

The implementation of the Gender Equality Plan shall be monitored periodically throughout its validity period.

This monitoring shall take into account the requirements established by **Organic Law 3/2007** and **Royal Decree 901/2020**, under which equality plans must establish effective systems for monitoring and evaluating their objectives and measures.

In addition, as a specific process-related requirement of the INCOMA GEP, **sex/gender-disaggregated personnel data shall be collected and updated annually, and an Annual Gender Equality Monitoring Report based on indicators shall be produced each year.**

At a minimum, annual monitoring shall consider:

- workforce composition by sex/gender;
- professional categories and functional areas;
- representation in management and decision-making;
- recruitment and selection;
- career progression;
- participation in professional training;
- participation in gender equality and unconscious bias training;
- working-time and work-life balance measures;
- remuneration and the remuneration register;
- implementation of measures concerning sexual harassment and harassment based on sex;
- integration of gender considerations into relevant research, training and project activities;
- progress against the measures and indicators established in this Plan; and
- resources allocated to GEP implementation.

The Annual Gender Equality Monitoring Report shall identify progress achieved, measures completed or pending, inequalities or risks identified and any corrective or additional actions considered necessary for the following annual period.

All monitoring shall be carried out in accordance with applicable confidentiality and personal-data protection requirements, particularly where the size of the workforce could make individual employees identifiable.

## C) EVALUATION

## D) REVISION OF THE PLAN

The Plan may be reviewed before its expiry where:

- significant organisational changes occur;
- monitoring identifies an unanticipated gender inequality;
- measures fail to achieve the intended results;
- new risks emerge;
- new institutional priorities arise;
- relevant regulatory or programme requirements change; or
- the Gender Equality Working Group proposes changes considered necessary by top management.

Any substantial revision shall be documented and approved through the appropriate institutional procedure.

Where relevant, the revised version shall also be published on INCOMA's website.

## E) RESOLUTION OF DISCREPANCIES

Questions or discrepancies regarding interpretation or implementation of the Gender Equality Plan shall initially be considered by the GEP Coordinator and Gender Equality Working Group.

The Working Group shall seek to resolve such matters through:

- review of the relevant GEP provision;
- analysis of available information and indicators;
- consultation with the people or functions concerned;
- consideration of gender equality and non-discrimination principles; and
- consultation with specialised internal or external expertise where necessary.

Where a discrepancy cannot be resolved at this level, the matter shall be referred to INCOMA's top management for a final institutional decision, without prejudice to any rights or procedures established under applicable legislation.

All persons participating in such procedures shall respect confidentiality, impartiality and protection against retaliation.

## FORMAL APPROVAL AND PUBLICATION

This Gender Equality Plan enters into force upon its formal approval by INCOMA's top management.

By adopting this Plan, INCOMA confirms its commitment to:

- equality between women and men;
- equal treatment and opportunities;
- prevention of discrimination;
- gender-sensitive organisational practices;
- dedicated resources and gender expertise;
- annual gender-disaggregated data collection and monitoring;
- annual indicator-based reporting;
- gender equality and unconscious bias training;
- prevention of sexual harassment and harassment based on sex;
- integration of gender considerations into relevant research and innovation activities; and
- continuous improvement.

Following formal approval, this document shall be **signed and/or formally adopted by top management and published on INCOMA's institutional website.**

**For International Consulting and Mobility Agency SL – INCOMA**

**Name:** Juan Guerrero Caballero

**Position:** Head of Innovation & Research Unit

**Signature:**

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**Date:** 31/08/2026

**Place:** Seville, Spain