

# Gender Equality Plan

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DID Daten-Intermediär-Dienste FlexCo (DID FlexCo)

Version 1.0 – March 2026

## 1. Organisational Context and Commitment

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DID FlexCo is a private data intermediary service provider operating under the European Data Governance Act (DGA), focusing on trusted, neutral data intermediation, identity-based data access, and governance-compliant data ecosystems.

While not formally subject to the mandatory Gender Equality Plan (GEP) requirement under Horizon Europe, DID FlexCo voluntarily adopts this plan to ensure alignment with European values of equality, inclusiveness, and responsible innovation.

Top management commits to:

- ensuring **equal opportunities** regardless of gender or background,
- fostering an **inclusive and respectful work environment**, and
- integrating equality principles into organisational and technical practices.

This GEP is publicly available and endorsed by management.

## 2. Scope and Objectives

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The objectives of this GEP are to:

- promote **gender balance and equal participation** in all organisational roles,
- ensure **fair and transparent recruitment and career progression**,
- support **inclusive working conditions and work-life balance**,
- integrate **ethical and human-centric considerations** into data governance and system design,
- prevent **discrimination, bias, and harassment**.

The plan applies to all staff, collaborators, and project-related activities.

## 3. Minimum Process-Related Requirements

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### 3.1 Publication

This GEP is published internally and made available externally (i.e., on the website and upon request), fulfilling transparency requirements.

### **3.2 Dedicated Resources**

Given the organisation's size, implementation is ensured through:

- assignment of responsibility to **management level**, and
- integration into existing governance and compliance processes.

### **3.3 Data Collection and Indicators**

To support evidence-based implementation of this Gender Equality Plan, DID FlexCo defines proportionate key performance indicators (KPIs), taking into account the organisation's size and structure. These indicators may include:

- gender distribution across organisational roles and project teams;
- gender distribution in recruitment processes, including applications and appointments, where applicable;
- participation in relevant training and awareness-raising activities.

The organisation will establish an initial baseline for these indicators and update them on a proportionate basis. Given the small size of the organisation, data collection may initially be limited and will remain appropriate to the scale of operations.

Where feasible and proportionate, DID FlexCo aims to:

- maintain or improve balanced gender representation across roles and activities;
- support fair, transparent and unbiased recruitment and participation processes.

Progress against these indicators will be reviewed annually and used to identify trends and areas for improvement.

Data collection and processing will be limited to what is necessary, proportionate and compliant with applicable data protection law, including the GDPR.

### **3.4 Training and Awareness**

DID FlexCo promotes proportionate training and awareness-raising measures in support of equality, inclusion and responsible organisational practice. Topics may include:

- awareness of unconscious bias;
- inclusive communication practices;
- leadership and diversity;
- ethical considerations in digital systems, data handling and project implementation.

Awareness measures may include lightweight formats such as:

- internal discussions or briefings on unconscious bias and inclusive practices;

- sharing of relevant guidelines, online resources or best practices;
- participation in suitable online courses or training modules, including on leadership and diversity;
- integration of ethical, inclusive and non-discriminatory considerations into project-related activities and decision-making.

Given the size of the organisation, such measures will be implemented in a proportionate and practical manner.

## 4. Key Action Areas

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### 4.1 Work-Life Balance and Organisational Culture

- Flexible working arrangements where feasible
- Respect for individual working conditions and responsibilities
- Promotion of a collaborative, respectful, and inclusive culture

### 4.2 Gender Balance in Leadership and Decision-Making

- Commitment to **gender-neutral decision-making processes**
- Consideration of diversity in leadership and project roles

### 4.3 Recruitment and Career Progression

- Transparent, merit-based recruitment processes
- Gender-neutral job descriptions and evaluation criteria
- Equal access to professional development opportunities

### 4.4 Integration of Gender Dimension into Activities

Given the organisation's role in digital infrastructure and data governance:

- consideration of **bias and fairness in data processing and algorithms**,
- promotion of **human-centric and inclusive system design**,
- alignment with European frameworks for trustworthy and ethical data use.

### 4.5 Prevention of Gender-Based Violence and Harassment

- Zero-tolerance policy towards harassment or discrimination
- Clear internal communication channels for reporting concerns
- Immediate and appropriate response to incidents

Reported incidents are handled confidentially, promptly, and in accordance with internal procedures. Appropriate measures are taken depending on the nature and severity of the

case.

## 5. Implementation and Governance

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The implementation of this GEP is ensured through:

- **Management responsibility** for oversight and updates
- Integration into **project governance and quality assurance processes**
- Periodic review and adaptation (at least once per year or per project cycle)

Given the organisation's size, a **proportionate and lightweight governance approach** is applied.

## 6. Monitoring and Continuous Improvement

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DID FlexCo commits to continuous improvement by:

- reviewing implementation progress annually,
- updating measures based on organisational evolution,
- aligning with evolving **EU policies on equality, ethics, and data governance**.

The annual review includes: a brief assessment of defined indicators, identification of any imbalances or risks, and, where necessary, definition of proportionate corrective actions.

Findings are documented internally to ensure traceability and continuous improvement.

## 7. Alignment with EU Values and Frameworks

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This GEP aligns with:

- Horizon Europe requirements on gender equality
- European principles of **non-discrimination and inclusion**
- The organisation's role as a **neutral and trustworthy data intermediary** under the Data Governance Act