

Gender Equality Plan

Flying DEMon s.r.l.

2026–2029 | Version 1.0 |

Management commitment

Flying DEMon s.r.l. commits to providing equal opportunities, a respectful working environment and fair access to recruitment, professional development, leadership and research activities. We will prevent discrimination, harassment and retaliation, and integrate sex and gender considerations into research and innovation where relevant.

This plan applies to directors, employees, founders performing operational work, researchers, interns and collaborators working for the company. Relevant conduct and safeguarding expectations also apply to contractors and partners in company activities, including field campaigns, drone operations, travel, online interactions and events.

The plan is designed around the four Horizon Europe process requirements and the five recommended thematic areas. It is proportionate to a small technology company developing airborne gamma spectroscopy, environmental mapping, soil intelligence and decision support services. Implementation will begin upon adoption, in accordance with the responsibilities and timetable set out below.

Adoption and validity

The plan takes effect on signature by the authorised company representative and remains valid until 31 December 2029, subject to annual review. Management will publish the signed version on the company website within 10 working days of adoption, communicate it to all covered persons and retain evidence of publication and communication. Any revised version will carry a version number and approval date.

By signing below, management adopts this plan and authorises the responsibilities, working time and financial allocation specified in it. Adoption must follow the company's applicable governance rules.

Francesco Giordano
Chief Executive Officer
For Flying DEMon s.r.l.

Signature _____

Bari, 30 October 2026

Public website location: to be recorded in the implementation register upon publication.

FRANCESCO
GIORDANO
30.10.2026
14:35:23
GMT+01:00



1 Governance and dedicated resources

Accountability

The CEO is accountable for delivery, resources and annual management review. From adoption, the CEO acts as interim Gender Equality Coordinator. Within 30 days, management will confirm or appoint a coordinator in writing, together with a deputy who can act where the coordinator has a conflict of interest. Duties may be combined with existing roles, but reporting safeguards must remain independent.

The coordinator maintains the action register, arranges training, collects proportionate indicators and prepares the annual report. Personnel administration supplies lawful workforce and recruitment data. Project leaders screen research activities for sex and gender relevance and apply inclusive arrangements during fieldwork. Everyone covered by the plan must respect its conduct requirements.

Time and financial resources

Management allocates a minimum of 40 coordinator working hours per full implementation year, plus at least two paid or company-authorised training hours annually for each active staff member and decision-maker. The coordinator allocation is additional to participant training time. For the remainder of 2026, at least 10 coordinator hours will be reserved for launch activities.

Management earmarks EUR 500 per full implementation year for external gender equality expertise, training materials or independent advice, with EUR 250 available for the launch period in 2026. Internal time is additional to this amount. These allocations are authorised upon adoption. Management will make further resources available when a safeguarding matter requires specialist support.

Within 30 days of adoption, management will identify a qualified external equality or employment specialist and establish an independent reporting route and arrangements for impartial case handling when needed. The coordinator will complete introductory training within 60 days of adoption. Management will record this arrangement and communicate confidential contact instructions internally.

Participation and review

All covered persons may suggest improvements or request a confidential discussion. The coordinator will offer at least one consultation opportunity each year. The CEO will review progress, resource use and corrective actions annually, and after any serious incident or substantial organisational change. The first review will take place by 31 March 2027, covering the launch period in 2026; subsequent reviews will take place by 31 March for the preceding calendar year.

Evidence and records

A restricted implementation register will hold appointment decisions, resource allocations, training attendance, recruitment checklists, project screenings, review minutes and publication evidence. A public annual progress summary will report actions and indicators only in forms that protect individuals. Case files will be stored separately with strictly limited access.

2 Equal opportunities in company activities

Work life balance and organisational culture

Managers will consider flexible scheduling and remote work where compatible with operational duties, safety and service delivery. Meetings should normally be scheduled between 09:30 and 16:30 local working time, with reasonable notice of exceptions. Field missions and travel will be planned with attention to caring responsibilities, accessibility and personal safety, without excluding people on stereotyped assumptions.

Requests concerning flexibility, parental or caring responsibilities will receive a documented response within 15 working days. Taking lawful leave or requesting reasonable flexibility must not disadvantage access to projects, training or progression. Before and after extended leave, the manager will offer a work planning or return discussion. Equipment, personal protective equipment and field arrangements will be assessed for individual fit and safe use.

Leadership and decision making

Selection for project leadership, technical coordination, client-facing duties and company representation will use documented competence criteria and transparent opportunities. When forming new discretionary committees or panels, management will seek at least 40% representation of each of women and men where feasible in view of the size of the group and the available pool, alongside inclusion of other gender identities. This is an aspirational balance target, not an automatic preference or a restriction on individual eligibility.

Where the available pool makes balance impracticable, management will record the reason and outreach measures. This plan does not alter shareholdings or statutory appointment rights. Annual review will examine who receives leadership opportunities, credit, visibility and access to decisions.

Recruitment and career development

Every recruitment process will use inclusive vacancy wording, role-related selection criteria established before assessment, a common interview framework and a brief documented selection decision. Vacancies will be circulated through channels that broaden the candidate pool. Where practicable, two trained assessors will review candidates; a sole assessor must document the decision against the same criteria.

Questions about pregnancy, family plans or other irrelevant personal circumstances will not form part of selection. Career breaks will be assessed fairly in relation to relevant experience. Employment offers, task allocation, remuneration and development opportunities will follow objective criteria. At least annually, management will review comparable roles and remuneration, investigate unexplained differences and approve corrective action where justified. Pay differences will be assessed using verified data for comparable roles where sufficient information is available; any limitations will be documented.

Each employee will be offered an annual development conversation. Access to scientific authorship, invention credit and technical training will reflect actual contributions and role requirements, with records sufficient to review fairness.

3 Research training and safe working

Sex and gender in research and innovation

For every new research proposal and substantial new product or service development, the project leader will record whether sex or gender may affect the research question, data, methods, use or impacts. Where relevant, the work plan will specify appropriate analysis, stakeholder involvement and evaluation. Where not relevant, the screening will give a scientific justification rather than a generic assertion.

For Flying DEMon, the physical measurement of soil gamma emissions may have no intrinsic sex or gender variable. Relevance can nevertheless arise in equipment ergonomics, fieldwork organisation, access to digital soil services, user interfaces, operator training and the participation of farmers or other end users. User testing should seek diverse participation where appropriate and record limitations. AI and decision support development will assess possible bias in user-related data and recommendations when such data are used.

The company does not assume a formal teaching role. When it provides technical training, internships or outreach, it will apply inclusive examples, fair participation and transparent access to mentoring. Project-specific Horizon Europe requirements remain applicable independently of this organisational plan.

Training programme

Within 90 days of adoption, active staff and decision-makers will receive a launch session of at least two hours covering equality principles, unconscious bias, fair recruitment, respectful conduct and reporting arrangements. From 2027 onwards, they will complete at least two hours of training per calendar year. If the launch session takes place in 2027, it will count towards that year's minimum training requirement. New entrants will receive an induction within 30 days and complete the core training within 90 days.

Managers and assessors will receive role-specific guidance before recruitment or appraisal duties. Research leads will receive guidance on gender relevance screening. The coordinator will retain session dates, topics, attendance and a short learning or feedback record. The target is 100% completion among persons in scope, with catch-up sessions for absences.

Prevention of violence and harassment

Sexual harassment, sex-based harassment, gender-based violence, discriminatory bullying, unwanted sexual attention and retaliation are prohibited. This includes verbal, physical, visual and digital conduct, abuse of authority and conduct during company travel or partner-hosted activities. Managers will communicate these standards and act promptly when concerns become known.

Before each field campaign, the responsible manager will review suitable transport, accommodation, supervision, communications and emergency arrangements. Safety measures must protect participants without restricting opportunities on the basis of gender. Contracts and collaboration briefings will communicate relevant conduct expectations, and suspected partner misconduct will be escalated through appropriate contractual and safeguarding channels.

4 Confidential reporting and monitoring

Reporting and independent handling

A person may report a concern orally or in writing to the coordinator or CEO, including by requesting a private meeting. If either is involved, conflicted or unsuitable, the report may be addressed in a sealed confidential letter to a non-conflicted company director or statutory representative at the company's registered office, requesting an independent external handler. Management will communicate the named internal contacts and an independent external reporting route to all covered persons within 30 days of adoption. No person implicated in a report may assess or investigate it.

Reports will be acknowledged within five working days where contact is possible. A non-conflicted handler will assess immediate protection and conflicts of interest within ten working days. An impartial review will respect confidentiality, the rights of all parties and applicable law; it will normally conclude within 45 days, or provide a reasoned update and revised timetable. These are internal service targets, not limits on statutory rights.

Proportionate interim safeguards may include changes in supervision or working arrangements without penalising the reporting person. Outcomes and any corrective or disciplinary measures will be decided by the competent non-conflicted authority under applicable law and contracts. Retaliation is prohibited. Anonymous concerns will be assessed where sufficient information is available. No one is required to confront the person concerned or attempt mediation. External legal remedies, competent authorities and emergency services remain available at all times.

Baseline and data protection

Within 60 days, the coordinator will establish the baseline from verified records; the baseline will document the workforce composition at the reference date. Employees, directors and operational founders, and other collaborators will be reported separately to avoid double counting. Headcount, reference date, population and missing data will be stated. Where no employee exists, this will be recorded explicitly rather than treated as missing evidence.

Monitoring will use sex-disaggregated administrative data where lawfully available and appropriate. Any additional gender identity question will be voluntary, with a prefer-not-to-say option and a defined lawful basis. The company will not infer identity from names or appearance. It will provide privacy information, minimise data, restrict access and define a justified retention period before collection, consistent with the GDPR.

Small populations require particular care: public tables will suppress cells below five and any complementary detail that could identify a person. Where aggregation cannot protect privacy, the public report will describe completed actions without demographic breakdowns. Restricted case information will never appear in public reports. Complaint counts will not be used as a target of zero, since low reporting does not demonstrate a safe workplace.

5 Action timetable and accountability

Action and owner	Deadline and target	Evidence
Signed publication — CEO	Within 10 working days of adoption; current signed version available	Public link and publication record
Coordinator and reporting safeguards — CEO	Appointments, external specialist and independent reporting route within 30 days	Appointment, expert arrangement and confidential staff notice
Baseline and coordinator training — Coordinator	Within 60 days; all applicable personnel categories covered	Restricted baseline and coordinator training record
Launch training — Coordinator	Within 90 days; 100% active persons in scope	Attendance and catch-up record
Recruitment and development — CEO	Every recruitment; annual development offer to every employee	Selection checklist and development log
Research relevance — Project leaders	100% new proposals and substantial developments screened	Dated screening and justification
Annual training and resources — CEO	At least 2 hours per person; 40 coordinator hours and EUR 500 annually	Training log and resource review
Annual review and reporting — Coordinator and CEO	By 31 March each year from 2027	Approved internal report and privacy-safe public summary

Annual indicator set

The annual report records workforce composition and leadership roles where privacy permits; recruitment applications, shortlists and hires where lawfully measurable; access to development and remuneration review outcomes; flexibility requests and responses; training coverage; screened projects; allocated resources; and action completion. It states denominators, unavailable data, reasons for missed targets, corrective owners and deadlines. The first report will use the verified baseline as its starting point.

European framework and adoption record

Reference: European Commission, Horizon Europe Work Programme 2026–2027, General Annexes, Part B, pages 17–18, Gender equality plans and gender mainstreaming. The four process requirements concern publication, resources, monitoring and training; this plan adopts annual reporting. Private for-profit SMEs are normally outside the GEP eligibility criterion. The applicable call and validated Participant Register category must be checked; this voluntary plan is not an EU certification or a substitute for implementation.

Official source: https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/horizon/wp-call/2026-2027/wp-15-general-annexes_horizon-2026-2027_en.pdf

Implementation register to record after adoption: signature date; publication URL and date; coordinator and deputy; independent reporting contact; baseline date; training dates; next review. Adoption is documented by the management signature above; implementation is documented in the register.