

DATA MACHINE ELITE

GENDER EQUALITY PLAN

2026–2029

Version 1.0

Effective from: 03 January 2025

Approved by: Chief Executive Officer, Data Machine Elite

Document owner: Data Machine Elite Management

1. MANAGEMENT STATEMENT

Data Machine Elite is committed to creating and maintaining an inclusive, respectful and equitable working and research environment in which all individuals have equal opportunities to contribute, develop their careers and participate in decision-making.

As a research and innovation organisation operating in technology-intensive fields, including software engineering, artificial intelligence, Internet of Things, cybersecurity, digital transformation and emerging technologies, Data Machine Elite recognises that gender equality is an important component of excellence in research and innovation.

Gender equality is therefore understood not only as a matter of equal treatment and non-discrimination, but also as an organisational and research-quality objective.

Data Machine Elite is committed to:

1. promoting equal opportunities for women and men at all levels of the organisation;
2. preventing discrimination based on sex or gender;
3. supporting an organisational culture that enables employees and researchers to reconcile professional and personal responsibilities;
4. promoting balanced participation in leadership and decision-making;
5. ensuring transparent and fair recruitment, evaluation, promotion and career-development processes;
6. addressing gender stereotypes and unconscious gender biases;

7. preventing and responding appropriately to gender-based violence, sexual harassment and other forms of harassment;
8. collecting and monitoring relevant sex-disaggregated organisational data;
9. integrating the gender dimension into research and innovation activities whenever relevant to the research topic, technology, users, datasets, algorithms, systems or expected impacts;
10. continuously improving the organisation's practices through evidence, monitoring and periodic review.

The Management of Data Machine Elite recognises that gender equality is an ongoing organisational responsibility.

This Gender Equality Plan therefore establishes a structured framework for action, accountability, monitoring and continuous improvement for the period 2026–2029.

Francisco J. Ferrão
Chief Executive Officer
Data Machine Elite

Date: 03 January 2025

2. PURPOSE AND SCOPE

The purpose of this Gender Equality Plan is to establish Data Machine Elite's institutional framework for promoting gender equality throughout its employment, research, innovation and organisational activities.

The Plan applies to:

- employees;
- researchers;
- managers and senior decision-makers;
- interns and trainees;
- temporary and project-based personnel;
- individuals participating in recruitment and selection processes;
- external researchers and collaborators, where relevant to their interaction with Data Machine Elite;
- individuals participating in Data Machine Elite research and innovation activities.

The Plan applies to all organisational functions and research activities where gender equality considerations are relevant.

The Plan covers the period from 2026 to 2029 and will be reviewed annually.

3. POLICY PRINCIPLES

Data Machine Elite adopts the following principles.

3.1 Equality of opportunity

Employment, career progression, participation in research and access to professional development shall be based on objective and relevant criteria, without discrimination based on sex or gender.

3.2 Non-discrimination

Data Machine Elite does not tolerate discrimination based on sex, gender, gender identity or gender-related characteristics, within the limits of applicable law.

3.3 Merit and transparency

Recruitment, evaluation, promotion, remuneration and allocation of responsibilities should be based on transparent, objective and consistently applied criteria.

3.4 Respect and dignity

Every person working with or for Data Machine Elite has the right to a professional environment characterised by dignity, respect and freedom from harassment.

3.5 Work-life balance

The organisation recognises the importance of enabling employees to reconcile professional responsibilities with family, caring and personal responsibilities.

3.6 Evidence-based improvement

Gender equality measures shall be informed by organisational data, monitoring and periodic evaluation.

3.7 Gender-sensitive research and innovation

Where relevant, research and innovation activities shall consider whether sex and/or gender may influence research questions, datasets, algorithms, system requirements, user needs, testing, safety, performance or societal impact.

4. GOVERNANCE AND RESPONSIBILITIES

4.1 Senior Management

The Chief Executive Officer has overall responsibility for the adoption and implementation of this Gender Equality Plan.

Management shall:

- approve the Plan;
- provide appropriate organisational support;
- ensure that responsibilities are clearly assigned;
- review annual implementation reports;
- support corrective actions where necessary;
- ensure that gender equality is considered in relevant organisational decisions.

4.2 GEP Coordinator

Data Machine Elite shall appoint a **Gender Equality Plan Coordinator**.

Name: Asad Mumtaz

Position: GEP Coordinator

The GEP Coordinator shall:

- coordinate implementation of the GEP;
- maintain the GEP documentation;
- coordinate annual monitoring;
- support collection and analysis of sex-disaggregated data;
- coordinate gender-equality awareness and training;
- monitor implementation of the action plan;
- support the integration of gender considerations into relevant research activities;
- prepare an annual GEP monitoring report;
- report significant issues to Management.

4.3 Management and Team Leaders

Managers and team leaders are responsible for implementing the principles of this Plan within their areas of responsibility.

They shall promote:

- fair allocation of opportunities;
- objective evaluation;
- inclusive team cultures;
- respectful workplace behaviour;
- transparent career development;
- appropriate work-life balance.

4.4 All Employees and Researchers

All employees and researchers are expected to:

- respect colleagues;
 - avoid discriminatory or harassing behaviour;
 - participate in relevant training;
 - contribute to an inclusive organisational culture;
 - report concerns through the appropriate channels.
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5. DEDICATED RESOURCES

Data Machine Elite commits appropriate human and organisational resources to the implementation of this Gender Equality Plan.

The organisation shall ensure that the GEP Coordinator has sufficient time and organisational access to perform the assigned responsibilities.

Where specialist expertise is required, Data Machine Elite may obtain external support in areas including:

- gender equality;
- employment law;
- organisational psychology;
- unconscious bias;
- harassment prevention;
- gender-sensitive research and innovation;
- equality data analysis.

The implementation of the GEP shall be incorporated into relevant management and organisational processes rather than treated as an isolated activity.

An annual review shall determine whether additional resources are required.

6. BASELINE ASSESSMENT AND DATA COLLECTION

Data Machine Elite shall establish a baseline for gender equality using sex-disaggregated organisational data.

The baseline shall include, where applicable:

Indicator	Women	Men	Other / Not disclosed	Total
Total personnel	1	3	0	4
Researchers	1	1	0	2
Technical personnel	0	0	0	0
Management	0	0	0	0
Senior management	0	1	0	1
Administrative personnel	0	1	0	0
Permanent personnel	1	3	0	4
Temporary/project personnel	0	0	0	0
New hires	0	0	0	0
Promotions	0	0	0	0
Training participants	0	0	0	0

Where legally and practically appropriate, data may be collected in a manner that recognises diversity while respecting privacy, confidentiality and applicable data-protection requirements.

No individual shall be identifiable through published GEP statistics.

7. ANNUAL MONITORING

Data Machine Elite shall conduct an annual review of the implementation of this Plan.

The annual monitoring process shall examine:

- workforce composition;
- recruitment;
- promotions;
- career development;
- leadership representation;
- remuneration where legally and operationally appropriate;
- access to training;
- participation in research activities;

- work-life balance measures;
- reported harassment or discrimination cases;
- gender-equality training;
- implementation of research gender-dimension assessments.

The annual report shall identify:

1. actions completed;
 2. actions in progress;
 3. actions delayed;
 4. measurable results;
 5. areas requiring corrective action;
 6. priorities for the following year.
-

8. TRAINING AND AWARENESS

Data Machine Elite shall provide appropriate awareness-raising and training activities addressing:

- gender equality;
- equal opportunities;
- unconscious gender bias;
- inclusive recruitment;
- respectful workplace behaviour;
- prevention of harassment;
- gender-sensitive research and innovation.

Training shall be particularly relevant to:

- management;
- recruitment decision-makers;
- project managers;
- researchers;
- personnel involved in performance evaluation and career progression.

The organisation shall aim to ensure that relevant personnel receive gender-equality and unconscious-bias awareness training at least once during the implementation period, with refresher activities where appropriate.

Target

By the end of 2027:

At least 80% of personnel involved in recruitment, management or research leadership shall have participated in gender-equality and unconscious-bias awareness training.

By the end of 2028:

The target shall increase to 90%.

9. WORK-LIFE BALANCE AND ORGANISATIONAL CULTURE

Data Machine Elite recognises that organisational culture and working conditions influence equality of opportunity.

The organisation shall promote, where compatible with operational requirements:

- flexible working arrangements;
- remote or hybrid work;
- reasonable flexibility around family and caring responsibilities;
- predictable planning of meetings and activities;
- fair access to professional opportunities;
- respect for personal and family responsibilities.

The organisation shall avoid organisational practices that unnecessarily disadvantage individuals with caring responsibilities.

Actions

Action 9.1

Review working arrangements annually to identify potential barriers to work-life balance.

Action 9.2

Promote flexible working arrangements where operationally feasible.

Action 9.3

Ensure that employees taking parental or caring leave are not disadvantaged in career development or access to professional opportunities.

Action 9.4

Include work-life balance considerations in annual organisational reviews.

KPIs

- Percentage of employees with access to flexible working arrangements.
 - Uptake of available flexibility measures.
 - Employee feedback concerning work-life balance.
 - Gender distribution of employees using flexibility measures.
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10. GENDER BALANCE IN LEADERSHIP AND DECISION-MAKING

Data Machine Elite recognises that balanced participation in leadership contributes to a more inclusive research and innovation environment.

The organisation shall monitor gender representation in:

- senior management;
- research leadership;
- project leadership;
- technical leadership;
- internal committees and decision-making groups.

Recruitment and promotion decisions shall be based on merit and objective criteria.

Where qualified candidates are available, Management shall actively seek diverse candidate pools for leadership and decision-making positions.

Targets

Data Machine Elite shall:

1. monitor gender representation in leadership annually;
2. ensure that leadership recruitment processes use gender-neutral and inclusive criteria;
3. identify potential barriers to women's progression into leadership positions;
4. support career-development opportunities for underrepresented genders;
5. aim for balanced representation in internal decision-making bodies, taking into account the size and composition of the relevant candidate pool.

KPIs

- Percentage of women in management.

- Percentage of women in research leadership.
 - Percentage of women in project leadership.
 - Gender distribution of internal decision-making bodies.
 - Gender distribution of promotions to leadership positions.
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11. GENDER EQUALITY IN RECRUITMENT

Data Machine Elite shall maintain recruitment procedures designed to minimise gender bias.

Recruitment processes shall, where appropriate:

- use gender-neutral language;
- focus on objective qualifications and competencies;
- avoid unnecessary gender-coded requirements;
- use consistent evaluation criteria;
- document selection decisions;
- ensure that interview and evaluation criteria are applied consistently.

Recruitment panels shall be encouraged to recognise potential unconscious bias.

Where feasible, job advertisements should communicate Data Machine Elite's commitment to equal opportunities.

Recruitment KPI framework

The organisation shall monitor:

- gender distribution of applicants;
- gender distribution of shortlisted candidates;
- gender distribution of interviewed candidates;
- gender distribution of selected candidates.

Where significant disparities occur, Management shall investigate whether organisational or procedural factors may contribute to them.

12. CAREER PROGRESSION AND PROFESSIONAL DEVELOPMENT

Data Machine Elite is committed to ensuring that career progression is based on transparent and relevant criteria.

The organisation shall promote equal access to:

- training;
- mentoring;
- research opportunities;
- leadership opportunities;
- project responsibilities;
- international collaboration;
- professional conferences and events;
- technical development.

Performance evaluation should rely on clearly defined criteria and should avoid assumptions based on gender or family status.

KPIs

- Promotion rates by gender.
 - Training participation by gender.
 - Participation in leadership-development opportunities by gender.
 - Allocation of research leadership responsibilities by gender.
 - Access to professional development opportunities by gender.
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13. REMUNERATION AND PAY EQUITY

Data Machine Elite is committed to equal remuneration for work of equal value, subject to applicable law and legitimate differences based on objective criteria such as role, qualifications, experience, responsibilities and performance.

The organisation shall periodically assess whether material gender-related pay disparities exist.

Where an unexplained disparity is identified, Management shall assess its causes and consider corrective measures.

KPI

Gender pay gap, where sufficient organisational data exists to calculate a meaningful indicator.

The organisation shall also consider pay distribution by:

- role;
 - seniority;
 - professional category;
 - management responsibility;
 - employment type.
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14. INTEGRATION OF THE GENDER DIMENSION INTO RESEARCH AND INNOVATION

Data Machine Elite recognises that gender equality in research and innovation has two complementary dimensions:

1. equality among the people conducting research;
2. consideration of sex and/or gender in the substance of research and innovation where relevant.

The second dimension shall be considered systematically during the design of relevant R&I activities.

For each significant research or innovation project, the project team should assess whether sex and/or gender may affect:

- the research question;
- target users;
- user requirements;
- datasets;
- sampling;
- algorithms;
- artificial intelligence models;
- system design;
- human-computer interaction;
- testing;
- safety;
- performance;

- accessibility;
- risk;
- societal impact;
- exploitation and deployment.

Where gender is not relevant to a particular research topic, the project team may document the rationale for its exclusion.

Research Gender Dimension Checklist

Relevant project proposals shall consider:

A. Does the research involve people or human behaviour?

If yes, assess whether sex/gender may influence the research.

B. Does the research use datasets?

If yes, assess whether the dataset may contain gender-related bias or unequal representation.

C. Does the research develop AI or machine-learning systems?

If yes, assess potential gender bias in training data, model performance, outputs and deployment.

D. Does the research develop products or services for human users?

If yes, assess whether different user groups may have different requirements, risks or experiences.

E. Could the technology produce different impacts for women and men?

If yes, integrate appropriate gender-sensitive analysis.

This process shall be integrated into relevant research planning and project documentation.

15. GENDER AND ARTIFICIAL INTELLIGENCE

Given Data Machine Elite's involvement in software, data, artificial intelligence and digital technologies, gender bias in AI deserves specific attention.

Where relevant, research teams shall consider:

- representation of women and men in training datasets;
- potential historical bias;

- differential model performance;
- demographic bias;
- unequal error rates;
- gender stereotypes in generated outputs;
- potential discriminatory outcomes;
- representativeness of testing populations.

Where relevant, project documentation should record how these risks were assessed and mitigated.

16. GENDER-BASED VIOLENCE, SEXUAL HARASSMENT AND HARASSMENT

Data Machine Elite adopts a zero-tolerance approach to:

- sexual harassment;
- gender-based harassment;
- discrimination;
- bullying based on gender;
- unwanted sexual conduct;
- intimidation;
- retaliation against individuals reporting concerns.

All employees and collaborators are expected to maintain professional and respectful conduct.

16.1 Confidential reporting

Data Machine Elite shall maintain a confidential mechanism through which individuals can report concerns.

Reporting contact: [TO BE COMPLETED]

Alternative reporting contact: [TO BE COMPLETED]

Reports shall be treated seriously, confidentially and in accordance with applicable law and internal procedures.

16.2 Protection against retaliation

No individual shall suffer retaliation for making a good-faith report of discrimination, harassment or inappropriate behaviour.

16.3 Investigation

Where appropriate, complaints shall be investigated through an impartial process.

The organisation shall respect:

- confidentiality;
 - procedural fairness;
 - protection of affected individuals;
 - applicable employment and data-protection law.
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17. INCLUSIVE ORGANISATIONAL CULTURE

Data Machine Elite shall promote a culture in which people are evaluated according to their contribution, competence and professional conduct rather than gender stereotypes.

The organisation shall encourage:

- inclusive communication;
- respectful collaboration;
- diverse perspectives;
- equitable participation in meetings;
- recognition of different career paths;
- mentoring and knowledge sharing.

Managers shall be encouraged to monitor whether particular individuals or groups are systematically excluded from informal or formal opportunities.

18. COMMUNICATION

The Gender Equality Plan shall be formally published on the Data Machine Elite website following approval by the Chief Executive Officer.

The organisation shall communicate the existence and objectives of the GEP internally.

Employees shall be informed about:

- the purpose of the GEP;
- relevant policies;

- reporting mechanisms;
- training opportunities;
- annual progress.

The public version of the GEP shall not contain personal or confidential employee information.

19. MONITORING FRAMEWORK

The following core indicators shall be monitored annually.

Area	KPI	Frequency	Responsible
Workforce	Gender distribution	Annual	GEP Coordinator
Leadership	Women/men in leadership	Annual	Management
Recruitment	Applicants by gender	Annual	HR/Management
Recruitment	Hires by gender	Annual	HR/Management
Career	Promotions by gender	Annual	Management
Training	Training participation by gender	Annual	GEP Coordinator
Pay	Gender pay gap	Annual where feasible	Management
Work-life balance	Use of flexible arrangements	Annual	Management
Research	Projects assessed for gender dimension	Annual	Research Leads
AI	AI projects assessed for gender bias	Annual	Research Leads
Harassment	Reports and cases	Annual, aggregated	Management
Culture	Staff feedback	Periodic	Management

20. TARGETS 2026–2029

Data Machine Elite establishes the following institutional targets.

Target 1, Governance

A GEP Coordinator shall be formally designated by 2026.

Target 2, Publication

The approved GEP shall be publicly available on the Data Machine Elite website.

Target 3, Data

Sex-disaggregated organisational data shall be collected and reviewed annually.

Target 4, Training

At least 80% of relevant managers, recruitment decision-makers and research leaders shall complete gender-equality and unconscious-bias training by the end of 2027.

The target shall increase to 90% by the end of 2028.

Target 5, Recruitment

Gender-disaggregated recruitment data shall be monitored annually.

Target 6, Career progression

Promotion and professional-development opportunities shall be monitored by gender.

Target 7, Leadership

Gender representation in management and research leadership shall be monitored annually and barriers to balanced representation shall be assessed.

Target 8, Research

All relevant R&I projects initiated from 2027 onwards shall include a documented assessment of whether sex and/or gender are relevant to their research content.

Target 9, AI

Relevant AI and data-driven research projects shall assess potential gender bias in datasets, models and outcomes.

Target 10, Harassment

All personnel shall have access to clear information about the organisation's prohibition of harassment and available reporting mechanisms.

Target 11, Annual review

An annual GEP monitoring review shall be completed during each year of the Plan.

21. IMPLEMENTATION ACTION PLAN

No.	Action	Responsible	Deadline	KPI
1	Appoint GEP Coordinator	CEO	Q3 2026	Coordinator appointed
2	Publish GEP	Management	Q3 2026	GEP publicly available
3	Establish gender baseline	GEP Coordinator	Q4 2026	Baseline completed
4	Establish annual data collection	GEP Coordinator	Q4 2026	Data framework operational
5	Implement gender/unconscious bias training	Management	2027	≥80% relevant staff trained
6	Review recruitment practices	Management	Annual	Recruitment indicators
7	Monitor career progression	Management	Annual	Promotion indicators
8	Review leadership balance	Management	Annual	Leadership indicators
9	Review work-life balance	Management	Annual	Review completed
10	Establish R&I gender-dimension assessment	Research Leads	2027	Relevant projects assessed

No.	Action	Responsible	Deadline	KPI
11	Implement AI gender-bias assessment	Research Leads	2027	Relevant AI projects assessed
12	Review harassment prevention procedures	Management	Annual	Review completed
13	Prepare annual GEP report	GEP Coordinator	Annual	Report completed
14	Review and update GEP	Management	Annual	Updated where necessary

22. ANNUAL REVIEW CYCLE

The GEP shall follow a continuous improvement cycle:

Assess → Plan → Implement → Monitor → Evaluate → Improve

Assess

Collect and analyse organisational data.

Plan

Identify areas requiring intervention and establish measurable actions.

Implement

Execute the approved actions.

Monitor

Measure progress using agreed indicators.

Evaluate

Assess effectiveness and identify gaps.

Improve

Update actions, targets and policies as appropriate.

23. DATA PROTECTION AND CONFIDENTIALITY

All data collected under this GEP shall be handled in accordance with applicable data-protection legislation and internal data-protection policies.

Gender-disaggregated data shall be used for organisational monitoring and equality purposes and shall not be used to identify or disadvantage individuals.

Where sample sizes are too small to protect confidentiality, data may be aggregated or omitted from public reporting.

24. INCLUSIVENESS AND INTERSECTIONALITY

Data Machine Elite recognises that gender may intersect with other characteristics and circumstances that can affect equality of opportunity.

Where appropriate and legally permissible, the organisation shall consider intersectional factors when analysing barriers to participation and career development.

Such considerations may include, depending on the context:

- disability;
- age;
- caring responsibilities;
- nationality or international background;
- socioeconomic circumstances;
- other relevant characteristics protected under applicable law.

The purpose is not to collect unnecessary personal information, but to ensure that equality measures are sufficiently inclusive.

25. LINK WITH RESEARCH AND INNOVATION QUALITY

Data Machine Elite considers gender equality to be connected to research quality, organisational excellence and innovation.

A diverse research environment can contribute to:

- broader perspectives;

- improved identification of user needs;
- stronger challenge of assumptions;
- improved understanding of societal impacts;
- more inclusive technology;
- improved identification of bias;
- more robust research outcomes.

Gender equality shall therefore be considered as part of Data Machine Elite's wider commitment to responsible, high-quality and socially relevant research and innovation.

26. GOVERNANCE OF THE PLAN

This GEP shall be reviewed at least annually.

The review may result in:

- new actions;
- revised targets;
- updated indicators;
- additional training;
- organisational changes;
- amendments to reporting procedures.

Material changes shall be approved by Management.

The current approved version shall remain publicly accessible.

27. PUBLICATION AND TRANSPARENCY

Following formal approval, this Gender Equality Plan shall be published on the official Data Machine Elite website.

The published version shall include:

- organisation name;
- title of the Plan;
- implementation period;
- approval date;
- signature or formal approval by senior management;

- version number.

The organisation shall ensure that the document remains accessible throughout its implementation period.

28. APPROVAL

This Gender Equality Plan has been reviewed and approved by the senior management of Data Machine Elite.

The organisation commits to implementing the measures described in this Plan and to reviewing progress annually.

For and on behalf of Data Machine Elite

Francisco J. Ferrão
Chief Executive Officer

Signature: _____

Date: 11 August 2026

ANNEX I

GEP BASELINE DATA TEMPLATE

The following data shall be completed during the initial implementation phase.

Personnel

Indicator	Women	Men	Other / Not disclosed	Total
Total workforce				
Researchers				
Engineers				
Management				
Senior management				
Administrative staff				

Recruitment

Indicator	Women	Men	Other / Not disclosed	Total
Applicants				

Indicator	Women	Men	Other / Not disclosed	Total
Shortlisted				
Interviewed				
Hired				

Career progression

Indicator	Women	Men	Other / Not disclosed	Total
Promotions				
Leadership appointments				
Training participation				
Research leadership				

ANNEX II

RESEARCH GENDER-DIMENSION ASSESSMENT

For each relevant research project, the project leader shall consider:

1. Research objectives

Could sex or gender affect the research question or objectives?

Yes / No / Not applicable

2. Users

Could women and men have different needs, behaviours, experiences or risks as users?

Yes / No / Not applicable

3. Data

Could the datasets used contain gender imbalance or gender-related bias?

Yes / No / Not applicable

4. AI and algorithms

Could gender-related bias affect the model, algorithm or system?

Yes / No / Not applicable

5. Testing

Should testing involve balanced or gender-sensitive samples?

Yes / No / Not applicable

6. Safety

Could safety risks differ by sex or gender?

Yes / No / Not applicable

7. Impact

Could the expected societal, economic or technological impact differ by gender?

Yes / No / Not applicable

8. Conclusion

If sex/gender is relevant, describe the measures incorporated into the research design.

If sex/gender is not relevant, briefly explain why.

ANNEX III

ANNUAL GEP MONITORING REPORT

Reporting year: _____

1. Workforce composition

Summary of gender-disaggregated workforce data.

2. Recruitment

Summary of recruitment indicators.

3. Career progression

Summary of promotions, leadership appointments and professional-development opportunities.

4. Training

Number and percentage of personnel participating in gender-equality and unconscious-bias training.

5. Work-life balance

Measures implemented and utilisation indicators.

6. Research and innovation

Number and percentage of relevant projects assessed for gender dimension.

7. AI and data

Number and percentage of relevant AI/data projects assessed for gender bias.

8. Harassment and discrimination

Aggregated information concerning reports and actions, respecting confidentiality.

9. Progress against targets

Target	Status	Evidence	Corrective action
GEP governance			
Data collection			
Training			
Recruitment			
Career progression			
Leadership			
Research gender dimension			
AI bias assessment			
Harassment prevention			

10. Priorities for the following year

GEP Coordinator: _____

Management approval: _____

Date: _____

ANNEX IV

DOCUMENT CONTROL

Field	Information
Organisation	Data Machine Elite
Document	Gender Equality Plan
Period	2026–2029
Version	1.0
Effective date	11 August 2026
Owner	Data Machine Elite Management
Coordinator	Asad Mumtaz
Approved by	Chief Executive Officer
Publication	Data Machine Elite website
Review	Annual