



PUBLIC INSTITUTIONAL POLICY

Gender Equality Plan

GEP

Equal opportunity, responsible research and an inclusive deep-tech workplace.

ORGANIZATION

FRESHDATA

DOCUMENT STATUS

Public policy

ISSUE

September 2026

**01 / FOUNDATION**

Purpose, scope and document profile

This Plan sets out the institutional framework guiding FRESHDATA's approach to gender equality across employment, research, innovation and professional collaboration.

ORGANIZATION FRESHDATA	DOCUMENT Gender Equality Plan (GEP)
STATUS Public institutional policy	ISSUE September 2026
DOCUMENT OWNER Management and relevant HR functions	REVIEW CYCLE At least annually
FRAMEWORK Structured with reference to Horizon Europe GEP requirements	CONTACT info@freshdatatechnology.com

Our vision

FRESHDATA believes that scientific and technological excellence should be supported by equal opportunity. As we grow from a research-driven startup into an international deep-tech company, we are committed to building an organization in which people can contribute, develop and lead based on their abilities, ideas and achievements.

Scope

The Plan applies, as relevant, to employees, managers, interns, candidates, researchers and individuals collaborating with FRESHDATA. It guides recruitment, employment, career development, research and innovation activities, workplace conduct and professional collaboration. Its implementation remains proportionate to the organization's size, operational needs and applicable legal requirements.



02 / PRINCIPLES

The standards guiding our decisions

Five practical principles connect the Plan's commitments to daily decisions and organizational growth.

1**Equal opportunity**

Access to recruitment, development and responsibility should not be limited by gender or family circumstances.

2**Merit and transparency**

Selection and progression are based on role-related competence, performance, contribution and potential.

3**Respect and inclusion**

Professional conduct should protect dignity and support an environment in which different perspectives can contribute.

4**Accountability**

Management, relevant HR functions and employees share responsibility for implementing this Plan within their roles.

5**Continuous improvement**

Relevant evidence, feedback and implementation experience will inform periodic review and practical improvement.

Institutional commitment

- Maintain fair, transparent and merit-based recruitment and career practices.
- Support equitable access to development, technical responsibility, mentoring and leadership opportunities.
- Promote work-life balance and a respectful organizational culture, where compatible with operational and project requirements.
- Consider gender and diversity dimensions in research and innovation where relevant to the question, application, user group or expected impact.
- Prevent discrimination, harassment, intimidation, bullying and retaliation, and treat concerns seriously and confidentially to the extent legally permissible.



03 / ACTION AREAS

Fair access and professional advancement

The first two action areas address how people enter, develop within and contribute to the organization.

1 Recruitment and Equal Opportunity

FRESHDATA is committed to fair, transparent and merit-based recruitment.

Recruitment and selection decisions are based on the qualifications, competencies, experience and potential required for each position. Job advertisements should use inclusive language, and candidate assessment should use structured, role-related evaluation criteria.

Particular attention is given to encouraging diverse candidate pools in technical and engineering positions where women and other groups may be underrepresented. This encouragement does not replace merit-based selection.

Gender, sexual orientation, religion or belief, nationality, marital status, pregnancy, or family responsibilities shall not constitute grounds for discrimination in recruitment or employment decisions.

2 Career Development, Leadership and Decision-Making

FRESHDATA aims to provide equitable access to professional development, technical responsibilities, mentoring and leadership opportunities.

As the organization grows, gender representation across technical, managerial and decision-making positions will be reviewed. Career progression and the assignment of responsibilities will be based on competence, performance, contribution and organizational needs.

FRESHDATA particularly encourages the visibility and professional advancement of women in engineering, research, entrepreneurship and technology leadership.

Development opportunities and decision-making responsibility should be allocated through consistent, role-relevant and transparent considerations.



03 / ACTION AREAS

Inclusive culture and responsible innovation

These action areas connect organizational culture with the way research-driven technology is planned, developed and evaluated.

3 Work-Life Balance and Organizational Culture

FRESHDATA promotes a working culture based on mutual respect, collaboration, flexibility and individual responsibility.

Where compatible with operational and project requirements, flexible working practices may be used to support employees in balancing professional and personal responsibilities.

Parental and family responsibilities should not create disadvantages in access to career development, responsibility or professional opportunities. Inclusive and respectful language is expected in internal and external communication.

Work-life balance measures will be considered proportionately and consistently, taking account of both individual circumstances and operational requirements.

4 Gender Equality in Research and Innovation

As a research-driven technology company, FRESHDATA recognizes the importance of diversity in the development of emerging technologies.

Where relevant to the research question, application, user group or expected impact, gender and diversity dimensions will be considered during research planning, requirements definition, technology design, testing, evaluation, stakeholder analysis and impact assessment.

FRESHDATA seeks to encourage women's participation in R&D, engineering and innovation, including research projects, intellectual property development, scientific dissemination and technology commercialization.



03 / ACTION AREAS

A safe, respectful and aware workplace

The final two action areas establish behavioral expectations and a proportionate approach to awareness as the organization grows.

5 Prevention of Discrimination and Harassment

FRESHDATA has zero tolerance for discrimination, sexual harassment, gender-based harassment, intimidation, bullying or retaliation.

All employees and collaborators are expected to contribute to a professional environment based on dignity and mutual respect.

Concerns will be treated seriously and, to the extent appropriate and legally permissible, confidentially. Individuals who raise concerns or participate in a review in good faith should be protected from retaliation.

Good-faith concerns will be handled through appropriate organizational procedures, with protection from retaliation and confidentiality to the extent legally permissible.

6 Awareness and Organizational Development

FRESHDATA will provide proportionate gender equality awareness-raising and/or training for staff and decision-makers as the organization grows.

Relevant awareness, guidance and training themes include gender equality, unconscious bias, inclusive recruitment, respectful workplace behavior, prevention of harassment and inclusive communication.

Relevant activities and participation will be documented and reviewed as part of the GEP monitoring cycle. Managers and people involved in recruitment, evaluation, leadership or decision-making are particularly relevant audiences.

Awareness activities, participation and resulting actions will be documented proportionately when they occur.

**04 / IMPLEMENTATION**

Governance, responsibility and resources

Implementation is coordinated institutionally and scaled to FRESHDATA's size, needs and stage of growth.

Governance and coordination

FRESHDATA Management and relevant HR functions coordinate implementation, monitoring and review. Management retains executive responsibility for integrating the Plan into applicable organizational processes.

Dedicated resources

Appropriate management and HR time, operational resources and access to appropriate gender equality expertise, internally or externally, will be allocated proportionately for implementation, monitoring, awareness activities, handling concerns and periodic review.

Recruitment and people decisions

Managers and anyone participating in recruitment, evaluation, progression or assignment decisions are expected to apply the Plan's principles consistently and to use role-relevant criteria.

Employees and collaborators

Everyone working with FRESHDATA is expected to maintain respectful professional conduct, support an inclusive culture and raise concerns or improvement suggestions through appropriate channels.

Implementation approach

Actions under this Plan will be prioritized according to organizational need, legal obligations, available evidence and practical feasibility. Where a commitment requires a new process, the responsible functions will define a proportionate method, communicate it to the relevant people and retain appropriate records.

01**Assign**

Confirm responsibility for each applicable action.

02**Implement**

Integrate practical measures into relevant processes.

03**Document**

Retain proportionate evidence of actions and outcomes.

04**Review**

Evaluate findings and decide on improvements.



05 / MONITORING

Evidence, indicators and data protection

FRESHDATA will progressively monitor relevant gender-disaggregated indicators, subject to organizational size, data availability and applicable privacy requirements. Aggregated and privacy-preserving results will be reported at least every two years.

MONITORING AREA	INDICATIVE EVIDENCE	REVIEW USE
Workforce representation	Gender representation in the workforce and relevant organizational functions.	Identify material representation patterns and priority areas.
Recruitment	Aggregated applicant and recruitment outcome data, where lawfully available and meaningful.	Review reach, consistency and outcomes of recruitment processes.
Technical roles	Representation in engineering, R&D; and other technical responsibilities.	Inform outreach, development and retention measures.
Career development	Participation in relevant development, mentoring or responsibility-building opportunities.	Check equitable access and address material barriers.
Leadership and decisions	Representation in managerial, leadership and decision-making roles.	Support transparent succession and responsibility planning.
Awareness activities	Delivery and participation records for relevant guidance or training, when activities occur.	Assess coverage and future awareness needs.
Workplace concerns	Aggregated, confidentiality-preserving information on themes and resolution steps, where appropriate.	Identify systemic risks without exposing personal information.

Annual review

Relevant indicators should normally be reviewed at least annually. Small sample sizes will be interpreted cautiously, and the absence of statistically meaningful data will not be presented as evidence of success.

Privacy by design

Personal data will be limited to what is relevant and lawful, protected against inappropriate access and reported in a way that reduces identification risk, particularly in a small organization.



06 / REVIEW AND CONTACT

Continuous improvement and responsible reporting

Gender equality is treated as an ongoing organizational responsibility rather than a one-time initiative.

Review commitment

The Plan will normally be reviewed at least annually and may be updated earlier where organizational growth, regulatory developments, working practices or implementation experience require revision. Findings from indicators, feedback, concerns and completed actions will inform future HR practices and updates to this Plan.

01	02	03	04	05
Assess	Plan	Implement	Monitor	Improve

GEP, equality and workplace concerns contact

Questions, feedback, suggestions or concerns may be shared through the contact below. Concerns will be handled seriously and, to the extent appropriate and legally permissible, confidentially. Good-faith reporting should not result in retaliation.

info@freshdatatechnology.com

This governance contact does not replace any legal or contractual reporting route that may apply.

FORMAL ADOPTION / MANAGEMENT RECORD

This Gender Equality Plan has been formally adopted by the Chief Operating Officer (COO) of FRESHDATA with effect from 1 September 2026.

Adopting authority: Chief Operating Officer (COO), FRESHDATA Effective date: 1 September 2026

Ayga Osunlu
COO

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