

Gender Equality Plan

2026–2029

A public, management-endorsed framework for equal opportunity, inclusive organisational culture, responsible research and innovation, and measurable institutional progress.

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This is the authoritative public version of the Plan. It is published in full and may be redistributed unaltered.

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MANAGEMENT STATEMENT

Our commitment

POMS Cloud Ltd. is committed to providing an equitable, respectful and inclusive working environment in which employment, leadership, career development and participation in research and innovation are based on competence, performance and transparent criteria. The company does not tolerate discrimination, harassment, retaliation or gender-based violence, and seeks to identify and remove structural or behavioural barriers that may lead to unequal outcomes.

This Gender Equality Plan establishes the governance, resources, monitoring, training and action framework for the period 2026–2029. It is designed in alignment with the European Commission's Gender Equality Plan framework under Horizon Europe. As a private for-profit company, POMS Cloud Ltd. is not automatically within the categories for which the Horizon Europe GEP eligibility criterion applies; the company nevertheless adopts the same core process standards voluntarily, as a good-practice and R&I governance framework.

POMS Cloud Ltd. commits to: publish this Plan; allocate responsible ownership and implementation capacity; collect and review appropriate sex/gender-disaggregated organisational data; provide recurring awareness and bias training; and review progress through measurable indicators at least annually.

This document was approved by top management and is published in full.

SECTION 1

Purpose, scope and principles

The purpose of this Plan is to translate POMS Cloud Ltd.'s commitment to gender equality into operational responsibilities, decision rules, measurable actions and evidence. The Plan applies to all employees, directors, managers, interns, trainees and applicants and, where relevant, to contractors and project participants working under POMS Cloud Ltd.'s control.

1.1 Core principles

- **Equal opportunity.** Employment and project decisions are based on role-relevant competence, objective criteria and documented business needs.
- **Equal treatment and dignity.** No person should experience less favourable treatment, harassment or retaliation on grounds of sex, gender, pregnancy, maternity, family status or other characteristics protected under applicable law.
- **Inclusive gender equality.** Gender is considered together with other factors that may compound disadvantage, while respecting privacy and the voluntary nature of sensitive self-identification.
- **Evidence-based action.** Measures are informed by proportionate data, qualitative feedback and documented review rather than assumptions.
- **Privacy by design.** Monitoring and reporting are aggregated and minimised to prevent the identification of individuals in a small organisation.
- **Responsible innovation.** Where relevant, the gender dimension is considered in AI, software, datasets, user research, evaluation and product design.

1.2 Relationship to Horizon Europe

The European Commission identifies four minimum process-related building blocks for a Horizon Europe-aligned GEP: publication and top-management endorsement; dedicated resources; data collection and annual monitoring; and training and awareness raising. It further recommends measures on work–life balance and organisational culture, gender balance in leadership and decision-making, gender equality in recruitment and career progression, the integration of the gender dimension into R&I content, and measures against gender-based violence including sexual harassment. This Plan covers all of these elements.

SECTION 2

Governance and dedicated resources

2.1 Accountability

Top management is accountable for the adoption, resourcing and annual review of this Plan. Day-to-day coordination is assigned to a Gender Equality Plan Coordinator, appointed by the Director. In a small-company setting this function may be combined with HR, operations, compliance or project-management responsibilities, provided sufficient independence and confidentiality are maintained.

2.2 Roles

ROLE	KEY RESPONSIBILITY
Director / top management	Approve the Plan; allocate resources; review annual indicators; ensure corrective actions; endorse public reporting.
GEP Coordinator	Maintain the action register; coordinate data collection and training; advise managers; prepare the annual review; act as first point of contact for policy questions.
People/HR or delegated administration	Maintain recruitment, pay-band, promotion, leave and training records; implement privacy controls; support equal-opportunity processes.
Managers and project leads	Apply transparent staffing and promotion criteria; support flexible-work arrangements; include gender relevance screening in R&I activities; escalate concerns.
All personnel	Complete required training; contribute to a respectful culture; use reporting channels responsibly; avoid retaliation.

2.3 Dedicated implementation resources

- Minimum annual management review time and coordinator capacity sufficient to maintain the action register, monitoring and reporting.
- Budget provision, where required, for external specialist advice, training, confidential employee support or the investigation of serious complaints.
- Time allocation for managers and staff to attend training and participate in equality-related reviews without disadvantage.
- Access to legal, data-protection or employment-law advice where a measure or case requires specialist interpretation.

SECTION 3

Data collection, monitoring and annual reporting

POMS Cloud Ltd. establishes a baseline within 60 days of adoption and updates it annually. Data collection is proportionate to company size and uses lawful, purpose-limited sources. Where self-identification beyond legally recorded sex is used, participation is voluntary.

3.1 Minimum monitoring indicators

- Headcount and FTE by sex/gender where lawfully available, by organisational function, seniority and employment type.
- Recruitment pipeline: applications, interview stages, offers and hires, analysed in aggregate where sample size permits.
- Promotions, role changes, development opportunities and participation in leadership or decision-making groups.
- Pay bands and compensation outcomes, including an annual check for unexplained gender-related disparities in comparable roles.
- Turnover, retention, parental and family leave, and return-to-work outcomes, reported only at a level that preserves confidentiality.
- Training completion rates and qualitative feedback on organisational culture.
- Reported cases of harassment or discrimination, outcomes and response times, using strictly aggregated statistics.

3.2 Privacy and small-number protection

Public reporting does not disclose personal data. As a default internal safeguard, demographic cells containing fewer than five persons are not published or circulated beyond those with a legitimate need to know. Where even aggregate figures could reasonably identify an individual, POMS Cloud Ltd. uses narrative reporting, ranges or combined categories instead.

3.3 Annual GEP report

The GEP Coordinator prepares an annual report covering progress against actions and KPIs, notable trends, training completion, material incidents or lessons learned, corrective actions and priorities for the following year. A public summary of that report is made available alongside this Plan, without confidential personnel information.

SECTION 4

Training and awareness

Training is a core implementation mechanism. All new personnel receive an introduction to equal opportunity, respectful conduct and reporting channels. Managers, hiring decision-makers and project leads receive additional training on unconscious bias, structured decision-making and responsible research and innovation.

AUDIENCE	FREQUENCY	MINIMUM CONTENT
All personnel	Onboarding, plus a refresher at least every 24 months	Equal opportunity; respectful workplace; bystander awareness; reporting channels; non-retaliation.
Managers and hiring decision-makers	At least annually	Unconscious bias; structured recruitment; objective performance assessment; flexible-work decisions; handling

AUDIENCE	FREQUENCY	MINIMUM CONTENT
		concerns.
R&I, AI and product leads	At least annually, or at project onboarding	Gender relevance screening; representative data; bias testing; user impact; inclusive evaluation and documentation.
GEP Coordinator	As needed, minimum annual update	Policy developments; monitoring methodology; confidentiality; complaint triage; escalation routes.

SECTION 5

Work–life balance and organisational culture

POMS Cloud Ltd. seeks to ensure that performance and career progression do not depend on unnecessary presenteeism or on availability outside reasonable working patterns. Flexible arrangements are considered on the basis of role requirements, team continuity, information security and business needs, using consistent criteria.

- Promote meeting practices that reduce avoidable early-morning, late-evening or family-unfriendly scheduling.
- Ensure that parental, caregiving or family-related leave does not create adverse assumptions about commitment, competence or promotion readiness.
- Offer proportionate flexibility in working time and location where the role and contractual arrangements allow it.
- Encourage managers to assess outputs, quality, collaboration and delivery rather than visibility or unnecessary working hours.
- Include respectful communication, psychological safety and inclusion in periodic culture reviews.

SECTION 6

Gender balance in leadership and decision-making

The objective is to widen access to leadership, technical authority and decision-making opportunities, and to identify unexplained imbalances. Appointments remain merit-based and must comply with applicable law.

- Annual review of gender distribution across management, technical leadership, project leadership and formal decision-making groups.
- Transparent role descriptions and documented selection criteria for leadership and project-lead opportunities.
- Where a decision-making body has at least five members and qualified candidates are available, the company aims to avoid a composition in which one gender represents less than 40%, without applying unlawful quotas or compromising competence requirements.
- Visible development opportunities, mentoring or stretch assignments offered across genders on transparent selection criteria.
- Where material imbalance persists, likely causes are documented and proportionate corrective actions defined.

SECTION 7

Recruitment, career development and equal pay

7.1 Recruitment

- Job descriptions use role-relevant, gender-neutral language and avoid unnecessary requirements that may narrow the qualified candidate pool.
- Vacancies are advertised through channels appropriate to reaching diverse qualified candidates where practicable.
- Interviewers use a common set of role-related evaluation criteria and document material hiring decisions.
- At least two evaluators participate in final hiring decisions for regular professional roles where operationally feasible.
- Questions or decisions related to pregnancy, family planning, caregiving or other protected matters are prohibited, except where legally required and directly relevant.

7.2 Career progression and pay

- Performance and promotion criteria are communicated and applied consistently, taking account of role level, responsibilities, skills and demonstrable contribution.
- Access to training, conferences, client exposure, R&I leadership and high-visibility assignments is reviewed for systematic gender imbalance.
- An annual pay-equity review compares compensation for comparable work, accounting for legitimate factors such as role, seniority, experience, performance, market scarcity and working time.
- Any material unexplained disparity identified by the review is investigated and, where confirmed, addressed through appropriate corrective action.

SECTION 8

Gender dimension in research, innovation, AI and software development

Because POMS Cloud Ltd. works in technology and development contexts, gender equality is relevant not only to employment but also, where appropriate, to the content and quality of research and innovation. A gender dimension is not assumed to be relevant to every technical task; it is screened explicitly and documented when relevant to users, datasets, models, generated content, interfaces, accessibility, evaluation or societal impact.

8.1 Minimum project screening

- Does the system directly or indirectly model, classify, recommend, generate content for, or make decisions affecting people?
- Could user needs, language, behaviour, safety, accessibility or outcomes differ by sex or gender?
- Do datasets, prompts, labels, benchmarks, user-research samples or test populations risk under-representation or stereotypical patterns?
- Could model outputs reproduce or amplify gender stereotypes, harassment, exclusion or differential quality?
- Are evaluation metrics capable of detecting material performance differences across relevant user groups?

- Where gender is not relevant, can that conclusion be justified briefly and revisited if scope or evidence changes?

8.2 Development and validation measures

- Use representative and lawfully obtained data where demographic representation is relevant to system performance.
- Include bias and harmful-content checks in evaluation plans for AI or generative systems where relevant.
- Document known dataset limitations, exclusions and residual risks in project or model documentation.
- Include diverse user perspectives in requirements, usability testing or expert review when user-facing outcomes may vary materially.
- Escalate significant gender-related safety or quality issues through the project risk process and track remediation.

SECTION 9

Prevention of gender-based violence and sexual harassment

POMS Cloud Ltd. applies zero tolerance to gender-based violence, sexual harassment, unwanted sexual conduct, stalking, coercion, discriminatory harassment and retaliation — in the workplace, at work-related events, in online collaboration environments, during business travel and in other work-connected contexts.

9.1 Reporting and response

- Personnel may report concerns to the Director, the GEP Coordinator or another designated confidential contact. If the concern involves one of these persons, an alternative independent contact or external adviser is used.
- Reports are acknowledged promptly, normally within three working days, subject to urgency and safety considerations.
- An initial assessment and proposed handling route are normally defined within ten working days, recognising that complex or serious cases may require immediate legal or specialist involvement.
- Information is shared strictly on a need-to-know basis. Confidentiality cannot be guaranteed where disclosure is legally required or necessary to protect safety or procedural fairness.
- No person is penalised for raising a concern in good faith, participating in an investigation or seeking support.
- Interim measures may be used to protect people or evidence without prejudging the outcome.

External stakeholders — including partners, suppliers, consortium members and visitors — may raise concerns about conduct connected to POMS Cloud Ltd.'s work through the contact route set out at the end of this Plan.

SECTION 10

Implementation roadmap and KPI framework

The following roadmap converts the Plan into auditable actions. Targets are designed for a technology SME and are interpreted proportionately where the number of employees or recruitment events is too small for statistically meaningful comparison.

ID	ACTION	OWNER	TIMING	EVIDENCE	TARGET
A1	Publish and formally approve the Plan	Director	2026 Q3	Public GEP available; management approval recorded	Complete on adoption
A2	Establish baseline and privacy-safe dashboard	GEP Coordinator	Within 60 days	Baseline dataset and KPI register	100% of defined core indicators assessed
A3	Standardise recruitment templates and scorecards	People/HR and hiring leads	2026 Q4	Vacancy template; interview scorecard	100% of regular hires use structured criteria from 2027
A4	Launch training programme	GEP Coordinator	2026 Q4, recurring	Attendance and completion records	≥90% staff completion in first cycle; 100% of hiring managers annually
A5	Annual pay-equity review	Director and People/HR	Annually	Confidential review note and actions	100% annual completion; all material unexplained gaps investigated
A6	Leadership and project-lead balance review	Director	Annually	Leadership distribution and action note	Annual review; corrective action where imbalance is unexplained
A7	R&I gender relevance screening	Project and R&I leads	From 2026 Q4	Project screening record	100% of new material R&I projects screened
A8	Harassment reporting protocol and contacts	Director and GEP Coordinator	2026 Q4	Internal protocol and contact routes	100% of staff informed; reports acknowledged normally ≤3 working days
A9	Annual GEP report and review	GEP Coordinator and Director	Annually	Public summary and internal action review	Published once per year
A10	Comprehensive GEP renewal	Director	By 31 Aug 2029	Revised or renewed Plan	Renewal decision completed before expiry

SECTION 11

Reporting, review and publication

- This Plan is published on the company's public website following approval and remains publicly accessible for the duration of its validity.
- The GEP Coordinator maintains an internal action register containing owners, due dates, evidence, status and corrective actions.
- Top management reviews progress at least annually and approves the priorities for the following cycle.
- Material legal, organisational or workforce changes may trigger an out-of-cycle review.
- The Plan will be comprehensively reviewed no later than 31 August 2029. It may be renewed earlier if required by a funding programme, customer, consortium or regulatory change.

11.1 Non-retaliation and continuous improvement

Good-faith feedback about equality measures, data quality, training, recruitment, R&I impacts or inappropriate conduct is encouraged. The purpose of monitoring is institutional improvement, not individual blame. Findings are used to refine policies, processes, training and project controls.

SECTION 12

Approval

By approving this Gender Equality Plan, POMS Cloud Ltd. commits to its implementation, resourcing, monitoring and periodic review. The Plan took effect on 27 August 2026. The signed original is held at the company's registered office and is available on request.

ORGANISATION	POMS Cloud Ltd.
APPROVED BY	Szilard Beres, Director
DATE OF APPROVAL	27 August 2026
NEXT SCHEDULED REVIEW	27 August 2027

ANNEX A

Annual monitoring dashboard

The dashboard below is the minimum annual review set. “Not applicable” is accepted only where an indicator is genuinely not relevant or cannot be reported without unreasonable re-identification risk.

AREA	INDICATOR	FREQUENCY	CONTROL / TARGET
Workforce composition	Headcount and FTE by role and level	Annual	Trend reviewed; no unexplained material imbalance
Recruitment	Applicants, interviews, offers and hires where reportable	Annual	Structured criteria used in 100% of regular hires
Leadership	Gender distribution of managers and project leads	Annual	Material imbalance reviewed and actioned where justified
Career progression	Promotions and development opportunities	Annual	No systematic unexplained disparity
Pay equity	Comparable-role compensation review	Annual	All material unexplained gaps investigated
Training	Completion by audience	Annual	≥90% overall first-cycle completion; 100% of hiring managers annually
R&I content	Projects completing relevance screening	Quarterly; annual summary	100% of new material R&I projects
Culture	Qualitative feedback and concerns	Annual	Actions recorded for recurring themes
Harassment and discrimination	Cases and response times, aggregated	Annual	100% handled under protocol; no retaliation
Publication	Annual public GEP summary	Annual	Published once per year

ANNEX B

Minimum R&I gender relevance screening

For each new material R&I, AI or user-facing software project, the project lead records brief answers to the questions below. This is a screening tool, not a requirement to force a gender dimension where none is scientifically or technically relevant. Completed screening records are held internally as project documentation.

1. Does the project affect people, users, creators, workers, audiences or other human stakeholders, directly or indirectly?
2. Is sex or gender plausibly relevant to needs, behaviour, safety, accessibility, language, representation, model performance or outcomes?
3. Are datasets, research samples, prompts, labels, test cases or evaluation groups sufficiently representative for the intended use?
4. Could the system reproduce stereotypes, exclusion, harassment or differential quality across genders?

5. What evaluation or review will detect material bias or performance differences?
6. What mitigation is required, who owns it, and how will residual risk be documented?
7. If gender is assessed as not relevant, what is the short justification, and when should the decision be revisited?

REFERENCE FRAMEWORK

Standards this Plan follows

- European Commission, Gender equality in research and innovation — Horizon Europe policy and guidance (current 2026–2027 framework).
- European Commission, Horizon Europe Work Programme 2026–2027 and General Annexes — gender equality plans and gender mainstreaming provisions.
- European Commission, Gender Equality Plans (GEPs) — Frequently Asked Questions and implementation guidance.
- Regulation (EU) 2016/679 (General Data Protection Regulation), in particular the principles of data minimisation, purpose limitation and confidentiality.
- Applicable national employment, equality, anti-harassment and data-protection legislation in the jurisdictions in which POMS Cloud Ltd. operates.

CONTACT

Questions, feedback and concerns

Good-faith feedback is essential to the continuous improvement of this Plan. Employees, applicants, partners and other stakeholders may contact the Gender Equality Plan Coordinator with questions about the Plan, requests for information, or concerns about conduct connected to the company's work.

- **Gender Equality Plan Coordinator** — [EMAIL ADDRESS]
- **Postal address** — POMS Cloud Ltd., [REGISTERED ADDRESS]

Correspondence is treated confidentially and shared only on a need-to-know basis, as described in Section 9. Employees may also use the internal reporting channels set out in the company's internal protocol.

This Plan is available on request in an accessible format. Previous versions are archived and available on request. This Plan is a corporate governance document; it does not replace individual employment rights, contractual terms, statutory procedures or professional legal advice where required.