Equality Plan Ico Group





19/12/2024 Approval by the Negotiating Committee of the Third Equality Plan



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1. Foreword

The Spanish Official Credit Institute (Instituto de Crédito Oficial or ICO) is a state-owned enterprise (Spanish acronym: EPE) attached to the Ministry of Economy, Commerce and Business, through the State Secretariat for the Economy and Business Affairs.

In legal terms, it is a credit institution and is considered a State Financial Agency, with its own legal personality, assets and treasury, as well as management autonomy to fulfil its purposes.

The ICO is a public bank and is governed by the regulations contained in the Sixth Additional Provision of Royal Decree Act 12/1995 of 28 December on urgent measures in budgetary, tax and financial matters and subsequent amendments, by Royal Decree 706/1999 of 30 April adapting the Official Credit Institute to Act 6/1997 of 14 April, on the organisation and functioning of the General State Administration and approving its By-laws.

Equal treatment and opportunities for men and women form a strategic principle of the Corporate and Human Resources Policy and a key area of action for the ICO, which is included both in its Sixth Collective Agreement (art. 49.bis) and in the general principles governing its Code of Conduct (art. 4).

In addition, company and employee representatives have confirmed their commitment to equal treatment and opportunities for men and women by negotiating and agreeing ICO's First and Second Equality Plans which, together with other documents such as the Remote Working Plan, the Digital Disconnection Policy and the Anti-Harassment Protocol, make up the current framework for integrating equality into ICO's management and structure.



The ICO incorporates equality practices in selection, promotion, salary policy, training, working and employment conditions, occupational health, organisation of working time and work-life balance, as set out in the latest monitoring report of the Second Equality Plan, which was approved on 17 December 2019.

Furthermore, these practices have an impact on areas such as advertising, image, communication, language and customer information at the ICO. This is demonstrated by the fact that the Institute uses non-sexist language and images, utilises materials without gender connotations or stereotypes, collaborates with Public Administrations by publicising institutional campaigns related to equality, encourages the participation of its employees in informative activities, promotes inclusion as a tiebreaker criterion in contracting specifications and disseminates the ICO Equality Plan to third parties outside the Institute.

ICO's commitment to the well-being of its employees is certified through the Family-Responsible Company seal awarded and renewed by the Masfamilia Foundation since 2014.

This Third Equality Plan is designed to enable us to continue to move forward, building on the results obtained and establishing new commitments, in a spirit of continuous improvement and excellence.



2. Signatories to the equality plan

This Equality Plan is signed by the Negotiating Committee constituted on 14 November 2023, made up of three representatives of the company management and three representatives of the workers, with equal representation on both sides, recognising each other's legitimacy to carry out the negotiation.

The three members of this negotiating committee representing the company's management are as follows: Ms María Dolores Martelo Núñez, Eduardo Rodríguez Álvarez and Alfonso Sáenz Ramos.

The three members of this special negotiating body representing the workers are as follows: Ms Ana Armesto Lázaro (C.G.T.), Lourdes Peregrina Anguita (C.S.I.F.) and Francisco Antequera Jareño (U.G.T.)

The preliminary work of analysis and diagnosis has been carried out within the framework of collaboration, work and information exchange of the Negotiating Committee of the Third Equality Plan. Agreement has been reached on this Equality Plan, which has been unanimously signed by all the parties present in the Committee.

3. Personal, territorial and temporal scope

The Equality Plan will apply to the entire ICO workforce, taking effect in the territory where its headquarters are located, in Madrid.

The Equality Plan will enter into force on 1 January 2025 and will end on 31 December 2028.

Furthermore, and in accordance with Article 55.3 of Act 4/2023, of 28 February, for the real and effective equality of transgender people and for the guarantee of the rights of LGBTQ people, this equality plan includes transgender people and, therefore, the measures aimed at women will be equally applicable to transgender women.



4. Diagnostic report

A preliminary diagnosis has been carried out to identify the extent to which equal treatment and opportunities for women and men are integrated into ICO's general management system and structure, and to obtain the precise information needed to design and establish the evaluable measures to be adopted, the priority in their application and the criteria necessary to evaluate compliance.

The diagnosis was carried out using the applicable legal framework as a reference guide:

- Organic Act 3/2007, of 22 March, for the effective equality of women and men.
- Royal Legislative Decree 2/2015, of 23 October, approving the revised text of the Workers' Statute Law.
- Royal Decree-Act 6/2019, of 1 March, on urgent measures to guarantee equal treatment and opportunities between women and men in employment and occupation.
- Royal Decree 901/2020 of 13 October regulating equality plans and their registration and amending Royal Decree 713/2010 of 28 May on the registration and deposit of collective bargaining agreements.
- Royal Decree 902/2020 of 13 October on equal pay for women and men.



This Diagnosis has been negotiated within the Negotiating Committee of the Third Equality Plan. The areas analysed were:

- Quantitative analysis of the workforce according to different parameters (gender, age, relationship, type of employment relationship and contract, type of working day, seniority, organisational unit, hierarchical level, position held and family responsibilities, level of training, promotion, appointments of staff outside the collective agreement, composition of the legal representation of workers and management bodies, and people with disabilities)
- Selection and recruitment processes
- Training
- Career advancement
- Remuneration policy
- Working conditions
- Co-responsible exercise of the rights to personal, family and working life
- Under-representation of women
- Prevention of sexual and gender-based harassment
- Information and awareness-raising
- Prevention of gender-based violence

4.1. Quantitative analysis summary

A **quantitative analysis** of the workforce at the Spanish Official Credit Institute (ICO) as of 31 December 2023 reveals that, out of a total of 370 employees, 62% are women and 38% are men. The average age of the workforce is 48 years for women and 47 years for men. The Institute's age pyramid shows that women are in the majority in all age groups. The average length of service of the workforce is 17 years for women and 14 years for men. In all seniority brackets, there is a majority of women. A breakdown by contract type shows that there is a majority of women on both permanent contracts and the various types of temporary contracts. In addition, they outnumber men at both the contractual and non-contractual levels, and they are also in the majority in promotions. The legal representation of employees is balanced, and the General Council of the ICO has an equal number of men and women.

In conclusion, the ICO has achieved a balanced and fair representation between men and women in most of the aspects assessed. The slight feminisation of the workforce at all levels reflects an inclusive working environment and a strong commitment to gender equality, highlighting the success of its diversity and inclusion policies.

4.2. Key findings from the diagnosis

The diagnosis carried out shows the solid integration of equality in the management and structure of the ICO, which has a healthy organisational culture. The ICO guarantees equal conditions in selection, recruitment, training, promotion, remuneration and working conditions. It also avoids under-representation of women, promotes the reconciliation of personal, family and working life, and establishes measures to prevent sexual and gender-based harassment.

General Terms and Conditions

The ICO is a cohesive organisation, with a defined structure and hierarchy and a solid track record of more than 50 years. It has a single work centre and a strong focus on social and environmental impact activities. Equality of treatment and opportunity is a strategic principle of action and an essential component of its internal and external expression. The Negotiating Committee of the Third Equality Plan has equal representation, experience, training in the field and support from the Institute's management. The data analysed reveal a female-dominated, highly qualified workforce, with an average length of service of more than 15 years and mostly with permanent contracts.

The current general conditions in the Institute are adequate to foster a space for equality, with **no significant incidences**. However, some challenges are inevitable, especially in the medium and long term. In the next 15 years, ICO will face a strong generational replacement, as 180 of its 370 employees are aged 51 or older. In addition to the need to replace 49% of its professionals, it will also be necessary to fill the vacancies they leave in leadership positions, which will change the command structure. This regeneration process will have to be implemented in a dynamic and constantly changing environment, which, given the Institute's regulatory and budgetary constraints, will have to be addressed in advance.

⁸ In terms of **priority areas and proposals for action**, the Institute has proven to be a strong advocate for equality. It now faces the challenge of continuing on the path it has travelled, assuring its staff of the permanence of the results achieved and exploring new ways to move forward in its future.

Professional classification

The professional classification established in Section Three of the Institute's Collective Agreement defines a clear and precise job structure, differentiating between the Technical Group and the Administrative Group. In addition, it provides for a system of free designation for non-agreement posts, allowing for flexible and adaptive management. This structure ensures an efficient and orderly organisation of human resources, providing sufficient guarantees of access for both sexes to each of the posts, under strict conditions of equality.

As a result of the analysis, no **incidents** have been detected in the area of equality and non-discrimination, so there are **no priority areas or proposals for action** to be addressed in response to this diagnosis.

Selection and recruitment

When advertising job vacancies, the Institute guarantees the principles of free competition, equality, merit, ability and openness, selecting the best professionals regardless of their origin, status or personal or social circumstances. It ensures transparency and agility in the selection processes, including openly appointed positions, and promotes a balanced presence in its selection boards. It uses inclusive language and takes measures to ensure that applicants who are pregnant or on parental leave can participate on equal terms. It also promotes equality in recruitment and demonstrates its commitment to equal treatment and opportunities in recruitment, interviews and welcome programmes. Taking into account these aspects, **no incidents have been detected**.

In terms of **areas for action** in this area, there is a need for continuous training and awareness-raising for members of selection boards in order to avoid unconscious bias.

Training

ICO offers its staff quality training that facilitates the development of personal skills and professional competencies. This translates into higher value work and a better matching of posts to the present and future needs of the Institute. There is a balance between the number of people per gender and the hours of training received. The training catalogue is wide and varied. Training providers have been asked to take into account the gender perspective in the content of their training. Gender-disaggregated training data is also collected and training is offered to people on leave for childbirth, childcare, breastfeeding or leave of absence to care for children or family members. In addition, staff are trained in equality and digital disconnection, promoting training within working hours. These good practices are reflected in the Training Plan and Policy, which provides greater assurance to staff. Taking into account these aspects, **no incidents have been detected**.

Considering that in recent years there has been a rapid expansion of digital and collaborative work and that this can have a very positive impact on family reconciliation, **the priority areas** and **proposals for action** should be aimed at continuing to train staff in the new tools for communication and collaborative work in the digital environment, following on from the latest training actions carried out in this respect. In addition, the focus should be on equality training for new recruits, taking into account the generational replacement that will take place in the ICO in the coming years.

Promotion

Employees of the Institute are entitled to career advancement through the promotion schemes set out in the Agreement, the financial viability of which is subject to the applicable budgetary framework. The established promotion regime is complemented by a policy of filling non-agreement posts through free appointment. ICO also encourages the functional mobility of its staff by allowing them to change jobs within the organisation.

The data presented show an equal representation of men and women in middle and senior management, which shows that the ICO correctly incorporates the criteria of equality, merit and ability in professional promotion, with no **incidents** to be corrected within the framework of the Third Equality Plan.

In terms of **areas of action** in this field, the continuous training and awareness-raising of evaluators is proposed to avoid the appearance of unconscious biases.

Remuneration

The analysis of ICO salaries shows that there are no significant differences between men and women at the different salary levels. The pay audit confirms that the pay system complies with the principle of equal pay for work of equal value. The differences observed are due to objective factors, such as the perception of functional complements or the fulfilment of objectives, and not to gender bias. ICO promotes pay transparency through the pay audit, the job evaluation system, the professional classification and the applicable collective bargaining agreement, guaranteeing employees' right to information.

In conclusion, there are no **significant differences**, with a total pay gap of -1.7% in favour of women. The data therefore amply meet the objective intended by the legislator.

Proposals and priority areas for action should be directed towards measures to promote the proper monitoring of current practices, as well as the continued promotion of transparency.



Working conditions

The Institute has its own collective agreement which establishes important improvements in working conditions, such as a shorter working day than the maximum legally established, a winter and summer timetable with flexible start and finish times, days off, additional paid and unpaid leave and other benefits such as teleworking. It also provides its staff with job stability, a comprehensive benefits package, variable remuneration and numerous actions to promote work-life balance. ICO's commitment to the well-being of its employees has been regularly certified through the Family-Responsible Company seal awarded by the Masfamilia Foundation since 2014.

No **incidents** have been detected in the working conditions that exceed those that may result from carrying out any activity of a similar nature in companies of a similar size and hierarchy, which adopt practices to promote equality and recognition of the rights of their personnel. However, the ICO is aware of the effects that work can have on health, even in favourable conditions and environments, and therefore **priority areas and proposals for action** should be aimed at reducing them.

Exercising the rights of personal, family and working life

The Institute promotes a work environment that allows its professionals to balance the fulfilment of their work responsibilities with the needs of their personal and family life. The wide range of work-life balance measures, together with the particularities of the Institute, which concentrates its activities in a single location and with homogeneous working hours, allows the staff to maintain a fixed residence, stable working hours and work-life balance conditions, so that corporate prerogatives have a minimal impact on their care responsibilities.

The Institute has the tools, the commitment and the right organisational climate to enable people to exercise their rights in their personal, family and working life. However, equality in the recognition of the right does not translate into equality in its exercise by both sexes, despite the strong commitment of the Institute. Thus, the data presented seem to show the existence of a greater involvement of women in care work, reflecting a social reality.

The **incidences** detected arise from the greater use by ICO women of leave and leave of absence to care for family members, especially children and the elderly. **Priority areas and proposals for action** should focus on promoting balance in the exercise of these rights, while respecting individual will.



Under-representation of women

ICO has 62% female staff, with women predominating in all age groups, seniority, business units, professional groups and middle management. On the board of directors, representation is equal 50/50, excluding the position of chairperson.

The data reflect a female-dominated workforce and the correct application of the principles of equal treatment and equal opportunities.



Therefore, no significant **incidences** requiring immediate **proposals** can be identified. **Priority areas for action** should therefore be geared towards analysing data for action in case systemic deviations arise.

Prevention of sexual and gender-based harassment

The ICO has an action protocol against harassment applicable to all staff and available for consultation in the internal regulations section, drawn up in accordance with the principles established in the Spanish Constitution, the Workers' Statute and Organic Act 3/2007, of 22 March, for the effective equality of women and men. The protocol contains a description of the procedures and measures for awareness-raising, prevention, detection and action against sexual harassment and gender-based harassment, as well as their accessibility. The protocol sets out a statement of basic principles of action, defines sexual and gender-based harassment, includes the procedure for dealing with harassment, and identifies reactive measures and the disciplinary regime that may result from the resolution of a case.

As a result of the diagnosis, it has been determined that there are currently no **incidents** in the Institute's current system for preventing sexual and gender-based harassment. It has also been verified that the action protocol fulfils the intended purpose. In terms of **priority areas and proposals for action**, the Institute should continue with information and awareness-raising actions aimed at promoting a culture of respect and facilitating channels of response to staff.

These conclusions consolidate the Institute as an entity committed to equality, conciliation, respect and the guarantee of its staff's rights, and at the same time, they allow us to identify possible areas of development in which we can continue to make progress.



4.3. Remuneration audit process outcome

In accordance with article 7 of Royal Decree 902/2020 of 13 October on equal pay for women and men, the purpose of the pay audit is to obtain the necessary information to verify whether the company's remuneration system, in a transversal and comprehensive manner, complies with the effective application of the principle of equality between women and men in terms of remuneration. It should also make it possible to identify needs to avoid, correct and prevent obstacles and difficulties that exist or may arise in order to guarantee equal pay, and to ensure transparency and monitoring of the pay system.

Prior to the performance of the remuneration audit, the company has drawn up the remuneration register, in accordance with the provisions of articles 5 and 6 of Royal Decree 902/2020 of 13 October. It has also carried out the job evaluation in accordance with the provisions of articles 4 and 8.1 of Royal Decree 902/2020 of 13 October.

The **Job Evaluation** has been carried out in accordance with RD 902/2020, using the Job Evaluation tool provided by the Ministries of Labour and Equality combined with the Guide for the use of the tool itself, in order to ensure the correct methodology and guarantee the result. The results of this assessment yields scoring data whose order validates the job system used for the ICO's salary register, based on the professional categories in the collective agreement and outside the collective agreement and the pay levels established in the collective agreement. This result shows that the remuneration received by the different professional groups and levels at ICO is clearly related to the value they contribute to the organisation, with the highest-scoring posts receiving higher remuneration and the lowest-scoring posts receiving lower, thus complying with the criteria established in article 4 of Royal Decree 902/2020, of 13 October, on equal pay for men and women.

For the **Remuneration Register**, the scheme defined in articles 5 and 6 of Royal Decree 902/2020 of 13 October has been followed. The pay register reflects the arithmetic means and medians of identified job groupings of equal value in the company, broken down by gender and disaggregated by including the average values of salaries, salary supplements and non-wage payments of the workforce. It does not include the justification referred to in Article 28.3 of the Workers' Statute, as there are no deviations in the arithmetic mean or median of the total remuneration in the company of workers of one sex with respect to the other of at least twenty-five per cent.



The data in the wage register is available for access through the legal representation of workers in the company, as provided for in article 28 of the Workers' Statute (RD 2/2015).

The analysis of the **Remuneration Audit** has been carried out within the framework of the diagnosis of the Third Equality Plan, with which it shares validity. For this purpose, both ex ante and procedural aspects were evaluated, as well as data relating to job evaluation and the pay register, and other factors that could lead to a pay gap.

The result shows that there is no significant pay gap between men and women at the different pay levels, confirming that the pay system complies with the principle of equal pay for work of equal value, with a total pay gap of -1.7% in favour of women.

For contract staff, there are no significant differences in basic pay between men and women. Variations in allowances and fringe benefits are due to objective factors and not to gender bias.

For middle management, pay differentials are minimal and not significant, with a slight variation in favour of men in area management and women in departmental management.

In the case of managerial staff, remuneration is regulated by rules guaranteeing equality, and the differences observed are in any case due to the particularities of the post.

As for the presidency, a gender analysis could not be carried out due to the uniqueness of the position.

In addition, the classification and promotion systems, the number of promotions in recent years, appointments, training, working conditions and the co-responsible exercise of personal and family life rights were analysed, as well as other factors such as the under-representation of women. As a result, no factors have been identified that trigger gender-based pay differentials, all of which are carried out in accordance with strict equality criteria.

In conclusion, the data broadly meet the objective intended by the legislator, and it is not necessary to establish a specific action plan to ensure the application of the principle of equal pay.

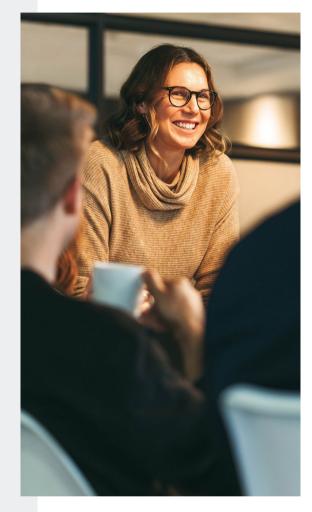


The Spanish Official Credit Institute (ICO) is a state-owned enterprise (E.P.E.) and is subject to the rules that apply to the institutional public sector, specifically, what is regulated in the General State Budget Law, and to strict control of its wage bill by the Ministry of Finance through the Secretariat of State for Budgets and Expenditure.

5. Equality plan objectives

In coherence with the results of the diagnosis, the present Equality Plan has the following general objectives:

- To continue to make progress in the area of equality, reinforcing the results obtained with previous Equality Plans and establishing new commitments, in a spirit of improvement and continuous improvement.
- To ensure the effective application of the principle of equal treatment between men and women and the absence of gender discrimination within the company.
- To promote the reconciliation of personal, family and working life, ensuring the absence of discrimination due to maternity, paternity or the assumption of family obligations.
- To provide a working environment free of harassment based on sex and sexual harassment.
- To generate a violence-free work environment and raise awareness among staff about zero tolerance of violence against women.
- To promote a healthy, safe and well-being working environment that allows all employees to carry out their work in the best physical, psychological and social conditions.
- To promote an organisational culture that fosters gender equality and respect for diversity.
- To consolidate and guarantee equal treatment and opportunities in access to public employment.
- To ensure that the company's image and communication (internal and external) is inclusive and non-sexist.
- To promote gender equality in the value chain and external suppliers, and support external equality initiatives.



These general objectives are specified in the lines of action, measures and specific objectives indicated in point 6 of this Equality Plan.

6. Equality measures

The achievement of the above objectives will be implemented through the following set of measures.

Theme 1	GENERAL TERMS AND CONDITIONS
Measure 1	Incorporate equality compliance clauses in public procurement with the ICO.
Description	Include in the contracting specifications compliance with the regulations on equality plans for tende- ring companies and their validity for the duration of the contract.
Objectives	 To commit the companies awarded public contracts signed with the ICO to incorporate respect for real equality measures between women and men. That the clause indicated in the measure be included in all contracting specifications in which companies have a legal obligation to comply with the equality plan.
Responsible party	Human Resources and CSR Dept.
Target audience	Companies bidding in ICO public procurement processes.
Associated Resources	Directorate of Legal Advice.Organisation Area.
Timeline	Implementation during the first year of the Plan.Continuous monitoring throughout the life of the Plan.
Priority	High.
Indicators	Inclusion of the clause indicated in the measure in all contracting specifications in which companies have a legal obligation to comply with the equality plan.



Theme 2 SELECTION AND RECRUITMENT Continue to promote parity in the selection bodies, with special emphasis on the most Measure 2 representative positions (presidency and secretariat). Description Verify annually that parity is complied with in accordance with applicable legislation. To consolidate and guarantee equal treatment and opportunities in access to public employment. **Objectives** Responsible Body managing the selection process. party Target audience Persons who sit on selection boards in selection processes. Associated Human Resources and CSR Department. Resources Timeline Continuous, throughout the life of the Equality Plan. Medium. Priority • Percentage of women present in the composition of the selection bodies of all the selective processes carried out during the year. Indicators • Compliance with the percentage in accordance with the applicable regulations. Take reasonable and appropriate measures to ensure that applicants who are pregnant Measure 3 or on parental leave are able to complete all stages of the selection procedure. The Selection Body may assess the circumstances of pregnant or maternity applicants and may take Description appropriate measures to ensure equal treatment and opportunities for applicants. **Objectives** To consolidate and guarantee equal treatment and opportunities in access to public employment. Responsible Selection body. party Target audience Candidates who are pregnant or on parental leave. Associated Human Resources and CSR Department. Resources Timeline Continuous, throughout the life of the Equality Plan. Priority Medium. • Number of applications that comply with the terms of the call / Number of adaptations made that comply with the terms of the call =100%. Indicators · Adoption of concrete measures on a case-by-case basis.

Theme 3	TRAINING, INFORMATION AND AWARENESS-RAISING
Measure 4	Training and awareness-raising on equality for newly hired employees.
Description	Train and raise awareness of equality issues among new ICO employees.
Objectives	To ensure that all employees joining the ICO are aware of the equality content.
Responsible party	Human Resources and CSR Department.
Target audience	Newly recruited ICO employees.
Associated Resources	External equality advisors/trainers.
Timeline	Continuous, for the entire duration of the Equality Plan. As new employees join ICO, within three months.
Priority	Medium.
Indicators	Participation of 100% of newly hired employees in some of the training actions carried out in face-to-face or distance learning format.
Maaaaaa T	Decide the new excitations of leaves as he could use
Measure 5 Description	Promote the non-sexist use of language by employees. Promote the non-sexist use of language by employees, especially those in charge of internal and external communication, through the dissemination of official guidelines for the non-sexist use of language and the development of recommendations for the non-sexist use of language.
Objectives	To contribute to the elimination of gender inequality, eradicate stereotypes and make women visible, ensuring that the organisation's communications respect the principle of equality and are inclusive.
Responsible party	 HR and CSR Department. Communication Directorate.
Target audience	All staff, in particular communication staff and all those areas that regularly issue internal and exter- nal communications.
Associated Resources	 Equality experts and/or linguists. Organisational Area.

Timeline	 First (2025) and second year (2026) of validity: publication of a guide on non-sexist language produced by a public authority (Ministry, Public University, European Union, Autonomous Community of Madrid, City Council of Madrid, etc.). Third (2029) and fourth year (2028): preparation and publication of an information leaflet, instruction or internal ICO recommendation. Incorporation of all the information in the equality space on the ICO intranet as the actions planned during the Plan are carried out.
Priority	Medium.
Indicators	 First (2025) and second (2026) year of validity: Publication of a manual/guide in the Equality space on the ICO intranet (Yes/No). Third (2027) and fourth (2028) year of validity: Maintenance and periodic revision of the manual/guide throughout the life of the Plan, with the possibility of replacing the published guide with a more up-to-date one, at the discretion of those responsible for implementation (2025-2028). Elaboration of ICO's own information leaflet, instruction or internal recommendation (Yes / No) Publication in the equality space on the ICO intranet (Yes / No).
Measure 6	Ensuring access to training for the entire workforce.
Description	Monitoring of the action protocol so that workers on childbirth and childcare leave, breastfeeding leave or leave of absence to care for children or family members can express their wish to take part in training courses, so that absence is not a barrier to professional progress.
Objectives	To access to training for all ICO staff, whatever their status, without any discrimination or inequality whatsoever.
Responsible party	Human Resources and CSR Department.
Target audience	Workers on childbirth and childcare leave, breastfeeding or parental leave.
Associated Resources	Information systems.
Timeline	Continuous, throughout the duration of the Equality Plan.
Priority	Medium.
Indicators	 Number of people who have expressed their wish to continue or start training actions during childbirth and childcare leave, breastfeeding and parental leave. Number of training actions carried out by this group.

Measure 7	Ensure awareness of the Training Plan and its training actions, regardless of professional group, category, position and gender.
Description	Train and raise awareness among ICO staff, especially managers and executives, on equal treatment and opportunities, co-responsibility, the use of conciliation measures, prevention of sexual and gender-based harassment, gender-based violence, digital disconnection and the appropriate use of information technologies.
Objectives	 To ensure that all ICO staff are aware of the content on equality, work-life balance, prevention of sexual and gender-based harassment, prevention of gender-based violence and digital disconnection. To contribute to ensuring that people with responsibility in the organisation are aware of and actively participate in the dissemination and knowledge of content on equality and work-life balance, prevention of sexual and gender-based harassment, prevention of gender-based violence and digital disconnection for their teams.
Responsible party	Human Resources and CSR Department.
Target audience	All staff.
Associated Resources	Persons with responsibility for teams.
Timeline	Continuous, for the entire duration of the Equality Plan.
Priority	Medium.
Indicators	 Number of awareness-raising actions carried out. Number of training actions by training modality (face-to-face/distance). Number of participants in these actions disaggregated by gender in face-to-face and distance mode. Participation of at least 95% of middle and senior management in one of the training or awareness-raising actions (duration of 1 hour) carried out during the duration of the equality plan. For this purpose, the group of middle and senior managers who have held the post during the term of the plan shall be taken into account.



Theme 4	PROMOTION
Measure 8	Ensure that the principle of equality and non-discrimination is respected in any promo- tion or economic improvement.
Description	Guarantee that in any promotion or economic improvement, the principle of equality and non-discri- mination is respected, and that any discrimination based on sex or on the enjoyment of any reconci- liation measure or childbirth and childcare leave is absolutely forbidden.
Objectives	To ensure equal treatment and equal opportunities in promotions, using objective and transparent criteria.
Responsible party	Human Resources and CSR Department.
Target audience	All staff.
Associated Resources	Human Capital and CSR Departments.
Timeline	Continuous, for the entire duration of the Equality Plan.
Priority	Medium.
Indicators	 Number of people promoted by professional category and gender. Number and use of work-life balance measures by promoted employees.
Measure 9	Ensure equal treatment and equal opportunities in promotions, using objective and transparent criteria.
Description	Have statistical data available and regularly monitor the proportion of women and men in positions of responsibility. This information shall be communicated annually to both the Works Council and the CODIR, with express mention of any deviation from the parity percentages.
Objectives	To identify deviations in the representation of women and men in management and middle manage- ment positions in general and, where appropriate, propose corrective measures if under-represen- tation of women is observed with respect to the parity percentages.
Responsible party	Human Resources and CSR Department.
Target audience	Women and men in positions of responsibility.
Associated Resources	 Works Council. CODIR. Labour Relations Area.
Timeline	Continuous, for the entire duration of the Equality Plan.
Priority	Medium.

Theme 5	REMUNERATION
Measure 10	Monitor the implementation of the pay policy to ensure equal pay for work of equal value.
Description	Carry out an analysis of the salary structure of the different professional groups in order to prevent and, if necessary, detect any significant differences and, if necessary, analyse the causes of these differences.
Objectives	To detect, correct and eliminate any wage discrimination based on sex.
Responsible party	Human Resources and CSR Department.
Target audience	All staff.
Associated Resources	Joint Committee.Works Council.
Timeline	Continuous, for the entire duration of the Equality Plan.
Priority	Medium High.
Indicators	Preparation of the salary register, at year-end.Communication to the Works Council within the Joint Committee.
Theme 6	WORKING CONDITIONS
Measure 11	Maintain the Family-Responsible Company (EFR) Distinction, awarded by the Másfamilia Foundation, for being a company committed to reconciling the work and personal lives of its employees.
Description	Implement and put into practice the actions and measures necessary to obtain the renewal of the EFR certificate, which will be submitted to an independent external audit for compliance and renewal by the Masfamilia Foundation.
Objectives	To guarantee the exercise of work-life balance rights, informing about them and making them acces- sible to the entire workforce. To encourage the use of co-responsibility measures among men in the workforce.
Responsible party	Human Resources and CSR Department.
Target audience	All staff.
Associated Resources	Human Capital and CSR Departments.

Timeline	Continuous, for the entire duration of the Equality Plan.
Priority	Medium-High.
Indicators	 Execution of the renovation process, implementing/updating the necessary measures for renovation. Obtaining the renewal of the EFR mark.

Measure 12	Promoting healthy living, safety and well-being in the work environment.
Description	Train and raise awareness among ICO staff on aspects related to safety, health and well-being in the workplace.
Objectives	To achieve a healthy working environment and well-being that allows all employees to carry out their work in the best physical, psychological and social conditions. To achieve an optimal level of occupational safety beyond mere compliance with occupational risk prevention regulations.
Responsible party	Human Resources and CSR Department.
Target audience	All staff.
Associated Resources	Labour Relations Area.
Timeline	Throughout the life of the Plan.
Priority	Medium-High.
Indicators	 Number of awareness-raising actions carried out, with a minimum of two per year. Number of training actions, with a minimum of two per year. Number of participants in training actions broken down by gender.



Theme 7	EXERCISING THE RIGHTS TO PERSONAL, FAMILY AND WORKING LIFE
Measure 13	Create and maintain a space for equality on the corporate intranet.
Description	Create, maintain and update on the intranet a specific virtual space for equality, work-life balance, co-responsibility, prevention of gender-based violence and harassment, dissemination of campaigns, etc.
Objectives	 To contribute to giving greater visibility and value to information and measures relating to equality, conciliation, co-responsibility, prevention of gender violence and prevention of harassment. To facilitate access for all staff to all corporate equality content.
Responsible party	Human Resources and CSR Department.
Target audience	All staff.
Associated Resources	Systems Directorate.Works Council.
Timeline	Continuous, throughout the lifetime of the Equality Plan.
Priority	High.
Indicators	 In the first year of validity (2025): Creating a space for equality. Dissemination of the space through internal communication channels. Updated content on basic equality legislation and procedures in force. Throughout the duration of the Plan since the implementation of the equality area: Number of new contents and updates published each year.



Measure 14	Preference in the enjoyment of holidays during non-teaching periods for persons with children under 12 years of age.
Description	Ensure that persons with children under 12 years of age are allowed preferential use of holidays and private days during non-teaching periods. In the event that the holiday period is fixed by agree- ment or judicial decision, try to ensure that they are allowed preferential enjoyment of the holiday period in the month assigned to their children by said agreement or decision.
Objectives	To guarantee the exercise of work-life balance rights, informing about them and making them accessible to the entire workforce.
Responsible party	Human Resources and CSR Department.
Target audience	All staff.
Associated Resources	Team leaders.
Timeline	Continuous, throughout the lifetime of the Equality Plan.
Priority	Medium.
Indicators	Incorporation of the measure in the equality area of the corporate intranet.

Theme 8 PREVENTION OF SEXUAL AND GENDER-BASED HARASSMENT

Measure 15	Raise awareness of equal treatment, prevention of gender-based violence and preven- tion of harassment among ICO staff by publishing institutional messages and campaigns through the different internal communication channels and mechanisms.
Description	Publish institutional messages and campaigns related to equality, co-responsibility, prevention of harassment at work and gender-based harassment and prevention of gender-based violence, with at least one campaign published during Women's Week (8 March) and another during the week of the International Day for the Elimination of Violence against Women (25 November).
Objectives	To generate a violence-free work environment and raise awareness among staff about zero tolerance of violence against women.
Responsible party	Human Resources and CSR Department.
Target audience	All staff.
Associated Resources	Communication Directorate.
Timeline	Continuous, throughout the lifetime of the Equality Plan.
Priority	Medium High.
Indicators	Number of campaigns disseminated with a minimum of two per year.

7. Implementation and monitoring

This Plan shall apply from the day of its entry into force. A dissemination campaign will be carried out to inform all staff through various internal channels and will be published on the institutional website for the information of third parties outside the Institute. Subsequently, those responsible for each measure will be informed of the objectives to be met, the deadlines set, as well as other relevant factors such as priority, associated resources and indicators.

The Equality Plan will be **monitored** by the Joint Committee where improvements will be proposed and its implementation will be continuously monitored, as provided for in article 49.3 Bis of the Sixth Collective Agreement of the ICO.

This Joint Committee is regulated in Article 3 of the Sixth Collective Agreement of ICO. It is made up of three representatives of the Institute, three representatives of the employees and a secretary who will be appointed by the ICO from among the members of the Committee or an ICO employee who is not a member of the Committee. In the latter case, the Secretary shall have the right to speak but not to vote.



The Committee meets ordinarily every 3 months, without prejudice to

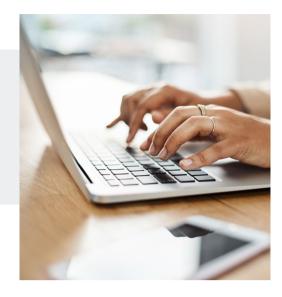
the fact that, for reasons of urgency, either of the parties may call a meeting in writing to the other, with at least 48 hours' notice. The notices of meeting shall detail the agenda for the meeting. The Secretary shall prepare the minutes of the meetings.



8. Evaluation and review

The **evaluation** will be carried out two years after the Plan has been in force, through the preparation of a monitoring report detailing the progress of the Plan through the percentage of compliance with the indicators established in the measurement sheets. This percentage will serve as a basis for the Joint Committee, as a monitoring body, to adjust, if necessary, the action plan to achieve the proposed objectives. It will also provide an insight into the progress made by the staff.

The Joint Committee may agree to review the measures if the results of the monitoring report indicate the need to reorient, improve, correct, intensify, mitigate or eliminate any of them, in order to achieve the proposed objectives.



In accordance with the Rules of Procedure of the Joint Committee, agreements shall be reached by majority vote. In the event of a tie vote, the interested party may, if he/she deems it appropriate, file a complaint with the labour courts.

9. Calendar of events

The calendar of actions is made up of the implementation schedules for each of the measure sheets.

10. Amendment procedure

The **amendment** of the Equality Plan will be carried out through a process of negotiation between the Institute and the Works Council, in compliance with the second paragraph of article 49. Bis. of the Sixth Collective Agreement.





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