

NUOVA ACCADEMIA DI BELLE ARTI

ENGLISH VERSION

GENDER EQUALITY PLAN

2024-2027

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1. INTRODUCTION

Gender equality is a fundamental principle of the European Union (EU), consistently reaffirmed in its documents which emphasize the need to turn this principle into reality through concrete actions. The United Nations' Sustainable Development Goal 5, part of the 2030 Agenda for Sustainable Development, is dedicated to gender equality and aims to eliminate all forms of discrimination and violence against women and girls, both in public and private. It promotes equal opportunities in all fields, including education, employment, and political participation. This goal is transversal to all 17 Sustainable Development Goals, indicating a global commitment to a fairer society.

The EU Gender Equality Strategy 2020-2025 highlighted the importance of a dual approach: specific measures for gender equality on one hand and the integration of a gender perspective in all EU decisions and sectors on the other.

In the field of research and innovation, the EU has emphasized the need to increase the presence of women in leadership positions, to support scientific careers with suitable working environments, and to integrate the gender dimension into the research topics to better respond to the requirements of European citizens.

Since 2021, it has been mandatory for organizations to adopt a Gender Equality Plan (GEP) to access funding under the Horizon Europe Program.

In line with European directives, Italy's National Recovery and Resilience Plan (PNRR) has developed a strategy to combat gender discrimination, articulated in five priorities: work, income, skills, time, and power. The PNRR aims to improve Italy's position in EIGE's Gender Equality Index by five points by 2026.

Respect for gender equality is a prerequisite for obtaining PNRR funding.

In summary, there are numerous incentives at the European and national levels for gender and inclusion policies. GEPs are planning and changing tools that help organizations set priorities, concrete objectives, and specific measures. The final aim is to improve gender equality in the teaching and research activities, starting from a meticulous assessment of the current situation.

This is the direction where NABA, Nuova Accademia di Belle Arti's Plan goes. After a careful auditing process for the drafting of the Plan, it is highlighted the state of the art in terms of gender equality within the organization. Based on the analysis of available data, Objectives and Actions have been arranged over three years, from September 2024 to August 2027.

2. TOP MANAGEMENT COMMITMENT

NABA's top management is fully aware of the importance of gender equity in all aspects of employee management and experience, as well as in business processes and career and development opportunities. NABA's top management has always been committed to reducing gender bias that may occur in hiring processes, career development, and remuneration, promoting instead a healthy work-life balance for both female and male genders. Gender equality is not considered an achievable result through sporadic and occasional actions, but rather a continuous process of development and training. Continuous commitment in this direction is not carried out by individual managers, but by the network formed by the entire NABA organization. This document represents a further step towards creating an inclusive culture, independent from the individual, but embodied in the very DNA of NABA.

Top management exercises its powers to promote, with a top-down approach, an inclusive organizational culture free from gender bias. At the same time, management is open to various contributions that may come from all staff and faculty to promote gender equality at NABA. Top management exercises its power, within the limits of the law and the will and instructions of NABA shareholders. Management will report to shareholders the importance of gender equity policies for the success and growth of both people and business quality within NABA.



3. NABA, NUOVA ACCADEMIA DI BELLE ARTI

NABA, as an active institution in the Education field, is a meeting and exchange point between the student body, teachers, and staff. Given its nature, as a center of encounter and production, it recognizes the importance of promoting an inclusive culture and equal opportunities. The quality of teaching and services provided by NABA strongly depends on the atmosphere and mutual respect among the main actors of NABA: the people. For this reason, the Academy actively promotes policies aimed at supporting talent and gender balance within its teams. With the adoption of this document, the Gender Equality Plan (GEP), NABA has equipped itself with a powerful tool to support wide-ranging investments aimed at structural change, without hypocrisy. Gender equality allows each member of the Academy to develop, reaching their maximum potential, overcoming cultural stereotypes and prejudices. The NABA Gender Equality Plan (GEP) focuses on strategic areas to promote gender equality and equal opportunities in all institutional sectors. The goal is to outline and define the specifics of the processes that will be implemented in the medium and long term. These processes will be integrated cyclically to comply with the principles established by the European Union, and following the sustainable development goal 5 (Gender Equality) promoted by the United Nations. NABA's GEP follows the stages recommended by the European Commission, including assessment, audit, and strategic planning. The plan addresses key thematic areas:

1. Achieving a better gender balance among staff

Increasing gender representation and participation at all levels of NABA. Implementing strategies to promote equal opportunities by gender, ensuring balanced gender representation in leadership roles, among faculty, and among students.

2. Awareness and fighting gender stereotypes

Increasing awareness and challenging gender stereotypes. Conducting workshops, seminars, and campaigns to educate the NABA community on gender stereotypes and promote a culture of inclusion and respect.

3. Preventing and combating sexual harassment and gender-based violence

Fighting sexual harassment and gender-based violence. Establishing clear policies, providing training, and creating a safe reporting mechanism to prevent and address instances of sexual harassment and violence within NABA.

4. Contributing to individual well-being through work-life balance measures

Improving individual well-being through work-life balance measures. Developing and implementing policies that support flexible working hours, parental leave, and other initiatives that help staff balance professional and personal life.

5. Finalizing a gender-sensitive data monitoring system

Implementing a gender-sensitive data monitoring system. Creating a comprehensive system to collect, analyze, and report gender-disaggregated data to monitor progress and inform future gender equality initiatives within NABA.

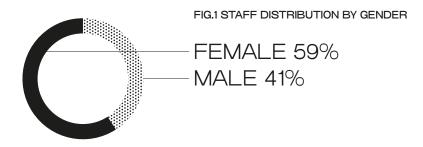
The Gender Equality Plan (GEP) team consists of three members from the Human Resources department, Project Management, and the Diversity and Inclusion Committee, already active at NABA since 2023. The gender equality plan presented in this document has two main purposes: to present the current state of the organization in terms of gender equality and to outline a strategy to further improve it over the next three years, identifying a clear set of objectives and appropriate actions.



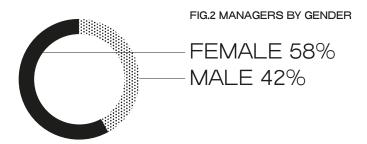
4. GENDER EQUALITY IN NABA

A. NABA PRESENTS ITSELF... THROUGH NUMBERS: NABA'S PEOPLE

As of March 2024, NABA had a staff of 252 individuals divided into 235 employees, 15 interns, and 2 project consultants. For all employees, except for directors, NABA adopts the ANINSEI national contract for secular schools. Executive roles are assumed under the national collective commerce contract. Responsibilities, autonomy, and managerial tasks vary depending on the position within the organization and are reflected in the contractual level defined for each employee. Currently, on an aggregate level, 59% of the workforce is female gender, and the remaining 41% is male gender.

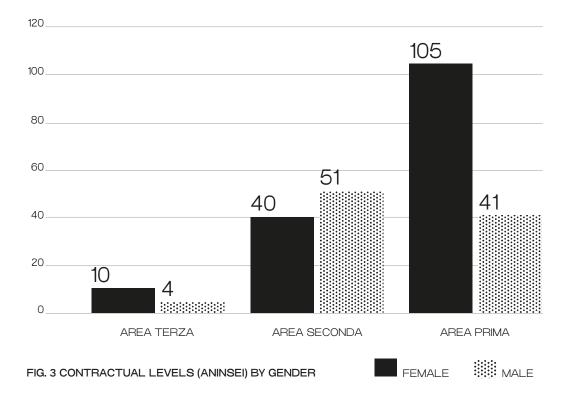


Regarding employees in managerial roles, NABA currently finds that 58% of managers are female gender, while 42% are male gender.

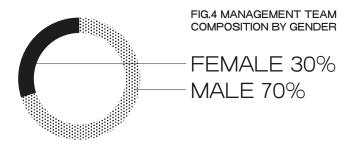


Considering the levels of the ANINSEI collective contract for NABA employees and disaggregating them by gender, the following graph [figure 3] shows the current situation. The First Area includes assistants, specialists, supervisors, and managers. The Second Area encompasses all academic staff, while the Third Area identifies managers with more seniority and responsibility.





Within its organization, NABA is driven by the Management Team, consisting of all personnel in top positions reporting directly to the Managing Director and Operations Director (Third Area and directors). The graph below examines only the Management Team, highlighting that 70% of it consists of male gender, while 30% of female gender. The percentage increase of women in managerial positions shows the awareness that gender-balanced teams outperform those dominated by a significant presence of a single gender.



The Management Team is aware of the importance of increasing the number of executive positions for female employees and intends to act in this direction. Currently, only 12.5% of staff hired as director is female, while the remaining 87.5% is male. NABA is controlled by the Board of Directors of Galileo Global Education Italia s.r.l (GGEI). GGEI's board consists of 78% male gender and 22% female gender.



As a controlled company, NABA has no influence or voice in the appointment of GGEI's board members; however, it makes shareholders aware of the importance of gender equity at all organizational levels.

NABA recognizes the importance of representing a fair gender mix in each work team. According to the McKinsey & Company research "Diversity Wins: How Inclusion Matters": companies with greater gender diversity are 25% more likely to generate higher profits. Gender diversity can promote a diversity of approaches and solutions and contribute to creating an inclusive environment. Currently, partly for historical reasons and macro sector trends, some teams still show a presence of a single gender exceeding 70%. NABA is committed to promoting the gender mix in each department.

DEPARTMENT	PREDOMINANT GENDER (OVER 70%)
Academic Coordinator	F
Admissions	F
Career Service	F
Communication & Web	F
Design	F
Digital Enrollment	F
Facilities	М
HR	F
Industry Relation	F
IT	М
Laboratory Design	М
Laboratory Media	М
Marketing Domestic	F
Media	М
Registration Office	F
Visual Art	М

FIG. 5 DEPARTMENTS WITH A SINGLE GENDER PRESENCE EXCEEDING 70%



B. NABA PRESENTS ITSELF... THROUGH NUMBERS: GENDER PAY GAP

NABA is committed to ensure a fair remuneration for all employees, fighting gender-based pay differences. The current situation at NABA shows an encouraging picture marked by a positive trend, where small differences exist in favor of both male and female genders, depending on the roles. In assistant, specialist, and managerial roles, on average, the male gender receives higher remuneration. On the other hand, in supervisor, senior manager, or head of roles, on average, the female gender receives a higher remuneration. The differences are, however, contained within a few hundred gross euros per year (as shown in figure 6), confirming that NABA operates in favor of a fair remuneration environment. However, NABA is committed to further reducing the gap and will work towards achieving a perfect balance between different genders' salaries. The GEP's goal is to maintain the achieved result, to improve it, and to ensure it for the future.

ROLE	DELTA (F-M) ON AVERAGE RAL PER GENDER
Assistant (classi IV(a)+VI(a))	-141,6 €
Specialist (classi IV(c)+VI(b))	-342 €
Supervisor (IV(d)+VII(a)(Iow)+VI(c))	665,1 €
Manager (classi V+VII(a)(high)+VII(b))	-389,6 €
Senior Manager/Head of (classi VII(c)+VIII(a)+VIII(b)	1467,1 €

FIG. 6 GENDER PAY GAP CALCULATED ON THE AVERAGE GROSS ANNUAL SALARY AND DIVIDED BY ROLE

C. WORK-LIFE BALANCE

Work-life balance has always been a fundamental factor in NABA's policies and decisions related to its people. Requests to reduce working hours from full-time to part-time have often been accepted, and adjustments to working hours have been agreed upon (where possible) with all employees who requested it. Additionally, all employees (if their job function allows) can work remotely up to 60 days a year. The number of available remote working days has increased from 48 to 60 in the past year. This demonstrates NABA's commitment to foster the right balance between private life and working time. Particular attention has been paid to absences due to parental leave, ensuring that childcare is compatible with workload management. The possibility of long absences from work due to maternity or paternity leave has never been a factor in hiring or promotion decisions. On the contrary, the organization has sought to accommodate its employees' needs during and after pregnancies. Furthermore, replacements for parental leave are always managed as a strictly temporary agreement, ensuring that employees on leave can resume their activities and roles within the organization upon their return. NABA has 6 employees benefiting from Law 104/92. Among them, 4 are female, and 2 are male. On the other hand, there are 14 employees with legally protected status in NABA: 10 are female, and 4 are male. NABA is committed to providing all necessary support to employees with legally protected status to allow them to express their potential.



D. D&I COMMISSION

The D&I Commission was established in 2023 with the aim of proposing initiatives to promote staff training, faculty, and the student community on diversity, equity, and inclusion issues. The Commission is currently composed of seven members, employed at NABA Milan and Rome, coming from various departments, including Academic Secretariat, Academic Coordination, Career Service, and Faculty. For the fiscal year July 2023 – June 2024, the Commission has invested a budget of 20,000 euros in the following activities:

- Joining Parks Liberi e Uguali, a non-profit association based in Milan, engaged in corporate diversity management on sexual orientation and gender identity.
- Organizing three webinars open to staff and faculty on the following topics:
 - a. Interculturalism and racial discrimination Instructor: Shata Diallo
 - b. Disability Management in companies Instructor: Consuelo Battistelli
 - c. Gender violence Instructor: Giovanna Vingelli
- Participation of the D&I Commission in a series of theoretical-practical workshops held by external consultants Elena Panciera, Elia Zeno Covolan, and Raky Doumbia, aimed at drafting an inclusive communication handbook for internal use by staff and faculty.
- Purchasing one hundred titles for the Milan and Rome libraries on topics of interest to the Commission, including queer/LGBTQIA+ studies, feminist theories, critical race theory, disability studies, inclusive communication, accessible design, etc.
- **Donation to Lucha y Siesta**, a safe house and support center for women and minors seeking to escape violence, based in Rome.

E. ALIAS CAREER FOR STUDENTS, STAFF, AND FACULTY

NABA aims to provide the student body with the opportunity to live in a serene study environment, attentive to the protection of privacy and individual dignity, where interpersonal relationships are based on fairness, mutual respect for freedoms, and personal inviolability.

Therefore, starting from the academic year 2021/22, access to the ALIAS CAREER—a temporary and non-consolidable bureaucratic profile alternative to the registry one—has been extended to transgender, non-binary, and gender non-conforming students in compliance with the principle of gender self-determination.

The requesting person will no longer be required to present neither a psychological report certifying a condition of "gender incongruence" neither an endocrinological clearance to certify the assumption of hormone replacement therapy (HRT) but will only sign a confidentiality agreement with the university. The ALIAS profile, which includes the issuance of a new badge and the creation of a new email box @studenti.naba.it with the chosen name, can be used for all on-campus activities and services, but cannot be used for internship applications, access to international mobility programs, or the drafting of official documents such as enrollment certificates or degree diplomas.

For students who have initiated a gender affirmation process under Law 164/82 concerning sex attribution rectification, the alias career will automatically lapse upon presentation of the rectified identity document to the Academic Secretariat, following the issuance of the competent court's ruling.

It is specified that students who have not yet reached the age of majority can request the activation of the alias career, provided they obtained the consent of parents/legal guardians.



5. NABA GENDER EQUALITY PLAN

NABA is committed to promoting gender equality, inclusivity, and diversity in all areas of its activities. This 2025-2027 gender equality plan has been developed to address existing challenges and promote a culture of equity and respect. This Gender Equality Plan (GEP) is the first formal document of NABA concerning gender equality. It identifies the efforts and achievements so far, culminating in the creation of a committee responsible for promoting gender equality policies within the company. It also serves as a starting point and compass for NABA's future gender equality goals, aiming to create the most humane and inclusive work environment possible. This plan will be published on the company's website, and the diversity and inclusion committee, along with the human resources office, will verify the plan's implementation and the actual improvements achieved, based on disaggregated data.

The plan includes five strategic areas, detailed below:

1 - ACHIEVING A BETTER GENDER BALANCE AMONG STAFF

SPECIFIC OBJECTIVE 1.1	BALANCE THE GENDER PERCENTAGE OF THE DIFFERENT TEAMS OPERATING IN NABA
ACTION	To promote gender balance in each department operating in NABA, proposing during the selection phase a reflection regarding the level and gender balance, considering the specific team. Where necessary, at least 20% of applications from the least represented gender in the specific department will be presented to the manager. The description of job vacancies will be carried out paying attention to inclusive language and including an explicit reference to NABA's intent to enhance diversity and inclusion in its staff.
RESPONSABILITY	HR Department
TIMING	The result obtained will be evaluated annually and any corrective action will be considered. Every six months the GEP team will calculate the gender mix for each department of NABA.
INDICATORS	Annual calculation of the level of gender balance by department. Trying for each department, where the number of employees is greater than 3, not to have representation of a single gender for more than 70% of the total.



SPECIFIC OBJECTIVE 1.2	REDUCING EVERY WAGE GAP BETWEEN GENDERS, PROGRESSIVELY POINTING AT FILLING IT.
ACTION	Considering the annual budget, to carry out an annual analysis of salaries disaggregated by gender and analyze any deltas, proposing corrective actions where necessary. The analysis of wage differentials will concern basic pay and incentives, since the literature indicates that the main divergences lie in the mobile component of the wage. The proposed action consists in progressively reducing the deltas and in any case monitoring them to avoid an increase in gender wage divergence.
RESPONSABILITY	HR Department
TIMING	2025-2027 (during this time, corrective actions and results monitoring will be carried out)
INDICATORS	Delta of average salaries disaggregated by gender and divided by role

SPECIFIC OBJECTIVE 1.3	PROMOTION OF FEMALE STAFF IN DIRECTOR'S ROLE (BOTH AT TITLE AND CONTRACTUAL LEVEL)
AZIONE	Promote female personnel to executive roles
RESPONSABILITY	Management Team and HR department
TIMING	Every 2 years the result obtained will be evaluated, considering the budget and company results
INDICATORS	Increase in the percentage of female directors on the total of executive population

Resources allocated to objective 1:

An effort of around 150 h/year has been estimated for the implementation of this objective. The cost is estimated in 5.280 €/year. Furthermore, it is estimated an allocation of around 70.000 € to finance the promotion of female gender talents to executive roles, during the period of this GEP.



2 - AWARENESS AND FIGHTING GENDER STEREOTYPES

SPECIFIC OBJECTIVE 2.1	ORGANIZING AND PROMOTION OF AWARENESS-RAISING ACTIVITIES TO RAISE AWARENESS AND COMBAT GENDER STEREOTYPES.
ACTION	Training and dissemination activities aimed at the internal community of the Academy on D&I topics with particular focus on combating gender stereotypes dedicated to the staff; involvement of students in workshops on gender violence in the world of work.
RESPONSIBILITY	D&I and GEP Team
TIMING	2025-2027
	■ Identification of an external network to the Academy to facilitate the provision of training;
INDICATORS	 Organization of at least 1 webinar per year for the staff on gender issues, promoted by the D&I Commission;
	 Organization of at least 1 workshop per year for students on gender issues, promoted by the D&I Commission.

SPECIFIC OBJECTIVE 2,2	SHARING A GENDER-SENSITIVE LANGUAGE IN THE ACADEMY'S INSTITUTIONAL COMMUNICATION, IN CONTRAST TO GENDER STEREOTYPES
ACTION	To create a working group to draw up guidelines, in order to promote gender-sensitive language in NABA's institutional communication
RESPONSIBILITY	D&I and GEP Team
TIMING	2025-2026
INDICATORS	Drafting, approval, publication and dissemination of guidelines for gender-sensitive use of language in the Academy's institutional communication

SPECIFIC OBJECTIVE 2.3	PROMOTION OF THE GENDER DIMENSION IN RESEARCH CONTENT AND TEACHING
ACTION	Strengthening the sharing activities of the projects carried out in collaboration with DRaFT (Department of Research & Faculty Training) or within NABA institutional teaching, through a periodic update of the Academy's website and communication channels.
RESPONSIBILITY	DRaFT & Faculty
TIMING	2025-2027
	Monitoring of the number of events organized by DRAFT and the Faculty about the gender issues.
INDICATORS	Organization of at least 1 event/talk dedicated to the sharing of research and/or educational projects on gender topics for the student body and staff.
	Monitoring the visibility of posts on gender issues spread on NABA's social channels. Percentage increase in visibility on the aforementioned posts compared to previous years.

Resources allocated to objective 2:

The allocation of internal resources has been estimated in 33.000 € and around 800 h of labor for the duration of this GEP. While the allocation of external resources has been estimated in around 11.000 € for collaborations and consultancies during this GEP.

3 - PREVENTING AND COMBATING SEXUAL HARASSMENT AND GENDER-BASED VIOLENCE

SPECIFIC OBJECTIVE 3.1	SURVEY AND MONITORING ACTIVITIES ON GENDER DISCRIMINATION AND VIOLENCE IN THE ACADEMY.
ACTION	Provision of a survey on gender violence, at multiple levels, within the organization, both for staff and teachers
RESPONSIBILITY	GEP Team
TIMING	2025-2027
INDICATORS	 Return of an analytical report Evaluation of any critical issues that have emerged and consequent proposal for corrective actions



SPECIFIC OBJECTIVE 3.2	TRAINING ACTIVITIES ON GENDER VIOLENCE
ACTION	Organization of training activities for staff and student body on the topic of gender violence and specifically regarding the fight against gender violence and the dissemination of information on external support services for cases of violence, harassment and discrimination.
RESPONSIBILITY	D&I e GEP Team
TIMING	2025-2027
	 Organization of at least 1 webinar per year for the staff on the topic of fighting gender violence.
INDICATORS	Organization of at least 1 webinar per year or workshop or conference or seminar for students on the topic of combating gender violence.
	Number of people reached by the information.

SPECIFIC OBJECTIVE 3.3	DRAFTING OF A SPECIFIC POLICY FOR THE MANAGEMENT OF GENDER VIOLENCE CASES
ACTION	 Creation of a working group to draft a specific policy for reporting and managing any cases of gender violence. Appointment of a trusted advisor for reporting cases of gender violence. Raising awareness among staff regarding the policy for managing any cases of gender violence
RESPONSIBILITY	HR and GEP Team
TIMING	2025-2027
INDICATORS	 Monitoring of the number of reports to the trusted advisor Monitoring of the number of people reached by the awareness and promotion activity of the policy in question.

Resources allocated to objective 3:

The use of internal resources has been calculated for an amount equal to $\[\le \]$ 10.000 for the duration of this GEP (approximately 300 hours of work) and approximately $\[\le \]$ 7.000 allocated to external consultancy and collaboration for the duration of this GEP.



4 - CONTRIBUTING TO INDIVIDUAL WELL-BEING THROUGH WORK-LIFE BALANCE MEASURES

SPECIFIC OBJECTIVE 4.1	BALANCE BETWEEN PRIVATE AND BUSINESS LIFE THROUGH THE INTRODUCTION OF FLEXIBLE HOURS
ACTION	Promote flexible working hours: flexible entry and exit with a 30-minute flexibility window. The day must be 8 hours long, but entry and exit can be regulated freely by the employee in agreement with their team and manager. The HR Team will prepare an agreement to be signed by each employee and a possible monitoring system.
RESPONSIBILITY	HR Department
TIMING	2025-2027
INDICATORS	Survey every two years on the use or otherwise of flexible hours and calculation of the percentage of employees who use flexible hours out of the total number of employees

SPECIFIC OBJECTIVE 4.2	MONITORING OF WELFARE NEEDS
ACTION	Survey on the need for a nursery school agreement or retirement home agreement for the elderly, and possible stipulation of agreements. Survey on the need for a coaching path in the event of return from prolonged absence from work due to illness/maternity-paternity leave, and possible stipulation of this service.
RESPONSIBILITY	GEP Team
TIMING	2025-2027
INDICATORS	In the event of a positive outcome from the survey, every three years employees using any activated agreements (with data disaggregated by gender) or the proposed coaching will be recorded and analysed.

SPECIFIC OBJECTIVE 4.3	PROMOTE THE CLEAR AND TRANSPARENT DISCLOSURE OF INFORMATION RELATED TO CONTRACTUAL REGULATIONS OF EMPLOYMENT
ACTION	To publish information on the intranet related to parental leave, and useful information related to the "life of an employee", in order to increase staff awareness and autonomy
RESPONSIBILITY	HR Team & Communication Team
TIMING	2025-2027
INDICATORS	Number of informative sections/articles published on the intranet every three years.

Resources allocated to objective 4:

A commitment of approximately $1.500 \in$ was calculated for the creation and drafting of company policies; $2.500 \in$ /year are dedicated to monitoring and updating the actions listed in point 4.

5 - FINALIZING A GENDER-SENSITIVE DATA MONITORING SYSTEM

SPECIFIC OBJECTIVE 5.1	PROMOTING AND ANALYZING THE GEP TOGETHER WITH THE GENERAL MANAGEMENT
ACTION	Planning of meetings on the implementation and progress of the GEP with the Governing Bodies and the General Management in order to guarantee its effectiveness
RESPONSIBILITY	GEP Team
TIMING	An analysis and study meeting on the implementation of the GEP plan will be held annually
INDICATORS	Number of meetings held annually (minimum 1 meeting/year)

SPECIFIC OBJECTIVE 5.2	DATA COLLECTIONS DISAGGREGATED BY GENDER
ACTION	Collection of quantitative and qualitative data in the Academy disaggregated by gender in different contexts (a) the percentage of genders in the Academy: teaching and research staff, technical-administrative staff, student community; (b) organizational structure and top positions broken down by gender; (c) contents of the teaching and research areas regarding the topic of gender, diversity and equality. A short annual report will also be published.
RESPONSIBILITY	GEP Team
TIMING	The analysis of the disaggregated data and the publication of the short report will take place annually.
INDICATORS	Evolution of KPIs of gender-disaggregated data

Resources allocated to objective 5:

A commitment of approximately 5.000 € has been calculated for the period of validity of this GEP, these resources will be used in the drafting of the monitoring system and in its analysis and presentation to the Company Management.

