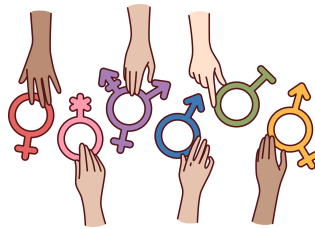




THE NETTUNIANI S.R.L.

Hydroclimatic Intelligence for Climate Adaptation and Resilience.



GENDER EQUALITY PLAN

2026 – 2028

Version 2.0 | Public Document

Voluntarily adopted and aligned with the Horizon Europe Gender Equality Plan framework.

Approved by:

Gustavo Chiquín — Co-Founder & CEO

Date: August 2026

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1. Introduction

Organisation's commitment

The Nettuniani S.R.L. is a Milan-based climate-tech company that builds hydroclimatic intelligence systems for municipalities, smart cities, utilities, and critical infrastructure.

We support local authorities, utilities, infrastructure operators, and civil protection bodies in anticipating and reducing the impacts of floods, droughts, water scarcity, and related climate risks.

As an early-stage climate-tech startup, The Nettuniani operates through a lean organisational structure in which functions such as recruitment, training and organisational development are distributed across the core team rather than assigned to dedicated corporate departments. This GEP is therefore designed proportionately to the company's current organisational structure and will evolve as the team grows, while maintaining the principles, monitoring mechanisms and commitments established herein.

Our stack combines artificial intelligence, IoT sensing and environmental data to move municipalities, utilities and infrastructure operators away from reactive crisis response toward predictive risk management, a model we refer to internally as Preparedness-by-Design.

We also engage actively in research, development, and innovation (R&D&I) projects, collaborating with public and private partners across the European research and innovation ecosystem to design and scale climate-adaptation solutions.

Gender equality is embedded in our operating model, not treated as an external compliance requirement. As a company active in the European research and innovation ecosystem, we recognise that diverse teams produce more robust technical and strategic outcomes, and we structure our governance, hiring and internal processes accordingly.

Purpose of the Plan. This Gender Equality Plan (GEP) sets out the concrete commitments, structures and actions through which The Nettuniani promotes gender equality across its organisation. It follows the four process-related requirements of the Horizon Europe GEP framework and addresses the five recommended thematic areas defined by the European Commission's GEAR framework.

The Plan runs for the three-year period 2026–2028, is reviewed annually against measurable indicators, and is published in full on the company website. It is signed by top management and communicated actively to staff, partners and stakeholders.

2. Legal and Policy Framework

This GEP is not a standalone corporate initiative: it operationalises a body of binding and non-binding EU law on gender equality that applies, directly or as best-practice benchmark, to The Nettuniani as a company incorporated and operating in Italy and participating in EU-funded research and innovation. The relevant instruments are set out below, from primary law to the specific Horizon Europe eligibility criterion.

Charter of Fundamental Rights of the European Union, Article 23 (2000/C 364/01). establishes equality between women and men as a fundamental right of EU law, including in employment, work and pay, and permits positive measures in favour of the under-represented sex. It is the constitutional anchor for every subsequent gender-equality instrument referenced in this Plan.

Treaty on the Functioning of the European Union, Article 157 (TFEU, *ex Article 141 TEC*). lays down the principle of equal pay for equal work or work of equal value between men and women, and is the treaty basis for the equal-pay legislation implemented below.

Directive 2006/54/EC (recast Directive, OJ L 204, 26.7.2006). on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation, consolidates EU equal-treatment law on

recruitment, working conditions, pay, occupational social security and dismissal. It underpins Sections 5.2 and 5.3 of this Plan on leadership and recruitment.

Directive (EU) 2019/1158 (*work–life balance for parents and carers, OJ L 188, 12.7.2019*). sets minimum EU standards for paternity leave (at least 10 working days), parental leave (four months per parent, two non-transferable), carers' leave (five working days per year) and the right to request flexible working arrangements. It is the direct legal basis for the work-life balance measures in Section 5.1, including our flexible-working and parental-leave commitments.

Directive (EU) 2023/970 (*pay transparency, OJ L 132, 17.5.2023*). strengthens the equal-pay principle through binding pay-transparency and enforcement mechanisms, including gender-neutral job-evaluation criteria and, for larger employers, gender pay-gap reporting. Member States must transpose it by 7 June 2026. While full reporting duties scale with headcount, The Nettuniani applies its gender-neutral pay-criteria principle now, ahead of the transposition deadline, as part of Section 5.3.

Directive (EU) 2022/2381 (*"Women on Boards" Directive, OJ L 315, 7.12.2022*). requires listed companies to reach at least 40% of the under-represented sex among non-executive directors (or 33% of all directors) by 30 June 2026, through transparent, merit-based selection procedures. The Nettuniani is not a listed company and therefore falls outside the Directive's binding scope, but adopts its 40% threshold as an internal benchmark for leadership and advisory-body composition in Section 5.2.

EU Gender Equality Strategy 2020–2025 (*COM(2020) 152 final*). sets the European Commission's policy objectives on ending gender-based violence, closing gender gaps in the labour market and achieving balanced participation in decision-making. It frames the priorities addressed across Sections 5.1 to 5.5 of this Plan.

Horizon Europe Regulation and GEP eligibility criterion (*Regulation (EU) 2021/695, Article 15; Horizon Europe Guidance on Gender Equality Plans*). makes having a Gender Equality Plan a formal eligibility condition for certain categories of applicants to Horizon Europe funding, structured around the four mandatory building blocks and five recommended thematic areas addressed in Sections 4 and 5 of this document.

United Nations Sustainable Development Goals: Goal 5: Achieve gender equality and empower all women and girls

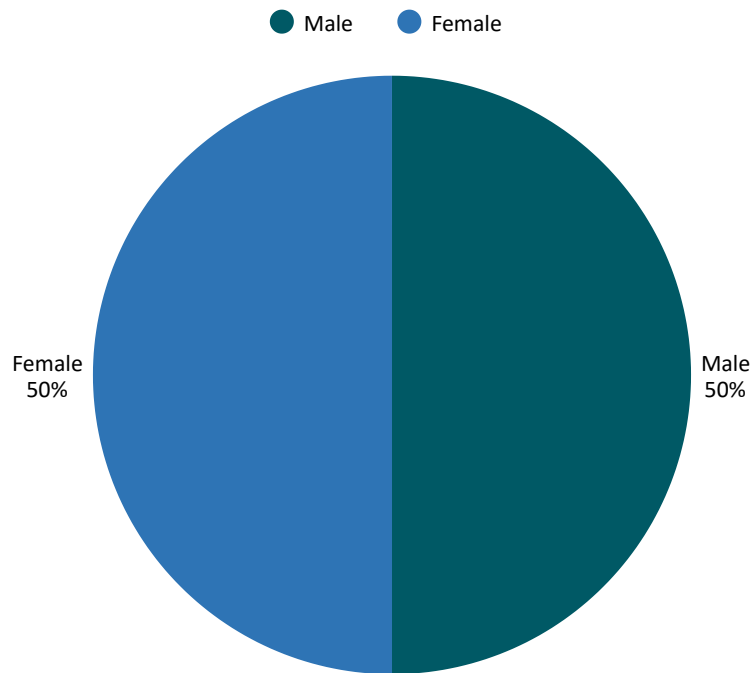
Achieving gender equality and empowering all women and girls is not just the right thing to do; it's essential for sustainable development. Goal 5 focuses on closing the gender gap and ensuring equal opportunities for all.

3. Our Team and the 2026 Gender Balance Baseline

The GEP is grounded in the actual composition of our organisation rather than in abstract targets. As of 2026, The Nettuniani's core team is composed of six professionals contributing to the company through different roles and formal collaborative arrangements, with a 50/50 gender balance (women/men) across leadership and operational functions. This baseline reflects the composition of the current core team and does not imply a uniform employment status across all contributors.

The Nettuniani was intentionally founded with one female and one male Co-Founder. This is particularly relevant in the climate-tech startup ecosystem, where women remain underrepresented among founders and senior decision-makers; from inception, the company has therefore embedded gender balance into its governance and growth choices.

This gender balance is not incidental: it reflects a deliberate approach to role allocation and recruitment since the company's founding, and it is the standard we intend to maintain as the team scales in 2026 and beyond. As new roles open in engineering, data science, business development or operations, gender balance will be treated as an explicit criterion in workforce planning alongside technical fit, so that growth does not erode the current parity.



2026 - Actual core-team baseline: 50/50

2027-2028 - Target: ≥40% representation of either gender

Figure 1. Core team gender composition as of 2026 baseline (n = 6).

The voluntary survey included the response options Female, Male, Non-Binary, Other and Prefer not to disclose.

4. Horizon Europe GEP Process Requirements

In voluntary alignment with Horizon Europe guidance on Gender Equality Plans, this GEP follows the four process-related building blocks below.

4.1 Publication

The GEP is a formal document, signed by the Co-Founder & CEO, published in a freely accessible section of the company website (www.thenettuniani.com), and actively disseminated to employees, collaborators and partners as part of standard internal communication.

4.2 Dedicated Resources

The Nettuniani commits human resources and gender expertise to the design, implementation, monitoring and evaluation of the GEP. A Gender Equality Focal Point — an internal staff member or an external consultant with relevant expertise — is appointed to coordinate implementation, with dedicated working time allocated from management and staff for GEP-related activities. A budget line is reserved for training, awareness-raising and, where needed, external expertise.

4.3 Data Collection and Monitoring

In alignment with the Horizon Europe Guidance on Gender Equality Plans, The Nettuniani voluntarily applies the practice of collecting sex- and/or gender-disaggregated data on personnel and carrying out annual monitoring based on defined indicators. This approach forms a baseline component of the present Plan and supports transparent monitoring of progress over the 2026–2028 period.

Baseline data on staff composition by gender covering founders, employees, collaborators and interns has been collected for 2026 and is presented in Section 3. This data will be updated annually, alongside monitoring of gender balance in leadership, recruitment outcomes, career progression and training participation. An annual progress report, built on these indicators, will be published and presented to management.

4.4 Training

Awareness-raising and training on gender equality and unconscious gender bias are provided to staff and decision-makers on a recurring basis, including at least one annual session for the full team and management, integration of gender-equality content into the onboarding of new hires, and active promotion of external training opportunities relevant to gender equality in research, innovation and climate-tech.

Climate-KIC partnership. The Nettuniani is part of the Climate-KIC startup community and has already completed dedicated training on these topics. On 24 June 2025, the company attended "**Embedding Diversity, Equity and Inclusion in Your Start-Up,**" a Climate-KIC session facilitated by Wallis van Oorschot Grant (Social Impact Delivery Lead at Climate-KIC) and supported by EIT Digital, covering the business case for DEI, practical measures for building diverse teams, inclusive product design, inclusive communications, and engaging diversity-focused investors.

Annual DEI & gender-equality training. For 2026–2028, The Nettuniani commits to at least one annual internal training session for the full team and decision-makers, complemented by participation in relevant external DEI and gender-equality training opportunities when appropriate to the company's activities in research, innovation and climate-tech.

Penelope Celario has developed substantive DEI expertise through the EDIFY_EDU project, which addresses skills gaps in management education related to equality, diversity and inclusion (EDI) by supporting skills assessment, learning offers, and validation/recognition pathways for management students and managers (including a focus on medium-sized companies). This experience provides direct evidence of DEI capacity at The Nettuniani and supports her appointment as the company’s Gender Equality Focal Point, responsible for coordinating GEP training actions and implementation follow-up within the lean organisational structure.

5. Recommended Thematic Areas

The five thematic areas recommended under the EIGE GEAR framework are addressed below through measures, quantified targets, timelines and named responsibilities.

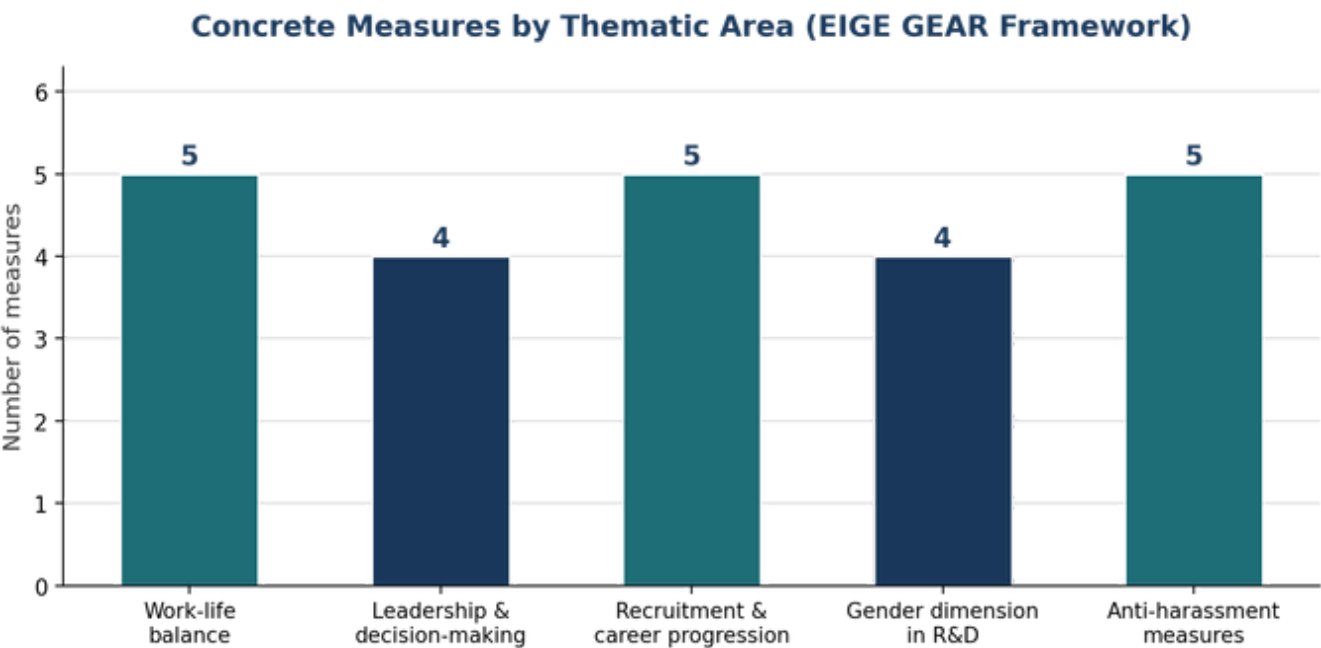


Figure 2. Distribution of concrete measures across the five EIGE GEAR thematic areas.

5.1 Work-Life Balance and Organisational Culture

Objective: foster an inclusive organisational culture that supports work-life balance for all genders and values diversity.

Measure	Target	Timeline	Responsible
Flexible working arrangements (remote/hybrid) and individual smart-working agreements	100% of staff have access to flexible arrangements	Continuous, 2026–2028	Management
Support for parental leave and reintegration after career breaks	Clear internal policy adopted; reintegration support provided	2026	CEO
Promotion of shared parental responsibilities and equal leave uptake	Awareness actions run; leave uptake monitored by gender	2026–2028	Focal Point
Inclusive communication and zero tolerance for stereotypes	Gender-sensitive language guidelines adopted	2026	Management
Annual climate survey including work-life balance questions	Survey conducted yearly; results inform actions	Annually	Focal Point

5.2 Gender Balance in Leadership and Decision-Making

Objective: sustain balanced representation of women and men in leadership roles and decision-making bodies as the company grows.

Measure	Target	Timeline	Responsible
Monitor gender composition of management, boards and key decision roles	Annual gender-balance report produced	Annually	Focal Point
Apply a gender-balance lens when expanding leadership or advisory bodies	Maintain ≥40% representation of either gender, building on the current 50/50 baseline	2026–2028	CEO
Apply a gender lens in major organisational decisions	Gender impact considered in transparent decision-making processes	Continuous	Management
Mentoring and leadership-development opportunities open to all genders	Equal access to development opportunities	2026–2028	CEO

Gender-Balance Monitoring Target, 2026-2028

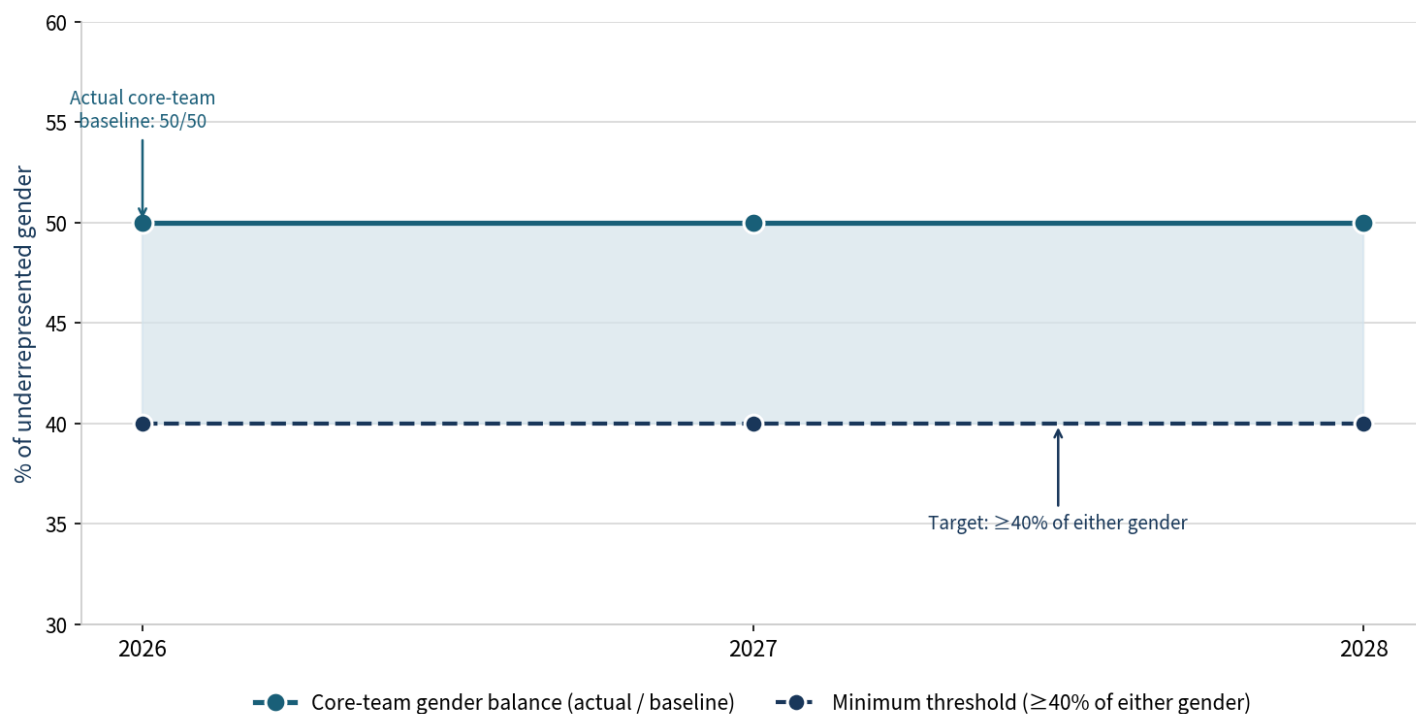


Figure 3. Core-team gender-balance baseline (2026) and predicted monitoring target (2027–2028).

5.3 Gender Equality in Recruitment and Career Progression

Objective: ensure recruitment, selection and career-development processes are fair, transparent and gender-sensitive, and that they preserve the company's current gender balance as headcount increases.

Measure	Target	Timeline	Responsible
Gender-neutral language in all vacancy notices	100% of job ads use inclusive language	From 2026	Management
Wide dissemination of vacancies across diverse channels	Multiple platforms used systematically	Continuous	Recruitment / Management
Gender-balanced selection panels where feasible	Mixed panels for all recruitments	2026–2028	CEO
Equal access to training, networking and career-development opportunities	Participation monitored by gender	Annually	Focal Point
Transparent criteria for career progression and performance evaluation	Criteria documented and communicated	2026	Management

5.4 Integration of the Gender Dimension into R&D and Training Content

Objective: integrate sex/gender analysis into the company's R&D activities, training modules and external communications where relevant to product design and public engagement.

Measure	Target	Timeline	Responsible
Consider gender and diversity impacts in the design of climate-adaptation and risk-communication tools	Gender lens applied to relevant product/service features	2026–2028	R&D Team
Include gender-sensitive approaches in preparedness training for municipalities and citizens	Gender dimension included in training content where relevant	From 2027	Project Leads / Management
Raise staff awareness of the relevance of gender in climate resilience and urban risk management	At least one internal session on gender and climate	2026–2027	Focal Point
Monitor gender composition of project teams and external collaborations	Data collected and reviewed annually	Annually	Focal Point

5.5 Measures Against Gender-Based Violence, Including Sexual Harassment

Objective: guarantee a safe, respectful and harassment-free working environment for everyone at The Nettuniani.

Measure	Target	Timeline	Responsible
Adoption of a clear Code of Conduct / anti-harassment policy	Policy approved, published and communicated	2026	CEO
Definition of confidential reporting channels and procedures	Clear procedure in place; staff informed	2026	Management
Appointment of a trusted contact person for reports of discrimination or harassment	Contact person designated and known to staff	2026	CEO
Awareness actions on zero-tolerance policy and respectful behaviour	Included in annual training	Annually	Focal Point
Prompt and fair handling of any reported cases	Zero tolerance; cases managed confidentially and fairly	Continuous	Management

6. Implementation, Monitoring and Evaluation

GEP Implementation Roadmap 2026–2028

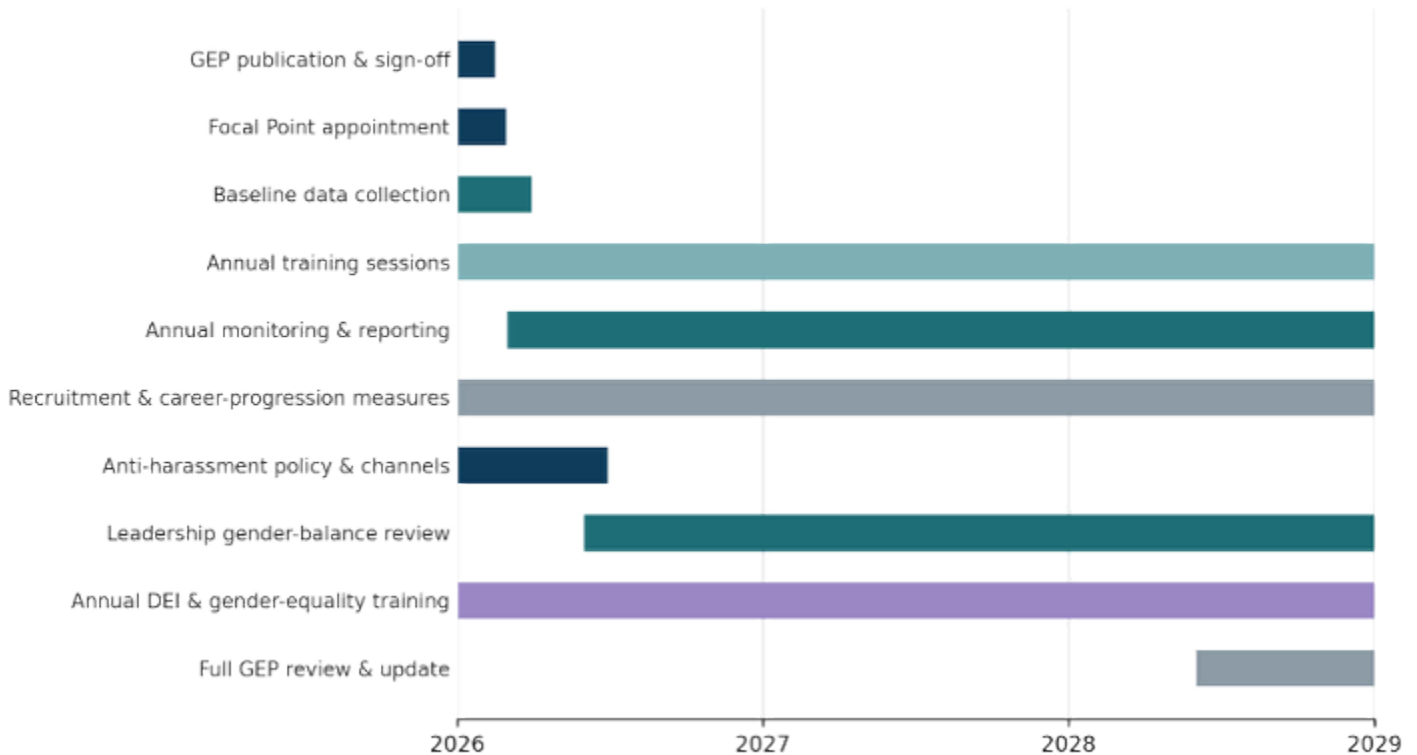


Figure 4. Implementation roadmap for GEP commitments, 2026–2028.

Governance. Overall responsibility for the GEP rests with the Co-Founder & CEO and the management team. Day-to-day coordination is delegated to the Gender Equality Focal Point, reflecting the company’s lean organisational structure. Progress is reviewed by management at least once a year and integrated into organisational planning as the team grows.

Timeline. The Plan covers the three-year period 2026–2028. An annual progress report is produced each year, with the first report due by the end of 2026, and a full review and update of the GEP scheduled for 2028.

Indicators and reporting. Key indicators tracked annually include: gender composition of staff and leadership (measured against the 2026 50/50 baseline and the $\geq 40\%$ benchmark); gender-neutral and inclusive recruitment practices and outcomes; career progression and access to development opportunities; participation in annual internal DEI & gender-equality training and other relevant external training opportunities; use of flexible working arrangements; status of policy adoption; and any reported incidents, handled confidentially. All data is collected in a sex/gender-disaggregated format and forms the evidentiary basis of the annual report.

7. Formal Declaration

By signing this document, the top management of The Nettuniani S.R.L. formally adopts the Gender Equality Plan 2026–2028, commits the resources necessary for its implementation, and undertakes to publish it on the company website and monitor its progress on an annual basis.

Voluntary Adoption and Horizon Europe Alignment

The Nettuniani voluntarily adopts this Gender Equality Plan as part of its commitment to equality, diversity and inclusion within its organisational development and participation in the European research and innovation ecosystem. As an early-stage private climate-tech startup, The Nettuniani is not subject to the Horizon Europe Gender Equality Plan eligibility criterion; however, this Plan has been designed in alignment with the Horizon Europe GEP framework and its recognised good practices. The company considers this voluntary alignment an appropriate foundation for embedding gender equality from an early stage and for ensuring that its policies, monitoring mechanisms and organisational practices can evolve responsibly as the company grows.

Signed digitally, August 2026

Gustavo Chiquín

Co-Founder & CEO The Nettuniani S.R.L.

This document is published on www.thenettuniani.com and is freely accessible.