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1. COMPANY INTRODUCTION AND LEGAL FRAMEWORK

Article 14 of the Spanish Constitution of 1978 proclaims the right to equality and non-discrimination on grounds of gender, assigning to the public authorities the obligation to promote the necessary conditions for equality to be effective.

Organic Law 3/2007 of 22 March 2007 on equality between men and women (hereinafter referred to as the "Equality Law") seeks to give effect to this right to equality by focusing on the field of employment. This law provides for the establishment of positive actions by companies to achieve real and effective equality in companies.

Recently, Royal Decree 901/2020 regulates equality plans and their registration and amends Royal Decree 713 of 2020 on the registration and deposit of collective bargaining agreements.

Additionally, Royal Decree 902/2020 on equal pay sets out specific measures on pay transparency and the obligation of equal pay for work of equal value to be included in gender equality plans.

In response to its legal obligations and as a company committed to gender equality, Inmobiliaria Colonial has created this equality plan with the commitment of the management, the will of the company and the legal representation of all workers to advance along these lines.

The objectives that Inmobiliaria Colonial wants to achieve with the creation of this first equality plan are:

- Promote the defence and effective application of the principle of equality between men and women, guaranteeing equal opportunities for entry and professional development at all levels in the workplace.
- Achieve a balanced representation of women and men in the company.
- Ensure that Human Resources management is in compliance with applicable legal requirements on equal opportunities.
- Prevent discrimination on grounds of gender in the workplace by establishing a protocol for action in such cases.
- Reinforce the company's commitment to Corporate Social Responsibility in order to improve the quality of life of employees and their families, as well as to promote the principle of equal opportunities.
- Establish measures that favour the reconciliation of work and family and personal life for Inmobiliaria Colonial employees.



2. MANAGEMENT DECLARATION OF COMMITMENT

Inmobiliaria Colonial declares its commitment to establishing and developing policies that integrate equal treatment or opportunities between women and men, without discriminating directly or indirectly on the basis of gender, as well as promoting and encouraging measures to achieve real equality within its organisation. It has made equal opportunities between women and men a strategic principle of its corporate and human resources policy, in accordance with the definition of this principle set out in Organic Law 3/2007 of 22 March for effective equality between women and men.

3. SUSTAINABLE DEVELOPMENT GOALS, ESG POLICY

Inmobiliaria Colonial aspires to clear leadership in ESG, with the equality policy being one of the aspects within the governance and social sphere. This ESG policy is published in Inmobiliaria Colonial's CSR report.

4. PERSONAL AND TERRITORIAL SCOPE AND TIMESCALE

This Equality Plan applies to all Inmobiliaria Colonial workplaces in Spain and to its entire workforce, as well as to any additional workplaces that may be created in the future and to all new people joining the company's workforce.

The duration of the equality plan is four years from the date of signing and its subsequent registration on 27 May 2022 in the register of Equality Plans of the Generalitat de Catalunya.

Throughout this period, the implementation of the planned actions will be monitored and a detailed report on the progress of the plan will be drawn up annually, which will be analysed within the Equality Monitoring Committee.

The committee shall generally meet on a quarterly basis.



5. DETERMINATION OF THE PARTIES TO THE CONTRACT

In order to create this Equality Plan, an Equality Committee was created, consisting of eight representatives, four representatives of the company management and four representatives of the workers.

The persons who make up this Equality Committee, and who have negotiated the actions of this Equality Plan and who accredit it with their signature, are the following:

Representatives of the company's management:

- Ms Àngels Arderiu
- Mr Abraham Martínez
- Ms Begoña Muñoz
- Ms Montserrat Rodríguez

Workers' representatives and members of the Works Council:

- Ms Cristina Tutusaus
- Mr Javier Suarez
- Ms Belén Ruiz-Casaux
- Ms Carmen Alonso

Once the diagnosis of the Equality Plan has been carried out, the tasks of this Equality Committee are as follows:

- Identify priority areas for action.
- Define the actions for each area of action.
- Agree on objectives and metrics for monitoring these objectives.

Once the plan has been finalised, they will be constituted as the Equality Monitoring Committee. Its objective will be to monitor and evaluate the degree of compliance, achievement of objectives and development of the programme on an annual basis.



6. RESULT OF THE DIAGNOSIS OF THE COMPANY'S SITUATION

In order to create Inmobiliaria Colonial's equality plan, the company's initial situation and the aspects relating to the scope of the plan itself are analysed.

Quantitative and qualitative information on the characteristics of the workforce and processes in these areas is used for this purpose:

- Workforce characteristics
- 2. Organisational characteristics, categories
- 3. Organisational changes
- 4. Family situation and reconciliation
- 5. Training
- 6. Salary policy
- 7. Occupational health
- 8. Sexual and gender-based harassment
- 9. Gender-based violence
- 10. Communication, values and external relations

The information refers to the two-year period prior to the start of the diagnosis, closing December 2021. In the qualitative analysis, both the existing processes and their documentation were analysed.

6.1. WORKFORCE CHARACTERISTICS

- The company is made up of 106 workers. There are 61 women and 45 men, giving a ratio of 58% women, which is within the ratio of 40-60 recommended by the Law. ¹
- The average age is 46 for men and 44 for women. By age bracket, the percentage of men is higher in the 40-49 age bracket and that of women in the under-30 age bracket.
- Analysing staff seniority, it can be seen that the ratio of women is higher in the highest seniority bracket (10 years or more) and in the bracket of less than 6 months.
- The average seniority is 11 years for men and 13 years for women.
- Most people have secondary or higher education. Women's educational background
 is slightly higher than men's, with their presence increasing with the level of
 education.
- Everyone has a permanent contract. There are no part-time contracts either; everyone has been hired on a full-time basis.



6.2. ORGANISATIONAL FEATURES

- Analysing the company's hierarchical structure, by gender, the ratio is lower in the higher hierarchical levels (Management and Line Managers). Women are more prevalent in the lowest level group. A slight vertical segregation is visible.
- If we analyse the areas by gender, we can see that the two most feminised areas are Legal Advisory Services and HR. An area is feminised or masculinised when one of the two genders accounts for more than 70% of the positions. Therefore, although management is slightly masculinised, it does not reach this level.
- In the analysis by gender of the workplaces, there is a greater presence of men in Madrid, due to the fact that this workplace is dominated by the Business area, with more men than women.
- The Legal Representation of Workers has a presence in both workplaces and people of both genders.

6.3. ORGANISATIONAL CHANGES

- Analysing the organisational changes, the highest number of new hires in the last two
 years were at the Administrative level. The gender breakdown shows that 65% of the
 new hires are women, which is higher than the 58% of women in the total workforce.
 The new hires in the Finance, Corporate and Business departments were of both
 genders. In HR, there was only one new hire, who was female.
- There were 17 terminations, with an incidence of 53% among women, a somewhat lower ratio than in the company overall.
- Half of the terminations were due to layoffs, with slightly more women than men. In the
 case of voluntary redundancies, the reverse is true: 3 men and 2 women left
 voluntarily.

6.4. FAMILY SITUATION AND RECONCILIATION

- 61% of the staff have children and have a similar average number of children. However, more women have children aged 3 years or younger.
- All employees have access to flexible working hours, except for 9 women who have reduced working hours.
- All those who have recently had children have taken paternity/maternity leave, except for one man. Only women have used the right to reduced working hours for caring. No men have reduced working hours.



6.5. TRAINING

- The analysis of the training received in the last two years shows that training is similar for both genders in languages and basic-technical training. As far as training linked to promotion is concerned, only one woman has received one specific training activity. And the total hours earned by women is slightly lower than their presence in the workforce.
- In terms of the category of trainees, women receive more hours per person in management, but as they receive less in all other categories, the overall average is lower than that of men.
- Moreover, the differences in management are due to both basic technical training and language skills. The same is true for line managers, although in this case it is men who benefit the most. In administration, the difference in favour of men is only in languages.
- The only training linked to promotion was given to a female line manager.
- Two people (one man and one woman) benefited from external training support (financial support).

6.6. SALARY POLICY

In order to carry out the quantitative analysis of the salary policy, the pay gap is analysed in accordance with the new regulation RD 902/2020.

For this purpose, groupings of jobs of equal value are used. The value of each job position responds to the objective characteristics and requirements of the position without regard to the person who occupies it or the salary he/she receives. These characteristics are factors of the type: competences, planning, communication and influencing, problem solving and accountability (in decision making and its impact).

Within each group, the pay gap is calculated and compared with the 25 per cent statutory threshold. The lack of justified reasons for a gap of more than 25% leads to the definition of corrective measures.

The analysis is carried out on Total Remuneration, Fixed Salary and Variable Allowances. The gap is compared across two statistics: the average and the median. The gap is calculated: (average Men - average Women)/average Men or (median Men - median Women)/median Men.

Thus, a positive gap corresponds to higher wages for men than for women, and a negative gap corresponds to lower wages for men than for women.



Everyone has been ranked according to the value of the position they hold. Following this analysis, people have been classified into 19 levels (with G8 corresponding to the lowest possible rating and G28 to the highest possible rating). And of these groups, only eight can be compared for equal value positions by gender, as the others are single gender. The presence of women is not homogeneous across the groups; it is higher in lower value groups. This responds to the organisational structure already known, and analysed in the diagnosis of the equality plan.

The aggregate calculation of the total company gap (without group detail) is carried out with the salary information of men and women of the entire workforce (not only in these eight comparable groups) and without taking into account which group each person belongs to, as determined by the regulations. The total company gap is not compared to the 25% threshold because of the intermingling of positions of different value.

And it is 55% on average, because women hold, in relative terms, lower value positions than men. If we remove the outliers, however, the median is exactly 25%.

By analysing groups of positions of equal value, the gap reaches maximum values of 25% only in group G12 and it is a negative gap indicating a higher salary for women than for men.

In the other groups, as the value of the position increases, the gap becomes positive (higher salaries for men), although it does not reach 25% in any of them: they are all below 20%.

6.7. OCCUPATIONAL HEALTH

- There is more temporary sick leave among women than among men, mainly due to illness.
- Accident-related sick leave includes COVID-19, and are more equal in number between the two genders.
- In addition, the average duration of sick leave for women is much longer than for men. This is very much conditioned by the long-term sick leave of two women.
- The average duration of accident-related sick leave among women is also higher, conditioned by a specific case.



6.8. SEXUAL AND GENDER-BASED HARASSMENT

In this area of action there is no quantitative information to analyse, as there are no complaints.

From the analysis of documentation and qualitative information provided by the internal team, it appears that:

- There is a protocol for detection and action in the event of a complaint of harassment.
- The complaints assessment committee is made up of women, which facilitates a gender perspective in the process.
- There are no sexist images or posters in internal and external communications.
- Occasionally there are comments that can be considered as verbal microaggressions, although they are not reported.

6.9. GENDER-BASED VIOLENCE

- There are no recruitment programmes for women who are victims of gender-based violence.
- There is no specific internal programme to support female employees who may suffer from gender-based violence outside the workplace.

6.10. COMMUNICATION, VALUES AND EXTERNAL RELATIONS

Based on the analysis of qualitative information and review of documentation, it is known that:

- There are initiatives to raise awareness of social/personal aspects (e.g. sustainability).
- The management is willing to improve on gender equality issues.
- There are mentions of equal opportunities in external documents (Corporate CSR Report).
- There are no external social actions with entities or NGOs promoting Equal Opportunities, although this is being evaluated.
- Colonial annually grants scholarships to two underprivileged students and from a gender perspective.



7. DEFINITION OF QUALITATIVE AND QUANTITATIVE OBJECTIVES

The aim of the Colonial Equality Plan is to create a space where equal opportunities between women and men are a cross-cutting theme in all internal, external and communication processes.

Once the diagnosis of Inmobiliaria Colonial's situation with regard to equal opportunities has been carried out, the main lines or general objectives on which the Equality Plan is based are as follows:

- Achieve gender equality through promoting and developing full equality of treatment within the company.
- Create an organisational culture and corporate values around gender equality.
- Spread an image of commitment to equal opportunities.
- Implement selection, promotion and training processes focused on enhancing the presence and development of under-represented groups and avoiding possible indirect segregation.
- Promote co-responsibility in the area of family reconciliation as a measure to equalise roles.
- Ensure a gender-sensitive workspace that takes into account the personal needs of the staff.
- Implement a process to monitor and reduce the potential pay gap.
- Ensure a work environment free of sexual and gender-based harassment.

Specifically, within and throughout the aspects analysed in the diagnosis, these general objectives are specified in the following specific objectives, defined within each of the following areas:

- 1. Selection and recruitment.
- 2. Professional classification.
- 3. Recruitment and working hours.
- 4. Professional promotion.
- 5. Training.
- 6. Family Situation and Reconciliation.
- 7. Salary Policy.
- 8. Occupational Health.
- 9. Sexual and gender-based harassment.
- Communication, Values and External Relations.



7.1. SELECTION AND RECRUITMENT

- Have an internal selection and recruitment process for future employees that complies with equality criteria to balance gender ratios in positions and categories.
- Create a gender-sensitive internal promotion process.
- Collaborate with educational entities to encourage gender equity in the positions that are currently more feminised or masculinised.

7.2. PROFESSIONAL CLASSIFICATION

Review Inmobiliaria Colonial's current professional categories in order to redefine, if necessary, new professional categories or subgroups within them that are homogeneous, adapted to Inmobiliaria Colonial's current business model, and with a gender perspective.

7.3. RECRUITMENT AND WORKING HOURS

Review Inmobiliaria Colonial's recruitment and working hours arrangements to identify and prevent gender inequalities.

7.4. PROFESSIONAL PROMOTION

Prioritise internal promotion, on an equal footing with external candidates, over external recruitment, with the aim of favouring women's access to positions of responsibility and to masculinised areas. And also to foster men joining feminised areas.

7.5. TRAINING

Ensure that training opportunities ensure gender equality and equal opportunities, both in terms of access to training and in terms of gender equity in the allocation of training.



7.6 FAMILY SITUATION AND RECONCILIATION

Favouring family reconciliation for the workforce. This will be done through various measures covering the following aspects:

- Continue to facilitate flexible working hours to promote work-life balance for both genders.
- Extension of leaves of absence that the Workers' Statute and the Construction Agreement offer to their employees and other incentives.
- Encourage co-responsibility of the entire workforce.
- Creating and implementing a support and assistance programme for births and adoptions.

7.7 SALARY POLICY

Ensure pay equity in the organisation.

- At present, with the exception of one group where there is a pay gap of 25.5%, there is no gender pay gap in the organisation. And for this group, the salary policy will be reviewed in order to reduce the gap in the coming years.
- Processes will be defined to ensure that pay equity is maintained with new recruits, promotions and possible changes to Inmobiliaria Colonial's organisational structure.

7.8 OCCUPATIONAL HEALTH

Prevent and reduce occupational ill-health through two types of actions, with a gender perspective:

- As the diagnosis shows that there is a greater number and duration of sick leave among women, an analysis will be made to see if there is a possible common cause that the company can influence in order to prevent and reduce it.
- Continue to offer psychological support to workers from pregnancy until the first year of the child's life.



7.9 SEXUAL AND GENDER-BASED HARASSMENT

- Ensure an internal process for reporting sexual and moral harassment that is known throughout the organisation, with a transparent board that ensures the neutrality and confidentiality of the complainant.
- Ensure and prevent harassment in all cases, and to this end, early detection and training will be key elements.
- Be an agent of change in society by promoting the development of non-violent behavioural models from an early age, increasing social perception of the various forms of gender-based violence and its relation to inequality.

7.10 COMMUNICATION, VALUES AND EXTERNAL RELATIONS

- Continue to use inclusive language in all Inmobiliaria Colonial's communication both internally and externally and ensure that it does not perpetuate gender stereotypes.
- Be an agent of change in society and position itself as a company that wants to contribute to changing values in society by encouraging girls and boys to be educated in the same way.



8. TIMETABLE OF ACTIONS, EVALUATION AND PERIODIC REVIEW

Based on the specific objectives, a number of actions are defined to cover them, which are also detailed below, grouped by the eight areas seen.

- 1. Selection and recruitment.
- Professional classification.
- 3. Recruitment and working hours.
- 4. Professional promotion.
- 5. Training.
- 6. Family Situation and Reconciliation.
- 7. Salary Policy.
- 8. Occupational Health.
- 9. Sexual and gender-based harassment.
- 10. Communication, Values and External Relations.

Each of the actions is detailed below with a fact sheet. Each sheet includes:

- <u>Area</u> analysed in the plan where it has been considered appropriate to implement an action..
- <u>Timetable:</u> a timetable for the implementation of the action. Some actions will be ongoing from the start of implementation.
- <u>Objective</u> of the equality plan that this action aims to achieve to reach effective equality in the organisation.
- <u>Description:</u> the details of the action that has been agreed to achieve the objective.
- Monitoring and evaluation: defines how the implementation of the action will be measured in order to be able to assess whether the objective included in the plan is achieved.
- <u>Personnel to whom it is addressed:</u> determines whether the action affects the entire workforce or a specific group or collective.
- <u>Personnel responsible:</u> defines the position of the person(s) within the company who is ultimately responsible for each action's implementation.
- <u>Means and materials:</u> the means and resources, both material and human, required to implement the plan.
- <u>Communication mechanism:</u> it sets out how interested parties are to be informed of such action. These can be internal, external or both.

As can be seen in each of the individual action sheets, a timetable for action has been defined according to the plan's implementation priorities.



8.1 SELECTION AND RECRUITMENT

ACTION SHEET	1.
AREA	SELECTION AND RECRUITMENT
ACTION	Create a guide to selection principles.
TIMETABLE	From Quarter 3 2023
OBJECTIVE	Have an internal selection and recruitment process for future employees that complies with equality criteria to balance gender ratios in positions and categories.
DESCRIPTION	The guide should specify all actors involved in the process and what their role and responsibility should be. 1) We will ask the consultants and headhunters involved in the selection process for their protocols/plans to ensure that they comply with the equality criteria. 2) In addition to informing them in writing of the selection criteria for Colonial's values, emphasising the equality policy. Written information shall be provided on: Technical profile and the competencies required by the position. 3) Define the interview models by blocks, differentiating between junior and experienced profiles. The questions vary according to the competencies to be assessed in each position.
CRITERIA AND REQUIREMENTS FOR SELECTION	After defining both the technical and competence aspects. Subsequent evaluation of both aspects and additionally of the company's values. This way we focus on the maximum person/job fit. Recruitment process and definition of requirements and profile from HR. Combination of definition between HR and Area. Balance of soft skills in all areas. HR guarantees that they are in the description. Control departmental biases. Review the use of inclusive language and that the description does not contain unconscious bias. Selection Criteria in the Guide that there is a 50/50 gender balance. Promote softskills assessment in entrance exams.
INTERNAL ACCREDITATIONS	Basic training in Selection and inclusive language for all those involved in the process.
EXTERNAL ACCREDITATIONS	Approach entities that work for IO (have IP, recognition, code of good practice, etc.) Check and reinforce privacy in the offers published by consultancy firms and headhunters. Blind CV. No photo, age or gender. Collaborate with organisations that promote non-sexist education.
CANDIDATE IDENTIFICATION	Prioritise the under-represented and benchmark those who are under-represented (% of men and women). POSITIVE DISCRIMINATION , explicit mention of company's commitment to hiring women in male-dominated positions or vice versa, regardless of the means of recruitment.
MONITORING AND EVALUATION	
PERSONNEL TO WHOM IT IS ADDRESSED	New candidates
PERSONNEL RESPONSIBLE	The person occupying the "People Development" position in Colonial.
MEANS AND MATERIALS	HR team
COMMUNICATION MECHANISM	In the publication of the Company's Equality Plan, in addition to an internal mailing to all staff and in the open positions that are communicated, specifying this commitment.



ACTION SHEET	2.
AREA	SELECTION AND RECRUITMENT
ACTION	Internal publication of vacancies
TIMETABLE	From Quarter 3 2022
OBJECTIVE	Create the internal promotion process, with a gender perspective, and continue with publishing open positions in order to be able to apply for a vacancy within the organisation. Establish criteria and responses to apply or not to apply in the processes. (Always with the confidentiality of the candidate)
DESCRIPTION	Initiate the process of advertising vacancies internally with a clear requirements dossier. Include it in a promotion/horizontal process of interdepartmental exchange as part of the career plan, and without losing sight of the gender perspective.
MONITORING AND EVALUATION	
PERSONNEL TO WHOM IT IS ADDRESSED	All staff
PERSONNEL RESPONSIBLE	The person occupying the people development position in Colonial.
MEANS AND MATERIALS	HR team and company intranet
COMMUNICATION MECHANISM	Company intranet.

ACTION SHEET	3.
AREA	SELECTION AND RECRUITMENT
ACTION	Internal, external, sectoral barriers to recruitment
TIMETABLE	From Quarter 3 2022
OBJECTIVE	Minimise as far as possible all kinds of barriers to best practice
DESCRIPTION OF THE PROBLEM	There are no technological profiles that are the ones that give the most gender problems. They do exist for hiring men in HR, or women in Investment for example. There is a lot of equality in the policies, some pregnant women have been hired and one manager is on paternity leave.
DESCRIPTION OF THE ACTION	Force positive discrimination by ensuring that there are sufficient candidates of the under-represented gender in selection processes. Collaborate with educational institutions to train future candidates and to encourage the under-represented gender into these roles. Specific effort to recruit these positions in specific job boards.
CRITERIA AND REQUIREMENTS FOR SELECTION	Collaborate with educational entities to empower the underrepresented gender in the business area. Create future candidates in these areas, Force positive discrimination for managerial positions.



CANDIDATE IDENTIFICATION	Diversity of styles of collaboration, leadership, communication, etc.
MONITORING AND EVALUATION	
PERSONNEL TO WHOM IT IS ADDRESSED	All staff
PERSONNEL RESPONSIBLE	The person occupying the "People Development" position in Colonial.
MEANS AND MATERIALS	HR team
COMMUNICATION MECHANISM	In the publication of the company's Equality Plan. Commitment to comply.



8.2 PROFESSIONAL CLASSIFICATION

ACTION SHEET	1.
AREA	Professional Classification
ACTION	Redefinition of the professional classification to adapt it to the new organisational model and to ensure there are no gender differences.
TIMETABLE	Quarter 2 2023
OBJECTIVE	Carry out an analysis of the current professional classification in order to redefine, if necessary, new professional categories or subgroups within them, which are homogeneous and adapted to Colonial's new business model and strategy. And to do so with a gender perspective.
DESCRIPTION	A review of Colonial's current professional categories is needed. The business model and the organisation have evolved and the current classifications are very broad, are not homogeneous and do not allow an analysis of possible gender differences. 1 - The current business situation has to be analysed and the professional classification has to be adapted. Or create subgroups within the occupational classification. 2 - Once the classifications and/or subgroups have been redefined, a further analysis by gender will be made for each of them. And it will be determined whether there are any occupational classifications or sub-groups that are masculinised or feminised. 3 - If there are gender differences in the new occupational classification (or subgroups), an action plan will be defined so that progressively there will be no gender differences in any of the new occupational classifications (or subgroups).
CRITERIA AND REQUIREMENTS FOR SELECTION	Understand the initial classification and the company's needs in order to be able to make adjustments to the professional classification if necessary. Or keep it and simply create sub-groups within each level of the classification.
MONITORING AND EVALUATION	1-Approval of the new classifications (or new subgroups) at the end of the process, to be reviewed every four years. 2-Annual assessment that there are no gender differences in each of the redefined classifications (or subgroups). 3- If there are gender differences in point 2. Annual assessment of possible corrective measures to ensure that there are no masculinised or feminised occupational classifications (or subgroups).
PERSONNEL TO WHOM IT IS ADDRESSED	All staff
PERSONNEL RESPONSIBLE	HR management
MEANS AND MATERIALS	HR team
COMMUNICATION MECHANISM	 If there is a change in job classification, each person concerned must be formally notified. And if there is only one creation of subgroups within each category, it is also recommended to inform the staff. Of the possible differences by gender in the new professional classification (or subgroups), in the monitoring plan of the equality plan. Of the possible measures, if necessary, to correct the masculinisation or feminisation of some professional classification (or subgroups), in the monitoring plan of the equality plan.



8.3 RECRUITMENT AND WORKING HOURS

ACTION SHEET	1.
AREA	Recruitment and working hours
ACTION	Recruitment modes
TIMETABLE	Quarter 3 2022
OBJECTIVE	Analysis of the different types of recruitment modes
DESCRIPTION	Continue revising recruitment modes and working hours to avoid discrimination in terms of equality.
CRITERIA AND REQUIREMENTS FOR APPLYING ONE CONTRACT OR ANOTHER	In Colonial, 99% of contracts are permanent.
MONITORING AND EVALUATION	Every 6 months
PERSONNEL TO WHOM IT IS ADDRESSED	The HR Area
PERSONNEL RESPONSIBLE	Head of Administration (HR Manager)
MEANS AND MATERIALS	HR team
COMMUNICATION MECHANISM	Report to the Works Council

ACTION SHEET	2.
AREA	Recruitment and working hours
ACTION	Working time arrangements (shifts)
TIMETABLE	Quarter 3 2022
OBJECTIVE	Analysis of the different types of working hours
DESCRIPTION	Continue reviewing the types of working hours in the company to identify and prevent gender inequality.
CRITERIA AND REQUIREMENTS FOR APPLYING ONE TYPE OF WORKING HOURS	All working hours are adapted to the job, with no variation of working hours within the same jobs.
MONITORING AND EVALUATION	Every 6 months
PERSONNEL TO WHOM IT IS ADDRESSED	All staff
PERSONNEL RESPONSIBLE	Head of Administration (HR Manager) + People development
MEANS AND MATERIALS	HR team
COMMUNICATION MECHANISM	Via works council



8.4 PROFESSIONAL PROMOTION

ACTION SHEET	1.
AREA	PROFESSIONAL PROMOTION
ACTION	Create internal promotion policy
TIMETABLE	Quarter 4 2022
OBJECTIVE	Prioritise internal promotion over external recruitment as long as the employee meets the position's requirements. Ensure the implementation of development and training policies to enhance internal promotion, as well as horizontal interdepartmental movements.
DESCRIPTION	Design a gender-sensitive internal promotion process. Incorporate among others: inclusive language, commitment and equality.
CRITERIA AND REQUIREMENTS FOR PROMOTION	Define promotion process with a list of clear requirements for participation and objective selection criteria. Include job description with inclusive language and gender perspective. Communication to staff/publication on intranet.
INTERNAL ACCREDITATIONS	Training of the decision-making team in equal opportunities. The training will be language inclusive (for HR if it prepares job descriptions and open positions) Equality awareness-raising for people in charge of teams.
CANDIDATE IDENTIFICATION	Align training and promotion within the career planning process. To consider within the CCC project
MONITORING AND EVALUATION	On a semi-annual basis, new positions will be analysed as well as how they have been offered internally and how they have been filled.
PERSONNEL TO WHOM IT IS ADDRESSED	All staff
PERSONNEL RESPONSIBLE	The person occupying the "People Development" position in Colonial.
MEANS AND MATERIALS	HR team
COMMUNICATION MECHANISM	In the publication of the company's Equality Plan, intranet.

ACTION SHEET	2.
AREA	PROFESSIONAL PROMOTION
ACTION	Career plans with a gender perspective
TIMETABLE	From Quarter 1 2023
OBJECTIVE	Ensure that gender is not a barrier to career development at Colonial.
DESCRIPTION	Ensure professional balance and equal opportunities. Training policies should be inclusive and in the interest of protecting equality plans through equity and adaptation to the needs of each gender.
MONITORING AND EVALUATION	Six-monthly
PERSONNEL TO WHOM IT IS ADDRESSED	All the company
PERSONNEL RESPONSIBLE	The person occupying the people development position in Colonial.
MEANS AND MATERIALS	HR team and company intranet
COMMUNICATION MECHANISM	Equality Plan



ACTION SHEET	3.
AREA	PROFESSIONAL PROMOTION
ACTION	Colonial Career Conversations "CCC" / Promotion Process
TIMETABLE	From Quarter 4 2022
OBJECTIVE	Identify internal talent and ambitions of all professionals
DESCRIPTION	Through the CCC, all employees will discuss key aspects of both their career and their day-to-day work with their appraiser: performance, objectives, training, networking, etc. In this conversation, the employee's ambitions and aspirations will be discussed.
MONITORING AND EVALUATION	
PERSONNEL TO WHOM IT IS ADDRESSED	The HR Department and the entire Management Committee
PERSONNEL RESPONSIBLE	The person occupying the people development position in Colonial.
MEANS AND MATERIALS	HR team and company intranet
COMMUNICATION MECHANISM	ccc



8.5 TRAINING

ACTION SHEET	1.
AREA	Professional Training
ACTION	Ensure that annual training plans guarantee equal access regardless of gender and reconciliation measures.
TIMETABLE	From Quarter 3 2022
OBJECTIVE	Continue to ensure that the annual training plan must reflect the training needs appropriate to Colonial's strategy. Ensuring that training opportunities ensure gender equality and equal opportunities.
DESCRIPTION	Maintain mechanisms to ensure that annual training plans, in accordance with company policy, guarantee equal access regardless of gender and reconciliation measures.
CRITERIA AND REQUIREMENTS FOR THE TRAINING PLAN	Clarity in timetables and training modes. Ensure access to it with a gender perspective and the needs of work-life balance.
CONSULTANTS AND TRAINERS	Prioritise external training with companies trained in I-O psychology.
MONITORING AND EVALUATION	Six-monthly
PERSONNEL TO WHOM IT IS ADDRESSED	Area managers
PERSONNEL RESPONSIBLE	The person occupying the "People Development" position in Colonial.
MEANS AND MATERIALS	HR team and external partners
COMMUNICATION MECHANISM	ccc

ACTION SHEET	2.
AREA	Professional Training
ACTION	Equity in the allocation of training.
TIMETABLE	From Quarter 3 2022
OBJECTIVE	Continue to ensure that the distribution of training investment in conditions of gender equality and equal opportunities.
DESCRIPTION	The training opportunities must reach all areas and positions regardless of gender and always be aligned with the company's needs and strategy.
MONITORING AND EVALUATION	Six-monthly
PERSONNEL TO WHOM IT IS ADDRESSED	All areas.
PERSONNEL RESPONSIBLE	The person occupying the "People Development" position in Colonial.
MEANS AND MATERIALS	HR team and external partners
COMMUNICATION MECHANISM	Equality Plan Monitoring Committee



8.6 FAMILY SITUATION AND RECONCILIATION

ACTION SHEET	1.
AREA	Reconciliation
ACTION	Revision of working hours to promote work-life balance for both genders.
TIMETABLE	From Quarter 3 2021
OBJECTIVE	Continue facilitating flexibility of starting and finishing times of up to two hours for workers with reduced working hours or with the possibility of taking advantage of the same in accordance with article 37.5 of the WS.
DESCRIPTION	Continue to improve the legal framework of article 37.5 of the WS, and continue to provide workers in these circumstances with flexible working hours that allow them to reconcile their personal and professional lives and even avoid having to reduce their working hours and consequently their salaries in order to be able to reconcile work and family life. With this measure, it will be possible to work 8-hour shifts continuously without a decrease in salary and always respecting the legal rest period for shifts of more than six hours. The impact of the application of such a measure on the general functioning of the Area/Department shall be assessed.
MONITORING AND EVALUATION	This action is communicated with the launch of the Equality Plan so that employees who are eligible for the measure can request it. The Equality Plan Monitoring Committee will review on a case-by-case basis the reasons for the acceptance or rejection of the measure for each applicant worker.
PERSONNEL TO WHOM IT IS ADDRESSED	All persons eligible for reduced working hours in accordance with the cases provided for in art. 37.5 WS and the sectoral Provincial Agreement.
PERSONNEL RESPONSIBLE	Area Managers. HR
MEANS AND MATERIALS	Formal request to the Area Manager. It is subsequently escalated to HR.
COMMUNICATION MECHANISM	After the publication of the Equality Plan.

ACTION SHEET	2.
AREA	Reconciliation
ACTION	Extension of leaves of absence that the WS and the Construction Agreement offer to their employees and other incentives.
TIMETABLE	From Quarter 3 2022
OBJECTIVE	Continue improving the work-life balance of all staff in different areas of their personal lives in conditions that guarantee equality and extend the regulation of art. 34.8 of the WS in order to improve work-life balance with a gender perspective.
DESCRIPTION	In order to promote and facilitate the co-responsibility of the entire workforce, Colonial has extended the following legal leaves that its employees already have: Madrid Construction Agreement: ARTICLE 53 - The days granted in point 1, paragraphs b (birth/adoption), d (death) and e
	(serious illness/accident), shall be extended by two more calendar days. Also taking into account point 2 (persons in registered partnerships) of the aforementioned article, and the paragraph stating that in the event of needing a transfer to attend to the reasons in the aforementioned paragraphs, the days granted shall be extended by two more calendar days (due to travel).



	- The days granted in paragraph 1, subparagraphs b (death) and c (serious illness), shall be extended by two additional calendar days. Also taking into account the paragraph that states that in the cases provided for in these two paragraphs, the first day of leave shall be a working day, and at least two of the days shall be working days In terms of the birth of a child in the case of Barcelona, the same shall apply as for workers at the Madrid workplace.
MONITORING AND EVALUATION	Implementation of measures.
PERSONNEL TO WHOM IT IS ADDRESSED	The whole company (The Equality Plan will be handed out at onboarding).
PERSONNEL RESPONSIBLE	HR
MEANS AND MATERIALS	
COMMUNICATION MECHANISM	Internal communication to all staff when the Equality Plan is communicated. Inclusion in the welcome dossier for new employees.

ACTION SHEET	3.
AREA	Reconciliation
ACTION	Encourage co-responsibility of the entire workforce
TIMETABLE	Quarter 4 2022
OBJECTIVE	Encourage men and women to take joint responsibility for family obligations, so that the workload does not fall on one gender, and does not unequally affect the working day and career of one gender.
DESCRIPTION	Communicate to the workforce that Colonial is a company that promotes and facilitates co-responsibility for the entire workforce. Organise training sessions to raise awareness among the entire workforce of the importance of co-responsibility.
MONITORING AND EVALUATION	Annual
PERSONNEL TO WHOM IT IS ADDRESSED	All the company.
PERSONNEL RESPONSIBLE	HR
MEANS AND MATERIALS	Co-responsibility training, internal co-responsibility communication campaign and review of processes to ensure equal opportunities.
COMMUNICATION MECHANISM	Publication of the Equality Plan

ACTION SHEET	4.
AREA	Reconciliation
ACTION	Support and assistance programme for births and adoptions
TIMETABLE	From Quarter 3 2021
OBJECTIVE	Provide assistance to mothers and fathers-to-be at Colonial during pregnancy, maternity/paternity leave and their return to work.



DESCRIPTION	An assistance programme for mothers and fathers in Colonial has been designed. This should include support at each stage. Proposal: - during the two months preceding the birth and the month following the end of the maternity/paternity leave, offer the possibility of remote work, according to need, to the mother and/or father-to-be. If both parents work at Colonial, remote working is limited to one person persons adopting a child shall be given the same possibilities, taking into account their situation.
MONITORING AND EVALUATION	Definition of the process for supporting each new mother/father
PERSONNEL TO WHOM IT IS ADDRESSED	All the company.
PERSONNEL RESPONSIBLE	HR.
MEANS AND MATERIALS	Make room for it within the Colonial Takes Care of You programme.
COMMUNICATION MECHANISM	Publication of the equality plan.



8.7 SALARY POLICY

ACTION SHEET	1.
AREA	SALARY POLICY
ACTION	Colonial ensures that there is no unjustified gender pay gap for positions of equal value
TIMETABLE	Correction from Q1 2023
OBJECTIVE	Colonial ensures that there is no unjustified gender pay gap in positions of equal value.
DESCRIPTION	Colonial wants to ensure that there is no unjustified gender pay gap in positions of equal value. For this reason, and in order to achieve a progressive decrease in the number of unjustified cases, it is going to: 1 - Include the information from the salary audit of positions of equal value in the annual salary review of the workforce. In order to be able to assess before salary reviews are made what the starting point salary is for each position between the two genders. 2 - When a new person is recruited into the Colonial team, we will analyse to which group of equal value he/she belongs and what the pay gap situation is at that level, as well as other relevant information for that position. The compensation offered will ensure that the pay gap is reduced.
MONITORING AND EVALUATION	Possible changes in the pay gap for positions of equal value will be discussed at the annual monitoring committee.
PERSONNEL TO WHOM IT IS ADDRESSED	All staff
PERSONNEL RESPONSIBLE	Company management
MEANS AND MATERIALS	HR team
COMMUNICATION MECHANISM	In the publication of the company's Equality Plan.

ACTION SHEET	2.
AREA	SALARY POLICY
ACTION	Remedial measure of gender pay gap in an equal-value group
TIMETABLE	Correction from Q3 2022 over the next 4 years
OBJECTIVE	Reduce the gender pay gap in the only group where a difference of slightly more than 25% has been detected.
DESCRIPTION	The salary audit of positions of equal value has determined that there is no salary gap of more than 25% at Colonial. Only in one group is there a gender pay gap, which is on average 25.5% higher for women than for men. In this group, corrective measures will be implemented in the coming years to reduce the gender pay gap within a position group of equal value.
MONITORING AND EVALUATION	
PERSONNEL TO WHOM IT IS ADDRESSED	A group of people within the study of positions of equal value
PERSONNEL RESPONSIBLE	Company management
MEANS AND MATERIALS	HR team
COMMUNICATION MECHANISM	In the publication of the company's Equality Plan.



8.8 OCCUPATIONAL HEALTH

ACTION SHEET	1.
AREA	OCCUPATIONAL HEALTH
ACTION	Analyse whether sick leave has any correlation with the person's gender.
TIMETABLE	From Quarter 3 2022
OBJECTIVE	Analyse the possible causes of a higher number and duration of sick leave among women compared to men.
DESCRIPTION	Colonial has detected in the diagnosis of the equality plan that there is a higher number of sick leaves of longer duration among women than among men in its workforce. An analysis will be made of whether there are causes that the company could have an impact on. To this end, and always ensuring the confidentiality of this type of information, the HR department will carry out an anonymous and aggregated analysis so the causes of the problem can be determined. And if they are related to the work environment, ensure that they are reduced. Psychological support will be offered to those who are on leave due to gender issues.
MONITORING AND EVALUATION	The annual monitoring committee will analyse the data, the evolution of the trend and reflect on measures that can help to reduce the caseload, and then implement them.
PERSONNEL TO WHOM IT IS ADDRESSED	All staff
PERSONNEL RESPONSIBLE	Monitoring and analysis will be carried out within the Equality Plan Monitoring Committee.
MEANS AND MATERIALS	HR team
COMMUNICATION MECHANISM	In the publication of the company's Equality Plan.

ACTION SHEET	2.
AREA	OCCUPATIONAL HEALTH
ACTION	Offer psychological support from pregnancy until the first year of life.
TIMETABLE	From Quarter 3 2022
OBJECTIVE	Continue offering psychological support to workers in their period of maternity/paternity, and help them adapt to the new changes in their lives. Physical, mental, occupational and family changes. The period of the birth of a child implies forming new habits and abandoning others in the lives of the future parents, which are often difficult to manage (e.g. postpartum depression). Adoption and non-pregnancy (abortion) are included.
DESCRIPTION	Reinforcing information and recommendations on the physical activity you can do. This lasts from pregnancy until the child turns one year old. Providing psychological support where needed within the Baby Friendly programme.
MONITORING AND EVALUATION	Annual
PERSONNEL TO WHOM IT IS ADDRESSED	All staff



PERSONNEL RESPONSIBLE	Muriel Moro - Wellbeing Programme -
MEANS AND MATERIALS	The programmes
COMMUNICATION MECHANISM	In the publication of the company's Equality Plan.

8.9 SEXUAL AND GENDER-BASED HARASSMENT

ACTION SHEET	1.
AREA	Sexual Harassment and Bullying
ACTION	Review of the company's existing internal protocol to improve internal awareness and protect the potential victim. And communication of this to all staff.
TIMETABLE	Quarter 3 2022
OBJECTIVE	The internal protocol on Sexual Harassment and Bullying must be sufficiently clear so that anyone who finds themselves in a situation of sexual harassment or bullying knows the communication process and how to act.
DESCRIPTION	 1 - Continue with the revision of the current internal protocol to simplify access for potential victims and guarantee their confidentiality. 2 - Extend support for victims of sexual and moral harassment with psychological support, financed by Colonial. 3 - Communicate to the entire organisation the content of the protocol and the existing mechanisms for reporting and protecting potential victims. 4 - Within the protocol and communication, the composition of the advisory board for this process must be transparent. Their absolute neutrality and confidentiality must be reinforced. For this purpose, the first contact person of the complaint shall be an external person from outside the organisation, to be defined in the protocol and communicated to the staff.
CRITERIA AND REQUIREMENTS FOR THE SEXUAL HARASSMENT AND BULLYING PROTOCOL	The protocol must be sufficiently clear and contain the contact details of the persons on the advisory board, including names, phone numbers and e-mail addresses.
MONITORING AND EVALUATION	Redefinition of the training plan at the end of the plan and communication to staff afterwards. Annual monitoring of possible cases and their resolution.
PERSONNEL TO WHOM IT IS ADDRESSED	All the company
PERSONNEL RESPONSIBLE	Health and Safety Committee.
MEANS AND MATERIALS	Health and Safety Committee and External Prevention Service.
COMMUNICATION MECHANISM	Intranet and email.



ACTION SHEET	2.
AREA	Training to prevent sexual harassment and bullying
ACTION	Actions to prevent sexual harassment and bullying. In order to prevent and avoid them happening.
TIMETABLE	Quarter 4 2022
OBJECTIVE	Internal preventive training actions, in order to prevent cases of sexual harassment and bullying before they occur. And to be able to automatically detect and correct possible existing cases
DESCRIPTION	The company must ensure and prevent harassment in any case. To this end, it will define specific training for both the advisory board team and all staff in this area. The objective is to prevent sexual harassment and/or bullying so that it does not exist in Colonial. The training will also define how to detect possible cases of harassment in the workplace, and how to prevent and avoid them.
MONITORING AND EVALUATION	Definition of the training plan at the end of the plan and communication to staff afterwards.
PERSONNEL TO WHOM IT IS ADDRESSED	All staff
PERSONNEL RESPONSIBLE	Health and Safety Committee.
MEANS AND MATERIALS	Health and Safety Committee and External Prevention Service.
COMMUNICATION MECHANISM	Awareness-raising campaigns, Training, Intranet and Email

ACTION SHEET	3.
AREA	Gender-based violence
ACTION	Contribute to changing the values that underpin and perpetuate gender-based violence in society through philanthropy.
TIMETABLE	Quarter 4 2023
OBJECTIVE	Help in the fight against gender-based violence.
DESCRIPTION	Identify those organisations with which Colonial can collaborate. Sign collaboration agreements with expert organisations on these issues, supporting them from a communication and economic point of view.
MONITORING AND EVALUATION	Six-monthly
PERSONNEL TO WHOM IT IS ADDRESSED	All staff and associations in the fight against gender-based violence.
PERSONNEL RESPONSIBLE	Colonial's management will approve the entities in the sector with which it will collaborate. CSR, HR and Communication will collaborate with the entity.
MEANS AND MATERIALS	Financial budget for partnerships with foundations and organisations.
COMMUNICATION MECHANISM	A communication plan has to be defined that is also in line with the organisation.



8.10 COMMUNICATION, VALUES AND EXTERNAL RELATIONS

ACTION SHEET	1.
AREA	Communication, values and external relations
ACTION	Ensure that all internal and external communication by Colonial is inclusive and does not perpetuate gender stereotypes.
TIMETABLE	From Quarter 4 2022
OBJECTIVE	Colonial wants to train the entire workforce in inclusive language and non- sexist communication in line with its support for equality in the organisation.
DESCRIPTION	Colonial already has internal and external communications that ensure the use of inclusive language and do not perpetuate gender stereotypes, for example through images. And it wants to reinforce this positioning by progressively training all staff to ensure that it will be respected and implemented in all types of communication and channels used by all staff, both internally and externally.
MONITORING AND EVALUATION	Annual review of a sample of internal and external communications to verify that the use of language is compliant and that gender stereotypes are not perpetuated.
PERSONNEL TO WHOM IT IS ADDRESSED	The training will be modular and progressive for all staff, and will be part of the training activities of the equality plan.
PERSONNEL RESPONSIBLE	HR
MEANS AND MATERIALS	Training sessions for all staff and creation of a support manual.
COMMUNICATION MECHANISM	It will be communicated together with the various actions of the equality plan and also as part of the annual training plan for staff.



ACTION SHEET	2.
AREA	Communication, values and external relations
ACTION	Contribute to changing society's values, where the education of girls and boys is not encouraged in the same way.
TIMETABLE	From Quarter 4 2023
OBJECTIVE	Colonial wants to be an agent of change in society and position itself as a company that wants equal education for girls and boys. In particular, it will focus on that training in which one gender is currently under-represented, and which forms part of the positions that Colonial has to cover due to its economic activity.
DESCRIPTION	Colonial will contribute to society by promoting equal economic opportunities for both genders, with a particular focus on the under-represented gender in a profession. The focus will be on careers that Colonial requires and that are under-represented by one gender, as an example: construction, systems and analysis. This will be done through collaborations with third sector organisations that are experts in this area, supporting them from an economic and communication point of view. An analysis will be made of Colonial's needs, of the organisations that can collaborate, their alignment with the organisation, their transparency and the amount and type of contribution. A proposal will then be made to management and the implementation plan will be decided.
MONITORING AND EVALUATION	Define monitoring and impact KPIs with partner organisations and annual analysis.
PERSONNEL TO WHOM IT IS ADDRESSED	Society
PERSONNEL RESPONSIBLE	The Monitoring Committee will make a proposal for collaboration. Colonial's management will approve the entities in the third sector with which it will collaborate.
MEANS AND MATERIALS	Financial budget for partnerships with foundations and organisations.
COMMUNICATION MECHANISM	A communication plan has to be defined that is also in line with the organisation.



9. MONITORING, EVALUATION AND PERIODIC REVIEW SYSTEM

According to the regulations, the actions proposed in the Action Plan will be monitored and evaluated.

In order to carry out an objective assessment and evaluation of the actions of the equality plan, the method to be used is the collection of information from various sources: databases of people, process recording, observation and interviews.

For each action, three possible aspects are evaluated according to the specific objective pursued, using predefined indicators: the result obtained, the process to get there and the impact it has on equal opportunities. Assessments are made at different points in time and always relating the partial result to the point in time at which it is measured in order to anticipate the adjustment or mismatch and to be able to take corrective action if necessary.

The plan's monitoring and evaluation system has been defined and specified:

- 1. Objectives.
- 2. The instruments and tools for collecting information.
- 3. The frequency of monitoring and its main implementation dates.
- 4. The persons responsible for carrying it out.
- 5. The indicators associated with each of the actions.
- 6. The procedure.

Throughout the life of the plan, the implementation of the planned actions will be monitored and a detailed report on the progress of the plan will be drawn up annually. This monitoring and evaluation will be carried out by the Equality Plan Monitoring Committee.

In this case, the same people who have formed the Equality Committee mentioned in point 5 (legal representation of the workers of the organisation and representation of the company) will constitute the Equality Plan Monitoring Committee for the entire duration of the plan (4 years from being signed).

The Committee will generally meet every six months, but during the first year of this Plan the Committee may meet on a quarterly basis in order to carry out special monitoring, which is justified by the start of the measures envisaged here.



10. COMPOSITION AND FUNCTIONING OF THE COMMITTEE IN CHARGE OF MONITORING, EVALUATING AND REVISING THE PLAN.

The composition of the equality plan monitoring committee is defined for the four years of the plan's validity. It is made up of the same people who made up the negotiating committee for the creation of the equality plan.

The committee is the guarantor that the organisation allocates the defined resources to implement the agreed actions.

It also guarantees to communicate to management if there is any non-compliance so that the necessary resources can be reallocated and to continue with the equality plan's correct implementation.

The committee will define how it will operate at its first meeting: how to share progress on the plan, the system for communicating with staff where necessary and their roles if, for example, task rotation is defined.

During the life of the plan, it has been defined to hold at least two meetings to review the plan in order to assess if any modification is required, due to changes in the organisation, teams, implemented actions, results, etc.

Minutes shall be taken for each meeting and signed by all members of the monitoring committee.

11. AMENDMENT PROCEDURE TO ADDRESS POSSIBLE DISCREPANCIES IN THE IMPLEMENTATION, MONITORING, EVALUATION OR REVISION OF THE PLAN.

Any of the parties can request this modification and argue its motivation and impact on the equality plan, and this recommendation must be detailed in the form of an action sheet with each of the aforementioned sections.

In order to be able to modify possible discrepancies in the implementation, monitoring, evaluation or revision of the plan, the entire monitoring committee must be convened and the modification must be approved by consensus.

If the equality plan and/or any relevant action is modified, all staff and/or affected groups must be informed. Arguing the motivation for such a change and how it will positively affect the improvement of equal treatment within the organisation.



THIS DOCUMENT WILL NOT HAVE APPENDICES, BUT THE FOLLOWING DOCUMENTS HAVE TO BE REGISTERED WITH THE PLAN:

- 1. Communication to the Colonial CEO staff of the start of the Equality Plan.
- 2. Act of constitution of the Equality Committee.
- 3. Minutes of approval of the diagnosis.
- 4. Act of approval of the plan's implementation measures.
- 5. Minutes of approval of the equality plan.
- 6. Deed of delegation of the person who will register the plan on behalf of the Equality Commission.
- 7. Internal protocol for action in situations of harassment at work.

