DEEP BIODATA

Gender Equality Plan 2026–2029

Plan period: 2026–2029 | Version 1.0

Document control

Organisation: Deep BioData (Portugal)

Plan period: 2026–2029

Version: 1.0 — proposed for approval

Approval status: This document becomes the company's formally adopted plan only after approval by an authorised management representative.

Plan owner: Chief Executive Officer (CEO), or another senior manager formally designated by management.

Implementation coordinator: A Gender Equality Plan (GEP) Coordinator to be designated by management.

Review: At least annually, with a documented review and update where needed.

Publication: The approved version will be published on Deep BioData's website and communicated internally.

1. Purpose and commitment

Deep BioData is committed to an inclusive and respectful working environment in which people have fair opportunities to contribute, develop professionally, and participate in decision-making. Equality, dignity, and non-discrimination are important to responsible innovation and to the quality of the company's work.

As a Portuguese company developing and contributing to data- and research-related activities, Deep BioData recognises that equality requires practical measures, clear responsibility, appropriate resources, and periodic review. This Gender Equality Plan (GEP) sets out the company's commitments and the actions through which it will pursue them.

Deep BioData's current leadership and ownership structure includes a woman CEO and two shareholders, a woman and a man, each holding 50%. This is relevant organisational context, but it does not by itself establish equality across recruitment, remuneration, career progression, working conditions, or future leadership. The company will apply the principles in this plan as it grows.

This plan is intended to support continuous improvement. It does not claim that the company has already achieved outcomes that have not been measured or verified.

2. Scope and principles

This plan applies to Deep BioData's organisational practices, including recruitment, selection, remuneration, working conditions, professional development, leadership, training, work-life balance, and prevention and handling of discrimination or harassment.

Where relevant, the plan also informs Deep BioData's participation in research and innovation projects, including consortium work related to women's health and pregnancy. Project-specific ethical, clinical, data-protection, and research-integrity obligations remain applicable and are not replaced by this GEP.

- Equal opportunity and non-discrimination in employment and professional participation.
- Fair, transparent, job-related decision-making.
- Respectful communication and a workplace free from harassment and retaliation.
- Proportionate, evidence-informed actions that reflect the company's size and resources.
- Confidentiality and compliance with applicable data-protection law.
- Continuous improvement based on monitoring, feedback, and review.

3. Governance, responsibility, and resources

Senior management is accountable for adopting this plan, communicating its importance, and ensuring that proportionate resources are available for implementation. The CEO may serve as plan owner or appoint another senior manager.

Management will designate a GEP Coordinator. In a small organisation, this responsibility may be combined with another role, provided that the coordinator has sufficient time, access to management, and authority to coordinate the actions and report on progress.

The GEP Coordinator will coordinate the implementation schedule, maintain the action and indicator records, arrange awareness and training activities, review relevant workforce data in aggregated form where appropriate, and prepare an annual progress report for management.

Deep BioData commits to allocating appropriate management time and access to relevant expertise for implementation. Any additional external advice or training will be considered in light of the company's needs, legal obligations, and available resources. The responsible person and allocated arrangements will be recorded in the approved version of this plan.

Employees and collaborators will be informed of the plan and the appropriate channels for raising concerns. Responsibilities under applicable law and individual employment arrangements remain unchanged.

4. Work-life balance and organisational culture

Objective: Support a respectful, inclusive working culture in which work arrangements and caring responsibilities do not create avoidable disadvantages.

Action	Implementation / evidence	Timing / responsibility
Review working arrangements and apply relevant flexibility consistently, where compatible with role requirements and applicable law.	Record the available arrangements and communicate how employees can request them.	Initial review and as needed / management
Promote reasonable workload planning and respectful communication about working time and availability.	Include expectations in management practice and team communications.	Ongoing / managers
Apply applicable family-related and other leave policies fairly and support return-to-work transitions.	Provide clear information on applicable procedures and points of contact.	Ongoing / management
Invite confidential feedback on inclusion and work-life balance where proportionate to the size of the workforce.	Review themes without disclosing individuals' identities.	Annual review / GEP Coordinator

5. Gender balance in leadership and decision-making

Objective: Ensure fair access to leadership, project responsibility, and decision-making opportunities.

Action	Implementation / evidence	Timing / responsibility
Use transparent, role-related criteria when assigning leadership, project coordination, and other responsibilities.	Retain a brief record of criteria and decisions where appropriate.	For each appointment / management
Monitor gender representation in management and other decision-making roles as the company grows.	Include aggregated representation in the annual review when numbers and privacy considerations permit.	Annually / GEP Coordinator
In research consortia, encourage fair opportunities for women researchers to lead work packages and participate in scientific decisions.	Review proposed project roles and leadership distribution during consortium planning.	For each proposal / project lead

6. Gender equality in recruitment and career progression

Objective: Ensure that recruitment, remuneration, evaluation, and professional development are based on relevant skills, experience, responsibilities, and performance.

Action	Implementation / evidence	Timing / responsibility
Use clear, job-related criteria and gender-inclusive language in vacancy notices and recruitment communications.	Review recruitment materials and selection criteria.	For each recruitment / hiring manager
Apply consistent assessment criteria to candidates and avoid assumptions based on gender, pregnancy, parenthood, or caring responsibilities.	Use structured questions or documented assessment criteria where practicable.	For each recruitment / hiring manager
Provide fair access to training, mentoring, promotion, and professional development.	Record opportunities offered and participation where appropriate.	Ongoing; review annually / management
Review pay and role-related compensation criteria for consistency and fairness as workforce size and data allow.	Document the approach and investigate material unexplained differences where a meaningful review is possible.	Annual review / management

7. Gender equality, women's health, and responsible AI research

Deep BioData recognises the importance of rigorous and responsible research in women's health, including research relating to pregnancy. Organisational gender equality and the integration of sex- and gender-related considerations into research are distinct but complementary responsibilities.

Where scientifically relevant to the research question, Deep BioData will consider biological sex, pregnancy-related physiology, gender-related social factors, and relevant differences in access to healthcare. These concepts are not interchangeable, and their relevance will be determined by the scientific context rather than assumed.

- Research design: consider relevant sex- and gender-related factors when defining research questions, variables, cohorts, and analytical methods.
- Data assessment: document dataset provenance, coverage, quality, limitations, and the representation of relevant pregnancy-related populations where this information is available and lawful to use.
- AI evaluation: where data and sample sizes permit, assess performance and limitations across clinically relevant groups and investigate potential systematic disparities.
- Responsible interpretation: document uncertainty, intended use, limitations, and the limits of generalisation; avoid unsupported claims about clinical benefit or performance.
- Interdisciplinary input: seek relevant clinical and domain expertise when defining evaluation criteria and interpreting results.
- Ethics and privacy: follow applicable research ethics, data protection, confidentiality, informed-consent, and clinical governance requirements.

These commitments will be implemented in a manner proportionate to Deep BioData's role in each project. They do not replace the responsibilities of clinical partners, research ethics committees, data controllers, or other accountable parties. Project-specific methods and measures will be documented in the relevant research plans.

8. Prevention of discrimination, harassment, and retaliation

Objective: Maintain a workplace in which people are treated with dignity and concerns can be raised safely.

Discrimination, bullying, sexual harassment, gender-based harassment, and retaliation against a person who raises a concern in good faith are inconsistent with Deep BioData's commitments.

Action	Implementation / evidence	Timing / responsibility
Communicate standards of respectful conduct and non-discrimination.	Make the policy and reporting route available to personnel.	At adoption and onboarding / management
Identify a suitable channel for reporting concerns to management or a designated contact; where a concern involves that contact, provide an alternative route.	Publish contact details internally and explain how concerns will be handled.	At adoption / management
Handle reports sensitively, promptly, impartially, and confidentially to the extent possible and consistent with legal obligations and fair process.	Maintain restricted records and document appropriate follow-up.	As needed / designated handler
Prohibit retaliation against individuals who raise concerns in good faith or participate in a review.	Communicate this protection and assess any reported retaliation.	Ongoing / management

This plan does not replace applicable Portuguese law, employment procedures, or any formal complaints or whistleblowing process that applies to the company.

9. Awareness and training

Objective: Ensure personnel understand the company's equality commitments and that relevant decision-makers can recognise and reduce bias.

Action	Implementation / evidence	Timing / responsibility
Communicate the adopted GEP to all personnel and make it available to new joiners.	Keep a record of communication or acknowledgement where proportionate.	At adoption and onboarding / GEP Coordinator
Provide awareness-raising or training on gender equality, inclusion, and non-discrimination.	Record the activity, date, audience, and participation.	Within the first year after adoption and periodically thereafter / management
Provide training or guidance on unconscious gender bias for personnel involved in recruitment, supervision, evaluation, and decision-making.	Record participation or the guidance provided.	Within the first year after adoption and when relevant staff join / management
Offer role-appropriate guidance on bias and responsible research practices for personnel involved in relevant health-data or AI work.	Include appropriate material in project onboarding or research planning.	As relevant / project leads

10. Data collection, indicators, and monitoring

Deep BioData will use proportionate monitoring to assess implementation and identify areas for improvement. The initial review will establish which indicators can be measured reliably given the company's current size and workforce.

Where lawful and appropriate, workforce data will be analysed in sex-disaggregated or other relevant aggregated form. The company will apply data minimisation, restrict access, and avoid publishing small-number breakdowns that could identify individuals or reveal sensitive information. Data collection will comply with applicable data-protection law and will not infer an individual's gender identity.

Area	Indicator / evidence	Review
Governance	GEP approved, coordinator designated, resources/time identified	At adoption; annual
Recruitment	Recruitment materials and selection criteria reviewed; applicant/outcome data only where lawfully available and meaningful	Per recruitment; annual summary
Career development	Access to training, mentoring, and promotion opportunities reviewed	Annual
Leadership	Gender representation in leadership/project	Annual

	roles, where meaningful and privacy-protective	
Work-life balance	Relevant arrangements communicated; feedback themes reviewed where feasible	Annual
Training	Activities delivered and participation recorded	Annual
Workplace culture	Concerns and feedback reviewed in aggregate without identifying individuals	Annual
Research practice	Relevant projects document sex/gender considerations, data limitations, and bias evaluation where scientifically appropriate	Per project / annual summary

The GEP Coordinator will prepare an annual progress report for management, summarising actions completed, indicators available, barriers encountered, and proposed improvements. Where data are too limited for meaningful statistical analysis, the report will explain the limitation and focus on implementation evidence. The plan will be updated when needed and reviewed at least annually.

11. Implementation schedule

When	Action	Accountable role
On approval	Sign/adopt the plan; appoint the GEP Coordinator; identify management time and implementation resources; publish the approved plan and website summary.	CEO / authorised manager
Within 3 months of approval	Communicate the plan and reporting routes; conduct an initial review of available workforce data and current practices; record the baseline and data limitations.	GEP Coordinator / management
Within 6 months of approval	Review recruitment and selection practices, working arrangements, and the handling of concerns; identify any corrective actions.	Management
Within 12 months of approval	Deliver or arrange appropriate awareness and bias training; complete the first annual progress review and update actions and indicators.	Management / GEP Coordinator
Annually thereafter	Review implementation, indicators, training, concerns-handling arrangements, and relevant research practices; approve updates as needed.	Management / GEP Coordinator
For each relevant research project	Consider sex/gender relevance, data representativeness, appropriate AI evaluation, and clinical/ethical requirements in project planning and reporting.	Project lead / relevant technical and clinical leads

12. Review, communication, and approval

The GEP Coordinator will maintain the current version and present an annual review to management. Management will decide and record any changes, taking into account implementation evidence, changes in the workforce, legal or funding requirements, and lessons from relevant projects.

The approved plan will be published on the Deep BioData website and communicated internally. A public summary may be provided on the website, with a direct link to the full plan. The full approved document will remain publicly accessible.

This plan takes effect on the date of formal approval. Before approval, it is a draft and should not be represented as an adopted or fully implemented policy.

Approved by: ___Stella Luna de Maria_____

Position: _____CEO_____

Signature: _____  _____

Date of approval: _____27/10/2026_____

GEP Coordinator / contact: _____

Official contact email: _____stella.ldm@deepbiodata.com_____

Reference framework

This plan is informed by the European Commission and European Institute for Gender Equality guidance on Gender Equality Plans under Horizon Europe, including the four process-related requirements and recommended thematic areas. The applicability of the formal Horizon Europe GEP eligibility criterion must be confirmed against Deep BioData's legal status and the specific call conditions.

Official references:

- European Commission, Gender equality in research and innovation: https://research-and-innovation.ec.europa.eu/strategy/strategy-research-and-innovation/democracy-and-rights/gender-equality-research-and-innovation_en
- European Institute for Gender Equality, Horizon Europe GEP eligibility criterion: https://eige.europa.eu/gender-mainstreaming/toolkits/gear/horizon-europe-gep-criterion
- EIC Pathfinder Challenges 2026, including DeepRAP: https://eic.ec.europa.eu/eic-funding-opportunities/eic-pathfinder/eic-pathfinder-challenges-2026_en

Appendix A — Suggested website summary

Our commitment

Deep BioData is committed to promoting equal opportunities, respect, and inclusion across its organisation and research activities. We aim to provide a working environment in which people can contribute, develop professionally, and participate in decision-making without discrimination.

Our Gender Equality Plan (GEP) sets out practical actions relating to recruitment and career development, leadership, work-life balance, training, prevention of harassment, and monitoring.

Equality in research and innovation

As a company involved in data-driven research and innovation, Deep BioData recognises the importance of responsible and scientifically rigorous research. Where relevant to the research question, we aim to consider sex- and gender-related factors, data representativeness, and potential bias in AI systems. For research concerning women's health and pregnancy, these considerations should be addressed alongside clinical expertise, research ethics, and data protection.

Implementation and accountability

The plan assigns responsibility for implementation, establishes proportionate monitoring and training activities, and provides for regular management review. Deep BioData will review progress and update the plan as the company and its activities develop.

Read the full plan

Download the Deep BioData Gender Equality Plan 2026–2029 (PDF).

The full plan describes our objectives, actions, responsibilities, indicators, implementation schedule, and review arrangements.

The plan will be published as an adopted company policy after formal management approval. Please use the approved and signed version for publication.