

EQUALITY PLAN

2018-2023



III. ADDITIONAL PROVISIONS**MINISTRY OF EMPLOYMENT AND SOCIAL SECURITY**

6273 *Decision of April 24th, 2018, of the Directorate-General for Employment, registering and publishing the Equality Plan of Sidenor Aceros Especiales, SL, Sidenor Investigación y Desarrollo, SA and Sidenor Forgings & Castings, SL.*

Having regard to the Equality Plan of Sidenor Aceros Especiales, SL, Sidenor Investigación y Desarrollo, SA and Sidenor Forgings & Castings, SL (Agreement Code no.: 90100992112018), which was signed on March 20th, 2018 by, on the one hand, the representatives of the Management of the above-mentioned business group and, on the other hand, by the unions UGT, ESK, CCOO, USO and CSI-F, on behalf of the workers, as set out in Article 90 (2, 3) of the Spanish Law on the Statute of Workers, recast text approved by Royal legislative Decree 2/2015 of October 23th and Royal Decree 713/2010 of May 28th, on the registration and deposit of collective labour agreements,

The Directorate-General for Employment rules the following:

First.

Order the registration of the aforesaid Equality Plan in the corresponding Register of collective labour agreements through the electronic media of this Management Body, with a notification thereof to the Negotiation Committee.

Second.

Arrange for its publication in the «Official State Gazette».

Madrid, April 24th, 2018 – Director-General for Employment, Xavier Jean Braulio Thibault Aranda.

EQUALITY PLAN OF SIDENOR, SIDENOR ACEROS ESPECIALES, S.L.U., SIDENOR INVESTIGACIÓN Y DESARROLLO, S.A., SIDENOR FORGINGS & CASTINGS, S.L.

2018-2023

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**EQUALITY PLAN OF SIDENOR,
SIDENOR ACEROS ESPECIALES, S.L.U.,
SIDENOR INVESTIGACIÓN Y DESARROLLO, S.A.,
SIDENOR FORGINGS & CASTINGS, S.L.
2018-2023**

1. INTRODUCTION

The principle of equality is recognized both internationally and in our own state legislation. Specifically, Article 14 of the Spanish Constitution proclaims the right to equality and non-discrimination on grounds of gender. Likewise, Organic Law 3/2007 of March 22 on effective equality between women and men (hereafter, "OLE") aims at implementing the right to equal treatment and opportunities between women and men, in particular by eliminating discrimination against women in all spheres of life.

Sidenor Aceros Especiales, S.L.U., Sidenor Investigación y Desarrollo, S.A. and Sidenor Forgings & Castings, S.L. (hereinafter, "the Company" or "SIDENOR") fully concur with this principle of equality between women and men. Hence, given the current lack of parity and as a next step in the commitment adopted in this matter, the Company has performed a Diagnosis of the situation (hereinafter, "the Diagnosis"), enabling the implementation of this new Equality Plan, which is adapted to the current situation of the Company and includes concrete measures targeted at helping achieve this objective.

To this end, and as a preliminary step, an Equality Commission has been created, which has taken part in the validation of the Diagnosis as well as the drafting and implementation of this new Equality Plan.

The following areas were analysed within the framework of the Diagnosis:

- Culture of equality between men and women.
- Situation of women and men in the organisation.
- Access to the organisation and length of service.
- Professional promotion and development.
- Continuous training.

- Organisation of working time and work-life balance.
- Occupational health.
- Internal and external language and communication.

The conclusions drawn in each mentioned research area set the starting point of the objectives and measures which shall be implemented within the framework of the Equality Plan.

2. GENERAL PROVISIONS OF THE EQUALITY PLAN

2.1 Signing parties

This Equality Plan is signed by the members of the Equality Commission, which was created on February 10th, 2017 and consists of the following members:

On behalf of the Unions:

Mr José Antonio Jainaga
Mr Roberto Alonso Mrs Cristina López
Mr Sergio Gutiérrez
Mrs Elena Iriondo
Mrs Amagoia Abalos
Mr Cruz Alberdi

On behalf of the Unions:

On behalf of CCOO: Mr Juan Carlos Gutiérrez, Mr Antonio Martínez, Mr Miguel Pascual Reimúndez, Mr Luis Alberto Jiménez, Mr Julián Macho, Mr Juan Carretero.

On behalf of UGT: Mrs Montserrat Río, Mrs Begoña García, Mr José Luis Balciscueta, Mr José Ramón Manso, Mr Sergio Colmenero, Mr David Rodríguez.

On behalf of USO: Mr Fernando Rey, Mr Víctor Sánchez.

On behalf of CSIF: Mrs Marta del Barrio, Mr Javier Cayón.

On behalf of ESK: Mr Gorka Sierra, Mr José Ángel Becerra.

2.2 Purpose of the Equality Plan

The Equality Plan aims at ensuring that the principle of equal treatment and opportunities between women and men is duly respected by all members of the Company and that a better equality is promoted in this matter.

The general and, subsequently, specific objectives of the Plan are based on the results obtained from the Diagnosis of the situation with regard to equal opportunities.

2.3 Territorial scope

According to the provisions of Article 46.3 of the OLE, the Plan shall apply to the entire Company, therefore not only including the current workplaces which are part of it, but also other workplaces which might become part of it in the future.

Observance of the provisions set out in the Equality Plan is mandatory and general for all workers of the Company, regardless of their type of contract or position.

2.4 Temporal scope

The Equality Plan is adjustable and proactive; its measures shall be based on principles of reasonableness and proportionality and adapted to the specific situation of the Company at any time.

For this purpose, this Plan shall be in force for a period of five years, from its signature and entry into force on March 20th, 2018, until March 20th, 2023, and may be extended until a new Plan is signed.

For the purpose of prioritizing and establishing a schedule for the application of the different measures provided for in the Plan, the model of a “timetable of actions” which shall be developed by the Follow-Up Committee for the Equality Plan is attached as Annex II.

Once the above-mentioned end date has been reached, the parties shall assess the relevance of elaborating a new plan which shall be adapted to the development observed in the Company. If no new plan has been signed by the above-mentioned date, the Plan shall be deemed to be extended automatically until a new plan is signed.

Notwithstanding the above, the promotional measures that may be established, if appropriate, shall be conditional upon the period of time that is strictly necessary in order to eradicate or rectify the discriminatory or unbalanced situation they intend to eliminate. The disappearance or decrease in intensity of these situations shall entail the elimination or mitigation of the relevant measure.

3. GENERAL OBJECTIVES OF THE EQUALITY PLAN

The Equality Plan of SIDENOR aims at implementing a set of measures, once areas for improvement in terms of equal opportunities between women and men have been identified in the Diagnosis, in order to achieve effective equality in the Company. These measures shall be based on a set of general objectives such as:

- Include equality among the strategic objectives of the Company.
- Prevent and, where necessary, eliminate any expression, factual situation, business conduct or action which undermines, or could undermine, the full implementation of the principle of effective equality between women and men, as well as of any direct or indirect gender-based discrimination in the Company.
- Integrate the gender perspective in the Company management.

- Correct potential gender imbalances in various areas.
- Raise awareness and train the entire organisation on the principle of equal opportunities between men and women.
- Promote the use of non-sexist language in all areas.
- Facilitate the reconciliation of personal, family and work life for workers of SIDENOR and promoting co-responsibility between men and women.
- Ensure equality in all future recruitment processes.
- Establish criteria in favour of subcontracting companies which promote equality.
- Sign the Annex on the commitment to non-discrimination towards providers.

4. SPECIFIC OBJECTIVES OF THE PLAN AND NECESSARY MEASURES

The following is a summary of the areas for improvement identified in the Diagnosis in each analysed field as well as, in accordance with the general objectives set out in the previous section, a number of more specific objectives and the measures to be implemented for the proper correction of the identified deficiencies.

4.1 Commitment to equality

4.1.1 Main areas for improvement

A number of areas for improvement related to the Company's commitment to equal opportunities between women and men have been identified in the Diagnosis:

Although the Company has expressed its commitment to equal opportunities between women and men during meetings, this commitment is neither

available on the intranet of the Company, nor communicated to third parties (on its website, for example).

No comprehensive training on equal opportunities has been performed.

4.1.2 First specific objective and measures for its implementation

Objective:

Internal and external diffusion of the commitment of the Company to the principle of equal opportunities between women and men and the implementation of an Equality Plan.

Measures, deadlines and entities in charge of the implementation:

For the purpose of achieving the intended objective, the following measures are established:

MEASURE	DEADLINE	RESPONSIBLE ENTITY
Providers and customers shall be informed about the Company's commitment to equality by means of its inclusion in the corporate webpage.	2018-2023	IT department. Purchases and supplies department.
Notice boards and the intranet shall serve as vehicles of communication for the actions carried out so far in terms of equality, all subsequent actions as well as any legislative modification in this matter or any modification of the Plan.	2018-2023	Human Resources department. IT department.

4.1.3 Second specific objective and measures for its implementation

Objective:

Raise the staff's awareness of the importance of the principles of equality and non-discrimination.

Implementation measures and deadlines:

For the purpose of achieving the intended objective, the following measures are established:

MEASURE	DEADLINE	RESPONSIBLE ENTITY
Inclusion of the gender perspective in training actions.	2018-2023	Human Resources department.
The candidate or new recruit shall be informed about the Company's commitment to equality during the selection process as well as the induction process, respectively.	2018-2023	Human Resources department.
The participation of the staff to training courses on equal opportunities shall be encouraged.	2018-2023	Human Resources department.
The gender perspective shall be considered during staff meetings.	2018-2023	Middle managers during meetings with their respective teams.

4.2 Situation of women and men in the Company

4.2.1 Main areas for improvement

The following main areas for improvement with regard to the situation of women and men in the Company have been identified in the Diagnosis:

The number of women in the staff is lower than the number of men.

With regard to the hierarchical distribution of staffing levels, a distinction needs to be made between General Offices and R&D, on the one hand, and the rest of the staff, on the other hand:

In General Offices and R&D, the distribution of men and women is more balanced than in the rest of the Company.

At higher hierarchical levels, the proportion of women, although they remain underrepresented, is higher than at Company level.

As for the rest of the staff, inequality between men and women remains high.

No parity can be observed either with regard to the situation per professional groups, whereas inequality is distributed as follows: (i) men prevail in groups whose tasks are directly related to manufacture activities; (ii) women prevail in more administrative positions; (iii) there is a greater degree of balance in intermediary professional groups and (iv) men prevail in positions of greater responsibility.

The situation is similar at work centre level (the inequality identified at Company level remains).

4.2.2 First specific objective and measures for its implementation

Objective:

Promote the recruitment of the underrepresented gender in the relevant department and/or professional groups where greater inequality is observed.

Implementation measures and deadlines:

For the purpose of achieving the intended objective, the following measures are established:

MEASURE	DEADLINE	RESPONSIBLE ENTITY
An information system on current vacant positions in the Company, which favours the presentation of internal applications, shall be established.	2018-2023	Human Resources department.

4.2.3 Second specific objective and measures for its implementation

Objective:

Favour the presence of women in positions of responsibility. Implementation measures and deadlines:

For the purpose of achieving the intended objective, the following measures are established:

MEASURE	DEADLINE	RESPONSIBLE ENTITY
The application of women for internal vacant positions or professional promotion processes shall be promoted by raising awareness among the current staff.	2018-2023	Human Resources department and head of department of the new recruit.

4.3 Access to the organisation and length of service

4.3.1 Main areas for improvement

The following main areas for improvement with regard to recruitment by the Company and length of service have been identified in the Diagnosis:

The Company does not undertake any positive action regarding the access of women to employment such as, for example, prioritizing them in the recruitment for positions and professional groups in which their presence is lower (and vice versa).

The persons involved in the selection processes have not received any training regarding equal opportunities⁽¹⁾.

⁽¹⁾ *This aspect will also be taken into consideration in the Section on professional training, although this Section also includes a specific measure, in view of the relevance of the issue.*

The recruitment of men has been higher than the recruitment of women at any time.

With respect to recruitment per professional group, most recruitments of women are intended for administrative positions which, a priori, are not directly related to the industrial work of factory production.

As for men, most recruitments concern groups related to factory production activities.

New recruitments in higher professional groups (intermediate qualification or higher) are predominantly men at almost every level, except for some isolated exceptions.

4.3.2 First specific objective and measures for its implementation

Objective:

Promote the submission of applications by the underrepresented gender, according to the position to be covered.

Implementation measures and deadlines:

For the purpose of achieving the intended objective, the following measures are established:

MEASURE	DEADLINE	RESPONSIBLE ENTITY
Extend recruitment sources and communication channels regarding possible offers so as to promote greater parity in the submitted applications (including territorial public employment services).	2018-2023	Human Resources department.
Strengthen contacts with education centres, schools and universities so as to encourage recruitment.	2018-2023	Human Resources department.
Inclusion of an application for the submission of candidatures in the corporate webpage as well as the intranet.	2018-2023	Human Resources department.

4.3.3 Second specific objective and measures for its implementation

Objective:

Ensure that the selection process is as neutral as possible by removing any question related to the personal circumstances of the worker during interviews or selection tests.

Implementation measures and deadlines:

For the purpose of achieving the intended objective, the following measures are established:

MEASURE	DEADLINE	RESPONSIBLE ENTITY
The interviews shall not include any question related to the personal circumstances of the candidates (age, civil status, dependent children, etc.).	2018-2023	Human Resources department.

MEASURE	DEADLINE	RESPONSIBLE ENTITY
Provide the persons that participate in the selection process (Human Resources staff well as heads of the departments involved in the process) with training in equality.	2018-2023	Human Resources department.
Work towards equal representation in the selection teams.	2018-2023	Human Resources department.

4.4 Professional promotion and development

4.4.1 Main areas for improvement

The following areas for improvement have been identified in the Diagnosis:

There is no promotion committee in the Company; promotion decisions are taken by the heads of the relevant departments together with a member of the department of Human Resources.

Most positions of greater responsibility are held by men. No preliminary analysis is made of the workers who might potentially apply for the position to be covered, in particular workers of the underrepresented gender, who might be promoted. As a result, the Company does not consider the underrepresented gender when it decides on professional promotion among equally prepared candidates⁽²⁾.

⁽²⁾ This aspect will also be taken into consideration in the Section on professional training, although this Section also includes a specific measure, in view of the relevance of the issue.

No specific training in equality is provided to the persons involved in professional promotions. This aspect will be analysed in the Section related to professional training.

4.4.2 First specific objective and measures for its implementation

Objective:

Improve and provide conditions for professional promotion.

Implementation measures and deadlines:

For the purpose of achieving the intended objective, the following measures are established:

MEASURE	DEADLINE	RESPONSIBLE ENTITY
Inform about vacant positions (by means of their inclusion in the intranet, notice board, monthly emails to the staff, etc.)	2018-2023	Human Resources department.
Encourage the participation of employees in internal promotion processes in cooperation with the managers of the area.	2018-2023	Human Resources department and head of department of the new recruit.
Promote the possibility for people to communicate their wish for promotion/development.	2018-2023	Human Resources department and head of department of the new recruit.

MEASURE	DEADLINE	RESPONSIBLE ENTITY
Garantizar que los trabajadores/as que hayan estado en situación de excedencia por guarda legal o suspensión del contrato por maternidad, paternidad o lactancia natural pueda participar en los procesos de promoción profesional.	2018-2023	El Departamento de Recursos Humanos y el responsable del departamento en el que se produzca la incorporación.

4.4.3 Second specific objective and measures for its implementation

Objective:

Encourage professional promotion as a channel for parity increase.

Implementation measures and deadlines:

For the purpose of achieving the intended objective, the following measures are established:

MEASURE	DEADLINE	RESPONSIBLE ENTITY
Encourage the participation of women and men in training actions when they are not included in professional activities over long periods of time (parental leaves, maternity leaves, etc.)	2018-2023	Human Resources department and all persons involved in the development of training programmes.
Provide specific training which allows for professional promotion and functional mobility.	2018-2023	Human Resources department and head of department of the new recruit.

4.5 Continuous training

4.5.1 Main areas for improvement

The following main areas for improvement with regard to the training intended for the staff have been identified in the Diagnosis:

The possibility for workers who are on leave on grounds of legal custody or on family leave to have access to the provided training so as to ease their subsequent reintegration or recycling once they have come back to work has not been contemplated (nor has it been requested so far)⁽³⁾.

⁽³⁾ *This aspect will also be taken into consideration in the Section on professional promotion, as a measure aimed at encouraging promotion, in particular of women, although this Section includes a specific measure in view of the relevance of the issue..*

The participation of women in training actions in the departments or professional categories where they are underrepresented (and vice versa) is not specifically promoted. The training related to professional licenses is an example of this.

4.5.2 First specific objective and measures for its implementation

Objective:

Sensitize and train the entire staff on equal opportunities, in particular the personnel related to Company organisation, so as to ensure equality between men and women as well as objectivity in all processes.

Implementation measures and deadlines:

For the purpose of achieving the intended objective, the following measures are established:

MEASURE	DEADLINE	RESPONSIBLE ENTITY
<p>Provide training in equal opportunities between women and men, as well as in prevention of harassment for, in priority: (i) members of the Follow-up Commission on Equality, (ii) the persons involved in selection processes, and (iii) the persons involved in professional promotion with the support, if deemed necessary in each case, of each territory's resources.</p>	<p>2018-2023</p>	<p>Human Resources department.</p>
<p>Gradually inform the entire staff about equal opportunities between women and men as well as harassment prevention.</p>	<p>2018-2023</p>	<p>Human Resources department and head of department of the new recruit.</p>
<p>Provide the entire staff with a copy of the Equality Plan and display a copy on the intranet as well as in other corporate media.</p>		<p>Human Resources department.</p>
<p>Review the training plan from a gender perspective, so as to avoid any sexist connotation or stereotype and prevent gender-based discrimination.</p>		<p>Human Resources department.</p>

4.5.3 Second specific objective and measures for its implementation

Objective:

Facilitate a balanced access of women and men to training specialities which contribute to their professional development in the Company.

Implementation measures and deadlines:

For the purpose of achieving the intended objective, the following measures are established:

MEASURE	DEADLINE	RESPONSIBLE ENTITY
Inclusion of the training plan in the corporate intranet.	2018-2023	Human Resources department. IT department.
Online training shall be encouraged, provided that it is officially approved.	2018-2023	Human Resources department.
Workers shall be encouraged to suggest specific training subjects for the exercise of their functions, their professional promotion or their functional mobility.	2018-2023	Human Resources department.
Create an application or a system enabling workers to express their wish to join trainings or request the inclusion of new courses in the yearly training plan.	2018-2023	Human Resources department. IT department.
Provide specific training that enables professional promotion and functional mobility.	2018-2023	Human Resources department.

4.5.4 Third specific objective and measures for its implementation

Objective:

Encourage the participation of women in training actions when they do not take part in professional activities over long periods of time.

Implementation measures and deadlines:

For the purposes of achieving the intended objective, as agreed upon in the previous Section on professional promotion, workers who are on a short leave or on a leave of absence with job security shall be included in the training actions carried out in the Company.

MEASURE	DEADLINE	RESPONSIBLE ENTITY
Encourage the participation of women and men in training actions when they do not take part in professional activities over long periods of time (leaves on grounds of legal custody, maternity, etc.).	2018-2023	Human Resources department and all persons involved in the development of training programmes.
Include a retraining course after reintegration following a leave on grounds of legal custody or a suspension of the contract over a long period of time (temporary disability, maternity, etc.) so as to allow for a fast updating of the worker on the novelties of the position, if necessary.	2018-2023	Human Resources department.

4.6 Organisation of working time and work-life balance

4.6.1 Main areas for improvement

The following main areas for improvement with regard to work-life balance have been identified in the Diagnosis:

The analysis performed on the distribution of staff according to weekly working hours shows that part-time work or reduced working times of 20 to 40 hours are usually more often performed by women than by men, owing to the fact that women combine work with childcare more often than men.

No measures are carried out which might help families who have children with disabilities in their direct care.

No attempt is made to align the schedule of couples who serve at the same work centre of the Company, are subject to a shift work regime and have minor children.

4.6.2 First specific objective and measures for its implementation

Objective:

Facilitate the exercise of reconciliation rights.

Implementation measures and deadlines:

For the purpose of achieving the intended objective, the following measures are established:

MEASURE	DEADLINE	RESPONSIBLE ENTITY
The staff shall be informed about the reconciliation rights of the workers by means of their publication on the notice board of the Company, the intranet and any other usual communication means.	2018-2023	Human Resources department.

MEASURE	DEADLINE	RESPONSIBLE ENTITY
The Company shall examine the cases of exceptional specific circumstances stated by the workers.	2018-2023	Human Resources department.
Inform about the fact that the professional career development or promotion opportunities of those who make use of their rights related to work-life balance (permissions, reduced working hours, etc.) shall not be negatively affected.	2018-2023	Human Resources department.

4.6.3 Second specific objective and measures for its implementation

Objective:

Encourage the appropriate balance and compatibility between work responsibilities and personal as well as family life and promote co-responsibility.

Implementation measures and deadlines:

For the purpose of achieving the intended objective, the following measures are established:

MEASURE	DEADLINE	RESPONSIBLE ENTITY
Carry out information and awareness-raising campaigns, specifically targeted at men, on co-responsibility and balanced division of tasks.	2018-2023	H u m a n R e s o u r c e s department.

MEASURE	DEADLINE	RESPONSIBLE ENTITY
Specifically prioritize, among transfer requests, cases that favour the reconciliation of work and family life, such as family reunification.	2018-2023	H u m a n Resources department.
<p>Compatible working hours for couples with children in the Company: SIDENOR workers who are subject to a shift work regime at the same work centre and live with their minor children shall have the opportunity, while keeping their shift work regime, to ask for compatible work shifts, so as to avoid simultaneous working time of both parents and allow at least one of them to take care of the minor child.</p> <p>The justified request shall be submitted jointly by the workers to the Human Resources department, as this department is competent to grant this condition for concurrent organisational or production reasons.</p> <p>Once authorisation is given, the Company may adopt the appropriate organisational measures in order to ensure adequate service in the departments or areas the applicants attached to.</p>	2018-2023	H u m a n Resources department.

MEASURE	DEADLINE	RESPONSIBLE ENTITY
<p>Permission of 16 hours per year (in blocks of 4 hours) which can be made up until the first trimester of the following year for accompanying children aged less than 14 to the paediatrician or any other medical specialist, without any limit of age for children with a recognised and duly certified disability. This authorisation may also apply to dependent parents or children in legally justified dependency situation.</p> <p>The justified request shall be submitted jointly by the workers to the Human Resources department, as this department is competent to grant this condition for concurrent organisational or production reasons.</p> <p>A medical certificate including entrance and departure time shall be delivered within the 48 ensuing hours. Once authorisation is given, the Company may adopt the appropriate organisational measures in order to ensure adequate service in the departments or areas the applicant is attached to.</p>	2018-2023	Human Resources department.

<p>This authorisation can be made up until the first trimester of the following year, at the request of the Company, with prior notice of 5 days and in full days, unless no amount equivalent to one full day is available by the end of the year, in which case the existing period of time shall be regularised.</p>	2018-2023	Human Resources department.
<p>Aid for the direct care of the physically and/or mentally disabled: SIDENOR workers who directly take care of children aged under 18 with a disability recognised by the relevant public authority of, at least, 33%, who are not entitled to social benefits or benefits provided by any other public authority and who do not carry out any gainful professional activity shall receive a yearly special aid for the following amount:</p> <ul style="list-style-type: none"> - between 33% and 65%: €200 per year. - 65% or more: €600 per year. <p>The Company reserves the right to increase these amounts up to €3,000 per year in case of exceptional need.</p> <p>The workers shall make the request and provide evidence of their entitlement to this aid, which cannot be added to other aids.</p>	2018-2023	Human Resources department.

MEASURE	DEADLINE	RESPONSIBLE ENTITY
<p>Aid for the care of minor children suffering from severe diseases as set out in the Royal Decree 1148/2011 of July 29.</p> <p>The workers who take care of minors suffering from cancer or any other severe disease described in the list of diseases set out in the above-mentioned decree and work full time are entitled to receive the aid.</p> <p>The workers shall make the request and provide evidence of the situation.</p> <p>After analysing the evidenced situation, the Company shall establish an annual special aid over the period it determines.</p> <p>The financial amount shall not be general, but individual, according to the circumstances of each worker, with a maximum amount of €12,000.</p>	2018-2023	Human Resources department.

4.7 Occupational health

4.7.1 Main areas for improvement

The following areas for improvement with regard to occupational health have been identified in the Diagnosis:

The Company does not explicitly include equality between women and men in its health and safety objectives.

Occupational risk assessments take the gender perspective into account and include the aspects mentioned in the prevention legislation, which are related to pregnant workers.

No improvements on the legal framework with regard to gender-based violence are contemplated.

4.7.2 First specific objectives and measures for its implementation

Objective:

Integrate the gender perspective in occupational risk prevention.

Implementation measures and deadlines:

For the purpose of achieving the intended objective, the following measures are established:

MEASURE	DEADLINE	RESPONSIBLE ENTITY
Elaborate a protocol of action of the Company in cases of risk due to pregnancy, provide the staff with a copy of the protocol and keep another copy available at any time (intranet, notice board, etc.).	2018-2023	Occupational risk prevention service.
Integrate the gender perspective in the elaboration of the Prevention Plan, the Emergency Plan, in health surveillance as well as in any other documentary obligation referring to occupational risk prevention.		Occupational risk prevention service.

4.7.3 Second specific objective and measures for its implementation

Objective:

For purposes of prevention, distribute the code on sexual harassment and harassment based on sex.

Implementation measures and deadlines:

For the purpose of achieving the intended objective, the following measures are established:

MEASURE	DEADLINE	RESPONSIBLE ENTITY
Provide the entire staff and each new employee of the Company with the harassment prevention code.	2018-2023	Human Resources department.
Upload on the intranet and other corporate media a copy of the harassment prevention code.	2018-2023	Human Resources department.

4.7.4 Third specific objective and measures for its implementation

Objective:

Guarantee the legal rights of workers who are the victims of gender-based violence.

Implementation measures and deadlines:

For the purpose of achieving the intended objective, the following measures are established:

MEASURE	DEADLINE	RESPONSIBLE ENTITY
Include an information course on the rights of workers who are the victims of gender-based violence in the training plan.	2018-2023	Human Resources department. Occupational risk prevention department.

MEASURE	DEADLINE	RESPONSIBLE ENTITY
Spread information about the preferential right of those who are the victims of gender-based violence to occupy any vacant position in another work centre.	2018-2023	Human Resources department.
Review and, if necessary, adapt the harassment prevention code.	2018-2023	Equality Commission.
Anyone who is the victim of gender-based violence and, by virtue of a final court ruling, is constrained to leave his/her working position in the locality where he/she provided his/her services and move to another work centre of Sidenor shall be entitled to receive financial support as a contribution to removal expenses.	2018-2023	Human Resources department.

4.8 Internal and external language and communication

4.8.1 Main areas for improvement

The following areas for improvement with regard to the language and communication used in the Company have been identified in the Diagnosis:

In most cases, the language used by the Company is neutral, in internal as well as external communications. In some cases, however, communications do not refer to both sexes.

In terms of internal communication, no regular staff information meetings are organised. Meetings with the Works Committee are organised only when deemed relevant.

Internal communication means are not used for the purposes of promoting equal opportunities and raising awareness among workers with respect thereto.

As for external communication (which differs from the publication of vacancy notices), that is, towards customers and providers, no reference is made to equal opportunities between women and men.

The Company website does not display any section on corporate social responsibility or the principle of equal opportunities.

4.8.2 First specific objective and measures for its implementation

Objective:

Ensure the promotion of an image of equality between women and men by means of internal communication.

Implementation measures and deadlines:

For the purpose of achieving the intended objective, the following measures are established:

MEASURE	DEADLINE	RESPONSIBLE ENTITY
Review and rectify, if necessary, the language and images used in internal communications: intranet, notice board, etc., so as to make them neutral.	2018-2023	Human Resources department.
Review and rectify, if necessary, the language used in the webpage, so as to make it neutral.	2018-2023	Human Resources department.

Produce a non-sexist language guide that shall apply to all internal and external communications.	2018-2023	Human Resources department.
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4.8.3 Second specific objective and measures for its implementation

Objective:

Establish information channels on equal opportunities in the Company.

Implementation measures and deadlines:

As the measures set out in the Section on the commitment to equality are appropriate for achieving the intended objective, their implementation should therefore enable the fulfilment of this objective as well.

5. Available means and resources for implementing the Equality Plan

The implementation and proper development of the Equality Plan requires the allocation of adequate financial resources in order to ensure the introduction of the measures provided therein. The Company is aware of this aspect and commits to making the necessary means available for the effective implementation of the Equality Plan and to providing the material, financial, personnel or other resources, among which are the following:

- Dedication of the members of the Equality Commission to the very duties of evaluating and monitoring the measures set out in this Plan as well as the degree of fulfilment of the defined objectives and any other modification of the Plan which might happen to be necessary or useful in the future.
- A meeting room in the Company facilities shall be made available for the Commission meetings.

- Allocation of financial resources aiming at improving the current equality conditions.

This list is not completely closed. The Company shall therefore be able to strengthen, adapt or extend the above-mentioned means, on grounds of solvency, financial capacity and priority for achieving the objectives, according to the implementation development of the measures established in the Equality Plan of Equality and to possible circumstances that could arise.

Similarly, the Company shall provide the workforce or material means and resources that are necessary for achieving the objectives with respect to each field of action set out in the Plan.

6. Evaluation and monitoring system of the Equality Plan

The Commission shall establish, within the framework of the Equality Plan, an efficient system for the evaluation and monitoring of the objectives set out therein.

The Equality Commission (consisting of one (1) member of each signatory Union and the same total number on behalf of the Company Management – without prejudice to the right of the parties to agree, in view of exceptional circumstances, to request a higher number of attendees –) shall be in charge of monitoring the adoption of the measures defined in this Equality Plan and assessing the degree of fulfilment of the objectives set out for each field of action, as described in the previous Section.

For these purposes, the Equality Commission shall meet every six months, or exceptionally, when so agreed by the parties, within no more than 30 days, whereby each meeting shall be duly acted upon, as agreed in the constitution charter of February 10, 2017.

Once the evaluation has been carried out, the Commission shall complete the monitoring sheets intended for this purpose (Annex I), which include the necessary data for adequate monitoring. In particular, the data to be indicated in the sheets shall include the following:

- Specific objective intended.
- Corrective or promotional measures implemented for its fulfilment.
- Specific means or resources implemented.
- Measure implementation date.
- Any other circumstance worth mentioning (observed progress or improvements, obstacles, degree of success, effectiveness of the measure, unexpected events arising, etc.).

The evaluation and follow-up of the Plan shall aim at assessing and monitoring the implementation of the suggested measures, for the following purposes:

- Monitoring effectively implemented measures as well as measures that are still to be implemented.
- Identifying possible obstacles in their implementation, so as to rectify or modify the strategy.
- Performing an adequate analysis of the changes incurred.
- Detecting new needs and improvement suggestions.

This Equality Plan is signed and ratified by the following members of the Equality Commission:

On behalf of the Company:

Mr José Antonio Jainaga

Mr Roberto Alonso Mrs Cristina López Mrs Elena Iriondo Mrs Amagoia Ábalos

Mr Cruz Alberdi

Mr Sergio Gutiérrez

On behalf of UGT:

Mrs Montserrat Río

Mrs Begoña García

Mr Sergio Colmenero

Mr David Rodríguez.

Mr José Luis Balciscueta

Mr José Ramón Manso

On behalf of CC.OO.:

Mr Juan Carlos Gutiérrez

Mr Antonio Martínez

Mr Miguel Pascual Reimúndez

Mr Juan Carretero

Mr Luis Alberto Jiménez

Mr Julián Macho

On behalf of USO:

Mr Fernando Rey

Mr Víctor Sánchez

On behalf of CSIF:

Mrs Marta del Barrio

Mr Javier Cayón

On behalf of ESK:

Mr Gorka Sierra

Mr José Ángel Becerra

ANNEX I

Model sheet for evaluating and monitoring the Equality Plan implementation

EVALUATION AND MONITORING					Sheet 1
Materia: []					
Objective	Corrective measure	Resources used	Date of implementation	Responsible entity	Comments

Working towards equality

