

ON-AIR Consulting & Solutions S.r.l.

Gender Equality Plan (GEP)

2026–2029

1. Purpose and Scope

1.1 Purpose

This Gender Equality Plan (GEP) defines the commitment of ON-AIR Consulting & Solutions S.r.l. (hereinafter "ON-AIR") to promote equal opportunities, fairness, diversity and inclusion throughout all areas of its activities.

As a company operating in the aerospace, defence and advanced engineering sectors, ON-AIR recognises that innovation, technical excellence and competitiveness are strengthened by diverse perspectives, equal access to professional opportunities and a working environment based exclusively on merit, competence and mutual respect.

The objective of this Plan is to establish the principles, organisational measures and monitoring mechanisms necessary to ensure that employment practices, career development and working conditions are free from discrimination based on gender or any other personal characteristic.

The Plan has been developed in accordance with the principles promoted by the European Union under Horizon Europe and reflects internationally recognised best practices for equality, diversity and inclusion within research and innovation organisations.

1.2 Scope

This Plan applies to all activities performed by ON-AIR, including:

- recruitment and selection;
- employment conditions;
- remuneration principles;
- career development;
- access to training;
- project assignments;
- leadership opportunities;
- work-life balance initiatives;
- prevention of discrimination and harassment;
- relationships with customers, suppliers, subcontractors and project partners whenever applicable.

The principles contained in this Plan apply equally to permanent employees, temporary personnel, consultants, interns, collaborators and any individual working on behalf of ON-AIR.

1.3 Guiding Principles

The implementation of this Gender Equality Plan is based on the following principles:

- equal opportunities for all individuals;
- recruitment and career progression based exclusively on competence, qualifications and performance;
- zero tolerance towards discrimination, harassment or inappropriate behaviour;
- respect for diversity as a source of innovation and organisational value;
- transparency of organisational processes;
- continuous improvement through periodic monitoring and measurable objectives.

1.4 Alignment with European Policies

This Gender Equality Plan supports the principles established by the European Commission for research and innovation programmes, including Horizon Europe, and contributes to the creation of an inclusive working environment capable of attracting, developing and retaining highly qualified professionals regardless of gender.

The Plan also reflects the company's commitment to sustainable organisational development, ethical business conduct and responsible corporate governance.

2. Company Commitment

2.1 Management Commitment

ON-AIR Consulting & Solutions S.r.l. is committed to maintaining a professional working environment in which every individual is treated with dignity, fairness and respect.

The Company's management recognises that equal opportunities contribute to technical excellence, innovation, employee satisfaction and long-term business sustainability. Consequently, employment-related decisions shall be based exclusively on professional competence, qualifications, experience, performance and the requirements of the organisation.

Gender, age, nationality, ethnicity, disability, religion, sexual orientation or any other personal characteristic shall not influence recruitment, remuneration, professional development, project assignment or career progression.

2.2 Commitment to Equal Opportunities

ON-AIR is committed to ensuring that all personnel have equal access to:

- recruitment opportunities;
- professional training;
- technical and managerial responsibilities;
- career development;
- leadership opportunities;
- participation in national and international projects.

The Company shall actively promote objective and transparent evaluation processes designed to ensure that appointments and promotions are based on merit and professional capability.

2.3 Inclusive Working Environment

ON-AIR is committed to providing a working environment that values collaboration, mutual respect and diversity of perspectives.

All employees and collaborators are expected to contribute to a workplace in which professional opinions are evaluated according to their technical merit and where inappropriate behaviour, discrimination or harassment are not tolerated.

Every member of the organisation shares responsibility for maintaining a respectful and inclusive working environment.

2.4 Work-Life Balance

Recognising that organisational flexibility contributes to employee wellbeing and productivity, ON-AIR promotes working practices that facilitate an appropriate balance between professional and personal responsibilities whenever compatible with project, customer and operational requirements.

Where feasible, the Company supports flexible organisational arrangements that enable employees to reconcile work commitments with family and personal responsibilities without compromising professional development.

2.5 Continuous Improvement

Gender equality is considered an integral component of ON-AIR's organisational development.

The Company therefore commits to:

- periodically reviewing its employment practices;
- monitoring measurable indicators related to gender equality;
- identifying opportunities for improvement;
- implementing corrective actions whenever necessary;
- reviewing this Gender Equality Plan on a regular basis.

Management shall ensure that appropriate resources are made available for the implementation and periodic review of this Plan.

2.6 Communication

This Gender Equality Plan shall be made available to all personnel and, where appropriate, to customers, partners and other stakeholders.

The principles contained in this document shall be considered during the definition of company policies and organisational practices and shall be reviewed periodically to ensure their continued effectiveness and alignment with applicable European and national frameworks.

3. Current Situation

3.1 Company Profile

ON-AIR Consulting & Solutions S.r.l. is an Italian high-technology engineering company operating primarily in the aerospace, space, defence and advanced digital systems sectors.

The Company develops engineering solutions, system studies, software, mission analysis and system integration activities for institutional and commercial customers, participating in both national and European collaborative programmes.

As a knowledge-intensive SME, the Company's principal asset is its highly qualified workforce, composed of engineers, scientists, software developers and technical specialists.

3.2 Workforce Overview

At the date of issue of this Plan, the composition of the workforce is periodically monitored through internal Human Resources records.

The Company maintains information regarding:

- total number of employees;
- distribution by gender;
- employment category;
- technical and managerial positions;
- recruitment statistics;
- promotions;
- participation in training activities.

The information is collected exclusively for organisational and statistical purposes and is processed in accordance with applicable data protection legislation.

The current workforce profile is summarised in Table 1.

Table 1 – Workforce Overview

Indicator	Value
Total employees	10
Female employees	6
Male employees	4
Technical staff	9
Administrative staff	0
Managers	1
Average age	44 years

3.3 Current Assessment

ON-AIR operates in engineering disciplines where, both nationally and internationally, female participation remains lower than in many other professional sectors.

The Company acknowledges this structural characteristic of the labour market while remaining fully committed to ensuring that recruitment, career progression and professional development are based exclusively on competence, qualifications and merit.

The Company does not establish recruitment quotas. Instead, it seeks to guarantee that every recruitment and promotion process provides equal opportunities to all suitably qualified candidates.

3.4 Existing Practices

ON-AIR does not pursue numerical gender targets or recruitment quotas. The Company is committed to ensuring equal opportunities by selecting, developing and promoting individuals exclusively on the basis of competence, professional qualifications, experience and performance.

Several organisational practices already contribute to equal opportunities within the Company, including:

- merit-based recruitment and selection;
- objective evaluation of technical competence;
- equal access to training opportunities;
- collaborative multidisciplinary project teams;
- flexible organisational arrangements whenever operationally feasible;
- direct communication between personnel and management.

These practices constitute the foundation upon which the present Gender Equality Plan is built.

3.5 Areas for Improvement

Although no significant organisational issues have been identified, ON-AIR recognises that continuous improvement represents an essential component of effective corporate governance.

The Company therefore intends to strengthen its organisational practices in the following areas:

- systematic monitoring of gender-related indicators;
- increased awareness of equality and inclusion principles;
- formalisation of internal procedures where appropriate;
- periodic review of recruitment and career development processes;
- regular assessment of the effectiveness of this Gender Equality Plan.

Progress against these objectives will be reviewed annually by Company Management.

4. Governance

4.1 Governance Principles

The implementation of this Gender Equality Plan is integrated within the Company's overall governance framework.

Responsibility for promoting equal opportunities is shared throughout the organisation, while overall accountability for the implementation, effectiveness and periodic review of this Plan remains with Company Management.

The governance model has been designed to be proportionate to the size and organisational structure of ON-AIR while ensuring effective oversight and continuous improvement.

4.2 Responsibilities

The Chief Executive Officer has overall responsibility for:

- approving the Gender Equality Plan;
- ensuring adequate organisational support for its implementation;
- promoting a working environment based on equal opportunities and mutual respect;
- reviewing the effectiveness of the Plan on a periodic basis.

Managers and Project Managers are responsible for:

- applying the principles contained in this Plan within their respective activities;
- ensuring that project assignments and professional evaluations are based on objective technical and organisational criteria;
- contributing to an inclusive and respectful working environment;

- reporting any significant issues requiring management attention.

Each employee and collaborator is expected to:

- respect the principles established by this Plan;
- contribute positively to an inclusive workplace;
- avoid behaviours that could constitute discrimination, harassment or intimidation;
- cooperate in maintaining a professional working environment based on mutual respect.

4.3 Decision-Making Processes

Employment-related decisions, including recruitment, project assignments, career development and remuneration, shall be based on objective and documented criteria whenever applicable.

The Company seeks to ensure that decision-making processes are:

- transparent;
- merit-based;
- consistent;
- free from unlawful discrimination.

Where appropriate, significant employment decisions may be reviewed by Company Management to ensure consistency with the principles established in this Plan.

4.4 Reporting and Confidentiality

Personnel who believe they have experienced or witnessed discrimination, harassment or behaviour inconsistent with this Plan are encouraged to report their concerns through the appropriate management channels.

Reports shall be handled:

- confidentially;
- impartially;
- without retaliation against the reporting individual acting in good faith.

The Company is committed to assessing reported situations objectively and to adopting appropriate corrective measures whenever necessary.

4.5 Monitoring

Implementation of this Plan shall be reviewed periodically by Company Management.

The review shall consider:

- workforce composition;
- recruitment activities;
- promotions;
- participation in training;
- any reported equality-related issues;
- progress against the objectives defined in this Plan.

Where appropriate, improvement actions shall be identified and incorporated into subsequent revisions of the Plan.

4.6 Review of the Gender Equality Plan

This Gender Equality Plan shall normally be reviewed every three years or earlier if significant organisational, legal or operational changes occur.

The review process shall verify:

- continued alignment with applicable European and national frameworks;
- effectiveness of implemented measures;
- achievement of planned objectives;
- opportunities for further organisational improvement.

Updated versions of the Plan shall be approved by the Chief Executive Officer and communicated to Company personnel.

5. Recruitment and Career Development

5.1 Objectives

ON-AIR is committed to attracting, recruiting, developing and retaining highly qualified professionals through transparent and merit-based processes.

The Company aims to ensure that all candidates and employees are provided with equal opportunities throughout their professional careers, from recruitment to career progression, irrespective of gender or other personal characteristics.

5.2 Recruitment Principles

Recruitment activities shall be conducted according to the following principles:

- equal access to employment opportunities;
- objective evaluation of professional qualifications and competencies;
- transparent selection procedures;
- non-discriminatory job descriptions and vacancy announcements;

- equal treatment of all candidates throughout the recruitment process.

Selection decisions shall be based exclusively on qualifications, professional experience, technical competence, motivation and the requirements of the specific position.

5.3 Selection Process

Recruitment processes shall normally include an assessment of:

- educational background;
- relevant professional experience;
- technical competencies;
- problem-solving capability;
- communication and teamwork skills;
- suitability for the specific role.

Interview questions and evaluation criteria shall relate exclusively to the professional requirements of the position.

Personal circumstances unrelated to professional performance shall not influence recruitment decisions.

5.4 Career Development

ON-AIR promotes professional growth by providing employees with opportunities to develop their technical, managerial and interpersonal competencies.

Career progression shall be based on factors including:

- demonstrated competence;
- quality of work;
- professional responsibility;
- initiative;
- project performance;
- commitment to continuous improvement.

Equal access to career development opportunities shall be ensured for all employees.

5.5 Access to Training

The Company recognises continuous learning as an essential element of professional development.

Employees shall have equal opportunities to participate in:

- technical training;

- management training;
- project management courses;
- conferences and workshops;
- professional certification programmes;
- internal knowledge-sharing activities.

Participation in training activities shall be determined primarily by organisational needs, individual development plans and project requirements.

5.6 Leadership Opportunities

ON-AIR encourages qualified personnel to assume increasing technical and managerial responsibilities during their careers.

Appointments to positions such as Project Manager, Technical Manager, System Engineer, Team Leader or Department Coordinator shall be based on demonstrated competence, leadership capability and organisational requirements.

The Company is committed to ensuring that all employees have equal opportunity to compete for leadership positions.

5.7 Fair Evaluation

Employee performance evaluations, where applicable, shall be conducted using objective criteria related to professional performance and contribution to Company objectives.

Performance assessments shall seek to recognise individual achievements, identify development opportunities and support continuous professional growth.

The evaluation process shall be applied consistently and without discrimination.

5.8 Continuous Improvement

The effectiveness of recruitment and career development practices shall be periodically reviewed using appropriate organisational indicators.

Where improvement opportunities are identified, Company Management shall evaluate and implement appropriate corrective measures to further strengthen transparency, fairness and equal opportunity throughout the employee lifecycle.

6. Equal Pay and Career Progression

6.1 Objectives

ON-AIR is committed to ensuring that remuneration and career progression are determined according to objective professional criteria, applied consistently and fairly across the organisation.

The Company recognises that transparent employment practices contribute to employee motivation, organisational trust and long-term business sustainability.

6.2 Equal Pay Principles

Employees performing comparable work under comparable responsibilities shall receive remuneration determined by objective factors including:

- professional qualifications;
- relevant experience;
- level of responsibility;
- technical competence;
- individual performance;
- market conditions;
- contractual framework.

Gender or any other personal characteristic shall not influence salary determination, salary reviews or employment benefits.

6.3 Salary Review

Salary adjustments shall normally consider one or more of the following factors:

- increased professional responsibilities;
- demonstrated technical excellence;
- sustained high performance;
- acquisition of new competencies;
- successful completion of strategic projects;
- organisational needs.

The Company seeks to ensure that salary review processes remain transparent, consistent and merit-based.

6.4 Career Progression

Professional growth within ON-AIR is based on competence, commitment and demonstrated capability.

Career progression may include:

- increased technical responsibilities;
- coordination of engineering activities;
- project management roles;
- system engineering responsibilities;
- organisational management positions.

Advancement opportunities are open to all employees meeting the professional requirements of the position.

6.5 Recognition of Professional Merit

ON-AIR considers professional merit to be the primary criterion for recognising individual contributions.

The Company values:

- technical expertise;
- innovation;
- quality of engineering work;
- teamwork;
- leadership capability;
- customer orientation;
- commitment to continuous improvement.

Recognition mechanisms shall be applied fairly and consistently throughout the organisation.

6.6 Monitoring

The Company shall periodically review remuneration and career progression practices in order to identify any unintended disparities that cannot be justified by objective professional factors.

Where significant differences are identified, Company Management shall assess their causes and, where appropriate, define corrective actions consistent with the principles of this Plan.

6.7 Transparency

Employees shall have access to information regarding the general principles governing remuneration, career development and professional evaluation.

While individual salary information remains confidential, the criteria used for employment decisions shall be communicated clearly and applied consistently throughout the organisation.

7. Work-Life Balance

7.1 Objectives

ON-AIR recognises that an appropriate balance between professional responsibilities and personal life contributes to employee wellbeing, motivation and long-term organisational effectiveness.

The Company is committed to promoting working practices that support employees in balancing their professional, family and personal responsibilities while ensuring the successful execution of customer projects and business activities.

7.2 General Principles

Work-life balance initiatives shall be implemented in a manner consistent with:

- operational requirements;
- customer commitments;
- project schedules;
- applicable labour legislation;
- individual circumstances whenever reasonably practicable.

The Company recognises that flexibility benefits both employees and the organisation by supporting productivity, engagement and retention of highly qualified personnel.

7.3 Flexible Working Arrangements

Where compatible with business and project requirements, ON-AIR may support organisational flexibility through measures such as:

- flexible working hours;
- hybrid or remote working arrangements;
- flexible scheduling of working activities;
- temporary adaptations to individual working arrangements when justified by personal or family circumstances.

Such arrangements shall be evaluated on a case-by-case basis, taking into account operational needs and fairness towards all personnel.

7.4 Parenthood and Family Responsibilities

ON-AIR fully supports the rights of employees relating to maternity, paternity, parental leave and other family-related entitlements established by applicable legislation.

The Company is committed to ensuring that employees making legitimate use of such rights are not disadvantaged with regard to:

- career opportunities;
- professional development;
- participation in projects;
- access to training;
- performance evaluation.

Following periods of authorised leave, reasonable efforts shall be made to facilitate the employee's effective reintegration into the workplace.

7.5 Health and Wellbeing

The Company promotes a healthy and respectful working environment by encouraging:

- constructive collaboration;
- effective communication;
- reasonable workload planning;
- respect for individual wellbeing;
- attention to occupational health and safety.

Management seeks to identify organisational practices that contribute to employee wellbeing while maintaining the high standards of professionalism expected by customers and partners.

7.6 Emergency Situations

Where exceptional personal or family circumstances arise, ON-AIR shall endeavour, whenever operationally feasible, to identify temporary organisational solutions that enable employees to address such situations without unnecessary disruption to their professional responsibilities.

7.7 Continuous Improvement

The effectiveness of work-life balance measures shall be periodically reviewed through dialogue between employees and management.

Feedback received from personnel may be considered when defining future organisational improvements consistent with the Company's operational requirements and strategic objectives.

8. Prevention of Harassment and Discrimination

8.1 Objectives

ON-AIR is committed to maintaining a professional working environment characterised by mutual respect, dignity and equal treatment for all personnel.

The Company does not tolerate unlawful discrimination, harassment, bullying, intimidation or any other behaviour that may compromise an individual's dignity, professional integrity or ability to work effectively.

This commitment applies to all professional interactions within the Company and, where applicable, during activities involving customers, suppliers, subcontractors and project partners.

8.2 Principles

All personnel are expected to contribute to a workplace where:

- every individual is treated with courtesy and respect;
- professional opinions are evaluated on their technical and organisational merit;
- diversity of experience and perspective is recognised as a source of innovation;
- interpersonal relationships are conducted in a professional manner.

Behaviour that creates an intimidating, hostile, offensive or degrading working environment is inconsistent with the principles of this Plan.

8.3 Non-Discrimination

Employment-related decisions shall not be influenced by gender or by any other personal characteristic unrelated to professional competence or job performance.

This principle applies throughout the employee lifecycle, including:

- recruitment;
- assignment of responsibilities;
- access to training;
- career development;
- remuneration;
- performance evaluation;
- termination of employment.

8.4 Reporting Concerns

Employees and collaborators who believe they have experienced or witnessed conduct inconsistent with this Plan are encouraged to raise their concerns through the appropriate management channels.

Reports may relate to:

- discrimination;
- harassment;
- bullying;
- intimidation;
- retaliation;
- any other behaviour inconsistent with the Company's ethical principles.

The Company encourages concerns to be raised promptly in order to facilitate an effective and objective assessment.

8.5 Assessment of Reports

All reports shall be handled with:

- confidentiality;
- impartiality;
- respect for the rights of all parties involved;
- appropriate protection of personal data.

Each case shall be assessed objectively, taking into account the available evidence and the circumstances of the specific situation.

The Company shall avoid both unjustified accusations and the dismissal of legitimate concerns, ensuring that every matter is examined fairly and proportionately.

8.6 Protection Against Retaliation

Individuals who report concerns in good faith shall not be subjected to retaliation or adverse treatment as a consequence of making such reports.

Equally, individuals who are the subject of a report shall be treated fairly throughout any assessment process, respecting the principles of confidentiality, impartiality and due process.

8.7 Corrective Measures

Where a breach of this Plan or of applicable legislation is confirmed, ON-AIR shall adopt appropriate corrective measures proportionate to the nature and seriousness of the situation.

Such measures may include organisational actions, additional training, disciplinary measures or other actions considered appropriate under applicable legislation and Company procedures.

8.8 Awareness

The Company promotes awareness of respectful workplace behaviour through communication, management commitment and periodic training activities.

All personnel share responsibility for maintaining a professional environment in which collaboration, respect and equal opportunity remain fundamental organisational values.

9. Training and Awareness

9.1 Objectives

ON-AIR recognises that an inclusive and respectful working environment is supported not only by organisational policies but also by awareness, professional behaviour and effective communication.

The objective of training and awareness activities is to ensure that all personnel understand the principles contained in this Gender Equality Plan and their individual responsibilities in contributing to a fair, respectful and inclusive workplace.

9.2 General Principles

Training activities shall promote:

- equal opportunity principles;
- mutual respect;
- professional ethics;
- appropriate workplace behaviour;
- awareness of discrimination and harassment prevention;
- effective communication and collaboration.

The Company seeks to integrate these principles into its organisational culture and everyday professional activities.

9.3 Induction of New Personnel

New employees and collaborators shall be informed of the Company's commitment to equal opportunities and the principles established in this Gender Equality Plan as part of their onboarding process.

Where appropriate, new personnel shall receive information regarding:

- the Company's organisational values;
- expected standards of professional conduct;
- reporting channels for concerns;
- individual responsibilities under this Plan.

9.4 Periodic Awareness Activities

ON-AIR shall periodically promote awareness initiatives appropriate to the size and structure of the organisation.

Such initiatives may include:

- internal presentations;
- management communications;
- distribution of guidance material;
- discussions during staff meetings;
- short training sessions on workplace behaviour and equal opportunity principles.

The Company favours practical and proportionate initiatives that support continuous improvement without creating unnecessary administrative burden.

9.5 Management Responsibilities

Managers and Project Managers are expected to promote the principles of this Plan through their daily leadership activities.

Management should:

- encourage respectful professional interactions;
- support transparent decision-making;
- address inappropriate behaviour promptly and fairly;
- foster collaboration within multidisciplinary teams.

Leadership behaviour represents an essential element in maintaining an organisational culture consistent with the objectives of this Plan.

9.6 Continuous Learning

ON-AIR encourages continuous professional development not only in technical disciplines but also in organisational and interpersonal competencies.

The Company recognises that effective teamwork, communication and mutual respect are essential factors contributing to innovation, engineering quality and successful project execution.

9.7 Review of Training Activities

The effectiveness of awareness and training initiatives shall be reviewed periodically as part of the overall monitoring of this Gender Equality Plan.

Feedback from employees may be considered when defining future awareness activities and organisational improvements.

10. Monitoring, Implementation and Review

10.1 Objectives

The implementation of this Gender Equality Plan shall be monitored regularly to ensure that its objectives remain effective, proportionate and aligned with the Company's organisational development.

Monitoring activities are intended to support continuous improvement rather than to establish numerical targets or quotas.

10.2 Monitoring Indicators

ON-AIR shall periodically review a number of organisational indicators, including where applicable:

- workforce composition;
- recruitment activities;
- promotions and career progression;
- participation in training activities;
- access to leadership opportunities;
- work-life balance initiatives;
- reported discrimination or harassment concerns;
- implementation status of the actions defined in this Plan.

The Company may introduce additional indicators as organisational needs evolve.

10.3 Key Performance Indicators (KPIs)

The following indicators provide a practical framework for monitoring the implementation of this Plan.

KPI	Target
Gender Equality Plan reviewed according to schedule	100%

KPI	Target
Recruitment processes applying merit-based selection principles	100%
New personnel informed of the Gender Equality Plan	100%
Employees with access to professional training	100%
Periodic awareness activities completed	At least one per year
Confirmed discrimination or harassment cases left unresolved	0
Review of organisational indicators completed	Annually

These indicators are intended to support continuous organisational improvement and may be revised as the Company develops.

10.4 Implementation Responsibilities

Overall responsibility for implementation of this Plan rests with the Chief Executive Officer.

Managers are responsible for applying its principles within their respective activities and for supporting continuous improvement through their daily management practices.

All employees contribute to the successful implementation of the Plan by acting in accordance with the principles of professionalism, respect and equal opportunity.

10.5 Periodic Review

This Gender Equality Plan shall normally be reviewed annually to assess:

- implementation progress;
- effectiveness of organisational measures;
- achievement of planned objectives;
- opportunities for improvement;
- changes in applicable legislation or European guidance.

A comprehensive revision of the document shall normally be performed every three years, or earlier if significant organisational changes occur.

10.6 Continuous Improvement

ON-AIR considers continuous improvement to be a fundamental element of good corporate governance.

Experience gained during implementation of this Plan shall be used to strengthen organisational practices, improve employee wellbeing and reinforce the Company's commitment to equal opportunities, merit-based professional development and responsible business management.

10.7 Approval and Validity

This Gender Equality Plan becomes effective upon approval by the Chief Executive Officer.

The Plan shall remain in force until superseded by a revised version and shall be made available to Company personnel and, where appropriate, to customers, partners and other stakeholders.

CEO Approval

Marco Airaghi