



KIILTO – GENDER EQUALITY PLAN (GEP)

Version: 1.0

Validity period: 2026–2028 (reviewed annually)

Public document: Published on Kiilto's website

Document owner: HR Specialist Ella Miettinen

Approval and signature

This GEP is approved and signed by Kiilto Group Oy's top management. It applies and is communicated actively to the Kiilto Group subgroup organization (hereinafter "Kiilto"). The signed version is published on the organisation's website. The public website version shall remain available throughout the validity period of this plan. Internal communication shall be documented through the relevant internal communication channels, and the document owner shall retain evidence of publication and communication for audit purposes.

Role and Name	Signature
CEO Anssi Asikainen	[Electronically signed]
CPCC Kati Korolainen-Kujala	[Electronically signed]



1. Commitment

Kiilto is committed to gender equality as part of a fair, inclusive and safe working environment.

2. Scope and applicability

This GEP applies to Kiilto operations and employees within the scope of Kiilto's employment practices. The plan complements Kiilto's existing equality and non-discrimination planning and related internal guidance. The minimum mandatory process-related requirements of this GEP apply at group level where relevant and are implemented in a manner consistent with applicable local legislation. If any local legal requirements are stricter than this plan, the stricter local requirements shall prevail.

3. Governance, responsibilities and dedicated resources

Kiilto ensures sufficient resources and expertise for implementation of gender equality through defined governance and role ownership. Implementation capability is reviewed on need basis. Key roles include: Overall accountability for the existence, annual review and organisational communication of this GEP rests with top management. Operational ownership of implementation, monitoring and annual reporting rests with HR. Support functions and managers contribute based on their position and responsibilities.

The following parties allocate designated working time for GEP implementation:

- HR / People & Culture: overall coordination, monitoring, reporting, and integration into HR processes. HR acts as the document owner and maintains the current approved version, the review log, and the audit evidence register referred to in Appendix B.
- DEI working group: supports development of initiatives, training and communications; promotes inclusive practices. The DEI working group has an advisory and support role.
- Managers and decision-makers: implement actions in daily work, recruitment, development and workplace conduct. Managers are expected to complete relevant training and apply the principles of this plan in people-related decisions.
- Employee representatives / cooperation bodies: participate in planning, feedback and review as applicable. Consultation and dialogue are documented where applicable under local requirements or established practices.



4. Data collection, monitoring and annual reporting

Kiilto collects and analyses sex-disaggregated personnel data to understand the current state and to monitor progress. Kiilto reports progress annually using defined indicators. Data sources may include HR systems, recruitment data, pay surveys, and employee surveys.

Indicators:

Indicator	Definition	Owner	Reporting frequency	Minimum evidence retained
Workforce gender distribution	Share of women/men by job family and level (incl. leadership)	HR	Annual	Extract/report showing source data and calculation logic
Pay equality review	Summary of pay survey / pay equality review and actions where applicable under local legislation, company-size thresholds and local reporting cycles	HR	Annual or per applicable local statutory cycle	Survey/review summary and documented action follow-up; if not legally applicable in a country/entity, documented applicability rationale is retained
Training coverage	Participation in equality/DEI and bias training by target group	HR / DEI	Annual	Training completion report or attendance record
Harassment cases and handling	Number of reported cases and status (aggregated)	HR / HSE / Compliance / Whistleblowing	Annual	Aggregated case summary and follow-up status

5. Training and awareness

Kiilto provides awareness-raising and training on gender equality for the organization and training on unconscious gender bias for managers and decision-makers. Training is delivered through a mix of e-learning and targeted sessions. Training completion and coverage can be monitored as part of the indicator set. Training planning, assignment and completion evidence shall be retained in a manner that allows Kiilto to demonstrate implementation on request. Where completion is not yet full, the annual sustainability report shall describe the current coverage and the planned follow-up measures.



- All employees: equality, respectful and inclusive behaviour. Awareness-raising is communicated to the whole organisation.
- Managers/decision-makers: unconscious bias, inclusive recruitment, and fair performance & development practices.
- Specialist roles (e.g., HR, recruiters): training on inclusive processes and data-informed actions. Specialist training may be expanded according to business need.

6. Work–life balance and organisational culture

Kiilto promotes work–life balance through fair practices, supportive leadership and, where applicable, flexible working arrangements. We promote a diverse, equal and inclusive work environment, where people feel valued. Follow-up may use available people data, survey insights and other appropriate feedback channels in aggregated form.

7. Gender balance in leadership and decision-making

Kiilto tracks data on gender balance in leadership roles and promotes transparent, competence-based selection and development practices. Gender-balances are reported in the annual sustainability report. Where relevant, annual review may also consider succession, talent development and access to development opportunities in aggregated form.

8. Gender equality in recruitment and career progression

Kiilto promotes gender-neutral recruitment and equal career opportunities. We apply DEI-principles in recruitment process. Hiring and development decisions are based on consistent criteria. Measures include inclusive job advertising and selection approaches. Where feasible, recruitment and progression practices are periodically reviewed to identify potential bias risks and improvement actions.

9. Measures against gender-based violence, including sexual harassment

Kiilto has zero tolerance for harassment and inappropriate treatment. Clear reporting channels (e.g. Whistleblowing) and handling procedures are in place, including confidential reporting options. Reported issues are handled in the dedicated whistleblowing team and with relevant parties. Annual follow-up may include aggregated reporting on case volumes, status and identified preventive actions where legally and operationally appropriate.

10. Communication and review cycle

The GEP is communicated to all employees and relevant stakeholders. The public version is available on Kiilto's website. The plan is reviewed annually by the document owner.



Appendix A – Compliance checklist (Horizon Europe minimum requirements)

Requirement	Where addressed in this document	Evidence / notes
Public document (signed, published, communicated)	Cover + Approval and signature + Section 10	Publish signed PDF/HTML on website; communicate internally; retain evidence of publication and communication.
Dedicated resources	Section 3	Named roles and annual resourcing / responsibility review.
Data collection & monitoring (sex-disaggregated; annual reporting)	Section 4 + indicator table	Annual report prepared; indicators defined; evidence retained in controlled location.
Training (awareness + bias training for decision-makers)	Section 5	Training plan and annual coverage monitoring; completion evidence retained.

SIGNATURES

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