BELOW280 LIMITED

Gender Equality Plan

2026–2028

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Approved by: Tom Bradley, Executive Director

below280.com

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1. Our Commitment to Gender Equality

Below280 Limited is committed to fostering gender equality across all aspects of its operations. This Gender Equality Plan sets out our goals, actions, and the resources we will dedicate to achieving meaningful and sustainable progress.

This plan has been approved by the Executive Director and is published on our company website, where it is accessible to research project partners and the public. It will be actively communicated to all staff. We will report annually on our progress and review the plan comprehensively at least every two years.

1.1 About Below280

Below280 is a UK-based Life Cycle Assessment (LCA) consultancy headquartered in Cramlington, Northumberland. We provide expert consultancy, scientific research, and education in LCA, Environmental Product Declarations (EPDs), Carbon Border Adjustment Mechanism (CBAM), carbon capture due diligence, Whole Life Carbon Assessments (WLCA), EU Battery Regulation carbon footprint declarations, and related environmental impact services.

Our origins trace back to LCA work developed within the National Renewable Energy Centre (Narec). That department spun out as a separate organisation eventually known as Decerna. In 2026, the LCA services were established as Below280, a dedicated sustainability consultancy helping manufacturers understand, measure, and communicate the environmental impact of their products.

Our team comprises scientists and engineers delivering in-depth scientific LCA studies. We work with clients ranging from start-up SMEs to multinationals, and are actively involved in multi-year Horizon Europe research projects. We are the UK partner for GreenDelta, developers of the open-source software openLCA. In-person training and consultancy is delivered from Decerna House and at client premises and venues across the UK and internationally.

1.2 Scope

This plan applies to all staff, whether permanent, temporary, part-time, or on fixed-term contracts, as well as to contractors, consultants, interns, and volunteers working at or on behalf of Below280. It covers all of our activities: consultancy, research, education, training, and corporate operations.

1.3 Existing Policy Foundations

Below280 has an established policy framework that supports equality and fair treatment, including an Equality and Diversity Policy, a merit-based Recruitment Policy, an Anti-Bullying and Harassment Policy (which classifies sexual harassment as gross misconduct), a Whistleblowing Policy providing protected reporting channels, Anti-Slavery and Anti-Corruption Policies, and a comprehensive Health and Safety Policy. In addition, the Company operates a Staff Handbook that sets out detailed employment provisions including enhanced maternity, paternity, shared parental, and adoption leave, hybrid and flexible working arrangements, core hours, private healthcare, six-monthly appraisals, and staff training and development. This GEP builds upon these foundations, addressing specific gaps and introducing targeted gender equality measures.

2. Current Situation Assessment

Before setting objectives, we have assessed our current position regarding gender equality. This assessment identifies both the strengths in our existing approach and the areas where targeted action is needed.

2.1 Strengths

- Our Equality and Diversity Policy explicitly prohibits discrimination on the basis of sex, gender reassignment, and all other protected characteristics under the Equality Act 2010.
- Recruitment is grounded in merit-based selection, with clear provisions addressing all forms of discrimination.
- Sexual harassment is classified as gross misconduct, with clear reporting and investigation procedures in place.
- A whistleblowing framework provides a protected channel for reporting concerns without fear of retaliation.
- The Company already offers enhanced parental leave beyond statutory requirements: maternity pay at 100% for 12 weeks then £200/week for a further 27 weeks; paternity pay at 100% for 2 weeks; and equivalent enhanced provisions for shared parental leave and adoption leave.
- Hybrid working is established (3 days office, 2 days working from home), with adjustable core hours (10am–3:30pm Monday to Thursday, 10am–3pm Friday) and a formal flexible working request process.
- Private healthcare is offered to all employees.
- Staff appraisals are conducted every six months, with training and professional development funded by the Company, including support for significant qualifications (postgraduate certificates, MSc programmes).
- The Company operates a Climate Perks scheme, offering paid journey days for employees who choose flight-free travel.
- A comprehensive Health and Safety Policy is in place, recently updated to reflect the Below280 identity.

2.2 Areas for Improvement

- No formal gender-disaggregated data collection or diversity monitoring is currently conducted.
- No specific gender equality training or unconscious bias training programme is in place; training needs are identified through general appraisals.
- No gender equality targets or key performance indicators have been set.
- No gender pay gap analysis or equal pay review has been carried out.
- While comprehensive parental leave and flexible working provisions exist, uptake is not monitored by gender, and these benefits are not actively promoted as part of a gender equality strategy.
- As an LCA consultancy operating in science and engineering, sectors with well-documented gender imbalances, proactive measures to attract and retain diverse talent are needed.
- The gender dimension is not yet systematically integrated into our research methodology or LCA project design.

3. Strategic Objectives and Planned Actions

Our GEP is structured around the five thematic areas recommended by the European Commission. For each area, we identify the key issues, set goals, and define specific actions with responsibilities, timelines, targets, indicators, and resources.

3.1 Work-Life Balance and Organisational Culture

Thematic Area 1: Work-Life Balance and Organisational Culture					
Main Issue(s)	Below280 already has strong work-life balance provisions, including hybrid working (3 days office / 2 WFH), adjustable core hours, a formal flexible working request process, enhanced parental leave (maternity, paternity, shared parental, and adoption), private healthcare, and a Climate Perks scheme. However, uptake of these provisions is not monitored by gender, and they are not actively promoted as part of a gender equality strategy.				
Goals / Priorities	Ensure that existing work-life balance provisions are promoted equitably, that uptake is monitored by gender, and that organisational culture supports gender-equal participation.				
Planned Actions	**Responsible**	**Timeline**	**Targets**	**Indicators**	**Resources**
Monitor and report on uptake of hybrid working, flexible working requests, and parental leave by gender on an annual basis	GE Working Group / HR	Annually from Q4 2026	Gender-disaggregated uptake data published annually	Annual report with uptake figures by gender	HR time; Calamari data
Actively promote existing enhanced parental leave provisions to all staff, ensuring that paternity, shared parental, and adoption leave are visible and encouraged equally	Executive Director / HR	Q3 2026	Information pack distributed to all staff; provisions highlighted in onboarding	Distribution records; onboarding checklist update	Staff time
Conduct annual staff survey on work-life balance and organisational culture with gender-disaggregated analysis	GE Working Group	Annually from Q2 2027	Min. 70% response rate; year-on-year improvement	Survey results disaggregated by gender	Survey tool; staff time
Review whether current core hours, hybrid working arrangements, and meeting schedules support equal participation regardless of gender	Executive Director / HR	Q1 2027	Review completed; any adjustments implemented	Review report; updated guidance if needed	Staff time

and caring responsibilities					

3.2 Gender Balance in Leadership and Decision-Making

Thematic Area 2: Gender Balance in Leadership and Decision-Making					
Main Issue(s)	As a specialist consultancy in science and engineering, sectors with well-documented gender imbalances, there is a risk that leadership and senior technical roles may not reflect gender balance. No formal monitoring of gender composition exists.				
Goals / Priorities	Achieve and maintain balanced gender representation in leadership, project leadership, and decision-making roles.				
Planned Actions	**Responsible**	**Timeline**	**Targets**	**Indicators**	**Resources**
Conduct baseline audit of gender composition across all levels (directors, senior consultants, project leads, all staff)	GE Working Group	Q3 2026	Gender composition report completed	Published report with disaggregated figures	Staff time; HR data
Set aspirational targets for gender balance in leadership and project lead roles	Executive Director	Q4 2026	Targets communicated (e.g., min. 40% of either gender)	Published targets; annual tracking	Staff time
Ensure gender-balanced interview panels for all roles	Recruiting managers	Q1 2027	All panels include at least one member of each gender where possible	Panel composition records	Staff time
Include gender balance as a standing agenda item in annual management review	Executive Director	Annually from 2027	Reviewed at each annual meeting	Meeting minutes	Staff time

3.3 Gender Equality in Recruitment and Career Progression

Thematic Area 3: Gender Equality in Recruitment and Career Progression	
Main Issue(s)	Our recruitment policy is merit-based but lacks gender-specific actions: gender-neutral language checks, pay gap analysis, or targeted outreach to underrepresented genders in LCA, environmental science, and engineering. While six-monthly appraisals and Company-funded training and development are in place, promotion criteria are not published and progression data is not tracked by gender.

Goals / Priorities	Ensure gender-equitable recruitment and career progression. Proactively address the science and engineering sector's gender imbalance. Close any identified pay gap.				
Planned Actions	**Responsible**	**Timeline**	**Targets**	**Indicators**	**Resources**
Review all job descriptions and advertisements for gender-neutral language; use gender decoder tools	Recruiting managers	Q3 2026	100% of vacancies use gender-neutral language	Audit of postings; compliance rate	Staff time; optional external tool
Collect and analyse gender-disaggregated recruitment data (applications through to hires)	HR	Ongoing from Q3 2026	Data collected for every campaign	Quarterly report with gender breakdown	HR time; tracking system
Conduct a gender pay gap analysis	Executive Director / Finance	Q1 2027	Analysis completed and documented	Pay gap report; action plan if gap >5%	Payroll data; optional external auditor
Develop and publish transparent criteria for promotion and career progression	Executive Director	Q2 2027	Criteria document published	Promotion data disaggregated by gender	Staff time
Advertise roles through channels reaching underrepresented genders in STEM (e.g., WISE, STEM returner programmes)	Recruiting managers	Ongoing from Q3 2026	At least two diversity-focused channels per campaign	Channel records; diversity of applicant pool	Advertising budget

3.4 Integration of the Gender Dimension in Research and Innovation

Thematic Area 4: Integration of the Gender Dimension in Research and Innovation					
Main Issue(s)	Below280 undertakes scientific research and contributes to international research projects. The gender dimension is not yet systematically considered in research design, LCA methodology, or project proposals.				
Goals / Priorities	Integrate sex/gender analysis into our research and LCA work, ensuring our scientific outputs consider gender-differentiated impacts where relevant.				
Planned Actions	**Responsible**	**Timeline**	**Targets**	**Indicators**	**Resources**
Develop internal guidance for integrating the gender dimension into research	GE Working Group / Senior Consultants	Q4 2026	Guidance produced and disseminated	Guidance document; evidence of use in proposals	Staff time; external expertise if needed

proposals and LCA project scoping					
Include gender considerations in all new proposals, including Horizon Europe, and update LCA project scoping templates	Project Leads	Ongoing from Q1 2027	All new proposals include gender consideration	Proposal checklist; proportion of compliant projects	Staff time
Train research and consultancy staff on integrating the gender dimension in research and LCA	GE Working Group	Q2 2027	All research/consultancy staff trained	Training completion records	Training budget; external trainer
Incorporate the gender dimension into our education and training offerings (openLCA courses, LCA workshops) where appropriate	Training Lead	Q3 2027	Gender dimension referenced in course materials	Updated materials; participant feedback	Staff time

3.5 Measures Against Gender-Based Violence Including Sexual Harassment

Thematic Area 5: Measures Against Gender-Based Violence Including Sexual Harassment					
Main Issue(s)	Our Anti-Bullying and Harassment Policy classifies sexual harassment as gross misconduct with clear investigation procedures, and the Staff Handbook reinforces this through a formal disciplinary procedure (including gross misconduct provisions for harassing or bullying behaviour). However, there is no dedicated prevention training programme, and coverage should be extended explicitly to off-site contexts such as client visits and training venues.				
Goals / Priorities	Strengthen prevention of and response to gender-based violence and sexual harassment, including in off-site working contexts.				
Planned Actions	**Responsible**	**Timeline**	**Targets**	**Indicators**	**Resources**
Deliver mandatory sexual harassment awareness and prevention training for all staff	GE Working Group / External trainer	Q4 2026	100% of staff trained within first year	Training completion records	Training budget; external provider

Update the Anti-Bullying and Harassment Policy to explicitly address gender-based violence, bystander intervention, and off-site working contexts	Executive Director	Q3 2026	Updated policy published	Policy document; staff acknowledgment	Staff time; legal review
Establish a confidential reporting channel for sexual harassment, accessible to all staff including those at client premises	Executive Director	Q4 2026	Channel operational	Channel availability; reports received and resolved	Reporting platform; staff time
Conduct annual anonymised review of harassment complaints and publish summary	GE Working Group	Annually from Q1 2028	Annual review completed	Summary report	Staff time
Designate trained contact persons for gender-based violence support	Executive Director	Q2 2027	At least two trained contacts in place	Designations; training certificates	Training costs

4. Training and Awareness-Raising

Gender equality training is central to delivering this plan. Below280 already invests in staff development through six-monthly appraisals, Company-funded training, and support for professional qualifications. We will build on this by introducing a structured gender equality training programme engaging all staff and ensuring that decision-makers receive targeted support.

- Introductory gender equality awareness training for all staff (mandatory, within 6 months of GEP adoption).
- Unconscious bias training for all staff involved in recruitment and selection decisions.
- Specialist training on integrating the gender dimension in research and LCA for project leads and senior consultants.
- Sexual harassment prevention training for all staff, including guidance for off-site and client-facing work.
- Refresher training every two years.

Training will be delivered through a mix of internal sessions and external specialist providers, and training needs will continue to be identified through the existing six-monthly appraisal process. Completion will be tracked and reported as part of our annual monitoring.

5. Data Collection and Monitoring

Robust, gender-disaggregated data is essential for understanding our current position and measuring progress. We will collect and analyse data across the following areas, reporting annually:

- Workforce composition by gender at all levels (headcount, contract type, part-time/full-time).
- Recruitment pipeline data by gender (applications, shortlisted, interviewed, offered, hired).
- Pay and remuneration by gender, for annual pay gap analysis.
- Uptake of parental leave (maternity, paternity, shared parental, adoption) by gender.
- Uptake of hybrid working, flexible working requests, and adjustable hours by gender.
- Training and professional development participation by gender.
- Promotion and career progression by gender.
- Staff survey results on work-life balance and inclusion, disaggregated by gender.
- Harassment and complaint data (anonymised), analysed for gender patterns.
- Gender composition of research project teams and research outputs.

All data will be collected and processed in compliance with GDPR and the Company's existing data protection framework. Below280 already uses the Calamari HR system for absence and leave management, which will support gender-disaggregated reporting. Participation in voluntary diversity monitoring will be clearly communicated as optional and anonymous. The existing GDPR Employee Consent Form will be updated to cover gender equality data collection. An annual progress report will be published on our website and shared with research project partners.

6. Governance and Dedicated Resources

Effective implementation requires clear accountability and sufficient resources. Below280 commits the following governance structure and dedicated resources to this plan.

6.1 Governance

Role	Responsibilities
Executive Director (Gender Equality Champion)	Overall accountability; approves and signs the plan; ensures resources; reports to the Board
Gender Equality Working Group (min. 2 senior staff)	Coordinates actions; collects and analyses data; organises training; prepares annual progress reports; liaises with external gender experts
Senior Consultants / Project Leads	Implements actions in their areas; ensures gender-inclusive practices in research, recruitment, and client work
All Staff	Participates in training; supports an inclusive culture; reports concerns through established channels

6.2 Resources

- Staff time: Working Group members will dedicate a minimum of 2 hours per month to GEP activities.
- Financial resources: An annual budget of at least £2,000 will be allocated for training, external expertise, survey tools, and related activities.
- External expertise: Where internal capacity is insufficient, we will engage external gender equality consultants, trainers, or auditors.

6.3 Implementation Timeline

Period	Key Milestones
Q2–Q4 2026	GEP published on website; Working Group established; baseline gender audit; policy reviews and harmonisation; first training delivered; gender-neutral job description review
Q1–Q4 2027	First annual progress report; pay gap analysis; flexible working policy; all staff trained; gender dimension guidance for LCA and research; enhanced reporting channels; core hours policy
Q1–Q2 2028	Second annual progress report; refresher training; comprehensive GEP review and evaluation; harassment data review; preparation of GEP 2.0

7. Review and Sustainability

This plan is a living document. We are committed to continuous improvement and the long-term sustainability of gender equality within Below280.

- The GEP will be reviewed comprehensively at least every two years, with the next full review scheduled for Q1 2028.
- Where targets are not met, the Working Group will conduct a root cause analysis and propose corrective actions.
- Gender equality objectives will be integrated into our annual business planning.
- Lessons learned will inform future policy development and organisational practices.
- Legacy policy documents (including the Staff Handbook, GDPR Employee Consent Form, and Return to Work Review Form) will be updated to reflect Below280's current identity and to incorporate GEP-related enhancements.

8. Approval

This Gender Equality Plan has been approved by the Executive Director of Below280 Limited. It represents the Company's formal commitment to gender equality and will be published on our website and communicated to all staff.

Signed:	**Date:**
_____ **Tom Bradley** Executive Director Below280 Limited	_____06/05/2026_____

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