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Policy framework and action plan for a diverse and inclusive transition

FILMIN ELEVATE - Elevating EU VOD and
European content through innovative and
collaborative approaches

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Executive summary

The current policy framework and action plan for a diverse and inclusive transition is established to demonstrate COMUNIDAD FILMIN, S.L.'s commitment to equality through its policies, which are based on personnel development regardless of sex, gender (including gender identity or expression), sexual orientation, age, race, religion, national origin, disability, marital status, or any other characteristic protected by law.

This document should be understood as an effective instrument rather than a document produced merely out of legal obligation. The involvement of Management, the Monitoring Committee, and the workforce in general must be considered critical to ensure that the Policy framework and action plan serves as a tool for improving the professional environment, optimizing the skills and potential of all staff, and consequently, enhancing the quality of professional life and increasing productivity.

To prepare this document, we collaborated with Mar Gaya (from Igualando) and Sergio Barma (from Bama Psicología).

- Our first meeting with Mar was in July 2024 and since then, we had 13 meetings that allow us to develop the Pay Equity Record or the comprehensive Harassment Protocol among others. She will also give in June 2027 an Equality Training session, which will address gender bias and the promotion of equality at Filmin.
- 6 meetings since October 2025 were held with Sergio, allowing us to review the comprehensive harassment protocol and to define the investigation phase.

Apart of these meetings and collaborations, to elaborate this document, a process was conducted to identify equality-related needs based on a diagnosis of the current situation regarding the position of women and men within the company. This was done to detect any inequalities that may require the adoption of corrective measures.

Achieving real equality and inclusiveness means not only avoiding sex-based discrimination (equal treatment) but also ensuring equal opportunities for women and men in terms of access to employment, hiring and working conditions, promotion, training, remuneration, reconciliation of personal, family, and professional life, and occupational health.

Institutional Framework

Equal opportunities is a general principle composed of two key aspects: equal treatment between individuals and equality between women and men. In 1957, the Treaty establishing the European Economic Community enshrined the principle of equality between women and men. As such, the recognition of the principle of equality is part of the European Union's (EU) objectives. Since 1975, a series of directives have expanded the application of the principle of equality between women and men to working conditions, vocational training and promotion, social security, access to goods and services, maternity protection, and parental leave.

- The Treaty of Amsterdam:
 - a. It allowed for the integration of the gender dimension across all community policies and transformed the principle of equal treatment into a fundamental right.
 - b. The EU also recognized the principle of non-discrimination, which serves as one of the foundations in the fight against unequal treatment.
- The Treaty of Nice:
 - a. It recognized the need to undertake positive actions to encourage the participation of women in the labour market.
- The Treaty of Lisbon:
 - a. It made the principle of equality between men and women a common value of the EU, promoting equality and the fight against inequalities within the framework of its actions.
- The Charter of Fundamental Rights of the EU:
 - a. Adopted in December 2000 and integrated into the Treaty of Lisbon in 2009, it contains a chapter titled "Equality" which includes, among others, the principles of non-discrimination and equality between women and men.

At the national level (Spain):

- Article 14 of the Spanish Constitution of 1978 proclaims the right to equality and non-discrimination on the basis of sex.
- In 1983, Spain ratified the Convention on the Elimination of All Forms of Discrimination against Women, approved by the United Nations General Assembly in December 1979.
- Organic Law 3/2007, for the effective equality of women and men, aims to give effect to the right of equal treatment and opportunities between women and men, particularly through the elimination of discrimination against women, regardless of their circumstances or condition, in any sphere of life—specifically in the political, civil, labour, economic, social, and cultural spheres. It provides for measures intended to eliminate and correct all forms of sex-based discrimination in both the public and private sectors.

Likewise, article 45 of the same legal text establishes that companies are obliged to respect equal treatment and opportunities in the workplace. To this end, they must adopt measures aimed at avoiding any type of labour discrimination between women and men; these measures must be negotiated, and where appropriate agreed upon, with the legal representatives of the workers.

- Royal Decree 901/2020, which regulates equality plans and their registration.
- Royal Decree 902/2020, on equal pay between women and men.
- Law 10/2021, on remote work, a regulation within the Spanish legal system with the status of law that regulates remote work, that is, those persons who voluntarily and for remuneration, as well as with dependence on the employer and within their scope of organization and direction, carry out their work remotely on a regular basis.
- Organic Law 10/2022, on the comprehensive guarantee of sexual freedom, which regulates the duties of prevention and awareness in the workplace and equates victims of sexual violence with victims of gender-based violence or terrorism.
- Law 4/2023, for the real and effective equality of trans people and for the guarantee of the rights of LGBTBI people.

GENERAL CHARACTERISTICS OF FILMN'S WORKFORCE

1. Parity Ratios

The parity ratios required by law (60%-40%) are met. We are actually in 55%-45%.

2. Age Distribution

Age is a variable that can lead to unequal opportunities, as it is often linked to work-life balance (reproductive age or caregiving) or a risk of social exclusion, specifically regarding difficulties in accessing the labor market for women over 55. In the case of the company, there are no differences between women and men, which falls into the 21-to-45 ages. Regarding the risk of social exclusion, it is worth noting that 80% of employees aged 50 or older are women, which reflects the company's commitment to maintaining senior female talent and ensuring their continued tenure in an age bracket typically vulnerable to labor exclusion.

3. Distribution by Seniority

Currently, the company presents a healthy renewal rate: 38% of the workforce falls within the 0-to-3-year seniority range. In this bracket, there are no significant differences between genders (52% 48%). This balance in new hires ensures that both genders have equal starting opportunities to progress toward decision-making roles as they build their tenure within the organization.

4. Distribution by Professional Category and Education

Although there are no differences in the level of formal education between men and women, female over-qualification is observed; this is not reflected in positions that require specialized or higher education.

Strategic framework

The following principles serve as the strategic framework, setting the operational guidelines, orienting its interpretation, and establishing the criteria for its proper implementation:

- Universality: This plan is designed for the entire workforce.
- Transversality: It acts as the company's backbone regarding equality, streamlining processes and fostering synergies across different functional areas and levels of responsibility.
- Participation: Participation must be encouraged through dialogue and cooperation between all parties (management, social partners/unions, and workforce as a whole).
- Prevention: To be considered a tool for anticipation and improvement to prevent future situations of sex-based discrimination.
- Feedback: It is defined as an open, flexible plan, adaptable to changes and necessary corrections based on needs that arise during its term and monitoring process.
- Efficiency: It stems from a corporate commitment that will guarantee the human and material resources required for its implementation, monitoring, and evaluation.
- Access: The plan must be available to the entire workforce through internal communication channels and the Monitoring Committee.

These principles apply to the entire workforce of Comunidad Filmin, S.L. and they shall apply to all new hires who join the staff during its term of validity.

Inclusive and Diverse voice

In addition to the previous principles, due to our inherent nature, Filmin will continue to curate permanent collections and rotating sections dedicated to equality, diversity, and inclusion, seeking the engagement of major organizations within the sector.

Through a rigorous selection of films and documentaries, we provide subscribers with critical tools to understand the present and its diversity. Filmin will leverage its editorial capacity to act as a catalyst for change and lead the conversation within the streaming industry.

Short-term action plan (2026-30)

The plan is conceived not merely as a set of objectives or activities, but as an organizational culture. The objective is for Filmin to become a reference in diversity and inclusion within the streaming industry.

Promotion of gender parity by department and professional group

- Objective: To balance the distribution of the workforce in underrepresented professional groups and departments.
- Activities:
 - Setting specific gender parity targets for a defined period.
 - Involving all parties participating in selection processes.
- Indicators:
 - % of men and women by professional group.
 - % of men and women by area.
 - Number of male and female candidates per selection process.

Annual dashboard analysis

- Objective: To share information about activities developed, and results obtained regarding equality.
- Activities: Preparation of the annual dashboard for people processes: selection, hiring, training, promotion, and work-life balance.
- Indicators: Annual report on selection processes.

Prioritizing the recruitment of women in underrepresented areas

- Objective: Assuming equality of merit, ability, and competence regarding the job requirements, to facilitate gender parity by groups, departments, and hiring methods.
- Activities:
 - Reaching a consensus on the organizational areas to be balanced with all parties involved in selection processes.
 - Incorporating this criterion into decision-making regarding staff selection.
- Indicators:
 - Number of female candidates in selection processes for positions with female underrepresentation.
 - Number of women hired.

Equality training for the monitoring committee

- Objective: To train the members of the Monitoring Committee in equality policies and, specifically, in the roles and execution of specific responsibilities.
- Activities: Holding a joint training and working session with two goals:
 - Training in equality policies and monitoring actions.
 - Distribution of roles and responsibilities for Committee members regarding the execution and monitoring of these actions.
- Indicators:
 - Session held and documentation registered.
 - Consented and accepted responsibilities.



Management training

- Objective: To sensitize the organization's management team to the need to manage people from a gender perspective.
- Activities: Conducting awareness and training sessions covering the following indicative content:
 - Presentation of workforce distribution and data on training received by gender.
 - Presentation of actions related to promotion and training.
- Indicators:
 - Impact of actions on the management role.
 - Number of training actions carried out.
 - Number of participants (managers).

Internal equality training by the monitoring committee

- Objective:
 - To inform and train the workforce through meetings held during working hours.
 - To raise awareness and train the general workforce—and especially staff related to company organization—on equal treatment and opportunities to guarantee objectivity and equality between women and men in selection, classification, promotion, access to training, etc.
- Activities:
 - Development of a dissemination, disclosure, and training plan.
 - Execution of the dissemination and training plan.
- Indicators:
 - Dissemination and training plan completed.
 - Number of informed people / total number of employees.
 - Number of disclosure actions conducted.
 - Record of actions, content, and participants.

Equality awareness in the onboarding process

- Objective: To train new hires on equality matters.
- Activities: Inclusion of modules, notices, and information on equality in training aimed at new staff, including middle management.
- Indicators:
 - Number of new hires trained.
 - Updated onboarding plan and included equality documents.

Prioritizing the promotion of women in underrepresented areas

- Objective: Assuming equality of merit, ability, and competence regarding the job requirements, to facilitate gender parity by groups and departments in promotions.
- Activities:
 - Reaching a consensus on the organizational areas to be balanced with all parties involved in promotion processes.
 - Incorporating this criterion into decision-making regarding staff selection.

- Indicators:
 - Number of female candidates in promotion processes for positions with female underrepresentation.
 - Number of women promoted.

Boosting internal vacancy filling

- Objective: To establish that, for internal vacancies, current staff will have priority over external hiring.
- Activities: Incorporation of the principle into internal selection procedures and its application.
- Indicators:
 - Number of internal male and female candidates per vacancy process.
 - Description of the preference principle for internal coverage through current staff.

Linking positive equality actions with agencies or institutions

- Objective: To agree with NGOs or other institutions/agencies on sponsorship or collaboration regarding Equal Opportunities.
- Actions: Identification of institutional events suitable for collaboration on Equality. Inclusion of equality mentions in said events or acts.
- Indicators: Number of sponsorships that incorporate equal opportunities.

Medium-term action plan (2030-36)

The primary focus for the medium-term action shifts from establishing foundations and protocols toward consolidation, impact measurement, and a deep-rooted corporate culture.

The general objective is to consolidate equal treatment and opportunities as a strategic and cross-cutting value within the company, ensuring that the diverse and inclusive perspective is automatically integrated into all business decisions, talent management, and content creation, while eliminating any gaps detected in the previous period.

Leadership & Promotion

- Objective: To foster the presence of women in top-level management and strategic decision-making positions.
- Activities: Female mentoring programs and review of succession plans.
- Indicators: Percentage of women on the Management Committee.

Process Management

- Objective: To guarantee pay equity and the elimination of bias in selection processes.
- Activities: Annual salary audits and implementation of "blind" CVs.
- Indicators: Evolution of the adjusted gender pay gap (Target: < 5%).

Culture & Image

- Objective: To project equality as a brand value both internally and externally.
- Activities: Non-sexist communication guide and gender perspective analysis of the catalog.
- Indicators: Usage rate of flexibility/work-life balance measures by men.

Safe Environment

- Objective: To ensure a zero-tolerance environment regarding harassment and microaggressions.
- Activities: Specific climate surveys and continuous training on new forms of harassment (digital).
- Indicators: Level of satisfaction and perception of equality in the annual climate report.

Real Co-responsibility

- Objective: To encourage male staff members to utilize work-life balance and caregiving measures in a balanced manner to prevent career penalties for women.

Occupational Health with a Gender Perspective

- Objective: To integrate factors that differentiate impact on men and women (psychosocial risks, ergonomics, and hormonal health) into risk prevention protocols.

Summary of actions

Action	Objective	Phase	KPIs
Gender Parity Promotion	Balance workforce distribution in underrepresented groups and areas	2026-30	% of men/women by professional group and area; candidates per selection process
Annual Dashboard Analysis	Share information regarding equality activities and results	2026-30	Annual report on selection processes
Prioritizing Female Recruitment and Promotion	Facilitate gender parity in underrepresented areas (assuming equal merit)	2026-30	N. of female candidates in underrepresented positions; number of women hired
Equality Training (Committee & Management)	Train and sensitize on gender perspectives	2026-30	Training sessions held; N. of participants; Impact on management
Internal Vacancy Filling	Prioritize current staff for internal vacancies over external hiring	2026-30	N. of internal male/female candidates per vacancy
Leadership & Promotion	Foster female presence in top-level management and strategic positions	2030-36	% of women on the Management Committee
Process Management	Guarantee pay equity and elimination of bias in selection processes	2030-36	Evolution of the adjusted gender pay gap (<5%)
Safe Environment	Ensure a zero-tolerance environment regarding harassment and microaggressions	2030-36	Level of satisfaction and perception of equality in the annual climate report

Governance - monitoring

The ultimate responsibility for the execution of the plan lies with the Management Committee and the Monitoring Committee.

The monitoring of the measures will be conducted periodically. At least one midterm evaluation and one final evaluation will be conducted, as well as whenever agreed upon by the Monitoring Committee. In this case, the Monitoring Committee will conduct both monitoring and evaluation of the plan.

Who composes the Monitoring Committee?

Representatives from the company and the signatory trade union organizations.

What are the (indicative) functions of the Monitoring Committee?

- Monitor compliance with the actions proposed.
- Advise on the implementation methods of action.
- Evaluate the actions implemented.
- Prepare the annual report detailing the progress achieved regarding equality objectives within the company.

To guarantee the fulfillment of the Monitoring Committee's functions, the company shall be responsible for making all necessary and requested information available to them, as well as providing the resources for their meetings.

How does the Monitoring Committee operate?

The committee will meet every six months. However, extraordinary meetings may be held whenever necessary, following prior notice to its members.

If any member of the Committee is unable to attend a meeting, they may temporarily delegate their position to another person within the company who possesses the necessary qualities, provided that one week's notice is given and it is approved by the rest of the members.

Decisions and agreements of the Monitoring Committee must be passed by an absolute majority to be valid.

Risk assessment and mitigation

The company acknowledges the ambitious nature of the plan proposed, which is not without risks that could potentially impede its full execution. Among the primary risks identified are:

Project coordination and alignment

Delays in decision-making or internal misalignment between teams could stall implementation and affect the timely delivery of milestones and reports.

- **Probability:** Medium.
- **Impact:** High.
- **Mitigation:** Establishing a formal governance structure from the project's inception, with clearly defined roles, decision-making rights, and escalation pathways.

Risk of Career Penalties for Women

If only women utilize work-life balance measures, they may face professional disadvantages.

- **Probability:** Low.
- **Impact:** High.
- **Mitigation:** Promote "Real Co-responsibility" by actively encouraging male staff members to utilize caregiving and work-life balance measures in a balanced manner.

Digital Harassment

Creation of new forms of digital harassment as a potential threat to a safe environment.

- **Probability:** Medium.
- **Impact:** High.
- **Mitigation:** Implement continuous training specifically focused on digital harassment and conduct regular climate surveys to monitor the environment.

Management Resistance or Lack of Awareness

Success depends on the management team's ability to lead with diversity and inclusion.

- **Probability:** Low.
- **Impact:** Medium.
- **Mitigation:** Conduct mandatory management training and awareness sessions to sensitize the leadership team to equality-perspective people management

Towards a diverse and inclusive transition

In the current global context, social progress and the defence of fundamental rights are not merely ethical choices but essential pillars for any forward-looking organization. Diversity and inclusion are not immaterial concepts; they are a core part of our business.

Filmin has made the steadfast decision to become an active leader in the field of equality, diversity and inclusion. This policy framework and action plan is not a mere rhetorical exercise; rather, it is the continuity and development of a strategic, quantifiable, and rigorous roadmap to have the clear objective of achieving real parity and equality.

The primary challenge lies in dismantling unconscious biases and ensuring that our growth as a company translates into a more balanced and fairer social environment for all. Filmin's vision for equality extends far beyond workforce statistics. The company maintains that a genuine transition toward the future must be, by definition, diverse and inclusive.

Furthermore, the company is aware that one of its most powerful tools for social change is not found within its protocols, but in its catalogue. Through an "Inclusive and Diverse voice", we can commit to utilize cinema as a catalyst for empathy and equity. Our goal is to inspire, accompany, and equip our audience with the critical tools necessary to understand, respect, and celebrate the diversity of the world.

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