

Gender Equality Plan (GEP)

Change history

Date	Description of the change/update	Author
03/2026	Original version & management approval	Jacob Demeyer, Chris Derde

Purpose and Commitment

The Hirundo Group of Companies is committed to promoting gender equality, diversity, and inclusion across its organisations and project activities. Hirundo recognises that equal participation of women and men is essential for responsible business practices, sustainable development, and thereby the effective implementation of renewable energy projects.

This Gender Equality Plan (GEP) aims to:

- Promote equal opportunities in recruitment, career development, and leadership;
- Encourage gender balance and diversity within the workplace and in decision-making roles;
- Create a professional environment based on respect, inclusion, and fairness;
- Prevent discrimination, harassment, and gender-based misconduct in the workplace;
- Raise awareness of gender equality and unconscious bias among staff and decision-makers;
- Ensure that appropriate resources, expertise, and monitoring mechanisms are in place to support gender equality within the organisation.

Hirundo is committed to aligning its internal policies and practices with applicable national legislation and internationally recognised standards related to gender equality.

Gender discrimination, harassment, or unequal treatment are incompatible with Hirundo's values and may constitute grounds for action in accordance with applicable company policies and contractual arrangements.

Scope of Application

This Gender Equality Plan applies to all employees of **Hirundo Horizon CV, Hirundo Energy BV, Hirundo Lesotho (Pty.) Ltd., and Mohale's Hoek Wind (Pty.) Ltd** (together "Hirundo"). Hirundo also promotes adherence to the principles of this Plan among contractors, subcontractors, consultants, suppliers, and other partners, and will require compliance with applicable laws and policies of the Government of Lesotho.

The principles and measures set out in this Code apply across **all activities**, including project development, engineering services, and operational support functions.

This Code applies throughout **all phases** of Hirundo’s project activities and **at all times** and **in all locations** where individuals are engaged in, representing, or otherwise connected to Hirundo’s operations, including interactions with colleagues, contractors, partners, and host communities.

Where relevant, this plan complements and reinforces other Hirundo policies addressing professional conduct, workplace respect, and the prevention of harassment and misconduct.

Definitions

- **Gender equality:** Equal rights, responsibilities and opportunities of women and men and girls and boys. Or related **Equal Opportunities:** Absence of barriers to economic, political and social participation on grounds of sex and gender.
- **Equal Treatment:** A state of no direct or indirect discrimination based on sex and gender, including less favourable treatment of women for reasons of pregnancy and maternity.
- **Gender Balance:** Human resources and equal participation of women and men in all areas of work, projects or programmes.
- **Gender (Unconscious) Bias:** Prejudiced actions or thoughts based on the gender-based perception that women are not equal to men in rights and dignity.
- **Gender-Based Discrimination:** Discrimination occurring due to interaction between sex (as the biological characteristics of women and men) and their socially constructed identities, attributes and roles and society’s social and cultural meaning for biological differences between women and men.
- **Gender-Based Violence:** Violence directed against a person because of that person’s gender, gender identity or gender expression, or which affects persons of a particular gender disproportionately.
- **Harassment:** Unwanted conduct related to the sex of a person occurring with the purpose or effect of violating the dignity of that person, and of creating an intimidating, hostile, degrading, humiliating or offensive environment

Source: <https://eige.europa.eu/publications-resources/thesaurus> (European Institute for Gender Equality)

Legal and Policy Framework

This policy and these procedures are aligned with

National Laws of Lesotho

Legal and policy framework	Requirements / relevance for gender equality
Constitution of Lesotho (1993)	The Constitution establishes the fundamental principles of equality and non-discrimination. It provides the legal foundation for equal rights and opportunities for all citizens and supports policies aimed at ensuring fairness and

	protection of human dignity, including equality between women and men.
Labour Act (2024)	The Act establishes the legal framework governing employment relations and workplace conditions in Lesotho. It includes provisions promoting fair labour practices, protections against workplace discrimination and harassment, and expanded leave entitlements including maternity, paternity, family, bonding and compassionate leave. These provisions support equal participation of women and men in the workplace.
Children’s Protection and Welfare Act No. 7 of 2011	This Act provides a legal framework for protecting the rights, safety and welfare of children. It addresses abuse, neglect, exploitation, child labour and trafficking and prioritises the best interests of the child. It contributes to gender equality by protecting girls and boys from exploitation and promoting safe social and community environments.
Penal Code Act No. 6 of 2012	The Penal Code establishes criminal offences including sexual offences, abuse, trafficking and other forms of exploitation. It provides the legal basis for addressing gender-based violence and protecting individuals from abuse and harassment.
Gender and Development Policy (2018–2030)	The policy provides the national framework for promoting gender equality and mainstreaming gender considerations across development sectors. It promotes equal participation of women and men in economic, political and social life and aims to address structural inequalities through a rights-based approach to development.

International Standards and Guidelines

- CEDAW
- ILO Convention 111
- ILO Convention 190
- Sustainable Development Goals (especially SDG 5)
- IFC Performance Standards.

Baseline Situation

Hirundo is a growing organisation composed of professionals from diverse backgrounds in engineering, finance, project development, and administration.

As a technical company operating in the renewable energy sector, Hirundo strives to promote equal representation of women and men across its activities. The company recognizes that women often remain underrepresented in engineering and infrastructure professions and therefore actively supports gender equality in recruitment and career development.

Hirundo aims to ensure that:

- recruitment procedures are fair and non-discriminatory,
- professional opportunities are based on qualities and competence,
- working conditions support work-life balance,
- employees are treated with respect regardless of gender.

The company periodically reviews and reports on its staff composition and working practices to identify opportunities for improving gender balance and equality.

Measures and Actions

Equal Opportunities in Recruitment and Career Development

Hirundo is committed to ensuring equal opportunities in hiring and career development. Measures include:

- Ensuring that job advertisements are gender-neutral and inclusive;
- Evaluating candidates based on competence, experience, and qualifications;
- Encouraging applications from underrepresented groups where appropriate;
- Ensuring equal access to professional development and training opportunities.

Work-Life Balance and Inclusive Working Culture

Hirundo supports a working environment that enables employees to balance professional and personal responsibilities. Measures include:

- Promoting flexible and reasonable working arrangements where feasible;
- Fostering a respectful workplace culture;
- Supporting an organizational culture that values diversity and inclusion.

Prevention of Harassment and Gender-Based Misconduct

Hirundo is committed to preventing harassment, discrimination, and gender-based violence, including sexual harassment and exploitation. Relevant measures include:

- Implementation of a Code of Conduct and workplace policies addressing professional behavior and respect;
- Awareness of procedures for reporting concerns or grievances;
- Appropriate handling of complaints in a confidential and fair manner. Allegations of misconduct will be reviewed promptly and impartially, and where appropriate may involve independent assessment to ensure fairness and protection of all parties.

These measures apply to employees, consultants, and partners engaged in Hirundo's activities.

Training and Awareness Raising

Hirundo promotes awareness of gender equality and inclusive workplace practices. Measures include:

- Awareness-raising sessions on gender equality for staff and management;
- Training on unconscious bias and inclusive professional practices where relevant;

- Engagement of external experts or trainers when appropriate to deliver specialized training.
- Training may take the form of workshops, presentations, or external training sessions.

Dedicated Resources and Expertise

Hirundo commits to allocating appropriate resources for the implementation of this Gender Equality Plan. These resources may include:

- Time and attention from management to oversee implementation;
- Internal coordination of gender equality actions;
- Engagement of external gender equality consultants or trainers to provide specialized expertise when required.

Monitoring, Reporting and Grievance Mechanism

Hirundo will periodically review the implementation of this Gender Equality Plan. Monitoring may include:

- Review and reporting on workforce composition;
- Review of recruitment and promotion practices;
- Documentation of gender equality training or awareness-raising activities;

Where appropriate, management will document actions taken under this plan and identify potential improvements.

Roles and Responsibilities

The implementation of this Gender Equality Plan requires the commitment and participation of all members of the Hirundo Group of Companies.

Management, Managers and Supervisors

- Ensure implementation of this Gender Equality Plan across Hirundo's activities.
- Promote equal opportunities and an inclusive workplace culture.
- Ensure fair treatment in recruitment, task allocation, and career development.
- Address concerns related to discrimination, harassment, or unequal treatment.
- Support awareness-raising and gender equality initiatives.

Employees and Associated Personnel

- Contribute to a respectful and inclusive working environment.
- Comply with this Gender Equality Plan and related workplace policies.
- Report concerns related to discrimination, harassment, or unequal treatment through appropriate channels, preferably to the company-wide Grievance Redress Mechanism Submission Form

External Advisors or Experts (where applicable)

- Provide expertise on gender equality measures and training.
- Support the implementation and continuous improvement of gender equality practices.

Entry into Force, Review and Updates

These procedures enter into force upon approval by management and shall remain in force until amended or replaced. The policy shall be reviewed at least annually, and updated as necessary, to ensure continued compliance with applicable national laws, alignment with Hirundo's policies and values and incorporation of lessons learned from implementation.

Approved by:

Jacob Demeyer

Permanent representative Hirundo Energy, Director **Hirundo Horizon CV**

Director **Hirundo Energy BV**

Managing Director **Hirundo Lesotho (Pty.) Ltd.**

Director **Mohale's Hoek Wind (Pty.) Ltd.**

Date: 01/04/2026

Signature