BFBHR

Report

Power in the Shadows:

Equality as a Driver of Sustainable Business



• 2025 •

Power in the Shadows: *"The Office as a Space for Strength and Empowerment"*

Report on a monitoring study conducted under project The Office as a Space for Strength and Empowerment. The project is implemented under the Bulgarian Fund for Women's 'FORCE' Programme, co-financed by the European Union.

Milena Stateva, author and researcher

Olya Peneva, co-author and researcher

Diana Georgieva, researcher

Editing and proofreading: Redaktorite BG

Translation: Redaktorite BG

Design: By Danish



Funded by the European Union

BULGARIAN FUND FOR WOMEN

Bulgarian Foundation for Business and Human Rights (BFBHR)

2025

The analysis was conducted within the framework of the project "*The Office as a Space for Strength and Empowerment*", implemented by the Bulgarian Foundation for Business and Human Rights (BFBHR) under the FORCE Programme of the Bulgarian Fund for Women, which is co-funded by the European Union. The aim of the study is to examine publicly available information regarding the commitment, policies and actions of businesses in Bulgaria in the areas of gender equality, diversity and the prevention of gender-based violence and harassment in the workplace.

The analysis applies the Gender Benchmark methodology of the World Benchmarking Alliance (WBA), seeking to assess the positioning of Bulgarian companies in relation to global standards and to identify existing gaps that may be addressed through targeted measures and initiatives.

The Bulgarian Foundation for Business and Human Rights wishes to express its gratitude to the Bulgarian Fund for Women for supporting the implementation of this pilot study, as well as the entire team for their dedication throughout the process of researching and analysing available information.

Special thanks are due to Milena Stateva, PhD in Sociology, social psychologist, and process consultant, who acted as lead author and analyst of the report.

The authors would also like to thank the companies that took part in the assessment and acknowledged the value of engaging with the study. The next phase of the project will involve participation in training sessions, during which guidance will be provided on several of the recommendations set out in the report.

This publication was produced with the financial support of the Bulgarian Fund for Women and the European Union. The views and opinions expressed are solely those of the author or authors and do not necessarily reflect those of the Bulgarian Fund for Women, the European Union, the European Commission Directorate-General for Justice and Consumers, or the European Commission. Neither the Bulgarian Fund for Women nor the European Union or the European Commission may be held responsible for them.

TABLE OF CONTENTS

Executive Summary **6**

Power in the Shadows: Equality as a Driver of Sustainable Business 6

Introduction: The Power We Deserve 10

1. Aim and Scope of the Study **12**

2. Intellectual and Practical Context **13**

Global Role of the Corporate World 13

Situation in Bulgaria regarding Sexual Harassment in the Workplace 15

Importance of Internal Policies and Training 17

3. Project The Office as a Space for Strength and Empowerment **19**

Methodology 19

Tools and Standards for Gender Equality in Business – Importance and Benefits 21

Limitations and Observations 24

4. Observations and Trends by Clusters of Indicators **28**

4.1. Strategies and Commitments 28

4.2. Human Rights 32

4.3. Supply Chain 34

4.4. Stakeholders and Internal Communication 36

4.5. Grievance and Rights Protection Mechanisms 39

4.6. Violence, Harassment and a Safe Working Environment 41

4.7. Other Indicators 44

4.8. Summary Observations: Examples of Strong and Weak Practices across Clusters 46

5. Conclusions and Recommendations **50**

List of sources **54**

LIST OF ABBREVIATIONS

BFBHR	Bulgarian Foundation for Business and Human Rights
BFW	Bulgarian Fund for Women
EU	European Union
EC	European Commission
CITUB	Confederation of Independent Trade Unions in Bulgaria
ILO	International Labour Organization
MLSP	Ministry of Labour and Social Policy
NGO	Non-governmental organisation(s)
UN	The United Nations
WBA	World Benchmarking Alliance
FES	Friedrich Ebert Foundation
GPA	Global Parity Alliance
GRI	Global Reporting Initiative
OECD	Organisation for Economic Co-operation and Development

Executive Summary

Power in the Shadows: Equality as a Driver of Sustainable Business

A study informed by data, insights and challenges to guide the way forward

The report sets out the findings of the first pilot study of its kind in Bulgaria to apply the World Benchmarking Alliance's Gender Benchmark Methodology[1] to assess publicly available information from 20 companies operating in the country. The study seeks to determine the extent to which companies that have committed to sustainable business practices demonstrate transparency and provide accountability regarding the existence and implementation of gender equality principles within their structures, processes, supply chains and stakeholder engagement.

This marks an initial step toward the systematic collection of evidence, the exchange of good practices, and the development of common standards that define what it means to be an employer and partner committed to the rights of women and girls in Bulgaria.

Methodology

The assessment is based on the internationally recognised Gender Benchmark framework developed by the World Benchmarking Alliance. It comprises 30 indicators structured around six core themes:

1. Governance and Strategy
2. Representation
3. Compensation and Benefits
4. Health and Well-being
5. Gender-based Violence and Workplace Harassment
6. Marketplace and Community.

The study focuses primarily on two of these areas – Governance and Strategy and Gender-based Violence and Workplace Harassment, which are further organised into the following seven clusters:

1. Governance and Objectives
2. Human Rights
3. Supply Chain
4. Stakeholders and Internal Communication
5. Grievance Mechanisms
6. Harassment and a Safe Working Environment
7. Training, Measurement and Internal Processes

Each company is assessed on a scale of fulfilled, partially fulfilled or not fulfilled, on the basis of publicly available information only. The selection of companies follows the guidance of the World Benchmarking Alliance, in particular by avoiding companies already included in international studies of good practice and by prioritising the local application of policies. Nonetheless, certain companies are also subject to analysis by the World Benchmarking Alliance. In such cases, they are compared with other benchmarks, such as the Social Benchmark or assessments of corporate performance in human rights.

Key conclusions

- *Systemic lack of transparency* – most companies do not publish sufficient information related to gender equality, particularly in sensitive areas such as workplace harassment, grievance mechanisms, or supply chains.
- *Good examples, but lacking sustainability* – isolated good practices can be identified (for example in target-setting, diversity and inclusion initiatives, neurodiversity, or grievance procedures), yet these are often fragmented, inconsistent, or not supported by public reporting.
- *Lack of alignment with human rights commitments* – gender equality is rarely framed as an integral part of a company's broader human rights commitment. Anti-discrimination policies are often merely formal statements without a clear operational dimension.

1 World Benchmarking Alliance. Gender Benchmark Methodology. April 2023. Available online at: https://assets.worldbenchmarkingalliance.org/app/uploads/2024/05/2023-Gender-Benchmark-Methodology-3-May-2024.pdf (September 2025).

- *Limited internal capacity* – companies lack adequately trained teams, internal mechanisms or monitoring processes that would enable the effective integration of gender equality principles into organisational practice.

Recommendations

1. Develop publicly available corporate policies with measurable commitments – companies should formulate and publish clear objectives and concrete actions in the area of gender equality.
2. Engage with issues related to workplace harassment by establishing prevention and support policies, processes and mechanisms.
3. Join international initiatives – such as the UN Women's Empowerment Principles (WEPs), EDGE Certification, the Bloomberg Gender Equality Index and other tools for external verification and continuous improvement.
4. Put in place grievance mechanisms, training and accountability structures – including clear differentiation between types of complaints (harassment, discrimination, whistleblowing) and training programmes targeted at employees.
5. Increase transparency in reporting on environmental, social and governance aspects and supply chains, including by collecting gender-disaggregated data and conducting gender-responsive risk assessments.
6. Establish partnerships with non-governmental and expert organisations to jointly develop policies and programmes, build internal capacity, and support companies in conducting assessments of the risks of adverse human-rights impacts as part of wider due-diligence processes.
7. Advocate for the ratification of the International Labour Organization (ILO) Convention on Violence and Harassment in the World of Work as a key standard for addressing these issues. The ratification of this convention is a positive example of cooperation between the state and the business sector. Its incorporation into Bulgarian legislation would provide companies with clear guidance and direction on how to address violence and harassment in the world of work more effectively.

Report map

- Introduction and context – why this report matters today
- Methodology and applied frameworks – the WBA Gender Benchmark
- Observations and trends by cluster – an overview of good practices and existing gaps
- Synthesis of examples of good practice, presented in a consolidated table of inspiring actions
- Recommendations and conclusion – a pathway towards greater equity.

In conclusion

The report is an invitation to dialogue, action and collaboration. We believe that within companies there are people – professionals, leaders and visionaries – who strive to make the best possible choices and to build increasingly just and equitable structures. We hope that this analysis will serve as a resource, a source of support and an inspiration for taking the next steps.

Introduction: The Power We Deserve

Meaningful change begins with the courage to acknowledge what remains unseen and the responsibility to act upon it. This report examines a small sample of Bulgarian companies and their practices in relation to gender equality. The study serves as an invitation to conscious leadership for those who shape organisational policies and culture.

Each company is examined individually, considering the different structures and relationships operating within specific processes and systems. The common denominator is people, whether leaders and visionaries with the capacity to bring about significant change or individuals who, drawing on their accumulated experience, seek to improve the environment in which they work.

The study is limited by the fact that it includes companies that differ in structure, size and scope of activity. They also vary in terms of ownership, with some being fully Bulgarian owned and others and others having international ownership structures. What they have in common is that, at their core, they are communities of people. Our study does not seek to present a comprehensive overview of the situation in Bulgaria. Its purpose is to identify qualitative characteristics and illustrative material drawn from a convenience sample that is sufficiently broad and diverse to initiate an open dialogue on the subject.

The structure of the report guides the reader carefully and progressively towards an alternative vision of the business landscape in Bulgaria. It begins with an overview of the international and national regulatory frameworks, followed by the assessment methodology, including its context and justification. A consolidated analysis of the results is then presented by a well informed and well-trained team of social scientists and human rights experts. The main body of the report sets out cluster-based observations, offering a detailed assessment of publicly disclosed practices in areas such as governance and strategic development, human rights, supply chains, internal communication and grievance mechanisms.

An important added contribution of the report is the identification of good practices within companies, incorporated at the request of participants in the assessment and data analysis process. The information is presented in tabular form and includes anonymised examples from companies that demonstrate positive practices and a commitment to progress. The report concludes with findings and recommendations, offering concrete guidance for improvement with a focus on training, internal accountability and opportunities for partnership.

According to the report, none of the companies assessed fully meets all indicators for gender equality. Nevertheless, significant progress is increasingly observed in areas such as training, employee resource groups, stakeholder engagement and external partnerships. The lack of systematic approaches, public accountability and a deep understanding of gender equality remains a major challenge. The recommendations also emphasise the need for training, structured grievance mechanisms, improved engagement with suppliers in supply chains and greater transparency.

The report offers an opportunity for reflection and self-assessment. Above all, it represents an invitation to transformation. The true strength of a company does not lie in performance metrics but in its capacity to care for the people who generate its value.

1. Aim and Scope of the Study

In 2025 and 2026, the Bulgarian Foundation for Business and Human Rights (BFBHR) has been implementing the project entitled *The Office as a Space for Strength and Empowerment*, funded under the Bulgarian Fund for Women's FORCE Programme and co-financed by the European Union. The project introduces, for the first time, an analytical review of the policies of leading companies in Bulgaria in relation to diversity, gender equality and the prevention of gender-based violence.

The assessment is grounded exclusively in publicly available information and is undertaken by trained experts with knowledge and experience in gender equality, human rights and corporate sustainability. It applies WBA's Gender Benchmark Methodology[2], adapted to the Bulgarian context and to the objectives of the project.

The study includes companies with an established market position and significant influence in the country. Although they operate in different sectors, the aim is not to compare them with one another but to determine the state of the business environment in relation to the factors of workplace equality and safety. The analysis does not draw on internal or confidential information, nor is it based on interviews or questionnaires. It relies entirely on easily verifiable, publicly available sources that indicate the presence, or absence, of specific policies.

The sources used include sustainability reports, sample policies, company websites and media publications. Conversations with company representatives led to the conclusion that the publicly available information does not fully reflect the actions they undertake. Even so, it provides a timely indication of where they position themselves and how they present their activities related to equality to the wider public.

The purpose of the analysis is to outline the current situation, identify good practices and gaps, and formulate concrete recommendations. The report summarises the main trends, challenges and opportunities identified throughout the process and is intended to inform the general public. It can also serve as a basis for developing training, resources and policies aimed at building fairer and more sustainable workplaces in the Bulgarian private sector, with a focus on equality and respect for human rights.

2 World Benchmarking Alliance. Gender Benchmark Methodology April 2023. Available online at: https://assets.worldbenchmarkingalliance.org/app/uploads/2024/05/2023-Gender-Benchmark-Methodology-3-May-2024.pdf (September 2025).

2. Intellectual and Practical Context

Global Role of the Corporate World

Over the last two decades, the business world has undergone a profound transformation. What was once considered an internal cultural matter has evolved into a domain for the fulfilment of global obligations relating to sustainability, social justice and human rights.[3,4]

The issue of gender equality is a core component of the social dimension within environmental, social and governance (ESG) reporting. In this context, the integration of policies that promote equality and a safe working environment is an important indicator of sound social practice.[5,6] Investors and regulators increasingly assess companies not only on the strength of their financial performance but also on the extent to which they contribute to human well-being, diversity and inclusion.[7,8] The absence of such policies can give rise to reputational or regulatory risks, as well as the loss of talent or investment.[9]

Moreover, gender equality is closely linked to humanity's global aspirations. It is more than simply one of the leading United Nations Sustainable Development Goals (Goal 5). It is a vital condition for achieving several other goals, including decent work and economic growth (Goal 8), reduced inequalities (Goal 10), and peace, justice and strong institutions (Goal 16).[10] Companies play a central role in advancing these goals by developing and imple-

3 Banahan, C. and Hasson. G. (2018). Across the Board Improvements: Gender Diversity and ESG Performance. Harvard Law School Forum on Corporate Governance. Available online at: https://corpgov.law.harvard.edu/2018/09/06/across-the-board-improvements-gender-diversity-and-esg-performance/ (September 2025).

4 Keisse, H.H. and Jaafar, A. (2025). The Impact of ESG Engagement and Gender Diversity on Corporate Investment Efficiency: Evidence from European Listed Firms, Journal of Financial Reporting and Accounting. https://doi.org/10.1108/JFRA-01-2025-0086 (September. 2025).

5 Ojeda, L., Ginieis, M. and Papaoikonomou, E. (2025). Gender Equality in Sustainability Reporting: A Systematic Literature Review, Corporate Social Responsibility and Environmental Management, Jan Issue. https://doi.org/10.1002/csr.3089 (September 2025).

6 Miller, A., Grabski, T., Vegezzi, V. and Garrity, J. (2024). Gender Equality Metrics. Analysis of Stock Exchange Guidance. Available online at https://sseinitiative.org/sites/sseinitiative/files/publications-files/gender-metrics-unsse-ifc.pdf (September 2025 r.).

7 Global Parity Alliance (2023). Diversity, Equity and Inclusion Lighthouses 2023. Available online at https://www.weforum.org/publications/global-parity-alliance-diversity-equity-and-inclusion-lighthouses-2023/ (September 2025 r.).

8 OECD (2017). Responsible Business Conduct for Institutional Investors: Key Considerations for Due Diligence under the OECD Guidelines for Multinational Enterprises. Available online at https://www.oecd.org/en/publications/responsible-business-conduct-for-institutional-investors_8b9e240a-en.html (September 2025 r.).

9 See Silk, D.M., Niles, S.V. and Lu, C.X.W. (2021). ESG and Sustainability: Key Considerations for 2021, Harvard Law School Forum on Corporate Governance. Available online at https://corpgov.law.harvard.edu/2021/01/30/esg-and-sustainability-key-considerations-for-2021/ (September 2025 r.).

10 United Nations, Sustainable Development Goals, https://sdgs.un.org/ (September 2025).

menting clear internal policies, fostering an inclusive culture and creating opportunities for leadership. Most importantly, they do so by taking concrete measures to prevent violence and harassment in the workplace.

Since the adoption of the *United Nations Guiding Principles on Business and Human Rights* (UNGPs)[11] in 2011, companies have been assigned clearly defined responsibilities. They are expected to respect human rights and to address potential adverse impacts on those rights through human rights due diligence. The adverse impacts on the rights of women and minorities have specific dimensions that become more visible within the UNGPs when viewed through the lens of equality.[12]

The Guiding Principles emphasise that business activities affect women and girls in different, and often disproportionate ways because rights holders are not a homogenous group but include individuals from various vulnerable communities. As a result, women and girls frequently face multiple forms of discrimination that require timely and appropriate measures from both the state and the business sector.

It follows that respecting human rights in line with the principles of equality makes it possible to identify distinct vulnerabilities and the ways in which they can be addressed. Both states and businesses share responsibility for supporting women in the context of the impacts that economic activities have on their rights.

The state has a key role in ensuring that businesses respect the rights of women by adopting and enforcing policies, laws and mechanisms for prevention, protection and sanction in cases of discrimination, violence or harassment. It must not only provide guidance but also create incentives and effective sanctions that encourage companies to uphold women's rights across all their activities, including within their supply chains.

Businesses are responsible for respecting the rights of women and minorities, integrating grievance mechanisms, accountability processes and the principles of equality and fairness into their operations. This applies both to internal processes and to their supply chains.

Their responsibility does not end with legal compliance. It also involves a moral commitment and a strategic positioning of the company as a driver of positive change.

Situation in Bulgaria regarding Sexual Harassment in the Workplace

Bulgarian legislation provides the basic legal framework for gender equality through the Constitution, the Labour Code, the Protection against Discrimination Act[13], as well as through the transposition of EU directives and UN conventions. Bulgaria has not yet ratified ILO Convention No 190 of 2019 on violence and harassment[14], which results in the absence of effective measures, forms of protection and clear requirements for companies. Therefore, sexual harassment in the workplace, which is a form of gender-based violence, does not receive the necessary attention, even though it is explicitly recognised as a form of discrimination under the Protection against Discrimination Act. Employers are obliged to respond and take corrective action when a problem is identified. However, there is no legal requirement for mandatory public reporting on gender equality by businesses, apart from voluntary sustainability reports[15] or diversity initiatives introduced in some companies on the basis of good international practices and standards. This is also confirmed in the opinion of the Economic and Social Council of the Republic of Bulgaria (ESC) of 3 June 2022, which notes that Bulgarian legislation lacks laws and legal provisions that would not only prevent cases of workplace harassment but also protect women who face such situations. For this reason, the ESC calls for the Convention to be ratified and incorporated into Bulgarian law.[16]

The 2023 Report on the Equality of Women and Men in Bulgaria, published by the Ministry of Labour and Social Policy[17], covers topics such as women's participation in the labour market, gender segregation by sector, participation in management and care responsibilities. It is important to note that there is no data on the prevalence of workplace harassment, nor is there an analysis of the effectiveness of internal policies or programmes for the prevention

11 UN (2017). United Nations Guiding Principles on Business and Human Rights. (Unofficial translation by the Bulgarian Business and Human Rights Foundation). Available online in Bulgarian at https://bfbhr.org/wp-content/uploads/2024/07/bfbhr-oon-principi.pdf (September 2025).

12 Working Group on Business and Human Rights (2019). Gender lens to the UNGPs. Available online at: https://www.ohchr.org/en/documents/thematic-reports/ahrc4143-report-gender-lens-guiding-principles-business-and-human-rights (September 2025).

13 C190 – Violence and Harassment Convention, 2019 (No. 190). Available online at: https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190. (September 2025).

14 See Harassment and Discrimination in the Workplace. Available online at: https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=67007 (September 2025).

15 Despite the absence of mandatory requirements, many companies issue voluntary sustainability reports. Yet gender-specific information is seldom included. The most common disclosures relate to workforce data and the male-female distribution on boards of directors.

16 Opinion on the Ratification of ILO Convention No. 190/2019 on Eliminating Violence and Harassment in the World of Work https://esc.bg/wp-content/uploads/2025/02/esc_4_019_2022.pdf (September 2025).

17 MLSP (2023). Report on the Equality of Women and Men in Bulgaria. Available online at: https://www.mlsp.government.bg/uploads/41/test/za-ravnopostavenost-na-zhenite-i-mzhete-za-2023-g.pdf (September 2025).

of violence. The 2024 draft report[18] again includes indicators and measures across various areas, including the economy, employment and participation in decision making. The monitoring, however, focuses mainly on indicators related to women's participation rather than on policies addressing discrimination and harassment. It does not examine the impact of company policies or the existence of grievance mechanisms. Human rights organisations, in their submissions during the public consultation, emphasise the lack of mandatory requirements for employers to develop internal policies for protection against gender-based violence. They also support the need to establish a national mechanism for monitoring good practices in the private sector.[19]

As in many other areas, the challenges here do not stem from the national legal framework. It is social attitudes and entrenched practices that raise the greatest concern. A study by the Friedrich Ebert Foundation (FES) and the Confederation of Independent Trade Unions in Bulgaria (CITUB)[20] (2024) shows that **18.9%** of the employees surveyed have been victims of sexual harassment, with **more than 80%** of them being women. According to the study, almost **47%** of those affected do not feel comfortable reporting the incident, and only **35%** perceive their employers as sufficiently proactive. Trade union protection has a positive effect: among those who have experienced harassment, **15.1%** are union members, compared with **53.5%** among non-members. There are, however, no data on the impact of internal company policies, training, processes or mechanisms where such exist, nor is it known whether they exist at all in Bulgaria.

The report emphasises that despite the existence of a legal basis, the fulfilment of obligations is often formal and unsystematic. The lack of regular public reporting and targeted anti-violence policies creates a barrier for victims seeking protection and reinforces a culture of silence. More visible positive practices exist in the trade union sector, for example sectoral collective agreements in healthcare and transport that include clauses on protection from harassment and zero tolerance.

18 Draft Report on the Equality of Women and Men in Bulgaria (2025). Available online at: https://www.strategy.bg/publicconsultations/View.aspx?lang=bg-BG&Id=9300 (September 2025).

19 Ibidem

20 Ivanova, V. and St. Taneva (2024). Labour and Social Justice. Sexual Harassment in the Workplace. Friedrich Ebert Foundation - Bulgaria and CITUB. Available online at https://bulgaria.fes.de/fileadmin/user_upload/documents/publications/2024/Seksualen_tormoz_na_rabotnoto_mjasto_WEB_BG.pdf(September 2025).

Importance of Internal Policies and Training

It is important to emphasise that the mere existence of a workplace harassment policy is not sufficient. Recent research shows that organisations with formal policies do not report fewer cases of harassment (Blumell, 2025).[21] Mechanisms for follow-up action, clearly defined reporting channels and options for effective protection of those affected are often missing. Training increases the likelihood of action, but its reach is limited: only a small proportion of participants in the study (around 16.4%) had been informed about or trained on existing policies. In companies that have undergone training, the organisation is significantly more likely to respond appropriately when an incident occurs. Cultural barriers to reporting remain a serious challenge, and regardless of the existence of a policy many victims do not report incidents due to lack of trust, fear of retaliation or concerns about negative career consequences.

At the same time, the economic consequences, especially of workplace harassment, are considerable. Employers suffer significant losses, including reduced productivity, staff turnover, absenteeism, lower engagement and additional legal costs.[22] A meta-analysis shows losses exceeding 22,500 dollars per employee who has experienced harassment.[23]

The conclusion is that training and policies can be highly beneficial, but on their own they are not enough. In-depth analyses conducted by Harvard University[24] confirm that policies alone (or training alone) do not eradicate the problem. They must be supported by real action, accountability and changes in corporate culture, both overall and within individual companies. Formal policies and training are important but insufficient elements of prevention. The most effective approaches combine clear reporting procedures, training, protected channels and accountability.[25] Cultural change is key to success, creating an environment in which

21 Blumell, L. and Mulupi, D. (2024). Addressing Workplace Sexual Harassment Through Organizational Policy Messaging, Journal of Communication Studies. Available online at: https://doi.org/10.1080/10510974.2024.2406045 (September 2025).

22 Hoel, H., Einarsen, S., and Cooper, C. L. (2003). Organisational Effects of Bullying. In S. Einarsen, H. Hoel, D. Zapf, & C. L. Cooper (Eds.), Bullying and Emotional Abuse in the Workplace. International perspectives in research and practice (pp. 145-161). London, New York: Taylor & Francis Inc. (September 2025).

23 Shaw, E., Hegewisch, A., and Hess, C. (2018). Sexual Harassment and Assault at Work: Understanding the Costs, Institute for Women's Policy Research. Available online at: https://iwpr.org/wp-content/uploads/2020/09/IWPR-sexual-harassment-brief_FINAL.pdf (September 2025).

24 Dobbin, F. and Kalev, A. (2019). How workplace harassment programs fail – and what can be done about them, Harvard Gazette, 18.06.2019. Available online at: https://news.harvard.edu/gazette/story/2019/06/sociologists-examine-why-so-many-harassment-programs-fail-and-what-can-be-done-about-them/ (September 2025).

25 Willness, C., Steel, P. and Lee, K. (2007). A Meta-Analysis of the Antecedents and Consequences of Workplace Sexual Harassment, Personnel Psychology, 60(1), pp. 127-162. https://doi.org/10.1111/j.1744-6570.2007.00067.x (September 2025).

reporting does not lead to sanctions but to justice.[26]

Despite the lack of data for Bulgaria, there is international research demonstrating the positive impact of internal company policies, training and grievance mechanisms.[27] The International Labour Organization (ILO) highlights that training for employees at all levels increases awareness and reduces unacceptable behaviour, while internal grievance mechanisms increase the likelihood that victims will report harassment.[28] Numerous sources show that companies with a clear code of conduct against discrimination and workplace harassment, combined with regular training, report lower turnover, higher levels of employee trust and a better organisational climate.[29]

According to the recommendations of the World Benchmarking Alliance (whose methodology is applied in this report), most good practices are linked to clearly formulated and publicly accessible anti-harassment policies, gender-sensitive training and the presence of an independent and easily accessible grievance mechanism. In Bulgaria, there is no systematic monitoring of the effectiveness of internal policies and training in the private sector, which represents a valuable opportunity for future research and for cooperation with companies interested in improving their internal environment. Internationally, there is unequivocal evidence that these tools are effective, which makes their adaptation and implementation at local and national level even more urgent.

26 Dobbin, F. and Kalev, A. (2020). Why Doesn't Diversity Training Work? The Challenge for Industry and Academia, Anthropology Now, 12(1), pp. 48-55. Available online at: https://scholar.harvard.edu/files/dobbin/files/an2018.pdf (September 2025).

27 McDonald, P., Charlesworth, S. and Graham, T. (2015). Developing a framework of effective prevention and response strategies in workplace sexual harassment, Asia Pacific Journal of Human Resources, 53(1), pp. 41-58. https://doi.org/10.1111/1744-7941.12046 (September 2025).

28 International Labour Organization (ILO) (2019). Convention No. 190 and Recommendation No. 206 at a glance. Available online at: https://www.ilo.org/global/topics/violence-harassment/lang–en/index.htm (September 2025 r.).

29 See McKay, P.F., Avery, D.R., Tonidandel, S., Morris, M.A., Hernandez, M. and Hebl, M.R. (2011). Racial Differences in Employee Retention: Are Diversity Climate Perceptions the Key? Personnel Psychology, 64(1), pp. 35-62. DOI:10.1111/j.1744-6570.2007.00064.x (September 2025); Gonzalez, J.A. and DeNisi, A.S. (2007). Cross-level Effects of Demography and Diversity Climate on Organizational Attachment and Firm Effectiveness, Journal of Organizational Behaviour, 30(1), pp. 21-40. https://doi.org/10.1002/job.498 (September 2025).

3. Project "*The Office as a Space for Strength and Empowerment*"

Methodology

The analysis has been carried out within the framework of the project "*The Office as a Space for Strength and Empowerment*", implemented by the Bulgarian Foundation for Business and Human Rights (BFBHR) under the *FORCE Program* of the Bulgarian Fund for Women (BFW), which is co-financed by the European Union (EU). The study aims to analyse publicly available information on the commitment, policies and actions of businesses in Bulgaria in the areas of gender equality, diversity and the prevention of gender-based violence and workplace harassment.

The analysis is based on the work of the World Benchmarking Alliance, which since 2018 has assessed the performance of 2 000 of the world's most influential companies, holding them accountable for their contribution to achieving the Sustainable Development Goals (SDGs). This is done through the development of thematic benchmarks that are free and publicly accessible. They enable companies to compare their results and progress across seven core systems: decarbonisation and energy, food and agriculture, nature, digital, urban, financial and social systems. By analysing where they stand in relation to each of these systems, companies can better position themselves, track their progress and remain accountable to different stakeholders.

One of these systems is social transformation, which includes the issue of gender equality. The World Benchmarking Alliance's Gender Benchmark is an international methodology designed to assess and compare corporate performance on gender equality as part of the broader framework of human rights and sustainable development commitments. The tool is based on the *UN Guiding Principles on Business and Human Rights* viewed through a gender lens and measures how companies:

- declare their commitment to gender equality;
- institutionalise policies and processes;
- respect human rights;
- take concrete action to improve gender equality;
- provide access to accountability and grievance mechanisms;

- ensure transparency of results

The World Benchmarking Alliance conducts two parallel analyses based on the "Gender Benchmark" methodology. The first, entitled *Gender Equality Assessment*, covers 2 000 of the most influential companies, applying part of the overall benchmarking methodology and tracking how companies are positioned in relation to gender equality.[30] This analysis has a broader scope and focuses on the role of companies in their social transformation with regard to gender equality. The Gender Benchmark, in turn, provides a more in-depth assessment of companies' performance, drawing on an expanded set of indicators. In 2023, a deep-dive analysis was carried out on 30 indicators across 112 companies in two sectors – *Textiles* and *Food and Agriculture* – identified as sectors with significant (both positive and negative) impact on progress towards gender equality.

The methodology of the study incorporates part of this deeper assessment but examines two main groups of indicators and their sub-indicators, structured into thematic clusters (strategy, human rights, supply chain, stakeholders, grievance mechanisms, violence, etc.). Each indicator is assessed on a three-point scale: fulfilled, partially fulfilled or not fulfilled. The absence of information is also recorded, which in the context of the Gender Benchmark is equivalent to non-fulfilment, as transparency is a critical dimension of business commitment and accountability on these issues.

The study covers 20 companies operating in Bulgaria. Among them are companies that have signed the *Diversity Charter*, companies that have signed the *Women's Empowerment Principles*, the top 100 employers for 2024 according to the Career Show ranking, or companies that demonstrate commitment to workplace gender equality and the prevention of gender-based violence. The selection follows the principle of the World Benchmarking Alliance: not to duplicate companies already included in the Corporate Human Rights Benchmark (CHRB) or the Gender Benchmark. Nevertheless, some companies included may have been part of other Alliance assessments (for example, on social standards), but without direct evaluation on gender equality.

The focus is on publicly available information about company practices at the local level – in Bulgaria – rather than on already published international results. The assessment is carried out by a team of trained experts who have completed specialised training in applying the Gender Benchmark methodology. The team analyses exclusively publicly accessible information

30 Gender Benchmark Methodology. Available online at: https://assets.worldbenchmarkingalliance.org/app/uploads/2024/05/2023-Gender-Benchmark-Methodology-3-May-2024.pdf (September 2025).

– corporate websites, reports, policies, codes of conduct, statements, media publications and other online sources. It is important to note that the analysis considers only officially published information available without a password, registration or internal access. No internal or confidential information is used.

Tools and Standards for Gender Equality in Business – Importance and Benefits

General References

The chosen methodology aligns with the *UN Sustainable Development Goals*, and in particular with Goal 5 Achieve gender equality, as well as with other international principles and normative standards (such as the *UN Guiding Principles on Business and Human Rights* and ILO conventions), and with key initiatives in the field of gender equality (for example the *UN Women's Empowerment Principles*).

The methodology developed by the World Benchmarking Alliance for assessing progress on gender equality is based on more than four years of research and collaboration with a wide range of experts and stakeholders, including organisations that set standards and conduct similar assessments. Its design seeks deliberate alignment with already established international standards, frameworks and indicators in the field of gender equality and women's empowerment, such as the *UN Guiding Principles on Business and Human Rights* viewed through a gender lens, the *WEPs Gender Gap Analysis Tool*, the *UN Women's Empowerment Principles (WEPs)* and the *Global Reporting Initiative (GRI)*.

In addition, the methodology continues to evolve and expand by incorporating other international standards, including:

- the UNDP Gender Equality Seal (GES);
- the Equileap Global Gender Equality Report and Ranking (Equileap);
- the Bloomberg Gender Equality Index (Bloomberg GEI).

These frameworks provide a structured assessment methodology, clearly defined indicators, mechanisms for self-assessment, external validation and certification. They are not merely "certificates" but strategic tools that: help companies identify weaknesses and risks; offer a roadmap for improvement; strengthen trust among employees, partners and investors; and

prepare companies for new regulations related to mandatory due diligence and sustainable reporting on environmental, social and governance aspects of corporate activity.

European Union regulations

In 2019, the European Union set the strategic objective of transforming Europe into the first climate-neutral continent as part of the European Green Deal. To support this process, several key regulations were adopted, including: the *Corporate Sustainability Reporting Directive* (CSRD – 12.2022)[31]*, the European Sustainability Reporting Standards (ESRS – 07.2023)*[32] and the Corporate Sustainability Due Diligence Directive (CSDDD – 05.2024)[33]. Their adoption places companies before a range of challenges aimed at improving the management and reporting of data related to environmental, social and governance aspects of their activities.

The *Corporate Sustainability Reporting Directive (CSRD)* is a key instrument in this process, as it aims to harmonise standards, increase transparency and achieve better comparability of data. Companies must report not only on their own impact on the climate and the environment, but also on the social dimensions of their activities – including gender equality, equal pay and non-discrimination. While the *Reporting Directive* sets clear standards for corporate disclosure, the Sustainability Reporting Standards assess the quality of the information provided through audits. The *Corporate Sustainability Due Diligence Directive (CSDDD)*, in turn, creates an obligation for companies to identify, prevent, mitigate and account for risks to human rights and the environment within their supply chains. It introduces a risk-based approach, requiring companies to carry out regular impact assessments, implement preventive and corrective measures, and ensure grievance mechanisms and access to effective remedy for affected individuals. In this way, the *Due Diligence Directive (CSDDD)* builds on the *Reporting Directive (CSRD)*, which focuses primarily on reporting and transparency, while the *Due Diligence Directive* creates an obligation for companies to take concrete action in managing risk across their entire value chain.

With regard to gender equality, the *Corporate Sustainability Reporting Directive* provides a baseline and reporting framework whose measurable and mandatory element is corporate sustainability. Here the key questions include: the ratio of employed men and women at different levels of the company; equal pay in line with the *Pay Transparency Directive (Directive (EU) 2023/970)*[34]; company policies for addressing discrimination; recruitment practices; diversity and inclusion policies; and policies on human and labour rights. Companies present not only data and information but also the progress achieved. In addition, they provide an improvement plan for the reported data with measurable indicators.

The social standards in the *European Sustainability Reporting Standards (ESRS)* include detailed requirements that companies may follow in their reporting, among which are: the gender pay gap; diversity in governing bodies and management; maternity/paternity leave policies; representation of women in the workforce and leadership; equal opportunity and non-discrimination policies; measures against sexual harassment and workplace violence; employee well-being and social dialogue.

The *Due Diligence Directive is based on the UN Guiding Principles on Business and Human* Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. It emphasises that, when assessing actual and potential adverse impacts, companies must take into account the different vulnerabilities and marginalisation of affected groups. They must also consider the different risks that women and men may face, as women and girls are exposed to specific impacts and require effective protection tailored to their gender.

In Bulgaria, the *Corporate Sustainability Reporting Directive* has been transposed into national law through amendments to the Accounting Act[35], which has encouraged many companies to improve their non-financial reporting practices. This can already be observed in the sustainability reports of various companies. Investments in processes and teams have also begun in order to meet the regulatory requirements. However, the process has slowed down, as on 26 February 2025 the European Commission presented the Omnibus amendment package[36], which affects both the *Corporate Sustainability Due Diligence Directive (CSDDD)* and the *Corporate Sustainability Reporting Directive (CSRD)*. The Bulgarian government voted to postpone

31 Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU as regards corporate sustainability reporting. OJ L 322, 16.12.2022, pp. 15–80. Available online in Bulgarian at https://eur-lex.europa.eu/legal-content/BG/TXT/?uri=CELEX:32022L2464 (September 2025).

32 European sustainability reporting standards (ESRS Set 1) Available online in English at https://xbrl.efrag.org/e-esrs/esrs-set1-2023.html (September 2025).

33 Directive (EU) 2024/1760 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859. OJ L, 2024/1760, 5.7.2024. Available online at https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024L1760&qid=1759843075997 (September 2025).

34 Directive (EU) 2023/970 of the European Parliament and of the Council of 10 May 2023 on strengthening the application of the principle of equal pay for equal work or work of equal value between men and women through pay transparency and enforcement mechanisms. OJ L 132, 17.5.2023, pp. 21–44. Available online in Bulgarian at https://eur-lex.europa.eu/legal-content/BG/TXT/PDF/?uri=CELEX:32023L0970&qid=1759843657199 (September 2025).

35 Law amending and supplementing the Accountancy Act (2016). Available online at: https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=225780

36 European Commission. Omnibus package. 26.02.2025. Available at: https://finance.ec.europa.eu/news/omnibus-package-2025-04-01_en (September 2025).

the application of the Act by one year to ensure that the requirements align with EU standards and to give companies more time to prepare their reports. The Due Diligence Directive is yet to be transposed into national law.

A fundamental point for the study (and for companies in Bulgaria more broadly) is the requirement that gender equality is no longer a matter of choice – companies will be obliged to report whether they comply with it and, if not, to justify why. The reports must be public and are already being reviewed and considered by investors, the media and civil society. The consequences for companies that fail to comply with the new transparency and accountability requirements may be legal, reputational or financial. Those that take action to advance gender equality, collect data and disclose information on the environmental, social and governance aspects of their work may gain a competitive advantage and attract stronger talent, financing or partnerships.

Limitations and Observations

The assessment process is complex and requires significant effort: careful review of extensive materials, comparison of Bulgarian and international documents, keyword-based searches for documentation, verification of links and dates. The following difficulties often arise:

- confusing or incomplete information, especially on localised (Bulgarian) websites;
- detailed information available in English but largely missing from Bulgarian websites;
- discrepancies between international and local practices;
- the presence of declarations without real action, often presented as progress;
- lack of concrete policies and mechanisms despite stated intentions;
- technical errors and inconsistencies in publications, which hinder analysts.

It can be argued that the field is still new to the Bulgarian market, and issues related to violence and harassment are significantly less represented compared to other environmental, social and governance commitments or initiatives linked to *diversity, inclusion and belonging*.

The main observations on the topic can be summarised as follows:

✓ **Limited publicity and lack of transparency**

Most of the companies examined in Bulgaria do not publish information about their internal policies, as confirmed by the study. They do not share detailed information about their policies or practices related to gender equality. The lack of transparency significantly hampers the assessment of progress and commitment to these issues. Although representatives of various companies in the country confirm the existence and application of internal policies, these are not publicly accessible. This does not align with the principles of accountability and openness embedded in the Gender Equality Benchmark and other sustainable reporting instruments.

✓ **Good practices – primarily in multinational companies**

Well-developed and clearly articulated policies and objectives are typically characteristic of multinational companies. However, discrepancies are often observed between international commitments and local actions – the practices described at the global level are not applied or communicated effectively in Bulgaria. In most cases they are not even translated into Bulgarian, which raises questions about their actual implementation.

✓ **Superficial approach to gender equality**

Gender equality is often conflated with other concepts such as diversity and inclusion (DEI), without distinguishing the specific needs, constraints and objectives related to gender. As a result, the issue of women as a vulnerable or underrepresented group in leadership and in certain sectors becomes diluted and marginalised.

✓ **Insufficient management engagement**

In most companies there are no defined tasks, policies or responsible persons at senior management level dedicated to gender equality. Even when some companies demonstrate an intention to increase the number of women in leadership, clear quantitative targets, timelines or specifically assigned responsibilities are usually absent.

✓ **Workplace harassment – an absent topic**

Despite the growing international focus on gender-based violence and workplace harassment, in Bulgaria these topics are almost entirely absent from companies' public information. In

none of the publicly available documents is harassment identified as a risk factor for human rights or employee well-being. This contrasts with the recommendations of the International Labour Organization (ILO), the *UN Guiding Principles on Business and Human Rights* and global good practices.

✓ **Limited understanding of human rights**

In a corporate context, the notion of "respect for human rights" is often associated primarily with employee care (e.g. occupational health and safety, flexible working hours, social benefits). However, the emphasis should be on corporate responsibility for the potential negative impact of business activities on the rights of different groups, including women and girls, particularly within supply chains.

✓ **Use of the word gender**

International documents use the term *gender*, which focuses on assessing the situation of women and girls, men and boys, as well as LGBTI people. "Gender" is an analytical category that, unlike biological sex, examines the social dimensions of sex and sexuality (gender identity, sexual behaviour, sexual and romantic orientation), as well as power relations in society. For the purposes of this study, we apply the term *gender* in the sense of biological sex, in line with the guidance of the WBA methodology used. At the same time, it is important to note that for the assessment to be complete, it should be gender-responsive, meaning that it should encompass women, men and LGBTI people.

✓ **Lack of self-assessment and structured gender equality audits**

Overall, companies do not conduct regular self-assessments or independent audits dedicated to gender equality. There is often a lack of understanding as to why such an assessment is necessary, even though most companies are already subject to various internal and external audits on other topics (e.g. financial audits, ISO standards, climate targets). Integrating gender equality into these processes could become a natural and entirely logical next step.

✓ **Sustainable development reports**

Many companies publish only limited information on various indicators and areas of activity in their annual sustainability reports. The gender-related data disclosed typically concern the number of employees by gender and the ratio of men to women at management level. However, it is difficult to determine whether this information serves as a basis for strategic planning or for setting concrete objectives – for example, what measures the company intends to take to promote diversity in leadership teams and what timelines have been established.

✓ **Supply chain – climate targets but not social ones**

It is evident that the focus is placed on sustainable supply chain management primarily from an environmental perspective – for example, reducing the carbon footprint (CO_2). There is also growing interest in strengthening engagement with supply chains, supported by various codes of conduct and supplier selection processes. Nevertheless, it remains unclear how suppliers and their employees are protected and what the most significant risks are. The prevailing perception is that suppliers face numerous requirements without any clarity as to whether they receive meaningful support. This is particularly important in industries with seasonal labour or in the lower tiers of supply chains, where women represent a larger share of the workforce. At the same time, women and minority groups often have limited access to the opportunities offered by supply chains. Gender equality in suppliers' working conditions is almost entirely absent. Only a few companies set targets for supply chain diversification, encouraging engagement with diverse suppliers and supporting them in developing their entrepreneurial skills.

✓ **Lack of dedicated roles responsible for supporting gender equality**

In most cases, gender-related issues are embedded within the activities of the Human Resources department. However, there are no clearly defined roles or allocated responsibilities. This results in the absence of strategic planning, weak internal advocacy and limited accountability.

✓ **Grievance channels**

The availability of multiple channels for submitting complaints (including anonymously) shows that most companies are willing to receive feedback and engage with different stakeholders. However, merging grievance mechanisms with whistleblowing systems into a single channel is not good practice and may lead to confusion or undermine trust in the effectiveness of these mechanisms.

4. Observations and Trends by Clusters of Indicators

The analysis of publicly available information makes it possible to identify key trends, gaps and good practices in corporate policies and actions related to gender equality.

The study examines two main groups – 'Governance and strategy' and 'Gender-based violence and workplace harassment', organised into the following seven clusters:

- Governance and targets
- Human rights
- Supply chain
- Stakeholders and internal communication
- Grievance mechanisms
- Harassment and a safe working environment
- Training, measurement and internal processes.

For each cluster, the main observations are presented, accompanied by examples and recommendations where appropriate. It is important to note that the analysis does not provide a complete picture of all company activities. Rather, it reflects their communication and public commitment to gender equality – a factor that is a key element of corporate responsibility and environmental, social and governance reporting.

4.1. Strategies and Commitments

One of the key indicators is the existence of a public commitment to gender equality, accompanied by a strategy with measurable objectives and targets. A public strategic commitment does not amount merely to declarative support. It involves formulating clear policies, time-bound goals, designated responsible individuals and mechanisms for implementation and monitoring.

Within the scope of the study, most companies do not have a stand-alone gender equality strategy. Where commitments are stated, they form part of broader sustainability or diversity themes presented in sustainability reports. Three of the companies examined have clearly defined gender equality strategies and have also signed the relevant international *UN Women Empowerment Principles (WEP)* in this field.[37] One of the companies, although a signatory to the *WEP*, does not present clearly formulated objectives. This highlights the need for commitments related to gender equality to have measurable and meaningful parameters rather than remaining purely declarative.

It is important to note that the frequently cited *Diversity Charter*, while representing an important signal of engagement with diversity and inclusion, does not meet the methodology's criteria for a strategic commitment, as it does not include specific objectives, timelines or accountability mechanisms.

Clearly defined, timebound targets are a critical element of a strategic commitment. They enable the measurement of progress, accountability to internal and external stakeholders, and the allocation of resources and attention to specific areas of concern. Although several companies have declared gender-related objectives, few of them include a time horizon or a clearly defined implementation plan.

Examples of good practices

Strategy:

- Company 1 clearly states its commitment to human rights and decent working conditions, including within its global supply chain. It develops and implements a programme against modern slavery aimed at identifying and preventing human rights violations. Its approach includes engagement with affected groups and supplier monitoring systems.
- Company 2 identifies risks in its supply chains from a gender equality perspective and has developed a sustainable supply chain strategy that contains ethical standards
- and supplier requirements. It works with international frameworks for ethical and sustainable business, including principles for the protection of human rights and decent working conditions. It requires its suppliers to comply with its Code of Conduct, which

37 UN Women's Empowerment Principles. Available in Bulgarian at https://www.weps.org/sites/default/files/2020-04/FLYER%20WEPs%20web-20191107165656.pdf (September 2025).

includes commitments to gender equality and non-discrimination.

- Company 3 has embedded the principles of gender equality and women's empowerment into its ESG strategy through work on equity, diversity and inclusion. Its policies apply to all employees, contractors, suppliers and partners, and it also has a diversification policy. At present, 36% of its board members are women (4 out of 11).

- Company 13 has a gender equality strategy as part of its human resources management policy, which clearly shows the distribution of employees by sex across different business areas. However, there is no specific information on the existence of targeted commitments or measurable objectives to promote gender equality and women's empowerment in the workplace.

Objectives:

- Company 4 has a clearly defined, timebound objective. The average income of men and women in the company is practically equal, with no direct or indirect discrimination. The gender pay gap is –0.2% for women when the salaries of senior management are excluded. This is the only publicly available example of a company in Bulgaria that provides such specific quantitative information.

- Another company also reports a gender pay gap, although it does not specify what measures are being taken in response.

- Two other companies present clearly formulated objectives to increase the participation of women to 40% in certain units and managerial roles, but the absence of timelines and an implementation plan limits full alignment with the indicator.

- Company 13 discloses the representation of women in senior management and an increase in the proportion of women on the board, but it does not set out specific timebound targets for achieving gender equality at board level.

Cluster summery

Only a handful of companies in Bulgaria have a developed strategy with concrete objectives and accountability, and where such objectives are formulated, they often lack a time horizon and clarity on implementation. Principles of gender equality are most commonly added to sustainability reports or to various diversity and inclusion initiatives, rather than being embedded in stand-alone strategies or in the overall human rights policy. Equal pay and women's participation on governing boards are achieved in very few companies, even though these are among the most significant indicators of equality.

The *Diversity Charter*[38] encourages companies to introduce diversity and inclusion policies, and it is therefore unsurprising that companies that have joined it often participate in various inclusion-related initiatives. Not all companies, however, have such policies. Participation in the Charter can serve as a potential foundation for further development in this direction. Joining the *UN Women's Empowerment Principles* is also a positive signal of commitment, but it cannot replace a genuine strategy with clearly defined objectives, commitments and mechanisms.

These results are not surprising and are confirmed in a report[39], published in 2024 prepared by leading Bulgarian companies in partnership with the Centre for the Study of Democracy. It presents the first national study of corporate policies and practices in the Bulgarian private sector related to diversity, equality and inclusion (DEI). The analysis of 238 companies shows that, despite growing interest in the topic, only a small proportion have clearly formulated DEI strategies, training programmes or mechanisms for tracking progress. Larger organisations and signatories to the *Bulgarian Diversity Charter* demonstrate higher levels of engagement and a more integrated approach, while smaller enterprises and those outside major cities show lower awareness and a limited understanding of the benefits of applying DEI measures within organisational culture. This is why support for policies and practices aimed at gender equality, which is one of the objectives

38 DIVERSE.BG. Diversity Charter in Bulgaria. Available online at https://diverse-bg.eu/wp-content/uploads/2023/08/Bulgarian-Diversity-Charter.pdf (September 2025).

39 Diversity, equality and inclusion on the private sector in Bulgaria https://diverse-bg.eu/wp-content/uploads/2024/09/Доклад_Многообразие-равнопоставеност-приобщаване-в-България-1.pdf (September 2025).

of this project, is an important step towards encouraging companies in Bulgaria to position themselves as active participants in upholding human rights, while at the same time improving the working environment and contributing to efforts to combat discrimination, workplace harassment and gender-based violence.

4.2. Human Rights

The cluster of indicators examines the extent to which companies recognise gender equality as a fundamental human right and how commitments to human rights are integrated into their policies, procedures and management practices. The focus is on whether companies:

- have publicly stated commitments on non-discrimination and gender equality;
- conduct human rights risk assessments from a gender perspective;
- carry out a due diligence process;
- apply effective gender-responsive remediation measures;
- undertake regular monitoring and prevention of violations.

Although the topic of human rights is mentioned in several companies' public documents, their commitments are often merely declarative and are not accompanied by concrete actions, procedures or accountability, particularly with regard to gender equality. Non-discrimination appears mainly as a principle in codes of ethics or supplier codes but is rarely linked to an actual policy or a targeted framework. There is no information on the conduct of gender-responsive due diligence or risk assessment. As a result, very few companies engage with stakeholders, which is an essential element of such assessments. Companies increasingly identify risks such as child labour, forced labour and modern slavery, but it is unclear how these risks are determined and whether they are subject to specific actions. Policies related to neurodiversity or other aspects of diversity are sometimes found, but gender equality remains outside their scope. Overall, there is a lack of systematic understanding of how gender equality fits within the broader human rights framework.

Good practices

- Company 1 and Company 2 state that they conduct gender-focused risk assessments within their supply chains.
- Others operate in countries with legislation that creates due diligence obligations for companies, such as Germany's Supply Chain Due Diligence Act (LkSG) and France's Duty of Vigilance Law. It is not clear, however, whether these obligations also apply to their local branches.
- There are isolated examples of publicly stated human rights commitments as part of ESG strategies, found mainly in multinational structures. At the same time, human rights topics are often included in companies' codes of ethics, but since no sanctions are foreseen for non-compliance, these commitments remain largely declarative.
- Company 8 bases its approach on the comprehensive global due diligence processes introduced in the 2023 financial year, which include both local and global risk assessments. With regard to its own operations, the company focuses on the following topics: prohibition of child labour; prohibition of forced labour and all forms of slavery; prevention of discrimination and intimidation; safeguarding freedom of association and the right to collective bargaining; and ensuring fair working conditions, including in relation to remuneration and working hours. These topics are also applied to suppliers, where the issue of grievance mechanisms is likewise included.

The risk assessment plays an exceptionally important role here. Within the Gender Benchmark, a gender-responsive risk assessment includes an analysis of potential risks such as discrimination, violence, inequality, child labour and forced labour, and requires the examination of supply chains for potential violations of the rights of women and vulnerable groups. The category also covers the identification of specific measures for prevention and control. It is essential to link the assessment to indicators, targets and public reporting. Conducting this type of assessment is not only good practice. Its alignment with the new EU regulations (already described) is becoming increasingly necessary. Gender equality should

not be viewed in isolation; it is an embedded dimension of corporate responsibility and respect for human rights. Companies that carry out gender-responsive due diligence will not only improve risk management but also strengthen trust among investors, employees and partners. A gender-responsive risk assessment is not merely an administrative task but an important tool for building a sustainable, ethical and attractive working environment.

Cluster summary

Companies in Bulgaria rarely integrate gender equality into the human rights framework, particularly at the public level. Non-discrimination is most often mentioned as a principle, but mechanisms for assessment, monitoring and reporting are lacking. A gender-responsive risk assessment, although required under the new reporting standards and mandatory due diligence rules, is not applied systematically, with only a few exceptions. This represents a major gap but also a significant opportunity for improvement, especially in view of the forthcoming EU regulatory requirements and the need for sustainable and responsible corporate practice.

4.3. Supply Chain

The cluster examines whether companies integrate the principles of gender equality into the management of their supply chains. The focus is on whether they conduct gender-responsive risk assessments; whether policies and standards are in place that bind suppliers to gender equality requirements; whether companies support local suppliers, small and medium-sized enterprises and women in vulnerable sectors; and whether they use mechanisms for monitoring, grievances and corrective action. Gender equality in supply chains is particularly important for ensuring sustainable and ethical business practices, as a significant share of social and economic inequalities can arise precisely at the lower tiers of supply chains, in production and resource extraction. Women often occupy low-paid, insecure or informal positions, and gender-related risks remain unnoticed unless they are deliberately identified and analysed. In the Bulgarian context, the topic of gender equality in supply chains remains weakly represented. The main reason is the lack of awareness and mature understanding of the issue; the concept of a 'supply chain' is often perceived as distant from a company's sphere of influence. There is insufficient understanding of whether a company has the right and the capacity to set requirements for its suppliers, as well as to support them. This is inevitable, as mechanisms and policies linking gender equality to suppliers are generally absent, and gender-responsive risk assessments are rarely conducted. Most companies in the study do not examine the policies and practices of their suppliers, including in relation to non-discrimination, diversity, women's participation in management or protected groups. Even when an ethical code or framework standard exists, procedures for implementation, monitoring and sanctions for non-compliance are lacking.

Good practices

- Company 2 applies a more mature approach to supply chain management, which includes requirements for grievance mechanisms, monitoring and supplier engagement. Other companies provide gender-responsive corrective actions when violations by suppliers are identified.
- Companies 5 and 9 use EcoVadis assessments, but there is no public information on whether social aspects, including gender equality, are covered or whether the results are analysed by sex.
- Some companies encourage supplier diversification by promoting the participation of small and medium-sized enterprises, as well as women-led businesses.
- Others seek to engage with local suppliers, which could serve as a basis for socially responsible and more accessible practices.
- Company 6 applies an interesting procedure that ensures engagement with suppliers on material topics, although gender equality is not among them.
- Companies 1, 2 and 10 require their suppliers to have grievance channels that are also accessible to external individuals.

Risk assessment in supply chains is a systematic process for identifying risks of human rights violations, including discrimination, inequality and exploitation. Good practice requires these

assessments to incorporate a gender perspective to identify specific risks for vulnerable groups and to enable the corresponding measures to be taken. Another important concept, which appears to be poorly understood in Bulgaria, is supply chain diversification: the deliberate inclusion of suppliers of different sizes, geographical locations or from vulnerable groups, including women entrepreneurs or small and medium-sized enterprises. This contributes to economic empowerment and social sustainability. Not least, there seems to be a lack of clarity about what grievance channels and corrective actions are and why they are necessary. These are mechanisms through which employees or affected individuals within the supply chain can report violations. As a result, companies take the necessary actions, including terminating contracts where required or providing remediation.

Cluster summary

Supply chains remain one of the areas in Bulgaria where corporate policies find it most difficult to integrate gender equality practices. Companies often lack clarity about what 'working with suppliers' entails, what their rights and responsibilities towards suppliers are, and whether influence is possible rather than merely imposing requirements. Targeted gender-responsive risk assessments and accountability mechanisms are absent. Nevertheless, good practices can also be observed: diversification, willingness to work with local suppliers, supplier engagement and transparency, and options for submitting grievances. These can be further developed in the coming years through the inclusion of a gender equality perspective and systematic support directed at suppliers.

4.4. Stakeholders and Internal Communication

The cluster assesses whether and how companies engage with stakeholders, including employees, trade unions, suppliers, customers, communities and NGOs, within their gender equality policies and practices. It examines the following questions:

- Is there an analysis and prioritisation of stakeholders?
- Does the company consult women or women's groups as part of the process of identifying human rights risks and conducting risk assessments?
- Are there consultations with vulnerable and affected groups, including from a gender perspective?
- What internal communication channels exist, particularly on issues related to equality?
- Are there mechanisms for feedback, participation and collaboration in policy development?

Stakeholder engagement is a core principle of sustainable development and human rights, especially when it comes to opportunities for participation, informed consent and collective bottom-up pressure for change. Companies in Bulgaria increasingly involve external stakeholders through corporate social responsibility (CSR) initiatives but rarely activate systematic consultation processes. Consultation is particularly limited on issues related to gender equality and internal employee policies. Stakeholder engagement is often linked to CSR and implemented through support for local causes. In most cases, companies conduct employee surveys to assess the organisation and career development opportunities, but there is no information on gender equality topics. There is also no evidence of consultations with trade unions or vulnerable groups, either in policy development or in gender-responsive impact assessment processes. Structured feedback on gender equality issues is often absent, even though mechanisms for general employee satisfaction exist. Civil society organisations are increasingly finding their place as partners in initiatives, but their role remains limited to supporting causes, whereas their expertise and work with beneficiaries could significantly enhance opportunities for social impact.

Good practices

- An increasing number of companies (for example Company 1) promote entrepreneurship, both among young people and through programmes focused on supporting women's participation in business.
- Company 3 implements projects to combat violence in partnership with civil society organisations, such as participation in various initiatives or prevention programmes.

- Two of the companies (Company 2 and Company 12) take part in initiatives such as ‘Child-Friendly Company’, demonstrating their commitment to supporting children and families.

- Some companies (Companies 1 and 5) work on programmes for decent work and the fight against modern slavery, with potential for engagement with vulnerable groups, although it is not clear whether this also applies to Bulgaria.

- Employee-led resource groups – several companies have internal initiatives dedicated to topics such as parenting, inclusion, LGBTI, neurodiversity and others, but these are rarely focused on gender equality.

- A good example from international practice is engagement through a process of stakeholder analysis and prioritisation. This approach clearly identifies the groups on which influence should be exerted, as well as the groups that exert influence on the company. It includes individual interactions, engagement with representative bodies and relevant multi-stakeholder platforms to identify potentially significant issues and groups.

It is important to clarify that ‘stakeholders’ are all individuals, groups or organisations that influence or are influenced by a company’s activities. This includes employees, customers, suppliers, communities, investors, NGOs, trade unions and public authorities. Stakeholder analysis, and particularly stakeholder prioritisation, is a process through which key groups are identified and classified to understand which are most affected by business decisions and to what extent they can exert influence. The characteristics of internal communication and the principles of feedback also appear to be insufficiently understood. These include internal surveys, focus groups, forums, meetings and online platforms through which employees can express opinions, concerns or suggestions. When these mechanisms are anonymous, structured and targeted at vulnerable groups, they can be an effective tool for identifying and addressing systemic inequalities. Overall, however, such practices are not applied. The main challenge is the absence of consultations with vulnerable groups, meaning specific engagement with women, minorities, persons with disabilities, neurodivergent individuals and other groups exposed to a higher risk of discrimination or exclusion in the workplace. In this sense, the cluster is extremely important. It is valuable that some companies demonstrate experience in developing employee-led resource groups.

Cluster summary

Stakeholder engagement remains underdeveloped as a systematic process in most companies despite their activity in the social sphere. This often takes place through one-off or recurring CSR initiatives rather than through sustainable, inclusive and transparent mechanisms for dialogue and joint decision-making. Internal communication focused on gender equality or engagement with vulnerable groups is even less common. Nevertheless, there are positive examples that could serve as a foundation for building a solid culture of participation and accountability in the future.

4.5. Grievance and Rights Protection Mechanisms

The cluster examines the existence, accessibility and effectiveness of mechanisms for submitting grievances and protecting workers’ rights. This includes grievance channels that are anonymous, accessible and publicly described; whistleblower protection policies; and mechanisms for external stakeholders such as suppliers and communities. Moreover, companies must be able to demonstrate that they collect and analyse data from submitted grievances, including by sex, and that they have established specific mechanisms for cases of discrimination or harassment. These mechanisms are essential not only for upholding human rights but also for building trust, accountability and a culture of inclusion within companies.

Eighteen of the twenty companies surveyed state that they have grievance mechanisms. Most are anonymous and accessible to employees and external parties, with a single submission channel, usually in the form of an online form, email address or telephone line. Where anonymity is not guaranteed, there is a risk of deterring whistleblowers. In some cases, companies declare that no grievances have been submitted, including on human rights issues, but there is no information on whether employees are trained to recognise violations and use the mechanisms. There is a conflation between grievance mechanisms and whistleblowing mechanisms – everyday complaints are not distinguished from serious alerts about irregularities or rights violations. None of the companies collect or publish data on the number of grievances submitted by men and women, which limits the possibility of gender-sensitive analysis and

prevention of discrimination.

According to the study, there is no clear link between grievance mechanisms and cases of discrimination or harassment – no specific channels or procedures for addressing these issues are identified. There is also no information on trained staff responsible for handling workplace harassment complaints. There are examples of companies where the role of trusted persons is becoming more active, but it is unclear how such reports are handled, whether these individuals have received training and how the rights of affected employees are protected in practice. In addition, suppliers are not required to have their own grievance mechanisms. Only Company 8 requires its suppliers to comply with the company's rules and report irregularities, but there is no evidence of actual channels being in place. There is also no data on the effectiveness of grievance mechanisms – it is unclear how many reports have been submitted, what actions followed and whether any changes have been made to policies as a result.

Good practices

- Companies 2 and 7 provide publicly accessible and well-structured reporting systems, available to both employees and external stakeholders. They also maintain internal communication on ethical standards that encourages the use of such mechanisms.
- Another company demonstrates a relatively high degree of transparency and accessibility in its grievance channel, ensuring anonymity and offering the possibility of feedback. Principles for the protection of rights are also included.
- Company 1 collects data according to the nature of grievances or complaints. In 2023, a total of 1,291 grievances or complaints were received, 55% of which related to discrimination, sexual harassment or other forms of harassment.
- An important practice is maintaining grievance channels in the relevant local language and ensuring the anonymity of the complainant.

It should be emphasised that grievance mechanisms are ***systems*** through which workers, suppliers or communities can submit complaints regarding violated rights, poor working conditions, discrimination and similar issues. They should not be confused with whistleblowing mechanisms, which are channels for reporting serious irregularities, often anonymously, with a focus on protecting the whistleblower. It is important to note that a mechanism is effective when it is clear and accessible, when employees are aware of it and when it leads to concrete action, including resolving the issue raised in the grievance and improving the system.

Cluster summary

Although most companies declare the existence of grievance mechanisms, the need for transparency, sex-disaggregated analysis and specific mechanisms for cases of discrimination or harassment is truly significant. A relatively low level of awareness is observed – from uncertain anonymity to a complete lack of training and accountability. Only a few companies demonstrate a higher level of understanding and application of good practices. Progress in this cluster can be achieved through clear policies, the integration of a gender equality perspective and the development of a culture of trust.

4.6. Violence, Harassment and a Safe Working Environment

This cluster may represent the most serious topic, generating significant concern during the research process. It examines companies' commitment to ensuring a safe and inclusive working environment, including policies and practices related to:

- workplace harassment and violence;
- sexual and psychological harassment;
- support in cases of domestic violence;
- training on prevention and reporting;
- mechanisms for response and protection of survivors.

The topic is directly linked to gender equality, as women are more frequently affected by various forms of harassment and violence, both in the workplace and at home.[40] At the same time, the absence of specific policies in this area raises questions about companies' ability to guarantee the protection and equality of their employees. The policies listed above are rarely applied, and even initial steps by employers to address the issue are largely absent. Companies all too often state that cases of discrimination or harassment are '0', which indicates a lack of reporting mechanisms and signals a serious misunderstanding of the issue. Companies in which employees feel able to report unethical behaviour do receive actual complaints.

Very few companies in Bulgaria have a clearly defined policy against workplace harassment or violence. In most cases, reliance is placed on general references in codes of ethics or conduct policies, but no specific guidance or procedures for responding to harassment cases are identified. Not a single company demonstrates a commitment to supporting employees affected by domestic violence, whether through internal policies, access to resources or partnerships with NGOs. No training on the prevention of sexual or psychological harassment has been introduced, and there is no evidence of awareness-raising campaigns that would indicate active internal communication on the topic. Nevertheless, there are companies in Bulgaria that invest in training related to the prevention of gender-based violence as part of their employee care, but they are not included in the analysis (or no information was found).

Good practices (beyond Bulgaria)

- In Company 1, employees do not appear to experience fear or hesitation when reporting unethical behaviour in the workplace. At the same time, data are available on the proportion of submitted grievances related to discrimination. A sexual harassment policy has been introduced, as well as an active zero-tolerance policy on harassment, which defines the different forms of harassment and the roles and responsibilities of employees, managers and witnesses. This type of policy prohibits all forms of harassment or discriminatory behaviour directed at anyone by anyone, including behaviour by company employees towards other employees (for example partners or suppliers). The policy also covers behaviour exhibited by (or directed towards) suppliers, subcontractors, business partners or other individuals.

40 European Council, Council of the European Union. Combating violence and harassment in the workplace: the Council invites EU Member States to ratify the ILO Convention. Press release 257/24 of 25 March 2024. Available online at: https://www.consilium.europa.eu/bg/press/press-releases/2024/03/25/combatting-violence-and-harassment-in-the-workplace-council-invites-eu-countries-to-ratify-ilo-convention/ (September 2025).

Since no other good practices were identified at the local level within the scope of the study, inspiring international examples are presented here as potential models:

- Company X introduces mandatory online training for all employees on preventing and reporting sexual harassment as part of its commitment to zero tolerance for discrimination and harassment.

- Company Y publishes a clear policy against discrimination and sexual harassment, which includes protection of workers from racial, gender-based and other forms of discrimination, as well as the provision of training and feedback mechanisms.

- Provision of training on the prevention of domestic violence and its impact on the workplace

It is important to highlight the key gaps. First and foremost is the absence of workplace harassment policies – most companies in Bulgaria do not publish clear policies specifying what constitutes harassment, how it should be reported and what happens afterwards. The same applies to domestic violence – there are no policies to support employees who have experienced domestic violence, such as additional leave, cooperation with specialised organisations or mechanisms for confidential assistance. Domestic violence is still perceived as a private issue between partners. Yet there is growing evidence that it constitutes gender-based violence, has significant societal impact and affects multiple spheres – the health and safety of the survivor and children; access to social and legal services; education; access to financial resources and employment relations[41]. According to the European Institute for Gender Equality (EIGE), gender-based violence costs the EU €366 billion per year, with 79% of this amount (€289 billion) relating to violence against women. Almost half of the costs (48%, or €174 billion) are due to intimate partner violence, 87% of which (€151 billion) again concern women. These costs fall into three main categories: lost economic productivity due to deteriorated employment status and reduced productivity of survivors; costs for public services – healthcare, justice, housing assistance and specialised services; and physical and emotional harm leading to a lasting reduction in quality of life. This is why the role of employers is becoming increasingly important, yet there is a lack of substantial information on training and prevention, meaning awareness-raising programmes that promote a culture of safety and respect within companies.

41 European Institute for Gender Equality. Costs of Gender-Based Violence in the European Union. Available online at: https://eige.europa.eu/gender-based-violence/costs-of-gender-based-violence (September 2025).

Cluster summary

In most companies in Bulgaria, the topic of gender-based violence, harassment and a safe working environment remains overlooked. The absence of specific policies and commitments raises questions about organisations' ability to ensure equality and a protected working environment, particularly for vulnerable groups. Good international practices show that reliable and feasible models exist that companies can introduce and implement, including training, clear procedures and support for those affected. It is time for the issue of safety to take its rightful place within the field of corporate sustainability.

4.7. Other Indicators

The cluster examines indicators related to organisational maturity on gender equality that do not fall within the other core areas but are essential for achieving meaningful change. It also includes information on how companies engage with their employees and how they are perceived in the public domain:

- Training on topics such as equality, inclusion, diversity and non-discrimination;
- Leadership participation and engagement in achieving the goals;
- Mechanisms for tracking, monitoring and evaluating progress;
- The existence of indicators, data and regular equality reports;
- Awards and recognition for achievements in employee care;
- Company assessments and employee satisfaction.

These are areas that often remain in the background but are fundamental to sustainable transformation. They show whether organisations are institutionalising their approach to equality or relying on one-off campaigns. Only a few companies offer training on diversity, inclusion and belonging – and in most cases there is no information on whether such training is mandatory, what it covers, how many people it reaches or how frequently it is delivered. There is almost no public information on mechanisms for monitoring and evaluating progress on gender equality, whether in internal processes or published reports. Clearly formulated success indicators or impact assessments are absent – this applies both to diversity policies and to broader goals related to sustainable development and human rights. In many cases, a lack of internal accountability is observed, meaning it is unclear who within the organisation is responsible for progress on gender equality.

Good practices

- Company 7 demonstrates a high level of commitment with a focus on neurodiversity – training and policies are provided that broaden the understanding of inclusion beyond traditional categories (sex, age, ethnicity). In essence, this is an indicator of maturity and a comprehensive approach to equality.
- The Academy for Diversity, Equality and Inclusion is being established, bringing together different companies and serving as an example of collaboration between an academic institution, business and a non-governmental organisation. The aim of the Academy is not only to build participants' capacity but also to serve as a platform for the exchange of good practices among companies.
- Company 4 applies global reporting standards (GRI) in its sustainability report and receives numerous distinctions, including various employer-of-the-year and ESG awards.
- Company 5 participates in programmes such as EcoVadis and the UN Global Compact's Gender Equality Programme.
- Company 11 uses the B4SI social framework as a tool for measuring the social impact of the community and the organisations it supports through various corporate responsibility initiatives.
- Company 9 is certified under the 'Great Place to Work' programme and conducts regular internal employee surveys.

Cluster summary

Although equality policies and initiatives are beginning to enter the corporate vocabulary in Bulgaria, the absence of training, monitoring and internal accountability remains one of the main challenges. Isolated cases demonstrate a higher level of institutionalisation, such as Company 7's practices on neurodiversity. Without clear training, leadership commitment and indicators of progress, there is a risk that any equality policy will remain merely declarative rather than goal-oriented and transformative.

4.8. Summary Observations: Examples of Strong and Weak Practices across Clusters

The study aims not only to determine the place of gender equality within the business landscape in Bulgaria but also to serve as a guide for strengthening existing practices. This section provides a summarising overview of the observed strengths and challenges in companies' performance across each of the clusters of indicators from the 'Gender Equality Benchmark' methodology. The selected examples – anonymised for confidentiality – illustrate both inspiring approaches that can be adapted by other organisations and common gaps that highlight the need for systematic progress. The table summarises both the good practices and the missing or underdeveloped elements in each thematic cluster. The overview should not be interpreted as a final assessment but as a snapshot of companies' maturity, intended to guide efforts towards a more targeted and in-depth integration of gender equality across all aspects of corporate policy and practice.

Cluster	Good practices	Weak practices
1. Strategies, commitments and goals	Companies with clearly stated commitments to gender equality – targets for women's participation, adherence to the UN Women's Empowerment Principles, local strategies, and a group-level gender equality strategy.	Formal endorsement of commitments without action; strategies available only in English with no real implementation; lack of specific time-bound and quantitative targets for measuring progress.
2. Human rights	Inclusion of topics such as child labour and modern slavery; compliance with international human rights standards; linkage to gender equality; conducting a due diligence process; gender-responsive risk assessment.	No local implementation; the topics are not considered significant; absence of gender-equality actions; human rights are often understood narrowly as labour rights; no risk assessment or due diligence process is carried out.
3. Supply chains	Encouragement of engagement with local suppliers and with small and medium sized enterprises led by women, risk assessment matrices, external assessments such as EcoVadis, supply chain mapping.	Lack of consideration of gender-related issues; lack of clarity regarding social audits; no requirements for suppliers to have grievance mechanisms.
4. Stakeholders and internal communication	Projects supporting women in business; decent-work programmes; corporate funds for NGOs; engagement with vulnerable groups as part of the due diligence process; regular employee surveys and communication.	Lack of consultation with trade unions or employees; weak focus on gender equality and feedback.
5. Grievance and rights protection mechanism	Anonymous and accessible mechanisms; clear distinction between complaints and whistleblowing; effective survivor-centred protection; an organisational culture that supports the reporting of unethical behaviour.	Lack of gender-disaggregated data, absence of training on the use of specialised discrimination mechanisms, zero reported cases or complaints.
6. Harassment, violence and safe working environment	Zero-tolerance policies on workplace harassment; effective survivor-centred protection measures; mandatory employee training; whistleblowing and unethical-behaviour reporting; a domestic-violence policy; leave for court attendance; a supportive environment and engagement with specialised organisations working on gender-based violence.	Lack of local anti-harassment policies; minimal commitment to protection from domestic violence; the employer's role remains poorly understood.
7. Training, leadership and monitoring	Diversity, inclusion and belonging programmes; neurodiversity training; roles with a social-impact focus; designated trusted persons.	Lack of publicly available data on progress; insufficient diversity and inclusion training, or training delivered only pro forma with no evidence of applied learning.

5. Conclusions and Recommendations

The analysis of companies' performance against the gender-equality indicators reveals substantial gaps and uneven implementation of policies and practices among the participants in the study. While some demonstrate commitment and partial good practice, the overall picture points to a systemic lack of maturity, limited integration, and a weak understanding of gender equality as a strategic business priority.

Key conclusions from the survey:

- **Low overall rate of indicator fulfilment:** most companies meet only basic requirements such as non-discrimination and equal opportunities, often merely at a declarative level.
- **Lack of internal capacity:** the indicators are not recognised as linked to business performance but rather as 'external requirements', which often results in formal compliance without real implementation.
- **Insufficient transparency:** publicly available information is limited and often does not allow verification of actual policy application.
- **Inadequate policy differentiation** in terms of specific issues such as gender-based violence, harassment, discrimination, and risks in supply chains.
- **Limited data on complaints or reports**, which does not indicate an absence of problems but often reflects a lack of trust and ineffective mechanisms.
- **Minimal participation** in international frameworks and initiatives that could support internal development and strengthen companies' positioning.

Despite the overall gaps, the analysis highlights several individual good practices that are encouraging and can serve as a model:

Category	Good practice (anonymised)
Equal pay	A company with a -0.2% difference in favour of women and a publicly stated commitment to equality
Proactive recruitment of women	Target of achieving 40% women's representation in recruitment for specific units
Dedicated human rights due-diligence processes	Ongoing due-diligence cycle focused on identifying risks with the greatest impact on people
Supply chain diversification	Encouraging engagement with local suppliers and women-led SMEs, supported by EcoVadis assessments
Neurodiversity training alongside broader diversity, inclusion and belonging programmes	Programme for recognising and integrating neurodiversity; collaboration between companies, non-governmental organisations and the academic community in educational programmes on diversity, inclusion and belonging
Complaints and internal reports	Well-structured channels that ensure anonymity, clear instructions and the possibility for feedback
Partnerships with NGOs	Financing programmes for women entrepreneurs; work on issues such as decent work and gender-based violence
Internal resources	Employee resource groups on various topics: LGBT+, parent-support groups, cultural and ethnic communities

The following recommendations are proposed, addressed to businesses and public institutions:

1. **Training and internal capacity:** conducting training for internal teams and managers on: application of the indicators; recognising discrimination and harassment; building a culture of accountability and transparency. As part of the project, practical modules, templates and interactive case studies will be offered.

2. **Increased transparency and public commitments:** publishing specific gender-equality targets; sharing public policies and annual reports; introducing gender-disaggregated data across all relevant aspects (pay, complaints, participation, etc.).

3. **Clear and effective reporting mechanisms:** distinguishing complaint channels by type: harassment, discrimination, whistleblowing; ensuring accessibility and anonymity; training employees on how and when to use the mechanisms.

4. **Integrating gender equality into ESG and sustainable development:** integrating equality into ESG strategies; accounting for gender-related risks, especially in supply chains; collecting and using data; reporting.

5. **International commitments and standards:** encouraging Bulgarian companies and corporations to join the UN Women's Empowerment Principles (WEPs) and other certification programmes, as well as complying with various EU directives related to equal pay and women's participation in leadership positions, and other key equality standards.

6. **Partnerships and mutual learning:** establishing partnerships with NGOs for support and consultation; organising round tables and practical workshops among different stakeholders; sharing real cases and examples through joint reports or annual meetings.

7. **Ratification of the International Labour Organization (ILO) Convention on violence and harassment in the world of work** as a key standard for addressing these issues: the adoption of the Convention is a good example of cooperation between the state and business. Through its ratification and implementation in Bulgarian legislation, the state could provide clear guidance and directions on how companies can address violence and harassment in the world of work more effectively.

In conclusion:

The report covers a small segment of the methodology and provides a partial analysis of the companies examined.

The key to change lies in new policies, but also in creating an organisational culture that recognises the importance of equality; encourages people to speak up; partners with them and learns from practice. And most importantly – it believes that equality is not only an external accountability requirement, but an internal necessity grounded in care for others. Let us take part in this process together!

List of sources:

1. World Benchmarking Alliance. Gender Benchmark Methodology. April 2023. Available online at: https://assets.worldbenchmarkingalliance.org/app/uploads/2024/05/2023-Gender-Benchmark-Methodology-3-May-2024.pdf
2. World Benchmarking Alliance. Gender Benchmark Methodology April 2023. Available online at: https://assets.worldbenchmarkingalliance.org/app/uploads/2024/05/2023-Gender-Benchmark-Methodology-3-May-2024.pdf
3. Banahan, C. and Hasson. G. (2018). Across the Board Improvements: Gender Diversity and ESG Performance. Harvard Law School Forum on Corporate Governance. Available online at: https://corpgov.law.harvard.edu/2018/09/06/across-the-board-improvements-gender-diversity-and-esg-performance/
4. Keisse, H.H. and Jaafar, A. (2025). The Impact of ESG Engagement and Gender Diversity on Corporate Investment Efficiency: Evidence from European Listed Firms, Journal of Financial Reporting and Accounting. https://doi.org/10.1108/JFRA-01-2025-0086
5. Ojeda, L., Ginieis, M. and Papaoikonomou, E. (2025). Gender Equality in Sustainability Reporting: A Systematic Literature Review, Corporate Social Responsibility and Environmental Management, Jan Issue. https://doi.org/10.1002/csr.3089
6. Miller, A., Grabski, T., Vegezzi, V. and Garrity, J. (2024). Gender Equality Metrics. Analysis of Stock Exchange Guidance. Available online at: https://sseinitiative.org/sites/sseinitiative/files/publications-files/gender-metrics-unsse-ifc.pdf
7. Global Parity Alliance (2023). Diversity, Equity and Inclusion Lighthouses 2023. Available online at: https://www.weforum.org/publications/global-parity-alliance-diversity-equity-and-inclusion-lighthouses-2023/
8. OECD (2017). Responsible Business Conduct for Institutional Investors: Key Considerations for Due Diligence under the OECD Guidelines for Multinational Enterprises. Available online at: https://www.oecd.org/en/publications/responsible-business-conduct-for-institutional-investors_8b9e240a-en.html
9. See Silk, D.M., Niles, S.V. and Lu, C.X.W. (2021). ESG and Sustainability: Key Considerations for 2021, Harvard Law School Forum on Corporate Governance. Available online at: https://corpgov.law.harvard.edu/2021/01/30/esg-and-sustainability-key-considerations-for-2021/
10. United Nations, Sustainable Development Goals https://sdgs.un.org/
11. UN (2017). United Nations Guiding Principles on Business and Human Rights. (Unofficial translation by the Bulgarian Business and Human Rights Foundation). Available online in Bulgarian at: https://bfbhr.org/wp-content/uploads/2024/07/bfbhr-oon-principi.pdf
12. Working Group on Business and Human Rights (2019). Gender lens to the UNGPs. Available online at: https://www.ohchr.org/en/documents/thematic-reports/ahrc4143-report-gender-lens-guiding-principles-business-and-human-rights
13. C190 – Violence and Harassment Convention, 2019 (No. 190). Available online at: https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190
14. See Harassment and Discrimination in the Workplace.Available online at: https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=67007
15. Despite the absence of mandatory requirements, many companies issue voluntary sustainability reports. Yet gender-specific information is seldom included. The most common disclosures relate to workforce data and the male–female distribution on boards of directors.
16. Opinion on the Ratification of ILO Convention No. 190/2019 on Eliminating Violence and Harassment in the World of Work https://esc.bg/wp-content/uploads/2025/02/esc_4_019_2022.pdf
17. MLSP (2023). Report on the Equality of Women and Men in Bulgaria. Available online at: https://www.mlsp.government.bg/uploads/41/test/za-ravnopostavenost-na-zhenite-i-mzhete-za-2023-g.pdf
18. Draft Report on the Equality of Women and Men in Bulgaria (2025). Available online at: https://www.strategy.bg/publicconsultations/View.aspx?lang=bg-BG&Id=9300
19. Ibidem
20. Ivanova, V. and St. Taneva (2024). Labour and Social Justice. Sexual Harassment in the Workplace. Friedrich Ebert Foundation – Bulgaria and CITUB. Available online at: https://bulgaria.fes.de/fileadmin/user_upload/documents/publications/2024/Seksualen_tormoz_na_rabotnoto_mjasto_WEB_BG.pdf
21. Blumell, L. and Mulupi, D. (2024). Addressing Workplace Sexual Harassment Through Organizational Policy Messaging, Journal of Communication Studies. Available online at: https://doi.org/10.1080/10510974.2024.2406045 (September 2025).
22. Hoel, H., Einarsen, S., and Cooper, C. L. (2003). Organisational Effects of Bullying. In S. Einarsen, H. Hoel, D. Zapf, & C. L. Cooper (Eds.), Bullying and Emotional Abuse in the Workplace. International perspectives in research and practice (pp. 145-161). London, New York: Taylor & Francis Inc.
23. Shaw, E., Hegewisch, A., and Hess, C. (2018). Sexual Harassment and Assault at Work: Understanding the Costs, Institute for Women's Policy Research. Available online at: https://iwpr.org/wp-content/uploads/2020/09/IWPR-sexual-harassment-brief_FINAL.pdf
24. Dobbin, F. and Kalev, A. (2019). How workplace harassment programs fail – and what can be done about them, Harvard Gazette, 18.06.2019. Available online at: https://news.harvard.edu/gazette/story/2019/06/sociologists-examine-why-so-many-harassment-programs-fail-and-what-can-be-done-about-them/
25. Wellness, C., Steel, P. and Lee, K. (2007). A Meta-Analysis of the Antecedents and Consequences of Workplace Sexual Harassment, Personnel Psychology, 60(1), pp. 127-162. https://doi.org/10.1111/j.1744-6570.2007.00067.x
26. Dobbin, F. and Kalev, A. (2020). Why Doesn't Diversity Training Work? The Challenge for Industry and Academia, Anthropology Now, 12(1), pp. 48-55. Available online at: https://scholar.harvard.edu/files/dobbin/files/an2018.pdf
27. McDonald, P., Charlesworth, S. and Graham, T. (2015). Developing a framework of effective prevention and response strategies in workplace sexual harassment, Asia Pacific Journal of Human Resources, 53(1), pp. 41-58. https://doi.org/10.1111/1744-7941.12046
28. International Labour Organization (ILO) (2019). Convention No. 190 and Recommendation No. 206 at a glance. Available online at: https://www.ilo.org/global/topics/violence-harassment/lang–en/index.htm (September 2025).
29. See McKay, P.F., Avery, D.R., Tonidandel, S., Morris, M.A., Hernandez, M. and Hebl, M.R. (2011). Racial Differences in Employee Retention: Are Diversity Climate Perceptions the Key?, Personnel Psychology, 64(1), pp. 35-62. DOI:10.1111/j.1744-6570.2007.00064.x (September 2025); Gonzalez, J.A. and DeNisi, A.S. (2007). Cross-level Effects of Demography and Diversity Climate on Organizational Attachment and Firm Effectiveness, Journal of Organizational Behavior, 30(1), pp. 21-40. https://doi.org/10.1002/job.498
30. Gender Benchmark Methodology.
31. Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU as regards corporate sustainability reporting. OJ L 322, 16.12.2022, pp. 15–80. Available online in Bulgarian: https://eur-lex.europa.eu/legal-content/BG/TXT/?uri=CELEX:32022L2464 (September 2025).
32. European sustainability reporting standards (ESRS Set 1) Available online in English at: https://xbrl.efrag.org/e-esrs/esrs-set1-2023.html
33. Directive (EU) 2024/1760 on corporate sustainability due diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859. OJ L, 2024/1760, 5.7.2024. Available online a: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024L1760&qid=1759843075997
34. Directive (EU) 2023/970 of the European Parliament and of the Council of 10 May 2023 on strengthening the application of the principle of equal pay for equal work or work of equal value between men and women through pay transparency and enforcement mechanisms. OJ L 132, 17.5.2023, pp. 21–44. Available online in Bulgarian at: https://eur-lex.europa.eu/legal-content/BG/TXT/PDF/?uri=CELEX:32023L0970&qid=1759843657199
35. Law amending and supplementing the Accountancy Act (2016). Available online at: https://dv.parliament.bg/DVWeb/showMaterialDV.jsp?idMat=22578

36. European Commission. Omnibus package. 26.02.2025. Available at: https://finance.ec.europa.eu/news/omnibus-package-2025-04-01_en

37. UN Women's Empowerment Principles. Available in Bulgarian at: https://www.weps.org/sites/default/files/2020-04/FLYER%20WEPs%20web-20191107165656.pdf

38. DIVERSE.BG. Diversity Charter in Bulgaria. Available online at: https://diverse-bg.eu/wp-content/uploads/2023/08/Bulgarian-Diversity-Charter.pdf

39. Diversity, equality and inclusion on the private sector in Bulgaria. https://diverse-bg.eu/wp-content/uploads/2024/09/Доклад_Многообразие-равнопоставеност-приобщаване-в-България-1.pdf

40. European Council, Council of the European Union. Combating violence and harassment in the workplace: the Council invites EU Member States to ratify the ILO Convention. Press release 257/24 of 25 March 2024. Available online at: https://www.consilium.europa.eu/bg/press/press-releases/2024/03/25/combatting-violence-and-harassment-in-the-workplace-council-invites-eu-countries-to-ratify-ilo-convention/

41. European Institute for Gender Equality. Costs of Gender-Based Violence in the European Union. Available online at: https://eige.europa.eu/gender-based-violence/costs-of-gender-based-violence

Bulgarian Foundation for Business and Human Rights © 2025

www.bfbhr.org