

Strategic Framework and Action Plan Enhancing Women's Representation on Corporate and Public Boards in Lebanon



**Policy Brief by Lara Saade- Policy &
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Lara Saade- Policy & Gender Expert Overview

This *Strategic Framework and Action Plan* offers a comprehensive and actionable approach to advancing women's representation on corporate boards in Lebanon. Developed for the Lebanese League for Women in Business (LLWB), this document lays out a clear roadmap for implementing meaningful change across both the public and private sectors.

The framework is structured around four key components:

1. A thorough analysis of the current landscape and the systemic challenges hindering women's representation on corporate boards in Lebanon
2. Targeted, sector-specific strategies and regulatory recommendations tailored to the complexities of Lebanon's economic and business environment
3. A practical advocacy roadmap designed to guide LLWB's engagement with public institutions, private sector actors, and civil society
4. Clear implementation guidelines—including a timeline, monitoring and evaluation framework, and success metrics—to track progress and ensure accountability

This document serves as both a strategic vision and an operational plan. It provides concrete steps to promote gender diversity and foster inclusive corporate leadership, while recognizing the unique regulatory, legal and cultural dynamics that shape decision-making in Lebanon

Executive Summary

Despite ongoing efforts to promote gender equality, the representation of women on corporate boards in Lebanon remains significantly below global standards. Women currently hold only 13% of board seats in Lebanese joint-stock companies- compared to a global average of 23.3%.¹ This gap reflects a confluence of persistent gender norms, inadequate governance frameworks, and structural barriers that systematically exclude women from leadership.

This strategic framework outlines a multi-pronged plan for the Lebanese League for Women in Business (LLWB) to lead national advocacy efforts, propose legal and policy reforms, and partner with key stakeholders to drive meaningful change. The objective is not only to increase the number of women on boards but also to reshape the broader ecosystem in which board appointments are made. Key recommended actions include implementing a phased 30%

¹ <https://www.ifc.org/content/dam/ifc/doc/mgrt/women-on-board-in-lebanon.pdf>

gender quota starting with listed companies, extending reform to sector-specific regulatory bodies, establishing incentive mechanisms, and creating a Women on Boards Observatory for monitoring progress.

Current Landscape

The underrepresentation of women on corporate boards in Lebanon is both stark and systemic. An analysis of nine companies listed on the Beirut Stock Exchange reveals that women occupy just 6.3% of board seats—only four out of 63 available seats. The average board consists of seven members, with sizes ranging from five to ten. Alarming, two-thirds of these companies (66.7%) have all-male boards. Among the remaining firms, 22% have one female director, while only 11% include two women.

Several interrelated barriers continue to impede progress:

- **Lack of standardized governance frameworks** hinders the institutionalization and monitoring of gender diversity initiatives.
- **Absence of legal incentives or requirements** for gender-balanced representation, alongside restrictive share ownership rules, limits access for women.
- **Restrictive share ownership requirements**—which have traditionally limited board eligibility—continue to pose obstacles, although this has been partially addressed by a 2019 amendment to the code of commerce, allowing the appointment of independent directors who do not hold shares.
- **Deeply embedded societal norms** continue to favor male leadership and influence informal selection processes for board appointments.

While the introduction of a 30% gender quota would create approximately 15 new board seats for women, this represents only a modest step forward. Quotas, though valuable as a starting point, are not sufficient to dismantle the deeper structural and cultural barriers that continue to limit women's access to leadership roles. Addressing these challenges requires a holistic, multi-dimensional approach that moves beyond minimum compliance and aims to foster lasting, inclusive transformation within Lebanon's corporate governance ecosystem.

To meaningfully enhance gender representation on corporate boards in Lebanon, it is essential to combine regulatory reform with broader institutional, cultural, and market-driven strategies. This policy paper will present multiple entry points for change, drawing on successful international experiences and adapting them to Lebanon's legal, economic, and social context. It will also provide practical, evidence-based recommendations for the Lebanese League for Women in Business (LLWB) to champion in its advocacy efforts with public authorities, private sector actors, and civil society stakeholders.

The Case for a Gender Quota Law—But Not a Standalone Solution

The introduction of a gender quota law is a necessary first step to correct the systemic underrepresentation of women on corporate boards in Lebanon. A legal obligation for publicly listed companies to allocate at least 30% of board seats to women will create an enforceable standard and send a powerful signal to the broader business ecosystem. This aligns Lebanon with global trends where quota laws have proven effective in increasing women's board participation, notably in countries like France, Norway, and Italy.

However, a quota law alone is not sufficient. As global evidence suggests, without the complementary scaffolding of regulatory frameworks, monitoring mechanisms, and cultural shifts, quotas may lead to tokenism or stagnate at minimum compliance levels. Structural barriers—such as opaque nomination processes, entrenched male networks, and uneven governance standards—will continue to limit progress unless they are explicitly addressed through a broader reform package.

Regulatory Reform: Starting with Publicly Listed Companies and the Capital Markets

Authority

Given international precedents and the symbolic importance of the capital market, publicly listed companies are the ideal starting point for legal and regulatory reform.

Capital Markets Authority (CMA): Leverage Regulatory Power

The Capital Markets Authority (CMA), which regulates Lebanon's nine publicly listed companies, is a critical institutional actor in this agenda. While the number of listed firms is relatively small, the CMA's authority and independence, as granted by Law 161, position it as a standard-setter for corporate governance.

Recommended Actions:

1. Phased Gender Quota Implementation

LLWB should advocate for a graduated quota system, modeled after Tunisia's approach:

- o Year 1: Minimum one woman per board
- o Year 3: 20% representation
- o Year 5: 30% representation

2. Amend Listing Requirements

The CMA should revise listing rules to require all listed companies to:

- o Disclose gender diversity metrics in their annual reports
- o Include a gender diversity policy with measurable objectives
- o Report on progress in board renewal and succession planning

3. Adopt a Comply-or-Explain Framework

Similar to Canada and the UK, the CMA could enforce a disclosure regime whereby companies that fail to meet gender diversity thresholds must publicly explain their

rationale and plans for improvement.

4. Introduce Sanctions

Failure to disclose gender diversity metrics or implement policies should trigger regulatory sanctions (e.g., fines or public listing warnings).

Extending Reform to Sector-Specific Regulatory Bodies

To scale impact beyond the small pool of listed firms, reforms must extend to sectors where regulatory oversight allows for broader influence over corporate governance. Several sectors in Lebanon—particularly banking, insurance, and media—are governed by dedicated regulatory bodies with the capacity to set boardroom standards.

1. Banking Sector – Banque du Liban and the Banking Control Commission

Banque du Liban (BDL), Lebanon’s central bank, has issued detailed corporate governance guidelines for banks, including requirements for independent board members, succession planning, and board evaluations. These provisions provide a ready-made entry point for embedding gender diversity standards.

Recommended Actions:

- Amend BDL Circulars to explicitly include gender diversity targets for board composition.
- Require annual gender diversity reporting by all banks.
- Leverage existing Basel Committee on Banking Supervision governance standards, which many Lebanese banks already follow, to incorporate gender diversity principles as an element of sound governance practice.
- Introduce incentives such as eligibility for preferential financial instruments or public recognition for banks that meet or exceed benchmarks.
Impose compliance-linked sanctions, e.g., withholding dividend distribution or suspending licensing processes.

2. Insurance Sector – Insurance Control Commission (ICC)

The ICC oversees over 60 licensed insurers and holds regulatory authority to influence corporate governance practices.² While no comprehensive governance code yet exists for insurance companies, the development of such a code presents an opportunity to integrate gender diversity requirements from the outset.

Recommended Actions:

² <https://www.insurancecommission.gov.lb/?lang=en>

- Develop a Corporate Governance Code for Insurance Companies that includes
 - mandatory gender diversity provisions.
 - Introduce a comply-or-explain model for board composition disclosures in insurers' annual filings.
- Incentivize compliance by linking gender diversity to licensing approvals and renewals.

3. Other Regulated Sectors – Pharmaceuticals and Media

In sectors like pharmaceutical manufacturing and media, regulatory leverage can be used to introduce diversity reporting and voluntary guidelines that encourage change.

For instance:

- The **Ministry of Public Health** could integrate gender diversity considerations into Good Manufacturing Practice (GMP) compliance audits by expanding the scope of audit criteria to include evaluation of gender diversity policies and practices within pharmaceutical manufacturers.
- The **Ministry of Information** could require media companies to report on board composition and adopt diversity charters.

Reform Proposals for Private and Unlisted Companies

While listed companies and regulated sectors offer clear regulatory levers, the majority of Lebanon's corporate activity lies within private and unlisted firms, particularly SALs and SARLs. These companies, many of which are family-owned or operate outside strict regulatory frameworks, have even fewer women in leadership roles. To meaningfully shift the national landscape, gender diversity efforts must reach beyond the formal capital markets and into the broader business ecosystem.

Targeting Large Private Companies

A differentiated approach is needed, beginning with large-scale SAL and SARL companies—those with annual revenues above USD 5 million or a workforce exceeding a defined threshold (e.g., 50+ employees).

Recommended Actions:

1. Phased Quota Guidelines

- Introduce **progressive targets** for private firms based on company size and sector:
- o Year 1–2: Minimum one woman on the board
 - o Year 3–5: Gradual increase to 30% board representation

2. Voluntary Adoption of Governance Codes

Encourage large private firms to adopt the Lebanese Code of Corporate Governance,

with an annex on gender diversity, emphasizing how this improves access to investment, donor funding, and partnerships.³

3. Incentive Mechanisms

- o Tax incentives for companies that meet gender representation benchmarks (e.g., 10% reduction in corporate tax for achieving $\geq 30\%$ women on boards).
- o Public procurement advantages: Gender-diverse companies receive priority in bidding for government contracts or access to IDAL/Kafalat-backed financing.
- o Recognition programs: Create national rankings or awards to highlight gender-diverse companies.

4. Public Reporting and Transparency

Encourage firms to publicly disclose gender composition of boards and senior management—whether through a national database, LLWB platform, or within annual business declarations.

Expanding Reform to Public Boards and State-Owned Enterprises (SOEs)

Public institutions and State-Owned Enterprises (SOEs) represent a powerful entry point for promoting gender-balanced leadership. As state-affiliated entities, public institutions and SOEs are well-positioned to model inclusive governance and set an example for the private sector. Ensuring the representation of women on public boards also reinforces the government's commitment to gender equality in leadership and fulfills Lebanon's obligations under international frameworks such as the CEDAW and the SDG 5 (Gender Equality).

A recent study analyzing the boards of 53 Lebanese public institutions from the 1950s to 2024 reveals:

- **Low Representation:** Women occupy only 5.3% of board positions, far below regional averages (e.g., Tunisia 23.1%, Morocco 19.8%).
- **Sectoral and Geographic Disparities:** Representation is highest in cultural and educational institutions (8.6%) and lowest in infrastructure and technical sectors (1.3%). Urban-based institutions, particularly in Beirut and Mount Lebanon, account for 65% of female appointments.
- **Qualification vs. Tenure Gap:** Women are generally more qualified (72% with advanced degrees vs. 58% for men) yet face shorter tenures (3.8 vs. 5.2 years) and lower reappointment rates (38% vs. 67%).

³ https://www.ebrd.com/content/dam/ebd_dxp/assets/pdfs/legal-reform/corporate-governance/sector-assessment/l/lebanon_cgcode_2010_en.pdf

- **Systemic Barriers:** Appointments are shaped by political patronage, sectarian quotas, and male-dominated informal networks, resulting in merit being overlooked. Only two women have ever held chair or vice-chair positions.

These findings underscore the urgency of structural reform and cultural change in Lebanon's public governance framework.

Recommended Actions:

1. Mandate Gender Parity on Public Boards

- o Amend relevant decrees and internal regulations governing public institutions and SOEs to mandate a minimum of 30% female representation on boards by 2030.
- o Apply these requirements across major SOEs and public institutions, including utilities (e.g., Electricité du Liban), telecommunications (e.g., OGERO), infrastructure, and service providers.
- o Integrate gender parity requirements into future restructuring and governance reforms under public sector modernization programs.

2. Establish Governance Guidelines for Public Institutions

- o Develop and adopt a national code of corporate governance for public institutions and SOEs with explicit and enforceable gender diversity standards.
- o Align public governance frameworks with global best practices (e.g., OECD Guidelines on Corporate Governance of SOEs).
- o Require all public boards to submit gender composition and policy reports to the Civil Service Board.

3. Reform the Appointment Process

- o Introduce transparent appointment criteria and establish nomination committees to assess candidates based on merit, diversity, and sectoral needs.
- o Ensure all calls for nominations are publicly announced and selection criteria are disclosed.

4. Public Reporting and Transparency

- o Publish an annual Public Sector Governance Report including board composition data disaggregated by gender.
- o Establish a digital dashboard to track compliance and highlight leading institutions.

5. Champion Public Sector Leadership

- o Launch a "Women Leading Public Boards" initiative to showcase success stories and create visibility for female leadership in public institutions.
- o Promote inter-ministerial cooperation and involve entities like the National Commission for Lebanese Women (NCLW) in setting policy standards.

- o Facilitate training and mentorship programs for women in public administration to prepare future board candidates.

6. Address Informal and Cultural Barriers

- o Conduct awareness campaigns to shift societal perceptions and build support for inclusive leadership.
- o Partner with universities and civil society to deliver capacity-building programs tailored to public sector board leadership.

Integrating gender diversity within the governance structures of public boards not only supports equity but strengthens transparency, accountability, and public trust. As the largest and most visible employers and service providers, public institutions must lead by example in reshaping Lebanon's leadership landscape and fostering an inclusive governance culture that reflects the diversity of its population.

Roadmap for LLWB's Advocacy

Achieving systemic change requires coordinated, sustained, and strategic engagement. LLWB is uniquely positioned to lead this movement by leveraging its networks, credibility, and sectoral knowledge.

1. Policy Advocacy and Legislative Engagement

- Draft and Promote the Gender Quota Law: Propose a law mandating a 30% quota for listed companies and large private firms, with a phased implementation timeline.
- Engage Key Legislators: Target MPs on economic, finance, and women's affairs committees to champion the draft law.
- Pursue Amendments to Sector Laws: Propose changes to the Monetary and Credit Law, Insurance Law, and licensing regulations to embed gender diversity obligations.

2. Regulatory Engagement

Target Regulatory Bodies to Implement or Amend Guidelines:

- Capital Markets Authority (CMA): Amend listing rules to introduce mandatory gender reporting and progressive quotas.
- Banque du Liban (BDL) and Banking Control Commission: Integrate gender diversity into existing circulars on board governance and compliance.
- Insurance Control Commission (ICC): Collaborate to draft a corporate governance code that includes gender metrics.
- Ministries (Finance, Economy, Information, Public Health): Advocate for gender diversity reporting and integration into licensing and sector oversight.

3. Multi-Stakeholder Coalition Building

LLWB should build a national coalition for women on boards, bringing together:

- Chambers of Commerce
- Progressive corporate leaders and family businesses
- Industry associations (banking, insurance, pharma, media)
- Universities, business schools, and governance experts
International corporate governance networks (e.g., INSEAD Corporate Governance Centre, European Corporate Governance Institute)
- International organizations (e.g., IFC, UN Women, World Bank)

This coalition can serve to legitimize the agenda, align private and public interests, and push for reform with a unified voice.

4. Awareness and Culture Shifting

- Campaigns and Storytelling: Launch a national campaign to highlight the business case for diverse boards and showcase female board members.
- Mentorship Programs: Partner with universities and business networks to create a pipeline of qualified women for board positions.
- Research and Monitoring: Establish a Women on Boards Observatory, modeled after Egypt's example, to collect data, publish annual reports, and track company performance.

Next Steps

This strategic framework lays out a clear and actionable roadmap for transforming boardrooms in Lebanon into more inclusive and effective leadership spaces. It positions LLWB to lead a historic shift—through legislative advocacy, regulatory reform, private sector engagement, and public pressure.

Implementation Timeline and Monitoring Framework

Strategic Framework for Enhancing Women’s Representation on Corporate and Public Boards in Lebanon

Implementation Timeline (2025–2030)

Phase	Key Actions	Lead Actors
Phase 1: Foundation & Advocacy	<ul style="list-style-type: none"> ▪ Finalize gender quota legislative proposal ▪ Launch national advocacy campaign ▪ Initiate high-level dialogue with CMA, BDL, ICC <p>Build multi-stakeholder coalition</p>	LLWB, MPs, CMA, BDL, ICC, MoF, MoE, UN Women, IFC
Phase 2: Legal & Regulatory Reform	<p>Pass quota law for listed companies and large SAL/SARLs</p> <p>CMA amends listing requirements to include reporting and phased quotas</p> <ul style="list-style-type: none"> ▪ BDL and ICC revise governance circulars ▪ Sectoral ministries incorporate diversity metrics into licensing 	Parliament, CMA, BDL, ICC, sector ministries
Phase 3: Pilot Implementation	<p>Enforce 1-woman minimum quota for listed companies</p> <p>Begin public reporting on board diversity</p> <ul style="list-style-type: none"> ▪ Launch pilot programs in banking, insurance, pharma sectors ▪ Begin applying tax and procurement incentives 	CMA, BDL, ICC, LLWB, MoF, MoE
Phase 4: Scale & Strengthen	<ul style="list-style-type: none"> ▪ Increase quota to 20% (Year 3) ▪ Expand reforms to other regulated sectors <p>Public boards (SOEs) implement parity targets</p> <p>Strengthen enforcement mechanisms</p>	All regulators, SOEs, LLWB, Ministry of Finance
Phase 5: Review & Institutionalize	<ul style="list-style-type: none"> ▪ Independent evaluation of implementation <p>Publish national Women on Boards Scorecard</p> <p>Institutionalize the Women on Boards Observatory</p>	LLWB, external evaluator, coalition members

Monitoring and Evaluation Framework

Objective: To track progress and ensure accountability in the implementation of gender diversity measures on corporate boards across public, private, and sector-specific entities.

Monitoring Dimension	Indicator	Source	Frequency	Responsible Actor
Legal Compliance	Number of companies complying with legal quotas	Official registries, CMA reports	Annual	CMA, BDL, ICC
Regulatory Adoption	Number of regulatory bodies issuing gender diversity requirements % of women on boards by sector and company type	Official Gazette, circulars	Annual	LLWB, Legal Taskforce
Board Composition	% of companies publishing gender diversity policies	Company annual reports, stock exchange data, Company websites, disclosures	Annual	LLWB Observatory
Policy Transparency	Number of companies applying for diversity-linked incentives		Annual	CMA, ICC, BDL
Incentive Uptake	Reach and impact of national campaigns Number of qualified women	MoF, IDAL, Kafalat data LLWB registry,	Annual	MoF, IDAL
Public Awareness		Media analytics, survey data	Annual	LLWB, partners
Pipeline Development	nominated to boards	nominations log	Biannual	LLWB, private sector partners

This timeline and M&E framework provide LLWB and its partners with a structured, measurable pathway to achieve gender diversity on corporate boards in Lebanon by 2030.

Conclusion

Advancing women's representation on corporate and public boards in Lebanon is not only a matter of equity, but also one of economic performance, governance quality, and national credibility. This strategic framework provides LLWB and its partners with a robust foundation for action. The path forward requires legal reforms, institutional commitment, and cultural change. With leadership, persistence, and cross-sectoral collaboration, Lebanon can set a new standard for inclusive corporate governance in the region.