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# Gender Equality Plan

## 2026 – 2028

A strategic commitment to gender equality, diversity, and inclusion in research and innovation consultancy

Adopted by the Managing Director

1 April 2026

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# 1. Foreword and Management Commitment

Polaris Impact AB is firmly committed to fostering gender equality, diversity, and inclusion as foundational principles in all aspects of our work. As a research management and innovation consultancy operating within the European Research Area, we recognise that gender equality is not only a fundamental right but also a driver of excellence in research and innovation.

This Gender Equality Plan (GEP) sets out our strategic vision, concrete actions, and measurable targets for advancing gender equality within our organisation and in the services we provide to our clients. It has been developed in alignment with the Horizon Europe eligibility requirements, the Swedish Discrimination Act (Diskrimineringslagen, SFS 2008:567), and the European Commission's guidance on Gender Equality Plans.

As a small and medium-sized enterprise (SME) specialising in Horizon Europe project management, grant proposal development, dissemination, and impact assessment, we hold a unique position to promote gender equality not only within our own operations but also through the advisory services we deliver to research institutions and consortia across Europe.

**Management Statement:** I, as Managing Director of Polaris Impact AB, hereby formally adopt this Gender Equality Plan and commit the necessary resources for its full implementation. Gender equality is integral to our mission of driving research impact, and this plan reflects our determination to lead by example in the European research and innovation ecosystem.

Managing Director, Polaris Impact AB  
Lund, 1 April 2026

## 2. About Polaris Impact AB

Polaris Impact AB is a Swedish limited liability company (Aktiebolag) founded in 2026 and headquartered in Lund, Sweden. The company operates as a boutique consultancy specialising in European research funding, with a particular focus on Horizon Europe projects.

### Core Services

- Horizon Europe grant proposal development and writing
- Research project management and coordination
- Dissemination, exploitation, and communication of research results
- Impact assessment and research impact maximisation (ARTIS methodology)
- AI-powered impact intelligence platform (SaaS)
- Training and capacity building for research organisations

### Organisation Profile

As a newly established SME, Polaris Impact AB operates with a lean organisational structure. The company is led by its founder and Managing Director, who also serves as the designated Gender Equality Officer. As the company grows, the organisational structure and gender equality governance will scale accordingly.

Legal Name	Polaris Impact AB
Legal Form	Aktiebolag (Swedish Limited Liability Company)
Headquarters	Lund, Sweden
Founded	2026
Sector	Research Management and Innovation Consultancy
Entity Type	Private-for-profit SME

# 3. Legal and Policy Framework

This GEP is grounded in and compliant with the following legal and policy instruments:

## 3.1 European Framework

- Horizon Europe Regulation (EU) 2021/695: Requires activities under the Programme to eliminate gender bias and inequalities, enhance work-life balance, and promote equality between women and men in research and innovation.
- European Commission Guidance on Gender Equality Plans (2021): Defines four mandatory process-related requirements and five recommended thematic areas for GEPs.
- EU Gender Equality Strategy 2020-2025: Strategic framework for the EU's work on gender equality, aiming to end gender-based violence, challenge gender stereotypes, and close gender gaps in the labour market.
- European Research Area (ERA) Policy Agenda 2022-2024: Prioritises gender equality and mainstreaming in research organisations through institutional change.
- Charter of Fundamental Rights of the European Union (Articles 21, 23): Prohibits discrimination based on sex and requires equality between women and men in all areas.

## 3.2 Swedish National Framework

- Swedish Discrimination Act (Diskrimineringslagen, SFS 2008:567): Requires all employers to take active measures to prevent discrimination on seven grounds (gender, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation, and age) and promote equal rights and opportunities through a continuous four-step approach: investigate, analyse, take measures, monitor/evaluate.
- Swedish Parental Leave Act (Föräldraledighetslag): Provides generous parental leave provisions supporting work-life balance for all parents, contributing to gender equality in the workplace.
- Swedish Work Environment Act (Arbetsmiljölagen): Mandates employers to systematically plan and control the work environment to prevent ill health and accidents, including psychosocial risks.

**Note on SME Applicability:** While private-for-profit SMEs are not subject to the GEP eligibility criterion under Horizon Europe, Polaris Impact AB voluntarily adopts this GEP as a demonstration of its commitment to gender equality and as a best practice for its participation in EU-funded research projects. All employers in Sweden, regardless of size, are required to take active measures under the Discrimination Act.

## 4. Mandatory Process Requirements

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This section demonstrates how Polaris Impact AB fulfils the four mandatory process-related requirements established by the European Commission for Gender Equality Plans under Horizon Europe.

### 4.1 Public Document

This Gender Equality Plan is a formal document adopted by the Managing Director of Polaris Impact AB on 1 April 2026. It is published on the company's official website and is freely accessible to all stakeholders, including employees, clients, project partners, and the European Commission.

- The GEP is published at: [www.polarisimpact.se/gep] (or equivalent company URL)
- The document is signed by the Managing Director (top management)
- The GEP is actively communicated to all staff and subcontractors upon onboarding
- Previous versions of the GEP will be archived and remain accessible on the website

### 4.2 Dedicated Resources

Polaris Impact AB commits dedicated human and financial resources for the implementation of this GEP:

- **Gender Equality Officer:** The Managing Director serves as the designated Gender Equality Officer, responsible for overseeing GEP implementation, monitoring, and reporting. As the company grows, a dedicated position or external consultancy will be considered.
- **Gender Expertise:** The Managing Director possesses extensive expertise in Horizon Europe gender equality requirements through years of experience in EU project management, grant writing, and compliance with cross-cutting priorities. Additional external gender expertise will be engaged as needed for training and audits.
- **Financial Allocation:** A dedicated annual budget line for gender equality activities is established, covering training, awareness-raising materials, external expertise, and monitoring activities. The budget will be reviewed annually and scaled with company growth.
- **Time Allocation:** A minimum of 10% of the Gender Equality Officer's working time is dedicated to GEP implementation and monitoring activities.

### 4.3 Data Collection and Monitoring

Polaris Impact AB commits to systematic collection of sex/gender-disaggregated data on its personnel and operations, with reporting at least every two years:

- **Personnel data:** Gender composition of all staff, consultants, and subcontractors
- **Recruitment data:** Gender breakdown of applicants, shortlisted candidates, and hires
- **Pay data:** Annual pay survey and analysis in line with the Swedish Discrimination Act
- **Training data:** Participation in professional development and gender equality training, disaggregated by gender
- **Project data:** Gender composition of project teams in Horizon Europe projects managed by Polaris

- Client advisory data: Tracking of gender-related advisory services provided to clients

Data is collected annually, with a comprehensive monitoring report produced at least every two years. The first baseline data collection will take place in Q3 2026, with the first full monitoring report due in Q1 2028. All data collection complies with the General Data Protection Regulation (GDPR) and Swedish data protection legislation.

## 4.4 Training and Awareness Raising

Polaris Impact AB provides gender equality awareness-raising activities and training for all staff and decision-makers:

- Annual training: All staff participate in at least one gender equality training session per year, covering topics such as unconscious gender biases, gender-sensitive language, and inclusive work practices.
- Decision-maker training: The Managing Director and any future managers complete enhanced training on gender equality in recruitment, performance evaluation, and organisational culture.
- Onboarding: Gender equality awareness is integrated into the onboarding process for all new employees, consultants, and subcontractors.
- Client-facing training: Polaris integrates gender equality and the gender dimension in R&I; into its training programmes offered to research organisations and project consortia.
- Format: Training may be delivered through in-person workshops, online modules, webinars, or participation in external conferences and professional development events.

## 5. Thematic Areas and Action Plan

This section outlines concrete measures and targets across the five recommended thematic areas established by the European Commission. Each area includes specific, measurable, attainable, realistic, and time-related (SMART) objectives.

### 5.1 Work–Life Balance and Organisational Culture

Polaris Impact AB promotes an inclusive organisational culture that supports work-life balance for all employees, regardless of gender, family status, or personal circumstances.

Measure	Description	Target	Timeline	Responsible
Flexible working arrangements	Offer remote work, flexible hours, and hybrid working models as standard practice for all positions.	100% of positions eligible for flexible work	Ongoing from 2026	Managing Director
Parental leave policy	Encourage equal uptake of parental leave. Ensure all employees are informed of their rights under Swedish law. No penalties for career progression related to parental leave.	Equal awareness and access for all genders	Ongoing from 2026	Managing Director
Workload management	Monitor workload distribution to prevent burnout and ensure equitable allocation of tasks, including administrative and organisational tasks.	Annual workload review	Annually from Q4 2026	Managing Director
Inclusive meeting culture	Schedule meetings within standard working hours. Avoid scheduling during school drop-off/pick-up times where possible. Ensure remote participation options.	90% of meetings within 09:00-16:00	Ongoing from 2026	All staff
Anti-discrimination culture	Maintain a zero-tolerance policy towards all forms of discrimination. Promote an open and respectful work environment. Regularly discuss organisational culture in team meetings.	Annual culture survey implemented	From Q3 2026	Managing Director

### 5.2 Gender Balance in Leadership and Decision–Making

Polaris Impact AB strives for gender balance in leadership and decision-making positions, both within the organisation and in advisory boards or committees established as the company grows.

Measure	Description	Target	Timeline	Responsible
Leadership composition monitoring	Track and report gender balance in all leadership and decision-making positions within the company.	Minimum 40% representation of each gender in leadership by 2028	Biannually from 2026	Gender Equality Officer
Advisory board diversity	When establishing advisory boards or steering committees, ensure gender-balanced composition.	Minimum 40/60 gender balance in advisory structures	Upon establishment	Managing Director
Succession planning	Integrate gender balance considerations into succession planning and leadership development.	Gender-balanced shortlists for all leadership positions	Ongoing	Managing Director
Client project teams	When assembling teams for Horizon Europe projects, actively promote gender-balanced team composition and encourage clients to do the same.	Gender balance guidance provided to 100% of consortium partners	Per project	Project Managers

### 5.3 Gender Equality in Recruitment and Career Progression

Polaris Impact AB ensures fair, transparent, and gender-sensitive recruitment processes and provides equal opportunities for career development and advancement.

Measure	Description	Target	Timeline	Responsible
Gender-neutral job advertisements	Use inclusive and gender-neutral language in all job postings. Highlight flexible working conditions and commitment to diversity.	All job ads reviewed for gender-neutral language	Ongoing	Managing Director
Structured recruitment	Use structured interviews with standardised evaluation criteria to minimise unconscious bias. Ensure diverse shortlists.	100% of recruitment processes use structured evaluation	Ongoing	Managing Director
Equal pay analysis	Conduct annual pay survey to identify and address any gender-based pay gaps, in compliance with the Swedish Discrimination Act.	Zero unexplained gender pay gap	Annually from 2027	Managing Director

Measure	Description	Target	Timeline	Responsible
Professional development	Provide equal access to professional development opportunities, conferences, and training for all employees regardless of gender.	Equal participation rates across genders	Annually monitored	Managing Director
Transparent career paths	As the company grows, establish clear and transparent criteria for career progression that are free from gender bias.	Career framework developed	By Q4 2027	Managing Director

## 5.4 Integration of the Gender Dimension in Research and Innovation

As a consultancy specialising in Horizon Europe projects, Polaris Impact AB holds a particular responsibility and opportunity to promote the integration of the gender dimension into research and innovation content.

Measure	Description	Target	Timeline	Responsible
Gender dimension in proposals	Systematically integrate sex/gender analysis and the gender dimension into all grant proposals written or reviewed by Polaris, in line with Horizon Europe requirements.	100% of proposals include gender dimension analysis	Ongoing	All consultants
Client advisory on gender	Proactively advise research consortia on integrating the gender dimension in their R&I; content, methodology, and impact assessment.	Gender advisory included in all project support contracts	From Q3 2026	Managing Director
ARTIS methodology	Ensure the proprietary ARTIS impact assessment methodology incorporates gender-sensitive indicators and sex-disaggregated impact analysis.	Gender indicators integrated into ARTIS v2.0	By Q4 2026	Managing Director
Knowledge development	Stay current with developments in gendered innovations, sex/gender analysis methods, and best practices through continuous professional development.	Minimum 2 CPD activities per year on gender in R&I;	Annually from 2026	All staff
Dissemination and communication	Apply gender-sensitive language and imagery in all dissemination materials, project deliverables, and company communications.	100% of materials reviewed for gender sensitivity	Ongoing	All staff

## 5.5 Measures Against Gender-Based Violence Including Sexual Harassment

Polaris Impact AB maintains a zero-tolerance policy towards gender-based violence, sexual harassment, and all forms of harassment and discrimination. The company is committed to providing a safe, respectful, and dignified working environment for all individuals.

Measure	Description	Target	Timeline	Responsible
Anti-harassment policy	Establish and maintain a clear anti-harassment and anti-discrimination policy, communicated to all staff, subcontractors, and project partners.	Policy adopted and published	By Q2 2026	Managing Director
Reporting mechanism	Establish a confidential reporting mechanism for incidents of harassment, discrimination, or gender-based violence. Ensure all staff are aware of the procedure.	Mechanism established and shared with staff	By Q2 2026	Gender Equality Officer
Investigation protocol	Define clear procedures for investigating reports of harassment, including timelines, confidentiality safeguards, and disciplinary measures.	Protocol documented and approved	By Q2 2026	Managing Director
Annual review	Review anti-harassment guidelines and reporting mechanisms annually. Assess whether any incidents were reported and evaluate effectiveness of preventive measures.	Annual review completed	Annually from Q1 2027	Gender Equality Officer
External support	Provide information on external support services available to employees, including the Swedish Equality Ombudsman (DO) and employee assistance programmes.	Information provided to all staff	Ongoing from 2026	Managing Director

## 6. Implementation Timeline

The following timeline summarises the key milestones for GEP implementation across the 2026-2028 period:

Period	Key Milestones
Q2 2026	Adoption and publication of GEP on company website; Establishment of anti-harassment policy and reporting mechanism; Communication of GEP to all staff and stakeholders
Q3 2026	First baseline data collection (personnel, pay, recruitment); Integration of gender equality into onboarding process; First gender equality training session for all staff
Q4 2026	Annual workload review; Integration of gender indicators into ARTIS v2.0; First organisational culture survey
Q1 2027	First annual review of anti-harassment policy; Annual pay survey and analysis
Q2 2027	Mid-term review of GEP progress; Update of measures and targets as needed
Q4 2027	Development of career progression framework; Second annual training cycle completed
Q1 2028	First comprehensive GEP monitoring report (biannual); Evaluation of all targets and indicators
Q2 2028	Review and revision of GEP for 2028-2030 cycle; Publication of updated GEP

## 7. Monitoring, Evaluation, and Reporting

Effective monitoring and evaluation are essential to ensure the GEP achieves its intended outcomes. Polaris Impact AB applies the four-step approach mandated by the Swedish Discrimination Act: investigate, analyse, take measures, and monitor/evaluate.

### 7.1 Key Performance Indicators

The following indicators will be tracked and reported:

Indicator	Measurement	Frequency
Gender composition of personnel	% women / % men / % other across all roles	Annually
Gender composition of leadership	% women / % men in decision-making positions	Biannually
Recruitment gender balance	% women / % men among applicants, shortlisted, and hired	Per recruitment cycle
Gender pay gap	Mean and median pay gap between women and men	Annually
Parental leave uptake	Days of parental leave taken, disaggregated by gender	Annually
Training participation	Number and % of staff completing gender equality training	Annually
Gender dimension in proposals	% of proposals with integrated gender dimension analysis	Per proposal
Harassment incidents	Number of reported incidents and resolution outcomes	Annually
Organisational culture	Staff satisfaction scores from annual culture survey	Annually

### 7.2 Reporting Cycle

- **Annual internal review:** The Gender Equality Officer conducts an internal review of all indicators and progress towards targets. Results are discussed with all staff.
- **Biannual monitoring report:** A comprehensive monitoring report is produced every two years, assessing progress against all targets, evaluating the effectiveness of measures, and recommending adjustments.
- **Public reporting:** Summary results are published on the company website alongside the GEP.
- **Continuous improvement:** The GEP is treated as a living document. Measures and targets are adjusted based on monitoring results, organisational changes, and evolving best practices.

## 8. Signatures and Adoption

This Gender Equality Plan has been formally adopted by the top management of Polaris Impact AB and is effective from 1 April 2026 until 31 March 2028, at which point it will be reviewed, updated, and re-adopted for the subsequent period.

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Signature

Managing Director

Polaris Impact AB

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Date

1 April 2026

Lund, Sweden

### Document Control

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Date of Adoption: 1 April 2026

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Next Review: Q1 2028

Approved by: Managing Director, Polaris Impact AB

Published: Company website [[www.polarisimpact.se](http://www.polarisimpact.se)]

# Annex: Regulatory References

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3. European Commission (Gender Equality Plans (GEPs) - Frequently Asked Questions, Updated October 2025.) [https://research-and-innovation.ec.europa.eu/strategy/strategy-research-and-innovation/democracy-and-rights/gender-equality-research-and-innovation\\_en](https://research-and-innovation.ec.europa.eu/strategy/strategy-research-and-innovation/democracy-and-rights/gender-equality-research-and-innovation_en)
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