

## PUBLIC POLICY

# Gender Equality Plan 2026-2029

A proportionate, measurable plan for a growing Croatian maritime deep-tech SME.

**Organisation:** ELNAV.AI d.o.o.

**Version:** 2.1

**Approval date:** 24 September 2026

**Effective date:** 24 September 2026

**Policy owner:** Founder & Chief Executive Officer

**Review cycle:** At least annually and after material legal, organisational or technical change

## 1. Commitment and scope

ELNAV.AI is committed to equal opportunity, dignity and fair treatment in recruitment, pay, work allocation, development, leadership and participation in research and innovation. Gender equality is addressed together with protection from discrimination based on age, disability, race or ethnic origin, religion or belief, sexual orientation, gender identity, family status or another protected characteristic.

This plan applies to employees and other paid personnel, recruitment candidates, interns and trainees, and to governance, project and research activities controlled by ELNAV.AI. Expectations for contractors, suppliers and project partners are applied through the relevant agreement and scope of work.

The plan is designed for a small company, where a single hire can materially change percentages and detailed publication can identify individuals. ELNAV.AI therefore combines internal sex/gender-disaggregated monitoring with privacy-safe public reporting.

## 2. Plan period, ownership and resources

| Item                   | Details                                                                                                                                                                          |
|------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Plan period            | 30 July 2026 to 31 July 2029, unless superseded earlier.                                                                                                                         |
| Plan owner             | Hrvoje Mihovilović, Founder & Chief Executive Officer.                                                                                                                           |
| Implementation support | Administrative support for records, recruitment checks and training evidence; project owners for the R&I gender dimension.                                                       |
| Resources              | Working time within management and administrative duties, plus training, recruitment and external-expertise costs approved through the annual budget or relevant project budget. |
| Review                 | Annual management review, normally completed by 31 March for the preceding calendar year.                                                                                        |
| Public access          | Published on the ELNAV.AI website after signature by top management.                                                                                                             |

### 3. Baseline and workforce updates

The baseline at 30 July 2026 is retained for comparison. The workforce update at 21 September 2026 uses the same paid-workforce scope. Both columns report headcount, not full-time equivalents (FTEs); each person counts once regardless of working arrangement.

Employment status and individual names are not required for the public baseline or update and are therefore not published.

| Indicator                                 | Baseline<br>30 July 2026 | Update<br>21 September 2026 |
|-------------------------------------------|--------------------------|-----------------------------|
| Total headcount                           | 5                        | 5                           |
| Women                                     | 1 (20%)                  | 2 (40%)                     |
| Men                                       | 4 (80%)                  | 3 (60%)                     |
| Other / non-binary /<br>prefer not to say | 0 recorded               | 0 recorded                  |

Leadership remains a single-person category, monitored internally and not reported as a percentage. Technical and role-level groups are monitored internally; small cells are not published where they could identify an individual.

The baseline and update use company records for the stated dates. Future equality data will be collected lawfully, with voluntary self-description where appropriate and an option not to disclose.

### 4. Objectives and actions

#### 4.1 Governance, data and annual reporting

The Plan owner maintains a privacy-restricted annual record of headcount, recruitment, role groups, progression, training access, leadership participation, flexible-work use and compensation review, disaggregated by sex or gender where lawful and meaningful.

KPI: annual review completed and a short privacy-safe progress statement approved by 31 March. Small cells are suppressed or combined. No individual pay or special-category information is published.

#### 4.2 Recruitment and selection

1. Use role-based criteria and gender-neutral job descriptions.
2. Advertise through channels that can reach underrepresented candidates, including women in maritime, engineering and AI communities where relevant.
3. Use a documented shortlist and interview rationale for each vacancy.
4. Aim for at least 40% representation of the underrepresented gender in qualified shortlists where the applicant pool allows; record when the pool does not allow it.
5. Where practicable, involve more than one reviewer and include a woman in the interview process without placing an unreasonable recurring burden on any individual team member.
6. Final selection remains merit- and role-based; shortlist targets are not hiring quotas.

KPI: 100% of vacancies use the recruitment checklist; annual review of applicant, shortlist and appointment patterns.

### 4.3 Representation and leadership

ELNAV.AI aims to improve representation as the team grows, with an objective of at least 30% women in the overall paid workforce by the end of the plan period and a longer-term ambition of 40%. For a team of five to six, the plan-period objective generally means at least two women, subject to hiring needs, applicant availability and merit-based selection.

At 21 September 2026, women represent 40% of the paid workforce (two of five people). This exceeds the 30% plan-period objective and meets the 40% ambition at that date. Both targets are retained and representation will continue to be reviewed as the team changes. This workforce snapshot does not mean that the Plan's wider objectives have been completed.

For future leadership, advisory and project-lead appointments, candidate identification will actively include qualified women and other underrepresented candidates. Appointments are documented against role requirements.

KPI: annual representation review; at least one qualified woman actively considered for each new leadership or advisory appointment where a suitable candidate pool exists.

### 4.4 Equal pay, work allocation and progression

7. Review compensation at least annually by role scope, responsibility, experience, performance and working arrangement.
8. Investigate any unexplained gender difference in comparable work and record the corrective decision.
9. Provide equitable access to technically meaningful work, customer exposure, training, mentoring and project leadership.
10. Do not treat part-time, flexible, parental or family-care arrangements as evidence of lower commitment.

KPI: annual compensation and opportunity review completed. A public pay-gap percentage is not reported where there are no comparable groups or where publication could identify individuals.

### 4.5 Work-life balance and organisational culture

11. Offer flexible hours and remote work where compatible with project, security, customer and laboratory needs.
12. Plan meetings and deadlines with reasonable notice and avoid avoidable out-of-hours expectations.
13. Apply leave, family-care and return-to-work arrangements consistently and without career penalty.
14. Use respectful, inclusive language and challenge stereotypes about maritime, technical or leadership roles.

KPI: annual team feedback includes access to flexibility, workload fairness, inclusion and any barrier to participation.

## 4.6 Prevention of harassment and gender-based violence

ELNAV.AI applies zero tolerance to harassment, sexual harassment, retaliation and gender-based violence. Reports are handled confidentially, promptly and impartially, with protection against retaliation and proportionate corrective action.

A concern may be raised with the CEO or another person designated in employment or project documentation. If the concern involves that person or internal reporting is not appropriate, the reporter may use available external legal, inspection, equality or law-enforcement channels.

KPI: all personnel receive reporting information; reports are acknowledged promptly and normally within five working days; outcome and follow-up are documented with access restricted to those who need it.

## 4.7 Gender dimension in research and innovation

Every new human-facing R&D project considers whether sex or gender may affect user needs, data representativeness, system performance, accessibility, alert interpretation, work organisation or deployment impact. If the dimension is not relevant, the project records a short justification.

15. Assess data and test coverage for relevant differences without using protected characteristics for unrelated profiling.
16. Consider bridge, vessel, training and PPE contexts that may differ across users.
17. Review whether false positives, missed detections, speech performance or interface design create unequal effects.
18. Include gender-sensitive recruitment and consent practices in studies involving people.
19. Report material limitations and avoid demographic performance claims without adequate samples.

KPI: 100% of new human-facing R&D projects complete a gender-dimension relevance check at kickoff and at major validation.

## 4.8 Training and awareness

All personnel and regular decision-makers complete basic gender-equality, anti-harassment and unconscious-bias awareness within six months of joining and at least once every two years. Additional practical guidance is provided to anyone leading recruitment, people management or human-participant research.

KPI: 100% completion within the applicable timeframe, with attendance or completion evidence retained.

# 5. Monitoring indicators

| Indicator               | Measure                                                                                                             |
|-------------------------|---------------------------------------------------------------------------------------------------------------------|
| Representation          | Headcount by sex/gender; overall share of women; privacy-safe role and leadership analysis.                         |
| Recruitment             | Applicants, qualified shortlists, interview panels, offers and appointments by sex/gender where data are available. |
| Progression             | Access to training, mentoring, project leadership and promotion opportunities.                                      |
| Pay and work allocation | Annual review of comparable work, responsibility, working arrangement and unexplained differences.                  |
| Work-life balance       | Use of flexible arrangements and team feedback, without publishing identifiable individual data.                    |
| Safety and culture      | Training completion, awareness of reporting routes, number and handling status of concerns.                         |
| R&I content             | Share of new human-facing projects with a documented gender-dimension relevance check.                              |

## 6. Governance and review cycle

20. The Plan owner collects the prior year's data and implementation evidence.
21. Management reviews progress, barriers, complaints, corrective actions and resource needs.
22. A privacy-safe annual statement records completed actions and priorities for the next year.
23. The plan is updated earlier if headcount, structure, law, funding requirements or organisational risk changes materially.
24. A new plan is approved before the end of the current plan period.

## 7. Horizon Europe process alignment

This plan addresses the four process elements commonly used in Horizon Europe GEP assessments: a public document approved by top management; dedicated resources and responsibility; sex/gender-disaggregated data with regular reporting; and training and awareness for staff and decision-makers.

It also addresses the recommended thematic areas of work-life balance and culture, leadership, recruitment and career progression, the gender dimension in R&I content, and measures against gender-based violence and sexual harassment. Eligibility remains subject to the rules of the specific call and ELNAV.AI's legal-entity classification.

## 8. Contact

Questions about this plan or its implementation may be sent to Hrvoje Mihovilović at [hrm@elnav.ai](mailto:hrm@elnav.ai) or to [info@elnav.ai](mailto:info@elnav.ai).

## Document history

| Version     | Change                                                                                                                                                                                                                                                                                                                                                                                         |
|-------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Version 1.0 | Original public document.                                                                                                                                                                                                                                                                                                                                                                      |
| Version 2.0 | 30 July 2026. Updated the workforce baseline to five people; removed individual employee names, employment-status details, unverified HR tools, fixed FTE allocations, named external reporting services and unsupported budget commitments; replaced them with proportionate governance, privacy-safe monitoring and measurable 2026-2029 actions.                                            |
| Version 2.1 | 24 September 2026. Retained the 30 July 2026 baseline and added the 21 September 2026 workforce update: five people, two women (40%) and three men (60%). Clarified headcount methodology, updated recruitment wording and recorded progress against the existing representation targets. Plan period, governance and other commitments remain unchanged. Approved and effective on this date. |

## Approval

This revision is approved by ELNAV.AI's top management and takes effect on 24 September 2026, superseding version 2.0. It is intended for publication on the company website.

**Approved by:** Hrvoje Mihovilović

**Role:** Founder & Chief Executive Officer

**Date:** 24 September 2026

Signature: 