AAI LABS

GENDER EQUALITY PLAN

2026-2035

Horizon Europe-aligned, proportionate implementation framework

AAI Labs is an international applied artificial intelligence company. This plan records the company's standing approach to gender equality and is designed to align with the Horizon Europe Gender Equality Plan process requirements through proportionate, low-administration implementation using existing company processes and records.

Approved by the Chief Executive Officer of
UAB Taikomasis dirbtinis intelektas (AAI Labs)

Date of adoption: 13 August 2026

Foreword

AAI Labs develops applied artificial intelligence systems and participates in research and innovation activities with partners in Lithuania and internationally. The company is committed to equal opportunities, fair treatment, a respectful working environment, and research practices that consider sex and gender where these factors are relevant.

This Gender Equality Plan (GEP) is intended to be practical. AAI Labs is an SME, so the plan uses existing management, HR, payroll, project, and communication processes wherever possible. It does not create administrative structures for their own sake. At the same time, it contains the elements expected of a Horizon Europe-style GEP: public endorsement, identified responsibility and resources, annual monitoring based on available sex-disaggregated data, and proportionate awareness or training activity.

The plan takes effect on 13 August 2026 and remains in force through 31 December 2035. Its policy principles remain stable over that period, while the implementation can be adjusted when company circumstances, legislation, Horizon Europe rules, grant agreements, or project needs change.

Dr. Aistis Raudys
Founder and Chief Executive Officer
UAB Taikomasis dirbtinis intelektas (AAI Labs)
Date: 13 August 2026

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1. Purpose, scope and approach

This Gender Equality Plan sets out the framework used by AAI Labs to maintain equal opportunities for women and men, prevent discrimination and harassment, and consider the relevance of sex and gender in research and innovation activities.

The plan applies to employees and, where relevant, persons working in contracted project teams. It covers recruitment, career development, pay and working conditions, organisational culture, leadership and decision-making, workplace conduct, and research and innovation content.

1.1 Proportionate implementation

AAI Labs implements this plan proportionately to its size, structure and activities. Measures are integrated into existing company processes. Existing records and ordinary management time are used first; separate committees, software systems, budget lines, surveys, or stand-alone procedures are introduced only where they add value or are required by law, a funding programme, a grant agreement, a client, or a specific project.

The plan is a standing policy framework rather than a promise to launch new initiatives every year. Where no relevant activity occurs in a given year - for example, no recruitment or promotion - the corresponding indicator may simply be recorded as not applicable.

1.2 Core principles

- Employment and professional decisions are based on objective factors such as role requirements, competence, performance, experience, responsibility and market conditions, not gender.
- Discrimination, sexual harassment, gender-based violence and retaliation are not accepted.
- Women and men have equal access to recruitment, career development, mentorship, project responsibility and leadership opportunities.
- Flexible and remote-working arrangements are applied on equal terms where compatible with the role and project needs.
- Sex and gender are considered in research, datasets, AI models, evaluation and product design when they are scientifically, technically, legally or socially relevant.
- Implementation should be evidence-based and proportionate, with privacy protected in small teams.

2. Horizon Europe alignment

The European Commission identifies four mandatory process-related requirements for organisations subject to the Horizon Europe GEP eligibility criterion. This plan is structured so that AAI Labs can address those requirements through lightweight implementation.

1. Public document: This plan is formally approved by the CEO, published on the AAI Labs website and communicated internally through existing channels at adoption and when materially updated.

2. Dedicated resources: The CEO is the plan owner. A designated employee may coordinate monitoring or a specific issue. Necessary working time is allocated within existing roles, and gender equality expertise is provided internally or through external expertise where needed.

3. Data collection and monitoring: Once each year, AAI Labs reviews a concise set of available sex-disaggregated personnel indicators and records the outcome in a short annual monitoring note. The note may state that no material issue or corrective action was identified.

4. Training and awareness: At least one proportionate awareness or training action is maintained each year. It may be satisfied through onboarding content, a short internal reminder or briefing, circulation of guidance, or targeted training when a role or project requires it.

The Commission also recommends five thematic areas for GEP content: work-life balance and organisational culture; gender balance in leadership and decision-making; gender equality in recruitment and career progression; integration of the gender dimension into research and innovation content; and measures against gender-based violence, including sexual harassment. These areas are covered in Section 6.

Whether the Horizon Europe GEP eligibility criterion formally applies to AAI Labs depends on the organisation category and the rules applicable to the specific call. Where a call, grant agreement or other binding rule imposes a more specific requirement, that requirement prevails.

3. Governance and resources

The Chief Executive Officer has overall responsibility for this plan and approves material updates. The CEO may designate an employee or another responsible person as GEP coordinator for monitoring, communication, a specific project, or a particular issue.

Dedicated resources are provided primarily through allocated working time within existing management, HR/operations, finance, research and project roles. The amount of time is proportionate to the activity required in the relevant year. A permanent Gender Equality Working Group and a separate annual budget line are not required by this plan.

Where specialist advice, training, data analysis or an independent contact is appropriate, AAI Labs may use external resources or partner expertise. Project-specific responsibilities may also be assigned where required by a funding programme or grant agreement.

4. Data collection, monitoring and annual reporting

AAI Labs uses records it already maintains to support proportionate annual monitoring. No new personal data is collected solely for this plan unless there is a clear need. Data is aggregated or suppressed where small numbers could identify individuals.

Once each calendar year, the CEO or designated coordinator completes a short monitoring note using the template in Appendix A. The review may normally be completed from existing HR, payroll, recruitment and project records. It is sufficient for the note to record that an area was not applicable or that no material issue was identified.

The annual review considers, where data exists and sample size makes comparison meaningful:

- workforce composition by sex;
- recruitment activity by sex, if recruitment occurred;
- promotion or material career-progression outcomes by sex, if applicable;
- pay or remuneration patterns in comparable roles where meaningful and legally appropriate;
- composition of management, senior technical and project leadership roles;
- use of parental/care-related leave or flexible arrangements where review is meaningful;
- number of reported discrimination, harassment or gender-based violence cases in aggregate form;
- whether relevant R&I proposals or projects considered the sex/gender dimension where applicable.

The annual monitoring note constitutes the annual reporting mechanism under this plan. It is retained internally. A separate public annual report is not required unless AAI Labs chooses to publish one or a binding programme rule requires publication.

If monitoring identifies a material unexplained difference or a workplace concern, the CEO decides on a proportionate follow-up. If no issue is identified, no additional action is required beyond recording the review.

5. Training and awareness

AAI Labs maintains awareness of gender equality among staff and decision-makers through proportionate activities integrated into ordinary work. At least one awareness or training action is recorded each year. There is no prescribed duration, format or provider under this plan.

An annual action may consist of one or more of the following:

- including the GEP and expected standards of conduct in onboarding material;
- a short internal reminder or briefing on equal treatment, harassment prevention or unconscious bias;
- circulating appropriate European Commission, EIGE or other authoritative guidance;
- targeted guidance for a hiring manager, project lead or research team where a relevant issue arises;

- project-specific training required by a Horizon Europe call, grant agreement, client or consortium.

Participation or circulation is recorded in the annual monitoring note. Additional training is provided when there is a practical reason, identified risk, incident, legal requirement or project requirement.

6. Action Plan

The action plan below follows the thematic areas commonly used in Horizon Europe GEPs. It deliberately distinguishes standing measures from activities that are only needed when the relevant situation occurs.

Area / objective	Standing measures	Timing	Responsibility	Evidence / indicator
Work-life balance and organisational culture	Maintain equal access to flexible/remote work where compatible with business needs. Schedule work and meetings reasonably where possible. Maintain respectful, non-discriminatory communication and conduct.	Ongoing; reviewed annually at high level.	CEO / relevant manager	Any material issue noted; relevant flexible-work or leave information reviewed where meaningful.
Leadership and decision-making	Select leaders and project roles using competence, experience, responsibility, availability and project needs. Avoid gender-based exclusion. Review composition of management and senior/project leadership.	When roles are assigned; annual monitoring.	CEO / project leads	Leadership composition by sex; issues/action only if a material concern is identified.
Recruitment and career progression	Use gender-neutral vacancy wording and objective role-related selection criteria. Base progression and remuneration on objective factors. Review unexplained material differences if identified.	When recruiting, promoting or setting remuneration; annual monitoring where applicable.	CEO / hiring or relevant manager	Recruitment/progression data where activity occurred; pay comparison where meaningful; otherwise N/A.
Gender dimension in R&I content	For relevant proposals and projects, consider whether sex or gender affects research questions, data, model performance, users, evaluation, bias, risk or impact. Address and document it where material.	At proposal/project planning where relevant.	Research / project lead	Relevant proposal/project contains appropriate consideration, or records that the dimension is not relevant.
Gender-based violence, harassment and discrimination	Maintain a clear expectation of zero tolerance. Staff may raise concerns confidentially with the CEO or another designated contact. Handle concerns promptly, fairly and with privacy protection.	Ongoing; action if a concern arises.	CEO / designated contact	Number of reported cases in aggregate; actions recorded confidentially where required.
Data collection and monitoring	Use existing records for a concise annual review of relevant sex-disaggregated indicators. Avoid collecting unnecessary personal data. Complete the annual monitoring note.	Once per calendar year.	CEO / designated coordinator	Annual monitoring note completed; no lengthy report required.
Training and awareness	Maintain at least one proportionate gender equality awareness/training action each year for staff and decision-makers. This may include onboarding content, a short reminder/briefing, guidance circulation or targeted training.	At least annually; additional activity as needed.	CEO / designated coordinator	Date and form of annual awareness/training action recorded.
Publication and communication	Keep the approved plan available on the company website and communicate it internally through existing channels at adoption and after material updates.	Ongoing; on material update.	CEO / communications	Current signed plan available; material updates communicated.

7. Communication and publication

This plan is approved by the Chief Executive Officer and published on the AAI Labs website. The current version is made available to staff through existing internal channels. New staff may be directed to the plan during onboarding.

The company does not need to run a separate communication campaign. Material changes are communicated through ordinary company channels, and project-specific information is shared with the staff involved.

8. Review and update

The policy takes effect on 13 August 2026 and remains in force through 31 December 2035. The annual monitoring note is a lightweight implementation check and does not require the full GEP document to be rewritten or re-approved each year.

The GEP itself is updated only when there is a material reason, such as a change in law, Horizon Europe guidance, funding requirements, company structure, identified monitoring issue, or operational practice. A review may conclude that no change is needed.

Before the end of 2035, AAI Labs will decide whether to extend, replace or update the plan for the next period.

9. Document control and approval

Document title	AAI Labs Gender Equality Plan 2026-2035
Organisation	UAB Taikomasis dirbtinis intelektas (AAI Labs)
Version	4.1
Status	Approved
Approved by	Dr. Aistis Raudys, Founder and Chief Executive Officer
Date of adoption	13 August 2026
Period covered	13 August 2026 to 31 December 2035
Plan owner	Chief Executive Officer
Coordination	CEO or designated responsible person, as needed
Resourcing	Existing working time and expertise; additional resources where needed or required
Monitoring	One concise annual monitoring note based on available indicators
Training / awareness	At least one proportionate action recorded annually
Publication	Published on the AAI Labs website
Formal GEP update	Only where materially required or useful; otherwise remains in force through 2035

Signed for and on behalf of UAB Taikomasis dirbtinis intelektas (AAI Labs):

Dr. Aistis Raudys
Founder and Chief Executive Officer
Date: 13 August 2026

Appendix A. Annual GEP monitoring note template

This template is intentionally short. It can be completed once per calendar year and retained internally as the annual monitoring/reporting record under this plan.

nnual check	Status / value	Comment / action if needed
ear and reviewer	Year: _____ Reviewer: _____	
urrent approved GEP remains published on website	Yes / No	
orkforce composition by sex reviewed	Yes / No	Headcount: Women ___ Men ___ Other/not recorded ___

nnual check	Status / value	Comment / action if needed
ecruitment data reviewed, if recruitment occurred	Yes / No / N/A	
omotion / career-progression data reviewed, if applicable	Yes / No / N/A	
y/remuneration patterns reviewed where meaningful	Yes / No / N/A	
eadership / project leadership composition reviewed	Yes / No / N/A	
eported discrimination / harassment / gender-based violence cases	Number: ____	Aggregate only; confidential details kept separately if needed.
&I gender dimension considered in relevant proposals/projects	Yes / No / N/A	
nnual awareness / training action completed	Yes / No	Form/date: _____
aterial gender-equality issue identified	Yes / No	
orrective or follow-up action required	None / Yes	If yes: _____
EP document itself needs amendment	No / Yes	If yes: _____
EO acknowledgement	Date: _____	Signature/initials: _____

10. References

1. European Commission / European Research Executive Agency, Gender in EU research and innovation - Gender Equality Plans (Horizon Europe process-related requirements and recommended thematic areas).
2. EU Funding & Tenders Portal, Horizon Europe FAQs and Programme Guide provisions on the GEP eligibility criterion.
3. European Institute for Gender Equality (EIGE), Gender Equality in Academia and Research (GEAR) resources.
4. Labour Code of the Republic of Lithuania.
5. Law on Equal Opportunities for Women and Men of the Republic of Lithuania.
6. Law on Equal Treatment of the Republic of Lithuania.
7. Regulation (EU) 2016/679 (General Data Protection Regulation).
8. Regulation (EU) 2024/1689 (Artificial Intelligence Act).