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# DIVERSITY AND INCLUSION POLICY

| POLICY INFORMATION SHEET | |
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| **Title** | Diversity and Inclusion Policy<br>(the "**Policy**") |
| **Policy Code** | EIT Food_POL_03_DIVERSITY AND INCLUSION POLICY |
| **Document Language** | English |
| **Responsible Department** | HR Department |
| **Date last update** | 01 August 2026 |
| **Reviewed by** | Legal |
| **Scope** | This policy applies to all members of the EIT Food community, including its partners, suppliers, subcontractors, subgrantees and clients, regardless of contract type. |
| **Applicability** | This Policy applies to all activities and operations undertaken by EIT Food |
| **Mandatory Review** | 01 August 2028 |

## REVISION

The Policy is subject to revision at least once every two (2) years. Such revision is coordinated through and authorised by the HR Department. Upon sign-off by the HR Department, the revised Policy is forwarded to the DEI Officer and the Management Team for approval. Publication of the approved Policy is coordinated by the HR Department and the Communication Department.

Users are requested to refer to the latest version of the Policy. The section Revision Highlights below provides an overview of the latest Policy updates.

## REVISION HIGHLIGHTS

These highlights provide only an overview of the Policy revisions. The latest version of the Policy should be consulted for changes and/or more detailed information.

**Revision and Issue History**

| Date | Revision | Author | Description |
|---|---|---|---|
| 01.07.2022 | 1.0 | HR Department Aleksandra Nizynska | First version |
| 01.08.2026 | 2.0 | Legal | Second Version |
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# 1 PURPOSE

Diversity and Inclusion is a prerequisite to innovation and a fundamental value of EIT Food as part of the European Institute of Innovation and Technology (EIT) Community. EIT Food, as part of the European innovation scheme, aims to provide equal opportunities through mainstreaming processes, co-develop innovations that are relevant to all, and leave a long-lasting societal impact.

At EIT Food, Diversity and Inclusion is not a simple reporting exercise but a core element of how the workplace is organised and projects are delivered. Since 2020, a grass-roots group entitled "Equity, Diversity and Inclusion" has been operating, gathering employees from different CLCs and Functional Areas who are committed to promoting diversity and inclusion within and outside EIT Food.

EIT Food equips its organisation with a variety of viewpoints and perspectives to better understand and meet the needs of diverse groups of participants in its programmes, and to take into account the necessities of different consumers while designing innovations in the agrifood sector. EIT Food recognises that it can only benefit from recruiting a diverse workforce by ensuring that all employees feel included and valued enough to contribute. EIT Food believes that every employee deserves the opportunity to work in a safe, supportive and inclusive environment where they can achieve their full potential. The core values of the Gender Mainstreaming Policy, co-created with employees in 2021, align with and reinforce the principles of Diversity and Inclusion. They are based on the following principles:

- Recognizing the strengths of all
- Making things and activities accessible for all
- Caring for all

Therefore, the company encourages all its members of staff to address issues that might be inhibiting the realisation of these values in the workplace.

# 2 SCOPE

This policy applies to all members of the EIT Food community, including its partners, suppliers, subcontractors, subgrantees and clients.

Furthermore, this policy applies to all processes relating to employment and training and to any dealings with partners and clients. It is important to acknowledge that any decisions relating to partners and clients will be based on business-related criteria only and any irrelevant information will not form part of the process.

All employees are responsible for the promotion and advancement of this policy.

Behaviour, actions or words that transgress the policy will not be tolerated and will be dealt with in accordance with EIT Food's disciplinary procedure. Managers have a duty to implement this Policy and to make every effort to ensure that a diverse and inclusive culture is fostered and maintained at EIT Food.

## 3 DEFINITIONS

EIT Food will not discriminate on grounds such as:

- sex or gender reassignment
- race
- colour
- ethnic or social origin
- sexual orientation
- genetic features
- language
- religion or belief
- political or any other opinion
- membership of a national minority
- family status
- pregnancy and maternity
- disability
- age
- or any other irrelevant factor

Instead, EIT Food will build a culture that values meritocracy, openness, fairness and transparency. Beliefs, backgrounds, talents, capabilities, and ways of life—inclusion aims to leverage them to facilitate an environment of involvement, respect and connection, and ultimately, create business value for EIT Food.

**DEFINITIONS**
For the purposes of this Policy, the following definitions apply:

**Diversity** means the range of differences among individuals, including but not limited to differences in race, ethnicity, gender, age, disability, sexual orientation, religion, nationality, socio-economic background, and cognitive style.

**Inclusion** means creating an environment in which all individuals are treated fairly and respectfully, have equal access to opportunities and resources, and can contribute fully to the organisation's success.

**Discrimination** means any less favourable treatment of an individual on the basis of one or more of the protected characteristics listed in this Policy, whether direct or indirect.

**Harassment** means unwanted conduct related to a protected characteristic which has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment.

**Reasonable Adjustments** means modifications or accommodations made to the working environment or practices to ensure that individuals with disabilities are not placed at a substantial disadvantage compared with individuals who are not disabled.

**Victimisation** means subjecting an individual to a detriment because they have made, or intend to make, a complaint or allegation relating to discrimination or harassment, or have supported someone else in doing so.

# 4 PROCESS

## 4.1 Raising concerns

Any issues regarding the Diversity and Inclusion may be raised informally by talking to the Line Manager. In case this is not a preferred or most efficient way of assessing the issue, you can address your concern towards the HR Director. If necessary, the concern can be raised towards the Legal Counsel. For contact details see Annex 1.

Formal performance management meetings, as well as any informal discussion with the line manager should be a forum where employees can openly discuss any issues they have around fairness, transparency, and equality of opportunity. These sessions are furthermore opportunities for line managers to ensure employees understand how they contribute to the business.

All concerns raised under this Policy will be treated in confidence to the extent possible, consistent with the need to conduct a fair and thorough investigation. EIT Food will not disclose the identity of the complainant without their prior consent, unless required by law or necessary to progress the investigation.

No employee will suffer any form of retaliation or detriment for raising a concern in good faith under this Policy, for supporting a colleague in raising a concern, or for participating in any investigation. Any retaliatory conduct will itself constitute a disciplinary offence.

## 4.2 Assessing Diversity and Inclusion

EIT Food will regularly conduct a participatory discovery session with employees, aimed at assessing to what extent employees feel included, what measures they perceive as helpful and which as hindering. They will also have the opportunity to offer suggestions as to further adaptions they feel would support diversity and inclusion at EIT Food.

EIT Food will collect anonymised diversity data on an annual basis and report to the

Management Team on diversity metrics, including workforce composition, recruitment trends, promotion rates, and employee satisfaction by demographic group. This data will be used to identify areas for improvement and to measure progress against diversity targets.

## 4.3 Advancing and Ensuring Diversity and Inclusion

EIT Food understands that Diversity and Inclusion is much more than a written policy and that it must be embedded in day-to-day business operations and reflected in all HR policies and practices. EIT Food particularly commits to the following:

- **Recruitment**: Ensure it targets candidates whose personal values match those of EIT Food. This should include training for hiring managers in the field of equal opportunities and employment law as well as the interviewing skills needed to identify candidates who are likely to feel included in your organisation. EIT Food will also write job descriptions and adverts in a way that motivates qualified individuals from all types of background to apply. All recruitment related documents and descriptions will be written in a gender-inclusive language.

- **On-boarding**: EIT Food will ensure all new hires fully understand and support its approach to Diversity and Inclusion.

- **Communication**: EIT Food will regularly share details of its operational performance and plans for the future with employees. To ensure employees are included in the direction of the business and in the decisions that underpin the organisation, regular All Hands meetings will be continued, during which employees can meet and question Management Board and the CEO.

- **Management**: EIT Food acknowledges that Managers are role models within the company and are important advocates for Diversity and Inclusion. Therefore, Managers will create awareness in their team to always act in an inclusive way. Communication will be refreshed regularly by HR to keep the Policy alive.

- **Promotion and Succession planning**: By actively promoting and advocating internal vacancies EIT Food will look to encourage internal applications from any member of staff with the required competencies and experiences, independently from any irrelevant criteria as listed above.

- **Exit interviews:** EIT Food will use the opportunity of exit interviews to understand whether leavers have felt excluded or held back in any way.

- **Development**: EIT Food will provide e-learning modules for diversity and inclusion awareness trainings at the online learning platform, which will be shared with all members of staff. Further development interventions, either on team or individual

level as required, will ensure that all members of staff are equipped with the right mindset, toolset and skill set to be effective in their role.

- Reasonable Adjustments: EIT Food is committed to making reasonable adjustments for employees and candidates with disabilities to ensure they are not placed at a substantial disadvantage in the workplace. Employees who require adjustments should discuss their needs with their line manager or the HR Department, who will assess and implement appropriate measures in a timely manner.

- Mandatory Training: All employees are required to complete Diversity and Inclusion awareness training within three (3) months of joining EIT Food and to undertake a refresher course annually thereafter. Managers are additionally required to complete training on inclusive leadership and handling D&I concerns. Completion rates will be monitored by the HR Department.

- Third-Party Compliance: All partners, suppliers, subcontractors, and subgrantees are required to acknowledge and adhere to the principles of this Policy as a condition of engagement with EIT Food. EIT Food will include appropriate diversity and inclusion obligations in its contractual arrangements with third parties and will periodically review third-party compliance.

## 5 PROCESSES AND ACTION PLAN

Members of the EIT Food community are representatives of various countries, cultures, and ethnicities. It is important to celebrate this diversity as well as ensure inclusiveness within the organization. EIT Food is committed to operationalising this Policy through a co-creation process with employees to develop and maintain a Diversity and Inclusion Action Plan.
This process is one of the following specific actions that EIT Food is committing to in order to advocate and ensure Diversity and Inclusion:

- **Equal pay**

EIT Food is committed to equal pay for equal work and is following the equal remuneration principle regardless of the characteristics that are not relevant for the job performance stated in the Definitions of the Diversity and Inclusion Policy.

- **Diversity and Inclusion Officer**

In July 2022 an expert role of Diversity and Inclusion Officer was formed within the EIT Food structure. D&I Officer is supporting the implementation of all policies related to equal treatment such as Gender Mainstreaming Policy and Diversity and Inclusion Policy.

- **Gender Mainstreaming Policy and Gender Action Plan**

Both documents were co-created together with EIT Food employees in the participatory policy design process and are in place since the end of 2021. The Gender Mainstreaming Policy is

publicly available on EIT Food website: https://www.eitfood.eu/reports/gender-policy. GMP and GAP implementation will be monitored and evaluated regularly.

- **EDI exchange window**

The informal group of employees interested in diversity and inclusion will continue to operate with monthly meetings being held to discuss most pressing topics around D&I within the organization as well as external experts input to inspire actions in the field of inclusive food systems and inclusive workplace.

- **Diversity and Inclusion Action Plan Co-Creation Process**

A participatory design process of the Diversity and Inclusion Action Plan will be launched with the organization to define the most pressing issues around D&I for the employees and co-create the solutions. Employees will be able to provide their insights and share experiences on how to improve the situation of various groups of employees within the organisation. Based on that process the Diversity and Inclusion Action Plan will be developed.

EIT Food conducts a participatory design process for the Diversity and Inclusion Action Plan to define the most pressing D&I issues for employees and co-create solutions. Employees are encouraged to provide their insights and share experiences on how to improve the situation of various groups within the organisation. The Diversity and Inclusion Action Plan is reviewed and updated annually based on this process.

# 6 NON-COMPLIANCE

All employees, managers, partners, suppliers, subcontractors, subgrantees, and other members of the EIT Food community are required to comply with this Policy. A failure to comply with this Policy, whether through acts of discrimination, harassment, victimisation, or any other conduct that is inconsistent with the principles set out in this Policy, may result in disciplinary action. In the case of employees, such disciplinary action may include, depending on the seriousness of the breach, a formal warning, suspension, or termination of employment in accordance with EIT Food's disciplinary procedure. In the case of partners, suppliers, subcontractors, subgrantees, or other third parties, non-compliance may result in the suspension or termination of the relevant contractual or business relationship with EIT Food. EIT Food may also take such further action as it considers appropriate, including reporting matters to the relevant authorities where required by applicable law. All employees are encouraged to report suspected breaches of this Policy in accordance with the procedures set out in the Raising Concerns section of this Policy, and no individual will suffer any detriment for making a report in good faith.

## ANNEX 1 – CONTACT DETAILS

**HR Director**
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