



MINERVA
ANALYTICS



**Diversity Dilemmas: Shareholders Steadfast
Amid Pervasive Political Posturing**

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Table of Contents

Introduction	3
Shareholders and Diversity	4
Escalating Anti-Diversity Efforts.....	4
2025 Peak Season.....	4
Pro-DEI Proposals:.....	5
Anti-DEI Proposals:.....	5
Notable Anti-ESG Proponents:	6
Notable Votes in H2 2025	6
Going Forward - 2026.....	7
DEI: Arguments For and Against	8
The Benefits of DEI	8
The Anti-DEI Arguments	9
Minerva Analytics' Perspective on Investing and Diversity	10
Global DEI Regulations	11
Minerva Analytics' Stance on Female Board Representation	11
The EU Regulations	12
Case Studies	14
Looking Ahead.....	16

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Introduction

1.5%

Average votes in favour of proposals opposing diversity in H1 2025. Despite rising rhetoric around the topic, these resolutions consistently struggle to secure meaningful shareholder support.



US policymakers and right-leaning investors tried to denigrate DEI practices and programmes during 2025. Such efforts are expected to continue, or even increase, in 2026.

3000+

Of the companies Minerva reports on meet the recommended 30% female Board representation. Eighty percent or more of Canadian and UK companies meet this recommendation, while just 21% of Japanese firms do.



Many still see strong business benefits in DEI, including higher profitability, improved recruitment and retention outcomes and better perceptions from consumers and other stakeholders.



While the US has become increasingly hostile towards diversity, it is becoming much more established globally. Board gender diversity is particularly set to become further entrenched by the EU Gender Balance Directive in June 2026.

Diversity, equity and inclusion (DEI) has become one of corporate governance's most contested areas. While many countries around the world have moved to advance DEI both in boardrooms and within corporate workforces, some have been slow to act, and others have actively railed against DEI initiatives or regulations.

DEI initiatives can take several forms, such as hiring quotas, pay-gap reporting, parental leave, training and education. The most common form of DEI initiative are 'pipeline' programmes, aimed at facilitating the hiring and career progression of underrepresented minority groups to improve their representation within organisations. Such programmes are especially common in STEM fields, which typically have lower rates of minority representation. The common theme across these initiatives is to expand opportunities and access for underrepresented groups such as women, people of colour, people with disabilities, and LGBTQIA+ peoples.

Shareholder proposals on diversity are much more common in the US compared to other regions. This can be because DEI is less controversial or contested in other jurisdictions and that the topic is more integrated into corporate culture and viewed as a 'norm'. There is also significant divergence between the US and other markets on rules and regulations relating to certain elements of diversity, notably on gender diversity at board level. This is detailed in case studies of six countries – on the US, Canada, Germany, Japan, Norway and the UK – which showcase gender diversity differences.

This briefing breaks down some notable DEI-related shareholder proposals during 2025, as well as spotlighting emerging trends which could prove prevalent during 2026. This briefing discusses the expanding anti-ESG movement, which has become particularly prominent in the US following the re-election of Donald Trump for a second term as President. Against this political backdrop, there has been continued pressure from 'anti-woke' investors urging companies to reduce or eliminate their corporate diversity initiatives. Despite this, as shown in Minerva's [Shareholder Proposal Voting Trends Briefing](#), shareholders continue to support DEI at AGMs, with anti-DEI proposals receiving very low rates of support.

Shareholders and Diversity

Escalating Anti-Diversity Efforts

Campaigns against diversity-related programmes and policies rapidly accelerated during 2025, a trend catalysed by Trump's second term as President. The US is the region responsible for by far the greatest level of activity opposing DEI, as can be clearly seen by the vast majority of notable shareholder proposals against diversity being filed by US-based proponents and US-based companies.

Focus on DEI from politicians and policymakers looks set to remain prevalent, or even increase, during 2026 with US states such as Texas and the [US Department of Justice](#) (DOJ) under the Trump administration launched fresh attacks on diversity within the first few weeks of the new year.

Despite the rising rhetoric around the topic of diversity from politicians and some shareholders, investor appetite for an overhaul of DEI appears muted. Anti-DEI shareholder proposals that were voted on at AGMs in 2025 failed to secure meaningful support, being comfortably outperformed by pro-diversity resolutions. Shareholders at-large seemingly still appreciate the numerous advantages and benefits that DEI offers, which will be further detailed below.

In contrast to the US, DEI is widely accepted as standard corporate practice across EU countries, with regulations actively supporting such initiatives. For example, the EU Directive on Gender Balance on Corporate Boards mandates that, by June 2026, companies must ensure at least 40% of their non-executive board members are women. As DEI is both embedded in law and broadly embraced within European corporate culture, resolutions on DEI matters are uncommon at AGMs, reflecting the fact that the issue does not spark the same level of debate as it does in the US.

The Trump administration has also looked to put pressure on companies to pull back on their DEI practices. This has proved successful at some firms, such as Amazon, Disney, Meta, [Rolls Royce](#) and Target, though others like [Apple](#) and [Costco](#) has stayed strong. Goldman Sachs this month [reportedly joined](#) the list of companies stepping back on diversity following lobbying from the National Legal and Policy Center. There have also been some high-profile alleged cases of bias against white workers, with one such case [against Starbucks being dismissed](#) this month, while the US Equal Employment Opportunity Commission has [escalated pressure against Nike](#) in another the outcome of which could set a precedent going forward. In addition, shareholders consisting of four New York City public pension funds are [suing AT&T](#) for excluding a shareholder proposal which aimed to increase DEI disclosures, highlighting growing legal uncertainty after the SEC's [controversial overhaul of its 'no action' request process](#) allowing resolutions to be excluded without Commission assent.

2025 Peak Season

While diversity-related resolutions were present in previous proxy seasons, the 2025 season saw significant shifts in the number of both pro and anti-DEI proposals. During the first five months of 2025 there were in fact more anti-DEI than pro-DEI shareholder proposals, as [shown by Minerva Analytics' research](#). Anti-DEI proposals increased to 16 during January to May 2025, up from 13 during the same period in 2024. Also within this timeframe, pro-DEI proposals fell from 17 to 13, with pro-ESG proposals edging down from 13 to 12. It remains to be seen whether these trends will persist into the 2026 proxy season, particularly considering the SEC's 'no action' request stance shift.

The Minerva briefing found that 5% of all sustainability proposals filed during this time were related to DEI, while 32% of anti-ESG proposals focused on DEI. It also demonstrated differences in the narratives of these resolutions and the intention behind DEI proposals. Despite the ever-rising rhetoric, anti-DEI shareholder resolutions enjoyed minimal success during the 2025 proxy season.

Between January and June 2025 anti-DEI resolutions averaged a meagre 1.5% of votes in favour, below even the 2% average support that anti-ESG proposals received. Conversely, pro-DEI proposals averaged 12% of votes in favour.

Some key examples of pro- and anti-DEI proposals during this period which all received 'vote against' recommendations, almost all of which were from US proponents and at US companies, are detailed below:

Pro-DEI Proposals:

Kansai Electric Power Company

Proposal: *'To add to Articles a provision to eliminate gender discrimination and promote equality'*

The proposal received 8% votes in favour and shows the movement – albeit slow – towards promotion gender equality in Japan, a country that generally lags behind its peers in terms of gender equality. Japan ranks fifth in terms of GDP globally, yet ranked 118 out of 148 countries in 2025 in [gender gap reporting](#). Thus, a proposal of this nature is unlikely to see high rates of success, due to the barriers women and minority groups face in Japan, although efforts are being undertaken to increase representation within the country. However, the fact that this proposal has been filed at this company on an annual basis since 2022 demonstrates that some shareholders are at the very least aware of the ongoing movements in favour of DEI efforts and the potential benefits to be reaped from increasing female representation within the company.

International Paper

Proposal: *'To request the Board to report on the Company's LGBTQIA+ equity and inclusion efforts'*

This proposal from the Comptroller of New York demonstrates that DEI proposals are expanding from the previous attempts to increase female representation to include LGBTQIA+ peoples as well as other underrepresented minority groups. While this proposal only received 7% votes in favour, resolutions like this demonstrate that there are attempts to expand DEI programmes beyond the traditional focus of female representation, to include other minority groups. This trend has likely occurred as the gender representation gap in US companies has narrowed, leaving shareholders to push for improving the representation of other underprivileged groups.

Anti-DEI Proposals:

American Express Co

Proposal: *'To request the Board revisit incentive guidelines for executive pay to identify and consider eliminating discriminatory DEI goals from compensation inducements'*

This resolution was filed by the proponent the National Legal and Policy Center. It moved away from the typical focus on DEI policies, either stripping back DEI initiatives or reports investigating the risks of such policies. It instead requested that the company remove remuneration metrics that are based on DEI goals. Received only 1% of votes in favour, this proposal shows that investors continue to value DEI programmes and do not support the removal of diversity-related metrics within compensation programmes for executives and Board directors.

Caterpillar Inc

Proposal: *'To request that the company consider abolishing its DEI policies, department and goals'*

This proposal from noted anti-ESG proponent the National Center for Public Policy Research received just 3% of votes in favour. DEI is a focal point for anti-ESG proponents, with 32% of all anti-ESG resolutions in H1 2025 being anti-DEI proposals. While some simply request for companies to publish reports exploring potential risks associated with DEI incentives and programmes, others, such as this one at Caterpillar Inc requested the company to scrap its DEI strategies altogether. NCPPR also filed similar proposals at many other companies.

Notable Anti-ESG Proponents:

There are several proponents who frequently file anti-ESG proposals at AGMs, particularly in the US. Most of these proponents are right-wing, conservative organisations or think-tanks, often possessing religious ideologies and a noted opposition to 'wokeism' and thus DEI, which they believe is based on illegal discriminatory ideals.

These organisations include:

The National Center for Public Policy Research

A major US conservative think-tank, they uphold ideals of free-market individualism and non-interference. In particular, they have noted that DEI policies are 'overtly bigoted' and their Free Enterprise Project describes itself as the opponent of 'the woke takeover of American corporate life and defender of true capitalism'.

National Legal and Policy Center

A right-wing conservative think-tank and lobbying group. They have links to opposing DEI initiatives, believing that such programmes go against meritocratic structures and discriminate against protected characteristics.

Bowyer Research

An organisation that provides analysis and insights on the intersection of faith, economics, and politics. It focuses on guiding investors and corporations in making decisions aligned with traditional Christian and right-wing conservative values, often opposing progressive or ESG-related initiatives. They advocate for policies that promote free markets and conservative economic principles and have described themselves as 'ESG sceptic'.

The Bahnsen Family Trust

Led by David Bahnsen who sits on the advisory Board of the 'Viewpoint Diversity Score' which aims to negatively rate companies that include social justice concerns (for example, racial equity). The index is also a project of the anti-LGBTQ+ group 'Alliance Defending Freedom'.

Notable Votes in H2 2025

In the latter half of 2025 and the beginning of 2026, only a few proposals related to DEI were filed, all at US companies, all of which came from anti-ESG proponents.

This included proposals at:

Cisco Systems	To request the board to evaluate inclusion programs and their financial impacts.
Paramount Skydance Corp	To request the Company to issue a public report detailing the potential risks associated with omitting "viewpoint" and "ideology" from its written equal employment opportunity policy.
Intuit Inc	To request the board to report on the return on investment of the company's diversity and inclusion programmes.
Visa Inc	To request the Board to conduct an inclusion return on investment audit.

All these resolutions were filed by the NCPPR. Those that have already been voted on received an average of just 0.8% votes in favour. Visa Inc's AGM took place on 27 January 2026, and Intuit Inc's on 22 January 2026.

Despite the US Federal Government pursuing anti-DEI policies and anti-ESG proponents pressuring companies to align with the Trump administration's direction of travel, anti-DEI proposals continue to receive low rates of votes in favour, demonstrating that shareholders may not be accepting of such anti-ESG beliefs.

Going Forward - 2026

As we look toward the upcoming 2026 proxy season, we can expect several changes to the frequency and nature of DEI proposals, particularly in US markets. While DEI looks likely to remain a prevalent topic this year, recent regulatory changes will impact the ability of investors to file these resolutions.

The US Securities and Exchange Commission (SEC) controversially announced in November that it would not respond to company 'no action' requests, meaning that companies can block shareholders filing proposals without approval from the SEC. This leaves shareholders with little recourse if their resolutions are blocked by the company and could mean that they are compelled to turn to litigation to have their concerns on DEI and other issues addressed. Not only does this mean increased market uncertainty, but it also means that corporate accountability may decrease.

This also leaves companies on less certain footing, as excluding shareholder proposals with approval from the SEC could risk triggering legal action from investors. This was showcased by Disney's 2026 proxy statement, which included three proposals which it had filed 'no action' requests against. One of these resolutions filed by Bowyer Research on the behalf of an individual shareholder which was related to supporting the "religious freedom" of Disney's employees.

Adding to the uncertainty in the market the Trump administration has announced a new interpretation of the False Claims Act which opens DEI initiatives to potential fraud investigations by the Department of Justice. This may push many companies to continue rolling back their DEI programmes in 2026.

Last month, Texas Attorney General Ken Paxton declared DEI-related policies across Texas to be unconstitutional, highlighting more than 100 statutes he claimed violated the US Constitution's Equal Protection Clause and Texas' Constitution's Equal Rights Amendment, as reported by [Minerva Analytics](#).

In doing so, he argued that state programmes aiming to use race or gender in talent acquisition policies – such as the Historically Underutilised Business and Disadvantaged Business Enterprise programmes – were unlawful discrimination, also warning companies about potential fines or litigation if they retained DEI benchmarks. This can demonstrate the impact of anti-'woke' sentiment on the political and corporate environment, with the Attorney General claiming such DEI practices as "woke, race-based favoritism."

However, despite these changes some investors may well double-down on their efforts to promote DEI. Some companies in the US have stood their ground on ESG and DEI in the face of the Administration's attempt to sideline diversity programmes. For example, Costco have maintained their policies on diversity and inclusion, to the point of the CEO receiving a letter from nearly 20 Republican Attorney Generals claiming that such actions violate federal law. While attempts to file pro-DEI resolutions may be blocked, or successfully filed resolutions may fail to pass at AGMs, shareholders are likely to continue to focus on DEI where possible.

DEI: Arguments For and Against

The Benefits of DEI

Share Value

It is widely recognised that DEI initiatives and minority representation within companies are positively correlated with higher share value. McKinsey's study [Diversity Wins](#) notes that companies with higher rates of female executive representation are 25% more likely to have above-average profitability than those with lower rates of representation. Further, a [study by the London School of Economics](#) found that comprehensive DEI programmes are linked to increased long-term performance and growth for companies within the US and the UK.

Representation

By providing initiatives to boost the representation of typically underrepresented groups and communities, companies can enhance their talent acquisition. DEI programmes can expand the available talent pool, provide opportunities for minority groups to enter the workforce in roles that may have previously had increased barriers for them – for example, institutional barriers that have historically limited women's opportunities from employment in STEM-related industries. They can also meet the expectations of applicants who value workplace initiatives promoting diversity and inclusion. For example, a [LinkedIn survey](#) found that 80% of respondents would prefer to work for companies that actively value DEI issues and found that job listings that mentioned DEI efforts received over 25% more applications from women than those that didn't.

Retention

A [study by Boston Consulting Group](#) has demonstrated that workplaces with DEI initiatives can boost employee retention, noting that employees who feel included and represented in the workplace are 2.4 times less likely to quit than those with limited levels of representation and inclusion. Companies with higher rates of diversity in their senior leadership had around 85% of employees reporting feelings of belonging, thus increasing talent retention.

Reputation

DEI is generally well-perceived by consumers, with companies possessing comprehensive DEI initiatives often receive positive reputational benefits. A [study by Axios](#) showed that companies that maintained their DEI programmes during 2025, such as Patagonia and Microsoft, benefitted from higher reputational scores than those that stripped back their initiatives.

Target Corp Inc

In January 2025, Target Corp announced that it would roll back its DEI programmes and initiatives. The company had previously been vocal about its support for ethnic minority communities; in 2021, the Chairman and CEO had pledged to boost the representation of Black employees by 20% and to spend US\$2 billion with Black-owned business by 2025, as well as announcing an initiative to promote and support Black entrepreneurs. Following this, the company's sales grew by more than 12% and its market-value reached U\$129 billion. While other factors may be at play here, it has been noted that the pro-DEI approach had a positive influence on corporate success.

Following its announcement to roll back its DEI programmes, more than 200,000 consumers signed a 'fast' to essentially boycott shopping at Target stores, with nationwide visitors falling by more than 6%. Further, between January and March 2025, the company's share value dropped by 24%. Its current market value is just U\$45 billion, a 65% fall from its 2021 value. While other factors may be involved, this can demonstrate the link between DEI, company reputation, share value and consumer behaviour.

Alignment with International Standards and Regulations

Since international bodies generally recommend that companies employ some form of DEI policy, companies that follow such principles align themselves with global standards of good practice. Ensuring that minority groups have increased opportunities for representation can not only reap reputational and financial rewards for companies but can also decrease the likelihood of litigation, particularly in markets and on exchanges that enforce diversity criteria or quotas.

The Anti-DEI Arguments

Political Backlash

Since 2020, opposition to 'wokeness' – generally summarised as movements favouring social justice concerns – has been on the rise. This 'anti-woke' movement has been particularly prevalent in the US but has also manifested in European politics. Now, some businesses are seeing increased calls from certain shareholders, consumers and other key stakeholders to distance themselves from 'woke' identity politics – including DEI programmes.

While some companies, such as Constellation Brands Inc and UnitedHealth Group, have retained some form of DEI programme, they have rebranded this as 'inclusive culture' or 'culture of belonging', respectively, to avoid political backlash. Other companies have taken more overt stances to remove their DEI initiatives altogether because of this anti-woke sentiment. For example, Amazon has stripped back its DEI programmes and removed gender-affirming healthcare for transgender employees from their workplace benefits, Google's parent company Alphabet Inc has removed its initiatives aiming to increase workplace representation for minority communities and Meta Platforms has rescinded its diversity hiring goals and axed their DEI policies and programmes.

Blanket statements around DEI can also impact consumers' perceptions. While many consumers continue to recognise the benefits of DEI programmes, the growing anti-'woke' rhetoric means that DEI is seen as an extreme ideological position rather than being rooted in equality and providing benefits for companies. Common misconceptions include that DEI works to exclude overrepresented groups such as straight, white males, rather than working to promote the representation of underserved communities. Further, some believe that DEI undermines considerations of a meritocratic workplace by hiring underqualified individuals to fulfil diversity quotas. Although these statements are not correct, they can impact public thinking and act as a factor in movements away from DEI and similar 'woke' policies.

Legal Ramifications

In 2023, [the US Supreme Court](#) ruled that colleges and higher education centres that utilise affirmative action initiatives may be in breach of the equality provision of the [14th Amendment Clause](#). Many companies and investors have transposed this ruling onto DEI initiatives out of concern that job applicants or employees may raise cases of litigation against the company citing discrimination or preferential treatment for those who benefit from DEI programmes.

The Trump administration passed an Executive Order titled '*Ending Radical And Wasteful Government DEI Programs And Preferencing*' in January 2025 terminating federal DEI programmes, positions and mandates, resulting in hundreds of layoffs for federal employees. This also reversed the 1965 Equal Employment Order which required federal contractors to maintain affirmative action programmes. This order was later amended in 2014 to include sexuality and gender identity as protected groups under such programmes.

The 2025 reversal of this order prohibited contractors from considering protected characteristics such as gender, religion, or race and required contractors to prove that they do not operate any DEI initiatives. They were also required to certify their termination of any policies that resemble affirmative action or DEI requirements. While this Executive Order applies only to federal organisations and contractors, its impact has had ramifications for the US and beyond as companies rush to align themselves with the current political atmosphere.

Further potential complications for US companies include a [memo](#) in which the US Attorney General stated their intent to investigate any American firm that retained its DEI policies.

Stop WOKE Act

In 2022, Florida passed the Stop WOKE Act, which restricts workplace DEI programmes and training initiatives. Under this ruling, employers that utilise educational policies on the inequalities surrounding gender, sex, race, or sexual orientation may be held liable for 'discrimination'. Companies found in breach of this law could be required to pay compensatory or punitive damages of up to U\$100,000, as well as fines from civil action lawsuits.

While this law doesn't prohibit workplace DEI programmes, it limits the opportunities for employers to educate workers on diverse groups within society. Any training given is required to be voluntary and 'objective' without endorsing DEI, and employers must make it clear to employees that they are not required to believe any of the concepts listed. Although this ruling technically still allows for DEI training in the workplace, many employers in Florida stripped back their initiatives immediately after the passing of this law, due to the potential repercussions associated with violating this act.

In 2024, a federal court found that the law could not be applied to businesses and companies without violating the First Amendment, as it attempted to limit certain viewpoints within the workplace. However, the lasting impact of the law on DEI training within a corporate setting remains, with many companies continuing to limit the scope of their DEI programmes, if retaining such policies at all.

It is worth noting that these legal and regulatory concerns primarily affect US companies. Other jurisdictions, such as the UK, generally accept that DEI initiatives are not in breach of their respective equality laws, such as the 2010 Equality Act. While US companies operating in other jurisdictions such as Europe received warnings in March 2025 to comply with the stripping back of DEI programmes as seen in the US, the EU has made consistent efforts to double-down on promoting DEI.

Minerva Analytics' Perspective on Investing and Diversity

Minerva Analytics remains committed to providing investors with independent, objective, and choice-driven proxy voting solutions, something which we emphasised in a statement issued ahead of the 2025 peak proxy season. At Minerva, we recognise that DEI considerations are important aspects of corporate governance for many investors, while others may prioritise different criteria when evaluating board effectiveness. Our approach remains client-centric, ensuring that our research and recommendations reflect the diverse needs and preferences of investors rather than imposing a one-size-fits-all framework.

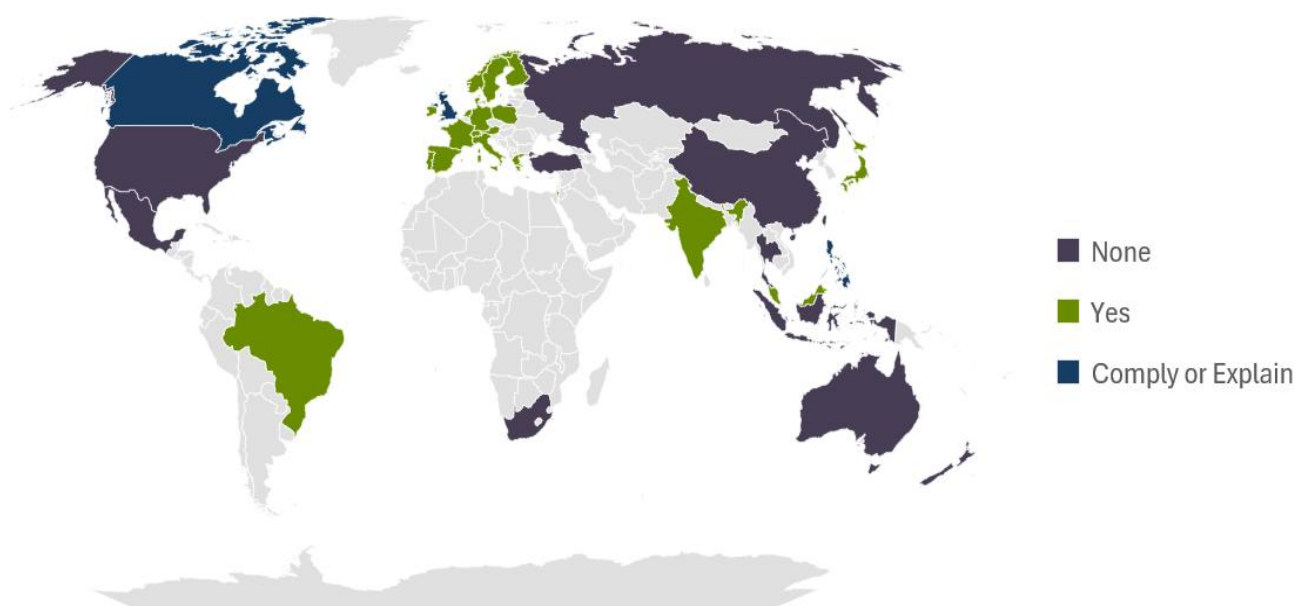
We continue to provide customisable proxy voting guidelines that enable investors to align their voting decisions with their own governance and sustainability policies. Our research framework allows for granular customisation, offering investors the ability to consider DEI where they see fit, while maintaining a neutral stance on mandated inclusion. We believe that a robust, well-functioning market benefits from transparency, data-driven insights, and respect for differing viewpoints on corporate governance matters.

Global DEI Regulations

Different countries' company laws set different requirements, particularly concerning the representation of women on company Boards. Many countries have some form of quota regarding female representation on their Boards; typically to ensure at least one female director sits on the Board. Others may utilise a comply or explain model, under which companies are expected to meet certain quotas or explain why they have chosen not to meet said quotas. Some argue that such models do not go far enough, as companies can simply 'explain' their way out of meeting the 30% threshold. There are several notable countries with no such gender diversity rules, including the US, Australia and China.

Of all the companies that Minerva reports on globally, there are currently 3,178 with at least 30% female Board members. Figure 1 below shows the countries covered by Minerva's reporting and whether they have any specific Company Law requirements for female Board representation.

Figure 1: Female Board Representation Requirements in Minerva-covered Jurisdictions



Minerva Analytics' Stance on Female Board Representation

Minerva considers 30% female representation on company boards to generally be good practice, as well as companies having at least one director from an ethnic minority or underrepresented racial group. This minimum proportion ensures women's voices are genuinely represented and supports lasting gender parity in the workplace. The figure of 30% representation is largely supported by international organisations such as the World Economic Forum and the 30% Club.

As shown in Table 1 overleaf, the only countries outside of the EU reported on by Minerva that currently have such requirements are Brazil and Switzerland. Very few countries have strict requirements for 30% female representation on their Boards, while even fewer mandate the representation of minority ethnic groups.

Table 1: Female Board Representation Rules (Excluding EU)

Country	Does Company Law require minimum 30% Board female representation?*
Australia	No
Brazil	Yes
Canada	No
China	No
Hong Kong	No
India	No
Indonesia	No
Israel	No
Japan	No
Malaysia	No
Mexico	No
New Zealand	No
Philippines	No
Russia	No
Singapore	No
South Africa	No
South Korea	No
Switzerland	Yes
Taiwan	No
Thailand	No
Turkey	No
UK	No
USA	No

*Comply-or-explain is not considered here to fulfil a 30% requirement, as companies do not have to adhere to it if they give a suitable explanation, so it is not a strict mandatory requirement.

The EU Regulations

EU Member States and other countries in the European Economic Area are required to meet specific targets to increase female representation on boards by June 2026. Under the EU Directive on Gender Balance on Corporate Boards, all listed companies in member states must ensure that, by the end of June 2026, at least 40% of non-executive board positions are held by women. Alternatively, women must occupy at least one-third of all board seats when combining executive and non-executive roles. Individual EU countries may also enact additional laws to further support these goals. Table 2 provides a summary of the EU countries included by Minerva and their respective board diversity regulations.

Table 2: EU Board Gender Diversity Requirements

COUNTRY	DIVERSITY REQUIREMENTS
<i>Austria</i>	<ul style="list-style-type: none"> At least 30% of supervisory boards must be women at listed companies and those with more than 1,000 employees.
<i>Belgium</i>	<ul style="list-style-type: none"> At least 33% (rounded up) of publicly listed companies' boards must be women. In two-tier companies, 33% of the supervisory board (but not the management board) must be women.
<i>Denmark</i>	<ul style="list-style-type: none"> At least 40% of the board must be women but not exceeding 49% of the underrepresented gender.
<i>Finland</i>	<ul style="list-style-type: none"> At least 40% of the board members must be women by June 2026.
<i>France</i>	<ul style="list-style-type: none"> Companies with more than 250 employees and at least €50m turnover must have a minimum of 40% of their Boards be women. Companies of more 1,000 employees must have at least 30% of executive and governance body roles be women by 2026. This must increase to 40% by 2029.
<i>Germany</i>	<ul style="list-style-type: none"> Listed companies with more than 2,000 employees must have at least 30% female representation on Supervisory Boards. Listed companies with more than 2,000 employees and with at least three board members must have at least one male and one female on their management boards.
<i>Greece</i>	<ul style="list-style-type: none"> All companies must have at least 25% of their board be women. Large, listed companies must have at least 33% females on their board. Large, listed companies with three or more executives present on the board of directors must meet the 33% quota with at least one executive being a female.
<i>Ireland</i>	<ul style="list-style-type: none"> At least 40% of non-executive director positions held by the underrepresented sex. At least 33% of all director positions (including executive and non-executive roles) held by the underrepresented sex.
<i>Italy</i>	<ul style="list-style-type: none"> At least 40% of board directors must be women.
<i>Luxembourg</i>	<ul style="list-style-type: none"> At least 33% of board members must be female by June 2026*.
<i>Netherlands</i>	<ul style="list-style-type: none"> Supervisory boards of listed companies must have at least 33% female representation.
<i>Norway (EEA)</i>	<ul style="list-style-type: none"> If the board has two or three members, both genders must be represented. If the board has four or five members, each gender must be represented by at least two people. If the board has from six to eight members, each gender must be represented by at least three people. If the board has nine members, each gender must be represented by at least four people. If the board has more than nine members, each gender must be represented by at least 40% of people.
<i>Poland</i>	<ul style="list-style-type: none"> Currently no specific quotas but will adhere to the EU Directive on Gender Balance on Corporate Boards by June 2026.
<i>Portugal</i>	<ul style="list-style-type: none"> Both state-owned and listed companies must have at least 33% female representation on both management and supervisory boards.
<i>Spain</i>	<ul style="list-style-type: none"> For listed companies with at least 250 employees and with an annual turnover of minimum €50m, at least 40% of both management and the board must be female.
<i>Sweden</i>	<ul style="list-style-type: none"> Currently no specific quotas but will adhere to the EU Directive on Gender Balance on Corporate Boards by June 2026.

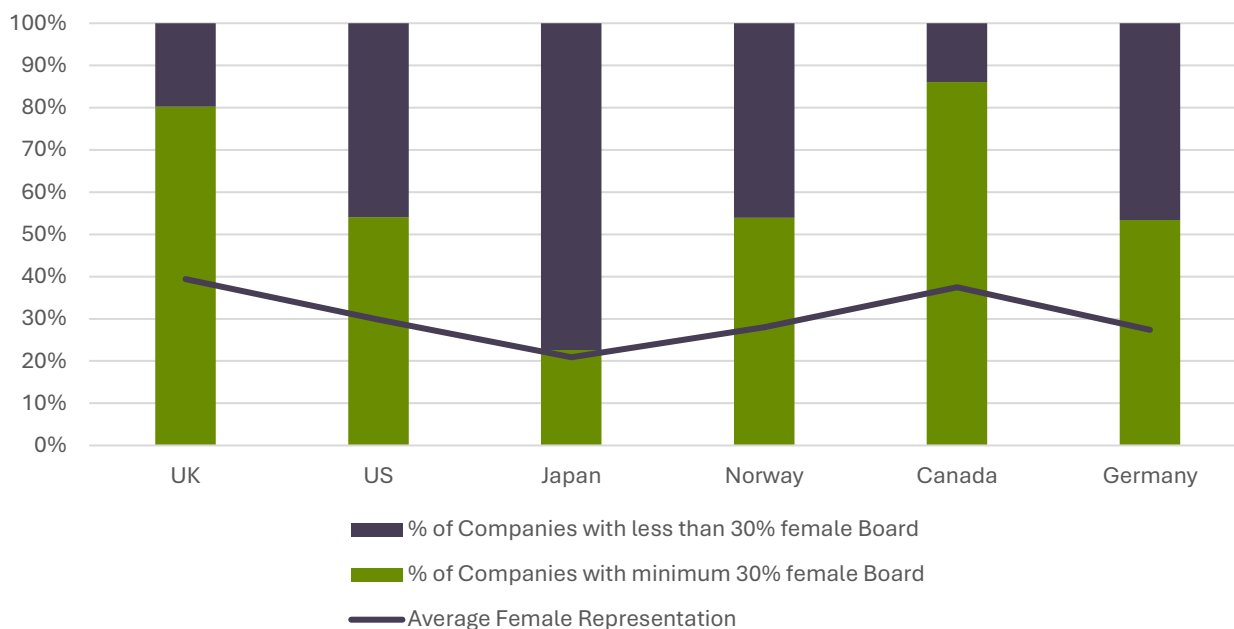
*This law is currently in draft stage and has not yet been officially passed.

Case Studies

To provide a more detailed breakdown, six case study countries have been chosen to demonstrate the range of regulations around gender diversity. These countries are the US, Canada, Germany, the UK, Norway and Japan.

Out of all these countries the UK and Canada's Boards average more than the 30% recommendation. Japan has the lowest average female Board representation at just 21%, as shown in Figure 2 below.

Figure 2: Board Gender Diversity Breakdown by Country



The US:

In the US it is considered good practice for boards to have at least 30% representation of women. Of the more than 2,000 US companies covered by Minerva Analytics, 54% meet the 30% female Board representation recommendation, 11% have at least one female Non-Executive Director (NED) and 7.9% have a female CEO.

Canada:

All public companies incorporated under the Canada Business Corporations Act must disclose diversity data for board and management positions regarding: women, persons with disabilities, ethnic minorities and First Nations/Aboriginal peoples. Companies must also disclose whether they have adopted targets for the representation of the above groups in board and management positions, the timeframe for achieving these targets and progress made towards these targets, on a comply or explain basis.

Of the Canadian firms covered by Minerva, 86% have at least 30% of their board positions held by women, with only 20 out of a total 144 companies not meeting this target. Of the Canadian companies, 6.9% have at least one female NED, while 5.6% companies have a female CEO.

Germany:

As a member of the EU, Germany will be required to comply with the EU Directive on Gender Balance on Corporate Boards by June 2026 and the other requirements outlined in Table 2 above.

German company law additionally requires that:

- All companies set self-determined gender targets for both supervisory and management boards which cannot be lower than the current rate of representation (unless women already meet the 30% quota).
- Companies must report annually on the progress of achieving these targets and companies opting for a 0% target must provide a rationale for this.

More than half (53%) of the German companies that Minerva reports on meet the recommendation of 30% female board positions. Meanwhile, 34% of these companies also have at least one female NED on their boards, the highest percentage of female executives out of all six countries in this case study. Despite the high rate of female Board NEDs, only 2% of German companies have a female CEO.

The UK:

Listed companies in the UK must state in their annual reports whether they have met specific board diversity targets on a 'comply or explain' basis. These targets include:

- At least 40% women on the board.
- One senior board role being held by a woman.
- One member of the board being from an ethnic minority background.

Of the total 570 UK companies tracked by Minerva, 457 (80%) adhere to the minimum 30% recommendation for female board representation. However, the rate of companies achieving the 40% quota as recommended by UK company law on a comply-or-explain basis is notably lower at 59%. In terms of female executives on boards, 21% of all UK companies have at least one, yet just 4.6% UK companies have a female CEO.

Norway:

The Norwegian Public Companies Act stipulates specific quotas that companies must adhere to, as discussed in Table 2 above. These comprehensive quotas ensure that companies have levels of diversity above the 30% recommendation.

Despite Norway's comprehensive quotas for gender representation on their Boards, only 54% of the Norwegian companies covered by Minerva meet the recommended threshold of 30% women on their Boards. Very few have female NEDs at 5.3%, with the same percentage having a female CEO.

Japan:

The Tokyo Stock Exchange requires at least one female director per board. While there is no specific company law requirement in place, there has been a push to require 30% female Board representation by 2030 for companies on the Prime Market, with the country's Corporate Governance Code recommending that companies make specific disclosures regarding representation of women, diversity targets and policies.

Given that Japan has extremely limited requirements for gender representation on companies' boards, it is not surprising that just 23% of all Japanese companies have at least 30% female representation on their boards. Despite this, 14% of companies have at least one female NED, surpassing both Norway and Germany despite these countries having more comprehensive gender quotas and regulations. However, only 1.5% of all Japanese companies have a female CEO, by far the lowest of the six countries in this case study.

Looking Ahead

Diversity, equity, and inclusion will remain a hot topic of debate in 2026. Following fierce opposition in the US in 2025, right-wing policymakers will continue to undermine DEI through restrictive and regressive measures intended to reverse decades of corporate progress. Despite mounting political pressure, many US-based companies continue to uphold their own DEI policies and there has been minimal shareholder support for anti-DEI proposals. Crucially, the anti-DEI agenda has yet to gain meaningful traction outside the US, as European and UK companies and policymakers largely maintain their commitment to DEI. This persistence underscores the enduring value that many attach to diversity, equity and inclusion, despite current political headwinds.

It is possible the US' negative approach to diversity may influence Europe, the UK and other regions as 2026 progresses. Some political groups in Europe and the UK appear to be adopting similar approaches to those seen under Trump, reflecting a noticeable shift towards right-wing politics in these areas. For instance, now-Reform UK MP and ex-Conservative Home Secretary Suella Braverman this month said the party would [repeal the Equality Act](#) as one of its first acts in government if elected. The party last year also [mooted cutting diversity roles](#) in councils that it runs. That being said, the UK and EU remain actively invested in diversity, with widespread recognition of its advantages and demands to abolish these practices remain largely on the margins. Despite pressure from Trump and the US for a corporate rollback on diversity in Europe since last year, the EU has stood strong up to this point with the Commission [reportedly doubling down on DEI](#). The EU Directive on Gender Balance on Corporate Boards will become effective in the coming months, further embedding diversity into corporate culture.

There is a heightened focus on national and regional security in the EU and UK, driven by ongoing instability and geopolitical tensions such as the long-running Russia-Ukraine and Israel-Palestine conflicts and the flashpoints over Greenland and Venezuela earlier this year. This has resulted in governments allocating greater resources and attention towards military preparedness and diplomatic strategies. Consequently, legislative efforts relating to repealing elements of DEI will be low in the priorities of policymakers, as leaders concentrate on addressing urgent defence and foreign policy concerns and safeguarding security takes precedence over debates about social policy reforms.

Taken together, these dynamics suggest that while DEI faces its most concerted pushback in years, particularly in the US, its broader global trajectory remains resilient. The divergence between US political pressures and the continued commitment of European and UK institutions highlights a widening transatlantic gap in approaches to corporate diversity. Yet the sustained support from investors, regulators, and many companies, coupled with the structural benefits DEI brings to governance, talent and long-term performance, indicates that diversity initiatives are far from retreating. Instead, DEI is entering a more contested, politically charged phase. Looking ahead, the durability of DEI will increasingly depend on evidence-based policymaking, stronger regulatory foundations, and the willingness of firms to uphold DEI practices even during shifting political tides.

The enduring benefits of DEI – ranging from stronger reputations and enhanced employee retention to increased shareholder value – remain well recognised by companies, investors, and stakeholders alike. Although DEI currently faces its most significant resistance yet, particularly in the US, attempts to undermine these initiatives represent a regressive move that threatens to reverse hard-won progress. While this anti-DEI sentiment has yet to gain real momentum in Europe or the UK, the ongoing developments in the US serve as an important reminder for global firms and investors to stay vigilant. As the debate continues, the clear advantages of embracing diversity will likely ensure its ongoing relevance in 2026 and beyond despite shifting political winds.

About Solactive



Solactive is a Germany-based index provider operating globally and growing at a

fast pace. Since 2007, Solactive have been developing tailor-made and multi-asset class index solutions for global investors. Currently, Solactive is present in Frankfurt, Dresden, Berlin, Toronto and Hong Kong to provide 24/7 coverage.

Solactive principles

“We take our cue from our clients when deciding what’s important to us. So, it will come as no surprise that security, technical infrastructure and regulatory compliance are high on the list. However, it’s just as important to us to ensure that we truly deliver the products and services that our clients are looking for.”

Reliable and service-oriented

- **Security:** Highest standards for data protection and continuity. Solactive employs a number of industry-standard layers of technology to protect and secure data.
- **Regulation:** Compliance with the applicable regulations and regulatory developments.
- **Proactivity:** True partnership – developing products with clients that matter to them.

For more information about Solactive’s tailor-made and multi-asset class index solutions, please visit <https://www.solactive.com/indices/>.

About Minerva



Minerva, a Solactive company and leading provider of proxy voting and stewardship solutions,

supports investors and other stakeholders in navigating data-disclosure complexity with robust, objective research and voting policy tools.

Investors can quickly and easily identify departures from good practice based on their own individual preferences, local market requirements or apply a universal good practice standard across all markets.

Minerva’s Core Services

- **Global vote agency:** core competence covering bespoke policy, data, research, execution, vote analytics and reporting.
- **ESG research:** covering >90% of the World’s listed companies by value.
- **Sustainability consulting:** TCFD reporting, RI policy creation, IS reporting, sustainability reporting, carbon footprinting, ‘Governance Watch’ and asset owner/manager ESG audits.
- **SDG mapping:** assessing potential alignment/impact of client investments on the delivery of the UN Sustainable Development Goals.
- **Screening:** ESG norms-based analysis that identifies controversial products and breaches of global standards.

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