



Let's go further



DIVERSITY & NON-DISCRIMINATION POLICY



1 INTRODUCTION

The overall aspiration with this policy is to describe EGs commitment to Diversity and Non-discrimination, including our ambition to create and maintain a work environment for all employees, that is inclusive and free from any kind of discrimination. The policy is based on our obligations in applicable national laws, International Human Rights Law, the UN Guiding Principles on Business and Human Rights, principle 6 and of the ten principles of the UN Global Compact.

1.1 APPLICABILITY

The policy applies to all employees and consultants and/or contracting staff working in EG. Please see the list of legal entities in the EG Group on www.global.eg.dk/companies

1.2 DEFINITIONS

In this section a couple of key definitions, which will help to clarify the meaning of this policy, will be presented. Other terms and definitions can be found in the appendix, in section 7.

In this policy "EG" shall also be referred to as the company.

Diversity

The range of human differences, including but not limited to gender, transgender identity or expression, ethnicity, religion, disability, sexual orientation and age.

Discrimination

Any less favorable treatment or differential treatment or when a person's dignity is violated based on factors other than job experiences, competencies and skills. This includes, but are not limited to gender, transgender identity or expression, ethnicity, religion, disability, sexual orientation and age.

Harassment

Harassment is a form of discrimination. In general, there are two types of harassments:

1. **Harassment of improper behavior** includes advances, requests, and other physical, verbal or non-verbal misconduct that are related to a person's race, gender, transgender identity or expression, ethnicity, religion, disability, sexual orientation and age or other. Harassment can involve one or multiple incidents, and can cause a person to feel offended, humiliated, or intimidated. It can for example express as deliberate insults, physical threat or abuse, unsubstantiated complaints, continued interference of personal work space, display of offensive material, exclusion from work communication, and intrusion into personal life.
2. **Sexual harassment** includes unwanted sexual or romantic proposals, inappropriate jokes or comments about sexual activities.

Victimization

Victimization are all acts that are directed to one or several individuals and are of an offensive character, for example bullying, being moved to a position with lower responsibilities without objective reasons for it, insults and withholding of information.

2 DIVERSITY & NON-DISCRIMINATION AT EG

Respect for human rights are fundamental within EG and for several years we have been committing ourselves to the UN Global Compact. You can read more about this in our UN Global Compact Communication on Progress on www.eg.dk/csr

Within the UN Global Compact, principle 6 is about eliminating discrimination with respect to employment and occupation. We believe this is important, not only from a justice perspective, but also from a business perspective.

We are convinced that diversity and non-discrimination make us stronger - differences give us access to more perspectives, which give us the creative fuel to create something better for our customers as well as to create a better working environment.

A prerequisite for diversity is an inclusive culture. Therefore, we strive to create an environment where discrimination does not exist and where each of us feel respected, included, can thrive and unlock our full potential.

2.1 IN EG DIVERSITY AND NON-DISCRIMINATION MEANS, THAT WE:

- Embrace workforce diversity with regards to e.g. gender, transgender identity or expression, ethnicity, religion, disability, sexual orientation, age and other attributes who makes us who we are;
- Value a diversity of perspectives – leveraging the diverse personalities, thinking, skills, experience and working styles of our employees, customers and other stakeholders;
- Treat every employee with respect and dignity and having a zero-tolerance attitude to discrimination, harassment or victimization of any kind;
- Build a flexible organization – providing opportunities for work arrangements that accommodate the diverse needs of individuals at different career and life stages;
- Seek to achieve higher standards than the minimum set out in legislation and proactively encourage a culture that supports diversity and equal opportunities.

2.2 APPLICATION OF THE DIVERSITY & NON-DISCRIMINATION POLICY TO

Working environment/workforce culture

We strive to have work environment and a workforce culture that provide equal opportunities for everyone to thrive and do their best. From a physical perspective we want to offer employees a safe work environment with equal access to facilities, tools and equipment. From a social perspective we want everyone to feel welcome and listened to. We also want our work environment to be completely free from discrimination, harassments and victimization, by having a zero-tolerance attitude and acting promptly when needed.

Recruitment and selection

We want to attract the best people with different perspectives, in order to contribute to better business results. To succeed with this, we must select candidates from the widest possible talent pool. This can only be possible with an unbiased recruitment process with a competency-based approach, where competences relevant for the position count – not gender, age etc.

When making the final selection in a recruitment process, we seek to have final candidates who are diverse. It is not always possible, but important to strive for.

When recruiting leaders in general, and to the executive leader team in particular, at least two candidates from an underrepresented gender and/or group shall be considered.

Training and career development

Training is important to improve performance in job as well as to prepare employees for their next step. We want to offer all employees within EG equal access to training- and career development. To achieve this, all employees are entitled to continuous GROW conversations, where the employees' performance, development needs and career wishes are discussed.

We also strive to ensure a gender balance – both in training activities as well as in succession plans.

Reward and recognition

Our ambition is to provide equal pay for equal work. Therefore, all employees are offered the same benefit scheme and any potential salary raise within the annual salary review, will be based on performance.

Opportunity to combine private- and working life

We are all at different stages in our life's and careers and no matter where we are, it should be possible to combine private and working life. Therefore, we strive to offer equal opportunities for flexible work arrangements, as long as it supports both business and individual needs.

We also encourage parental leave to employees who become/are parents and make sure to follow applicable rules in each country regarding parental benefit. In the event of parental benefit supplement, we make sure it is gender neutral.

2.3 OUR OBJECTIVES FOR DIVERSITY & NON-DISCRIMINATION

We have targets for each of the ten principles within UN's Global Compact, and among these our diversity and non-discrimination targets can be found. Data regarding diversity can be difficult as well as prohibited to collect and measure, and therefore our objects focus on what we can collect and measure:

1. As a workplace, we strive to exceed the gender balance within the IT industry

We want both men and women to work within EG. We strive to have a more equal gender balance than the industry in general.

2. Equal opportunities for leadership at all levels for men and women

We want both men and women to be leaders within EG. The gender balance in leadership positions, at all levels, should reflect the overall gender balance within the company. We also want both genders represented in the board.

3. We will pay our employees equal salaries for equal work regardless of gender

Salaries within EG may be individual and differentiated, but not unjustified. We must have equal salary at each role on each competence level.

4. We want a workplace free from discrimination, harassment and victimization

The number of annually reported incident in relation to discrimination, harassment and victimization shall be zero.

2.4 DIVERSITY AND NON-DISCRIMINATION ON THE AGENDA

Follow up on objectives

To make sure we are moving in the right direction, we measure and follow up on diversity and non-discrimination metrics. The results and actions will be published at Yammer, at least once a year.

In addition, all managers within EG will have access to reports, where gender diversity metrics are included.

Continuous focus

To ensure a long-term sustainable focus on diversity and non-discrimination, we continuously incorporate diversity and non-discrimination perspectives into key HR processes throughout the employee lifecycle, e.g. talent acquisition, talent management and leadership development.

3 RESPONSIBILITY & COMPLIANCE

3.1 WE ARE ALL RESPONSIBLE

All employees within EG must respect and contribute to diversity and non-discrimination.

Common responsibility

- Know, understand and comply with this policy.
- Report any breach to this policy to nearest manager or Human Resources.

Manager responsibility

Additionally, all managers within EG have an extra responsibility for diversity and non-discrimination activities, which include, but are not limited to:

- Ensure employee related decisions are free from discrimination.
- Mitigate potential unconscious bias in employment decisions, career development decisions etc.
- Role-model inclusive behavior.
- Report misconduct or breaches to this policy to Human Resources.
- Ensure that employees who report any misconduct or breach to this policy are not victimized for doing so.
- Be aware that, even if EG is welcoming a wide range of relationships within the company, romantic relationships, family relationships or other close relationships between managers and anyone in their reporting line are prohibited. Managers who have or enter such a relationship with an employee in their reporting line must disclose the relationship to Human Resources, who will recommend steps to resolve the matter appropriately.

Responsibility of anyone being accused

- When receiving feedback on own inappropriate behavior – immediately stop that behavior.
- Contact nearest manager or Human Resources, to discuss the feedback and behavior.
- Cooperate in investigation processes.

Responsibility of anyone experience being treated unfairly

- When feeling discriminated or harassed - if possibly make clear this is not accepted.
- Report any experienced misconduct or breach to this policy to manager or Human Resources.
- Cooperate in investigation processes.

3.2 REPORTING INCIDENTS

Employees who believe they have been victims of conduct prohibited by this policy or have witnessed such conduct, should discuss their concerns with their manager, local Human Resources Business Partner and/or Human Resources Director. Managers receiving a report of misconduct or breach shall always report to Human Resources.

All incident reports should if possible be in writing. If this is not possible, Human Resources will establish a report. Any documentation of an incident will be deleted when investigation and follow up has been completed.

There is always a possibility to report anonymously through EGs whistleblower system. Please see more information in the Whistleblower Scheme.

3.3 INVESTIGATION OF AN INCIDENT

After the incident is reported to Human Resources, the following steps shall be taken:

1. Human Resources shall immediately investigate the incident to determine its severity. In severe cases, a third party may be brought in upon request for mediation or investigation
2. If necessary, the involved parties shall be released from work duties during the investigation
3. Human Resources shall determine the appropriate disciplinary action(s).
4. Upon completion of the investigation, Human Resources shall summon the involved parties for either individual or group meetings depending on the case
5. Human Resources will implement and follow-up the disciplinary actions

3.4 NON-COMPLIANCE CONSEQUENCES

Breach or non-compliance with this policy may lead to breach of the employment contract with the company. Such breach can lead to reprimands such as for example verbal or written warning, redeployment, temporary suspension or permanent dismissal in severe cases.

3.5 COMPLIANCE PRINCIPLES

- Any reported misconduct or breach to this policy will be handled promptly.
- Retaliation against anyone reporting an incident in good faith is strictly prohibited.
- Any employee who believe they have been victims of conduct prohibited by this policy will be treated with respect and can be entitled to external aid during and after the investigation process.
- Any employee accused of inappropriate behavior will be treated with respect.

4 RELATED POLICIES AND SOPS

RELATED POLICIES	
Whistleblower Scheme	Anti-corruption Policy
ESG Policy	Health and Safety Policy
EG Code of Conduct - Workers	

5 POLICY REVIEW AND UPDATE

5.1 POLICY REVIEW

This policy is to be reviewed on an annual basis. The review will be conducted by HR Director and presented to the CEO for approval.

5.2 POLICY UPDATE

Major changes to this policy are to be approved by the CEO. Minor changes are to be approved by the HR Director.

5.3 REVISION HISTORY

VERSION	DATE FOR CHANGE	AUTHOR	APPROVED BY	SUMMARY OF CHANGE
1.5	07.07.2020	JOLYK	HHANS	New policy template. Text is reviewed and rewritten where applicable.
2.0	November 2021	JHANS	TIBOD	Policy reviewed and updated. Only minor changes – no material changes.
3.0	February	JHANS	TIBOD	New policy template.

6 DOCUMENT MANAGEMENT

POLICY X – DOCUMENT MANAGEMENT	
Version	3.0
Published	
Author	JHANS
Policy Owner	TIBOD
Approval date – HR Director	
Last Review – date	April 2022
Next Review – date	April 2023

7 APPENDIX

7.1 DEFINITIONS

TERMINOLOGY	DEFINITION
Competency-based recruitment	A method used in recruitment processes to ensure focus on relevant and requested competencies, and to keep those in mind throughout the whole recruitment process to prevent focus on irrelevant attributes.
Inclusion	The achievement of a work environment in which all individuals are treated fairly and respectfully, have equal access to opportunities and resources, and can contribute fully to the organization's success.
Unbiased	Being fair and objective, not favoring or treat someone unfair.
Under represented group	A group that it less represented in a subset, e.g. a company, than in the general population. This can refer to gender, transgender identity or expression, ethnicity, religion, disability, sexual orientation and age.