

Netcompany



Diversity, Equity, and Inclusion Policy

TABLE OF CONTENTS

| | | |
|-----------|--|----------|
| 1 | Introduction | 3 |
| 2 | Background | 3 |
| 3 | Empowering diversity, equity, and inclusion | 3 |
| 4 | Diversity | 3 |
| 5 | Equity | 4 |
| 6 | Inclusion | 4 |
| 7 | Focus on Diversity in Managerial Positions | 4 |
| 8 | Board of Directors | 5 |
| 9 | Follow-up and Reporting | 5 |
| 10 | Review and Amendment | 5 |
| 11 | Publication | 5 |

1 INTRODUCTION

- 1.1 This diversity, equity, and inclusion policy (the “Policy”) has been adopted by the Board of Directors of Netcompany Group A/S, CVR no. 39 48 89 14 (“Netcompany”, “our”, “we”, or “us”) in accordance with the Recommendations on Corporate Governance and the Danish Companies Act, section 139 c, where and if applicable.
- 1.2 The purpose of our Diversity, Equity & Inclusion Policy is to describe how Netcompany will ensure equal opportunities, build an inclusive culture, and contribute to the societies in which we operate through:
- (i) ensuring equal opportunities for all and recognising that everybody should be respected for who they are;
 - (ii) ensuring that Netcompany is a contributor to social sustainability in the societies we operate in; and
 - (iii) increasing the share of the underrepresented gender in other managerial functions.
- 1.3 The Policy herein shall apply to all levels of the company organisation in all entities in the group, including the Board of Directors and the Executive Management.

2 BACKGROUND

- 2.1 Our commitment to diversity, equity, and inclusion (collectively referred to as “DEI”) is grounded in our values and our commitment to upholding international principles on human rights. We have zero tolerance towards any kind of discrimination, harassment, or bullying of employees due to any social identity, such as age, culture, nationality, ethnicity, gender, physical abilities, experience, political and religious beliefs, sexual orientation, and other attributes (collectively referred to as “Social Identity”), as stated in our internal employee handbook.
- 2.2 We are a people’s business. It is our employees who make what we do possible and allow us to deliver on our purpose – to build strong, sustainable societies around the world. This requires a culture of inclusion where all employees feel supported, valued, and enabled to be their best. It is also by reflecting the diversity of our clients and the population in the countries that use our services that we can better understand and meet the needs and requirements of our clients. That is also why we consider DEI business-critical, not simply a compliance necessity.
- 2.3 We are committed to further strengthening DEI throughout the company, including in our managerial functions, by striving to achieve a better balance between employees regardless of Social Identity, both in terms of recruiting and internal advancement. Through targeted initiatives and investment in our internal Social Strategy covering, amongst other, our DEI initiatives, we work towards meeting this ambition.

3 EMPOWERING DIVERSITY, EQUITY, AND INCLUSION

- 3.1 We believe that an inclusive and unbiased culture is imperative for maintaining competitiveness in the market and securing better problem-solving abilities and innovation. It is our intention to continue to safeguard a culture where all employees feel presented with the same opportunities for career development and advancement.
- 3.2 Our vision is to foster a culture deeply connected to our values, that welcomes differences and actively promotes DEI while championing these principles in our societies for positive change and progress. We embrace diversity by attracting varied backgrounds, ensure equity via fair career opportunities and pay, and cultivate inclusion by creating a psychologically safe, trusting, and enjoyable environment. Externally, our commitments aim to utilise our capabilities for improvements for the societies in which we operate.
- 3.3 We will monitor the progress of our DEI initiatives through the ambitions and measures in our Social Strategy. We will continuously ensure their effectiveness and change these measures as our culture matures and becomes more diverse and inclusive so that we keep improving.
- 3.4 Upholding the values of DEI is a key commitment for us, and we wish to emphasise the importance of these values in all aspects of our work.

4 DIVERSITY

- 4.1 We are a rapidly growing company that operates in highly competitive markets with companies fighting to employ the very best talent. Therefore, it is essential that we can attract talent from the widest talent pool possible.
- 4.2 Our objective is to have a variety of proficient candidates, encompassing as many Social Identities as possible with a broad range of experiences, when filling positions, including managerial roles. Our hiring procedures are designed to ensure equal opportunities for all candidates regardless of Social Identity, in applying for and attaining positions at any level. However, we only employ the best candidates and the deciding factor, in both internal and external recruitment processes, is always qualifications.

- 4.3 To support equal access for all to vacant positions in our organisation, we continuously focus on removing barriers that might deter underrepresented minorities from being appointed to a position, including managerial positions. This is applied to all stages of the hiring process, including job descriptions, job advertisements, screening of applicants, and job interviews.
- 4.4 While we value diversity in all forms, we recognise the IT industry's gender disparity and prioritise increasing the representation of women throughout the company. Collaboratively, we work with leading educational institutions on initiatives promoting diversity, and in our recruitment process we aim for a balanced representation of men and women. Furthermore, through our employer branding, we actively encourage more women to pursue careers in IT, by implementing various initiatives to support this ambition.

5 EQUITY

- 5.1 Netcompany focuses on creating an attractive working environment which promotes equal career opportunities for all employees regardless of Social Identity. We believe that it is through different perspectives and experiences that we can gain the competitive advantage needed and leverage the effect of diversity for business growth. This requires a focus on equal opportunity throughout the organisation.
- 5.2 Through our global internal career development programme and our global performance and progression processes, we make sure that all employees are treated equally and are offered similar opportunities across locations. Our career paths create broad opportunities for employees to choose a career that accommodates personal goals.
- 5.3 All employees are assigned a mentor who will support their development, be aware of their well-being, and ensure that they are prepared for the next steps in their career.
- 5.4 In Netcompany, we have transparent and fair promotion processes. We are constantly developing our talent management and ensuring that our employees are assessed in a fair and consistent way. We monitor all our development and performance management processes on a continuous basis and measure the perception of training through surveys, impact of training (management assessments), promotion ratios etc.
- 5.5 It is the level of experience and qualifications that determine the salary level, and equal pay is given for equal work regardless of gender or any other unjust reason that does not reflect the true qualifications of our employees.

6 INCLUSION

- 6.1 We want to ensure an inclusive culture where all our employees feel welcome, valued, and supported, as individuals, and in their career aspirations.
- 6.2 We want to ensure that all employees, regardless of gender, gender expression, sexuality, disability, age, religion, ethnic background, nationality, and other backgrounds, feel they are met with empathy and respect as well as equal opportunities for growth and well-being. As an international company with employees across several countries, our dedication to inclusion and equal opportunities for career growth and personal well-being also extends to our international collaborations and teams.
- 6.3 We believe that teams of complementary strengths and different backgrounds are of great value and that a work environment where employees can contribute fully, and express perspectives and offers the best foundation for creating value for our customers.
- 6.4 All our leaders and employees play a key role in ensuring a safe environment which inspires teamwork aimed towards fulfilling shared goals as well as a work environment where we care for each other's well-being and pay attention to the inclusion of all. This requires that team members respect and value each other's opinions and consider the ideas and suggestions put forward by others. By embracing a collaborative approach and genuinely engaging with one another as colleagues, we collectively foster an inclusive culture that benefits everyone involved.
- 6.5 We are dedicated to the fair treatment of all employees and our business model has built-in reviews and structures to ensure this in our processes throughout the employee journey. We continually review and adjust our processes to ensure the core values of fairness, equal opportunities, and fair rewards, and recognition for employees who support Netcompany in meeting our goals.

7 FOCUS ON DIVERSITY IN MANAGERIAL POSITIONS

- 7.1 As part of our DEI commitment, we want to increase the representation of all Social Identities across all roles, with a particular focus on managerial positions. We recognise the immense value in fostering a balanced leadership in our organisation which reflects the diversity of our workforce and customers. Recognising the gender disparity in the IT industry, we are committed to increasing the under-represented gender across our managerial positions. By doing so, we believe we can stimulate innovation and problem-solving within our ranks while also providing role models and paths to leadership for all our employees.

7.2 Our aim is to create an inclusive work environment which promotes equal career opportunities for all. In order to ensure equal access for all to vacant positions, we continuously strive to remove barriers that may prevent underrepresented groups from being appointed to management positions. This applies to all steps of the employee life cycle, starting with the hiring process.

7.3 Furthermore, we ensure that managerial desires and ambitions are taken into consideration in our people development process. Furthermore, we aim to offer a sensible work/life balance to reconcile the demands of working life and family life.

8 BOARD OF DIRECTORS

8.1 It is our ambition to have a diverse representation in terms of work experience, culture, international experience, and gender in our Board of Directors.

8.2 The Board of Directors currently consists of members which together establish an equal gender representation. Our ongoing ambition is to maintain a balanced representation and to set targets for the under-represented gender at the Board of Directors in accordance with Danish legislation when applicable. This commitment ensures that we continue to exceed the Danish industry average.

8.3 As for Netcompany's subsidiaries, Netcompany has reached the target of including at least one female board member elected by the general meeting by the end of 2019 for each of its Danish subsidiaries which independently are subject to the requirements set out in Section 139 c (2) of the Danish Companies Act. This means that there are no under-represented genders, and a new target will be set when applicable. Netcompany will for each applicable subsidiary set targets in accordance with relevant legislation, where applicable.

9 FOLLOW-UP AND REPORTING

9.1 We continuously monitor and follow up on the implementation and influence of our Policy as well as the internal Social Strategy and its initiatives. It is a collaborative effort between international stakeholders, which allows for a more dynamic approach. With a commitment to continual evolution and improvement informed by our people's insights, we strive to enrich our organisation and ensure Netcompany remains a great workplace for all. One way in which we accomplish this is by carrying out our yearly Social Survey, where we inquire about the employees' perception of our organisation, our leaders, and our culture. Furthermore, we have a number of well-established ERGs, each of which regularly provide feedback and input in order to aid the furthering of our inclusivity.

9.2 The Policy is approved by the Board of Directors and the day-to-day responsibility for ensuring that the content of the Policy is adhered to is delegated to the Executive Management, including upholding the values as set out in the Policy in all HR processes. The HR business unit therefore plays a key role in their assistance to the Executive Management by ensuring that employment procedures are following the Policy, including ensuring that managers have the prescribed dialogue about development and training with employees in Netcompany.

9.3 Further, HR records the trend in the proportion of diversity in our managerial positions, which will be reported to the Executive Management and to the Board of Directors at least once a year. Relevant DEI activities and progress is monitored internally and reported externally annually in the annual report in accordance with applicable law and regulations, including section 107(d) of the Danish Financial Statements Act.

10 REVIEW AND AMENDMENT

10.1 The Board of Directors shall annually review and if relevant update the Policy.

11 PUBLICATION

11.1 The Policy will be published on Netcompany's website and internally.