

Gender equality & diversity policy

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Supporting documents

- Appendix 1: Guidance and template for gender equality target setting
- Appendix 2: Gender equality risk assessment
- Appendix 3: Gender pay equality audit

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1. Introduction

At Storskogen, **equality** and **diversity** are crucial to our long-term success and sustainability. We strive to create an **inclusive workplace** where all employees are given **equal opportunities**, regardless of **gender**, **age**, **ethnicity**, **religion**, **disability**, **sexual orientation**, **transgender identity**, **political beliefs**, or other background. By promoting these values, we strengthen our **competitiveness** and contribute to a **sustainable societal development**.

2. Purpose

This policy aims to ensure a working environment where all employees have **equal rights** and opportunities. We work systematically to prevent **discrimination** and promote **equality** and **diversity**, in accordance with **applicable EU** and **national legislation** and **international standards**.

3. Scope

This policy applies to all employees working within Storskogen and its subsidiaries, irrespective of location.

3.1. Adaptation for subsidiaries

Subsidiaries are encouraged to scale and adapt this policy to their size, operational risks, and local legal requirements, ensuring alignment with Storskogen's overarching gender equality and diversity objectives.

Minimum requirements:

All subsidiaries must fulfil the **minimum requirements** of this policy, including:

- **Non-discrimination**: Ensuring equal treatment and opportunities regardless of gender, ethnicity, or other protected characteristics.
- **Gender Balance in Management**: Achieving a gender balance of 40-60% at management levels.
- **Equal Opportunities**: Providing equal access to career advancement, training, and development for all genders.
- Fair Pay for Equal Work: Ensuring equal pay for equal work and addressing any gender pay disparities.

4. Definitions

Equality: Means that women and men have the same **rights, obligations** and **opportunities** in all areas of working life.

Diversity: A variety of characteristics of individuals, including **gender**, **age**, **ethnicity**, **religion**, **disability**, **sexual orientation** and **cultural background**.



Discrimination: Unfavorable treatment based on **gender**, **ethnicity**, **age**, **religion**, **sexual orientation**, or other legally protected characteristic.

Gender balance: A distribution of **40-60% representation** of both genders at all levels of the organisation.

Pay review: A process of reviewing pays to identify and address undue differences in pay between women and men for work of equal value.

Management: Individuals with **strategic** and **operational responsibility**, including **CEO**, **CFO**, business area managers, and board members.

5. Governance and responsibility

The equality and diversity work within Storskogen is guided by the following principles:

- Monitoring and reporting: The Board is responsible for monitoring compliance with the equality and diversity policy, integrating initiatives into the company's strategy, and ensuring targets are set, evaluated, and met
- Risk management: Regular risk assessments identify barriers to diversity and equality, with actions taken to prevent discrimination and inequalities.
- **Training:** All **employees** receive **training** to understand the policy and apply it in practice, promoting an **inclusive work environment**.
- Internal control: Management ensures compliance with policies and laws, conducting regular reviews to strengthen internal controls and continuous improvement.

Role/title	Responsibility			
Group Board	Has the ultimate responsibility for approving and monitoring compliance with the equality and diversity policy across the group. Will also ensure that diversity initiatives are integrated into the overall company strategy.			
CEO	Responsible for implementing the policy and ensuring that equality and diversity work is carried out at all levels, and reporting to the board on progress and challenges.			
Subsidiary Boards	Monitors and ensures compliance with the equality and diversity policy within the respective subsidiaries, and that adequate resources are provided.			
Subsidiary CEOs	Ensures that the policy is implemented and followed within the subsidiary, and that relevant diversity initiatives are implemented and employees are trained in this area.			

The roles for implementation and monitoring of the policy are divided as follows:



Employees	All employees are responsible for complying with the policy and contributing to a workplace free from discrimination. Incidents and violations of the policy or legislation should be reported immediately. If necessary, cases can be reported anonymously via the Storskogen whistleblowing function: https://report.whistleb.com/storskogen.



6. Our commitment

Storskogen is committed to complying with **international standards**, including **ILO conventions**, to ensure **fair working conditions**, **equal opportunities**, and the elimination of all **discrimination**.

- Discrimination: We do not accept any form of discrimination and actively work to create a working environment where all employees feel welcome and respected, regardless of their background.
- Gender balance: Storskogen and its subsidiaries work to achieve a 40-60% gender balance in management positions.

7. Equality and diversity in practice

Storskogen ensures equality and diversity through concrete actions:

- **Recruitment and promotion:** Actively recruit from a broad talent pool to increase the **diversity** of the workforce. All recruitment and promotion decisions are based on **skills** and **experience**, without **discrimination**.

- **Equal rights and conditions:** All employees should have equal access to **training, development opportunities** and **career paths**, regardless of their background.

- Work environment: We strive to create a safe and inclusive work environment.

- **Training and counselling:** All employees and managers undergo regular **diversity** and **inclusive work environment training**.

- Networking groups and mentoring: We encourage networking groups and mentoring to support diversity and inclusion.

- **Pay and conditions:** We conduct annual **pay gap analyses** where required by law to ensure no unjustified pay differences. We **encourage all subsidiaries** to adopt this practice to promote equity and transparency.

- **Review and follow-up:** Customised follow-up based on the size of the company to ensure compliance with **policies.**

8. Targets, monitoring and reporting

Storskogen sets **equality** and **diversity** targets that are monitored, analysed and reported in the annual report.

9. Compliance

If the policy is not followed, it should be reported to the **immediate manager** or **HR**. If necessary, incidents can be reported anonymously via the Storskogen whistleblowing function: <u>https://report.whistleb.com/storskogen</u>.



10. Version history This policy is reviewed annually and updated as necessary.

Version	Revision date	Description of changes	Author	Approved by	Date of approval
1.0			Ulrika Brinck/ Amelie Nordin	Storskogen Board of directors	2021-08-12
1.1	2023-10-18	Change of the scope of the policy from group level to the headquarter.	Amelie Nordin/Greta Dorthé Ladow	Storskogen Board of directors	2023-11-06
1.2	2024-10-14	Adaptation and revision to suit the whole group.	Amelie Nordin	Storskogen Board of directors	2024-11-06