

NETCOMPANY GROUP A/S

# DIVERSITY, EQUITY & INCLUSION POLICY

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netcompany

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## 1 Introduction

This Diversity, Equity & 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 Section 139c of the Danish Companies Act and the Recommendations on Corporate Governance.

The purpose of our Policy is to describe how Netcompany will ensure equal opportunities, build an inclusive culture and contribute to the societies in which we operate and to:

- I. Ensure equal opportunities for all and that everybody should be recognised and respected for who they are
- II. Ensure that Netcompany is a contributor to social sustainability in the societies we operate in
- III. set target figures for the share of the underrepresented gender in Netcompany’s Board of Directors, and
- IV. increase the share of the underrepresented gender in other managerial functions.

The Policy and the targets herein shall apply to all levels of the company organisation, hereunder the Board of Directors and the Executive Management, as well as to all entities in the group.

## 2 Background

Netcompany’s commitment to DE&I is grounded in our values, our commitment to the UN Global Compact and the basic human rights of our employees. Netcompany has 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.

Netcompany is 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 DE&I business-critical, not a compliance necessity.

Inclusion is the process of involving, accepting, and valuing all people in the workplace regardless of their differences and Social Identity.

Netcompany is committed to further strengthen diversity and inclusion 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, we work towards meeting this ambition.

## 3 Three DE&I Pillars

Netcompany believes that an inclusive and unbiased culture is imperative for securing and maintaining competitiveness in the market, securing better problem-solving abilities, and innovation. It is our intention to continue to safeguard a culture where every employee experience the same opportunities for career development and advancement.

Netcompany’s aspiration for DE&I is anchored in three pillars: 1) Diverse talent, 2) equal opportunities, and 3) inclusive culture. It is these three pillars that guide how we approach and support the integration of DE&I in our core processes where relevant and possible, and ensure that we increase awareness and secure focus on creating and maintaining a diverse and inclusive workplace.

We will monitor the progress of our DE&I initiatives continuously to ensure their effectiveness and change these measures as our culture matures and become more diverse and inclusive so that we can keep raising the bar.

## 3.1 Diverse Talent

Netcompany is 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.

It is our objective to have as many skilled candidates as possible of any Social Identity and with a broad field of experiences to choose from when filling positions, including management positions. For this reason, we strive to broaden the field of candidates as much as possible, and our employment procedures are designed to give employees regardless of Social Identity equal opportunities to apply for and obtain any position at any level. Still, we only employ the best candidates and the decisive factor, in external as well as internal recruitment processes, shall be the candidates' qualifications.

To support equal access for all to vacant positions in Netcompany, we continuously focus on any barriers that may prevent underrepresented minorities from being appointed to a position, including management positions. This applies to all steps of the employment procedure, including job descriptions, job advertisements, screening of applicants, and job interviews.

### 3.1.1 Expanding the Recruitment Pool

The IT industry remains a male-dominated industry. Netcompany believes that a diverse range of different employees promotes innovation and therefore increasing the number of female IT students is a big priority for Netcompany. Netcompany collaborates with the main educational institutions from which we recruit new employees on initiatives that promote diversity in the IT industry.

Fortunately, we are seeing increasing numbers in female IT students these years.

In Netcompany, increasing the number of women applying to and being offered a position is a key priority. For this reason, we have targets for recruitment in order to secure diversity in our shortlists, and we follow up on these targets, measuring the gender composition throughout the recruitment process.

Attracting more women to IT in general, and Netcompany specifically, is also a key ambition in our employer branding, and we engage in a long list of initiatives to promote IT among women.

Further, Netcompany has expanded the recruitment pool by also employing graduates with other educational background such as for instance Master of Science (MSc) in Mathematics or Master of Science in Physics where relevant.

## 3.2 Equal Opportunities

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.

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. The programme is flexible and suited to meet the individual needs of each employee.

All employees are also assigned a mentor that will support their development, be aware of their well-being, and ensure that they prepare for the next step on their career path. Our career paths create broad opportunities for employees to choose a career that accommodate personal goals.

In Netcompany, we have transparent and fair promotion processes. We are constantly developing our performance process and ensuring that our employees are assessed in a fair and consistent way.

We measure all our development and performance processes on a continuous basis and measure perception of training through surveys, impact of training (management assessments), promotion ratios etc.

It is experience and qualification that determines 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.

### 3.2.1 Increasing the Number of Women in Managerial Positions

In Netcompany's managerial positions we are very focused on equalising the gender distribution which, in the context our Netcompany as an IT company, requires a focus on women as there are statistically fewer women in the industry. This is not only a Netcompany problem, but a societal problem and there is a drastic need to deal with the lack of women in the tech and IT industry.

In Netcompany, we aim to ensure that employees from underrepresented minorities experience the same opportunities in their careers and in achieving managerial positions as the overrepresented counterparts.

We focus on creating an attractive working environment which promotes the equal career opportunities of men and women. In order to support equal access for men and women to vacant positions, Netcompany continuously focuses on any barriers that may prevent women from being appointed to a management position. This applies to all steps of the employment procedure. Consequently, job descriptions, job advertisements, screening of applicants, and job interviews are not aimed at a particular gender.

Furthermore, we make sure to cover managerial desires and ambitions in our bi-annual employee development interviews and aims to offer a sensible work/life balance to reconcile the demands of working life and family life.

## 3.3 Inclusive Culture

In Netcompany, we strongly believe that we create the best results when we know each other and have fun together. For this to happen, you need an inclusive culture that allows all employees regardless of Social Identity to feel valued, involved and accepted. Only by having such a culture, you allow for true creativity, inspiration, innovation, and growth.

In 2020, we strengthened the ability of our internal global development programme to create alliances and strong internal networking across countries with global multi-day workshops, bringing employees from our locations across the world together. This way we can to an even larger extend share competencies and our distinct Netcompany culture.

Internally we put a great amount of effort into creating social activities, creating social bonds across teams and locations with other like-minded employees, including establishing inclusive social clubs such as a LGBTQ+ network, and WiN (Women in Netcompany, which for instance aims to host fun and mind-broadening events with a feminine touch to promote women in Netcompany and in IT in general. In addition to Netcompany's social clubs, Netcompany have several event committees that regularly hosts various different types of social events where everyone can feel included, both in terms of the type of activity, time, and catering.

Key to an inclusive culture is inclusive leaders. Leaders who show commitment to DE&I and make it a personal priority. In 2020, we decided to make inclusive leadership training an integral part of our New Manager Seminar. The training will focus on creating space for others to contribute, awareness of bias and personal blind spots, how to demonstrate an open mindset and having curiosity about others, listening without judgement, and seeking to understand those around them, as well as effective collaboration – how to empower others and create team cohesion. Netcompany is in the process of expanding our program regarding inclusive leadership so it's a separate training program.

In 2022, we further strengthened our inclusive culture by kickstarting our global Employee Resource Groups initiative. Our Employee Resource Groups are voluntary, employee-led groups of employees who share characteristics or life experience.

The main purpose of our Employee Resource Groups is to drive diversity and inclusion in the workplace by providing suggestions and initiatives to improve the employee experience, increase the feeling of inclusion and belonging in the workplace and support Netcompany's work for a diverse workplace. In 2022, we also launched an internal anonymous inclusion survey with the purpose providing us with valuable input in our efforts to continuously improve Netcompany as a workplace taking all persons into account.

## 4 Social Identity Target(s)

It is Netcompany's ambition to have a diverse representation in terms of work experience, culture, international experience, and gender as we believe it increases the quality of our work. We want to share our knowledge, educate, and develop more digital talent and IT leaders, and open the world of IT up to even more people – regardless of gender or other Social Identity.

Netcompany believes that all are equal no matter what and that diversity ensures Netcompany is stronger overall.

## 4.1 The Board of Directors

Netcompany has as of 2020 reached the previous set target of having at least two female board members elected to the Board of Directors in Netcompany Group A/S prior to the end of 2022. In 2022 an additional female board member was elected to the Board of Directors and the ratio is now 50/50.

It is the ambition and target of Netcompany to continue to have no underrepresented genders on the Board of Directors and have at least two female board members on the Board of Directors ensuring Netcompany is above the Danish industry average.

Netcompany has also 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 underrepresented genders, and a new target will be set when applicable.

## 5 Follow-up and Reporting

Netcompany have local DE&I responsible persons who coordinate our efforts locally in Netcompany. The local DE&I responsible persons coordinate and report to our Group Communications department with the overall responsibility for Netcompany's DE&I efforts and who have quarterly meetings and continuously follows up on the progress on our DE&I ambitions and efforts. The Group Communications department aims to ensure that the DE&I efforts build traction across the company and is responsible for an annual review - and potentially revision - not only of progress, but also of initiatives and corresponding ambitions.

Netcompany also sits in on the Confederation of Danish Industry (DI)'s Special Committee for Diversity, which aims to tangible solutions to promote diversity and equality in companies.

The Executive Management is responsible for the Policy. The HR unit ensures that employment procedures are adhered to, and that managers have the prescribed dialogue about development and training. Further, HR records the trend in the proportion of diversity in our managerial positions, which will be reported to the Board of Directors once a year.

Netcompany reports on the policy annually and in accordance with applicable law and regulations. In the annual report, Netcompany will report on the applicable set targets for the underrepresented minorities in the Board of Directors, and where applicable, the Executive Management, and other applicable managerial positions for applicable entities in Netcompany. Furthermore, all DE&I activities and progress is monitored and reported on in Netcompany's annual ESG report.

## 6 Review and Amendment

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

## 7 Publication

The Policy is published on Netcompany's website.

Approved and adopted by the Board of Directors of Netcompany Group A/S on 17 December 2021.

Reviewed by the Board of Directors of Netcompany Group A/S on 16 December 2022.