

POLICY ON DIVERSITY AND EQUALITY

EUOPRIS ASA

(Adopted by the board on 28 January 2025)

The purpose of this policy is to describe how Europris defines and works with diversity and equality. Its operationalisation in the various areas is described in the policies for these areas and in possible procedures and routines where necessary. This policy has been formulated to support purposeful and efficient operation, reliable reporting and compliance with legislation and regulations. It applies to all employees and managers in Europris.

Definition of and attitude on diversity and equality

“Equality” means equal opportunities and rights for everyone, regardless of gender, pregnancy, parental leave for birth or adoption, caregiving responsibilities, ethnic, national, or political affiliation, religion, beliefs, disabilities, sexual orientation, gender identity, gender expression, age or combinations of these.

“Diversity” means the composition of variations.

Equality and diversity in Europris are about equal status, generosity and healthy values. All employees have the right to good and equitable working conditions. Discrimination or harassment on such grounds as gender, pregnancy, parental leave for birth or adoption, caregiving responsibilities, ethnic, national, or political affiliation, religion, beliefs, disabilities, sexual orientation, gender identity, gender expression, age or combinations of these is not acceptable.

Europris will work to maintain existing diversity in the organisation by promoting equality and preventing discrimination. Employees will be informed about and made aware of applicable policies. The group will work actively, purposefully and in a planned way in the following defined personnel areas:

- recruitment
- health and the working environment
- training and development
- pay and working conditions.

Recruitment

Europris will have an open and honest recruitment policy. Efforts will be made during recruitment processes to appoint the best qualified candidate to all advertised posts. This is best done by complying with the group’s recruitment routine and thereby ensuring a good and equitable process – without discrimination. Pregnant women and people on parental leave have special protection under the law, and this will be taken into account in the recruitment process.

Health and the working environment

Through health-promotion, prevention and rehabilitation measures, Europris will be a responsible employer and ensure that all personnel enjoy a good working environment. The group will make provision for a positive combination of work and private life, and for looking after employees in all phases of their lives. Its code of conduct specifies that personnel will take care of each other, and

that all employees must be treated equitably and with respect. Europris will safeguard the lives and health of its employees, treats this as a first priority, and views it as a shared responsibility.

Arrangement

“Arrangement” covers all measures implemented in connection with organising and executing work as well as shaping the workplace and the working environment in general. Europris will work to ensure that work is organised and arranged so that employees can remain in their job and be just as healthy when going home as when they arrived. This can be achieved through conducting regular risk and vulnerability analyses.

Arrangement applies for all workers, regardless of whether they face work-related challenges. Europris will work to customise for people with functional impairments and language challenges, for cultural and religious minorities and in the event of pregnancy, parental absence and other caregiving duties. The duty to arrange also applies regardless of whether it is required in the short or long term, and is independent of the worker’s age, position in the organisational hierarchy, and permanent or temporary employment.

Harassment and sexual harassment

Europris has some overriding ethical guidelines which apply to all employees. In this context, these emphasise that all employees, and others who represent the group, must behave with integrity and take responsibility for their own actions. They must act with integrity and honesty towards everyone they come into contact with, be loyal to Europris and always act in the group’s best interest. All employees must comply with applicable legislation, regulations, guidelines and instructions, and have zero tolerance for corruption and bribery, bullying and sexual harassment, money laundering, unregistered and illegal working, and breaches of human rights and discrimination.

Harassment can find expression in various ways in different environments and at different times. This means that actions which once conformed to social norms may be regarded as harassment at another time. Similarly, tolerance of what constitutes harassment can vary between different environments and cultures. Individual differences over what is tolerable will also exist.

Harassment occurs when one or more people are subjected repeatedly over time to negative behaviour by one or more others, but serious individual incidents can also be defined as harassment. An imbalance in power should normally be present, so that the person harassed finds it difficult to defend themselves.

Examples of behaviour which could constitute sexual harassment:

- unwanted comments on a person’s body
- unwanted sexual attentions
- sexual insinuations and comments – also on social media outside working hours
- sexually suggestive gestures, touching and fondling.

Examples of behaviour which could constitute bullying

- slandering and spreading rumours
- taking jobs from somebody
- unequal treatment rooted in bias
- ignoring a person in social settings at work, freezing them out and isolating them
- joking with somebody in a persistently derogatory manner
- denigrating somebody’s commitment to work and qualifications.

Europris has guidelines on submitting whistleblower reports concerning deviations and irregularities. These can be found in the code of conduct and the HSE handbook, one of the group’s internal

reference books. The HSE handbook also specifies routines for preventing and dealing with bullying. The latter term is used here as a collective expression for bullying, harassment, discrimination and insulting behaviour in the workplace. Bullying and all forms of harassment are also a separate topic in the annual Europris employee survey, and cases reported are dealt with immediately. In addition, the handbook provides routines for preventing and dealing with conflicts, and for combating violence and threats in the workplace.

Education and development

The Europris Academy is the group's umbrella organisation for expertise-building, training and management development, and will serve all sections of the workforce. Its purpose is to plan, implement and evaluate measures for ensuring that the organisation and individual employees have the necessary expertise to reach defined goals. Europris' expertise strategy can be divided into management development, expertise-building and training. The risk of discrimination and possible obstacles to equality are taken into account in the various sections, and measures are adopted if they are found to be needed.

Pay and working conditions

A pay policy has been established in Europris. This specifies that pay adjustments primarily follow collective agreements entered into with relevant trade unions. That ensures equal pay for work of equal value, and competitive conditions and criteria for objective wage assessments. Non-unionised employees are treated on par with unionised employees. The goal of the pay policy includes ensuring equal treatment in wage assessments for women and men when experience, qualification requirements, and job responsibilities are comparable. In determining whether two different positions constitute "work of equal value", factors such as competence, qualifications, responsibility, job performance, working conditions, and organisational placement are considered. Other criteria which may lay the basis for pay assessments are expertise-building, and the correction of unintended disparities. Criteria for wage assessment are to be applied in a gender-neutral manner.
