

TABLE OF CONTENTS

1	INTRODUCTION.....	2
2	VALUE STATEMENT	2
3	EQUAL OPPORTUNITIES	2
3.1	RECRUITMENT.....	2
3.2	PROMOTION.....	3
3.3	RETENTION.....	3
4	EQUAL PAY	3
5	PARENTAL LEAVE.....	3
6	DISCRIMINATION AND HARASSMENT	3
7	SUPPLIER EXPECTATIONS	4
8	GOAL SETTING AND REPORTING	4

Diversity and Inclusion Policy

This procedure applies to all employees in FPE Sontum, and it describes our policy regarding diversity, equality, and inclusion to ensure that we act in a manner which respects our colleagues, investors, business partners, shareholders, and communities.

WE BEHAVE AND COMPLY

HKK-12_E 01

Diversion and Inclusion Policy

1 INTRODUCTION

FPE Sontum is working strategically to improve diversity and inclusion. We believe that achieving balance in our organisation, not just in terms of gender but also in terms of age and background, is key to our company culture and our performance. This is a part of FPE Sontum's long-term strategy for our organisation and culture.

The organisation monitors and reports regularly on the status of diversity and inclusion to the group management and board of directors. We are conscious that changes must take place over time, supported by clear goals and various measures.

2 VALUE STATEMENT

- ❖ We will treat everyone with courtesy and respect, regardless of ethnicity, gender, national or social origin, disability, sexual orientation, religious belief or political opinions, or other status.
- ❖ Our goal is to recruit, develop and retain the best people based on merit and we want a creative, diverse, and inclusive working environment.
- ❖ We want our employees to perform to their full potential and to be recognized and rewarded fairly for their performance.
- ❖ We want to ensure that the workplace is safe and free from harassment, discrimination, and bullying. We will never tolerate any form of abuse or harassment of our colleagues or business partners.

3 EQUAL OPPORTUNITIES

Equal opportunities refer to fair, unbiased treatment in the workplace. This is equally important in the recruitment and promotion processes as in the everyday running of the company.

3.1 RECRUITMENT

We are committed to increasing talent diversity in the company via our recruitment processes. Extending the reach of our search allows us to provide equal employment opportunities for candidates based on merit, regardless of ethnicity, colour, religion, gender, pregnancy, sexual orientation, disability or any other class or status. All advertisement of available positions should present our diversity and inclusion approach. Any external recruitment partners are required to offer us a balanced short list of candidates when recruiting for available positions.

WE BEHAVE AND COMPLY

HKK-12_E 01

Diversion and Inclusion Policy

3.2 PROMOTION

We will promote based on the company's needs and the employee's performance, workplace conduct and potential.

We evaluate performance based on both personal skills, such as planning and organisation, problem analysis / resolution and communication and presentation skills, as well as technical skills such as industry knowledge, quality of work and understanding of ESG issues. This ensures that employees are equally treated and that decisions regarding promotions are based on demonstrated skills and achievements.

3.3 RETENTION

We believe that job satisfaction is the most important factor in retaining our employees. Job flexibility, benefits, good working relationships and career development are all contributing factors to this.

Employees are encouraged to suggest appropriate training themes or courses which can help them improve existing skills or acquire new ones.

4 EQUAL PAY

Our employees shall receive equal pay for work of equal value, regardless of gender, ethnicity, religion or belief, age, marital or civil status, pregnancy, sexual orientation, or disability. To monitor this, we have implemented annual equal pay mapping for all staff (including staff on maternity, paternity, or sick leave).

5 PARENTAL LEAVE

Our family leave policy is governed by the regulations in our countries of operation. The majority of our workforce is regulated by the Norwegian Working Environment Act whereby both parents take their quota of parental leave. It is a priority to facilitate parental leave for all employees concerned, while maintaining the possibility to build a career within FPE Sontum. Our company policy is that all employees, regardless of gender or job role, are required to take their allocated parental leave.

Each parent may also be entitled to additional unpaid leave in accordance with local legislation.

6 DISCRIMINATION AND HARASSMENT

We have zero tolerance for discrimination, and will always recruit, promote, train, and reward our employees based on their merit. Our Code of Conduct lays out our commitment to build a creative, diverse, and inclusive working environment, and highlights our zero tolerance for harassment, discrimination and bullying, our expectation of employees treating all colleagues with courtesy and respect, and our focus on qualifications, demonstrated skills and achievements in processes of promotion and reward.

WE BEHAVE AND COMPLY

HKK-12_E 01

Diversion and Inclusion Policy

Our Code of Conduct states that an FPE Sontum employee should never:

- ❖ Behave in a way that could reasonably be considered offensive, intimidating, discriminatory or insulting. Avoid abusive language or inappropriate jokes, such as jokes of a racial or sexual nature, in the workplace.
- ❖ Engage in any form of harassment. Harassment does not have to take place at work or involve a colleague to violate our Code.
- ❖ Humiliate, ridicule, or injure another person.
- ❖ Directly or indirectly discriminate a co-worker on the basis of ethnicity, gender, age, national or social origin, disability, sexual orientation, religious belief, or political opinions.
- ❖ Turn a blind eye to harassment or discrimination in the workplace. Voicing concerns or reporting incidents to management will never result in retaliation.

Our whistleblowing channel is available to all employees and provides the opportunity to report concerns anonymously and without retaliation, retribution, or harassment. All new employees are provided with an introduction to our Code of Conduct and other governing documents as part of their onboarding process. For more information, see our Whistleblower policy HKK-10_E.

7 SUPPLIER EXPECTATIONS

Our focus on diversity and inclusion extends to our selection of business partners, and our work with our portfolio companies. Our Business principles for suppliers and partners specifies that we require suppliers and partners to provide their employees with good, healthy and safe working environment, offering equal opportunities and respecting fundamental human rights, labour rights and union engagement.

8 GOAL SETTING AND REPORTING

People are the most important asset for FPE Sontum, and to get the best qualified employees, we need to tap from the entire resource pool of society. Diversity and inclusion are integral parts of our business agenda, we have implemented measures and are continuously focusing on diversity in our recruitment processes.

The organisation monitors and reports regularly on the status of diversity and inclusion to the group management and the board of directors.