



Diversity and Equal Opportunities

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Why

Storebrand's organisation and business should reflect our customers and our markets. Storebrand aims to be a good workplace for everyone, regardless of background. We strongly believe in building an agile organisation and a culture of trust, inclusion, and belonging. External independent sustainability analyses also show that companies focusing on diversity are more innovative and profitable. We depend on attracting the best talent to create a brighter future for our customers, employees, and society.

Goals and ambitions

We always strive to be an organisation characterised by inclusion and belonging. All Storebrand employees shall be treated equally, regardless of age, gender, disability, cultural background, religious beliefs, or sexual orientation, both in the recruitment processes and throughout their employment. We have zero tolerance for harassment, discrimination, and gender-based violence.

Our goal is greater diversity and better gender balance in senior positions in all parts of the Group. Measures include nominating an increased proportion of women to leadership development programs and in recruitment processes for management positions. For the Board of Storebrand ASA, the requirement is that the gender balance should be 50/50 between men and women.

We will contribute to UN Sustainable Development Goal 5, Gender equality, by promoting gender equality in the workplace. At Storebrand, we practice equal pay for equal work.

As of December 31 2022, the proportion of female managers was 38 per cent at management levels 1 to 4. In 2022, we initiated several measures to become a more inclusive and equal organisation. At the end of 2022, female leaders at levels 1 to 4 accounted for 39 per cent.

Approach

Storebrand works systematically to ensure diversity, inclusion, and equality through defined processes for recruitment, organisational changes, salary adjustments and management training. The Board follows up with the CEO on several sustainability indicators. In 2022, one of these was to strengthen gender equality.

We have a diversity committee with participation from the entire Group. In 2022, the committee focused on diversity, inclusion and belonging. In 2022, we continued to offer courses on inclusive leadership.

We work actively to achieve gender balance and diversity through targeted recruitment measures and strive to nominate an equal number of women and men to leadership positions and leadership development programmes. Candidates and employees should experience a transparent and inclusive recruitment process in internal and external processes.

On International Women's Day, March 8, we invited female leaders and subject matter experts to apply to our mentoring programme for women, which we introduced in 2021. Several managers participated in a reverse mentoring program, where the mentors were young students with minority backgrounds or international experience.



We work actively to achieve a gender balance through targeted recruitment initiatives and by nominating an equal number of women and men for leadership positions and leadership development programmes. Candidates and employees should experience a transparent and inclusive recruitment process.

We continued our partnership with the Women in Finance Charter, which we signed in 2021. Companies that sign commit to set internal goals for gender balance at the management level and among specialist positions have a dedicated manager responsible for following up on such plans, publishing status and follow-up regularly, and ensuring coherence between goal achievement and compensation.

Storebrand has participated in the tripartite Inclusive Working Life (IA) program since 2002. The program hypothesises that work promotes good health and well-being and that early, active intervention can prevent absenteeism. The Group's managers have established routines for inclusive follow-up of employees in the event of illness.

Storebrand has zero tolerance for harassment, discrimination, and other unwanted behaviour. In 2022, we introduced an additional module in our employee survey, asking questions about diversity and inclusion. We have emphasised our work on diversity and inclusion through our collaboration with the Catalysts Association. The focus in 2021 was on inclusive leadership, and we, therefore, wanted to continue this work in 2022 by offering a programme for the entire organisation. We received support from the Norwegian Directorate of Integration and Diversity (IMDI) to develop a course designed to increase awareness of diversity, inclusion and belonging. We also conducted focus groups with representatives from various parts of the organisation, discussing their experiences related to diversity and inclusion in Storebrand. The e-learning course is an offer to all employees in 2023.

Our work to study the link between psychological safety, diversity and inclusion continued in 2022. We used external and internal

communication channels during the year to put mental health and inclusion on the agenda, including the "Hobby Psychologist" external marketing campaign.

Throughout 2022, we continued to improve our recruitment and interview process to make it as digitally inclusive and gender-neutral as possible at every stage. The interview team shall consist of women and men, and there must be at least one female and one male candidate in the final round for leadership positions. The objective was to offer potential candidates the best and most inclusive journey and help Storebrand become an attractive and inclusive workplace.

We offer permanent employees paid parental leave beyond the statutory requirements of Norway and Sweden and pay 100 per cent salary during parental leave for all employees, regardless of gender.

Results

Ten women from different parts of the Group were selected to participate in FiftyFifty, a talent and leadership development programme for women, in 2022. Storebrand initiated the programme in cooperation with external partners as part of our 250th anniversary 2017. AFF, a leadership and organisational development consultancy in Norway, is now in charge of the programme. The participants from different companies in the programme collaborate to develop initiatives that promote equality for themselves, their companies, and society.

For the mentoring programme for women, we established ten mentor pairs across the Group with participants from Norway and Sweden.

As many as 120 leaders completed the course Storebrand Inclusive Management in 2021 and 2022, where leaders in groups of 15 participants attended six digital gatherings addressing how leaders can contribute to building an inclusive organisation. The course was developed based on a successful pilot in the spring of 2021.

The goal is to ensure at least 40% female participation in our leadership and talent development programmes. Among the participants in the Storebrand Academy, 50 per cent were women, and 50 per cent were men. The Front Management Programme for middle managers included 40 per cent women and 60 per cent men. The Sandbox program had an equal number of women and men, 10 of each gender. Among the Storebrand Future Impact program participants, 43% were women, and 57% were men.

In recruitment processes, we have worked to achieve more significant variation among Storebrand's representatives, with contributions from employees and managers with different professional experiences, cultural backgrounds, ages, and gender.

We have regularly provided an overview of the proportion of women at various management levels within Storebrand.

At the end of 2022, there was an average of 38 per cent of women with management responsibility, up from 37 per cent the previous

year. At management levels 1 to 4, 37 per cent of women were women at the end of 2022, compared to 39 per cent in 2021. At the end of 2022, the Group Executive Management comprised 56 per cent of women. Internal growth and development opportunities have a high priority. This year, when the Executive team replaced two members, two women recruited internally took their place. Five out of nine members (56 per cent) of Group Executive Management were women. Among the managers who reported directly to Group Executive Management, 42 per cent were women, and 50 per cent of the Board of Directors of Storebrand ASA were women. We reviewed all salary levels in 2022 as part of the annual salary adjustment process. The review showed lower average salaries among female employees than male employees. Several measures have been implemented to make wages more comparable and equal for women and men, including an annual salary review in cooperation with employee representatives.

When recruiting for management positions in 2022, we invited at least one female and one male candidate in the final round of interviews.

We reviewed the Group's salary levels as part of the wage adjustment process in 2021. The review showed slightly lower average earnings among female employees than male employees. The finding led to several measures, including an annual salary revision involving business unit leaders and executive managers. In addition, we introduced changes to our recruitment, development, and succession planning processes to make them more inclusive. We continued with these measures in 2022.

In our employee surveys in Peakon, gender equality and inclusion showed a steady score of 8.7 out of 10 throughout 2022. This exceeds the overall Peakon score for the company regarding employee engagement which was 8.5 for 2021. The target that Storebrand had set for employee engagement for 2022 was 8.5.

The average age of Storebrand Group employees was 43 years at the end of the year. The average tenure was ten years in Norway and nine years in Sweden.

Per December 31 2022, the Storebrand Group had 2161 employees.

There was a good gender balance among permanent employees in Norway and Sweden.

Sick leave has been low and stable for several years. In 2022, the absence rate was 2.5 per cent in our Norwegian operations and 1.6 per cent in our Swedish operations.

No physical injuries were reported in the Storebrand Group in 2022.

Flexible working hours

At Storebrand, we encourage a good work-life balance for all employees. After the pandemic outbreak in 2020, we facilitated increased flexibility in work hours and choice of workplace. What employees delivered was more important than where they performed their work. Still, we continued to value physical meetings and collaboration. Throughout 2021 and 2022, we

worked continuously to develop a hybrid working model. To support the teams' autonomy, flexibility, and ability to adapt and learn, we developed conversation tools to facilitate discussions about succeeding in our new workday. In 2022, 2e upgraded the office premises for interaction and concentration to make it more attractive to return to the office. We will design our future workplace to ensure and maintain a good balance between efficiency, interaction, creativity, competence development, and engagement.

Part-time working arrangements

Storebrand allows employees to request to work part-time. For all employees working on a part-time contract, the employee must justify the reason for such a choice, and the preferred option is to have employees on a full-time contract to ensure a healthy work-life balance. As such, the number of employees on part-time contracts is low.

Part-time positions are primarily related to employees' desire to work reduced for a shorter or longer period. Storebrand makes limited use of students who work part-time adapted to their study plans. We follow the proportion of part-time employees through data from our personnel system Workday and conversations with managers. This documentation shows that we do not have involuntary part-time work but only voluntary part-time in Storebrand.

Working from home arrangements

"People first, digital always" is Storebrand's organisational and employee development strategy. We aim to enable our organisation to adapt to continuous changes in an increasingly digitalised society while simultaneously delivering on ambitious business targets. In 2022, we further developed a flexible hybrid working model through a project called Future Storebrand. Each organisational unit and team adjusted its routines as needed throughout the year. Flexibility in terms of place of work contributed to efficiency and a sense of freedom among our employees. In 2022, following the pandemic, it was essential to resume physical collaboration further to strengthen company culture and a sense of belonging. Surveys showed that the degree of engagement among our employees will continue to increase in 2022.

At Storebrand, employees have flexible working hours and flexibility in choosing where they work. The working time consists of a period where everyone must be available either in the office or remotely (core time 09:00-15:00), and two periods on each side of this, where you can choose to a certain extent how long you want to be present (flexitime). The core time is much shorter than the average fixed working hours and falls within office hours. On the other hand, the flexitime periods will extend beyond office hours before and after this. When you start and stop work, flexitime is flexible and agreed upon with an employee's manager.

The employees can choose their place of work in close cooperation with the rest of their team and their manager. In 2021 we also introduced a team canvas to facilitate the discussion of what type of work and cooperation is best performed physically and digitally. We continued using this canvas in 2022 as well.

In 2022, we initiated experimentation and learning related to a hybrid working day. In addition, we upgraded our office spaces to strengthen agile work and collaboration opportunities across the organisation.

In 2022, we also offered a Healthy, Security and Environment Week, which we provided for the first time. During the week, we carried out several activities in the office and digitally on health, safety, and improving the work environment for all employees.

Childcare facilities or contributions

All employees at Storebrand have the right to up to 12 months of leave in conjunction with the birth of a child.

In Norway, all children one year or older have the right to a subsidised place in kindergarten for up to 10 hours per day. There is a maximum fee for attendance set at NOK 2500 or approximately USD290 per month, and parents have the right to childcare in the area in which they reside. As such, Storebrand (or other employers in Norway, for that matter) do not provide childcare facilities for their employees. Storebrand is known for its family-friendly policies and communicates how important it is that employees can take the necessary time with their children.

An employee who cares for a child has the right to paid leave for necessary supervision of the child when they are ill. The right to leave applies up to and including the calendar year in which the child reaches the age of 12. The right to leave in the event of a child and childminder's illness is, in principle, limited to 10 days per calendar year per employee. An employee who cares for more than two children is entitled to leave for up to 15 days per calendar year.

By following Norwegian law, Storebrand's employees can participate in a world-leading maternity, paternity and sick leave system. On top of this, employees at Storebrand can take ten days off with pay to care for close family members.

You can find many of the offerings above the applicable Norwegian law [here](#).

Breastfeeding facilities

Storebrand has relaxation rooms and breastfeeding facilities in all its offices. In addition, we have unisex restrooms with changing stations in our offices. Employees who breastfeed a child have the right to one hour for breastfeeding with full pay during the workday at Storebrand. This right is applicable until the employee decides not to breastfeed the child anymore. The only requirement to receive this benefit with full pay is that the employee must work 2/3 days or seven hours during the day. Employees working shorter hours have the right to unpaid leave for breastfeeding.

Paid maternity leave in excess of legally required minimum

Maternity and paternity leave, hereunder compensation, is highly regulated by law in Norway and administered through NAV – The Norwegian Labour and Welfare Administration. NAV covers parental benefits for yearly income up to six times the National Insurance Basic Amount (approximately 118 000 NOK). NAV will not cover parental benefits for annual income over six times the National Insurance basic amount (6G). Some employers cover the

exceeding amount for those earning more than 6G. Storebrand covers the exceeding amount and pays an employee 100% of their salary during both maternal and paternal leave. Employees on parental leave for at least five months shall receive a salary supplement upon re-entry. Employees placed on the salary ladder regulation receive one salary step.

Employees paid higher than the regulations shall receive a wage supplement of 1.3 per cent of the current annual basic salary. The same will apply to employees in the highest salary step of the regulation and who will be paid higher than the regulation due to the supplement. The supplement also applies to adoption. Paid paternity leave is in excess of the legally required minimum for maternal leave, and Storebrand pays the amount exceeding the minimum national level covered by NAV for paternal leave, meaning the employee receives 100% of his salary. Storebrand gives the father two weeks of paid leave in connection with the birth if he takes over the care of other minor children in the home or takes care of the mother and children after the birth. This is more than the legally required minimum and comes in addition to the so-called father's quota. In the case of twin birth, the father is entitled to another two weeks of paid leave. Father's right to such paid leave also applies to adoption. The time for termination of the leave must be agreed with and approved by the immediate manager.

Parents are entitled to an extended right to leave when they receive maternity benefits from the National Insurance Scheme and up to one year. Each parent is also entitled to up to one year's leave for each child - that is, for a total of three years. Extended parental leave assumes that the employee completes the remaining holiday before the unpaid leave begins. In regards to re-entry into a position after parental leave, the employee is entitled to re-enter their position unless, in the meantime, there have been organisational changes resulting in the position being dropped or changed. Usually, therefore, a substitute is employed during leave of absence of this kind. An employee will typically be entitled to a reduced position after the leave and can apply for 12 months of unpaid leave to care for children. However, this is available upon application.

Unadjusted pay gap

At Storebrand, we aim to provide equal pay for equal work. At the same time, we see that the unadjusted pay gap at Storebrand is at 84%. The average pay gap for the finance industry is 85%. The average unadjusted pay gap in Norway was at 87,9%% in 2022. Storebrand released its [Gender Equality Report 2022](#), where we went into great detail about our work to decrease the unadjusted pay gap.

Storebrand works purposefully to correct wage inequalities between women and men in the annual wage adjustment processes. Each manager has a salary pot to distribute to employees in the salary adjustment process. In addition, most employees are covered by a bonus scheme, which means that 20 per cent of employees can receive between 5 and 15 per cent of their salary as a bonus for extraordinary achievements.

Before the CEO approves the salary adjustment process, the People department thoroughly analyses the proposed salary increases and the bonus settings. This analysis is reviewed

together with the Executive Vice President of the area, with a particular focus on how we divide the wage pot by gender and age. The goals are, among other things, that women should at least have their distributed part of the wage pot, and an equal distribution of bonus payments between women and men is sought. Suppose the analyses show that this is not the case. In that case, we carry out corrective measures before the salary adjustment process goes to the approval of the CEO.

As discussed earlier, we are very close to equal pay for equal work concerning our database. We continue our work for gender equality in our annual salary adjustment process, and we put extra pressure on increasing the proportion of women in management and specialist positions. We substantiate this with measures such as the Mentor Program for Women and by nominating a 50/50 ratio of women and men to our leadership development programs. We will also encourage even greater internal mobility for women to positions characterised by a low proportion of women.

Decreasing the gender pay gap with workforce planning

Storebrand utilises Hay Grades and the Workday HR system for job categorisation, which in all positions in the Group are assessed concerning requirements for the work, complexity and degree of autonomy. Many companies use this system, which makes it possible to compare roles of equal value across corporate areas and with positions with the same Hay Grades in other companies. We assess that Hay Grade also is the best system for Storebrand to investigate whether there are pay differences between women and men for work tasks that, according to Hay Grades, are rated to have the same value. The Storebrand group is organised mainly in a matrix across the legal structure. This applies to men in some companies in the Group that do not have enough employees to compare wages for women and men. We have chosen to provide data for group areas to supplement the figures for the individual legal company. To compare, Hay Grades are used on three levels to compare the pay of women and men for equal work of equal value:

- All employees in the Group
- Employees in the individual corporate areas
- Employees employed in the various subsidiaries of the Group

To maintain anonymity in the figures, we display Hay Grades only for position levels where at least five employees are represented for each gender. This data is used in the yearly salary review to help determine if there are gaps that need to be closed.

Generally, the Peakon People Analytics tool (a part of Workday) is also used to monitor employee engagement levels and evaluate leadership performance consistently. Tracking this data allows for appropriate interactions to be implemented where needed. As a result, the company has always seen increasing retention rates driven by this higher employee engagement. As a result, the company has continually maintained industry average turnover rates.

Yearly salary review

Storebrand works purposefully to correct wage bias between women and men in the annual pay adjustment processes. In the pay adjustment process, each manager has a total salary

allowance for their employees. In addition, most employees can receive a bonus, which means that 20 per cent of employees can receive between 5 and 15 per cent of their salary as a bonus for extraordinary performance.

When the manager has set up pay increases and any bonuses for his employees, the recommendation is reviewed by the manager at the next level. The executive vice presidents for the individual corporate areas have complete insight into the assessments made at all management levels. The Workday HR system is used as a technical aid in the pay adjustment processes, and this ensures good structure and overview while at the same time documenting the annual processes and protecting privacy. Before the CEO approves the pay adjustment process, the People department thoroughly analyses the proposed pay increases and bonus settings. This analysis is reviewed with the area's executive vice president, focusing on how the salary pot is distributed by gender and age. Among other things, the objectives are that women should have at least their allocated share of the salary pot and that an equal distribution of bonus payments between women and men is sought. Suppose the analyses show that this is not the case. In that case, corrective measures are implemented before the pay adjustment process goes to the approval of the CEO. In 2022, women's pay mass accounted for 37 per cent of the Group's total salary pool, while women were allocated 40 per cent of the salary pot. This means that a skewed distribution was made in favour of women, which helped reduce the unadjusted salary gap between women and men.

Before each pay adjustment process, the union representatives receive salary statistics for their members' wage developments and anonymised wage statistics for the entire company. Before determining the pay adjustment processes each year, discussion meetings are held with the union representatives about the pay framework, and input from the union representatives is an essential part of the decision basis. Following the salary processes, the union representatives receive a review of the outcome of the pay processes for their members in particular and for the company in general. In these reviews, discussing measures that may contribute to further correcting wage bias between women and men is vital.

Workforce planning to increase inclusion

We are actively working to achieve gender balance and diversity through targeted recruitment initiatives and by nominating an equal number of women and men for leadership positions and leadership development programmes. Candidates and employees must experience a transparent and inclusive recruitment process. We follow the rate of inclusion closely by utilising our HR system Workday. All CVs are received, evaluated, and screened in the Workday system. We follow the gender balance daily in our dashboard of essential statistics in Workday. Here we also follow employee turnover, internal mobility, gender balance, age composition, and the number of hires in each department.

In our bi-annual People Review, we meet with the leadership groups in all our divisions on management level 3 below the Executive team to review vital statistics concerning sick leave, turnover, recruitment, and retention. We use the data from Workday to discuss the status and plan for the workforce changes ahead.

In our yearly salary review, we actively use the Workday HR system to look at the past three years' statistics and plan recruitment further ahead. We also use the system for job categorisation and to develop career planning methods for our employees. We provide a gender equality report where our employees can see the salary for their position and compare it to other employees in the same judicial company as they are in. Storebrand uses the Hay grade system for categorisation; employees can see how their salaries compare to other employees. This transparent system encourages and increases equal pay for equal work and ensures that employees can verify if their income is correct.

We identify critical talents as part of the yearly salary process. They can receive an additional discretionary bonus for extraordinary results and behaviour.

The Workday HR system also documents development needs and follows up on goals. Here leaders use the check-in function to record their talks and enter and follow up on learning and value-creation goals. We have started working more systematically on using Workday for this in 2022 to increase inclusion and a culture of learning further.

Goals for diversity and inclusion

The goal is to ensure a 50/50 gender balance in participation in our leadership and talent development programs. Among the Storebrand Academy 2022 participants, 50 per cent were women, and 50 per cent were men. In the Front management program for middle managers, there were 40 per cent women and 60 per cent men. The Sandbox program included an equal number of women and men, 20 total. Among the Storebrand Future Impact graduate program participants, 43 per cent were women, and 57 per cent were men in 2022. Ten women from different parts of the Group started 2021 on the talent and leadership development programme for women, FiftyFifty. The programme consists of participants from many companies who collaborate to develop measures that promote gender equality for themselves, their companies, and society. For the mentoring programme for women, we matched ten mentoring pairs across the Group that completed the program during the year.

Internal Hiring

Storebrand has an internal policy that all jobs will be posted for five days internally before we go externally. We developed this policy with the employee representatives to ensure we consider our internal candidates before reaching out externally.

Based on the results from 2022, we now see an internal mobility of approximately 25%. Moving forward, we will collect this data every year.

Norwegian legislation on diversity data and privacy protection

The processing of personal data requires a legal basis (legal basis), i.e. that it is a law (e.g. the EU Privacy Regulation, the Personal Data Act, the Universities and University Colleges Act) or regulations that allow the processing in question.

One of the principles of the EU Privacy Regulation, Article 6 (1), must be met to process personal data. The basis can be consent or one of the other alternatives.

At least one of the following conditions must be met:

- The data subject has given consent (which must be documented) to the processing of his personal data for one or more specific purposes
- The processing is necessary to – fulfil an agreement with the registered – protect the vital interests of the data subject or another natural person (life and health) – fulfil a legal obligation imposed on the data controller – perform a task in the public interest – exercise public authority as set on the controller 4 The last three alternatives also require a supplementary basis in national law.

Provisions in the Personal Data Act or the Universities and University Colleges Act, or other laws may be such a supplementary legal basis. Suppose sensitive personal data (health data, information on ethnicity, political opinion, and similar data points) are to be processed. In that case, it is also required that one of the points in Article 9 (2) is met. Article 6 (1) (f) allows the processing of personal data if the entity processing the personal data has a legitimate interest in the processing in question and the interests of the data subject's privacy do not exceed this interest. As a rule of thumb, the provision will not be used as a basis for processing personal data about students as it does not apply to processing carried out by public authorities as part of the performance of their tasks. The provision can be a basis for processing personal data about employees. Moreover, Article 9 of the Norwegian Act on processing personal data defines several categories of personal information that can only be processed if one or more specific requirements are met.

The categories are:

- information on racial or ethnic origin
- information on political opinion
- information about religion
- information on the philosophical belief
- information on union membership
- genetic information
- biometric data to uniquely identify someone
- health information
- information about sexual relationships
- information about sexual orientation

In Norway, we do not have a law that explicitly allows employers to obtain sensitive information as defined above, nor is it something Statistics Norway does. Storebrand, as an employer, can not say that there are special reasons for life and health or other laws that render these types of data significant to us. All use of personal data must have a legal basis to be processed. This means the company must have identified a solid foundation for processing before the data gathering. We do not find that Storebrand has specific reasons to gather information on ethnicity, race, sexual orientation, or the like of our employees and therefore do not gather or process this information.

Discrimination and Harassment

In Storebrand, we demonstrate tolerance for employees' and other stakeholders' attitudes and opinions. No one shall discriminate or harass their colleagues, partners, customers or other stakeholders. All those who feel discriminated against or harassed shall be taken seriously. We have zero tolerance for

discrimination – both sexual and non-sexual harassment.

In connection with service assignments, for example, on business trips, employees shall not behave in a manner that can violate human dignity. This includes the purchase of sexual services.

In 2022, Storebrand received one report of incidents of discrimination, sexual harassment and non-sexual harassment.

Freedom of association

Freedom of association is deeply rooted in the culture of workers and employers in the Nordics. At Storebrand, 100% of our employees in Norway and 100% of our employees in Sweden are covered by collective bargaining agreements. Moreover, a majority of our employees are also members of independent trade unions, such as Finansförbundet (the trade union for people working in finance) Storebrand is a member of the employer union Finance Norway. Finance Norway is the counterpart for the finance industry's collective agreements. Finance Norway represents the industry and employers' interests in the annual central tariff negotiations with the Finance Federation and the Norwegian Federation of Trade Unions (LO Norway). Storebrand is part of Finance Norway's main tariff agreement (Hovedavtalen). It is explicitly stated in our standard employee contracts that Storebrand follows the Main Agreement (Hovedavtalen) and the Central agreement (Sentralavtalen) when it comes to the employees' rights regarding salary (including minimum wage), overtime payment, severance pay, worker participation, etc. Storebrand's Swedish subsidiary, SPP, is a member of the Employers' Association of the Swedish Banking Institutions (BAO). BAO supports employers in negotiations with employee organisations to promote a good relationship between employers and their employees and to secure the common interests of the partners as employers. SPP are part of the Collective agreement between BAO and the Financial Sector Union of Sweden (Finansförbundet) and the Swedish Confederation of Professional Associations (Saco). The Collective agreement regulates pay and general terms and conditions of employment.

Reporting of discrimination and harassment

- **To whom:** There are several ways to notify. Notification should be made internally to the nearest manager unless the report includes the closest manager. Internally, you can tell Storebrand's HR function (People), the compliance function or safety delegates/ elected representatives. The person who receives a notification of misconduct in the enterprise shall give written feedback to the whistleblower that this has been received. All notifications received in internal and external channels should forward to Group Compliance.

Storebrand has an external whistleblowing channel. Links to this channel are available in several places on Storebrand's intranet pages. Storebrand's compliance function is informed of the notifications sent via external channels

- **How:** Notification can be made orally or in writing.
- **Notification processing:** Reprehensible matters should, as far as possible, be discussed with the manager. If, within a reasonable deadline, a satisfactory solution cannot be found, the immediate manager should be notified. When the case has been processed, the person concerned shall be notified of the outcome. Suppose the conclusion is that nothing reprehensible has happened. In that case, the person must be notified that the case has been closed. Knowing that baseless accusations have been brought can be a considerable burden. People Business Partners have a special responsibility to care for people subject to unfounded criticism.

Please see section 5 in our [Code of Conduct](#).



