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		<b>APPROVED</b>	<b>LAST UPDATE</b>
	Accunia Group Policy	BoD	December 2023

## 1. INTRODUCTION AND SCOPE

The purpose of this policy is (i) to ensure that the Accunia Group (“Accunia”) is able to attract and retain competent and diversified staff members in order to maintain the highest professional and ethical standards, and (ii) to support Sustainable Development Goals no. 5 (Gender equality), see section 2, and no. 8 (Decent work and economic growth), cf. section 3.

Accunia believes:

- that no (potential) employee of Accunia should be harassed or discriminated against (or treated less favourably) because of race, colour, religion, sex (including pregnancy, sexual orientation, or gender identity), national origin, disability, age, or genetic make-up.
- that diversity creates an inspiring and innovative professional environment, and Accunia is committed to maintain a high degree of diversity in its staff.

Accunia is a very diverse company across nationalities, languages, and cultures – with its staff currently representing 7 different nationalities across 38 employees.

Accunia recognise that it may need to act in a discriminatory manner under certain circumstances, due to applicable law and regulation.

## 2. RECRUITMENT

When Accunia is recruiting, the following factors are central, taking the position in question into consideration:

- Strong cognitive abilities
- A personality that adds to the group culture
- A proven track record, within one’s career or educationally as applicable
- Relevant job knowledge, competencies, and experience as applicable

Additionally, Accunia is focused on being a diverse and non-discriminatory organisation. The recruiter needs to have this in mind when recruiting for a given position. No discrimination due to the factors mentioned in Section 1 of this policy is accepted in the recruitment process.

Specifically, the financial sector, including Accunia, has historically been biased towards the male gender. Accunia actively seeks to diminish this bias.

Accunia is a very ethnically diverse organisation including a large proportion of ex-pats. Accunia believes that the ethnical diversity is a strength for the organisation that Accunia wants to retain and expand upon.

To retain knowledge and maximise human potential of employees, further to the below points in section 3, Accunia believes that internal recruitment is preferable to external recruitment when possible.

### 3. EMPLOYMENT

Accunia seeks to retain and develop its employees whenever possible. In order to do this Accunia strives to provide each employee with:

- The possibility to develop and deepen employees' professional competences
- An attractive and relevant future career path
- A flexible work environment
- A relevant remuneration package

Accunia would specifically like its employees to be able to combine a healthy family life with a demanding professional career. Flexibility is thus prioritized as much as possible.

No discrimination due to the factors mentioned in Section 1 of this policy is accepted in a staff member's career in Accunia.

### 4. REPORTING OF DISCRIMINATORY BEHAVIOUR

Accunia does not accept discriminatory behaviour neither by nor against its employees.

All employees are strongly encouraged to report discriminatory behaviour. All reporting is treated confidentially<sup>1</sup> and can be directed in confidentiality<sup>1</sup> to:

Name	Mail	Phone
Klaus Runge	<a href="mailto:klaus.runge@accunia.com">klaus.runge@accunia.com</a>	40115005
Peter Aandahl, Chairman	<a href="mailto:paa@aandahl.dk">paa@aandahl.dk</a>	--

### 5. REVIEW AND APPROVAL

This policy and updates hereof must be presented to the Board of Directors at least on an annual basis for approval.

Approved by the board of directors, 4 December 2023:

Peter Aandahl, Chairman

Carsten Gomard

Jørgen Clausen

Niels-Ulrik Mousten

Allan Gross-Nielsen

Henrik Hoffmann

Accepted by the management, 4 December 2023:

Henrik Nordby, CEO

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Footnote 1 – Accunia reserves the right, confidentiality notwithstanding, to proceed to disciplinary action or legal action based on a report of discriminatory behaviour. Such actions will always be handled in co-operation with the company's lawyer.