

20 September 2021

# Declaration of Anti-discrimination

**Wikborg Rein values and wishes to contribute to diversity. We do not accept any form of discrimination, bullying or harassment (including sexual harassment) at our work place. All co-workers in Wikborg Rein are committed to contributing to a good and professional working environment, and all of our co-workers must treat each other with respect.**

## **1 DISCRIMINATION AND EQUALITY**

**Discrimination based on gender, age, pregnancy, parental leave (including for adoption), care duties, the nature of the employment being part-time or temporary, ethnicity, religion, beliefs, political views, sexual orientation, gender identity and gender expression, or disability, is prohibited.**

In connection with our efforts to prevent discrimination, bullying or harassment in the workplace, our starting point is always equality and respecting differences. Equality means that all people have equal value, equal opportunities and equal rights, irrespective of any of the factors (potential discrimination grounds) mentioned above.

Discrimination is when someone is treated worse than others for no justifiable reason. Direct discrimination means that a person is treated worse than others based on one of the grounds mentioned above. Indirect discrimination is when seemingly neutral actions, such as general rules or requirements, have negative consequences for employees due to one of the grounds mentioned above.

Discrimination which is necessary to achieve a justifiable purpose, and which is not disproportionately invasive to the one or those who are treated differently is not contrary to the prohibition against discrimination. What constitutes a disproportionate intervention must be decided based on our business and business purposes, the co-workers' professions and the tasks performed.

Positive action is differential treatment aimed at promoting equality and equal opportunities. Such positive action is permissible provided it is appropriate for promoting the spirit and purpose of anti-discrimination legislation, and that it is proportionate to the intended purpose of the measures and the invasiveness of the differential treatment for the one or those who are put in a detrimental position as a consequence of the discrimination. Positive action shall cease when the intended purpose has been achieved.

## **2 BULLYING, HARASSMENT AND SEXUAL HARASSMENT**

Harassment is an act or statement whose purpose or effect is to be offensive, intimidating, hostile, degrading or humiliating. Inaction (omissions) can also be harassment.

Sexual harassment is any form of unwanted sexual attention whose purpose or effect is to be offensive, intimidating, hostile, degrading, humiliating or distressing. Sexual harassment can be physical (groping, hugging, kissing), verbal (sexual insinuations or comments about body or

appearance) or non-verbal and without physical contact (suggestive looks or body language, indecent exposure).

Keep in mind that an action (or inaction) can be harassment or sexual harassment even if harassment was not intended. It is sufficient that the effect of the action is subjectively perceived, and can objectively be considered, to be harassment.

### **3 WHISTLEBLOWING**

Discrimination, bullying or harassment shall be reported in accordance with the applicable routines for whistleblowing in Wikborg Rein.

### **4 WORK TO PROMOTE EQUALITY AND PREVENT DISCRIMINATION**

In accordance with the requirements of the Norwegian Equality and Anti-Discrimination Act, Wikborg Rein works actively to promote gender equality and prevent discrimination in a work context. Our efforts to promote equality and prevent discrimination are defined as strategically important and have always been an integral part of how we work at Wikborg Rein. This work, which is further described in our equality statement, in summary consists of the following:

- HR have overall responsibility for this area, and cooperate closely with employee representatives and the Working Environment Committee (AMU) to promote proposals and initiatives to ensure diversity, equality and gender balance.
- Our whistleblowing routines ensure safe channels for all employees and the possibility to report.
- We are Eco-Lighthouse Certified. Among other things, the certification sets requirements for good routines for follow-up of employees and the working environment.
- We focus on gender balance and diversity in all aspects of our recruitment processes. Equality and possible discrimination are important factors in promotion considerations.
- We conduct regular employee surveys to map the working environment in Wikborg Rein, including in respect of gender equality and discrimination.