



DIVERSITY AND HARASSMENT POLICY

STORM CAPITAL MANAGEMENT AS

2021



History

Version	Release Date	Description	Amended by	Reviewed by	Approved by the Board on
V1	03/2021	Initial policy	TA	MSM	

1. Introduction

This **Diversity and Harassment Policy** describes and aims to clarify the values and standard of Storm Capital Management's ("SCM") conduct when it comes to the areas of diversity and harassment.

SCM recognises and celebrates the value and contribution each individual brings to our workplace and appreciates the value of attracting and retaining employees from different backgrounds. SCM is committed to creating a working environment that is fair and flexible, promotes personal and professional growth, and benefits from the capabilities of its diverse workforce.

We recognise that diversity in our workforce contributes to our business success and benefits our investors, customers, employees, and shareholders. Leveraging diversity in our workplace delivers a strong competitive advantage.

Our aim is to ensure that our business policies, procedures, and behaviours promote diversity and inclusion, create an environment where individual differences are valued.

2. Scope

This policy applies to all SCM Directors, employees, and service providers for outsourced functions.

3. Responsibilities

The SCM Board has responsibility for its initial approval and any amendments made to it.

4. Policy

It is an understanding that each individual is unique, and recognition of our individual differences. These differences can include skills, experience, thought, gender, age, disability, ethnicity, cultural or socio-economic background, religion, sexual orientation, political or ideological beliefs as well as other dimensions such as lifestyle and family responsibilities.

At SCM we are committed to:

- > a workplace which is free from discrimination, harassment, bullying, victimisation, and vilification;
- > treating investors, customers, employees, and service providers fairly and with respect;
- > a workplace culture that is inclusive and embraces individual differences;
- > equal employment opportunities based on ability, performance, and potential;
- > awareness in all staff of their rights and responsibilities with regards to fairness, equity, and respect for all aspects of diversity;
- > flexible work practices and policies to support employees and their changing needs;
- > attraction, retention, and development of a diverse range of talented people; and
- > equitable frameworks and policies, processes, and practices that limit potential unconscious bias.

5. Diversity programs and practices

To achieve a diverse and inclusive environment, we seek to implement the Diversity and Harassment Policy in the various aspects of our operations, including:

Recruitment, Selection & Promotion. We recognise the value of recruiting, selecting, and promoting employees with different backgrounds, knowledge, and experience. Our recruitment and selection processes identify candidates with the most suitable knowledge, skills, experience, and personal values and as an equal opportunity employer, the recruitment processes are designed to promote equality. Testing, independent evaluations and behavioural interviewing are used to promote equitable and unbiased selection and promotion decisions.

- > **Remuneration.** Our role grading and remuneration review actively consider equity in both grading and remuneration, and we will seek to resolve any identified gaps.
- > **Career development and performance.** Employees are encouraged to develop and progress their careers through opportunities that build capability and all employees are supported to participate in career development conversations. We encourage and reward excellence and performance is measured based on agreed goals to promote equity and remove bias.
- > **Talent and succession planning.** Talent and succession planning are core practices within the organisation. Talented individuals are identified based on their performance and potential. The talent and succession process is used to identify candidates for leadership development programs and gender diversity is a key consideration during candidate selection.
- > **Policies and procedures training.** All employees are required to review SCM's suite of Policies and Procedures, including the Diversity and Harassment Policy. This review raises awareness and encourages behaviour that supports a work environment free from discrimination and harassment.
- > **Flexibility.** Our Diversity and Harassment Policy provides an equitable framework that enables employees to apply for flexible work arrangements, particularly employees with parenting, family, carer, cultural and religious commitments. To ensure flexibility is implemented equitably, all managers are encouraged to support team members who require flexible working arrangements.
- > **Gender diversity.** Gender equality at all levels of the organisation is a key component of our Diversity and Harassment Policy. Increasing the representation of women at senior levels of management and at the Board level will remain one of our strategic priorities on an ongoing basis.
- > **Whistleblower Protection.** Discrimination and harassment are not acceptable, and any person involved in such an incident with an SCM employee shall be able to report such incident without fear of threats or retaliation.

6. Definitions

Diversity. Diversity is acknowledging understanding, accepting, valuing, and celebrating differences among people. Diversity occurs in areas such as gender, race, religion, sexual preferences, age impairment or disability, family responsibilities, marital status, and status as a parent or carer. However, it is not limited to these examples. Diversity also exists between individuals in the roles they perform, where they are from and their socio-economic status.

Harassment SCM is committed to providing a safe work environment that is free from harassment of any kind. Harassment is defined as conduct that interferes with a person's work performance or unwanted behaviour that a person finds offensive, intimidating, or humiliating. Harassment can be based on age, gender,

ability, ethnicity, religion, culture, or sexual orientation and may include, but is not limited to spoken or written words, physical gestures, jokes, and images.

Reporting and Questions

SCM will promptly take appropriate action to address any form of harassment or discrimination that is brought to our attention. To confidentially report an incident involving an SCM employee, please contact andreas.lowzow@schjodt.no

7. References

The Diversity and Harassment Policy is supported by various other policies, including:

- > Code of Conduct (*No.: Instrukssamling*)