

DIVERSITY EQUITY and INCLUSION POLICY

Adapteo.

Diversity, Equity and Inclusion policy

Approved by the Adapteo Board of Directors (“Board”)
14 December 2023

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1 Introduction

- 1.1 Adapteo is committed to fostering a diverse, equitable, and inclusive workplace that values and respects the unique perspectives, talents, and contributions of every individual. Our commitment to Diversity, Equity and Inclusion is not just a matter of social responsibility; it is a strategic imperative that drives our success. By embracing diversity and fostering an inclusive workplace, we attract and retain exceptional talent, enhance our understanding of the communities we serve, and deliver innovative solutions that make a positive impact on society.
- 1.2 This policy outlines our commitment to promoting Diversity, Equity, and Inclusion (DEI) across all aspects of our operations.
- 1.3 This policy will be reviewed at least annually by the Group HR department and may be updated or changed accordingly. You should always refer to the most up-to-date version.

2 Scope

- 2.1 This policy applies to all Adapteo Group subsidiary companies, business units, management and employees, regardless of their employment status, contract type or location. In addition, this policy is also applicable to all contractors, subcontractors' vendors and other third parties who perform work and/or services on behalf of Adapteo.

3 Definitions

- 3.1 **Diversity:** refers to the variety of human experiences, backgrounds, and perspectives that exist within our workforce, recognizing that each human being is unique. This includes but is not limited to diversity of sex, gender identity and expression, race, ethnicity, sexual orientation, disability, religion or other beliefs.
- 3.2 **Equity:** aims at ensuring fair treatment, opportunities, and advancement for all employees, irrespective of their background or individual characteristics. Equity further prevents individuals from being discriminated against or treated differently due to personality traits or physical appearance.
- 3.3 **Inclusion:** the creation of a workplace where all employees feel valued, respected, and empowered to contribute their best. It describes the practice of including and accommodating people, especially those groups who have been historically marginalized, embracing, enabling and encouraging people to be their true authentic self.

4 Our commitment to Diversity, Equity and Inclusion

- 4.1 We recognize that a diverse workforce fosters innovation, creativity, and problem-solving, leading to better business outcomes and societal impact. As a company that delivers essential societal solutions such as schools, pre-schools, and elderly care facilities, we believe it is imperative to mirror the diversity of the communities we serve. Operating in a traditionally male dominated industry we recognize our responsibility to drive the DEI-agenda both within Adapteo as a company but also for the industry as a whole. We are convinced that our commitment to building a diverse workforce and providing an inclusive and equitable workplace not only serves the greater good of society, it also provides a competitive commercial edge for Adapteo.
- 4.2 At Adapteo, we are committed to:
 - a) **Building a workforce that reflects the rich diversity of our society.** We actively seek to attract, hire, and retain individuals from all backgrounds, ensuring that our team represents the diverse communities in which we operate. We work actively to reduce and eliminate unconscious bias in recruitment processes and promotion considerations to actively drive diverse representation on the basis of performance, competence and potential.
 - b) **Promote and increase gender balance across our operations.** Adapteo operates in a male dominated industry, and we actively work to increase the share of female representation in all parts of our operations. In addition, we are committed to ensure a balanced gender representation (minimum of 40% women and a minimum of 40% men) in our Group Management Team by 2027 and in across all management teams by 2028.

- c) **Creating a workplace where every individual feels valued, respected, and empowered to contribute their unique talents.** We foster a culture of inclusivity, where employees feel comfortable being themselves and bringing their authentic perspectives to the table. At Adapteo we welcome different perspectives as it broadens our collective sight and enables us to explore new and innovative solutions.
- d) **Providing equal opportunities for all employees, regardless of their individual characteristics.** Adapteo is an equal opportunity employer. All aspects of employment including hiring, promotion, development, remuneration or discipline are solely based on performance, competence, potential and business needs.
- e) **Eliminating all forms of discrimination and harassment.** We have a zero-tolerance policy for discrimination and harassment, and we provide comprehensive training and support to prevent and address such issues.
- f) **Fostering a culture of open communication and collaboration.** We encourage open dialogue, constructive feedback, and a collaborative spirit, where everyone is heard and valued.

5 Who is responsible for this policy?

- 5.1 The Chief HR Officer (CHRO) is the owner of this document and oversees that other policies and other operational guidelines are aligned with this document and shall propose any necessary changes to them.
- 5.2 Any changes to this policy shall be approved by the Board.
- 5.3 The Group Management Team have primary and day-to-day responsibility for overseeing this policy, setting the tone, modelling inclusive behaviours, and ensuring DEI principles are integrated to all aspects of the business, and ensuring that those subject to it receive adequate training.
- 5.4 Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy.
- 5.5 You are ultimately responsible for reading, understanding and complying with this policy. If you do not understand anything in this policy, speak to your line manager or to the Group HR Department to ensure that you are clear about our commitments to DEI.

6 Expectations and raising concerns

- 6.1 As employees and contractors of Adapteo, we each play a critical role in upholding our company's commitment to diversity, equity, and inclusion (DEI). This includes familiarizing ourselves with Adapteo's global position on DEI, as outlined in this policy, and actively supporting and understanding the differences that enrich our workplace.
- 6.2 All employees and contractors are expected to take ownership of their individual actions, so that collectively we create a workplace that embraces diversity, fosters inclusivity, and empowers all individuals to thrive. Together, we cultivate a culture where everyone feels valued, respected, and empowered to make a meaningful difference.
- 6.3 In alignment with the principles outlined in this policy, all employees and contractors of Adapteo are expected to voice any concerns related to the policy or its implementation. This includes calling out discriminatory behaviour should you witness it. More information relating to employee behaviour can be found in Adapteo's Code of Conduct.
- 6.4 If you suspect that someone – inside or outside Adapteo – have been subject to discrimination, bullying, or harassment in any form, you are encouraged to immediately report the incident via one of the reporting channels set out in the Whistleblowing Policy.
- 6.5 Reports may be made anonymously via the third party operated web service: <https://report.whistleb.com/adapteo>. Anonymous reports will be taken seriously but may be harder to investigate. If you do decide to report anonymously, it is therefore important that you provide as much specific information as possible to ensure that your report can be appropriately investigated, and any issues can be addressed.

7 No Retaliation

- 7.1 Individuals who experience having been subject any form of discrimination or harassment, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We are committed to ensuring no one suffers any detrimental treatment as a result of voicing, raising or reporting genuine concerns in good faith.
- 7.2 Detrimental treatment includes dismissal, disciplinary action, threats, bullying, harassment and other unfavourable treatment. If you believe that you have suffered any such treatment as a result of raising or reporting genuine concerns in good faith, you should immediately inform your line manager or HR representative, the Chief HR Officer, or the CEO, or the Chairman of the Board.

8 Training and Communication

- 8.1 All employees and contractors will be provided with a copy of this policy. Employees and contractors will also be required to attend training on this policy and will receive periodic refresher training and / or additional training as necessary.
- 8.2 Other steps will be taken as appropriate to communicate this commitment to suppliers, customers and other third parties.
- 8.3 This commitment, and in particular our zero-tolerance approach to discrimination and harassment, must be explicitly drawn to the attention of Business Partners engaged by us.

9 Breaches of this Policy

- 9.1 Any employee, contractor or business partner of Adapteo who breaches this policy will be subject to appropriate disciplinary action, up to and including dismissal or termination of engagement.
- 9.2 If serious illegality is suspected or identified, law enforcement authorities may be informed.

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