



Diversity & Inclusion Policy



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1. Background

Nepa holds that all employees are equally valued. The purpose is to counteract discrimination against employees on the grounds of gender, gender identity or expression, ethnic affiliation, religion or other beliefs, disability, sexual orientation and age. Employers are obligated to conduct systematic, active and goal-oriented work to promote equal rights and opportunities in working life. Furthermore, Employers have an obligation to investigate and act when an employee is exposed to harassment or sexual harassment.

Employers shall conduct preventive and active measures* in the following areas: working conditions, provisions and practices regarding pay and other terms of employment, recruitment and promotion, education and training and other skills development and possibilities to reconcile gainful employment and parenthood.

Employers shall also promote gender balance in different types of work – including in management positions, carry out an annual salary audit as well as follow up and evaluate guidelines and routines to prevent harassment, sexual harassment and reprisals.

The work should be conducted systematically and be documented.

2. Nepa's principles

Our vision is that all employees within Nepa have the same opportunities, rights, and obligations. All employees are of equal value and should be treated based on their individual conditions and opportunities, irrespective of gender, gender identity or expression, ethnic affiliation, religion or other beliefs, disability, sexual orientation, or age. Nepa stands for a supportive and respectful workplace that attracts and retains a diverse and talented workforce. We promote a non-discriminatory and equitable recruitment process for all candidates.

We work to ensure that all employees have equal rights and opportunities in the workplace in terms of working conditions, provisions and practices regarding pay and other terms of employment, recruitment and promotion, education and training, as well as other skills development opportunities and the possibility to reconcile gainful employment with parenthood.

Nepa does not accept that employees are subjected to any form of harassment or sexual harassment; all these forms of abuse are strictly prohibited in the workplace. All managers shall have knowledge about how harassment and sexual harassment can be prevented. All employees should be aware of where they can turn if they have been exposed to any form of harassment or offensive treatment.

3. Definitions

There are different forms of discrimination, *including direct discrimination, indirect discrimination, inadequate accessibility, harassment (both verbal and physical), sexual harassment, instruction to discriminate*. Discrimination can be both intentional and unintentional, meaning it can occur consciously or unconsciously. It does not require intent to be classified as discrimination.

3.1 DIRECT DISCRIMINATION

When someone is disadvantaged by being treated less favourably than another person has been, is being, or would be treated in a comparable situation, and this disadvantage is connected to gender, gender identity or expression, ethnic affiliation, religion or other belief, disability, sexual orientation, or age.

3.2 INDIRECT DISCRIMINATION

Indirect discrimination occurs when someone is disadvantaged through the application of a provision, criterion, or practice that appears neutral but may particularly disadvantage individuals of a certain gender, gender identity or expression, ethnic affiliation, religion or other belief, disability, sexual orientation, or age, unless the provision, criterion, or practice has a legitimate aim and the means used are appropriate and necessary to achieve that aim.

3.3 INADEQUATE ACCESSIBILITY

Inadequate accessibility occurs when a person with a disability is disadvantaged because reasonable measures for accessibility have not been taken, preventing that person from being placed in a comparable situation with individuals without the disability. These measures should be reasonable according to legal requirements for accessibility, considering:

- Economic and practical conditions,*
- The specific conditions may vary depending on the type of employment the employee holds with Nepa.*
- Other relevant circumstances.*

3.4 HARASSMENT AND SEXUAL HARASSMENT

Harassment is behaviour that violates a person's dignity and is related to any of the grounds for discrimination, such as gender, gender identity or expression, ethnic affiliation, religion or other belief, disability, sexual orientation, or age. Sexual harassment is a behaviour of a sexual nature that violates a person's dignity.

3.5 INSTRUCTION TO DISCRIMINATE

Instructions to discriminate refer to orders or directives given by someone in a position of authority to a subordinate or dependent employee, instructing them to treat others unfairly or unjustly. These instructions may be given to anyone performing tasks on behalf of the person issuing the directive.

4. Action plan against abusive discrimination and harassment

The goal is to make sure that abusive special treatment and harassment cease as quickly and confidentially as possible. No action shall be taken without the consent/knowledge of the person who has faced discrimination and harassment. As an employee of Nepa you should never contribute to hiding offensive treatment or harassment in the workplace but instead inform your manager or HR about your suspicions.

4.1 IF YOU OR SOMEONE ELSE EXPERIENCE BEING VIOLATED / HARASSED:

If you suspect that you or someone else is being subjected to harassment or discrimination, it is important to take immediate action.

Report Your Concerns: If you or someone else feel violated or harassed, communicate clearly that you want the behaviour to stop. If you find it difficult to address the situation directly, seek assistance from a trusted colleague, supervisor, or HR.

Inform the Right People: Report the incident to your manager, someone you trust, or HR. Additionally, if you are not comfortable speaking directly to anyone, you can use Lantero, our anonymous whistleblower system, to report your concerns securely and confidentially.

Document the Behaviour: Keeping a diary or notes about incidents can be helpful for you, especially if you're feeling unsure or confused about a situation. It can give you a clearer picture of what's happening and help you recognize any patterns over time.

4.2 ABOUT LANTERO – WHISTLEBLOWER SYSTEM

Lantero is our secure whistleblower service, designed to enable reporting of any wrongdoing within the organization. The system provides a clear and consistent process to handle cases professionally, while allowing anonymous correspondence with the reporter. [Information about Lantero](#)

How to Report: Click on [Lantero](#) to create a new report and fill out the form as thoroughly as possible. You can also make a report by phone at 020-899 433. [Fill out the report here](#)

What is covered: Serious and sensitive concerns that could have an adverse impact on the operation and performance of Nepa that, due to their nature, cannot be reported through the normal reporting line are the focus of this policy. These can include:

- *Bribes*
- *Fraud*
- *Money laundering*
- *Embezzlement*
- *Insider crimes*
- *Market manipulation*
- *Violation of competition laws*
- *Non-compliance with internal controls procedures*
- *Breach of trust*

- *Discrimination*
- *Harassment*
- *Neglect*
- *Child labour*
- *Environmental crimes etc.*

Confidentiality: Reports made through Lantero are completely confidential, giving you peace of mind if you are not comfortable speaking directly to anyone.

4.3 IF YOU, AS A MANAGER, SUSPECT OR NOTICE SIGNS OF DISCRIMINATION OR HARASSMENT:

Act Promptly: Notify HR. Address the situation immediately and begin an investigation.

Active Listening: Listen carefully and take all concerns seriously, without judgment. Demonstrate empathy while maintaining objectivity. Document your findings thoroughly.

Subjective Experience: Focus on the individual's perception. If the person feels that they have been subjected to harassment or discrimination, this warrants further investigation.

Clarify the Conduct: Clearly communicate to the employee that harassment or any form of abuse will not be tolerated, as it is both unethical and illegal. Inform them about the next steps in the investigation process.

Swedish-Specific Guidance: If needed, contact occupational health services for support or activate "[Samtalsstöd](#)" It is anonymous.

Legal Consequences: Clearly inform the employee engaging in such behaviour that it constitutes a violation of workplace policies and is illegal. Repeated offenses may result in disciplinary action, including potential termination of employment. Similarly, ensure that the employee who is being subjected to such behaviour is aware of their rights and support options.

Maintain Support: Keep regular contact with the affected individual to ensure they feel supported throughout the process.

Remember! When an individual is subjected to violation, he or she is already at a disadvantage, and it may be very difficult for them to handle this situation.

The goal should be that the individual facing violation should remain in active service and not be further isolated from the workplace as on sick leave.

4.4 FOLLOW UP:

- Involve HR and determine if external assistance is needed.
- Ensure the affected individual has received initial support, such as access to occupational health services or counselling.
- Check regularly on their well-being and provide any necessary support.
- Document all conversations, meetings, and steps taken during the investigation.
- Gather relevant information through interviews and observations.
- Inform all involved parties of the actions taken and next steps.
- Maintain transparency while respecting confidentiality.
- Clearly communicate that harassment is illegal and may lead to disciplinary actions.
- Regularly check-in with the affected individual to ensure the behaviour has stopped.
- Assess if further interventions are needed, such as team discussions or workshops.
- Collaborate with HR to review policies and procedures to prevent future incidents.

- Plan activities that promote awareness and respect within the workplace.
- Ensure all documentation is securely stored and accessible for future reference.

5. Responsibilities within the organization

It is our shared responsibility to develop the organization and working conditions to create an equal workplace where everyone is treated with respect. The work towards equal treatment is a collaborative effort that involves all individuals at Nepa. The specific areas of responsibility are outlined below.

5.1 EMPLOYER RESPONSIBILITY

It is the employer's responsibility to ensure accountability for the working environment and working conditions. The employer must ensure that the workplace is free from discrimination and establish goals, guidelines, and policies that promote equal opportunities. This is achieved through continuous evaluation and follow-up of the active measures implemented. Additionally, the employer is responsible for reviewing the results of the investigation into the active measures.

5.2 HR RESPONSIBILITY

HR is responsible for ensuring that documentation, plans, and policies related to discrimination and active measures are established and made available to both managers and employees within the organization. The HR team is also responsible for conducting the annual salary audit, and in collaboration with management and managers, for continuously analysing and examining the effectiveness of active measures.

5.3 MANAGER RESPONSIBILITY

All managers are responsible for aligning with the overall company goals and principles as outlined in Nepa's Diversity and Inclusion Policy. Managers must integrate equal rights, equal treatment, and equal opportunities into all personnel and operational decisions. Additionally, managers are responsible for ensuring that policies and action plans are accessible and well-communicated to their employees.

5.4 EMPLOYEE RESPONSIBILITY

All employees have a responsibility to acquire knowledge about equality and equal treatment. Each employee must actively contribute to achieving the goals outlined in the Diversity and Inclusion policy.

6. Methods of working with active measures

Nepas Diversity and Inclusion Policy has been developed in HR.

OUR METHOD OF WORKING WITH ACTIVE MEASURES

The Diversity and Inclusion efforts are carried out systematically by HR, who is responsible for researching and acting on active measures. HR collaborates with representatives from within the organization who possess the necessary expertise to guide these efforts. The purpose of this is to work actively and systematically for a company culture that stands for every employee's equal right and opportunity at work, and to work against discrimination based on the seven grounds of discrimination. Furthermore, the work covers five areas: *working conditions, provisions and practices regarding pay and other terms of employment, recruitment and promotion, education and training and other skills development and possibilities to reconcile gainful employment and parenthood.*

The work is conducted continuously in 4 steps; *investigate, analyse, take measures* and *evaluate*. In the first step we *investigate* different aspects of the organization to find eventual risks for discrimination or punishments, or other obstacles for employees' equal rights and opportunities. In the second step we *analyse* the causes of the potential risks or obstacles found in the first step. In the third step we take the necessary proactive *measures* needed, based on the analysis. In the fourth step we *evaluate* the results of the actions that have been made. The experience from the evaluation is used in step 1 again (the investigation step) when the process starts over again. The four steps are documented, and a summary with potential risks and suggestions of measures to be taken, is presented to the Head of HR.



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Questions? Feel free to reach out to HR.
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