

Activity duty – Equality and anti-discrimination act

Table of Contents

1	Scope	2
2	References	2
3	Policies	2
4	Risk assessment - equality and anti-discrimination.....	2
5	Pay conditions by reference to gender	3
6	Other barriers to equality	3
7	Use of involuntary part-time work.....	3
8	Causes of identified risks	3
9	Implementation of measures.....	4
10	Evaluations of results	4
Appendix A	Employee categories	5
Appendix B	Risk assessment - equality and anti-discrimination.....	7

1 Scope

This document describes activities in Fred. Olsen Renewables (FOR) related to equality and anti-discrimination.

The document meets the requirements in the Norwegian Equality and Anti-Discrimination act, sections 26 ("*Likestillings- og diskrimineringsloven, Aktivitets- og redegjøringsplikten*").

2 References

Checklists and forms:

- None

Internal references:

- [FOR Code of conduct](#)
- [FOR Sustainability Policy](#)

External references:

- [Equality and Anti-Discrimination Act \(Section 26\)](#)

3 Policies

FOR Code of Conduct states:

"... we do not accept discrimination on the basis of gender, pregnancy, leave in connection with childbirth or adoption, care responsibilities, ethnicity, religion, belief, disability, sexual orientation, gender identity, gender expression, age, or other significant characteristics of a person".

FOR Sustainability Policy states:

"... we have a zero injuries philosophy and are committed to the protection of health and safety for our employees and subcontractor personnel, we care for the society around us, we have a responsibility to ascertain that our activities benefit local communities, and we are transparent and open in our communication with our stakeholders".

4 Risk assessment - equality and anti-discrimination

Reference is made to 'Appendix B Risk assessment - equality and anti-discrimination' describing the identified risks for discrimination or other barrier to equality.

The most significant risks identified are:

1. Gender imbalance
2. Ethnic, religious, cultural, or national background
3. Pregnancy, maternity, paternity leaves
4. Age discrimination
5. Physical disabilities

5 Pay conditions by reference to gender

The table below describes the gender balance in FOR per 31.12.2022:

Employees	TOTAL	Norway	Sweden	UK	Italy	Singapore
Male	61	29	12	13	6	1
Female	24	10	2	10	2	0
Total	85	39	14	23	8	1
Female ratio	28 %	26 %	14 %	43 %	25 %	0 %

Pay and remunerations are determined in individual work agreements and varies depending on responsibilities, education, age, and experience.

The individual's pay is confidential, and information about it only available to HR, the employee, and his/her line manager.

On request and on a case-by-case basis, persons or entities meeting the criteria in the 'Equality and Anti-Discrimination Act', Section 26a can be given access to pay information.

To analyse pay conditions, the employees are grouped in categories. The list of positions is listed in 'Appendix A Employee categories':

Employee category	Total	Male	Female	%
Level 1 managers (CEOs)	2	2	0	0 %
Level 2 managers (head of department or function)	11	10	1	9 %
Level 3 managers/office personnel	59	40	19	32 %
Service Technicians	13	11	2	15 %

A thorough review has been undertaken to analyse whether there is gap in pay between male and female employees. Differences in pay exists due to responsibilities, education, years of relevant experience, and general job market value. The analysis showed that there are no gaps due to gender in comparable functions.

6 Other barriers to equality

Reference is made to 'Appendix B Risk assessment - equality and anti-discrimination', listing the identified barriers towards equality and anti-discrimination.

7 Use of involuntary part-time work

There are no cases of involuntary part-time work in FOR.

A few employees may in exceptional cases reach agreement of reduced workload, e.g., 60% or 80% position. However, such agreements are initiated by the employee and not involuntary.

8 Causes of identified risks

Reference is made to 'Appendix A Risk assessment - equality and anti-discrimination', column "Root causes".

9 Implementation of measures

Reference is made to 'Appendix A Risk assessment - equality and anti-discrimination', column "Risk treatment actions".

The highest prioritised risk treatment actions are:

1. Emphasise on employing balanced group of female/male when possible
2. Encourage recruiting of candidates of different backgrounds
3. Emphasise policy to accept diversity
4. Embrace age diversity

10 Evaluations of results

Results of the implemented measures is conducted annually.

The management group and safety representative ("verneombud") participates in the evaluation.

Version history:

- 24.01.2023 • Updated paragraph 5 with number of employees per 31.12.2022
- 07.11.2022 • New document

Appendix A Employee categories

The table below describes the four employee categories in Fred. Olsen Renewables. It should be noted that this grouping is made explicitly for analysing gender balance in pay reviews, no other purposes.

Reference is made to 'FOR Organisation Chart' for detailed overview of all roles and employees.

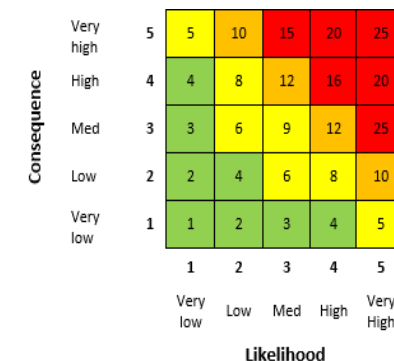
Department/function	Level 1 - CEO	Level 2 managers	Level 3 managers and office personnel	Service Technicians
Top management	CEO Development CEO Construction & Operations			
HSEQ		Head of HSEQ		
Contracts & Procurement		Head of Contracts & Procurement	Senior Contract Manager Contract & Procurement Advisor	
Market & Analysis		Head of Market & Analysis	Market Manager	
DEVELOPMENT		Director Partnership & Commercial Development Manager Norway Development Manager Sweden UK Development Director Country Director Italy Director New Business	Project Manager & BD (NO) Project Developer (NO) Project Manager (SE) Commercial Manager (UK) Senior Land Manager (UK) Assistant Land Manager (UK) Head of Communications (UK) Head of Energy Syst. & Reg (UK) Head of Technical (UK) Senior Project Manager (UK) Project Manager (UK) Assistant Project Manager (UK) Senior Project Manager (IT) Project Development Manager (IT) Senior Project Developer (IT) Project Developer (IT) Business Development Manager (FPV) Principal Engineer (FPV) Business Development Engineer (FPV)	

Activity duty – Equality and anti-discrimination act

Department/function	Level 1 - CEO	Level 2 managers	Level 3 managers and office personnel	Service Technicians
CONSTRUCTION		Project Director	Business Manager Project Controller Project Manager Senior Engineer HV & Electro Contract Manager	
OPERATIONS		Head of Operations & Maintenance	Operations Manager Scandinavia Operations Manager UK Operations Manager	Site Manager Site Support Service Technician
FINANCE		Chief Financial Officer	Chief Group Controller (Group Controlling) Chief Group Controller (Business Controlling) Chief Group Controller (Finance UK) Financial Analyst (NO) Project Secretary (NO) Senior Group Controller (NO) Group Controller (NO) Accountant (NO) Senior Business Controller (NO) Site Operations Controller (NO) Financial Controller UK (UK) Management Accountant (UK) Accounts Assistant (UK)	

Appendix B Risk assessment - equality and anti-discrimination

The table below specifies the identified risks, risk description, root causes, likelihood (L), consequence (C), risk factor (RF), risk treatment actions, and who is responsible for implementation.



#	Risk	Risk description	Root cause	L	C	RF	Risk treatment actions	Responsible
1	Gender imbalance	Lack of balance between genders in all parts of the company may result in too homogenous groups, with potentially less innovation and flexibility. Gender imbalance may also potentially increase the risk for sexual harassment.	Tendency to prefer candidates with similar education, experience, and gender as the rest of the group. Reluctance to include divergent members of the teams. No written procedures for recruitment process, including requirement for gender neutral wording.	4	3	12	Emphasis on employing a balanced group of female/male when possible. Encourage recruiting of candidates of different background. If otherwise qualified, at least one candidate of the minority gender should be shortlisted in the recruitment process.	Head of departments HR
2	Equal pay for equal work	Female employees may be paid less than male employees for equal work.	NOTE: This has not been an issue in FOR. Employment is given based on qualifications.	1	3	3	No actions required.	N/A
3	Pregnancy, maternity, paternity	Expectations of female employees in age 25-40 to be away on leave for long periods of time, may lead to preferring male candidates in the recruitment process	Traditional perception that women are more susceptible to longer periods of absence.	3	3	9	Emphasise policy to increase number of female employees (see #1)	

Activity duty – Equality and anti-discrimination act

#	Risk	Risk description	Root cause	L	C	RF	Risk treatment actions	Responsible
4	Caregiver responsibilities	Employees with extra caregiver responsibilities (disabled or seriously ill family members, duties towards older parents, etc.) may be discriminated in work situations/ internal promotions	Employees with extra caregiver responsibilities have less stable presence at work. (Note: No known cases)	1	3	3	No actions required.	N/A
5	Ethnic, religious, cultural, or national background	Diverging ethnic, religious, cultural, or national background may lead to candidates not being considered, eventually resulting in loss of competence	Personal scepticism towards people with different ethnic or religious background. Applicants with a foreign sounding name are not invited to an interview despite being equally qualified. Language barriers (see #6).	4	3	12	Seek to increase diversity in the team when hiring new employees.	Head of departments
6	Language barriers	Applicants who are not proficient in English may be excluded from employment.	English language, written and spoken, is an absolute prerequisite for work in FOR. Tendency of leaders to select subordinates with same cultural background and language. Some governing documents are only available in Norwegian.	1	3	3	Maintain requirement that all employees shall be proficient in the English language. Translate governing documents to English, i.e., 'Personalhåndbok', 'Lederhåndbok', training modules, etc.	HR
7	Physical disabilities	Due to lack of accessibility at offices, physical disability may lead to candidates not being considered for employment, and for existing employees needing to find new work. Note: Physical disabilities in this context means need for wheelchair or other mobility issues, no implications for reduced hearing or vision impairment.	Fred. Olsen headquarters does not have elevators and is not accessible for disabled persons. Some positions require extensive travel, field survey work, or GWO certification.	4	1	4	Seek to adjust work for existing employees that become disabled (home office, other means).	Head of department

Activity duty – Equality and anti-discrimination act

#	Risk	Risk description	Root cause	L	C	RF	Risk treatment actions	Responsible
8	Age discrimination	Age preference may lead to older candidates (50+) not being considered for new jobs or internal promotions,	<p>General perception that people above 50 have are less productive.</p> <p>Older employees have higher cost (pay, health insurance/pension) than younger employees.</p> <p>Managers may prefer to hire persons that are younger than themselves.</p> <p>Lack of recognising that long working experience should be considered an asset.</p> <p>No practical measures established for senior employees, e.g., reduced workhours (%).</p>	2	3	6	<p>Embrace age diversity.</p> <p>Work towards 'seniority policy' in Fred. Olsen.</p>	HR
9	Labour union memberships	<p>Unspoken expectance that employees in Fred. Olsen are not organised in labour unions.</p> <p>Lack of organisation of employees may influence how matters related to equality and anti-discrimination are handled.</p>	<p>No tradition in Fred. Olsen with unions.</p> <p>Low degree of labour union membership in the professions represented in FOR.</p>	3	1	3	Maintain Code of Conduct principle that no one should be turned down for employment due to being member of a union	Head of departments
10	Sexual orientation, gender identity, gender expression	Diverging sexual orientation, gender identity, gender expression may lead to candidates not being considered and for existing employees need to find new work	<p>Level of acceptance may be lower than publicly expressed in the society.</p> <p>Dress code may prove to be a challenge when meeting external stakeholders.</p> <p>(No cases experienced to date)</p>	1	3	3	Emphasis on Code of Conduct policy.	Head of departments