

Diversity policy & Diversity plan

December 2022

This policy is published in Swedish and English. In the event of any differences between the English version and the Swedish original, the Swedish version shall prevail.

This policy and plan describe Avanza's approach to diversity and gender equality issues, where no employee of Avanza may be treated differently due to gender, gender identity or expression, ethnicity, religion or other beliefs, disability, sexual orientation or age. The policy also describes the delegation of responsibility and an action plan against harassment. The aim is to ensure that all employees at Avanza are treated fairly.

Introduction

For Avanza, it goes without saying that every individual should have the same opportunities and equal conditions to develop regardless of gender, gender identity or expression, ethnicity, religion or other belief, disability, sexual orientation and age. Avanza believes that groups of people with different experiences and perspectives are more effective and dynamic than those who are too much alike. This in turn leads to a more efficient and profitable company. Assembling the right teams is an important management responsibility at Avanza and a long-term human resource priority.

What are diversity and gender equality?

Diversity and gender equality mean utilising EVERYONE's knowledge, experience and views to enrich and influence every part of Avanza.

Employee discrimination is expressly forbidden. All employees will be evaluated on an objective basis.

Goal and purpose

The purpose of the diversity and gender equality work is partly to ensure that no discrimination occurs and partly to raise the quality of our work, create a positive work environment and continuously improve Avanza as a company. The plan is designed to create an attractive and modern workplace in order to recruit, retain and develop employees with the right skills.

The work is tracked in among other ways through pulse surveys, which are conducted three times a year, with the results presented to all employees. Each group has workshops on their results and, if needed, crafts an action plan.

Responsibility

The CEO has overarching responsibility for diversity and gender equality. The work is done systematically and includes recorded documentation, analysis, active measures, evaluations and follow-ups. Avanza's ongoing work is coordinated with the occupational health and safety committee. The immediate supervisor is responsible for informing all employees about the diversity and gender equality work in their department/group. The manager also reports the results of pulse surveys and when improvement measures are being developed and implemented.

The CEO has delegated to the Head of HR responsibility for continuously tracking diversity and gender equality issues as well as conducting pulse surveys and evaluating the results according to Avanza's policy.

Risk assessment

It is important in daily operations to be aware of situations where conscious or unconscious bias may exist in order to proactively prevent it. We have done an evaluation and identified the following areas where we have to closely monitor and prevent risks of discrimination:

- Leadership
- Recruiting
- Skills training and promotions
- Salaries
- Physical, social and organisational work environments
- Work-life balance
- Corporate events such as staff parties, customer events and kick-offs

The risk of discrimination is often rooted in ignorance or a lack of tools to prevent, identify and address discrimination.

Leadership

A well-balanced team of men and women from different ethnic backgrounds in leadership positions is a visible expression of diversity, but also an important tool in the work to increase diversity in every part of the business. Managers have a big impact on the corporate culture and how the group as a whole acts.

Managers often set an example for others in the organisation, and it is also important for that reason to present diversity at the management level. A deep understanding of discrimination and gender equality by our managers is essential therefore to systematically eliminate bias and improve diversity in the organisation.

It is important that managers pay attention to the attitudes and behaviours of their employees and can contribute to spreading knowledge and influencing attitudes on issues of diversity and gender equality.

Goal:

Our managers set an example and have an understanding of diversity issues, and have the right tools to prevent, identify and eliminate discrimination.

Actions:

All managers with HR responsibility are offered annual training on recruiting with a focus on diversity to prevent discrimination

Diversity and gender equality issues are included in pulse surveys to proactively identify any signs of problems

Recruiting

Avanza wants to be seen as a multifaceted workplace that promotes gender equality and where diversity is part of the reason for our success. When recruiting, Avanza strives for diversity and gender equality. With the skills shortage that exists in our industry, it is especially important not to miss out on any groups of potential employees due to conscious or unconscious bias. We use a neutral, qualitative process to attract competent employees regardless of gender or ethnicity. To address the current imbalance in parts of the organisation, we are working actively to increase the share of female and non-native employees.

Goal:

A professional and unbiased recruiting process without risk of discrimination, where we recruit inclusively and attract a diversity of employees.

Actions:

1. The wording in recruitment ads will be reviewed from a diversity perspective
2. Job openings that are not filled internally will be advertised externally so that everyone has an opportunity to apply
3. Skill requirements will be based solely on what is relevant for the position
4. Challenge your ideal picture of an applicant, so that everyone has the same chance to advance in the process
5. Conduct competence-based interviews
6. Use “motivational and screening questions” instead of “personal letters”
7. Use tests based as far as possible on the skill requirements to create a more objective and professional assessment
8. Digital, structured and standardised reference checks without room for cognitive bias (subjectivity/gut feeling)
9. Provide training on Avanza’s recruiting process for recruiting managers to ensure that there is no conscious or unconscious bias
10. When the choice is between two candidates with similar skills, we give preference to the one who is underrepresented in that particular group in the organisation
11. Provide interview locations accessible to those with functional impairments

Skills training and promotions

Providing all employees with the opportunity to develop and be promoted is important in order to retain the right talent within the company, but is also an area where there is a risk of unconscious bias. By creating standard models for evaluating and promoting employees, we reduce the risk of subjectivity or favouritism.

All employees have a personal development plan which is updated in connection with their employee review. The plan will be formulated collaboratively by the manager and employee in an effort to retain employees and help them develop. To increase diversity in the organisation, special attention also has to be paid to promoting and providing development opportunities to female employees or employees who are underrepresented in other ways.

Goal:

A company with equal opportunities for everyone, with gender parity at every level of Avanza.

Actions:

1. An initiative is planned in 2021-2024 to increase the share of female employees at every level, especially in areas where they are underrepresented such as tech. This will be achieved partly through new hiring and partly by providing female employees with more opportunities for development

Salaries

Pay gaps due to gender and/or group affiliation and age are prohibited. To ensure this, Avanza conducts annual salary audits in connection with compensation reviews. The aim is to avoid pay gaps for equal or similar work. Pay gaps refer to disparities not based e.g. on differences in responsibility, difficulty, performance or current market rates.

Goal:

Pay discrimination is eliminated and no employee feels that they have been unfairly discriminated against.

Actions:

1. Salary audits are conducted annually, as permitted by law, to identify pay gaps due to discrimination

2. If a pay gap is identified, it is addressed

Physical, social and organisational work environment

We work actively to create a work environment suitable for all employees physically, socially, and organisationally. All employees and temporary staff will have equal opportunities and conditions in terms of e.g. working hours, assignments and amenities. Our work environment will in no way tolerate harassment, discrimination or abusive treatment. If it does occur, however, it must be reported to an immediate supervisor or to the company's hotline or, in the case of serious abuse, anonymously through Avanza's whistleblower channel. Management will act on all reported abuse, and it is forbidden to retaliate in any form against anyone who decides to report abusive activity.

Goal:

An inclusive workplace where all employees and temporary staff feel safe.

Actions:

1. All employees have a responsibility to acquaint themselves with Avanza's code of conduct, which describes their rights and obligations and how they can report abuse in the company
2. All new employees will receive training on the code of conduct as part of the company introduction
3. In the event an office is moved or renovated or other major changes are made, a risk analysis will always be done to ensure that the change does not discriminate against any groups of employees

Work-life balance

Avanza is positive to and encourages employees to take parental leave and stay home to care for a sick child. We compensate those on parental leave with parental pay over and above the ceiling applied by the Swedish Social Insurance Agency (Försäkringskassan). In this way we hope to achieve a better gender balance among those who take parental leave. Avanza also tries to make a work-life balance easier by allowing employees as far as possible to schedule their own working hours.

To help those on leave stay connected with their workplace and their own work area, Avanza will make it easier for them to participate in work-related meetings, seminars, training and conferences while on leave. The immediate supervisor is responsible for keeping them informed.

Goal:

All employees can take parental leave without fear of discrimination in wage setting or job openings.

Actions:

1. We clearly communicate the principles of salary administration and ensure that there is no salary discrimination due to parental leave
2. We ensure that those on parental leave have access to information within the company, including job openings
3. An employee on parental leave who applies for a job and has the right skills will be treated equally with other applicants

Corporate events

At staff parties, conferences or kick-offs, with or without customers, there is a risk of harassment or discrimination, especially if alcohol is served. The company is responsible for ensuring that all corporate events are conducted in a way that treats all employees equally.

Goal:

No employee should feel hesitant to attend a corporate event due to the risk of discrimination.

Actions:

1. Ensure that Avanza’s policy on alcohol and drugs is followed at corporate events. The policy encourages moderation and always offers non-alcoholic alternatives
2. Plan corporate events so that all employees to the extent possible can attend regardless of gender, religion or disability. Any cultural differences must be taken into consideration when planning a corporate event.

Zero tolerance of harassment, discrimination and abusive treatment

No employee may be subjected to harassment, discrimination or abusive treatment. Abuse can target either an individual or a group. As representatives of the company, Avanza’s executive management and managers have a responsibility for ensuring that no one is subjected to harassment, discrimination or abusive treatment. Every employee is expected to take responsibility for their own actions and not mistreat others.

Those who are subjected to harassment, discrimination or abusive treatment are presumed to be telling the truth in the definition of what is perceived as abusive treatment.

Examples of harassment include:

- Hostility toward another gender or someone with a different ethnicity, religious affiliation or physical abilities.
- Humiliating jokes.
- Generalisations about certain characteristics or a lack of thereof, etc.
- Women and men who are isolated and are not given the chance to speak at meetings.
- Unwelcome touching, e.g. patting, pinching, rubbing or sexual references, glances, gestures or forms of address as well as sexual comments about appearance, clothing or personal lives.
- Offensive images, off-colour jokes or the like with references to gender, gender expression, ethnicity, religion or other beliefs, disability, sexual orientation and age.
- Where an employee is relieved of duties, misses out on a benefit or in other ways is treated unfairly in relation to other employees.

Harassment, discrimination or abusive treatment are a serious threat to the integrity of our employees, the workplace and employee motivation, which can lead to poor health and affect Avanza as a company.

To prevent harassment, discrimination or abusive treatment, Avanza will not tolerate any action, comment or other derogatory statement that can be perceived as discriminatory. There is also no question that the workplace must be free from offensive images.

Responsibility

It is important to stress that harassment, discrimination and abusive treatment are not merely an issue for those affected but are also a major concern for Avanza as a company. It is everyone’s responsibility that the work environment discourage harassment, discrimination or abusive treatment. Consequently, offensive actions, language and attitudes are forbidden. In addition, managers are responsible for ensuring that there are no images, email or other objects or materials which can be perceived as offensive.

Action plan against abusive treatment

Avanza has an action plan against abusive treatment consisting of two parts: a preventive part and a responsive part. The preventive part means that all employees are kept informed of the action plan and that Avanza’s management training and other training cover abusive treatment. The responsive part

includes a number of steps that a victim can take as well as measures that managers and the HR function can take such as counselling, assistance and follow-up. Avanza always takes action to address abusive treatment.