

*Policy on diversity, equity and
inclusion*



Aim of policy

This policy is intended to promote diversity, equity, inclusion and general human rights in Stefnr's hf. activities (hereinafter referred to as "Stefnr" or "the company").

Policy on diversity¹, equity and inclusion aims to create a workforce that is desirable and fair, as well as to support the welfare of Stefnr's employees and board. The policy promotes that everyone with comparable education, work experience and responsibility have equal opportunities and terms, and that diversity is encouraged in the composition of the company's staff and within the board.

The board aims for Stefnr to be model company that relays upon diversity and reflects the community and the customers we serve.

The workplace

Diversity and inclusion are fundamental to Stefnr's daily operations, reflected in the work involved in investing on behalf of the funds that Stefnr manages according to its mandate.

Human rights and equality are respected in all of Stefnr's activities. Discrimination, harassment², bullying, and abuse in the course

of employees' work will not be tolerated. Any kind of discrimination is contrary to this policy and is unlawful under the Gender Equality Act No. 150/2020 and the Act on Equal Treatment on the Labour Market No. 86/2018. Equal opportunities are promoted for everyone, including opportunities to pursue continuing education and professional development. All employees shall be assessed on an equal basis, irrespective of origin, nationality, religion, gender, beliefs, disability, reduced work capacity, age, sexual orientation or gender identity.

Special emphasis is placed on ensuring that Stefnr is an attractive workplace that attracts and retains outstanding employees. A diverse workforce is a competitive advantage that strengthens the company's performance. Stefnr shall therefore foster a positive and encouraging work environment that supports employees in both their professional and personal lives.

We respect different viewpoints and encourage critical thinking. We believe that open and critical discussion forms the basis for better decision-making.

The Stefnr issues an Equality Plan that defines its objectives and priorities in the field of equality for a period of three years.

¹ **Diversity** is defined as the existence of discrimination in a certain scenario, such as regarding origins, nationality, religion, sex, outlook on life, disabilities, occupational disability, sexual orientation or gender identity.

Equity is described as accessibility to equal opportunities to benefit from own efficiency independent of defined discrimination.

Inclusion is described as the actions taken to understand, support and utilize the individual strengths and diversity of individuals so that they feel welcome and appreciated.

² Harassment may, for instance, take the form of sexual, gender-related, or racial harassment.



Employee diversity, equity and inclusion

The board of Stefmir has set objectives for the company to promote diversity, equity and inclusion within the company and its activities, according to fiduciary duty:

1. When hiring employees, diversity will specifically be taking into consideration to strengthen the teams in the company.
2. That the company is introduced to different social groups, including students to spark interest in the it as a field of work
3. Look into all the company's communication with the aim of supporting diversity and to take equality considerations into account.
4. That employees and other stakeholders are educated on the importance of diversity, equality and inclusion in the workplace.
5. To achieve gender balance so that the proportion of women constitutes at least 40% of total enterprise headcount.

6. Flexibility at work is promoted and Stefmir supports work-life balance. Stefmir supports and encourages employees to exercise their right to parental leave.

Responsibility

The Executive Director shall be responsible for ensuring that the policy is complied with and shall respond to deviations in an appropriate manner. The policy is also intended to promote good practice within the company, and it applies to all its activities. Employees are encouraged to notify their supervisor or others in accordance with their procedures, if they believe that discrimination, harassment, bullying or abuse has taken place in the company's operations.

Policy revision, publication and transparency

The board will review the policy and its goals annually and then published on the company's website. In Stefmir's annually published non-financial information, based on Nasdaq's ESG Reporting Guide, can be found information on social and governance factor.