

	POLICY	
	Number: 3PL1 Version: 1	Approved: Riga, 2023.06.21. Minutes of the Supervisory Board Meeting No. 09/2023

## EQUALITY, DIVERSITY AND INCLUSION POLICY

### 1. POLICY OBJECTIVE

- 1.1. The objective of the Equality, Diversity and Inclusion Policy (hereinafter – Policy) is to set out common principles to ensure the implementation of equality, diversity and inclusion at DelfinGroup in relation to:
  - 1.1.1. the working environment;
  - 1.1.2. the culture of the organisation;
  - 1.1.3. the employees;
  - 1.1.4. the customers.
- 1.2. DelfinGroup recognises and acknowledges the diversity of society and the need for equal opportunities.
- 1.3. In order to enhance DelfinGroup’s competitiveness, including its ability to meet the needs of diverse customers and interest groups, people – their abilities, knowledge, talents and uniqueness – and harnessing the benefits of diversity, are a priority for DelfinGroup.
- 1.4. DelfinGroup condemns all forms of unlawful and unfair discrimination.

### 2. EQUALITY, DIVERSITY AND INCLUSIVE WORKING ENVIRONMENT

- 2.1. Principles of DelfinGroup for a diverse and inclusive working environment include:
  - 2.1.1. respectful treatment, communication and cooperation among all employees;
  - 2.1.2. teamwork and employee participation, encouraging the representation of diverse employee views, ideas and opinions;
  - 2.1.3. the implementation of dynamic working relationships that meet the diverse needs of employees;
  - 2.1.4. participation by DelfinGroup and employees in activities to promote greater understanding of and respect for diversity.

### 3. INCLUSIVE ORGANISATIONAL CULTURE

- 3.1. Principles of DelfinGroup in building an inclusive culture:
  - 3.1.1. valuing mutual respect, diversity, inclusion and respect for equal treatment in the organisation’s culture and relations with stakeholders;
  - 3.1.2. setting equality, diversity and inclusion objectives in the corporate strategy and monitoring implementation;
  - 3.1.3. decisions affecting DelfinGroup employees are made on the basis of their professional skills and qualifications, without regard to gender, race, colour, age, religion, mental or physical disability, pregnancy and parental leave, marriage or civil partnership, sexual orientation, political affiliation or origin, or any other subjective criteria;
  - 3.1.4. information on equality, diversity and inclusion indicators is included in annual reports and sustainability (ESG) reports.

### 4. EQUALITY, DIVERSITY AND INCLUSION OF EMPLOYEES

- 4.1. Principles of DelfinGroup for ensuring equal opportunities for employees:
  - 4.1.1. the criteria for employee selection and management processes, career development and remuneration are limited to professional competence, knowledge, experience and performance;
  - 4.1.2. the Supervisory Board and shareholders ensure, as far as possible, that diversity principles are respected in the selection process for the Members of the Supervisory Board and the Management Board, including in terms of experience, nationality, gender diversity and age diversity;
  - 4.1.3. optimal use and equal treatment of employees’ knowledge and talents, thus avoiding discrimination on the basis of gender, ethnicity, colour, age, disability, sexual orientation, gender identity, religious or political beliefs or any other grounds;
  - 4.1.4. employees are continuously informed and trained about their rights, responsibilities and the principle of equal treatment;

4.1.5. dialogue with employees to ensure that all employees are informed and involved in the implementation of the Policy;

4.1.6. DelfinGroup respects all families, including unregistered partnerships and same-sex couples, their families (including both unregistered cohabitation and formally registered marriage), ensuring equal access to the benefits provided by the company for all.

## **5. EQUALITY, DIVERSITY AND INCLUSION OF CUSTOMERS**

### **5.1. Principles of inclusion of customers:**

5.1.1. providing a diverse range of financial services, contributing to reducing social exclusion and discrimination;

5.1.2. providing financial services to the elderly to continue their active economic life;

5.1.3. availability of services in both in-person and distance channels across a wide geography.

## **6. RESPONSIBILITIES AND ACCOUNTABILITY FOR POLICY IMPLEMENTATION**

6.1. The Policy is a public document binding on all employees and officials of DelfinGroup;

6.2. Business Partners are advised to familiarise themselves with and comply with the Policy;

6.3. The Heads of Departments are responsible for:

6.3.1. compliance with the Policy within their Department;

6.3.2. reporting cases of non-compliance with the Policy to the HR Director;

6.4. The HR Director is responsible for:

6.4.1. implementation and day-to-day application of the Policy;

6.4.2. regular exchange of information between Departments and training to promote understanding of equality, diversity and inclusion principles and their relevance to the company;

6.5. The Management Board is responsible for:

6.5.1. compliance with the principles of the Policy and providing the necessary resources for the implementation of the Policy;

6.5.2. implementation and compliance with the principles set out in the Policy in all Group companies;

6.5.3. development and updating of the Policy as necessary, but at least every 3 years;

6.6. The Supervisory Board is responsible for:

6.6.1. approval of the Policy and any changes thereto;

6.6.2. top level oversight of compliance with the Policy;

6.7. The Internal Auditor is responsible for:

6.7.1. providing an independent assessment of the operation of the Policy.