

# Equal Opportunities Report for Elmera Group ASA



Elmera Group

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The Norwegian part of Elmera Group includes the following companies: Elmera Group ASA (EG), Fjordkraft AS (FK) and Gudbrandsdal Energi (GE).

Part 1 and 2 of the report has been prepared on the basis of the Norwegian Equality and Anti-Discrimination Act, Section 26 – Activity duty of employers and Section 26 a – Duty of employers to issue a statement.

Part 3 of the report is about Nordic Green Energy (NGE) which operates in Sweden and Finland.

Information about Gudbrandsdal Energi AS is only included in part 1 of the report. Gudbrandsdal Energi AS is not included in part 2 of the report – the Equal Opportunities Report – the company’s work to promote equality and against discrimination (with the exception of section 2.1, which applies to the entire Group). This is because Gudbrandsdal Energi AS has fewer than 50 employees. In such cases, the Act imposes slightly less extensive activity requirements, and instead of an obligation to report, such companies are only obliged to document the work they have done (specified in the Annual Report of Gudbrandsdal Energi AS).

Elmera Group ASA promotes equal opportunities and anti-discrimination. Everyone associated with the company must be treated as being of equal worth and have equal opportunities and equal rights.

Elmera Group ASA has enshrined in the Group’s Code of Conduct (section 5.6) that the company require an inclusive work culture. We must recognise and appreciate that everyone is unique and valuable and must be respected for their individuality. Elmera Group does not accept any form of harassment or discrimination on the basis of gender, religion, race, national or ethnic origin, cultural background, social affiliation, disability, health, sexual orientation, civil status, family situation, age or political opinion.

Elmera Group ASA practices this through its recruitment processes, equal pay, access to career development and professional training/development, and facilitation and combination of work and family life.

The figures in tables 1-11 include figures for Elmera Group ASA (company), as well as other companies in the Norwegian part of the Group.

Figures for the number of employees are at 31 December 2022.

# Part 1: Current status of gender equality

Part 1 deals with the status of gender equality for employees of the company at 31 December 2022. The data for part 1 was collected in cooperation with the Working Environment Committee (AMU) and the Joint Elected Representative Committee (FTU).

Figures presented in this report are based on all employees who have an employment contract with the company. Employees whose employment is external to the company are not included in the analysis.

## 1.1 Gender balance

Gender balance, Elmera Group ASA																
Number/gender	Total		Category 1 *)		Category 2 *)		Category 3 *)		Category 4 *)		Category 5 *)		Category 6 *)		Category 7 *)	
	Number	% of total	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%
Women	27	30,34%	0	0	2	15,38%	5	33,33%	16	39,02%	2	15,38%	2	33,33%		
Men	62	69,66%	0	0	11	84,62%	10	66,67%	25	60,98%	11	84,62%	4	66,67%	1	100,00%
Total	89	100,00%	0	0	13	100,00%	15	100,00%	41	100,00%	13	100,00%	6	100,00%	1	100,00%

Gender balance – subsidiary (Norwegian part of the Group) *1)																
Number/gender	Total		Category 1 *)		Category 2 *)		Category 3 *)		Category 4 *)		Category 5 *)		Category 6 *)		Category 7 *)	
	Number	% of total	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%	Number	%
Women	132	46,64%	50	54,35%	23	51,11%	24	42,11%	19	36,54%	12	50,00%	4	36,36%		
Men	151	53,36%	42	45,65%	22	48,89%	33	57,89%	33	63,46%	12	50,00%	7	63,64%	2	100,00%
Total	283	100,00%	92	100,00%	45	100,00%	57	100,00%	52	100,00%	24	100,00%	11	100,00%	2	100,00%

Table 1 – Status of gender balance

\*) *Specification of the various job categories – where group 1 = the lowest level*

1) *The overview shows the total for Fjordkraft AS and Gudbrandsdal Energi AS*

**Category 1** primarily includes customer advisors and TM salespersons

**Category 2** primarily includes advisors

**Category 3** is defined as senior advisor

**Category 4** includes senior advisors, supervisors and group leaders

**Category 5** is defined as department managers and supervisors

**Category 6** is the management division (reports to the chief executive officer)

**Category 7** is the CEO/chief executive officer

An overview of job categories and associated assessment criteria is available to all employees on the company's intranet.

The distribution in Table 1) is based on existing job categories in the Norwegian part of the Group. We have assessed equal work and work of equal value in our formulation of job categories and have defined requirements/assessment criteria related to relevant education, relevant experience, other skills/knowledge, as well as responsibilities and content of the job. Within the job categories there are several different types of jobs with different requirements.

Organisational placement is also taken into account in the two highest levels (with few exceptions related to the nature and content of the position). We also have some exceptions that deviate from the requirements for the different categories. This is based on historical

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factors as a consequence of, among other things, transfers of company ownership, and employees who have previously held managerial positions.

### **Status of the gender balance**

The gender balance shows that the proportion of women in the Norwegian part of the Group at 31 December 2022 was 42.6 per cent.

An analysis of the gender balance in the Group shows that we have a relatively equal distribution of women and men.

Proportion of women specified by company (Norwegian part of the Group):

- Elmera Group ASA: 30.3 per cent
- Fjordkraft AS: 45.7 per cent
- Gudbrandsdal Energi AS: 53.8 per cent

### **Status of the gender balance in the company Elmera Group ASA linked to Table 1**

As shown in Table 1 – Status of the gender balance – we can see a higher proportion of men in the company Elmera Group ASA. This applies to the company in general, but also within each job category in particular.

Employees in Elmera Group ASA are primarily linked to units such as finance, strategy and operations (including IT operations and IT system development).

On a general basis, we can say that the private sector, energy industry and positions related to IT have historically been dominated by men and that it takes time to increase the proportion of women in the industry, and particularly in IT-related management positions.

Active efforts are therefore being made to recruit women to jobs within IT – through both internal and external recruitment.

The same applies to sales management (described below).

Further analysis shows that women are underrepresented in the top three job categories – categories 5, 6 and 7.

Personnel managers in Elmera Group ASA (with the exception of managers in the executive management group) are placed in category 3, 4 and 5. Elmera Group ASA has in total 12 personnel managers – three women and nine men. For personnel managers the proportion of women is 25 per cent. Active efforts are being made to recruit women to jobs included in this category – through both internal and external recruitment.

Job categories 6 and 7 in Elmera Group ASA constitute the Group's management team – in addition to the CEOs of Fjordkraft AS and Gudbrandsdal Energi AS, respectively – both of whom are in job category 7 in their respective companies. The Group's executive management comprises nine members and the gender distribution between women and men is 22 per cent and 78 per cent, respectively.

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## **The status of the gender balance in the Norwegian subsidiaries (Fjordkraft AS and Gudbrandsdal Energi AS) linked to Table 1**

The overall gender balance for the Norwegian subsidiaries is 46.6 per cent (132/283)  
The status with regard to gender equality is considered to be good in both companies.

We can see that the gender balance is relatively evenly distributed in job categories 1-3.

In category 4 there is a larger proportion of men. In this category, a large proportion of employees are related to sales management. On a general basis, we can say that the private sector, energy industry and positions related to sales management have historically been dominated by men and that it takes time to increase the proportion of women in the industry, and particularly in sales-related management positions.

When hiring in general, the companies will seek a good balance between the genders. For job categories with a low proportion of women, active efforts are being made to recruit women to positions included in these categories – through both internal and external recruitment.

Measures include HR making recruiters aware, when preparing for recruitment processes, that they should be looking for candidates of both genders, and specifying in assignment descriptions for recruitment agencies, when they are used, that the company expects to be presented with candidates of both genders. Other measures in 2022 are described in section 2.2.

## **1.2 Overview of employees by job category and age – shown per company in the Norwegian part of the Group**

### **1.2.1 In general about the number of employees and the number of FTEs**

At 31 December 2022, the Norwegian part of the Group had 372 employees.  
This amounts to a total of 367.1 FTEs:

- Elmera Group ASA: 88 FTEs
- Fjordkraft AS: 253.3 FTEs
- Gudbrandsdal Energi AS: 25.8 FTEs

The number of employees is calculated on the basis of how many permanent employees each company had at 31 December 2022.

The number of FTEs is calculated on the basis of the employee's percentage position at 31 December 2022.

FTE = total FTE percentage position for all employees/100. This gives the number of FTEs.

In the companies Elmera Group ASA and Fjordkraft AS, in 2022 there was significant fluctuation in the number of employees from the beginning of the year until the end of the year. This is related to a major reorganisation of the Group, when more than 80 employees were moved from Fjordkraft AS to Elmera Group ASA. This was in connection with a transfer of company ownership in August 2022.

Company Category	Number	20 - 29 years	30 - 39 years	40 - 49 years	50 - 59 years	60 - 69 years
Elmera Group ASA	89	11	24	25	21	8
Category 2	13	7	5	1		
Women	2	1		1		
Men	11	6	5			
Category 3	15	4	6	2	3	
Women	5	1	1	1	2	
Men	10	3	5	1	1	
Category 4	41		12	13	10	6
Women	16		2	6	5	3
Men	25		10	7	5	3
Category 5	13			7	4	1
Women	2			1	1	
Men	11		1	6	3	1
Category 6	6			2	3	1
Women	2			1	1	
Men	4			1	2	1
Category 7	1				1	
Men	1				1	

Table 2 – Elmera Group ASA: Distribution of gender and age within the various job categories.

Company Category	Number	20 - 29 years	30 - 39 years	40 - 49 years	50 - 59 years	60 - 69 years
Fjordkraft AS	257	23	114	65	41	15
Category 1	87	14	51	14	6	2
Women	46	6	24	8	6	2
Men	41	8	27	6		
Category 2	40	5	19	11	3	2
Women	19	1	7	8	2	1
Men	21	4	12	3	1	1
Category 3	52	4	28	7	9	4
Women	22		10	3	6	3
Men	30	4	18	4	3	1
Category 4	50		12	18	15	5
Women	18		5	6	5	2
Men	32		7	12	10	3
Category 5	21		2	12	5	2
Women	10		1	5	3	1
Men	11		1	7	2	1
Category 6	6		1	3	2	
Women	3			1	2	
Men	3		1	2		
Category 7	1				1	
Men	1				1	

Table 3 – Fjordkraft AS: Distribution of gender and age within the various job categories.

Company Category	Number	20 - 29 years	30 - 39 years	40 - 49 years	50 - 59 years	60 - 69 years
<b>Gudbrandsdal Energi AS</b>	<b>26</b>	<b>7</b>	<b>5</b>	<b>7</b>	<b>5</b>	<b>1</b>
<b>Category 1</b>	<b>5</b>	<b>5</b>				
Women	4	4				
Men	1	1				
<b>Category 2</b>	<b>5</b>	<b>2</b>	<b>1</b>	<b>2</b>		
Women	4	1	1	2		
Men	1	1				
<b>Category 3</b>	<b>5</b>		<b>1</b>	<b>1</b>	<b>3</b>	
Women	2			1	1	
Men	3		1		2	
<b>Category 4</b>	<b>2</b>		<b>1</b>	<b>1</b>		
Women	1			1		
Men	1		1			
<b>Category 5</b>	<b>3</b>	<b>1</b>		<b>1</b>		<b>1</b>
Women	2	1		1		
Men	1					1
<b>Category 6</b>	<b>5</b>		<b>2</b>	<b>1</b>	<b>2</b>	
Women	1		1			
Men	4		1	1	2	
<b>Category 7</b>	<b>1</b>			<b>1</b>		
Men	1			1		

Table 4 – Gudbrandsdal Energi: Distribution of gender and age within the various job categories.

### 1.2.2 New employees in 2022

In the Norwegian part of the Group, 34 new employees were hired in 2022 – of whom 13 women and 21 men.

Of the total number of new employees, the proportion of women amounted to 38.2 per cent.

For each company, the proportion of newly hired women in 2022 was:

- Elmera Group ASA: 0.0 per cent
- Fjordkraft AS: 30.8 per cent
- Gudbrandsdal Energi: 83.3 per cent

In 2022, employees were primarily recruited for telemarketing, customer service and IT.

Category/gender	Company			Total
	Elmera Group ASA	Fjordkraft AS	Gudbrandsdal Energi AS	
<b>Category 1</b>		<b>8</b>	<b>4</b>	<b>12</b>
Women		1	3	4
Men		7	1	8
<b>Category 2</b>		<b>10</b>	<b>2</b>	<b>12</b>
Women		3	2	5
Men		7		7
<b>Category 3</b>	<b>1</b>	<b>2</b>		<b>3</b>
Men	1	2		3
<b>Category 4</b>		<b>5</b>		<b>5</b>
Women		4		4
Men		1		1
<b>Category 6</b>	<b>1</b>			<b>1</b>
Men	1			1
<b>Category 7</b>		<b>1</b>		<b>1</b>
Men		1		1
<b>Total</b>	<b>2</b>	<b>26</b>	<b>6</b>	<b>34</b>

Table 5 – New employees by job category, gender and company

Company/gender	Age group				Total
	20 - 29 years	30 - 39 years	40 - 49 years	50 - 59 years	
<b>Elmera Group ASA</b>	<b>1</b>			<b>1</b>	<b>2</b>
Men	1			1	2
<b>Fjordkraft AS</b>	<b>12</b>	<b>9</b>	<b>4</b>	<b>1</b>	<b>26</b>
Women	3	1	4		8
Men	9	8		1	18
<b>Gudbrandsdal Energi</b>	<b>5</b>	<b>1</b>			<b>6</b>
Women	4	1			5
Men	1				1
<b>Total</b>	<b>18</b>	<b>10</b>	<b>4</b>	<b>2</b>	<b>34</b>

Table 6 – New employees by age and company

### 1.2.3 Number of leavers – turnover – in 2022

In 2022, a total of 62 employees left the Norwegian part of the Group:

- Elmera Group ASA: 1 employee
- Fjordkraft AS: 58 employees
- Gudbrandsdal Energi AS: 3 employees

Category/gender	Company			Total
	Elmera Group ASA	Fjordkraft AS	Gudbrandsdal Energi AS	
<b>Category 1</b>		<b>24</b>	<b>2</b>	<b>26</b>
Women		11	1	12
Men		13	1	14
<b>Category 2</b>		<b>13</b>		<b>13</b>
Women		9		9
Men		4		4
<b>Category 3</b>		<b>6</b>		<b>6</b>
Women		2		2
Men		4		4
<b>Category 4</b>	<b>1</b>	<b>14</b>		<b>15</b>
Women	1	5		6
Men		9		9
<b>Category 6</b>		<b>1</b>	<b>1</b>	<b>2</b>
Women			1	1
Men		1		1
<b>Total</b>	<b>1</b>	<b>58</b>	<b>3</b>	<b>62</b>

Table 7 – Leavers by job category, gender and company

Company/gender	Age group					Total
	20 - 29 years	30 - 39 years	40 - 49 years	50 - 59 years	60 - 69 years	
<b>Elmera Group ASA</b>		<b>1</b>				<b>1</b>
Women		1				1
<b>Fjordkraft AS</b>	<b>11</b>	<b>28</b>	<b>13</b>	<b>3</b>	<b>3</b>	<b>58</b>
Women	2	11	9	2	3	27
Men	9	17	4	1		31
<b>Gudbrandsdal Energi AS</b>	<b>1</b>	<b>1</b>		<b>1</b>		<b>3</b>
Women		1		1		2
Men	1					1
<b>Total</b>	<b>12</b>	<b>30</b>	<b>13</b>	<b>4</b>	<b>3</b>	<b>62</b>

Table 8 – Leavers by age and company



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## Turnover

Turnover is calculated on the basis of

- Number of leavers \*) divided by
- $(\text{number of employees at 31 December 2021} + \text{number of employees at 31 December 2022})/2$

\*) It is also important to emphasise that employees who do not switch to other work after they leave (pension, disability, AFP, other) are not included in the number of leavers on which turnover is based.

Due to transfer of company ownership and reorganisation of the Group in 2022, it will not be possible to calculate correct turnover per company at year-end.

Turnover for

- Elmera Group ASA at year-end (after transfer of company ownership): 1.14 per cent
- Fjordkraft AS before transfer of company ownership: 11.8 per cent
- Fjordkraft AS at year-end: 3.5 per cent
- Gudbrandsdal Energi AS at year-end: 12.2 per cent
- Turnover for the Norwegian part of the Group: 12.8 per cent

## 1.3 Position level and salary

Salary surveys were conducted and included in the Annual Report for 2021.

Since salary surveys are required as a minimum every other year, no salary survey is included for 2022.

Concerning position level and salary in general, for many years, prior to each pay settlement, the company has analysed selected job categories to identify any pay disparities between women and men in comparable positions. The information obtained from this is used in the annual pay settlement in order to even out any identified disparities.

In cases where the job has equal value, but is paid differently this is based, among other things, on personal performance, seniority, experience or market conditions. It may also be for historical reasons when transitioning from a senior position to a position at a lower level or in a transfer of business. Such deviations are justified and documented in connection with the company's annual pay settlement.

The company should not be a wage leader, although the company and conditions offered should be perceived as attractive and attract competent employees. The company's executive pay and remuneration policies are described in the company's Corporate Governance Policy and Guidelines for Remuneration to Senior Executives.

## 1.4 Temporary employment, employees in part-time positions and average number of weeks of leave of absence

The figures presented in section 1.4 are based on the number of permanent employees. Contracted staff from external manpower agencies are not taken into account.

### Temporary employees (paid by companies in the Group)

Company	Temporary employees	
	Women	Men
Elmera Group ASA	0	1
Fjordkraft AS	0	1 *)
Gudbrandsdal Energi AS	1	1

Table 9 – Overview of temporary employees at 31 December 2022. The table shows the number of women and men

\*) employed in a 10 per cent position – combined with studies

The company adheres to the general rule of employment on a permanent basis, but as agreed with the company's employee representative uses temporary employment to fulfil temporary capacity requirements. This applies primarily to hired temporary employees and consultants affiliated with external agencies, or to the hiring of hourly-paid temporary employees (primarily applies to Gudbrandsdal Energi AS). Hourly-paid temporary employees are not included in the overview in Table 3.

At 31 December 2022, there were four temporary employees who had an employment agreement with EG, FK or GE.

All temporary employees work full time, with the exception of one temporary employee in a 10 per cent position.

Temporary employees do not have access to company parking and are unable to use an option in the Group's performance bonus scheme which allows permanent employees to increase their bonus by 25 % when spent on company stocks.

### Part-time employees and non-elective part-time

Company	Part-time work			
	Actual part-time work		Non-elective part-time work	
	Part-time women	Part-time men	Non-elective part-time women	Non-elective part-time men
Elmera Group ASA	1	1	0	0
Fjordkraft AS	5	1	0	0
Gudbrandsdal Energi AS	0	1	0	0

Table 10 – Overview of part-time employees in the company at 31 December 2022. The table shows the number of women and men

The company in principle has no part-time jobs. For those of our employees who elect to work part-time, the company facilitates this as far as possible.

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Permanent employees in telemarketing positions primarily have 86.67 per cent positions, calculated on the basis of one FTE. This is due to the nature of the job and the legislation governing the time of day when potential customers may be contacted by phone.

### Parental leave

Elmera Group ASA, Fjordkraft AS and Gudbrandsdal Energi AS comply with the provisions of the Norwegian Working Environment Act regarding the right to leave (AML chapter 12 – Section 12-5 Parental leave)

In 2022, a total of 23 employees took statutory leave.

Of these, 9 were women and 14 were men:

- Elmera Group ASA: 7 men
- Fjordkraft AS: 6 men and 9 women
- Gudbrandsdal Energi AS: 1 man

Company	Parental leave – average number of weeks	
	Women	Men
Elmera Group ASA	0	13
Fjordkraft AS	35	14
Gudbrandsdal Energi	0	15

*Table 11 – shows the average number of weeks of statutory parental leave in 2022 for women and men*

In 2022, only one employee out of 23 (a woman) did not return to work after completing parental leave.

Facilitation and the ability to combine work and family life are important for the Group and for employees.

Employees retain their full pay above 6G on childbirth or adoption, as well as during sick leave beyond the employer period.

The Norwegian National Insurance Scheme covers salary for sick leave and parental leave at up to six times the basic amount under the National Insurance Scheme, which corresponds to an annual salary of approximately NOK 668,000 (at 1 May 2022).

If an employee has any wishes or needs that are not covered by statutory parental leave, the company seeks to accommodate the employee as best it can.

The average number of weeks of parental leave must be seen in connection with leave that started in 2021 and ends in 2023. Before then, we cannot obtain an accurate picture of the average number of weeks of statutory parental leave taken (see Table 11).

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## 1.5 Assessment of the figures in relation to previous years

### **Gender balance**

Comparison of the proportion of women in the Norwegian part of the Group shows that the proportion of woman declined slightly during the past year. In 2021, the proportion of women in the company was 43.5 per cent, while this decreased to 42.6 per cent in 2022.

Figures for 2021 and 2022 are not directly comparable. This is because reported figures for 2021 only included employees of Fjordkraft AS. Figures for 2022 include employees of Elmera Group ASA (which was part of Fjordkraft until 31 July 2022), Fjordkraft AS and Gudbrandsdal Energi AS.

By comparison, in 2021, the proportion for Fjordkraft AS was 49.4 per cent.

As noted earlier in the report, we can see that women are underrepresented in individual job categories. This is partly for historical reasons and because the Group finds that few women apply for sales management and IT jobs. We are constantly working to increase the proportion of women in these jobs in all areas: recruitment, pay and working conditions, promotions, development/training, facilitation and combination of work and family life.

### **Position level and salary**

A salary survey was included in the Annual Report for 2021. A new salary survey will not be included until 2023, as the requirement is that this must be reported at least every two years.

Temporary employment and employees in part-time positions

The company has few employees in these types of positions. This was also the case in 2021.

#### Comment:

The company has a certain number of contract staff and consultants in varying position percentages at any given time. These are from external agencies and are not included in the company's figures. These mainly provide extra capacity in customer service and telemarketing. The company practises a general rule of employing staff as permanent employees, although it uses temporary employment to meet temporary capacity needs by agreement with the company's employee representatives.

Fjordkraft had 98 hired personnel per 31.12.2022, amounting to 86.9 FTE. There were no major fluctuations during the year.

### **Taking statutory parental leave**

This year, as in 2021, the figures show that the company is facilitating that both genders take statutory parental leave.

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## 1.6 General information from Gudbrandsdal Energi (described in the company's Annual Report for 2022)

### **Working environment, equality and discrimination**

The company has stipulated in the Code of Conduct (section 5.6) that the company requires an inclusive work culture.

We must recognise and appreciate that everyone is unique and valuable and must be respected for their individual abilities.

The Company does not accept any form of harassment or discrimination on the basis of gender, religion or race, national or ethnic origin, cultural background, social affiliation, functional disability, health, sexual orientation, civil status, family situation, age or political opinion.

The company practices this through employment processes, equal compensation, access to promotion and professional training/development, and facilitation and combination of work and family life.

The gender equality status is considered to be good. When hiring in general, the company will seek a good balance between the genders.

The company is a workplace where there is no discrimination on the basis of ethnic background, national origin, skin colour, language, religion and beliefs, or functional disability.

The company has not considered it necessary to take special measures against discrimination.

In the Board's view, the company's working environment is good, and there has been no need to take special measures of significance to this. Absence due to illness in 2022 was 2.7 per cent, compared with 1.3 per cent in 2021. The increase is due to non-work-related long-term absence. No employees suffered injuries or accidents in 2022.

At the time of publication of the annual accounts, the composition of the Board was three women and four men.

Board members and the general manager have ongoing Board liability insurance in place through Elmera Group ASA.

# Part 2: Equal opportunities report – The company’s work for gender equality, and against discrimination

Part 2 describes how equal opportunities and non-discrimination are integrated into the company’s policies, procedures and standards, and how the company works on equal opportunities and non-discrimination in practice. The work to promote equal opportunities is conducted on a continuous basis.

In 2023, we will continue this work through further use of the four-stage method (see fig.)

The method involves *investigating the risk* of discrimination and barriers to gender equality, *analysing causes*, *taking measures* and *evaluating the results* of work in areas such as recruitment, pay and working conditions, promotions, development/training, and facilitation and combination of work and family life.

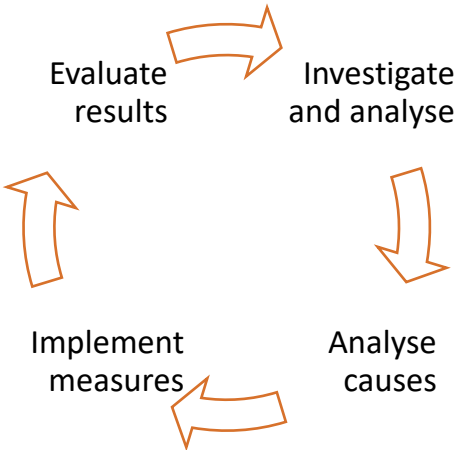


Fig. shows four-stage method for use in gender equality work

## 2.1 Principles, procedures and standards for gender equality, and against discrimination

The Group has implemented principles, procedures and standards for gender equality, and against discrimination, through the following:

- Guidelines for non-discrimination are anchored in the company’s Code of Conduct
- The Group actively promotes gender equality and non-discrimination in its personnel and recruitment policies
- The Group has set a gender equality goal under which the proportions of women and men in the Group must be in the range of 40-60 per cent, to ensure a well-balanced gender ratio.
- The Group also has the goal that the proportion of female managers with personnel responsibility must be equivalent to the proportion of female employees

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## 2.2 How the company works to ensure equal opportunities and non-discrimination in practice

Applicable to Elmera Group ASA and Fjordkraft AS.

There are no corresponding reporting requirements for Gudbrandsdal Energi AS.

The companies work continuously to ensure equal opportunities and non-discrimination in all areas. This takes place in cooperation with the Working Environment Committee (AMU) and the Joint Elected Representative Committee (FTU).

The four-stage method has been used in this work.

### **Steps 1 and 2: Investigate and analyse risks and possible causes of discrimination**

In a review of the areas of recruitment, pay and working conditions and promotion, the company has found the following possible causes of risk and obstacles:

1. Recruitment: Limited number of female applicants/relevant candidates in areas such as sales and IT
2. Recruitment and promotion: In management positions in the fields of sales and customer service, we have a predominance of men – this affects the gender balance as a whole for management positions with personnel responsibility.
3. Salary conditions: HR has surveyed pay differences between women and men who hold similar positions, but are paid differently. This has arisen partly from organisational changes, conditions related to high wages for historical reasons or transfers of company ownership
4. Discrimination on other grounds: In 2022, no cases of discrimination on the basis of ethnic background, national origin, skin colour, language, religion and belief or disability were reported in the Norwegian part of the company.

### **Steps 3 and 4: Implement measures and assessment of results**

1. Recruitment: In any recruitment process, HR focuses on recruiting women in the company's various areas. Relevant measures have focused on the design of job advertisements to ensure they attract both women and men, the use of images of both genders in advertisements, and ensuring that both women and men are represented in interview situations, etc.

The result for 2022 shows a reduction in the number of newly hired women from 49.4 per cent in 2021 to 35.3 per cent in 2022 (figures for 2021 are only for Fjordkraft AS, while figures for 2022 are for the Norwegian part of the Group)

2. Internal recruitment and promotions: In the case of internal recruitment and promotions, the company has also focused on measures as mentioned in section 1. In 2022, three women were internally promoted to managerial positions in Fjordkraft AS (1) and Elmera Group ASA (2), respectively. In 2023, HR will continue to focus on an increased proportion of women on recruitment in general and for managerial positions in particular.
3. Salary conditions: Equalisation of pay differences within positions of equal value is safeguarded in connection with the annual pay settlement. This is to ensure that such differences are equalised over time.

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In addition, the companies to a great extent ensure employee diversity in terms of ethnicity, religion, beliefs and sexual orientation. The company facilitates equal opportunities for development/ training, for employees with special needs and for balancing work and family life.

## 2.3 The Company's focus on equal opportunities and non-discrimination in 2023

The company must be an attractive employer, both for employees and for potential future employees. A key element of being an attractive employer is to ensure equal opportunities and non-discrimination. This will not only benefit the employee, but also the employer.

Nevertheless, the company acknowledges that a greater degree of systematisation of the work will benefit all parties. Therefore, the company will work on systematising its work on gender equality and non-discrimination in 2023.

### **The following measures will be extended from 2022 into 2023**

- Formalise and structure continuous work on gender equality and non-discrimination, where we
  - I. continue the use of the four-stage method (see Fig. under section 2) based on the Norwegian Directorate for Children, Youth and Family Affairs' template for action overview and action plan
  - II. establish who should be included in the work (with the exception of employee representatives)
  - III. have an annual cycle showing activity, frequency of meetings etc. for gender equality work
  
- In order to increase the proportion of women in the Norwegian part of the Group in general, and in senior positions and areas such as sales and IT in particular, the company will continue to focus on promoting the visibility of women in the company through photos in ads, 'on stage', in the media and in recruitment and interview processes, to name a few.



# Part 3: Statement on gender balance and equal opportunities for Nordic Green Energy:

Nordic Green Energy (NGE) have operations in Sweden and Finland. The majority of the employees are located in Vasa, Finland. 8 employees are located in Stockholm, Sweden.

We have categorized alle employees based on the following groups:

Groups	
Group 1	Customer service, TM-sales, Back-office workers
Group 2	Service Specialists and other advisers
Group 3	Senior advisers, Team managers
Group 4	Division managers (reports to CEO)
Group 5	CEO

Table 12 shows an overview of all NGE employees categorized based on employee group and gender distribution.

Number/gender	Gender balance – Nordic Green Energy											
	Total		Category 1		Category 2		Category 3		Category 4		Category 5	
	Number	% of total	Number	%	Number	%	Number	%	Number	%	Number	%
Women	41	60,29 %	19	63,33 %	16	76,19 %	5	45,45 %	1	20,00 %	0	0,00 %
Men	27	39,71 %	11	36,67 %	5	23,81 %	6	54,55 %	4	80,00 %	1	100,00 %
Total	68	100,00 %	30	100,00 %	21	100,00 %	11	100,00 %	5	100,00 %	1	100,00 %

Table 12

Table 13 and 14 gives shows the distribution of permanent and temporary employees, hourly employees, and full-time and part-time employees for each country. All numbers are collected as headcount numbers. There has been no major fluctuations in either countries. Alle employees are entitled to the same benefits.

Number/gender	Nordic Green Energy Finland											
	Total		Permanent employees		Temporary employees		Hourly employees		Full-time employees		Part-time employees	
	Number	% of total	Number	%	Number	%	Number	%	Number	%	Number	%
Women	37	61,67 %	37	67,27 %	2	40,00 %	6	54,55 %	30	62,50 %	1	100,00 %
Men	23	38,33 %	18	32,73 %	3	60,00 %	5	45,45 %	18	37,50 %	0	0,00 %
Total	60	100,00 %	55	100,00 %	5	100,00 %	11	100,00 %	48	100,00 %	1	100,00 %

Table 13

Number/gender	Nordic Green Energy Sweden					
	Total		Permanent employees		Full-time employees	
	Number	% of total	Number	%	Number	%
Women	4	50,00 %	4	50,00 %	4	50,00 %
Men	4	50,00 %	4	50,00 %	4	50,00 %
Total	8	100,00 %	8	100,00 %	8	100,00 %

Table 14

## Use of rental workers

Extraordinary electricity prices increased customer contacts. Thus, NGE Finland had 6 rental workers that worked full-time in customer service from September 2022. NGE Sweden had an interim CFO which started his position in September 2022, working full-time.

## New hires and turnover

Total new hires in 2022 was 19. Table 15 shows gender balance on new hires in 2022, while table 16 shows age distribution.

Number/gender	New hires - Gender balance - Nordic Green Energy					
	Total		NGE Sweden		NGE Finland	
	Number	% of total	Number	%	Number	%
Women	9	47,37 %	2	100,00 %	7	41,18 %
Men	10	52,63 %	0	0,00 %	10	58,82 %
Total	19	100,00 %	2	100,00 %	17	100,00 %

Table 15

Number/Age group	New hires - Age distribution - Nordic Green Energy					
	Total		NGE Sweden		NGE Finland	
	Number	% of total	Number	%	Number	%
>30	13	68,42 %	1	50,00 %	12	70,59 %
30-50	6	31,58 %	1	50,00 %	5	29,41 %
Total	19	100,00 %	2	100,00 %	17	100,00 %

Table 16

Total contracts ended in 2022 was 19. Table 17 shows gender balance on contracts ended in 2022, while table 18 shows age distribution.

Number/gender	Contracts ended - Gender balance - Nordic Green Energy					
	Total		NGE Sweden		NGE Finland	
	Number	% of total	Number	%	Number	%
Women	16	55,17 %	6	75,00 %	10	47,62 %
Men	13	44,83 %	2	25,00 %	11	52,38 %
Total	29	100,00 %	8	100,00 %	21	100,00 %

Table 17

Number/Age group	Contracts ended - Age distribution - Nordic Green Energy					
	Total		NGE Sweden		NGE Finland	
	Number	% of total	Number	%	Number	%
>30	10	34,48 %	1	12,50 %	9	42,86 %
30-50	17	58,62 %	6	75,00 %	11	52,38 %
50<	2	6,90 %	1	12,50 %	1	4,76 %
Total	29	100,00 %	8	100,00 %	21	100,00 %

Table 18

Calculated turnover in NGE was 40 % in 2022. It was 34 % for NGE Finland and 70 % for NGE Sweden.

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### **Parental leave**

All of NGE employees are entitled to use parental leave in case of pregnancy or child born in the family (also adoption child has similar benefits).

In 2022 there was 10 employees (3 male and 7 female) who were entitled to parental leave and all those employees used their parental leaves during 2022.

Most of the employees that uses parental leave in NGE returns to same position as they were when they left to parental leave. In the year 2022 two of those who had used parental leave was no longer employed by NGE on 31.12.2022.

### **Non-discrimination**

There were no incidents of discriminations in NGE during 2022.