



FY23 Equality & Anti-Discrimination Report, Dell AS

In this report, Dell Technologies encompasses the Norway based business, known as Dell AS (Company Number 861272702).

We Value Diversity, Equal Opportunity, and Respect

We are committed to diversity, equality, and providing a safe and productive environment that fosters open dialogue and the free expression of ideas, free of harassment, discrimination, and hostile conduct. We recognize a shared responsibility to create and maintain that environment for the benefit of all.

We promote equal opportunities and fair treatment for all team members, customers, business partners and other stakeholders, regardless of race, color, religion or belief, creed, national, social or ethnic origin, sex (including pregnancy), age, physical, mental or sensory disability, HIV Status, sexual orientation, gender identity and/or expression, marital, civil union or domestic partnership status, past or present military service, family medical history or genetic information, family or parental status, protected veteran status, citizenship status when otherwise legally able to work or any other status protected by the laws or regulations in the locations where we operate (referred to in this report as “Identifiable Characteristics”). We provide equal employment opportunity to everyone who is legally authorized to work in the applicable country and we provide reasonable accommodations to individuals with disabilities.

All team members are expected to report suspected discrimination promptly and never retaliate against anyone who raises a good faith concern that unlawful discrimination has occurred. Our commitment to these principles is essential to our success.

State of Gender Equality

Dell Technologies has established an ESG goal to be achieved by 2030, to have 50% of our global workforce and 40% of our global leaders to be those who identify as women. At Dell AS, 38% of our leaders are female.

Below is our representation of the state of our gender equality at Dell AS as of January 31, 2023, the end of our fiscal year:

Geographical Region	Number of Employees			Women		
	FY23	FY22	FY21	FY23	FY22	FY21
Norway	141	155	167	18%	18%	16%

Permanent employees and percentage of women based in Norway at Dell AS

We have only 1 temporary employee, and he is a male intern. We do not currently have any temporary employees who are women. We have 6 other contingent workers, employed by a third-party vendor.

We have 3 Part time employees (1 aforementioned male intern, and 2 contingent workers whose genders are not captured in our system).



Norwegian Statutory Parental Leave, Dell AS as of January 31, 2023

We offer access to 16 weeks of paid parental leave for employees of Dell AS who become parents. The breakdown for FY23 is as follows:

Gender Balance Total in Norway*		Temporary Employees		Parental Leave**		Actual Part-Time Work***		Involuntary Part-Time Work	
Stated in Quantities		Stated as a percentage of Norway employees		Stated in average number of weeks		Stated as a percentage of Norway employees		Stated as a percentage of Norway employees	
Women	Men	Women	Men	Women	Men	Women	Men	Women	Men
25	115	0%	<1%	0.43	12.40	0%	< 1%	0%	0%

*We have 1 employee whose gender status is Undeclared.

** 1 woman was on parental leave for 3 days.

***We only have 1 part-time employee - an intern who is voluntarily working part-time.

Pay Equity

Dell AS has engaged Lon & HR Bolaget, an HR consultancy firm, along with the web-based tool, Pay Analytics, to conduct a thorough pay equity review.

The work has been assessed using a work evaluation method consisting of 24 questions pertaining to knowledge and skills, work effort, responsibility and working conditions to ensure both equal work and work of equal value was fairly rated and identified.

Jobs were then categorized into groups of comparable value to be assessed for gender pay equity.

	Gender Distribution at Different Job Levels/Bands		Women's Share of Men's Wages Stated in Percentage	
	Women	Men	Contractual Salary	Total Taxable Benefits in Kind
Total Distribution of Women vs Men at Dell AS	25	115	77%	73%
Band 1	3	7	0%	0%
Band 2	0	39	0%	0%
Band 3	6	21	87%	86%
Band 4	1	4	0%	0%
Band 5	2	14	0%	0%
Band 6	1	1	0%	0%
Band 7	0	6	0%	0%
Band 8	12	23	91%	93%

Above table only shows salary data for bands with at least 5 women and 5 men respectively



Band 3: In band 3, we have a combination of outside-facing sales roles and non-sales roles. Sales roles have a slightly higher compensation level. All non-sales roles in band 3 are held by females.

Band 8: The salary difference in band 8 (consisting of all Internal Sales team members) is predominantly due to the hiring in this band in late 2022 and early 2023 for entry level positions within the range comprised in this band. With an over representation of females in this band, the pay balance of the band appears skewed.

We Prevent Harassment and Discrimination

We treat everyone – team members, customers, business partners and other stakeholders – with dignity and respect. We must all be able to do our jobs in a safe and respectful environment without the distractions and disruptions caused by offensive, unprofessional or inappropriate behavior in the workplace.

Harassment can include actions, language, written materials, or objects that are directed or used in a way that undermines or interferes with a person's work performance, or creates an intimidating, hostile or offensive work environment. We never target anyone for negative treatment on the basis of Identifiable Characteristics (as noted above).

All forms of harassing conduct are prohibited at Dell Technologies, including without limitation:

- unwanted sexual advances, invitations or comments;
- visual displays such as derogatory or sexually oriented pictures or gestures;
- physical conduct including assault or unwanted touching; or
- threats or demands to submit to sexual requests as a condition of employment or to avoid negative consequences.

All team members are expected to report suspected harassing conduct promptly and never retaliate against anyone who raises a good faith concern that unlawful harassment has occurred.

Recruitment

Dell AS is committed to the principle of equal employment opportunity for all employees and to providing employees with a work environment free of discrimination and harassment. All employment decisions at Dell are based on business needs, job requirements and individual qualifications, without regard to Identifiable Characteristics (as noted above).

Pay & Working Conditions

Dell AS is a meritocracy — we believe people should be equitably compensated for the value they deliver to our customers and stakeholders no matter their gender, ethnicity, or other factor. We routinely review salaries — and make adjustments if needed — to ensure we pay employees fairly and consistently as compared to their peers and the relevant compensation market.



Dell provides a competitive and fair wage to all employees, including in our Norwegian operations. We focus on both external and internal factors to ensure our high standards of compensation and benefits are met. Externally, Dell participates and gathers data from the most reputable third-party technology survey vendors on an annual basis to ensure Dell's pay ranges are as competitive as possible. Technology Sector Compensation Surveys provide Dell timely insights, driven by a collection of data from peer companies operating in highly competitive talent markets spanning Dell's full product portfolio. Additionally, Dell partners with Strategic Advisory Committees that provide real-time market trends, and the availability of robust data ensures Dell is globally consistent across our own operating entities, locally relevant and competitive in the market.

Dell AS' commitment to equal employment opportunity applies to all persons involved in the operation of Dell's business and prohibits discrimination or unlawful harassment by or between any Dell AS employee, including officers, supervisors and co-workers, or applicants for employment at Dell AS, or by or between any Dell AS employee and any employee of Dell AS' customers, independent contractors, vendors, or other strategic partners. All employees are responsible for maintaining a work atmosphere free from discrimination and unlawful harassment by treating others with dignity and respect.

Career Development & Promotion

Dell AS believes that a key element in our employees' ability to build their career is their focus on Development. Achieving their career aspirations means knowing themselves, and what they want to do and having a plan to get there. Dell AS helps its employees find and work toward the best intersection of their strengths and aspirations with our company goals. We support them with guidance and tools that allow them and their leader to have meaningful conversations so they can be their best and do their best work, both today and tomorrow. To that end, Dell AS provides a spectrum of tools and resources to enable our employees to own their career and drive development discussions with their leader.

Dell AS also offers partial tuition reimbursement to allow employees to further their education at accredited universities, colleges, or other accredited educational institutions.

Work & Family Life

For over a decade, Dell AS has been committed to work-life balance and to leveraging flexible work solutions with its team members, allowing our employees to combine their work and family life to enjoy a lifestyle that fits their needs. We have a formal program in which team members who sign up for our Connected Workplace program receive a one-time stipend to help set-up their home office to work in a hybrid fashion. Our employees are still enjoying this benefit today.

Dell AS provides 5 weeks of paid vacation for all employees who have been with Dell AS for a full calendar year. They also accrue additional days at certain intervals. Those employees who have not been employed by Dell AS for a full calendar year receive a pro-rated amount of time off with pay based on their tenure. All employees are encouraged to take this time to disconnect and spend time with their families or as needed.



Principles, Procedures and Standards for Equality and Anti-Discrimination

Our equality and anti-discrimination work is anchored in Dell's various strategies, tools, and guidelines, as exemplified in our ethics and compliance structure and policies.

For more than a decade Dell AS has had clear guidelines to prevent discrimination, harassment, sexual harassment, and gender-based violence, with an associated notification system called 'Speak Up'. This is an anonymous reporting system that allows employees to report any unethical behavior. It is run by an independent third party, with multiple ways for employees to report an incident without worry of retaliation. They receive a case number so they can follow the progress of their claim to closure; however, no details of the investigation are shared to maintain the privacy of those involved.

In 2020, we enhanced and transformed our existing corporate training on intercultural, gender and sexual awareness to become mandatory development training for all team members on an annual basis.

We strive to attract more women to our available roles, as mentioned in our ESG goals for 2030, to have 50% of our global workforce and 40% of our global leaders be those who identify as women. As part of this goal, we have established procedures to ensure more gender representation in our recruitment processes.

Consideration of equality and non-discrimination is otherwise included in personnel policies.

How we Work to Identify Risks of Discrimination and Prevent Inequality

At Dell AS we work in collaboration between the Site Leadership team, the working environment committee (AMU), HR, and employees to secure governance and structure promoting equality.

The Site Leadership team, inclusive of HR, meets every sixth week and joins the AMU in their meeting every quarter. Additionally, Verneombud (part of AMU) has monthly meetings with the HR Manager, who is part of the Cross Site Leadership Team. The Verneombud is responsible for safeguarding the working environment on behalf of the employees by ensuring that activities are organized and maintained, and that work is carried out in such a way that consideration for the safety, health and welfare of the employees is safeguarded in collaboration with the company.

Further to this, and as a supplement to the annual team member survey, a culture of 'brown bag' meetings are held with team members at various times of the year to promote and ensure team member input in addition to the surveyed topics.

Amongst the employees, company supported and strategically aligned, but self-governed Employee Resources Groups such as *Pride* focusing on LGBTQ+, *Women in Action* promoting Women in Technology, among others are open to all employees to support and nourish the D&I culture.

In Dell's annual team member survey, 'Tell Dell', team members are asked if they feel safe to speak up and utilize the ethics & compliance reporting system in case they experience or observe others being subjected to verbal or physical harassment, or sexual harassment in a work context. The score of this question last year was 90%, reflecting that the Norwegian team members have a high confidence and faith not only in the system to manage



and action any such cases of unwanted and unacceptable behavior, but moreover that they also feel safe from retaliation due to speaking up.

We Discovered the Following Risks of Discrimination and Obstacles to Equality

Through qualitative conversation and surveying with employees, we learned that the jargon in the workplace at times can be perceived as exclusionary towards female team members. This will be addressed through 2023 initiatives.

We Found the Following Possible Causes of Risks and Obstacles to Equality, and Initiated the Following Measures

The Verneombud and the management have found that the gender representation at Dell AS in Norway is predominantly male, despite continuous efforts working towards Dell Technologies 2030 ESG goals of 50/50 gender representation.

As mentioned above, the female representation of leadership at Dell AS in Norway is 38%, closing in on our ESG goal for 2030. The focus going forward is to increase the overall female representation.

In late FY22 and early FY23, we focused on reviewing and revising our job advertisements, to ensure that the verbiage and appearance did not favor one gender over another.

Further, during FY23, the company launched an IT package of assistive technology, enabling otherwise abled team members with an equal basis for performing their job, providing them with progressive technology solutions.

Measures we are Planning in the Coming Year

We will emphasize our focus in driving a diverse and inclusive culture, among other things, by utilizing the company training material to address unconscious bias, intersectionality, in-groups and out-groups, equity, and microaggressions – and how these can appear in the workplace. This will also be used to address the feedback on the jargon being less inclusive for females.

By the third quarter, we will implement sanitary equipment offerings for our female team members to leverage in the female bathroom areas.

Results of the Work and Expectations for the Work Going Forward

We observe a generally strong anchoring of our culture in which we do not tolerate harassment, bullying and other unethical behavior; for FY23, we had no ethics and compliance cases raised pertaining to these topics, whilst at the same time detecting in our team member survey, Tell Dell, that our team members generally are very comfortable and trusting of the ethics & compliance reporting system put in place to manage reported cases.

Moreover, we are pleased to note that 98% of the team members express that they can be successful as their authentic selves when working at Dell AS.



In terms of reaching our 2030 ESG Goal on female representation, we still have some way to go when looking at the overall female representation within the company. In FY23, female hires made up 26.8% of the total hires in Norway, which is lower than desired.

Throughout the past year we unfortunately have not been able to observe the output of some of the initiatives we have put in place to heighten the gender diversity, i.e., our initiative of revised advertisements, as the company both locally and globally have hired very few new team members. However, we remain confident that we will start seeing results when the hiring volume increases again but will irrespectively continue our strategic focus on equality, as well as anti-discrimination.

In the year to come, Dell AS will continue to work with the AMU and the Verneombud to ensure that through our collaborative efforts, we apply a more systemic lens to the space of equality, inclusion, and anti-discrimination.

Norway, June 20, 2023

Nicolai Moresco

Nicolai Johan Moresco
Chairman of Board of Directors

Geir R-Strømme

Geir Rostadmo-Strømme
General Manager & Member of Board of Directors