



FY24 Equality & Anti-Discrimination Act Report, Dell AS

In this report, Dell Technologies encompasses the Norway based business, known as Dell AS (Company Number 861272702). The Dell fiscal year for FY24 ran from February 1, 2023, to January 31, 2024.

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 (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 Environmental, Social and Governance (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.

Our overall population at Dell Technologies, including Dell AS, has decreased due to ongoing organizational changes as part of an overall reorganization. Below is our representation of the state of our gender equality at Dell AS as of January 31, 2024, the end of our fiscal year.

Geographical Region	Number of Employees			Women		
	FY24	FY23	FY22	FY24	FY23	FY22
Norway	109	141	155	17%	18%	18%

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

We do not have any temporary employees. We have 6 other contingent workers, employed by a third-party vendor, however their genders are not captured in our system.

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

Norwegian Statutory Parental Leave, Dell AS as of January 31, 2024

We offer paid leave to our employees when they become parents. The breakdown for FY24 is as follows:

Gender Balance Total in Norway*		Temporary Employees Stated as a percentage of Norway employees		Parental Leave Stated in average number of weeks		Actual Part-Time Work** Stated as a percentage of Norway employees	
Women	Men	Women	Men	Women	Men	Women	Men
18	90	0%	0%	34.23	21.65	0%	1%

*We have 1 employee whose gender status is Undeclared.

**We only have 1 part-time employee

Pay Equity

Dell AS is committed to secure equal pay across all functions and levels of the organization and conducts regular pay equity analysis in all business units to understand and address any gender pay differentials. Jobs are categorized into groups of comparable value to be assessed for gender pay equity.

The reporting requirements require reporting of gender pay differentials and involuntary part-time employees every other year; as such, these requirements will be included in the Dell AS Equality & Anti-Discrimination Act Report for FY25.

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 based on 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 applicants. 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

At Dell Technologies 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 consistently when compared to peers and the relevant compensation market, and in accordance with applicable law.

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.

Looking internally, Dell focuses on company and business unit objectives, critical skills to meet business needs, affordability, attrition hot spots, and internal equity.

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, including FY24, 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.

Looking forward we're looking to preserve flexibility for our team members; however, we are also firm in our beliefs that human connection and derived collaboration and innovation are key components in our realization of our strategy. Hence for the coming year, Dell AS will be implementing a new hybrid solution offering flexible work arrangements enabling its team members to continue combining work and family life.

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.

Dell provides equitable treatment and reasonable accommodations for team members and applicants in accordance with local laws. A reasonable accommodation for a team member with a disability may include modification to policies and procedures, an adjusted work schedule, special equipment or transportation, or other job modification to optimize the individual's job performance, if such accommodation does not result in an undue hardship to Dell's business. Individuals who desire a workplace accommodation under any applicable law may make a request for such an accommodation to the individual's supervisor or Human Resources representative.

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.

Since 2020, we have enhanced and transformed our existing corporate training on intercultural, gender and sexual awareness, called *Be the Change* 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), Human Resources (HR), and employees to secure governance and structure promoting equality.

The Site Leadership team, inclusive of HR, meets every six weeks and joins the AMU in their meeting every quarter. Additionally, the Verneombud (part of the 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.

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, physical, or sexual harassment in a work context. The score of this question for FY24 was 86%, reflecting that the Norwegian team members have 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.

Further to this, and as a supplement to the annual team member survey, a percentage of employees globally are selected at random to participate in a pulse survey to capture employee sentiment mid-way through the year. Additionally, 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, self-governed employee resource groups that are company supported and strategically aligned are open to all employees to support and nourish the D&I culture. For example, *Pride* focusing on LGBTQ+, *Women in Action* promoting women in technology, among others.

Risks of Discrimination and Obstacles to Equality

Throughout FY24 we have not identified any risk of discrimination or obstacles to equality, and hence have no new actions in place. However, we will continue driving a diverse and inclusive culture, among other things, by utilizing the company *Be the Change* training material, and encouraging open dialogue to address unconscious bias, intersectionality, in-groups and out-groups, equity, and microaggressions – and how these can appear in the workplace.

Additionally, we have an ongoing focus to ensure that our job advertisements in terms of verbiage and appearance do not favor one gender over another.

Dell also offers 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.

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 FY24, 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 95% of the team members express that they can be successful as their authentic selves when working at Dell AS.

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.

Signature:



Jaromir Krnac
Chairman of Board of Directors



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General Manager & Member of Board of
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