



## FY25 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 FY25 ran from February 1, 2024, to January 31, 2025.

### 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 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.

We believe an inclusive workplace, made up of individuals with varying backgrounds, life experiences and perspectives, fuels innovation and is key to driving human progress. We are committed to recruiting, hiring, developing and promoting team members without discrimination. Dell follows the letter and spirit of the law in all we do. All our policies and practices are fully compliant with applicable laws.

### 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, 33% of our leaders are women.

Below is our representation of the state of our gender equality at Dell AS as of January 31, 2025, the end of our fiscal year.

Geographical Region	Number of Employees			Women		
	FY25	FY24	FY23	FY25	FY24	FY23
Norway	95	109	141	18%	17%	18%

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

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

We have 1 part-time employee, who is a woman, and 3 contingent workers whose genders are not captured in our system.

#### Norwegian Statutory Parental Leave, Dell AS as of January 31, 2025

We offer paid leave to our employees when they become parents. The breakdown for FY25 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
17	77	0%	0%	4.67	6.80	1%	0%

*\*We have 1 employee whose gender status is Undeclared.*

*\*\*We only have 1 part-time employee who is voluntarily part-time*

#### 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 appropriately any gender pay differentials. Jobs are categorized into groups of comparable values to be assessed for gender pay equity.

The assessment utilized 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 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
<b>Total Distribution of Women vs Men at Dell AS</b>	<b>17</b>	<b>77</b>	<b>87%</b>	<b>81%</b>
<b>Band 1</b>	<b>2</b>	<b>4</b>	<b>0%</b>	<b>0%</b>
<b>Band 2</b>	<b>1</b>	<b>28</b>	<b>0%</b>	<b>0%</b>
<b>Band 3</b>	<b>5</b>	<b>12</b>	<b>94%</b>	<b>77%</b>
<b>Band 4</b>	<b>1</b>	<b>4</b>	<b>0%</b>	<b>0%</b>
<b>Band 5</b>	<b>1</b>	<b>10</b>	<b>0%</b>	<b>0%</b>
<b>Band 6</b>	<b>0</b>	<b>0</b>	<b>0%</b>	<b>0%</b>
<b>Band 7</b>	<b>0</b>	<b>3</b>	<b>0%</b>	<b>0%</b>
<b>Band 8</b>	<b>7</b>	<b>16</b>	<b>100%</b>	<b>97%</b>

*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 women.

**Band 8:** Women are paid 100% to the men in that same bracket.

## **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 is committed to fair hiring practices in which all applicants have an equal opportunity based on qualifications and merit. Dell believes that creating a diverse environment, where global team members from different backgrounds, cultures, thinking styles, life and career experiences can grow and thrive and do their best work, give us a true competitive edge as a global business.

## **Pay & Working Conditions**

Dell Technologies' compensation and rewards programs strive to inspire team members to be their best and do their best work for our customers and the growth of our business. 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 competitively when compared to peers and the relevant compensation market, and in accordance with applicable law.

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 FY25, 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 the realization of our strategy. Hence for the coming year, Dell AS will be implementing a 5-day in office work policy but will remain flexible, 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.

Speak Up is our reporting system that augments our other efforts to foster a culture of trust, integrity and ethical decision making. Anyone can confidentially and anonymously use Speak Up to report suspected violations of the Dell Technologies Code of Conduct or applicable laws. Dell does not tolerate retaliation and is committed to protecting those who report suspected misconduct in good faith.

Since 2020, we have enhanced and transformed our existing corporate training on inclusion, called *Be the Change*, and promote it to all new hires during their onboarding process, and is available on demand to all employees at any time.

We strive to attract more women to our available roles, as mentioned in our ESG 2030 Goals, 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, meet on a quarterly basis, and more often if needed. HR and the GM also join the AMU in their bi-monthly meetings. 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 comfortable speaking up if they see behavior that is inconsistent with Dell Technologies' Code of Conduct. The score of this question for FY25 was 93%, 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 midway 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 our inclusive culture. For example, *Pride* focusing on LGBTQ+, *Women in Action* promoting women in technology, among others.

### Risks of Discrimination and Obstacles to Equality

Throughout FY25 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 inclusion – and the importance of allyship 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 FY25, Dell AS 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 93% 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:



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