

DIVERSITY & INCLUSION POLICY

1. Introduction

- 1.1. At Acomo, the company as a whole believes in order to be a leader in our business, we must be flexible, innovative, and creative and have an ability to accommodate other people's points of view. Acomo as a whole respects cultural and individual diversity, equity and promotes inclusiveness. We value an organization with access to equal opportunities for its employees without distinction to race, color, gender, sexual orientation, national origin, age, disability, or any other type of behavior that is hostile, disrespectful, abusive and/or humiliating.
- 1.2. We promote a culture of mutual respect and aim to build and maintain a diverse and inclusive work environment that prohibits discrimination and harassment and offers equal opportunities for all employees. The organization and its people share a responsibility for a work environment that is safe, engaging, inclusive, and conducive to personal and professional growth. Diversity in the workforce is crucial in such an environment.
- 1.3. Acomo recognizes and appreciates that people are our most important asset and that their capabilities, engagement, and talent determine our success. We ensure a work environment where people can thrive by attracting, developing, and rewarding employees for their contribution and commitment. Acomo promotes the use of personal development plans and employee satisfaction evaluations in its companies to ensure that every person feels valued and respected. Acomo offers leadership talent opportunities to demonstrate competence and pursue a well-defined path to future career growth within the Acomo Group.

2. Objective

Goals of the policy

Acomo Board

- 2.1. The Board strives to comply with the Dutch Corporate Governance Code ('the Code', see www.mccg.nl) and international best practices relating to diversity and the diversity aspects relevant to the company. Therefore, when looking at the board composition, we look at diversity in a broad sense, striving for factors such as nationality, gender, age, education, and work background. While at the same time, retaining the balance in the requisite expertise and experience required for the effective functioning of the Board.
- 2.2. Acomo pays close attention to diversity, including gender diversity, in the profiles of new directors of the Board in accordance with section 166, subsection 2 of the Dutch Civil Code ('the Act'). On 1 January 2022, 'the Act' on a balanced ratio of men and women on management and supervisory boards has entered into force. The Act provides for the following:
- 2.2.1. a gender quota (at least 1/3 men and 1/3 women) for the non-executive directors of public limited liability companies listed on a regulated market in the Netherlands; and
- 2.2.2. a self-imposed, appropriate, and ambitious target for the supervisory board, management board and senior management of large (public) limited liability companies in the Netherlands,



- 2.2.3. with an obligation to draw up a plan and to report on this in their management report and to the Social Economic Council in the Netherlands (SER).
- 2.3. The target for the Acomo executive board members aligns with the guidance as set out in the Dutch Corporate Governance Code.

Senior Management

- 2.4. By 2030, we are aiming for at least 30% women in senior management positions, excluding the Executive Members of the Board.
- 2.5. For Acomo, both the non-executive directors' quota and the target for the executive board members and senior management will apply.

All other employees

2.6. Promoting diversity in the composition of our workforce to be a representative reflection of society, whilst promoting a culture of inclusion and career development and opportunities.

Plan to achieve goals

- 2.7. Where searches for appointment are conducted by the Group companies or by search firms, they will identify and present qualified people, internally as well as external candidates, in order to base employment decisions on merit, considering qualifications, skills, performance, and achievements, and not to discriminate against any employee or applicant for employment based with a different nationality, gender, age, education, and work background. This is to ensure that everyone with the same competences, agility and potential has an equal chance of getting an appointment or opportunity to develop themselves.
- 2.8. We prioritize obtaining a full understanding on an ongoing basis of our human capital requirements and where the challenges lie to ensure a diverse competent workforce. Group companies have detailed overviews to help different areas of the business identify gaps and monitor progress on human capital management, at different levels of the organisation. The HR teams use these in their discussions with local management teams. A section of the social diversity and inclusion results are also communicated in the Acomo Annual Report.
- 2.9. In addition, there is a diverse composition of interviewers in a job application process, this ensures that application procedures are objective and transparent. In our job application texts, we adhere to the rules that prevent any form of discrimination. We make sure that our texts appeal to a diverse group. We check this regularly to ensure objectivity.

3. Monitoring and reporting

- 3.1. The Board will report annually, in the corporate governance statement of the Company's Annual Report. Such corporate governance statement of the Board will include the following relating to the Diversity and Inclusion Policy:
 - I. the goals of the D&I policy;
 - II. the plan to achieve the goals of the D&I policy;
 - III. the results of the D&I policy in the past financial year; and
 - IV. the gender composition of the management board, the supervisory board, the executive committee (if any) and senior management at the end of the past financial year.



- 3.2. If one or more goals for the composition of the management board, the supervisory board, the executive committee (if any) and/or senior management are not achieved, an explanation of the reasons should be included in the corporate governance statement, along with an explanation as to which measures are being taken to attain the goals, and by when this is likely to be achieved.
- 3.3. The Remuneration, Selection and Appointment Committee will review the Diversity and Inclusion Policy, including its effectiveness, as appropriate and recommend any revisions to the Board for approval.

4. Other

- 4.1. The Acomo Board reports its diversity and inclusion objectives and results annually in the Corporate Governance statement of the Company's Annual Report.
- 4.2. The Acomo Code of Conduct guides all actions and decisions and helps us to perform our work with the necessary due care and with integrity. Transgressive behaviour will not be tolerated and in the event of demonstrable non-compliance with the Acomo Code, action will be taken.
- 4.3. The Company reserves the right to modify, suspend, change, or terminate this Policy at any time, in accordance with local law and regulations. This Policy does not create any contractual rights or obligations, whether expressed or implied.