

# NetApp Iceland Equality Plan 2023 – 2026

## Introduction

*The following is an English translation of the Equality Directorate's approved Icelandic version.*

NetApp attracts and retains a diverse workforce of performance-oriented people who thrive by taking on challenging work in an inclusive environment, and who are recognized and rewarded for their achievements and contributions.

NetApp is dedicated to a workplace that is free of unlawful discrimination and also honors individual authenticity and builds belonging.

NetApp is an equal opportunity employer and makes employment decisions on the basis of merit, irrespective of gender. This encompasses all aspects of the employer-employee relationship, not just pay.

NetApp Iceland's equality plan applies to all NetApp Iceland employees. It is based on Equality Act No. 150/2020 and Act No. 86/2018 on Equal Treatment in the Labor Market. It aligns with NetApp Iceland's equal pay certification and is therefore applicable for the period 2023 – 2026 and shall be reviewed at the end of the period.

## Equal Pay Commitment

NetApp Iceland undertakes to:

- Ensure all employees of NetApp Iceland have the right to pay according to Act no 150/2020 on Equal Status and Equal Rights, irrespective of gender.
- Introduce, document, and maintain an equal pay system in compliance with standard ÍST 85:2012 and obtain equal pay certification in accordance with Act No. 150/2020.
- Ensure that equal pay core principles are followed and documented in every salary action and decision through hiring, rewards cycles, benefit grants, and off-cycle processes.
- Analyze via salary survey companies' results, applicable collective bargaining agreements, and internal audit measures to ensure the equal pay Standard ÍST 85:2021 is adhered to.
- Respond to non-compliance promptly with amendments, and ongoing analysis and review.
- Remain committed to compliance with all applicable laws and internal policies providing equal employment opportunities.

## Wage Equality

NetApp Iceland has implemented the following objectives as part of its equal pay system and equal pay certification.

Primary objective: All employees of NetApp Iceland are paid according to the work they do, irrespective of gender.

In order to achieve this primary objective, the following secondary objectives have been established.

Objective	Action	Responsibility	Timing
Introduce, document and maintain an equal pay system in compliance with standard IST 85:2012 and maintain equal pay certification in accordance with Act No. 150/2020	<ul style="list-style-type: none"> <li>Engage an impartial auditor to assess equal pay certification</li> <li>Review the standard against applicable legislation</li> <li>Implement or adjust processes where needed to ensure compliance</li> <li>Leadership communications and role in achieving compliance</li> </ul>	<ul style="list-style-type: none"> <li>Compensation Team</li> <li>HR Country Lead</li> <li>Leadership</li> </ul>	Annual basis
Ensure equal pay requirements are followed in every salary action and decision	<ul style="list-style-type: none"> <li>Multi-tier approval processes</li> <li>Leadership communications and role in achieving compliance</li> </ul>	<ul style="list-style-type: none"> <li>HR Country Lead</li> <li>Leadership</li> <li>Talent Acquisition</li> </ul>	Ongoing
Review, assess and implement measures to ensure compliance	<ul style="list-style-type: none"> <li>Update salary structures annually to ensure market competitiveness</li> <li>Review total rewards to assess for pay disparity via internal audits</li> <li>Discuss audit results with leadership, and take additional action</li> <li>Employee communications</li> </ul>	<ul style="list-style-type: none"> <li>Compensation</li> <li>HR Country Lead</li> <li>Leadership</li> </ul>	Annually and as needed
Respond to non-compliance promptly with amendments, and ongoing analysis and review	<ul style="list-style-type: none"> <li>Address non-compliance within two weeks of identification</li> <li>Employee communications</li> </ul>	<ul style="list-style-type: none"> <li>Compensation</li> <li>HR Country Lead</li> <li>Leadership</li> </ul>	As needed

## Equal Opportunity Employer

NetApp celebrates the diversity of cultures, traditions, perspectives, and experiences that our employees represent. We strive to recognize each employee's individual contributions.

NetApp's policies prohibit unlawful discrimination based on race, color, creed, sex, gender/transgender status, gender identity, gender expression, religion, marital status, age, citizenship status, national origin or ancestry, physical or mental disability, medical condition including genetic characteristics, pregnancy, sexual orientation or any other consideration made unlawful. This also includes a perception that anyone has any of those characteristics, or is associated with a person who has or is perceived as having any of those characteristics.

Equal job opportunities shall be available to all employees, irrespective of gender, gender identity or otherwise, in accordance with para. 1 of art. 12 of the equality law. Gender equality considerations form part of hiring and promotional criteria, including career progression, training, education, allocation of tasks, and application of total rewards.

Specific objectives include:

Objective	Action	Responsibility	Timing
Vacancies are open to everyone, irrespective of gender, gender identity, or otherwise	<ul style="list-style-type: none"> <li>Equal Employer Opportunity policy referred to in job ads, policies, and employment contracts</li> <li>Diverse interview panels</li> <li>Managers and interviewers are required to undertake training on how every candidate shall be treated during interview process</li> </ul>	<ul style="list-style-type: none"> <li>Talent Acquisition</li> <li>HR Country Lead</li> <li>Leadership</li> </ul>	As needed
Promotional criteria, training, allocation of tasks, and application of total rewards are based on merit, irrespective of gender	<ul style="list-style-type: none"> <li>Unconscious bias training for all employees</li> <li>Review total rewards to assess for pay and benefits disparity via internal audits</li> <li>Discuss audit results with leadership, and take additional action</li> </ul>	<ul style="list-style-type: none"> <li>HR Country Lead</li> <li>Leadership</li> <li>Compensation</li> </ul>	Annually and as needed

Employees enjoy work-life balance regardless of gender, in accordance with art. 13 of the equality law through flexible working hours, flexible working location, part-time work, time off benefits, or other measures.

Specific objectives include:

Objective	Action	Responsibility	Timing
Be known locally and internationally as a family-friendly workplace with a focus on work-life balance and flexibility, regardless of gender	<ul style="list-style-type: none"> <li>Win VR Family Friendly Company of the Year again</li> <li>Promote flexible working and benefits as part of recruitment and PR opportunities</li> <li>Decisions made on work hours; work location; work percentage are based on business need without bias towards gender or otherwise</li> <li>All employees can use their respective leave entitlements, including family care leave, regardless of gender</li> </ul>	<ul style="list-style-type: none"> <li>Talent Acquisition</li> <li>HR Country Lead</li> <li>Leadership</li> </ul>	As needed

NetApp is committed to compliance with all applicable laws providing equal employment opportunities. This commitment applies to all persons involved in Company operations and prohibits unlawful discrimination by any NetApp employee.

## A Harassment-Free Workplace

NetApp is committed to promoting and maintaining a workplace where all employees are treated and treat others with dignity and respect, free from harassment and bullying in any form, whether verbal, physical or otherwise, intentional or unintentional.

We respect and follow applicable laws wherever our business operates, and we are committed to providing employees with a working environment that is free of intimidation, hostility or other offensive behaviors that may threaten, humiliate, intimidate or otherwise interfere with an individual’s work performance.

**Prohibited unlawful harassment** is defined as unwelcome or unsolicited verbal, written, physical or sexual conduct, where submission is an explicit or implicit condition of employment, where submission or rejection of such conduct is used as the basis for making employment decisions, or which has the purpose or effect of substantially interfering with an employee’s job performance or which creates an intimidating, hostile or offensive working environment.

**Prohibited bullying** is defined as conduct, whether verbal, non-verbal, communicated in writing or physical, that a reasonable person would find hostile, offensive, inappropriate, abusive, threatening, humiliating or intimidating, and unrelated to legitimate business interests.

This applies to all persons involved in NetApp’s business operations and prohibits unlawful harassment and bullying by any NetApp employee regardless of position, as well as employees of other employers, contractors, visitors, customers, and/or vendors working with NetApp. All employees are required to undertake training on these topics.

Specific objectives include:

Objective	Action	Responsibility	Timing
All employees are familiar with NetApp’s harassment and bullying policies	<ul style="list-style-type: none"> <li>Code of Conduct</li> <li>Employee onboarding</li> </ul>	<ul style="list-style-type: none"> <li>HR Country Lead</li> <li>Leadership</li> </ul>	Annually and as needed
All employees know the communication channels to provide feedback or raise concerns about bullying, harassment or other behavior that goes against NetApp’s Code of Conduct	<ul style="list-style-type: none"> <li>Code of Conduct</li> <li>Employee onboarding</li> </ul>	<ul style="list-style-type: none"> <li>HR Country Lead</li> <li>Leadership</li> </ul>	Annually and as needed

## Reporting

If an employee sees or suspects discrimination, harassment or bullying, or if they feel that they or another person has been discriminated against, treated unfairly, or harassed or bullied, they can report it to their manager, HR, the Legal Department, the Integrity & Compliance Office, or the NetApp Compliance Hotline.

NetApp has a no retaliation policy against those who report any issues in good faith.

## Additional Information

[NetApp Code of Conduct](#)

[Diversity, inclusion, belonging](#)