

Head of responsible department: Bård Grande
Replaces politic: 30th, August 2021
Valid from: 15th, December 2022

Policy for diversity and inclusion in ATP

Ref. no.: ATP-02-02-000310617

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Adopted by ATP's Supervisory Board on December 15, 2022.

1. Purpose, scope, and strategic targets

ATP wants to be a competitive and attractive place to work and a company that is capable of attracting, developing, and retaining competent employees - both now and in the future. At the same time, we want to be an organisation with equal opportunities that acknowledges and values the potential diversity offers.

This policy supports ATP's strategic objective by making a positive contribution to sustainability through an ambitious and strategic approach toward diversity, equity, and inclusion (D&I) in the workplace. We want to ensure a systematic and coordinated approach to sustainability across management tiers and business areas. At the same time, we need to fulfill our social responsibility in relation to Danish society and ATP's salient stakeholders.

This policy and the related activities also focus on improving the opportunities for the underrepresented gender as every effort is made to ensure equal gender representation at top management levels.

ATP is a member of the UN Global Compact, and we are committed to the ten principles derived from:

- the Universal Declaration of Human Rights
- the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work
- the Rio Declaration on Environment and Development
- the United Nations Convention Against Corruption

The principles are operationalized through: The United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises which, among other things, prohibits ATP of discriminating in respect of employment and occupation.

The policy is grounded in long-term strategic targets, focus areas, and action plans. The policy applies to the entire ATP Group, however, the target figures for the underrepresented gender only apply to ATP as ATP's subsidiaries are subject to other legislation than ATP.

2. Identification of risks and risk profile

The following three risks/consequences have been identified to either directly or indirectly affect diversity and inclusion:

- Compliance-related risks by not complying with national legislation.
- Reputational consequences by not meeting society's social responsibility expectations and norms.
- Negative financial consequences from failing to attract and retain competent employees.

To limit these risks and consequences, ATP must make every effort to ensure that the internal guidelines and applicable rules are always adhered to in order to avoid compliance risks as much as possible.

3. Diversity and inclusion

Diversity

ATP makes every effort to attract, strengthen and retain a diverse group of employees based on individual competencies and potential thus creating a company that appreciates and benefits from diversity. Through diversity, we can bring more perspectives and skills into play and ensure a wide range of competencies that provides better decision-making and benefit our business. This includes our innovation capacity and competitiveness as well as our customers and employees. This also means that we must make room for groups that need support in order to advance and thereby ensure equity for current and future employees.

At ATP, we acknowledge and recognise employees because of their differences - not despite them. We value each employee and there must be room for everyone regardless of gender, gender identity, gender expression, race, skin colour, religion or faith, political orientation, sexual orientation, age, functional impairment, education, experience, disability, or national, social or ethnic origins, etc. Diversity needs to thrive in everyday life and in our organisational culture across departments and management tiers. Only then, we can reflect the society we live in.

Inclusion

In order for diversity to thrive inclusion is fundamental. At ATP, we make every effort to create a respectful and inclusive organisational culture free from discrimination. Employees must feel heard, recognised and be able to freely express their opinions and perspectives. Only then employees can thrive, feel comfortable being themselves at work and create the best results.

4. Target figures for the underrepresented gender

The policy is anchored within ATP's Group Management. The policy is operationalized by ATP's Human Resource department, Communications department, and contributing business functions. The policy is integrated throughout the business.

With regard to the gender composition of ATP's Board of Representatives and Supervisory Board, it follows from Section 25 of the Danish ATP Act that one must aim for a balanced gender composition. This is to be interpreted as requiring the representation of at least one-third of each gender. Relevant organisations and the Danish Minister for Employment are responsible for fulfilling this requirement.

In the matter of the gender composition at top management levels, more specifically the two management tiers below the Supervisory Board, the aim, across departments, is to achieve a balanced gender composition, which is at least a 60/40 gender composition. All of ATP's business areas with a gender imbalance are obliged to move in a positive direction towards a more balanced gender composition while taking into account the industry and market.

5. Guidelines

ATP's expectations for employees and managers

As a company, ATP has an important role to play to ensure that both minority and majority groups thrive, that current and future employees have equal opportunities and that everyone can unlock their full potential.

At ATP, we require openness, curiosity, and the courage to dare and embrace differences. Since it is a joint responsibility to ensure that ATP succeeds in creating a diverse and tolerant workplace, both managers and employees are responsible for driving an inclusive, respectful, and safe work environment where diversity contributes to creating the best possible results for ATP.

People should never, neither in daily life nor in recruitment processes, experience discrimination at ATP. This is formalized in ATP's guidelines against abusive behaviour, bullying, sexual harassment, or other severe harassment, including harassment due to race, political orientation, or religious affiliation. If an employee is subjected to abusive behaviour, the person can contact a manager, their union, an employee representative, Human Resources or report the claim to ATP's external whistleblower system.

ATP is determined to create an inclusive and tolerant workplace by being considerate towards employees who experience difficulties or challenges due to health-related, social, or personal factors. If an employee is no longer capable of performing their job responsibilities for a period, ATP will, as far as possible, work to retain the employee by balancing their job role with their work capacity.

ATP's FASE programme contributes to ensuring diversity in the workplace. Through this programme, vulnerable groups, such as physically, mentally, or socially disadvantaged persons, are employed for a limited period to support them in returning to the labour market or pursuing an education. These employees are mainly men and women with a non-Western background, people suffering from mental health challenges, citizens undergoing an ability-to-work clarification process, and at-risk youth under the age of 30.

6. Reporting

The following annual reporting is submitted to ATP's Supervisory Board outlining the status of targets for the underrepresented gender. In addition, the Supervisory Board is also notified of key initiatives related to diversity and inclusion in ATP.

ATP's annual report must account for the status, policy, etc. cf. Section 24 in ATP's financial statement.

Additionally, an annual report to the Danish Minister for Employment must be submitted, cf. Section 11, subsection 5 of the Danish Gender Equality Act.

7. Dispensations options

None

8. Renewal

This policy must be submitted a least once yearly to the Supervisory Board to assess whether it is still adequate, including compliance with the policy. In the event of significant changes to the underlying assumptions fundamental to the policy, the policy must be adapted.