

Remuneration Report

ATP's Supervisory Board and Board of Representatives have adopted a pay policy that lays down rules for remuneration and a number of associated disclosure obligations.

PURPOSE OF ATP'S PAY POLICY

The overall purpose of the Pay Policy is to support ATP's vision of safeguarding the basic financial security for members in the longer term via, among other things, high returns and a simple administration process.

The Pay Policy also serves to support ATP's business model and commercial objectives, including making it possible, by means of a suitable remuneration structure, to attract and retain the best possible competencies on competitive terms of employment so that ATP's ambitious, long-term performance targets can be achieved.

All members of ATP's Board of Representatives, Supervisory Board and Supervisory Board committees, the CEO and members of the Group Management, the Chief Actuary, the Chief Compliance Officer and the Chief Auditor are paid a fixed salary. Members of the Group Management receive fixed remuneration, a pension contribution of up to 18 per cent and a number of work-related employee benefits, including a company car.

Remuneration and performance-related pay at ATP

There are two overall principles which ensure that the determination of the performance-related pay programmes and the payment of performance-related pay are done in a sound manner:

- No individual is involved in making recommendations or in structuring performance-related pay schemes applicable to themselves.
- It is independently checked that the programmes are managed in accordance with the determined frameworks.

BACKGROUND FOR ATP'S PUBLICATION OF THE REMUNERATION REPORT

Financial companies, including insurance companies, are required by law to publish a remuneration report. ATP is not subject to similar legal rules. The Recommendations on Corporate Governance, which ATP follows, previously included a recommendation on disclosure of remuneration reports before the recommendation was introduced in the legislation for financial companies. ATP prepares a report on remuneration for management, significant risk takers, etc. in ATP which fulfils ATP's disclosure obligations pursuant to Section 19 of the Danish Financial Supervisory Authority's Executive Order no. 1216 of 10 October 2018 on Pay Policy and Remuneration in ATP, which is published no later than 1 May and is therefore not available in connection with the publication of the annual report. On this basis, ATP publishes this remuneration report.

ATP's Supervisory Board defines general frameworks for the performance-based pay programmes in ATP via the Pay Policy.

The Supervisory Board has determined that ATP's CEO and Group Management, the Chief Actuary, Chief Risk Officer, Chief Internal Auditor, Chief Compliance Officer, Chief Operating Officer in Pensions & Investments, Head of Risk, and employees in Investments who have decision-making authority in relation to individual investments or decisive influence on strategic investment decisions are material risk takers.

The Supervisory Board has also determined that the ceiling for the variable salary for significant risk takers may not exceed 100 per cent of the base salary including pension contributions per year. The specific execution of frameworks will be determined by the CEO (Chief Executive Officer) and the CIO (Chief Investment Officer).

There is a performance-based pay programme in Investments, according to which portfolio managers in ATP's investment department (Investments) can have their fixed salary supplemented with a performance-based bonus. The programme has different weights based on the individual employee's degree of meeting targets for 3 components: 1) ATP's investment result, 2) individual contribution and performance, and 3) the department's contribution and performance. The programme is risk-adjusted so that the absolute level of risk and thus the absolute return is not of critical importance for the programme, which means that there is no incentive for employees to increase risk.

When determining the performance-related bonus, consideration is also given to whether the employee has contributed to supporting non-excessive risk-taking with regard to sustainability risks by integrating sustainability risks into ATP's investment decisions in accordance with applicable legislation and the Policy for Responsibility in Investments in the ATP Group.

Group Management remuneration

DKK million	2023	2022	2021
Group Management end of year 2023			
Martin Præstegaard, CEO (Chief Executive Officer)	7.0	3.5	-
Martin Præstegaard, Deputy CEO and Chief Financial Officer (CFO)	-	2.3	4.4
Mikkel Svenstrup, Chief Investment Officer (CIO)	4.7	4.5	4.3
Anne Kristine Axelsson, Executive Vice President, Pension & Labour market	3.0	2.8	2.8
Kristine Stenhuus, Executive Vice President, Udbetaling Danmark – Public Benefits Administration	3.0	0.4	-
Haktan Bulut, Executive Vice President Information, Digital Solutions (CITO)	3.0	0.7	-
Pernille Vastrup, Executive Vice President Corporate Functions, P&I Finance and Business Support (CFO) ¹	1.8	-	-
Departed Group Management end of year 2023			
Kim Kehlet Johansen, Executive Vice President, Risk Management & Compliance and Chief Risk Officer (CRO) ²	4.5	4.3	4.0
Bo Foged, CEO (Chief Executive Officer)	-	4.7	7.3
Carsten Bodal, Executive Vice President, Udbetaling Danmark	-	5.9	2.7
Annemette Moesgaard, Executive Vice President, Communication & External Relations	-	-	3.7
Total Group Management ³	27.0	29.1	29.2

¹ Joined 1 April 2023

² Left 31 December 2023

³ Members of the Group Management receive fixed remuneration, pension contribution and a number of work-related employee benefits including a company car. Members of the Group Management are not remunerated through incentive programmes, but in special cases have the opportunity to receive a one-off payment.

Group Management remuneration in 2023

Total remuneration for the Group Management in 2023 was DKK 27.0 million, which is a decrease of DKK 2.1 million compared to 2022. This decrease is due to several off-setting factors, primarily changes in management composition in 2022 which had full cost impact in 2023.

Martin Præstegaard joined the company on 1 July 2022 as CEO from a position in ATP as CFO and Deputy CEO. As the new CFO, Pernille Vastrup joined on 1 April 2023.

The Group Management was also changed by Carsten Bodal being replaced by Kristine Stenhuus, who on 15 November 2022 became the new Executive Vice President for Udbetaling Danmark Public Benefits Administration.

In order to strengthen the focus on digitalisation and IT in

the organisation, the Group management team was supplemented with an Executive Vice President for Digital Solutions (CITO), Haktan Bulut, who stepped into the role on 1 October, 2022

Kim Kehlet Johansen resigned on 31 December 2023 and was replaced by Jacob Lester on 1 January 2024 as the new Chief Risk Officer.

Principal contents of severance schemes

Under their contracts, each member of the Group Management has a 12-month period of notice. The CEO (Chief Executive Officer) has a 12-month period of notice. In addition, when stepping down after 12 and 17 years, 1 and 3 month's salary is paid, respectively, although the termination period and any potential severance pay package can, at most, amount to 24 months of salary.

Significant risk takers

DKK million	2023 ¹	2022	2021
Fixed remuneration	58.0	97.4	96.2
Variable remuneration	0.0	7.5	13.3
Variable remuneration, prior year adjustment	0.0	0.0	0.1
Total remuneration	58.0	104.9	109.6
Number of recipients of fixed salary	21	60	52
Of which recipients of variable salary	0	31	28

¹From 2023, the assessment of significant risk takers has been adjusted. A group of employees who were previously assessed as significant risk takers must all have their trading actions authorised. These employees are therefore not considered significant risk takers.

Significant risk takers

Variable pay comprises variable pay during the financial year and provisional bonus by the end of the financial year. Final bonus determination does not take place until the first quarter of the following

financial year. The difference between the provisional bonus and final bonus is recognised under 'Variable remuneration, prior year adjustment'.

Remuneration paid to ATP's Supervisory Board and Board of Representatives

DKK million	2023	2022	2021
Total remuneration for the ATP Supervisory Board	2.3	2.2	2.1
Total remuneration for ATP's Board of Representatives	0.3	0.3	0.3
Total remuneration for ATP's Executive Committee	0.3	0.3	0.3
Total remuneration for the ATP Audit Committee	0.3	0.3	0.3
Total remuneration for to the ATP Risk Committee	0.3	0.3	0.3

Annual remuneration in DKK thousands paid to:

Chairman of the Supervisory Board (total remuneration)	854	825	802
Member of the Executive Committee	95	92	90
Member of the Supervisory Board (including remuneration for the Board of Representatives)	143	138	135
Member of the Board of Representatives	16	15	15
Chairman of the Audit Committee	94	90	88
Member of the Audit Committee	72	69	67
Member of the Risk Committee	72	69	67

Remuneration for the ATP Supervisory Board

DKK thousand	Supervi- sory Board	Executive Committee	Audit Committee	Risk Committee	Total 2023	2022	2021
Chairman of the Supervisory Board:							
Torben M. Andersen	615	95	72	72	854	825	802
Employer representatives:							
Anne Gram ²	35	-	-	17	52	-	-
Jacob Holbraad	143	95	72	-	310	300	294
Lars Sandahl Sørensen	143	-	-	-	143	138	135
Anne Broeng ¹	48	-	-	24	72	208	202
Brian Mikkelsen	143	-	-	-	143	138	135
Vibeke Krag	143	-	-	72	215	208	202
Mogens Nørgård	143	-	-	-	143	104	-
Peter Rahbæk Juel	-	-	-	-	-	35	135
Employee representatives:							
Lizette Risgaard ^{*3}	51	34	26	-	111	300	292
Bente Sorgenfrey ^{*4}	36	-	-	-	36	138	135
Jonas Schytz Juul [*]	143	-	-	-	143	138	45
Anja C. Jensen [*]	143	-	-	-	143	127	-
Lisbeth Lintz [*]	143	-	-	-	143	125	-
Morten Skov Christiansen ^{*5}	92	61	46	-	199	-	-
Ingelise Buck ^{*6}	107	-	-	-	107	-	-
Jan Walther Andersen	143	-	94	72	309	298	279
Arne Grevsen	-	-	-	-	-	-	67
Kim Simonsen	-	-	-	-	-	-	112
Lars Qvistgaard	-	-	-	-	-	-	135
Total	2,271	285	310	257	3,123	3,082	2,968

¹ Left 30 April 2023

² Joined 5 October 2023

³ Left 9 May 2023

⁴ Left 31 March 2023

⁵ Joined 10 May 2023

⁶ Joined 1 April 2023

*Remuneration is paid to the organisation that has nominated the Board member