

The ATP Group

Responsibility 2025

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Sustainable change is created within companies

ATP was established to ensure that Danes receive the best possible lifelong pensions, but as a major investor, we also want to contribute to the development of society when this can be done in line with the statutory purpose that forms the very foundation of ATP.

As an example of this work, ATP announced back in 2021 its ambition to reduce the CO₂ intensity of our equities by 70 per cent in 2030 compared with 2018.

We have made considerable progress in this area, and CO₂ intensity has already fallen by 52 per cent – on paper, at least. This is quite good, but there is an important caveat, which we have analysed in a comprehensive evaluation of ATP's sustainability efforts.

Since CO₂ intensity is a relative objective based on investment turnover, the decline does not actually contribute to ensuring a more viable planet for future generations. If, for example, a company's turnover increases as a result of inflation, its relative emissions will fall – without the company necessarily reducing its emissions, and thus the real figures will not move in the desired direction.

We want our efforts to have a real impact, which is why we adapt the methods we use as investors to reduce the negative effects of the companies we invest in.

STATUTORY REPORTING

The report is ATP's statutory report on responsibility and covers the period 1 January 2025 to 31 December 2025, cf. Section 23 of the Executive Order on Financial Reporting by the Danish Labour Market Supplementary Pension Fund (ATP). The report also includes ATP's statutory report on the status of compliance with the target figures set for the underrepresented gender, cf. Section 24 of the Executive Order on Financial Reporting by the Danish Labour Market Supplementary Pension Fund (ATP) and diversity policy, cf. Section 25.

The reports are part of the management's review in ATP's Annual Report for 2025.

ATP's sustainability-related information and information on the EU taxonomy for environmental sustainability are available at atp.dk

The adjustment also means that we are saying goodbye to our financial ambition for 2030, which, viewed in isolation, does not contribute to concrete green changes. We will continue to invest in the green transition when it makes sense for returns, but we will also sell again when the timing is right.

Our job is to create robust pensions, but when we can influence companies to move in a more sustainable direction without compromising that goal, we do so. This requires a strategy based on how things really are.

We have looked at the levers we have as investors when trying to influence the world around us towards a greener direction. Do we exclude "brown" companies, or do we invest more specifically in green solutions? Do we try to influence individual companies through dialogue, or do we try to influence broader framework conditions? We have weighed each individual lever against the statutory role that ATP plays in Danish society, and for us, the conclusion is clear:

The most direct and robust way to create real sustainable impact is by working with companies' specific behaviour through our stewardship. Our new sustainability strategy therefore also states that it is within companies that the necessary changes and CO₂ reductions can and must take place – not just on paper in a financial portfolio.

For this reason, we will focus on individual companies and monitor whether they are delivering concrete and actual reductions. There may be good reasons why a company's emissions are increasing – but we want to hear the good reasons and challenge the poor excuses.

In addition to the work on CO₂ emissions, there are other areas where more results are needed. Because sustainability challenges are numerous and complex, priorities must be set. This means that in our sustainability strategy, we have chosen to focus on three sustainability themes in our stewardship: Green transition, working conditions and governance practices.

For all three themes, the core of ATP's sustainability efforts in the future will be concrete and realistic. If the world is to get back on track, this will require hard work on the part of businesses. This work is ATP's sustainability strategy, which has been put in place to serve as both a catalyst and an evaluator.



Business Model

ATP has optimised its business model in recent years. This is a result of ATP's objective to be an important contributor to the basic financial security of people in Denmark by providing stable, guaranteed lifelong pensions, and to contribute to increasing the real value of these pensions. The objective of the overall changes to the business model for ATP Livslang Pension (Lifelong Pension) is to achieve both higher pensions in absolute terms and ensure better opportunities for increasing and preserving their real value.

The changes in the business model are comprised of two parts. Life annuity with market exposure was introduced in 2022 (see the Annual Report for 2022) and a new hedging strategy was introduced in 2023.

The changes to the hedging strategy are based on ATP's existing interest hedging, with the addition of a long-term market risk for hedging in the form of riskier assets to provide better opportunities to increase the real value of the pensions.

The changed hedging strategy is based on two special features regarding the Danish Labour Market Supplementary Pension Scheme: The payments stretch far into the future and the funds are only paid to members as they begin to retire. This means that the part of the assets that is to provide the guaranteed pensions is invested with a long-term focus where ATP assumes a higher investment risk than with pure interest hedging. The objective is to achieve higher returns over time as a supplement to the current interest hedging, while continuing to ensure that ATP is extremely likely to be able to honour the guaranteed benefit payments.

As a consequence of the illiquidity in the liabilities, ATP must – in accordance with international accounting standards (implementation of new standard IFRS17) – from 2023 measure the value of the pension liabilities taking into account the illiquidity therein. Therefore, ATP adds an illiquidity range to the discount curve for the purpose of measuring the value of the guaranteed pensions, which are then reduced by DKK 37bn at the beginning of 2023. ATP has chosen to allocate the funds that are

released in this way to a Long-term Supplementary Provision (LSP), while establishing a Supplementary Hedging Portfolio with long-term risk taking as part of the overall hedging. Over time, the returns from the Supplementary Hedging Portfolio are expected to be able to be transferred to the bonus potential and thus contribute to increasing the real value of the lifelong pensions. ATP must also calculate a surcharge – risk adjustment for non-financial risks – to pension liabilities as a consequence of the implementation of the new international accounting standard IFRS17. This supplement amounts to DKK 1.0bn and is an expression of the funds that ATP needs to reserve to assume non-financial risks.

Two new items have thus been introduced under pension provisions: Long-term supplementary provision and risk adjustment.

ATP's pension provisions will then consist of pension liabilities and undistributed funds. Pension liabilities are distributed to members either as a guaranteed pension or a life annuity

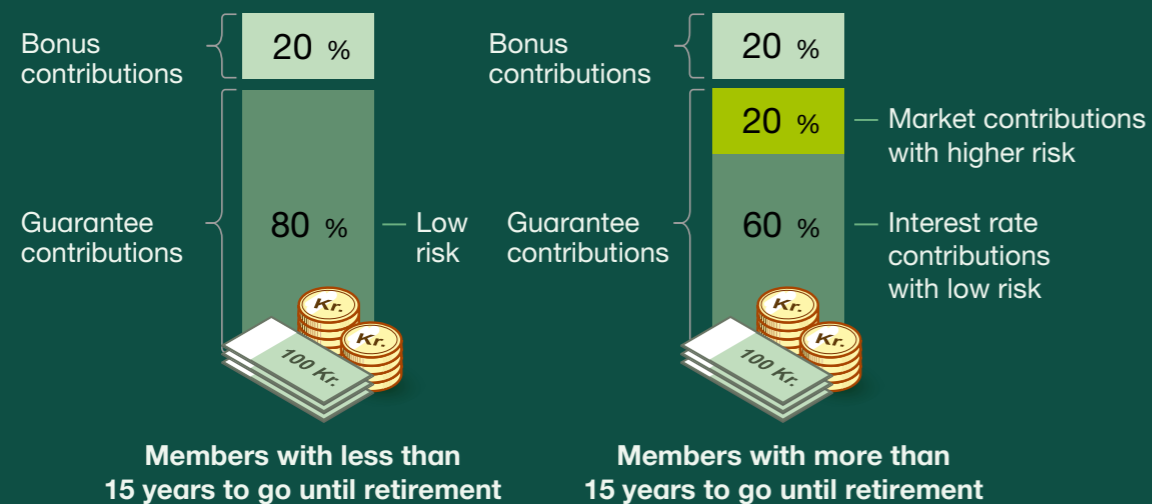
with market exposure subject to a risk adjustment for non-financial risks.

ATP's undistributed funds form the remaining part of the pension provisions and consist of the bonus potential and the long-term supplementary provision.

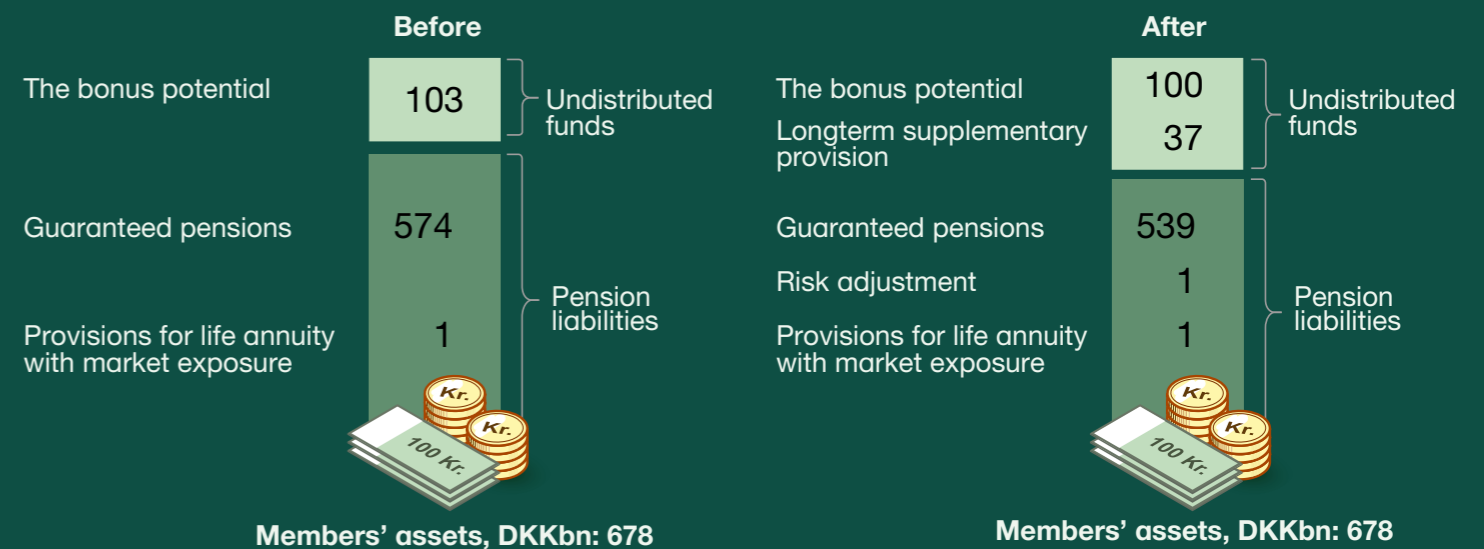
The new balance sheet items will generally not change the value of the members' total assets. All of ATP's assets belong to its members, either as distributed or non-distributed funds.

The purpose of the new accounting standard is to create transparency about companies' earnings. ATP makes no profit by providing services, which is why ATP's profit will always be 0.

Implementation of life annuity with market exposure in 2022



Pension provisions before and after changes, start of 2023



Policies and governance

To ensure management ownership of responsibility in ATP's investment decisions, ATP's Supervisory Board has decided that the responsibility efforts are to be coordinated by a Committee for Sustainability.

The Committee is chaired by the CEO and other members are the CIO (Chief Investment Officer) and the CRO (Chief Risk Officer) as well as relevant managers within and outside the investment organisation. The Committee Secretariat is served by Team ESG, which is part of the Investment department. The administration regularly reports to the Supervisory Board on work regarding sustainability in investments.

ATP's Supervisory Board has adopted a sustainability strategy that should be viewed in conjunction with ATP's ESG policies.

ATP'S ESG POLICIES

Policy for sustainability in investments

ATP's policy for sustainability in investments constitutes the overall framework for the work on responsibility across asset classes and investment methods.

The aim of the policy is to ensure that ATP also includes considerations for the environment, climate, human rights, labour rights, anti-corruption and management issues in its risk management and investment processes in line with other business conditions and risks.

In ATP's policy on sustainability in investments, the Supervisory Board sets out some basic principles and minimum criteria for the conduct of portfolio companies based, among other things, on the OECD Guidelines for Multinational Enterprises.

Among other things, the policy states that ATP does not invest in companies that deliberately and repeatedly violate the rules and regulations of the countries in which they operate. The policy also states that the portfolio companies must act in accordance with the standards that follow from the international conventions adopted by Denmark.

Policy for stewardship

ATP's policy for stewardship describes the principles and processes that guide ATP's stewardship work. As a responsible long-term investor, ATP has an interest in investors as

owners of listed companies being able to understand and control the companies' overall actions, thereby promoting the companies' long-term value creation.

Tax policy for investments in the ATP Group

ATP's tax policy for investments describes ATP's approach towards tax on investments. Our tax policy is aimed at making our investments more robust against tax-related risks and to ensure that we take a co-responsibility for strengthening the governance in this area.

IDENTIFYING RISKS AND THE DESIRED RISK PROFILE – EXTRACT FROM THE POLICY FOR SUSTAINABILITY IN INVESTMENTS

'ATP views sustainability-risks similarly to other investment-related risks, including market risks. We view sustainability risks the same as we view intangible assets such as goodwill, brands and intellectual property rights where the valuation is subjective.

ATP's work with sustainability risks indicates that the measurement methods, data, etc. used to assess the impact on the value of investments are not as developed as they are for traditional risk factors. Therefore, there can neither be identified or made a nuanced and specific assessment of how various sustainability risks materialise across investment types in the same way as can be done for traditional financial risks. For this reason, at present sustainability risks cannot be primary guidelines in the work with investments and risk management.

Therefore, the work involves a more general and holistic approach to the assessment of sustainability risks. As is the case with other investment risks, ATP strives to identify ESG related risk sources and assess to which degree ATP is compensated.

ATP is continually working on improving its opportunities for integrating sustainability risks by developing and testing new methods such as, for example, when working with climate data which ATP assesses is the area that has seen the most progress.'

TWO ESG TRACKS IN ATP'S INTERNAL GOVERNANCE

Key decisions within the framework of ATP's Supervisory Board's policy for sustainability in investments



Sustainability Committee

The Sustainability Committee discusses fundamental decisions in the ESG area, and it is in this forum that decisions related to ATP's policy for sustainability in investments are made. This includes decisions on company exclusions and other ESG matters. The Committee for Sustainability is chaired by ATP's CEO with the participation of the Chief Investment Officer, Chief Risk Officer, etc.

Specific investments



Investment Forum

ESG is an integral part of ATP's investment processes and therefore all ESG decisions on specific investments are pre-processed in the Investment Forum, after which ATP's Chief Investment Officer makes the final investment decision. This ensures that ESG issues are part of the investment due diligence processes, just as the anchoring in the Investment Forum also ensures that specific ESG decisions are archived along with the rest of the investment's documentation so that follow-ups can be made during ATP's period of ownership. The final investment decision is made by ATP's Risk and Investment Committee.

ATP's sustainability strategy

The sustainability challenges facing the world are complex and there are rarely any easy or clear-cut solutions. ATP is committed to being an active partner in addressing sustainability challenges, with the ambition of making a real impact on the world around us. We do so because we want to help drive sustainable improvements, but also because we believe that companies that improve their sustainability performance are better investments for us in the long term.

ATP's sustainability strategy is based on the principle that a pension company like ATP must take responsibility. Responsibility for ensuring good pensions for our members. But also contribute to the world developing in a sustainable direction. This requires us to take a long-term view and continuously work to ensure that things move in the right direction year after year.

At the same time, we also see a world where agendas such as defence and basic security are becoming increasingly prominent. This means that the sustainable solutions can come into conflict with other legitimate considerations that must also be balanced.

As a pension company, ATP must provide good pensions for all Danes. As a result, sustainability measures must always go hand in hand with good returns. This is a necessary prerequisite for ATP's sustainability work.

The complexity is high when viewed through a global investment portfolio. The sustainability challenges involve great risks as well as opportunities for an investor – both in terms of the possibility to protect and enhance the value of the investment portfolio and in terms of ways of exerting influence and making a real contribution to sustainable development.

ATP has been working with sustainability in our investments for many years, during which we have gained experience with a range of different ESG levers. This experience comes both from our own work as an investor and from many years of observing companies' sustainability efforts, and we want to leverage on that.

Our experience is that stewardship is the most significant lever for ensuring that value creation goes hand in hand with a real sustainability impact.

Since sustainability challenges are many and complex, it is necessary to set priorities. This does not keep us from addressing other areas, but it means that we have chosen to focus on three sustainability themes in our stewardship: green transition, working conditions and governance practices.

All three topics are important. They are important in delivering strong long-term financial results across individual investments, and they are important for building a better world that is sustainable in the long run.

Based on our knowledge of companies' own reporting, it is ATP's assessment that these three themes are material for all companies. The themes are also recognised as financially material in academic papers, and all three are subject to extensive regulation.

For the three focus areas, we want to see improvements in the companies within our portfolio. For ATP, therefore, it is not a question of whether we are invested in one sector or another, but that all companies in our portfolio improve.

Finally, it is our experience that it is important to be specific in our work. This means that we must be able to measure whether the individual companies are on the right track. We therefore need robust data points with wide data coverage that are unambiguous enough to clearly show whether a company is on the right track.

On this basis, we have defined a guideline for each of the three themes allowing us to constantly track and report on the development of our portfolio companies. We will continuously evaluate whether we can introduce additional valid guidelines for the three themes, with the aim of tracking the development of our portfolio companies.

ATP's sustainability approach

Who are we?

We are a stable and leading player, leveraging data, knowledge and insight to make a real impact on the world's sustainability challenges guided by our purpose of providing good and stable pensions.

What is our starting point?

ATP's business model provides the framework for how our investments can contribute to addressing long-term and complex sustainability challenges, with stewardship as the primary tool for driving real improvements that benefit both ATP's investments and society.

What do we want?

We strive for all of ATP's portfolio companies to improve on ATP's three priority sustainability themes over time from their own starting point. We track the development of the companies using specific, data-supported sustainability guidelines and report annually on progress against these guidelines.

Theme	Guideline
Green transition: The companies' contribution to mitigating climate change and related sustainability issues such as biodiversity and circular economy as well as their work to future-proof their business.	Companies must continuously reduce their absolute CO ₂ emissions
Working conditions: The company's approach to their employees with a focus on ensuring good and safe conditions through a value-creating approach to employees.	Companies must limit the number occupational accidents
Governance practices: Ensuring responsible and effective management in the companies with a focus on broad recruitment across the board and other management tiers.	Companies must increase diversity in the management tiers

ATP's sustainability strategy should be viewed in the context of ATP's policy for sustainability in investments, policy for stewardship and tax policy for the ATP Group. The sustainability strategy in its entirety is available at atp.dk.

Sustainability Strategy

Focused themes reduce complexity

ATP's primary purpose is to provide guaranteed lifelong old-age pension and, if possible, to maintain the real value of the pensions. The work to ensure sustainability in investments should always be aligned with this purpose. In addition, the focus of our sustainability work is that it must have a real impact on the companies we invest in and therefore also have a positive impact on the external environment.

For ATP as an investor, real impact is about working at company level, because it is in the companies that the changes need to happen. That is why ATP does not set goals at portfolio level as it is our experience that positive and negative movements cannot be translated into a real impact on sustainability challenges.

Real impact must happen in the real economy and not in an investor's statement of financial position. A portfolio's carbon footprint may shift if ATP sells its holdings in Mærsk and buys equities in Danske Bank instead. This will neither make Mærsk nor Danske Bank more or less green, but ATP's portfolio will have a lower carbon footprint.

ATP is a pension company for all Danes, and we acknowledge that when it comes to sustainability, there are many subjective opinions on what an investor like ATP should do. These opinions will change over time as the world moves forward. ATP's sustainability work must therefore build on data, knowledge and insights rather than be based on opinions. This enables us to maintain a role as a stable and leading player in sustainability investments where professionalism is at the forefront.

As an institution, ATP has worked with ESG and sustainability in investments for more than 20 years and has therefore continuously gained experience from various actions.

Our experience and clear starting point is that stewardship is the best tool for influencing companies and thereby working to change their practices. ATP also uses other ESG levers, but they will serve as a supplement to the stewardship work.

Sustainability work is complex and as an investor with a diversified portfolio, we are exposed to sustainability challenges in many different companies. In ATP's experience, this work should be prioritised so that we build experience and knowledge within specific themes.

At the same time, we must select ESG areas where we believe that it is both beneficial for the individual company financially and for society that the area develops positively.

Finally, it must be possible to follow up on the de facto developments so that we can assess whether progress is actually being made in the area in the individual companies.

By focusing on selected themes, we send clear signals to the companies about our expectations so that the companies can also prioritise the way they use their resources. This does not mean that we do not consider other themes, but we have selected three themes based on the above, which have a strategic focus in our work.

The three themes we focus on are:

- **Green transition**
- **Working conditions**
- **Governance practices**

Based on our knowledge of the companies' own reporting, it is ATP's assessment that these three themes are material for virtually all companies. The themes are also recognised as financially material in academic papers, and all three are subject to extensive regulation.

ATP's focus themes

Green transition

Is about the companies' contribution to mitigating climate change and related sustainability issues such as biodiversity and circular economy as well as their work to future-proof their business. Climate change impacts companies broadly and very differently depending on their business model and the companies will therefore have different lines of action. Biodiversity is closely linked to climate change as something that is bad for the climate often has a negative impact on biodiversity, e.g. deforestation. Similarly, circular economy is about using our resources better, which will ultimately lead to products and consumption having a lower carbon footprint.

Working conditions

This is about the company's approach to their employees with a focus on ensuring good and safe conditions through a value-creating approach to employees. Employees play a value-adding role just as financial and physical capital in terms of their overall competences and productivity, which includes their training and experience but also their motivation and well-being. This means that a company can impact its employees positively, e.g. through training, workplace improvement initiatives or a strong organisational culture but also negatively, such as by treating its staff poorly and thereby harming their motivation and productivity.

Governance practices

This is about ensuring responsible and effective management in the companies with a focus on e.g. broad recruitment across the board and other management tiers. A good board makes well-considered and long-term decisions that create long-term value for shareholders. It is therefore important that the boards have a broad composition of profiles with different perspectives and competences as is the case for the company's other management tiers. Governance practices also concern pay policy and shareholder communication, meaning that these elements also help ensure long-term value creation in the company.

Improvements on specific benchmarks

ATP basically wants all our portfolio companies to improve on all three themes over time from their own starting point, while respecting that they have different starting points and challenges.

The dialogue is therefore not about whether the companies have activities in one or the other industry but whether they are improving from their own starting point. A company that comes from a 'bad' starting point can thus develop positively, while a company with a 'better' starting point can develop negatively.

The direction the company takes is important when ATP is prioritising its stewardship. If things go in the wrong direction, the company can benefit from the attention of its investor, while companies developing positively need more peace to work.

In order for us to be able to reliably follow the company's development, specific guidelines must be selected within the three themes where the development can be supported by data. This provides a good basis for dialogue with the companies with a view to following up on their development.

It is important to select the benchmarks carefully so that the companies know exactly what we ask them to improve and so that it is evident to us and the external environment whether the companies actually improve.

In our experience, only very few data points currently have wide coverage within companies, are widely recognised and allow developments to be tracked. As a central part of this sustainability strategy, ATP will continue to work to improve data coverage on the most central and essential sustainability issues in companies.

ATP will start our work based on three central, data-supported sustainability guidelines that are important across sectors. We continuously track the development in sustainability data and assess whether more sustainability benchmarks are sufficiently mature to become an ATP guideline. The ambition is to be able to add more benchmarks in the future within the individual themes.

We will continuously monitor the development of guidelines and engage in a dialogue with those companies that do not move in a positive direction on a given guideline. In these cases, we will listen to the companies' explanation, including how each company expects to change the development in a positive direction.

A negative development may have a good explanation, and ATP will take this into account in our dialogue with the companies. However, not all explanations are equally good, and they should not become bad excuses. That is why we will regularly compare explanations from different companies, e.g. companies in the same sectors.

ATP's guidelines

Green transition

Companies must continuously reduce their absolute CO₂ emissions.

This guideline focuses on the companies' absolute emissions rather than relative targets such as carbon footprint, which are normalised based on e.g. revenue. We have chosen this because the relative targets can be obscure. For example, a company's emissions can be increasing but its carbon footprint can be decreasing if its revenue increases accordingly. Although it is typically positive if a company reduces its carbon footprint, the climate issue can only be solved through a global reduction in absolute CO₂ emissions. Increased business scale and lack of regulation can make this guideline challenging for the individual company. In the long term, all companies must move towards carbon neutrality by 2050.

Working conditions

Occupational accidents in the companies must be decreasing.

This guideline focuses on the total annual number of occupational accidents in the company. ATP has chosen this measurement metric over relative targets such as the occupational accident rate or frequency which may be more difficult to understand and do not show the actual extent of occupational accidents in a company.

The guideline has an intuitive ultimate target for the number of occupational accidents that applies to all companies, but also takes into account that the incidence of occupational accidents varies in different sectors and regions. As part of the guideline, we will also follow up on each of the, thankfully, rare cases where occupational accidents have fatal outcomes.

Governance practices

Companies must increase diversity in the management tiers

The guideline looks at the proportion of the underrepresented gender on the companies' boards and the proportion of the underrepresented gender across all management positions in the companies. If we are to increase diversity in the top management tiers, we must also focus on diversity in the lower management tiers. In creating the guideline, we have applied recent Danish and European regulations, and ATP's expectation is that the companies will gradually approach gender balance at each tier, if this has not already been achieved.

Status of green ambitions

Sustainability strategy replaces climate ambitions from 2021

In 2021, ATP announced a series of climate ambitions. In connection with the launch of the new sustainability strategy, which focuses on concrete and measurable changes in ATP's portfolio companies, we have decided not to pursue these

ambitions. As part of the transparency surrounding our work, we conclude the process with a status report on our ambitions.

Ambition of having DKK 100/200bn in green investments in 2025 and 2030, respectively

At the end of 2025, ATP had DKK 78.6bn in green investments. This represents an increase of more than DKK 17bn compared to 2021, when the ambition was announced. Although we have not reached DKK 100bn, we are pleased to see that, despite the major challenges facing green investments in general, we have come a long way.

ATP's ambitions were announced with a number of conditions. In 2021, ATP clarified that the following conditions applied to ATP's ambitions:

- Efforts to meet the climate ambitions take place within the framework of the prudent person principle and the requirement that ATP must invest its assets in a way that best serves the interests of its members.
- Changes in, for example, market conditions, including interest rate fluctuations, may give rise to a reassessment of ATP's climate ambitions
- The ambition for green investments is subject to uncertainty, partly because the size of ATP's statement of financial position is sensitive to changes in interest rates.

In the years since this ambition was announced, interest rates have risen steeply. Due to interest rate rises, ATP's assets have fallen by almost DKK 250bn since the beginning of 2022. This can primarily be attributed to a decline in the value of the bond portfolio that hedges ATP's guaranteed pension liabilities.

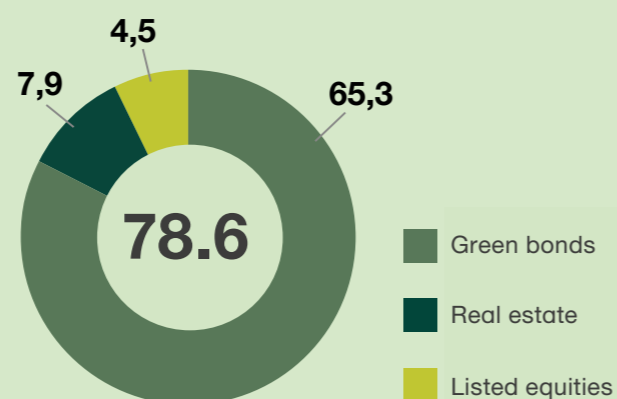
Since October 2021, ATP has purchased green investments worth DKK 64.7bn and sold investments worth DKK 35.2bn.

Besides significant preconditions not being present, we have experienced that targeted financing – understood as specific goals or ambitions to maintain a certain volume of given investment types at particular points in time – is not an effective management tool when managing trust funds where return is the primary concern.

ATP is therefore not maintaining its ambition for 2030. However, we will still publish ratios on our green investments.

We will continue to invest in green activities, provided there are market opportunities with a favourable balance between return and risk.

Distribution of ATP's green investments in 2025, DKKbn



Ambition for all portfolio companies to report CO₂ emissions by 2025

We are pleased that virtually all companies in our Danish equity portfolio now report their CO₂ emissions. Similarly, there have also been significant improvements in the foreign portfolio, with more companies reporting and the quality of reporting improving significantly. We are pleased to have come this far, greatly aided by general developments in reporting – even if certain markets, particularly China, still have room for improvement.

Ambition to reduce CO₂ emissions by 70 per cent in 2030 for listed equities and corporate bonds compared to a 2018 baseline

ATP's ambition was a 70 per cent reduction in CO₂ intensity for ATP's equity portfolio by 2030 compared with 2018, when CO₂ intensity was 32.1 tCO₂e/mDKK. ATP's ambition for 2030 is therefore 9.6 tCO₂e/mDKK. At the end of 2025, CO₂ intensity was 15.4 tCO₂e/mDKK. This means that ATP will have achieved a reduction of 52 per cent by 2025 compared to 2018.

ATP believes that it will be able to achieve this ambition by 2030 without major difficulties, but that this will not necessarily lead to real reductions in emissions in ATP's portfolio companies and thus in the real economy. For this reason, ATP will focus on individual companies' efforts to reduce their absolute emissions rather than taking a relative portfolio approach.

As we have explained in previous reports, CO₂ intensity is a relative metric that compares emissions to turnover figures, which means that it is not possible to say with certainty that these are real emission reductions. Similarly, choices made in the portfolio can reduce CO₂ intensity without leading to actual emissions reductions. In 2021, ATP restructured its corporate bond portfolio to consist solely of green bonds, which is why this ambition is not relevant for this part of the portfolio.

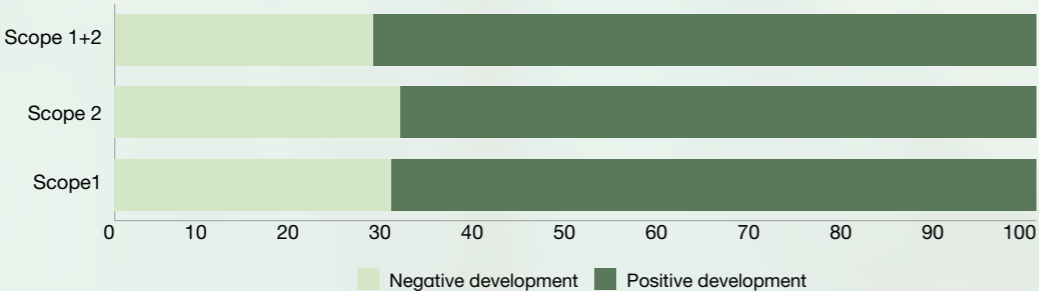
Ambition for carbon neutrality in the investment portfolio in 2050

ATP wishes to continue contributing to carbon neutrality in its portfolio companies. Going forward, ATP will work to ensure that our individual portfolio companies become carbon neutral as soon as possible and no later than 2050.

Sustainability guidelines

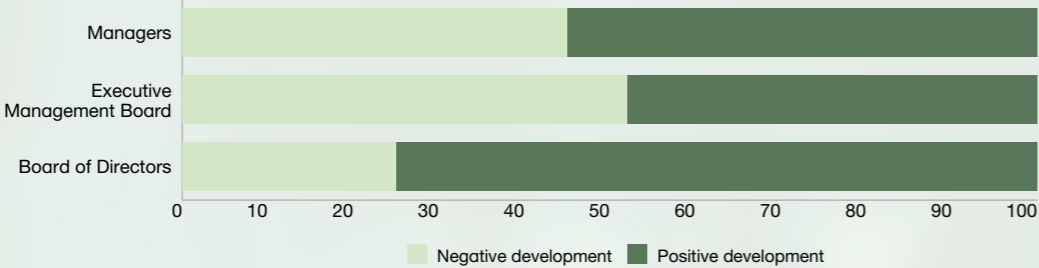
Status of guidelines

COMPANIES MUST REDUCE THEIR ABSOLUTE CO₂ EMISSIONS (SCOPE 1+2)



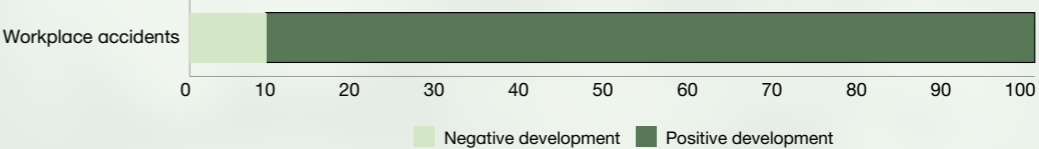
Most emissions come from a few companies – over 60 per cent of emissions in ATP’s portfolio come from 25 companies. This applies in particular to sectors such as utilities, materials and energy. We can see that it is particularly high-emission companies that ATP focuses on that have been able to reduce their emissions over a two-year period. We monitor developments in scope 1 and 2 separately, as well as total emissions. Scope 3 is currently not considered useful for this method.

COMPANIES MUST INCREASE DIVERSITY IN THE MANAGEMENT TIERS



*ATP provides figures for the under-represented gender at the executive level, but as executive boards can be very small (1-2 people), it is not meaningful to use this method to monitor developments. Therefore, ATP discloses the gender diversity figures but does not enter into an annual dialogue with all companies regarding negative developments.

OCCUPATIONAL ACCIDENTS IN THE COMPANIES MUST BE DECREASING



ATP focuses on occupational accidents and monitors occupational accidents across our portfolio companies. As these are specific sectors with high rates of occupational accidents, ATP focuses primarily on these sectors. The number of fatal accidents is not a guideline figure for ATP, but as it is closely related to occupational accidents, it is natural for ATP to monitor developments in this area as well. In 2025, there were fatal accidents in 27 of the portfolio companies covered.

THE METHOD RELIES ON COMPANY-REPORTED DATA

If ATP wants to monitor development at a company level, it does not make sense to use estimated data on company emissions. Therefore, the graphs above only show companies for which ATP has data. ATP has processes in place for contacting companies that do not disclose carbon emissions, occupational accidents or diversity figures, and encouraging them to report publicly on these issues. This is especially true in areas with a low degree of transparency on ESG issues.

For this reason, the figures above do not cover ATP’s entire portfolio, just as we do not apply the method to fund investments (where data coverage is low). Negative development includes both declining and non-improving companies. You can find more details about this in the methodology section of the report.

ATP’s Committee for Sustainability determines which of ATP’s portfolios are covered by the sustainability strategy.

Climate

Carbon accounting for investments

For ATP's liquid equity portfolio, we can see that total scope 1 and scope 2 emissions this year have increased by approximately 43 per cent. This is because our equity portfolio in 2025 will be 40 per cent larger than at the end of 2024, with the international equity portfolio showing the strongest growth. Total Scope 1 emissions have increased by approximately 55 per cent in international equities, while they have only increased by 23 per cent in Nordic equities.

Although ATP's absolute emissions have increased, this does not mean that emissions in the real economy have increased correspondingly, as it primarily reflects the fact that ATP has purchased additional equities in companies.

We can also see that the CO₂ intensity of international equities has increased, while that of Nordic equities has decreased. This is because equities with higher scope 2 emissions have been purchased in the international portfolio.

For the Nordic portfolio, we generally see small declines in the various other relative metrics. This can be explained by smaller emission reductions from emission-heavy companies and minor changes in the portfolio composition.

As described in our sustainability strategy, ATP places less emphasis on developments in our own carbon footprint and

CO₂ accounting for illiquid investments

2025	Total emissions		Carbon Footprint		Carbon Intent.		WACI	
	tonnes CO ₂ e	Developments from 2024	tonnes CO ₂ e/	Developments from 2024	tonnes CO ₂ e/	Developments from 2024	tonnes CO ₂ e/	Developments from 2024
Total, MB	128,983	(0.9%)	2.80	16.1%	7.52	(10.0%)	7.08	27.9%
Total, LB	134,531	(2.2%)	2.92	14.5%	7.85	(11.1%)	7.89	36.6%
Scope 1	82,999	(17.8%)	1.80	(3.8%)	4.84	(25.3%)	3.00	(2.0%)
Scope 2, MB	45,984	57.8%	1.00	84.8%	2.68	43.3%	4.08	64.9%
Scope 2, LB	51,532	41.0%	1.12	65.1%	3.01	28.1%	4.89	80.2%
No. of companies*	231		231		224		237	

* ATP does not necessarily have access to all financial ratios for illiquid companies, which means that ATP cannot calculate all metrics for all companies, even though we have information about CO₂ emissions. LB: Location-based. MB: Market based See the accounting policies for a more detailed explanation of metrics.

REAL ESTATE INVESTMENTS

For property assessments, we set an ambition of 85 per cent by 2030. Here, too, we are well on our way with a reduction of 71 per cent compared to 2018. A large part of the reduction is due to the transition to greener energy sources, but we have also implemented a wide range of initiatives across the portfolio with a focus on energy savings and the installation of solar cells. You can read more about the work in ATP Ejendomme's ESG report.

instead looks at developments in the CO₂ emissions of the companies in which we invest.

ATP's focus is on supporting companies in reducing emissions in the real economy rather than making changes to our own portfolio that have no real-world impact.

For illiquid companies, Scope 2 emissions have increased significantly. This is because we have obtained better data on a number of companies that have high scope 2 emissions.

For illiquid companies, there is more uncertainty about the measurement than for liquid companies, as there is uncertainty about CO₂ data and financial ratios for the companies.

Carbon accounting for listed investments

2025	Total emissions		Carbon Footprint		Carbon Intensity		WACI	
	Tonnes CO ₂ e	Devel- opments from 2024	Tonnes CO ₂ e/DKKm	Devel- opments from 2024	Tonnes CO ₂ e/DKKm	Devel- opments from 2024	Tonnes CO ₂ e/ DKKm	Devel- opments from 2024
Nordic equities								
Total, MB	245,590	29.49%	7.32	5.62%	12.58	(10.77%)	6.77	(8.03%)
Total, LB	256,120	29.35%	7.64	5.50%	13.12	1211.68%	7.66	(8.68%)
Scope 1	233,052	29.22%	6.95	5.39%	11.94	(10.96%)	6.29	(4.27%)
Scope 2, MB	12,538	34.84%	0.37	9.98%	0.64	(7.08%)	0.49	(38.96%)
Scope 2, LB	23,068	30.72%	0.69	6.62%	1.18	(9.92%)	1.38	(24.55%)
International equities								
Total, MB	627,271	53.37%	9.19	4.33%	16.88	11.36%	16.50	14.06%
Total, LB	640,299	53.65%	9.38	4.51%	17.24	11.56%	17.00	14.64%
Scope 1	522,689	54.92%	7.66	5.38%	14.07	12.48%	13.60	18.60%
Scope 2, MB	104,582	46.09%	1.53	(0.63%)	2.82	6.07%	2.89	(3.35%)
Scope 2, LB	117,610	48.25%	1.72	0.84%	3.17	7.64%	3.40	1.13%
Equities overall								
Total, MB	872,861	45.81%	8.57	5.68%	15.40	4.01%	13.29	12.35%
Total, LB	896,419	45.82%	8.81	5.69%	15.82	4.02%	13.93	11.91%
Scope 1	755,741	45.97%	7.42	5.80%	13.33	4.12%	11.19	15.96%
Scope 2, MB	117,120	44.80%	1.15	4.95%	2.07	3.29%	2.10	(3.63%)
Scope 2, LB	140,678	45.06%	1.38	5.14%	2.48	3.47%	2.73	(2.10%)
Corporate bonds								
Total, MB	37,587	(13.48%)	9.15	(3.27%)	10.72	(15.62%)	13.49	(38.19%)
Total, LB	37,929	(12.46%)	9.23	(2.13%)	10.82	(14.61%)	14.88	(24.30%)
Scope 1	29,190	(16.71%)	7.10	(6.88%)	8.32	(18.76%)	9.77	(6.47%)
Scope 2, MB	8,397	(0.01%)	2.04	11.79%	2.39	(2.47%)	3.72	(67.31%)
Scope 2, LB	8,739	5.56%	2.13	18.01%	2.49	2.96%	5.11	(44.52%)

LB: Location-based MB: Market based See the accounting policies for a more detailed explanation of metrics.

Illiquid investments

Thorough preparation for long-term ownership

ATP has part of the portfolio allocated to direct investments. This means that we co-own real estate, forests, infrastructure and other assets. These are typically referred to as illiquid or unlisted investments, as we are unable to sell those assets on a stock exchange; instead, we would have to find a buyer outside the stock exchange, which entails higher transaction costs.

We also typically own a larger proportion of individual companies when making such investments, meaning that we have a greater responsibility to ensure that the companies are not involved in violations of the OECD's guidelines for multinational enterprises.

We therefore focus on discovering material ESG risks that would have an impact on our investment before we step in as co-owners. We look at both whether there are risks that are socially material or financially material. Both types of risks need to be uncovered, and in some cases action plans must be agreed on to remedy potential deficiencies when ATP steps in as an owner of an asset. The ESG due diligence work is an integrated part of our overall investment due diligence processes that are carried out via ATP's investment forum.

We have defined an ESG process for direct investments which are tailored to these kinds of assets specifically. As these are one-off investments, we can narrow down the relevant ESG areas in the specific situation in terms of geography, industry, etc. and concentrate our focus on these areas when analysing the ESG risk of the potential investment.

To assess the ESG conditions for each potential investment, we have, among other things, developed a question bank to target our research. The question bank is inspired by the American organisation SASB's materiality tool, which has identified the most financially material ESG issues in all industries. In the event that there might be a need for specialised technical expertise, we can also use external specialists to ensure that all aspects are covered.

In this way, we aim to ensure that we cover the most important aspects of all potential investments. We also assess the company's policies, processes and historical performance on ESG issues with a view to ensuring that the company meets our requirements and to identify potential opportunities for improvement.

ATP's investment in Innargi

Since 2021, ATP has been invested in the Danish company Innargi, which develops geothermal plants that utilise the earth's hot water for district heating. Innargi is a pioneering company with expertise and capacity covering the entire geothermal exploitation process, from exploration and drilling to the heating production itself. Innargi has been producing geothermal district heating in Aarhus since 2025 and is currently establishing two additional plants in the area. The project is expected to be completed in 2030 and will be the largest geothermal district heating plant of its kind in the EU.

Due to, for example, the project expansion, Innargi has carried out a capital raising round in 2025 in which ATP has participated, thereby increasing our total investment. In connection with the 2021 investment, we conducted ESG due diligence, but as Innargi was a brand new company at the time and did not yet have any plants in operation, we have conducted renewed ESG due diligence this year. Here, we have focused on the action points and unknown factors that we identified in the initial due diligence as well as on the factors that are relevant now that the company is in operation. This includes biodiversity, ensuring underground stability and the company's handling of its relationship with the local community and other affected parties.

ATP'S DUE DILIGENCE FOR DIRECT INVESTMENTS

ATP's investment forum ensures a thorough and holistic assessment of opportunities and risks. The investment forum is the framework for ATP's investment structure with 'gates' that ensure that all relevant information is gathered, analysed and assessed prior to the final investment decision. The process also helps to ensure that all our decisions are documented in ATP's systems. Each gate is a 'stop or go' decision for the investment. Here, ESG, tax practices, legal or other challenges can slow down an investment if a robust action plan cannot be formulated.

Screening phase

In the first phase, the investment team uncovers the potential investment case and makes an initial proof of concept

Gate 1 The investment team decides whether to continue working with the case

Analysis

The investment case is analysed in more detail and relevant teams are involved to schedule the due diligence process

ESG makes an initial assessment of the investment, including what information needs to be disclosed.

Gate 2 Investment Forum

Due diligence

In-depth analysis of a number of conditions, including contacts between ATP and the investment case

ESG questions from question bank, materials from data room and dialogue with the investment case

Gate 3 Investment Forum

Clarification phase

Negotiation of price and terms of the acquisition.

Potential areas where ESG matters can be improved are identified. Some matters can be included in the contractual basis.

Gate 4 Final approval in Investment Forum

ATP's Risk and Investment Committee approves the investment

Implementation

The investment is added to ATP's systems and becomes part of the ongoing asset management work.

Any ESG improvement points are followed up on and the results from ATP's ESG questionnaire are used in ongoing dialogue.

Illiquid investments

An active owner in the unlisted market

When ATP invests in real estate, an infrastructure asset or other illiquid asset, we typically do so with the aim of keeping the asset in the portfolio for a number of years and seeking to increase its value during our ownership period. Our ESG-related stewardship focuses on supporting value creation in a given company by helping to identify and manage ESG-related risks for the company or society or by utilising ESG as a lever for business development or growth in the company.

For our portfolio of illiquid investments, we have developed a stewardship wheel that is based on two pillars. The first pillar is about creating an ESG data foundation that makes it possible to follow a company's development, benchmark it against similar companies and identify areas where the company can increase its efforts. In particular, we build this data through our ESG questionnaire for illiquid investments – both direct investments and fund investments – which we launched in 2020.

The second pillar is about developing a model to monitor all ATP's investments in illiquid companies on a continuous basis, bringing together the different competences and resources of the relevant teams in the investment department to assess and manage the ESG-related risks and opportunities that continuously arise for each investment.

We have seen a positive development in the number of companies responding to ATP's questionnaire, and also in the number of metrics that individual companies are able to provide data on. The increase in the number of responses is due to both a quintupling in the number of ATP-owned companies responding to the questionnaire since 2020 and the fact that since 2022 we have invited other pension funds to also use the questionnaire for their illiquid investments.

The more companies that provide data, the better analyses we can make, and this allows companies to see if they meet the standards of similar companies and it also allows us to benchmark companies both within and across industries. In 2025, five other pension funds chose to participate, bringing the total number of responses to 607 – nine times as many as in 2020. The positive development in companies' response rates is partly due to the fact that some of the companies in ATP's

portfolio that previously lagged behind are now answering a larger proportion of the questions.

The higher number of responses and the involvement of the other pension funds has also meant that in recent years we have focused on strengthening our operational set-up to handle the questionnaire.

THE QUESTIONNAIRE SHOWS IMPROVEMENTS AT COMPANIES

Based on a company's response to the questionnaire, we formulate one or more action points that we encourage the company to focus on in the coming year. For example, a company may need to improve in terms of reporting more or in specific areas or implement a specific ESG policy or process. From the responses in 2025, we can see that companies have improved on 39 per cent of the action points we formulated in 2024 and that a further 23 per cent have been partially met. In other words, companies have improved fully or partially on over half of our action points over the course of a single year. The same was also true last year.

ESG ASSET MANAGEMENT IN DANISH EQUITIES

In our Danish equity portfolio, we gather information on an annual basis on specific themes in order to map the companies' policies, processes and performance. ATP analyses the responses and uses the results as part of our stewardship work, for example, at general meetings if a company either deserves praise or is performing poorly.

How we formulate ESG action points for companies

When selecting the action items we ask companies to work on, we look at their ESG maturity based on the questionnaire response. One group of companies needs to work on increasing their overall reporting ability and response rate. Another group provides good answers, but still needs to gain better control over key policies and processes. A third group has both reporting and policies/processes in place, but has shortcomings when it comes to reporting ESG performance figures. Finally, a fourth group can be said to have all the basics "under control", so here we go deeper analytically to identify action points that can add value to the company. For example, we review the policies that we ask companies to include in their responses and assess whether they appear up-to-date and adequate given the company's industry, geographical location and performance in the area.

In 2025, ATP had a portfolio company in group four that did not conduct employee well-being surveys particularly frequently or in a structured manner and which, at the same time, had relatively high absenteeism rates among its employees, which may be a sign of well-being challenges. At the same time, there were significant employee-related metrics that the company was unable to report on. ATP therefore encouraged the company to increase its efforts and reporting capacity in this area to ensure that employee satisfaction is satisfactory.

Investments in unlisted funds

With fund investments, ATP provides an 'indication' to the fund manager of being willing to invest a certain sum over a given period. In other words, the specific assets that co-ownership will result in by investing in the fund are not known, but only the sectors, geography and approximate size of the companies that the fund plans to invest in.

ATP's ESG due diligence for fund investments therefore focuses on the fund manager itself. Firstly, the fund must comply with ATP's fixed ESG requirements, for example, that ATP does not want to invest in the extraction of fossil fuels via illiquid funds. Secondly, we review the fund's ESG policy, which describes the fund's approach to ESG, and we send a questionnaire with ESG questions to the fund just as we do with direct investments. ATP also typically engages in dialogues with the fund to uncover the plans, processes and experiences that the fund has in relation to ESG. This also includes the context in which the fund operates, such as industries, countries and climate-related issues – all to ensure that the fund has the understanding and processes in place to manage ESG issues in their subsequent investments.

Green bonds

ATP strengthens its initiative for green bonds

As an owner of many European bonds, we want to use our influence to develop the green bond market. When we decided in 2017 to enter the market, we also developed our own approach aimed at ensuring that the green bonds we invest in comply with our investment and ESG requirements.

We have created our own standard based on ICMA's Green Bond Principles to assess green bond programmes before we invest in them. Our requirements include transparency regarding the projects financed through the bonds and the quality of reporting.

In 2023, ATP launched a new process for stewardship of green bonds for government issuers and development banks. The new process involves a detailed review of the issuers' frameworks and their allocation and impact reporting, etc. The aim is to ensure that the bond programmes still live up to ATP's own standard for green bonds and that the issuers in practice keep what they promise in their framework.

The review of issuers' reporting has shown great variation among both sovereign issuers and development banks. This applies to both the scope and depth of reporting, although the vast majority of issuers report at the project or expense level. The ability to track the projects financed by the green bonds also varies depending on whether the proceeds are managed at bond level or collectively for multiple bonds.

The vast majority of issuers have aligned their inclusion criteria with the EU taxonomy when selecting eligible projects or expenses. At ATP, we see the EU taxonomy as an important tool for investors to categorise green projects and create transparency.

Based on our review, we have been in dialogue with issuers about shortcomings and opportunities for improvement in their

bond programmes. We have encouraged issuers to report with a high level of detail to increase transparency. This includes linking the bonds directly to specific projects to better track their impact.

EUROPEAN GREEN BOND STANDARD

In October 2023, the European Parliament passed a regulation introducing a voluntary standard for green bonds in the EU. The regulation sets out uniform requirements for issuers wishing to issue bonds labelled as the 'European Green Bond Standard' (EuGB).

For issuers of bonds labelled 'EuGB', the primary requirement of the regulation is that they must use all proceeds for activities that comply with the EU taxonomy. For activities where technical screening criteria have not yet been defined but where the other requirements of the EU taxonomy are met, a flexibility pocket has been introduced that allows issuers to allocate up to 15 per cent of the proceeds to such activities.

In addition, the regulation imposes increased transparency requirements through the use of common standardised templates for reporting before and after the issuance of green bonds. It also introduces a registration system and a supervisory framework for external verifiers of European Green Bonds.

The standard came into force in 2024, so it will take some time before the market for EU green bonds is fully established.

The ATP definition of green bonds is not the same as the EU Green Bond Standard.

Stewardship of government bonds and development banks



Selection of issuers

Each year, ATP selects a number of issuers of green bonds in which ATP is invested, for review.



Review of bond programmes

Green Bond Framework, allocation and impact reporting, etc. are reviewed. For issues approved under previous ATP processes, it is checked whether the bond programme still meets ATP's stricter requirements.



Do issuers keep their promises?

Do the issuers live up to the promises in their Green Bond Framework regarding, for example, the selection of green projects and transparency?



Knowledge building and dialogue with issuers

ATP acquires knowledge about best practices and issuers' different approaches. In addition, ATP engages in dialogue with issuers regarding any questions or deficiencies.

In 2025, as part of its stewardship efforts, ATP has reached out to all issuers in our portfolio of green corporate bonds with a number of best practice recommendations. The aim is to support the development of a more transparent and comparable market for green bonds, benefiting both investors and issuers. We recognise the considerable efforts already made by issuers in their reporting, but continue to see a need for more consistent and transparent practices. Therefore, we have shared recommendations that can enhance transparency and quality in reporting:

1. Clarity regarding funded projects

Where possible, reporting at the bond level is recommended so that the proceeds from each bond can be linked to specific projects. This makes it easier for investors to follow which projects and what impact the bonds have financed. At the same time, we recognise that issuers who manage proceeds at portfolio level cannot link projects directly to each bond.

2. A combination of details and overview

The reporting should provide insight into the individual projects and an overall picture of the use and impact of the green funds. A combination of project data and aggregated information at the category level enhances both transparency and understanding.

3. Making a distinction between expected and achieved results

We recommend that issuers clearly distinguish between expected (ex-ante) and realised (ex-post) effects and create transparency regarding the methods, assumptions and reference points used.

4. Use of EU voluntary templates

The EU's voluntary templates for green reporting can be used to supplement existing reporting. They can contribute to greater standardisation and comparability across issuers.

Tax

Stewardship follows up on tax policy

During 2025, ATP engaged in dialogues with several groups about their tax policy and tax conditions in general. For ATP, it is important to send a signal to external managers and investments that their handling of tax matters is important to ATP – and we are already achieving this by contacting them with targeted questions.

Unlisted investments

Tax matters are a permanent feature in ATP's ongoing asset management process for unlisted investments. We monitor the unlisted investments closely and often have a good and constructive dialogues with both external managers and the investments directly. Some individuals contact ATP themselves to obtain ATP's assessment of, for example, their tax policy, etc.

In both 2024 and 2025, ATP experienced a more welcoming and positive response from external managers in private equity investments. ATP is seeing a big difference in the quality of the responses. In general, external managers with an internal tax function seem better equipped to respond to ATP's requests compared to those who only use external tax advisors. We find that spoken dialogue at the specialist level in particular provides a better understanding of investment structures and the specific tax issues associated with a given investment. ATP always welcomes dialogue with external managers and investments, whether written or spoken. A few years ago, the ATP changed its sampling process so that specific questions are asked about the investment based on a review of the tax analysis carried out at the time of the investment. This method is in general seen to lead to better, more detailed and also in general achieving more responses from asset managers.

ATP will continue to conduct spot checks to maintain a focus on responsible tax behaviour.

Listed investments – steadily increasing tax transparency

In connection with the spot checks in the listed portfolio, ATP's tax department reviews financial statements and any other publicly available material for the listed groups that have been selected. In 2025, ATP contacted a number of companies in ATP's portfolio that are domiciled in Bermuda for tax purposes. The companies' equities are traded on recognised stock exchanges (London and New York). Bermuda is not among the countries on the EU and OECD blacklists that ATP avoids due to their tax policies, but Bermuda is known as a low-tax country. Three out of four companies responded to our inquiry and all pointed to a number of commercial advantages to being present in Bermuda. Bermuda is introducing a 15 per cent corporation tax with effect from 2025, which groups will have to take into account in the future. At the same time, they assess that the rules on global minimum taxation are not expected to have any significant economic consequences for them.

In the Danish listed portfolio, we have conducted interviews with two groups focusing on tax considerations when integrating acquired companies. As a group, it is important to ensure that no unintended tax costs are incurred when realising the commercial synergies that form the basis for the acquisition. When acquiring large companies/activities in many countries, it is an extremely complex exercise that requires an overview and solid specialist expertise, both internally and from advisors. ATP has noted that the rules on global minimum taxation in such processes add an extra layer of complexity and place high demands on robust data capture to ensure accurate measurements and reporting, without this necessarily leading to higher tax payments.

In general, ATP experiences great willingness among the listed investments to talk openly about their tax matters.

Stewardship related to the tax area in 2025

ATP has set out its expectations for the tax behaviour of external managers and investments in ATP's tax policy. As part of its stewardship, ATP follows up on whether the investments live up to the expectations in ATP's tax policy. ATP's stewardship work regarding tax is customised to ATP's portfolios and reflects ATP's influence in the investment and access to information. During the year, ATP's tax department reviews a wide range of investments and enters into dialogue with a number of investments about their tax conditions.

Stewardship activities in 2025

	Investment type	Stewardship activities	Activity level in 2025
Unlisted investments	Direct investments and co-investments	- Ongoing dialogues, especially where ATP has a board or observer position - Tax asset management	Dialogues with approximately 12 of the 35 investments as a result of the annual review
	Fund investments on ATP's statement of financial position (Externally managed)	Tax asset management	
	Investment via ATP Private Equity Partners (fund-of-funds) or ATP Ejendomme	- Spot check investigation - General assessment of the investments in ATP Ejendomme	Number of spot checks: 3. Written dialogue with two external administrators and telephone meeting with one external administrator
investments in listed companies	Company/group is domiciled in DK	- Continuous dialogue (ongoing dialogue and voting at general meetings)	Meeting with two groups and review of/dialogue on one group's tax policy
	Company/group is domiciled outside DK	- Spot check investigation - Dialogue via the general meeting	Number of spot checks: 4 Targeted questions to four groups – responses received from three groups

Tax asset management: Asset management is the annual process in ATP where ATP follows up on the risk level in ATP's unlisted investments. The tax area is part of this process, and the investigation involves ATP's tax department revisiting the investment structure, any potential changes in the investment and in legislation and practice, etc. As part of this process, there may be dialogue directly with contact persons at the investment or external manager.

Ongoing dialogue: The ongoing dialogue in relation to unlisted equity investments is characterised by being beyond ATP's asset management process, and occurs especially with companies where ATP has a seat on the board of directors or as an observer or has significant influence due to the size of its ownership interest. The ongoing dialogue concerns the company's tax issues, e.g. tax policy, good governance in the tax area, tax considerations in connection with restructuring, changes in capital structure, etc., and is often initiated by the company/external manager.

Spot check investigations: A spot check investigation means that ATP does not review all investments in the portfolio, but selects some investments for review based on a screening of risk parameters.

- For investments via ATP Private Equity Partners, these risk parameters in 2025 include 'domicile of the fund', 'domicile of the portfolio companies' and 'ATP's/fund's ownership share', as we expect ATP's impact to increase with the size of the ownership share.

- For investments in listed companies/groups domiciled abroad, these risk parameters are as a general rule: "effective tax rate < 15 per cent" and "group turnover in countries on the EU list of non-cooperative jurisdictions". This can be, but is not always, a result of aggressive tax planning, and these investments need to be scrutinised especially closely. In 2025, the focus is on the portfolio's investments domiciled in Bermuda.

Screening

Ongoing screening of the portfolio for policy breaches

For investments in listed assets such as equities and corporate bonds, ATP typically has ownership stakes in a large number of companies. In our global portfolio, we also have a dynamic equity strategy where the portfolio changes from month to month.

We have therefore developed some ESG due diligence processes that are adapted to our investment style. We are continually screening companies in our portfolio to see if they are in violation of ATP's policy for sustainability in investments, and this allows us to spot incidents in both new and existing portfolio companies.

Screening is a good method for selecting listed companies as there is quite a bit of available data that describes how listed companies behave, e.g. from media articles, NGOs, legal documents and the companies' own reporting. This makes it possible to design systematic screening processes that are focused on sorting through the great deal of available information so that we can prioritise using our resources on investigating the most serious charges.

In this context, ATP works together with an external data supplier that monitor the behaviour of many thousands of Danish and international companies based on a long list of indicators. In addition, ATP can independently gain information from external sources, including from other trendsetting investors, about whether portfolio companies are potentially violating our Policy for Sustainability in Investments.

The topics covered in the screening work cover a broad spectrum of ESG topics from international conventions and the principles of the Global Compact. They cover environmental topics (such as biodiversity), human rights (such as the rights of indigenous peoples), labour rights (such as anti-discrimination and the right to collective bargaining) and corruption.

Screening the portfolio for such topics is a major part of ATP's integration of the OECD's Guidelines for Multinational Enterprises which specifically recommends that investors have risk-based due diligence processes to identify and prioritise cases where a portfolio company might be having a negative impact on society.

NEGATIVE SUSTAINABILITY IMPACTS

As part of the EU's Disclosure Regulation, ATP must annually publish data on 16 indicators on companies' emissions and biodiversity impacts, for instance, and explain what ATP is doing to minimise the negative sustainability impacts of our investments that the indicators show.

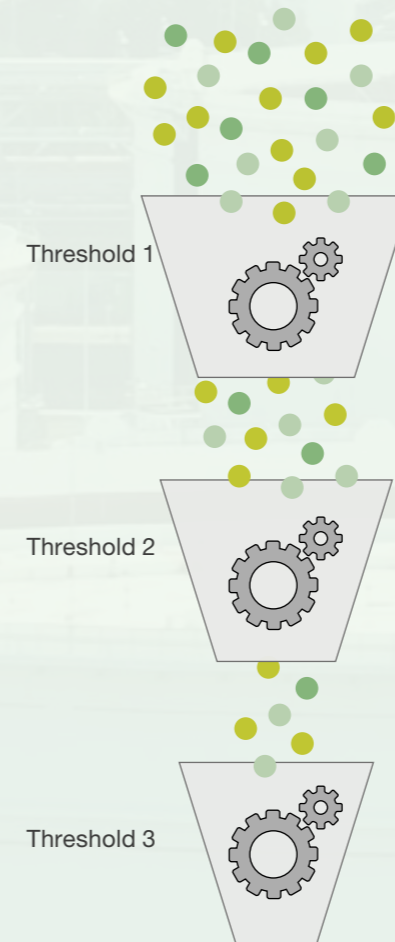
GOVERNMENT BONDS

ATP has separate processes for its investments in government bonds. ATP does not invest in government bonds from countries where the EU or UN has implemented targeted sanctions, and this is controlled on a daily basis via a control solution that is integrated into our trading system. We also use the OECD's long-term country risk classification to ensure that ATP only invests in government bonds from countries where ATP assesses that the risk is in line with the expected returns.

RISK-BASED SCREENINGS OF ATP'S EQUITIES UNIVERSE

When ATP invests in global equities, we select them from a universe consisting of many thousands of companies. Because our portfolio is dynamic, we do not only screen our current investments, we also make risk-based screenings of the surrounding universe of equities. This allows us to identify potential investments that should be investigated further before pursuing them. In a risk-based screening process, we base our approach on an issue that we want to know our potential exposure to and which, for example, is identified on the basis of previous fact-finding processes or a current media story.

THE SCREENING PROCESS



1. Screening

The first screening step identifies companies in the portfolio which may possibly be in violation of ATP's Policy for Sustainability in Investments. We have developed a system that makes it possible to automate the selection of the companies that are most likely to violate ATP's policy. These companies have recent and typically more substantiated or recurring allegations against them than other companies in the portfolio and therefore have a higher ESG risk score.

2. Prioritisation

When the scores obtained by a company do not meet our minimum requirements, it is investigated whether the complaints against the company – provided that they are deemed valid – could also constitute a violation of ATP's policy. This leads to the second step of the process. In this step, the charges are qualitatively assessed by ATP's ESG analysts. Specifically, this is done by multiple analysts independently assessing the charges against each of these companies and then this is followed by a common selection procedure.

3. Fact-finding processes

Throughout the process, we focus on the requirements of and recommendations for companies that can be derived from the Global Compact principles and the OECD Guidelines. The OECD Guidelines, for example, include recommendations for what companies should specifically do, for example, to avoid contributing to corruption. In cases where it is our assessment that the complaints are serious and could constitute a violation of ATP's policy, the company is made the subject of the third step of the investigation which is an in-depth investigation of the complaints and the company's actions – a so-called fact-finding process.

Fact-finding

How we investigate ESG charges against companies

If one of ATP's screenings indicate that a company may have violated ATP's policy for sustainability in investments, we start a fact-finding process. A fact-finding process is a flexible investigation where ATP can use various sources such as legal documents, NGO reports or corporate websites. The aim is to allow ATP's Committee for Sustainability to conclude whether ATP's policy has been violated or not.

In the fact finding process, ATP analyses the charges against the company to see if they are supported by facts. Often, there is also initiated a dialogue with the company to hear their version of events. If the study finds questionable behaviour, the company will have the opportunity to explain whether there has been launched organisational or operational initiatives to rectify matters and avoid future problems. A fact-finding process can therefore sometimes take several months.

It is the seriousness of the specific charge and not the size of our investment in the company that guides our work and conclusions. We thus act the same whether it is a small or large investment and our prioritisation is based on the societal materiality.

If a fact-finding process concludes that the company's behaviour does not violate ATP's policy, the process is concluded. However, if the fact-finding process shows that ATP's policy may have been violated, the analysts will present their results to the Committee for Sustainability and recommend that they start a targeted dialogue with the company or exclude it.

Once ATP's Committee for Sustainability has determined that a portfolio company has violated ATP's policy, we will decide whether to exclude the company or enter into a targeted dialogue with it. We will enter into a targeted dialogue with a company if there is reasonable cause to expect that ATP can influence the company to change its behaviour.

The purpose of the dialogue is to make the company correct the problem or, in the words of the OECD Guidelines, discontinue and mitigate its negative influence on society or rights

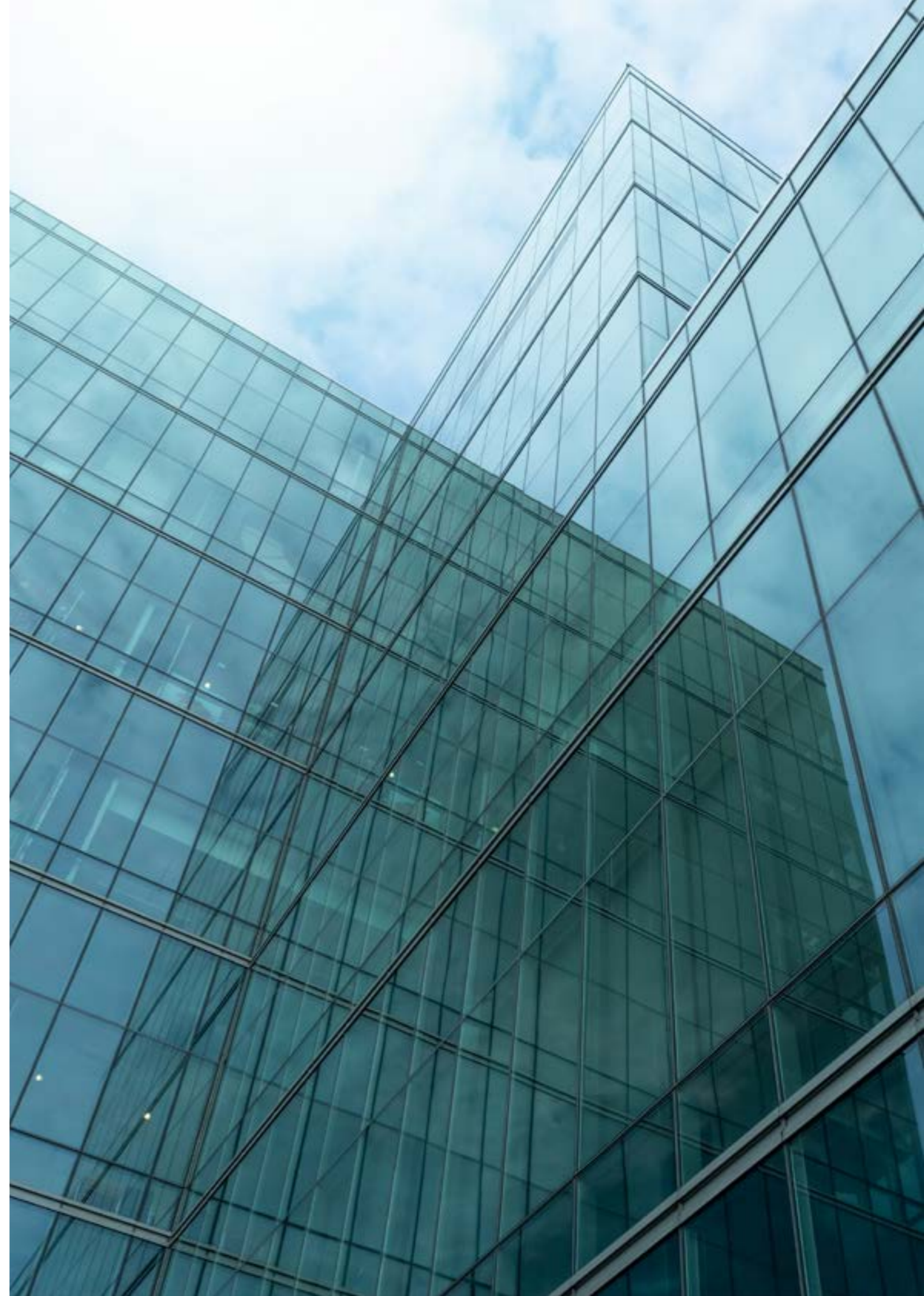
owners. This also means that we are patient in this process as long as we find that the company has a constructive attitude and is showing progress.

If the company is unwilling to change its behaviour, then in the end we will decide to exclude it. ATP's Committee for Sustainability may also choose to exclude the company without first engaging in dialogue with it. Exclusion means that ATP divests itself of its investments in the company and that the company is removed from ATP's investment universe for an indeterminate period of time.

The exclusion applies to the equity investments in the company itself and all majority-owned subsidiaries and loans to the company and its subsidiaries. The current list of excluded companies can be found at atp.dk.

WHEN ADDITIONAL INVESTIGATIONS ARE UNNECESSARY

ATP prioritises the deployment of its resources on investigating companies that we are either invested in or considering investing in – in other words, where there is a real risk that ATP would be associated with a company's problematic behaviour. Companies outside of our equities universe and which we do not consider investing in are generally not something that we independently choose to investigate. However, there are certain types of companies that ATP wants to be absolutely sure we are not associated with and where additional investigations are also not needed. Specifically, these kinds of companies are those that produce cluster bombs, landmines or nuclear weapons contrary to the non-proliferation treaty or companies that are subject to international sanctions and which ATP cannot invest in. ATP uses research from specialised external data suppliers with particular insights into either the production of weapons or sanctions.



Follow-up on ATP's own ratios

Resource consumption, social matters and governance in ATP as a company

To promote a sustainable and responsible society, ATP focuses on delivering real sustainable development in the wide range of roles that ATP operates in. As a large workplace with 2,759 full-time employees (average) in 2025 at a number of locations across the country, the ATP Group makes an impact on the society around it, including in relation to the environment, the climate and through its relationship with its employees. We are conscious of this responsibility and therefore work continuously to encourage development in a more sustainable direction, economically, socially and environmentally.

RATIOS FOR ENVIRONMENT IMPACTS

Responsible operations

In the table on the next page, ATP accounts for its environmental impacts, for instance through CO₂ emissions, electricity, heat and water consumption in ATP's Danish offices in Aarhus, Haderslev, Holstebro, Vordingborg, Frederikshavn, Hillerød, Allerød and Copenhagen.

In 2025, total CO₂ emissions will have fallen by 233 tonnes compared to the 2024 level. The lower emissions are mainly in scope 3 and can be related to lower activity within business travel. In addition, emissions from scope 1 and 2 have been reduced to a lesser extent, which can be attributed to lower energy consumption at the Group's offices. In 2025, solar cells covered approximately 15 per cent of our total electricity consumption, which is on par with 2024.

Energy consumption and floor space are measured for 2025, including the office location in Allerød, which will be vacated during 2025 with a view to bringing employees together at ATP's refurbished head office in Hillerød. The location will be completely vacated by the transition to 2026, which means that ATP will have a reduced total area from 2026 onwards.

Reducing our own carbon footprint

Since 2018, the ATP Group has worked purposefully to reduce greenhouse gas emissions from our operations. At ATP, we have an ambition to reduce the carbon footprint of our office locations and travel by 30 per cent by 2025 and 70 per cent by 2030. The goal is to achieve carbon neutrality by 2050

(baseline 2018). By 2025, the calculated carbon footprint was reduced by 63 per cent compared to 2018. This reduction is partly due to energy optimisation of our buildings and technical installations, installation of solar panels and a reduction in air travel. A significant part of the reduction can also be attributed to decreasing emission factors over the years, reflecting an increased share of renewable energy in Denmark's overall energy supply.

ATP's work with scope 3 emissions

ATP is working on a scope 3 analysis with a view to targeting reporting towards the most relevant parts of the value chain. The analysis covers data quality, choice of methods and relevance in relation to ATP's climate efforts. As the work is not yet complete, we are limiting our 2025 reporting to Scope 1 and 2 as well as those parts of Scope 3 where the data basis is most robust. Once the analysis is complete, we will consider any needed adjustments to the reporting.

SOCIAL RATIOS

Employee engagement surveys

This year, ATP conducted an extended employee survey, which also included the statutory workplace assessment of both the physical and psychological working environment. The survey had a response rate of 92 per cent and an overall engagement score of 83 – a stable result in a year of many changes. A record number of voluntary comments (2,832) were submitted, demonstrating a high level of engagement and a desire to express opinions. The comments support the perception of a healthy corporate culture, with particular emphasis on a good working environment, high professional standards and a good working atmosphere.

Employees express high satisfaction with management, influence, inclusion and flexibility. At the same time, many indicate that they would recommend ATP as a workplace to others (eNPS) – a strong signal of involvement and trust in the organisation.

Staff turnover

Staff turnover in 2025 was 11.4 per cent, compared with 13.7 per cent the previous year. Both voluntary turnover (6.4 per

Environmental impact of CO₂, consumption of electricity, heat and water, etc.²

	2025	2024	2023
ATP facts			
Number of locations	10	10	10
Number of sq. m.	66,356	65,196	63,949
Number of employees (FTE) ¹	2759	2810	2,869
Consumption data			
Electricity consumption (MWh)	3,173	3,414	3,144
Of which self-produced electricity (MWh)	480	501	242
Heat consumption (MWh)	4,133	4,295	4,114
Water consumption (m3)	14,550	15,566	15,666
KPIs			
Area per employee	24	23	22
Power consumption per employee (kWh)	1,152	1,216	1,096
Heating consumption per sq. m. (KWh)	62	66	64
The company's own emissions (CO₂e, tonnes)			
CO ₂ e – Scope 1	68	85	59
CO ₂ e – Scope 2 (location-based)	305	320	384
CO ₂ e – Scope 3 (business travel, energy, water)	574	775	672
Total CO₂e emissions (2018 baseline: 2,585 tonnes)	947	1,180	1,116
Percentage reduction compared to 2018 baseline	63%	54%	57%

¹Number of employees is calculated as average FTE (full-time equivalents)

²The calculated emissions and reductions for the comparison years 2023 and 2024 have been recalculated using current emission factors in accordance with the principles described in the methodology section. For a general description of accounting principles, please refer to the methodology section.

cent) and involuntary turnover (3.7 per cent) are declining, while retirements remain stable at around 1.3 per cent. It is expected that staff turnover will vary from year to year, partly as a result of general developments in the labour market. ATP strives to ensure a healthy balance between retention and renewal.

Sickness absence

Sickness absence among ATP employees has fallen for the fourth consecutive year and is now at a historic low of 7.2 sick days per full-time employee on average – a decline of 10 per cent compared with the previous year. The reduction is very satisfactory and meets our target of a maximum of 7.5 sick days per year. This is an important step in our work to promote a healthy and sustainable working environment.

This development reflects, among other things, our prioritisation of prevention and well-being. We offer a wide range of health promotion initiatives, including fitness facilities, physiotherapy, health weeks, flu vaccinations, health insurance and access to healthcare advice. In addition, we systematically follow up on absences and conduct health interviews to provide the best possible support to employees and ensure early intervention.

ATP continues its efforts to improve well-being and maintain sickness absence at a low and realistic level. The goal is for ATP employees to continue to have lower absence rates than comparable organisations.



Inclusion measurement improves a data-based approach to diversity and inclusion

In 2025, ATP conducted its first inclusion measurement among all employees. The results provide new, systematic insight into employees' experiences of belonging, psychological safety and equal opportunities. The survey will be a key tool in developing a more data-driven approach to diversity and inclusion and will provide a stronger basis for prioritising initiatives that can strengthen the sense of community and inclusion across ATP.



'Different brains at work' – increased focus on neuro-divergent profiles

In 2025, ATP launched the initiative 'Different brains at work', which aims to make the workplace more accessible to employees with neuro-divergent profiles. The initiative includes knowledge building, leadership training, targeted employee programmes, and a network for neuro-divergent employees. The objective is to create greater understanding of the differences that exist among employees – and thereby improve both inclusion and task performance.



The Sunflower line – extra support for customers with special needs

In 2025, Udbetaling Danmark established the Sunflower line (the sunflower is an internationally recognised symbol for people with hidden disabilities) as a service for customers who need extra patience, time or attention when contacting Udbetaling Danmark Pension about state pensions or early retirement pensions. Customer advisors on the line have received special training in creating a safe and more equal dialogue, which supports ATP's customer promise to make it easy to be a customer and ensure that all citizens feel they are treated with understanding and respect.



Renovation and improved facilities

In 2025, ATP completed the modernisation of its physical premises in Hillerød. The renovation includes improved workspaces, more flexible meeting facilities and adjustments to the canteen and common areas. The aim is to create a more functional and accessible working environment with space for colleagues from the closed location in Allerød while the renovation also provides an opportunity to upgrade the building's technical installations and support lower resource consumption.

Accidents at work

In 2025, 30 workplace accidents were recorded, compared to 27 in 2024 and 18 in 2023. The increase is primarily due to more falls, especially at the addresses in Hillerød and the now closed location in Allerød. 20 of the 30 workplace accidents in 2025 were falls, and most of them were related to stairs or slippery surfaces.

There is no clear picture of the reason for the increase. In Hillerød, a campaign on safe stair use has been carried out and at the beginning of 2026 this was followed up with an initiative focusing on slippery surfaces during the winter period.

Despite the increase since 2023, ATP continues to have few serious occupational accidents. ATP maintains an ongoing focus on the working environment and prevention and closely monitors developments in this area.

Gender balance in management

ATP makes every effort to ensure a balanced distribution between men and women in the Group's "other management tiers" (to be understood here as the two top management tiers under the Supervisory Board) which in practice means a 60/40

distribution. All of ATP's business areas with gender imbalances are working on ensuring a more equal gender distribution in the context of the business area they operate in.

The target was achieved for 2025, as 43 per cent of managers in the top management tiers were women and 57 per cent were men.

There is a variation in the gender composition of management roles depending on the management tier and business area. In 2025, there was an overrepresentation of women in general when looking at all employees in the Group.

Part of ATP's strategy is to increase the focus and emphasis on diversity in connection with the recruitment of new employees, and a targeted effort is made to recruit a wide range of candidates for the management and development of in-house talent in ATP's talent programme.

Pay difference between genders

ATP is an organisation with a wide variety of tasks and job types, which requires diverse skills and specialists in many different areas. Three job functions – customer advisors (approximately 850 employees), workers' compensation

Follow-up on social ratios

	2025	2024	2023	
Number of employees (FTE)	2,759	2,810	2,869	
Gender distribution among all employees ¹	Women	64%	64%	64%
	Men	36%	36%	36%
Gender distribution among other management tiers (Executive Vice President and CEO) ¹	Women	43%	42%	47%
	Men	57%	58%	53%
Gender distribution among all management, including CEOs ¹	Women	51 per cent	51 per cent	53%
	Men	49%	49%	47%
Staff turnover ²	11%	14%	16%	
Sickness absence rate (average number of days per FTE)	7.2	8.0	8.7	
Number of accidents at work	30	27	18	
Pay difference between genders				
All employees ³ (unadjusted salary difference)	1.4	1.4	1.5	
Customer advisors, occupational injury case handlers and head of section employees in Customer Service	1.0	1.0	1.0	

¹ The ratio for gender distribution is calculated based on average FTE

² Staff turnover is calculated on the basis of all permanent employees.

³ The calculation does not include apprentices, people employed under the flexjob scheme, temporary employments, members of the executive management, CEOs of the subsidiaries and civil servants.

claims handlers (approximately 240 employees) and Heads of Section in Customer Service (approximately 60 employees) – together accounted for approximately 43 per cent of all employees in the Group in 2025. These job functions are considered to be large and homogenous enough to make a comparison of salary levels in relation to gender. The pay gap within these job functions in ATP has a ratio of around 1.0, which means that men and women are at the same pay level.

For the ATP Group as a whole, the ratio is 1.4, meaning that men earn 0.4 times more than women. It is important to note that this is the unadjusted pay gap, where the majority of the total gender pay gap can be explained by differences in job functions. Women are overrepresented in jobs such as customer advisors and case handlers, while men are overrepresented in jobs in investment and IT where the average salary is higher. There is nothing to suggest that the current pay struc-

ture does not ensure equal pay for equal work or work of equal value. ATP is working on a new job architecture to ensure pay transparency and the identification of any potential pay differences between genders.

GOVERNANCE RATIOS

Pay difference CEO and employees

The purpose of the CEO-Worker pay ratio is to show the pay ratio between CEO and employees and to show the development in pay for the CEO compared to the employees.

In ATP, the ratio is a factor 11 for 2025, meaning that the CEO's pay corresponds to 11 times the average pay of all employees in ATP. This includes employees carrying out administrative tasks for external parties. The ratios are similar to last year

When considering ATP Livslang Pension (Lifelong Pension) and the associated employees in isolation, and in order for the ratios to be comparable to other pension funds, the ratio is a factor 8, meaning that the CEO's pay corresponds to 8 times the average pay of employees. The ratios are similar to last year

ATP's report on the status of compliance with the target figures set for the underrepresented gender

The composition of the Supervisory Board is specified in the ATP Act, where it is also stated that the Board of Representatives and the Supervisory Board should as far as possible have a balanced gender distribution between men and women. The Supervisory Board explains its composition, its competencies, including the individual members' special competencies and other directorships in the supplementary information to the Annual Report 'Other directorships held by members of the Supervisory Board'. The Supervisory Board discusses its overall competencies in connection with the annual self-assessment. The Supervisory Board has a number of members with expertise and operational experience from financial companies as well as accounting, investment and pension issues.

In terms of the gender composition of ATP's Board of Representatives and Supervisory Board, there is a requirement for a balanced composition which in practice means a requirement of having at least one third of members being from the under-represented gender. The target for the Board of

Follow-up on governance ratios

	2025	2024	2023	
Gender distribution on the Supervisory Board	Women	31%	31%	38%
	Men	69%	69%	62%
Gender distribution on the Board of Representatives	Women	35%	39%	39%
	Men	65%	61%	61%
Attendance at Supervisory Board meetings	93%	87%	96%	
Pay difference between CEO and all employees	11	11	11	
Pay difference between CEO and employees, isolated for ATP Livslang Pension (Lifelong Pension)	8	8	8	

Representatives was met as 11 women served on the Board of Representatives in (35 per cent) and 20 men served. The Supervisory Board has not achieved its target, as following the most recent appointments in December 2025, it consists of four women (31 per cent) and nine men. ATP's Supervisory Board has therefore set a target of at least 5 members of the underrepresented gender (corresponding to 38 per cent) by the end of 2028.

It is the individual organisations that recommend members to ATP's Board of Representatives and the Supervisory Board and the Danish Minister for Employment appoints the members. The appointment period for the Board of Representatives and the Supervisory Board is three years, meaning that one third of the members are appointed each year. The nominating organisations will take the unbalanced composition of men and women in ATP's Supervisory Board into account in future nominations.

ATP's other management levels are subject to a gender balance target of to 40/60 per cent. This target has been met. Some of ATP's subsidiaries are also covered by legislation on

gender balance in the supreme governing body and at other management levels. By law, this requires a 40/60 per cent split, which requires the presence of a minimum of 3 people. At ATP Ejendomme A/S, there is an equal gender balance in the top management tier. There is no equal gender distribution at the other management tiers, which is why ATP Ejendomme A/S has set targets for the proportion of the underrepresented gender at the other management tiers and drawn up a policy to increase the proportion of the underrepresented gender. The policy focuses on promoting gender equality at other management tiers and includes specific initiatives and measures, such as ensuring that hiring procedures and recruitment are gender neutral, attracting leadership talent from the underrepresented gender and strengthening ATP Ejendomme's internal pipeline with a focus on career development for the underrepresented gender. Similarly, ATP Ejendomme works through cooperation agreements with educational institutions to increase awareness and understanding of the property sector among students, thereby presenting itself as an attractive employer regardless of gender. As the policy and the measures implemented are still in their early stages, it is too early to see the results of the efforts to increase the proportion of the under-represented gender at management levels. The policy is reviewed and updated annually to ensure that it continues to support the goal of a more equal gender distribution at other management tiers.

In the other covered subsidiaries, including the Private Equity partners group there is an equal gender composition at the obligated management levels, and these companies are therefore not required to set targets or develop a policy to increase the proportion of the underrepresented gender.

ATP'S POLICY FOR DIVERSITY AND INCLUSION

ATP wants to be a competitive and attractive place to work that is capable of drawing in, 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 sees, accommodates the potential of diversity.

The policy supports ATP's strategic goal of contributing to the development of a sustainable society by continuously working for equal opportunities and inclusion (DE&I) at ATP as a workplace.

The policy and the associated activities also have a focus on improving the opportunities for the under-represented gender as every effort is made to ensure equal representation among genders at the other management tiers.

The Policy for Diversity and Inclusion, as well as targets and status for gender in management are approved annually by ATP's Supervisory Board. This policy replaces a diversity policy, which is formally required in ATP's Executive Order on Accounting.

The policy can also be found at atp.dk

TARGET FIGURES FOR THE UNDERREPRESENTED GENDER

ATP's executive order on accounting stipulates that ATP is to account for the status of compliance with the target figures set for the underrepresented gender on the Supervisory Board, including why ATP has not achieved the target set, if this is the case.

Methodology and notes

ATP'S POINT SYSTEM FOR COMPANIES' CO₂ REPORTING

ATP has created a model where we rank all companies based on their current level. Every scope gets between 0-3 points, and the points are then added together to find the overall level of reporting. Nine points can be achieved if a company reports sufficiently on scope 1, 2 and 3 emissions.

The goal here is for companies to work on improving their reporting based on their current status, but there is also an expectation that everyone keeps improving. This ambition only applies to funds where the investment has been made. The ambition was published in October 2021.

	Assessment of scope 1	Assessment of scope 2	Assessment of scope 3
0 points	No reporting	No reporting	No reporting
1 point	Only reports on a single figure for Scope 1+2	Only reports on a single figure for Scope 1+2 Does not specify whether scope 2 reporting is market-based or location-based	Only reports on a single figure for scope 3 (without specifying the distribution between the various subcategories)
2 points	Does not report on a company-wide basis	Does not report on a company-wide basis Only reports on one of the figures: Market-based or location-based	Reports on some, but not all, relevant scope 3 categories
3 points	Reports on a single company-wide scope 1 figure	Reports on company-wide, market-based and location-based figures	Reports on all relevant scope 3 categories and, if not needed, states which subcategories are not applicable

HOW ATP MEASURES ITS GREEN INVESTMENTS

The EU's work on creating a green taxonomy is still ongoing, but ATP has still chosen to use the preliminary taxonomy as inspiration in order to ensure that our green investments can be measured in a way that adds as much credibility to our ambitions as possible.

Green bonds: Calculated as the green bonds that fulfil ICMA's Green Bond Principles.

Real estate: Measured as the real estate that is certified based on the internationally recognised standards: DNGB, LEED and BREEAM.

Listed equities: Measured based on reported data on company taxonomy alignment from a recognised data provider (Bloomberg).

Direct investments and funds: ATP's Chief Investment Officer designates green assets that would presumably be covered by the EU's taxonomy for sustainable investments. ATP only includes these investments if their likely degree of compatibility with the EU's taxonomy for sustainable activities is verified by an external consultant.

The ambitions are subject to a number of preconditions, including political and economic developments, and these are available on ATP's website. ATP publishes a combined figure for the green investments and separate figures for the individual categories. Due to market considerations, we do not publish details about companies.

The work on fulfilling the climate ambitions takes place within the framework of the prudent person principle and the requirement that ATP must invest its assets in a way that best serves the interests of its members.

CONDITIONS FOR CLIMATE PLEDGES

ATP's climate ambitions are specified under the same overall framework as the commitments the insurance and pension sector are made under.

The insurance and pension sector terms are as follows:

"The commitments made in the Danish insurance and pension sector are conditional and based on an expectation of the market situation towards 2030. The commitments are conditional on the following:

- Market conditions (that there are enough green investments available and that they provide a reasonable return)
- Company-specific circumstances (that pension contributions continue to develop as expected and that the guaranteed pension products do not force companies to change their investment allocation)
- Political circumstances (that framework conditions and regulation support the green transition and make green investments relatively attractive and ideally less risky)

If one or more of these conditions deviate significantly from what is expected, it can have an impact on investments in green assets. This is in line with the primary purpose and duty of pension companies, which is to promote the financial security of Danes in retirement."

Additional conditions related specifically to ATP:

The proposed climate ambitions do not change the business model of ATP Livslang Pension (Lifelong Pension) or the fundamental strategy for the hedging and investment portfolio.

The work on fulfilling the climate ambitions takes place within the framework of the prudent person principle and the requirement that ATP must invest its assets in a way that best serves the interests of its members.

Changes in, for example, market conditions, including interest rate fluctuations, may give rise to a reassessment of ATP's climate ambitions

The ambition for green investments is subject to uncertainty, partly because the size of ATP's statement of financial position is sensitive to changes in interest rates.

Continued on next page

CO₂ METRICS

CO₂ figures are calculated based on the following formulas:

Total carbon emissions

$$\sum_i^n \left(\frac{\text{Value of Investment}_i}{\text{Issuer's EVIC}_i} \times \text{Issuer's Scope 1 and Scope 2 GHG emissions}_i \right)$$

Total carbon emissions are the emissions that correspond to ATP's ownership stake

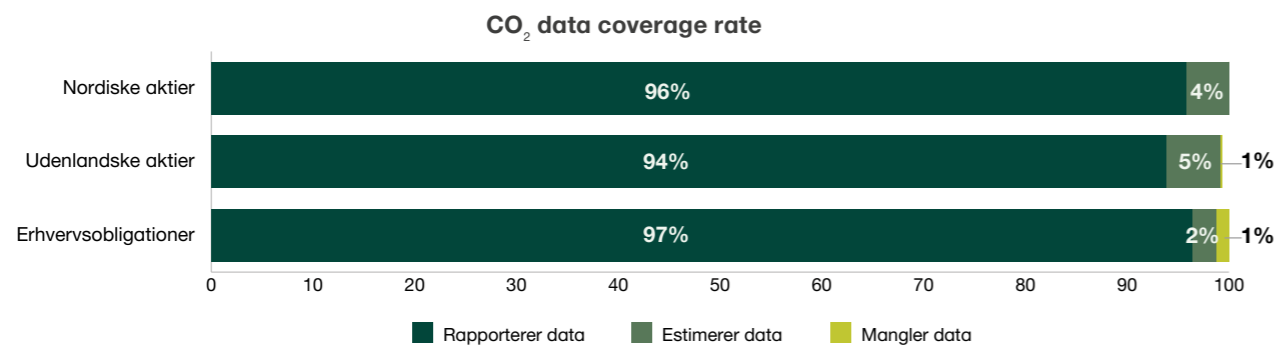
Carbon Footprint

$$\frac{\sum_i^n \left(\frac{\text{Value of Investment}_i}{\text{Issuer's EVIC}_i} \times \text{Issuer's Scope 1 and Scope 2 GHG emissions}_i \right)}{\text{Total Portfolio Value}}$$

The carbon footprint statement is normalised based on the total size of the portfolio.

DATA BASIS FOR CO₂ REPORTING

ATP includes estimated data from third parties in its measurement. The degree of coverage for different asset classes can be seen below. Covers scope 1 and scope 2.



LOCATION-BASED AND MARKET-BASED REPORTING.

In the measurements for market-based scope 2 emissions, ATP has used market-based reporting from the companies that measure both market-based and location-based CO₂ data. For companies that only report using one method, there has been used the reported data regardless of whether it was from one method or the other. For location-based reporting the method is the same, just with a preference for location-based data in the companies that report on both figures.

Location-based reporting covers the actual emissions from electricity consumption, etc. on the electric grid the company is using. Market-based reporting calculates emissions based on contracts for green certificates, etc.

Data for unlisted investments is obtained from ATP's questionnaire. The CO₂ metrics are the same as those used on page 14. This year, there are additional companies who have reported on CO₂ compared to last year – for this reason, it is hard to make a meaningful comparison between last year's figures.

GUIDELINES

The majority of the portfolio reports ESG data with a one-year lag, although certain companies operate with a longer time horizon in their reporting. ATP's sustainability strategy is based on data from the three most recent reporting periods. A screening conducted in 2025 will thus primarily be based on company data from the period 2024-2022, although the screening for individual companies will be based on data from 2023-2021.

ATP has established a total of seven guidelines in the areas of diversity, absolute CO₂ emissions and occupational accidents. With regard to absolute CO₂ emissions and occupational accidents, the guidelines are based on the companies working towards achieving zero emissions and zero occupational accidents in the long term. For diversity, the goal is for companies to work towards a 40:60 distribution of the underrepresented gender. A positive development is thus defined as a reduction in emissions and occupational accidents, while for diversity it translates into an improved gender balance – typically, but not always, through an increase in the proportion of women.

ATP conducts an annual screening of the portfolio as it is on 30 June. For each individual guideline, an assessment is made as to whether the company has shown positive development over either a one-year or two-year period. If the company can demonstrate positive developments within one of these periods, ATP considers the guideline in question to have been met for the portfolio company in question.

The criteria for meeting ATP's guidelines mean that portfolio companies do not necessarily show a positive trend over both a one-year and two-year period. In connection with a specific screening, companies may thus show positive developments over the past year without this necessarily being the case over a two-year period – or vice versa – and still comply with ATP's guidelines. When ATP refers to companies that fulfil one of the established guidelines, it cannot necessarily be concluded that these companies have shown positive development over both a one-year and two-year period. However, these companies will, at a minimum, have shown positive developments over either a one-year or two-year period.

However, the structure of ATP's guideline logic ensures that continued compliance over repeated screening periods is not possible if a company exhibits a negative trend over a longer time horizon.

CLIMATE DATA AND ENERGY CONSUMPTION

Climate ambitions

For ATP, the ambition is formulated as an absolute CO₂ reduction of 30 per cent in 2025, 70 per cent in 2030 and being carbon neutral in 2050 with 2018 as the baseline year. The activities where there is complete and credible data going back to 2018 are included. This applies to scope 1 and scope 2 emissions (location-based) and scope 3 activities: water consumption (GHG category 1), energy-related emissions (GHG category 3) and business travel (GHG category 6).

Measurement of CO₂ emissions

The measured greenhouse gas emissions are measured in CO₂ equivalents and divided into scopes as per the GHG protocol. To calculate ATP's own CO₂ emissions, we use emission factors from the Danish Business Authority's tool (klimakompasset.dk) which is adapted to the GHG standard. The emission factors are based on Danish and international climate statistics from Energinet, ens.dk, DEFRA, etc. The emission factors are published with a time lag in relation to ATP's annual reporting, which is why CO₂ calculations for the current financial year are based on previous years' emission factors. Historical figures are recalculated in subsequent years' reports when the relevant emission factors become available and therefore comparative figures may change in relation to the years in which they were published. For some scope 3 activities there is used CO₂ calculations provided directly by ATP's suppliers.

Scope 1

Scope 1 emissions are defined as direct emissions from sources that are owned or controlled by PFA. At ATP, the category exclusively covers the consumption of natural gas at our Allerød location. The calculation is based on measured consumption and emission factors from klimakompasset.dk.

Scope 2

Scope 2 emissions are defined as indirect emissions from the production of electricity and district heating consumed at ATP's locations. Scope 2 emissions are measured on a location basis, which means that for electricity, an emission factor is used that reflects the CO₂ impact of the actual electricity supplied to the electricity grid. The emission factor is based on Energinet's environmental declaration as calculated in Klimakompasset. Electricity consumption is divided into purchased electricity and self-produced electricity and the CO₂ impact is only calculated for purchased electricity. For district heating, there is used measured consumption and emission factors from klimakompasset.dk.

Scope 3

Scope 3 emissions are defined as indirect emissions from sources in ATP's value chain. A general challenge with scope 3 emissions is limitations in data availability and the measurements may therefore be incomplete and include varying levels of assumptions and estimates. In the current year, scope 3 categories are limited to activities for which reliable and complete historical data is available as described above. Below there is an account of the method used for each activity:

Category 1 – purchased products and services:

Water consumption: The calculation is based on measured consumption and emission factors from klimakompasset.dk.

Category 3 – energy-related emissions

The category covers the upstream emissions related to the production of consumed electricity, district heating and natural gas which are not included in scope 1 and 2. The calculation is based on measured energy consumption and emission factors from klimakompasset.dk.

Category 6 – business travel:

Covers air travel and travel between locations in employees' own cars. For air travel, there is used a direct CO₂ calculation provided by ATP's travel agency based on emission factors from DEFRA. The emissions from driving in own cars are based on actual registrations of driving allowances from ATP's finance system and emission from klimakompasset.dk.

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SOCIAL RATIOS

Number of FTEs

Measured as average FTE

Gender distribution

The ratio for gender distribution is calculated based on average FTE

Staff turnover

The ratio is calculated on the basis of all permanent employees on standard terms. The calculation is based on the number of headcounts.

Sickness absence

Calculated as the average number of days per FTE.

Accidents at work

Number of accidents at work during the year

Pay difference between genders

Ratios are calculated based on median salary. The calculation does not include variable supplementary pay, trainees, people employed under the flexjob scheme, temporary employments, members of the executive management, CEOs of the subsidiaries and civil servants.

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GOVERNANCE RATIOS

Gender distribution on the Supervisory Board and the Board of Representatives

Measured on the balance sheet date of 31 December 2025

Attendance at Supervisory Board meetings

Calculated as number of meetings attended / number of meetings

Pay difference between CEO and employees

Calculated as the difference between the CEO's pay and the average employee's pay.