

Responsible for the area: Bård Grande Replaces the policy of: 27 August 2019 The policy applies from: 31 August 2020

The ATP Group's diversity policy

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Torben M. Andersen Chairman of the Supervisory Board

1. Purpose, scope of application and strategic targets

ATP wants to be a company that is capable of attracting, developing and maintaining a diverse group of employees in order to achieve good results and to ensure a diverse and open organisation where there is room for everyone - also those who need special considerations.

This policy covers the ATP Group.

The policy supports strategic targets concerning ATP being a responsible and effective company which is sufficiently equipped in terms of resources and competences to carry out ATP's activities and at the same time address ATP's social responsibility for Danish society and ATP's most significant stakeholders.

ATP has signed the UN Global Compact which, among other things, commits ATP to not discriminate on work-related and employment issues.

2. Identification of risks

There are three risks/consequences related to diversity:

- Financial and reputational consequences from not complying with legislation or prevailing norms
- Negative result-related consequences from failing to attract and maintain competent employees
- Societal consequences from not meeting the expectations concerning social responsibility coming from society and clients.

3. Diversity policy

Innovative working environment

At ATP, we believe that the working environment is strengthened through diversity. We believe that diversity provides for a more dynamic, vibrant and inspirational working environment – for the benefit of both employees and customers. In other words, diversity among managers and employees is the basis for continuous innovation and competitiveness. Diversity expands our recruitment potential and ensures a wide range of skills in managers and employees.

A culture of diversity

Diversity should be a natural and embedded part of everyday work and be reflected in our culture. We want our workplace to support an inclusive environment for all employees, regardless of age, gender, ethnicity, sexual orientation or disability. We expect both managers and employees to help to ensure that diversity flourishes and thrives in our workplace.

At ATP, diversity is about valuing employees because of, rather than in spite of, their differences. It is about seeing the potential of each employee and creating equal opportunities.

One important way to increase diversity is by sharpening our recruitment focus, focusing on the skills, development potential and contribution to diversity of each individual – for the benefit of the bottom line. When recruiting, we assess the candidate's professional skills, but we also emphasise that the candidate must be able to identify with ATP's values and possesses the right social and personal skills.

We want diversity to be reflected at all levels of the organisation. To that end, we need to ensure a diverse talent pool at both the employee and management levels.

Openness

Diversity also makes demands on the organisation – in terms of openness, curiosity and having the courage and the will to embrace diversity. Success in creating a diverse workplace is a shared responsibility. Therefore, both managers and employees are expected to commit to contributing to the diversity of ATP.

No one should feel discriminated against because of their gender, age, ethnicity, sexual orientation or disability, either in their everyday working lives or in the recruitment process.

If, for a period of time or indefinitely, employees are unable to perform their job for health, social or personal reasons, ATP will seek, as far as possible, to ensure a continued affiliation with ATP by balancing the job and the employee's working capacity. In such cases, employees are expected to collaborate with ATP and contribute actively to preserving the affiliation.

Diversity is about creating room for everyone to grow and deliver unique business results. Diversity is also about including groups in need of special focus to grow and maximise their potential. In that sense, diversity is also about ATP's obligation to take on social responsibility.

4. Recommendations for achieving targets

The policy is created by the Executive Board, which defines specific targets and scheduled and current activities that derive from these targets.

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 an absolutely requirement of having at least one third of members being from the under-represented gender. Achieving this target is the responsibility of the relevant organisations and the Danish Minister for Employment.

In terms of the gender composition on other management layers in the entire ATP Group, the objective is to have an equal distribution, which in practice means at least a 60/40 split.

5. Reporting

Two annual reports are submitted to ATP's Supervisory Board in August:

- Status of targets and the diversity policy of ATP
- Status for special social tasks at ATP

There is submitted an annual report to the Danish Minister for Employment, cf. the Danish Act on Gender Equality's Section 11(5).

ATP's annual report must also make an account of the status, policy, etc. - see Section 23 of ATP's Executive Order on Accounting.

6. Exemption possibilities

None

7. Updating

This policy must be presented to the Supervisory Board at least once a year for the purpose of an assessment of whether it is still prudent, including with reporting on the compliance. In case of material changes to the assumptions that form the basis of the policy, it must be adapted.