

Statutory Statement on Data Ethics, cf. Section 99d of the Danish Financial Statements Act

This statutory statement on data ethics of Brødrene A & O Johansen A/S is part of the Management's review in the Annual Report for 2021 and covers the accounting period from 1 January to 31 December 2021.

Brødrene A & O Johansen A/S is the only Danish company in the group covered by the rules. This statement therefore only concerns Brødrene A & O Johansen A/S (hereinafter 'AO').

AO had no separate policy for data ethics by the end of 2021. In continuation of the development in responsible data use in society, including information security, personal data processing and data ethics, and in continuation of the clarification of the concept of data ethics, which i.a. has appeared from the work of the Danish Data Ethics Council and the Danish Council for Digital Security and others, the Company's IT Security Council decided at the end of 2021 to supplement its efforts related to information security and protection of personal data by placing special focus on data ethics in future.

Subsequently, the IT Security Council has set up a data ethics working group, which has been tasked with making recommendations to the IT Security Council regarding a data ethics policy, data ethics principles and data ethics controls in connection with the said policy.

Once the data ethics policy and the data ethics principles have been approved, the working group is to make recommendations to the IT Security Council regarding data ethics considerations, including in relation to any specific data ethics dilemmas, to be used by the IT Security Council when considering and making decisions.

A policy for data ethics and data ethics principles will be approved before the end of April 2022. Subsequently, data ethics controls will be defined and performed no later than by the end of the 4th quarter of 2022.

The IT Security Council will be informed annually about the status of the data ethics controls, just as the data ethics policy will be discussed and approved annually both by the IT Security Council and by the Company's Board of Directors.

The data ethics working group had its first meeting on 5th January 2022.