
STATUTORY STATEMENT
on Data Ethics, cf. Section 99d of the
Danish Financial Statements Act



BRØDRENE A & O JOHANSEN A/S

Rørvang 3
DK-2620 Albertslund
Denmark

CVR (Central Business Register) No.: 58210617

As adopted by the Board of Directors on 8th December 2022

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 2022 and covers the accounting period from 1 January to 31 December 2022.

Brødrene A & O Johansen A/S is the only Danish company in the group covered by the rules. Therefore, this statement only applies to Brødrene A & O Johansen A/S (hereinafter referred to as 'AO').

To a large extent, Brødrene A & O Johansen A/S uses data to optimise business processes and to develop its business. For this reason, a data ethics policy was adopted by the Board of Directors in 2022; a policy that determines AO's position on and handling of data ethics issues. In that connection, a data ethics working group was established. It ensures that the principles laid down by the Board of Directors are complied with, and it reports findings to AO's IT Security Council.

The data ethical principles agreed upon include, among other things:

- Management's dedication to data ethics
- Responsible processing of data in accordance with rules and society's perception
- Ensure transparency of processing operations
- Avoid discrimination and exclusion
- Support privacy and information security
- Training of employees.

In 2022, the data ethics working group had six meetings. The working group has found that the organisation and anchoring of the data ethics work is in place, that there is good transparency in AO's processing of personal data, that no challenges with discrimination and exclusion can be identified, that there is extensive and ongoing work with information security and data protection, and that there is appropriate training of the employees.

More specifically, the data ethics working group has discussed and obtained documentation on how sales prices to customers are determined, and it has been assessed whether discrimination is being carried out. The data ethics working group has found no cause for comments.

In 2023, the data ethics working group will, among other things, focus on the processing of data in the value chain, the handling of thefts, and the preparation of formal controls for the work on data ethics.