
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 21st February 2024

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 2023 and covers the accounting period from 1 January to 31 December 2023.

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').

Statement on Data Ethics

It is important for AO that customers and other business partners can trust AO's processing of data. AO has therefore chosen to focus on data ethics, so that it is constantly ensured that data is processed ethically for the common good of both customers and 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. This policy is based on a series of data ethics principles about

- 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.

AO wants all employees to be aware of the data ethics values that underlie AO's work with data. Therefore, information about AO's policy on data ethics will be made available on an ongoing basis, and all employees must complete a data ethics training course.

In 2023, AO worked with two aspects of AO's data ethics policy.

Firstly, it was assessed whether AO uses data on theft in an appropriate way. Therefore, a series of interviews were conducted with a view to uncovering the specific handling and use of data. This gave rise to marginal adjustments to the procedure.

Secondly, the data ethics working group assessed whether AO processes data in such a way that data is used to discriminate against different groups – particularly in connection with employment. No forms of discrimination were identified at AO in connection with the assessment made by the working group. However, input was given as to how a

discrimination policy could be updated and extended in order to future proof AO's good results.

In addition to this year's two focus areas, minor adjustments have been made to the data ethics policy. No fundamental changes have, however, been made to the established data ethics principles in AO's policy on data ethics.

In 2024, the data ethics working group will, among other things, look into the possibilities of establishing an internal course in data ethics for the employees, and evaluate whether AO's customers could get more out of the data that AO makes available to them.