

Report on data ethics pursuant to section 99d of the Danish Financial Statements Act

This report forms a part of the management commentary of the annual report of Ørsted A/S concerning the financial year 1 Jan – 31 Dec 2025.

Danish regulation – Section 99d of the Danish Financial Statements Act – requires larger companies, which have a policy for data ethics, to supplement the management commentary of the annual report with a report on data ethics. The Executive Committee of Ørsted A/S approved the initial Data Ethics Policy in 2021. In 2023 a data ethics advisory board was established, and data ethics Terms of Reference were created.

The Data Ethics Policy outlines a set of data ethics principles that support ethical decision making when using data across the value chain. This includes having a legitimate purpose when we collect data, refraining from automating decisions that impact individuals, respecting the privacy of individuals, and being transparent in data ethical choices we make.

With processes in place to collect and to handle data ethical concerns reported by Ørsted employees or by external parties, and processes to assess if data processing in new applications is causing any data ethical concerns, Ørsted has a solid foundation to monitor and improve our work with data ethics. Based on this work, it is our expectation to continue processing data and using technologies in a responsible, sustainable and transparent way.

Ørsted is committed to responsible use of data. Our data ethics principles set expectations for mindful data collection, high standards for data use, protection of privacy, transparency, and refraining from profiling and automated decisions that significantly impact individuals. Oversight and implementation are anchored in established governance and processes. The principles also guide our approach to emerging technologies, including artificial intelligence. To embed these principles in practice, we offer a company-wide AI training programme, including an Introduction to Responsible use of AI.

Ørsted's Data Ethics Policy, pursuant to section 99d of the Danish Financial Statements Act, can be found at: <https://orsted.com/-/media/www/docs/corp/com/about-us/corporate-governance/2021/data-ethics/data-ethics-policy.ashx>