

# 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 2024.**

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.

**Achievements in 2024**

- Conducted a survey for the initial rollout of Microsoft 365 Copilot.
- Integrated data ethics assessments into the onboarding process for new applications.
- Established guidelines for the responsible use of AI, with a focus on data ethics.
- Launched a corporate AI training program that includes ethical considerations.

**Planned activities**

To align with essential data ethics standards, we have planned the following initiatives for 2025 to support compliance and responsible data management:

- Continued focus on privacy and trust in human interactions involving AI technologies.
- Promoting fair, inclusive and transparent criteria at Ørsted to democratize the use of AI.