

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 2022.

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. During 2022, we have further developed the core principles that outline how Ørsted works with data ethics and implemented them in the updated version of Ørsted's Data Ethics Policy.

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 2022

- Data ethics policy updated with revised principles
- New process established for reporting of data ethical concerns, incl. use of the [whistleblower hotline](#) for both internal and external parties
- Data ethical considerations added to existing IT system assessment process
- New process and governance established to handle and evaluate data ethics reporting

Planned activities

- Manage reported data ethical concerns
- Continuously improve current processes to:
 - Identify data ethical dilemmas
 - Assess data ethical considerations
 - Evaluate data ethical consequences
- Establish new data ethics initiatives where seen relevant