

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

2 February 2022

This report forms a part of the management commentary of the annual report of Ørsted A/S concerning the financial year 1 January – 31 December 2021.

New 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. During 2021, we have considered how to work with data ethics in Ørsted, including whether it was relevant for the company to have a policy for data ethics. Based on dialogue with stakeholders across the company, it was decided to put in place a policy for data ethics to provide a framework for the company's activities within this area. Our data ethics policy is available on our website. The Data Ethics policy outlines that Ørsted is committed to uphold transparency and openness concerning our use of personal and non-personal data. Ørsted will set high standards in relation to where we collect data and how we use it. This includes encouraging our partners to determine data ethical principles for their own company, only disclosing data to third parties if it is strictly necessary and refraining from extensive collection of data which may be characterized as surveillance.

With the data ethics policy now in place, Ørsted will in 2022 initiate further development, analysis, and implementation of the policy, including implementation of further mechanisms and compliance controls to facilitate our work with data ethics. Based on this work, it is our expectation that the policy will be updated accordingly towards the end of 2022.

Achievements in 2021

- Internal stakeholder alignment re. data ethics in Ørsted
- Organizational anchoring of policy ownership
- Policy preparation and management approval

Planned activities

- Identify relevant data processing
- Identify data ethical dilemmas
- Analyze purposes of relevant data processing
- Assess data ethical considerations
- Evaluate data ethical consequences of relevant data processing