

# DONG Energy

GRI report  
2009



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## **Brief note on the format of this report**

This GRI responsibility report 2009 originally took the form of a website. To simplify our archive of responsibility reports, DONG Energy has extracted all content from the website and included it in this pdf report. From April 2014, the report will therefore only be available in this format. The pdf report contains the exact same information but the aesthetics and user-friendliness may have been affected compared to the original format.

## GRI Content index

DONG Energy's reporting is in accordance with Global Reporting Initiative's (GRI) sustainability reporting guidelines (GRI3) and GRI's draft Electric Utility Sector Supplement. The supplement includes 29 indicators (called 'EU') particularly formulated for electric utilities. DONG Energy has followed the GRI3 guidelines for reporting on profile, management strategies and indicators.

The following symbols indicate the extent to which the reporting complies with the GRI3 guidelines, including the indicator protocols.

GRI indicators:



No reporting



Partial reporting



Full reporting

## APPLICATION OF GRI GUIDELINES

Report Application Level		C	C+	B	B+	A	A+
STANDARD DISCLOSURES	G3 Profile Disclosures	Report on: 1.1 2.1-2.10 3.1-3.8,3.10-3.12 4.1-4.4,4.14-4.15			Report on all criteria listed for Level C plus: 1.2 3.9, 3.13 4.5-4.13,4.16-4.17	Same as requirements for Level B	
	G3 Management Approach Disclosures	Not Required	Report Externally Assured	Management Approach Disclosures for each Indicator Category	Report Externally Assured	Management Approach disclosed for each Indicator Category	Report Externally Assured
	G3 Performance Indicators & Sector Supplement Performance Indicators	Report on a minimum of 10 Performance Indicators, including at least one from each of: social, economic, and environment		Report on a minimum of 20 Performance Indicators, at least one from each of: economic, environment, human rights, labor, society, product responsibility		Respond on each core G3 and Sector Supplement indicator with due regard to the materiality Principle by either: a) reporting on the indicator or b) explaining the reason for its omission.	



## Profile

### 2.1 Strategy and Analysis

#### GRI:1.1 CEO Statement



Responsible Energy 2009, page 1

#### GRI: 1.2 Description of key impacts, risks, and opportunities



Annual report 2009, page 28-33 and Responsible Energy 2009, page 4-6

### 2.2 Organizational profile

#### GRI: 2.1 Name of the organisation



Annual report 2009 cover

#### GRI: 2.2 Primary brands, products, and/or services



Annual report 2009, page 6-7

#### GRI: 2.3 Operational structure of the organization, incl. main divisions, operating companies, subsidiaries, and joint ventures



Annual report 2009, page 157-161

#### GRI: 2.4 Location of organization's headquarters



Annual report 2009, cover

**GRI: 2.5 Countries where the organization operates**



Annual report 2009, page 6-7, 37, 43, 45, 49 and 57

**GRI: 2.6 Nature of ownership and legal form**



Annual report 2009, page 60

**GRI: 2.7 Markets served**



Annual report 2009, page 6-7

**GRI: 2.8 Scale of the reporting organisation**



This indicator includes a lot of information about the enterprise both financial and non-financial.

Of non-financial data is reported produced oil, natural gas, heat and power. Furthermore distributed and sold volumes of natural gas and power are reported. Volumes sold that are used internally are excluded as only the volumes which generate external revenue should be included in accordance with the GRI definition.

In addition to this also the number of employees is reported.

The most important non-financial parameters for this indicator can be seen in the annual report page 5. For details on the financial parameters see page 4.

For data from previous years and more details on the non-financial parameters see appendix: *production, distribution and customers and sales* respectively.

**GRI: 2.9 Significant changes during the reporting period regarding size, structure or ownership**



Annual report 2009, page 113-117, 162-166

**GRI: 2.10 Awards received in the reporting period**



Fritz H. Schur, Chairman of the Supervisory Board, was named Chairman of the Year by boardnews.no in collaboration with Berlingske Tidende and PricewaterhouseCoopers Board Forum.

The research institute Catinét has appointed DONG Energy number one amongst companies with particularly good media relations. It is the commitment to respond, the level of activity and the friendliness that secures the top ranking.



DONG Energy's employee magazine, Respons, issued internally four times a year, has been elected Employee Magazine of the Year 2009 by the Association of Internal Communications.

## 2.3 Parameters

### **GRI:EU1 Installed capacity, broken down by primary energy source and by regulatory regime**



This indicator provides information about the scale of DONG Energy operations in terms of capacity for heat and electricity production.

### **GRI:EU2 Net energy output broken down by primary energy source and by regulatory regime**



This indicator is reported under indicator 2.8

### **GRI:EU3 Number of residential, industrial, institutional and commercial customer accounts**



This indicator provides information about the scale of our sales activities within gas and power in different countries as it depicts the number of customers in each country.

As the sales of power and gas in Denmark are partly public regulated the Danish customers are broken down by sales to "free" (dansk: markedsvilkår) and "non-free" (dansk: forsyningsvirksomhed) customers. As we do not operate with the groups: commercial and industrial customers, as two separate segments these are reported as one single group.

### **GRI:EU4 Length of above and underground transmission and distribution lines by regulatory regime**



The length of the power distribution lines and the gas distribution network give an indication on the size of the Distribution segment of DONG Energy

The length of the power distribution lines by voltage are defined by three segments of voltage; 0,4kV, 10kV and 30/50kV. This indicator also comprises power transformer stations which are measured by number.

### **GRI:EU5 Allocation of CO2e emissions allowances or equivalent, broken down by carbon trading framework.**



Profiles, GRI:EU5. See Appendix.

### **GRI:3.1 Reporting period**



Annual report 2009, page 162-166

### **GRI:3.2 Date of the most recent report**



Reference to the web, the site does not exist anymore.

### **GRI:3.3 Reporting cycle**



Annual report 2009, page 162-166

### **GRI:3.4 Contact person for questions regarding the report and its content**



Annual report 2009, front cover

### **GRI:3.5 Process for defining report content**



#### **Relevance and materiality**

Corporate responsibility Corporate

Responsibility must ensure that a systematic review is performed annually of the items included in the reporting for the coming year and the data compiled. The review must be performed by 1 October. A review performed in autumn 2010 (based on the 2009 reporting) may therefore imply changes in the reporting policies for 2011. Such an evaluation did not take place in 2008, which is why the 2009 reporting is based on the same indicators as in 2008.

However, compared to 2008, some changes have been made. LA11 has not been reported on because it was initially evaluated not material - which is also evident in the GRI response for 2008. There are no responses to HR5 and HR7 since none of DONG Energy's locations have been evaluated as being at risk of infringement of voluntary unionism or at risk of forced labour. EU2, EU15 and EU16 are new indicators from GRI. DONG Energy has chosen to respond to these in 2009 although no evaluation of materiality has been made

Such systematic review will be based on the method used to identify the indicators on which the company would like to report in 2008. The method may be developed, for example by input from external stakeholders and the company's business areas and staff being included. The method selected will be described and will be made available to the public.

The items and types of data should be selected on the basis of relevance and materiality to the users of the external reporting and the internal management reporting. In addition, Corporate Responsibility may on an ongoing basis revise the requirements for the individual items and types of data if the basis is revised. Corporate Responsibility determines which stakeholders should be involved in this selection.

Reporting by DONG Energy is based on the Global Reporting Initiative (GRI), version 3, and the Electricity Utility Sector Supplement. A supplement for the oil and gas sector has yet to be drafted to form the basis of reporting.

The GRI provides generic descriptions of relevant data areas and their structure within CSR.

#### **Materiality**

DONG Energy aims to include in our corporate responsibility reporting any information defined as material according to the materiality principle of the AA1000 Assurance Standard. Information on our social, environmental and financial performance is considered material if it is required by our stakeholders for them to be able to make informed judgments, decisions, and actions.



The Materiality Principle of the AA1000AS focuses on what is important to stakeholders, as well as accurate. Material information is thus characterized by the fact that its omission or misrepresentation in the report could influence the judgments, decisions, and actions of our stakeholders.

AccountAbility recommends applying a five-part materiality test to determine whether information is material. The five parameters to consider are whether there are:

- 1) Direct short-term financial impacts (incl. compliance with legislation)
- 2) Own policies to measure performance against
- 3) Norms established within business peers
- 4) Stakeholder behaviour and concerns
- 5) Societal norms that are relevant

When assessing materiality against these five parameters, parameters 1 and 2 can be combined to form the GRI factor of materiality, "Significance of economical, environmental, and social aspect", while parameters 4 and 5 can be combined into the factor "Influence on stakeholder assessments and decisions".

In order to be AA1000AS compliant, a procedure must exist for testing materiality. Our procedure for testing whether information, including information contained in GRI indicators, is material is to assign values of 1 through 5 to each of the parameters 1, 2, 4, and 5. The factors of "significance" and "influence on stakeholders" are then calculated as average assigned values on parameters 1-2 and 4-5 respectively.

Finally, the two factors are plotted in a matrix and an aspect is determined to be material if "significance" x "influence on stakeholders" is above 4.5.

The last AccountAbility parameter, (3) Norms established within business peers, is taken into account by applying this evaluation procedure on industry specific indicators. One set of such indicators is the EU indicators in the GRI Electric Utility Sector Supplement. Other reflect norms pertaining to the other business areas in DONG Energy's portfolio, not the least the E&P sector.

Assigning values to parameters 1, 2, 4, and 5

Values between 1 and 5 are assigned to each of the four parameters 1, 2, 4, and 5 based on evaluation of the questions below. The total score of a parameter may be high either because the answer is "yes" to all questions relating to the parameter, or because the answer to one question is a very strong "yes". In other words, positive answers to all questions are not necessary for a high score.

1) Short term financial impact

- Are there direct and significant costs or financial benefits linked to the indicator?
- Is the indicator covered by regulation, and is non-compliance a significant risk factor?
- Does the activity linked to the indicator cause significant spending?

2) Covered by own policies

- Is the indicator directly covered by existing policies, targets or commitments?
- Is the indicator indirectly covered by policies or commitments and is the level of impact not marginal?

4) Impact on stakeholder behaviour and concerns

- Is the indicator within the area of interest of an identified, relevant stakeholder?
- Is the impact the indicator describes non-marginal?
- Has the stakeholder raised concern or is he/she likely to do so?

5) Covered by societal norms

- Is this an area where society expects business to report? Is the indicator within an area where future legislation is foreseen

### **GRI:3.6      Boundary of the report**



Annual report 2009, page 162-166

**GRI:3.7 Specific limitations on the scope or boundary of the report**



See GRI:3.5

**GRI:3.8 Basis for reporting on joint ventures, subsidiaries, leased facilities, outsource operations etc.**



Annual report 2009, page 162-166

**GRI:3.9 Data measurement techniques and the basis of calculations**



Annual report 2009, page 162-166

**GRI:3.10 Explanation of the effect of any re-statements of information in earlier reports**



Annual report 2009, page 162-166

**GRI:3.11 Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report**



Annual report 2009, page 162-166

**GRI:3.12 GRI Content index**



See GRI Content index

**GRI:3.13 Assurance**



Annual report 2009, page 162-166

## 2.4 Governance, commitments and engagement

**GRI:4.1**      **Governance structure of the organization, including committees under the highest governance body**



Annual report 2009, page 60-61

**GRI:4.2**      **Indicate whether the Chair of the highest governance body is also an executive officer**



Annual report 2009, page 1 and page 63

**GRI:4.3**      **The number of members of the highest governance body that are independent and/or nonexecutive**



Annual report 2009, page 60-61

**GRI:4.4**      **Mechanisms for shareholders and employees to provide recommendations or directions to the highest governance body**



Annual report 2009, page 60-61

**GRI:4.5**      **Linkage between compensation for members of the highest governance body, senior managers, and executives, and the organization's performance (incl. social and environmental performance)**



Annual report 2009, page 61 and page 86-87 (staff expenses note 5)

**GRI:4.6**      **Process in place for the highest governance body to ensure conflicts of interest are avoided**



Annual report 2009, page 61

**GRI:4.7**      **Process for determining the qualifications and expertise of the members of the highest governance body**



Annual report 2009, page 60-61

**GRI:4.8**      **Internally developed statements of mission, values, etc. and the status of their implementation**



Responsible Energy 2009, page 2 and page 18

**GRI:4.9 Procedures of the highest governance body for overseeing the organization's identification and management of economic**



Annual report 2009, page 61

**GRI:4.10 Processes for evaluating the highest governance body's own performance**



Annual report 2009, page 61

**GRI:4.11 Explanation of whether and how the precautionary approach or principle is addressed**



Annual report 2009, page 28-29 and Responsible Energy 2009, page 4-7

**GRI:4.12 Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organization subscribes or endorses**



DONG Energy became signatory to the UN Global Compact in 2006, and our work is guided by its principles. In 2008, DONG Energy became a member of the World Business Council for Sustainable Development (WBCSD) and of Business Social Responsibility (BSR.org). In addition, DONG Energy's reporting is in compliance with the Global Reporting Initiative.

**GRI:4.13 Memberships in associations and/or advocacy organizations**



Find the response under SO5

**GRI:4.14 List of stakeholder groups engaged by the organisation**



In 2009, DONG Energy engaged in dialogue, both centrally and locally, with its external community on a whole range of issues, including:

**Climate**

- WWF
- The Danish Society for Nature Conservation
- Greenpeace
- The Danish Consumer Council
- The Information Center for Environment and Health
- Experts in Denmark and abroad Environment

**Environment**

- The Danish Council of Sustainable Business Development
- Neighbours
- Public meetings

**Customers**

- Customer meetings and visits
- Public authorities and enterprises
- Focus groups

## Employees

Liaison committees  
Safety committees  
Experts  
Students

## Good business practices

Suppliers  
Amnesty International  
3F  
Global Compact companies and other exchange of experience fora

### **GRI:4.15** Basis for identification and selection of stakeholders with whom to engage



One of DONG Energy's core values is receptiveness. For this reason, it is important for us to discuss and coordinate expectations with our stakeholders. Consequently, we are in dialogue with the world around us and continuously seek to identify challenges and expectations in the public debate, both with respect to DONG Energy as a business, in relation to our industry and in relation to international companies in general.

Generally, DONG Energy has a good overview of our principal stakeholders in Denmark. We consider the organisations, opinion-makers, decisionmakers and citizens taking a proactive approach to our business or who - to a significant degree - are affected by our activities to be our stakeholders. We maintain a continued dialogue with these stakeholders at local, regional or national level.

In 2009, however, DONG Energy was characterised by two major events that determined our stakeholder dialogue - COP15 and our 85/15 strategy. In this dialogue, we focused on Greenpeace and WWF due to their international profile and the Danish Society for Nature Conservation since they also represent the local community.

In May, DONG Energy also held a joint dialogue meeting with Greenpeace. The meeting was a public debate held at the Copenhagen Business School where, among others, DONG Energy's CEO, Anders Eldrup, presented and discussed DONG Energy's climate action together with Mads Flarup Christensen, Secretary-General, at Greenpeace.

Internationally, we have an ongoing, informal stakeholder dialogue, and in 2009 we initiated work to map stakeholders in the countries in which we are represented. We will have a strategy for this dialogue in 2010.

### **GRI:4.16** Approaches to stakeholder engagement, including frequency by type and group



In 2009, DONG Energy's stakeholder dialogue was characterised by two major events - COP15 and our 85/15 strategy.

In respect of COP15, a number of meetings were held with different organisations throughout the year (including the Climate Consortium Denmark, the Confederation of Danish Industry (DI), World Business Council for Sustainable Development), while in relation to the 85/15 strategy bilateral meetings were held in November and December 2009 with, among others, Greenpeace, WWF and the Danish Society for Nature Conservation.

In 2010, we will follow up on the dialogue meetings with NGOs through, among other things, major round table talks in spring where we want to discuss partly the input we have received at the meetings and partly provide a basis for new cooperative platforms and knowledge sharing. At the same time, we will present a new strategy for stakeholder management in 2010.

Please also see GRI 4.15 and 4.17.

### **GRI:4.17** Key topics and concerns that have been raised through stakeholder engagement



The most important subjects discussed with our stakeholders have related to our climate strategy and 85/15 strategy.

The following subjects were included in the dialogue:

When and how fast will DONG Energy increase the volume of wind energy and the use of biomass?

How, specifically, will DONG Energy increase the volume of biomass?

What is the extent of the future coal, oil and gas consumption expected to be relative to the 85/15 strategy?

Please also see "Responsible energy 2009", pages 2-7.

## **2.5 Management Approach**

### **Management approach, economy**



Responsible energy 2009 page 2.

### **Management approach, environment**



Responsible energy 2009 page 2.

### **Management approach, labour practise**



Responsible energy 2009 page 2.

### **Management approach, human rights**



Responsible energy 2009 page 2.

### **Management approach, society**



Responsible energy 2009 page 2.

### **Management approach, products**



Responsible energy 2009 page 2.



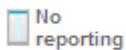
## Products

**GRI:EU23** Programs, including those in partnership with government, to improve or maintain access to electricity and customer support services



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5

**GRI:EU24** Practices to address language, cultural, low literacy and disability related barriers to accessing and safely using electricity and customer support services



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5

**GRI:PR1** Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures.



DONG Energy continually seeks to minimise the potential impacts of our products and services on the health and safety of our customers and citizens.

This is done through compliance with legislation and systematic environmental and work environment management at all stages of production, storage and distribution processes and through energy advice and production development.

DONG Energy's power and gas products are governed by legislation, and its production is subject to environmental approval.

DONG Energy is in compliance with the Danish heavy current regulations, if all installations are secured in the best way possible, including customer installations. Therefore, our safety and quality management system (the SKS system) has been approved by an independent supervisory body.

High-voltage plants – stations and underground cables as well as overhead cables – create electromagnetic fields. During the past 30 years, researchers all over the world have worked to uncover whether magnetic fields from power supply plants could constitute a health risk. It has still not been possible to provide an unambiguous answer to this question. The general opinion is that the magnetic and electric fields from our plants do not constitute a health hazard.

DONG Energy is represented on the industry's magnetic field committee that among other things assesses the potential impact of the magnetic and electric fields on citizens as well as employees. Its seat on this committee ensures that DONG Energy quickly receives new knowledge within this field.

DONG Energy has made no actual life cycle assessments of the products in relation to safety and health measures.

**GRI:PR2 Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.**

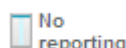


DONG Energy's key products targeting the end-customer market are power and gas, and hence our indicator response solely refers to these products. 2009 saw no legal proceedings, neither pending nor settled, considering the impact of the products on customer safety and health with respect to DONG Energy's distribution and sale of power and gas.

Nor has DONG Energy received any warnings from the Danish authorities or registered any incidents of violation of internal rules and requirements.

Each year, we experience several incidents and legal proceedings as a result of e.g. excavation damage to cables and installation failures relating to rerouting and erection of new buildings. In such cases, it has been possible to assign liability to suppliers, e.g. certified electricians etc. who have either caused the installation failures or failed to comply with the required precautionary measures.

**GRI:EU25 Number of injuries and fatalities to the public involving company assets including legal judgments, settlements and pending legal cases of diseases**



No incidents in which citizens or customers were injured occurred in the business areas that distribute and sell power and gas.

No legal action was taken against DONG Energy in 2009 concerning illness or injury of members of the public relating to DONG Energy's activities.

**GRI:PR3 Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements**



The information below on products and services is required in accordance with DONG Energy's procedures for information on and labelling of products and services.

The reply includes 100% of the key products (power and gas).

Aspect concerning products	Information required – yes / no?
Suppliers of components for products	No
Content, especially substances that could have an environmental and social impact	Yes, cf. the power declaration
Safe application of the product	Yes – relates to distribution of gas
Disposal of the product and environmental and societal impacts ½	Not relevant – this is not relevant for power and gas and thus not for DONG Energy
Other (explain)	Yes, information on products , cf. the requirements set out in the Danish Marketing Practices Act and regulatory guidance

**GRI:PR4 Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling, by type of outcomes**



DONG Energy's key products targeting the end-customer market are power and gas, and hence our indicator response solely refers to these products. Information requirements for these products appear both from legislation and guidelines based on industry practice and customs (voluntary codes):

In 2009, we have had no reports on violations or non-compliance with such practice and customs.

**GRI:PR5 Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.**



Once a year, DONG Energy carries out an extensive customer satisfaction survey amongst its residential customers, most recently in December 2009. It is based on representative samples from four different customer segments (Nord-el, City-el, and Natural gas customers), including data collected via e-mail and postal forms according to the respondent's own choice.

Our most recent survey shows a significant customer satisfaction and loyalty increase amongst City-el customers since last year's survey. See the table below:

Satisfaction queries are based on a scale from 1–10, and the results will be converted into index numbers on a scale from 0–100. To be able to decide whether a result is good or bad, one must know the typical satisfaction survey level. The figure below is based on Ennova's experience from previous satisfaction surveys and shows how results should be interpreted. The report includes a colour gamut placed next to the sorting cards to indicate whether the particular area is generally at a satisfactory level.

DONG Energy's target is a customer satisfaction level at 80 by 2012 - to be Best-in-class.

**PR5 Customer satisfaction survey 2009**

Once a year, DONG Energy carries out an extensive customer satisfaction survey amongst its residential customers. This survey was completed in December 2009. It is based on representative samples from three different customer segments (Nord-el, City-el, and natural gas customers), including data collected via e-mail and postal forms according to the respondent's own choice.

Our most recent survey shows a significant customer satisfaction and loyalty increase amongst City-el customers since last year's survey. See the table below:

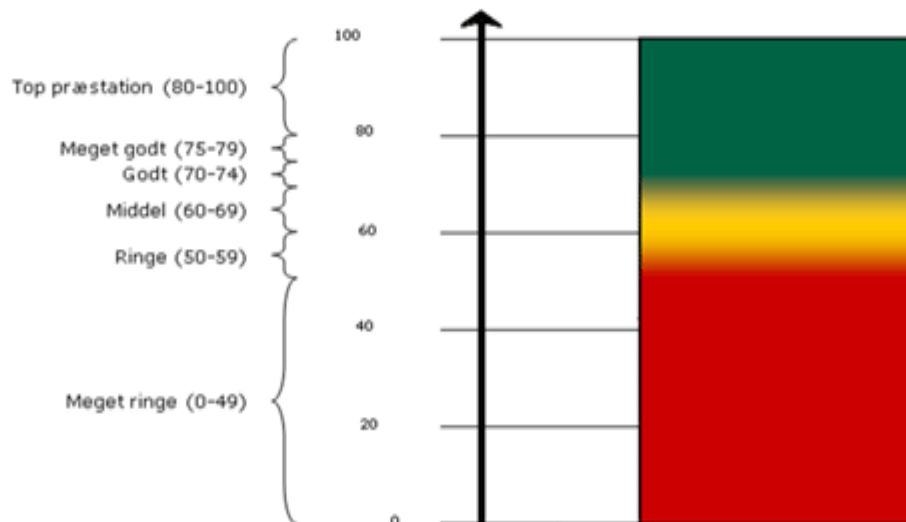
Customer Satisfaction Index	2009	2008	2007-2	Change in % from 2008 to 2009
Natural gas customers	77	77	72	0%
City-el customers	63	57	50	11%
Nord-el customers	68	69	64	-1%
Fibernet customers	Not included this year*	66	59	

Loyalty index	2009	2008	2007-2	Change in % from 2008 to 2009
Natural gas customers	77	79	72	-3%
City-el customers	62	53	45	17%
Nord-el customers	68	70	61	-3%
Fibernet customers	Not included this year*	69	60	

\*Fibernet was divested in 2009 and is therefore not included in the customer satisfaction survey

Satisfaction queries are based on a scale from 1–10, and the results are converted into index numbers on a scale from 0–100. To be able to decide whether a result is good or bad, it is important to know the typical satisfaction survey level. The figure below is based on Ennova's experience from previous satisfaction surveys and shows how results should be interpreted. The report includes a colour gamut placed next to the sorting cards to indicate whether the particular area is generally at a satisfactory level.

DONG Energy's target is a customer satisfaction level of 80 by 2012 - to be best-in-class.



**Explanation in English:**  
 Top performance (80-100)  
 Very good (75-79)  
 Good (70-74)  
 Medium (60-69)  
 Bad (50-59)  
 Very bad (0-49)

**GRI:PR6      Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.**



DONG Energy focuses strongly on compliance with applicable law within marketing, communications, sponsorships and other types of promotion. In this context, legislation of particular relevance in Denmark is the Danish Marketing Practices Act, the Danish Personal Data Protection Act, the Consumer Agreements Act, including equivalent acts in the Netherlands, Germany and Sweden.

In 2008, DONG Energy prepared compliance programmes to ensure that Danish rules on marketing and handling of customers' personal data are complied with. The compliance programmes have been issued in the form of leaflets that can be accessed on Vital's website under the tab "Sensible business conduct". Furthermore, relevant departments have been trained in Sales and Distribution in compliance with the Danish Personal Data Protection Act to ensure that they are familiar with the compliance programmes. The training was completed in 2009, but will subsequently be offered to new employees and provided when required.

Programmes for surveillance on the compliance program are still to be prepared.

As far as sponsorships are concerned, these have been dealt with in a leaflet on good business conduct ("acting responsibly – how we ensure good business conduct") which was adopted by DONG Energy's supervisory board in 2008. The leaflet is accessible on Vital under the tab "Sensible business conduct" and will also be distributed to all group employees.

DONG Energy does not sell products that are subject to prohibitions, but some customers question the amount of fossil fuels used in energy generation.

**GRI:PR7      Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes.**



In 2009, the Dutch authorities decided to set a limit on the tariffs of the Dutch distribution company, DONG Energy Sales B.V. Consequently, the company was required to adjust its tariffs and also repay the customers an amount, which in total adds up to approximately EURO 170,000.

Also in 2009, the Dutch authorities have indicated that DONG Energy Sales B.V. failed to communicate in time its tariffs to the customers. At this point in time, no formal claim has been presented by the Dutch authorities to the company.

**GRI:PR8      Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.**



We received one complaint in 2009. The complaint was caused by a defect which led to a small number of customers being given access to limited information about other customer's readings and only for a limited period of time.

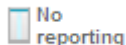
**GRI:PR9      Monetary value of significant fines for noncompliance with laws and regulations concerning the provision and use of products and services.**



In 2009, the Dutch authorities decided to set a limit on the tariffs of the Dutch distribution company, DONG Energy Sales B.V. Consequently, the company was required to adjust its tariffs and also repay the customers an amount, which in total adds up to approximately EURO 170,000.

Also in 2009, the Dutch authorities have indicated that DONG Energy Sales B.V. failed to communicate in time its tariffs to the customers. At this point in time, no formal claim has been presented by the Dutch authorities to the company.

**GRI:EU26 Percentage of population unserved in licensed distribution or service areas**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5

**GRI:EU27 Number of residential disconnections for non-payment, broken down by duration of disconnection and by regulatory regime**



See the table in the Appendix: Products, Distribution.

**GRI:EU28 Power outage frequency**



GRI defines the power outage frequency as the total number of customer interruptions divided by total number of customers served.

The frequency of power outages experienced by customers is expressed through SAIFI, which stands for System Average Interruption Frequency Index. It reflects the average frequency of interruptions per customer per year. It is reported as a total for DONG Energys distribution grids.

See the Appendix: Distribution.

**GRI:EU29 Average power outage duration**



The duration of power outages experienced by customers is expressed through SAIDI (System Average Interruption Duration Index), which reflects the average duration of interruptions per customer per year.

See the Appendix: Distribution.

**GRI:EU30 Average plant availability factor by energy source and by regulatory regime**



It is important that the power stations are available when their capacity is required to ensure the necessary energy supply and to avoid fluctuations between energy supply and consumption, as this might lead to power failure. Likewise, it is important to exploit the wind turbines' power-producing capacity as much as possible by ensuring a high availability rate of the turbines.

See the Appendix: Capacity



## Economy

### **GRI:EU6 Management approach to ensure short and long-term electricity availability and reliability**



Our approach in maintaining both the long-term and short-term functionality and value of our power distribution grids is lifecycle optimization. We continuously analyze the trends in costs of operation and maintenance together with the level of security of supply for comparison with the cost of replacement of each asset group to determine what we believe to be the optimum economical/technical lifespan and to retain reliable supply at existing levels. Our operation costs are benchmarked by the Regulator to ensure a recent level over time throughout the Danish distribution companies. The benchmark also covers security of supply.

In order to meet the regulatory requirements on improving the reliability of supply, all incidents of interrupts are recorded and the different types of interruptions are evaluated and specific means may be taken based on the assessments in order to increase the future level of reliability of supply. We participate in forming the regulatory framework in cooperation with Danish energy association. To protect the power supply from weather damage, and to improve our power distribution grids, we are in the process of replacing all low voltage overhead lines with underground cables.

Short-term approach includes regular condition supervision of the key elements in the grid. We continuously follow changes in demand at our customers and consider the future grid structures regarding combined heat and power production and integration of renewable. To ensure stability under extreme system conditions, the grid has automatic and manual load shedding in case of a frequency drop caused by power deficiency.

### **GRI:EU7 Demand-side management programs including residential, commercial, institutional and industrial programs.**



See the response in the Appendix: Customers and Sales

### **GRI:EU8 Research and development activity and expenditure aimed at providing reliable electricity and promoting sustainable development**



In the energy sector, there is a great need for innovation and new research. In 2009, DONG Energy's research and development budget was DKK 250m, of which DKK 197m was spent. Research expenses were lower than planned, which is primarily owing to the fact that research and development costs were reduced by 50m as a result of the general cost reduction in mid-2009. A number of research and development projects were stopped and others were cut back.

In addition to the above costs, we have invested a considerable amount in completing our second-generation, full-scale bioethanol demonstration plant in Kalundborg.

In 2009, DONG Energy chose to focus on the forward-looking research effort surrounding four strategic areas: Flexible Customer Solutions, Offshore Power Generation, Biomass and Waste and Combined Heat and Power Production:

Flexible customer solutions: DKK 32m

Flexible customer solutions cover: Power balancing, small-unit aggregation, "virtual power plant", smart grid ideation and analysis collaboration, local energy, production, consumer and B2B "green energy" and energy savings concepts. To this is added electric cars, usage patterns and charging optimisation.

Offshore power generation: DKK 54m

Offshore power generation covers: Continued offshore windpower optimisation, foundations, forecasts, new concept development. To this is added ocean energy analyses and wavepower demonstration collaborations.

Biomass and waste: DKK 69m

Biomass and waste cover: Gasification: Initiation of LT-CFB demonstration project as well as the completed construction of a demonstration plant for 2nd generation bioethanol, continued development of fermentation and technologies for various biomass and waste fractions

Combined Heat and Power production: DKK 42m

Combined Heat and Power production covers continuous improvement of high-efficiency combined heat and power production using fossil and mixed fuels.

**GRI:EU9 Provisions for decommissioning of nuclear power sites**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:EC1 Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments**



Annual report 2009, page 4.

**GRI:EC2 Financial implications and other risks and opportunities for the organization's activities due to climate change**



DONG Energy's CEO, Anders Eldrup, is highly involved in the strategic work in combating climate change through several external fora, see SO5, where several considerations on climate change and the solutions of this is expressed and through implementing the new strategy for DONG Energy with regards to cleaner production of electricity.

Climate change in Denmark and northern Europe will cause more rain in winter, less in summer, milder winter and hotter summers, higher sea level as well as more extreme weather such as more wind and more extreme storms. This increases the risk of physical effects on buildings, constructions and harbours etc. This also proposes a risk for DONG Energy assets. DONG Energy has evaluated this fact and found that more focus on these risks will be necessary in the coming years. DONG Energy has addressed this specific risk in each business unit through an systematic process.

The climate change and greenhouse effect will also create different weather conditions which will affect the electricity demand and production from renewable energy sources. The DONG Energy innovation center, as part of the R&D department, is working estimating the consequences of such though e.g. the Nordic Project on Climate and Energy.

Climate change gives rise to certain regulatory risks arising from uncertainty about long-term public policy pertaining to combating climate change at national, EU and global levels of government. These uncertainties will affect the perception of risk associated with investments in new energy infrastructure and technological development.

The cost of activities to the organisation from complying with new regulation pertaining to combating climate change is partly a function of the cost of CO2 emissions in the EU. In a broader perspective, DONG Energy's recent announcement of a significant focus on investments in renewable energy production capacity can also be viewed as a proactive adjustment to an anticipated future low-carbon regulatory regime. In this perspective, the regulatory risks associated with new investments in coal-fired energy production capacity are perceived as relatively high at the present moment. The widespread use of carbon capture and storage (CCS) technologies or the need to ensure security of supply could in principle modify this specific risk. The administrative costs to the organisation of complying with new climate change regulation are estimated to be relatively modest compared to the other climate compliance costs described above.

Climate change offers multiple opportunities to provide new technologies, products, or services to address challenges related to climate change. DONG Energy is acting in order to reap some of these opportunities.

Our R&D effort has a very strong focus on renewable energy technologies read more here (link til web R&D indicator).

In our product offering, DONG Energy recently introduced “clean-tech” solutions to our end-costumers, for example heat-pumps and energy efficiency reviews of households. In addition, DONG Energy offers energy efficiency solutions to companies and a multi-aspect “climate partnerships” C59with businesses or public authorities such as municipalities.

Regulatory and technological challenges arising from climate change offers potential competitive advantages to DONG Energy. Our strong focus on increasing our use of renewable energy sets us apart from many other energy companies. Today, DONG Energy is on a global scale a major player in the field of offshore wind energy.

The financial implications of climate change is difficult to quantify since it is dependant a number of uncertain factors including the climate change geographical consequences, political reactions and technological innovations and technologies. DONG Energy's new strategy on combating climate change includes investments and strategic work for the next decades. DONG Energy works continuously with solutions to financially and strategically fulfilling the strategy and combating climate change. Some of this strategic work is based on the assumption of a high price CO2 and a long sighted climate agreement.

Climate change affects the financial position of DONG Energy indirect by affecting the energy market, especially the markets for CO2-quotas, green certificates and other support schemes. The conditions for pricing of latter markets are political decided. Price on CO2quotas etc. is continuously analyzed by DONG Energy to evaluate among other marked risks. Read more about DONG Energy's management of financial risk in the annual report page 12.

**GRI:EC3 Coverage of the organization's defined benefit plan obligations**



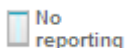
This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:EC4 Significant financial assistance received from government**



Annual report 2009, page 90.

**GRI:EC5 Range of ratios of standard entry level wage compared to local minimum wage at significant locations of operation**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:EC6 Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation**



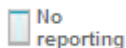
This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:EC7**      **Procedures for local hiring and proportion of senior management hired from the local community at locations of significant operation**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GR:3.5.

**GRI:EC8**      **Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:EC9**      **Understanding and describing significant indirect economic impacts, including the extent of impacts**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:EU10**      **Planned capacity against projected electricity demand over the long-term, broken down by energy source and regulatory regime**



See Appendix: EU10.

**GRI:EU11**      **Average generation efficiency of thermal plants by energy source and by regulatory regime**



Generation efficiency is a constant focus in operating all the company's electricity producing facilities.

Average generation efficiency is defined as the energy produced from the energy input into the heat and power production stations. The indicator is broken down by central and decentral power stations.

See Appendix: Capacity.

**GRI:EU12**      **Transmission and distribution losses as a percentage of total energy**



The loss of electricity in distribution and transmission indicates the efficiency of operating the grids. It is important to operate with high efficiency for both economic and environmental reasons.

DONG Energy only operates distribution grids.

The efficiency of the distribution networks is calculated as net deliveries divided by gross deliveries. No distinction is made between technical and non-technical losses in this connection. See Appendix: Distribution.

## Environment

### GRI:EN1 Materials used by weight or volume



According to the GRI definition, materials used comprise the use of raw materials, the use of associated process materials and materials for packaging purposes for manufacturing the enterprise's products.

For energy companies such as DONG Energy, this will to some extent overlap with our direct energy consumption, which is reported under EN3 – Direct energy consumption, since the materials for the generation of energy are raw materials such as coal, oil, biomass, waste and gas. As a result, the responses to EN1 and EN3 will naturally overlap. The use of fuels for transportation is not included. This is reported separately under EN29 – Significant environmental impacts of transporting products and other goods and materials used for the organisation's operations, and transporting members of the workforce.

GRI's distinction between direct and indirect material consumption, according to which direct consumption is defined as the use of materials found in the final product, is not applied, as this would not be meaningful in relation to DONG Energy's products. Instead, we distinguish between the consumption of raw materials, i.e. the consumption of energy resources, including biomass and waste incinerated for the generation of power and heat, and the consumption of ancillary materials, i.e. chemicals. With respect to the consumption of natural gas, flaring and venting carried out for safety or similar purposes are also reported in addition to total consumption. Venting does not include natural gas emitted into the atmosphere through pipelines opened in connection with maintenance work etc., because such venting is assessed to be negligible.

A process to improve and homogenise knowledge and registration of chemicals has been started in 2009 in the whole of DONG Energy. It has resulted in a new joint system for handling of chemicals that will be implemented in the spring of 2010. The new chemicals database will make it possible to increase the methodical approach to working with chemicals in DONG Energy.

For information on consumption of materials and ancillary materials, see Appendix: Materials and energy consumption.

### GRI:EN2 Percentage of materials used that are recycled input materials



DONG Energy operates waste incineration plants that use household and industrial waste as fuel. Waste incinerated at waste incineration plants is reused material and replaces other raw materials in the generation of power and heat. Waste incineration is not considered to be recovery as defined in the Danish Executive Order on Waste Management. However, as waste incineration generates energy that has first priority in the grid, it replaces the potential consumption of other sources of energy, such as coal, oil and gas. This is normally called recovery of waste. Therefore DONG Energy considers recovery of waste as the most significant contribution in terms of reporting on the GRI-indicator.

The purpose of the GRI-indicator is to show the extent to which the enterprise seeks to avoid the use of virgin natural resources.

The level of recycling in DONG Energy has been calculated on the basis of the consumption of raw materials and not the total consumption of materials (raw materials and chemicals).

See recycled relative to total weight in Appendix: Materials and energy consumption.

### GRI:EN3 Direct energy consumption by primary energy source



According to GRI, this indicator should be reported as two parameters: the amount of fossil energy sources and the amount of renewable energy sources. For energy companies such as DONG Energy, this overlaps to some extent with EN1, as DONG Energy's primary material consumption consists of energy sources such as coal, oil and natural gas. The

interesting aspect of this indicator is the ratio between renewable and fossil energy sources, and thus the focus on more sustainable energy consumption. In contrast, EN1 focuses on the enterprise's use of resources.

DONG Energy buys, sells and generates primary energy. DONG Energy's total direct energy consumption equals the primary energy purchased and generated less the amount of primary energy sold on. DONG Energy primarily uses direct energy for generating power and heat. The consumption of direct energy therefore depends on consumer demand for power and heat.

The amount of fossil energy sources is calculated as the consumption of coal, oil and natural gas, excluding consumption relating to transportation, which is reported under EN29 – Environmental impacts of transporting products, materials and members of the workforce.

The amount of renewable energy sources is calculated as the share of fuels used in heat and power generation plants considered to be CO<sub>2</sub>-neutral. This includes biomass and waste considered to be CO<sub>2</sub>-neutral under the Danish CO<sub>2</sub> Allowances Act.

For information about the consumption of fossil raw materials, see Appendix: Materials and energy consumption

#### **GRI:EN4 Indirect energy consumption by primary source**



DONG Energy's indirect energy consumption is calculated as power and heat consumption in administration buildings, at pumping stations, gas facilities, etc., i.e. the consumption of power we purchase on the grid.

Consumption of power and heat in administration buildings and at plants that do not generate power and/or heat is calculated and translated into primary energy sources (coal, oil, gas, biomass, biogas, waste, wind, hydro, solar, nuclear power or other). The basis for the translation into primary fuel use can be seen together with data which is seen in the table: Materials and energy consumption.

The consumption of power and heat at power stations and for wind turbines is recognised under direct energy consumption and is reported under EN3.

For information on consumption, see Appendix: Materials and energy consumption.

#### **GRI:EN5 Energy saved due to conservation and efficiency improvements**



This indicator should in accordance with GRI reflect energy saved due to conservation and efficiency improvements. Reduced energy consumption due to reduced production capacity or outsourcing should not be included. Reduced energy consumption due to process redesign, conversion and retrofitting of equipment and changes in personnel behaviour should all be included, as the effective object of such project measures is to save energy.

In 2007, in connection with the Environmental Strategy, a target was set to reduce CO<sub>2</sub> emissions by 1 tonne per employee by 2012, generally called the 1 tonne less goal. In 2009 the first and many initiatives have been started to work toward this goal.

On top of this a long range of renovations and process redesign is taking place on each location, which are not included in the DONG Energy Environmental Strategy and are not reported for this indicator.

Energy savings for the initiatives that have been completed can be seen in Appendix under Emissions to air.

For additional information about 1 tonne less see the Responsible Energy page 16 and the Annual Report 2009 page 21.

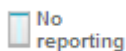


**GRI:EN6 Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives**



See the response in the Appendix: Customers and Sales.

**GRI:EN7 Initiatives to reduce indirect energy consumption and reductions achieved**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:EN8 Total water withdrawal by source**



According to the GRI definition, water consumption includes all water from any source (ground water, surface water, sea water, rainwater, waste water) withdrawn directly or through intermediaries such as water utilities.

Most of DONG Energy's water consumption is directly withdrawn, e.g. on oil or gas production platforms and at power and heat generation plants. Such consumption is regulated through licences.

The power stations, for example, use large volumes of water, e.g. for cooling water. The cooling water is "borrowed" from lakes, streams or the sea and is circulated through closed systems at the power station, after which it again is discharged to the lake, steam or the sea. Any temperature increases in the recipient after circulation have been agreed with the authorities and subject to monitoring.

For DONG Energy, the calculation of the consumption of ground water by administration and facilities is determined by whether the withdrawal is direct or indirect, as this reflects the impact on drinking water resources. Other forms of water consumption, such as cooling water and rain water, are not calculated, as they are considered to be less significant.

At DONG Energy's offshore production platforms, large volumes of water are drawn up together with oil. This so-called produced water is not used, but is treated and discharged into the sea or re-injected into the subsoil. For this reason, it is not included in the calculation of water consumption. It is, however, included under EN21 – Total water discharge by quality and destination.

For information on water consumption, see the Appendix: Water consumption and discharge.

**GRI:EN9 Water sources significantly affected by withdrawal of water**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:EN10 Percentage and total volume of water recycled and reused**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:EN11 Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas**



DONG Energy has power stations, wind turbines, cables, oil and gas activities close to protected areas – in Denmark as well as abroad.

Legislation is in force to ensure that our activities are assessed in relation to any impacts and that activities are initiated to control/minimise any impacts, in the project and closure phase as well as in the operational phase. It is found that it is not relevant to collect information on the location of DONG Energy's areas in relation to protected areas, since such information does not provide information on the impacts on biodiversity and the handling thereof.

For more information about how biodiversity aspects are handled in relation to DONG Energy's activities through legislation, see EN12.

**GRI:EN12 Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas**



Increased biodiversity focus in operations and projects within the EU is driven by legislation. The main part of DONG Energy's activities take place within the EU and are therefore comprised by European directives such as the VVM Directive, the Habitat Directive and the Bird Protection Directive. The directives define the framework for the assessment and handling of impacts of, among other things, the biodiversity, in the planning management to reduce the consequences of the activities as much as possible. This applies to impacts during the planning phase and during operation of the activity.

DONG Energy is familiar with this legislation from its project experience in Denmark and abroad, for instance in the UK where DONG Energy operates many offshore wind energy projects. DONG Energy handles biodiversity impacts within the EU through current legislation and through the engagement of relevant NGOs in the planning work.

Operational impacts on the environment are handled through environmental approvals which have been issued in compliance with current legislation.

To handle and minimise major impacts on the biodiversity area within the EU, it is therefore of primary importance to DONG Energy to ensure compliance with legislation and to maintain a good dialogue with regulatory authorities and NGOs.

DONG Energy is, however, involved in activities that are not subject to European legislation. Such activities are projects outside EU borders such as CDM projects and purchase of fuels, including biomass.

Decisions under the Kyoto Protocol define a procedure whereby the project host completes an environmental assessment through CDM project activities. During this procedure any impacts on biodiversity will be investigated as part of the socio-economic and environmental impacts. In addition, DONG Energy performs due diligence investigations of the CDM projects where ethical, environmental and health and safety aspects together with biodiversity impacts are also investigated.

For biomass purchases, it is our vision to endeavour to meet DONG Energy's requirements for CO<sub>2</sub>-neutral biomass which is completely environmentally sustainable and financially attractive.

For more information on our requirements for biomass and suppliers, visit:  
<http://www.dongenergy.dk/halmlicitation/halmlicitation/biomasse/Pages/index.aspx>

**GRI:EU13 Biodiversity of replacement habitats compared to the biodiversity of the areas that are being replaced**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:EN13 Habitats protected or restored**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:EN14 Strategies, current actions, and future plans for managing impacts on biodiversity**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:EN15 Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:EN16 Total direct and indirect greenhouse gas emissions by weight**



According to the GRI definition, greenhouse gas emissions include emissions from generation of electricity, heat and steam, other combustion processes such as flaring, physical or chemical processing, transportation of materials, products and waste, venting and fugitive emissions.

DONG Energy's most substantial emissions of greenhouse gases derive from the generation of power, heat and steam. We also include emissions of carbon dioxide, methane and other volatile organic compounds from physical and chemical processes at other facilities and in other administration buildings, including emissions from venting of natural gas and the burning of natural gas by flaring. Our reporting distinguishes between emissions of carbon dioxide from facilities that are subject to allowances and those that are not.

Fugitive emissions, e.g. from coal bunkers, are not included, as such emissions are considered to be less significant. According to the IPCC guidelines for National Greenhouse Gas Inventories, fugitive emissions of methane from coal storage facilities should also be included in the country in which mining takes place. As DONG Energy's activities do not include mining, this does not apply to us. Fugitive emissions of methane and NMVOC from oil tanks on Fredericia Oil terminal are, however, included, as DONG Energy considers these to be significant.

Emissions from transportation of products, materials and waste are not included. These are reported separately under EN29 – Significant environmental impacts of transporting products and other goods and materials used for the organisation's operations and transporting members of the workforce.

Significant indirect emissions of greenhouse gases derive from the consumption of power and heat. For DONG Energy, indirect emissions are only calculated for carbon dioxide. Indirect emissions do not include emissions based on consumption of power and heat for the generation of power and heat, as these are defined as direct emissions of greenhouse gases and are included in the relevant data types.

The sector supplement to GRI for electric utilities includes in EN16 emissions of greenhouse gases compared to produced energy total, produced energy from fossil sources and compared to energy delivered to customers.

DONG Energy's climate strategy 85/15 is founded on the CO2 emission compared to total produced energy and is therefore reported in response to the sector supplement. The two other requests are not reported.

To learn more about DONG Energy's 85/15 Strategy see Responsible Energy page 4-6 or the Annual Report 2009 page 10.

For information on the volumes and types of CO2 emissions and other greenhouse gases, see Appendix: Emissions to air.

#### **GRI:EN17 Other relevant indirect greenhouse gas emissions by weight**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

#### **GRI:EN18 Initiatives to reduce greenhouse gas emissions and reductions achieved**



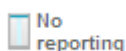
This indicator should in accordance with GRI reflect reduction of emissions identified under EN16. Such reductions result from measures such as energy savings identified under EN5 i.e. as a result of DONG Energy's 1 tonne less goal. Reduced emissions resulting from reduced generation or outsourcing are not included, nor are reduced emissions achieved by customers. Reduced greenhouse gas emissions resulting from projects for which the effective object is such reductions are reported.

One of the objectives to be achieved through DONG Energy's Environmental Strategy is to reduce our CO2 emissions. The Environmental strategy includes a goal to reduce CO2 emissions from DONG Energy's own energy consumption by 1 tonne per employee by 2012.

In 2009 the first and many initiatives have been started to work toward this goal. Reductions in greenhouse gas emissions for the completed initiatives and the current status for the goal of 1 tonne less CO2 per employee can be seen in the table Emissions to air.

Learn more about 1 tonne less in the Responsible Energy 2009 page 16 and in the Annual Report 2009 page 21.

#### **GRI:EN19 Emissions of ozone-depleting substances by weight**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

## **GRI:EN20 NO, SO, and other significant air emissions by type and weight**



This indicator is particularly relevant to DONG Energy in relation to emissions from power and heat generation, and we report on the emissions that are deemed significant by authorities through licences, monitoring requirements, etc. We also include emissions of NO<sub>x</sub> and SO<sub>2</sub> from physical and chemical processes at other facilities and in administration buildings, including emissions from venting and burning of natural gas by flaring.

In addition to CO<sub>2</sub>, NO<sub>x</sub> and SO<sub>2</sub> constitute the most significant emissions. DONG Energy's Environmental Strategy includes targets to reduce such emissions. Emissions of NO<sub>x</sub> must be reduced by 90 per cent, and emissions of SO<sub>2</sub> must be reduced by 95 percent from 1990 to 2020. For additional information on this, see Environment.

Fugitive emissions, e.g. from coal storage facilities, are not included, as such emissions are considered to be less significant. Furthermore, emissions from transportation of products, materials and waste are not included. These are reported separately under EN29 – Environmental impacts of transporting products, materials and members of the workforce.

See Appendix: Emissions to air.

## **GRI:EN21 Total water discharge by quality and destination**



According to the GRI definition, water discharges comprise all discharges of water, planned as well as unplanned. Collected rainwater and domestic sewage are, however, not included. Discharges must be reported by destination and treatment method, as well as by standard effluent parameters such as Biological Oxygen Demand (BOD), suspended solids, etc.

DONG Energy discharges water at many locations and subject to many different requirements for measurement of effluent parameters. For this reason, it is not possible to provide a meaningful outline of water discharges at group level based on GRI's reporting requirements. Instead, we report our water discharges by destination from when the water leaves our premises, discharged either directly to the recipient, to the recipient after treatment by DONG Energy, discharged directly to treatment plants (not owned by DONG Energy), or to other treatment plants after treatment by DONG Energy.

Effluents discharged from DONG Energy's administration buildings in Denmark are considered to be and is of a quality similar to that of ordinary domestic waste water and is received by public treatment facilities. No overall figure for this is available, but the volume is presumed to equal the volume of water used in the administration buildings.

When we extract oil and gas from our offshore oil and gas fields, produced water containing oil is also drawn up from the subsoil. Most of the oil is separated from the produced water on the platform. The produced water, which still contains traces of oil, is then re-injected into the subsoil or discharged to the sea. Re-injection protects the marine environment, as the discharge of produced water, and hence the discharge of oil, to the sea is minimised. The average content of oil in produced water discharged to the sea does not exceed 30 mg oil per litre per month. The volume of produced water discharged is included in the reporting and is described further in the Annual Report page 29.

For information on water discharges, see Appendix: Water consumption and discharge.

## **GRI:EN22 Total weight of waste by type and disposal method**



Management, waste is calculated according to the method of disposal as either reuse, incineration or disposal by landfill. Waste is also classified as either hazardous or non-hazardous. The volume of waste is calculated for facilities and administration buildings.

The calculation of waste under this indicator only includes waste generated by DONG Energy, and waste treated at DONG Energy's waste incineration plants is therefore not included. Waste that has been treated is reported under EN1 and the amount of treated waste that is characterised as hazardous waste is also reported under EN24.

Waste is classified as either deriving from projects or from operations according to the classification applied to financial data.

Residual products from power and heat generation, such as ashes, slag and gypsum, are not included as waste. Information about these products, volumes and recycling rates are reported separately. See the table Production.

In 2007, targets were set to increase waste recycling towards 2012: We must recycle 65 per cent of the aggregate volume of waste from our facilities and 50 per cent of that from our administration buildings. The recycling of waste is therefore also reported from facilities and administration buildings respectively.

See Appendix: Waste.

#### **GRI:EN23 Total number and volume of significant spills**



This indicator is defined as the number and volume of significant spills resulting in substantial financial liabilities. DONG Energy uses a model to determine the gravity of environmental incidents based on the volume, spread and impact of the incident. The model may also be used to determine the potential impact of the incident. Our efforts to handle environmental incidents systematically may still be improved, but the model has given us a good overall picture of our most significant environmental incidents.

DONG Energy reports environmental incidents for the locations we own and operate. DONG Energy considers significant spills as an unwanted event that has an effective impact on the environment.

DONG Energy systematically records, acts on and follows up on unwanted events. We apply the principle that the degree of action is determined by the categorisation of the gravity of the incident. Such categorisation must be used to determine the scope of corrective and preventive action in relation to an incident.

For external reporting purposes, significant incidents are actual incidents which are defined as grave or alarming with an effective impact value of 25 or higher according to the model. Gas leaks resulting from excavation damage on natural gas distribution pipelines are also calculated. However, these are not rated as above, as they are accidents caused by a third party and can therefore only to a limited extent be prevented by DONG Energy. This is also the reason why gas leaks are calculated separately from other environmental incidents.

See Appendix: Transportation and other environmental aspects.

#### **GRI:EN24 Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally**



DONG Energy has performed a mapping of our handling of hazardous waste, including the transportation, import, export and treatment of our waste in Denmark. The mapping showed that all hazardous waste produced by DONG Energy is also transported to a primary treatment facility in Denmark at i.e. Stena Metall A/S.

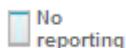
DONG Energy receives hazardous waste such as clinical waste from hospitals to be treated at our waste incineration plants. At two out of our six waste incineration plants, DONG Energy treats hazardous waste by incineration. The hazardous waste includes clinical risk waste, creosote-treated wood, ethanol solution and paint dust.

DONG Energy does not import waste, but residual products are exported from some locations.

For hazardous waste and exported residual products, see Appendix: Waste.

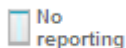


**GRI:EN25 Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organization's discharges of water and runoff**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:EN26 Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:EN27 Percentage of products sold and their packaging materials that are reclaimed by category**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:EN28 Monetary value of significant fines and total number of non-monetary sanctions for noncompliance with environmental laws and regulations**



Compliance with legislation is essential for any enterprise. Compliance with legislation is treated as a separate item in DONG Energy's QHSE policy.

Any non-compliance with legislation that results in substantial fines may be used as an indicator of the extent to which DONG Energy complies with legislation. In addition, DONG Energy wishes to perform measurements based on the number of complaints concerning our practices and our methods for complying with environmental laws and regulations under this indicator.

A substantial fine is defined as being more than DKK 50,000. The matter must be resolved to be included in the calculation. DONG Energy did not receive any substantial fines in 2009.

The reporting for 2009 also includes enjoining/injunctions, police reports and cases in judicial tribunal in relation to compliance with environmental laws and regulations. No cases have been brought before judicial tribunal and no police reports filed in 2009 in relation to compliance with environmental laws and regulations.

See Appendix: Transport and other environmental aspects.

**GRI:EN29 Significant environmental impacts of transporting products and other goods and materials used for the organization's operations, and transporting members of the workforce**



According to the GRI definition, environmental impacts of transportation include fuel consumption, emissions, discharges, waste, noise and spills and are calculated for transportation for logistical purposes and transportation of members of our workforce.

At DONG Energy, we assess the most significant environmental impacts of transportation to be the transport conditions on which we have a direct influence, either directly as owners or through leasing of transportation and transportation of members of our workforce. Transportation of materials, where DONG Energy only pays for the materials and has no influence on the method of transportation, is therefore not considered significant. This applies to e.g. delivery of coal and straw for the plants and delivery of consumer goods, such as paper articles and mail delivery and transportation of waste from DONG Energy's facilities.


In relation to transportation, only fuel consumption and CO2 emissions are reported, as these are assessed to be the most significant parameters.

Passenger transportation consists of many different elements, including transportation by taxi, train, air, privately owned cars and leased cars. Leased cars are predominantly used in connection with service technicians and repairmen's call-outs to customers. A number of company cars are also leased. In 2008, the response only included transportation in cars leased from Nordania Leasing, from which the majority of the cars are leased.

It is an ongoing process to evaluate whether other transportation aspects should be reported and how this can be done in a meaningful way.

See Appendix: Transport and other environmental aspects.

#### **GRI:EN30 Total environmental protection expenditures and investments by type**

 No reporting

This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

## Human rights

**GRI:HR1**      **Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening**



DONG Energy's significant investment projects are located in Northern Europe, where human rights compliance is secured through legislation and enforced through regulatory authorities. We have therefore assessed it to be unnecessary to have systematic procedures for such type of screening.

**GRI:HR2**      **Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken**



In 2009, DONG Energy continued "desk screening" of potential suppliers from a risk perspective. This is done even though our code of ethics applying to suppliers, including human rights compliance, are included in DONG Energy's contracts exceeding DKK 50,000. The "desk screening" has, among others, comprised potential coal suppliers and potential CDM-projects.

**GRI:HR3**      **Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained**



All purchasers at DONG Energy are familiar with DONG Energy's code of ethics applying to suppliers, including human rights compliance. The application of the requirements has been incorporated into relevant group and business procurement processes. In Group Procurement, the requirements are implemented as a standard document in connection with the signing of all contracts, and all buyers have reviewed the requirements. On commencement of their employment, all new employees are introduced to the requirements.

**GRI:HR4**      **"Total number of incidents of discrimination and actions taken."**



In 2009, we introduced a procedure for handling any incidents of discrimination. Incidents of discrimination must be reported to the executive management of the legal company referring the litigation to Group HR who is responsible for the compiling and handling of matters, if any.

No incidents of discrimination were reported for any DONG Energy company in 2009.

**GRI:HR5**      **Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk, and actions taken to support these rights**



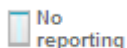
This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:HR6      Operations identified as having significant risk for incidents of child labour, and measures taken to contribute to the elimination of child labour**



No operations are assessed to have a significant risk of child labour. All of DONG Energy's employees are employed in Northern Europe on terms consistent with national legislation.

**GRI:HR7      Operations identified as having significant risk for incidents of forced or compulsory labour, and measures to contribute to the elimination of forced or compulsory labour**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:HR8      Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:HR9      Total number of incidents of violations involving rights of indigenous people and actions taken**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

## Labour practices

### GRI:EU14 Programs and processes to ensure the availability of a skilled workforce



#### Management training:

DONG Energy is strategically focusing on optimisation and development of the potentials of the integrated energy company – not least exploitation of the opportunities in the international market and the creation of a more sustainable energy production. It is therefore a requirement that our managers at all levels are increasingly prepared to deliver optimum performances across different cultures and business environments. Consequently, we have established a management academy, the objective of which is to strengthen the managers' strategic preparedness and personal leadership. We train our managers at three levels: top managers (EDP), experienced managers (LDP) and new managers (NMP). These are tailored management programmes and they each consist of three modules focusing on important subjects such as strategy, business understanding, management across the organisation, innovation, corporate responsibility and change management.

#### Project management:

We set high standards for project management at DONG Energy as we have a highly diversified project portfolio attracting particular public attention and many complex projects across national borders. To strengthen the competences of our project managers within financial management, value creation and the understanding of distance management, culture and values across the organisation, future and current project managers are given the opportunity to complete our internal project management course which is divided into four stages (PL1, PL2, PL3, and PL4).

#### Senior Seminar:

DONG Energy offers the Senior Seminar to all employees over the age of 55 and their partners. The employee must be based in Denmark.

The objective of the seminar is to provide inspiration for employees' mental preparation and financial planning for their lives as seniors.

The Senior Seminar is one of the offers included in DONG Energy's senior policy, the purpose of which is to provide employees with a good alternative to post-service salary or early retirement and to retain valuable knowledge in own company and strengthen DONG Energy's image as an attractive and responsible enterprise.

#### Subject-specific courses and safety courses:

We train our employees' subject-specific skills through subject-specific courses in the business areas, but today we have no consolidated data for this.

### GRI:EU15 Percentage of employees eligible to retire in the next 5 and 10 years broken down by job category and by region



In the segments Generation and Sales & Distribution, 17% of the workforce is 56 years of age or more and can therefore be expected to retire within a relatively short number of years.

### GRI:EU16 Policies and requirements regarding health and safety of employees and employees of contractors and subcontractors



DONG Energy interprets this indicator as follows:

Since suppliers and sub-suppliers of DONG Energy undertake high-risk activities, we must ensure that they are trained for work with relevant health and safety issues. Generally, there is a tendency for power companies to outsource the most dangerous assignments, for which reason it is important that employees as well as suppliers receive sufficient training to be able to perform these assignments.

Consolidated response based on information from S&D and Power.

S&D as well as Power comply with DONG Energy's OHSE policy which, among other things, prescribes that we must:

- motivate, train and engage employees in work with quality, occupational health and safety and the environment
- ensure compliance with legislation and that work is performed in compliance with recognized norms and standards

The result of this policy is, among other things, that QHSE is introduced to all in-house employees and that for instance all compulsory courses are completed. In addition, further specific training is provided when considered relevant.

#### **GRI:LA1 Total workforce by employment type, employment contract, and region**



See Appendix: LA1.

#### **GRI:EU17 Days worked by contractor and subcontractor employees involved in construction, operation & maintenance activities**



At DONG Energy, EU 17 is interpreted as follows:

DONG Energy uses many external suppliers and sub-suppliers. This may entail that knowledge and competences are not retained at DONG Energy and that critical business processes are dependent on external resources.

Consolidated response based on information from S&D and Power.

EU17 is relevant for two of DONG Energy's business areas:

- S&D
- Power

In the response, the number of suppliers and their employees who are critical to the reliability of supply and thus essential to the operation of the enterprise have been included for both business areas.

The number of suppliers who are critical to the reliability of supply and who operate within the field of construction, operation and maintenance in the two business areas are as follows:

- S&D: 15
- Power: 1,181

From these suppliers we have retained the following total number of employees:

- S&D: 883
- Power: 8,738

Other external suppliers and their employees, for instance suppliers providing products for the business areas or administrative consultants such as IT-employees and auditors, have not been included in the response as they are not considered essential to the critical business processes.

**GRI:EU18 Percentage of contractor and subcontractor employees that have undergone relevant health and safety training**



EU18 is interpreted as follows:

This indicator shows DONG Energy's ability to train external suppliers and sub-suppliers to ensure that safety and occupational health and safety measures are constantly applied when they work in certain high-risk areas. A detailed description of how real accidents involving suppliers are handled can be found in the GRI-indicator, LA7. To ensure that relevant training is provided, we want to analyse to which extent suppliers in the individual business areas receive occupational health and safety training in high-risk areas, as any accidents may entail major personal consequences for the employee involved and consequently also, indirectly, for society. We calculate the number of suppliers as well as the number of suppliers' employees receiving training.

Consolidated response based on information from all business areas.

All business areas have responded to EU18:

- E&P – Offshore suppliers, Siri platform, rigs (minus Mærsk Guardian and Ensco 102), and Mærsk Resolute
- Energy Market
- Power
- S&D
- S&D gas infrastructure
- Group staff

The response is, however, based on the fact that the indicator only addresses business areas producing energy, which means that the response has only focused on the following business areas at DONG Energy:

- Power
- S&D

It is important to DONG Energy to care for our suppliers to the extent that we care for our own employees, and for this reason these two business areas provide thorough training for their own employees as well as for suppliers and their employees who are in charge of work functions to be considered high-risk areas. This category comprises for instance offshore work (wind turbines), construction work, high-voltage work, hot work, etc.

Both business areas train all employees and the suppliers' employees who work in the above-mentioned categories. This means that.

- Power trains all suppliers and their employees = 1,181 suppliers/8,738 employees
- S&D trains all suppliers and their employees = 15 suppliers/483 employees

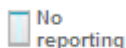
DONG Energy considers these suppliers important to ensure a reliable energy supply, and it is essential that they receive structured training in respect of health and safety to minimise the risk of accidents occurring. For this reason, in the response focus is on this aspect pertaining to suppliers. Responses from Power and S&D have been attached as well as extracts from Hyperion's response.

**GRI:LA2 Total number and rate of employee turnover by age group, gender, and region**



See Appendix: LA2

**GRI:LA3 Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:LA4 Percentage of employees covered by collective bargaining agreements**



See Appendix: LA4.

**GRI:LA5 Minimum notice period(s) regarding operational changes, including whether it is specified in collective agreements**



DONG Energy complies with Danish and EU law, including the cooperation agreement between the Confederation of Danish Employers (DA) and the Danish Confederation of Trade Unions (LO) and the Danish Act on Collective Dismissals, respectively. In addition, DONG Energy has drafted a standard severance agreement.

**GRI:LA6 Percentage of total workforce represented in formal joint management–worker health and safety committees that help monitor and advise on occupational health and safety programs**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:LA7 Rates of injury, occupational diseases, lost days, and absenteeism, and number of work related fatalities by region**



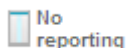
See Appendix: LA7.

**GRI:LA8 Education, training, counselling, prevention, and risk-control programs in place to assist workforce members, their families, or community members regarding serious diseases**



See Appendix: LA8.

**GRI:LA9 Health and safety topics covered in formal agreements with trade unions**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.



**GRI:LA10 Average hours of training per year per employee by employee category**



Hours of training are not recorded in all divisions of DONG Energy. The direct costs of training for the Danish part of the organisation amounted to approximately DKK 84,000,000 in 2009. The costs have primarily been calculated on the basis of the costs of training of DONG Energy recognised in our books. In addition, much of the training consists of peer training, where experienced employees train colleagues. Such training is not priced.

**GRI:LA11 Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:LA12 Percentage of employees receiving regular performance and career development reviews**



Dong Energy aims to offer all employees performance reviews, at which goals and development plans are evaluated and determined, respectively. The purpose of such performance reviews is to create a strong link between DONG Energy's business strategy and our employees' goals, efforts, career and development. We have no documentation indicating the number of employees having participated in performance reviews in 2009, but we expect the number to be nearly equal to the number in 2008, i.e. around 80%. In 2010, we will again conduct a questionnaire survey among all employees, and in this context we will ask questions about the performance reviews carried out in the past year.

**GRI:LA13 Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity**



See Appendix: LA13

**GRI:LA14 Ratio of basic salary of men to women by employee category**



In order to document that DONG Energy pays equal pay to men and women, it is necessary to have data categorising all employees according to specific job categories. Only a comparison of men and women within the same job categories will make it possible to determine whether DONG Energy pays equal pay to men and women. Currently, no such job categorisation has been made at DONG Energy, and it is therefore not possible to report on this indicator.

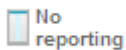
## Society

### **GRI:EU19 Stakeholder participation in the decision making process related to energy planning and infrastructure development**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

### **GRI:EU20 Approach to managing the impacts of displacement**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

### **GRI:EU21 Contingency planning measures, disaster/emergency management plan and training programs, and recovery/restoration plans**



The DONG Energy group emergency policy is intended to support and coordinate DONG Energy efforts to respond to an emergency, regarding personal incidents, terrorist threats, serious incidents at plant and buildings, as well as natural disasters, war and epidemic situations and strikes. Events like the Climate conference, COP15, is classified as high risks for DONG Energy, and together with incidents at our exploration and production platforms, are identified as situations with the highest emergency risks.

Together with business units local emergency response organizations, the group emergency response organization are responsible to maintain and implement emergency response plans and manuals. Together the group emergency manual and the local emergency plans cover the operational procedures and communicative guidelines for DONG Energy, and thereby ensure compliance with contingency planning legislation.

Emergency situations are wholly dependent on how well the personal are prepared in handling an emergency situation. Success in handling the situation is best accomplished through proper organization, through planning and training. Training exercises are carried out at all levels in DONG Energy, from fire exercises in administrative buildings, to evacuation from an oil producing platform in the Nord Sea to an exercise where a Power Plant is taken over by demonstrators.

In Denmark, DONG Energy must comply with contingency planning legislation, under which the individual locations are required to have individual contingency plans, as prescribed by the municipal contingency planning officer. Several of DONG Energy assets are under special legislation, and are audited by Energinet.dk on a regular basis. Off-shore platforms are subject to special contingency planning requirements laid down by the Danish Energy Agency, which also supervises the plans.

### **GRI:S01 Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting**



This year, it has not been possible to provide a response to the indicator as there are no procedures or systems in place for the compilation of this information.

**GRI:EU22**      **Number of people physically or economically displaced and compensation, broken down by type of project**



This indicator has been evaluated as not material for DONG Energy. See detailed information about this materiality evaluation under GRI:3.5.

**GRI:S02**      **Percentage and total number of business units analyzed for risks related to corruption**



2009 focused on implementing the policy and attracting more attention to risks, including "health checks" with regular information posted on DONG Energy's intranet.

As part of the follow-up on DONG Energy's policy for the prevention of fraud and corruption, an external consultancy firm (Septia Group) reviewed a number of vouchers in 2009. The purpose thereof was to conduct a "health check", and the investigation took place in the form of random checks from 1 January 2007 to 31 March 2009 carried out at selected business areas based on risk aversion. The investigation focused on external suppliers as well as executives at DONG Energy. The final conclusions and recommendations set out in the report will be presented at the beginning of 2010. Any measures required will then be initiated.

**GRI:S03**      **Percentage of employees trained in organization's anti-corruption policies and procedures**



Since the introduction of e-learning and until 31 December 2009, 290 executives and 609 non-executives completed DONG Energy's e-learning program for the prevention of fraud and corruption, corresponding to 55% and 13% respectively. In this survey, employees were for instance asked what in their opinion are the three areas most exposed to fraud in their business area and what the likelihood is for fraud to take place. Most employees responded that the risk areas are 1) the supplier charging too high a price, 2) information abuse or information theft, 3) abuse of the giving and receiving of in-kind contributions.

**GRI:S04**      **Actions taken in response to incidents of corruption**



In connection with the implementation of DONG Energy's policy for good business ethics, a Business Ethics Committee was established in 2008, which has the overall responsibility for the correct handling of cases of fraud and corruption. All significant matters, for instance cases of alleged corruption, are handled by the committee, while less significant cases are handled locally at business area level. The committee will, however, to a wide extent receive information on cases handled locally.

In 2009, the committee looked into one case and found no reason to continue the investigation.

**GRI:S05**      **Public policy positions and participation in public policy development and lobbying**

In relation to public policies of relevance to the energy sector, it is DONG Energy's opinion that market-based solutions to societal challenges such as climate change and security of supply must be found. For this reason, we support among other things efforts to further liberalise the European energy sector. It is also our aim to establish long-term relations with our stakeholders based on trust. In relation to these goals, our work with the framework conditions for the energy sector is rooted in our Regulation Committee, and the daily responsibility for such work is undertaken by Group R&D. DONG Energy is a member of a number of forums and organisations seeking to provide input to the development of new public policies.

These are for instance industry organisations such as the Danish Energy Association, Waste Denmark, the Confederation of Danish Industry (DI) and the European wind energy network European Wind Energy Association

(EWEA). Below is a list of our key memberships of organisations, etc. that indirectly assist in the development of public policies. Throughout 2009, DONG Energy participated in various climate-related conferences and forums, the purpose of which was to focus on the negative consequences of climate change and to call for politicians to sign a more ambitious climate agreement in Copenhagen. Some of the most important conferences and forums were:

- Climate Change: Global Risks, Challenges & Decisions
- Copenhagen Climate Council
- World Business Summit on Climate Change
- Nordic Climate Solutions 2009
- The Project Syndicate conference “From Kyoto to Copenhagen”

In connection with COP15, DONG Energy called for politicians to sign an ambitious, long-term climate agreement leading to a high price on CO<sub>2</sub>, which would stimulate the development of renewable energy.

DONG Energy was an official partner of COP15.

#### **Memberships:**

##### **In Denmark:**

- The Danish Energy Association
- The Confederation of Danish Industry, Danish Energy Industry Federation
- Danish Wind Industry Federation
- Waste Denmark
- Danish District Heating Association
- Danish Wind Turbine Owners’ Association
- The Energy and Oil Forum (previously Danish Petroleum Industry Association)
- Danish Gas Association

##### **Internationally:**

- Copenhagen Climate Council
- Business Social Responsibility
- Eurelectric
- Eurogas
- The European Wind Energy Association (EWEA)
- Svenska Gasförening (the Swedish gas association)
- The World Business Council for Sustainable Development

#### **GRI:S06 Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country**



It is DONG Energy’s policy not to give any financial or in-kind contributions to political parties, trade unions or candidates.

Employees must report all in-kind contributions, etc.

We are not aware of any financial or other in-kind contributions having been given to political parties, politicians or organisations.

#### **GRI:S07 Total number of legal actions for anticompetitive behavior, anti-trust, and monopoly practices and their outcomes**



In 2009, five cases involving competition-law aspects were pending – one arbitration case, one case before the Danish Competition Council and three cases before the Maritime and Commercial Court in Copenhagen. The arbitration case concerns DONG Energy’s agreement on acquisition of natural gas from the Syd Arne platform.

The case before the competition authorities concerns the question whether the former company Energi E2 abused its dominant position in the Eastern Danish wholesale electricity market during the last six months of 2003 up to and including 2005. The case is expected to be heard by the Danish Competition Council in the first quarter 2010.

The other cases concern the question of the alleged abuse by Elsam of its dominant position in the Western Danish wholesale electricity market. Two out of three cases have been brought before the Maritime and Commercial Court in Copenhagen by DONG Energy against the Danish Competition Council, as DONG Energy does not agree on the decisions of the council that the former power company, Elsam, violated the competition legislation during the period from the last six months of 2003 up to and including the first six months of 2006. The last case heard by the ordinary law courts concerns a claim for damages resulting from the alleged abuse of dominant position in the aforementioned period.

None of the three cases before the ordinary law courts were closed in 2009.

**GRI:S08      Monetary value of significant fines and total number of non-monetary sanctions for noncompliance with laws and regulations**



In 2009, neither DONG Energy nor its employees in their capacities as DONG Energy employees received any significant fines. Nor has any non-monetary criminal-law sanctions for non-compliance with laws and regulations been imposed on the DONG Energy group.

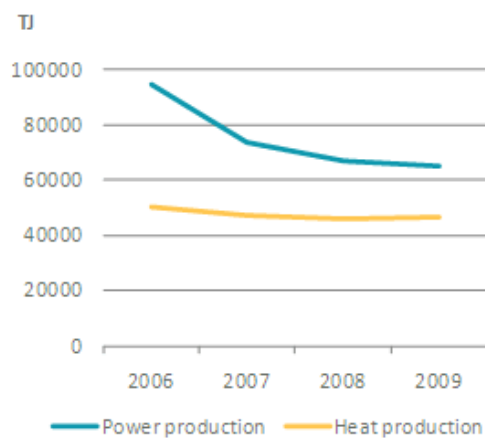
## Appendix

### 9.1 Production

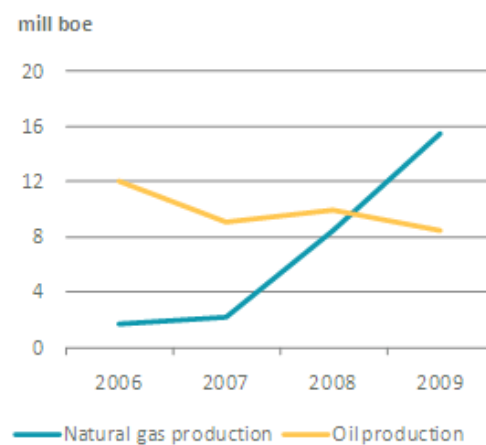
Data for production						
	Enhed	Metode	2009	2008	2007	2006
<b>Production</b>						
Power generation	GWh	m	<b>18,074</b>	18,536	20,534	26,278
Heat generation	TJ	m	<b>46,686</b>	46,380	47,257	50,508
Natural gas production	mio. BOE	m	<b>15.5</b>	8.5	2.2	1.7
Oil production	mio. BOE	m	<b>8.5</b>	10.0	9.1	12.1

A line in the table illustrates that comparable data are not available due to missing, incomplete or different inventories. M = Measured, C=Calculated, E=Estimated

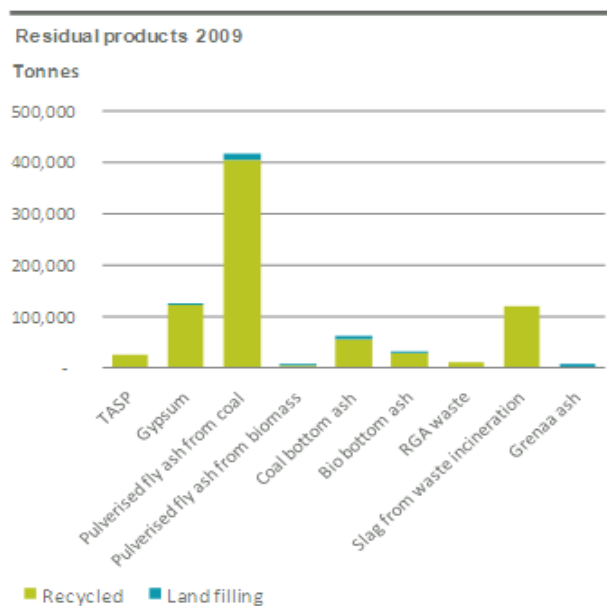
Energy production



Energy production



Besides the primary production types that can be seen in the table and the graphs above DONG Energy also produces a large amount of residual products in the power stations. A large proportion of the residual products are recycled, whereas a minor proportion is staken to landfills. The below shows the recycled amounts and the amounts taken to landfills for each of the residual products.



## Compilation method

Production comprises the volume of energy that is delivered by the production assets in which DONG Energy has an ownership interest. The production has been included in relation to its legally owned pro rata share for joint ventures.

Generation of power has largely been calculated as net generation sold based on settlements from the official Danish production database, Panda. Data on production from foreign, non-operated renewable energy facilities are provided by the operators.

Heat production is compiled as the net production that is sold. Heat generation from renewable energy stations is based on the monthly heat withdrawals from geothermal water. The Magrethelholmen geothermal plant is not included. DONG Energy will receive a financial share regardless of the production and does not receive production data.

For the hydropower plant Indalselven, the ownership interest has been converted to an annual right of withdrawal from the plant, and the reporting is consequently based on the annual withdrawals and not on total production based on ownership interest.

Natural gas and oil production have been based on meter readings on delivery to shore.

The production figures for oil and natural gas for 2007 and 2006 have been changed to correspond to the figures stated in the financial reports using the same consolidation rules as were used in 2008. The change has been made to facilitate comparison across the years.

Residual products comprise the annual amount of products produced and is calculated using plant specific calculation methods.

## Explanation of development

In 2009 the total production of natural gas and oil was 24,0 mill. boe compared to 18,5 mill. boe in 2008. The natural gas production constituted 15,0 mill. boe compared to 8,5 mill. boe in 2008 and hereby natural gas production surpassed the oil production for the first time. This corresponds with DONG Energy's strategy for ensuring security of supply by increased natural gas supply.

The natural gas production come from Ormen Lange (61 %), the new field Alve (5 %), the mature fields Ula, Gyde and Tambar in Norway as well as Syd Arne, Siri/Stine, Nine and Cecilie in Denmark (19 %). 81 % of the total natural gas and oil production came from Norway compared to 69 % in 2008. The increased production is primary due to the production at Ormen Lange. Production from the Danish fields was on the contrary 22 % lower than the previous year.

## 9.2 Distribution, interruption and grid loss

Distribution, interruptions and distribution losses					
	Unit	Method	2009	2008	2007
<b>Distribution</b>					
<b>Distribution</b>					
Length of transmission net (sold)	km	m	-	-	646
<b>Length of power distribution net</b>					
50 kV /30 kV	km	m	792	785	735
10 kV	km	m	6,714	6,677	6,464
0,4 kV	km	m	11,649	11,635	11,362
<b>Infrastructure in the power distribution net</b>					
Main power stations 50/10 kV and 30/10 kV	no.	m	93	93	-
10/0,4kV transformer station	no.	m	9,862	9,819	-
10 kV cabling stations	no.	m	145	148	-
Cable boxes and cupboards	no.	m	116,698	113,483	-
<b>Interruptions</b>					
System Average Interruption Frequency Index (SAIFI)	number	m/c	0.34	0.45	-
System Average Interruption Duration Index (SAIDI)	min	m/c	17.0	26.2	-
<b>Distribution losses</b>					
Distribution loss	%	c	4	4	4
A line in the table illustrates that comparable data are not available due to missing, incomplete or different inventories.			M = Measured, C=Calculated, E=Estimated		

### Compilation method

#### Length of power transmission and distributions network

Length of power transmission and distribution network calculated 31/12-2009.

#### Interruptions without prior notice

The frequency and duration of interruptions for customers without prior notice in a power system are expressed in the form of SAIFI (System Average Interruption Frequency Index), which is the average number of interruptions per customer per year, and SAIDI (System Average Interruption Duration Index), which is the average duration of interruptions per customer per year.

#### Distribution network loss

The grid loss of the distribution networks is calculated as gross deliveries divided by net deliveries. No distinction is made between technical and non-technical losses in this connection.

#### Length of power transmission and distribution network

DONG Energy's power distribution network area covers Copenhagen, Frederiksberg and North Zealand and is owned by the companies DONG Energy City Elnet A/S, DONG Energy Frederiksberg Elnet A/S and DONG Energy Nord Elnet A/S. The distribution network consists of overhead power lines, underground cables, and transformer stations, while the transmission network consists of overhead power cables only. The three distribution networks are not at the exclusive disposal of DONG Energy in that other power suppliers also can purchase access to them.



## **Explanation of development**

The frequency and duration of interruptions without prior notice have both fallen significantly (about 25 %) in 2009. Interruptions without prior notice are to a large extent characterised by coincidences and external incidents, i.e. the activity level in society. There is however also a decreasing tendency in the indexes due to improvements of the grid.

## 9.3 Customers and sales

<b>Power</b>	Unit	Method	2009	2008	2007
Number of customers					
Denmark	number	Number of points of use	907,631	942,704	901,014
- residential customers	number		785,377	814,225	777,329
- industrial and commercial customers	number		122,254	128,479	123,685
The Netherlands (residential)	number	Power grid connections	39,000	38,647	41,000
The Netherlands (commercial)	number	Power grid connections	5,000	-	-
Germany (residential customers)	number	Number of end-customers based on wholesale	-	-	140,000
Quantity sold	GWh		10,723	10,853	10,893
<b>Natural gas</b>					
Number of customers, total		Number of points of use			
Denmark			122,487	124,209	120,896
- residential customers	number		109,103	108,141	105,892
- industrial and commercial customers	number		13,384	16,068	15,004
The Netherlands (residential)	number	Power grid connections	101,000	108,533	125,000
Germany (residential customers)	number	number of end-customers based	-	-	60,000
The Netherlands (commercial and industrial customers)	number		10,000	6,429	-
Sweden (wholesale and industrial customers)	number		426	515	262
Quantity sold	GWh		93,961	99,413	78,820
<b>Energy-efficient products</b>					
Green electricity sold	GWh		418,396	-	-
Solar cell power sold	MWh		430	-	-
Eliminated CO <sub>2</sub>	number		3,054	-	-
Biogas sold	Nm <sup>3</sup>		0	-	-
<b>Energy savings for customers</b>	MWh		145,100	182,900	166,889
- residential customers	MWh		54,000	94,300	60,713
- industrial and commercial customers*	MWh		83,800	88,600	106,176
- institutional customers*	MWh		7,300	-	-

\* As of 2009, a separate report on institutional customers will be issued. Previously, they were included in the report under "Industrial and commercial customers".

### Calculation method

#### Number of customers

DONE Energy has end-customers in Denmark, the Netherlands and Sweden. In Denmark and the Netherlands, we sell both power and gas direct to end-customers, whereas in the Swedish subsidiaries we only have sales to wholesale and major customers.

In Denmark, power and gas customers are calculated as the number of points of use. In Sweden, the number of customers is calculated as business-to-business customers, i.e. wholesale and industrial customers. In the Netherlands, the number of customers in 2009 is calculated as the number of power grid connections. In previous years, the number of power and gas customers in the Netherlands has been based on an estimate.

As the customers in Germany form part of an associate company, they have not been included in the 2009 reporting.

### **Energy-efficient products**

Dong Energy offers the products for renewable energy included in the table above, which have not been reported under the DSM agreement. Projecting/installation of solar cell plants and solar heating systems. Sale of green power and elimination of CO2 quotas. In addition, Dong Energy is working on a project for upgrading biogas for the natural gas network.

### **Energy savings for customers**

DONG Energy makes systematic efforts to create energy savings for its customers. Based on a 2005 agreement concluded with the Danish government, we must achieve savings for our customers equivalent to 144 GWh per year for the period 2006-2009, and we expect to achieve savings equivalent to 308 GWh from 2010-2013 in compliance with a new energy savings agreement concluded at the end of 2009. We offer energy advice to owners of public buildings, institutions and businesses, including residential programmes.

### **The residential segment**

In the residential segment, activities primarily constitute information and sales campaigns.

The information campaigns, including Energy Forum Denmark, help customers save energy and instead consume energy where it makes the most sense. They promote the use of for instance power saver plug banks, low-energy light bulbs, lower washing temperatures, etc. The sales campaigns offer customers energy friendly solutions including heat pumps, windows, insulation, etc. In 2009, Dong Energy put into operation a new business area, Cleantech, the objective of which is to sell energy friendly solutions to the residential market.

The choice of method and evaluation is in compliance with the Danish Energy Authority's requirements for quality assurance and audit.

### Major commercial customers

We primarily offer individual energy advice to our major business customers (industrial and commercial). The implementation of energy savings in the business segment takes place through partnerships, individual advice, including replacement of energy-technological plants, campaigns, for instance aimed at server rooms, and strategic cooperation with customers and advisers.

The choice of method and evaluation is in compliance with the Danish Energy Authority's requirements for quality assurance and audit.

## 9.4 Capacity, availability and production efficiency

Capacity, availability factor and production efficiency				
	Unit	Method	2009	2008
<b>Capacity</b>				
<b>Installed power capacity</b>				
Thermal	MW	m/c	5,662	5,619
Off-shore wind	MW	m/c	749	361
Onshore wind	MW	m/c	355	245
Hydro	MW	m/c	205	205
<b>Installed heat capacity</b>				
Thermal	MJ/s	m/c	4,081	3,944
Geothermal	MJ/s	m/c	7	7
<b>Availability factor</b>				
Average availability factor (Central power plants)	%	m/c	93	96
Power availability for windturbins	%	m/c	94	93
<b>Production efficiency</b>				
Average production efficiency - Total for power plants	%	m/c	62	61
Average production efficiency - Central power plants	%	m/c	59	58
Average production efficiency - Decentral power plants	%	m/c	81	82
A line in the table illustrates that comparable data are not available due to missing, incomplete or different inventories.			M = Measured, C=Calculated, E=Estimated	

### Compilation method

#### Capacity

DONG Energy's thermal capacity is made up of central and de-central power stations and waste combustion plants, all of which are located in Denmark.

The renewable capacity consists of onshore and offshore wind farms, interests in hydropower plants and geothermal plants. The capacity is included in relation to the legal ownership interest regarding companies with joint management.

#### Energy availability

DONG Energy calculates energy availability as the period of time during which a plant delivers its nominal capacity. The remainder of the time is spent on either planned or unplanned shutdowns - audits or breakdowns, respectively.

The calculation of energy availability is an average based on data recorded during the period January 2009 to November 2009. The calculation is only performed for central power stations.

#### Production efficiency

Production efficiency is calculated as total efficiency for power and heat generation at the central power stations. Efficiency is calculated as the ratio of power and heat generated and the energy content of the consumed fuels.

The waste combustion plants are included in the efficiency for de-central power stations in the table above.

#### Explanation of development

Offshore wind capacity has increased to the double in 2009, which mainly is due to the fact that the Horns Rev 2 wind farm is now in operation with a capacity of 209 MW and also a number of projects under construction with a capacity

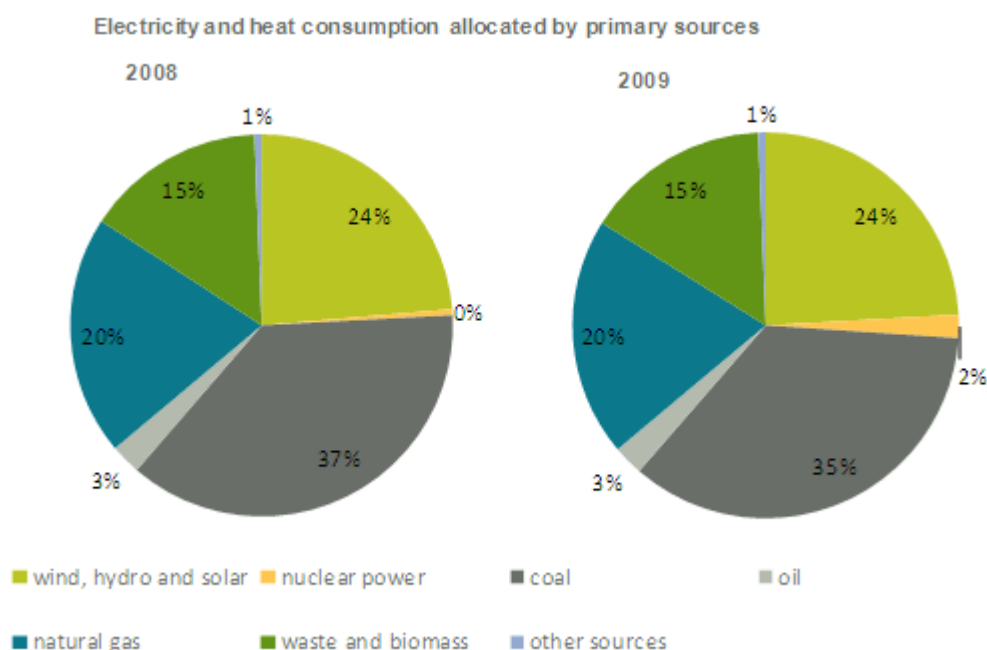
increase of 173 MW. Onshore wind capacity has increased by 40 % mainly due to the accession of Storrund and Nygaardfjell 1 with 27 MW as well as 81 MW capacity at projects in Poland.

## 9.5 Materials and energy consumption

Data for materials and energy consumption			2009	2008	2007	2006
	Unit	Method				
<b>Consumption</b>						
<b>Consumption of raw materials</b>						
Coal	tonnes	m	<b>4,018,880</b>	4,388,756	4,912,195	6,179,082
Oil	tonnes	m	<b>232,040</b>	209,215	239,014	333,344
Natural gas	Nm <sup>3</sup>	m	<b>845,863,170</b>	864,950,594	809,478,301	1,119,662,968
- of which flaring	Nm <sup>3</sup>	m	<b>7,335,143</b>	8,622,958	9,681,220	8,403,931
- of which venting	Nm <sup>3</sup>	m	<b>36,403</b>	46,523	-	-
Biomass incl. bio oil and wood	tonnes	m	<b>1,279,272</b>	1,249,306	1,535,986	1,387,877
Waste	tonnes	m	<b>638,481</b>	635,477	678,150	780,065
<b>Energy consumption (electricity and heat)</b>						
Electricity consumption	MWh	m	<b>23,728</b>	34,224	1,193,092	1,709,166
Heat consumption	GJ	m	<b>53,868</b>	50,409	224,590	277,646
Electricity consumption	MWh	m	<b>109,354</b>	98,627	143,870	163,639
Heat consumption	GJ	m	<b>109,241</b>	119,113	36,324	47,012

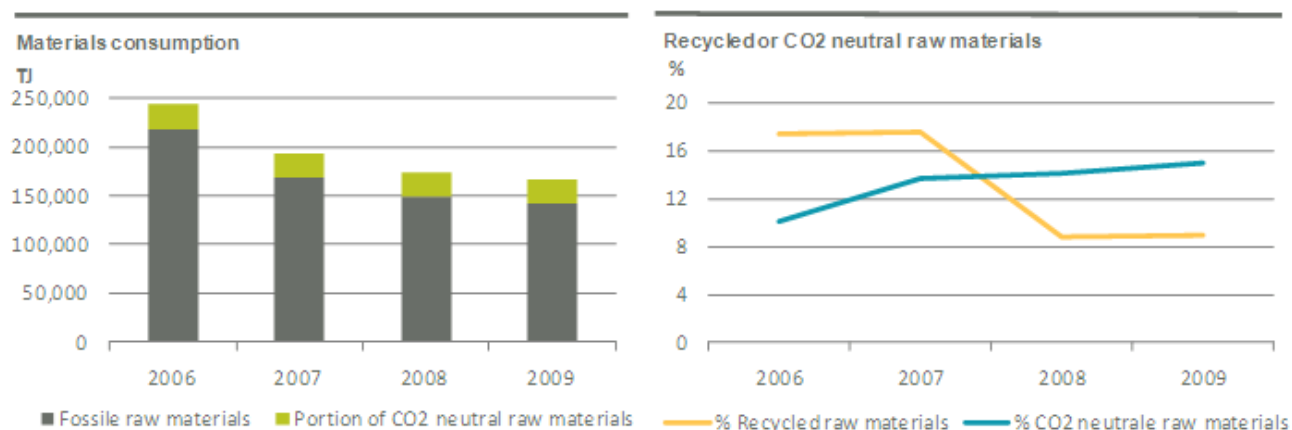
A line in the table illustrates that comparable data are not available due to missing, incomplete or different inventories. M = Measured, C=Calculated, E=Estimated

The graph below shows the allocation of power and heat consumption on DONG Energy's facilities and administrations by primary sources. Only consumption on facilities that do not produce power and/or heat is allocated by primary sources as consumption of primary fuels for power and heat production is included in the direct consumption of raw materials as seen in the table above.



In an environmental perspective it is relevant how the distribution between fossil and renewable energy sources is and hereby also the focus in a sustainable energy consumption. Fossil energy consumption is compiled as the sum of coal, oil and natural gas consumption, while the CO<sub>2</sub> neutral energy sources are compiled of waste and biomass which is used in the power stations. This can be seen in the graph below.

Incineration of waste is generally not considered reuse in reference to the Danish Executive Order on Waste. However, as waste incineration generates energy which has first priority in the power grid, it replaces a potential use of other types of fuels i.e. coal, oil and natural gas. The proportion of reused raw materials (i.e. waste) can be seen in the graph below where the proportion of CO<sub>2</sub> neutral fuels compared to total fuel use also can be seen.



## Compilation method

### Consumption of raw materials

As a main rule, consumption is defined as the fired volume. Some facilities calculate biomass and waste as materials supplied to the plant. The calculation principles for the power stations have been approved by the Danish tax authorities and hereby cover most of the consumption.

For oil and gas production, the consumption of raw materials is calculated either as the fired volume of natural gas, the amount of diesel oil supplied to a platform or the amount of natural gas flaring measured ultrasonically.

For gas distribution, the consumption of natural gas is calculated based on meter readings. With respect to gas flaring, the volumes are calculated based on pressure and the dimension of the emptied process plant.

For consumption related to administration and other processes, DONG Energy calculates the direct consumption on the basis of settlements.

The amount of renewable energy sources is calculated as the share of fuels fired in heat and power generation plants considered to be CO<sub>2</sub>-neutral. This includes biomass and waste considered to be CO<sub>2</sub>-neutral under the Danish CO<sub>2</sub> Allowances Act.

The volume of recycled raw materials has been calculated as the sum of waste. For 2006 and 2007, landfill gas consumed as raw material has also been calculated based on weight in relation to the total consumption of raw materials.

The total consumption of fossil raw materials is calculated as the sum of coal, oil and natural gas consumption based on energy.

### Energy consumption

The consumption of energy (power and heat) at power stations is calculated based on technical readings.

The consumption of electricity at the power distribution operations is calculated based on the Danish public meter reading system, Elvis, at the facilities where meters are installed. For meter and regulator stations in the gas distribution network, a very loose estimate is provided.

For the remainder of the DONG Energy Group, the direct consumption is calculated based on settlements.

To illustrate what power and heat consumption entails in terms of usage of primary energy sources incl. renewable sources the consumption is recalculated into these sources based on knowledge of the composition of the power and heat in the regions where DONG Energy has activities. The recalculation into primary sources is only done for administrations and facilities which do not produce power and heat, as the resource usage for power and heat production is included in the direct usage of raw materials.

For recalculating power consumption in Denmark into primary sources the electricity declarations for east and west Denmark from the Danish Energy Agency is used to calculate the electricity consumption at plants and administration premises distributed by sources. As the electricity declaration for 2009 from the Danish Energy Agency had not been published before this reporting, the declarations from 2008 will be applied. This shift also applies to prior years. If there is a specific electricity supply for a facility, a specific declaration suitable for this facility will be used; for instance facilities using Natural Power ("Naturstrøm") primarily derived from wind energy.

For recalculation of heat consumption at facilities and administration as well as power consumption at facilities outside Denmark, the 2007 statistics from the International Energy Agency (IEA) will be applied.

### **Auxiliary materials and chemicals**

The consumption of auxiliary materials has not been calculated for 2008 as the consumption of chemicals is under revision and is not yet included in the Groups reporting of responsibility data.

### **Explanation of development**

The increase in oil consumption is due to technical and economic conditions in relation to the operation of the power stations. Many start-ups and for example break down of coal mills increases the oil consumption. The biggest changes is due to two power station blocks that in 2009 have used oil instead of coal and natural gas which was used previously.

The venting of natural gas has fallen 22 % mainly due to an error in the compilation for 2008, where multiple excavation damages were incorrectly reported as venting. These data are otherwise reported under Transport and other environmental aspects.

For power stations the power and heat consumption is increased by 23 % and 14 % respectively in 2009 compared to 2008. The changes are due to a number of differences in consumption on the individual power stations both reductions and increases and can't be explained further.

For administrations and other facilities the power consumption has increased by 11 % mainly due to a improved compilation of consumption in the power distribution grid.

## 9.6 Emissions to air

### Data for emissions to air

	Unit	Method	2009	2008	2007	2006
Carbon dioxide (CO <sub>2</sub> ), direct emission	mill. tonnes CO <sub>2</sub> eqvt.	m/c	12.0	12.7	14.0	18.2
- of which verified CO <sub>2</sub> subject to quotas	mill. tonnes CO <sub>2</sub> eqvt.	m/c	11.9	12.6	13.8	18.0
Carbon dioxide (CO <sub>2</sub> ), indirect emission by purchase of electricity and heat	tonnes CO <sub>2</sub> eqvt.	c	48,412	54,923	77,670	-
Methane (CH <sub>4</sub> )	tonnes CO <sub>2</sub> eqvt.	c	50,059	61,796	68,718	66,177
Non methane volatile organic compounds (NMVOC)	tonnes CO <sub>2</sub> eqvt.	c	8,270	26,469	19,388	13,650
Nitrous oxide (N <sub>2</sub> O)	tonnes CO <sub>2</sub> eqvt.	c	46,956	73,262	54,359	68,949
Sulphur hexafluoride (SF <sub>6</sub> )	tonnes CO <sub>2</sub> eqvt.	c	160	616	1,465	422
Carbon Monoxide (CO)	tonnes CO <sub>2</sub> eqvt.	c	5,810	5,664	4,630	5,745
Specific emission of CO <sub>2</sub> for DONG Energy excl. E&P (85/15)	g CO <sub>2</sub> /MWh	m/c	574	590	613	638
Nitrogen oxide (NO <sub>x</sub> )	tonnes	m/c	9,304	11,650	17,006	25,352
Sulphur dioxide (SO <sub>2</sub> )	tonnes	m/c	2,425	3,507	4,199	6,629

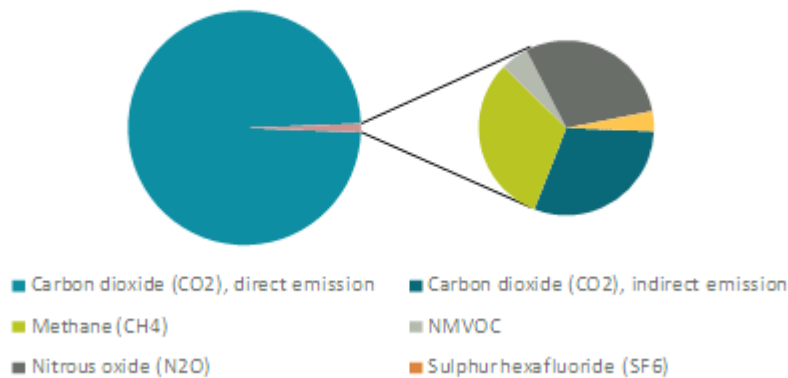
### The CO<sub>2</sub> campaign "1 tonne less per employee in 2012"

Total reductions in emissions from projects by end of 2009	ton CO <sub>2</sub> saved	m	2,895	nyt mål	nyt mål	nyt mål
Total energy savings from projects by end of 2009	GJ	m	74,891	nyt mål	nyt mål	nyt mål
- of which savings in power consumptions	MWh	m	4,338	nyt mål	nyt mål	nyt mål
- of which savings in heat consumptions	GJ	m	15,412	nyt mål	nyt mål	nyt mål
- of which savings in natural gas consumptions	Nm <sup>3</sup>	m	5,471	nyt mål	nyt mål	nyt mål
CO <sub>2</sub> -reduction per employee	ton CO <sub>2</sub> saved per employee	m	0.49	nyt mål	nyt mål	nyt mål

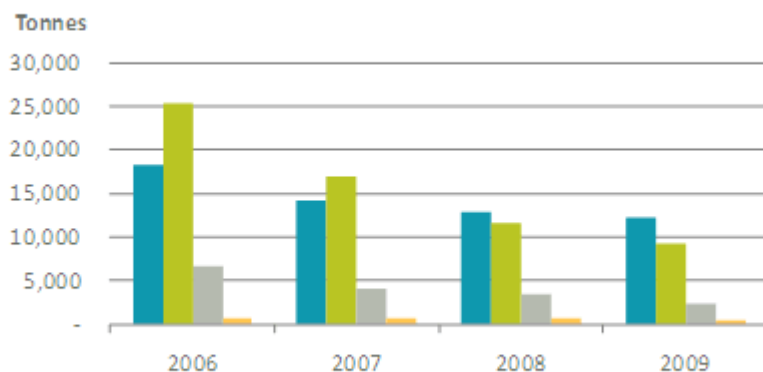
A line in the table illustrates that comparable data are not available due to missing, incomplete or different inventories.

M = Measured, C=Calculated, E=Estimated

Emission of greenhouse gases in tonnes, 2009



Air emissions



■ CO<sub>2</sub>eqvt in 1000 tonnes ■ NO<sub>x</sub> ■ SO<sub>2</sub> ■ Trace elements etc. from Power stations



## Compilation method

### Carbon dioxide CO<sub>2</sub> – CO<sub>2</sub> emissions subject to allowances

CO<sub>2</sub> emissions are calculated for facilities that are subject to CO<sub>2</sub> allowances and for which DONG Energy has the operator ownership in accordance with the approved surveillance plans.

### Carbon dioxide CO<sub>2</sub> - emissions not subject to allowances

CO<sub>2</sub> emissions not subject to allowances from processes at offshore oil and gas production plants, distribution of power and gas etc., are calculated using sector-specific emission factors from OGP (1995) or plant-specific emission factors. Data is based on the consumption of natural gas and oil products.

Emissions from own produced power and heat consumption is not included in the total, direct CO<sub>2</sub> emissions. CO<sub>2</sub> emissions from power and heat consumption are reported separately as indirect emissions.

CO<sub>2</sub> emissions from power consumption are calculated for Danish facilities using the electricity declarations from the Danish Energy Agency for east and west Denmark respectively. As the electricity declaration for 2009 from the Danish Energy Agency had not been published before this reporting, the declarations from 2008 will be applied. This shift is also applied for the prior years. If there is a specific electricity source for a facility, a specific declaration corresponding to this facility will be used; for instance facilities using Natural Power exclusively derived from wind energy.

The CO<sub>2</sub> emission from heat consumption for Danish facilities is calculated using the Danish Energy Agency's standard factor for emission from heat which is 34 g/kWh. As the electricity declaration for 2009 from the Danish Energy Agency had not been published before this reporting, the declarations from 2008 will be applied. This shift is also applied for the prior years.

For locations outside Denmark country specific emission factors from IEAs report on CO<sub>2</sub> emissions from fuel consumption 2009 is used.

### Nitrogen oxides NO<sub>x</sub> and sulphur oxide SO<sub>2</sub>

For the power stations, emissions are mainly calculated on the basis of continuous measurements. A few power stations use plant-specific emission factors to calculate emissions.

Nitrogen oxide emissions and sulphur oxide emissions from processes, at offshore oil and gas production plants, distribution of power and gas, etc., are calculated using sector-specific emission factors from OGP (1995) or plant-specific emission factors. Data is based on the consumption of natural gas and oil products.

### Other emissions

For the power stations, other emissions are calculated on the basis of available terms and conditions; primarily station-specific emission factors are used to calculate the emission.

Methane emissions (CH<sub>4</sub>) and other volatile organic compounds (NMVOC) from other processes, etc., at offshore oil and gas production plants, distribution of power and gas, etc., are calculated using sector-specific emission factors from OGP (1995) or plant-specific emission factors. Data is based on the consumption of natural gas and oil products.

SF<sub>6</sub> gas used in distribution is calculated as discharged emissions on the basis of filling.

### Explanation of development

Direct emission of carbon dioxide (CO<sub>2</sub>) has fallen due to reduced fuel use in the power stations in 2009.

Indirect emission of carbon dioxide (CO<sub>2</sub>) is fallen mainly due to shifts in the production conditions to the grid which has resulted in reduced emission of CO<sub>2</sub> per kWh power produced in eastern Denmark, where the majority of DONG Energy's power consumption takes place.

The fall in NMVOC emissions is mainly due to a fall in venting of natural gas. See more under [materials and energy consumption](#).

The fall in emission of nitrous oxide is due to reduced fuel use in the power stations which is the basis for calculating emission of nitrous oxide.

Emissions of sulphur hexafluoride (SF<sub>6</sub>) is fallen as no major leaks or refills have taken place in 2009 unlike in 2008. Also three supervisors have been trained specifically in handling SF<sub>6</sub> although it is not a legal requirement.

Emission of nitrogen oxides is reduced by 20 % and sulphur oxide (SO<sub>2</sub>) emissions are reduced by 31 % as a result of the decrease in fuel usage and also a calculated effort in the power stations to reduce the emissions.

## 9.7 Water consumption and discharge

Data for water consumption and discharge						
	Unit	Method	2009	2008	2007	2006
<b>Water consumption</b>						
Groundwater from own source	m <sup>3</sup>	m	<b>163,827</b>	75,364	-	-
Waterworks water	m <sup>3</sup>	m	<b>1,450,195</b>	1,751,151	103,935	76,151
<b>Discharges to water</b>						
Wastewater to recipient without own treatment	m <sup>3</sup>	m	<b>564,036</b>	715,836	-	-
Wastewater to recipient after own treatment	m <sup>3</sup>	m	<b>78,183</b>	13,697	-	-
Wastewater to treatment plant without own treatment	m <sup>3</sup>	m/e	<b>811,181</b>	734,857	422,223	536,745
Production water to sea from offshore production	m <sup>3</sup>	m/c	<b>1,548,105</b>	1,685,520	1,435,562	1,199,593
Oil to sea from offshore production	tonnes	m/c	<b>18</b>	24	23	26
<b>Reinjection, offshore</b>						
Reinjection of production water	m <sup>3</sup>	m/c	<b>1,470,238</b>	1,774,842	1,807,757	1,741,237
Reinjection of natural gas	Nm <sup>3</sup>	m/c	<b>91,583,834</b>	52,581,228	39,881,970	51,262,818

A line in the table illustrates that comparable data are not available due to missing, incomplete or different inventories. M = Measured, C=Calculated, E=Estimated

### Compilation method

In most facilities, water consumption and wastewater consumption is reported based on meter readings and calculations. For offices and warehouses, wastewater discharges is set equal to water consumption. On plants, wastewater discharges are registered either based on meters or invoices showing transportation of wastewater. For offshore operations water for special purposes is loaded at the docks. This water usage is not reported.

In oil and gas production, water is not used in the same way as at the other plants. However, a large portion of water, so-called produced water, is pumped up from the underground as a by-product to the products.

Oil discharged to the sea from oil and gas production is calculated based on extracted and injected amounts of products, including the measured contents of oil and produced water. At DONG Energy operated plants, oil discharged with produced water is calculated based on three daily random samples that are analysed for oil content; one test every 24 hours based on ballast water. Reinjection of produced water is based on pump capacity, pressure and time.

Reinjection of natural gas is based on daily flow measurements.

### Explanation of development

The significant increase in groundwater usage from own source is due to changes in the data compilation in 2009 for the power stations, which has changed the distribution between water from waterworks and water from own source. The changed data compilation for the power stations is also the reason for the changes in wastewater discharge directly to recipient and discharge to recipient after own treatment.

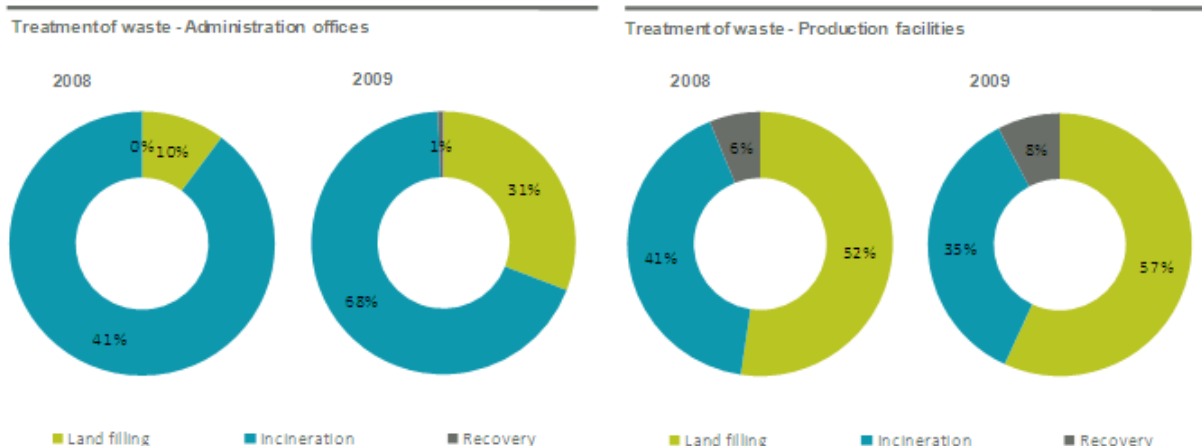
The fall in oil discharge to sea is due to a better cleaning of the production water of the offshore-platforms as well as the fact that the Siri-platform and Lulita-platform have been closed for long periods of 2009.

## 9.8 Waste

Data for waste						
	Unit	Method	2009	2008	2007	2006
<b>Waste</b>						
Waste for recovery	ton	m	<b>5,801</b>	5,302	8,901	10,131
Waste for incineration	ton	m	<b>4,106</b>	5,001	5,606	5,103
Waste for disposal by landfill	ton	m	<b>750</b>	615	5,079	5,838
Total hazardous waste	ton	m	<b>1,979</b>	1,562	792	573
Hazardous waste treated on site	ton	m	<b>797</b>	1,056	4,850	-
Hazardous residuals exported	ton	m	<b>12,183</b>	12,358	11,121	19,896

A line in the table illustrates that comparable data are not available due to missing, incomplete or different inventories. M = Measured, C= Calculated, E= Estimated

DONG Energy has a goal for recycling of waste of 50 % and 65 % for administration and production facilities respectively. The goals are to be fulfilled in 2012. Below the development in the make-up of waste by disposal type can be seen for administration offices and production facilities respectively.



### Compilation method

Waste data is assembled based on invoices received from waste recipients or using plant-specific measuring methods.

For power stations, the reporting also includes projects on existing installations, as waste data from projects form part of the overall waste data at the plants. The data do not include data for offshore installations that are not operated by DONG Energy.

### Corrections to previously reported data

In the annual reporting for 2008 waste data from two locations was omitted by mistake while data from a third location was incorrect. These errors entailed significant miscalculations in the reported data for 2008 and therefore the comparative figures for 2008 have been changed in this reporting. This has also affected the recycling percentage for production facilities in 2008.

### Explanation of development

The recycling percentage for waste from administrations has increased significantly due to the fact that a new waste handling operator has been used increasingly in 2009 and because there has also been increased focus on ensuring a high waste sorting and recycling in the process of introducing the new waste handling operator.

The recycling of waste at production facilities is increased for the same reasons as for administrations though to a lesser extent as the sorting of waste was already relatively good and the recycling of waste higher.

## 9.9 Transport and other environmental aspects

Data for transport and other environmental aspects						
	Unit	Method	2009	2008	2007	2006
<b>Transport</b>						
<b>Fuel for service vehicles</b>						
Diesel	m <sup>3</sup>	m	<b>1,009</b>	1,028	868	-
Gasoline	m <sup>3</sup>	m	<b>7</b>	11	7	-
<b>Transport of employees</b>						
Diesel for company cars	m <sup>3</sup>	m	<b>250</b>	167	104	-
Gasoline for company cars	m <sup>3</sup>	m	<b>335</b>	309	239	-
Emission of CO <sub>2</sub> from transport	tonnes	c	<b>4,167</b>	3,782	3,140	-
<b>Compliance with env. law &amp; codes</b>						
Complaints	no.	m	<b>186</b>	<b>265</b>	-	-
Injoinings and enjunctions	no.	m	<b>5</b>	-	-	-
<b>Other</b>						
Significant environmental incidents	no.	m	<b>5</b>	1	2	-
Excavation damages of gas pipes	no.	m	<b>79</b>	107	118	128
Methane discharge from excavation damages	Nm <sup>3</sup>	c	<b>33,844</b>	25,490	63,647	25,797

A line in the table illustrates that comparable data are not available due to missing, incomplete or different inventories.

M = Measured, C=Calculated, E=Estimated

### Compilation method

#### Fuel consumption

Fuel consumption is calculated based on reporting from leasing partner. Transport has been calculated only for service vehicles in distribution and company cars leased from Nordania leasing. DONG Energy cars registered abroad are not included.

#### Transport emissions

Emissions from fuels have been calculated based on statements from Nordania Leasing.

#### Major environmental accidents

DONG Energy will make calculations of major environmental incidents for the locations we own and operate. We use a model to determine the severity of the environmental incidents on the basis of amount, diversification and effect. The model may also be used to determine the potential impact of the incident, i.e. the extent of the impact that could have resulted from the incident. On the basis of the inherent risk of the environmental incident and its repetition rate, a risk value for the incident is fixed. DONG Energy classifies the incidents with green, yellow and red risk values. Red is considered serious, yellow requires attention, and green has no significance. If the inherent risk of the environmental impact on an incident is severe, it has been categorised as a red risk value.

The number of major environmental incidents with an actual environmental impact categorised as either alarming or severe according to DONG Energy's scoring model of incidents is reported.

#### Excavation damage to gas pipelines

The excavation damages are reported in the internal incident reporting system Synergi.

## **Gas leaks due to excavation damage**

Gas leaks are calculated based on pressure and dimension of the affected process plant, and the period of time during which it was open.

## **Explanation of development**

The consumption of fuels for both service vehicles and company cars and the total CO<sub>2</sub> emission has increased, because the vehicle fleet has increased from 2008 to 2009. It is noticeable that there is a significant increase in the consumption of diesel while the gasoline consumption is almost constant for company cars. This indicates that most of the about 40 new company cars are run on diesel rather than gasoline, which is better for the environment, all other things being equal.

There was five significant environmental accidents in 2009. The increase compared to last year is due to a change in the data collection method.

There was one significant environmental accident in Exploration & Production concerning discharge of oil-containing water with a high oil content equivalent to a spill of about 3.3 m<sup>3</sup> of oil. The discharge was caused by irregularities in the functioning of oil separators. Subsequently a number of initiatives have been implemented to ensure that this does not happen again.

Three of the significant environmental accidents in 2009 happened in Generation. One was a release of coal dust to the environment when offloading the coal, one was an extra emission of NO<sub>x</sub> because of a wrong setting of the burners and one was an oil spill to soil because of a pipe leakage at the oil terminals. Preventive measures for all incidents have been implemented.

The last significant environmental incident happened in Distribution, where a fire occurred in a transformer station with breakers containing SF<sub>6</sub> which caused an emission of SF<sub>6</sub>. The supplier has been notified of the error and the system has been changed.

In 2009 there has been a significant increase in the gas leakage/gas loss due to excavation damages in spite of a fall in the number of excavation damages. The reason for the increase is amongst other things that four of the excavation damages happened on big gas pipes with a pressure of 4 bar and a diameter of 125 mm or above. The venting from these four incidents alone was 22.339 Nm<sup>3</sup>.

## 9.10 EU5

### Allocation of CO<sub>2</sub> emission allowances or equivalent broken down by carbon trading framework

In connection with the Kyoto Agreement and EU's CO<sub>2</sub> reduction targets, the Danish State has permitted DONG Energy and other energy producers in 2012 to emit 57 % of their 1990 CO<sub>2</sub> emissions. If a larger quantity is emitted, the energy producers must finance corresponding CO<sub>2</sub> reductions elsewhere. For this reason, and because it is a responsible enterprise, DONG Energy is making dedicated efforts to reduce CO<sub>2</sub> emissions per kWh produced, while we also purchase EU allowances and CO<sub>2</sub> credits from CO<sub>2</sub> reducing projects in the developing countries and eastern Europe.

For the period 2008-2012, DONG Energy has been granted allowances for the plants that we operate and that are covered by the quota legislation. For DONG Energy, the Siri offshore platform, the Nybro gas treatment plant and 20 power plants are covered by this legislation, all of which are located in Denmark. The allowances are distributed on the individual plants and constitute a total of 9.96 million tonnes CO<sub>2</sub> per year for the DONG Energy operated plants. Of this amount, 2.2 million tonnes constitute heating allowances. The heating allowances are not owned by DONG Energy, but are administrated by DONG Energy for its heat customers.

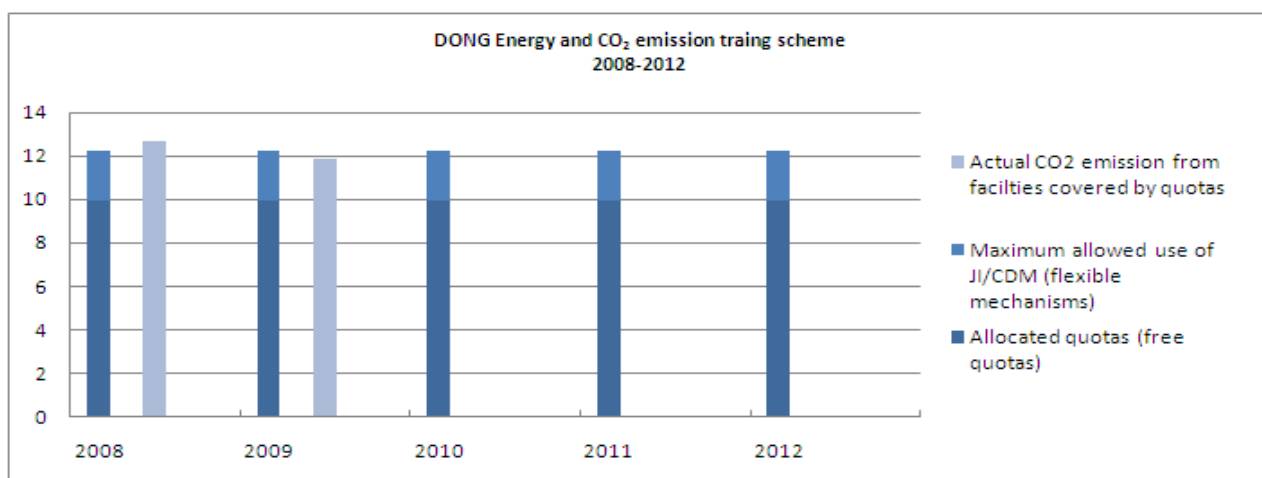
To ensure that actual CO<sub>2</sub> emissions correspond to the allowances available, the expected production and resulting emissions are calculated on a monthly basis. If the expected emissions exceed the allowances available, DONG Energy purchases allowances in the Nordic market, Nord Pool, or uses the flexible mechanisms available to purchase CO<sub>2</sub> credits from CO<sub>2</sub> reducing projects in developing countries and Eastern Europe (JI/CDM). Clean Development Mechanisms (CDM) are projects conducted in countries that have no reduction obligations under the Kyoto Protocol, i.e. the developing countries, and Joint Implementation (JI) are projects conducted in countries having undertaken reduction obligations under the Kyoto Protocol, i.e. primarily Eastern Europe. It is possible for DONG Energy to complete CO<sub>2</sub> reducing projects of up to 2.3 million tonnes CO<sub>2</sub> in credits per year.

As to the heating allowances, it is for the customers to decide whether they want to handle the quota reconciliation themselves and the potential purchase of allowances or credits or whether they want DONG Energy to do this for them. Most heat customers administrate the quota reconciliation themselves.

Each year, external auditors review the actual emissions and verify the emissions. Based on the actual emissions, a corresponding number of allowances and/or credits are returned to the Danish Energy Authority in March of the following year. Allowances are allocated each year in February for the relevant year.

DONG Energy continuously sells and purchases allowances and credits. The actual distribution between allocated allowances (free allowances) and purchased allowances and credits to match actual emissions is determined by a number of factors, including the market conditions. The use of credits, however, is limited. For DONG Energy, the actual CO<sub>2</sub> emissions subject to allowances were 11.9 million tonnes in 2009, which means that the allocated allowances potentially constitute 84 %, while purchased allowances and credits constitute 16 %.

The chart below shows the correlation between the allocated allowances and the maximum number of flexible mechanisms that may be used. Actual emissions for 2008 and 2009 are also illustrated.



## 9.11 EU10

In Denmark, the overall responsibility to supply power and gas rests with the state-owned company Energinet.dk. Energinet.dk owns, maintains and develops public transmission networks and is responsible for planning the power exchange with neighbouring countries.

The Nordic power market has been liberalised, and power is traded and prices are fixed on Nord Pool, the Nordic power exchange. The power companies, including DONG Energy, make their capacity planning on the basis of the expected developments in power prices. In Denmark, securing capacity to cover peak load situations and extreme situations is done through Energinet.dk's purchase of reserves from the market players, including DONG Energy.

Energinet.dk makes an estimate of the future capacity requirement on the basis of projected (expected) consumption, reports on scrapped capacity and annual demand fluctuations. The projections are adjusted on an on-going basis with the actual consumption figures from the power consumption panels representing consumers from various consumption categories. The market secures the required capacity which is sold i.a. on the Nord Pool spotmarket and as reserves to Energinet.dk.

In the other Northern European countries, in which DONG Energy owns capacity, the same distribution between market, production and system responsibility applies and capacity planning is undertaken in the same way. Sweden and Norway are also part of Nord Pool, and the system responsibility rests with Statnett in Norway and Svenska Kraftnät in Sweden respectively. Likewise, the UK has a market for power trade, and the system responsibility rests with Ofgem, and operation of the transmission network is undertaken by the National Grid. In Germany, the transmission network is owned, among others, by the large producers but legally, Germany distinguishes between production and transmission network. The transmission network companies also have the system responsibility, and for this reason they must secure the required capacity.

Name	Country	Technology	MW	MW, DONG Energy ownership	Launch
Overgaard II	DK	Wind	23	11.5	2009

DONG Energy has adopted the following investments of more than 10MW

Name	Country	Technology	MW	MW, DONG Energy ownership	Launch
Mongstad	NO	Gas-fired CCGT	270	270	2010
Severn	UK	Gas-fired CCGT	824	824	2010
Enecogen	NL	Gas-fired CCGT	870	435	2011
Horns Rev II	DK	Offshore wind	209	209	2010
Gunfleet Sands I+II	UK	Offshore wind	173	173	2010
Karcino	PL	Wind	51	51	2010
Karnice	PL	Wind	30	30	2010
Storrún	SE	Wind	30	24	2010
Walney	UK	Offshore wind	367	367	2011
Nygårdsfjell 2	NO	Offshore wind	25.3	12.7	2011
London Array	UK	Offshore wind	630	315	2012
Lincs	UK	Wind	270	67.5	2012



In 2009, DONG Energy mothballed\* the following thermal power station units.

Name	Country	Technology	MW	MW, DONG Energy ownership	Closedown
Asnæs Power Station unit 4	DK	Coal-fired	270	270	2009
Stignæs Power Station unit 1	DK	Coal-fired	130	130	2009

DONG Energy has decided to mothball\* the following power stations units in 2010

Name	Country	Technology	MW	MW, DONG Energy ownership	Closedown
Asnæs Power Station unit 5	DK	Coal-fired	640	640	2010
Studstrup Power Station unit 4	DK	Coal-fired with straw as co-fuel	358	358	2010

\*Closed: When a facility is closed, or mothballed, the capacity of that facility is registered with the Danish Energy Authority but is not included in DONG Energy's capacity, unless Energinet.dk requests the commissioning of the capacity. Asnæs Power Station unit 5 and Studstrup Power Station unit 4 may also be launched in case of failure in other units on these locations with a view to delivering district heating.

## 9.12 LA1

### LA1 response for 2009

	2009	2008
<b>Total workforce</b>	5865	5644
<b>Full time employees</b>	5453	5396
<b>Part time employees</b>	412	248
<b>Contract Individual</b>	54	307
<b>Contract White collar</b>	4228	4184
<b>Contract Blue Collar</b>	1169	1153
<b>Permanent contract Full time</b>	5348	5396
<b>Permanent contract Part time</b>	391	248
<b>Fixed term contract</b>	118	

	2009	2008
Employees in Denmark %	93%	95%
Employees abroad %	7%	5%

The total number of employees in DONG Energy rose by 4% from 2008 to 2009. At the end of 2009, we employed 5865 full-time equivalents. The share of employees abroad rose from 5% in 2008 to 7% in 2009.

### 9.13 LA2

	2009	2008
Employee turnover*	11%	12%

	2009	2008
Number of employees who left the company	615	655
- Male	421	417
- Female	194	238

Distribution by reason	2009	2008
Voluntary resignation	210	518
Dismissal	184	116
Retirement	3	13
Death	13	8

Distribution by age	2009	2008
Under 18	15	17
18-25	102	77
26-35	173	196
36-45	147	174
46-55	82	89
56-70	96	102

\*Employee turnover is calculated as the number of employees who left the company, divided by the average number of employees. The average number of employees is the sum of 12 monthly head count figures, divided by 12.

The number of employees who left the company dropped by 6% from 2008 to 2009.  
Employee turnover has dropped 11%.

## 9.14 LA4

LA4 response 2009

	2009	2008
Number of employees (FTE) covered by collective agreements	3521	3485

In 2009, 60% of the employees were covered by collective agreements.

## 9.15 LA7

Maintaining a good working environment and a high level of security for our employees and contractors is a prerequisite for operating a healthy and efficient business. Hence, we think security into all our activities.

### LTIF

In 2009, the lost time injuries frequency for DONG Energy's own employees was 3.8 (injuries with lost time of one day or more per million working hours, LTIF). By comparison, the injuries frequency for our contractors was 9.7. Hence, the total frequency for 2009 was 6.8, which is 9% lower than in 2008 (7.5).

Unfortunately, one of the injuries among the contractors in 2009 was a fatal accident on a rented drilling rig at the Siri complex. Internal and external investigations of the incident have been initiated to make sure that the proper measures are taken.

The development in LTIF since 2006 appears from figure 1.

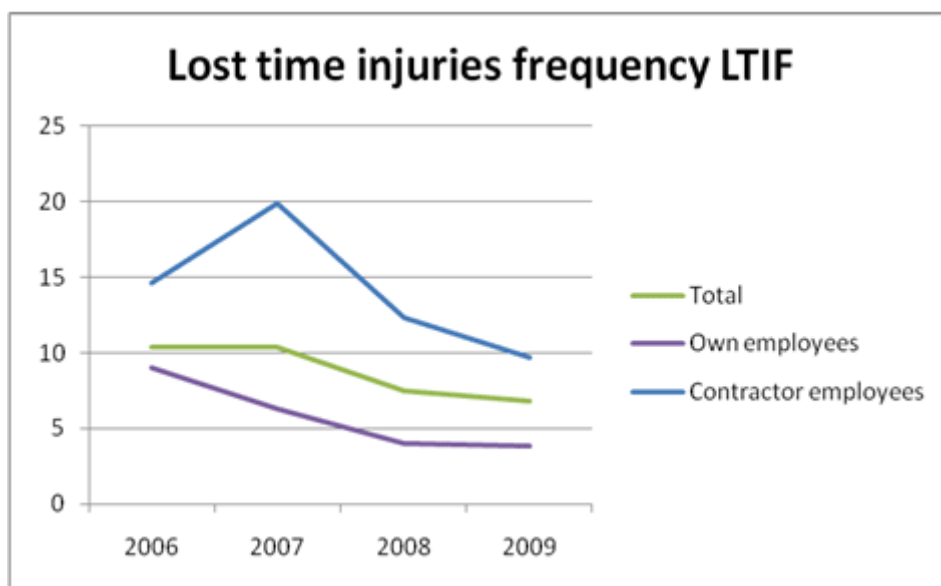


Figure 1: Development in lost time injuries frequency

### Absence due to occupational injuries

Figure 2 shows a picture of sickness absence measured as days of absence due to occupational injuries in 2009. Approximately one third of the injuries led to only 1 or 2 days of absence. 17 injuries each led to 30 days of absence or more. The average absence per injury was 18 days, equal to a lost day rate of 126 days per million working hours.

Most occupational injuries are related to conduct. This means that very few injuries happen due to technical failure. For this reason, we encourage our own employees and external staff to think safety into everything we do. One of the measures we have taken to reduce the number of unwanted incidents is to work out a "secure job analysis" before a task is initiated.

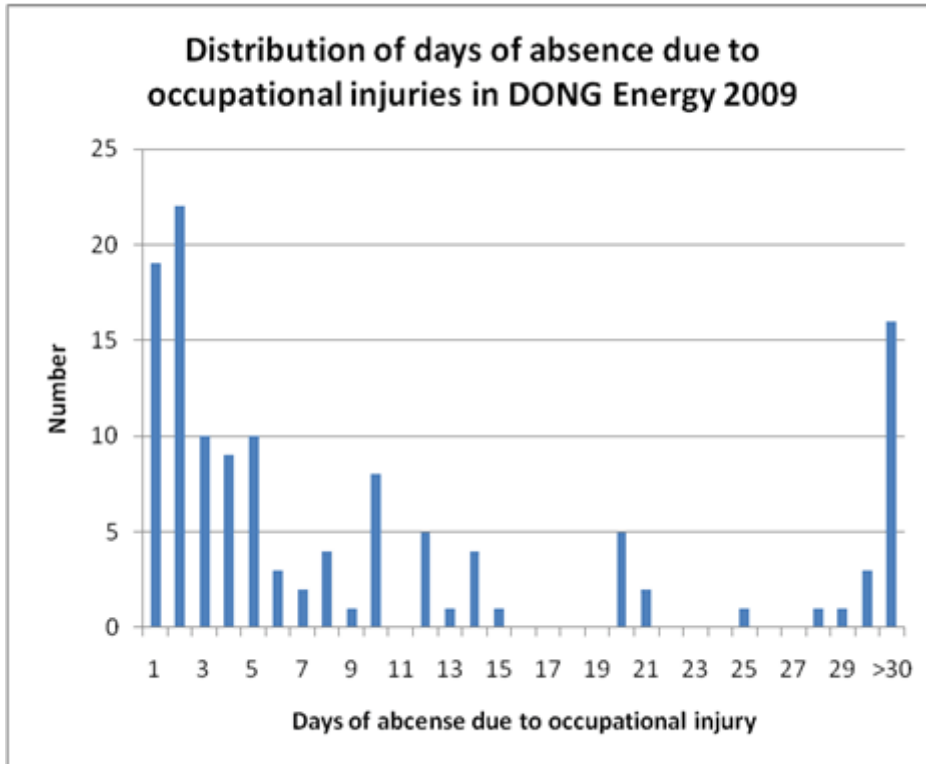


Figure 2: Number of injuries and number of days of absence per injury.

**TRIF**

The development in the total recordable injury frequency, TRIF, appears from figure 3. In addition to occupational injuries with absence, TRIF also covers minor injuries which do not lead to absence, and at DONG Energy, we also include first-aid injuries). TRIF (including contractors) amounted to 26 in 2009, a small increase relative to 2008 (25). TRIF for our own employees increased significantly from 15 in 2008 to 22 in 2009. We will look further into this matter in 2010. TRIF excluding first-aid cases stood at 14 in 2009 (including contractors).

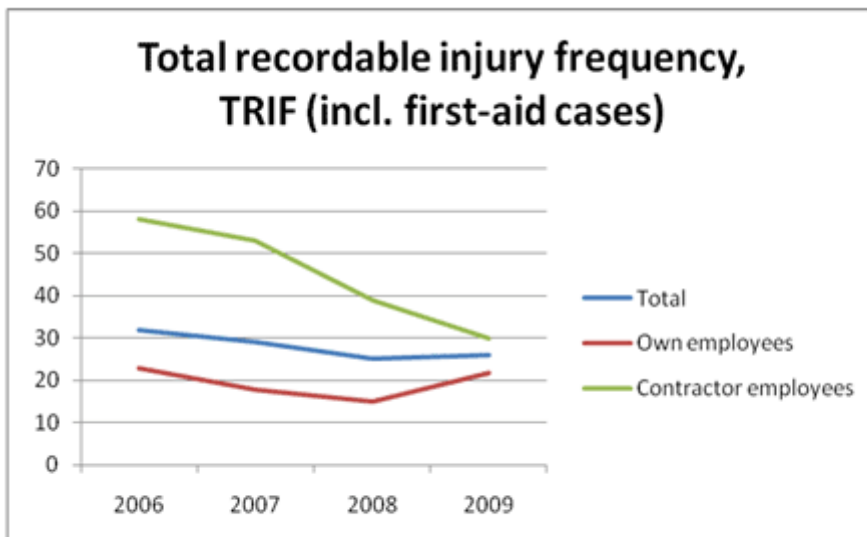


Figure 3: Development in total recordable injury frequency, TRIF  
See the LA8 response for information on the number and frequency of occupational diseases.

**Data**

## Number of fatal accidents

	2009	2008	2007	2006
Total	1	1	0	0
Own employees	0	0	0	0
Contractors	1	1	0	0

## Fatality rate, FAR (number per 100 million working hours)

	2009	2008	2007	2006
Total	5.3	6.7	0	0

Lost time injuries LTI<sup>i</sup>, - including fatal accidents

	2009	2008	2007	2006
Total	129	112	112	99
Own employees	35	35	47	64
Contractors	94	77	65	35

## Lost time injury frequency, LTIF (number per million working hours) including fatal accidents

	2009	2008	2007	2006
Total	6.8	7.5 <sup>ii</sup>	10.4 <sup>iii</sup>	10.4
Own employees	3.8	4.0	6.3	9.0
Contractors	9.7	12.3	19.9	14.6

## Number of total recordable injuries, TRI – including first-aid cases

	2009	2008	2007	2006
Total	484	376	310	306
Own employees	198	130	138	166
Contractors	286	246	172	140

## Total recordable injuries frequency, TRIF – including first-aid cases

	2009	2008	2007	2006
Total	26	25	29	32
Own employees	22	15	18	23
Contractors	30	39	53	58

## Number of days of absence due to occupational injuries – own and contractors

	2009	2008	2007	2006
Days of absence	2366	1371	796	1090
Days of absence per million working hours (lost day rate)	126	92	74	114

<sup>i</sup> Lost time means that the injured employee was unable to work for one day or more after the day the injury occurred.

<sup>ii</sup> Changed from 7.4 to 7.5 after external audit

<sup>iii</sup> Changed from 10.3 to 10.4 after external audit

## 9.16 LA8

**Full response to the GRI indicator LA8 2009 based on input from Group HR and the business areas as well as data from LA7 (work-related illness).**

### Serious illness

In 2009, 20 cases of work-related illness (occupational diseases) were reported to the National Board of Industrial Injuries, primarily involving musculoskeletal disorders and hearing diseases. *In 2009, the National Board of Industrial Injuries issued orders in 25 cases, of which 20 were rejected and 5 were acknowledged.*

Table 1 shows the development in reported work-related illness in Denmark since 2006.

Table 1. The development in reported work-related illness in Denmark.

	2009	2008	2007	2006
Number of reported cases	20	28	21	34
Reporting frequency (number reported per million working hours)	2.4	3.2	2.8	4.8

### Pension & Insurance

All employees at DONG Energy, in Denmark as well as abroad, are covered by a pension scheme from the first day of employment. Furthermore, all employees in Denmark receive insurance coverage for critical illness, group life insurance and treatment insurance. For employees outside Denmark, similar insurances have been taken out abroad with due consideration for the offers/possibilities in the individual countries.

In 2009, the insurance for critical illness was used 21 times. As far as health insurance is concerned, 1,566 employees and their spouses/cohabitants and children received treatment in 2009. About 50% of the enquiries were for physiotherapy and chiropractor treatments, while about 14% of the enquiries were for psychological treatment.

### Centralised health policy

In 2009, DONG Energy centralised its health policy to the effect that all health measures were compiled centrally at DONG Energy. Currently, efforts are being made to establish a health program, which means that in 2010 a pilot project will be completed at selected locations. At the present time, the content of the program has not been determined, but it is expected that the participants of the pilot project will be offered health checks. The result of these health checks will form the basis of a number of measures not yet determined. If the pilot project yields positive results, it is expected that all employees will be offered health checks.

### Examples of preventive activities in 2009

DONG Energy's safety organisations and HR functions continuously work to prepare measures preventing work-related illness. Examples of measures in 2009. At group level, information and good advice for stress prevention have been issued, which is available for all employees. In the Sales & Distribution segment, various measures were implemented within Work Life Balance, which focus on the difficult balance between job and leisure. In this segment an external ergotherapist was also made available one day a week, giving advice on office workplace design, cars, etc. In the Generation segment, occupational health and safety management was implemented in compliance with the international standard, OHSAS 18001, which, among other things, works systematically to prevent industrial injuries, including noise nuisances at power stations. In the Exploration & Production and Markets segments, a welfare policy has been implemented, which focuses on stress prevention.

### Central compilation of correspondence with the National Board of Industrial Injuries

As at 1 January 2010, correspondence with the National Board of Industrial Injuries in cases on work-related illness will be compiled centrally at DONG Energy to facilitate identification of possible trends and preparation of proposals for precautionary measures across all segments.



## 9.17 LA13

LA13 response 2009

DONG Energy has set up a cooperative structure that covers all employees in Denmark and is divided into three overall levels. The three levels are the Corporate Liaison Committee, Main Liaison Committee and the Liaison Committee. All committees consist of management and employee representatives, and topics such as financial matters, operations and staff issues are discussed at the meetings. The purpose is to improve cooperation between management and employees through cooperation and information, and thereby create good working conditions and increase the understanding of DONG Energy's situation and development.

Distribution of male and female employees at different managerial levels

		Male	Female
Diversity employee category	Executive board (group management)	6	0
	Executives (strategic forum) (Managers)	48	5
	Senior managers and above	191	24
	Managers	448	137

Distribution of male and female employees in different age groups

		2009	
		Male	Female
Diversity - Age	Under 18	3	2
	18-25	135	108
	26-35	944	505
	36-45	1.269	619
	46-55	1.110	325
	56-70	698	144



PROFILE	Reference	Coverage
<b>1. Strategy and Analysis</b>		
1.1 Preface from the CEO	Responsible Energy 2009, page 1	●
1.2 Description of key impacts, risks, and opportunities	page 28-33 and Responsible Energy 2009, page 1 and page 4-6	●
<b>2. Organisational profile</b>		
2.1 Name of the organisation	cover	●
2.2 Primary brands, products, and/or services	page 6-7	●
2.3 Operational structure of the organisation	page 157-161	●
2.4 Location of organisation's headquarters	cover	●
2.5 Countries where the organisation operates	page 6, 7, 37, 43, 45, 49 and 57	●
2.6 Nature of ownership and legal form	page 60	●
2.7 Markets served	page 6-7	●
2.8 Scale of the reporting organisation	online	●
2.9 Changes during the reporting period regarding size, structure or ownership	page 113-117, 162-166	●
2.10 Awards received in the reporting period	online	●
<b>3. Parameters</b>		
EU1 Capacity	online	●
EU2 Net energy output	online	●
EU3 Number of residential, industrial/commercial customer accounts	online	●
EU4 Length of transmission and distribution lines by voltage	online	●
EU5 Allocation of CO <sub>2</sub> emissions permits	online	●
3.1 Reporting period	page 162-166	●
3.2 Date of the most recent report	See DONG Energy's online CSR reports	●
3.3 Reporting cycle	page 162-166	●
3.4 Contact point for questions regarding the report and its content	cover	●
3.5 Process for defining report content	online	●
3.6 Boundary of the report	page 162-166	●
3.7 Specific limitations on the scope or boundary of the report	see page 3.5 (link)	●
3.8 Basis for reporting on joint ventures, subsidiaries etc.	page 162-166	●
3.9 Data measurement techniques and the bases of calculations	page 162-166	●
3.10 Explanation of any re-statements of information in earlier reports	page 162-166	●
3.11 Significant changes from previous reporting periods	page 162-166	●
3.12 GRI content index	cover	●
3.13 Assurance	page 162-166	●
<b>4. Governance, Commitments, and Engagement</b>		
4.1 Governance structure of the organisation	page 60	●
4.2 Indicate whether the chair of the highest governance body is also an executive officer	page 1 and page 63	●
4.3 Members of the highest governance body that are independent and nonexecutive members	page 60-61	●
4.4 Mechanisms to provide recommendations or direction to the highest governance body	page 60-61	●
4.5 Linkage between compensation performance	page 61 and 86-87	●
4.6 Processes in place for the highest governance body to ensure conflicts of interest are avoided	page 61	●
4.7 Process for determining the qualifications of the members of the highest governance body	page 60 - 61	●
4.8 Internally developed statements of mission or values, principles etc.	Responsible Energy 2009, page 2 and page 18	●
4.9 The supervision by the highest governance body with the management of results, for example within finance/economy	page 61	●
4.10 Processes for evaluating the highest governance body's own performance	page 61	●

4.11	Use of the precautionary approach or principle in the organization	page 28-29 and Responsible Energy 2009, page 4-7	●
4.12	Externally developed initiatives to which the organisation endorses	online	●
4.13	Memberships in associations and advocacy organisations	online	●
4.14	List of stakeholder groups engaged by the organisation	online	●
4.15	Basis for identification and selection of stakeholders with whom to engage	online	●
4.16	Approaches to stakeholder engagement	online	●
4.17	Key topics and concerns that have been raised through stakeholder engagement	online	●

## 5. Management Approach

DMA	Management approach, economy	Responsible Energy 2009, page 2	●
DMA	Management approach, environment	Responsible Energy 2009, page 2	●
DMA	Management approach, labour practices	Responsible Energy 2009, page 2	●
DMA	Management approach, human rights	Responsible Energy 2009, page 2	●
DMA	Management approach, society	Responsible Energy 2009, page 2	●
DMA	Management approach, products	Responsible Energy 2009, page 2	●

## PERFORMANCE INDICATORS

### Economic

EU6	Planning to ensure short and long-term electricity availability and reliability	online	●
EU7	Demand-side management programs for electricity	online	●
EU8	Development activities aimed on providing electricity and promoting sustainability	online	●
EC1	Direct economic value generated and distributed.	page 4	●
EC2	Risks and opportunities for the organisation's activities due to climate change	online	●
EC4	Significant financial assistance received from government	page 90	●
EU10	Planned capacity (MW) against projected demand.	online	●
EU11	Average generation efficiency.	online	●
EU12	Transmission and distribution efficiency	online	●

### Environment

EN1	Materials used by weight or volume	online	●
EN2	Percentage of materials used that are recycled	online	●
EN3	Direct energy consumption by primary energy source	online	●
EN4	Indirect energy consumption by primary source	online	●
EN5	Energy saved due to conservation and efficiency improvements	online	●
EN6	Energy-efficient or renewable energy-based products and services	online	●
EN8	Total water withdrawal by source	online	●
EN11	Locations managed in, or adjacent to, protected areas	online	●
EN12	Significant impacts on biodiversity in protected areas	online	●
EN16	Total direct and indirect greenhouse gas emissions	online	●
EN18	Reduction of greenhouse gas emissions	online	●
EN20	NOx, SOx, and other significant air emissions	online	●
EN21	Total water discharge by quality and destination	online	●
EN22	Total weight of waste by type and disposal method	online	●
EN23	Total number and volume of significant spills	online	●
EN24	Weight of waste deemed hazardous and percentage of waste shipped internationally	online	●
EN28	Fines and sanctions for noncompliance with environmental laws and regulations	online	●
EN29	Significant environmental impacts of transporting	online	●

### Labour

EU14	Programs to ensure the availability of a skilled workforce	online	●
EU15	Employees eligible to retire in the next 5 and 10 years	online	●
EU16	Policies regarding health and safety	online	●
LA1	Workforce by employment type, employment contract, and region	online	●
EU17	Total subcontracted workforce	online	●
EU18	Contractors that have undergone health and safety training	online	●

LA2	Employee turnover by age group, gender, and region	online	●
LA4	Employees covered by collective agreements	online	●
LA5	Minimum notice period(s) regarding significant operational changes	online	●
LA7	Rates of occupational disease, absenteeism and fatalities	online	●
LA8	Programmes in place to assist regarding serious diseases	online	●
LA10	Average hours of training per year per employee	online	►
LA12	Employees receiving performance and career development reviews	online	►
LA13	Composition of governance bodies and employees	online	●
LA14	Ratio of basic salary of men to women	online	○

### Human Rights

HR1	Investment agreements that include human rights clauses	online	●
HR2	Contractors that have undergone screening on human rights	online	►
HR3	Training on policies and procedures concerning aspects of human rights	online	►
HR4	Total number of incidents of discrimination and actions taken	online	●
HR6	Risk for incidents of child labour, and initiatives to the eliminate these	online	●

### Society

EU21	Disaster/emergency management plan and training programs, and recovery/restoration plans	online	●
S01	Impacts of operations on communities	online	○
S02	Business units analysed for risks related to corruption	online	►
S03	Training in anti-corruption policies and procedures	online	●
S04	Actions taken in response to incidents of corruption	online	►
S05	Public policy positions and participation in public policy development	online	●
S06	Value of financial and in-kind contributions to political parties or the like	online	●
S07	Legal actions for anti-competitive behaviour or the like	online	●
S08	Fines and sanctions for noncompliance with laws and regulations	online	●

### Products

PR1	Life cycle assessment of health and safety impacts of products and services	online	●
PR2	Non-compliance with regulations concerning health and safety impacts from products and services	online	●
EU25	Number of injuries and fatalities involving company assets	online	●
PR3	Information about products and services required by procedures	online	●
PR4	Non-compliance with regulations concerning product and service information and labelling	online	●
PR5	Practices related to customer satisfaction	online	►
PR6	Compliance with laws etc. related to marketing communications	online	●
PR7	Non-compliance with regulations concerning marketing communications	online	●
PR8	Protection of customers privacy and losses of customer data	online	●
PR9	Fines concerning the provision and use of products and services	online	●
EU27	Residential disconnections for non-payment	online	●
EU28	Power outage frequency	online	●
EU29	Average power outage duration	online	●
EU30	Average plant availability factor	online	●

Fully reported ●  
 Partially reported ►  
 Not reported ○