

FACT SHEET - ATP

Name	Arbejdsmarkedets Tillægspension ("ATP") ¹
Address	Kongens Vænge 8, 3400 Hillerød, Denmark
Company reg. no. (CVR)	43405810
LEI-code	549300Y1IIQ0WYJR9F68
Legal basis	ATP is a self-governing institution, established in 1964 under the Danish Act on Labour Market Supplementary Pension, currently Consolidated Act No. 1110 of 10 October 2014, as amended (the "ATP Act"). In relation to the placement of funds the ATP Act is to a large extent a mirror of the Danish regulation of life insurance companies and pension funds in the Danish Financial Business Act. Handling of pension liabilities is subject to the ATP Act.
Supervisory authority	For matters relating to the pension and investment activities, such as the basis for pension and reserves as well as placement of funds, ATP is under supervision of the Danish Financial Supervisory Authority. (As ATP is established by law no concession to perform pension and investment activities is granted by any authority). The ATP Act is within The Danish Ministry of Employment's area of responsibility.
Articles of Association	The Articles of Association of ATP are issued by the Danish Ministry of Employment, currently in Executive Order No. 612 of 23 May 2018.
Purpose	The purpose of ATP is to distribute supplementary pension payments to salaried employees etc. in accordance with the ATP Act. In connection thereto ATP receives contributions and manage the funds in the best interest of the members and operates other operations in accordance with the ATP Act as well as related matters of a minor character (Section 2 of the Articles of Association).
EMIR	ATP is subject to EMIR ² . ATP is classified as a non-financial counterparty and is above the clearing threshold (NFC+). ATP has been granted an exemption from central clearing pursuant to Article 89(2) of EMIR.
MiFID II	For client classification purposes under MiFID II ³ ATP is an "other financial institution authorised or regulated under national law". ATP generally requests to be categorized as a "professional client". ATP is not an investment firm under MiFID II. ATP is not subject to the inducements ban.
SFTR	ATP is subject to SFTR ⁴ .
AML	ATP is not subject to the Danish Anti-money Laundering Act ⁵ . Appointment to ATP's board of directors and/or ATP's board of representatives does not entail status as a politically exposed person (PEP) as ATP is a self-governing institution and not a state-owned company or a government agency.
Solvency II	ATP is not subject to Solvency II ⁶ but certain principles from Solvency II apply to ATP by implementation in or pursuant to the ATP Act.

This fact sheet is provided for information purposes only. For matters relating to applicable law it represents ATP's view and interpretation. Nothing herein shall constitute legal advice of any kind. The information is updated as of the date stated above. ATP does not undertake to notify you of any changes to the information herein. Additional information may be found at www.atp.dk/en or be addressed to pilegal@atp.dk

¹ This fact sheet relates to ATP only and not to any subsidiaries of ATP.

² Regulation (EU) No. 648/2012 of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties and trade repositories, as amended.

³ Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU.

⁴ Regulation (EU) No. 2015/2365 of the European Parliament and of the Council of 25 November 2015 on transparency of securities financing transactions and of reuse and amending Regulation (EU) No. 648/2012.

⁵ Act No. 1062 of 19 May 2021.

⁶ Directive 2009/138/EC of the European Parliament and of the Council of 25 November 2009 on the taking-up and pursuit of the business of Insurance and Reinsurance (Solvency II), as amended.