

## Statement for financial year 2020 on how ATP complies with/explains the Recommendations on Corporate Governance from November 2017 from the Corporate Governance Committee

The ATP Act includes regulation of a number of issues related to ATP's management and governance which are also discussed in the Recommendations on Corporate Governance. Although there is no statutory obligation for ATP to follow the governance recommendations, ATP's Supervisory Board has decided to follow them according to the comply-or-explain principle. Where ATP's specific circumstances prescribe deviations from the recommendations, this is either explained or marked "not applicable" (n/a).

Recommendation	Complied with or explained	Documentation /reference	Traffic lights	Publication
<b>1. Communication and interaction by the company with its investors and other stakeholders</b>				
<i>1.1. Dialogue between company, shareholders and other stakeholders</i>				
1.1.1 It is <b>recommended</b> that the board of directors ensures ongoing dialogue between the company and its shareholders in order for the shareholders to gain relevant insight into the company, and for the board of directors to understand the attitudes, interests and opinions on the company held by shareholders.	Complied with/Explained	In this context, the members, labour and management, ministries and other external stakeholders are equated with shareholders.		Website Social media The Faktum newsletter Responsibility reports Regular dialogue
1.1.2. It is <b>recommended</b> that the board of directors adopt policies on the company's relationship with its stakeholders, including shareholders, and ensures that the interests of stakeholders are respected in accordance with company policies.	Complied with	ATP has adopted a Policy for Communication and Public Relations.		
1.1.3. It is <b>recommended</b> that the company publish quarterly reports.	Complied with	ATP publishes quarterly reports for Q1 and Q3 in addition to the statutory annual report and interim report for H1.		Website press releases
<i>1.2. Annual general meeting</i>				
1.2.1. It is <b>recommended</b> that, when organising the company's annual general meeting, the board of directors plans the meeting to support active ownership.	Complied with/Explained	ATP is managed by a Board of Representatives, a Supervisory Board and a Chief Executive Officer (CEO). ATP's Board of Representatives meeting is regarded as the annual general meeting. The Supervisory Board determines the time for the Board of Representatives Meeting one year in advance, and the members of the Board of Representatives are informed as soon as possible thereafter.		

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1.2.2. It is <b>recommended</b> that proxies granted for the annual general meeting allow shareholders to consider each individual item on the agenda.	Complied with	Proxies that make it possible to consider each individual item on the agenda are submitted along with the material for Supervisory Board meetings as well as the meeting of the Board of Representatives.		
<b>1.3. Takeover bids</b>				
1.3.1. It is <b>recommended</b> that the company set up contingency procedures in the event of takeover bids from the time that the board of directors has reason to believe that a takeover bid will be made. The contingency procedures should determine that the board of directors should not, without the acceptance of the annual general meeting, attempt to counter the takeover bid by making decisions which in reality prevent the shareholders from deciding on the takeover bid.	n/a			
<b>2. Tasks and responsibilities of the board of directors</b>				
<b>2.1. Overall tasks and responsibilities</b>				
2.1.1. It is <b>recommended</b> that at least once a year the board of directors take a position on the matters related to the board's performance of its responsibilities.	Complied with	The Supervisory Board plans its regular, recurring work for the year to come via the adoption of a circular annual plan according to which board meetings are planned. In addition, annual board themes are determined in the form of continuing issues which the board will consider throughout the year.		
2.1.2. It is <b>recommended</b> that at least once a year the board of directors take a position on the overall strategy of the company with a view to ensuring value creation in the company.	Complied with	With due consideration to the business model as delineated by the ATP Act, the Supervisory Board determines ATP's overall goals and strategies. This is followed up every six months.		
2.1.3. It is <b>recommended</b> that the board of directors ensure that the company has a capital and share structure ensuring that the strategy and long-term value creation of the company are in the best interest of the shareholders and the company, and that the Supervisory Board presents this in the management's review of the company's annual report and/or on the company's website.	Complied with	At least once per year, the Supervisory Board performs an assessment of own risk and solvency status based on a going concern assumption, both for the short and long term.  The Supervisory Board has determined a bonus policy which in detail describes the principles for an increase in pensions to ATP's members and the payment of bonus to ATP's pensioners.		Annual Report Solvency & Financial Condition Report (SFCR) Website

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2.1.4. It is <b>recommended</b> that the board of directors annually review and approve guidelines for the executive board; this includes establishing requirements for the executive board on reporting to the board of directors.	Complied with	<p>ATP is subject to a range of enhanced governance regulations similar to those applying to financial undertakings, cf. the statutory order for governance in ATP.</p> <p>The Supervisory Board reviews and audits guidelines for the CEO (Chief Executive Officer) and other guidelines on an annual basis. The Supervisory Board also annually considers the frequency and scope of the CEO's reporting to and providing of information to the Supervisory Board.</p>		
2.1.5. It is <b>recommended</b> that at least once a year the board of directors discuss the composition of the executive board, as well as developments, risks and succession plans.	Complied with	<p>The Supervisory Board assesses on an ongoing basis whether the CEO is performing in accordance with ATP's strategy and targets, risk profile, policies and guidelines.</p> <p>The Executive Board's performance and succession plans are considered on an annual basis by the Executive Committee and the Supervisory Board.</p>		
<b>2.2. Responsibility</b>				
2.2.1. It is <b>recommended</b> that the board of directors adopt policies on corporate social responsibility.	Complied with	The Supervisory Board has determined a Policy for Responsibility, a Policy for Stewardship, a Policy for Tax for Private Equities, and a Policy for Diversity.		The Policy for Responsibility and reports on Stewardship, ESG in illiquid assets, Human Capital, ATP as a responsible investor and Tax Code can be found on ATP's Website
<b>2.3. Chairman and Vice-Chairman of the Supervisory Board</b>				
2.3.1. It is <b>recommended</b> that a Vice-Chairman of the board of directors is appointed who will assume the responsibilities of the Chairman in the event of the Chairman's absence, and who will also act as effective sparring partner for the Chairman.	n/a	The composition of the Supervisory Board is determined in the ATP Act, including that the Supervisory Board is chaired by an independent Chairman. The ATP Act does not stipulate the appointment of a vice-chairman.		

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<p>2.3.2. It is <b>recommended</b> that if the board of directors, in exceptional cases, asks its Chairman or other board members to perform special tasks for the company, including briefly participating in the day-to-day management, a board resolution to that effect is passed to ensure that the board of directors maintains its independent, overall management and control function. Decisions regarding the participation by the Chairman or other board members in day-to-day management and expected duration should be published.</p>	Complied with	<p>The Chairman of the Supervisory Board is independent and does not perform operational tasks for ATP or participate in day-to-day management, and no board members participate in day-to-day management.</p>		
<p><b>3. Composition and organisation of the board of directors</b></p>				
<p><i>3.1. Composition</i></p>				
<p>3.1.1. It is <b>recommended</b> that the board of directors annually assesses and includes a statement in the management review regarding</p> <ul style="list-style-type: none"> <li>• the skills which the board of directors must have to best perform its tasks;</li> <li>• the composition of the board of directors, and;</li> <li>• the special skills of each member.</li> </ul>	Complied with	<p>The composition of the Supervisory Board is prescribed by the Danish ATP Act. The Supervisory Board reports on its composition, competences (including those of individual members), and other directorships in the annual report.</p> <p>The Supervisory Board discusses its overall competences in connection with the annual self-assessment.</p> <p>The Supervisory Board has augmented itself by a number of members with expertise and operational experience from financial companies as well as accounting, auditing, IT and pension issues.</p>		Annual report
<p>3.1.2. It is <b>recommended</b> that the board of directors discuss the company's activities on an annual basis to ensure relevant diversity in the company's management levels and that it prepares and adopts a diversity policy. The policy should be published on the company's website.</p>	Complied with	<p>The ATP Act determines that the Board of Representatives and Supervisory Board should, as far as possible, have a balanced composition of men and women.</p> <p>The Supervisory Board has set target figures and policy in its Policy for Diversity for the underrepresented gender in ATP's senior management and for other management levels with a view to</p>		The Policy for Diversity is published on ATP's website.

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		satisfying the requirement of a balanced composition of men and women. The Supervisory Board discusses on an annual basis which activities to engage in to ensure diversity.		
3.1.3. It is <b>recommended</b> that the selection and nomination of candidates for the board of directors be carried out through a thoroughly transparent process approved by the board of directors. When assessing its composition and nominating new candidates, there should, in addition to the need for competences and qualifications, be a consideration of the need for renewal and diversity.	n/a	<p>The regulations for nomination and selection of members of the Supervisory Board, including the independent Chairman, are prescribed in the ATP Act. The ATP Act also prescribes that a balanced composition of men and women on the Supervisory Board must be ensured.</p> <p>ATP is subject to a range of enhanced governance regulations similar to those applying to financial undertakings, including that members of the Supervisory Board must be 'fit and proper' approved by the Financial Supervisory Authority.</p>		
<p>3.1.4. It is <b>recommended</b> that when election to the board of directors is on the agenda of an annual general meeting, a description is sent with notice of the meeting on the nominated candidates' competences, including information on their</p> <ul style="list-style-type: none"> <li>• other executive functions, e.g. memberships in executive boards, boards of directors, and supervisory boards, including board committees in Danish and foreign enterprises</li> <li>• requiring organisational tasks.</li> </ul> <p>It must also be stated if the candidates for the board of directors are considered to be independent.</p>	n/a	<p>The requirements for members of the Supervisory Board are prescribed by the ATP Act. It is a precondition that members are approved as 'fit &amp; proper' by the Financial Supervisory Authority.</p> <p>Other executive functions held by members of the Supervisory Board are detailed in the annual report.</p>		
3.1.5. It is <b>recommended</b> that members of a company's executive board are not members of the board of directors and that a resigning CEO does not directly assume the role of Chairman or Vice-Chairman of the board of directors for that same company.	Complied with	The requirements for members of the Supervisory Board are prescribed by the ATP Act and by the rules of procedure for ATP's Supervisory Board.		

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3.1.6. It is <b>recommended</b> that members of the board of directors elected by the annual general meeting are eligible for re-election every year at the ordinary annual general meeting.	n/a	The three-year election period for the members of the Supervisory Board is prescribed by the Danish ATP Act. One third of the members of the Supervisory Board are appointed each year to ensure Supervisory Board continuity.		
<i>3.2. Independence of the board of directors</i>				

Recommendation	Complied with or explained	Documentation /reference	Traffic lights	Publication
<p>3.2.1. It is <b>recommended</b> that at least half of the members of the board of directors elected by the annual general meeting be independent persons, in order for the board of directors to be able to act independently of special interests.</p> <ul style="list-style-type: none"> <li>• To be considered independent, a member may not:</li> <li>• be or within the past five years have been member of the executive board, or senior staff member in the company, a subsidiary undertaking or an associate;</li> <li>• within the past five years, have received larger emoluments from the company/group, a subsidiary undertaking or an associate in another capacity than as member of the board of directors;</li> <li>• represent or be closely associated with a shareholder with a controlling interest;</li> <li>• within the last year, have had a material business relationship (e.g. personally or indirectly as a partner or an employee, shareholder, customer, supplier or member of a governing body of companies with similar relations) with the company, a subsidiary or an associated company;</li> <li>• be or within the past 3 years have been employed by or a partner in the same company as the auditor elected by the annual general meeting;</li> <li>• be a chief executive in a company holding executive level cross-memberships with the company;</li> <li>• have been member of the board of directors for more than 12 years, or;</li> <li>• be a close relative of anyone not considered independent.</li> </ul> <p>Regardless of a member of the board of directors not being included in the aforementioned criteria, there may be other circumstances which lead to the board of directors deciding that a member or several members cannot be considered to be independent.</p>	n/a	<p>The regulations for nomination and selection of members of the Supervisory Board and its composition are prescribed in the ATP Act.</p> <p>ATP's Supervisory Board is also composed of members from employer and employee organisations and an independent Chairman.</p>		Annual report

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<b>3.3. Members of the board of directors and the number of other executive functions</b>				
3.3.1. It is <b>recommended</b> that each member of the board of directors assesses the expected time commitment for each function in order that the member does not take on more functions than they can manage satisfactorily for the company.	Complied with	Supervisory Board members are appointed by the Minister for Employment upon nomination by the organisations specified in the Danish ATP Act. The organisation makes this assessment when nominating members for appointment. Other executive functions held by members are detailed in the annual report.		Annual report
3.3.2. It is <b>recommended</b> that the management review, in addition to the provisions laid down by legislation, includes the following information about the members of the board of directors: <ul style="list-style-type: none"> <li>• the position of the relevant person;</li> <li>• the age and gender of the relevant person;</li> <li>• the competences and qualifications of relevance to the company held by the relevant person;</li> <li>• whether the member is considered independent;</li> <li>• the date of appointment to the board of directors of the member;</li> <li>• expiry of the current election period;</li> <li>• the member's participation in board and committee meetings;</li> <li>• the member's other executive functions, including memberships of executive boards, boards of directors and supervisory boards, including board committees, in Danish and foreign companies as well as demanding organisational tasks, and;</li> <li>• the number of shares, options, warrants and similar in the company, and other group companies of the company, owned by the member, as well as changes in the portfolio of the member of the securities mentioned which have occurred during the financial year.</li> </ul>	Complied with/Explained  n/a	The individual member's function, age and gender, date of appointment, expiry of appointment period, competencies, and other executive functions, etc., are indicated in the annual report. The individual members' participation in Supervisory Board and committee meetings is also indicated in the annual report.  Information regarding independence and holdings of shares, options, warrants, etc. is not relevant as ATP is a self-governing institution.		Annual report



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3.3.3. It is <b>recommended</b> that the annual assessment procedure, cf. Section 3.5, contains an assessment of what is considered a reasonable level of other executive functions, taking into consideration the number, level and complexity of the individual additional executive functions.	Complied with	As part of the annual assessment procedure, the members consider their own effort and efficiency relative to relevant legislation, ATP's activities and the recommendations for good corporate governance.		Annual report
<b>3.4. Board committees</b>				
3.4.1. It is <b>recommended</b> that the company publish the following on the company's website: <ul style="list-style-type: none"> <li>the terms of reference of the board committees;</li> <li>the most important activities of the committees during the year and the number of meetings held by each committee, and;</li> <li>the names of the members of each committee, including the chairmen of the committees, as well as information on which members are independent members and which members have special qualifications.</li> </ul>	Complied with	The Executive Committee, the Audit Committee and the Risk Committee composition, chairmen, purpose, activities – including tasks performed by the Executive Committee as Remuneration Committee – and number of meetings is detailed in the annual report. Terms of reference/the Executive Committee's rules of procedure are published on the website. The Supervisory Board has assessed that the members of the committees have the necessary skills and qualifications. Special qualifications held by members are indicated in the annual report.		Annual report Procedures of the Executive Committee Terms of reference of the Audit Committee and Terms of reference of the Risk Committee are published on ATP's website.
3.4.2. It is <b>recommended</b> that a majority of the members of a board committee be independent.	Complied with	The Supervisory Board has assessed that the independence of the overall committee is adequate.		
3.4.3. It is <b>recommended</b> that an <u>audit committee</u> is elected from the members of the board of directors and that a Chairman of the committee is elected who is not the Chairman of the board of directors.	Complied with	ATP's Audit Committee was created in 2009. The composition of the Audit Committee reflects the composition of ATP's Supervisory Board. The Chairman of the Supervisory Board is not Chairman of the audit committee.		Terms of reference of the Audit Committee
3.4.4. It is <b>recommended</b> that the audit committee, prior to the approval of the annual report and other financial reports, <ul style="list-style-type: none"> <li>monitors and reports to the board of directors about:</li> <li>significant accounting policies;</li> <li>significant accounting estimates;</li> <li>related party transactions, and;</li> <li>uncertainties and risks, including in relation to the outlook for the current year.</li> </ul>	Complied with	Complied with and set out in the Terms of Reference of the Audit Committee.		Terms of reference of the Audit Committee

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<p>3.4.5. It is <b>recommended</b> that the audit committee:</p> <ul style="list-style-type: none"> <li>annually assesses the need for an internal audit, and in such case, makes recommendations on selecting, appointing and removing the head of the internal audit function and on the budget of the internal audit function;</li> <li>ensures that where an internal audit has been established there is a functional description for this which has been approved by the board of directors;</li> <li>ensures that where an internal audit has been established it is supplied with sufficient resources and skills to be able to perform the task, and;</li> <li>monitors the executive board's follow-up on the conclusions and recommendations of the internal audit function.</li> </ul>	Complied with	<p>The Supervisory Board has set up an internal audit function, and an annual assessment of internal audit is performed in connection with a meeting with the external audit, to include a review of the function description for external audit and that the internal audit is supplied with sufficient resources.</p> <p>The Audit Committee and the Supervisory Board monitor the Executive Board's following up on the opinions and recommendations of the internal audit.</p>		Terms of reference of the Audit Committee
<p>3.4.6. It is <b>recommended</b> that the board of directors establish a <u>nominating committee</u> with at least the following preparatory tasks:</p> <ul style="list-style-type: none"> <li>describe the qualifications required by the board of directors and the executive board and for a specific membership position, state the time expected to be spent on the tasks of the post, as well as assess the competences, knowledge and experience of the two governing bodies;</li> <li>annually assess the structure, size, composition and results of the board of directors and the executive board, as well as recommend any changes to the board of directors;</li> <li>annually assess the competences, knowledge experience and succession of the individual members of management, and report to the board of directors in this respect;</li> <li>nominate candidates for the board of directors and the executive board;</li> <li>propose an action plan to the board of directors on the future composition of the board of directors, including proposals for specific changes.</li> </ul>	Explained  Complied with	<p>The regulations for nomination and selection of members of the Supervisory Board and its composition are prescribed in the ATP Act.</p> <p>In connection with the Supervisory Board's self-assessment, an assessment is performed of both qualifications, knowledge and experience, as well as an assessment of Group Management. In addition, the Executive Committee and the Supervisory Board annually discuss the composition, development, risks and succession plans of the Group Management, and the Supervisory Board approves succession plans for the Group Management.</p>		Rules of Procedure of the board of directors

Recommendation	Complied with or explained	Documentation /reference	Traffic lights	Publication
<p>3.4.7. It is <b>recommended</b> that the board of directors establish a <u>remuneration committee</u> with at least the following preparatory tasks:</p> <ul style="list-style-type: none"> <li>to recommend the remuneration policy (including “General guidelines for incentive-based remuneration”) to the board of directors and the executive board for approval by the board of directors prior to approval by the annual general meeting;</li> <li>to make proposals to the board of directors on remuneration for members of the board of directors and the executive board, as well as ensure that the remuneration is in compliance with the company's remuneration policy and the assessment of the performance of the persons concerned. The committee should have information about the total amount of remuneration that members of the board of directors and the executive board receive from other companies in the group</li> <li>to recommend a remuneration policy applicable for the company in general, and;</li> <li>assist in preparing the annual remuneration report.</li> </ul>	Complied with	<p>The Supervisory Board has created a Remuneration Committee whose tasks are performed by the Executive Committee, since ATP is subject to a number of enhanced remuneration regulations similar to those applying to financial undertakings, cf. ATP's remuneration regulation.</p> <p>The Supervisory Board recommends the remuneration policy for approval by the Board of Representatives, to include regulations governing variable remuneration.</p> <p>The Remuneration Committee ensures and controls compliance with the remuneration policy and participates in recommending fees for members of the Board of Representatives, the Supervisory Board and any Supervisory Board committees, remuneration for the CEO, the Chief Actuary and the Chief Auditor and other members of ATP's Group Management.</p>		<p>Website Annual report ATP's remuneration policy Procedures of the Executive Committee</p>
<p>3.4.8. It is <b>recommended</b> that the remuneration committee do not consult with the same external advisers as the executive board of the company.</p>	Complied with  Explained	<p>In connection with the performance of certain tasks, the Remuneration Committee is assisted by an external advisor. The external advisor in question can also perform tasks for the Executive Board. In such a case, these will not be tasks of a nature similar to those performed by the Remuneration Committee. In case of a conflict of interest arising, the Remuneration Committee is able to use an alternative advisor.</p>		<p>Website Annual Report ATP's Pay Policy Rules of Procedure of the Executive Committee</p>
<b>3.5. Evaluation of the performance of the board of directors and the executive board</b>				
<p>3.5.1. It is <b>recommended</b> that the board of directors determine an evaluation procedure for annual evaluation of the overall board of directors and the individual members. External assistance should be employed at least every three years. The evaluation should include an evaluation of:</p> <ul style="list-style-type: none"> <li>contribution and results;</li> </ul>	Complied with  Explained	<p>Self-assessment has been established as a task for the Supervisory Board in its Rules of Procedure. External assistance for Supervisory Board self-assessment is used at least every three years.</p> <p>The Supervisory Board performs and annual self-assessment, to include whether the Supervisory Board possesses the required knowledge and</p>		<p>Annual report Rules of Procedure of the board of directors</p>

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<ul style="list-style-type: none"> <li>• collaboration with the executive board;</li> <li>• the chairman's leadership of the board of directors;</li> <li>• the composition of the board of directors (including competences, diversity and number of members);</li> <li>• the work in committees and the structure of committees, and;</li> <li>• the planning of work and the quality of materials provided to the board of directors.</li> </ul> <p>The evaluation procedure and general conclusions should be included in the management's review and be available on the company's website. The Chairman should provide a statement regarding the executive board evaluation, including the procedure and general conclusions, at the annual general meeting prior to elections for the board of directors.</p>		<p>experience, regarding the contribution and results of the entire Supervisory Board and individual members, and regarding the collaboration with the CEO. The general conclusions of the self-assessment are included in the management review.</p> <p>As the ATP Board of Representatives does not elect the Supervisory Board, there is no statement regarding the assessment of the Supervisory Board made at ATP's Board of Representatives meeting.</p>		
<p>3.5.2. It is <b>recommended</b> that at least once every year the board of directors evaluates the work and performance of the executive board in accordance with pre-defined clear criteria. In addition, the board of directors should consider the need for changes to the structure and composition of the executive board with a view to the company's strategy.</p>	Complied with	<p>The Executive Committee and Supervisory Board annually consider the composition of the Group Management as well as composition, developments, risks and succession plans. Also included in the annual self-assessment is an assessment of the Group Management's work and results, and the Supervisory Board also annually considers a Group Management succession plan.</p>		
<p>3.5.3. It is <b>recommended</b> that the executive board and the board of directors establish a procedure according to which their cooperation is evaluated annually through a formalised dialogue between the chairman of the board of directors and the chief executive officer and that the outcome of the evaluation be presented to the Supervisory board of directors.</p>	Complied with	<p>The collaboration is assessed in connection with the self-assessment and the annual assessment as to whether the CEO is performing his tasks in a satisfactory way and via ongoing dialogue between the Chairman of the Supervisory Board and the CEO.</p>		
<b>4. Remuneration of management</b>				
4.1. Form and content of the remuneration policy				

Recommendation	Complied with or explained	Documentation /reference	Traffic lights	Publication
<p>4.1.1. It is <b>recommended</b> that the board of directors prepare a remuneration policy for the board of directors and the executive board that includes</p> <ul style="list-style-type: none"> <li>• a detailed description of the components of the remuneration for members of the board of directors and the executive board;</li> <li>• the reasons for choosing the individual components of the remuneration;</li> <li>• a description of the criteria on which the balance between the individual components of the remuneration is based, and;</li> <li>• a statement for the connection between the remuneration policy and the company's long-term value creation and relevant targets.</li> </ul> <p>The remuneration policy should be approved by the annual general meeting every four years as a minimum and for every major change and published on the company's website.</p>	Complied with	<p>ATP is subject to a number of enhanced remuneration regulations similar to financial undertakings, cf. ATP's remuneration regulations, which include the same requirements as the recommendations.</p> <p>The Supervisory Board has determined a pay policy in accordance with ATP's remuneration regulations, audited annually, approved by ATP's Board of Representatives and published at ATP.dk</p>		Website ATP'S Pay Policy
<p>4.1.2. It is <b>recommended</b> that, if the remuneration policy includes variable components,</p> <ul style="list-style-type: none"> <li>• limits be set on the variable components of the total remuneration package;</li> <li>• a reasonable and balanced link be ensured between remuneration for members of management and the value creation for shareholders in the short and long term;</li> <li>• there be clarity about performance criteria and measurability for award of variable components;</li> <li>• it is ensured that variable remuneration does not only consist of short-term remuneration components and that long-term remuneration components have an accrual or maturation period of at least three years, and;</li> <li>• it is ensured that the company can claim full or partial repayment of variable components of remuneration that were paid on the basis of data which proved to be misstated.</li> </ul>	Complied with	<p>ATP is subject to a number of enhanced remuneration regulations similar to financial undertakings, cf. ATP's remuneration regulations, which include the same requirements as the recommendations.</p> <p>The Supervisory Board, the CEO, members of Group Management, the Chief Actuary, the Chief Auditor and key individuals responsible for the Actuary Function, the Risk Management Function, the Internal Audit Function and the Compliance Function do not receive variable remuneration components.</p>		Website ATP'S Pay Policy Statement regarding remuneration in ATP

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4.1.3. It is <b>recommended</b> that remuneration of members of the board of directors does not include share options or subscription options.	n/a			
4.1.4. It is <b>recommended</b> that if equity-based remuneration is used in connection with long-term incentive programmes, the programmes should have an accrual or off-setting period of at least three years after allocation and be revolving, i.e. with periodic allocation.	Complied with			ATP's Pay Policy
4.1.5. It is <b>recommended</b> that the total value of remuneration for the termination period including severance pay does not exceed two years' remuneration including all remuneration components.	Complied with			ATP's Pay Policy
<b>4.2. Disclosure regarding remuneration</b>				
4.2.1. It is <b>recommended</b> that the company's remuneration policy and compliance with this policy be explained and justified annually in the Chairman's statement at the company's annual general meeting.	Complied with	The Board of Representatives receives an annual statement from the chairman regarding the remuneration of the Board of Representatives and the Supervisory Board, and this also submitted to the Minister for Employment. The Board of Representatives also approves ATP's pay policy in accordance with ATP's remuneration regulations.		ATP's Pay Policy
4.2.2. It is <b>recommended</b> that the proposed remuneration for the board of directors for the current financial year be approved by the shareholders at the annual general meeting.	Complied with	ATP is subject to a number of enhanced remuneration regulations in line with those that apply to financial undertakings, cf. ATP's remuneration regulations. The Board of Representatives approves the Supervisory Board's remuneration.		

Recommendation	Complied with or explained	Documentation /reference	Traffic lights	Publication
<p>4.2.3. It is <b>recommended</b> that the total remuneration granted to each member of the board of directors and the executive board by the company and other companies in the group and associates in the past three years, including information on the most important contents of retention and retirement/resignation schemes, be disclosed in the annual report and that the link with the remuneration and the company's strategy and relevant objectives be explained. The remuneration report should be published on the company's website.</p>	Complied with	Information is provided regarding total remuneration for each individual member of the Board of Representatives, the Supervisory Board, the CEO and Group Management members in the annual report. The information is stated for the five most recent years.		Annual Report Website ATP'S Pay Policy Statement regarding remuneration in ATP
<b>5. Financial reporting, risk management and audits</b>				
<i>5.1. Identification of risks and transparency about other relevant information</i>				
<p>5.1.1. It is <b>recommended</b> that the board of directors consider and in the management review account for the most important strategic and business-related risks, risks in connection with financial reporting as well as for the company's risk management.</p>	Complied with	The most important strategic and business risks are discussed in the annual report under risk and financial condition.		Annual Report Report on risk and financial condition (SFCR)
<i>5.2. Whistleblower scheme</i>				
<p>5.2.1. It is <b>recommended</b> that the board of directors establishes a whistleblower scheme to enable appropriate and confidential reporting of serious wrongdoing or suspicion of same.</p>	Complied with	The Supervisory Board has established a whistleblower scheme for current and previous employees of the ATP Group in accordance with the requirements of the ATP Act.		
<i>5.3. Contact to auditor</i>				
<p>5.3.1. It is <b>recommended</b> that the board of directors ensures regular dialogue and exchange of information between the auditor and the board of directors, including that the board of directors and the audit committee at least once a year meet with the auditor without the executive board being present. This also applies to the internal auditor, if any.</p>	Complied with	Both the internal and the external auditor participate in meetings with the Supervisory Board, and the Audit Committee participates in meetings with both the external auditor and the internal auditor without the CEO being present.		

Recommendation	Complied with or explained	Documentation /reference	Traffic lights	Publication
5.3.2. It is <b>recommended</b> that the audit agreement and auditors' fee be agreed between the board of directors and the auditor on the basis of a recommendation from the audit committee.	Complied with	The audit engagement letter (audit agreement) is subject to EU Public Procurement Regulations and, accordingly, to prohibition on negotiation. The Board of Representatives approves the selection of auditor. The Audit Committee and the Supervisory Board follow up on audit-related and non-audit-related services from the external auditor, including auditor's fees.		Website Terms of reference of the Audit Committee