

Remuneration report

ATP's Supervisory Board and Board of Representatives have established a Pay Policy with rules governing remuneration and a number of associated disclosure obligations that resemble the rules applicable to the financial sector.

PURPOSE OF ATP'S PAY POLICY

The overall purpose of the Pay Policy is to support ATP's vision of safeguarding the basic financial security for members in the longer term via, amongst others, high returns and simple administration.

The Pay Policy also serves to support ATP's business model and commercial objectives, including making it possible, by means of a suitable remuneration structure, to attract and retain the best possible competencies on competitive terms of employment, so that ATP's ambitious, long-term performance targets can be achieved.

All members of ATP's Board of Representatives, Supervisory Board and Supervisory Board committee, the CEO and members of the Group Management as well as the Chief Actuary, the Chief Compliance Officer and the Chief Auditor receive fixed remuneration only. Members of the Group Management receive fixed remuneration, pension contribution of up to 18 per cent and a number of work-related employee benefits, including a company car.

Principal contents of severance schemes

Under their contracts, each member of the Group Management has 12 month's notice. The CEO (Chief Executive Officer) has 12 months' notice. In addition, when stepping down after 12 and 17 years there is, respectively, given 1 and 3 month's salary, though the termination period and any potential severance pay package can at most amount to 24 months of salary.

Remuneration and performance-related pay at ATP

There are two overall principles which ensure that determination of the performance-related pay programmes and the payment of performance-related pay are safely executed:

- No individual is involved in making recommendations or design of performance-related pay schemes applicable to themselves.
- It is independently checked that the programmes are managed in accordance with the determined frameworks.

ATP's Supervisory Board defines general frameworks for the performance-related pay schemes in ATP, including:

- Groups of employees who are included;
- Types of performance-related pay schemes;
- The expected value of the schemes at the time of allocation;
- The timeframe over which the various schemes are calculated;
- The maximum annual bonus for the various groups of employees.

The Supervisory Board has decided that ATP's CEO and Group Management, the Chief Actuary, Chief Risk Officer, Chief Internal Auditor, Chief Compliance Officer, Chief Operating Officer in Pensions & Investments, Head of Risk and Valuation Models, Head of the Pensions & Investments Unit who are tasked with ensuring compliance with the limits for risk taking and the employees in Investments that have the power to make decisions on individual investments or who have a deciding influence on strategy investment decisions are to be classified as significant risk takers.

The Supervisory Board has also determined that the ceiling for variable pay elements for performance-related schemes cannot exceed 100 per cent of the base salary including pension contribution per year. The specific execution of frameworks will be determined by the CEO (Chief Executive Officer) and the CIO (Chief Investment Officer).

The remuneration structure consists of a fixed salary and potentially a performance-related pay component (performance-related pay) the purpose of which is to support business development via a focus on target and results management. In Pensions & Investments, Portfolio Managers in ATP's investment department (Investments) may be able to supplement their fixed salary with a performance-related bonus, and this extends also to investment specialists and employees of a range of ATP's subsidiaries.

Group Management remuneration in 2022

DKKm	2022	2021	2020	2019	2018
Group Management end of year 2022					
Martin Præstegaard, CEO (Chief Executive Officer) ¹	3.5	-	-	-	-
Martin Præstegaard, Deputy CEO and Chief Financial Officer (CFO) ¹	2.3	4.4	3.6	1.3	-
Mikkel Svenstrup, Chief Investment Officer (CIO)	4.5	4.3	3.3	-	-
Kim Kehlet Johansen, Executive Vice President, Pension, Risk Management & Compliance, Chief Risk Officer (CRO)	4.3	4.0	3.9	3.6	0.9
Anne Kristine Axelsson, Executive Vice President, Pension & Social Security	2.8	2.8	2.7	2.7	1.8
Kristine Stenhuus, Group CEO, Udbetaling Danmark – Public Benefits Administration ²	0.4	-	-	-	-
Haktan Bulut, Chief Information and Technology Officer ³	0.7	-	-	-	-
Departed Group Management end of year 2022					
Bo Foged, CEO (Chief Executive Officer) ⁴	4.7	7.3	7.6	6.9	4.6
Carsten Bodal, Executive Vice President, Udbetaling Danmark ⁵	5.9	2.7	2.7	2.6	1.7
Annette Moesgaard, Executive Vice President, Communication & External Relations	-	3.7	2.0	1.9	1.9
Kasper Ahrndt Lorenzen, Chief Investment Officer	-	-	-	3.8	4.2
Christian Hyldahl, CEO (Chief Executive Officer)	-	-	-	(0.7)	13.9
Mads Smith Hansen, Executive Vice President, Chief Risk Officer	-	-	-	-	4.1
Lilian Mogensen, Executive Vice President, Processing Business	-	-	-	-	7.2
Dewi Dylander, Deputy Executive Director, Legal	-	-	-	-	0.7
Bård Grande, Chief HR Officer	-	-	-	-	0.8
Total Group Management ⁶	29.1	29.2	25.8	22.1	41.8

¹ CFO 2022, became CEO on 1 July 2022, CFO throughout 2022

² Started on 15 November 2022

³ Started on 1 October 2022

⁴ CEO 18 June 2019-30 June 2022

⁵ Stepped down from role in Group Management on 30 September 2022. In 2022, remuneration includes garden leave and severance pay.

⁶ Members of the Group Management are remunerated by a fixed salary, pension contribution and a number of work-related benefits including a company car.

No Group Management member receives any form of variable pay or incentive schemes.

Group Management remuneration in 2022

Total remuneration for the Group Management in 2022 was DKK 29.1 million, which is a decrease of DKK 0.1 million compared to 2021. This is due to several contradictory factors, mainly due to changes to the composition of the management team.

Bo Foged stepped down as CEO (Chief Executive Officer) on 30 June and Martin Præstegaard assumed the role of CEO on 1 July coming from a role as ATP's CFO and deputy CEO. Pernille Vastrup assumed the role of new CFO on 1 April 2023.

The Group Management was also changed by Carsten Bodal being replaced by Kristine Stenhuus, who on 15

November became the new Executive Vice President for Udbetaling Danmark - Public Benefits Administration.

In order to strengthen the focus on digitalisation and IT in the organisation, the Group management team was supplemented with a Chief Information and Technology Officer (CITO) named Haktan Bulut who stepped in to the role on 1 October.

The Communications Director is also no longer part of the Group Management.

CEO/Worker pay ratio¹

	2022	2021	2020 ²	2019	2018
ATP Group, including business processing, external parties:					
CEO/Worker pay ratio for all employees	12	12	11	11	13
ATP Group, excluding business processing, external parties:					
CEO/Worker pay ratio for ATP Livslang Pension (Lifelong Pension)	8	8	8	8	9

¹ Definition: CEO remuneration divided by average remuneration per employee

² CEO/Worker pay ratio for 2020 is calculated exclusive of the CEO's frozen holiday pay

CEO Worker pay ratio

The purpose of the key figure CEO/Worker pay ratio is to show the pay ratio between CEO and employees and to show the development in pay for the CEO compared to the employees.

In ATP, the key figure is a factor 12 for 2022, meaning that the remuneration of the CEO corresponds to 12 times the average pay of all employees in ATP. This includes employees carrying out administrative tasks for external parties. In 2021, ATP had temporary employees to manage corona-related tasks such as infection tracing and this reduced the average salary temporarily in 2021. The average salary is rising again in 2022, though not to the same level as before

the infection tracing tasks as ATP has also increased the number of young temporary employees working in a service team with customer service tasks during their sabbatical year. All in all, this ratio has decreased slightly compared to 2021.

When considering ATP Livslang Pension (Lifelong Pension) and the associated employees in isolation, and in order for the key figures to be comparable to other pension funds, the key figure is a factor 8, meaning that the remuneration of the CEO corresponds to 8 times the average pay of employees. The ratios are similar to last year.

Portfolio employees in Investments

DKKm	2022	2021	2020	2019	2018
Fixed remuneration	97.4	96.2	86.1	75.4	76.8
Variable remuneration	7.5	13.3	9.9	8.1	6.0
Variable remuneration, prior year adjustment	0.0	0.1	0.2	0.4	(0.6)
Total remuneration	104.9	109.6	96.2	83.9	82.2
Number of recipients of fixed salary	60	52	46	43	46
Of which recipients of variable salary	31	28	24	21	23

Portfolio employees in Investments

Variable pay consists of variable pay during the financial year and provisional bonus by the end of the financial year. Final bonus determination does not take place until Q1 of the following

financial year. The difference between provisional bonus and final bonus is recognised under "Variable remuneration, prior year adjustment".

Remuneration paid to ATP's Supervisory Board and Board of Representatives

DKKm	2022	2021	2020	2019	2018
Total remuneration for the ATP Supervisory Board	2.2	2.1	2.1	2.1	2.0
Total remuneration for ATP's Board of Representatives	0.3	0.3	0.2	0.2	0.2
Total remuneration for ATP's Executive Committee	0.3	0.3	0.3	0.3	0.2
Total remuneration for the ATP Audit Committee	0.3	0.3	0.2	0.3	0.2
Total remuneration paid to the ATP Risk Committee	0.3	0.3	0.2	0.3	0.2
Annual remuneration in DKK '000 for:					
Chairman of the Supervisory Board (total remuneration)	825	802	785	768	715
Member of the Executive Committee	92	90	88	86	80
Member of the Supervisory Board (including remuneration for the Board of Representatives)	138	135	132	129	120
Member of the Board of Representatives	15	15	14	14	13
Chairman of the Audit Committee	90	88	86	84	60
Member of the Audit Committee	69	67	66	64	60
Member of the Risk Committee	69	67	66	64	60

Remuneration for the ATP Supervisory Board

DKK '000	Supervisory Board	Executive Committee	Audit Committee	Risk tee	Total 2022	2021	2020	2019	2018
Chairman of the Supervisory Board:									
Torben M. Andersen	594	92	69	69	825	802	785	768	643
Jørgen Søndergaard	-	-	-	-	-	-	-	-	74
Employer representatives:									
Jacob Holbraad	138	92	69	-	300	294	298	279	260
Lars Sandahl Sørensen	138	-	-	-	138	135	132	47	-
Anne Broeng	138	-	-	69	208	202	198	193	180
Brian Mikkelsen	138	-	-	-	138	135	99	-	-
Vibeke Krag	138	-	-	69	208	202	33	-	-
Mogens Nørgård ¹	104	-	-	-	104	-	-	-	-
Peter Rahbæk Juel ²	35	-	-	-	35	135	132	96	-
Torben Dalby Larsen	-	-	-	-	-	-	33	129	120
Kim Graugaard	-	-	-	-	-	-	-	80	120
Anne Jæger	-	-	-	-	-	-	118	268	180
Martin Damm	-	-	-	-	-	-	-	32	90
Bent Hansen	-	-	-	-	-	-	-	-	30
Employee representatives:									
Lizette Risgaard*	138	92	69	-	300	292	285	279	260
Bente Sorgenfrey*	138	-	-	-	138	135	132	129	120
Jonas Schytz Juul*	138	-	-	-	138	45	-	-	-
Anja C. Jensen* ³	127	-	-	-	127	-	-	-	-
Lisbeth Lintz* ⁴	125	-	-	-	125	-	-	-	-
Jan Walther Andersen	138	-	90	69	298	279	198	193	180
Arne Grevsen	0	-	-	-	0	67	132	129	120
Kim Simonsen	0	-	-	-	0	112	132	129	120
Lars Qvistgaard	0	-	-	-	0	135	132	129	120
Total	2,230	277	298	277	3,082	2,968	2,837	2,880	2,617

¹ Joined 1 April 2022

² Left 30 March 2022

³ Joined 31 January 2022

⁴ Joined 7 February 2022

* Remuneration is paid to the organisation that has nominated the Board member