

COMMUNICATION ON PROGRESS
QUESTIONNAIRE

BankInvest

No. of questions

45/45



R2. What is the time period covered by your Communication on Progress? (MM/YYYY - MM/YYYY)

Please share the date range of the reporting period used for the Communication on Progress option you select. [\(i\)](#)

01/2024 - 12/2024

R3. (Optional) Please clarify the scope of reporting covered by your Communication on Progress. For example, please describe the operational scope of your CoP, (e.g., corporate office, investments, subsidiaries) as needed. [\(i\)](#)

Covers BI Holding A/S

R5. (Optional) Please upload the sustainability report for your company

(Uploaded file cannot exceed 50MB)

BANKINVEST_CSR-RAPPORT-2024.PDF

CEO Statement of Continued Support

CEO Statement of Continued Support

To our stakeholders,

I am pleased to confirm that BankInvest reaffirms its support of the Ten Principles of the United Nations Global Compact in the areas of Human Rights, Labour, Environment, and Anti-Corruption.

In this annual Communication on Progress, we disclose our continuous efforts to integrate the Ten Principles into our business strategy, culture, and daily operations, and contribute to United Nations goals, particularly the Sustainable Development Goals.

Sincerely yours,

C1. Please complete the following information:

CEO/Highest-level executive name:

Lotte Måansson

CEO/Highest-level executive full title:

CEO

Company name:

BankInvest

C2. Please confirm:

I am the CEO or highest-level executive.

I have received permission to sign on behalf of the CEO or highest-level executive.

C2.1. If applicable, form completed on behalf of the CEO or highest-level executive by:

Cecilie Hvid Nesevski

Success Stories & Future Priorities

S2. Which of the five issue areas does the company plan to prioritize in the next two years?

(Select all that apply) [\(i\)](#)

Governance

Human Rights

Labour

Environment

Anti-Corruption

None

Governance

Policies and Responsibilities ^

G1. Does the board/highest governance body or most senior executive of the company:

(Select all that apply) ⓘ

<input checked="" type="checkbox"/>	Issue an annual statement about the relevance of sustainable development to the company
<input checked="" type="checkbox"/>	Issue an annual statement that addresses impacts on both people and the environment
<input type="checkbox"/>	Issue an annual statement highlighting a zero tolerance for corruption
<input checked="" type="checkbox"/>	Sign off on organizational sustainability targets
<input checked="" type="checkbox"/>	Supervise Environmental, Social, and Governance reporting
<input checked="" type="checkbox"/>	Regularly review potential risks related to the business model
<input type="checkbox"/>	None of the above

G2. Does the company have a code of conduct in place regarding each of the following sustainability topics?

(Select one answer option per line) ⓘ

	No, this is not a current priority	No, but we plan to within the next two years	Yes, focused on employees	Yes, focused on employees and suppliers	Yes, focused on our own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)
Human Rights	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labour Rights/Decent Work	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

G3. Has the company appointed an individual or group responsible for each of the following sustainability topics?

(Select one answer option per line) [\(i\)](#)

	No one is specifically responsible for this topic	Yes, with limited influence on outcomes (e.g., limited access to internal information, limited decision-making authority)	Yes, with moderate influence on outcomes (e.g., has access to relevant information, reports to senior manager)	Yes, with direct influence of some outcomes (e.g., has access to relevant information, includes one or more senior manager with decision making rights)	Yes, with direct influence at the highest levels of the company (e.g., has access to relevant information, includes most senior members of company)
Human Rights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Labour Rights/Decent Work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

No one is specifically responsible for this topic	Yes, with limited influence on outcomes (e.g., limited access to internal information, limited decision-making authority)	Yes, with moderate influence on outcomes (e.g., has access to relevant information, reports to senior manager)	Yes, with direct influence of some outcomes (e.g., has access to relevant information, includes one or more senior manager with decision making rights)	Yes, with direct influence at the highest levels of the company (e.g., has access to relevant information, includes most senior members of company)
Environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

G3.1. If yes, does the company also have formal governance structures (e.g., committees or governance bodies) in place to provide strategic oversight and support for these sustainability topics?

(Select one answer option per line) ⁱ

No formal structure	Yes, with limited influence on outcomes (e.g., limited access to internal information necessary to understand risks, poor representation from relevant departments or functions)	Yes, with moderate influence on outcomes (e.g., includes representatives of some functions, departments, or business units most relevant for addressing the risks concerned, has access to relevant information, reports to senior manager)	Yes, with direct influence on some outcomes (e.g., includes representatives of functions, departments, or business units most relevant for addressing the risks concerned, has access to relevant information, reports to senior manager)	Yes, with direct influence at the highest level of the company (e.g., full access to relevant information, involves members at highest level of company)
Human Rights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Labour Rights / Decent Work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Prevention

G4. Does the company have a process to identify, assess and mitigate risks related to the following sustainability topics?

(Select one answer option per line)ⁱ

	No, this is not a current priority	No, but we plan to within the next two years	Yes, conducted by a designated individual or group	Yes, engaging employees across the company	Yes, engaging employees and business partners	Yes, engaging employees, business partners and external stakeholders
Human rights risks	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labour rights risks	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental risks	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Corruption risks	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

G5. Does the company have a due diligence process through which it identifies, prevents, mitigates and accounts for actual and potential negative impacts on sustainability topics?

(Select one answer option per line)ⁱ

	No, this is not a current priority	No, but we plan to within the next two years	Yes, related to our own operations	Yes, related to our own operations and suppliers	Yes, related to our own operations and the value chain (including suppliers, consumers, communities, other business relationships)
Human rights risks	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labour rights risks	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental risks	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Corruption risks	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Concerns and Grievance Mechanisms



G6. Does the company have a process(es) through which members of the company's workforce can raise concerns about the company's conduct on sustainability topics?

(Select one answer option per line) ⁱ

	No, this is not a current priority	No, but we plan to within two years	Yes, we have an informal process (e.g., through supervisors, others)	Yes, we have a formal process
Human Rights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>
Labour Rights / Decent Work	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>

No, this is not a current priority	No, but we plan to within two years	Yes, we have an informal process (e.g., through supervisors, others)	Yes, we have a formal process
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

G6.1. Please provide additional detail regarding the process(es) the company has through which members of the company's workforce can raise concerns about the company's conduct.

(Select one answer option per line)⁽ⁱ⁾

	Yes	No
Is the process communicated to all employees/workers in local languages?	<input checked="" type="radio"/>	<input type="radio"/>
Is the process available to non-employees (e.g., suppliers, consumers, communities, and other business relationships)?	<input type="radio"/>	<input checked="" type="radio"/>
Is the process confidential (e.g., whistleblowing process)?	<input checked="" type="radio"/>	<input type="radio"/>
Are there processes in place to avoid retaliation?	<input checked="" type="radio"/>	<input type="radio"/>
Can concerns be raised about suppliers or other business relationships (e.g., clients, partners, etc.)?	<input checked="" type="radio"/>	<input type="radio"/>
Other (Please provide additional information)	<input type="radio"/>	<input checked="" type="radio"/>

Tracking Action Effectiveness



G7. How does the company track the effectiveness of its actions, and the related impacts, of the following sustainability topics?

(Select one answer option per line) 

	No actions and related impacts are systematically tracked	Conducts investigation reviews of incidents on an as-needed basis	Conducts investigation/review of incidents and changes organizational policies, processes, and practices accordingly	Conducts investigation reviews and leverages learnings to influence both internal and external affairs
Human Rights	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labour Rights/Decent Work	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Anti-Corruption	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Executive Pay

G8. Is executive pay linked to performance on one or more of the following sustainability topics?

(Select one answer option per line) 

	No, this is not a current priority	No, but we plan to within the next two years	Yes
Human Rights	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Labour Rights / Decent Work	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

	No, this is not a current priority	No, but we plan to within the next two years	Yes
Anti-Corruption	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Leadership Composition



G9. Please provide details regarding the company's board/highest governance body.ⁱ

(Please enter only whole numbers rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros. For 'Male, Female, Other', 'Under 30 years old, 30-50 years old, Above 50 years old' and 'Executive, Independent' please enter only whole numbers from 0 to 100, inclusive ensuring the values in the column sum to 100 to move on.)

(Text box with option for 'Not applicable')

	Known	Number (Please input a whole number)	Not applicable
Total number of board members (#)	<input checked="" type="radio"/>	8	<input type="radio"/>

	Known	Number (Please input a whole number e.g., 50% = 50)	Not applicable
Male (%)	<input checked="" type="radio"/>	75	<input type="radio"/>

	Known	Number (Please input a whole number e.g., 50% = 50)	Not applicable
Female (%)	<input checked="" type="checkbox"/>	<input type="text" value="25"/>	<input type="radio"/>
Other (%)	<input checked="" type="checkbox"/>	<input type="text" value="0"/>	<input type="radio"/>

	Known	Number (Please input a whole number e.g., 50% = 50)	Not applicable
Under 30 years old (%)	<input checked="" type="checkbox"/>	<input type="text" value="0"/>	<input type="radio"/>
30-50 years old (%)	<input checked="" type="checkbox"/>	<input type="text" value="25"/>	<input type="radio"/>
Above 50 years old (%)	<input checked="" type="checkbox"/>	<input type="text" value="75"/>	<input type="radio"/>

	Known	Number (Please input a whole number e.g., 50% = 50)	Not applicable
From minority or vulnerable groups (%)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

	Known	Number (Please input a whole number e.g., 50% = 50)	Not applicable
Executive (%)	<input checked="" type="radio"/>	<input type="text" value="100"/>	<input type="radio"/>
Independent (%)	<input checked="" type="radio"/>	<input type="text" value="0"/>	<input type="radio"/>

G10. Within the reporting period, what was the percentage of women in managerial positions?

(Select one answer option per line, if 'Known', include the value. Please enter only whole numbers from 0 to 100, inclusive, rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros.) 

	Known	Percentage of women (%) (Please input a whole number e.g., 50% = 50)	Unknown
Managerial positions	<input checked="" type="radio"/>	<input type="text" value="45"/>	<input type="radio"/>

G11. What is the gender representation of the company's C-suite or equivalent executive leadership positions?

(Select all that apply for each line)ⁱ

	Women	Men	Other (e.g., non-binary)	Not applicable (e.g., the company does not have this position)	Choose not to disclose
Chief Executive Officer	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chief Financial Officer	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chief Procurement Officer	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief Technology Officer	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chief Marketing Officer	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Chief Operations Officer	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chief Sustainability Officer	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chief Legal Officer/General Counsel	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chief Human Resources Officer	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other (Please provide additional information)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

G12. Do you produce sustainability reporting according to:

(Select all that apply) [\(i\)](#)

<input checked="" type="checkbox"/>	National/local regulation on sustainability
<input type="checkbox"/>	Security exchange regulations
<input type="checkbox"/>	Non-Financial Reporting Directive of the European Union (NFRD)/Corporate Sustainability Reporting Directive (CSRD)
<input type="checkbox"/>	Global Reporting Initiative (GRI)
<input type="checkbox"/>	Sustainability Accounting Standards Board (SASB, now consolidated into the IFRS Foundation)
<input type="checkbox"/>	International Integrated Reporting Council (IIRC, now consolidated into the IFRS Foundation)
<input type="checkbox"/>	Climate Disclosure Standards Board (CDSB, now consolidated into the IFRS Foundation)
<input checked="" type="checkbox"/>	Task Force on Climate-related Financial Disclosures (TCFD)
<input type="checkbox"/>	Carbon Disclosure Project (CDP)
<input type="checkbox"/>	Science Based Targets initiative (SBTi)
<input checked="" type="checkbox"/>	Other voluntary frameworks (Please provide additional information)
<input type="checkbox"/>	No sustainability reporting according to any frameworks nor regulations outside of this Communication on Progress

G12A. (Optional) Please provide additional information:

SFDR

G12A. Other voluntary frameworks (Please provide additional information):

Nordic Swan Ecolabel

G13. Is some or all of the information disclosed in this questionnaire assured by a third-party?

(Select one that applies) 

Yes

No

Human Rights and Labour

Materiality



HR/L1. Which of the following has the company identified as material human and labour rights topics connected with its operations and/or value chain?

(Select all that apply) 

Freedom of association and the right to collective bargaining

<input checked="" type="checkbox"/>	Child labour
<input checked="" type="checkbox"/>	Forced labour
<input checked="" type="checkbox"/>	Non-discrimination in respect of employment and occupation
<input checked="" type="checkbox"/>	Safe and healthy working environment
<input checked="" type="checkbox"/>	Wages
<input checked="" type="checkbox"/>	Working hours
<input checked="" type="checkbox"/>	Gender equality and women's rights
<input checked="" type="checkbox"/>	Freedom of expression
<input checked="" type="checkbox"/>	Digital security and privacy
<input type="checkbox"/>	Product and service end-user rights
<input type="checkbox"/>	Security arrangements
<input type="checkbox"/>	Right to clean and healthy environment: pollution, water, air, and land
<input type="checkbox"/>	Land rights and rights of Indigenous Peoples
<input checked="" type="checkbox"/>	Rights of vulnerable groups and minorities
<input type="checkbox"/>	Raw material sourcing
<input type="checkbox"/>	Other

HR/L1.1. From the identified topics, please select up to six that are considered most material to the company's operations and/or its value chain.
(Select all that apply, maximum six)

<input checked="" type="checkbox"/>	Freedom of association and the right to collective bargaining
<input checked="" type="checkbox"/>	Child labour
<input checked="" type="checkbox"/>	Forced labour
<input checked="" type="checkbox"/>	Non-discrimination in respect of employment and occupation
<input checked="" type="checkbox"/>	Safe and healthy working environment
<input checked="" type="checkbox"/>	Wages
<input type="checkbox"/>	Working hours
<input type="checkbox"/>	Gender equality and women's rights
<input type="checkbox"/>	Freedom of expression
<input type="checkbox"/>	Digital security and privacy
<input type="checkbox"/>	Product and service end-user rights
<input type="checkbox"/>	Security arrangements
<input type="checkbox"/>	Right to clean and healthy environment: pollution, water, air, and land
<input type="checkbox"/>	Land rights and rights of Indigenous Peoples
<input type="checkbox"/>	Rights of vulnerable groups and minorities
<input type="checkbox"/>	Raw material sourcing
<input type="checkbox"/>	Other

Commitment



HR/L2. Does the company have a policy commitment in relation to the following human rights & labour rights topics?

(Select one answer option per line, if 'Yes', include the value) [\(i\)](#)

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy	Not applicable (Please provide additional information)	Please input the year the relevant human rights and labour rights policy was last reviewed (YYYY)
Freedom of association and the right to collective bargaining	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	2024
Child labour	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	2024
Forced labour	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	2024
Non-discrimination in respect of employment and occupation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	2024
Safe and healthy working environment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	2024
Gender equality and women's rights	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	2024

No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy	Not applicable (Please provide additional information)	Please input the year the relevant human rights and labour rights policy was last reviewed (YYYY)
<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	2024

HR/L2.1. For each human rights & labour rights policy commitment, is it:

(Select all that apply for each line) ⁽ⁱ⁾

Aligned with international human rights/labour standards	Publicly available	Approved at most senior level of the company	Applied to the company's own operations	Applied to the company's own operations and suppliers	Applied to the company's own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)	Developed involving human rights/labour rights expertise from inside and/or outside the company	Other (Please provide additional information)
Freedom of association and the right to collective bargaining	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Child labour	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Forced labour	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Non-discrimination in respect of employment and occupation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Safe and healthy working environment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Gender equality and women's rights	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Wages	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

HR/L2.2. Does the company's policy on freedom of association and collective bargaining:

(Select all that apply) [\(i\)](#)

<input checked="" type="checkbox"/>	Reference the respect for the right of all workers to form and join a trade union of their choice without fear of intimidation or reprisal and protect workers against acts of anti-union discrimination
<input type="checkbox"/>	Prohibit any acts of interference in trade unions
<input type="checkbox"/>	Facilitate collective bargaining with the trade union representatives
<input type="checkbox"/>	Provide trade union representatives with the information required for meaningful bargaining in the context of bona fide negotiations
<input type="checkbox"/>	Reference the respect for the right of workers to submit grievances without suffering
<input type="checkbox"/>	We do have a policy on freedom of association or collective bargaining but it does not include any of these details

HR/L2.3. Do(es) the existing collective bargaining agreement(s) provide(s) more favourable rights than those provided in legislation, where appropriate?

(Select all that apply) [\(i\)](#)

<input type="checkbox"/>	Yes, by providing more favourable conditions related to wages
<input type="checkbox"/>	Yes, by providing more favourable conditions related to working hours
<input type="checkbox"/>	Yes, by providing more favourable conditions related to health coverage and/or sick leave
<input type="checkbox"/>	Yes, by providing additional rights not otherwise provided (Please provide additional information)
<input checked="" type="checkbox"/>	There is (are) no existing collective bargaining agreement(s)
<input type="checkbox"/>	No

Prevention

HR/L3. Within the reporting period, has the company engaged with potentially affected stakeholders or their legitimate representatives in relation to the following human rights & labour rights topics?

(Select all that apply for each line) [\(i\)](#)

No engagement on this topic	To better understand the risks/ impacts in question	To discuss potential ways to prevent or mitigate the risks/ impacts in question	To agree on a way to prevent/ mitigate the risks/ impacts in question	To assess progress in preventing/ mitigating the risks/impacts in question	To collaborate in the prevention/ mitigation of the risks/ impacts in question
Freedom of association and the right to collective bargaining	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Child labour	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Forced labour	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-discrimination in respect of employment and occupation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Safe and healthy working environment	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gender equality and women's rights	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Wages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

HR/L4. What type of action has the company taken within the reporting period with the aim of preventing/mitigating the risks/impacts associated with the following human rights & labour rights topics?

(Select all that apply for each line) ⁱ

Response and Reporting



HR/L5. Within the reporting period, has the company been involved in providing or enabling remedy where it has caused or contributed to adverse impact(s) associated with the following human rights & labour topic(s)?

(Select one answer per line)

	No adverse impact identified or caused	Yes, adverse impact(s) identified, but no remedy provided/enabled	Yes, adverse impact(s) identified, and remedy provided/enabled	Choose not to disclose
Freedom of association and the right to collective bargaining	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Child labour	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Forced labour	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-discrimination in respect of employment and occupation	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safe and healthy working environment	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Gender equality and women's rights	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wages	<input checked="" type="checkbox"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

HR/L6. What was the average gender pay gap (comparing jobs of equal value) during the reporting period?

(Please enter only whole numbers from 0 to 100, inclusive, rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros.)

Guidance for Gender Pay Gap: For each job level or category, companies are to calculate the gap of gross hourly earnings paid to female and male employees and report the average gap of earnings across job categories as a percentage. Please refer to the CoP guidebook for additional information on the average gender pay gap formula.

Average Gender Pay Gap (%) - (Please input answer as a whole number e.g., 95% = 95)	<input type="text"/>	<input type="radio"/>	<input checked="" type="radio"/>
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HR/L6A. Choose to not disclose (Please provide additional information):

Choose not to disclose

HR/L7. Within the reporting period, what was the rate of recordable work-related accidents for employees? [i](#)

(Please enter only whole numbers, rounded to the nearest whole number. Do not use decimals, commas, fractions, special characters, spaces, or leading zeros.)

Guidance for work-related accidents rate: companies should calculate the work-related accidents rate by dividing the total number of work-related accidents in the reporting year by the total number of hours worked by all employees during the same period. The result should then be multiplied by 200,000. Please refer to the CoP guidebook for additional information on the work-related accidents rate formula.

Rate of work-related accidents (Please input a whole number):	<input type="text" value="0"/>	<input type="radio"/>	<input checked="" type="radio"/>
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Environment

Commitment



E1. Does the company have a policy commitment in relation to the following environmental topics?

(Select one answer per line, if 'Yes', include the value) [\(i\)](#)

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy	Not applicable (Please provide additional information)	Please input the year the relevant environmental policy was last reviewed (YYYY)
Climate change	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	2024
Water	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Oceans	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Nature and biodiversity	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Air pollution	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
Energy & resource use	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	

No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy	Not applicable (Please provide additional information)	Please input the year the relevant environmental policy was last reviewed (YYYY)
<p>Other environmental topic(s) (Please provide additional information)</p> <input checked="" type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>				

E1A. (Optional) Please provide additional information:

Climate targets are part of our CSR-policy. For the remaining topics, we create policies for our value chain, (see our Policy for Responsible Investments)

E1.1. For each environmental policy commitment, is it:

(Select all that apply for each line) [i](#)

Aligned with international environmental standards	Publicly available	Approved at most senior level of the company	Applied to the company's own operations	Applied to the company's own operations and suppliers	Applied to the company's own operations and the value chain (e.g., suppliers, consumers, communities, other business relationships)	Developed involving environmental expertise from inside and/or outside the company	Other (Please provide additional information)
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Climate change

Prevention

E2. Within the reporting period, has the company engaged with potentially affected stakeholders or their legitimate representatives in relation to the following environmental topics?

(Select all that apply for each line) **i**

No engagement on this topic	To better understand the risks/impacts in question	To discuss potential ways to prevent/mitigate the risks/impacts in question	To agree on a way to prevent/mitigate the risks/impacts in question	To assess progress in preventing/mitigating the risks/impacts in question	To collaborate in the prevention/mitigation of the risks/impacts in question	Other (Please provide additional information)
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Energy & resource use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other environmental topic(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

E3. What type of action has the company taken within the reporting period with the aim of preventing/mitigating the risks/impacts associated with the following environmental topics?

(Select all that apply) 

No action within reporting period	Provided internal training/capacity building for the direct workforce	Built capacity among relevant business relationships (e.g. suppliers, consumers, communities)	Conducted an audit process and/or corrective action plan	Collective action with peers or other stakeholders to address the issue	Collaborated with governmental or regulatory bodies	Other (Please provide additional information)
Climate change	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Oceans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Nature and biodiversity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Air pollution	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Energy & resource use	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other environmental topic(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

E4. Within the reporting period, has the company been involved in providing or enabling remedy where it has caused or contributed to adverse impact(s) associated with the following environmental topics?

(Select one answer option per line) 

	No adverse impact identified or caused	Yes, adverse impact(s) identified, but no remedy provided/enabled	Yes, adverse impact(s) identified, and remedy provided/enabled	Choose not to disclose
Climate change	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Oceans	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Nature and biodiversity	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air pollution	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy & resource use	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other environmental topic(s)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Climate Action

E5. Does the company have a target(s), validated by a third-party, relating to the reduction of greenhouse gas (GHG) emissions?

(Text box with option for "No targets set") 

	Known	Baseline year (YYYY)	Target year (YYYY)	No targets set
Scope 1 targets validated by a third-party	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Scope 2 targets (market-based) validated by a third-party	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Scope 2 targets (location-based) validated by a third-party	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Scope 3 targets validated by a third-party	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Set targets are not validated by a third-party	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

E6. Within the reporting period, did the company measure Scope 3 global greenhouse gas (GHG) emissions?

(Select one answer per line, if "Known", include the value. Please enter only whole numbers, rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros.) [\(i\)](#)

	Known	Measured total emissions (tCO2e)	Yes, partially measured	We did not measure Scope 3 emissions (Please provide additional information)
Scope 3 emissions	<input checked="" type="radio"/>	1230668	<input type="radio"/>	<input type="radio"/>

E6.1. Which Scope 3 categories are included in the company's Scope 3 emissions calculation?

(Select all that apply) [\(i\)](#)

<input checked="" type="checkbox"/>	Purchased goods and services
<input type="checkbox"/>	Capital goods
<input type="checkbox"/>	Fuel- and energy-related activities
<input checked="" type="checkbox"/>	Upstream transportation and distribution
<input checked="" type="checkbox"/>	Waste generated in operations
<input checked="" type="checkbox"/>	Business travel
<input checked="" type="checkbox"/>	Employee commuting
<input checked="" type="checkbox"/>	Upstream leased assets
<input type="checkbox"/>	Downstream transportation and distribution
<input type="checkbox"/>	Processing of sold products
<input type="checkbox"/>	Use of sold products
<input type="checkbox"/>	End-of-life treatment of sold products
<input type="checkbox"/>	Downstream leased assets
<input type="checkbox"/>	Franchises
<input type="checkbox"/>	Investments
<input type="checkbox"/>	Other - upstream
<input type="checkbox"/>	Other - downstream

E7. Does the company have a climate adaptation plan?

(Select all that apply) 

<input type="checkbox"/>	Yes, and it includes physical risk assessments
<input type="checkbox"/>	Yes, and it includes a physical climate risk scenario analysis
<input checked="" type="checkbox"/>	Yes, and it includes actions to increase adaptation and resilience in the communities in which we operate
<input type="checkbox"/>	No, but we plan to within the next two years
<input type="checkbox"/>	No

Energy/Resource Use

E8. Has your company taken steps to reduce its fossil fuel consumption within the reporting period?

(Select one that applies) 

<input checked="" type="radio"/>	Yes
<input type="radio"/>	No

E8A. Please provide additional information:

We invest in Danish climate forests to compensate for our scope 1 and 2 emissions

E9. Has the company increased its direct/indirect investment in low-carbon technologies (e.g., renewable energy, nuclear energy, carbon capture and storage (CCS)) during the reporting period?

(Select all that apply) 

Yes, we have increased direct/indirect investment in renewable energy

Yes, we have increased direct/indirect investment in nuclear energy

Yes, we have increased direct/indirect investment in carbon capture and storage (CCS)

Yes, we have increased direct/indirect investment in other low-carbon technologies

No change – direct/indirect investment in low-carbon technologies remained the same

No, we have decreased direct/indirect investment in low-carbon technologies

Additional Topic-specific Questions

E10. Which of the following has the company identified as material environmental topics connected with its operations and/or value chain (e.g., based on the most severe actual or potential negative impacts on people and/or the environment)?

(Select all that apply) 

Climate change

Oceans

Energy & resource use

Water



Nature and biodiversity



Air pollution



Waste



None of the topics have been identified as material by the company

E10A. (Optional) Please provide additional information:

Our main impact is through our value chain

Additional Topic-specific Questions: Water

E11. Please provide details regarding the company's water withdrawal and consumption (own operations) within the reporting period.

(Select one answer per line, if "Known", include the value. Please enter only whole numbers, rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros.) [\(i\)](#)

	Known	Unknown	Not applicable (Please provide additional information)	Number
Total water withdrawal (Volume of water in megaliters):	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="text"/>
Percentage of water withdrawn in regions with high or extremely high water stress (%):	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="text"/>

	Known	Unknown	Not applicable (Please provide additional information)	Number
Total water consumption (Volume of water in megaliters):	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	1459
Percentage of water consumed in regions with high or extremely high water stress (%):	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	

Additional Topic-specific Questions: Nature and biodiversity ^

E13. Please report the number and area (in hectares) of sites owned, leased, or managed by the company in or adjacent to protected areas and/or key biodiversity areas (KBA).

(Select one answer per line, if "Known", include the value. Please enter only whole numbers, rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros.) [\(i\)](#)

	Known	Unknown	Not applicable (Please provide additional information)	Number
Sites	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Hectares	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Additional Topic-specific Questions: Air pollution ^

E14. Where applicable, please report the company's emissions of the following pollutants within the reporting period.

(Select one answer per line, if 'Known', include the value. Please enter only whole numbers, rounded to the nearest whole number. Do not use decimals, fractions, special characters, spaces, or leading zeros.)ⁱ

	Known	Emissions (t)	Unknown	Not applicable (Please provide additional information)
NOx	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>
SOx	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>
Volatile Organic Compounds (VOCs)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>
Hazardous air pollutants (HAPs)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>
Particulate matter (PM10)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>
Persistent organic pollutants (POPs)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>
Primary PM2.5	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>
Ammonia (NH3)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>
Black Carbon (BC)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>
Organic Carbon (OC)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>
Carbon Monoxide (CO)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>
Methane (CH4)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="checkbox"/>

	Known	Emissions (t)	Unknown	Not applicable (Please provide additional information)
Other pollutants (Please provide additional information)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

E14A. (Optional) Please provide additional information:

Not relevant for our company

E14A. Other pollutants (Please provide additional information):

Not relevant for our company

E14A. Not applicable (Please provide additional information):

Not relevant for our company

Additional Topic-specific Questions: Waste ^

E15. Within the reporting period, has the company acted to reduce waste generated by its operations?

(Select all that apply) (i)

Yes, through the implementation of circular and/or reuse initiatives

Yes, through investment in alternative materials

Yes, through recycling measures

No, we are not actively reducing waste

Anti-Corruption

Commitment



AC1. Does the company have an anti-corruption compliance programme?

(Select one that applies) [\(i\)](#)

No, this is not a current priority

No, but we plan to within the next two years

Yes

AC2. Does the company have policies and recommendations for employee procedures in case of doubt and/or in situations that may represent a conflict of interest, e.g. with regard to gifts and hospitality, donations, sponsorship, or interactions with public officials?

(Select one that applies) [\(i\)](#)

No, and we have no plans to develop any policy/recommendation

No, but we plan to within the next two years

Yes, included within a broader policy or as a standalone policy

AC3. Does the company engage in collective action against corruption?

(Select one that applies) [\(i\)](#)

No, this is not a current priority

No, but we plan to in the next two years

Yes (Please provide additional information)

Prevention

AC4. Who receives training on anti-corruption and integrity?

(Select all that apply) [\(i\)](#)

Selected employees (Please provide additional information)

All employees

Third-party suppliers, contractors and/or consultants

No training provided

Performance



AC5. Within the reporting period, have there been any suspected incidents of corruption?

(Select one that applies)

Yes

No