

# Diversity, Equity and Inclusion Policy

October 2024

## Objective

The Diversity, Equity & Inclusion (“DE&I”) Policy (the “Policy”) commits to ensuring a diverse and inclusive culture within Danske Bank Group (the “Group”).

As a Group, we play a fundamental role in society by providing financial services and solutions that support individuals and businesses. As one of the largest financial institutions in the Nordics, our actions and behaviour affect society. As part of our responsibility towards society, we strive to operate sustainably, fairly and transparently. We actively minimise and avoid adverse or harmful impact from our business activities. The Policy highlights Danske Bank A/S’ (“The Bank”) aspiration, approach, and principles within DE&I to deliver on our DE&I mission statement.

The objective of the DE&I Policy is:

- To ensure a diverse, equitable and inclusive culture within the Group.
- To ensure that the Group adheres to applicable regulatory requirements set out in the Danish Financial Business Act (the “DFBA”), the Danish Companies Act (the “DCA”) and the EU Directive on Improving the Gender Balance Among Directors of Listed Companies and Related Measures.

The Danish legal requirements for having a diversity policy are set out in the DFBA and the DCA. The Policy contributes to fulfilling the DFBA and the DCA which states that the Board of Directors must set a policy for diversity that motivates sufficient diversity in qualifications and skills and that increase the proportion of the under-represented gender unless there is an equal distribution of women and men at the different levels of management, cf. section 70 (1) no. 4, 80 a (3) no. 3 in the DFBA and section 139 c (1) no. 3 in the DCA. Furthermore, the Policy meets the requirement to implement group levels targets in support of increasing the percentage of the under-represented gender at different levels of business management, cf. section 79 a (1) no. 1-2 in the DFBA and section 139 c (1) no. 1-2 in the DCA. The Policy also contributes to fulfilling the EU Directive on Improving the Gender Balance Among Directors of Listed Companies and Related Measures by establishing the gender balance targets for the Board of Directors and Executive Leadership Team.

## Definitions

The definitions for the terms used throughout this Policy are available in Appendix 1.

## Scope and target group

This Policy covers the principles by which the Group ensures a diverse, equitable and inclusive culture.

The Policy applies to all employees, all functions, all units in the Bank, and all subsidiaries once adopted by their Board of Directors.

## Policy content

### Mission statement

We promote diversity, equity and an inclusive culture in Danske Bank. Our objective is to ensure that Danske Bank is a diverse and inclusive organisation, to support all our employees through making them seen, heard and included. Not only is it the right thing to do, it is business critical if we want to stay relevant to our customers, employees, shareholders and society in the future.

A diverse culture is about inviting, welcoming and embracing multiple competencies, and mindsets into our company to help us become more open and informed, and reflect the diversity of the societies we are part of.

A culture of equity refers to fair treatment for all people, so that the norms, practices, and policies in place ensure identity is not predictive of opportunities or workplace outcomes.

Essentially, an inclusive culture is about nurturing a sense of belonging in the workplace. When people belong, they are comfortable with expressing themselves openly, freely and in their own voice and feel empowered to make a difference.

A diverse, equitable and inclusive culture will create equal opportunities for our employees and value for us as a workplace and a business. It will unlock the full potential of our employees, provide us with a competitive edge and help us become a sustainable corporate citizen for all our stakeholders.

### Principles

Danske Bank is committed to several principles in the Policy to step-change the transformation across the Group. The DE&I agenda is dynamic and therefore the focus areas supporting each principle reflect what we strive for currently.

**Principle 1: The Bank is committed to improving diversity across all characteristics as these are important levers to broaden our thinking and perspectives**

It is about empowering people by respecting and appreciating their different perspectives, backgrounds and ways of working and being.

**Subprinciple 1.1: We remain committed to increasing in particular the share of the underrepresented gender (e.g., women) in leadership as the equal gender split in the general workforce is not reflected across leadership levels**

We want to achieve this by strengthening DE&I perspectives in our HR processes, e.g., with a key focus on the gender composition in both our recruitment- and selection process, performance management process and when preparing the pipeline of talents and successors for key positions, in order to make this as balanced as possible.

In addition, the Bank strives towards appropriate diversity in terms of gender among the members of the Board of Directors. Furthermore, we ensure diversity in their qualifications and competencies. It is a prerequisite that collectively the members of the Board of Directors shall have sufficient knowledge, professional competencies, and experience to understand the Group's activities and the related risks.

### **Subprinciple 1.2: Gender balance targets on different leadership levels – aspiration for 2028**

Our aspiration for 2028 is a next step in our journey, growing to a balance of 40% for the underrepresented gender in; Board of Directors, Executive Leadership Team, level 2 leaders, level 3 leaders and Senior Leaders. For leaders we set the bar at 45% for the underrepresented gender. This aspiration is supported by several initiatives to sustain fulfilment of the agenda. The targets are defined on a Group level and cascaded to units and countries to ensure local adoption and delivery.

### **Roles and Responsibilities**

The Executive Management Team owns the responsibility for the Bank prioritizing and advancing within Diversity, Equity and Inclusion. At Group level, the development of the strategy and the agenda is delegated to the DE&I Team, supported by a DE&I Council, consisting of senior leaders from across the Group. At unit and country level, HR, leaders and DE&I Leads will team up to ensure local anchoring, involvement of employees, to share and give feedback to the overall approach, to ensure all we do adds up.

HR and leaders own the responsibility of ensuring that policies and daily practices promoting equal opportunity, equity and bias mitigation are applied and followed in order to improve diversity.

**Principle 2: The Bank is committed to ensuring equity in everything we do, and to promote opportunities for all, so that identity is not predictive of opportunities or workplace outcomes.**

**We do this by improving on our culture, our norms and processes, and by having procedures in place to mitigate bias in our daily practices.**

Where appropriate, the Bank also monitors that employees are provided with equal terms, and we report and act if any discrepancies are identified within relevant areas.

### **Roles and Responsibilities**

HR and leaders own the responsibility of ensuring that policies and daily practices promoting equal opportunity, equity and bias mitigation are applied and followed.

**Principle 3: an inclusive culture and mindset must be practiced.**

The Bank is committed towards building and fostering an inclusive culture which to us is an organizational effort, and practice in which different groups and individuals, having different backgrounds, are culturally and socially accepted, welcomed, and equally treated. This creates a sense of belonging which is key to drive inclusion.

It is therefore expected from both leaders and employees to demonstrate and practice inclusive attitude and behave in daily practices in such a way that builds and fosters an inclusive culture. This is e.g. also why we support and encourage the establishment of Employee Resource Groups, voluntary, employee-led groups that spark courageous conversations and learnings by sharing their insights.

Further, the Group strives at offering flexibility and care to cater for different life situations in order to retain employees during the times in which this may be needed, e.g. through working from home, part-time employment, equal parental leave arrangements or similar.

## Roles and responsibilities

It is everybody's responsibility to contribute to building and fostering a diverse and inclusive culture. It is expected of all employees to behave in a way that is respectful of other colleagues and to acknowledge that we are different. However, this particularly depends on leaders practicing and role modelling the culture commitments inclusively and creating a culture and an atmosphere of trust and openness in their team(s).

### **Principle 4: Danske Bank does not accept discrimination, harassment, or offensive workplace behaviour**

It is everybody's responsibility to contribute to creating a diverse and inclusive culture. It is expected of all employees to behave in a way that is respectful of other colleagues and to acknowledge that we are different. Actions and behaviour can be interpreted as harassment even if it was not the intent. It is also expected that all leaders and employees proactively educate themselves, counteract and stop any direct or indirect bullying, harassment, discrimination or micro aggressions.

## Roles and Responsibilities

Danske Bank has a governance process in place ensuring that any violation of the Policy principles will be managed appropriately. If employees experience behaviour that does not seem right or is not in accordance with the elements described in the Policy, it is important that they act and share their concerns or report an issue. We do not accept any retaliations linked to speaking up. It is the obligation of Danske Bank to have tools in place to make it easy to address any concerns. As such, there are three primary ways in which employees can share their concerns in this regard:

1. Talk to your manager or a colleague
2. Reach out to special functions (Group HR or Group Compliance)
3. Use our Whistleblowing system

Employees should report through the Whistleblowing Scheme if they feel unable to raise their concerns to their line manager, to specialist departments such as HR or Compliance, or through other channels. Employees can send a report through the whistleblowing system. They can find out more about whistleblowing on the [intranet](#), including how employees are protected if choosing to send a report, or consult the [Whistleblowing Policy](#) here.

Further information can be found on the '[Share Your Concerns](#)' site. Read more about our way of behaving and doing business in our [Code of Conduct](#).

## Escalation

Where a breach or potential breach of this Policy has been identified, an Employee must notify the Administrator of this policy.

Where the breach is also defined as an event, this must be registered and categorised immediately in ORIS according to the Non-Financial Risk Event Escalation Instruction.

The administrator of the Policy, following internal assessment with relevant stakeholders, where material breaches are identified, must escalate to the Executive Leadership Team. Material breaches include, but are not limited to:

- Dishonest or deliberate actions/behavior to mislead the Group

- Unacceptable behavior such as harassment, discrimination and or micro aggressions
- Initiatives or actions working against the bank's DE&I approach of building and fostering an inclusive culture
- Processes and systems are not followed and/or insufficient in securing equity

Overall, the Executive Leadership Team and the DE&I Council shape and set the standards for the Group DE&I agenda. Furthermore, they monitor and closely follow progress on the 2028 targets and ambitions to ensure the right focus and efforts.

The specific initiatives initiated across the Group and the reporting on targets are described in the Sustainability Report and Sustainability Fact Book.

## Appendix 1 - Definitions

The below definitions apply to the terms used throughout the Policy.

<b>Group</b>	the parent company with its subsidiaries.
<b>Input providers</b>	stakeholders who have provided input to the governing information.
<b>Board of Directors</b>	the organisation's body, which is appointed in accordance with national law, which are empowered to set the strategy, objectives and overall direction of the organisation, and which oversee and monitor management decision-making.
<b>Executive Leadership Team</b>	the organisation's body, comprised of the Executive Directors, who have executive functions and that are responsible for the effective direction of the organisation. Also referred to as ELT.
<b>L2</b>	Level 2 leaders consist of the Executive Leadership (ELT) and leaders reporting to the CEO
<b>L3</b>	Level 3 consists of the leaders on the organisational level reporting to level 2.
<b>Senior Leaders</b>	defined as employees who hold the title CEO, leader of business/function or leaders of leaders, or leaders of team
<b>Leaders</b>	defined as employees registered as supervisors.
<b>Target group</b>	the group of people, subsidiaries, areas and/or functions, for whom the governing information is intended to be directly applicable.
<b>Diversity</b>	the existence of variations and differences in characteristics in a group. See characteristics below
<b>Characteristics</b>	include, but are not limited to, gender, gender identity and sexual identity/orientation (LGBTQ+), age, nationality, ethnicity/cultural background, religious beliefs, family status, disabilities and social origin, working styles etc.
<b>Inclusion</b>	building and fostering a culture and practice in which different groups and individuals, are culturally and socially accepted, welcomed, and equally treated. This creates a sense of belonging which is key to drive inclusion
<b>Equity</b>	recognizes that each person has different circumstances and allocates the exact resources and opportunities needed to release their potential and to reach an equal outcome
<b>Equality</b>	allocating the same resources and opportunities to each individual or group of people
<b>Micro-aggression</b>	A statement, action, or incident regarded as an instance of indirect, subtle, or unintentional discrimination, stereotyping or exclusion of/against member of a minoritized group