



# Sustainability report 2021

ALK-Abelló A/S  
Bøge Allé 6-8  
DK-2970 Hørsholm  
Denmark  
CVR no. 6371 79 16



# Table of contents

ALK is committed to conducting business in accordance with the UN Global Compact's 10 Principles. This report includes our progress within the areas of human rights, labour, environment and anti-corruption.

cf. sections 99a, 99b, 99d and 107d of the Danish Financial Statements Act

cf. Article 8 of the EU Taxonomy

- 3 CEO Letter
- 5 ALK at a glance
- 6 Business model
- 7 Sustainability performance
- 8 Access to allergy care
- 12 People
- 18 Environment and climate
- 24 Responsible business practices
- 30 ESG key figures

COMMUNICATION ON PROGRESS



This is our **Communication on Progress** in implementing the Ten Principles of the **United Nations Global Compact** and supporting broader UN goals.

We welcome feedback on its contents.



## Annual report

Read more about last years financial performance in our annual report 2021.

[Find our annual report here](#)



## Website

Find more information about ALK on our website.

[Read more on alk.net](#)



LinkedIn

Twitter

Cover picture: Allergenic source materials like pollen from birch trees are cultivated at our own farming facilities.

## CEO Letter

# 2021 was a year of great engagement across ALK

With the involvement of global stakeholders, sustainability continues to progress our business strategy and operations towards achieving access to allergy care.

## Charting the journey to a sustainable future

2021 marks significant milestones on ALK's sustainability journey, where we continued to integrate sustainability and deliver on our long-term strategy. We have established a Sustainability Committee, with members consisting

of key stakeholders from our Board of Management and senior leaders across the business, to discuss key issues and ensure progress on sustainability initiatives. Building on our materiality assessment, securing access to allergy care for all remains our greatest opportunity to positively influence our business and society in general. Additionally, ALK is focusing on creating positive impact on the environment and climate, diversity and inclusion, and responsible business practices.

Our sustainability activities are underpinned by the 10 Principles of



“ I believe such strong engagement is made possible by the positive ALK culture that unites our employees whenever the business faces challenges.

**Carsten Hellmann,  
President & CEO**

the United Nations Global Compact, to which I am pleased to reaffirm our ongoing commitment.

In addition, we continue to promote sustainable development by contributing to the realisation of the United Nations Sustainable Development Goals.

## Expanding Access to Allergy Care for All

Our Access to Allergy Care for All strategy describes our ambition, purpose and long-term goals and defines a series of short-term milestones to chart our progress. Our aim is to make ALK products and solutions more universally accessible, while ensuring sustainable growth and an ethical, profitable business. In line with this ambition, in 2021, we extended the reach of our allergy immunotherapy products to cover Saudi Arabia and Uzbekistan. We also established a new partnership with Grandpharma, a pharmaceutical company in China, to expand the availability of our adrenaline auto-injector Jext®, which is used for the emergency treatment of acute allergic

reactions. Also in 2021, we reached an important step towards making our products more accessible to a wider range of patients, by adding the treatment of children and adolescent patients to the approved indications for our range of tablets in 10 additional countries.

### Employee engagement contributes to our success

We saw high engagement from ALK's employees in 2021, which was a critical factor in our continuing success. I believe such strong engagement is made possible by a positive ALK culture that unites our employees whenever the business faces challenges, as seen in the way every employee responded to the COVID-19 pandemic. Despite the many changes in working practices in 2021, the results of our global employee engagement survey produced results higher than the benchmark for our industry.

### Addressing environmental impact across the value chain

When it comes to the environment, we have embarked on a journey to reduce our environmental impact by optimising waste management and reducing energy consumption and CO<sub>2</sub> emissions wherever possible. Our aim is to increase recycling and to create a more circular life-cycle for our products and materials. The introduction of new, recyclable and biodegradable packaging for selected products, and the migration of one of our production sites in France to being fully powered by renewable energy, are just some of the examples of progress in 2021. I look forward to us building on this positive momentum in 2022.

Best regards,

Carsten Hellmann  
President & CEO

## Our current focus areas

We continuously conduct assessments based on trends and stakeholder input to ensure that our priorities remain relevant.



# ALK at a glance

ALK is a global allergy solutions company, with a wide range of allergy treatments, products and services that meet the unique needs of people with allergy, their families and healthcare professionals. ALK offers products, services and resources covering a wide range of allergies, supplemented by diagnosis and emergency treatment products.



## Established

# 1923

ALK has a history of consistently developing major advances for the treatment of allergy, most recently in the research and development of new, evidence-based allergy immunotherapy treatments.



## Employees

# ~2,600

ALK has approximately 2,600 employees across the globe, the majority of which are based in Europe.



## Markets

# 47

Globally, ALK is present in 47 countries either directly, via our 23 subsidiaries, or through partnerships with distributors in additional markets. ALK is predominantly present in Europe, where more than 70% of ALK's revenue is generated.



## Patients in treatment\*

# ~2.1 m

ALK continues to make allergy care more accessible with approximately 2.1 million patients treated.

\* covering ALK's AIT and anaphylaxis treatments



## Global headquarters

ALK is headquartered in Hørsholm, Denmark, with production facilities in four countries.



## Shareholders

ALK is a publicly listed company owned by approximately 20,000 shareholders. The majority shareholders include: Lundbeckfonden (The Lundbeck Foundation) which has a 40.3% interest and ATP which has an 8.8% interest.



## Management structure

ALK has a two-tier management structure consisting of the Board of Directors and the Board of Management. The two boards are independent of each other.



## Participated in clinical trials for the tablets

# >24,000

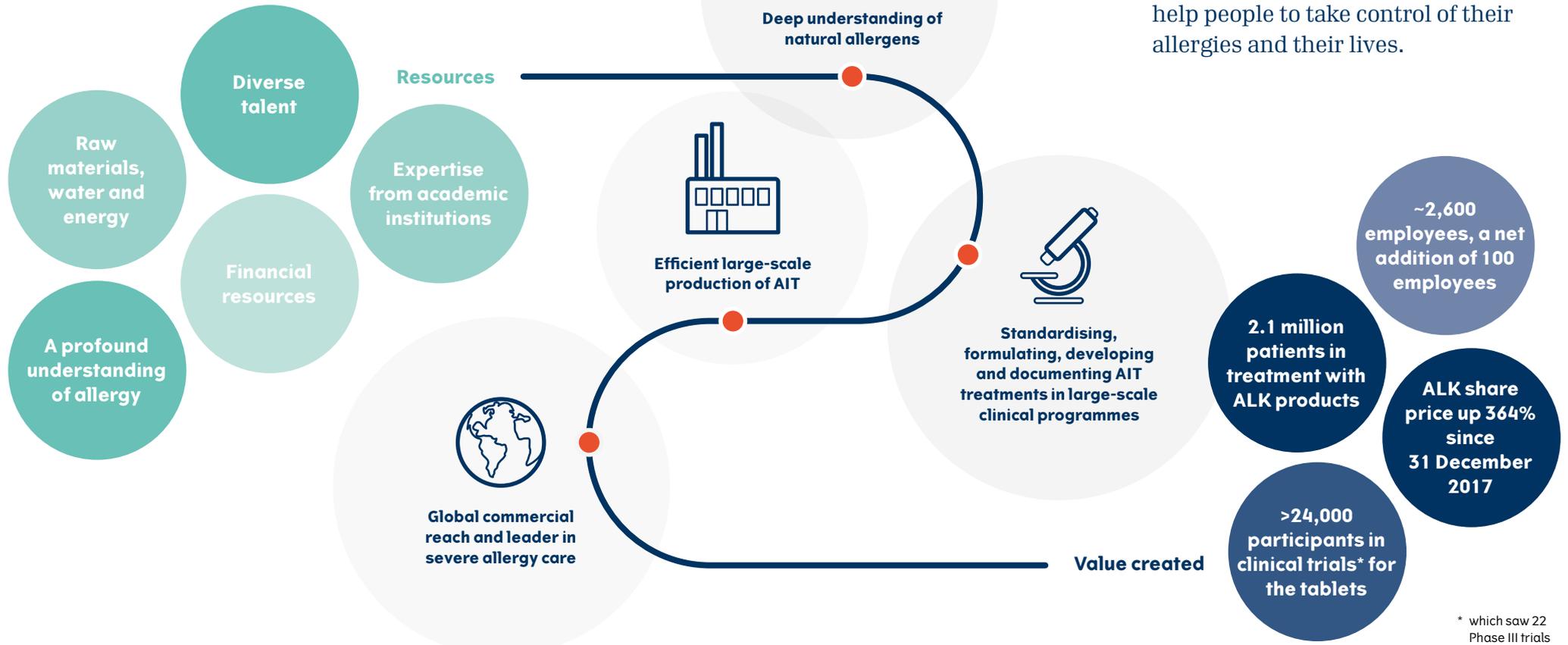
ALK's tablet-based treatments have the largest evidence-base of any form of AIT treatment.

### Find out more

about ALK:  
<https://www.alk.net/our-company>

ALK's Business Model

# Becoming relevant for more people with allergy



“ As a global allergy solutions company with a century of scientific knowledge and expertise, ALK’s business model is designed to help people to take control of their allergies and their lives.

\* which saw 22 Phase III trials

# Sustainability performance 2021

■ On track or above target  
 ■ Target not met

	Milestones	2021-2025 Targets	2021 Results
Access to allergy care for all	<b>2022:</b> Establish a business model for partnership programmes that improve Access to Allergy Care, and which can then be used as a template for other partnerships	-	In progress
	<b>2023:</b> Make ALK allergy diagnosis, immunotherapy treatments and/or adrenaline products accessible to at least 300,000 additional patients	300,000	+100,000
	<b>2025:</b> Introduce tablet-based AIT in 5+ new countries	5+	Saudi Arabia & Uzbekistan
	<b>2025:</b> Make ALK allergy immunotherapy and adrenaline available in countries with no access to ALK allergy products	-	In progress
	<b>2025:</b> Children/adolescent indication added to current indication in 10+ countries	10+	10
	<b>2022:</b> Strengthen knowledge about innovations in allergic disease via scientific communication to 20,000 healthcare professionals	20,000	29,800
	<b>2022:</b> Establish partnerships to train 4,000 healthcare professionals in allergy treatment and immunotherapy	4,000	3,800
People	<b>2022:</b> Maintain the injury frequency rate $\leq 3.0$	$\leq 3.0$ Max. 9 annually	0.3 1 accident
	<b>2025:</b> Maintain gender balance of approximately 50% at Manager and Director levels	50%	53%
	<b>2025:</b> Strive to increase the number of women in VP and Senior Director positions to 35% in 2025	35%	29%
Planet	<b>2022:</b> Reuse/recycle 47% of waste	47%	50%
	<b>2022:</b> Annual water consumption levels should not exceed 2019-baseline of 122,000 m <sup>3</sup>	122,000 m <sup>3</sup>	128,000 m <sup>3</sup>
	<b>2022:</b> Annual energy consumption levels should not exceed 2019-baseline of 47,000 MWh	47,000 MWh	46,000 MWh
	<b>2025:</b> 60% reduction in CO <sub>2</sub> emissions including emissions from 1 <sup>st</sup> leg distribution, travel flights and company cars against a 2019-baseline of total emissions from non-renewable sources	60%	42%
Resp. bus.	<b>2022:</b> Maintain ALK Code of Conduct employee training participation above 90%	90%	97%
	<b>2022:</b> By 2022, we want women to make up 30% of the shareholder-elected members of the Board of Directors	30%	33%

## ALK's sustainability strategy



### Access to allergy care for all

- Enable access to ALK allergy diagnosis, immunotherapy treatments and/or adrenaline products
- Strengthen knowledge about innovations in allergic disease via scientific communication
- Invest in evidence-based immunotherapy to treat allergies, including in child populations
- Establish partnerships to train healthcare professionals in allergy treatment and immunotherapy



### People

- Diversity & Inclusion
- Employee safety



### Environment and Climate

- CO<sub>2</sub> emission reductions
- Reduce/recycle waste
- Water use
- Energy use



### Responsible business practices

- Code of conduct training



# Access to Allergy Care for All

# Access to Allergy Care for All

Allergy is the most common chronic disease in the world, and estimates show that more than 500 million people are affected by allergic rhinitis globally.<sup>1</sup> Whether the patient's trigger for symptoms is pollen, house dust mites or food, the consequences of allergic disease impact the everyday lives and well-being of millions of people.

Connecting people with the medicines they need is one of the greatest challenges facing society today, and this is just as true for people living with allergy and allergic asthma. Over 2 million people worldwide rely on ALK medicines to treat their allergies. This

figure represents just a fraction of those who might benefit from our treatments. Some of the current barriers to gaining access to ALK's medicine range from the relevant allergy medicines simply being unavailable in certain locations, to a lack of access to specialist doctors, or simply lack of awareness of the possible treatments.

To help address this issue, we have continued the ALK access to medicines strategy to enable **Access to Allergy Care for All**. Our goal is to make ALK products and medicines available to more people around the world and help treat people earlier in their allergy journey.

We are committed to leading the way in allergy treatment by applying our research and development expertise,

understanding of working effectively in partnerships and expert knowledge in highly regulated products to provide Access to Allergy Care for All.

## Expanding access to allergy care

Allergy care is especially important when it comes to children and their

Continues

**2030 Commitment: Enable access to ALK allergy diagnosis, immunotherapy treatments and/or adrenaline products by increasing the number of patients by at least 100,000 annually**



### Access to Allergy Care for All has two guiding principles:

- Focusing primarily on people with allergy and their need for a correct diagnosis and treatment
- Supporting healthcare providers and healthcare professionals is a precondition for providing efficient allergy care. Without a healthcare infrastructure, people with allergy cannot benefit from our allergy solutions

### Find out more

about our ATM Policy:  
<https://www.alk.net/sustainability>

Sources:

<sup>1</sup> Brozek J et al. Allergic Rhinitis and its Impact on Asthma (ARIA) guidelines: 2010 Revision. J ALLERGY CLIN IMMUNOL VOLUME 126, NUMBER 3.



People with allergy experience a significantly higher quality of life when well informed on how to minimise symptoms.

➤ **Find out more**

about our solutions to the treatment of allergy: <https://www.alk.net/our-solutions>

“Anaphylaxis is an increasing health concern in China. By introducing an adrenaline pen, we hope to ensure that patients receive timely treatment without the need for trained personnel. Grandpharma’s existing franchises will provide a broad and strong launch platform for Jext<sup>®</sup>, and we look forward to a long and successful collaboration.”

**Xian Ji, General Manager, ALK Greater China**

early development. We are conducting several studies to demonstrate the benefits of our medicines for younger people, with the intention of securing paediatric indications for our tablets in several more countries, including emerging markets. Subject to approvals, these products could minimise the burden of allergic disease in children and decrease their reliance on symptomatic treatment. With our solutions, we aim to help diagnose and treat allergy much earlier, and thus contribute to a better quality of life for children. Additionally, we extended the reach of our allergy immunotherapy products geographically to cover Saudi Arabia and Uzbekistan in 2021.

**Partnerships**

In countries with no access to allergy immunotherapy treatments, partnerships often form the first step in the accessibility of ALK solutions. In 2021, we established an exclusive licensing agreement with Grandpharma, where our Jext<sup>®</sup> adrenaline auto-injector (AAI) will be registered and launched in China. AAI’s are used for the emergency treatment of acute allergic reactions, also known as anaphylaxis, which can be triggered by exposure to certain foods such as eggs, milk, shellfish and nuts or exposure to the venom from bee and wasp stings. Jext<sup>®</sup> will be the first AAI registered in China. Additionally, we are developing new

Continues ▶

business partnership models with the aim to geographically expand access to allergy care.

**Educational training**

We engage systematically in educational activities, training and dialogue with healthcare professionals to enhance insights into the diagnosis and treatment of allergic disease. This work is instrumental in ensuring better patient care. In 2021, we trained 3,800 healthcare professionals in allergy and AIT and educated 29,800 healthcare professionals in allergic disease innovations via scientific communication. Additionally, we engage with patients’ organisations all over the world in their work to raise awareness about patient care and product safety.

**“ 2030 Commitment: Educate 200,000 healthcare professionals and establish partnerships to train 50,000 healthcare professionals in allergy treatment and immunotherapy**

**Digital solutions**

We continued our efforts to raise awareness about allergy in the general population through our klarify digital platform. Klarify aims to empower people to take action on their allergies by offering information and guidance on how to avoid and alleviate the symptoms of allergy. Klarify is currently available in seven countries across North America and Europe. In 2021, ALK’s digital channels mobilised over 375,000 people to take action on their allergies. ALK tested several concepts in various countries to eliminate friction points on the path to prescription for the many untreated patients eligible for AIT treatment.

**Number of countries tablet based AIT was introduced in:**

2

Uzbekistan and Saudi Arabia

**New patients:**

+100,000

Increasing patients in treatment to 2.1 million in 2021

**Training of healthcare professionals:**

3,800

We plan to reach 4,000 healthcare professionals by 2022

**Number of countries children & adolescent indications were approved in:**

10

We plan to exceed 10 new country indications by 2025



Training healthcare professionals is a precondition for providing efficient allergy care. Without a healthcare infrastructure, people with allergy cannot benefit from our allergy solutions



# People





## High engagement across the organisation

In 2021, we introduced a new method of measuring employee engagement across ALK. Our new platform marks our transition towards digital solutions, enabling better dialogue between leaders and their employees.

The measurement from the annual engagement survey in 2021 will be used as a baseline to gauge future progress. Out of the 93% of employees that responded, ALK registered an overall engagement score of 8.2, 0.6 above the healthcare industry benchmark, placing ALK in the top 25<sup>th</sup> percentile of the industry. In addition, more than 11,000 comments were submitted, containing

suggestions for improvements, as well as positive acknowledgements of the working culture at ALK.

One area for improvement, highlighted in the survey, is the need to enhance communication of our company strategy across the organisation. In the spring of 2021, we held a series of what we call 'Spirit Days,' local town hall meetings throughout ALK, to ensure that our strategy was well

communicated and understood by all employees. Similar events will be repeated in 2022 as part of a continuous drive to ensure our strategy is understood and applied across business units and geographies.

A subsequent engagement survey will take place in 2022 to assess our progress and identify future areas of focus.

**“ We are very proud of the results from our engagement survey and believe that our continued efforts to secure a strong company culture, focusing on our values, has positively contributed to the high engagement. In addition, our purpose, good financial results and growth ambitions contribute to a sense of pride and engagement in our daily work.”**

**Lisbeth Kirk, Senior Vice President, Human Resources, Internal Communication and Sustainability**

### ALK's cultural beliefs

**Our cultural beliefs and behaviours** describe the aspiration for our company culture and encompass the attitude and mindset required to become the world leader in allergy.



# People

People are at the heart of everything we do, and the talent and dedication of our employees are critical to ALK's continued growth. Therefore, our ambition is to create a work environment that can attract, develop and retain well-qualified and highly engaged employees.

## Learning and development

Growth opportunities continue to be one of the major drivers of engagement at ALK. Although learning and development opportunities at ALK were evaluated above the industry benchmark in our engagement survey, we still see a need to focus on growth opportunities and ensure career progression for all ALK employees.

As a part of employee development, individual performance is reviewed annually with direct managers. In 2021, 84% completed a development agreement. An important aspect of these dialogues is to enable a strong, continuous feedback culture as a mechanism for ensuring positive development for individual employees and the company as a whole.

## Leading with impact

Our Leading with Impact programme ensures a strong pool of future leaders across the organisation. In 2021, the programme had a specific focus on agility, strengthening our feedback culture and inclusive leadership.

The primary aim of developing our leaders, is to equip them to act in a volatile, uncertain, complex and ambiguous world, where we continuously prepare our organisation to respond to changing business

Continues ▶

### ALK follows internationally recognised standards:

- The Universal Declaration of Human Rights
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- The UN Guiding Principles on Business and Human Rights

### ALK policies on human rights and labour rights:

- Code of Conduct
- Conflicts of Interest Policy
- Diversity and Inclusion Policy
- Environment, Health and Safety Policy
- Harassment Policy
- Sustainability Policy



### In this area we support:

UN Global Compact Principles 1-6  
<https://www.unglobalcompact.org/what-is-gc/mission/principles> and UN Sustainable Development Goals 5,8,10  
<https://sdgs.un.org/goals>



circumstances. In turn, these leaders drive organisational development by adapting our structures and processes to fit our strategy execution. Today, 150 leaders are enrolled in the programme, which will expand to include ALK’s remaining 300 leaders in 2022-2023.

**Talent development**

To further accelerate employee development, our talent programme ASPIRE is also being rolled out. ASPIRE adopts a twofold approach where we focus on both individual talent development and opportunity identification. Talents are assessed, and individual development plans are created. We apply this process to both a local and global level, to identify talents early in their career, and maximise their opportunities for further development.

**Lifelong learning**

ALK Learn is a learning platform for all employees where topics of importance and common interest are presented either by internal or external speakers. The sessions are virtual and regularly attract audiences of around 200-300 employees. Topics in 2021 have

included ‘Corona fatigue and how to overcome it’, ‘Peanut and food allergy’ and ‘Diversity and inclusion’.

**Diversity and inclusion**

At ALK, we believe an organisation that ensures diversity and inclusion at all levels delivers better business results. Our ambition is to continue building an inclusive work environment that fosters a sense of belonging, where different perspectives, abilities, talents and experiences are valued.

For us, diversity encompasses an individual’s uniqueness such as perspectives, competencies, work and life experiences, age, gender, race, ethnicity, religion, sexual orientation, ability or any other characteristics. This year we worked with external partners to train employees and leaders in how to ensure an inclusive work environment. Diversity and inclusion consists of several elements including talent management, succession planning, mentoring and sponsorship programmes, unconscious bias training, flexible working options, regular pay-gap assessments, paid parental leave and more.

**Female VP and Senior Directors**

29%

We plan to reach our goal of 35% female Vice President and Senior Directors by 2025

In 2021, we took a step towards reaching our goal of increasing gender diversity at the vice president and senior director level. We aim to achieve 35% female representation in 2025. Currently, 29% of the vice presidents and senior directors are represented by women, up from 26% at the beginning of the year. Furthermore, our distribution of men and women at manager and director level stayed within our target of maintaining a gender balance of approximately 50%, with 53% women and 47% men at the director and manager level.

**Female Managers and Directors**

53%

Our goal of approximately 50% female Managers by 2025 is currently fulfilled

Continues ▶



Our office space promotes new ways of working, combining remote work and in office collaboration.

**New ways of working**

As a result of the COVID-19 pandemic and our focus on keeping our people safe, we were flexible in finding alternative ways of business. This resulted in new ways of engaging with healthcare professionals, innovative solutions to maintain product supply, and many employees working from home for extended periods.

**The Board of Directors**

ALK’s Board of Directors consists of six shareholder-elected members and three employee-elected members. Two shareholder-elected members are women, fulfilling our target of 30% female representation. The goal will be maintained in 2022.

**Female shareholder-elected board members**

**30%**

Our goal of 30% female shareholder-elected members is currently fulfilled

In addition, two of the employee-elected members are women. Two of the shareholder-elected members have nationalities other than Danish. Three of the shareholder-elected members are independent members in line with the recommendations on corporate governance.

The Remuneration and Nomination Committee, constituted by the chairmanship, is responsible for the selection and nomination of candidates for the Board of Directors. Selection

is assessed by the Board of Directors and is based on a transparent process that defines the desired profile, taking into account the need for new talent, diversity, age and gender. Our diversity targets and results are disclosed in line with cf. section 99b and 107d of the Danish Financial Statements Act.

**Health, safety and well-being**

Together with Human Resources, our Environment, Health and Safety (EHS) organisation works in close dialogue with ALK’s leaders to ensure a healthy working culture at ALK, both in terms of psychological environment and a healthy work-life balance. EHS representatives are present at all production sites to ensure that the EHS policy and relevant procedures are followed.

The COVID-19 pandemic continued to be a major risk in 2021. Therefore, we continued the work of our global Corona Task Force to anticipate and mitigate the potential consequences of the virus. The safety of our employees remained our top priority, and we continued to adjust our contingency

Continues ▶



ALK aims to maintain approximately a 50% balance in gender diversity at the manager and director level.

plans to safeguard both employees and the ongoing supply of medicines. Social distancing measures were put in place, and employees received safety kits with face masks and sanitising products. There were no disruptions to the supply of ALK medicine in 2021.

The Corona Task Force will remain engaged until the pandemic no longer constitutes a risk to our employees and patients.

**Safety of our employees**

In 2021, there was one occupational accident at ALK facilities, resulting in an injury frequency rate of 0.3. The accident was related to the ergonomics of the workplace and a root-cause analysis has been conducted to ensure that preventative measures are implemented.

We ensure good occupational health conditions and access to occupational healthcare services for all employees. All employees have access to healthcare coverage and insurance for work-related accidents or diseases made available, or paid for, by ALK.

Workplace assessments are conducted regularly to ensure we mitigate health and safety risks. Safety training is adapted to local needs and allows flexibility in line with local laws. All relevant employees are trained in the Chemical Management System, which contains our safety data sheets and describes common hazards and the precautions to be taken.

We will continue to monitor risks related to safety, health and well-being in 2022. We plan to strengthen our “duty of care” initiatives for travelling employees and explore new ways to safeguard the psychological work environment.

**Human rights and labour rights**

The general nature of the work at ALK requires highly skilled employees who are well trained in our procedures. ALK’s production facilities are located in Denmark, France, Spain and the USA where laws and regulations are generally well-enforced. Combining these two factors, leads to a low risk of human and labour rights violations. Should risks arise, ALK has mechanisms in place to prevent and mitigate them.

**Find out more**

More details about the composition of the Board of Directors, its members, and their competences, are available on our website: <https://ir.alk.net/corporate-governance/board-of-directors>.



**Move for Allergy**

More than 1,700 employees worldwide participated in our annual ‘Move for Allergy’ event, which emphasises the importance of collaboration, interconnectivity, and having a sense of belonging. The event connects colleagues on the same day all around the world by encouraging everyone to exercise either by walking, running or cycling – alone or in small groups. Pictures and stories from the event were shared on our online social wall and created a sense of connectedness, even when separated physically.



# Environment and Climate



In France, ALK has launched a new packaging design for our allergy immunotherapy drops brand OSIRIS®. This new packaging is not only more modern in design, but also 100% recyclable and biodegradable.



## Introducing a recyclable and biodegradable packaging solution

**Packaging is a key concern when it comes to consumption and waste management. To avoid unnecessary waste, we are working on product life cycle solutions to packaging and medical waste.**

The total carbon footprint of OSIRIS® is 19 times lower than the previous packaging option, reducing plastic consumption by up to 60 tonnes annually.

In addition to the sustainability benefits, the new packaging is also more user-friendly with its colour-coded design, making it easier to read for patients who take multiple treatments. ALK intends to evaluate similar packaging solutions across the entire product range following the positive feedback from both patients and healthcare professionals.

With an increase in awareness and concern from our patients and healthcare professionals, we developed a new packaging solution in 2021 for our Osiris® products in France. Stringent testing ensured the quality of our medicines would remain uncompromised.

“The new OSIRIS® packaging is a good example of how ALK is integrating sustainability considerations across different operations. Our goal is to continue making improvements that not only contribute to our mission to become the world leader in allergy, but also protect the environment.”

**Nicolas Dufourt, General Manager, ALK France**

# Environment and Climate

The environmental impact of business activities and the ongoing climate crisis represent some of the greatest challenges facing the world today.

As a manufacturing company, ALK can be both part of the problem and a contributor of solutions. We strive to achieve sustainable resource consumption and are taking measures to reduce the impact our production processes have on the climate.

Most of the allergenic source material production occurs at our own farming facilities. This enables us to take ownership of our value chain and consider the environmental impact of all stages, from cultivating and harvesting raw materials to manufacturing, packaging and distributing our medicines.

## Assessing and mitigating environmental risks

As part of the Environmental Health and Safety (EHS) Management System, assessments of environmental and climate risks are conducted. Climate mitigation and adaptation is increasingly important as droughts and flooding affect our production sites in different regions.

All of our production sites adhere to our Global EHS policy and are covered by our Global EHS Management System. In 2021, no incidents of non-compliance with environmental laws and regulations were recorded through our internal systems. Relevant departments and business units focus on monitoring and mitigating risks related to energy consumption, CO<sub>2</sub> emissions, waste and water usage.

We will continue to exploring the possibilities to further reduce

Continues

## ALK follows internationally recognised standards:

- Greenhouse Gas Protocol
- EU Taxonomy

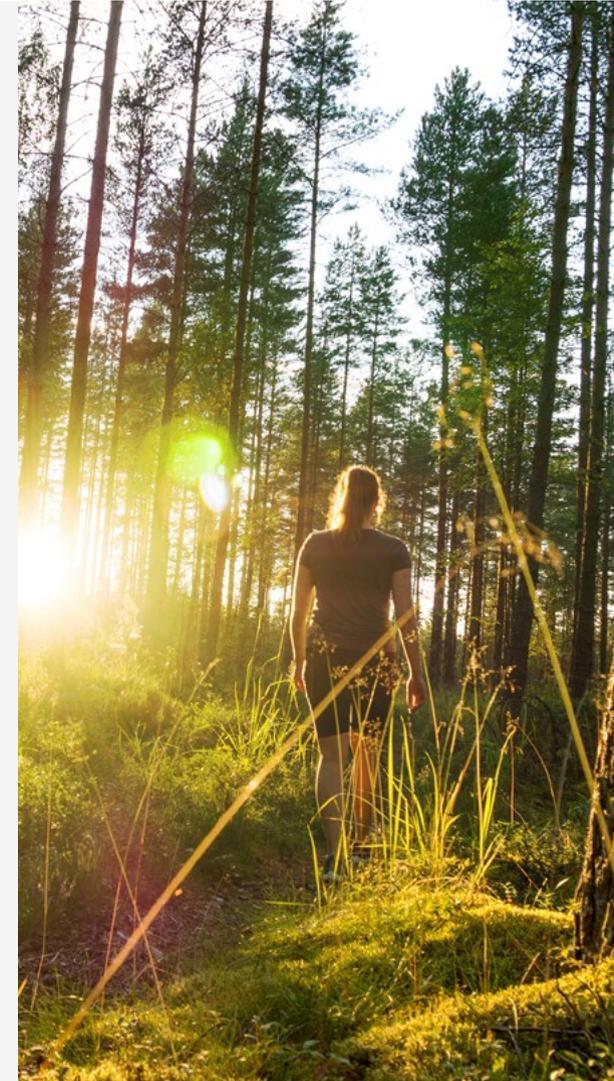
## ALK policies on environment and climate:

- Code of Conduct
- Sustainability Policy
- Environment, Health and Safety Policy



## In this area we support:

UN Global Compact Principles 7-9  
<https://www.unglobalcompact.org/what-is-gc/mission/principles> and UN Sustainable Development Goals 6,7,12,13  
<https://sdgs.un.org/goals>





The environment and climate are carefully considered throughout every step of our value chain. Sorting our waste into various recyclable categories contributes to creating a more circular economy.

greenhouse gas emissions, water consumption and waste, to prepare for potentially setting science-based targets, as described in the Science Based Targets initiative (SBTi).

### **Waste management**

Reducing, reusing and recycling our waste are important steps in minimising our environmental impact. At our site in Post Falls, USA, part of the nutritional content from the house dust mites that we cultivate is used as a soil supplement for the fields where we harvest grass and tree pollen. The remaining house dust mite process material is sold as a bulking agent for waste water treatment facilities. In addition, our site in Oklahoma, USA has installed new recycling streams, introducing paper, wooden pallets and hazardous waste to the recovery cycle. As a result, 38% more waste is reused, versus zero in 2020.

Furthermore, our team in France has embarked on a journey to optimise waste management, with the aim of achieving zero landfill waste and increasing waste recovery.

To achieve this objective, a new waste management provider introduced five recycling streams through the use of waste-specific containers. As a result, no waste is being sent to landfills and 40% of waste is now being recycled at ALK France.

In the future, further emphasis will be placed on improving waste sorting and handling expiry dates for chemicals, in order to avoid unnecessary waste.

### **We reused or recycled waste:**

# 50%

We achieved our target for 2022: to reuse or recycle 47% of waste on a global level

### **Water**

Water is an important resource for the production of our natural allergenic source materials such as pollen from grass, trees or ragweed.

We have set ourselves an ambitious target which is to keep our annual water consumption at or below our 2019-baseline of 122,000 m<sup>3</sup>.

Water consumption at our plants in Denmark, France and Spain was unchanged in 2021, despite increase in output.

However, due to an unusually warm summer at our site in Post Falls, USA, our total water consumption increased to 128,000 m<sup>3</sup> in 2021.

Continues

**“Waste management is a key priority to increase recycling at ALK. Moreover, by sorting at the source, we control the costs of processing the materials, which allows us to be more efficient.”**

**Eddy Pierron, EHS Manager at our Vandeuil site in France**

The potential consequences of climate change motivates us to take positive action to mitigate its effects. We continue to investigate opportunities to reduce our water consumption going forward.

#### Our water consumption in 2021:

# 128,000 m<sup>3</sup>

Our target for 2022 is to not exceed our 2019 baseline of 122,000 m<sup>3</sup>

For example, we are taking preventative action as heavy rain and flooding have become an increased concern in some of our US production sites. Therefore, we are investing in new drainage systems to help prevent flooding and manage water usage at the affected facilities.

Additionally, we have initiated a replacement of our WFI production system in Hørsholm, Denmark, an industrial water treatment system. When this installation is completed in 2023, we will save on both water and energy consumption.

#### EU taxonomy

ALK is currently not eligible to report under Article 8 of the EU Taxonomy. However, we acknowledge that our sector may become eligible sometime in the future. We also acknowledge our responsibility to do what is needed, regardless of reporting requirements, to mitigate and adapt to climate change in our business.

#### Climate mitigation and adaptation

Our geographical spread calls for risk planning in order to avoid emergencies, such as lack of, or poor access to raw materials like pollen. We are looking into mitigation strategies to implement at our production sites that frequently experience droughts and water scarcity.

Because our pollen source materials are cultivated in nature, they could potentially be affected by short- and long-term changes to the climate.

To mitigate risks from long-term changes in the climate, we are distributing our crops across a wider range of locations in the USA and Europe

to secure a stable supply of allergenic source materials.

#### Biodiversity

ALK acknowledges the importance of biodiversity and is taking steps to make a positive impact on increasing biodiversity. In our facilities at Post Falls, USA, we rotate the crops seasonally to ensure rich soil and minimise the use of pesticides.

#### Energy

Several initiatives were started in 2021 to support our target of maintaining energy consumption within our 2019 baseline of 47,000 MWh by 2025.

#### Our energy consumption in 2021:

# 46,000 MWh

We achieved our target for 2022 to not exceed the 2019 baseline of 47,000 MWh

We have installed LED lighting and motion sensors in ALK facilities to reduce energy consumption during the night. We also implemented a new

ventilation system in production sites to reduce energy consumption during the evening.

#### CO<sub>2</sub>

Reducing 60% of global CO<sub>2</sub> emissions at ALK calls for immediate action. We aim to reduce emissions from non-renewable sources including transport, business air travel and company cars from our 2019 baseline by 2025.

We reduced our Scope 1 and 2 emissions, including refrigerants, by 42% in 2021 down from the baseline of 12,213 tonnes in 2019 to 7,130 tonnes in 2021. This reduction stems from a focused transition into renewable sources and shift in energy mix from e.g. natural gas to electricity. We are continuously investigating possibilities to accelerate this transition even further.

#### Our CO<sub>2</sub> reduction:

# 42%

Compared to the 2019 baseline of 12,213 tonnes



LED lighting and motion sensors contribute to reducing our energy consumption at our production facilities and offices.

For example, our production site at Varennes, France transitioned to 100% renewable energy in 2021, making it our first site fully powered by renewable sources. ALK production sites that currently do not have access to renewable energy sources use Renewable Energy Certificates, which are audited by independent third parties, to supplement its use of electricity from non-renewable sources.

In addition to reducing our Scope 1 and 2 emissions, we aim to secure a robust data foundation for Scope 3 emissions. We are focusing on the most material emission sources including transport,

business air travel and company cars. We are establishing models to secure consistent and global data from our suppliers.

In order to reduce Scope 3 emissions, we have implemented a “green fleet policy” in Denmark in 2021 and will continue adding electrical cars to our company fleet as soon as local infrastructures allow for the transition.

Our work to secure valid and robust Scope 3 data will continue in 2022, and we will continue investigating potential, material categories to include in our Scope 3 reporting.

“ The most important thing for ALK is to engage in activities that make a real difference. We are implementing new, lower-emitting distribution paths. However, the biggest contribution to emissions reductions will come through energy efficiency initiatives and increasing the share of renewable energy used in our operations”

**Christian Houghton, Executive Vice President, Product Supply**

**Find out more**

See the detailed data on [page 30 in the ESG key figures](#)



# Responsible business practices

# Responsible business practices

At ALK, we are committed to conducting business ethically and complying with all relevant laws, guidelines and international standards in every aspect of our operations.

Our Code of Conduct describes the required standards of behaviour for our interactions with stakeholders and outlines our expectations of employees when it comes to professionalism, honesty and integrity. The Code of



**In this area we support:**

UN Global Compact Principles 10 <https://www.unglobalcompact.org/what-is-gc/mission/principles> and UN Sustainable Development Goals 16 <https://sdgs.un.org/goals>

Conduct contains summarised versions of all broadly relevant internal policies and reflects international standards.

**Continuous training efforts**

Internal training on the requirements of our Code of Conduct is carried out every year online, using relevant examples and posing useful dilemmas that are applicable to our industry. All employees are also required to acknowledge that they have read and understood the Code of Conduct. Training and acknowledgement are available in eight languages. In 2021, 97% of our employees completed the internal Code of Conduct training.

**Interaction with healthcare professionals**

Transparent and ethical interactions with healthcare professionals and their organisations are an important part of our work.

Continues

**ALK follows internationally recognised standards:**

- European Federation of Pharmaceutical Industries and Associations (EFPIA)
- The Ethical Committee for the Pharmaceutical Industry (ENLI)
- The International Federation of Pharmaceutical Manufacturers and Associations (IFPMA)
- The UK Bribery Act
- The US Foreign Corrupt Practices Act
- The Universal Declaration of Human Rights

**ALK policies for responsible business practices:**

- Anti-corruption Policy
- Code of Conduct
- Data Ethics Policy
- Data Protection Policy
- IT Security Policy
- Third Party Code of Conduct
- Quality Manual
- Stakeholder & Communications Policy
- Sustainability Policy
- Tax Policy
- Whistleblowing Policy

**Find out more**

about our code of conduct: <https://www.alk.net/code-conduct>



Promotional material must be accurate, balanced, fair and approved by a medically qualified signatory, prior to publication. In addition, ALK strives to develop promotional material that is unbiased and representative of the local population.

**Responsible tax management**

ALK’s tax policy applies to all ALK companies and our foreign branches and representations globally. The policy covers both direct and indirect taxes. Responsible tax management implies a commitment to tax compliance including a focus on complying with transfer pricing requirements by applying the ‘arm’s length’ principle to all intercompany transactions, in line with applicable best practice guidelines issued by the OECD.

**Interactions with suppliers and other third parties**

The main elements of our current standard supplier and third party contracts include topics relating to human rights, labour rights, environment and anti-corruption. In 2021, we defined a Third Party Code of Conduct which specifically outlines

our expectations for interactions with suppliers and third parties. Building on our current policy, this code will cover our business relationships with all suppliers going forward.

We conduct an overall risk assessment of our direct suppliers on a regular basis. The majority of our spend is placed with international, well-established suppliers to the pharmaceutical industry. More than 99% of our major suppliers are located in Europe and North America, regions with historically low risk in regards to responsible business practices.

No observations of violations were made in supplier assessments in relation to human rights, labour rights, the environment, and anti-corruption in 2021.

In 2022, ALK will continue to improve the risk assessment process for third parties by digitalising the process and broadening its scope to enable more accurate and documented risk assessments, that will further enhance our interactions with critical suppliers.

Continues ▶

We pride ourselves on transparent and ethical interactions with healthcare professionals.



▶ **Find out more**  
about our tax policy:  
<https://www.alk.net/sustainability>



We require our suppliers to meet our high expectations on human rights, labor rights, and anticorruption.

### **Forced and child labour**

We have a zero tolerance towards child and forced labour, as clearly stated in our Third Party Code of Conduct. As a part of our due diligence process for suppliers and third parties, we assess the risk of child and forced labour. We adhere to the 2015 Modern Slavery Act and publish an annual statement according to its requirements.

### **Anti-corruption**

We are committed to working against corruption in all its forms, and we take a zero-tolerance approach to corruption, including facilitation payments, kickbacks, fraud and bribery. No ALK employees are allowed to accept gifts of significant value.

We have expanded our Code of Conduct specifically to mitigate the risk posed by conflicts of interests among our employees. We did not observe any corruption cases in 2021.

### **High quality healthcare products**

Quality is a strategic priority for ALK, as it concerns both patient safety and public health and ensures

standardisation and consistency of our products.

Meeting quality standards in our production and manufacturing processes is a prerequisite for ALK's licence to operate and our competitive strength. We adhere to GxP requirements which are described in various procedures within our Quality Management System. To mitigate risks, we invest significantly in ensuring robustness and compliance in our processes, personnel training and manufacturing facilities.

Production and manufacturing processes are subject to periodic and routine inspections by regulatory authorities. In 2021, three authority inspections of our manufacturing sites were successfully completed, two of which were performed on-site, while the other was performed remotely.

### **Patient safety**

ALK has a rigorous safety reporting system in place ensuring that safety data from any source, including clinical trials, are collected and analysed systematically by ALK's global

pharmacovigilance team. This ensures that the safety profile of our products stays beneficial, and the relevant authorities can be made aware of any safety issue arising from our products.

The overall risk of counterfeiting ALK medicines is considered low. The main risks, in connection with our products, come from failures to report side effects. We monitor the effects of our products both before and after they gain marketing authorisations. If a situation should occur in which it is necessary to recall a product, despite high levels of quality and safety, ALK has procedures in place to ensure swift and efficient management of the situation. During 2021, ALK issued one product recall notice. A small number of products with the wrong strength were shipped, resulting in a voluntary recall of the affected product in Italy.

In 2022, we will further develop the quality mindset across the organisation by continuing to train our employees, roll out systematic problem-solving tools, and develop employees through our online training framework.

### Clinical trials

Safety, privacy, ethics and respect are the foundation of our clinical trials, which we conduct in close collaboration with healthcare professionals, scientists and people with allergy. We are also committed to the EFPIA's and the Pharmaceutical Research and Manufacturers of America's (PhRMA) Principles for Responsible Clinical Trial Data Sharing in a manner that safeguards the privacy of patients, respects the integrity of national regulatory systems, and protects proprietary information.

### Data ethics

As a pharmaceutical company, we process data in several different ways: clinical trials, research and development, human resources, customer interactions and pharmacovigilance. We utilise data to expand scientific and medical understanding, ensure patient safety, to generate a firmer evidence base to improve our products and services, and to deliver treatments to the right patients with the right commercial potential, efficiently and sustainably.

Our Data Ethics principles include following applicable data ethics laws, respecting people's privacy, ensuring ethical considerations, sharing data responsibly, and avoiding bias when using algorithms. We apply our Data Ethics Principles in the absence of formal legal requirements. The management of data ethics is carried out by relevant business units, who have integrated these principles in their work. We commit to mitigating risks and resolving grievances, through our internal procedures or, if relevant, in collaboration with stakeholders. This constitutes our reporting according to cf. section 99d of the Danish Financial Statements Act.

### Privacy and data protection

In 2021, we continued to work on ensuring the safety and responsible use of data in line with data protection regulations like the General Data Protection Regulation (GDPR). There were no data breaches reported in 2021.

We initiated a global training campaign specifically focusing on avoiding

Continues

**Find out more** about the 2021 UK Modern Slavery Act statement: <https://www.alk.net/sustainability>

**Find out more** about our anti-corruption policy: <https://www.alk.net/sustainability>



When working with data, relevant business units ensure ethical considerations.

phishing attacks. Furthermore, mobile phones were upgraded to a new security platform to better safeguard company data, and this was further supported by targeted awareness training on the handling of personal data.

**Animal welfare**

Animal welfare is a focus throughout our research and development of new medicines. We select professional animal suppliers, who are well recognised, and accredited, according to the Federation of European Laboratory Animal Science Associations’ (FELASA) guidelines, to serve the pharmaceutical industry. Our commitment to animal welfare also covers the shipment and transport of animals to our animal facilities.

Alternative approaches to replace the use of animals are implemented whenever possible. This strategy is known as ‘the three R’s: replace, reduce and refine. ALK also strives to avoid any unnecessary repetition of animal studies. ALK conducts testing

on the cellular level whenever possible to minimise the number of animals needed for research.

**Ethics hotline: ALK Alertline**

We encourage both employees and other stakeholders with a work-related connection to ALK to report, in good faith, serious and sensitive concerns falling within the scope of our Whistleblowing Policy.

Guidance on the various ways in which employees can raise concerns, and how to approach situations where they believe the Code of Conduct may have been violated, are part of the annual training. Both employees and other relevant stakeholders can file a report via the ALK Alertline in multiple languages, either by telephone or via an online form. In 2021, a total of eight cases were raised via ALK Alertline or other channels. All relevant cases were diligently investigated, and appropriate remedial and disciplinary actions were taken.

▶ **Find out more**  
about our data ethics policy:  
<https://www.alk.net/sustainability>

▶ **Find out more**  
about our code of conduct, Data Protection Policy:  
<https://www.alk.net/code-conduct>

▶ **Find out more**  
if you want to contact the external Alertline:  
<https://secure.ethicspoint.eu/domain/media/en/gui/33411/index.html>



A photograph of a field of green plants with tall, thin stalks and small, light-colored flowers. The plants are in the foreground, and the background is a blurred green field under a bright sky.

# ESG key figures

# Our work with sustainability

## Sustainability reporting principles

ALK uses Global Reporting Initiative's (GRI) Sustainability Standards as guidance to determine report content in terms of stakeholder inclusiveness, context, materiality and completeness. The report's quality is defined by balance, comparability, accuracy, timeliness, clarity and reliability.

The reporting period covered by this report extends from 1 January 2021 to 31 December 2021.

## Reporting scope

The environmental data in this report covers only ALK's production sites in the USA, Denmark, Spain and France. All other data regarding human rights, labour rights and responsible business practices cover the entire ALK group, unless otherwise specified. Data from 2019 is used as the baseline for our sustainability work and reporting.

## Governance

ALK's sustainability planning and activities reflect actual and potential risks and opportunities covering human rights, labour rights, climate and environment, and anti-corruption – directly or via ALK's suppliers and partners.

## Due diligence, risk management and grievance mechanisms

The ALK Risk Committee assists the Board of Management with the overall responsibility of risk management. The ALK Risk Committee meets at least twice a year. The committee assesses risks and mitigation strategies relating to the entire ALK Group, including risks that could prevent us from reaching strategic and financial goals. ALK takes additional responsibility by vetting relevant external partners through the Procurement and Legal departments to minimise risks.

## Transparency

Our commitments, efforts and goals are disclosed in our Sustainability Report and on our website, and follow the Danish Financial Statements Act sections 99a, 99b, 99d and 107d. Further details of the risks associated with the Danish Financial Statements Act can be found in ALK's Annual Report.

➤ Find out more about our organisation: <https://www.alk.net/sustainability>

## Governance structure



## ESG key figures – Environment and climate

	Unit	2021	2020	2019
<b>CO<sub>2</sub> emissions</b>				
Total CO <sub>2</sub> emissions (Scope 1, Scope 2, refrigerants)	Tonnes	11,258	11,263	12,213*
Renewables	Tonnes	4,128	3,872	2,569
CO <sub>2</sub> emissions (less renewables)	Tonnes	7,130	7,391	9,644
Emissions intensity (GHG)	Ratio	4.69	5.05	6.98
<b>Reduction in CO<sub>2</sub> since 2019</b>	<b>%</b>	<b>42%</b>	<b>39%</b>	<b>-</b>
<b>Energy consumption</b>				
Natural gas	MWh	15,914	15,275	15,594
Gas oil	MWh	1,542	1,270	1,171
Diesel	MWh	153	352	215
Electricity	MWh	24,289	23,814	23,817
District heating	MWh	3,788	4,730	5,965
Energy intensity	Ratio	30.06	31.06	33.84
Renewable energy share	%	45	38	20
<b>Total energy consumption</b>	<b>MWh</b>	<b>45,686</b>	<b>45,441</b>	<b>46,762*</b>
<b>Water consumption</b>				
<b>Total Total water consumption</b>	<b>m<sup>3</sup></b>	<b>127,520</b>	<b>110,530</b>	<b>122,461*</b>
<b>Waste</b>				
Waste from production sites – recycled	Tonnes	441	325	334
Waste from production sites – landfill	Tonnes	227	341	165
Waste from production sites – other	Tonnes	212	188	383
Total waste from production sites	Tonnes	880	853	882
<b>Waste recycled from production sites</b>	<b>%</b>	<b>50</b>	<b>38</b>	<b>38*</b>
<b>Environmental management</b>				
Breaches of regulatory limit values	# of incidents	0	0	0
Environmental policy	Yes/No	Yes	Yes	Yes
Climate oversight/management	Yes/No	Yes	Yes	No

\*Baseline for improvement target

## ESG key figures – People/Social

	Unit	2021	2020	2019
<b>Engagement</b>				
Participation rate	%	93	N/A	N/A
Engagement score	Index points	8.2	N/A	N/A
<b>Employees</b>				
Workforce	Headcount	2,593	2,486	2,406
Gender diversity (total)	% female	63	63	62
Gender diversity (all management levels)	% female	49	46	47
Gender diversity (VP & Senior Director)	% female	29	26	N/A
Gender diversity (Manager & Director)	% female	53	51	N/A
Gender Pay Ratio (men to women)	Times	1.18	1.14	1.13
Employee turnover ratio	%	13	10	11
CEO pay ratio	Times	34	34	29
Non-discrimination policy	Yes/No	Yes	Yes	Yes
New hires	#	487	420	352
Female new hires	%	58	66	62
<b>Health &amp; safety</b>				
Lost time injury frequency	LTIF	0.3*	2.9	3.5
Accidents with absence	Times	1	9	15
Absence due to sickness	%	3.1	3.1	2.7
Global health & safety policy	Yes/No	Yes	Yes	Yes
Child & forced labour policy	Yes/No	Yes	Yes	Yes

\* LTIF includes all work-related injuries resulting in an individual being physically or mentally unable to work. In 2021, injuries were only included if diagnosed by a competent medical professional.

## ESG key figures – Responsible business practices

	Unit	2021	2020	2019
<b>Business ethics</b>				
Alertline cases	#	8	6	8
Cases related to discrimination	#	0	0	1
Amount contributed to political parties	DKK	0	0	0
Breaches of data protection incidents submitted to the national Data Protection Agency	#	0	0	3
<b>Governance</b>				
Board diversity	% female	33	20	17
Board independence	%	50	40	50
Board meeting attendance rate	%	94	98	97
Supplier code of conduct	Yes/No	Yes	No	No
Ethics & anti-corruption policy	Yes/No	Yes	Yes	Yes
Code of Conduct employee certification	%	97	94	90
Data privacy policy	Yes/No	Yes	Yes	Yes
GDPR compliant	Yes/No	Yes	Yes	Yes

## Definitions of calculations

### Environment and climate

All environmental data is reported for production sites only (Hørsholm, Madrid, Vandeuil, Varennes, Port Washington, Post Falls and Oklahoma). ALK follows the Global Reporting Initiative (GRI) Standard 305.

### CO<sub>2</sub> emissions

ALK adheres to the principles of the Green House Gas Protocol (GHG protocol) when reporting on GHG emissions. Emissions are measured in metric tonnes and include all material types of fuels and refrigerants like HFCs, natural gas, gas oil, diesel, and heating. Emission intensity is calculated by dividing total Scope 1 and 2 emissions including refrigerants by cost of sales. CO<sub>2</sub> reduction annually is calculated as: “Total scope 1+2 and refrigerants” minus “CO<sub>2</sub> emissions minus renewables” divided by “total scope 1+2 and refrigerants” using 2019 as a baseline.

### Energy

Energy consumption includes natural gas, gas oil, diesel, electricity and district heating. Energy consumption is calculated in MWh based on meter readings and invoices of all energy types at production sites. Energy intensity is calculated as total energy consumption divided by cost of sales. The share of renewable power used at production sites is reported according to the Greenhouse Gas (GHG) Protocol Scope 2 Guideline. It is calculated as the sum of power in each country that comes from 100% renewable sources, either sourced or self-produced.

### Water

Water consumption is measured by meter readings in all production sites. It includes water

for irrigation, cooling, industrial and drinking from production sites.

### Waste

Waste is calculated by the sum of weight of each category (recycled, landfill, hazardous) at each production site.

### People/Social Engagement

Participation rate and engagement score are collected from a survey conducted by a third party.

### Employees

All employee-related data is downloaded from our internal HR-system Workday, except for Lost Time Incident Frequency data, which is reported directly from the Environmental, Health & Safety department. All employee data in this report is presented as headcount. Workforce is calculated as the sum of permanent and temporary employees on 31 December 2021. Part-time work is defined as any work below the local national standard in the countries in which we operate. Temporary employment is defined as employment, with a pre-agreed end-date.

Gender diversity is calculated as the percentage of women in the total company, Vice President and Senior Director levels, and Manager and Director level. The figures in 2020 do not include Germany, as job grades were not yet approved by the worker’s council.

The gender pay ratio is calculated by comparing the median total compensation of men to women, excluding the salary of the CEO.

The turnover ratio is calculated by dividing the number of employees who left the company by the average number of employees in the reporting year. Number of new hires is measured as the total number of new full time employees and the percentage of female hires.

### Health & safety

Lost time injury frequency is defined as a work-related Injury resulting in an individual being physically or mentally unable, as determined by a competent medical person, to work on the next scheduled day or shift, resulting in at least one day off the job (no. of accidents\*1.000.000)/(FTE hours).

Absence due to sickness is calculated as number of total working days with absence due to sickness, divided by total working days.

### Responsible business practices

#### Business ethics

Alertline cases are taken from our external system Ethics Point. Code of Conduct training is calculated by the percentage of employees completing the training based on internal registrations.

#### Governance

Board diversity is measured by the percent of female non-executive members. Board independence is measured by the percent of independent, non-executive members. The Board Meeting Attendance rate is calculated as (number of meetings\*number of members)-meetings not attended / (number of meetings\*number of members)\*100.

The CEO pay ratio is calculated as total compensation divided by median staff total compensation.

### Disclosure requirements, cf. §99a, 99b, 99d and 107d of the Danish Financial Statements Act

Disclosure requirements	See page
<b>99a</b>	
<b>Policies on</b>	
Human rights	14-17, 25-29
Worker and social conditions	14-17
Environment and climate	20-23
Anti-corruption	25-29
<b>Activities during the year</b>	
Human rights	14-17, 25-29
Worker and social conditions	14-17
Environment and climate	20-23
Anti-corruption	25-29
KPIs and results	7
Sustainability risks	20-23, 29
<b>99b</b>	
Diversity in management	15
Diversity in the Board of Directors	16
<b>99d</b>	
Data ethics policy	28
<b>107d</b>	
Diversity & inclusion policy	14-16



**ALK-Abelló A/S**

Bøge Allé 6-8

DK-2970 Hørsholm, Denmark

CVR no. 63 71 79 16

Tel. +45 45 74 75 76

[www.alk.net](http://www.alk.net)

