

Corporate reporting in light of CSRD:

Meaningful communications are challenged by compliance-driven annual reports



By CEO and communications advisor Lars Sandstrøm, Corporate Relations

The largest Danish companies have submitted their first annual report fully complying with the Corporate Sustainability Reporting Directive (CSRD). These reports are quite comprehensive, data-driven and technical when it comes to the integrated sustainability statement. But two questions must be asked: Do the current annual reports communicate in a meaningful way, and do they drive action?

My assessment of around 50 Danish large (primarily listed) companies' annual report is clear: They are playing by the book and have launched reports that are very true to the prescription defined by the European Sustainability Reporting Standards (ESRS). Danish companies are best-in-class – at least when it comes to compliance.

Beyond compliance

However, when it comes to sustainability there is potentially a big difference between reporting for compliance and communicating in a meaningful way - and even between being compliant and conducting real, impactful and business-oriented action.

One could fear that time and resources have been spent on administrative burdens and less on pursuing business opportunities related to the implementation of innovative and sustainable solutions. This is of course also the evaluation coming from EU, and the reason for the Omnibus Regulation packages presented the 26 February 2025. The purpose of this is obviously to reduce bureaucracy and administrative burdens.

A potential for meaningful communication

As a communications advisor, I am primarily concerned that annual reports are getting too complex and too technical for the average reader to comprehend. That is not the spirit of the new regulations. By contrast, with the integration of sustainability in the annual report, you are (potentially) broadening the audience of the report from a group of primarily financial institutions, analysts, investors and regulators to a group also including organizations, partners, employees and even customers and consumers.

It remains to be seen whether companies are able to communicate in a relevant and meaningful way to this broader target audience, or whether the potential for good and effective communication are drowning in the sea of bureaucracy, rules and regulations – or whether the new Omnibus package will be a push in another direction.

Guidelines for inspiration

In this article, I am providing 10 guidelines to improving the communication of value creation in the integrated annual report. These guidelines are not changing the concept, form and structure of a typical annual report. On the contrary, I am presenting best practice examples of elements that are already present in some annual reports from Danish companies. As such, it is my hope that these guidelines and examples will provide ideas and inspiration to other companies in their efforts to improve corporate reporting going forward.

Guideline #1

Create a concise equity story

– the reason to invest and do business with your company

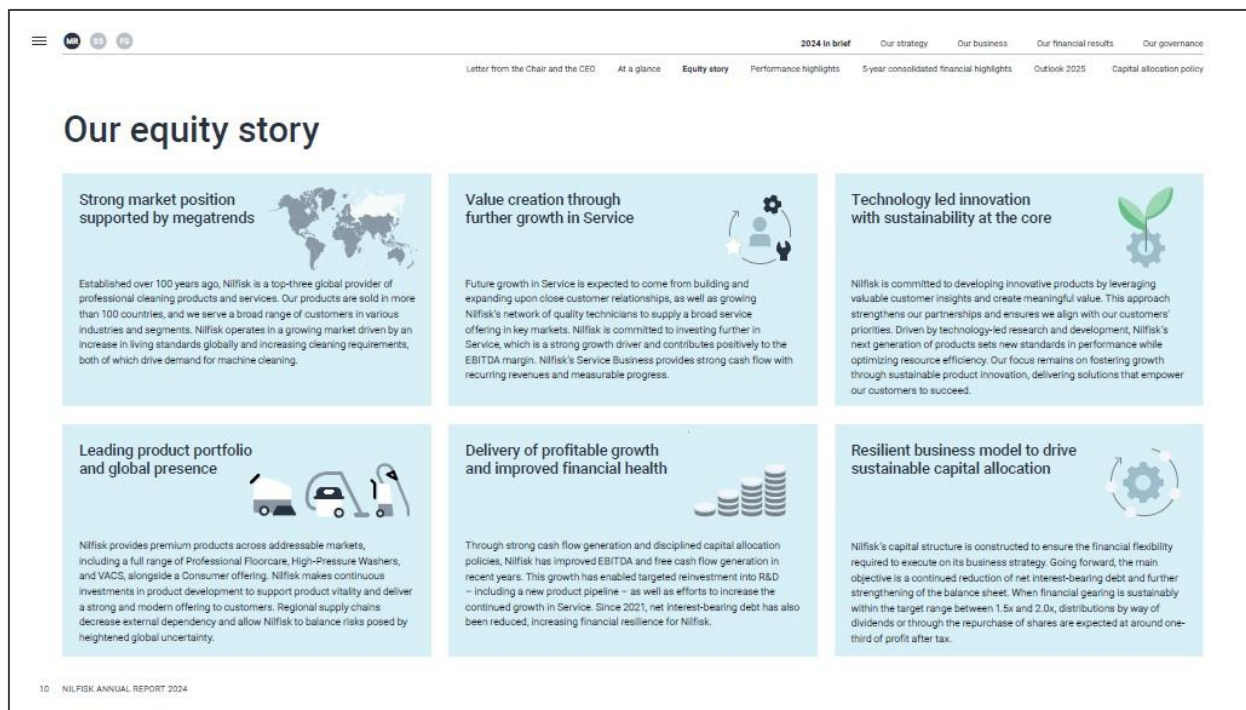
You could say that all a company communicate is part of the common equity story. You could even say that the equity story – like a brand image – is co-created by all internal and external stakeholders. However, many companies are also directing readers' attention to an official equity story in the annual report.

This equity story can be directed towards potential investors with a headline like: Why invest in our company? But some are presenting a broader equity story communicating why different stakeholders should choose to have relations with the company. In this way the equity story is taking form of a corporate story.

There are differences in the building blocks of the equity story. Some have a financial focus with technical arguments for an investment, while others have a more holistic focus including elements like culture, working conditions, products and services, sustainability measures, management, ethics, and image. Elements

that are typically directed towards customers, partners, political decision makers and employees.

The tone-of-voice, format and topics covered are very much dependent on the purpose of the story and the stakeholders you want to approach.



Nilfisk presents the equity story in a brief and appealing way with a focus on relevant reasons to invest in the company.

Guideline #2

Make an appealing executive letter to describe performance, progress and plans

With the integrated annual report increasing in number of pages and complexity, the executive letter should take a more prominent and important position in the report. Many readers may only read the letter and skim the rest of the report. This makes it a case with a need for special attention.

In many annual reports the letter is co-written by the chairman of the Board and the CEO. This is a way to demonstrate that top management is following and agreeing on a common and coordinated strategic course for the company. Two letters are not recommendable, as the messages tend to overlap or signal that the Board and executive management have two different takes on the company results and progress. One common letter signals alignment.

The letter should be neutral but personal. The current figures should be presented and explained, and the expectations for the future should be communicated in

light of historic experiences, market trends and business risks. However, the letter should leave room for analytic assessment and evaluation.

The letter should not be emotional. But it should demonstrate a human touch in recognizing the efforts of employees and partners, in describing the role of purpose, values and culture, and by communicating how the company is handling its impact on environment, people and society.



The CEO and Chair of ISS are describing the results and value creation achieved in 2024 but also use the letter to explain the transformation of the company and business.

Guideline #3

Illustrate the business model to clarify the foundation for value creation - now and in the future

The communication about business model has taken a more and more prominent role in corporate reporting in recent years. This is not only related to the need for compliance, but to the readers it also serves as a shortcut to understanding how the company creates value and how it is positioning itself in the value chain.

The business model typically describes the resources/input that companies are relying on, the operations (the core business) that defines the unique offering, and the value creation/output or impact that is the result of the business operations. Often some kind of value or supply chain is included in the model as well as the purpose.

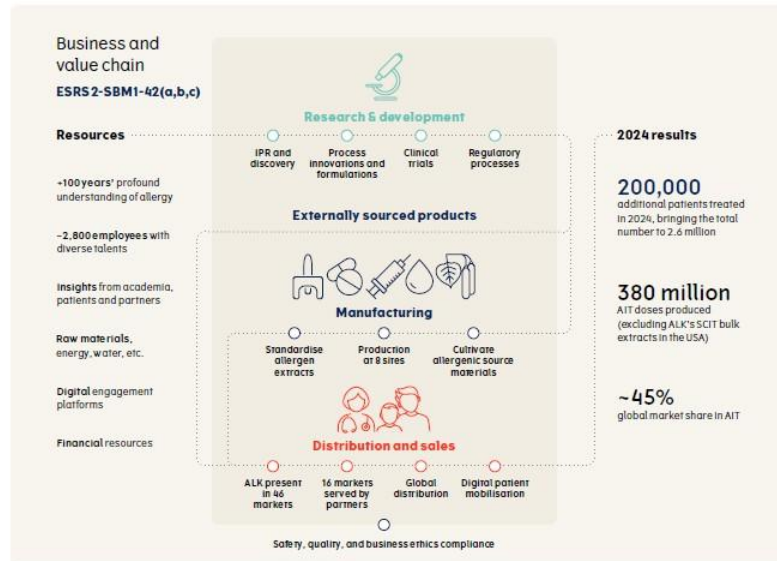
It is a clear trend that the business model visualization as well as description has been improved for many companies in recent years. But the content of the business model has also changed for companies who see a need to include a stronger focus on impacts, risks and opportunities related to a focus on ESG topics. In this way, the business model is moving from a shareholder to a stakeholder perspective and presents a balanced and holistic perspective on the value creation of the business.

Business model

ALK's business model is based on unique production processes, immunology insights, strong research and development skills, and commitment to applying modern science to allergies as well as a comprehensive commercial infrastructure, especially in Europe.

ALK's activities cover the entire value chain of developing, sourcing, producing, and marketing a diversified portfolio of products for diagnosing and treating allergies, allergic asthma, and acute anaphylactic reactions.

Naturally sourced allergens (proteins) are vital active pharmaceutical ingredients in ALK's core AIT products. ALK's unique manufacturing processes ensure its products meet required quality standards and represent a significant entry barrier to potential competitors, ensuring sustained market exclusivity for ALK.



ALK's business model is illustrated in a simple and easy-to-understand way showing both the internal processes, the resources used, and the results created in 2024.

Guideline #4

Explain the company's position and role in relation to current trends in industry, market and society

It's relevant for companies to describe how they are responding to trends in society, market, and industry to be able to meet customers' and consumers' demands - and to be able to develop a unique position and brand image.

There are many ways to describe trends. Some describe business opportunities in the light of general megatrends, some describe external and internal trends affecting their business in both positive and negative ways, and some describe specific industry and market trends, their impact on business strategy and operations and how the company responds to these trends and impacts.

Reflecting on trends is a way to demonstrate that the business model, strategy and position of the company are aligned with the current development in technology, markets and regulations, and that the company's products and services is relevant now as well as in years to come. Companies analyzing and understanding the implications of trends are also the ones that are able to respond and to be innovative in order to maintain or further develop a unique market position.

22 NKT A.S. Annual Report 2022

MARKETS AND MEGATRENDS

Markets and megatrends

As a pure-play power cable solutions provider, NKT delivers comprehensive solutions to facilitate the transmission and distribution of electricity from generation to consumption. The offering ranges from high-voltage offshore and onshore power cables solutions, to medium-voltage distribution cable solutions, to low-voltage cables and building wires. Across market segments, technological advancements have been pivotal in driving market growth, ensuring efficient and safe power transmission of energy and reinforcement of power grids. Looking ahead, continued growth is anticipated across the different segments.

Sustainability

The high demand for power cable solutions, which is essential for power transmission and distribution, is expected to continue to drive growth. Continued investment in research and development is expected to drive growth, with a focus on developing innovative solutions to meet the growing demand for power cable solutions. The high demand for power cable solutions is expected to drive growth, with a focus on developing innovative solutions to meet the growing demand for power cable solutions.

Expected impact on power cable market segment:

| High-voltage | Low- and medium-voltage | Services |
|--------------|-------------------------|----------|
| High | High | Medium |

22 NKT A.S. Annual Report 2022

MARKETS AND MEGATRENDS

Markets and megatrends

Electrification

The transition to a low-carbon economy is driving demand for power cable solutions. The growing demand for power cable solutions is expected to drive growth, with a focus on developing innovative solutions to meet the growing demand for power cable solutions.

Digitalisation

Digitalisation continues to be a key driver of growth. The growing demand for power cable solutions is expected to drive growth, with a focus on developing innovative solutions to meet the growing demand for power cable solutions.

Expected impact on power cable market segment:

| High-voltage | Low- and medium-voltage | Services |
|--------------|-------------------------|----------|
| High | High | Medium |

NKT is describing markets and megatrends, and how these trends are expected to impact on the power cable market in the short-, medium- and long-term perspective.

Guideline #5

Illustrate and explain the position and significance of material topics as part of the value chain

An illustration of the value chain can serve several purposes. It should illustrate the services, products or solutions that the company is providing as a part of a larger B2B value chain – or in a direct relation with customers or consumers. The value chain should include the resources provided upstream, the company's operations and the positive and negative impacts related to its downstream activities.

The value chain could be a linear process, but it could also illustrate as a circular process including regenerative processes with a focus on recycling.

Some value chains are very specific in their design and explanation on the specific processes carried out in different parts of the value chain. This is insightful. However, it is also recommended to illustrate if these processes – and the included stakeholder relations – are connected to specific material topics (defined by a double materiality assessment (DMA)).

Illustrating and mapping your value chain is an integrated part of the DMA process that not only forces you to discuss how relations and processes should be presented externally. It also serves as an internal tool for discussing how the company operates, if impacts and risks could be reduced, and if changes could be made to reap more benefits from the company's role and position in the value chain.

| Management review | | Sustainability statement | | Financial statements | | FLSmidth Annual Report 2024 | | 73 | |
|--|--|--|--|--|--|--|--|--|---|
| General | | Environment | | Social | | Governance | | | |
| Impacts, risks and opportunities across our value chain | | | | | | | | | |
| | | | | | | | | | |
| ESRS E1 Climate change | <ul style="list-style-type: none"> CO₂ emissions → Page 83 | <ul style="list-style-type: none"> CO₂ emissions → Page 83 Energy optimisation → Page 84 | <ul style="list-style-type: none"> CO₂ emissions → Page 83 MissionZero portfolio → Page 84 | <ul style="list-style-type: none"> CO₂ emissions → Page 83 MissionZero portfolio → Page 84 | <ul style="list-style-type: none"> CO₂ emissions → Page 83 MissionZero portfolio → Page 84 | <ul style="list-style-type: none"> CO₂ emissions → Page 83 MissionZero portfolio → Page 84 | <ul style="list-style-type: none"> CO₂ emissions → Page 83 MissionZero portfolio → Page 84 | <ul style="list-style-type: none"> CO₂ emissions → Page 83 MissionZero portfolio → Page 84 | <ul style="list-style-type: none"> CO₂ emissions → Page 83 MissionZero portfolio → Page 84 |
| ESRS E2 Pollution | <ul style="list-style-type: none"> Air pollution from production → Page 96 | <ul style="list-style-type: none"> Air pollution from production → Page 96 Use of substances of concern → Page 96 | <ul style="list-style-type: none"> Air pollution from production → Page 96 Use of substances of concern → Page 96 | <ul style="list-style-type: none"> Air pollution from production → Page 96 Use of substances of concern → Page 96 | <ul style="list-style-type: none"> Air pollution from production → Page 96 Use of substances of concern → Page 96 | <ul style="list-style-type: none"> Air pollution from production → Page 96 Use of substances of concern → Page 96 | <ul style="list-style-type: none"> Air pollution from production → Page 96 Use of substances of concern → Page 96 | <ul style="list-style-type: none"> Air pollution from production → Page 96 Use of substances of concern → Page 96 | <ul style="list-style-type: none"> Air pollution from production → Page 96 Use of substances of concern → Page 96 |
| ESRS E3 Water | <ul style="list-style-type: none"> Water withdrawal → Page 100 | <ul style="list-style-type: none"> Water withdrawal → Page 100 | <ul style="list-style-type: none"> Water withdrawal → Page 100 | <ul style="list-style-type: none"> Water withdrawal → Page 100 | <ul style="list-style-type: none"> Water withdrawal → Page 100 | <ul style="list-style-type: none"> Water withdrawal → Page 100 | <ul style="list-style-type: none"> Water withdrawal → Page 100 | <ul style="list-style-type: none"> Water withdrawal → Page 100 | <ul style="list-style-type: none"> Water withdrawal → Page 100 |
| ESRS E4 Biodiversity | | | | | | | | | <ul style="list-style-type: none"> MissionZero portfolio → Page 100 CO₂ emissions → Page 103 Depletion of natural resources and land-use change → Page 103 Regulatory/reputational pressure → Page 104 Reducing mining footprint → Page 104 |
| ESRS E5 Circularity | <ul style="list-style-type: none"> Virgin raw materials → Page 105 Sourcing of materials → Page 105 | <ul style="list-style-type: none"> Generation of waste → Page 105 | <ul style="list-style-type: none"> Generation of waste → Page 105 | <ul style="list-style-type: none"> Generation of waste → Page 105 | <ul style="list-style-type: none"> Generation of waste → Page 105 | <ul style="list-style-type: none"> Generation of waste → Page 105 | <ul style="list-style-type: none"> Generation of waste → Page 105 | <ul style="list-style-type: none"> Generation of waste → Page 105 | <ul style="list-style-type: none"> Generation of waste → Page 105 |
| ESRS S1 Own workforce | | <ul style="list-style-type: none"> Working conditions → Page 111 Equal treatment and opportunities → Page 112 | <ul style="list-style-type: none"> Working conditions → Page 111 Equal treatment and opportunities → Page 112 | <ul style="list-style-type: none"> Working conditions → Page 111 Equal treatment and opportunities → Page 112 | <ul style="list-style-type: none"> Working conditions → Page 111 Equal treatment and opportunities → Page 112 | <ul style="list-style-type: none"> Working conditions → Page 111 Equal treatment and opportunities → Page 112 | <ul style="list-style-type: none"> Working conditions → Page 111 Equal treatment and opportunities → Page 112 | <ul style="list-style-type: none"> Working conditions → Page 111 Equal treatment and opportunities → Page 112 | <ul style="list-style-type: none"> Working conditions → Page 111 Equal treatment and opportunities → Page 112 |
| ESRS S2 Workers in the value chain | <ul style="list-style-type: none"> Adequate wages → Page 121 Health and safety → Page 121 Child labour and forced labour → Page 121 | | | | | | | | <ul style="list-style-type: none"> Child labour and forced labour → Page 121 |
| ESRS S3 Affected communities | | | | | | | | | <ul style="list-style-type: none"> Communities' economic, social and cultural rights → Page 127 Rights of indigenous people → Page 127 |
| ESRS G1 Business conduct | <ul style="list-style-type: none"> Relationships with suppliers → Page 131 | <ul style="list-style-type: none"> Corporate culture → Page 130 Protection of whistleblowers → Page 130 Corruption and bribery → Page 131 | <ul style="list-style-type: none"> Corporate culture → Page 130 Protection of whistleblowers → Page 130 Corruption and bribery → Page 131 | <ul style="list-style-type: none"> Corporate culture → Page 130 Protection of whistleblowers → Page 130 Corruption and bribery → Page 131 | <ul style="list-style-type: none"> Corporate culture → Page 130 Protection of whistleblowers → Page 130 Corruption and bribery → Page 131 | <ul style="list-style-type: none"> Corporate culture → Page 130 Protection of whistleblowers → Page 130 Corruption and bribery → Page 131 | <ul style="list-style-type: none"> Corporate culture → Page 130 Protection of whistleblowers → Page 130 Corruption and bribery → Page 131 | <ul style="list-style-type: none"> Corporate culture → Page 130 Protection of whistleblowers → Page 130 Corruption and bribery → Page 131 | <ul style="list-style-type: none"> Corporate culture → Page 130 Protection of whistleblowers → Page 130 Corruption and bribery → Page 131 |

FLSmidth determines the location of the impacts, risks and opportunities in the value chain. This makes the focus on all parts of the value chain very illustrative.

Guideline #6

Communicate progress in meeting ESG-targets in an easy-to-overview way

Target-setting and –communication is an essential discipline within corporate reporting. It is a part of being compliant with the CSRD/ESRS, and it is a way for companies to demonstrate that they are ambitious and serious in their efforts to meet important ESG goals.

Most large companies have defined and are reporting clear targets for the ESG strategy and are reporting on results and improvements on a year-to-year basis. Often these results are not only internal but are also concerning material parts of the supply chain. And when it comes to greenhouse (GHG) emissions, targets are increasingly science-based to ensure transparency and comparability, and to ensure companies are heading in the direction towards living up to the 2015 Paris Agreement.

However, it is not always clear how far companies have come on their way to meet these targets, when these targets were defined (baseline), and whether companies have reset targets in the process (often known as target-washing). Illustrations/ info-graphics including targets and progress will enhance readers' understanding and evaluation of companies' ESG measures.



Rockwool illustrates its goals and progress on eight ESG performance indicators/highlights in very simple and decodable way.

Guideline #7

Disclose the salience and engagement of stakeholders

Stakeholder analysis, engagement and mapping is a strengthened discipline in many companies. This is not the least due to the CSRD, which includes a number of provisions that are designed to improve stakeholder engagement.

For example, companies are required to disclose information about how they have consulted stakeholders in regard to the double materiality assessment and in relation to the due diligence processes that must be described in the sustainability statement. This will help to ensure that companies are taking into account the needs and concerns of their stakeholders when they make decisions about sustainability measures.

There are several ways to illustrate and describe the salience and engagement of stakeholders. However, it is essential that this overview brings an adequate image of the salience of the stakeholders and the nature of the relations and dialogue between the company representatives and defines stakeholders. Also, the outcomes of engagement and dialogue should be part of the overview of stakeholder relations.

ESRS 2, ESRS 3, ESRS 4, ESRS 5, ESRS 6, ESRS 7, ESRS 8, ESRS 9, ESRS 10, ESRS 11, ESRS 12, ESRS 13, ESRS 14, ESRS 15, ESRS 16, ESRS 17, ESRS 18, ESRS 19, ESRS 20, ESRS 21, ESRS 22, ESRS 23, ESRS 24, ESRS 25, ESRS 26, ESRS 27, ESRS 28, ESRS 29, ESRS 30, ESRS 31, ESRS 32, ESRS 33, ESRS 34, ESRS 35, ESRS 36, ESRS 37, ESRS 38, ESRS 39, ESRS 40, ESRS 41, ESRS 42, ESRS 43, ESRS 44, ESRS 45, ESRS 46, ESRS 47, ESRS 48, ESRS 49, ESRS 50, ESRS 51, ESRS 52, ESRS 53, ESRS 54, ESRS 55, ESRS 56, ESRS 57, ESRS 58, ESRS 59, ESRS 60, ESRS 61, ESRS 62, ESRS 63, ESRS 64, ESRS 65, ESRS 66, ESRS 67, ESRS 68, ESRS 69, ESRS 70, ESRS 71, ESRS 72, ESRS 73, ESRS 74, ESRS 75, ESRS 76, ESRS 77, ESRS 78, ESRS 79, ESRS 80, ESRS 81, ESRS 82, ESRS 83, ESRS 84, ESRS 85, ESRS 86, ESRS 87, ESRS 88, ESRS 89, ESRS 90, ESRS 91, ESRS 92, ESRS 93, ESRS 94, ESRS 95, ESRS 96, ESRS 97, ESRS 98, ESRS 99, ESRS 100

Stakeholder engagement

Engagement with key stakeholders provides valuable insights into their perspectives, both from those who might be directly impacted by our activities and those who are users of the information that A.P. Møller - Maersk (Maersk) publishes.

Stakeholder engagement supports us in identifying existing or emerging impacts or risks as part of the double materiality assessment (DMA). Their insights provide valuable input to our ESG programmes, helping us to shape our strategy, targets and decisions towards delivering on ESG commitments and KPIs.

The table on the right shows seven prioritised stakeholder groups. Colleagues and teams across Maersk regularly engage with stakeholder groups through various channels, gathering valuable insights on topics that are important to them. Stakeholder engagement with key external stakeholders such as our workforce and value chain workers is anchored with the relevant business functions across Maersk, depending on the stakeholder group or topic. Labour-rights focused engagement is anchored with the Employee Relations and Labour Rights team headed by the Chief People Officer, whereas engagement related to safety is anchored with the Safety and Resilience team headed by the Chief Operating Officer. Management receives regular updates on topics raised by stakeholders and their perspectives. As an example, perspectives raised by e.g. investors and customers are presented to the Executive Leadership Team.

We proactively seek stakeholder opinions through, for example, annual employee and supplier surveys, and with customers through a voice-of-customer process and our annual Strategic Customer Council, as well as dialogues with civil society organisations and unions to gain insights on key industry risks and impacts to workers and communities.

Key external stakeholders and how we engage with them

| | Stakeholder expectations of Maersk | Key engagement channels | How stakeholder input is used |
|--|---|---|---|
| Employees, contingent workers and value chain workers | Meaningful work, fair treatment and wages, safe working conditions, a sense of belonging for all, and good development opportunities. | <ul style="list-style-type: none"> • Daily manager/colleague interactions • Engagement and inclusion surveys • Grievance mechanisms • Engagement with unions and interest groups • Supplier audits | Provide valuable input to ESG programmes and shape actions and improvement plans to address any issues. |
| Customers | Solutions that can ensure responsible business practices and lower supply chain emissions. | <ul style="list-style-type: none"> • Regular business interactions and ongoing supplier assessment • Strategic Customer Council and customer satisfaction surveys • Partnerships and collective action alliances | Informs product development and shapes solutions. Customer feedback on providing greater value is directly linked to our integrator strategy. |
| Authorities, regulators and standard setters | Compliance with regulation and industry leadership on the transformation to net-zero. | <ul style="list-style-type: none"> • Engagement with local, national and international agencies and authorities • Standard-setter collaboration on topic-specific research, pilots and implementations • Industry associations, collective action alliances and strategic partnerships | Ensure we adhere to regulations. Help us identify opportunities for collaboration and initiatives across the ESG agenda and to push for regulations towards industry-wide decarbonisation. |
| Suppliers and business partners | Fair and transparent business opportunities and partnerships on strategic issues. | <ul style="list-style-type: none"> • Contract management • Supplier relationship management framework • Supplier surveys, workshops and capability-building programmes • Industry forums and associations | Build understanding of the effectiveness of supplier practices and engagement. Enhance value chain visibility, including fair working conditions and supplier ethical business conduct. |
| Investors and analysts | Strategies, plans and actions to mitigate short and long-term risk to the business model. | <ul style="list-style-type: none"> • Regular engagement through e.g. earnings calls, conferences, events, roadshows and meetings, including the Annual General Meeting • Investor surveys and ESG ratings • Collective action alliances | Helps us understand how the company is perceived in comparison to other investment opportunities. ESG ratings additionally help identify gaps in ESG management and emerging trends. |
| Local communities and nature | Responsibility and accountability towards material issues in areas of highest impact. | <ul style="list-style-type: none"> • Environmental and Social Impact Assessments, Corporate Social Responsibility Initiatives • Engagement with community representatives and employees • Collective action alliances and partnerships • Scientific studies | Local communities help us better understand the needs and constraints of nature where we operate, informing decisions to invest and procure resources and to mitigate negative impacts in operations and the value chain. |
| Civil society organisations | Responsibility and accountability towards material issues and positive contributions in areas of highest impact and leverage. | <ul style="list-style-type: none"> • Bilateral engagement with local, national and international agencies • Collective action alliances | Access to valuable insights, expertise and best practices which help us identify potential risks or opportunities and shape ambitions and actions. |

A.P. Møller - Maersk
Annual Report 2024

A.P. Møller-Maersk describes the key stakeholders in a brief and relevant way. It is stated how the company engages with them and how this input is used to strengthen business relations and operations.

Guideline #8

Explain the due diligence processes related to ESG – and the outcome

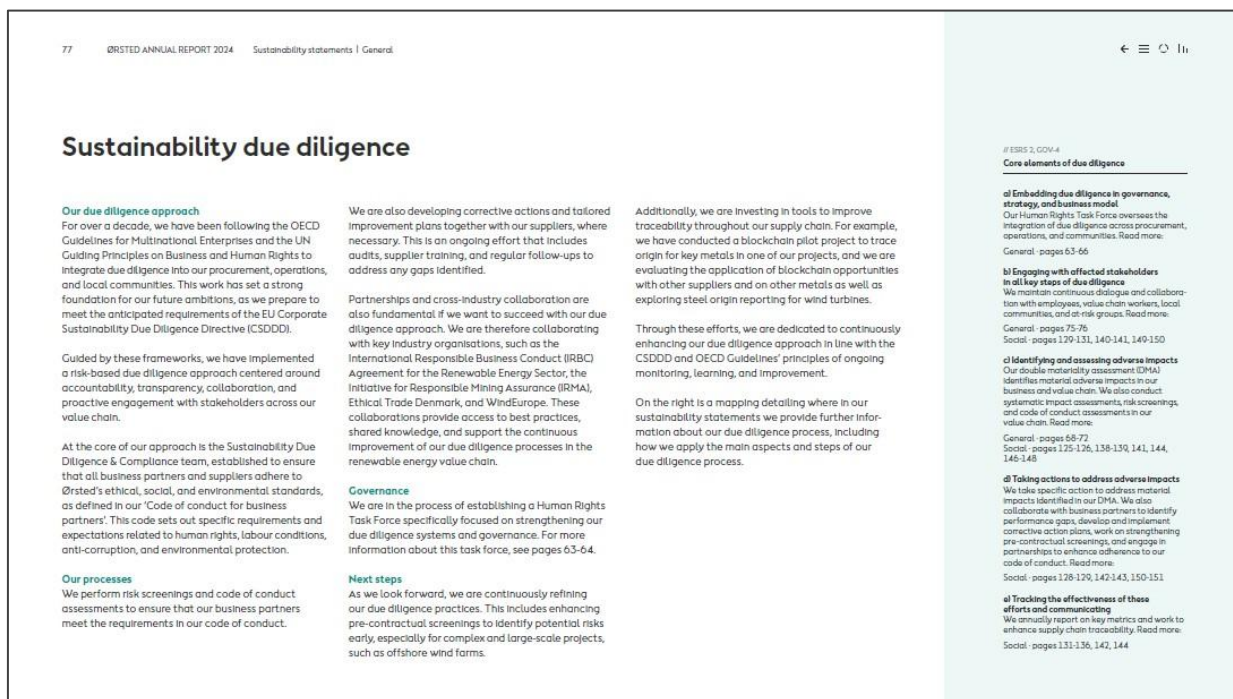
If you are to comply with CSRD, it is mandatory to describe the due diligence processes related to ESG – and with the Corporate Sustainability Due Diligence Directive (CSDDD) you must expect a more intensified focus on due diligence processes and topics from regulators, authorities, investors and customers.

Companies are increasingly aware of their position and responsibility in the supply chain. To manage your supply chain is not just about delivery safety, quality and costs, it is also about ensuring that your suppliers comply with national and international rules and standards for human rights, privacy, use of data, trade, anti-corruption, diversity and inclusion, labor rights and payment, etc.

More and more companies are therefore taking a systematic approach to describing how they manage suppliers, conduct due diligence processes, and make sure they do business with companies that live up to high standards, both operationally and in regard to ethics and responsibility.

However, companies need to go further by not only focusing on upstream and their own operations, but also on their downstream operations. Due diligence must cover the full value chain, and corporate reporting should also focus on how

companies' products and services are marketed, sold, used, thrown away or recycled.



Ørsted describes the due diligence processes related to sustainability. Also, there is reference to due diligence elements included in different parts of the report.

Guideline #9

Communicate the value of developing the working culture, employee engagement and DEI-programs

Describing initiatives and results in relation to working culture and employee engagement is an essential part of corporate reporting. Especially, the terms diversity, equity, and inclusion (DEI) have been hot topics in corporate reporting in recent years.

The description of results and measures on these terms includes a lot of variety from one company to the next. It is regulatory to describe gender diversity, but diversity includes much more and should also be reported in regard to e.g. nationality, educational background, job functions and possibilities for personal growth and development. Also, when it comes to inclusion companies could describe how they help people with disabilities or how they work with NGOs or local communities create meaningful jobs.

The role of culture, engagement and DEI should also be reported in relation to the strategies and actions focusing on recruitment, retention and other employer branding activities.

These topics should not be subject to pure storytelling. Companies should use relevant measurements to document their results – this could include surveys on engagement, loyalty, and leadership, measurements of participation in training and education, and calculations on employee growth, new hires, and retention rate. Just to mention a few ways to develop data-driven reporting on people and culture.

ANNUAL REPORT 2024 | SOCIAL • SUSTAINABILITY STATEMENTS 87

DIVERSITY, EQUITY AND INCLUSION

BUILDING A DIVERSE, EQUITABLE AND INCLUSIVE WORKPLACE

In 2024, we continued to advance our efforts to create a workplace that embraces diversity, prioritises equity and fosters inclusion. Through targeted initiatives, we progressed towards gender parity in our Leadership Team, ensuring equal pay and building a more inclusive future for all employees at Pandora.

Diversity, equity and inclusion have long been integral to our culture and operations, and we remain dedicated to embedding them across all parts of our organisation. We continue to build on our existing efforts to create an inclusive workplace that reflects the diversity of the more than 41,300 employees in our global workforce. Employees are well-distributed across male, female, other or not reported, with the highest number of employees located in Thailand and the United States.

The age profile is distributed with 48% below 30, 48% between 30 and 50, and 4% above 50 years, highlighting a multigenerational workforce committed to inclusivity and diversity.

TARGETS AND PROGRESS

FULL GENDER PARITY
Achieve full gender parity in the Leadership Team no later than 2030.

2024: 35% | 2030: 50%

INCLUSION SCORE OF 8.5
Maintain 8.5 score on inclusion in employee listening survey.

2024: 8.8 | Maintain 8.5 out of 10

● As of 2024 | ● Target

Pandora is communicating its targets, results and initiatives for diversity, equity and inclusion in a way that demonstrates commitment and progress.

Guideline #10

Connect UN's Sustainable Development Goals to the targets and initiatives within ESG









With a comprehensive framework of laws, directives and standards to guide corporate reporting, this discipline is to an increasing extent becoming somewhat complex and technical. E.g. understanding the implications of the sustainability statement is not an easy task to non-advanced readers.

Many companies have adopted UN's Sustainability Development Goals (SDGs) as a way to understand and direct actions to support specific goals and the Paris Agreement (2015). SDGs are important guidelines to nations, companies and people around the world and serve as a common language for sustainability. In this way, the SDGs are also relevant as a complementary framework to communicate the value of a company's sustainability strategy and its specific priorities in light of the SDG's.

The position and role of the SDGs in the annual report can take many forms. However, it is important that the use of the SDG's and the illustrative icons is not just graphic decoration of the report, but that the connection of SDGs to the strategy and operations is explained and documented. If you include SDGs in reporting, they must be expected to be a focus for discussion and prioritizations in top management.

Lundbeck Annual Report 2024 Management Review 2024 in brief Business and strategy Business performance Corporate governance Sustainability Financial Statements 63

Lundbeck's sustainability priorities and correlation with DMA¹

| Materiality aspects | Access to Health  | Business Ethics  | Climate Change & Circularity    | People & Communities    |
|--|--|--|--|---|
| How is this topic related to Lundbeck's business model and strategy? | Lundbeck's business model is to research, develop, produce, and market medicines for psychiatric and neurological diseases. Our long-term success depends on health parity, reduced stigma, and cultural acceptance of brain diseases. Pressure on healthcare systems could lead to reforms potentially impacting Lundbeck's business. | When Lundbeck maintains ethical business practices and respects rules and regulations, we protect patients, uphold stakeholder integrity, and minimize the risk of financial repercussions. Ethical conduct to avoid potential negative impacts throughout in our value chain is vital for our license to operate, especially in relationships with healthcare professionals, patients, and other stakeholders. | Lundbeck's business model impacts the environment negatively through greenhouse gas emissions from energy use, transportation, and supply chain activities, as well as waste generation contributing to climate change and potential pollution. If we minimize our impact on the environment in the entire value chain, we mitigate the risk of restrictions or disruptions to our production and supply to the benefit of our patients. | Our business model relies on attracting and retaining a skilled and diverse workforce. When Lundbeck is successful in maintaining a safe, inclusive culture, free of harassment and discrimination, it helps us remain a preferred employer and attract the best and most dedicated scientists and other staff, enabling us to develop innovative treatments for patients. |
| What topics does Lundbeck hold responsibility for managing actual and potential impacts on people and the environment based on the DMA?² | <ul style="list-style-type: none"> + Innovation in treatment + Patient voice - Inequality in access to health - Product safety and quality - Responsible and ethical marketing | <ul style="list-style-type: none"> - Business ethics - Responsible sourcing - Animal welfare | <ul style="list-style-type: none"> - GHG emissions leading to climate change - Air pollution - Soil pollution - PFAS soil pollution - Water pollution from pharmaceutical residues - Waste and resource use | <ul style="list-style-type: none"> - Diversity, Equity, and Inclusion (DE&I) - Health and Safety, Mental wellbeing - Human rights and health and safety in the value chain |
| What are the financial risks or opportunities for our business based on the DMA?² | <ul style="list-style-type: none"> - Risk of pricing, reimbursement, and access - Risk of failure of pharmacovigilance | <ul style="list-style-type: none"> - Business ethics and Code of Conduct breach | <ul style="list-style-type: none"> - Damage to facilities from wild weather events - Increasing raw material costs | <ul style="list-style-type: none"> - Inability to attract and retain employees |
| Lundbeck's aspirations for 2030 | <ul style="list-style-type: none"> • Leverage our specialist knowledge to address the burden of brain diseases and make medicines available. • Promote accessibility of our medicines by addressing discriminatory, physical, economic, and informational barriers. • Improve mental health parity, reduce stigma, support national suicide prevention efforts, and enhance cultural acceptability of brain diseases. • Provide medicines of good quality, preserve patient safety, and combat counterfeit medicine. | <ul style="list-style-type: none"> • Promote business ethics, including human and labor rights through strengthened collaboration with key business partners. • Demonstrate that the Code of Conduct compliance program and organization work sustain an ethical culture and prevent any form of corruption. • Protect the integrity of the healthcare professionals we work with and use transparency as an asset. | <ul style="list-style-type: none"> • Deliver on the "Business Ambition for 1.5° C" pledge. • Transition electricity supply to renewable sources. • Manage two-thirds of value chain carbon emissions equally as effectively as carbon emissions from operations. • Minimize key business partners' carbon emissions related in relevant agreements. • Establish manufacturing processes based on circular economy principles to limit materials use, waste, and CO₂ emissions. • Expand application of circular economy principles to key partners. • Use detailed knowledge about active pharmaceutical ingredients to minimize their environmental impact. | <ul style="list-style-type: none"> • Be recognized as a workplace that fosters physical and mental wellbeing. • Show leadership to promote mental health with preventive actions at our workplaces globally. • Achieve a lost time accident frequency ≤ 3. • Be recognized by employees and externally as a workplace with an inclusive culture that offers equal opportunities for all. • Influence the public debate on equality and inclusion by setting ambitious targets, enhancing data transparency, and communicating actively. • Request key business partners to promote diversity and prevent discrimination in all its forms. |

¹ For further details on the Double Materiality Assessment (DMA) see pages 64-77. 2 (+) Potential/actual positive impact / financial opportunity. (-) Potential/actual negative impact / financial risk.

Lundbeck is integrating the UN SDGs into the annual report illustrating how this correlates with the company's priorities and the DMA.

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More info

Get the full report "Guide 2025 – Corporate Reporting" from www.corporaterelations.dk/annualreport