

# Norlys Sustainability Report 2025

**NORLYS**



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Number of fibre addresses

**910,000**



Employees\*\*

**4,650**



Public charging points\*

**9,419**



Investments in 2025

**DKK 4.4** billion



The mobile network was expanded with

**170** new sites

Norlys is Denmark's largest integrated energy and telecommunications group. We are owned by our 805,000 members and supply energy, EV charging stations, internet, TV and mobile services to more than 3.5 million households and businesses.

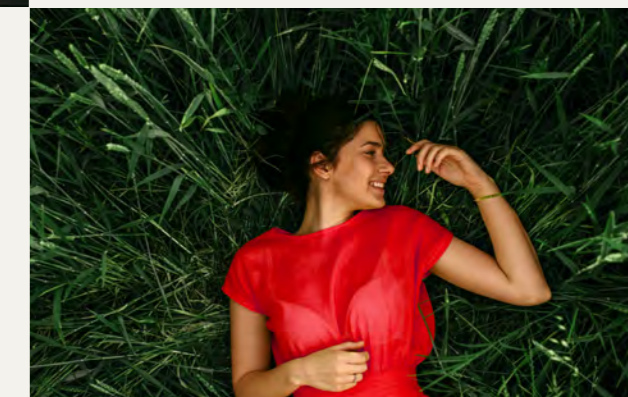
Customer relationships

**3,500,000**



Electricity grid reliability

**99.997%**



We own the country's largest electricity grid and fibre network, half of the country's largest mobile network, and we have Denmark's second largest public EV charging network. In addition, we own a majority stake in Norlys Energy Trading and the green and circular industrial park Greenlab, and half of Eurowind Energy, a leading developer of solar and wind farms.

Members on the Board of Representatives

**662\***



Members

**805,000\***

Our 4,650 employees in Silkeborg, Aarhus, Aalborg, Esbjerg, Sønderborg and Copenhagen work for a sustainable and digital Denmark.

\*By the end of 2025  
\*\*Number of employees is based on headcount by the end of 2025

# Group structure

## Core business

Ownership interest	Companies	Activity
100%	<b>Kundeselskabet Norlys</b> Norlys Digital A/S Norlys Mobil Danmark A/S Norlys Energi A/S Norlys Charging ApS Kundeselskabet Norlys A/S	Operates Norlys' customer-facing activities with a wide range of offerings within internet, TV, mobile, electricity and charging solutions
65%	<b>Sinal</b> Norlys Infrastructure Holding A/S Sinal Infrastruktur A/S Sinal A/S	Operates and develops Denmark's largest fibre network where customers are free to choose between a large number of commercial providers
100%	<b>Elnetselskabet N1</b>	Operates and develops Denmark's geographically largest electricity grid, enabling a future with more renewable energy

## NORLYS a.m.b.a.

Norlys' 805,000 members

## Norlys Group A/S

Active owner of Norlys' entire portfolio of companies

## Other wholly and partly owned companies

Ownership interest	Companies	Activity
100%	<b>OpenNet</b>	Collaboration platform for providers of fibre network
100%	<b>Karlsgårde Vandkraft</b>	Former hydroelectric power plant
99.9%	<b>Tangeværket</b> Gudenaacentralen	Hydroelectric power plant
97.7%	<b>Mjolner</b> INFORMATICS	Software, data, innovation and digitalisation
79.12%	<b>GreenLab</b>	Green and circular industrial park
52.81%	<b>NORLYS ENERGY TRADING</b>	Risk management, electricity and gas balancing and trading

No operational control

50%	<b>TM Network</b>	Mobile infrastructure
49.8%	<b>Eurowind Energy</b>	Develops, builds and operates renewable energy farms

2025 was a year in which energy and security moved right into the centre of the global agenda. A continued turbulent geopolitical landscape, climate change, threats to critical infrastructure and rapid technological changes sharpened the focus on energy independence, security of supply and resilience.

As Denmark's largest integrated energy and telecommunications group – and as a cooperative – Norlys has a special responsibility to act for the common good. We must think long-term, invest wisely and contribute to solutions that strengthen Denmark's security, independence and green transition.

#### **Electrification for the benefit of all of Denmark**

The electrification of society has been accelerating over the past decade. Electricity from renewable energy sources will replace fossil fuels in homes, transport and industry. This strengthens the green transition, security of supply and our independence from imported energy.

But electrification also brings new demands. The electricity system must be able to handle more production from solar and wind, more electric cars, heat pumps and increasing electricity consumption – while both physical and digital threats place higher demands on robustness and preparedness.

Therefore, in 2025, Elnetselskabet N1 continued its focus on future-proofing and expanding the electricity grid. A strong, flexible and resilient electricity grid is a prerequisite for both security of supply and a rapid green transition.

Electrification has also gained ground in the transport industry. During the year, we expanded our nationwide

EV charging network with more than 2,700 new public charging points and opened six new charging hubs for passenger cars. In heavy goods transport too, the development has been rapid with the opening of five charging hubs for heavy goods transport. At the same time, we have almost finished electrifying Norlys' own passenger car fleet and are busy changing our technicians' cars to electric by 2030.

#### **Part of the gold standard for climate targets**

At Norlys, we are ambitious with our climate targets. We are committed to reducing our carbon footprint in our own operations and throughout the value chain. The ambitious approach is also reflected in a well-established ESG governance structure, where governance and ownership are clearly anchored with firm reporting and decision-making processes that ensure systematic follow-up on risks, targets and initiatives across the Norlys Group.

It was therefore with pride that Norlys became one of the first 2,000 companies worldwide to have their net zero climate targets validated by the Science Based Targets initiative (SBTi) in 2025. The validation and approval by SBTi of Norlys' climate targets means that both our near-term and net-zero targets comply with the latest climate science and are in line with the 1.5°C target from the Paris Agreement. Reaching net zero is a complex and long-term task that requires significant changes in our own operations as well as the value chain, and in 2025 the first key initiatives started to be implemented.

#### **A well-balanced working life**

In 2025, the flexibility agenda also gained momentum. We find that more Danes are looking for workplaces

that have room for both work and personal life. Among other things, we went up nine places in Universum's survey on attractive workplaces, ending up in 14th place among the most attractive workplaces in Denmark. For us, this is a sign that our consistent work to create a strong culture with good conditions for our employees makes room for a diverse workforce with different life situations and needs. During the year, there was still a lot of interest in data and experience from our scheme around unlimited child sick days. In 2025, we also partnered with Interforce, which means that we now offer increased flexibility to Norlys employees in the Danish Reserve Force.

#### **Cooperative democracy is at the core of Norlys**

As a Danish cooperative, Norlys is firmly rooted in the communities where our owners live. We have a responsibility to create long-term value for our members, customers and the society around us. This means that we think beyond short-term financial results and work for solutions that also benefit future generations. For the same reason, during the year, we discussed Norlys' strategy and targets with the Board of Directors and Board of Representatives at dialogue meetings around Denmark, and a targeted initiative to raise awareness among our 805,000 members about their role as co-owners of Norlys.

In this report, we provide an insight into the progress we have made in Environment (E), Social (S) and Governance (G).

Gert Vinther Jørgensen  
Group CEO in Norlys



# General information

# General basis for preparation of sustainability statement

## BP-1

In 2024, Norlys introduced its first sustainability statement inspired by the requirements of the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). Even though Norlys will not be subject to the statutory requirements in CSRD until 2027, we have decided to continue with CSRD-inspired reporting. This ensures that we create a solid foundation and continuous improvements towards 2027 with a view to achieving limited assurance and an audited statement.

Sustainability (ESG) is not just a requirement imposed from the outside, but a strategic investment, and we are committed to integrating ESG into the entire business. Our ambition to run a responsible business remains high, and in this year's sustainability statement, we focus strongly on the areas and data points that create the most value. The CSRD serves as a framework for the internal transformation and ensures that we create business value for our stakeholders.

Norlys is committed to international initiatives and certifications, including the UN Global Compact, EcoVadis, Science Based Target initiative (SBTi) and Technology Sustainability index (TSi) as well as the Global Real Estate Sustainability Benchmark (GRESB), which supports the quality of our processes and business practices. We are committed to ensuring development and creating transparency in our work with ESG.

In last year's sustainability statement, 2024 was established as the base year, which makes it possible to compare data and document the development in this report.

### Scope and consolidation of reporting

Unless otherwise stated, all data and information in this sustainability statement have been prepared based on

consolidated data from the Group, Norlys a.m.b.a. (Norlys), as well as companies controlled by Norlys, including both Norlys Group and core companies (the core business) as well as other majority-owned subsidiaries (other subsidiaries), see the Group structure. Data has been collected and consolidated for each legal entity based on Norlys' accounting policies and follows the same consolidation and period as in the financial statement. This report reflects policies, actions and targets at group level and, where applicable, at company level.

The sustainability statement covers both Norlys' upstream and downstream activities in the value chain as well as its own operations, and significant areas are identified to the extent deemed relevant, cf. [the double materiality assessment](#).

Norlys follows the time horizons in ESRS 1 and does not make use of the option of omitting classified and sensitive information.

The reporting follows the financial year, from 1 January to 31 December, and all significant events and data for the period are included until the approval of the sustainability report. Other events that occur afterwards will generally be included in the next reporting period.

### Sources of uncertainty

Norlys strives to provide accurate and relevant information that reflects the impacts of the entire group's activities. To minimise significant errors, additional internal controls and validation processes have been established and improved since last year. There may still be errors and deficiencies in the calculation of quantitative data due to general uncertainties, and Norlys uses estimates and assumptions where relevant.

In general, the GHG Protocol's instructions are used in connection with carbon accounting. There is still uncertainty associated with spend-based calculations and secondary data in Scope 3. The uncertainty is reduced through continuous improvements in methods, generally increased data quality and an ongoing implementation of ESG software.

Risks in the reporting are regularly assessed with a focus on significant deviations, external sources and data as well as in dialogue with internal specialists. In 2025, data underwent a strengthened process in collaboration with an external auditor, enabling risk management and controls to be included as an integral part of the quality assurance.

Accounting policies and methods are described under the respective topics.

### Changes to the report

Data quality has improved since last year, but we continue to gain experience and optimise processes to strengthen data quality, precision and completeness. This has resulted in revisions to 2024 data, including recalculations and method changes. See more on this under the respective sections.

In 2024, Norlys took over Telia Mobil Danmark, which was therefore stated separately in the 2024 sustainability statement. Norlys Mobile (formerly Telia Mobil Danmark) is no longer listed separately in 2025 but is integrated into Norlys as part of Kundeselskabet Norlys A/S (hereinafter "Kundeselskabet").

None of the above changes have had an impact on the ability to compare data or monitor progress in the results for the targets we have set in Norlys.

# The role of administrative, management and supervisory bodies in sustainability

## GOV-1

### Sustainability competences

Norlys has a dedicated ESG team that ensures compliance with applicable requirements and expectations. In addition, ESG specialists are employed at Elnetselskabet N1, Sinal and Kundeselskabet, with responsibility for ESG change management and implementation as well as ESG data management, respectively. Competence building takes place both centrally in the Group and decentrally in the companies.

The Board of Directors of Norlys a.m.b.a. is democratically elected by and among the members, and the Board of Directors also consists of employee-elected representatives. Therefore, the Board of Directors has a special focus on securing and developing their competences in strategic and financial management as well as in security and sustainability. The Board of Directors' Governance and Competence Committee evaluates the competence level annually and prepares a development plan. All members complete a board education at Aarhus University.

In addition, the individual companies have independent Boards of Directors consisting of:

- members from the Norlys a.m.b.a. Board of Directors
- members from the Norlys Group
- members from PGGM and EDF (in Sinal)
- independent external members with relevant competences

External members are recruited based on an ongoing identification of the competences needed. The competence need is approved by the Board of Directors of Norlys a.m.b.a.

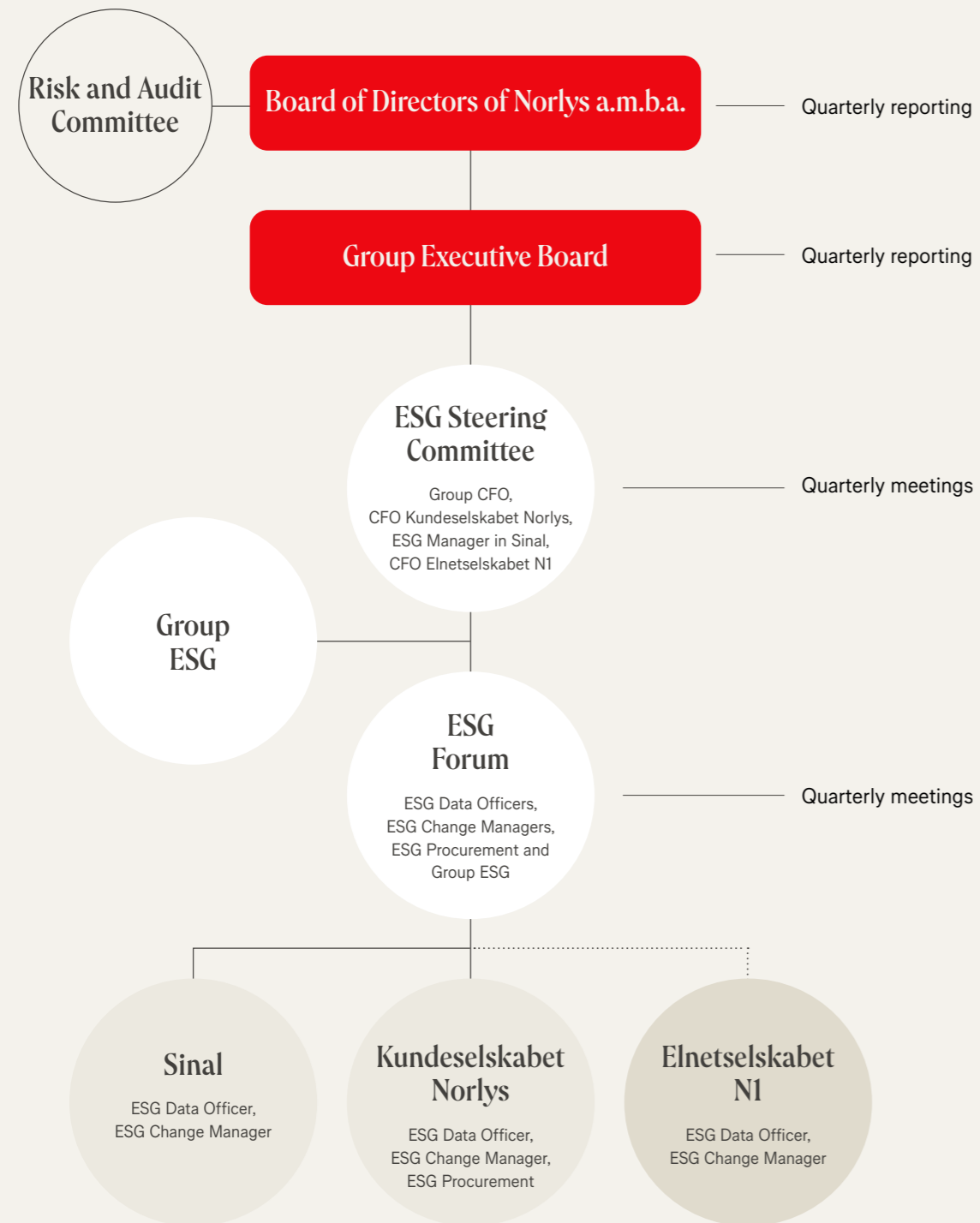
The Board of Directors and the Executive Board have direct access to expertise on material impacts, risks and opportunities associated with specific parts of the business. This knowledge is rooted in relevant business areas.

The a.m.b.a. Board of Directors Representation of employees and other workers	Executive Board Number of executive and non-executive members
Four members of the Board of Directors of Norlys a.m.b.a. are elected by the employees.	The Executive Board consists of two members (executive) who have eight members in direct reference (non-executive).
Percentage by gender and other aspects of diversity that the business considers	
At the end of 2025, the Board of Directors of Norlys a.m.b.a. consists of four women (21%) and 15 men (79%).	Group Management consists of one woman (50%) and one man (50%).  The senior management team consists of two women (67%) and one man (33%).
Percentage of independent board members	
The Board of Directors consists of 19 members. 11 out of 15 board members elected by the Board of Representatives are independent, which is equivalent to 57% independent members for the entire Board of Directors. Four members are employee-elected.	

*Four board members have been members of the board for more than 12 years and are therefore assessed to be dependent. The four employee-elected board members are, by definition, considered dependent.*

*Published as breakdown at year-end, cf. accounting policies used for data related to Social (S).*

## ESG Governance



### ESG Governance

Norlys has established an ESG organisation which consists of an ESG Group function, an ESG Forum and an ESG Steering Committee. The ESG Steering Committee has the mandate to make management decisions within the field of ESG to ensure that we can act with due diligence. If a matter cannot be resolved within this organisation, a decision can be made via other established channels, such as the Executive Board or the Board of Directors of Norlys a.m.b.a. However, this mandate takes into account the functional separation of Elnetselskabet N1 from the rest of the Group.

### Board and Committees

ESG is anchored in the Board of Directors and is integrated into the Risk and Audit Committee, which is a committee of the Norlys a.m.b.a. Board of Directors, and Audit Risk Committees, which are committees of the Boards of Directors of Elnetselskabet N1, Sinal and Kundeselskabet.

### Group Executive Board

The Executive Board is responsible for the day-to-day management and is therefore also responsible for Norlys' ESG efforts and ESG strategy.

### ESG Steering Committee

The Steering Committee monitors progress across the companies and addresses the demands and expectations of society and customers. From its establishment in 2022 up to and including 2025, the Steering Committee met quarterly. As ESG governance in Norlys is now well established, it will be convened from 2026 as needed. The ESG Steering Committee consists of the Group CFO and ESG owners of Elnetselskabet N1 (CFO), Sinal (Head of Strategy and Transformation) and Kundeselskabet (CFO). Group ESG acts as the secretariat for the ESG Steering Committee.

### ESG Forum

The ESG Forum consists of representatives from the Norlys Group and each of the core companies. The ESG Forum meets quarterly. Each core company appoints

two representatives to the ESG Forum: An ESG Data Officer and an ESG Change Manager. ESG specialists from Procurement in Kundeselskabet are also part of the ESG Forum. The ESG Forum ensures progress on CSRD compliance and Norlys' ESG targets across the organisation. If dilemmas of a strategic nature arise, the ESG Forum passes them on to the ESG Steering Committee.

### Group ESG

The work with ESG at Norlys is anchored in the Norlys Group. Group ESG is responsible for driving the Group's ESG strategy, ensuring CSRD-compliance, monitoring progress, prioritising activities, coordinating and reporting at group level.

### How the management and board address sustainability matters

The Executive Board and the Board of Directors of Norlys a.m.b.a. receive quarterly status reports on Norlys' work with ESG. The ESG reporting contains a description of progress on the work with ESG, including projects that

contribute to mitigating material risks and impacts. Progress and challenges are discussed at the time of the status reporting, and a plan for the next quarter is presented. ESG reporting is carried out and coordinated by Group ESG. The results of the double materiality assessment are reviewed once a year in the Risk and Audit Committee and the Board of Directors of Norlys a.m.b.a. Several impacts, risks and opportunities are business critical and are therefore regularly discussed by management in the Group and the companies. As of 2025, ESG will also be addressed in the Audit and Risk Committees of the core companies.

ESG impacts, risks and opportunities are thus discussed across the organisation, and trade-offs take place continuously. In particular, the actions needed to reduce carbon emissions require changed processes and perspectives on both major transactions and risks.

In 2026, work will continue to integrate the Group's material impacts, risks and opportunities into the Group's and the relevant companies' general risk management.

### The Risk and Audit Committee

The Risk and Audit Committee ensures ongoing control of ESG risks, impacts and opportunities.

#### The Committee performs tasks including the following:

- Discussing the annual report including the sustainability report and related reporting from the auditor prior to review by the Board of Directors.
- Ensuring that the Norlys Group's work with ESG complies with applicable legislation and that the requirements are integrated into the ESG strategy.
- Discussing the ESG strategy.
- Discussing the double materiality analysis and derived IROs (Impact, Risk, Opportunity) and ensuring that non-financial controls are adequate and that the work with ESG generates a valid data basis.
- Ensuring that a risk policy and a risk picture are developed for the company's overall risks, including a framework for risk management and risk tolerance in Norlys.

### Standard terms of reference for Audit Risk Committee (ARC)

The purpose of the Committee is to prepare the Board of Directors' assessment of matters pertaining to risks, auditing and accounting, including ESG, cyber and information security and financial reporting, and reporting by the auditor(s) in relation to the Board of Directors' annual cycle of work.

#### The Committee performs tasks including the following:

- Ensuring that the work with ESG in the companies meets the requirements defined by Norlys Group and follows the governance established for this.

# ESG-related incentive structure

## GOV-2

At Norlys, all employees are covered by bonus programmes, where both financial and non-financial targets are set as part of safeguarding community, value creation in the companies and responsible business conduct.

Although bonus targets are not directly linked to ESG-related topics for all employees, job satisfaction is integrated as a target for managers in the core business. The goal for job satisfaction is short-term, but is included annually as a fixed KPI in the incentive scheme to create a positive impact on our own workforce. This is an important criterion and thus constitutes 20% of the managers' bonus programme.

The incentive scheme reflects our focus on running a responsible business where the well-being of all employees is crucial.



# Statement on due diligence

## GOV-3

We are continuously developing and improving our due diligence processes in Norlys. This also applies to sustainability, where processes are broadly integrated into our business activities. The due diligence process increases the knowledge base and makes it possible to prioritise efforts and initiatives, focusing in particular on the potential and actual negative impacts we as a company can have on both people and the environment. We are committed to taking action and eliminating adverse impacts and risks where possible. It is therefore also a

continuous practice that both reflects and can affect Norlys' own operations, value chain and strategic basis both now and in the future.

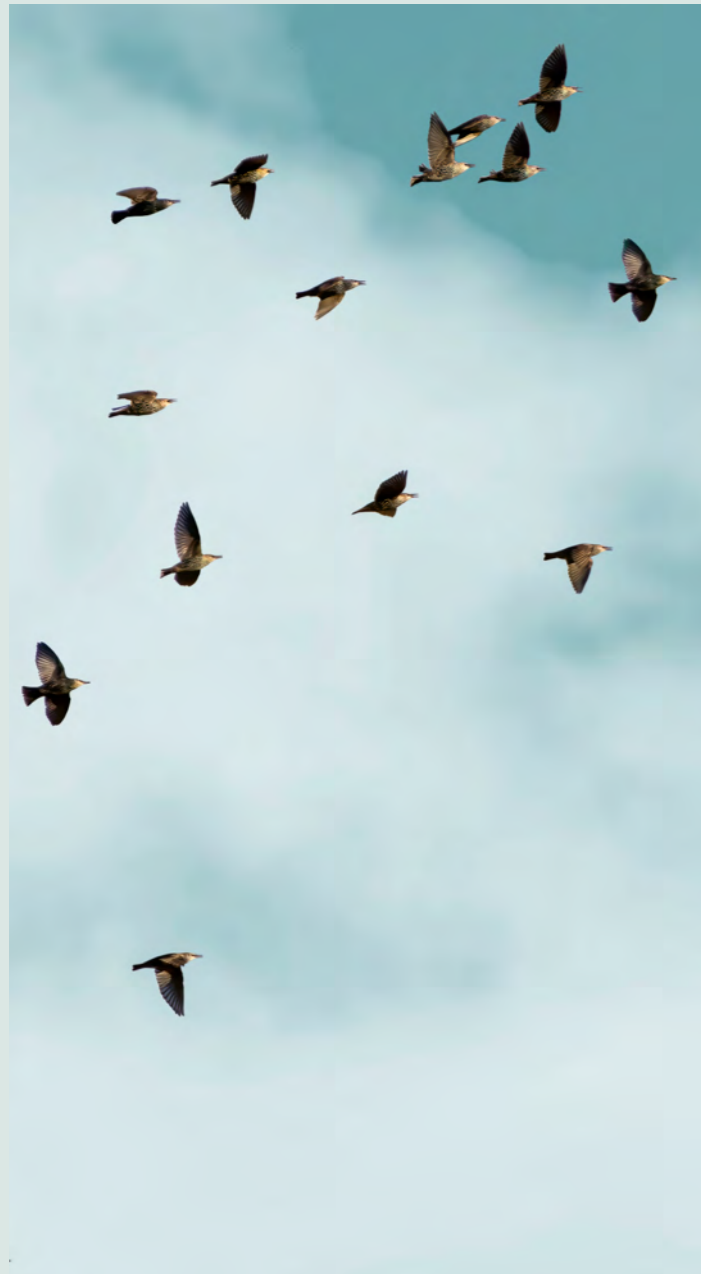
Based on the Group structure, the work with due diligence, risks and initiatives in Norlys is anchored in the respective companies, business areas and specialised teams. At the same time, we strive for close cooperation across the Group, enabling targeted and cross-organisational efforts in the areas where we can actually make a difference.

Core elements of due diligence	Section of the sustainability statement	Page
Embedding due diligence in governance, strategy and business model	GOV-1; GOV-3 SBM-3 IRO-1	8; 10 16 17
Cooperating with affected stakeholders	SBM-2	15
Identifying and assessing adverse impacts on people and the environment	IRO-1	17
Taking actions to address negative impacts on people and the environment	E1-4; E1-1 & E1-5 S1-1; S1-2; S1-3 S4-1; S4-2; S4-3 G1-1; G1-2	22; 25-31 39, 42, 47-48; 50-51; 40, 43, 48 55; 57; 56 61, 64; 61, 63
Tracking the effectiveness of these efforts	E1-6; E1-7; E1-8 S1-2; S1-4; S1-4 & S1-8 S1-11; S1-15; S1-16 S1-5 S1-13 S4-2; S4-4 G1-2; G1-3; G1-4	23; 32; 33-35 50-51; 41; 41, 44, 49 45; 45; 46 53 49 57; 58 62; 63; 62

This table provides an overview of where key ESG topics are reflected in Norlys' due diligence process in the report.

**Due diligence process**

At Norlys, due diligence generally follows the same step-by-step process for all sustainability topics. The process supports implementation efforts going forward, primarily through risk management.



2

**Risk assessment**

Risk assessment and mapping of the value chain as well as assessment and prioritisation of risks in relation to people, the environment and society through, among other things:

- The double materiality assessment, where the largest and most significant risks are identified for the entire value chain.
- ESG risk management that helps support implementation efforts going forward.

6

**Recovery**

We will arrange for recovery and remediation where we have contributed to any harm to people, the environment and society, including:

- Complaint mechanisms which we ensure that everyone can access. Read more about this under Governance .

5

**Communication**

Open and transparent communication about our work and how we identify and manage significant risks:

- This is primarily stated in the annual sustainability statement and on Norlys' website and in the policies.
- Ongoing dialogue with stakeholders.

3

**Management**

Management of identified risks through action plans that help structure our work on the negative impacts, where there is a special focus on prioritising:

- Measures against negative impacts.
- Preventive and mitigating measures.

1

**Commitments**

Commitments through policies, contracts, risk management and other principles that guide our work. This includes, among others:

- Continuously policy updates, e.g. Supplier Code of Conduct.
- Supportive processes, cf. [risk management](#).

4

**Ongoing follow-up**

Follow-up on risks and how they are managed:

- Progress is documented.
- There is quarterly reporting across ESG categories.

# Risk management and internal controls of sustainability statement

## GOV-4

The preparation of Norlys' sustainability report is anchored in a dedicated ESG team in the Norlys Group that coordinates the reporting process across the Group. The collection and processing of data take place in close cooperation with ESG Change Managers and ESG Data Officers in each core company in accordance with the governance model described in [GOV-1](#).

These functions are a central part of the control environment for sustainability reporting and ensure clear responsibilities, segregation of duties and ownership of data quality.

### Continuous risk management format

Risk management in the core companies is anchored in their Audit and Risk Committees as well as Boards of Directors. At Group level, the work is organised under the Risk and Audit Committee and Norlys a.m.b.a.'s Board of Directors. ESG-related risks – including reduction of climate emissions, materiality, risks and opportunities identified through double materiality assessment – as well as associated actions are integrated into the Group's overall risk management framework.

Additional control activities:

- ESG Steering Committee meetings attended by core companies and Group ensure ongoing monitoring and escalation of risk factors.
- Cross-organisational ESG working groups support coordination and prompt mitigation of identified risks.
- Quarterly reporting of significant key figures from core companies to the Executive Board, the Board

of Directors of Norlys a.m.b.a. and the ESG Steering Committee.

These structures ensure a systematic process for identifying, assessing and monitoring risks relevant to sustainability reporting.

### Securing credible data

To ensure completeness, validity and accuracy in sustainability data, Norlys uses a process system for documented process diagrams and descriptions, supported by accounting and data manuals.

Control activities:

- Iterative validation processes ensure data integrity and consistency.
- Quarterly reporting of material key figures from core companies to the Board of Directors and the ESG Steering Committee enables control of completeness.
- A continuous test of all quantitative data is carried out for Q1-Q3 before final consolidation.

Monitoring and documentation:

- We are working on documenting data sources with notes on uncertainties and deficiencies, methodologies and estimates.
- Estimates and methods follow recognised standards and are prepared from collaboration with external consultants and auditors.

This ensures effective management of risks related to data completeness, integrity and accuracy.

# Strategy, business model and value chain

## SBM-1

<b>DNA</b> Where do we come from?	We were established as a cooperative
<b>Belief</b> What do we believe in?	Acting responsibly, and beyond our own interests
<b>Mission</b> What are we fighting for?	Driving positive change through our community
<b>Vision</b> What is our role in the world?	The responsible innovator
<b>Values</b> What guides our behaviour?	Community · Responsibility · Innovation

At Norlys, we aim to take responsibility for more than just ourselves. We have a special responsibility for developing the ownership regions and the local community, and we take responsibility for developing and rethinking what a greener and more digital Denmark looks like as we work to future-proof Denmark's infrastructure in telecommunications and energy. This ambition is enshrined in Norlys' ownership strategy, which is a long-term strategy for the Group's activities, and which sets the framework for other strategies. The ownership strategy defines Norlys' enduring purpose and our values in a set of core principles which form the foundation for our management of the Group.

The ownership strategy also defines a number of financial and non-financial objectives. Among the non-financial objectives are:

- Net zero climate neutrality for Scope 1 and 2 by 2030
- Employee satisfaction of >78 out of 100

Thus, ESG has a significant strategic importance. To meet the ownership strategy's goal of contributing to a greener Denmark, it was a natural step to add science-based climate targets verified by the Science Based Targets initiative (SBTi) and in accordance with the Paris Agreement. This includes a climate target for the value chain to become climate neutral by 2040, based on overall carbon accounting.

### Business model and value chain

Norlys operates in the energy and telecommunications sectors. In both sectors, we have both infrastructure and a customer-facing business. Our infrastructure covers electricity grids, fibre networks, heavy and light public and private charging infrastructure, coax and mobile infrastructure. Our customer-facing businesses cover sales of energy, EV charging stations, internet, TV and mobile services to private and business customers throughout Denmark. In addition, we operate in the energy sector through Norlys Energy Trading, of which we own a majority

stake, as well as the green and circular industrial park Greenlab Skive ('GreenLab'). Norlys also owns just under half of Eurowind Energy, a leading Northern European developer of solar parks and wind farms. For the latter, the Group does not have operational control. With OpenNet, we provide a collaborative model and an IT platform for opening of fibre networks, making it easier for service providers and network owners to work together. Norlys' actions in the energy and telecommunications sectors are directly linked to significant climate and environmental impacts, including greenhouse gas emissions from power grid losses, as well as social and governance-related risks such as cyber security and security of supply. Therefore, the Group's activities are closely linked to the material matters identified in the double materiality assessment in [SBM-3](#).

Thus, Norlys' business model combines ownership of critical infrastructure with a customer-facing business, in which the Group is primarily positioned in downstream activities in the value chain as a network operator and service provider, but with strategic partnerships in upstream activities through energy production and digitalisation. There is a functional separation between the commercial business and Elnetselskabet N1 to ensure independence in operation. Upstream activities involve suppliers of energy, cables, transformers and construction work, while downstream activities cover the use of sold products such as routers, fibre boxes (ONT) and end-user charging boxes. This position entails significant climate risks, but also opportunities to mobilise the green transition through electrification and digitalisation, which is central to Norlys' strategic objectives.

Activities in special business areas (DKK million)	2025	2024
Natural gas sales	887.2	869.5

Norlys has no activities in chemical manufacturing, weapons, tobacco cultivation and production, or coal and oil production.

Our strong cooperative democracy and ownership model allow us to make long-term investments in the infrastructure and to meet significant ESG impacts, risks and opportunities. This is described in more detail in the respective sections of the report. See [SBM-3](#) for an overview.

In 2025, Norlys strengthened its position as an integrated energy and telecommunications group by expanding capacity in fibre networks and mobile networks, as well as accelerating the roll-out of charging infrastructure for electric cars and heavy goods transport. In addition, there has been significant development in digital customer solutions that improve the customer experience and support a more data-driven business. There is a greater focus on the business segment through new digital services and solutions within renewable energy, which contributes to the Group's strategic goal of promoting the green transition and digitalisation in Denmark.

### Resources

Norlys' energy business sells natural gas to residential and business customers. The number of gas customers is continuously declining due to the electrification of Denmark and the roll-out of district heating. This development is in line with the Group's strategic goal of green transition, including phasing out natural gas in household heating in accordance with national climate targets and Norlys' ambition of climate neutrality by 2040 for the entire value chain (Scope 1, 2 and 3).



### Accounting policies

The figure includes direct sales of physical gas. It deviates from the figures in the annual report, as these include the effect of a successful arbitration case as well as revenue from service schemes. Revenue from Norlys Energy Trading has not been included as it relates to derivatives and capacity agreements – not physical gas.

## Energy

We invest in activities within solar, **wind**, **battery solutions** and **Power-to-X**.



Norlys' grid company future-proofs and operates **Denmark's largest electricity grid**. We are developing a nationwide EV charging network. We balance supply and demand.



**We sell electricity, gas and charging solutions** for light and heavy goods transport to businesses, private and public customers.



Norlys' business model combines our role as Denmark's largest energy and telecommunications group with our cooperative DNA. Our goal is to create the greatest possible value for our members, customers, employees and society as a whole.

We work across the energy and telecommunications value chain – from developing and operating critical infrastructure to delivering solutions that connect people, businesses and communities.

# We connect Denmark with energy, TV, EV charging solutions, mobile and internet.

## Telecommunications

We invest long-term in critical infrastructure and create value for our members and for society – enabled by our cooperative ownership model. With more than 4,650 employees, we work to develop and connect Denmark with energy and telecommunications solutions.



We develop, future-proof and operate telecommunications infrastructure through our ownership of the **largest fibre network in Denmark** and **co-ownership of the country's largest mobile network**.

We support **free competition in the fibre market** through a collaboration platform for network owners and service providers for the benefit of consumers.



We deliver **mobile telephony, internet and TV solutions** as well as **Internet of Things at competitive prices** to businesses, private and public customers.











# Interests and views of stakeholders

## SBM-2

At Norlys, dialogue with stakeholders is a cornerstone of our business model as a cooperative. We prioritise it as it gives us insight to develop strategies, objectives and practices – and because we want to create the greatest possible value for members, customers and society. The dialogue makes us wiser about expectations for the green transition, social responsibility, digitalisation and responsible operations, and ensures that these perspectives are reflected in Norlys’ strategic direction. Below is an overview of key stakeholders from across the value chain. The table shows the purpose of the engagement, how the dialogue takes place and how input affects our strategy and business model.



Key stakeholders	Purpose of engagement and stakeholder views	Dialogue and input from stakeholders	Influence on strategy and business model
 <b>Members</b>	<ul style="list-style-type: none"> <li>• Want to ensure that Norlys is managed responsibly in terms of the geography of the owners.</li> <li>• Are interested in Norlys being operated with a long-term strategic perspective and focusing on the green transition.</li> <li>• Norlys wants to be visible and understand how we best meet the wishes of our members.</li> </ul>	<ul style="list-style-type: none"> <li>• Norlys may only communicate directly with members in connection with election to the Board of Representatives, which happens every four years.</li> </ul>	<ul style="list-style-type: none"> <li>• Significant impact on Norlys’ overall strategic direction through dialogue at Board of Representatives meetings and selection of representatives.</li> <li>• Impacts Norlys’ prioritisation of local engagement, including through Norlys’ Vækstpulje (Norlys growth pool), which supports local projects in and outside the ownership region.</li> </ul>
 <b>Board of Representatives</b>	<ul style="list-style-type: none"> <li>• Wants to ensure that Norlys moves in a direction which is aligned with the interests of members.</li> <li>• Wants to strengthening the cooperative democracy.</li> </ul>	<ul style="list-style-type: none"> <li>• Dialogue meetings with the chairmanship and the Executive Board every six months.</li> <li>• Annual meeting at the Board of Representatives.</li> <li>• Board of Representatives’ intranet with news, discussion forum and knowledge bank.</li> </ul>	<ul style="list-style-type: none"> <li>• Impact on Norlys’ strategic priorities, including the target of climate neutrality.</li> <li>• Helps to set the overall vision for Norlys’ business model.</li> </ul>
 <b>Employees</b>	<ul style="list-style-type: none"> <li>• Want good working conditions, well-being, inclusion, health and safety as well as good personal development opportunities.</li> <li>• Want to be part of a diverse workplace where they contribute positively to society and the green transition.</li> <li>• Norlys wants to attract and retain talent and learn about new employee expectations.</li> </ul>	<ul style="list-style-type: none"> <li>• Employee satisfaction survey and workplace assessment.</li> <li>• Annual People &amp; Development conversations.</li> <li>• Cooperation Committee.</li> <li>• Health and safety organisation.</li> <li>• Daily communication on intranet.</li> </ul>	<ul style="list-style-type: none"> <li>• Contributes with insights about strategic work to improve safety, equal opportunities for all, employee development and inclusion.</li> </ul>
 <b>Customers and potential customers</b>	<ul style="list-style-type: none"> <li>• Want a secure experience when using Norlys’ digital products.</li> <li>• Norlys wants to understand the customers’ needs and their experience of Norlys to be able to adapt our product portfolio and prioritise ESG initiatives.</li> </ul>	<ul style="list-style-type: none"> <li>• Customer panels.</li> <li>• Qualitative analysis with customers and potential customers.</li> <li>• Dialogue through customer support</li> </ul>	<ul style="list-style-type: none"> <li>• Improving Norlys’ cyber security, including protecting customer data, blocking illegal content and preventing SMS fraud.</li> <li>• Strategic work with ESG certifications and climate targets.</li> </ul>
 <b>Investors</b>	<ul style="list-style-type: none"> <li>• Want transparency on progress towards climate targets, ESG ratings and financial performance.</li> </ul>	<ul style="list-style-type: none"> <li>• Board meetings in relevant companies.</li> <li>• ESG ratings.</li> <li>• Ongoing reporting and dialogue.</li> </ul>	<ul style="list-style-type: none"> <li>• Influence on objectives and strategy, including science-based climate targets, Sinal improving its GRESB score as well as working with the EcoVadis score and supply chain management.</li> </ul>
 <b>Suppliers</b>	<ul style="list-style-type: none"> <li>• Want to ensure satisfactory deliveries and good cooperation with Norlys.</li> <li>• Norlys wants dialogue about climate targets and the climate emissions of products.</li> <li>• Norlys wants to ensure that suppliers adhere to our compliance and ethics policies and standards – including working conditions.</li> </ul>	<ul style="list-style-type: none"> <li>• Contractual relationships and supplier due diligence.</li> <li>• Kundeselskabet has begun the implementation of ESG screening of major suppliers.</li> </ul>	<ul style="list-style-type: none"> <li>• Work with responsible corporate governance. For more details, please see <a href="#">G1-1</a>.</li> <li>• Kundeselskabet has begun the implementation of ESG screening of major suppliers.</li> <li>• The dialogue with suppliers influences our current work with responsible supply chain management. For more details, please see <a href="#">G1-2</a>.</li> </ul>
 <b>Authorities</b>	<ul style="list-style-type: none"> <li>• Want to ensure critical infrastructure protection.</li> <li>• Want transparency about Norlys’ practices, policies and objectives.</li> </ul>	<ul style="list-style-type: none"> <li>• Direct dialogue with authorities.</li> <li>• Consultation responses.</li> <li>• Contributes with professional sparring to working committees.</li> </ul>	<ul style="list-style-type: none"> <li>• Influence on how we adapt our internal policies, strategy and objectives.</li> </ul>
 <b>Trade associations</b>	<ul style="list-style-type: none"> <li>• Want to promote sector interests.</li> <li>• Want to exchange knowledge about work with ESG and the assessment of material issues.</li> </ul>	<ul style="list-style-type: none"> <li>• Networking.</li> <li>• Meetings and committee work.</li> <li>• Joint consultation responses.</li> </ul>	<ul style="list-style-type: none"> <li>• Influence on our internal policies, strategy, organisation and practices.</li> </ul>

# Interaction between material IROs and the strategy and business model

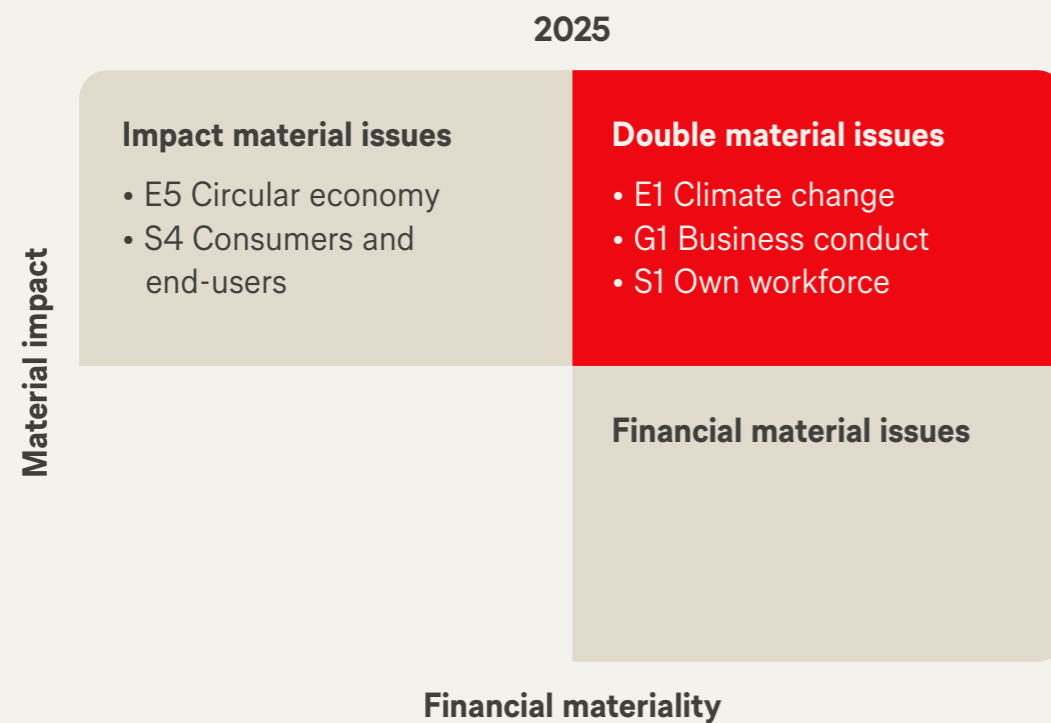
## SBM-3

In 2025, Norlys updated its double materiality assessment ('DMA') based on the guidelines in ESRS (July 2025). The DMA is conducted at group level and includes all legal entities as described under 'General information'. This resulted in a complete and updated DMA. As described in the introductory section, this sustainability report is prepared voluntarily. In 2025, the results of the updated DMA for Norlys are as follows for the areas that have been assessed as significant.

The table shows Norlys' material impacts, risks and opportunities ('IROs'). Further descriptions of these and the relationship with Norlys' strategy and business models can be found under the topic-specific sections of the report. How Norlys handles or plans to handle significant IROs is described in the relevant sections

through policies, actions and objectives, and the descriptions in this report are consolidated at group level. In the preparation of the DMA, the individual material IROs are described in more detail for the relevant companies, so that the companies can each work with these in their specific business areas.

In particular, the material IROs described under E1 Climate change may have economic effects due to the Group's climate neutrality target. Therefore, the relevant planning is discussed by the companies' management and Boards of Directors. References to the annual report and reporting on the current financial impact are not included at present, as Norlys is not subject to CSRD before the financial year 2027.



<b>E</b>		<b>IRO</b>	<b>+/-</b>	<b>F/P</b>	<b>E/VC</b>
	<b>E1 Climate change</b>				
	<b>Climate change mitigation</b>				
	Scope 1 + 2	I, R	-	P	E
	Scope 3	I, R	-	P	E, VC
	Long-term investments in infrastructure	O	+	F	VC
	Electrification	I, O	+	F	E, VC
	<b>Climate adaptation</b>				
	Extreme weather events and climate adaptation of infrastructure	I, R	-	P	E, VC
	<b>Energy</b>				
	Transport of electricity leads to grid loss	I	-	F	E
	<b>E5 Circular economy and resource use</b>				
	<b>Outgoing resources related to products</b>				
	Products and units	I	-	P	VC

<b>S</b>		<b>IRO</b>	<b>+/-</b>	<b>F/P</b>	<b>E/VC</b>
	<b>S1 Own workforce</b>				
	Health and safety risks	I	-	F	E
	Diversity, equal treatment and inclusion	R	-	P	E
	<b>Consumers and end-users</b>				
	IT and cyber security, data protection	I	-	P	VC
	Security of supply of critical infrastructure	I	-	P	E, VC

<b>G</b>		<b>IRO</b>	<b>+/-</b>	<b>F/P</b>	<b>E/VC</b>
	<b>G1 Business conduct</b>				
	Protection of whistleblowers	I	-	F	E
	Political influence and lobbying activities	I	+	F, P	E, VC
	Political focus on critical infrastructure	I	-	P	VC



**Abbreviations**

- I Impact
- R Risk
- O Opportunity
- + Positive
- Negative
- F Actual
- P Potential
- E Own operation
- VC Value chain

# Description of the processes to identify and assess IROs

## IRO-1

In 2025, Norlys updated our double materiality assessment. In particular, the purpose of the update was to incorporate the Group's organisation as of 2025 and knowledge from previous years' sustainability processes, such as carbon accounting insights. At the same time, we have increasingly linked IROs to company level, allowing them to be considered in the companies, both in terms of strategy and concrete actions. This work has already started, with impacts and risks being raised with the companies' management and addressed by the Audit and Risk Committees of the core companies. In this way, decisions regarding IROs are made by the right entities in the companies or at Group level.

Norlys' double materiality assessment covers the companies and entities reported on in this sustainability report. The companies' own activities and the business activities of their value chains have all been addressed in Step 1 'Identification of impacts, risks and opportunities', which is described in the following sections. ESG managers and specialists from all companies are involved. The double materiality assessment is part of Group ESG's general due diligence process.



## Process description



# Environment

## Highlights 2025



### Validated climate targets

Norlys has had its climate targets validated by the Science Based Targets initiative (SBTi). This confirms that our short-term and long-term net zero targets are scientifically based and in line with the 1.5°C target from the Paris Agreement. By the end of 2025, only about 2,350 companies globally had achieved this recognition.



### More electrification for heavy goods transport

In heavy goods transport, Norlys is pushing electrification with the opening of five charging hubs around Denmark, giving heavy vehicles access to en-route charging.



### Climate requirements in the value chain

In the context of the SBTi validation, we added a voluntary target that 67% of our purchases by 2030 must be made through suppliers with climate targets that meet the Paris Agreement. In 2025, this figure is 46%.



### Circular solutions in practice

Norlys is committed to circular use of materials through takeback and refurbishment schemes for mobile phones, network equipment and charging stations. With the Byt til Nyt (swap for new) and Pre-loved concepts, we extend the life of the products through reuse, repair and resale and help more people return their used devices for recycling.



### Seven new public charging points every day

The expansion of Norlys' nationwide EV charging network continued in 2025 with the installation of more than 2,700 new public charging points and the opening of six new charging hubs for passenger cars.



### Reduced emissions

From 2024 to 2025, Norlys' total GHG emissions were reduced by 12%. This is primarily due to the fact that the Danish electricity grid uses renewable energy sources more than previously.

# Climate change



E1

Climate change is one of the most pressing challenges of our time and contributes to massive impacts on people, the environment and society. Norlys recognises its role in supporting the transition to an electrified society and is working ambitiously to promote the green transition.

We acknowledge that there is a long way to go, and we need to take responsibility and act faster than before. The transition provides significant growth opportunities, but also challenges – especially in the value chain. Therefore, we work closely with suppliers, advisers, trade associations and policy makers to promote climate-friendly solutions and meet increasing demands from authorities, the market and our stakeholders. By combining internal efforts with strong partnerships, we can enable the necessary transition, achieve our climate targets and follow the Paris Agreement’s goal of limiting global warming to below 1.5°C as well as the EU’s climate objectives.

In 2025, Norlys achieved an important milestone with validated science-based targets through the Science Based Targets initiative (SBTi). In addition, a key focus has been to refine data, prepare company-specific climate action plans and map ESG risks as the basis for strategic decisions towards 2030 and 2040. We are ambitious, but also realistic about the challenges we face along the way. That is why we integrate ESG into our business and prioritise projects that contribute to achieving our climate goals.

Our material impacts, risks and opportunities are the focal point of policies, targets and action plans to ensure resilience and support the strategy. We closely monitor developments and adapt our business to manage risks and exploit climate-related opportunities.

## Norlys’ material impacts, risks and opportunities

### Climate adaptation

#### Strategy and business model:

Norlys delivers critical infrastructure that contributes to the transition to a climate-neutral society. Climate resilience is necessary to secure our services and is therefore an increasingly strategic priority as the risk of extreme weather events increases.

#### Extreme weather events: I

Extreme weather events, due to climate change, pose a risk of destruction of infrastructure and can cause temporary supply disruptions and outages. As responsible for critical infrastructure, not adapting to climate change can have a potentially negative impact on society.

**Time horizon:** Long



#### Climate adaptation of infrastructure: R

Extreme weather events, due to climate change, pose a risk of destruction of infrastructure. Climate change increases the risk that Norlys’ infrastructure may be affected by extreme weather events with significant costs as a consequence.

**Resilience:** In 2026, Norlys will perform a comprehensive climate resilience analysis to make information-based decisions in the companies.

**Time horizon:** Long



### Energy

#### Strategy and business model:

The strategic goal of Elnetselskabet N1 is to reduce the climate impact, including reducing emissions from grid loss.

#### Transport of electricity leads to grid loss: I

When electricity is transported from energy-generation facilities to electricity customers, energy is lost along the way as heat in cables, heat in overhead lines and heat in substations. Elnetselskabet N1, like all other grid companies, therefore experiences grid loss in the transported electricity. The grid loss is a significant source of Norlys’ emissions, and because the amount of electricity transported in the coming years will increase, grid loss will – all things being equal – also increase.

**Time horizon:** Independent



#### Abbreviations

- I Impact
- R Risk
- O Opportunity
- + Positive
- Negative
- F Actual
- P Potential
- E Own operation
- VC Value chain

## Norlys' material impacts, risks and opportunities

### Climate change mitigation

#### Strategy and business model:

Greenhouse gas emissions are an inevitable part of doing business. It is therefore an essential part of Norlys' strategic work to address the negative impacts and risks associated with greenhouse gas emissions, and this is directly addressed in all parts of the business model. Norlys invests strategically in expanding critical infrastructure in line with our business model. In the strategy period 2024-2027, approximately DKK 7 billion will be invested in future-proofing the electricity grid, DKK 3.4 billion in fibre networks and DKK 2.3 billion in charging infrastructure. Operation, maintenance and expansion of electricity grids and rapid connection of renewable energy are the foundation of our business model and thus, fully aligned with the strategic priorities.

#### Scope 1 and 2: I

All companies have their own emissions, but significant greenhouse gas emissions that can affect climate change are present in SF<sub>6</sub> (sulfur hexafluoride) emissions and in the grid loss.

Time horizon: Long



#### Scope 1 and 2: R

Purchasing certified power from renewable energy or PPAs will incur an additional cost until grid electricity is produced exclusively from renewable energy. Meanwhile, new legislation has been adopted which requires all new SF<sub>6</sub> substations to become SF<sub>6</sub> free.

**Resilience:** The Board of Directors and the business have prepared an analysis and action plan based on different scenarios.

Time horizon: Medium



#### Scope 3: I

A few Scope 3 categories account for a large share of the Group's total greenhouse gas emissions. This concerns emissions from purchased goods, the sale of gas and electricity, as well as the continued use of fossil fuels in the energy mix generating the electricity being transported.

Time horizon: Long



#### Scope 3: R

In 2022, the Social Democratic government and a large number of the parties in the Danish Parliament agreed on a climate agreement that set two targets for Denmark's gas consumption: All gas must be green by 2030, and no homes must be heated with gas after 2035. It involves a financial risk to continue to have that business segment.

**Resilience:** Kundeselskabet has developed a business model, including the ambition to transition customers within this business to other types of heat sources.

Time horizon: Long



#### Long-term investments in infrastructure: O

Norlys' ownership model as a cooperative supports long-term investments that future-proof the infrastructure which will support a digital Denmark and electrification of the country based on renewable energy. The long-term investments mean that Norlys contributes both directly and indirectly to the green transition for consumers and businesses by creating conditions and incentives that make it easier for them to reduce their climate footprint.

Time horizon: Long



#### Delivery of electricity and connection of renewable energy production: I

A stable and efficient electricity grid is crucial for the green transition, as it allows more than 805,000 grid customers to electrify their energy consumption. Renewable energy production is also connected, helping to ensure that the electrification is increasingly powered by renewable energy. Consequently, the grid has a material positive impact on reducing climate change.

Time horizon: Long



#### Increased electrification of Denmark: O

Increased electrification requires the grid to transport significantly more electricity than before.

Time horizon: Short



#### Abbreviations

- I Impact
- R Risk
- O Opportunity
- + Positive
- Negative
- F Actual
- P Potential
- E Own operation
- VC Value chain

# Policies to address climate change

E1-4

At Norlys, our core principles serve as a guide for how we take responsibility – including in the fight against climate change. We want to create positive changes for the climate by collaborating and by rethinking our business activities. With business areas within energy and telecommunications, we have a unique opportunity to accelerate a responsible transition that both reduces the climate footprint and future-proofs critical infrastructure. This requires scale and a long-term perspective that is best achieved in collaboration to create significant value.

Our strategy and climate goals are underpinned by policies and encompass climate change, climate adaptation and other environmental commitments. In addition to the Supplier Code of Conduct, which sets requirements for suppliers' climate efforts, our work is safeguarded by our climate, energy, environment, and biodiversity policies. The purpose of the policies is to ensure that we continuously reduce our climate footprint and energy consumption and minimise impacts on the environment and biodiversity. The policies set out principles that guide our daily work and help identify risks and opportunities to protect and improve the environment. We are continually testing new methods

and investing in technologies that make our operations more energy efficient while maintaining reliability of supply. We regularly report on objectives, progress and actions that support our climate goals and ensure the best possible protection of our infrastructure against climate events. The policies contain concrete targets for reducing greenhouse gas emissions and summarise our approach to energy efficiency and environmental and biodiversity considerations in business activities. They serve as an overarching framework across the Group, while business-specific actions are prepared in the individual companies through climate action plans, ensuring they are adapted to their specific circumstances and generate the greatest value possible.

The policies will be updated in 2026 with new environmental areas and clearer commitments to strengthen our efforts and ensure the achievement of our climate goals. They oblige us to follow relevant standards and comply with applicable legislation, including the Danish Climate Act. As part of this effort, we implement energy management in Norlys Group, Sinal and Kundeselskabet in accordance with ISO 50001, which ensures systematic efforts in energy efficiency. As a

collective electricity distribution company, Elnetselskabet N1 is not subject to the requirement for energy management but is subject to the requirement to prioritise energy efficiency in planning and operations instead.

The policies apply to all majority-owned companies in the Norlys Group and is anchored under the Norlys Group CFO, who is also responsible for ensuring that the policies are implemented and complied with. The day-to-day management is handled by Group ESG, which is also responsible for the annual update of the policies. It is the individual managers' responsibility to make the employees aware of the existence of the policies and ensure compliance with the policies. Compliance with the policies take into account the functional separation of Elnetselskabet N1 from the rest of the Group, including the requirement for independent decision-making powers. This also applies to procurement, including the exemption from selected requirements for suppliers.

The policies are available both internally on the intranet and externally at Norlys.dk.

# Climate targets

## E1-6

At Norlys, we are committed to reducing our climate footprint when we supply energy, charging solutions, TV, mobile and internet to our customers – both from our own activities and from our upstream and downstream activities in the value chain. To reduce our greenhouse gas emissions, we have set ambitious but also realistic reduction targets.

In 2025, Norlys had its climate targets validated by the Science Based Targets initiative (SBTi), which will help ensure that we are on the right track. SBTi is a global initiative that sets science-based climate targets in line with the Paris Agreement’s goal of limiting global warming to below 1.5°C. We have both concrete 2030 targets and a long-term plan to achieve climate neutrality by no later than 2040. For the first time, we are reporting on the SBTi targets.

We are continuing to internally track and externally report on the climate targets, as the measurements indicate our path towards the intended results, and climate change is a central concern in our business activities, strategy and daily operations. Therefore, we are continuously adapting our business activities to meet our climate targets.

## Overall reduction targets

The SBTi verified net zero targets include Scope 1, 2 and 3 with a 100% reduction by 2040, as well as a 42% location-based target for Scope 1 and 2 by 2030. According to SBTi guidelines, at least 90% of the reduction must be made through actual emission reductions, while up to 10% can be neutralised by other means to achieve net zero. The objectives are science-based and compatible with the 1.5°C scenario of the Paris Agreement and follow a reduction path of at least 4.2% annually. The accounting policies applied to our

carbon accounting are set out in section [E1-8](#).

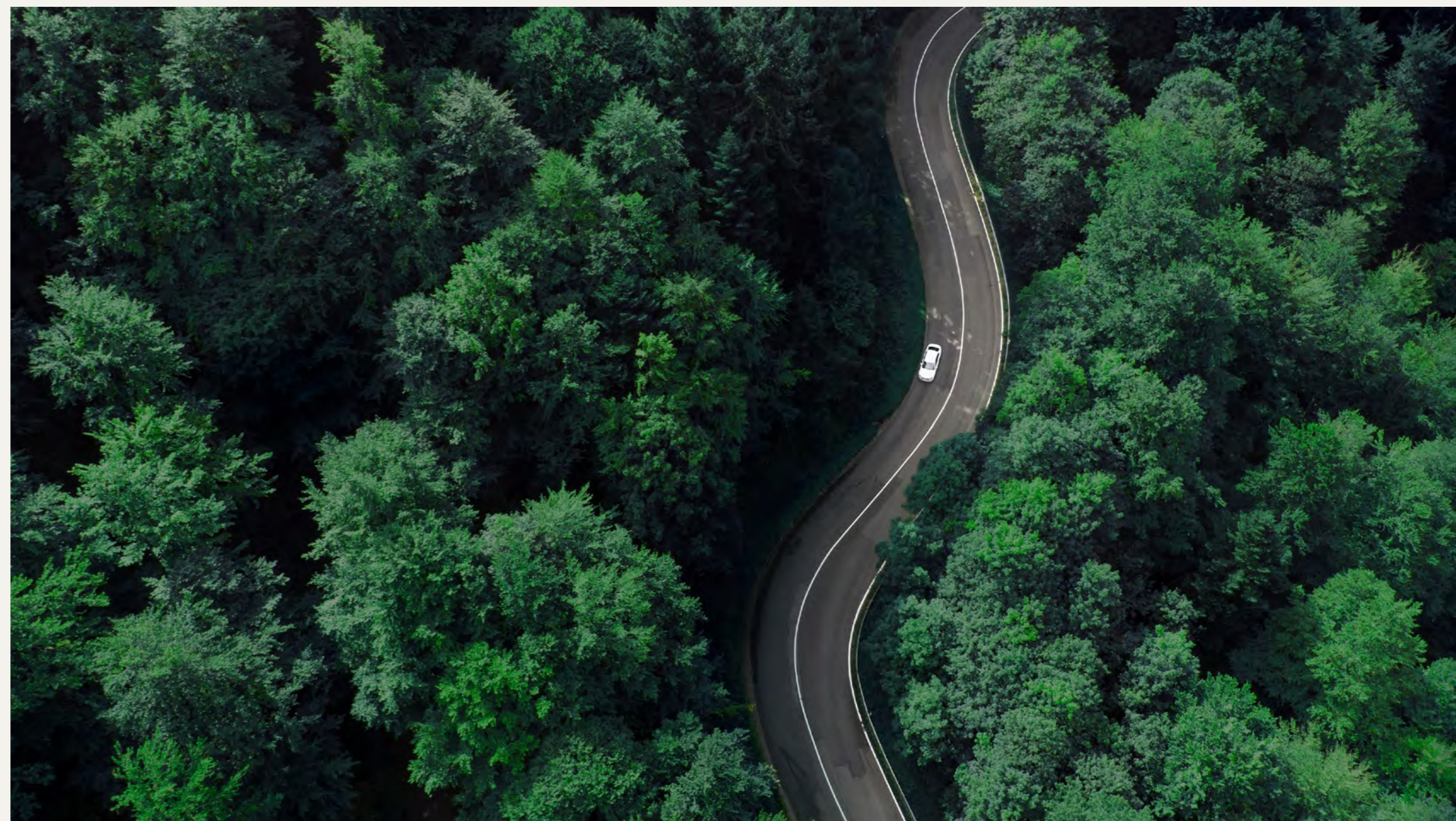
In addition to the above, Norlys has an internal climate target of reducing Scope 1 and 2 by 100% as early as 2030, with part of the reductions being made through offsetting. We prioritise the reduction of actual emissions. Offsetting plans are shown in section [E1-9](#).

From 2024 to 2025, we made the following progress towards our climate targets:

- 18% reduction in own operations (Scope 1 and 2), which corresponds to almost half of the SBTi approved target of a 42% reduction by 2030 compared to the base year.
- 12% reduction in the SBTi approved target of 100% reduction in total GHG emissions by 2040.

The reductions in both our own operations and total emissions show a very positive development and support our progress towards meeting the long-term climate targets. Overall, Norlys is well on its way in the transition to a lower climate footprint.

Read more about the changes in carbon accounting under [Climate impact](#).



SBTi validated climate targets and GHG emissions	2025 (tCO <sub>2</sub> e)	Base year 2024 (tCO <sub>2</sub> e)	Target for absolute emissions 2030 (tCO <sub>2</sub> e)	Target for absolute emissions 2040 (tCO <sub>2</sub> )	Norlys' climate targets 2030 (offsetting can be used)	Reduction target 2030 (without use of offsetting)	Reduction target 2040
Scope 1 and 2, location-based	43,970	53,337	30,935	0	100%	42%	100%
Scope 1, 2 and 3, location-based	1,061,529	1,204,634		0			100%

## Targets for sold gas and electricity

In addition to the overall reduction targets, Norlys has set SBTi validated targets for absolute reductions of sold gas as well as gross intensity targets to reduce greenhouse gas emissions per MWh for sold electricity.

### Sold gas

In 2025, Norlys reduced emissions from sold gas by 12% compared to the base year 2024. The reduction is primarily due to the fact that less natural gas was sold during the period.

### Sold electricity

Norlys is working to electrify Denmark and give customers access to electricity with the lowest possible emissions. Therefore, the target for sold electricity is not an absolute reduction, but an intensity target, as we want to increase the sales of electricity. The projection for 2030 is based on the assumption that Norlys maintains its current share of

electricity sold nationwide and is aligned with the Danish Energy Agency's latest climate status and projection document for 2023. This means that we expect to increase sales by more than 35% compared to 2024.

In 2025, Norlys emitted 23% less CO<sub>2</sub>e per MWh of sold electricity than in 2024. This is partly due to the fact that electricity in Denmark is derived from more renewable energy sources than 2024, and that electricity was sold through the subsidiary GreenLab in 2025, which was not the case in 2024. It comes from renewable energy sources, which is why it has a positive impact on the intensity target. For accounting policies, read more under [Climate impact](#).

In addition to our climate policy, the targets are supported by our climate transition plan.

SBTi validated reduction targets for sold gas	2025 (tCO <sub>2</sub> e)	Base year 2024 (tCO <sub>2</sub> e)	Anticipated absolute emissions 2030 (tCO <sub>2</sub> e)	Anticipated absolute emissions 2040 (tCO <sub>2</sub> e)	Reduction target 2030	Reduction target 2040
Sold gas	389,963	441,863	256,281	0	42%	100%

SBTi validated reduction targets for sold electricity	2025 (tCO <sub>2</sub> e per MWh)	Base year 2024 (tCO <sub>2</sub> e per MWh)	Anticipated absolute emissions 2030 (tCO <sub>2</sub> e)	Anticipated absolute emissions 2040 (tCO <sub>2</sub> e)	Reduction target 2030	Reduction target 2040
Sold electricity	0.08	0.11	212,215	N/A	64 %	92.7%





# Transition plan for climate change mitigation

E1-1 & E1-5

As an energy company, investor in solar and wind and owner of critical infrastructure, Norlys has both the responsibility and the opportunity to lead the way in the green transition. We have therefore set ambitious climate targets supported by concrete actions – now and in the long term – to reduce greenhouse gas emissions and help mitigate climate change.

Much of the transition plan is delivered through short-term as well as long-term actions to contribute to the achievement of our climate targets for 2030 and 2040. The plan includes fundamental decarbonisation pathways covering Scope 1, 2 and 3, and focuses on the transition of our own operations as well as the value chain. Elnetselskabet N1 and Sinal have also prepared separate climate plans that support Norlys' climate goals and address business-specific challenges. Kundeselskabet's climate plan is being prepared, and the other subsidiaries are contributing to Norlys' climate goals through activities such as energy optimisation and electrification of the industry. All companies work in line with Norlys' strategy.

Along the way, some areas may prove to be far more important than initially assumed, and there is greater uncertainty associated with measures and developments in the market towards 2040. Innovation, the development of new technologies, as well as international policies and standards play a crucial role in the reductions throughout the value chain. Our approach combines investments in measures where we have a high degree of control, with stakeholder involvement and political influence and lobbying activities in areas where we rely on external factors such as legislation, market, technology and infrastructure to achieve the goals.

As there are no sector-specific methods covering all of Norlys' business areas, we follow a general approach to reducing greenhouse gas emissions.

Case

## Charging stations for heavy goods transport and support for electric buses – VIKINGBUS

**Electrification of heavy goods transport is progressing**  
Norlys invests heavily in establishing a nationwide EV charging network for heavy goods transport. It is expected that three out of four trucks will run on electricity by 2030, which will increase demand for charging stations for heavy goods transport. In 2025 alone, Norlys opened five new charging hubs for heavy goods transport in Randers, Herning, Vejle, Korsør and Køge, making it easier for heavy vehicles to access en-route charging throughout Denmark.

The demand for electric heavy goods transport is also seen by the bus companies. In 2025, Norlys and VIKINGBUS entered into a partnership with Norlys acting as a charging partner to support VIKINGBUS' transition to fossil-free bus operations by developing, establishing and operating the company's overall charging infrastructure. VIKINGBUS buses run a total of 60 million kilometres annually, and today around 14 per cent of the company's buses run on electricity, but the ambition is to add even more electric buses to the fleet.



## Decarbonisation of own operations

Norlys is undergoing a significant transformation from fossil fuels to the expansion of renewable energy and a responsible transition. This development is driven by investing heavily in our own assets, reducing grid loss, streamlining processes and modernising critical infrastructure.

### Electrification of the vehicle fleet and improving driving efficiency

Currently, a comprehensive transition is taking place to electric vehicles across the entire vehicle fleet, including passenger cars, vans and trucks. As Denmark's second largest provider of public charging stations, it is natural that our own fleet follows suit. The vast majority of passenger cars in the company car scheme have been replaced with electric cars, and vans are expected to be replaced by 2030.

In Sinal, the fleet consists of 230 vans, of which 30 were

driven on electricity in 2025. This figure is expected to at least double by 2026. Elnetselskabet N1 has entered into a lease agreement for electric vans, with pilot testing in spring 2026, which will provide insights into possible solutions for the transition of the vans. At Kundeselskabet, the plan for electrification of vans is well-established, and the vans will be replaced as existing leases expire in 2026 and onwards. The first vans will be electrified in 2027. In OpenNet, the fleet of vehicles is exclusively electric.

For those vehicles that continue to run on fossil fuels, we are continuously working on route optimisation to reduce fuel consumption and carbon emissions. The purpose is to plan the routes so that fewer kilometres are driven and thus, fewer particles are emitted.

### SF<sub>6</sub> gas:

The biggest challenge in Scope 1 is SF<sub>6</sub> gas from switchgear

in the electricity grid, where the gas is used as an effective insulating and arc-quenching medium in electrical switchgear. SF<sub>6</sub> gas is contained within the switchgear itself, but when working with gases there is a risk of leakage, and we are actively working to reduce emissions with targeted initiatives.

Elnetselskabet N1 is monitoring technological developments and in 2025, they launched targeted leak detection and repair to reduce emissions.

### Grid loss

A particular challenge in Scope 2 is grid loss, which occurs when part of the electricity transported through cables and transformers in the electricity grid is inevitably lost as heat. In connection with the transport of electricity, there are natural operating losses inherent in the process, and we expect that increased power consumption and load on the electricity grid will lead to an increased grid loss. This happens because the operating loss does not scale linearly with the amount of power supplied. Therefore, decarbonisation of grid losses must be achieved by ensuring as much renewable energy as possible in our electricity grid, and Elnetselskabet N1 is committed to limiting grid losses through optimisation of operations.

### Energy efficiency improvements

We are committed to reducing emissions associated with energy consumption by ensuring the use of renewable energy and a systematic approach to minimising energy consumption. Energy efficiency is a key factor in achieving our climate goals, and we have an ambition to decarbonise our operations by continuously improving energy efficiency and using energy from renewable sources. As a player in the entire electricity value chain, we also support the expansion of renewable energy.

In 2025, Norlys initiated energy management in accordance with the ISO 50001 standard, which will ensure continuous improvements, compliance with legislation and energy efficiency improvements. Energy management involves monitoring, control and continuous improvement of



In addition to this, there are three tractors and 26 trucks.

The proportion of electrified passenger cars and vans for 2024 and 2025 is marked in red, and the proportion of vehicles running on fossil fuel is shown in black.



energy processes with the aim of reducing energy consumption, costs and environmental impact. In practice, this means, among other things, that we have worked on efficiency improvements at our locations, including:

- Consolidation of previous locations into a single, newly built location that houses several companies in Norlys. The building is DGNB-certified at Gold level and heart, and thus meets environmental considerations in construction, choice of materials and operation as well as indoor climate requirements. At the same time, the inventory has been significantly reduced, and the new location has enabled the divestment of another location heated with natural gas. OpenNet has also moved to a DGNB-certified building at Gold level – with insect hotels, solar cells on the roof, charging stations, rainwater infiltration and other environmental considerations.
- Gudenaacentralen a.m.b.a. (hereinafter referred to as “Gudenaacentralen”) is undergoing a comprehensive renovation, with the energy supply changing from pure electric heating to heat pumps. In addition, a new HVAC system is being installed, reusing heat from the building and process heat from the generator system for heating.
- Sinal is installing free cooling and hydrogen-based backup power in the technical hubs, and where possible, solar cells are being installed on the roofs. At the same time, the old fibre technology is being changed to modern platforms, reducing power consumption despite increasing data volumes. Approximately 20 hubs are being converted every year, in order of priority, with the oldest buildings first, to ensure the greatest possible reductions in emissions. At present, about a third of the technical hubs have been converted.

Norlys has also entered into Power Purchase Agreements (PPAs) that ensure power from solar cells and wind turbines for a large part of the consumption in the networks as well as customer-facing businesses. The agreement encourages new and additional solar and

wind farms that will supply renewable energy to cover part of Norlys’ power consumption from 2027 at the latest. As a result of its business model, Norlys Energy Trading will use additional PPAs that reduce the climate footprint, create greater price stability for electricity grid companies and promote the expansion of renewable energy.

**Investments in renewable energy**

Norlys invests heavily in solutions that support the green transition and electrification of Denmark.

In 2025, Sinal invested a double-digit million figure in making the fibre network more energy-efficient, and the fibre network is continuously being modernised with new technology. In addition, Elnetselskabet N1 is investing heavily in the expansion and modernisation of the electricity grid in the coming years. In addition to modernising the fibre network and the electricity grid, we are also investing heavily in the charging infrastructure in Denmark. In 2025, Norlys inaugurated a nationwide EV charging network for heavy goods transport, which contributes to the electrification of heavy road transport.

Norlys is co-owner of Eurowind Energy and GreenLab, both of which are working on developing the energy solutions of the future. Eurowind Energy builds and operates wind and solar farms, while GreenLab serves as a green industrial park and national test hub park for new technologies. GreenLab’s intelligent energy platform develops solutions for energy storage and resource efficiency.

Through Greenlab’s activities, renewable energy is supplied to the companies in the industrial park via an internal symbiosis network, where the energy comes from Eurowind Energy’s wind and solar farms. Work is ongoing to optimise and exploit resource flows during operation. GreenLab is also developing new offerings for companies, and in 2025 efforts were made to provide heating services based on electricity. For example, an electric boiler has been installed to convert green power into heat and supplies the heat to the biogas plant in the industrial park,

which displaces the use of natural gas. GreenLab has also investigated a solution where excess renewable energy production can be used in a stone-based thermal storage solution. Work on this solution will continue in 2026.

Norlys is also investing in energy storage through an intelligent battery park in collaboration with XOLTA. The project will ensure better use of renewable energy and contribute to balancing the electricity grid. The battery park is a pilot project that runs from 2024-2027 and will explore the commercial potential of batteries.

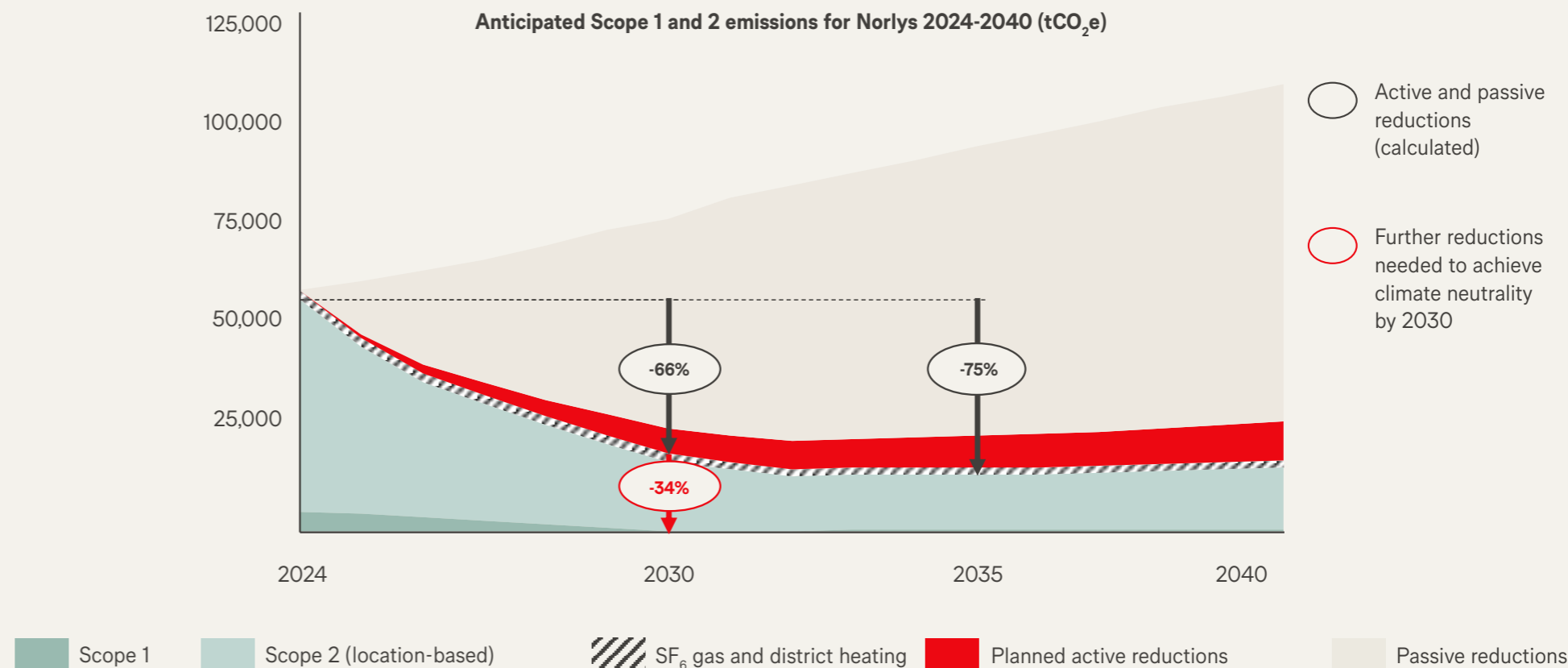
**Anticipated reductions in Scope 1 and 2**

The graph shows Norlys’ expected development in Scope 1 and Scope 2 emissions towards 2040 based on an

assumption of approx. 3% annual growth. The projections were prepared for the 2024 report and will be updated every five years.

The forecast includes both active reductions (e.g. electrification of vans and phasing out natural gas) and passive reductions as a result of a greener electricity and gas grid.

The dotted line illustrates that certain emissions – including SF<sub>6</sub> gas and district heating – cannot be completely eliminated. Overall, a reduction of approximately 66% is expected in 2030 without climate offsetting, highlighting the need for further action to achieve the net zero target.



## Decarbonisation of the value chain

The value chain transition plan includes strategic initiatives focusing on the continued development of initiatives to reduce Scope 3 emissions. There is increased complexity in the value chain activities, so we prioritise initiatives that we can implement and influence ourselves – among other things, through supplier collaboration, responsible procurement, efficient use of resources as well as the development of products and services – which is also where our greatest emissions occur.

The energy industry plays a key role in addressing climate change and accelerating the deployment of renewable energy. At the same time, our physical products for customers present significant challenges but also opportunities to reduce climate impacts. We therefore have not only a responsibility, but also a unique opportunity to take an active part in the transition to a more climate-responsible society that can inspire others.

Norlys' Vækstpulje also supports projects and initiatives in society that make a difference to the community and the green transition. In 2025, 984 projects received funding – including projects in energy efficiency such as solar and geothermal plants, energy renovation, environmental optimisation and climate resilience. Vækstpuljen is awarded several times a year and will continue to support climate-improving initiatives in 2026.

### Responsible sourcing and use of resources

At Norlys, we have a proactive approach to supplier collaboration and set clear requirements for environmental criteria. We enter into collaborations to improve results and ensure decarbonisation of suppliers' activities – and thus, also our own. Procurement of goods and

services as well as capital expenditures require us to rethink our procurement practices and work closely with suppliers to reduce emissions.

In this connection, Norlys has a target (verified by the Science Based Targets initiative (SBTi)) that by 2030, 67% of the consumption of purchased goods and services, Scope 3 category 1, must be through suppliers with approved 2030 reduction targets in accordance with the SBTi guidelines. In 2025, 46% of Norlys' procurement costs involved suppliers in this category. Another 2.5% of suppliers have committed to having their reduction targets approved. Please note that this year's calculation includes purchased goods and services from Elnetselskabet N1, but excludes Norlys Energy Trading, Automize, Mjølner and GreenLab. Elnetselskabet N1 is exempt from the actual objective due to its monopoly status. Other subsidiaries as well as the Group, Sinal and Kundeselskabet are covered by the target, but we are currently unable to provide accurate data broken down according to this structure.

To achieve this goal, Sinal and Kundeselskabet are actively engaged with their suppliers to set climate targets. Other subsidiaries are also subject to the objective.

In 2025, we made significant efforts to integrate ESG into procurement processes and day-to-day practices where possible. Some companies have made more progress than others, but we have clear ambitions to work with suppliers to reduce emissions and take environmental considerations as part of the procurement process.

Among other things, an ESG procurement network has been established to create best practices across the core

companies, contribute to the exchange of experience, exploit synergies and bring together cross-functional initiatives. ESG is gradually becoming more integrated into procurement functions, and the process picked up pace markedly in 2025. In 2026, work continues on the integration of ESG in procurement functions and supplier collaboration.

At Kundeselskabet, environmental criteria have become an integral part of supplier evaluation with the ambition to evaluate suppliers in all major procurement processes. However, there might be cases where ESG is difficult to prioritise due to the type of procurement. Whether, and with which weighting, ESG criteria are included in the overall supplier assessment is decided in cooperation between the sourcing manager and the business. Suppliers are evaluated based on the following three focus areas:

- SBTi targets or climate targets in accordance with the Paris Agreement based on Norlys' climate targets.
- EcoVadis score or medal, including social and ethical principles such as human rights and anti-corruption and anti-bribery.
- CO<sub>2</sub>e data quality to support the above two criteria.

Kundeselskabet's procurement team has established internal ESG KPIs to measure and evaluate strategic initiatives to strengthen the area, including in relation to suppliers' EcoVadis scores and SBTi, and several short-term and long-term goals are being developed to strengthen the area. In 2025, they also established an ESG panel with two employees from the sourcing team, which ensures continuous sparring and development of ESG in the procurement process. This work has already



## Case

### Norlys is driving the electrification of Danish infrastructure

The transport sector accounts for a significant part of Denmark's carbon emissions, and in 2025, Norlys, in collaboration with GLS, took a major step towards reducing it. We have taken over GLS's entire charging infrastructure in Denmark and delivered a tailored solution that allows them to electrify their own fleet of vans and company cars – with the flexibility to scale in line with their need. At the same time, we continue to work with McDonald's, which was initiated in 2024, to set up high-speed chargers at more than 75 restaurants.

Norlys is also continuously establishing new charging points throughout Denmark for private customers to handle the growing number of electric cars on the Danish roads. Among other things, in December, Norlys won a tender for 294 new charging points in the City of Copenhagen, and we are in the process of setting up a high-speed charging hub at Aalborg Airport, which will be ready in early 2026. In this way, we actively contribute to reducing the carbon footprint of the transport industry and strengthening the Danish charging infrastructure

produced tangible results, such as making Norlys' ESG ambitions clear to suppliers through direct communication material. Internally, an ESG page has been created on the intranet, which informs and motivates employees to prioritise ESG in tender processes.

The legislation also imposes special requirements on Elnetselskabet N1, which is subject to a public procurement obligation under the Utilities Directive, including the principle of equal treatment, the principle of proportionality and the principle of transparency. This means that they are limited in their ability to include ESG criteria in the supplier selection process.

**Development of products and services**

At Norlys, we take responsibility for more than ourselves, and it is therefore important for us to make it easier for our customers to choose responsible solutions. In addition to the expansion of the charging infrastructure, our customer-facing business works continuously on the development of products and services for both private and

business customers that contribute to reducing emissions in the value chain.

In 2025, Kundeselskabet launched a complete PPA catalogue with various PPA solutions for customers, including unspecified PPAs, specified PPAs, PPA light and co-financed PPAs (pool PPAs). The catalogue enables customers to choose a solution that suits their energy needs and actual energy volume. In this way, we contribute to expanding the share of renewable energy by adding new production to the electricity grid, supporting responsible transition and reducing the climate footprint in collaboration with customers.

Another important initiative is the development of a user-friendly energy app that enables customers to optimise their energy consumption by, among other things, displaying the carbonfootprint in real time and thus making it easier to use the power when it is most climate-friendly.

The energy business is future-proofed for a rapidly changing energy market through digital solutions that will create new opportunities for both employees and customers through automation and digitalisation. The project started in 2025 and will extend into 2027.

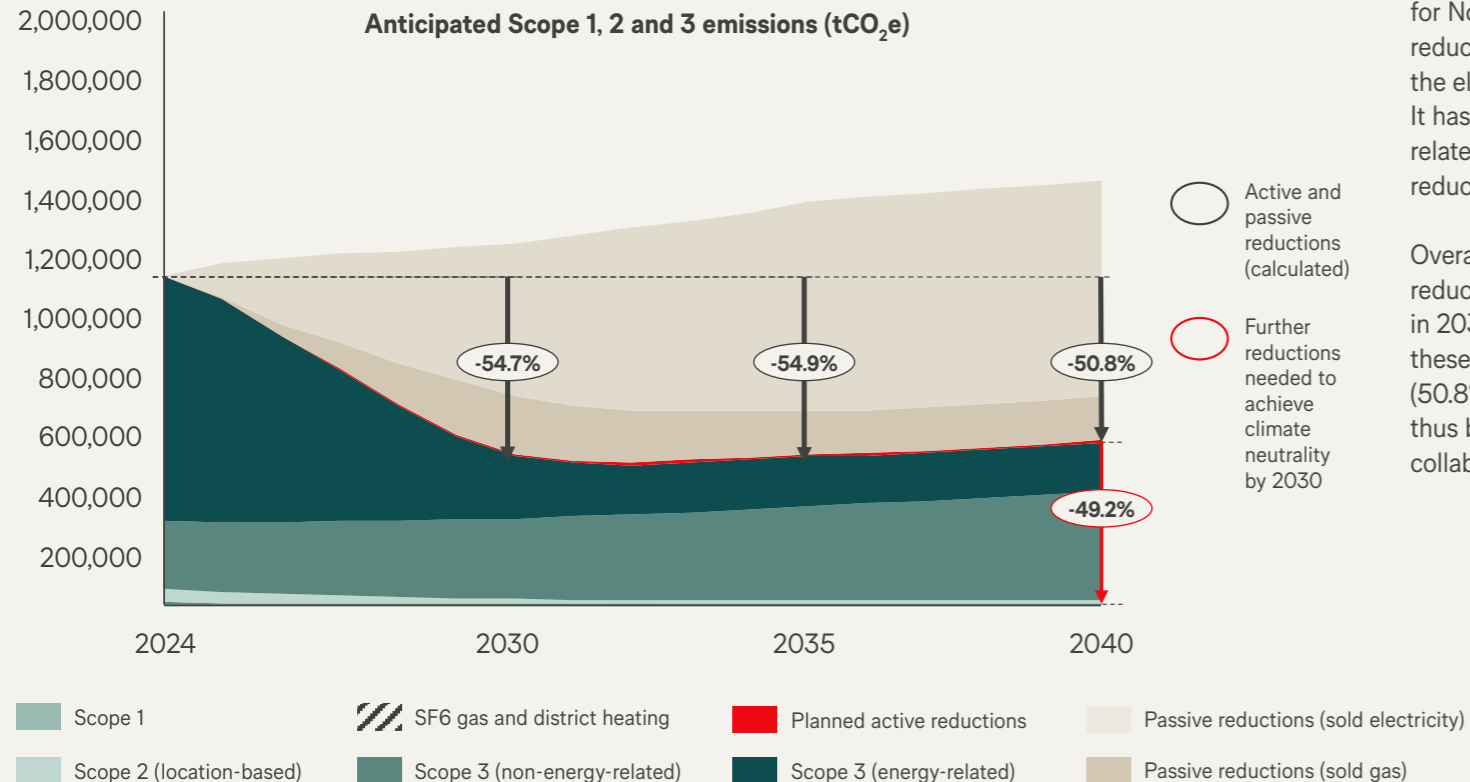
As part of reducing carbon emissions in collaboration with partners and customers, Kundeselskabet developed a CO<sub>2</sub> calculator in 2025. It provides insight into emissions at product level, increases data quality and transparency across the value chain and collects relevant data for carbon accounting. The calculator was put into use in 2025 and is expected to be published in 2026.

**Anticipated reductions in Scope 3**

The graph shows Norlys' expected development in overall carbon accounting up to 2040, based on an assumption of approx. 3% annual growth. The projections were prepared for the 2024 report and will be updated every five years.

The projection includes active reductions, as described in the figure on the expected Scope 1 and 2 emissions for Norlys 2024-2040 on page 27, as well as passive reductions – including increased renewable energy in the electricity grid and a larger proportion of biogas. It has also been taken into account that non-energy-related activities are also somewhat affected by passive reductions (cf. IEA World Energy Outlook).

Overall, it is expected that the active and passive reductions will reduce Norlys' Scope 1, 2 and 3 by 54.7% in 2030. Despite continued increased passive reductions, these are expected to constitute a smaller percentage (50.8%) in 2040. Almost half of the reductions must thus be achieved through active actions, including collaborations with customers, suppliers and partners.



Case

**Norlys App makes energy data simple – and wins Silver in the Danish Digital Awards**

The users' experiences of Norlys are important to us. We are therefore proud that the Norlys Energi app won Silver in the Best in Digital Design category in the Danish Digital Awards 2025. The Energi app enables customers to optimise their energy consumption by, among other things, displaying the carbonfootprint in real time and thus making it easier to use the power when it is most climate-friendly. The recognition comes from documented results that the app has resulted in increased customer satisfaction and higher loyalty among customers.

## Locked-in emissions

Norlys recognises the importance of managing locked-in emissions, as they are difficult to reduce and can challenge the transition plan. We are therefore working to:

- Mitigate potential risks associated with locked-in emissions.
- Phase them out where possible.
- Avoid adding new locked-in emissions.

A small proportion of the emissions come from our fleet in Elnetselskabet N1 and Sinal, which may prove problematic due to the need for heavy loads and high towing capacity. In addition, R32 refrigerant is used in our data centres, which cannot be phased out at this time. Efforts are being made to reduce the consumption through free cooling, but active cooling is still necessary for a few months a year.

The largest sources of locked-in emissions are primarily from SF<sub>6</sub> gas and procurement.

### SF<sub>6</sub> gas:

Several types of SF<sub>6</sub>-containing circuit-breakers are currently being replaced with SF<sub>6</sub>-free in the context of reinvestment or breakdown, but emissions are challenging to eliminate as it is currently very costly or technologically difficult to replace the switchgear with corresponding SF<sub>6</sub>-free alternatives. With Jutland's largest electricity grid, Elnetselskabet N1 has several thousand SF<sub>6</sub>-containing circuit-breakers, and it is not realistic to replace all components by 2030. Therefore, it is planned to offset the remaining emissions from this year.

### Purchases

Every year, Norlys procures goods and assets worth several billion Danish kroner, which emit greenhouse gases during production, transport, installation and use. The continued growth and expansion of networks as well as the charging infrastructure require heavy machinery and procurement of high-carbon footprint materials. Therefore, we prioritise the area through supplier requirements and cooperation, with environmental considerations included as fixed criteria in most major tenders. Due to procurement rules, however, Elnetselskabet N1 can only impose requirements on the subject-matter of the contract, but not requirements that suppliers have targets for reduction of emissions.



## Climate change and circular economy

Norlys recognises the importance of responsible resource consumption and the circular economy and is working on initiatives that support circularity and reduce emissions from extraction, production and disposal of materials. We aim to increase reuse and recycling to reduce the need for virgin materials and reduce waste – for the benefit of the climate and the environment.

Our ambition is to extend the lifetime of materials and products throughout the value chain through responsible sourcing, recyclable materials and equipment, long-lasting design with the possibility of upgrading and efficient waste management. In our policies, we are also committed to reducing waste, maximising recycling, promoting circular principles and adhering to waste management legislation.

All business areas play an important role in the transition to the circular economy, and we will promote circularity principles to help us reduce our emissions and achieve our climate goals.

### Our work on responsible resource consumption and circular economy

At Norlys, we actively work to promote circular use of materials and create financial value through our activities.

In 2025, we worked with specific measures:

- Mapping and collection of waste data across the companies to clarify the most important areas and prioritise strategic initiatives going forward to promote circularity, reduce climate footprint and support climate goals.
- Updating policies and integrating guidelines for resources, waste management and recycling. Further measures and deployment are expected

to be implemented in 2026.

- Streamlining the use of IT equipment in Norlys through reuse and recycling both at the sites and in relation to our workforce, such as refurbishment of IT equipment, donation of used equipment, life cycle assessments and employee motivation to choose recycled products, e.g. work phones.

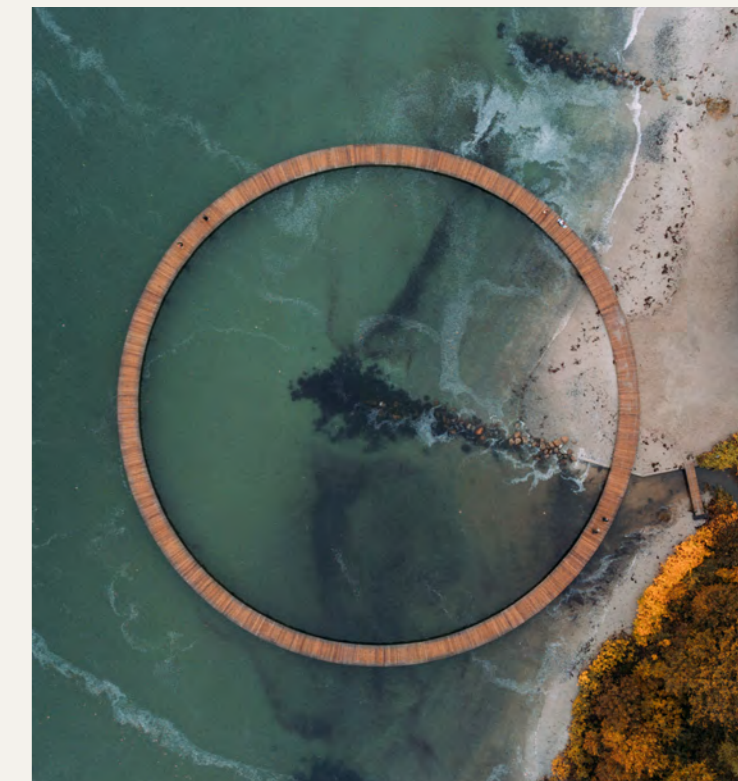
Kundeselskabet has established several circular pathways for products and services for both private and business customers, including:

- Takeback and refurbishment schemes for mobile phones, routers, coax and 5G equipment and charging stations, including through the concepts of Byt til Nyt and Pre-loved, which will encourage more people to send their used devices for recycling. Byt til Nyt breathes new life into old devices by recycling the products or equipment. When the devices are recycled, they are sold to third parties, who renovate them and make them available on the market again, or they are used to repair old devices or manufacture new ones. Pre-loved extends the life of mobile phones and other equipment by checking, preparing and recycling the products through renovation, which are then offered to customers. The same solution for charging boxes is offered to customers which they can actively opt into.
- The concepts of Internet of Things (IoT) and Crowd Insights, which build on data-driven insights and help increase efficiency in business and society. The IoT platform supports intelligent building monitoring, fleet control and waste management, which can thus help reduce energy consumption and environmental impact. Crowd Insights ensures better planning of activities and infrastructure development by analysing actual trends and needs and avoiding unnecessary construction, for example by predicting the traffic flow of the future.

These initiatives offer solutions that ensure better use of the planet's resources and reduce emissions. Refurbishment arrangements for telecommunications in Kundeselskabet, including customers' internet equipment, are expected to amount to 25% in the coming year, supported by optimised logistics through partnerships. All schemes also guarantee complete data security.

In 2026, we will upgrade our competences in this area. In addition, we want greater insight into the financial opportunities of the circular economy that contribute to ESG as a business case.

Norlys also expects to be able to report in this area in accordance with ESRS E5 from 2026.



## Climate change and biodiversity

Norlys recognises that biodiversity is in crisis – both globally and in Denmark – and that this has an impact on how we do business. We work using a holistic approach to ESG and recognise the strong link between biodiversity and climate change. Well-functioning ecosystems can mitigate climate change through carbon sequestration and water and temperature regulation and are essential to achieving climate goals. Failure to take action can create a downward spiral of cascading impacts.

We have mapped biodiversity-related impacts and dependencies with regard to our activities. The biggest impacts derive from emissions, resource utilisation and waste, while we rely on nature’s ability to stabilise the climate and store CO<sub>2</sub>. This helps regulate and stabilise temperatures, weather patterns, and extreme weather conditions, and therefore mitigate climate risks. Our policies support continuous improvement of biodiversity and sets targets for biodiversity on existing land, new land and in forest areas.

Although biodiversity has not been identified as a material impact, Norlys wants to continuously strengthen its efforts and integrate the principles in our operational activities to avoid, minimise and mitigate impacts.

### Our work with biodiversity

We have a responsibility to create a positive change on our own land and minimise the impact in our own operations and the value chain. For activities not on our own land, we have a restoration obligation and will improve biodiversity where possible. The implementation of biodiversity promotion measures also reduces climate

risks and stores greenhouse gases.

We have an ambition to improve biodiversity and are therefore investigating how new activities affect nature – the greater the impact, the greater the consideration. The efforts are concentrated on larger, connected land where we can make a real difference, especially on the land around Gudenaacentralen.

Historically, Norlys’ forests have been plantation forest without regard to biodiversity, but Norlys is continuously implementing biodiversity-promoting initiatives. At Karlsgårde Vandkraft A/S (hereinafter “Karlsgårde”) and Gudenaacentralen, we are converting parts of the forest into oak, beech and other hardwoods and varied species compositions to create more habitats. The forest is continuously renewed and approximately one hectare is being thinned to create a more varied forest. We plan to establish up to 10 hectares of new forest by 2026 and a total of 65 hectares over five years. The measures also include natural regeneration, planting hedgerows consisting of shrubs and fruit-bearing trees, designating a larger area as undisturbed forest and securing open, protected areas. All forests are PEFC certified, meaning that a certain amount of timber must be left in the forest after harvesting.

Elnetselskabet N1 has land around its transformer substations, of which only part is used for substations. Nearly half of the land outside the substations is now used for agriculture. We are aiming for more nature-friendly management, so there are plans to prepare a strategy for biodiversity in the company in 2026.



# Energy consumption and mix

E1-7

The energy consumption and mix provide an overview of where Norlys' energy comes from, including the proportion of fossil fuels, nuclear power and renewable energy. In 2025, renewable energy accounted for 86% of Norlys' total energy consumption, an increase of three percentage points compared to 2024. Fossil fuels accounted for 12%, while the remaining 2% came from nuclear power. The primary energy source is the purchase of power, heat and steam based on renewable energy sources. This development is underlined by the fact that fossil fuel consumption has decreased by 16%, while renewable energy consumption has increased by 3%.

Category	Unit	2025	2024	Percentage change
<b>Fossil fuels:</b>				
Coal	MWh	0	0	
Diesel and petrol	MWh	13,906	13,740	1%
Natural gas	MWh	1,011	1,064	-5%
Other fossil fuels (diesel oil/heating oil)	MWh	350	355	-1%
Purchased electricity, heat, steam from fossil sources	MWh	50,312	62,739	-20%
<b>Total fossil fuels</b>	MWh	<b>65,579</b>	<b>77,898</b>	<b>-16%</b>
<b>Nuclear power</b>	MWh	<b>12,088</b>	<b>13,277</b>	<b>-9%</b>
<b>Renewable energy (RE)</b>				
Biomass	MWh	41	15	176 %
Purchased power, heat, steam from RE	MWh	449,116	430,303	4%
Self-generated RE	MWh	247	146	69 %
Self-generated sold RE	MWh	11,947	17,196	-31%
<b>Total RE</b>	MWh	<b>461,351</b>	<b>447,660</b>	<b>3%</b>
<b>Total energy consumption including nuclear power</b>	MWh	<b>539,018</b>	<b>538,835</b>	<b>0%</b>
<b>Share of fossil fuels</b>	%	12%	14%	
<b>Share of nuclear power</b>	%	2%	2%	
<b>Share of RE</b>	%	86%	83%	



### Accounting policies

Norlys calculates energy consumption as the actual consumption in its own activities and presents it in megawatt-hours (MWh). The calculation is based on the lower heating value in order to guarantee a uniform and accurate calculation. The calculation includes fuel consumption at the Group's locations, in own and leased vehicles as well as self-generated and purchased energy for operations (electricity, heating and cooling). Energy consumption is not reduced by the sale of energy to third parties.

For electricity, contractual agreements on green electricity are taken into account. Documentation of renewable energy is provided through guarantees of origin, power purchase agreements (PPAs) and renewable energy certificates (RECs). For sources without green certificates, distribution of production sources from DK1 and DK2 and IEA is used when there is no defined location for consumption. Self-generated energy from solar cells on our own buildings is included in the calculation but is only included once to avoid double counting.

### Change of methodology:

Starting with this report, the category "Self-generated sold RE" has been added to the statement, and the figures for 2024 have been adjusted in accordance with the new method. In addition, the methodology for calculating electricity consumption for electric cars has been changed, so that the consumption is now distributed according to an updated production source distribution.

# Climate impact

E1-8

## Carbon accounting

Norlys' total GHG emissions is reduced by 12% according to the location-based methodology and 11% according to the market-based methodology from the financial year 2024 to 2025. The primary reason for the reduction is that electricity in Denmark comes more from renewable energy sources than previously. This has a significant impact on the reductions in the energy-related Scope 3 categories for fuel and energy-related activities (3) and the use of sold products (11) and are passive reductions that Norlys does not directly affect. In addition, at the beginning of 2025, Norlys completed a large building, a new domicile in Aalborg, causing a significant reduction in emissions in the capital goods category (2) compared to 2024, when the construction had a significant impact. Overall reductions were achieved despite increases in some areas, with the most significant emissions being related to the purchased goods and services category (1), which increased as a result of more purchases in 2025. This is partly due to a large procurement of charging stations. Of the total emissions for Scope 3, 35% comes from primary data.

## Emission intensity

Emission intensity decreased from 84 to 65 tCO<sub>2</sub>e relative to net revenue from 2024 to 2025. This corresponds to a 23% decrease and is due to an increase in Norlys' net revenue, while Norlys' total GHG emissions have declined. Revenue in 2025 was DKK 16,251 million, see [Annual Report for 2025, Note 3](#).

The emission intensity is calculated by dividing the total greenhouse gas emissions (tCO<sub>2</sub>e), using the location-based methodology, by net revenue (DKK million).

## Norlys' most significant emissions

Norlys' primary business areas focus on energy-related activities. This is reflected in our emissions, as shown in

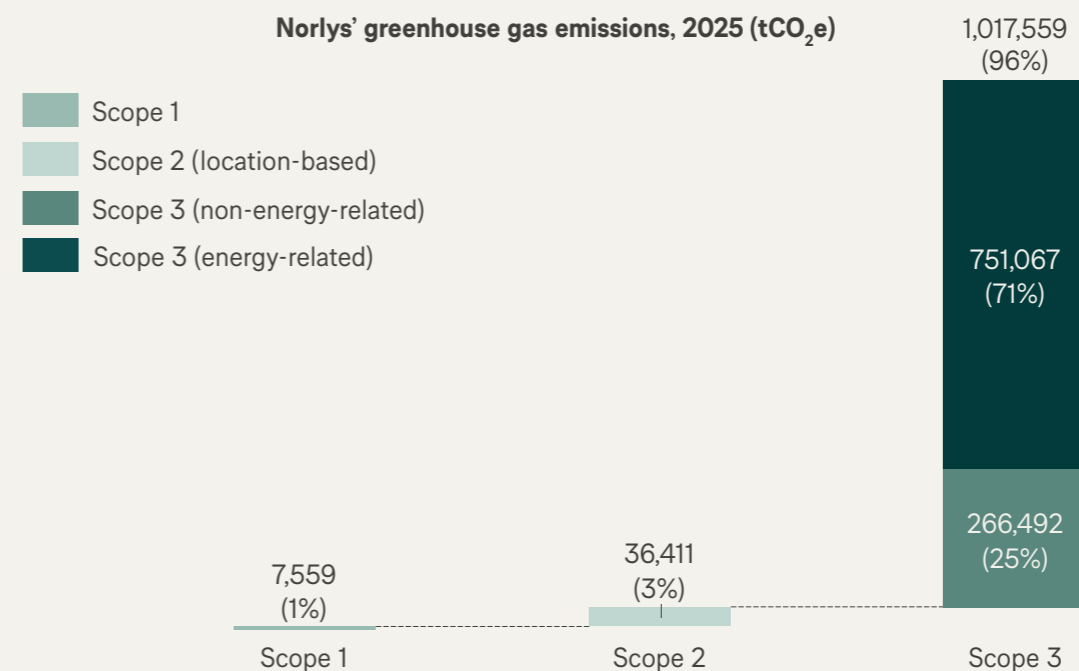
the model to the right. The model distinguishes between different types of energy-related emissions to better illustrate their origin.

Category 3 and 11, which cover energy-related emissions, are the most striking. This reflects one of Norlys' business activities, which includes the supply of energy-related critical infrastructure and sales.

- **Category 1:** Emissions from all purchased goods and services (OpEx) that are not included in other categories (e.g., consulting services, office cleaning).
- **Category 2:** All capital costs (CapEx), i.e. larger investments recorded on the balance sheet.
- **Category 3:** Upstream emissions from energy extraction, processing and distribution (Scope 1 and 2) and electricity sold to customers. Sold electricity is the largest source of emissions in this category.
- **Category 11:** Gas sold to customers and emissions from sold products throughout the lifetime of the product (e.g. routers and stand-by consumption from EV charging stations). Sold gas is the largest source of emissions in this category.



Absolute gross greenhouse gas (GHG) emissions in tCO <sub>2</sub> e	2025	2024 (base year)	Percentage change
<b>Scope 1 GHG emissions</b>			
Scope 1 GHG emissions	7,559	7,184	5%
<b>Scope 2 GHG emissions</b>			
Scope 2 GHG emissions (location-based)	36,411	46,153	-21%
Scope 2 GHG emissions (market-based)	182,763	201,501	-9%
<b>Significant Scope 3 GHG emissions</b>			
Category 1: Purchased goods and services	172,728	152,173	14%
Category 2: Capital goods	67,580	86,601	-22%
Category 3: Fuel- and energy-related activities	407,605	503,222	-19%
Category 11: Use of sold products	343,462	386,184	-11%
Category 15: Investments	26,184	23,117	13%
Total Scope 3 GHG emissions	1,017,559	1,151,297	-12%
<b>Total GHG emissions</b>			
Total GHG emissions (location-based)	1,061,529	1,204,634	-12%
Total GHG emissions (market-based)	1,207,881	1,359,982	-11%



## Scope 1 and 2 emission sources

The tables show gross greenhouse gas emissions broken down into Scope 1 and Scope 2. They contain both consumption figures and calculated emissions for the individual sources as well as comparison between two reporting years. The purpose is to provide a clear overview of where emissions originate from and how they develop over time.

### Scope 1

The two largest emission sources in Scope 1 are transport and fuel oil (diesel and petrol), which accounts for 47% of Scope 1, and chemical process (SF<sub>6</sub> gas), which accounts for 50%. Despite a lower number of cars and vans running on fossil fuels, emissions have increased by 1%. This is due to more kilometres being covered by the remaining vehicles. At the same time, emissions from SF<sub>6</sub> gas have increased by 10% because of more leaks – something we are actively working to reduce, but which is expected to vary from year to year.

### Scope 2

Norlys' total Scope 2 emissions decreased from 2024 to 2025 despite increasing MWh consumption. The largest emissions stem from the grid loss, which constitutes 88% of Scope 2 in the location-based methodology. Consumption related to grid loss increased by 1.5%, but emissions decreased by 21% according to the location-based methodology. This is primarily due to the fact that the Danish electricity grid uses more renewable energy sources. The biggest change is seen in the market-based calculation for buildings, which fell by 50% due to a significant purchase of green certificates.

## Biogenic emissions

The biogenic emissions from biomass combustion or decomposition not included in Scope 1 and Scope 2 greenhouse gas emissions were 323 CO<sub>2</sub>e and 25,537 tCO<sub>2</sub>e respectively. The biogenic emissions not included in Scope 3 greenhouse gas emissions amounted to 470,411 tonnes of CO<sub>2</sub>e in 2025.

Scope 1 emission source	Unit	Consumption 2025	Consumption 2024	Emissions (tCO <sub>2</sub> e) 2025	Emissions (tCO <sub>2</sub> e) 2024	Percentage change Emissions
Transport and fuel oil	L	1,444,023	1,429,865	3,586	3,543	1%
Stationary combustion	MWh	1,088	1,111	115	125	-8%
Chemical process	kg	156	142	3,793	3,440	10%
Refrigerants	kg	68	69	65	76	-14%
<b>Scope 1 total</b>				<b>7,559</b>	<b>7,184</b>	<b>5%</b>

Scope 2 emission source in MWh	Consumption 2025	Consumption 2024	Location-based (tCO <sub>2</sub> e) 2025	Location-based (tCO <sub>2</sub> e) 2024	Percentage change	Market-based (tCO <sub>2</sub> e) 2025	Market-based (tCO <sub>2</sub> e) 2024	Percentage change, market-based
Electricity consumption, transport	3,188	2,591	199	258	-23%	1,101	1,510	-27%
Electricity consumption, buildings	26,810	27,034	1,754	2,035	-14%	749	1,493	-50%
Electricity consumption, infrastructure	26,022	27,419	2,109	2,852	-26%	2,965	3,302	-10%
Grid loss	451,155	444,583	32,040	40,596	-21%	177,639	194,783	-9%
District heating	4,588	5,082	309	413	-25%	309	413	-25%
<b>Scope 2 total</b>	<b>511,763</b>	<b>506,710</b>	<b>36,411</b>	<b>46,153</b>	<b>-21%</b>	<b>182,763</b>	<b>201,501</b>	<b>-9%</b>

For the explanation of the method, see the [accounting policies](#) for Scope 1 and 2.

Biogenic emissions in tCO <sub>2</sub> e	2025	2024
Out of scope – Scope 1	323	274
Out of scope – Scope 2	25,537	33,201
Out of scope – Scope 3	470,411	572,559
<b>Out of scope – Total</b>	<b>496,271</b>	<b>606,034</b>

### Accounting policies

Biogenic emissions cover greenhouse gases that are considered CO<sub>2</sub>neutral by the GHG Protocol. Emissions are therefore calculated separately from the overall basis for Scope 1, 2 and 3 emissions. For Scope 1 and Scope 2, biogenic emissions (CO<sub>2</sub>, N<sub>2</sub>O and CH<sub>4</sub>) are calculated based on the consumption of biogenic fuel for own transport as well as the direct use of bio-based fuels. The calculation is made using emission factors from DEFRA.

Scope 3 biogenic emissions are calculated in accordance with the relevant accounting principles from the other sections concerning Scope 3 using biogenic CO<sub>2</sub>factors from DEFRA.

## Accounting policies

### Purpose and accounting policies

The accounting policies were prepared in accordance with the CSRD, ESRS and the GHG Protocol.

They describe methods and principles for calculating and reporting Scope 1, 2 and 3 emissions and ensure consistency, transparency and comparability.

The calculations follow the GHG Protocol, cover the entire Norlys Group and are based on the consolidation approach ‘operational control’. Recalculation is performed if changes exceed 5% compared to the specified base year. Norlys’ activities are not covered by the EU’s greenhouse gas emissions trading system (EU ETS) or other regulated emissions trading systems. All calculated Scope 1 emissions are therefore not regulated under such schemes. All 15 categories in Scope 3 are assessed annually.

### Methods and calculation principles

The methods include activity-based and spend-based calculations with reference to the international standards from DEFRA based on the suppliers’ relevant industry codes. Spend-based estimates are adjusted in relation to inflation and other relevant conditions. Most of Norlys’ emissions come from sold energy (electricity and gas), calculated from activity data.

#### Hierarchy for data sources:

- 1) Supplier-specific data (PCF/EPD),
- 2) Industry average,
- 3) Spend-based methods.

### Delimitation and company structure

Norlys is considered not to have operationally controlled joint ventures or subsidiaries that are not consolidated in the reporting. No changes from 2024 were found in included units under the operational control

method. Norlys reviews its legal situation annually to ensure completeness and compliance with the CSRD requirements.

GHG emissions are calculated using conversion factors for energy consumption and other greenhouse gases.

Only spend-based calculations are used for Norlys’ minor subsidiaries. Industry-specific methods can be included if they do not conflict with general principles and are considered more accurate.

### Recalculation of the base year 2024

In the preparation of carbon accounting for 2025, the base year 2024 was recalculated because of significant changes in the data basis, updated internal guidelines for Scope 3 categories and the transition from European to recently published Danish emission factors in the energy area. These changes result in a higher degree of precision and consistency in the statements – including for the company’s electricity activities – and at the same time strengthen comparability over time. This primarily affects category 3, category 11 and category 15 in Scope 3.

In addition, the data basis has been improved across the organisation, and the data quality has been significantly higher. These improvements have made it necessary to update the 2024 base year so that the reporting reflects the best available knowledge.

### Scope 1 + 2

Scope 1 covers all direct emissions from own activities, including fuel consumption in vehicles, stationary combustion of natural gas as well as emissions from refrigerants and SF<sub>6</sub> in the electricity grid. Data is primarily collected from internal systems and suppliers. Emissions are calculated by multiplying energy

consumption by relevant DEFRA emission factors. If data is missing, extrapolation is performed based on historical consumption patterns.

Scope 2 covers indirect emissions from purchased electricity, electricity loss from the electricity grid, heat and steam to Norlys’ buildings, data centres and operations. Consumption data is obtained from energy suppliers, landlords and the eloverblik.dk portal, and if information is missing, estimates based on the heated surface area or previous years’ consumption are used. Emissions are calculated as both location-based and market-based. Location-based calculations are based on country-specific emission factors from Energinet (DK1/DK2), while market-based calculations are adjusted for the purchase of green certificates and PPAs. Uncertainties are associated with extrapolation of data.

### Scope 3

Emissions arising in the value chain include the sum of CO<sub>2</sub>, CH<sub>4</sub> and SF<sub>6</sub>, converted into CO<sub>2</sub> equivalents. Norlys is considered to only have significant activities in five of the 15 categories in the GHG Protocol. Category 4 (Upstream transportation and distribution), category 5 (Waste), category 6 (Business travel), category 7 (Employee commuting), category 8 (Upstream leased assets), category 9 (Downstream transportation and distribution), category 10 (Processing of sold products), category 12 (End-of-life treatment of sold products), category 13 (Downstream leased assets) and category 14 (Franchises) are therefore omitted from the statement as they are not considered relevant for the Group

No activities in categories 10 and 14 were identified, and for the other omitted categories (4, 5, 6, 7, 8, 9, 12 and 13), each category represents less than 1% of total emissions and is thus not significant. All categories that individually

represent 1% or more of the Group’s total emissions are included in the statement

### Scope 1 Purchased goods and services

Emissions from purchased goods and services are primarily based on financial data and calculated using the spend-based method. In addition, supplier data and emissions from the manufacture of sold equipment calculated using PCFs and EPDs are used.

### Category 2 Capital goods

Emissions from capital goods are primarily calculated from financial data using the spend-based method. In addition, LCAs or EPDs were obtained where possible, including in connection with major construction projects. The placement of emissions in category 1 and category 2 is based on financial accounts and includes some uncertainty.

### Category 3 Fuel- and energy-related activities

Includes Well-to-Tank emissions from own direct and indirect emissions, transmission and distribution losses, and resale of electricity to end-users. The calculations use DEFRA factors and Energinet’s loss rates to ensure accurate estimates. Emissions from electricity purchased and sold to end-users are calculated based on the amount of electricity sold per price zone and emission factors from Energinet’s latest environmental declaration.

### Category 11 Use of sold products

Includes emissions associated with electricity consumption from sold equipment and emissions from sold gas. It is based on the activity-based method considering the equipment’s average lifetime, electricity consumption and on time. Emission factors from Energinet are used in the calculations.

The calculations include WtT emissions. In accordance with the TELCO industry’s recommendations, customer premises equipment (e.g. routers and ONTs) is included in category 11 rather than in category 13 as leased assets. For methodological consistency, leased wall boxes are also included in category 11.

### Category 15 Investments

Emissions are calculated on the basis of Norlys’ ownership interest in associated companies and other significant financial investments. The calculation is based on ownership interest, financial data and emission factors. For companies without published figures, emissions are estimated based on their latest turnover and spend-based emission factors from DEFRA.

### Annual percentage reduction target (base year)

The annual reduction target sets out the average percentage emission reduction per year needed to achieve the 2030 and 2040 targets. The calculation is made according to the following formula:

$$\text{Årlig reduktion} = 1 - \frac{\text{Emissioner i målår}}{\text{Emissioner i basisår}} + (\text{Målår} - \text{Basisår})$$

### Total greenhouse gas emissions

The total greenhouse gas emissions are calculated as the sum of Scope 1, Scope 2 and Scope 3. Reporting uses a location-based method for Scope 2 and a market-based method.

### Update and continuous improvement

Accounting policies are revised annually to reflect new data, methodological improvements and changes in standards. A data quality improvement plan is implemented to reduce uncertainty over time.

# GHG removals and GHG mitigation projects financed through carbon credits

E1-9

Norlys owns forests that continued to absorb CO<sub>2</sub> in 2025. The Gudenaacentralen facility's forest areas comprise about 268 hectares of protected forest established on former agricultural land. In 2025, an additional 19 hectares of forest and 28 hectares of agricultural land were purchased. In 2026, 10 hectares of new forest are expected, as well as the purchase of an additional approx. 35 hectares of agricultural land for afforestation in 2027-2028. Norlys also owns 237 hectares of land near Karlsgårde, of which 76 hectares are forested.

We separately account for the CO<sub>2</sub>e removal in Norlys' forests, but this is not currently included in our carbon accounting.

Norlys-owned forests recorded a net removal of 1,961 tonnes of CO<sub>2</sub>e in 2025. This comes from a gross removal of 2,953 tonnes of CO<sub>2</sub>e, of which 992 tonnes of CO<sub>2</sub>e are due to timber harvesting. The remainder is the net removal.

We recognise that the removal from forests implicitly entails a risk of non-permanence, e.g. in the event of fire, disease or storm damage, and we gradually counteract this risk by making the forest more varied and resilient.

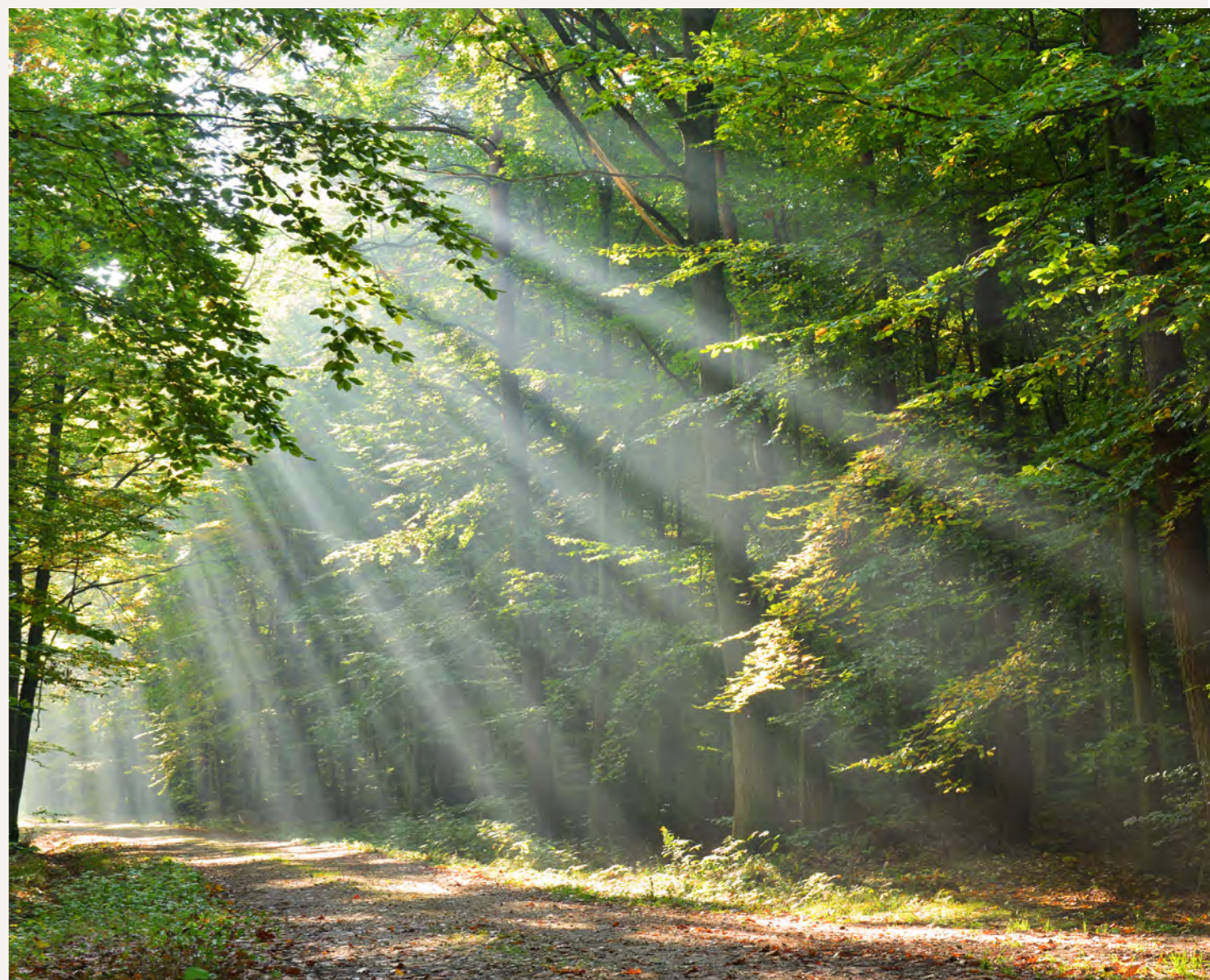
### Carbon credits and guarantees of origin

Norlys prioritises the reduction of actual emissions to achieve our climate neutrality target by the end of 2040. In some cases, however, emissions will be technologically or economically impossible to remove, and it may therefore be necessary to use recognised third-party verified carbon credits to neutralise the last Scope 3 emissions.

Norlys' core business did not use carbon credits in 2025. However, with a view to climate neutrality in Scope 2, Kundeselskabet, Sinal and Group are fully covered by guarantees of origin for all electricity

consumption, except for the consumption from electric cars, as this is an obligation in several commercial contracts. In future, Norlys will make use of offsetting from its own forests as a contribution to achieving our climate goals for 2030.

In 2025, OpenNet purchased guarantees of origin via its supplier to neutralise energy consumption from leases and hosting. It is adjusted annually so that the guarantees of origin correspond to the estimated consumption. Norlys plans to use recognised and third-party verified carbon credits as a supplement to reach our climate targets, but a concrete plan has yet to be adopted. Norlys aims to be climate neutral across the value chain by 2040, according to the targets in sections E1-6, of which active and passive reductions will account for at least 90% of the necessary reductions, while the remaining up to 10% can be covered using carbon credits.



tCO <sub>2</sub> e removal	2025	2024
tCO <sub>2</sub> e credits	0	0
tCO <sub>2</sub> e removal from our own forests	1,961	987
Total removed CO <sub>2</sub> e	1,961	987

### Accounting policies

This is the first time that Norlys is estimating CO<sub>2</sub>e removal for the forest areas at Karlsgårde. These are included in the figures for both 2024 and 2025. In addition, the calculations for forest areas at Gudenaacentralen have been recalculated for the same year, which means that the figure has been revised upwards from 554 to 987 tonnes of CO<sub>2</sub>e for 2024.

The CO<sub>2</sub>e calculations are based on estimates. Tree growth is calculated from average growth models. Felling includes the wood sold, while the wood stock (woody biomass) is calculated as the total volume, including stumps, branches and tops. The CO<sub>2</sub>e removal is calculated by an external company according to the biomass model developed by the University of Copenhagen. This model is also used in the official Danish forestry statistics (NFI).

Simplification: All coniferous wood is counted as red fir and all deciduous wood as beech.

# Social

## Highlights 2025



### An attractive workplace

In 2025, Norlys moved up nine places and is now among the top 15 most attractive jobs for highly educated people, according to Universum. We appreciate this recognition, as Norlys is committed to creating a workplace with flexible arrangements and a meaningful purpose that employees want to contribute to.



### Support for the Danish Reserve Force

In 2025, Norlys became an official support company of Interforce and will in future give employees affiliated with the Danish Reserve Force up to five days off with pay annually for training and service. The initiative supports Denmark's preparedness and recognises employees who contribute their competences to the armed forces.



### Accidents at work

The number of lost-time injuries fell from 46 in 2024 to 42 in 2025. This is despite the fact that the number of employees in the Group increased by almost 200. The trend continues from last year, when the number of accidents was reduced by seven compared to 2023.



### A safe environment in difficult life situations

In 2025, Norlys introduced compassionate leave for employees who lose a child. The scheme provides full pay for three months and then the possibility of an additional three months off with maternity/paternity benefits. The intention is to create a safe environment and space to process the loss.



### Diversity as a strength

Norlys achieved a 50/50 gender balance in the Group Executive Board and among CEOs in the core business, and in 2025 Norlys signed up to the Diversity Pact of the Danish Chamber of Commerce and the Diversity Pledge of the Confederation of Danish Industry to strengthen diversity and inclusion across the Group. Several measures have been launched to ensure continued progress



### Strengthened efforts against smishing

Many Danes are exposed to fake SMS text messages, also known as smishing, with fraudsters pretending to be a company to lure credit card information out of the victim. At Norlys, we have strengthened our efforts and up-qualified our cyber security skills to protect both customers and our brand even better in the future.

# Own workforce

S1

Norlys wants to be among the best workplaces in Denmark. We are therefore committed to creating the best framework for our employees, where everyone can be themselves and go to work safely.

As an employer, we take responsibility for the well-being of our employees and give high priority to flexibility and employee input, as we believe that this helps to make the workplace more attractive.

Our more than 4,650 employees are key to our success and support our many business areas with a wide range of competences. All employee groups play a significant role in realising our strategic priorities and living our values.

We actively manage the risks and impacts of our business activities in line with our purpose and values. Our ambition is to ensure that employees thrive at work by providing a safe and inspiring workplace with space for everyone. Good working conditions are therefore a strategic priority in Norlys and an integral part of our strategy. This strengthens our ability to attract and retain skilled employees while creating a good working life characterised by engagement, well-being and job satisfaction. In addition, our work on diversity and inclusion as well as health and safety is given high priority. The following sections for our own workforce are broken down into these topics and are underpinned by our commitments to respecting human rights.



## Norlys' material impacts, risks and opportunities

### Diversity, equal treatment and inclusion

#### Strategy and business model:

Norlys works strategically to ensure diversity and inclusion. The risk is not associated with Norlys' business model, but may have an impact on the business.

#### Diversity, equal treatment and inclusion: R

There is a risk that lack of diversity and inclusion can lead to an inability to attract and retain employees. This may mean that Norlys cannot retain and recruit the workforce it needs and increase the risk of weakening Norlys' innovation, creativity and competitiveness

Time horizon: Medium



### Health and safety

#### Strategy and business model:

Norlys' business model is based on the delivery of infrastructure, including the electricity grid, fibre network, coax, EV charging networks and mobile networks. This involves potentially risky work. For this reason, we have a well-established health and safety organisation that works strategically to reduce these effects.

#### Health and safety risks: I

Some of Norlys' employees perform tasks related to electricity, coax, mobile and fibre networks as well as warehouse and canteen jobs. Working at or near excavations, technical installations, large machinery, electricity and high voltage can be risky without the right safety measures and can potentially have a negative impact on these employee groups.

Time horizon: Independent



#### Abbreviations

- I Impact
- R Risk
- O Opportunity
- + Positive
- Negative
- F Actual
- P Potential
- E Own operation
- VC Value chain

# A good working life

## Policies related to good working conditions

S1-1

At Norlys, we have a number of policies that determine how we create an attractive workplace with good working conditions. This has been outlined in the Policy for good working life in own workforce, which describes our commitments to Norlys employees.

To ensure good working conditions, Norlys also offers a wide range of employee benefits, which are described in the companies' employee handbook. Here you will also find further information about employment conditions, guidelines and practical conditions such as leave, pension, illness and holiday. The Norlys employee handbook applies to the entire core business, while the other subsidiaries have separate handbooks for their employees.

The Policy for good working life in own workforce is available both externally on [norlys.dk](http://norlys.dk) and internally on the intranet, while employee handbooks are only available internally.

### Policy for good working life in own workforce

At Norlys, we take our social responsibility seriously and want to create positive change for employees through strong, attractive and inclusive working communities. We are therefore committed to ensuring the best possible framework for employees' working lives based on their interests. The Policy for good working life in

own workforce describes the guidelines, the purpose of which is to promote the best possible conditions for Norlys employees – both now and in the future. The policy guides our day-to-day work and is based on the ambition to create an attractive workplace, ensure equal treatment, diversity and inclusion and respect general rights under labour and human rights. We want a workplace with high standards of well-being, good conditions and room for development through:

- Secure employment conditions.
- Compliance with working time rules and guidelines.
- Responsible and fair remuneration regardless of gender and background.
- Good dialogue between managers and employees.
- A flexible working life.
- Equal treatment, inclusion and diversity.
- Health and safety.
- Employee training and skills development.

**Diversity and inclusion** and **health and safety** are identified as significant areas in the double materiality assessment and are therefore treated separately. The policy is anchored in Norlys Group Culture & Leadership, which is responsible for continuous updating and improvements. It is the individual managers' responsibility to make the employees aware of

the existence of the policy and ensure compliance with the policy. Employees in the companies' Cooperation Committees were involved in drawing up the Policy for good working life in own workforce, and they are also informed of any updates and changes.

The Danish workforce is covered by the Danish Salaried Employees Act, International Labour Organization (ILO) and EU guidelines and collective bargaining agreements (if any). International employees are subject to the laws of the country in question.

The policy covers the majority of employees in Norlys, with the exception of Norlys Energy Trading, which is not formally affiliated, but in practice follows the principles. Compliance with the policy also takes into account the functional separation of Elnetselskabet N1 from the rest of the Group, including the requirement for independent decision-making powers.

Where the contractual relationship is not with Norlys, we require external parties to comply with national legislation and any collective bargaining agreements, respect human rights and follow international guidelines.

We are committed to the ongoing due diligence process and to updating the policy annually or in the event of major changes, for example in legislation.

### Human rights obligations

In Norlys, we respect human rights in all activities across our value chain. We see human rights as fundamental principles to protect people's dignity, freedom and respect – both in our own operations, in cooperation with partners and in the communities we are part of. Our commitments to upholding human rights are described in the Policy for good working life in own workforce, among other things, and are consistent with internationally recognised guidelines, including:

- The United Nations Universal Declaration of Human Rights (1948)
- The United Nations' international declaration of human rights
- The International Labour Organization's (ILO) provisions regarding human rights and decent working conditions
- ILO Declaration on Fundamental Principles and Rights at Work
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- The principles of the UN Global Compact
- The European Union's directives and guidelines

regarding labor rights including the EU Social Charter, the European Convention on Human Rights and the Charter of Fundamental Rights of the European Union.

In addition, the policy addresses human trafficking and child and forced labour. Norlys does not tolerate child labour or forced labour, and we are therefore committed to ensuring that it does not happen in Norlys. We comply with the principles laid down in ILO Convention No. 138 concerning the minimum age for employment and ILO Convention No. 182 concerning the elimination of child labour. We ensure that hazardous work that may affect physical, mental or moral health and safety is prohibited for persons under the age of 18, and Norlys has no employees under the age of 15. We reject forced labour, including human trafficking and slave labour, and sets high demands on suppliers and external partners to comply with legislation and international standards.

The human rights guidelines are also embedded in Norlys' Codes of Conduct, including the Code of Conduct and the Supplier Code of Conduct for employees. Our Codes of Conduct describe how the principles apply to both our own workforce and partners in the value chain. **For more details see under G1.**

## Actions and resources related to creating a decent working life

### S1-3 & S1-14

At Norlys, we live up to our responsibility to create an attractive workplace for our employees. In addition to the commitments described in the Policy for good working life in own workforce, we actively work with a number of initiatives that support well-being and development. We adapt our workflows and business practices to meet the needs and interests of our employees in the context of day-to-day operations, strategic goals and Norlys' continued development. Where companies deviate from cross-organisational measures, this is specifically stated.

#### Flexible arrangements

We offer flexible arrangements for all employees to the extent possible, depending on position, tasks and work area. At Norlys, we believe that the workplace of the future is flexible – both in terms of workplace and working hours. We see flexibility as an opportunity to create a better work-life balance, increase well-being and strengthen employee engagement, including:

- In the core companies, we have abolished the limit on the number of paid days of leave employees can take to care of sick children. The scheme is based on mutual trust and responsibility and ensures that our employees perform better in their jobs and can better balance work and family life.
- In 2025, Norlys became a support company of Interforce and offers up to five extra days of paid time off for training and service to the employees who are part of the Danish Reserve Force.

We are continuously working on new initiatives that improve flexibility – also for those whose tasks cannot be completed from home. We do this, among other things, through

employee involvement and by following trends and best practices in the industry. GreenLab also offers employees two annual care days per child under seven years of age.

#### Leave

At Norlys, we have an open and welcoming approach to the need for long-term absence, and we generally want to meet the employees' wishes, including in connection with:

- Having children: Norlys puts employees in a better position than the Danish Maternity Leave Act (barselsloven), and everyone has at least 16 weeks of paid parental leave – regardless of family configuration. In addition, we pay full pay during pregnancy leave, maternity leave for the mother and paternity leave as well as paid time off for fertility treatment and check-ups during pregnancy.
- Compassionate leave, which was introduced in 2025 to create a safe environment and space to deal with the grief of a child's death. Norlys offers full pay for three months and then the right to leave with maternity/paternity benefits for another three months.
- Other leave if it fits into the work situation and contributes positively to the employees' well-being.

The other subsidiaries follow the legal requirements for maternity and leave, and all employees in the Group are entitled to take family-related leave.

#### Senior scheme

We offer a senior scheme that allows for individual agreements to adapt senior employees' working conditions to changing wishes and needs, e.g. reduced working hours, change of work tasks/job function, gradual tapering and freedom to attend treatments to the extent that this can be

accommodated in day-to-day operations. In addition, extra days off are offered to seniors. The other subsidiaries do not have separate senior schemes but follow general guidelines for seniors.

#### Training and development of employees

In Norlys, we want the market value of employees to increase while they are employed here. Therefore, we focus on employee training and skills development as well as continuous learning and development-oriented tasks. Among other things, this happens through an annual Performance & Development interview focusing on skills development and the alignment of Norlys' ambition and strategy with the employees' level of competence.

#### Management responsibility

We believe that the culture is created jointly by everyone in the organisation, but that leaders have a special role as culture bearers and role models who set the direction, strengthen the community and create the framework for innovation and responsibility so that we can all fulfil our full potential. We ensure this through specific management tools and focus on handling transformation processes and organisational changes with dialogue and support. In 2025, we initiated a leadership development program for managers and managers of managers, which will strengthen the ability to adhere to Norlys' values and management principles across companies, so that a common culture is developed.

Good management is a common driving force that binds Norlys together. It is the manager's responsibility to work closely with the individual employee and use the available arrangements to create ideal working conditions.



Case

## Danish Reserve Force

### Employees affiliated with the Danish Reserve Force will have the flexibility to engage in the armed forces

At Norlys, our accountability transcends our own company. Therefore, it is a natural extension of our social responsibility that in 2025 we became an official support company of Interforce, which is a collaboration that strengthens the bond between the armed forces and the civilian labour market. Strong civil protection and military readiness is crucial for Denmark, and at Norlys we support colleagues who are involved in the armed forces and civil protection.

As a support company, Norlys supports Denmark's defence and civil protection by recognising our colleagues who devote their time and skills at the service of society. Norlys employees associated with the Danish Reserve Force can therefore take up to five days off with pay each year for education and service.

## Targets related to good work conditions

### S1-4

At Norlys, we have set targets to ensure that our efforts effectively support our ambition to create job satisfaction and well-being. We use a permanent employee satisfaction survey, the NOA survey, which provides a solid data basis for understanding employees' experience of working conditions and well-being. The survey is based on a recognised survey conducted by a large number of companies in Denmark, and it thus enables benchmarking and detailed strategic insight for core areas and customised areas for Norlys. It covers, among other things, job satisfaction, engagement, reputation, leadership, collaboration, job content, pay and employment conditions, and learning and development.

In 2025, Norlys scored a total of 74 out of 100, and job satisfaction is thus at the same level as in 2024. Overall, this is a solid result, considering major organisational changes in 2024 and 2025, but we have a clear ambition to bring Norlys back to an even higher level, which we have previously achieved. The job satisfaction survey also has a very high approval rate of 96%, corresponding to 4,013 employees across the entire group.

The results help us identify where to take action to ensure that Norlys is a workplace with high well-being and employee satisfaction. They are actively used to clarify focus areas and strengthen decisions that follow our strategy, values and culture.

## Adequate wages

### S1-9

Norlys' employees must be compensated adequately for their work, and employees who do the same type of work must be paid adequately regardless of gender and background. We aim to be at a market-appropriate level for the total pay package to ensure fair compensation.

All employees in Norlys receive fair compensation that meets applicable national and EU benchmarks on appropriate pay. Every year, a salary review is conducted for all employees to ensure fair and competitive compensation packages. Norlys ensures compliance with Directive 2022/2041 by paying at least any mandatory minimum wages.



# Diversity and inclusion

## Diversity and inclusion policies

S1-1

At Norlys, responsibility towards our own workforce is described in employee policies, which support our approach to managing diversity and inclusion. The policy on equal treatment, gender equality, diversity and inclusion sets out our commitments and positions towards employees – and what we expect of them – as we work together to create a decent workplace. The policy is integrated into the Policy for good working life in own workforce but is treated as a separate topic with specific focus areas and objectives.

The policy is available both externally at [norlys.dk](http://norlys.dk) and internally on the intranet.

### Policy on equal treatment, gender equality, diversity and inclusion

In Norlys, there is room to be yourself. Equal treatment, gender equality, diversity and inclusion are an integral part of our culture, values and way of working. We take responsibility for creating space for differences, promoting innovation by bringing all competences into play and driving positive change through an inclusive, safe and inspiring community. The aim of the policy is to inform our daily work, support good processes and address possible challenges and risks. It serves as a guide for both managers and employees, who together are responsible for creating a space where diversity thrives.

The policy focuses on eliminating discrimination and

promoting equal opportunities and an inclusive culture. We want to be a workplace with room for everyone regardless of gender, age, ethnic background, religion, sexual orientation or special needs. It addresses, among other things:

- Age diversity and different life stages.
- Workplace accommodations for those with special physical and mental needs.
- Gender equality.
- Clear procedures to achieve equal treatment, gender equality, diversity and inclusion.
- Zero tolerance for discrimination, different treatment and abusive behaviour.

We see diversity as a strength that brings different perspectives and ideas into play, and we are committed to bringing equal treatment, diversity and inclusion into all our activities.

The policy is anchored in Norlys Group Culture & Leadership, which is responsible for continuous updating and improvements. It is the individual managers' responsibility to make the employees aware of the existence of the policy and ensure compliance with the policy. Employees in the companies' Cooperation Committees were involved in drawing up the policy, and they are also informed of any updates and changes.

The policy covers all employees of all majority-owned companies. Compliance with the policy also takes into account the functional separation of Elnetselskabet N1 from the rest of the Group, including the requirement for independent decision-making powers.

We are committed to the ongoing due diligence process and to updating the policy at least once a year or in the event of major changes, for example in legislation, or new standards.

**In Norlys, there is room to be yourself. Equal treatment, gender equality, diversity and inclusion are an integral part of our culture.**

## How we ensure diversity and inclusion in Norlys

S1-3

Norlys actively works with management responsibility, inclusive culture and diversity, and gender equality in the workforce to ensure that all employees feel comfortable in their work. We want to create a culture where safe employment conditions promote innovation, responsibility and community while supporting a profitable business.

### Management responsibility

Managers in Norlys play a critical role in developing a diverse and inclusive organisation. Diversity and inclusion are integrated into our management principles and incorporated into both the People Review process and the NOA survey. We address unconscious bias and inclusive leadership because we only succeed when all competences are brought into play. In addition, we have a guide for managers to handle abusive behaviour, which must ensure that employees are heard and that cases are handled correctly.

### Inclusive culture

An inclusive culture is created jointly and requires continuous efforts from everyone in the organisation. In Norlys, we want a working environment where everyone feels welcome, respected and valued. We focus on psychological safety and work closely with employees with special needs to ensure the best possible support.

### Workforce diversity and gender equality

Norlys works strategically with diversity in recruitment, among other things by reducing bias in the process and formulating job advertisements to target a broader field of applicants. We want diversity to be reflected at all levels of the organisation, and we try to build a pipeline of diverse talent. Through our flexible working conditions, we also address age diversity in order to meet needs in different life stages, including family-related leave and senior schemes.

In 2024, Norlys established a Diversity & Inclusion Board with the aim of ensuring that D&I efforts are integrated into our companies' business strategies and operational practices. Norlys Energy Trading also has a special focus on recruiting more women in an industry where men are overrepresented.

### Actions in 2025 and beyond

In 2025, we highlighted diversity and inclusion with the celebration of Pride Week, a new D&I podcast, talks on bias and culture, and articles on the intranet. We signed up to the Diversity Pact from the Danish Chamber of Commerce and the Diversity Pledge from the Confederation of Danish Industry, helping us create more diverse and inclusive workplaces. In addition, we entered

into a collaboration with the EQUALIS think tank, in which Norlys is a case partner for the Diversity Barometer in 2026. This will provide insights to improve our work on equal treatment and inclusion.

In 2025, Mjølner established a gender equality committee focusing on gender distribution as well as gender equality, diversity and inclusion. They have set up an extra room for use as a prayer room, for personal mindfulness and for other activities that contribute to employee well-being and inclusion.

With the Diversity Pact and the Diversity Pledge, we have also committed to continue working with the recommendations for gender equality, diversity and inclusion, setting objectives and developing concrete plans. Going forward, we will also strengthen our efforts to cascade the topics from leadership groups to employees and integrate them into daily life.

We report quarterly on target figures and progress to the Board of Directors of Norlys a.m.b.a, the Executive Board and the Audit and Risk Committees of the core companies, and Norlys' D&I Board ensures that the initiatives are integrated into the companies' business strategies and operational practices.



## The Diversity Pact and the Diversity Pledge

Case

### Norlys has signed up to the Diversity Pact and the Diversity Pledge

Diversity and inclusion are crucial for Norlys' development as a working community and for the quality of our decisions and results. Diversity makes us stronger, and in 2025 Norlys therefore signed up to the Diversity Pact from the Danish Chamber of Commerce and the Diversity Pledge from the Confederation of Danish Industry. These are two broad business initiatives that support Danish companies in creating more diverse and inclusive workplaces – in terms of gender, age, ethnicity, sexuality, functional adaptations and much more.

Working with diversity and inclusion requires focus, action and persistence, and this does not happen by itself. By aligning with the Diversity Pact and the Diversity Pledge, Norlys is committed to creating concrete changes, and we can already see results. Over the past year, we achieved a 50/50 gender balance in the Group Executive Board and among our CEOs in the core business. Meanwhile, the data shows us that more male employees take more child sick days as a result of the initiative involving unlimited child sick days. And to ensure that progress continues, our D&I Board, consisting of CEOs and VPs of People & Culture from core companies and the Group, continuously tracks initiatives, goals and frameworks around the gender balance in Norlys.

## Targets related to diversity and inclusion

### S1-4 & S1-8

To support this ambition, Norlys is working with specific objectives that make it possible to track the effectiveness of our initiatives, prioritise resources and create a clear direction towards the desired results. Taking a data-driven approach, we aim to set ambitious but also realistic goals to ensure progress and follow our strong values. This ensures that we minimise potential negative impacts on diversity and inclusion for our own workforce.

Group-specific targets for diversity and inclusion are set in the Executive Board in collaboration with the VPs. The targets are discussed on an ongoing basis at Core Leadership Team meetings, and our D&I Board follows progress and launches initiatives to ensure that we achieve our targets.

We believe that a diverse employee mix creates a better working environment and strengthens innovation. That is why we want our workforce composition to reflect the demographics of society, including the gender distribution. The policy sets out a general objective for gender equality in management positions in Norlys.

At Norlys we recognise that ensuring diversity in the top management of our companies is a challenge. Our distribution is currently not representative, which poses a risk in terms of attracting talent and representing the demographics and diversity of our customers. Therefore, the topic is a high priority at Norlys.

Norlys also measures inclusiveness through the NOA survey, which provides insight into the culture and

employees' experience of diversity and inclusion. Our goal is to keep the score above 85 out of 100 for all inclusiveness questions as we become a more diverse workplace. In 2025, we achieved a strong result with an average D&I score of 90 out of 100.

The following gender balance objectives have been set for leadership positions in the Group's management team:

Gender distribution in top management	Women, number	Men, number	Percentage of gender with lowest representation	Target of 40% representation of the underrepresented gender
The Board of Directors of Norlys a.m.b.a. and of the core companies	9	34	21%	2031*
Group Executive Board & CEOs of the core companies	3	2	40 %	2030
Managers reporting to Group Executive Board & CEOs of the core companies	10	26	28%	2030
All managers with HR responsibilities	190	387	33%	2030

\*The objective in 2031 is due to the fact that there are board elections for the a.m.b.a. Board of Directors this year.



OpenNet has also set separate targets for diversity and inclusion as part of its strategy to promote an inclusive corporate culture that retains and attracts employees. The strategy contains specific objectives for age, gender and ethnicity distribution, which must be achieved by 2027 at the latest. The age distribution has already been achieved, and the focus is now on gender distribution and ethnicity through recruitment, employer branding and cultural initiatives. The latest NOA survey in OpenNet showed an average score of 96 out of 100 for diversity and inclusion.

#### Accounting policies

The senior management is defined in three levels, cf. the Danish Business Authority's 'Targets and policy on the gender composition of management and related reporting'. The top level is the a.m.b.a. Board of Directors and the Boards of Directors of the core companies, then the Group Executive Board and CEOs of the core companies, and finally managers reporting to the Group Executive Board & CEOs of the core companies – here managers are defined as individuals with HR responsibilities or with a position title Director or higher. For transparency, a statement is also shown for all managers with HR responsibilities. Individuals without managerial responsibility are not included here, regardless of position.

Senior management is calculated as the headcount at the end of the period, and gender is defined based on CPR numbers. As opposed to 2024, the figures were calculated at the end of the period.

Due to a major organisational change that formally came into force on 1 January 2025, the definition of senior management was changed from the 2024 report, where the Boards of Directors of the core companies and CEOs were not included. To avoid inappropriate comparisons, the 2024 figures have not been included. The definition of managers reporting to the Group Executive Board and CEOs has also been clarified to include all managers with HR responsibilities reporting to them as well as employees at Director level or higher without HR responsibilities reporting to the Group Executive Board and CEOs. This is because we want to show the gender distribution among the leaders who have the most influence in the company.

## Room for everyone

### S1-11

In accordance with our policy on equal treatment, gender equality, diversity and inclusion, Norlys is committed to ensuring well-being and creating the best possible conditions for all competences to come into play. This is achieved through workplace accommodations and by removing physical, structural and mental barriers for employees with special needs.

In 2025, 0.54% of Norlys' employees were registered in a flexi-job scheme via the municipality or job centre. In 2024, the share was 0.62%. The calculation is based on known circumstances that the employer must take into account and is measured as the relationship between persons in flexi-jobs and the total number of employees at the end of the period (headcount). No estimation methods are used, and data is collected in accordance with applicable legislation that requires adaptation of working conditions.

## Pay differences

### S1-15

The average pay gap between men and women at Norlys – from the lowest paid employee to the Executive Board – was 6.1% in 2025. The difference has fallen significantly since 2024 as a result of active efforts in those positions and areas where the difference was greater than 5%. However, the difference does reflect a predominance of men in top management positions across the Group. Norlys prepares annual gender-specific salary statistics for comparable job titles, where the differences are smaller than 6.1%.

The CEO pay ratio contributes to increased transparency around the pay gap between senior management and other employees and is at the same level as in 2024.

The remuneration of Norlys' Board of Directors and Executive Board for the financial year ended is published annually in a remuneration report at norlys.dk to ensure transparency. The total remuneration package offered to each member of the Executive Board must always be market-compliant and transparent in relation to national levels. Norlys must be able to attract and retain a competent Executive Board that can achieve the Group's objectives and desired development.

Gender pay gap as a percentage	2025	2024	2023
The difference in gross hourly wages between women and men	6.1%	12.6%	15%

CEO pay ratio	2025	2024	2023
Calculated on the basis of CEO remuneration and the median wage of a Norlys employee	11.2	11.2	16.9

#### Accounting policies

The gender pay gap is calculated as the difference between average gross hourly wages for men and women, expressed as a percentage of men's average gross hourly wages. The calculation covers all employees, including part-time and temporary employees. Gender is defined based on CPR numbers.

The CEO pay ratio is calculated as the ratio between the total annual compensation for the highest paid employee and the median total compensation for all other employees. Compensation includes base salary, cash allowances, bonuses, benefits in kind and long-term incentives for fair value.

No estimates were used for gender pay gap or CEO pay ratio, but data comes from HR systems. Gross salary and total compensation for all employees were prepared from employees with employment conditions at the end of the period.

## Discrimination

S1-16

Discrimination incidents and complaints	Unit	2025	2024
Discrimination incidents and harassment	Number	4	0
Number of other human rights incidents	Number	0	0
Total amount of fines, penalties and compensation	DKK million	0	0

At Norlys, we have zero tolerance for discrimination, different treatment and abusive behaviour, and our goal is thus zero cases or incidents. We work proactively to prevent any form of discrimination through clear policies, management responsibilities and a culture of respect and inclusion. Any reports are handled quickly and correctly via established processes that ensure transparency and fairness.

In 2025, nine enquiries were reported through the whistleblower system. They can be attributed to four overall cases that generated multiple enquiries. If incidents occur outside the whistleblower system, they are handled in accordance with applicable management procedures, but no statistics are kept of these enquiries.

### Accounting policies

The number of discrimination and harassment incidents is calculated as abusive incidents for the person or persons concerned and is an umbrella term for bullying, sexual harassment and other degrading behaviour from persons in the company. Similar actions by customers, users or others are referred to as violence and are not included in the statement. Please note that the information about whistleblower cases does not distinguish cases of discrimination, and the statement therefore contains all the above forms of abusive events.

Other human rights incidents include complaints reported through internal grievance routes for other social and human rights matters (excluding discrimination incidents).

The total amount of fines, penalties and compensation includes amounts due to discrimination events and complaints, as well as a reconciliation of those amounts with the most relevant items in the financial statements. Fines are limited to fines issued by the Danish Working Environment Authority and booked in the accounts

Discrimination incidents and complaints are calculated for internal employees and external parties at a Norlys location on a daily basis. Data is obtained from the whistleblower system for the reporting period. Only verified incidents and legitimate complaints with a completed investigation are included. No estimates are used; only actual recorded events are reported.



## Case

### Norlys and the Red Cross fighting loneliness

Loneliness is one of the biggest challenges in Denmark and affects almost 600,000 people. At Norlys, we believe that community makes a difference – which is why we entered into a three-year partnership with the Red Cross in 2024. The partnership means that each year we donate DKK 1 million to the work to combat loneliness and strengthen meaningful communities.

Our donations contribute to initiatives such as the Red Cross Visiting Service, where volunteers visit lonely citizens, and SnakSammen, which offers online conversations with a volunteer. With one annual donation, up to 1,500 people can participate in the Visiting Service, and 2,700 people can chat in SnakSammen.

# Health and safety

## Policies related to health and safety of own workforce

### S1-1

In Norlys, health and safety procedures are a high priority, as many employees do work that can result in health and safety risks without the proper measures, procedures and guidelines. Norlys' policy on working environment specifies the overall obligations described in the Policy for good working life in own workforce. The purpose of the policy on working environment is to develop and maintain a good physical and psychological working environment where employees thrive and no one gets sick from work. The policy sets out the standard for how we protect and ensure employee well-being as well as our shared responsibility for creating a safe workplace together.

The policy is available both externally at [norlys.dk](http://norlys.dk) and internally on the intranet.

#### Policy on working environment

Norlys seeks to create a proactive health and safety culture with a high level of prevention to ensure employee well-being and avoid work-related injuries and illnesses. Through prevention and concrete objectives, Norlys aims to achieve zero workplace accidents. The guidelines in the policy on working environment focus on:

- Ongoing dialogue between employees and management.
- Improvements in the working environment through community and responsibility.
- A well-functioning health and safety organisation with the right competences.
- Integrating the working environment into actions and agreements.
- Coordination and cooperation between the individual company's health and safety organisation and the line organisation.

- Reporting and evaluation through workplace assessments that identify risks to the physical and psychological working environment.

Norlys follows the Executive Order on the Danish Working Environment Act (Bekendtgørelse af lov om arbejdsmiljø), which is based on international rules and EU directives, including ILO (International Labour Organization) conventions on working environment and safety. These rules set minimum standards for occupational safety and health, protect workers and contribute to a safe and healthy working environment. The policy is also inspired by Vision Zero, which focuses on health, safety and well-being and strives for a health and safety culture with a high level of prevention to support the goal of zero accidents.

The policy on working environment is anchored in the senior management of the individual companies, and they are responsible for continuous updating and improvements. It is the managers' responsibility to make their employees aware of the existence of the policy and ensure compliance with the policy. Employees were involved in formulating the policy through the companies' health and safety organisation, and this also ensures that continuous evaluation and updating of activities and guidelines take place.

The policy covers all employees of all majority-owned companies. Compliance with the policy also takes into account the functional separation of Elnetselskabet N1 from the rest of the Group, including the requirement for independent decision-making powers.

We are committed to the ongoing due diligence process and to updating the policy in the event of major changes, for example in legislation.



## Management system to ensure health and safety at work

S1-1

At Norlys, we use a number of structured procedures based on Vision Zero and management system principles, which are fundamental to our operations and aim to ensure a safe workplace. In addition, the policy on working environment specifies our obligations to create a culture that promotes employee health and safety and prevents risks, including:

- Management involvement in health and safety programmes and resource allocation.
- Prioritising the working environment over productivity.
- Ambitious goals that exceed the law.
- Regular communication and active employee involvement in risk management and prevention.
- Prevention by design to reduce injuries and exposures.
- Reporting is systematised and reviewed regularly.

Norlys also has procedures for reporting accidents as well as processes for internal learning from accidents to avoid repetitions. We measure the number of accidents at work, near misses and suggested improvements and make continuous improvements to the working environment. In addition, we conduct safety training for employees, systematic follow-up and updating of the policy on working environment, objectives and procedures. In this way, we promote efficiency and contribute to ensuring that the same events do not happen again.

Given the type of work being done, the work may be dangerous for some employee groups, and any accidents at work can have serious consequences. In such cases, we follow very clear procedures for handling the accident, and Norlys will always help the employee in the best possible way. The employee is also covered by insurance.

All accidents at work are reported in the EASY system. In the event of lost-time injuries and serious incidents, an accident analysis must also be performed.



## How we create a healthy and safe workplace

S1-3

At Norlys, employee safety is a top priority. We want to be a workplace where it is safe to go to work and where everyone thrives. In addition to safety, we want to create a framework in which employee well-being and health are promoted. Health is about balance, and we recognise that balance looks different for all of us. We must therefore make room for the individual employee to find his or her own path to well-being and job satisfaction through the right measures.

### Safety

The work of reducing the number of accidents and creating a safe and secure workplace is ongoing work, and efforts are continuously being made in this area. In 2025, we implemented, among other things:

- Campaigns focused on safety measures.
- Workplace assessments and safety walkthroughs at project sites and locations and among technicians.
- Update of safety procedures, including the procedure for handling serious accidents and traumatic events.

In addition, Kundeselskabet prepared a health and safety workbook to serve as a reference book and ensure alignment in the processes, and Sinal introduced presentations on working environment and safety aimed at various employee groups, a health and safety café and an emergency preparedness film on evacuation procedures.

Across the companies, we maintain a strong focus on increasing the reporting of near-miss incidents and improvement suggestions, as these contribute to documentation, risk prevention and learning that enhances the working environment.

### Health

Norlys actively works with health and well-being plans to ensure the physical and mental health of its employees. In 2025, there was a general focus on mental health, visibility of health and safety representatives and workplace assessments. In addition, the core business has launched separate initiatives as part of its health strategies to ensure a targeted focus on health and safety, including:

- Lectures, online courses, campaigns and workshops on mental health, good habits, movement and stress management.
- Focus on physical health with healthier diets in the canteens, discount agreements for diet and exercise, health checks, group training and ergonomics.
- Introduction of Norlys Move as a warm-up to the DHL Relay Race with functional training and focus on everyday movement, including walking and running programmes and online counselling with a running coach.
- Social events for employees and their families with a focus on togetherness, balance and community, e.g. communal singing and musical features.
- Management course with workshops and sparring with a psychologist to identify and manage stress and dissatisfaction.

We also collaborate with external specialists, pension companies and health insurance companies, and this forms the basis for our health and well-being initiatives.



## Targets related to health and safety in Norlys

### S1-4

In addition to the target of zero workplace accidents, the policy on working environment sets clear objectives for the work with health and safety. The objectives create a clear direction, ensure prioritisation of resources and support informed decision-making in line with our strategy and guidelines.

The increased focus on the working environment has resulted in a reduction in lost-time injuries. In addition, we want to reduce sick leave among employees.

Across Norlys, we share a common objective of zero workplace accidents – always. In addition, the core companies have set different goals for the working

environment and safety. We continuously measure and evaluate our performance against benchmark targets which are followed up on regularly. The targets are defined in the companies' health and safety organisation in cooperation between top management, health and safety managers and health and safety representatives. Incidents are followed up and actions are agreed separately at the companies' whiteboard meetings.

Sinal	Kundeselskabet	Elnetselskabet NI
<ul style="list-style-type: none"> <li>-40% fewer lost-time injuries compared to the 2023 benchmark.</li> <li>Maximum of eight lost-time trip and fall injuries in 2025.</li> <li>100 near-miss incidents reported in 2025.</li> <li>25 suggested improvements reported in 2025.</li> </ul>	<ul style="list-style-type: none"> <li>Work is ongoing to increase the number of registered near-miss incidents, and a target for this is being prepared.</li> </ul>	<ul style="list-style-type: none"> <li>30% fewer lost-time injuries compared to 2024.</li> <li>110 near-miss incidents reported in 2025.</li> <li>52 suggested improvements reported in 2025.</li> <li>Safety walkthroughs at locations.</li> <li>Drop-off locations and storage facilities every 16 months.</li> <li>60 inspections at stations, project sites and technician field visits in 2025.</li> </ul>

## Health and safety metrics

### S1-13

The number of lost-time injuries fell from 46 in 2024 to 42 in 2025. This is despite the fact that the number of employees in the Group increased by nearly 200 employees. The trend continues from last year, when the number of accidents was reduced by seven compared to 2023. This is emphasised in the incidence figure,

which also confirms a sharpened focus on the working environment and safety. However, it is worth noting that the total number of lost working days has increased considerably, which is due to a few longer periods of absence in the core companies.

Health and safety metrics	Unit	2025	2024
Share of employees covered by health and safety scheme (health insurance), end of period	%	100%	100%
Deaths from work-related injuries and illness	Number	0	0
Work-related lost-time injuries	Number	42	46
Lost-time injuries per 1,000,000 working hours	Incident rate	6.0	6.6
Recordable cases of work-related ill health	Number	<5	<5
Lost time due to work-related accidents and ill health	Days	294	244

#### Accounting policies

All data is based on actual registrations in HR and health and safety systems for the reporting period and applies to Norlys' own workforce.

The percentage of employees covered by the health and safety scheme is calculated as the number of covered employees in relation to the total headcount at the end of the period. The number of deaths and accidents at work is recorded via internal systems, and incidence figures are calculated per 1,000,000 working hours. Lost time is calculated as hours of absence divided by 7.4 (normal working day), excluding weekends and public holidays. Work-related health follows the ILO's list of occupational diseases.

# Processes for engaging with own workforce, remediation and grievance channels

## Involvement of employees and their perspectives

S1-2

Proactive involvement of employees and their representatives is an important element in Norlys' approach to creating good working conditions, promoting diversity and inclusion and ensuring health and safety at work. We have a wide range of processes that ensure employee involvement around actual and potential impacts on our own workforce. By directly involving employees, we collect insights that are used to improve employee satisfaction, prevent poor working conditions, and create a working environment that promotes the well-being of our employees. The insights support decisions and prioritisation of strategic initiatives, and we can resolve issues as they arise. Top management has the overall responsibility for ensuring that the involvement processes are consistent and in line with our values.

### Cooperation Committees

The core companies have separate Cooperation Committees (CC), which are forums for cooperation between management and employees. CCs consist of management and employee representatives and deal with work and personnel matters that are of importance to the workplace. The CCs ensure employees' co-determination through involvement in the development of Norlys and the organisation of day-to-day work. Among other things, the committee is involved in or informed of:

- The company's overall targets and strategies.

- Principles of work and welfare.
- Implementation rationalisations, efficiency measures, organisational changes and adaptations.
- Plans for well-being.
- Equal treatment and safeguarding of employment rights.

Among other things, it is through CCs that the abolition of the cap on days off for a sick child was decided in a collaboration between employees and management. Representatives from CCs also hold joint dialogue meetings across the core business in order to exchange experience.

CCs have not been established in the other subsidiaries.

### Health and safety organisation

The companies' health and safety organisation (HSO) consists of health and safety managers and health and safety representatives, and it represents the interests of employees in the area of working environment and safety. The representatives act as points of contact to address concerns for the wider workforce and cooperate with management to identify risks and improve the working environment. The HSO performs statutory workplace assessments and plans working environment initiatives in collaboration with health and safety groups and relevant disciplines.

### Employee satisfaction surveys

Every year, Norlys conducts the *Norlys job satisfaction survey* (NOA), which allows employees to anonymously share their experience of job satisfaction. The NOA is an important tool to highlight what is important to employees, and the results are used to develop action plans that improve well-being. The survey is thus a good tool to ensure the effectiveness of the many initiatives for our own workforce

In addition to the NOA, Elnetselskabet N1 conducts continuous job satisfaction surveys all year round, Kundeselskabet conducts NOA spot surveys, and Sinal regularly uses SinalPuls to commit managers to ensuring job satisfaction in their team.

### People Reviews

Norlys conducts performance & development interviews, which are a direct dialogue between a manager and an employee about the employee's development and needs, and how we can best support this. The interview forms the basis for ongoing feedback and development plans.

### Dialogue meetings

The core companies hold dialogue meetings in various forms, for example between union representatives and People Partners, between employees and senior

management as well as larger dialogue meetings for the various business areas. We believe in the importance of getting direct insights and perspectives from our own workforce as it supports our entire business, values and mission statement.

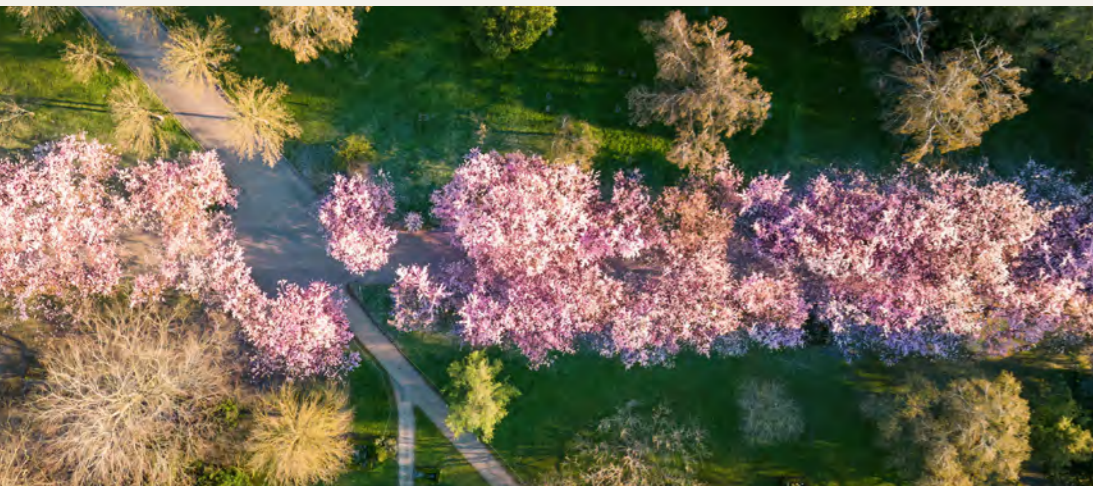
### Employee representation on the Board of Directors of Norlys a.m.b.a.

The Board of Directors of Norlys a.m.b.a. consists of members elected by and from among the Board of Representatives from each of the 15 electoral areas. In addition, the Board of Directors consists of four employee-elected members who, through their representation, must ensure the dissemination and alignment of the employees' and top management's interests and involve them in the decisions.



## Insights into perspectives from marginalised employee groups

At Norlys, all employees are treated equally, and everyone has access to all the same channels – including particularly vulnerable and marginalised groups. To ensure that everyone feels heard and included, we therefore also include specific questions about diversity and inclusion in the NOA survey.



## Complaint channels and mechanisms for our own workforce

In addition to the involvement processes, Norlys has established several channels that enable employees to raise concerns about problematic conditions, inappropriate behaviour or violations of internal guidelines. We want a high-trust culture where employees speak out openly without any risk of retaliation – including about complaints related to employee conditions.

We encourage our employees to go to their immediate manager, People & Culture/ HR or top management for incidents that violate our guidelines and values. However, we acknowledge that this is not always appropriate, which is why it is possible to use the whistleblower system. Here, everyone – also outside Norlys – can report anonymously. Read more about the whistleblower system and handling of reports under [Business Conduct](#).

In addition, we actively encourage employees to report potentially hazardous conditions through our service management software, which ensures easy and reliable detection of security incidents.

Through the right management systems and reporting channels, we can continuously access, investigate and update appropriate procedures to ensure effective mitigating actions.

## Global framework agreements, collective bargaining agreements and local agreements

Norlys has a number of collective bargaining agreements and local agreements that ensure minimum rights for employees, including pay, working hours, leave, time off, notice period and illness. Whether employees are covered by a collective bargaining agreement or local agreement depends on their employment conditions. The terms are negotiated periodically, and the results contribute to improving employee rights. Collective bargaining agreement outcomes and general industrial initiatives are regarded as positive contributions to enhancing the rights of workers and do not conflict with Norlys' interests.

Employee-elected union representatives represent the interests of employees – especially in connection with collective bargaining agreements and local agreements. They work to promote a good working environment and ensure that agreements are complied with. The union representatives are often directly involved in negotiations and are also represented in the CCs.

Norlys respects human rights in all activities, including under the UN and ILO principles of freedom of association and collective bargaining. In Denmark we have freedom of association, and membership of trade unions and other associations is not a matter which concerns Norlys.

# Collective bargaining coverage and social dialogue

S1-7

In 2025, 45% of employees were covered by a collective bargaining agreement. Employees without a collective bargaining agreement are covered by the Danish Salaried Employees Act and Norlys' attractive working conditions.

Percentage with collective bargaining agreement and union representative	2025	2024
Employees covered by collective bargaining agreements	45%	47 %
Employees covered by union representatives	34 %	42%

### Accounting policies

The proportion of employees covered by the collective bargaining agreement and/or covered by union representatives is calculated as the number of employees covered by the collective bargaining agreement and/or union representative in relation to the total number of employees, measured as the headcount at the end of the period. The statement only covers employees in Denmark, as Norlys does not have 50 or more employees in other countries. Therefore, no collective bargaining agreements or social dialogue in other areas are reported.

There is currently no agreement with employees for representation in a European Works Council (EWC), a cooperation committee for Societas Europaea (SE) or Societas Cooperativa Europaea (SCE) or with employees outside the EEA who are covered by a collective bargaining agreement, and they are therefore not included in the table.

Employees covered by union representatives reflect the social dialogue. Health and safety representatives are not included.

# Characteristics of company employees

## S1-5

The number of employees increased by almost 200 in the period, while employee turnover decreased.

Automize is being wound up, resulting in a significant decrease in the number of employees in the company. However, many of the former employees are still in the organisation as they have moved to Kundeselskabet or Mjølner, which have also experienced growth. In autumn

2025, Kundeselskabet underwent a major restructuring in which several roles were merged and a number of employees were laid off. The effect of these changes is not yet fully visible, as several laid-off employees are still under contract.

In 2025, women accounted for 30% of employees, while men accounted for 70%.

S1-5 Characteristics of company employees	2025	2024
<b>Employee distribution, number</b>		
Women	1,419	1,419
Men	3,245	3,048
Total number of employees	4,664	4,467
Total number of employees, cf. annual financial report – FTE	4,433	4,135
<b>Employee types, number</b>		
Permanently employed women	1,388	1,379
Permanently employed men	3,190	2,949
Total number of permanent employees	4,578	4,328
Temporary employees women	31	40
Temporary employees men	55	99
Total number of temporary employees	86	139
Total number of hourly paid employees	210	198
<b>Employee turnover, percentage</b>		
Employee turnover	21%	23%

### Accounting policies

Employee distribution and types are calculated as a headcount, and gender is determined based on CPR numbers. In contrast to 2024, the figures were calculated at the end of the period to provide a current picture of employee types and numbers by men and women at the end of the period, rather than allowing the calculation to be affected by the beginning of the year. To show the development, reference is made to the figures for 2024, which are based on the average number of employees at the end of each month.

Employees with a fixed-term position are registered as temporary employees, while others are reported as permanent employees. Hourly paid employees are employees whose working hours are settled per hour and who do not have guaranteed hours.

Employee turnover is calculated as the ratio between the number of resigned employees and the average number of employees in the period, based on the average number of employees at the end of each month.

As Norlys has less than 50 employees in countries outside Denmark, reports are submitted for all employees and not by country.

The total number of employees, cf. the financial annual report, differs in the method, as this is not calculated according to headcount, but instead according to the ATP method. Read more about this in [the Annual Report for 2025](#) under Notes.

# Non-employees

## S1-6

To strengthen Norlys' flexibility, we contract with Danish temporary work agencies and construction companies to deliver some of our services. Non-employees perform various tasks, including functions such as temporary staff, contractors, technicians, customer centre employees, consultants and specialists.

The 2,535 non-employees affiliated with the Group are in addition to 4,664 internal employees at the end of 2025.

Characteristics of non-employees in the company's own workforce	2025	2024
Non-employees, number	2,535	2,435

### Accounting policies

Non-employees are defined as employees who are not employed by any of Norlys' companies, but who are considered part of our own workforce because they are significant contributors to the business model. Including employees with access to systems/servers.

The number of non-employees is calculated as a headcount. As opposed to 2024, the figures were calculated at the end of the period. In 2024, this was calculated as the average for the year by taking the average of the total number of non-employees at the end of each month.

# Consumers and end-users

S4

As Denmark's largest integrated energy and telecommunications group, Norlys has a special obligation to take responsibility for the security of our consumers, end-users and society. In the current geopolitical reality, the threat landscape is constantly evolving, and in 2025 the risk of cyberattacks was higher than in previous years. This comes with a responsibility to protect the data, networks and systems that keep society going. We must ensure the robustness of the critical infrastructure we manage, as customers, members, businesses, institutions and society are heavily dependent on the services provided by our network.

Exposure to cyber security threats and cybercrime as well as an increased level of preparedness are particularly important for Norlys, as any compromises here may threaten the security of consumers and end-users. We are committed to building and strengthening digital resilience so that we can resist and quickly recover from attacks. At the same time, we ensure that consumers, end-users and businesses can navigate the digital society safely. As a provider of national critical infrastructure, data

protection and network security are key to maintaining the trust of customers, stakeholders and society, and we must protect network integrity and the right to privacy.

We also have the privilege of being in direct contact with consumers and end-users through a broad portfolio of products and services used in all phases of life. With this comes responsibility – both in the marketing of our products and in ensuring the security of our customers. It is our primary responsibility to ensure that our business practices do not harm the most important stakeholders, our customers. We want to create transparency about products and services so that consumers and end-users are well informed and can make decisions based on clear and accessible information.



Not all Norlys companies are directly involved with consumers or end-users, and the potential negative impacts identified in the double materiality assessment therefore include the core business. However, all companies are covered by the Group's policies and the general efforts to ensure data protection and security.

## Norlys' material impacts, risks and opportunities

### Personal safety for consumers and end-users

#### Strategy and business model:

It is an integral part of running critical infrastructure to address security of supply. It is therefore essential that this is integrated into the business models and the overall strategy. The protection of IT systems and data is a prerequisite for delivering our many services. IT security is fundamental to our operations and an established part of Norlys' governance and strategic priorities.

#### IT and cyber security, data protection: I

There is a risk of third-party impact on our services across the business that can compromise IT systems and consumption data, for example protecting information about the users' location. This can potentially affect customers in all business units.

Time horizon: Medium



#### Security of supply of critical infrastructure: I

Norlys operates critical infrastructure. The functioning of society may be impaired with serious consequences in the event of lasting interruptions or outages.

Time horizon: Independent



#### Abbreviations

- I Impact
- R Risk
- O Opportunity
- + Positive
- Negative
- F Actual
- P Potential
- E Own operation
- VC Value chain

# Cyber and information security and data protection

## Security policies and security standards

S4-1

At Norlys, we strive for a high level of security in all our activities, so that we minimise the risk of third-party impact on our services and protect the privacy and critical infrastructure of our consumers and end-users. This approach is underpinned by our IT and cyber security policies and standards, as well as preparedness and crisis management.

Norlys has an overall cyber and information security policy that sets the framework for cyber and information security. The policy aims to introduce a risk-based approach to protecting information, data and systems as well as securing critical infrastructure against threats and attacks. It defines responsibility and principles for maintaining confidentiality, integrity and availability of information assets and sets objectives based on Norlys' overall strategy. The objectives must maintain a level of security that both meets applicable legislation and meets our stakeholders' expectations for security and stability in critical infrastructure.

The policy covers all systems, individuals and processes that constitute Norlys' information systems, including third parties with access to the systems, and applies to all majority-owned companies in Norlys. It is anchored

in Group CISO, which is responsible for the annual update of the policy. The policy is also underpinned by policies and fundamental guidelines in the respective companies that are adapted to their business activities. The responsibility for these guidelines lies with the individual company's CISO or senior management in those companies where there is no CISO.

The policy is available internally on the intranet and is also shared with relevant business partners.

### **Additional security guidelines – strengthening the security culture**

In addition to the above policy, Norlys has a wide range of IT security guidelines covering, among other things, risk management, information security in supplier relationships, network security, artificial intelligence and regulatory notifications. The guidelines are intended to help us ensure the highest standards that continuously improve the security of Norlys and our users and comply with applicable legislation in this area.

Our efforts to maintain security are also supported by our emergency response and crisis management policy, in which guidelines set out how we handle crises in a

rapid, structured and efficient way to restore normal operations without unnecessary disruption. The policy is updated continuously, so that we constantly align with the level of preparedness and the necessary security.

### **Consideration of stakeholders in the development of policies**

In developing our policies, we take into account relevant stakeholders. We actively engage with our customers, business partners, owners and regulators to ensure our policies reflect their needs and expectations. We conduct regular risk assessments and consultations to identify and address potential risks and opportunities. Stakeholder views, best practices and regulatory requirements are part of policy development.



Case

## Norlys protects its customers and combats SMS fraud

Many Danes are exposed to fake SMS messages, also known as smishing, with fraudsters pretending to be a company and encouraging people to disclose credit card information. At Norlys, we have strengthened our efforts to protect our customers as well as our brand. We are now better equipped to quickly identify SMS fraud and to close the fake websites.

In spring 2025, several thousand Danes were hit by a smishing campaign, where fraudsters pretended to be Norlys Customer Service and sent fake links to bills. We managed to quickly take down the phishing websites and report the limited amount of stolen card information to NETS so the cards could be securely blocked. We don't just warn our customers – behind the scenes, we work hard to stop fraud and protect them.

# How we increase security

S4-3

Security and protection of critical infrastructure is more than just a matter of regulatory compliance – it’s an integral part of our principles, customer promises and values of accountability. Norlys offers products and services for essential societal functions, including electricity grids, energy trading, charging networks, the internet and mobile networks, which are critical for our business, for consumers and end-users, and for society as a whole. We are therefore working hard to increase security, reduce negative impacts from our activities and ensure that initiatives do not conflict with business activities and strategic priorities.

We maintain initiatives that have the desired effect and implement new initiatives on an ongoing basis to strengthen security

## Policy for cyber and information security

The work with cyber and information security is based on current legislation in this area, including NIS2 and the Danish Act on Increased Emergency Preparedness (lov om styrket beredskab). The implementation of the legislation is supported by recognised standards, including the ISO 27001/2 standard, controls from the Center for Internet Security (CIS) and NIST.

The recognised standards strengthen our ability to identify threats, protect critical functions, detect network problems, remedy incidents effectively and quickly rebuild after outages. The approach is continuously reassessed and adapted in line with the threat landscape, and we ensure that all relevant parties are involved in the process, so that the necessary measures are taken to follow best practices and protect consumers and end-users.

Norlys’ cyber and information security is strategically overseen at management level through a common framework for reporting, impact assessments and ongoing risk assessments. This means that appropriate measures can be taken that fulfil our critical social obligations and

protect the security of our stakeholders. The Norlys Security Operations Center (SOC) supports these efforts by ensuring proactive protection and maintaining confidentiality, integrity and availability of digital assets and operational capabilities. In cyber security incidents, it is typically the SOC that activates an escalation chain involving relevant employees and stakeholders.

Norlys Tech Hub is also working on implementing the ITIL framework for operational processes to minimise IT downtime and maintain a high standard of operation and service, which is crucial for reducing negative impacts on consumers and end-users.

## Increased security measures and resources

Norlys continuously implements security measures that increase IT and cyber security for customers, members and other stakeholders. The measures include risk assessments of assets and suppliers, implementation of new systems as well as skills development and training of relevant employee groups. They must ensure that we protect all aspects of the company and the people who rely on our services.

In 2025, we have generally strengthened our cyber security capabilities with significantly more resources and employees with specialised knowledge in the area to meet the increasing demands and to keep increasing security in combination with the increased security measures.

Several major compliance and security projects were prioritised in 2025, including implementation of NIS2, testing of security procedures and physical security. In addition, a lot of work has gone into improving, updating and subsequently testing contingency plans as well as conducting regular contingency testing and emergency drills.

In the coming year, a comprehensive security posture management programme will be implemented with increased focus on vulnerability scans and ethical hackers

(red teams). Firewall systems are being upgraded, advanced threat detection systems are being improved, and the SOC is being expanded for internal 24/7 monitoring. This will safeguard our ability to detect and respond to threats in real time. A new cyber security training strategy ensures relevant employees are constantly up to date on the latest security threats and best practices.

Norlys has also developed an integrated security solution in internet packages for private individuals and businesses, which gives customers access to security measures that protect against hacker attacks and viruses and help them stay safe online.

## Data protection

With increasing digitalisation of society, there is also a greater responsibility to ensure the protection of personal data and to safeguard the right to privacy of consumers and end-users. Norlys therefore continuously implements security measures that increase data security for our customers, members, employees and other users, including risk assessments and updating of processes and procedures in accordance with legislation as well as ensuring data protection in the development of new products and services.

In 2025, Kundeselskabet updated guidelines with a focus on data management, data protection, artificial intelligence and data ethics as a solid foundation for legal and data ethics assessments. The areas of expertise in the company will continue with specific initiatives based on the guidelines to ensure that we maintain a strong focus on protecting the data entrusted to us by our customers and society.

We generally follow the UN Guiding Principles on Human Rights, and our guidelines uphold the direct rights of consumers, among other things by ensuring the right to privacy.

## Digital responsibility

Norlys wants to create a safe environment, so it is safe to move around the internet and use our services. We protect consumers by blocking illegal online content, including child pornography, extremist material and other harmful websites. In the case of child pornography, blocking takes place via a voluntary industry agreement whereby Save the Children and the police provide lists of illegal websites to internet services providers (ISPs), who then block them through DNS blocking. With respect to terror-related content, PET obtains blocking orders and provides information to the ISPs. Similarly, the police can obtain blocking orders for websites used in connection with serious crime, such as serious fraud, extortion and money laundering. Norlys also carries out blocking in accordance with EU sanctions related to the war in Ukraine.

In addition, Norlys cooperates with other ISPs to block illegal gambling websites, IP rights violations (e.g. pirated copies of films and music) and dangerous products. The ISPs share the burden of court proceedings to process subpoenas from the Danish Gambling Authority, the Danish Rights Alliance and the Danish Safety Technology Authority. Court rulings are subsequently circulated within Teleindustrien (Telecommunications Industry Association in Denmark), and DNS blocking is implemented by all members, so we jointly increase protection against illegal content across Danish ISPs.

In 2025, Kundeselskabet also started looking into screen time, and data shows that one out of every two Danes wants to reduce the time spent in front of the screen. Although there are no specified requirements from the EU or Danish authorities yet, Norlys has chosen to take responsibility, entering into a collaboration with Digitalt Ansvar (Digital Accountability). The collaboration will continue in 2026 and is an attempt to reduce screen time through targeted campaigns, information sharing and apps, among other things.

Case

## ‘Screen Time’ digital responsibility

### The Screen Time will give Danes control of their mobile phone again

Danes spend an average of 8.6 years of their lives in front of the mobile screen, and the unhealthy screen habits are a societal challenge. As a telco company, Norlys wants to focus on the fact that technology, screens and social media consume more of our time and attention than many of us want. In collaboration with Digitalt Ansvar (Digital Accountability), Norlys therefore launched the ‘Screen Time’ app, which aims to make it easier to be aware of screen use in everyday life. The app is freely available to everyone. It provides an overview of screen usage and allows people to make adjustments so they don’t spend more time on their mobile than they want.



# Processes for engaging with consumers and end-users, complaint channels and mechanisms

S4-2

Norlys wants to be proactive in the way we regulate our business. This applies to the development of products and services, marketing and communication activities as well as improvements in the security of critical infrastructure. We therefore have a special focus on taking responsibility and engaging with consumers and end-users to strengthen their security and meet their needs and priorities.

## Dialogue processes and channels

Norlys interacts with many consumers and end-users through the provision of infrastructure, products and services. Our contact and complaint mechanisms are therefore distributed among the various companies. Consumer and end-user involvement takes place at several levels and through several different forms of dialogue, so that we can gain insight into how our actions serve our customers or might have an inappropriate impact that we need to put right.

We have direct dialogue with our end-users, primarily via customer service and Norlys stores, where employees handle enquiries, concerns and complaints. Customer service enquiries are typically made digitally via our website or by telephone, but can also be made via a third party who can involve Norlys if necessary. In addition, we include customer perspectives through customer representative groups, customer satisfaction surveys, interviews, social media as well as customer panels for active development of products and digital solutions.

This engagement with consumers and end-users

provides a key understanding of their views, needs and interests, which is actively used to improve processes, products and services. The insights are passed on to relevant parts of the organisation so that we can adapt our practices and remain relevant to customers. When our products and services do not meet customer needs, we incorporate their feedback as a basis for decision-making for future activities and guidelines.

Norlys also incorporates customer perspectives in setting objectives, taking corrective actions and adjusting policies. For Elnetselskabet N1, this happens through member-elected representatives of the Board of Representatives, who elect directors of the a.m.b.a. Board of Directors. In this way, our members have influence through their ownership. They also have dialogue meetings with electricians, municipalities and their largest customers.

We handle as many complaints as possible internally to ensure prompt and fair treatment. Complaint statistics are shared internally, and complaints are followed up if they indicate a need to change information or processes. Telecommunications and internet customers also have the option to complain to the Telecommunications Complaint Board, and all customers can complain to the Consumer Ombudsman. For more serious incidents that have a significant impact on our consumers and end-users, including suspected fraud or offences, they are encouraged to report via the whistleblower system. [Read more about this under G1.](#)

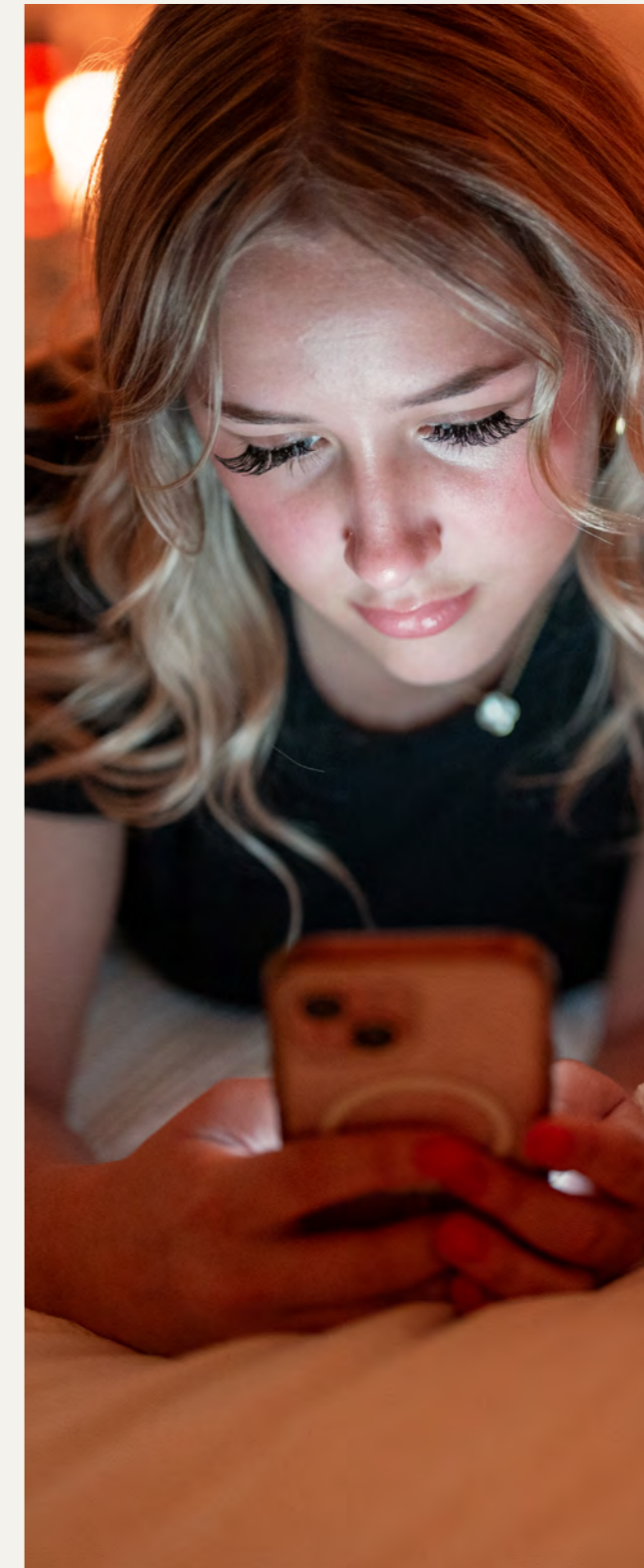
As a supplier of critical infrastructure and a major player in highly regulated industries, we have close dialogue with trade associations and authorities, including intelligence services. Norlys has processes that alert companies to security problems and alert intelligence services and other authorities to specific threats, such as IP addresses that can be exploited by foreign states.

## Protecting vulnerable groups

Norlys works to protect all our customer groups and increase security across business activities, as a lack of security can have fatal consequences. At the same time, we are particularly committed to protecting vulnerable groups, including minors, from harmful or illegal use of our products and services.

As providers of internet and mobile devices, we feel a special responsibility to ensure that it is not used for harmful or illegal material. We have therefore introduced special safeguards for children, e.g. requirements for active parental consent in a family account and an age limit of 18 years to become a customer. In addition, we work with Digitalt Ansvar (Digital Accountability) to focus on responsible screen time and online safety from the child's point of view through campaigns and public information material.

Our customer service teams and store employees also engage in dialogue with customers, including potentially marginalised groups, and their insights are similarly input to inform future decisions in Norlys.



Case

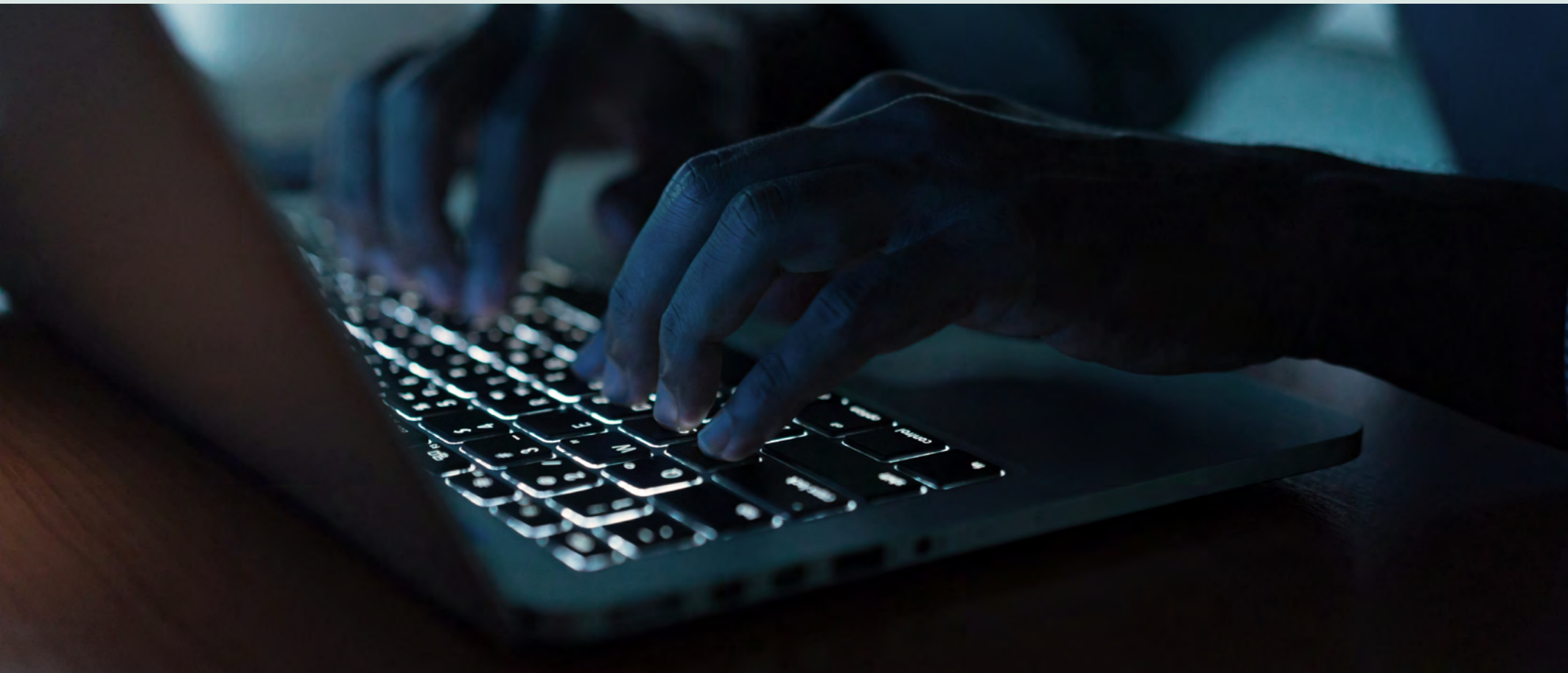
## Together against loneliness - Call me and Ventilen make real connections

At the mobile company Call me, which is part of Norlys, we believe that the best connection is the one we have with each other. One in six young people between the ages of 15 and 30 feel lonely – many even when they are with others\*. That is why we entered into a partnership with the voluntary social youth organisation Ventilen. With the collaboration, we want to break the taboo and motivate those who struggle with loneliness, as well as their relatives, to seek help. In addition to increasing awareness of Ventilen among the Danish population through extensive media exposure, Call me also supports Ventilen's work financially through several initiatives. About the collaboration, Ventilen says:

*"The partnership with Call me has enabled us to reach the general public and especially young people more than we could ever have achieved alone. This means that more people are aware of our work, more people understand the consequences of loneliness, and more volunteers want to help other young people. When more people know us, we are stronger and can enter into new collaborations, but most importantly, we can make a difference for more young people who experience loneliness."*

Through joint efforts, we make a difference and help more young people find their way into strong communities.

\*Source: "The lonely generation – a survey of young people's well-being and loneliness" conducted via Norstat's population panel for Call me and Ventilen, 2025.



# How we ensure the effectiveness of our policies and actions

S4-4

In addition to dialogue processes with customers, consumers and end-users, the effectiveness of our policies and actions is ensured through ongoing employee training, internal controls and reporting, and due diligence.

#### Employee training

It is essential to strengthen the employees' skills and security awareness to minimise human risk factors. Employees act as a critical defence against external threats to our data systems and digital infrastructure. Therefore, all employees complete training in recognising and handling phishing attacks via simulation exercises and training modules. In addition, everyone must complete a GDPR process that ensures they understand and comply with the General Data Protection Regulation.

#### Reporting and management follow-up

Top management receives regular reports about availability, outages, downtime, the number of disconnected customers, security incidents and employee training results. This ensures that management is always up-to-date on the company's security status and can make informed decisions. As part of the management control of information security, management considers whether projects and initiatives are working as expected, and whether there are sufficient resources and competences to deliver on the agreed objectives and ambitions in terms of security and stability.

Regular reports on preparedness/resilience and cyber and information security are submitted to the Risk and Audit Committee (ARC), the Board of Directors and company managements. This includes evaluating our ability to resist and recover from security incidents. In addition, plans for management-approved crisis management plans and contingency plans in the core business are tested and reviewed at least annually or in the event of major changes.

#### Due diligence

The ongoing due diligence process must also ensure that Norlys complies with applicable legislation. In the event of new initiatives or changes, the compliance and suitability of processes are monitored to ensure that they are effective and reduce any negative impacts on consumers and end-users. Policies and procedures are regularly updated as part of this process.

## Framework and process for mitigating negative impacts on consumers and end-users

In the event of reported incidents that have caused or contributed to significant negative impacts on consumers, end-users or customers, we follow a rigorous process for remediation. The process includes evaluating the impact, identifying affected stakeholders, tracking the incident, initiating mitigation and corrective actions to prevent similar incidents going forward. Corrective actions and the departments or employee groups that will handle and facilitate the necessary actions are assessed in each individual case.

Complaints to complaints bodies, the Consumer Ombudsman's statements and the Danish Data Protection Agency's decisions and any fines to providers continuously show whether our many activities comply with the rules.

In cases where we or other actors with comparable practices receive warnings, criticism, orders or lose appeals, we make sure to change our practices according to the instructions. We also follow recommendations from the Consumer Ombudsman and updates in legislation to ensure that our marketing is appropriate.

#### Data security

Digitalisation and the use of artificial intelligence are accelerating, and it has never been more important to handle data responsibly. Data is a central part of the digital transformation, and we work hard to keep data protected and to use it with great care. This is crucial to maintaining credibility and trust in Norlys and creating value for customers, employees and society in a transparent and

responsible way.

All IT or data security incidents are handled as soon as they are discovered, following the applicable guidelines and an up-to-date risk assessment. This is an important part of our responsibility to consumers and end-users. After each incident, the need for lessons learned activities and preventive measures is assessed.

Elnetselskabet N1 is also subject to confidentiality requirements in accordance with the Danish Electricity Supply Act (Elforsyningsloven), while Kundeselskabet and Sinal in the telecommunications area are subject to the requirement of confidentiality of communications, cf. the Danish Telecommunications Act (Teleloven).

# Governance

## Highlights 2025



### Investments in community and social development

Through Norlys Vækstpulje (Norlys growth pool), Norlys awarded DKK 63.1 million in 2025 over three application rounds to projects that strengthen communities and contribute to the green and digital social transition. In total, 984 initiatives have received funding.



### No reports of corruption in 2025

Norlys has zero tolerance of any forms of corruption and bribery. We have a well-established whistleblower system that allows for anonymous reporting. In 2025, no breaches of corruption and bribery procedures or standards were registered.



### New Code of Conduct

A new Code of Conduct for employees sets clear requirements and provides guidelines to employees to ensure a proper and strong corporate culture. A corporate culture that is free from corruption and bribery, among other things, and that ensures transparency should any irregularities arise.



### Members at the centre

Cooperative democracy is a cornerstone of Norlys. Twice a year, we hold dialogue meetings with our Board of Representatives, where members have the opportunity to ask questions and discuss Norlys' priorities and key projects. As a cooperative, Norlys has a responsibility to create long-term value for members, customers and society, which is reflected in our investments in renewable energy and critical infrastructure, among other things.

# Business conduct

G1

In Norlys, corporate governance is more than just structures and processes, it is a fundamental driver of our contribution to the development of society, the green transition and digitalisation. Being Denmark's largest cooperative energy and telecommunications group, our management structure rests on a strong democratic foundation and close dialogue with our stakeholders. Our ownership structure supports long-term decisions and strategic investments in a responsible transition and critical infrastructure for the benefit of members as well as society. At the same time, it ensures that value creation remains in Denmark.

Responsible business practices are fundamental to the products and services we provide and to the value we create in society. Norlys' mission statement and strong values guide our decisions and actions, and we want our owners, customers and employees to be proud of Norlys. Integrity and credibility are key principles in both day-to-day operations and strategic decisions. We will always comply with applicable laws, rules and recommendations for corporate governance and ensure transparency to our stakeholders across the value chain.



## Norlys' material impacts, risks and opportunities

IRO

### Corporate culture

#### Strategy and business model:

Whistleblower systems are integrated into our group governance structure.

#### Protection of whistleblowers: I

As a large Danish company with operations spread across the country, within different sectors, and with extensive use of suppliers of different services, there may be breaches of guidelines. The relevant reporting channels must ensure the safety of those reporting; otherwise, the impact on the individuals in question can be significant.

Time horizon: Short



### Political influence

#### Strategy and business model:

Political influence and lobbying activities are a strategic priority. Norlys' political influence and lobbying activities are handled by the Public Affairs department, which executes our PA strategy. The impact affects our own activities – especially in Sinal and Kundeselskabet, whose financial conditions may be significantly affected by political regulation. Political influence and lobbying activities for Elnetselskabet N1 are handled separately in the company.

#### Political influence and lobbying activities: I

A major player in critical industries, Norlys represents over 805,000 members. Our status as a cooperative gives us an important voice in society. We contribute knowledge and experience in digitalisation and electrification through political influence and lobbying activities as well as dialogue with decision-makers. Due to the functional separation, the political influence and lobbying activities of Elnetselskabet N1 are managed separately from the rest of the Group.

Time horizon: Independent



#### Political focus on critical infrastructure: R

Norlys provides critical infrastructure and operates in highly regulated industries. Many of Norlys' activities are therefore subject to strict regulatory requirements, and changing political conditions can affect the company's ability to invest in the green transition and digitalisation of Denmark. Ongoing political influence and lobbying activities are crucial to ensure stable and predictable framework conditions and reduce the risks associated with changing political decisions. Due to the functional separation, the political influence and lobbying activities of Elnetselskabet N1 are managed separately from the rest of the Group.

**Resilience:** See 'Strategy and business model'.

Time horizon: Long



#### Abbreviations

- I Impact
- R Risk
- O Opportunity
- + Positive
- Negative
- F Actual
- P Potential
- E Own operation
- VC Value chain

# Policies related to responsible business conduct

## G1-1

Sound corporate governance is fundamental to a healthy company and to maintaining our stakeholders' trust in Norlys as an actor in society and achieving our ambitions within environmental, social and ethical matters. Strong corporate governance promotes the desired employee behaviour and aligns companies across the organisation. Bearing in mind Norlys' corporate structure and continuing growth, it is essential to ensure compliance with our shared values, and we therefore have a number of policies that support sound corporate governance and ensure that our values and principles are integrated into our daily lives.

To ensure responsible and ethical conduct, Norlys has two Codes of Conducts outlining the principles we adhere to – one for employees and one for suppliers and contractual third parties. The Code of Conduct for employees provides the framework for accountability throughout Norlys, while the Code of Conduct for suppliers supports this. Together, they help to ensure that sound corporate governance is implemented in our activities.

### Code of Conduct for employees

Norlys' Code of Conduct for employees describes the guidelines for how we conduct our business in a legal and ethical manner through good practices. The purpose of this policy is to guide our employees towards conducting themselves in a way that fulfills our responsibilities to our owners, customers, business partners, and society. The policy establishes a shared responsibility for:

- Protection of human rights and labour rights, including the prevention of human trafficking, forced labour and child labour.
- Data ethics and data protection.
- Transparency in the use of artificial intelligence.

- Business ethics, including anti-corruption and anti-bribery, conflicts of interest, and responsible political influence and lobbying activities.
- The environment, including climate change and circularity.

The Code of Conduct for employees was prepared in 2025 and implemented in 2026 by Group Culture & Leadership, including dissemination and awareness of the policy.

### Code of Conduct for suppliers

The Code of Conduct for suppliers ensures that our suppliers support our principles for responsible corporate governance, which can be found in Norlys' Code of Conduct. We demand that our suppliers and business partners comply with the guidelines set out in our Supplier Code of Conduct. The purpose is to offer guidance for our suppliers and contractual third parties on responsible corporate governance in accordance with Norlys' guidelines and to create good working conditions in the supply chain. When working with Norlys, suppliers and partners are expected to:

- Incorporate environmental considerations and reduce climate change, including contributing to Norlys' climate goals.
- Respect and uphold fundamental human rights and labour rights in accordance with international conventions.
- Ensure a healthy and safe working environment.
- Conducting business ethically with a focus on preventing fraud, corruption and bribery.
- Comply with applicable laws and international standards.

Our suppliers must establish systems to handle these issues and do everything they can to ensure that subcontractors and other third parties also follow the policy.

Our Codes of Conduct serve as a guiding framework for social, ethical and environmental conditions and are based on Norlys' values. They are based on international standards such as the UN Convention against Corruption, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the Rio Declaration on Environment and Development and the International Labour Organization (ILO). The commitments to respecting human and labour rights are embedded in our policies, underlining their importance – both in our own business and in the activities across the value chain.

The Code of Conduct for employees includes all employees, directors and external workforces of all majority-owned companies. It is anchored in Norlys Group Culture & Leadership, which is responsible for continuous policy updates and improvements. It is the individual managers' responsibility to make the employees aware of the existence of the policy and ensure compliance with the policy. The Supplier Code of Conduct covers all suppliers and contractual third parties and is updated annually. Compliance with the policies also takes into account the functional separation of Elnetselskabet N1 from the rest of the Group, including the requirement for independent decision-making powers.

Norlys Energy Trading also has its own Code of Conduct, and Elnetselskabet N1 has its own Supplier Code of Conduct. However, this is based on the Group's content and obligations.

Norlys' Code of Conduct for employees is available on the intranet, while our Supplier Code of Conduct is available at [norlys.dk](http://norlys.dk).

### Additional guidelines for responsible business conduct

Moreover, we are actively engaged in responsible financial management and are committed through a number of policies that all support sound corporate governance and help ensure appropriate financial conduct. The policies include our fiscal policy, remuneration policy, tax policy, investment policy and insurance policy. The purpose of the policies is to establish principles, requirements and responsibilities when it comes to Norlys' approach to responsible financial management and to ensure the alignment of interests with Norlys' Board of Directors, management and employees.

Norlys Energy Trading also has several separate policies in place for their company, as, among other things, they are subject to additional measures in connection with energy trading. This applies, among other things, to their Policy for Compliance, which describes the principles and procedures that must

be followed to ensure compliance with applicable laws, regulations and internal standards within the EU.

### Functions and roles that are particularly vulnerable to corruption and bribery

Norlys has its primary business activities in Denmark, which according to Transparency International remains among the world's least corrupt countries. Therefore, the risk of corruption and bribery is generally assessed as low among our own employees.

As critical infrastructure providers, however, we take precautions. We conduct security screenings of key employees in functions of particular importance to cyber and information security as well as electricity supply. These measures are particularly relevant in companies whose business activities and size make them particularly vulnerable.

Mjølnær and Norlys Energy Trading have activities in Spain, Germany and Singapore, respectively. While Germany and Singapore are also high on the list of least corrupt countries, corruption is more prevalent in Spain. We assess the risk as low-likelihood and low-impact, as the employees in the countries in question do not carry out business-critical activities.



In connection with Norlys' asset management, we collaborate with an independent external adviser who regularly conducts screenings of our investments to ensure that they comply with our investment policy – including compliance with sustainability criteria. In addition, an annual sustainability analysis of our portfolio is also prepared. The 2025 analysis again shows that we fully comply with our responsible investment policy and documents that our portfolio has a low ESG risk and a significantly lower climate footprint than both the benchmark and relevant peers.

# Framework for prevention, identification and management of corruption and bribery

## G1-2

Norlys has zero tolerance for any form of bribery or corruption. Our good business conduct policies and due diligence processes aim to prevent inappropriate and unethical conduct.

It is critical that we maintain a strong corporate culture and clear processes to avoid – or at least detect – illegal actions, including corruption and bribery. The implementation of the new Code of Conduct for employees is designed to act as a key preventive factor, requiring all employees to know and follow the rules of conduct. At the same time, we can use the processes in our Code of Conduct to identify unethical and illegal behaviour in Norlys’ own operations and in the wider value chain, including suppliers and partners. In this way, we minimise risks and amplify good business practice.

We rely on and trust our own employees and external stakeholders to report suspicions or concerns. Norlys wants to promote a culture of trust in which employees are free to speak up without risk of retaliation if they encounter breaches of procedures or actions that violate our values. Employees are encouraged to use internal grievance mechanisms, including their immediate manager, People & Culture/HR or top management. We recognise that these channels are not always appropriate, and therefore we also have an anonymous reporting process in the form of a whistleblower system.

### Whistleblower system

Our well-established whistleblower system supports our zero tolerance for bribery and corruption and allows for anonymous reporting. All reports are treated confidentially in accordance with the EU Whistleblower Protection Directive. The scheme includes several organisational units, but Greenlab and Mjølner have systems handled by a third-party law firm, and Elnetselskabet N1 has a separate reporting channel.

The whistleblower system is anchored in Norlys’ whistleblower policy. The policy aims to ensure transparency regarding the whistleblower system and to prevent any reluctance to report material matters. It describes the rights of whistleblowers and is available on the intranet and on norlys.dk. The policy is updated by Group, which is also responsible for the policy across the Group, and also follows the EU Whistleblower Protection Directive.

In 2025, no breaches of anti-corruption and anti-bribery procedures or standards were recorded, and there has thus been no need take corrective action or address breaches.

# Anti-corruption and anti-bribery metrics

## G1-4

In 2025, Norlys saw no lawsuits and received no fines for violations of anti-corruption and anti-bribery laws.

No cases of corruption or bribery were reported or confirmed during the reporting period. This does not apply to reports submitted via the whistleblower system or internal complaint mechanisms.

Corruption and bribery, number	2025	2024
Cases of violations of anti-corruption and anti-bribery legislation	0	0
Confirmed incidents of corruption or bribery	0	0



# Collaboration with suppliers and supplier relationship management

## G1-2

At Norlys, we strive to work closely with both current and future suppliers to ensure high standards and responsible practices with a focus on environmental, social and ethical matters. These criteria are clearly defined in our Supplier Code of Conduct, which our suppliers are obliged to comply with. [Learn more about the selection process and procurement under E1.](#)

Evaluation of suppliers is a critical part of our due diligence and makes it possible to work with the suppliers to identify areas for improvement, supporting a responsible supply chain. Supplier relationship management is actively monitored and supported by Norlys' whistleblower system and our Supplier Code of Conduct, as part of the contract formation process.

In general, suppliers are not audited on-site, and the work to integrate ESG into the procurement processes has continued to develop. However, in Kundeselskabet, a due diligence process is carried out, and all suppliers are evaluated through EcoVadis. Some Norlys companies have had more time to make progress than others, but the area is a priority going forward, and the new initiatives are expected to advance efforts to promote responsible supply chain management across the Group.

### Procurement team training and engagement with suppliers

In Kundeselskabet, the procurement team participates in training activities that strengthen collaboration with suppliers to improve their ESG performance. The team facilitates six ESG workshops annually to ensure that employees acquire the necessary knowledge and skills to work with ESG in supplier relationships.

During workshops and monthly ESG category meetings, the focus is on ESG KPIs and the ESG performance of strategically important suppliers is evaluated. Based on the results, initiatives and dialogues are initiated with selected suppliers with the aim of improving their sustainability performance.

In addition, Kundeselskabet uses an ESG risk management platform for suppliers, EcoVadis, which helps to identify and manage any risks around procurement-related environmental, social and ethical factors. The platform provides valuable insights into our own and our suppliers' performance and strengthens transparency in the supply chain. In this way, we can both improve our own efforts and strengthen the engagement of our partners.



## How we track the effectiveness of our policies and actions

## G1-3

We ensure compliance with our guidelines and desired conduct through ongoing training activities, the development of employees and the implementation of responsible business conduct procedures. The effectiveness of policies and actions is tracked through reporting channels, disclosure and open dialogue.

As a member of the trade association for the energy sector, Green Power Denmark, Norlys follows and reports on the 'Recommendations on corporate governance in consumer-owned utilities'. Norlys is a cooperative, and sound corporate governance is therefore about more than transparency and decency – it is also about creating extra value for our owners, who are part of the community. We report annually on 25 recommendations that include active ownership, communication with stakeholders, the Board's tasks and responsibilities, the Board's composition and competences, and remuneration. Norlys follows 23 of 25 recommendations Norlys has opted to have representatives on the Board of Directors from all 15 electoral areas, which means that we have more members on the Board than recommended. In addition, the Board of Directors of Norlys a.m.b.a. does not have external members.

### Business conduct training activities

In addition, Elnetselskabet N1 runs mandatory courses when employment starts, including a course in non-discriminatory behaviour and internal monitoring. The courses train employees in correct business behaviour with a focus on information sharing, fair and transparent behaviour, functional separation from the Group as a whole, laws and regulations as well as roles and responsibilities in the energy sector. The purpose is to ensure regulatory compliance and to prevent other parts of the Group from gaining competitive advantages by being affiliated with the grid company.



# Political influence

## Policy on responsible political advocacy

### G1-1

At Norlys we seek to play an active role in the society we are part of. That is why we actively engage in public debate and in political decision-making processes that affect our business, our industry and society as a whole. As a relevant actor in society, we see it as an important task to assert our views and contribute proactively to the framework within which we operate.

The ability to influence political decisions entails a responsibility. The policy on responsible political advocacy sets out clear guidelines for integrity, decency and transparency. The purpose of the policy is to set the framework for responsible political influence and lobbying activities in Norlys, guide our day-to-day work and ensure awareness of possible challenges and risks. It centres on:

- Norlys’ political interests, including preparation of consultation responses, meetings with politicians and participation in public debate.
- Fundamental principles of legality and decency, openness and transparency, anti-corruption and anti-bribery, and confidentiality.

At Norlys, we regard political influence and lobbying activities as a natural consequence of the democratic principle that all citizens and organisations have the right to be heard, as it contributes to making decisions on a qualified and informed basis. Our interests are mainly represented by our own employees, but we are also represented by trade associations in which Norlys is a member, including the Danish Chamber of Commerce, Green Power Denmark, the Telecommunications Industry Association in Denmark and Danske Mediedistributører.

The policy covers all Norlys employees and concerns Norlys’ own activities at all political levels – international, European, national, regional and municipal. The policy is anchored in Stakeholder Relations, which is also responsible for updating the policy as needed. Each manager is responsible for ensuring that the relevant employees at Norlys are familiar with and observe the policy. Compliance with the policy also takes into account the functional separation of Elnetselskabet N1 from the rest of the Group, including the requirement for independent decision-making powers.

The policy is updated regularly or in the event of major changes in, for example, legislation.

Furthermore, Norlys does not provide direct or indirect financial support, in-kind contributions or other donations to political parties or political candidates.

The policy is available on the intranet and at [norlys.dk](http://norlys.dk).

## Political influence and lobbying activities

### G1-5

The main topics and positions in Norlys’ political influence and lobbying activities are described below, where the most important themes and topics are categorised according to the material impacts that we report on for the 2025 reporting year, see our double materiality assessment.

The activities are carried out across the Group by Public Affairs, which represents Norlys’ political interests daily.

#### Climate change, renewable energy and energy consumption

**More renewable energy** Norlys is committed to promoting the build-out of renewable energy. Through our ownership of Eurowind Energy, we contribute to the development and operation of wind and solar farms. We participate in the public debate and work for better conditions for the build-out of renewable energy, among other things through Alliancen Vedvarende Energi and trade associations. By increasing the share of renewable energy, we can reduce the climate impact for ourselves, our value chain and society at large.

**Grid loss and Power Purchase Agreements.** Norlys is working to enable grid operators to choose to enter into PPAs on market terms to cover grid loss. The option to enter into PPAs to cover grid loss would reduce Norlys’ carbon footprint, create greater price stability for grid companies and consumers, and promote the build-out of renewable energy. This work is carried out in collaboration with trade associations and through policy dialogue.

**In 2022, the partly owned mobile network, TN-Netværket,** entered into a PPA agreement with guarantees of origin, which will secure an annual delivery of 125 GWh of renewable energy, corresponding to 75% of the total power consumption of the mobile network. In the third quarter of 2025, the newly established solar farm in Viuf, to which the guarantees of origin are linked, was connected to the electricity grid. The park is expected to be in full operation in 2026 and thus deliver the full 125 GWh annually.

**Increased consumer protection for electricity customers.** In Norlys, we believe that consumers should come first. In Norlys, we are working on concrete initiatives to strengthen consumer protection. We do this in dialogue with political actors and through our interest groups, and we have participated in the public debate. Among other things, we have contributed to the agreement on consumer protection in the retail electricity market from May 2025, which, thanks to our efforts, reflects a number of our priorities.

**Electrification of passenger cars.** Norlys wants to make it easier and more attractive to own an electric vehicle, no matter where in the country you live. Our work includes ensuring good framework conditions for the build-out of charging infrastructure and supporting a more transparent and well-functioning charging market. We also see great potential in promoting the utilisation of the flexibility potential of electric vehicles, which can contribute to a stable energy system and support the transition to renewable energy sources.

**Electrification of heavy good vehicle transport.** Norlys focuses on advancing the electrification of heavy goods

transport by putting political focus on the barriers that hamper development. These include the high cost of electric trucks and depot charging infrastructure, as well as long lead times on grid connection. We are pushing for framework conditions that support a market-driven roll-out.

#### Protecting customers and members, own business and critical infrastructure

**cyber security and protection of critical infrastructure** In a time of geopolitical tensions and a complex threat landscape where the risk of cyberattacks, sabotage and extreme weather events is increasing, it is more important than ever to strengthen the preparedness and resilience of our critical infrastructure. Norlys is committed to a close and efficient cooperation across public authorities and private companies responsible for critical infrastructure. In addition, we are working to ensure that regulatory and framework conditions support increased resilience and effective preparedness.

**Broadband.** A fast and stable broadband connection has become a prerequisite in a digitalised society such as Denmark. Everything from working from home, schooling, contact with public authorities and entertainment is now dependent on a well-functioning digital infrastructure. This is true of mobile as well as landline connections. Norlys therefore engages in dialogue with politicians, authorities and other relevant stakeholders to ensure that the framework conditions support the roll-out and upgrade of the necessary high-speed infrastructure and fair competition.

## Members of management who held comparable positions in public administration

### G1-5

There are no members of the Norlys Executive Board who have held a comparable position in public administration during the reporting period or the two previous years. Until March 2025, the CEO of Kundeselskabet was chairman of the Climate Partnership for the service, IT and consultancy sectors under the Ministry of Industry, Business and Financial Affairs, and is also a member of the Board of Representatives of Danmarks Nationalbank, which is the bank's highest decision-making authority. However, Danmarks Nationalbank is independent of the political system and cannot come under pressure from political authorities or individuals.

During the reporting period, one of the members elected by the Board of Representatives to the Board of Directors of Norlys a.m.b.a. was a member of the Danish Parliament, and one was a member of a municipal council. Each of these board members also serves on the Board of Directors of Sinal and the Board of Directors of Elnetselskabet N1, respectively. For more information about the a.m.b.a. board members' positions of trust, visit [Norlys.dk](https://www.norlys.dk).

In addition, one of the board members of Elnetselskabet N1 chairs the Council for Energy-Effective Transition under the Danish Energy Agency and also serves on the board of OpenNet. In GreenLab, one of the board members held a position in a Danish municipality during the reporting period.



Case

## Vækstpulje

### Norlys Vækstpulje (Norlys growth pool) supports communities and the green and digital social transition

Norlys Vækstpulje was launched in 2020 to support projects that in one way or another promote green innovation or local engagement and development. Like Norlys, many Danes take responsibility for more than themselves every single day, and we want to help them succeed through Norlys Vækstpulje. In 2025 Norlys Vækstpulje awarded DKK 63.1 million to a total of 984 projects of all sizes that make a social difference and support the green and digital social transition.

# Appendices

# Appendix 1

## IRO-2

### Disclosure of the material impacts, risks and opportunities identified in sustainability statements

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# Notes for reporting under ESRS E1

Norlys has chosen to take advantage of the opportunity to phase in selected reporting areas – both on the basis of materiality, ongoing work and the quality and scope of current data.

### Scenario analysis and resilience (E1-2, E1-3)

Norlys has initiated the development of a climate vulnerability analysis, which is expected to be conducted in the first half of 2026 and will assess physical climate risks. Transition risks are also being addressed on an ongoing basis.

However, the core business has already prepared contingency plans that consider climate-related events such as floods and heat waves. The contingency plans are continuously updated to ensure resilience, robustness and relevance, and are based on identified current threats to operations and infrastructure. In practice, this means that relevant climate-related risks are handled by, for example, placing equipment and assets above floor level to prevent damage from water ingress.

### EU Taxonomy (E1-1) and expected financial effects and potential opportunities (E1-11)

Norlys has chosen not to report on compliance with EU Taxonomy criteria, as Omnibus 1 in 2025 created uncertainty about the reporting requirements, and EFRAG is still in the process of revising the criteria. This will be included again when we are subject to the reporting requirements.

Our work on identification and vulnerability assessment of the Norlys Group’s physical climate risks will help clarify expected financial consequences as well as potential opportunities relating to climate change and climate adaptation.

### Internal carbon pricing (E1-10)

Norlys does not operate with an internal carbon tax, internal carbon pricing or carbon opportunity cost. It has not yet been decided to what extent Norlys will implement such an initiative going forward.

