

# ESG Compliance Checklist

Question:	Answer:
Is the Company deliberately and repeatedly violating the rules laid down by the national authorities in the markets in which the Company operate or by the international organizations endorsed by the European Union?	
Is the Company domiciled in a country subject to trade embargoes by the UN or EU?	
Is the Company operating within weapons, artillery or ammunition?	
Is the Company operating within products categorised as tobacco by the Danish Health Authority?	
Is the Company operating within artic drilling in relation to the extraction of fossil fuels?	
Is the Company operating within highly polluting extraction methods, such as the extraction of oil from tar sand?	
Is the Company operating within bottom trawling fishing along the sea floor?	
Is the Company operating within exploitation of disadvantaged social groups, for instance through the use of deceptive or exploitative subscription services?	
Is the Company operating within pornography?	
Is the Company operating within enabling illegal (a) access to electronic data networks or (b) downloading of electronic data?	
Is the Company operating within the cloning of human beings?	
Is the Company operating within gambling?	
Is the Company operating within illegal activities?	
Does the Company counteract the transition to an economy based on renewable energy resources?	
Are the primary business activities of the Company based on the use of fossil fuels or fossil fuel related activities?	
Do the activities of the Company have a substantial negative impact of the local society, people or the environment?	
Are the activities of the Company violating human rights conventions?	

P S  
V

Question:	Answer:
Is the Company exploring and/or extracting fossil fuels (coal, oil and gas)?	
Is the Company a utility company in which the CO2 intensity of its energy production exceeds 600 gCO2 / kWh or does it base more than 50 per cent of its energy production on thermal coal?	
Does the Company abuse double taxation treaties, where holding companies which do not have sufficient substance in line with the OECD Principal Purpose Test, are used for the sole purpose of reducing or avoiding withholding tax?	
Does the Company transfer pricing planning where risk and income are systematically shifted to low-tax countries?	
Does the Company use financial instruments for aggressive tax planning?	
Does the Company use hybrid companies for aggressive tax planning?	
Does the Company use highly leveraged acquisition structures in jurisdictions without general interest limitation rules in line with OECD/US principles with the aim of reducing taxable income not in line with international market standards?	