

ATP
Communication on Progress
to the Global Compact 2012

atp=



Contents

Preface	3	Special terms	11
		Other focus areas	13
Summary	4		
Social responsibility at ATP	6	Environment	14
		Electricity consumption	14
		Heat consumption	14
Human resources	8	Energy-optimisation of buildings	14
Working environment and cooperation	8	Transport	15
Training and cultural integration	8		
Employee welfare	9	Other activities	
		- clients, suppliers and anti-corruption	16
Diversity	10	The client ambassador	16
Women leaders	10	Supply-chain management	16
Women executives	10	Anti-corruption	17
Newly qualified employees and employees under 35	10	Whistleblower function	17
Employees over 55	11		



Preface

The foundation for the ATP Group's policy on social responsibility is a vision of ensuring that all Danes have the basic financial security they need. This is expressed in the delivery of positive financial results and inexpensive, seamless and efficient administration – for the benefit of ATP's clients. Operating a company in a socially responsible manner has the effect of creating increased value and security for both clients and members. This is why ATP pursues a proactive commitment to social responsibility in every aspect of its business undertakings, and readily breaks new ground and sets new standards where this makes a positive contribution to the company and the clients.

ATP signed up to the UN Global Compact (UNGC) in 2011, and continues to support its principles. In February 2012, ATP published its first Communication on Progress (COP) to the Global Compact. In addition, since 2006 ATP has been a signatory to the UN's Principles of Responsible Investment (PRI).

This communication on progress does not comprise ATP's activities concerning responsible investment; rather it describes how, over the course of 2012, ATP in its capacity as an employer has pursued its commitment to translating and implementing the ten principles of the Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption.

In Communication on Progress 2012, the primary focus area is diversity. In addition, a number of activities are reported on in relation to the other principles of UNGC. As regards the principles concerning labour standards, ATP is compliant with current Danish legislation in this area, and has a long-standing tradition for good relations between management and employees. Accordingly, the present communication reports primarily on labour standards in respect of the elimination of discrimination in working conditions and terms of employment.

With this communication, ATP also aims to influence and inspire its business partners' and suppliers' commitment to social and environmental sustainability.

31 January 2013

Henrik Gade Jepsen
Acting CEO



Summary



ATP's Communication on Progress 2012 describes how ATP in its capacity as an employer has pursued its commitment to implementing the ten principles of the Global Compact in the areas of Human Rights, Labour, Environment and Anti-Corruption. To that end, the principles of the Global Compact have been translated into three main topics: Human Resources, Diversity and Environment. In the Communication on Progress, diversity has been singled out as the primary focus area. In addition, the reporting contains a number of Other activities – clients, suppliers and anti-corruption.

Human resources

ATP maintains a strategic focus on creating a workplace conducive to employee development and job satisfaction. Therefore, priority is placed on aspects such as health and safety at work, and in 2012 ATP obtained renewal of its occupational health and safety certification up to 2015.

As part of the establishment of *Udbetaling Danmark*, ATP acquired a large number of employees from the Danish local authorities. During this process, particular attention was devoted to training and integrating new members of staff and to maintaining the high level of employee welfare, job satisfaction and productivity in the new and substantially enlarged organisation.

In a year characterised by changes affecting the business, the organisation and company culture, the annual Employee Satisfaction Survey showed high scores on

the Group's four priority areas: Job satisfaction (83), Day-to-day management (86), Day-to-day work (83) and Professional and personal development (82). With a target of 80 for each of these areas, the corporate objective was thereby fulfilled.

Diversity

At the end of 2012, ATP succeeded in achieving its targets for the proportion of women leaders and women executives, respectively. As for the proportion of employees under 35 and over 55 years of age, the targets have not yet been met, but the trend is for a slight rise.

The proportion of employees on special terms has declined proportionately, as the total number of employees at Group level has increased significantly following the establishment of *Udbetaling Danmark*.

In 2012, ATP's FASE+ department was made permanent, and extended its activities to an additional two new ATP centres. The department was also nominated for the annual CSR People Prize awarded by Business Forum for Social Responsibility, and Danish Integration Awards 2012 presented by the Ministry of Social Affairs and Integration.

In the area of recruitment, ATP has endorsed the Danish government's so-called *Akutpakke* ('acute package') to assist unemployed persons in finding work before they lose their entitlement to unemployment benefit, and gen-



erally within the Group has directed attention at the need to be proactive in the area of recruitment.

Environment

ATP has an ongoing commitment to reducing the company's energy consumption and carbon footprint. Efforts are primarily directed at ATP's buildings, and at transport. Energy consumption by ATP's five new centres is not included in this communication.

Consumption of both electricity and heat within ATP has been optimised over the last five years, and the target for 2012 has been to sustain the low level from 2011. This target was achieved, resulting in a slight reduction in both electricity and heat consumption in 2012.

As regards ATP's transport pattern, the total distance for air travel has come down, while commercial road transport has increased. Overall, carbon emissions from trans-

port have increased.

Other activities

- clients, suppliers and anti-corruption

In August 2012, ATP appointed a client ambassador to assist in enhancing service to clients. Activities during autumn 2012 included establishing policies for the client ambassador's complaints processing procedure and the creation of a system for compiling and producing statistics for complaints lodged.

ATP is committed to further improving its system for responsible supply-chain management. This work will continue in 2013.

ATP's efforts to counteract all forms of corruption include the creation of a Whistleblower function. This function is expected to be implemented within the first half of 2013.



Social responsibility at ATP

Human Resources Policy

The human resource policies are founded on various guidelines, values and policies framing management-staff relations.

Policy of Diversity

The Policy of Diversity attaches importance to an inclusive workplace in respect of gender, age, ethnicity, religion and reduced working capacity.

Health and Safety at Work Policy

The Health and Safety at Work Policy focuses on a safe, healthy and attractive work environment for everyone at ATP.

Procurement Policy

The Procurement Policy strives for sustainable solutions with emphasis on price, quality and service.

In 2012, ATP adopted an overall policy on social responsibility:

"At ATP we believe that we can create increased value and security for our clients if we operate our business in a socially responsible manner.

Our ambition is:

- *To integrate social responsibility in all aspects of daily operations in order thereby to underpin business growth within ATP and to operate a sound business for the benefit of ATP's members, clients, employees and society at large.*
- *To pursue a proactive commitment to social responsibility.*
- *To break new ground and set new standards where this makes a positive contribution to the business.*

- *To communicate openly and transparently concerning the different initiatives in our business – and thereby promote further knowledge sharing and inspiration on social responsibility."*

As a workplace, ATP's activities are concentrated around these areas: employee relations, building operation, procurement and supplier relations. ATP wishes to contribute to constructive and sustainable development where relevant and achievable within the above-mentioned areas. Aside from its Policy of Social Responsibility, the activities are laid down in the organisation's Human Resources Policy, Health and Safety at Work Policy, Policy of Diversity, Procurement Policy, values and internal guidelines and participation in the Global Compact.

Since 2008, ATP has published reports on the environ-

The ten principles of the UN Global Compact (UNGC)

Human rights

1. Businesses should support and respect the protection of internationally proclaimed human rights; and
2. make sure that they are not complicit in human rights abuses.

Labour

3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
4. the elimination of all forms of forced and compulsory labour;
5. the effective abolition of child labour; and
6. the elimination of discrimination in respect of employment and occupation.

Environment

7. Businesses should support a precautionary approach to environmental challenges;
8. undertake initiatives to promote greater environmental responsibility; and
9. encourage the development and diffusion of environmentally friendly technologies.

Anti-corruption

10. Businesses should work against corruption in all its forms, including extortion and bribery.



ment and climate, and subsequently on social responsibility, which provide an overall picture of ATP's commitment to social responsibility. ATP's reports are available at www.atp.dk

The aim is for the activities to be meaningful and relevant for clients, employees and other stakeholders, alike. In 2012, the principles of the Global Compact have consequently been translated into three main topics of relevance for activities at the workplace. The topics primarily address social and environmental issues and cut across the principles of the Global Compact. In this way, the majority of the principles are linked into ATP's business strategies, values and culture. In addition, the report contains Other activities, which comprise clients, suppliers and anti-corruption.

Human resources

This topic is distinct in comprising all employees or major areas within ATP, as opposed to diversity below, which comprises special groups only. At ATP, a fundamental principle is that all employees should feel seen, heard and understood, and that a high level of employee satisfaction is a key prerequisite for high-level client satisfaction. To that end, ATP strives to create a stimulating and dynamic workplace conducive to employee welfare and development. This translates into a focus on job satisfaction, work-life balance, competence development, excellent management, a sound working environment and employee health and welfare.

Diversity

This topic is characterised by the fact that it does not com-

prise all employees within ATP, referring instead to groups within ATP who are given special focus. ATP has a long-standing tradition for creating an inclusive workplace. Diversity is an intrinsic strength that extends work performance and ultimately improves the bottom line. Moreover, diversity is conducive to a more dynamic and inspiring work environment, not least in that it serves to promote interpersonal flexibility and learning.

Environment

ATP strives to operate an environmentally aware business, seeking continuously to reduce the company's energy consumption and carbon footprint. The focus is on selecting sustainable solutions and promoting sustainable behaviour among employees, business partners and suppliers where this makes a positive contribution to the business.

Other activities

- clients, suppliers and anti-corruption

For ATP, good client service is paramount, and with new and more administration tasks, it is vital that clients perceive ATP as open and accessible.

For supplier relations, responsible supply-chain management was launched in 2012, and will be a focus area in 2013 for the benefit of the business as a whole.

ATP is committed to counteracting all forms of corruption. In practice, this translates into a number of guidelines which apply to all employees.

Udbetaling Danmark - in brief

In autumn 2012, *Udbetaling Danmark* was established under ATP. This entailed ATP undertaking a geographical expansion with five new centres in Allerød, Vordingborg, Haderslev, Holstebro and Frederikshavn. *Udbetaling Danmark* is a new public authority under ATP. The authority is mandated to perform a number of tasks on behalf of the local authorities in relation to disbursement of family benefit, maternity/paternity benefit, housing benefit, state pension and disability pension. Under the process of establishing *Udbetaling Danmark*, ATP recruited 454 members of staff and managers.



Human resources

Through focused efforts over several years, ATP has sought to create a workplace conducive to employee development and welfare. ATP remains committed to reinforcing job satisfaction, work-life balance, competence development, excellent management, a sound working environment and employee health and welfare.

Working environment and cooperation

ATP works systematically to create a sound physical and mental working environment. Since 2003, ATP has been occupational health and safety certified to the international OHSAS 18001 standard, and has operated a company-wide occupational health and safety management system. The occupational health and safety management system is audited twice a year by an internal and external audit, respectively. In 2012, ATP renewed its occupational health and safety certification up to 2015.

As part of the efforts to support cooperation, employee welfare and health and safety at work within ATP's new nationwide organisation, ATP made the decision to merge its committee on health and safety and joint consultation committee with effect from May 2013. ATP and the trade unions have concluded an organisational agreement to that effect, which was drawn up by representatives of the

two committees. In future, the ATP Group will be overseen by an overarching group-wide committee and six local company committees – one for each ATP center.

Training and cultural integration

In 2012, in connection with the establishment of *Udbetaling Danmark*, ATP gained 454 new client-service agents. Of these, 305 client-service agents were insourced from the local authorities, and 149 were newly appointed. The focus has been on training and integrating new members of staff and on maintaining the high level of employee welfare, job satisfaction and productivity in the new and much larger organisation. In addition, ATP's HR concepts have been reviewed and adjusted based on ATP's values to ensure their sustainability in the context of ATP's new, enlarged organisation.

In 2012, all employees within *Udbetaling Danmark* completed tailored, specialist training modules. The training concept and the specialist modules are part of a wider training programme. The focus was on both specialist training and management development. In addition, the employees have received training in ATP's tools, while cultural integration has also been covered.



Trend in employee satisfaction 2008 - 2012

	2008	2009	2010	2011	2012
Job satisfaction	79	82	84	83	83
Day-to-day management	83	84	84	85	86
Day-to-day work	79	82	84	83	83
Professional and personal development	78	80	82	81	82

Trend in skills development days, sickness absence and staff turnover 2008 - 2012

	2008	2009	2010	2011	2012
Skills development days (average per employee)	9.0	8.3	8.7	8.8	8.1
Sickness absences (short-term)	4.7	5.0	4.1	4.4	4.1
Staff turnover	15.2	6.8	9.0	9.3	11.4

Employee welfare

ATP's Employee Satisfaction Survey shows high scores in a year characterised by changes affecting the business, the organisation and company culture. The objective for 2012 was to reach index 80 for four priority areas: Job satisfaction, Day-to-day management, Day-to-day work and Professional and personal development. The results for the year indicate that the target was reached for all four areas; see the table above.

ATP also monitors the trend in skills development days, short-term sickness absences and staff turnover; see the table above. In order to be able to compare the results at Group level for 2012 with those of previous years, the proportion of new employees within *Udbetaling Danmark* has

been discounted from the figures.

The aim for all employees to have at least five skills development days per annum was achieved. In 2012, employees had an average of 8.1 skills development days.

Short-term sickness absences went down by 0.3 days per employee, which is indicative of the effect of the special focus in 2012 on reducing the short-term sickness absence rate within ATP as a whole. Focus on this will be maintained, since certain areas across the Group as a whole are still prone to a high sickness absence rate.

Staff turnover at Group level increased 2.1 percentage points in the number of resignations in relation to 2011.

Results of Employee Satisfaction Survey 2012

The Employee Satisfaction Survey in 2012 is indicative of the success in maintaining a high level of satisfaction with ATP as a place to work. Every business unit in the company receives feedback on the results in detailed reports for the respective business area. The results are also reported to the administrative management, committee on health and safety and joint consultation committee. Based on the results, focus areas are identified that will be addressed in the ongoing efforts to make improvements. For any units scoring less than 75 on the index, management draws up action plans to identify ways to improve on the score. As part of the systematic occupational health and safety efforts, progress on the action plans is monitored. All employees of the ATP Group are given the opportunity to see the report and action plans for their own area.



Diversity

Staff diversity

(%)	2013			
	2010	2011	2012	target
Women leaders (excl. executives)	40	36	45	45
Women executives	21	23	34	30
Employees under 35	16	16	21	30
Employees over 55	14	12	14	20
Special terms	4.3	4.4	2.9	5.0



ATP wishes diversity to be a natural element in the working day and to be reflected in the corporate culture. The aim is to identify the potential of each employee and to facilitate their individual personal development. On a day-to-day level, the aim is for both management and staff to encourage diversity to thrive and flourish at the workplace. These are the visions and positions laid down in the Group's "Policy of Diversity", and which are lived out through the human resources policy. In order to progress from intentions to actions, a number of ambitious objectives have been set in the form of everyday practices for challenging and fuelling the organisation's initiatives in this area.

Diversity initiatives

ATP is working to achieve specific diversity targets for 2013. The aim is to increase the number of employees within five select focus areas. ATP's focus areas and target figures are presented above.

Women leaders (excl. executives)

In 2008, ATP signed the Charter for More Women Business Leaders. The aim was to achieve a broader recruitment basis for managerial positions, and this was accomplished. In 2010, ATP also became a signatory to 'Operation Chain Reaction', the object of which is to promote women's board membership. The proportion of women leaders increased to 45 per cent in 2012 as against 36

per cent in 2011, and as such, the target for 2013 has already been met. The increase is due partly to the fact that a large number of the newly appointed section managers within *Udbetaling Danmark's* client service department are women.

Women executives

In relation to ATP's diversity objective, the company's focus on women leaders is the area in which ATP has made the most progress. The proportion of women executives within ATP has now reached 34 per cent, which exceeds the target for 2013, and represents an increase of 11 percentage points relative to 2011. This is due partly to the fact that four in five of the executive centre-management positions at the new *Udbetaling Danmark* centres were filled by women. In addition, a woman was appointed to the executive position of chief communications officer.

Newly qualified employees and employees under 35

ATP aims to increase the proportion of newly qualified employees and employees under the age of 35. As a result, in 2012, ATP's recruitment has generally been more intently focused on accomplishing this. At the end of 2012, the proportion of employees under 35 was 21 per cent. This increase of 5 percentage points over 2011 is due in part to the focus on recruiting more under 35s and newly qualified employees. Recruitment of employees for *Udbetaling Danmark* is being effected in three waves. A large propor-



tion of the employees who were recruited in connection with the launch of *Udbetaling Danmark* were under 35.

ATP has a long-standing tradition for offering traineeships. In 2012, ATP had a total of nine trainees: six in administration, two in finance and a trainee chef. The expectation going forward, under the onward process of establishing *Udbetaling Danmark*, is for each center to have around four trainees.

Employees over 55

ATP is committed to increasing the proportion of employees over 55 years of age. At the end of 2012, the proportion of employees over 55 was 14 per cent. This means that the proportion has only increased by 2 percentage points relative to 2011. The pensionable age at ATP is 70 years, and there is ongoing focus on developing and offering forms of employment that provide for flexibility in order to retain employees on the labour market for longer.

Special terms

ATP has set specific targets regarding employees on special terms in order to retain focus on this aspect of the company's social responsibility. If an employee should require special workplace flexibility, for example in connection with a personal crisis, long-term illness or impaired work capacity, ATP makes arrangements with the employee's municipality of residence and other experts in work-

place inclusion to maintain the employee's connection with the workplace. To that end, ATP already has several employees on special terms such as on a wage-subsidisation or flexi-job scheme.

The proportion of employees on special terms amounted to 2,9 per cent in 2011. In 2011, the figure was 4,4 per cent. The decrease is not an expression of any lesser focus or a smaller number of employees on special terms. The figure reflects the fact that the number of employees Group-wide increased substantially in connection with the establishment of *Udbetaling Danmark*. As a result, employees on special terms now represent a relatively smaller proportion of the total workforce relative to 2011. In future, the number of employees on special terms is expected to rise, partly as a result of ATP extending a number of activities in this area, and partly due to the forthcoming influx via *Udbetaling Danmark* of insourced employees who are employed on special terms.

FASE+ and ATP's partnership with *Specialisterne* are also examples of arrangements for groups employed on special terms, and for which ATP will be extending its activities in 2013.

FASE+

In January 2010, ATP Hillerød set up a pilot department for vulnerable groups on the labour market, called FASE+.

FASE+

The purpose of the department is to integrate vulnerable groups in the labour market and ultimately enable them to be self-supporting either within or outside of ATP. FASE+ employees perform various service tasks across ATP's business units and relieve ATP units of some of their workload, allowing them to concentrate on performing core tasks. Experience to date demonstrates that it is possible to give vulnerable groups a foothold in the labour market, but that it takes management focus and individualised, thorough introduction and training.



The evaluation of the department indicates that it is possible to assist women of non-Danish ethnicity to gain a foothold on the labour market and/or to start education or training. In 2012, this department was made a permanent entity. In connection with the establishment of the new ATP centres, the decision has been made to set up a FASE+ function at each of the new sites. In autumn 2012, FASE+ was consequently expanded by additional functions at two of ATP's new centres, although these cater for other target groups.

At the end of 2012, the remaining three ATP centres are in the process of identifying the target groups their forthcoming FASE+ functions are to focus on. These might, for example, be groups such as maladjusted youth, people with mental and physical disorders or disability pensioners. The decision as to which target group is to be selected will be made in conjunction with the local community with a view to finding the target group that can make a difference in this specific setting. The centres are expected to establish their FASE+ functions at the beginning of 2013.

In 2012, FASE+ was nominated for the annual CSR People

Prize awarded by Business Forum for Social Responsibility. In addition, FASE+ was nominated for the Danish Integration Awards 2012 presented by the Ministry of Social Affairs and Integration.

Specialisterne

In May 2012, ATP started up a partnering project with *Specialisterne*, a company offering consulting services based on the special skills possessed by people with autism spectrum disorders. As a result, during 2012, two consultants from *Specialisterne* were employed at ATP Hillerød. They were assigned to a pilot project, where they performed tasks for client service and IT. The consultants are good at, for example, recognising patterns, a skill particularly suited to this type of task. Experience from the project has demonstrated a good match between the special skills possessed by the consultants from *Specialisterne*, and the tasks performed by ATP. As a result, in late 2012, ATP concluded a two-year contract with *Specialisterne* to retain the services of a total of four consultants. In the future, in addition to the above-mentioned tasks, the consultants will be performing client advisory tasks for *Helhedsorienteret Kontrol* (benefits validation system) within *Udbetaling Danmark*.

Helhedsorienteret Kontrol (benefits validation system)

The assignment to *Udbetaling Danmark* of responsibilities as a public-sector benefits disbursements authority also entails responsibility for ensuring the validity of disbursements, that is, the responsibility for validating benefit claims and implementing decisions to deter benefit fraud. The validation procedures that have been introduced are to ensure "accurate payments based on accurate facts".



Other focus areas

'Acute package'

The Danish Government has adopted the so-called *Akut-pakke* ('acute package'), and ATP wishes to contribute to this employment facilitation scheme for persons due to lose unemployment benefit entitlement. In rising to this challenge, the Group is committed to seeking proactively to recruit eligible persons.

This will be in focus in the process surrounding *Udbetaling Danmark's* third recruitment wave. ATP has engaged in dialogue with the job centres to identify unemployed persons comprised by the scheme. ATP will ensure that all applicants comprised by the acute package are, where possible, invited to attend a job interview, and that the recruitment process looks favourably on their particular skills in relation to the vacancies available. The job interviews that have been held so far indicate that ATP will be

in a position to hire a proportion of these applicants. In its recruitment process, ATP will not be easing its competence requirements for the vacancies to be filled, as ATP is not party to the reward scheme open to companies that recruit unemployed persons under the acute package arrangements.

Ahead of the adoption of the acute package, ATP also took the initiative to establish close cooperation with the job centres at the locations of the new ATP centres and their surrounding municipalities on skills development for unemployed persons within *Udbetaling Danmark's* service areas. A number of these individuals have subsequently gained employment with *Udbetaling Danmark*, and a total of 45 per cent of new employees in the first and second recruitment waves were unemployed prior to joining ATP.

'Acute package'

The purpose of the acute package is to reduce the number of unemployed persons who lose entitlement to unemployment benefit as a result of changes to the unemployment benefit rules. Jobs under the acute package scheme are on the usual terms of pay and employment and can be both permanent and temporary. To incentivise employers to find jobs for employees in acute need, a reward scheme is being introduced for companies that hire persons on unemployment benefit whose entitlement to the benefit will shortly expire.



Environment

Trend in electricity consumption 2008 - 2012

	2008	2009	2010	2011	2012
Electricity consumption, total (MWh)	3,224	2,883	2,731	2,658	2,457
Total carbon emissions (tons)	1,841	1,300	1,232	1,199	1,108
Annual carbon emissions savings (CO ₂)	119	540	69	33	91
Annual financial savings (DKK 1,000)	107	172	77	35	92

Trend in heat consumption 2008 - 2012

	2008	2009	2010	2011	2012
Heat consumption, total (MWh)	3,448	3,786	3,869	3,702	3,460
Total carbon emissions (tons)	326	358	367	350	331
Average temperature	9.2	8.6	6.9	8.9	8.3
Heating degree days (HDD)*	242	260	313	250	275

* HDD indicates the likely consumption of energy for space heating; the higher the HDD figure, the greater the consumption.

ATP has an ongoing commitment to reducing the company's energy consumption and carbon footprint. Efforts to that end are integral to day-to-day operations and are primarily directed at ATP's buildings, and at transport. Given that the new ATP centres were not taken into occupancy until autumn 2012, energy consumption figures for these premises have not been included in the figures reported here. The totals presented thus only include the sites at Hillerød and the subsidiaries in Copenhagen. Consumption of both electricity and heat has been optimised over the previous five years, and the aim for 2012 was to maintain the low level from 2011.

Electricity consumption

Since 2006, ATP's electricity consumption has been reduced. Over the last five years, ATP has averaged a financial saving of just over DKK 100,000 per annum relative to the previous year. This equates to a carbon saving of approx. 850 tons within the last five-year period. In 2012, electricity consumption was further reduced compared with 2011; see the table above.

Heat consumption

Most of the heat consumption is at ATP Hillerød, where the premises have been energy-optimised on an ongoing basis. The heat consumption generally fluctuates in response to average temperatures and heating degree days, and 2012 saw a slight fall in heat consumption; see the table above.

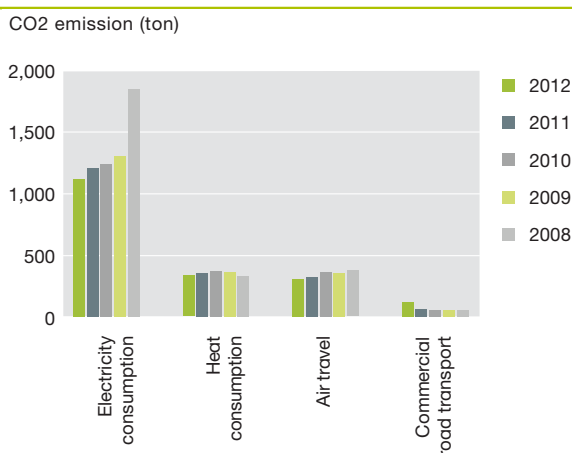
Energy-optimisation of buildings

ATP is committed, as far as possible, to contribute to the development and diffusion of environment-friendly technologies. In connection with the establishment of *Udbetaling Danmark*, on 1 October 2012 ATP acquired three new buildings, all of which were constructed as low-energy buildings, which as a minimum conform to energy performance requirements 2015. Two of the buildings have been fitted with solar cell systems to optimise building energy performance. As regards ATP's premises in Hillerød, measures have been implemented over some years to optimise this building's energy performance. Seen in the light of developments in photovoltaics, both technological and



Trend in transport 2008 - 2012

	2008	2009	2010	2011	2012
Flight kilometres	2,788	2,612	3,323	2,825	2,680
Carbon emissions from air travel (tons)	371	348	361	321	303
Commercial road transport (1,000 km)	292	277	279	323	674
Carbon emissions from commercial road transport (tons)	52	49	49	57	119
Total carbon emissions from transport (tons)	423	397	411	379	422



legislative, in 2012, ATP commenced a process to investigate and evaluate whether the establishment of solar cell systems on the Hillerød premises would make a positive contribution overall to additional energy optimisation. This project is due to conclude over the course of 2013.

Transport

In regard to ATP's transport pattern, the above table shows that the total distance for air travel has come down, while commercial road transport has increased. Overall, carbon emissions from transport have increased.

The increase in road transport must be seen in the light of the fact that the five new ATP centres are spread across

Denmark. The number of employees within the Group is due to increase further in 2013 under the final recruitment wave for *Udbetaling Danmark*. As a result, ATP's total carbon emissions from transport are expected to increase in the years ahead. ATP is monitoring developments and remains committed to limiting, as far as possible, carbon emissions from transport. This will be achieved by, for example, limiting the number of physical meetings at Group sites by providing the requisite technological facilities and thereby encouraging employees, where possible, to use different means of communication such as telephone meetings and video-conferencing instead of physical meetings.



Other activities

- clients, suppliers and anti-corruption

ATP's commitment to social responsibility also includes initiatives aimed at clients and suppliers, as well as initiatives to counteract corruption. The following describes how ATP has addressed these aspects over the course of 2012.

The client ambassador

For ATP, good client service is paramount. In the wake of new and additional administration tasks entailing even greater interaction with clients, in August 2012, ATP appointed a client ambassador. The creation of the client ambassador role is in furtherance of the ATP Group's efforts to create world-class client service and set citizen-centric standards. The client ambassador is intended to enhance service to clients and to ensure that ATP is perceived as open and accessible.

The client ambassador will be bringing client points of view into the organisation, and drawing on these to recommend improvements to client service. The client ambassador does not take the place of the statutory appeals

system, the aim is rather for more complaints to be resolved before they reach the appeals system. Activities during autumn 2012 included establishing policies for the client ambassador's complaints processing procedure and the creation of a system for compiling and producing statistics for complaints lodged.

Supply-chain management

At the end of 2011, ATP placed focus on advancing the project for responsible supply-chain management and compiling a Code of Conduct. The object is to step up ATP's efforts in this area, where relevant and feasible for the benefit of the company. ATP's expectation is equally that intensified efforts in this area will be conducive to observance of all of the UNGC principles given that responsible supply-chain management concerns both social and environmental issues.

In 2012, ATP prioritised the process of sourcing and compiling information on supply-chain management. This was accomplished partly through active participation at two

Code of Conduct

A Code of Conduct is a set of guidelines for an organisation concerning responsibility and best practices for employees and the organisation and concerning requirements for suppliers in respect of social, ethical and environmental factors.



network meetings of the Global Compact's Nordic Networks and partly through in-house fact-finding. In addition, in connection with the establishment of *Udbetaling Danmark*, ATP put a large number of contracts out to tender. The tender documents for these public procurement procedures incorporated requirements for suppliers to make effort to use materials that can be recycled or disposed of by environmentally-friendly means.

The objective for 2012 was to draw up a Code of Conduct together with procedures for managing supplier relations and sustainable procurement. These efforts will continue in 2013, where supply-chain management has been selected as the primary focus area. The development and implementation of a Code of Conduct is expected to be completed by the end of 2013. Generally, the aim is to devise, adapt and implement procedures for managing supplier relations within ATP's sphere of influence.

Anti-corruption

ATP is committed to counteracting all forms of corruption. In practice, this translates into a number of guidelines which apply to all employees. These are detailed in ATP's "Responsibility Report 2011", available at www.atp.dk.

Whistleblower function

Since spring 2011, ATP has been working to set up a Whistleblower function. This function is to ensure that ATP's employees and board can contact an impartial body in full anonymity to report internal affairs on suspicion or on evidence of reprehensible or unlawful conduct within the organisation. This function is expected to be implemented within the first half of 2013.

In 2012, a dedicated IT system was developed to deal with the type of sensitive data which a Whistleblower function must be capable of processing. In addition, a working party, appointed by the joint consultation committee, has produced information material for the employees, in which the function and a guide to using it are described in detail.

In general, the function is based on ATP's values and focuses on all employees feeling confident to report reprehensible and illegal conditions. In connection with implementing the function, information material will be available to all employees on ATP's employee portal.

ATP

Kongens Vænge 8

DK-3400 Hillerød

Telephone +45 70 11 12 13

Fax +45 48 20 48 00

www.atp.dk

<http://www.atp.dk/Contact>