



**TOPSOE**

**DATA ETHICS  
POLICY**

# DATA ETHICS POLICY

## Introduction

In this policy, we define Topsoe's approach to data ethics pursuant to section 99 d of the Danish Financial Statements Act.

Data ethics concerns the ethical considerations which we as a company must take into account when we use data and new technologies globally in Topsoe.

Data ethics goes beyond compliance with data privacy laws. We comply with all legal requirements but acknowledge and respect that our use of data (both personal data and non-personal data) may create risks for the users that applicable laws do not cover. We manage these risks by adhering to the principles described below.

## Use of technologies

In Topsoe we use a variety of technologies when processing data.

## Data ethics principles

In Topsoe, we rely on data to provide services and improve product offerings. Topsoe acknowledges that data is a valuable asset and should be treated with sensitivity and respect. Ensuring that appropriate measures are in place to safeguard ethical data processing within the Topsoe Group is a natural part of doing business in Topsoe.

Topsoe has therefore defined seven data ethical principles:

- Transparency: Individuals must be able to understand how their personal data is used.
- Data quality: Decisions must be made based on correct and sufficient data.
- Fairness and non-discrimination: Bias must be avoided, as it can have severe negative implications. Data collection and processing must therefore be unbiased, impartial, and shall correspond to individual needs.
- Autonomy: Respect individuals' privacy, protect their rights, and honour confidentiality.
- Ethics by design: Controls must be built into the architecture to prevent harm and risks to individuals.
- Responsible data sharing: Data must be shared on a need-to-know basis only, and processes for sharing data must actively and consistently consider and protect individual's rights.
- Accountability: Clear governance, effective policies and processes, and continuous training and monitoring are a must. It is important to Topsoe that not only Topsoe but also the companies that Topsoe does business with maintain a high level of data ethics.

## Processes and policies

Topsoe will develop additional policies and procedures to ensure that Topsoe complies with the above-mentioned principles.

## Governance and reporting

Each year Topsoe will account for this policy in accordance with section 99 d of the Danish Financial Statements Act.