



ALK DIVERSITY AND INCLUSION POLICY

1. STATEMENT OF POLICY

At ALK, we are committed to promoting diversity at all levels, by ensuring that all people have equal opportunity to pursue prosperity. We take action to foster diversity and inclusion at all ALK sites. It is our policy to be proactive in our approach, and seek to hire people from varied backgrounds, with unique skills and perspectives.

We prohibit discrimination and harassment, and we will uphold all laws relevant to countering discrimination in all jurisdictions where we operate.

We believe that social progress and prosperity must go hand in hand, and we strive to build a work environment that supports ALK's strategy. Our commitment is guided by UN Global Compact, UN Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights and International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

All employees of ALK are expected to comply with and support the ALK Diversity and Inclusion Policy (the "Policy").

2. PURPOSE AND SCOPE

- a. We are dedicated to conducting business in accordance with our core values and ethical standards as specified in the ALK Code of Conduct. For ALK to cater to the diverse needs of people with allergy, we believe that our workforce needs to be diverse as well. We promote diversity because it is the right thing to do when you need holistic solutions, and because we believe that it is necessary in order to attract top talent, better understand our customers, increase employee satisfaction and improve decision-making. It is not possible for this Policy to describe every principle or practice related to diversity and inclusion, and it is therefore only part of our commitment.
- b. The purpose of the this Policy is to:
 - (a) set forth the respective principles and rules on our position on equal opportunities, harassment, discrimination and inclusion; and
 - (b) provide information and guidance on diversity issues.
- c. The Policy is a supplement to ALK's Code of Conduct and should be read in conjunction with it and other compliance policies and procedures, such as the HR policy, CSR Policy, ALK Communication Policy etc.

3. ROLES AND RESPONSIBILITIES

- a. This Policy applies to all employees of ALK, including all directors, officers, managers, employees and temporary staff worldwide (collectively referred to as "ALK employees"), when acting on behalf of ALK.
- b. The Board of Directors has the overall responsibility for ensuring that this Policy complies with our legal and ethical obligations. Managers at all levels are responsible for implementing this Policy and ensuring that those reporting to them understand and comply with this Policy.
- c. All legal entities/subsidiaries within the ALK Group must comply with the provisions of this Policy, as well as with national laws, regulations, industry standards and codes regarding diversity and inclusion.
- d. At ALK, we aim for a diverse and inclusive work environment where different perspectives, abilities, capabilities, talents and experiences come as one. We respect the fundamental rights of people, and it is the responsibility of all employees to respect each other's differences.

4. PRINCIPLES AND RULES

- a. ALK must provide equal opportunities for all employees.
- b. ALK welcomes everyone determined to make life for people with allergy surprisingly simple, regardless of age, gender, race, ethnicity, religion, disability, sexual orientation, gender identity, personality, tenure, education, economic background, organizational function and more. .
- c. ALK must be an open workplace that fosters a sense of belonging, and where every employee is respected and valued. We believe that by pursuing diversity, we pursue growth, as diverse perspectives pave the way for creative thinking and problem solving.
- d. All decisions regarding recruitment, promotion, hiring, layoffs, compensation and development of ALK employees must be made based on merit.

5. REPORTING POTENTIAL MISCONDUCT

- a. Our reputation in the industry is connected to the responsible behaviour of our employees, our management and our partners. To build a workplace where everyone feels a sense of belonging, and where people's opinions are heard and valued, we need to be one ALK. Therefore, it is the responsibility of all employees to oppose discrimination actively, by reporting any questionable actions, to their immediate manager or a manager at a higher level. No ALK employee will suffer retaliation or any other negative consequence for reporting misconduct or opposing discrimination or harassment.
- b. If an ALK employee feels unable to approach their manager or another higher level manager, advice should be sought from Human Resources.
- c. Finally, all ALK employees are free to use ALK Alertline to report all serious and sensitive concerns, in a confidential manner. ALK encourages employees to identify themselves, but the employee can also choose to file a report anonymously.

6. BREACH OF THIS POLICY

- a. All ALK employees are accountable and responsible for adhering to this Policy. All employees play an important role in maintaining a diverse environment and must treat all colleagues with respect and professionalism.
- b. Breach of this Policy will lead to disciplinary and other actions, up to and including termination of employment.

7. APPROVAL AND REVIEW

- a. This version of the Policy has been approved by the Board of Management and Board of Directors. We routinely refine our approach to diversity and inclusion, and this Policy will be subject to periodic reviews to ensure that its continued relevance. The most recent version will always apply.

Hørsholm, 17 December 2018