

## 2022 Transparency Report

Deloitte Statsautoriseret Revisionspartnerselskab  
Business Registration No. 33 96 35 56  
For the year ended 31 May 2022



Audit & Assurance ●



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Leadership message<sup>1</sup>

# Building better futures

This year has been another year of uncertainty. We made it through the worst of the pandemic and returned to a close to normal work-life again. Then came the conflict between Russia and Ukraine, that created a whole new level of uncertainty. And today, we are facing high inflation rates and economic uncertainty at a time, where we urgently need to act on climate change. For the sake of the next generation and their future.

But it was also a year of celebration! We celebrated Deloitte Denmark's 110-year anniversary and held a number of social gatherings after the pandemic. The importance of celebrating our people, our culture has never been more important than now.

Deloitte's purpose is still to create and impact for our clients, our people and the society we are part of. Our values are our guiding principles that show us how to create results, be inclusive and take care of each other - so we can foster sustainable lives, growth and transformation. This year in particular, the values have served as our moral compass and guided us in making the right decisions in difficult times.

Our most valuable asset is our people. Without our people, there simply is no Deloitte. Some of our people have been under mental pressure after two years of on-and-off lockdown and isolation followed by the senseless war in Ukraine and, for some, increasing workloads or increased stress levels.

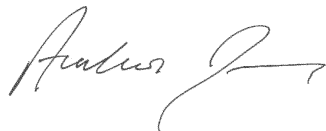
That is why this year, we have increased the possibilities for flexible ways of working through hybrid working, we have initiated a long-term well-being initiative around healthy living and workplace well-being, focusing on nutrition, sleep, exercise, walk-and-talks, virtual meditation and much more.

The diversity agenda is still a must win battle for us and to create an equal playing field, Deloitte introduced a new and improved paternity leave policy this year. By giving mothers, fathers, and co-parents 24 weeks of paid leave, we want to help promote the structural change needed for a more equal distribution of parental leave – not just in Deloitte – but also in society in general.

We continue to serve the public trust and build integrity in Danish businesses with our experienced and innovative audit business. We are proud to have won a prize for the most innovative digital audit solution. And we continue to invest – particularly in our advisory services, so we can continue to drive innovation for our clients and for industries as a whole. This year, we have completed two acquisitions to strengthen our capabilities within SAP. We have also expanded our climate & sustainability practice to double-size to cater for the enormous demand within this area.

Quality and trust will always be at the heart of our business. Quality in technologies and processes, quality in how we deliver to our clients, and quality in how we invest in our culture and our people. Quality also means showing transparency about audits and our profession to continue to build trust in capital markets.

This transparency report shows how Deloitte is organized, our ethical principles and how we ensure a consistent, high quality of our audit and advisory services. Enjoy the read!



Anders Vad Dons, CEO and partner

<sup>1</sup> Deloitte Statsautoriseret Revisionspartnerselskab is the Danish affiliate of Deloitte North and South Europe (NSE) LLP, a member firm of Deloitte Touche Tohmatsu Limited (DTTL), a UK private company limited by guarantee. DTTL – also referred to as Deloitte Global - and each of its member firms are legally separate and independent entities. DTTL and Deloitte NSE LLP do not provide services to clients. Please see [www.deloitte.com/about](http://www.deloitte.com/about) to learn more about our global network of member firms





# Auditing in disruptive times

In recent years the world has experienced a period of exceptional challenges and uncertainty, from the societal changes caused by the COVID-19 pandemic to the humanitarian crisis brought on by the war in Ukraine.

Russia's invasion of this sovereign nation is an indefensible act of aggression that echoes the darkest days in European history. Our overriding concern is the well-being of our colleagues in Ukraine and their families. For the time being, Deloitte has suspended business operations and client service in Ukraine to allow them to focus on their loved ones. We support our people with relocation where needed, including immigration assistance, transport and accommodation, as well as financial and psychological support. On a global scale, Deloitte has committed nearly USD 7 million in financial donations to support the humanitarian needs of those impacted by the war in Ukraine.

After the Russian invasion, we decided to separate our practice in Russia and Belarus from the global network of Deloitte member firms. As a result, Deloitte no longer operates in Russia and Belarus. While we know this is the right decision, it impacts the 3,000 now-former Deloitte professionals in Russia and Belarus who have no voice in the actions of their government.

From a client perspective, Deloitte Denmark has many clients with business operations in Ukraine, Russia, or Belarus. Since the invasion, we have worked very closely with them to support and help them navigate the risks to and impacts on their respective businesses.

These momentous shifts have brought unprecedented speed of change to the profession, and throughout

this period, Deloitte has prioritized the safety and wellbeing of its people. In times of global complexity and economic uncertainty, the need for high quality audit and assurance services is critical. Now more than ever, investors and stakeholders are looking to auditors to bring trust and objectivity to capital markets.

Despite the unique challenges of the current environment, Deloitte Denmark has not wavered in its commitment to ethics, integrity, independence, and transparency—all while serving the public interest. We recognize the importance of upholding our professional responsibilities and our role in instilling trust in the financial reporting ecosystem. We continually reinforce the following principles with A&A practitioners:

- Exercise professional skepticism and due professional care
- Critically evaluate the quality of audit evidence obtained and whether it is sufficient and appropriate to address the risk
- Make well-reasoned professional judgments supported by clear documentation
- Foster a culture of consultation
- Stay connected and support one another

In this period of continued uncertainty, all stakeholders of the financial reporting ecosystem (including governments, financial institutions, entity management, those charged with governance, auditors, and investors) must exercise significant judgment. This includes an awareness of the heightened risk of fraud, the presence of new or different risk factors, and potential

changes in internal control environments. Although the existing accounting frameworks have provisions for uncertainties, financial statement users and regulators should continue to expect a higher degree of market and economic volatility in the near term.

Deloitte welcomes the public statements and guidance issued by regulators that recognize the current uncertainties and emphasize the importance of high quality, forward-looking corporate disclosures. There is benefit to the public for greater transparency from various financial reporting ecosystem stakeholders raising awareness about these issues. This includes providing more clarity on the responsibilities of management, audit committees, companies, auditors, regulators, and other stakeholders.

The professional standards, Deloitte policies and guidance, strong consultation and specialist networks, and steadfast diligence continue to be the basis for Deloitte's execution of high quality audits. Deloitte's global technology and infrastructure have allowed for an agile and rapid response to the various disruptions to the workplace, including the shift to virtual working. Deloitte Global continues to provide firms with globally relevant and locally adaptable audit resources and guidance. These responses have allowed us to continue to reinforce the execution of the Deloitte audit approach throughout this historically challenging period.

The transformation of audit delivery in an increasingly dynamic work environment has led Deloitte to respond to the rapidly changing needs and requirements of the talent landscape. This includes challenging historical working methods and supporting its people in a hybrid working environment.

Going forward, Deloitte Denmark will continue to focus its efforts and provide a consistent audit experience in a way that embraces the evolving expectations of the entities we audit and our people.

## Multidisciplinary model (MDM)

Throughout the Deloitte network, Deloitte's robust multidisciplinary business model (MDM)—consisting of audit, advisory, tax, and consulting practices—is an important contributor to the performance of high quality audits. This unique model purposefully connects Deloitte's great breadth of professionals and practitioners with a profound depth of experience, skills, and specialties to bring stronger insights and high quality services. Auditors increasingly use the work of specialists in a number of areas, including to assist in their evaluation of accounting estimates and fair value measurements. This has been more important than ever as companies' financial statements were required to reflect the uncertainties presented by COVID-19 and ensuing macroeconomic factors. Further, the scope of corporate reporting is expected to grow rapidly in the near future where financial statements and corporate disclosures will continue to become more complex due to new ESG considerations and other focus areas. In addition, as big data utilization becomes more pervasive in line with other digital advances, the demand for data analysts and IT specialists will grow accordingly. Among the benefits of the MDM are:

- Possibility to develop industry or thematic insights (e.g., climate, governance, corporate strategy, etc.) through multiple lenses, which enhances auditors' understanding of business risks relevant to conducting audits.
- Immediate access for the Audit & Assurance practice to specialized resources in other business lines. This promotes audit quality because auditors can leverage the knowledge and experience of advisory practitioners who are skilled in subjects beyond audit and assurance.
- A diverse organization helps attract and retain premier talent.
- Availability of intellectual capital within the network to innovate audit processes, technologies, etc.
- Parts of the business grow at different rates during various time periods across markets. Deloitte's MDM provides a safeguard against market volatility that is important to long-term viability of the network and makes significant investments in audit quality and innovation possible, even in times of financial pressures on the audit business.

Deloitte acknowledges, however, the possibility and perception of conflicts of interest, and therefore has robust independence policies and systems in place to help ensure that Deloitte's strategy is executed in alignment with regulatory and professional requirements. In some areas, Deloitte policies are more stringent than what professional standards or laws or regulations require.

# Environmental, social, and governance (ESG) reportings<sup>2</sup>

The foundations of business are changing rapidly, long-term resiliency and the ability to create enduring value is directly linked to alignment with the values and expectations of society. Market participants and broader stakeholders are calling for greater insight into how an organization is going to build, protect, and enhance enterprise value over time, and are specifically demanding enhanced transparency around ESG impacts and the dependencies of a company's business model and strategy.

There is a growing interest for companies to integrate climate-related and other ESG considerations into internal control policies and procedures, enhancing the maturity of systems, processes, and governance over climate-related and other ESG information. Those charged with governance (e.g., Audit Committees, Boards) are moving toward incorporating ESG considerations in their oversight responsibilities of an organization's management, its reporting readiness, and implementation of processes and controls to collect data.

In response to growing demand, the reporting landscape is quickly changing to meet the needs of stakeholders, with proposed standard setting through the International Sustainability Standards Board and rulemaking around the world. The developments in standard-setting and rulemaking are intended not only to create transparency and consistency in global baseline reporting, but also to make clear that information in financial reporting and information contained in sustainability reporting together are

essential inputs to inform a stakeholders' view of an entity's value.

According to the EU taxonomy regulation, from 2021 all large listed companies have to report in their annual reports to what extent their revenue, CAPEX and OPEX are related to economic activities that could be considered sustainable according to certain specific taxonomies. From the 2024 annual reports, all large companies in the EU are also expected to in their annual reports to have to incorporate comprehensive both textual and quantitative information about the sustainability of their activities in accordance with the EU Corporate Sustainability Reporting Directive (CSRD), which is expected to be incorporated into Danish legislation during 2023.

With the increased focus and scrutiny of this information also comes the increased need for confidence over the quality of the information being disclosed, which may be achieved through assurance over ESG information. Deloitte believes that there is a benefit to ESG assurance being provided by an audit firm. Objectivity, credibility, and integrity are qualities valued most in assurance providers. These are in addition to independence, professional skepticism, commitment to quality, and appropriate training that are equally critical.

Below are specific actions that Deloitte is undertaking to support execution of high quality audits that give appropriate consideration to climate-related risks and opportunities:

- Educating Deloitte professionals on climate change and the impact on audit entities through the deployment of materials such as a climate learning curriculum, a framework and related guidance to consider climate-related matters as part of the audit.
- Engaging in the global debate by being proactive in supporting global sustainability standards, through facilitating the five sustainability reporting standard-setting bodies and contributing to the IFRS Foundation's climate disclosure work and actively participating in various global platforms such as the World Economic Forum and the 2021 United Nations Climate Change Conference (COP 26).
- Creation of a subject matter expert group across the functions Audit & Assurance, Assurance Offerings and Risk Advisory with a view to share knowledge and competencies across professional subject areas and to be able to match the increased request from companies for a holistic approach to the ESG agenda and the derived voluntary and statutory reporting requirements.
- Active participation in national forums under the auspices of the Danish Business Authority and the Danish Auditors Association to share knowledge and to influence current and future EU and Danish regulation in the area of sustainable reporting, including in particular the upcoming Corporate Sustainability Reporting Directive (CSRD) and the underlying European Sustainability Reporting Standards (ESRS), which are expected to become a requirement for the largest companies in the EU from the financial year 2024.

Deloitte supports the continued collaboration of all participants in the financial reporting ecosystem, working together to develop and implement common standards upon which to measure, disclose, and ultimately assure ESG information.

Further, to help the world achieve the goals of the Paris Agreement, Deloitte has launched WorldClimate, a strategy to drive responsible climate choices within the Deloitte network and beyond.

**Information and cyber security**  
Information security controls are a core element of our workplace culture. We continually reinforce and communicate our information security policy to ensure that all our people maintain a clear understanding of what is expected of them and how we protect their rights to privacy and confidentiality. During the past year, we have maintained a very high focus on cyber security. This focus has become only more pertinent as we have seen a significant increase in cyber attacks against Western targets since the war broke out in Ukraine.

For the second year, we have run our extensive cyber culture programme. Within the programme, we have had campaigns and mandatory e-learning that covered a broad array of security areas, including data security and how to spot phishing e-mails, phone calls and texts. We also held Cyber Security Awareness weeks where we focused on different ways of staying cyber secure, focusing particularly on the risks involved in working remotely.

In FY22, we updated and reinforced our risk control systems and – after passing both internal and external audits – we had our Nordic ISO27001 certification renewed. The certification demonstrated our commitment to running a responsible business while keeping our data and clients' data safe. Being ISO 27001-certified allows us to guarantee our clients and people that we will always treat their data in a secure, responsible, and appropriate manner. This certification allows us to protect our brand, image, and business.

<sup>2</sup> For more information about Deloitte's alignment with ESG, please refer to [Deloitte Global Impact Report](#).

# Deloitte network

### Deloitte Denmark: legal structure and ownership<sup>3</sup>

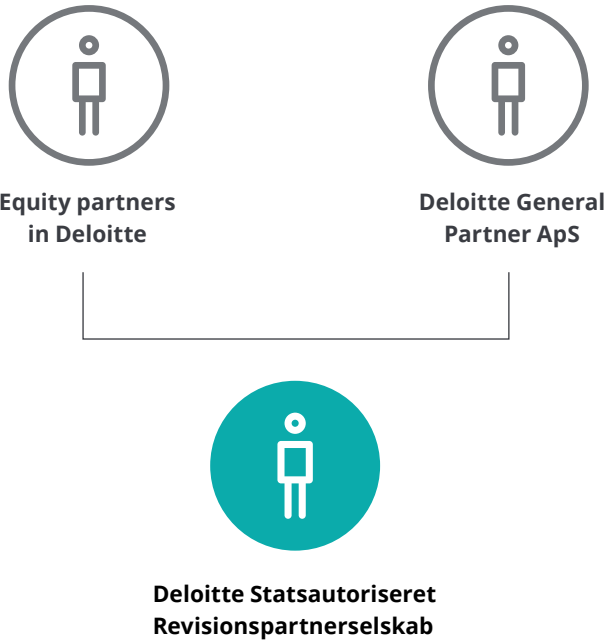
Deloitte Statsautoriseret Revisionspartnerselskab is connected to the Deloitte network through Deloitte North and South Europe (NSE) LLP, a member firm of Deloitte Touche Tohmatsu Limited. Deloitte Statsautoriseret Revisionspartnerselskab is referred to throughout this report as “Deloitte Denmark”, and Deloitte North and South Europe (NSE) LLP is referred to throughout this report as “Deloitte NSE”. Deloitte NSE holds practice rights to provide professional services using the “Deloitte” name which it extends to Deloitte entities within its territory, including Deloitte Denmark. Deloitte Denmark is authorised to serve as an auditor for clients in Denmark and Greenland.

As of today, Deloitte NSE consists of the former member firms in UK, Switzerland, Ireland, Belgium, Holland, Norway, Sweden, Finland, Iceland, Italy, Greece, Malta, Libya, Egypt, Palestinian Ruled Territories, Lebanon, Jordan, Saudi Arabia, Iraq, Kuwait, Bahrain, Qatar, UAE (United Arab Emirates), Oman, Yemen, Cyprus and Denmark. The firms mentioned operate as separate independent legal entities and provide services in their respective countries in accordance with professional standards. Deloitte NSE is registered in UK and Ireland through the Institute of Chartered Accountants in England and Wales, but does not provide services to clients.

### Ownership structure in Deloitte Denmark

The main activity in Deloitte Denmark is to deliver audit and advisory services in Denmark and Greenland within the limits of the auditor legislation.

Deloitte General Partner ApS acts as general partner and is owned by Deloitte NSE.



### Network description

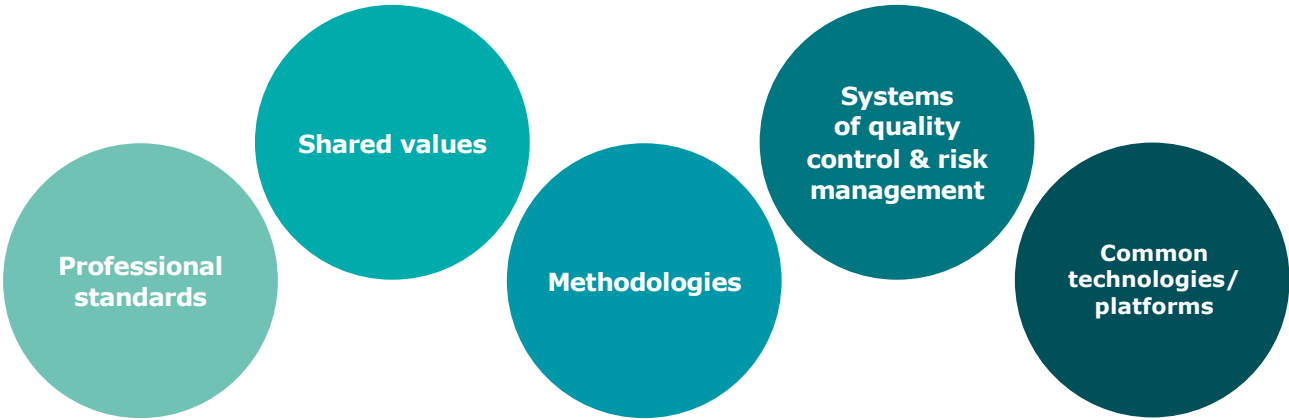
The Deloitte network (also known as the Deloitte organization) is a globally connected network of member firms and their respective related entities operating in more than 150 countries and territories across the world. These separate and independent member firms operate under a common brand.

### Deloitte Touche Tohmatsu Limited (DTTL or Deloitte Global)

Deloitte Touche Tohmatsu Limited is a UK private company limited by guarantee incorporated in England and Wales. DTTL serves a coordinating role

for its member firms and their related entities by requiring adherence to policies and protocols with the objective of promoting a consistently high level of quality, professional conduct, and service across the Deloitte network. DTTL does not provide professional services to clients, or direct, manage, control, or own any interest in any member firm or any member firm’s related entities.

For more information about the Deloitte network, please see: [About Deloitte](#).



<sup>3</sup> Article 13 of Reg. 537/2014 requires: EU transparency reporting requirement: description of the legal structure and ownership of the audit firm.



Deloitte Denmark

# Governance – leadership in action<sup>4</sup>

**Objective**

The leadership structure in Deloitte Statsautoriseret Revisionspartnerselskab is established to comply with the requirements of the Danish Companies Act and to support an active and involving partnership.

**Equity partners**

Deloitte Statsautoriseret Revisionspartnerselskab is a partner company whose ultimate owners are the Danish equity partners. The equity partners have influence on overall decisions like policies, strategies and action plans. This influence is implemented informally through the equity partners' daily work in the Company and through discussions with the Company's Board, CEO and Executive team. Formally, the influence is implemented through partner meetings and at the Company's general assembly.

Additionally, the equity partners will be able to influence decisions through formal roles in the Board and the Executive team.

**Partner Council**

The equity partners elect five equity partners to form the Partner Council. The Partner Council oversees and ensure fairness in the Danish partnership.

**Board**

The Board consists of seven members among which four are appointed by the equity partners. 1 member is appointed by Deloitte NSE LLP. All five are elected at the Company's general assembly, and two are elected by the employees. Three of the seven members are state authorised public accountants or statutory auditors.

**CEO**

The CEO is Anders Vad Dons who is in charge of the daily management of Deloitte Denmark in accordance with the policies, strategies and action plans developed in cooperation with the Company's equity partners and approved by the Board.

**Executive team**

The CEO has established an Executive team to support him in the daily management of the Company. In addition to the CEO, the Executive team consists of the Heads of the five business units, Clients & Industries, Private, Talent, Risk & Reputation, and the COO. The Executive team meets regularly to implement the approved policies, strategies and action plans

Our purpose and commitment:  
instilling trust and confidence



At Deloitte Denmark, our purpose is to make an impact that goes beyond the expected. For Audit & Assurance, this means a constantly evolving audit and assurance process, leveraging leading-edge technology, applying a diversity of skillsets, knowledge, and experience to deliver high quality services. We take great pride in instilling confidence and trust in the capital markets and are committed to relentlessly raising the standards of quality and always acting with integrity, independence and transparency. We are continuously building our capabilities to support the delivery of high quality audits and other assurance engagements and making leading contributions to shaping the future of the audit profession.

<sup>4</sup> Article 13 of Reg. 537/2014 requires: EU transparency reporting requirement: a description of the governance structure of the audit firm.



# Executive team



Anders Vad Dons  
CEO



Camilla Kruse  
Head of Talent



Morten Storm Ry  
COO



Christian Schelde Jensby  
Head of Clients & Industries



Henrik Wellejus  
Head of Audit & Assurance



Niels Josephsen  
Head of Tax & Legal



Martin Søegaard  
Head of Consulting



Jens Lundgaard Simonsen  
Head of Risk & Reputation



Bjørn Winkler Jakobsen  
Head of Private



Sigurd Ersted Jensen  
Head of Financial Advisory



Mette Louise Kaagaard  
Head of Risk Advisory

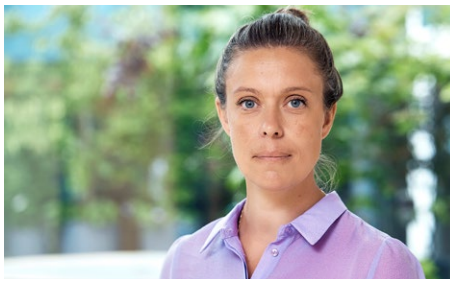
# Board



Gustav Jeppesen  
Chairman



Jesper Smedegaard Larsen



Mette-Katrine Hviid  
Elected employee board member



Therese Kjellberg



Lars Kronow



Michel Denayer



Nidja Rizwan  
Elected employee board member

# CEO

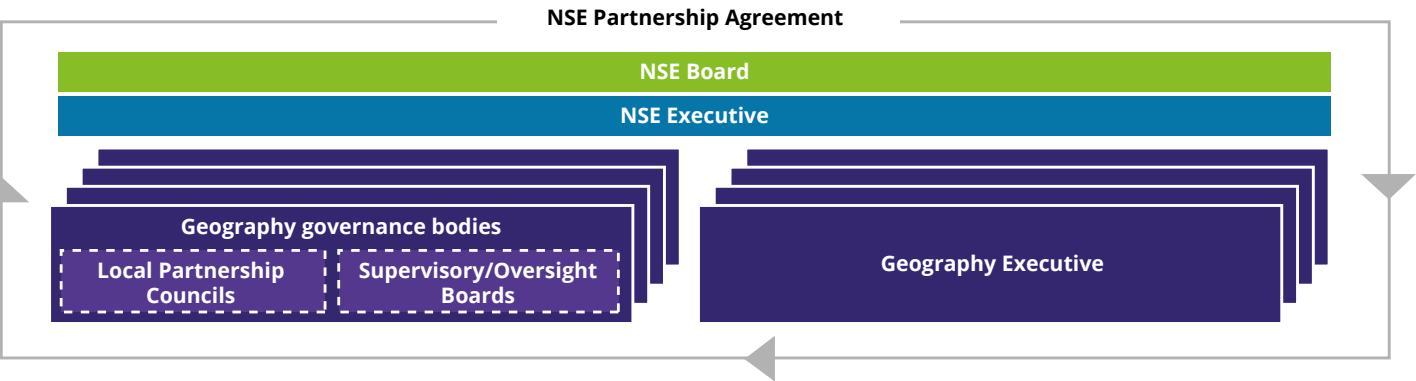


Anders Vad Dons  
CEO

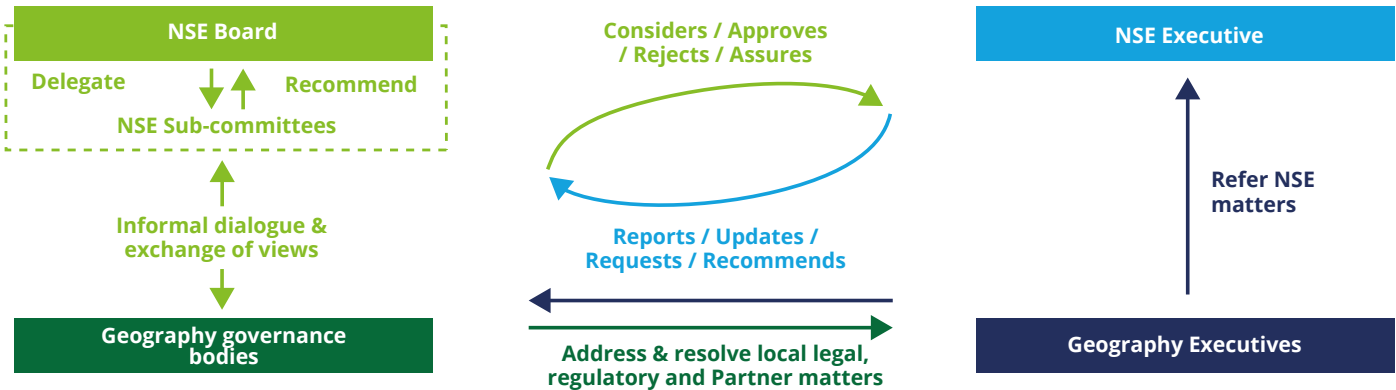


# NSE Governance

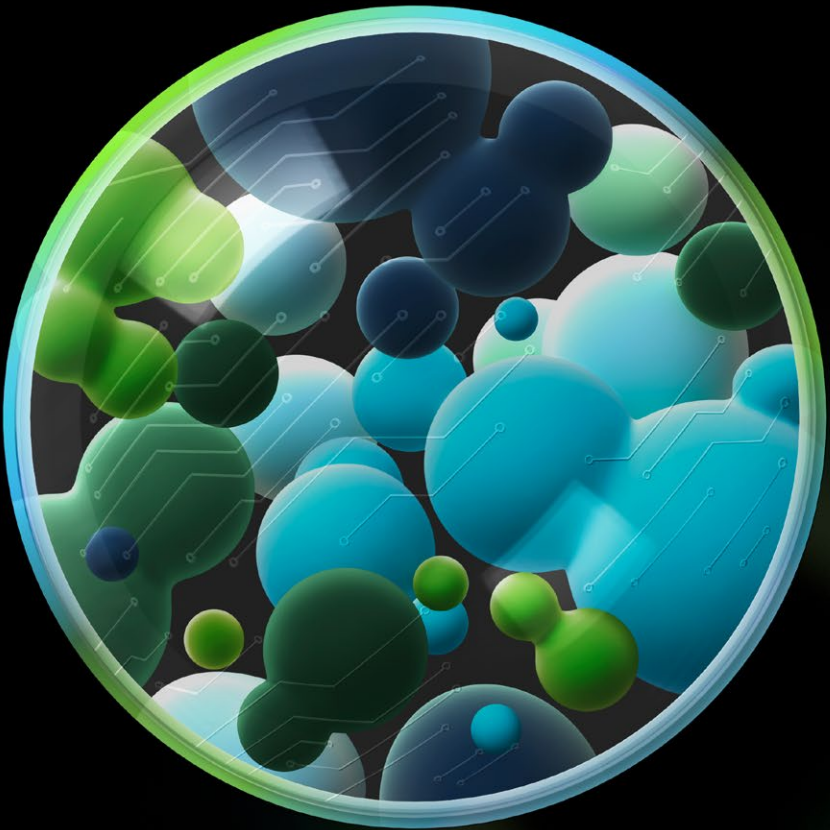
The Deloitte NSE governance structure consists of the NSE Board, NSE Executive, Geography governance bodies and Geography Executive, underpinned by the NSE Partnership Agreement as set out below:



- The **NSE Partnership Agreement** underpins the governance of NSE
- The **NSE Board** is the primary governance body of NSE, responsible for ensuring high quality governance and stewardship of NSE. The NSE Board works with the NSE Executive to set and approve the long-term strategic objectives of NSE and the markets in which it operates. The NSE Board comprises the NSE CEO, NSE Chair and elected members, as well as Independent Non-Executives (INEs) and a Deloitte Global Representative. The latter does not have voting rights
- The **NSE Board** Board oversees the risk appetite in each business area; is responsible for the oversight of the Executive function, ensuring alignment with Deloitte Global obligations; and is responsible for the promotion and protection of NSE Equity Partner interests generally
- The **NSE Executive** is responsible for developing the NSE strategy and vision as well as NSE policies, and overseeing their implementation and execution
- **Geography governance bodies** exist where this is required for legal and/or regulatory purposes and to oversee local Partner matters
- The **Geography Executive** works with the NSE Executive to reflect the Connected+ Autonomy operating model (balancing local and central requirements), including the development and delivery of approved plans, in line with the NSE strategy, tailored to reflect local market conditions.



## Deloitte's priority focus on audit quality



Deloitte's commitment to audit quality is central to everything we do. We continually deliver on this commitment by instilling a culture of quality and excellence across the network, establishing business and financial priorities, and developing effective processes, tools, and technologies applied in the execution of audits. Deloitte's brand is defined by the high quality audits delivered and by the unwavering commitment to continuous improvement of our systems of quality control. Making sure audit quality keeps pace with emerging economic, business, and regulatory conditions, as well as technological advances, is critical to the continual enhancement of Deloitte's role in protecting the public interest and supporting the effective functioning of the financial ecosystem. Deloitte's brand is defined by the high quality audits delivered and by the unwavering commitment to continuous improvement.

# What Deloitte Audit & Assurance brings to capital markets

### A focus on audit quality

Deloitte's commitment to audit quality permeates everything we do. The independent audit is a central element of the financial reporting ecosystem, in place to protect investors and other stakeholders, as well as to promote the effective functioning of the capital markets. Deloitte is keenly aware of our obligation to deliver audit services that meet the challenges and complexities of the current environment, while complying with professional and regulatory standards. For the financial reporting ecosystem to function as intended, it is vital that the auditor's role be executed effectively.

Deloitte is committed to doing more than simply meeting regulatory requirements and conforming to expectations. Deloitte is going beyond the expected to set the standard of excellence for the profession. In keeping with that objective, our commitment to audit quality is unequivocal.

### Deloitte Global leadership

The Deloitte Global Audit & Assurance Executive is led by Jean-Marc Mickeler, the Deloitte Global Audit & Assurance Business Leader, whose responsibilities include developing and driving Deloitte Global Audit & Assurance strategy, with a priority focus on quality:

- Setting the standard for audit quality and approving audit policy and methodology changes with the objective of enhancing audit quality across the Deloitte network.

- Driving key audit quality initiatives and policies across the Deloitte network.
- Leading transformational initiatives to innovate the way our audits are executed to meet the evolving needs of our stakeholders.

### Entities Deloitte audits

As part of Deloitte's Audit & Assurance commitment to supporting the capital markets, we are focused on auditing entities where it serves the public interest and where we have the capabilities to perform a quality audit with objectivity and in compliance with applicable professional standards and laws and regulations, including those relating to ethics and independence.

Deloitte Denmark has detailed policies and procedures in place for the acceptance of prospective clients, the continuance of existing engagements and the assessment of engagement risk. These policies and procedures are designed with the objective that Deloitte Denmark will only accept or continue with engagements where it:

- Is able to perform the engagement and has the capabilities, including time and resources, to do so.
- Can comply with all relevant professional standards and laws and regulations, including those relating to ethics and independence and conflicts of interest assessments and considerations.

- Considers the client's management team to act with integrity and in alignment with our shared values.

The clients we keep are an important aspect of our Audit & Assurance strategy and global shared values that guide our behavior to lead the way, serve with integrity, take care of each other, foster inclusion and collaborate for measurable impact. The question we ask ourselves is: what type of entities do we, as a global network, want to be associated with? In order to answer this question, an audit and assurance risk appetite statement has been developed to serve as the foundation for the company we want to keep. The risk appetite statement can be used as a tool to promote robust discussion of risk, and as a basis upon which acceptance and continuance decisions can be debated and challenged effectively and credibly. The statement, as shown below sets the tone for the risk culture and aims to drive global consistency in the engagement acceptance and continuance decision making process:

"Deloitte's Audit & Assurance (A&A) portfolio risk appetite underpins our purpose led agenda and reinforces our Principles of Business Conduct, which articulate the standards to which we hold ourselves, wherever in the world we live and work, in order to build and maintain a sustainable business for current and future generations.

Consistent with our commitment to purpose and to act in the public interest, we

recognize that taking on a degree of risk is a natural consequence of doing business. In order to deliver high quality audit and assurance services, we proactively identify and manage risk through our quality control processes, policies and procedures to make informed decisions aligned to our strategy and values.

We aspire to have a portfolio of clients that aligns with our shared values, respects our professionals, recognizes emerging issues and societal responsibilities, and is committed to providing transparency to stakeholders in the financial reporting ecosystem. We endeavor to have a portfolio that does not include clients that lack integrity, engage in illegal activities, disregard the authenticity of financial accounting and reporting, or are unwilling to establish and maintain sufficient internal controls and related processes."

### Fewer, stronger member firms

Within the Deloitte member firm structure, Deloitte Denmark is part of the Deloitte NSE member firm. As a locally registered and regulated audit firm in Denmark, we have decision-making authority regarding regulatory matters and professional obligations and maintain ultimate responsibility for the execution of audit and assurance services in accordance with local laws and regulations. As part of a combined member firm within the Deloitte network, we work in close cooperation with the other geographies in North and South Europe member firm and benefit from additional oversight of quality, risk management, and monitoring activities. This structure fosters shared investment in audit innovation and resources as well as the sharing of leading practices across geographies, contributing to our collective aspirations of continuous improvement in audit quality.

### Audit & Assurance – the future, today

At Deloitte, meeting expectations is where our Audit & Assurance services begin.

Our people's commitment to integrity, to serve the public interest, and to deliver high quality assurance over the areas that matter most to our stakeholders is at the core of everything we do.

We are leaders in quality and will continually deliver on this commitment by focusing on excellence across people, process, and technology. Each of these core components helps us to deliver our vision for a better future, creating an impact that not only meets expectations but goes beyond them.

What does this look like? A constantly evolving audit and assurance practice, leveraging bright minds, effective processes, and world-class technologies from across our global organization while drawing on our years of experience. We deliver high quality services in an efficient and effective way that upholds integrity, builds confidence, and drives value by focusing on what really matters.

Audit & Assurance transformation is an important shift across the network in the way Deloitte practitioners work and includes:

The Deloitte Way: standardisation of audit processes supported by global technology suite	Real-time audit quality monitoring
Enhanced talent model which includes learning, rewards and recognition, centres of excellence, and delivery centres	Agile deployment of tools and technologies to respond to changing environments



**Delivering audit excellence through process, people, and technology transformation<sup>5</sup>**

With The Deloitte Way, Deloitte is bringing innovation into the core of how our audits are executed: with automation that improves routine tasks, analytics that yield a deeper and more insightful view into the data, and artificial intelligence that enhances human discovery and problem-solving. As a result, we are improving the quality of the audits we deliver while also creating a richer talent experience for our people and giving clients a streamlined, digital audit experience, that provides more transparency and deeper insight.

Innovation and technology enablement are an expectation in today's fast-changing business environment, and this expectation holds true for the audit profession as well. Today's complex business environment requires that the audit be dynamic, multidimensional, and insightful. There is a demand for real-time, relevant information, and we need to evolve our audits as the entities we audit innovate their businesses and processes. Leveraging evolving technology and data, Deloitte A&A delivers deeper insights to create more consistent, transparent, and valuable audit and assurance for our stakeholders. Deloitte brings bright minds, effective processes, and world-class technologies from across the global organization to deliver an impact beyond expectations.

Deloitte Denmark auditors are enhancing procedures by making more use of data-driven analytics, as well as cognitive and cloud-based technologies like Artificial Intelligence (AI). This is due, in part, to the increased automation and effectiveness these provide, but also the need for Deloitte

Denmark to stay abreast of technological advances used by the entities that we audit.

Deloitte is committed to the continued investment in emerging technologies and diversity of thought that enables the delivery of enhanced quality, insights, and value to our clients and the markets. Deloitte's holistic global audit platforms, Deloitte Omnia and Deloitte Levvia, demonstrate our commitment to delivering digital, high quality audits of all sizes and levels of complexity. Deloitte Omnia is our cloud-based, end-to-end audit delivery platform for larger audits, including publicly-listed entities, while Deloitte Levvia delivers a streamlined, right-sized digital audit experience for less complex private entities. Ongoing development, enhancement, and broader deployment of both platforms will continue over the next several years. Deloitte also has designed an innovative global data and analytics solution, and our integrated suite of enabling innovation technologies are all connected in the cloud.

Furthermore, Deloitte Denmark has also deployed a range of innovative, cloud-based global audit tools and technologies such as:

- Spotlight - our integrated data analytics engine that delivers audit analytics and valuable insights directly into the hands of the auditor.
- Deloitte Connect – our secure, online collaboration site that facilitates a two-way dialogue between the Deloitte team and client team to effectively manage engagement coordination.
- Icount – our mobile and web-based application that streamlines the inventory count process from start to finish.

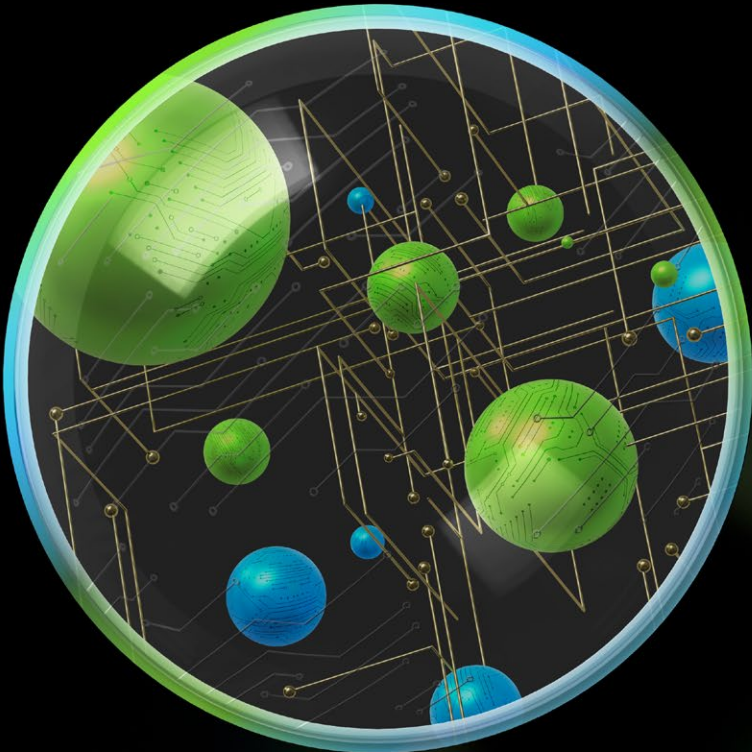
- European Single Electronic Format (ESEF) Validation Tool and workpapers supports the validation and audit procedures related to the auditor's opinion on whether the annual reports for listed entities are prepared in compliance with ESEF regulation.

Furthermore, Deloitte Denmark has invested significantly in locally developed innovations and platforms to improve our business operations and market offerings, including:



- FACT – our award winning (Danish Digital Awards 2022 Gold winner), internally developed, financial statement preparation tool in the cloud to optimize our production of annual reports and taxable income statements for our clients.
- Deloitte Direct – our digital client collaboration platform and integration engine embedding new value adding, digitally-enabled services and market offerings.
- 42 Deloitte – our new self-service Audit Analytics and Business Intelligence platform used by both auditors and clients.

# Shaping the future of the audit profession



**The provision of relevant and reliable financial and, increasingly, non-financial information is critical to both the capital markets and broader society. Policy makers, regulators, investors, company directors, audit committee chairs, and auditors all have an important role so that users of corporate information have a clear and complete picture of uncertainties and risks in a company's business model to help support their informed decision making.**

**Uncertainty and complexity are set to remain a central theme over the coming years, driven by heightened global challenges and the rapid advancement of technology.**

**Deloitte is committed to establishing a meaningful vision for the future of the profession which addresses the shifting needs of society. We are proactively engaging with a range of stakeholders to bring innovation into the audit of today—as well as the audit of tomorrow—to support the audit, corporate governance and reporting regime in continuing to serve their purpose to enable confidence and trust.**

<sup>5</sup> For more information about Deloitte audit innovation, please refer to [Deloitte Global Impact Report](#).



# Professional development and performance management



Deloitte’s culture of excellence and the design of learning programs place people at the forefront. Deloitte practitioners are technically proficient with high levels of ethics, integrity, professional skepticism, and objectivity, applying their judgment and experience with passion and commitment. We are continuously enhancing our skillsets, knowledge, and experience to go beyond the expected and deliver meaningful impact.

Deloitte is committed to delivering an unrivalled talent experience, developing practitioners, and furthering their careers by creating a life-long learning environment—advancing audit & assurance capabilities and skills as well as flexible career options that appeal to auditors of today and tomorrow.

Deloitte practitioners bring diverse backgrounds, knowledge, and skillsets that enhance capabilities as an organization in delivering the highest quality audits. Deloitte is united in the commitment to our ALL IN program dedicated to improving diversity, equity, inclusion, and innovation.

In addition, operational discipline, effective management of the business, and the development of a singular approach to doing audits known as The Deloitte Way, provide the foundation for Deloitte’s commitment to bring global consistency to our audits.

Deloitte is driving a sustainable audit and assurance business that recognizes and rewards its people and makes ongoing investments in their future.





Learning and development initiatives<sup>6</sup>

Deloitte's transformed approach to audit delivery is changing the experience for our practitioners. Our teams are empowered by advanced tools and technologies and more extensive use of data and analytics within a guided workflow to execute the end-to-end audit. For Deloitte practitioners, this means focusing on how the engagement is planned, executed, and managed consistently across the globe using forward-looking techniques and capabilities. It also offers opportunities to enhance their technical and professional skillsets and competencies. For example, the following skills remain as important as ever—enhanced data analytics, project management, critical thinking, communication, professional judgment, and the application of accounting and auditing principles to work more effectively and deliver high quality engagements. As capabilities and skillsets are enhanced, we build greater confidence and become ever-better evaluators of risk.

Deloitte has made substantial investments in talent and learning strategies and transformed the technical audit curriculum to build the refreshed skillsets and proficiency required by level:

- At the core, Deloitte has a single, global mandatory audit technical learning curriculum, tailored for learners by level, using a dynamic blend of live instructor-led, digital on-demand courses, and on-the-job activities.
- All client service practitioners are required to complete at least 20 hours of continuing professional education (CPE) each year and at least 120 hours every three years, through structured, formal learning programs, such as internal or external courses, seminars, or e learning covering all areas of the competency model

(e.g., leadership capabilities, professional capabilities and technical/specialized capabilities).

- All client service practitioners have clearly defined role expectations and global Talent Standards which outline the capabilities that are required of practitioners at each level.

Deloitte has also established specific learning opportunities for specialists working on audit engagements to support their knowledge and understanding of the audit process. In addition, our assurance learning offering is being expanded to respond to emerging business needs.

The objective of the Deloitte Denmark professional development program is to help partners and professionals maintain and enhance their professional competence and ensure consistency of audit execution. To supplement on-the-job development, Deloitte Denmark provides formal continuing professional development programs in relevant subject areas consistent with the Deloitte Global Audit & Assurance Curriculum.

Deloitte University

Deloitte actively cultivates the collective knowledge and skills of Deloitte people globally through continued investment in Deloitte Universities (DU). These are state-of-the-art learning and development centers focused on Deloitte culture and founded in the principles of connectedness and leadership in a highly inclusive learning environment<sup>7</sup>.



<sup>6</sup> EU transparency reporting requirement: a statement on the policy followed by the audit firm concerning the continuing education of statutory auditors

<sup>7</sup> For more information about Deloitte Universities, please refer to Deloitte Global Impact Report.

Audit & Assurance (A&A) Leadership appointments

Critical A&A leadership roles are clearly defined. A role profile and key performance indicator framework provide a basis for consistent leadership appointment and evaluation across the Deloitte A&A network and align member firm and Deloitte Global A&A strategic objectives. Deloitte has introduced globally consistent standards for member firm A&A leaders, including A&A Business Leaders, A&A Quality Leaders, and A&A Risk Leaders through clearly defined roles, responsibilities, and expected success outcomes. These inform objective setting and evaluation processes and reinforce Deloitte's culture of quality and excellence. Robust monitoring of succession planning helps ensure Deloitte is developing and appointing the appropriate individuals with the capabilities to achieve these consistent standards.

Remuneration<sup>8</sup>

Execution of high quality audits is expected from all practitioners and is embedded across the Deloitte network. Audit quality is recognized through reward and recognition programs and is built into performance standards at every level, against which practitioners' overall evaluations are measured.

In accordance with global policies, Deloitte Denmark's partners are evaluated on a yearly basis, and depending on the outcome of the evaluation, the remuneration of partners may increase or decrease. Specifically, partner evaluations take the following factors into account:

**Quality:** Uncompromising quality in all professional work

**Risk:** Consistent and strong contributions across all areas of risk

**Performance:** Strong performance against key metrics and objectives

**Leadership:** Demonstration of strong leadership skills and partner behaviours which reflect the organisation's culture

**Clients:** Client portfolio managed and roles performed

**Business:** Shaping and delivering on the firm's strategic and financial plan

**People/Talent:** Contributions across all aspects of talent management, including people development, coaching and mentoring

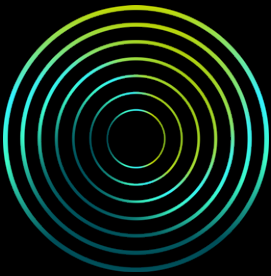
**Stewardship:** Thought leadership, innovation and brand protection roles

**Collaboration:** Working across the firm and being inclusive of other partners and our people.

Social Impact

Making an Impact Every Day

We believe human connection can help create innovation solutions and lasting impact on pressing issues of our time. By harnessing the collective power of Deloitte's network of people, clients, nonprofits, and communities, we aim to achieve lasting social impact for the greater good.



<sup>8</sup> EU transparency reporting requirement: information concerning the basis for the partners' remuneration in audit firms.

Attraction and retention

The current environment for talent is extremely competitive and attraction and retention of our people is a strategic priority for Deloitte. We acknowledge the challenges our people are facing and recognize our part to re-establish the connections that so many have missed. Deloitte is focused on transforming the A&A talent experience, including reimagining the ways of working to improve retention and further advance the diversity, equity, and inclusion (DEI), and wellbeing of Deloitte people. We are looking at opportunities to collectively expand the talent experience. This focus on our people and retention of top talent enhances Deloitte’s ability to deliver high quality audits.

Despite the challenges, Deloitte has again received the award for the World’s most attractive professional services employer from Universum in 2021.

Leadership commitment and tone at the top

Deloitte’s culture of quality and excellence begins with strong tone from the top, starting with senior leadership through to the leaders in all our offices and audit engagements. Deloitte’s focus on audit quality is evident through the direct involvement of leaders and consistent messaging that reinforces the importance placed on audit quality. Deloitte’s relentless pursuit of quality defines not just what we do, but who we are.

System of quality control

Deloitte believes an effective system of quality control is crucial for the consistent performance of high quality audit engagements and we continue to make significant investments in the people, processes, and technologies that underlie Deloitte’s quality control processes.

Regulators and standard setters in Denmark and globally are also focused on driving further improvements in firms’ systems of quality control. In December 2020, the IAASB released its new, revised suite of quality management standards, including International Standard on Quality Management 1



(“ISQM 1”). Systems of quality management in compliance with ISQM 1 are required to be designed and implemented by 15 December 2022, and an evaluation of the system of quality management will be required to be performed within one year following that date.

The effective implementation of ISQM 1 is a key element of Deloitte’s global audit quality strategy. Deloitte Denmark’s ISQM 1 implementation activities are well progressed, building on the multi-year investments and commitment already delivered to go beyond the requirements of the existing professional standards. Deloitte Denmark continues to work with leaders across the firm, as well as the broader network, to further enhance our proactive approach to managing the quality of engagements performed—identifying and addressing risks to audit quality and driving continued advancements in quality control processes that will serve us well into the future as the environment within which we operate continues to evolve and become increasingly complex.

Consistent with Deloitte’s culture of continuous improvement and innovation, these standard setting activities provide the opportunity to challenge ourselves—examining those areas where we can further support and transform the system of quality control. Audit quality is always front and center, and robust audit quality monitoring and measurement processes play an integral role in our ability to continually improve.

Independence, objectivity, and professional skepticism

The execution of high quality audits requires independence, objectivity, and professional skepticism. This means a continuous and tangible focus on Deloitte’s critical role in serving the public interest, including creating a culture of quality where doing the right thing is of paramount importance. Deloitte consistently reinforces the important role of auditors as independent evaluators who must maintain a

mindset of professional skepticism throughout the conduct of our work. This approach to the audit is reflected in Deloitte policies, methods, procedures, and learning, and is reinforced through quality control and accountability measures.

Audit approach

Deloitte’s approach to a high quality audit involves an audit methodology, common across the Deloitte network, supplemented by audit tools for use by our practitioners to plan, perform, supervise, review, document, conclude, and communicate the results of each audit. Deloitte’s audit approach is underpinned by professional standards and requirements under applicable laws and regulations.

This audit methodology is dynamic—it evolves continuously to keep pace with the changing demands of investors, companies, and other stakeholders. It recognizes that advances in the availability and management of large data sets and in statistical science are relevant to continuing to enhance the quality of Deloitte audits.

Deloitte audit methodology is risk-based, focusing on the financial statement account balances, disclosures, and underlying assertions that have a reasonable possibility of being materially misstated.

Processes to support Deloitte practitioners in the execution of high quality audits

The resources applied by Deloitte practitioners in the performance of their audits include the proprietary tools, guidance, materials, and practice aids used in conducting audits, which are available to all our practitioners in the Deloitte Global Technical Library, an extensive online library, and in our audit execution platforms. Deloitte regularly issues accounting and auditing guidance to our practitioners and communicates developments that should be factored into audit risk assessments and responses in order to maintain and drive quality audit execution.

Consultation

Quality and risk management considerations are integral to Deloitte’s audit business. That is why Deloitte views consultation as an essential, collaborative process—one that helps determine the most appropriate answers to complex questions. Deloitte has identified circumstances where consultation outside of the engagement team is required in order to demonstrate an appropriate level of professional judgment and challenge. Deloitte consultation policies require that conclusions are documented, understood, and implemented. Foundational to the effectiveness of the consultation process is Deloitte’s investment in consultation resources who have the appropriate skills and expertise. In addition to formal consultations, whenever engagement partners and teams need additional information or perspectives, they are encouraged to seek assistance from the Audit Quality team, or others in the organization with specialized knowledge.



Deloitte Conditions for Success (DCS)

Deloitte’s commitment to audit quality is reflected in the DCS, five fundamental operating principles critical to the execution of high quality audits and effective risk management. Global DCS benchmarks provide firms with a baseline for measuring progress and driving improvements in these key areas and are monitored on an annual basis.



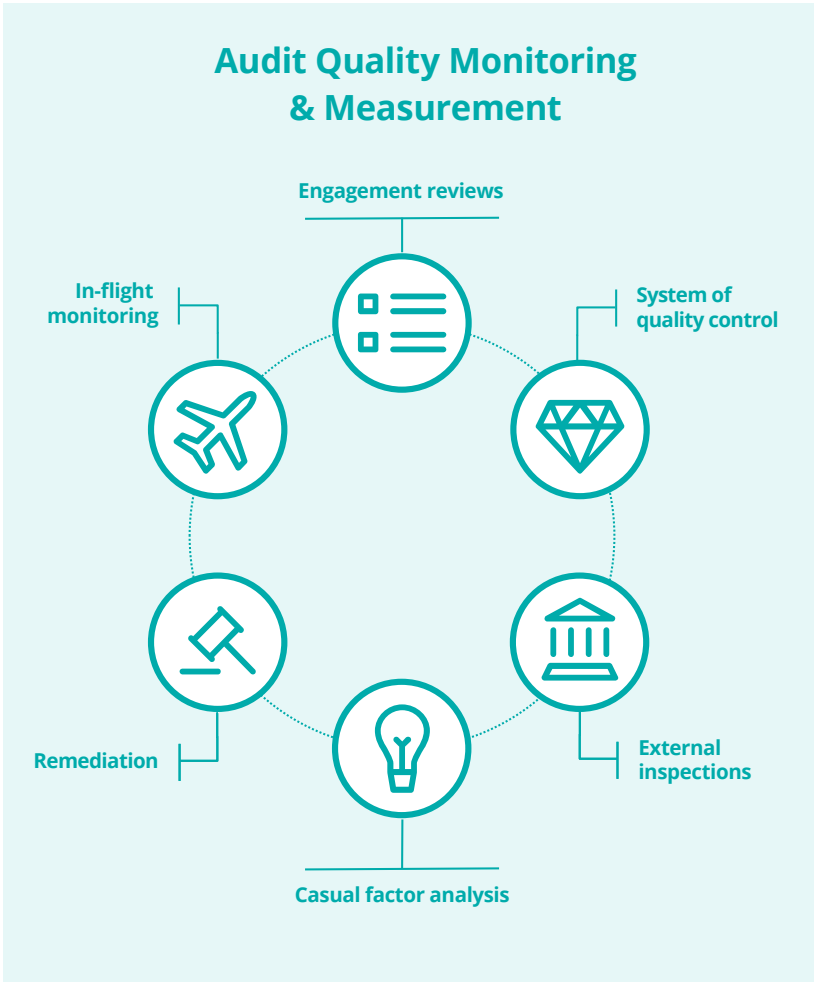
# External and internal audit quality monitoring

### Audit Quality Monitoring & Measurement

A continued focus on audit quality is of paramount importance to the Deloitte brand. It is critical that a Deloitte audit is consistently executed and of high quality, wherever in the world it is performed.

The objective of the Deloitte Global Audit Quality Monitoring & Measurement (AQMM) program is to communicate relevant, reliable, and timely information to leadership in order to enable swift responsive remedial actions and continuous improvement in Deloitte’s system of quality control. This includes the identification of deficiencies and good practices in the system of quality control and the assessment of the effectiveness of remedial actions in driving improvements in audit quality.

Deloitte Denmark maintains policies and procedures to promote an internal culture based on the recognition that quality is the number one priority. Deloitte Denmark focuses on professional excellence as the foundation for achieving audit quality on a consistent basis.



### In-flight monitoring

Continuous audit quality monitoring by Deloitte Denmark involves the proactive identification of audit issues on in-flight engagements in order to drive timely solutions and real time corrective actions. This is achieved through the following suite of activities:

- Deployment and monitoring of a series of core diagnostics, enabling engagement partners and teams, as well as Deloitte Denmark audit quality leader(s) to continuously monitor audit quality and take immediate action.
- A program of subject matter specific “health checks” to assist Deloitte Denmark audit quality leader(s) in assessing progress and identifying potential issues on in-flight engagements.
- In-flight monitoring results are evaluated overall to determine whether additional communication and support is needed for audit engagement teams with respect to adherence to the audit methodology or updates thereto.



### Engagement reviews

Key components of engagement reviews (internal practice reviews) include:

- Risk-based engagement selection and consideration of all major industries served by Deloitte Denmark.
- Mandatory moderation panel to drive consistency in findings and engagement ratings.
- External partners and deputies, independent of Deloitte Denmark, who provide oversight over the firm’s practice review programs to drive global consistency.
- Identifying appropriate resources (from within

Deloitte Denmark as well as from other Deloitte geographies) with the right experience and industry knowledge, including establishing central review teams.



### System of quality control (SQC) review

SQC review includes numerous elements such as documenting key areas of the SQC processes and procedures and performing operating effectiveness testing of the SQC, including execution of a comprehensive SQC review program. Testing of the SQC is an integral part of the firm’s monitoring activities

Audit Quality Indicators (AQIs), including the Deloitte Conditions for Success (DCS), are used in conjunction with other metrics to further assist Deloitte Denmark in developing and monitoring audit quality action plans and reporting on the progress in its audit quality journey.

In addition, proper timing and sequencing of audit activities, including timely reviews of work performed and the resolution of matters identified, are closely associated with high quality audits. Audit Quality Milestones are intended to drive consistency of engagement teams in project management, timing of when work is done, and necessary focus on engagement staffing, including sufficiency and the skills, knowledge, or experience of assigned resources.



### External inspections<sup>9</sup>

In addition to our own monitoring of audit quality, we are subject to external monitoring by the Danish Business Authority (DBA) and the US Public Company Accounting Oversight Board (PCAOB).

The results of the latest inspection by the DBA were published in April 2022. The conclusion from the DBA was the following:

<sup>9</sup> EU transparency reporting requirement: a description of the internal quality control system of the audit firm and a statement by the administrative or management body on the effectiveness of its functioning.

"In the selected sample of assurance engagements, there were material observations in two out of 13 assurance engagements reviewed. These observations concerned two non-PIE assurance engagements, and they were identified by the Audit Firm in connection with their own monitoring and evaluation of assurance engagements. The Business Authority considers the remedial steps initiated by the Audit Firm with respect to the observations to be adequate and appropriate in the circumstances and has not, based on this, identified any improvement points regarding assurance engagements.

Nothing has come to the Business Authority's attention that causes it to conclude that the circumstances observed on the two assurance engagements are of a general nature for the Audit Firm, and nothing has come to the Business Authority's attention that causes it to conclude that the assurance engagements reviewed were not generally performed in accordance with audit regulations and the quality control system. Thus, nothing has come to the Business Authority's attention during its quality control that causes it to believe that the quality control system has not been used to an adequate degree.

Based on the quality control performed, the Business Authority has decided to close its quality control without any further follow-up, see Danish Public Accountants Act S 35a(1)(i).

Therefore, the Business Authority considers the 2021 quality control closed."

We concur and are pleased with the Danish Business Authority's conclusion.

The Public Company Accounting Oversight Board (PCAOB) conducted together with the Danish Business Authority a joint inspection of Deloitte in the spring of 2019. The final inspection report was received in February 2021 and contained some significant observations regarding the performance of the audit of two of the controlled engagements and the internal quality control system. We concur with the conclusion and we have immediately taken remedying measures. Deloitte has responded the actions implemented to the PCAOB in February 2022.



Causal factor analysis and remediation

Continuous improvement is essential to Deloitte's culture of quality and excellence. Understanding why deficiencies occur is critical to the design of effective actions to remediate findings. When deficiencies are identified, whether through internal or external monitoring activities, actions are taken to identify gaps and appropriate remediation activities. Remediation is imperative to drive continuous improvement in audit quality and avoid future similar findings. An audit quality plan is prepared by Deloitte Denmark and provides for effective implementation and monitoring of key audit quality priorities.

Statement on the effectiveness of the functioning of the internal quality control system<sup>10</sup>

We confirm that we are satisfied that our internal quality controls and systems are robust, operate effectively, and allow us to readily identify any areas of potential enhancement. We continually seek to refine all aspects of our business and we use the findings of the practice review, other internal reviews, and external reviews and regulatory inspections to enhance our system of quality control.

<sup>10</sup> Effective 15 December 2022, ISQM 1 will require an evaluation, at least annually, of the firm's system of quality management, specifically whether the system provides Deloitte Denmark with reasonable assurance that the objectives of the system of quality management are being achieved..

# Deloitte Global Ethics



Deloitte is committed to conducting business with honesty, distinctive quality, and high standards of professional behavior.

Deloitte's Global Principles of Business Conduct ("Global Code") outlines Deloitte's ethical commitments as a network and expectations for Deloitte's approximately 345,000 people, giving a strong, principled foundation. The foundations of the network's ethics program is comprised of the following elements:



# Independence, ethics, and additional disclosures

### Deloitte Global Independence

-  Sets **independence policies and procedures** based upon the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants and, where applicable, the independence standards of the US Securities and Exchange Commission and the Public Company Accounting Oversight Board.
-  Supports firms, as needed, with their annual SQC review and gives insights into global areas of focus. On a three-year cycle, Deloitte Global Independence provides **independence subject matter expertise that is leveraged during the firms' annual SQC** review as part of Audit Quality Monitoring & Measurement. In-depth follow-up reviews are conducted as needed.
-  Provides firms with **on-going independence expertise** through consultation—enabling continuous enhancements to global policies, procedural expectations, tools, and practice support activities.
-  Delivers **global systems** to provide its people with entity information to support compliance with personal and professional independence requirements, including financial interests, scope of service approvals.
-  Promotes **independence awareness** across the Deloitte network through active engagement with independence and business leadership groups, periodic communications and alerts, and development of guidance, learning and instructions.

### Deloitte Denmark Independence<sup>11</sup>

Deloitte Denmark has policies and procedures designed to address compliance with applicable professional standards, laws and regulations that relate to independence. These policies and procedures are based on the Deloitte Global Independence policy, and are supplemented, as appropriate, to reflect additional national or regional requirements that may be

more restrictive than Deloitte Global policies. Deloitte Denmark leadership reinforces the importance of compliance with independence and related quality control standards, thereby setting the appropriate tone at the top and instilling its importance into the professional values and culture of Deloitte Denmark. Strategies and procedures to communicate the importance of independence to partners, other practitioners, and support staff

have been adopted, emphasizing each individual's responsibility to understand and meet the independence requirements. The Director of Independence is responsible for overseeing independence matters within Deloitte Denmark, including the design, implementation, operation, monitoring, and maintenance of the system of quality control related to independence.

As part of the firm's system of quality control, Deloitte Denmark has:

- implemented responses (policies, procedures, and controls) to quality risks it has identified for its key independence areas;
- Performed appropriate monitoring activities over its key independence areas; and
- Has appropriate independence governance in place.

The firm's key independence areas include:

- Client, engagement, and business relationships, including use of the independence business process tools, the Deloitte Entity Search and Compliance (DESC) system, and the Service Request Monitoring (SRM) application
- Firm and personal financial relationships, including the use of the Global Independence Monitoring System (GIMS)
- Employment and other relationships
- Independence confirmations
- Independence consultations
- Independence-related policies, communications, and learning
- Breaches of independence requirements
- Disciplinary measures for failures to adhere to applicable independence requirements

An internal review of independence compliance with the above key independence areas was conducted during the year.



### DESC Deloitte Entity Search and Compliance

Global, searchable database containing specific entity information relevant in determining personal and professional independence restrictions



### SRM Service Request Monitoring

Application integrated with DESC that provides a standard business process workflow for submitting and reviewing preapproval requests to provide services to clients



### GIMS Global Independence Monitoring System

Application that contains financial relationship data with relevant independence compliance indicators

### Long association requirements of audit partners and practitioners<sup>12</sup>

The rotation requirements in the Audit Act states that it is not possible to sign the audit report for a public interest entity for more than seven years. In Deloitte Denmark, a leadership group monitors the staffing of the firm's public interest entities and ensures rotation of key members of the audit team in compliance with the requirements and without loss of important knowledge and experience about the client's business.

### Confirmation of review of independence practices and monitoring

In accordance with Article 13.2 (g) of the EU Audit Regulation, we confirm that an internal review of our independence practices has been properly conducted in the year as a part of the 2021 practice review. Our internal and global practice reviews and other monitoring processes provide us with assurance that these policies are, in general, appropriately observed and, where exceptions are noted, identify where further action is required. In addition, the practice review includes an assessment of compliance with Deloitte Global independence policies and Danish additions. The results of these internal reviews are reported to the Executive team.

<sup>11</sup> EU transparency reporting requirements: a statement concerning the audit firm's independence practices which also confirms that an internal review of independence compliance has been conducted.

<sup>12</sup> EU transparency reporting requirements: a description of the audit firm's policy concerning the rotation of key audit partners and staff.



Ethics

All Deloitte people are expected to act with integrity in accordance with high ethical standards as described in the Deloitte Global Principles of Business Conduct (“Global Code”). The Global Code is embedded into each member firm’s Code of Conduct and defines the commitments that all Deloitte people make regarding ethical standards, as well as explaining each individual’s responsibilities to their clients, colleagues, and society.

In addition to the Global Code, other foundational elements of Deloitte’s ethics program include global policies, a program of training and communications, and established reporting channels supported by defined incident management protocols. For continuous improvement, regular program assessments and reviews are conducted, and feedback is collected from Deloitte people through an annual ethics survey.

Ethics at Deloitte is led by the Deloitte Global Chief Ethics Officer at the global level, and by member firm Ethics Officers at the local level, who are experienced partners with direct access to the member firm’s CEO and governing body. Deloitte Global and member firm ethics leaders work together to continually monitor risk and to reinforce compliance with the Global Code.

Deloitte Denmark maintains policies and procedures that build on the global policies and are designed to provide reasonable assurance that its people comply with relevant ethical requirements.

The ethical requirements for audit and related assurance services provided by Deloitte Denmark are in accordance with Deloitte Global policies and procedures which align with the requirements and guidance set out in the international Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, a standard-

setting body of the International Federation of Accountants (IFAC).

Deloitte Denmark reinforces its commitment to ethics and integrity through communication tools, learning programs, compliance processes, and measurement systems for all people. Learning includes targeted content for onboarding, manager promotion, independent contractors, and refresher programs every two years. Recent global training topics have included a focus on the importance of owning up to one’s mistakes, navigating personal relationships in the workplace, and demonstrating respect, integrity and professionalism on social media, and courses have included a confirmation that professionals are aware that answers should not be shared with others and doing so would constitute a violation of the Global Code. In addition, Deloitte Denmark conducts ethics reviews for senior leaders and requires all partners, other practitioners, and support staff to confirm annually that they have read and comprehended the member firm’s Code of Conduct and understand that it is their responsibility to comply with it.



# Appendices



# Appendix A | EU/EEA audit firms

**Disclosure in accordance with Article 13.2 (b)(ii)-(iv) of the EU Audit Regulation<sup>13</sup>**

**EU/EEA Member State** (Article 13.2 (b)(iii) EU Audit Regulation: the countries in which each audit firm that is a member of the network is qualified as a statutory auditor or has its registered office, central administration or principal place of business).

**Name of audit firms carrying out statutory audits in each Member State** (Article 13.2 (b)(ii) EU Audit Regulation: the name of each audit firm that is a member of the network)

EU/EEA Member State <sup>14</sup>	Name of audit firms carrying out statutory audits in each Member State <sup>15</sup>
Austria	Deloitte Audit Wirtschaftsprüfungs GmbH Deloitte Niederösterreich Wirtschaftsprüfungs GmbH Deloitte Oberösterreich Wirtschaftsprüfungs GmbH Deloitte Salzburg Wirtschaftsprüfungs GmbH Deloitte Tirol Wirtschaftsprüfungs GmbH Deloitte Wirtschaftsprüfung Styria GmbH
Belgium	Deloitte Bedrijfsrevisoren/Réviseurs d’Entreprises BV/SRL
Bulgaria	Deloitte Audit OOD
Croatia	Deloitte d.o.o. za usluge revizije
Cyprus	Deloitte Limited
Czech Republic	Deloitte Audit s.r.o.
Denmark	Deloitte Statsautoriseret Revisionspartnerselskab
Estonia	AS Deloitte Audit Eesti
Finland	Deloitte Oy
France	Deloitte & Associés Deloitte Marque & Gendrot

<sup>13</sup> EU Regulation 537/2014 on specific requirements regarding statutory audit of public-interest entities

<sup>14</sup> EU transparency reporting requirement: the countries in which each audit firm that is a member of the network is qualified as a statutory auditor or has its registered office, central administration, or principal place of business.

<sup>15</sup> EU transparency reporting requirement: the name of each audit firm that is a member of the network.

EU/EEA Member State <sup>14</sup>	Name of audit firms carrying out statutory audits in each Member State <sup>15</sup>
	Deloitte Audit Holding BEAS Cisane Constantin Associés D. Associations DB Consultant ECA Audit Opus 3.14 Audit et Conseil Pierre-Henri Scacchi et Associés Revi Conseil
Germany	Deloitte GmbH Wirtschaftsprüfungsgesellschaft Deutsche Baurevision GmbH Wirtschaftsprüfungsgesellschaft SüdTreu Süddeutsche Treuhand GmbH Wirtschaftsprüfungsgesellschaft
Greece	Deloitte Certified Public Accountants S.A.
Hungary	Deloitte Könyvvizsgáló és Tanácsadó Kft.
Iceland	Deloitte ehf.
Ireland	Deloitte Ireland LLP
Italy	Deloitte & Touche S.p.A.
Latvia	Deloitte Audits Latvia SIA
Liechtenstein	Deloitte (Liechtenstein) AG
Lithuania	Deloitte Lietuva UAB
Luxembourg	Deloitte Audit
Malta	Deloitte Audit Limited
Netherlands	Deloitte Accountants B.V.
Norway	Deloitte AS
Poland	Deloitte Audyt spółka z ograniczoną odpowiedzialnością spółka komandytowa Deloitte Audyt spółka z ograniczoną odpowiedzialnością
Portugal	Deloitte & Associados, SROC S.A.
Romania	Deloitte Audit SRL
Slovakia	Deloitte Audit s.r.o.
Slovenia	Deloitte Revizija d.o.o.



EU/EEA Member State <sup>14</sup>	Name of audit firms carrying out statutory audits in each Member State <sup>15</sup>
Spain	Deloitte, S.L.
Sweden	Deloitte AB

**Disclosure in accordance with Article 13.2 (b)(iv) of the EU Audit Regulation <sup>16</sup>**  
The total turnover achieved by the audit firms that are members of the network, resulting from the statutory audit of annual and consolidated financial statements: € 2.1 billion<sup>17</sup>

<sup>16</sup> EU transparency reporting requirement: the total turnover achieved by the audit firms that are members of the network, resulting from the statutory audit of annual and consolidated financial statements.

<sup>17</sup> Amount represents an estimate determined based upon best efforts to collect this data. Certain Deloitte audit firms registered to perform statutory audits in respective member states provide statutory audit services as well as other audit, assurance, and non-audit services. While Deloitte endeavored to collect specific statutory audit turnover for each EU/EEA Deloitte audit firm, in certain cases turnover from other services has been included. The turnover amounts included herein are as of 31 May 2022, except for a limited number of instances where a Deloitte audit firm has different financial year-end or has not finalized its reporting for such period. In these cases, turnover amounts are for the relevant financial year or preceding financial year. Where currency other than the Euro is used in the member state, the amount in Euros was translated using an average exchange rate in effect for the period 1 June 2021 to 31 May 2022.

## Appendix B | Financial information<sup>20</sup>

**Disclosure in accordance with Article 13.2 (k)(i)-(iv) of the EU Audit Regulation**

The breakdown of the Deloitte Statsautoriserede Revisionspartnerselskabs 2021/22 revenue<sup>21</sup> :

Turnover <sup>22</sup>	DKK'm
Statutory audit (PIEs or PIE subsidiaries)	129
Statutory audit (non-PIEs or non-PIE subsidiaries)	833
Non-audit services (audited PIEs or PIE subsidiaries)	35
Non-audit services (audited non-PIEs or non-PIE subsidiaries)	713
Non-audit services (other entities)	2.732
<b>Total</b>	<b>4.442</b>

Disclosure in accordance with section 1, subsection 1-3 and section 2, subsection 1, schedule 5 of Regulation of Municipal and Regional Audit:

Statutory audit (municipalities, regions, and municipal communities)	DKK'm 12
Non-audit services (municipalities, regions, and municipal communities)	DKK'm 21

<sup>20</sup> Non-EU (third-country) auditors may choose to present financial information in this or other alternative formats (click here for illustrative example).

<sup>21</sup> “Turnover” for some member firms may mean revenues, net sales, etc.

<sup>22</sup> EU transparency reporting requirement: information about the total turnover of the audit firm, divided into the following categories:  
2(k)(i). Revenues from the statutory audit of annual and consolidated financial statements of public-interest entities and entities belonging to a group of undertakings whose parent undertaking is a public-interest entity;  
2(k)(ii). Revenues from the statutory audit of annual and consolidated financial statements of other entities;  
2(k)(iii). Revenues from permitted non-audit services to entities that are audited by the audit firm; and  
2(k)(iv). Revenues from non-audit services to other entities.





# Appendix C | Public interest entities

## Disclosure in accordance with Article 13.2 (f) of the EU Audit Regulation

Public Interest Entities Audited for Statutory Purposes by Deloitte Statsautoriseret Revisionspartnerselskab in the Financial Year 2021/22:

### Financial companies, cf. section 1a, subsection 3b, of the Danish Audit Act

- AkademikerPension - Akademikernes Pensionskasse
- Aros Forsikring - Gensidigt
- Coop Bank A/S
- Dansk Musiker Forbund Forsikring G/S
- Ekspres Bank A/S
- Facit Bank A/S
- Forsikringsselskabet Dansk Sundhedssikring A/S
- Forsikringsselskabet Vendsyssel A/S
- Frørup Andelskasse
- Gf Forsikring A/S
- Kongeriget Danmarks Hesteforsikring G/S
- Købstædernes Forsikring, Gensidig
- Lunar Bank A/S
- Lærernes Pension Forsikringsaktieselskab
- Meles Insurance A/S
- Nem Forsikring A/S
- Norli Pension Livsforsikring A/S
- PFA Bank A/S
- PFA Pension, Forsikringsaktieselskab
- Rise Sparekasse

- Rønde Sparekasse
- Salling Group Forsikring A/S
- Saxo Bank A/S
- Sparekassen Danmark af 1871
- Sparekassen for Nr. Nebel og Omegn

### Companies that have equity investments, debt instruments or other securities admitted to trading on a regulated market in an EU country or an EEA country cf. section 1a, subsection 3a of the Danich Audit Act.

- A/S Storebæltsforbindelsen
- A/S Øresundsforbindelsen
- Aktieselskabet Nordfyns Bank
- Bavarian Nordic A/S
- Blue Vision A/S
- Brødrene Hartmann A/S
- ChemoMetec A/S
- Columbus A/S
- Copenhagen Capital A/S
- Danica Pension
- Danske Andelskassers Bank A/S
- Danske Bank A/S

- Demant A/S
- Frontmatec Group ApS
- GreenMobility A/S
- H+H International A/S
- Hvidbjerg Bank A/S
- Investeringsforeningen Carnegie Wealth Management
- Investeringsforeningen Falcon Invest
- Investeringsforeningen Fundamental Invest
- Investeringsforeningen Great Dane
- Investeringsforeningen Gudme Raaschou
- Investeringsforeningen IA Invest
- Investeringsforeningen Lån & Spar Invest
- Investeringsforeningen PFA Invest
- Investeringsforeningen Selected Investments
- Investeringsforeningen StockRate Invest
- Jeudan A/S
- Kapitalforeningen Independent Invest
- Kapitalforeningen Lån & Spar MixInvest
- Kapitalforeningen SDG Invest
- Kommunekredit
- Lån & Spar Bank A/S

- Møns Bank A/S
- Nilfisk Holding A/S
- NKT A/S
- Novo Nordisk A/S
- Penneo A/S
- Per Aarsleff Holding A/S
- Realkredit Danmark A/S
- Ress Life Investments A/S
- Royal Unibrew A/S
- RTX A/S
- Scandinavian Brake Systems A/S
- Scandinavian Investment Group A/S
- Solar A/S
- Spar Nord Bank A/S
- Sparekassen Sjælland-Fyn A/S
- TCM Group A/S
- TDC Holding A/S
- TDC Net A/S
- Totalbanken A/S
- Vestjysk Bank A/S
- Øresundsbro Konsortiet I/S

### Disclosure in accordance with section 1, subsection 1-3 and section 2, subsection 1, schedule 5 of Regulation of Municipal and Regional Audit

Municipalities, regions and municipal communities, Audited for Statutory Purposes by Deloitte Statsautoriseret Revisionspartnerselskab in the financial year 2021/22:

- I/S Amager Ressourcecenter
- Ishøj Kommune
- Københavns Kommune
- Ringkøbing-Skjern Kommune
- Struer Kommune
- Tårnby Kommune
- Aalborg kommune



# Equity owners in Deloitte

Deloitte Statsautoriseret Revisionspartnerselskab is owned by the following equity owners, as of 1 September 2022.

**Equity owners who are state authorized public accountants (each owns an A-share of 0.4 DKK'm)**

Claus Jorch Andersen	Bjørn Winkler Jakobsen	René Winther Pedersen
Lars Andersen	Jørn Jepsen	Jacques Peronard
Niels-Jørgen Andersen	Anders Kreiner	Sten Peters
Søren Asger Reinhold Andersen	Lars Kronow	Jens Ringbæk
Michael Bach	Thomas Kühn	Jens Lundgaard Simonsen
Jens Jørgensen Baes	Ole Søndergaard Larsen	Jesper Smedegaard Larsen
Jakob Boutrup Ditlevsen	Jakob Lindberg	Michael Thorø Larsen
Anders Vad Dons	Kirsten Aaskov Mikkelsen	Sumit Sudan
Morten Egelund	Kim Takata Mücke	Lars Birner Sørensen
Anders Oldau Gjelstrup	Peter Mølkjær	Sofus Emil Tengvad
Mikael Grosbøl	Lars Bjerregaard Nielsen	Per Krause Therkelsen
Bo Damgaard Hansen	Jacob Nørmark	Kasper Bruhn Udam
Jan Guldmand Hansen	Bo Blaabjerg Odgaard	Niels Skannerup Vendelbo
Lars Siggaard Hansen	Bill Haudal Pedersen	Henrik Jacob Vilmann Wellejus
Sune Baadsager Holm	Jens Sejer Pedersen	

**Equity owners who is a state authorized public audit companies (each owns an A-share of 0.4 DKK'm)**

HEV	2741	Statsautoriseret Revisionsanpartsselskab, CVR-nr. 34048223 (100% owned by Henrik Vedel)
LKN	1722	Statsautoriseret Revisionsanpartsselskab, CVR-nr. 34075131 (100% owned by Lars Knage Nielsen)
TRA	11941	Statsautoriseret Revisionsanpartsselskab, CVR-nr. 37740829 (100% owned by Thomas Rosquist Andersen)
NTH	11239	Statsautoriseret Revisionsanpartsselskab, CVR-nr. 31488303 (100% owned by Nikolaj Thomsen)

DD 3	Statsautoriseret Revisionsanpartsselskab, Business Registration No 34075638 (100% owned by Holdingselskabet af 1. juni 2017 A/S)
DD 4	Statsautoriseret Revisionsanpartsselskab, Business Registration No 34075646 (100% owned by Holdingselskabet af 1. juni 2017 A/S)
DD 6	Statsautoriseret Revisionsanpartsselskab, Business Registration No 34075662 (100% owned by Holdingselskabet af 1. juni 2017 A/S)
DD 7	Statsautoriseret Revisionsanpartsselskab, Business Registration No 34075670 (100% owned by Holdingselskabet af 1. juni 2017 A/S)
DD 8	Statsautoriseret Revisionsanpartsselskab, Business Registration No 34075689 (100% owned by Holdingselskabet af 1. juni 2017 A/S)
DD 9	Statsautoriseret Revisionsanpartsselskab, Business Registration No 34075697 (100% owned by Holdingselskabet af 1. juni 2017 A/S)
DD 10	Statsautoriseret Revisionsanpartsselskab, Business Registration No 34075700 (100% owned by Holdingselskabet af 1. juni 2017 A/S)

**Other equity owners (each owns an A-share of 0.4 DKK'm.)**

Jes Østergaard Andersen	Christian Schelde Jensby	Andreas Hasselsteen	Thomas Strand
Thomas Andersen	Tore Christian Holroyd-Jensen	Nikolajsen	Jakob Ørskov Søndebro
Jan Auerbach	Gustav Jeppesen	Martin Nyrop	Jens Sønderkær
Lars Nygaard Bertelsen	Carsten Jørgensen	Peter Sandfeld Olesen	Kim Hendil Tegner
Lars Berg-Nielsen	Mette Louise Kaagaard	Martin Poulsen	Michael Theill
Mikkel Aare Boe	Søren Nøddebo Kabel	Thomas Vibe Ringsted	Terkel Kristian Tolstrup
Tinus Bang Christensen	Jesper Kamstrup-Holm	Morten Ry	Kasper Toftemark
David Egebjerg Colgan	Camilla Charlotte Kruse	Kristian Salling	Michael Vad
Anja Dalgas	Tinnamaria Marlou Larsson-Bertelsen	Alan Saul	Sara Stentz Zahle
Mads Damborg		Kristian Skotte	
Hans Henrik Bonde Eriksen	Jørgen Leisner	Jesper Skriver-Simony	
Ulrik Linder Jakobsen	Martin Niedersøe	Henrik Stephansen	

ANM 7089 ApS	ApS, Business Registration No 42413941 (100% owned by Anders Morand)
CHR 15277	ApS, Business Registration No 39705370 (100 % owned by Christian Husted Rasmussen)
MKS Invest ApS	ApS, Business Registration No 29845956 (100% owned by Marianne Koue Smith)
MSN 6504 ApS	ApS, Business Registration No 34075522 (100% owned by Martin Søegaard Nielsen)
NIJ 11940	ApS, Business Registration No 36474521 (100% owned by Niels Josephsen)
SEJ 10844	ApS, Business Registration No 40156038 (100% owned by Sigurd Ersted Jensen)
Ties Risk Services Werkmaatschappij B.V. (100% owned by Hendrikus Jan van Beek)	

**B-shares**

Besides an A-share of nom. 0,4 DKK'm, Jens Lundgaard Simonsen owns 20 B-shares of nom. 100 DKK, in total 2,000 DKK. Each B-share has a proportion of voting rights.

**The equity owners' total ownership and voting share in the Company**

The 48 state authorised public accountants own directly or indirectly each one share that in total amount to nominal 19.2 DKK'm of the share capital in the Company corresponding to 38,4% of the voting rights.

Holdingselskabet af 1. juni 2017 Statsautoriseret Revisionsaktieselskab owns indirectly 7 shares, nominal 2.8 DKK'm, corresponding to 5.6% of the voting rights.

Jens Lundgaard Simonsen owns 20 B-shares, nom. 2,000 DKK, corresponding to 16% of the voting rights.

Totally, 22.0 DKK'm of the share capital of the Company, corresponding to 60.0% af the voting rights is owned by state authorised public accountants or state authorised audit companies.

The 50 equity owners that are not state authorised public accountants or state authorised audit companies own directly or indirectly shares to a total nominal value of 20.0 DKK'm, corresponding to 40.0% of the voting rights.

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