

Statement - Transparency Act 2024

Background and purpose

Pursuant to Section 5 of the Transparency Act, Eksportfinans is required to publish an account of due diligence assessments in accordance with the OECD Guidelines for Multinational Enterprises. This document contains such statement pursuant to Section 4 of the Transparency Act. The report will be updated annually or in the event of significant changes in the company's risk assessments.

About Eksportfinans and the division of responsibility

Eksportfinans' business is to manage a portfolio consisting of current export credits and international securities. The company is financed through long-term bonds issued in international capital markets. Eksportfinans is located in central Oslo and has a small and competent organization with 19 employees.

The Director of Staff and Operations is responsible for ensuring that Eksportfinans meets the requirements of the Transparency Act. This area of responsibility includes conducting and supervising due diligence assessments, developing internal guidelines and routines to reduce the risk of negative consequences, as well as the division of responsibilities and tasks within the company. The Board has the overall responsibility for ensuring that these obligations are fulfilled.

Guidelines and procedures

Eksportfinans' commitment to safeguarding human rights and conducting due diligence assessments is rooted in the company's sustainability guidelines. The guidelines are also integrated in internal procurement procedures. Furthermore, the guidelines provide information on internal whistleblowing channels and complaint mechanisms designed to help uncover negative consequences and ensure that complaints from any affected stakeholders and licensees are addressed.

The company's expectations to suppliers and business partners are communicated through a document attached to each supplier contact. The expectations are based on the company's sustainability guidelines, and it is assumed that every supplier and business partner comply with the expectations.

Due diligence results

Eksportfinans continuously works to comply with applicable legislation. The company's commitment to accountability at all levels means that the internal risk of negative consequences is assessed as low. Actual negative consequences in the business have not been revealed through the due diligence assessments that have been carried out. One supplier in the food sector was followed up after findings and has answered the questions raised in a satisfactory manner, which shows that the company takes questions about human rights and working conditions seriously.

Traditionally the financial industry has been considered to have lower risk compared to other sectors. This has been taken into account in Eksportfinans' approach to due diligence. The company's role as a service provider

has also been considered, as this generally entails lower risk compared to manufacturing operations. In addition, a thorough assessment has been made related to where the greatest potential for negative impact on human rights and decent working conditions among the company's suppliers and business contacts may be.

Eksportfinans purchases goods and services for approximately NOK 42 million annually. In connection with this, the company has prepared an overview of all suppliers exceeding annual purchases of NOK 200,000, in line with the principle of proportionality pursuant to section 4, second paragraph, of the Transparency Act. These suppliers accounted for 91 percent of total purchases in 2024. The most important procurement categories are:

- IT solutions
- Consulting
- Office supplies and services

The due diligence assessments conducted by Eksportfinans are based on risks related to industries, geographical areas, businesses and products. To conduct the analyses, publicly available sources on ESG risk have been used. All of Eksportfinans' suppliers are from the Nordic region, Western Europe or North America and operate primarily outside risky industries, businesses or products. The risk of negative impacts on human rights and working conditions is therefore considered to be low.

The findings of this risk analysis will be reviewed regularly. Updates will also be made in the event of changes in the company's activities or products.

Measures

Eksportfinans has sent out the company's expectations to suppliers and business partners with regard to fundamental human rights and decent working conditions, climate and environment, corruption, and health, safety and environment (HSE). The expectation document is distributed to all suppliers where Eksportfinans' annual purchases exceeded NOK 200,000.

Eksportfinans' due diligence assessments consistently show low risks related to human rights and decent working conditions in its own operations, as well as among suppliers and business associates. It is therefore not considered necessary to implement special measures at this time. The decision not to implement measures is in line with the principle of proportionality pursuant to the Transparency Act, Section 4, second paragraph.

Information requirements

Pursuant to section 6 of the Transparency Act, everyone has the right to obtain information about how Eksportfinans treats negative consequences related to human rights and working conditions (information requirements).

Eksportfinans has established internal procedures to ensure compliance with the due diligence requirements and the duty of disclosure.

In case of information requirements, a written request can be sent to eksportfinans@eksportfinans.no.

Passed by the Board on February 11, 2025

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(Please see Norwegian version for signatures)