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Sustainability and societal engagement

External impact

Economic growth and prosperity are intrinsic benefits which as many people as possible should have the opportunity to share in. However, activities which contribute much of a positive nature may also have negative aspects. By contributing to growth, new companies, new homes, production and financing in conjunction with the local banks, Eika also helps to reduce greenhouse gas (GHG) emissions, consumption of materials and resources, and pressure on the natural environment.

The cumulative effect of centuries of rising emissions, resource consumption and loss of global biodiversity is reaching a level where people's future livelihoods are under threat. We therefore have a responsibility to reduce the negative consequences of our activities on the world around us in the years ahead in order to ensure that our own wellbeing is not achieved at the expense of

coming generations. Nor must our wellbeing come at the expense of the global population's human and labour rights.

Eika has significant opportunities to contribute to sustainable development – and therefore also a great responsibility to ensure the sustainability of its business model. To do so, the group must first understand its impact on the world today.

In 2024, Eika Boligkreditt performed a double materiality assessment (DMA). A DMA assesses a company's impacts on the environment and society (impact materiality) alongside how sustainability issues affect the company's financial performance (financial materiality), Eika Boligkreditt's DMA will form the basis for the company's further sustainability-related efforts and its reporting in accordance with the EU's Corporate Sustainability Reporting Directive (CSRD).

Stakeholder analysis for Eika Gruppen



Societal engagement

The local banks in Norway were established to contribute to financial and social sustainability in their respective communities. By creating opportunities for companies, jobs, residential mortgages and savings, they have contributed to vigorous local communities and inclusive economic progress. Both directly and by supporting the efforts of the local banks, Eika’s sustainability work builds on more than 150 years of commitment to sustainable development on the part of the local banks, .

Eika’s societal engagement is no longer confined to economic and social sustainability. It now involves both safeguarding the local community and overcoming major global problems, such as climate change, loss of biodiversity and lack of respect for human rights. The financial sector plays an important role in the transition to greater sustainability locally, nationally and globally. As one of the largest and most important players in the Norwegian financial sector, Eika is conscious of its duty to make the necessary changes and accept responsibility for the group’s impact on the world through its operations and value chain.

The role of the local banks as drivers of growth and development for private customers, businesses and local communities in Norway will be more important than ever in the future. Their advisory services and closeness to customers make them key players in the restructuring of small Norwegian companies, and in securing new economic activity and jobs when unsustainable operations must be replaced. Proximity to their customers also gives the local banks a good starting point for offering relevant products to the growing group of customers for whom sustainability is important.

Eika’s stakeholders

Eika has identified its most important stakeholder groups and significant issues for its interaction with these. The most important stakeholders are the local banks, employees, customers, partners, government agencies, investors, local communities and society as a whole. Further important sub-categories of these groups are presented in the stakeholder overview on this page. The stakeholder analysis is the result of a cross-disciplinary collaboration involving all Eika companies, and is endorsed by the group’s corporate management and board.

Extensive contacts are maintained through various channels with important stakeholder groups, and the local banks deal with and communicate significant issues of concern to their own customers and communities.

Vision and purpose

Eika’s core business strengthens the local banks through good and cost-effective provision of products and services for modern and efficient banking. Eika aims to be Norway’s most attractive partner

for independent banks. The company's vision – “Eika is the first choice for independent banks” – sums up the company's objective: To ensure strong and caring local banks which can be a driving force for growth and development, on the part of customers and local communities. Its core business thereby supports the moral and ethical compass of the local banks and the social mission that the local savings banks in the Eika Alliance fulfil. The motto is: “Present locally – with people you can meet and forge relationships with. Advisers who create a sense of security between people and an assurance that you are making the financial choices which are right for you.”

International and national initiatives supported by Eika

Eika draws on recognised national and international initiatives in its work on sustainability.

- UN Sustainable Development Goals (SDGs)
- UN Principles for Responsible Investment (PRI)
- Eco-Lighthouse
- Guide against Greenwashing
- Women in Finance Charter

UN Sustainable Development Goals (SDGs)

UN SDGs, which represent the world's shared plan for eliminating poverty, combating inequality and halting climate change by 2030. Coming into effect on 1 January 2016, these objectives provide many companies with a roadmap for their strategies on environmental responsibility and corporate social responsibility (CSR).

The group influences several of the SDGs, but recognises that its impact may be greater for some selected targets than for others. Eika Boligkreditt supports the following SDGs and considers that the most relevant approach is to give particular emphasis to:

- **SDG 8:** Decent work and economic growth Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.
- **SDG 11:** Sustainable cities and communities Make cities and local communities inclusive, secure, resilient and sustainable.
- **SDG 13:** Climate action Act immediately to combat climate change and its consequences.

To operationalise these sustainability goals, Eika Boligkreditt has established a scorecard with 11 key performance indicators.

For details of how the climate footprint of the residential mortgage business has been calculated, see the separate report prepared by Multiconsult (eikbol.no/Investor-relations/green-bonds). Eika Boligkreditt aims to set a target for the climate footprint of its residential mortgage business. In 2024, Eika Banksamarbeid (EBS) adopted a shared ambition to achieve net-zero emissions at all banks by 2050 at the latest. This enabled Eika Boligkreditt to set similar goals. To support the shared ambition, three goals were set. Thus, each bank shall:

- keep an account of its direct emissions and material categories of indirect emissions for the 2024 financial year.
- establish further sub-goals in line with national and international obligations, and draw up action plans to realise them by the close of 2025.
- annually revise and update its climate accounts, sub-goals and action plans in line with the latest climate research

The goals of the banks will help Eika Boligkreditt set its own sub-goals and implement measures to achieve the goal of net zero emissions in the business by 2050 at the latest.



| KPI | Sustainability targets | Status 2024 | Status 2023 | Target |
|---|------------------------|---|---|---|
| Employee satisfaction, index 0–100 | 8 | 88 | 83 | ≥80 |
| Sickness absence | 8 | 7.1% | 5.1% | ≤2.5% |
| Ambition for internal promotion to managerial positions | 8 | 1 of 1 | 1 of 1 | Qualitative assessment |
| Gender balance employees | 8 | 5/20=25% | 4/19=21.1% | Short-term: ≥30% / Long-term: ≥40% |
| Gender balance directors | 8 | 3/6=50% | 2/6=33.33% | 40% |
| Serious HSE incidents | 8 | – | – | – |
| Alliance satisfaction, index 0–100 | 11 | 88 | 86 | ≥80 |
| Achieve approx. the same credit spread on covered bond financing as comparable issuers would have done with the same tenor, the same issued volume and the same issue date. | 11 | 0.69 bp | 0.75 bp | < +3 bp. |
| Percentage of loans with green collateral added to the cover pool | 13 | 21.4% | 23.4% | ≥20% |
| GHG emissions, CO ₂ equivalents from the residential mortgage business | 13 | Market-based emissions: 479 500 tonnes CO ₂ e Location-based emissions: 12 100 tonnes CO ₂ e | Market-based emissions: 420 000 tonnes CO ₂ e Location-based emissions: 17 300 tonnes CO ₂ e | Net zero emissions of greenhouse gases by 2050 at the latest |
| GHG emissions, CO ₂ equivalents from other business activity | 13 | 20.6 tonnes CO ₂ e | 12.1 tonnes CO ₂ e | ≤14.9 tonnes CO ₂ e in 2030, decrease of 50% from a historic average (2012–19) |

UN principles for responsible investment (PRI)

Eika Kapitalforvaltning has adopted the UN PRI in order to prepare and formalise its work on sustainable investment. The UN PRI represents the biggest global reporting project for responsible investment, and can be regarded as the global norm for best practice in the area. The principles challenge and inspire enterprises to take further account of environmental, social and governance (ESG) considerations in investment activities. The annual reporting will also be useful for customers wishing to make sustainable choices.

Eco-Lighthouse

The Eco-Lighthouse is a Norwegian national standard for environmental management, with EU recognition. While work on the UN principles deals with the way the world at large is affected by Eika’s products, services and value chain, Eco-Lighthouse certification ensures a properly-anchored concentration on environmental management, reducing and handling waste, and energy use and transport, in addition to sustainability processes within the group’s own operations and products. In 2021, Eika was certified in accordance with the Eco-Lighthouse scheme’s common criteria set as well as the criteria sets for tenants, banking and finance, and insurance. In 2024, Eika underwent a process of recertification. As a result,

Eika obtained Eco-Lighthouse certification at its premises in Oslo, Trondheim and Gjøvik for a further three years. Annual climate and environmental reports are also prepared for the business.

Guide against Greenwashing

Eika has signed the Guide against Greenwashing, as one of several measures to firmly entrench how the group will work on sustainability and communicate about its efforts. The guide provides advice on decision-making, and can be a source of new, sustainable ideas and working methods. Eika will give priority to measures which have real impact.

Women in Finance Charter

The Women in Finance Charter aims to help increase the proportion of women in senior positions in Norway's financial sector. Eika recognises the importance of this, and signed the charter in the autumn of 2021. Its goal is for women to hold 40 per cent of its managerial and specialist posts.

Strengthening the banks as a driving force for sustainable growth and development

Eika has the greatest impact on the world at large through the local banks. By raising awareness, enhancing insight and facilitating the banks' sustainability efforts, the group can help to reduce its value chain's actual adverse impacts on the climate/environment and social conditions.

The group will contribute to sustainability work at the local banks in such areas as bank systems and services, customer interfaces, procurement, expertise and insight. This requires that deliveries to the banks accord with ever-growing demands for and expectations of sustainability. Eika will offer relevant courses and competence enhancement for advisers, and communicate well and effectively with the banks about sustainability in the group's products. It will equip the banks to provide good sustainability-related advice and insights to customers, and to communicate relevant requirements in this area to the customer. The banks will receive regular information on where demands and expectations are expected to increase in the future, and Eika will promote experience-sharing within the alliance on the topic of sustainability.





The local banks account for the bulk of the alliance’s direct contact with customers and society. Offers to customers, risk management in the customer relationship and other contributions to each bank’s local community are important components in the alliance’s sustainability work. Eika’s contribution is largely indirect, through the provision of systems, tools and expertise to the banks and their staff. With its deliveries, Eika will support the local banks’

sustainability-related endeavours, both those directed at their customers and within their own operations.

An important precondition for Eika’s ability to strengthen the local banks is the way it discharges its role as a reliable financial player with good management and control.

Important milestones:

- Launch of green residential mortgage products (2020 and 2021).
- Incorporating sustainability assessments in credit evaluations for the banks’ business customers, with associated courses and webinars.
- Environment, Social and Governance (ESG) courses for employees throughout the alliance, with several banks making these compulsory for staff members.
- Eika’s sustainability week was staged for the fourth time in January 2025. During this event, all employees at Eika Gruppen, Eika Boligkreditt and the local banks are offered daily professional updates, articles and activities. The objective is to increase employees’ knowledge of and engagement with sustainability.
- In June 2024, Eika Banksamarbeid (EBS) adopted a shared ambition to achieve net-zero emissions at all banks by 2050 at the latest.
- Launch of support tools to help the banks calculate their financed emissions.
- Project management in support of double materiality analyses (DMAs) and compliance with the EU’s Corporate Sustainability Reporting Directive (CSRD).

In 2024, Eika continued its project to help the banks meet their CSRD reporting requirements. Considerable resources have been invested in this project, which aims to develop and implement solutions that will enable the alliance to comply with the new reporting requirements in a structured and efficient manner. The project, which includes 24 banks, represents a strategic measure to build competence, share experience and create shared systems to strengthen sustainability-related reporting throughout the alliance. Eika Gruppen has also supported the banks in connection with the Norwegian Transparency Act, provided advice on sustainability

reporting and furnished conversation templates relating to sustainability for corporate advisers, held webinars and otherwise shared relevant insights and knowledge. Priorities are set on the basis of extensive dialogue with the local banks and knowledge about the expectations of customers, investors and the public authorities.

Driver for climate and environment-friendly value creation

The world is facing an acute climate and environmental crisis. As a financial institution, Eika has great opportunities – and responsibilities – to promote climate- and environment-friendly value creation. Through the design of its services and products, as well as conscious choices for the value chain, the group can reduce

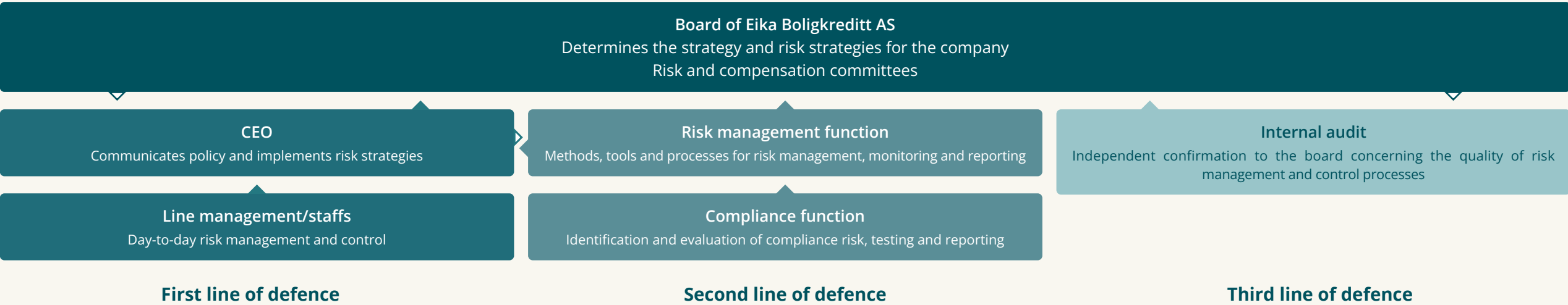
emissions and other adverse impacts on the natural environment. The ambition is to comply with the Paris Agreement on net zero emissions in Eika's operations and products by 2050 at the latest, while also respecting the planet's other tolerance thresholds.

Eika prepares annual climate accounting. In the past few years, the group has participated in a working group established by Finance Norway to develop guidance for calculating financed emissions. In 2024, Eika Gruppen helped the banks to set up individual climate accounts. This was one of the goals supporting the alliance's shared climate ambition of achieving net-zero emissions at all the banks no later than 2050.

Management and control

Eika Boligkreditt will be impacted by the increasing focus on and requirements for risk assessment, procedures and reporting in the sustainability area. This includes the EU Taxonomy, the CSRD and a growing focus on sustainability in the capital requirement regulations and the authorities' supervisory practices.

Effective risk management and good internal control are crucial for ensuring that goals are met, and form part of the ongoing management and follow-up of the business. Through good risk management and control, Eika Boligkreditt will be able at all times to identify, assess, deal with, monitor and report risks which could



▷ Instructions, parameters and authorities ◀ Formal reporting



prevent its attainment of its goals. The company's parameters for risk management and control define its willingness to accept risk and its principles for managing risk and capital. Risk management and control cover all types of risks which Eika Boligkreditt might be exposed to. The way risk is dealt with and controlled depends on its materiality. Risk management covers control, avoidance, acceptance, sharing or transfer of the risk to a third party. Controls embrace the organisation and division of labour, monitoring, reporting, and system-based and manual controls. They also cover values, attitudes, organisational culture, training and expertise, ethical guidelines, routines and procedures.

Eika Boligkreditt has established an independent risk management and compliance function, which continuously monitors and reports on whether risk management is complied with, functions as intended and is kept within approved limits. This function is organised in accordance with the principle of three lines of defence. Eika Boligkreditt's business is subject to extensive legislation, which regulates its various governance bodies and their composition.

Focus areas in 2024

Eika Boligkreditt focuses unceasing attention on money laundering and the financing of terrorism. It has revised its overarching guidelines, performed business-appropriate risk assessments and updated its in-house compliance procedures to encompass everything from risk drivers to control mechanisms.

In 2024, efforts were made to establish a comprehensive framework to safeguard data security at Eika Boligkreditt. New procedures were implemented in February 2024, after the project came to a close.

Changes in the Capital Requirement Regulation 3 (CRR3) have resulted in a new standard methodology for calculating capital requirements for credit risk. The new method is more risk sensitive than the current model, which has a lower capital requirement for loans with a low loan-to-value ratio. In addition, the changes will alter the method for calculating credit valuation adjustment (CVA) risk and operational risk. In 2024, efforts were made to clarify relevant issues which the new regulations may entail.

At the same time, a project was initiated to comply with the EU's Digital Operational Resilience Act (DORA). DORA's purpose is to strengthen the digital operational resilience of financial institutions in the EU/EEA. It includes detailed requirements for digital security and emergency preparedness.

A project is currently underway to implement the EU's new Corporate Sustainability Reporting Directive (CSRD). The main purpose of the CSRD is to push the economic "flow" towards more sustainable business models across the EU. The CSRD amends the Accounting Directive and specifies in more detail what kind of sustainability-related information a company must report on via the various European Sustainability Reporting Standards (ESRS). The first time enterprises will have a legal duty to report in accordance with the CSRD will be in connection with their annual reports for 2025.

Day-to-day management and follow-up

Eika Boligkreditt's vision is to strengthen the local bank. The company's main purpose is to ensure the local banks in the Eika Alliance have access to long-term and competitive funding by issuing covered bonds. An important part of the company's



business concept is to increase the competitiveness of the owner banks by improving their access to external funding in the Norwegian and international financial markets, with regard to the tenor of loans, their terms and the depth of access. Financing through Eika Boligkreditt involves generally longer tenors at a significantly more favourable rate than any of the owner banks could have achieved individually. That is precisely why Eika Boligkreditt has become a strategically important company for the owner banks – a company which contributes to enhanced competitiveness and lower risk exposure.

The strategic direction being taken by Eika Boligkreditt applies the balanced scorecard approach and provides a basis for implementing that approach alongside projects and action plans. In addition, the company prepares budgets and forecasts, financial and non-financial measurement criteria, authorisations, policies and routines which are reported on and followed up as part of the company's management. Action plans and the status of risk and measures are carefully monitored and incorporated in ongoing reporting to management and the board through the year. Eika Boligkreditt is managed in accordance with approved risk



strategies, and guidelines have been developed for risk reviews, which are intended to ensure that the company and outsourced activities manage risk in a satisfactory manner. Eika Boligkredit's values – reliable, engaged and brave – reflect the fundamental

characteristics of the company. Risk management and control in the company are rooted in these values, together with approved strategies. The strategies are further broken down into operational action plans, which provide specifications, priorities, allocation of

responsibilities and deadlines. Given the guidance and parameters in the strategy and action plans, risk management and control are built up around and within the business processes established to deliver the strategy. Management and control are thereby tailored to the business processes and specific requirements. This focuses risk management and control on the contribution to value, the commercial benefit and the most significant conditions for meeting the targets.

Role of the board

The board has adopted a set of instructions which set out the rules governing its work and decision-making. Its annual plan covers duties specified in legislation, statutory regulations, official requirements, the company's articles of association and so forth. The board is responsible for determining the company's overall goals and strategies, including risk strategies and risk profile, as well as other key principles and guidelines, in addition to the company's management and proper organisation. The board has established a separate set of instructions for the CEO. Board meetings are held in accordance with the annual plan, and as and when required. The board has appointed risk and compensation committees to prepare matters for consideration in these areas.

Role of the CEO

The CEO conducts day-to-day management of Eika Boligkredit and is in overall charge of all the company's operations. Responsibility for implementing strategies and policies approved by the board rests with the CEO. The CEO ensures that risk management and control are implemented, documented, monitored and followed up in an acceptable manner, and ensures that the necessary

resources, expertise and independence are provided for the risk management and compliance function. In addition, the CEO ensures that Eika Boligkreditt's risks are managed within the board's approved parameters. The CEO must continuously follow up management and control in all parts of the company's business.

Risk management function

The risk management function ensures that management and the board are at all times adequately informed about the company's risk profile through quarterly risk reporting and annual assessments of risk and capital requirements. It is responsible for continued development and implementation of an integrated framework for risk management, and for ensuring that this accords with external and internal requirements. That means policies and strategies must be in place which ensure the company is managed with the aid of goals and parameters for the desired level of risk, and that such policies and strategies are operationalised in an efficient manner. Ensuring clear responsibilities and roles plays a key role in management and control, along with follow-up of compliance through risk parameters and operational guidelines. The risk management function reports on a quarterly basis to Eika Boligkreditt's executive management and board.

Compliance function

The compliance function is charged with identifying and preventing risk posed by failure to comply with the regulations. Compliance risk is part of Eika Boligkreditt's operational risk, defined as the risk that the company incurs government sanctions or suffers financial or reputational loss because it fails to comply with legislation, statutory regulations and/or standards. The compliance function is

intended to have a preventive, advisory and monitoring role in the company, with responsibility for plans and testing in accordance with annual risk-based controls. It reports on a quarterly basis to Eika Boligkreditt's executive management and board of directors.

Internal audit function

The internal audit function provides independent confirmation that risk is dealt with in a satisfactory manner and that communication and interaction between the various lines of defence work as intended. It is the company's third line of defence. Eika Boligkreditt's independent internal audit function has been outsourced to PwC. The board approves annual plans for the internal audit function, which reports directly to the board. These reports are considered on a continuous basis by the directors.

IT security

Eika Security is a department which manages incidents related to cybersecurity and cybercrime. Based in Gjøvik, it shares premises with the Eika Service Centre.

All network traffic in Eika is monitored by systems which can pick up and detect malicious activity. Threat actors are constantly coming up with new tactics and techniques to circumvent these protections. This calls for personnel with the expertise to handle incidents and keep systems updated, and who are familiar with the threat picture. Eika Security is staffed by highly competent security personnel who deal with security incidents on a daily basis and who are familiar with the threats directed at the banking sector. The department also works in the area of cybercrime, with all payments made via online and mobile banking monitored to prevent fraud.





Eika Security is also part of an industry collaboration within the relevant disciplines, which means it stays informed at all times on current trends in both security and fraud.

Eika Boligkreditt will be subject to the Digital Operational Resilience Act (DORA) when it is transposed into Norwegian law. Among other things, DORA aims to make enterprises more resilient to cybersecurity threats and sets standards for the assessment and management of ICT risk. The company is working with Eika Gruppen to ensure that it has a robust ICT framework, which is resilient to cybersecurity threats.

Data protection

Eika Boligkreditt processes large volumes of personal data and is subject to the relevant regulations. Requirements for such processing are defined in Norway's Personal Data Act, which implements the EU's General Data Protection Regulation (GDPR). The company has developed guidelines for processing personal data which ensure compliance with the overall parameters in this area. Furthermore, a number of operative routines have been drawn up to ensure compliance with the overall guidelines during day-to-day operations.

The processing of personal data is defined in the GDPR as "any information that relates to an identified or identifiable natural person." This includes, for example, the gathering, recording, collation, storage and transfer of such data, or any combination thereof. The company is required to document how it processes data and the assessments made in relation to this. Company managers are responsible for ensuring that their employees have

sufficient knowledge of the regulations and that the guidelines are complied with.

In 2024, a total of two data protection non-conformances were recorded, compared with one in 2023. Neither of the incidents was reported to the Norwegian Data Protection Authority. The Authority has imposed no data protection-related orders or sanctions on Eika Boligkreditt.

Eika Boligkreditt’s customers have the right to access their personal data held by the company. A specific routine has been developed for access to personal information stored about an individual. The routine for enquiries from the data subject is intended to ensure that the company complies with its duty to provide information under the individual’s right of access pursuant to the Personal Data Act, and in particular that their personal data is protected against unauthorised access. Eika Boligkreditt’s website contains information about data protection, including its data privacy policy, and contact details concerning enquiries by the data subject.

Green bond framework

Eika Boligkreditt introduced a green bond framework on 4 February 2021. The framework was updated on 2 October 2024. ING Bank was used as an adviser for the framework, ISS ESG conducted a third-party assessment, and Multiconsult has been the adviser for the climate-footprint analyses of the mortgage collateral in the cover pool that is subject to the framework’s reporting requirements.

The purpose of the framework is to finance the most energy-efficient mortgage collateral in the cover pool through the issue of

green bonds. Identification of the most energy-efficient mortgage collateral is based on the following criteria:

- 1. Newer residential properties – built in 2021 or later
 - a. Apartments with a calculated primary energy requirement that is at least 10 per cent lower than the requirement for a near-zero-energy building
 - b. Other small houses with a calculated primary energy requirement that is at least 10 per cent lower than the requirement for a near-zero-energy building
- 2. Older residential properties – built in 2020 or before
 - a. Residential units with a primary energy requirement among the best 15 per cent. Based on the building statistics for 2023, this includes buildings erected in accordance with the technical building regulations applicable from 2010 (TEK10) and those from 2017 (TEK17), as well as buildings with an energy rating of A or B.

Eika Boligkreditt has identified just over 8 304 residential mortgages, worth a total of NOK 20.7 billion, which meet these criteria. 21.4 per cent of the residential mortgages added to the cover pool in 2024 met the criteria set for energy-efficient residential units. The company has established a strategic target that more than 20 per cent of new residential mortgages will finance energy-efficient residential units.

Clarification of the national definition of a near-zero-emission building was provided by the Norwegian government on 31 January 2023. The EU taxonomy distinguishes between requirements for existing (year of construction 2020 or earlier) and new (year of construction 2021 and later) buildings under the environmental goal of limiting GHG emissions. Where new buildings are concerned,



the requirement in the EU taxonomy is an energy efficiency corresponding to near-zero-emission buildings minus 10 per cent. The distinction in the requirements for new and older buildings is the reason we updated our green bond regulations in 2024.

Eika Boligkreditt has issued its first two bonds within the green bond framework. 57 per cent of the green assets in the company’s cover pool have been financed via these two bonds. The green bond framework builds on a portfolio principle, which states that the company must have more green assets in its balance sheet than bonds issued under the framework. The last time Eika Boligkreditt issued a bond under the green bond framework was on 14 September 2022.

Responsible investment

At any given time, Eika Boligkreditt has a substantial portfolio of liquid investments held as part of the requirements it is subject to as a credit institution.

These holdings largely comprise bonds issued by states, banks, financial institutions, local authorities and county councils, in addition to repurchase agreements and deposits in banks with a minimum A-/A3 rating.

Eika Boligkreditt has chosen not to invest in enterprises which the Council on Ethics for the Norwegian Government Pension Fund Global (GPF) has placed on its list of excluded companies. These fall into the following categories:

- serious violations of human rights
- severe environmental damage
- serious violations of the rights of individuals in war or conflict
- gross corruption
- other serious breaches of fundamental ethical norms
- unacceptable GHG emissions
- cluster weapons
- nuclear weapons
- anti-personnel mines
- tobacco production
- sale of military materials to certain states

More information on companies excluded from investment by the GPF may be found here: www.nbim.no/en/the-fund/responsible-investment.

Eika Boligkreditt has also chosen to extend its exclusion list to include all companies in the following industries and sub-industries specified by the global industry classification standard (GICS).

- **Coal** – fossil fuels are significant contributors to adverse climate impacts. Coal-based electricity generation makes a negative contribution to the climate as well as being associated with uncertainties over working conditions and safety in many parts of the world. The company also distances itself from the establishment of new coal mines.
- **Tobacco** – globally, tobacco kills more than 7 million people a year (NHI.no). In addition, it imposes huge health costs and lost production revenues.
- **Gambling** – some people suffer serious problems from an addiction to gambling, which often affects families and children. A large, unregulated and highly opaque gambling market exists internationally. In addition, casino and gambling activities pose a high risk of criminal behaviour, such as money laundering and bribery.
- **Arms production** – armed conflicts are a constant threat in large parts of the world. The arms trade also gives rise to corruption and serious human rights abuses. Eika Boligkreditt will actively disassociate itself from all companies involved in producing, trading and/or maintaining nuclear, biological or chemical weapons, cluster munitions or anti-personnel mines. The same applies to producing, trading and/or maintaining important components for such weapons. Exporting arms to areas where human rights are violated is unacceptable. Nor must profits be made from arms sales at the expense of the primary needs of the inhabitants.

Fund management in Eika is pursued under the vision “So we don’t invest in just anything”. Daily efforts are made to promote sustainability in funds and saving products. This work reflects a long-term strategy and investment philosophy anchored in the UN PRI.

The main purpose of the strategy is to reduce sustainability-related risk in the savings products. It will also ensure that the funds invest in companies which operate responsibly, and which Eika believes offer the best basis for providing a good long-term return for its customers. This also means that Eika does not contribute to financing companies which breach important and fundamental sustainability principles.

Eika Kapitalforvaltning signed the UN PRI in 2021. Together with existing ESG guidelines, this provides a solid foundation and a clear ambition and direction for its sustainability work. Signing the UN PRI commits the company to integrate ESG at all levels in managing and reporting Eika Kapitalforvaltning’s activities, and to implement ESG in the savings and investment products Eika manages. The companies in which the companies invest must also provide satisfactory ESG reports. Furthermore, Eika must be an active owner and collaborate with other investors to promote responsible investments.

Eika Kapitalforvaltning’s ESG guidelines contain more detailed requirements with respect to the companies and business sectors in which it is permitted to invest. This ensures consistency in the requirements set for the various companies in different markets, and documents that Eika is actually doing what it claims to do. The ESG strategy ensures clearer communication concerning ESG



in Eika's funds and buttresses the goal that the company's funds will, over time, be competitive with respect to ESG, compared with equivalent funds and purely environmental funds. In 2024, 99 per cent of Eika Kapitalforvaltning's investments in shares had in-depth ESG data. In 2023, this figure was 98.5 per cent. The carbon

footprint for share investments, measured in tonnes of CO₂ per million USD in revenue, came to 88.0 in 2024, down from 92.1 in 2023. This corresponds to a decrease of 4.1 per cent.

An ESG policy has been drawn up for the liquidity portfolio owned by the alliance banks. This policy is endorsed by 84 per cent of the banks.

Eika Kapitalforvaltning shares information with Eika Boligkreditt about companies and issuers which it has excluded and which do not figure in the list of companies excluded by the GPFG. Eika Boligkreditt also excludes these companies from the management of its liquidity portfolio.

Also excluded via Eika Kapitalforvaltning's investment process are companies that:

- do not endeavour to comply with the following international norms and standards:
- UN Global Compact (UNGC)
- UN Guiding Principles on Business and Human Rights (UNGPs)
- OECD Guidelines for Multinational Enterprises
- have a substantial ESG risk, as classified by Sustainalytics
- have a high or very high carbon footprint, as classified by Sustainalytics
- have been excluded by another major Norwegian equity fund manager This is a requirement for the distribution of Eika funds through the associated group's pension savings platform.

More on the guidelines for ethical investment may be found at <https://www.eika.no/spare/ansvarlige-investeringer>.

Responsible credit

Eika Boligkreditt aims to be a responsible lender and help the local banks adequately fulfil their role as caring advisers for their customers. Responsible lending is important to prevent borrowers assuming greater liabilities than they can service, and to help the local banks support the energy transition by providing their clients with information about sustainability and competitive solutions. Eika Boligkreditt provides residential mortgages to private individuals and mortgages to housing cooperatives. However, its approach to the two customer groups is slightly different.

The fundamental principle of sustainable mortgage lending in the private market is further established in the local banks' sustainable lending strategies and their credit policies with respect to private customers. These requirements are operationalised through Eika Boligkreditt's credit strategy, which describes specific requirements relating to anti-money laundering (AML), the black economy, loan-to-value (LTV) ratio and the customer's risk classification. In this way, the local banks – in partnership with Eika Boligkreditt – help ensure that customers do not take on more debt than they are able to bear.

The local banks also advise customers not to take out loans for certain purposes. This applies, for example, if the customer wishes to borrow money to send to a person or persons unknown, to trigger payment of lottery prizes and inheritances, or other typical scamming methods.

Non-performing engagements

Pursuant to IFRS 9, provision for losses must be recognised on the



basis of the expected credit loss indicated by relevant information available at the reporting date. The retail market is less exposed to losses on lending than other sectors. The company's lending is confined to residential mortgages with a generally low LTV ratio, and is therefore less exposed to loss.

According to Article 178 of the Capital Requirements Regulation (EU) No. 575/2013, an engagement shall be deemed to be in default if a claim is overdue by more than 90 days and the amount is not immaterial (payment default), or if the counterparty is highly unlikely

to be able to meet their obligations with respect to the bank (other delinquency). The company had no engagements overdue by more than 90 days at 31 December 2024. Other delinquencies at 31 December 2024 totalled NOK 7.6 million, equivalent to 0.01 per cent of gross lending.

Loss in the accounts is calculated on the basis of the loss model set out in IFRS 9. Non-performing engagements are presented in step 3, where an individual impairment is to be carried out per customer without the use of models. Credit guarantees provided

by the owner banks, in combination with the low LTV ratio in the cover pool, reduce the provision for loss. The company has calculated an expected loss on residential mortgages of NOK 2.7 million at 31 December 2024, compared with NOK 4.4 million at 31 December 2023. As a result of credit guarantees from the owner banks, amounting to NOK 1.7 billion at 31 December 2024, the company recognised no accounting loss in the fourth quarter 2024.

Green residential mortgages

The Norwegian banking market is highly competitive. If the banks are to win the competition for customers, Eika Boligkreditt must offer competitive products that encourage customers to behave in a climate- and environment-friendly way. Eika Boligkreditt offers green residential mortgages. This product will be continuously developed to ensure it is always relevant in the market. To qualify for one of our green residential mortgages, the property in question must meet the following requirements: energy class A or B. We offer green residential mortgages in connection with the purchase or construction of environment-friendly homes. At 31 December 2024, Eika Boligkreditt's cover pool contained 1 427 green residential mortgages, with a total of NOK 4.74 billion. Green residential mortgages for the upgrading of existing homes to a higher environmental standard, as well as for environment-friendly initiatives resulting in a reduction in energy consumption of at least 30 per cent, were launched in the first quarter of 2021. These are also included in the above-mentioned figure.

Shared credit handbook

The banks in the Eika Alliance have established a shared credit handbook, whose purpose is to reduce the volume of work and

the risk of the individual bank not being sufficiently up to date with respect to compliance with laws and regulations. Eika Boligkreditt and the banks began using the shared credit handbook when it was launched at the start of 2023. The credit handbook is updated regularly and as needed, most recently in the fourth quarter of 2024.

Norwegian Lending Regulation

Both the banks and Eika Boligkreditt are subject to the Norwegian Lending Regulation and follow up their compliance with it. The Lending Regulation's main requirements are:

- **Debt servicing capacity** – the lender must calculate the borrower's ability to service the debt, based on their income and all relevant expenses, including interest and loan principal repayments, and normal living expenses. In assessing the mortgagor's ability to service the mortgage, the mortgagee must allow for an increase of a minimum of three percentage points from the relevant interest rate. The mortgagor's payable interest rate and the increase in the interest rate included in the calculation cannot be less than 7 per cent.
- **Debt-to-asset ratio** – total debt must not exceed five times the mortgagor's annual income.
- **Loan-to-value ratio** – on the date granted, mortgages may not exceed 85 per cent of a reasonable valuation of the residence concerned. With effect from 31 December 2024, this has been amended to 90 per cent of a reasonable valuation of the residence concerned.
- **Instalments** – where a mortgage exceeds 60 per cent of the value of the mortgaged residence, the mortgagee must require an annual repayment of at least 2.5 per cent of the mortgage principal.

The flexibility quota allows a mortgagee to grant mortgages which fall short of the requirements in the Norwegian Lending Regulation for up to 10 per cent of the total mortgages it grants per quarter outside Oslo, and 8 per cent in Oslo. This is followed up and reported at an aggregated level, which means the reporting must cover both mortgages carried on the bank's balance sheet and those which are placed with Eika Boligkreditt.

The Eika School

The alliance has its own Eika School, which is a service for all employees at member banks. Over many years, the Eika School has built up a course programme for bank employees and managers, with a strong focus on active customer care. At the same time, through relevant and targeted tuition, in partnership with the banks and the product companies, students are provided with training that supports Eika's vision as well as broader, sector-wide requirements. The Eika School both produces itself and purchases from third parties training courses relevant for alliance employees. The Eika School offers courses in leadership, anti-money laundering, data privacy and IT security.

Customer complaints

As a general rule, Eika Boligkreditt is not in direct contact with the end customer. By agreement, the bank is the intermediary between Eika Boligkreditt and the customer and thereby the point of contact for the latter. If a customer of the bank wants to make a complaint about aspects of a mortgage held by Eika Boligkreditt, they must do so in writing to the bank. If requested, the bank is required to give the customer information in writing about its complaints-handling procedures, including details about how to complain.

A complaint received by the distributor bank which concerns Eika Boligkreditt must be forwarded in writing to the latter. If the customer has completed the complaint form made available by the individual bank, this is passed on in its entirety to Eika Boligkreditt. The complaint must include the grounds for making it and other possible details relevant to the case.

Eika Boligkreditt has well-established complaints procedures, which are readily accessible to customers. All cases are dealt with by dedicated complaints staff. The banks also conduct quarterly reviews of lessons learnt from complaints in their own internal complaints committees. These assess the need to change policies, routines, marketing and products.

The management system for the product areas is evaluated annually, on the basis of complaints and incidents in the preceding year. There were no customer complaints in 2024, compared with one in 2023.

Loan-to-value (LTV) ratio

As a general rule, loans must be secured with a first preferred mortgage on the main mortgaged property. To the extent that a second preferred mortgage is involved, the sum of the first and second preferred mortgages must not exceed 75 per cent of the mortgaged property's value for residential properties and 50 per cent for holiday homes. At 31 December 2024, the average LTV ratio in the cover pool was 54.0 per cent.

Residence in Norway

The company's credit handbook specifies that, as a general rule, all mortgagors in Eika Boligkreditt must be private customers, but



mortgage finance can also be extended in exceptional circumstances to housing cooperatives. A further condition is that lending must be for residential mortgages, and must therefore be defined separately from commercial finance. Where private mortgagors are concerned, a fundamental requirement is that the mortgage sought can be serviced from income which does not derive from the mortgaged property.

Pursuant to Norwegian law, the mortgagor(s) must be an adult and legally competent at the origination of the mortgage. This means that a mortgagor cannot be under 18 years of age (a minor) or placed under legal guardianship (see section 1 of the Norwegian Guardianship Act). No absolute upper age limit has been set for mortgagors. Mortgagors must also be permanently resident in Norway.

Mortgages for housing cooperatives

Eika Boligkreditt also finances mortgages for housing cooperatives, but these differ in certain respects from ordinary residential mortgages for private individuals. That includes the possibility of a somewhat higher risk concentration. As one of the few issuers of covered bonds offering this type of financing, Eika Boligkreditt has therefore chosen to maintain strict standards related to a good financial position, many residential units and a very low LTV ratio. At 31 December 2024, the average LTV ratio for this type of mortgage in Eika Boligkreditt was 31.0 per cent.

Green residences

Eika Boligkreditt has analysed its cover pool to identify the energy-efficient properties that meet the requirements set in the

green bond framework, popularly called “green residences”. These criteria are based on building standards, energy certificates and refurbishments which provide a minimum 30 per cent improvement in the unit’s energy efficiency. Based on this analysis, there were 8 270 green residential units at 31 December 2024 (8 759 at 31 December 2023), as well as 34 green housing cooperatives, out of a total of 53 964 residential units and 226 housing cooperatives in the cover pool. When analysing the climate footprint of the residential mortgage business, account has been taken of the company’s LTV ratio in each residence. This provides a more accurate picture of the company’s climate footprint and improvements in energy efficiency. Eika Boligkreditt’s overall portfolio had an estimated annual energy requirement of 805 GWh in 2024 (2023: 930 GWh). The mortgage-financed share of the green residences in the cover pool reduced the carbon footprint of the residential units funded by mortgages from Eika Boligkreditt by 8 331 tonnes of CO₂ per annum in 2024 (2023: 9 600 tonnes), compared with if they had been as energy efficient as the average in Norway. [Click here](#) to access the full analysis.

Eika Boligkreditt has performed this analysis primarily because measuring the status of the climate footprint of the assets financed by its mortgages represents a first step towards fulfilling an ambition to reduce this footprint for residential units financed by the company over time. The analysis results will provide input to processes under way in the Eika Alliance with the aim of incorporating climate risk and climate footprint in its credit processes. A secondary motive for such an analysis is to provide a key element in a green framework which the company can use for issuing green bonds.

Measuring climate footprint and risk associated with the residences in the cover pool

In 2020, Eika Boligkreditt started working to establish an internal measurement and reporting regime for continuous monitoring of developments both in the climate footprint mentioned above and in the physical climate risk facing residences in the cover pool. The climate footprint of homes in the cover pool is calculated using the method set out in Finance Norway's "Guide to the Calculation of Financed Greenhouse Gas Emissions" for residential mortgages. The guide has been prepared by Finance Norway's central administration in partnership with a number of the organisation's members. The purpose of the guide is to help standardise the way in which Norwegian financial institutions calculate their financed greenhouse gas emissions.

Eika Boligkreditt utilises energy and climate risk data supplied by Eiendomsverdi in its analyses. Every quarter, the residential mortgage portfolio is run against Eiendomsverdi's registers to obtain updated market values for the residences as well as data on such variables as energy class, area, TEC standard and selected environmental factors per residence. Climate risk data provided by Eiendomsverdi are, in turn, sourced from the Norwegian Mapping Authority, the Norwegian Water Resources and Energy Directorate (NVE) and the Norwegian Geotechnical Institute (NGI).

As mentioned in the previous section, both the total climate footprint and the energy saving made by green residences in the portfolio are estimated on the basis of Eika Boligkreditt's LTV share in the residence. If the company finances 50 per cent of the LTV in a residence, for example, its climate footprint is estimated as half of



that residence's total footprint. This method is also used to estimate the energy saving from green residences. This method reflects a desire to highlight the marginal climate footprint and energy saving contributed by each mortgage krone covered through Eika Boligkreditt.

The company also works actively to map the physical climate risk posed by the mortgage collateral in its cover pool. This work aims initially to identify which residences are vulnerable to damage today and in the future as a result of natural disasters such as floods, landslides and extreme weather events.

Hazard maps are prepared by the Norwegian Water Resources and Energy Directorate (NVE) for quick clay, flooding and landslides in steep terrain, and by the Norwegian Mapping Authority for storm surges (sea levels). The table below breaks down the overall loan value of the mortgage collateral in Eika Boligkredittd's residential mortgage portfolio by the various hazard zone categories.

| Physical climate risk | | | |
|--------------------------|------------|-------|-------------|
| (Figures in NOK million) | | 2024 | Accumulated |
| Flood zone | | 2 808 | 2 808 |
| Flood zone | 20 years | 620 | 620 |
| Flood zone | 50 years | 143 | 763 |
| Flood zone | 100 years | 188 | 951 |
| Flood zone | 200 years | 818 | 1 769 |
| Flood zone | 500 years | 211 | 1 980 |
| Flood zone | 1000 years | 828 | 2 808 |
| Sea level | | 1 263 | 1 263 |
| Storm surge | 20 years | 660 | 660 |
| Storm surge | 200 years | 396 | 1 056 |
| Storm surge | 1000 years | 207 | 1 263 |
| Landslide | | 657 | 657 |
| Mountain hazard zone | 100 years | 29 | 29 |
| Mountain hazard zone | 1000 years | 243 | 272 |
| Mountain hazard zone | 5000 years | 385 | 657 |
| Quick clay | | 3 312 | 3 312 |
| Hazard level high | | 253 | 253 |
| Hazard level medium | | 1 539 | 1 792 |
| Hazard level low | | 1 520 | 3 312 |

Where a year is stated in the hazard zone maps, it denotes how often the risk concerned is expected to materialise and affect buildings in this zone. As demonstrated in the overview above, the

collateral in the company's portfolio has a relatively low exposure to climate-related risks with the highest probability factor.

In areas where climate change is expected to lead to water levels rising by more than 20 per cent, flood zones corresponding to a 200-year flood in 2100 are drawn up. The company's exposure rises by NOK 677 million (from NOK 1 769 million to NOK 2 446 million), an increase of some 40 per cent. Similar calculations are made for storm surge hazard zones in 2050 and 2090. Exposure to a 200-year storm surge in 2090 is calculated at NOK 1 608 million, which corresponds to a rise of NOK 552 million from today's level of NOK 1 056 million. This is an increase of just over 50 per cent. To help the banks make informed decisions, an overall risk score is awarded on the basis of a comprehensive assessment of all the factors involved. This score makes it easy to compare the risk related to the various properties. The aim is for this to help the banks make sustainable decisions. Eiendomsverdi has allocated a risk score to the various physical risk scenarios, as well as a total risk score for physical risk. The scale runs from zero to 6, with 6 representing the highest level of risk. The score is based primarily on 1) the extent to which the property is impacted, and 2) the probability of the various scenarios coming to pass. Damage from natural perils covered by the Norwegian Natural Perils Pool is distributed pro rata between the member insurance companies in accordance with their market share. This method ensures that individual insurance companies are not heavily impacted by natural disasters. However, this arrangement also prevents premiums being differentiated by the risk posed to real property. The Norwegian Natural Perils Pool was established by the government in 1979. It covers damage to real property as a result of storms, floods, landslides, storm surges, earthquakes and

volcanic eruptions. The insurance companies settle claims between themselves through the scheme, while insurance customers deal exclusively with their own insurance provider. Rapid rain bursts have become more common in recent years and are not covered by the Norwegian Natural Perils Pool. According to a report on the climate published by Finance Norway in March 2024, rapid rain bursts have cost almost as much as the damage covered by the Norwegian Natural Perils Pool over the past decade. In the period 2014–2023, compensation for damage caused by natural and weather events totalled NOK 35 billion, CPI-adjusted for buildings and contents. Damage resulting directly from rapid rain bursts is differentiated by price. For example, insurance premiums are higher for houses with flat roofs than for those with pitched roofs. This is because flat-roofed houses suffer more water damage. If rapid rain bursts cause rivers to break their banks, claims arising from such flooding will be settled through the Norwegian Natural Perils Pool.

The Norwegian Mortgagee Guarantee Pool is a collaboration in the insurance sector which aims to safeguard mortgagees (financial or residential mortgage institutions) if a mortgagor has failed to secure the insurance they are required to hold. The guarantee replaces insurance certificates for real property with a normal sales value of NOK 12 million or below, and provides the mortgagee with compensation even if the mortgagor has neglected to secure or maintain insurance. This scheme evens out this risk between the insurance companies. Most companies offering fire insurance are pool members.

According to Eika Boligkredittd's mortgage terms, the mortgaged property must be insured. As a consequence of the insurance

pools described above, the general rule is that the financial risk associated with natural perils falls on the insurance sector and that proactive risk management related to physical climate risk for real property should be pursued by the insurance companies rather than by the mortgagee. The exception will be claims made on mortgage collateral where no insurance is in place and which is not covered by the mortgagee guarantee pool. No cases in Eika Boligkreditt have led to identified loss. The company wants the residual physical risk in its residential mortgage portfolio to be low, and feels this has been achieved through a requirement in its mortgage terms that the mortgaged property be insured.

EU taxonomy

The EU taxonomy for sustainable activities is a classification system that defines which activities support a sustainable economic transition. The taxonomy is intended to guide Eika Boligkreditt's efforts to transition its portfolio and is an important element in its endeavours to move the flow of capital in a more sustainable direction. The company will be encompassed by reporting requirements relating to the EU taxonomy with effect from the 2025 reporting year, when it will also be obliged to comply with the CSRD. The reporting that the company has prepared for the year to 31 December 2024 is voluntary.

The taxonomy comprises six overarching environmental objectives, with each objective having a set of sectors and activities with specific technical criteria. These criteria describe how an activity may make a material positive contribution to the environmental objective. The objectives are:



1. climate change mitigation (reduce and prevent greenhouse gas emissions);
2. climate change adaptation;
3. sustainable use and protection of water and marine resources;
4. transition to a circular economy, waste prevention and recycling;
5. pollution prevention and control; and
6. the protection and restoration of biodiversity and ecosystems.

To classify an activity as sustainable, it must meet the following criteria:

- Make a substantial contribution to at least one of the six environmental objective;

- Do no significant harm to any of the other five environmental objectives (Do No Significant Harm or DNSH);
- Comply with minimum safeguards
- Comply with the technical screening criteria established by the EU Commission.

The Green Asset Ratio (GAR) is the primary performance indicator for credit institutions like Eika Boligkreditt. GAR is calculated on the basis of the company's gross assets. The bulk of the company's assets comprise residential property mortgages, which will largely be encompassed by the taxonomy regulations. Other assets also

covered are the company's derivatives and substitute assets. Exposure to state and supranational issuers must not be included in the calculation of the company's GAR.

The company's lending portfolio aligns with the environmental objectives to mitigate climate change under the EU taxonomy categories 7.2 Renovation of existing buildings and 7.7 Acquisition and ownership of real property. Lending that aligns with building category 7.2 has been kept out of the company's taxonomy, since it would be difficult to determine that these activities do not cause significant harm to any of the other five environmental objectives.

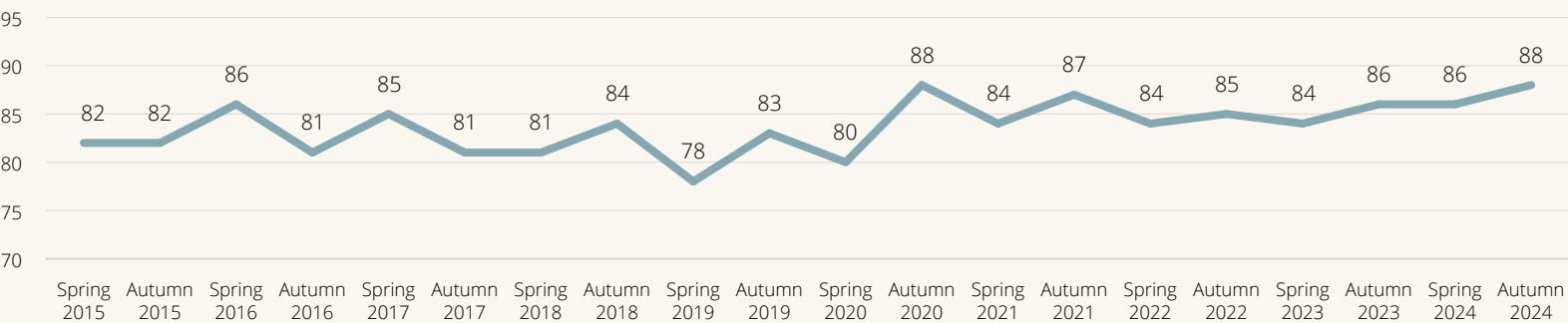
To determine how large a proportion of the residential lending portfolio is taxonomy aligned with building category 7.7, the following method has been used:

- Homes built in or after 2021 must meet the requirement for near-zero-emission buildings, less 10 per cent. Homes larger than 5 000 m² are not included in this criterion.
- Homes built before 2021 must have an energy classification of at least A or be among the 15 per cent most energy efficient homes in Norway.

For both criteria, estimated energy classifications have been taken into account. Each year, Multiconsult helps the company to calculate which homes fulfil the criteria for the company's green lending programme. For more information about the methodology used, see: "Report on Green Residential Buildings": <https://www.eikbol.no/Investor-relations/green-bonds>. This methodology has also been used when calculating Eika Boligkreditt's GAR. Lending with a high climate risk score (6 on a scale of 0–6) is not included in

I am well pleased with the products and services our bank receives from Eika Boligkreditt

Best score is 100



taxonomy-aligned activities when making assessments relating to the Do No Significant Harm (DNSH) criterion.

The table below shows a list of the company's sustainable activities and Green Asset Ratio (GAR).

| | 2024 |
|--|---------|
| Company assets encompassed by the taxonomy | |
| – Taxonomy eligible (NOK mill.) | 101 375 |
| Company assets compliant with the taxonomy | |
| – Taxonomy aligned (NOK mill.) | 20 903 |
| Green Asset Ratio (GAR) (%) | 17.59 |

For more information about the EU taxonomy, see the KPI reporting forms in Annex VI on [page 35](#).

Eika Boligkreditt as a supplier

The company has a clear goal of being predictable and providing a high level of transparency with regard to the processes and changes which occur within the applicable parameters. This is achieved in part through good and clear communication and through placing the needs and risk exposure of the banks at centre stage. A high level of availability and good correspondence between promise and performance are also crucial factors. Eika Boligkreditt works actively to maintain a high score in the annual alliance survey, which measures the satisfaction of the owner banks with the company's deliveries in terms of product and service quality.

Measures are given priority where areas for improvement have been identified. Eika Boligkreditt's ambitious goal for overall

satisfaction by the owner banks is a score of 80 points or more out of 100. The most recent assessment, carried out in the autumn of 2024, gave the company a score of 88 points.

Financial crime

Eika Boligkreditt regards combating financial crime as an important part of its CSR. The purpose of this work in financial institutions is to protect the integrity and stability of the international financial system, undermine the funding of terrorism, and make it harder for criminals to benefit from their crimes. As a credit institution, Eika Boligkreditt has a statutory reporting obligation pursuant to the anti-money laundering (AML) regulations and is also subject to the statutory regulations relating to economic and other sanctions. In its collaboration agreement with the owner banks, the company has outsourced the implementation of customer measures and associated services related to the AML and sanctions regulations in order to ensure that its obligations pursuant to these regulations are discharged by the owner banks as distributors. Eika Boligkreditt has established policies to combat money laundering and the funding of terrorism as well as internal routines for continuous follow-up of customer relationships and transactions in order to identify possible suspicious transactions pursuant to the AML regulations. The company has established electronic monitoring which regularly provides notification of suspicious transactions. These are then followed up, initially with the relevant bank, and if necessary reported to the National Authority for Investigation and Prosecution of Economic and Environmental Crime in Norway (Økokrim). The company reported 26 cases to Økokrim in 2024. Eika Boligkreditt has appointed its own AML officer, who has special responsibility for following up the AML and sanctions regulations.



Employees, equal opportunities and diversity

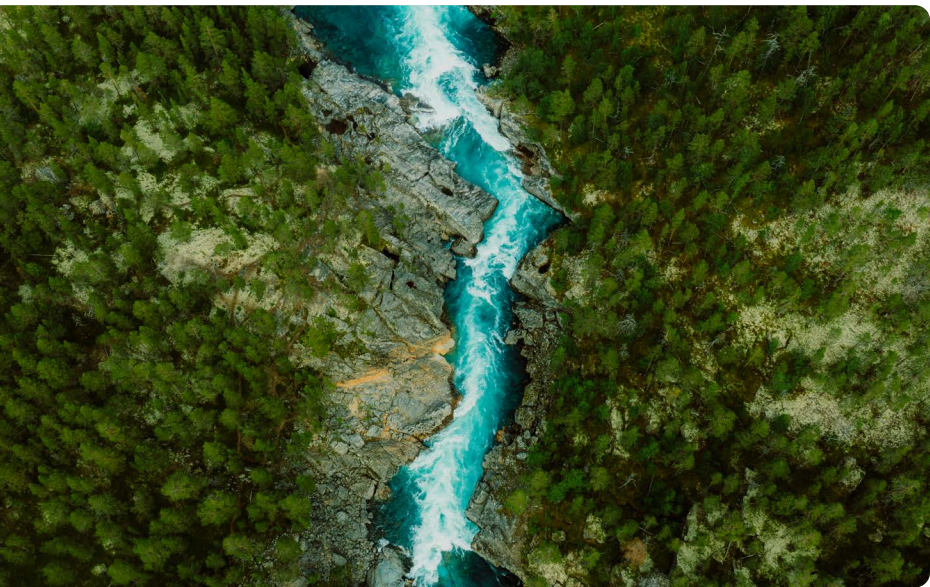
Eika Boligkreditt had 20 permanent, full-time employees at 31 December 2024. In addition, the company has an agreement with Eika Gruppen to purchase services in a number of areas. Eika Boligkreditt's mortgage customers are primarily serviced by the owner banks. The working environment is regarded as good, and no personal injuries or occupational accidents were recorded in the workplace during 2024.

The Eika Alliance has a common digital learning platform (learning management system – LMS), which makes courses and training programmes available to employees. Its own curricula and the finance

industry's certification schemes form the basis for the alliance's goals on and responsibility for developing employee competence. Together with good adviser practice, the industry's procedures and rules as well as the bank's personnel manual form the basis for policies, guidelines and commitments.

The Eika Alliance belongs to the certification scheme for financial advisers, which requires the use of specific programmes for employee development.

Performance and development reviews, as well as competence surveys are important instruments for ensuring employee follow-up



and professional development. The company’s personnel manual specifies that all employees will discuss their development and performance with their immediate superior twice a year.

Eika Boligkreditt strives to maintain a good internal working environment and to ensure that employee rights are safeguarded. This is achieved through extensive cross-departmental work and information flow where appropriate. An employee satisfaction survey (MTU) is also conducted annually. The survey measures performance in 12 different areas. The average score in 2024 was 88, with sub-sector scores ranging from 77 to 94. Survey scores have been very high, and the findings are reviewed and evaluated with a view to further improvements.

In order to be an attractive employer, Eika Boligkreditt offers or covers the cost of a number of benefits over and above those required by law:

- The company covers the difference between full pay and benefits paid by the Norwegian Labour and Welfare Administration (NAV) while on parental leave.
- The company practises flexible working hours.
- Employees are covered by employer’s liability, health and travel insurance paid by the company.
- The company belongs to the AFP early retirement scheme.

Overall sickness absence in 2024 amounted to 7.1 per cent of total hours worked, including long-term sick leave. Eika Boligkreditt aims to be a workplace which:

- is forward-looking and development-oriented.
- contributes to resolving important social challenges.
- contributes to higher participation in work.
- increases value creation and provides a competitive working environment.
- reflects the expectations of the market and society, and is open to new business opportunities.

As a result, the company works actively, purposefully and in a planned manner to promote equal opportunities and prevent discrimination, regardless of gender, pregnancy, parental or adoption leave, carer responsibilities, ethnicity, religion, beliefs, disabilities or medical conditions, union membership, social background, age, political affiliation or sexual orientation. The company’s policy includes regulations on equal opportunities which aim to prevent discriminatory treatment in such areas as pay, promotion and recruitment.

Average female pay as a percentage of the male average is as follows:

| All employees | |
|-----------------------------------|-----|
| Women | 62% |
| Specialists and support functions | |
| Women | 95% |

Women earn on average 62 per cent of the average salary paid to men in the company. This constitutes a pay gap of 38 per cent. The sub-category “specialists and support functions” comprises 15 full-time equivalents, of whom five are women. Here, women earn on average 95 per cent of the average salary paid to their male counterparts. The remaining five employees are members of the company’s executive management team (five men). Lower average pay for women in the company reflects differences in length of service and level of responsibility. The company also has relatively few employees, which may produce substantial variations in average pay for each group.

Eika Boligkreditt has concluded a company-specific agreement in addition to the main agreement and the central agreement negotiated between Finance Norway and the Finance Sector Union of Norway. The company agreement covers all employees except the CEO and other senior executives. 15 per cent of the company’s employees are members of the Finance Sector Union of Norway. Most of the company’s senior executives are men (five men and no women). Among specialists and support functions, there are 10 men and five women. As described above, Eika Boligkreditt aims to promote equality and diversity. Its specialised mandate on behalf of the owner banks requires leading-edge expertise. Most

of the company's employees therefore have higher education, and qualifications corresponding to a master's degree are sought when recruiting staff.

Because it also has relatively few directly-employed personnel, Eika Boligkreditt has chosen the following KPIs in relation to equality and diversity – gender balance for employees in the company in the short term ≥ 30 percent and in the long term ≥ 40 percent, gender balance in the board at 40 percent, and an ambition of internal promotion to senior positions where qualitative assessments are made.

One internal promotion was made in 2024. At the end of the year, women accounted for 25 per cent of the workforce and 50 per cent of the board. All other things being equal, it would be desirable to increase these proportions when making new appointments and when electing new directors. This could help to increase the gender balance in the company's management, control bodies and board sub-committees.

Three new employees joined the company in 2024 and one employee resigned their position. The age and gender composition was as follows:

| Appointments | < 30 years | 30–40 | 41–50 | < 50 years |
|--------------|------------|-------|-------|------------|
| Women | 1 | – | – | – |
| Men | – | 2 | – | – |

| Resignations | < 30 years | 30–40 | 41–50 | < 50 years |
|--------------|------------|-------|-------|------------|
| Women | – | – | – | – |
| Men | – | 1 | – | – |

Since one employee resigned their position in 2024, the staff turnover at Eika Boligkreditt came to 5.2 per cent. At the close of 2024, Eika Boligkreditt employed 20 FTEs.

The age distribution between women and men by job category breaks down as follows:

| Senior executives | < 30 years | 30–40 | 41–50 | < 50 years |
|-------------------|------------|-------|-------|------------|
| Women | – | – | – | – |
| Men | – | – | 1 | 4 |

| Specialists and support functions | < 30 years | 30–40 | 41–50 | < 50 years |
|-----------------------------------|------------|-------|-------|------------|
| Women | 1 | 2 | – | 2 |
| Men | 3 | 5 | 2 | – |

| Board members | < 30 years | 30–40 | 41–50 | < 50 years |
|---------------|------------|-------|-------|------------|
| Women | – | – | – | 3 |
| Men | – | – | 1 | 2 |

Ethics and anti-corruption

Along with the rest of the Eika Alliance, Eika Boligkreditt depends on maintaining public trust and a good reputation. A great responsibility accordingly rests both on the company and on the individual employee to act ethically towards customers, owner banks, investors, partners, colleagues and the world at large. The purpose of the ethical guidelines (code of conduct) is to describe the company's ethical standards.

All Eika Boligkreditt's employees must behave and work in compliance with applicable legislation, statutory regulations and internal

guidelines. They are all expected to perform their work in an ethical and socially acceptable manner, and in line with the company's core values of being reliable, engaged and brave.

In any given situation, the ethical response is often not entirely clear cut. As a possible guide, the following questions should be answered with an unqualified "yes":

- Would I dislike it if management and my co-workers found out about this?
- Could this in any way undermine trust in Eika Boligkreditt or the alliance if it were to be reported in the media?
- Could the action conflict with the interests I am charged with protecting as an employee of EBK, or be perceived as a benefit I am receiving by virtue of my position?

The guidelines regulate such matters as the individual employee's relationship with customers, suppliers, competitors and the world at large. All employees must avoid forming any kind of dependent relationship with customers or business connections, and must be fully conscious of attempts at corruption or forms of influence-peddling. The ethical guidelines make the company's zero tolerance of corruption clear, and employees must in no circumstances give or receive any form of inappropriate benefit – direct or indirect – through or in connection with Eika Boligkreditt's business operations. All new employees are required to familiarise themselves with the ethical guidelines as part of their induction process. [Click here](#) to access the guidelines.

In addition to the ethical guidelines, the company has established a separate whistleblowing policy. Eika Boligkreditt believes that



openness and good communication in the organisation promote the workplace culture. The company therefore wishes to facilitate a corporate culture where wrongdoing (also known as censurable conditions) and irregularities are reported, discussed and resolved. The whistleblowing procedure, which complies with the requirements of Norway's Working Environment and Transparency Acts, helps to support an open culture where trust and dialogue prevail

between employees and managers. This procedure is updated as required to comply with new provisions for notifying irregularities in the business. Its purpose is to reduce the risk of internal wrongdoing and to take care of the employee's right and duty to voice their concerns and blow the whistle on censurable conditions in the workplace. The procedure can therefore help to promote respect for fundamental human rights and decent working conditions in

the company. Examples of irregularities which could form the basis for whistleblowing are provided in the procedure. These include inappropriate behaviour, corruption, illegal acts, financial crime, unethical or damaging activity, or breaches of other ethical norms, fundamental human rights and decent working conditions. The whistleblowing procedure also makes provision for employees to notify anonymously if they so wish. Eika Boligkreditt received no whistleblowing notifications in 2024. A breakdown of the whistleblowing notifications received in the past three years is presented below.

| Notifications received | 2022 | 2023 | 2024 |
|------------------------|------|------|------|
| No. | 1 | – | – |

Environment- and climate-friendly operations

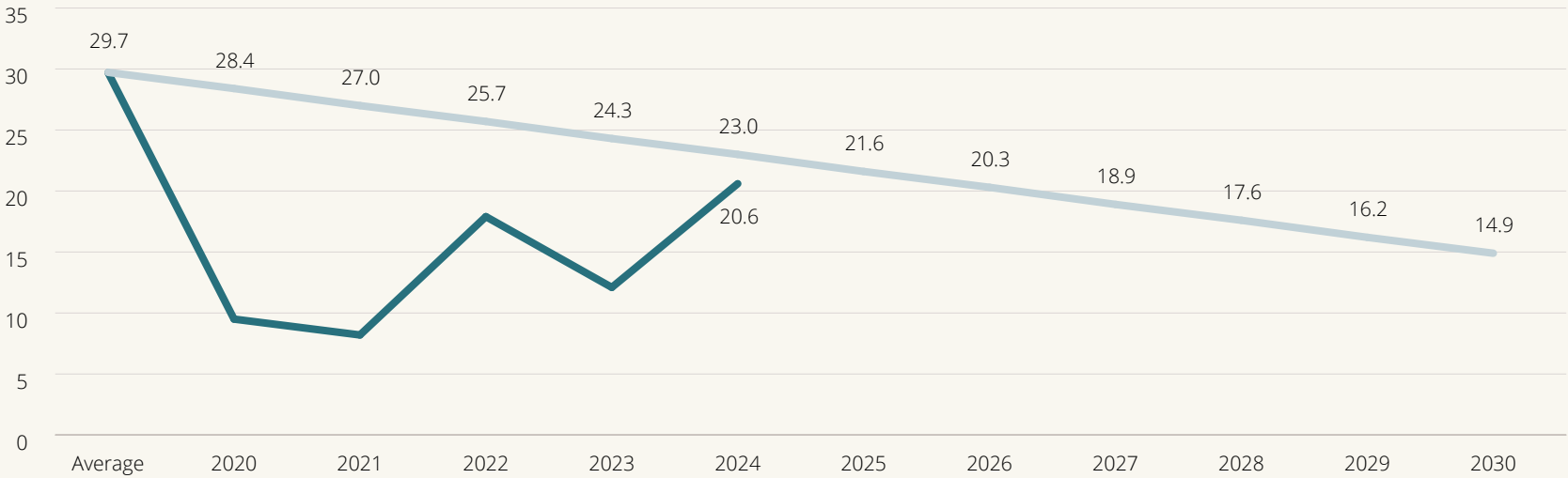
Eika Boligkreditt wishes to have the smallest possible adverse impact on the natural environment, and entered into an agreement in 2013 with Cemasy.

The company leases premises from Eika Gruppen, which obtained Eco-Lighthouse certification for its offices for the first time in 2021. Among other things, the Eco-Lighthouse scheme sets standards for HSE, procurements, energy consumption and waste management. Eco-Lighthouse certification must be renewed every three years. Eika Gruppen was recertified in 2024.

The owner banks are widely spread geographically, which has been a contributory factor in Eika Boligkreditt's extensive and growing use of video and web conferencing in connection with training and information flow. This not only safeguards the environment but also reduces unnecessary travel time and strain in a busy day.

Goal annual GHG emissions towards 2030

Tonnes of carbon equivalent



Eika Boligkreditt has a conscious attitude to the use of paper and electronic templates and documents, as well as to postage costs. Reducing paper consumption to a necessary minimum is a clear objective.

Overviews of the company's GHG emissions and energy consumption have been prepared for 2022, 2023 and 2024. These analyses are based on direct and indirect usage related to Eika Boligkreditt's activities. The company's total GHG emissions in 2024 are estimated to equal 20.6 tonnes of CO₂ equivalents. This represents an increase of 70 per cent compared with 2023. The change relates primarily to an increase in business travel. The board has established a management

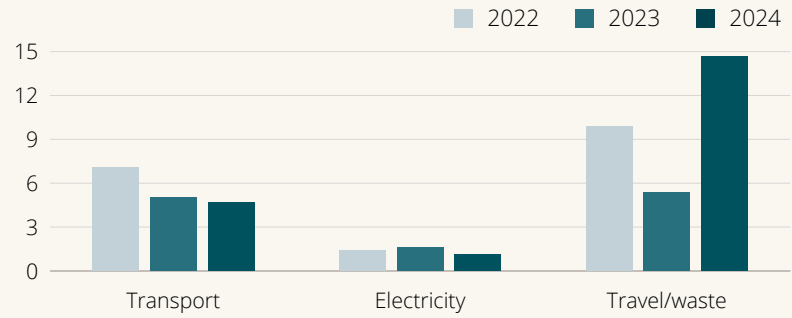
indicator for the company's overall GHG emissions (Scope 1, Scope 2 and Scope 3 business travel and waste), in which the desired development trajectory represents a 50 per cent reduction in emissions in the years to 2030 compared with the average for the period 2012–2019. [Click here](#) to access the full analysis. The company includes its funded emissions in the climate analysis.

To ensure that the goal for 2030 is reached, the company has specified an annual sub-goal. This was set at 23 tonnes of CO₂ equivalents for 2024. The climate footprint provides a general overview of the organisation's GHG emissions, converted into

Annual GHG emissions

Tonnes of carbon equivalent

| | 2022 | 2023 | 2024 |
|--------------|------|------|------|
| Transport | 7.1 | 5.0 | 4.7 |
| Electricity | 1.4 | 1.6 | 1.1 |
| Travel/waste | 9.9 | 5.4 | 14.7 |
| Total | 18.4 | 12.1 | 20.6 |



tonnes of CO₂ equivalents, and rests on information sourced from both internal and external systems. This analysis has been conducted in accordance with the GHG Protocol Initiative (GHG Protocol), an international standard developed by the World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD). It ranks today as the most important standard for measuring an enterprise's GHG emissions. The protocol divides the amounts released into three main segments or scopes, which include both direct and indirect emissions. Reporting takes account of the following GHGs: CO₂, CH₄ (methane), N₂O (nitrous oxide), SF₆, NF₃, HFCs and PFCs.



Responsible procurement

Eika Boligkreditt has established a procurement policy which requires all purchasing agreements entered into to include documented CSR. The policy also covers the purchase of goods and services for use by Eika Boligkreditt. Eika Gruppen has established procurement procedures that also cover purchases made on behalf of Eika Boligkreditt.

The company's procurement must accord with the following general principles:

- Purchases must be environment-friendly and sustainable, and must focus on the product's lifespan and lifecycle, for example with respect to recycling.
- The company must ensure that contracts for the purchase of goods and services are entered into on the best possible terms, and its purchases must be as cost-efficient as possible.
- Eika Boligkreditt must maintain the integrity of its procurement processes in relation to applicable regulations, and primarily make purchases on the basis of competitive tendering.
- Procurement processes must meet requirements for equal treatment, predictability, transparency and verifiability.
- In its procurement processes, Eika Boligkreditt must ensure that no questions can be raised concerning conflicts of interest arising from the relationship between its employees and the supplier company or their personal interests. The company has established a policy for dealing with conflicts of interest.

Eika Boligkreditt's suppliers must comply with national and international legislation and regulations, as well as internationally recognised principles and guidelines. These include provisions

related to human and labour rights, the environment, corruption, AML and the funding of terrorism. They must also see to it that any subcontractors comply with the same principles and rules.

Suppliers must self-certify that they comply with the obligations specified in the guidelines, and have a duty to notify Eika Boligkreditt in the event of actual or suspected breaches of these. Breach of these provisions may be grounds for cancelling the contract concerned. [Click here](#) to access the guidelines.

Eika Gruppen is both a major supplier to Eika Boligkreditt and the local banks, and responsible for substantial procurements on their behalf. Eika Gruppen is certified in accordance with the Eco-Lighthouse scheme. Part of the certification process relates to procurement processes and suppliers. As a result of the Eco-Lighthouse certification of Eika Gruppen AS, a substantial proportion of purchases made in the Eika Alliance will be quality-assured to this standard.

Pursuant to the Norwegian Transparency Act, the company is required to conduct due diligence assessments in line with the OECD's Guidelines for Multinational Enterprises in order to safeguard fundamental human rights and decent working conditions in its operations. Due diligence may be described as a process where a company identifies, prevents, restricts and accounts for its handling of existing and potential negative consequences of its business. Such assessments must be carried out regularly and be proportionate to the undertaking's size and nature, the context in which it operates, and the level of seriousness and probability of negative consequences for

fundamental human rights and decent working conditions. As part of the process, Eika Boligkreditt identifies and assesses actual and potential negative consequences for fundamental human rights and decent working conditions which its business has either caused or contributed to, or which are directly related to its business, products or services through the value chain or business partners.

Eika Boligkreditt has a low risk profile, and its business is conducted exclusively in Norway, with strict requirements applied for environmental protection and social rights. The company wishes to contribute to sustainable development of the environment, people and society, which includes taking responsibility for fundamental human rights and decent working conditions being respected in connection with its business. Eika Boligkreditt's suppliers and business associates provide written confirmation that they will comply with its procurement policy. Furthermore, business associates receive a questionnaire when a commercial relationship is established, which is reassessed regularly and ensures that Eika Boligkreditt is able to conduct a detailed survey of the associate's impact. Due diligence assessments by the company have not identified actual negative consequences or significant risk of such outcomes for fundamental human rights and decent working conditions in the business.

The due diligence processes are broadly entrenched in the company, and all managers provide annual confirmation that the requirements of the Transparency Act have been met in their area of activity. Overleaf, you can read the company's statement on due diligence, pursuant to the Norwegian Transparency Act.



Eika Boligkreditt AS’

Statement on due diligence pursuant to the Norwegian Transparency Act

for 1 January–31 December 2024

1. General information about Eika Boligkreditt AS (Eika Boligkreditt)

a. Organisation

Eika Boligkreditt is a credit institution which, at 31 December 2024, was owned by 56 banks. Its main purpose is to ensure that the local banks in the Eika Alliance have access to long-term and competitive funding by issuing covered bonds in the Norwegian and international financial markets.

Eika Boligkreditt is part of the Eika Alliance. The Eika Alliance comprises 47 local banks, the Eika Gruppen AS financial group and Eika Boligkreditt. The banks are spread over much of Norway, and contribute to economic growth, security and development in their respective market areas. Collaboration through the alliance provides them with substantial economies of scale. The Eika Alliance is therefore one of the biggest players in the Norwegian financial market and an important corporate citizen in many local communities in Norway.

An important aspect of Eika Boligkreditt’s business concept is to increase the owner banks’ competitiveness and reduce their risk. At the close of 2024, the banks had transferred a total of NOK 104.7 billion in residential mortgages to Eika Boligkreditt, thereby easing the banks’ own financing requirements by an equivalent amount.

Eika Boligkreditt had 20 permanent employees at 31 December 2024. In addition, the company has entered into an agreement with Eika Gruppen AS concerning the purchase of services in a number of areas.

b. Products and services

The company’s main purpose is to ensure that its owner banks have access to long-term and competitive funding by issuing covered bonds in the Norwegian and international financial markets. The company is licensed as a credit institution and authorised to raise debt in the market through the issuance of covered bonds.

The company exclusively offers residential mortgages with a loan-to-value (LTV) ratio of no more than 75 per cent for houses/ apartments and 60 per cent for joint debt in housing cooperatives. The company offers two different mortgage lending products: mortgages at a variable rate of interest, or, alternatively, at a fixed rate with a lock-in period of three, five or ten years.

c. The company’s markets

The company finances its owner banks by issuing internationally rated covered bonds. By virtue of its size, Eika Boligkreditt is able to raise loans in both Norwegian and international financial markets, and to seek financing wherever the best market terms can be obtained at any given time. Eika Boligkreditt ensures that the local banks have access to financing on roughly the same terms as the major banks in the Norwegian market. Eika Boligkreditt consequently plays an important role in reducing financing risk for the local banks, while helping to ensure that their customers achieve competitive residential mortgage terms, by securing competitive financing for its owner banks.

d. Foundation for the work relating to human rights and decent working conditions

Eika Boligkreditt is subject to the Norwegian Transparency Act, which went into force in 2022. The company's board of directors, as the company's highest management authority, is responsible for ensuring compliance with the Transparency Act's provisions.

Eika Boligkreditt is working actively to ensure it has a responsible value chain. Since 2020, the company has had a Procurement Policy, with associated self-declaration forms that suppliers and business partners must complete to confirm in writing that they comply with the company's guidelines. As a consequence of the Transparency Act, and to ensure compliance with its provisions, Eika Boligkreditt revised its Procurement Policy and Whistleblowing Policy in advance of the Act coming into force. The policies are adopted by the board of directors. The company's Procurement Policy and Whistleblowing Policy may be found at www.eikbol.no/About-us/ESG. The company also has a Privacy Policy covering the processing of personal data.

The company's Whistleblowing Policy has been adopted to ensure transparency and good communication within the organisation, which also promotes a good corporate culture. Eika Boligkreditt wishes to facilitate a corporate culture where wrongdoing (also known as censurable conditions) and irregularities are reported, discussed and resolved. The whistleblowing routines, which comply with the requirements of Norway's Working Environment and Transparency Acts, help to support an open culture, where trust and dialogue prevail between employees and managers.

The company wishes to contribute to the sustainable development of the environment, people and society, which includes taking responsibility for ensuring that fundamental human rights and decent working conditions are respected in connection with its business.

Pursuant to the Norwegian Transparency Act, the company is required to conduct due diligence assessments in line with the OECD's Guidelines for Multinational Enterprises in order to safeguard fundamental human rights and decent working conditions in its operations. As part of this process, Eika Boligkreditt identifies and assesses actual and potential negative consequences for fundamental human rights and decent working conditions which its business has either caused or contributed to, or which are directly related to its business, products or services through the supply chain or business partners. The company therefore takes a risk-based approach to its due diligence processes, which cover Eika Boligkreditt's in-house operations and those of its external supply chain and business partners. These due diligence processes are broadly entrenched in the company, and all managers provide annual confirmation that the requirements of the Transparency Act have been met in their area of activity.

Eika Boligkreditt requires that suppliers and business partners (in the following collectively referred to as "suppliers") comply with national and international laws and regulations, as well as internationally recognised principles and guidelines. All suppliers are also required to help Eika Boligkreditt obtain the information it needs to follow up and perform due diligence on suppliers. This may, for example, include responding to questionnaires on ESG-related

matters. New suppliers must self-certify their compliance with internationally recognised principles and guidelines, laws or regulations relating to human and labour rights, environmental protection, corruption prevention and anti-money laundering (AML). Suppliers also have a duty to notify Eika Boligkreditt of any violation or suspected violation these provisions. In the event of any serious violation, Eika Boligkreditt is entitled to cancel its contract with the supplier concerned. If necessary, Eika Boligkreditt may ask suppliers to document their compliance.

The company has opened a page on its website called "Transparency", which contains relevant information concerning the Norwegian Transparency Act. For further details, see www.eikbol.no/About-us/ESG/apenhet. This page includes a list of Eika Boligkreditt's key suppliers.

e. Whistleblowing channels and grievance mechanisms

As mentioned above, Eika Boligkreditt has several internal guidelines which describe the whistleblowing procedures the company applies in different situations. The whistleblowing procedures are updated as required to take account of new provisions for reporting suspected wrongdoing in the enterprise.

Third parties wishing to report wrongdoing or make a complaint can send their submission to Eika Boligkreditt at compliance.ebk@eika.no. Eika Boligkreditt's contact details may always be found at the bottom of the company's website www.eikbol.no, or at www.eikbol.no/Contact-us/Address.

2. Negative consequences and risk

In 2024, the company's due diligence processes did not identify any actual negative consequences, or material risks thereof, with respect to fundamental human rights and decent working conditions in the business. This is based on an assessment of both the company's in-house operations and those of its suppliers.

The company's due diligence assessments show a consistently low risk for all the evaluated risk factors/areas. Since the company has exclusively identified a low risk, this is also reflected in the level of the investigations and inquiries that it has found necessary to perform. The company conducts annual due diligence assessments, and all managers provide confirmation that the requirements of the Transparency Act have been met in their areas of activity.

3. Initiatives

The company has not identified any actual negative consequences, or material risks thereof, with respect to fundamental human rights and decent working conditions in the reporting period. The

company has therefore not been obliged to take steps to deal with cases involving negative consequences or material risk.

The company's due diligence assessments show the risk relating to all the risk areas evaluated areas is low. The fact that the company operates exclusively in Norway, where there are high environmental and social standards, also contributes to its low risk profile.

The company finds that the Transparency Act and its associated legal obligations have been incorporated into its governing documents and management tools. Nevertheless, the company considers further practical experience and training in the implementation of due diligence processes and the follow up of relevant initiatives to be important. This is an area for continuous endeavour in the company's business operations and procurement processes.

For further information, please contact the company at the following email address: compliance.ebk@eika.no.

This statement on due diligence was considered and adopted by the Board of directors on 12 March 2025.

Rune Iversen
Chair

Geir Magne Tjøland

Terje Svendsen

Gro Furunes Skårsmoen

Lena Jørundland

Kristin Steinfeldt-Foss

Odd-Arne Pedersen
CEO

Taxonomy Regulation Annex VI – KPIs for credit institutions

0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation

| | | Total environmentally sustainable assets | KPI ⁴ | KPI ⁵ | % coverage (over total assets) ³ |
|----------|-------------------------------|--|------------------|------------------|---|
| Main KPI | Green asset ratio (GAR) stock | 20 903 | 17.59% | N/A | 93.87% |

| | | Total environmentally sustainable assets | KPI ⁴ | KPI ⁵ | % coverage (over total assets) ³ |
|-----------------|--|--|------------------|------------------|---|
| Additional KPIs | GAR (flow) | 6 225 | 18.04% | N/A | 84.25% |
| | Trading book ¹ | N/A | N/A | N/A | |
| | Financial guarantees | N/A | N/A | N/A | |
| | Assets under management | N/A | N/A | N/A | |
| | Fees and commissions income ² | N/A | N/A | N/A | |

¹ For credit institutions that do not meet the conditions of Article 94(1) of the CRR or the conditions set out in Article 325a(1) of the CRR

² Fees and commissions income from services other than lending and AuM
Institutions shall disclose forwardlooking information for this KPIs, including information in terms of targets, together with relevant explanations on the methodology applied.

³ % of assets covered by the KPI over banks’ total assets

⁴ Based on the Turnover KPI of the counterparty

⁵ Based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used

1.Assets for the calculation of GAR (Turnover)

| NOK million | | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o | p | |
|-------------|---|-----------------------------|--|-----------------------|-------------------|--------|-----|---|--|---------------------|-------------------|---|---------|--------------------------|--|-------------------|-----|--|
| | | Total gross carrying amount | 31 December 2024 | | | | | | | | | | | | | | | |
| | | | Climate Change Mitigation (CCM) | | | | | | Climate Change Adaptation (CCA) | | | | | | TOTAL (CCM + CCA) | | | |
| | | | Of which towards taxonomy relevant sectors (Taxonomy-eligible) | | | | | | Of which towards taxonomy relevant sectors (Taxonomy-eligible) | | | | | | Of which towards taxonomy relevant sectors (Taxonomy-eligible) | | | |
| | | | Of which environmentally sustainable (Taxonomy-aligned) | | | | | | Of which environmentally sustainable (Taxonomy-aligned) | | | | | | Of which environmentally sustainable (Taxonomy-aligned) | | | |
| | | | Of which Use of Proceeds | Of which transitional | Of which enabling | | | | Of which Use of Proceeds | Of which adaptation | Of which enabling | | | Of which Use of Proceeds | Of which transitional | Of which enabling | | |
| | GAR - Covered assets in both numerator and denominator | | | | | | | | | | | | | | | | | |
| 1 | Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation | 112 015 | 101 375 | 20 903 | – | 20 673 | 230 | – | – | – | – | – | 101 375 | 20 903 | – | 20 673 | 230 | |
| 2 | Financial undertakings | 3 959 | 3 959 | 230 | – | – | 230 | – | – | – | – | – | 3 959 | 230 | – | – | 230 | |
| 3 | Credit institutions | 3 959 | 3 959 | 230 | – | – | 230 | – | – | – | – | – | 3 959 | 230 | – | – | 230 | |
| 4 | Loans and advances | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 5 | Debt securities, including UoP | 3 959 | 3 959 | 230 | – | – | 230 | – | – | – | – | – | 3 959 | 230 | – | – | 230 | |
| 6 | Equity instruments | – | – | – | | – | – | – | – | | – | – | – | – | | – | – | |
| 7 | Other financial corporations | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 8 | of which investment firms | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 9 | Loans and advances | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 10 | Debt securities, including UoP | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 11 | Equity instruments | – | – | – | | – | – | – | – | | – | – | – | – | | – | – | |
| 12 | of which management companies | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 13 | Loans and advances | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 14 | Debt securities, including UoP | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 15 | Equity instruments | – | – | – | | – | – | – | – | | – | – | – | – | | – | – | |
| 16 | of which insurance undertakings | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 17 | Loans and advances | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 18 | Debt securities, including UoP | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 19 | Equity instruments | – | – | – | | – | – | – | – | | – | – | – | – | | – | – | |
| 20 | Non-financial undertakings | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 21 | Loans and advances | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 22 | Debt securities, including UoP | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 23 | Equity instruments | 61 | – | – | | – | – | – | – | | – | – | – | – | | – | – | |
| 24 | Households | 104 638 | 97 416 | 20 673 | – | 20 673 | – | – | – | – | – | – | 97 416 | 20 673 | – | 20 673 | – | |
| 25 | of which loans collateralised by residential immovable property | 104 638 | 97 416 | 20 673 | – | 20 673 | – | – | – | – | – | – | 97 416 | 20 673 | – | 20 673 | – | |
| 26 | of which building renovation loans | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 27 | of which motor vehicle loans | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 28 | Local governments financing | 3 418 | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 29 | Housing financing | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 30 | Other local government financing | 3 418 | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 31 | Collateral obtained by taking possession: residential and commercial immovable properties | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |

| NOK million | | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o | p | |
|---|--|-----------------------------|--|--------|---|--------|-----|---|--|---------------------|-------------------|---|---------|--|-----------------------|-------------------|-----|--|
| | | Total gross carrying amount | 31 December 2024 | | | | | | | | | | | | | | | |
| | | | Climate Change Mitigation (CCM) | | | | | | Climate Change Adaptation (CCA) | | | | | TOTAL (CCM + CCA) | | | | |
| | | | Of which towards taxonomy relevant sectors (Taxonomy-eligible) | | | | | | Of which towards taxonomy relevant sectors (Taxonomy-eligible) | | | | | Of which towards taxonomy relevant sectors (Taxonomy-eligible) | | | | |
| | | | Of which environmentally sustainable (Taxonomy-aligned) | | | | | | Of which environmentally sustainable (Taxonomy-aligned) | | | | | Of which environmentally sustainable (Taxonomy-aligned) | | | | |
| | Of which Use of Proceeds | Of which transitional | Of which enabling | | | | | | Of which Use of Proceeds | Of which adaptation | Of which enabling | | | Of which Use of Proceeds | Of which transitional | Of which enabling | | |
| 32 | Assets excluded excluded from the numerator for GAR calculation (covered in the denominator) | 6 789 | | | | | | | | | | | | | | | | |
| 33 | Financial and non-financial undertakings | - | | | | | | | | | | | | | | | | |
| 34 | SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations | - | | | | | | | | | | | | | | | | |
| 35 | Loans and advances | - | | | | | | | | | | | | | | | | |
| 36 | of which loans collateralised by commercial immovable property | - | | | | | | | | | | | | | | | | |
| 37 | of which building renovation loans | - | | | | | | | | | | | | | | | | |
| 38 | Debt securities | - | | | | | | | | | | | | | | | | |
| 39 | Equity instruments | - | | | | | | | | | | | | | | | | |
| 40 | Non-EU country counterparties not subject to NFRD disclosure obligations | - | | | | | | | | | | | | | | | | |
| 41 | Loans and advances | - | | | | | | | | | | | | | | | | |
| 42 | Debt securities | - | | | | | | | | | | | | | | | | |
| 43 | Equity instruments | - | | | | | | | | | | | | | | | | |
| 44 | Derivatives | 5 349 | | | | | | | | | | | | | | | | |
| 45 | On demand interbank loans | - | | | | | | | | | | | | | | | | |
| 46 | Cash and cash-related assets | 1 169 | | | | | | | | | | | | | | | | |
| 47 | Other assets (e.g. Goodwill, commodities etc.) | 270 | | | | | | | | | | | | | | | | |
| 48 | Total GAR assets | 118 804 | 101 375 | 20 903 | - | 20 673 | 230 | - | - | - | - | - | 101 375 | 20 903 | - | 20 673 | 230 | |
| 49 | Assets not covered for GAR calculation | 7 762 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | |
| 50 | Central governments and Supranational issuers | 7 762 | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | |
| 51 | Central banks exposure | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | |
| 52 | Trading book | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | |
| 53 | Total assets | 126 566 | 101 375 | 20 903 | - | 20 673 | 230 | - | - | - | - | - | 101 375 | 20 903 | - | 20 673 | 230 | |
| Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations | | | | | | | | | | | | | | | | | | |
| 54 | Financial guarantees | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | |
| 55 | Assets under management | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | |
| 56 | Of which debt securities | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | |
| 57 | Of which equity instruments | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | |

2. GAR – Sector information (Turnover)

| Breakdown by sector - NACE 4 digits level (code and label) | | a | b | c | d | e | f | g | h | y | z | aa | ab |
|--|---|--|--|--|--|--|--|--|--|--|--|--|--|
| | | Climate Change Mitigation (CCM) | | | | Climate Change Adaptation (CCA) | | | | TOTAL (CCM + CCA) | | | |
| | | Non-Financial corporates (Subject to NFRD) | | SMEs and other NFC not subject to NFRD | | Non-Financial corporates (Subject to NFRD) | | SMEs and other NFC not subject to NFRD | | Non-Financial corporates (Subject to NFRD) | | SMEs and other NFC not subject to NFRD | |
| | | Gross carrying amount | | Gross carrying amount | | Gross carrying amount | | Gross carrying amount | | Gross carrying amount | | Gross carrying amount | |
| | | NOK million | Of which environmentally sustainable (CCM) | NOK million | Of which environmentally sustainable (CCM) | NOK million | Of which environmentally sustainable (CCA) | NOK million | Of which environmentally sustainable (CCA) | NOK million | Of which environmentally sustainable (CCM + CCA) | NOK million | Of which environmentally sustainable (CCM + CCA) |
| 1 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 2 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 3 | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 4 | - | - | - | - | - | - | - | - | - | - | - | - | - |

3. GAR KPI Stock (Turnover)

| % (compared to total covered assets in the denominator) | | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o | p | |
|---|---|--|--------------------------|---------------------|-------------------|--------------------------|--|-------------------|---|---|---|--|-------|---|-------|------|-------|------------------------------------|
| | | 31 December 2024 | | | | | | | | | | | | | | | | |
| | | Climate Change Mitigation (CCM) | | | | | Climate Change Adaptation (CCA) | | | | | TOTAL (CCM + CCA) | | | | | | Proportion of total assets covered |
| | | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) | | | | | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) | | | | | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) | | | | | | |
| | | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned) | | | | | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned) | | | | | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned) | | | | | | |
| Of which Use of Proceeds | Of which transitional | Of which enabling | Of which Use of Proceeds | Of which adaptation | Of which enabling | Of which Use of Proceeds | Of which transitional | Of which enabling | | | | | | | | | | |
| 1 | GAR - Covered assets in both numerator and denominator | | | | | | | | | | | | | | | | | |
| 1 | Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation | 90.50 | 18.66 | – | 18.46 | 0.21 | – | – | – | – | – | 90.50 | 18.66 | – | 18.46 | 0.21 | 94.29 | |
| 2 | Financial undertakings | 100.00 | 5.80 | – | – | 5.80 | – | – | – | – | – | 100.00 | 5.80 | – | – | 5.80 | 3.33 | |
| 3 | Credit institutions | 100.00 | 5.80 | – | – | 5.80 | – | – | – | – | – | 100.00 | 5.80 | – | – | 5.80 | 3.33 | |
| 4 | Loans and advances | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 5 | Debt securities, including UoP | 100.00 | 5.80 | – | – | 5.80 | – | – | – | – | – | 100.00 | 5.80 | – | – | 5.80 | 3.33 | |
| 6 | Equity instruments | – | – | | – | – | – | – | | – | – | – | – | | – | – | – | |
| 7 | Other financial corporations | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 8 | of which investment firms | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 9 | Loans and advances | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 10 | Debt securities, including UoP | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 11 | Equity instruments | – | – | | – | – | – | – | | – | – | – | – | | – | – | – | |
| 12 | of which management companies | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 13 | Loans and advances | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 14 | Debt securities, including UoP | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 15 | Equity instruments | – | – | | – | – | – | – | | – | – | – | – | | – | – | – | |
| 16 | of which insurance undertakings | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 17 | Loans and advances | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 18 | Debt securities, including UoP | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 19 | Equity instruments | – | – | | – | – | – | – | | – | – | – | – | | – | – | – | |
| 20 | Non-financial undertakings | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 21 | Loans and advances | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 22 | Debt securities, including UoP | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 23 | Equity instruments | – | – | | – | – | – | – | | – | – | – | – | | – | – | 0.05 | |
| 24 | Households | 93.10 | 19.76 | – | 19.76 | – | – | – | – | – | – | 93.10 | 19.76 | – | 19.76 | – | 88.08 | |
| 25 | of which loans collateralised by residential immovable property | 93.10 | 19.76 | – | 19.76 | – | – | – | – | – | – | 93.10 | 19.76 | – | 19.76 | – | 88.08 | |
| 26 | of which building renovation loans | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 27 | of which motor vehicle loans | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 28 | Local governments financing | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | 2.88 | |
| 29 | Housing financing | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 30 | Other local government financing | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 31 | Collateral obtained by taking possession: residential and commercial immovable properties | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | – | |
| 49 | Total GAR assets | 85.33 | 17.59 | – | 17.59 | – | – | – | – | – | – | 85.33 | 17.59 | – | 17.59 | – | 100 | |

4. GAR KPI flow (Turnover)

| % (compared to flow of total eligible assets) | | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o | p |
|---|---|--|--------------------------|---------------------|-------------------|--------------------------|--|-------------------|---|---|---|--|-------|---|-------|---|--|
| | | 31 December 2024 | | | | | | | | | | | | | | | |
| | | Climate Change Mitigation (CCM) | | | | | Climate Change Adaptation (CCA) | | | | | TOTAL (CCM + CCA) | | | | | Proportion of total new assets covered |
| | | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) | | | | | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) | | | | | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) | | | | | |
| | | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned) | | | | | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned) | | | | | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned) | | | | | |
| Of which Use of Proceeds | Of which transitional | Of which enabling | Of which Use of Proceeds | Of which adaptation | Of which enabling | Of which Use of Proceeds | Of which transitional | Of which enabling | | | | | | | | | |
| 1 | GAR - Covered assets in both numerator and denominator | | | | | | | | | | | | | | | | |
| 1 | Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation | 89.09 | 18.22 | - | 18.22 | - | - | - | - | - | - | 89.09 | 18.22 | - | 18.22 | - | 99.02 |
| 2 | Financial undertakings | 100.00 | - | - | - | - | - | - | - | - | - | 100.00 | - | - | - | - | 5.69 |
| 3 | Credit institutions | 100.00 | - | - | - | - | - | - | - | - | - | 100.00 | - | - | - | - | 5.69 |
| 4 | Loans and advances | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 5 | Debt securities, including UoP | 100.00 | - | - | - | - | - | - | - | - | - | 100.00 | - | - | - | - | 5.69 |
| 6 | Equity instruments | - | - | | - | - | - | | - | - | - | - | - | | - | - | - |
| 7 | Other financial corporations | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 8 | of which investment firms | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 9 | Loans and advances | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 10 | Debt securities, including UoP | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 11 | Equity instruments | - | - | | - | - | - | | - | - | - | - | - | | - | - | - |
| 12 | of which management companies | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 13 | Loans and advances | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 14 | Debt securities, including UoP | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 15 | Equity instruments | - | - | | - | - | - | | - | - | - | - | - | | - | - | - |
| 16 | of which insurance undertakings | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 17 | Loans and advances | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 18 | Debt securities, including UoP | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 19 | Equity instruments | - | - | | - | - | - | | - | - | - | - | - | | - | - | - |
| 20 | Non-financial undertakings | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 21 | Loans and advances | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 22 | Debt securities, including UoP | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 23 | Equity instruments | - | - | | - | - | - | | - | - | - | - | - | | - | - | - |
| 24 | Households | 97.36 | 21.40 | - | 21.40 | - | - | - | - | - | - | 97.36 | 21.40 | - | 21.40 | - | 84.27 |
| 25 | of which loans collateralised by residential immovable property | 97.36 | 21.40 | - | 21.40 | - | - | - | - | - | - | 97.36 | 21.40 | - | 21.40 | - | 84.27 |
| 26 | of which building renovation loans | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 27 | of which motor vehicle loans | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 28 | Local governments financing | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 9.06 |
| 29 | Housing financing | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 30 | Other local government financing | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | 9.06 |
| 31 | Collateral obtained by taking possession: residential and commercial immovable properties | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 49 | Total GAR assets | 89.96 | 18.04 | - | 18.04 | - | - | - | - | - | - | - | 18.04 | - | 18.04 | - | 100 |

5. KPI off-balance sheet exposures (Turnover)

| | | a | b | c | d | e | f | g | h | i | j | k | l | m | n | o |
|---|------------------------------------|--|---|---|-----------------------|-------------------|--|---|---|---------------------|-------------------|--|---|---|-----------------------|-------------------|
| | | 31 December 2024 | | | | | | | | | | | | | | |
| | | Climate Change Mitigation (CCM) | | | | | Climate Change Adaptation (CCA) | | | | | TOTAL (CCM + CCA) | | | | |
| % (compared to total eligible off-balance sheet assets) | | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) | | | | | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) | | | | | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible) | | | | |
| | | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned) | | | | | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned) | | | | | Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned) | | | | |
| | | Of which Use of Proceeds | | | Of which transitional | Of which enabling | Of which Use of Proceeds | | | Of which adaptation | Of which enabling | Of which Use of Proceeds | | | Of which transitional | Of which enabling |
| | | | | | | | | | | | | | | | | |
| 1 | Financial guarantees (FinGuar KPI) | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |
| 2 | Assets under management (AuM KPI) | - | - | - | - | - | - | - | - | - | - | - | - | - | - | - |

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