Eika Boligkreditt AS's statement on due diligence pursuant to the Norwegian Transparency Act (*Åpenhetsloven*)

for 1 January–31 December 2025

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

1.1 Organisation

Eika Boligkreditt is a credit institution which, at 31 December 2025, was owned by 50 banks. Its main purpose is to ensure that the local banks in the Eika Alliance have access to long-term competitive funding by issuing covered bonds in the Norwegian and international financial markets.

Eika Boligkreditt is part of the Eika Alliance, which comprises 41 independent banks, the Eika Gruppen AS financial group and Eika Boligkreditt. Eika Alliance 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 2025, the banks had transferred a total of NOK 114.4 billion in residential mortgages to Eika Boligkreditt, thereby easing the banks' own financing requirements by an equivalent amount.

Eika Boligkreditt had 21 permanent full-time employees at 31 December 2025. In addition, the company has entered into an agreement with Eika Gruppen AS concerning the purchase of services in a number of areas.

1.2 Products and services

The company's main purpose is to ensure that its owner banks have access to long-term 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, 60 per cent for joint debt in housing cooperatives and 50 per cent for holiday homes . 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.

1.3 The company's markets

Eika Boligkreditt is licensed to operate as a mortgage lender pursuant to the Norwegian Financial Institutions Act, and is subject to monitoring by the Financial Supervisory Authority of Norway. The company finances its owner banks by issuing covered bonds. Covered bonds are issued under a debt issuance programme and have been accorded a Aaa rating by Moody's. 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. Eika Boligkreditt ensures that the local banks have access to financing on roughly the same terms as the largest 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. Eika Boligkreditt grants mortgages solely to customers resident in Norway, for residential properties located exclusively in Norway.

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

Eika Boligkreditt is subject to the provisions of the Norwegian Transparency Act relating to human rights and decent working conditions. The company's board of directors, as its highest governing body, is responsible for ensuring compliance with the Transparency Act's provisions. The company may impact human rights and decent working conditions in its own operations as well as in relation to suppliers and business partners.

Eika Boligkreditt is working actively to ensure it has a responsible value chain. The company abides by its own *Guidelines for procurement processes, contracting and order placement* as well as *Guidelines for contract follow-up, revision and termination*. These newly established guidelines were implemented in 2025 following a major effort on the part of the company with respect to third-party risk management. The company has also updated the process/methodology it applies to due diligence under the Transparency Act. This shows how Eika Boligkreditt is working continuously to ensure responsible business conduct in its value chain through the follow-up of procurement processes and contracts.

Eika Boligkreditt operates in accordance with several internal guidelines that safeguard important environmental, social and governance (ESG) considerations. These include the company's *Whistleblowing Policy*, which has been adopted to ensure transparency and good communication within the organisation, thereby also promoting a positive 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 procedures, which comply with the requirements of Norway's Working Environment Act and Transparency Act, 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. The principles underpinning this vision are set out in the company's *Guidelines for procurement processes, contracting and order placement*.

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 its 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. The need for due diligence is widely endorsed within the company, with assessments being performed at least annually. All managers provide annual confirmation that the requirements of the Transparency Act have been met in their area of activity.

Eika Boligkreditt makes use of the high-risk list prepared by the Norwegian Agency for Public and Financial Management (DFØ) and available at www.anskaffelser.no to identify product categories associated with a high risk of human rights violations in the supply chain.

In addition, the company takes note of the companies excluded or placed under observation by Norges Bank Investment Management (NBIM), which administers the Norwegian sovereign wealth fund (GPFG), and Eika Kapitalforvaltning. This means excluding companies that violate international norms and principles that define minimum requirements for responsible behaviour in the areas of human and labour rights, the environment and anti-corruption. Eika Boligkreditt expects its suppliers to comply with national and international legislation and regulations, as well as internationally recognised principles and guidelines. If necessary, Eika Boligkreditt will ask suppliers to document their compliance. In the event of any serious violation, the company will consider cancelling its contract with the supplier concerned.

Information relating to the Norwegian Transparency Act may be found on the company's website at: https://www.eikbol.no/sustainability/transparency.

Eika Gruppen AS undertakes major procurements on behalf of Eika Boligkreditt and its owner banks. These procurements are undertaken in accordance with established procedures and governing documents, whose purpose is to ensure compliance with relevant laws and internal governance, monitoring and compliance requirements. Eika Gruppen performs due diligence on suppliers in connection with these procurement processes. With respect to ESG-related due diligence, Eika Gruppen takes a risk-based approach to identifying and managing the risk of non-compliance with fundamental human rights and a lack of decent working conditions in the supply chain and at business partners. Predefined risk elements form the starting point for these assessments.

According to the Transparency Act's preparatory works, enterprises may be permitted to collaborate on the performance of due diligence assessments. (Proposal to the Norwegian Parliament (Storting) Prop 150 L 2020-2021, section 8.2.3.3. page 67). In Eika Boligkreditt's considered opinion, Eika Gruppen's due diligence assessments are of high quality and its guidelines for the performance of such assessments are satisfactory. For more information on Eika Gruppen's due diligence process, please see the description provided here: https://www.eika.no/eika-alliansen/eikagruppen/apenhet (In Norwegian only).

1.5 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 homepage www.eikbol.no, and at https://www.eikbol.no/about-us/contact-us.

2. Negative consequences and risk

2.1 Introduction

The risks and impacts identified as relating to our own operations and the supply chain are described in separate sections, i.e. 2.2 *Own operations* 2.3 *Business partners and supply chain*

Eika Boligkreditt considers that the risk of non-compliance with fundamental human rights and decent working conditions is located mainly in its supply chain and business partners, rather than its own operations. This is because the company's own operations primarily comprise knowledge-intensive services in Norway, performed by employees covered by Norwegian employment legislation, collective agreements and established internal guidelines governing working conditions, ethical business conduct and whistleblowing. In addition, the company is licensed to operate as a mortgage lender, which means it is subject to strict requirements relating to anti-money laundering, sustainability reporting etc., as well as regulatory oversight by various authorities. This contributes to the company's low risk profile. The company has less direct control of working conditions and practices in its supply chain. Risk is, moreover, influenced by factors such as the type of procurement, the business sector with which the individual supplier is associated, its geographic area of operation and use of subcontractors, as well as the complexity of the value chain.

2.2 Own operations

The company is subject to Norwegian employment laws and has a duty to provide lawful employment terms and a fully compliant working environment, and to respect fundamental labour rights. Eika Boligkreditt fulfils its responsibilities as an employer in line with the Norwegian Working Environment Act (*Arbeidsmiljøloven*), Data Protection Act (*Personopplysningsloven*) and other relevant regulations, including those requiring systematic efforts in the area of occupational health, safety and environment (HSE).

Eika Boligkreditt is a member of the industry association Finance Norway. It is therefore covered by the prevailing Basic Agreement and other key agreements entered into between Finance Norway, the Confederation of Norwegian Enterprise

(NHO) and the Finance Sector Union of Norway. These agreements regulate key terms relating to pay and working conditions, co-determination and employer/employee collaboration, and create a framework for structured and consistent cooperation between employers, trade union representatives and employee safety delegates.

These statutory and voluntary obligations underpin the company's endeavours as an employer, and form the foundation for safeguarding our own workforce.

Eika Boligkreditt has performed an internal due diligence assessment. The methodology used in this assessment accords weight to risks that are of particular relevance to the financial sector in a Norwegian context, such as the working environment, gender equality and non-discrimination. The assessment showed that the company has a low internal risk of violating fundamental human rights and failing to provide decent working conditions. In addition, the company annually performs an anonymous employee survey that measures job satisfaction. The positive feedback which the company receives from its workforce through this survey indicates that it is fulfilling its obligations as an employer, also in the area of occupational HSE.

2.3 Business partners and supply chain

Eika Boligkreditt has itself negotiated and signed contracts with numerous suppliers and business partners. Eika Gruppen provides assistance with various major procurements that are negotiated on the company's behalf, as well as being a direct supplier.

2.3.1 Own business partners and supply chain

In 2025, 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 at business partners or in its supply chain.

The company's due diligence assessments show a consistently low risk for all the risk factors/areas for which business partners and the supply chain were evaluated. The majority of Eika Boligkreditt's suppliers and business partners operate within the EU/EEA area where strict and well-established requirements apply with respect to the environment and social rights. This helps bolster the company’s assessment that its supply chain has a low risk profile. The company's business partners are largely investment banks with offices in the EU/EEA area and the United Kingdom, which are subject to strict regulatory requirements and oversight in their capacity as financial institutions. This bolsters the company’s assessment that its business partners have a generally low risk profile. The level of detail that the company has found it appropriate to apply to its assessments reflects the fact that the company has identified nothing but low risk in its supply chain and at its business partners. This is in line with a risk-based and proportional approach to due diligence.

2.3.2 Business partners and supply chain through Eika Gruppen

In addition to the contracts with suppliers and business partners that the company has negotiated on its own account, Eika Gruppen AS is the process driver for various major procurements for members of the Eika Alliance and negotiates contracts on Eika Boligkreditt’s behalf. Eika Gruppen is also an important supplier of services to Eika Boligkreditt. Eika Boligkreditt accepts the due diligence performed by Eika Gruppen in relation to contracts negotiated by Eika Gruppen to which Eika Boligkreditt accedes, and to such services as are provided by Eika Gruppen itself. This reflects the fact that Eika Boligkreditt considers Eika Gruppen’s due diligence assessment process to be satisfactory (see section 1.4 above).

No actual abuses of human rights or decent working conditions have been identified in the due diligence assessments performed by Eika Gruppen in 2025. The processes established to deal with cases where negative impacts or material risks do exist have therefore not been utilised.

3. Remedial actions and potential risk

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.

4. Enquiries

Eika Boligkreditt has neither received nor replied to any enquiries in 2025.

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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 24 June 2026.

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This statement has been signed electronically.

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Board Chair

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Kristin Steenfeldt-Foss

Knut Marius Skoglund

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