

Statement on due diligence pursuant to the Norwegian Transparency Act

The Norwegian Transparency Act requires certain companies to report on their efforts to identify, prevent and mitigate the risk of adverse human rights impacts in their operations and value chains. Based on its size and revenue, Axactor ASA is subject to reporting pursuant to the Norwegian Transparency Act Section 5.

As disclosures required by the Norwegian Transparency Act are coinciding with other mandatory disclosure requirements to which Axactor is subject, this statement will refer to Axactor ASA's annual report 2025 where such information is available and relevant.

- A general description of Axactor ASA's organization and operations can be found on pages 4-11 and 35-50 of Axactor ASA's annual report 2025.
- Information on Axactor ASA's policies and routines for dealing with actual and potential negative consequences for human rights, as well as the results of its human rights due diligence assessment can be found on page 74-75 of Axactor ASA's annual report 2025.
- **Own workforce:** Axactor ASA places great importance on maintaining fair and favorable working conditions for its employees. The company ensures compliance with labor laws and regulations, including minimum wage requirements, working hours, rest periods, and other relevant provisions. Axactor fosters a positive work environment that respects employees' rights, encourages work-life balance, and provides opportunities for professional growth and development. Regular communication channels, grievance mechanisms, and performance evaluations are in place to address concerns, provide feedback, and improve working conditions within the company. Further information can be found in the Sustainability statement of Axactor ASA's annual report 2025.
- **Workers in the value chain:** Axactor ASA recognizes the significance of ensuring fair and ethical working conditions throughout its supply chain. The company collaborates with its vendors to promote adherence to international recognized labor standards and responsible business practices (including subcontractors). Further information can be found in the Sustainability statement of Axactor ASA's annual report 2025.
- **Consumers and end-users:** As part of its operations, the Axactor Group is in contact with millions of debtors each year. The fair and ethical treatment of consumers and end-users (debtors) are the core of Axactor ASA's operation. Further information can be found in the Sustainability statement of Axactor ASA's annual report 2025.
- **Affected communities:** Axactor ASA has not identified any at-risk communities, that would be impacted by its operations or services, given that it operates within the financial services sector and has little to no environmental or physical impact in its surrounding

communities. Further information can be found in the Sustainability statement of Axactor ASA's annual report 2025.

Through its human rights due diligence assessment, Axactor has not found evidence of any adverse human rights impacts caused or contributed to by Axactor. During the year, Axactor has continued to improve its human rights governance, by inter alia updating its Supplier Code of Conduct to align with developing expectations and through inclusion of human rights risks in the group wide risk management systems. This statement covers the period between 17 April 2024 and 6 May 2025.

Should you become aware of any matters which are relevant to Axactor's human rights due diligence assessment that are not covered in this assessment, including errors or omissions, you are invited to report such matters to transparency@axactor.com.

The Board of Directors of Axactor ASA declares that this statement satisfies Axactor ASA's information and reporting obligations pursuant to Section 5 of the Norwegian Transparency Act.

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Signatures from directors of the board of Axactor ASA

Oslo, 6 May 2025

Verified by:

Terje Mjøs
Chair of the board

Verified by:

Kjersti Høklingen
Board member

Verified by:

Lars Erich Nilsen
Board member

Verified by:

Brita Eilertsen
Board member

Verified by:

Ørjan Svanevik
Board member