

Statement on due diligence pursuant to the Norwegian Transparency Act

The Norwegian Transparency Act requires certain companies to carry out due diligence assessments and to publish a statement concerning their work on fundamental rights and decent working conditions.

Axactor ASA is subject the Norwegian Transparency Act. This statement has been prepared pursuant to sections 4 and 5 of the Act.

As disclosures required by the Norwegian Transparency Act coincide 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 for 2025, Axactor has assessed actual and potential adverse impacts on fundamental human rights and decent working conditions in its own operations, supplier relationships and business activities.

Axactor has not identified material actual adverse human rights impacts caused or contributed to the company during the reporting period.

During the year, Axactor continued to strengthen its governance framework, including by updating its Supplier Code of Conduct and integrating relevant human rights risks in the group-wide risk management system. These measures are intended to improve risk identification, follow-up and mitigation.

This statement covers the period from 1 January 2025 to 31 December 2025. Where relevant, it also refers to material developments and measures adopted after 31 December 2025 and up to the date of signature.

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 the CEO and Board of Directors of Axactor ASA

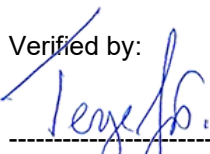
Oslo, 9 April 2026

Verified by:



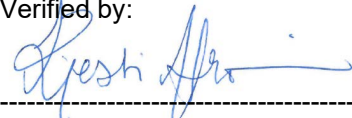
Johnny Tsolis
Chief Executive Officer

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