2025

Report on the activity duty and duty to issue a statement

DNB Group

The scope of the report

Section 26 of the Norwegian Equality and Anti-Discrimination Act requires DNB to report on its work to promote equality and prevent discrimination. This report describes the actual status of gender equality, diversity and inclusion in DNB in 2025, and how we have been working to fulfil our activity duty under the law throughout the year. As a large group with several legal entities, we have a strong focus on equality, diversity and inclusion. Our ambition is to be a driving force for diversity and inclusion. This report covers DNB Bank ASA and associated wholly owned subsidiaries in Norway with over 50 employees. Subsidiaries that are held for sale and companies that produce their own report are not covered, unless otherwise specified. People is the Group's centralised HR function (HR/People) with responsibility for the HR processes. All legal entities in DNB Bank ASA are required to follow the governing documents and comply with the same HR processes.

Part 1: Statement regarding gender equality in DNB

1.1 Gender balance at management level

The ambition of having a good gender balance (40/60) at management levels 1–4 stands firm, and in 2025 we achieved this goal at management levels 1–2. The figure is calculated based on all of the employees in the Group, not just the Norwegian part of the operations.

At the end of 2025, the average proportion of women at management levels 1–4 was 37.5 per cent, compared with 36.5 per cent in 2024. There are relatively few managers at these levels, which means that small changes can have a large impact. The proportion of women on the Board of Directors and in the Group Management team was 60 per cent and 42 per cent, respectively. We will maintain a focus on the proportion of women at management levels in the time ahead.

Gender balance per management level in per cent:

Management level	Women	Men
Levels 1–2	43	57
Level 3	39	61
Level 4	37	63

1.2 Gender balance, temporary employees, leaves of absence and part-time work

DNB Bank ASA

Gender balance		Temporary employees		Parental leave		Part-time		Involuntary part-time	
Number of women and men		Number of temporary workers		Average number of weeks of leave		Number of temporary workers		Number of involuntary part-time workers	
Women	Men	Women	Men	Women	Men	Women	Men	Women	Men
3 435	4 360	7	13	21.8	12.4	112	121	5	17

DNB Eiendom AS

Gender balance		Temporary employees		Parental leave		Part-time		Involuntary part-time	
Number of women and men		Number of temporary workers		Average number of weeks of leave		Number of temporary workers		Number of involuntary part-time workers	
Women	Men	Women	Men	Women	Men	Women	Men	Women	Men
387	483	0	0	18.9	6.6	74	91	10	14

DNB Livsforsikring AS

Gender balance		Temporary employees		Parental leave		Part-time		Involuntary part-time	
Number of women and men		Number of temporary workers		Average number of weeks of leave		Number of temporary workers		Number of involuntary part-time workers	
Women	Men	Women	Men	Women	Men	Women	Men	Women	Men
172	123	0	0	21.1	12.1	8	2	2	0

DNB Asset Management AS

Gender balance		Temporary employees		Parental leave		Part-time		Involuntary part-time	
Number of women and men		Number of temporary workers		Average number of weeks of leave		Number of temporary workers		Number of involuntary part-time workers	
Women	Men	Women	Men	Women	Men	Women	Men	Women	Men
41	101	0	0	16.5	10.3	0	0	0	0

DNB Næringseiendom AS

Gender balance		Temporary employees		Parental leave		Part-time		Involuntary part-time	
Number of women and men		Number of temporary workers		Average number of weeks of leave		Number of temporary workers		Number of involuntary part-time workers	
Women	Men	Women	Men	Women	Men	Women	Men	Women	Men
28	29	0	1	0	0	0	1	0	0

Gender balance

The tables show the gender balance in the various legal entities in the DNB Group. In total, more men than women work in the Group.

Temporary employees

DNB has few temporary employees. Somewhat fewer women than men are temporary employees. There was an increase in the number of temporary employees among men from 2024 to 2025, and a decrease in the number of women.

Parental leave

The tables provide an overview of how many weeks women and men on average took parental leave in 2025. On average, women take more weeks of parental leave than men.

Part-time employees

Part-time employees are men and women who do not work full time. Overall, the Group had fewer part-time employees in 2025 compared with 2024. Most part-time employees work in real estate and in our customer service centres.

Involuntary part-time

Through mapping of involuntary part-time work in 2025, it emerged that some of our part-time employees would like a larger full-time equivalent (FTE) fraction, and are available to work more. For people who want to expand their FTE fraction, this will be considered on a case-by-case basis, in accordance with Section 14-3 of the Norwegian Working Environment Act.

1.3 Salary data

DNB first published an equal pay report showing differences in levels of pay between women and men in positions with the same levels of responsibility and complexity in 2021 and 2023. DNB is required to publish this report every two years and the results for 2025 are given below.

The analysis covers the Group's employees in Norway and is based on a division into six categories of positions according to responsibility and complexity, where level 1 is the lowest level. The table shows the gender balance and the pay gap in each category.

	DNB Group, excluding employees in securities and portfolio management			Employees in securities and portfolio management		
Position category	Proportion of women (%)	Women's fixed salary as a proportion of men's (%)	Women's total salary as a proportion of men's (%)	Proportion of women (%)	Women's fixed salary as a proportion of men's (%)	Women's total salary as a proportion of men's (%)
1	58	104	101	-	-	-
2	55	108	95	-	-	-
3	43	94	91	31	99	77
4	38	93	92	13	76	58
5	34	95	93	12	89	58
6	40	94	95	27	88	69

The results for 2025 show that the gender pay gap varies by position category. This emphasises the importance of analysing pay within comparable categories. DNB is monitoring developments over time and uses the analyses as grounds for further work with equal pay and fair wage formation.

When the differences in pay are calculated without taking into consideration roles and responsibilities, women's fixed salary as a proportion of men's is 89 per cent. This means that the pay gap has been reduced by 1 percentage point compared with 2023. Women's total salary as a proportion of men's was 86 per cent (87 per cent in 2023). Women account for 44 per cent of employees in Norway.

The figures for employees in securities and portfolio management have been placed in a separate table, as these areas have a different market practice for wage formation. When the differences in pay for this group are calculated without taking into consideration the job content, women's fixed salary as a proportion of men's was 78 per cent, while women's total salary as a proportion of men's was 58 per cent. Women comprise 18 per cent of the employees in this job category.

In 2026, we will continue to work to identify pay gaps that can be attributed to gender, with a view to working systematically to further close the gender pay gap.

Part 2: Statement regarding the work on equality, diversity and inclusion in DNB

2.1 Principles, procedures and standards relating to equality and anti-discrimination

DNB's corporate governance includes provisions that regulate equality, anti-discrimination, diversity and inclusion. DNB's governance principles, which constitute the general framework for all governance of the Group's operations, state that DNB will be a driving force for diversity and inclusion through targeted and planned work in this area, and will promote equality among all employees and prevent discrimination.

DNB's Code of Conduct is the Group's main ethical framework and sets out expectations, commitments and requirements with regard to how we should act. DNB's Code of Conduct reflects our values, forms the basis for our culture and is at the top level of DNB's governing document hierarchy.

It follows from the Code of Conduct that DNB does not accept any form of discrimination, whether this is on the basis of factors such as gender, age, ethnicity, religion or belief, disability, sexual orientation or political beliefs. Moreover, DNB does not accept any form of harassment, including unwanted sexual attention. This applies in relation to customers, suppliers, colleagues and others. Everyone must be treated with respect in DNB.

We have clear requirements for how we should treat each other in DNB, and aim to have a working environment where it is considered positive to speak up about circumstances that are not acceptable. Employees must not express opinions, make jokes or write messages that are offensive, derogatory or inappropriate. In DNB, no form of harassment, bullying or other improper conduct at the workplace is tolerated.

All employees, hired temporary employees and consultants are encouraged to report unacceptable circumstances. They can notify their immediate superior, their manager, the relevant specialist unit or HR/People. If this is unsuccessful, notification can be made via DNB's digital notification channel (whistleblowing). All unacceptable circumstances can be reported via this channel[1].

As part of the annual cycle for corporate governance, DNB carries out a programme of different measures to guarantee learning, implementation and compliance with the Code of Conduct and other governing documents relating to ethics, behaviour and culture.

2.2 Goals and ambitions

To simplify everyday life and improve the finances of people and businesses, it is crucial that we reflect the diversity in our society, understand our customers' needs, have access to the best competence, and develop and apply our diversity competence.

In line with DNB's sustainability ambitions, we aim to be an advocate for diversity and inclusion. This means that we must be proactive and set the direction in this area. We have taken a long-term and strategic approach to achieve

1 To read more about how DNB works with equality and discrimination, see our annual report for 2025 and the sub-chapter ESRS S1 Own workforce on dnb.no/sustainability-reports.

our ambition of at least 40 per cent women at management levels 1–4. Going forward, we will continue to work to increase the proportion of managers and executives with a multicultural background.

To measure progress and target attainment in relation to the Group's overarching strategy, a set of strategic key performance indicators has been established. The results are reported to the Group Management team on a quarterly basis and to the Board of Directors of DNB twice a year. Goals and ambitions relating to diversity and inclusion are part of the reporting.

DNB has strong credibility in the area of gender equality. This has enabled us to take a clear position in the social debate, as well as commercially in recent years, through the #huninvesterer (#girlsinvest) campaign. We are working systematically with financial gender equality, and are taking responsibility for promoting financial literacy in the population. Our reason for doing this is that knowledge is crucial to making good financial decisions.

2.3 Plan for diversity and inclusion

As part of the efforts relating to equality and anti-discrimination, in the first quarter of 2022 we prepared a new plan for diversity and inclusion. This was updated in January 2025 with the plan for diversity and inclusion for 2025–2027, as part of a broad dialogue with the management, the employee representatives and our diversity networks.

Our Group strategy and external requirements provide guidance for our priorities. In the new plan, we are keeping gender equality and multicultural diversity as priority areas.

Diversity

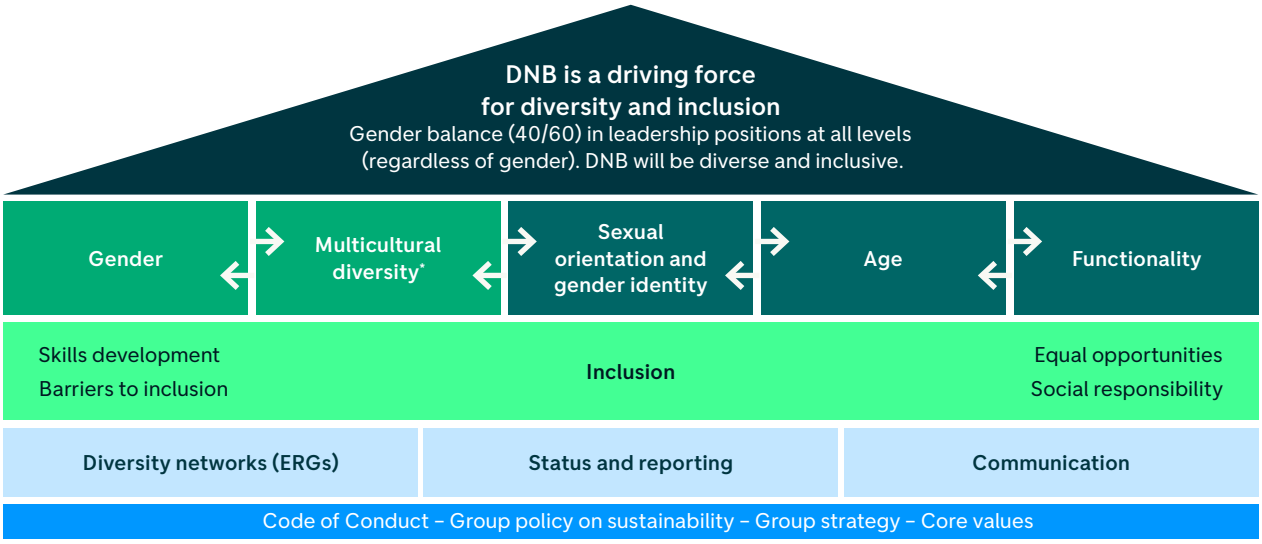
In DNB, we define diversity in broad terms. Diversity is about what makes us all different – and includes both visible differences, such as age, gender and ethnicity, and less visible differences, such as competence, culture and sexual orientation. When combined with an inclusive culture where employees experience psychological safety and can be themselves, diversity creates value. This requires managers who are skilled at managing and developing diverse teams.

In our prioritisation of diversity areas (grounds for discrimination), we take our starting point in the legislation and the activity duty and the duty to issue a statement. Working strategically also means setting clear priorities based on capacity and the organisation's ability to build competence over time.

We have considered our priority areas from a societal, customer-related and organisational perspective. Based on this, we are keeping gender equality and multicultural diversity as main areas in the period 2025–2027.

In addition, we are continuing our work relating to sexual orientation, gender identity and expression, age and functional ability. We have reached different maturity levels

Plan for diversity and inclusion 2025–2027



in these areas, and our internal networks and collaboration with external parties are therefore key.

In all work to enhance diversity, the qualification principle stands firm: employees must have the competence that is required for the role. At the same time, we must actively develop and promote minorities and underrepresented talents so that diversity will be reflected at all levels of the organisation in the long term.

Inclusion

When combined with an inclusive culture, diversity builds value. When diverse perspectives are valued and the employees feel that it is safe to be themselves at work, we are able to unlock the full potential of diversity.

Inclusion is about measures and practices that give everyone the same opportunities to contribute, regardless of their background. That means building working environments in which employees feel welcome, respected and valued.

This requires managers who can foster psychological safety and lead diverse teams. DNB has therefore developed a six-hour course in inclusive management that concentrates on the manager role in diversity work, identity and diversity competence, privileges, barriers, psychological safety and inclusive leadership in practice. The course is also offered digitally in both Norwegian and English.

In 2025 we had a special focus on barriers to career development for employees with multicultural backgrounds and explored the scope of action afforded by the law in relation to working with multicultural diversity on the basis of insights. Going forward, this work will be continued and strengthened.

Diversity networks

In order to realise DNB's diversity and inclusion goals, it is important to mobilise the organisation and engage the employees through our Employee Resource Groups (ERGs).

DNB has also established networks for equality, multicultural diversity, gender and sexual diversity (LGBT+), young employees (Young Professionals) and our internal ODA network for women in technology. These networks are run by engaged employees, with backing from HR/People, and promote greater awareness, visibility and understanding of different diversity areas.

The networks organise internal and external events, network-building with decision-makers and promote role models throughout the organisation – also internationally.

In order to ensure coordination, support and an inter-disciplinary approach, we gather the network leaders in joint meetings.

2.4 Activity by diversity area/grounds for discrimination

Gender

Our targeted work on equality is delivering results. At the end of 2025, the proportion of women at management levels 1–4 was 37.5 per cent, an increase of 1 percentage point from the year before. Work remains to be done with a view to achieving the target of 40 per cent women at these management levels.

In order to strengthen this development, in 2025 we decided to implement several targeted measures.

- **Strengthen leadership skills and data-driven insights**
  We have raised awareness among managers about the factors that influence the gender balance and clarified the need to think in actual numbers, not only in per cent. This makes it easier to monitor developments and identify the gap between DNB and the 40 per cent target.
- **Analysing and improving internal processes**
  We have completed a thorough review of the gender balance in four prioritised units. The results will be used to assess the need for supplementary measures. Among other things, we see the need to strengthen talent development processes and have started the work of preparing a *playbook* for inclusive recruitment.
- **Better support during the baby and toddler stage**
  For parents, the baby and toddler stage is a delicate phase of life which can affect women differently from men. The highest levels of absence due to illness in Norway are found among women aged 30–34 and 35–39 (sickness absence certified by a doctor for women in 2024, Norwegian Labour and Welfare Administration, Nav). In order to reduce the risk of absence due to illness and contribute to retaining women with leadership talent, we have prepared a proposal for improved follow-up of parents before, during and after parental leave. We have already started to update our procedures, have developed a DNB Baby concept, and have planned the first Parent Club meeting.

On International Women's Day, we held an event where we highlighted topics such as the gender balance in technology,

women's health and menopause, as well as being a working parent of young children. The event was held both physically and digitally, in Norwegian and English.

In the autumn of 2025 we held 27 #huninvesterer (#girlsinvest) events across the entire country. The topic was 'saving in turbulent markets'. Corporate customers were also invited to organise internal #huninvesterer events for their workplaces.

In 2025, we received international recognition through rankings and nominations for recognised lists and prizes:

- Forbes ranked DNB as one of the world's most attractive employers in the world;
- for the very first time, DNB made it onto Forbes' list of the World's Top Companies for Women 2025;
- DNB was a finalist in the European Diversity Awards in the category *Company of the Year*.

DNB in Riga also won several awards in 2025 for its diversity and inclusion work:

- third place in the *Fair Pay* prize awarded to large companies in 2025, for the office's work on a fair and transparent pay policy;
- bronze status in the initiative *Dazadiba ir speks (Diversity is strength*, a Latvian initiative to promote diversity and inclusion in working life);
- certified as a *Family Friendly Workplace* by the Latvian governmental foundation for integration (SIF) due to the bank's family-friendly and inclusive work culture.

In a time when efforts to promote equality, diversity and inclusion are under pressure, it is important that Norwegian businesses stand up for fundamental values. The Norwegian Equality and Anti-Discrimination Ombud (LDO) invited several large organisations – including DNB – to a joint meeting to reaffirm their commitment to diversity and inclusion.

Multicultural diversity

In accordance with our plan for diversity and inclusion, we have made multicultural diversity a priority area, in addition to gender. Our focus on multicultural diversity is twofold and addresses both competence and career opportunities:

- **Multicultural competence:**
  Understanding multicultural diversity, which encompasses the spectrum of different cultures, ethnicities, languages, religions and traditions that coexist within or across societies.
  The ability to navigate effectively between different cultures in a multicultural society.
  The competence to understand and engage with one another and our customers in an inclusive manner.
- **Career opportunities**:
  Ensuring that employees with a multicultural background feel that they have equal career opportunities.
  Visible representation of managers with a multicultural background.

We have an active multicultural network run by engaged employees who want to make a genuine difference. The network organises activities that raise awareness and competence on multicultural diversity and showcase role models with multicultural backgrounds, and it identifies measures that can contribute to greater representation across all levels of the organisation. The network kicked off 2025 with the breakfast seminar 'Multicultural diversity in DNB: Representation matters', where we addressed inclusion, career opportunities and the lack of representation of managers with a multicultural background. We also celebrated Eid and Diwali at several of our offices, and organised workshops on unconscious bias and Open Hour gatherings for employees with a multicultural background.

In addition, we continued our targeted and long-term work to increase the proportion of managers with a multicultural background. This means identifying, developing and retaining talents over time – which is systematic and long-term work.

In 2025, we launched the second round of our six-month reverse mentoring programme for multicultural diversity, where 17 employees with a multicultural background served as mentors for 17 of DNB's managers. The objective of the programme is to strengthen managers' awareness of and competence on multicultural diversity, both in DNB and in society in general. At the same time, the programme highlights skilled talents and builds relationships across the organisation. The programme will conclude in April 2026.

We also focus on multicultural diversity in our talent processes. Talents with a multicultural background must be identified in both talent reviews and in succession planning. In addition, we have targets for the proportion of talents with a multicultural background in our talent programme, Aspire. In 2025, 21 per cent of the participants in this programme had a multicultural background.

We also established a dialogue with the LDO to explore the scope for action in the legislation relating to mapping the proportion of managers who have a multicultural

background. The goal is for DNB's work to be more knowledge-based, and for the work to be more accurately targeted.

Multicultural diversity will be kept as a priority area in 2026.

Sexual orientation and gender identity

We have a well-established LGBT+ network in DNB, which is the driving force behind the Group's work relating to sexual orientation and gender identity. The network works to engage and inspire our employees at every level and at all DNB locations in the efforts relating to sexual orientation and gender identity at the workplace, to identify measures that contribute to inclusion of sexual orientation, gender identity and expression at all levels of the organisation, and to organise events with relevant topics to increase awareness of sexual orientation, gender identity and expression.

2025 was another year in which we focused on 'Pride all year'. We finalised an internal information leaflet about transgender people, organised talks on 'hu skeive & han muslimen' (that queer woman and that Muslim guy), and about finding out that you are transgender. We took part, both on stage and in the audience, at Oslo Pride Business Forum. We held a large Pride breakfast with artists and entertainment for about 600 guests (internal and external), before rounding off with the Pride parade, where about 500 people walked together with DNB.

In October, the network held a gathering for 90 attendees from external LGBT+ networks. The topic was 'Safe places – more than just spaces', with talks about the personal repercussions of the terrorist attack against Pride in 2022, and about how DNB Riga works to ensure that the workplace is a safe space.

DNB was the main partner for Pride events in Oslo and Bergen, and for Baltic Pride.

Age

It is important to DNB that we enable older employees to work for longer, so that we can retain their competence and experience, not least in light of the current labour market. Raising the age of retirement is also a corporate responsibility.

The Group's employee survey (PULS) shows that the oldest age groups score highest on engagement.

DNB has a life phase-oriented personnel policy, where we view the whole person throughout their working life, rather than having specific policies for specific groups. We believe that the most important thing is to be present at work, and to have opportunities for skills enhancement and development at the workplace. There are a few special schemes for older workers in DNB. DNB offers an extra five days off from the year in which an employee turns 62, until they leave DNB. This is in addition to the statutory five extra days of holiday in the Norwegian Holidays Act for employees who have turned 60. Employees in a full-time position also have the right to reduce their daily working hours by one hour from the age of 64, in accordance with the General Agreement for the Norwegian financial sector. Employees also receive an automatic 1.7 per cent supplement to their fixed salary in the month in which they turn 63 and 64, respectively.

We believe that enabling skills enhancement and ongoing follow-up is important. We have a large in-house labour market in DNB. The competence DNB's older workers possess is highlighted in many appointment recommendations. Employee representatives are involved in all hiring processes and can give input to managers regarding candidates.

Disability

DNB follows up the goals in the Norwegian inclusive workplace agreement, and has an ambition to be an inclusive workplace that promotes health. We are carrying out measures to reduce sick leave and stop people from leaving working life. Action is being taken to ensure that employees with permanent disabilities are able to use their capacity for work and continue working.

We comply with all external statutory requirements and take these into account when building new premises. The necessary adaptations are made if employees who need adaptation are hired.

We have an agreement with the VI Foundation , which works to provide people with reduced functional ability equal opportunities to a full life. The foundation aims to help more people with disabilities experience a higher quality of life, improved health, increased confidence and more social contact.

In 2025, an attempt was made to establish a dedicated network for functional diversity. We see that we need support from allies (e.g. colleagues, family and friends) to advance this agenda. We will continue this work in 2026.

2.5 Identification of risk of discrimination and obstacles to equality

Equality and anti-discrimination efforts

In DNB, both the management and the employee representatives focus on the work to promote diversity and reduce the risk of discrimination and obstacles to equality. Questions relating to equality and discrimination have been discussed in the organisation and with employee representatives in different contexts for many years. The matter is brought up, for example, when following up the strategy work relating to diversity and inclusion, as well as projects relating to compliance and follow-up of statutory requirements. This can happen in formal meeting arenas, e.g. joint consultation committees and working environment committees, and in informal contact meetings. Equality and discrimination issues can also be brought up in work processes for following up and complying with statutory requirements and internal requirements, such as risk assessments of HR processes.

We have two different mapping tools for identifying discrimination and obstacles to equality:

- employee surveys
- risk assessments

Employee surveys

Our employee surveys are an important tool in the work to identify risk of discrimination and obstacles to gender equality. In total, there are three surveys per year. Inclusion and perceived equal treatment are mapped during the year. The results of the surveys provide input for targets, measures, and the plan for inclusion and equality efforts.

The collaboration with the employee representatives and the safety representative function is very important in order to illuminate issues and challenges relating to the working environment, absence due to illness, and equality. The previous employee survey was carried out in December 2025.

At the overarching level, most of our employees consider DNB to be an equal and inclusive workplace. In the following, we will provide some examples of results that show how employees view the general situation relating to equality, diversity and inclusion in DNB. The figures were relatively stable from 2024 to 2025.

Being yourself at work

When employees were asked whether they felt respected and valued for who they are, 87 per cent responded positively, 8 per cent gave a neutral response and 5 per cent responded negatively or 'don't know'.

Expressing own opinions

When employees were asked whether they felt it was safe to express their opinions, despite potential disagreements, without fearing the consequences, 85 per cent responded positively, 9 per cent gave a neutral response and 6 per cent responded negatively or 'don't know'.

Inclusion in own unit

When employees were asked whether they felt included in their own unit, 86 per cent responded positively, 8 per cent gave a neutral response and 5 per cent responded negatively or 'don't know'.

A driving force for equality and diversity

When employees were asked whether they felt that DNB is a driving force for equality and diversity in society, 80 per cent responded positively, 11 per cent gave a neutral response and 7 per cent responded negatively.

Discrimination at work

When employees were asked whether they had experienced discrimination at work during the past 12 months, 3 per cent responded that they had. In addition, 3 per cent ticked the box for not wanting to answer.

Risk assessments of HR processes

It is important in our diversity and inclusion work to ensure that we have good HR processes that promote equal opportunities and prevent discrimination. Systematic risk assessments of HR processes allow the identification of risk of discrimination and obstacles to equality, and measures to reduce risk are implemented.

We have corporate governance documents and processes that are based on a risk-based approach and risk-mitigating process steps. The residual risk is associated with compliance in the line organisation. The main measures for mitigating risk relate to ensuring better compliance in the line organisation by increasing understanding of own attitudes and unconscious bias, as well as working with competence building.

DNB's Group function HR/People enables the Group to comply with protection against discrimination. HR/People also manages the Group's employer responsibilities at

a central level. In 2025, we conducted systematic risk assessments of key HR processes. Employee representatives from all wholly owned subsidiaries were involved in this work. The risk assessments are described below.

Recruitment

The recruitment process is central to our efforts to achieve a diverse workforce. To increase diversity in DNB, including the proportion of women managers and managers with a multicultural background, we must seek to ensure that the hiring process reduces the risk of unconscious discrimination.

To promote equality, diversity and inclusion in our recruitment process, we take the following steps:

- We have prepared a separate diversity statement that we use in all of our external job advertisements.
- We work on an ongoing basis to ensure that the language in our advertisements is gender neutral.
- We publish advertisements in English when Norwegian language skills are not required.
- We are aware that our use of images must reflect diversity in society, while at the same time being genuine, and not artificial.
- We use different channels to ensure that we reach relevant target groups.
- We have standardised interview guides to reduce the risk of unconscious bias in the assessment process.
- We require gender balance in the recruitment and employment agencies we use.
- We require written assessments of the best qualified woman and man when making appointments at levels 3 and 4.

Our risk assessment of the recruitment process has revealed inherent risk associated with attitudes and competence, as well as residual risk associated with processes. The option to apply the four-eyes principle has been established for process steps in the recruitment process that were previously left to individual assessments.

To ensure equal opportunities, we will also develop a guide to inclusive recruitment for everyone involved in recruitment. This will contribute to increasing awareness of the importance of creating an inclusive interview situation and of unconscious bias in relation to different grounds for discrimination, how to ask questions, etc.

Salary and working conditions

DNB has established and documented salary processes. Determination of salary must be neutral and based on objective criteria. There are different processes for different salary elements, which are risk assessed individually.

DNB offers competitive, but not market-leading, remuneration that ensures that employees are valued and remunerated based on a comprehensive assessment of responsibilities, conduct and performance relating to financial targets and non-financial goals, as well as compliance with internal and external framework conditions.

DNB's salary system aims to be comprehensive, flexible, predictable and adapted to DNB's needs. It should contribute to recruiting and retaining qualified employees, so that DNB achieves its strategic goals. During recruitment, employees' fixed salaries are determined based on e.g. the responsibility and complexity associated with the position in question and an understanding of salary levels and market rates. All external recruitment is handled by our recruiters in collaboration with the recruiting manager, and local employee representatives are involved in the process.

DNB is bound by collective agreements that regulate the pay settlement for employees covered by the collective agreement. The employer and local representatives of the trade unions are committed to equal pay and agree that this should be reflected in the year's allocations. The guidelines for the pay settlement state that the pool for individual salary increases is to be distributed proportionately between women and men, and that the allocation must not reinforce unwanted pay gaps. Neutrality is safeguarded in the Group instructions for remuneration and no risk of discrimination has been identified in the established processes. However, an inherent risk of discrimination has been identified in relation to the determination of individual bonuses due to the exercise of discretion. DNB has established controls that entail that the residual risk is assessed as low.

Promotion and opportunities for development

The vast majority of employees believe that DNB is a workplace where everyone has equal opportunities. In 2025, 10 per cent disagreed with this statement, compared with 9 per cent in 2024.

The diversity area in which DNB has made the most progress is in the work with equality. To achieve the goal of gender balance at all management levels, we are working systematically and in a targeted manner to improve the gender balance in units in which the proportion of women

is less than 40 per cent. We have implemented several measures to ensure gender balance and access to enough women with leadership talent:

- a minimum proportion of 50 per cent women in in-house leadership development and talent programmes;
- a minimum of 40 per cent women candidates on succession planning lists;
- identification of the best qualified women and men in recruitment processes for management positions before a final candidate is chosen;
- diversity as one of the placement criteria during restructuring processes;
- a particular emphasis on improving the gender balance when changing the composition of management teams;
- gender balance is followed up as part of the scorecards in all units and is part of the reporting to DNB's Board.

DNB has a system for ongoing employee follow-up called 'Boost'. This is a Group-wide system that must be followed by all employees and is the same for everyone. The aim of Boost is to ensure systematic and continuous employee follow-up, and ambitions and development goals must be defined in Boost.

We have also established systems for employee development through schemes for educational leave, financial support for education at external educational institutions, and DNB's own development programmes through DNB University, the Group's internal learning and development platform. Some of these development initiatives are available to all, while some are based on selection and prioritisation. In principle, the development criteria are objective and neutral. An inherent risk of discrimination has been identified due to the exercise of discretion when assessing these criteria. However, DNB has established controls that entail that the residual risk is assessed as low.

Adapted work situation

DNB complies with its obligation to provide an adapted work situation for employees with reduced capacity for work, caregiving responsibilities and other situations that may require an adapted working day. No obstacles to equality or risk of discrimination have been identified due to a lack of adaptation or as a result of a need for special adaptations.

However, there is an inherent risk that the adaptations in themselves could be a risk driver for discrimination in other areas. We have not identified any risk of unwarranted differential treatment in other processes as a result of these measures.

Work–life balance

The 2025 employee survey showed that most DNB employees feel that they have a good work–life balance. Feeling that there is not enough time to deliver quality work can make employees feel uncomfortable and stressed. Managers must also try to reduce stress that causes employees to feel uncomfortable through targeted measures.

DNB has a series of policies to facilitate a good work–life balance:

- In DNB, we have a general flexitime arrangement that applies in principle to all employees covered by the Group Agreement. DNB has facilitated a flexible physical and digital working model, and in principle, employees have the opportunity to work outside the office two days a week.
- Employees who take parental leave for at least five months receive a salary increase of 1.7 per cent of their fixed salary when they return to work. These employees are also to be assessed in the ordinary way during the regular pay settlement.
- DNB has a gender-neutral scheme for parental leave for employees in Norway and abroad. Employees in Norway receive up to 20 weeks of paid leave in cases where they are not entitled to paid parental leave from Nav. This scheme also applies to employees at our international offices, also in countries where employees are not entitled to paid leave under national rules.
- DNB has summer hours, where employees with ordinary working hours from 08:00–16:00 receive a 30-minute reduction in working hours from 15 May to 31 August.
- DNB has health insurance for all permanent employees and for temporary employees that have been hired directly by DNB in a position with an FTE fraction of more than 20 per cent. This is contingent on the employees being members of the Norwegian National Insurance Scheme and having permanent residence in Norway.
- DNB has a holiday home scheme, and rents out cabins and holiday flats.

Our risk assessment of these processes has revealed that DNB offers all statutory measures, in addition to having processes and measures that exceed the minimum statutory requirements. As a result of DNB's efforts in this area, no risk of discrimination or barriers to equality have been identified at the system level. However, there is an inherent risk that the measures in themselves could be a risk driver of discrimination in other areas. We have nevertheless not identified any risk of unfair treatment in other processes as a result of these measures.

Harassment, sexual harassment, gender-based violence

DNB has zero tolerance of bullying and harassment. In response to the question 'Have you been subjected to bullying or harassment from a customer, manager or colleague over the past twelve months?', 3 per cent of employees answered 'yes'. Approximately 50 per cent of the cases had occurred in connection with customer contact.

The proportion of employees who experience harassment is relatively low in our industry, and DNB is in line with the industry average. We have zero tolerance of this type of behaviour and we work in a systematic and targeted way on prevention. Although the vast majority of employees respond in the negative or neutrally to such questions, it is necessary to continue mapping incidences of bullying and harassment, and thus also highlight the effect of preventive measures.

We have procedures in place for handling bullying, harassment and personnel conflicts. These are mainly based on solving cases at the lowest possible level and as quickly as possible. The procedures set out roles and responsibilities and opportunities for assistance. Unwanted behaviour is prevented through information, training and efforts relating to the working environment.

All employees, temporary employees and consultants in DNB are entitled to report unacceptable circumstances in accordance with the Norwegian Working Environment Act. The rules regarding notification were changed in January 2020, introducing a definition of unacceptable circumstances and a strengthening of the rights of whistleblowers, in addition to the employer's obligation to protect employees. The changes were included in DNB's procedures.

With effect from July 2021, the Norwegian Anti-Discrimination Tribunal has been able to make decisions in cases where employees have claimed that they have experienced reprisals. Group Audit manages the DNB Group's notification scheme, a confidential electronic channel that is designed to allow anonymous notification.

Summary of risk assessments for the year

We have not identified any risk of discrimination or barriers to equality at the system level in key HR processes for recruitment, work–life balance, special adaptation, pay and working conditions, or development opportunities.

We have, nonetheless, identified an inherent risk of discrimination in process steps that entail exercise of discretion in the line organisation. Common to these process steps is that we have established controls that reduce the residual risk, with the conclusion that the residual risk is low.

The above still underlines the importance of maintaining an ongoing focus on competence-building measures and training in objective discretion at the management level. This work will continue and be further developed in 2026.