

DNB

2025

Report under the Norwegian Transparency Act

Contents

Purpose and delimitations	3
About DNB	3
The scope of the report	3
Corporate governance	3
Support for accountability in DNB's policies and procedures	3
Due diligence	5
Mapping and assessment	6
Duty of confidentiality	6
Report on due diligence	7
Purchasing and procurement	7
Own employees	10
Lending to corporate customers	11
Facilitation activities relating to bond loans and share issues in DNB Carnegie	12
DNB Asset Management AS	13
DNB Livsforsikring AS	14
DNB Eiendom AS	15
DNB Boligkreditt AS	15
DNB Næringseiendom AS	16
DNB Næringsmegling AS	17
Remedy and damages	17
Communication and transparency	17
Notification channels and complaints mechanism	17

Purpose and delimitations

Basic human rights and decent working conditions are fundamental to all of DNB's business operations, as an employer, a supplier of financial services and a buyer of goods and services, as well as in connection with the Group's lending and investment activities.

This report describes how DNB Bank ASA (DNB) works with due diligence, measures and monitoring when risk is identified. The report covers the period from 1 January 2025 to 31 December 2025.

The report describes the integration of accountability in DNB's guidelines, due diligence, findings and measures implemented within the DNB Group and its subsidiaries that have a reporting obligation in 2025. DNB carries out due diligence in accordance with the Norwegian Transparency Act (Act no. 99 of 18 June 2021)¹.

About DNB

DNB is Norway's largest financial services group and is among the largest in the Nordic region. The Group offers a complete range of financial services through its mobile banking app, online bank, customer service centres, branch offices and international offices, as well as real estate services. DNB's strong position gives it a unique opportunity and special responsibility to contribute positively to society. The Group has around 240 000 corporate customers and 2.4 million personal customers. DNB's local presence throughout Norway means that the Group is close to its customers. The Group is also represented in 19 countries. At year-end 2025, DNB had 11 649 employees. The employees are DNB's most important resource.

To read more about the Group's business operations and organisation, see DNB's annual report for 2025, which is available on dnb.no/sustainability-reports.

The scope of the report

This report covers DNB Bank ASA, including subsidiaries that have a reporting obligation in accordance with the Norwegian Transparency Act. This applies to DNB Eiendom AS, DNB Boligkreditt AS, DNB Livsforsikring AS, DNB Asset Management AS, DNB Næringsmegling AS and DNB Næringseiendom AS, including DNB Scandinavian Property

Fund HM AS (including Barcode 123 Holding AS, Barcode 123 AS and Vitaminveien 4 AS). The report also includes DNB Eiendomsholding AS and the subsidiaries Vitaminveien 1 AS, Galleriet Kjøpesenter AS and Trondheim Torg AS. DNB Bank ASA is the parent company and makes up the DNB Group together with all of its subsidiaries.

Corporate governance

The Board of Directors of DNB has overall responsibility for the company's operations and sets the Group's strategy and overriding goals. The Board also signs the sustainability statement that forms part of Chapter 3 of DNB's annual report, as well as the Report under the Norwegian Transparency Act. DNB's work with sustainability is presented to the Board and the Group Management team several times a year. In 2025, the Board received, among other things, information about the progress for metrics set within the topics of climate, diversity and equality, as well as quarterly reports about the Group's risk picture, which includes sustainability risk. Read more about how the Group's sustainability work is followed up in DNB's annual report for 2025, which is available on dnb.no/sustainability-reports.

Climate and the environment, social conditions and corporate governance (sustainability or ESG factors) are integrated into DNB's strategy and corporate governance. Governing documents set out how the Group is to work with sustainability and comply with its obligations, and the individual managers are responsible for implementation and compliance with this in their respective entities or units. Read more about corporate governance in accordance with the recommendations from the Norwegian Corporate Governance Board (NUES)² in Implementation of and reporting on corporate governance 2025 and in the sub-chapter ESRS 2 General disclosures in DNB's annual report for 2025 on dnb.no/sustainability-reports.

Support for accountability in DNB's policies and procedures

DNB's Code of Conduct is one of DNB's governance principles documents. The document states that DNB will be a driving force for sustainable transition and that the Group must use its expertise and position to support customers in moving in a sustainable direction. Sustainability must be integrated into DNB's decision-making processes and business operations.

1 Lovdata.no, Act relating to enterprises' transparency and work on fundamental human rights and decent working conditions, <https://lovdata.no/dokument/NLE/lov/2021-06-18-99>.

2 The Norwegian Corporate Governance Board (NUES) publishes the Norwegian Code of Practice for Corporate Governance.

Furthermore, DNB's Code of Conduct states that the Group supports and respects internationally recognised human rights, including those laid down in the UN's Universal Declaration of Human Rights, the UN's International Covenant on Economic, Social and Cultural Rights, the UN's International Covenant on Civil and Political Rights, and the ILO core conventions. DNB complies with regulatory requirements and its own requirements relating to human rights and rights at work in its own operations, including freedom of association and the right to collective bargaining, as well as elimination of all forms of forced and involuntary labour. DNB rejects all forms of human trafficking and child labour and must not use any form of forced labour in the Group's value chain.

The Group policy for sustainability was updated in 2025 and is DNB's overarching governing document for sustainability. In accordance with the policy, the Group must take into account the climate and the environment, take social responsibility and ensure sound corporate governance in all of its operations, including product and service development, advisory services and sales, investment and credit decisions, production, procurement and operations.

The policy also states that DNB must perform risk-based mapping of its value chain in order to reveal the risk of actual and potential infringements of human rights and rights at work that DNB may cause, contribute to or be directly linked to in its capacity as employer, investor,

lender and buyer. Based on the mapping, the Group will implement appropriate measures to stop, prevent or limit negative consequences in accordance with current rules and legislation. In addition, the policy states which international obligations and principles apply to DNB's operations, such as the obligation to comply with the OECD Guidelines for Multinational Enterprises³. In principle, the policy applies to all of the DNB Group's operations, regardless of geographical location, customer group and organisational affiliation⁴, as far as this has been adopted, and has been approved by the Group Chief Executive Officer (CEO). The Group has separate instructions for sustainability in credit activities and for responsible investments, which clarify how the Group policy for sustainability is to be complied with in DNB's work with customers and investments. The Group policy also clarifies roles and responsibilities for follow-up of the sustainability work. The policy is available on dnb.no/sustainability-reports.

DNB's obligation to comply with the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises guides DNB's work to map and minimise risk of human rights violations. Moreover, DNB has undertaken to comply with the Equator Principles, which, among other things, clarify the Group's obligations to respect fundamental human rights in connection with project financing. The obligations are also implemented through the governing documents listed below.

3 The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct are the only multilaterally adopted guidelines, and are the most comprehensive guidelines for responsible business operations. A main objective of the OECD Guidelines is that the business sector contributes to sustainable development. The Guidelines contain clear expectations relating to the business sector's due diligence in areas such as human rights, rights at work, environment, anti-corruption and transparency, <https://responsiblebusiness.no/en/oecd-guidelines/>.

4 The policy does not apply to companies in which DNB has no controlling interest as defined by the Norwegian Private Limited Liability Companies Act, or companies which DNB owns jointly with other financial institutions. Nor does it apply to companies which DNB has taken over or acquired for temporary ownership.

DNB's governing documents for its work with violations of human rights in the value chain:

- **Group instructions for sustainability in DNB's credit activities:** The instructions set out the Group's human rights-related requirements and expectations towards customers to which the Group grants credit. The instructions also apply to issuer-related activities, including DNB Carnegie's facilitation of bonds and issues. The requirements and expectations are reflected in the Group's ESG risk assessment process. All of DNB's customers must, within their sphere of influence, fully support and respect internationally recognised human rights and ensure that they are not involved in violations of these.
- **Group instructions for responsible investments:** These instructions are meant to ensure that DNB does not contribute to violations of human rights or rights at work, corruption, serious damage to the environment, or other actions that could be regarded as unethical. They are also meant to ensure that assessments of risks and opportunities relating to climate and the environment, social conditions and corporate governance (ESG factors) are integrated into the Group's asset management activities.
- **Group policy for purchasing and procurement:** The Group policy is intended to ensure that DNB does business with suppliers in such a way that the Group's requirements for responsible business conduct are met, and that the products and services used in DNB's operations are produced and delivered in a sustainable manner.
- **Group instructions for sustainable procurement and sourcing processes:** These instructions must, among other things, ensure that the Group's requirements relating to responsible business conduct for suppliers are followed up during the contract period through dialogue, analyses and audits. As part of its work with suppliers, DNB must conduct risk-based due diligence, in line with applicable legislation, the UNGPs and the OECD Guidelines for Multinational Enterprises. Any identified breaches of these principles and guidelines must be assessed more closely, and measures must be taken. Suppliers must comply with applicable legislation in the countries in which they operate.
- **Group instructions for third-party risk management in DNB:** DNB has dealings with many kinds of third parties, including suppliers, agents and cooperating banks. The purpose of these instructions is to set out principles for the risk assessments DNB must carry out before concluding an agreement with a third party, and for how the risks are to be followed up during the contract period. The content of the risk assessment of a third-party relationship will depend both on the third party concerned and on the content of the specific agreement to be entered into. The risk assessment will cover many different risk types, including risks relating to regulatory requirements, reputation, security and commercial matters. The assessment and follow-up must be carried out with a view to identifying the overall risk the agreement could pose to DNB.
- **DNB's Code of Conduct for third parties:** The Code of Conduct was updated in 2024. It is based on international frameworks, and contains clear requirements in the areas of human rights and labour standards, environmental management and ethical business conduct in own operations. It also specifies that business partners are under an obligation to comply with all laws and regulations associated with decent working conditions and human rights in their business operations, and that they must communicate similar principles in their own supply chain.

Due diligence

Performing due diligence is a key part of DNB's efforts to safeguard fundamental human rights and decent working conditions. Due diligence is a process that is implemented to identify and document the extent to which DNB, through its operations, has an adverse impact on fundamental human rights and decent working conditions, so that it is possible to prevent and mitigate the Group's adverse impact.

The UNGPs and the OECD Guidelines for Multinational Enterprises state that responsibility for avoiding negative consequences for human rights, and for handling these, includes both the company's own operations and impact that can be directly linked to the company's operations, products and services. DNB must perform due diligence of its own operations, of its business partners, of its supply chain, and of its lending and investment activities, and the due diligence must be carried out in accordance with the

recommendations in the OECD Guidelines for Multinational Enterprises.

DNB must be proactive and prevent violations of the rights that the Norwegian Transparency Act is intended to safeguard. In the event that DNB is directly involved in human rights violations, the Group must help rectify the situation, when required, and ensure that compensatory measures are implemented. DNB must also communicate with the affected rights holders about how the Group has dealt with the situation.

Mapping and assessment

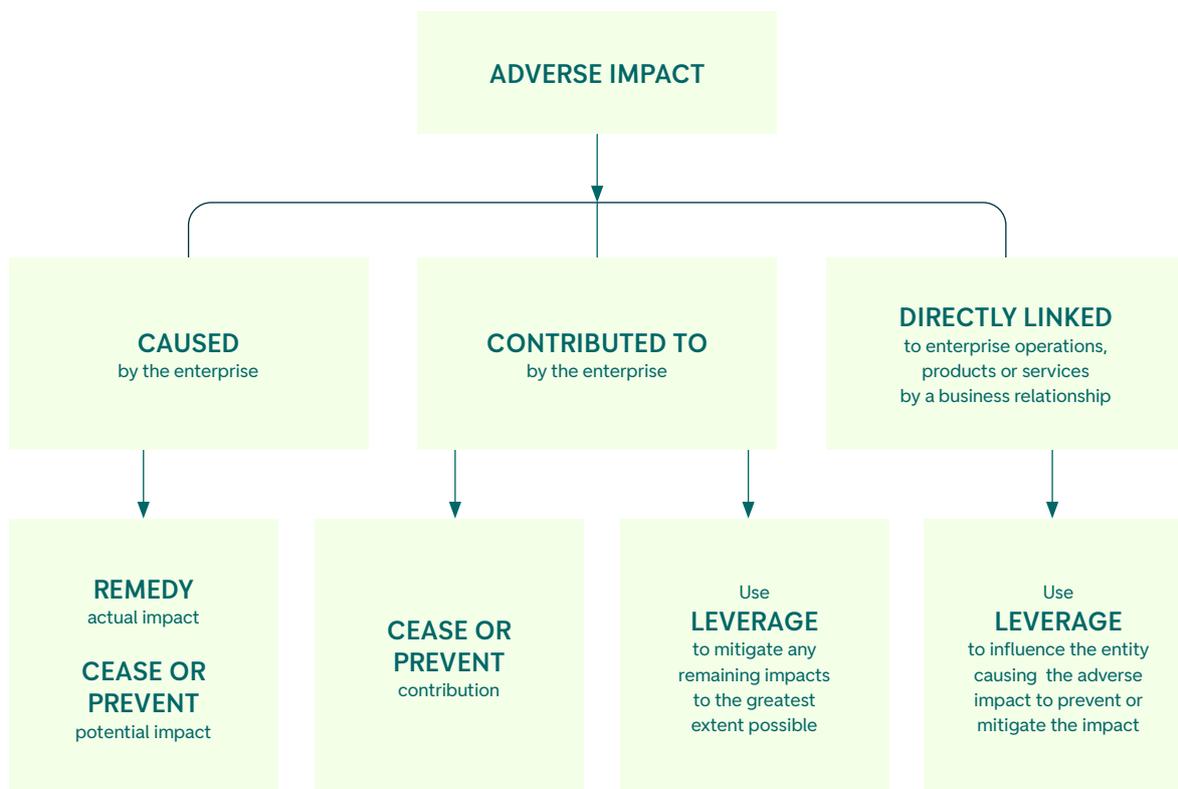
DNB takes a risk-based approach to its work on due diligence. To assess which areas have the greatest risk of violations of human rights and decent working conditions, the Group has mapped its operations and performed assessments of where the risk is the greatest. Factors such

as which products and services are bought, the country of origin of products and services, and suppliers', customers' and companies' maturity, activities, industry exposure and geographical exposure are among those that are of significance to the risk assessment. Finally, regardless of country and sector, the Group makes an assessment as to whether DNB may have a greater responsibility for any adverse impact.

Duty of confidentiality

As a financial institution, DNB has a far-reaching statutory duty of confidentiality associated with any information about customers or circumstances relating to others that the Group receives while carrying out its business operations. DNB is therefore unable to share information about customer relationships and has limited opportunity to share information about sectors or geographical locations that, together with other data points, could reveal confidential information.

Managing adverse impacts⁵



⁵ [OECD Due Diligence Guidance for Responsible Business Conduct](#), page 72.

Report on due diligence

Below is a report on the areas in DNB that are considered to be material, as well as information from subsidiaries that have a reporting obligation.

Purchasing and procurement

Organisation

The aim of the management of purchasing and procurement is to ensure that DNB complies with applicable rules and legislation and internal guidelines when entering into contracts, and that the Group purchases products and services at the right price, of the right quality and at the right terms.

The purchasing functions in DNB are divided between purchases that are IT-related and non-IT-related.

The purchasing functions assist most Group companies with their procurement processes, and are legally placed in the parent company DNB Bank ASA. In cases where the purchasing functions are not involved in the process, the Group companies must follow the applicable purchasing instructions.

Agreements that cover purchasing of products and services relating to DNB's critical functions are followed up separately, in accordance with the requirements relating to purchase of such products and services.

The Group units and business areas are contract owners, and enter into agreements and contracts in collaboration with the relevant purchasing function. The contract owners have operational responsibility for identifying risks associated with the supplier relationship and for ensuring that any relevant risk-mitigating measures are reflected in the contracts that are entered into. They are also responsible for ongoing monitoring of the contractual relationship.

Important purchasing categories in the Group are development and operation of IT solutions, marketing and consulting services, and goods and services relating to properties and office equipment.

Geographical location of suppliers

In 2025, DNB purchased goods and services in Norway worth approximately NOK 13 billion. 121 suppliers accounted for approximately 80 per cent of the Group's purchasing costs. Of DNB's approximately 4 000 suppliers, 84 per cent are based in the Nordic region, the UK or the US, while less than 1 per cent come from countries that may entail a higher risk of violations of human rights and rights

at work. The assessment of higher-risk countries is based on the EcoVadis category, as well as DNB's list of countries with a risk of corruption. This assessment has been integrated into DNB's risk assessment tool.

Mapping and assessment before entering into contracts

All suppliers that enter into a contract with DNB are assessed for several risk aspects before entering into the contract, including issues relating to ESG, anti-corruption, anti-money laundering, the General Data Protection Regulation, security, IT security and financial risk. In addition, the suppliers are assessed regularly during the contract period to detect whether the risk has changed during the contractual relationship. Respect for human rights and decent working conditions, including diversity and inclusion, are factors that are included in the regular assessment of suppliers. For suppliers with higher inherent risk, for example, suppliers operating in a sector and/or country with a greater risk of human rights violations, a more thorough assessment is performed before entering into the contract. This can be a matter of obtaining more information from the supplier or from external sources, or of the decision to enter into a contract being made at a higher management level in DNB. For suppliers that can find themselves in or that are exposed to situations characterised by war and conflict, the risk of serious human rights violations increases. In line with the OECD Guidelines for Multinational Enterprises, DNB will carry out enhanced due diligence when suppliers have exposure and/or ties to such situations.

Identified risks

DNB performed risk assessments of 768 companies in 2025. Of these, 135 (18 per cent) had higher inherent risk (based on industry and country risk) of lack of respect for human rights. The companies that were assessed included providers of IT services, information technology, software and products. The risk assessments revealed lack of commitment and references to internationally recognised principles and guidelines for human rights and rights at work in policies, unwillingness to accept DNB's Code of Conduct for third parties and/or unclear sustainability strategies. Immaturity in the work to identify human rights violations was also identified. In some cases, non-compliance with the reporting requirement under the Norwegian Transparency Act was observed, as well as non-compliance with corresponding reporting obligations. To reduce DNB's risk, a more thorough assessment is performed of such providers before entering into contracts. In some cases, the assessment is brought to the Non Financial risk Committee (NRFC) before entering into contracts.

DNB has observed that larger companies are generally better equipped to respond when the Group requests procedures and guidelines relating to due diligence in the value chain, while smaller companies often do not have a clear picture of their value chains or have not allocated sufficient resources to respond satisfactorily.

In addition to the risk identified before entering into agreements, during regular assessments or through monitoring alerts, ongoing work is also done on following up the supply chain. If it is revealed that the products DNB buys from a supplier entail higher risk, this can trigger measures regardless of the inherent risk that has been identified for the supplier. Adverse media relating to suppliers or products can also lead to a need for new assessments and risk-mitigating measures.

Measures

To mitigate DNB's risk of contributing to human rights and rights at work in the supply chain, the Group implements various preventive and concrete measures that are described below.

Contractual terms and conditions

When entering into new supplier agreements, in principle, all suppliers must accept DNB's standard contractual terms and conditions, as well as the Code of Conduct for third parties. This means, among other things, that suppliers must prohibit child labour and forced labour, ensure fair working conditions and the right to organise, prohibit discrimination and harassment, and safeguard decent working hours and a salary it is possible to live on.

In cases where the supplier does not accept DNB's Code of Conduct for third parties, a determination is made as to the extent to which an exception is acceptable, and how human rights and rights at work can best be covered by the contract, for example by including the supplier's own ethical guidelines. Ethical guidelines are included in 99.6 per cent of the Group's supplier agreements.

DNB places significant emphasis on human rights and rights at work in procurement processes before entering into contracts. A procurement process involving several law firms began in 2024 and continued in 2025. Decent working conditions was an important assessment criterion in this process. The industry is known for high workloads and challenges relating to gender pay equality, and DNB has therefore had a strong focus on these issues. In 2025, this led to DNB requiring that suppliers assign more resources to each engagement. In addition, fixed meeting places were established with suppliers, where the workload and measures to reduce this were followed up. This has led to a

reduction in the risk of high workloads for individuals working for suppliers.

The textile industry is another industry identified as entailing elevated inherent risk, and procurement of textiles is therefore associated with higher risk. In 2025, DNB entered into an agreement with a new supplier of sportswear for profiling and personal purchases. A critical requirement in this process was the Group's expectations relating to the supplier's requirements and follow-up in their own supply chain, including the supplier's auditing of factories and working conditions in Asia. The measures will be followed up during the contract period with the supplier.

Furniture

In 2025, DNB concluded a procurement process for office furniture. This is another purchasing category that is assessed as entailing higher inherent risk of violations of human rights and environmental challenges. In this process, decent working conditions, recycling and logistics planning, as well as membership of Ethical Trade Norway and an EcoVadis profile were emphasised when choosing the supplier.

When choosing suppliers, DNB generally emphasises an EcoVadis profile, or membership in Ethical Trade Norway, as well as suppliers that can demonstrate relevant certifications. The Group also assesses the companies' sustainability statements.

EcoVadis

DNB requires an EcoVadis analysis for suppliers identified as entailing elevated inherent risk due to industry or country risk, as well as for more strategic suppliers and suppliers with a turnover of over NOK 5 million annually. The results of this analysis are used to monitor and follow up the supplier's sustainability efforts, including their work on human rights and rights at work. At the end of 2025, 185 suppliers, representing 85 per cent of DNB's supplier costs, had a profile in EcoVadis. This was an increase from 80 per cent in 2024. The result of the analysis is used actively in supplier follow-up.

Supplier follow-up

Agreements with suppliers from industries and countries with elevated inherent risk and/or criticality for DNB are followed up more closely during the contract period. The follow-up takes place, among other things, through quality assurance of contract data, reassessments in the Group's risk assessment system and monitoring alerts for following up third-party risk. In addition, there is ongoing dialogue with the suppliers, and implementation of ESG factors is an item on the agenda at established meeting places with suppliers.

When agreements are to be terminated, assessments are made of, for example, deletion procedures and procedures for the protection of personal data.

DNB has started a process with the supplier of food and cleaning services for the Group's offices, and the two parties have jointly looked at how the collaboration can be developed further. The goal is to identify and implement measures that target both social and environmental challenges.

Through this work, DNB has gained a better overview of how suppliers follow up their own value chain, which requirements are placed on their suppliers and the extent to which these requirements are consistent with DNB's Code of Conduct. The work relating to this is ongoing.

DNB's strategic IT partners are assessed as entailing higher inherent risk, as the services are delivered from countries that can entail higher risk of human rights violations. DNB has a local representative that follows up these suppliers on an ongoing basis. In addition, in the autumn of 2025, other representatives of the DNB Group visited suppliers. The Group's strategic IT partners have also been audited several times.

The agreements are followed up closely during the contract period, and there is reporting on, among other things, overtime and employee satisfaction, as well as diversity and inclusion. The suppliers' ESG reporting is also reviewed.

If DNB's suppliers lack policies or strategies relating to sustainability, or are immature in their mapping of the risk of human rights violations, these issues must be followed up during the contract period through progress plans and reporting during the contractual relationship. Notification channels, surveys of employee satisfaction and HSE procedures are examples of the topics that are discussed.

In 2025, DNB conducted three 'see-to-it' duty examinations⁶ of its business partners in hotel, coach transport and cafeteria services. No violations of salary or working conditions were identified during these examinations.

Monitoring alerts

In addition to EcoVadis analyses, separate systems are used to monitor the supply chain during the contract period (from the analysis and data providers Reprisk and Dow Jones). If DNB receives notification of a potentially negative

incident, thorough examinations are made and, if applicable, measures are implemented.

If there is suspicion of potential violations of DNB's Code of Conduct for third parties, a dialogue will be initiated with the supplier to gain a clearer picture of the matter. If efforts to influence a supplier through dialogue are unsuccessful, DNB reserves the right to terminate the agreement. In 2025, no agreements were terminated due to violations of human rights and/or rights at work. However, DNB chose not to proceed with certain suppliers in the early stages of procurement processes, based on industry and country risk.

Contributions to reducing adverse impacts

DNB also implements various measures to safeguard sustainability considerations and minimise adverse impacts starting from the ordering phase. For example, the Group seeks not only to procure durable and more environmentally friendly products but also to place orders as early as possible to reduce overtime work at manufacturers. Further, the Group seeks to prioritise sea freight over air transport.

In the same way, DNB aims to order consulting and legal services as early as possible to reduce the risk of a heavy workload and use of overtime.

In past years, DNB has carried out large procurement processes for furniture and IT equipment. These are industries in which the Group's suppliers may have a complex value chain for commodities and production, and where DNB's influence on and follow-up of matters relating to human rights and decent working conditions can be challenging. In addition to following up these suppliers, DNB has worked actively to minimise purchases, by reusing and repairing products. It has been DNB's ambition to reduce the Group's potential negative contributions to challenging working conditions at factories, as well as to reduce its environmental impact and to promote cost cutting.

DNB participates in several external ESG forums, including with other purchasing organisations. The Group finds that meeting places like this, that enable a cross-sectoral dialogue on common challenges and best practices, are useful learning arenas.

In 2025, DNB upgraded its tool for third-party risk management (TPRM 2.0). The system ensures that risk assessments across risk areas are integrated better in the Group's processes. This increases the quality of the Group's

⁶ The 'see-to-it' duty (påseplikten): A statutory obligation to check that the salary and working conditions of a company's subcontractors are in line with applicable application regulations: [Regulations relating to the obligation to provide information, the see-to-it duty and the right of inspection \(in Norwegian only\) – Norwegian Labour Inspection Authority](#).

assessments of third-party risk. The upgrade will lead to more risks being included than today. The dashboard for management and control will also be improved. TPRM 2.0 will be implemented in 2026.

Own employees

Organisation

The Group unit People & Communication manages DNB's employer responsibility at a centralised level. As an employer, DNB must respect fundamental human rights and rights at work and safeguard decent working conditions. The Group's internal personnel handbook generally contains information and guidance for managers and employees relating to schemes, rules and procedures, to ensure a good understanding of DNB's employer responsibility, and that this is exercised properly. DNB attaches importance to ensuring that all employees have working conditions that promote health and allow them to develop, through ongoing, targeted HSE work that is based on mapping and risk assessments. DNB is bound by collective agreements with six trade unions, which contributes to proper working conditions in the Group and promotes a good dialogue between the parties on work-related matters.

DNB does not tolerate any form of harassment or discrimination, and will promote equality and prevent discrimination through targeted and planned work. Read more about how the Group maps and works with equality and measures to combat discrimination in the report on the activity duty and the duty to issue a statement for DNB on dnb.no/sustainability-reports. Read more about how the Group works to ensure equal treatment and equal opportunities for all in DNB's annual report for 2025 in the sub-chapter ESRS S1 Own workforce.

Mapping and assessment

In general, there is low risk of HSE-related incidents in office activities. The risk of serious violations of human rights and rights at work is considered to be low for employees in DNB. The background for this is that Norway has a well-established and sound framework for the working environment in offices that is safeguarded through the Norwegian Working Environment Act and national rules to combat discrimination.

DNB has established a structure for collaboration with the safety representative function through the working environment committees at Group and area level. Relevant issues relating to the working environment, including findings in DNB's employee surveys, are discussed in the committees. The results from the surveys are also followed

up in the units, and units that have a low score are followed up particularly closely.

Employees who experience differential treatment, discrimination or other negative incidents can report the matter via the management, the HR function, the safety representative (email or in person) or the Group's external notification channel (varsling@dnb.no). Procedures have been established for complaints processing, and matters that are brought up through the notification channels are monitored and followed up. The greatest and most serious risk to DNB employees is the risk of harassing behaviour, violence and threats of violence from customers.

Identified risks

The main operations of DNB Bank ASA are within an industry with few occupational accidents and low HSE risk. This is confirmed by the results of the mapping and registration of incidents. Advisers who have contact with customers can occasionally be exposed to harassment and threats from customers. The employee survey for the fourth quarter of 2025 shows that such events still occur, but that the number of events has declined since 2024.

In connection with the annual risk assessment of central HR processes in line with Section 26 of the Norwegian Equality and Anti-Discrimination Act, no risk of discrimination at system level has been identified in these processes. Nonetheless, an inherent risk of discrimination when exercising discretion in certain process steps has been identified. Controls have been established that reduce risk, and the residual risk is therefore considered low. See a more detailed description in the report on the activity duty and the duty to issue a statement for DNB on the website dnb.no/sustainability-reports.

Measures

Employees who are at risk of experiencing unwanted customer behaviour undergo training in how to handle this, and DNB has procedures in place to support and follow up the parties affected by this type of incident.

Training:

- training for customer advisers on handling difficult and aggressive customers;
- tools for managing demanding customer interactions;
- regular departmental focus on violence and threats;
- leadership training on the topic to ensure that managers do preventive work within their departments and understand the importance of follow-up after incidents.

Procedures:

- the Chief Security Officer is involved in all cases and assesses whether incidents should be reported to the police;
- employees who experience incidents receive internal follow-up from their manager and the HSE team, with crisis support from occupational health services as needed;
- follow-up and debriefing as required.

Lending to corporate customers

Organisation

Lending activities for corporate customers take place in DNB's business areas Large Corporates & International (LCI) and Corporate Banking Norway (CBN). The Group instructions for sustainability in DNB's credit activities clarify DNB's Group policy for sustainability, formalise sustainability as part of the risk assessment in all granting of credit and describe roles, responsibilities, organisation and processes relating to sustainability risk assessments. In line with the OECD's sector-specific guidelines for responsible lending practices, DNB has integrated due diligence into the credit activities that target the corporate market.

If customers cause, contribute to or are linked to violations of human rights or rights at work through products and services delivered to business associates, DNB will seek to exert influence on the customer through dialogue to ensure that the causes of the violations cease and that rights holders receive damages for non-pecuniary loss from the party that caused the violation. DNB will prioritise efforts to influence existing customers through dialogue when there are indications or suspicion of violations. The Group will maintain an ongoing dialogue with customers exposed to a high risk of violations of human rights and rights at work, either within their own operations or through their supply chains. The goal of this dialogue is to gain a better understanding of DNB's own indirect risk, but also to contribute constructively by proposing additional risk-mitigating measures for customers. Lasting violations of human rights or rights at work or long-term high-risk exposure to such breaches without implementation of adequate risk-mitigating measures may have consequences for DNB's relationship with the customer.

Mapping and assessment

Relevant assessments of ESG factors must be included in all credit proposals. When credits are renewed once a year, there must always be a full review of the ESG risks. For all customer relationships with a total credit commitment of over NOK 8 million, significant ESG risk must be analysed and commented on in the credit proposal, and there must be

an assessment of the extent to which the risk is acceptable or whether it is necessary to conduct further analyses and/or that a higher decision-making level must grant the credit. For customers with a credit commitment of more than NOK 50 million, a risk classification must also be performed, using an ESG risk assessment tool that has been developed in-house. The tool covers four thematic areas: climate, environment, social conditions and corporate governance. These analyses map, among other things, how customers work to safeguard basic human rights, decent working conditions, equality and diversity in their own operations and in their supply chain. External information sources are used in the risk assessment to help identify circumstances that may require more thorough due diligence. The risk assessment places particular emphasis on the extent to which customers comply with the OECD Guidelines for Multinational Enterprises. Non-compliance with these guidelines, or indications of a lack of routines for compliance with the guidelines, contributes to higher ESG risk in the Group's risk scoring of customers, and in certain industries, these customers will automatically be placed in a high-risk class. If serious circumstances are identified, this will affect the final ESG risk classification and the decision-making level for granting credit.

If the ESG risk is assessed as high, DNB will establish time-bound customer action plans to mitigate the risk. In 2025, DNB performed 2 620 risk classifications using the ESG risk assessment tool. Together with other relevant sources of information, the risk classifications have provided the basis for the Group's customer action plans and prioritised customer dialogues.

Identified risks

In 2025, DNB identified high risk exposure in the value chains of certain customers in the transport sector. For several of these customers, their activities entail procurement of buses, cars, lorries and batteries, where production and raw material extraction can involve jurisdictions and value chains with elevated risk. DNB accordingly had a dialogue with several companies in the transport sector during the year. The Group also identified elevated risk among certain customers with operations in or ties to areas affected by violence, unrest and conflict.

DNB has identified varying quality and completion rate in the customers' due diligence work, but in general, the Group sees increased maturity among its customers. Large companies with considerable risk exposure have often established a clear understanding of risk and have implemented relevant risk-mitigating measures, supplier requirements and follow-up in line with the expectations relating to responsible business conduct in the OECD

Guidelines for Multinational Enterprises. Some also carry out more risk-based controls and audits of suppliers in prioritised parts of the value chain. Smaller companies may have more limited resources to carry out similar follow-up, and they may have competence gaps relating to both the mapping of risk and the consequences of inadequate follow-up. Such gaps can increase the risk on the part of both the customer and DNB of being directly linked to negative influence through business relationships in the supply chain.

Measures

1) Enhanced requirements relating to ethics and third-party follow-up of the transport sector

As part of the bank's risk-based follow-up, in 2025, DNB asked certain customers in the transport sector to accept its Code of Conduct for third parties (including expectations towards the customer's suppliers and other business partners). The purpose was to clarify the expectations relating to responsible conduct in the value chain, to establish a more consistent contractual basis and to strengthen follow-up of identified risk in the prioritised supply chain.

2) Enhanced due diligence for customers with operations in or ties to areas affected by violence, unrest and conflict

DNB has conducted enhanced due diligence of customers with operations in or ties to such high-risk areas. This includes:

- extended mapping of the customers' activities, value chain and business relationships;
- increased requirements relating to documentation, management systems and risk-mitigating measures;
- clearer expectations relating to ongoing due diligence and reporting when so indicated by the risk level.

The measures are defined as context-based risk management, and not as positions taken concerning specific countries or players, and must contribute to the bank acting in line with the OECD's expectations relating to responsible business conduct and relevant practice in the rules and legislation and by the authorities.

3) Continuation of work relating to shipyards and follow-up of working conditions

DNB has continued the dialogue with customers who build ships at shipyards in jurisdictions with high inherent risk of violation of human rights and rights and work, with particular follow-up from the bank in line with the OECD guidelines.

4) Responsible Ship Recycling Standards – contractual clauses

In accordance with the Group's commitment to the Responsible Ship Recycling Standards and the objective to

include a clause on responsible recycling of ships in loan agreements, DNB is continuing the practice of including clauses on responsible recycling in new and refinanced loan agreements with collateral in ships.

Facilitation activities relating to bond loans and share issues in DNB Carnegie

Organisation

DNB Carnegie is a business area in DNB Bank ASA in Norway, and constitutes the DNB Group's securities and investment bank operations. The business area offers a wide range of investment services, including – but not limited to – trade in financial instruments, currencies and fixed-income securities, analyses, and corporate finance advisory services associated with mergers, acquisitions and sales. DNB Carnegie also offers facilitation of share issues, initial public offerings (IPOs) and structured financing solutions in the global debt and share market.

Mapping and assessment

As part of DNB Carnegie's mandate processes, a holistic assessment is conducted of each customer and each engagement. This assessment includes commercial, regulatory and sustainability-related circumstances. For facilitation activities, this entails the following, among other things:

- ESG-related issues and potential sustainability risk are assessed as one of several factors in the decision as to whether DNB Carnegie should take on an engagement and accept a mandate;
- the assessment is made before all engagements, as part of the review by the Engagement Committee, where relevant questions relating to the area of operation are included in the Engagement Committee memo;
- the assessment covers the issuer, market exposure, geographical and sectoral factors, and whether the transaction may entail reputational, sustainability or compliance risk.

Identified risks

The mapping can identify different types of risk relating to issuers, counterparties or transactions, including:

- risk of lack of transparency on ESG factors or reporting;
- risk of adverse impact on people, the environment or society, for example in sectors with elevated sustainability risk;
- risk that facilitation services can be seen as violating expectations in the OECD's guidelines, other international standards or the Norwegian Transparency Act;

- risk that the engagement is not considered to be consistent with DNB's expectations relating to responsible operations.

When such risk is identified, this is assessed in relation to DNB Carnegie's internal framework, possibly supplemented by internal Group frameworks. This in turn may lead to further examinations, delimitations in the delivery or a decision to not take on the engagement.

Measures

DNB works on an ongoing basis to secure good processes for ESG risk assessment and facilitation activities.

Status of integration after Carnegie acquisition

Integration work is being carried out relating to companies that became part of the DNB Group in connection with the acquisition of Carnegie in March 2025. This process includes a step-by-step assessment of how DNB's governing documents might be implemented in these companies.

Based on the customer portfolio that was transferred from Carnegie's Norwegian operations, no material changes in the geographical exposure have been identified, nor has sectoral activity or other circumstances that indicate a significant increase in sustainability risk following the integration.

DNB Asset Management AS

Organisation

DNB Asset Management AS (DAM) offers securities and asset management services for personal and corporate customers in Norway and other countries. DAM is a wholly owned subsidiary of DNB Bank ASA and belongs to the business area Wealth Management.

Mapping and assessment

The Group instructions for responsible investments are intended to ensure that DNB does not contribute to violations of human rights or rights at work, or to corruption, serious damage to the environment or other actions that could be regarded as unethical. They are also meant to ensure that assessments of risks and opportunities relating to ESG factors are integrated into DAM's activities and form the basis for DAM's exercise of ownership rights. Through the exercise of ownership rights, DAM attempts to influence companies that it has invested in, or may invest in, through its mutual funds and products. DAM's exercise of ownership is based on the UN Global Compact and the OECD Guidelines for Multinational Enterprises, and is in line with the UNGPs. The exercise of ownership is safeguarded through dialogue,

voting and other influence work, where DAM attempts to influence companies to make positive changes. If there is an unacceptable risk of a company violating the Group instructions for responsible investments, DAM can encourage the company to rectify the reason for the possible breach or remove the company from the investment universe.

Identified risks

2025 was characterised by increased geopolitical tension where conflicts have had negative effects on the humanitarian situation in several countries. A priority for DAM in 2025 was to comply with the obligations under international humanitarian law and to perform enhanced due diligence when so required. Even though DAM assesses the risk of human rights violations and decent working conditions – as defined in the company's expectations document relating to human rights – as low in large parts of the portfolio, the company has identified exposures in conflict areas. DAM conducts enhanced due diligence when identifying companies that have operations in or ties to such areas. In addition to having an increased focus on humanitarian law and countries experiencing conflicts, DAM works on an ongoing basis with sectors and countries with an elevated risk of violations of human rights and rights at work. See DAM's [expectations document for human rights](#) for more information about the assessment of particularly elevated risk. DAM carries out an annual country risk assessment that includes analyses of corruption risk, civil liberties and macroeconomic circumstances, as well as of relevant international indices prepared by the International Monetary Fund and other recognised institutions.

Measures

For investments in companies that operate in sectors or areas with an increased risk of violations of human rights and rights at work, DAM attempts to engage in a proactive dialogue with the companies on their procedures for identifying any violations. If there are already indications that a company's operations violate the Group instructions for responsible investments, DAM conducts reactive dialogues with the companies, as described in the section above on mapping and assessment of risk. If the company does not display a willingness to change, the company can be excluded as described above.

In 2025, DAM had dialogues with 55 companies on human rights and rights at work. The company voted on 152 proposals submitted at general meetings. Among these, 114 came from shareholders and 38 were submitted by the management and addressed purely social matters. Details about DAM's dialogues, exclusions and voting can be found

in DAM's annual report for responsible investments, which is available on DAM's website⁷.

To ensure efficient and ongoing mapping and assessment of DAM's exposure towards countries experiencing armed conflict or elevated risk of violations of human rights and rights at work, in 2025, the company updated its tools for assessment of country risk and due diligence.

DAM also prepares reports on its investment portfolio in accordance with the requirements of the Sustainable Finance Disclosure Regulation (SFDR). DAM considers the SFDR's due diligence requirements for investments to be complementary to those in the Norwegian Transparency Act. The SFDR requires reporting at the mutual fund and investment portfolio level, based on Principal Adverse Impact (PAI) indicators. This is a set of sustainability metrics that map potential adverse impacts on ESG factors resulting from investments. DAM's PAI reporting also covers selected voluntary PAI indicators that, among other things, cover the proportion of companies in DNB's portfolios that have adopted ethical guidelines for their supply chains. The full PAI report and fund-specific report in line with the SFDR requirements are available on DAM's website.

DNB Livsforsikring AS

Organisation

DNB Livsforsikring (DNB Liv) is a wholly owned subsidiary of DNB Bank ASA and is an integrated part of the DNB Group. As one of the leading life insurance companies in Norway, DNB Liv offers pension, savings and insurance products to personal and corporate customers in Norway.

For DNB Liv as a capital owner, the risk of actual or potential negative consequences for fundamental human rights and decent working conditions is related to the companies the Group invests in. DNB's Group instructions for responsible investments integrate the OECD Guidelines for Multinational Enterprises, among other documents, into the Group's requirements relating to responsible investment practices. The Group instructions provide guidance for DNB Liv as a capital owner and for any party that manages funds on behalf of DNB Liv.

Mapping and assessment

DNB Liv has appointed people in the company to be responsible for ensuring that regular risk assessments and due diligence are conducted of the supply chain, business partners and own operations. These assessments are risk-based and focus on areas in which the risk of serious consequences is the greatest.

DNB Liv has established procedures and processes for mapping and risk assessment of all contractual relationships. The risk associated with contractual relationships is assessed before entering into a written agreement. Existing agreements are assessed annually.

DAM and DNB Næringsseidom (DNB NE) manage most of DNB Liv's investments, which is why their due diligence is also relevant to DNB Liv's investments. Read more about how DAM and DNB NE conduct due diligence in the sections on DNB Asset Management AS and DNB Næringsseidom AS.

DNB Liv works actively to ensure a good working environment. This includes regular employee surveys, performance reviews and a dedicated safety representative with clear guidelines. Read more in the section Own employees.

DNB Liv has operational responsibility for identifying risks associated with the supplier relationship and any risk-mitigating measures before agreements are signed and for ensuring that relevant measures are reflected in the contracts. The company is also responsible for following up the contractual relationship on an ongoing basis, in line with DNB's governing documents relating to purchasing and procurement.

Identified risks

The due diligence has not identified a high probability of potential negative consequences relating to fundamental human rights and working conditions among its suppliers and business partners.

Measures

DNB Liv follows DNB Bank ASA's applicable governing documents, as well as the Group's instructions, guidelines and personnel policies. DNB enters into Group-wide agreements, which DNB Liv also uses. New customers are assessed against the anti-money laundering rules and legislation.

If it is discovered that DNB Liv has directly caused or contributed to violations of fundamental human rights or decent working conditions in its own operations, in its supply chain or among any of the company's business partners, measures will be implemented to ensure that those responsible for the violations remedy the situation.

⁷ <https://dnbam.com/en/sustainability/policies-and-reporting>.

DNB Eiendom AS

Organisation

DNB Eiendom is a subsidiary of DNB Bank ASA, and one of Norway's largest nationwide real estate firms, with about 860 employees at 90 offices located throughout Norway. The company sells private homes, holiday homes, new builds and agricultural and commercial properties, and offers advisory services throughout the whole sale and purchase process.

Mapping and assessment

DNB Eiendom is covered by DNB's governing documents and guidelines and has routines and processes for mapping and regular risk assessment of suppliers. DNB's standard contract terms and conditions and Code of Conduct for third parties are part of the foundation for the contractual relationship with DNB Eiendom's suppliers.

DNB Eiendom works actively to ensure a good working environment and has its own ethical guidelines in addition to the Group's. Regular employee surveys and dialogues are conducted, as well as HSE surveys and dialogues with employee representatives to identify and manage any issues. The company also carries out regular equal pay surveys. The company has a dedicated safety representative and has established specific guidelines for this role.

Identified risks

The evaluations have not identified serious non-conformities or a high probability of potential negative consequences relating to fundamental human rights and working conditions among its suppliers and business partners.

DNB Eiendom sees an elevated risk of employees being exposed to unwanted customer behaviour and threats, even though there has been a decline in such incidents since 2024. While threats against the bank are often directed towards DNB as a Group, the threats against DNB Eiendom often appear to more directly target individual employees with direct customer contact.

Measures

DNB Eiendom follows the Group's governing documents, as well as the Group's instructions, guidelines and personnel policies. DNB enters into Group-wide agreements, which DNB Eiendom also uses.

Strict requirements are placed on procurements. All suppliers undergo a risk assessment and details surrounding contractual matters are set out in contracts. Corrective measures are implemented as needed, allowing DNB Eiendom to influence suppliers and require improvements.

DNB Eiendom evaluates feedback and notifications and implements measures when needed. DNB Eiendom focuses on incident registration and management and follows up incidents on an ongoing basis.

DNB Boligkreditt AS

Organisation

DNB Boligkreditt AS (Boligkreditt) is a wholly owned subsidiary of DNB Bank ASA that has a licence as a credit institution, with the right to issue covered bonds. Boligkreditt has a limited role in DNB that only entails providing home financing and issuing covered bonds. The size of Boligkreditt's administration is transparent, as it has four employees. Central operational functions, including the lending process, customer management and issuing of covered bonds, is outsourced to the DNB Group, and performed within the Group's established governance and control frameworks. The Board of Boligkreditt has decided that these will apply to its operations.

Mapping and assessment

The risk has been mapped by taking a risk-based approach to Boligkreditt and the outsourcing situation. The assessment is based on the company's business model, organisation and follow-up of outsourced activities. The direct inherent risk in the company is assessed as low, as a result of Boligkreditt's transparent organisation and administration, among other things. The company has few employees with long seniority in the company, and only roles whose primary function is related to management and control. Boligkreditt's customer portfolio in the bank mainly includes personal customers. A minor proportion of customers are corporate customers, but these are limited to housing cooperatives with a simple business model. There is a somewhat elevated indirect inherent risk, linked to the bank's performance of the outsourced activities for Boligkreditt. This is due to the Group's large number of employees and suppliers.

Identified risks

The bank gives an account of mapping and assessment, identified risks and measures for own employees, as well as for purchasing and procurement in separate sections (see above). It is Boligkreditt's assessment that the residual risk that the bank describes applies to Boligkreditt, but is limited to the areas covered by the parties' agreement. No material residual risk of breaches of basic human rights or decent working conditions has therefore been identified in Boligkreditt.

Measures

Boligkreditt follows DNB's governing documents, guidelines and personnel policy. DNB enters into Group-wide agreements, which Boligkreditt also uses. DNB's governing documents and follow-up mechanisms in the value chains apply to the tasks the bank carries out for Boligkreditt. No need for other separate measures for Boligkreditt has been identified.

DNB Næringseiendom AS

Organisation

DNB Næringseiendom AS (DNB NE) is a wholly owned subsidiary of DNB Livsforsikring AS. DNB NE develops and manages office buildings, shopping centres and hotels in Norway and Sweden. DNB NE manages the property portfolios of DNB Livsforsikring AS and DNB Scandinavian Property Fund HM AS (DNB SPF).

DNB NE is also licenced to manage alternative investment funds (AIFs), and in 2025, performed management tasks for the property funds DNB SPF Fund and DNB Eiendomsfond Core Plus (DNB ECP).

The report for DNB NE covers all of DNB NE's operations, including DNB SPF (including Barcode 123 Holding AS, Barcode 123 AS and Vitaminveien 4 AS). The report also includes DNB Eiendomsholding AS and the subsidiaries Vitaminveien 1 AS, Galleriet Kjøpesenter AS and Trondheim Torg AS. DNB Eiendomsholding AS is a subsidiary of DNB Livsforsikring AS and owns property investments on behalf of DNB Livsforsikring AS.

DNB NE follows the Group's instructions and guidelines for carrying out due diligence.

Mapping and assessment

DNB NE has established procedures and processes for mapping and risk assessment of all contractual relationships. Read more about the risk assessment tool in the section on purchasing and procurement. The risk relating to suppliers is part of the decision-making basis for the choice of suppliers and is assessed before agreements are signed. Suppliers are also followed up during the contractual relationship. In 2025, there were two audits of suppliers. In addition, controls are performed of salary and working conditions in projects.

Identified risks

On behalf of its clients, DNB NE uses various contractors and subcontractors for construction work. In large remodelling and renovation projects, there is an inherent risk of dangerous physical conditions at construction sites, which entails inherent risk of personal injury and other physical injuries. All purchases, as well as remodelling and renovation

projects, entail inherent risk of a lack of employment contracts and poor living conditions for suppliers' and/or subcontractors' workers. There is also a risk of workers having contracts that do not comply with collective agreements or other minimum requirements relating to salary and contractual terms and conditions.

DNB NE makes a number of purchases in connection with its properties. Different risks associated with the manufacture of the products that are bought are identified in the risk tool that is used for procurement. For example, risks associated with country of origin, industry and materials are among those assessed.

Measures

DNB NE focuses on incident registration and management. Incidents and non-conformities relating to property management are registered in a dedicated system. Measures can entail extra follow-up of suppliers, and if necessary, ensuring that the supplier has a special focus on HSE in relation to subcontractors.

All of DNB NE's suppliers must accept DNB's Code of Conduct for third parties.

In addition, to regulate relevant risk, DNB NE enters into individually adapted contracts for each contractual relationship. DNB NE also seeks to enter into framework agreements, and to buy services from a limited number of suppliers to ensure that it has better knowledge of the parties it does business with.

DNB NE has drawn up work manuals for use in property projects. In addition, ongoing work is done on security, alertness and ongoing training in the projects. Further, DNB NE has incorporated a requirement in all agreements with its contractors specifying that they can only enter into agreements with up to two levels of subcontractors. Regular spot checks are conducted at construction sites, during which documentation must be presented. DNB NE has an established audit plan that ensures systematic follow-up of suppliers. The plan contains annual quality audits of selected suppliers to verify that requirements relating to quality, HSE and the Code of Conduct are complied with. Third-party audits are also used for the most critical suppliers, which means that the audits are performed by an independent party. The audits include control of contract terms, working conditions, environmental and sustainability commitments, as well as procedures for notification and compliance with the Norwegian Transparency Act. Furthermore, a third party was audited by the statutory auditor in connection with ISO 14001 certification in 2025.

DNB NE also reports on DNB SPF in accordance with the requirements of the SFDR. Read more about these requirements and their implications in the section on DNB Asset Management AS.

DNB Næringsmegling AS

Organisation

DNB Næringsmegling AS (DNB NM) is a wholly owned subsidiary of DNB Bank ASA. The company provides real estate services primarily relating to commercial property, and offers services linked to purchase, sale, rental and valuation of commercial property. DNB NM's head office is in Oslo, and it has branch offices in Bergen, Trondheim and Stavanger.

DNB NM uses DNB's Group-wide agreements and follows the Group's applicable governing documents, as well as instructions, guidelines and personnel policies.

Mapping and assessment

DNB NM has performed a risk-based assessment of its own operations. The assessment is based on the company's business model and organisation and covers the risk of violations of fundamental human rights and decent working conditions in own operations, as well as through supplier and business relationships.

Identified risks

The mapping has not revealed material risk of actual or potentially negative consequences for fundamental human rights or decent working conditions.

Measures

Based on the mapping, no need has been identified for special measures beyond continued compliance with the DNB Group's established governing documents and routines.

Remedy and damages

If it is discovered that DNB has directly caused or contributed to violations of fundamental human rights or decent working conditions in its own operations, in the Group's supply chain or among any of the Group's business partners, measures will be implemented to ensure that those responsible for the violations remedy the situation. Any

violations will be documented in accordance with internal processes.

Communication and transparency

DNB aims to be transparent about the assessments made in the Group's supply chain and regarding its business partners, and reports on measures and challenges in external reports and enquiries. For more information about DNB's work with sustainability, see the Group's annual report for 2025, which is available on DNB's website, dnb.no/sustainability-reports.

More information about DNB's work on human rights and the Norwegian Transparency Act, as well as how DNB can be contacted, can be found on the Group's website⁸.

Notification channels and complaints mechanism

Transparency is a fundamental principle in DNB. All employees are responsible for acting ethically and for reporting any conduct that violates laws, regulations or DNB's governing documents or routines.

Employees and other personnel who work in DNB are encouraged to speak up about unacceptable circumstances. Employees can raise concerns with their immediate manager, their manager's manager or the relevant specialist unit. If this does not lead to a solution, unacceptable circumstances can also be reported via DNB's notification channel. It is possible to make an anonymous report or contact a trusted person inside or outside the company before making a report. Group Audit manages the DNB Group's notification scheme. DNB also has an external notification recipient⁹ that can process reports and notifications on behalf of DNB.

With regard to the supply chain and the Group's business partners, DNB has facilitated the notification of unacceptable circumstances through various channels, including EcoVadis and the Group's risk management tool. DNB also has a notification channel on its website dnb.no, where stakeholders, suppliers and business partners can contact the Group to report incidents and follow up matters that have been reported.

⁸ dnb.no/sustainability-reports, dnb.no/om-oss/barekraft/menneskerettigheter (in Norwegian only).

⁹ DNB's notification channel is a confidential electronic channel that can be used to report unacceptable circumstances in DNB. The page is on EthicsPoint and is not part of DNB Bank ASA's website, but can be reached via [Varsling | Kontaktpunkter | Om oss fra A til Å - DNB](#) (in Norwegian only).

Oslo, 10 March 2026
The Board of Directors of DNB Bank ASA



Olaug Svarva
(Chair of the Board)



Jens Petter Olsen
(Vice Chair of the Board)



Gro Bakstad



Petter-Børre Furberg



Lilian Hattrem



Haakon Christopher Sandven



Eli Solhaug



Kim Wahl



Vivian Lund



Berit Behring



Kjerstin R. Braathen
Group Chief Executive Officer
(CEO)

The Boards of Directors of the following subsidiaries have adopted the parts of this report that are relevant to them:
DNB Næringseiendom AS, DNB Scandinavian Property Fund HM AS, Barcode 123 AS, Barcode 123 Holding AS,
Vitaminveien 4 AS, DNB Eiendomsholding AS, Vitaminveien 1 AS, Galleriet Kjøpesenter AS, Trondheim Torg AS,
DNB Asset Management AS, DNB Boligkreditt AS, DNB Eiendom AS, DNB Livsforsikring AS and DNB Næringsmegling AS.