


List of Signatures

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 **22-26 Transparency Act_2025_MBK.pdf**

Name	Method	Signed at
Helseth, Sandra Kristin Myhre	BANKID	2026-02-12 16:29 GMT+01
Blomvik, Elisabeth	BANKID	2026-02-12 16:29 GMT+01
Hauge, Kjetil	BANKID	2026-02-12 16:30 GMT+01
Tafjord, Kristian	BANKID	2026-02-12 08:18 GMT+01
Kjerstad, Ole André	BANKID	2026-02-11 08:48 GMT+01



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Statement in Accordance with the Norwegian Transparency Act

For the Financial Year 2025 – Møre Boligkreditt

Confidentiality Level	Tick applicable level	Beskrivelse av konfidensialitetsnivåene
Public	X	Information that is published and/or can be shared without limitations
Internal		Information intended for internal use that would cause limited harm to the bank if disclosed externally
Confidential		Information available to all employees. May only be shared externally when required by law or role (police, external auditor, internal auditor, the Financial Supervisory Authority, etc.
Strictly Confidential		Information accessible only to specific individuals internally, such as inside information or sensitive decision-making documents. May only be shared externally when required by law or role



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1 Background

The Norwegian Transparency Act entered into force on 1 July 2022 with the purpose of reducing the risk of human rights violations and ensuring decent working conditions within an organisation's own operations, its value chain, and its business partners. The Act also aims to secure public access to information. All entities covered by the Act must carry out due diligence assessments and report on these annually. This statement applies to the financial year 2025.

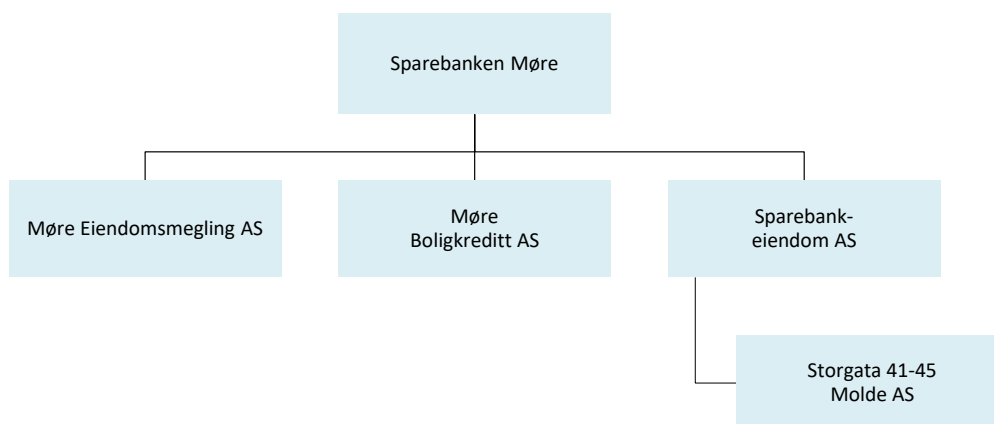
2 About Sparebanken Møre [and subsidiaries]

Sparebanken Møre's purpose is to provide the business activities and services that are customary or natural for savings banks to offer, within the framework of applicable laws and current licences. Sparebanken Møre may also provide investment services and related services in accordance with the Securities Trading Act. The Group is a full-service provider of financial services in the areas of financing, deposits and investments, payment services, financial advisory services, wealth management, insurance mediation, and real estate brokerage. Sparebanken Møre has local offices across Møre og Romsdal and one office in Oslo.

The Board of Directors ensures that a comprehensive annual strategy process is carried out, defining the Group's objectives, strategies, and risk profile. The Board has adopted a set of strategies and management documents forming the basis for sound internal risk management. An overarching sustainability strategy has also been adopted and guides both strategic decisions and day-to-day operations.

Sparebanken Møre consists of the parent company and four wholly owned subsidiaries;

- **Møre Eiendomsmegling** provides brokerage services primarily related to the purchase and sale of residential property.
- **Møre Boligkreditt AS** acquires residential mortgage loans from Sparebanken Møre and finances these through the issuance of covered bonds (OMF).
- **Sparebankeiendom AS** and **Storgata 41-45 Molde AS** own and manage the bank's real estate.



Møre Boligkreditt has an independent obligation to publish a Transparency Act statement. The company has no employees of its own, but hires a managing director from Sparebanken Møre. Since its establishment, the company has purchased administrative tasks and services from Sparebanken Møre, including services related to mortgage portfolio administration, accounting and invoicing, regulatory reporting, control functions, and finance and liquidity management. Sparebanken Møre also provides IT-related services, including infrastructure, network, communication, security solutions, operation and maintenance of general IT services and software procurement. As a result, the supply chain related to these areas largely corresponds with that of Sparebanken Møre. Strategies and guidelines described above also apply to Møre Boligkreditt.

This statement provides an account of Sparebanken Møre's operations and supply chain, the approach to due diligence assessments, and measures implemented, including a description of the mapping and risk assessment carried out. Finally, it outlines the Group's further work under the Transparency Act.

3 Whistleblowing Channels

Internal whistleblowing channel

Sparebanken Møre's whistleblowing procedures ensure safe and appropriate reporting. In addition to internal recipients, an external whistleblowing channel has been established through an agreement with a law firm. Employees are informed about the whistleblowing procedure through e-learning.

Whistleblowing channel for the value chain

Sparebanken Møre has established a channel and procedures for receiving complaints and notifications from customers and other external stakeholders. A written description of these procedures is available on the bank's website. Inquiries are answered in writing and cover all incoming requests. Customers and other affected parties may submit their notifications in writing via our website, on paper at a physical branch, or by telephone to their contact person or customer service.

The sender shall receive a response within 15 days. The bank's Compliance Officer, together with the bank's in-house lawyer if necessary, conducts the first assessment of the case and determines further handling. Incoming cases are reported quarterly to the Board of Directors and management, and annually to the Financial Supervisory Authority of Norway. The bank also conducts an annual review of complaints, claims, and notifications to identify any systematic issues requiring internal measures.

4 Our Work on Due Diligence Assessments

The principles for due diligence assessments are integrated into Sparebanken Møre's operations. Key elements are summarised below, while further details are available in the Group annual report.

Key elements in the due diligence assessment

- Integration of due diligence in governance, strategy, and business model
- Engagement with affected stakeholders at all main steps of the process
- Identification and assessment of actual and potential adverse impacts



- Implementation of measures to prevent, mitigate, or cease adverse impacts
- Follow-up of measures and communication of results

The main governing document is the Group guideline for internal corporate governance, which sets code of conduct. The guideline for ethics and corporate responsibility describes responsibilities, processes, and follow-up across three levels:

- Own operations
- Customers and suppliers
- The society we are part of

These guidelines set expectations for ethical behaviour, human rights, labour rights, equality, social issues, environmental protection, and anti-money laundering and anti-corruption.

Sparebanken Møre performs risk-based due diligence in accordance with applicable legislation and the OECD Guidelines for Multinational Enterprises. As part of this process, the Group implements, monitors, and communicates measures to prevent or reduce negative impacts.

Due Diligence in the Upstream Value Chain

We have worked to further strengthen the integration of due diligence into the bank's well-established supplier follow-up process. Strong governance systems are essential, and due diligence must be part of daily operations.

The bank maintains governance systems that meet the requirements of the Transparency Act through, among others:

- Criteria for selection and assessment of partners (Partner Strategy)
- Guidelines for Sustainability in the Supply Chain
- Procedure for Information Duty – Transparency Act
- ICT Governance System with supplier follow-up routines
- Procedure for supplier follow-up and related agreements

Due Diligence in Own Operations

Through Guideline for equality, diversity and non-discrimination, we are committed to proactively promoting diversity, equality and inclusion, and to complying with all applicable regulations. This includes recognised standards for corporate responsibility and binding agreements such as the UN Human Rights Conventions, ILO Conventions, and the UN Sustainable Development Goals. We maintain zero tolerance for discrimination, human trafficking, forced labour, child labour, or any form of exploitation.

A more detailed overview of the Group's internal work is provided in the chapter "S1 – Own Employees" in the Group annual report.

Due Diligence in the Downstream Value Chain

The bank has several governing documents for due diligence in credit, investments, real estate brokerage and societal engagement. Sound credit assessments and advisory services are high priorities. Due diligence is conducted for all new customers in line with internal policies and the Anti-Money Laundering Act. The assessment of money-laundering risk is integrated into the credit approval process.



The Group sustainability strategy and guidelines for responsible investments ensure that the bank does not contribute to human rights violations, corruption, terrorism financing, tax evasion, severe environmental harm, or other unethical behaviour. Investments shall not be made in companies involved in controversial weapons, including landmines, cluster munitions, nuclear weapons, or chemical/biological weapons, nor in companies involved in pornography, alcohol, or tobacco.

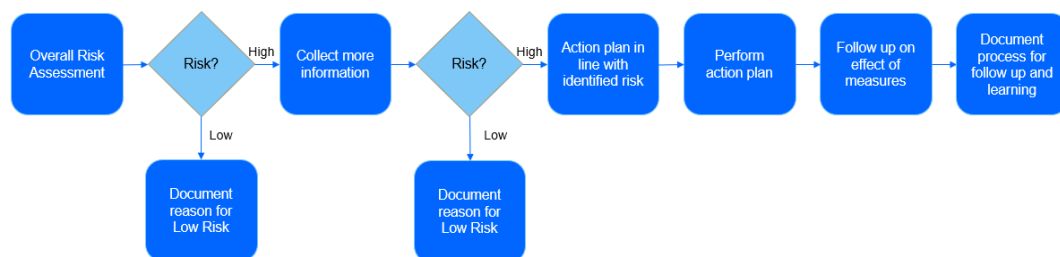
Companies excluded by the Government Pension Fund Global shall not form part of Sparebanken Møre's portfolios.

Fund providers are required to submit an annual ESG report. Any deviations from the bank's guidelines shall be disclosed.

5 Mapping and Risk Assessment of the Supply Chain

The bank follows a process aligned with OECD guidelines. Due diligence assessments are conducted in periodic supplier reviews, as well as through an annual review carried out by the Department for Product and Service Development.

Risk assessment process:



Risk is assessed based on:

- Type of business, product, or service (based on DFØ high-risk product list)
- Type and scale of agreement (ongoing/one-off purchases)
- Supplier and subcontractor geography (Freedom House risk categories)
- Known negative impacts (corruption, violations, social dumping)
- Availability and quality of the supplier's own Transparency Act documentation

If the supplier is subject to the Transparency Act, their public statement is reviewed.

Findings:

In the annual review, we have focused on suppliers and business partners within the categories of consulting firms and legal service providers, consumables, and property and maintenance.

The basis for this selection is an assessment of material risk within these areas, based on media coverage and product category:

- Consulting firms and legal service providers: risk of excessive overtime beyond legal limits
- Consumables: product- and subcontractor-related risk
- Property and maintenance: risk of breaches of decent working conditions

A total of 67 suppliers were assessed.

- 33 were identified with some risk due to product type or activities in high-risk countries. After reviewing their documentation, residual risk was assessed as low.
- Two suppliers lacked publicly available documentation. These are being followed up separately.



– No actual human rights violations or breaches of decent working conditions were identified during the reporting period.

Follow-up actions include dialogue, meetings, on-site audits (if relevant), contractual changes, and ultimately termination of agreements in cases of unresolved risk.

6 Follow-up of Fund Providers

Media and various organisations have increasingly scrutinised investment funds offered by Norwegian banks to assess whether they are exposed to companies operating in ways that contribute to violations of international law or human rights in occupied territories. Sparebanken Møre maintains regular dialogue with fund providers and influences them through active ownership. We work to ensure that the funds we offer carry the lowest possible risk of adverse human rights impacts.

7 Own Operations

The bank complies with Norwegian legislation, including the Working Environment Act. Sparebanken Møre has long maintained a strong focus on health, safety, and the working environment and is subject to the Equality and diversity reporting obligation. The most recent reporting is included in the Group 2025 annual report¹.

No findings have been made concerning negative working environment conditions or human rights breaches internally. Annual surveys are conducted, and results are followed up by management and the Board.

8 Further Work

Due diligence is a continuous process and part of supplier follow-up and the annual assessment cycle.

We continuously assess suppliers when entering new agreements or making changes in existing agreements. Human rights and working conditions are addressed in regular meetings with suppliers; if regular meetings are not established, meetings will be scheduled focusing on these issues. Two suppliers are under follow-up at the reporting date due to lacking publicly available Transparency Act statements.

¹ www.sbm.no/berekraft, group annual report will be available in april 2026.



This document is electronically signed.

Ålesund, 12 Feb 2026

THE BOARD OF DIRECTORS OF MØRE BOLIGKREDITT AS

KJETIL HAUGE, Chair (signed)
ELISABETH BLOMVIK (signed)
KRISTIAN TAFJORD (signed)
SANDRA MYHRE HELSETH (signed)

OLE ANDRE KJERSTAD, Managing Director (signed)



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