

Transparency Act Statement

26 June 2023



B2Holding is a leading pan-European debt investor and servicer. Our vision is to become the leading trusted partner that actively re-shapes the credit management industry. Through our business solutions we contribute to handling society’s debt problems, bridging gaps that defaulted debt represents in the credit chain. Our business is about people and creating shared value for business and society. Being a socially responsible creditor and a trusted solution provider for our partners are fundamental in our way of doing business.

The main business lines are Unsecured and Secured Asset Management. The countries are allocated according to their dominant asset class and expected market potential.

- Unsecured markets: Norway, Sweden, Denmark, Finland, Estonia, Latvia, Lithuania, Poland, Spain, Czech Republic, Hungary
- Secured markets: Italy, France, Romania, Greece, Cyprus, Slovenia, Croatia, Serbia, Bosnia and Herzegovina, Montenegro
- Offices: Norway, Head office in Oslo, Luxembourg, Investment office and portfolio owner

B2Holding ASA and its subsidiaries have a valuable reputation as a solution-oriented and trustworthy player within the debt collection industry. Honesty and fairness are fundamental principles in B2Holding’s way of doing business and it is recognized for respecting its customers and business partners.

B2Holding is committed to ensuring respect for the inherent dignity of people and their inalienable rights as a fundamental part of its corporate responsibility, and as an essential requirement for conducting its business activities in any country or social environment.

B2Holding’s Code of Conduct supports these fundamental principles and is committed to respecting labour and human rights, as emphasized its participation in the UN Global Compact, and by acting in accordance with the Ten Principles set forth therein. More concretely, our approach is based on several frameworks that define human rights principles for businesses, such us:

- UN Guiding Principles on Business and Human Rights
- OECD Guidelines Due Diligence
- The UN Global Compact’s Ten Principles

We have identified potential salient human rights to our operations and which we are most at risk of impacting:

1 VULNERABLE PEOPLE	2 DATA SECURITY AND PRIVACY	3 STAKEHOLDER ENGAGEMENT	4 LABOUR RIGHTS	5 ACCESS TO REMEDY
<ul style="list-style-type: none"> • Fair treatment and satisfaction of debtors as a B2H material topic • Includes people in vulnerable situations • Extra vigilance, respect and dignity • Not buying from and collecting for companies who set high interest rates for vulnerable groups 	<ul style="list-style-type: none"> • Private life and private communications will remain secret • Information about the finances of customers • Proper safeguards • Policies aligned with the GDPR • Training provided • Data breaches monitored 	<ul style="list-style-type: none"> • Mechanisms to allow customers to express opinion and assess their level of satisfaction • How to improve the relationship with customers and develop associated plans • Effective stakeholder engagement • Allowing customers to communicate any concerns 	<ul style="list-style-type: none"> • B2H as a signatory to the UN Global compact, committed to its 10 principles • Publish information about labour rights and decent working conditions • Such us: freedom of association, discrimination, forced and child labor... 	<ul style="list-style-type: none"> • Develop a mechanism that can provide remedy for breaches of B2H’s procedures and for breaches of human rights commitments • Remedy any adverse effects of B2H’s operations

B2Holding's Human rights management

Managing and improving our human rights impact is an ongoing process. For further information you may also refer to our Labour and Human rights statement and our Annual Report 2022 (pages 34-36), both available in our website.

Policy commitment and governance

The Norwegian Transparency Act establishes legal requirements for larger enterprises' duty to report on the work they do to ensure compliance with fundamental human rights and decent working conditions in the enterprises themselves, in their supply chains and with their business partners. In addition, there is also a duty to report on the assessments made to ensure that stakeholders have access to the information. The Act is based on the UN's Guiding Principles on Business and Human Rights (UNGP) and the OECD's guidelines for responsible business conduct. B2Holding is working on a company-wide approach to human rights due diligence integrated into our governance structure.

- B2Holding's Labour and Human Rights Statement was approved in 2021. It is reviewed on a yearly basis by the Group's Chief Brand and Sustainability Officer. It outlines the labour and human rights recognized by B2Holding to its employees irrespective of their role and the country in which they work, to its customers, and to the local communities where the Group operates.
- Honesty and fairness are fundamental principles in B2Holding's way of doing business in the debt collection industry and it is recognized for respecting its customers and business partners. B2Holding's Code of Conduct supports these fundamental principles and is the Group foundation for building and sustaining professional and long-term relations with its Stakeholders and maintaining high ethical standards in every decision made.
- Furthermore, B2Holding has developed a Business partner Code of conduct approved by the Board of Directors. It outlines the ethical standards, principles, and behaviours. B2Holding expects from its business partners when conducting business with or on behalf of B2Holding. This code is available to all business partners, and we expect our suppliers to comply with and promote the same principles in their own supply chain.
- In relation to our business partners and supply chain, B2Holding has developed a Business Partner Integrity Due Diligence Policy approved by the Board of Directors in 2022, that outlines how business units can perform a due diligence in order to obtain background information about business partners from various information sources, e.g. information provided by the business partner itself, databases, publicly available information. The policy aims to set out the minimum standards and steps which must be taken to identify, assess, mitigate, and monitor risks, as well as reach informed decisions as to whether or not to enter into a business relationship. The majority of our business partners are banks and financial entities highly regulated in all countries where we are present.
- We communicate our performance in our Annual report (pages 41-42 in our GRI Index).

B2Holding's Employees

B2Holding respects the fundamental human rights to all employees and has zero tolerance towards:

- Any form of discrimination based on race, gender, language, ethnicity, religion, political opinion, nationality or social origin, age, disability, or any other characteristic
- Harassment or violence of any kind
- Discriminatory behaviour in the employment-related decisions from hiring to termination that are based on illegal or discriminatory criteria

Identified as one of our salient issues (labour rights), B2Holding strives to maintain an inclusive work culture in which each employee feels respected and valued and has the opportunity to develop and grow in line with business needs and personal aspirations.

B2Holding respects employees' freedom of association and their right to collective bargaining agreements, as well as the right to form, join, or not join a trade union, or other organization of their choice, in accordance with the ILO Convention 87 on freedom of association and protection of the right to organize and ILO Convention 98 on the right to organize and collective bargaining. B2Holding is committed, as a minimum, to comply with national laws as well as industry standards in the event of collective redundancies.

B2Holding complies with the applicable laws, regulations, and industry standards in relation to minimum wages, overtime, benefits and working hours in all countries where the Group operates.

B2Holding's Customers

B2Holding is committed to safeguarding the human rights of its customers by:

- Providing services that are respectful with their human rights and information is accurate and truthful
- Operating in compliance with all applicable laws
- Ensuring the right of privacy, diligent and appropriate use of personal data, in accordance with B2Holding policies and procedures. Identified as salient issue access to remedy.
- Carrying out ethical and responsible collections which follow group-wide principles
- Respecting the rights of the local communities in the countries the Group operates

Managing and improving our human rights impact is an ongoing process. You can find more information about B2Holding's human rights management in B2Holding's Human Rights Statement and on our [webpage](#).

We are continuously working to mitigate our potential risks. We welcome dialogue and encourage you to contact us if you would like to discuss further.

B2Holding is currently developing a Human Rights policy that shall be approved by the Board of Directors. The mentioned policy will be in line with the already mentioned Code of Conduct and Human Rights Statements and their main principles. Respecting human rights is part of B2Holding's [Code of Conduct](#), which we expect all our employees to comply with.

Due diligence: Identifying, assessing, acting, monitoring, and communicating impact

To help facilitate informed and effective participation by people who are potentially affected by our operations, we establish or facilitate access to effective grievance mechanisms where relevant. We encourage, and will not retaliate against, individuals who in good faith raise concerns regarding B2Holding's respect for human rights. A company whistleblower channel for reporting concerns involving illegal, unethical, or unwanted behaviour is available, on an identified or anonymous basis, for employees and on-site contractors. In countries with higher risks for adverse human rights impact to communities according to our risk-based approach, we aim to have local community-based grievance mechanisms.

We have initiated a process of conducting a gap analysis of our approach to human rights due diligence to identify potential areas for improvements.

We recognize the importance of working collaboratively across our industry to promote the respect for, and fulfilment of, human rights. Several policies and membership in organizations in which B2Holding is taking part are detailed in pages 43 and 44 of our Annual Report 2022, already published in our website.

In B2Holding has a publicly available communication channel in relation to human rights for any information requests on to how we manage human rights (humanrights@b2holding.no).

The Board of Directors 26 June 2023

/sign/ Harald L. Thorstein Chair of the Board	/sign/ Trond Kristian Andreassen Board Member	/sign/ Jessica Sparrfeldt Board Member
/sign/ Kjetil Garstad Board Member	/sign/ Trygve Lauvdal Board Member	/sign/ Adele B. Norman Pran Board Member
/sign/ Grethe Wittenberg Meier Board Member	/sign/ Erik J. Johnsen Chief Executive Officer	