

POLICY ON BUSINESS DEVELOPMENT

1 INTRODUCTION

This document sets out NCR's Policy on business development, which describes NCR's business activities (the "Policy"). The Policy addresses the management of current products, development of new markets, products and services, and significant changes to existing ones ("new business development"), as well as the process for approving exceptional transactions at NCR.

For defined terms used in this Policy, please see the NCR Defined Terms Glossary made available on the NCR website and intranet.

This Policy is approved by the Board of Directors.

2 APPLICABILITY

This Policy applies to Commercial Employees of NCR.

The contents of this Policy and any future updates are published and made available on NCR's intranet. The Policy will be reviewed and updated, when necessary, but at least annually.

3 GENERAL PRINCIPLES

As a regulated Credit Rating Agency, NCR's core business is to assign Credit Ratings primarily, but not exclusively, on entities based in the Nordic countries (i.e. Denmark, Finland, Iceland, Norway, and Sweden). To cover its costs, NCR signs commercial contracts to provide Credit Ratings with clients and charges a fee for its services.

Fees charged for Credit Rating services should be cost-based and must not depend on the level of the Credit Rating issued by NCR or on any other result or outcome of the work performed.

NCR also provides select Ancillary Services and Other Services, which are mainly credit-related analytical products and are not Credit Ratings.

A full description of NCR's approved products and services can be found in section 7 of this Policy. Additional products must be approved in accordance with section 4 below.

4 NEW BUSINESS DEVELOPMENT

New business development includes establishing new analytical areas that would require new methodology development, amending the commercial model, or adding new Ancillary Services.

The procedure for the development of new products and services entails the following steps:

1. The Commercial Function assesses the potential business case of bringing a new product or service to the market.
2. A new business development (NBD) form is completed by a Commercial Employee with inputs from relevant internal functions. The NBD form should address issues relating to regulatory compliance, pricing models, the impact on NCR's risk profile, staffing levels, IT resources, and the availability of internal tools and expertise to assess and monitor the associated risks.
3. The commercial steering group approves or rejects the NBD form. The commercial steering group should include the CEO and the Compliance Function.

4. The NBD form is presented to the Board of Directors who approves or rejects the proposal.
5. If approved, the process for developing the new product or service commences. Any material deviations from the approved NBD form during implementation must be re-approved by the Board of Directors.

5 EXCEPTIONAL TRANSACTIONS

Exceptional transactions include commercial activities which are outside of NCR's ordinary business activities but do not consist of new products and services or significant changes to existing ones. For example, an Issuer based outside of the Nordic countries who would like a Credit Rating from NCR to attract Nordic investors.

The procedure for approving exceptional transactions entails the following steps:

1. The Commercial Function assesses if the exceptional transaction is feasible or not.
2. An exceptional transaction form (ET) form is completed by a Commercial Employee with inputs from relevant internal functions (see section 6 for further clarification). The ET form should address issues relating to regulatory compliance, pricing models, the impact on risk profile, the availability of analytical skills and resources, and the availability of internal tools and expertise to understand and monitor the associated risks.
3. The commercial steering group approves or rejects the ET form. The commercial steering group should include the CEO and the Compliance Function.
4. The ET form is presented to the Board of Directors who approves or rejects the proposal. The supporting material and decision should be saved electronically.
5. If approved, the process for conducting the exceptional transaction can begin.

6 ROLES AND RESPONSIBILITIES

The origination of new business and development of new business activities are always managed by Commercial Employees. Analytical Employees may participate in giving inputs to the NBD or ET form during the process, primarily from a resourcing and competency perspective, but can never participate in any commercial considerations.

7 PRODUCTS AND SERVICES

NCR provides Credit Rating Services, Ancillary Services, and Other Services. See definitions in "Terms and Definitions" published on NCR's intranet and website.

Type of service	Service name	Description
Credit Rating	Issuer Credit Rating	NCR's assessment of an Issuer's overall capacity to meet its debt obligations. The Rating is monitored and can be public, private, confidential, or preliminary.
Credit Rating	Instrument (Issue) Credit Rating	NCR's assessment of the credit quality of a specific debt instrument. The Rating is monitored and can be public, private, confidential, or preliminary.
Ancillary service	Credit Assessment	A confidential, point-in-time indicator of the credit quality of an entity or instrument expressed on NCR's Rating scale but using lower-case letters (e.g. 'bbb+'). Typically delivered on a portfolio of entities or instruments.
Ancillary service	Credit View	A Credit Assessment with a brief analytical rationale behind the assessment. Typically delivered on a portfolio of entities or instruments.
Ancillary service	Data Licensing	A data feed with the latest up-to-date Rating data published by NCR for internal use by the subscriber.
Ancillary service	Private Credit Analysis	A Credit Assessment with an in-depth report outlining the rationale behind the assessment. It is generally confidential but can be shared with third parties on a limited basis.
Ancillary service	Rating evaluation service (RES)	A point-in-time confidential indicative Credit Rating to assess the credit effect for one (existing Issuers only) or several pre-defined scenarios.
Other service	Credit Training	Training events led by NCR staff on topical developments in credit markets, Credit Rating fundamentals, Rating methodologies, and credit analysis of different sectors.

8 DOCUMENT INFORMATION, VERSION HISTORY AND DISTRIBUTION

8.1 Document information

DOCUMENT STATUS

Version	1.6
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Status	Effective 2024-12-16
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Adopted by:	Board of Directors
Adopted on:	2024-12-04
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8.2 Version history

#	AUTHOR	ROLE	APPROVED	DATE	COMMENT
1.0	CEO	Author	Board of Directors	2020-12-03	Initial document
1.1	Compliance	Review	Board of Directors	2021-06-07	Reviewed. No changes.
1.2	Compliance	Review	Board of Directors	2022-05-31	Editorial changes.
1.3	Compliance	Review	Board of Directors	2023-04-20	Editorial changes.
1.4	Compliance	Review	Board of Directors	2023-11-03	Editorial changes.
1.5	Compliance	Review	Board of Directors	2024-06-07	Editorial changes.
1.6	CEO	Amendment	Board of Directors	2024-12-04	Minor updates and editorial changes. List of services now included here.

8.3 Distribution and access

ROLE	NAME	E-MAIL
	All Employees	