Nordic
Credit
Rating

POLICY ON SUSTAINABILITY

1 INTRODUCTION

This document sets out the overarching principles of Nordic Credit Rating AS's ("NCR") approach to sustainability, including its management and governance (the "Policy").

NCR is committed to being a sustainable and responsible organisation. This Policy establishes sustainability as a core value and guides NCR's efforts to contribute to a sustainable future for the company, its Employees, clients, and the societies in which it operates.

By integrating sustainability into NCR's daily operations and into the products and services it provides, NCR aims to:

- Support a more sustainable future for stakeholders and markets;
- Foster an inclusive and resilient workplace; and
- Strengthen the adaptability and long-term resilience of NCR's business model.

NCR’s approach to sustainability also reflects regulatory expectations, including the EU Credit Rating Agencies Regulation (CRAR), ESMA’s guidance on environmental, social, and governance (ESG) disclosure, and the Digital Operational Resilience Act (DORA). These frameworks emphasise transparency, operational resilience, and the integration of ESG considerations into risk management and decision-making.

Defined terms used in this Policy are in NCR's *Definitions of Terms*, available on NCR's website and intranet.

2 APPLICABILITY

The Policy applies to all Employees, Senior Management, and Board Members of NCR.

The contents of this Policy, including any updates or amendments, are published on NCR's intranet and made available to all relevant persons. The Policy shall be reviewed and updated as necessary, but at least annually.

For matters related to compliance with this Policy, including the reporting of material breaches to ESMA, refer to the procedures regarding the Compliance Function set out in the *Policy on Organisation of Material Functions*.

3 OVERVIEW

NCR addresses sustainability across multiple dimensions and stakeholder groups. The purpose of this Policy is to provide a governing framework for integrating sustainability into NCR's vision, business objectives, and daily operations. It defines what sustainability means for NCR and clarifies NCR’s role in promoting sustainable practices across the organisation.

NCR's mission is to contribute to economic growth in the Nordic region. We believe that independent and objective Credit Ratings enhance efficiency and transparency in financial markets, thereby lowering transaction costs for both borrowers and investors. More efficient financial markets enable a broader range of entities to access funding beyond the banking system. This supports investments in growth projects that create jobs, strengthen competitiveness, and contribute to wider sustainability objectives, including the transition to a low-carbon economy and the fight against climate change.

4 SUSTAINABILITY MANAGEMENT AND MODEL

4.1 Governance model

NCR's governance model ensures that the organisation can meet regulatory commitments, deliver on its core business and strategic objectives, and empower Employees and Board Members to make informed decisions that support a sustainable future.

Sustainability management at NCR is built on a framework of governance documents, clearly defined roles and responsibilities, internal controls, Credit Rating Methodologies, position statements, and the integration of sustainability principles into NCR's corporate culture.

The Board of Directors holds ultimate responsibility for NCR’s sustainability management. The Board shall remain actively engaged in sustainability matters and receive regular updates on related activities and progress.

The CEO is responsible for implementing the strategic direction set by the Board, including that sustainability objectives are embedded in NCR's operations and contribute to achieving the organisation's vision and goals.

4.1.1 Three lines of defence model

NCR’s risk and sustainability management is built on the three lines of defence model, which clearly defines roles and responsibilities for risk ownership, oversight, and assurance. This model ensures effective governance, accountability, and transparency in how risks are identified, managed, and monitored across the organisation.

4.1.2 First line of defence

The first line of defence consists of the business units and group functions that hold primary responsibility for the continuous and active management of risks within their respective areas. They are accountable for ensuring that appropriate processes and internal control structures are in place so that risks are:

- Identified,
- Assessed,
- Managed,
- Monitored,
- Reported, and
- Maintained within the boundaries of NCR's risk appetite and risk management framework.

4.1.3 Second line of defence

The second line of defence consists of NCR's independent control functions, primarily the Compliance and Risk Function. This Function is responsible for maintaining and overseeing the risk management framework, ensuring that all material risks to which NCR is exposed are appropriately identified, assessed, managed, and reported.

The second line of defence validates and challenges the risk management activities carried out by the first line of defence, and monitors whether effective processes and controls are in place across the organisation.

The Compliance and Risk Function operates independently from business operations and reports administratively to the CEO and functionally to the Board of Directors.

4.1.4 Third line of defence

The third line of defence consists of the Internal Audit Function, which is outsourced to an independent third party appointed by and reporting directly to the Board of Directors. Internal Audit is independent from NCR's executive management and operational activities.

The Internal Audit Function provides independent assurance to the Board on selected areas of NCR's governance, risk management, and internal control framework. Reviews are performed periodically, typically through targeted thematic assessments agreed in advance with the Board and are designed to identify improvements and support the ongoing strengthening of NCR's control environment.

5 SUSTAINABILITY (ESG) FACTORS IN CREDIT RATINGS

NCR shall analyse and transparently disclose how an Issuer's creditworthiness may be affected by environmental, social, and governance (ESG) factors, including both risks and opportunities. This approach helps investors make informed investment decisions. NCR's Credit Rating methodologies, analysis, and disclosures shall explicitly consider ESG factors, where relevant, to ensure that users can trace how such considerations have been incorporated into Credit Ratings.

NCR applies the principle of materiality when assessing ESG factors, in the same way as for all other Credit Rating factors. ESG risks and opportunities are incorporated when they have a material impact on an Issuer's or Issue's creditworthiness and NCR has sufficient visibility and analytical certainty to include them in the credit assessment.

To support transparency, NCR maintains a publicly available *Statement on ESG in credit risk and ratings*, which explains NCR's commitments and principles for integrating and disclosing ESG factors in its Credit Ratings.

6 SUSTAINABILITY IN NCR'S OPERATIONS

NCR strives to be an attractive and inclusive employer, regardless of gender, background, age, ethnicity, or beliefs. By embracing diversity, NCR ensures its Employees and the organisation are better positioned to achieve their full potential.

NCR is committed to promoting a healthy and safe workplace where Employees can collaborate effectively, free from risks of illness or injury caused by their work, while also having opportunities to grow and develop as individuals.

NCR seeks to contribute positively to the communities in which it operates. The company shall conduct its activities in a manner that minimises adverse impacts on people, the environment, and property, and, at a minimum, complies with all applicable regulatory requirements.

NCR shall strive to increase resource efficiency and minimise its carbon footprint in its own operations. NCR's Employees are encouraged to make environmentally conscious choices in their work, including adopting low-carbon travel and transportation options when possible and feasible.

Executive management shall periodically review the company's environmental objectives and targets, and, where feasible, seek opportunities to further reduce its environmental and climate impact over time.

7 OTHER SUSTAINABILITY INITIATIVES

7.1 Annual charity donation

Each December, NCR makes an annual charitable donation. Employees are invited to select from a range of charitable organisations, ensuring that contributions reflect shared values and diverse causes.

7.2 Commercial development of ESG products

While NCR does not currently offer ESG products, the company actively monitors developments in ESG-related offerings by other Credit Rating Agencies and ESG rating providers. NCR also tracks changes in the regulatory environment and engages with the market to assess the demand and potential relevance of ESG products.

7.3 Diversity, equity, and inclusion

Promoting diversity, equity, and inclusion (DEI) is a priority for NCR in creating a workplace free from discrimination and bias. NCR seeks to achieve this by ensuring objective and transparent hiring processes, maintaining fair employment practices, and raising awareness through DEI-focused initiatives.

7.4 Learning opportunities

NCR is committed to supporting the personal and professional development of its Employees. To foster growth and ensure Employees can thrive in their roles, NCR continuously develops and promotes participation in training and development programmes. These may include technical training, leadership development, and awareness initiatives related to sustainability—such as the CESGA program.

7.5 Office environment

NCR works in collaboration with its landlords, who are committed to ambitious environmental and sustainability objectives to reduce energy consumption in its offices. Internally, NCR promotes a paperless working environment and minimizes waste through recycling and reduction practices. NCR also seeks to reduce its digital carbon footprint by selecting data centres and cloud providers with power usage effectiveness (PUE) better than industry average. Where feasible, NCR shall explore ways to monitor the environmental impact of its IT services to support continuous improvement.

7.6 Partners and suppliers

To foster partnerships and supplier relationships that align with NCR's commitment to sustainability and ethical business practices, NCR seeks to collaborate with partners and suppliers who demonstrate a commitment to sustainable practices and share NCR's vision for a more sustainable future.

7.7 Travel

NCR recognizes that business travel contributes to its environmental footprint and therefore strives to make sustainable travel choices whenever possible and practical. NCR promotes the use of digital meetings as a first option, and, when travel is required, encourages the use of public transportation, carpooling, or eco-friendly vehicles for commuting and client visits.

Employees and Board Members are encouraged to consider the environmental impact before booking a trip. Short-haul taxi journeys, for example within Stockholm or Oslo, should be avoided when practical public transportation alternatives are available.

7.8 Employee well-being

NCR prioritises the health and well-being of its Employees by fostering a supportive workplace culture that promotes a sustainable work-life balance. Efficiency in operations and the reduction of unnecessary or redundant tasks are key elements of NCR's strategic approach, helping Employees focus on value-adding activities and maintain a healthy balance between professional and personal responsibilities.

8 DOCUMENT INFORMATION, VERSION HISTORY, AND DISTRIBUTION

8.1 Document information

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Document owner	Compliance Function
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8.2 Version history

#	AUTHOR	ROLE	APPROVED	DATE	COMMENT
1.0	Chief Executive Officer	Author	Board of Directors	2025-02-19	New Policy
1.1	Compliance	Review	Board of Directors	2025-09-08	Editorial updates
2026.1	Compliance	Review	Board of Directors	2026-07-01	Annual review, no changes.

8.3 Distribution and access

ROLE	NAME	E-MAIL
1.0	All Employees	