

# Transparency Act Report 2023

## About the Transparency Act

The purpose of the Norwegian Transparency Act is to promote enterprises' respect for human rights and decent working conditions in connection with the production of goods and the provision of services. The Act ensures the general public access to information concerning how enterprises address potential and actual impacts on fundamental human rights and decent working conditions and require companies to respond to incoming information requests<sup>1</sup>.

## Questions or concerns

For questions regarding this report or its content, please use the following email: [humanrights@b2-impact.com](mailto:humanrights@b2-impact.com). Inquiries will be handled on an ongoing basis, and within three weeks.

## About B2 Impact

B2 Impact is a leading pan-European debt investor and servicer. Through our business solutions, we contribute to handling society's debt problems, bridging gaps that defaulted debt represents in the credit chain. We aim to be a trusted partner and our vision is to become the debt investor that actively re-shapes the credit management industry. Our main business lines are Unsecured and Secured Asset Management. We are headquartered in Oslo, Norway, with an investment office in Luxembourg and operate in the following markets:

- 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

## Guidelines and routines

We are committed to act responsibly and ethically throughout our business operations. Our governing documents set out principles for how business should be conducted and the documents applies to all B2 Impact subsidiaries and units. Business partners and suppliers are in this document referred to as Business Partners.

## Code of Conduct

The Code of Conduct contains our main ethical guidelines and applies to everyone working in B2 Impact. The Code of Conduct was approved by the Board of Directors in June 2020 and was last updated in December 2022.

The Code of Conduct includes information about how to act in the workplace, towards our "Business Partners" and towards any third party impacted by B2 Impact's

business activities. The Code of Conduct also includes information about our approach to the environment and climate. In addition to outlining the principles for business conduct, the ethical guidelines also contain information regarding how we handle potential misconduct.

The Code of Conduct is communicated to all employees as part of the onboarding process and can be found on the company's website: [b2-impact.com/about-us/governance/code-of-conduct/](https://b2-impact.com/about-us/governance/code-of-conduct/)

## Business Partner Code of Conduct

We expect everyone affiliated with our business (vendors, clients, suppliers, investors and any other third party) to behave in an ethical manner and act with integrity, as outlined in our Business Partner Code of Conduct.

The Chief Risk, Compliance & ESG Officer is the owner of the Business Partner Code of Conduct and is responsible for reviewing, updating and/or revising the document, as appropriate.

The Business Partner Code of Conduct was approved by the Board of Directors in September 2021 and was last updated in September 2022. The document can be found on the company's website: [b2-impact.com/about-us/governance/code-of-conduct/business-partner-code-of-conduct/](https://b2-impact.com/about-us/governance/code-of-conduct/business-partner-code-of-conduct/)

## Labour and Human Rights Statement

We respect fundamental human rights, including workers' rights and decent working conditions. We have a zero tolerance for any form of discrimination, whether this is based on race, gender, language, ethnicity, religion, political opinion, nationality or social origin, age, disability, or any other characteristic. We also oppose harassment or violence of any kind.

1. [lovdata.no/dokument/NLE/lov/2021-06-18-99/%C2%A71#%C2%A71](https://lovdata.no/dokument/NLE/lov/2021-06-18-99/%C2%A71#%C2%A71)

Appendix

In addition to the Code of Conduct and the Business Partner Code of Conduct, B2 Impact has established a Labour and Human Rights Statement which applies to employees and Business Partners, irrespective of their role and the country in which they work.

The Labor and Human Rights Statement builds on the UN Guiding Principles on Business and Human Rights (UNGPs), as well as the OECD Guidelines for Multinational Enterprises. The document is available on B2 Impact’s website: [b2-impact.com/sustainability/human-rights](https://b2-impact.com/sustainability/human-rights)

**Whistleblowing Policy**

Everyone that becomes aware of illegal, unethical, or unwanted behaviour that is considered a breach of law or non-compliance with our Code of Conduct, Business Partner Code of Conduct or Labour and Human Rights Statement has a duty to report this.

Reporting can be made internally or through one of our external whistleblowing channels: [report.whistleb.com/en/b2-impact](https://report.whistleb.com/en/b2-impact)

The person reporting does not need to provide evidence to support the concern, but reports must be made in good faith and in the public interest. Within seven calendar days, the person reporting will receive a response or follow-up questions. Individuals that report shall not and will not be subject to retaliations.

**Due diligence of Business Partners and results**

Following our internal Group Business Partner Integrity Due Diligence Policy (internal document), all business units in B2 Impact shall perform a background compliance investigation of business partners (including suppliers) to identify, assess and mitigate potential risks before entering into a contract.

Risks are defined as a breach of regulatory requirements, B2 Impact’s Code of Conduct or the Labour and Human

Rights Statement. We will not enter into a contract with Business Partners if the cooperation involves a high integrity risk, if the Business Partner or any of its representatives are included on a sanctions list, are guilty of a criminal offense or if the Business Partner lacks the licences/ authorisations to perform the service. Additionally, the following examples will entail a red flag meaning that there are actual or potential unacceptable risks associated with the Business Partner:

- If the Business Partner objects to the due diligence process
- Denies disclosing reasonable requested information
- Engages in or has been accused of engaging in improper business practices
- Has incurred criminal or civil penalties for illegal or unethical conduct

An enhanced due diligence assessment will take place if there is a perceived risk associated with the Business Partner in question. In this process, the Business Partner has to complete a questionnaire about general compliance, including specific questions about human rights and decent working conditions.

Questions include whether the Business Partner has a policy in place regarding human rights and decent working conditions, what kind of measures the Business Partner takes to address adverse effects, prevent risks or remedy negative consequences, about wages, benefits and work conditions for its employees and measures implemented to ensure that they neither cause nor contribute to child labour, forced labour or discrimination.

No contracts with Business Partners were discontinued or terminated in 2023 due to human rights breaches or suspicion of human rights breaches. We did not receive any reports about human rights breaches through our

whistleblowing channel in 2023. There were no confirmed incidents of discrimination or harassment in 2023.

In 2023, there were seven incidents reported as whistleblowing cases. All cases have been handled. Amongst these seven reports, four were transferred to and processed by HR departments as they were assessed to be personal grievances rather than protected disclosures. One resulted unjustified after an internal investigation, and one was closed as the information provided did not allow for proper investigation. One case was still being investigated at the end of 2023.

KPI (GRI 406-1)	2023	2022	2021
Incidents reported as whistleblowing cases	7	2	10
Confirmed incidents of discrimination or harassment	0	0	1

**Going forward**

Going forward we will consider implementing a system for keeping track of the number of Business Partners assessed in the reporting period and the outcome of such evaluations. We will also consider a fixed interval for conducting due diligence assessments of existing suppliers, with at least one assessment per year. In 2024 we will communicate the updated Business Partner Code of Conduct to all existing suppliers.