Annex 1 - Statement on the annual due diligence assessments

Introduction

This statement includes a general description of the Riverty's organisational structure, area of operations, guidelines and procedures for handling actual and potential adverse impacts on fundamental human rights and decent working conditions.

Furthermore, this statement also includes information regarding actual adverse impacts and significant risks of adverse impacts that the Riverty has identified through its due diligence.

In addition this statement also entails information regarding measures that Riverty has implemented or plans to implement to cease actual adverse impacts or mitigate significant risks of adverse impacts, and the results or expected results of these measures.

This statement is updated and published no later than the 30th of June each year.

Our Statement on Transparency

With the Norwegian government implementing the Transparency Act on 1st of July 2022, Norwegian organisations are required to produce a due diligence statement each year. This statement sets out the steps we have taken to ensure that basic human rights and decent working conditions are an established part of our business and supply chain.

Riverty Group Norway AS / Riverty Norway AS / Riverty Services Norway AS, here after "Riverty" is a FinTech / Debt Collection company which employs 212 people in Norway and the European Union. Riverty is a wholly owned subsidiary of the German Bertelsmann Group, with the Group's parent company being Bertelsmann SE & Co KGaA.

Policies on human rights and decent working conditions

Riverty is strongly committed to meeting the Bertelsmann Code of Conduct to ensure that human rights are respected and decent working conditions are provided. To ensure this, we have provided a copy of the Bertelsmann Supplier Code of Conduct to all of our key suppliers and reinforced this for all suppliers by adding a Code of Conduct clause to the Riverty supplier terms and conditions. These additional requirements have been incorporated into our internal supplier review process. This ensures that every new or existing supplier complies with the provisions of the Bertelsmann Code of Conduct and thus the Norwegian Transparency Act. If these standards cannot be met, we will take reasonable steps to review the relationship and, if necessary, consider whether or not to continue the supplier relationship if the deficiencies cannot be corrected within a reasonable period of time. Furthermore, Bertelsmann has published a Declaration of Principles on the observance of human rights. This guideline explains a group-wide process for analysing supply chain risks related to human rights, labour rights and environmental risks. Riverty has also implemented these processes and is working on constantly improving them.

Employee Training

Employees are required to comply with the Code of Conduct and in 2016 Bertelsmann initiated mandatory Code of Conduct trainings throughout the company to clarify its expectation that good employment practices will be followed. Each year, employees are required to participate in this e-learning course and all other mandatory courses that are required to enable employees to do their work. New starters will be briefed on this statement to ensure their awareness. Employees are expected to report any concerns, including those related to human rights violations, to the Ethics and Compliance team who will investigate all allegations and take appropriate action.

Due Diligence

We regularly conduct risk assessments to identify adverse impacts and risks to people associated with our business. In 2025, we have not identified any actual negative impacts.

As part of our due diligence process, we have assessed risks to both our own business and our supply chain.

Significant risk areas in the supply chain

Riverty's supply chains mainly consist of organisations within Norway and the European Union, as we do not normally operate outside this area. We have a clear supply chain with few suppliers outside Norway and the European Union. Most of our suppliers are well known to us through established partnerships over an extended period of time.

Riverty aims to avoid contracting with suppliers or sub-contractors that are located in geographical areas where basic human rights and decent working conditions are more at risk of not being protected. We do however recognise that the broader supply chain, including indirect suppliers and subcontractors, may involve countries with a higher risk of weak protection of human rights and proper working conditions. To mitigate this, we have established processes to ensure that our suppliers carry forward this responsibility within their own supply chains.

To ensure this, Bertelsmann has in place a Supplier Code of Conduct which was updated in 2023. This means our expectations regarding the treatment and rights of individuals within the supply chain are clearly articulated to our supply base. A copy of the current code of conduct is set out here.

Additional requirements have been added to our internal supplier review process to ensure that, whenever possible any new or existing supplier confirms compliance with the provisions of the Norwegian Transparency Act.

If suppliers do not confirm compliance, we will take reasonable steps to review the relationship and may consider whether or not it should maintain the supplier relationship.

Since 2022, Riverty took steps to identify those suppliers which potentially pose a higher risk of poor human rights and labour practices, perhaps due to the nature of the goods or services being provided. Where it was thought necessary, further investigation was undertaken in respect of those suppliers identified. Steps were taken to obtain more assurance for higher risk suppliers that their practices are compliant with the Norwegian Transparency Act. This included statement and policy reviews, questionnaires and further meetings with the supplier when appropriate. The results of these supplier assessments have been recorded and are refreshed periodically. This activity has confirmed that Riverty has a low risk of using or being part of supply chains that do not respect human rights and decent working conditions. For 2025 the risk of violations related to human rights and decent working conditions in the supply chain for our products and services was assessed to be on a low level.

Any suppliers with an increased risk will continue to be monitored on a regular basis. This will include a review of the steps that each supplier is taking to comply with current supply chain legislation to give assurance to Riverty that the supplier is meeting the required standard.

Responsibility

The Country Lead / Managing Director takes responsibility for ensuring that this Statement is consistent with Riverty's ethical and legal obligations. It is the responsibility of the Board of Directors for their own operational and professional areas to ensure that standards are maintained and that appropriate action is taken to address any concerns or breaches of this statement.

This statement is reviewed annually to confirm that basic human rights and decent working conditions are not violated within our operations or supply chains.

Signature of Country Lead / Managing Director

Oslo

Kjell-Rune Birkelund

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