



Consolidated Transparency Act Due
Diligence Statement — AK Nordic NUF,
PRA Group Europe AS and PRA Group
Norge AS

Background

This is PRA Group's Norwegian Transparency Act (NTA) Statement covering the financial year 2025. This statement has been jointly published by all companies in the PRA Group with obligations under the Norwegian Transparency Act.¹

About PRA Group

The PRA Group is a global financial and business services company with operations in Americas, Europe, and Australia. The core operation specializes in acquiring and collecting nonperforming loans, which we purchase in the event that either the credit originators and/or other third-party collection agencies have been unsuccessful in collecting the full balance owed.

About AK Nordic NUF

AK Nordic AB is licensed as a Swedish credit market company and operates in Norway through its branch, AK Nordic NUF. The business is the acquisition and management of portfolios of receivables in the non-performing loan market. Large parts of AK Nordic's Norwegian operational activities are contractually assigned to group entities, primarily PRA Group Norge AS and PRA Group Europe AS. AK Nordic AB is supervised by the Swedish Financial Supervisory Authority.

About PRA Group Norge AS

PRA Group Norge AS conducts licensed debt collection activities on behalf of AK Nordic AB, collecting on debt portfolios that AK Nordic AB has acquired from banks and other financial institutions. The company emphasises constructive engagement with debtors to help them regain financial control. PRA Group Norge AS is supervised by the Norwegian Financial Supervisory Authority and operates in accordance with applicable Norwegian legislation and industry standards. Certain support functions, including HR and IT, are outsourced to PRA Group Europe AS under intragroup arrangements with aligned controls.

¹ AK Nordic NUF (reg.no. 987710128), PRA Group Europe AS (reg.no. 960545397), PRA Group Norge AS (reg.no. 995262584)

About PRA Group Europe AS

PRA Group Europe AS is a Norwegian company that provides shared services to group entities in Europe, including acquisitions support, analytics, finance, accounting, IT, legal and HR. The company operates under Norwegian law and within the group's common governance framework.

Our policies and routines

PRA Group is committed to the highest standards of ethical behavior, individual integrity and professional conduct.

As part of the same group, the companies share a common set of values anchored in PRA Group's Code of Conduct and supported by internal policies and procedures.

Implementation of the Transparency Act and allocation of responsibilities within each company are addressed through internal training, cross-functional collaboration, and dedicated governance meetings. Compliance obligations have been formally anchored through board resolutions, whereby each board has committed to ensuring that its entity meets the Act's requirements.

To safeguard decent working conditions, all three entities have established whistleblowing channels for employees. Appropriate policies are also in place covering employee welfare and the working environment. As Norwegian entities, they are subject to and governed by the Norwegian Working Environment Act.

With respect to other rights protected under the Act, all employees are required to complete annual Code of Conduct training to maintain awareness and understanding of the Group's ethical standards.

In their interactions with third parties and vendors, PRA Group companies comply with applicable laws and regulations. The entities have implemented policies governing engagements with external parties, and procurement practices prioritise the acquisition of high-quality services while maintaining strict adherence to compliance and ethical standards. As part of managing external risks, each new vendor undergoes a risk assessment conducted by the Vendor Risk Assessment team.

2025 approach and findings

Our 2025 due diligence combined desk-based research on sectoral and geographic risk indicators, internal consultations with relevant functions, and reviews of vendor and

outsourcing arrangements. The approach was proportionate to our size, sector and operating context, and consistent with the methodology applied in the prior year.

The most salient theoretical risk continues to relate to outsourcing. Outsourcing can place execution further from the individuals with direct responsibility for human rights and decent working conditions. This risk is mitigated by the Group's shared governance framework, structured onboarding and oversight of service providers, and the Companies' visibility into intragroup performance.

Based on our 2025 due diligence activities, the Companies did not identify any actual adverse impacts on fundamental human rights or decent working conditions in our own operations or supply chain. The Companies also did not identify significant risks of such adverse impacts that would necessitate additional preventive or mitigating measures beyond those already embedded in our governance framework, policies and vendor management processes.

2026 approach and expected results

The overall assessment is that there is a low risk of adverse impacts on fundamental human rights and decent working conditions within the industry in which the Companies operate.

In the coming year, the Companies intend to:

- Continue to apply, and, if possible, develop, existing procedures, policy and due diligence processes with new vendors, and;
- Continue, and, if possible, develop, employee training on human rights and decent working conditions.

The expected results of these measures include enhanced awareness among employees, strengthened oversight of external business relationships, and improved capacity to identify and respond to emerging risks relating to human rights and decent working conditions. The Companies expect that these efforts will result in more effective identification and management of human rights issues.