

Statement under the Transparency Act on fundamental human rights and decent working conditions - Lendo AS

1. Trust and transparency

At Lendo we believe in a market built on trust and transparency. Lendo's purpose is to provide consumers with the opportunity to make informed financial decisions that actually make a difference in their lives. Being aware of the impact Lendo has on society, the economy and the environment is an essential part of the sustainability agenda in Lendo. To make positive contributions to the environment and society as a whole is a fundamental pillar of our future value creation. The purpose of this report is to communicate Lendo's process for due diligence assessments, our findings and how Lendo will work to promote human rights and ensure decent working conditions in the value chain.

2. About Lendo

Lendo is a wholly-owned subsidiary of Schibsted, which offers marketplaces for price comparison of financial products such as consumer loans, business loans, credit cards, home loans and car loans. Lendo was founded in Sweden in 2007, when few players offered price comparison for consumer loans without affecting customers' credit scores. Then the credit rating system worked differently and lenders on the market offered very little openness. Together with a few selected banks and the Swedish credit rating agency Lendo innovated the market by enabling users to receive tangible offers from lenders through our comparison page based on only one credit check. This resulted in better offers to borrowers and a more transparent market. Today, we are an established company and a market-leading marketplace for loans in Scandinavia. We are still looking at us even as challengers and innovators, and this is of course reflected in our corporate culture.

Today, we operate in Norway, Sweden and Denmark. Lendo has always focused on helping people with keeping control of their personal finances and lenders finding quality customers. As a leader in our category, we've made it easier for consumers to get a fair price on loans, and often reduced interest rates significantly. We believe in a market built on trust and transparency. That is why we strive for transparency between our customers and partners.

Lendo Group's head office is located in Oslo and the legal name of Lendo Group is Lendo AS. As Lendo Group is wholly owned by Schibsted, there are additional information in the report on fundamental human rights and decent working conditions at group level in [Schibsted's Transparency Act Report](#).

3. Policies and procedures

Everyone at Lendo has a responsibility to uphold Lendo's reputation and principles. Since Lendo is a wholly-owned subsidiary of Schibsted, and we also have a responsibility to maintain Schibsted's reputation and principles. Through the way we interact with each other, meet our customers and relate to our business partners, we build and strengthen our

Lendo reputation as a group. Schibsted's Code of Conduct outlines our principles standards for conducting business and serves as our main ethical and sustainability policy. It includes principles of human rights, labour rights, business ethics, equal opportunities, anti-discrimination, child and forced labour, anti-corruption and environmental protection. Lendo has no company-specific ethical guidelines, but complements Schibsted's ethical guidelines policies with relevant training of employees that include anti-corruption in order to Mention one thing. More information about Schibsted's Code of Conduct can be found in Schibsted's annual sustainability report.

Schibsted's Code of Conduct is available to all employees on our intranet, Schibsted Buzz, and training is provided when deemed necessary. On the intranet there is also a link to Speak up Channel that enables anonymous reporting of censurable conditions, including violations of fundamental human rights and decent working conditions.

4. Due diligence at Lendo

Lendo has carried out due diligence assessments at company level, in addition to the work carried out at group level by Schibsted. The work is based on the OECD's guide for due diligence for responsible business conduct. Responsibility for Lendos Due diligence is divided between the sustainability function and the compliance function in the Reading Group. Lendo has provided input to the overall risk assessment carried out by Schibsted. With based on this risk assessment, Lendo has made an adjustment to its own Activity.

Lendo has identified and prioritised human rights risks that are relevant to our business and value chain. We have assessed our priority areas based on severity and the likelihood of potential adverse effects.

The main risk areas are:

- Privacy-related risks associated with marketing services
- Handling of personal data
- Labour and trade union rights
- Discrimination and harassment

The risk assessment carried out in Lendo involved employees with insight into Lendo's business, business partners, supply chain, and marketing.

Prioritisation was based on criteria including the severity of potential influences, the likelihood of the risk occurring and the extent to which Schibsted ASA and/or Lendo may contribute to or increase the identified risk.

The assessment we have carried out has not identified actual negative consequences or significant risk of negative impact on human rights. The risk assessment pointed to areas Lendo will prioritise in its ongoing work under the Transparency Act:

- Handling of personal data
- Privacy-related risks associated with marketing services
- General risks in the technology sector related to work and trade union rights, as well as discrimination and harassment.

- Follow-up of the value chain in terms of compliance with human rights and decent working conditions

5. Measures and areas for improvement

In several of the identified risk areas, Lendo has well-established systems and routines for to prevent any negative consequences. For example, Lendo does a comprehensive efforts to ensure that we process data in accordance with applicable privacy regulations; and users' expectations, through Lendo's privacy program that ensures compliance with GDPR. Lendo's long-term ambition in privacy is to ensure that we always respect and prioritise privacy and secure knowledge among employees, and key functions within the organisation. To support this ambition, one of Lendo's key objectives is to set the best standards for measuring privacy and data protection and follow up on these areas.

A key part of our business is the marketing of our services. Responsible Marketing is therefore essential to maintain satisfactory user trust and ensure integrity in the conduct of business. Lendo's long-term ambition is to promote and continue to be a forerunner for responsible marketing in the field of our industry in all markets.

As part of the Schibsted Group, Lendo uses a number of services that have been provided by Schibsted. For these services, Lendo relies on due diligence assessments and follow-up of suppliers carried out by Schibsted. For new partners, Lendo has prepared a questionnaire as part of the onboarding process with new partners. This helps to raise awareness and give us better insight into our supply chain. Furthermore, due diligence has been carried out by several major and central banking partners that are part of Lendo's value chain. More information about Lendo's work with sustainability, privacy and responsibility Marketing can be found in our sustainability report.

Oslo, June 24, 2024

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