

Fokus Nordic and the Norwegian Transparency Act

Fokus Nordic's Norwegian entities Fokus Nordic Norway Holding AS, Fokus Nordic Asset Management Norway AS and Fokus Fund Management Norway AS (AIFM) as well as property funds managed by the AIFM are subject to the Norwegian Transparency Act, which entered into force 1 July 2022. Social sustainability is embedded in Fokus Nordic's values and the way we work. We believe that a systematic and informed approach to identifying and managing ESG issues across a real estate portfolio will protect and can significantly enhance investment value.

The commitment to promote and respect fundamental human rights and decent working conditions in Fokus Nordic's supply chain is reinforced by the Code of Conduct, which applies to all employees and individuals working on behalf of Fokus Nordic's Norwegian entities.

Fokus Nordic's Norwegian entities are working systematically to meet the requirements under the Transparency Act. Human rights due diligence is a dynamic and continuous process.

As a first phase, the Norwegian entities will carry out an overall risk analysis of their operations and supply chain, including associated mapping and the development of a guidance document that will serve as their roadmap for ensuring compliance with the Act.

This work will form the basis for reporting on the Norwegian entities' due diligence assessments. The report will be published and made available annually on or before 30th June. Fokus Nordic's Norwegian entities will also respond to inquiries related to their operations and supply chain.

If you have any questions regarding Fokus Nordic's work under the Transparency Act, please submit a request to: Head of Risk and Compliance, Norway: Torbjørn Sætre on torbjorn.saetre@fokusnordic.com.

Please specify the request as clearly as possible. Fokus Nordic will respond within 3 weeks, or at the latest within 2 months, as permitted under the Norwegian Transparency Act (§7) in cases where the request is particularly extensive or complex.

In the link below, you can find Fokus Nordic's report on the Transparency Act 2025, covering the Norwegian entities. The report is only available in Norwegian:

[Fokus Nordic – Rapport om Åpenhetsloven 2025](#)

In the link below, you will find guidance on the Transparency Act from Fokus Nordic (formerly Deas Asset Management).

[Fokus Nordic \(formerly Deas Asset Management\) – Guide on the Transparency Act](#)