

Bigbank Sustainability Policy

(effective from 31 December 2025)

1. General provisions

- 1.1 Bigbank AS together with all branches and subsidiaries belonging to the same consolidated group (hereinafter Bigbank) has established the Sustainability Policy (hereinafter the Policy) and it is applied on a consolidated basis.
- 1.2 The Policy expresses our commitment beyond profit generation. The goal of the Policy is to create a framework for the governance of sustainable bank, enabling us to:
 - 1.2.1 clarify sustainability – define what sustainability means for Bigbank, and;
 - 1.2.2 formulate goals and commitments – clearly define our goals and commitments to ensure that we can measure progress and results.

2. Purpose of the Procedure

- 2.1 We have a responsibility towards society, the environment, and our customers, understanding the growing demand for sustainable development. Through our financial resources, employees, and customer base, we have the opportunity to promote economic growth, improve the quality of life for our customers, and support the transition to a more sustainable future.
- 2.2 Our aim is to provide financial services, which support sustainable development, promote responsible financial options, and contribute to the improvement of customers' quality of life.

3. Responsible Partnership and Customer Strategy

- 3.1 We refrain from establishing business relationships with customers who practice unethical business principles, including the mistreatment of people or animals, human rights violations, the use of child labor, or cause significant harm to the environment through excessive pollution.
- 3.2 We avoid establishing business or partnerships with potential customers or collaborators engaged in activities such as the production of fossil fuels, production of cigarettes or e-cigarettes, livestock farming that does not comply with the European Convention for the protection of animals kept for farming purposes, illegal logging, endangering the well-being of endangered plants and animals, practicing ecologically unsustainable fishing methods, or manufacturing or distributing weapons or weapon components prohibited by international law.

4. Principles and Sustainability

4.1 Environment

- 4.1.1 We minimize the environmental impact of our offices by following green office principles, including waste management in the workplace through waste reduction, recycling, and reuse.
- 4.1.2 We avoid greenwashing by adopting best practices in the field and connecting our sustainability initiatives with a scientific approach.
- 4.1.3 We ensure that our green products comply with the EU taxonomy, significantly contribute to mitigating or adapting to climate change, provide clear environmental benefits, and do no significant harm to other environmental objectives.

- 4.1.4 We ensure enhanced engagement with customers operating in sectors with elevated ESG risks- such as construction, real estate, transportation, agriculture, forestry and energy - to understand their transition strategies and encourage progress toward more sustainable practices.
- 4.1.5 We recognize that climate change introduces a range of risks, which are integrated into risk assessments through dedicated climate risk analysis. We consider climate- and wider ESG risks as risk drivers that may materialize through established risk categories.

4.2 Social Responsibility

- 4.2.1 We promote financial literacy, enabling consumers and businesses to make informed financial decisions in our areas of expertise.
- 4.2.2 We practice responsible lending principles to safeguard financial wellbeing and prevent adverse social impacts.
- 4.2.3 We contribute to sustainable regional development by making financial services more accessible to underserved customer segments, focusing on micro and small companies, large families and consumers and companies outside major cities.

4.3 Governance

- 4.3.1 We practice sustainable, responsible, and transparent management practices.
- 4.3.2 We ensure that our operations comply with applicable laws, and our reporting is transparent.
- 4.3.3 We implement effective risk management strategies to monitor risks associated with our operations effectively, protect the interests of customers and other stakeholders, and maintain the long-term stability of investments.
- 4.3.4 We are committed to creating a workplace where all employees are treated equally, with equal opportunities for growth and development.
- 4.3.5 We embrace diversity and inclusion, ensuring fair compensation and benefits, transparent career advancement, and a culture of employee engagement.

5. Our commitments

- 5.1 Bigbank has identified three UN Sustainable Development Goals as the areas where it has the most meaningful and positive impact through its core activities and strategic priorities:

5.1.1 Sustainable Development Goal 13: Climate Action

- 5.1.1.1 We enable renewable energy investments on bank-owned land.
- 5.1.1.2 We aim to create a sustainable work environment and reduce the environmental footprint of our operations by following the principles of Green Office in all BigBank branches.
- 5.1.1.3 We integrate climate risk assessments into risk management to ensure appropriate climate adaptation action.
- 5.1.1.4 We ensure enhanced engagement with customers operating in sectors with elevated ESG risks to understand their transition strategies and encourage progress toward more sustainable practices.

5.1.2 Sustainable Development Goal 8: Decent Work and Economic Growth

- 5.1.2.1 We aim to improve access to financial services by providing financial support and services to small, and medium-sized enterprises.

- 5.1.2.2 We aim to promote youth inclusion by offering young people opportunities for internships and job shadowing.
- 5.1.2.3 We maintain a workplace culture where every individual is respected and has equal access to opportunities, regardless of their gender, age, sexual orientation or identity, religion, ethnicity or disability. Employees performing the same role are entitled to equal pay and fair access to training and development.
- 5.1.2.4 We maintain a healthy work environment to support work-life balance by providing mental health programs and resources to reduce work stress and promote overall well-being.
- 5.1.2.5 We aim to support entrepreneurship by sharing knowledge and belief in entrepreneurship, promoting entrepreneurship as a lifestyle, educating young and aspiring entrepreneurs, and ensuring our funding is accessible to young businesses.

5.1.3 Sustainable Development Goal 11: Sustainable Cities and Communities

- 5.1.3.1 We contribute to sustainable regional development by making financial services more accessible to underserved customer segments outside major cities.
- 5.1.3.2 We aim to strengthen community resilience and ensure inclusive access to financial knowledge by promoting financial literacy.
- 5.1.3.3 We support sustainable operations by practicing the principles of green procurement and supporting local entrepreneurs.
- 5.1.3.4 We support remote work arrangements and usage of digital communication tools to reduce commuting and travel related emissions and contribute to more sustainable and livable communities.

6. Governance and supervision

- 6.1 The Policy is approved by the Supervisory Board of Bigbank based on the proposal of the Management Board.
 - 6.1.1 Management Board directs and monitors the day-to-day activities of Bigbank in the alignment of the Policy. Management Board assigns the one member of the Management Board responsible for Sustainable banking activities.
 - 6.1.2 Member of the Management Board responsible for Sustainable banking activities reports to the Management Board and is responsible for leading daily activities related to Sustainable banking as well as leading the Sustainability workgroup, which consists of Bigbank employees.
 - 6.1.3 The Sustainability workgroup consists of at least 5 permanent members.

7. Responsibilities arising from the Procedure

- 7.1 Supervisory Board:
 - 7.1.1 ensures the fulfillment of this Policy among Supervisory Board members and Management Board members;
 - 7.1.2 establishes and reviews the Policy.
- 7.2 Management Board:
 - 7.2.1 ensures the alignment and implementation of the Policy into other internal regulations of Bigbank and applicable documents.

8. Final Provisions

8.1 The Procedure shall be reviewed as needed, but at least once every two years.