

STANDARD FOR REMUNERATION

[Link to: People Policy in Kreditor](#)

Document owner	People Director (PD)
Document manager	People Director (PD)
Approved by	BoD* of Kreditor Finans AS
Applicable to	Kreditor Finans AS
Classification level	INTERNAL
Availability	Intranet at Startside
Revision	Annual or when required
Consultative bodies	Remuneration Committee and Legal in Kreditor AS

History of revision

Date	Version	Description	Author(s)
11.09.2024	1.0	Established requirements for remuneration for the Kreditor Finans AS. Standard approved by BoD in Kreditor Finans AS after discussion in management team. Document approved for the first time.	PD
14.03.2025	2.0	Updated standard with additions in: 5.1, 5.4 b and 5.4 d. Updated standard approved by BoD in Kreditor Finans AS 14.03.2025.	People Director
22-04-2026	3.0	Updated the standard regarding the remuneration committee	Group Legal Officer

Table of content

1. BACKGROUND AND PURPOSE	2
2. THIS STANDARD APPLIES TO	2
3. REGULATORY REQUIREMENTS AND OTHER REFERRALS	3
4. RELATED DOCUMENTS	3
5. PRINCIPLES	3
5.1. SPECIFIC REQUIREMENTS	3
5.2. REMUNERATION COMMITTEE	4
5.3. CONFLICT OF INTEREST	4
5.4. REMUNERATION PACKAGE	4
5.4.1. EMPLOYEES WITH CREDIT APPROVAL RIGHTS	6
5.5. INTERNAL CONTROL	6
5.6. DISCLOSURE	6
6. ROLES AND RESPONSIBILITIES. DEVIATIONS AND NON-CONFORMITIES	6
6.1. ROLES AND RESPONSIBILITY	6
6.2. PROCESS TO ESTABLISH AND REVISE THIS STANDARD	6
6.3. HANDLING OF DEVIATIONS AND NON-CONFORMITIES TO THIS STANDARD	7

1. BACKGROUND AND PURPOSE

Standard for Remuneration describes the principles, governance and control framework for remuneration in Kreditor Finans AS. The Remuneration standard shall be in accordance with obligations set by law and regulation and promote good governance and control of the company's risk, counteract high risk-taking and minimize conflict of interest.

The objectives of the Remuneration Standard are:

- promote the company's long-term ability to offer its clients financial services on competitive terms
- promote good governance and control over risk, and counteract risk-taking not in line with current regulation, policies and risk limits
- in accordance with current external and internal regulation, as well as the company's principles for good governance

The purpose of the Remuneration Standard is to attract and retain competent and motivated employees that contribute to long term value creation for the company.

2. THIS STANDARD APPLIES TO

Standard for remuneration applies to Kreditor Finans AS. It is adopted by the Board of Directors for Kreditor Finans AS. All leaders and personnel in Kreditor Finans AS are bound by the standard.

3. REGULATORY REQUIREMENTS AND OTHER REFERRALS

Standard for remuneration is designed in accordance with the following law/regulation/circular/guidance etc.:

- Financial Institutions Act chapter 15
- Financial Institutions Regulation chapter 15
- FSA Circular 2/2020 Guidance on remuneration in financial institutions and investment firms

4. RELATED DOCUMENTS

Standard for **Remuneration** is backed by processes, routines, tools, templates to the extent necessary to secure wanted behaviour. These documents are updated when needed and published on Startsideen. The following documents back this standard:

- People Policy in Kreditor
- Yearly salary review process
- The collective agreement

5. PRINCIPLES

The standard for remuneration is applicable for all employees and all kind of remuneration.

5.1. SPECIFIC REQUIREMENTS

According to the financial institution act § 15-1 and the financial institution regulation § 15-2 the company shall define the following positions:

- a. the company`s elected officers
 - b. employees with material impact on the company`s risk exposure
 - c. employees with control functions
- a. The company`s elected officers
The company`s elected officers are the managing director and the board members in Kreditor Finans AS.
 - b. Employees with substantial impact on the company`s risk exposure
 - c. Employees with control functions
Employees with control functions is the Risk- and Compliance manager.

People and Managing Director shall review and document the identification of these employees on a yearly basis.

5.2. REMUNERATION COMMITTEE

Kreditor Finans AS is not a large institution according to CRR II article 4 paragraph 1, subparagraph 146, hence the company as small and non-complex institution does not need to establish an own remuneration committee and has not done so. The parent company Kreditor AS has established a remuneration committee which on the overall level will set the framework for remuneration for the Group and is considered to have an advisory role to the board of directors in Kreditor Finans. The board of Kreditor Finans is solely and ultimately responsible for the remuneration in the company.

5.3. CONFLICT OF INTEREST

Potential conflict of interest and mitigating actions are identified in the company's Code of Conduct.

5.4. REMUNERATION PACKAGE

The remuneration package may consist of the following components:

- a. Fixed cash remuneration
- b. Variable remuneration, such as the short-term incentives and long-term incentives
 - o One-off supplement (engangstillegg)
 - o Operating allowance for car (driftstilskudd)
 - o Incentive programs
- c. Pensions
- d. Other benefits/benefits in kind
 - a. Insurance
 - b. Broadband
 - c. Mobile phone
 - d. Training
 - e. Newspaper
 - f. Other welfare leave
 - g. Financial support for further education

To ensure an appropriate balance between fixed and variable pay, the board can set a maximum percentage of variable remuneration in relation to the fixed remuneration. This percentage may vary according to the type of position the employee holds, the business unit where the employee works and local requirements.

- a. Fixed cash remuneration
Fixed cash remuneration is the fixed yearly salary for employees. The fixed cash remuneration shall be moderate, but competitive and reflect the employee's responsibilities and achievements. The fixed cash remuneration should be subject to yearly reviews.
- b. Variable remuneration
 - i) One-off supplement can be used for individual employees or groups of employees who over time have demonstrated extraordinary effort related to major projects and/or over time have contributed to results at a particularly high level within the ordinary framework of the position. One-off payments are normally given within a framework of one month's salary.

 Kreditor	Standard for Remuneration
	Authored by People

- ii) Based on the role and need for the use of a private car in the service, individual schemes are offered for operating allowance for car (driftstilskudd).
- iii) Kreditor's incentive programs may include performance targets at group, unit level and at the individual level where relevant.
 - a. A qualifying mechanism may be installed to ensure that variable pay lapses in general if Kreditor incurs losses during a year.
 - b. Incentive programs may be disbursed in the form of a cash bonus, shares, share-based instruments, including conditional shares and other generally approved instruments, all on the basis of applicable local legislation.
 - c. Variable remuneration shall not exceed 100% of fixed cash remuneration for any employees.
 - d. Kreditor Finans has established criteria for deduction to and repayment of up to 100 percent of the total variable remuneration which may be applicable to employees who have engaged in or been responsible for conduct that causes a considerable loss to the company or other unwanted behavior. When reviewing payments according to incentive programs, up to 100 percent of the payments can be revoked if this becomes apparent that the recipient has;
 - i) Participated in or been responsible for actions that have resulted in a significant loss for the group,
 - ii) Failed to meet standards of suitability and reputation,
 - iii) Was guilty of gross breach of duty or other significant breach of the employment contract.
 - e. Testing of the criteria mentioned in d. i-iii, shall be submitted and finally decided by the Board of Directors.

c. Pension and insurance

Insurance- and pension schemes guarantee employees a basic cover in the event of critical illness or death and pension payments upon retirement. In general employees are covered by personal insurance schemes including occupational injury/occupational disease, recreational accident, other illness, and group life insurance.

Employees are also enrolled in the company's contribution pension scheme (innskuddspensjon), which is in addition to the national insurance schemes.

All employees are offered health insurance and employees traveling on behalf of employer are covered by business travel insurance.

d. Severance pay

Severance pay constitutes an appropriate compensation for termination initiated by Kreditor Finans and is decided upon consideration of the individual's responsibility and decision-making powers, and it is taken into account that it must not constitute a reward for failure or misconduct.

e. Other benefits

File name: 20260612 Standard for Remuneration v3.0		
Version 3.0	Approved by BoD in Kreditor Finans AS: 12.06.2026	Page 5 of 7

 Kreditor	Standard for Remuneration
	Authored by People

The benefits offered to certain groups of employees may include mobile telephone, internet, and newspaper as well as other benefits in kind, such as coverage of a share of expenses in connection with training, different types of welfare leave, financial support for further education etc.

5.4.1. EMPLOYEES WITH CREDIT APPROVAL RIGHTS

Employees with credit approval rights shall not receive variable remuneration for the number or percentage of approved credits or other sales targets, cf. the financial institution regulation § 15-7.

5.5. INTERNAL CONTROL

The company shall at least once a year review how the standard for remuneration has been practiced and write a report. The report should be reviewed by independent control functions. The report can upon request be sent to the FSA.

5.6. DISCLOSURE

The company will disclose the remuneration standard and annual remuneration report on the company's web-page.

6. ROLES AND RESPONSIBILITIES. DEVIATIONS AND NON-CONFORMITIES

6.1. ROLES AND RESPONSIBILITY

The board of Kreditor Finans AS has the overall responsibility for ensuring that the company complies with the remuneration standard and approving the standard, and the report describing how the standard has been practiced.

6.2. PROCESS TO ESTABLISH AND REVISE THIS STANDARD

The Document owner and Document manager of this standard are People Director (PD) and Managing Director (MD). They are responsible for development and management of the standard. The standard is revised according to requirements in "Standard for Governing and Controlling Documentation", and information is given on the first page of this document.

Standard for Remuneration is one of the documents approved by the BoD, and should be revised once a year, or when external or internal changes with impact for the standard occur.

People Director (PD) and Managing Director (MD) are responsible for revision and necessary measures to safeguard the revised standard is implemented.

Due to the size, the company does not need to establish a remuneration committee. PD and MD are responsible for this standard being revised in the Group's remuneration committee before presented to the board of Kreditor Finans AS for decision. This standard must be in accordance with standard for Remuneration in Kreditor AS.

File name: 20260612 Standard for Remuneration v3.0		
Version 3.0	Approved by BoD in Kreditor Finans AS: 12.06.2026	Page 6 of 7

 Kreditor	Standard for Remuneration
	Authored by People

6.3. HANDLING OF DEVIATIONS AND NON-CONFORMITIES TO THIS STANDARD

Deviations to a standard shall be considered a breach on compliance and be reported and assessed in each individual case. The one detecting a deviation shall report it, and it shall be handled in line with the routine/process for handling deviations.

If a situation occurs where non-conformity with Standard for Remuneration will arise, the person identifying this should through the line inform the BoD who based on a risk assessment can approve the non-conformity.

An approval for non-conformity shall be documented and filed in People`s archives.