CCP 5 Glasses AS and Helsfyr Atrium AS

Account of due diligence pursuant to the Norwegian Transparency Act

1 January 2025 – 31 December 2025

1 BACKGROUND

This Transparency Act report has been prepared in accordance with Section 5 of the Transparency Act (also "**the Act**"). This report summarizes the due diligence approach of CCP 5 Glasses AS ("**CCP 5 Glasses**") and its subsidiary Helsfyr Atrium AS ("**Helsfyr Atrium**"), collectively referred to as CCP 5 Group. This report also addresses the findings of the due diligence, including measures planned to be implemented in light of the findings from the due diligence. As a structural change since the previous report, Helsfyr Atrium Drift AS ("**Helsfyr Atrium Drift**"), which was previously a wholly-owned subsidiary of Helsfyr Atrium, has been merged into Helsfyr Atrium. The merger has had no material impact on the scope or substance of this report.

The two companies comprising CCP 5 Group all offer services within Norway, but only Helsfyr Atrium exceeds the thresholds for being considered a larger enterprise under the Transparency Act. However, as a parent company will be deemed to be covered by the Act if the group as a whole meets the requirement for being a larger enterprise CCP 5 Glasses assumes it is subject to the requirements of the Act at a group level.

This report therefore covers the reporting obligations of CCP 5 Glasses, as well as Helsfyr Atrium, in satisfaction of Helsfyr Atrium's own obligations to publish an account under Section 5 of the Transparency Act.

This report covers the period from 1 January 2025 until 31 December 2025. CCP 5 Group publishes its annual accounts in English, and this account is therefore also in English.

This report will be made available on the website https://www.helsfyratrium.no/, and may also be obtained on request to Anvil Asset Advisors AS ("**Anvil**"). Information requests regarding this Transparency Act report or how CCP 5 Group addresses actual and potential adverse impacts pursuant to the Transparency Act can also be made to Anvil via tlv@anvil.no.

2 THE BUSINESS OPERATIONS OF CCP 5 GROUP

CCP 5 Glasses AS is a holding company within the Norwegian real estate sector. CCP 5 Glasses does not have any independent operations, it does not have any employees, and it only provides limited financial and management services to its subsidiary Helsfyr Atrium. The company's assets are professionally managed by Anvil, an independent asset management company that acts as an operating partner for institutional clients investing in the Nordic real estate market.

As of Dec 31, 2025, CCP 5 Glasses owned the real estate property company **Helsfyr Atrium AS** with 100% shares. The primary objective of Helsfyr Atrium AS is to own the building Helsfyr Atrium (the "**Building**"), a building housing office spaces and meeting rooms, as well as parking facilities, showers and locker rooms, and a corporate canteen. The Building was built in 2010, has been owned by CCP 5 Group since 2018, and the 31,025m^2 office building is occupied by several corporate office tenants.

Helsfyr Atrium does not have any employees. Following the merger of Helsfyr Atrium Drift into Helsfyr Atrium, Helsfyr Atrium's operations now encompass both the letting of office spaces in the Building and the direct operation of its facilities, including the Building's garage (including the letting of parking spaces to tenants), as well as operational responsibility for the meeting rooms and the canteen (the operation of which is provided by a canteen service supplier). New addendums have been entered into with all tenants in connection with the merger. Property and technical management is taken care of by the supplier Newsec Property Asset Management AS ("**Newsec**"), which also handles all service agreements, regular maintenance work, and cleaning. Furthermore, major renovation works are coordinated through the supplier Insenti AS ("**Insenti**"), which also acts as an HSE coordinator. Apart from that, Helsfyr Atrium mainly has contracts with lawyers, consultants and other service providers. During the past 12 months, tenant adaptation works have been carried out. In addition, some tenants have carried out minor internal alterations. No major work on the Building was completed in 2025. Helsfyr Atrium is also the contractor for all personnel working in the Building, such as janitors and property managers, with these activities being carried out by Newsec.

3 CCP 5 GLASSES' APPROACH TO PREVENTING ADVERSE IMPACTS ON HUMAN RIGHTS AND DECENT WORKING CONDITIONS

Since neither CCP 5 Glasses nor Helsfyr Atrium has any own employees, and the operation of the Building is outsourced to Insenti and Newsec, a key part of CCP 5 Group's approach to preventing adverse impacts on human rights and decent working conditions is based on Insenti's and Newsec's work in this regard.

Newsec, that is responsible for property and technical management of the Building, has adopted a Supplier Code of Conduct (the Newsec Supplier Code) and sets out minimum expectations to everyone that provides goods or services to Newsec. The Newsec Supplier Code includes sections on fundamental human rights and decent working conditions, as well as sustainability, data protection, competition laws, and anti-bribery and anti-corruption. It provides a right for Newsec to monitor the suppliers' activities if necessary to ensure compliance with its Supplier Code. If there are any breaches of the Newsec Supplier Code, Newsec wants to know and requires its suppliers to report any such violations. Further, the Newsec Supplier Code cascades Newsec's expectations of its own suppliers to any sub-suppliers. Newsec enters into certain agreements on behalf of Helsfyr Atrium, and the Newsec Supplier Code is applicable to these contracts.

Insenti, the supplier which coordinates major renovation works on the Building on behalf of Helsfyr Atrium, does not enter into agreements on behalf of Helsfyr Atrium, but acts as an advisor and coordinator to Heslfyr Atrium. The agreements between Anvil and Insenti regarding the Building requires Insenti to ensure that HSE standards are in line with relevant laws and regulations.

Moreover, given the key role of Insenti and Newsec in the operation of the building, risks relating to human rights and decent working conditions are to a certain extent mitigated by the fact that both Newsec and Insenti conduct due diligence covering fundamental human rights and decent working conditions under the Transparency Act, and publish reports under Section 5 of the Transparency Act on their webpages.

CCP 5 Group also requires their current main contractor to adhere to HSE and internal control requirements, to ensure decent working conditions and respect fundamental human rights, and to document their compliance with the Transparency Act.

4 ASSESSMENT OF ACTUAL AND POTENTIAL IMPACTS ON HUMAN RIGHTS AND DECENT WORKING CONDITIONS

4.1 Approach and methodology

CCP 5 Group conducts risk assessments with the purpose of identifying and assessing actual and potential adverse impacts on fundamental human rights and decent working conditions that CCP 5 Group has either caused or contributed towards, or that are directly linked to CCP 5 Group's operations, products or services via the supply chain or business partner relationships.

A high-level review of CCP 5 Group's operations, suppliers and business partners has been conducted in connection with the risk assessment. CCP 5 Group also conducts more in-depth assessments of selected suppliers, sub-suppliers and business partners that are identified as higher-risk, in order to further assess risks relating to its supply chain and business partners (as described in more detail in section 5).

4.2 Outcome of assessment of actual and potential adverse impacts on CCP 5 Glasses' own operations

CCP 5 Group has so far not identified any actual adverse impacts on human rights or decent working conditions. No personal injuries or whistleblowing cases have been reported during the reporting period.

Moreover, CCP 5 Group has assessed operational, geographical and sectoral factors relating to own operations, concluding that there is a low risk of potential adverse impacts on human rights or decent working conditions in the group's own operations. The conclusion is based on the fact that CCP 5 Group does not have any own employees, and that its operations are limited to owning a property in Norway, where all of the group's operations take place. CCP 5 Group also considers the sectoral risks connected with its operations to be low, as real estate management in itself is not considered to constitute a high risk of causing, contributing to or being linked to adverse impacts on human rights or decent working conditions. CCP 5 Group recognizes that the group could potentially be linked to adverse impacts on human rights or decent working conditions caused or contributed to by tenants of the Building owned by the group. During the reporting period, CCP 5 Group has taken the human rights and decent working conditions profile of the incoming tenants into account in its assessment. Given that the tenants are corporations based in Norway, and that their relationship with CCP 5 Group is intended to be stable and long-lasting, this risk is at present considered to be low. Nonetheless, CCP 5 Group will continue to take this risk into account in connection with future changes to its tenant population.

4.3 Outcome of assessment of actual and potential adverse impacts in CCP 5 Glasses' supply chains and business partner relationships

CCP 5 Group has so far not identified any actual adverse impacts on human rights or decent working conditions in the group's supply chains or business partner relationships. There have not been any HSE incidents relating to the operation of the Building in 2025. CCP 5 Group has also followed up with key suppliers regarding their due diligence, which confirm that they have not identified any concrete risks or actual adverse impacts on human rights or decent working conditions.

Moreover, CCP 5 Group has assessed risks in its supply chains and business partner relationships based on operational, geographical and sectoral factors. The following *significant risks* of adverse impacts on human rights and decent working conditions have been identified in previous years, and remain valid for the current reporting period:

- Relating to *rebuildings and major renovations*, generic risk factors in the industry include the reliance on low-salaried / low-skilled labour, reliance on migrant workers, poor working conditions and HSE standards (including exposure to noise, chemicals, injuries relating to heavy objects and machinery, risk of falling etc.), reliance on third parties to recruit, hire and/or manage the workforce, discrimination, and illegal overtime. Nonetheless, rebuildings and major renovations are not carried out regularly, and no specific risks have been identified for CCP 5 Group's relevant suppliers in this respect. Additionally, the general risks are mitigated by Insenti's role as an HSE coordinator, and the fact that Insenti conducts due diligence under the Transparency Act.
- Relating to *property and technical management* (refurbishments, janitor/technical manager, lift, painting), generic risk factors in the industry include the reliance on low-salaried / low-skilled labour, reliance on migrant workers, poor working conditions and HSE standards (including exposure to noise and chemicals), and reliance on third parties to recruit, hire and/or manage the workforce. However, these general risks are mitigated by the fact that CCP 5 Group relies on a stable relationship with only one supplier, Newsec, that is based in Norway, conducts due diligence under the Transparency Act, and mainly uses stable framework agreements with sub-suppliers, where requirements on human rights and decent working conditions are set, amongst others through Newsec's Supplier Code of Conduct.

5 MITIGATING MEASURES AND TRACKING PROGRESS

Since none of the companies in the CCP 5 Group have any employees of their own, mitigating measures in 2025 relating to CCP 5 Group's operations were mainly implemented by CCP 5 Group's key suppliers.

As mentioned earlier in this report, Newsec largely relies on framework agreements when acquiring service providers relating to their real estate portfolio. To be qualified as a supplier, potential suppliers must confirm compliance with Newsec's Supplier Code of Conduct, and suppliers must submit declarations of HSE standards, corporate responsibility and sustainability when entering into framework agreements.

During the period, CCP 5 Group has implemented contractual clauses relating to human rights and decent working conditions into its contractor agreement with Østlandske Bygg og Betong AS, the main contractor performing works at the asset. This based on prioritising suppliers representing the highest potential risk.

CCP 5 Group does not have a separate whistleblowing channel. However, Newsec has established a whistleblowing channel, made easily available on the company's website, through which anyone can report concerns anonymously, and have their reports handled by Newsec in conjunction with a third-party provider without fear of retaliation. Moreover, Newsec operates a service portal, through which tenants can report concerns directly to Newsec. Concerns can also be raised through an app relating to the Building, operated by 4Service Facility AS. Similarly, Insenti has – as reported in their Transparency Act account for 2024 – a whistleblowing channel and grievance mechanism accessible on their webpage, aimed at uncovering any negative consequences. No relevant concerns or whistleblowing cases have been reported through any of these channels during the reporting period.

In the course of 2026, CCP 5 Group will strive, through best efforts, to continually improve its risk assessments to further assess the risks of actual or potential adverse impacts on human rights and decent working conditions in its supply chains and business partner relationships. The group will continue their endeavour to implement procedures for carrying out due diligence in CCP 5 Group's own operations, as well as for all new and existing suppliers and business partners. In particular, CCP 5 Group will seek to gain further visibility into the subcontractor chain of contractors engaged to carry out works at the Building in order to verify compliance with relevant contractual requirements.

Moreover, CCP 5 Group will continuously consider the necessity for CCP 5 Group to implement further measures relating to human rights and decent working conditions. In order to improve our due diligence assessments, CCP 5 Group also aims to engage in dialogue with selected stakeholders, insofar relevant. We expect these planned measures to:

- Improve oversight, control and follow-up of the respect of human rights and decent working conditions in CCP 5 Group's own operations, supply chain and business partner relationships.
- Ensure that CCP 5 Group has the necessary contractual framework for acquiring information about the respect for fundamental human rights and decent working conditions in our supply chain and business partner relationships.
- Create obligations and incentives relating to the respect for human rights and decent working conditions in CCP 5 Group's supply chain and business partner relationships.

SIGNATURES

30 June 2026

CCP 5 Glasses AS:

Marc Desnous

Marc Alain Desnous
Chair of the board

Roosa Sofia Rinne

Roosa Sofia Rinne
Board member

Jean-Philipe Blangy

Jean-Philippe Jean Jacques Blangy
Board member

Helsfyr Atrium AS:

Anne-Julie Marie-France Stephanie Bellaize
Chair of the board

Roosa Sofia Rinne

Roosa Sofia Rinne
Board member

Jean-Philipe Blangy

Jean-Philippe Jean Jacques Blangy
Board member