# NORWEGIAN TRANSPARENCY ACT

DISCLOSURE FOR J.P. MORGAN SE – OSLO BRANCH June 2024

J.P.Morgan

**J.P. Morgan SE - Oslo Branch:** Disclosure Under The Norwegian Transparency Act For The Financial Year Ended 2023

#### Background

The Norwegian Transparency Act requires J.P. Morgan SE - Oslo Branch to publish an annual report regarding its transparency and work on fundamental human rights and decent working conditions.

## J.P. Morgan SE - Oslo Branch

**J.P. Morgan SE - Oslo Branch** with reg.no. 921 560 427 (the "**Norwegian Branch**") is a Norwegian Registered Foreign Company of the German company J.P. Morgan SE with reg.no. HRB126056 ("**JPMSE**" or the "**Company**"). JPMSE is a subsidiary of the U.S. parent company JPMorgan Chase & Co. (the "Firm" or "Firmwide")

## Principal activity of J.P. Morgan SE

J.P. Morgan SE, combines the main business areas<sup>1</sup> of Corporate & Investment Bank ("CIB"), Private Bank ("PB") and Commercial Banking ("CB") in a single, EU headquartered pan-European banking entity with a network of branches in the European Economic Area ("EEA") and the United Kingdom. It thereby facilitates the provision of J.P. Morgan Group's global products and capabilities to EEA clients of the CIB and CB, as well as EMEA clients of the PB, and provides access to Euro liquidity and products for globally operating clients. The Company is authorized and regulated by the German Federal Financial Supervisory Authority ("BaFin") and under the direct supervision as a "Significant Institution" by the European Central Bank.

The principal activities of the of J.P. Morgan SE – Oslo Branch are the provision of investment banking business covering Global Corporate Banking services and the provision of international custody products and local depositary services.

J.P. Morgan SE – Oslo Branch is subject to and its activities are part of the global efforts set out in the Firm's Environmental, Social and Governance materials which we refer to below and in the JPMSE Annual Report and the Non-Financial Report (an Annex to the 2023 J.P. Morgan SE Annual Report). Due to its comparative size, J.P Morgan SE – Oslo Branch does not have formally established targets in relation to environmental, climate and social aspects.

#### Available Disclosures, Standards, and Policies

- The <u>2023 J.P. Morgan SE Annual Report</u>
- J.P. Morgan SE's <u>Non-Financial Report</u> (an Annex to the 2023 J.P. Morgan SE Annual Report); includes the Business Principles and Business Model.
- The Firm's <u>Modern Slavery Act Statement</u>, affirmed by the Management Board of J.P. Morgan SE, outlines the steps we are taking across the Firm to mitigate the potential risk of modern slavery occurring in our business and supply chain. It is our policy that we will not knowingly provide financial services to clients where we determine that there is

<sup>&</sup>lt;sup>1</sup> On January 25, 2024, JPMorgan Chase & Co. announced new responsibilities for several key executives. As a result of these organizational changes, the Firm has reorganized its business segments to reflect the manner in which the segments will be managed. The reorganization of the business segments became effective in the second quarter of 2024.

substantiated evidence of forced labor, harmful child labor, human trafficking or other types of modern slavery, and where such client has not put into place adequate practices and policies to remediate such human rights abuses.

The Firm strives to measure the effectiveness of its actions to manage modern slavery risks and engages with a range of stakeholders on this topic. The Firm periodically assesses the effectiveness of its policies and practices described in the Firm's Modern Slavery Group Statement, which includes considerations of changing global circumstances and evolving policy environments.

- The Firm's <u>2023 ESG Report</u> acknowledges that human rights issues are a significant global challenge. The Firm acknowledges that its business has the potential to impact surrounding communities and the environment; as such, it is important that it considers human rights issues when making business decisions. While national governments bear primary responsibility to protect the human rights of their citizens, including their safety and security, the Firm strives to respect and promote human rights with its employees, suppliers and clients, as guided by the <u>United Nations Universal Declaration of Human Rights</u> and the <u>UN Guiding Principles on Business and Human Rights</u>
- The Firm's <u>Code of Conduct</u> and the Firm's <u>Supplier Code of Conduct</u> ("Supplier Code") communicate the firm's expectation that business be conducted ethically and in compliance with the law.

JPMorgan Chase & Co seeks responsible business conduct in its supply chain. The Firm's Supplier Code sets out the Firm's principles and expectations for suppliers, vendors, consultants, agents, contractors, temporary workers, and other third parties working for or on behalf of the Firm, as well as the owners, officers, directors, employees, consultants, affiliates, contractors, and sub-contractors of these supplier organizations and entities.

The Supplier Code communicates the responsibilities of suppliers across a range of issues, including the need to promote and respect human rights by working to prevent harmful child and/or forced labor and human trafficking in their operations and supply chains, and by instituting practices and operations that are consistent with the framework provided by the United Nations Guiding Principles on Business and Human Rights, as well as rights and prohibitions included in other international human rights agreements. For example, suppliers must comply with all labor laws and employ only workers who meet applicable minimum legal age requirements in the jurisdiction, provide a safe work environment, free of threats or intimidation or physical harm, and comply with all applicable wage and hour labor laws and regulations governing employee compensation and working hours.

The Supplier Code also includes an obligation for the Firm's suppliers to report any concern or suspected violation of the law or regulation related to the Firm's business or a violation of the Supplier Code to the Firm's Conduct Hotline or another reporting channel. Firmwide operational risk practices are in place that enable appropriate escalation and remediation of issues in the event such violations are reported. Additionally, the Firm's supplier oversight program enables risk-based due diligence on in-scope suppliers across a range of Environmental, social and Governance (ESG) and Diversity, Equity and Inclusion (DEI) requirements including screenings for human rights issues. Finally, the Firm's standard contractual agreements require suppliers to adhere to all applicable laws and regulations and to the Supplier Code.