

## Forusbeen 50 AS and CFI Stavanger Holdings AS

### Transparency Act Statement 2022

Forusbeen 50 AS and CFI Stavanger Holdings AS (together, the "Enterprise") conduct business in Norway solely through the ownership of one real estate class A office campus in Stavanger, which property is 100% occupied by and serves as the global headquarters of a single tenant (the "Tenant"). The property owning Enterprise collects rents from the Tenant, which Tenant is responsible for all operations, maintenance and services at the property.

From time to time, the Enterprise may be subject to the Norwegian Transparency Act of 2022 as a "larger enterprise", as defined therein, based on sales revenue and balance sheet total thresholds; provided, however, neither business has any employees.

The entities comprising the Enterprise are indirect subsidiaries of BrightSpire Capital, Inc. ("BRSP"), an internally-managed commercial real estate ("CRE") credit REIT focused on originating, acquiring, financing and managing a diversified portfolio of CRE debt investments and net leased real estate investments predominantly in the United States. CRE debt investments primarily consist of senior mortgage loans. Like the Enterprise subsidiaries, BRSP does not have any employees or physical presence in Norway other than the ownership of the office campus by the Enterprise. BRSP's only investment outside of the United States is this single investment interest held by the Enterprise.

The Enterprise recognizes the importance of complying with local regulations, including the Norwegian Transparency Act of 2022. The Enterprise benefits from policies implemented by BRSP, including, but not limited to: (i) Code of Business Conduct and Ethics; (ii) Code of Business Conduct and Ethics for Senior Financial Officers; (iii) Corporate Governance Guidelines; (iv) General IT and Security Policy (including information security and security incident response policies); (v) Auditor Hiring Policy; (vi) Audit and Non-Audit Pre-Approval Policy; and (vii) Complaint Procedures for Accounting and Audit Matters.

In accordance with Section 4(b) of the Norwegian Transparency Act of 2022, the Enterprise has taken into consideration its limited size, single office campus real property ownership, and no employees, and identified no actual or potential adverse impacts on fundamental human rights or decent working conditions in the ownership of such office campus real property in Norway. In addition, the Enterprise (solely as a property owner) has evaluated and does not believe it engages in any operations, products or services of any kind, including by supply chain or otherwise, that may cause or contribute toward adverse impacts on fundamental human rights or decent working conditions. As of the date of this report, the Enterprise has considered and determined that Section 4 items (c)-(f) of the Norwegian Transparency Act of 2022, regarding the implementation of measures to cease, prevent or mitigate adverse impacts are not necessary, nor has the Enterprise had to address any actual or potential adverse impacts pursuant to Section 4.

BRSP has implemented diligence and periodic review protocols of business counterparties, including borrowers and sponsors (i) to better understand counterparty commitments made to environmental, governance and social ("ESG") initiatives and, (ii) in return, to educate and highlight to counterparties the relevance of such ESG initiatives. In addition, BRSP's investment and portfolio management teams diligence and evaluate the extent that

environmental and sustainability initiatives are implemented by our borrowers/sponsors and in target assets.

In evaluating the Tenant's regard for fundamental human rights and decent working conditions, the Enterprise has focused on its Tenant's most recent disclosure, including under the Norwegian Transparency Act of 2022 and additional reports on human rights and culture, values and code of conduct, at [www.equinor.com](http://www.equinor.com) and [www.equinor.com/sustainability/respecting-human-rights](http://www.equinor.com/sustainability/respecting-human-rights).

The account of business conduct, policies and due diligence contained herein is intended to satisfy the provisions of Section 5 of the Norwegian Transparency Act of 2022.

For any inquiries related to our operations or compliance with the Norwegian Transparency Act, please direct your correspondence to our general counsel at [legal@brightspire.com](mailto:legal@brightspire.com).

*As of June 16, 2023*