



ÅRSREGNSKAPET FOR REGNSKAPSÅRET 2020 - GENERELL INFORMASJON

Enheten

Organisasjonsnummer: 912 383 385
Organisasjonsform: Aksjeselskap
Foretaksnavn: PROMENADEN NSG 13 AS
Forretningsadresse: c/o Promenaden Management AS
Nedre Slottsgate 8
0157 OSLO

Regnskapsår

Årsregnskapets periode: 01.01.2020 - 31.12.2020

Konsern

Morselskap i konsern: Nei

Regnskapsregler

Regler for små foretak benyttet: Ja
Benyttet ved utarbeidelsen av årsregnskapet til selskapet: Regnskapslovens alminnelige regler

Årsregnskapet fastsatt av kompetent organ

Bekreftet av representant for selskapet: Haron Ascanio Cazzaniga
Dato for fastsettelse av årsregnskapet: 08.06.2021

Grunnlag for avgivelse

År 2020: Årsregnskapet er elektronisk innlevert
År 2019: Tall er hentet fra elektronisk innlevert årsregnskap fra 2020

Det er ikke krav til at årsregnskapet m.v. som sendes til Regnskapsregisteret er undertegnet. Kontrollen på at dette er utført ligger hos revisor/enhetens øverste organ. Sikkerheten ivaretas ved at innsender har rolle/rettighet for innsending av årsregnskapet via Altinn, og ved at det bekreftes at årsregnskapet er fastsatt av kompetent organ.

Brønnøysundregistrene, 25.06.2022



Resultatregnskap

Beløp i: NOK	Note	2020	2019
RESULTATREGNSKAP			
Inntekter			
Rental income		28 635 734	28 708 377
Sum inntekter		28 635 734	28 708 377
Kostnader			
Personnel expenses	1		
Depreciation	2	12 562 451	13 353 818
Other operating expenses	1	6 153 640	6 928 486
Sum kostnader		18 716 091	20 282 304
Driftsresultat		9 919 643	8 426 073
Finansinntekter og finanskostnader			
Renteinntekt fra foretak i samme konsern	3		220 480
Annen renteinntekt		9 187	8 828
Other financial income		118	
Sum finansinntekter		9 306	229 308
Rentekostnad til foretak i samme konsern	3	3 786 915	2 788 921
Annen rentekostnad		8 341	1 172
Sum finanskostnader		3 795 256	2 790 093
Netto finans		-3 785 950	-2 560 785
Ordinært resultat før skattekostnad		6 133 692	5 865 288
Tax on ordinary result	5	1 349 413	1 290 920
Ordinært resultat etter skattekostnad		4 784 279	4 574 368
Årsresultat		4 784 279	4 574 368
Årsresultat etter minoritetsinteresser		4 784 279	4 574 368
Totalresultat		4 784 279	4 574 368
Overføringer og disponeringer			



Resultatregnskap

Beløp i: NOK	Note	2020	2019
Avgitt konsernbidrag		-10 238 453	-11 036 566
From share premium reserve		-5 454 174	
Sum overføringer og disponeringer	6	4 784 279	-1 887 831



Balanse

Beløp i: NOK	Note	2020	2019
BALANSE - EIENDELER			
Anleggsmidler			
Immaterielle eiendeler			
Utsatt skattefordel	5		
Varige driftsmidler			
Buildings and land		190 030 519	202 517 505
Ships	2		
Equipment and other movables		21 650	21 650
Sum varige driftsmidler	2	190 052 169	202 539 155
Sum anleggsmidler		190 052 169	202 539 155
Omløpsmidler			
Varer			
Fordringer			
Accounts receivable		585 084	347 717
Other short-term receivables		21 391 901	8 583 280
Konsernfordringer	3	8 731 950	9 674 960
Sum fordringer		30 708 935	18 605 957
Bankinnskudd, kontanter og lignende			
Cash and bank deposits		837	43 900
Sum bankinnskudd, kontanter og lignende		837	43 900
Sum omløpsmidler		30 709 772	18 649 857
SUM EIENDELER		220 761 941	221 189 012
BALANSE - EGENKAPITAL OG GJELD			
Egenkapital			
Innskutt egenkapital			
Share capital	4, 6	108 000	103 200



Balanse

Beløp i: NOK	Note	2020	2019
Beholdning av egne aksjer	6		
Overkurs	6	141 806 236	97 265 209
Annen innskutt egenkapital	6		
Sum innskutt egenkapital		141 914 236	97 368 409
Opptjent egenkapital			
Other equity	6	-6 462 198	-6 462 198
Sum opptjent egenkapital		-6 462 198	-6 462 198
Sum egenkapital		135 452 037	90 906 211
Gjeld			
Langsiktig gjeld			
Utsatt skatt	5	581 038	2 119 395
Sum avsetninger for forpliktelser		581 038	2 119 395
Annen langsiktig gjeld			
Liabilities to Group companies	3	67 852 504	109 581 642
Sum annen langsiktig gjeld		67 852 504	109 581 642
Sum langsiktig gjeld		68 433 542	111 701 037
Kortsiktig gjeld			
Leverandørgjeld		70 212	241 570
Tax payable	5		
Public duties payable			20 974
Utbytte	3	13 126 223	15 416 185
Other current debt		3 679 927	2 903 035
Sum kortsiktig gjeld		16 876 362	18 581 764
Sum gjeld		85 309 904	130 282 801
SUM EGENKAPITAL OG GJELD		220 761 941	221 189 012



Brønnøysundregistrene

ÅRSREGNSKAP FOR REGNSKAPSÅRET 2020 - GENERELL INFORMASJON

Journalnummer: 2021 621826

Enheten

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Årsregnskapet fastsatt av kompetent organ

Bekreftet av representant for selskapet: Haron Ascanio Cazzaniga
Dato for fastsettelse av årsregnskapet: 08.06.2021

Revisjon

Ekstern autorisert regnskapsfører har i løpet av regnskapsåret bistått ved den løpende regnskapsføringen eller utført andre tjenester for selskapet enn å utarbeide årsregnskapet: Ja

Grunnlag for avgivelse

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År 2019: Tall er hentet fra elektronisk innlevert årsregnskap fra 2020.

Det er ikke krav til at årsregnskapet m.v. som sendes til Regnskapsregisteret er undertegnet. Kontrollen på at dette er utført ligger hos revisor/enhetens øverste organ. Sikkerheten ivaretas ved at innsender har rolle/rettighet for innsending av årsregnskapet via Altinn, og ved at det bekreftes at årsregnskapet er fastsatt av kompetent organ.

Brønnøysundregistrene, 17.08.2021



Organisasjonsnr: 912 383 385
PROMENADEN NSG 13 AS

RESULTATREGNSKAP

Beløp i: NOK	Note	2020	2019
RESULTATREGNSKAP			
Inntekter			
Rental income		28 635 734	28 708 377
Sum inntekter		28 635 734	28 708 377
Kostnader			
Personnel expenses	1		
Depreciation	2	12 562 451	13 353 818
Other operating expenses	1	6 153 640	6 928 486
Sum kostnader		18 716 091	20 282 304
Driftsresultat		9 919 643	8 426 073
Finansinntekter og finanskostnader			
Renteinntekt fra foretak i samme konsern	3		220 480
Annen renteinntekt		9 187	8 828
Other financial income		118	
Sum finansinntekter		9 306	229 308
Rentekostnad til foretak i samme konsern	3	3 786 915	2 788 921
Annen rentekostnad		8 341	1 172
Sum finanskostnader		3 795 256	2 790 093
Netto finans		-3 785 950	-2 560 785
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Årsresultat		4 784 279	4 574 368
Årsresultat etter minoritetsinteresser		4 784 279	4 574 368
Totalresultat		4 784 279	4 574 368
Overføringer og disponeringer			
Avgitt konsernbidrag		-10 238 453	-11 036 566
From share premium reserve		-5 454 174	
Sum overføringer og disponeringer	6	4 784 279	-1 887 831



Organisasjonsnr: 912 383 385
PROMENADEN NSG 13 AS

BALANSE

Beløp i: NOK **Note** **2020** **2019**

BALANSE - EIENDELER

Anleggsmidler

Immaterielle eiendeler

Utsatt skattefordel 5

Varige driftsmidler

Buildings and land 190 030 519 202 517 505

Ships 2

Equipment and other
movables 21 650 21 650

Sum varige driftsmidler 2 190 052 169 202 539 155

Sum anleggsmidler 190 052 169 202 539 155

Omløpsmidler

Varer

Fordringer

Accounts receivable 585 084 347 717

Other short-term
receivables 21 391 901 8 583 280

Konsernfordringer 3 8 731 950 9 674 960

Sum fordringer 30 708 935 18 605 957

Bankinnskudd, kontanter

og lignende

Cash and bank deposits 837 43 900

Sum bankinnskudd,
kontanter og lignende 837 43 900

Sum omløpsmidler 30 709 772 18 649 857

SUM EIENDELER 220 761 941 221 189 012

BALANSE - EGENKAPITAL OG GJELD

Egenkapital

Innskutt egenkapital

Share capital 4, 6 108 000 103 200

Beholdning av egne aksjer 6

Overkurs 6 141 806 236 97 265 209

Annen innskutt egenkapital 6

Sum innskutt egenkapital 141 914 236 97 368 409

Opptjent egenkapital

Other equity 6 -6 462 198 -6 462 198

Sum opptjent egenkapital -6 462 198 -6 462 198



Sum egenkapital		135 452 037	90 906 211
Gjeld			
Langsiktig gjeld			
Utsatt skatt	5	581 038	2 119 395
Sum avsetninger for forpliktelser		581 038	2 119 395
Annen langsiktig gjeld			
Liabilities to Group companies	3	67 852 504	109 581 642
Sum annen langsiktig gjeld		67 852 504	109 581 642
Sum langsiktig gjeld		68 433 542	111 701 037
Kortsiktig gjeld			
Leverandørgjeld		70 212	241 570
Tax payable	5		
Public duties payable			20 974
Utbytte	3	13 126 223	15 416 185
Other current debt		3 679 927	2 903 035
Sum kortsiktig gjeld		16 876 362	18 581 764
Sum gjeld		85 309 904	130 282 801
SUM EGENKAPITAL OG GJELD		220 761 941	221 189 012



Organisasjonsnr: 912 383 385
PROMENADEN NSG 13 AS

NOTEOPPLYSNINGER - SELSKAP - alle poster oppgitt i hele tall

Note

Antall årsverk i regnskapsåret

Virksomheten har hatt følgende antall årsverk:
0.00



Annual Report 2020 Promenaden Nsg 13 AS

Revenue statement
Balance sheet
Notes to the Accounts

Org.no.: 912 383 385



Promenaden Nsg 13 AS

Income statement for the year ended 31.12.2020

Operating income and operating expenses	Note	2020	2019
Rental income		28 635 734	28 708 377
Total operating income		28 635 734	28 708 377
Depreciation	2	12 562 451	13 353 818
Other operating expenses	1	6 153 640	6 928 486
Total operating expenses		18 716 091	20 282 304
Operating profit		9 919 643	8 426 073
Financial income and expenses			
Interest income from group companies	3	0	220 480
Other interest income		9 187	8 828
Other financial income		118	0
Interest expense to group companies	3	3 786 915	2 788 921
Other interest expenses		8 341	1 172
Net financial items		-3 785 950	-2 560 785
Result before tax		6 133 692	5 865 288
Tax on ordinary result	5	1 349 413	1 290 920
Ordinary result after tax		4 784 279	4 574 368
Result after tax		4 784 279	4 574 368
Brought forward			
Given intra-group contribution		10 238 453	11 036 566
From share premium reserve		5 454 174	0
Transferred from other equity		0	6 462 198
Total brought forward	6	4 784 279	4 574 368



Promenaden Nsg 13 AS

Balance sheet for the year ended 31.12.2020

Assets	Note	2020	2019
Fixed assets			
Tangible assets			
Buildings and land		190 030 519	202 517 505
Equipment and other movables		21 650	21 650
Total tangible assets	2	190 052 169	202 539 155
Total fixed assets		190 052 169	202 539 155
Current assets			
Debtors			
Accounts receivable		585 084	347 717
Other short-term receivables		21 391 901	8 583 280
Short-term receivables from group companies	3	8 731 950	9 674 960
Total receivables		30 708 935	18 605 957
Cash and bank deposits		837	43 900
Total current assets		30 709 772	18 649 857
Total assets		220 761 941	221 189 012



Promenaden Nsg 13 AS

Balance sheet for the year ended 31.12.2020

Equity and liabilities	Note	2020	2019
Equity			
Paid-up equity			
Share capital	4, 6	108 000	103 200
Share premium reserve	6	141 806 236	97 265 209
Total paid-up equity		141 914 236	97 368 409
Retained earnings			
Other equity	6	6 462 198	6 462 198
Total retained earnings		-6 462 198	-6 462 198
Total equity		135 452 037	90 906 211
Liabilities			
Deferred tax	5	581 038	2 119 395
Total provisions		581 038	2 119 395
Other long-term liabilities			
Liabilities to Group companies	3	67 852 504	109 581 642
Total of other long term liabilities		67 852 504	109 581 642
Current debt			
Accounts payable		70 212	241 570
Public duties payable		0	20 974
Liabilities to Group companies	3	13 126 223	15 416 185
Other current debt		3 679 927	2 903 035
Total current debt		16 876 362	18 581 764
Total liabilities		85 309 904	130 282 801
Total equity and liabilities		220 761 941	221 189 012

Oslo, _____, 08.06.2021
The board of Promenaden Nsg 13 AS

Annette Eriksrud Lund
Member of the board

Mark Peter Gamble
Chairman of the board



Promenaden Nsg 13 AS

Notes to the financial statements for the year ended 31.12.2020

Accounting principles

The annual accounts have been prepared in accordance with the Accounting Act and Norwegian generally accepted accounting principles.

Taxes

The tax charge in the income statement includes both payable taxes for the period and changes in deferred tax. Deferred tax is calculated at relevant tax rates on the basis of the temporary differences which exist between accounting and tax values, and any carryforward losses for tax purposes at the year-end. Tax enhancing or tax reducing temporary differences, which are reversed or may be reversed in the same period, have been eliminated. The disclosure of deferred tax benefits on net tax reducing differences which have not been eliminated, and carryforward losses, is based on estimated future earnings. Deferred tax and tax benefits which may be shown in the balance sheet are presented net.

Classification of balance sheet items

Assets intended for long term ownership or use have been classified as fixed assets. Fixed assets are stated at acquisition cost, net of accumulated depreciation. The depreciation period depends on the expected useful life of the respective item. The straight-line method of depreciation is applied. Fixed assets are written down to recoverable value in the event of impairment that is not expected to be temporary. The recoverable amount is the higher of net realizable value and value in use.

Current assets and current liabilities include items falling due within one year of the balance sheet date, and items related to the business cycle. Current assets are valued at the lower of cost and net realizable value.

Revenue and expenses

Rental income is recognised on the accruals basis. Operating and interest expenses are also recognised when they are incurred.



Promenaden Nsg 13 AS

Notes to the financial statements for the year ended 31.12.2020

Note 1 Payroll expenses, numbers of employees, remuneration, loans to employees etc.

The company had no employees in 2020. There have been no directors' fees accrued or paid.
The company is not required to follow the Act on Mandatory Occupational Pensions.

Auditor's fees (ex. VAT)	2020	2019
Audit	11 500	11 000
Other services	14 938	28 894
Total auditor's fees	26 438	39 894

Note 2 Fixed assets

	Buildings
Purchase cost as of 01.01.20	92 693 296
+ Inflow purchased fixed assets	
= Acquisition cost 31.12.20	92 693 296
Accumulated depreciation 31.12.20	10 421 445
= Book value 31.12.20	82 271 851
This year's ordinary depreciations	2 326 873
Economic life	100 years
Depreciation plan	Straight line
	Modifications
Purchase cost as of 01.01.20	121 685 969
+ Inflow purchased fixed assets	
= Acquisition cost 31.12.20	121 685 969
Accumulated depreciation 31.12.20	40 484 687
= Book value 31.12.20	81 201 282
This year's ordinary depreciations	10 235 578
Economic life	25 years
Depreciation plan	Straight line
	Work in progress
Purchase cost as of 01.01.20	8 759 822
+ Inflow purchased fixed assets	75 464
= Acquisition cost 31.12.20	8 835 286
Accumulated depreciation 31.12.20	
= Book value 31.12.20	8 835 286
This year's ordinary depreciations	
Economic life	No depreciation
Depreciation plan	



Promenaden Nsg 13 AS

Notes to the financial statements for the year ended 31.12.2020

	Land
Purchase cost as of 01.01.20	17 722 100
+ Inflow purchased fixed assets	
= Acquisition cost 31.12.20	17 722 100
Accumulated depreciation 31.12.20	
= Book value 31.12.20	17 722 100

This year's ordinary depreciations

Economic life No depreciation
Depreciation plan

	Other non-deprec. assets
Purchase cost as of 01.01.20	21 650
+ Inflow purchased fixed assets	
= Acquisition cost 31.12.20	21 650
Accumulated depreciation 31.12.20	
= Book value 31.12.20	21 650

This year's ordinary depreciations

Economic life No depreciation
Depreciation plan

	Total
Purchase cost as of 01.01.20	240 882 837
+ Inflow purchased fixed assets	75 464
= Acquisition cost 31.12.20	240 958 301
Accumulated depreciation 31.12.20	50 906 132
= Book value 31.12.20	190 052 169
This year's ordinary depreciations	12 562 451



Promenaden Nsg 13 AS

Notes to the financial statements for the year ended 31.12.2020

Note 3 Liabilities / assets pledged as security, guarantees etc.

	2020	2019
Long term liabilities to Group companies	57 468 557	109 581 642
Short term liabilities to Group companies	13 126 223	15 416 185
Short term receivables from Group companies	21 170 125	9 674 960

The company's property is used as security for a loan of NOK 1 825 000 000 owned by Group company Promenaden High Street AS to its bank. The security is limited at a value of NOK 170 000 000

The net book value of assets pledge as security is NOK 190 052 169.

The company has access to Promenaden Property group cash pool. The net balance of the cash pool cannot be negative. Each company in the cash pool has access to an overdraft facility. Any positive cash balance accruing to companies in the cash pool arrangement are used as security for overdrawn positions.

Note 4 Share capital, shareholders etc.

The company's share capital is NOK 103 200 consisting of 2 400 shares each with a par value of NOK 43

Company shareholders:	Ownership (%)	Numbers of shares
Promenaden High Street AS	100 %	2 400

Consolidated financial statements have been prepared by MARK Tomahawk AS.
These are available at the company's premises at Nedre Slottsgate 8, 0157 Oslo.



Promenaden Nsg 13 AS

Notes to the financial statements for the year ended 31.12.2020

Note 5 Tax

This year's tax expense	2020	2019
Entered tax on ordinary profit/loss:		
Payable tax	2 887 770	2 971 852
Changes in deferred tax	-1 538 357	-1 680 932
Tax expense on ordinary profit/loss	1 349 413	1 290 920
Taxable income:		
Ordinary result before tax	6 133 692	5 865 288
Permanent differences	0	2 530
Changes in temporary differences	6 992 531	7 640 600
Provided intra-group contribution	-13 126 223	-13 508 418
Taxable income	0	0
Payable tax in the balance:		
Payable tax on this year's result	2 887 769	2 174 468
Payable tax on provided Group contribution	-2 887 769	-2 174 468
Total payable tax in the balance	0	0
Calculation of effective tax rate		
Profit before tax	6 133 692	5 865 288
Calculated tax on profit before tax	1 349 412	1 290 363
Tax effect of permanent differences	0	557
Total	1 349 412	1 290 920
Effective tax rate	22,0 %	22,0 %

The tax effect of temporary differences that has formed the basis for deferred tax and deferred tax advantages, specified on type of temporary differences

	2020	2019	Difference
Tangible assets	2 641 082	9 757 537	7 116 455
Accounts receivable	0	-123 924	-123 924
Total	2 641 082	9 633 613	6 992 531
Basis for deferred tax	2 641 082	9 633 613	6 992 531
Deferred tax (22 %)	581 038	2 119 395	1 538 357



Promenaden Nsg 13 AS

Notes to the financial statements for the year ended 31.12.2020

Note 6 Shareholders' equity

	Share capital	Share premium	Other equity	Total
Equity 01.01	103 200	97 265 209	-6 462 198	90 906 211
Share capital increase	4 800	49 995 200		50 000 000
Group contribution		-10 238 453	0	-10 238 453
Profit for the year		4 784 279	0	4 784 279
Equity 31.12	108 000	141 806 236	-6 462 198	135 452 037

Note 7 Continued operations / events after the balance sheet date

The World Health Organization declared corona outbreaks a global pandemic on March 11, 2020. The authorities have implemented comprehensive measures to prevent the spread.

At the same time, the authorities have implemented cost- and liquidity-saving measures to alleviate business and employees in relation to the challenges that arise as a consequence of the spread of infection measures.

The management of the company has implemented measures to limit the financial consequences on the company's assets, revenues, costs and financing, in order to ensure the company's continued operations.

To prevent the spread and disease-related costs, the management has implemented internal routines in accordance with the authorities' requirements.

As the board assesses the consequences of the situation and the effects of the measures now, there is a basis for basing continued operations on the presentation of the annual accounts for 2020.

In accordance with the Accounting Act § 3-3a, it is confirmed that the preconditions for continued operations are present.



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To the General Meeting of Promenaden NSG 13 AS

Independent auditor's report

Report on the Audit of the Financial Statements

Opinion

We have audited the financial statements of Promenaden NSG 13 AS showing a profit of NOK 4 784 279. The financial statements comprise the balance sheet as at 31 December 2020, the income statement for the year then ended, and notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements are prepared in accordance with law and regulations and give a true and fair view of the financial position of the Company as at 31 December 2020, and its financial performance for the year then ended in accordance with the Norwegian Accounting Act and accounting standards and practices generally accepted in Norway.

Basis for Opinion

We conducted our audit in accordance with laws, regulations, and auditing standards and practices generally accepted in Norway, including International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Financial Statements* section of our report. We are independent of the Company as required by laws and regulations, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Responsibilities of the Board of Directors for the Financial Statements

The Board of Directors (management) is responsible for the preparation in accordance with law and regulations, including a true and fair view of the financial statements in accordance with the Norwegian Accounting Act and accounting standards and practices generally accepted in Norway, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern. The financial statements use the going concern basis of accounting insofar as it is not likely that the enterprise will cease operations.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with laws, regulations, and auditing standards and practices generally accepted in Norway, including ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with laws, regulations, and auditing standards and practices generally accepted in Norway, including ISAs, we exercise professional judgment and maintain professional scepticism throughout the audit. We also:

- identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error. We design and perform audit procedures responsive to those risks, and obtain audit

KPMG AS, a Norwegian limited liability company and member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative ("KPMG International"), a Swiss entity.

Statsautoriserte revisorer - medlemmer av Den norske Revisorforening

Offices in:

Oslo	Elverum	Mo i Rana	Stord
Ållå	Finnsnes	Molde	Straume
Arendal	Hamar	Skien	Tromsø
Bergen	Haugesund	Sandefjord	Trondheim
Bodo	Knarvik	Sandnessjøen	Tynset
Drammen	Kristiansand	Stavanger	Ålesund

Pennco Dokumentnøkket: XM57D-UOUVZ-2UXWZ-8E85H-DUSAD-7PT74



Promenaden NSG 13 AS

evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

- obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control.
- evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.
- evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves a true and fair view.

We communicate with the Board of Directors regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Report on Other Legal and Regulatory Requirements

Opinion on Registration and Documentation

Based on our audit of the financial statements as described above, and control procedures we have considered necessary in accordance with the International Standard on Assurance Engagements (ISAE) 3000, *Assurance Engagements Other than Audits or Reviews of Historical Financial Information*, it is our opinion that management has fulfilled its duty to produce a proper and clearly set out registration and documentation of the Company's accounting information in accordance with the law and bookkeeping standards and practices generally accepted in Norway.

Oslo, 10 June 2021
KPMG AS

Ole Christian Fongaard
State Authorised Public Accountant
(This document is signed electronically)

Penneo Dokumentnr: XM57D-UOUVZ-2UXWZ-8E85H-DUSAD-7PT74



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Ole Christian Fongaard

Partner

På vegne av: KPMG AS

Serienummer: 9578-5997-4-274114

IP: 80.232.xxx.xxx

2021-06-10 12:44:39Z



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0306 Oslo

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Fax
Internet www.kpmg.no
Enterprise 935 174 627 MVA

To the General Meeting of Promenaden NSG 13 AS

Independent auditor's report

Report on the Audit of the Financial Statements

Opinion

We have audited the financial statements of Promenaden NSG 13 AS showing a profit of NOK 4 784 279. The financial statements comprise the balance sheet as at 31 December 2020, the income statement for the year then ended, and notes to the financial statements, including a summary of significant accounting policies.

In our opinion, the accompanying financial statements are prepared in accordance with law and regulations and give a true and fair view of the financial position of the Company as at 31 December 2020, and its financial performance for the year then ended in accordance with the Norwegian Accounting Act and accounting standards and practices generally accepted in Norway.

Basis for Opinion

We conducted our audit in accordance with laws, regulations, and auditing standards and practices generally accepted in Norway, including International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Financial Statements* section of our report. We are independent of the Company as required by laws and regulations, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Responsibilities of the Board of Directors for the Financial Statements

The Board of Directors (management) is responsible for the preparation in accordance with law and regulations, including a true and fair view of the financial statements in accordance with the Norwegian Accounting Act and accounting standards and practices generally accepted in Norway, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern. The financial statements use the going concern basis of accounting insofar as it is not likely that the enterprise will cease operations.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with laws, regulations, and auditing standards and practices generally accepted in Norway, including ISAs will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with laws, regulations, and auditing standards and practices generally accepted in Norway, including ISAs, we exercise professional judgment and maintain professional scepticism throughout the audit. We also:

- identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error. We design and perform audit procedures responsive to those risks, and obtain audit

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Statsautoriserte revisorer - medlemmer av Den norske Revisorforening

Offices in:

Oslo	Elverum	Mo i Rana	Stord
Alta	Finnsnes	Molde	Straume
Arendal	Hamar	Skien	Tromsø
Bergen	Haugesund	Sandefjord	Trondheim
Bodo	Knarvik	Sandnessjøen	Tynset
Drammen	Kristiansand	Stavanger	Ålesund

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evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

- obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control.
- evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company to cease to continue as a going concern.
- evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves a true and fair view.

We communicate with the Board of Directors regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Report on Other Legal and Regulatory Requirements

Opinion on Registration and Documentation

Based on our audit of the financial statements as described above, and control procedures we have considered necessary in accordance with the International Standard on Assurance Engagements (*ISAE*) 3000, *Assurance Engagements Other than Audits or Reviews of Historical Financial Information*, it is our opinion that management has fulfilled its duty to produce a proper and clearly set out registration and documentation of the Company's accounting information in accordance with the law and bookkeeping standards and practices generally accepted in Norway.

Oslo, 10 June 2021
KPMG AS

Ole Christian Fongaard
State Authorised Public Accountant
(This document is signed electronically)



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Ole Christian Fongaard

Partner

På vegne av: KPMG AS

Serienummer: 9578-5997-4-274114

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Annual Report 2020

Promenaden Nsg 13 AS

Revenue statement
Balance sheet
Notes to the Accounts

Org.no.: 912 383 385



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Promenaden Nsg 13 AS

Income statement for the year ended 31.12.2020

Operating income and operating expenses	Note	2020	2019
Rental income		28 635 734	28 708 377
Total operating income		28 635 734	28 708 377
Depreciation	2	12 562 451	13 353 818
Other operating expenses	1	6 153 640	6 928 486
Total operating expenses		18 716 091	20 282 304
Operating profit		9 919 643	8 426 073
Financial income and expenses			
Interest income from group companies	3	0	220 480
Other interest income		9 187	8 828
Other financial income		118	0
Interest expense to group companies	3	3 786 915	2 788 921
Other interest expenses		8 341	1 172
Net financial items		-3 785 950	-2 560 785
Result before tax		6 133 692	5 865 288
Tax on ordinary result	5	1 349 413	1 290 920
Ordinary result after tax		4 784 279	4 574 368
Result after tax		4 784 279	4 574 368
Brought forward			
Given intra-group contribution		10 238 453	11 036 566
From share premium reserve		5 454 174	0
Transferred from other equity		0	6 462 198
Total brought forward	6	4 784 279	4 574 368



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Promenaden Nsg 13 AS

Balance sheet for the year ended 31.12.2020

Assets	Note	2020	2019
Fixed assets			
Tangible assets			
Buildings and land		190 030 519	202 517 505
Equipment and other movables		21 650	21 650
Total tangible assets	2	190 052 169	202 539 155
Total fixed assets		190 052 169	202 539 155
Current assets			
Debtors			
Accounts receivable		585 084	347 717
Other short-term receivables		21 391 901	8 583 280
Short-term receivables from group companies	3	8 731 950	9 674 960
Total receivables		30 708 935	18 605 957
Cash and bank deposits		837	43 900
Total current assets		30 709 772	18 649 857
Total assets		220 761 941	221 189 012



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Promenaden Nsg 13 AS

Balance sheet for the year ended 31.12.2020

Equity and liabilities	Note	2020	2019
Equity			
Paid-up equity			
Share capital	4, 6	108 000	103 200
Share premium reserve	6	141 806 236	97 265 209
Total paid-up equity		141 914 236	97 368 409
Retained earnings			
Other equity	6	6 462 198	6 462 198
Total retained earnings		-6 462 198	-6 462 198
Total equity		135 452 037	90 906 211
Liabilities			
Deferred tax	5	581 038	2 119 395
Total provisions		581 038	2 119 395
Other long-term liabilities			
Liabilities to Group companies	3	67 852 504	109 581 642
Total of other long term liabilities		67 852 504	109 581 642
Current debt			
Accounts payable		70 212	241 570
Public duties payable		0	20 974
Liabilities to Group companies	3	13 126 223	15 416 185
Other current debt		3 679 927	2 903 035
Total current debt		16 876 362	18 581 764
Total liabilities		85 309 904	130 282 801
Total equity and liabilities		220 761 941	221 189 012

Oslo, 08.06.2021

The board of Promenaden Nsg 13 AS

DocuSigned by:

Annette Lund

Annette Eriksrud Lund
Member of the board

DocuSigned by:

Mark Gamble

Mark Peter Gamble
Chairman of the board



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Promenaden Nsg 13 AS

Notes to the financial statements for the year ended 31.12.2020

Accounting principles

The annual accounts have been prepared in accordance with the Accounting Act and Norwegian generally accepted accounting principles.

Taxes

The tax charge in the income statement includes both payable taxes for the period and changes in deferred tax. Deferred tax is calculated at relevant tax rates on the basis of the temporary differences which exist between accounting and tax values, and any carryforward losses for tax purposes at the year-end. Tax enhancing or tax reducing temporary differences, which are reversed or may be reversed in the same period, have been eliminated. The disclosure of deferred tax benefits on net tax reducing differences which have not been eliminated, and carryforward losses, is based on estimated future earnings. Deferred tax and tax benefits which may be shown in the balance sheet are presented net.

Classification of balance sheet items

Assets intended for long term ownership or use have been classified as fixed assets. Fixed assets are stated at acquisition cost, net of accumulated depreciation. The depreciation period depends on the expected useful life of the respective item. The straight-line method of depreciation is applied. Fixed assets are written down to recoverable value in the event of impairment that is not expected to be temporary. The recoverable amount is the higher of net realizable value and value in use.

Current assets and current liabilities include items falling due within one year of the balance sheet date, and items related to the business cycle. Current assets are valued at the lower of cost and net realizable value.

Revenue and expenses

Rental income is recognised on the accruals basis. Operating and interest expenses are also recognised when they are incurred.



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Promenaden Nsg 13 AS

Notes to the financial statements for the year ended 31.12.2020

Note 1 Payroll expenses, numbers of employees, remuneration, loans to employees etc.

The company had no employees in 2020. There have been no directors' fees accrued or paid.
The company is not required to follow the Act on Mandatory Occupational Pensions.

Auditor's fees (ex. VAT)	2020	2019
Audit	11 500	11 000
Other services	14 938	28 894
Total auditor's fees	26 438	39 894

Note 2 Fixed assets

	Buildings
Purchase cost as of 01.01.20	92 693 296
+ Inflow purchased fixed assets	
= Acquisition cost 31.12.20	92 693 296
Accumulated depreciation 31.12.20	10 421 445
= Book value 31.12.20	82 271 851
This year's ordinary depreciations	2 326 873
Economic life	100 years
Depreciation plan	Straight line
	Modifications
Purchase cost as of 01.01.20	121 685 969
+ Inflow purchased fixed assets	
= Acquisition cost 31.12.20	121 685 969
Accumulated depreciation 31.12.20	40 484 687
= Book value 31.12.20	81 201 282
This year's ordinary depreciations	10 235 578
Economic life	25 years
Depreciation plan	Straight line
	Work in progress
Purchase cost as of 01.01.20	8 759 822
+ Inflow purchased fixed assets	75 464
= Acquisition cost 31.12.20	8 835 286
Accumulated depreciation 31.12.20	
= Book value 31.12.20	8 835 286
This year's ordinary depreciations	
Economic life	No depreciation
Depreciation plan	



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Promenaden Nsg 13 AS

Notes to the financial statements for the year ended 31.12.2020

	Land
Purchase cost as of 01.01.20	17 722 100
+ Inflow purchased fixed assets	
= Acquisition cost 31.12.20	17 722 100
Accumulated depreciation 31.12.20	
= Book value 31.12.20	17 722 100
This year's ordinary depreciations	
Economic life	No depreciation
Depreciation plan	

	Other non-deprec. assets
Purchase cost as of 01.01.20	21 650
+ Inflow purchased fixed assets	
= Acquisition cost 31.12.20	21 650
Accumulated depreciation 31.12.20	
= Book value 31.12.20	21 650
This year's ordinary depreciations	
Economic life	No depreciation
Depreciation plan	

	Total
Purchase cost as of 01.01.20	240 882 837
+ Inflow purchased fixed assets	75 464
= Acquisition cost 31.12.20	240 958 301
Accumulated depreciation 31.12.20	50 906 132
= Book value 31.12.20	190 052 169
This year's ordinary depreciations	12 562 451



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Promenaden Nsg 13 AS

Notes to the financial statements for the year ended 31.12.2020

Note 3 Liabilities / assets pledged as security, guarantees etc.

	2020	2019
Long term liabilities to Group companies	57 468 557	109 581 642
Short term liabilities to Group companies	13 126 223	15 416 185
Short term receivables from Group companies	21 170 125	9 674 960

The company's property is used as security for a loan of NOK 1 825 000 000 owned by Group company Promenaden High Street AS to its bank. The security is limited at a value of NOK 170 000 000

The net book value of assets pledge as security is NOK 190 052 169.

The company has access to Promenaden Property group cash pool. The net balance of the cash pool cannot be negative. Each company in the cash pool has access to an overdraft facility. Any positive cash balance accruing to companies in the cash pool arrangement are used as security for overdrawn positions.

Note 4 Share capital, shareholders etc.

The company's share capital is NOK 103 200 consisting of 2 400 shares each with a par value of NOK 43

Company shareholders:	Ownership (%)	Numbers of shares
Promenaden High Street AS	100 %	2 400

Consolidated financial statements have been prepared by MARK Tomahawk AS.
These are available at the company's premises at Nedre Slottsgate 8, 0157 Oslo.



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Promenaden Nsg 13 AS

Notes to the financial statements for the year ended 31.12.2020

Note 5 Tax

This year's tax expense	2020	2019
Entered tax on ordinary profit/loss:		
Payable tax	2 887 770	2 971 852
Changes in deferred tax	-1 538 357	-1 680 932
Tax expense on ordinary profit/loss	1 349 413	1 290 920
Taxable income:		
Ordinary result before tax	6 133 692	5 865 288
Permanent differences	0	2 530
Changes in temporary differences	6 992 531	7 640 600
Provided intra-group contribution	-13 126 223	-13 508 418
Taxable income	0	0
Payable tax in the balance:		
Payable tax on this year's result	2 887 769	2 174 468
Payable tax on provided Group contribution	-2 887 769	-2 174 468
Total payable tax in the balance	0	0
Calculation of effective tax rate		
Profit before tax	6 133 692	5 865 288
Calculated tax on profit before tax	1 349 412	1 290 363
Tax effect of permanent differences	0	557
Total	1 349 412	1 290 920
Effective tax rate	22,0 %	22,0 %

The tax effect of temporary differences that has formed the basis for deferred tax and deferred tax advantages, specified on type of temporary differences

	2020	2019	Difference
Tangible assets	2 641 082	9 757 537	7 116 455
Accounts receivable	0	-123 924	-123 924
Total	2 641 082	9 633 613	6 992 531
Basis for deferred tax	2 641 082	9 633 613	6 992 531
Deferred tax (22 %)	581 038	2 119 395	1 538 357



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Promenaden Nsg 13 AS

Notes to the financial statements for the year ended 31.12.2020

Note 6 Shareholders' equity

	Share capital	Share premium	Other equity	Total
Equity 01.01	103 200	97 265 209	-6 462 198	90 906 211
Share capital increase	4 800	49 995 200		50 000 000
Group contribution		-10 238 453	0	-10 238 453
Profit for the year		4 784 279	0	4 784 279
Equity 31.12	108 000	141 806 236	-6 462 198	135 452 037

Note 7 Continued operations / events after the balance sheet date

The World Health Organization declared corona outbreaks a global pandemic on March 11, 2020. The authorities have implemented comprehensive measures to prevent the spread.

At the same time, the authorities have implemented cost- and liquidity-saving measures to alleviate business and employees in relation to the challenges that arise as a consequence of the spread of infection measures.

The management of the company has implemented measures to limit the financial consequences on the company's assets, revenues, costs and financing, in order to ensure the company's continued operations.

To prevent the spread and disease-related costs, the management has implemented internal routines in accordance with the authorities' requirements.

As the board assesses the consequences of the situation and the effects of the measures now, there is a basis for basing continued operations on the presentation of the annual accounts for 2020.

In accordance with the Accounting Act § 3-3a, it is confirmed that the preconditions for continued operations are present.



Skattedirektoratet

Saksbehandler Torstein Klindt Helleland	Deres dato 21.01.2016	Vår dato 28.01.2016
Telefon 22078130	Deres referanse Bente Sletten	Vår referanse 2016/52646

BDO AS
Postboks 1704 Vik
0121 OSLO

Tillatelse til å utarbeide årsregnskap og årsberetning på engelsk språk

- Vi viser til deres brev av 21. januar 2016 der det søkes om dispensasjon fra kravet til å utarbeide årsregnskap og årsberetning på norsk språk for følgende selskaper:

Akersgata 16 Eiendom ANS	org. nr. 984 073 968
Akersgata 16 Invest AS	org. nr. 984 074 018
Akersgata 16 Invest KS	org. nr. 984 073 992
Akersgt. 16 AS	org. nr. 970 915 249
AS Kvadraturen Eiendom	org. nr. 960 999 118
Dronningensgate 15 Eiendom AS	org. nr. 992 741 600
Dronningensgate 15 Oslo AS	org. nr. 981 379 195
Eger Magasin råd AS	org. nr. 992 890 304
Egertorget Invest AS	org. nr. 988 989 428
HFS Øvre Slottsgate 18-20 ANS	org. nr. 944 944 176
High Street Shopping AS	org. nr. 996 806 693
HSS Karl Johans gate 16 AS	org. nr. 814 213 102
HSS Steen & Strøm AS	org. nr. 976 770 986
Karl Johan Eiendom 23 B ANS	org. nr. 884 516 072
KD Forvaltning AS	org. nr. 921 781 164
Kirkegaten 20 Eiendom AS	org. nr. 992 741 503
MB Tomahawk AS	org. nr. 915 526 276
Nedre Slottsgate 15 ANS	org. nr. 953 297 361
Nedre Slottsgate 23 Næring AS	org. nr. 879 557 372
Prinsegaarden AS	org. nr. 992 935 464
Prinsen Invest AS	org. nr. 995 654 393
Promenaden Classic AS	org. nr. 915 264 026
Promenaden Drift AS	org. nr. 987 993 502
Promenaden NSG 13 AS	org. nr. 912 383 385
Promenaden Oslo AS	org. nr. 996 338 940
Promenaden Property AS	org. nr. 911 965 658
Promenaden Trend AS	org. nr. 915 263 763
Rosenkrantzgate 11 Eiendom ANS	org. nr. 986 669 140

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Sentralbord
800 80 000
Telefaks
22 17 08 60



Rosenkrantzgate 11 Invest AS	org. nr. 986 709 541
Steen og Strøm Drift AS	org. nr. 963 747 365
Søylen Akersgata 16 AS	org. nr. 989 770 349
Søylen Egertorget AS	org. nr. 990 507 821
Søylen Grensen 17 AS	org. nr. 989 795 244
Søylen Nedre Slottsgate 23 AS	org. nr. 990 041 873
Søylen Øvre Slottsgate 18-20 AS	org. nr. 990 192 715
Tollbugaten 17 Eiendom AS	org. nr. 992 741 562
ØS 10 Eiendom AS	org. nr. 913 494 415
Øvre Slottsgate 18-20 AS	org. nr. 887 872 252

Skattedirektoratet gir på bakgrunn av en konkret helhetsvurdering de ovennevnte selskapene dispensasjon fra kravet til å utarbeide årsregnskap og årsberetning på norsk språk, jf. regnskapsloven § 3-4 tredje ledd. Dispensasjonen forutsetter at opplysningene som vedtaket baserer seg på ikke endres vesentlig.

Kopi av dette brevet må sendes Regnskapsregisteret i Brønnøysund sammen med årsregnskapet. Det påligger den regnskapspliktige å dokumentere ved dette brev at tillatelsen er gitt.

Bakgrunn

Alle selskapene er direkte eller indirekte eiet av MB Tomahawk Lux S.A.R.L. som er hjemmehørende i Luxembourg. Konsernet driver med utvikling og utleie av eiendom i Norge. Eiendomsmassen er næringsseiendom, som omfatter både handels- og kontorlokaler. Arbeidsspråket er engelsk og all konsernrapportering skjer på engelsk. I tillegg er enkelte av styremedlemmene engelskspråklige. Alle sentrale aktører og samarbeidspartnere innen denne bransjen behersker og benytter engelsk. En norsk oversettelse vil kun ha til formål å oppfylle regnskapslovens språkkrav.

Skattedirektoratets vurdering

Etter regnskapsloven § 3-4 tredje ledd skal "årsregnskapet og årsberetningen ... være på norsk. Departementet kan ved ... enkeltvedtak bestemme at årsregnskapet og/eller årsberetningen kan være på et annet språk."

I Ot. prp. nr. 42 (1997-1998) Om lov om årsregnskap m.v., er det uttalt følgende om regnskapslovens formål, jf. pkt. 1.1:

"Regjeringen har som siktemål at regnskapsloven skal bidra til informative regnskaper for ulike grupper av regnskapsbrukere. Regnskapsbrukerne er dels investorer og kreditorer som tilfører kapital til foretakene, og dels andre grupper som har interesse av å vite hvordan foretaket drives, f.eks. de ansatte og lokalsamfunnet. Informasjonen til kapitalmarkedet skal gi grunnlag for riktig prising av finansielle objekter. Riktig prisdannelse på aksjer er en forutsetning for at ressursbruken i samfunnsøkonomien skal bli best mulig. Gode regnskaper vil også gjøre det vanskeligere for markedsdeltakere å ta ut spekulasjonsgevinster med basis i skjøvt fordelt informasjon."



Det fremgår således at et av hovedformålene med regnskapsloven er å bidra til "*informative regnskaper for ulike grupper av regnskapsbrukere*". Regnskapsbrukere vil omfatte, jf. uttalelsen i proposisjonen, blant andre investorer, kreditorer, ansatte og lokalsamfunnet.

Det er etter Skattedirektoratets vurdering derfor avgjørende ved vurdering av om dispensasjon fra kravet til å utarbeide årsregnskap og/eller årsberetning på norsk kan gis, at det ikke foreligger mulige brukere av regnskapsinformasjon som blir vesentlig berørt negativt ved en eventuell dispensasjon.

Det er særlig hensynet til brukerne av regnskapsinformasjon som skal vurderes ved en dispensasjonssøknad. I denne vurderingen har Skattedirektoratet lagt vekt på at inngår i et utenlandsk konsern. Eierkretsen er begrenset. Arbeidsspråket er engelsk og at all konsernrapportering skjer på engelsk. Videre er det vektlagt at enkelte av styremedlemmene er engelskspråklige.

Vennligst oppgi vår referanse ved henvendelser i saken.

Med hilsen

Rune Tystad
seniorrådgiver
Rettsavdelingen, foretaksskatt
Skattedirektoratet

Torstein Kinden Helleland

Dokumentet er elektronisk godkjent og har derfor ikke håndskrevne signaturer