



ÅRSREGNSKAPET FOR REGNSKAPSÅRET 2024 - GENERELL INFORMASJON

Enheten

Organisasjonsnummer: 927 234 475
Organisasjonsform: Aksjeselskap
Foretaksnavn: SOWRER AS
Forretningsadresse: c/o Kvale Advokatfirma DA
Haakon VIIs gate 10
0161 OSLO

Regnskapsår

Årsregnskapets periode: 01.01.2024 - 31.12.2024

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: Michele Di Minno
Dato for fastsettelse av årsregnskapet: 03.07.2025

Grunnlag for avgivelse

År 2024: Årsregnskapet er elektronisk innlevert
År 2023: Tall er hentet fra elektronisk innlevert årsregnskap fra 2024

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, 09.07.2025



Resultatregnskap

Beløp i: NOK	Note	2024	2023
RESULTATREGNSKAP			
Inntekter			
Revenue	1	42 496 584	127 995 099
Other income	1	1 624 407	6 122 328
Sum inntekter		44 120 991	134 117 427
Kostnader			
External services, Sucontractors and freight		12 829 214	50 607 151
Employee benefits expense	2		1 314 123
Depreciation and amortisation expenses	3	42 728 358	32 433 411
Nedskrivning av varige driftsmidler og immaterielle eiendeler		149 265 880	28 466
Other expenses	2	1 569 961	6 262 921
Sum kostnader		206 393 413	90 646 073
Driftsresultat		-162 272 422	43 471 354
Finansinntekter og finanskostnader			
Annen renteinntekt	4	21 145	13 106
Other financial income	4	13 860 835	16 657 656
Sum finansinntekter		13 881 980	16 670 762
Write-down of long-term investments	4		80 170
Rentekostnad til foretak i samme konsern	4	3 738 247	3 736 684
Annen rentekostnad	4	16 011	30 423
Other financial expenses	4	20 591 054	48 791 368
Sum finanskostnader		24 345 312	52 638 644
Netto finans		-10 463 332	-35 967 882
Resultat før skattekostnad		-172 735 754	7 503 472
Income tax expense	5	-8 306 271	1 660 892
Årsresultat	6	-164 429 483	5 842 580
Årsresultat etter minoritetsinteresser		-164 429 483	5 842 580



Resultatregnskap

Beløp i: NOK	Note	2024	2023
Totalresultat		-164 429 483	5 842 580
Overføringer og disponeringer			
Udekket tap		-164 429 483	5 842 580
Sum overføringer og disponeringer		-164 429 483	5 842 580



Balanse

Beløp i: NOK	Note	2024	2023
BALANSE - EIENDELER			
Anleggsmidler			
Immaterielle eiendeler			
Concessions, patents, licences, trademarks, and similar rights	3		
Utsatt skattefordel	5		
Sum immaterielle eiendeler	3		
Varige driftsmidler			
Buildings and land	3		
Machinery and equipment	3	1	191 994 239
Ships	3		
Equipment and other movables	3		
Sum varige driftsmidler	3	1	191 994 239
Finansielle anleggsmidler			
Other long-term receivables		56 989 918	5 900 000
Sum finansielle anleggsmidler		56 989 918	5 900 000
Sum anleggsmidler		56 989 918	197 894 239
Omløpsmidler			
Varer			
Fordringer			
Accounts receivables		201 856	667 783
Other short-term receivables		33 696 819	243 333
Konsernfordringer	7		27 595 157
Sum fordringer		33 898 675	28 506 273
Bankinnskudd, kontanter og lignende			
Cash and cash equivalents	8	218 623	93 841
Sum bankinnskudd, kontanter og lignende		218 623	93 841
Sum omløpsmidler		34 117 298	28 600 114
SUM EIENDELER		91 107 216	226 494 353



Balanse

Beløp i: NOK	Note	2024	2023
BALANSE - EGENKAPITAL OG GJELD			
Egenkapital			
Innskutt egenkapital			
Share capital	9	90 000	60 000
Beholdning av egne aksjer	9		
Overkurs		111 952 633	52 088 030
Sum innskutt egenkapital		112 042 633	52 148 030
Opptjent egenkapital			
Udekket tap	10	184 957 250	20 527 766
Sum opptjent egenkapital		-184 957 250	-20 527 766
Sum egenkapital	6	-72 914 617	31 620 263
Gjeld			
Langsiktig gjeld			
Utsatt skatt	5		8 306 271
Sum avsetninger for forpliktelser			8 306 271
Annen langsiktig gjeld			
Sum langsiktig gjeld		0	8 306 271
Kortsiktig gjeld			
Leverandørgjeld		44 714 482	14 851 589
Tax payable	5		
Public duties payable			1 120 318
Kortsiktig konserngjeld	7	24 133 006	165 679 050
Other current liabilities		95 174 345	4 916 862
Sum kortsiktig gjeld		164 021 833	186 567 818
Sum gjeld		164 021 833	194 874 089
SUM EGENKAPITAL OG GJELD		91 107 216	226 494 353



Brønnøysundregistrene

ÅRSREGNSKAP FOR REGNSKAPSÅRET 2024 - GENERELL INFORMASJON

Journalnummer: 2025 644698

Enheten

Organisasjonsnummer: 927 234 475
Organisasjonsform: Aksjeselskap
Foretaksnavn: SOWRER AS
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Haakon VIIIs gate 10
0161 OSLO

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årsregnskapet til selskapet: Regnskapslovens alminnelige regler

Årsregnskapet fastsatt av kompetent organ

Bekreftet av representant for selskapet: Michele Di Minno
Dato for fastsettelse av årsregnskapet: 03.07.2025

Revisjon

Årsregnskapet er utarbeidet av ekstern
autorisert regnskapsfører: Ja
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

År 2024: Årsregnskap er elektronisk innlevert.
År 2023: Tall er hentet fra elektronisk innlevert årsregnskap fra 2024.

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Brønnøysundregistrene, 08.07.2025

Brønnøysundregistrene
Postadresse: Postboks 900, 8910 Brønnøysund
Telefon: 75 00 75 00
E-post: firmapost@brreg.no Internett: www.brreg.no
Organisasjonsnummer: 974 760 673



Organisasjonsnr: 927 234 475
SOWRER AS

RESULTATREGNSKAP

Beløp i: NOK	Note	2024	2023
RESULTATREGNSKAP			
Inntekter			
Revenue	1	42 496 584	127 995 099
Other income	1	1 624 407	6 122 328
Sum inntekter		44 120 991	134 117 427
Kostnader			
External services, Subcontractors and freight		12 829 214	50 607 151
Employee benefits expense	2		1 314 123
Depreciation and amortisation expenses	3	42 728 358	32 433 411
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Other expenses	2	1 569 961	6 262 921
Sum kostnader		206 393 413	90 646 073
Driftsresultat		-162 272 422	43 471 354
Finansinntekter og finanskostnader			
Annen renteinntekt	4	21 145	13 106
Other financial income	4	13 860 835	16 657 656
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Annen rentekostnad	4	16 011	30 423
Other financial expenses	4	20 591 054	48 791 368
Sum finanskostnader		24 345 312	52 638 644
Netto finans		-10 463 332	-35 967 882
Resultat før skattekostnad		-172 735 754	7 503 472
Income tax expense	5	-8 306 271	1 660 892
Årsresultat	6	-164 429 483	5 842 580
Årsresultat etter minoritetsinteresser		-164 429 483	5 842 580
Totalresultat		-164 429 483	5 842 580
Overføringer og disponeringer			
Udekket tap		-164 429 483	5 842 580



Sum overføringer og
disponeringer

-164 429 483

5 842 580



Organisasjonsnr: 927 234 475
SOWRER AS

BALANSE

Beløp i: NOK	Note	2024	2023
BALANSE - EIENDELER			
Anleggsmidler			
Immaterielle eiendeler			
Concessions, patents, licences, trademarks, and similar rights	3		
Utsatt skattefordel	5		
Sum immaterielle eiendeler	3		
Varige driftsmidler			
Buildings and land	3		
Machinery and equipment	3	1	191 994 239
Ships	3		
Equipment and other movables	3		
Sum varige driftsmidler	3	1	191 994 239
Finansielle anleggsmidler			
Other long-term receivables		56 989 918	5 900 000
Sum finansielle anleggsmidler		56 989 918	5 900 000
Sum anleggsmidler		56 989 918	197 894 239
Omløpsmidler			
Varer			
Fordringer			
Accounts receivables		201 856	667 783
Other short-term receivables		33 696 819	243 333
Konsernfordringer	7		27 595 157
Sum fordringer		33 898 675	28 506 273
Bankinnskudd, kontanter og lignende			
Cash and cash equivalents	8	218 623	93 841
Sum bankinnskudd, kontanter og lignende		218 623	93 841
Sum omløpsmidler		34 117 298	28 600 114
SUM EIENDELER		91 107 216	226 494 353

BALANSE - EGENKAPITAL OG GJELD

Egenkapital



Innskutt egenkapital			
Share capital	9	90 000	60 000
Beholdning av egne aksjer	9		
Overkurs		111 952 633	52 088 030
Sum innskutt egenkapital		112 042 633	52 148 030
Opptjent egenkapital			
Udekket tap	10	184 957 250	20 527 766
Sum opptjent egenkapital		-184 957 250	-20 527 766
Sum egenkapital	6	-72 914 617	31 620 263
Gjeld			
Langsiktig gjeld			
Utsatt skatt	5		8 306 271
Sum avsetninger for forpliktelseser			8 306 271
Annen langsiktig gjeld			
Sum langsiktig gjeld		0	8 306 271
Kortsiktig gjeld			
Leverandørgjeld		44 714 482	14 851 589
Tax payable	5		
Public duties payable			1 120 318
Kortsiktig konserngjeld	7	24 133 006	165 679 050
Other current liabilities		95 174 345	4 916 862
Sum kortsiktig gjeld		164 021 833	186 567 818
Sum gjeld		164 021 833	194 874 089
SUM EGENKAPITAL OG GJELD		91 107 216	226 494 353



Organisasjonsnr: 927 234 475
SOWRER AS

NOTEOPPLYSNINGER - SELSKAP - alle poster oppgitt i hele tall

Note

Antall årsverk i regnskapsåret
0.00

Sum Beløp

Balanseført verdi 31.12. Varige driftsmidler Immaterielle eiend.

Konsernregnskap

Morselskapet sitt navn

Forretningskontor for morselskapet

Begrunnelse for at datterselskap er utelatt fra konsolideringen

Samlet beløp - tilknyttet selskap Årets Fjorårets

Samlet beløp - foretak i samme konsern Årets Fjorårets

Samlet beløp - foretak i samme konsern Årets Fjorårets

Samlet beløp - felles kontrollert virksomhet Årets Fjorårets

Pantstillelse Beløp

Beholdning av egne aksjer Antall Pålydende Andel av aksjek.



Annual Report 2024

Sowrer AS

Revenue statement
Balance sheet
Notes to the Accounts



Org.no.: 927 234 475



REVENUE STATEMENT

SOWRER AS

OPERATING INCOME AND OPERATING EXPENSES	Note	2024	2023
Revenue	1	42 496 584	127 995 099
Other income	1	1 624 407	6 122 328
Total income		44 120 991	134 117 427
External services, Sucontracters and freight		12 829 214	50 607 151
Employee benefits expense	2	0	1 314 123
Depreciation and amortisation expenses	3	42 728 358	32 433 411
Impairment loss		149 265 880	28 466
Other expenses	2	1 569 961	6 262 921
Total expenses		206 393 413	90 646 073
Operating profit		-162 272 422	43 471 354
FINANCIAL INCOME AND EXPENSES			
Other interest income	4	21 145	13 106
Other financial income	4	13 860 835	16 657 656
Write-down of long-term investments	4	0	80 170
Interest expense to group companies	4	3 738 247	3 736 684
Other interest expenses	4	16 011	30 423
Other financial expenses	4	20 591 054	48 791 368
Net financial items		-10 463 332	-35 967 882
Net profit before tax		-172 735 754	7 503 472
Income tax expense	5	-8 306 271	1 660 892
Net profit after tax		-164 429 483	5 842 580
EXTRAORDINARY INCOME AND EXPENSES			
Net profit or loss	6	-164 429 483	5 842 580
ATTRIBUTABLE TO			
Loss brought forward		0	5 842 580
Loss brought forward		164 429 483	0
Total		-164 429 483	5 842 580



BALANCE SHEET

SOWRER AS

ASSETS	Note	2024	2023
NON-CURRENT ASSETS			
PROPERTY, PLANT AND EQUIPMENT			
Machinery and equipment	3	1	191 994 239
Total property, plant and equipment	3	1	191 994 239
NON-CURRENT FINANCIAL ASSETS			
Other long-term receivables		56 989 918	5 900 000
Total non-current financial assets		56 989 918	5 900 000
Total non-current assets		56 989 918	197 894 239
CURRENT ASSETS			
DEBTORS			
Accounts receivables		201 856	667 783
Other short-term receivables		33 696 819	243 333
Receivables from group companies	7	0	27 595 157
Total receivables		33 898 675	28 506 273
Cash and cash equivalents	8	218 623	93 841
Total current assets		34 117 298	28 600 114
Total assets		91 107 216	226 494 353



BALANCE SHEET

SOWRER AS

EQUITY AND LIABILITIES	Note	2024	2023
EQUITY			
PAID-IN CAPITAL			
Share capital	9	90 000	60 000
Share premium reserve		111 952 633	52 088 030
Total paid-up equity		112 042 633	52 148 030
RETAINED EARNINGS			
Uncovered loss	10	-184 957 250	-20 527 766
Total retained earnings		-184 957 250	-20 527 766
Total equity	6	-72 914 617	31 620 263
LIABILITIES			
PROVISIONS			
Deferred tax	5	0	8 306 271
Total provisions		0	8 306 271
OTHER NON-CURRENT LIABILITIES			
CURRENT LIABILITIES			
Trade payables		44 714 482	14 851 589
Public duties payable		0	1 120 318
Liabilities to group companies	7	24 133 006	165 679 050
Other current liabilities		95 174 345	4 916 862
Total current liabilities		164 021 833	186 567 818
Total liabilities		164 021 833	194 874 089
Total equity and liabilities		91 107 216	226 494 353

03.07.2025

The board of Sowrer AS

Michele Di Minno
chairman of the board



SOWRER AS

927 234 475

Accounting principles

The annual accounts have been prepared in conformity with the provisions of the Accounting Act and good accounting practice for small companies.

USE OF ESTIMATES

In the preparation of the annual accounts estimates and assumptions have been made that have affected the profit and loss account and the valuation of assets and liabilities, and uncertain assets and liabilities on the balance sheet date in accordance with generally accepted accounting practice. Areas which to a large extent contain such subjective evaluations, a high degree of complexity, or areas where the assumptions and estimates are material for the annual accounts, are described in the notes.

REVENUES

Income from the sale of goods is recognised on the date of delivery. Services are posted as income as they are delivered. Income from the sale of services and long-term manufacturing projects (construction contracts) are posted to the profit and loss account in line with the project's degree of completion, when the outcome of the transaction can be estimated in a reliable manner. When the transaction's outcome cannot be estimated reliably, only income corresponding to a projects' incurred costs can be posted as revenue. At the time when it is identified that the project will give a negative result, the estimated loss on the contract is posted in full to the profit and loss account.

TAX

The tax charge in the profit and loss account consists of tax payable for the period and the change in deferred tax. Deferred tax is calculated at the tax rate at 22 % on the basis of tax-reducing and tax-increasing temporary differences that exist between accounting and tax values, and the tax loss carried forward at the end of the accounting year. Tax-increasing and tax-reducing temporary differences that reverse or may reverse in the same period are set off and entered net. The net deferred tax receivable is entered on the balance sheet to the extent that it is likely that it can be utilised.

CLASSIFICATION AND VALUATION OF FIXED ASSETS

Fixed assets consist of assets intended for long-term ownership and use. Fixed assets are valued at acquisition cost less depreciation and write-downs. Long-term liabilities are entered on the balance sheet at the nominal amount at the time of the transaction.

Plant and equipment is capitalised and appreciated over the economic lifetime of the asset. Significant items of plant and equipment that consist of several material components with different lifetimes are broken down in order to establish different depreciation periods for the different components. Direct maintenance of plant and equipment is expensed on an ongoing basis under operating costs, while additions or improvements are added to the asset's cost price and depreciated in line with the asset. Plant and equipment is written down to the recoverable amount in the event of a fall in value that is not expected to be temporary. The recoverable amount is the higher of the net sales value and the value in use. Value in use is the present value of future cash flows related to the asset. The write-down is reversed when the basis for the write-down is no longer present.

CLASSIFICATION AND VALUATION OF CURRENT ASSETS

Current assets and short-term liabilities consist normally of items that fall due for payment within one year of the balance sheet date, as well as items related to the stock cycle. Current assets are valued at the lower of acquisition cost and fair value. Short-term liabilities are entered on the balance sheet at the nominal amount at the time of the transaction.

RECEIVABLES

Receivables from customers and other receivables are entered at par value after deducting a provision for

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expected losses. The provision for losses is made on the basis of an individual assessment of the respective receivables. In addition an unspecified provision is made to cover expected losses on claims in respect of customer receivables.

Note 1 Sales income

	2024	2023
By business area		
Data center services	42 496 584	127 995 099
Rental income from fixed assets	1 624 407	5 400 388
Income from sale of fixed assets	0	145 024
Other Revenue	0	576 916
Total	44 120 991	134 117 427
Geographic breakdown		
Norway	1 624 407	6 122 328
Export	42 496 584	127 995 099
Total	44 120 991	134 117 427

Note 2 Salary costs and benefits, remuneration to the chief executive, board and auditor

SALARY COSTS

	2024	2023
Salaries	0	1 099 509
Employment tax	0	167 665
Other benefits	0	46 950
Total	0	1 314 123

In 2024 the company employed 0 man-years.

AUDITOR

Audit fees expensed for 2024 amount to NOK 164 853 ex. vat.



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Note 3 Non-current assets

	Plant and machinery	Fixtures and fittings	Total
Purchase cost as of 01.01.24	226 815 005	60 272	226 875 277
= Acquisition cost 31.12.24	226 815 005	60 272	226 875 277
Accumulated depreciation 31.12.24	77 549 125	31 806	77 580 931
+ Accumulated write-down 31.12.24	149 265 880	28 466	149 294 346
= Depreciation and down-wr. as of 31.12.24	226 815 005	60 272	226 875 277
= Book value 31.12.24	0	0	0
This year's ordinary depreciations	42 728 358		42 728 358
This year's write-downs	149 265 880		149 265 880
Economic life	5-10 years	3 years	

Note 4 Items that are aggregated in the accounts

	2024	2023
Financial income		
Other interest income	21 145	13 106
Other financial income (agio)	13 849 390	16 657 656
Total financial income	13 870 535	16 670 762
Financial costs		
Write-down of financial assets	0	80 170
Interest costs to companies in the same group	3 738 247	3 736 684
Other interest costs	16 011	30 423
Other financial costs (disagio)	20 591 054	46 735 894
Total financial costs	24 345 312	50 583 170

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Note 5 Tax

This year's tax expense	2024	2023
Entered tax on ordinary profit/loss:		
Payable tax	0	0
Changes in deferred tax	-8 306 271	1 660 892
Tax expense on ordinary profit/loss	-8 306 271	1 660 892
Taxable income:		
Result before tax	-172 735 754	7 503 472
Permanent differences	123 083	46 039
Changes in temporary differences	161 688 511	-5 559 588
Received intra-group contribution	0	48 175 155
Cut interest deduction	-2 050 567	-8 855 958
Allocation of loss to be brought forward	0	-41 380 738
Taxable income	-12 974 728	-71 619
Payable tax in the balance:		
Payable tax on this year's result	0	-10 598 534
Payable tax on received Group contribution	0	10 598 534
Total payable tax in the balance	0	0
Calculation of effective tax rate		
Profit before tax	-172 735 754	7 503 472
Calculated tax on profit before tax	-38 001 866	1 650 764
Tax effect of permanent differences	27 078	10 128
Total	-37 974 788	1 660 892
Effective tax rate	22,0 %	22,1 %

The tax effect of temporary differences and loss for to be carried forward that has formed the basis for deferred tax and deferred tax advantages, specified on type of temporary differences

	2024	2023	Difference
Tangible assets	-121 345 578	40 322 889	161 668 467
Profit and loss account	80 175	100 218	20 044
Total	-121 265 403	40 423 108	161 688 511
Accumulated loss to be brought forward	-13 046 347	-71 619	12 974 728
Cut interest deduction	-545 144	-2 595 711	-2 050 567
Not included in the deferred tax calculation	134 856 894	0	-134 856 894
Basis for deferred tax	0	37 755 777	37 755 777
Deferred tax (22 %)	0	8 306 271	8 306 271

Deferred tax not included in the balance sheet.

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Note 6 Equity capital

	Share capital	Share premium	Uncovered losses	Total equity capital
Pr. 31.12.2023	60 000	52 088 030	-20 527 766	31 620 263
Result of the year			-164 429 483	-164 429 483
Capital increase	30 000	59 864 603		59 894 603
Pr 31.12.2024	90 000	111 952 633	-184 957 250	-72 914 617

Note 7 Inter-company items between companies in the same group

	2024	2023
Receivables		
Other short-term receivables within the group	0	27 595 157
Total	0	27 595 157
Liabilities		
Other short-term liabilities within the group	24 133 006	165 679 050
Total	24 133 006	165 679 050

Note 8 Bank deposits

Funds standing on the tax deduction account (restricted funds) are NOK 0.

Note 9 Shareholders

THE SHARE CAPITAL IN SOWRER AS AS OF 31.12 CONSISTS OF:

	Total	Face value	Entered
Ordinary shares	3 000	30,0	90 000
Total	3 000		90 000

OWNERSHIP STRUCTURE

Shareholders in % at year end:

	Ordinary	Owner interest	Share of votes
Cowa	3 000	100,0	100,0



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Note 10 Going concern

The result for 2024 shows a loss of NOK-164 429 483 after tax. The amount of uncovered loss is connected to a one-time loss in relation to cancellation of the Company's main supplier and customer agreements. The company has in 2025 disposed of all its fixed assets and will in the future focus on supporting its sister-companies in their operations.

100% of Other current liabilities in the balance sheet expected credit notes issued to group companies that will be issued in 2025. The debt created will be converted into equity before the end Q3 2025, which will ensure positive equity before the end of 2025.

On the basis of the above, it is the board's opinion that the going concern assumptions are met.

SOWRER AS

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To the General Meeting of
Sowrer AS

Independent Auditor's Report

Opinion

We have audited the financial statements of Sowrer AS (the Company) showing a loss of NOK 164 429 483. The financial statements comprise the balance sheet as at 31 December 2024, 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 financial statements comply with applicable statutory requirements, and
- the financial statements give a true and fair view of the financial position of the Company as at 31 December 2024, 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 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 relevant laws and regulations in Norway and the International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code), 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.

Other Matters

The Company's financial statements have been submitted after the expiry of the statutory time limit for preparation of financial statements.

Responsibilities of the Board of Directors for the Financial Statements

The Board of Directors (management) is responsible for the preparation of financial statements that give a true and fair view 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 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 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 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.

Oslo, 3 July 2025

MOORE AS

Bjørn M. Nausthøller
State Authorised Public Accountant



Skatteetaten

Vår dato 20.07.2022	Din/Deres dato 27.06.2022	Saksbehandler Vibeke Horne
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SOWRER AS
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Att. Reidun Merethe Horn

Tillatelse til å utarbeide årsregnskap og årsberetning på engelsk for Sower AS, org.nr. 927 234 475

Vi viser til deres brev av 27. juni 2022 der det søkes om dispensasjon fra kravet til å utarbeide årsregnskap og årsberetning på norsk for Sower AS. Søknaden ble sendt til Skattedirektoratet. Skattedirektoratets myndighet til å treffe enkeltvedtak etter regnskapsloven § 3-4 tredje ledd ble delegert til skattekontoret med virkning fra 1. juni 2019.

Skattekontoret gir på bakgrunn av en konkret helhetsvurdering Sower AS dispensasjon fra kravet til å utarbeide årsregnskap og årsberetning på norsk, jf. regnskapsloven § 3-4 tredje ledd. Dispensasjonen gjelder så lenge opplysningene som danner grunnlaget for vedtaket ikke endres vesentlig.

Kopi av dette brevet må sendes til Regnskapsregisteret i Brønnøysund sammen med årsregnskapet. Den regnskapspliktige må selv dokumentere ved dette brev at tillatelse er gitt.

Bakgrunn

Sower AS er eid av et utenlandsk selskap. Selskapet driver virksomhet innen databehandling, datalagring og tilknyttede tjenester. Alle rapportering og kommunikasjon foregår på engelsk. Styrets leder er ikke norsk.

Skattekontorets 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 mv., 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 skjevt 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 skattekontorets 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 skattekontoret lagt særlig vekt på at selskapet er direkte eid av et utenlandsk selskap. Videre er det vektlagt at selskapet driver virksomhet i en bransje der alle sentrale aktører behersker og benytter engelsk.

Vennligst oppgi vår referanse ved henvendelse i saken.

Med hilsen

Vibeke Horne
rådgiver
Brukerdialog, brukerkontakt
Skatteetaten

Dokumentet er elektronisk godkjent og har derfor ikke håndskrevne signaturer.