

Summary and Key Points:

### **Criminal complaint against Norges Bank and others**

**The Palestine Committee in Norway has submitted a comprehensive complaint to the National Public Prosecutor's Office for Combating Organized and Other Serious Crime (NAST).**

The complaint targets Norges Bank and Ida Wolden Bache, Norges Bank Investment Management (NBIM) and Nicolai Tangen, as well as the Ministry of Finance and Finance Ministers Trygve Slagsvold Vedum and Jens Stoltenberg. All are accused of complicity in the State of Israel's war crimes, crimes against humanity and genocide in Gaza, and complicity in illegal settlements under the illegal occupation of Palestine.

### **Main allegations in the complaint**

- NBIM and Norges Bank have invested the Oil Fund in numerous companies that:
  - deliver weapons, military equipment and services used in Israel's warfare, or
  - contribute to maintaining illegal settlements and the occupation of Palestine.
- The investments have strengthened Israel's ability to commit genocide, crimes against humanity and war crimes. This is covered by Norwegian law, Chapter 16 of the Penal Code.
- The Ministry of Finance, as the owner of the fund, is accused of having breached its ownership and control responsibility by not intervening - especially after international law assessments from the ICJ, the UN and Norwegian authorities made the risk clear.
- The three companies and the four individuals are believed to be the most responsible who can be held criminally liable, for complicity (Penal Code Chapter 16, cf. § 15) and/or for failure to prevent (Penal Code § 109).

The complaint particularly highlights weapons companies that contribute to Israel's genocide, companies that contribute to the illegal occupation and several Israeli actors. The common denominator is that the companies primarily:

- have delivered weapons, spare parts or military equipment used by the Israeli war machine as part of illegal actions during the warfare in Gaza, or
- have participated in the operation and expansion of infrastructure that maintains illegal settlements or have sold goods or services that make it easier or more advantageous to be an illegal settler.

### **International law and criminal law basis**

The complaint is based among other things on:

- ICJ's advisory opinions on the illegal occupation, the illegal settlements and the duty of action of third states.
- ICJ's assessment that it is plausible that Israel's actions in Gaza constitute genocide.
- Genocide Convention Article 1 and Geneva Conventions Article 1,
- Statute of the International Criminal Court Articles 6, 7 and 8.
- Norwegian Penal Code §§ 101–109, § 15 on complicity and §§ 27-28 on companies.

The complainant particularly emphasizes that:

- NBIM, the Ethics Council, Norges Bank and the Ministry of Finance have over a long time been made aware that several companies may be complicit in genocide or directly contributing to the illegal occupation of Palestine. We will particularly point to *Don't buy into Occupation's* annual reports, statements to the Finance Committee of Norway's Parliament, statements by UN bodies and the UN database of companies contributing to the occupation, and the UN Special Rapporteur for the Palestinian territories, Francesca Albanese's reports and letters to the finance minister.
- The Oil Fund's ownership holdings in several such companies have increased since 2023.
- Norwegian authorities have publicly advised Norwegian companies against doing anything that could contribute to the occupation and the illegal settlements.
- Several of the companies are UN blacklisted.

This is presented as a basis for the responsible parties having acted intentionally or with gross negligence.

**The Public Prosecution Service, through NAST, is asked to investigate:**

- Whether the Oil Fund's investments or continued ownership in certain companies have resulted in complicity in genocide, crimes against humanity and/or war crimes, as well as contribution to the illegal occupation of Palestine.
- Whether there is a basis for corporate criminal liability.
- Whether individuals in leading positions can be personally prosecuted under Penal Code Chapter 16, cf. § 15 and/or § 109.

**The Palestine Committee therefore requests investigation of both the companies and the named leaders.**

We further refer to the following documents (in Norwegian)

- Complete complaint submitted to the public prosecutor
- Documentation of contribution to the illegal occupation of Palestine and the ongoing genocide in Gaza for some of the companies in the Oil Fund's portfolio
- Professor Terje Einarsen's report on the Oil Fund's possible liability for complicity in criminal offenses.

*Translation from the Norwegian (Bokmål) original with the use of Thaura AI and human quality assurance*