

# Annual Report 2024



# Conclusion

Key figures	3
The Bank's Board of Directors	4
The Bank's Management Group	5
Remarks from the CEO	6
Retail market	8
Corporate market and business sector in Helgeland	9
Financial performance 2024	11
Sustainability report for SpareBank 1 Helgeland	13
Board of Directors' Report and Annual Financial Statements 2024	63

# Key figures



Net income  
before tax  
**NOK 743 MILLION**



Return on equity  
**11.8%**



12-month lending  
growth  
**5.8%**



12-month deposit  
growth  
**1.6%**



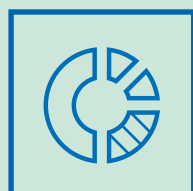
Total assets  
**NOK 39.0 BILLION**  
**NOK**



Solvency ratio  
**17.8%**  
Common Equity Tier  
1 capital ratio



Green asset ratio  
(GAR)  
**7.3%**



Gender distribution among  
the Management Group  
and Board of Directors %  
(women/men)  
**50% / 50%**



The Transparency  
Act  
**62**  
Supplier due diligence  
processes completed

# The Bank's Board of Directors



**Bjørn Krane**  
**CHAIR**

Board member since 2020.



**Siw Moxness**  
**VICE CHAIR**

Board member since 2019.



**Geir Andreassen**  
**BOARD MEMBER**

Board member since 2024.



**Marianne Terese Steinmo**  
**BOARD MEMBER**

Board member since 2016  
and deputy member from 2015-2016.



**Yngve Myhre**  
**BOARD MEMBER**

Board member since 2024.



**Ann-Helen Baadstrand**  
**BOARD MEMBER**

Board member since 2022.



**Solrun Johansen**  
**BOARD MEMBER AND**  
**EMPLOYEE-ELECTED REPRESENTATIVE**

Board member since 2022.



**Kenneth Normann**  
**BOARD MEMBER AND**  
**EMPLOYEE-ELECTED REPRESENTATIVE**

Board member since 2022.



# The Bank's Management Group



Hanne Nordgaard  
**CHIEF EXECUTIVE OFFICER**

Appointed in 2017.



Anne Ekroll  
**CHIEF FINANCE OFFICER**

Appointed in 1994.



Bjørn Tore Brønlund  
**CORPORATE MARKET DIRECTOR**

Appointed in 1993.



Dag-Hugo Heimstad  
**RETAIL MARKET DIRECTOR**

Appointed in 2006.



Cecilie Johnsen  
**RISK MANAGEMENT DIRECTOR**

Appointed from 2023.



Øyvind Karlsen  
**BUSINESS MANAGEMENT DIRECTOR**

Appointed in 2013.



## Remarks from the CEO

We live in challenging times. 2024 was a year in which the wars in Ukraine and Gaza coloured the news, along with stories about climate change in the form of global warming and extreme weather events such as floods, avalanches, heatwaves and forest fires. Despite economic uncertainty at the beginning of the year, the stock market saw significant growth in 2024. Advances in AI continued to dominate technology developments in the financial sector in 2024, and in Norway the sector was also characterised by a number of actual mergers and announcements concerning major bank mergers.

SpareBank 1 Helgeland enjoyed a stable financial performance in 2024. The Bank focused on improving its digital presence and customer satisfaction. It also worked on improving its risk management and took a number of steps to manage credit risk and operational risk. Moreover, the Bank implemented several measures designed to increase customer satisfaction, including improving its product range and pricing. In addition to this, more customers are using digital services, which has helped to improve operational efficiency

The Bank made an important strategic choice in 2020 and became part of the SpareBank 1 Alliance. The aim was to ensure that the Bank will remain just as independent in the future. The decision to join the Alliance stemmed from changes in the banking industry's framework conditions. The regulatory requirements imposed on banking operations in Europe and Norway are still being tightened as regards both solvency and sustainability. Digitalisation and automation of banking services are necessitating major investments in IT infrastructure. Competition for customers is intensifying, and local banks must



deliver customer experiences and conditions which are at least on a par with both national and international competitors. The responsibilities of banks to prevent financial crime such as money laundering and terrorist financing, mitigate climate risk and promote sustainable growth in the economy are becoming increasingly important issues. Size matters when it comes to competitiveness in the banking industry, and a close and binding partnership between a number of banks will offer customers a better solution. Sustainability is an area within which we as a local bank have taken great strides forward this year, both on our own behalf and on behalf of businesses in Helgeland, and in order to help achieve the EU's sustainability objectives. This work will be stepped up over the coming years.

The Bank's vision remains unchanged, SpareBank 1 Helgeland shall be a driving force for growth in Helgeland. As the local bank for the whole of Helgeland, the Bank is interested in the driving forces behind growth, where cooperation is absolutely vital. We believe in cooperation between people, between businesses, between the urban centres of Helgeland, between rural and urban areas, and between municipalities and businesses. It is through cooperation that we can find good solutions. Thus, an important measure in the Helgeland Pledge is precisely to create meeting places in order to bring about future new commercial development and offshoots.

Access to labour is one of the most important factors for successfully establishing companies and the development we want to see in Helgeland. There is a shortage of labour in both the private and public sectors across Helgeland, and we are now even more dependent than ever before on recruiting new people to Helgeland. We need people who want to move to Helgeland and settle here with their family. The inward migration of people will be decisive in determining whether Helgeland can be successful going forward.

SpareBank 1 Helgeland returns a great deal of value back to the local community through dividends on our community-owned capital and dividends for our local equity certificate holders. Dividends on the community-owned capital in the form of donations to sustainable and good causes in sport, culture, knowledge and societal development. This benefits all 18 municipalities and provides a driver for growth in volunteerism, well-being and quality of life in Helgeland. Well-being and quality of life will not necessarily lead to more people moving to Helgeland, but they will undoubtedly result in more people choosing to stay. That said, we are consciously working to strengthen input factors which will also help to raise the profile of Helgeland outside the region's borders, and we will continue to do so. A more detailed description of the Bank's donations and sponsorship activities is available as part of the Bank's sustainability report.

Growth is generated when the business sector dares to take risks, invest and innovate. This requires secure and stable framework conditions, in addition to access to customers and markets to sell what is produced, access to sufficient labour with the right skills and access to sustainable solutions and capital. Despite delays to and postponements of investments in the region, the Bank still believes that these investments are coming and that they will result in positive developments in the region. The establishment of new companies triggers optimism and, historically, we know that activity breeds activity and that this will benefit the whole of Helgeland over time.

Local savings banks fulfil a very special role as regards capital for local business sectors. Local savings bank lives off, and alongside, local business communities. While international and national banks often retreat to their head offices in difficult times, local banks have nowhere else to be other than in their community. Local banks know their customers, trust their customers and are keen to stick with their customers through both the good and the challenging times. We live close to the business community and make an effective contribution by making good judgements. This is because we have many employees with a high level of expertise in the business sector and because we give business leaders the feedback they need in order to run their businesses.

Helgeland has a well-diversified business sector, with a good balance between a vibrant and export-oriented private sector and a stabilising public sector. Salmon farming and our industrial companies are the driving forces in Helgeland, creating substantial ripple effects throughout the rest of the business sector. When forward-looking investments are made in new businesses, the entire local community's faith in the future will benefit greatly.

As regards confidence in the future and faith in our own finances, 2024 was nevertheless a year where most indicators pointed downwards. It appears that the measures implemented to curb inflation have had an effect and that we will see interest rates come down in 2025. We are excited about the future and about what 2025 will bring.



**Hanne Nordgaard**  
CEO

# The retail market

SpareBank 1 Helgeland is the local bank for people from Helgeland, wherever they live in the country. Over 60% of Helgelanders consider SpareBank 1 Helgeland their main bank, and the bond between the Bank and its customers is very strong.

Competition in the banking market was once again strong during 2024. Competition from national and international banks that have entered into agreements with various Norwegian trade unions and interest organisations concerning favourable interest rates for mortgage financing has increased markedly. So has competition in the area of payments due to Google Pay's and Apple Pay's solutions. Therefore, when Vipps launched its contactless payment solution for mobile phones in December it was a major story.

SpareBank 1 Helgeland's retail market lending grew by 6.5% in 2024. This was well above the market growth in Helgeland and in line with the Bank's ambition to achieve profitable growth equal to market growth or more.

In 2024, there was low activity in the housing market in both Mo i Rana and Mosjøen. It is taking longer to sell homes and prices have been weak down compared with 2023. The price per square metre has fallen by 4.8% for flats, while detached houses saw a decline of 8%. The price level is well below cities such as Bodø, Trondheim and Oslo.

Deposit growth in the retail market during 2024 amounted to 7.7%. Despite these expensive times and relatively low interest rates on bank savings throughout 2024, this is the form of savings that is closest to the heart of Helgelanders in troubling economic times.

The Bank has been very successful in selling non-life and personal insurance for Fremtind Forsikring, and the Bank is also taking an increasing share of the market for car and boat financing through secured loans in partnership with SpareBank 1 Finans Nord-Norge. Use of the Bank's digital customer interfaces

continues to rise. In 2024, the Bank further developed its platform for digital and personal communication based on data analysis. Mobile banking has now become our most used customer channel, and our digital assistant "Robbie" helps customers by giving fast answers to a wide range of questions without the customer having to wait in a telephone queue. Customer survey after customer survey has indicated that mobile banking and technical solutions are very popular among SpareBank 1 Alliance customers.

Face-to-face meetings between the Bank and the customer are just as important today as they ever were, but the digital assistants and self-service solutions complement each other to provide a high-quality and integrated customer experience. As regards simple improvements and investments, our customers expect appropriate and fast action, often without the assistance of an advisor. However, when a customer is making a major investment or investing in something for the first time, the personal touch and expertise that an advisor can bring is our most valuable contribution with respect to the customer. Face-to-face meetings are also very important when our customers find themselves in difficult situations and where financial advice and guidance are crucial. It is also vital that we provide excellent customer service. As more and more people seek more and better digital services, we will also look after those who are perhaps not as enthusiastic about the trend towards digital solutions. SpareBank 1 Helgeland, the Alliance and the rest of the banking industry are working to avoid digital exclusion and comply with the industry standard that ensures the digital inclusion of analogue users.

Fraud is another area that is growing. Fraud can affect us all, and we must raise awareness of all the traces that we leave behind that could be misused. In this regard, the banks have an important social role to play together with the authorities in informing customers and the population at large, and avoiding losses for both the customer and the Bank. With the introduction of a new Financial Contracts Act, the Bank's liability for fraud and abuse has increased further. Unless the customer has been grossly negligent or failed to notify the Bank as soon as possible, the Bank is now fully liable by law.



# Corporate market and business sector in Helgeland

Like the business sector in other parts of Norway, the business sector in Helgeland continued to see higher costs without cuts in interest rates. This reinforced the slowdown in investments from 2023, with the result that the number of new investments in 2024 was limited. It also resulted in the downscaling of Freyr AS's battery initiative and the inadequate awarding of grid connections for electricity, which are essential if more companies are to establish a presence in Helgeland going forward.

However, some major investment decisions were realised towards the end of 2024. These include, for example, a new upper secondary school and football hall in Vefsn, an onshore salmon facility in Nesna, a new salmon slaughterhouse in Lovund and the construction of a new airport in Mo i Rana. These projects have resulted in several good subcontracts for local businesses. In light of this, the outlook for 2025 is positive for many local companies.

The work on sustainability was highlighted as an important priority area by the Bank in 2024, both through in-depth training for the organisation and the Bank's corporate advisers, then in collaboration with business associations in Helgeland through courses and training for corporate customers in Helgeland. The "Om:Nord" ("About:North") training programme, which is a joint venture involving all of the business organisations in Northern Norway designed to raise awareness and improve skills in the business sector in the region, should in particular be mentioned. In Helgeland, seminars were held in Mo i Rana, Mosjøen and Brønnøysund. Together with the SpareBank 1 Alliance, sustainable finance and the green financing framework will play a prominent role in financing the business sector in Helgeland going forward.

The growth in lending in Helgeland was moderate in 2024, with lending growth of 3.8% in the corporate market. This growth rate for lending reflects the slightly lower activity in the business sector in Helgeland in 2024. The proportion of deposits among the local business sector has been edging downwards, although given the macro factors for 2024, the proportion has nevertheless remained relatively high. The total reduction in deposits was related to the closing of a major municipal deposit account.

The Bank has adopted a new credit work surface that was jointly developed by the SpareBank 1

Alliance. This is expected to streamline and improve the quality of the Bank's credit processing. In 2024, the Bank saw continued good growth for its fund and pension products. Among other things, the portfolio of the former pension provider has now been moved to the SpareBank 1 Alliance.

## INDUSTRY, BUILDING AND CONSTRUCTION

The service industry in Helgeland saw good activity and assignments throughout 2024. In Helgeland, the industry has proven itself highly innovative and competitive over many years, and today it has several major contracts with the industry in Helgeland, Nordland and Northern Sweden.

For building and construction, the first half of 2024 was characterised by little building activity and some layoffs. However, this improved in the second half of 2024, when several larger projects started. House and flat building has largely halted, which is also contributing to lower activity in the building and construction industry.

The real estate industry had a challenging year with liquidity problems resulting from the persistent high interest rates. However, the rental market was good, and rents were adjusted on an ongoing basis. However, many customers required interest-only periods for parts of the year.

## SERVICES, WHOLESALE TRADE, TOURISM AND TRANSPORT

Local businesses in the wholesale and retail trade and services industry had a variable year. While retail and capital goods sold well, sales of, and the activity in, construction goods decreased due to tighter business conditions. While activity decreased, the rate of bankruptcies in the sectors did not increase significantly, and services industries remain well diversified for the rest of the business sector.

The hospitality industry in Helgeland continues to grow, helped by a weak Norwegian kroner exchange rate and increasing interest in Helgeland as a destination. It is clear that the interest in investing in the region's tourism industry is good, and has increased with start-up of the construction of a new airport in Mo i Rana. This will also provide good opportunities for growth in several sectors when it is finished.

## AQUACULTURE AND AGRICULTURE

The aquaculture and agricultural industries are a large sector in Helgeland, and the value of seafood exports also continued to grow in 2024.

Many investments were put on hold upon the introduction of the resource rent tax, although in 2024 many of these were initiated. This resulted

in considerable activity for local and regional businesses, and this will strengthen further in 2025 when the investments will be completed. In autumn 2024, construction of a major onshore aquaculture facility started in Nesna. This will have significant local ripple effects going forward.

Good agricultural settlements over the last couple of years have resulted in better financial operating conditions for farmers. The industry is well prepared for the green transition and appears interested in working on developing agriculture for the green transition. The Bank is also focused on this in relation to this industry and is actively collaborating with the industry and cooperatives on the climate challenges facing the industry.

## **PUBLIC SECTOR**

The public sector in Helgeland is a major and stable factor for the business sector both in terms of the purchase of services and benefits, and it has also been a good contributor to recruitment in Helgeland as it provides good opportunities for partner recruitment in conjunction with hiring in the business sector. However, investments made by the public sector are also an important factor in maintaining good activity levels in the business sector. This is clear from major investments in schools, nursing homes, etc. to which local businesses can be suppliers.





# Financial performance in 2024

The price inflation from last year remained an area of focus in 2024. The central banks' interest rate hikes in 2023 brought inflation down towards their targets. Labour markets loosened and inflationary pressures diminished. In the second half of the year, the central banks of our main trading partners cut their policy rates a number of times, while somewhat more entrenched inflation here in Norway meant that Norges Bank saw no basis for cutting its policy rate in 2024.

## THE GLOBAL ECONOMY

The strong economic growth seen after the pandemic declined sharply in late 2023 and over the course of 2024. Activity levels and inflationary pressures levelled off at a lower level than previous years and have contributed to the fact that central banks in the most central economies have carried out several interest rate cuts.

The US Federal Reserve surprised markets with a double interest rate cut in September. The Federal Reserve explained its interest rate decision as being due to concern about higher unemployment and a desire to rebalance by providing additional stimulus for the labour market. At the same time, the governor warned that the double cut

should not be interpreted as a new normal and signalled that interest rates would be cut less going forward than they had previously indicated. Market expectations concerning future interest rates rose markedly in the autumn, long US government bond yields have increased by about 100 interest points since their lowest level in September. Trump's election victory removed the uncertainty associated with the election results, and with control over both chambers of the US Congress, election promises such as tax cuts and deregulation are likely to be implemented. Lower taxes and fewer regulations, as well as higher tariffs, may increase profits for US businesses.

China's economy experienced a sudden slowdown last year, which led to a support package for municipalities and counties of USD 1 400 billion in November. Europe is struggling with weak growth, political instability and increasing budget deficits, especially in Germany and France. Germany has seen close to zero growth for 2 years, with a lack of business confidence due to high energy prices. Mario Draghi's report from September 2024 points out weaknesses in Europe, including low productivity growth and a lack of standardisation and technological scaling compared with the US. Price inflation has come down to the central bank's target in Europe, which has led to interest rate cuts and indications of further cuts. France's national budget deficit is expected to exceed 6% of GDP, with a downgraded credit rating and higher lending rates as the result.



In 2024, stock markets performed well in most countries, and particularly strongly in the US. The wide-ranging US S&P 500 index rose by 23%, making it the second year in a row where returns have exceeded 20%. The S&P Index has risen by more than 20% over the past 6 years. The combination of strong growth in the US, low unemployment, increase in industry returning home, strong growth in productivity and a business-friendly policy has helped the US stock market perform far stronger than Europe. The US share of the world index, MCCI World, has risen to around 70%. In 2024, this world index rose by 21% in local currency, and given that the Norwegian krone weakened throughout 2024, the return including the weakening in the Norwegian krone was 24%.

The global economy is expected to grow by just under 3% in 2025. The estimate for the US is 2.5%, for Europe it is below 1% and for Norway it is around 1%. Excessive optimism is a not immaterial risk factor for financial markets and has driven up prices of equities, bonds, real estate and crypto over a long period of time. Historically, periods of strong growth are often followed by corrections.

### **THE NORWEGIAN ECONOMY**

The Norwegian economy has been robust given the tight monetary policy Norges Bank has pursued in order to bring down inflation. The labour market has remained strong and unemployment low despite some industries and regions experiencing lower activity levels. Inflation has come down, but slightly less than at our main trading partners and not enough for Norges Bank to deem it reasonable to cut its policy rate. A weak Norwegian krone, high wage growth, increased investments in the oil and gas industry and moderately expansive national budgets have helped to maintain a high level of activity in the economy, and have thus also contributed to inflation having fallen less than at our neighbours.

This contributed to Norges Bank keeping interest rates unchanged throughout 2024, despite the fact that their colleagues in most Western countries cut interest rates several times in the autumn. At the same time, the indications from the governor of the central bank are that inflation is coming down to target and that the time for interest rate cuts is approaching. However, just like her US colleague, she has indicated that going forward the number of interest rate cuts could be fewer than previously indicated. Although Norwegian households have yet to benefit from interest rate cuts, falling inflation and strong pay settlements contributed to real wage growth for the first time since 2020. Norges Bank and Statistics Norway estimate that real wage growth for 2024 will be around 2%. House prices performed stronger than the year before with total price growth of 6.4%. This looks like strong growth, although when viewed in a slightly longer perspective and adjusted for the consumer price index, it remains moderate after house prices have fallen in real terms for a number of years.

### **DEVELOPMENTS IN HELGELAND**

The labour market in the region has remained very strong and unemployment has only risen marginally. Just as for the country in general, 2024 was characterised by high inflation, persistently higher interest rates than the year before and a building and construction industry that has experienced a failing market. However, as described in the discussion of the business sector's performance in Helgeland above, both the public and business sectors are contributing investments that are increasing activity levels. Both the export-oriented industry and tourist industry are benefiting from a weak Norwegian krone. During the year, the housing market performed moderately positively with a nominal inflation rate of 3%, which means that price growth was somewhat weaker than in the country as a whole.





# Sustainability report for SpareBank 1 Helgeland

# Conclusion

Foreword	15
ESRS 2 General disclosures	16
Basis for preparation	16
Governance	16
Strategy	21
Impact, risk and opportunity management	25
ESRS E1 Climate change	28
Strategy	28
Impact, risk and opportunity management	31
Metrics and targets	35
ESRS S1 Own workforce	48
Strategy	48
Impact, risk and opportunity management	49
Metrics and targets	52
ESRS S3 Affected communities	56
Strategy	56
Impact, risk and opportunity management	57
Metrics and targets	59
ESRS G1 Business conduct	60
Governance	60
Impact, risk and opportunity management	60
Metrics and targets	62



## Foreword

SpareBank 1 Helgeland made major progress in the work on becoming an even clearer and stronger driving force for sustainable growth and cooperation in Helgeland in 2024. We are particularly pleased to have adopted the Bank's first climate transition plan that demonstrates how the Group will work to cut emissions in operations, investments and the loan portfolio.

The EU Corporate Sustainability Reporting Directive (CSRD) will significantly impact operations, risks and opportunities given that environmental, social and governance (ESG) conditions will have to be included to a far greater degree in the Group's business areas. In order for the Group to achieve its sustainability objectives, significant resources have been expended on strategy work, skills development and reporting.

Going forward, SpareBank 1 Helgeland will systematically work to operationalise the targets, actions and indicators for our material topics and to manage impacts, risks and opportunities in an effective and appropriate manner.

The Bank wants to work closely with our customers and local communities and help bring about a greener and more inclusive world. We can only do this if making climate friendly and inclusive choices based on a solid knowledge base is facilitated. This is something to which this local bank wants to contribute.

A handwritten signature in blue ink that reads "Hanne Nordgaard". The signature is fluid and cursive, with a long, sweeping line for the first letter 'H'.

**Hanne Nordgaard**  
CEO

# ESRS 2 General disclosures

## BASIS FOR PREPARATION

### GENERAL BASIS FOR PREPARING SUSTAINABILITY REPORTS

SpareBank 1 Helgeland will be subject to the reporting obligations of the CSRD for the first time for the financial year 2025, but has chosen to base itself on these regulations in the sustainability report for 2024. This report has therefore been prepared in accordance with the CSRD based on the European Sustainability Reporting Standards (ESRS). The sustainability reporting is under development, and there may be deficiencies in this year's report that must be remedied for the reporting year 2025.

#### Framework for the annual report

There are no differences between the companies included in the consolidated financial statements in the financial annual report and those in the sustainability report. The consolidation policies are set out in Note 1 – Accounting policies. This report covers both the upstream and the downstream supply chains and activities, although it is not exhaustive in all areas. For a further description of the value chain see "Strategy, business model and value chain" under "General disclosures".

### DISCLOSURES RELATED TO SPECIAL CIRCUMSTANCES

There is some uncertainty associated with estimates in a number of areas of the report. SpareBank 1 Helgeland prepares its carbon report in line with Finance Norway's guide for calculating financed emissions.<sup>1</sup> This is based on the Greenhouse Gas Protocol (GHG Protocol) and Partnership for Carbon Accounting Financials (PCAF) factors for calculating emissions. The emissions calculation category 15, financed emissions, is largely based on industry estimates. These will be imprecise with respect to actual emissions in the portfolio and will not capture whether individual customers are increasing or reducing emissions. In order to measure the impact of actions, we need access to more and better data. In the short term, the Bank will work on introducing carbon accounting and more accurate consumption data from large and emission-intensive customers, and eventually for larger parts of the portfolio. For real estate (residential and commercial properties) that the Bank has collateral in, we have little data on energy labels and therefore little accurate data. A lack of energy labels affects the Bank's ability to provide green financing, classify properties under the green bond framework, classify homes that are green under Article 8 of the Taxonomy Regulation, estimate the correct risk in the collateral portfolio

and influence borrowers and property owners to choose green solutions. The Bank wants to help increase the levels of energy labels and therefore has set a target of a 5% annual increase in energy label levels.

#### Error in the Annual Report 2023

The Bank has identified material errors in the calculations of emissions in category 15 of the Group's carbon report and has therefore recalculated these. For a description of these see "Gross scopes 1, 2, 3 and total GHG emissions" under "Climate change".

#### Time horizons

The institution has not deviated from the time horizons defined in section 6.4 of ESRS 1.

Short-term	= < 1 year
Medium-term	= 1-5 years
Long-term	= > 5 years

#### Incorporation by reference

A full description of the processes to identify and assess material impacts, risks and opportunities is provided in ESRS 2 General Disclosures. Therefore, the sections on climate change and business conduct refer to this for related disclosure requirements.

A full description of interests and views of stakeholders is provided in ESRS 2 General Disclosures. Therefore, the sections on own workforce and affected communities refer to this for related disclosure requirements.

## GOVERNANCE

### THE ROLE OF ADMINISTRATIVE, MANAGEMENT OR SUPERVISORY BODIES

The Supervisory Board is the supreme body in SpareBank 1 Helgeland. The Supervisory Board's duties include monitoring the management of the bank and ensuring that the purpose of the bank is promoted in accordance with the legislation, articles of association and Supervisory Board's decisions. It approves the annual financial statements, including allocation of the year's profit or coverage of deficits. It receives information about the operations of the bank and can require further information about operations to the extent it finds necessary. The Supervisory Board may conduct investigations by itself or via committees.

The Supervisory Board approves the remuneration of the Bank's officers and auditor. It elects the chair and deputy chair of the Supervisory Board. It also

<sup>1</sup> <https://www.finansnorge.no/siteassets/dokumenter/maler-og-veiledere/veiledere-for-beregning-av-finansierte-klimag-assutslipp.pdf>



selects the members and deputies of the Board of Directors who are not elected by, and from among, the employees in their own elections. Furthermore, it elects the chair and deputy chair of the Board of Directors. The Supervisory Board selects the chair and members, along with personal deputies, of a nomination committee tasked with preparing elections and establishing instructions for the nomination committee designed to ensure compliance with the suitability requirements.

The Supervisory Board also chooses the auditor or audit firm and who will certify sustainability reports, deals with other matters that pursuant to the law or articles of association must be dealt with by the Supervisory Board, and makes decisions about, or authorises, raising foreign capital that will count towards the Bank's primary capital.

The Supervisory Board comprises 25 members, of which one is the chair and the other members without managerial responsibilities. The body consists of 32% women and 68% men, with different backgrounds and competences. Nine of the members are selected by, and from among, the customers of the Bank. 10 of the members are selected by, and from among, equity certificate holders. Six of the members are selected by, and from among, employees. All of them are independent of the Bank's Management Group. A comprehensive description of the Supervisory Board's duties and members can be found on the Bank's website.

**The Board** has overall administrative responsibility for the Bank, including the Bank's work relating to sustainability and corporate social responsibility. The Board's combined competence must be assessed on an ongoing basis, ref. the policy for suitability assessments of board members, where expertise in sustainability forms part of the assessment. In 2024, the Board underwent training on the CSRD and the responsibilities of the Board of Directors. The work on the climate transition plan has been considered several times. The Board is responsible for, and has approved, all commitments adopted in the sustainability strategy, as well as the various guidelines linked to corporate social responsibility and sustainability, privacy, anti-money laundering, corporate governance, information management, code of conduct and HR strategy. The CEO is responsible for supervising this, while day-to-day monitoring and follow-up is delegated to middle managers or specialist coordinators. A more detailed description of the Board's areas of responsibility, election, members and independence is provided under corporate governance. The Board of Directors has eight members: a chair, a deputy chair and six board members without managerial responsibilities. There is a 50/50 balance of women and men on the Board. All board members are non-executive directors. There are two employee-elected board members.

**The Risk Committee** prepares the Board of Directors' assessments of risk and capital needs, is in regular contact with the risk control function, assesses pricing and risk appetite, and monitors risk policies. At least once a year, it reviews risk policies, strategies and various relevant documents, including the sustainability strategy and corporate social responsibility and sustainability policy and recommends necessary adjustments based on changes and market developments to the Board of Directors

**The Audit Committee** is tasked with briefing the Board of Directors on the outcome of audits and certifications of sustainability reports, explaining the role of the Audit Committee, preparing the Board's follow-up of reporting processes, monitoring internal controls, risk management and internal audits, and ongoing liaison with the auditors concerning audits of financial statements and sustainability reports in line with the Audit Regulation. The Audit Committee has three members elected by, and from among, the board members.

**The organisation** of the Bank's sustainability work is shared between a sustainability coordinator, the various business areas' responsibilities and the Management Group. The six-member Management Group consists of three women and three men. On a day-to-day basis, the work is led by the sustainability coordinator. The sustainability coordinator is attached to the business development business area and other resources are allocated to the Bank's work on sustainability as needed. The Group's CFO is responsible for reporting in line with the Corporate Sustainability Reporting Directive (CSRD), and the division also contributes to other strategic work. Other departments contribute, to varying degrees, to relevant parts of the work on sustainability. The specialist coordinator reports to the Management Group, which in turn reports to the Board of Directors. The specialist coordinator reports to the Management Group on a quarterly basis, or more often if necessary, on progress and goal attainment. The Board has overall responsibility for the Bank's work in this area. IRO assessments are conducted and reported on via annual reviews of the sustainability strategy and annual reviews of the materiality assessment.

## Board members:

### Chair: Bjørn Krane

- Vice chair of the Board of Directors since 2020
- Graduated with a master's of laws from the University of Tromsø. Lawyer/partner at Advokathuset Helgeland DA. Has long assisted SMEs within business law. Particularly works with transactions, reorganisations, mergers and demergers, as well as main areas such as fisheries and aquaculture and real estate. Several board positions in Helgeland.

#### **Deputy chair: Siw Moxness**

- Board member since 2019.
- Graduated as a chartered engineer in chemical process technology from the Norwegian University of Science and Technology (NTNU) and worked for a long time in the aquaculture industry in Aquarius, Kystinkubatoren and Vigner Olaisen. Currently works in real estate operations and development in Hamnholmen AS.
- Board experience from state-owned enterprises, health trusts, municipalities and limited companies in various industries. He is currently a board member of the foundations Sparebankstiftelsen Helgeland and Bjørg Stemland og Bjørnar Olaisens Stiftelse.

#### **Board member: Marianne Terese Steinmo**

- Board member from April 2016 and deputy member from April 2015 - April 2016.
- Master's in business and economics from Bodø Graduate School of Business. She is a professor of innovation and head of the Centre for Industrial Business Development at Nord University. She is a board member of Utror AS.

#### **Board member Ann-Helen Baadstrand:**

- Board member since April 2022
- Master's in business administration and technology management from Nord University. CEO of Mosjøen Kulde og Klimaservice AS (MKK), and CEO of its subsidiary Bon Air Sweden AB. Ann-Helen has extensive experience within marketing and reputation and brand building from several different companies. She also works actively with a working group to establish a women's network in Vefsn, Grane and Hattfjelldal.

#### **Board member Geir Andreassen:**

- Board member since 2024
- Graduated from Nordland District University College (now Nord University). Has completed various management programmes within project management, change management and strategy and marketing. He is a senior consultant at SpareBank 1 Utvikling and previous group bank manager and EVP at SpareBank 1 Nord-Norge.

#### **Board member Yngve Myhre:**

- Board member since 2024
- Graduated from Bodø Graduate School of Business and NHH Norwegian School of Economics.
- Yngve is the owner and an investor in Rosøy

og Nima Invest AS, he also works in an advisory capacity for customers in the seafood industry. He sits on a number of boards, including Nova Sea, Gaia Salmon and Kime Akva AS.

#### **Board member and employee-elected representative Solrun Johansen:**

- Board member since April 2022
- Has completed various economic qualifications and individual courses. She has worked at the bank since 2013 and has been an employee-elected representative since 2018. She currently works in the direct bank and is responsible for fraud management.

#### **Board member and employee-elected representative Kenneth Normann:**

- Board member since April 2022
- Graduated from Trondheim Business University College in economics and administration. Kenneth joined SpareBank 1 Nord-Norge in 2010 and SpareBank 1 Helgeland in 2021. He is the Bank's chief employee-elected representative and is an authorised financial adviser.

#### **The Bank's Management Group**

##### **CEO Hanne Nordgaard:**

- Appointed in 2017
- Master's in business and economics from NHH Norwegian School of Economics 1995, main programme at NNL 2007, coaching at Telemark University College 2009, trainee and project manager Storebrand Liv (1995-1998), CFO Helgeland Bilruiter/gods (1998-2001), CFO SHMIL (2001-2004), director SHMIL (2004-2007), EVP and regional director SpareBank 1 Nord-Norge (2008-2017).
- Board experience from several companies and industries.

##### **Retail Market Director Dag-Hugo Heimstad:**

- Appointed in 2006.
- Graduate economist from BI Norwegian Business School (1991), future studies at UiT The Arctic University of Norway (2009).
- Previous experience as bank manager at SpareBank 1 Nord-Norge Mosjøen, CEO at Norgesvinduet Svenningdal AS, CFO and HR consultant in Hattfjelldal Municipality and HR employee in Vestvågøy Municipality.

##### **Corporate Market Director Bjørn Tore Brønlund:**

- Appointed in 1993.

- Graduate economist from BI Norwegian Business School (1991) and master's in management, strategy and leadership from the Norwegian University of Science and Technology (NTNU) (2014).
- Corporate adviser at Sparebanken Rana, and Helgeland Sparebank since the merger in 2005. Attached to the corporate department in Mo i Rana in various positions, including specialist coordinator for fisheries and aquaculture. CFO at Nord Miljø AS, Mo i Rana from July 2007 to September 2009. Appointed corporate market director in Helgeland Sparebank, Mo i Rana in 2009.

#### CFO Anne Ekroll:

- Appointed in 1994.
- Registered public accountant Trondheim Business University College, 1989. Credit and deposit law in 1996 as well as investment advice at BI Norwegian School of Business in 1999. Authorised accountant, 2007. Main programme NNL, 2011. MBA in technology management at Nord University, 2019.
- Served as head of risk management since 2007 but was appointed CFO in 2022. Previously worked as head of risk management. Previous experience as contracted CFO of Cani AS, credit and deposits manager Sparebanken Rana, senior corporate adviser and internal auditor Sparebanken Rana, audit associate PricewaterhouseCoopers AS.

#### Business Management Director Øyvind Karlsen:

- Appointed on 01.03.13
- Graduated from Nordland District University College in organisation and administration. Foundation course in law from the University of Bergen, economics and insurance subjects from BI Norwegian Business School. Authorisation within life and non-life from BI and authorised financial adviser from AFR.
- Previous experience as bank manager and adviser in SpareBank 1 Nord-Norge, senior adviser in Rana Utviklingsselskap, consultant in Mo and Omegn BBL and various positions in Rana Municipality.

#### Risk Management Director Cecilie Johnsen:

- Appointed on 01.02.23
- She is a trained police officer and holds a master's in experiential investigation.
- Cecilie has worked as the head of financial crime prevention investigation at TietoEvry, with a focus on stopping and preventing financial crime. She helped to start up and implement intelligence gathering in Nordland

Police District and was responsible for heading and coordinating the intelligence process in the operations unit in Rana. She also has experience of investigating organised crime, including money laundering.

### INFORMATION PROVIDED TO AND SUSTAINABILITY MATTERS ADDRESSED BY THE UNDERTAKING'S ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

#### The Board of Directors

The Board is very familiar with climate risks and opportunities thanks to the Board's ongoing work, which includes strategic discussions, updating and approving governance documents, and reviewing various reports from the Management Group. The Board receives regular reports. The Board is informed about climate-related issues through these. The key reports are:

**Quarterly risk reports:** Developments in the Group's ESG risk exposure are reported as a specific topic in risk reports.

**Quarterly compliance reports:** ESG compliance risks are reported as a specific topic in compliance reports.

**Annual ICAAP:** The annual internal capital adequacy assessment process (ICAAP) of the Group's overall capital needs and risk exposure includes ESG risk. The physical climate risk and transition risk for residential and commercial properties are included here, and the Group's climate risk exposure is assessed based on climate scenarios.

**Quarterly risk assessments from Management Group:** ESG risk assessments are included in these.

The sustainability strategy (annual revision) and associated ambitions in the area were approved by the Board of Directors after the balance sheet date for the annual report for 2024, although prior to presentation.

#### Corporate Sustainability Reporting Directive (CSRD)

The Bank conducted a materiality assessment process and associated gap analysis in accordance with the CSRD in the second half of 2023, and the annual report for 2024 is, for the first time, in part based on the CSRD. Throughout the year, efforts were made to close gaps, including preparing the Bank's first version of the climate transition plan in line with the goals of the Paris Agreement.

#### Climate transition plan – net zero 2050.

In the fourth quarter, a transition plan was presented to, and approved by, the Board of Directors. This included targets for emission pathways and targets for the periods up to 2030, 2040 and 2050.

The EU Taxonomy and identification of assets on the balance sheet that are not in line with what is classified as green assets according to this are reported annually in the annual report.

31.12.24

	Management Group	The Board of Directors	Audit Committee	Risk Committee
The number of meetings in which one of the material impacts, risks and opportunities was a topic	10			
Ongoing updating of the follow-up of strategies, targets, actions and progress on the sustainability strategy	4			
Number of meetings in which sustainability matters were one of the topics		18	7	10
Number of governance documents approved by the Board of Directors (strategies and policies in ESG related areas)		1		
Number of reports on the progress on targets and actions in all or part of the sustainability strategy		4		
<b>Total</b>	<b>14</b>	<b>23</b>	<b>7</b>	<b>10</b>

## INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES

The Bank does not have any variable pay or bonus schemes which are directly linked to the Bank's results.

### STATEMENT ON DUE DILIGENCE

Key elements of due diligence	Key elements of due diligence
a) Embedding due diligence in governance, strategy and business model	<ul style="list-style-type: none"> <li>Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies, page 19.</li> <li>Material impacts, risks and opportunities and their interaction with strategy and business model, pages 24-25.</li> </ul>
b) Engaging with affected stakeholders in all key steps of the due diligence	<ul style="list-style-type: none"> <li>Interests and views of stakeholders, pages 22-24.</li> <li>Description of the processes to identify and assess material impacts, risks and opportunities, pages 25-26.</li> <li>Topical ESRS: reflecting the different stages and purposes of stakeholder engagement throughout the due diligence process, pages 48 and 56.</li> </ul>
c) Identifying and assessing adverse impacts	<ul style="list-style-type: none"> <li>Description of the processes to identify and assess material impacts, risks and opportunities (including application criteria related to specific <i>sustainability matters</i> in the relevant ESRS), pages 31 and pages 60-61.</li> <li>Material impacts, risks and opportunities and their interaction with strategy and business model, pages 24-25, 28-31, 48-49, 56-57.</li> </ul>
d) Taking actions to address those adverse impacts	<ul style="list-style-type: none"> <li>Topical ESRS: reflect the range of <i>actions</i>, including <i>transition plans</i>, through which actions the impacts are managed. Pages 28, 31-35, 51-52, 59-60 and 62.</li> </ul>
e) Tracking the effectiveness of these efforts and communicating	<ul style="list-style-type: none"> <li>Topical ESRS: in terms of <i>metrics</i> and <i>targets</i>. Pages 39-48, 53-56, 59-60 and 62.</li> </ul>

## RISK MANAGEMENT AND INTERNAL CONTROL FOR SUSTAINABILITY REPORTING

SpareBank 1 Helgeland will be subject to the reporting obligations of the CSRD for the first time for the financial year 2025 and will in the first half of 2025 implement appropriate internal control to reduce the risk of reporting errors.

The Bank uses an external internal auditor. In 2024, the Bank's internal auditor audited the Bank's stress test for climate risk and it was assessed as being "best practice".



# STRATEGY

## STRATEGY, BUSINESS MODEL AND VALUE CHAIN

### Business model and value chain

	UPSTREAM	OWN ACTIVITIES				DOWNSTREAM
Commercial activity:	Funding	Support and staff functions	Credit process	Products	Social contributions	Use of capital by customer
Activities	Capital market and deposits from customers. Involves regular contact with investor and broker environments, market monitoring, analysis and assessments related to funding structure.	Reporting (internal and external), administrative, IT, Compliance, Risk, AML, Legal, purchase of goods and services, property management, internal and external communications, skills development, authorisations, recruitment and maintenance of employment relationship, pay, policy renewal, framework, signing agreements.	Follow-up of risk, defaults in portfolio, deposits (disbursements) follow-up of regulations.	Customer advice and product development. Mortgages, corporate loans, insurance (non-life, life) secured loans (cars, caravans, boats) consumer loans, (credit card), savings products, deposits.	Sponsorship and gifts from the Bank and the foundation with associated administrative and communication follow-up.	
Geographical scope	Norway	Norway Helgeland	Norway, Helgeland	Norway Helgeland	Helgeland	
Important business associates	Banks, brokerages, analysts, customers. Oslo Børs, Nordic Trustee, Bloomberg, Tieto Evry (portwin).	Nets, TE, SpareBank 1 Utvikling, SpareBank 1 Nord-Norge (SNN), Visma, HR manager/Talent recruiter, Simployer (manuals), Winningtemp, Avonova, Frisk 3 and Sør-Helgeland Bedriftshelsetjeneste, Finance Norway and the Finance Sector Union of Norway, FinAut, Spama, KanFinans, university colleges/universities, FT, EBA, stock exchanges.	SpareBank 1 Utvikling (loss model provider).	Fund providers, Fremtind, SNN Finans, SpareBank 1 Kreditt, SpareBank 1 Utvikling.	Clubs and associations in Helgeland.	
Key resources	Finance Department	Compliance, IT, HR, Finance, Risk, Market	Credit, Risk	IVER, CM/RM	Employees of the gift foundation, bank managers, marketing department	
Contributes to total income	Some contribution	Minor contribution	Some contribution	Major contribution		Major contribution

### Governance documents for sustainability

The work relating to sustainability and corporate social responsibility is rooted in the UN Principles for Sustainable Banking and the UN Sustainable Development Goals, both of which are based on the precautionary principle.

At the Bank, this work is embedded in the Group's strategic platform for 2023-2025.

The governance documents for sustainability are revised annually. These own operations and value chain.

The sustainability strategy was adopted for 2 years in 2022 and revised towards the end of 2023. It is based on a double materiality assessment and aims to identify and manage impacts, risks and opportunities within the area of sustainability. The sustainability strategy, policy for corporate social responsibility and sustainability and code of conduct are available on the Bank's website. These have been adopted by the Board of Directors and apply to the entire organisation and all operations,

and are available to the public.

The Bank's work relating to corporate social responsibility and sustainability is broad and affects all areas of the Bank's operations. The approach to the topic and the scope of the work processes vary between the business areas and different operations. Corporate social responsibility and sustainability therefore have a natural place in many company-specific governance documents, and the Bank continually strives to ensure that these documents are kept up-to-date.

### Collaborations and initiatives

SpareBank 1 Helgeland wants to be an active driving force behind the development of a sustainable society and is a member of numerous partnerships which contribute to this in various ways. Key stakeholders we work within include:

- Eco-Lighthouse
- Finance Norway
- SpareBank 1 Alliance

## Strategy and direction

It is crucial for SpareBank 1 Helgeland to have a clear strategic direction and management process for its sustainability work. A clear strategic direction gives the Bank an opportunity to utilise resources efficiently with respect to the Bank's material topics. By identifying and prioritising material topics, the Bank can optimise the use of its resources and ensure that its efforts have the greatest possible impact. This is especially important given that sustainability is increasingly, and rightfully so, an integral part of the business model, where customers, investors and society expect the Group to operate responsibly.

## The Bank's vision and ambitions regarding sustainability

The Bank wants to help build Helgeland into a region that strives to achieve new goals, while of course we acknowledge its heritage and all the good things on which we are building. Only in this way can we be the obvious first choice for our customers in Helgeland.

The combination of a locally managed bank that is close to and understands the people, business and local communities gives us a unique opportunity to be a good ally for our customers in the green transition and all the restructuring that this transition entails. The Bank believes that cooperation yields the best results. Therefore, the ambition for our sustainability work is that we contribute ourselves and help both our customers and society as a whole to get through the transition with their value creation intact, a sound economy and security for the future. The Bank's employees are our most important resource if we are to be successful, and good operations are essential for maintaining market confidence. New laws and regulations, changing customer behaviour and

clear expectations in the market mean that the work on sustainability must be developed further and integrated with the Bank's other business areas.

The Bank is in contact with the majority of Helgelanders, all of our sectors and all of our large and small cities and more rural districts. The profit generated by the Bank and distributed via the Bank's and the foundation's donation and sponsorship activities helps to make Helgeland a more attractive place to live and work. We are committed to managing that privilege responsibly and contributing to sustainable volunteering, where the inclusion of all is key.

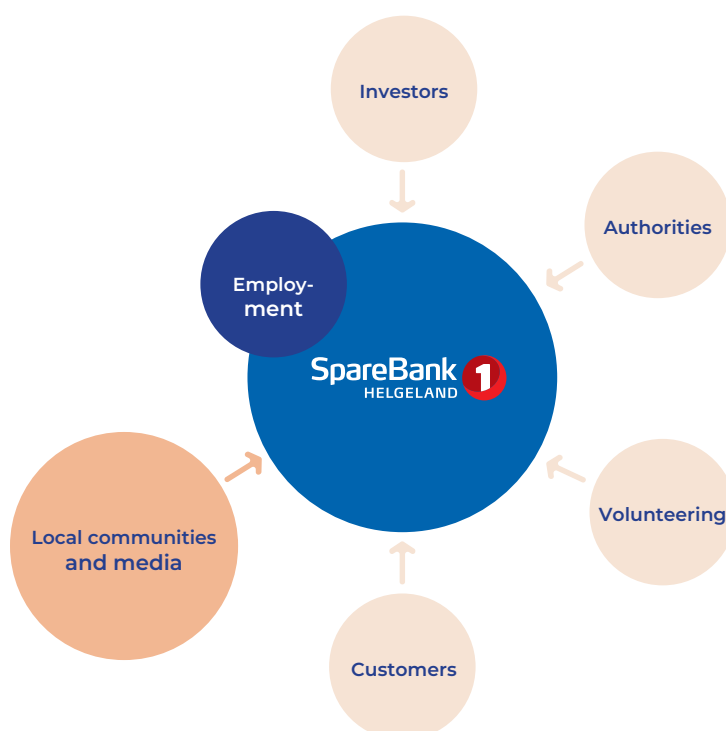
## Customer segments and material climate-related investments

The Group's customer segments are the corporate market (exposure of NOK 10 888 million) and the retail market (exposure of NOK 20 730 million) as at 31.12.24.

As at 31.12.24, the Bank had NOK 240 million in loans exposed to material climate-related investments, of which NOK 231 million were related to renewable energy production, while NOK 9 million were related to fossil energy.

## INTERESTS AND VIEWS OF STAKEHOLDERS

Establishing an open and constructive dialogue with customers, employees, investors and local communities enables the Bank to adapt to changed needs and expectations. This communication provides valuable insights into local economic conditions and customer needs, which are essential in the financial sector. Listening to stakeholders' perspectives and feedback enables SpareBank 1 Helgeland to effectively adapt strategies and services, which helps to build and maintain trust. This engagement also lays the



groundwork for sustainable business conduct, strengthens reputation and ensures the Bank's relevance in an ever-changing market.

Sustainability-related stakeholder engagement is a continuous process. It is a topic in meetings with customers, local communities and employees throughout the year. At a time of economic transition, it is important for the Bank to ensure that it has a good dialogue with key stakeholders. The main stakeholder engagement groups are summarised in the table below:

Local communities and media	Investors	Authorities	Volunteering	Customers	Employment
SpareBank 1 Helgeland contributes to events and business conferences in all of the cities in which we have branches. This facilitates regular contact and engagement. Sustainability is always on the agenda at the Bank's own "Driving force conference".	The quarterly presentations and annual report, which are approved by the Board, contain sustainability information and represent an important part of the ESG engagement aimed at current and potential owners.	The Financial Supervisory Authority of Norway publishes its expectations regarding the area of sustainability at irregular intervals. The same is true for the European Banking Authority (EBA).	The Bank has cooperation agreements that provide the basis for the driving force support the partners receive (consists of community funds and sponsorship funds). The Bank has good engagement with the partners during the agreement periods, which are normally 3-year agreements (phone, digital, in-person meetings and sponsor seminars).	Corporate customers with commitments of more than NOK 5 million have an annual conversation with their adviser. Assessments are also conducted of the customer's ESG risk in the Bank's ESG module. Some 334 assessments were conducted in 2024.	The Bank's ordinary participation processes, such as the Working Environment Committee, Group Committee, Appointments Committee and employee-elected representatives on the Board of Directors and the Supervisory Board, ensure that employees are well informed, involved and have a genuine opportunity to influence decisions.  For further information, see the entitled "Participation".

## Stakeholder engagement and experts

Stakeholder engagement was conducted in autumn 2022 in connection with work on the sustainability strategy. There was substantial stakeholder engagement in 2023 as well in connection with updating the materiality assessment in line with the CSRD. In 2024, the Bank continued its engagement with the business sector and the voluntary sector.

**Employees:** The Bank shall become more sustainable itself and help to enable customers to make good and long-term choices. A good dialogue with the Bank's employees, who are in contact with our customers every day, is crucial if SpareBank 1 Helgeland is to succeed in its work and have a knowledge base on which both strategic choices and measures can be based. Employee skills, including training they have received and will receive in the future, is also an area where we have a major impact.

**Customers:** Three customer interviews were conducted in 2022 as part of the work on the sustainability strategy. As part of updating the materiality assessment and revising the sustainability strategy, we wanted to expand this knowledge base and therefore interviewed one of the business associations in Helgeland in

autumn 2023. We also held meetings with various companies and business associations in the region throughout the year in order to discuss various collaborations within the area of sustainability. Commitments greater than NOK 5 million must be assessed using the Bank's ESG model to assess the customer's ESG risk.

Northern Norwegian business associations have joined forces in the "About:North" programme. This is a forum for green transition in the north. The Bank is a financial contributor to the project and has contributed professionally at a number of seminars. The project aims to bolster a culture of sharing through skills development, making relevant information available, tips and useful tools.

The green transition will result in many opportunities and different action requirements for the more than 18 000 SMEs in the region. Some are well underway, although many are not well enough prepared for the inevitable changes that will come. The focus is on helping the northern Norwegian business sector continue to deliver its goods and services in the green transition. The programme consists of a number of topical breakfast meetings and a skills programme aimed at helping SMEs start work on this.

2024 marked the start of the skills programme in Helgeland. In September and October, workshops on materiality assessments were held in Mosjøen and Mo i Rana with a total of 37 participants from 24 companies. The Bank contributed and put its premises at its disposal.

A digital workshop on sustainability reporting was also conducted in which 10 people took part from nine companies in the region. The skills programme consists of four physical workshops that build on each other and guide a company through a step-by-step process. 83% of the participants have conducted a simplified double materiality assessment.

Helgeland 2024/2025	Number enrolled	Workshop Part 1	Number of companies
Mosjøen	11	14	9
Mo i Rana	26	20	15
Digital workshop on reporting	13	10	9
Brønnøysund	27	22	15
<b>Total Helgeland</b>	<b>14</b>	<b>23</b>	<b>48</b>

**Owners:** The owners are of course an important stakeholder, and in the final phase of the work on the new materiality assessment we therefore met with the CEO of Sparebankstiftelsen Helgeland, the Bank's largest owner, to get its input on the assessments that had been conducted.

**Sports and volunteering:** The Bank is a significant contributor to sports teams, cultural life, clubs and associations. We have a major impact on our local communities through our community contributions via the gift fund and gift foundation, and this is one of our material topics. The Bank therefore talked to a representative of the board of a local sports club while it was in the process of updating its materiality assessment in 2023 to ensure it was in line with the requirements of the CSRD.

SpareBank 1 Helgeland also has a presence in many arenas where we meet our customers and where sustainability is part of the agenda. Representatives of the Bank regularly participate in events organised by business associations and other initiatives, and the Bank believes it is important to have an opportunity to pursue a dialogue with customers, including outside customer meetings. In the 2023/2024 school year, the Bank's young people's economist visited around 6,000 students across Helgeland.

**Experts:** Better regulation is the reason given for many of the changes introduced in the financial industry, including in the area of ESG. A review of the ESG-related statements and expectations of the EBA and the Financial Supervisory

Authority has therefore been conducted to ensure compliance and to keep track of what the authorities expect in the future.

In the IRO scoring phase, some of the feedback from stakeholders influenced the scoring:

- Financed emissions (financial risk) scored higher due to a stronger investor perspective.
- Financing projects that could violate the rights of indigenous people was adjusted downwards following a discussion in the Management Group. This was done because it is essentially the job of the planning authorities to resolve any land-use conflicts that arise.
- The stakeholders are asked if any impacts, risks or opportunities are missing. It was suggested that we strengthen competence in order to have a positive impact. None of the stakeholders mentioned any other impacts, risks or opportunities they wanted assessed.
- In the updating of the double materiality assessment, we scored business conduct impacts and risks slightly higher than last year, and also scored impacts, risks and opportunities higher for a broader sample of our own workforce. The guide from the European Financial Reporting Advisory Group (EFRAG) on double materiality assessments and sharing experiences via the SpareBank 1 Alliance provided useful input that is helping improve the quality of our assessments.

## MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

- Financed greenhouse gas (GHG) emissions are an actual negative impact, and climate change is a financial risk in terms of physical climate risk and transition risk in the customer portfolio. Climate change has also been identified as a financial opportunity for financing the green transition in the market. Energy consumption in our own activities and activities in the value chain is a caused negative impact. The Bank's work on reducing GHG emissions and managing climate risk could impact our strategies on, for example, industry composition in the corporate market, which objects should be financed and which products the Group should offer. All of this has been incorporated into the Bank's strategy and climate transition plan. This impacts the marketing strategies of both CM and RM and the Bank's risk and capital strategy and sustainability strategy. The product portfolio is constantly being refined in order to offer products to customers that incentivise change.
- Working conditions and equal treatment and opportunities for all constitute an actual negative or positive impact, and can at the same time impact the Bank's performance if



a negative impact results in sickness absence and high employee turnover. The Bank's work on its own workforce has been incorporated into the Bank's strategy. The HR policy, code of conduct, HSE plan, corporate agreement and procedures for an equal and diverse working life operationalise the various parts of this work.

- Gifts directly from the Bank's gift fund and the gift foundation, or indirectly via Sparebankstiftelsen Helgeland, mean the Bank has an actual, direct positive impact on our local communities, although they also represent a potential negative impact if the funds distributed cause harm to social and environmental conditions. The disbursements of SpareBank 1 Helgeland's gift foundation and gift fund have been incorporated into the Bank's values and strategies, via the standard for the Helgeland Pledge. The policy for marketing, communication and society operationalises much of this work. The strategy is impacted in the form of which criteria should the distribution of funds be based.
- Misuse of the Bank's services for various forms of financial crime constitutes a potential financial risk and negative impact. An unethical business culture with, for example, poor whistle-blower protections would constitute a potential caused negative impact. The Bank's work on business conduct has been incorporated into the Bank's strategy and a number of governance documents such as the AML policy, corporate responsibility and sustainability policy, sustainability strategy, corporate governance policy, risk management and internal control policy, operational risk policy, etc.

### Financial impacts of the risks, opportunities and impacts

SpareBank 1 Helgeland has not currently quantified the expected financial effects in connection with the risks, opportunities and impacts identified in the double materiality assessment. In connection with its climate risk assessment, the Bank conducted an overall qualitative scenario analysis in order to understand the impacts the identified transitional and physical risks can have on the Bank's operations and emissions pathways. The risks are assessed in relation to a low and high emissions scenario in line with the Net Zero 2050 and Current Policies scenarios of the Network for Greening the Financial Systems (NGFS). The Bank has developed its own stress test for physical climate risk that has been assessed by the internal auditor as being in line with "good market practice". For transition risk, industries and homes exposed to transition risk have been identified.

## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

### DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

In SpareBank 1 Helgeland, the management and control of all risk types, including ESG risk, is organised according to the three-line model with three lines of defence.

The various business areas constitute the first line of defence. Managers in the first line of defence are responsible for identifying, managing and reporting ESG risks related to their business area.

The Risk Management and Compliance Department forms the second line of defence. The risk management director and chief compliance officer are responsible for the work on ESG risk in the second line of defence. The Risk Management Department must help identify, monitor, measure, report, manage, control and assess the Bank's risk exposure. Compliance's main responsibility is to follow up the planning and implementation of internal controls in the organisation and ensure that the controls specifically focus on compliance with key legislation and regulations in order to reduce operational risk.

The Group's internal auditor constitutes the third line of defence. This is an independent monitoring function that conducts risk assessments, controls and investigations of the Bank's internal control and management processes to assess whether internal control systems are satisfactory and ensure portfolio and reporting systems are functioning as assumed. The Board of Directors is responsible for adopting instruments for the internal auditor and approving the Internal Audit unit's plans.

The processes to identify and assess material impacts, risks and opportunities are based on the principle of double materiality. The principle entails identifying sustainability topics that are material in terms of the impact that the institution's own operations can have on environmental and social conditions, as well as sustainability topics that are financially material based on whether these are financial risks or opportunities for the Bank and could therefore impact the institution's value, profitability and reputation.

The methodology used to identify actual and potential impacts, risks and opportunities is based on thoroughly mapping the Bank's value chain and activities. The Bank has identified key activities, locations in the value chain (upstream, downstream, across and own activities), key sub-activities, key players, key resources and contributions to the Bank's income. This was done in collaboration with employees in each individual field and at the Management Group level. Thereafter, mapping is used to identify SpareBank 1 Helgeland's impacts, risks and opportunities. Next, each individual impact, risk or opportunity is

assessed. A scoring model is used for this work with the aid of assessment criteria.

Assessment criteria are approved by the Management Group and used by the Bank to ensure that it focuses its resources on the most material impacts, risks and opportunities. These contain quantitative values. The values can be adjusted or qualitatively assessed if this can be documented and justified.

### Assessment of impact.

The impact scoring model assesses size, scale or scope and, for negative impacts, the degree of irremediability. The average score for this is the consequence of the impact and in the final step this is assessed along with the likelihood of the impact occurring.

### Assessments of risks and opportunities

The Bank's risks and opportunities are assessed based on their estimated financial impacts and likelihood.

### Assumptions in the process

Some assumptions were made after the impacts, risks and opportunities were identified, assessed and scored. A brief overview of these are provided here:

Topic	Assumption	Where in the process
Contributions to breaches of decent working conditions and fundamental human rights The Transparency Act	We have assumed that customers do not fall under "business partners" or "suppliers" in the Transparency Act. This affects scope and assessment.	Assessment and scoring of impacts.
Breaches of privacy provisions	Various scenarios have been created for breaches of data subjects' rights. The ones that scored highest on impacts, risks and opportunities were used for scoring.	Assessment and scoring of impacts, risks and opportunities.
Origin of the funds raised as foreign capital.	Not possible to measure whether the foreign capital stems from activities with a negative (or positive) impact on people or the environment.	Assessments of impacts.

In order to conduct a thorough materiality assessment, it was essential to engage the Bank's main stakeholders, which include the regulatory authorities, owners, customers and the Bank's employees. The interests and needs of the various groups were evaluated in order to form an overall picture of stakeholders' perceptions and opinions of the Bank. This will help the Bank arrive at good and important priorities. The stakeholders we engaged with in 2023 were all asked whether any impacts, risks and opportunities were missing from the Bank's mapping, and the only adjustment suggested was reinforcing competence as a positive impact. The stakeholders mentioned no other impacts, risks or opportunities that they wanted considered. The stakeholders' input was documented in writing and presented to the Management Group prior to changes being made. A summary is presented to the Board of Directors.

### DISCLOSURE REQUIREMENTS IN ESRS STANDARDS COVERED BY THE INSTITUTION'S SUSTAINABILITY REPORT

The topics identified as material for the Bank and approved by the Management Group and Board of Directors in 2023 were:

- Financed emissions/reduction of GHG emissions
- ESG training and skills development
- Contributions to clubs, associations and partners – stipulating requirements for inclusion in events.

The results from the updating of the double materiality assessment were implemented in the period between the balance sheet date and the date the annual report for 2024 was prepared. They were approved by the Board of Directors in February 2025.

The topic "*own workforce*" was expanded and another topic was added "*business conduct*". Both are material topics where the impacts, risks and opportunities scored higher in the update of the materiality assessment. We report on the material topics adopted by the Board in February 2025 for the reporting year 2024.

	Material topics for Reporting 2023	Revised material topics for reporting 2024
E	Financed emissions/reduction of GHG emissions	Climate change (ESRS E1)
S	ESG training and skills development	Own workforce (ESRS S1)
	Contributions to clubs, associations and partners – stipulating requirements for inclusion in events.	Affected Communities (ESRS S3)
G		Business conduct (ESRS G1)

## the disclosure requirements included in this report

SpareBank 1 Helgeland has, to the extent possible, reported in line with the disclosure requirements in the list below in 2024. The Bank is systematically working towards closing all gaps so it can report fully in line with the disclosure requirements for 2025. We managed to close some gaps in 2024, although some work remains to be done in our efforts to rig the organisation such that it can report in line with all of the requirements. Therefore, gaps must be expected in some of the ESRS disclosure requirements in this report.

	Disclosure requirements	Page number
ESRS E1 Climate change	Disclosure requirement related to ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	28
	Disclosure requirement related to ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	28-31
	Disclosure requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities	31
	E1-2 – Policies related to climate change mitigation and adaptation	31
	E1-3 – Actions and resources in relation to climate change policies	31-35
	E1-4 – Targets related to climate change mitigation and adaptation	35-39
	E1-5 – Energy consumption and mix	39
	E1-6 – Gross scopes 1, 2, 3 and total GHG emissions	39-48
	E1-9 – Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	48
(ESRS S1) Own workforce	Disclosure requirement related to ESRS 2 SBM-2 – Interests and views of stakeholders	48
	Disclosure requirement related to ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	48-49
	S1-1 – Policies related to own workforce	49-50
	S1-2 – Processes for engaging with own workers and workers' representatives about impacts	50-51
	S1-3 – Processes to remediate negative impacts and channels for own workers to raise concerns	51
	S1-4 – Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	51-52
	S1-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	52-53
	S1-6 – Characteristics of the undertaking's employees	53-54
	S1-7 – Characteristics of non-employee workers in the undertaking's own workforce	54
	S1-8 – Collective bargaining coverage and social dialogue	54
	S1-9 – Diversity metrics	54
	S1-10 – Adequate wages	54
	S1-11 – Social protection	54-55
	S1-13 – Training and skills development metrics	55
	S1-14 – Health and safety metrics	56
	S1-15 – Work-life balance metrics	56
	S1-16 – Remuneration metrics (pay gap and total remuneration)	56
	S1-17 – Incidents, complaints and severe human rights impacts	56
ESRS S3 Affected communities	Disclosure requirement related to ESRS 2 SBM-2 – Interests and views of stakeholders	56
	Disclosure requirement related to ESRS 2 SBM-3 – Material impacts, risks and opportunities and their interaction with strategy and business model	56-57
	S3-1 – Policies related to affected communities	57-58
	S3-2 – Processes for engaging with affected communities about impacts	58
	S3-3 – Processes to remediate negative impacts and channels for affected communities to raise concerns	59
	S3-4 – Taking action on material impacts on affected communities, and approaches to mitigating material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	59
	S3-5 – Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	59-60
ESRS G1 Business conduct	Disclosure Requirement related to ESRS 2 GOV-1 – The role of the administrative, supervisory and management bodies	60
	Disclosure requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities	60-61
	G1-1 – Business conduct policies and corporate culture	61
	G1-2 – Management of relationships with suppliers	61
	G1-3 – Prevention and detection of corruption and bribery	62
	G1-4 – Incidents of corruption or bribery	62

# ESRS E1 Climate change

## STRATEGY

### TRANSITION PLAN FOR MITIGATING CLIMATE CHANGE

Like the rest of the business sector, SpareBank 1 Helgeland has a responsibility to reduce its emissions and must contribute to the transition and reduction in emissions in its customer portfolio.

The Bank has developed a number of targets and actions designed to realign its own activities and help our customers realign in order to make them less vulnerable to climate change and the transition to a low-emission society. In order for us to achieve the targets we have set ourselves, we are completely dependent on interactions in the rest of society with market developments, major technological advances and regulatory changes that can drive cuts in emissions. We view these factors as essential contributors to achieving our long-term climate targets. The targets set by the Bank are compatible with the Paris Agreement's goal of net zero emissions by 2050, and through continuous monitoring and adaptation SpareBank 1 Helgeland will do its part to ensure that we are on the right track.

In 2024, SpareBank 1 Helgeland adopted its first transition plan, which contains targets and actions that can be seen under "Actions and resources in relation to climate change policies" and "Targets related to climate change mitigation and adaptation".

No embedded GHG emissions or elevated risk of carbon-intensive assets were identified. This is largely due to the Bank's lending, which is capitalised as an asset on the balance sheet, having terms that expire before such risks will be realised. Many of our customers are likely to have both embedded emissions and carbon-intensive assets. It will be natural to return to this at a later date.

### Stakeholder management

Climate change is a topic in all credit cases involving customers with a commitment of more than NOK 5 million in the corporate market and is part of the dialogue advisers have with customers. Climate change is also a material topic that is being worked on across the SpareBank 1 Alliance and in our contact with the authorities and other stakeholders in society.

## MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

### Impacts, risks and opportunities

SpareBank 1 Helgeland has a negative impact through financing activities that entail GHG emissions and activities that cause harm to nature and biodiversity. In SpareBank 1 Helgeland's carbon report, 99% of the Bank's emissions relate to financed emissions in the loan portfolio, and in total our strategy and business model provides a basis for large amounts of emissions. The Bank has committed to achieving net zero emissions by 2050, which will entail major upheavals for the Bank, customers and business partners. The green transition will present significant business opportunities, especially within product development and advice.

Like other businesses, the Bank has a responsibility to slow climate change down by mitigating climate risk exposure in our own activities and for the Group's customers. We also believe that we have a responsibility to help ensure that the region emerges from the green transition with jobs for everyone and its value creation intact. Financed GHG emissions are both an actual negative impact and a financial risk to the Bank.

SpareBank 1 Helgeland is exposed to both physical climate risk and transition risk. Failing to manage these would constitute a financial risk for the Group through, for example, financing assets that fall in value or end up as stranded assets. This may in turn impact the Group's access to financing in the capital markets and the Group's ability to comply with legal requirements and other market expectations.

The Bank has identified relevant climate risks, both transition and physical climate risks. The identification work was carried out based on the TCFD's methodology, which at the time was the most recognised one. The framework has since become an integral part of IFRS<sup>2</sup> to ensure greater consistency and comparability in climate-related reporting and to provide a clear framework for reporting on climate risks and opportunities related to economic performance and strategy. The main focus is on the loan portfolio and identifying risks since it is here that the Group is most exposed to climate risk. By focusing on the loan portfolio, we can help our customers with their efforts designed to mitigate risk, while reducing our own climate risk and gaining an understanding how this will affect us in the transition to a low-emission society.

<sup>2</sup> <https://www.ifrs.org/news-and-events/news/2023/07/foundation-welcomes-tcf-responsibilities-from-2024/>



Eight risks were identified in this work:

Type of risk	Risk	Impact
Transition risk	Future national and international regulations	Regulations can impact the rental market, reduce the value of things the Bank has collateral in, result in potential market failure, increase insurance costs or make it hard to insure things. The quality of the loan portfolio can also be affected, as can ratings.
	Reputational risk for fisheries and aquaculture	Poorer fish health, more lice, more escapes, changes in market mechanisms that can result in the industry choosing other countries for future aquaculture.
	Reputational risk for agriculture	Reputational risk may arise for agriculture if the industry does not successfully transition in line with national and regional objectives. Risk factors are particularly associated with the use of imported protein sources in feed from risky areas (e.g. soya from Brazil) and a failure to realise Nordland's local food potential.
	Transition capacity of transport	Today, the transport industry mainly uses fossil fuels, although it has started testing alternative solutions. The pace of transition is slow due to a lack of infrastructure for renewables-based power trains. In 2023, electric vehicles accounted for around 15% of the private market in Nordland County, while Helgeland lacks charging stations for heavy transport.
	Transition capacity of building and construction	The building and construction sector in Helgeland mainly consists of small players with fewer resources available for transition.
Physical risk	Chronic and acute climate risk for residential and commercial properties	Heavy precipitation, floods and stormwater, landslides and flash floods, storm surges and rising sea levels, quick clay landslides and other weather events that damage critical infrastructure
	Chronic and acute climate risk for agriculture	Heavy precipitation, floods and stormwater, landslides and flash floods, storm surges and rising sea levels, quick clay landslides and more frequent droughts and water shortages, as well as volatile weather.
	Chronic climate risk for aquaculture	Higher sea temperatures, algae blooms, higher incidence of louse, ocean acidification
	Acute climate risk for transport	Extreme weather events resulting in delayed deliveries and destroyed loads Damaged infrastructure can also increase industry emissions due to the use of alternative routes.

## Scenario analyses

In connection with its climate risk assessment, SpareBank 1 Helgeland conducted an overall qualitative scenario analysis in order to understand the impacts the identified transitional and physical risks can have on the Bank's operations and emissions pathways. The risks are assessed in relation to a low and high emissions scenario in line with the Net Zero 2050 and Current Policies scenarios of the Network for Greening the Financial Systems (NGFS).

Net Zero 2050 is based on the Paris Agreement being achieved and thus global warming being

limited to 1.5°C and net zero emissions being achieved around 2050. It also assumes that sustainability related regulations will be introduced continuously and coordinated to ensure goal achievement. Decarbonisation will be escalated through carbon binding, albeit in a limited form. The scenario includes rapid technological changes. On a general level, it assumes that customers and investors will become more climate conscious and demand more sustainable and climate-friendly products. In this scenario, physical climate risks are relatively low, while transition risks are considered high. This would likely have a direct impact on the Bank's operations.

Transition risk	<p>In recent years, the EU and Norway have implemented a number of comprehensive regulations that mitigate short-term transition risk for the Bank. The regulations and changes may have different impacts on various industries for which the Bank should be prepared. For example, a lack of transition in the building and construction industry, or in agriculture, could result in reputational risk due to insufficient resources to comply with demanding regulations. This will require the Bank to invest in internal resources and service development that can meet this need and drive transition for these parts of the business sector.</p> <p>As a region, Helgeland would probably experience a variety of challenges with salmon lice, the associated fish diseases and poor animal welfare in aquaculture as a result of higher sea temperatures. This would be likely to result in higher operating and investment costs for the industry. The challenges facing the industry would be likely to result in further regulations, fines and similar from the Norwegian Food Safety Authority.</p>
Physical risk	<p>Physical risk is kept relatively low in this scenario since the temperature will not increase significantly. SpareBank 1 Helgeland must nevertheless be prepared for more frequent and more severe weather events (e.g. Storm Hans in 2023, and Storm Jacob in 2024).</p>

Current Policies assumes that only implemented regulations are retained. Fossil sources and high energy consumption would remain dominant in the global picture. In this scenario, rising GHG emissions lead to emissions peaking in around 2080 and global warming of around 3 C. The warming has resulted in irreversible changes to the Earth's ecosystem and climate, such as higher

sea levels and loss of biodiversity. Technological changes will progress slowly and the use of carbon binding will be low. Water will be a scarce resource in large parts of the world, and climate-related conflicts will increase due to poorer food security and living conditions. The scenario thus results in higher physical climate risk compared with Net Zero 2050.

Transition risk	<p>Due to physical climate risks, transition risks would be impacted by these even if the regulatory requirements remained relatively constant. In this scenario, the Bank would risk returns on green loans failing to materialise and experience more frequent instances of impairments or stranded assets as a result of some objects being significantly exposed to physical climate risk. The aquaculture industry would be impacted by higher sea temperatures, which in turn would reduce animal welfare and increase reputational risk for cod and salmon production. Coupled with a significant deterioration in global food security over the long term, the availability of critical factor inputs for Norwegian agriculture could be impaired (soya in feed) and local alternatives fail to materialise. In total, this could impact the reputation of the region's food production and ultimately consumer confidence. In this scenario, the building and construction industry and the transport industry are not being transitioned and would continue to depend on fossil fuels. The Bank's transition services would not reach these sectors.</p>
Physical risk	<p>For Helgeland, four physical climate risks are highlighted as likely for Nordland County in particular: extreme precipitation; flooding due to rain; landslides, flash floods and sludge slides; and storm surges.</p> <p>It is estimated that annual precipitation in Nordland would increase by 20%, which includes a significant increase in the intensity and frequency of heavy precipitation throughout every season. The greatest damage to buildings and infrastructure often occurs in connection with stormwater, which is caused by a lot of rain in a short period of time. If stormwater is not taken account of in land-use planning, the erosion risk will be significantly greater due to the speed of the water across impermeable surfaces. This could result in varying degrees of major damage to local infrastructure, properties, agriculture, aquaculture and other industries. Stormwater could also impact aquaculture due to an increased likelihood of pollutants spreading via run-off and reductions in salt content.</p> <p>The largest increases in flood magnitude in Norway would mainly be found in Western and Nordland, with an increase of up to 40-60% in some places. Towards the end of this century, Nordland County may experience a change in the magnitude of 200-year floods of up to 28.8%, where Helgeland will experience the largest increase, especially in the Vefsna, Ranavassdraget/Ranelva and Røssåga water systems. Critical infrastructure is located close to these waterways, which could result in substantial social costs should an incident occur here.</p> <p>Landslides and flash floods can occur throughout the region due its topography. Some areas of the region are more vulnerable than others. For example, Leirskarddalen and Dunderlandsdalen are areas exposed to the risk of landslides and flash floods, where the latter in particular can cause major damage to important infrastructure (European route E6 and the Nordland Rail Line). This does not exclude landslide and flash flood events elsewhere in the region along important infrastructure for the transport industry or for agriculture in the region.</p> <p>It is also thought likely that quick clay slides, droughts, ice drift and avalanches could potentially increase.</p>

## The property portfolio's exposure to physical risk

Long-term assessments of the Group's risk exposure are difficult due to access to, and the quality of, data, as well as the uncertainty associated with predicting outcomes over time. Northern Norway is particularly vulnerable to rising sea levels and storm surges. In 2023, the Group gained access to map data from the Norwegian Water Resources and Energy Directorate (NVE) and Norkart, which Eiendomsverdi AS has linked to properties. This risk mapping includes data points for all mortgaged objects with the loan balance and risk of storm surges, sea level rise, floods, rockslides, mountain slides and quick clay slides appended. The map data also identifies caution areas for floods and avalanches. The types of risk are divided into acute and chronic risks. The use of map data when granting credit will be key in reducing the risk of stranded assets. Loss due to natural disasters is covered by insurance but can result in reductions and lower market value. The Group is exposed to loss due to natural disasters through our stake in SpareBank 1 Gruppen and falls in market value. Fremtind's insurance portfolios are well diversified but natural disasters represent a concentration risk. Exposure in Norway is limited through the Norwegian Natural Perils Pool. The Group has identified balance sheet exposure related to acute and chronic climate risk and through due diligence.

### Acute climate risk

Acute climate risk involves the risk of injury or loss due to extreme weather events such as storms, floods, landslides and droughts. These events could be exacerbated by climate change and have negative impacts for nature, society and the economy. It is important to map the exposure of different sectors, regions and businesses to mitigate acute climate risk, as well as to take actions that increase resilience and preparedness. Acute climate risk comprises many risk types with different likelihoods for triggered events and their severity. Analyses of the most important map layers for acute physical risk show that overall the Group's mortgaged properties had an exposure of NOK 3 109 million in 2024, which constituted 11.4% of the loan balance for all collateral objects to which the Group had exposure. Examples of actions designed to mitigate acute climate risk could include better flood protection, structural improvements to withstand storms and the development of emergency response plans for managing landslides and droughts.

### Chronic climate risk:

Chronic climate risk refers to the risk of injury or loss resulting from long-term climate change impacting nature, society and the economy. Higher sea temperatures and greater glacial melting increases the risk of rising sea levels along the Norwegian coast, which could threaten coastal

areas, islands, cities and infrastructure with flooding, erosion and saltwater ingress. Analyses of the most important map layers for chronic physical risk show that overall the Group's mortgaged properties had loan exposure of NOK 732 million at the end of 2024, which constituted 2.7% of the loan balance for the collateral objects to which the Group had exposure. Examples of actions designed to mitigate chronic climate risk could include long-term strategies for coastal protection, land use planning and management to avoid exposed areas and investments in infrastructure that can withstand long-term climate change.

### Due diligence:

Analyses of the map layers subjected to due diligence show that overall the Group's mortgaged properties had an exposure of NOK 3.7 billion in 2024, which constituted 13.8% of the loan balance for all collateral objects to which the Group had exposure. The map layers subjected to due diligence indicate that the areas may be exposed to different types of risk, although what level of risk has not been defined. According to NVE, these maps are suitable for overarching land-use planning and risk analyses, but not for detailed development or flood protection. Due diligence can help with identifying and understanding potential risks before they become serious problems and with making informed decisions concerning investments and risk mitigation actions.

### The property portfolio's exposure to transition risk

As at year end 2024, the Bank had started work on developing a model for quantifying transition risk, initially for residential and commercial properties. The results of this will be published at a later date.

## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

### DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL CLIMATE-RELATED IMPACTS, RISKS AND OPPORTUNITIES

See "Description of the processes to identify and assess material climate-related impacts, risks and opportunities" in the chapter on ERS2 General Disclosures.

### POLICIES RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

Governance documents, policies, etc. specify how the Bank's work on achieving its climate targets should be operationalised. Examples of these include the RM strategy, CM strategy, risk and capital strategy and finance policy. Limiting emissions is also reflected in governance

documents for employees and operations, in the code of conduct, in the company agreement between the Finance Sector Union of Norway and SpareBank 1 Helgeland, and the Bank's climate transition plan for net zero in 2050.

## **ACTIONS AND RESOURCES IN RELATION TO CLIMATE CHANGE POLICIES**

The Bank has taken a number of actions designed to address both positive and negative impacts from climate change. Operationalising sustainability ambitions through specific actions has an impact on the Group's financial planning, prioritisation of strategic goals, product and service portfolio, employees, requirements and expectations for suppliers, operational activities, etc. Furthermore, a fast pace of change is expected with respect to regulatory framework conditions going forward, which will increase insights and data on climate and nature-related risks in the future.

### **General actions for reducing GHG emissions**

SpareBank 1 Helgeland has set itself a goal of achieving net zero emissions by 2050 through a number of actions in our own activities, investments and loan portfolio. These actions are not complicated to specify and implement in the Bank's own activities. In relation to this, we can take targeted actions such as increasing energy efficiency, converting to renewables and transitioning to a zero-emission fleet.

When it comes to scope 3 emissions in the loan portfolio, we face major challenges and uncertainty. Product and service development has started in order to reduce these emissions, although we currently have limited experience of these and it is also difficult to measure the impact of these actions at this time. This is why access to reliable data will be crucial in the years to come.

Furthermore, we are dependent on market developments, technological advances and regulatory changes that can drive further emissions cuts. These factors are crucial contributors to achieving our long-term climate goals. Through continuous monitoring and adaptation, SpareBank 1 Helgeland will work to ensure that we are on the right path to net zero emissions in 2050.

### **Actions**

**Scope 1** emissions are the emissions from the Bank's vehicle fleet, which currently consists of seven vehicles. The Bank has decided that all of the vehicles that will be purchased when these are replaced must be zero-emission vehicles. The vehicles will be replaced after a certain number of kilometres have been driven. An estimate has been prepared that suggests all of the vehicles will be replaced in 2028.

**Scope 2** emissions are emissions from the consumption of electricity and district heating in the Bank's four buildings. The head office in Mo i

Rana has recently been renovated and certified as BREEAM In-Use<sup>3</sup> and its energy efficiency has been significantly improved. In Mosjøen, parts of the bank building will be renovated. Energy efficiency will be an important focus area. An analysis from Multiconsult of solar power production on the roof has been carried out, although no final decision has been made about whether or when to invest in this in order to improve energy efficiency. A continued focus on energy efficiency will be key in this renovation project.

**Scope 3, loan portfolio:** GHG emissions from the loan portfolio account for 99% of the emissions in the Bank's carbon report. In addition to the Bank's efforts to reduce emissions from its own activities, it is crucial to focus on reducing emissions from the loan portfolio, as this will have the greatest impact on our overall carbon footprint. By setting ambitious goals and taking action to reduce emissions from the loan portfolio, the Bank can help achieve both national and global climate targets.

The Bank has initially concentrated on taking action in relation to the most emission-intensive industries in the portfolio, as well as residential and commercial properties. Residential and commercial properties account for 78.3% of the Bank's loan portfolio, although they account for a smaller share of GHG emissions. However, it is important to work on buildings' energy efficiency to free up energy for the decarbonisation of other sectors, and to manage ESG risk in such a large proportion of the Bank's loan portfolio. The most emission-intensive industries in the Bank are agriculture, aquaculture, fishing and hunting, building and construction and maritime transport. These categories plus residential and commercial properties account for 85% of the emissions in the Bank's emissions portfolio. Therefore, in our work on product and service development, we will focus our efforts on these industries, as well as residential and commercial properties.

### **General actions for emissions in the loan portfolio**

Some actions are important for all industries. Commitments greater than NOK 5 million must be assessed using the Bank's ESG model to assess the customer's ESG risk. Through skills and product development in the Alliance, we will ensure that the Bank benefits from shared resources, knowledge and expertise. In addition, the job of collecting reliable emissions data from customers is just starting, although this will be important for the further development of actions in the years to come. Knowledge, data quality, products and services that contribute to transition will therefore be a common thread in the industries.

### **Agriculture**

The Bank has four actions designed to help agricultural customers cut emissions:

<sup>3</sup> <https://byggalliansen.no/sertifisering/om-breeam-in-use/>



1. **Data:** The Bank has many customers who use the agricultural climate calculator. When the data becomes even more reliable, it will be relevant for the Bank to obtain it and use it as a knowledge base for customer advice on how to improve resource efficiency and reduce emissions. This could also contribute to better measurements of the effects of actions at a user level. This in turn could contribute to more accurate measurements of status and the effects of actions.
2. **Requirement to use a climate calculator** In 2025, the Bank will introduce a requirement to use the agricultural climate calculator when entering into new or significant renewals of commitments.
3. **Acceptable result in ESG module:** When the ESG module is used to assess a customer's risk prior to a new commitment being signed, a red score (high risk) indicates policy breaches that must be addressed in committee. Documented actions are then expected to be taken to reduce the ESG risk to a satisfactory level.
4. **Products and services:** A number of products, services and incentive programmes have been developed to help customers reduce their GHG emissions.
  - If customers use and update the climate calculator regularly and have a documented and signed climate plan prepared in consultation with an authorised adviser, they will qualify for green operating credit.
  - Investments in low and zero-emission technology that improves efficiency and reduces environmental impact.
  - Products and/or services that significantly improve energy efficiency in drawing water, irrigation and other aspects of agricultural and livestock operations.
  - Establishment of biogas facility.
  - Generally good agronomy, with ditches, fertiliser use (both better efficiency and use of farmyard manure), a focus on improving or not depleting existing carbon reservoirs, etc. It must be possible to document this.

## Maritime transport

The Bank has two main actions designed to help cut maritime transport emissions:

- **Data:** The Bank will request detailed climate information about the vessels we have helped finance. This could also contribute to better measurements of the effects at a vessel and company level. This in turn could contribute to more accurate measurements of status and the effects of actions.
- **Products and services:** A number of products,

services and incentive programmes have been developed to help customers reduce their GHG emissions. Vessels dedicated to the transport of fossil fuels are not eligible. Vessels operating zero-emission passenger or freight transport or vessels with zero direct carbon emissions are eligible. The same is true for infrastructure that supports this (e.g. charging infrastructure, port operations and reloading infrastructure).

## Fishing, hunting and aquaculture

The Bank has three main actions designed to help customers transition to more climate-friendly activities:

- **Data:** The Bank will strive to obtain more detailed data from the companies' carbon accounting. This will make it possible to provide better ESG advice and customer follow-up. In the aquaculture industry, a number of companies have access to good data, and we want to make use of this.
- **Products and services:** A number of products, services and incentive programmes have been developed to help customers reduce their GHG emissions.
  - Certified organisations, facilities or seafood products within the fisheries industry that provide internationally recognised certification.
  - Various activities that are certified according to internationally recognised certification.
  - Products/services that result in significant improvements in energy efficiency or the marine environment in aquaculture and processing facilities.
- **Advice:** SpareBank 1 Helgeland expects aquaculture customers to consider the environment and sustainability in all credit matters. Focus on sustainable feed, zero or low-emission solutions and relevant environmental certifications are key areas. The Bank provides support through advice and engagement that promotes climate-friendly choices in the industry. The Bank believes it is very important that our advisers maintain close contact with customers. This ensures that the Bank can play an active role in its customers' sustainable transition, and that together we can find solutions that combine profitability with climate responsibilities.

## Building and construction

The Bank's initiatives focus on products with reasonable interest rates that will contribute to a green transition in this industry:

- **Data:** The Bank needs more detailed data about its customers' GHG emissions in order to measure the status and effects of actions in the loan portfolio. This is crucial for providing good

advice.

- **Products and services:** A number of products, services and incentive programmes have been developed to help customers reduce their GHG emissions.
  - Projects that implement circular economic principles, such as the reuse of construction materials or waste minimisation.
  - Fossil-free construction sites.
  - Purchases of zero-emission construction machinery.
- **Advice, requirements and expectations:** Advice is an important service for the Bank's customers in the building and construction industry. The Bank must ensure that our advisers have the necessary knowledge and expertise about what requirements and expectations customers will face in their dealings with public and private actors. We have clear expectations for customers. These include them having to focus on the electrification of construction sites, good waste management and routines for source separating filling materials. The Bank wants to do what it can to help customers such that they are able to satisfy industry requirements while remaining competitive in the market. We want to support our customers in their transition efforts through good engagement.

## Residential properties

A number of actions have been taken to contribute to the transition of the Bank's residential property portfolio and cut its emissions:

- **Data:** We constantly strive to improve data quality in order to obtain reliable data from the Bank's mortgaged objects. SpareBank 1 Helgeland believes increasing the proportion of energy labelled properties in the portfolio is an important goal. This provides the Bank with a better basis for measuring the status of energy use and GHG emissions and for being able to evaluate the effects of actions in the future.
- **Advice:** SpareBank 1 Helgeland must ensure that our advisers have the necessary expertise to advise customers on topics such as energy labelling, support schemes, new regulations and managing and developing homes in a more climate-friendly way. Advisers must be able to provide advice on how changing consumption patterns can reduce energy consumption and lower costs for customers.
- **Products and services:** The Bank offers affordable loans for green homes. Renovation loans are also offered for homes that reduce their energy consumption by at least 30%, or if the home is at least 70% self-supplied by renewable energy.

## Commercial properties

A number of actions have been taken to contribute to the transition of the Bank's commercial property portfolio and cut its emissions:

- **Data and requirements for energy certificate:** SpareBank 1 Helgeland believes increasing the proportion of energy labelled properties in the portfolio is an important goal. This provides the Bank with a better basis for measuring the status of energy use and GHG emissions and for being able to evaluate the effects of actions in the future. Energy labelling also provides customers with valuable insights into their property's energy and environmental performance, which can enhance both the value and competitiveness of properties.
- **ESG module:** The model assesses property rental and development, particularly with respect to physical climate and transition risks. It focuses on the property's exposure to physical climate risk and transition risk, its energy label, whether the customer has the financial capacity to improve its energy efficiency and its owner's focus on this.
- **Advice:** SpareBank 1 Helgeland must ensure that advisers have the necessary expertise to assist customers with energy labelling, energy advice and adapting to current and future requirements. This includes advice on how customers can get an energy label and support with implementing energy measures that improve both environmental performance and value development.
- **Products and services:** In the area of commercial properties, reasonable loans are offered for green commercial buildings that meet criteria in line with the Taxonomy or that have obtained a recognised certification and energy label of A/B. Renovation loans are also offered to commercial buildings that reduce their energy consumption by at least 30%, or if the building is at least 70% self-supplied by renewable energy.

## Other industries

The other industries and sectors have lower emissions or are industries to which the Bank has little exposure and that the first version of the climate transition plan did not particularly focus on. However, products and services will be developed over the next few years that will be relevant for more of our corporate customers. Requirements in public tender competitions, changes to the law and regulations, and requirements for suppliers can contribute to emissions cuts and energy efficiency through various value chains.

## Other categories in scope 3

SpareBank 1 Helgeland has a high degree of control over the emissions in several of the categories in scope 3. The most obvious are commuting, waste

and business travel. We have access to good data on these and it is possible to take actions.

## Commuting

SpareBank 1 Helgeland operates in a market area that is not commuter friendly for those who want to travel by public transport. This means the vast majority of employees commute to work by car. The proportion of employees with zero-emission vehicles increased from 36% in 2023 to 42% in 2024. The Bank obtained statistics on new car sales and re-registrations in the country in 2024. The figures show that of all new car sales in 2024, 88.5% were zero-emission vehicles. Of the re-registrations in the year, 20.8% involved zero-emission vehicles. Analysis also shows that on average Norwegians replace their car every 11 years. There have been strong signals from the EU that sales of new cars with petrol and diesel engines will cease in 2035. If we assume that after 2035, 100% of new car sales will be sales of zero-emission vehicles and that the proportion of zero-emission vehicles re-registered each year will increase by 5% due to more zero-emission vehicles in the market, the country's vehicle fleet will be 100% zero-emission in 2040. We have therefore not established any actions for this category.

## Waste management

In connection with renovating its head office, the Bank put reuse on the agenda. Furniture and fixtures were refurbished and reused, and some things were given away. This focus has been continued and become routine in our organisation. This helps reduce waste and promotes the sustainable use of resources.

## Business travel

The Bank has taken steps to reduce travel in the organisation. In 2024, a new business travel policy focused on reducing both costs and emissions came into effect.

The business travel policy is intended to ensure that necessary travel activities are planned and implemented with an awareness of cost and the environment. The intention is to reduce the Bank's business travel and encourage people to choose more eco-friendly transport solutions.

## METRICS AND TARGETS

### TARGETS RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

#### The Group's overall objectives related to climate change mitigation and adaptation

- SpareBank 1 Helgeland must help customers to make climate-friendly choices.
- SpareBank 1 Helgeland must maintain an overview of the climate risk in our market area and portfolio.

- SpareBank 1 Helgeland must include climate risk as an integral part of our risk assessment processes.

## Scope 1, 2 and 3 targets and actions

SpareBank 1 Helgeland has operational control over emissions in scopes 1 and 2. The targets are in line with the Paris Agreement's goal of preventing global warming exceeding 1.5°C. The targets are also in line with Norway's national targets for 55% cuts in 2030 (compared with emissions in 1990), and climate neutrality in 2050. Scopes 1 and 2 must achieve these targets, individually and collectively.

### Connection between the Bank's scope 3 climate targets and the goal of limiting global warming to 1.5°C

Science-based targets for scope 3 underlie an ambition to limit global warming to well below 2°C in its short-term goals. This entails a less ambitious level of reductions than those for scopes 1 and 2, mainly due to uncertainty regarding data quality and the challenges of collecting consistent emissions data across the value chain. This is not viewed as the end destination, rather it represents opportunities to be both ambitious with limited data and gradually improve data quality. This will provide a good basis for even more accurate emissions calculations as we move into the next phase for the long-term targets.

In connection with the Bank's carbon report, the Group has set itself targets for its own activities and the loan portfolio in the medium and long term. In addition to the overarching climate targets, the Bank has specified targets within scopes 1, 2 and 3. Together with actions designed to achieve them and other drivers of emissions cuts in society, this will help the Bank achieve climate neutrality by 2050.

Year	Scope 1	Scope 2	Scope 3
2030	Net zero emissions	Reduce emissions by 55%	2.5% annual cut
2040	-	Reduce emissions by 90%	
2050	-	Net zero emissions	Net zero emissions

It is important to stress that the targets set out in the carbon report are intensity targets. In order to understand whether the actions are having an effect, they must be seen in light of the extent of activity in the company. Therefore, these intensity targets take account of the gross lending in NOK millions. The extent to which targets have been achieved in relation to scopes 1, 2 and 3 is shown in our presentations in the carbon report.

#### Target:

- SpareBank 1 Helgeland wants to improve the data quality of the presented carbon report for scopes 1-3 in line with the GHG Protocol.

- Retail market (RM): The following goals apply to green mortgages:
  - 100% of mortgages for new build homes.
  - The proportion of loans for refurbishments that ensure homes are aligned with the Taxonomy will increase every year.
  - The proportion of mortgages for homes that are aligned with the Taxonomy will increase every year.
- Corporate market (CM): Lend at least NOK 200 million to projects that qualify for green loans every year.
- Reduce the proportion of properties in which the Bank has collateral without a registered energy label by 5% every year.

### Achievement of targets in 2024:

We lent more than NOK 205 million to green projects that qualified for green loans in CM in 2024.

We increased the proportion of mortgages for homes aligned with the Taxonomy from NOK 1 981 million in 2023 to NOK 2 294 million in 2024

We reduced the proportion of properties in which the Bank has collateral but that do not have a registered energy label by 5% in 2024.

We developed and approved the Bank's first version of the transition plan in 2024.

## SCOPE 3 TARGETS BY INDUSTRY

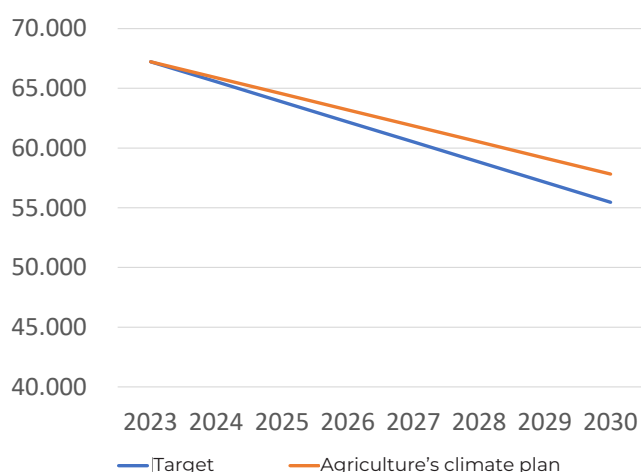
### AGRICULTURE

Norwegian agriculture has a long tradition in Helgeland and is an industry that makes significant contributions to value creation and employment throughout Helgeland. It is an industry that assumes a huge social responsibility by safeguarding national food security in Norway with proud Norwegian traditions. Norwegian farms are generally family-owned and passed on through inheritance. The steward mindset entails leaving a farm in a better state than it was in when you took over, and is prominent in agriculture. This is a good starting point for taking a long-term approach in a highly adaptable industry that already uses little antibiotics and chemicals, has good animal welfare and plant health and is part of a transparent value chain. Agriculture is the most emission-intensive industry in the Bank. It is also an industry that is already noticing the impacts of climate change. Warmer temperatures can result in longer growing seasons, although wetter and more extreme weather events can also destroy crops or reduce quality. When we set targets and develop initiatives, we do so based on agriculture's climate plan.<sup>4</sup> This means that the Bank bases its work on the sector's own emissions targets shown in the fact box.

### FACT BOX:

On 21.06.19, the Norwegian Farmers Union and Norsk Bonde- og Småbrukarlag (the Norwegian association for farms and smallholdings) signed a letter of intent with the government on reducing GHG emissions and increasing carbon uptake within agriculture in the period 2021-2030. Agriculture's climate plan focuses on reducing GHG emissions through better animal welfare, better fertiliser management, more use of renewable energy and efficient operating methods. The goal is to achieve significant reductions by 2030. The plan is supported by all of agriculture in Norway, and the revised plan aims to cut emissions by 4-6 tCO<sub>2</sub>e by 2030. This represents an annual percentage reduction of 8-13%.

### Agriculture



### Dependencies and dilemmas

There are many activities that the Bank is not directly involved in but that are important for our agricultural customers' emissions. Research and development into methane inhibitors in feed could contribute to major reductions in emissions. The same may be true for any establishment of biogas facilities in the Bank's market area. The Bank's agricultural advisers must be up-to-date on industry developments such that customers can take advantage of new opportunities and technology developments. A lack of data is also a challenge since we currently find it difficult to measure the effects of actions. Nevertheless, the Bank has chosen to provide financing for actions that will result in obvious climate benefits, although it may take some time before we can measure the effects of these.

### MARITIME TRANSPORT

The Bank's loan portfolio in maritime transport is not complicated and consists of financing vessel types that are among the most suitable for the

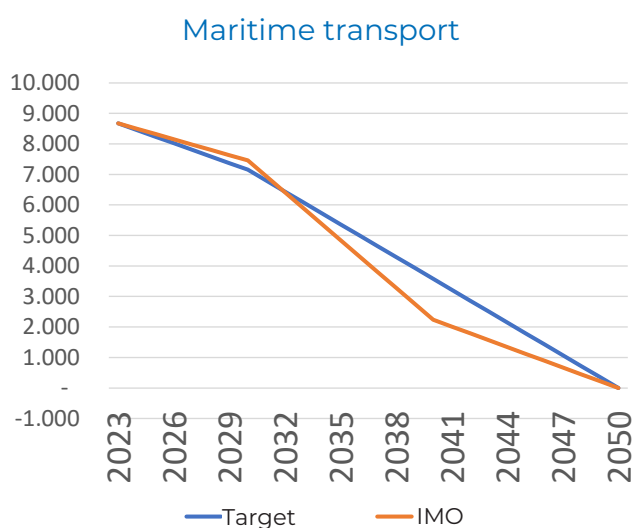
<sup>4</sup> <https://www.bondelaget.no/bondelaget-mener/miljo-og-klima/klima/landbrukets-klimaplan-pdf/>

<sup>5</sup> <https://www.sustainable-ships.org/rules-regulations/imo>

<sup>6</sup> <https://www.rederi.no/nyheter/budsjettthoring-2024-differansekontrakter-blir-helt-sentralt-for-a-lykkes-med-klimamalene/>



green transition. Our targets align with the IMO goals.<sup>5</sup>



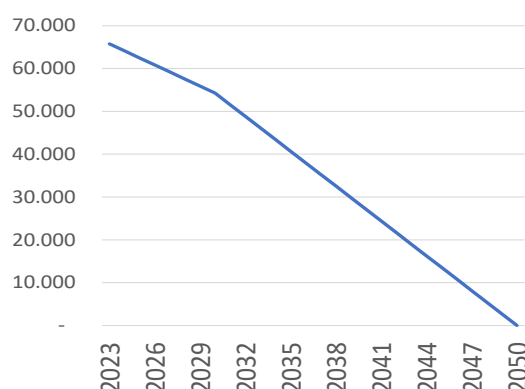
### Dependencies and dilemmas

The technological advances in vessel development and low and zero-emission solutions are crucial to achieving the goals of more eco-friendly transport and business activities. The Bank has a limited impact on this. Trade organisations, such as the Norwegian Shipowners' Association, have demanded greater support from the authorities to accelerate development.<sup>6</sup>

### FISHING, HUNTING AND AQUACULTURE

Fishing and catching wild fish and aquaculture have the potential to help reduce emissions, nationally and globally. The emissions are low compared with other forms of protein production. Fisheries and aquaculture are already experiencing the effects of climate change. With rising sea temperatures, the aquaculture industry is facing major challenges due to salmon lice. This is a direct threat to their growth ambitions.<sup>7</sup> Within fisheries, we have seen a decline in important stocks and an accompanying decline in quotas in recent years, and this decline may continue. The decline in stocks represents a credit risk for our customers and the Bank when quotas have to be reduced.

#### Objective for fisheries and aquaculture



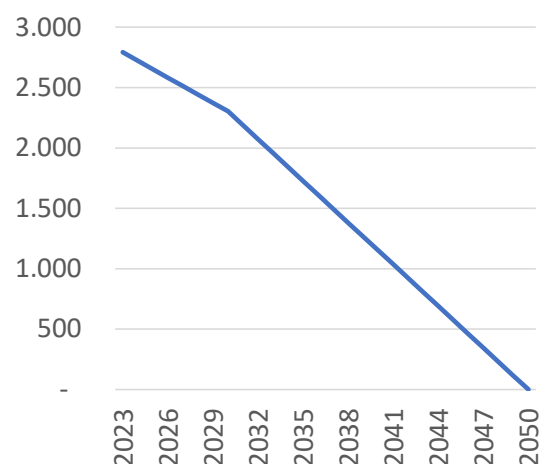
### Dependencies and dilemmas

Technological advances in the industry, regulatory risks and framework conditions will impact this industry. This means that there is a lot that the Bank has no influence over but that will impact the industry's emissions and development. As the decline in fishing quotas in recent years has shown, biological and environmental factors will play a large role in corporate customers' profitability and capacity for transition.

### BUILDING AND CONSTRUCTION

The building and construction industry in Helgeland is characterised by many SMEs. The building and construction sector is responsible for major emissions, both from machinery and the consumption of materials. Globally, the building and construction industry accounts for 40% of all CO2 emissions, 40% of energy consumption and 40% of waste. A high level of renewable energy means that in Norway the industry accounts for 15% of GHG emissions. Annual value creation is estimated at about NOK 350 billion, with 60% linked to public sector customers.<sup>8</sup> The government's new amendment regulation, which assigns a minimum of 30% weight to climate and environmental considerations in public procurements from 01.01.24, represented a significant shift.<sup>9</sup> Therefore, multiple customers now face major challenges complying with requirements in order to remain relevant.

#### Objective for building and construction



### Dependencies and dilemmas

The building and construction industry is impacted by government guidelines, government tender competition rules and technological advances over which the Bank has no control. The requirement for fossil-free construction sites by 2025 and emission-free ones by 2030, coupled with high investment costs and uncertainty about technology is creating challenges for our customers.

<sup>7</sup> <https://trafikklyssystemet.no/>

<sup>8</sup> Bærekraftig kjøp av bygg og anlegg | Anskaffelser.no

<sup>9</sup> Veileder til regler om klima- og miljøhensyn i offentlige anskaffelser - 1. Introduction | Anskaffelser.no

<sup>10</sup> [https://www.bnl.no/siteassets/dokumenter/rapporter/klimautslipp\\_bae\\_2019.pdf](https://www.bnl.no/siteassets/dokumenter/rapporter/klimautslipp_bae_2019.pdf)  
<https://byggalliansen.no/kunnskapssenter/publikasjoner/infopakkeklimakjempen/#1610543721156-39143120-001d>

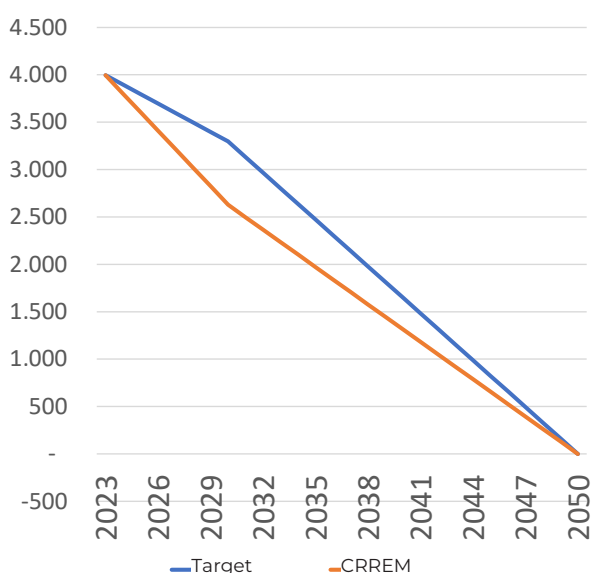
In order for SpareBank 1 Helgeland to achieve its climate targets, we are dependent on the industry adapting to these guidelines and public stakeholders and technological advances helping to make the transition possible. The Bank will continue to help customers meet these challenges through financing and advice.

## RESIDENTIAL PROPERTIES

Some 73% of the Bank's loan portfolio is exposed to housing. While these loans account for just 2.1% of the Bank's total emissions due to the high proportion of renewables in the Norwegian electricity mix, it is still important to work on energy efficiency to free up energy for the decarbonisation of other sectors. The energy consumption in the operations phase drives emissions, although so does the construction process and selection of materials in the construction phase. 40% of energy consumption and 40% of the consumption of materials come from the use and construction of buildings.<sup>10</sup> Through energy efficiency, transitioning to renewable energy sources and other actions, the carbon footprint of homes can be reduced by 2050. Emissions must be reduced by 48% from their 2023 level by 2030 in order to align with the CRREM target pathway. This will require comprehensive energy efficiency improvements to, and renovations of, our customers' homes. The EU's Revised Energy Performance of Buildings Directive was approved during the year. This aims for a 16% reduction in energy consumption by 2030 and 20-22% by 2035. This is an important framework that provides guidelines for future developments. There is some uncertainty about how the Norwegian authorities will implement the directive. But whatever happens, it entails a risk for the sector's costs and development of value.

Climate risk is a material topic, particularly physical climate risk. These are areas that involve a risk of avalanches, floods, rising sea levels and landslides. Transition risk, such as energy labelling requirements and the EU's Energy Performance of Buildings Directive, will also have a greater impact going forward and require adaptation on the part of both customers and the Bank.

### Residential properties



## Dependencies and dilemmas

In order for SpareBank 1 Helgeland to help achieve the energy efficiency targets for housing, we are dependent on a number of external factors over which we as a Bank have limited influence:

- Public support mechanisms that facilitate financial support for homeowners looking to upgrade their home.
- The future energy mix and emission intensity of the electricity delivered to Norwegian households. Regulatory requirements, such as the implementation of the EU's Energy Performance of Buildings Directive, which will impact requirements for homes in Norway.
- Electricity prices and economic carrying capacity, where higher electricity prices may encourage energy initiatives, although they also put financial pressure on customers.
- Access to resources, including enough labour and materials to implement necessary energy efficiency measures.
- Data and technology, where access to the correct information about energy labelling and the development of new, innovative solutions are essential for reducing emissions from homes.

We recognise that many of these challenges could be demanding for our customers. Therefore, the Bank has taken an approach that is about doing what we can to support customers rather than setting absolute requirements that may result in exclusion. Through targeted advice and financing solutions, we want to help customers understand, adapt to and meet the new requirements while helping ensure sustainable development in the housing market.

## COMMERCIAL PROPERTIES

Some 9.5% of the Bank's loan portfolio is exposed to commercial properties. These buildings are consistently less energy efficient than homes, although like homes they account for a low proportion of the Bank's total emissions due to the high proportion of renewables in the Norwegian electricity mix. It is also important to work on energy efficiency to free up energy for the decarbonisation of other sectors. Through energy efficiency, transitioning to renewable energy sources and other actions, the carbon footprint of commercial properties can be reduced by 2050. Emissions must be reduced by 44% from their 2020 level by 2030 in order to align with the CRREM target pathway. This will require comprehensive energy efficiency improvements to, and renovations of, commercial properties. SpareBank 1 Helgeland will actively work with customers to reduce energy consumption and contribute to the sustainable development of commercial properties. The EU's Revised Energy Performance of Buildings Directive is an important framework that will steer

developments. There is some uncertainty about how the Norwegian authorities will implement the directive. This, coupled with stricter requirements from public tenants, energy labelling and other regulations, constitutes a transition risk for customers. Climate risk is also a material topic, particularly physical climate risk. These are areas that involve a risk of avalanches, floods, rising sea levels and landslides.

### Commercial properties



### Dependencies and dilemmas

In order for SpareBank 1 Helgeland to help achieve the energy efficiency targets for commercial properties, we are dependent on a number of external factors over which we as a Bank have limited influence: Regulatory requirements from government, energy costs and available incentive and support mechanisms will impact the extent to which these targets can be realised. The Bank will actively contribute through financing and advice to help our customers transition their properties in line with national and international climate targets.

However, we recognise that this transition must take place in a profitable and sustainable way for our customers. It is also crucial that SpareBank 1 Helgeland has products and services that meet property customers' needs going forward. We currently offer green corporate loans, although it is clear to us that further product development is needed to support customers with their climate work and transition.

### Balance of green loans in the customer portfolio as at 31.12.24:

- Balance of green loans for homes: NOK 449 million (NOK 187 million).
- Balance of green corporate loans: NOK 377 million (NOK 172 million).

The loans have criteria that align with the green activities in Article 8 of the Taxonomy Regulation, and must help customers make green choices, improve the energy efficiency of homes and commercial properties and reduce emissions.

In the first half of 2025, SpareBank 1 Helgeland will introduce a new product framework that will be tailored to each industry.

### ENERGY CONSUMPTION AND MIX

The Bank's energy consumption is linked to the electricity consumption in the four locations where the Bank has branches, as well as the consumption of petrol and diesel by the Bank's vehicle fleet.

All energy consumption in the Bank comes from fossil sources.

	MWh
Diesel	28
Petrol	6
Electricity	1 396
District heating	647

### GROSS SCOPES 1, 2, 3 AND TOTAL GHG EMISSIONS

SpareBank 1 Helgeland's carbon report is based on the international standard A Corporate Accounting and Reporting Standard developed by the Greenhouse Gas Protocol Initiative (GHG Protocol).

SpareBank 1 Helgeland has chosen "operational control" as its control approach for its carbon report. This means that the company reports on emissions based on its own activities and the equipment over which it has control. SpareBank 1 Helgeland is a relatively small group, and this provides the best overview and control with respect to ensuring completeness and accuracy.

### Changes to the carbon report for 2023

Following publication of the Annual Report 2023, material errors were identified in the calculation of scope 3 emissions. This resulted in the Bank publishing a new carbon report in the sustainability library on the Bank's website.

In 2024, we improved the data quality of estimated emissions for agricultural customers with data on the number of animals and area of cultivated land from the public grant register. The SpareBank 1 Alliance has also established an Alliance cooperation for calculating emissions in loan portfolios to ensure comparability within the Alliance and to improve emission calculation skills. This means that we have recalculated emissions in category 15 to ensure the same methodology was used for 2023 and 2024.

The Group has also identified two new categories in scope 3 in the carbon report as material in 2024. These are category 3: Fuel- and energy-related activities not included in scope 1 or scope 2, and category 12: End-of-life treatment of sold products. Category 3 emissions are in practice the emissions

related to the production of the fuel and electricity in scopes 1 and 2, and category 12 emissions are in practice the emissions related to issued bank cards.

### Base year and recalculation of the carbon report

Since the last sustainability report, SpareBank 1 Helgeland has changed the base year for all of the carbon accounting from 2022 to 2023. This was due to the aforementioned Alliance cooperation on calculating emissions in the emissions portfolio. 2023 was a year of normal operations and will provide a good basis for comparisons with future years. SpareBank 1 Helgeland wants to take an active approach to its carbon accounting and is always working to become a better resource-saving and environmentally-efficient organisation by setting requirements for its own organisation, suppliers and partners.

The Bank's practice for restating the base year is in line with the GHG Protocol and identifies three activities that trigger restatement:

1. Structural changes. These could be, for example, the acquisition, merger or sale of material assets.

2. Changes in calculation methods or improvements in the accuracy of emission factors or activity data. These could be, for example, access to more accurate data that significantly improves data quality and that can be restated retrospectively. This will only be relevant if it results in a better understanding of emissions and the potential for cutting them.
3. Occurrence of gross errors. Here, the Bank sets a limit at 5% as a significance threshold. This is common practice among many companies.

### Location-based versus market-based method

The Bank has chosen to use a location-based method over a market-based approach for goals and strategic planning in light of the carbon report. The most important factor here is that, compared with others, the uniform electricity mix in the NO4 region, which entails a high degree of consistency in the energy sources used. Limited imports/exports of electricity generated using fossil sources and a high proportion of renewables in the region ensures that the strategies are aligned with the specific environmental conditions in the Bank's geographical market area.

### Method for calculating scopes 1, 2, and 3 emissions.

Category	Method	Weaknesses in the method	There are plans to move up in the data quality hierarchy
<b>Scope 1</b>			
Emissions from fuel, petrol and diesel	Primary data on fuel consumption, fuel type and km travelled in the organisation has been collected. The emission factor for fuel was obtained from Finance Norway's guidelines for calculating financed emissions, page 38.	The method does not take into account vehicle-specific parameters such as engine size and model year. Nor does the method take into account the addition of biofuels to Norwegian petrol and diesel	There is no plan to allocate resources to improving data quality since the Bank's vehicles will be replaced by zero-emission vehicles by 2030
<b>Scope 2</b>			
Location-based emissions electricity, Norwegian mix	Data on energy consumption (power and electricity) is collected and represents precise primary data. The emission factors used are the Norwegian mix issued by the NVE.	The method does not take into account regional differences in emission factors. The NO4 electricity mix includes less imports of electricity generated using fossil sources. This is poorly reflected when national mix figures are used.	This results in the highest possible data quality, without auditing.
<b>Scope 3</b>			
Category 1: Purchased goods and services	Spend-based method. The cost (NOK millions) is multiplied by the emission factor for the type of goods/service. Emission factors were obtained from the Norwegian Government Agency for Financial Management (DFØ)(government procurement related emissions) <a href="https://dfo.no/nokkeltall-og-statistikk/innkjop-i-offentlig-sektor/utslippsfaktorer-statlige-innkjop">https://dfo.no/nokkeltall-og-statistikk/innkjop-i-offentlig-sektor/utslippsfaktorer-statlige-innkjop</a>	The method will not capture any transition to more or less environmentally-friendly suppliers and does not take account of price increases.	The Bank will consider acquiring systems that can provide more fine-meshed information about individual purchases in order to move from secondary to primary data.



Category	Method	Weaknesses in the method	There are plans to move up in the data quality hierarchy
<b>Scope 3</b>			
Category 2: Capital goods	Spend-based method. The cost (NOK millions) is multiplied by the emission factor for the type of goods/service. Emission factors were obtained from the Norwegian Government Agency for Financial Management (DFØ)(government procurement related emissions) <a href="https://dfo.no/nokkeltall-og-statistikk/innkjop-i-offentlig-sektor/utslippsfaktorer-statlige-innkjop">https://dfo.no/nokkeltall-og-statistikk/innkjop-i-offentlig-sektor/utslippsfaktorer-statlige-innkjop</a>	The method will not capture any transition to more or less environmentally-friendly suppliers and does not take account of price increases.	The Bank will consider acquiring systems that can provide more fine-meshed information about individual purchases in order to move from secondary to primary data.
Category 3: Fuel and energy-related activities*	Activity-based method. The emissions associated with both the production and transmission loss of the energy sources are calculated based on the number of litres of fuel and the number of kWh recorded in scopes 1 and 2. All of the factors used for this estimate are taken from the website <a href="https://carbonsaver.org/tools/CO2e_factors.php">https://carbonsaver.org/tools/CO2e_factors.php</a> , which contains relevant emission factors from UK companies.	Given that the factors are based on UK emissions and industry, the emission figures for Norwegian industry could potentially be higher or lower.	Potentially investigate alternative data sources that may provide more national/Norwegian estimates/emissions figures
Category 4: Upstream transportation and distribution services	Spend-based method. The cost (NOK millions) is multiplied by the emission factor for the type of goods/service. Emission factors are obtained from the Norwegian Government Agency for Financial Management (DFØ) (emissions for state procurement) <a href="https://dfo.no/nokkeltall-og-statistikk/innkjop-i-offentlig-sektor/utslippsfaktorer-statlige-innkjop">https://dfo.no/nokkeltall-og-statistikk/innkjop-i-offentlig-sektor/utslippsfaktorer-statlige-innkjop</a>	The method will not capture any transition to more or less environmentally-friendly suppliers and does not take account of price increases.	The Bank will consider acquiring systems that can provide more fine-meshed information about individual purchases in order to move from secondary to primary data.
Category 5: Waste generated in operations	Calculations based on average data. Figures for the following departments/branches were obtained from: Retura SHMIL (the divisions in Brønnøysund and Sandnessjøen) and Retura HAF (the division in Mo). tCO <sub>2</sub> e figures are calculated using the amount of waste in kg multiplied by the specific emission factor per kg for the type of waste. The Bank is Eco-Lighthouse certified and sourced emission factors from them.	This method will not capture a supplier's transition to more or less environmentally-friendly technology.	Not possible to achieve better data quality at this time.
Category 6: Business travel	<p><u>Air</u>: Emissions figures were obtained directly from Berg-Hansen's Power BI report Business Insight.</p> <p>Rail: Number of train journeys multiplied by the relevant emission factor for average train journeys. The emission factor was sourced from the Eco-Lighthouse. The number of train journeys was obtained from Berg-Hansen's Business Insight.</p> <p><u>Mileage allowance</u>: The organisation collects primary data (number of km driven). This is multiplied by the emission factor obtained from Eco-Lighthouse. For 2024, new factors were collected that take account of the type of fuel to which the mileage allowance applies.</p> <p><u>Hotels</u>: New for 2024 is that figures were obtained for estimated emissions directly from Berg-Hansen based on the number of hotel nights (the figures were sourced from GreenView).*</p>	<p>*There is no data on the type of fuel related to the mileage allowance for the first 10 months of 2023. For the last two months of 2023, there is data on the proportion of electric vehicles and this has been used proportionally as estimates for the rest of the year.</p> <p>The factors for mileage allowances and train travel do not take account of business-specific technological changes, although from and including 2024 account will be taken of fuel-specific data related to mileage allowances.</p>	Changes were made to the system in order to obtain fuel-specific information from registered mileage allowance. The data quality will be higher from 2024 onwards. Furthermore, consideration should be given to taking account of the type of aircraft and the number of km flown to obtain more precise figures. As at 08.10.24, the Bank had obtained an update from Berg-Hansen in which the company had produced automated reports showing the company's overall travel patterns and costs. This new addition centres around an overview of the number of hotel nights, where reports will eventually be available for rail travel and rental cars. According to Berg-Hansen the hotel emissions were sourced from Greenview. Also new for 2024 is that direct figures/calculations were obtained from Berg-Hansen's Business Insight for estimates of the number of tonnes of CO <sub>2</sub> equivalents (tCO <sub>2</sub> e) for flights and the number of hotel nights.

Category	Method	Weaknesses in the method	There are plans to move up in the data quality hierarchy
<b>Scope 3</b>			
Category 7: Employee commuting	Data is collected on an annual basis from employees where they report how they commute, the type of fuel, the number of km commuted and the estimated number of days in the year they commuted to work. The emission factor is from the Handbook Emission Factors for Road Transport (HBEFA), <a href="http://www.hbefa.net">www.hbefa.net</a> , and takes into account the addition of biofuels to Norwegian petrol and diesel.	The method does not take into account vehicle-specific parameters such as engine size and model year.	None
Category 8: Upstream leased assets*	*	*	*
Category 9: Downstream transportation and distribution*	*	*	*
Category 10: Processing of sold products*	*	*	*
Category 11: Use of sold products*	*	*	*
Category 12: End-of-life treatment of sold products	Data on the number of cards issued by our supplier Evry is collected every year. The related emissions are calculated based on the number of cards and product specifications for the number of grammes and production materials per card using factors from DEFRA.	*	None
Category 13: Downstream leased assets	The proportion of electricity from the Bank's leased premises is reported in this category. Calculated using the same method used for scope 2.	The method does not take into account regional differences in emission factors. The NO4 electricity mix includes less imports of electricity generated using fossil sources. This is poorly reflected when national mix figures are used.	This results in the highest possible data quality, without auditing.
Category 14: Franchises*	*	*	*
Category 15: Investments (emissions in the loan portfolio)	Properties are calculated based on land registry information, energy labelling, construction years, etc. as supplied by Eiendomsverdi AS. Agriculture for active farmers is calculated based on the amount of cultivated land and the number of animals. These are sourced from the public grant register. Other industries are calculated using PCAF factors and are industry estimates.	Corporate market (CM): The emission factors are in most cases based on industry estimates and do not capture actual emissions per company. Retail market (RM): The same is true for the mortgage portfolio, although it should be noted here that many properties lack an energy label, which means that national averages had to be used. In many cases, this is inadequate and increases the uncertainty associated with the calculations.	Corporate market (CM): The Bank will eventually collect carbon reports from customers who produce them.

SpareBank 1 Helgeland conducted a screening process based on the 15 categories in scope 3. These categories are not reported on based on materiality:

- **Category 8:** Upstream leased assets: The Group largely owns its premises and equipment, and in the big picture the associated emissions are negligible.
- **Category 9:** Downstream transportation and distribution: The Bank does not produce physical goods so the category is not relevant.
- **Category 10:** Processing of sold products: The Bank does not produce physical goods so the category is not relevant.

- **Category 11:** Use of sold products: The Bank does not produce physical goods so the category is not relevant.

- **Category 14:** Franchises: The Bank has no franchises. Therefore, the category is not relevant.

#### Intensity:

The Bank reports intensity based on gross lending (Note 8). From 2023 to 2024, gross lending increased by NOK 2 196 million or 7.5%. CM saw an increase of NOK 487 million or 4.7% while RM saw an increase of NOK 1 708 million or 9%.

As at 31.12.2024, the Group's carbon report, targets and target achievement status were as follows:

	Retrospective			Milestones and target year (intensity cO2e/ gross lending)			
	Base year 2023	2024	% 2024/ 2023	2030	2040	2050	Annually % target/base year
<b>Scope 1 GHG emissions</b>							
Gross scope 1 GHG emissions (tCO2e)	10	9	-13%	-100%			-19%
Percentage of scope 1 GHG emissions from regulated emissions trading systems (%)	0%	0%					
<b>Scope 2 GHG emissions</b>							
Gross location-based scope 2 GHG emissions (tCO2e)	64	70	10%	-55%	-90%	-100%	2%
Gross market-based scope 2 GHG emissions (tCO2e)	727	713	-2%	-55%	-90%	-100%	-9%
<b>Scope 3 material GHG emissions</b>							
Total indirect gross scope 3 GHG emissions (tCO2e)	180 735	173 285	-4%	-15%		-100%	-11%
1: Purchased goods and services	532	525	-1%	-15%		-100%	-8%
2: Capital goods	265	175	-34%	-15%		-100%	-38%
3: Fuel- and energy-related activities not included in scope 1 or scope 2	98	94	-4%	-15%		-100%	-11%
4: Upstream transportation and distribution	25	11	-56%	-15%		-100%	-59%
5: Waste generated in operations	7	3	-61%	-15%		-100%	-64%
6: Business travel	121	50	-58%	-15%		-100%	-61%
7: Employee commuting	1 549	1 349	-13%	-15%		-100%	-19%
12: End-of-life treatment of sold products	1	2	276%	-15%		-100%	249%
13: Downstream leased assets	6	7	2%	-15%		-100%	-5%
15: Investments	178 132	171 069	-4%	-15%		-100%	-11%
<b>Total GHG emissions</b>							
<b>Total GHG emissions (location-based)(tCO2e)</b>	<b>180 810</b>	<b>173 364</b>	<b>-4%</b>	<b>-15%</b>		<b>-100%</b>	<b>-11%</b>
<b>Total GHG emissions (market-based)(tCO2e)</b>	<b>181 473</b>	<b>174 007</b>	<b>-4%</b>	<b>-15%</b>		<b>-100%</b>	<b>-11%</b>

### Change in emissions from base year

**Scope 1 emissions** saw a reduction of -13% from 2023. This was due to reduced petrol and diesel consumption for own vehicles in 2024.

**Scope 2 emissions** include energy consumption calculated using both location-based and market-based methods. Emissions in this category increased by 10% (location-based method). This was due to the increase in kWh consumption in 2024.

**Scope 3 emissions** include indirect emissions from goods and services other than energy. These emissions decreased by 11% compared with the base year. The Group's emissions are reported for the following categories:

- Purchased goods and services
- Capital goods
- Fuel- and energy-related activities not included in scope 1 or scope 2
- Upstream transportation and distribution
- Waste generated in operations
- Business travel
- Employee commuting
- End-of-life treatment of sold products
- Downstream leased assets
- Investments, including financed emissions in the Group's loan portfolio

#### Category 1: Purchased goods and services

There was a slight decrease of -1% in the purchased goods and services category.

#### Category 2: Capital goods

This category saw a 34% reduction. In 2021, the Bank started to refurbish its head office in Mo i Rana. The main piece of the refurbishment was scheduled to take 2 years, and in 2023 the employees were once again able to gather under a single roof after being based at temporary locations during the refurbishment period. The head office is owned by the Bank's subsidiary Bankbygg Mo AS. In practice, the refurbishment accounts for almost all emissions in this category in both 2023 and 2024. In 2023 and 2024, NOK 45 million and NOK 32 million, respectively, were activated in relation to this refurbishment, and it accounted for 85% of emissions in 2023 and 92% of emissions in 2024.

#### Category 3: Fuel- and energy-related activities not included in scope 1 or scope 2

This category includes the emissions related to the production of the energy consumed in scopes 1 and 2. This category saw a 4% reduction from 2023 to 2024.

#### Category 4: Upstream transport and distribution.

The category includes postage and the purchase of other transport services. This category saw a 56% reduction in 2024. This was due to the focus on digital communication with customers instead of sending letters.

#### Category 5: Waste management

This category saw a reduction of no less than 61%. This was due to the aforementioned renovation of the head office in which most of the demolition work took place in 2022 and 2023.

#### Category 6: Business travel

This category saw a 58% reduction in 2024. In early 2024, the Bank introduced a new travel policy that focuses on sustainability and reducing emissions. This has resulted in a 19.5% reduction in the number of flights and a 70% reduction in the number of km driven where employees received a mileage allowance. In addition to the 70% reduction in the number of km, the proportion of electric vehicles increased. This also makes a positive contribution.

#### Category 7: Employee commuting.

Emissions from commuting decreased by 13% in 2024. The number of employees in the Bank was on a par with the year before, while the proportion of employees driving electric vehicles increased from 36% to 42% in 2024. The proportion of employees walking or cycling to work increased from 14% to 15%.

#### Category 12: End-of-life treatment of sold products

The category includes the number of bank cards issued. The increase seen here was no less than 249%. This is related to the business transfer and joining the Alliance in 2021. All of our customers received new bank cards in connection with this. These expire after 3 years, so most customers were sent new bank cards in 2024. The level of emissions in this category is expected to normalise in 2025.

#### Category 15: Investments.

The Group's volume of lending to the corporate market increased by 4.7% while emissions were reduced by 3.1%. In terms of intensity, this means that we have seen a 7.7% reduction in CM emissions. This indicates that the growth in lending came in less emission-intensive industries, while we saw reductions or repayments in loans in emission-intensive industries.

Otherwise, better data quality in this category is needed in order to determine our progress in relation to targets and whether actions are having an effect.

**The emissions and energy consumption in properties in which SpareBank 1 Helgeland has collateral:**

31.12.24

	Average construction year	Average usable floor area (UFA)	Quantity properties
Commercial properties	1979	612	12.47
Residential properties	1977	136	13 935



		Location-based method, scopes 1-2		Market-based, scope, 1-2		Location-based, scope 3
Location-based versus market-based emissions	Loan, NOK millions	Estimated financed emissions (tCO2e)	Carbon intensity (tCO2e per NOK million in lending)	Estimated financed emissions (tCO2e)	Carbon intensity (tCO2e per NOK million in lending)	Estimated Financed emissions (tCO2e)
Commercial properties	4 493	1 709	0.4	67 916	15.1	1 206
Residential properties	20 324	3 408	0.2	119 850	5.9	

	Estimated total electricity consumption for all properties (MWh/year)	Average electricity consumption (kWh/m2/year)	Average electricity consumption per property (MWh/m2/year)	Average location-based emissions (kgCO2e/m2)
Commercial properties	4 493	1 709	0.4	67 916
Residential properties	20 324	3 408	0.2	119 850

## Emissions by sector and industry in the loan portfolio (scope 3, category 15)

2024	Scopes 1 and 2					Scope 3
	Lending Total (NOK millions)	Scopes 1-2 financed emissions (tCO2e)	% of financed emissions	Weighted data quality	Emission intensity (tCO2e)/gross lending	Scope 3 financed emissions (tCO2e)
Agriculture	827	72 468	42.4%	3.0	87.6	103 128
Fisheries and aquaculture	1 454	63 796	37.3%	4.1	43.9	28 970
Mining and quarrying	27	1 723	1.0%	4.0	63.8	807
Manufacturing	474	8 788	5.1%	4.0	18.5	23 658
Electricity, gas and steam	231	-	0.0%	4.0	-	-
Water supply, sewerage, waste	11	898	0.5%	4.2	81.7	156
Construction	852	2 137	1.2%	4.3	2.5	25 084
Wholesale and retail trade	326	1 650	1.0%	4.1	5.1	8 994
Transportation and storage	549	13 287	7.8%	4.1	24.2	7 431
Accommodation and food service activities	369	430	0.3%	4.1	1.2	2 341
Information and communication	7	28	0.0%	4.4	4.1	75
Financial and insurance activities	644	56	0.0%	4.4	0.1	318
Sale and management of real estate	3 967	810	0.5%	4.0	0.2	166
Professional, scientific and technical services	645	160	0.1%	4.6	0.2	876
Business services	78	408	0.2%	4.3	5.2	587
Public administration and defence, including publicly administered social security schemes	36	55	0.0%	5.0	1.5	116
Private education	18	91	0.1%	4.8	5.0	191
Private health and social services	110	429	0.3%	4.5	3.9	904
Leisure, culture and sports	101	292	0.2%	4.5	2.9	614
Other services industry	47	136	0.1%	4.8	2.9	286
Home-based services	10	19	0.0%	5.0	1.9	40
Total industry	10 783	167 661	98.0%	4.0	15.5	204 744
Retail market	20 634	3 408	2.0%	3.1	0.2	
Total corporate market and retail market	31 417	171 069	100.0%	3.4	5.4	204 744

## Data quality

### Properties (residential and commercial properties)

There are challenges related to the lack of energy labels for residential and commercial properties, and poor compliance with energy certification requirements among property developers. A lack of energy labels affects the Bank's ability to provide green financing, classify loans for properties under the green finance framework, classify homes that are green under Article 8 of the Taxonomy Regulation, estimate the correct risk in the collateral portfolio and influence borrowers and homeowners to choose green options.

From 2023 to 2024, the proportion of properties with energy labels rose from 31% to 36% for residential properties and from 6% to 9% for commercial properties.

ENERGY LABEL 2024	Proportion of residential properties	Proportion of commercial properties
AS	1%	0%
B	3%	1%
C	3%	1%
D	4%	2%
Eiendomsselskap	5%	1%
F	7%	2%
G	9%	2%
Expired energy label	4%	0%
Missing, but built after 2012	5%	12%
Missing energy label, other	59%	80%
Total	100%	100%
	2024	2023
Energy label, homes	36%	31%
Energy label, commercial properties	9%	6%

Data quality of the different items  
The carbon report looks like this:

	Data quality	
	2023	2024
Scope 1 GHG emissions		
Gross scope 1 GHG emissions	2	2
Scope 2 GHG emissions		
Gross location-based Scope 2 GHG emissions	2	2
Gross market-based Scope 2 GHG emissions	2	2
Scope 3 material GHG emissions		
1: Purchased goods and services	5	5
2: Capital goods	5	5
3: Fuel- and energy-related activities not included in scope and scope 2	3	3
4: Upstream transportation and distribution	5	5
5: Waste generated in operations	3	3
6: Business travel	3	3
7: Employee commuting	2	2
12: End-of-life treatment of sold products	3	3
15: Investments	3.44	3.43

SpareBank 1 Helgeland reports on data quality in line with this model from the guidelines issued by Finance Norway:

Data quality	Calculation method	Alternative	variable
1	Emissions reported by the company	1a	Verified reported emissions
		1b	Reported, unverified emissions
2	Calculated physical activity-based emissions	2a	Calculated emissions based on energy consumption and associated emission factors
3		2b	Calculated emissions based on production data and associated emission factors
4	Calculated economic activity-based emissions	3a	Calculated emissions based on company revenue and sector-specific emission factors per revenue
5		3b	Calculated emissions based on company on-balance sheet values and sector-specific emission factors per unit of value

From 2023 to 2024, data quality in the loan portfolio improved from 3.43 to 3.44. In other categories, data quality was unchanged year-on-year.

### Data quality for properties:

Energy labels for residential and commercial properties tell us something about the energy efficiency of the buildings. Where buildings lack an energy label but were built after 2012, we assume that the buildings were built in compliance with TEK10 or TEK17, and that they are energy efficient buildings. Emissions can be estimated for the proportion of buildings that lack an energy label based on the construction year, type of building, number of square metres, etc.

The carbon report shows that we are well on our way to achieving the targets we have set ourselves in relation to net zero emissions in 2050. However, a lot of uncertainty is associated with the estimates in emissions calculations, and obtaining more precise data is absolutely crucial if we are to determine the effects of actions and our progress in relation to the targets we have set ourselves.

### Taxonomy

The EU Taxonomy is the cornerstone of the EU's climate policy via the Green Deal. The Disclosure Regulation and the EU Taxonomy Regulation entered into force on 01.01.23 and set requirements for what can be considered sustainable investments and economic activities. Our corporate customers will report on the Taxonomy this year for the first time. However, since they present their annual reports around the same time we do, we are unable to report the proportion of green activities at these customers before the next annual report.

Annex V Section 1.1.1 of the Disclosure Delegated Act stipulates that banks must apply the consolidation principles in the Capital Requirements Regulation (CRR) when calculating KPIs for reporting under article 8 of the Taxonomy.

### The Taxonomy in brief

The EU Taxonomy is a classification system that defines which economic activities are sustainable in light of the EU's stipulated environmental objectives. The intention is to increase transparency in the market and help move capital in a more sustainable direction, and represents an important step towards the goal of carbon neutrality by 2050.

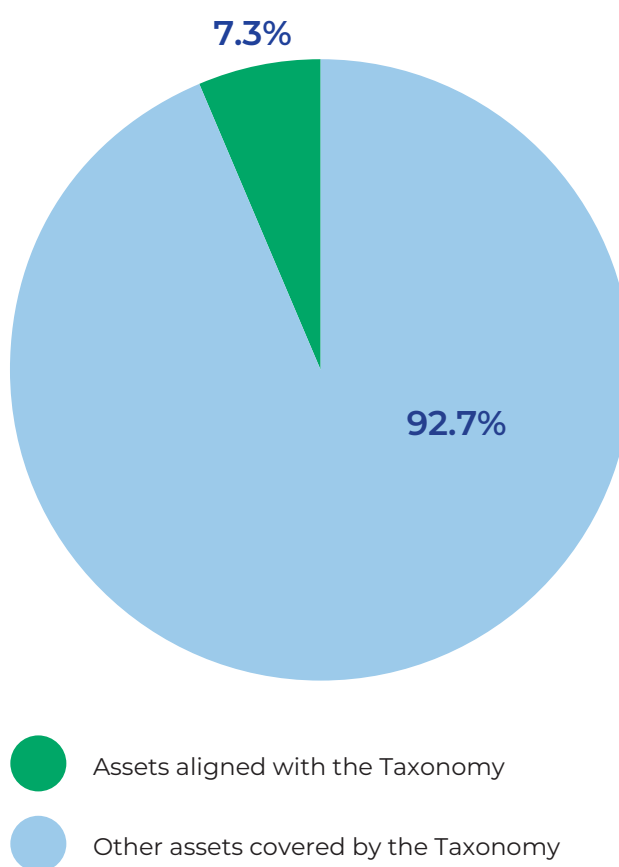
### Disclosure requirements

We must disclose how much of the financial actors' activities are Taxonomy-aligned. In the financial industry, Taxonomy-related information is expected to be presented as a green asset ratio (GAR). The implementation of the Taxonomy has followed a gradual step-by-step process with six environmental objectives, and all six environmental objectives must be reported on for 2024.

### Proportion of portfolio that is Taxonomy-eligible and Taxonomy-aligned as at 31.12.24 (31.12.23)

Of the assets exposed to economic activities covered by the Taxonomy, NOK 2 687 million (NOK 2 292 million) or 7.3% (6.5%) of total assets are included in the GAR and are aligned with, and can be classified as sustainable in relation to, the Taxonomy. Of the new mortgages granted in 2024 totalling NOK 3 266 million, NOK 539 million or 16.5% were Taxonomy-aligned.

### GAR (ASSETS ALIGNED WITH THE TAXONOMY)



### Method for calculating what is aligned with the Taxonomy

The Taxonomy distinguishes between houses built before 2021 and from 2021 and onwards.

### For homes with construction years up to and including 2020

For homes with construction years up to and including 2020 to be aligned with the Taxonomy, the home must be in the top 15% in Norway. The Norwegian Water Resources and Energy Directorate (NVE) has mapped emissions from buildings in Norway and in a letter to the ministry

described the 15% threshold. This has been passed on to the banks by Finance Norway. In its survey, the NVE concluded that flats with a kWh per gross floor area of less than 120 and houses/holiday homes with a residences with kWh per gross floor area of less than 150 are in the top 15%.

In practice: Homes with construction years between 2012 and 2020 are assumed to have been built in compliance with TEK10 or TEK17 and be energy efficient buildings and are considered Taxonomy-aligned. Older homes with an energy label are in the top 15% and Taxonomy-aligned if the home's label is A or B.

### For homes built in 2021 and later

For homes built in 2021 and later, the home must be a nearly zero energy building (NZEB-10%). SpareBank 1 Helgeland has used Multiconsult's methodology described in their "Impact Assessment Report" for SpareBank 1 SR-Bank's green bond programme.

There is a methodical difference between NZEB and the energy labelling scheme. NZEB only covers the heating of a building, while the energy label scheme includes technical equipment. Defined fixed components represent the electricity consumed by technical equipment. Homes, flats/blocks of flats have a fixed component of 28.9 kWh per gross floor area.

Because we have received kWh per gross floor area figures from Eiendomsverdi AS, we can compare the NZEB-10% and energy label figures and determine whether each individual house/flat is aligned with the Taxonomy or not. See the example below:

	Gross floor area	Energy label	Energy label's kWh per gross floor area	NZEB	NZEB -10	NZEB-10% + fixed component	OK according to NZEB-10%?
House A	100	A	95	92.0	82.8	111.7	YES
House B	100	B	108	92.0	82.8	111.7	YES
House C	150	A	106	86.7	78.0	106.9	YES
House D	200	B	108	84.0	75.6	104.5	NO
Flat A	50	A	88	67.0	60.3	89.2	YES
Flat B	50	A	95	67.0	60.3	89.2	NO
Flat C	100	A	90	67.0	60.3	89.2	NO
Flat D	150	A	88	67.0	60.3	89.2	YES

### Covered bonds in the liquidity portfolio

In order for covered bonds to be Taxonomy-aligned, we must be able to document that they are through Taxonomy reporting from the individual covered bond issuers, and we do not have the data for this yet. Therefore, we cannot report whether or not this was more aligned with the Taxonomy in 2024.

## ANTICIPATED FINANCIAL EFFECTS FROM MATERIAL PHYSICAL AND TRANSITION RISKS AND POTENTIAL CLIMATE-RELATED OPPORTUNITIES

At this time, SpareBank 1 Helgeland has not quantified the provisions for expected losses related to climate risk in its loan portfolio or own activities, although we have identified mortgaged objects with physical climate risk in the portfolio. For a more detailed description and the proportion of the loan portfolio with physical climate risk, see "Climate change", "Material impacts, risks and opportunities and their interaction with strategy and business model".

As far as transition risk is concerned, we have qualitatively identified the transition risk in some industries and we know something about how large a proportion of properties is not Taxonomy-aligned and that will have to transition in the period up to 2050. For further information on the proportion of assets not Taxonomy-aligned, see "Climate change", "Gross scopes 1, 2, 3 and total GHG emissions".

In the case of potential climate-related opportunities, we have identified financing the green transition as an opportunity, although we have not quantified the financial impact of this at this time.

# ESRS S1 Own workforce

## STRATEGY

### INTERESTS AND VIEWS OF STAKEHOLDERS

See the description in ESRS2 General Disclosures, Interests and views of stakeholders

### MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

SpareBank 1 Helgeland is one of the region's large knowledge-intensive workplaces. With a total of 172 permanent employees, spread across four branches, the Bank interacts with hundreds of customers every day. Irrespective of whether that interaction is face-to-face, over the phone or online, the goal is to provide value for our customers because, as a locally owned and locally managed bank, we understand and are close to the everyday lives of our customers. Being the local bank is our biggest competitive advantage. To maintain this, we are entirely dependent on all our employees. This topic, essentially, covers the Bank's permanent employees. The Bank has no employees on zero-hour contracts.



The sustainability strategy includes ambitious goals for the work on financed emissions and contributions to clubs, associations and partners. If the Bank is to achieve these targets, employee ownership and competence will be by far the most important factors for success. Without the right skills, it will not be possible to provide customers with good advice. Customers, suppliers and authorities are continually stipulating new requirements and expectations, and SpareBank 1 Helgeland's most important investment in the years to come will be in the competence of its employees.

The materiality assessment clearly showed that inadequate ESG capacity and competence poses a potential financial risk to the Bank through our customers, and that competent employees constitute an opportunity to have a positive impact.

Working conditions (e.g. secure employment, working hours, pay, freedom of association and participation, work-life balance and working environment) and equal treatment and opportunities for all have a major impact on employees' life and health, and can have both positive and negative impacts on the Group's performance. Negative impacts can result in sickness absence and high turnover and challenges as regards recruitment and the ability to acquire new skills.

Several of the stakeholders involved in the double materiality assessment also point out the Bank's expertise as a positive impact that the Bank can in relation to customers and businesses. This contributed to it becoming a material topic. For more information, see the chapter on the materiality assessment.

## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

### POLICIES RELATED TO OWN WORKFORCE

Within HR, training and skills development there are five levels of governance documents, from strategic objectives to work descriptions. These documents are available to all employees on the Bank's intranet.

#### Code of conduct

The Bank's code of conduct is a governance document on a par with the Bank's strategy and applies to employees, elected representatives, customers and suppliers.

SpareBank 1 Helgeland is the local bank for Helgeland. Our vision is to be a driving force for growth in Helgeland. To succeed, we are dependent on having a good reputation and the confidence of customers, the public authorities and society.

Trust is created in the interactions with customers, suppliers and partners. Our employees must be

recognised as having high ethical standards. We must be honest, trustworthy and have integrity. Employees must conduct themselves in accordance with applicable laws, regulations, industry standards, internal policies and the norms that apply in society. The code of conduct is a cornerstone of our business operations and strategic goals.

The code of conduct is reviewed and approved by the Bank's Board of Directors every year, most recently in October 2024, and is available to the Bank's employees and the public via the Bank's Insights webpage.

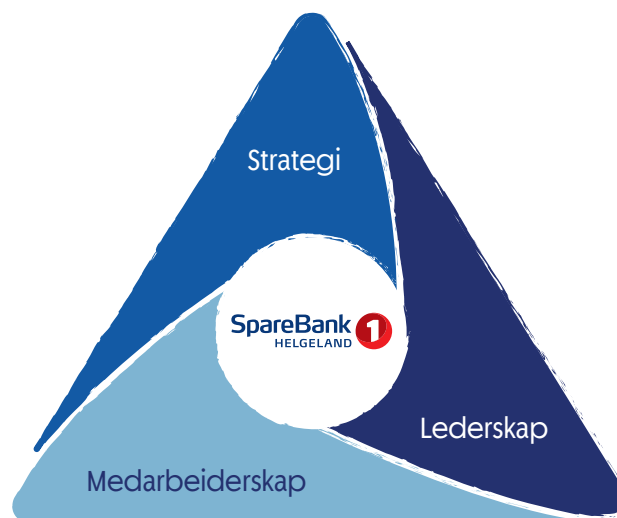
#### HR policy

The most relevant governance document in the area of HR is the Bank's HR Policy. This document is evaluated and approved by the Bank's Board of Directors, most recently in October 2024, and the current document applies for the period 2025-2028. The HR policy is available to employees on the Bank's Insights webpage.

The HR policy is designed to operationalise actions within the organisational and HR parts of:

- The Bank's strategic platform
- The Bank's sustainability strategy
- The Bank's management of the operational risks associated with the organisation and employees (described in the operational risk policy, which is subject to the Bank's risk and capital strategy).
- And to ensure compliance with the Bank's code of conduct

To steer the organisation in the desired direction, employees took part in the work on strategy, descriptions and leadership and employeeship follow-up. Documents have been established that, for example, describe how managers and employees are expected to conduct themselves. This is a corporate culture project that will also be prioritised during the term of the approved HR policy.



Our HR policy provides guidelines for HR's work in the organisation and describes roles and responsibilities in relation to implementing the policy contents. Priority areas of work are described.

### Standard for identifying and preventing conflicts of interest

The Bank has active and committed employees, therefore, having a governance document that specifies how to avoid, identify and manage potential conflicts of interest is important. The standard for conflicts of interest is approved by the Bank's Board of Directors, most recently in October 2024. The standard for identifying and preventing conflicts of interest is available to the Bank's employees on its Insights webpage.

The purpose of the standard is to specify how SpareBank 1 Helgeland should identify conflicts of interest in the various business areas and how any conflicts of interest should be prevented and managed. Situations that can result in conflicts of interest and the actions that can be taken to prevent them are described below.

There is also a policy that describes how conflicts of interest should be managed in more detail. This has been approved by the CEO.

### Processes for working on diversity and equality

SpareBank 1 Helgeland's procedure for diversity and equality is a governance document that has been embedded in other approved documents.

As an organisation and workplace, the Bank must be an attractive and challenging place to work. We are convinced that diversity, equality and inclusion are key areas of work where we must deliver every day in order to achieve this. This is a never-ending job that will be both demanding and rewarding. Both current and future employees should see that the goals are being realised.

The aim of working for an equal and diverse working life is to comply with, and deliver on, what has been approved in:

- Statutory and regulatory requirements
- Overarching and strategic governance documents
- Sustainability strategy
- HR policy
- Management and employee platform

As a minimum, the work must cover the following areas:

- Recruitment
- Pay and working conditions

- Promotion and development opportunities
- Adaptation
- Ability to combine work and family life

Specific actions are approved by the Bank's Group Committee, which includes elected representatives.

### PROCESSES FOR ENGAGING WITH OWN WORKERS AND WORKERS' REPRESENTATIVES ABOUT IMPACTS

Like other banks in Norway, SpareBank 1 Helgeland is based on structures and agreements that provide a good basis for participation. The right of employees to participate, and the opportunities to do so, are a guiding principle in the Nordic approach to work.

### Collective agreements and union organisation

SpareBank 1 Helgeland is affiliated to the collective agreements in the financial sector, which have been negotiated between Finance Norway (Confederation of Norwegian Enterprise) and the Finance Sector Union of Norway. A corporate agreement has been negotiated locally with the Bank, which covers all employees, both unionised and non-unionised. The corporate agreement is available to all employees on the Bank's intranet.

88% of the Bank's employees are members of the Finance Sector Union of Norway. The Bank also has employees who are members of other unions. The Bank only has an overview of the proportion of membership of the Finance Sector Union.

### Forums for participation

Collective wage agreements require forums for participation. In the Bank, these are organised as follows:

- The Group Committee – meets four times a year. All elected representatives, including the chief employee representative, and parts of the Management Group, including the CEO, participate in the committee. The collective wage agreement describes the matters handled by the committee. Meeting minutes are available to employees on the Bank's intranet.
- The Appointments Committee – meets when the Bank hires new employees. The chief employee representative, the managers involved in conducting interviews and other processes, the head of HR and the CEO participate in the committee.

### HSE work

The Working Environment Act stipulates requirements for participation at work that apply to the employee's working environment. This is

addressed in a number of ways. The Bank has agreements with an approved occupational health service.

- The Working Environment Committee meets four times a year. Representatives of the safety service, elected representatives, the Management Group and the occupational health service participate in the committee. The meetings have a fixed agenda and meeting minutes are available to employees on the Bank's intranet.
- The HSE plan consists of goals and measures for the Bank's overall HSE work. It is approved by the Working Environment Committee and is a fixed item on the agenda. Measures are considered at each meeting. The HSE plan is valid for a year at a time and is available to all employees on the Bank's intranet.

What employees feel about the overall working environment is surveyed every 2 weeks. These surveys consist of six questions selected by AI from nine subject categories in the Winningtemp (WT) system. These categories are: leadership, job satisfaction, meaningfulness, autonomy, work situation, participation, personal development, sense of team and effort. We also now include questions from the areas of psychological safety and cross-functional cooperation. Employees' responses are anonymous, and updated results concerning employee experiences are available to employees and managers at all times.

In WT, employees can also report experiences involving bullying and harassment anonymously.

Winningtemp (WT) is a system for measuring employee satisfaction in organisations. Satisfaction is measured in terms of nine subject categories based on different questions that are sent out regularly. The survey is anonymous, and employees have access to scores in their own unit. For managers, WT is an important management tool in their work on the working environment of the unit. WT is used by the entire SpareBank 1 Alliance. WT scores are on a scale of 1-10, where scores from 7-10 represent a green level.

### PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR OWN WORKERS TO RAISE CONCERNS

SpareBank 1 Helgeland has a procedure that describes the purpose of whistle-blowing and defines potential unacceptable conditions, defines responsibilities and explains the whistle-blowing routines. The procedure was adopted by the CEO, was last updated in 2023 and is available to employees on the banks intranet.

The Bank has a digital whistle-blowing mechanism operated by Ernst & Young.

This service is a secure digital whistle-blowing

solution and is operated by the investigation unit in the consulting and audit firm Ernst & Young AS (EY). It enables people to report misconduct in accordance with the Working Environment Act. Reports of misconduct under the Working Environment Act are sent directly to EY. The whistle-blower chooses whether they want to report anonymously.

As far as reports of misconduct are concerned, it is possible to remain anonymous to SpareBank 1 Helgeland even if the whistleblower's contact information is known to EY's report recipient. If they choose to disclose their identity to just EY, the EY's investigation unit may contact them to follow up their report if there is a need to further clarify the report.

SpareBank 1 Helgeland wants to ensure it has a corporate culture in which there is freedom of expression. A good climate for freedom of expression is important for the working environment, well-being of individuals and in ensuring that the business is run in the best possible way. It is important that illegal and unacceptable situations and other nonconformances are identified and followed up as early as possible. SpareBank 1 Helgeland focuses on ensuring that employees feel confident that addressing unacceptable conditions is a natural part of an individual's responsibilities in the workplace and where such situations are resolved at the lowest possible level.

Employees also have a statutory right under the Working Environment Act to report misconduct in the workplace. In this context, the definition of employee includes contracted employees and people working in the organisation for the purpose of training or in connection with work-oriented measures. The same applies to people participating in labour market measures.

In some cases, employees also have a statutory duty to report. If employees become aware of cases of workplace harassment or discrimination or become aware of errors or deficiencies that could endanger life or health, they must report them.

If there is reason to believe that an unacceptable situation exists in the company, employees are encouraged to report it such that SpareBank 1 Helgeland is informed of the matter and the necessary action can be taken.

The purpose of the whistle-blowing procedures and systems is to facilitate safe and proper reporting.

### Reporting via Winningtemp

Together with the other banks in the SpareBank 1 Alliance, SpareBank 1 Helgeland uses the Winningtemp (WT) system to measure employee satisfaction. In the case of questions that deal with perceived bullying and harassment, employees can report anonymously in the system via a chat solution.

The report is then passed to the immediate line manager and/or HR. It can be handled anonymously in the system, or the employee can choose to waive their anonymity and it will then be handled openly.

### **TAKING ACTION ON MATERIAL IMPACTS ON OWN WORKFORCE, AND APPROACHES TO MITIGATING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO OWN WORKFORCE, AND EFFECTIVENESS OF THOSE ACTIONS**

The organisation takes account of trends within various professional areas and in society in general. The Bank's approved strategic platform with its prioritised areas of work steers the direction of our inner life as well. As an organisation, we must live our brand. This means that what happens inside the Bank must match what those outside it require of us.

HR cannot implement every action designed to steer the organisation in the right direction, although some prioritised areas of action are described in the HR policy. Areas and actions are assessed and adjusted in every annual evaluation.

In 2024, we faced challenges and opportunities within the organisation in the following areas and initiatives:

#### **Building a common corporate identity and culture**

- Employee workshops were conducted at both departmental and divisional levels, with both professional and social content. Common topics included compliance with employeeship and fulfilling employee promises. These are the cornerstones of the Bank's organisational corporate culture work. Results from the working environment surveys conducted by Winningtemp (WT) were important in understanding whether our corporate culture work is on the right track.
- The Bank's employees are divided into 15 teams based on geography and department structure. Each of the teams have a team leader. These compete in different physical activities and win social prizes at a team level. For the second year running, the Bank purchased the activity solution SPOR through the supplier Avantas. The Bank's employees face high levels of activity and are strong self-starters.
- The Bank's customer events are also arenas for building corporate culture and identity. Several customer events to which employees contributed were organised in 2024 in all four cities and several smaller towns in Helgeland. Employees are also free to attend customer events across branches.
- At our four branches, branch meetings were held throughout 2024 at which employees

from the Bank, accounting firm and real estate agency participated. The idea was to get to know each other better. HR attends these branch meetings to share some of what is happening in this field.

- Every January/February, the Bank's Working Environment Committee and safety representatives arrange a Health Week in which employees at the Bank, accounting firm and real estate agency are invited to participate in various physical and social activities. Topical workshops that include sustainable food and beverages are also offered.
- There was no all-hands meeting for the Bank's employees in 2024. One is being planned for Sandnessjøen in spring 2025.

#### **Amplifying proactive and coordinated leadership**

- There were several gatherings for the Bank's managers with personnel responsibilities throughout 2024. They gather regularly at discipline, departmental and divisional levels. There were also gatherings at an overarching level designed to continue the work on the Manager Platform and implement it in their daily operations. The Manager Platform is available to all employees on the Bank's Insights webpage.
- In autumn 2022, the Bank adopted Winningtemp (WT), a system for checking the Bank's pulse as regards employee satisfaction via nine subject categories. WT is also a management tool for following up your own department and employees by taking steps to improve or maintain factors in the working environment. In 2024, managers worked systematically to apply results from WT in departmental meetings.
- The Employee Platform mirrors the Manager Platform. The contents of the Employee Platform are produced through a joint process involving all employees and also apply to managers. There were several gatherings and meetings that focused on the job of implementing employee promises. Employee appraisal templates were revised to ensure that employee promises are also discussed, complied with and evaluated at an individual level. It is the managers who are responsible for conducting employee, status and salary appraisals with their employees.

#### **Recruiting the right candidates**

- Recruitment and improvement work are continuous processes, from assessing the skills required, choosing the channels or adverts, interview and conversation techniques to the onboarding process. The HR director participates in local HR and recruitment networks to forge closer links with the labour market in Helgeland.



## Skills of the future

- HR will, together with the Bank's management and specialist coordinators, ensure that the skills of the Bank's employees are developed in a forward-leaning and systematic manner. Every year there are employees who take study programmes at university colleges and university, as well as professional courses. In 2024, the Bank spent nearly NOK 1 million on improving skills.
- Membership of the SpareBank 1 Alliance provides us with access to both obligatory training and authorisations, as well as updating courses. Much of this is organised through the Utsikt skills portal. This area is reported on later in the sustainability report.

## METRICS AND TARGETS

### TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

The Bank has adopted four long-term, strategic goals, which the employees must work on to achieve the Bank's overarching vision. The Bank's employees work on these every day regardless of which division they work in. To achieve this, the Bank has adopted a long-term goal for the organisation. The goal is to *"Be an attractive and challenging workplace"*.

Four strategic goals have been adopted in the organisational area in order to learn whether the Bank's work on its long-term goals is on the right track. These are:

- Employee's commitment at a green level, i.e. score > 7 on a scale of 1-10. Measured by Winningtemp system. Result for 2024 7.7.
- Experienced leadership at a green level, i.e. score > 7 on a scale of 1-10. Measured by Winningtemp system. Result for 2024 8.1.
- Labour presence should be > 97% annually. Result for 2024 92.8%.

In 2024, new guidelines for an equal and diverse work life were developed and approved, see above. The process of developing objectives and action plans is currently ongoing, which means that no specific surveys have been conducted regarding these objectives. This is part of the reporting duty, where the Bank is aiming to comply with the reporting duty in 2025.

### CHARACTERISTICS OF THE UNDERTAKING'S EMPLOYEES

The overarching objective of the recruitment work is to appoint the most competent candidates. In 2024, personnel were recruited through both external (eight) and internal (three) job adverts.

SpareBank 1 Helgeland's employees are spread across the Bank's four branches: Brønnøysund, Sandnessjøen, Mosjøen and Mo i Rana (head office). We are organised as one region and one entity, with a single organisation number. All employees are resident in Norway.

The number of people and gender balance in the Bank can be categorised in the following ways.

Total number of employees:

Gender	31.12.24	31.12.23
Women	107	112
Men	79	76
Other (not relevant)		
Not reported	0	0
Total number of employees	186	188

In Norway, people cannot register as belonging to a third neutral gender. Therefore, the "other" category does not apply.

The number of people and gender balance in the Bank were categorised as follows as at 31.12.24.

31.12.24

	Women	Men	No information	Total number
Number of employees	107	79	0	186
Number of permanent employees	101	71	0	172
Number of temporary employees	6	8	0	14
Number of non-guaranteed hours employees	0	0	0	0
Number of full-time employees	103	78	0	167
Number of part-time employees	4	1	0	5

31.12.23

	Women	Men	No information	Total number
Number of employees	112	76	0	188
Number of permanent employees	99	67	0	166
Number of temporary employees	13	9	0	22
Number of non-guaranteed hours employees	0	0	0	0
Number of full-time employees	96	67	0	163
Number of part-time employees	3	0	0	3

The number of temporary employees is not included in the number of full-time employees and the number of part-time employees.

### Part-time and temporary employees

We have three permanent employees (women) who work part-time. Everyone who works part-time does so voluntarily.

The Bank had 23 temporary holiday staff in 2024. These are students who are currently studying for a bachelor's or master's degree.

Several of the temporary summer staff also work for the Bank during the Easter and Christmas holidays. Having students as temporary summer staff leads to opportunities for permanent employment at a later date.

The Bank contracted four former employees (retirees) to carry out work in connection with two projects.

### Recruitment

The Bank recruited new employees to three of the Bank's offices throughout 2024. Vacant positions were advertised both internally and externally. In total, 11 people were recruited, of which six were women and five were men.

10 people joined the bank in 2024, of these four were women and six were men. Of the other types of termination, four of these employees retired. The final four were temporary employees (longer than 6 months). Total employee turnover in 2024 was 5%. 10% is often deemed normal or acceptable employee turnover.

Reporting period	31.12.24	31.12.23
Number of voluntary terminations during the period	0	5
Number of terminations during the period	0	0
Number of retirements during the period	1	5
Number of deaths during the period	1	0
Other types of terminations during the period	8	0
Total terminations during the period	10	11

### CHARACTERISTICS OF NON-EMPLOYEE WORKERS IN THE UNDERTAKING'S OWN WORKFORCE

The Bank did not hire labour from self-employed people or from companies that primarily offer labour services in 2024.

### COLLECTIVE BARGAINING COVERAGE AND SOCIAL DIALOGUE

100% of all employees in SpareBank 1 Helgeland are covered by collective agreements.

The Bank is affiliated to the collective agreements in the financial sector, which have been negotiated between Finance Norway (Confederation of Norwegian Enterprise) and the Finance Sector Union of Norway. A corporate agreement has been negotiated locally with the Bank, which covers all employees, both unionised and non-unionised. The corporate agreement is available to all employees on the company's intranet.

100% of all employees in SpareBank 1 Helgeland have an employee representative.

	Collective bargaining coverage	and social dialogue
Coverage	Employees (EEA)	Workplace representation
0-19%		
20-39%		
40-59%		
60-79%		
80-100%	Norway	Norway

### DIVERSITY METRICS

#### Management and governance bodies

The Bank is aiming to achieve an equal distribution of women and men in executive positions. This goal has been achieved in the Bank's Board of Directors and Management Group. The management level below this, including team leaders, has eight women and 16 men. In 2024, a new female team leader was recruited and two new male managers started work in newly created management positions.

The Bank's management and governance bodies had the following number of personnel and gender distribution as at 31.12.24:

31.12.24

	Women	Men	No information	Total number
Supervisory Board	8	17	0	25
The Board of Directors	4	4	0	8
The Bank's Management Group	3	3	0	6
Middle managers with personnel responsibilities	8	16	0	24

31.12.24

	Women	Men	No information	Total number
Supervisory Board	9	16	0	25
The Board of Directors	4	4	0	8
The Bank's Management Group	3	3	0	6
Middle managers with personnel responsibilities	7	14	0	21

The ages of the Bank's employees are distributed as follows:

Number of employees	31.12.24	31.12.23
< 30 years old	10	14
30-50 years old	92	85
> 50 years old	70	67
<b>Total employees</b>	<b>172</b>	<b>166</b>

### ADEQUATE WAGES

All employees of SpareBank 1 Helgeland receive adequate wages in line with applicable reference wages. The central agreement between the Finance Sector Union of Norway and Finance Norway contains specific provisions governing wages for employees covered by the agreement. According to section 7, item 1, an employee must be paid in line with the rates in the table of wages from initial employment in the company, and the initial salary must not be lower than pay grade level 22.

### SOCIAL PROTECTION

All employees of SpareBank 1 Helgeland are, in line with Norwegian law, covered by social protections against loss of income due to illness, unemployment, occupational injury and acquired disability, parental leave and pensions.

### METRICS FOR TRAINING AND SKILLS DEVELOPMENT

All of SpareBank 1 Helgeland's employees have equal access to training and skills development, regardless of gender.

31.12.23

	Women	Men
Proportion of employees who have received offers of training and skills development	100%	100%
Average number of training hours	16.8	15.0
Proportion of employees who have received regular performance and career development review appraisals	100%	100%

Only training on internal platforms is included when calculating the average number of training hours. Employees receive various types of training and skills development on external platforms, such that the number of hours is in reality higher.

### Training and skills development in 2024

- **Advisors in the retail market** must complete the highest number of mandatory courses and authorisations in order to perform their role independently. Each new retail market advisor spent an average of 75 hours on training during 2024. Once retail market advisors have become authorised, they must maintain their authorisations, which entails mandatory updates. Each retail market advisor spent an average of just over 35 hours on updating in 2024.
- **Together with other managers and key personnel**, the Management Group undergoes updates in a range of disciplines. In 2024, each member of the Management Group spent an average of more than 7 hours on mandatory refreshers.
- **Board:** All new board members must undergo mandatory board courses. In 2024, each member of the Board of Directors spent an average of almost 3 hours on mandatory updating.
- **The Bank's employees** spend a lot of time on training throughout the year, both through the "Utsikt" programme, and through internally organised training, training concerning the Alliance and training with other external suppliers, such as Spama, Regnskap Norge, DNR Kompetanse, Finance Norway, Visma, the Norwegian Bar Association, BI Norwegian Business School and university colleges/universities. For completion percentages, see the section entitled "Courses" below.

Much of the Bank's training takes place via e-learning, online meetings, webinars and other social media sharing forums.

### Courses and programmes in 2024

The Bank has its own specialist resource which, among other things, acts as editor of the Utsikt training platform, and is responsible for coordinating training and authorisations.

Any training courses employees wish to take must be assessed and approved by the Management Group. An assessment is made of whether the employee needs skills development in their current job, as well as any future job at the Bank. The employee must be given opportunities to train in new fields to adapt to the Bank of the future. SpareBank 1 Helgeland had four employees, three women and one man, in further education in 2024.

The Bank is affiliated to the finance industry's authorisation scheme (FinAut), and the authorisations that the various advisors within the

retail and corporate markets must hold have now been decided. This overview is available on the Bank's intranet.

Number authorised/on hold/undergoing authorisation

	31.12.24	31.12.23
Non-life insurance RM	85	81
Non-life insurance NL	4	4
Personal insurance RM	81	75
Personal insurance NL	7	7
Savings and investment	29	34
Credit	62	61

In addition, 96 of the Bank's advisers/employees in customer positions are approved as "Information providers" in accordance with the authorities' requirements.

Completion rate;

	2024	2023
New employee programme	100%	100%
Anti-money laundering, anti-corruption and GDPR. Various courses are assigned to employees in relation to department and function (10 courses).	Principal course: 99%	Principal course: 99%
	Refresher course: 97%	Refresher course: 96%
Nanolearning on IT security (7 courses)	94%	87%
BankID	Employees with the role of "RA Officer": 100%	Employees with the role of "RA Officer": 100%
	Employees exempt from requirements: 90%	Employees exempt from requirements: 85%
New Insurance Contracts Act	100%	100%
Ethics	100%	100%
Good practice	100%	100%

## METRICS FOR THE WORKING ENVIRONMENT

	31.12.24	31.12.23
Percentage of workforce covered by a health and safety management system	100%	100%
Number of fatalities as a result of work-related injuries and work-related ill health	0	0
Number and rate of recordable work-related accidents	0	0
Number of cases of recordable work-related ill health	1	0
Number of days lost to work-related injuries and fatalities	0	0

*The single case in 2024 was considered, clarified and closed.*

## METRICS FOR WORK-LIFE BALANCE

Both women and men exercise their rights to family-related leave in SpareBank 1 Helgeland.

	2024	2023
Percentage of employees entitled to take family-related leave	100%	100%
Percentage of employees who have taken family-related leave	4.1%	6.0%
Percentage of entitled employees that took family-related leave	3.0%	4.0%
Percentage of men that took family-related leave	5.6%	9.0%

## METRICS FOR REMUNERATION (PAY GAP AND TOTAL REMUNERATION)

	31.12.24	31.12.23
Percentage pay gap between the genders*	12.4%	13.2%
Annual remuneration ratio** for the highest paid individual in the institution	372.2%	359.6%
Average salary, women	NOK 751 201	NOK 715 907
Average salary, men	NOK 857 802	NOK 825 065
Total wage growth, women	4.9%	7.30%
Total wage growth, men	4.0%	2.80%

*\*The gender pay gap is calculated as the difference in average gross hourly wage between the genders as a percentage of the average gross hourly wage for men*

*\*\*Annual total remuneration ratio is calculated as the percentage of the median value for other employees*



Gender equality is a priority area in the Bank's diversity and equality processes in which the Bank will strive to ensure equal pay in comparable positions, regardless of gender.

- The average pay for men and women remain different, the figure for men is about NOK 100 000 higher. However, the gap between the average pay of the genders has closed to some extent over the past few years. In advance of this year's local wage adjustment, we reviewed all employees to look for biases in terms of responsibilities in relation to other comparable roles. This resulted in an adjustment of a total of 105 grades for 19 employees:

Men:	Women:
22 grades spread across six employees	83 grades spread across 13 employees

Together with elected representatives, the Bank focuses strongly on the area of pay. A range of factors influence both the establishment of pay levels and wage developments. It is important to understand this in order to achieve the targets.

## INCIDENTS, COMPLAINTS AND SEVERE HUMAN RIGHTS IMPACTS

The Bank was not subject to any fines or sanctions in 2024, nor was any compensation provided.

In 2024, four reports were received from our own workforce via the Winningtemp system that were considered. Three of these had been closed and one was still being processed as at 31.12.24

For a description of Winningtemp, see the section "Processes to remediate negative impacts and channels for own workers to raise concerns".

# ESRS S3 Affected communities

## STRATEGY

### INTERESTS AND VIEWS OF STAKEHOLDERS

See the description in ESRS2 General Disclosures, Interests and views of stakeholders

### MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

As a local savings bank, a substantial proportion of the profits are distributed to good causes. For 2024, the Board proposes to transfer NOK 51 million to the SpareBank 1's gift foundation and gift fund, for the benefit of young and old alike across Helgeland. In addition, Sparebankstiftelsen Helgeland contributes donations, where the foundation's capital is supplied by the Bank. The contributions to the voluntary sector, sports and culture in Helgeland are crucial in creating a good and attractive region that attracts people who

want to live and remain here. Coupled with the requirement that the measures must be available to all, this is one of the Bank's most important positive footprints in the region, and an actual positive impact. However, we recognise that there may be a potential negative impact if we do not ensure that our criteria for distribution do not harm social or environmental conditions.

The Bank's vision is to be a driving force for growth in Helgeland, and this is an expression of the Bank's values and actions that are rooted in our corporate responsibilities. As a social actor, the Bank aims to be a driving force and a partner in the local community of which it is a part within cultural, sports, talent, education, research and economic development.

The Bank derives its motivation from customers and business partners through a close dialogue, learning and follow-up. The Bank provides financial support to hundreds of activities every single year either through sponsorship funds, direct donations from the gift foundation and gift fund or indirectly via SpareBankstiftelsen Helgeland. Children and adolescents are society's most important future resources, and there is therefore a strong focus on everything that creates a meaningful and content-rich community for children and adolescents. SpareBank 1 Helgeland believes that the private, public and voluntary sectors in Helgeland are all key partners in the efforts being made to make Helgeland a vibrant and thriving society.

Sport and outdoor recreation are part of Helgeland's cultural heritage, and a rich cultural life is a vital factor in the attractiveness of the region. Good sports and cultural facilities attract new people, which Helgeland needs in order to meet the recruitment challenges that the region faces. The formative conditions of children and young people are thus afforded a high priority in the Bank's allocation of funding.

The future will require new knowledge and innovation. Through its gift policy, SpareBank 1 Helgeland is contributing to projects involving university colleges, universities, local knowledge parks and business associations aimed at promoting local expertise and competitiveness.

## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

### POLICIES FOR AFFECTED COMMUNITIES

Relevant governance documents include the "Policy for market communications and society" adopted by the Board of Directors. This policy is related to the social Helgeland Pledge standard. This ensures there is a correlation between the Bank's social engagement and donations from SpareBank 1 Helgeland's gift foundation and gift fund, as well as sponsorship funds. In the current strategy period (up to and including 2024), the strategic goal of the social engagement has been to drive sustainable growth, expertise and collaboration in Helgeland. In the Bank's business

strategy, the Helgeland Pledge is defined as one of our customer promises and describes the targeted use of the Bank's donations and sponsorship funds that we call driving force support.

Both the Bank and the community funds support activities and development in everyday life, sports, culture and social life. We also contribute to realising cultural and sports buildings that are not publicly owned or commercial activities. Our work focuses on all of Helgeland, and we encourage many different activities and forums to sustain people's desire to live and remain here. One important principle for SpareBank 1 Helgeland is that children and young people are the highest priority. We also have five focus areas, where sustainability was included in 2023 as a new focus area. The other four focus areas are sports, culture, skills and social development.

In 2024, the Bank worked on a strategy for how sustainability as a focus area should produce effects, and it therefore created a document describing what types of projects the gift foundation and gift fund should prioritise. This work was done in collaboration with Sparebankstiftelsen Helgeland, which is the Bank's largest owner and also distributes donations to good causes. The Bank is committed to having real impacts on the climate, nature and people, and to benefiting the general public rather than individuals. For the Bank's part, it is also important to more clearly highlight its role of being a local bank by getting this message across.

That means that both the policy for market communication and society and the Helgeland Pledge steer the "Target document for SpareBank 1 Helgeland's gift foundation", which has been adopted by the board of the gift foundation.

#### **The vision document describes the award criteria and award procedures that apply:**

- The purpose must be public and socially beneficial.
- Recipients can be individual projects, people, institutions, non-profit enterprises, foundations or their equivalents.
- It is the benefits the measure provides and the local communities' acceptance that should provide the basis for awards. However, account must be taken of the fact that over time the geographical distribution of donations must be reasonable in relation to the Bank's customer base and the number of inhabitants.
- The target group is initiatives/projects that have a lasting effect and significant potential to strengthen/develop a cause, area, activity or process.
- Measures with a high shared voluntary effort factor/equity contribution are a priority.
- Sustainability: In its award policy, the gift foundation has to take into account the UN

Sustainable Development Goals, the Bank's sustainability strategy and the Bank's social strategy.

#### **Criteria**

SpareBank 1 Helgeland's gift foundation and gift fund have clear award criteria where donations must not be mixed with banking activities and the support must not provide personal or competitive advantages. The gift foundation does not provide support for day-to-day operations, normally does not support public sector initiatives and has a restrictive practice in relation to pilot projects. Donations are time-limited to 2 years, must contribute to local development in Helgeland, prioritise the environment in which children and young people grow up and be value-adding activities that benefit the people of Helgeland.

In our efforts to strengthen the work on sustainability, we have wanted to intensify both the focus and the demands placed on our partners. There is a focus on the following Sustainable Development Goals: good health and well-being; industry, innovation and infrastructure; sustainable cities and communities; responsible consumption and production; and partnerships for the goals. Before a payment is made, the applicant must document this with a report.

The Board of Directors has decided that applications that contribute significantly to at least one of the EU Taxonomy's six defined environmental objectives will be viewed positively. The environmental objectives are:

1. Climate change mitigation
2. Climate change adaptation
3. Sustainable use and protection of water and marine resources
4. Transition to a circular economy
5. Pollution prevention and control
6. Protection and restoration of biodiversity and ecosystems

On the other hand, donations will not be forthcoming if the activity causes substantial harm to any of these environmental objectives or excludes individuals or groups.

A cooperation agreement is always signed between the Bank and the recipient in connection with donations from the gift foundation and gift fund. This ensures that we agree on certain criteria and can set some requirements for the recipient within the areas of the environment, sustainability and diversity. This cooperation agreement applies to all donations of more than NOK 100 000 in annual driving force support. In addition to specifying what it says above, specific goals are set for all agreements. We maintain a dialogue about this during the agreement period, which is 3 years.

#### **PROCESSES FOR ENGAGING WITH**

## AFFECTED COMMUNITIES ABOUT IMPACTS

Over time, efforts have been made to standardise and improve access to the scheme we call driving force support. Since 2018, it has become increasingly easier to show and explain what the Bank's community funds and sponsorships can, and do, go to, and how volunteers can ensure that their application is also considered and treated fairly. This should not depend on having a relationship with the Bank or any of its employees, and nor should it depend on some areas and interests being valued more highly than are others. It should always be about benefiting the general public and local communities without adversely affecting any groups. The same processes and documentation requirements should apply to everyone. The Bank holds sponsorship seminars every second year in which inclusion and combating exclusion are on the agenda.

Some of the improvements made in 2024 include new websites and targeted advertising. Furthermore, the direct engagement with partners as a group is good, and we have put in place a new system and guidelines for processing applications. The new sponsorship portal ensures professionalism with respect to conflicts of interest and good routines for following up applications, reporting and payments. A great deal of work has been put into standardising how many the activity will benefit in the awarding of donations, and we are careful to look at the breadth and diversity of activities and who receives support, including geographically. We have also launched a map of all the donations made so that we are open and transparent about what we give back to society.

Digital application processes are a keyword for ensuring every application is properly and fairly processed. Stakeholder engagement mainly takes place over the phone and via email, in-person meetings and the sponsorship portal. Those involved on behalf of the Bank are the general manager of SpareBank 1 Helgeland's gift foundation and gift fund, the head of marketing and communication, the sponsorship coordinator and the bank managers in the four cities.

### Assessment

All applications are received digitally in the sponsorship portal, which is our system for processing applications for driving force support and cooperation agreements.

Once an application has been received, the general manager of the gift foundation and gift fund receives, assesses and makes recommendations concerning the application based on the Bank's marketing, communications and community policy and the Helgeland Pledge standard.

The bank managers, sponsorship coordinator and/or head of marketing and communication can provide input on the application and amount of the award digitally via the sponsorship portal at the request of the general manager of the gift

foundation and gift fund before the application and recommendation are forwarded for consideration by the gift foundation and gift fund. The deadline for input is 14 days after the application deadline.

### Consideration

We must ensure that applications are received and considered in a transparent and verifiable manner. All application processing must be documented in the sponsorship portal. Applications that are considered by the gift foundation must also be documented in the gift foundation's own processing system.

## PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR OWN WORKERS TO RAISE CONCERNS

SpareBank 1 Helgeland provides a number of ways in which customers or external stakeholders can express concerns about the Bank's activities. If customers or partners are dissatisfied with something, they can lodge a digital complaint on the website.

SpareBank 1 Helgeland should be known for its high ethical standards and good corporate governance. As a responsible corporate citizen, parties other than employees must also be able to raise concerns related to the Group's activities. This whistle-blowing channel is also available on the website.

In 2024, we received 35 customer complaints, but no processed reports via the external and independent whistle-blowing channel. Reports were received by the external provider of the channel but were rejected as not relevant.

## TAKING ACTION ON MATERIAL IMPACTS ON AFFECTED COMMUNITIES, AND APPROACHES TO MITIGATING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO AFFECTED COMMUNITIES, AND EFFECTIVENESS OF THOSE ACTIONS

A number of actions were taken in the reporting year. The formative conditions of children and young people have a high priority in the Bank's allocation of funding. We know that the years of childhood and youth have a great significance on people's ability to cope later in life, and in Helgeland there are many voluntary clubs and organisations that do an amazing amount of work for children and young people. This is something we value highly and we want to be an active contributor and motivator for this through our donation policy.

### Industry, knowledge, research and education

The future will require new knowledge and innovation, and, through its gift policy, SpareBank 1 Helgeland is contributing to projects involving university colleges, universities, local knowledge parks and business associations aimed at

promoting local expertise and competitiveness. Almost 20% of the Bank's total donations have gone to business, knowledge, research and innovation initiatives since its donation activities began in 2007.

### The young people's economist

The aim is to offer courses such as "Economics and career choices" to all year 9 pupils and "Boss of your own life" to all high school students in Helgeland. With a full-time young people's economist, we have almost achieved this goal

The young people's economist is also used in other training measures such as innovation camps, holiday home courses and financial training for speakers of a foreign languages. These measures are important with respect to equipping young people in Helgeland with the skills and knowledge they will need in the future.

Funds were also allocated to job and education fairs for the school year 2023-2024 that give young people an opportunity to explore different career paths. The Scientist Factory's Summer School also received support. This promotes an interest in science, technology and natural sciences among young people. All in all, we are constantly working to strengthen and expand our offerings to young people in Helgeland.

The young people's economist has submitted their own report on their work in the field at the various schools in Helgeland. This provides the basis for payments of driving force support from the gift foundation.

### The Driving Force (Drivkraft) Award 2024

The Driving Force Award was presented at this year's Driving Force Conference in Mo i Rana and was won by Kjell Vidar Norheim from Hattfjelldal. The winner received the award for his magnificent, tireless work for athletics in Hattfjelldal and Helgeland. Thanks to his targeted, inclusive approach, the winner has helped develop talented athletes who rank among the top 10 at a national level. The winner receives NOK 100 000, to be donated to one or more good causes in Helgeland, in addition to a work of art. The award money was transferred by the winner to a newly established local talent fund that can make grants to talented athletes every year in Hattfjelldal Athletics Club.

Sparebank 1 Helgeland's gift foundation presents the annual Driving Force Award after considering selected candidates from across Helgeland.

### The Bank's donations in 2024

In 2024, sports and cultural life normalised after the years of pandemic. Many measures, projects and events were carried out, and the activity in Helgeland was good. The Bank's gift foundation and gift fund, as well as the sponsorship funds, have contributed driving force support for cultural life throughout Helgeland more dynamic, including through music festivals,

Pride celebrations, concerts, conferences, sports events and theatre productions. We provided more than NOK 11 million in driving force support. Approximately NOK 8 million of this came from SpareBank 1 Helgeland's gift foundation and gift fund. The focus was on children and young people, and the support contributed to the growth and sustainability of local communities. Major donations included support for the Roots Festival, Verket Music Festival, Havna Festival, Træna Festival and a major student recruitment project for the whole of Helgeland. In addition, substantial support was provided to sports clubs in Helgeland for development, initiatives and cups and competitions. This helped to promote sports, physical activity and outdoor activities in Helgeland.

## METRICS AND TARGETS

### TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

#### Goals

The sustainability strategy includes a number of actions. Contributions to clubs, associations and partners/requirement for inclusion in events (in this context an event means any organised activity that occurs one or more times).

1. SpareBank 1 Helgeland must ensure sustainability is on the agenda in the sponsorship seminars it holds every second year. This was done in 2023, when the Bank held sponsorships seminars, and will be done again in 2025.
2. SpareBank 1 Helgeland will develop procedures and guidelines for monitoring partners' expectations in relation to sustainability and inclusion with the aim of achieving "as many as possible for as long as possible" and preventing exclusion and dropping out, especially in relation to sports. The purpose is addressed in written cooperation agreements, as well as the reporting to SpareBank 1 Helgeland's gift foundation and gift fund by partners during the reporting period.
3. Purchases of promotional articles must be assessed on the basis of sustainability, and they must be quality articles with a long shelf life. The consumption of promotional articles must be halved in relation to the purchasing figures for 2021. The reduction has been addressed in the budget process and new routines and stricter guidelines have been introduced for the use of promotional merchandise.



# ESRS G1 Business conduct

## GOVERNANCE

### THE ROLE OF THE ADMINISTRATIVE, SUPERVISORY AND MANAGEMENT BODIES

The scope of financial crime being committed through banking and financial institutions is increasing, and since criminals are becoming increasingly professional, the complexity of the criminal activities is also increasing. The financial industry is in a special position in society because its key infrastructure can be used as a tool for criminal offences. SpareBank 1 Helgeland actively works to prevent, detect and report transactions related to money laundering or terrorist acts. This is a statutory duty and has a major impact on the confidence in the Norwegian welfare state and financial sector, both nationally and internationally. This topic is important for all of our stakeholders and we invest substantial resources in this work.

Financial crime includes actions that harm individuals, business and society, and can have negative consequences for confidence in the Norwegian welfare state. According to various threat assessments, banking and finance are particularly vulnerable to employees who commit criminal acts alone or in collaboration with criminals. Thanks to its duty to report under the Anti-Money Laundering Regulations, SpareBank 1 Helgeland has a statutory duty to implement measures to combat money laundering and terrorist financing.

#### Internal irregularities and corruption

Internal irregularities and corruption are destructive for society as a whole and undermine legitimate business activities and competition. Being associated with internal irregularities and corruption can damage an organisation and its reputation, and also result in criminal sanctions, loss of contracts or other financial loss. The term irregularities includes both criminal and non-criminal matters and can be committed as, for example, embezzlement, theft, fraud, corruption and breaches of confidentiality and/or ethical guidelines.

#### Data security and privacy

Data security and privacy are key in all operations, we cooperate closely with the SpareBank 1 Alliance in this area. SpareBank 1 Helgeland processes personal data as part of its day-to-day operations with the overall goal of safeguarding data subjects' rights and freedoms in the area of privacy. The Bank's security is designed to protect customers, employees, company assets, information and reputation. The work on information security must support the current business strategy and ensure that information is processed in a satisfactory manner. SpareBank 1 Helgeland must also ensure that the Bank complies with the information

security requirements in applicable laws and regulations at all times.

#### The Board of Directors

The Board approves the governance document for the area, and the responsible business area in the Bank reports on status to the Board on a regular basis.

**Responsibility for the area:** The Risk Management Director bears overall responsibility for risk management and financial crime, including overall responsibility for irregularities and corruption. The Business Development Director bears overall responsibility for IT, including data security and privacy.

**Objective:** Retain the confidence of the authorities, customers, partners and competitors by preventing, detecting and handling transactions related to money laundering, terrorist financing and other financial crime.

## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

**DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES** See "Description of the processes to identify and assess material climate-related impacts, risks and opportunities" in the chapter on ESRS2 General Disclosures.

### BUSINESS CONDUCT POLICIES AND CORPORATE CULTURE

**Key governance documents:** Code of conduct, standard for anti-money laundering and terrorist financing, procedure for reporting suspicious transactions and managing fraud cases, employee risk assessments, managing conflicts of interest, whistle-blowing

The Bank's code of conduct covers areas such as corruption, inside information, money laundering and terrorist financing. The Group states in its policy that it has zero tolerance for any kind of internal irregularities and corruption.

All employees are familiarised with the anti-corruption policy through training and awareness campaigns. If the policy is nonetheless breached, this will result in sanctions for those involved.

#### Actions:

- Reporting to the Board of Directors
  - Annual report on financial crime
  - Annual governance assessment: Updated regularly throughout the year, but approved by the Board of Directors annually.
  - Quarterly risk reports: The report includes a section dedicated to financial crime.
  - Quarterly risk assessments from Management Group: This includes a risk assessment regarding financial crime.

- Annual reporting to the Board of Directors on the status of status privacy.
- Quarterly data security reporting via SLA report
- Regular updating of policies and standards in the area
- Other ad hoc reports ordered by the Board of Directors as required
- Screening of commercial factors for all CM customers with commitments of more than NOK 5 million using the ESG module
- Training and skills development for employees within financial crime, data security and privacy
- Cooperating with relevant authorities where necessary to detect and combat financial crime
- Due diligence and reporting on compliance with the Transparency Act

There are a number of mechanisms for identifying conduct that breaches the Bank's ethics rules and managing conflicts of interest. The Board of Directors, CEO, Management Group and other key personnel are subject to suitability assessments. There is a specific procedure for managing conflicts of interest and options for reporting irregularities via both internal and external channels. The Bank has its own whistle-blowing reports group that deal with reports, and there is a comprehensive procedure that describes the Group's work, who should handle the cases, requirements for written reports, requirements for assessing impartiality and whistle-blower protection. The procedure for following up whistle-blower reports states that: "When you submit a report in line with this policy, you, as the whistle-blower, are protected against reprisals for submitting a report ("retaliation"). As an employer, we must ensure you have a fully justifiable working environment. If deemed necessary, action must be taken to prevent any retaliation."

## MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS

### Responsible purchasing

SpareBank 1 Helgeland's purchases comply with its instructions for purchasing and entering into agreements. These cover competitive tendering, professionalism and compliance with regulations and due diligence in line with the Transparency Act. They ensure equal treatment and that suppliers are treated fairly.

### Value chain follow-up

We purchase a lot. We are conscious of the power we have from being able to set requirements and expectations for suppliers. This can help reduce the negative impacts on the environment and social conditions, and contribute to ethical business conduct.

SpareBank 1 Helgeland sets requirements for environmental, social and business conduct

matters. Purchases are made via two main channels. These are: direct purchases and purchases made via the Alliance through SpareBank 1 Utvikling. Common guidelines are used in both cases.

### Due diligence in SpareBank 1 Utvikling DA and SpareBank 1 SamSpar AS

Alliance Purchasing has risk assessed 249 suppliers. The sustainability status of 36 were of them were investigated and 12 were selected for in-depth sustainability surveys. Furniture and IT equipment suppliers underwent in-depth surveys due to potential human rights risks. IT services, consulting companies and staffing services, despite representing a lower risk, were also included in the in-depth surveys due to the high volume of purchases. The general survey included medium-risk suppliers who were not subject to an in-depth survey (Source: report, SpareBank 1 Utvikling DA).

SpareBank 1 Helgeland is one of the owners of SpareBank 1 SamSpar AS (SamSpar). The company is obliged to report in line with the Transparency Act. In 2023, procedures were established to ensure compliance with the Act, including embedding the work on the Transparency Act, supplier declarations, questionnaires and a routine for processing requests for information. SpareBank 1 Utvikling assessed two of the companies that met the limit values for due diligence.<sup>11</sup>

### Due diligence in SpareBank 1 Helgeland

SpareBank 1 Helgeland's due diligence is valid for 2 years. In 2023, we considered conducting due diligence of 111 suppliers or business partners not covered by Alliance agreements. Of these, 62 that met the criteria for assessment underwent due diligence processes. In 2024, four business partners underwent due diligence processes. The criteria for this are: Turnover from agreements with the Bank amounting to at least NOK 100 000, that it is not retail trade and that they are companies over which SpareBank 1 Helgeland is deemed to have influence. Of these, none were assessed as representing a high risk of breaches, although two were assessed as representing a moderate risk. None of the companies were in industries with inherently elevated risk according to the overall risk assessment. A full account of SpareBank 1 Helgeland's due diligence carried out in line with the Transparency Act is available in the sustainability library on the Bank's website. A new statement will be published by 30.06.2025.

### Payment practices

The Bank's payment practices entail that we pay our suppliers by their specified deadlines and due dates. In case of disagreements about amounts, services, etc. payment is withheld if necessary.

## PREVENTION AND DETECTION OF CORRUPTION AND BRIBERY

SpareBank 1 Helgeland works systematically to identify and combat financial crime, including

<sup>11</sup> <https://www.sparebank1.no/content/dam/SB1/vedlegg/rapporter/SamSpar-Rapport-apenhetsloven-2023.pdf>

money laundering, terrorist financing and fraud. The Bank also has appropriate procedures in place to reduce the risk of financial crime and detect and follow up indications thereof. Authorities, customers and competitors must have confidence in the Bank's professionalism and integrity.

In 2024, the Bank implemented measures to ensure compliance with applicable instructions, procedures and routines, including the allocation of more resources and the addition of expertise to ensure the enforcement of regulatory and internal requirements. Customers are monitored continuously. Suspicious transactions are dealt with and reported to the National Authority for Investigation and Prosecution of Economic and Environmental Crime in Norway (Økokrim) if certain criteria are met. Monthly reports are submitted to the Bank's Management Group, and quarterly reports are submitted to the Board of Directors on the area of financial crime.

### Training and skills development within financial crime

To prevent financial crime, it is important that the workforce receives training and skills development in this area and knows how to identify financial crime.

In 2024, employees, RM and CM advisors, the Board of Directors and the Management Group completed an anti-money laundering course.

Courses have also been arranged on issues such as corruption for the Bank's employees.

The Group also provides employees with training in data security and privacy. More on this can be read in the chapter on the Group's own workforce.

Number who have received training	Managers	Administrative, supervisory and management bodies	Other own workforce
<b>Number trained</b>			
Total number	30	7	161
Total number trained	30	7	159
<b>Type of training and duration</b>			
Classroom teaching	0	0	0
IT-based training	30	7	159
Voluntary IT-based training	0	0	0
<b>Frequency</b>			
Frequency of training	Ongoing training	Annual	Ongoing training
<b>Training topics</b>			
Cash services in-store	21	0	124
Money laundering risk in property transactions	21	0	123
Terrorist financing	30	0	158
High-risk industries	13	0	43
Cryptocurrency	28	0	150
General updating	29	0	145
Sanctions	21	0	81
Trends	19	0	111

## METRICS AND TARGETS

### INCIDENTS OF CORRUPTION OR BRIBERY

#### Status for 2024

- Zero internal or client portfolio instances of corruption and bribery registered in 2024.
- There were no reported privacy or security breaches which resulted in fines or sanctions being imposed on the Group in 2024.
- SpareBank 1 Helgeland reported zero breaches of privacy to the Norwegian Data Protection Authority in 2024.
- SpareBank 1 Utvikling reported five breaches to the Norwegian Data Protection Authority on behalf of Alliance banks in 2024.
- SpareBank 1 Utvikling reported 19 breaches of the ICT Regulations on behalf of Alliance banks to the Financial Supervisory Authority of Norway in 2024.

A photograph of a residential street at night. On the left, a modern house with a balcony is lit up. On the right, a row of colorful houses (yellow, red, and blue) is visible. A paved road runs along the houses. In the background, a body of water and distant mountains are visible. The sky is dark blue with a vibrant green Aurora Borealis (Northern Lights) display. A large, light blue curved shape is overlaid on the bottom left of the image, containing the text.

# Board of Directors' Report and Annual Financial Statements 2024





# Board of Directors' Report 2024

## Introductory remarks 2024

SpareBank 1 Helgeland is an independent savings bank with a clear objective of being the leading bank and a driving force for growth in Helgeland. Our local bank is the leading bank, and a profitable one at that, that is assuming active social responsibility for building the Helgeland of the future. SpareBank 1 Helgeland is the only bank with its head office in the region. The Bank's strong market position coupled with professional expertise, competitive prices and good access to capital means that the Bank is well equipped in a time marked by strong competition and pressure on margins. The Bank has branches in the four cities of Helgeland.

### KEY FIGURES

- It has been a year characterised by high net interest income, good returns on financial investments and continued significant impairments on loans.
- Net income before tax amounted to NOK 743 million, compared with NOK 650 million in 2023.
- Net interest income of NOK 1 012 million, representing an improvement of NOK 27 million over the previous year
- Return on equity after tax (adjusted for hybrid capital) of 11.8% (10.4%)
- Common Equity Tier 1 capital adequacy ratio of 17.8% (18.2%) and leverage ratio of 9.2% (9.1%)
- The Board of Directors is proposing to the Supervisory Board that a dividend of NOK 8.40 per equity certificate be distributed for 2024.

### ABOUT SPAREBANK 1 HELGELAND

#### HISTORY

On 01.04.05, the current SpareBank 1 Helgeland was formed through a merger between Sparebanken Rana and Helgeland Sparebank.

Helgeland Boligkreditt AS was founded in November 2008 as a wholly owned subsidiary of the Bank. The institution was licensed as a financial enterprise in February 2009 and was established to act as the Bank's company for the issuing of covered bonds.

On 26.10.10, the Bank's Supervisory Board decided to convert some of the Bank's primary capital into equity share capital by issuing equity certificates. The new equity certificates were issued free of charge to Sparebankstiftelsen Helgeland, which was established concurrently with the conversion. The Bank issued equity certificates amounting to a total of almost NOK 605 million, which was transferred to the foundation.

In March 2021, SpareBank 1 Helgeland joined the SpareBank 1 Alliance. Much of SpareBank 1 Nord-Norge's business in Helgeland was also transferred to the Bank in connection with this.

## VISION, MISSION AND STRATEGY

The Group's vision is to be a driving force for growth in Helgeland. The mission is to be a profitable and leading local bank which builds the future of Helgeland. SpareBank 1 Helgeland shall offer financial products and services to private customers, small and medium enterprises, municipal authorities and institutions linked to Helgeland.

The Group has a strategic goal of maintaining its strong market position and being an active support player in the development of the region. The lending activities are concentrated in Helgeland. The Group strives to be an attractive, positive and nurturing employer and endeavours to establish an equal gender balance as regards representation on governance bodies and management.

SpareBank 1 Helgeland's aim is to provide its shareholders with a strong and stable long-term return in the form of dividends and increases in value. The two owner groups are to be treated equally. At least half of the profit must generally be distributed in the form of dividends and gifts.

The Group has a long-term profitability target of a return on equity at least on a par with comparable banks, currently 12% after tax. The target for the cost/income ratio is a maximum of 40%, for the deposit-to-loan ratio it is at least 60% including transferred loans to the mortgage credit institution, and for the retail market share it is at least 60% including transferred loans to mortgage credit institutions.

The target figures for Common Equity Tier 1 ratio and total capital adequacy are 1.3 percentage points above the relevant regulatory requirements. These requirements are currently 16.5%, and 21.0%, respectively.

## THE GROUP'S SPHERE OF OPERATIONS

Helgeland Sparebank's operations primarily comprise traditional banking and financial services in the Helgeland region, along with the sale of savings products, investment and insurance products, leasing and mortgages.

The Group mainly serves the retail market, business, trade and industry, groups/associations and the public sector in Helgeland.

The Group also carries on property letting through its subsidiaries and has strategic holdings in associated companies and product companies.

## SUBSIDIARIES

### HELGELAND BOLIGKREDITT AS

The institution is licensed as a mortgage credit institution with a permit to issue covered bonds. Its main purpose is to secure the Group stable and long-term financing on competitive terms. The Bank owns all of the shares in the mortgage credit institution. The CEO is hired from the Bank on a 25% full-time equivalent basis. Transferred loans to Helgeland Boligkreditt will

be reduced as the borrowing in the institution matures. This is a consequence of the transition to the SpareBank 1 Alliance, and funding via SpareBank 1 Boligkreditt. The mortgage credit institution is to continue operating with total assets of around NOK 4 billion.

### AS SPAREBANKBYGG

The business consists of owning and leasing out premises in Storgt. 75 in Brønnøysund, where the Bank is the largest tenant. The company is based in Brønnøy Municipality. The Bank owns all of the shares in the mortgage credit institution. The company has no employees.

### SPAREBANK 1 HELGELANDS EIENDOMSSELSKAP AS

The company carries on the letting of property and is based in Mosjøen, where the Bank is the largest lessee. The Bank owns all of the shares in the mortgage credit institution. The company has no employees.

### BANKBYGG MO AS

The business consists of owning and managing the letting of commercial premises at Jernbanegata 15 in Mo i Rana. The Bank is the largest tenant in the building and owns 99.7% of the shares in the company. The company has no employees.

### STORGT. 73 AS

The company is a property company in Brønnøysund. The Bank owns all of the shares in the mortgage credit institution. The company has no employees.

## PRODUCT AND ALLIANCE COMPANIES

The SpareBank 1 Alliance is Norway's second largest financial grouping, and comprises 12 independent banks that are all fully fledged providers of financial products and services to individuals, businesses and organisations.

The SpareBank 1 Alliance is designed to ensure the individual bank's independence, regional anchoring, profitability and financial strength by sharing development costs, achieving economies of scale and building up vital expertise. The SpareBank 1 Alliance currently has around 10 500 employees in total, with around 2 600 employees linked to SpareBank 1 Gruppen AS and SpareBank 1 Utvikling DA and subsidiaries.

### SPAREBANK 1 GRUPPEN AS

The Bank has an indirect stake in a number of alliance companies through its 4.1% holding in Samarbeidende Sparebanker AS. This corresponds to an indirect stake of 0.80% in Fremtind Forsikring AS.

### SPAREBANK 1 BETALING

SpareBank 1 Helgeland has a 3.22% stake in the company and aims to further develop Vipps together with the company's other owners.

### SPAREBANK 1 FINANS NORD-NORGE AS

SpareBank 1 Finans Nord-Norge AS is a Norwegian financial institution. The company offers leasing and secured loans, with Northern Norway as the primary market area. The Bank has a 15% stake in the institution.

### SPAREBANK 1 BOLIGKREDITT AS

SpareBank 1 Boligkreditt AS was created by the banks in the SpareBank 1 Alliance in order to take advantage of the market for covered bonds. SpareBank 1 Boligkreditt has IRBA approval. Ownership in SpareBank 1 Boligkreditt AS is based on a dynamic model, where the size of the stake varies with the transferred size of the portfolio, sold by the individual bank. At the end of 2024, SpareBank 1 Helgeland has a stake of 2.93%, and a volume of NOK 8 555 million in transferred loans.

### EIENDOMSMEGLER 1 NORD-NORGE AS

EiendomsMegler 1 Nord-Norge AS is a Norwegian estate agent. The Bank had a 15% stake in the company. EiendomsMegler 1 Nord-Norge AS is a member of a nationwide alliance with other real estate companies owned by the SpareBank 1 banks. The company is the market leader in Northern Norway, and has retained its position in a growing overall market in most of the cities in the north.

### REGNSKAPSHUSET SPAREBANK 1 NORD-NORGE

SpareBank 1 Regnskapshuset Nord-Norge AS is a Norwegian accountancy firm. The company is a leading provider of a complete range of accountancy and advisory services for businesses, clubs and associations in Northern Norway. The Bank has a 15% stake in the institution.

### KREDITTBANKEN ASA

Kredittbanken ASA is a Norwegian credit institution. The company offers products such as credit cards, consumer loans and the refinancing of consumer debt. The Bank had a 3.18% stake in the company at the end of 2024. Ownership in Kredittbanken ASA is based on a dynamic model, where ownership varies with the individual bank's share of business volume in the company. The banks in the Eika Alliance joined the product company in January 2025.

## MARKET

The Bank has its main market in the 18 Helgeland municipalities bounded by Saltfjellet in the north and Trøndelag in the south. The largest towns/urban areas in the market are Mo i Rana, Brønnøysund and Sandnessjøen. The population of these municipalities accounts for approximately 60% of the entire population of Helgeland, which is approximately 78 000 inhabitants. The main competitor in Helgeland is DNB Bank ASA. SpareBank 1 Helgeland enjoys a strong and leading market position in the retail market. The competition is significant across the entire market area.

SpareBank 1 Helgeland offers advice and financial solutions to its customers through competent advisors. The Bank has an extensive distribution network across Helgeland, as well as modern solutions for serving customers via digital channels.

SpareBank 1 Helgeland also has a strong market position with regard to small and medium enterprises, with an estimated market share of around 60% in Helgeland. In the agricultural segment, the Bank is market leader, with a market share of around 80%.

The Bank's industry portfolio mainly consists of small and medium enterprises across a variety of industries. The Bank's advisors possess expertise in many industries and offer professional advice to the business sector. The Bank's market area is Helgeland. In exceptional cases are good corporate customers are followed out of the region.

## CORPORATE SOCIAL RESPONSIBILITY AND SUSTAINABILITY

In 2024, a number of major measures were implemented in order to promote the work relating to sustainability and social responsibility within the enterprise.

The Bank has started to close the gaps between sustainability reporting prepared in 2024 and in relation to the CSRD to which we will become subject in the years to come. In 2024, the Bank therefore updated its double materiality assessment and prepared a transition plan. The CSRD requirements that will guide the Bank's sustainability and ESG work going forward.

An account of the work relating to corporate social responsibility and sustainability can be found in a separate chapter in the annual report. This includes information on how the Bank works with regard to the environment, social conditions, working environment, equality and non-discrimination.

## SOCIAL ENGAGEMENT

As a local savings bank, we distribute a significant proportion of our profits to socially beneficial causes. For 2024, the Board proposes to transfer NOK 57.3 million to the gift foundation and gift fund, for the benefit of young and old alike across Helgeland. In addition, the Sparebankstiftelsen Helgeland foundation is contributing gift awards. The foundation's capital is provided by the Bank.

The Bank's vision is to be a driving force for growth in Helgeland, and this is an expression of the Bank's values and actions that are rooted in our corporate responsibilities. As a social actor, the Bank aims to be a driving force and a partner in the local community of which it is a part within cultural, sports, talent, education, research and economic development.

The Bank derives its motivation from customers and business partners through a close dialogue, learning and follow-up. The Bank provides financial support to hundreds of activities every year either through direct donations from the gift foundation or indirectly via SpareBankstiftelsen Helgeland. Children and adolescents are society's most important future resources, and there is therefore a strong focus on everything that creates a meaningful and content-rich community for children and adolescents. SpareBank 1 Helgeland believes that the private, public and voluntary sectors in Helgeland are all key partners in the efforts being made to make Helgeland a vibrant and thriving society.

Sport and outdoor recreation are part of Helgeland's cultural heritage, and a rich cultural life is a vital factor in the attractiveness of the region. Good sports and cultural facilities attract new people, which Helgeland needs in order to meet the recruitment challenges that the region faces. The formative conditions of children and young people are thus afforded a high priority in the Bank's allocation of funding.

The future will require new knowledge and innovation. Through its gift policy, SpareBank 1 Helgeland is contributing to projects involving university colleges, universities, local knowledge parks and business associations aimed at promoting local expertise and competitiveness.

## CORPORATE GOVERNANCE

SpareBank 1 Helgeland's principles and policy for corporate governance are intended to ensure that the Bank operates in accordance with applicable laws and regulations, as well as recognised practices and standards. Good corporate governance within SpareBank 1 Helgeland encompasses the values, goals and general principles by which the Bank is governed and controlled. This is in order to ensure good cooperation between the Bank's various stakeholders, such as equity certificate holders, creditors, customers, employees, Management Group, governance bodies and society at large. Corporate governance should ensure prudent asset management and give greater assurance that communicated goals and strategies are being implemented and achieved. The Group's risk strategy and the overall management of operational risk are set out in governance documents, which are reviewed annually by the Board. These governance documents form an important part of the Group's internal framework for good governance and control, and provide guidelines and frameworks for the Group's overarching approach to its risk profile and risk management.

The Board considers that the Bank's corporate governance is satisfactory and in accordance with Norwegian recommendations.

A more comprehensive account of corporate governance can be found in a separate chapter of the annual report.

## ANNUAL FINANCIAL STATEMENTS 2024

### ACCOUNTING POLICIES

SpareBank 1 Helgeland prepares the consolidated and parent bank financial statements in accordance with IFRS® Accounting Standards as approved by the EU (IFRS). The Group's accounts are a consolidation of the parent bank and the subsidiaries. A more detailed description of the accounting policies can be found in the notes to the annual report.

The annual accounts are presented in accordance with the going concern principle. The Group is not involved in any legal disputes that are considered to be of any significance as regards the Group's solvency or profitability. The Board is not aware of any circumstances after year end which could have a significant impact on the annual accounts. The figures stated in this report are generally consolidated figures, unless stated otherwise.

### KEY FIGURES 2024

The Group recorded a net income before tax of NOK 743 million (NOK 650 million). A net profit of NOK 571 million (NOK 490 million) produces a return on equity after tax adjusted for hybrid capital of 11.8% (10.4%). Earnings per equity certificate amount to NOK 16.20 (NOK 13.90).

KEY FIGURES 2023 (NOK MILLIONS)	31.12.24	31.12.23	CHANGE
Net interest income	1 012	985	27
Operating costs	427	414	13
Net income from financial investments	77	15	62
Losses on loans	102	100	2
Return on equity % excl. hybrid capital	11.8%	10.4%	1.4%
Earnings per equity certificate	16.2	13.9	2.3
Total Common Equity Tier 1 capital ratio %	17.8%	18.2%	-0.4%
Loan losses % of gross lending, incl. transferred loans	0.26%	0.27%	-0.01%
Development in gross lending, incl. mortgages	5.8%	1.7%	4.1%
Development in customer deposits	1.6%	-1.8%	3.3%

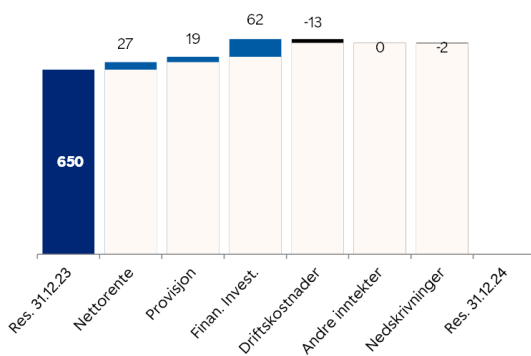
A dividend ratio of 52.5% (75%) of the dividend basis is proposed, giving a cash dividend of NOK 8.40 (NOK 10.80) per equity certificate. This corresponds to a dividend payout ratio of 50% of the Group's profit after tax.

- Net income before tax of NOK 743 million (NOK 650 million)



- Net interest income of NOK 1 012 million (NOK 985 million)
- Net income from financial assets and liabilities NOK 77 million (NOK 15 million).
- Net commission income and other operating income amounted to NOK 183 million (NOK 164 million).
- Impairments of loans totalling NOK 102 million (NOK 100 million), or 0.26% (0.27%) of gross lending incl. transferred loans.
- Costs as a percentage of income 33.6% (36.0%)
- Return on equity after tax, excluding hybrid capital, of 11.8% (10.4%).
- Lending growth, including transferred loans, of 5.8% (1.7%) in the past 12 months.

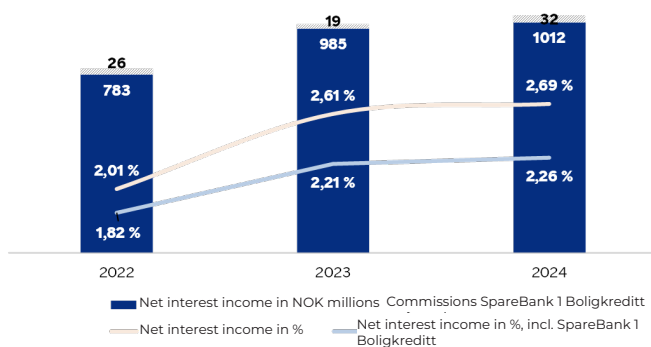
#### Change in profit before tax (NOK millions)



#### NET INTEREST INCOME

For 2024, net interest and credit commission income amounted to NOK 1 012 million (NOK 985 million), an increase of NOK 27 million over the previous year. As a percentage of average total assets, this amounts to 2.69% (2.61%). Including commission income for loans transferred to mortgage credit institutions, net interest income amounts to NOK 1 004 million (NOK 1 004 million) as at 31.12.24. As a percentage of total assets, including transferred loans, net interest income was 2.26% (2.21%) at the end of the year.

#### Net interest income (NOK millions) and as % of total assets



#### NET COMMISSION INCOME

In 2024, net commission income and other operating income amounted to NOK 183 million (NOK 164 million) or 0.49% (0.43%) of average total assets. Of this amount, commission income from SpareBank 1 Boligkreditt amounts to NOK 32 million (NOK 19 million).

The level of commissions increased somewhat throughout 2024, the increase was mainly related to increased commissions from SpareBank 1 Boligkreditt, as well as increased commissions from sales of insurance products. Broad sales with a focus on insurance, leasing and refinancing will remain priority areas for the Bank.

#### NET INCOME FROM FINANCIAL INVESTMENTS

For 2024, financial investment earnings amounted to NOK 77 million, NOK 62 million higher than for 2023, and this was mainly attributable to increased share dividends, unrealised gains from shares and a higher profit contribution from SpareBank 1 Gruppen. NOK 13 million was also recognised as income from Eika Gruppen joining Fremtind Forsikring.

The profit from financial instruments in 2024 was affected by relatively stable financial markets and good results from product companies.

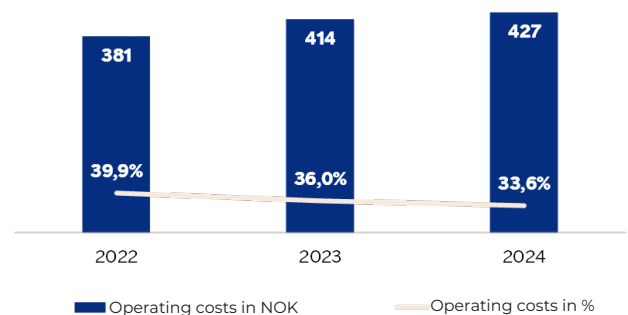
The securities portfolio fell in value by NOK 6 million in 2024, while the value of fixed-rate lending and fixed-rate deposits increased by NOK 10 million. Interest derivatives not included in hedge accounting saw a decrease in value of NOK 1 million. Dividends on shares, change in value and shares of earnings from jointly controlled enterprises made a positive contribution of NOK 22 million in 2024.

In the Parent bank, dividends from Helgeland Boligkreditt are recognised in the amount of NOK 21 million during the first quarter of 2024.

#### OPERATING COSTS

Total operating costs for 2024 amounted to NOK 427 million (NOK 414 million). As a percentage of income, the cost/income ratio was 33.6% (36.0%). The increase in operating costs was largely due to price increases, but also effects related to increased consumption of external services and licences. Excluding income from financial investments, the key ratio becomes 35.8% (36.5%). The Bank's target cost level is 40% of total revenue.

#### Operating costs (NOK millions) and as % of income



The Bank's sickness absence rate was higher than in 2023 at 7.2% (4.3%).

## EXPENSED WRITE-DOWNS ON COMMITMENTS

For the year, losses on loans and guarantees are recognised in the amount of NOK 102 million (NOK 100 million). As a percentage of gross lending, including transferred loans, this amounts to 0.26% (0.27%).

As in 2023, 2024 was characterised by significant losses, especially for the corporate market. High interest rates and higher costs are starting to negatively impact customers. In recent years, the Bank has seen an increase in bankruptcies among smaller companies and companies within building and construction and property development, which also affected recognised impairments in 2024.

## BALANCE TRENDS

Total assets amount to NOK 39.0 billion. During the past 12 months, total assets decreased by NOK 2 113 million (NOK -1 764 million), or 5.7% (-4.6%). The increase in total assets was mainly due to lending growth in 2024. Including transferred loans, total assets amounted to NOK 47.5 billion (NOK 45.4 billion).

## CASH FLOW

The cash flow statement shows how SpareBank 1 Helgeland has received and utilised liquid assets. This has been prepared on the basis of gross cash flow from operational, investment and financing activities. Liquidity holdings have increased by NOK 540 million since year end.

## LENDING

At year end, gross lending including transferred loans to mortgage enterprises amounts to NOK 40 174 million. Of the Group's gross lending, 80.1% (82.8%) was loaned to customers in Helgeland. Lending growth for the year, including transferred loans, was 5.8%.

Of total loans, NOK 29 183 million or 72.6% (72.1%) of loans were issued to retail customers. Of this, NOK 8 555 million was transferred to SpareBank 1 Boligkreditt. Total loans to the retail market have increased by NOK 1 792 million (NOK -93 million), or 6.5% (-0.3%), over the past 12 months. At the end of the year, lending for commercial commitments amounted to NOK 10 991 million (NOK 10 591 million). Of this amount, NOK 103 million was transferred to SpareBank 1 Boligkreditt. In the corporate market, deposits grew in the past 12 months by NOK 400 million (NOK 728 million), or 3.8% (7.4%).

## DEPOSITS FROM CUSTOMERS

By the end of the year, customer deposits amounted to NOK 25 068 million. In the past 12 months, deposits decreased by NOK 385 million (NOK -446 million), or 1.6% (-1.8%). The Group has a high deposit-to-loan ratio, with 88.7% (91.9%) consisting of deposits from customers in Helgeland. Of the total deposits of NOK 25 068 million, NOK 16 403 million, or NOK 65.4% (61.7%) were from retail customers. The 12-month growth

in the retail market was NOK 1 166 million (NOK 745 million), or NOK 7.7% (5.1%). In the corporate market, deposits fell by NOK -781 million (NOK 1 191 million), or -8.3% (-11.2%).

The deposit-to-loan ratio as a percentage of gross lending including transferred loans was 62.4% (65.0%) as at 31.12.24.

## FINANCING

Deposits from customers represent an important source of financing. The Group is also financed via the Norwegian monetary and securities market. At year end, total capital market financing amounted to NOK 7 879 million (NOK 6 099 million), and has a satisfactory distribution as regards maturity and borrowing sources. At the end of the year, the proportion of borrowing with a duration of more than one year was 86.3% (78.1%). As of 31.12.24, the duration of the borrowing portfolio was 3.17 years (2.20 years).

The Bank continually facilitates the transfer of approved mortgages to the mortgage credit institutions. At the end of the year, the Bank has transferred NOK 8 555 million to SpareBank 1 Boligkreditt, and NOK 4 093 million to the wholly owned subsidiary Helgeland Boligkreditt. Collectively, this amounts to NOK 12 648 million, representing a decrease of NOK 337 million compared with the corresponding period last year. Loans transferred to Helgeland Boligkreditt are recognised in the Bank's consolidated financial statements, while transferred loans to SpareBank 1 Boligkreditt are not consolidated.

The internal maximum limit set for the transfer of loans to mortgage companies is currently 40% of gross lending and 55% of gross lending in the retail market. As at 31.12.24, the transfer ratios were 31.5% (34.2%) and 43.3% (47.4%), respectively.

## RATING

SpareBank 1 Helgeland is rated by Moody's as A2 with a "stable outlook". Bonds issued by Helgeland Boligkreditt AS are rated by Moody's as Aaa. Moody's has awarded the Bank an ESG rating of CIS-2 (neutral to low), which corresponds to the ESG risk not affecting Moody's assessment of the Bank in a positive or negative direction.

## EQUITY CERTIFICATES - HELG

As of the end of the year, there were 3 095 equity certificate holders. The 20 largest owners are listed with 80.8% of the equity share capital. Of this, Sparebankstiftelsen Helgeland owns 28.11% and SpareBank 1 Nord-Norge 19.99%. A total of 27 000 130 equity certificates have been issued. As at 31.12.24, the Bank owned 94 596 treasury equity certificates. At the end of the year, the Bank's equity certificates were trading at NOK 144.50. This represents an increase of NOK 14.50, or 11.1%, from 31.12.23.

## DIVIDEND POLICY

SpareBank 1 Helgeland's goal is to manage the Group's resources in a way that gives the equity owners a satisfactory combined yield in the form of dividends and added value.

The surplus will be divided equally between equity share capital and primary capital in accordance with their share of the Bank's equity. The Group aims to distribute 50% or more of the equity capital share of the surplus in the form of dividends, and to correspondingly distribute the same share of the primary capital share as dividends in the form of gifts to charitable causes. The remainder of the profit will be transferred to the equalisation fund and primary capital.

The Group's capital adequacy and the opportunities for future profitable growth will be afforded emphasis when the dividend level is determined.

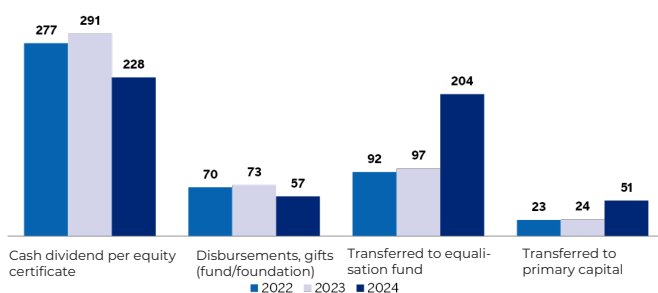
## PROFIT ALLOCATION

The Parent bank's net profit amounted to NOK 569 million. Adjusted for the change in the fund for unrealised gains and interest on subordinated bonds, the dividend basis amounted to NOK 540 million.

Given the high growth in 2024, a desire to increase indirect ownership in SpareBank 1 Gruppen and expected lending growth in 2025, the Board of Directors believes a larger share of this year's profit needs to be retained. Given the above assessments, the Board is recommending a dividend ratio of 52.75% of the dividend basis. This will entail the following distribution of the profit for 2024.

- NOK 228 million as a cash dividend, corresponding to NOK 8.40 per equity certificate
- NOK 57 million for good causes
- NOK 204 million to the equalisation fund corresponding to NOK 3.60 per equity certificate
- NOK 51 million to the primary capital fund

Disponering resultat (mill.kr.)



As a percentage of the Group's net income for 2024, the dividend corresponds to a dividend payout ratio of 50%.

Dividends are paid to the equity certificate holders who are registered as owners as at 26.03.25. The Bank's equity certificates are listed ex-dividend on 27.03.25.

## RISK AND CAPITAL MANAGEMENT

Risk and capital management supports the Group's strategy and ambitions, and is intended to ensure that the Group's financial and operational

objectives lie within the enterprise's risk tolerance. Nevertheless, unforeseen losses can occur which require the Group to have sufficient equity. As a part of the risk management process, the requirement for supplementary capital for the various risk areas is evaluated. These assessments are underpinned by computational models. This is summarised in the Group's internal process for assessing capital requirements (ICAAP).

### Risk categories and definitions:

**Credit risk:** Credit risk is defined as the risk of losses as a result of customers or counterparties being unable or unwilling to fulfil their obligations and climate risk.

**Liquidity risk:** The risk of the Group being unable to meet its obligations at maturity.

**Market risk:** The risk of losses due to changes in market prices linked to activities and positions in securities (interest and shares) and currency.

**Operational risk:** The risk of losses due to failures in internal routines, systems and processes, insufficient competency, damage to assets, suspension of operations, system failure, cyber risk and internal or external fraud.

**Compliance risk:** Risk of not complying with regulatory requirements and internal procedures/guidelines

**Anti-money laundering risk:** Risk of not complying with anti-money laundering and anti-terrorist financing laws and regulations, or not complying with internal regulations with the intention of fulfilling the requirements of the law.

Risk management is pivotal to the day-to-day operation and the ongoing work of the Board. Risk is primarily managed through risk and capital strategy, the corporate governance policy, the risk management policy and internal control, the operational risk policy, periodic assessment and reporting of operational risk, periodic measurement and reporting of established management goals in all business areas, guidelines, frameworks, authorities, disclosure requirements and competency requirements. The Board determines the Group's credit policy, which covers credit risk, and the Group's finance policy, which covers liquidity risk and market risk. The Bank has a Credit Committee and Finance Committee for the management and follow-up of risk in line with guidelines and authorities issued by the Board.

The Group's risk management unit comprises nine FTEs. The Risk Management Director reports directly to the CEO, and is responsible for monitoring and coordinating overarching risk management within the Bank. The Risk Management Director also reports directly to the Board.

The Group's internal audit has been outsourced to an external audit and consultancy firm, which reports to the Board of Directors. The internal

auditor is responsible for, for example, evaluating whether adequate routines are in place in key areas within the Group in order to reduce risk. The Board annually approves the internal auditor's instructions and schedule of work.

## CREDIT RISK

Credit risk is one of the Group's main operational risks.

Credit risk is managed via the risk and capital strategy, credit policy, credit standard and granting rules. In November 2024, the credit policy, credit standard and granting rules were evaluated and revised, with adjustments effective from 01.01.25. In particular, procedures and documentation prepared by the SpareBank 1 Alliance have been adapted. SpareBank 1 Helgeland uses an ESG module to map the ESG risk of individual corporate customers. The work on identifying and mapping ESG risks at our customers is a continuous job.

The Group's policy for the area of credit is derived from the overall risk and capital strategy and contains standards and management frameworks for risk profiles and risk concentrations. The management framework covers the allocation of lending between the retail and corporate markets, size of commitment and number thereof, exposure within sectors (concentration risk) and geographical limitations. This framework is monitored and reported quarterly to the Board of Directors, supplemented by annual portfolio reviews for the corporate market.

Developments in credit risk are monitored through regular analyses of the trend in defaults in specific sectors, geographical areas, borrowers' ability to service interest and instalments, and an assessment of the collateral that underlies the credit commitments. Through internal controls, more actions are also being implemented to monitor and follow-up borrowers. Credit risk is one of several focus areas for the Bank's Board of Directors, and throughout 2024, several measures were implemented and carried forward into 2025 to ensure that credit risk is kept at a satisfactory level. These included measures to reduce defaulted and doubtful commitments to the levels in comparable banks.

The total capital requirement for credit risk is stated in the Group's ICAAP. The level of tolerance for credit risk is defined for selected sectors and areas. A management level for the corporate market portfolio has been established and is followed and reported periodically. Stress tests are used to assess the loss potential in the credit portfolio as a result of a large fall in property prices.

The risk in the retail market portfolio has been low over time. Demand for homes declined in 2024 and house prices dropped as a result of higher inflation and thus higher mortgage interest rates. The number of new builds was significantly lower for the same reasons. The whole of Helgeland generally experienced a hesitant housing market.

The risk in the corporate market portfolio is moderate. The level of defaulted and doubtful commitments is considered moderate and the trend was stable throughout 2024. Gross lending to the corporate market increased in 2024 by NOK 400 million, or 3.8%. The Group has a small portfolio of guaranteed foreign currency loans. As of 31.12.24, the equivalent value was NOK 44 million. The portfolio is divided into a small number of customers who have pledged collateral in the form of property and/or deposits.

In 2024, the Group continued its annual validation of the model for calculating Group write-downs based on score models similar to those used by the SpareBank 1 Alliance. The model is based on the probability of default and loss level assuming that a commitment is defaulted upon.

In 2024, booked impairments on loans amounted to NOK 102 million, compared with NOK 100 million in 2023. The impairments are considered high and amounted to 0.26% (0.27%) of gross lending, including transferred loans.

Total net defaulted (more than 90 days past due) and doubtful commitments amounted to NOK 399 million, equivalent to 1.3% of gross lending compared with NOK 390 million (1.3%) in 2023. Commitments are monitored on an ongoing basis with a view to identifying possible doubtful commitments through specific watch lists. Compliance with the framework and procedures in individual cases is ensured through the Credit Committee, key controls performed by managers, and the delegation of tasks between advisors and credit support. For the corporate market, management and monitoring are ensured through the ongoing assessment of customer relationships, ability to pay, and collateral assessments. This is done through both monthly and quarterly reviews. For monitoring and development in the retail market portfolio, quarterly analyses are carried out concerning the quality of new approved loans, along with six-monthly analyses of the overall portfolio. There is a strong focus on this area and regular reviews are carried out of the quality of the work relating to credit. This includes an understanding of good monitoring and the control of customer portfolios.

The loan portfolio, broken down according to low, medium and high risk, is reported on the basis of the score models. Risk migration is reported quarterly as part of the overall reporting of risk to the Board.

## LIQUIDITY RISK

The Group shall at all times have sufficient liquidity to meet its liabilities when they fall due, and have a liquidity policy that helps to secure access to sufficient long-term financing. The Group makes use of the usual funding sources in the market to optimise a diversified funding structure. The Board has established a liquidity management policy, which specifies the purpose, management objectives and risk tolerance for liquidity risk



management. The primary purpose of the policy is to ensure that the Group has appropriate liquidity management in place. The liquidity policy is reviewed by the Board every year.

The Bank's liquidity reserve mainly consists of interest-bearing securities issued by solid issuers. The Bank satisfies the liquidity coverage ratio/net stable funding ratio (LCR/NSFR) in accordance with the applicable regulatory requirements by a good margin. Monitoring and measuring of the liquidity situation is based on various stress test scenarios which take into account both market-specific and bank-specific events. The Group had an LCR of 133% (132%) at year end. NSFR ended the year at 135% (136%).

Collateral in the Bank's assets (bonds) has been pledged for borrowing in Norges Bank totalling NOK 599 million (NOK 574 million), which was totally unused at year end.

Liquidity risk is reduced by spreading borrowing over various markets, lenders, instruments and maturities. Management of the Group's liquidity risk is based on the targets for long-term funding ratio, deposit-to-loan ratio and liquidity buffer capital, in addition to regulatory requirements regarding LCR and NSFR. The Board has also stipulated that long-term borrowing must amount to at least 70% of total borrowing. The proportion of long-term funding remained well within the framework throughout 2024.

The Group has liquidity reserves in the form of cash, deposits in Norges Bank and other banks, interest-bearing securities, and well as unused drawing rights. Minimum requirements for liquidity reserves are stipulated in the Bank's liquidity policy. The Group's total liquidity reserves (cash, bank deposits and interest-bearing securities) amounted to NOK 5.6 billion (NOK 6.1 billion), or 14.3% (16.5%) of the Group's total assets. The total duration of the fixed income portfolio is 1.35 years (1.74 years).

The deposit-to-loan ratio is an important parameter in the monitoring of liquidity risk. The deposit-to-loan ratio is the proportion of lending to customers which is covered by deposits from customers. The Board has set a target number for the deposit-to-loan ratio of 60% including transferred loans to mortgage credit institutions. This target was met throughout 2024, and at the end of the year it was 62.4%.

## MARKET RISK

The Group's overall market risk primarily consists of share, interest, currency, property, credit spread and owner risk.

The Board of Directors has adopted a risk and capital strategy and finance policy that define the Group's overall objectives and risk tolerance and establish a framework for market risk. Through the financial policy, the Board sets specific limits for interest rate, credit spread and share price risk. The policy is revised every year. The Group has no active

trading portfolios within interest, shares or foreign exchange.

The Group's liquidity reserves consist of interest-bearing securities (bonds and certificates) with low risk and good liquidity. Some 69% of the investments are made in AAA-rated bonds issued by mortgage credit institutions (covered bonds), municipalities and the state. Some 98% of the portfolio is invested in bonds rated at least AA. The securities are primarily based on a FRN (Floating Rate Note) structure and are therefore associated with low interest rate risk.

Duration in the liquidity portfolio must be a maximum of 2.5 years. An authority framework ensures good diversification and limits counterparty risk. The Group's lending to customers and deposits from customers are primarily based on floating interest rates, as is the Bank's liquidity portfolio. The borrowing portfolio consists of FRN-based loans, and loans at fixed interest rates. The interest rate risk on fixed interest loans is limited through the use of interest swap agreements.

The Group assumes credit spread risk, primarily through the management of interest-bearing assets in the liquidity portfolio. The portfolio mainly consists of assets issued by Norwegian banks, mortgage credit institutions, municipalities, governments and non-financial institutions. The credit spread risk lies within the Board's agreed limits.

The overarching interest rate risk is maintained within the target range by an overall management of balance sheet items and the use of interest rate swaps. Interest rate risk is at a low level.

The Group has a relatively conservative policy for investments in interest-bearing securities, where the main objective is to secure an adequate liquidity buffer. There are specific requirements regarding issuers' ratings. There is also a maximum limit on duration for the interest-bearing securities portfolio, and this must be diversified between different sectors and types of issuer.

At year end, the Group's shareholdings are mainly strategically motivated through investments in subsidiaries, associated companies and product companies. The market risk linked to such equity investments is considered to be moderate. The Group has no active property management or exposure in property, other than properties which are linked to the business and any repossessed properties for disposal.

## CURRENCY RISK

SpareBank 1 Helgeland is not a foreign exchange bank, and the Group has no active foreign exchange portfolios other than its euro stock in ATMs and guaranteed foreign currency loans. The Group's foreign exchange risk is insignificant.

## OPERATIONAL RISK

Good internal controls and quality assurance are essential for the satisfactory management of operational risk. The governance documents and control systems have been built up to safeguard efficient operation, risk control, prudence, accurate financial and non-financial information, compliance with laws and guidelines.

Risk evaluations are conducted at all levels. Risk evaluations are documented and give an overview of processes and key controls in the operational functions. A focus on the systems and processes in the operational functions contributes to a constant focus on quality and efficiency, as well as target-oriented operation within the Group.

Operational risk is measured through the evaluation of operational events assigned to defined loss event categories for random events, and in connection with summarised non-conformities identified through routine checks. Operational risk is quantified by calculating the capital requirement for operational risk. This is summarised in a requirement to hold sufficient capital as collateral for future expected losses to which the Group could be exposed as a result of operational risk.

Assessed on the basis of the organisation's competency, organisation and delegation of responsibilities, and the Group's earnings and solvency, the Board considers the overall risk exposure to be appropriate.

### ESG RISK

ESG risk is the risk of loss arising from actual or potential impacts from ESG factors that impact the Group's core business. This could be through either counterparties or investments. ESG risk materialises through traditional categories of financial risk (credit risk, market risk, operational risk, reputational risk and liquidity and funding risk).

The Group's work on mitigating ESG risk is based on the sustainability strategy and corporate social responsibility and sustainability policy adopted by the Board of Directors. ESG risk has also been integrated into other governance documents, methods and standards divided into the risk categories mentioned. A double materiality assessment was conducted in compliance with the CSRD to identify material sustainability topics. This identifies the areas where the Bank has the greatest impact on its surroundings, and the risks and opportunities that ESG matters entail.

The work on the sustainability strategy is embedded among employees, the Management Group and the Board of Directors. The Group wants to be a clear driving force behind sustainable growth, skills and collaboration in Helgeland. The employees' skills and sense of ownership are clearly the most important success factors if the Group is to achieve its goals.

The Group started a skills development programme in 2023 with relevant courses for

employees and employee-elected representatives. We are currently about to introduce a new product framework and transition plan for net zero emissions in our own activities, and in the customer portfolio there will be a greater focus on ESG advice for customers. The aim is to help improve the energy efficiency of homes and help our corporate customers navigate the green transition.

Making the data sources and ESG stress tests available ensure that they will be taken account of in the further work on quantification and developing the reporting on ESG risk in the ICAAP and on IFRS9 loss provisions.

The SpareBank 1 Alliance continuously strives to make relevant ESG data available, and the Bank developed a specific stress test for physical climate risk in 2023. As at year end 2024, the Bank had started work on developing a model for also quantifying transition risk, initially for properties (residential and commercial properties).

### COMPLIANCE

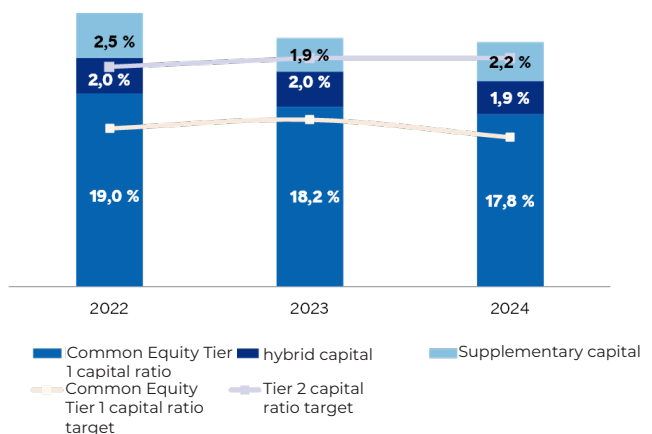
The Board of Directors attaches decisive importance to ensuring that operations are aligned with applicable laws and regulations, policies and that internal rules and guidelines are followed. Particular attention is paid to stricter regulatory requirements.

### SOLVENCY RATIO

Following proportionate consolidation, at the end of 2024, net subordinated capital amounted to NOK 5 234 million, of which subordinated bonds amounted to NOK 398 million and subordinated loans NOK 450 million.

As of 31.12.24, the Group had a Common Equity Tier 1 capital ratio of 17.8% (18.2%). The total capital adequacy amounted to 21.9% (22.1%) Net income at the year-end is included in Common Equity Tier 1 capital, less the proposed dividend classified as equity.

Change in capital adequacy in %



The statutory minimum requirement for Common Equity Tier 1 capital ratio is 14.0%. The Group has a Pillar 2 supplement of 2.2%. The Group's

requirement regarding Common Equity Tier 1 capital, including the Pillar 2 supplement, thus amounts to 15.2% (14.2%).

The target figures for Common Equity Tier 1 ratio and total capital adequacy 1.3 percentage points above the regulatory requirements, which currently amount to 16.5% and 21.0%, respectively. Surplus capital is used for future growth, or alternatively distributed to the owners through higher dividends and increased donations. SpareBank 1 Helgeland uses the standard method in its capital adequacy calculations. At year end, the Group's leverage ratio, following proportionate consolidation, amounted to 9.2% (9.1%). The minimum requirement for non-systemically important banks is 5%.

## SUBSIDIARIES

### Helgeland Boligkreditt AS (100%)

Profit after tax for 2024 amounted to NOK 23.5 million (NOK 22.2 million), and equity as at 31.12.24 was NOK 571 million (NOK 570 million).

### AS Sparebankbygg (100%)

Profit after tax for 2024 amounted to NOK 0.5 million (NOK 0.5 million), and equity at the end of the year was NOK 2.4 million (NOK 1.8 million).

### Helgeland Sparebanks

#### Eiendomsselskap AS (100%)

Profit after tax for 2024 amounted to NOK 1.3 million (NOK 1.4 million), and equity at the end of the year was NOK 12.1 million (NOK 10.8 million).

### Bankbygg Mo AS (99.9%)

Result after tax for 2024 amounted to NOK -2.8 million (NOK -5.8 million), and equity at the end of the year was NOK 76.8 million (NOK 79.6 million)

### Storgt. 73 AS (100%)

The profit after tax for 2024 was NOK 1.4 million (NOK 1.1 million) and equity was NOK 7.4 million (NOK 5.9 million).

## INSURANCE

Insurance has been taken out for the board members and the CEO to cover any potential liability to the institution and third parties. The insurance covers capital losses due to claims made during the insurance period as a result of an alleged act or omission that results in liability.

## THE GROUP'S REMUNERATION POLICY

All remuneration agreements in SpareBank 1 Helgeland are drawn up in line with the Financial Services Act and the Securities Trading Act and associated regulations concerning the remuneration schemes of financial institutions, asset management firms and securities funds. The standards for SpareBank 1 Helgeland's remuneration scheme were last updated and approved by the Board in December 2024.

Remuneration reports and the standard for determining and adjusting the remuneration of executive personnel are published as separate documents on the Bank's website.

## EVENTS AFTER THE BALANCE SHEET DATE

No events of importance to the financial statements have occurred since the balance sheet date.

## OUTLOOK

At the beginning of 2025, we can look back on a year characterised by war and geopolitical turmoil, a weak Norwegian krone, high interest rates and relatively high inflation. The expected stabilisation of inflation, real wage growth and interest rate reductions will improve economic conditions for households and businesses. Nevertheless, a continued weak Norwegian krone, stable inflation and economic growth are resulting in uncertainty about by how much, and not least when, interest rates will be cut.

Despite the challenging economic times, Helgeland remains a very ambitious region, and the Bank believes that what is happening here will further confirm that Helgeland is a forward-thinking industrial and aquaculture region, tourist destination, and, not least, a key contributor to sustainable development. The progress on establishing onshore aquaculture facilities along both the north and south of the Helgeland coast and major infrastructure and industrial projects, such as an airport, deepwater harbour and residential and road developments, will result in significant investments in Helgeland. Although the macroeconomic picture is creating uncertainty about both the magnitude and timing of a number of the investments, several of the projects are now starting to be realised. The Bank is well positioned to be an important contributor to the local businesses who are expected to be impacted by this development. This impact is expected to come in the form of direct contributions into projects or from taking advantage of the positive ripple effects the investments produce.

In the retail market, the Board expects market growth, like credit growth, to pick up in the near future. Nevertheless, the Board will continue to prioritise profitable growth in the retail market. In the longer term, high levels of activity are expected in the region, which gives grounds for optimism relating to long-term growth in the retail market as well.

For the corporate market, high interest rates and a high level of costs have resulted in challenges for exposed companies. The Bank has seen an increase in bankruptcies among smaller companies and companies within building and construction and property development. In the opinion of the Bank, there are no indications of a significant deterioration in the credit quality in other parts of the loan portfolio. The Bank believes that 2025 will see a decrease in losses on loans compared with the levels seen in 2023 and 2024.

The Bank's long-term target for returns is on a par with that of comparable banks and is currently 12%. As far as the loan and deposit portfolios are concerned, including loans transferred to the mortgage credit institution, the Bank is

experiencing strong competition on price, higher funding costs and associated price slippage. This, together with an expected decrease in policy rates, means that over the year we will probably see a reduction in net interest income.

The level of commission income is stable, although it is expected to decrease somewhat due to the loss of the returns on the portfolio of the former product company. Established pricing measures and a proactive sales organisation give reason to expect that the level minus the commission from mortgage credit institutions in 2024 will lie at around 0.35% of total assets.

The operating costs for basic operations are expected to remain relatively stable at their current levels, although they will be affected by higher depreciation related to the refurbishment of the Bank's head office. However, the cost/income ratio is expected to be well within the Bank's target figure: costs in relation to income of less than 40%.

Helgeland has great potential and give the Board of Directors great faith in the future. SpareBank 1 Helgeland wants to be a key contributor to growth in the region.



Board of Directors for SpareBank 1 Helgeland

Mo i Rana, 27.02. 2025

Bjørn Krane  
*Chair*

Siw Moxnes  
*Vice Chair*

Marianne Terese Steinmo  
*Board Member*

Geir Andreassen  
*Board Member*

Yngve Myhre  
*Board Member*

Ann-Helen Baadstrand  
*Board Member*

Kenneth Normann  
*Employee-elected board member*

Solrun Johansen  
*Employee-elected board member*

Hanne Nordgaard  
*Chief Executive Officer*

# Implementation And Reporting On Corporate Governance

The Group's risk and capital strategy is intended to ensure that the Group's corporate governance is in line with generally recognised interpretations, standards and guides, as well as applicable laws and regulations. The strategy sets out the values, objectives and overarching principles that the Group is governed and controlled by in order to safeguard the interests of owners, depositors and other groups within the Group.

Governance documents for SpareBank 1 Helgeland's various business areas set out management objectives and frameworks in concrete terms. This includes, inter alia, the Bank's corporate social responsibility, articles of association, code of conduct, strategy document, policy documents, budgets, authorisations and frameworks, descriptions of procedures, insider rules and trading on own account. The operational risk policy, risk management and internal control policy and standards and processes for systems and processes highlight the assessment and internal control related to risk in the Group. SpareBank 1 Helgeland's roots are deeply anchored in Helgeland soil, and the Bank takes a keen interest in what is happening in the region. The Bank therefore has a vision of being a driving force for growth in Helgeland.

Because SpareBank 1 Helgeland is a solid and robust local bank with a strong market position, the Bank can contribute to the development of the local community. The legislator has given saving banks the opportunity to give a proportion of their profits back to the local community in the form of gifts and donations to non-profit causes. Saving banks can pay out dividends to the local community from the share of earnings from the component of equity that is owned by the customers and the community. Residential settlement and growth are prerequisites for the Banking sector. Without thriving and attractive local communities, it would be difficult to recruit labour in both the private and public sectors, which we need to do in order to promote local development. We therefore have a common destiny – the Bank and the people of Helgeland. SpareBank 1 Helgeland's gift fund forms part of the Bank's contribution to development, optimism and growth in both rural areas and towns alike in Helgeland.

In addition to the strategic and financial objectives, SpareBank 1 Helgeland has chosen to take its environmental responsibility seriously, and has therefore adopted its own environmental strategy. The governance documents are based, inter alia, on the Norwegian Code of Practice for Corporate Governance and the Committee of European Banking Supervisors' principles for overarching

governance and control. SpareBank 1 Helgeland's ambition is to follow the aforementioned recommendations insofar as they are applicable.

In line with the Norwegian Code of Practice for Corporate Governance, there follows an account of the Bank's compliance with the points in the recommendation.

## **BUSINESS**

SpareBank 1 Helgeland is a financial group consisting of the Parent bank and a number of subsidiaries. References to the Bank and/or SpareBank 1 Helgeland concern the SpareBank 1 Helgeland Group.

In accordance with SpareBank 1 Helgeland's articles of association, the object of the business is to promote savings by accepting deposits from an undefined group of depositors, provide investment services and other financial services, and securely manage the funds for which it is responsible in accordance with applicable legislation concerning savings banks at all times. The Bank can carry out all transactions and provide all services that are customary or natural for savings banks to perform in accordance with the relevant licences and applicable legislation.

The report from the Board contains a description of the Group's objectives and strategies. SpareBank 1 Helgeland has a three-year strategic period, with annual reviews. The Board and management evaluate the strategic basis at least annually. The Group's plans are adjusted and adapted on an ongoing basis. The Group's strategic platform is summarised under the following key points: vision, business idea, core values, strategic and financial objectives and code of conduct.

SpareBank 1 Helgeland is a customer-oriented organisation with a focus on the retail market, corporate market and capital market as business areas. This is supplemented by supporting areas and staff functions. The Group's organisational structure is dynamic and is at all times assessed on the basis of current needs and framework conditions.

## **EQUITY CERTIFICATE CAPITAL AND DIVIDENDS**

The Bank's equity is composed of equity certificate capital, share premium reserve, primary capital, fund for unrealised gains, gift fund, equalisation fund, subordinated bonds and other equity.

The Group's objective for Common Equity Tier 1 capital ratio is a minimum of 16.5% and total capital adequacy of over 21.0%.

## THE BANK'S DIVIDEND POLICY

SpareBank 1 Helgeland's goal is to manage the Group's resources in a way that gives the equity owners a satisfactory combined yield in the form of dividends and added value.

The surplus will be divided equally between equity share capital and primary capital in accordance with their share of the Bank's equity. The goal for annual dividends is to ensure that half or more of the profits is distributed in the form of dividends and gifts to charitable purposes. It is also a goal that the two owner groups be treated equally. The remainder of the profit will be transferred to the equalisation fund and primary capital.

The Group's capital adequacy and the opportunities for future profitable growth will be afforded emphasis when the dividend level is determined.

## EQUAL TREATMENT OF EQUITY CERTIFICATE HOLDERS

Equity certificate holders shall have predictable conditions with regard to equal treatment, return and management influence.

The listing of the equity certificates ensures that the Bank accepts and follows the market conditions that apply at all times in the equity market and to equity certificates.

## EQUITY CERTIFICATES AND NEGOTIABILITY

The articles of association do not contain any limitations on the negotiability of equity certificates.

The Sparebankstiftelsen Helgeland foundation owns equity certificates in SpareBank 1 Helgeland. According to the articles of association, the foundation cannot own less than 25% of the equity certificates in SpareBank 1 Helgeland.

Beyond this, the only limitation is the statutory requirement which currently stipulates that the acquisition of equity (10% or more) requires the consent of the Financial Supervisory Authority of Norway.

## SUPERVISORY BOARD

The Bank's supreme body is the Supervisory Board and is composed of the holders of equity certificates, customers and employees. The Supervisory Board is responsible for ensuring that the Bank acts in accordance with its purpose and in compliance with law and the articles of association. The Supervisory Board elects the Bank's Board of Directors.

The Supervisory Board has 25 members and 25 deputy members. Decisions are made by simple majority. However, decisions regarding amendments to the articles of association require a two thirds majority of those present, and at least 50% of the Supervisory Board's members must vote for the proposal. Elections take place in accordance with applicable savings bank legislation and the

provisions of the Financial Institutions Act. Notices of meetings and minutes of meetings of the Supervisory Board are sent to Oslo Stock Exchange.

Elections to the Supervisory Board take place through election meetings and on election day(s). All elections must be held by the end of April, and before the statutory general meeting of the Supervisory Board. Invitations to equity certificate holder elections are sent to all equity certificate holders fourteen days before the election, which is conducted electronically. Information on the election is also provided on the Bank's website and via Oslo Stock Exchange.

The election of depositors is announced through electronic notices on screens on the Bank's premises and on the Bank's website 2 weeks prior to the election. The election itself is conducted electronically.

## NOMINATION COMMITTEE

The Bank's Nomination committee prepares:

- Elections that are held by the Supervisory Board
- Elections of equity certificate holders to the Supervisory Board
- Elections of depositors to the Supervisory Board

The Supervisory Board's Nomination Committee also proposes fee scales. The Bank's website contains information on the members of the Nomination Committee.

## BOARD OF DIRECTORS: COMPOSITION AND INDEPENDENCE

SpareBank 1 Helgeland's Nomination Committee proposes candidates for the Board in line with the applicable provisions in law and the articles of association. No member of the Board or representative of the management may be a member of the Nomination Committee. The Chair and Vice Chair of the Board are elected by the Supervisory Committee. The Board consists of between six and nine members and up to four deputy members. The Board currently consists of eight permanent members. Four of the permanent members are currently women. Important criteria regarding the Board's members and composition are qualifications, capacity, independence and gender balance. The majority of the Board's members must be independent of the Bank's management and key business contacts. The Board undertakes an annual review of its members' independence and the Board's collective competence. Everyone who is elected as a member must satisfy the requirements regarding suitability that follow from applicable legislation.

## THE WORK OF THE BOARD OF DIRECTORS

The Board holds meetings once a month on average and performs its work in accordance with a plan which is drawn up for the year. In addition to the elected members, the Bank's CEO and board

coordinator attend at Board meetings. The Board has overall responsibility for the management of SpareBank 1 Helgeland and for supervising the day-to-day management and activities of the Bank.

The Board's responsibility for administration includes responsibility for organising the Bank in a proper manner, for establishing plans and budgets for the Bank, for keeping itself informed about the Bank's financial position and for ensuring that the Bank's activities, asset management and accounts are subject to satisfactory controls. The annual strategy process with roll-out of the strategy plan is a priority. Overall goals and strategies are established, and action plans and budgets are then prepared on the basis of these. The CEO prepares matters which are to be considered by the Board in co-operation with the chair of the Board. A total 15 board meetings were held at the Bank in 2024. Development of the Bank's strategy, structural changes, risk and capital management, along with profitability, have been among the Board's main focus areas. The Board has prepared an annual plan for its work. Emphasis is placed on ensuring that the Board's members possess sufficient knowledge and expertise. A self-evaluation has been conducted covering working forms, expertise, priorities and collaboration between the Board and the management.

As part of the Board's work, it has set up an Audit Committee, a Risk Committee and a Remuneration Committee. These committees are inter alia intended to ensure that SpareBank 1 Helgeland has an independent and effective internal and external audit, and that accounting and risk reporting are in line with rules and regulations, and help to promote and incentivise good corporate governance with regard to the enterprise's risks, counteract high risk taking and help to prevent conflicts of interest.

The members of the Risk Committee are Geir Andreassen. (chair), Bjørn Andreas Krane and Siw Moxness. The Risk Committee held nine meetings during 2024.

The members of the Remuneration Committee are Marianne Terese Steinmo (Chair), Bjørn Andreas Krane and Kenneth Normann (employee representative). The Remuneration Committee held five meetings during 2024.

The members of the Audit Committee are Siw Moxness (Chair), Bjørn Andreas Krane and Geir Andreassen. 8 meetings were held in 2024.

## **RISK MANAGEMENT AND INTERNAL CONTROL**

Good risk and capital management is key to SpareBank 1 Helgeland's long-term value creation. Risks relevant for the Bank's achievement of objectives must be identified, managed, monitored and reported through effective risk management. SpareBank 1 Helgeland aims to ensure that the Bank's risk profile is moderate.

**Risk management is linked to the key areas:**

- Credit
- Market
- Liquidity
- Operational risks, including HSE, IT, communication, market, compliance
- ESG risk and anti-money laundering (AML) and terrorist financing.

The choice of risk assessment method must take into account the Bank's complexity and scope in the various business areas. The Board of SpareBank 1 Helgeland requires the Bank to be well-capitalised. Capital assessments (ICAAP) and quantifications are undertaken once a year. The Bank's risk and capital strategy shall be based on actual risk in the activity, supplemented by the effects of different stress scenarios.

Responsibility for implementing the Bank's risk and capital management and controls is split between the Board, the management and the operational units. The Board is responsible for ensuring that the Bank has sufficient capital based on the desired level of risk and the Bank's operations. The CEO is responsible for overarching risk management at the Bank, including the development of good models and a framework for management and control. The Corporate Market Director chairs the Bank's Credit Committee, which ensures that the approval of credit matters remains within the powers granted by the Board. The CEO is a permanent member of the Credit Committee. The Chief Financial Officer chairs the Bank's Finance Committee, which discusses borrowing and other relevant topics within the powers granted by the Board.

The Bank's management includes the position of Risk Management Director. The Risk Management Director reports to the CEO. In certain defined cases, the Risk Management Director reports directly to the Board.

The Risk Management Department performs functions such as anti-money laundering and anti-terrorist financing, governance, control and reporting. Evaluation of capital requirements linked to risk in the Bank's various business areas represents an integral part of the Board's strategic work and assessment of risk areas (the ICAAP process).

All managers at SpareBank 1 Helgeland are responsible for managing risk and ensuring that appropriate internal controls are in place within their own discipline and/or area of responsibility, in line with the Bank's risk framework. SpareBank 1 Helgeland has adopted a risk and capital strategy, corporate governance policy and operational risk policy. These govern the Group's objectives, organisation and performance of internal control work. Also included in this is a requirement for



reporting the status of the Bank's risk picture, the quality of internal controls both generally and within the compliance areas of anti-money laundering and terrorist financing, and GDPR in particular. In addition, recorded incidents and the follow-up of risk-mitigation measures are reported.

The Bank has outsourced the internal audit function to an audit and consultancy firm which, on behalf of the Board, assesses and confirms that satisfactory procedures have been established for monitoring and reducing risk. The internal auditor's controls are based on an annual audit plan that is approved by the Board of Directors. The Bank's code of conduct impose a duty on employees to report any breaches of internal guidelines, laws and regulations and the procedures for such reporting.

## **REMUNERATION OF THE BOARD OF DIRECTORS**

The Supervisory Board sets the Bank's fees.

The remuneration paid to the Board reflects the Board's responsibilities, competence, time spent and complexity. The remuneration paid to each board member is set out in the remuneration report, which is published on the Bank's website.

## **REMUNERATION OF EXECUTIVE PERSONNEL**

The Board sets the remuneration to the CEO and the principles for remuneration to senior executives. As at 31.12.24, the Bank had no option or bonus agreements. The CEO has contractually agreed severance pay. The institution's

remuneration report provides an overview of salaries and benefits to senior executives. The Bank has established standards for ensuring compliance with regulations concerning the remuneration schemes of financial institutions, investment firms and management companies for securities funds. Reference is also made to the Bank's website, on which both standards and remuneration reports are published.

## **INFORMATION AND COMMUNICATION**

SpareBank 1 Helgeland is listed on Oslo Stock Exchange and reports dates for important events such as election meetings, meetings of the Supervisory Board, and the publication of financial information in the form of interim reports and annual reports and accounts.

Information to the market is communicated through open investor presentations in the first, third and fourth quarterly accounting reports, as well as stock exchange notices and press releases. The same information is published on the Bank's website.

## **TAKE-OVERS**

The Finance Institutions Act imposes limits on the proportion of equity certificates that can be held by a single owner. Issues concerning mergers are decided by the Supervisory Boards of the savings banks concerned.

## **AUDITOR**

The Supervisory Board has elected PricewaterhouseCoopers as external auditor and approves the auditor's fees.

## INCOME STATEMENT

PARENT BANK		INCOME STATEMENT		GROUP	
2023	2024	(amounts in NOK millions)		2024	2023
1 553	1 837	Interest income, effective interest rate method		2 026	1 735
258	267	Other interest income		272	262
832	1 104	Interest expenses		1 271	993
17	15	Guarantee fund fee		15	19
962	985	Net interest and credit commission income (Note 5)		1 012	985
171	191	Commission income and income from banking services (Note 6)		191	171
16	16	Commission expenses and costs attributable to banking services (Note 7)		16	16
11	9	Other operating income (Note 9)		8	9
167	184	Net commission income and other operating income (Note 4)		183	164
57	64	Dividends		43	28
-1	22	Net income from joint arrangements		22	-1
-15	12	Net income from financial instruments		12	-12
41	98	Net income from financial instruments (Note 8)		77	15
185	200	Personnel costs (Notes 10-14)		201	186
230	232	Other operating costs (Notes 10-14)		226	228
415	432	Total operating costs before losses on loans, guarantees, etc.		427	414
755	836	Net income before loss		845	750
101	101	Losses on loans, guarantees, etc. (Note 16)		102	100
654	734	Net income before tax		743	650
154	165	Tax (Note 17)		172	160
500	569	Net income for the financial year		571	490
21	22	Hybrid capital owners' share of net income for the period		22	21
383	437	Equity certificate holders' share of net income for the period		439	374
96	110	Primary capital's share of net income for the period		110	94
0	0	Non-controlling owner interests' share of net income for the period		0	0
500	569	Net income for the financial year		571	490
14.2	16.2	Earnings per equity certificate in NOK (Note 18)		16.2	13.9
14.2	16.2	Diluted earnings per equity certificate in NOK (Note 18)		16.2	13.9
		Total comprehensive income			
500	569	Profit for the year after tax		571	490
		Items not to be reclassified via the income statement:			
-1	1	Recognised estimate variances, pensions		1	-1
		Items not to be subsequently reversed via the income statement:			
0	-2	Net change in fair value		-2	0
0	0	Tax on comprehensive income		0	0
-1	-1	Net other comprehensive income items		-1	-1
499	568	Total comprehensive income for the period		570	489

## BALANCE SHEET

PARENT BANK		BALANCE SHEET	GROUP	
31.12.23	31.12.24	(amounts in NOK millions)	31.12.24	31.12.23
		<b>ASSETS</b>		
83	124	Cash and receivables from central banks (Notes 19, 22, 27, 33)	124	83
1 865	1 813	Loans to and receivables from credit institutions (Notes 20, 22)	1 340	842
24 954	27 403	Loans to and receivables from customers (Notes 2.1, 4, 21, 22)	31 343	29 203
64	30	Financial derivatives (Notes 22, 23)	30	64
5 866	5 391	Certificates, bonds and shares (Notes 2.2, 22, 24, 25)	5 541	6 113
142	198	Investments in jointly controlled companies (Note 27)	198	142
648	648	Investments in subsidiaries (Notes 26, 28)	0	0
83	73	Intangible assets (Note 31)	73	83
39	32	Tangible fixed assets (Note 30)	265	250
135	193	Other assets (Note 32)	59	80
<b>33 879</b>	<b>35 905</b>	<b>Total assets</b>	<b>38 973</b>	<b>36 860</b>
		<b>LIABILITIES AND EQUITY</b>		
316	414	Liabilities to credit institutions with agreed maturity (Notes 2.2, 22, 34)	2	320
25 156	25 080	Deposits from customers (Notes 2.2, 4, 22, 35)	25 068	24 683
2 661	4 320	Liabilities established through the issuing of securities (Notes 2.2, 22, 23, 36)	7 879	6 099
33	23	Financial derivatives (Notes 22 and 23)	92	81
331	418	Other liabilities (Notes 12, 37)	258	274
352	452	Subordinated loan capital (Note 39)	452	352
<b>28 850</b>	<b>30 707</b>	<b>Total liabilities</b>	<b>33 751</b>	<b>31 809</b>
		<b>Equity</b>		
266	258	Equity share capital (Note 41)	258	266
1 505	1 505	Share premium reserve	1 505	1 505
1 626	1 831	Equalisation fund	1 831	1 626
<b>3 397</b>	<b>3 594</b>	<b>Total equity share capital</b>	<b>3 594</b>	<b>3 397</b>
824	876	Primary capital	876	824
101	28	Gift fund and gift foundation	28	101
<b>925</b>	<b>904</b>	<b>Total primary capital</b>	<b>904</b>	<b>926</b>
18	22	Fund for unrealised gains	22	18
398	398	Subordinated bonds	398	398
291	279	Other equity (Note 40)	304	313
<b>5 029</b>	<b>5 197</b>	<b>Total equity excluding minority interest</b>	<b>5 222</b>	<b>5 051</b>
		Non-controlling interests	0	0
5 029	5 197	Total equity	5 222	5 051
<b>33 879</b>	<b>35 905</b>	<b>Total liabilities and equity</b>	<b>38 973</b>	<b>36 860</b>

Contingent liabilities off balance sheet (Note 42)

## CHANGE IN EQUITY

### GROUP

31.12.24

	Equity certi- ficate capital	Share fund	Own eq. cert.	Subor- dinated bonds	Fund for unreal. gains	Prima- ry fund	Gift funds	Equali- sation fund	Other EQU- ITY	Non- cont. inte- rests	Total
Equity as at 01.01.24	270	1 505	-4	398	18	824	31	1 626	383	0	5 051
Profit for the year				22	4	52	6	206	281		571
Other comprehen- sive income								-1			-1
<b>Total comprehen- sive income for the year</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>22</b>	<b>4</b>	<b>52</b>	<b>6</b>	<b>205</b>	<b>281</b>	<b>0</b>	<b>570</b>
Interest paid, subor- dinated bonds				-22							-22
Gifts distributed							-9				-9
Other changes			-8								-8
Transactions with owners											0
Dividends/interest paid									-361		-361
<b>Equity as at 31.12.24</b>	<b>270</b>	<b>1 505</b>	<b>-12</b>	<b>398</b>	<b>22</b>	<b>876</b>	<b>28</b>	<b>1 831</b>	<b>304</b>	<b>0</b>	<b>5 222</b>
Paid-up equity/re- tained earnings			1 763							3 459	5 222

The fund for unrealised gains includes unrealised added value shares amounting to NOK 27 million.

### GROUP

31.12.23

	Equity certi- ficate capital	Share fund	Own eq. cert.	Subor- dinated bonds	Fund for unreal. gains	Prima- ry fund	Gift funds	Equali- sation fund	Other EQU- ITY	Non- cont. inte- rests	Total
Equity as at 01.01.23	270	1 505	-2	398	27	802	32	1 535	316	3	4 936
Profit for the year				21	-7	24	4	97	351	0	490
Other comprehen- sive income						0		-1			-1
<b>Total comprehen- sive income for the year</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>21</b>	<b>-7</b>	<b>24</b>	<b>4</b>	<b>96</b>	<b>351</b>	<b>0</b>	<b>489</b>
Interest paid, subor- dinated bonds				-21							-21
Gifts distributed							-5				-5
Other changes			-2		-2	-1		-5	-6	-3	-19
Transactions with owners											
Dividends/interest paid									-329		-329
<b>Equity as at 31.12.23</b>	<b>270</b>	<b>1 505</b>	<b>-4</b>	<b>398</b>	<b>18</b>	<b>824</b>	<b>31</b>	<b>1 626</b>	<b>383</b>	<b>0</b>	<b>5 051</b>
Paid-up equity/re- tained earnings			1 771						3 281		5 051

The fund for unrealised gains includes unrealised added value shares amounting to NOK 16 million.



## CHANGE IN EQUITY

**PARENT  
BANK**

31.12.24

	Equity certi- ficate capital	Share fund	Own eq. cert.	Subor- dina- ted bonds	Fund for unreal. gains	Prima- ry fund	Gift funds	Equali- sation fund	Other EQU- ITY	Total
Equity as at 01.01.23	270	1 505	-4	398	18	824	31	1 626	361	5 029
Profit				22	4	52	6	206	280	569
Other comprehensive income for the year								-1		-1
<b>Total comprehensive income</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>-22</b>	<b>4</b>	<b>52</b>	<b>6</b>	<b>205</b>	<b>280</b>	<b>568</b>
Interest paid, subordina- ted bonds				-22						---
Gifts distributed							-9			-9
Other changes			-8							-8
Transactions with owners										0
Dividends/interest paid									-361	-361
<b>Equity as at 31.12.23</b>	<b>270</b>	<b>1 505</b>	<b>-12</b>	<b>398</b>	<b>22</b>	<b>876</b>	<b>28</b>	<b>1 831</b>	<b>279</b>	<b>5 197</b>
Paid-up equity/retained earnings			1 764						3 433	5 197

The fund for unrealised gains includes unrealised added value shares amounting to NOK 27 million.

**PARENT  
BANK**

31.12.23

	Equity certi- ficate capital	Share fund	Own eq. cert.	Subor- dina- ted bonds	Fund for unreal. gains	Prima- ry fund	Gift funds	Equali- sation fund	Other EQU- ITY	Total
Equity as at 01.01.23	270	1 505	-2	398	27	802	32	1 535	329	4 896
Profit				21	-7	24	4	97	361	500
Other comprehensive income for the year						0		-1		-1
<b>Total comprehensive income</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>21</b>	<b>-7</b>	<b>24</b>	<b>4</b>	<b>96</b>	<b>361</b>	<b>498</b>
Interest paid, subordina- ted bonds				-21						-21
Issue							-5			-5
Gifts distributed			-2		-2	-1		-5		-10
Transactions with owners										
Dividends/interest paid									-329	-329
<b>Equity as at 31.12.23</b>	<b>270</b>	<b>1 505</b>	<b>-4</b>	<b>398</b>	<b>18</b>	<b>824</b>	<b>31</b>	<b>1 626</b>	<b>361</b>	<b>5 029</b>
Paid-up equity/retained earnings				1 771					3 258	5 029

The fund for unrealised gains includes unrealised added value shares amounting to NOK 16 million.

## CASH FLOW

PARENT BANK			GROUP	
31.12.23	31.12.24	(amounts in NOK million)	31.12.24	31.12.23
777	-2 504	Loans to customers	-2 196	1 552
1 507	1 757	Interest payments on loans to customers	2 014	1 738
-378	-77	Deposits from customers	385	-446
-671	-885	Interest payments on deposits from customers	-875	-664
-1 407	-1 485	Purchase of certificates and bonds	-1 485	-1 707
1 297	1 987	Sale of certificates and bonds	2 087	1 497
228	237	Interest payments on certificates and bonds	242	232
157	176	Commission payment	176	157
-360	-387	Payments to operations	-389	-383
-126	-125	Tax paid	-131	-134
12	20	Other accruals	9	26
<b>1 036</b>	<b>-1 286</b>	<b>A Net change in liquidity from operating activities</b>	<b>-163</b>	<b>1 868</b>
-17	-4	Investments in tangible fixed assets	-37	-64
0	0	Proceeds from sale of tangible fixed assets	0	0
-242	-151	Long-term investments in shares	-151	-242
0	34	Proceeds from sale of long-term investments in shares	34	0
74	64	Dividends from long-term investments in shares	42	46
<b>-185</b>	<b>-57</b>	<b>B Net change in liquidity, investment</b>	<b>-112</b>	<b>-260</b>
1 237	2 204	Take-up of liabilities established through the issuing of securities	5 011	3 127
-1 837	-538	Repayment - issued securities	-3 234	-4 635
-149	-194	Interest payments on liabilities established through the issuing of securities	-370	-320
0	100	Increase in subordinated capital	100	0
8	98	Receivables and liabilities to credit institutions	-318	8
-14	86	Interest on receivables and liabilities to credit institutions	29	-14
-23	-29	Interest payments on subordinated loans	-29	-23
-20	-24	Lease liabilities	-4	-5
-5	-9	Donations from the gift fund	-9	-5
-329	-361	Dividends to shareholders	-361	-329
<b>-1 132</b>	<b>1 333</b>	<b>C Net change in liquidity, financing</b>	<b>815</b>	<b>-2 196</b>
<b>-281</b>	<b>-10</b>	<b>A+B+C Net change in liquidity during period</b>	<b>540</b>	<b>-588</b>
2 229	1 947	Liquidity holding at start of period	924	1 513
1 948	1 937	Liquidity holding at end of period	1 464	924
		<b>Liquidity holdings specified</b>		
83	124	Cash and receivables, central banks	124	83
1 865	1 813	Receivables from credit institutions without notice period	1 340	842
<b>1 947</b>	<b>1 937</b>	<b>Liquidity holding</b>	<b>1 464</b>	<b>924</b>

Board of Directors for SpareBank 1 Helgeland

Mo i Rana, 27.02. 2025

Bjørn Krane  
*Chair*

Siw Moxness  
*Vice Chair*

Marianne Terese Steinmo  
*Board Member*

Geir Andreassen  
*Board Member*

Yngve Myhre  
*Board Member*

Ann-Helen Baadstrand  
*Board Member*

Kenneth Normann  
*Employee-elected board member*

Solrun Johansen  
*Employee-elected board member*

Hanne Nordgaard  
*Chief Executive Officer*

Documents are approved electronically

# Content Notes

Note 1.	Accounting policies	89
Note 1.1	Accounting estimates and discretionary assessments	96
Note 2.	Financial risk management	96
Note 2.1	Credit risk	97
Note 2.1.1	Loans and loss provisions	98
Note 2.1.2	Central banks and credit institutions	104
Note 2.1.3	Defaulted and doubtful commitments	105
Note 2.2	Liquidity risk	106
Note 2.2.1	Liquidity risk, remaining maturity	107
Note 2.3	Market risk	110
Note 2.3.1	Guarantee liability for foreign currency loans	111
Note 2.3.2	Interest rate risk, remaining time to interest rate adjustment	112
Note 3.	Sensitivity analysis for changes in market prices	114
Note 4.	Segment information	115
Note 5.	Net interest and credit commission income	116
Note 5.1	Interest on certain balance sheet items (average interest rate in %)	116
Note 5.2	Average volume of certain balance sheet items	117
Note 6.	Commission income and income from banking services	117
Note 7.	Commission expenses and costs attributable to banking services	117
Note 8.	Net income from financial assets and liabilities	117
Note 9.	Other operating income	118
Note 10.	Operating costs	118
Note 11.	Salaries and National Insurance costs	118
Note 12.	Pension liabilities and pension costs	118
Note 12.1	Liabilities and expenses concerning pension schemes	119
Note 12.2	Risks associated with changes in economic assumptions	119
Note 12.3	Economic assumptions	120
Note 12.4	Pension liabilities, defined benefit scheme	121
Note 12.5	Estimate variances, defined benefit scheme	121
Note 13.	Net pension expense, defined benefit scheme, contribution scheme and contractual pension (AFP)	defined 122
Note 14.	Other operating costs	122
Note 15.	Audit fees and costs for assistance from external auditor	122
Note 16.	Impairments on commitments	122
Note 17.	Tax cost	123



Note 17.1	Leases	124
Note 17.2	Maturity structure of leases, IFRS 16	124
Note 18.	Earnings per equity certificate and ownership ratio	125
Note 19.	Cash and receivables, central banks	125
Note 20.	Loans to and receivables from credit institutions	126
Note 21.	Loans to and receivables from customers	126
Note 21.1	Geographical distribution of gross lending	127
Note 21.2 te market	Distribution of loans between the retail market and corpora- 128	
Note 21.3	Loans, guarantees and losses by industry	128
Note 21.4	Commitments and loss provisions by industry	130
Note 21.5	Transferred mortgages to credit institutions	132
Note 21.6	Remaining term to maturity, Helgeland Boligkreditt AS	133
Note 22.	Financial instruments	134
Note 22.1	Financial instruments by category	134
Note 22.2	Debt securities, value hedging	136
Note 22.3	Assessment of fair value of financial instruments by level	138
Note 22.4	Fair value of financial instruments	140
Note 23.	Financial derivatives	140
Note 23.1 141	– Net presentation of financial assets and liabilities	
Note 24.	Certificates, bonds and shares	142
Note 24.1	Certificates and bonds	142
Note 25. value	Shares, unit trust certificates and equity certificates at fair 143	
Note 25.1 ity certificates	Additions/disposals of shares, unit trust certificates and equ- 144	
Note 26.	Investments in subsidiaries	144
Note 26.1	Specification of year's changes in subsidiaries	144
Note 26.2	Shares in subsidiaries	144
Note 27.	Associates and joint arrangements	145
Note 27.1 ments	Specification of changes in associates and joint arrange- 146	
Note 27.2	Strategic investments, not treated as associates	147
Note 28.	Related parties	147
Note 28.1	Intra-group eliminations/transactions	147
Note 28.2	Loans to elected representatives and employees	148
Note 29.	Deferred tax asset	148

Note 30.	Fixed assets	149
Note 31.	Intangible assets	150
Note 32.	Other assets	151
Note 33.	Foreign currency	151
Note 34.	Liabilities to credit institutions	151
Note 35.	Deposits from customers	151
Note 35.1	Deposits from customers by sector/industry	151
Note 35.2	Geographical distribution of deposits from customers	152
Note 35.3	Deposits from customers, different forms of deposit	153
Note 36.	Liabilities established through the issuing of securities	153
Note 36.1	Specification of bond loans	153
Note 37.	Other liabilities	157
Note 38.	Unused drawing facilities	158
Note 39.	Subordinated loan capital and subordinated bonds	158
Note 40.	Capital adequacy	159
Note 41.	Equity certificates	160
Note 41.1	Distribution of equity certificates	160
Note 41.2	Equity certificate capital	161
Note 41.3	The 20 largest owners	162
Note 41.4	Dividends	163
Note 41.5	Key figures, equity certificates	163
Note 42.	Guarantee liabilities by guarantee type	164
Note 43.	Pledged assets	164
Note 44.	Events after the balance sheet date	164
Note 45.	Balance sheet divided into current and non-current items	165
Note 46.	SpareBank 1 Helgeland - Statement from the Board of Directors and the CEO	166
Note 47.	Net income as a percentage of average total assets	167
Note 48.	Other key figures	168
Note 49.	Calculations	169

# Annual accounts - Notes

## NOTE 1. ACCOUNTING POLICIES

### GROUP AND PARENT BANK

### GENERAL

#### THE PARENT BANK

The objective of the Bank is to sell all types of financial products and services, including insurance and pension products to retail customers, small and medium enterprises, municipal authorities and institutions in Helgeland.

The Bank's registered office is situated at Jernbanegata 15, 8622 Mo i Rana. The Bank's head office is situated in Mo i Rana. The Bank also has three branches located across Helgeland: Mosjøen, Brønnøysund, Sandnessjøen. SpareBank 1 Helgeland's equity certificates are listed on Oslo Stock Exchange.

#### BASIS FOR PREPARATION OF THE ACCOUNTS

SpareBank 1 Helgeland prepares its consolidated and company financial statements in line with the international financial reporting standards (IFRS), which are the prevailing standards in Norway. This also includes interpretations from the IFRS interpretations committee (IFRIC). The consolidated and company financial statements are reported based on the historical cost principle, with the following exceptions:

- Financial derivatives, which are recognised at fair value via the income statement.
- Certificates, bonds and shares, which are recognised at fair value, with changes in value via the income statement
- Lending rate, which is recognised at fair value, with changes in value via the income statement.
- Fixed-rate debt securities, which is defined as a hedged item in value hedging.
- Lending held in order to receive cash flows and sales recognised at fair value via comprehensive income

For financial assets and liabilities, amortised cost is used, with the exception of financial instruments which are recognised at fair value. Amortised cost is the amount at which the instrument was valued upon initial recognition (cost price) less interest and instalments paid on the principal, plus accumulated effective interest and minus all net write-downs.

Fair value is the price that would have been

received when selling the asset, or paid in order to transfer the commitment between independent market operators at the time of recognition.

Financial instruments that are hedged items in a value hedge are capitalised at amortised cost with an adjustment for changes in the fair value of the hedged risk. This will often be approximately the same as fair value.

The preparation of the financial statements in line with IFRS requires the use of estimates. The use of international standards also requires that the management to exercise judgement. Areas where the assumptions and estimations are significant are described in Note 1.1.

The Bank's Board approved the consolidated financial statements on 27.02.25. The notes form an integral part of the financial statements.

#### SUBSIDIARIES

Subsidiaries include all companies over which the Bank, whether directly or through other subsidiaries, has control (i.e. the authority to manage a company's financial and operational principles with the intention of achieving benefits from the company's activities). Subsidiaries are consolidated from the date on which when the Bank acquires control, and eliminated from the date on which the Bank no longer has control. Subsidiaries are recognised at acquisition cost in the company's financial statements. Write-downs are performed when the carrying amount exceeds the value of the ownership share.

#### JOINT ARRANGEMENTS

IFRS 11 regulates joint arrangements. A joint arrangement has the following characteristics:

- a. the parties are bound by a contractual arrangement, and
- b. the contractual arrangement gives two or more of those parties joint control of the arrangement.

Joint control is a contractually agreed sharing of control over an arrangement, which exists only when decisions about the relevant activities require the unanimous consent of the parties sharing control.

An institution that is party to a joint arrangement must assess whether the contractual agreement jointly gives all parties, or a group of the parties, control of the joint arrangement. All parties,

or a group of the parties, jointly control the joint arrangement when they are required to act together in order to manage activities that significantly impact the return from the arrangement, i.e. the relevant operations.

After concluding that all the parties, or a group of the parties, control the arrangement collectively, an entity shall assess whether it has joint control of the arrangement. Joint control exists only when decisions about the relevant activities require the unanimous consent of the parties that collectively control the arrangement.

In a joint arrangement, no individual party controls the arrangement unilaterally. A party with joint control over a joint arrangement may prevent any of the other parties or a group of parties from controlling the arrangement.

A joint arrangement exists in cases where two or more parties have joint control over the arrangement. As a general rule, the parties must be bound by a contractual agreement that affords two or more of these parties control over the joint arrangement. In the case of joint ventures, the contract may be supplemented or replaced by the institution's/entity's articles of association, etc. as a basis for two or more parties having control. Parties with joint control of the arrangement must be able to prevent any other party or groups of parties from controlling the arrangement.

As the above shows, it is sufficient for the the parties that have a contractual agreement concerning joint control to have such control over the relevant operations. Consequently, the other owners will not be able to prevent decisions agreed between the parties in joint control. Financial statements are prepared for joint arrangement in accordance with the equity method.

As at 31.12.24, the following companies are defined as joint arrangements and have been consolidated in accordance with the equity method:

- Samarbeidende SpareBanker AS (4.1%)
- Samarbeidende SpareBanker DA (5.3%)
- SpareBank 1 SamSpar AS (4.5%)

## SEGMENT REPORTING

The Group's operations comprise only one strategic business area, which is organised and managed collectively. The Group carries on traditional banking operations involving the intermediary sale of savings, investment and insurance products. The Bank's operations are divided into the following segments: Retail Market (RM) and Corporate Market (CM). Income and expenses not directly allocated to these segments are presented as unallocated. The geographical segment is the Helgeland region, with only a small share outside of Helgeland.

## LENDING

Loans are recognised in the balance sheet

either as loans to or receivables from credit institutions or customers. Interest income on loans recognised at amortised cost and at fair value via other comprehensive income is recognised in the income statement under interest income according to the effective interest method, while interest income from fixed-rate loans recognised at fair value via the income statement is recognised under other interest income. Changes in value due to impairment are recognised in the income statement under losses on loans, guarantees, etc. Changes in the value of fixed-rate loans, which are recognised at fair value, are recognised in the income statement under net profit/loss from financial instruments, with the exception of mortgages in the Parent bank, which are recognised via other comprehensive income.

## CERTIFICATES AND BONDS

This balance sheet item includes the Group's certificates and bonds. All changes in value and realised gains/losses are recognised under net income from financial instruments. Interest income from certificates and bonds is recognised under other interest income.

## FINANCIAL DERIVATIVES (ASSETS AND LIABILITIES)

This balance sheet item includes financial derivatives. Changes in value linked to derivatives are recognised via the income statement under net income from financial instruments.

## SECURITIES ISSUED

The balance sheet item includes debt established through the issuing of securities. Effective interest is recognised in the income statement under interest expenses and other similar expenses.

Fixed-rate debt securities are subject to fair value hedging. Changes in value are recognised under net profit or loss on financial instruments. In the event of early repayment or buy-back of issued bonds, any gain/loss is recognised under net income from financial instruments.

## SUBORDINATED LOAN CAPITAL

The balance sheet item includes issued subordinate loans. Interest is recognised in the income statement under interest expenses and similar costs.

## SUBORDINATED BONDS

The balance sheet item includes subordinated bonds. Subordinated bonds are perpetual and the Bank has a unilateral right not to pay interest to investors, subject to certain conditions. Subordinated bonds do not meet the definition of financial liability in accordance with IAS 32 and are classified as equity. Interest is not presented as an interest expense in the income statement, but as a reduction in other equity. Tax on interest in subordinated bonds are recognised via the income statement.

## CHANGES IN ACCOUNTING POLICIES AND DISCLOSURES

The accounting policies that are applied are in all material respects consistent with the policies applied during the previous financial period.

No changes in standards or interpretations occurred during 2024 that resulted in any material changes to the Bank's accounting policies. No new standards or interpretations have entered into force that are expected to have a material impact on the Bank's financial statements.

## FINANCIAL INSTRUMENTS

Financial instruments are recognised in accordance with IFRS 9. The measurement categories for financial instruments in IFRS 9 consist of changes in value via the income statement, fair value with changes in value via other comprehensive income profit (OCI) and amortised cost.

Recognition of financial assets is determined upon initial recognition of the asset. The business model for holding the financial instruments will be decisive for determining the category.

Financial instruments held to receive contractual cash flows are in principle recognised at amortised cost.

Financial assets held to receive contractual cash flows and for resale are in principle recognised at fair value, with changes in value via other comprehensive income (OCI).

Instruments with cash flows that are not only payments of interest and principal, or where the purpose of owning the instrument is not to receive contractual cash flows, are recognised at fair value, with changes in value via the income statement. Derivatives used in connection with hedge accounting are recognised according to the principles for hedge accounting. Note 2.1.1 shows lending and impairments in accordance with IFRS 9.

## RECOGNITION AND DERECOGNITION

Financial assets and liabilities are capitalised when the Bank becomes a party to the instrument's contractual provisions.

Financial assets are derecognised when the contractual right to the cash flows from the financial asset expire, or the Bank transfers the financial asset in such a way that the risk and profit potential of the financial asset is largely transferred. Financial liabilities are derecognised when they are fulfilled, cancelled or expire.

## FINANCIAL INSTRUMENTS AT AMORTISED COST

Debt instruments that have cash flows that only represent the payment of interest and instalments, and where the purpose is only to hold the instrument in order to receive contractual cash flow, are recognised at amortised cost. Within the Group, all loans and loans with floating interest rates are classified at amortised cost. The Parent

bank's financial statements include an exception related to lending to personal customers with collateral in housing. This arises as a result of the fact that many of the loans will subsequently be sold to the Bank's wholly owned mortgage credit institution and will therefore be recognised as held for the collection of contractual cash flows and sale in accordance with IFRS 9. Financial instruments at amortised cost primarily comprise the following:

### Assets and liabilities:

- Loans at floating interest rates
- Liabilities to credit institutions and deposits from customers
- Debt securities at floating interest rates
- Subordinate debt at floating interest rates

## LOANS TO CUSTOMERS

Loans to and receivables from customers are initially recognised at fair value with the addition of direct transaction costs. During periods after initial recognition, loans at amortised cost are valued according to the effective interest method. Loans are written down in accordance with IFRS 9.

Impairments are calculated as the difference between the carrying amount and the present value of future cash flows, calculated over the expected life of the loan. For the present value calculation, the most recently determined effective interest rate on the loan or loans to be written down is used.

## POTENTIAL EXPOSURE

Unutilised drawing rights and approved, non-discounted loans are off-balance sheet items which are presented in notes. Revenue is recognised under commission income and income from banking services. Off-balance sheet items included in the calculation of expected losses and the loss provisions are presented in the balance sheet under "Other liabilities".

## IMPAIRMENTS ON LOANS

The rules in IFRS 9 regarding impairment of financial assets apply to commitments recognised at amortised cost (commitments with floating interest rates are defined under this category) and to commitments recognised at fair value, with changes in value via other comprehensive income (mortgage loans at floating interest rates in the Parent bank). The standard also entails requirements regarding loss provisions on new commitments, in that an impairment must be performed for expected credit losses as a result of expected default in the next twelve months. Expected losses for all customers are calculated at account level. The calculation includes loans, guarantees, unused credit and loan commitments.

For loans where the credit risk has increased substantially following initial recognition, impairments must be performed for the expected credit loss over the maturity of the loans. The Bank uses a model for this developed by the SpareBank 1 Alliance, which is used by the Alliance banks. The



model contains macro-scenarios in accordance with IFRS 9 (three scenarios). The model is described in more detail in Note 2.1.1.

Expected losses are calculated for all accounts. All account commitments are placed in one of the three “stages” in the loss model, based on their change in risk since approval (change in credit risk). See the explanations below for a description of the individual “stages”. All commitments that do not already have objective evidence of loss at the time of recognition are placed in stage 1; and subsequently moved to stage 2 in cases where there has been a significant increase in credit risk; or stage 3 in cases where there is objective evidence of loss.

#### **Stage 1: 12-month expected credit loss.**

This includes most cases of financial assets that are covered by the general loss model. Financial instruments that have a similar probability of default (or better) over the remaining term as upon initial recognition are covered by this stage. The estimated expected loss which is recognised in the financial statements corresponds to the expected loss from default in the next 12 months.

#### **Stage 2: Expected loss over lifetime.**

Financial assets that have seen a significant increase in the probability of default (PD) since initial recognition are placed in stage 2. Whether or not a commitment is significantly worsened is determined by comparing the probability of default (PD) at the time of approval with the PD at the time of calculation.

The assessment of significant deterioration is based on both the relative increase in PD and the absolute change. The level has been set so that both the relative change is significant and the level itself is not immaterial compared to what is considered to be low risk. A commitment is deemed to be significantly worse if, at the time of calculation, it has a PD higher than 0.60% and there is an increase in PD of 150% or more.

In addition, the following events are also considered to constitute a significant increase in credit risk:

Commitments where there is a 30-day cover or arrears.

Customers with active forbearance or customers in probationary period

Customers under surveillance (watchlist)

The Bank has internal procedures for marking and identifying customers who have been granted payment deferment. A customer who has been granted payment relief covered by the Financial Supervisory Authority of Norway's reporting guidelines will be marked for a period of at least 2 years.

#### **Stage 3: Expected loss over lifetime.**

Step 3 of the loss model contains assets where there is objective evidence of loss at the time of reporting. The expected credit loss for assets in stage 3 is calculated over the remaining term of the

asset. Interest income is calculated on the net book value of the asset. Stage 3 includes both defaulted loans and credits, as well as commitments where there is other objective evidence for loss.

The same model is used for the Group, parent bank and wholly owned mortgage credit institution.

### **OBJECTIVE EVIDENCE OF LOSS**

Based on current internal guidelines, commitments are continually monitored with a view to identifying potentially doubtful commitments. Objective evidence of loss is default in accordance with the definition below, as well as loans and other commitments which are not in default, but where the customer's financial situation renders it probable that the Group will incur a loss.

In addition to defaulted commitments, the Bank has stated that objective evidence of loss exists in a commitment where bankruptcy proceedings have been opened, confirmed losses have been incurred on the commitment, an individually assessed provision has been made, or where there are other individual assessments which indicate that there is objective evidence of loss. In the case of individually assessed impairments, model impairments are overridden for the commitment concerned. Objective evidence of loss is considered at customer level.

### **DEFAULTS**

The total commitment from a customer is considered to be in default when overdue instalments or interest are not paid within 90 days after the due date, and during this period, the defaulted amount continuously exceeded NOK 1 000 in the case of the retail market or NOK 2 000 in the case of the corporate market, as well as a relative maximum amount of 1% of the total commitment.

Amended payment terms resulting from payment difficulties are flagged as being in default if the amendment results in a change in the value of cash flow in excess of 1%. Several amendments to payment terms linked to payment difficulties within a period of one year result in the customer being treated as being in default. Customers with individual impairments are treated as being in default. The portfolio is also reviewed on a quarterly basis to identify customers that should be individually flagged with “unlikeliness to pay”. See also the section on objective evidence for losses.

### **NON-RECOVERABLE LOSSES**

When it is highly probable that losses are final, the losses are classified as non-recoverable. As a result, the asset and associated loss provisions are derived from the balance sheet. Non-recoverable losses covered by previous loss provisions are recognised against loss provisions. Non-recoverable losses not covered by previous loss provisions and over- or under-cover in relation to previous loss provisions are recognised in the income statement.

**RECOVERY**

Stage 1 is regarded as the standard stage. Any account commitment which at the time of calculation does not meet the criteria for stages 2 or 3, as described above, will be placed in stage 1.

**MODIFICATION**

When the contractual cash flows from a financial asset are renegotiated or otherwise changed, and the renegotiation or change does not result in the derecognition of the financial asset, the gross carrying amount for the financial asset is recalculated and a gain or loss is recognised in the income statement. The gross carrying amount for the financial asset is recalculated as the present value of the renegotiated or amended contractual cash flows, discounted by the original effective interest rate on the financial asset. Any accrued costs or fees are taken into account in the calculation.

**LIABILITIES TO CREDIT INSTITUTIONS AND DEPOSITS FROM CUSTOMERS**

Liabilities to credit institutions and deposits from customers are recognised at amortised cost. Upon initial recognition, liabilities are recognised at fair value plus direct transaction costs. Upon subsequent recognition, the liabilities will then be recognised at amortised cost using the effective interest method.

**DEBT SECURITIES WITH FLOATING INTEREST RATES**

Upon initial recognition, liabilities are recognised at fair value plus direct transaction costs. Upon subsequent recognition, the liabilities will then be recognised at amortised cost using the effective interest method.

- Financial instruments at fair value
- over profit or loss
- Assets and liabilities:
- Fixed-rate loans
- Derivatives without hedging
- Certificates, bonds (interest-bearing securities) and shares

**LOANS AND DEPOSITS AT FIXED-RATES**

Fixed-rate loans and deposits are recognised at fair value (FVO). The Bank uses interest rate derivatives to financially reduce interest rate exposure in these products. The use of the fair value option (FVO) significantly reduces the profit volatility that would normally occur, using different estimation methods for lending and derivatives. The fair value is estimated by discounting the future cash flows (interests and instalments) from the loans with yield requirements derived from the yield curve on the balance sheet date. Margin curves and the credit spread for loans and deposits are estimated as an overall evaluation based on observed changes in the market.

**CERTIFICATES, BONDS AND SHARES**

Certificates, bonds and shares are classified at

fair value. The fair value of listed investments is based on the current price as at the balance sheet date. For shares that are not listed on the stock exchange and where there is no active market, known trading values or the last issue price are used as a basis. Securities without sale are valued on the basis of available accounting information or similar.

**HEDGING OF FINANCIAL INSTRUMENTS**

- Assets and liabilities:
- Debt securities with fixed interest rates
- Hedging derivatives

The Bank and the Group use hedge accounting for debt securities at fixed interest rates. The hedge covers the interest rate risk in the bonds. Changes in value are recognised under net gains/losses on financial instruments. In the event of early repayment or repurchase of issued bonds, any gain/loss is recognised under net gains/losses on financial instruments. The Bank's policy is to hedge all exposure against debt securities with a fixed interest rate. The Group only has fair value hedging on debt securities in Norwegian kroner with fixed interest rates. The hedging instruments secure the total amount and have a maturity, volume and fixed interest rate corresponding to the individual fixed rate loan. The floating rate in the hedging instrument is agreed at the 3-month NIBOR.

IFRS 9 simplifies the requirements for hedge accounting by linking hedge effectiveness more closely to risk management, and thus provides greater opportunity for qualitative assessment. In order to use hedging accounting in accordance with IFRS 9, there must be a financial relationship between the hedging instrument and the secured element. In addition, the effect of credit risk must not dominate value changes in the hedging relationship. In accordance with the requirements of IFRS 9, a prospective (future-oriented) effectiveness test is sufficient. Effectiveness tests are carried out in accordance with the requirements of IFRS 9. The ineffectiveness of the hedge, defined as the difference between the value adjustment of hedging instruments and the value adjustment of the hedged risk, is recognised in the income statement as it arises. The fair value of the derivatives used in hedging relationships is shown in Note 22.2.

**FINANCIAL ASSETS AT FAIR VALUE VIA OTHER COMPREHENSIVE INCOME (OCI)**

Assets:

- Mortgages at floating interest rates

In accordance with IFRS 9, the loans must be classified at fair value via other comprehensive income (held to receive contractual cash flows and resale). The Bank only sells a proportion of the loans that qualify for transfer to the mortgage companies. Lending that is included in the business model which qualifies for sale is therefore held in order to receive contractual cash flows and

for sale. Based on this, the Bank therefore classifies all mortgages that qualify for sale at fair value over other comprehensive income.

### INTEREST INCOME AND INTEREST EXPENSES

Interest income is recognised as income using the effective interest method. This entails the ongoing recognition of nominal interest rates, with the addition of amortisation of establishment fees minus direct establishment costs. Income recognition of interest using the effective interest method is used for both balance sheet items recognised at amortised cost and balance sheet items recognised at fair value via the income statement. Interest income for financial assets in stages 1 and 2 is calculated using the effective interest rate method on the financial asset's gross value, while interest income for financial assets in stage 3 is calculated based on the net value of the financial asset.

### COMMISSION INCOME AND COSTS

Commission income and costs are recognised in the income statement as a service is provided and the Bank becomes entitled to payment in accordance with IFRS 15. Included in this are fees from payment mediation and insurance sales.

### INTANGIBLE ASSETS

Intangible assets essentially consist of goodwill and customer relations associated with the acquisition of SpareBank 1 Nord-Norge's business in Helgeland. Goodwill and other intangible assets are recognised when the balance sheet requirements are met. Goodwill is not depreciated, but is subject to an annual impairment test in accordance with IAS 36, with the aim of identifying any fall in value. Impairment of goodwill is recognised via the income statement, and is not reversed.

Customer relations and other intangible assets with an identifiable lifetime are depreciated over the life of the asset. Depreciation commences at the time the asset becomes available for use

### FIXED ASSETS

Tangible fixed assets and property are valued at historic cost and written off over the expected economic life of the asset. It is a requirement that the various elements with different lifetimes are separated out and written off separately. Ordinary depreciation is based on cost price and distributed

linearly over the economic life of the fixed assets:  
Buildings and other real property 30 – 40 years  
Machinery, equipment, fixtures and vehicles 3 – 10 years

The depreciation period and method are evaluated annually to ensure that the period and method used is in line with the financial realities of the asset. The same applies to the salvage value.

### LEASES

The Group as lessee:

The Group's leases are recognised in accordance with the rules of IFRS 16. The principles for IFRS 16 stipulate the recognition, measurement, presentation and disclosure of leases, and require the lessee to account for all leases in a simple balance sheet model. The Group recognises the usufruct asset and associated liability at fair value at the time of recognition. The asset is depreciated over the leasing period, while the liability is recognised at amortised cost.

The Group uses the following practical exemptions for leases:

Exemption for short-term leases (defined as twelve months or less) exemption for low-value assets (less than USD 5 000) As regards the leases that fall under these exemptions, the Group recognises rental payments under "Other operating costs" in the income statement as they arise.

### THE GROUP AS LESSOR:

The Group presents assets that are leased as fixed assets in the balance sheet. Rental income is recognised in the income statement over the leasing period. The introduction of IFRS 16 has no effect on the Group as a lessor.

### TAXES

Deferred tax and deferred tax asset are capitalised in accordance with IAS 12 Income tax. The tax cost in the income statement includes both the period's payable tax and change in deferred tax. Deferred tax/deferred tax asset is estimated as being 25% of the net temporary differences that exist between accounting and tax values at the end of the financial year. Tax-increasing and tax-reducing temporary differences that reverse or could reverse in the same period are offset and recognised net.

Deferred tax assets are capitalised based on expectations regarding taxable income through earnings in subsequent years. Payable tax in the balance sheet comprise the payable tax for the period linked to the profit for the year, tax on wealth and payable tax linked to group contributions received. Wealth tax is treated as an operating cost.

### EQUITY CERTIFICATE CAPITAL

Equity consists of equity share capital, primary capital, fund for unrealised gains, other equity (Group) and hybrid capital.

The equity share capital consists of capital related to equity certificates, own equity certificates, share premium reserve and equalisation fund. Primary capital includes paid and accrued primary capital, the gift fund and the compensation fund.

In the Parent bank, the fund for unrealised gains consists of gains on changes in the value of financial instruments where the principle for valuation in accordance to IFRS deviates from the principle according to Norwegian Good Accounting Practice (Norsk God Regnskapsskikk).

Other equity (Group) consists of accrued equity in subsidiaries and associated companies following group establishment and the effect of equity eliminations in the consolidated financial statements.

Subordinated bonds that do not satisfy the definition of financial obligation in accordance with IAS 32 are recognised under equity. Accrued interest on subordinated bonds is allocated to subordinated bond capital.

In connection with the issuing of new equity certificates or the acquisition of other enterprises, the additional costs directly attributable to the new equity certificates or acquisition are treated as a reduction in paid-up capital. Profit for the year is allocated to the owners of equity certificates and the primary fund in accordance with the dividend policy.

Dividends from equity certificates and distributions to the gift foundation are classified as equity until the dividend has been determined by the Bank's Supervisory Board. Transfers to the Bank's gift fund are classified as equity until the gift allocation is completed. When the dividend has been approved by the Supervisory Board, it is eliminated from equity and classified as a current liability until the payment date. When the Bank or other companies in the Group purchase equity certificates issued by the Bank, the combined purchase consideration is eliminated from the total equity certificate capital.

### CASH FLOWS

The cash flow statement (IAS 7) shows payments and payouts of cash and cash equivalents

throughout the year. Cash and cash equivalents are defined as cash and receivables from central banks. The Group uses the direct method.

Cash and cash equivalents consist of cash, bank deposits, other short-term, readily negotiable investments with an original term not exceeding three months.

### COMPARABILITY

Comparative figures are adjusted where it is deemed necessary to ensure comparability with the presentation for the present year.

### EVENTS AFTER THE BALANCE SHEET DATE

Events after the reporting date are reported in accordance with IAS 10. The information covers events which are not recognised in the consolidated financial statements, but which are of significance to the evaluation of the business.

The financial statements are submitted under the assumption of a going concern. In the opinion of the Board, this assumption was met at the time the financial statements were approved for submission. The Board's recommendation regarding a dividend is presented in the annual report.

The financial statements are submitted under the assumption of a going concern. In the opinion of the Board, this assumption was met at the time the financial statements were approved for submission. The Board's recommendation regarding a dividend is presented in the annual report.

## NOTE 1.1 ACCOUNTING ESTIMATES AND DISCRETIONARY ASSESSMENTS

### PARENT BANK AND GROUP

The Group prepares estimates and assumptions which have an impact on reported balance sheet figures for the next financial year. Estimates and assessments are constantly subject to evaluation and are based on historical experience and other factors, including expectations in relation to future events which are deemed to be reasonable.

### IMPAIRMENTS ON LOANS

Assessments of write-downs are partly based on judgement. Loan portfolios/guarantee liabilities are continuously monitored with regard to the need for impairment/provisions. Impairment/provisions are implemented in accordance with IFRS 9. See the accounting policies and Note 2.1.1.

## NOTE 2. FINANCIAL RISK MANAGEMENT

### GROUP AND PARENT BANK

### RISK AND CAPITAL MANAGEMENT

Risk and capital management supports the Group's strategic development and ambitions, and helps to ensure attainment of the Group's financial and operational objectives. Nevertheless, unforeseen losses can occur which require the Group to have sufficient equity. As a part of the risk management process, the requirement for supplementary capital for the various risk areas is evaluated. These assessments are underpinned by computational models. This is summarised in the Bank's Internal Capital Adequacy Assessment Process (ICAAP).

#### Risk categories and definitions:

- **Credit risk:** The risk of losses as a result of customers or counterparties being unable to fulfil their obligations.
- **Liquidity risk:** The risk of the Group being unable to meet its obligations at maturity.
- **Market risk:** The risk of losses due to changes in market prices linked to activities and positions in securities (interest and shares) and currency.
- **Operating risk:** the risk of direct or indirect losses due to failures in internal routines, systems and processes, insufficient competency, damage to assets, suspension of operations, system failure, and internal or external fraud.
  - **Compliance risk:** Risk of not complying with regulatory requirements and internal procedures/guidelines
  - **Anti-money laundering risk:** Risk of not complying with anti-money laundering and terrorist financing laws and regulations, and not complying with internal regulations with the intention of fulfilling the requirements of the law.
  - **ICT risk:** Risk of our ICT solutions not working as intended, being misused or data being compromised or going astray.

- **ESG risk:** Risk of loss arising from actual or potential impacts from ESG factors that impact the Bank's core business.
- Risk management is pivotal to the day-to-day operation and the ongoing work of the Board. Risk is primarily managed through the risk and capital strategy, overarching standards, policies, periodic measurement and reporting of established management goals in all business areas, frameworks, procedures, authorities, disclosure requirements and competency requirements.

### CORPORATE GOVERNANCE

SpareBank 1 Helgeland's principles and policies for corporate governance are intended to ensure that the Bank operates in line with generally accepted and recognised practices and standards, as well as laws and regulations. Good corporate governance within SpareBank 1 Helgeland encompasses the values, goals and general principles by which the Bank is governed and controlled. This is in order to ensure good cooperation between the Bank's various stakeholders, such as equity certificate holders, creditors, customers, employees, governance bodies, management and society at large.

Corporate governance should ensure prudent asset management and give greater assurance that communicated goals and strategies are being implemented and achieved. The Group's principles and frameworks for risk management and internal control are enshrined in the governance documents, which are reviewed annually by the Board. Governance documents are corporate governance policies with underlying procedures.

The Board of SpareBank 1 Helgeland strives to comply with the principles laid down in the Norwegian Code of Practice for Corporate Governance, as well as relevant principles for the area from the EBA guidance.



The Board considers that the Bank's corporate governance is satisfactory and in accordance with relevant recommendations. A comprehensive account of corporate governance can be found in a separate chapter of the annual report.

## NOTE 2.1 CREDIT RISK

### GROUP AND PARENT BANK

Credit risk constitutes the risk of customers or counterparties being unable to fulfil their obligations with respect to the Group. The credit risk, and exposure to this, is managed by the risk and capital strategy, credit policy, credit standards credit routines and granting rules. Credit policy, credit standard, credit routines and granting rules were adopted in November 2024, and applied from 01.01.25.

The Group's policy for the area of credit is derived from the overarching risk and capital strategy and contains standards and management frameworks for risk profiles and risk concentrations at a portfolio level and industry level. There are set limits for allocation of lending between the retail and corporate markets, size of commitment and number thereof, exposure within sectors (concentration risk) and geographical limitations. The risk management framework is monitored and reported quarterly to the Board, supplemented by annual portfolio reviews.

Developments in credit risk are monitored through regular analyses of the trend in defaults in specific sectors, geographical areas, borrowers' and potential borrowers' ability to service interest and instalments, and an assessment of the collateral that underlies the credit commitments. For the ongoing monitoring of risk, a set of actions and action plans for the follow-up of borrowers has been defined, along with reports which are submitted periodically to the Board.

The total capital requirement for credit risk is stated in the Group's ICAAP. The level of tolerance for credit risk is defined for selected sectors and areas. A management level for the corporate market portfolio has been established and is followed and reported periodically. Stress tests are used to assess the loss potential in the credit portfolio as a result of a large fall in property prices.

The risk in the retail market portfolio has been low over time. Demand for homes declined in 2024 and house prices dropped as a result of higher inflation and thus higher mortgage interest rates.

Based on the loss rules in IFRS 9 and internal

guidelines, commitments are monitored continuously with a view to identification and modelling.

There is a strong focus on this area and regular reviews are carried out of good credit practices and the quality of the work relating to credit. This includes an understanding of good monitoring and the control of customer portfolios. Compliance through individual cases is ensured through the Credit Committee, the managers' key controls, and the delegation of tasks between advisors and custodians.

For the corporate market, management and monitoring are ensured through the ongoing assessment of customer relationships, ability to pay, and collateral assessments. This takes place through both monthly and quarterly reviews. For monitoring and development in the retail market portfolio, quarterly analyses are carried out concerning the quality of approved loans, along with six-monthly analyses of the overall portfolio.

The risk-distributed loan portfolio, broken down according to low (risk class A-D), medium (risk classes E-G) and high risk (risk classes H-K), is reported based on the scoring models. Risk migration is reported quarterly as part of the overall reporting of risk to the Board.

Close monitoring of key corporate customers and monitoring of the probability of default in the portfolio and for specific defined sectors have been continued as priority focus areas. At the end of 2024, the Bank had two (one) commitments which together represented more than 10% of the Bank's Tier 1 capital.

## NOTE 2.1.1 LOANS AND LOSS PROVISIONS

### WRITE-DOWNS FOR LOSSES ON LOANS AND OFF BALANCE SHEET ITEMS IN ACCORDANCE WITH IFRS 9

See the description in Note 1 - Accounting policies.

### ASSUMPTIONS USED IN THE CALCULATION MODEL

Periodically expected losses are calculated as the product of probability of default (PD), exposure at default (EAD) and loss given default (LGD), and must be unbiased. As a result of the transition to the SpareBank 1 Alliance, the Bank switched to a common IFRS 9 model during 2022. The model is subject to continuous development and improvement, and the Bank is now on version 3 of the loss model. The development and modification of the model has not resulted in material changes to the Group's loss provisions.

#### PD

The PD model provides an indication of the probably at customer level, one year ahead. The PD model gives the probability that the customer will default on all their commitments. The customer's PD can therefore be used at account level. The PD model has been in use since 2002, and has been continually revised and validated.

No models have been developed to calculate lifetime PD. Models are therefore used which calculate the probability of default in the next 12 months (12-month PD). The probability of default is calculated on the basis of historical data series for key financial figures, as well as non-financial criteria such as behaviour and age. Nine risk classes (A – I) are used to group customers according to probability of default. In addition, two risk classes (J and K) are used for customers with non-performing and/or written-down commitments.

#### LOSS GIVEN DEFAULT

The loss given default (LGD) model is a function of the relationship between the commitment and the underlying collateral, the probability of recovery, recovery of unsecured parts and the costs associated with realisation. The collateral coverage is determined at customer level based on realisation values for the assets. Collateral coverage is limited upwards to the usable collateral, including downward adjustment of collateral coverage based on the quality of the collateral. See Note 21 for a more detailed description of collateral. Seven classes (1-7) are used to classify collateral in

per cent.

#### EXPOSURE AT DEFAULT

Exposure at default (EAD) gives an indication of the expected exposure at the time of default. EAD is a function of the expected balance, grant and a conversion factor. This means that EAD will always be somewhere between the balance and the amounted granted.

#### SCENARIOS

The model uses three different scenarios, which impact on the projected LGD, PD and PP. The scenarios are developed based on key figures from the monetary policy report and financial outlook, and are reviewed quarterly by the Bank.

#### SCENARIO DESCRIPTIONS

The scenarios were determined based on an overall assessment of a number of macro-variables and other factors, including unemployment, price falls and interest rate levels. There are effects at overall level for PD and collateral values which form the basis for possible adjustments to scenarios. In 2023, a macro model was adopted, which, based on Norges Bank's Monetary Policy Report and Statistics Norway, forecasts PD based on expected unemployment and interest rates in each scenario.

#### THREE SCENARIOS HAVE BEEN DEFINED:

**Scenario 1 – Normal economy:** A macroeconomic scenario that represents expected future economic growth over the next five years. Realistic scenario is a scenario comparable to the 'Base case' ICAAP scenario. This scenario represents stable and moderate global and national economic growth. This scenario is weighted by 80%.

**Scenario 2 – Recession:** Economic outlook is worse than scenario 1 (given that the country is not actually experiencing or facing an ongoing severe recession). In this case, a recession comparable with that used in ICAAP is assumed.

PD and LGD are significantly higher than in scenario 1, corresponding to the levels seen at the time of the previous financial crisis, adjusted for changes in portfolio quality. This scenario is weighted by 10%.

**Scenario 3 – Economic boom:** Is a macroeconomic scenario that represents a better scenario than scenario 1. With significant economic growth, very low unemployment and low interest rates. This scenario is weighted by 10%.

Scenario	variable	0	1	2	3	4	5	Comments
1	Unemployment	2.9	2.9	3.0	3.0	3.0	2.8	Unemployment measured by Statistics Norway's labour force survey. Norges Bank's Monetary Policy Report 3/24
1	Interest rate	4.7	4.7	4.4	3.7	3.2	3.1	Money market interest rate, measured as average for four quarters. Norges Bank PPR 3/24
2	Unemployment	4.0	7.1	8.6	8.7	8.0	5.5	Unemployment measured by Statistics Norway's labour force survey. Financial outlook June 2023
2	Interest rate	4.7	6.1	5.4	4.4	4.0	3.0	Money market interest rate. Financial outlook June 2023. Lending rate - 2 pp
3	Unemployment	2.0	2.3	2.3	2.3	2.5	2.8	
3	Interest rate	4.7	3.6	2.5	2.5	2.8	3.0	Year 4 is the average of the predictions for years 3 and 5

## SENSITIVITY ASSESSMENTS OF KEY ASSUMPTIONS

The model is most sensitive to the parameters LGD and PD. These have a sensitivity of up to 70% when they are altered for both the retail market and the corporate market. Accordingly, a 10% change in LGD/PD would result in a change in loss provisions of up to 7.5% and 6.0% respectively. A high sensitivity indicates that the outcome of the model is particularly affected by changes in these parameters. Parameters with high sensitivity are therefore closely monitored with regard to model input and validation.

## ESTIMATE UNCERTAINTY

There is underlying estimate uncertainty linked to a number of the parameters used in the model. This is mainly linked to underlying collateral

values, parameters in LGD and PD. There are no indications of significant errors or deficiencies in the model at the end of 2024, but there is considerable uncertainty relating to the estimates of the loss provisions, particularly linked to possible future developments in the macro picture.

variable	Scenario	+10% PD	+10% LGD
ECL	1	5.9%	7.1%
ECL	2	6.3%	8.9%
ECL	3	5.1%	5.7%
<b>ECL</b>	<b>Combi</b>	<b>6.0%</b>	<b>7.5%</b>

### PARENT BANK

### GROUP

**31.12.24**
**31.12.24**

Provision for losses on loans (exc. individual write-down)	Base Case	Effect of Scenario	Effect of macro-scenarios on estimated loss	Provision for losses on loans (exc. individual write-down)	Base Case	Effect of Scenario
126	105	21	Loss provisions under IFRS 9	126	105	21

### PARENT BANK

### GROUP

**31.12.23**
**31.12.23**

Provision for losses on loans (excl. individual write-down)	Base Case	Effect of Scenario	Effect of macro-scenarios on estimated loss	Provision for losses on loans (excl. individual write-down)	Base Case	Effect of Scenario
95	73	22	Loss provisions under IFRS 9	96	73	23

## GROSS LENDING

	STAGE 1	STAGE 2	STAGE 3	GROUP 31.12.24
Gross lending (excluding fixed interest rate)	With expected loss over 12 months	Expected loss over the lifetime of the instrument	Expected loss over the lifetime of the instrument	Total
<b>Gross lending (excl. fixed rate loans) as at 01.01.24</b>	<b>25 233</b>	<b>2 704</b>	<b>523</b>	<b>28 459</b>
Provision for loss transferred to Stage 1	581	-551	-30	0
Provision for loss transferred to Stage 2	-1 163	1 179	-16	0
Provision for loss transferred to Stage 3	-117	-73	190	0
New issued or purchased financial assets	6 406	118	6	6 530
Increase in deductions on existing loans	4 567	450	50	5 068
Reduction in deductions on existing loans	-4 558	-526	-65	-5 149
Excluded financial assets	-3 960	-230	-64	-4 253
Change due to established impairments ( <i>non-reversible losses</i> )	-15	-19	-35	-69
<b>Gross lending (excl. fixed rate loans) as at 31.12.24</b>	<b>26 974</b>	<b>3 053</b>	<b>559</b>	<b>30 586</b>
Gross lending (excl. fixed rate loans) as at 31.12.24 RM	18 739	870	112	19 721
Gross lending (excl. fixed rate loans) as at 31.12.24 CM	8 235	2 183	448	10 866
Unused credit and financial guarantees	3 176	144	17	3 338

Fixed rate lending, which is recognised at fair value, with changes in value via the income statement, is not included.

	STAGE 1	STAGE 2	STAGE 3	GROUP 31.12.23
Gross lending (excluding fixed interest rate)	With expected loss over 12 months	Expected loss over the lifetime of the instrument	Expected loss over the lifetime of the instrument	Total
<b>Gross lending (excl. fixed rate loans) as at 01.01.23</b>	<b>25 888</b>	<b>3 470</b>	<b>320</b>	<b>29 678</b>
Provision for loss transferred to Stage 1	705	-705	-1	0
Provision for loss transferred to Stage 2	-1 225	1 250	-25	0
Provision for loss transferred to Stage 3	-158	-49	207	0
New issued or purchased financial assets	4 008	145	6	4 159
Increase in deductions on existing loans	5 653	292	140	6 085
Reduction in deductions on existing loans	-5 975	-572	-68	-6 615
Excluded financial assets	-3 663	-1 110	-39	-4 813
Change due to established impairments ( <i>non-reversible losses</i> )	-1	-17	-17	-35
<b>Gross lending (excl. fixed rate loans) as at 31.12.23</b>	<b>25 233</b>	<b>2 704</b>	<b>523</b>	<b>28 459</b>
Gross lending (excl. fixed rate loans) as at 31.12.23 RM	17 004	981	113	18 098
Gross lending (excl. fixed rate loans) as at 31.12.23 CM	8 229	1 723	409	10 362
Unused credit and financial guarantees	2 878	154	15	3 047

Fixed rate lending, which is recognised at fair value, with changes in value via the income statement, is not included.

## PARENT BANK

	STAGE 1	STAGE 2	STAGE 3	31.12.24
<b>Gross lending (excluding fixed interest rate)</b>	With expected loss over 12 months	Expected loss over the lifetime of the instrument	Expected loss over the lifetime of the instrument	Total
<b>Gross lending (excl. fixed rate loans) as at 01.01.24</b>	<b>21 135</b>	<b>2 551</b>	<b>523</b>	<b>24 209</b>
Provision for loss transferred to Stage 1	543	-513	-30	0
Provision for loss transferred to Stage 2	-1.112	1 128	-16	0
Provision for loss transferred to Stage 3	-116	-72	188	0
New issued or purchased financial assets	5 562	100	6	5 668
Increase in deductions on existing loans	4 526	446	50	5 022
Reduction in deductions on existing loans	-4 370	-517	-65	-4 953
Excluded financial assets	-2 996	-172	-64	-3 232
Change due to established impairments ( <i>non-reversible losses</i> )	-15	-19	-35	-69
<b>Gross lending (excl. fixed rate loans) as at 31.12.24</b>	<b>23 155</b>	<b>2 932</b>	<b>557</b>	<b>26 644</b>
Gross lending (excl. fixed rate loans) as at 31.12.24 RM	14 845	758	109	15 712
Gross lending (excl. fixed rate loans) as at 31.12.24 CM	8 310	2 174	448	10 932
Unused credit and financial guarantees	2 761	144	17	2 923

Fixed rate lending, which is recognised at fair value, with changes in value via the income statement, is not included.

## PARENT BANK

	STAGE 1	STAGE 2	STAGE 3	31.12.23
<b>Gross lending (excluding fixed interest rate)</b>	With expected loss over 12 months	Expected loss over the lifetime of the instrument	Expected loss over the lifetime of the instrument	Total
<b>Gross lending (excl. fixed rate loans) as at 01.01.23</b>	<b>21 641</b>	<b>2 693</b>	<b>320</b>	<b>24 654</b>
Provision for loss transferred to Stage 1	642	-641	-1	0
Provision for loss transferred to Stage 2	-1 165	1 189	-24	0
Provision for loss transferred to Stage 3	-158	-49	207	0
New issued or purchased financial assets	3 443	133	6	3 581
Increase in deductions on existing loans	5 401	283	140	5 824
Reduction in deductions on existing loans	-5 593	-553	-68	-6 214
Excluded financial assets	-3 075	-488	-39	-3 602
Change due to established impairments ( <i>non-reversible losses</i> )	-1	-17	-17	-35
<b>Gross lending (excl. fixed rate loans) as at 31.12.23</b>	<b>21 135</b>	<b>2 551</b>	<b>523</b>	<b>24 209</b>
Gross lending (excl. fixed rate loans) as at 31.12.23 RM	12 853	838	113	13 804
Gross lending (excl. fixed rate loans) as at 31.12.23 CM	8 282	1 713	410	10 405
Unused credit and financial guarantees	2 502	154	15	2 671

Fixed rate lending, which is recognised at fair value, with changes in value via the income statement, is not included.



## LOSS PROVISIONS

## GROUP

	STAGE 1	STAGE 2	STAGE 3	31.12.24
Loss provisions for gross lending and off-balance sheet items	With expected loss over 12 months	Expected loss over the lifetime of the instrument	Expected loss over the lifetime of the instrument	Total
<b>Loss provisions per 01.01.24</b>	<b>33</b>	<b>55</b>	<b>133</b>	<b>220</b>
Provision for loss transferred to Stage 1	10	-4	-7	-2
Provision for loss transferred to Stage 2	-6	8	-2	0
Provision for loss transferred to Stage 3	-1	-5	6	0
New issued or purchased financial assets	7	2	0	10
Increase in deductions on existing loans	12	51	74	137
Reduction in deductions on existing loans	-23	-3	-11	-38
Excluded financial assets	-1	-14	-15	-30
Change due to established impairments ( <i>non-reversible losses</i> )	0	-2	-17	-20
<b>Loss provisions per 31.12.24</b>	<b>31</b>	<b>86</b>	<b>160</b>	<b>277</b>
Loss provisions per 31.12.24 RM	4	9	14	27
Loss provisions per 31.12.24 CM	27	76	146	250
Loss provisions, unused credit and financial guarantees	2	4	1	7

## GROUP

	STAGE 1	STAGE 2	STAGE 3	31.12.23
Loss provisions for gross lending and off-balance sheet items	With expected loss over 12 months	Expected loss over the lifetime of the instrument	Expected loss over the lifetime of the instrument	Total
<b>Loss provisions per 01.01.23</b>	<b>19</b>	<b>51</b>	<b>73</b>	<b>143</b>
Provision for loss transferred to Stage 1	9	-9	0	0
Provision for loss transferred to Stage 2	-3	7	-4	0
Provision for loss transferred to Stage 3	-1	-1	2	0
New issued or purchased financial assets	7	5	0	12
Increase in deductions on existing loans	13	33	81	127
Reduction in deductions on existing loans	-12	-15	-7	-35
Excluded financial assets	2	-15	-6	-19
Change due to established impairments ( <i>non-recoverable losses</i> )	0	0	-7	-8
<b>Loss provisions per 31.12.23</b>	<b>33</b>	<b>55</b>	<b>133</b>	<b>220</b>
Gross lending (excl. fixed rate loans) as at 31.12.23 RM	3	7	14	24
Gross lending (excl. fixed rate loans) as at 31.12.23 CM	30	49	119	198
Loss provisions, unused credit and financial guarantees	2	3	1	7

	PARENT BANK			
	STAGE 1	STAGE 2	STAGE 3	31.12.24
Loss provisions for gross lending and off-balance sheet items	Expected credit loss over 12 months	Expected loss over the lifetime of the instrument	Expected loss over the lifetime of the instrument	Total
<b>Loss provisions per 01.01.24</b>	<b>33</b>	<b>55</b>	<b>133</b>	<b>220</b>
Provision for loss transferred to Stage 1	10	-4	-7	-2
Provision for loss transferred to Stage 2	-6	7	-2	0
Provision for loss transferred to Stage 3	-1	-5	6	0
New issued or purchased financial assets	7	2	0	9
Increase in deductions on existing loans	12	50	74	136
Reduction in deductions on existing loans	-23	-4	-10	-37
Excluded financial assets	-1	-14	-15	-30
Change due to established impairments ( <i>non-reversible losses</i> )	0	-2	-17	-20
<b>Loss provisions per 31.12.24</b>	<b>31</b>	<b>85</b>	<b>161</b>	<b>276</b>
Loss provisions per 31.12.24 RM	3	8	14	25
Loss provisions per 31.12.24 CM	27	77	147	252
Loss provisions, unused credit and financial guarantees	2	4	1	7

	PARENT BANK			
	STAGE 1	STAGE 2	STAGE 3	31.12.23
Loss provisions for gross lending and off-balance sheet items	Expected credit loss over 12 months	Expected loss over the lifetime of the instrument	Expected loss over the lifetime of the instrument	Total
<b>Loss provisions per 01.01.23</b>	<b>18</b>	<b>50</b>	<b>73</b>	<b>141</b>
Provision for loss transferred to Stage 1	9	-9	0	0
Provision for loss transferred to Stage 2	-3	7	-4	0
Provision for loss transferred to Stage 3	-1	-1	2	0
New issued or purchased financial assets	7	4	0	11
Increase in deductions on existing loans	13	34	81	128
Reduction in deductions on existing loans	-11	-15	-7	-33
Excluded financial assets	2	-15	-6	-19
Change due to established impairments ( <i>non-recoverable losses</i> )	0	0	-7	-8
<b>Loss provisions per 31.12.23</b>	<b>33</b>	<b>55</b>	<b>133</b>	<b>220</b>
Gross lending (excl. fixed rate loans) as at 31.12.23 RM	1	7	14	22
Gross lending (excl. fixed rate loans) as at 31.12.23 CM	32	48	119	199
Loss provisions, unused credit and financial guarantees	2	3	1	7

## LOANS TO CUSTOMERS BROKEN DOWN BY INTERNAL RATING

### PARENT BANK

### GROUP

31.12.24

31.12.24

Stage 1	Stage 2	Stage 3	Total	Lending broken down by risk class and stage	Stage 1	Stage 2	Stage 3	Total
15 523	266		15 789	Very low risk	19 077	284	0	19 361
4 101	275		4 376	Low risk	4 238	280	0	4 518
2 731	1 403		4 134	Medium risk	2 854	1 455	0	4 308
619	470	0	1 089	High risk	622	495	0	1 118
182	518	0	700	Very high risk	184	538	0	722
		557	557	Defaulted and impaired	0	0	559	559
<b>23 155</b>	<b>2 932</b>	<b>557</b>	<b>26 644</b>	<b>Gross lending (excluding fixed interest lending)</b>	<b>26 974</b>	<b>3 053</b>	<b>559</b>	<b>30 586</b>

The risk groups are based on the Bank's PD model. Risk classes J and K constitute a commitment where there is objective evidence of loss, and comprises commitments in stage 3.

Low risk = risk classes A - D

Medium risk = risk classes E - G

High risk = risk classes H - K

### PARENT BANK

### GROUP

31.12.23

31.12.23

Stage 1	Stage 2	Stage 3	Total	Lending broken down by risk class and stage	Stage 1	Stage 2	Stage 3	Total
14 619	381		14 999	Very low risk	18 420	405		18 824
2 893	138		3 031	Low risk	3 068	150		3 218
3 062	1 287		4 349	Medium risk	3 175	1 354		4 529
291	291	6	588	High risk	297	329	6	632
227	497	2	726	Very high risk	230	509	2	741
		515	515	Defaulted and impaired			515	515
<b>21 091</b>	<b>2 593</b>	<b>523</b>	<b>24 208</b>	<b>Gross lending (excluding fixed interest lending)</b>	<b>25 189</b>	<b>2 746</b>	<b>523</b>	<b>28 459</b>

## NOTE 2.1.2 CENTRAL BANKS AND CREDIT INSTITUTIONS

For the balance sheet items 'Receivables from central banks' and 'Loans to and receivables from credit institutions', the Bank has applied the exception for low credit risk. The Bank's 'Cash and receivables from central banks' is exclusively linked to Norges Bank. Norges Bank is rated Aaa by Moody's and AAA/A-1 + from S&P and thus meets the standard presumption concerning low credit

risk. The Bank's 'Loans to and receivables from credit institutions' is exclusively linked to banks with a credit rating which meet the standard's presumption concerning low credit risk. The Bank has concluded that this, combined with LGD and low exposure, leads to insignificant loss provisions. Consequently, the Bank has not made any loss provisions linked to this balance sheet item.

### PARENT BANK

### GROUP

31.12.23	31.12.24		31.12.24	31.12.23
1 655	926	External rating S&P. AA-/A-1+	454	632
64	269	External rating S&P. A+/A-1+	269	64
135	271	External rating S&P. A/A-1	271	136
10	347	Unrated	347	10
<b>1 865</b>	<b>1 813</b>	<b>Total</b>	<b>1 340</b>	<b>842</b>

## CERTIFICATES AND BONDS: CLASSIFICATION OF ISSUERS BY SECTOR

PARENT BANK			GROUP	
31.12.23	31.12.24		31.12.24	31.12.23
685	597	State	647	831
1 766	1 708	Municipality	1 708	1 766
2 454	2 015	Credit institutions	2 115	2 555
51	61	Bank	61	51
46	57	Other	57	46
<b>5 002</b>	<b>4 438</b>	<b>Total</b>	<b>4 588</b>	<b>5 249</b>

## CERTIFICATES AND BONDS: CLASSIFICATION OF ISSUERS BY RATING

PARENT BANK			GROUP	
31.12.23	31.12.24		31.12.24	31.12.23
3 642	3 049	AAA	3 199	3 889
1 299	1 309	AA-/AA/AA+	1 309	1 299
25	25	A+/A	25	25
32	57	BBB-/BBB/BBB+	57	32
4	-	BB-/BB/BB+	-	4
<b>5 002</b>	<b>4 438</b>	<b>Total</b>	<b>4 588</b>	<b>5 249</b>

### NOTE 2.1.3 DEFAULTED AND DOUBTFUL COMMITMENTS

PARENT BANK			GROUP	
31.12.23	31.12.24		31.12.24	31.12.23
256	233	Defaulted commitments more than 90 days past due	234	256
267	324	Other doubtful commitments not in default	325	267
-133	-160	Impairments, stage 3	-160	-133
<b>390</b>	<b>397</b>	<b>Total net defaulted and doubtful commitments</b>	<b>399</b>	<b>390</b>

Other doubtful are loans and guarantees that are not in default. Commitments where payment relief has been registered are not recognised under other doubtful commitments, unless they are considered to be doubtful. Doubtful loans and guarantees are defined under alternative performance measures (APMs).

At the year-end, the Bank had non-recoverable losses of NOK 76 million (NOK 63 million) where the claim is still valid against the debtor. Non-recoverable losses for monitoring primarily concern customers in the retail market where the Bank has identified a loss, even though the loan has not been surrendered/deleted. The amount has not been recognised in the balance sheet and is not expected to be redeemed.

## NOTE 2.2 LIQUIDITY RISK

### GROUP AND PARENT BANK

The Board has established a liquidity management strategy, which specifies the purpose, management objectives and risk tolerance for liquidity risk management. The main objective of this strategy is to ensure that the Group has adequate liquidity management which helps to ensure that the Group is able to meet its payment obligations.

The liquidity strategy is reviewed annually by the Board. Particular emphasis has been placed on liquidity risk and new regulatory requirements for liquidity management within banks, which are gradually being implemented in the liquidity management process.

Liquidity risk is reduced by spreading borrowing over various markets, lenders, instruments and maturities.

In the management of the Group's liquidity risk, target requirements are used for liquidity indicator<sup>1</sup>, long-term funding ratio, deposit-to-loan ratio and requirements concerning liquidity buffer capital (LCR).

The Board has also stipulated that the proportion of long-term borrowing as a percentage of total borrowing must amount to at least 70%. As at 31.12.24, the proportion of long-term funding was 86.3% (78.1%), which is well above the target requirement.

To limit the Group's liquidity risk, the Bank has liquidity reserves in the form of cash, deposits in Norges Bank and other banks, liquid equity instruments, investments in money market funds, interest-bearing securities and unused drawing rights. Minimum requirements for liquidity buffer

levels are stipulated in the Bank's liquidity strategy. In recent years, the Group has gradually increased both the quality and level of its liquidity buffers. The Group's combined liquidity buffer capital is considered to be satisfactory.

The majority of the Group's liquidity reserves in the form of interest-bearing securities are invested in covered bonds and treasury and municipal bonds. The total duration of the fixed income portfolio is 1.35 years (1.74 years). The Group's total liquidity reserves (cash, bank deposits and interest-bearing securities) amounted to NOK 5.6 billion (NOK 6.1 billion), or 14.3% (16.5%) of the Group's total assets.

The deposit-to-loan ratio is a key parameter for the monitoring of liquidity risk, i.e. the proportion of gross lending to customers that is covered through deposits from customers. The Board has stipulated a minimum requirement of 60% for the deposit-to-loan ratio and this requirement was met throughout 2024.

Transfers to mortgage credit institutions represent an important source of funding, and provision of mortgages approved for transfer to mortgage credit institutions is afforded a high level of attention. At the end of 2024, the Group's covered bonds and senior debt amounted to NOK 7.9 billion (NOK 6.1 billion).

SpareBank 1 Helgeland is rated by Moody's. The Bank's rating is A2 with a stable outlook. Bonds issued by Helgeland Boligkreditt AS are rated at Aaa by Moody's.



## NOTE 2.2.1 LIQUIDITY RISK, REMAINING MATURITY

### GROUP

31.12.24

	From 0-3 months	From 3-12 months	From 1 year to 5 years	Over 5 years	Total incl. inte- rest
Deposits from customers and liabilities	25 374	590			25 964
Loans established through the issuing of securities	250	871	6 915	581	8 617
Subordinated loans/bonds				1 014	1 014
Financial derivatives, gross settlement (outflows) <sup>1)</sup>	27	81	324	53	485
<b>Total outgoing payments</b>	<b>25 651</b>	<b>1 542</b>	<b>7 239</b>	<b>1 648</b>	<b>36 080</b>
Loans to and receivables from credit institutions	1 391				1 391
Loans to and receivables from customers	3 880	256	1 786	34 343	40 265
Certificates and bonds	550	816	3 118	75	4 559
Total incoming payments	5 821	1 072	4 904	34 418	46 215
1) Financial derivatives, gross settlement (inflows)		68	217	43	328

Loan awards as at 31.12 were insignificant relative to the loan portfolio and have therefore not been incorporated.

### GROUP

31.12.23

	From 0-3 months	From 3-12 months	From 1 year to 5 years	Over 5 years	Total incl. inte- rest
Liabilities to credit institutions	0	331	0	0	331
Deposits from customers and liabilities	24 967	443			25 410
Loans established through the issuing of securities	234	911	4 861	538	6 544
Subordinated loans/bonds	0	0	0	1 014	1 014
Financial derivatives, gross settlement (outflows) <sup>1)</sup>	23	61	247	12	343
<b>Total outgoing payments</b>	<b>25 224</b>	<b>1 746</b>	<b>5 108</b>	<b>1 564</b>	<b>33 642</b>
Loans to and receivables from credit institutions	856				856
Loans to and receivables from customers	3 646	280	1 687	32 530	38 143
Certificates and bonds	325	1 113	3 608	180	5 226
<b>Total incoming payments</b>	<b>4 827</b>	<b>1 393</b>	<b>5 295</b>	<b>32 710</b>	<b>44 225</b>
1) Financial derivatives, gross settlement (inflows)	1	47	156	7	211

Loan awards as at 31.12 were insignificant relative to the loan portfolio and have therefore not been incorporated.

## PARENT BANK

31.12.24

	From 0-3 months	From 3-12 months	From 1 year to 5 years	Over 5 years	Total incl. interest
Liabilities to credit institutions	428				428
Deposits from customers and liabilities	25 374	590			25 964
Loans established through the issuing of securities		313	4 543		4 856
Subordinated loan				1 014	1 014
Financial derivatives, gross settlement (outflows) <sup>1)</sup>	14	41	112		167
<b>Total outgoing payments</b>	<b>25 816</b>	<b>944</b>	<b>4 655</b>	<b>1 014</b>	<b>32 429</b>
Loans to and receivables from credit institutions	1 391				1 391
Loans to and receivables from customers	3 079	253	1 688	30 138	35 158
Certificates and bonds	500	817	3 018	75	4 410
<b>Total incoming payments</b>	<b>4 970</b>	<b>1 070</b>	<b>4 706</b>	<b>30 213</b>	<b>40 959</b>
1) Financial derivatives, gross settlement (inflows)		35	87		122

## PARENT BANK

31.12.23

	From 0-3 months	From 3-12 months	From 1 year to 5 years	Over 5 years	Total incl. interest
Liabilities to credit institutions	0	331	0	0	331
Deposits from customers and liabilities	25 381	443	0	0	25 824
Loans established through the issuing of securities	130	0	2 816	0	2 946
Subordinated loan	0	0	0	1 014	1 014
Financial derivatives, gross settlement (outflows) <sup>1)</sup>	16	41	167	0	224
<b>Total outgoing payments</b>	<b>25 527</b>	<b>815</b>	<b>2 983</b>	<b>1 014</b>	<b>30 339</b>
Loans to and receivables from credit institutions	1 879	0	0	0	1 879
Loans to and receivables from customers	2 994	261	1 574	27 741	32 570
Certificates and bonds	275	1 006	3 508	180	4 969
<b>Total incoming payments</b>	<b>5 148</b>	<b>1 267</b>	<b>5 082</b>	<b>27 921</b>	<b>39 418</b>
1) Financial derivatives, gross settlement (inflows)	1	35	123	0	159

## UNUSED DRAWING FACILITIES

PARENT BANK			GROUP	
31.12.23	31.12.24		31.12.24	31.12.23
		Assets:		
2 372	2 616	Unused drawing rights, customers	3 031	2 748
299	307	Guarantees	307	299
477	1 027	Unused drawing rights, Helgeland Boligkreditt AS		
<b>3 148</b>	<b>3 950</b>	<b>Total unused drawing</b>	<b>3 338</b>	<b>3 047</b>
		Liabilities:		
900	900	Short-term drawing facility, 1 year	900	900
<b>900</b>	<b>900</b>	<b>Total liabilities</b>	<b>900</b>	<b>900</b>
66	110	Surplus liquidity in Norges Bank	110	66
<b>966</b>	<b>1 010</b>	<b>Total liabilities, including surplus liquidity</b>	<b>1 010</b>	<b>966</b>

Guarantee liabilities are presented in Note 40.

Matches and mismatches between maturity and interest rate on assets and liabilities are very important for risk management. It is unusual for banks to have a perfect match, because business transactions are often uncertain and cover many different types. An unmatched position could potentially generate a profit, but may also increase the risk of loss. The maturity of assets and liabilities, and the ability to replace them at an acceptable cost, is an important factor in determining the Group's liquidity and its exposure to interest rate changes.

The liquidity required in order to meet claims for settlement linked to guarantees and letters of credit is considerably less than the liability itself because the Group generally does not expect third parties to withdraw liquidity under the guarantee. The total outstanding contractual commitments to increase credits do not necessarily represent future claims for liquid assets, because many of these commitments will lapse or expire without being funded.

## NOTE 2.3 MARKET RISK

### GROUP AND PARENT BANK

The Board has adopted a market risk strategy that sets out limits and overall targets for the Group's market risk tolerance, as well as limits regarding interest rate, credit spread and share price risk. This strategy is reviewed annually. The Group has no active trading portfolios.

#### INTEREST RATE RISK

Interest rate risk is steered towards the desired level through interest binding on interest-bearing securities and borrowing, and through the use of interest rate swap agreements (interest rate swaps) in order to reduce interest rate risk linked to fixed interest rate exposures.

The Board has established a framework for the Group's overall interest rate risk, which is considered to be low.

The Bank has a relatively conservative strategy as regards investments in interest-bearing securities, with the primary aim of securing satisfactory liquidity reserves for the Bank.

#### SHARE RISK

The Bank's shareholdings are mainly strategically motivated through investments in subsidiaries, associated companies and product companies.

The market risk linked to these share investments is considered to be moderate.

Sensitivity analysis for market risk  
Interest-bearing securities - credit spread risk is the risk linked to the securities in the interest rate portfolio, the portfolio's duration and the issuers' creditworthiness. The Group's credit spread risk is calculated as the credit risk at the time of spreading with 100 basis points.

Shares – limits have been established for the Group's collective share risk calculated based on exposure, risk spreading and market liquidity. Risk exposure calculations are based on a general fall in

the share value of 30%. In addition, there is mark-up for risk spreading and market liquidity.

The Bank expresses the market risk as risk-adjusted capital. Calculated market risk lies within fixed limits, and an overall framework for market risk is included as a capital requirement in the Group's ICAAP.

The overarching interest rate risk is maintained at the desired level by an overall evaluation of balance sheet items and the use of interest rate swaps.

The Board of Directors has established a framework of NOK 30 million for total interest rate risk. At the year-end, a change in interest rate 2 percentage points would result in a decrease in earnings of +/- NOK 7.6 million. Exposure was within the framework throughout 2024.

#### CREDIT SPREAD RISK

The Bank assumes credit spread risk, primarily through the management of interest-bearing assets in the Bank's liquidity portfolio. The portfolio mainly consists of assets issued by Norwegian banks, mortgage credit institutions, municipalities, governments and non-financial institutions. The credit spread risk lies within the Board's agreed limits.

#### CURRENCY RISK

The Group only has minor financial positions and cash flows in foreign currencies in the balance sheet. These items are not considered to be significant. SpareBank 1 Helgeland is not a foreign exchange bank. Foreign currency loans are managed by an external foreign exchange bank. SpareBank 1 Helgeland has provided the necessary guarantees in favour of the foreign exchange bank.

The table in Note 2.3.1 summarises the Group's foreign exchange risk through guarantee liabilities relating to foreign currency loans managed by the foreign exchange bank concerned as at 31.12.24.

### NOTE 2.3.1 GUARANTEE LIABILITIES FOR FOREIGN CURRENCY LOANS

PARENT BANK				GROUP			
31.12.24				31.12.24			
Loan amount in currency		Guarantee liabilities in NOK		Loan amount in currency		Guarantee liabilities in NOK	
0.1		2 Swiss franc		0.1		2	
19		1 Japanese yen		19		1	
40		41 Swedish krona		40		41	
		44 Total guarantee liabilities in foreign exchange loans				44	

The Bank has a small portfolio of guaranteed foreign exchange loans; the equivalent value of which amounted to NOK 44 million as of 31.12.24. The portfolio is distributed over a range of customers where there is collateral in property and/or deposits. The credit risk in this portfolio is considered to be low.

PARENT BANK				GROUP			
31.12.23				31.12.23			
Loan amount in currency		Guarantee liabilities in NOK		Loan amount in currency		Guarantee liabilities in NOK	
0.2		2 Swiss franc		0.2		2	
19		1 Japanese yen		19		1	
20		20 Swedish krona		20		20	
		23 Total guarantee liabilities in foreign exchange loans				23	



## NOTE 2.3.2 INTEREST RATE RISK, REMAINING TIME TO INTEREST RATE ADJUSTMENT

## GROUP

31.12.24

	Up to 1 month	From 1-3 months	From 3 months to 1 year	From 1 year to 5 years	Over 5 years	Without interest rate change	Total
<b>Assets</b>							
Cash and receivables, central banks	124						124
Loans to and receivables on credit, without agreed maturity	1 340						1 340
Net loans to and receivables from customers		30 310		1 033			31 343
Bonds and certificates	946	3 516	127				4 589
Other assets, not interest-bearing (inc. swaps)						1 577	1 577
<b>Total assets</b>	<b>2 410</b>	<b>33 826</b>	<b>127</b>	<b>1 033</b>	<b>0</b>	<b>1 577</b>	<b>38 973</b>
<b>Liabilities and equity</b>							
Liabilities to credit institutions without agreed maturity	2						2
Deposits from customers and liabilities without agreed maturity		22 591					22 591
Deposits from customers and liabilities with agreed maturity		1 914	563				2 477
Loans established through the issuing of securities	1 809	4 607	1 915				8 331
Other liabilities, not interest-bearing (inc. swaps)						350	350
<b>Total liabilities</b>	<b>1 811</b>	<b>29 112</b>	<b>2 478</b>	<b>0</b>	<b>0</b>	<b>350</b>	<b>33 751</b>
Net interest sensitivity gap	599	4 714	-2 351	1 033	0	1 227	5 222

## CASH FLOW AND FAIR VALUE OF INTEREST RATE RISK

Cash flow interest rate risk is defined as the risk of future cash flows linked to individual financial asset and liabilities items fluctuating due to changes in market interest rates. The fair value of the interest rate risk is defined as the risk of the value of a financial asset or liabilities item fluctuating due to changes in market interest rates. In the case of both cash flow and the fair value of the interest rate risk, Bank is exposed to the effects of fluctuations in market interest rate levels. Unexpected changes in market interest rates can trigger increases in interest margins, but they can also be reduced or result in losses.

## GROUP

31.12.23

	Up to 1 month	From 1-3 months	From 3 months to 1 year	From 1 year to 5 years	Over 5 years	Without interest rate change	Total
<b>Assets</b>							
Cash and receivables, central banks	83	0	0	0	0	0	83
Loans to and receivables on credit, without agreed maturity	842	0	0	0	0	0	842
Net loans to and receivables from customers	0	28 231	0	964	0	0	29 195
Bonds and certificates	1 341	3 709	199	0	0	0	5 249
Other assets, not interest-bearing (inc. swaps)	0	0	0	0	0	1 491	1 491
<b>Total assets</b>	<b>2 266</b>	<b>31 940</b>	<b>199</b>	<b>964</b>	<b>0</b>	<b>1 491</b>	<b>36 860</b>
<b>Liabilities and equity</b>							
Liabilities to credit institutions with agreed maturity	20	0	0	0	0	0	20
Deposits from customers and liabilities without agreed maturity	0	300	0	0	0	0	300
Deposits from customers and liabilities with agreed maturity	0	22 502	0	0	0	0	22 502
Loans established through the issuing of securities	0	823	1 358	0	0	0	2 181
Other liabilities, not interest-bearing (inc. swaps)	630	4 382	1 439	0	0	0	6 451
Total liabilities	0	0	0	0	0	355	355
<b>Net interest sensitivity gap</b>	<b>650</b>	<b>28 007</b>	<b>2 797</b>	<b>0</b>	<b>0</b>	<b>355</b>	<b>31 809</b>
	1 616	3 933	-2 598	964	0	1 136	5 051

## PARENT BANK

31.12.24

	Up to 1 month	From 1-3 months	From 3 months to 1 year	From 1 year to 5 years	Over 5 years	Without interest rate change	Total
<b>Assets</b>							
Cash and receivables, central banks	124						124
Loans to and receivables on credit, without agreed maturity	1 813						1 813
Net loans to and receivables from customers		26 370		1 033			27 403
Bonds and certificates	946	3 365	127				4 438
Other assets, not interest-bearing (inc. swaps)						2 127	2 127
<b>Total assets</b>	<b>2 883</b>	<b>29 735</b>	<b>127</b>	<b>1 033</b>	<b>0</b>	<b>2 127</b>	<b>35 905</b>
<b>Liabilities and equity</b>							
Liabilities to credit institutions without agreed maturity	414						414
Deposits from customers and liabilities without agreed maturity		22 603					22 603
Deposits from customers and liabilities with agreed maturity		1 914	563				2 477
Loans established through the issuing of securities	501	3 290	980				4 771
Other liabilities, not interest-bearing (inc. swaps)						442	442
<b>Total liabilities</b>	<b>915</b>	<b>27 807</b>	<b>1 543</b>	<b>0</b>	<b>0</b>	<b>442</b>	<b>30 707</b>
Net interest sensitivity gap	1 968	1 928	-1 416	1 033	0	1 684	5 197

## PARENT BANK

31.12.23

	Up to 1 month	From 1-3 months	From 3 months to 1 year	From 1 year to 5 years	Over 5 years	Without interest rate change	Total
<b>Assets</b>							
Cash and receivables, central banks	83	0	0	0	0	0	83
Loans to and receivables on credit, without agreed maturity	1 865	0	0	0	0	0	1 865
Net loans to and receivables from customers	0	23 990	0	964	0	0	24 954
Bonds and certificates	1 341	3 560	101	0	0	0	5 002
Other assets, not interest-bearing (inc. swaps)	0	0	0	0	0	1 975	1 975
<b>Total assets</b>	<b>3 289</b>	<b>27 550</b>	<b>101</b>	<b>964</b>	<b>0</b>	<b>1 975</b>	<b>33 879</b>
<b>Liabilities and equity</b>							
Liabilities to credit institutions without agreed maturity	16	0	0	0	0	0	16
Liabilities to credit institutions with agreed maturity	0	300	0	0	0	0	300
Deposits from customers and liabilities without agreed maturity	0	823	1 358	0	0	0	2 181
Deposits from customers and liabilities with agreed maturity	0	22 976	0	0	0	0	22 976
Loans established through the issuing of securities	130	1 897	986	0	0	0	3 013
Other liabilities, not interest-bearing (inc. swaps)	0	0	0	0	0	364	364
<b>Total liabilities</b>	<b>146</b>	<b>25 996</b>	<b>2 344</b>	<b>0</b>	<b>0</b>	<b>364</b>	<b>28 850</b>
Net interest sensitivity gap	3 143	1 554	-2 243	964	0	1 611	5 029

## NOTE 3. SENSITIVITY ANALYSIS FOR CHANGES IN MARKET PRICES

## GROUP

31.12.24

	Effect on profit	Effect Equity
Interest +/- 2% points	-7.64	-0.03%
Total	-7.64	-0.03%

The Group's total interest rate risk consists of all investments in interest-bearing financial instruments and interest rate risk linked to the Bank's portfolio. Exposure of the Group's interest rate risk as of 31.12.24 was NOK -7.6 million (NOK 14.6 million). The target requirement is for the Group's overall interest rate risk concerning interest-bearing instruments to not exceed NOK 30 million. Limit for interest rate risk: interest rate exposure (parallel shift in the interest rate curve of 2%). The effect on equity and profit is after tax.

## GROUP

31.12.23

	Effect on profit	Effect Equity
Interest +/- 2% points	14.6	0.06%
Total	14.6	0.06%

## NOTE 4. SEGMENT INFORMATION

### PARENT BANK

### GROUP

31.12.24

31.12.24

RM	CM	Unallo- cated	Total		RM	CM	Unallo- cated	Total
356	371	258	985	Net interest income	435	373	204	1 012
19	14	142	175	Net commission income	19	14	142	175
0	0	107	107	Total other income and net income from financial investments			86	86
198	88	146	432	Operating costs	200	87	140	427
8	96	-3	101	Losses on loans	8	96	-2	102
<b>169</b>	<b>201</b>	<b>364</b>	<b>734</b>	<b>Net income before tax</b>	<b>246</b>	<b>204</b>	<b>293</b>	<b>743</b>
16 683	10 994	0	27 677	Loans to customers	20 730	10 888	0	31 618
-25	-250	0	-275	Impairments	-25	-250	0	-275
0	0	8 503	8 503	Other assets	0	0	7 630	7 630
16 658	10 744	8 503	35 905	Total assets per segment	20 705	10 638	7 630	38 973
16 403	8 677	0	25 080	Deposits from and liabilities to customers	16 403	8 665	0	25 068
0	7	0	7	Impairments	0	6	0	6
0	0	10 818	10 818	Other liabilities and equity	0	0	13 899	13 899
<b>16 403</b>	<b>8 684</b>	<b>10 818</b>	<b>35 905</b>	<b>Total liabilities and equity per segment</b>	<b>16 403</b>	<b>8 671</b>	<b>13 899</b>	<b>38 973</b>

### PARENT BANK

### GROUP

31.12.23

31.12.23

RM	CM	Unallo- cated	Total		RM	CM	Unallo- cated	Total
426	381	155	962	Net interest income	484	383	117	984
21	14	120	155	Net commission income	21	14	121	156
0	0	53	53	Total other income and net income from financial investments	0	0	24	24
188	85	142	415	Operating costs	188	85	141	414
3	98	0	101	Losses on loans	2	98	0	100
<b>256</b>	<b>212</b>	<b>186</b>	<b>654</b>	<b>Net income before tax</b>	<b>315</b>	<b>214</b>	<b>121</b>	<b>650</b>
14 662	10 511	0	25 173	Loans to customers	19 022	10 401	0	29 423
-21	-198	0	-219	Impairments	-22	-198	0	-220
0	0	8 925	8 925	Other assets	0	0	7 657	7 657
14 641	10 313	8 925	33 879	Total assets per segment	19 000	10 203	7 657	36 860
15 237	9 919	0	25 156	Deposits from and liabilities to customers	15 237	9 446	0	24 683
0	7	0	7	Impairments	0	7	0	7
0	0	8 716	8 716	Other liabilities and equity	0	0	12 170	12 170
<b>15 237</b>	<b>9 926</b>	<b>8 716</b>	<b>33 879</b>	<b>Total liabilities and equity per segment</b>	<b>15 237</b>	<b>9 453</b>	<b>12 170</b>	<b>36 860</b>

The Group has defined its geographical area as a single segment - Helgeland. The Group's exposure to credit risk is mainly concentrated on this area. Helgeland is the home region of the Parent bank, which is also the Group's operating company. The Group has also divided the banking operations into two segments: the retail market and the corporate market. Income and expenses not directly allocated to these segments are presented as unallocated.

## NOTE 5. NET INTEREST AND CREDIT COMMISSION INCOME

PARENT BANK			GROUP	
2023	2024		2024	2023
		Interest from financial instruments at amortised cost		
76	111	Interest on receivables from credit institutions	54	40
796	924	Interest on loans to customers	932	803
<b>872</b>	<b>1 035</b>	<b>Total interest from financial instruments at amortised cost</b>	<b>986</b>	<b>843</b>
		Interest from financial instruments at fair value via the income statement		
30	30	Interest on loans to customers (fixed-rate loans)	30	30
228	237	Interest on certificates and bonds	242	232
<b>258</b>	<b>267</b>	<b>Total interest from financial instruments recognised at fair value via the income statement</b>	<b>272</b>	<b>262</b>
		Interest from financial instruments recognised at fair value via other comprehensive income		
681	803	Interest on loans to customers (loans that can be transferred to the mortgage credit institution)	1 040	891
<b>681</b>	<b>803</b>	<b>Total interest from financial instruments at fair value via other comprehensive income</b>	<b>1 040</b>	<b>891</b>
<b>1 811</b>	<b>2 104</b>	<b>Total interest income and other similar income</b>	<b>2 298</b>	<b>1 997</b>
		<b>Interest expenses:</b>		
658	857	Deposits from customers at amortised cost	857	658
13	27	Deposits from customers at fair value	27	13
14	25	Interest on deposits and loans from credit institutions	25	14
122	159	Debt securities at amortised cost	288	266
25	36	Debt securities at fair value	73	42
<b>832</b>	<b>1 104</b>	<b>Total interest expenses</b>	<b>1 270</b>	<b>993</b>
17	15	Deposit guarantee/emergency fund	16	19

### NOTE 5.1 INTEREST ON CERTAIN BALANCE SHEET ITEMS (AVERAGE INTEREST RATE IN %)

PARENT BANK			GROUP	
31.12.23	31.12.24	Average interest rate	31.12.24	31.12.23
		<b>Assets</b>		
4.2%	5.3%	Loans to and receivables from credit institutions	4.9%	3.6%
<b>5.9%</b>	6.7%	Loans to customers	6.6%	<b>5.8%</b>
4.4%	5.2%	Certificates and bonds	5.1%	4.2%
		<b>Liabilities</b>		
4.6%	3.7%	Liabilities to credit institutions	5.3%	4.6%
2.6%	3.5%	Deposits from customers	3.5%	2.6%
<b>4.5%</b>	6.4%	Debt securities	6.2%	<b>4.5%</b>



## NOTE 5.2 AVERAGE VOLUME OF CERTAIN BALANCE SHEET ITEMS

PARENT BANK			GROUP	
31.12.23	31.12.24	Average volume	31.12.24	31.12.23
		<b>Assets</b>		
1 819	2 078	Loans to and receivables from credit institutions	1 076	1 112
<b>25 453</b>	26 227	Loans to customers	30 529	<b>29 949</b>
5 239	4 533	Certificates and bonds	4 732	5 455
		<b>Liabilities</b>		
<b>309</b>	689	Liabilities to credit institutions	284	<b>309</b>
25 519	25 173	Deposits from customers	25 173	25 132
<b>2 720</b>	3 049	Debt securities	6 321	<b>6 507</b>

## NOTE 6 COMMISSION INCOME AND INCOME FROM BANKING SERVICES

PARENT BANK			GROUP	
2023	2024		2024	2023
<b>6</b>	6	Guarantee provisions *	6	<b>6</b>
19	32	Commission linked to lending transferred to credit institutions	32	19
<b>96</b>	99	Fee income, payment mediation	99	<b>96</b>
50	54	Fee income insurance (non-life, life, savings and pension)	54	50
<b>171</b>	<b>191</b>	<b>Total commission income and income from banking services</b>	<b>191</b>	<b>171</b>

\*) Guarantee commission made available to customers upon completion of construction contracts.

## NOTE 7 COMMISSION EXPENSES AND COSTS ATTRIBUTABLE TO BANKING SERVICES

PARENT BANK			GROUP	
2023	2024		2024	2023
16	16	Payment mediation services	16	16
<b>16</b>	<b>16</b>	<b>Total commission costs and costs attributable to banking services</b>	<b>16</b>	<b>16</b>
<b>155</b>	<b>175</b>	<b>Net commission income</b>	<b>175</b>	<b>155</b>

## NOTE 8. NET INCOME FROM FINANCIAL ASSETS AND LIABILITIES

PARENT BANK			GROUP	
2023	2024		2024	2023
7	0	Unrealised fall in value of interest-bearing securities	0	7
-3	-7	Realised gain/loss on interest-bearing securities	-2	1
-6	9	Net gain/loss on shares	9	-6
57	64	Share dividends	43	28
-1	22	Share of earnings from joint controlled enterprises	22	-1
5	10	Unrealised change in value, fixed interest loans at fair value	10	5
-17	0	Unrealised change in value of deposits and derivatives	-4	-19
<b>42</b>	<b>98</b>	<b>Total net income from financial instruments</b>	<b>77</b>	<b>15</b>

## NOTE 9. OTHER OPERATING INCOME

PARENT BANK			GROUP	
2023	2024		2024	2023
0	3	Operating income, real property	8	9
11	6	Operating income (including management fees, mortgage credit institution)	0	0
0	0	Gains on sale of real property and movables	0	0
<b>11</b>	<b>9</b>	<b>Total other operating income</b>	<b>8</b>	<b>9</b>

## NOTE 10. OPERATING COSTS

PARENT BANK			GROUP	
2023	2024		2024	2023
185	200	Salaries and National Insurance costs (Note 11)	201	186
38	43	IT costs	43	38
13	9	Marketing	9	13
25	22	Depreciation	32	33
20	25	Impairments	1	2
75	75	Alliance expenses	75	75
9	11	Purchased services	11	11
50	47	Other operating costs	55	56
<b>415</b>	<b>432</b>	<b>Total ordinary operating costs</b>	<b>427</b>	<b>414</b>

## NOTE 11. SALARIES AND NATIONAL INSURANCE COSTS

PARENT BANK			GROUP	
2023	2024		2024	2023
131	139	Salaries and fees	140	132
31	34	Employer's National Insurance contributions	34	31
16	18	Pension costs, defined benefit plans (Note 12)	18	16
7	8	Other personnel costs	8	7
<b>185</b>	<b>200</b>	<b>Total salaries and National Insurance costs</b>	<b>201</b>	<b>186</b>
165	169	Number of employees, FTEs as at 31.12.	169	165
161	167	Average number of employees, FTEs	167	161

## NOTE 12. PENSION COSTS AND PENSION LIABILITIES

SpareBank 1 Helgeland is required to have an occupational pension scheme and the Bank fulfils the applicable requirements set out in the relevant legislation. None of the subsidiaries have pension schemes or employees. The pension schemes include:

### DEFINED BENEFIT SCHEME INVESTED IN A LIFE INSURANCE COMPANY

All of the Bank's employees (who according to pension legislation could be transferred from defined benefit pension plan) were transferred to a defined contribution pension with effect from 01.03.16. Those who remain in the defined benefit plan are members who, under the current rules cannot be transferred.

The scheme covers 0 (0) employees, as well as 13 (13) people who are receiving an ongoing pension from

the scheme. The pension scheme entitles employees to future pension disbursements of 66% of their salary upon retirement, subject to a maximum of 12 National Insurance basic amounts (G).

### DEFINED CONTRIBUTION SCHEME

With effect from 01.03.16, all employees (who could be transferred) were transferred to a defined contribution scheme. Contributions to the scheme amount to 7% for salaries between 0-7.1G and 25.1% for salaries between 7.1G and 12G. The pension scheme also includes a disability pension.

The defined contribution scheme now includes 182 (171) active and 11 (10) disabled persons.

### CONTRACTUAL PENSION

The Bank and the finance industry in general have entered into an agreement concerning a contractual pension (AFP). (No one who is still a member of the old scheme has been capitalised).

### SENIOR EXECUTIVE SCHEME

See the remuneration report on the Company's website.

## NOTE 12.1 LIABILITIES AND EXPENSES CONCERNING PENSION SCHEMES

PARENT BANK			GROUP	
31.12.24			31.12.24	
Expense	Liability		Liability	Expense
0	15	Defined benefit scheme	15	0
16	0	Defined contribution scheme	0	16
3	0	Contractual pension (AFP)	0	3
<b>18</b>	<b>15</b>	<b>Total liabilities and expenses concerning pension schemes</b>	<b>15</b>	<b>18</b>

PARENT BANK			GROUP	
31.12.23			31.12.23	
Expense	Liability		Liability	Expense
0	17	Defined benefit scheme	17	0
14	0	Defined contribution scheme	0	14
2	0	Contractual pension (AFP)	0	2
<b>16</b>	<b>17</b>	<b>Total liabilities and expenses concerning pension schemes</b>	<b>17</b>	<b>16</b>

## NOTE 12.2 RISKS ASSOCIATED WITH CHANGES IN ECONOMIC ASSUMPTIONS

The company is exposed to the following risks through the defined benefit pension schemes:

### INVESTMENT VOLATILITY

Pension obligations are calculated using a discount interest rate determined on the basis of bond interest rates. If investment of the pension schemes' assets produces a lower return than the bond rate, a deficit is created.

### CHANGE IN THE BOND INTEREST RATE

A reduction in bond interest rates will increase the obligations in the pension schemes. This will be partly offset by an increase in the return on bond investments.

### LIFE EXPECTANCY

The payment liability applies for the remaining life of the scheme's members. An increase in life expectancy will lead to an increase in the liability relating to the scheme. This is particularly important in the case of the Norwegian scheme, where inflation adjustments result in greater sensitivity to changes in life expectancy.

## NOTE 12.3 ECONOMIC ASSUMPTIONS

PARENT BANK			GROUP	
2023	2024	Assumptions	2024	2023
3.70%	3.30%	Discount interest rate	3.30%	3.70%
3.70%	3.30%	Return on pension funds	3.30%	3.70%
3.75%	3.50%	Long-term pay growth	3.50%	3.75%
3.50%	1.90%	Adjustment of ongoing pensions	1.90%	3.50%
3.50%	3.25%	Adjustment of the National Insurance basic amount	3.25%	3.50%
19.10%	19.10%	Employer's National Insurance contributions (inc. tax) - rate	19.10%	19.10%
0.00%	0.00%	Employees wishing to utilise contractual pension (AFP)	0.00%	0.00%
0.00%	0.00%	Annual percentage retirement for working	0.00%	0.00%
64	65 years	Average age	65 years	64

Economic assumptions used for calculating pension costs and liabilities for defined benefit scheme

In accordance with IAS 19, the discount interest rate for pension obligations will be set to the interest rate on corporate bonds with high creditworthiness, or to the government bond interest rate if there is no deep market for corporate bonds with high creditworthiness. The Norwegian market for covered bonds is considered to be such that it can be used as a basis in the calculation of the discount interest rate.

## NOTE 12.4 PENSION OBLIGATION, DEFINED BENEFIT SCHEME

PARENT BANK					GROUP					
31.12 2020	31.12 2021	31.12 2022	31.12 2023	31.12 2024		31.12 2024	31.12 2023	31.12 2022	31.12 2021	31.12 2020
					Change in pension obligation:					
31	31	31	27	26	Obligation at start of year	26	27	31	31	31
0	0	0	0	0	Service cost	0	0	0	0	0
1	0	0	1	1	Interest expense on pension liabilities	1	1	0	0	1
0	0	0	0	0	New agreements, contractual pension (AFP)	0	0	0	0	0
1	1	-3	0	-2	Actuarial losses/gains	-2	0	-3	1	1
-1	-1	-1	-1	-2	Pension disbursements	-2	-1	-1	-1	-1
31	31	27	26	23	Defined benefit obligation at end of year	23	26	27	31	31
					Change in plan assets:					
11	11	11	11	11	Plan assets at start of year	11	11	11	11	11
0	0	0	0	0	Return on pension funds	0	0	0	0	0
0	0	1	0	0	Actuarial losses/gains	0	0	1	0	0
0	0	0	0	0	Administration expenses	0	0	0	0	0
0	0	0	0	0	Contributions	0	0	0	0	0
0	0	0	0	0	Pension disbursements	0	0	0	0	0
11	11	12	11	12	Plan assets at end of year	12	11	12	11	11
					Reconciliation - capitalised pension obligation					
31	31	27	26	23	Obligation at end of period	23	26	27	31	31
11	11	12	11	12	Plan assets at end of year	12	11	12	11	11
-20	-20	-15	-15	-11	Net pension obligation	-11	-15	-15	-20	-20
-4	-3	-2	-2	-4	Employer's contributions on net pension obligation	-4	-2	-2	-4	-4
-24	-23	-17	-17	-15	Net pension obligation, including employer's contributions	-15	-17	-17	-23	-24
0	0	0	0	0	Unrecognised effect of estimate variances	0	0	0	0	0
0	0	0	0	0	Estimate variances, employer's contributions	0	0	0	0	0
-24	-23	-17	-17	-15	Balance sheet liabilities (incl. AGA)	-15	-17	-17	-23	-24

## NOTE 13 – ESTIMATE VARIANCES, DEFINED BENEFIT SCHEME

PARENT BANK				GROUP	
2023	2024			2024	2023
1	-1	+ Actuarial loss/(gain) on defined benefit obligation from economic assumptions		-1	1
-1	1	- Estimate variances incorporated into OCI		1	-1
<b>0</b>	<b>0</b>	<b>Estimate variance at end of year</b>		<b>0</b>	<b>0</b>



## NOTE 14. NET PENSION EXPENSE, DEFINED BENEFIT SCHEME, DEFINED CONTRIBUTION SCHEME AND CONTRACTUAL PENSION

PARENT BANK			GROUP	
2023	2024		2024	2023
16	18	Pension accrual	18	16
3	3	+ Employer's contributions	3	3
<b>19</b>	<b>21</b>	<b>Net pension expense</b>	<b>21</b>	<b>19</b>

## NOTE 15. AUDIT FEES AND COSTS FOR ASSISTANCE FROM EXTERNAL AUDITOR

PARENT BANK			GROUP	
2023	2024	Audit expenses	2024	2023
1.2	1.3	Statutory audit	1.7	1.4
1.0	0.7	Other services, attestation and assistance project	0.8	1.1
<b>2.2</b>	<b>2.0</b>	<b>Total audit</b>	<b>2.5</b>	<b>2.5</b>

PricewaterhouseCoopers AS is the Group's appointed auditor.

## NOTE 16. IMPAIRMENTS ON COMMITMENTS

PARENT BANK			GROUP	
2023	2024	Impairments	2024	2023
15	-6	Change in impairments in stage 1 during the period	-6	14
4	32	Change in impairments in stage 2 during the period	32	4
59	15	Change in impairments in stage 3 during the period	15	58
26	66	Non-recoverable losses during the period	66	27
-3	-5	Recoveries from non-recoverable losses during previous periods	-5	-3
<b>101</b>	<b>101</b>	<b>Recognised impairments on commitments</b>	<b>102</b>	<b>100</b>

## NOTE 17. TAX COST

PARENT BANK			GROUP	
2023	2024	Tax for the year	2024	2023
149	151	Tax payable	158	155
6	7	Over-/under-allocated in previous years	7	6
0	2	Excess/shortfall in change in deferred tax from previous years	2	0
-1	5	Change in deferred tax (Note 29)	5	-1
<b>155</b>	<b>165</b>	<b>Tax cost for the year</b>	<b>172</b>	<b>160</b>
<b>Specification of accounting result before tax and taxable income for the year</b>				
654	734	Accounting net income before tax	743	650
-54	-110	Permanent differences	-90	-54
0	0	Use of previous losses carried forward	0	0
-3	-20	Change in temporary differences (Note 29)	-20	24
<b>597</b>	<b>604</b>	<b>Taxable income</b>	<b>634</b>	<b>620</b>
<b>Reconciliation tax</b>				
654	734	Accounting net income before tax	743	650
164	184	Tax calculated using the enterprise's weighted average tax rate	186	163
Tax effect of:				
-14	-28	Tax-free income	-22	-9
6	9	Changes from previous year	9	6
0	0	Non-deductible expenses	0	0
<b>155</b>	<b>165</b>	<b>Tax cost in the income statement</b>	<b>172</b>	<b>160</b>

## NOTE 17.1 LEASES

PARENT BANK			GROUP	
31.12.23	31.12.24		31.12.24	31.12.23
		<b>Usufruct</b>		
33	76	Carrying amount as at 01.01	9	11
58	0	Additions	0	0
0	0	-Disposals	0	0
1	94	Other changes	1	1
92	170	Carrying amount at end of period	10	12
16	20	Depreciation during the period	4	3
<b>76</b>	<b>150</b>	<b>Carrying amount, usufruct at end of period</b>	<b>7</b>	<b>9</b>
49	92	Liability as at 01.01	23	26
58	0	New agreements during the period	0	0
-20	-24	Rent payments during the period - instalments	-4	-5
4	4	Interest	1	1
1	94	Other changes	1	1
<b>92</b>	<b>166</b>	<b>Total lease obligations at end of period</b>	<b>20</b>	<b>23</b>
		<b>Income statement</b>		
16	20	Depreciation	4	3
4	4	Interest	1	1
<b>20</b>	<b>24</b>	<b>Total</b>	<b>5</b>	<b>4</b>

Usufruct and liability are capitalised under: 1) Other assets, 2) Other liabilities

IFRS 16 presupposes that there is no longer a distinction between operational and financial leasing, because both types of agreement transfer the right of use to a specific asset from the lessor to the lessee for a specific period. For lessors, the regulations of IAS 17 are largely continued. The standard became effective from 01.01.19. The standard has the effect that leases (mainly branch premises) are included in the balance sheet. The effects on the Group's profits for 2024 amount to an accounting depreciation of NOK 4 million and interest costs of NOK 1 million. The liability has also been reduced by NOK 3 million.

## NOTE 17.2 MATURITY STRUCTURE OF LEASES, IFRS 16

PARENT BANK			GROUP	
2023	2024	Maturity structure	2024	2023
24	25	Up to 1 year	5	5
24	24	1-2 years	4	45
24	16	2-3 years	2	5
16	16	3-4 years	3	2
6	15	4-5 years	3	2
2	128	More than 5 years	13	1
<b>96</b>	<b>224</b>	<b>Total maturity structure</b>	<b>30</b>	<b>19</b>

## NOTE 18. EARNINGS PER EQUITY CERTIFICATE AND OWNERSHIP RATIO

PARENT BANK			GROUP	
2023	2024	Earnings per equity certificate	2024	2023
500	569	Profit from ordinary operations after tax	571	490
-21	-22	Interest, subordinated bonds	-22	-21
479	547	Profit (exc. interest on subordinated bonds)	549	469
79.9%	79.9%	Equity certificate holders' share as at 01.01	79.9%	79.9%
382	437	Equity certificate holders' share of earnings in NOK million	438	374
<b>14.2</b>	<b>16.2</b>	<b>Earnings per equity certificate, in NOK</b>	<b>16.2</b>	<b>13.9</b>
<b>14.2</b>	<b>16.2</b>	<b>Diluted earnings per equity certificate, in NOK</b>	<b>16.2</b>	<b>13.9</b>
<b>Dividend basis</b>			<b>2024</b>	<b>2023</b>
Net profit			569	500
Change in fund for valuation differences			-22	7
Interest hybrid capital			-6	21
<b>Dividend basis</b>			<b>540</b>	<b>485</b>
<b>Calculation of equity certificate ratio (parent bank)</b>			<b>2024</b>	<b>2023</b>
Equity share capital			258	266
Equalisation fund			1 831	1 626
Share premium reserve			1 505	1 505
Fund for unrealised gains			18	14
Other equity				
<b>Total equity certificate holders' capital</b>			<b>3 612</b>	<b>3 411</b>
Primary capital			876	824
Gift funds			28	31
Fund for unrealised gains			4	4
Other equity			0	
<b>Total primary capital</b>			<b>908</b>	<b>859</b>
Allocation to gift foundation			52	70
Provision for dividends			228	291
<b>Equity excluding hybrid capital</b>			<b>4 800</b>	<b>4 631</b>
Equity certificate ratio			79.9%	79.9%
<b>Time-weighted equity certificate ratio available</b>			<b>79.9%</b>	<b>79.9%</b>

## NOTE 19. CASH AND RECEIVABLES, CENTRAL BANKS

PARENT BANK			GROUP	
31.12.23	31.12.24		31.12.24	31.12.23
17	14	Cash reserve	14	17
66	110	Deposits at Norges Bank	110	66
<b>83</b>	<b>124</b>	<b>Total cash and receivables in central banks</b>	<b>124</b>	<b>83</b>

See Note 2.1.2

## NOTE 20. LOANS TO AND RECEIVABLES FROM CREDIT INSTITUTIONS

PARENT BANK			GROUP	
31.12.23	31.12.24		31.12.24	31.12.23
842	1 340	Loans to and receivables in credit institutions*	1 340	842
1 023	473	Credit, Helgeland Boligkreditt AS**	0	0
<b>1 865</b>	<b>1 813</b>	<b>Total loans to and receivables in credit institutions</b>	<b>1 340</b>	<b>842</b>

\*) Loans to and receivables in credit institutions are entirely subject to floating rates of interest. See also Note 2.1.2

\*\*) Helgeland Boligkreditt AS is a wholly owned subsidiary of SpareBank 1 Helgeland

## NOTE 21. LOANS TO AND RECEIVABLES FROM CUSTOMERS

PARENT BANK			GROUP	
31.12.23	31.12.24	Loans by receivable type, nominal principal	31.12.24	31.12.23
561	657	Overdraft and working capital facilities	657	561
1 758	1 870	Flexible loans	2 626	2 373
425	347	Building loans	347	425
8 617	8 830	Instalment loans	8 080	8 248
963	1 056	Fixed-interest loans to and receivables from customers	1 056	963
12 737	14 845	Mortgages at fair value	18 772	16 730
25 061	27 605	Loans to customers	31 538	29 300
-87	-114	Stages 1 and 2 (collective impairments)	-116	-88
-132	-160	Stage 3 (collective and individual impairments)	-160	-132
24 842	27 331	Loans to customers after impairments	31 262	29 080
112	72	Accrued interest and amortisation	80	123
<b>24 954</b>	<b>27 403</b>	<b>Net loans to and receivables from customers</b>	<b>31 342</b>	<b>29 203</b>

## INFORMATION ON COLLATERAL

The Bank uses collateral to reduce risk depending on the market and the type of transaction concerned. Collateral can, for example, take the form of physical security or collateral, guarantees, deposits or set-off agreements. Physical collateral will normally be secured and can consist of housing, buildings or inventories. The valuation of collateral is based on the going concern assumption. Account is taken of factors that could affect the value of the collateral, impairments or easements. Hedged items in the private market mainly consist of property. The Bank uses fixed reduction rates ranging from 20 to 50% based on the types of collateral. A statement is presented below of collateral coverage distributed broken down according to loans within the Retail Market and Corporate Market, including accrued interest. Collateral coverage as a percentage indicates the adjusted collateral value expressed as a percentage of lending.



## PARENT BANK

## GROUP

31.12.24

31.12.24

CM	RM	Total loans	Collateral coverage in percent	Total loans	CM	RM
970	103	1 073	Under 40%	1 073	970	103
997	192	1 189	40% - 60%	1 190	997	193
1 922	731	2 653	60% - 80%	2 675	1 922	753
2 419	5 403	7 822	80% - 100%	8 011	2 420	5 591
1 862	6 260	8 122	100% - 120%	9 348	1 877	7 471
2 611	4 135	6 746	Over – 120%	9 241	2 640	6 601
10 781	16 824	27 605	Total loans	31 538	10 826	20 712

## PARENT BANK

## GROUP

31.12.23

31.12.23

CM	RM	Total loans	Collateral coverage in percent	Total loans	CM	RM
736	130	866	Under 40%	867	736	131
1 160	237	1 397	40% - 60%	1 408	1 160	248
1 272	659	1 931	60% - 80%	1 950	1 272	678
2 039	4 223	6 262	80% - 100%	6 540	2 101	4 440
2 340	5 269	7 609	100% - 120%	9 106	2 358	6 748
2 924	4 072	6 996	Over – 120%	9 659	2 749	6 680
10 471	14 590	25 061	Total loans	29 300	10 376	18 925

## NOTE 21.1 GEOGRAPHICAL DISTRIBUTION OF GROSS LENDING

## PARENT BANK

## GROUP

31.12.24

% share

31.12.24

% share

22 193	80.2%	Helgeland	25 326	80.1%
5 423	19.6%	Rest of Norway	6 221	19.7%
60	0.2%	International	71	0.2%
27 677	100%	Total gross lending	31 619	100%

## PARENT BANK

## GROUP

31.12.23

% share

31.12.23

% share

21 018	83.5%	Helgeland	24 370	82.8%
4 106	16.3%	Rest of Norway	4 991	17.0%
49	0.2%	International	62	0.2%
25 173	100%	Total gross lending	29 423	100%

## NOTE 21.2 DISTRIBUTION OF LOANS BETWEEN THE RETAIL MARKET AND CORPORATE MARKET

PARENT BANK			GROUP	
31.12.24			31.12.24	
Retail market	Corporate market		Retail market	Corporate market
19	919	Overdraft and working capital facilities	19	919
1 835	35	Flexible loans	2 584	42
72	213	Building loans	72	213
14 757	9 827	Repayment loans and flexible loans	18 056	9 714
<b>16 683</b>	<b>10 994</b>	<b>Gross lending to customers</b>	<b>20 731</b>	<b>10 888</b>

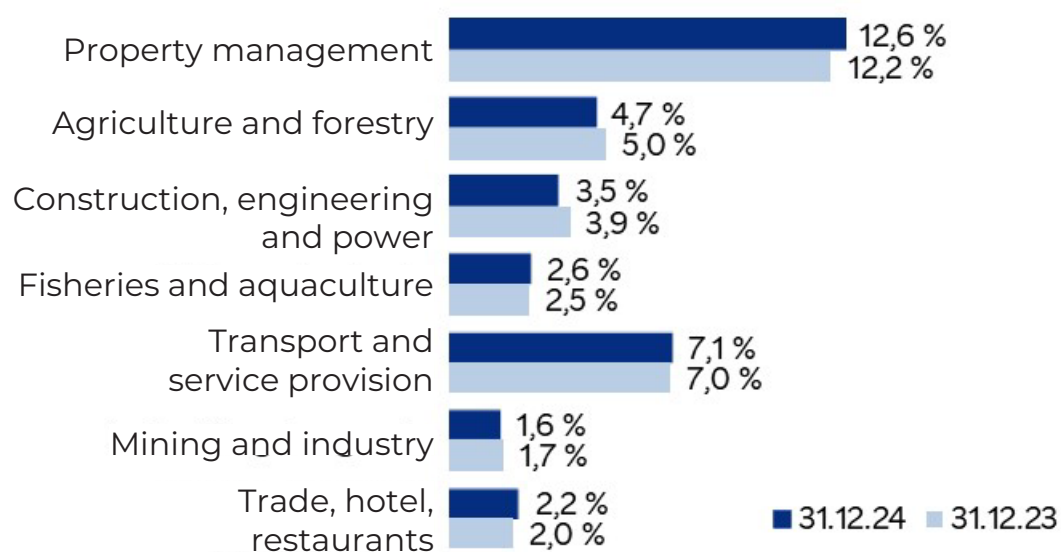
PARENT BANK			GROUP	
31.12.23			31.12.23	
Retail market	Corporate market		Retail market	Corporate market
11	550	Overdraft and working capital facilities	11	565
1 717	41	Flexible loans	2 317	41
93	331	Building loans	93	331
12 841	9 589	Repayment loans and flexible loans	16 601	9 464
<b>14 662</b>	<b>10 511</b>	<b>Gross lending to customers</b>	<b>19 022</b>	<b>10 401</b>

## NOTE 21.3 LOANS, GUARANTEES AND LOSSES BY INDUSTRY

The level of losses in the retail banking market remains low and at a level corresponding to the average for the sector. Procedures for debt recovery and follow-up are effective. Based on empirical data, sector-related figures and local market conditions, the Bank has forecast an expected loss in the retail market portfolio of 0.07 - 0.1%.

There is a strong focus on the quality of the work relating to credit and on improving understanding good governance and control in this work. To manage and monitor risks in the corporate market portfolio, ongoing assessments are carried out concerning customer relationships, solvency, collateral in connection with borrowing and trends in defaults, along with reviews by the Bank's credit committee. To monitor risk development in the retail market portfolio, quarterly analyses are carried out of the quality of credit of new loans and the overall portfolio. The close monitoring of key corporate market customers, monitoring of developments in quality and risk in the portfolio have remained priority focus areas for the Bank. Impairments on loans were booked in 2024 in the amount of NOK 102 million, or 0.26% of gross lending including transferred loans. Normalised lending losses are expected going forward. Based on historical evidence, a thorough knowledge of the Group's commitment and local market conditions, credit losses expected over a five-year period are forecast to amount to 0.15-0.20% of gross lending within the corporate loan portfolio. When pricing commitments, a strong emphasis is placed on the ability of customers to service their debt. There will therefore normally be a correlation between the risk classification and the pricing of loans.

### Distribution of gross lending in CM



### GROSS LENDING AS AT 31.12.24

Of the gross lending of NOK 31.6 billion (NOK 29.4 billion, NOK 10.9 billion (NOK 10.4 billion) comprises lending to corporate customers. The above graph shows these loans by industry. NOK 20.7 billion (NOK 19.0 billion) is lending to retail customers, mainly involving well-collateralised mortgages. NOK 1.5 billion (NOK 1.5 billion) is lending to agricultural customers (traditionally a low-risk segment). Of gross lending, 80.1% (82.8%) was loaned to customers in Helgeland. Of gross lending, 31.5% was transferred to SpareBank 1 Boligkreditt and Helgeland Boligkreditt AS. See Note 21.5

## NOTE 21.4 COMMITMENTS AND LOSS PROVISIONS BY INDUSTRY

GROUP

31.12.24

Lending at amortised cost and fair value							
	Gross lending		Loss provisions		Net lending		Total
	Amorti- sed cost	Fair value (FVOCI)	Stage 1	Stage 2	Stage 3	Fair value via the income state- ment	
Municipalities and municipal enterprises	36	-	0	-	-	-	36
Insurance and finance	11	-	0	0	-	-	11
Agriculture and forestry	1 473	-	-1	-2	-16	5	1 459
Fisheries and aquaculture	827	-	-2	-3	-3	-	818
Mining and industry	504	-	-1	-1	-12	-	489
Construction, engineering and power	1 103	-	-7	-15	-23	-	1 058
Trade, hotel, restaurants	694	-	-1	-10	-1	-	683
Transport and services	2 224	-	-7	-9	-24	19	2 203
Property operation	3 924	-	-8	-37	-68	67	3 879
Corporate market	10 797	0	-28	-76	-146	92	10 638
Retail market	1 017	18 772	-4	-10	-14	941	20 702
<b>Total</b>	<b>11 814</b>	<b>18 772</b>	<b>-31</b>	<b>-86</b>	<b>-160</b>	<b>1 033</b>	<b>31 341</b>
Expected losses, unused credit and guarantees, RM			0	0	0		
Expected losses, unused credit and guarantees, CM			-2	-4	-1		

Off balance sheet items, see note 2.1.1

31.12.23

Lending at amortised cost and fair value							
	Gross lending		Loss provisions			Net lending	
	Amortised cost	Fair value (FVOCI)	Stage 1	Stage 2	Stage 3	Fair value via the income statement	Total
Municipalities and municipal enterprises	3	0	0	0	0	0	3
Insurance and finance	272	0	0	-1	0	0	272
Agriculture and forestry	1 467	0	0	-2	-24	8	1 448
Fisheries and aquaculture	745	0	-1	-3	-2	0	738
Mining and industry	509	0	-1	0	-27	0	480
Construction, engineering and power	1 131	0	-4	-1	-5	4	1 126
Trade, hotel, restaurants	597	0	-2	-3	-2	0	590
Transport and services	2 067	0	-1	-17	-5	6	2 049
Property operation	3 574	0	-20	-21	-53	18	3 497
Corporate market	10 365	0	-31	-48	-119	36	10 203
Retail market	1 122	16 971	-2	-7	-14	929	18 998
<b>Total</b>	<b>11 487</b>	<b>16 971</b>	<b>-33</b>	<b>-55</b>	<b>-133</b>	<b>964</b>	<b>29 202</b>
Expected losses, unused credit and guarantees, RM			0	0	0		
Expected losses, unused credit and guarantees, CM			-2	-3	-1		
Off balance sheet items, see note 2.1.1							

31.12.24

Lending at amortised cost and fair value (via other comprehensive income) FVOCI							
	Gross lending		Loss provisions			Net lending	
	Amortised cost	Fair value (FVOCI)	Stage 1	Stage 2	Stage 3	Fair value via the income statement	Total
Municipalities and municipal enterprises	36	-	0	-	-	-	36
Insurance and finance	11	-	0	0	-	-	11
Agriculture and forestry	1.469	-	-1	-2	-16	5	1 455
Fisheries and aquaculture	823	-	-2	-3	-3	-	815
Mining and industry	503	-	-1	-1	-12	-	488
Construction, engineering and power	1 095	-	-7	-15	-23	-	1 050
Trade, hotel, restaurants	694	-	-1	-10	-1	-	683
Transport and services	2 205	-	-7	-9	-24	19	2 184
Property operation	4 065	-	-8	-39	-66	67	4 021
Corporate market	10 901	0	-28	-78	-144	92	10 743
Retail market	896	14 845	-3	-7	-16	941	16 656
<b>Total</b>	<b>11 797</b>	<b>14 845</b>	<b>-31</b>	<b>-85</b>	<b>-160</b>	<b>1 033</b>	<b>27 400</b>
Expected losses, unused credit and guarantees, RM			0	0	0		
Expected losses, unused credit and guarantees, CM			-4	-4	0		
Off balance sheet items, see note 2.1.1							



**Lending at amortised cost and fair value (via other comprehensive income)  
FVOCI**

	Gross lending		Loss provisions			Net lending		
	Amortised cost	Fair value (FVOCI)	Stage 1	Stage 2	Stage 3	Fair value via the income statement	Total	
Municipalities and municipal enterprises	3	0	0	0	0	0	3	
Insurance and finance	272	0	0	-1	0	0	272	
Agriculture and forestry	1 453	0	0	-2	-24	8	1 434	
Fisheries and aquaculture	742	0	-1	-3	-2	0	735	
Mining and industry	508	0	-1	0	-27	0	479	
Construction, engineering and power	1 126	0	-4	-1	-5	4	-1 120	
Trade, hotel, restaurants	596	0	-2	-3	-2	0	589	
Transport and services	2 038	0	-1	-17	-5	6	2 020	
Property operation	3 738	0	-22	-21	-53	18	3 660	
Corporate market	10 476	0	-33	-48	-119	36	10 312	
Retail market	969	12 764	1	-7	-14	929	14 639	
<b>Total</b>	<b>11 445</b>	<b>12 764</b>	<b>33</b>	<b>-55</b>	<b>-133</b>	<b>964</b>	<b>24 952</b>	
Expected losses, unused credit and guarantees, RM			0	0	0			
Expected losses, unused credit and guarantees, CM			-2	-3	-1			

Off balance sheet items, see note 2.1.1

**NOTE 21.5 TRANSFERRED MORTGAGES TO CREDIT INSTITUTIONS**

The Bank transfers mortgages to Helgeland Boligkreditt AS (100%) and SpareBank 1 Boligkreditt (2.93%). Loans in the wholly owned mortgage credit institution are recognised in their entirety in the Group. In total, NOK 12 648 million in loans secured in residential property had been transferred by the end of 2024, of which NOK 4 093 million is recognised in the consolidated balance sheet.

Loans which are transferred are fully secured mortgages within the mortgage value of 75%. The loans that are sold are derecognised from the Parent Bank's balance sheet and transferred to a mortgage credit company. Some 31.5% (34.0%) of gross lending or 43.3% (47.4%) of loans for retail customers have been transferred to a mortgage credit company.

**PARENT BANK****GROUP**

31.12.24			31.12.24	
Book value	Fair value		Book value	Fair value
1 998	1 998	Flexible loans	1 242	1 242
10 650	10 650	Instalment loans	7 313	7 313
<b>12 648</b>	<b>12 648</b>	<b>Total transferred mortgages to credit institutions</b>	<b>8 555</b>	<b>8 555</b>

## PARENT BANK

## GROUP

31.12.23			31.12.23	
Book value	Fair value		Book value	Fair value
1 732	1 732	Flexible loans	1 117	1 117
11 253	11 253	Instalment loans	7 442	7 442
<b>12 985</b>	<b>12 985</b>	<b>Total transferred mortgages to credit institutions</b>	<b>8 559</b>	<b>8 559</b>

## NOTE 21.6 REMAINING TERM TO MATURITY, HELGELAND BOLIGKREDITT AS

## GROUP

31.12.24					
	From 0-3 months	From 3 months to 1 year	From 1-5 years	Over 5 years	Total
Liabilities to credit institutions	0	0	473	0	473
Borrowings through the issuing of securities	250	558	2 372	581	3 761
Financial derivatives, gross settlement (outflows) <sup>1</sup>	14	40	212	53	319
<b>Total outgoing payments</b>	<b>264</b>	<b>598</b>	<b>3 057</b>	<b>634</b>	<b>4 553</b>
Loans to and receivables from credit institutions	-	429	-	-	429
Loans to and receivables from customers	801	3	98	4 204	5 107
Certificates and bonds	50	100	-	-	150
<b>Total incoming payments</b>	<b>850</b>	<b>532</b>	<b>98</b>	<b>4 204</b>	<b>5 685</b>
1) Financial derivatives, gross settlement (inflows)	-	33	130	43	205

31.12.23					
	From 0-3 months	From 3 months to 1 year	From 1-5 years	Over 5 years	Total
Liabilities to credit institutions	0	0	1 023	0	1 023
Borrowings through the issuing of securities	104	911	2 107	539	3 661
Financial derivatives, gross settlement (outflows)	7	20	79	20	126
<b>Total outgoing payments</b>	<b>111</b>	<b>931</b>	<b>3 209</b>	<b>559</b>	<b>4 810</b>
Loans to and receivables from credit institutions	0	408	0	0	408
Loans to and receivables from customers	652	20	113	4 789	5 574
Certificates and bonds	50	107	100	0	257
<b>Total incoming payments</b>	<b>702</b>	<b>535</b>	<b>213</b>	<b>4 789</b>	<b>6 239</b>
Financial derivatives, gross settlement (inflows)	0	11	33	11	55

## NOTE 22. FINANCIAL INSTRUMENTS

### NOTE 22.1 FINANCIAL INSTRUMENTS BY CATEGORY

GROUP

31.12.24

	Amortised cost	Loans at fair value Via OCI	Assets at fair value via the income statement	Derivatives used for hedging purposes	Total
Cash and receivables, central banks	124	0	0	0	124
Loans to and receivables from credit institutions	1 340	0	0	0	1 340
Loans to and receivables from customers	11 539	18 772	1 032	0	31 343
Certificates, bonds and shares	0	0	5 541	0	5 541
Financial derivatives	0	0	0	30	30
<b>Total assets</b>	<b>13 003</b>	<b>18 772</b>	<b>6 573</b>	<b>30</b>	<b>38 378</b>

	Other financial liabilities at amortised cost	Liabilities at fair value via the income statement	Derivatives used for hedging	Total
Liabilities to credit institutions	2	0	0	2
Deposits from and liabilities to customers	24 505	563	0	25 068
Liabilities established through the issuing of securities	5 917	0	0	5 917
Liabilities established through the issuing of securities, hedging	1 960	0	0	1 960
Subordinated loan capital	452	0	0	452
Financial derivatives	0	92	0	92
<b>Total liabilities</b>	<b>32 836</b>	<b>655</b>	<b>0</b>	<b>33 491</b>

GROUP

31.12.23

	Amortised cost	Loans at fair value Via OCI	Assets at fair value via the income statement	Derivatives used for hedging purposes	Total
Cash and receivables, central banks	83	0	0	0	83
Loans to and receivables from credit institutions	842	0	0	0	842
Loans to and receivables from customers	11 509	16 730	964	0	29 203
Certificates, bonds and shares	0	0	6 113	0	6 113
Financial derivatives	0	0	0	64	64
<b>Total assets</b>	<b>12 434</b>	<b>16 730</b>	<b>7 077</b>	<b>64</b>	<b>36 305</b>

	Other financial liabilities at amortised cost	Liabilities at fair value via the income statement	Derivatives used for hedging	Total
Liabilities to credit institutions	320	0	0	320
Deposits from and liabilities to customers	24 683	0	0	24 683
Liabilities established through the issuing of securities	4 497	0	0	4 497
Liabilities established through the issuing of securities, hedging	1 602	0	0	1 602
Subordinated loan capital	352	0	0	352
Financial derivatives	0	81	0	81
<b>Total liabilities</b>	<b>31 454</b>	<b>81</b>	<b>0</b>	<b>31 535</b>

# PARENT BANK

31.12.24

	Amortised cost	Loans at fair value Via OCI	Assets at fair value via the income statement	Derivatives used for hedging purposes	Total
Cash and receivables, central banks	124				124
Loans to and receivables from credit institutions	1 813				1 813
Loans to and receivables from customers	11 526	14 845	1 032		27 403
Certificates, bonds and shares				5 391	5 391
Financial derivatives				30	30
<b>Total assets</b>	<b>13 463</b>	<b>14 845</b>	<b>1 032</b>	<b>5 421</b>	<b>34 761</b>

	Other financial liabilities at amortised cost	Liabilities at fair value via the income statement	Derivatives used for hedging purposes	Total
Liabilities to credit institutions	414	0	0	414
Deposits from and liabilities to customers	24 517	563	0	25 080
Liabilities established through the issuing of securities	3 324	0	0	3 324
Liabilities established through the issuing of securities, hedging	996	0	0	996
Subordinated loan capital	452	0	0	452
Financial derivatives	0	23	0	23
<b>Total liabilities</b>	<b>29 703</b>	<b>586</b>	<b>0</b>	<b>30 289</b>

Changes in the fair value of loans classified as FVOCI which are recognised via OCI are insignificant (less than NOK 1 million).

## PARENT BANK

31.12.23

	Amortised cost	Loans at fair value Via OCI	Assets at fair value via the income statement	Derivatives used for hedging purposes	Total
Cash and receivables, central banks	83	0	0	0	83
Loans to and receivables from credit institutions	1 865	0	0	0	1 865
Loans to and receivables from customers	11 253	12 737	964	0	24 954
Certificates, bonds and shares	0	0	0	5 866	5 866
Financial derivatives	0	0	0	64	64
<b>Total assets</b>	<b>13 201</b>	<b>12 737</b>	<b>964</b>	<b>5 930</b>	<b>32 832</b>

	Other financial liabilities at amortised cost	Liabilities at fair value via the income statement	Derivatives used for hedging	Total
Liabilities to credit institutions with agreed maturity	316	0	0	316
Deposits from and liabilities to customers	25 156	0	0	25 156
Liabilities established through the issuing of securities	1 517	0	0	1 517
Liabilities established through the issuing of securities, hedging	1 144	0	0	1 144
Subordinated loan capital	352	0	0	352
Financial derivatives	0	33	0	33
<b>Total liabilities</b>	<b>28 485</b>	<b>33</b>	<b>0</b>	<b>28 518</b>

## NOTE 22.2 DEBT SECURITIES, VALUE HEDGING

Fixed-rate debt securities are normally secured by value hedging. When a hedge is established, the Bank documents the relationship between the hedging instruments and the hedged items. The Group also documents its assessment of whether the derivatives being used are sufficiently effective in counteracting changes in fair value linked to the hedged items. Such assessments are documented both upon establishment of the hedge and on an ongoing basis during the hedging period. The Bank hedges interest rate risk at individual level. Risks relating to changes in credit spread are not hedged. Changes in value linked to changes in the NIBOR rate are recognised and the book value of the hedged fixed-rate loans is adjusted on an ongoing basis. The book value of debt securities with a fixed interest rate, including accrued interest, amounts to NOK 996 million (NOK 1 169 million). The net recognised gain linked to the hedging instruments and hedged items linked to the hedged risk amounted to NOK 0 million in 2024 and NOK -1 million in 2023. See also Note 36.1

## GROUP

Ineffective hedging via the income statement	31.12.24	31.12.23
Effectiveness linked to hedged items	24	70
Effectiveness linked to the hedging instrument	24	-69
<b>Net ineffectiveness via the income statement</b>	<b>0</b>	<b>-1</b>



**PARENT BANK**
**GROUP**

31.12.24				31.12.24		
Contract sum	Fair value		At fair value via the income statement	Contract Total	Fair value	
	Assets	Liabilities			Assets	Liabilities
1 000	30	0	Interest rate swaps – fixed interest rate borrowing hedging	2 000	30	0
<b>1 000</b>	<b>30</b>	<b>0</b>	<b>Total financial derivatives, hedging</b>	<b>2 000</b>	<b>30</b>	<b>0</b>

31.12.23				31.12.23		
Contract sum	Fair value		At fair value via the income statement	Contract Total	Fair value	
	Assets	Liabilities			Assets	Liabilities
1 500	64	0	Interest rate swaps – fixed interest rate borrowing hedging	2 000	64	0
<b>1 500</b>	<b>64</b>	<b>0</b>	<b>Total financial derivatives, hedging</b>	<b>2 000</b>	<b>64</b>	

**GROUP**

Ref.	Hedged item	Contract sum	Settlement date	Interest rate	Accounting line	Currency
1	Fixed rate, borrowing	500	2026	1.88	Liabilities established through the issuing of securities	NOK
2	Fixed rate, borrowing	500	2028	5.20	Liabilities established through the issuing of securities	NOK
3	Fixed rate, borrowing	500	2029	2.22	Liabilities established through the issuing of securities	NOK
4	Fixed rate, borrowing	500	2032	4.28	Liabilities established through the issuing of securities	NOK
Ref.	Hedging instrument	Contract sum	Settlement date	Interest rate	Accounting line	Currency
1	Interest rate swap, fixed	500	2025	1.88	Financial derivatives	NOK
1	Interest rate swap, variable	-500	2025	5.25	Financial derivatives	NOK
2	Interest rate swap, fixed	500	2028	5.20	Financial derivatives	NOK
2	Interest rate swap, variable	-500	2028	5.71	Financial derivatives	NOK
3	Interest rate swap, fixed	500	2029	2.22	Financial derivatives	NOK
3	Interest rate swap, variable	-500	2029	5.32	Financial derivatives	NOK
4	Interest rate swap, fixed	500	2032	4.28	Financial derivatives	NOK
4	Interest rate swap, variable	-500	2032	5.31	Financial derivatives	NOK

References 3 and 4 concern debt established through the issuing of securities in the subsidiary Helgeland Boligkreditt.

No instalments are paid on the hedging instruments or assets. These fall due in full as at the settlement date.

## NOTE 22.3 ASSESSMENT OF FAIR VALUE OF FINANCIAL INSTRUMENTS BY LEVEL

The table shows financial instruments at fair value according to the valuation method (IFRS13). The changes require the presentation of fair value measurements per level, with the following subdivisions into levels. The various levels are defined as follows:

- Level 1 - Listed price in an active market for an identical asset or liability
- Level 2 - Valuation based on observable factors, either directly (price) or indirectly (derived from prices), other than the listed price (used in level 1) for the asset or liability
- Level 3 - Valuation based on factors not obtained from observable markets (non-observable assumptions)

The fair value of financial instruments that are traded on an active market is based on the market price at the end of the reporting period. A market is considered to be active if the markets rates are readily and regularly available from a stock exchange, trader, broker, business group, pricing service or regulatory authority, and the prices represent actual and regularly occurring arm's length market transactions. The market price used for financial assets is the current bid price, while for financial liabilities the current offer price is used. These instruments are included in level 1.

The fair value of financial instruments that are not traded on an active market is determined by using valuation methods. These valuation methods maximise the use of observable data where such data is available, and are based as little as possible on the Group's own estimates. If all the significant data required to determine the fair value of an instrument comprise observable data, the instrument are included in level 2.

Unlisted shares and fixed-rate loans are classified under level 3. In the case of the valuation of shares where there is no active market, known sales values are based on the latest issue price. For securities without sales, the value is determined on the basis of available accounting information or similar. Fixed-rate lending is recognised at fair value (see also the description of valuation in Note 1).

Interest rate derivatives that are not part of the hedge accounting amount to NOK 1 120 million as at 31.12.24, and NOK 1 504 million as at 31.12.23. Net interest rate risk in the event of a parallel change in interest rate of 1 percentage point for fixed-rate lending amounts to NOK -32 million (NOK -17 million) as at 31.12.24, while interest rate derivatives amount to NOK -3 million (NOK 25 million) as at 31.12.24.

No transfers took place between levels 1 and 2 during 2024.

### Assets and liabilities at fair value

PARENT BANK				GROUP		
31.12.24				31.12.24		
Level 1	Level 2	Level 3		Level 1	Level 2	Level 3
<b>Assets</b>						
<b>Financial assets at fair value via the income statement</b>						
0	0	1 032	Loans to and receivables from customers at fair value	0	0	1 032
0	4 438	953	Certificates, bonds and shares at fair value	0	4 588	953
<b>Financial assets at fair value via other comprehensive income</b>						
0	0	14 845	Mortgages	0	0	18 772
0	30	0	Financial derivatives, hedging	0	30	0
<b>0</b>	<b>4 468</b>	<b>16 830</b>	<b>Total assets</b>	<b>0</b>	<b>4 618</b>	<b>20 757</b>
<b>Liabilities</b>						
<b>Financial liabilities at fair value via the income statement</b>						
0	23	0	Financial derivatives	0	92	0
<b>0</b>	<b>23</b>	<b>0</b>	<b>Total liabilities</b>	<b>0</b>	<b>92</b>	<b>0</b>

Shares	Lending	Total	Change in the instruments classified under level 3	Shares	Lending	Total
864	13 728	14 592	Balance brought forward	864	17 935	18 799
-34	-1 259	-1 293	Instalments and loans redeemed	-34	-1 435	-1 469
151	3 402	3 553	New loans	151	3 298	3 449
-28	6	-22	Change in value	-28	6	-22
953	15 877	16 830	Financial instruments valued according to level 3	953	19 804	20 757

## Assets and liabilities at fair value

PARENT BANK				GROUP		
31.12.23				31.12.23		
Level 1	Level 2	Level 3		Level 1	Level 2	Level 3
<b>Assets</b>						
<b>Financial assets at fair value via the income statement</b>						
0	0	964	Loans to and receivables from customers at fair value	0	0	964
0	5 002	872	Certificates, bonds and shares at fair value	0	5 249	864
<b>Financial assets at fair value via other comprehensive income</b>						
0	0	12 764	Mortgages	0	0	16 971
0	64	0	Financial derivatives, hedging	0	64	0
<b>0</b>	<b>5 066</b>	<b>14 592</b>	<b>Total assets</b>	<b>0</b>	<b>5 313</b>	<b>18 799</b>
<b>Liabilities</b>						
<b>Financial liabilities at fair value via the income statement</b>						
0	33	0	Financial derivatives	0	81	0
<b>0</b>	<b>33</b>	<b>0</b>	<b>Total liabilities</b>	<b>0</b>	<b>81</b>	<b>0</b>

Shares	Lending	Total	Change in the instruments classified under level 3	Shares	Lending	Total
712	15 214	15 926	Balance brought forward	712	20 052	20 764
0	-2 829	2829	Instalments and loans redeemed	0	-3 489	-3 489
157	1 208	1 365	New loans	157	1 308	1 465
-5	135	130	Change in value	-5	64	59
864	13 728	14 592	Financial instruments valued according to level 3	864	17 934	18 799

## NOTE 22.4 FAIR VALUE OF FINANCIAL INSTRUMENTS

PARENT BANK					GROUP			
31.12.23		31.12.24			31.12.24		31.12.23	
Fair value	Balance sheet value	Fair value	Balance sheet value	Fair value of financial instruments	Fair value	Balance sheet value	Fair value	Balance sheet value
Assets								
83	83	124	124	Cash and receivables, central banks	124	124	83	83
1 865	1 865	1 813	1 813	Loans to and receivables from credit institutions	1 340	1 340	842	842
13 728	13 728	15 877	15 877	Loans to customers at fair value 3)	19 804	19 804	17 935	17 925
11 226	11 226	11 526	11 526	Loans to customers at amortised cost 1)	11 539	11 539	11 268	11 279
64	64	30	30	Financial derivatives	30	30	64	64
5 866	5 866	5 391	5 391	Certificates, bonds and shares	5 541	5 541	6 113	6 113
32 832	32 832	34 761	34 761	Total	38 378	38 378	36 305	36 306
Liabilities								
316	316	414	414	Liabilities to credit institutions at amortised cost	2	2	320	320
430	430	563	563	Deposits from and liabilities to customers at fair value	563	563	430	430
24 723	24 726	24 517	24 517	Deposits from and liabilities to customers at amortised cost	24 505	24 505	25 253	24 253
1 144	1 144	996	996	Debt securities, hedging 2)	1 960	1 960	1 602	1 602
1 498	1 517	3 308	3 324	Covered bonds, amortised cost (FRN) 2)	5 917	5 896	4 497	4 486
336	336	452	452	Subordinated loan	452	452	352	352
31	31	23	23	Financial derivatives	92	92	81	81
28 478	28 500	30 273	30 289	Total	33 491	33 470	32 535	31 524

1) The carrying amount for loans to customers at amortised cost approximates to fair value.

2) The fair value of debt securities and subordinated loans is calculated from a theoretical market value based on interest rate and spread curves.

3) Lending at fair value via the income statement and lending at fair value via other comprehensive income (OCI).

## NOTE 23. FINANCIAL DERIVATIVES

### GENERAL DESCRIPTION - CURRENCY AND INTEREST RATE AGREEMENTS

Interest rate swaps: agreement to swap interest rate conditions for an agreed amount over an agreed period.

Interest swap agreements and currency swap agreements: agreements to swap currency and interest rate conditions over a pre-agreed period for an agreed amount. SpareBank 1 Helgeland enters into hedging transactions with reputable Norwegian and foreign banks in order to reduce the Bank's own risk. Derivative transactions are linked to ordinary banking operations and are executed to reduce the risk associated with the Group's debt securities in the financial markets and to mitigate risk relating to customer-focussed activity. Only debt securities linked to the Group's fixed-rate borrowing are defined as "fair value hedging". The Group does not use cash flow hedging. The Board of Directors has established limits for maximum risk on the Group's interest rate positions. Procedures have been established to ensure that the adopted framework is followed.

The agreements entered into by the Bank are interest rate-related financial derivatives. These are interest rate swaps linked to fixed-rate debt securities and fixed-rate lending. The reason for using interest rate swap agreements is that a positive or negative change in the value of the underlying item will largely be offset by an opposing change in the value of the interest rate swap. The amounts are inclusive of accrued interest.

**Financial derivatives**

<b>PARENT BANK</b>				<b>GROUP</b>		
<b>31.12.24</b>				<b>31.12.24</b>		
<b>Con- tract sum</b>	<b>Fair value</b>		<b>At fair value via the income statement</b>	<b>Con- tract sum</b>	<b>Fair value</b>	
	<b>assets</b>	<b>liabilities</b>			<b>assets</b>	<b>liabilities</b>
-1 120	0	23	Interest rate swaps – fixed interest rate loans	-1 120	0	92
30	0	0	Interest rate swaps, interest-bearing securities	30	0	0
<b>1 150</b>	<b>0</b>	<b>23</b>	<b>Total financial derivatives at fair value via the income statement</b>	<b>1 150</b>	<b>0</b>	<b>92</b>
1 000	30	0	Interest rate swaps – fixed-rate debt securities hedging	2 000	30	0
<b>1 000</b>	<b>30</b>	<b>0</b>	<b>Total financial derivatives, hedging</b>	<b>2 000</b>	<b>30</b>	<b>0</b>

**Financial derivatives**

<b>PARENT BANK</b>				<b>GROUP</b>		
<b>31.12.23</b>				<b>31.12.23</b>		
<b>Con- tract sum</b>	<b>Fair value</b>		<b>At fair value via the income statement</b>	<b>Con- tract sum</b>	<b>Fair value</b>	
	<b>assets</b>	<b>liabilities</b>			<b>assets</b>	<b>liabilities</b>
1 504	0	33	Interest rate swaps – fixed interest rate loans	1 504	0	81
30	0	0	Interest rate swaps, interest-bearing securities	30	0	0
<b>1 534</b>	<b>0</b>	<b>33</b>	<b>Total financial derivatives at fair value via the income statement</b>	<b>1 534</b>	<b>0</b>	<b>81</b>
1 500	64	0	Interest rate swaps – fixed-rate debt securities hedging	2 000	64	0
<b>1 500</b>	<b>64</b>	<b>0</b>	<b>Total financial derivatives, hedging</b>	<b>2 000</b>	<b>64</b>	<b>0</b>

## NOTE 23.1 NET PRESENTATION OF FINANCIAL ASSETS AND LIABILITIES

Instruments of relevance to the management of interest rate risk will primarily be interest rate swaps (interest rate swap agreements).

Transactions involving derivatives can be carried out with different counterparties. In order to differentiate the counterparty structure, selected major banks/brokerage houses which account for the majority of the turnover in interest-related products in the market are used. The Bank has the opportunity to offset balances. Amounts are not offset in the balance sheet because the transactions are not usually settled on a net basis.

					<b>GROUP</b>
					<b>31.12.24</b>
	<b>Gross financial assets</b>	<b>Financial assets recognised net</b>	<b>Net financial assets in the balance sheet</b>	<b>Financial Instruments</b>	<b>Net present</b>
Derivatives as assets	30	0	30	-30	0
Derivatives as liabilities	92	0	92	-30	62

## GROUP

31.12.23

	Gross financial assets	Financial assets recognised net	Net financial assets in the balance sheet	Financial instruments	Net present
Derivatives as assets	64	0	64	-64	0
Derivatives as liabilities	81	0	81	-64	17

## NOTE 24. CERTIFICATES, BONDS AND SHARES

## PARENT BANK

## GROUP

31.12.23	31.12.24		31.12.24	31.12.23
4 970	4 410	Certificates and bonds	4 560	5 217
32	28	Accrued interest on securities	28	32
864	953	Shares, unit trust certificates and equity certificates	953	864
5 866	5 391	Total certificates, bonds 1-2)	5 541	6 113

1) The figures represent the maximum credit exposure.

2) The Group's policy of prudence in the securities market will be continued, and changes in the value of financial investments are expected to reflect this. The fixed income portfolio amounts to 14.6% (14.4%) of bank assets.

## NOTE 24.1 CERTIFICATES AND BONDS

The Bank's portfolio of certificates and bonds is valued at fair value. All changes in value are recognised via the income statement.

Insofar as there is an active market for the securities concerned, observable market prices are used to determine fair value.

## PARENT BANK

## GROUP

31.12.24			31.12.24	
Nominal value value	Fair value		Nominal value value	Fair value
1 507	1 512	Bonds issued by the public sector	1 507	1 512
100	98	Certificates	150	147
2 780	2 800	Other bearer bonds	2 880	2 900
	28	Accrued interest on securities		28
4 387	4 438	Total certificates and bonds	4 537	4 587



**PARENT  
BANK****GROUP**

<b>31.12.23</b>			<b>31.12.23</b>	
<b>Nominal value value</b>	<b>Fair value</b>		<b>Nominal value value</b>	<b>Fair value</b>
1 373	1 379	Bonds issued by the public sector	1 373	1 379
50	49	Certificates	200	195
3 511	3 697	Other bearer bonds	3 621	3 808
	32	Accrued interest on securities		32
4 934	5 157	Total certificates and bonds	5 194	5 414

SpareBank 1 Helgeland had no bonds issued by Helgeland Boligkreditt AS at the end of the year or at the same time last year. It is used as collateral for concluded swap agreements with Norges Bank.

The Bank has adopted a cautious strategy with regard to securities, with specified parameters including minimum requirements regarding ratings for both Norwegian and foreign securities. The framework and authorisations are revised annually and are approved by the Bank's Board. The Group's portfolio of certificates and bonds is classified as current assets in their entirety. The purpose of the certificate and bond portfolio is to ensure that the Group has liquidity reserves at its disposal. The Bank's liquidity holdings are not deemed to constitute a trading portfolio.

## **NOTE 25. SHARES, UNIT TRUST CERTIFICATES AND EQUITY CERTIFICATES AT FAIR VALUE**

**PARENT BANK AND GROUP**

	<b>31.12.24</b>		<b>31.12.23</b>	
	<b>Acquisition cost</b>	<b>Book value</b>	<b>Acquisition cost</b>	<b>Book value</b>
Total shares, unit trust certificates and equity certificates	928	953	847	864

Unrealised changes in value in the portfolio are recognised via the income statement under net income from financial instruments.

<b>Company</b>	<b>Org. no.</b>	<b>The Compa- ny's share capital</b>	<b>Number of shares</b>	<b>Cost price</b>	<b>Equity sta- ke and Vote-entit- ling capital</b>	<b>Carrying amount</b>
SpareBank 1 Boligkreditt AS	988.738.387	13 888	2 704 381	407	2.93%	406
SpareBank 1 Finans Nord-Norge AS	930.060.237	1 923	36 330	288	15.00%	288
SpareBank 1 Betaling AS	916.116.749	29	886 964	50	3.22%	63
SpareBank 1 Regnskapshu-set NN AS	851.987.142	10	225	51	15.00%	51
EiendomsMegler 1 Nord-Norge AS	931.262.041	21	3 150	24	15.00%	26
Kredittbanken ASA	975.966.453	508	233 298	86	3.18%	86
Total Other				22		33
<b>Total Shares</b>				<b>928</b>		<b>953</b>

## NOTE 25.1 ADDITIONS/DISPOSALS OF SHARES, UNIT TRUST CERTIFICATES AND EQUITY CERTIFICATES

### PARENT BANK AND GROUP

	31.12.24	31.12.23
Portfolio as at 01.01	864	712
Additions	151	158
Disposals	34	0
Adjustment to fair value	-28	-6
<b>Portfolio as at 31.12</b>	<b>953</b>	<b>864</b>

## NOTE 26. INVESTMENTS IN SUBSIDIARIES

### PARENT BANK

	Share capital	Number of shares	Equity stake	Registered office	Book value 31.12.24	Book value 31.12.23
Bankbygg Mo AS	0.1	198 962	99.8%	Mo i Rana	97	97
Helgeland Boligkreditt AS	540	540	100%	Mo i Rana	540	540
AS Sparebankbygg	0.1	100	100%	Sandnessjøen	1	1
Helgeland Spb.eiend.selskap AS	0.1	100	100%	Mosjøen	0.4	0.4
Storgata 73 AS	0.1	140	100%	Brønnøysund	9	9
<b>Total capitalised value</b>					<b>648</b>	<b>648</b>

## NOTE 26.1 SPECIFICATION OF YEAR'S CHANGES IN SUBSIDIARIES

### PARENT BANK

	31.12.24	31.12.23
Carrying amount as at 01.01	648	591
Additions/disposals	0	58
Write-downs	0	0
<b>Carrying amount as at 31.12</b>	<b>648</b>	<b>648</b>

## NOTE 26.2 SHARES IN SUBSIDIARIES

### PARENT BANK

	Equity stake	Current assets	Fixed assets	Current liabilities	Non-current liabilities	Equity	Book value 31.12.24
Bankbygg Mo AS	99.8%	2	206	1	130	77	97
Helgeland Boligkreditt AS	100%	4 601	0	473	3 557	571	540
AS Sparebankbygg	100%	2	11	0	11	2	1
Helgeland Spb.eiend. selskap AS	100%	4	17	1	8	12	0.4
Storgata 73 AS	100%	2	8	0	2	7	1

	Equity stake	Income	Costs	Profit
Bankbygg Mo AS	99.8%	18	21	-3
Helgeland Boligkreditt AS	100%	274	251	23
AS Sparebankbygg	100%	3	2	0
Helgeland Spb.eiend.selskap AS	100%	5	4	1
Storgata 73 AS	100%	3	1	1

## PARENT BANK

31.12.23

	Equity stake	Current assets	Fixed assets	Current liabilities	Non-current liabilities	Equity	Book value
Bankbygg Mo AS	99.8%	51	180	4	148	80	97
Helgeland Boligkreditt AS	100%	5 085	0	1 022	3 493	570	540
AS Sparebankbygg	100%	6	12	0	16	2	1
Helgeland Spb.eiend.selskap AS	100%	2	19	1	9	11	0.4
Storgata 73 AS	100%	3	8	0	4	6	9

	Equity stake	Income	Costs	Profit
Bankbygg Mo AS	99.8%	13	18	-6
Helgeland Boligkreditt AS	100%	244	223	22
AS Sparebankbygg	100%	3	3	0
Helgeland Spb.eiend.selskap AS	100%	5	4	1
Storgata 73 AS	100%	3	3	1

## NOTE 27. ASSOCIATES AND JOINT ARRANGEMENTS

Samarbeidende SpareBanker AS, SpareBank 1 SamSpar AS and Samarbeidene SpareBanker Utvikling DA

SpareBank 1 Helgeland's stake in SamSpar is strategic in nature. The investment is part of SpareBank 1 Helgeland's entry into the SpareBank 1 Alliance. At year end, SpareBank 1 Helgeland held stakes of 4.1% in Samarbeidene SpareBanker AS, 4.5% in SpareBank 1 SamSpar AS and 5.3% in Samarbeidende SpareBanker Utvikling DA.

The enterprises are defined as jointly controlled enterprises, and are thus recognised at cost price, with subsequent valuations in accordance with the equity method. Forecasts are used where no final accounting figures are available.

## PARENT BANK AND GROUP

					31.12.24	31.12.23
Balance 100% stake	Share capital	Cost price	Number of shares	Equity stake, %	Book value	Book value
Samarbeidende Sparebanker AS	373	191	38 095	4.1%	183	134
SpareBank 1 SamSpar AS	16	9	40 020	4.5%	9	6
Samarbeidende Sparebanker utvikling DA		7	6 791 920	5.3%	5	1
<b>Total investment in associates and jointly controlled enterprises</b>					<b>198</b>	<b>142</b>

## PARENT BANK AND GROUP

31.12.24

Balance 100% stake		Assets	Liabilities	Income	Costs	Profit
Samarbeidende Sparebanker AS		2 443	0	690	2	688
SpareBank 1 SamSpar AS		75	47	145	145	0
Samarbeidende Sparebanker utvikling DA		151	1	368	367	1
<b>Total</b>		<b>2 669</b>	<b>48</b>	<b>1 203</b>	<b>514</b>	<b>689</b>
Samarbeidende Sparebanker AS	4.1%	100	0	28	0	28
SpareBank 1 SamSpar AS	4.5%	3	2	7	7	0
Samarbeidende Sparebanker utvikling DA	5.3%	8	0	20	19	0
<b>Total</b>		<b>111</b>	<b>2</b>	<b>54</b>	<b>26</b>	<b>28</b>

## PARENT BANK AND GROUP

31.12.23

Balance 100% stake		Assets	Liabilities	Income	Costs	Profit
Samarbeidende Sparebanker AS		1 781	0	-23	6	-29
SpareBank 1 SamSpar AS		82	54	129	127	2
Samarbeidende Sparebanker utvikling DA		150	1	349	343	6
<b>Total</b>		<b>2 013</b>	<b>55</b>	<b>455</b>	<b>476</b>	<b>-21</b>
Samarbeidende Sparebanker AS	3.4%	60	0	-1	0	-1
SpareBank 1 SamSpar AS	3.2%	3	2	4	4	0
Samarbeidende Sparebanker utvikling DA	3.2%	5	0	11	11	0
<b>Total</b>		<b>67</b>	<b>2</b>	<b>14</b>	<b>15</b>	<b>-1</b>

## NOTE 27.1 SPECIFICATION OF CHANGES IN ASSOCIATES AND JOINT ARRANGEMENTS

## PARENT BANK AND GROUP

Change in carrying amount, associates and jointly controlled enterprises	31.12.24	31.12.23
Carrying amount as at 01.01	142	145
Additions	34	20
Disposals	0	0
Change in equity	0	-6
Share of earnings	22	-1
Other changes	0	0
Dividends	0	-17
<b>Carrying amount as at 31.12</b>	<b>198</b>	<b>142</b>

## NOTE 27.2 STRATEGIC INVESTMENTS, NOT TREATED AS ASSOCIATES

The Bank has strategic investments in SpareBank 1 Betaling (3.22%), the leasing company SpareBank 1 Finans Nord-Norge (15%), EiendomsMegler 1 Nord-Norge (15%), SpareBank 1 Regnskapshuset Nord-Norge (15%), SpareBank 1 Boligkreditt (2.93%) and Kredittbanken ASA (3.18%). These companies have not been consolidated in the Bank's financial statements or treated as an associate, and are recognised at cost with subsequent valuation at fair value. In addition, the Group has an indirect stake in SpareBank 1 Gruppen of 0.80% through its holding in Samarbeidene SpareBanker AS.

## NOTE 28. RELATED PARTIES

SpareBank 1 Helgeland defines its subsidiaries and associated companies as related parties. Transactions between the Parent bank, Group companies and associated companies are executed in accordance with ordinary commercial terms and principles. The information is disclosed in accordance with IAS 24 for "Disclosure of related parties". Loans to elected representatives and employees are described in Note 28.2. For a more detailed description of remunerations, etc., see the remuneration report, which is published on the Company's website.

## NOTE 28.1 INTRA-GROUP ELIMINATIONS/TRANSACTIONS

	GROUP AND PARENT BANK	
	31.12.24	31.12.23
<b>Income statement</b>		
Interest from interest and credit commission income from subsidiaries	70	49
Dividends received/group contributions	22	29
Interest on subsidiaries' deposits	10	9
Rent expenses	24	18
Management fees	5	6
<b>Balance sheet</b>		
Loans to subsidiaries	624	1 200
Covered bonds	0	0
Deposits from subsidiaries	424	469
Receivables concerning dividends	24	22

### HELGELAND BOLIGKREDITT AS (STAKE 100%)

Transferred loans as at 31.12.24 amounted to a total of NOK 4 093 million (NOK 4 427 million). Covered bonds in the mortgage credit institution amounted to NOK 3 549 million (NOK 3 438 million), of which NOK 0 million (NOK 0 million) have been acquired by SpareBank 1 Helgeland. Of the credit line of NOK 1.5 billion NOK 473 million had been used as at 31.12.24. The company also has an overdraft facility of NOK 1 500 million (with a maturity of more than one year) granted by SpareBank 1 Helgeland. The overdraft facility is intended to cover payment obligations in the collateral base over a rolling 12-month period, and is completely unused. The agreements have been established according to the arm's length principle. The effects of the facilities are eliminated in the consolidated accounts.

The effects of the facilities are eliminated in the consolidated accounts. SpareBank 1 Helgeland received dividends of NOK 21.5 million in 2024.

### BANKBYGG MO AS (STAKE 99.8%)

The head office in Mo i Rana is leased from Bankbygg Mo AS and the Bank moved back into the premises in spring 2023.

## NOTE 28.2 LOANS TO ELECTED REPRESENTATIVES AND EMPLOYEES

PARENT BANK			GROUP	
31.12.23	31.12.24	(amounts in NOK million)	31.12.24	31.12.23
292	329	Employment	446	414
28	27	The Board of Directors	42	39
40	46	Supervisory Board	73	82
<b>360</b>	<b>402</b>	<b>Total loans to elected representatives and employees</b>	<b>561</b>	<b>535</b>

The interest rate applied to loans to employees was lower than the rate applicable to customers for 2024. This loan benefit amounts to NOK 6.5 million (NOK 6.0 million) calculated on the basis of the maximum loan amount.

## NOTE 29. DEFERRED TAX ASSET

PARENT BANK			GROUP	
31.12.23	31.12.24	Temporary differences:	31.12.24	31.12.23
		<b>Positive temporary differences</b>		
7	7	Other temporary differences	7	7
<b>7</b>	<b>7</b>	<b>Total positive temporary differences</b>	<b>7</b>	<b>7</b>
2	2	Deferred tax	2	2
		<b>Negative temporary differences</b>		
41	31	Change in value, interest-bearing securities	31	41
0	0	Fixed assets	8	16
17	15	Pension liabilities	15	17
28	21	Other differences	21	28
<b>86</b>	<b>67</b>	<b>Total negative temporary differences</b>	<b>75</b>	<b>102</b>
0	0	Loss carried forward	29	21
<b>86</b>	<b>67</b>	<b>Total negative temporary differences</b>	<b>103</b>	<b>123</b>
22	17	Deferred tax asset	26	31
20	15	Net deferred tax asset	24	29

Dividends from the Parent bank to equity certificate holders have no influence on the Group's payable tax or deferred tax.

Deferred tax/tax asset is calculated on the basis of the temporary differences which exist at the end of the financial year between accounting and fiscal values using the debt method. Deferred tax is shown in the accounts on a net basis when the Group has a legal right to offset deferred tax asset against deferred tax in the balance sheet.



## NOTE 30. FIXED ASSETS

PARENT BANK						GROUP	
31.12.24						31.12.24	
Total	Machine- ry, equ- ipment, fixtures and ve- hicles	Buildings and other real property		Buildings and other real property	Machine- ry, equ- ipment, fixtures and ve- hicles	Total	
299	234	66	Acquisition cost as at 01.01	377	239	616	
4	3	1	Additions	33	4	37	
0	0	0	Disposals			0	
<b>303</b>	<b>237</b>	<b>67</b>	<b>Acquisition cost as at 31.12</b>	<b>410</b>	<b>243</b>	<b>652</b>	
261	207	54	Accumulated depreciation and write-downs as at 01.01	145	220	365	
11	11	0	Depreciation for the year	10	11	21	
0	0	0	Disposals, accumulated depreciation and write-downs				
<b>272</b>	<b>218</b>	<b>54</b>	<b>Accumulated depreciation and write-downs as at 31.12</b>	<b>155</b>	<b>231</b>	<b>386</b>	
<b>32</b>	<b>19</b>	<b>13</b>	<b>Book value as at 31.12</b>	<b>254</b>	<b>12</b>	<b>265</b>	
	10-33%	3-4%	Percentage rates for ordinary depreciation	3-4%	10-33%		
	3-10 years	30 years	Useful life *)	30 years	3-10 years		

\*) The useful life of each fixed asset is assumed.

PARENT BANK						GROUP	
31.12.23						31.12.23	
Total	Machine- ry, equ- ipment, fixtures and ve- hicles	Buildings and other real property		Buildings and other real property	Machine- ry, equ- ipment, fixtures and ve- hicles	Total	
282	220	63	Acquisition cost as at 01.01	326	225	551	
17	14	3	Additions	51	14	65	
0	0	0	Disposals	0	0	0	
<b>299</b>	<b>234</b>	<b>66</b>	<b>Acquisition cost as at 31.12</b>	<b>377</b>	<b>239</b>	<b>616</b>	
246	193	54	Accumulated depreciation and write-downs as at 01.01	136	205	341	
15	15	0	Depreciation for the year	9	15	24	
	0	0	Disposals, accumulated depreciation and write-downs				
<b>261</b>	<b>207</b>	<b>54</b>	<b>Accumulated depreciation and write-downs as at 31.12</b>	<b>145</b>	<b>220</b>	<b>365</b>	
<b>39</b>	<b>27</b>	<b>12</b>	<b>Book value as at 31.12</b>	<b>232</b>	<b>19</b>	<b>250</b>	
	10-33%	3-4%	Percentage rates for ordinary depreciation	3-4%	10-33%		
	3-10 years	30 years	Useful life *)	30 years	3-10 years		

\*) The useful life of each fixed asset is assumed.

## NOTE 31. INTANGIBLE ASSETS

PARENT BANK				GROUP		
31.12.24				31.12.24		
Total	Intangible assets	Goodwill		Goodwill	Intangible assets	Total
108	62	46	Acquisition cost as at 01.01	46	62	108
0	0	0	Additions	0	0	0
0	0	0	Disposals	0	0	0
<b>108</b>	<b>62</b>	<b>46</b>	<b>Acquisition cost as at 31.12</b>	<b>46</b>	<b>62</b>	<b>108</b>
25	23	2	Accumulated depreciation and write-downs as at 01.01	2	23	25
10	10	0	Depreciation for the year	0	10	10
0			Disposals, accumulated depreciation and write-downs			
<b>35</b>	<b>33</b>	<b>2</b>	<b>Accumulated depreciation and write-downs as at 31.12</b>	<b>2</b>	<b>33</b>	<b>35</b>
<b>73</b>	<b>29</b>	<b>44</b>	<b>Book value as at 31.12</b>	<b>44</b>	<b>29</b>	<b>73</b>

Intangible assets and goodwill largely relate to the transfer of business in 2021. Intangible assets are depreciated over a period of 5-7 years. Goodwill is evaluated annually and written down if the relevant conditions are met.

PARENT BANK				GROUP		
31.12.23				31.12.23		
Total	Intangible assets	Goodwill		Goodwill	Intangible assets	Total
108	62	46	Acquisition cost as at 01.01	46	62	108
			Additions	0	0	0
			Disposals	0	0	0
<b>108</b>	<b>62</b>	<b>46</b>	<b>Acquisition cost as at 31.12</b>	<b>46</b>	<b>62</b>	<b>108</b>
14	12	2	Accumulated depreciation and write-downs as at 01.01	2	12	14
10	10	0	Depreciation for the year	0	10	10
			Disposals, accumulated depreciation and write-downs			
<b>24</b>	<b>23</b>	<b>2</b>	<b>Accumulated depreciation and write-downs as at 31.12</b>	<b>2</b>	<b>23</b>	<b>25</b>
<b>83</b>	<b>39</b>	<b>44</b>	<b>Book value as at 31.12</b>	<b>44</b>	<b>39</b>	<b>83</b>

## NOTE 32. OTHER ASSETS

PARENT BANK			GROUP	
31.12.23	31.12.24	(amounts in NOK million)	31.12.24	31.12.23
3	3	Sundry suspense accounts	3	3
76	150	Receivables from property/Usufruct leases	7	9
35	25	Prepaid costs	25	36
20	15	Deferred tax asset	24	29
1	0	Reposessed property	0	1
<b>135</b>	<b>193</b>	<b>Total other assets</b>	<b>59</b>	<b>81</b>

## NOTE 33. FOREIGN CURRENCY

### GROUP AND PARENT BANK

The Group has no significant holdings of foreign currency available via ATMs. The Group has no transactions in foreign currency of any significance, but has pledged guarantees for foreign currency loans managed by the currency bank on behalf of SpareBank 1 Helgeland. See Note 2.3.1 Foreign exchange risk.

## NOTE 34. LIABILITIES TO CREDIT INSTITUTIONS

PARENT BANK			GROUP	
31.12.23	31.12.24	(amounts in NOK million)	31.12.24	31.12.23
16	414	Liabilities to credit institutions without agreed maturity	2	20
300	0	Other long-term loans	0	300
<b>316</b>	<b>414</b>	<b>Total liabilities to credit institutions</b>	<b>2</b>	<b>320</b>

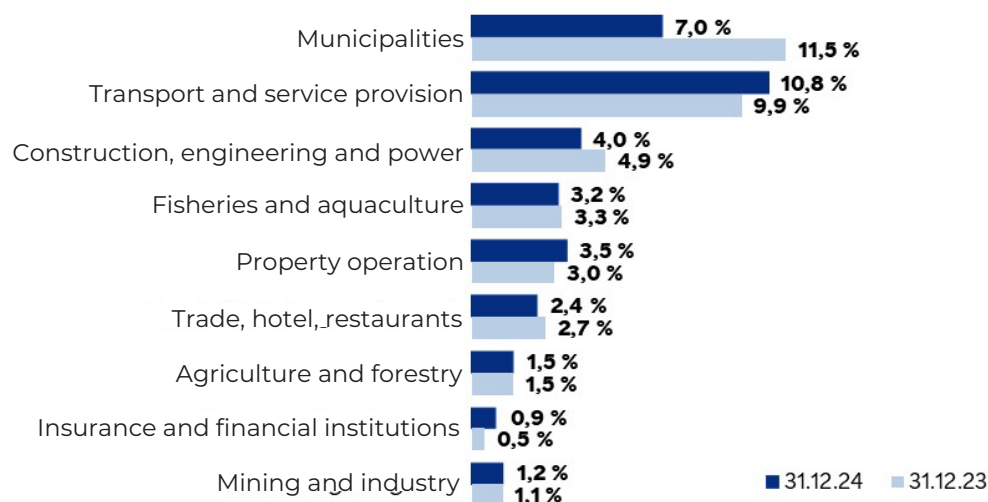
## NOTE 35. DEPOSITS FROM CUSTOMERS

### NOTE 35.1 DEPOSITS FROM CUSTOMERS BY SECTOR/INDUSTRY

PARENT BANK					GROUP			
%	31.12.23	%	31.12.24	Deposits by sector/industry	31.12.24	%	31.12.23	%
2.1%	520	0.9%	234	Insurance and finance	234	0.9%	112	0.5%
11.3%	2 835	7.0%	1 751	Municipalities and municipal enterprises	1 751	7.0%	2 835	11.5%
1.5%	367	1.5%	386	Agriculture and forestry	386	1.5%	367	1.5%
3.2%	809	3.2%	795	Fisheries and aquaculture	795	3.2%	809	3.3%
1.1%	276	1.2%	295	Mining and industry	295	1.2%	276	1.1%
4.8%	1 203	4.0%	1 000	Construction, engineering and power	1 000	4.0%	1 203	4.9%
2.7%	667	2.4%	611	Trade, hotel, restaurants	611	2.4%	667	2.7%
9.7%	2 435	10.8%	2 717	Transport and services	2 717	10.8%	2 435	9.9%
3.2%	807	3.5%	888	Property operation	876	3.5%	742	3.0%
39.4%	9 919	34.6%	8 677	Business	8 665	34.6%	9 446	38.3%
60.6%	15 239	65.4%	16 403	Retail market	16 403	65.4%	15 237	61.7%
<b>100.0%</b>	<b>25 156</b>	<b>100.0%</b>	<b>25 080</b>	<b>Total</b>	<b>25 068</b>	<b>100.0%</b>	<b>24 683</b>	<b>100.0%</b>

The Act relating to security arrangements for banks and public administration, etc. by financial institutions requires all savings banks to be a member of the Norwegian Banks' Guarantee Fund. The fund is obliged to cover losses suffered by a depositor on deposits in a member institution of up to NOK 2 million of the collective deposit.

### Deposit distribution CM of total deposits



### DEPOSITS FROM CUSTOMERS AS AT 31.12.24 (GROUP)

Deposits from customers amount to NOK 25.1 billion (NOK 24.7 billion), of which NOK 8.7 billion (NOK 9.4 billion) has been loaned to corporate customers. The graph above shows the sector distribution, with growth in the transport and service sectors. The share of retail market deposits amounts to 65.4% (61.7%). Of the deposits, 88.7% (91.7%) consist of deposits from customers in Helgeland.

## NOTE 35.2 GEOGRAPHICAL DISTRIBUTION OF DEPOSITS FROM CUSTOMERS

PARENT BANK			GROUP	
31.12.24	% share		31.12.24	% share
22 253	88.7%	Helgeland	22 243	88.7%
2 604	10.4%	Rest of Norway	2 603	10.4%
223	0.9%	International	223	0.9%
<b>25 080</b>	<b>100.0%</b>	<b>Total</b>	<b>25 068</b>	<b>100.0%</b>

PARENT BANK			GROUP	
31.12.23	% share		31.12.23	% share
23 153	92.0%	Helgeland	22 680	91.9%
1 788	7.1%	Rest of Norway	1 788	7.2%
215	0.9%	International	215	0.9%
<b>25 156</b>	<b>100.0%</b>	<b>Total</b>	<b>24 683</b>	<b>100.0%</b>

## NOTE 35.3 DEPOSITS FROM CUSTOMERS, DIFFERENT FORMS OF DEPOSIT

PARENT BANK			GROUP	
31.12.23	31.12.24		31.12.24	31.12.23
11 165	11 129	Ordinary conditions without notice of termination or agreed maturity	11 117	11 100
11 810	11 474	Special conditions for customer deposits without agreed maturities	11 474	11 402
1 751	1 914	Special conditions for customer deposits with agreed maturity	1 914	1 751
430	563	Liquid deposits from customers with agreed maturity	563	430
<b>25 156</b>	<b>25 080</b>	<b>Total deposits from and liabilities to customers</b>	<b>25 068</b>	<b>24 683</b>

## NOTE 36. LIABILITIES ESTABLISHED THROUGH THE ISSUING OF SECURITIES

PARENT BANK			GROUP	
31.12.23	31.12.24		31.12.24	31.12.23
2 661	4 320	Bond loans	7 879	6 109
0	0	Own bonds	0	-10
<b>2 661</b>	<b>4 320</b>	<b>Total liabilities established through the issuing of securities</b>	<b>7 879</b>	<b>6 099</b>

All debt securities are in NOK.

## NOTE 36.1 SPECIFICATION OF BOND LOANS

				GROUP
				31.12.24
	Maturity	Debt securities	Own portfolio	Net nominal
Bond loans, FRN	2025	1 076	0	1 076
Bond loans, FRN	2026	500	0	500
Bond loans, fixed-rate	2026	500	0	500
Bond loans, FRN	2027	1 000	0	1 000
Bond loans, fixed-rate	2028	500	0	500
Bond loans, FRN	2028	500	0	500
Bond loans, fixed-rate	2029	500	0	500
Bond loans, FRN	2029	1 000	0	1 000
Bond loans, FRN	2030	1 800	0	1 800
Total bond loans	2032	500	0	500
Bond loans, fixed-rate				
<b>Total bond loans</b>				

## GROUP

31.12.23

	Maturity	Debt securities	Own portfolio	Net nominal
Bond loans, fixed-rate	2024	130	0	130
Bond loans, FRN	2024	979	10	969
Bond loans, FRN	2025	2 000	0	2000
Bond loans, FRN	2026	500	0	500
Bond loans, fixed-rate	2026	500	0	500
Bond loans, FRN	2027	500	0	500
Bond loans, fixed-rate	2028	500	0	500
Bond loans, FRN	2028	500	0	500
Bond loans, fixed-rate	2029	500	0	500
<b>Total bond loans</b>		<b>6 109</b>	<b>10</b>	<b>6 099</b>

## FINANCING

Liquidity risk is reduced by spreading securities debt across different markets, funding sources, instruments and maturities. The Group's share of long-term funding as at 31.12.24 was 86.3% (78.1%).

Covered bonds are included in the Group's debt securities in the amount of NOK 3.5 billion (NOK 3.4 billion). The loan-to-value ratio of the collateral base is 51% (50%). Deposits are an important source of funding and the Group has a good deposit-to-loan ratio.

## SPECIFICATION OF BOND LOANS

## PARENT BANK

31.12.24

	Maturity	Debt securities	Own portfolio	Net nominal
Bond loans, FRN	2025	296	0	296
Bond loans, FRN	2026	500	0	500
Bond loans, fixed-rate	2026	500	0	500
Bond loans, FRN	2027	1 000	0	1 000
Bond loans, fixed-rate	2028	500	0	500
Bond loans, FRN	2029	500	0	500
Bond loans, FRN	2030	1 000	0	1 000
<b>Total bond loans</b>		<b>4 296</b>	<b>0</b>	<b>4 296</b>



## PARENT BANK

31.12.23

	Maturity	Debt securities	Own portfolio	Net nominal
Bond loans, fixed-rate	2024	130	0	130
Bond loans, FRN	2025	500	0	500
Bond loans, FRN	2026	500	0	500
Bond loans, fixed-rate	2026	500	0	500
Bond loans, FRN	2027	500	0	500
Bond loans, fixed-rate	2028	500	0	500
<b>Total bond loans</b>		<b>2 630</b>	<b>0</b>	<b>2 630</b>

## PARENT BANK

## GROUP

31.12.23	31.12.24		31.12.24	31.12.23
2 630	4 296	Bond loans	7 877	6 099
14	-4	Value adjustment	-56	-30
17	29	Accrued interest	58	30
<b>2 661</b>	<b>4 320</b>	<b>Total debt securities</b>	<b>7 879</b>	<b>6 099</b>

## GROUP

Change in total debt securities	31.12.23	Issued	Matured/redeemed	Other changes	31.12.24
Bond loans, nominal value	6 099	5 011	-3 234	0	7 876
Value adjustment	-30			-26	-56
Accrued interest	30			28	58
<b>Total</b>	<b>6 099</b>			<b>1</b>	<b>7 878</b>

## GROUP

Change in total debt securities	31.12.22	Issued	Matured/redeemed	Other changes	31.12.23
Bond loans, nominal value	7 507	2 714	-4 122	0	6 099
Value adjustment	-62			32	-30
Accrued interest	31			-1	30
<b>Total</b>	<b>7 476</b>			<b>31</b>	<b>6 099</b>

## GROUP

Change in debt securities, amortised cost	31.12.23	Issued	Matured/re-deemed	Other changes	31.12.24
Bonds, amortised cost, nominal value	4 483	4 511	-3 104	-14	5 876
Accrued interest	14			28	42
<b>Total</b>	<b>4 497</b>			<b>14</b>	<b>5 918</b>

Change in debt securities at amortised cost	31.12.22	Issued	Matured/re-deemed	Other changes	31.12.23
Bonds, amortised cost, nominal value	5 729	1 691	-2 929	-9	4 483
Accrued interest	12			4	16
<b>Total</b>	<b>5 741</b>			<b>-5</b>	<b>4 499</b>

## GROUP

Change in debt securities hedging	31.12.23	Issued	Matured/re-deemed	Other changes	31.12.24
Bond loans, hedging nominal value	1 616	500	-130	14	2 000
Value adjustment	-30			-26	-56
Accrued interest	16			0	16
<b>Total</b>	<b>1 602</b>			<b>-12</b>	<b>1 960</b>

## GROUP

Change in debt securities hedging	31.12.22	Issued	Matured/re-deemed	Other changes	31.12.23
Bond loans, hedging nominal value	1 777	1 023	-1 193	9	1 616
Value adjustment	-62			32	-30
Accrued interest	19			-5	14
<b>Total</b>	<b>1 734</b>			<b>36</b>	<b>1 600</b>

## PARENT BANK

Change in debt securities, amortised	31.12.23	Issued	Matured/re-deemed	Other changes	31.12.24
Bonds, amortised cost, nominal value	1 511	2 204	-408	-12	3 295
Accrued interest	6			23	29
<b>Total</b>	<b>1 517</b>				<b>3 324</b>

## PARENT BANK

Change in debt securities, amortised	31.12.22	Issued	Matured/re-deemed	Other changes	31.12.23
Bonds, amortised cost, nominal value	1 650		-131	-8	1 511
Accrued interest	5			1	6
<b>Total</b>	<b>1 655</b>				<b>1 517</b>

## PARENT BANK

Change in debt securities hedging	31.12.23	Issued	Matured/re-deemed	Other changes	31.12.24
Bond loan hedging	-1 120	0	-130	10	1 000
Value adjustments	13			-17	-4
Accrued interest	11			-11	0
<b>Total</b>	<b>1 144</b>			<b>-18</b>	<b>996</b>

## PARENT BANK

Change in debt securities hedging	31.12.22	Issued	Matured/re-deemed	Other changes	31.12.23
Bond loan hedging	1 481	823	-1 193	9	-1 120
Value adjustments	-37			51	13
Accrued interest	18			-7	11
<b>Total</b>	<b>1 462</b>			<b>53</b>	<b>1 144</b>

## PARENT BANK

Change in subordinate loans	31.12.23	Issued	Matured/re-deemed	Other changes	31.12.24
Bonds, amortised cost, nominal value	350	100	0	0	450
Value adjustment	-1				-1
Accrued interest	3				3
<b>Total</b>	<b>352</b>	<b>100</b>	<b>-</b>	<b>0</b>	<b>452</b>

## NOTE 37. OTHER LIABILITIES

## PARENT BANK

## GROUP

31.12.23	31.12.24		31.12.24	31.12.23
35	32	Other current liabilities	11	35
147	153	Tax payable	160	151
<b>182</b>	<b>185</b>	<b>Total other liabilities</b>	<b>171</b>	<b>186</b>
22	24	Accrued holiday pay and employer's National Insurance contributions	24	22
92	166	Lease liabilities	20	31
11	21	Other accrued costs	21	11
<b>125</b>	<b>211</b>	<b>Total accrued costs and prepaid income</b>	<b>65</b>	<b>64</b>
17	15	Net pension liabilities (Note 12)	15	17
7	7	Provision for loss on unused credit, granted not discounted loans and guarantees	7	7
<b>24</b>	<b>22</b>	<b>Total accrued liabilities</b>	<b>22</b>	<b>24</b>
<b>331</b>	<b>418</b>	<b>Total other liabilities</b>	<b>258</b>	<b>274</b>

## NOTE 38. UNUSED DRAWING FACILITIES

### GROUP AND PARENT BANK

	31.12.24	31.12.23
Short-term drawing facility, 1 year	900	900
<b>Total unused drawing rights facilities</b>	<b>900</b>	<b>900</b>

The Group's total liquidity reserves are deemed to be satisfactory.

### GROUP AND PARENT BANK

In addition, the Group has:	31.12.24	31.12.23
Surplus liquidity at Norges Bank as at 31.12	110	66

Bonds at floating interest rates; interest rates are fixed in advance for three months at a time. The Bank's bonds are repaid at maturity; the loans may be repaid earlier if the agreements concerned permit and the Bank so wishes. The Group did not default on borrowed funds during the financial year. This applies to the principal, payment of interest and/or redemption amounts.

### PLEDGED ASSETS

An overview of the Group's pledged assets is presented in Note 43.

### BINDING AGREEMENTS TO ACQUIRE REAL PROPERTY, PLANT AND EQUIPMENT.

The Group has not entered into any significant binding agreements to acquire property, plant or equipment.

### ONGOING LEGAL DISPUTES

The Group is not involved in any legal disputes that are considered to be of any significance as regards the Group's solvency or profitability.

## NOTE 39. SUBORDINATED LOAN CAPITAL AND SUBORDINATED BONDS

### PARENT BANK AND GROUP

Instrument	Year of establishment	Nominal value	Interest rate	Redemption right	Maturity	31.12.24	31.12.23
Subordinated loan	2023	NOK 200 million	3-month NIBOR + 195 bp	Call 11.04.33	16 08 2033	200	200
Subordinated loan	2023	NOK 150 million	3-month NIBOR + 245 bp	Call 16.02.34	16 02 2034	150	150
Subordinated loan	2024	NOK 100 million	3-month NIBOR +250 bp	Call 05.03.25	11 04 2035	100	0
Subordinated bonds	2021	NOK 300 million	3-month NIBOR +250 bp	Call 14.09.31	01.12.2099	300	300
Subordinated bonds	2021	NOK 100 million	3-month NIBOR +260 bp	Call 14.09.31	01.12.2099	100	100
						850	750

## NOTE 40. CAPITAL ADEQUACY

PARENT BANK			GROUP	
31.12.23	31.12.24		31.12.24	31.12.23
5 029	5 197	<b>Total carrying amount, equity</b>	<b>5 222</b>	<b>5 051</b>
-398	-398	Other approved Tier 1 capital (subordinated bonds)	-398	-398
-56	-63	Deduction, investment in SpareBank 1 Betaling	-63	-56
0	0	Deduction, other holdings in financial institutions	0	0
-8	-8	Deduction, responsible valuation	-9	-9
0	0	Deduction, share of earnings not included in Common Equity Tier 1	0	0
-76	-66	Deduction, intangible assets	-66	-76
-357	-279	Deduction, allocated dividends classified as equity	-279	-357
-4	-6	Second deduction	-5	-4
		Effect of proportionate consolidation of Common Equity Tier 1	-146	-126
<b>4 129</b>	<b>4 377</b>	<b>Total Common Equity Tier 1 capital</b>	<b>4 256</b>	<b>4 024</b>
0	0	Deduction, holdings in financial institutions		0
398	398	Other approved Tier 1 capital (subordinated bonds)	398	398
		Effect of proportionate consolidation of Tier 1 capital	55	45
<b>4 528</b>	<b>4 776</b>	<b>Total Tier 1 capital</b>	<b>4 709</b>	<b>4 468</b>
350	450	Subordinated loan capital	450	350
0	0	Deduction, holdings in financial institutions	0	0
		Effect of proportionate consolidation of Tier 2 capital	76	70
<b>350</b>	<b>450</b>	<b>Total supplementary capital</b>	<b>525</b>	<b>420</b>
<b>4 877</b>	<b>5 225</b>	<b>Total net subordinated capital</b>	<b>5 234</b>	<b>4 888</b>
18 699	20 544	Risk-weighted balance	23 905	22 090
22.08%	21.28%	Common Equity Tier 1 ratio in %	17.80%	18.22%
24.21%	23.21%	Tier 1 capital ratio in %	19.70%	20.23%
26.08%	25.40%	Total capital adequacy as a %	21.90%	22.13%
14.00%	14.00%	Minimum requirement concerning Common Equity Tier 1 capital incl. buffer requirement and Pillar II supplement as a %	15.24%	15.24%
15.50%	15.50%	Minimum requirement concerning Tier 1 capital ratio incl. buffer requirement and Pillar II supplement as a %	17.15%	17.15%
17.50%	17.50%	Minimum requirement incl. buffer requirement and Pillar II supplement as a %	19.70%	19.70%
3 272	3 601	Minimum requirement concerning subordinated capital incl. buffer requirement and Pillar II supplement	4 709	4 352
1 605	1 625	Available subordinated capital in accordance with buffer requirements and Pillar II supplement	525	536
38 207	40 432	Unweighted calculation basis	51 310	48 923
11.9%	11.8%	Leverage ratio	9.2%	9.1%

With effect from 31.12.23, the statutory minimum requirement for the Common Equity Tier 1 ratio is 14.0%. The Bank has a Pillar 2 supplement of 2.2%. The target figures for the Common Equity Tier 1 capital ratio and total capital adequacy are 1.3 percentage points above the regulatory requirements, which currently amount to 16.5% and 21.0%, respectively. The Group's risk weighted assets amounted to NOK 48 575 million, which represented a leverage ratio of 9.2% at the end of the year.

SpareBank 1 Helgeland uses the standard method for calculating credit risk and the basic method for calculating operational risk. As at 31.12.24, SpareBank 1 Boligkreditt, Kredittbanken ASA and SpareBank 1 Finans Nord-Norge are included in the proportionate consolidation.

PARENT BANK			GROUP	
31.12.23	31.12.24	Calculation basis	31.12.24	31.12.23
5	3	States and central banks	3	5
184	229	Local and regional authorities	229	184
507	483	Institutions	286	245
1 823	1 945	Enterprises	1 948	1 825
2 442	2 060	Mass market commitments	2 091	2 524
8 719	10 192	Commitments secured through real property	11 526	10 113
417	426	Commitments overdue	428	417
606	580	Covered bonds	232	272
177	283	High-risk commitment	283	177
0	0	Units in securities funds	0	0
1 768	1 918	Equity positions	1 271	-1 120
196	267	Other commitments	391	399
<b>16 843</b>	<b>18 387</b>	<b>Calculation basis, credit risk</b>	<b>18 688</b>	<b>17 280</b>
1 829	2 168	Calculation basis, operational risk	2 227	1 841
28	19	CVA supplement	28	41
0	0	Other deductions from/additions to the calculation basis	0	0
<b>18 699</b>	<b>20 575</b>	<b>Risk-weighted balance</b>	<b>20 943</b>	<b>19 162</b>
		Proportional share, calculation basis, collaborating groups	3 742	3 629
		Deduction, internal elimination, collaborating groups	-780	-701
		<b>Risk-weighted balance after proportionate consolidation</b>	<b>23 905</b>	<b>22 090</b>

## NOTE 41. EQUITY CERTIFICATES

### NOTE 41.1 DISTRIBUTION OF EQUITY CERTIFICATES

#### PARENT BANK

31.12.24

Breakdown by number of equity certificates	Equity certificate holders		Equity certificates	
	Quantity	Share %	Quantity	Share %
1–1 000	2 187	70.7%	666 778	2.5%
1 001–10 000	796	25.7%	2 392 270	8.9%
10 001–50 000	87	2.8%	1 762 611	6.5%
50 001–100 000	8	0.3%	624 143	2.3%
> 100 001	17	0.5%	21 554 328	79.8%
<b>Total</b>	<b>3 095</b>	<b>100.0%</b>	<b>27 000 130</b>	<b>100.0%</b>



31.12.23

Breakdown by number of equity certificates	Equity certificate holders		Equity certificates	
	Quantity	Share %	Quantity	Share %
1–1 000	2 003	70.9%	611 333	2.3%
1 001–10 000	706	25.0%	2 078 154	7.7%
10,001 – 50,000	83	2.9%	1 597 618	5.9%
50 001–100 000	11	0.4%	767 075	2.8%
100 001 – 500 000	22	0.8%	21 945 950	81.3%
<b>Total</b>	<b>2 825</b>	<b>100.0%</b>	<b>27 000 130</b>	<b>100.0%</b>

**TRADING IN HELGELAND SPAREBANK'S EQUITY CERTIFICATES**

The price as at 31.12.24 was NOK 145 (NOK 130) per equity certificate.

Sparebankstiftelsen Helgeland is the largest owner, with 28.1% of the equity certificates in HELG.

**MARKET-MAKING AGREEMENT**

SpareBank 1 Helgeland has entered into a market-making agreement relating to trading in the Bank's equity certificates. The purpose of this agreement is to secure liquidity and even out supply and demand, and to contribute to the marketing of the equity certificates. The agreement also means that, wherever possible, the difference between buying and selling prices will be kept to a maximum of four percentage points, rounded up or down to the nearest amount. The difference may nevertheless be kept smaller if the market interest should warrant it. The pricing should at all times reflect the market's assessment of the Bank's equity certificate.

**RETURNS AND DIVIDEND POLICY**

It is a priority area to practise sound management of our equity, inter alia, by practising an ownership policy which helps to create better liquidity in the equity certificates. The Bank wishes to maintain an open dialogue with equity certificate holders and other market operators. It is the Bank's belief that providing accurate and relevant information at the right time creates confidence and predictability and contributes to the correct pricing of SpareBank 1 Helgeland's equity certificate. In any event that involves an obligation on the Bank's part to provide information, a report will be sent to Oslo Stock Exchange and then posted on the Bank's website. The Bank has been listed on the stock exchange since 2000 and has complied with the requirements for reporting and information that the stock exchange requires of listed companies. The Bank's ticker is HELG.

The Board has recommended a dividend ratio of 50% (75%). Time-weighted ownership ratio of 79.9% as at 31.12.24 and 79.9% as at 31.12.23.

**NOTE 41.2 EQUITY CERTIFICATE CAPITAL**

According to the Bank's dividend policy, half or more of the equity capital's share of the profit may be paid out as dividends, and half or more of the primary capital's share of the profit may be paid out in the form of gifts or transferred to one or more foundations. The remainder of the profit will be transferred to the equalisation fund and primary capital. The Bank has a strategy of having a long-term and predictable dividend policy.

Equity certificate capital amounts to NOK 258 million (NOK 266 million) and is divided between approximately 3 095 owners.

## NOTE 41.3 THE 20 LARGEST OWNERS

As at 31.12.24	Quantity	% share	PARENT BANK		
			Quantity	% share	
Sparebankstiftelsen Helgeland	7 588 922	28.1%	Lamoholmen invest AS	211 850	0.8%
SpareBank 1 Nord-Norge	5 397 325	20.0%	Skandinaviska Enskilda Banken AB	188 552	0.7%
Skandinaviska Enskilda Banken AB	2 194 108	8.1%	U.S Bank National Association	188 222	0.7%
J.P. Morgan SE	1 650 566	6.1%	Nima Invest AS	171 614	0.6%
VPF Eika equity certificate	1 337 249	5.0%	J.P. Morgan SE	130 000	0.5%
J.P. Morgan SE	649 728	2.4%	Intertrade Shipping AS	120 500	0.4%
Spesialfondet Borea utbytte	547 676	2.0%	Nervik Ann Kristin	120 000	0.4%
Kommunal Landspensjonskasse	441 971	1.6%	SpareBank 1 Helgeland	94 596	0.4%
MP Pensjon PK	363 399	1.3%	Hjellegjerde Invest AS	92 308	0.3%
Catilina Invest AS	252 646	0.9%	KBC Bank NV	82 590	0.3%
<b>Total 10 largest owners</b>	<b>20 423 590</b>	<b>75.6%</b>	<b>Total 20 largest owners</b>	<b>21 823 822</b>	<b>80.8%</b>

The Bank has issued a total of 27 000 130 equity certificates at a nominal value of NOK 10.

As of 31.12.23	Quantity	% share	PARENT BANK		
			Quantity	% share	
Sparebankstiftelsen Helgeland	7 588 922	28.11%	VPF Nordea Avkastning	298 061	1.1%
SpareBank 1 Nord-Norge	5 397 325	20.0%	Bergen kommunale pensjonskasse	277 749	1.0%
Pareto Invest AS	2 139 108	7.9%	Catilina Invest AS	252 646	0.9%
VPF Eika egenkapital	1 317 521	4.5%	U.S Bank National Association	215 146	0.9%
Verdipapirfondet Nordea Norge Verd	1 006 616	3.7%	Lamoholmen invest AS	211 850	0.8%
Spesialfondet Borea Utbytte	561 035	2.2%	Skandinaviska Enskilda Banken AB	188 552	0.7%
J.P. Morgan Bank Luxembourg S.A.	529 959	1.8%	Nima Invest AS	171 614	0.6%
Helgeland Kraft AS	390 925	1.4%	VPF Nordea Norge Plus	156 689	0.6%
MP Pensjon PK	388 399	1.4%	VPF Nordea Kapital	139 174	0.6%
Kommunal Landspensjonskasse	356 528	1.3%	Vigner Olaisen AS	122 631	0.5%
<b>Total 10 largest owners</b>	<b>19 676 338</b>	<b>72.4%</b>	<b>Total 20 largest owners</b>	<b>21 710 450</b>	<b>80.3%</b>

The Bank has issued a total of 27 000 130 equity certificates at a nominal value of NOK 10.

## NOTE 41.4 DIVIDENDS

	PARENT BANK	
	31.12.24	31.12.23
Basis for calculating dividends		
Equity in the balance sheet (not reworked)	5 197	5 029
Subordinated bonds	-398	-398
Provisions for dividends and donations classified as equity	-285	-360
Total adjusted equity	4 514	4 270
Equity certificate capital	270	270
Share premium reserve	1 505	1 505
Share of fund for valuation differences	18	14
Equalisation fund	1 831	1 626
Total	3 624	3 415
Equity certificate percentage as at 01.01	79.9	79.7%
Weighted average	79.9	79.9%
Equity certificate percentage as at 31.12	79.9	79.9%
Calculation of dividend:		
The Parent bank's profit for the year	569	500
Interest on subordinated bonds	-22	-21
Transferred to reserve for unrealised gains	-6	7
Dividend basis	540	485
Dividend in NOK million	228	291
Equalisation fund, NOK	204	97
Earnings per equity certificate in NOK Parent Bank (Group)	16.0	14.2 (13.9)
Of which cash dividends in NOK	8.4	10.8
*Of which to equalisation fund in NOK	7.6	3.6

## NOTE 41.5 KEY FIGURES, EQUITY CERTIFICATES

PARENT BANK			GROUP	
31.12.23	31.12.24		31.12.24	31.12.23
130	145	Stock exchange price	145	130
9.2	8.9	P/E (stock exchange price as at 31.12 divided by profit per equity certificate)	8.9	9.3
1.0	1.0	P/B (stock exchange price as at 31.12 divided by book value of equity per equity certificate)	1.0	0.9
79.9	79.9	Equity certificate ratio as at 31.12	79.9	79.9
137	142	Equity per equity certificate, in NOK	145	138
14.2	16.2	Earnings per equity certificate, in NOK	16.2	13.9

## NOTE 42. GUARANTEE LIABILITIES BY GUARANTEE TYPE

PARENT BANK			GROUP	
31.12.23	31.12.24		31.12.24	31.12.23
120	117	Payment guarantees	117	120
125	114	Contract guarantees	114	125
22	43	Loan guarantees	43	22
32	33	Other guarantee liabilities	33	32
<b>299</b>	<b>307</b>	<b>Total guarantee liabilities *</b>	<b>307</b>	<b>299</b>

\*) Adjustment to fair value is not included in the balance sheet, as the change in value is insignificant.

The amounts of NOK 15.0 million (2022) and NOK 18.0 million (2021) were deposited in the deposit guarantee fund and the crisis fund.

## NOTE 43. PLEDGED ASSETS

PARENT BANK			GROUP	
31.12.23	31.12.24		31.12.24	31.12.23
		<b>Bonds pledged as collateral security for</b>		
574	599	D-loan with Norges Bank	599	574
<b>574</b>	<b>599</b>	<b>Total assets pledged as collateral</b>	<b>599</b>	<b>574</b>

## NOTE 44. EVENTS AFTER THE BALANCE SHEET DATE

### GROUP AND PARENT BANK

There have been no significant events since the balance sheet date which have affect the accounts. It is proposed to distribute a cash dividend of NOK 228 million (NOK 291 million) of the profit for the year to equity certificate holders in SpareBank 1 Helgeland. Furthermore, it is proposed to transfer NOK 80 million (NOK 101 million) to the gift fund/gift foundation. The proposal had not been adopted as at the balance sheet date (31.12) and the items are therefore not recognised as debt, but are included in equity.

## NOTE 45. BALANCE SHEET DIVIDED INTO CURRENT AND NON-CURRENT ITEMS

PARENT BANK			GROUP	
31.12.23	31.12.24		31.12.24	31.12.23
		Assets		
83	124	Cash and receivables, central banks	124	83
1 865	1 813	Loans to and receivables from credit institutions	1 340	842
3 050	3 129	Loans to and receivables from customers	3 887	3 684
1 281	1 317	Certificates, bonds and shares	1 367	1 431
135	193	Other assets	59	80
<b>6 414</b>	<b>6 576</b>	<b>Total current assets</b>	<b>6 777</b>	<b>6 120</b>
21 904	24 274	Loans to and receivables from customers	27 456	25 519
64	30	Financial derivatives	30	64
4 585	4 074	Certificates, bonds and shares	4 174	4 682
142	198	Investments in associated companies	198	142
648	648	Investments in subsidiaries	0	0
83	73	Intangible assets	73	83
39	32	Fixed assets held for sale	265	250
<b>27 465</b>	<b>29 329</b>	<b>Total non-current assets</b>	<b>32 196</b>	<b>30 740</b>
<b>33 879</b>	<b>35 905</b>	<b>Total assets</b>	<b>38 973</b>	<b>36 860</b>
		Liabilities and equity		
316	414	Liabilities to credit institutions	2	320
24 726	24 517	Deposits from and liabilities to customers	24 505	24 253
130	296	Liabilities established through the issuing of securities	1 076	1 099
331	418	Other liabilities	258	274
<b>25 504</b>	<b>25 645</b>	<b>Total current liabilities</b>	<b>25 841</b>	<b>25 946</b>
		Liabilities to credit institutions		
430	563	Fixed-rate deposits	563	430
2 883	4 477	Liabilities established through the issuing of securities	7 255	5 352
33	23	Financial derivatives	92	81
<b>3 346</b>	<b>5 062</b>	<b>Total non-current liabilities</b>	<b>7 910</b>	<b>5 863</b>
<b>28 850</b>	<b>30 707</b>	<b>Total liabilities</b>	<b>33 751</b>	<b>31 809</b>
3 397	3 594	Total equity share capital	3 594	3 397
925	904	Total primary capital	904	926
707	699	Total other equity	724	729
<b>5 029</b>	<b>5 197</b>	<b>Total equity</b>	<b>5 222</b>	<b>5 051</b>
	-	Non-controlling interests		
<b>33 879</b>	<b>35 905</b>	<b>Total liabilities and equity</b>	<b>38 973</b>	<b>36 860</b>

## NOTE 46. SPAREBANK 1 HELGELAND - STATEMENT FROM THE BOARD OF DIRECTORS AND THE CEO

We confirm that, to the best of our knowledge, the financial statements for the period 01.01.24 to 31.12.24 have been prepared in accordance with current applicable accounting standards and, in our best judgement, provide a true and fair view of the assets, liabilities, financial position and profit or loss of the entity and the Group taken as a whole.

We also confirm that, in our best judgement, the management report presents a true and fair review of the development and performance of the business and the position of the entity and the Group, together with a description of the principal risks and uncertainties facing the entity and the Group.

### Board of Directors for SpareBank 1 Helgeland

Mo i Rana, 27.02. 2025

Bjørn Krane  
*Chair*

Siw Moxness  
*Vice Chair*

Marianne Terese Steinmo  
*Board Member*

Geir Andreassen  
*Board member*

Yngve Myhre  
*Board member*

Ann-Helen Baadstrand  
*Board member*

Kenneth Normann  
*Employee-elected board member*

Solrun Johansen  
*Employee-elected board member*

Hanne Nordgaard  
*Chief Executive Officer*

Documents are approved electronically



## NOTE 47. NET INCOME AS A PERCENTAGE OF AVERAGE TOTAL ASSETS

31.12.23	31.12.24		31.12.24	31.12.23
5.29	6.07	Interest income and other similar income	6.08	5.29
2.48	3.23	Interest expenses and other similar costs	3.40	2.68
<b>2.81</b>	<b>2.84</b>	<b>Net interest and credit commission income<sup>2</sup></b>	<b>2.68</b>	<b>2.61</b>
0.50	0.55	Commission income and income from banking services	0.51	0.45
0.05	0.05	Commission expenses and costs attributable to banking services	0.04	0.04
0.03	0.03	Other operating income	0.02	0.02
<b>0.48</b>	<b>0.53</b>	<b>Net commission income and other operating income</b>	<b>0.48</b>	<b>0.43</b>
<b>0.17</b>	<b>0.18</b>	<b>Dividends</b>	<b>0.11</b>	<b>0.07</b>
<b>0.00</b>	<b>0.06</b>	<b>Net result earnings from joint arrangements</b>	<b>0.06</b>	<b>0.00</b>
<b>-0.04</b>	<b>0.04</b>	<b>Net income from other financial investments and liabilities</b>	<b>0.03</b>	<b>-0.03</b>
<b>0.12</b>	<b>0.28</b>	<b>Net income from financial assets and liabilities</b>	<b>0.20</b>	<b>0.04</b>
0.54	0.58	Personnel costs	0.53	0.49
0.67	0.67	Other operating costs	0.60	0.60
<b>1.21</b>	<b>1.24</b>	<b>Total operating costs</b>	<b>1.13</b>	<b>1.10</b>
<b>2.20</b>	<b>2.41</b>	<b>Net income before loss</b>	<b>2.24</b>	<b>1.99</b>
0.29	0.29	Impairments on loans, guarantees, etc.	0.27	0.27
<b>1.91</b>	<b>2.12</b>	<b>Net income before tax</b>	<b>1.97</b>	<b>1.72</b>
0.45	0.48	Tax on ordinary result	0.46	0.42
<b>1.46</b>	<b>1.64</b>	<b>Net profit</b>	<b>1.51</b>	<b>1.30</b>

## NOTE 48. OTHER KEY FIGURES

PARENT BANK					GROUP			
2021	2022	2023	2024	(figures in NOK million and %)	2024	2023	2022	2021
33 953	34 601	33 879	35 905	Total assets as at 31.12 8	38 973	36 860	38 624	39 433
38 534	40 973	42 438	44 460	Total assets including transferred to credit institutions	47 528	45 419	44 996	44 014
30 037	34 253	34 240	34 678	Average total assets <sup>10</sup>	37 685	37 719	39 027	35 740
25 452	25 951	25 173	27 677	Gross lending <sup>4</sup>	30 619	29 423	30 975	32 424
30 033	32 323	33 732	36 232	Gross lending including transferred to credit institutions <sup>4</sup>	39 174	37 981	37 347	37 005
94.9%	98.4%	99.9%	90.6%	Deposit-to-loan ratio as a percentage of gross lending <sup>5</sup>	81.9%	83.9%	81.1%	72.6%
62.8%	62.6%	58.2%	60.3%	Loans to retail market customers	65.6%	64.7%	68.8%	70.6%
24.1%	2.0%	-3.0%	9.9%	Growth in gross lending <sup>6</sup>	4.1%	-5.0%	-4.5%	17.1%
46.4%	7.6%	4.4%	7.4%	Growth in gross lending including transferred to credit institutions <sup>6</sup>	5.8%	1.7%	0.9%	33.6%
26.4%	5.8%	-1.5%	-0.3%	Growth in customer deposits <sup>7</sup>	1.6%	-1.8%	6.7%	26.1%
20.9%	22.2%	22.1%	21.4%	Common Equity Tier 1 capital ratio <sup>21</sup>	17.8%	18.4%	19.0%	18.0%
23.1%	24.5%	24.2%	23.4%	Tier 1 capital ratio <sup>21</sup>	19.7%	20.4%	21.1%	19.9%
25.5%	26.9%	26.1%	25.6%	Capital adequacy <sup>21</sup>	21.9%	22.3%	23.5%	22.2%
10.4%	11.0%	11.9%	11.8%	Leverage ratio <sup>22</sup>	9.2%	9.2%	9.2%	9.4%
13.6%	14.2%	14.8%	14.5%	Equity ratio	13.4%	13.7%	12.8%	11.7%
5.9%	10.9%	10.7%	12.3%	Return on equity exc. hybrid capital <sup>1</sup>	11.8%	10.4%	9.9%	5.4%
0.6%	1.4%	1.5%	1.6%	Return on assets	1.5%	1.3%	1.2%	0.5%
131	120	130	145	Stock exchange price, NOK per equity certificate	145	130	120	131
22.4	8.7	9.2	8.9	P/E <sup>19</sup>	8.9	9.3	9.4	24.2
1.1	0.9	1.0	1.0	P/B <sup>20</sup>	1.0	0.9	0.9	1.0
79.9	79.9	79.9	79.9	Ownership ratio as at 31.12 <sup>18</sup>	79.9	79.9	79.9	79.9
123	134	137.0	142.0	Equity per equity certificate <sup>17</sup>	145.0	138.0	135	125
5.8	13.8	14.2	16.2	Earnings per equity certificate, in NOK <sup>16</sup>	16.2	13.9	12.8	5.4
5.8	13.8	14.2	16.2	Comprehensive income per equity certificate, in NOK	16.2	13.9	12.8	5.4
3.2	10.3	10.8	8.43	Cash dividend, in NOK				
3.2	3.4	3.4	7.55	Allocated to equalisation fund				
1.3	1.1	1.2	1.2	Costs as a percentage of average total assets	1.1	1.1	1.0	1.1
54.4	38.2	36.8	34.1	Costs as a percentage of income <sup>3</sup>	33.6	36.0	39.9	53.9
165	156	165	170	Number of FTEs	170	165	156	165
				As percentage of gross loans:				
0.6	0.5	1.0	1.4	Net default and doubtful commitments <sup>13, 14, 15</sup>	1.3	0.9	0.4	0.5
1.0	0.6	0.5	1.0	Total impairments	0.2	0.5	0.5	0.7
0.2	0.1	0.4	0.4	Losses on commitments	0.2	0.3	0	0.2

## NOTE 49. CALCULATIONS

PARENT BANK				GROUP				
2021	2022	2023	2024	(figures in NOK million and %)	2024	2023	2022	2021
				<b>Operating costs, adjusted for non-recurring effects</b>				
385	373	415	432	Operating costs	427	414	381	384
-53	0	0	0	Non-recurring effects	0	0	0	-53
<b>332</b>	<b>381</b>	<b>415</b>	<b>432</b>	<b>Operating costs, adjusted for non-recurring effects</b>	<b>427</b>	<b>414</b>	<b>381</b>	<b>331</b>
1.11%	1.09%	1.21%	1.25%	Operating costs as an average total assets adjusted for non-recurring effects, excl. financial income	1.13%	1.10%	0.98%	0.93%
46.9%	38.2%	36.8%	34.1%	Operating costs as a percentage of income, adjusted for non-recurring effects, excl. financial income	33.6%	36.0%	39.9%	46.5%
216	480	500	569	Net profit	571	490	445	205
-12	-12	-21	-22	Interest paid, subordinated bonds	-22	-21	-12	-12
204	468	479	547	Profit inc. interest, subordinated bonds	549	469	432	193
53	0	0	0	Non-recurring effects	0	0	0	53
257	468	479	547	Income inc. interest, subordinated bonds and non-recurring effects	549	469	432	246
4 017	4 683	4 886	5 015	Average equity	5 033	4 906	4 725	4 099
-325	-398	-398	-398	Average subordinated bonds classed as equity	-398	-398	-398	-325
3 692	4 272	4 488	4 617	Average equity exc. subordinated bonds classified as equity	4 635	4 508	4 327	3 774
6.4%	10.3%	9.8%	10.9%	Return on equity	10.9%	9.6%	9.4%	6.0%
6.9%	10.9%	10.7%	11.8%	Return on equity, adjusted for non-recurring effects and subordinated bonds	11.8%	10.4%	10.0%	6.5%
216	480	500	569	Net profit	571	490	445	205
30 037	34 253	34 240	34 678	Average total assets	37 685	37 719	39 034	35 740
0.7%	1.4%	1.5%	1.6%	Return on assets	1.5%	1.3%	1.1%	0.6%
0.9%	1.4%	1.4%	1.6%	Return on assets, adjusted for subordinated bonds and non-recurring effects	1.5%	1.2%	1.1%	0.7%
4 290	4 415	4 528	4 776	Tier 1 capital	4 710	4 468	4 390	4 400
41 081	40 192	38 207	40 432	Unweighted calculation basis	51 310	48 575	47 711	46 623
10.4%	11.0%	11.9%	11.8%	Leverage ratio	9.2%	9.2%	9.2%	9.4%

## ALTERNATIVE PERFORMANCE MEASURES (APMS)

In both the Board's report and accounting presentations, SpareBank 1 Helgeland uses alternative performance measures (APMs) for the purpose of giving a true and fair view of the Bank's financial development and position to ensure that information is accurate. Key figures that are regulated in IFRS or other legislation are not defined as APMs. The same applies to non-financial information. APMs that are presented as part of the accounting part of the reports are essentially exempt from the APM guidelines, but are included in the overview below insofar as they are not defined in the financial statements. The reason for presenting adjusted results is to bring out the underlying operation in a better way and is not intended to replace ordinary reporting.

### DEFINITIONS OF KEY FIGURES:

- 1.) **Return on equity.** Reason for use: This key figure indicates the return on the Group's equity. The key figure reflects the Group's ability to convert the capital into profitable operations. Definition: Return on equity (comprehensive income after tax) is calculated by dividing the profit/loss for the period for the financial year by the average equity for the past year. In the case of information on return on equity for more than one period, the profit for the period is annualised.
- 2.) **Net interest income.** Reason for use: Net interest income is a commonly used key figure within the banking/finance sector and reflects the Bank's net interest income as a percentage of average total assets. Definition: Net interest income is the difference between gross interest income and interest expenses – net interest income in the summary of financial results. Net interest income is annualised in the interim reports.
- 3.) **cost/income ratio.** Reason for use: The cost/income ratio is a commonly used key figure in the banking/finance sector. The key figure reflects how effectively the Bank/Group is operating. Definition: The cost/income ratio reflects the ability of the Bank/Group to convert its operating costs into income generation. The cost/income ratio is calculated by dividing total operating costs by total income.
- 4.) **Gross lending, Group (including transfers to mortgage credit institutions):** Reason for use: the Bank wholly owns Helgeland Boligkreditt and the key figure reflects the Bank's total lending volume. Definition: Lending volume including amount transferred from the mortgage credit institution.
- 5.) **Deposit-to-loan ratio.** Reason for use: Deposit-to-loan ratio is a commonly used key figure in the banking/finance sector. The key figure indicates the proportion of the Bank's lending activities that are financed by deposits from customers. Definition: The deposit-to-loan ratio reflects the Bank's ability to finance lending to customers through deposits from customers. The deposit-to-loan ratio is calculated by dividing total deposits from customers by gross lending, excluding transfers to the Parent bank's credit institution but including transfers to the Group's credit institution.
- 6.) **Loan growth in the last 12 months (incl. transfers to mortgage credit institutions):** Reason for use: Lending growth over the last 12 months is a normal key figure in banking/finance. The key figure reflects the activity and growth of the Bank's lending activities. The Group includes transfers from the mortgage credit institution, growth in the parent bank excl. volume of the mortgage credit institution. Definition: Lending growth is calculated from the corresponding period last year to this year. The Group includes the volume of the mortgage credit institution, while the parent bank is excl. volume of the mortgage credit institution.
- 7.) **Deposit growth, last 12 months.** Reason for use: Growth in deposits over the last 12 months is a commonly used key figure in the banking/finance sector. The key figure reflects the activity and growth of the Bank's deposit operations. Definition: Deposit growth over the last 12 months reflects the growth in deposits on the balance sheet from the corresponding period last year to the current year.
- 8.) **Total assets..** Reason for use: The key figure reflects the Bank's total assets. Definition: Total assets on the balance sheet.
- 9.) **Growth in total assets, last 12 months.** Reason for use: The key figure reflects the growth in the Bank's total assets, including transfers to the Group's credit institutions and excluding volumes transferred to the Parent Bank's credit institutions. Definition: Growth in assets on the balance sheet are calculated from the corresponding period last year to the present year.
- 10.) **Average total assets.** Reason for use: Several key figures are calculated using average total assets. Definition: Weighted average of total assets throughout the year.

- 11.) **Equity excluding hybrid capital.** Reason for use: This key figure reflects a portion of the Bank's capital which belongs to the owners, excluding hybrid capital (subordinated bonds). Definition: The difference between the Bank's equity (retained earnings and paid-in equity) and the Bank's hybrid capital (subordinated bonds).
- 12.) **Loss ratio, loans.** Reason for use: This key figure reflects a loss recognised as a function of gross lending as at the balance sheet date. Definition: Loss provisions for loans and guarantees for the period divided by gross lending as a percentage. In the case of information concerning the loss ratio concerning loans for periods of less than a full financial year, the loss expense recognised in the income statement is annualised.
- 13.) **Defaulted commitments.** Reason for use: This key figure indicates how many defaulted commitments more than 90 days past due the Bank has at any given time.
- 14.) **Doubtful commitments.** Reason for use: This key figure indicates how many doubtful commitments not in default the Bank has at any given time.
- 15.) **Net defaulted and doubtful commitments as a percentage of gross lending.** Reason for use: This key figure indicates the Bank's net defaulted and doubtful commitments amount expressed as a proportion of gross lending. Definition: Net defaulted and doubtful commitments are gross non-performing and doubtful commitments, less impairments on these loans, divided by gross lending.
- 16.) **Earnings per equity certificate.** Reason for use: This key figure provides information on earnings per equity certificate. Definition: The equity certificate holders' share of earnings is calculated as the net income before other income statement items relative to the average number of equity certificates during the period.
- 17.) **Book equity per equity certificate.** Reason for use: This key figure provides information on the value of the book equity per equity certificate. Definition: Equity certificate holders' share of equity divided by the number of equity certificates.
- 18.) **Equity certificate ratio. Reason for use: Basis for calculating dividends.** Definition: Equity certificate holders' share of equity, e.g. subordinated bonds
- 19.) **P/E.** Reason for use: This key figure provides information on earnings per equity certificate. Definition: Share price at end of period divided by profit (annualised) per equity certificate.
- 20.) **P/B.** Reason for use: The key figure provides information on price per equity certificate. Definition: Share price at end of period divided by book equity per equity certificate.
- 21.) **Capital adequacy.** Reason for use: Statutory requirement regarding capital adequacy. Includes cooperating group. Definition: Subordinated capital divided by weighted balance and off balance sheet items.
- 22.) **Leverage ratio.** Reason for use: Commonly used key figure in the banking/finance sector. Gives a more comparable figure for capital, regardless of the method used to calculate capital adequacy. Definition: Tier 1 capital divided by capitalised items and non-capitalised items calculated without risk weighting.
- 23.) **Operating costs, adjusted for non-recurring effects.** Reason for use: Provides information on operating costs less costs which are not linked to normal operations and are essentially related to non-recurring events. Definition: Operating costs minus non-recurring effects.

Til forstanderskapet i SpareBank 1 Helgeland

## Uavhengig revisors beretning

### Uttalelse om årsregnskapet

#### Konklusjon

Vi har revidert årsregnskapet for SpareBank 1 Helgeland, som består av:

- selskapsregnskapet, som består av balanse per 31. desember 2024, resultatregnskap, oppstilling over endring i egenkapital og kontantstrøm for regnskapsåret avsluttet per denne datoen og noter til årsregnskapet, herunder vesentlige opplysninger om regnskapsprinsipper, og
- konsernregnskapet, som består av balanse per 31. desember 2024, resultatregnskap, oppstilling over endring i egenkapital og kontantstrøm for regnskapsåret avsluttet per denne datoen og noter til årsregnskapet, herunder vesentlige opplysninger om regnskapsprinsipper.

Etter vår mening

- oppfyller årsregnskapet gjeldende lovkrav,
- gir selskapsregnskapet et rettviseende bilde av selskapets finansielle stilling per 31. desember 2024 og av dets resultater og kontantstrømmer for regnskapsåret avsluttet per denne datoen i samsvar med IFRS Accounting Standards som godkjent av EU, og
- gir konsernregnskapet et rettviseende bilde av konsernets finansielle stilling per 31. desember 2024 og av dets resultater og kontantstrømmer for regnskapsåret avsluttet per denne datoen i samsvar med IFRS Accounting Standards som godkjent av EU.

Vår konklusjon er konsistent med vår tilleggsrapport til revisjonsutvalget.

#### Grunnlag for konklusjonen

Vi har gjennomført revisjonen i samsvar med International Standards on Auditing (ISA-ene). Våre oppgaver og plikter i henhold til disse standardene er beskrevet nedenfor under *Revisors oppgaver og plikter ved revisjonen av årsregnskapet*. Vi er uavhengige av selskapet og konsernet i samsvar med kravene i relevante lover og forskrifter i Norge og International Code of Ethics for Professional Accountants (inkludert internasjonale uavhengighetsstandarter) utstedt av International Ethics Standards Board for Accountants (IESBA-reglene), og vi har overholdt våre øvrige etiske forpliktelser i samsvar med disse kravene. Innhentet revisjonsbevis er etter vår vurdering tilstrekkelig og hensiktsmessig som grunnlag for vår konklusjon.

Vi er ikke kjent med at vi har levert tjenester som er i strid med forbudet i revisjonsforordningen (EU) No 537/2014 artikkel 5 nr. 1.

Vi har vært revisor for SpareBank 1 Helgeland sammenhengende i 21 år fra valget på forstanderskapet den 21. juli 2004 for regnskapsåret 2004.

#### Sentrale forhold ved revisjonen

Sentrale forhold ved revisjonen er de forhold vi mener var av størst betydning ved revisjonen av årsregnskapet for 2024. Disse forholdene ble håndtert ved revisjonens utførelse og da vi dannet oss vår mening om årsregnskapet som helhet, og vi konkluderer ikke særskilt på disse forholdene.

Verdien av utlån til kunder har samme karakteristika og risikoer i år som i fjor, og har følgelig vært et viktig fokusområde i vår revisjon også i 2024.



## Sentrale forhold ved revisjonen

## Hvordan vi i vår revisjon håndterte sentrale forhold ved revisjonen

### Verdien av utlån til kunder

Utlån utgjør en betydelig andel av verdien av eiendelene i balansen. Vurdering av nedskrivninger er basert på et modellbasert rammeverk med elementer som krever at ledelsen bruker skjønn. Rammeverket er komplekst og omfatter store mengder data og skjønnsmessige parametere.

Vi fokuserte på verdsettelsen av utlån til kunder fordi at ledelsens bruk av skjønn i forbindelse med nedskrivningsvurderinger kan ha en vesentlig virkning både på balanseført verdi av utlån og på resultatet i perioden. I tillegg er det en iboende risiko for feil på grunn av kompleksiteten og mengden data som benyttes i modellen.

I henhold til IFRS 9 skal nedskrivningene på utlån bygge på mer fremoverskuende vurderinger, slik at nedskrivninger reflekterer forventede tap.

Bruk av modeller for å beregne forventet kredittap omfatter bruk av skjønn. Vi har særlig fokusert på:

- klassifisering av porteføljene etter risiko og type segment,
- identifisering av lån hvor det har vært en vesentlig økning i kredittisiko,
- hvordan lånene blir kategorisert i ulike trinn,
- ulike parametere som tapsgrad, nedbetalingsfaktorer og scenarioer.

Bankens utlån er i hovedsak til personkunder og SMB segmentet, og modellene som er utviklet skal estimere tapsavsetninger til hver av disse segmentene.

I tillegg foretas individuelle avsetninger for utlån hvor det foreligger objektive indikasjoner på verdifall. Disse vurderingene krever også at ledelsen bruker skjønn.

Note 2.1, 2.1.1, 2.1.3, 16, 21.3 og 21.4 til regnskapet er relevante for beskrivelsen av tapsmodellen og for hvordan tapsavsetninger estimeres etter IFRS 9.

Ved vår revisjon av forventede tapsavsetninger vurderte og testet vi utformingen og effektiviteten av kontroller for kvalitetssikring av anvendte forutsetninger og beregningsmetoder. Videre testet vi detaljer både i avsetningene beregnet ved bruk av modellen, og i avsetningene som er beregnet individuelt.

Vi opparbeidet oss en detaljert forståelse av prosessen og testet relevante kontroller rettet mot å sikre:

- kalkulasjoner og metode som ble benyttet,
- om modellen som ble benyttet, var i henhold til rammeverket og om modellen virket som den skulle,
- påliteligheten og nøyaktigheten av data som blir benyttet i modellen.

Vår testing av kontrollene ga ingen indikasjoner på vesentlige feil i modellen eller avvik fra IFRS 9.

Vårt arbeid omfattet tester rettet mot selskapets finansielle rapporteringssystemer relevant for finansiell rapportering. Selskapet benytter eksterne serviceleverandører for å drifte enkelte sentrale kjerne IT-systemer. Revisor hos de relevante service-organisasjonene er benyttet til å evaluere design og effektivitet av- og teste etablerte kontroller som skal sikre integriteten av IT-systemene som er relevante for finansiell rapportering. Revisor har i den forbindelse avgitt rapporter som blant annet omfattet testing av om sentrale beregninger foretatt av kjernesystemene ble utført i tråd med forventningene, herunder rente- beregninger og amortiseringer. Testingen omfattet dessuten integriteten av data, endringer av og tilgang til systemene.

For å kunne legge informasjonen i revisors rapporter til grunn for våre vurderinger, forsikret vi oss om revisorens kompetanse og objektivitet. I tillegg gjennomgikk vi tilsendte rapporter og vurderte mulige avvik og tiltak. Vi testet også selv tilgangskontroller til IT-systemer og arbeidsdeling der det var nødvendig av hensyn til våre egne konkrete revisjonshandlinger.

Våre vurderinger og tester underbygget at vi kunne legge til grunn at dataene som ble håndtert i- og beregningene som ble foretatt av selskapets

eksterne kjernesystem var pålitelige. Dette var et nødvendig grunnlag for vår revisjon.

Virkningen av usikkerheten i markedet, herunder påvirkningen på modellavsetninger, ble diskutert med ledelsen. Diskusjonene omfattet eventuelle virkninger av makroforhold og hvordan ledelsen håndterer klimarisiko i utlånsporteføljen. For utlån hvor det forelå objektive indikasjoner på verdifall og hvor nedskrivningsbeløpet var individuelt beregnet testet vi et utvalg. Realisasjonsverdien blir beregnet ved bruk av eksterne takster eller interne vurderinger. For å ta stilling til realisasjonsverdien, gjennomgikk vi takstene og vurderte relevansen og rimeligheten av viktige forutsetninger benyttet i takstene og metoden benyttet i beregningen. For vurderinger som var gjort internt uten at det ble benyttet takster, intervjuet vi kredittmedarbeidere og ledelsen og utfordret relevansen og rimeligheten av viktige forutsetninger og metoden som var benyttet i beregningen av nedskrivningsbeløpet. Videre testet vi om utlån med individuelle tapsavsetninger var riktig klassifisert i modellen og vurderte rimeligheten av de totale tapsavsetningene. Avvik som ble funnet i vår testing var uten vesentlig betydning. Vi leste notene og fant at informasjonen knyttet til tapsmodell, ulike parametere og skjønnsmessige vurderinger var tilstrekkelige og dekkende.

### Øvrig informasjon

Styret og daglig leder (ledelsen) er ansvarlige for informasjonen i årsberetningen og annen øvrig informasjon som er publisert sammen med årsregnskapet. Øvrig informasjon omfatter informasjon i årsrapporten bortsett fra årsregnskapet og den tilhørende revisjonsberetningen. Vår konklusjon om årsregnskapet ovenfor dekker verken informasjonen i årsberetningen eller annen øvrig informasjon.

I forbindelse med revisjonen av årsregnskapet er det vår oppgave å lese årsberetningen og annen øvrig informasjon. Formålet er å vurdere hvorvidt det foreligger vesentlig inkonsistens mellom årsberetningen, annen øvrig informasjon og årsregnskapet og den kunnskap vi har opparbeidet oss under revisjonen av årsregnskapet, eller hvorvidt informasjon i årsberetningen og annen øvrig informasjon ellers fremstår som vesentlig feil. Vi har plikt til å rapportere dersom årsberetningen eller annen øvrig informasjon fremstår som vesentlig feil. Vi har ingenting å rapportere i så henseende.

Basert på kunnskapen vi har opparbeidet oss i revisjonen, mener vi at årsberetningen

- er konsistent med årsregnskapet og
- inneholder de opplysninger som skal gis i henhold til gjeldende lovkrav.

Vår uttalelse om årsberetningen gjelder tilsvarende for redegjørelsen om foretaksstyring.

### Ledelsens ansvar for årsregnskapet

Ledelsen er ansvarlig for å utarbeide årsregnskapet og for at det gir et rettviseende bilde i samsvar med IFRS Accounting Standards som godkjent av EU. Ledelsen er også ansvarlig for slik intern kontroll som den

finner nødvendig for å kunne utarbeide et årsregnskap som ikke inneholder vesentlig feilinformasjon, verken som følge av misligheter eller utilsiktede feil.

Ved utarbeidelsen av årsregnskapet er ledelsen ansvarlig for å ta standpunkt til selskapets og konsernets evne til fortsatt drift og opplyse om forhold av betydning for fortsatt drift. Forutsetningen om fortsatt drift skal legges til grunn for årsregnskapet med mindre ledelsen enten har til hensikt å avvike konsernet eller å legge ned virksomheten, eller ikke har noe realistisk alternativ til dette.

### **Revisors oppgaver og plikter ved revisjonen av årsregnskapet**

Vårt mål er å oppnå betryggende sikkerhet for at årsregnskapet som helhet ikke inneholder vesentlig feilinformasjon, verken som følge av misligheter eller utilsiktede feil, og å avgi en revisjonsberetning som inneholder vår konklusjon. Betryggende sikkerhet er en høy grad av sikkerhet, men ingen garanti for at en revisjon utført i samsvar med ISA-ene, alltid vil avdekke vesentlig feilinformasjon. Feilinformasjon kan oppstå som følge av misligheter eller utilsiktede feil. Feilinformasjon er å anse som vesentlig dersom den enkeltvis eller samlet med rimelighet kan forventes å påvirke de økonomiske beslutningene som brukerne foretar på grunnlag av årsregnskapet.

Som del av en revisjon i samsvar med ISA-ene, utøver vi profesjonelt skjønn og utviser profesjonell skepsis gjennom hele revisjonen. I tillegg:

- identifiserer og vurderer vi risikoen for vesentlig feilinformasjon i regnskapet, enten det skyldes misligheter eller utilsiktede feil. Vi utformer og gjennomfører revisjonshandlinger for å håndtere slike risikoen, og innhenter revisjonsbevis som er tilstrekkelig og hensiktsmessig som grunnlag for vår konklusjon. Risikoen for at vesentlig feilinformasjon som følge av misligheter ikke blir avdekket, er høyere enn for feilinformasjon som skyldes utilsiktede feil, siden misligheter kan innebære samarbeid, forfalskning, bevisste utelatelser, uriktige fremstillinger eller overstyring av internkontroll.
- opparbeider vi oss en forståelse av intern kontroll som er relevant for revisjonen, for å utforme revisjonshandlinger som er hensiktsmessige etter omstendighetene, men ikke for å gi uttrykk for en mening om effektiviteten av selskapets og konsernets interne kontroll.
- evaluerer vi om de anvendte regnskapsprinsippene er hensiktsmessige og om regnskapsestimatene og tilhørende noteopplysninger utarbeidet av ledelsen er rimelige.
- konkluderer vi på om ledelsens bruk av fortsatt drift-forutsetningen er hensiktsmessig, og, basert på innhentede revisjonsbevis, hvorvidt det foreligger vesentlig usikkerhet knyttet til hendelser eller forhold som kan skape tvil av betydning om selskapets og konsernets evne til fortsatt drift. Dersom vi konkluderer med at det eksisterer vesentlig usikkerhet, kreves det at vi i revisjonsberetningen henleder oppmerksomheten på tilleggsopplysningene i årsregnskapet, eller, dersom slike tilleggsopplysninger ikke er tilstrekkelige, at vi modifiserer vår konklusjon. Våre konklusjoner er basert på revisjonsbevis innhentet frem til datoen for revisjonsberetningen. Etterfølgende hendelser eller forhold kan imidlertid medføre at selskapet og konsernet ikke kan fortsette driften.
- evaluerer vi den samlede presentasjonen, strukturen og innholdet i årsregnskapet, inkludert tilleggsopplysningene, og hvorvidt årsregnskapet gir uttrykk for de underliggende transaksjonene og hendelsene på en måte som gir et rettviseende bilde.
- innhenter vi tilstrekkelig og hensiktsmessig revisjonsbevis vedrørende den finansielle informasjonen til enhetene eller forretningsområdene i konsernet for å kunne gi uttrykk for en mening om konsernregnskapet. Vi er ansvarlige for å lede, følge opp og gjennomføre konsernrevisjonen. Vi har eneansvar for vår konklusjon om konsernregnskapet.

Vi kommuniserer med styret blant annet om det planlagte innholdet i og tidspunkt for revisjonsarbeidet og eventuelle vesentlige funn i revisjonen, herunder vesentlige svakheter i intern kontroll som vi avdekker gjennom revisjonen.

Vi avgir en uttalelse til revisjonsutvalget om at vi har etterlevd relevante etiske krav til uavhengighet, og kommuniserer med dem alle relasjoner og andre forhold som med rimelighet kan tenkes å kunne påvirke vår uavhengighet, og, der det er relevant, om iverksatte tiltak for å eliminere trusler eller iverksatte forholdsregler.

Av de forholdene vi har kommunisert med styret, tar vi standpunkt til hvilke som var av størst betydning for revisjonen av årsregnskapet for den aktuelle perioden, og som derfor er sentrale forhold ved revisjonen. Vi beskriver disse forholdene i revisjonsberetningen med mindre lov eller forskrift hindrer offentliggjøring av forholdet, eller dersom vi, i ekstremt sjeldne tilfeller, beslutter at forholdet ikke skal omtales i revisjonsberetningen siden de negative konsekvensene ved å gjøre dette med rimelighet må forventes å oppveie allmennhetens interesse av at forholdet blir omtalt.

## Uttalelse om andre lovmessige krav

### Uttalelse om etterlevelse av krav om felles elektronisk rapporteringsformat (ESEF)

#### Konklusjon

Som en del av revisjonen av årsregnskapet for SpareBank 1 Helgeland har vi utført et attestasjonsoppdrag for å oppnå betryggende sikkerhet for at årsregnskapet som inngår i årsrapporten med filnavn SpareBank1Helgeland-2024-12-31-no.zip i det alt vesentlige er utarbeidet i overensstemmelse med kravene i delegert kommisjonsforordning (EU) 2019/815 om et felles elektronisk rapporteringsformat (ESEF-regelverket) etter forskrift gitt med hjemmel i verdipapirhandelloven § 5-5, som inneholder krav til utarbeidelse av årsrapporten i XHTML-format og iXBRL-markering av konsernregnskapet.

Etter vår mening er årsregnskapet som inngår i årsrapporten i det alt vesentlige utarbeidet i overensstemmelse med kravene i ESEF-regelverket.

#### Ledelsens ansvar

Ledelsen er ansvarlig for å utarbeide årsrapporten i overensstemmelse med ESEF-regelverket. Ansvaret omfatter en hensiktsmessig prosess, og slik intern kontroll ledelsen finner nødvendig.

#### Revisors oppgaver og plikter

For beskrivelse av revisors oppgaver og plikter ved attestasjonen av ESEF-rapporteringen, vises det til: <https://revisorforeningen.no/revisjonsberetninger>

Mo i Rana, 27. februar 2025  
**PricewaterhouseCoopers AS**

Silja Eriksen  
Statsautorisert revisor  
(elektronisk signert)

