



## COMPLIANCE INFORMATION

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Anti Money Laundering (AML), Anti Terrorism Financing (ATF) and Know Your Customer (KYC) policies are implemented through Norwegian law and national banking regulations.

SpareBank 1 Nord-Norge's policy of secrecy does not allow publishing of detailed information on complete internal routines, or to give detailed information regarding internal handling of specific issues. However, internal routines make SpareBank 1 Nord-Norge, all of its branches, sub-branches and majority owned subsidiaries compliant with national and international regulations regarding Anti Money Laundering (AML), Anti Terrorism Financing (ATF) and Know Your Customer policies (KYC). Internal audit procedures are set up in order to ensure that SpareBank 1 Nord-Norge has established adequate routines based on Norwegian legislation and that such routines are complied with.

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**Legal Name:** SpareBank 1 Nord-Norge

**Organisation No.:** 952 706 365

**Resident Country:** Norway

**Head Office registered address:** Storgata 65  
9008 Tromsø  
Norway

**Head Office mailing address:** SpareBank 1 Nord-Norge  
P.O. Box 6800  
N-9298 TROMSØE

**Website:** [www.snn.no](http://www.snn.no)

**Stock Exchange listing:** Listed on the Oslo Stock Exchange  
Ticker: NONG

**Ownership:** Savings banks are self owned entities. However, they are entitled to raise capital in the equity market by issuing Equity Certificates (ECs). SpareBank 1 Nord-Norge is a savings bank with Equity Certificates listed on the Oslo Stock exchange. ECs are very similar to shares. The main differences between ECs and shares are that ECs give ownership rights to specific parts of a bank's capital. In addition will the governing bodies of a savings bank have representation from other parties (public sector, employees and depositors) in addition to the EC-holders.

<b>Board of Directors:</b>	Chairman	Kjell Olav Pettersen
	Deputy Chairman	Pål Andreas Pedersen
	Members	Hans-Tore Bjerkaas
		Sonja Djønne
		Anita Persen
		Ann-Christine Nybacka
		Greger Mannsverk
		Vivi Ann Pedersen

<b>The Corporate Management:</b>	<p>Jan-Frode Janson - CEO  Liv Bortne Ulriksen – Business Development  Geir Andreassen – Risk Management and Compliance  Rolf Eigil Bygdnes – CFO  Stig-Arne Engen – Communications Director  Elisabeth Utheim – Manager support functions  Petter Høiseth – Subsidiaries and holdings</p>
<b>Main Business Areas:</b>	<p>The Bank is authorised to conduct all normal banking business and to provide all normal banking services in accordance with the rules and regulations contained in the Savings Banks' Act.</p>
<b>Financial Statement:</b>	<p>Accessible on our web site <a href="http://www.snn.no/IR">www.snn.no/IR</a></p>
<b>Banking Licence:</b>	<p>Original Banking Licence is from 1836 and therefore not possible to publish in English and through this media.  However, a Letter of Compliance is available at <a href="http://www.snn.no/IR">www.snn.no/IR</a></p>
<b>Supervisory Authority:</b>	<p>Banking in Norway is regulated by law, with regular supervision from Finanstilsynet / The Financial Supervisory Authority of Norway - <a href="http://www.finanstilsynet.no">http://www.finanstilsynet.no</a></p>
<b>National AML Authority:</b>	<p>The central police unit, Økokrim / The Norwegian National Authority for Investigation and Prosecution of Economic and Environmental Crime - <a href="http://www.okokrim.no">http://www.okokrim.no</a></p>
<b>Bearer Share Companies:</b>	<p>Banking services are not provided to Bearer Share Companies.</p>
<b>Shell Banks:</b>	<p>Banking services are provided only to banks/financial institutions having a physical presence in a country - no business is conducted with Shell Banks.</p>
<b>Know Your Customer (KYC):</b>	<p>KYC is one of SpareBank 1 Nord-Norge's fundamental principles. The bank's overall ambition is to continuously keep a serious approach to the authorities' demand for compliance.</p> <p>Written policies ensure that reasonable measures are taken to obtain information about the true identity of customers so as to ensure legitimate activities.</p> <p>New customers must comply with SpareBank 1 Nord-Norge's identification policy prior to be provided accounts.</p> <p>Anonymous accounts, nameless number accounts or bearer accounts are prohibited - accounts are kept only in the name of an account holder.</p> <p>The customer database is regularly evaluated in order to maintain a high level of quality on the information about our customers. Records on customer identification are maintained for a specified period of time in order to permit investigation of suspicious activities as well as provide, if necessary, evidence for the prosecution of criminal behaviour.</p> <p>Domestic payment services are provided only to identified customers. International payment services are provided only to identified and registered customers.</p>

**Anti Money Laundering (AML)  
Anti Terrorism Financing (ATF):**

Norwegian legislation on Anti Money Laundering and Anti Terrorism Financing is contained in Act No 41 of 20<sup>th</sup> June 2003 - The Money Laundering Act. The Money Laundering Act implements the EU's second Money Laundering Directive adopted on 4. December 2001 (2001/97/EC) amending the first Money Laundering Directive (91/308/EEC) on prevention of the use of the financial system for the purpose of Money Laundering.  
Norway is a member of FATF / Financial Action Task Force since 1991 and national legislation has implemented FATF recommendations.

SpareBank 1 Nord-Norge's Head Office, branches, sub-branches and majority owned subsidiaries are compliant to the Money Laundering Act. Written policies and procedures have been established for the purpose of prevention and identification of money laundering and financing of terrorism, as well as investigation and reporting of suspicious transactions to Økokrim / The Norwegian National Authority for Investigation and Prosecution of Economic and Environmental Crime for further investigation and enforcement.

SpareBank 1 Nord-Norge keeps a high level of alertness; implementation of Anti Money Laundering, Anti Terrorism Financing and Know Your Customer policies are monitored on a permanent basis. An electronic monitoring system, being a mandatory requirement in Norway from 2005, is implemented.

Regular training programs are mandatory to all employees; programs with the objective of making them best possible prepared to detect, deal with and respond to transactions and activity that may be of a suspicious nature.

**Money Laundering Officer:**

Frode Pedersen – Department Manager

Telephone: (+47) 913 05589 (Direct)  
(+47) 915 02244 (Switchboard)

E-mail: [frode.pedersen@snn.no](mailto:frode.pedersen@snn.no)

**Compliance Officer:**

Geir Andreassen – Risk Manager

Telephone: (+47) 776 22407 (Direct)  
(+47) 915 02244 (Switchboard)

Fax: (+47) 776 22571

E-mail: [geir.andreassen@snn.no](mailto:geir.andreassen@snn.no)

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Geir Andreassen  
Risk Manager - Compliance Officer