Annual Report 2024

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From the CEO

My first year as CEO has been marked by significant contrasts. The wars in the Middle East and Ukraine, along with hybrid warfare right on our doorstep, have dominated the news. The fight against inflation has continued, and the interest rate cuts that were announced for 2024 were fewer than expected, and in Norway, they did not materialize at all. Climate crises and extreme weather have occurred more frequently, more intensely, and much closer to us than we had anticipated. The sum of all this is further instability and unrest.

Amidst all this, everyday life in Northern Norway is surprisingly normal. The region can almost appear somewhat invulnerable, and so far, not many have directly felt the consequences of a turbulent world. We can primarily thank two factors for this: we export goods that the world needs, and the Norwegian krone is exceptionally weak. This actual sign of illness is currently working in our favour.

The clearest symptom is the enormous influx of tourists we have seen throughout 2024. By the end of the year, Tromsø had 29 direct flight routes abroad. This is more than any other Norwegian city, except for Oslo. 2024 was also the year when almost the entire region experienced an influx of tourists, although it is still Lofoten and the area around Tromsø that feel it the most. The low exchange rate of the Norwegian krone makes it affordable for travellers to visit the region, but tourists primarily come because Northern Norway has so much to offer. In this regard, it is fitting to highlight the new term Coolcation. Here, we are back to benefiting from others' disadvantages: as climate change makes the planet warmer, people come north – to cool down.

With the growth in tourism and seafood exports once again setting a record at BNOK 175.4, the business sector in the north is thriving. There is practically no unemployment, and the number of bankruptcies remains low. Few bankruptcies are the key to economic success. One might ponder the weak exchange rate of the Norwegian krone. What will be the consequence if the krone strengthens? We know that costs in businesses often increase during good times and are difficult to reduce when downturns come. For now, however, there is little indication of a strengthening Norwegian krone, and the hope is that the business sector in the north can continue to benefit from the weak currency while using the good times to prepare for the bad. For they will come. We just don't know when.

In SpareBank 1 Nord-Norge, 2024 has brought several noteworthy achievements. It is, of course, impossible not to start by highlighting the financial results. MNOK 4,512 before tax and a return on equity of 21.8% are impressive. We can thank our skilled employees for this, but also a macroeconomy that has swung in our favour.

In the first quarter, the Executive Vice President for Innovation and Business Development, Bjørn Tore Markussen, left his position to return to work in the Armed Forces. He was replaced by Birgitte Nygård Vibe, who came from Google in Ireland, bringing with her both fresh and different expertise. Bringing in new impulses, even for positions in the executive management team, is important. The world is changing rapidly, and so are customer expectations. Throughout the year, we have focused on customer centricity and the application of artificial intelligence. Being able to draw inspiration and expertise from a world-leading company like Google is superb.

And precisely because customer expectations are constantly changing, and we must work hard and purposefully to keep up, a major organisational change was planned in the second half of 2024. The changes resulted in us going from 7 to 6 units from 1 January 2025, and thus also from 7 to 6 directors in the executive management team. Both Lasse Hagerupsen and Turid Aspenes were thanked for their service, and we have not yet appointed a new director for the personal market, where Bjørn Bardal is currently acting. The ambitions with the organisational changes are to increase execution power by refining and strengthening our units within three main areas: Business and Risk Management, Customer and Business Value, and Business Development, Efficiency and Support.

Another measure taken in this regard was to bring the subsidiaries closer to the parent bank, and through a clearer ownership governance policy, we aim to do the same for product companies and SpareBank 1 Utvikling. Standardisation will provide new strength and lower costs.

In the autumn of 2024, a simplification project with a primary focus on cost control was initiated. The project, called GENI (Make it Simple and Intelligent), has a simple ambition: to replace only 80 percent of those who leave due to turnover. The project also aims to cut unnecessary tasks and enable our employees to manage entirely new tasks by providing them with fresh skills. This will make our processes more agile, more customer-oriented, and will save us costs. The project is planned to last until 2027, and the response from the market has been positive so far. The project will be conducted in accordance with our values: genuine, close, and simple. These values are new as of 2024 and were established in close collaboration with all our employees.

The year we leave behind has been strongly marked by consolidation in the banking market, particularly among savings banks. It wasn't many decades ago that there were over 600 savings banks in the country. Now the number is 80. Among the mergers that took place in 2024, it was particularly the one between Sparebanken Vest and Sparebanken Sør that resonated. Not because it was especially unexpected, or that the new bank became particularly large. But because the new Sparebanken Norge has signalled an ambition to be a national bank. In doing so, it somewhat deviates from the typical 'savings bank' concept – being a local bank for a defined geographical area.

Also, within our own Sparebank 1 alliance, we have seen mergers over the past year. SpareBank 1 SR-Bank and SpareBank 1 Sørøst-Norge have merged to become SpareBank 1 Sør-Norge, while SpareBank 1 Østlandet has merged with Toten Sparebank. This somewhat disrupts the internal balance and power dynamics, but the alliance should handle it well.

But it is not only consolidation that has characterised the savings bank sector in 2024. In November, the government-appointed Savings Bank Committee presented its report. The report came as a result of some pressure from the EBA (European Banking Authority), and there was great anticipation regarding the committee's stance on the position of equity certificates, and the fact that equity certificates as an instrument differ from

ordinary shares, something the EBA has seemed critical of. Nevertheless, the committee's recommendation was that equity certificates should remain, but that the primary capital should be equated with the owner's capital in case of losses.

A bit more surprising was the committee's clear recommendation that the right to pay out customer dividends from the community dividend should cease. This arrangement has existed since 2009, and it also provides tax deductions on what is paid out as customer dividends, which directly affects the results of customer dividend banks positively. This stance has led to some discord among the savings banks. Today, there are nine banks that pay out customer dividends, and these are, of course, in favour of continuing the practice. However, several of the banks that have not yet used this opportunity have also expressed support for customer dividends. The Savings Bank Committee's report is scheduled for political consideration in the spring of 2025, and the outcome will not be clear until after that.

As 2024 drew to a close, it became clear that the USA would have a new president from 2025. Although Northern Norway is far from the USA, it is expected that Trump II will have an impact on the entire world, including economically. For us, far north in peaceful Norway, potential trade barriers mean slightly more challenging times. We export, among other things, fish and seafood to the USA. It is too early to say what the outcome will be. For now, Northern Norway is doing well. And when the region is doing well, the bank often does well too. We approach 2025 with optimism, and our vision remains steadfast; For Northern Norway!

Hanne Karoline Kræmer
konsernsjef

Business strategy

We shall, better than anyone, understand and achieve what is important for people and businesses in Northern Norway.

Central to the overall management in SpareBank 1 Nord-Norge (SNN) is the Group's strategic compass. It describes our values, financial and strategic goals, overarching principles, and vision. The strategic compass enables us to make good decisions, even in times when the environment and market conditions are changing rapidly.

Vision and values

At the top, the compass points to the Group's vision: For Northern Norway. It indicates both what we are and for whom we exist.

The innermost circle shows the Group's values, which is the foundation for everything we do, and which guides our attitudes and actions:

Genuine: We are honest and transparent in everything we do. We do not sweep things under the rug but say it as it is. This applies both to feedback and to why we do what we do. Authenticity creates trust and builds strong relationships with our customers and colleagues.

Close: We are close to our employees, customers, and local communities. We understand their needs and challenges, and we are always available to help. Our proximity gives us the opportunity to offer tailored solutions that truly make a difference.

Simple: We strive to make things as simple as possible for our customers and employees. We cut unnecessary costs and streamline processes to ensure that we deliver services quickly and efficiently. Simplicity is the key to achieving our goals without unnecessarily complicating things.

Financial Goals

The white circle contains the Group's financial goals: profitability, efficiency, financial strength, and dividends. The table below shows the levels we have delivered on in recent years.

	2020	2021	2022	2023	2024
Profitability (Return of equity)	12.6%	15.10%	11.9%	16.4%	**21.8%**
Effeciency (cost/income)	40.0%	40.6%	40.3%	36.0%	**30.2%**
Solidity (Tier 1 capital)	17.5%	18.7%	17.3%	17.1%	**16.8%**
Dividend per equity certificate	NOK 3.90	NOK 10.40	NOK 8.20	NOK 7.00	**NOK 8.75**

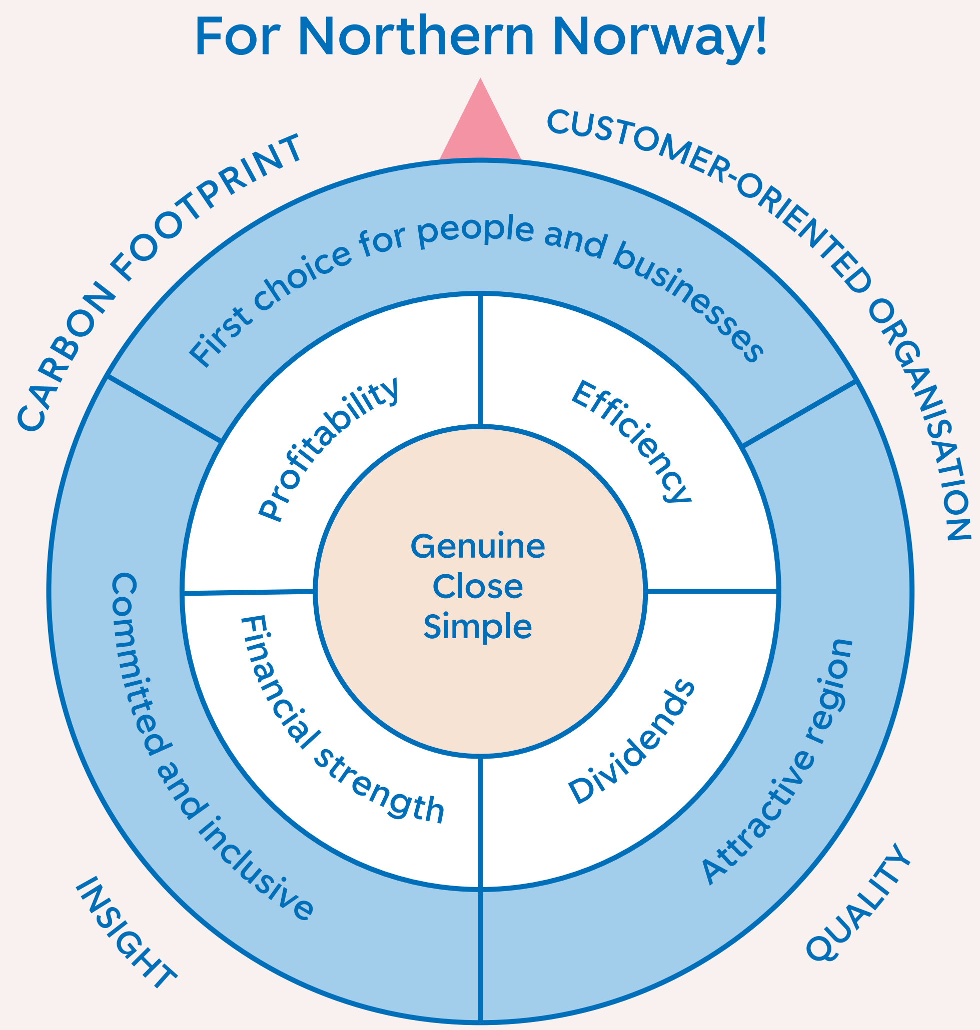
Strategic Goals

The business strategy is based on the principle of shared value creation. This means that SNN is not solely focused on creating value for ourselves and our owners. SNN is also committed to creating value for the customer and for the region we are a part of. Therefore, SNN has three equal strategic goals.

Creating value for customers: SNN shall be the first choice for individuals and businesses. This means that SNN is the preferred partner for financial services, both for private customers and corporate clients.

Creating value for SpareBank 1 Nord-Norge: SNN shall have engaged employees in an inclusive organization. This means that SNN's employees are engaged in our work and tasks because it provides a sense of accomplishment and energy. We feel included, seen, recognized, and that our efforts are important. We also facilitate good growth conditions for our diversity and thrive with the differences we have among us.

Creating value for Northern Norway: SNN shall contribute to making Northern Norway an attractive region. This means that across our operations, SNN does its part to make Northern Norway an even better place for both people and businesses. By contributing to creating value for Northern Norway, we help realize the enormous value creation potential in the north. And by contributing to creating value for Northern Norway, we ensure our own long-term existence.



Strategic Principles

Our strategic compass rests on our strategic principles, which shall permeate how SNN acts to fulfil our vision.

Customer-oriented: Our first principle is that SNN is customer-oriented. This means that SNN puts the customer first, and that we always understand the customer's challenges and needs and actively develop and prioritize solutions that meet expectations. Because it is by delivering what customers expect, at all times, that we create value for the group, for our employees, and for our owners.

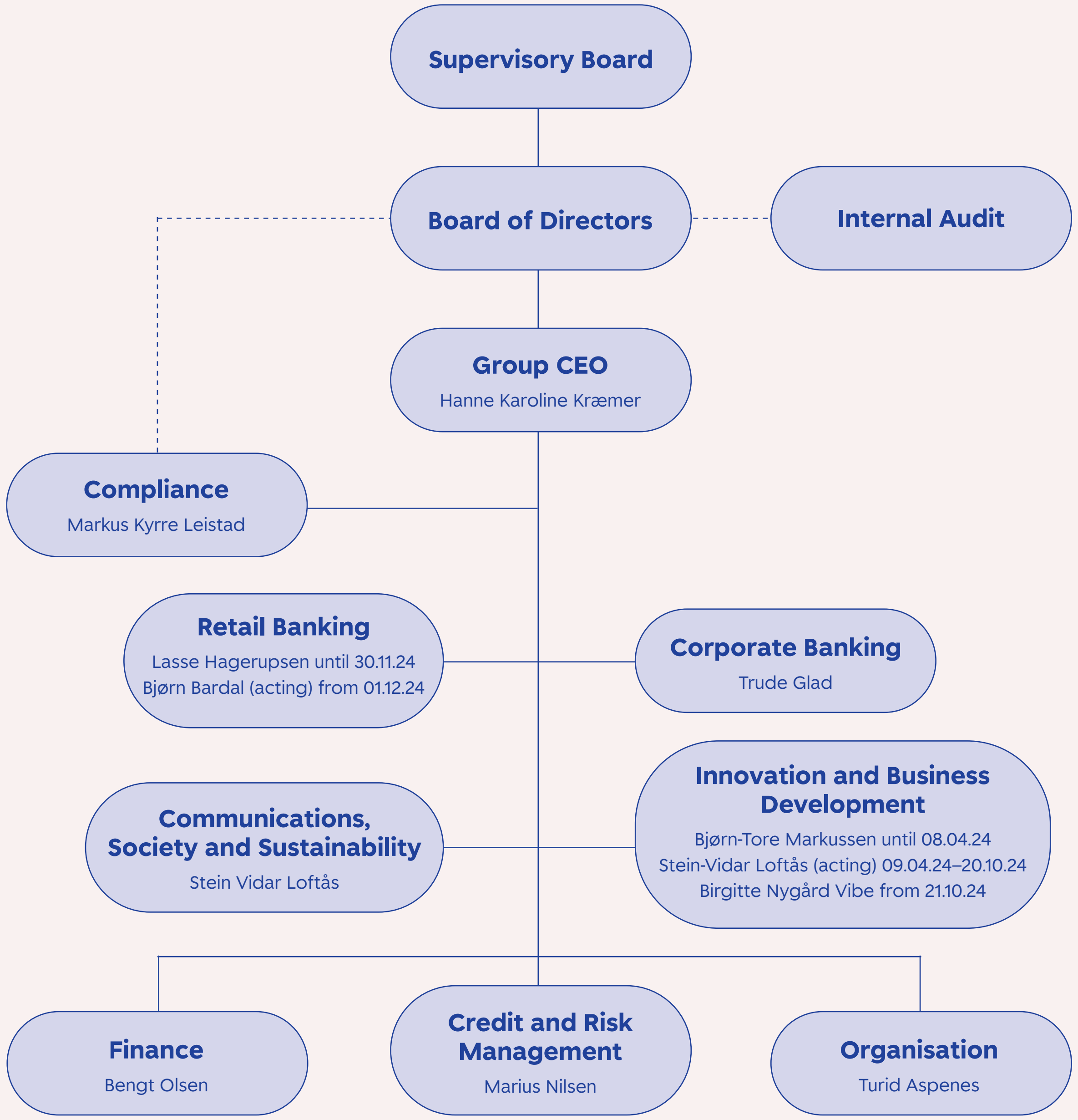
Quality: Our second principle is that SNN shall have quality in everything we do. We do the right things right and take pride in being a financial group that can be trusted. We have established good governing documents that everyone in the group adheres to.

Insight: Our third principle is that SNN shall be driven by insight. This means that we always base our decisions on insight and knowledge. We do not guess, we do not speculate, and we do not make decisions solely based on gut feeling. We know our customers, suppliers, own employees, and other stakeholders – and not least our region. We shall always apply this foundation correctly.

Climate footprint: Our fourth principle concerns the climate footprint. As the world's northernmost financial group, SNN must particularly consider issues related to Arctic areas. SpareBank 1 Nord-Norge has an adopted ambition to be a driving force for a sustainable future in the north. This ambition includes a commitment to reduce our own climate footprint while using our strong influence in society to motivate sustainable development. The group's materiality assessment defines which sustainability topics are strategically important for SpareBank 1 Nord-Norge. These should be included and considered in all our operations. This applies both to the way the business is run and the requirements we set for customers, suppliers, our own employees, and other stakeholders.

Organisation

Organisational chart (bank) as of Dec. 2024



Organisational changes in 2024

BANKING OPERATIONS

No major organisational changes during the year.

SPAREBANK 1 REGNSKAPSHUSET NORD-NORGE

No major organisational changes during the year.

SPAREBANK 1 FINANS NORD-NORGE

No major organisational changes during the year.

EIENDOMSMEGLER 1 NORD-NORGE

No major organisational changes during the year.

Samfunnsløftet in 2024

The community's ownership share in SpareBank 1 Nord-Norge is 53.6 percent, and the dividend from this is managed through Samfunnsløftet. The community dividend is to be used in a way that contributes to value creation and development in Northern Norway.

In 2024, Samfunnsløftet conducted an external evaluation which concluded that Samfunnsløftet's allocations have beneficial effects on the goals of value creation, development, and making Northern Norway an even better place to live. To further develop the initiative, one of the recommendations from the evaluation is that Samfunnsløftet develops an even broader knowledge base and better systematizes dialogue with stakeholders. The recommendations have already been incorporated into the work on a new strategy, which aims to be completed by 2025.

Key Figures Samfunnsløftet in 2024

Figures for 2023 and change from the preceding year in brackets.

1,504
projects received support
(1,408 / +6.8%)

366.7
MNOK in grants
(MNOK 428.3 / –14.4%)

2,478
applications were received
(2,283 / +8.5%)

965
MNOK was applied for in total
(MNOK 1,029 / –6.2%)

The community dividends from 2023 totalled MNOK 813, of which MNOK 276 was allocated to the various areas in Samfunnsløftet in 2024.

The foundation Sparebankstiftelsen SpareBank 1 Nord-Norge received the remaining MNOK 537. The foundation's mission is to take the savings bank tradition forward. Long-term saving in the foundation is intended to ensure that the regional community can retain its ownership position should the Bank require more funds from its owners at some point. Without this, the regional community's ownership could be diluted. The foundation is also the Bank's largest northern Norwegian owner, and its surplus also goes to worthy causes in the north. For further information about the foundation, visit snnstiftelsen.no.

Selected grants

The largest grant in 2024 went to the Altaparken/Álttáparka Arena project, which received MNOK 20. The project aims to establish a clubhouse, multi-purpose hall, and football stadium, with a total budget of MNO 204.78.

The TV fundraising campaign 2024, 'Together for Little Heroes,' received a record allocation of MNOK 5. The campaign supported the Children's Cancer Association's work to establish family houses close to university hospitals for seriously ill children and their families.

Samfunnsløftet's Talent Grant was awarded to young talents in the categories of sports, arts and culture, and sustainable driving force. Eleven top talents received 150,000 NOK each, while eighteen talents received a development scholarship of 50,000 NOK each, totalling MNOK 2.55.

The Artist Grant was awarded for the second time in 2024, and thirty professional artists in Northern Norway received 150,000 NOK each, totalling MNOK 4.5.
All allocations are published on the website samfunnsløftet.snn.no.

TALENT GRANT: This year's recipients gathered in Tromsø. *Photo: Håkon Steinmo*

Key figures

From income statement

AMOUNTS I NOK MILLION	NOTE	2024	2023	2022	2021	2020	2019	2018	2017	2016	2015
Net interest income	19	**4 028**	3 627	2 556	2 014	2 068	2 097	1 896	1 770	1 644	1 512
Commission income and other income	20	**1 541**	1 404	1 234	1 499	1 299	1 116	1 057	992	924	933
Net return on financial investments	21	**1 057**	183	274	794	693	911	463	552	509	249
Total income		**6 626**	5 214	4 064	4 307	4 060	4 124	3 416	3 314	3 077	2 694
Personnel costs	22	**1 102**	1 000	844	936	869	834	748	708	689	850
Other operating expenses	23	**901**	825	793	812	757	806	726	658	631	611
Total operating expenses		**2 003**	1 825	1 637	1 748	1 626	1 640	1 474	1 366	1 320	1 461
Result before losses		**4 623**	3 389	2 427	2 559	2 434	2 484	1 942	1 948	1 757	1 233
Loss on loans, guarantees etc.	13	**110**	116	63	–235	332	11	22	184	213	200
Result before tax		**4 513**	3 273	2 364	2 794	2 102	2 473	1 920	1 764	1 544	1 033
Tax charge	25	**849**	725	513	499	360	409	374	324	291	163
Result non-current assets held for sale							–2	–4			–5
Minority interests		**33**	27	27	12						–7
Net profit majority interests		**3 631**	2 521	1 824	2 283	1 742	2 062	1 542	1 440	1 253	872

From balance sheet

AMOUNTS I NOK MILLION	NOTE	2024	2023	2022	2021	2020	2019	2018	2017	2016	2015
Cash and loans to and claims on credit institutions	10	**3 798**	2 706	1 932	1 764	1 894	1 471	3 786	3 431	2 721	2 398
CDs, bonds and other interest-bearing securities	28,29	**26 743**	20 975	21 059	21 758	20 570	17 738	14 565	11 811	10 470	11 747
Loans and advances to customers	11	**101 828**	98 789	93 514	90 035	89 038	86 771	82 145	75 003	70 763	64 053
Individual write-downs for impaired value	13								–216	–154	–169
Collective write-downs for impaired value	13								–300	–373	–247
Provision for credit losses - stage 3	11,13	**–114**	–152	–205	–198	–354	–189	–192			
Provision for credit losses - stage 2	11,13	**–334**	–343	–275	–294	–302	–142	–157			
Provision for credit losses - stage 1	11,13	**–377**	–261	–184	–200	–167	–151	–162			
Other assets	34	**3 304**	6 425	6 478	6 315	6 619	6 026	6 171	7 457	7 074	7 621
Total assets		**134 848**	128 138	122 319	119 180	117 298	111 524	106 156	97 186	90 501	85 403
Deposits from credit institutions	10	**761**	1 164	1 185	1 092	1 272	563	187	434	818	1 816
Deposits from customers	35	**87 618**	82 495	79 484	76 149	73 158	68 030	63 985	57 849	53 870	48 087
Debt securities in issue	36	**13 756**	13 970	15 336	17 527	23 167	24 786	25 135	23 552	21 165	21 470
Other liabilities	37	**4 764**	4 952	4 673	3 199	3 629	2 923	2 591	2 202	2 287	2 719
Subordinated loan capital	38	**9 435**	8 367	5 718	4 560	1 050	1 050	1 200	850	1 350	1 350
Hybrid capital	42	**1 450**	1 250	600	780	780	780	780	530		
Total equity	41	**17 889**	15 940	15 323	15 873	14 242	13 392	12 278	11 769	11 011	9 961
Total liabilities and equity		**135 673**	128 138	122 319	119 180	117 298	111 524	106 156	97 186	90 501	85 403

Key figures

AMOUNTS I NOK MILLION	NOTE	2024	2023	2022	2021	2020	2019	2018	2017	2016	2015
Return on equity (1)	41	**21.8%**	16.4%	11.9%	15.1%	12.6%	15.9%	12.9%	12.9%	12.0%	9.1%
Cost/income group (2)	23	**30.2%**	35.0%	40.3%	40.6%	40.0%	39.8%	43.1%	41.2%	42.9%	54.2%
Cost/income parent bank (2)	23	**27.0%**	25.1%	31.6%	33.7%	37.7%	28.8%	38.8%	36.9%	35.4%	52.4%
Gross loans to customers incl comission loans (3)	11	**152 981**	145 742	133 243	125 739	127 122	121 734	114 117	105 485	96 287	88 403
Growth in loans incl comission loans last 12 months (3)	11	**5.0%**	7.7%	6.0%	–1.1%	4.4%	6.7%	8.2%	9.6%	8.9%	4.0%
Growth in loans last 12 months	11	**3.9%**	5.6%	3.9%	1.1%	3.8%	6.0%	7.8%	6.0%	10.5%	4.6%
Deposits from customers	35	**87 618**	82 495	79 484	76 149	73 158	68 030	63 985	57 849	53 870	48 087
Growth in deposits last 12 months	35	**6.2%**	3.8%	4.4%	4.1%	7.5%	6.3%	10.6%	7.4%	12.0%	5.1%
Share of loans transferred to SB 1 Boligkreditt of total loans to retail customers	12	**48.8%**	48.0%	44.1%	41.7%	42.5%	41.3%	39.8%	40.0%	36.7%	38.2%
Share of loans transferred to SB 1 Boligkreditt of total loans to customers	12	**31.8%**	31.1%	29.8%	28.4%	29.3%	29.6%	29.1%	28.9%	26.5%	27.5%
Deposits as a percentage of gross lending incl comission loans (4)	35	**57.3%**	57.5%	59.7%	60.6%	57.6%	55.9%	56.1%	54.8%	55.9%	54.4%
Deposits as a percentage of gross lending (5)	35	**85.4%**	83.5%	85.0%	84.6%	82.2%	79.4%	79.1%	77.1%	76.1%	75.1%
Total assets		**135 673**	128 138	122 319	119 180	117 298	111 524	106 156	97 186	90 501	85 403
Average assets (6)		**132 721**	127 155	122 377	120 264	115 736	108 989	101 855	93 905	89 168	84 039
Branches		**15**	15	15	15	36	38	38	38	38	62
Number of man-years (Group)	22	**986**	956	852	853	897	904	841	784	774	830
Number of man-years (parent bank)	22	**541**	521	508	515	565	584	559	538	510	618
Number of man-years (subsidiares)	22	**445**	435	344	338	332	320	282	246	264	212
Net other operating income of total income	21	**23.3%**	26.9%	30.4%	34.8%	32.0%	27.1%	30.9%	29.9%	30.0%	34.6%
Common Equity Tier 1 Capital	5	**14 054**	13 466	12 351	13 097	12 019	11 472	10 334	9 992	9 155	8 367
Common Equity Tier 1 Capital Ratio	5	**16.8%**	17.1%	17.3%	18.7%	17.5%	17.2%	14.5%	14.9%	15.0%	13.9%
Tier 1 Capital	5	**15 728**	14 847	13 082	14 001	12 991	12 496	11 396	10 857	9 951	9 110
Tier 1 Capital Ratio	5	**18.8%**	18.9%	18.3%	20.0%	18.9%	18.8%	16.0%	16.2%	16.3%	15.1%
Own funds	5	**17 829**	16 824	14 230	15 109	14 366	13 726	12 904	12 141	11 229	10 358
Total Capital Ratio	5	**21.3%**	21.4%	19.9%	21.6%	20.9%	20.6%	18.1%	18.1%	18.4%	17.2%
Total risk exposure amount	5	**83 678**	78 527	71 399	70 059	68 588	66 609	71 167	67 223	61 120	60 328
Leverage Ratio	5	**7.8%**	7.9%	7.4%	8.3%	7.6%	7.7%	7.2%	7.2%	7.0%	6.1%
Losses on loans to customers as a percentage of gross loans incl comission loans (3)	13	**0.07%**	0.08%	0.05%	–0.18%	0.26%	0.01%	0.02%	0.17%	0.22%	0.22%
Non-perf. commitm. as % of gross loans incl commission loans (3)	13	**1.16%**	0.59%	0.49%	0.43%	0.29%	0.29%	0.37%	0.84%	0.31%	0.30%
Other doubtful commitm. as % of gross loans incl commission loans	13	**0.91%**	0.40%	0.35%	0.27%	0.16%	0.16%	0.23%	0.65%	0.37%	0.39%
Net commitments in default and at risk of loss as a percentage of gross loans incl commission loans (7)	13	**21.40%**	31.60%	28.90%	36.70%	44.80%	43.20%	38.40%	23.76%	30.08%	32.82%

1) The profit after tax in relation to average equity, calculated as a quarterly average of equity and as at 1 January and 31 December. The Bank's hybrid capital instruments are classified as equity in the financial statements. However, when calculating the return on equity, the hybrid capital is not included and the associated interest costs are adjusted for in the result

2) Total costs in relation to total net income

3) Intermediary loans include loans transferred to SpareBank 1 Boligkreditt AS and SpareBank 1 Næringskreditt AS, which have been derecognised from the balance sheet

4) Customer deposits as a percentage of gross lending, inclusive of intermediary loans

5) Customer deposits as a percentage of gross lending

6) Average total assets is calculated as an average of the opening balance on 1 January, quarterly total assets, and the closing balance on 31 December

7) Stage 3 loss provisions in relation to total non-performing and impaired commitments

Key figures ECC NONG

Hybrid capital issued in SpareBank 1 Nord-Norge amounting to NOK 600 million is not covered by the definition of debt in the IFRS regulations and is therefore classified as equity. Based on this, NOK 60 million in accrued interest on the hybrid capital has not been recognised as a cost in the income statement but has been charged directly against equity. When calculating key figures for equity and the equity certificates, accrued interest on hybrid capital is thus deducted from the accounting result. At the same time, hybrid capital is deducted from the equity in the balance sheet. This ensures that the key figures relevant to the Bank's owners are calculated on the basis of the result and the equity that actually belong to the owners. Also see note 41.

	NOTE	**2024**	2023	2022	2021	2020	2019	2018	2017	2016	2015
NONG Quoted/market price 1)		**123.48**	103.20	96.00	112.60	74.60	78.50	62.80	62.25	52.25	36.70
Number of Equity Certificates (EC) issued 2)	41	**100 398**	100 398	100 398	100 398	100 398	100 398	100 398	100 398	100 398	100 398
Allocated dividend per EC 3)	42	**8.75**	7.00	8.20	10.40	3.90	4.00	4.00	4.00	3.45	2.00
Equity capital per EC Group 4)		**81.33**	72.47	70.62	72.39	65.76	61.84	56.70	54.34	50.84	46.00
Result per EC Group, adjusted for interest hybrid capital 5)	42	**16.30**	11.36	8.25	10.41	7.89	9.39	7.03	6.61	5.54	5.10
P/E (Price/Earnings per EC Group) 6)		**7.6**	9.0	11.8	10.8	9.5	8.4	8.9	9.4	9.0	8.9
P/B (Price/Book Value per EC Group) 7)		**1.5**	1.4	1.4	1.5	1.1	1.3	1.1	1.1	1.0	0.8
Pay-out ratio Group 8)	42	**53.65%**	61.60%	99.35%	99.94%	49.40%	42.60%	56.90%	60.50%	59.63%	48.65%
EC ratio overall as at 01.01. used for allocaton of result	41	**46.36%**	46.36%	46.36%	46.36%	46.36%	46.36%	46.36%	46.36%	46.36%	46.36%

1) Quoted/market price ajusted for equity issues, fund issues, dividend issues and splits

All key figures are adjusted with the same factor as the quoted/market price

2) Number of certificates issued

3) Allocated dividend

4) Equity excl. hybrid capital Group*EC ratio overall/Number of EC

5) Anualised result after tax Consern*EC ratio overall/Number of EC

6) Market price/Result per EC Group adjusted for interests hybrid capital

7) Market price/Book value per EC Group

8) Dividend per EC/Result per EC Group

Group Profit Analysis

From income statement

(AMOUNTS IN NOK MILLION)	**2024**	2023	2022	2021	2020	2019	2018	2017	2016	2015
Interest income	**7 887**	6 561	3 824	2 542	2 927	3 320	2 795	2 611	2 548	2 702
Interest costs	**3 859**	2 934	1 268	528	859	1 223	899	841	904	1 190
Net interest income	**4 028**	3 627	2 556	2 014	2 068	2 097	1 896	1 770	1 644	1 512
Dividend and other income from investments	**907**	45	294	568	598	827	380	438	440	407
Fees and commissions receivable	**1 086**	962	1 088	1 267	1 161	1 035	978	931	871	908
Fees and commissions payable	**81**	90	79	96	82	107	95	85	85	75
Net gain/loss on securities and foreign exchange	**150**	138	–20	226	95	84	83	114	69	–158
Other operating income	**536**	532	225	328	220	188	174	146	138	100
Net overall contribution	**6 626**	5 214	4 064	4 307	4 060	4 124	3 416	3 314	3 077	2 694
Wages, salaries an general administration costs	**1 667**	1 516	1 329	1 408	1 330	1 358	1 202	1 101	1 066	1 218
Depreciation etc. on fixed- and intangible assets	**84**	88	92	104	109	120	61	65	60	56
Other operating costs	**252**	221	216	236	187	162	211	200	194	187
Result before losses	**4 623**	3 389	2 427	2 559	2 434	2 484	1 942	1 948	1 757	1 233
Losses on loans and guarantees	**110**	116	63	–235	332	11	22	184	213	200
Profit before tax	**4 513**	3 273	2 364	2 794	2 102	2 473	1 920	1 764	1 544	1 033
Tax	**849**	725	513	499	360	409	374	324	291	163
Result non-current assets held for sale						–2	–4			–5
Profit for the year	**3 664**	2 548	1 851	2 295	1 742	2 062	1 542	1 440	1 253	865
Minority interests	**33**	27	27	12						–7
Majority interests	**3 631**	2 521	1 824	2 283	1 742	2 062	1 542	1 440	1 253	872

From income statement

IN % OF AVERAGE ASSETS	**2024**	2023	2022	2021	2020	2019	2018	2017	2016	2015
Interest income	**5.94%**	5.16%	3.12%	2.11%	2.53%	3.05%	2.74%	2.78%	2.86%	3.22%
Interest costs	**2.91%**	2.31%	1.04%	0.44%	0.74%	1.12%	0.88%	0.90%	1.01%	1.42%
Net interest income	**3.03%**	2.85%	2.09%	1.67%	1.79%	1.92%	1.86%	1.88%	1.84%	1.80%
Dividend and other income from investments	**0.68%**	0.04%	0.24%	0.47%	0.52%	0.76%	0.37%	0.47%	0.49%	0.48%
Fees and commissions receivable	**0.82%**	0.76%	0.89%	1.05%	1.00%	0.95%	0.96%	0.99%	0.98%	1.08%
Fees and commissions payable	**0.06%**	0.07%	0.06%	0.08%	0.07%	0.10%	0.09%	0.09%	0.10%	0.09%
Net gain/loss on securities and foreign exchange	**0.11%**	0.11%	–0.02%	0.19%	0.08%	0.08%	0.08%	0.12%	0.08%	–0.19%
Other operating income	**0.40%**	0.42%	0.18%	0.27%	0.19%	0.17%	0.17%	0.16%	0.15%	0.12%
Net overall contribution	**4.99%**	4.10%	3.32%	3.58%	3.51%	3.78%	3.35%	3.53%	3.45%	3.21%
Wages, salaries and general administration costs	**1.26%**	1.19%	1.09%	1.17%	1.15%	1.25%	1.18%	1.17%	1.20%	1.45%
Depreciation etc. on fixed- and intangible assets	**0.06%**	0.07%	0.08%	0.09%	0.09%	0.11%	0.06%	0.07%	0.07%	0.07%
Other operating costs	**0.19%**	0.17%	0.18%	0.20%	0.16%	0.15%	0.21%	0.21%	0.22%	0.22%
Result before losses	**3.48%**	2.67%	1.98%	2.13%	2.10%	2.28%	1.91%	2.07%	1.97%	1.47%
Losses on loans and guarantees	**0.08%**	0.09%	0.05%	–0.20%	0.29%	0.01%	0.02%	0.20%	0.24%	0.24%
Profit before tax	**3.40%**	2.57%	1.93%	2.32%	1.82%	2.27%	1.89%	1.88%	1.73%	1.23%
Tax	**0.64%**	0.57%	0.42%	0.41%	0.31%	0.38%	0.37%	0.35%	0.33%	0.19%
Result non-current assets held for sale										–0.01%
Profit for the year	**2.76%**	2.00%	1.51%	1.91%	1.51%	1.89%	1.51%	1.53%	1.41%	1.03%
Minority interests	**0.02%**	0.02%	0.02%	0.01%						–0.01%
Majority interests	**2.74%**	1.98%	1.49%	1.90%	1.51%	1.89%	1.51%	1.53%	1.41%	1.04%

Average total assets is calculated as the average of quarterly total assets as at 1 January and 31 December.
Calculated average total assets for 2024 was MNOK 132 721.
Total assets correspond to the total of capitalised assets for the Group.

The Board of Directors' Annual Report

The Board of Directors' Annual Report

Key Figures Group 2024

(SAME PERIOD 2023)

Result for the year: MNOK 3,663 (MNOK 2,548)

Return on equity: 21.8% (16.4%)

Cost-income ratio: 30.2% (36.0%)

Earnings per equity certificate: NOK 16.30 (NOK 11.36)

Net income from financial assets: MNOK 1,057 (MNOK 183)

Growth in lending (RM and CM past 12 months: 5.0% (7.7%)
incl. intermediary loans

Growth in deposits (RM and CM) past 12 months: 6.2% (3.8%)

Deposit-to-loan ratio: 85% (84%)

Common Equity Tier 1 (CET1) capital ratio: 16.8% (17.1%)

Provision for dividends: NOK 8.75 (NOK 7.00)

At the beginning of 2024, there were high expectations that interest rates would decrease and inflation would be brought under control. The outcome shows that the interest rate remained unchanged, while the krone further weakened against key trading partners.

Inflation in Norway has decreased somewhat, but Norges Bank's target of 2 percent has not yet been reached. The war in Ukraine continued with undiminished intensity, and the war in the Middle East escalated. Meanwhile, there was a presidential election in the USA, and the new president is threatening allies with tariffs and withdrawing the USA from NATO. This increases uncertainty for 2025. 2024 was also marked by uncertainty and a year characterized by global turmoil. Central banks around the world have lowered interest rates during 2024, and Norway is possibly the only Western country that has not reduced its interest rate. This has weighed on the Norwegian economy, resulting in low economic growth and declining productivity. Fortunately, this has so far not had a significant negative effect on unemployment in Norway. New housing construction in 2024 was at a historically low level, and the construction industry is struggling. However, there have been few and small bankruptcies so far. Other industries have managed well through 2024, although the situation is more challenging than it has been for several industries in a long time.

Northern Norway is also affected by the macroeconomic situation with high interest rates and low activity in the new housing market. The reduction in cod quotas is challenging for the fishing industry, and researchers indicate that the quota will be further reduced in 2026 before it hopefully turns around. Unemployment in the region remains low, and prices for both seafood and used homes have developed positively throughout the year, with seafood prices also benefiting from the exchange rate. Over time, SpareBank 1 Nord-Norge (SNN) has had a low level of defaults, but there has been some increase during 2024, and it is clear that many find the current interest rate level challenging. However, Northern Norway has a diverse business sector, with some very profitable industries, and a relatively higher proportion of public sector activity compared to the rest of the country. The region is export-oriented, and the low exchange rate contributes to good earnings for everything from minerals, heavy industry (smelters, etc.), to seafood and tourism. New records are constantly being set in export value from the seafood and tourism industries in the region.

The business sector in Northern Norway has generally managed well through 2024 despite high interest rates. A moderate interest rate reduction is expected during 2025, which will help kickstart housing construction. There is a significant underlying demand for housing, as illustrated by the high turnover and good price development of used homes.

The financial result of SpareBank 1 Nord-Norge in 2024 is largely influenced by a high interest rate, which provides good margins on deposits. There has been good growth in both deposits and loans in 2024, demonstrating that SpareBank 1 Nord-Norge is competitive in the market. At the same time, there is tough competition for customers, and together with the high policy rate, this puts significant pressure on loan margins. After several poor years, the SpareBank 1 alliance is delivering better results in 2024, and it is expected that this will continue and further improve in the future. Losses in SNN are at about the same level as in 2023 and are still historically at a relatively low level. Overall, the bank delivers a very good result. The main contributors to this are solid banking operations and increased contributions from the alliance, but two one-time events have given the result an extra boost. One is the merger between Fremtind and Eika, which has resulted in an effect of MNOK 452. In addition, the SpareBank 1 Nord-Norge Pension Fund has been decided to be liquidated with a subsequent transfer of the business to SpareBank 1 Insurance. This will be completed in 2025, but according to IFRS, the value of the bank's receivable and equity in the pension fund as at 31.12.24 has been adjusted in accordance with the agreement. This gives a preliminary calculated accounting gain of MNOK 176. The final gain will be determined in 2025 after the liquidation accounts for the pension fund are completed and approved by the Financial Supervisory Authority.

In 2025, the long-awaited reduction in the policy rate is hopefully coming. This is good for the Norwegian and Northern Norwegian economy, but in the short term, it will slightly weaken the bank's margin. In the long term, however, it will have a positive effect, as what is good for the region will be good for the bank. SpareBank 1 Nord-Norge's vision – for Northern Norway means in practice that 'better than anyone else, SNN shall understand and do what is important for the people and businesses in Northern Norway.' This is just as important in 2025 as it was in 2024. SpareBank 1 Nord-Norge stands on a solid foundation of capital, competence, and decisiveness. This provides a good basis for continuing to create value for SNN's owners and to fulfil SNN's vision.

Financial goals and their attainment

In 2024, the group met all financial targets, including overall profitability goals, which aim to have banking operations among the top comparable financial groups. When assessing the specific ongoing target of return on equity, a comparison is made against other banks' profitability targets and actual profitability. Additionally, an assessment of the capital market's profitability expectations is made through forecasts from bank analysts. The above indicates that the return target for 2024 was 13 percent. With an achieved return on equity for 2024 of 21.8 percent, the target has been met with a good margin. For 2025, the conditions are somewhat more challenging due to falling interest rates and uncertainty around, among other things, the construction industry, but the goal of return on equity in line with the best comparable financial groups remains firm.

The goal of a long-term cost percentage of a maximum of 40 percent is subordinate to the group's strategic profitability goals. According to the board's assessment, developments in the financial sector necessitate strict cost management and a continuous search for efficiency through digitalization and process simplification. Therefore, in 2024, the bank launched a simplification project with a long-term goal of reducing annual costs by NOK 40-50 million, all else being equal. There will not be significant effects in 2025, but by 2027, the group should see the full effect. The cost-to-income (C/I) ratio for 2024 was 30.2 percent. Looking at core banking operations alone, the group is well within the target with a C/I ratio of 36.7 percent. The reason for maintaining a long-term cost percentage of 40 percent is a desire to have an efficiency target that is well-suited for comparison with other players. Additionally, a relative target also takes the income side into account, which is especially important in a time of significant business transformation. Although the bank was well within the cost target in 2024, it is perceived as an ambitious goal in the long term.

The group has an overarching financial goal of being indisputably solid, with a Common Equity Tier 1 (CET1) capital ratio one percentage point above the regulatory minimum requirement. As at 31.12.24, this translates to a target CET1 capital ratio of one percent above the regulatory minimum, currently 15.8 percent, while the calculated CET1 capital ratio is 16.8 percent. The result for 2024 is characterized as good, and the group's solidity is strong. During 2025, CRR3 will be introduced, and a new Norwegian-specific floor for risk weights on mortgages for IRB banks will be implemented. The implementation of CRR3 provides a slight positive effect on CET1 (approximately 20 basis points), but this is counteracted by the negative effect related to the implementation of the risk weight floor on mortgages. The combined effect of both CRR3 and the floor is currently assessed to have a negative effect on CET1 of approximately 40 basis points. This indicates that the bank will need to hold more regulatory capital from 2025 onwards, which, together with expected growth, has influenced the size of the proposed dividend for 2024.

STRATEGIC OBJECTIVES	TARGETS	2024	2023	2022	2021	2020	2019
Profitability							
Return on equity	Bank operations at the top among comparable financial groups, currently at 13% or higher.	**21.8%**	16.4%	11.9%	15.1% 14.1%[3]	12.6% 10.1%[1]	15.9% 12.3%[1] 12.8%[2]
Efficiency							
Costs	Cost/income ratio 40% or lower	**30.2%**	36%	40.3%	40.6% 38.3% [3]	40% 43.7%[1]	39.8% 44.8%[1] 42.9%[2]
Solvency							
Common Equity Tier 1 (CET1) capital ratio	Unquestionably solid. CET1 capital ratio one percentage point above the regulatory minimum requirement. Currently at 15.80% or higher.	**16.8%**	17.15%	17.30%	18.70%	17.50%	17.22%
Dividends							
Pay ratio Group	50% or higher.	**53.7%**	61.6%	99.3%	99.4%	49.4%	42.6%

1 Exclusive profit merger
2 Exclusive profit merger and restructuring costs
3 Exclusive gain sale Helgeland portfolio, compensation loss, termination of benefit-based service pension

Parent company

SpareBank 1 Nord-Norge is the Group's parent company, and its head office is the Rødbanken building in Tromsø. 53.6 per cent of the Bank is owned by the northern Norwegian community and and 46.4 per cent by private investors, of whom 18.3 per cent are northern Norwegian EC holders. The Bank's core business is to provide finance for northern Norwegian businesses and households. SpareBank 1 Nord-Norge thus sets the stage for value creation and growth in the region in keeping with our vision: For Northern Norway.

Subsidiaries and sub-subsidiaries

SpareBank 1 Nord-Norge's customers are offered a complete portfolio from the parent bank and the other companies that make up the Group.

The figures in the table are based on preliminary financial statements from the subsidiaries, which have been used in the 2024 consolidated financial statements. The financial statements have subsequently been audited, and some minor adjustments have been made.

NOK MILLION	OWNERSHIP	EQUITY	RESULT 2024	RESULT 2023	DIVIDEND 2024	DIVIDEND 2023
SpareBank 1 Finans Nord-Norge AS	85%	1,584	**184**	165	**167**	133
SpareBank 1 Regnskapshuset Nord-Norge AS	85%	172	**6**	10	**3**	12
EiendomsMegler 1 Nord-Norge AS	85%	54	**25**	4	**9**	10
SpareBank 1 Nord-Norge Portefølje AS	100%	17		-1		
Finansmodell 1 AS	75%	3	**1**	1		
Fredrik Langes gate 20 AS	100%	346	**5**	3	**4**	
Rødbanken Holding AS (not consolidated)	100%					
Total		2,176	**221**	182	**183**	155

SpareBank 1 Finans Nord-Norge AS

The company is 85 per cent owned by Spare-Bank 1 Nord-Norge and 15 per cent owned by SpareBank 1 Helgeland. The company has commercial responsibility for the leasing and secured loan financing product areas, with Northern Norway as its primary market area. The Parent Bank, SpareBank 1 Helgeland and external agents are important distribution channels for the company.

The company has a strong earnings base and managed leasing and sales pledge agreements totaling MNOK 9,527 (MNOK 9,103) at the turn of the year. The company's book equity was MNOK 1,584 as at 31.12.24 (MNOK 1,467).

The return on equity for 2024 is calculated to be 13.1% (12.7%).

The prospects for increased future activity and satisfactory returns in the company are good.

The company is co-located with the bank in Bodø and Tromsø and had 41 FTEs as at 31.12.24, one more than as at 31.12.23.

EiendomsMegler 1 Nord-Norge AS

EiendomsMegler 1 Nord-Norge AS is a member of a nationwide alliance with other real estate companies owned by SpareBank 1 banks. The company is 85 per cent owned by SpareBank 1 Nord-Norge and 15 per cent owned by SpareBank 1 Helgeland. The company provides real estate agency services in 16 different locations in Northern Norway. Most of the branches are co-located with the Bank.

As at 31.12.24, there were 114 FTEs in EiendomsMegler 1 Nord-Norge, 5 more than as at 31.12.23.

The company is the market leader in Northern Norway and has maintained its position in most northern cities in an increasing total market. In 2024, 3,598 properties were brokered through EiendomsMegler 1 Nord-Norge AS, compared to 3,274 in 2023.

The company had a turnover of NOK 220 million (NOK 181 million), which corresponds to an increase of 22% compared to 2023.

The company's annual result after tax in 2024 is NOK 24.6 million (NOK 9.1 million).

The profit margin is 11% (5%). The return on equity for 2024 is calculated to be 22% (22%).

SpareBank 1 Regnskapshuset Nord-Norge AS

SpareBank 1 Regnskapshuset was established in 2012. The company is 85 per cent owned by SpareBank 1 Nord-Norge and 15 per cent owned by SpareBank 1 Helgeland. Regnskapshuset has completed a number of acquisitions and mergers since its establishment in 2012.

As at 31.12.24, the company had 290 FTEs (286 FTEs) and 15 branches in the region.

The focus on this sector is part of a collaboration with a number of the alliance banks with similar activities. The collaboration covers areas such as branded goods, IT, expertise, work processes and quality.

The SpareBank 1 Regnskapshuset Nord-Norge AS venture is motivated by a desire to exploit synergy effects with the Group's other activities. This includes increased sales across the Group, increased customer satisfaction and more efficient payment services. Examples include increased automation and integration of customers' billing systems, payment solutions and accounting.

The company recorded a total turnover of MNOK 357 in 2024, compared with MNOK 241 in 2023.

The company's profit for 2023 was MNOK 6.6 (MNOK 4.1).

The performance rate was 2% (1%). The return on equity capital for 2023 was 3 per cent (13 per cent).

The company continues to change and develop, and rapid digitalisation will require further measures and present new opportunities in the future. This includes the Bank+ Accounting venture under the auspices of the SpareBank 1 Alliance.

The company merged with the accounting firms Adwice AS, with 59 employees in Vesterålen and Lofoten, and Flex AS in Indre Salten with 10 employees as at 01.01.24.

Fredrik Langes gate 20 AS

The company leases out real estate (bank building) in Tromsø and recorded a profit for 2024 of MNOK 5.7 compared with MNOK 4 in 2023.

The value of its assets as at 31.12.24 was recorded as MNOK 350 (MNOK 348), and its equity amounted to MNOK 346 (MNOK 340).

The company is 100 per cent owned by the Bank, is administered by the Bank and has no employees.

SpareBank 1 Nord-Norge Portefølje

As part of the Group's greater focus on its core activities, this company's former business is being restructured/wound up. SpareBank 1 Nord-Norge Portefølje has nevertheless been retained as a legal entity for legal and practical reasons. The object of the company is to "manage stakes owned by the SpareBank 1 Nord-Norge Group and business naturally associated with this". Parts of the business include managing ownership stakes that date from previous customer commitments in the Bank.

The market value of SpareBank 1 Nord-Norge Portfolio's investments was MNOK 8.6 as at 31.12.24 (MNOK 8.4), distributed as MNOK 6.9 in equity investments and MNOK 1.7 in subordinated loans, while the company's equity amounted to MNOK 16.7 (MNOK 16.9).

The company recorded a result for 2024 of MNOK –0.1 (MNOK –1.0).

SpareBank 1 Nord-Norge Portefølje AS is administered by the Bank and has no employees.

The company Finansmodell 1 AS was established in July 2023 as a subsidiary of SpareBank 1 Nord-Norge Portefølje with a 75 per cent stake. The company manages and develops a financial forecasting tool and recorded a profit after tax for 2024 of MNOK 1.1, and its equity as at 31.12.24 amounted to MNOK 3.5 (MNOK 2.7).

SpareBank 1 Alliance

NOK MILLION	OWNERSHIP	SHARE OF EQUITY	**SHARE OF RESULT 2024**	SHARE OF RESULT 2023	DIVIDEND 2024	**DIVIDEND 2023**	DIVIDEND 2023	DIVIDEND 2022
SpareBank 1 Gruppen AS	19.50%	2,401	**677**	–41	175		505	137
SpareBank 1 Boligkreditt AS	16.30%	2,196	**89**	65	1	**65**		12
SpareBank 1 Næringskreditt AS	0.58%	9	**1**	1	–	**2**	–	–
SpareBank 1 Kreditt AS	13.18%	413	**–9**	-8	9			
SpareBank 1 Betaling AS	17.94%	213	**–18**	–31	12			
SpareBank 1 Utvikling DA	18.00%	144	**2**	6	3			
SpareBank1 Forvaltning AS	12.08%	151	**35**	23	23	**16**	20	52
SpareBank 1 Bank og Regnskap AS	25.00%	43	**11**	1	1	**13**		
SpareBank 1 Mobilitet Holding AS	30.66%	–	**0**	–82	–22			
SpareBank 1 Gjeldsinformasjon AS	13.83%	1	**0**	0	–			
SpareBank 1 Markets AS	18.06%	411	**41**	8		**28**		
SpareBank1 Kundepleie AS				0	1			
Total		5 982	**827**	–56	203	**123**	525	201

The Bank's participation in the SpareBank 1 Alliance and its stakes in SpareBank 1 Gruppen AS and SpareBank 1 Utvikling DA constitute an important element of the Group's strategy. This participation has been important for SpareBank 1 Nord-Norge's positive development and has greatly contributed to the fact that the Bank has become a financially sound, strong bank – For Northern Norway.

The SpareBank 1 banks run the alliance and develop the product companies through the jointly-owned SpareBank 1 Utvikling DA and SpareBank 1 Gruppen AS, the holding company. The purpose of the SpareBank 1 Alliance is to procure and provide competitive financial products and services, and to achieve economies of scale in the form of lower costs and/or higher quality. This allows the alliance to offer retail and corporate customers specialist expertise, local roots and simpler day-to-day banking. The alliance should also help to ensure the creation of value by the banks for the benefit of their region and the banks' owners.

The alliance banks have opted to pool their ownership of the Norwegian financial services industry's infra-structure in SpareBank 1 Gruppen AS and SpareBank 1 Utvikling DA. This collective ownership allows the alliance banks to act as a major player both in the market within Norwegian banking partnerships and with respect to foreign market players. SpareBank 1 Nord-Norge owns 19.5 per cent of SpareBank 1 Gruppen AS and 18 per cent of SpareBank 1 Utvikling DA. The Bank owns a proportionately larger stake than the other owner banks because of its size. This makes the SpareBank 1 Alliance particularly important for the SpareBank 1 Nord-Norge Group, not least because the underlying values in the alliance companies are judged to be significant.

Review of the annual accounts

SpareBank 1 Nord-Norge's consolidated accounts are prepared in accordance with the International Financial Reporting Standards (IFRS), as approved by the EU, and Section 3-9 of the Norwegian Accounting Act. In compliance with requirements in Norwegian accounting legislation, Section 4-5 of the Accounting Act, the annual financial statements for 2024 have been prepared under the assumption of continued operations.

Profit development

AMOUNT IN NOK MILLION	GROUP 2024	GROUP 2023	PARENT BANK 2024	PARENT BANK 2023
Net interest income	**4,028**	3,627	**3,653**	3,260
Net commissions and other operating income	**1,541**	1,404	**993**	951
Net invome fraom financial investments	**1,056**	183	**510**	858
Operating costs	**2,003**	1,825	**1,391**	1,278
Losses	**110**	116	**85**	71
Result before tax	**4,512**	3,273	**3,680**	3,720
Tax	**849**	725	**781**	671
Year result	**3,663**	**2,548**	**2,099**	**3,049**

The Group and the parent bank have good earnings and solidity, as well as a satisfactory liquidity position and deposit-to-loan ratio.

Net interest income

Throughout 2024, there has been strong competition for loan customers, with pressure on interest terms. In addition, net interest income is affected by the bank's borrowing costs (funding costs in the money markets), as well as growth in loan and deposit volumes.

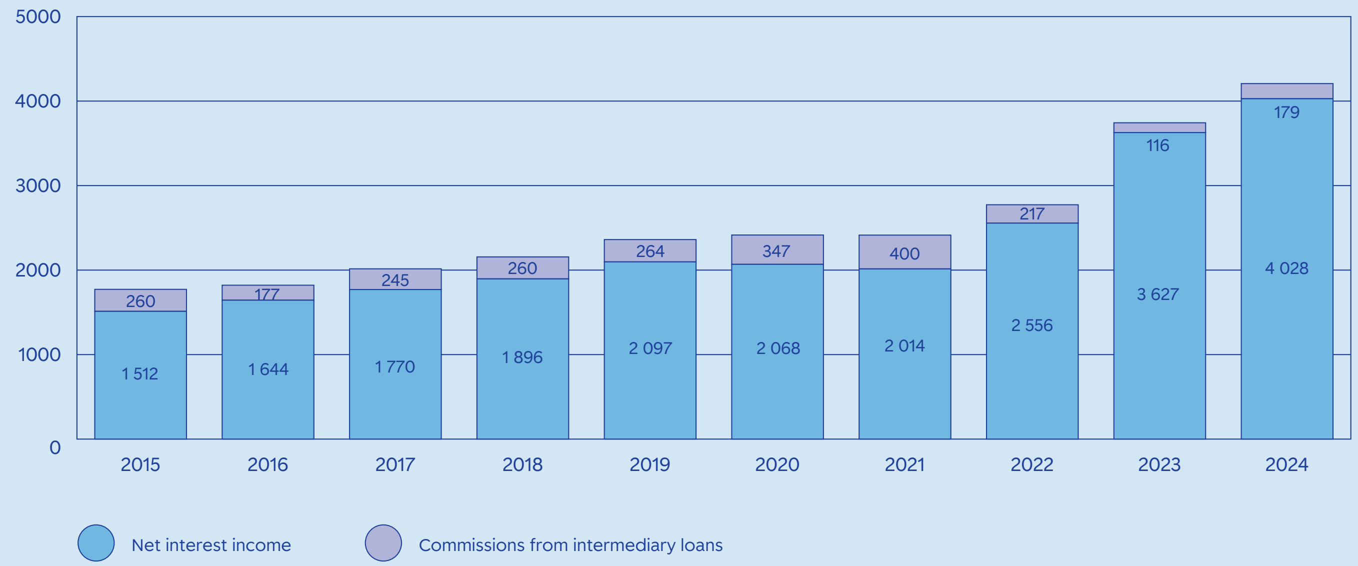
The bank's borrowing costs remained stable at the beginning of the year, then increased somewhat during the summer and autumn, before falling again slightly towards the end of the year. The average borrowing cost at the beginning of the year was 5.46% (3.88%), while at the end of the year it was 5.57%. Norges Bank has kept the key policy rate unchanged throughout the year at 4.50%, and the bank has also not made significant changes to customer interest rates.

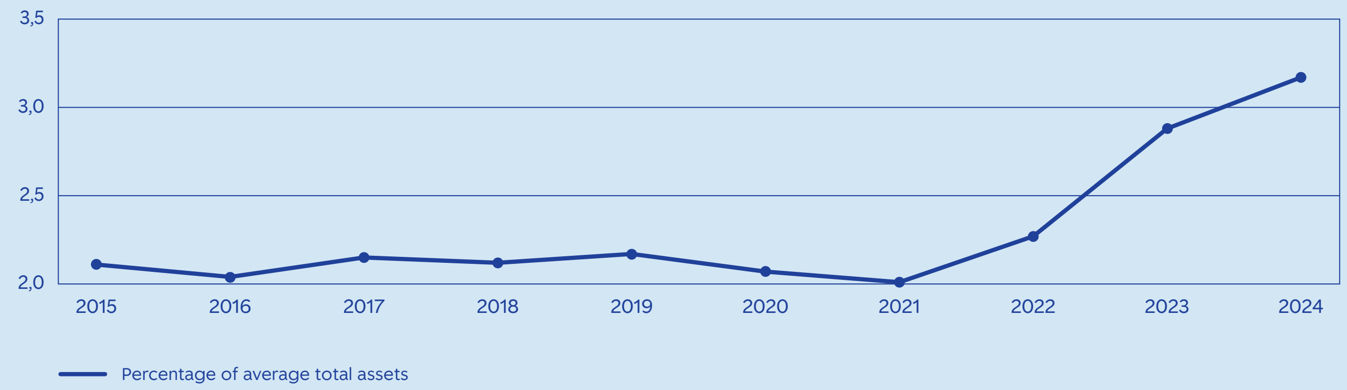
The parent bank's lending margin measured against the money market rate (NIBOR) has remained stable throughout the year due to stable money market rates.

The deposit margin has also remained at a stable level throughout the year. The group's total net interest income has thus increased by MNOK 401 from 2023 to 2024.

Loan growth in 2024 is 5.6% in the personal market and 3.8% in the corporate market. In the calculation of growth, new loans granted by the bank, which were subsequently sold to the alliance's credit institutions, are also included. The loan growth in 2024 is considered good. The development in net interest income is also affected by transferred loans to the alliance's credit institutions SpareBank 1 Boligkreditt AS and SpareBank 1 Næringskreditt AS. The income of MNOK 179 from the transferred portfolio is recorded under commission income. The corresponding figure for 2023 was MNOK 116.

Development in net interest income including commissions, and in relation to average assets under management the last 10 years:





Net commission and other income

SpareBank 1 Nord-Norge's objective is to increase income by offering a broad range of products, including in areas with no credit risk such as savings, investments and insurance. The subsidiaries also contribute to increased income within asset financing, real estate brokerage and accounting services.

In 2024, net commission and other income accounted for 28% of total income from the Group's core business. The corresponding figure for 2023 was 28%.

Commission income from SpareBank 1 Boligkreditt and SpareBank 1 Næringskreditt increased by MNOK 63 in 2024.

Other commission and other operating income in 2023 was as follows:

AMOUNT IN NOK MILLION	2024	2023	CHANGE
Provision commission loans	**179**	115	64
Sales provision insurance products	**202**	203	1
Payment facilities	**218**	192	26
Real estate broking	**233**	198	35
Accounting services	**335**	292	43
Other operating income	**374**	404	30
Total	**1,541**	1,404	137

The Group has over time worked actively on a variety of measures aimed at improving earnings in this area.

Income from financial investments

AMOUNT IN NOK MILLION	2024	2023	CHANGE
Income associated companies	**826**	–56	882
Share dividend	**81**	101	20
Net change value of equities	**163**	105	58
Net change value of bonds,	**–2**	39	41
currency and derivatives	**–11**	6	5
Net change value loans at fair value, included hedging	**1,057**	183	874
Income from financial investments	1,057	183	874

INCOME FROM OWNERSHIP INTERESTS

Result contributions from associated companies and joint ventures are recognised in the consolidated accounts using the equity method. The Group's share of the respective companies' results is shown in the income statement, which is included in "Income from financial investments".

The most important ownership interests are commented on below.

- The Group's result for 2023 was influenced by the profit contribution from SpareBank 1 Gruppen.
- There has been good financial returns and good insurance results at the insurance companies in 2024.
- SpareBank 1 Gruppen has included results from Kredinor in its consolidated financial statements since 01.05.24. As announced in the stock exchange announcement on 28.06.24, Eika Forsikring was included in Fremtind Holding's group at fair value from 01.07.24, which contributed to increasing the equity in the SpareBank 1 Gruppen group by BNOK 7. Of this, the share of controlling interests amounted to MNOK 2,317.
- The result for 2024 is MNOK 2,233 (MNOK 246).
- SpareBank 1 Nord-Norge's share of the result for 2024 is MNOK 225 (–MNOK 41). In addition, SNN's share of the aforementioned increase in value in SpareBank 1 Gruppen has been recognized as a gain of MNOK 452.
- SpareBank 1 Forvaltning AS manages and develops the alliance's savings products and its already strong concepts and brands, such as ODIN. The share of the result for 2024 is MNOK 31 (MNOK 23).
- From the company's ownership share in Vipps AS. The operating deficit from Vipps is incorporated into the accounts of SpareBank1 Betaling. SpareBank 1 Nord-Norge's share of the result for 2024 is a deficit of MNOK 18 (deficit of MNOK 31).
- The result of SpareBank 1 Boligkreditt is affected by the market interest rate. SNN's share of the result is MNOK 55 (MNOK 65).

- SpareBank 1 Markets took over SpareBank 1 Nord-Norge's market operations from December 2023. At the same time, the bank's ownership share in this company increased, and it is now accounted for as an associated company based on the equity method.
- The result of SB1 Markets for 2024 is MNOK 224.
- SpareBank 1 Nord-Norge's share of the result for 2024 is MNOK 41.

The jointly owned companies in the SpareBank 1 alliance have better earnings this year than previously. According to the board's assessment, there are significant underlying values in these companies. The completed mergers highlight some of these underlying values.

SHARES

As at 31.12.24, the Group's share portfolio amounted to MNOK 1,527 (MNOK 1,364).

During the year, the portfolio mainly consisted of shareholdings in Visa, BN Bank, SpareBank 1 Markets, and SpareBank 1 Helgeland. In addition, it has consisted of subordinated bonds that are classified as shares for accounting purposes.

The equity portfolio has had a net positive contribution of MNOK 163 over the past year. The total value of shares related to Visa as at 31.12.24 is MNOK 42 (MNOK 37). The shares in BN Bank have a value of MNOK 650 as at 31.12.24 (MNOK 561), and the equity certificates in SpareBank 1 Helgeland have a value of MNOK 780 (MNOK 712).

CERTIFICATES, BONDS, DERIVATIVES AND CURRENCY

As at 31.12.24, the Group's holdings of certificates and bonds amounted to MNOK 19,233 (MNOK 18,189).

After a decline in credit premiums during the first three quarters of the year, credit premiums increased significantly again in the last quarter of the year, with a negative impact on results.

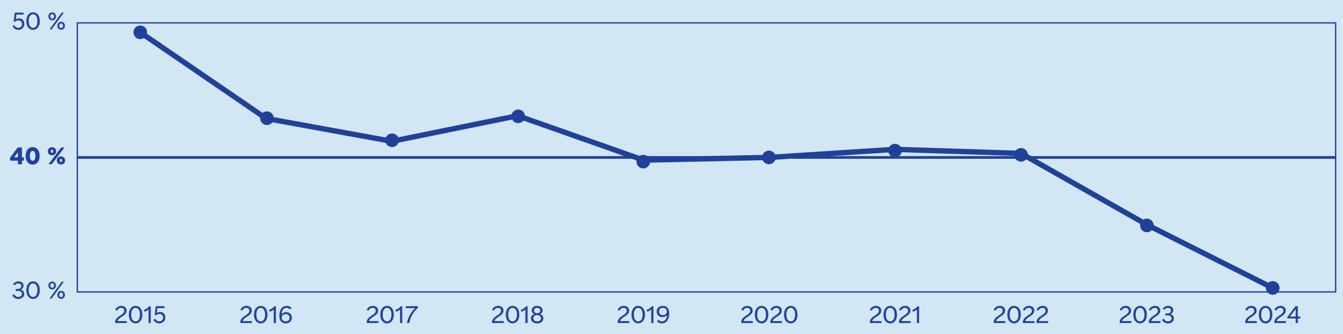
At the end of the year, there is a net negative value change of MNOK 2 for the year (MNOK 6).

OPERATING COSTS

AMOUNT IN NOK MILLION	2024	2023	CHANGE
Wage cost	**839**	786	53
Pension costs	**83**	61	22
Social costs	**181**	153	28
Administrative costs	**565**	516	49
Depreciation og fixed assets	**84**	88	4
Operating costs properties	**24**	21	3
Other operating costs	**227**	200	27
Total costs	**2,003**	**1,825**	**178**

The Group's costs in 2024 are 10% higher than in 2023.

CHANGE IN COST-INCOME RATIO OVER THE LAST 10 YEARS



The Group's long-term goal for the cost-income ratio (C/I) is 40% or lower. As at 31.12.24, this ratio was 30.2% (35.0%).

The Group's FTEs (incl. hourly emplyees) totalled 986 at the end of 2024. This is 30 more than in 2023 (20 more in the parent bank and 10 more in the subsidiaries).

Losses and defaults on loans

The group's net loan losses for 2024 amount to MNOK 110 (MNOK 116), distributed as MNOK 28 (–MNOK 9) from the personal market, and MNOK 82 (MNOK 125) from the corporate market.

Total loan and guarantee loss provisions as at 31.12.24 amount to MNOK 858, which is MNOK 42 higher than at the end of the previous year (MNOK 816). Loan loss provisions amount to 0.84% (0.83%) of the group's total gross loans and 0.57% (0.57%) of gross loans to customers, including loans transferred to SB1 Boligkreditt and SB1 Næringskreditt.

The group's total stage 3 loan and guarantee loss provisions as at 31.12.24 are MNOK 379 (MNOK 271). This corresponds to a provision rate of 33% (24%) of defaulted and impaired commitments. Stage 1 and 2 loan and guarantee loss provisions as at 31.12.24 amount to MNOK 479 (MNOK 546).

Underlying losses remain low. The group sees no clear general negative risk migration in the portfolio, but the marking of losses and defaults of some larger individual commitments has led to a steady increase in the level of stage 3 commitments over the past year. This has had little effect on loss provisions, and there are still relatively few bankruptcies in the loan portfolio. The group still has a solid and diversified customer portfolio with low to moderate risk, but vulnerable areas such as commercial real estate, construction, retail, and some fishing engagements are industries the bank pays close attention to and closely monitors.

Tax

The Group's tax charge for 2024 is estimated at MNOK 849 (MNOK 725). The tax base was reduced by permanent differences between the accounting and tax treatment of certain balance sheet items, as well as the effects of the exemption method.

Distribution of profit

The proposed profit distribution for 2024 is based on the group's profit after tax, adjusted for accrued interest on issued subordinated bonds. After this, the majority owners' share of the profit is distributed between the equity certificate holders and the bank's socially owned capital, according to the relative distribution of equity between the ownership groups in the parent bank as at 01.01.24, respectively 46.36% and 53.64%.

The bank received a notice from the Financial Supervisory Authority on 22.01.25 (announced on 23.01.25) with an order to change the distribution between the ownership groups for the years 2022 and 2023. The background for the order was that parts of the dividends/gifts to the community decided by the representatives' meeting, which were transferred from equity to debt in the balance sheet after the representatives' meeting in the spring of 2022 and 2023, were not allocated to a specific recipient by the end of the financial year. The Financial Supervisory Authority requests that these funds be returned to the primary capital, and a new relative distribution (ownership ratio) between the ownership groups must be calculated for 2022 and 2023. The effect of the order is estimated at MNOK 62 (total for the years 2022, 2023, and 2024) in under-allocated dividends to the primary capital/community, compared to the actual dividends decided by the representatives' meeting. Taking the order into account, the ownership ratio as at 31.12.24 would have been 46.20% (equity capital) and 53.80% (primary capital). The bank disagrees with this order, has appealed the case, and requested a suspensive effect. On this basis, the board recommends the following profit distribution for 2024:

Proposed Profit allocation

AMOUNT IN NOK MILLION	31.12.24	31.12.23	CHANGE
Parent Bank's profit after tax	**3,631**	2,520	1,110
Interests hybrid capital	**100**	60	40
Profit to allocate	**3,531**	2,460	1,070
Cash dividend per ECC (NOK)	**8.75**	7.00	1.00
Allocated to cash dividend	**878**	703	100
Allocated to dividend equalisation fund	**759**	438	396
Total to the equity certificate holders	**1,637**	1,141	496
Share of profit	**46.36%**	46.36%	0.00%
Allocated to donations	**1,016**	813	116
Allocated to the Saving Banks Fund	**878**	506	458
Total to the Bank's community-owned capital	**1,894**	1,319	574
Share of profit	**53.64%**	53.64%	0.00%
Total allocated	**3,531**	2,460	1,070
Withheld share of Group result	**46.4%**	38.4%	12.5%
Withheld share of Parent Bank result	**32.3%**	49.3%	–11.2%
Payout ratio Group	**53.7%**	61.6%	–12.5%
Payout ratio Parent Bank	**67.7%**	50.7%	11.2%

The distribution involves an equal distribution rate to the bank's equity certificate holders and to the community capital. The distribution rate amounts to a total of 67.7% (50.7%) of the parent bank's annual result and 53.7% (61.6%) of the group's annual result. In assessing the proposed dividend, thorough evaluations of the group's solidity, liquidity, and financial development have been carried out, including stress tests that show the consequences of negative scenarios. These assessments indicate that the proposed dividend is justifiable. As at 31.12.24, the capital adequacy, after the proposed dividend, is significantly higher than both regulatory requirements and internal goals. This means that the loss-absorbing capacity is substantial. However, it should be noted that the Financial Supervisory Authority can, when considering the financial institution's solidity, order the bank not to distribute dividends or to distribute less than what is proposed by the board or decided by the representatives' meeting.

The bank will continue to emphasize providing a competitive direct return for the bank's owners. However, the future distribution rate will have to take into account the group's capital adequacy and opportunities for future profitable growth. The board recommends a dividend of MNOK 1,891, equivalent to 53.7% of the group's result, and NOK 8.75 per equity certificate (EKB). The dividend will be paid to the equity certificate holders who are registered as owners as at 08.04.25. The bank's equity certificates will be listed ex-dividend on 09.04.25. The equity certificate holders' share of the equity (ownership ratio) does not change and is calculated to be 46.36% as at 01.01.25.

Cash flow analysis

The total cash flow from operations in the group was MNOK 3,857 (MNOK 2,752). Cash flow from operations was MNOK 3,655 (MNOK 1,720), while the group's profit after tax amounted to MNOK 3,663 (MNOK 2,548). The difference is mainly due to loan growth and an increased holding of certificates and bonds. The group's total investments in 2024 amounted to –MNOK 1,316 (–MNOK 136). This year's investments have largely gone to jointly controlled businesses in the alliance.

The Group's liquidity holdings as at 31.12.24 amounted to MNOK 2,001 (MNOK 1,251). The Group's ability to self-finance investments is good.

See also the cash flow statement included as part of the annual accounts.

Balance sheet performance

As at 31.12.24, loans totalling BNOK 48 (BNOK 45) had been sold to SpareBank 1 Boligkreditt, and BNOK 0.08 (BNOK 0.1) had been sold to SpareBank 1 Næringskreditt. These loans, termed intermediary loans, do not appear as lending on the Bank's balance sheet.

AMOUNT IN NOK MILLION	31.12.24	31.12.23	CHANGE
Retail lending	**98,027**	92,823	5.6%
Corporate lending	**52,544**	50,615	3.8%
Total lending customers incl. intermediary loans	**150,571**	143,438	5.0%
Total lending customers excl. intermediary loans	**102,654**	98,789	3.9%
Deposits retail	**46,020**	43,818	5.9%
Deposits corporate[1]	**41,640**	38,677	6.6%
Total deposits	**87,660**	82,495	6.3%
Deposits as % of lending excl. intermediary loans	**85.4%**	83.5%	2.3%
Total assets	**135,673**	128,138	5.9%

[1] *Incl. government market*

In the case of new loans, particular importance is attached to customers' debt-servicing ability and a satisfactory level of collateral to ensure that credit risk is kept to an acceptable level.

There is strong competition, especially in the mortgage market, but the Group is competitive and is taking market shares.

The personal market accounted for 65% of overall lending as at 31.12.24 (65%).

Liquidity

The Bank's most important source of funding is customer deposits. At the end of 2024, the deposit-to-loan ratio (excluding intermediary loans) was satisfactory at 85% (84%). In addition to subordinated capital and customer deposits, long-term borrowing from the capital market mainly represents the bank's other financing. The Bank's access to liquidity and the key figures for liquidity are satisfactory.

The Bank's aim is to keep overall liquidity risk at a low level. According to the LCR Regulation, institutions are required, at all times, to maintain a liquidity coverage ratio (LCR) of at least 100 per cent for all currencies combined. This entails institutions' holdings of liquid assets having to at least match their net liquidity outflow for at least 30 days ahead in a stress situation in the money and capital markets. LCR as at 31.12.24 was 147% (150%).

In addition, institutions are subject to a general requirement as regards stable, long-term funding, the net stable funding ratio (NSFR). The Group's NSFR was 117% as at 31.12.24 (117%).

Financial strength and capital adequacy

SpareBank 1 Nord-Norge aims to maintain an indisputably solid financial position and comply with the regulatory minimum capital adequacy requirements at all times. The Group's target for its CET1 capital ratio is 1 percentage point above the regulatory minimum requirement, which resulted in a target for the CET1 capital ratio of 15.8% at the end of 2024.

SpareBank 1 Nord-Norge uses IRB models to calculate capital requirements for credit risk. The use of IRB imposes wide-ranging requirements on the Bank's organisation, competence, risk models and risk management systems.

The Group uses proportional consolidation for its capital adequacy reporting for the stakes in SpareBank 1 Boligkreditt AS, SpareBank 1 Næringskreditt AS, SpareBank 1 Kreditt AS, BN Bank AS and SpareBank 1 Markets AS.

Capital Adequacy Ratio per 31.12.24	GROUP 31.12.24	GROUP 31.12.23	CHANGE	PARENT BANK 31.12.24	PARENT BANK 31.12.23	CHANGE
Common Equity Tier 1 capital ratio	**16.8%**	17.1%	0.3%	**19.8%**	20.0%	–0.2%
Tier 1 Caital Ratio	**18.8%**	18.9%	–0.1%	**21.8%**	21.8%	0.0%
Capital Adequacy Ratio	**21.3%**	21.4%	0.0%	**26.5%**	24.4%	2.1%
Leverage Ratio	**7.8%**	7.9%	–0.1%	**11.1%**	11.0%	0.1%

The group's CET1 capital was MNOK 588 higher as at 31.12.24 than as at 31.12.23. This is mainly due to the effect of the results.

Total risk weighted assets (RWA) rose by around BNOK 5.15 over the year, mainly due to increased lending exposure.

The Bank's financial strength is considered good in relation to the current and upcoming regulatory requirements and risk exposure.

Events after the balance sheet date

No events have occurred after the balance sheet date that are considered to have a material bearing on the Group's profit and/or financial position.

The payout of a cash dividend of MNOK 878 from the profit for the year to the EC holders of SpareBank 1 Nord-Norge and MNOK 1,016 as community dividends for the community owned capital has been proposed. This proposal has not been adopted as at the balance sheet date, and it has therefore not been recognised as a liability on the balance sheet but is still included in equity pending a final decision by the Supervisory Board on 8 April 2024.

Risk management and internal control

Risk and capital management at SpareBank 1 Nord-Norge aims to support the Group's strategic development and goal attainment, and at the same time ensure financial stability and prudent asset management.

The year 2024 was marked by a continuation of the geopolitical and macroeconomic turmoil following Russia's invasion of Ukraine in 2022, as well as the hostilities in the Gaza Strip that began in 2023. However, experiences from previous crises, and the group's own analyses and stress tests, show that the group's financial position is robust. Over time, the group has maintained a low to moderate risk appetite, with good structures for managing and controlling risk exposure.

The group has solidity, liquidity, and a risk profile that enables the achievement of business strategic goals, even in challenging macroeconomic situations. Read more about risk management and internal control in SpareBank 1 Nord-Norge in the corporate governance statement, the financial risk management note, and the group's pillar 3 report.

Regulatory framework

General

Regulatory requirements are changing apace, and this is expected to continue ahead. The Group identifies, assesses and adapts to regulatory changes on an ongoing basis.

This is done to ensure:

- Compliance with regulatory requirements.
- Handling of business-related implications.

System for follow-up internally in SpareBank 1 Nord-Norge

The Group has established a system for close follow-up of regulatory changes through, inter alia:

- Compliance committee.
- Joint cooperation in this area across the entities in SpareBank 1-alliansen ('Regulatory radar').
- Quarterly reporting to the Board of Directors by both the first and second line of defence with regard to regulatory changes, including their content, timeline for implementation and implications, along with compliance.
- Annual reporting to the Board of Directors (ICAAP) with regard to regulatory changes, including their content, timeline for implementation and implications, along with compliance.

Key regulatory changes in 2024 and ahead

Key changes in 2024 and regulatory changes announced for the coming years can be briefly summarised as follows:

Capital/financial strength

Countercyclical capital buffer: As a result of the Covid-19 pandemic the countercyclical capital buffer requirement was in March 2020 lowered from 2.5% to 1%. Through 2021 and 2022 the countercyclical capital buffer was raised on three occasions by a total of 1.5 percentage points, to a maximum level of 2.5%. The buffer requirement has been maintained at this level throughout 2024.

Systemic risk buffer: The Ministry of Finance decided in December 2022 to keep the systemic risk buffer requirement unchanged at the maximum level of 4.5%. This has been maintained throughout 2023 and 2024.

Risk weight floor: The Ministry of Finance decided in December 2024 that the previously set risk weight floor of 20% for residential mortgages will be increased to 25%. The floor will come into effect on July 1, 2025. The floor of 35% for commercial property loans will be maintained.

Updated SREP Circular: In December 2024, the Financial Supervisory Authority of Norway (Finanstilsynet) published an updated SREP circular. The most significant changes are related to interest rate risk (IRRBB).

Pillar 2 decision (SREP): Current Pillar 2 decision (P2R) is at 1.4%, along with 1% in P2G. An updated Pillar 2 decision is expected during 2025.

MREL: In 2024, Finanstilsynet updated and established the minimum requirement for the sum of own funds and eligible debt (MREL) for SpareBank 1 Nord-Norge. As at 31.12.24, the binding requirement for the bank is set at 35.20% of the currently applicable adjusted risk-weighted calculation base.

CRR3/CRD6: The EU Parliament has now adopted CRR3/CRD6, and the changes came into effect on January 1, 2025. The changes in the capital requirements regulation (CRR3) mainly include:

- A more risk-sensitive standard method for credit risk
- Restrictions in the IRB method: Exceptions for certain types of exposures and minimum levels on risk parameters
- "Basel IV floor" (new capital requirement floor for IRB institutions)
- More robust and risk-sensitive capital requirements for deteriorated creditworthiness of derivative counterparties ("CVA risk")
- New common calculation method for operational risk
- Leverage ratio buffer for globally systemically important banks and adjustments in the exposure measure
- Changed market risk standards ("fundamental review of the trading book", FRTB)

The changes affect SNN's capital requirements, but the effects are manageable.

Capital structure in the savings bank sector: The Savings Bank Committee's report focuses on the capital structure of Norwegian savings banks. The key changes proposed are as follows:

- The committee proposes that the capital structure in savings banks with equity certificates be simplified, and that the distribution of any losses between equity capital and primary capital be changed.
- The approved dividend shall be distributed according to the ownership fraction. The portion of the dividend that accrues to the equity certificate holders shall either be paid out or used for a capital increase (in practice, the issuance of new equity certificates). The portion of the dividend that accrues to the primary capital shall either be paid out as a dividend on the primary capital, given as donations to charitable purposes, or transferred to a foundation with charitable purposes. Additionally, the primary capital's share of the dividend can also be used for a capital increase, thereby increasing the primary capital.
- The committee proposes to remove the ability to pay customer dividends.
- It is proposed to require suitability for board members in savings bank foundations and to clarify and simplify the rules on distributions from savings bank foundations.
- The committee proposes changes to the Financial Institutions Act §20-20 (2), which allows for changing the company's legal organizational form in connection with crisis management.

Credit

Lending regulations: The Government made changes to the lending regulations in December 2024. This includes, among other things, a reduced equity requirement from 15% to 10% for mortgages, and the regulation is made permanent.

IRB area: New EBA guidelines in the IRB area applied as from the start of 2022. Against this background Finanstilsynet published in June 2021 a circular on IRB models. Finance Norway provided two rounds of comments on Finanstilsynet's draft IRB circular. On both occasions the industry, with a basis in the above-mentioned EBA guidelines and applicable EEA rules, made thoroughgoing objections to the circular. Against this background, the Ministry of Finance sent a letter to Finanstilsynet in January 2022 in which the Ministry clarifies the interpretation of Finanstilsynet's circular. The clarification is central to assessing the circular's status. The process regarding the status of the circular is still ongoing.

Debt Information Regulations: Currently only unsecured debt is included in the debt register. In 2022, the Ministry of Children and Families circulated for comment a proposal for amendments to the Debt Information Regulations. The proposal is to incorporate secured debt in the debt information arrangement (the "debt register"). The consultation deadline expired on 14.10.22, but the case still has the status "Under processing".

EBA Guidelines on Default and Recovery: The EBA has updated its guidelines on handling default and recovery (EBA/GL/2015/12) due to changes in the Mortgage Credit Directive. The two key changes are as follows:

- Requirement for the bank to document why the terms offered are appropriate for the customer, taking into account the customer's individual situation.
- If the entire or part of the process of handling defaulted loans is outsourced to another company, which is not itself a credit institution, the bank must ensure that this company complies with the provi-

sions in the EBA's guidelines on default and recovery.

Market risk

EBA-FRTB: In 2024, the EBA conducted a consultation on the proposed technical standard regarding the capital add-on for residual risk in the new market risk method (FRTB). So far, the FRTB framework in CRR has only been for reporting purposes. The introduction of CRR3 will mean that the calculation methodology may also have implications for banks' reported capital adequacy. SNN falls below the thresholds for using one of the two methods in the FRTB framework. It is also not expected that the bank will be affected by the regulatory change in the future, as the bank is significantly below the thresholds in the FRTB framework.

IRRBB: The EU has adopted two regulations that are supplementary rules to the Capital Requirements Directive's provisions on interest rate risk in institutions' activities outside the trading book (Interest Rate Risk in the Banking Book, IRRBB). The supplementary rules specify shock scenarios and common model and parameter assumptions, as well as specify the methodology for calculating IRRBB using both the standard method and the simplified standard method. The Financial Supervisory Authority of Norway (Finanstilsynet) has made changes to the CRR/CRD regulations that implement the regulations into Norwegian law. The regulatory change has no direct consequence for SNN, as the bank uses internal methods for calculating interest rate risk in the banking book.

Counterparty Risk: The Basel Committee has established new guidelines for the management and control of counterparty risk. The new guidelines include recommendations that the Basel Committee believes are crucial for addressing long-standing weaknesses in existing industry practices for managing and controlling counterparty risk. Banks must follow the new Basel guidelines for counterparty risk as soon as they are implemented in national legislation. Although the Basel Committee's recommendations are international standards, they become binding only when incorporated into EU regulations and then into national legislation through the EBA (European Banking Authority) guidelines. The bank will work to close any gaps from current counterparty risk practices against the guidelines in advance of their formal incorporation into EU regulations.

Liquidity and funding

Abolition of General Liquidity Requirements (LCR) in Significant Currency: The Ministry of Finance has made changes to the CRR/CRD regulations that abolish the general rules on liquidity requirements (LCR) in significant currencies. Such liquidity requirements will henceforth be set as Pillar 2 requirements for each institution based on the Financial Supervisory Authority's (Finanstilsynet) SREP assessment. SNN has received prior notice of the establishment of a company-specific liquidity requirement of 50% for LCR in NOK and 100% for LCR in CHF. This was in line with the bank's expectations, and the management has, over time, adapted to this.

ESG

New Rules on Sustainability Reporting: The changes to the Accounting Act came into effect on November 1, 2024. The Ministry of Finance has established transitional rules that gradually introduce requirements for sustainability reporting over the coming years. From the 2024 financial year, the requirements apply to the largest listed companies. The regulatory changes have resulted in new reporting requirements and increased scope for SNN, which is also reflected in the bank's sustainability reporting for 2024.

EBA/GL/2025/01: In January 2024, the EBA published a consultation draft for guidelines on minimum requirements and reference methodology for how institutions should identify and manage sustainability-related risks. In January 2025, the final guidelines were issued. The guidelines will not be applicable until January 11, 2026, but the regulations set clear expectations for the bank's risk approach to ESG. The bank has already started working to ensure compliance with the guidelines.

Other areas

EU's Artificial Intelligence Regulation (AI Act): The AI Act is expected to come into effect in Norway in June 2025, with full implementation two years later. The regulation is designed to ensure the responsible development and use of artificial intelligence. SNN will begin its preparations to adapt to the legislation in 2025.

DORA: The DORA regulation came into effect in the EU on January 17, 2025. The Financial Supervisory Authority of Norway (Finanstilsynet) communicated in a webinar on November 6, 2024, that the expected implementation in Norway will be "by summer." The requirements in DORA are very complex and extensive, placing significant demands on banks' handling of the area. A dedicated DORA implementation project has been established at SNN.

Summary

Overall, the changes in the regulatory area are considered extensive but manageable. It is not expected that the group will need to make significant changes to its business model or strategy in the short or medium term as a result of changes in regulatory conditions.

Summary and future prospects

Financial objectives and ambitions remain unchanged in 2025, and are as follows:

- To deliver a return on equity on a par with the best of comparable financial groups
- A cost ratio below 40%
- A CET1 ratio 1 percentage point above the regulatory minimum
- A dividend payout ratio above 50%

The group's market position and financial position are strong. Over the years, the group has improved its banking operations and delivers results as one of the top banks in the Nordic region.

An expected decline in the policy rate and the economic outlook ahead make 2025 expected to be a more challenging year for the group than 2024. Despite a demanding macroeconomic situation, the group has a good starting point. SpareBank 1 Nord-Norge can capitalize on the foundation that has been laid by continuing a strong focus on customers and costs for the benefit of customers, employees, owners, and society. The ambition is to improve customer satisfaction, increase efficiency, and gain new market shares. This work emphasizes highlighting the group's local approach to customers and market areas.

The annual financial statements for 2024 have been prepared on the assumption of continued operations. The group's long-term strategic plan and profit forecasts for the coming years form the basis for this.

SpareBank 1 Nord-Norge's results for 2024 are described as good, and the group is in a healthy and strong financial position. The economic uncertainty in society remains high, but there is reason for cautious optimism given that the policy rate is expected to be cut during 2025.

The underlying strength of the Northern Norwegian economy remains good, and the bank sees good opportunities for continued growth and positive development for SNN and the region, where SNN, as the most important and largest financial institution, can contribute – for Northern Norway.

The Board of Directors would like to thank the group's entire staff for their efforts and commitment in 2024. This is an important contribution to the development of SpareBank 1 Nord-Norge. The Board would also like to thank the group's customers and business connections for their contributions in 2024.

Statement on corporate governance

Group Management and the Board of Directors conduct an annual review of the corporate governance policies and how they function in the Group. SpareBank 1 Nord-Norge issues a statement on the policies and practice of corporate governance in accordance with section 3-3b of the Accounting Act and the Norwegian Code of Practice for Corporate Governance of 14.10.21.

The following explains how section 3-3b(2) of the Accounting Act is complied with at SpareBank 1 Nord-Norge. The numbering shows the numbering of the point concerned.

1. **Reference to the Code of Practice followed by SpareBank 1 Nord-Norge, information about where the Code of Practice is available, and the reasons for any deviations from the Code of Practice.**

SpareBank 1 Nord-Norge's corporate governance structure is based on regulatory requirements and government expectations. SpareBank 1 Nord-Norge complies with the Norwegian Code of Practice for Corporate Governance issued by the Norwegian Corporate Governance Board (NUES).

2. **Information about where the Code of Practice and regulations mentioned in no. 1 are publicly available.**

The Code of Practice for Corporate Governance is available at nues.no.

3. **Reasons for any deviations from the Code of Practice and regulations as mentioned in no 1.**

Any deviations from the Code of Practice are commented on under the following statement on compliance with the Code of Practice.

4. **Description of the main elements of SpareBank 1 Nord-Norge's systems for internal control and risk management associated with the financial reporting process.**

See point 10 in the following statement on compliance with the Norwegian Code of Practice for Corporate Governance for a description of the internal control and risk management associated with the financial reporting process.

5. **Provisions of the articles of association which in whole or in part expand or diverge from chapter 5 of the Public Limited Liability Companies Act.**

SpareBank 1 Nord-Norge complies with the Financial Institutions Act. See point 6 in the following statement on compliance with the Norwegian Code of Practice for Corporate Governance for a description of SpareBank 1 Nord-Norge's compliance.

6. **The composition of governing bodies and a description of the main elements of the applicable instructions and guidelines for the work of these bodies and any committees.**

See points 6, 7, 8, and 9 in the following statement on compliance with the Norwegian Code of Practice for Corporate Governance.

7. **Provisions of the articles of association which regulate the appointment and replacement of board members.**

See point 8 in the following statement.

8. **Provisions of the articles of association and authorisations which empower the Board of Directors to decide to repurchase or issue the Bank's treasury equity certificates (ECs).**

See point 3 in the following statement on compliance with the Norwegian Code of Practice for Corporate Governance.

9. **Description of the institution's policy on equality and diversity with regard to, for example, age, gender and educational and occupational background for the composition of the Board of Directors, management and control bodies and their subcommittees, if any. The object of the policy, how it has been implemented and its effect in the reporting period shall be stated.**

See our «Guidelines for our employees» which are publicly available in the sustainability library on our website. For the Board of Directors and subcommittees, see point 8 in the following statement on compliance with the Norwegian Code of Practice for Corporate Governance.

The Norwegian Code of Practice for Corporate Governance

SpareBank 1 Nord-Norge complies with the Norwegian Code of Practice for Corporate Governance issued by the Norwegian Corporate Governance Board (NUES). The following pages describe SpareBank 1 Nord-Norge's compliance with the Code of Practice.

POINT 1 OF THE CODE OF PRACTICE:

Statement on corporate governance at SpareBank 1 Nord-Norge

There are no significant deviations between the Code of Practice and compliance with the Code of Practice at SpareBank 1 Nord-Norge.

The Code of Practice applies to the extent appropriate for savings banks with equity certificates (Ecs). Any deviations are explained below.

Corporate governance at SpareBank 1 Nord-Norge is defined as the goals and overarching policies by which the Bank is governed and controlled for the purpose of safeguarding the interests of EC holders, depositors and other stakeholder groups in the Bank. Accordingly, the Bank's corporate governance policies are designed to ensure sound asset management and provide added assurance that its stated goals and strategies will be realised and achieved.

The Bank complies with the Norwegian Code of Practice for Corporate Governance. Based on three main pillars – openness, predictability and transparency – the Bank has defined the following main policies:

- A structure which ensures targeted and independent management and control.
- Systems that ensure measurability and accountability.
- Effective risk management.
- Full disclosure and effective communication to underpin the trust between EC holders, the Board of Directors and Group Management.
- Equal treatment of all EC holders and a balanced relationship with other stakeholder groups.
- Compliance with regulatory requirements and ethical standards.

Deviations from point 1 of the Code of Practice: None

POINT 2 OF THE CODE OF PRACTICE:

Business

SpareBank 1 Nord-Norge is an independent financial services group within the SpareBank 1 Alliance.

The Bank's stated purpose is: «*The object of the savings bank is to provide those services that are customary or natural for banks to perform under the legislation governing savings banks and the licences granted at any time.*»

The Bank's corporate vision is «For Northern Norway!» On SNN's website, you can find more information about the bank's vision, business idea, and strategic and financial goals. The board adopts clear goals, strategies, and risk profiles for the business. This is to ensure that the bank creates value for its owners in a sustainable manner. The board takes into account economic, social, and environmental factors (ESG).

The Bank's corporate governance rules were last approved by the Board of Directors on 12.02.25. SpareBank 1 Nord-Norge's staff must be known for their high ethical standards. This means that they must conduct themselves in a manner that is honest, trustworthy and inspires confidence, and comply with the standards, regulations and laws by which society is governed. Therefore, the Bank has produced an ethics handbook entitled «SNN Code of Conduct – Ethical Guidelines» This addresses topics such as conflicts of interest, relationships with customers, suppliers and competitors, securities trading, insider rules and relevant private financial matters. The rules apply to all employees and elected officers on governing bodies.

The institution's code of conduct is available on the institution's website.

All employees and elected officers are required by law and internal policies to treat knowledge of the Group's or a customer's circumstances to which they become privy through their work as confidential. This duty of confidentiality applies not only in respect of third parties but also with respect to colleagues who have no need for the information in question in their work. No employee may, via computer systems or by any other means, actively seek information about other colleagues or customers that is not required for their work. SpareBank 1 Nord-Norge has its own whistleblowing procedure for employees who learn of circumstances that contravene applicable laws and regulations or of material breaches of internal rules. Employees who in accordance with internal procedures report wrongdoing must not be subjected to any reprisals due to their reporting. Employees can report anonymously and to an external whistleblowing channel. External parties can report wrongdoing.

SpareBank 1 Nord-Norge's corporate social responsibility is an integral part of the business and covers economic, social, and environmental considerations. It also covers our social mission as a savings bank with a substantial social responsibility for value creation and development of the region. We fulfil this through our services as a financial group and our distribution of community dividends and our wider social commitment. Corporate social responsibility is also expressed in the way in which we manage the resources at our disposal and in our dialogue with employees, EC holders, customers, suppliers, local communities and other stakeholders. The institution has dedicated webpages for sustainability and corporate social responsibility. See also the chapter entitled «Sustainability and corporate social responsibility».

The Board of Directors evaluates objectives, strategies and risk profiles at least once a year.

Deviations from point 2 of the Code of Practice:
None

POINT 3 OF THE CODE OF PRACTICE:

Equity and dividends

The Board of Directors continuously assesses the Group's capital level and composition in light of its objectives, strategy and desired risk profile. As at 31.12.24, the SpareBank 1 Nord-Norge Group's Common Equity Tier 1 (CET1) capital ratio was 16.8 per cent. The Bank and the Group are viewed as financially very sound.

The Bank's financial targets, including its financial strength target, are communicated via the Bank's website, in periodic presentations of its accounts and in the Bank's annual report (see also the previous point). The Bank also conducts periodic reviews of the Bank's risk exposure and need for capital. These are summarised in a yearly report (ICAAP) which is submitted to and approved by the Bank's Board of Directors.

For further information about equity, see point 10 in this statement on compliance with the Norwegian Code of Practice for Corporate Governance.

Dividends

The Board of Directors has formulated a dividend policy as a basis for the distribution of dividends proposed to the Supervisory Board. The dividend policy was last updated in December 2024 and is published on the Bank's website, in periodic presentations of the accounts and in the annual report. Each year the Supervisory Board determines the share of post-tax profit to be distributed as dividends to EC holders and primary capital based on their respective shares of total equity. The share allocated to primary capital is normally paid as a community dividends. For further information, see the Annual Report from the Board.

Purchase of treasury ECs

To permit flexibility when selling ECs to employees and elected officers, the Supervisory Board has previously authorised the Board of Directors to buy back or issue treasury ECs. To this end, the Board of Directors was on 14.03.24 granted authorisation by the Supervisory Board to purchase and establish a security interest in the Bank's treasury ECs within the framework set by regulatory requirements. The total volume of ECs held by the Bank, and/or in which it has a consensual security interest, may not exceed 5 per cent of the Bank's EC holders' capital. The lowest price payable per EC is NOK 12.50 and the highest is NOK 200. The ECs must be purchased on the securities market via the Oslo Stock Exchange. Disposal shall take place in the same market, or as placements with employees and elected officers in accordance with regulatory requirements. Granting of a security interest is done by agreement with the customer in conjunction with the credit process, and any realisation of the security interest must take place on the securities market via the Oslo Stock Exchange. The authorisation is valid until 14.05.25.

Deficits

Any deficits are covered by proportionate transfers from primary capital, including the donations fund and EC holders' capital that exceeds the stipulated EC holders' capital, including the dividend equalisation fund. Deficits that are not covered like this are covered by proportional transfers from the premium reserve and compensation reserve, and thereafter by reducing the stipulated EC holders' capital.

Capital increases

Board authorisations for capital increases are granted on the basis of concrete, defined purposes. As at 31.12.24, the Board of Directors has granted no authorisations to increase the capital of SpareBank 1 Nord-Norge beyond the authority to issue hybrid Tier 1 instruments, subordinated loans and subordinated debt instruments. No equity issues were implemented in 2024.

Deviations from point 3 of the Code of Practice:
None

POINT 4 OF THE CODE OF PRACTICE:

Equal treatment of shareholders

The Bank must, through ongoing dialogue, ensure that EC holders and other stakeholder groups have opportunities to express their views on the Bank's strategic and business-related development. The Bank must have a profile that ensures credibility and predictability in the equity capital market. The emphasis in the articles of association and the work of the Board of Directors and Group Management is on ensuring that all EC holders are treated equally and have the same opportunities to exercise influence. All ECs confer equal voting rights. The Bank complies with the Financial Institutions Act's rules on holdings and voting rights insofar as these apply to EC-based savings banks.

In the event of an increase in EC holders' capital, existing EC holders have pre-emptive rights, unless special circumstances call for deviation from this rule Any such deviation will be explained.

SpareBank 1 Nord-Norge has for several years conducted sales of ECs and/or private placings with employees involving discounts and lock-in periods. Such transactions are conducted to strengthen the employees' ownership of their place of work, interest in the Bank's profitability and future, and the Bank's equity instrument.

In 2024, employees were invited to purchase ECs via savings agreements for NOK 500, NOK 1 000, NOK 1 500, NOK 2 000, NOK 2 500 or NOK 3 000 per month. The maximum amount per year is thus NOK 36 000, which is deducted from their pay. Each quarter, ECs are purchased for the amount saved. Every second EC purchased by the employee via the savings scheme qualifies them for one further EC free of charge from SpareBank 1 Nord-Norge.

The «bonus ECs» are awarded 2 years after the employee starts saving and are contingent on the employee retaining ownership of the originally saved ECs and remaining an employee of the Group.

A total of 682 employees availed themselves of the offer in 2024. The average amount saved was about NOK 2 300 per month.

Deviations from point 4 of the Code of Practice:
None

POINT 5 OF THE CODE OF PRACTICE:

Shares and negotiability

The Bank's EC is listed on the Oslo Stock Exchange and is freely negotiable. The articles of association contain restrictions on negotiability.

Deviations from point 5 of the Code of Practice:
None

POINT 6 OF THE CODE OF PRACTICE:

General Assembly (Representantskapet)

The Bank is a savings bank, and its management structure and composition of management bodies differ from those of a private limited company, cf. chapter 8 of the Financial Institutions Act on general meetings, governing and control bodies, etc. SpareBank 1 Nord-Norge accordingly has a general meeting «Supervisory Board»).

The Bank's supreme body, the Supervisory Board, comprises EC holders, depositors, employees and representatives of the public authorities. The elected members shall collectively reflect the savings bank's customer structure and other stakeholder groups and its societal functions.

The Supervisory Board shall see to it that the Bank operates in line with its mission and in conformity with the law, its articles of association and the decisions of the Supervisory Board. The Supervisory Board has the following main tasks:

- Overseeing the Board of Directors' management of the institution.
- Approving the annual financial statements and management report.
- Electing members of the Bank's Board of Directors and nomination committee.
- Appointing the Bank's responsible auditor and fixing the auditor's remuneration.
- Distributing the amount which, according to section 10-17 of the Financial Institutions Act, may be donated to non-profit causes.
- Issuing hybrid Tier 1 instruments, subordinated loans and subordinated debt instruments.

The Bank shall ensure that all members of the Supervisory Board receive at least 21 days' notice in writing of Supervisory Board meetings and access to agenda documents, including the nomination committee's recommendations. The documents shall be available on the Bank's website at least 21 days in advance of such meetings. The Supervisory Board cannot make decisions on any matters other than those stated in the notice of the meeting.

The Supervisory Board consists of 40 members and 20 substitute members with the following representation:

- EC holders: 16 members and 6 substitute members
- Depositors: 10 members and 5 substitute members
- Employees: 10 members and 5 substitute members
- Troms County Council: 1 member and 1 substitute member
- Finnmark County Council: 1 member and 1 substitute member
- Nordland County Council: 2 members and 2 substitute members

The Supervisory Board normally meets once a year.

The Supervisory Board has substitute members. EC holders can accordingly not attend by proxy.

Deviations from point 6 of the Code of Practice:
The Supervisory Board consists of 40 members, with EC holders accounting for 16 out of 40 votes. The reason for this deviation from the Code is that Spare-Bank 1 Nord-Norge complies with the provisions of the Financial Institutions Act with respect to the composition of corporate bodies of savings banks. All EC holders can accordingly not participate in Supervisory Board meetings.

POINT 7 OF THE CODE OF PRACTICE:

Nomination committee

Nomination committee for the Supervisory Board

The nomination committee comprises five members and five substitute members, with representatives from all four groups represented on the Supervisory Board. The nomination committee is appointed by the Supervisory Board to prepare the election of members to the Supervisory Board, the Board of Directors and the nomination committee itself, excluding the employee representatives. The nomination committee is also tasked with reviewing and proposing any changes in the fee structure for the institution's elected officers.

Guidelines for the nomination committee are established by the Bank's Supervisory Board. The nomination committee comprises 5 members and 5 substitute members with the following composition:

- 2 members and 2 substitute members from those elected by the EC holders
- 1 member and 1 substitute member from those elected by the depositors
- 1 member and 1 substitute member from those elected by the employees
- 1 member and 1 substitute member from those elected by the county councils

When preparing the various elections, the committee attaches importance to experience, expertise, gender, industry, and geography.

Depositors' elections

The Supervisory Board's nomination committee shall prepare the depositors' election of members and substitute members to the Supervisory Board. The actual election is conducted electronically by the depositors.

County council members' elections

Representatives from the county councils are appointed by the county councils themselves.

EC holders' elections

An annual election meeting is held for the EC holders at which representatives to the Supervisory Board are elected and the institution's financial situation is presented. The EC holders are invited to the election meeting at least 14 days before the meeting is held. Notice of the meeting includes the nomination committee's recommendations for representatives to the Supervisory Board and other relevant supporting documents.

The voting rights attached to ECs are held by the person provably registered with the Norwegian central securities depository (VPS). The chair of the nomination committee, or whoever he/she authorises, presents the recommendations to the election meeting, including an account of the nomination committee's work. All those entitled to vote may submit proposals to the election meeting. Separate elections shall be held for members and substitute members. The order in which the substitute members are elected shall be determined at the election.

Votes shall be cast in writing unless all attendees at the meeting agree on a different method. The people who receive the most votes shall be elected. In the case of a tied vote, lots shall be drawn.

Nomination committee for the employees' election

Pursuant to the Financial Institutions Act, the election must be organised by a nomination committee. The nomination committee must comprise at least three members and both the employees and management must be represented.

Deviations from point 7 of the Code of Practice:
All members of the nomination committee for the Supervisory Board are elected from the groups represented on the Supervisory Board. This is consistent with the Financial Institutions Act's rules regulating savings banks.

POINT 8 OF THE CODE OF PRACTICE:

Supervisory Board and Board of Directors: Composition and independence

Please refer to point 6 for information about general meetings («Supervisory Board»).

In 2024, the Board of Directors comprised nine regularly attending members, seven of whom were elected by the Supervisory Board and two were elected by the employees. Four of the Board of Directors' nine members were women, three of whom were elected by the Supervisory Board and one by the employees. The nine members are elected for a term of 2 years.

An insurance policy has been taken out for the board members and the Group CEO to cover any liability arising on their part towards the Bank and third parties. The policy covers the insureds' liability for any economic loss, including personal liability for the Bank's debts, that is the subject of a claim brought against the insured person in the insured period as the result of an alleged tortious act or omission.

The CEO is not a member of the Board of Directors. None of the board members elected by the Supervisory Board have any employee or contractor relationship with the Group beyond their positions as elected officers. The board members' independence has been assessed by the nomination committee and they are deemed to be independent. However, employee-elected board members are not subject to such an assessment. They are elected by and from among the employees.

The chair and deputy chair are elected by the Supervisory Board at separate elections for a term of 2 years. The composition of the Board of Directors follows from the articles of association. The nomination committee shall ensure that the composition of the Board of Directors is such that the qualifications of its members fulfil the provisions of the Financial Institutions Act on suitability and also satisfy ESMA/EBA recommendations.

The instructions for the nomination committee require the following:

- Competence – importance shall be given both to formal training and experience.
- Industry – a variety of industries shall be represented.
- Geography – the Bank's entire market area should be represented.
- Gender – the provisions of the Public Limited Liability Companies Act concerning representation of both genders apply to the Board of Directors. For other elected officers, including within each of the various groupings in the Supervisory Board, efforts should be made to ensure a gender distribution that is as equal as possible.
- Impartiality – obvious conflicts of interest should be avoided. Board members cannot hold board positions in other financial institutions: see the Financial Institutions Act, section 9-1.
- Length of service – the need for continuity must be weighed against the need for renewal and independence: see the recommendations in the Code of Practice.

The Board of Directors has 11 fixed meetings per year, and the members' attendance at board meetings is described in the annual report. Their holdings of SpareBank 1 Nord-Norge ECs are disclosed in the notes to the accounts, under the presentation of the Board of Directors in the annual report and on the Bank's website. Each board member's background is also described on the Bank's website, www.snn.no.

Deviations from point 8 of the Code of Practice:
None

POINT 9 OF THE CODE OF PRACTICE:

The work of the Board of Directors

The Board of Directors manages the Bank's operations in accordance with regulatory requirements, the articles of association and other guidelines issued by the Supervisory Board. The Board of Directors is responsible for ensuring that the resources at the disposal of the Bank are managed in a prudent and appropriate manner. The Board also has an obligation to ensure that all accounting and asset management are subject to satisfactory controls. For a more detailed description of the Board's control functions, see point 10 of the Code of Practice.

In addition, the Board has the following main responsibilities:

- To appoint the CEO.
- To establish instructions for the day-to-day management of the Bank.
- To determine the Bank's financial and strategic goals, budget and market-related and organisational goals.

The Board of Directors appoints and dismisses the manager of the internal audit function.

The Board of Directors normally holds 11 meetings a year. In 2024, the Board met 12 times.

SIGNIFICANT INTERESTS

The instructions to the Board of Directors provide that a board member may not participate in the consideration of or decision in matters of significance for him or her or for any related party. Board members shall disclose, unsolicited, any interest the individual senior employee or a related party may have in the decision in a matter under consideration by the Board of Directors. This applies regardless of whether it can be regarded as a vested interest that disqualifies them under the previous point.

Unless the board member himself/herself opts to withdraw from consideration of the matter, the Board shall determine whether not the person concerned shall withdraw. In such an assessment, weight shall be given to any and all forms of personal, financial or other interests of the member and to the need for public trust in the Board of Directors' decisions and the Bank's activities. The Board of Directors' assessment of the question of disqualification shall be recorded in the minutes.

The board instructions specify how the board and the executive management should handle agreements with related parties, as well as provisions for obtaining an independent valuation. Currently, there are no such agreements with related parties.

Board members are defined as primary insiders and must adhere to the bank's regulations for acquiring equity certificates in the bank and banks in the SpareBank 1 alliance.

When dealing with engagements in which a board member has a position or interest, the individual must declare themselves disqualified and leave the meeting. Board members and senior executives must also notify the board if they directly or indirectly have a significant interest in an agreement entered into by the bank. The bank has introduced a separate register of disqualifications, and other board positions are registered. Board members are also covered by this.

EVALUATION OF THE BOARD OF DIRECTORS

Each year the Board of Directors conducts a self-evaluation of its work with regard to competence, working methods, administrative procedures, meeting structure and prioritising of tasks. The evaluation is submitted to the nomination committee as a tool in the recruitment of new board members.

REMUNERATION COMMITTEE

Members:

- Chairman of the Board and three board members, one of whom represents the employees.
- The HR manager performs the secretary function.

The remuneration committee is identical for all institutions in the Group that are covered by the Financial Institutions Regulations. In 2024, the committee consisted of three men and one woman.

Mandate:

To prepare and present matters to the Board of Directors concerning the remuneration arrangements, including:

- Regulatory requirements for remuneration
- Remuneration policy
- Report on the implementation of remuneration arrangements
- Statement on the determination of salaries and other remuneration of senior employees that is presented to the Supervisory Board, as well as a report on compliance with the guidelines
- The remuneration committee considers, and makes recommendations on, the variable remuneration of senior personnel covered by the Financial Institutions Act
- Variable remuneration framework
- Group CEO's remuneration

AUDIT COMMITTEE

The audit committee is a preparatory and advisory working committee for the Board of Directors tasked with carrying out in-depth assessments of selected areas.

Members:

The audit committee shall comprise three members of the Board of Directors. They shall be independent pursuant to the definition in the Code of Practice for Corporate Governance.

The audit committee may not consist of members of any other board committee, with the following exceptions/clarifications:

- Members of the audit committee may be members of the risk committee.
- Members of the audit committee may be members of the appointments committee and other ad hoc committees.
- The chair of the audit committee cannot be the chair of the risk committee or the nomination committee.

The audit committee must at all times have the necessary competence to discharge its tasks. At least one member of the audit committee must have relevant accounting and auditing skills and experience.

The audit committee meets as often as the committee itself deems necessary, but at least four times a year. In 2024, the committee comprised two men and one woman.

Mandate:

The audit committee shall oversee that the Group has an independent and effective external auditor and satisfactory financial reporting in conformity with regulatory requirements. This shall include the audit committee reviewing the following areas, processes and documents (and all matters naturally pertaining thereto):

Annually:

- Annual report, including relevant attachments.
- External auditor's audit plan.
- External auditor's summary report following the carrying out of the statutory audit, including the audit report.
- External auditor's declaration of independence.
- Consider, and submit to the Board of Directors a recommendation on, the external auditor's remuneration.
- Sustainability reporting (ESG):
  - Monitor the Group's sustainability reporting and related processes to identify the information reported in line with relevant sustainability standards.
  - Ensure that the sustainability reporting does not contain greenwashing.
- Review internal control, risk management and internal audit systems for financial reporting and sustainability reporting (ESG).

Quarterly:

- Quarterly report, including relevant attachments (loss report, etc.).

Ongoing (general):

- Review and discuss points where the auditor disagrees with the management and/or where substantial uncertainty has been drawn attention to by the auditor and/or other matters which the auditor wishes to discuss.
- Correspondence with the Financial Supervisory Authority of Norway (Finanstilsynet) relating to areas covered by the audit committee.
- Assess other matters as determined by the Board of Directors and/or the audit committee itself, or which the external auditor wishes to discuss, including letters to Group Management (Management Letters).

Ongoing (under the identically worded Financial Institutions Act's section 8-19 and the Auditors Act's section 6-43):

- Inform the Board of Directors of the outcome of the statutory audit and explain how the audit contributed to integrity in the financial reporting, and the audit committee's role in that process.
- Prepare the Board of Directors' follow-up of the financial reporting process and offer

recommendations or proposals to assure its integrity.
- Insofar as the institution's financial reporting is concerned, monitor the systems for internal control, risk management and the institution's internal audit without thereby impinging on the audit committee's independent role.
- Maintain ongoing contact with the institution's elected auditor regarding the auditing of the annual financial statements, including in particular monitoring the conduct of the audit in light of matters to which Finanstilsynet has drawn attention under article 26(6) of the Audit Regulation, ref. section 12-1 of the Auditors Act.
- Evaluate and monitor the auditor's independence under chapter 8 of the Auditors Act and article 6 of the Audit Regulation, in particular that non-audit services are delivered in conformity with article 5 of the Audit Regulation, ref. section 12-1 of the Auditors Act. See also separate authorisation to the administration related to "purchase of non-audit services from the external auditor".
- Be responsible for preparing the institution's appointment of the auditor and make its recommendation in conformity with article 16 of the Audit Regulation, ref. section 12-1 of the Auditors Act.

RISK COMMITTEE

The risk committee is a preparatory and advisory working committee for the Board of Directors tasked with carrying out in-depth assessments of selected areas.

Members:

The risk committee shall comprise three members from the Board of Directors. They shall be independent pursuant to the definition in the Code of Practice for Corporate Governance.

The risk committee may not consist of members of any other board committee, with the following exceptions/clarifications:
- The members of the risk committee may be members of the audit committee.
- The members of the risk committee may be members of the appointments committee and other ad hoc committees.
- The chair of the risk committee may not also chair the audit committee or the appointments committee.

The risk committee must at any and all times have the competence needed to discharge the risk committee's tasks. When appointing the committee members, importance shall be attached to the members' possession, individually or collectively, of sufficient competence, experience and expertise in risk and capital management.

The risk committee meets as often as the committee itself finds necessary, but at least four times a year. In 2024, the committee comprised two women and one man.

Mandate:

The risk committee shall oversee that risk and capital management in the Group supports the Group's strategic development and goal attainment and ensures financial stability and prudent asset management. This shall include the risk committee reviewing the following areas, processes and documents (and all matters naturally pertaining thereto):

Annually:
- Self-assessment of risk and capital requirements (ICAAP)
- Validation of the IRB system
- Risk strategy
- Governing documents in the credit area
- Governing documents in the capital market area
- Governing Documents in the ESG Area
- Governing documents in the ICT area
- Governing documents in the AML area
- Other relevant governing documents in the various risk areas
- Recovery plan
- Bail-in playbook
- Pillar 3 report
- Manager verification
- Governing documents in the AML area
- Annual plan for the internal audit function
- Incentives in the remuneration policy and remuneration practice (from a risk perspective).

Quarterly/four-monthly:
- Risk report from Risk Management
- Compliance report from Compliance
- First-line reporting on AML, GDPR, ICT and HR
- Status reports from the internal audit function

Ongoing:
- New strategic initiatives.
- Correspondence with Finanstilsynet related to areas that the risk committee must consider.
- Changes to the IRB system (model changes, etc.).

- Significant new products, processes and systems, outsourcing arrangements, etc.
- Risk pricing.
- Ensuring that the IRB system is well integrated into the organisation and that it satisfactorily calculates risk levels and capital requirements.
- Ensuring that the Bank has adequate systems for internal control, risk management, compliance and the internal audit function, and that they that function satisfactorily.
- Assessing other matters as determined by the Board of Directors and/or the risk committee itself, or that the internal auditor wishes to discuss.

Periodically:
- Assessing and making recommendations to the Board of Directors concerning the election of the internal auditor.
- Instructions to the internal audit function.
- Instructions to the chief risk officer (CRO).
- Instructions to the head of Compliance.

REPORTING

The Board of Directors receives periodic reports on the following:
- Financial performance
- Market developments
- Management, personnel and organisational development
- Changes in the risk picture and risk exposure for the Bank, including the status with respect to risk limits and targets adopted by the Board, and the status with respect to recovery indicators etc.
- Compliance

In addition to the above, there are periodic presentations of the Bank's scorecard, which contains financial, organisational, market-related and quality-related targets.

Central business lines and other related areas are reviewed at least once a year with the evaluation and determination of limits and guidelines.

Deviations from point 9 of the Code of Practice: None.

POINT 10 OF THE CODE OF PRACTICE:

Risk management and internal control

RISK MANAGEMENT FUNCTION

The function is independent of the business, and the department has overall responsibility for comprehensive risk management and internal control, including responsibility for the group's risk models and the further development of effective risk management systems, etc.

There is a job description for the function's leader (CRO). This is revised and approved by the board annually.

COMPLIANCE FUNCTION

The compliance function is independent of the business and is responsible for monitoring compliance with regulatory requirements and internal guidelines within the group. The head of Compliance has a direct reporting line to the Board of Directors.

The head of compliance is responsible for:

- The compliance function should have a risk-based approach to control tasks, and a compliance plan should be prepared to form the basis for controls and preventive work. Control actions should be documented, and incidents and deviations should be recorded.
- Monitor and ensure that the group complies with the applicable external and internal regulations at all times, and ensure that measures taken to address non-compliance are sufficient.
- Fulfill the role of compliance officer in accordance with the Anti-Money Laundering Act § 35 (2).
- Fulfill the role of compliance officer for the securities company.
- Facilitate effective identification of risks for non-compliance with relevant external requirements, and provide advice on risk-reducing measures.
- Keep the CEO continuously informed about the development and operation of their area of responsibility.
- Further develop the framework for managing relevant compliance risks in the group in line with the adopted risk strategy.
- Preventive work against, and ongoing control of, money laundering and terrorist financing.
- Independent management and board reporting of compliance risk in the group.
- Provide training, guidance, and advice.
- Monitor and follow up on the effectiveness of control measures.
- The head of Compliance should be presented with strategies and business plans and specifically participate in assessments if the company expands its business areas or launches new products. Before decisions are made to use new or significantly changed products, services, processes, or channels in the group, the head of Compliance should present an assessment that compliance is sufficiently ensured.
- Provide the group with advice and guidance on acceptable behavior and practices in relation to the interpretation of external and internal regulations.
- The compliance function in the securities firm is managed by the group's compliance department.
- There is a job description for the head of compliance. The job description is revised and approved by the board annually. It includes the compliance responsibility for the securities firm.

INTERNAL AUDIT

The internal auditor is a tool for the board and administration to monitor that the risk management process is targeted, effective, and functioning as intended. EY provides internal audit services for the group. The internal audit covers the entire business, including significant outsourced activities and subsidiaries subject to regulations on risk management and internal control, or those with activities considered significant for the group. The main task of the internal audit is to confirm that the established internal control functions as intended and to ensure that the established risk management measures are sufficient in relation to the bank's risk profile.

The internal audit reports quarterly to the board, which approves annual plans and budgets for the internal audit. The audit reports and their recommendations for improvements in the bank's risk management are continuously reviewed and implemented.

An audit plan is prepared, discussed with the group management, reviewed by the risk committee, and approved by the board. The internal audit's risk assessments form the basis for which areas are to be reviewed.

Special audit reports are prepared, with results and suggestions for improvement measures, which are presented to the responsible manager and the

group's management. A summary of the reports is sent quarterly to the risk committee and the board. Any consulting assignments are carried out in accordance with the standards and recommendations applicable to internal auditors (IIA/NIRF).

Next follows the Strategic principles for risk and capital management, which are already included in this section.

STRATEGIC PRINCIPLES FOR RISK AND CAPITAL MANAGEMENT

Risk and capital management at SpareBank 1 Nord-Norge shall support the group's strategic development and goal achievement, while ensuring financial stability and prudent asset management. This shall be achieved through the strategic principles:

Insight

- Good understanding of the group's risk exposure.
- Strong risk culture characterized by high awareness of risk management and internal control.

Quality

- Comprehensive risk management that ensures efficient operations and prudent handling of significant risks.
- Differentiated risk management that ensures the right quality in processes and systems.

Customer-Oriented

Understand how different customer activities drive risk in the business.

- Balance the relationship between risk and business in a good way.

Carbon Footprint

- SpareBank 1 Nord-Norge shall not offer products and/or services, or perform actions that involve significant risk of environmental damage.

RISK WILLINGNESS

The risk strategy is the key document for risk and capital management in the Group. The risk strategy defines the risk that the Group is willing to accept (risk willingness) in order to attain the Group's business-related goals as they are defined in the business strategy.

Risk willingness is defined both qualitatively and quantitatively, for both a normal scenario and a stress scenario. The Group's qualitative risk willingness is presented in the table below.

	RISK WILLINGNESS 2024	
RISK AREA	NORMAL SCENARIO	STRESS SCENARIO
Business risk	Low	
Financial strength	Low	
Credit risk	Moderate	Low to moderate
Market risk	Low to moderate	
Liquidity and funding risk	Low	
Owner risk	Moderate	
Operational risk	Low to moderate	
Compliance risk	Low	
ESG risk	Low to moderate	
Systemic risk	Externally given	
Total risk willingness	**Low to moderate**	

The overall risk willingness is low to moderate, unchanged from previous years. The qualitatively defined risk willingness is operationalised through quantitative risk limits and targets within each of the risk areas. The scenario in accordance with which the Group will be managed at any time is decided by the Board of Directors. Throughout 2023, the Group's risk willingness was defined on the basis of a normal scenario. Scenario assessments are conducted on an ongoing basis.

It is a key principle is that the Group's risk exposure should at all times be within the scope of the Group's risk willingness and risk capacity. The Group's risk exposure in terms of financial risks was largely in line with the risk willingness adopted by the Board throughout 2023. For further information, see the Group's annual financial statements and Pillar 3 report.

FRAMEWORK FOR RISK MANAGEMENT AND INTERNAL CONTROL

COSO framework

Through its ongoing activities, the Group is exposed to various types of risks that can hinder goal attainment. The Group accordingly has in place processes and systems for risk management and internal control with a view to ensuring long-term value creation through efficient operations and the proper management of the risks to which the Group is exposed.

The strategic principles for risk and capital management provide the basis for management and control, both of individual risks and the Group's overall risk exposure. The Group's framework for risk management and internal control is based on the framework of the Committee of Sponsoring Organisations of the Treadway Commission (COSO), where the following five elements are viewed as central to achieving an effective and integrated internal control system:

- **Control environment:** includes the people in the institution, their individual qualities and integrity, ethical values, attitudes and competencies, as well as how the business is organised. At SpareBank 1 Nord-Norge, risk management and internal control are organised according to the three-line model (3LOD), described below.
- **Risk assessment:** identification and assessment of internal and external factors that affect the Group's goal attainment.
- **Control activities:** policies and procedures to ensure that identified risks are mitigated and managed effectively.
- **Information and communication:** processes that ensure that relevant information is identified and communicated in a timely manner.
- **Monitoring:** processes to ensure that internal control is appropriately defined and implemented, and that it is effective and adaptable.

At SpareBank 1 Nord-Norge, the principles for internal control in the COSO framework are operationalised through the Group's code of conduct and other governing documents, including the policy for risk management and internal control.

Policy for risk management and internal control

A policy for risk management and internal control has been adopted by the Board of Directors, and defines:

- Principles of risk management and internal control
- Organisation and responsibility structure
- Documentation and reporting

These main elements are further described below.

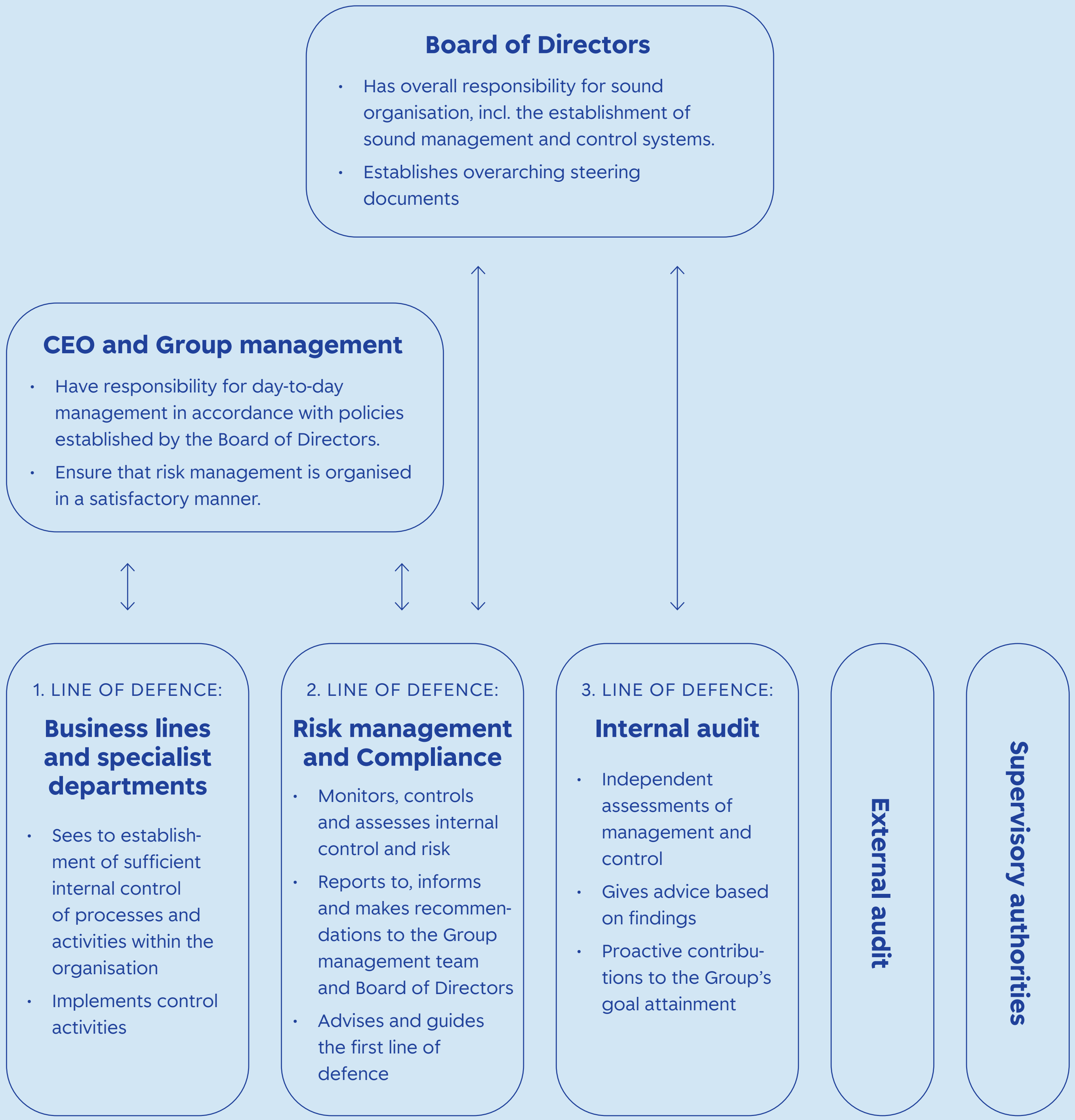
Principles of risk management and internal control

The Group's work on risk management and internal control is performed in keeping with the following principles:

- Organisation: risk management and internal control shall be organised in accordance with the principle of three lines of defence.
- Comprehensive: risk management and internal control shall be comprehensive, long-term and balanced, and an integral part of the Group's governance.
- Insight: risk management and internal control shall be based on insight.
- Consistent: risk management and internal control shall be tailored to the risk willingness in the area concerned.
- Quality: risk management and internal control shall be of the right quality and be subject to continuous improvement and development.
- Operationalisation: Risk management and internal control shall be further operationalized through:
  - Governing Documents
  - System Support
  - Responsibility Matrices according to the HUKI methodology
  - Periodic Risk Assessments of Processes
  - Risk Assessments for New Products, Systems, and Initiatives (NPAP)

Organisation and responsibility structure

The Group's organisational set-up aims to underpin, and be in keeping with, regulatory requirements and internal aspirations with regard to risk management and internal control. At SpareBank 1 Nord-Norge, risk management and internal control are organised in line with the three-line model (3LOD) as illustrated and described below.



The entire business is viewed as a part of the control environment. All parts of the business have a responsibility for assessing significant risks related to their own business line, for establishing control measures to mitigate risk, and for measuring, evaluating and reporting the status of risk management and internal control within their area of responsibility and in relation to their role in the three-line model. This entails the following: The Board of Directors of SpareBank 1 Nord-Norge is responsible for adopting a prudent risk profile, yield targets, overall risk and capital management framework, including the IRB system, and risk models in general. The Board of Directors is also responsible for adopting risk frameworks and authorisations, and for initiating, assessing and approving the internal process for assessing risk exposure and capital requirements (ICAAP) and the associated capital planning.

The Board of Directors shall ensure that the framework is adequately communicated and implemented throughout the Group. The Board of Directors shall also ensure that the framework is followed up with sufficient authority and resources. The Board of Directors' tasks are formalised in a specific annual plan, which is updated each year. This ensures that the Board of Directors can devote sufficient time and focus to key tasks. For further information, see point 9 of the Code of Practice.

The Group CEO is responsible for overall risk management. The Group CEO is accordingly responsible for implementing effective risk management systems in the Group and for monitoring risk exposure. The Group CEO is also responsible for delegating authorisations and reporting to the Board of Directors.

Managers of business lines and specialist departments, as well as employees, are responsible for day-to-day risk management within their areas of responsibility. The managers shall at all times ensure that risk management and risk exposure comply with the limits and governance principles determined by the Board of Directors or Group CEO.

Credit is the Group's central department in the credit area and is responsible for the preparation and maintenance of goals, governing documents and operational management and monitoring of the Group's credit operations and management of credit risk.

Risk Management is organised independently of the business lines and reports directly to the Group CEO. The executive director of Credit and Risk Management (CRO) can also report directly to the Board of Directors if the situation so requires. The department is responsible for further development and management of the framework for risk management, capital management and internal control, including risk models and risk management systems. The department is also responsible for the ongoing monitoring and reporting of the Group's risk exposure to the Board of Directors.

Compliance is an independent function that identifies, assesses, advises on, monitors and reports on the business's compliance risk. The Group's compliance function covers all business lines, specialist departments and subsidiaries with respect to compliance with regulatory requirements and internal policies. The department is independent and collaborates with other specialists/departments where necessary. This applies in particular to risk management, the legal department and the internal audit, as well as to compliance officers at subsidiaries, etc.

Internal audit oversees that the risk management process is targeted, effective and functions as intended. The internal audit function reports to the Board. The internal audit's reports and recommendations on improvements shall be acted on by the organisation. The Group's internal audit function is performed by EY.

The main task of the external auditor is to assess whether the Group's annual financial statements are in accordance with regulatory requirements, and he/she conducts a full annual audit of the Group's annual financial statements. The **external auditor** also assesses whether asset management is organised in a satisfactory manner and is subject to proper control. Supervisory authorities. SpareBank 1 Nord-Norge is subject to supervision by Norwegian authorities, including Finanstilsynet, the Norwegian Data Protection Authority and others. Finanstilsynet assesses, inter alia, the results of the Group's internal capital adequacy assessment process (ICAAP), internal liquidity adequacy assessment process (ILAAP), recovery plan and annual validation of the IRB models for credit risk.

Documentation and reporting

Systems and policies for risk management and internal control, risk assessments, results of internal controls and evaluations of internal control processes shall be documented. Reporting related to the Group's work on risk management and internal control is done at different levels in relation to the three-line model. The most important reporting includes:

Financial reporting: the Group complies with applicable regulatory requirements and contributes to ensuring relevant, reliable, timely and identical information for the Bank's EC holders and the securities market as a whole. The chief financial officer (CFO) is responsible for financial reporting.

- Investor relations: Treasury is responsible for investor relations (IR). The department maintains ongoing contact with investors and investor environments.
- External reporting: the Accounts Department prepares all financial reports for SpareBank 1 Nord-Norge. The department ensures that the reporting complies with regulatory requirements and accounting standards, and the Board of Directors' guidelines. The department sets guidelines for monthly, quarterly and annual reporting from all business lines and subsidiaries based on internal and external requirements. Control measures have been established for all financial reporting to ensure correct, valid and complete reporting. The measures include reasonableness and probability controls within the specific business lines and on a more aggregated level. In addition, processes have been established to ensure that financial reporting is quality assured on an ongoing basis by means of detailed reconciliation checks carried out on a daily and monthly basis. Any errors and deficiencies are followed up and corrected as and when identified. The external auditor conducts a full annual audit of the Group's annual financial statements.
- Internal reporting: the Governance Department is responsible for the internal accounts and internal reporting on status with respect to financial targets. Good measuring systems are in place for following up all business lines in the Group, where the most central target figures for each business line are followed up on an ongoing basis in the Group's governance system. The CFO continually assesses the business lines' financial results and target attainment, oversees that all units perform in line with the Group's overarching financial goals and reports to the Group CEO.

Risk reporting: developments in the Group's risk exposure, both in financial and non-financial risk areas, in relation to the Group's risk willingness, and relevant internal and external factors are reported to the Board of Directors on a quarterly basis. The CRO is responsible for this reporting.

Compliance report: regulatory changes and developments in the Group's compliance risk in relation to the Group's risk willingness, the policy for compliance and the control plan for the compliance department are reported to the Board of Directors on a quarterly basis. The head of the compliance function is responsible for this reporting.

Internal control reporting: internal control reporting (manager verification) is performed on an annual basis to obtain an overview of managers' assessments of the internal control within their respective areas of responsibility, including their own role in the internal control process. The aim is to provide the Group CEO and Board of Directors with a basis for checking that internal control is being adequately addressed.

ICAAP: in connection with the Group's annual internal capital adequacy assessment process (ICAAP), explicit assessments are made of the risk management and internal control process in all significant risk areas. The ICAAP is reported to the Board and Finanstilsynet. For further information on reporting related to risk management and internal control, see the Group's Pillar3 report.

Deviations from point 10 of the Code of Practice: None.

POINT 11 OF THE CODE OF PRACTICE:

Remuneration of the Board of Directors

The members of the Board of Directors receive a fixed annual remuneration. Remuneration is not performance based. The Chair and Vice-Chair of the Board are remunerated separately and board members who participate in board committees receive remuneration for this. None of the board members elected by the Supervisory Board normally perform work for the Bank beyond their directorships.

Ad hoc committees may be established and are remunerated on a separate basis. The Supervisory Board has set an hourly rate for such work which is utilised for example in connection with the appointment of the Group CEO.

Employee-elected board members participate in the Group's employee savings scheme.

Deviations from point 11 of the Code of Practice:
None.

POINT 12 OF THE CODE OF PRACTICE:

Remuneration of executive personnel

A policy on salary and other remuneration for senior personnel has been adopted that is clear and comprehensible and contributes to the Bank's business strategy, long-term interests and financial resilience. The policy is in the public domain and can be found in the sustainability library.

The Group has established a remuneration policy that conforms to the Group's overall goals, risk tolerance and long-term interests. It is intended to help promote and provide incentives for good management and control of the Group's risk, discourage excessive or unwanted risk-taking, avoid conflicts of interest and ensure compliance with applicable laws and regulations. The policy is approved by the Board of Directors and presented to the Supervisory Board.

The Group's remuneration policy includes special rules for senior personnel, other employees and elected officers with tasks of material significance for the Group's risk exposure. The same applies to employees and elected officers with control duties, ref. the requirements in the Regulations on remuneration arrangements in financial institutions, investment firms and management companies for securities funds.

The Board of Directors has established a remuneration committee as a preparatory body for matters relating to the assessment and fixing of the Group CEO's remuneration. The committee shall also make recommendations to the Board of Directors about guidelines for the remuneration for senior personnel (Group Management). The remuneration committee's mandate is set by the Board of Directors. The policy is submitted to the Supervisory Board. The Board of Directors' statement on executive remuneration is a separate agenda document for the Supervisory Board. Matters previously discussed in the Board's statement on executive salary and in the notes are now disclosed in the «Report on salary and remuneration to senior personnel».

See also the account of the Board of Directors' remuneration committee under point 9. Fixed salary shall constitute the main part of the total remuneration for employees. The CEO, or the person to whom they delegate tasks, is responsible for annually presenting a case to the remuneration committee for the allocation of variable remuneration for senior executives. The committee then presents the case to the board.

Deviations from point 12 of the Code of Practice:
None.

POINT 13 OF THE CODE OF PRACTICE:

Information and communication

Information and effective communication underpin the relationship of trust between EC holders, the Board of Directors and Group Management, and ensure the Bank's stakeholder groups have the opportunity at any time to assess and relate to the Bank. The Bank's information policy therefore attaches importance to an active dialogue with the Bank's various stakeholder groups, in which the focus is on openness, predictability and access.

The Bank also emphasises the importance of correct, relevant and timely information on the Bank's development and performance in terms of inspiring the confidence of the investor market. Information is communicated to the market through the Bank's quarterly investor presentations, website, stock exchange notices and press releases. Regular presentations are also arranged for the Bank's international partners, lenders, investors and other stakeholder groups. The open information practices conform to the non-disclosure rules in force at any and all times. SpareBank 1 Nord-Norge's financial calendar is published on the Bank's website.

Deviations from point 13 of the Code of Practice: None.

POINT 14 OF THE CODE OF PRACTICE:

Takeovers

Any party intending to make an acquisition that will entail becoming the owner of a qualifying holding in a savings bank must send advance notice thereof to Finanstilsynet, ref. section 6-1 of the Financial Institutions Act. The same applies to acquisitions entailing that a qualifying holding will increase to or exceed 20, 30 or 50 per cent, respectively, of the capital or votes of a financial institution, or that the holding will enable a determining influence in the financial institution as mentioned in section 1-3 of the Public Limited Liability Companies Act. An overview of the 20 largest EC holders in SpareBank 1 Nord-Norge can be found in the notes to the accounts and on the Bank's website.

Deviations from point 14 of the Code of Practice: Statutory limit on equity holdings.

POINT 15 OF THE CODE OF PRACTICE:

Auditor

The external auditor is appointed by the Supervisory Board based on the recommendation of the audit committee. The Bank's auditor is identical to the auditor of all the subsidiaries. The external auditor presents an annual plan to the audit committee containing the main features of the execution of the audit work.

The auditor participates in board meetings at which the annual accounts are discussed and in the audit committee's meetings where the accounts are discussed. In addition, the Group's internal control function is reviewed, which includes the identification of weaknesses and recommendations for improvements The Board of Directors holds at least one meeting with the auditor a year without the Group CEO or others from Group Management being present. The external auditor presents a report on these matters to the Bank's Supervisory Board.

Guidelines have been set for Group Management's right to use the auditor for non-audit services.

The Supervisory Board sets the auditor's fees.

Deviations from point 15 of the Code of Practice: None.

Tromsø, 05.03.25

The Board and CEO of SpareBank 1 Nord-Norge

This document is electronically signed, see confirmation after the auditor's report.

Sustainability Statement

Contents of the Sustainability Statement

SpareBank 1 Nord-Norge, as a financial group, has a significant impact on the environment and society. The group has both direct and indirect impacts on stakeholders, climate, nature, society, people, and human rights. This brings with it a responsibility to preserve and strengthen positive impacts and minimize negative impacts. This year's sustainability statement describes how the group works with these topics. The description is based on new rules for sustainability reporting.

The EU's Corporate Sustainability Reporting Directive (CSRD) was made valid in Norwegian law from November 1, 2024, through amendments to the Accounting Act, the Auditors Act, the Securities Trading Act, and others. For SpareBank 1 Nord-Norge, these changes apply to the financial year 2024. Accordingly, the group is required to report in accordance with the European Sustainability Reporting Standards (ESRS), and the reporting is structured according to these standards. This also includes reporting under the Taxonomy Regulation (EU) 2020/852 and its associated delegated acts. The sustainability statement is assured with limited assurance.

Following this is SpareBank 1 Nord-Norge's sustainability statement. The first chapter consists of an overview of the group's work and management of the area. The subsequent chapters are divided based on the Group's material topics.

1. General Information

1.1. Reporting Basis

1.1.1. Basis for the Sustainability Statement

The sustainability statement has been developed for the period 01.01.2024–31.12.2024 and applies to the accounting group with the exception of SpareBank 1 Nord-Norge Portefølje AS (see Table 1-1).*

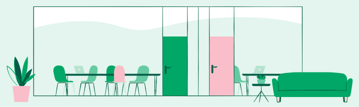
Table 1-1:
The scope of consolidation of subsidiaries in the sustainability reporting with reference to which ESRS standards are relevant.

COMPANY	DESCRIPTION	RELEVANT ESRS					
		E1	E4	S1	S3	S4	G1
SpareBank 1 Nord-Norge	Parent company	X	X	X	X	X	X
SpareBank 1 Finans Nord-Norge AS	Consolidated into the financial statements and sustainability reporting.	X	X	X	X	X	X
SpareBank 1 Regnskap-shuset Nord-Norge AS	Consolidated into the financial statements and sustainability reporting.	X	X	X	X	X	X
EiendomsMegler 1 Nord-Norge AS	Consolidated into the financial statements and sustainability reporting.	X	X	X	X	X	X
Fredrik Langes Gate 20 AS	Consolidated into the financial statements and sustainability reporting.	X					
SpareBank 1 Nord-Norge Portefølje AS	Consolidated into the financial statements. Not included in the materiality assessment and is therefore not consolidated into the sustainability reporting beyond the inclusion of operating costs in the climate accounts.	X					
Rødbanken Holding AS	Is a non-profit limited company and is therefore not consolidated into the group's financial statements. The company is also not included in the sustainability reporting.						

*SpareBank 1 Portefølje AS is not included because the company was not considered material due to its size and function. The company's purpose is to manage ownership stakes held by the Group, partly from previous customer engagements in the bank. The company is administered by the parent bank and has no employees. Therefore, the scope of consolidation for sustainability reporting is not the same as for financial reporting. However, this is not considered to affect the credibility of the sustainability reporting. The company is also included in the group's climate accounts (see 3.8 Greenhouse Gas Accounts).

UPSTREAM

Finance Market
- Fund Provider
- Funding (includes deposits, equity, funding)
- Insurance



Other Goods and Services
- Office Rent
- IT
- Purchase of Goods and Services
- Deliveries from SpareBank 1 Utvikling
- Product Companies

OWN ACTIVITIES

Own Employees

Consulting and Services
- Property Services
- Savings, Investments, and Deposits
- Insurance Brokerage
- Accounting Services and Consulting for Businesses
- Brokerage of Securities and Funds

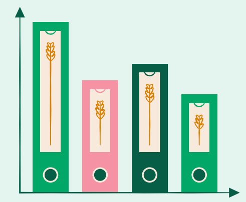
Payment Services

Staff Functions

Sponsorship and Community Engagement

Loans and Financing

DOWNSTREAM



Own Investments
- Liquidity Portfolio
- Jointly Owned Companies
- Associated Companies

Corporate Customers
- SMB (Small and Medium-sized Businesses)
- Relationship Customers
- Large Customers

Private Customers

Community Dividend

SpareBank 1 Nord-Norge's value chain is the sequence of activities, resources, and connections used to create products and services. The figure above illustrates the group's value chain. The sustainability reporting includes data from the upstream and downstream value chain as far as possible.

SpareBank 1 Nord-Norge consists of the parent bank and subsidiaries, hereafter referred to as the Group. The Group is part of the SpareBank 1 alliance, which consists of several independent banks in Norway that collaborate on the development and delivery of financial products and services. The work is organized through the companies SpareBank 1 Gruppen and SpareBank 1 Utvikling DA. All participating banks in SpareBank 1 jointly own the alliance through various ownership shares. The jointly owned companies have central activities that are part of SpareBank 1 Nord-Norge's value chain. Therefore, the sustainability statement contains information about the alliance as part of the value chain. A challenge for this year's reporting is that the various companies will be required to report according to CSRD at slightly different times.

This challenges the collection of accurate data from the value chains. In cases where information about the value chain is omitted, it will be indicated in the relevant section.

The Group has chosen to omit reporting on metrics where it is considered competitive sensitive information. This applies to reporting on material topics in Chapter 5 Own Employees (ESRS S1) and Chapter 3 Climate Change (ESRS E1).

Where reporting deviates from the standard, information about this should be provided in the relevant section, along with an explanation of when the data is expected to be available for reporting.

1.1.2. Specific Circumstances

The Group's double materiality assessment forms the basis for what should be included in the sustainability statement. For a detailed description of the analysis, see 1.4. Double Materiality Assessment. The time horizon for the double materiality assessment and this report follows the same time horizons used by the Group in other risk management, as follows:

- Short: 1 year (Fiscal Year)
- Medium: 2–5 years
- Long: >5 years

The use of estimates in reporting is particularly relevant in connection with the reporting of the greenhouse gas accounting, which is largely based on average emission factors within sectors (see 3.8. Greenhouse Gas Accounts). When reporting is carried out using estimates, there will naturally be uncertainty associated with the accuracy of the reported emission figures.

Special Events in 2024

- The transition to new reporting standards according to ESRS entails several changes for reporting. In previous years, the sustainability statement was written and certified in accordance with GRI; this has now been completely changed to ESRS. New reporting routines have been developed, and training has been conducted for managers and involved professionals.
- In 2024, the Group has changed the model for calculating greenhouse gas emissions for its own operations. This is presented through a new climate account for direct and indirect emissions in the Group. This has led to some changes in calculation methodology and the choice of emission factors. The basis used in the emission calculation has been expanded and now includes the Group's operating costs to quantify the indirect emissions associated with purchased goods and services. The basis is also more comprehensive for the Group compared to previous years, where data was largely based only on the parent bank. The new climate account has been developed by Asplan Viak AS based on their environmentally extended input-output model, Klimakost. Asplan Viak has also been advising the Group's work. For more information, see 3.8. Greenhouse Gas Accounts.
- Affiliated companies in SpareBank 1 Utvikling have been asked to report on greenhouse gas emissions according to the same model as described in the points above. This is to increase the quality of the climate accounts and to simplify the consolidation of the climate account into other reporting. The companies in the alliance will be required to report on CSRD at different times, so it is expected that not all will have climate accounts in place according to this model already this first year.
- In the reporting of the Group's greenhouse gas account, financed emissions from SNN Finans and emissions from leasing (scope 3, category 13) are included.
- The Group has changed its ambition for zero emissions in the loan portfolio from 2040 to 2050. This change in ambition has been made to have a goal that aligns with the adopted climate policy in Norway. This change in ambition does not alter the Group's focus on sustainability, nor does it change the goals and measures that are planned. For more information, see Chapter 3. Climate Change.

Based on the revision of the materiality assessment for 2024, as well as the entirety of CSRD's reporting requirements, reporting in some areas will differ from previous years' reporting setup. Changes apply, for example, to reporting on ESRS E1 (climate change), which replaces previous reporting on the Task Force on Climate-Related Disclosures (TCFD). Also, ESRS S1 has a somewhat smaller scope for HR reporting than in previous years.

1.2. Governance

1.2.1. Administrative, Management and Supervisory Bodies

The Supervisory Board, the Board of Directors with associated committees, and the Group Management constitute the administrative, management, and supervisory bodies in SpareBank 1 Nord-Norge.

1.2.1.1. COMPOSITION AND DIVERSITY

The Board of Directors at SpareBank 1 Nord-Norge has nine members. Seven of the board members are independent members (78 percent), while two are employee representatives without managerial responsibilities. The chairperson, deputy chairperson, and five board members are elected by the Supervisory Board, while the two employee representatives are elected by the employees. The gender distribution of the board is 55 percent men and 45 percent women. A detailed description of the board and the relevant experience and CVs of the board members can be found at snn.no.[1] The board also has two alternate employee representatives.

From 2025, the Group Management consists of the CEO and six executive directors, all with managerial responsibilities. The gender distribution is 57 percent men and 43 percent women. From 2025, the Group Management is divided into three main sections: Business and Risk Management, Customer and Business Value, and Business Development, Efficiency, and Support. More detailed reporting on the composition and diversity in the Group can be found in Chapter 5.8 Diversity and Inclusion.

The Supervisory Board has 40 members with a gender distribution of 47 percent women and 53 percent men. Ten of the members are employee representatives, of which nine do not have managerial responsibilities.

1.2.1.2. ROLES AND RESPONSIBILITIES

At SpareBank 1 Nord-Norge, the management and control of all risk types, including ESG risk[2], are organized according to the three lines of defence model (3LOD).

First Line of Defence: The business areas constitute the first line of defence. Leaders in the first line of defence are responsible for identifying, managing, and reporting on ESG risk related to their own business area. The overall responsibility for the ESG area as a whole is, effective from 2025, assigned to Group Finance.

Second Line of Defence: The Risk Management and Compliance Department constitutes the second line of defence. The Group Director for Risk Management (CRO) and the Head of Compliance (CCO) are responsible for the work on ESG risk in the second line of defence. This includes responsibility for:

- Ensuring that the board adopts a risk willingness in the area.
- Ensuring that governance and control of ESG risk are established in accordance with the board-adopted risk willingness.
- Ensuring compliance with internal guidelines and external requirements and expectations related to ESG risk in accordance with the board-adopted risk willingness.
- Periodic reporting to the Group Management and the board on the Group's risk exposure within ESG risk.

Compliance constitutes the Group's supervisory body with a direct reporting line to the CEO and the Board of Directors. This includes internal controls that monitor and control compliance and the risk of breaches of business conduct requirements. This also includes control of sustainability issues and compliance with new regulations in the area. In 2024, compliance with the Transparency Act was monitored.

Third Line of Defence: The Group's internal auditor constitutes the third line of defence and reports directly to the Board of Directors, which sets annual audit plans. The internal audit conducts annual reviews

[1] https://www.sparebank1.no/en/nord-norge/about-us/about-us/board-of-directors.html
[2] Environment, social and governance (ESG)

of various areas related to ESG risk.

For a detailed description of the three lines of defence model and the Group's operationalization of this, please refer to the Group's Pillar 3 report.

Other Functions for ESG Management:

- **ESG Team:** Established by the CEO with the responsibility to approve engagements that qualify according to the Green Finance Framework (GFF). The team consists of representatives from several business areas and is led by the Group's Head of Treasury. The team also includes a member from the Group's subsidiary (SNN Finans).
- **Risk and Capital Management Steering Committee (RIKAP):** Oversees the overall follow-up of the Group's balance management, risk profile, financing, liquidity, solidity, and ensures that the Group complies with relevant regulatory require-ments. RIKAP handles, among other things, ICAAP, risk strategy, and risk report where ESG risk is included. RIKAP is composed of the Group Director for Risk Management (CRO), Group Director for Group Finance (CFO), Group Director for Corporate Market, Group Director for Personal Market, and leaders from relevant specialist departments.

Sustainability issues are embedded and followed up through the Group's business management system, governance documents, and core processes. Achievement of ESG goals is reported to the Group Management quarterly, and ESG risk is reported to the Board of Directors at the same frequency. A role and responsibility matrix (HUKI) for ESG has been adopted and implemented in the organization. This defines how responsibility for the various sustainability topics is assigned to responsible managers in the Group.

The material topics with associated impacts, risks, and opportunities (IROs) identified through the double materiality assessment are adopted by the Board of Directors and followed up by responsible Group Directors through policies, goals, and measures in several different specialist areas. The identified risks are the particular responsibility of the Risk Manage-ment Department, and the identified opportunities will, among other things, belong to the various functions for business and business support. The responsibility for reducing negative impacts and strengthening positive impacts is assigned to the various specialist departments with relevant responsibility for the area. For example, the responsibility for IROs related to own employees is assigned to the HR Department. IROs that are not yet integrated into the management systems will be followed up by the Sustainability Department to ensure clearer responsibility allocation by 2025.

1.2.1.2.1. Roles and Responsibilities of Group Management

ESG-related risks and opportunities are managed through the work of the Group Management, including strategic discussions, approval of goals and ambitions, and the preparation of governing documents. In 2024, this particularly applies to the following matters in the Group Management:

- **Double Materiality Assessment:** In the third quarter, the Group Management adopted a revised version of the double materiality assessment. In this context, an update of the Group's work on the implementation of CSRD was also made.
- **Tactical Goals 2024:** The Group's climate goals in 2024 have been operationalized through tactical goals for emission cuts. The tactical goal is further operationalized within each of the Group Directors' areas of responsibility through specific sub-goals, status on goal achievement, and ongoing reporting to the Group Management in the Group's business management system.
- **Transition Plan – Net Zero:** In the second and third quarters, the Group Management has had follow-up cases related to the transition plan. Through busi-ness management, the status of financed emissions is presented to the Group Management quarterly.
- **Role and Responsibility Matrix (HUKI):** The Group Management has adopted the placement of roles and responsibilities for ESG through a HUKI. This was adopted in the second quarter.
- **New Mandate for ESG Team:** In connection with the launch of the revised Green Finance Framework in the second quarter, the Group Management adopted a new mandate and composition for the ESG team.

Innovation Portfolio Board: The Group has an estab-lished framework for handling new ideas and initiatives that encompass both small and larger business ventures. Issues related to ESG are considered where relevant.

In 2024, climate-related risks and opportunities were particularly addressed in the following initiatives:

- Work on green loans in the SpareBank1 alliance on products, product frameworks, transition financing, and competence plans that can be used by all alliance banks.
- Continuation of the work to develop a new customer journey for current mortgage customers with the need to qualify homeowners for green mortgages.
- Development of ESG dashboards for both the personal and corporate markets.
- Program to enhance ESG competence in specialist roles.
- Establishment of an operational roadmap and plan for the next steps in sustainable business development for the personal market in 2025.

Executive Vice President Business Development and Technology, Executive Vice President Risk (CRO), Executive Vice President Corporate Finance (CFO), Executive Vice President Organization and Business Support, Executive Vice President BM, and Executive Vice President PM are permanent representatives in the portfolio board.

1.2.1.2.2. The Board's Roles and Responsibilities

The Board is well acquainted with and involved in the company's material sustainability issues. The Board and the Audit Committee adopted the double materiality assessment in the fourth quarter of 2024. Several matters concerning the IROs are continuously reported to the Board. The Board's involvement in sustainability issues occurs through strategic discussions, updating and approving the most central governing documents, as well as various reports from the administration throughout the year. Additionally, the Board oversees and develops both business strategy and risk strategy. In 2024, a special review of some of the governing documents addressing sustainability issues was conducted, and adjustments to policies were made where necessary.

The Board's oversight of material issues occurs through both regular annual reports and ad hoc reports in the area, which include assessments of the company's impact, risks, and opportunities. The most established reports are through the risk area. For 2024, two new material topics have been added to the company's materiality assessment. Consequently, it will take some time before full reporting on these topics is at the same level as the material topics the company has more experience with.

The Audit Committee consists of three board members and has a special responsibility for the process of identifying the information the company must report on according to the ESRS standards. The Audit Committee also has a special responsibility for sustain-ability reporting, including systems for monitoring, risk management, and internal control. The responsibilities are defined in the Audit Committee's mandate.

The most central reports to the Board throughout the year include:

- **Risk Report (quarterly)**: The development of the company's risk exposure within ESG risk is reported as a separate area in the risk report. Regulatory changes, status of internal work and external collaboration, as well as the status of risk exposure in relation to the adopted risk willingness, including ESG metrics, are part of the reporting.
- **Compliance Report (quarterly)**: Compliance risk related to ESG is reported as a separate area in the compliance report.
- **Internal Audit Report (every four months)**: The internal audit's reporting to the Board includes findings and recommendations from completed internal audit projects and will include ESG matters where they have been subject to internal control.
- **ICAAP (annually)**: The annual assessment of the company's overall capital needs and risk exposure includes ESG risk.
- **Sustainability Policy (annually)**: Adopted annually by the Board and provides guidelines for other policies that address ESG.
- **First-line Reporting (quarterly)**: Reported to the Board and executive management. Business areas and specialist departments are responsible for identifying, controlling, reporting, and documenting risks in processes according to adopted principles. Risk-reducing measures must be implemented to ensure that residual risk is at an acceptable level and within the Board-approved risk willingness. Areas covered include ICT, Data Privacy (GDPR), AML, HR, and Customer (process, product, and systems).

The Board also considers material topics in connection with the approval of larger credit commitments within the corporate market. This can, for example, concern climate risk. The material topics are also included in the Board's assessments with major decisions on outsourcing, investments, acquisitions, divestments, etc., through risk assessments of decisions according to the company's risk assessment framework (NPAP).

The Board's oversight of material IROs and the evalua-tion of this will be reviewed after the reporting of the 2024 financial year.

1.2.1.2.3. Roles and Responsibilities of the Supervisory Board

The highest governing body in SpareBank 1 Nord-Norge is the Supervisory Board. This body consists of equity certificate holders, depositors, employees, and public representatives. The responsibilities of the Representatives include:

- Electing members to the bank's board and nomina-tion committee.

- Supervising the board's management of the bank.
- Approving the annual report and financial statements.
- Electing an external auditor and determining the auditor's fee.
- Allocating funds for public benefit purposes in accordance with the Financial Institutions Act.
- Authorizing the issuance of subordinated loans and other debt instruments.

1.2.1.3. COMPETENCE

The Board's and executive management's competence in sustainability is primarily ensured through the various members' experience from board and management work in the business sector and other organizations. In 2024, an assessment of the Board's competence in ESG was conducted. Measures to address competence gaps have been established and followed up in the company's sustainability competence plan, as well as mandatory courses in AML and CSRD. The policy for the Board's competence has been updated in line with increased competence requirements.

The following training was conducted in 2024:

- Board members have been introduced to the CSRD regulations and the company's work on this as part of the Board's competence plan. Completion rate: 100 percent.
- The CSRD course has been mandatory for all managers in the company: Completion rate: 82 percent.

The administration's competence is ensured through a dedicated sustainability department with three main tasks: control of ESG, advising other departments, and sustainability reporting. The top responsibility for the area has, until 2025, been with the Executive Vice President for Communication, Society, and Sustainability. From 2025, the responsibility has been transferred to the Executive Vice President Corporate Finance. Furthermore, the responsibility for sustainability is distributed across all units. Within the departments, corporate market, risk management, and Treasury, there are dedicated ESG specialists. Social sustainability and governance issues are followed up by respective specialist departments such as HR, Anti-Money Laundering, and Community Engagement.

1.2.2. Disclosure and Handling of Sustainability Matters

The Group's double materiality assessment was revised in 2024. The assessment was first discussed in the Executive Management before being presented to the Board in the autumn of 2024. The responsible Executive Vice President for the area in 2024 was in charge of presenting the matter. This was the first time the materiality assessment was adopted by the Board; previous versions had been adopted by the CEO. This was the company's fourth version of the materiality assessment, and at the same time, the first to follow EFRAG's guidelines on double materiality assessment. After being reviewed by the Board, the overview of the adopted IROs and material topics was communicated and distributed to the company. Governing documents, measures, and goals have been followed up and revised as far as possible in 2024.

The new approach to double materiality, and findings uncovered in the form of IROs, will take time to fully implement in the company through strategies, policies, goals, and measures. The revision of the materiality assessment with associated targets in the area will be updated and presented to the Board annually. The same applies to the Sustainability Policy, which provides the overarching guidelines for the company's work with ESG. A complete list of IROs is prepared under 1.3.3. Material IROs.

The Board's role in handling sustainability topics includes:

- Adopting the company's business strategy
- Adopting the company's double materiality assessment and the associated identified sustainability topics and IROs
- Adopting significant policies that define the governance of sustainability issues and IROs
- Setting ESG metrics in the risk strategy and monitoring them quarterly
- Monitoring material sustainability topics and receiving annual reports
- Responsibility for the company's sustainability reporting as part of the Board's report

1.2.3. Sustainability-Related Incentive Schemes

SpareBank 1 Nord-Norge has no bonus schemes linked to its employees or governing bodies. More about this can be read in the Guidelines for Remuneration in the sustainability library at snn.no. Consequently, there are also no remunerations linked to the achievement of sustainability goals in the company.

1.2.4. Due Diligence

Table 1-2 provides an overview of how SpareBank 1 Nord-Norge conducts due diligence assessments and where this is described in the sustainability report.

Table 1-2:
Description of where SpareBank 1 Nord-Norge's due diligence assessments can be found in the sustainability report.

KEY ELEMENTS IN THE DUE DILIGENCE ASSESSMENT	RELEVANT ESRS REQUIREMENTS	WHERE IT IS REPORTED IN THE SUSTAINABILITY REPORT
a) Embedding due diligence in governance, strategy and business model	ESRS 2 GOV-2	1.2.2. Disclosure and handling of sustainability matters
	ESRS 2 GOV-3	1.2.3. Sustainability-related incentive schemes
	ESRS 2 SBM-3	1.3.3. Material IROs
b) Engaging with affected stakeholders in all key steps of the due diligence	ESRS 2 GOV-2	1.2.2. Disclosure and handling of sustainability matters
	ESRS 2 SBM-2	1.3.2. Stakeholder engagement
	ESRS 2 IRO-1	1.4.1. Identification and assessment of IROs
	MDR-P	5.2 Policies – Own workforce 6.2 Policies – Affected local communities 7.2 Policies – Consumers and end-users
	Topical ESRS: reflecting stakeholder engagement	5.3 Stakeholder engagement– Own workforce 6.3 Stakeholder engagement – Affected communities 7.3 Stakeholder engagement – Consumers and end-users
c) Identifying and assessing adverse impacts	ESRS 2 IRO-1	1.4.1. Identification and assessment of IROs
	ESRS 2 SBM-3	1.3.3. Material IROs
d) Taking actions to address those adverse impacts	MDR-A	3.3 Actions – Climate change 4.3 Actions – Biodiversity and ecosystems 7.3 Actions – Consumers and end-users 8.1–8.4 Actions – Business conduct
	Topical ESRS: reflecting the range of actions , including transition plans	The Group does not report on a transition plan in accordance with ESRS E1
e) Tracking the effectiveness of these efforts and communicating	MDR-M	
	MDR-T	3.6 Targets – Climate change 5.4 Targets – Own workforce
	Topical ESRS: regarding metrics and targets	

SpareBank 1 Nord-Norge reports in accordance with the Transparency Act, which came into force in 2022. A statement of the areas identified with risk of violations, as well as the actual due diligence assessments, can be found in the sustainability library on snn.no. The process described there is developed based on the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. The Group will conduct new risk assessments in 2025 with the aim of improving compliance with the Transparency Act.

Furthermore, the Group prepares its own statement in accordance with the Equality and Anti-Discrimination Act §§26 and 26a (the duty of activity and reporting). It is available in the sustainability library on snn.no. More information can be found in Chapter 5. Own workforce.

1.2.5. Risks Related to Sustainability Reporting

The new sustainability directive entails both an increased scope and higher quality requirements for sustainability reporting. Since 2023, the Group has been preparing for these requirements by analyzing the differences between the new and previous reporting standards. Several actions have been implemented to improve reporting, including assigning responsibility to specific units. This has been formalized in a role and responsibility matrix adopted by the Group CEO (HUKI). The responsibilities are further described in the sustainability reporting routine, which includes expectations to:

- Familiarize oneself with the reporting requirements relevant to the field based on IROs and material reporting standards.
- Ensure that policy, actions, and targets are in place.
- Understand the data requirements for the reporting points. This also includes assessing how the reporting points can be addressed in the long term and preparing the unit for reporting points with phasing-in requirements.

Furthermore, all of the Group's managers have received mandatory training in CSRD.

However, the Group acknowledges that there will be risks associated with the introduction of the sustainability directive in the first few years. The following risks have been identified:

- Incorrect figures, missing or incomplete data
- Time constraints with tight deadlines
- Lack of compliance between actual reporting and the ESRS sustainability standards
- Lack of internal control of sustainability reporting
- Quality of reporting

The list of risks is not exhaustive and will evolve over time. The risks are identified through a simplified risk matrix that the group uses for risk management. This is presented to the board in connection with the annual report and will be included in the planning of reporting for 2025. The risk assessments are also registered in the Group's operational risk management system.

1.3. Strategy and Business Model

1.3.1. Strategy, Business Model, and Value Chain

SpareBank 1 Nord-Norge has the vision "for Northern Norway." This entails a geographical commitment, but also an explicit strategy to contribute to development, sustainable value creation, and growth for the region. The values are largely created in and for Northern Norway. At the same time, the Group is part of a national alliance and is closely intertwined with the international economy. The Group creates value by offering its products in a market and connecting this to an international capital market.

The world is facing significant climate-related changes and increased pressure on natural resources. This not only harms nature and society but also affects financial stability globally. This, combined with climate policies both in Norway and the EU, increased reporting requirements for businesses, and society's general movement towards low emissions, will impact SpareBank 1 Nord-Norge's ability to operate and create value in the future. Sustainability and ESG risk are therefore part of both the group's business strategy and risk strategy. Both strategies guide the Group's work and are reviewed annually by the board and Group management.

SpareBank 1 Nord-Norge offers a wide range of products and services to both individuals and businesses within banking, accounting, real estate, and financing. The primary market area is customers in Northern Norway, and the customers are located both in cities and rural areas. In 2024, the group opened up for customers outside the region to also become customers of SpareBank 1 Nord-Norge, and during the year, they have noticed an increase in demand from other parts of the country. The Group has a strong local focus and is committed to supporting local communities through various initiatives and projects. Most of the Group's employees live and work in Northern Norway.

Below is a listing of the most essential products and services the group offers.

Products and Services for the Private Market

- Loans for purchasing or building a home
- Refinancing of mortgages and consumer debt
- Consumer loans, car loans, and leasing
- Savings and investment products such as savings accounts, funds, stocks, and pension savings

One of the tools for green transition is green loans. Green loans are products linked to energy labels and loans for environmentally friendly and energy-saving measures in new and old homes, holiday homes, cabins, and commercial properties. The loan offers the customer favorable interest rates, whether they are building new, renovating, or simply switching to energy sources with less environmental impact. These are products that engage customers and stakeholders in dialogue with the Group. The green loans are developed based on green finance frameworks. Green loans to customers can be used to purchase green bonds in the capital market. These loan products are therefore an important driver of the group's work with the Net Zero ambition, taxonomy reporting, and growth ambitions.

In 2024, the Group has worked to increase green mortgage financing, which is followed up through corporate governance. Status of green mortgages in 2024:

- Green mortgage: 3,077 loans
- Green first home loan: 659 loans
- Green flexible loan: 855 loans

A challenge in the work with green loans is what has emerged in recent years regarding the lack of energy labels and compliance with the Energy Labeling Regulations. There are approximately 260,000 homes in Northern Norway, of which only 22 percent have an energy certificate. The lack of energy labeling slows down the green transition of the property stock because energy improvements of buildings must be correctly documented. It also poses a direct risk to the customer who has an incorrect energy label or lacks information about their property, which can affect rental, sales, and documentation during upgrades.

An important priority in 2024 has therefore been to work on increasing data quality within ESG regarding the property stock, especially by obtaining energy certificates. This is outlined in the Group's risk strategy and further followed up in the credit policy. Documented energy certificates are also necessary for banks' facilitation of green products and for reporting on the EU taxonomy.

Products and Services for the Corporate Market

- Leasing services for vehicles through SNN Finans
- Savings and investments: Opportunities for stock trading, fund placements, and fixed-rate deposits
- Business loans, overdraft facilities, and guarantees

GREEN LOANS ACCORDING TO GREEN FRAMEWORKS (MNOK)	31.12.2024
Green homes	8.848
Green commercial buildings	2.448
Renewable energy	2.043
Clean transport	1.335
Sustainable management of natural resources and land use	3.094
Green homes in SpareBank 1 Boligkreditt	8.960

GREEN LOANS ACCORDING TO GREEN FRAMEWORKS (MNOK)	31.12.2024
Own issued debt, ex. subordinated loans and fund bonds	21.116
Own issued green deposits	8.285
Share of OMF financing in SpareBank 1 Boligkreditt	47.840
Share of green OMF financing in SpareBank 1 Boligkreditt	6.424

OMF = Covered Bonds

Responsible financing and comprehensive ESG assessments in the financing process are the most important tools the Group has to influence the business community towards green transition and to address several of the sustainability matters that are material for the Group. The Group has its own ESG module where this is screened. The questions asked in the ESG assessments affect the customer's risk profile and are an integrated part of the customer dialogue and financing process. Customers who have a satisfactory ESG score and also meet the criteria in the green finance framework can be included in the Group's green portfolio and gain access to green financing. Assets in the green portfolio are qualified through the group's ESG team.

There are no reported changes in significant products compared to previous reports.

1.3.2. Stakeholder Engagement

SpareBank 1 Nord-Norge's key stakeholders can be divided into seven groups and include customers, employees, the Northern Norwegian community, authorities, investors and rating agencies, suppliers and partners, as well as silent stakeholders such as nature and wildlife. The dialogue, outcomes, and the Group's further follow-up can be seen in Table 1-3.

Table 1-3:
Overview of SNN's key stakeholder groups, dialogue with them, and further follow-up

STAKEHOLDERS	FORM OF DIALOGUE	IMPORTANT THEMES	SNN'S FOLLOW-UP
Customers	• Position measurement PM and BM • Customer meetings PM and BM • Sustainability survey 2024	• ESG assessments in credit cases • Customer satisfaction with SNN	**Actions:** • Findings from the sustainability survey have been an important insight basis in identifying IROs **Informing governing bodies** • Position measurement is presented annually to the group management and contributes to the strategy process • IROs are presented to the board in connection with double materiality
Own workforce	• Development conversations • Personnel report • WinningTemp • First-line reporting • Internal and external whistleblowing channel • Tripartite cooperation/AMU • Diversity forum	• Competence and Courses • Absence due to illness • Inclusion • Job engagement	**Actions** • Green competence plan • Mapping of absence due to illness **Strategic Changes** In 2024, SNN has had a new strategic goal: engaged employees in an inclusive organization. They measure job engagement among all employees. **Informing Governing Bodies** • Quarterly reporting to Group Management • Review of status in WinningTemp
The Northern Norwegian Community	• Sustainability survey 2024 • Evaluation of Samfunnsløftet 2024 • Media coverage • The Board of Representatives • Conferences (Agenda Nord Norge) • Investor dialogue	• Profitability related to green transition • Few consider sustainability as strategically important • Interpretation of sustainability reporting requirements	**Actions** • Participation in the SINTEF research project – FiskInfoPlattformen • Programming of Agenda Nord-Norge • Various articles in the Knowledge Bank kbnn.no • Findings from the sustainability survey have been an important insight basis in identifying IROs **Strategic Changes** In 2024, SNN has had a new strategic goal: the proportion of people planning to stay in the region. **Informing Governing Bodies** • IROs are presented to the board in connection with double materiality • Evaluation of Samfunnsløftet is presented to the board and group management

STAKEHOLDERS	FORM OF DIALOGUE	IMPORTANT THEMES	SNN'S FOLLOW-UP
Authorities	• Dialogue with the Financial Supervisory Authority of Norway (Finanstilsynet) • Consumer Authority (Forbrukertilsynet) • Participation in Finance Norway's expert committee	• The bank's role in the green transition • Protect consumers from data loss • The Consumer Authority (Forbruker-tilsynet) is concerned that banks should conduct due diligence assessments • The group is legally required to report in accordance with the EU's sustainability standards (ESRS)	**Actions** • New reporting position in the bank's sustainability department • Updated the group's double materiality assessment in line with ESRS • Improved routines and risk assessments of the Transparency Act **Strategic Changes** Sustainability has been clearly anchored in the group's strategy **Informing Governing Bodies** • The board adopted the updated materiality assessment in the autumn of 2024 • The board receives information about internal control in the area
Investors and rating agencies	• MSCI report • Conferences • Investor presentations and meetings • Identification and reduction of climate risk and greenhouse gas emissions • Taxonomy alignment	• Identification and reduction of climate risk and greenhouse gas emissions • Taxonomy alignment	**Actions** • Revised green finance framework • Qualification of green assets through the ESG team • Reporting on goal achievement • Improving the quality of taxonomy reporting **Strategic Changes** The proportion of taxonomy-aligned residential and commercial properties is included as a metric in the risk strategy
Suppliers and partners	• Supplier follow-up • Collaboration with the SKIFT network • Climate partners • Norwegian Fishermen's Sales Organization (Norges råfiskelag) • Alliance network in the SB1 alliance • Finance Norway	• Greenhouse gas emissions and green transition • Data quality • Interpretation of reporting requirements	**Actions** • Further development of green products in the alliance • Contributor to the update of Finance Norway's emissions guide • Collaboration forum on the interpretation of reporting requirements in the Alliance **Informing Governing Bodies** • The board adopts an annual statement on compliance with the Transparency Act • The board receives information about internal control in the area
Silent stakeholders (such as climate, nature, and animals)	• Conferences • News articles • Research reports	• Limiting greenhouse gas emissions • Limiting nature interventions • Understanding the financial industry's role in connection with major nature interventions	**Actions** • The group maintains a climate account and has expanded the number of emission categories for 2024 • Identify IROs in the group's materiality assessment **Strategic Changes** Material topics related to ESRS E1 and E4 will influence the group's strategies going forward. **Informing Governing Bodies** • Quarterly reporting on financed emissions to the group management • Materiality assessment

1.3.3. Material IROs

The group has identified material impacts, risks, and opportunities within six topics, which are further described in Table 1-4.

Table 1-4:
Overview of SNN's material topics and the associated material impacts, risks, and opportunities.

THEME	MATERIAL IMPACT	MATERIAL RISK/ OPPORTUNITY	DESCRIPTION	PLACEMENT IN VALUE CHAIN
Climate Change	Yes	Yes	• Negative impact on climate change through greenhouse gas emissions in the loan portfolio. • Risks are related to the portfolio's exposure to physical risk, greenhouse gas emissions, and energy performance distribution. Other risks are associated with decisions made on an insufficient basis and potentially weak follow-up on own ambitions regarding emission cuts. • Opportunities include transition-related products and services, increased insight into ESG matters, and improving the energy efficiency of the housing portfolio.	Own operations and downstream value chain
Biodiversity and ecosystems	Yes	No	• Negative impact on biodiversity and ecosystems through financing projects that contribute to nature degradation.	Downstream value chain
Own workforce	Yes	Yes	• Positive impact on the inclusion of employees and their competence development, workday, and conditions. • Risk related to sick leave.	Own operations
Affected communities	Yes	Yes	• Positive impact on the Northern Norwegian community through financing businesses and allocations through Samfunnsløftet. • Reputation risk associated with financing projects that use natural resources.	Downstream value chain
Customers and end-users	Yes	Yes	• Potential negative impact on customers' access to products • Reputation risk associated with greenwashing and potentially material financial effects from cyberattacks or breaches of personal data security	Own operations and downstream value chain
Business Conduct	Yes	Yes	• Potential negative impact on human rights through the supply chain. Positive impact on own corporate culture and prevention of financial crime. • Risk of significant losses related to financial crime and fraud.	Upstream value chain, own operations, and downstream value chain

It has not been identified that the Group's material risks and opportunities have materialized into financial effects in the short term, except for fraud compensations, where the group incurred costs of 16 MNOK in 2024. However, it is in the medium and long term that the risk of financial consequences is greatest. There is significant uncertainty associated with the financial effects of the risks in the medium and long term, and it is currently challenging to quantify these. At the same time, financial risks have been identified in the Group's double materiality assessment, and actions will be further developed to manage these and prevent them from materializing.

Risks that have been identified will be included in the Group's risk management work. This is further described in Chapter 1.4.2.

Annual assessments of the business model's risk exposure to ESG are conducted through internal processes for risk exposure and capital needs (ICAAP). Additionally, risks have been identified through the work on double materiality.

The impact falls within the responsibility of the relevant units. Where positive impact has been identified, this will be highlighted through goal achievement reporting. Where negative impact has been identified, actions will be implemented to reduce negative impact and mitigate any risk. In some cases, a plan for mitigating actions has also been implemented, mainly related to potential breaches of the
Transparency Act through the supply chain. The time horizon for all impacts is assessed to apply in the short, medium, and long term.

For **the opportunities** identified, these will mainly benefit the business areas of the Group. This will be reported through target achievement in the annual report and as quarterly reporting of results in business management.

Identified IROs are also subject to dialogue with companies and suppliers in the SpareBank 1 alliance and will be followed up further into 2025.

Table 1-5 provides an overview of changes in material topics from 2023 to 2024.

Table 1-5:
Changes in material topics from 2023 to 2024.

	Material topics from 2023	Revised material topics 2024
E	Climate Change (ESRS E1)	Climate Change (ESRS E1)*
	Green Transition (SNN)	Biodiversity and ecosytems (ESRS E4)
S	Own workforce (ESRS S1)	Own workforce (ESRS S1)
	Affected communities (ESRS S3)	Affected communities (ESRS S3)
		Consumers and end-users (ESRS S4)
G	Business Conduct (ESRS G1)	Business Conduct (ESRS G1)

*«Green transition» is included in ESRS E1

Some of the IROs and material topics are new to the Group. Therefore, more time will be needed before the follow-up of these is implemented in strategy and follow-up in a good way. For the same reason, changes in the Group's material IROs compared to last year will not be addressed. The Group has not developed its own entity-specific reporting requirements in 2024.

1.4. Double Materiality Assessment

2024 is the first year that SpareBank 1 Nord-Norge is required to report in accordance with CSRD, and the Group therefore updated its double materiality assessment from 2023. Despite the 2023 assessment being based on CSRD and the associated sustainability standards ESRS, there was still a need for a clearer definition of the Group's material impacts, risks, and opportunities (IROs). The material IROs are central to the reporting framework, as they determine where sustainability efforts should be prioritized, and consequently which requirements should be reported on. Additionally, ESRS sets requirements for how the materiality assessment should be conducted, such as which assessment criteria should be emphasized in the evaluation of the identified IROs. Therefore, it was necessary to incorporate these into the Group's analysis. These aspects made the process for the 2024 materiality assessment somewhat different from the 2023 assessment, with a clearer ESRS profile. Since SpareBank 1 Nord-Norge's sustainability statement is published annually, it will also be relevant to annually assess the Group's material IROs and consequently which information is essential to include in the sustainability statement. The double materiality assessment is developed based on the principles of ESRS and EFRAG's guide for double materiality. The process is facilitated by the parent bank's sustainability department. The analysis will be revised during 2025.

1.4.1. Identification and Assessment of IROs

1.4.1.1. IDENTIFICATION OF IROS

Impacts, risks, and opportunities were identified and categorized based on the list of topics and subtopics in the reporting standard (specified in ESRS 1 § AR 16). The insights used for these assessments included previous materiality assessments and stakeholder analyses. These were based on input from stakeholders about their expectations for the Group's sustainability work, as well as topics particularly relevant to the financial sector's role in sustainability. The insights were further used to define the Group's relevant topics and subtopics for sustainability in a so-called long list. The topics were then scored based on the group's scoring methodology (as described in 1.4.1.2) to determine the material IROs for 2024.

Relevant sources used to gather stakeholder viewpoints and industry-specific topics for banking and finance:

- Internal sources: Internal reports and analyses, customer surveys, employee surveys, the Group's business and risk strategy, previous materiality assessments, and stakeholder interviews.
- External sources: Annual reports, research reports, news articles, surveys, reporting standards, ESG ratings, recommendations from Finance Norway to the industry, SASB sector-specific standards for banking and finance.[1]

The various stakeholders' viewpoints are further described in the group's stakeholder dialogue (see 1.3.2. Stakeholder Engagement). In identifying impacts, efforts were made to cover SpareBank 1 Nord-Norge's business, with a particular focus on impacts that could arise in connection with lending, loan activities, procurement, employee relations, and financial monitoring. This included identifying impacts related to the Group's own operations, such as those affecting the Group's employees, but also impacts resulting from the Group's business relationships, such as the supply chain and customers.

1.4.1.1.1. Specific Considerations Related to Climate and Biodiversity

In the identification and assessment of the Group's climate-related impacts, special focus has been placed on evaluating the Group's greenhouse gas emissions, including Scope 1, Scope 2, and Scope 3.

In identifying and assessing the Group's climate-related physical risks, map data from NVE, which Eiendomsverdi has linked to residential and commercial properties at the object level, is used to assess the portfolio's exposure to sea level rise, storm surge, flooding, snow and rock slides, mountain slides, soil and flood slides, quick clay slides, and surface water. NVE's map data is based on emission scenarios. The emission scenario

[1] https://sasb.ifrs.org/

RCP 8.5 is used for sea level change until 2090, while areas considered flood zones for the 200-year flood in 2100 are based on combinations of the emission scenarios RCP 4.5 and RCP 8.5.

Issues related to biodiversity are identified, among other things, from the overall assessment of the Group's risk exposure and capital needs (Internal Capital Adequacy Assessment Process, ICAAP). This includes the Group's risk exposure to the Nature Index and ecosystem development in Norway, as well as the impact of the Nature Agreement on the region. This is further compared to the industries the Group finances. Here, the lending process was particularly assessed to have a negative impact on nature degradation and ecosystems. This is because financing is the Group's strongest tool, and thus a place both to reduce risk and to influence change.

To understand more about the Group's dependence on intact ecosystems and the associated risks, more analyses will be required in the future for the group and its value chain. No analysis has been conducted on systemic risk related to biodiversity. Nor have specific consultations been conducted with affected local communities on issues related to biodiversity. This, along with other topics within climate and biodiversity, may be relevant for the Group in future analyses. Priorities related to this are further described in Chapter 4. Biodiversity and Ecosystems.

Table 1-6:
Climate-Related Transition Events

EXAMPLES OF CLIMATE-RELATED TRANSITION EVENTS			
POLICY AND LEGAL	TECHNOLOGY	MARKET	REPUTATION
Increased pricing of GHG emissions	Replacement of existing products and services with opportunities for lower emissions	Changes in customer behaviour	Changes in consumer preferences
Increased reporting obligations for emissions	Costs of transitioning to lower-emission technology	Uncertainty regarding market signals	Stigmatization of the sector
Mandates on and regulation of existing products and services		Increased costs of raw materials	Increased concern among stakeholders
Mandates and regulations on existing production processes			Negative feedback from stakeholders
Exposure to litigation			

In identifying climate and nature-related transition risks and opportunities, the Group has, to the best of its ability, tried to consider how the Group, through its own operations or through its customers, could be affected by transition events. Among other things, it has been guiding to base this on a societal transition in line with limiting global warming to 1.5°C, as well as the provisions of the Nature Agreement, which are expected to affect taxes, regulations, behaviour changes, and customer preferences. Examples of transition events are outlined in Table 1-6.

Refer to Chapter 3.1 for a more detailed description of the data basis and stress testing methodology used in the area of climate risk.

All the Group's offices are located in Northern Norway, in cities or densely populated areas on already developed land. It has therefore been assessed that the Group does not have locations in areas with vulnerable biodiversity. However, SpareBank 1 Nord-Norge acknowledges that nature often loses in matters related to land use, and that the financing business can contribute to nature degradation. All financial centres in the Group are located in vulnerable, Arctic areas. The work to preserve biodiversity is still in its early stages, but the Group is aware of the need to develop measures that can limit the loss of biodiversity in the future.

1.4.1.2. ASSESSMENT AND SCORING OF IROS

The Group has placed great emphasis on ensuring that the materiality assessment provides a balanced picture of SpareBank 1 Nord-Norge's impact. It has therefore been crucial to include areas where the group may have a negative impact, to avoid the analysis giving an unjustifiably positive impression of the Group's overall impact. Unaddressed negative impacts can often develop into risks, just as positive impacts can develop into opportunities. The Group has therefore strived to identify and understand these dependencies in its assessment of relevant topics.

To identify which of the IROs were material, the long list of IROs was assessed and scored in workshops with internal experts. The participants were associated with areas such as sustainability, risk management, HR, procurement, and IT security. In line with ESRS 1, two different scoring methodologies were used: one for impacts and one for risks and opportunities. For the identified impacts, a distinction was made between positive and negative, and whether the impact was actual or potential. Furthermore, the impacts were assessed based on the criteria of likelihood, scale, scope, and irremediable character (Table 1-7).

Risks and opportunities, on the other hand, were assessed based on the criteria of likelihood and financial magnitude (Table 1-8). The threshold values used in scoring the financial magnitude were aligned with the economic cost that the Group's internal risk department uses in operational risk management. All IROs that ended up with a score above a defined materiality threshold were considered material.

Table 1-7:
Scoring Criteria Used for Impact

SCORE	LIKELIHOOD How likely is it that the impact will occur?	SCALE How severe/beneficial is the impact?	SCOPE How widespread is the impact?	IRREMEDIABILITY Can it be reversed?
1	Very unlikely	Insignificant	Limited/very few	Relatively easy
2	Unlikely	Low impact	Low/some	With effort (time and cost)
3	Moderately likely	Moderate impact	Moderate/significant portion	Difficult to reverse
4	Likely	High	Widespread/majority	Very difficult to reverse
5	Very likely/actual impact	Critical	National/global/almost everyone	Irreversible

Table 1-8:
Scoring Criteria for Risks and Opportunities

SCORE	LIKELIHOOD How likely is it that the risk/opportunity will occur?	FINANCIAL MAGNITUDE What cost will it incur?
1	Very unlikely	Insignificant
2	Unlikely	Low impact
3	Moderately likely	Moderate
4	Likely	Severe
5	Very likely	Critical

1.4.1.3. VALIDATION AND DECISION OF IROS

An internal validation group was established to review the scoring of all material IROs. The validation group consisted of leaders in the areas of Compliance, Risk, Treasury, and Organization. To ensure a comprehensive picture of the Group's material impacts, risks, and opportunities, some adjustments were made to the scores.

The final materiality assessment was presented to the Group management and decided by the board in the autumn of 2024.

1.4.2. Risk Management Process of IROs

Risks that, in the short, medium, or long term, can challenge the Group's overall risk willingness are included as risk types in the Group's risk management process. Here, underlying risk drivers for each risk type are also identified. The purpose of the Group's risk management processes is to identify and set levels for indicators that can monitor these risk drivers, thereby ensuring compliance with the Group's overall risk willingness, which is qualitatively defined as "low to moderate."

ESG risk emerges as a separate risk type. The risk management process thus involves, among other things, identifying and managing the IROs that are identified as material for the Group. The Group's risk willingness within ESG risk is, like the overall risk willingness, defined as "low to moderate." The risk willingness for ESG is further quantified and operationalized through principles, metrics, and frameworks in governing documents. The process of identifying IROs is a continuous process, where governing documents and processes both set premises for focus areas within ESG, but also change as a result of new information from work with other governing documents and processes. Below is an overview of governing documents, processes, and tools that collectively contribute to further developing the group's understanding, approach, and quantification of ESG risk (not exhaustive):

- Business Strategy (sets guidelines for risk strategy)
- Risk Strategy (establishing targets and frameworks that address ESG risk)
- Sustainability Policy
- Credit Policy
- Liquidity Risk Policy
- Risk Report (quarterly reporting to the board)
- ICAAP (internal process for assessing risk exposure and capital needs)
- ILAAP (internal process for assessing funding and liquidity needs)
- IFRS 9 Stress Test Model for ESG Risk

In the Group's risk strategy and liquidity risk policy, indicators (targets and frameworks) related to ESG risk have been established as mentioned. These are listed in Tables 1-9 below, with references to the relevant ESRS standard and material IROs covered by the respective indicators. The targets presented are both from 2024 and for 2025. Some significant aspects identified through the Group's risk assessment processes are more challenging to quantify or are addressed in other governance documents not mentioned below.

The indicators addressing ESG risk in the risk strategy are, like indicators in other risk areas, reported quarterly to the board. In cases where one or more indicators approach the maximum risk willingness, the Group will address relevant measures to ensure that the approved risk willingness is not breached.

Table 1-9:
Targets/frameworks that set guidelines for the Group's risk willingness within ESG and the associated material ESRS standards and IROs

TARGETS/FRAMEWORKS	ESRS	MATERIAL IROS IDENTIFIED
Proportion of energy-labelled residential and commercial properties	ESRS E1	Access to ESG data Properties with low energy ratings Market value decline of collateral objects
Proportion of qualified volume for the green finance framework[1]	ESRS E1	Greenhouse gas emissions in the loan portfolio (negative) Products and services for green transition
Taxonomy-compliant residential property (2025)[2]	ESRS E1	Increase portfolio share of energy-efficient buildings Properties with low energy ratings
Taxonomy-compliant commercial property (2025)[1]	ESRS E1	Increase portfolio share of energy-efficient buildings Properties with low energy ratings
Proportion of the BM portfolio that has been scored in the ESG module	ESRS E1, S3, S4, G1, E4	Access to ESG data Climate adaptation in the credit process
Maximum volume with a low ESG score (2025)	ESRS E1, E4, S3	Lack of compliance with own ambitions Climate adaptation in the credit process
ESG requirements for parts of the concentration risk frameworks for individual industries	ESRS E1	Climate adaptation in the credit process Products and services for green transition
Gender balance in management	ESRS S1	Diversity and inclusion (positive)
Gender balance in senior professional positions	ESRS S1	Diversity and inclusion (positive)
Work environment in the group	ESRS S1	Diversity and inclusion (positive)
Proportion of the liquidity portfolio to be allocated to securities that actively address ESG	ESRS E1	Lack of compliance with own ambitions
GDPR-related losses	ESRS S4	Privacy information
Sick leave in the group	ESRS S1	Sick leave
Turnover in the group	ESRS S1, G1	Work environment and corporate culture (positive)

ESG data used to measure the aforementioned indicators is sourced from both internal and external data sources. The most central data sources are collected through the credit process performed by the first line in connection with scoring customers in the ESG module. Datasets are also distributed from SB1 Utvikling, containing information on energy ratings, estimated energy ratings, maps with physical risk on the collateral, regulatory Pillar 3 information, and a common definition of green residential and commercial properties.

The materiality assessment will be revised annually based on identified IROs in the risk management process. Indicators in the risk strategy, as well as in other governing documents, will then be adapted to the revised materiality assessment to reduce the identified risk. Internal audit, as the third line of defence, will ensure that the risk management framework is adapted to the Group's risk willingness.

1 *For the criteria that form the basis, see the Green Finance Framework: https://www.sparebank1.no/content/dam/SB1/bank/nord-norge/OmOss/baerekraft/gronne-obligasjoner/green-finance-framework-february-2024.pdf*

2 *For the criteria that form the basis, see 2.1.2 Reporting on households. The risk strategy only measures where a valid energy label is present.*

1.4.3. Coverage of ESRS Reporting Requirements

To assess which information is relevant to disclose in connection with the Group's sustainability statement, EFRAG's tool for identifying applicable disclosure requirements was used. Through this, an assessment of EFRAG's recommendations was made against the Group's material IROs. This assessment was carried out by the Group's sustainability department and summarized as follows for the material, thematic ESG standards:

- Review of mandatory disclosure requirements according to ESRS 2.
- Review of mandatory reporting on governance documents, measures, and goals.
- Review of disclosure requirements under Metrics where deemed material.
- Assessment of stakeholder engagement processes in the material social standards.
- Regardless of the materiality assessment, reporting is done according to ESRS 2 requirements, as well as IRO-1 requirements in topical standards.
- Discretionary assessment of definitions the Group had used in the assessment of IRO.

Refer to the appendices in this report for further details:

- For an overview of disclosure requirements addressed in the sustainability statement, see the ESRS index appendix.
- For an overview of where data points from other EU legislation are addressed in the sustainability statement, see the Data Points from Other EU Legislation appendix (Appendix B).

2. EU Taxonomy

The EU taxonomy is a classification system that defines which economic activities are sustainable in light of the EU's six environmental objectives. The Taxonomy Regulation (EU) 2020/852 introduces requirements for companies to report on sustainable economic activities based on these environmental objectives. The six environmental objectives are defined as:

1. Climate change mitigation
2. Climate adaptation
3. The sustainable use and protection of water and marine resources
4. The transition to a circular economy, waste prevention, and recycling
5. Pollution prevention and control
6. The protection and restoration of biodiversity and ecosystems

In the taxonomy reporting, it must be reported what proportion of the financial actor's economic activity is covered by the taxonomy (Taxonomy-Eligible). Furthermore, it must be reported how much of the economic activity is taxonomy-aligned. The European Commission sets the technical screening criteria that determine whether an economic activity is in line with the taxonomy. For an activity to be considered taxonomy-aligned, it must:

- Contribute significantly to one of the six environmental objectives in accordance with the screening criteria
- Not cause harm to the other five environmental objectives according to the DNSH (Do No Significant Harm) criteria
- Meet minimum requirements for social and governance aspects

The screening criteria for the first two climate-related environmental objectives were established in Delegated Regulation (EU) 2021/2139, known as the Climate Delegated Act. The screening criteria for the remaining four environmental objectives were established in Delegated Regulation (EU) 2023/2486, known as the Environmental Delegated Act.

From the financial year 2024, the reporting obligation under the Taxonomy Regulation has been expanded and follows the same thresholds as the Sustainability Reporting Directive (CSRD). This means that for the financial year 2024, the reporting obligation applies to public interest entities[1] that:

- Have over 500 employees, and
- Have sales revenues > MNOK or a balance sheet total > MNOK 290

For the financial year 2024, economic activities that are considered covered and aligned must be reported for environmental objectives 1 and 2. For environmental objectives 3 to 6, only economic activities that are considered covered must be reported. Economic activities that are considered aligned with environmental objectives 3 to 6 must first be reported from the financial year 2025.

[1] *Public interest entities are considered to be listed companies, banks, credit institutions, and insurance companies*

2.1 SpareBank 1 Nord-Norge's Taxonomy Reporting

For the financial year 2024, SpareBank 1 Nord-Norge reports based on the reporting template in Annex VI from Delegated Regulation (EU) 2021/2178 and its other delegated regulations (EU) 2021/2139 and (EU) 2023/2486. Additionally, the Group reports on Annex II, IV, and XII (see 2.4, as well as further reporting on templates). SpareBank 1 Nord-Norge discloses exposure to economic activities covered by the taxonomy, based on counterparties' turnover and capital expenditures (CapEx).

As of 31.12.2024, SpareBank 1 Nord-Norge has exposure to economic activities that are covered by the taxonomy (Taxonomy-eligible) based on the counterparties' reported KPIs for Turnover and CapEx.

Turnover

Based on the counterparty's reported KPIs for Turnover, the Group reports:

- MNOK 106 076 as covered, an increase of MNOK 11 462 compared to 2023 (MNOK 94 614).
- MNOK 13 878 (7.17%) as Taxonomy-aligned, an increase of MNOK 8 322 compared to 2023 (MNOK 5 556).

CapEx

Based on the counterparty's reported KPIs for CapEx, the Group reports:

- MNOK 106 275 as covered, an increase of MNOK 11 661 compared to 2023 (MNOK 94 614).
- MNOK 13 927 (7.19%) as Taxonomy-aligned, an increase of MNOK 8 371 compared to 2023 (MNOK 5 556).

The increase in the proportion of Taxonomy-aligned share in 2024 compared to 2023 is mainly due to a change in methodology, but also available data:

- **Criteria for qualifying the mortgage portfolio as green**
  The SpareBank 1 alliance has collaborated with other market participants to agree on a common methodology for the criteria that should form the basis for identifying taxonomy-aligned mortgages. A common industry standard will serve the purpose of transparent and comparable reporting of contributions to the transition. Therefore, the Group has moved away from the methodology used in 2023. For further details on methodology changes, see chapter 2.1.2. Reporting on households.
- **No Significant Harm (DNSH) Criteria for the Mortgage Portfolio**
  In 2024, Taxonomy-aligned homes flagged with chronic and acute physical risk are not excluded. This is due to a new interpretation of the DNSH criterion, which is discussed in chapter 2.1.2. In 2023, customers screened with a physical risk flag were excluded from Taxonomy-aligned activity.
- **Collection of Counterparty's Taxonomy Reporting**
  In 2024, SpareBank 1 Nord-Norge collected taxonomy reporting from financial and non-financial counterparties for the first time. The screening has resulted in the Group reporting exposure that is Taxonomy-aligned with financial and non-financial enterprises for the first time.[1] In 2024, SNN developed and improved the methodology to capture BM customers who are required to report by linking to the Brønnøysund Register Centre's shareholder register.
- **Regulatory Consolidation**
  Table 2-1 shows which companies were included in SpareBank 1 Nord-Norge's regulatory Group in 2024.

[1] *Exposure reported as covered and aligned related to financial enterprises and the corporate market portfolio can be seen in Template 1 in rows 2 and 20, respectively.*

Table 2-1: Companies included in SpareBank 1 Nord-Norge's regulatory Group in 2024

ORGANIZATION NUMBER	COMPANY	METHOD	CONSOLIDATION RATIO (%)
917143501	SpareBank 1 Bank og Regnskap AS	Equity method	25.00
919116749	Sparebank 1 Betaling AS	Equity method	17.94
924911719	SpareBank 1 Gjeldsinformasjon AS	Equity method	13.83
925239690	SpareBank 1 Forvaltning	Equity method	12.08
975966372	SpareBank 1 Gruppen AS	Equity method	19.50
986401598	SpareBank 1 Utvikling DA	Equity method	18.00
927249960	SpareBank 1 Mobilitet Holding AS	Equity method	30.66
851987142	SpareBank 1 Regnskapshuset Nord-Norge AS	Fully consolidated	100.00[1]
930050237	SpareBank 1 Finans Nord-Norge AS	Fully consolidated	100.00[1]
931262041	EiendomsMegler 1 Nord-Norge AS	Fully consolidated	100.00[1]
935491533	SpareBank 1 Nord-Norge Portefølje AS	Fully consolidated	100.00
952706365	SpareBank 1 Nord-Norge	Fully consolidated	100.00
962315666	Fredrik Langes gate 20 AS	Fully consolidated	100.00
894111232	Sparebank 1 Næringskreditt AS	Proportionally consolidated	0.58
914864445	BN Bank	Proportionally consolidated	9.99
975966453	Kredittbanken ASA	Proportionally consolidated	13.18
988738387	SpareBank 1 Boligkreditt AS	Proportionally consolidated	16.30
992999101	SpareBank 1 Markets AS	Proportionally consolidated	18.06

SpareBank 1 Nord-Norge has improved data quality in the regulatory consolidated group in Annex VI. This is because the bank has received more detailed information from affiliated companies in line with the template for financial institutions compared to the reporting year 2023. In 2024, the proportionally consolidated share of the taxonomy-aligned mortgage portfolio from BNBANK ASA is also included.[2]

Consolidated reporting is still dependent on affiliated companies providing correct and reliable data. Compared to traditional financial information reporting, the taxonomy is a new regulation that increases the risk of misreporting. Reporting from affiliated companies is currently limited to the PM portfolio, which reduces the risk of significant overestimation of the proportion of the Taxonomy-aligned portfolio.

[1] *SpareBank 1 Nord-Norge's accounting ownership share in SpareBank 1 Regnskapshuset Nord-Norge AS, SpareBank 1 Finans Nord-Norge AS, and EiendomsMegler 1 Nord-Norge AS is 85%.*

[2] *Data from BNBANK was not available at the time of reporting in 2023.*

2.1.1 Reporting on Undertakings

In the reporting of exposure to undertakings, SpareBank 1 Nord-Norge has included exposure to undertakings that are part of reporting groups. This means that the assessments are based on taxonomy information from the undertaking's closest reporting parent, often the ultimate parent company in the group. SpareBank 1 Nord-Norge has used the latest available taxonomy information about its counterparties. In cases where taxonomy information for 2024 is not available, the reporting for 2023 has been used. However, when exposure towards undertakings where previous taxonomy reporting is not available, the exposure has been assessed as not covered. When the Group has included the counterparty's KPIs, this has been done under the assumption that this reporting is accurate and reliable. This is a potential source of error in SpareBank 1 Nord-Norge's reporting on undertakings.

Exposure to Financial Undertakings

For the reporting on financial undertakings in 2024, analyses have been conducted on the bank's liquidity portfolio. The liquidity portfolio mainly consists of bonds to the state, supranationals, municipalities, and covered bonds (OMF). For 2024, reporting has exclusively been on bonds to reporting enterprises and sustainability-related bonds. Due to uncertainty and data quality, the sustainability-related bonds have been assessed as 0% aligned, as the counterparty has not reported KPIs applicable to these bonds. For covered bonds (OMF), SpareBank 1 Nord-Norge has calculated the proportion of taxonomy-aligned activity based on the counterparty's reporting in the area "of which loans collateralised by residential immovable property." For general bonds, SNN has used the counterparty's reported KPIs.

Exposure to Non-Financial Undertakings

The reporting of eligible and Taxonomy-aligned exposure is based on whether the counterparty's use of proceeds is known or not. In cases where the use of proceeds is unknown, the counterparty's general KPI is used. Screening of covered counterparties shows that the following activities in the taxonomy compass are relevant for Taxonomy-aligned activity in Turnover and CapEx:

- (CCM 6.5) Transport by motorbikes, passenger cars, and light commercial vehicles
- (CCM 6.10) Sea and coastal freight water transport, vessels for port operations, and auxiliary activities.

2.1.2 Reporting on Households

In the reporting on the Group's exposure to households, loans secured by residential properties and car loans are considered covered. None of the car loans are considered Taxonomy-aligned because electric cars do not meet the DNSH requirement related to pollution from tires. In assessing whether the mortgage portfolio is considered taxonomy-aligned, SpareBank 1 Nord-Norge has used the following criteria:

For homes built from 2021 onwards: NZEB-10%[1]

To qualify for NZEB-10%, all of the following criteria must be met:

- The construction year of the home is 2021 or later.
- The home is owned by a private individual.
- The home has a valid energy certificate from Enova.
- The home is within the threshold values for NZEB-10% (based on a valid energy label or calculated delivered energy according to the energy certificate).

The threshold values for energy labels and calculated delivered energy depend on the building type and are based on the Government's guidelines for calculating primary energy needs in buildings and energy frames for nearly zero-energy buildings. Table 2-2 shows the criteria used.

Table 2-2: Criteria Used to Qualify Homes Built from 2021 as Taxonomy-Aligned

BUILDING TYPE	QUALIFYING CRITERIA	
	ALTERNATIVE 1	ALTERNATIVE 2
Apartment The home is an apartment	• Energy Label A from Enova • Usable area of at least 150 m². This is a proxy for heated area.	Calculated Delivered Energy According to Energy Certificate ≤ 89.2 kWh per year per m² (calculated from the formula 28.9 + 67*0.9 kWh per year per m²)
Small House The home is of the type single-family house, row house, semi-detached house, agricultural property, or holiday home.	• Energy Label A from Enova	Calculated Delivered Energy According to Energy Certificate ≤ 28.9 + (76 + 1600/usable area)*0.9 kWh per year per m²

For homes built up to and including 2020: Top 15% Energy-Efficient Homes

SpareBank 1 Nord-Norge has moved away from NVE's definition of the top 15% used for 2023. The definition is used for homes where the construction year is 2020 or earlier. The Group also includes homes where the construction year is missing, assuming these are buildings constructed before 2021. The homes selected in this definition should be among the top 15% most energy-efficient homes in Norway. The Group uses Multiconsult's model to identify the relevant homes and applies the following criteria, depending on the construction year of the home:

- Construction Year 2012–2020:
  - The home type is an apartment, single-family house, row house, semi-detached house, holiday home, or agricultural property (farmer's house) and must legally qualify for TEK-10 and TEK-17.
- Construction Year Before 2012 or without construction year:
  - Valid energy certificate from Enova
  - Energy rating A or B
  - Type of housing is apartment, detached house, row house, semi-detached house, holiday home, or agricultural property (farmer's house).

Note: Based on these criteria, the energy rating of the dwelling is not considered for homes built between 2012-2020. This may result in a small number of homes registered with a lower energy rating being classified as Taxonomy-aligned based on the TEK standard. These homes are likely correctly classified as green but registered with the wrong energy rating in Enova. There may also be cases where the construction year is incorrect and the energy rating is correct, but generally, the data quality of energy ratings is weaker than that of construction years, so the chosen criterion will provide the most accurate basis.

SpareBank 1 Nord-Norge receives information about mortgage objects from Eiendomsverdi, which has an API query against Enova's register. Enova is a public register that may contain errors and omissions due to incorrect self-registration by private individuals. Self-marking of energy labels that receive a high energy rating will require increased information needs, reducing the risk of mislabeling. New homes are required to be labeled by an expert, which helps reduce the risk of mislabeling. For homes built between 2012-2020, the Group assumes that developers comply with Norwegian law and qualify for TEK-10 or TEK-17. The Group acknowledges that there may be sources of error in the registration from ENOVA for some objects, but at an overall level, it will provide an accurate level of Taxonomy-aligned residential property.

All homes that meet these criteria are also considered to be in line with DNSH. This can be explained by the fact that the entire housing portfolio has been screened by identifying all homes exposed to physical climate risk using map data. It is primarily the responsibility of the individual municipality to assess climate adaptation measures. The Group will continue to develop systems to identify whether climate adaptation measures have been implemented on the properties.

1 *(EU) 2021/2139 Annex I, section 7.7, requires that homes built from 2021 must meet the criteria in section 7.1, which specifies that the building must comply with Nearly Zero-Energy Buildings (NZEB) – 10%.*

2.2 Business strategy, product design, and interaction with customers and counterparts

SpareBank 1 Nord-Norge's risk strategy supports the Group's business strategy and sets quantitative targets within ESG risk. In the risk strategy, the Group had targets in 2024 related to the number of energy-labeled residential and commercial properties and the volume share qualified for the green finance framework (GFF). The criteria in the GFF are in line with the screening criteria for industries made available by the EU Commission, but also include criteria for other industries not yet covered by the EU taxonomy.

Furthermore, the Board decided in December 2024 to introduce targets for Taxonomy-aligned residential and commercial properties as targets applicable to the risk strategy for 2025. For 2025, a joint project is planned within the SpareBank 1 alliance to develop products for transition financing for BM customers in agriculture and commercial real estate.

2.3 Changes to reported 2023 figures

SpareBank 1 Nord-Norge acknowledges that taxonomy reporting is complex and still a new area with associated uncertainties. The Group strives to be transparent about its assessments and has gained more clarity in 2024 regarding the reporting methodology in certain areas. This means that the taxonomy reporting for 2023 has also been changed in this year's reporting:

- Taxonomy-aligned exposure to households is placed in the column 'Of which Use of proceeds'. This has also been updated for the 2023 reporting where the exposure was previously placed under 'Of which transitional'. This is due to the specification in FAQ 64 from [C/2024/6691 (third Commission Notice)].
- All exposure to cars within households is now reported as included in 'of which motor vehicle loans'.[1] This has also been updated for this year's 2023 reporting where the exposure previously only included the Group's exposure to electric cars. This means that the actual exposure in 2023 was 3 855 MNOK.

2.4 Reporting on other annexes beyond Annex VI

SpareBank 1 Nord-Norge is aware of the reporting obligation on Annex I and II for its non-financial activities, including subsidiaries Eiendomsmegler 1 Nord-Norge AS, Fredrik Langes Gate 20 AS, and Sparebank 1 Regnskapshuset Nord-Norge AS. Due to a lack of data and screening of the non-financial activities, empty reporting forms from Annex II are attached.

Additionally, the size of these companies is considered to be insignificant, and it is therefore assumed that they will have little impact on SpareBank 1 Nord-Norge's overall GAR. It may be relevant to include reporting on the annex at a later date.

[1] *This appears in row 27 for Template 1 and 3 for Turnover and CapEx.*

Due to a lack of data and screening for the Group's asset management activities (relevant for the subsidiary Sparebank 1 Nord-Norge Portefølje AS), empty reporting templates from Annex IV will be attached. It may be relevant to include reporting on the annex at a later date.

Regarding reporting on annexes beyond Annex II, IV, and VI, which will be relevant for affiliated companies and jointly controlled entities in the regulatory group, SpareBank 1 Nord-Norge still considers it unclear regarding the Group's reporting obligation. Due to a lack of data of sufficient quality, SpareBank 1 Nord-Norge has therefore chosen not to report on Annex VII and VIII for securities firms relevant to TS in the SpareBank 1 alliance (SpareBank 1 Markets AS).

With new guidelines clarifying the regulations, it may be relevant to include reporting in accordance with the annexes at a later date. SpareBank 1 Nord-Norge is aware of its reporting obligation on a consolidated KPI at the group level for taxonomy-compliant activities in the form of a weighted average of KPIs. This reporting can be seen in Table 2-3. Since the group does not have available data for taxonomy reporting on its non-financial activities and asset management, in practice, only KPIs reported in Annex VI are disclosed, and average KPIs for the group cannot be provided. Work will continue to obtain data for these companies for the 2025 reporting.

Table 2-3: SpareBank 1 Nord-Norge's reporting on the weighted average of KPIs for taxonomy-compliant activities in the group. Due to the unavailability of taxonomy information on non-financial activities and asset management, the average KPIs for the group cannot be provided.

			KPI PER BUSINESS SEGMENT			
	REVENUE[1]	PROPORTION OF TOTAL GROUP REVENUE (A)	KPI TURNOVER BASED (B)	KPI CAPEX BASED (C)	KPI TURNOVER BASED WEIGHTED (A*B)	KPI CAPEX BASED WEIGHTED (A*C)
A. Financial activities	6 031	91%				
Asset managing[2]	0	0%				
Banking activities [3]	6 031	91%	-	-	-	-
			TURNOVER KPI (B)	CAPEX KPI (C)	TURNOVER KPI WEIGHTED (A*B)	CAPEX KPI WEIGHTED (A*C)
B. Non-financial activities[4]	594	9%	-	-	-	-
Total revenue of the group	6 625	100%				
					AVERAGE KPI TURNOVER BASED	AVERAGE KPI CAPEX BASED
Average KPI of the group					-	-

[1] *By revenue, it is meant the sum of net interest income, net commission and other income, net income from financial investments.*

[2] *Sparebank 1 Nord-Norge Portefølje AS*

[3] *Sparebank 1 Nord-Norge AS (banking activities) and Sparebank 1 Finans Nord-Norge AS (leasing and chattel mortgage loans)*

[4] *Sparebank 1 Regnskapshuset Nord-Norge AS, Eiendomsmegler 1 Nord-Norge AS, and Fredrik Langes Gate 20 AS*

Disclosures according to Annex VI Template for the KPIs of credit institutions

0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation

		TOTAL ENVIRONMENTALLY SUSTAINABLE ASSETS[1]	KPI****	KPI*****	% COVERAGE (OVER TOTAL ASSETS)***	% OF ASSETS EXCLUDED FROM THE NUMERATOR OF THE GAR (ARTICLE 7(2) AND (3) AND SECTION 1.1.2. OF ANNEX V)	% OF ASSETS EXCLUDED FROM THE DENOMINATOR OF THE GAR (ARTICLE 7(1) AND SECTION 1.2.4 OF ANNEX V)
Main KPI	Green asset ratio (GAR) stock	13 878	7,17 %	7,19 %	98,01 %	31,98 %	1,99 %

		TOTAL ENVIRONMENTALLY SUSTAINABLE ASSETS	KPI[2]	KPI[2]	% COVERAGE (OVER TOTAL ASSETS)***[2]	% OF ASSETS EXCLUDED FROM THE NUMERATOR OF THE GAR (ARTICLE 7(2) AND (3) AND SECTION 1.1.2. OF ANNEX V)[2]	% OF ASSETS EXCLUDED FROM THE DENOMINATOR OF THE GAR (ARTICLE 7(1) AND SECTION 1.2.4 OF ANNEX V)[2]
Additional KPIs	GAR (flow)	3 995	4,22 %	4,22 %	96,01 %	64,05 %	3,99 %
	Trading book*						
	Financial guarantees	0	0 %	0 %			
	Assets under management	0	0 %	0 %			
	Fees and commissions income**						

* For credit institutions that do not meet the conditions of Article 94(1) of the CRR or the conditions set out in Article 325a(1) of the CRR

** Fees and commissions income from services other than lending and AuM

Instutitons shall dislcose forwardlooking information for this KPIs, including information in terms of targets, together with relevant explanations on the methodology applied.

*** % of assets covered by the KPI over banks´ total assets

**** based on the Turnover KPI of the counterparty

***** based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used

Note 1: Across the reporting templates: cells shaded in black should not be reported.

Note 2: Fees and Commissions (sheet 6) and Trading Book (sheet 7) KPIs shall only apply starting 2026. SMEs´inclusion in these KPI will only apply subject to a positive result of an impact assessment.

[1] *Based on the Turnover KPI of the counterparty as reported in row 48 of template 1 Assets for the calculation of GAR (Turnover)*

[2] *Due to insufficient data on consolidated regulatory level, this KPI only includes new loans and advances, debt securities and equity instruments not HfT from consolidated IFRS-level*

1. Assets for the calculation of GAR based on CapEx

2024

	MILLION NOK	TOTAL [GROSS] CARRYING AMOUNT	CLIMATE CHANGE MITIGATION (CCM)					CLIMATE CHANGE ADAPTATION (CCA)				WATER AND MARINE RESOURCES (WTR)				CIRCULAR ECONOMY (CE)				POLLUTION (PPC)				BIODIVERSITY AND ECOSYSTEMS (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)					OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVAN SECTORS (TAXONOMY-ELIGIBLE)				
				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)					OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)		
					OF WHICH USE OF PROCEEDS	OF WHICH TRANSITIONAL	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH USE OF PROCEEDS			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH TRANSITIONAL	OF WHICH TRANSITIONAL
	GAR - Covered assets in both numerator and denominator																															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	130 472	106 275	13 927	13 620	74	0	0	0	0	0	0				0				0				0				106 275	13 927	13 620	74	0
2	**Financial undertakings**	19 869	7 086	428	125	71	0	0	0	0	0	0				0				0				0				7 086	428	125	71	0
3	Credit institutions	19 869	7 086	428	125	71	0	0	0	0	0	0				0				0				0				7 086	428	125	71	0
4	Loans and advances	1 775	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0
5	Debt securities, including UoP	17 443	7 086	428	125	71	0	0	0	0	0	0				0				0				0				7 086	428	125	71	0
6	Equity instruments	650	0	0		0	0	0	0		0	0				0				0				0				0	0		0	0
7	Other financial corporations	0	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0
8	of which investment firms	0	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0
9	Loans and advances	0	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0
11	Equity instruments	0	0	0		0	0	0	0		0	0				0				0				0				0	0		0	0
12	of which management companies	0	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0
15	Equity instruments	0	0	0		0	0	0	0		0	0				0				0				0				0	0		0	0
16	of which insurance undertakings	0	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0
17	Loans and advances	0	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0
19	Equity instruments	0	0	0		0	0	0	0		0	0				0				0				0				0	0		0	0
20	**Non-financial undertakings**	4 499	200	8	4	3	0	0	0	0	0					0												200	8	4	3	0
21	Loans and advances	4 499	200	8	4	3	0	0	0	0	0					0												200	8	4	3	0
22	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0					0												0	0	0	0	0
23	Equity instruments	0	0	0	0	0	0																					0	0	0	0	0
24	**Households**	106 104	98 989	13 491	13 491	0	0	0	0	0	0	0				0				0				0				98 989	13 491	13 491	0	0
25	of which loans collateralised by residential immovable property	94 714	94 714	13 491	13 491	0	0	0	0	0	0	0				0				0				0				94 714	13 491	13 491	0	0
26	of which building renovation loans	0	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0
27	of which motor vehicle loans	4 275	4 275	0	0	0	0	0	0	0	0	0				0				0				0				4 275	0	0	0	0
28	**Local governments financing**	0	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0
30	Other local government financing	0	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0

1. Assets for the calculation of GAR based on CapEx

			2024																													
			CLIMATE CHANGE MITIGATION (CCM)					CLIMATE CHANGE ADAPTATION (CCA)				WATER AND MARINE RESOURCES (WTR)				CIRCULAR ECONOMY (CE)				POLLUTION (PPC)				BIODIVERSITY AND ECOSYSTEMS (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)					OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVAN SECTORS (TAXONOMY-ELIGIBLE)				
				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)					OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)			
	MILLION NOK	TOTAL [GROSS] CARRYING AMOUNT			OF WHICH USE OF PROCEEDS	OF WHICH TRANSITIONAL	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH USE OF PROCEEDS			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH TRANSITIONAL	OF WHICH TRANSITIONAL
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	63 194	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0
33	**Financial and Non-financial undertakings**	53 510																														
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	52 134																														
35	Loans and advances	41 353																														
36	of which loans collateralised by commercial immovable property	1 971																														
37	of which building renovation loans	0																														
38	Debt securities	7 003																														
39	Equity instruments	3 778																														
40	Non-EU country counterparties not subject to NFRD disclosure obligations	1 376																														
41	Loans and advances	0																														
42	Debt securities	1 368																														
43	Equity instruments	7																														
44	**Derivatives**	4 334																														
45	**On demand interbank loans**	729																														
46	**Cash and cash-related assets**	2 228																														
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	2 394																														
48	**Total GAR assets**	**193 667**	**106 275**	**13 927**	**13 620**	**74**	**0**	**0**	**0**	**0**	**0**	**0**				**0**				**0**				**0**				**106 275**	**13 927**	**13 620**	**74**	**0**
49	Assets not covered for GAR calculation	3 940																														
50	Central governments and Supranational issuers	2 521																														
51	Central banks exposure	1 419																														
52	Trading book	0																														
53	**Total assets**	**197 607**	**106 275**	**13 927**	**13 620**	**74**	**0**	**0**	**0**	**0**	**0**	**0**				**0**				**0**				**0**				**106 275**	**0**	**0**	**0**	**0**
	Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																															
54	Financial guarantees	137	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0
55	Assets under management	0	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0
56	Of which debt securities	0	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0
57	Of which equity instruments	0	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0

1. Assets for the calculation of GAR based on CapEx

			2023																													
			CLIMATE CHANGE MITIGATION (CCM)					CLIMATE CHANGE ADAPTATION (CCA)				WATER AND MARINE RESOURCES (WTR)				CIRCULAR ECONOMY (CE)				POLLUTION (PPC)				BIODIVERSITY AND ECOSYSTEMS (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)					OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVAN SECTORS (TAXONOMY-ELIGIBLE)				
				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)					OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)		
	MILLION NOK	TOTAL (GROSS) CARRYING AMOUNT			OF WHICH USE OF PROCEEDS	OF WHICH TRANSITIONAL	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH USE OF PROCEEDS			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH TRANSITIONAL	OF WHICH TRANSITIONAL
	GAR - Covered assets in both numerator and denominator																															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	125 429	94 614	5 556	5 556	0	0	0	0	0	0																	94 614	5 556	5 556	0	0
2	**Financial undertakings**	25 555	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
3	Credit institutions	21 908	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
4	Loans and advances	891	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
5	Debt securities, including UoP	19 837	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
6	Equity instruments	1 180	0	0		0	0	0	0		0																	0	0		0	0
7	Other financial corporations	3 647	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
8	of which investment firms	0	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
9	Loans and advances	1 549	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
10	Debt securities, including UoP	223	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
11	Equity instruments	1 875	0	0		0	0	0	0		0																	0	0		0	0
12	of which management companies	139	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
15	Equity instruments	139	0	0		0	0	0	0		0																	0	0		0	0
16	of which insurance undertakings	3 285	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
17	Loans and advances	1 549	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
19	Equity instruments	1 736	0	0		0	0	0	0		0																	0	0		0	0
20	**Non-financial undertakings**	854	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
21	Loans and advances	854	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
22	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
23	Equity instruments	0	0	0	0	0	0																					0	0	0	0	0
24	**Households**	99 021	94 614	5 556	5 556	0	0	0	0	0	0																	94 614	5 556	5 556	0	0
25	of which loans collateralised by residential immovable property	90 758	90 758	5 556	5 556	0	0	0	0	0	0																	90 758	5 556	5 556	0	0
26	of which building renovation loans	0	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
27	of which motor vehicle loans	3 856	3 856	0	0	0	0	0	0	0	0																	3 856	0	0	0	0
28	**Local governments financing**	0	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
30	Other local government financing	0	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0	0	0	0	0	0	0	0	0	0																	0	0	0	0	0

⟵ 1. Assets for the calculation of GAR based on CapEx

			2023																													
	MILLION NOK	TOTAL [GROSS] CARRYING AMOUNT	CLIMATE CHANGE MITIGATION (CCM)					CLIMATE CHANGE ADAPTATION (CCA)				WATER AND MARINE RESOURCES (WTR)				CIRCULAR ECONOMY (CE)				POLLUTION (PPC)				BIODIVERSITY AND ECOSYSTEMS (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)					OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVAN SECTORS (TAXONOMY-ELIGIBLE)				
				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)					OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)		
					OF WHICH USE OF PROCEEDS	OF WHICH TRANSITIONAL	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH USE OF PROCEEDS			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH TRANSITIONAL	OF WHICH TRANSITIONAL
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	52 142	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
33	**Financial and Non-financial undertakings**	46 084																														
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	46 084																														
35	Loans and advances	45 594																														
36	of which loans collateralised by commercial immovable property	0																														
37	of which building renovation loans	0																														
38	Debt securities	2																														
39	Equity instruments	488																														
40	Non-EU country counterparties not subject to NFRD disclosure obligations	0																														
41	Loans and advances	0																														
42	Debt securities	0																														
43	Equity instruments	0																														
44	**Derivatives**	2 866																														
45	**On demand interbank loans**	0																														
46	**Cash and cash-related assets**	1 527																														
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	1 665																														
48	**Total GAR assets**	**177 571**	**94 614**	**5 556**	**5 556**	**0**	**0**	**0**	**0**	**0**	**0**																	**94 614**	**5 556**	**5 556**	**0**	**0**
49	**Assets not covered for GAR calculation**	0																														
50	**Central governments and Supranational issuers**	3 925																														
51	**Central banks exposure**	420																														
52	**Trading book**	0																														
53	**Total assets**	**181 917**	**94 614**	**5 556**	**5 556**	**0**	**0**	**0**	**0**	**0**	**0**																	**94 614**	**5 556**	**5 556**	**0**	**0**
	Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																															
54	Financial guarantees	0	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
55	Assets under management	0	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
56	Of which debt securities	0	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
57	Of which equity instruments	0	0	0	0	0	0	0	0	0	0																	0	0	0	0	0

1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).

2. The following accounting categories of financial assets should be considered: Financial assets at amortised cost, financial assets at fair value through other comprehensive income, investments in subsidiaries, joint ventures and associates, financial assets designated at fair value through profit or loss and non-trading financial assets mandatorily at fair value through profit or loss, and real estate collaterals obtained by credit institutions by taking possession in exchange in of cancellation of debts.

3. Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies, and explaining the assumptions, caveats and limitations

4. For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure

1. Assets for the calculation of GAR based on Turnover

2024

	MILLION NOK	TOTAL [GROSS] CARRYING AMOUNT	CLIMATE CHANGE MITIGATION (CCM): OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)	CCM: OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)	CCM: OF WHICH USE OF PROCEEDS	CCM: OF WHICH TRANSITIONAL	CCM: OF WHICH ENABLING	CLIMATE CHANGE ADAPTATION (CCA): OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)	CCA: OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)	CCA: OF WHICH USE OF PROCEEDS	CCA: OF WHICH ENABLING
	GAR - Covered assets in both numerator and denominator										
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	130 472	106 076	13 878	13 635	71	0	0	0	0	0
2	**Financial undertakings**	19 869	7 086	387	144	71	0	0	0	0	0
3	Credit institutions	19 869	7 086	387	144	71	0	0	0	0	0
4	Loans and advances	1 775	0	0	0	0	0	0	0	0	0
5	Debt securities, including UoP	17 443	7 086	387	144	71	0	0	0	0	0
6	Equity instruments	650	0	0		0	0	0	0		0
7	Other financial corporations	0	0	0	0	0	0	0	0	0	0
8	of which investment firms	0	0	0	0	0	0	0	0	0	0
9	Loans and advances	0	0	0	0	0	0	0	0	0	0
10	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0
11	Equity instruments	0	0	0		0	0	0	0		0
12	of which management companies	0	0	0	0	0	0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0
15	Equity instruments	0	0	0		0	0	0	0		0
16	of which insurance undertakings	0	0	0	0	0	0	0	0	0	0
17	Loans and advances	0	0	0	0	0	0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0
19	Equity instruments	0	0	0		0	0	0	0		0
20	**Non-financial undertakings**	4 499	1	0	0	0	0	0	0	0	0
21	Loans and advances	4 499	1	0	0	0	0	0	0	0	0
22	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0
23	Equity instruments	0	0	0	0	0	0				
24	**Households**	106 104	98 989	13 491	13 491	0	0	0	0	0	0
25	of which loans collateralised by residential immovable property	94 714	94 714	13 491	13 491	0	0	0	0	0	0
26	of which building renovation loans	0	0	0	0	0	0	0	0	0	0
27	of which motor vehicle loans	4 275	4 275	0	0	0	0	0	0	0	0
28	**Local governments financing**	0	0	0	0	0	0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0
30	Other local government financing	0	0	0	0	0	0	0	0	0	0
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0	0	0	0	0	0	0	0	0	0

	MILLION NOK	WATER AND MARINE RESOURCES (WTR): OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)	WTR: OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)	WTR: OF WHICH USE OF PROCEEDS	WTR: OF WHICH USE OF PROCEEDS	CIRCULAR ECONOMY (CE): OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)	CE: OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)	CE: OF WHICH USE OF PROCEEDS	CE: OF WHICH ENABLING	POLLUTION (PPC): OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)	PPC: OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)	PPC: OF WHICH USE OF PROCEEDS	PPC: OF WHICH ENABLING
	GAR - Covered assets in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0				0				0			
2	**Financial undertakings**	0				0				0			
3	Credit institutions	0				0				0			
4	Loans and advances	0				0				0			
5	Debt securities, including UoP	0				0				0			
6	Equity instruments	0				0				0			
7	Other financial corporations	0				0				0			
8	of which investment firms	0				0				0			
9	Loans and advances	0				0				0			
10	Debt securities, including UoP	0				0				0			
11	Equity instruments	0				0				0			
12	of which management companies	0				0				0			
13	Loans and advances	0				0				0			
14	Debt securities, including UoP	0				0				0			
15	Equity instruments	0				0				0			
16	of which insurance undertakings	0				0				0			
17	Loans and advances	0				0				0			
18	Debt securities, including UoP	0				0				0			
19	Equity instruments	0				0				0			
20	**Non-financial undertakings**					0							
21	Loans and advances					0							
22	Debt securities, including UoP					0							
23	Equity instruments												
24	**Households**	0				0				0			
25	of which loans collateralised by residential immovable property	0				0				0			
26	of which building renovation loans	0				0				0			
27	of which motor vehicle loans	0				0				0			
28	**Local governments financing**	0				0				0			
29	Housing financing	0				0				0			
30	Other local government financing	0				0				0			
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0				0				0			

	MILLION NOK	BIODIVERSITY AND ECOSYSTEMS (BIO): OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)	BIO: OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)	BIO: OF WHICH USE OF PROCEEDS	BIO: OF WHICH ENABLING	TOTAL (CCM + CCA + WTR + CE + PPC + BIO): OF WHICH TOWARDS TAXONOMY RELEVAN SECTORS (TAXONOMY-ELIGIBLE)	TOTAL: OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)	TOTAL: OF WHICH USE OF PROCEEDS	TOTAL: OF WHICH TRANSITIONAL	TOTAL: OF WHICH TRANSITIONAL
	GAR - Covered assets in both numerator and denominator									
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0				106 076	13 878	13 635	71	0
2	**Financial undertakings**	0				7 086	387	144	71	0
3	Credit institutions	0				7 086	387	144	71	0
4	Loans and advances	0				0	0	0	0	0
5	Debt securities, including UoP	0				7 086	387	144	71	0
6	Equity instruments	0				0	0		0	0
7	Other financial corporations	0				0	0	0	0	0
8	of which investment firms	0				0	0	0	0	0
9	Loans and advances	0				0	0	0	0	0
10	Debt securities, including UoP	0				0	0	0	0	0
11	Equity instruments	0				0	0		0	0
12	of which management companies	0				0	0	0	0	0
13	Loans and advances	0				0	0	0	0	0
14	Debt securities, including UoP	0				0	0	0	0	0
15	Equity instruments	0				0	0		0	0
16	of which insurance undertakings	0				0	0	0	0	0
17	Loans and advances	0				0	0	0	0	0
18	Debt securities, including UoP	0				0	0	0	0	0
19	Equity instruments	0				0	0		0	0
20	**Non-financial undertakings**					1	0	0	0	0
21	Loans and advances					1	0	0	0	0
22	Debt securities, including UoP					0	0	0	0	0
23	Equity instruments					0	0	0	0	0
24	**Households**	0				98 989	13 491	13 491	0	0
25	of which loans collateralised by residential immovable property	0				94 714	13 491	13 491	0	0
26	of which building renovation loans	0				0	0	0	0	0
27	of which motor vehicle loans	0				4 275	0	0	0	0
28	**Local governments financing**	0				0	0	0	0	0
29	Housing financing	0				0	0	0	0	0
30	Other local government financing	0				0	0	0	0	0
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0				0	0	0	0	0

1. Assets for the calculation of GAR based on Turnover

	MILLION NOK	TOTAL [GROSS] CARRYING AMOUNT	2024																													
			CLIMATE CHANGE MITIGATION (CCM)					CLIMATE CHANGE ADAPTATION (CCA)				WATER AND MARINE RESOURCES (WTR)				CIRCULAR ECONOMY (CE)				POLLUTION (PPC)				BIODIVERSITY AND ECOSYSTEMS (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)					OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVAN SECTORS (TAXONOMY-ELIGIBLE)				
				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)					OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)			
					OF WHICH USE OF PROCEEDS	OF WHICH TRANSITIONAL	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH USE OF PROCEEDS			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH TRANSITIONAL	OF WHICH TRANSITIONAL
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	63 194	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0
33	Financial and Non-financial undertakings	53 510																														
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	52 134																														
35	Loans and advances	41 353																														
36	of which loans collateralised by commercial immovable property	1 971																														
37	of which building renovation loans	0																														
38	Debt securities	7 003																														
39	Equity instruments	3 778																														
40	Non-EU country counterparties not subject to NFRD disclosure obligations	1 376																														
41	Loans and advances	0																														
42	Debt securities	1 368																														
43	Equity instruments	7																														
44	Derivatives	4 334																														
45	On demand interbank loans	729																														
46	Cash and cash-related assets	2 228																														
47	Other categories of assets (e.g. Goodwill, commodities etc.)	2 394																														
48	**Total GAR assets**	193 667	106 076	13 878	13 635	71	0	0	0	0	0	0				0				0				0				106 076	13 878	13 635	71	0
49	Assets not covered for GAR calculation	3 940																														
50	Central governments and Supranational issuers	2 521																														
51	Central banks exposure	1 419																														
52	Trading book	0																														
53	**Total assets**	197 607	106 076	13 878	13 635	71	0	0	0	0	0	0				0				0				0				106 076	13 878	13 635	71	0
	Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																															
54	Financial guarantees	137	0	0	0	0	0	0				0				0				0				0				0	0	0	0	0
55	Assets under management	0	0	0	0	0	0	0				0				0				0				0				0	0	0	0	0
56	Of which debt securities	0	0	0	0	0	0	0				0				0				0				0				0	0	0	0	0
57	Of which equity instruments	0	0	0	0	0	0	0				0				0				0				0				0	0	0	0	0

1. Assets for the calculation of GAR based on Turnover

			2023																																	
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevan sectors (Taxonomy-eligible)				
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
Million NOK		Total [gross] carrying amount			Of which use of proceeds	Of which transitional	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which use of proceeds			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which transitional	Of which transitional
	GAR - Covered assets in both numerator and denominator																																			
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	125 429	94 614	5 556	5 556	0	0	0	0	0	0																			94 614	5 556	5 556	0	0
2	**Financial undertakings**	25 555	0	0	0	0	0	0	0	0	0																			0	0	0	0	0
3	Credit institutions	21 908	0	0	0	0	0	0	0	0	0																			0	0	0	0	0
4	Loans and advances	891	0	0	0	0	0	0	0	0	0																			0	0	0	0	0
5	Debt securities, including UoP	19 837	0	0	0	0	0	0	0	0	0																			0	0	0	0	0
6	Equity instruments	1 180	0	0		0	0	0	0		0																			0	0		0	0
7	Other financial corporations	3 647	0	0	0	0	0	0	0	0	0																			0	0	0	0	0
8	of which investment firms	0	0	0	0	0	0	0	0	0	0																			0	0	0	0	0
9	Loans and advances	1 549	0	0	0	0	0	0	0	0	0																			0	0	0	0	0
10	Debt securities, including UoP	223	0	0	0	0	0	0	0	0	0																			0	0	0	0	0
11	Equity instruments	1 875	0	0		0	0	0	0		0																			0	0		0	0
12	of which management companies	139	0	0	0	0	0	0	0	0	0																			0	0	0	0	0
13	Loans and advances	0	0	0	0	0	0	0	0	0	0																			0	0	0	0	0
14	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0																			0	0	0	0	0
15	Equity instruments	139	0	0		0	0	0	0		0																			0	0		0	0
16	of which insurance undertakings	3 285	0	0	0	0	0	0	0	0	0																			0	0	0	0	0
17	Loans and advances	1 549	0	0	0	0	0	0	0	0	0																			0	0	0	0	0
18	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0																			0	0	0	0	0
19	Equity instruments	1 736	0	0		0	0	0	0		0																			0	0		0	0
20	**Non-financial undertakings**	854	0	0	0	0	0	0	0	0	0																			0	0	0	0	0
21	Loans and advances	854	0	0	0	0	0	0	0	0	0																			0	0	0	0	0
22	Debt securities, including UoP	0	0	0	0	0	0	0	0	0	0																			0	0	0	0	0
23	Equity instruments	0	0	0	0	0	0																							0	0	0	0	0
24	**Households**	99 021	94 614	5 556	5 556	0	0	0	0	0	0																			94 614	5 556	5 556	0	0
25	of which loans collateralised by residential immovable property	90 758	90 758	5 556	5 556	0	0	0	0	0	0																			90 758	5 556	5 556	0	0
26	of which building renovation loans	0	0	0	0	0	0	0	0	0	0																			0	0	0	0	0
27	of which motor vehicle loans	3 856	3 856	0	0	0	0	0	0	0	0																			3 856	0	0	0	0
28	**Local governments financing**	0	0	0	0	0	0	0	0	0	0																			0	0	0	0	0
29	Housing financing	0	0	0	0	0	0	0	0	0	0																			0	0	0	0	0
30	Other local government financing	0	0	0	0	0	0	0	0	0	0																			0	0	0	0	0
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0	0	0	0	0	0	0	0	0	0																			0	0	0	0	0

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⟵ 1. Assets for the calculation of GAR based on Turnover

			2023																													
			CLIMATE CHANGE MITIGATION (CCM)					CLIMATE CHANGE ADAPTATION (CCA)				WATER AND MARINE RESOURCES (WTR)				CIRCULAR ECONOMY (CE)				POLLUTION (PPC)				BIODIVERSITY AND ECOSYSTEMS (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
			OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)					OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				OF WHICH TOWARDS TAXONOMY RELEVAN SECTORS (TAXONOMY-ELIGIBLE)				
				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)					OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)				OF WHICH ENVIRONMENTALLY SUSTAINABLE (TAXONOMY-ALIGNED)		
	MILLION NOK	TOTAL [GROSS] CARRYING AMOUNT			OF WHICH USE OF PROCEEDS	OF WHICH TRANSITIONAL	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH USE OF PROCEEDS			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH TRANSITIONAL	OF WHICH TRANSITIONAL
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	52 142	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
33	**Financial and Non-financial undertakings**	46 084																													
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	46 084																													
35	Loans and advances	45 594																													
36	of which loans collateralised by commercial immovable property	0																													
37	of which building renovation loans	0																													
38	Debt securities	2																													
39	Equity instruments	488																													
40	Non-EU country counterparties not subject to NFRD disclosure obligations	0																													
41	Loans and advances	0																													
42	Debt securities	0																													
43	Equity instruments	0																													
44	**Derivatives**	2 866																													
45	**On demand interbank loans**	0																													
46	**Cash and cash-related assets**	1 527																													
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	1 665																													
48	**Total GAR assets**	**177 571**	**94 614**	**5 556**	**5 556**	**0**	**0**	**0**	**0**	**0**	**0**																	**94 614**	**5 556**	**5 556**	**0**	**0**
49	**Assets not covered for GAR calculation**	0																													
50	**Central governments and Supranational issuers**	3 925																													
51	**Central banks exposure**	420																													
52	**Trading book**	0																													
53	**Total assets**	**181 917**	**94 614**	**5 556**	**5 556**	**0**	**0**	**0**	**0**	**0**	**0**																	**94 614**	**5 556**	**5 556**	**0**	**0**
	Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																															
54	Financial guarantees	0	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
55	Assets under management	0	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
56	Of which debt securities	0	0	0	0	0	0	0	0	0	0																	0	0	0	0	0
57	Of which equity instruments	0	0	0	0	0	0	0	0	0	0																	0	0	0	0	0

1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).

2. The following accounting categories of financial assets should be considered: Financial assets at amortised cost, financial assets at fair value through other comprehensive income, investments in subsidiaries, joint ventures and associates, financial assets designated at fair value through profit or loss and non-trading financial assets mandatorily at fair value through profit or loss, and real estate collaterals obtained by credit institutions by taking possession in exchange in of cancellation of debts.

3. Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies, and explaining the assumptions, caveats and limitations

4. For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure

2. GAR sector information based on CapEx

		CLIMATE CHANGE MITIGATION (CCM)				CLIMATE CHANGE ADAPTATION (CCA)				WATER AND MARINE RESOURCES (WTR)				CIRCULAR ECONOMY (CE)			
		NON-FINANCIAL CORPORATES (SUBJECT TO NFRD)		SMES AND OTHER NFC (NOT SUBJECT TO NFRD)		NON-FINANCIAL CORPORATES (SUBJECT TO NFRD)		SMES AND OTHER NFC (NOT SUBJECT TO NFRD)		NON-FINANCIAL CORPORATES (SUBJECT TO NFRD)		SMES AND OTHER NFC (NOT SUBJECT TO NFRD)		NON-FINANCIAL CORPORATES (SUBJECT TO NFRD)		SMES AND OTHER NFC (NOT SUBJECT TO NFRD)	
		[GROSS] CARRYING AMOUNT		[GROSS] CARRYING AMOUNT		[GROSS] CARRYING AMOUNT		[GROSS] CARRYING AMOUNT		[GROSS] CARRYING AMOUNT		[GROSS] CARRYING AMOUNT		[GROSS] CARRYING AMOUNT		[GROSS] CARRYING AMOUNT	
BREAKDOWN BY SECTOR - NACE 4 DIGITS LEVEL (CODE AND LABEL)		MILLION NOK	OF WHICH ENVIRONMENTALLY SUSTAINABLE (CCM)	MILLION NOK	OF WHICH ENVIRONMENTALLY SUSTAINABLE (CCM)	MILLION NOK	OF WHICH ENVIRONMENTALLY SUSTAINABLE (CCA)	MILLION NOK	OF WHICH ENVIRONMENTALLY SUSTAINABLE (CCA)	MILLION NOK	OF WHICH ENVIRONMENTALLY SUSTAINABLE (WTR)	MILLION NOK	OF WHICH ENVIRONMENTALLY SUSTAINABLE (WTR)	MILLION NOK	OF WHICH ENVIRONMENTALLY SUSTAINABLE (CE)	MILLION NOK	OF WHICH ENVIRONMENTALLY SUSTAINABLE (CE)
1	0321 - Marine aquaculture	200	8			0	0			0				0			
2	4638 - Wholesale of other food, including fish, crusta-ceans and molluscs	0	0			0	0			0				0			

		POLLUTION (PPC)				BIODIVERSITY AND ECOSYSTEMS (BIO)				TOTAL (CCM+CCA+WTR+CE+PPC+BIO)			
		NON-FINANCIAL CORPORATES (SUBJECT TO NFRD)		SMES AND OTHER NFC (NOT SUBJECT TO NFRD)		NON-FINANCIAL CORPORATES (SUBJECT TO NFRD)		SMES AND OTHER NFC (NOT SUBJECT TO NFRD)		NON-FINANCIAL CORPORATES (SUBJECT TO NFRD)		SMES AND OTHER NFC (NOT SUBJECT TO NFRD)	
		[GROSS] CARRYING AMOUNT		[GROSS] CARRYING AMOUNT		[GROSS] CARRYING AMOUNT		[GROSS] CARRYING AMOUNT		[GROSS] CARRYING AMOUNT		[GROSS] CARRYING AMOUNT	
BREAKDOWN BY SECTOR - NACE 4 DIGITS LEVEL (CODE AND LABEL)		MILLION NOK	OF WHICH ENVIRONMENTALLY SUSTAINABLE (PPC)	MILLION NOK	OF WHICH ENVIRONMENTALLY SUSTAINABLE (PPC)	MILLION NOK	OF WHICH ENVIRONMENTALLY SUSTAINABLE (BIO)	MILLION NOK	OF WHICH ENVIRONMENTALLY SUSTAINABLE (BIO)	MILLION NOK	OF WHICH ENVIRONMENTALLY SUSTAINABLE (CCM+CCA+WTR+CE+PPC+BIO)	MILLION NOK	OF WHICH ENVIRONMENTALLY SUSTAINABLE (CCM+CCA+WTR+CE+PPC+BIO)
1	0321 - Marine aquaculture	0				0				200	8		
2	4638 - Wholesale of other food, including fish, crusta-ceans and molluscs	0				0				0	0		

1. Credit institutions shall disclose in this template information on exposures in the banking book towards those sectors covered by the Taxonomy (NACE sectors 4 levels of detail), using the relevant NACE Codes on the basis of the principal activity of the counterparty

2. The counterparty NACE sector allocation shall be based exclusively on the nature of the immediate counterparty. The classification of the exposures incurred jointly by more than one obligor shall be done on the basis of the characteristics of the obligor that was the more relevant, or determinant, for the institution to grant the exposure. The distribution of jointly incurred exposures by NACE codes shall be driven by the characteristics of the more relevant or determinant obligor. Institutions shall disclose information by NACE codes with the level of disaggregation required in the template.

2. GAR sector information based on Turnover

Breakdown by sector - NACE 4 digits level (code and label)		Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)			
		Non-financial corporates (subject to NFRD)		SMEs and other NFC (not subject to NFRD)		Non-financial corporates (subject to NFRD)		SMEs and other NFC (not subject to NFRD)		Non-financial corporates (subject to NFRD)		SMEs and other NFC (not subject to NFRD)		Non-financial corporates (subject to NFRD)		SMEs and other NFC (not subject to NFRD)	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		Million NOK	Of which environmentally sustainable (CCM)	Million NOK	Of which environmentally sustainable (CCM)	Million NOK	Of which environmentally sustainable (CCA)	Million NOK	Of which environmentally sustainable (CCA)	Million NOK	Of which environmentally sustainable (WTR)	Million NOK	Of which environmentally sustainable (WTR)	Million NOK	Of which environmentally sustainable (CE)	Million NOK	Of which environmentally sustainable (CE)
1	4110 - Developement of building projects	0	0			0	0			0				0			
2	4312 - Site preparation	1	0			0	0			0				0			

Breakdown by sector - NACE 4 digits level (code and label)		Pollution (PPC)				Biodiversity and Ecosystems (BIO)				Total (CCM+CCA+WTR+CE+PPC+BIO)			
		Non-financial corporates (subject to NFRD)		SMEs and other NFC (not subject to NFRD)		Non-financial corporates (subject to NFRD)		SMEs and other NFC (not subject to NFRD)		Non-financial corporates (subject to NFRD)		SMEs and other NFC (not subject to NFRD)	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		Million NOK	Of which environmentally sustainable (PPC)	Million NOK	Of which environmentally sustainable (PPC)	Million NOK	Of which environmentally sustainable (BIO)	Million NOK	Of which environmentally sustainable (BIO)	Million NOK	Of which environmentally sustainable (CCM+CCA+WTR+CE+PPC+BIO)	Million NOK	Of which environmentally sustainable (CCM+CCA+WTR+CE+PPC+BIO)
1	4110 - Developement of building projects	0				0				0	0		
2	4312 - Site preparation	0				0				1	0		

1. Credit institutions shall disclose in this template information on exposures in the banking book towards those sectors covered by the Taxonomy (NACE sectors 4 levels of detail), using the relevant NACE Codes on the basis of the principal activity of the counterparty

2. The counterparty NACE sector allocation shall be based exclusively on the nature of the immediate counterparty. The classification of the exposures incurred jointly by more than one obligor shall be done on the basis of the characteristics of the obligor that was the more relevant, or determinant, for the institution to grant the exposure. The distribution of jointly incurred exposures by NACE codes shall be driven by the characteristics of the more relevant or determinant obligor. Institutions shall disclose information by NACE codes with the level of disaggregation required in the template.

3. GAR KPI stock based on Capex

1. Institution shall dislcose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template

2. Information on the GAR (green asset ratio of 'eligible' activities) shall be accompanied with information on the proportion of total assets covered by the GAR

3. Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmetnally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentatlly sustainable assets compared to total covered assets

4. Credit institutions shall duplicate this template for revenue based and CapEx based disclosures

		2024																														
		CLIMATE CHANGE MITIGATION (CCM)					CLIMATE CHANGE ADAPTATION (CCA)				WATER AND MARINE RESOURCES (WTR)				CIRCULAR ECONOMY (CE)				POLLUTION (PPC)				BIODIVERSITY AND ECOSYSTEMS (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
	% (COMPARED TO TOTAL COVERED ASSETS IN THE DENOMINATOR)	PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)	PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)	OF WHICH USE OF PROCEEDS	OF WHICH TRANSITIONAL	OF WHICH ENABLING	PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)	PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)	OF WHICH USE OF PROCEEDS	OF WHICH ENABLING	PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)	PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)	OF WHICH USE OF PROCEEDS	OF WHICH ENABLING	PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)	PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)	OF WHICH USE OF PROCEEDS	OF WHICH ENABLING	PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)	PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)	OF WHICH USE OF PROCEEDS	OF WHICH ENABLING	PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)	PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)	OF WHICH USE OF PROCEEDS	OF WHICH ENABLING	PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)	PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)	OF WHICH USE OF PROCEEDS	OF WHICH TRANSITIONAL	OF WHICH ENABLING	PROPORTION OF TOTAL ASSETS COVERED
	GAR - Covered assets in both numerator and denominator																															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	81,5 %	10,7 %	10,4 %	0,1 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	81,5 %	10,7 %	10,4 %	0,1 %	66,0 %
2	**Financial undertakings**	35,7 %	2,2 %	0,6 %	0,4 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	35,7 %	2,2 %	0,6 %	0,4 %	10,1 %
3	Credit institutions	35,7 %	2,2 %	0,6 %	0,4 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	35,7 %	2,2 %	0,6 %	0,4 %	10,1 %
4	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
5	Debt securities, including UoP	40,6 %	2,5 %	0,7 %	0,4 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	40,6 %	2,5 %	0,7 %	0,4 %	8,8 %
6	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %	0 %				0 %				0 %				0 %				0 %	0 %		0 %	0 %	0 %
7	Other financial corporations	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
8	of which investment firms	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
9	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
10	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
11	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %	0 %				0 %				0 %				0 %				0 %	0 %		0 %	0 %	0 %
12	of which management companies	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
13	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
14	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
15	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %	0 %				0 %				0 %				0 %				0 %	0 %		0 %	0 %	0 %
16	of which insurance undertakings	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
17	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
18	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
19	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %	0 %				0 %				0 %				0 %				0 %	0 %		0 %	0 %	0 %
20	**Non-financial undertakings**	4,4 %	0,2 %	0,1 %	0,1 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	3,9 %	1,9 %	1,3 %	5,8 %	2,3 %
21	Loans and advances	4,4 %	0,2 %	0,1 %	0,1 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	3,9 %	1,9 %	1,3 %	5,8 %	2,3 %
22	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0,0 %	0 %	0 %
23	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %	0 %				0 %				0 %				0 %				0 %	0 %		0,0 %	0 %	0 %
24	**Households**	93,3 %	12,7 %	12,7 %	0 %	0 %	0 %	0 %	0 %	0 %					0 %												0 %	13,6 %	13,6 %	0 %	0 %	53,7 %
25	of which loans collateralised by residential immovable property	100 %	14,2 %	14,2 %	0 %	0 %	0 %	0 %	0 %	0 %					0 %												0 %	14,2 %	14,2 %	0 %	0 %	47,9 %
26	of which building renovation loans	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %					0 %												0 %	0 %	0 %	0 %	0 %	0 %
27	of which motor vehicle loans	100 %	0 %	0 %	0 %	0 %																										
28	**Local governments financing**	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
29	Housing financing	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
30	Other local government financing	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
32	**Total GAR assets**	54,9 %	7,2 %	7,0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	7,2 %	7,0 %	0 %	0 %	98,0 %

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3. GAR KPI stock based on Capex

	2023																															
		CLIMATE CHANGE MITIGATION (CCM)					CLIMATE CHANGE ADAPTATION (CCA)				WATER AND MARINE RESOURCES (WTR)				CIRCULAR ECONOMY (CE)				POLLUTION (PPC)				BIODIVERSITY AND ECOSYSTEMS (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)					PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)					
			PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)					PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				
	% (COMPARED TO TOTAL COVERED ASSETS IN THE DENOMINATOR)			OF WHICH USE OF PROCEEDS	OF WHICH TRANSITIONAL	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH TRANSITIONAL	OF WHICH ENABLING	PROPORTION OF TOTAL ASSETS COVERED
	GAR - Covered assets in both numerator and denominator																															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	75,4 %	4,4 %	4,4 %	0 %	0 %	0 %	0 %	0 %	0 %																	75,4 %	4,4 %	4,4 %	0 %	0 %	68,9 %
2	**Financial undertakings**	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	14,0 %
3	Credit institutions	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	12,0 %
4	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0,5 %
5	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	10,9 %
6	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %																	0 %	0 %		0 %	0 %	0 %
7	Other financial corporations	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
8	of which investment firms	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
9	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
10	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
11	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %																	0 %	0 %		0 %	0 %	0 %
12	of which management companies	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
13	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
14	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
15	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %																	0 %	0 %		0 %	0 %	0 %
16	of which insurance undertakings	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
17	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
18	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
19	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %																	0 %	0 %		0 %	0 %	0,0 %
20	**Non-financial undertakings**	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0,5 %
21	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0,5 %
22	Debt securities, including UoP	0 %	0 %	0,0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
23	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %																	0 %	0 %		0 %	0 %	0 %
24	**Households**	95,5 %	5,6 %	5,6 %	0 %	0 %	0 %	0 %	0 %	0 %																	95,5 %	5,6 %	5,6 %	0 %	0 %	54,4 %
25	of which loans collateralised by residential immovable property	100 %	6,1 %	6,1 %	0 %	0 %	0 %	0 %	0 %	0 %																	100 %	6,1 %	6,1 %	0 %	0 %	49,9 %
26	of which building renovation loans	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
27	of which motor vehicle loans	100 %	0 %	0 %	0 %	0 %																										
28	**Local governments financing**	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
29	Housing financing	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
30	Other local government financing	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
32	**Total GAR assets**	53,3 %	3,1 %	3,1 %	0 %	0 %	0 %	0 %	0 %	0 %																	53,3 %	3,1 %	3,1 %	0 %	0 %	97,6 %

3. GAR KPI stock based on Turnover

1. Institution shall dislcose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template

2. Information on the GAR (green asset ratio of 'eligible' activities) shall be accompanied with information on the proportion of total assets covered by the GAR

3. Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmetnally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentatlly sustainable assets compared to total covered assets

4. Credit institutions shall duplicate this template for revenue based and CapEx based disclosures

2024

	% (compared to total covered assets in the denominator)	Climate change mitigation (CCM): Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	CCM: Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	CCM: Of which use of proceeds	CCM: Of which transitional	CCM: Of which enabling	Climate change adaptation (CCA): Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	CCA: Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	CCA: Of which use of proceeds	CCA: Of which enabling	Water and marine resources (WTR): Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	WTR: Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	WTR: Of which use of proceeds	WTR: Of which enabling	Circular economy (CE): Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	CE: Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	CE: Of which use of proceeds	CE: Of which enabling	Pollution (PPC): Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	PPC: Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	PPC: Of which use of proceeds	PPC: Of which enabling	Biodiversity and Ecosystems (BIO): Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	BIO: Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	BIO: Of which use of proceeds	BIO: Of which enabling	Total (CCM + CCA + WTR + CE + PPC + BIO): Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Total: Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Total: Of which use of proceeds	Total: Of which transitional	Total: Of which enabling	Proportion of total assets covered
	GAR - Covered assets in both numerator and denominator																															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	81,3 %	10,6 %	10,5 %	0,1 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	81,3 %	10,6 %	10,5 %	0 %	66,0 %
2	**Financial undertakings**	35,7 %	1,9 %	0,7 %	0,4 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	35,7 %	1,9 %	0,7 %	0 %	10,1 %
3	Credit institutions	35,7 %	1,9 %	0,7 %	0,4 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	35,7 %	1,9 %	0,7 %	0 %	10,1 %
4	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	1 %
5	Debt securities, including UoP	40,6 %	2,2 %	0,8 %	0,4 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	40,6 %	2,2 %	0,8 %	0 %	8,8 %
6	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %	0 %				0 %				0 %				0 %				0 %	0 %		0,0 %	0 %	0,3 %
7	Other financial corporations	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
8	of which investment firms	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
9	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
10	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
11	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %	0 %				0 %				0 %				0 %				0 %	0 %		0 %	0 %	0 %
12	of which management companies	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
13	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
14	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
15	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %	0 %				0 %				0 %				0 %				0 %	0 %		0 %	0 %	0 %
16	of which insurance undertakings	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
17	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
18	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
19	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %	0 %				0 %				0 %				0 %				0 %	0 %		0,0 %	0 %	0 %
20	**Non-financial undertakings**	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	3,9 %	1,9 %	1,3 %	0 %	2,3 %
21	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	3,9 %	1,9 %	1,3 %	0 %	2,3 %
22	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
23	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %	0 %				0 %				0 %				0 %				0 %	0 %		0,0 %	0 %	0 %
24	**Households**	93,3 %	12,7 %	12,7 %	0 %	0 %	0 %	0 %	0 %	0 %					0 %												0 %	13,6 %	13,6 %	0 %	0 %	53,7 %
25	of which loans collateralised by residential immovable property	100 %	14,2 %	14,2 %	0 %	0 %	0 %	0 %	0 %	0 %					0 %												0 %	14,2 %	14,2 %	0 %	0 %	47,9 %
26	of which building renovation loans	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %					0 %												0 %	0 %	0 %	0 %	0 %	0 %
27	of which motor vehicle loans	100 %	0 %	0 %	0 %	0 %																										
28	**Local governments financing**	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
29	Housing financing	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
30	Other local government financing	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
32	**Total GAR assets**	54,8 %	7,2 %	7,0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	7,2 %	7,0 %	0 %	0 %	98,0 %

→

3. GAR KPI stock Turnover

2023

	% (compared to total covered assets in the denominator)	Climate change mitigation (CCM)					Climate change adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				Total (CCM + CCA + WTR + CE + PPC + BIO)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which use of proceeds	Of which transitional	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which use of proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which use of proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which use of proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which use of proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which use of proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which use of proceeds	Of which transitional	Of which enabling	
	GAR - Covered assets in both numerator and denominator																															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	75,4 %	4,4 %	4,4 %	0 %	0 %	0 %	0 %	0 %	0 %																	75 %	4,4 %	4,4 %	0 %	0 %	68,9 %
2	**Financial undertakings**	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	14,0 %
3	Credit institutions	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	12,0 %
4	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
5	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	10,9 %
6	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %																	0 %	0 %		0 %	0 %	0 %
7	Other financial corporations	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
8	of which investment firms	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
9	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
10	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
11	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %																	0 %	0 %		0 %	0 %	0 %
12	of which management companies	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
13	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
14	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
15	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %																	0 %	0 %		0 %	0 %	0 %
16	of which insurance undertakings	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
17	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
18	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
19	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %																	0 %	0 %		0 %	0 %	0 %
20	**Non-financial undertakings**	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0,5 %
21	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0,5 %
22	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
23	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %																	0 %	0 %		0 %	0 %	0 %
24	**Households**	95,5 %	5,6 %	5,6 %	0 %	0 %	0 %	0 %	0 %	0 %																	95,5 %	5,6 %	5,6 %	0 %	0 %	54,4 %
25	of which loans collateralised by residential immovable property	100 %	6,1 %	6,1 %	0 %	0 %	0 %	0 %	0 %	0 %																	100 %	6,1 %	6,1 %	0 %	0 %	49,9 %
26	of which building renovation loans	0,0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
27	of which motor vehicle loans	100 %	0 %	0 %	0 %	0 %																										
28	**Local governments financing**	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
29	Housing financing	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
30	Other local government financing	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %																	0 %	0 %	0 %	0 %	0 %	0 %
32	**Total GAR assets**	53,3 %	3,1 %	3,1 %	0 %	0 %	0 %	0 %	0 %	0 %																	53,3 %	3,1 %	3,1 %	0 %	0 %	97,6 %

4. GAR KPI flow based on CapEx

1. Institution shall dislcose in this template the GAR KPIs on flow of loans calculated (new loans on a net basis) based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template
2. Credit institutions shall duplicate this template for revenue based and CapEx based disclosures

2024

	% (COMPARED TO TOTAL COVERED ASSETS IN THE DENOMINATOR)	CLIMATE CHANGE MITIGATION (CCM)					CLIMATE CHANGE ADAPTATION (CCA)				WATER AND MARINE RESOURCES (WTR)			
		PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)	PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)	PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)			PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)	PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)		
				OF WHICH USE OF PROCEEDS	OF WHICH TRANSITIONAL	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING
	GAR - Covered assets in both numerator and denominator													
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	8,5 %	28,7 %	28,5 %	36,2 %	0 %	0 %	0 %	0 %	0 %	0 %			
2	**Financial undertakings**	36,0 %	41,1 %	47,9 %	37,5 %	0 %	0 %	0 %	0 %	0 %	0 %			
3	Credit institutions	36,0 %	41,1 %	47,9 %	37,5 %	0 %	0 %	0 %	0 %	0 %	0 %			
4	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %			
5	Debt securities, including UoP	36,0 %	41,1 %	47,9 %	37,5 %	0 %	0 %	0 %	0 %	0 %	0 %			
6	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %	0 %			
7	Other financial corporations	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %			
8	of which investment firms	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %			
9	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %			
10	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %			
11	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %	0 %			
12	of which management companies	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %			
13	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %			
14	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %			
15	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %	0 %			
16	of which insurance undertakings	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %			
17	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %			
18	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %			
19	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %	0 %			
20	**Non-financial undertakings**	4,5 %	14,1 %	28,6 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %			
21	Loans and advances	4,5 %	14,1 %	28,6 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %			
22	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %			
23	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %	0 %			
24	**Households**	6,5 %	28,3 %	28,3 %	0 %	0 %	0 %	0 %	0 %	0 %				
25	of which loans collateralised by residential immovable property	5,1 %	28,3 %	28,3 %	0 %	0 %	0 %	0 %	0 %	0 %				
26	of which building renovation loans	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				
27	of which motor vehicle loans	37,1 %	0 %	0 %	0 %	0 %								
28	**Local governments financing**	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %			
29	Housing financing	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %			
30	Other local government financing	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %			
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %			
32	**Total GAR assets**	8,5 %	28,7 %	28,5 %	36,2 %	0 %	0 %	0 %	0 %	0 %	0 %			

	% (COMPARED TO TOTAL COVERED ASSETS IN THE DENOMINATOR)	CIRCULAR ECONOMY (CE)				POLLUTION (PPC)				BIODIVERSITY AND ECOSYSTEMS (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					PROPORTION OF TOTAL ASSETS COVERED
		PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)	PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)			PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)	PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)			PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)	PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)			PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)	PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				
				OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH TRANSITIONAL	OF WHICH ENABLING	
	GAR - Covered assets in both numerator and denominator																		
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0 %				0 %				0 %				8,5 %	28,7 %	28,5 %	36,2 %	0 %	100 %
2	**Financial undertakings**	0 %				0 %				0 %				36,0 %	41,1 %	47,9 %	37,5 %	0 %	4,4 %
3	Credit institutions	0 %				0 %				0 %				36,0 %	41,1 %	47,9 %	37,5 %	0 %	4,4 %
4	Loans and advances	0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
5	Debt securities, including UoP	0 %				0 %				0 %				36,0 %	41,1 %	47,9 %	37,5 %	0 %	4,4 %
6	Equity instruments	0 %				0 %				0 %				0 %	0 %		0 %	0 %	0 %
7	Other financial corporations	0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
8	of which investment firms	0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
9	Loans and advances	0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
10	Debt securities, including UoP	0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
11	Equity instruments	0 %				0 %				0 %				0 %	0 %		0 %	0 %	0 %
12	of which management companies	0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
13	Loans and advances	0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
14	Debt securities, including UoP	0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
15	Equity instruments	0 %				0 %				0 %				0 %	0 %		0 %	0 %	0 %
16	of which insurance undertakings	0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
17	Loans and advances	0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
18	Debt securities, including UoP	0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
19	Equity instruments	0 %				0 %				0 %				0 %	0 %		0 %	0 %	0 %
20	**Non-financial undertakings**	0 %				0 %				0 %				4,5 %	14,1 %	28,6 %	0 %	0 %	0 %
21	Loans and advances	0 %				0 %				0 %				4,5 %	14,1 %	28,6 %	0 %	0 %	0 %
22	Debt securities, including UoP	0 %				0 %				0 %				0 %	0 %	0,0 %	0 %	0 %	0 %
23	Equity instruments	0 %				0 %				0 %				0 %	0 %		0 %	0 %	0 %
24	**Households**	0 %												6,5 %	28,3 %	28,3 %	0 %	0 %	95,6 %
25	of which loans collateralised by residential immovable property	0 %												5,1 %	28,3 %	28,3 %	0 %	0 %	95,6 %
26	of which building renovation loans	0 %												0 %	0 %	0 %	0 %	0 %	0 %
27	of which motor vehicle loans													37,1 %	0 %	0 %	0 %	0 %	0 %
28	**Local governments financing**	0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
29	Housing financing	0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
30	Other local government financing	0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
32	**Total GAR assets**	0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	100 %

4. GAR KPI flow based on Turnover

1. Institution shall dislcose in this template the GAR KPIs on flow of loans calculated (new loans on a net basis) based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template
2. Credit institutions shall duplicate this template for revenue based and CapEx based disclosures

	% (COMPARED TO TOTAL COVERED ASSETS IN THE DENOMINATOR)	2024																														
		CLIMATE CHANGE MITIGATION (CCM)					CLIMATE CHANGE ADAPTATION (CCA)				WATER AND MARINE RESOURCES (WTR)				CIRCULAR ECONOMY (CE)				POLLUTION (PPC)				BIODIVERSITY AND ECOSYSTEMS (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					PROPORTION OF TOTAL ASSETS COVERED
		PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)					PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONO-MY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)					
			PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXON-OMY-ALIGNED)					PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELE-VANT SECTORS (TAXONOMY-ALIGNED)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELE-VANT SECTORS (TAXONOMY-ALIGNED)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELE-VANT SECTORS (TAXONOMY-ALIGNED)				PROPORTION OF TOTAL COVERED ASSETS FUND-ING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				
				OF WHICH USE OF PROCEEDS	OF WHICH TRANSI-TIONAL	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH TRANSI-TIONAL	OF WHICH ENABLING	
	GAR - Covered assets in both numerator and denominator																															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	8,5 %	28,8 %	28,1 %	0,2 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				8,5 %	28,8 %	28,1 %	0,2 %	0 %	100 %
2	**Financial undertakings**	36,0 %	45,4 %	20,4 %	18,6 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				36,0 %	45,4 %	20,4 %	18,6 %	0 %	4,4 %
3	Credit institutions	36,0 %	45,4 %	20,4 %	18,6 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				36,0 %	45,4 %	20,4 %	18,6 %	0 %	4,4 %
4	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
5	Debt securities, including UoP	36,0 %	45,4 %	20,4 %	18,6 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				36,0 %	45,4 %	20,4 %	18,6 %	0 %	4,4 %
6	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %	0 %				0 %				0 %				0 %				0 %	0 %		0 %	0 %	0 %
7	Other financial corporations	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
8	of which investment firms	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
9	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
10	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
11	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %	0 %				0 %				0 %				0 %				0 %	0 %		0 %	0 %	0 %
12	of which management companies	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
13	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
14	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
15	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %	0 %				0 %				0 %				0 %				0 %	0 %		0 %	0 %	0 %
16	of which insurance undertakings	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
17	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
18	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
19	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %	0 %				0 %				0 %				0 %				0 %	0 %		0 %	0 %	0 %
20	**Non-financial undertakings**	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
21	Loans and advances	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
22	Debt securities, including UoP	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
23	Equity instruments	0 %	0 %		0 %	0 %	0 %	0 %		0 %	0 %				0 %				0 %				0 %				0 %	0 %		0 %	0 %	0 %
24	**Households**	6,5 %	28,3 %	28,3 %	0 %	0 %	0 %	0 %	0 %	0 %					0 %												6,5 %	28,3 %	28,3 %	0 %	0 %	95,6 %
25	of which loans collateralised by residential immovable property	5,1 %	28,3 %	28,3 %	0 %	0 %	0 %	0 %	0 %	0 %					0 %												5,1 %	28,3 %	28,3 %	0 %	0 %	95,6 %
26	of which building renovation loans	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %					0 %												0 %	0 %	0 %	0 %	0 %	0 %
27	of which motor vehicle loans	37,1 %	0,0 %	0,0 %	0 %	0 %																					37,1 %	0 %	0 %	0 %	0 %	0 %
28	**Local governments financing**	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
29	Housing financing	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
30	Other local government financing	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				0 %	0 %	0 %	0 %	0 %	0 %
32	**Total GAR assets**	8,5 %	28,8 %	28,1 %	0,2 %	0 %	0 %	0 %	0 %	0 %	0 %				0 %				0 %				0 %				8,5 %	28,8 %	28,1 %	0,2 %	0 %	100 %

5. KPI off-balance sheet exposures stock

		2024																													
		CLIMATE CHANGE MITIGATION (CCM)					CLIMATE CHANGE ADAPTATION (CCA)				WATER AND MARINE RESOURCES (WTR)				CIRCULAR ECONOMY (CE)				POLLUTION (PPC)				BIODIVERSITY AND ECOSYSTEMS (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)					PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				
			PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)					PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)			
% (COMPARED TO TOTAL COVERED ASSETS IN THE DENOMINATOR)				OF WHICH USE OF PROCEEDS	OF WHICH TRANSITIONAL	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH TRANSITIONAL	OF WHICH ENABLING
1	Financial guarantees (FinGuar KPI)	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0
2	Assets under management (AuM KPI)	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0

1. Institution shall dislcose in this template the KPIs for off-balance sheet exposures (financial guarantees and AuM) calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template
2. Institutions shall duplicate this template to disclose stock and flow KPIs for off-balance sheet exposures

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5. KPI off-balance sheet exposures flow

		2024																													
		CLIMATE CHANGE MITIGATION (CCM)					CLIMATE CHANGE ADAPTATION (CCA)				WATER AND MARINE RESOURCES (WTR)				CIRCULAR ECONOMY (CE)				POLLUTION (PPC)				BIODIVERSITY AND ECOSYSTEMS (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)					PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ELIGIBLE)				
			PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)					PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)				PROPORTION OF TOTAL COVERED ASSETS FUNDING TAXONOMY RELEVANT SECTORS (TAXONOMY-ALIGNED)			
% (COMPARED TO TOTAL COVERED ASSETS IN THE DENOMINATOR)				OF WHICH USE OF PROCEEDS	OF WHICH TRANSITIONAL	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH ENABLING			OF WHICH USE OF PROCEEDS	OF WHICH TRANSITIONAL	OF WHICH ENABLING
1	Financial guarantees (FinGuar KPI)	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0
2	Assets under management (AuM KPI)	0	0	0	0	0	0	0	0	0	0				0				0				0				0	0	0	0	0

1. Institution shall dislcose in this template the KPIs for off-balance sheet exposures (financial guarantees and AuM) calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template
2. Institutions shall duplicate this template to disclose stock and flow KPIs for off-balance sheet exposures

Disclosures according to Annex II Templtates for the KPIs of non-financial undertakings

Template: Proportion of turnover from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2024

FINANCIAL YEAR N	YEAR			SUBSTANTIAL CONTRIBUTION CRITERIA						DNSH CRITERIA ("DOES NOT SIGNIFICANTLY HARM") (H)									
ECONOMIC ACTIVITIES (1)	"CODE (A) (2)"	TURNOVER (3)	PROPORTION OF TURNOVER, YEAR N (4)	CLIMATE CHANGE MITIGATION (5)	CLIMATE CHANGE ADAPTATION (6)	WATER (7)	POLLUTION (8)	CIRCULAR ECONOMY (9)	BIODIVERSITY (10)	CLIMATE CHANGE MITIGATION (11)	CLIMATE CHANGE ADAPTATION (12)	WATER (13)	POLLUTION (14)	CIRCULAR ECONOMY (15)	BIODIVERSITY (16)	MINIMUM SAFEGUARDS (17)	"PROPORTION OF TAXONOMY- ALIGNED (A.1.) OR -ELIGIBLE (A.2.) TURNOVER, YEAR N-1 (18)"	CATEGORY ENABLING ACTIVITY (19)	CATEGORY TRANSITIONAL ACTIVITY (20)
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Activity 1																			
Activity 1 (d)																			
Activity 2																			
Turnover of																			
Of which enabling																			
Of which transitional																			
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)																			
Activity 1 (e)																			
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)																			
A. Turnover of Taxonomy-eligible activities (A.1+A.2)																			
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
Turnover of Taxonomy- non-eligible activities																			
TOTAL			**100 %**																

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Template: Proportion of CapEx from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2024

FINANCIAL YEAR N	YEAR			SUBSTANTIAL CONTRIBUTION CRITERIA						DNSH CRITERIA ("DOES NOT SIGNIFICANTLY HARM") (H)									
ECONOMIC ACTIVITIES (1)	"CODE (A) (2)"	CAPEX(3)	PROPORTION OF CAPEX, YEAR N (4)	CLIMATE CHANGE MITIGATION (5)	CLIMATE CHANGE ADAPTATION (6)	WATER (7)	POLLUTION (8)	CIRCULAR ECONOMY (9)	BIODIVERSITY (10)	CLIMATE CHANGE MITIGATION (11)	CLIMATE CHANGE ADAPTATION (12)	WATER (13)	POLLUTION (14)	CIRCULAR ECONOMY (15)	BIODIVERSITY (16)	MINIMUM SAFEGUARDS (17)	"PROPORTION OF TAXONOMY- ALIGNED (A.1.) OR -ELIGIBLE (A.2.) CAPEX YEAR N-1 (18)"	CATEGORY ENABLING ACTIVITY (19)	CATEGORY TRANSITIONAL ACTIVITY (20)
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Activity 1																			
Activity 1 (d)																			
Activity 2																			
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)																			
Of which enabling																			
Of which transitional																			
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (g)																			
Activity 1 (e)																			
CapEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)																			
A. CapEx of Taxonomy-eligible activities (A.1+A.2)																			
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
CapEx of Taxonomy-non-eligible activities																			
TOTAL			**100 %**																

Template: Proportion of OpEx from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2024

FINANCIAL YEAR N	YEAR			SUBSTANTIAL CONTRIBUTION CRITERIA						DNSH CRITERIA ("DOES NOT SIGNIFICANTLY HARM") (H)									
ECONOMIC ACTIVITIES (1)	"CODE (A) (2)"	OPEX (3)	PROPORTION OF OPEX, YEAR N (4)	CLIMATE CHANGE MITIGATION (5)	CLIMATE CHANGE ADAPTATION (6)	WATER (7)	POLLUTION (8)	CIRCULAR ECONOMY (9)	BIODIVERSITY (10)	CLIMATE CHANGE MITIGATION (11)	CLIMATE CHANGE ADAPTATION (12)	WATER (13)	POLLUTION (14)	CIRCULAR ECONOMY (15)	BIODIVERSITY (16)	MINIMUM SAFEGUARDS (17)	"PROPORTION OF TAXONOMY- ALIGNED (A.1.) OR -ELIGIBLE (A.2.) OPEX, YEAR N-1 (18)"	CATEGORY ENABLING ACTIVITY (19)	CATEGORY TRANSITIONAL ACTIVITY (20)
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Activity 1																			
Activity 1 (*)																			
Activity 2																			
OpEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)																			
Of which enabling																			
Of which transitional																			
A.2. Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (f)																			
Activity 1 (d)																			
OpEx of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)																			
A. OpEx of Taxonomy eligible activities (A.1+A.2)																			
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
OpEx of Taxonomy-non-eligible activities																			
TOTAL			**100 %**																

→

Disclosures according to Annex IV Template for the KPI of asset managers

Standard template for the disclosure required under Article 8 of Regulation (EU) 2020/852 (asset managers)

The weighted average value of all the investments that are directed at funding, or are associated with taxonomy-aligned economic activities **relative to the value of total assets covered by the KPI**, with following weights for investments in undertakings per below: Turnover-based: % CapEx—based: %	The weighted average value of all the investments that are directed at funding, or are associated with taxonomy-aligned economic activities, with following weights for investments in undertakings per below: Turnover-based: [monetary amount] CapEx-based: [monetary amount]
The percentage of assets covered by the KPI relative to total investments (total AuM). Excluding investments in sovereign entities, Coverage ratio: %	The monetary value of assets covered by the KPI. Excluding investments in sovereign entities. Coverage: [monetary amount]
Additional, complementary disclosures: breakdown of **denominator** of the KPI	
"The percentage of derivatives relative to total assets covered by the KPI. X %"	The value in monetary amounts of derivatives:. [monetary amount]
The proportion of exposures to EU financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI: For non-financial undertakings: For financial undertakings:	Value of e**xposures to EU financial and non-financial undertakings not subject to Articles 19a and 29a of Directive 2013/34/EU**: For non-financial undertakings: [monetary amount] For financial under-takings: [monetary amount]
"The proportion of **exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU** over total assets covered by the KPI: For non-financial undertakings: For financial undertakings:"	"Value **of exposures to financial and non-financial undertakings from non-EU countries not subject to Articles 19a and 29a of Directive 2013/34/EU**: For non-financial undertakings: [monetary amount] For financial undertak-ings: [monetary amount]"
The proportion of **exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU** over total assets covered by the KPI: For non-financial undertakings: For financial undertakings:	Value of **exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU**: For non-financial undertakings: [monetary amount] For financial undertak-ings: [monetary amount]
"The proportion of **exposures to other counterparties over** total assets covered by the KPI: X %"	Value of **exposures to other counterparties**: [monetary amount]
The value of all the investments that are funding **economic activities that are not taxonomy-eligible** relative to the value of total assets covered by the KPI: X %	Value of all the investments that are funding **economic activities that are not taxonomy-eligible:** [monetary amount]
"The value of all the investments that are funding taxonomy-eligible eco-nomic activities, **but not taxonomy-aligned relative to the value of** total assets covered by the KPI: X %"	Value of all the investments that are funding Taxonomy- eligible economic activities, **but not taxonomy- aligned**: [monetary amount]
Additional, complementary disclosures: breakdown of **numerator** of the KPI	
The proportion of **Taxonomy-aligned exposures to financial and non-fi-nancial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU** over total assets covered by the KPI: For non-financial undertakings: Turnover-based: % Capital expenditures-based: % For financial undertakings: Turnover-based: % Capital expenditures-based: %	Value of **Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU:** For non-financial undertakings: Turnover-based: [monetary amount] Capital expenditures-based: [monetary amount] For financial undertakings: Turnover-based: [monetary amount] Capital expenditures-based: [monetary amount]
The proportion of **taxonomy-aligned exposures to other counterparties in** over total assets covered by the KPI: Turnover-based: % Capital expenditures-based: %	Value of **taxonomy-aligned exposures to other counterparties:** Turnover-based: [monetary amount] Capital expenditures-based: [monetary amount]

Breakdown of the numerator of the KPI per environmental objective		
Taxonomy-aligned activities –:		
(1) Climate change mitigation	Turnover: % CapEx:%	Transitional activities: A% (Turnover; CapEx) Enabling activities: B% (Turnover; CapEx)
(2) Climate change adaptation	Turnover: % CapEx:%	Transitional activities: A% (Turnover; CapEx) Enabling activities: B% (Turnover; CapEx)
(3) The sustainable use and protec-tion of water and marine resources	Turnover: % CapEx:%	Transitional activities: A% (Turnover; CapEx) Enabling activities: B% (Turnover; CapEx)
(4) The transition to a circular economy	Turnover: % CapEx:%	Transitional activities: A% (Turnover; CapEx) Enabling activities: B% (Turnover; CapEx)
(5) Pollution prevention and control	Turnover: % CapEx:%	Transitional activities: A% (Turnover; CapEx) Enabling activities: B% (Turnover; CapEx)
(6) The protection and restoration of biodiversity and ecosystems	Turnover: % CapEx:%	Transitional activities: A% (Turnover; CapEx) Enabling activities: B% (Turnover; CapEx)

Disclosures according to Annex XII

In the reporting on Annex XII (Nuclear energy and fossil gas-related activities), SpareBank 1 Nord-Norge has screened the loan portfolio against relevant NACE codes described in delegated regulation (EU) 2021/2178 and associated regulation (EU) 2022/1214. The group's loan portfolio has limited exposure to the NACE codes mentioned in the regulation, and companies with exposure do not fit the activity description in Annex 1, delegated regulation (EU) 2022/1214. Therefore, the group's reporting of Template 1 does not trigger reporting obligations for Templates 2–5.

Template 1 Nuclear and fossil gas related activities

ROW	NUCLEAR ENERGY RELATED ACTIVITIES	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
	Fossil gas related activities	
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

3. Climate change

SpareBank 1 Nord-Norge is located in the Arctic regions, where global warming has increased 3.8 times faster[1] since 1979 than in the rest of the world. Climate change affects the world in various ways, and it impacts the market area where the Group operates. The Group recognizes that its strategy and business model can have both positive and negative effects on the climate. This chapter describes how the Group works with climate change within its own operations based on the reporting standard ESRS E1 – Climate Change.

3.1 Connection to strategy and business model

In connection with the double materiality assessment in 2024, several types of impacts, risks, and opportunities arising from climate change have been identified, both for the Group and its value chain. The analysis used to identify these is based on the requirements of ESRS 1 and EFRAG's guidelines on double materiality, and addresses a company's impacts, risks, opportunities (IRO). In this chapter, the abbreviation IRO will be used to describe the impacts, risks, and opportunities identified as material for the company. In 2024, the company has identified 13 material IROs related to climate change, which are presented in Table 3-1.

Table 3–1:
The Group's material climate-related impacts, risks, and opportunities

IRO NAME	IRO CATEGORY	PLACEMENT IN VALUE CHAIN		
		UPSTREAM	OWN OPERATIONS	DOWN-STREAM
Degradation of nature and weakening of ecosystems	Negative impact			x
Climate adaptation in the credit process	Physical risk and transition risk		x	
Insurance payout for natural disasters	Physical risk	x		
Low strategic importance of sustainability	Transition risk			x
Properties with low energy ratings	Transition risk			x
Risk of failing to meet own ambitions	Transition risk		x	
Risk of lacking ESG competence in decisions	Physical risk and transition risk	x	x	
Market value decline of collateral objects	Physical risk and transition risk			x
Access to ESG data	Physical risk and transition risk	x	x	
Products and services for green transition	Opportunity		x	
Increase portfolio share of energy-efficient buildings	Opportunity		x	x

[1] The Arctic has warmed nearly four times faster than the globe since 1979 | Communications Earth & Environment (nature.com)

The world is facing significant climate-related changes and potential destruction. In addition to specific damage to nature and ecosystems, this also affects financial stability globally, and it impacts SpareBank 1 Nord-Norge's business model and ability to create value over time. This is because climate change leads to risk exposures due to physical climate changes and increased regulatory requirements for all industries to curb climate change and contribute to the transition to a low-emission society, which constitutes a transition risk. The financial sector has been identified by the EU as part of the solution to drive progress in the green shift. This includes various measures implemented to steer capital in a greener direction, in line with the Paris Agreement. Examples of such measures are the EU's directive for sustainability reporting (CSRD), the EU taxonomy, and the EU Green Bond standard. The responsibilities and opportunities associated with this have influenced SpareBank 1 Nord-Norge's business and risk strategy in recent years, with specific targets and priorities in the area.

The board of SpareBank 1 Nord-Norge has established a policy that the Group should have a business model compatible with a sustainable economy and consistent with limiting global warming in line with the Paris Agreement. This includes a long-term goal of net zero in the loan portfolio, with defined targets in the group's transition plan "The Path to Net Zero". In 2024, the group changed the end year of its long-term net zero goal for emission reductions from 2040 to 2050, based on the need to have an ambition for emission reductions that aligns with the rest of society. This will be operationalized through a revised transition plan in 2025.

The Group's double materiality assessment in 2024 identified several IROs that have a direct impact on the group's resilience and business model, including risks, opportunities, and negative impacts. The following is a detailed description of what has been identified in connection with this.

3.1.1 Negative impact

The Group recognizes that all activities and value creation can potentially have a negative impact on the climate. This applies to its own operations, financing, and other activities performed by a financial group. However, the double materiality assessment indicates that financed emissions have the most negative impact on the climate, as the Group's financing contributes to increased greenhouse gas emissions in the atmosphere. This affects the Group's business model in several ways. Increased greenhouse gas emissions can lead to more climate and environmental destruction, which in turn exposes all activities in the region to more physical climate risk. This risk particularly challenges Northern Norway due to an economy that is highly dependent on natural resources. Additionally, increased emissions in the loan portfolio are associated with increased transition risk in the form of political measures, such as elevated CO2 taxes. Through good plans for reducing greenhouse gas emissions associated with financing, the Group can reduce its negative impact on the climate, thereby also helping to reduce risk exposure for itself, its customers, and society.

The negative impact related to greenhouse gas emissions in the loan portfolio is monitored and reported quarterly to the Group management through the status of financed greenhouse gas emissions (see chapter 3.8.1).

3.1.2 Opportunities

The opportunities in the green shift for a financial group like SpareBank 1 Nord-Norge involve how the Group can contribute to the green transition and translate this into products and services for customers. To succeed, an important prerequisite for the Group is to have good customer insight in the form of ESG data. This is used both for risk management and to better understand market needs.

The opportunities identified are areas that have received increased focus for the Group and the SpareBank 1 alliance in 2024. This includes the development of frameworks and training for transition, as well as concrete business measures. A detailed description of specific actions implemented can be found in chapter 3.5 Actions.

3.1.3 Risk

Under the Climate Change standard ESRS E1, the main part of the reporting is related to the Group's exposure to climate risk. This refers to the risk of changes in the market value of the group's assets due to climate change and society's response to it. There are two main categories of risk:

- **Physical climate risk:** Includes acute and chronic risks arising from climate impacts and climate-related hazards, such as extreme weather, rising sea levels, and floods.
- **Transition risk:** Risks related to political, technological, and market responses to reduce greenhouse gas emissions. This can include changes in regulations, technological innovations, or shifts in market conditions.

Climate risk is an integral part of the group's overall risk management and internal control processes. This means that climate risk should be integrated into all elements of the group's operations, including key governing documents, processes, and systems. It should also be identified, assessed, managed, monitored, and reported in accordance with the group's internal guidelines for risk management and internal control.

Risk strategy: The board has decided that the group's risk willingness related to climate risk is low to moderate. The risk willingness is further operationalized through several quantitative metrics related to climate risk. In recent years, the risk strategy has further developed its focus on identifying and measuring climate risk, and for 2024, there are 9 different metrics. There is a particular increased focus and ambition level on the property, aquaculture, and fisheries portfolio, screening of the BM portfolio via the ESG module, as well as taxonomy green residential and commercial property. The metrics and defined risk willingness are described in more detail in chapter 1.4.2 in Table 1–9.

The business strategic goals and risk willingness within climate risk are operationalized in the following governing documents:

- **Sustainability policy:** See description in 1.2 Governance.
- **Ethical guidelines (the SNN Code):** See description in 1.2 Governance.
- **Credit approval and portfolio management:** Lending constitutes the group's core business, and the guidelines for credit approval and portfolio management are established in the governing documents for the personal market and the corporate market. The group does not finance purposes or projects that have a high risk of environmental damage, including fossil energy production, and should be cautious in financing properties with poor or weak energy ratings. Furthermore, there are industry-related requirements for climate risk assessments.
- **Liquidity management:** ESG considerations in financing are established in the policy for liquidity risk, with the goal of increasing the share of green financing.

Climate risk is identified and assessed at various levels and in connection with different processes for risk management and internal control:

- **Double materiality assessment:** See description of double materiality assessment in 1.4.
- **EU taxonomy:** See chapter 2. EU Taxonomy.
- **Green Finance Framework (GFF)**: The framework for green financing enables the group to utilize green assets.
- **ICAAP:** Through the annual comprehensive assessment of the group's risk exposure and capital needs (Internal Capital Adequacy Assessment Process, ICAAP), an evaluation of the group's overall risk exposure and capital needs is conducted. This includes future capital needs related to climate risk. The Group's climate risk exposure is assessed through climate scenarios for various industries and locations, climate risk specifically for concentrated and significant industries in the loan portfolio, as well as in the group's security portfolio.
- **Risk strategy:** In connection with determining the group's risk willingness, analyses and assessments of all significant risks, including climate risk, are conducted. The analyses are carried out over short, medium, and long time horizons.
- **Risk assessments:** According to the group's risk assessment framework, all significant decisions, including strategic decisions, investment decisions, product development, etc., must be risk-assessed so that all relevant risks are identified, assessed, and managed. Risk areas to be assessed include both initiative-independent and initiative-dependent areas. ESG risk, including explicit assessment of climate risk, is part of the mandatory initiative-independent assessment.
- **Continuous monitoring and reporting:** Continuous reporting to the board and management is carried out, where the group's risk exposure and management of climate risk are explicitly assessed. See 1.2.1.2 for a detailed description of the content of the various reports.

3.2 The Group's resilience to climate change

In the annual comprehensive assessment of the group's risk exposure and capital needs (ICAAP[1]), f an evaluation of the group's overall risk exposure and capital needs, including exposure to climate risk, is conducted. In 2024, assessments and scenario testing of climate risk in the group's loan portfolio were carried out, both for individual industries, security objects, and in relation to various scenario projections on sea level rise, storm surges, and landslides over short-, medium-, and long-term horizons. To narrow down and identify underlying significant risk drivers for climate risk, including transition and physical risk, the bank's assets are assessed both at individual and portfolio levels against, among other things:

- Share of total managed capital
- Share of total contribution to results
- Share of total scope 3 emissions
- Concentration related to geographical location

Some specific analyses and stress tests conducted on the bank's assets related to climate risk are outlined in the following.

[1] *Internal Capital Adequacy Assessment Process*

3.2.1 Projection of loan losses IFRS9 model

SpareBank1 Nord-Norge, together with the SpareBank 1 alliance's Competence Center for Credit Models (KFK), has implemented stress testing of ESG risk in the existing framework for the IFRS9 model for loan losses. The purpose of stress testing ESG is to identify customers and industries that, under various ESG scenarios, may experience an increase in expected loan losses, and thus which customers and industries the bank should have an increased ESG focus on in the future. This is intended to strengthen the banks' objective assessments of the impact of climate risk on loss provisions in the IFRS 9 model. Methodological approaches and applied scenarios are still in a test phase and will be further developed in the coming years. The model is built based on NGFS (Network of Central Banks and Supervisors for Greening the Financial System), climate research, and scenarios. NGFS is a network of central banks and supervisory authorities working for a greener financial system. The scenarios developed by NGFS are intended to provide a common basis for calculating climate risk in the financial system. The scenarios selected at the national level from NGFS are as follows:

Base case: The "Current Policy Guidelines" scenario assumes that existing policies are maintained, leading to high physical risk since no more ambitious measures are introduced. This means only current political measures are implemented, which can lead to challenges related to climate change and its subsequent impact on the environment and society. This includes irreversible changes such as higher sea level rise. A decline in property prices is also expected in this scenario. It is important to consider the long-term consequences and implement necessary measures to reduce the risk. Under this scenario, a temperature increase of 2.9 °C is expected.

Best case: The "Best Outcome" scenario is similar to the base case, as mentioned above, but without a decline in housing prices and other security values. Under this scenario, a temperature increase of 2.9 °C is expected, in line with the base case.

Fragmented world: This scenario assumes a divergent and delayed climate policy. Countries with net zero targets only partially achieve their goals (80 percent of the target), while other countries follow current policies. This scenario leads to high physical risk and high transition risk. Under this scenario, a temperature increase of 2.3 °C is expected.

Customers' ESG risk is assessed during credit approval using the ESG module (see detailed description of the module in chapter 3.9.1). Each customer's ESG score related to transition risk, from the bank's ESG module, is incorporated into the aforementioned stress test model and used to discriminate ESG-related stress at both customer and industry levels in each of the three scenarios. This means that industries and customers with a high score in the module have a lower probability of default in a specific NGFS scenario, while customers and industries with a low score in the module have a higher probability of default.

The Group uses the results from the stress testing to assess financial robustness over short, medium, and long time horizons. Additionally, the results are used in the ongoing work to identify customers, portfolios, and industries for which it is critical that the group has a clear transition strategy in the coming years. The group expects that further adjustments will need to be made during 2025 to calibrate the NGFS scenarios to Norwegian macro conditions, as well as due to any guidelines from the Financial Supervisory Authority and EBA through upcoming legal requirements and guidelines for scenario analyses and general stress testing.

3.2.2 Physical risk in the property portfolio

In addition to assessing financial robustness at the portfolio level, the Group uses map data on physical risk related to properties used as collateral for the bank's loans to both the corporate and personal markets. This data is used to assess the degree of concentration in geographical areas with elevated physical risk, which can further indicate overall exposure to collateral that may have increased risk of significant value decline in the future. The group has used this data to make changes to governing documents related to the approval process, where, for example, requirements have been established to investigate any flags on elevated physical risk before loans are granted. The data is also used to estimate potential monetary effects of natural disasters on the bank's collateral within a given geographical area in connection with ICAAP.

3.2.3 Transition risk in the property portfolio

To achieve both internal goals and the EU's targets for reduced emissions by 2030, and only zero-emission buildings from 2050 onwards, residential and commercial buildings in Northern Norway, and Norway in general, will need significant upgrades in the coming years. The Group uses data from property values that provide insight into the proportion of the property portfolio with valid energy labeling, as well as how energy-labeled securities are distributed across the respective energy label classes. In cases where official energy labels are not available, the bank also has data on estimated energy labels. These estimates are used to supplement assessments of overall exposure to transition risk in the entire property portfolio. Furthermore, annual targets for energy labeling have been implemented in the risk strategy to monitor and ensure that the portfolio moves in the right direction towards the bank's long-term zero-emission goal.

3.2.4 Transition risk on other collateral

Analyses are also conducted on the concentration of loans and associated collateral at the object and industry levels in the rest of the portfolio. This is to identify which customers and industries may be particularly exposed to transition risk and simultaneously represent a significant portion of the bank's total assets. Findings from these analyses are used in the development of policy requirements for credit approval to regulate the maximum allowable maturities for particularly exposed industries, which are assessed to have elevated transition risk in the medium and long term. The findings are also used, along with results from the IFRS9 stress test (mentioned above), to focus the Group's ongoing work on sector-specific transition plans.

3.3 Transition plan

SpareBank 1 Nord-Norge does not report on the transition plan for 2024 but plans to revise and report on it in accordance with ESRS E1 requirements during 2025.

3.4 Policies

The Sustainability Policy sets the overarching guidelines for the group's ambitions and long-term goals in the area of sustainability, and it outlines how the group's business model should be compatible with the transition to a sustainable economy and with limiting global warming in line with the Paris Agreement.

Both the risk strategy and business strategy contain specific measures for how the group works to adapt its operations to expected climate changes and reduce negative impacts on the climate. Furthermore, several governing documents aim to address these topics further. These documents handle one or more of the material IROs related to climate change (see Table 3–2).

Table 3–2:
Policies related to the material IROs associated with climate change

GOVERNANCE DOCUMENT	DESCRIPTION	RESPONSIBLE	
		OPERATIONAL	APPROVES DOCUMENT
Business Strategy	The group's strategy is built around value creation for the group's customers, society, and the group itself. Starting from 2025, "climate measures" will be defined as a strategic principle.	Everyone	Board of directors
Risk Strategy	Establishes the group's risk willingness, qualitatively and quantitatively. Own metrics related to climate and climate adaptation are reported to the board quarterly.	Chief Risk Officer	Board of directors
Sustainability Policy	Describes the overarching guidelines, principles, and long-term goals the group has within sustainability.	Chief Financial Officer	Board of directors
Credit Policy	Prioritization of market areas, industries, and exposure. Defines provisions for handling climate risk in various industries.	Executive vice president Corporate Banking	Board of directors
Governance Policy	Policy that sets guidelines for how the group should act as an owner. Contains principles regarding the handling of ESG risk, including requirements for reporting on greenhouse gas emissions and taxonomy for significant companies.	Chief Financial Officer	Board of directors
Green Finance Framework	Describes the group's requirements for loans that can be used for green financing. Contains requirements for ESG risk and energy consumption.	Chief Financial Officer	Chief Financial Officer
Green Product Framework and Transition Finance Framework	Framework developed for all banks in the SpareBank 1 Alliance that can be used for the development of green products.	Executive vice president Business Development and Technology, Executive vice president Corporate Banking	SB1 Alliance

3.5 Actions

The Group has implemented several measures to address climate change by reducing greenhouse gas emissions and carrying out climate adaptation. The various measures are linked to the IROs defined under ESRS E1 Climate Change. Reporting on implemented measures is divided into the following main categories:

1. Transparency and reporting
2. Green products and services
3. Competence

3.5.1 Transparency and reporting

Through work on sustainability reporting in accordance with CSRD, the group achieves greater transparency about its own climate footprint, as well as measures implemented to reduce greenhouse gas emissions and climate adaptation actions.

Table 3–3 provides a description of the most central actions.

Table 3–3:
Actions for transparency and reporting

DESCRIPTION OF THE MEASURE	TIME HORIZON	SCOPE AND OUTCOME
All corporate market customers >5 MNOK are scored in the ESG module.	2022 → The model is further developed annually.	The ESG module is an important tool in the transformation of the group's corporate customers. It is used in connection with credit approval to map the risk profile in the corporate market portfolio and identify the most central IROs. • The structure and composition of the module can be briefly summarized as follows: • Separate score for physical risk, transition risk, social responsibility risk, and corporate governance risk for the customer. • Inherent industry risk to reflect that industries have different starting points. • Questions that can contribute to good ranking ability are given greater weighting in the ESG score, while other questions are given lower weighting. • 12 different industry-specific modules ensure that the customer's score is based on the specific risks and opportunities of the relevant industry. In 2023, a separate KPI was established to increase the focus on integrating the model into the organization. The target was continued in 2024 with a higher level of ambition. The ambition level is also set higher for 2025, in addition to certain customers with particularly low ESG scores having to be handled at a higher decision-making level. The effect of this measure is to highlight industries' exposure to ESG risk and contribute to increasing the focus on how we should transform these customers throughout the organization.

Furthermore, the Group has implemented the following measures in 2024 with an indirect effect on reducing greenhouse gas emissions and climate change:

- A new method for climate accounting has been introduced for climate accounting 2024.
- In 2024, Samfunnsløftet offered free climate accounting to businesses, teams, and associations in Northern Norway through a collaboration with Energy.ai.
- The CEO receives quarterly reporting on financed emissions in line with the group's long-term zero-emission goals.

- Improving the quality of analysis over financed emissions. This includes contributions to Finance Norway's work on developing guidelines for reporting financed emissions in the Norwegian financial industry. The effect of this is indirect, as emission data is presented in a homogeneous manner that is easier to compare across the industry.
- The Group participates in a SINTEF project from 2024 to 2026, which aims to obtain and present climate-related data for the fishing industry. The effect of this measure is indirect, in the form of increased knowledge about greenhouse gas emissions and other sustainability conditions in the fishing industry.
- The Group, together with the SpareBank 1 Alliance, has participated in several projects related to the development of ESG data products and improving data quality in ESG reporting. The effect of this materializes through more precise climate data for use in reporting, pricing, and credit granting.

3.5.2 Green products and services

By offering customers green loans, transition products, or services in the form of climate accounting, the Group can use its influence to contribute to sustainable development. This has been identified as a unique opportunity in the Group's double materiality assessment. The opportunity relates both to specific products and services, as well as access to accurate ESG data, such as energy labels. Creating incentives for green transition through loan products can encourage more people to make green investment choices and strengthen the Group's portfolio by reducing climate risk exposure.

Table 3-4 provides a description of the most central actions.

Tabell 3–4:
Actions for green products and services

DESCRIPTION OF THE MEASURE	TIME HORIZON	SCOPE AND OUTCOME
Development of green frameworks for financing and funding. In 2024, the following have been implemented: • Revised green finance framework • Development of green product framework (SB1 Alliance) • Development of green transition framework 2025 (SB1 Alliance)	2024 →	The frameworks define the criteria that must be met to comply with taxonomy and the group's expectations for green transition. The effect of this is to create incentives for customers to make investments that demonstrably contribute to emission reductions.
Regnskapshuset SpareBank 1 Nord-Norge has established a dedicated team within sustainability advisory in 2024. The company develops services within climate accounting, transparency law, and other reporting.	2024 →	The effect of this measure is that the group can contribute to increasing knowledge in the market about how both large and small actors can steer their operations in a more sustainable direction and report correctly on their greenhouse gas emissions. There are 3 people working in this team in 2024.

Furthermore, the group has implemented the following measures in 2024 with an indirect effect on reducing greenhouse gas emissions and climate change:

- Increasing the proportion of actual energy labels in the residential and commercial property portfolio is an important measure for energy improvement. This measure also ensures better knowledge of existing risk exposure in the portfolio. The effect of this measure will lead to emission cuts in financed emissions and better data quality in calculating emissions in this part of the portfolio. Additionally, more precise data on customers' energy consumption will provide necessary insight so that the group can track energy improvement measures in the portfolio.

3.5.3 Competence

In recent years, the Group has focused on employees' competence in ESG. The right competence in sustainability is a prerequisite for succeeding with its own transition through the decisions made and for advising the market in the best possible way. This is also an important measure for handling several of the IROs defined in the group's materiality assessment.

However, the Group acknowledges that the topic is complex, and in many cases, industry- or subject-specific training is needed. It is expected that this work will need to be further developed in the coming years.

Table 3-5 provides a description of the most central actions.

Table 3–5:
Actions for competence

DESCRIPTION OF THE MEASURE	TIME HORIZON	SCOPE AND OUTCOME
Training for all employees on the group's long-term net-zero goals and transition plan.	The course has been mandatory in 2024.	Completion rate: 88 percent The effect of this is that all the group's employees will understand more about the role of a financial group in the green transition and what is required to reduce emissions in the loan portfolio.

Furthermore, the Group has implemented the following actions in 2024 with an indirect effect on reducing greenhouse gas emissions and climate change:

- Training on the use of the ESG module for corporate market advisors, with a particular focus on industry training in transport and agriculture.
- The group's scholarship scheme for its own employees has prioritized educational courses in sustainability, climate risk, and the green transition since 2022.
- The sustainability survey launched on kbnn.no is a comprehensive survey that highlights attitudes towards sustainability among residents, businesses, and municipalities in Northern Norway. The survey reveals the drivers and barriers for transition, development, priorities, and various measures.

3.5.4 Planned actions going forward

In addition to continuing measures and strengthening the climate effect of the measures mentioned in Chapter 3, the following measures are planned for 2025:

- Revise the group's transition plan in line with the reporting requirements for the transition plan in ESRS E1, and specify which tools the group has available for transition in line with the emission pathways in the transition plan.
- In 2025, the focus will be on implementing the green transition framework through products and strengthening the Group's competence in transition.

3.6 Targets

The group has adopted a target of net-zero in the loan portfolio by 2050 through its Sustainability Policy. This will be further operationalized through a transition plan during 2025. When referring to the net-zero goal, it pertains to the group's long-term goal of emission reductions. The group has not established goals related to emission reductions beyond the mentioned net-zero goal.

However, SpareBank 1 Nord-Norge has set quantitative targets related to climate-related risks and opportunities through its Risk Strategy. The specific targets are based on the group's long-term goal of emission reductions, but due to uncertainties in data quality and measurement methodology, annual calibration of the targets is planned based on new knowledge, information, or new data sources. The targets described in the Risk Strategy are not based on scientific methods but on an expectation of how much the group needs to improve the targets annually to achieve the group's long-term goal of emission reductions. Scientific-based targets have not yet been considered appropriate to measure in the Risk Strategy due to both complexity and lack of data quality. Targets that support scientific-based goals will be included in the Risk Strategy in the future where deemed relevant.

Relevant expert groups have been involved in the development of all targets. The expert groups have also made adjustments in the underlying governance documents each environment is responsible for, to address and operationalize changes made in the Risk Strategy to the organization. This applies to all targets described below, and therefore explicit stakeholder involvement is not detailed for each individual goal.

3.6.1 Target metrics risk strategy 2024

Proportion of energy-labeled residential properties: In 2024, the group aimed to increase the number of energy-labeled residential properties by a minimum of 4 percentage points, compared to the outgoing reference value from 2023. The group had a positive development in the number of labeled properties this year, particularly an increase in energy classes A and B. The target for 2024 was achieved and contributes to improved data quality for assessing the development of the portfolio towards the group's sustainability ambition.

For the 2025 target, the ambition level is increased to a 5 percentage point increase in the number of labeled residential properties, compared to the outgoing reference value from 2024.

Proportion of energy-labeled commercial properties: In 2024, the group aimed to increase the number of energy-labeled commercial properties by a minimum of 4 percentage points, compared to the outgoing reference value from 2023. The group had a positive development in the number of labeled properties this year, particularly an increase in energy classes A to D, achieving 98% of the target in 2024.

For the 2025 target, the ambition level is increased to a 5 percentage point increase in the number of labeled residential properties, compared to the outgoing reference value from 2024.

Proportion of energy-labeled residential properties A-D: In 2024, the group aimed to increase the number of energy-labeled residential properties in energy classes A-D, compared to the total number of labeled properties in energy classes A-F with the outgoing reference value from 2023. The group had a positive development in the proportion of energy classes A-D and achieved the target in 2024.

The target from 2025 has been replaced by the indicator Taxonomy-compliant residential property addressing the most energy-efficient homes.

Share of energy-labeled commercial property A-D: In 2024, the group had a goal to increase the number of energy-labeled commercial properties in energy class A-D, compared to the total number labeled in energy class A-F with the outgoing reference value from 2023. The group had a strong positive development in the share in energy class A-D and achieved the target in 2024.

The target from 2025 has been replaced by the indicator Taxonomy-compliant commercial property addressing the most energy-efficient commercial buildings.

Share of volume qualified for green finance framework (GFF): In 2024, the group had a goal to increase the share of volume that qualifies for the criteria in GFF by 5 percentage points, compared to the outgoing

reference value from 2023. The methodology in the green finance framework is under continuous development, and the bank has set stricter requirements for certain industries based on scores in the ESG module and new knowledge about market standards. The group did not achieve the target in 2024, but this was largely due to stricter criteria.

The risk indicator share qualified for the GFF criteria will continue in 2025 with a goal of a 5 percentage point increase against the outgoing reference value for 2024.

Share of the BM portfolio that has been scored in the ESG module: In 2024, the group had a goal to increase the share of BM volume scored in the ESG module by 36 percentage points, compared to the outgoing reference value from 2023. The target is intended to provide the group with increased data access to identify customers with a higher risk profile within ESG. The achievement for 2024 was 87%.

The risk indicator for the share of BM volume scored in the ESG module will continue in 2025 with a goal of a 20 percentage point increase against the outgoing volume from 2024.

Share of electric passenger cars: In 2024, the group had a goal to increase the number of approved first-time registered electric cars by 3 percentage points, compared to the outgoing reference value from 2023. The target is based on the goal of the share of electric first-time financed cars in the national transport plan. The achievement for 2024 was 86%.

The risk indicator will be removed from the group's risk strategy from 2025 but will continue to be monitored in the subsidiary's risk strategy.

ESG requirements for parts of concentration risk frameworks for specific industries: Some industry-specific concentration frameworks allow for higher growth as engagements qualify for the criteria for green transition in the GFF. The utilization of the concentration frameworks had, at the end of 2024, still significant room for taking in new green assets.

The risk indicator will continue in the group's risk strategy for 2025 and will also increase the share of the green framework for certain industries.

3.6.2 Target metrics risk strategy 2025

During 2024, the group developed and expanded the number of target metrics for ESG, based on the results in 2024 and increased focus on reporting through, among other things, CSRD. The target metrics were decided by the Board in December 2024 and will take effect from 2025 in the group's Risk Strategy. These are described in more detail below:

Share of taxonomy-compliant residential property: In 2025, the group introduced a new target metric that measures taxonomy-compliant volume for residential property against the outgoing reference value for 2024. The goal is an increase of at least 5 percentage points by the end of 2025 and aims to contribute to the group's outgoing customer initiatives to increase the share of the green portfolio.

Share of taxonomy-compliant commercial property: In 2025, the group introduced a new target metric that measures taxonomy-compliant volume for commercial property against the outgoing reference value for 2024. The goal is an increase of at least 5 percentage points by the end of 2025 and aims to contribute to the group's outgoing customer initiatives to increase the share of the green portfolio.

Maximum volume with low ESG score: The group established a new target metric in 2025 to manage the transition planning process and interaction with counterparties with elevated ESG risk (low ESG score). The volume of customers scored with high ESG risk in the ESG module will need to be decided at a higher decision-making level, given that thresholds for engagement size are actualized. The volume of customers with a low ESG score can increase by a maximum of 3.5 percentage points compared to the outgoing reference value from 2024. The group has an overarching goal of net zero emissions in the loan portfolio by 2050.

3.6.3 The Group's long-term net zero emissions target

The group's long-term goal for emission reductions is set to net zero emissions in the loan portfolio by 2050. This is to have a goal in line with national targets in accordance with the Paris Agreement and the Norwegian Climate Goals Act. The goal is set with a reference value for 2024. The goal will be further operationalized during 2025 through a transition plan in line with the requirements in ESRS E1.

3.7 Energy consumption and mix

The group's energy consumption related to its own activities distributed by energy sources can be seen in Table 3-6. The energy consumption includes the group's use of fuel, electricity, and district heating. The distribution between energy sources is based on the market-based method for electricity. For district heating, the energy source distribution has been calculated based on the energy source distribution of district heating in Tromsø and on SSB 10513 Waste Account.

Table 3-6:
The Group's Energy Consumption Distributed by Energy Sources

ENERGY SOURCES	ENERGY CONSUMPTION (MWh)
Fossil sources	1 196.36
Nuclear power	72.23
Renewable sources	3 221.06
Total	4 489.65

3.8 Greenhouse gas accounting

SpareBank 1 Nord-Norge's greenhouse gas accounting for 2024 is prepared in accordance with the reporting requirements in ESRS and the GHG protocol. The greenhouse gas accounting is an overview of the group's emissions distributed across various categories and covers emissions from all companies included in the accounting group. This includes the following companies:

- SpareBank 1 Nord-Norge AS
- Eiendomsmegler 1 Nord-Norge AS
- Fredrik Langes Gate 20 AS
- Sparebank 1 Regnskapshuset Nord-Norge AS
- Sparebank 1 Finans Nord-Norge AS
- Sparebank 1 Nord-Norge Portefølje AS

The group's operational emissions are calculated based on either physical data or economic data, and Asplan Viak AS has assisted the group in this work. Physical data is directly related to the activity that generates the greenhouse gas emissions (e.g., the number of liters of gasoline consumed) and is therefore considered to be of high quality. Economic data is accounting data that is further linked to sector-specific emission factors in Asplan Viak AS's Klimakost model to estimate emissions. For more information, see the appendix Calculation Methodology for Operational Emissions. The greenhouse gas accounting includes three main categories:

- **Scope 1:** These are direct greenhouse gas emissions from sources that SpareBank 1 Nord-Norge owns or controls. Emissions reported in Scope 1 come from the group's three company cars. The emissions are calculated based on physical data on fuel consumption.
- **Scope 2:** These are indirect emissions from the production of electricity, heating, and cooling that SpareBank 1 Nord-Norge purchases to operate the group's offices and premises. Emissions reported in Scope 2 come from the group's consumption of electricity and district heating and are mainly calculated based on physical data on kWh.
- **Scope 3:** These are all other indirect emissions caused in the group's value chain. Scope 3 consists of 15 categories, and SpareBank 1 Nord-Norge reports on emissions in 9 of these. The reported emissions come, for example, from the production of purchased goods and services, employees' business travel, and the group's financing activities. An overview of the included and excluded Scope 3 categories can be seen in Table 3-7.

The group's Scope 3 emissions are calculated using different methodologies depending on the emission category. The methodology for upstream emissions reported in categories 1-8 includes a combination of physical and economic data. For the group's downstream emissions reported in categories 13 and 15, different data has been used depending on availability. See 3.8.1 Financed Emissions for more information.

Table 3-7: Overview of included and excluded Scope 3 categories in the group's greenhouse gas accounting

SCOPE 3 CATEGORIES	INCL./EXCL.	COMMENT
1 Purchased Goods and Services	Included	Based on the costs the group has associated with the purchase of goods and services.
2 Capital Goods	Included	Based on this year's investments, such as the purchase of buildings and office furniture.
3 Fuel- and Energy-Related Activities (not included in Scope 1 and Scope 2)	Included	Based on emissions associated with fuel and energy consumption that are not reported in Scope 1 and Scope 2.
4 Upstream Transportation and Distribution	Included	Based on the costs the group has associated with postage/shipping.
5 Waste Generated from Operations	Included	Based on the costs the group has associated with waste management.
6 Business Travel	Included	Based on physical data and costs associated with the group's travel activities.
7 Employee Commuting	Excluded	The group does not collect data on how employees travel to the workplace.
8 Upstream Leased Assets	Included	Based on the costs the group has associated with renting premises, machinery/equipment, transportation vehicles, and parking.
9 Downstream Transportation and Distribution	Excluded	The group uses transportation very limitedly in connection with the sale of its products.
10 Processing of Sold Products	Excluded	The group does not cause processing emissions as it does not sell physical products but is a service provider.
11 Use of Sold Products	Excluded	The group does not cause emissions related to the use of its services as it does not offer physical products but is a service provider.
12 End-of-Life Treatment of Sold Products	Excluded	The group does not sell products that require waste treatment.
13 Downstream Leased Assets	Included	Emissions are based on object level for motorized vehicles; there is no methodology to calculate emissions from other leased assets.
14 Franchises	Excluded	The group does not engage in franchise operations.
15 Investments	Included	Emissions caused by the group through its loans, as well as its ownership stake in alliance companies.

Table 3-8: Greenhouse gas accounting of SpareBank 1 Nord-Norge

	RETROSPECTIVE			
	BASE YEAR 2024	COMPARATIVE 2023[1]	REPORTING YEAR 2024	% 2024/2023[1]
Scope 1 GHG emissions				
Gross Scope 1 GHG emissions (tCO_2e)	6		6	
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)				
Scope 2 GHG emissions				
Gross location-based Scope 2 GHG emissions (tCO_2e)	242		242	
Gross market-based Scope 2 GHG emissions (tCO_2e)	574		574	
Significant Scope 3 GHG emissions				
Total Gross indirect (Scope 3) GHG emissions (location-based) (tCO_2e)	1 669 243		1 669 243	
1 Purchased goods and services	12 119		12 119	
2 Capital goods	901		901	
3 Fuel and energy-related activities (not included in Scope 1 or Scope 2) (location-based)	48		48	
4 Upstream transportation and distribution	95		95	
5 Waste generated in operations	14		14	
6 Business traveling	1 193		1 193	
8 Upstream leased assets	863		863	
13 Downstream leased assets	27 649		27 649	
15 Investments (location-based)	1 626 362		1 626 362	
of which Alliance companies[2]	1 031 847		1 031 847	
of which financed emissions	594 515		594 515	
Total GHG emissions				
Total GHG emissions (location-based) (tCO_2e)	1 669 491		1 669 491	
Total GHG emissions (market-based) (tCO_2e)	1 669 823		1 669 823	

[1] *2024 is the first year SpareBank 1 Nord-Norge reports according to ESRS and comparative figures for the previous year are therefore not disclosed in accordance with ESRS 1 § 136.*

[2] *This was changed by the board on April 7 2025 from 642 712 tCO2e to 1 031 847 tCO_2e*

The emission intensity in terms of total greenhouse gas emissions per net income is calculated to be 158,02 tCO2eq/MNOK for the location-based method and 158,05 tCO2eq/MNOK for the market-based method. The largest emission category in the group is category 15 Investments. This consists of two items:

1. **Emissions from Alliance Companies**
   SpareBank 1 Nord-Norge has included emissions from associated companies and joint ventures considered significant where the group does not have operational control. The emissions were included in SpareBank 1 Nord-Norge's greenhouse gas accounting by multiplying the companies' total location-based emissions by the group's ownership share in the respective companies. The materiality assessment of the various companies was made based on a common agreement in the SpareBank 1 alliance.
2. **The Group's Financed Emissions**
   SpareBank 1 Nord-Norge has included the financed emissions the group has through its loans and bonds. Table 3-8 includes location-based financed emissions calculated for the portfolio's Scope 1 and Scope 2. For a more detailed description of the methodology and further details and breakdown, see 3.8.1.

3.8.1 Financed emissions

The Group's financed emissions are calculated based on the methods of PCAF (Partnership for Carbon Accounting Financials), supplemented with recommendations from Finance Norway's guide for calculating financed emissions[2]. Financed emissions are reported in accordance with the GHG protocol, under scope 3 category 15. The analysis covers several industries in the loan portfolio, with the aim of covering as large a share of loans as possible based on available data and methods.

PCAF recommends a set of different methods for various asset classes based on available data and data quality. The data quality ranges from 1 to 5, with data quality 1 being the highest quality and 5 being the lowest.

Data Quality Hierarchy:

- 1: Verified greenhouse gas accounting at the customer level
- 2: Unverified greenhouse gas accounting at the customer level
- 3: Calculations based on activity data from the customer
- 4 and 5: Calculations based on factors for broader industry groupings

There is continuous work to improve the quality of the calculation of financed emissions to better understand the impacts and risks associated with the group's lending activities. Table 3-9 shows the group's financed emissions as of 31.12.2024.

[1] *Net income is calculated as the sum of interest income, commission income, other income, and net income from financial investments from the Annual Accounts - Income Statement.*

[2] *https://www.finansnorge.no/dokumenter/maler-og-veiledere/veileder-for-beregning-av-finansierte-klimagassutslipp/*

Table 3-9: The Group's financed emissions broken down by sectors with corresponding data quality

ASSET CLASSES	MNOK	SCOPE 1+2 (tCO$_2$e)	SCOPE 3 (tCO$_2$e)	TOTAL EMISSIONS (tCO$_2$e)	DATA QUALITY (1-5 SCALE WHERE 1 IS THE BEST)	
					SCOPE 1+2	SCOPE 3
Loans broken down by sector						
Agriculture, forestry and fishing	12 358	411 898	286 411	698 310	3.68	4.02
Mining and quarrying	7	970	455	1 425	4.47	4.47
Manufacturing	1 920	31 813	89 591	121 404	4.05	4.05
Electricity, gas, steam and air conditioning supply	2 110	32 284	3 914	36 198	2.86	4.00
Water supply, sewerage, waste managment and remediation activities	159	4 652	2 401	7 053	4.09	4.09
Construction	2 626	6 656	78 149	84 805	4.32	4.32
Wholesale and retail trade, repair of motor vehicles and motorcycles	1 522	5 863	31 953	37 816	4.28	4.28
Transporting and storage	3 538	68 291	38 045	106 336	4.30	4.30
Accommodation and food service activities	778	1 570	8 558	10 129	4.17	4.17
Information and communication	97	243	630	872	4.70	4.70
Financial and insurance activities	1 251	283	1 599	1 882	4.33	4.33
Real estate activities						
- Location-based	19 369	4 166	8 051	12 217	3.66	4.94
- Market-based	19 369	155 593	8 051	163 645	3.66	4.94
Professional, scientific and technical activities	1 050	477	2 410	2 887	4.24	4.24
Commercial service provision	641	4 701	4 110	8 811	4.46	4.46
Public administration and defense, and social security schemes subject to public administration	428	652	1 373	2 025	5.00	5.00
Education	172	463	975	1 438	4.78	4.78
Human health and social work activities	392	1 049	2 208	3 256	4.63	4.63
Arts, entertainment and recreation	457	1 044	2 197	3 241	4.44	4.44
Other services activities	416	878	1 988	2 866	4.52	4.52
Activities of households as employers; undifferentiated goods - and services - producing activities of households for own use	0	0	0	0	5.00	5.00
Total loans Corporate market (location-based)	**49 292**	**577 953**	**565 017**	**1 142 971**	**-**	**-**
Total loans Corporate market (market-based)	**49 292**	**729 381**	**565 017**	**1 294 398**	**-**	**-**
Total loans Retail market (location-based)	**91 402**	**15 616**	*****	**15 616**	**3,08**	**-**
Total loans Retail market (market-based)	**91 402**	**555 955**	*****	**555 955**	**3,08**	**-**
Total bonds	**11 218**	**945**	**2 620**	**3 565**	**3,43**	**3,43**
Total financed emission (location-based)	**151 912**	**594 515**	**567 637**	**1 162 152**		
Total financed emissions (market-based)	**151 912**	**1 286 281**	**565 017**	**1 851 298**		

** The current emission methodology does not calculate Scope 3 emissions for mortgages within the personal market.*

Below is a description of the methodology used for certain industries.

3.8.1.1 PROPERTY

Several data sources are used to calculate financed emissions from the bank's loans to residential and commercial properties, reported under Real Estate Sales and Operations and the personal market. Information about the individual property guides which methods are used. Energy label/estimated energy label gives PCAF data quality 3. In the absence of an energy label, information about building type and area can be used to estimate emissions from the property. This gives data quality 4 or 5. Property types such as garages and undeveloped land are not included. Emissions are also not calculated where the group does not have sufficient information about the property type. Information about emissions related to different building types is obtained from PCAF's database.

The group reports, in accordance with the GHG protocol, on estimates based on market-based emission factors for electricity and location-based emission factors for electricity. The allocation factor for the building's emissions is defined as the outstanding exposure to the building divided by the original value of the building. This is multiplied by the building's emissions to obtain the group's financed emissions associated with loans to the building.

3.8.1.2 AGRICULTURE

To estimate emissions from active agricultural customers, activity data at the customer level is used. The activity data distinguishes between different animals and types of land at the customer. Emission factors from the Platon report "Greenhouse Gas Emissions from Norwegian Agriculture Distributed by Area, Animals, and Food Production" are combined with the activity data to estimate the customer's emissions. The emission factors are conveyed through Finance Norway's guide for calculating financed emissions. The factors describe emissions from agriculture, energy use, and land use. Agricultural customers not included in this part of the analysis will have their emissions calculated as mortgage customers.

3.8.1.3 AQUACULTURE

The group has aquaculture customers engaged in various production forms of salmon, including broodstock, smolt, and food fish. SpareBank 1 Nord-Norge also has indirect exposure to aquaculture companies in group structures where loans are not given to the aquaculture company but to its parent company. In some cases, the parent company/borrower also engages in aquaculture itself, while in other cases, it does not engage in aquaculture, for example, by being a holding company. In cases where SpareBank 1 Nord-Norge has exposure to such group structures, emissions are calculated for the group's aquaculture activities.

Based on Finance Norway's emissions guide, emissions from smolt and food fish production are estimated based on the customers' production volume. The group has obtained the customers' production volume. Customers with broodstock production are excluded and included in the category Remaining BM Customers as there is no specific methodology for calculating emissions from this production form.

3.8.1.4 MOTORIZED VEHICLES

For the first time, the group includes emissions from loans and leasing of motorized vehicles.[1] The method covers both loans and leasing to private individuals and corporate customers specified for the purchase of vehicles. According to the GHG protocol, leasing should be reported under scope 3 category 13. The group follows the recommendation of Finance Norway's guide and calculates emissions from leasing in the same way as loans. This method has been clarified with PCAF. The calculation includes scope 1 and scope 2 emissions from vehicles, depending on whether the vehicle is powered by fuel combustion or electricity. The scope 1 emission is calculated from "Tank-to-wheel" and only considers the combustion of the fuel, not the production and distribution of the fuel.

To estimate emissions from motorized vehicles, vehicle-specific emission factors combined with average mileage at the vehicle type level are used. Vehicle-specific emission factors can be found in the motor vehicle register or PCAF's vehicle database. Where vehicle-specific information is not available, average factors for vehicle groups from PCAF's database are used.

[1] *Not included: "Tractor", "Snowmobile", "Light Tractor", "Moped", "Motorcycle", "Four-Wheeled Motorcycle", "Moped Car", "Motor Equipment"*

3.8.1.5 REMAINING CM CUSTOMERS

Remaining customers in the corporate market have their emissions calculated based on either their self-reported emissions (data quality 1 or 2) or based on their NACE code and emission factors from PCAF's database (Exiobase) with data quality 4 or 5 based on available financial data from the Brønnøysundregistrene. If data is available in the Brønnøysundregistrene, the calculation gets data quality 4. If financial data is not available, the emission is estimated with an emission factor corresponding to data quality 5. Customers who have had their emissions calculated in the other described industries are excluded here.

3.9 Financial effects from climate risk and opportunities

3.9.1 Assessment of ESG in credit approval

Requirements and expectations from supervisory authorities and other stakeholders related to the quantification of ESG risk have increased in 2024, and it is expected that they will increase further in the coming years. The group has several important incentives for credit assessing corporate market customers:

- Increasing requirements for precision and level of detail in regulatory reporting
- Achieving a more accurate risk profile of customers
- Identifying opportunities and threats in the business strategy based on the current portfolio
- Access to green financing
- Contributing to green transition in the region
- Access to ESG data

In 2023, the group implemented the new ESG module for credit approvals in the corporate market. See chapter 3.8 for more information about the module.

Customers' ESG risk must always be assessed during credit approval. This requirement is stated in the group's Credit Approval Policy. In addition, a risk classification must be carried out using the ESG module for all corporate market customers with exposure over 5 million kroner.

So far, customers with a total volume of 35.4 billion kroner have been scored in the ESG module. This represents 61 percent of the total corporate market portfolio with loan exposure over 5 million kroner. The summary of the results is presented in the table below, showing that 52 percent of the volume has been scored with low risk, 46 percent of the volume with moderate risk, and 2 percent of the volume with high risk. Scoring of ESG risk is a relatively new model in the SpareBank 1 alliance, and the model's predictive ability will be continuously developed in line with changing framework conditions.

Table 3–10: Overall quantification of score

RISK LEVEL	NUMBER OF CORPORATE MARKET CUSTOMERS	VOLUME (MNOK)	AVERAGE TOTAL SCORE (0-10)
Low	185	18 514	7.5
Moderate	430	16 399	5.0
High	15	538	2.9
Total	**630**	**35 452**	**5.7**

By using the ESG module, the group is in the process of achieving a representative data sample of customers within certain industries. This can be used in further work to map opportunities and threats within the respective industries. The customers' scores from the ESG module will also be incorporated into the framework for stress testing ESG risk in the upcoming ICAAP process. This can help the group in its work to:

- Identify significant concentrations of credit exposure to carbon-related assets.
- Identify any geographical concentrations for physical risk.
- Identify which industries the group needs to intensify efforts towards to contribute to the transition.
- Adjust any values of financial securities with particular ESG risk.
- Identify the group's robustness in various ESG scenarios.
- Implement measures in governing documents to manage and transition customers with particularly high ESG risk.

3.9.2 Physical risk

3.9.2.1 EXPOSURE OF THE PROPERTY PORTFOLIO TO PHYSICAL RISK

Good assessments of the group's risk exposure over a long-time horizon are challenged by data availability and quality, and uncertainty related to predicting outcomes over a longer time horizon. Northern Norway is characterized by rugged terrain and coastal communities and is therefore particularly vulnerable to sea level rise and storm surges. The group has access to map data from NVE and Kartverket, which Eiendomsverdi has linked to residential and commercial properties at the object level. Eiendomsverdi has developed a risk score for the various physical risk scenarios as well as an overall risk score for physical risk. The score ranges from 0 to 6, with a risk score of 6 being the highest risk. The score is mainly based on the degree of impact on the property, as well as the likelihood of the various scenarios occurring. The overall risk score is set equal to the highest risk score for the various scenarios.

In connection with the risk mapping, the group has created data points for all collateral objects with liens, including properties transferred to SpareBank 1 Boligkreditt or SpareBank 1 Næringskreditt, with assigned loan balances and hits on various hazard levels and scenarios for physical risk. The map layers identify risks for storm surges, sea level rise, floods, rockslides/mountain slides/quick clay slides, as well as the likelihood of surface water. The most central risk types are further divided into acute risk and chronic risk (Figure 3.1). For a residential property to qualify as acute or chronic risk, the score must be at least categorized as level 3. Objects can be affected by multiple map layers, and some objects may therefore be affected by multiple risk types.

Figure 3.1: Acute and chronic risk distributed by segment (Loan volume distributed by security MNOK)

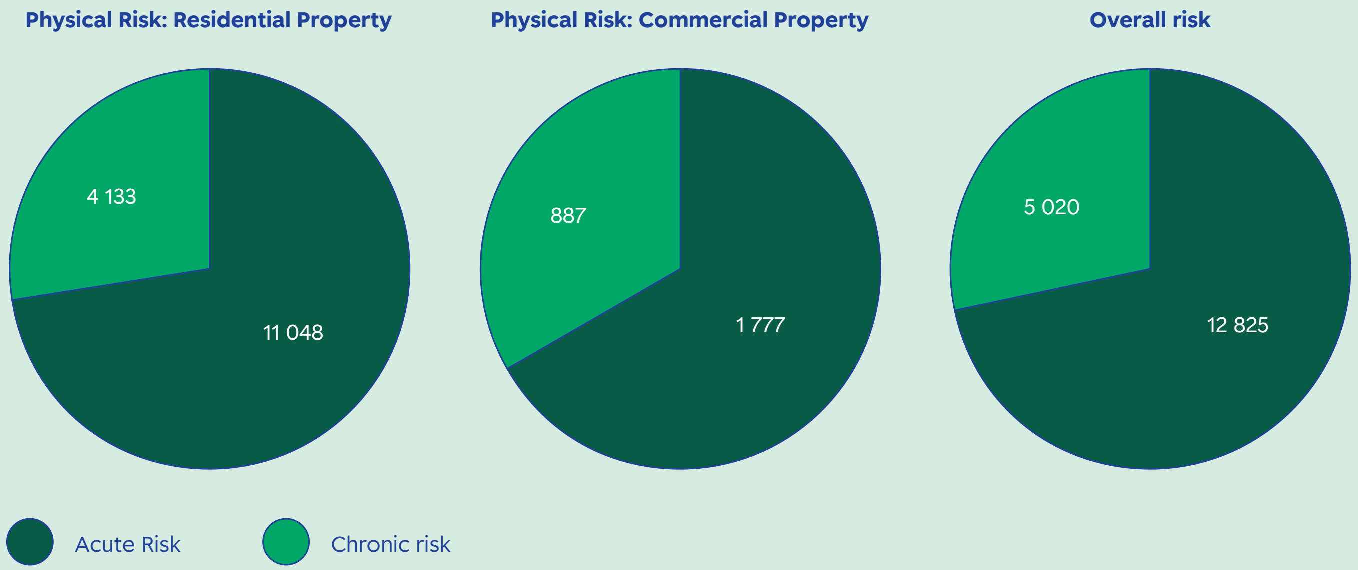


Figure 3.2: Acute and Chronic risk distributed by risk score (MNOK)

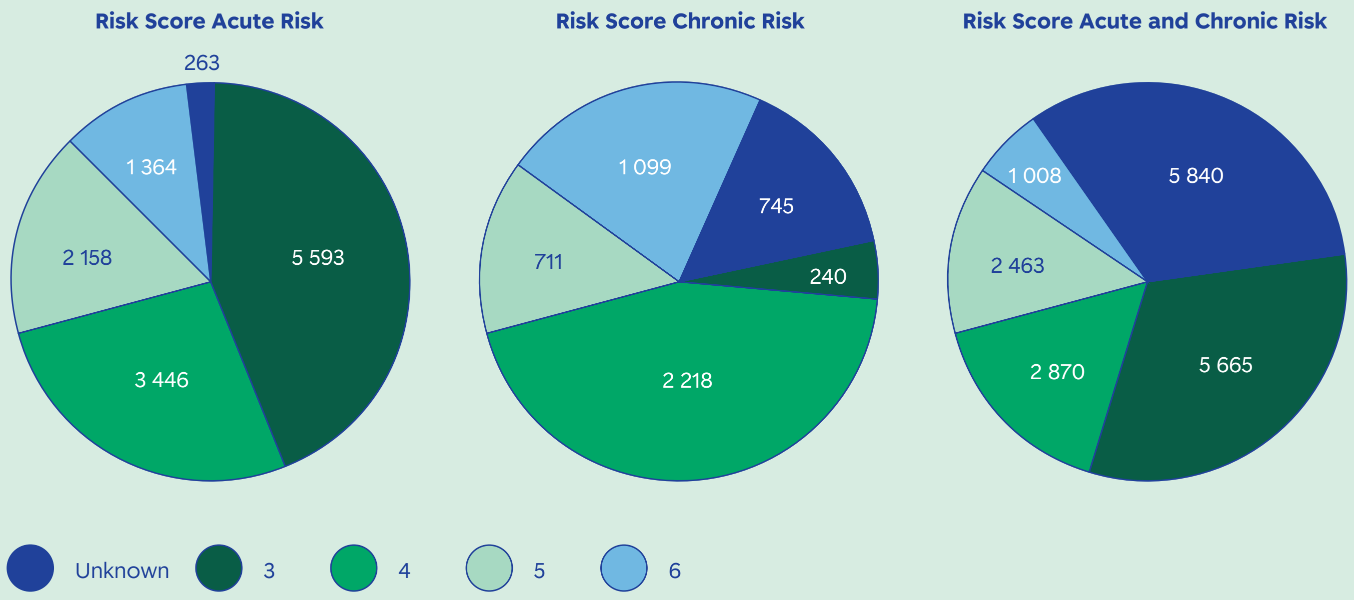
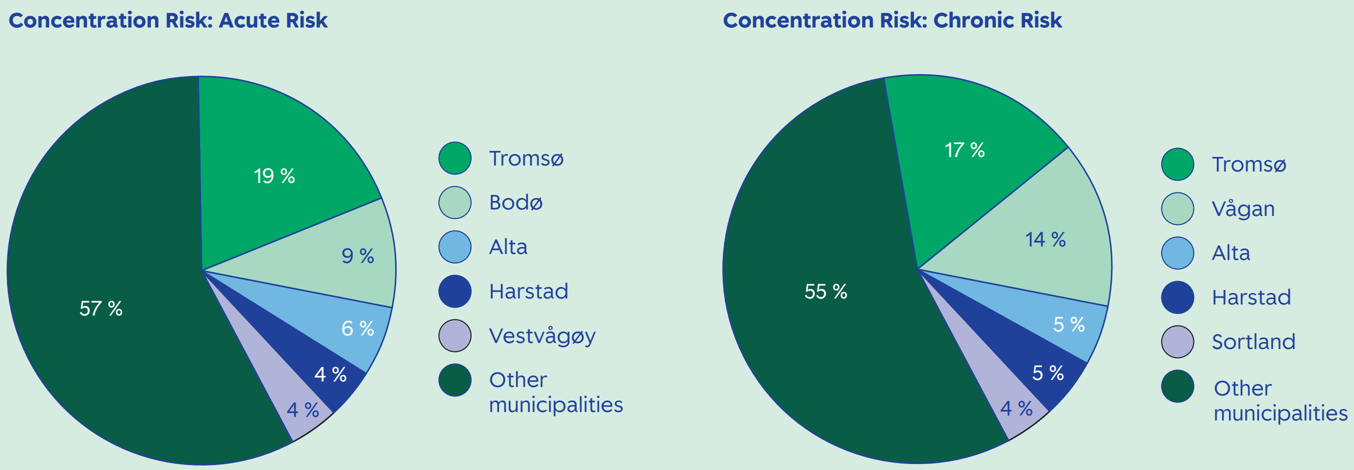


Figure 3.3: Geographic exposure to acute and chronic risk



3.9.2.2 ACUTE CLIMATE RISK

Acute climate risk is the risk of damage or loss due to extreme weather events such as storms, floods, land-slides, and droughts. These events can be exacerbated by climate change and have negative consequences for nature, society, and the economy. To reduce acute climate risk, it is important to map the vulnerability of various sectors, regions, and businesses, and implement measures that increase resilience and preparedness. In NORADAPT's survey of climate ranking of Norwegian municipalities in 2023[1] , Northern Norway was ranked poorly due to being highly exposed and having low adaptation to physical risk. The survey did not observe any correlation between how exposed Norwegian municipalities are and the extent of their efforts for climate adaptation. Acute climate risk consists of many different risk types, which have varying probabilities and severity when triggered. New in 2024 is that data regarding exposure to surface water, as well as quantification of score, is included in the assessment of acute climate risk.

Analyses of the most central map layers within acute physical risk show that the group's collateral objects collectively have an exposure of 17.8 billion NOK at the end of 2024. This represents a total of 14.7 % of the loan balance for all security objects the group has exposure to. The exposure to acute climate risk constitutes 14.9% of the total PB portfolio and 13.9 % of the total CB portfolio.

Risk classification of acute risk is distributed on a score from 0-6, where properties that hit risk score 3-6 for the risk categories; flood, landslide, quick clay, and surface water are included in acute climate risk (Figure 3.2). The risk score is set based on the variables' probability and consequence, but there is no data available on whether risk mitigation measures have been taken on the properties. This needs to be mapped and documented in the customer dialogue. The risk categories rockslide and surface water have the highest exposure within risk score 5 and 6 and are therefore the risk types with the highest probability and consequence. The risk type surface water has the clearly highest total risk exposure in risk score 3-6. Surface water damage is compensated according to insurance agreements and is normally not covered by the Natural Damage Act.

The geographic exposure to acute climate risk is greatest in the cities where the group has the highest loan exposure. None of these cities are particularly exposed when calculating the share of total loans in the municipality. Tromsø, Bodø, Alta, and Harstad have the highest density of property and make up a large part of the exposure to surface water. However, it is observed that some areas in Nordland and Finnmark are highly exposed when the calculated share of exposure of total loans in the municipality is taken into account. Vestvågøy, Kautokeino, and Fauske stand out particularly negatively. This overall risk picture is considered to reflect a relatively well-differentiated geographic risk distribution from the south of the country to Northern Norway (Figure 3.3). A larger geographic spread, as the property portfolio is distributed in Northern Norway, reduces the economic risk in the event of acute incidents.

3.9.2.3 CHRONIC CLIMATE RISK

Chronic climate risk is the risk of damage or loss due to long-term changes in the climate, which can affect nature, society, and the economy. Increased sea temperatures and melting glaciers increase the risk of sea level rise along the Norwegian coast, which can threaten coastal areas, islands, cities, and infrastructure with flooding, erosion, and saltwater intrusion. Analyses of the most central map layers within chronic physical risk show that the group's collateral objects collectively have a loan exposure of 5 billion NOK at the end of 2024. This represents 4.1 percent of the total loan balance on the collateral objects the group has exposure to. The exposure to chronic climate risk constitutes 4.1 percent of the total PB portfolio and 4.6 percent of the CB portfolio.

Risk classification of chronic risk is distributed on a score from 0-6, where properties that hit risk score 3-6 for sea level rise and storm surge under various scenarios. Scenarios have been developed for mean high water, 20-, 200-, and 1000-year storm surge for sea level today (current scenario), in 2050, and in 2090. In the climate projection for 2090, the 8.5 Representative Concentration Pathways (RCP) scenario is used. Future scenarios take into account land uplift and other processes that affect sea level locally. The scenarios are relevant for spatial planning, construction cases, climate adaptation, and work with societal security and preparedness.

The scenarios with sea level rise towards 2050 show that the 20-year storm surge and 200-year storm surge have the greatest impact on the properties in the portfolio. Expected sea level rise towards 2090 is expected to further negatively affect the main buildings on the exposed properties compared to the other mentioned scenarios.

[1] https://storymaps.arcgis.com/stories/712e9c04b6184795ae2f2bebde03f67d

The geographic exposure is concentrated towards coastal municipalities with the densest development. This includes the municipalities of Tromsø, Bodø, Alta, and Harstad. This is because residential and commercial properties have traditionally been built in connection with coastal infrastructure. According to the report "Sea-Level Rise and Extremes in Norway," several factors favour Norway when assessing exposure and vulnerability to extreme weather along the coast. The coast is generally steep and rocky, and land uplift after the last ice age counteracts sea level rise. Unlike many other coastal nations, Norway has so far experienced little of the consequences of sea level rise.

It is specified in the upcoming CRR3 [fotnote: Capital Requirements Regulation] regulations that ESG assessment of physical risk should be taken into account when updating the valuation of collateral objects. This can, through a potential increase in LTV [fotnote: Loan to Value (the size of the loan commitment divided by the market value of the collateral)], also negatively affect the risk weights in the bank's loan portfolio. There have been no recorded cases where security values have been adjusted downwards due to high physical risk, but an increased degree of extreme weather is expected to increase the focus on physical risk and climate adaptation. Physical risk is primarily an insurance risk in the short and medium term, but can also materialize in higher insurance costs, maintenance costs, and changed market demand in the long term.

3.9.2.4 INSURANCE RISK

The group is directly exposed to natural risk from weather-related events that cause a decrease in the value of borrowers' collateral objects, as well as through the insurance company Fremtind Forsikring. The company is part of the SpareBank1 Gruppen, where SpareBank1 Nord-Norge owns 19.5%. Damage events resulting from heavy rain, floods, extreme melting, heat waves, drought, bare frost, landslides, avalanches, and extreme weather are increasingly affecting insurance companies.

Norway is a country with both coastline, mountains, lakes, and rivers. The climate and natural events affect different parts of the country differently, but the coast is hardest hit by both storms and storm surges. Figures from Finans Norge and Norsk Naturskadepool show that Nordland is among the counties hardest hit by natural and weather damage. Nordland has both a high number of cases and a high average compensation amount per natural damage. This is because large parts of the residential and commercial property mass are located close to the coast. Weather events related to storms occur relatively frequently in Nordland. In Troms and Finnmark, the number of events is somewhat lower, but storms also represent the most significant damage in these counties. Events resulting from landslides, floods, and storm surges do not occur frequently, but cause significant damage when they do occur.

All insurance companies that sell fire insurance are members of Norsk Naturskadepool, where the natural damage insurance premium is a percentage rate of the fire insurance sum. Currently, the rate is 0.070 per mille. From 2025, major changes will be introduced in the natural damage insurance regulations, which will require established market players to take on a larger share of the risk during a transition period. One of the major changes involves the establishment of a fund for the management of natural damage capital, and the fund will be placed and managed by Norsk Naturskadepool. Insurance companies that have accumulated natural damage capital in years with deficits will first have to draw from their natural damage capital to cover the deficit. For newer players, they will be able to benefit from the fund's new capital in deficit years during the transition period, so they do not have to cover upcoming deficits with earned equity from previous years. This means that Fremtind Forsikring and the other larger market players will have to bear a larger share of the risk exposure until the fund reaches a value of 4 billion NOK and the transition period ends.

Although the natural damage insurance scheme covers a large share of the payouts from natural damage, there are several damage events that fall outside or may result in reductions. The policyholder is obliged to prevent or limit the extent of damage themselves. This involves maintaining property and/or assets so that they do not deteriorate over time. The current principle of solidarity in the natural damage scheme is under pressure. Several large insurance companies have expressed a desire for the current natural damage scheme to be replaced by a scheme that gives each insurance company greater freedom to set the price themselves and to abolish the scheme. This would mean that each company could determine how much the price supplement should be for buildings exposed to floods, storms, or landslides. Residential and commercial buildings in exposed areas could receive very high insurance premiums or no insurance offer at all. This could affect the market value and sales time of affected buildings and properties.

Although current insurance schemes are based on solidarity, there will be an increased risk of "stranded assets" due to objects in exposed areas. To mitigate the risk of "stranded assets," the group has acquired map layers that identify various scenarios of physical risk for the property portfolio. The group has implemented measures and requirements in the credit approval policy to reduce the risk of "stranded assets." It is specified in the bank's credit approval policy that the bank should be cautious about financing homes that are exposed to high physical climate risk, and that "the bank should refrain from financing objects exposed to climate risk where insurance coverage is not possible." Furthermore, "the customer's exposure to climate risk, where applicable, should be assessed, documented, and used as a basis for the credit decision."

The group SpareBank 1's largest risk exposures are related to life insurance and non-life insurance activities. The risk associated with insurance activities arises from uncertainty related to the frequency and size of payouts relative to the companies' revenues. The insurance premium is also invested to generate returns, which leads to financial exposure to market risk. The insurance portfolios in Fremtind Forsikring, which is 65 percent owned by SpareBank 1 Gruppen, are considered to be relatively well-diversified through a large number of customers, spread across different geographical areas, and in several different products. In Norway, the concentration risk in non-life insurance and exposure to natural risk is limited due to participation in the previously mentioned Norsk Naturskadepool.

After the merger with Eika Forsikring AS, Fremtind Forsikring has a market share equivalent to 18.8 percent for land-based Norwegian non-life insurance. The current solidarity scheme has led Fremtind Forsikring to build up solid natural damage reserves, and analyses of recent years' insurance payouts from the Naturskadepool indicate no significant insurance risk due to ownership in Fremtind Forsikring in the short and medium term. However, the long-term effects of chronic physical risk, combined with an increasing degree of extreme weather, are highly uncertain. In the long term, this could challenge the pricing and profitability of insurance companies. This could again lead to higher volatility in profitability for the insurance industry, including the integrated profit effects in the group due to the profitability of SpareBank 1 Gruppen. The insurance risk in SpareBank 1 Gruppen is mainly an ownership risk for the group, which is managed through the ownership risk policy, ownership governance policy, board representation, as well as specific targets and frameworks in the risk strategy, including risk limits for the largest engagement and for total ownership risk exposure. These measures are intended to ensure that exposures to associated companies will remain manageable in the future.

3.9.2.5 THE ESG MODULE

Physical risk is a separate underlying risk category, with various industry-specific questions in the ESG module. It is also adjusted for the inherent risk of the industry the customer belongs to. The expected effect of physical risk is, as anticipated, highest in the primary industries of agriculture and fisheries, which are particularly dependent on nature. Other industries are expected to be less affected by physical risk. The average total score for physical risk, except for agriculture, is significantly higher compared to the average total score for all industries. This indicates that there are other risk types, beyond physical risk, which constitute the greatest ESG risk. Customer dialogue around physical risk should help the group gain an overview of risk exposure, as well as documentation of where measures have been taken to reduce the risk. The dialogue should also help illuminate the customer's risk level both in the short, medium, and long term. The use of, and dialogue with the customer about the results from the module, can also help increase the general knowledge level around ESG risk among Northern Norwegian companies. This will be critical to achieving real transition in the region.

Table 3-11: ESG-score physical risk

INDUSTRY	NUMBER OF CUSTOMERS	VOLUME (MNOK)	SCORED PHYSICAL RISK (0–10), AFTER INHERENT ADJUSTMENT	AVERAGE TOTAL SCORE (0–10)
Commercial property	233	9 688	8,3	5.1
Fisheries	71	7 011	6,7	4.8
Industry and others	143	6 216	8,2	6.7
Aquaculture	16	3 967	7,7	7.3
Property projects	39	2 105	8,8	5.8
Power production (renewable)	9	2 038	10	7.8
Shipping	13	1 805	10	6.7
Transport	5	1 048	10	6.1
Machinery and construction contractors	28	732	10	5.3
Agriculture	47	481	6,2	6.1
Housing cooperatives	26	361	8,1	5.2
Total	**630**	**35 452**	**IA**	**5.7**

3.9.2.6 SUMMARY OF FINANCIAL EFFECTS OF PHYSICAL RISK

The analyses show that the group has significant exposure to acute climate risk as well as chronic climate risk. This is also as expected when simulating climate risk in a landscape located near the coastline and having a rugged terrain. The public sector, through the municipalities in Northern Norway, has the overall responsibility for managing climate adaptation in the region. The management of this responsibility will be decisive in determining which of the bank's assets may risk a reduced market value in the future due to chronic and acute physical risk. The use of map data in credit approval will become, even more than now, a central part of customer advice to reduce future risk of stranded assets. Physical risk is primarily an insurance risk in the short and medium term, but it may materialize into a financial risk for the group in the event of climate changes affecting infrastructure and the property portfolio in the long term.

Increasing extreme weather may affect the result volatility of insurance companies, as well as the price to customers. The concentration risk is largely diversified through participation in the Norwegian Natural Disaster Pool, but it may be challenged in the long term if the state, municipalities, and financial institutions do not prioritize climate adaptation.

Screening of physical risk in the ESG module shows that customers with high physical risk in the medium and long term have an insignificant contribution to net interest income. These customers account for 14.2 MNOK of net interest income in the group, which constitutes 0.4 percent of the group's total net interest income. Despite the limited contribution to results, customers with elevated physical risk from 2025 will be closely monitored through metrics for the maximum share of volume with low ESG scores, as well as requirements for higher decision levels in credit approval.

3.9.3 Transition risk

3.9.3.1 LOAN PORTFOLIO'S EXPOSURE TO TRANSITION RISK

Transition risk is a distinct underlying risk category, with various industry-specific questions in the ESG module. Additionally, it is adjusted for the inherent risk of the industry to which the customer belongs. Industry-related questions and inherent risk associated with transition risk have the greatest impact on the total score, as this type of risk is expected to have the highest likelihood of materializing into financial losses. The industries of commercial real estate, housing cooperatives, and fisheries score the lowest on transition risk. This is due to both relatively high inherent risk and strict requirements and expectations from authorities and interest organizations for transformation. New technology and stimulation, in the form of support schemes from authorities, seem to take longer than anticipated in these industries. Additionally, there are significant investment barriers to being able to transform in these industries, which means that the work to transform must take place from a more long-term perspective. The average total score is lower for transition risk compared to the average total score for all industries.

Table 3-12: ESG score transition risk

INDUSTRY	NUMBER OF CUSTOMERS SCORED	VOLUME (MNOK)	PHYSICAL RISK (0–10), AFTER INHERENT ADJUSTMENT	AVERAGE TOTAL SCORE (0–10)
Commercial property	233	9 688	3.6	5.1
Fisheries	71	7 011	3.7	4.8
Industry and others	143	6 216	6.1	6.7
Aquaculture	16	3 967	7.0	7.3
Property projects	39	2 105	5.2	5.8
Power production (renewable)	9	2 038	7.5	7.8
Shipping	13	1 805	5.6	6.7
Transport	5	1 048	5.0	6.1
Machinery and construction contractors	28	732	4.0	5.3
Housing cooperatives	26	361	3.5	5.2
Agriculture	47	481	5.6	6.1
Total	**630**	**35 452**	**IA**	**5.7**

3.9.3.2 DISTRIBUTION OF PROPERTIES THE GROUP HAS MORTGAGED BY ENERGY EFFICIENCY CLASS

Home loans and loans to the industry for the sale and operation of real estate constitute the largest share of the group's loan portfolio. In assessments of transition risk, loans secured by real estate are therefore of particular relevance to the group. The most central risk drivers related to real estate in the short, medium, and long term are considered to be:

- The building's standard, age, TEK standard, energy labelling, and environmental certification.
- Preference changes among buyers and tenants.
- The loan term.

The group has identified challenges related to the lack of energy labelling of residential and commercial properties and weak compliance with energy certification requirements among developers. The lack of energy labelling affects the group's ability to:

- Provide green financing.
- Qualify residential and commercial property loans according to the Green Finance Framework (GFF).
- Classify homes as green according to the Taxonomy Regulation Article 8.
- Estimate correct risk in the security portfolio.
- Influence borrowers and property owners to choose green solutions.

The group has therefore established goals to increase the number of energy-labelled residential and commercial properties during 2024 and the coming years, as well as increase the number of energy labels in classes A-D. In 2025, a new metric will be introduced, focusing on the share of taxonomy-compliant residential and commercial properties of the total property volume. The group has also operationalized these goals through changed guidelines and requirements in governance documents for credit approval. In addition, the bank has taken an active position towards the industry, including both developers and appraisers, in relation to the fact that the lack of energy labelling is something that cannot be solved without contributions from the mentioned actors.

Table 3-13: Distribution of mortgages in residential property (including housing cooperatives and transferred to SB1 Boligkreditt) by energy efficiency class

ENERGY EFFICIENCY CLASS	NO. OF PROPERTIES	SHARE	VOLUME (MNOK)	SHARE
A	451	0.8%	1 508	1.5%
B	2 687	4.6%	8 974	8.8%
C	1 705	2.9%	4 517	4.4%
D	2 274	3.9%	5 599	5.5%
E	2 267	3.8%	5 739	5.6%
F	2 926	5.0%	7 107	7.0%
G	4 181	7.1%	9 123	9.0%
Expired energy certificate	1 701	2.9%	3 515	3.5%
Lacking energy certificate	40 764	69.1%	55 758	54.7%
Total	58 956	100%	101 841	100%

Table 3-14: Distribution of mortgages in commercial property by energy efficiency class (including transferred to SB1 Næringkreditt)

ENERGY EFFICIENCY CLASS	NO. OF PROPERTIES	SHARE	VOLUME (MNOK)	SHARE
A	9	0.3%	1 004	5.2%
B	81	3.0%	2 609	13.6%
C	44	1.6%	923	4.8%
D	59	2.2%	1 025	5.3%
E	36	1.3%	456	2.4%
F	39	1.4%	285	1.5%
G	40	1.5%	225	1.2%
Lacking energy certificate	2 383	88.6%	12 687	66.0%
Total	2 691	100%	19 214	100%

Tabele 3-15: Distribution of residential property balance by age (including housing cooperatives and transferred to SB1 Boligkreditt)

	AGE DISTRIBUTED IN MNOK					
	UNKNOWN	BEFORE 1990	1990–2010	2011–2020	AFTER 2020	VOLUME (MNOK)
Residential property	5 996	54 338	20 330	13 349	6 494	101 841
Share	5.9%	53.9%	20.3%	13.3%	6.5%	100%

Table 3-16: Distribution of commercial property balance by age (including transferred to SB1 Næringskreditt)

	AGE DISTRIBUTED IN MNOK					
	UNKNOWN	BEFORE 1990	1990–2010	2011–2020	AFTER 2020	VOLUME (MNOK)
Commercial property	3 840	4 879	4 639	3 890	1 966	19 214
Share	20.0%	25.4%	24.1%	20.2%	10.2%	100%

3.9.3.3 SUMMARY OF FINANCIAL EFFECTS OF TRANSITION RISK

The EU's revised building directive (EPBD) was adopted in March 2023 with the aim of improving the energy efficiency of buildings in the EU. There is significant uncertainty regarding the incorporation of the new building directive into Norwegian law. Studies conducted by Eiendomsverdi show a weak correlation between energy labels and the accuracy of market value. The effect of energy labels will likely be captured by other attributes such as construction year or location. It is likely that the energy rating will become increasingly important for pricing in the long term, due to improved data quality, revision of the energy directive, and increased focus among home buyers. There are currently no indications that the group needs to incorporate increased loss provisions due to a decline in the value of mortgaged properties as a result of weak energy ratings in the short and medium term, but it is expected that this could affect market value in the long term.

Screening of transition risk in the ESG module shows that customers with high transition risk in the medium and long term have a low contribution to net interest income. These customers account for 128.6 MNOK of net interest income in the group[1], which constitutes 2.8 percent of the group's net interest income, and this type of customer will be closely monitored from 2025 through metrics for the maximum share of customers with high ESG scores.

The current ESG stress test in the IFRS 9 model, where the transition risk score from the ESG module is incorporated at the customer level, indicates low risk of increased loan losses in the short, medium, or long term. This is partly due to:

- Only a small portion of the loan portfolio has a very low ESG score.
- The bank has no exposure to industries such as coal, oil, and gas extraction.
- The macro levels in the respective scenarios mentioned in chapter 3.2 are relatively mild compared to the current interest rate level.

The group's risk assessments indicate that the overall ESG risk in the mortgage portfolio is low in the short term but increases to low to moderate in a medium and long-term perspective.

In the commercial property portfolio, the overall ESG risk is assessed as low to moderate in the short term but increases to moderate in a medium and long-term perspective. This is due to expectations that companies will need to implement more measures to adapt to new requirements, new technology, or preference changes in the rental market.

[1] *Note 3 Annual Report*

3.9.4 Climate-related opportunities

3.9.4.1 ENERGY TRANSITION PROPERTY

The report by Håkon Solheim and Bjørn Helge Vatne at Norges Bank, "Energy Transition of Housing May Become a Net Cost for the Average Household,"[1] shows that energy transition of housing can become a significant cost for the personal market. This can be both a risk and an opportunity for the bank. If energy efficiency improvements are to be financed through loans, this could increase the demand for new loans. If Norwegian homeowners are required to make significant investments to improve the energy efficiency of their homes, this will need to be financed through government support schemes, savings, or increased debt burden. The goal of energy efficiency improvements for the housing portfolio applies to both existing and new homes.

SpareBank 1 Nord-Norge has significant parts of its collateral mass exposed to home loans (including those transferred to SB1 Boligkreditt). The analysis from the survey tries to estimate what such an energy efficiency scenario will cost for different types of housing. This is only an estimate and can vary significantly from the actual cost. Among other things, the survey lacks data on whether upgrades have been made to existing homes, and the investment needs could then be significantly reduced per housing type. The estimated cost for the different housing types is a combination of the variables estimated consumption, norm consumption (15 percent lowest energy consumption per square meter), savings potential, and age.

Figure 3-4 shows an overview of the estimated upgrade needs in the mortgage portfolio SNN has collateral in, given that the housing stock in SNN was similar to the average used in the survey. The average estimated upgrade needs vary greatly between the respective housing types, where, for example, single-family homes and apartments have an estimated upgrade need of 450 TNOK and 160 TNOK, respectively. SNN has 63.5% of the objects in single-family homes, which will represent an estimated upgrade need of 14 MRDNOK. The total borrowing need given the current housing portfolio will be 18 MRDNOK. The need could be significantly less if any support schemes from authorities and self-financing had been taken into account. Nevertheless, there are significant opportunities for the group to contribute to energy efficiency by offering upgrade loans to the personal market so that they can achieve the government's ambitions for energy transition.

The group has identified the opportunity to contribute to the green transition and simultaneously reduce climate risk in its own mortgage portfolio by offering "green products" to personal market customers. The products "green home loan" (homes with energy class A and B) and "Green environmental loan" are important tools for reducing climate risk in the mortgage portfolio, as well as providing customers with incentives to choose environmentally friendly solutions through better pricing. Furthermore, the group generally does not finance residential properties with missing energy certificates, and the group is cautious about financing residential properties with weak energy ratings.

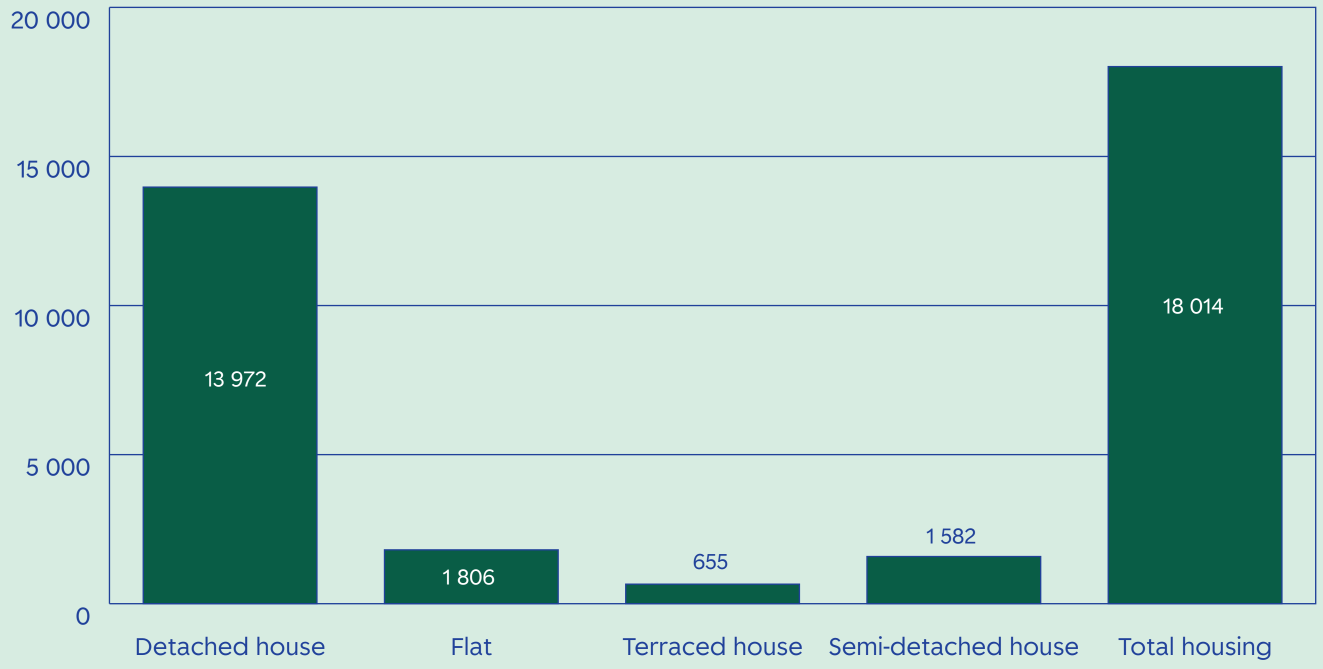
In commercial real estate, the group has established "green business loans," which involve better pricing for commercial real estate financing that meets certain criteria for energy rating, environmental certification, and construction year. The business loan "Building Renovation" was introduced as a new green product in 2023 and is adapted to the requirements of the EU taxonomy. The building must migrate at least two energy classes up after renovation or show a 30 percent improvement in energy efficiency to qualify. Furthermore, it is specified in the policy for CB that the group should be cautious about financing commercial properties with missing or weak energy ratings. Work is also underway to introduce transition loans and individual measures for commercial properties during the coming year.

[1] https://www.norges-bank.no/aktuelt/nyheter-og-hendelser/Signerte-publikasjoner/Staff-Memo/2024/staff-memo-7-2024-energi-omstilling/

Table 3-17: Average upgrade cost by housing type (in NOK)

	DETACHED HOUSE	FLAT	TERRACED HOUSE	SEMI-DETACHED HOUSE
Average estimated upgrade cost	450 000	160 000	300 000	360 000

Figure 3-4: Average upgrade cost by housing type (in NOK)



3.9.4.2 ENERGY TRANSITION CB PORTFOLIO

Regarding the remaining business portfolio, it is expected that larger investments will be necessary to reduce climate change and adapt to government expectations. This will be necessary to remain competitive if the authorities introduce emission charges within certain industries. Analyses from the ESG module show that several industries have greater investment barriers before they can adapt in line with the expectations of authorities and other interest organizations. The potential to increase exposure to existing customers or new customers due to the demand for low-carbon products is high. To address these opportunities, the group has integrated extended concentration frameworks within specific industries that have customers who stimulate green transition. Here, the competence of the group's customer advisors and outgoing customer initiatives will be key to increasing market shares.

4. Biodiversity and ecosystems

SpareBank 1 Nord-Norge is located in a market area with rich natural resources that contribute to value creation for the region. The Group recognizes that its strategy and business model can have both positive and negative impacts on biodiversity and ecosystems, particularly through lending. This chapter describes how the group has integrated the impact on nature degradation and ecosystem weakening into its processes, based on ESRS E4 – Biodiversity and Ecosystems.

In connection with the double materiality assessment in 2024, several types of impacts, risks, and opportunities related to biodiversity and ecosystems have been identified. The analysis used to identify these impacts, risks, and opportunities is developed based on the requirements of ESRS 1 and EFRAG's guide on double materiality, and addresses a company's impacts, risks, and opportunities (IRO). In the following chapter, the abbreviation IROs will be used to denote material impacts, risks, and opportunities.

4.1. Connection to strategy and business model

In connection with the double materiality assessment in 2024, the Group identified several types of IROs related to biodiversity and ecosystems. This includes both the impact a financial group has on nature and biodiversity, as well as how framework conditions such as the Nature Agreement and Norway's goal of protecting 30% of nature may affect banks and businesses in the future. Ultimately, the impact "Nature degradation and ecosystem weakening" was scored as particularly material for the Group (Table 4-1). It is mainly related to the Group's financing of projects.

Table 4-1:
The Group's material impacts, risks, and opportunities (IROs) related to biodiversity and ecosystems with associated targets and value chain placement.

IRO NAME	IRO CATEGORY	TARGET	PLACEMENT IN VALUE CHAIN		
			UPSTREAM	OWN OPERATIONS	DOWNSTREAM
Nature degradation and ecosystem weakening	Negative impact	To be developed in 2025			x

All local offices of the Group are located in Northern Norway, in cities or densely populated areas on already developed land. Despite this, the Group acknowledges that its own premises can also have a negative impact on, for example, animal and bird life. However, it has not been identified that the Group has locations in areas with vulnerable biological diversity or operations that significantly affect endangered species.

SpareBank 1 Nord-Norge's business strategy for 2024 has a strategic compass with four guiding principles: sustainability, insight, quality, and customer orientation. Under the principle of sustainability, nature risk is included, a risk type that is significant for the Group's business model, especially because the Group is located in an area that strongly bases its value creation on natural resources. Loss of biodiversity and degradation of ecosystems must therefore be included in processes where the Group has a particular impact. This is both to reduce the Group's own risk and to reduce the negative impact that has been identified.

To strengthen the Group's robustness, it is necessary to understand more about how nature destruction and damage to ecosystems can affect customers' ability to create value over time. Through screening of customers' ESG risk and in dialogue with the customer, some of this information is obtained, but the area is still new for the Group and must in the future be included to an even greater extent in the Group's plans for risk management, risk analyses, and competence development for the Group's employees.

The sustainability survey for 2024, conducted by Kunnskapsbanken kbnn.no, shows that much of the Northern Norwegian business sector relies on nature in its operations, but only one-fifth of businesses see the loss of nature as a risk to their operations. Through the lending process, the Group can reduce its negative impact by requiring customers to manage nature risk. The credit process can thus gather information about the customer's risk exposure and simultaneously contribute to raising awareness about nature degradation and its consequences.

The Group has begun mapping important ecosystems and biodiversity in Northern Norway to get an overview of how vulnerable the Northern Norwegian natural and marine biodiversity is today. Analyses conducted show that the coastline is most susceptible to nature degradation, and that littering, emissions from marine industries, and possible overfishing are among the biggest threats to marine biodiversity and various ecosystems. The measures in the Nature Agreement, with national goals of protecting 30% of natural areas, may change the framework conditions for those who depend on natural resources and land use in their value creation. A robustness analysis in accordance with the requirements of ESRS E4 has not been carried out. This is planned to be developed by 2026.

The negative impact "Nature degradation and ecosystem weakening" is related to land use changes that the Group assumes could ultimately lead to land degradation[1], soil sealing[2], and desertification.[3]

1 *Degradation of ecosystems on land.*

2 *Covering the soil in a way that makes it impermeable (for example, a road).*

3 *Degradation of land in dry, semi-dry, and less humid areas due to various factors, including climate variations and human activities. Desertification does not include the natural expansion of existing deserts. The definitions are taken from the Ministry of Finance's unofficial translation of ESRS.*

4.2. Policies

IIn 2024, work began to include the impact of "*Nature degradation and ecosystem weakening*" in the Group's governance documents. From 2025, the Group's risk strategy and credit policy, as well as the bank's Policy for Credit Authorities and Grants, will address this impact and the group's handling of it.

The credit policy describes, among other things, that for new customer engagements or increases in existing engagements, the engagement must be scored in an ESG module, applicable to all new customer engagements over 5 MNOK. This is a model used in credit approval and includes industry-specific questions related to several ESG aspects. Biodiversity and ecosystems are also part of the questions to the customer. Furthermore, the credit policy from 2025 has new requirements for construction loans for larger projects.

Where it has been decided that projects that may contribute to weakening biodiversity should be elevated to the Board for decision. It should also be assessed whether construction cases may lead to land conflicts that can impact social conditions. From 2025, it has also been decided to include a new point in the Policy for Credit Authorities and Grants, which means that credit cases that end with a weak score in the ESG module should be elevated to a higher authority level than ordinary credit cases.

The overall score in the ESG module will be influenced by customers' responses related to nature degradation and biodiversity. The changes described in this section aim to better manage the risk associated with nature degradation.

GOVERNANCE DOCUMENT	DESCRIPTION	RESPONSIBLE
Credit policy	Prioritization of market areas, industries, and exposure the group is willing to take. Describes specific measures from 2025 to handle nature degradation and land use in construction cases.	Credit and Risk Management

Several areas addressed in the Credit Policy for the Corporate Market:

- **Agriculture:** The farm is expected to be certified according to the quality assurance system in agriculture (KSL), and the KSL report should be obtained. KSL is the common quality system for agriculture and is recognized by the Norwegian Food Safety Authority as the national industry standard, ensuring that production is carried out in an environmentally friendly manner.
- **Deforestation:** The bank does not finance companies that use timber from actors involved in illegal logging, selling illegally logged timber, or deforestation, and/or that destroy tropical rainforests, remove primary forests, or protected forests.
- **Aquaculture and Fisheries:** In connection with screening in the ESG module, the customer's knowledge of nature risk and the industry's impact on ecosystems is mapped.

The Group does not have governance documents related to the protection of biodiversity and ecosystems associated with its own operational areas. This is because the Group has not identified that it has locations in areas with vulnerable biological diversity or operations that significantly affect endangered species. SpareBank 1 Nord-Norge does not have governance documents related to the traceability of products impacting biodiversity or the management of ecosystems to maintain biodiversity. Reference is made to the Group's work on social rights and stakeholders in ESRS S3.

4.3. Actions

For SpareBank 1 Nord-Norge, biodiversity and ecosystems is a new material topic for 2024. The number of actions related to the material IRO "Nature degradation and ecosystem weakening" is therefore limited. Table 4-2 provides a description of the most central actions.

Table 4-2:
Actions related to the impact of nature degradation and ecosystem weakening

DESCRIPTION OF THE ACTION	TIME HORIZON	SCOPE AND OUTCOME
Changes in the credit policy and authority structure for the Corporate Market have been introduced to address issues related to nature degradation and land conflicts.	2025	The measure will lead to more thorough assessments of natural degradation and requires both the customer and the advisor to raise awareness about this.
Competence development of the company's employees related to natural risk.	2024	Better assessments in credit granting. Integrates natural risk into several processes and contributes to reducing the company's negative impact. • 9 of the company's employees, represented from various professional environments, completed the single subject 'Nature and Sustainability' organized by NTNU with the aim of strengthening the company's competence in the area. • 358 of the company's employees were assigned a digital course on natural risk with the aim of understanding and recognizing various forms of natural risk. The course was developed by the SpareBank 1 alliance and had a completion rate of 95.25%.

Furthermore, in 2024, SpareBank 1 Nord-Norge has implemented the following measures with indirect effects on impact:

- Participation in the pilot project with SINTEF 'Digital Platform for the Fishing Fleet' for the fishing industry, which has been initiated to contribute to better sustainability reporting from the industry. The pilot project will address the mapping of emissions, littering, and overfishing from the maritime sector, which can pose a threat to ecosystems along the coastline. The project consists of partners from research, banking, and the fishing industry. The work is planned to be completed in 2026.

The Group currently has no procedures for compensation for loss of biodiversity and has also not developed measures based on nature-based solutions[1]. The Group will explore new measures in 2025 to address its negative impact on nature.

4.4. Targets

SpareBank 1 Nord-Norge's targets regarding the impact 'Natural degradation and weakening of ecosystems' are indirectly included in the Group's metrics for the use of the ESG module in screening new and existing customer engagements. From 2025, new requirements have been set in the credit policy. The Group currently has no measurement of the effect of the action. The Group will develop targets during 2025 to limit its negative impact on biodiversity and ecosystems.

[1] *Measures to protect, conserve, restore, use, and manage natural or modified ecosystems on land, in freshwater, on the coast, and in the sea in a sustainable manner, addressing social, economic, and environmental challenges effectively and adaptively, while maintaining human well-being, ecosystem services, resilience, and benefits for biodiversity (from the Ministry of Finance's unofficial translation of the ESRS standard).*

5. Own workforce

SpareBank 1 Nord-Norge's employees are a crucial factor that has been incorporated into one of the three business strategic goals for the group. Overall, employees' engagement, experience of inclusion, and diversity in the workplace provide good growth conditions. This creates value for SpareBank 1 Nord-Norge. The following chapter describes the Group's work with its own employees based on the reporting standard ESRS S1.

In connection with the double materiality assessment in 2024, several types of impacts, risks, and opportunities related to own employees have been identified. The analysis used to identify these impacts, risks, and opportunities is developed based on the requirements of ESRS 1 and EFRAG's guide on double materiality, and addresses a company's impacts, risks, and opportunities (IRO). In the following chapter, the abbreviation IROs will be used to denote material impacts, risks, and opportunities.

5.1. Link to strategy and business model

In SpareBank 1 Nord-Norge's business strategy, it is stated that the group shall have 'engaged employees in an inclusive organization'. Employees are crucial for the Group, as high engagement in work contributes to mastery and energy in everyday work life. Furthermore, it is essential that employees feel included, seen, and recognized for their efforts.

In connection with the revision of the materiality assessment in 2024, several impacts, risks, and opportunities (IROs) related to employees were identified. Finally, five of these were scored as particularly material (Table 5-1).

Table 5-1:
Particularly material IROs related to employees

IRO NAME	IRO CATEGORY	GOAL	PLACE IN VALUE CHAIN		
			UPSTREAM	OWN ACTIVITIES	DOWNSTREAM
Diversity and inclusion	Positive impact	We shall have engaged employees in an inclusive organization. *Se Table 5-2 for specific metrics.*		X	
Competence development	Positive impact			X	
HSE	Positive impact			X	
Collective agreements	Positive impact			X	
Sick leave	Risk			X	

The employees significantly affected by the Group's activities are the group's own employees and not self-employed individuals or persons engaged through third-party companies. The positive impacts stem from activities that include organizing various employee forums, competence development, HSE management, and trade union cooperation.

The Group has identified a material risk of production loss costs associated with sick leave due to the high incidence of sick leave in certain parts of the group. To better understand the factors related to employees that have contributed to an increased incidence of sick leave, a project was carried out in 2024 to map the causes of long-term absence (see 5.10.2).

5.2. Policies

Table 5-2 shows the governance documents for the material IROs related to SpareBank 1 Nord-Norge's own employees. A brief description of the document and the person responsible for implementation is also included.

Table 5-2:
Policies addressing the material IROs related to own workforce

IRO	GOVERNANCE DOCUMENT	DESCRIPTION	HIGHEST RESPONSIBLE	
			OPERATIONAL	APPROVES DOCUMENT
Diversity and inclusion	Risk strategy	Sets the group's risk willingness qualitatively and quantitatively. Has metrics related to gender balance in management and inclusion.	Group Director Risk	Board
Competence developmen	Policy for competence	The purpose of this policy is to establish fundamental principles for competence management to assist HR, managers, and employees in identifying competence needs and implementing the right measures.	Group Director Organisation and Business Support	Board
HSE	Standard for systematic HSE work in the group	Sets goals, roles, responsibilities, and guidelines for systematic HSE work in the group.	Group Director Organisation and Business Support	CEO
Sick leave	Risk strategy	Sets the group's risk willingness, qualitatively and quantitatively. Has metrics related to sick leave.	Group Director Risk	Board
Collective Agreements	Company Agreement	The Company Agreement is subject to the Main Agreement (HA) and the Central Agreement (SA) and cannot conflict with these. The Company Agreement takes precedence over local special agreements. The purpose of the Company Agreement is to establish salary and working conditions that are not regulated in the SA.	Group Director Organisation and Business Support	CEO and Chief Union Representatives

In SpareBank 1 Nord-Norge, human rights impacts, collaboration with our own employees, and workers' rights are regulated through central and local collective agreements.

The group does not have explicit guidelines that address human trafficking, forced labour, or child labour. This is because such practices are strictly regulated and prohibited under Norwegian law, which the group fully complies with. The group is committed to ensuring that all our employees work under conditions that comply with applicable laws and regulations.

The Working Environment Act imposes requirements for systematic HSE (Health, Safety, and Environment) work for employers. In SpareBank 1 Nord-Norge, this is outlined in a standard for systematic HSE work in the group. Here, HSE goals, roles, and responsibilities for HSE, action plans (IA and HSE plan), safety policy (safety procedures), and environmental profile are presented.

In the IA and HSE plan (2024–2025), there is also an initiative to further develop collaboration with educational agencies through the reception of employees in work training and language practice in SpareBank 1 Nord-Norge. This is an initiative to ensure increased focus on diversity and strengthen inclusion competence internally.

In the Recruitment Policy, principles and guidelines are outlined that apply to all recruitment processes in SpareBank 1 Nord-Norge.

Equality and diversity are highlighted as a separate point where active, targeted, and systematic work is to be done to promote equality, diversity, and prevent discrimination. Adaptation is highlighted as a separate point by making individual adaptations of the recruitment process for job seekers with disabilities or other needs that candidates may have.

The Recruitment Policy also states that the Group never collects information about pregnancy, adoption, religion, political issues, union membership, ethnicity, disability, sexual orientation, gender identity, or gender expression from job seekers.

5.3. Stakeholder engagement

The Group has established systems for collaboration and involvement of all relevant stakeholders. Relevant stakeholders include employees, managers, union representatives, safety services, the board, group management, the representatives, and internal audit. External stakeholders may include NAV, the Labor Inspection Authority, the Data Protection Authority, and the Financial Supervisory Authority.

The Group maintains ongoing dialogue with stakeholders to ensure a high degree of cooperation and involvement. The responsible director will be operationally responsible for ensuring compliance within their area.

Employee representation in governing bodies and committees

SpareBank 1 Nord-Norge's own employees are well represented in the group's management and governing bodies. A fixed meeting structure has been established in the Group's formal bodies, where various topics related to employees are addressed. Examples of such bodies include:

- The Supervisory Board, which meets approximately once a year (the Group's highest body where employees are represented). The Supervisory Board, among other things, elect members to the bank's board and oversee the board's management of the bank. For more information, see 1.2.1.2.3. Roles and Responsibilities of the Supervisory Board.
- The Board of Directors, which meets 10 times a year (employees elect 2 board representatives). The board oversees the group's business strategy and risk strategy, adopts policies, and receives reports from the administration throughout the year. For more information, see 1.2.1.2.2. The Board's Roles and Responsibilities.
  - Subsidiaries have a similar structure with employee representatives.
- The Joint Committee, which holds approximately 10 meetings a year (tripartite cooperation with management, union representatives, and safety services).
  - Subsidiaries have a similar structure with representatives from management, union representatives, and safety services.

The Joint Committee shall contribute to creating and further developing good cooperation between employees and management in the group. The committee functions both as a working environment and cooperation committee and shall handle matters at the group level in accordance with the Main Agreement, the Central Agreement, the Company Agreement, the Working Environment Act, the bank's guidelines, and other provisions.

In addition, several thematic committees and councils have been established to provide input on various matters related to employees in the group. Examples of such councils and committees include:

- Employee Associations at various locations (Social activities for employees)
- Corporate Sports Teams at various locations (Social and physical activities for employees)
- AKAN Committee (Issues related to substance abuse and gambling for employees)
- Young Council (Employees under 34 years old)
- Diversity Forum (Highlighting and ensuring diversity)
- HSE Forum (Interdisciplinary council on HSE issues)

Under measures related to IROs, the results and effects of the committees and councils mentioned above are presented.

Other Interaction with Employees

- Pulse surveys on the work environment and leadership (16 questions throughout the month + the full question battery (60 questions) in January each year)
- Development conversations between manager and employee (annual mandatory development conversation + 3 recommended follow-up conversations)

5.4. Targets

SpareBank 1 Nord-Norge has established three types of goals: financial goals, strategic goals, and tactical goals. Strategic and financial goals are set by the board. Tactical goals are set by the administration or group management. The most material IROs have metrics related to strategic and tactical goals. Table 5-3 presents the goals, status for 2024, background for the goals, and stakeholder involvement.

Table 5-3: Targets related to the Group's material IROs associated with own employees

TARGET	TARGET PERIOD The period the goal applies to	STATUS 2024*	SCOPE	REFERENCE VALUE	REF.-YEAR	METHODS / ASSUMPTIONS Scenario/political goals	STAKEHOLDER INVOLVEMENT AND FOLLOW-UP Whether/how stakeholders have been involved in goal setting
Gender balance 40% women in management positions	2024–	46% •	Own work-force	43%	2023	Incorporated into the *risk strategy*: Equality and gender balance in leadership are expected in a modern working environment. It affects internal factors (career development and equality) and external factors (reputation, employer branding).	The risk strategy is adopted by the group's board – with input from relevant expert groups. The status of gender balance is reported from HR to management and relevant groups quarterly.
Engaged employees (Employee survey)	2024–	7.6 (0–10 scale) •	Own work-force	7.4	2023	Incorporated into the *business strategy*: Engagement can have a positive impact on lower turnover/sick leave and increased efficiency.	The business strategy is adopted by the group's board – with input from relevant expert groups. The status of engagement is reported from HR to management and relevant groups quarterly.
Inclusion (Employee survey)	2024–	8.0 (0–10 scale) •	Own work-force	7.8	2023	Incorporated into the *business strategy*: Inclusion has a positive effect on internal factors and external factors (employer branding, recruitment, and reputation).	Forretningsstrategien vedtas i konsernets styre – with input from relevant expert groups. The status of inclusion is reported from HR to management and relevant groups quarterly.
Employee experience (Employee survey)	2024–	31 (–100 to +100 scale) •	Own work-force	22	2023	Incorporated into the *tactical goals 2024*: Employee experience affects how employees perceive the employer and their willingness to recommend the group as an employer to external parties.	Tactical goal adopted by the management – with input from the administration. The status of employee experience is reported from HR to management and relevant groups quarterly.
Sick leave	2024–	5.25% •	Own work-force	5.28	2023	Incorporated into the *risk strategy*: Sick leave affects productivity, competitiveness, and the quality of services. High sick leave also impacts turnover and employees' perception of their workday.	The risk strategy is adopted by the group's board – with input from relevant expert groups. Sick leave status is reported from HR to management and relevant groups quarterly.
Turnover	2024–	6.92% •	Own work-force	9.9	2023	Incorporated into the *risk strategy*: Turnover affects productivity, competitiveness, and the quality of services. High turnover also impacts sick leave and employees' perception of their workday.	The risk strategy is adopted by the group's board – with input from relevant expert groups. Turnover status is reported from HR to management and relevant groups quarterly.

** Status: • Target Achievement • Partial Target Achievement • Non-Achievement *No figures available from SSB*
Where metrics are achieved at the overall group level, it is considered green goal achievement. Where parts of the metrics are achieved or parts of the Group have achieved metrics, it is considered yellow – partial goal achievement. Where metrics are not achieved, it is considered red – non-achievement.

The group has not developed specific metrics related to the positive impacts of collective agreements and competence development. Metrics within engaged employees, inclusion, employee experience, and sick leave are not disclosed due to business-sensitive considerations. SNN still assesses the effect of the governance documents and measures related to these impacts. A more detailed description of this can be found in chapters 5.6-5.10.

5.5. Number of employees

Table 5-4: Distribution of the Group's employees

GENDER	NUMBER OF EMPLOYEES (NUMBER OF PERSONS)
Male	512
Female	570
Other	
Not reported	
Total number of employees	1 082*

The distribution of the Group's employees based on gender can be seen in Table 5-4. A more detailed description of employees by employment type and gender is shown in Table 5-5.

*The most representative figure in the accounts can be found in Note 22 Personnel Costs, Benefits, Loans, and Equity Certificates Owned by Senior Employees and the Board. Note 22 only presents permanent employees (1,045). However, Table 5-3 also includes temporary employees (37 temporary employees as of December).

Table 5-5: Employees by employment type

Per December 2024					
NUMBERS	FEMALE	MALE	OTHER	INFORMATION MISSING	TOTAL NUMBER
Employees (number of persons)	570	512			1 082
Permanent employees (number of persons)	553	492			1 045
Temporary employees (number of persons)	17	20			37
Employees without guaranteed working hours (number of persons)	*	*			0
Full-time employees (number of persons)	475	448			923
Part-time employees (number of persons)	95	64			159

** All hourly employees are defined in the part-time employee group, as they have an estimated workload of approximately 20% of a full-time position.*

5.6. Turnover

SpareBank 1 Nord-Norge considers two types of turnover: total turnover and voluntary turnover. Total turnover is based on all employees regardless of the reason for leaving. A breakdown of recorded reasons for leaving can be found in Table 5-6. Voluntary turnover refers to those who have left the group due to resignation.

In 2024, there was an average of 1,026 employees throughout the year. A total of 71 employees left the group, resulting in a total turnover of 6.92 %. Of the total, 63 employees left through resignation, resulting in a voluntary turnover of 6.14 %.

Table 5-6: Overview of reasons for leaving in SpareBank 1 Nord-Norge (permanent employees by company)

REASONS FOR TERMINATION	BANK	SNN FINANS	EM 1	REGNSKAPSHUSET
Voluntary resignation	28	5	9	21
Retiree	5			2
Agreements				1
Death				
Total	**33**	**5**	**9**	**24**

Calculation of Turnover

- Total Turnover: All permanent employees (with all reasons for leaving) / average number of employees during the year * 100
- Voluntary Turnover: Permanent employees who have resigned / average number of employees during the year * 100

5.7. Collective agreements

In SpareBank 1 Nord-Norge, as a general rule, all employees are covered by a collective agreement. Collective agreements regulate working and salary conditions in the group. The agreements include the following content:

- Parties and scope (who has entered into the agreement and who it applies to)
- Working hours, breaks, and holidays (including core time, flexitime, and compensatory time off)
- Compensation for work that deviates from normal working hours (shift work, overtime, travel, and participation in events for customers or the public)
- Salary (principles for salary formation, salary rates, salary process, and salary assessment)
- Pension and insurance schemes
- Competence development (with guidelines for education alongside work)
- Measurement and use of information about employees' performance
- Mandate for union representatives, employment committees, and working environment committees
- Duration and amendment of the agreement

Certain job types are exempt from the provisions of collective agreements, and some subsidiaries have their own collective agreements.

- The Company Agreement is a local collective agreement between the union representatives in Finansforbundet, LO Finans, and Bankvirksomheten and SpareBank 1 Finans Nord-Norge. The agreement is part of the collective bargaining cooperation in the financial industry and regulates local conditions.
- EiendomsMegler 1 Nord-Norge and SpareBank 1 Regnskapshuset Nord-Norge have their own collective agreements that regulate their local conditions.
- As a general rule, collective agreements are revised every 2 years or as needed.

The following positions are exempt from the collective agreement:

- In the Company Agreement, the following exceptions apply: Group management, managers with personnel responsibility who report directly to a group director, and employees in temporary positions, seasonal work, or other temporary work of 3 months or less.
- In the subsidiaries' own collective agreements, the following exceptions apply: The top manager, managers, and specialists who report directly to the top manager, as well as temporary employees with a duration of 3 months or less.

As at December 2024, 1,020 employees (94%) of the group's employees are covered by a collective agreement.

The table below (Table 5-7) shows the number of employees per company, as well as a calculation of those covered by a collective agreement based on the exceptions in the respective collective agreements mentioned above.

Table 5-7: Number of employees covered by collective agreement in the group

COMPANY WITH NUMBER OF EMPLOYEES	BANK	SNN FINANS
(including temporary employees)	Covered by a collective agreement	Not covered by a collective agreement
Banking operations (588) and SNN Finans (47)	586 employees (92%)	49 employees (8%)
EiendomsMegler 1 Nord-Norge (132)	123 employees (93%)	9 employees (7%)
Regnskapshuset Nord-Norge (315)	311 employees (99%)	4 employees (1%)

As of December 2024, 651 employees are organized in a trade union (employee organization). This constitutes 60% of the Group.

5.7.1. Actions related to collective agreements

Revision of Collective Agreements

The Company Agreement and the subsidiaries' collective agreements are generally revised every 2 years. If no specific requests for changes to the agreements are received, the agreement is extended in its entirety.

- In 2024, a desire to evaluate the current agreements was announced. According to the plan, some changes to the current Company Agreement and the collective agreements for the subsidiaries will be made during the spring of 2025. This measure will ensure that all companies have updated agreements for regulating work-related issues in the group. The effects of the measures are assessed by the Joint Committee, where all parties are represented.

5.8. Diversity and inclusion

In SpareBank 1 Nord-Norge, diversity and inclusion have taken a central position. These themes are expressed through principles and measures in several of the group's governance documents. Examples include recruitment guidelines, principles for competence, career development, and systematic HSE work.

The Diversity Forum has adopted the group's annual calendar for diversity activities. More detailed descriptions can be found in 5.8.1.

Gender balance in management positions has been a long-term focus area for SpareBank 1 Nord-Norge.

A specific goal has been to increase the proportion of women in management to 40%. This goal was achieved in 2021 after being elevated to a strategic level in 2019. For comparison, the proportion of women in management was 38% in 2019. For 2024, the goal achievement has been maintained and will continue to ensure a consistent gender balance in management.

Table 5-8 presents the gender balance for management in 2023 and 2024, as well as the age distribution among employees in 2024 in Table 5-9.

Table 5-8: Gender balance in management

MANAGEMENT IN SPAREBANK 1 NORD-NORGE	2023		2024	
	NUMBER	W – M*	NUMBER	W – M*
Executive management team	8	3 – 5	8	4– 4
Other management, bank	64	22 – 42	70	24 – 46
Eiendomsmegler 1	25	8 – 17	22	7 – 15
SNN Finans	6	4 – 2	6	4 – 2
Regnskapshuset	35	22 – 13	52	34 – 18
Total	**138**	**59 – 79**	**158**	**73 – 85**
Percentage distribution	100%	43% – 57%	100%	46% – 54%

** Distribution women and men*

Table 5-9: Age distribution of employees

AGE	NUMBER	PERCENTAGE
< 30 years	213	20%
30–50 years	509	47%
> 50 years	360	33%
Total	1 082	100%

5.8.1. Actions related to diversity and inclusion

In 2024, the Group has implemented several different measures within diversity and inclusion. These measures are also related to several of the IROs. Below is a summary of the most central measures within diversity and inclusion:

- Establishment of a diversity forum. The effect of this measure is increased awareness and understanding of diversity and inclusion, leading to increased insight, a better working environment, and increased employee satisfaction. The diversity forum has an ongoing time horizon with regular meetings and annual reports to the group management. The forum has adopted the group's annual calendar for diversity activities:
  - World Day for Cultural Diversity for Dialogue and Development
  - International Day for the Elimination of Racial Discrimination
  - Sámi National Day, International Women's Day, Kven People's Day, and World Mental Health Day
  - Arctic Pride celebration
- Establishment of a youth council (UNG-råd) with employees under 34 years old. The council aims to give the CEO a better understanding of the young employees' work experience and provide feedback on how they perceive the group's operations. The council members meet quarterly and are replaced every year.
- Annual celebration of Women in Finance. The group conducts an annual celebration with a breakfast seminar, featuring short lectures on diversity and equality. The effect of this measure is increased visibility and awareness of gender balance in the financial sector, as well as inspiration and motivation for women to take on leadership roles.
- Employee associations at various locations. The group provides welfare funds to the employee associations, which are used for various welfare activities where all employees at the location are invited.

The diversity forum prepares reports that evaluate the work on diversity and inclusion in SpareBank 1 Nord-Norge. These are submitted to the group management.

5.9. Competence development

SpareBank 1 Nord-Norge has established fundamental principles for competence management through its Competence Policy. These principles are intended to assist HR, managers, and employees in identifying competence needs and implementing the right measures. Competence measures in the group should always support and underpin the group's risk and business strategy and regulatory requirements.

The group should always have the right number of competent and customer-oriented employees in the right place at the right time. This requires employees who not only have understanding and insight but also skills and execution power.

Development conversations

The annual development conversation should be conducted by the end of March for the bank and SNN Finans, and during the autumn for EM 1 and Regnskapshuset. It is recommended to follow up the conversation with three shorter meetings per quarter throughout the year. All conversations that are conducted should be documented in the training system.

The development conversation should cover the following topics in an equal dialogue between the manager and the employee:

- Well-being
- Tasks and deliveries
- Personal and professional development
- Salary expectations

Development conversations

In 2024, a total of 790 mandatory development conversations were conducted. The gender distribution is as follows (Table 5-10):

Table 5-10: Conducted development conversations by gender

Gender	NUMBER OF ASSIGNED DEVELOPMENT CONVERSATIONS	COMPLETION RATE	
		NUMBER	PERCENTAGE
Male	468	384	82%
Female	536	406	76%
Total	**1004**	**790**	**79%**

1. *A potential source of error in the reporting is that the manager must check off in the training system that the conversation is "completed." Upon closer examination, it turns out that several managers have forgotten to perform this activity after the conversation has taken place. This is a weakness that will be addressed in the next reporting.*
2. *Employees who do not have an active employment relationship during the period the development conversation is activated will not receive the development conversation in the training system. For example, new employees in the bank with a start date after the first quarter (when the allocation is in the first quarter). This group conducts probationary conversations with the immediate manager (after 1, 3, and 5 months).*

Conducted digital courses and training by gender

In 2024, the group made a number of digital courses available to its employees. This includes 48 internal courses and 345 joint alliance courses with varying target groups for each course.

Employees are assigned different levels of courses and competence development based on their position. Some of the courses are also voluntary to complete. This can lead to variations in the number of course hours and training depending on the position and role. The gender distribution at an overall level is presented below:

- Men completed a total of 4,828.4 hours (289,704 minutes). Distributed among the number of men (512), the average hours of completed courses/training per male employee is 9.4 hours.
- Women completed a total of 5,065.9 hours (303,959 minutes). Distributed among the number of women (570), the average hours of completed courses/training per female employee is 8.8 hours.

The training statistics above only include registered courses in the training system. Employees also complete other courses and training that are not registered. For example, courses and conferences that are conducted with physical participation.

5.9.1. Actions related to competence development

In 2024, the Group has had a strong focus on competence enhancement in sustainability and artificial intelligence. This has been part of a broader strategy to ensure that employees are well-equipped to meet future challenges and opportunities.

Internally at SNN, training has been conducted in the use of Microsoft Copilot. Training on artificial intelligence has included fundamental principles, ethics, and practical use of AI. All employees are the target group for these courses.

Below is a selection of competence measures carried out in 2024 and planned to be continued in the coming years:

- **Industry program for the financial sector** offers continuing education in sustainability and artificial intelligence for employees in the financial sector. The studies are conducted at BI or NTNU and vary in the number of credits. The courses in sustainability are aimed at all employees or employees working with the corporate market. The courses in AI are aimed at all employees.
- **Digital transformation in the financial sector** covers topics such as the digitalization of financial services, the use of artificial intelligence and machine learning in finance, blockchain technology, and cybersecurity in the financial sector. The study is conducted at BI and provides 15 credits. All employees in finance are the target group.

- **Anti-money laundering and fraud:** Refresher courses and cases in AML and fraud are conducted regularly throughout the year to ensure that employees are well acquainted with the latest methods and requirements to combat money laundering and fraud. In 2024, eight different cases were sent out to employees, some targeting all employees, some for managers, and some for advisors in customer positions. Each e-learning course takes approximately 30 minutes to complete.
- **Privacy:** An e-learning course on privacy updates was conducted for all employees.
- **Annual signing of the SNN Code:** This is a process where all employees review and sign the company's ethical guidelines annually.
- **Scholarship allocation:** 14 employees were granted study scholarships in 2024 through the company's scholarship scheme for further and continuing education.
- **SNN Days for new employees and SNN Day for new leaders** are held twice a year.
- **Leadership development:** All new leaders participate in the development programme "New as a Leader in SpareBank 1", and a selection of leaders participated in the "Alliance Development Programme for Leaders".
- **New Employees:** All new employees undergo the following e-learning programmes:
  - Anti-money laundering tailored to their role
  - The SNN Code
  - GDPR and privacy regulations
  - Sustainable financial operations
  - IT security and information classification
  - Confidentiality obligations
  - Introduction to finance
  - The SpareBank 1 Alliance
  - Customer solutions
  - Health, Safety, and Environment (HSE)
- **New Leaders:** All new leaders undergo the following e-learning programmes:
  - Course in corporate governance
  - Anti-money laundering for leaders
  - Competition law in SpareBank 1
  - Privacy for leaders
  - The SpareBank 1 brand platform
  - HSE for leaders

5.10. HSE and sick leave

SpareBank 1 Nord-Norge shall ensure that all work is carried out in a responsible manner with regard to health, safety, and the working environment for employees, customers, and the external environment. The HSE policy in SpareBank 1 Nord-Norge is based on the following fundamental principles:

- Good HSE ensures satisfied employees and customers:
- HSE should be promoted through participation, information, and communication.
- Management must lead by example.
- HSE work must be systematic and based on risk assessments.
- Good routines, instructions, and procedures are necessary.

The Group will continuously improve systems and processes to prevent injuries and pollution and reduce risk as far as practically possible. When it comes to the working environment, health, and safety, the main focus is on promoting employee well-being, avoiding incidents and strains that can cause health damage, and stimulating health-promoting activities.

The provisions of the Working Environment Act, the Pollution Control Act, and other relevant HSE regulations are considered a minimum standard for HSE work. The goal is to establish safe and healthy workplaces and protect the external environment. Key figures on HSE can be found in Table 5-11.

The Group management and owners are committed to promoting this policy and supporting all HSE goals, measures, and procedures. All employees and partners are expected to do the same.

Table 5-11: Key figures HSE

Key figures for HSE 2024	REPORTED
Proportion of employees covered by the HSE system	All employees in the group (1082 incl. temporary employees)
Number of fatalities due to work-related injuries / poor health	No registered fatalities (0)
Number and frequency of work-related accidents	No registered work-related accidents (0)
Days lost due to work-related injuries / fatalities	No registered work-related injuries / fatalities (0)

Sick leave

The total sick leave in the group amounted to 5.25%. This is at a similar level to 2023, when it was 5.28%. Table 5-12 shows the company-wise distribution of sick leave for the past two years:

Table 5-12: Distribution of sick leave

	SICK LEAVE (DOCTOR-CERTIFIED AND SELF-CERTIFIED)	
COMPANY	2023	2024
SpareBank 1 Nord-Norge	4.71%	4.34%
EiendomsMegler 1 Nord-Norge	5.83%	6.06%
SNN Finans	5.94%	4.19%
Regnskapshuset	6.12%	6.60%
Group	5.28%	5.25%

5.10.1. Actions related to HSE

In 2024, the Group established a new HSE and IA action plan for the next two years as the basis for the Group's systematic HSE work. The action plan is anchored with the parties in the Joint Committee. The action plan aims to support and contribute to the Group achieving its relevant goals (see point 1.4).

Key actions in the Group's HSE and IA action plan for 2024/2025 are:

- Conducting continuous pulse surveys and annual physical safety inspections to ensure a proper working environment.
- Revising all relevant management documents within HSE.
- Establishing an interdisciplinary HSE forum consisting of professionals responsible for the area to ensure continuous knowledge sharing and effective coordination of relevant activities.
- Facilitating physical health through the Group's low-threshold activity concept SPOR and the Corporate Sports Team.
- The AKAN Committee (Workplace Competence Centre for Issues Related to Substance Abuse and Addiction) shall be a driving force in preventive and attitude-shaping work. This includes, among other things, providing training and information on substance abuse and gambling.
- Further develop cooperation with educational agencies through the reception of employees for work training and language practice.
- Offer various forms of competence-enhancing courses for different target groups within HSE.

HR resources are responsible for the implementation and follow-up of specific measures. In addition, the Group has dedicated Chief Safety Representatives in the parent bank and subsidiaries who are involved in the planning and ensure that the employer follows up on systematic HSE work. The implementation of points in the action plan is continuously reported to the Joint Committee along with the status of relevant measurement parameters.

5.10.2. Actions related to sick leave

The Group has set a goal of not having higher absence rates than the finance industry according to SSB industry statistics for the respective quarter/year. The Group works purposefully with the prevention and follow-up of sick leave to avoid unnecessary absence. The measures for this are defined in the HSE and IA action plan with the following:

- Proactively support managers of departments with high sick leave with an action plan.
- Regularly monitor overtime use and implement measures at the individual/department level to balance workload.
- Competence-enhancing measures for managers and employees.

In addition, through analysis and mapping, the Group has identified the units with the greatest potential for reducing sick leave and has established targeted measures to be implemented in 2025 for these units.

5.11. Reporting and undesirable incidents

In SpareBank 1 Nord-Norge, employees can report concerns or critical issues through internal deviation systems, internal reporting channels, or external reporting channels.

It must be ensured that the whistleblower has a proper working environment after submitting the report, as stated in the Group's Policy for Deviations and Reporting. There is also an established routine "How to Report" that describes how the whistleblower should proceed, which channels can be used, and how the report will be handled by the employer.

Regardless of how the report is made, a proper investigation and implementation of any measures to restore a proper working environment will be carried out, as well as protecting the whistleblower from retaliation. The Group's general handling of the report will be in accordance with the Routine for Case Processing for Handling Reports.

The Policy for Deviations and Reporting is revised every three years. The status of the number of reporting cases is reported to the board and the joint committee annually. This ensures that reporting channels are effective. No assessments are made on whether employees trust the reporting channels or the associated processes.

Internal reporting

As a general rule, reporting should be done internally to the whistleblower's immediate manager. In some cases, it is nevertheless appropriate to send the report to other internal resources within the organisation, such as the security manager, HR, union representative, safety representative, or lawyer. Reports can be made both orally and in writing. The whistleblower always has the option to remain anonymous, but they are made aware that it will not be possible for the employer to provide feedback on the progress of the case or follow up with the whistleblower. In 2024, 2 internal reporting cases were registered. These were handled according to routine.

External reporting

For cases where employees do not wish to report internally, an external reporting channel has been established. The channel is administered by Ernst & Young. They are an independent third party that receives the report on behalf of the employer and provides advice on further follow-up. It is possible for employees to send the report anonymously.

No reports were registered through the external reporting channel (EY) in 2024.

Harassment and discrimination

Pulse surveys of the working environment give employees the opportunity to express concerns about harassment and discrimination in the department. In 2024, approximately 1% of respondents (27 employees) reported that harassment and discrimination had occurred in their department.

Deviation and incident management

Incident management is an important part of the work in the Group. The purpose is primarily to learn from mistakes and incidents that occur. Working systematically with incidents also makes it better equipped to close gaps, minimise risk, and ensure better compliance with laws, regulations, and routines.

The following incidents must be recorded in SpareBank 1 Nord-Norge:

- Financial loss (including costs of error correction, reversal of incorrect income, etc.)
- Loss of reputation
- Breach of legal requirements, regulations, or the Group's values and guidelines
- Injuries/negative consequences for employees
- Other unfortunate/unwanted incidents

A total of 7 incidents were recorded in the deviation system for the HR area in 2024. Below is an overview of the themes for the incidents recorded in 2024:

- Data quality and data processing
- Errors and mistakes
- Breach of policy and guidelines
- Privacy breaches

No reports, concerns in employee surveys, or deviations were related to serious human rights violations against employees. None of the recorded incidents resulted in fines, penalties, or compensation.

6. Affected communities

SpareBank 1 Nord-Norge's activities are primarily located in the market area of Northern Norway. The group recognizes that the activities it undertakes can have both positive and negative effects on the local community. This chapter will describe how the group works to minimize the negative impact and strengthen the positive influence on the local community, based on the reporting standard ESRS S3 – Affected Local Communities. This is a reporting standard that particularly addresses how a company handles social and human rights impacts on local communities, including a description of the impact on vulnerable groups and indigenous rights.

In connection with the double materiality assessment in 2024, several types of impacts, risks, and opportunities related to affected communities have been identified. The analysis used to identify these impacts, risks, and opportunities is developed based on the requirements of ESRS 1 and EFRAG's guide on double materiality, and addresses a company's impacts, risks, and opportunities (IRO). In the following chapter, the abbreviation IROs will be used to denote material impacts, risks, and opportunities.

6.1. Link to strategy and business model

SpareBank 1 Nord-Norge has for several years reported on its impact on local communities through the annual report. In connection with the revision of the materiality assessment for 2024, this impact has been further clarified. Several types of IROs were identified in the process. In the end, two IROs were scored as material for the Group (Table 6-1).

Table 6-1:
The Group's material IROs related to affected local communities with associated targets and value chain placement

IRO NAME	IRO CATEGORY	TARGET	PLACEMENT IN VALUE CHAIN		
			UPSTREAM	OWN OPERATIONS	DOWNSTREAM
Land use conflicts in the north	Risk	To be developed in 2025			X
Local value creation	Positive impact	We will contribute to an attractive region. We will have engaged employees in an inclusive organization.			X

The Group operates in an area with a Sami population that has special rights to business and cultural activities. Sami rights encompass human, minority, and international rights. This is reflected in the Constitution's § 108, other laws, and international conventions. The group recognizes a responsibility to safeguard these rights properly in processes that the group influences. Besides being legally mandated, this is part of the Group's social responsibility and vision; For Northern Norway.

The risk 'Land conflicts in the north' is identified because the Group finances activities that can potentially conflict with business interests, community interests, and indigenous rights to land use. The use of land for business activities and potential conflicts around this have received increased attention in recent years through several news articles and reports. It has been particularly highlighted that the green shift may put extra pressure on natural resources and land use. An example of such cases is the Fosen case.[1]

Additionally, the taxonomy's provisions have clear requirements that sustainable economic activities must not violate 'social minimum requirements,' such as human rights violations. For this reason, the Group needs procedures to identify potential conflicts in connection with financing. The risk is therefore identified as material and will receive increased focus in 2025 through training, policies, targets, and actions.

The positive impact 'Local value creation' is mainly linked to the distribution of community benefits through the Community Lift's allocation strategy. But other aspects associated with the Group's activities also contribute positively. Among other things, through the Group's role as a major employer, contributing to the employment of more than 1000 full-time equivalents spread across 15 locations in the region. In addition, the Group has a positive impact through contributions with financing to individuals and businesses throughout the region.

[1] Fosen-saken – konflikt om vindkraftverk – Store norske leksikon

6.2. Policies

The risk 'Land conflicts in the north' is mainly related to the financing process. Therefore, the handling of this risk will be done through governance documents for credit approval. These state, among other things, that: 'SpareBank 1 Nord-Norge shall not provide financing to companies that contribute to systematic violations of human and labour rights.' The responsibility for this policy is assigned to the Group Director for Corporate Market. In addition, the topic is addressed in the work with the green finance framework, which includes the taxonomy's provisions on social minimum requirements. The group also reports on due diligence assessments in accordance with the Transparency Act, including a special obligation to safeguard human rights. Any violations of human rights will be handled based on the specific violation. There are no developed routines for handling compensation in case of violations. The Group's credit policy for the corporate market in 2025 has requirements for how land conflicts should be handled in construction projects. During 2025, this topic will be prioritized in the update of governance documents, credit processes, and other routines around financing.

The Group's business strategy sets the framework for the Group to create value for itself, its owners, and society as a whole. This means that the Group, across all activities, will make an effort to make Northern Norway an even better region for both people and businesses. This is reflected in one of the group's strategic goals: 'We will contribute to making Northern Norway an even more attractive region.' This includes the Group's prioritization of presence with local offices throughout the region, financing of people and businesses, knowledge sharing, and distribution of community benefits to contribute to value creation, residential attractiveness, and willingness to stay. This also includes the group's goal and ambition to be a driving force for a sustainable future in the north. Therefore, there will be several governance documents addressing this positive impact. Table 6-2 provides an overview of relevant governance documents.

Table 6-2:
Governance documents that handle the significant impacts, risks, and opportunities related to affected local communities

GOVERNANCE DOCUMENT	DESCRIPTION	RESPONSIBLE	
		OPERATIONAL	APPROVES DOCUMENT
Business strategy	SNN's strategy built around value creation for the group's customers, society, and SpareBank 1 Nord-Norge. Establishes the group's vision, values, overarching goals, and principles.	CEO and Executive vice presidents	Board of directors
Credit policy	Prioritization of market areas, industries, and exposure. (Including commitments to prevent human rights violations.)	Executive vice president Corporate Banking	Board of directors
Strategy for Samfunnsløftet	Priority areas for allocation of social benefits to public utility purposes.	Executive vice president Organisation and Business Support	Board of directors
Standard for Compliance with the Transparency Act	Describes SNN's commitment to respect fundamental human rights as a result of internationally recognized frameworks such as the ILO's core conventions, OECD guidelines, and the UN's Sustainable Development Goals.	Chief Financial Officer	Chief Financial Officer
Green Finance Framework	Describes the group's requirements for loans to be used for green financing. The framework has received a so-called Second Party opinion from ISS ESG.	Chief Financial Officer	Chief Financial Officer

6.3. Stakeholder engagement

SpareBank 1 Nord-Norge's interaction with the local community occurs through several different processes. These are described in Chapter 1.3.2. The stakeholder dialogue particularly addresses involvement around the impact 'Local value creation.' At the same time, the group, based on the risk 'Land conflicts in the north,' has a special obligation to conduct good stakeholder involvement of the local community on such issues.

The most central process for dialogue on these topics is in connection with lending. In connection with lending, information that may be significant for the customer's risk profile and thus the possibility of f inancing must be uncovered. For the corporate market, an ESG module is used to screen the customer's impact on climate, environment, and society. Here, customers respond, among other things, to compliance with the Transparency Act, which directly affects the company's work to prevent human rights violations. This ensures one part of stakeholder involvement that can provide useful insight into customers' relationship to land conflict.

In 2024, Samfunnsløftet processed 2,478 applications and had 1,969 active allocations as of 31.12.2024, where all stakeholders in various ways have a dialogue with Samfunnsløftet. In 2024, Samfunnsløftet conducted an external evaluation that determined that the allocations have beneficial effects on the goals of value creation, development, and making Northern Norway an even better place to live. To further develop the initiative, one of the recommendations from the evaluation is that it may be relevant for Samfunnsløftet to develop an even broader knowledge base and systematize stakeholder dialogue better. The recommendations have already been incorporated into the work on a new strategy, which aims to be completed in 2025.

In addition, through Kunnskapsbanken (kbnn.no), the group has extensive knowledge production on macro conditions that concern and affect the region. In 2024, there was a focus on the Truth and Reconciliation Commission's report through podcasts and programming of Agenda Nord-Norge, which the group organized in November 2024. Table 6-3 summarizes the stakeholder dialogue related to local communities.

Table 6-3:
Stakeholder dialogue related to local communities

WHAT	DIALOGUE FORM	FREQUENCY	RESPONSIBLE FOR ENSURING THAT THE DIALOGUE TAKES PLACE	POSSIBLE OUTCOME
Evaluation of the Samfunnsløftet strategy 2024	The evaluation is carried out by an external party and includes: * Survey to all applicants * Interview of selected cases	Single event	Executive vice president Organisation and Business Support	Affects new strategy in the area.
Customer dialogue during lending	Dialogue with the customer about ESG issues in the credit process. It can also include topics around local value creation.	Ongoing throughout the year	Executive vice president Corporate Banking	A negative ESG score can result in the customer not receiving a loan.
Insight about the region	News articles, seminars, dialogue meetings that address land and resource use in the north.	Ongoing	Executive vice president Organisation and Business Support	New knowledge production on kbnn.no. Enrich the group's materiality assessment.
Local value creation	Applications and dialogue with applicants of Samfunnsløftet.	Ongoing throughout the year	Executive vice president Organisation and Business Support	Prioritization of areas and measures supported by Samfunnsløftet.

There has not been a systematic dialogue with indigenous peoples regarding the financing of land-intensive activities in their areas of use. This will be considered going forward, based on the fact that many Sami communities are particularly vulnerable and under pressure related to land use. The group has also not implemented procedures to evaluate stakeholder engagement as described in Table 6-2.

SpareBank 1 Nord-Norge has established standards for reporting critical conditions and undesirable incidents for both employees and external actors. In addition, there is a specific procedure for handling employer's management of reports, to create process predictability for all involved parties. Local communities can report critical conditions through the group's whistle-blowing channel and can submit access requests in accordance with the Transparency Act via the group's website. The handling of incoming reports shall be in accordance with the group's Policy for Whistle-blowing and Deviations, or internal routine for customer complaints. In necessary cases, measures shall be taken to protect the whistleblower from retaliation.

The group has not introduced or developed routines and practices around compensation for any negative impact on local communities. This will be considered further in 2025.

6.4. Actions

For the risk 'Land conflicts in the north,' the main activity in 2024 has been to uncover the risk through the work with double materiality assessment. Since this is a new risk type for the Group, no concrete actions have been taken to reduce the risk in 2024, except that the risk is included in the Group's credit policy for 2025. Further actions will be developed and reported from 2025.

The Group's business strategy and vision 'For Northern Norway' have several elements that reinforce the positive impact 'local value creation.' The most concrete measures can be seen through Samfunnsløftet's allocations and priorities. Samfunnsløftet is the Group's strategy for distributing community benefits to public purposes in Northern Norway, a work managed by a separate department in the Group where the main responsible is the Group Director for Organization and Business Support. The Group collaborates with local communities to understand how the measures affect them and adjusts the work based on evaluations and feedback.

For 2024, MNOK 163 have been allocated to measures under Samfunnsløftet, focusing on arenas, youth, local communities, innovation, knowledge, and sustainability. In addition, MNOK 200 were allocated in 2023 to projects like 'Grønner på.' These funds are strategically distributed to support projects that have a positive effect on the region, focusing on mapping grants, solar cell grants, and green drivers. Below is an overview of allocated funds to the various focus areas in Samfunnsløftet in 2024.

A dedicated website shows the distribution of funds to projects and geography: samfunnsloftet.snn.no.

1. 30 MNOK to Arenaløftet
2. 30 MNOK to Lokalsamfunnsløftet
3. 20 MNOK to Ungdomsløftet
4. 20 MNOK to Innovasjonsløftet
5. 35 MNOK to Kunnskapsløftet
6. 28 MNOK to administration

Samfunnsløftet conducted an evaluation of the entire strategy in 2024, which will be completed in January 2025. A central goal has been to gain insight into Samfunnsløftet's results and impact, and its significance for local communities. The evaluation will describe which measures contribute to positive impact on local communities and how the effect is assessed.

The Department for Society is responsible for maintaining Samfunnsløftet's strategy and allocation of funds to the community. There are 8 people working in the department, who have expertise from various parts of the cultural, social, and business sectors in the region.

There have been no reported human rights violations or deviations related to the Group's activities in 2024. The Department for Sustainability, together with the legal department, has the necessary expertise regarding human rights and indigenous rights.

6.5. Targets

SpareBank 1 Nord-Norge has goals and ambitions related to the material IRO concerning 'Local value creation.' At present, these targets are not in line with the requirements of ESRS, and further development of these targets will be worked on in 2025.

It is also noted that Samfunnsløftet underwent a major evaluation process in 2024, which will lead to a revision of the strategy for the allocation of community benefits, partly based on stakeholder dialogue. In this context, it is planned to set goals for the work that can positively contribute to local value creation.

Targets related to the risk 'Land conflicts in the north' will be further explored in 2025.

7. Consumers and end-users

SpareBank 1 Nord-Norge's source of value creation primarily occurs through the group's customers and end-users. Customers are served through multiple channels based on various parts of the group's value chain. This can have both positive and negative effects on the climate, environment, and society. This chapter describes how the group works to minimize the negative impact and strengthen the positive influence on customers, based on the reporting standard ESRS S4 – Consumers and End-users. The chapter will refer to consumers and end-users as 'Customers.'

In connection with the double materiality assessment in 2024, several types of impacts, risks, and opportunities related to consumers and end-users have been identified. The analysis used to identify these impacts, risks, and opportunities is developed based on the requirements of ESRS 1 and EFRAG's guide on double materiality, and addresses a company's impacts, risks, and opportunities (IRO). In the following chapter, the abbreviation IROs will be used to denote material impacts, risks, and opportunities.

7.1. Link to strategy and business model

SpareBank 1 Nord-Norge has a strategic compass in its business strategy with four guiding principles: sustainability, insight, quality, and customer-oriented. The relationship with customers is crucial for the Group's ability to create value. In connection with the revision of the materiality assessment for 2024, several different aspects highlighted this. Several IROs were identified in the process, of which one impact and two risks were scored as particularly material for the Group (Table 7-1).

Table 7-1:
The Group's material IROs related to customers with associated targets and value chain placement

IRO NAME	IRO CATEGORY	TARGET	PLACEMENT IN VALUE CHAIN		
			UPSTREAM	OWN OPERATIONS	DOWNSTREAM
Access to banking products	Negative impact	To be developed in 2025			X
Greenwashing risk	Risk	To be developed in 2025	X	X	
Personal data	Risk	To be developed in 2025		X	

These are impacts and risks that affect the customer segment in several different areas. Both in terms of specific products offered, the geographical area served, and information handled in connection with customer dialogue. The impact 'Access to banking products' was identified based on the fact that the group, through policies, products, and services, can influence which customers get access to loans. Here, customers in rural areas may experience a negative impact. The value of residential and commercial properties is often lower in rural areas than in central areas, as stated in NOU 2020: 15:1[1]:

> *«Many rural municipalities have uniform, small, uncertain, or stagnant housing markets characterized by low housing prices and weak price growth. Construction costs can often be higher than the property value, which can lead to people not wanting to take out or not getting loans for housing investments.».*

Guidelines from authorities, market value, and banks' priorities in a low-growth market area can make it challenging for customers in rural areas to finance their projects. This affects SpareBank 1 Nord-Norge's customers, as properties in this market area can experience significant value declines, thereby posing a risk due to mortgage falls. This can lead to loans becoming more expensive, or higher equity requirements being imposed on customers in these geographical areas.

In the worst-case scenario, this could lead to some rural areas having difficulty financing house construction or upgrades in the coming years. Increased climate requirements for housing and property from both the EU and Norwegian authorities could also further challenge customers in rural areas. Energy efficiency improvements of properties are costly and will require access to loan financing for many customers. For banks, it is necessary that the collateral object has a value that can be borrowed against. Developments in this area will necessarily be influenced by district policies and measures implemented for home builders and owners outside the major cities.

The risk 'Personal data' is identified through double materiality assessment based on the fact that the group processes personal data about customers on a large scale. The risk applies to all customer relationships the group has, and risk-reducing measures will depend on good support functions and systems in the group's value chain as well as routines for handling and compliance.

The risk related to 'greenwashing' is linked from the materiality assessment to the risk that it occurs, or that the group is accused of greenwashing on products or services offered. For example, green loan products or fund distribution. The greenwashing risk applies both in the private market with the distribution of funds or the sale of green mortgages, and corporate market customers who qualify as part of the Group's green portfolio.

[1] *NOU 2020: 15 - regjeringen.no*

7.2. Policies

SpareBank 1 Nord-Norge has several governance documents that address the IROs identified under this reporting standard. See Table 7-2 for a detailed description of these.

Table 7-2:
Other policies

GOVERNANCE DOCUMENT	DESCRIPTION	RESPONSIBLE	
		OPERATIONAL	APPROVES DOCUMENT
Credit policy	Prioritization of market areas, industries, and exposure the group is willing to take.	Executive vice president Corporate Banking	Board of directors
Policy for sustainability	Describes the overarching guidelines and principles the group works with, including to prevent greenwashing.	Chief Financial Officer	Board of directors
Guidelines for responsible distribution of mutual funds	Describes principles, requirements, and expectations for fund providers when it comes to responsible distribution of funds.	Head of the group's investment firm	Spare- og plasseringsutvalget i SB1-alliansen
Policy for privacy	Describes the group's requirements for handling personal data in all processes, as well as handling deviations and violations of the law.	Executive vice president Organisation and Business Support	Board of directors
NPAP (new produkt approval policy)	Standard to ensure governance and control in change processes for significant products, systems, services, and processes. Includes assessment of both privacy and sustainability to be reviewed by responsible professional environments. This includes evaluating greenwashing risk, privacy risk, and several other risk types.	Chief Risk Officer Ownership of residual risk is determined by the product, system, service, or process that has been risk assessed.	Chief Risk Officer
Green Finance Framework	Defines what the group can classify as green in connection with trading green bonds. It aims to ensure that green loans are made in accordance with the taxonomy's provisions.	Chief Financial Officer	Chief Financial Officer

7.2.1. Access to banking products

The impact 'Access to banking products' is linked to the group's business strategy and vision; For Northern Norway. Specific measures are defined in the group's credit policy, which frames the priorities and key aspects of the group's credit granting work.

Credit approval policies are divided into private and corporate markets. The credit policies provide general provisions on what and who the group finances, and specific provisions for selected products and industries. The credit policy is determined by the board.

7.2.2. Greenwashing risk

The risk related to greenwashing is described with measures in the Sustainability Policy. This policy is revised annually by the board. It defines that the group shall not engage in greenwashing. A control routine for handling greenwashing risk is part of the sustainability department's responsibility and is exercised through NPAP. The risk is also indirectly addressed through the green finance framework, which ensures that green loans are granted in accordance with the EU taxonomy, where technical criteria are developed for the relevant industries. The framework will be updated in line with changes in regulations in the area.

For the distribution of funds, SpareBank 1-alliance's guidelines for responsible distribution of mutual funds apply. The ultimate responsibility lies with the head of the Securities Company at SpareBank 1 Nord-Norge. The guidelines describe requirements and expectations for fund providers. This includes requirements related to climate and environment, and specific requirements that investments should not be made in companies involved in serious violations of human rights or the Geneva Conventions. In 2025, it will be prioritized to establish better definitions to prevent greenwashing at the product level in the relevant guidelines.

7.2.3. Personal data

Personal data is understood as '... *any information relating to an identified or identifiable natural person (the data subject) who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person,*' according to GDPR Article 4 No. 1.

According to the wording, personal data includes, for example, names, addresses, email addresses, social security numbers, fingerprints, iris patterns, dynamic IP addresses, images, videos, voice recordings, and similar information.

The board has the overall responsibility to ensure that the company complies with data protection regulations. The CEO has the ultimate responsibility for ensuring that the basic requirements for processing personal data are met. Furthermore, each group director is responsible for compliance within their area. The group has a data protection officer who has a central, independent, and advisory role in the group related to compliance with data protection regulations. The operationally responsible person will normally be the product owner, system owner, or process owner, depending on the responsibility distribution for each system/process.

This is further defined in the group's Data Protection Policy. This policy aims to safeguard consumer personal data in accordance with the Personal Data Act and the EU General Data Protection Regulation (GDPR). This includes ensuring the human rights obligations that apply to consumers' right to data protection.

7.3. Stakeholder engagement

The company has extensive dialogue with stakeholders. For the risks and impacts identified under this reporting standard, a detailed description can be seen in Table 7-3. Measures taken to reduce the risk or mitigate the negative impact are described in 7.4 Actions.

Table 7-3:
Stakeholder dialogue related to customers

TOPIC / PURPOSE OF DIALOGUE	DIALOGUE FORM	FREQUENCY	RESPONSIBLE FOR ENSURING THE DIALOGUE TAKES PLACE	OUTCOME
Development of measures in the area of privacy	Dialogue with authorities and other stakeholders, such as Finance Norway, on various issues related to privacy.	Ongoing throughout the year	Executive vice president Organisation and Business Support	Updating routines Reporting
Access to banking products in the district	Dialogue with customers Seminars, local meeting places	Ongoing throughout the year	Executive vice president Personal Banking and Executive vice president Corporate Banking	Highlight the issue for the authorities and society
Increased knowledge about greenwashing risk	Dialogue with authorities and other stakeholders, such as Finance Norway and other forums for the financial industry.	Ongoing throughout the year	Chief Financial Officer	Signed the greenwashing pledge Development of routines based on EBA's guidelines for combating greenwashing

The company has established standards for reporting critical issues and undesirable events. Reports can be made through an external reporting channel available via the company's website, snn.no. The handling of the whistleblower will be carried out in accordance with the company's Policy for Reporting and Deviations. The reports will be handled in a safe and predictable manner. All reports of critical issues are handled in accordance with the Procedure for Case Processing for Handling Reports. Furthermore, measures will be taken, if necessary, to protect the whistleblower from retaliation.

The company has not introduced or developed routines and practices to remedy any material negative impact on customers. The company does not assess whether the channels function effectively. Nor does it assess whether customers trust the reporting channels or the associated processes. These are measures that will be considered further in 2025. Stakeholder dialogue is also described in more detail in chapter 1.3.2.

7.4. Actions

The three IROs that the company has defined as material in connection with the double materiality assessment 2024 will have different measures for follow-up.

7.4.1. Access to banking products

SpareBank 1 Nord-Norge has focused on the issue of financing housing in the district in recent years. This has been highlighted through news articles and seminars. The company is participating in the Pilot Senja project, which aims to better facilitate housing construction in the district. The project started in 2023 and will continue until 2025. No further measures have been implemented to handle access to banking products.

Measures developed to address the negative impact of "access to banking products" will depend on the simultaneous development of political instruments for housing in the district and regulation of agricultural legislation.

7.4.2. Greenwashing risk

The company has signed the greenwashing pledge (gronnvasking.no) and has established a policy that the company shall not engage in greenwashing. This is followed up through the company's NPAP process, which aims to identify risks in all new processes and products.

Other measures implemented in 2024 include:

- Labeling of funds in accordance with SFDR (Sustainable Finance Disclosure Regulation). This is intended to make it easier for customers to understand how sustainable a fund is considered to be, so that customers can know more about what they are investing in. This measure affects both the company's own operations and downstream activities.
- A new green finance framework has been developed, forming the basis for what the company can qualify as green loans. The framework has received a Second Party Opinion from ISS ESG, providing verification of which criteria are in line with the EU taxonomy or can otherwise be defined as sustainable.
- Sustainability risk assessments are conducted in all new products and processes (NPAP).

No specific resources have been allocated to manage the risk, but the responsibility will be assigned to managers in the departments responsible for products or services where sustainability is involved. Particular caution should be exercised when using terms such as "sustainable" and "green."

7.4.3. Privacy information

The overarching goal of the Privacy Policy is to have a systematic and risk-based approach to:

- Safeguard the privacy of the registered individuals
- Support business operations by ensuring that the company always has control over its processing of personal data
- Protect the reputation of SNN through the correct handling of personal data
- Ensure compliance with the Personal Data Act and the EU General Data Protection Regulation (GDPR), other relevant privacy regulations, industry standards, and associated internal standards and procedures
- Document compliance

Resources allocated to handle the company's work with personal data privacy include 2 full-time positions, a Data Protection Officer and a Financing Specialist (privacy). Additionally, 13 employees in the company have a coordinating responsibility in their respective departments for handling personal data privacy. All employees and managers also have a responsibility to manage the measures mentioned above, which is carried out through the NPAP process.

The following measures were implemented in 2024: :

- Training in privacy cases for all employees

TOPIC	DESCRIPTION	TARGET GROUP	COMPLETION RATE (%)
Privacy case 2024	Mis-sending of email	All employees	91

- If customers' personal data is compromised, for example, if an email is sent to the wrong recipient, immediate measures will be taken to limit the extent of the deviation. Furthermore, deviations will be reported to the Data Protection Authority if they pose a risk to the rights and freedoms of the registered individuals.

The number of internal registered breaches of personal data security in 2024: 57, of which 8 were reported to the Data Protection Authority. All breaches were handled in accordance with the procedure for handling personal data breaches.

During the year, the internal audit conducted a thorough assessment of the company's framework and processes for privacy, especially focusing on the use of data for analytical purposes. The audit evaluated the company's maturity in the area of privacy and identified several areas for improvement. Observations and assessments were based on documentation and interviews with key personnel. It was found that the company's maturity in the area of privacy has significantly improved over the past two years, with enhanced competence and capacity.

Based on improvement measures identified in the internal audit, compliance report, and report from the Data Protection Officer, systematic improvements have been made, including a particular focus on the processing protocol for the data controller, as well as a separate processing protocol as a data processor.

7.5. Targets

SpareBank 1 Nord-Norge has goals and ambitions related to the material IROs concerning customers. At present, these are not in line with CSRD, the so-called MDR-T requirements (ESRS 2). The company will work on setting new goals in 2025. Nevertheless, the current goals for the areas are addressed below.

7.5.1. Access to banking products

The company's goals in this area are not developed in accordance with the CSRD requirements and are therefore not included in the reporting.

Targets will be further developed in 2025.

7.5.2. Greenwashing risk

The company's goals in this area are not developed in accordance with the CSRD requirements and are therefore not included in the reporting.

Targets will be further developed in 2025.

7.5.3. Privacy information

The company has metrics related to GDPR-related losses in its Risk Strategy, with quarterly reporting on status to the company management. Employees who process personal data in or on behalf of SNN have an independent responsibility to ensure that the data is processed in accordance with the fundamental principles for processing personal data.

Targets will be further developed in 2025 to be in line with CSRD (MDR-T requirements).

8. Business conduct

To ensure growth, economic stability, and trust among customers and society, it is crucial for a financial group to maintain a high standard of business conduct and actively work to prevent financial crime. This chapter shows how the company addresses the topics of financial crime, cybersecurity, corporate culture, and supplier follow-up, and is developed based on the reporting standard ESRS G1 – Business Conduct.

In connection with the double materiality assessment in 2024, several types of impacts, risks, and opportunities related to business conduct have been identified. The analysis used to identify these impacts, risks, and opportunities is developed based on the requirements of ESRS 1 and EFRAG's guide on double materiality, and addresses a company's impacts, risks, and opportunities (IRO). In the following chapter, the abbreviation IROs will be used to denote material impacts, risks, and opportunities.

Reporting on the material IROs identified within this chapter is based on the disclosure requirements G1-1 and G1-2 of the G1 standard. Specifically for the IROs "Cyberattacks and Data Security," "Preventing Financial Crime," and "Liability in Fraud Cases," there has not been a direct link to relevant reporting requirements in the standard. Therefore, the company has chosen to report on these IROs based on the requirements in G1-1 related to business conduct. This has involved reporting on relevant governance documents, measures, and courses.

Table 8-1:
The Group's material IROs related to business conduct with corresponding value chain placement

IRO NAME	IRO CATEGORY	PLACEMENT IN VALUE CHAIN		
		UPSTREAM	OWN OPERATIONS	DOWNSTREAM
Work environment and corporate culture	Positive impact		X	
Accountability and transparency in the supply chain	Negative impact	X		
Cyber attacks and data security	Risk		X	
Preventing economic crime	Positive impact Risk			X
Liability in fraud cases	Risk			X

8.1. Corporate culture

A good working environment and a strong corporate culture are important prerequisites for promoting ethical behaviour, collaboration, and engagement among employees. It will also be an important tool to help counteract financial crime. "Working environment and corporate culture" is therefore identified as a positive impact in the company's double materiality assessment for 2024. A desired corporate culture is influenced by, among other things, the training employees receive, leadership development, governance documents that define how the company's employees should behave, and systems that are developed.

Table 8-2:
Policies related to the material positive impact "Working environment and corporate culture"

IRO	GOVERNANCE DOCUMENT	DESCRIPTION	REPONSIBLE	
			OPERATIONAL	APPROVES DOCUMENT
Working environment and corporate culture	The SNN Code	Ethical guidelines describing how the group's employees should behave.	Executive vice president Organisation and Business Support	Board of Directors

Employees in the company should be characterized by a high ethical standard. This entails an expectation that all employees exhibit trustworthy, honest, and upright behaviour in accordance with applicable laws, regulations, industry standards, internal guidelines, and societal norms. This is further described in the SNN Code, which are ethical guidelines for the company's business operations and strategic goals (Table 8-2).

Training in the guidelines takes place as part of the new employee program that all employees undergo when newly hired in the company. In 2024, an annual review and signing of the SNN Code for all employees was also introduced to ensure that everyone is updated on the current guidelines (Table 8-3). In addition, employees receive a number of mandatory courses that address good business conduct and the work against financial crime. These contribute to ensuring that the company's employees have the competence they need, thereby strengthening the company's compliance with good business conduct.

Table 8-3:
Completion rate of signing the SNN Code

COURSE NAME	TARGET GROUP	PURPOSE	COMPLETION RATE (%)
The SNN Code	All employees	Raise awareness among SNN's employees about the ethical guidelines and how to handle ethical challenges through repetition of the SNN Code and ethical dilemmas. Mandatory annual signing by all employees.	89

At SpareBank 1 Nord-Norge, there should be a low threshold for reporting critical issues or breaches of the SNN Code. Employees have the right to report critical issues and can do so through internal reporting or the company's external reporting channel. For external reporting, there are four reporting methods available: web, letter, phone, or QR code. The external reporting channel is managed by Ernst & Young, an independent third party that receives the report on behalf of the employer and provides advice on further follow-up. The external reporting channel ensures full anonymity for the whistleblower while providing the company with the necessary information to handle the content of the report. The company's Procedure for Case Processing for Handling Reports ensures that reports are handled confidentially, with a limited number of people having access to the case, and the whistleblower's identity is not disclosed as far as is reasonable. Furthermore, measures will be taken, if necessary, to protect the whistleblower from retaliation. Breaches of guidelines or relevant legal provisions may have consequences for the employment relationship. This is further described in the SNN Code and the procedure for handling breaches of guidelines, authorizations, and legislation.

8.2. Supplier follow-up

Table 8-4:
Policies related to the material negative impact «Accountability and transparency in the supply chain»

IRO	GOVERNANCE DOCUMENT	DESCRIPTION	RESPONSIBLE: OPERATIONAL	RESPONSIBLE: APPROVES DOCUMENT
Accountability and transparency in the supply chain	– Standard for procurement, requirements for suppliers regarding sustainability and business ethics – Standard for compliance with the Transparency Act	Describes the requirements and expectations for procurement carried out in the SpareBank 1 alliance and local procurement in SNN	Executive vice president Organisation and Business Support	Executive vice president Organisation and Business Support CFO

The Transparency Act came into force in 2022 and has led to increased public attention and expectations regarding the management of a company's supply chain. As a significant purchaser of goods and services, both locally and nationally, the SpareBank 1 alliance and SpareBank 1 Nord-Norge have a responsibility and an opportunity to influence the transition to a greener and more just society.

Procurement for the Group mainly occurs in two ways: either through direct purchases by SpareBank 1 Nord-Norge's facilities management department or on behalf of the SpareBank 1 alliance through the jointly owned SpareBank 1 Utvikling (alliance procurement). In both cases, requirements for sustainability and business ethics must be based on the applicable governance documents in the area.

The Group has identified "Accountability and transparency in the supply chain" as a negative impact due to the size and complexity of the group's value chain. Sustainable procurement involves, among other things, the suppliers' awareness of their own supply chain and the work they do to reduce negative impacts on the environment, social conditions, and ethical business practices.

By setting requirements for suppliers and business partners to have guidelines on sustainability and to translate these into action, the group uses its purchasing power to influence the supply chain to work more sustainably. When contracts are entered into with new suppliers, requirements for sustainability and business ethics are presented. The group expects suppliers to be aware of sustainability risks in their own operations and supply chain and to follow the UN Guiding Principles on Business and Human Rights (UNGP) and the OECD Guidelines for Multinational Enterprises. Furthermore, overall assessments are made before entering into contracts, such as whether the initiative contributes to a transition to a low-emission society and whether the initiative contributes to the group's desire for a clear environmental profile.

Alliance procurement has developed clear requirements and expectations, systematic follow-up, and collaboration with suppliers on behalf of the SpareBank 1 Alliance. This contributes to continuous improvement of the supply chains.

Sustainability work in 2024 has been somewhat different from previous years. Due to increasing regulatory requirements, Alliance procurement, like many others, has focused on cleaning up, revising, and setting up new and improved structures and methods. This is to become more efficient and ensure compliance with upcoming legal requirements and expectations.

The following specific activities have been carried out during 2024:

- Initiated work to systematize stakeholder involvement
- Supplier survey on climate accounting
- Contract revision
- Implementation of the supplier management tool Hellios
- Supplier screening
- Climate footprint in cloud services and data centres
- Double materiality assessment

Alliance procurement believes that the implementation of Hellios will particularly strengthen the joint work on supplier management and risk assessment towards the alliance's third parties. With a more systematic approach to the supplier base, it will be easier to select relevant suppliers for closer follow-up.

While the majority of significant purchases are made through the alliance collaboration, SpareBank 1 Nord-Norge also has a local supplier base. In addition to the ongoing collaboration with Alliance procurement, the group considers it important to map "local" suppliers and business partners to assess risk. With a broad supplier base, it can be challenging to map all connections. Therefore, it is a goal in itself that sustainability assessments are made as early as possible in the procurement process. The group emphasizes, among other things, the use of standard terms in all agreements entered into, as well as systematic assessments before contract signing.

More detailed information about the sustainability work towards the supplier base in general, and the Transparency Act in particular, will be explained in the group's Transparency Act Statement, which will be published in the group's sustainability library on snn.no by 30.06.2025.

8.3. Work on information security

The digital threat landscape is constantly changing, which also affects the risk profile of SpareBank 1 Nord-Norge. Økokrim points out in its threat assessment for 2024 that criminal actors have very good technological competence, which they continuously develop, making it more challenging to detect suspicious transactions. The group has identified "Cyberattacks and data security" as a material risk that can have financial consequences for the Group through its double materiality assessment, as the Group's technologies can be used for illegal activities. The threat landscape related to cyberattacks particularly sharpens the requirements for digital resilience, supplier follow-up, and crisis management. At the same time, artificial intelligence (AI) can be used to increase the capacity of threat actors and further challenge information security.
In recent years, the group has implemented several measures to address the most critical vulnerabilities and strengthen information security, including cybersecurity. Table 8-5 addresses policies related to this risk.

Table 8-5:
Policies related to the material risk «Cyberattacks and data security»

IRO	GOVERNANCE DOCUMENT	DESCRIPTION	RESPONSIBLE: OPERATIONAL	RESPONSIBLE: APPROVES DOCUMENT
Cyberattacks and data security	Policy for information security for the group	The purpose of the Policy for Information Security is to establish overarching principles for securing information, information processing, and information systems in the SpareBank 1 Nord-Norge group. The policy was revised in the autumn of 2024.	Executive vice president Organisation and Business Support	Board of Directors
	Risk strategy	Establishes the group's risk willingness qualitatively and quantitatively. Includes metrics related to cyber incidents and phishing exercises.	Chief Risk Officer	Board of Directors

Monitoring and operational handling of cyber incidents are led by SpareBank 1 Utvikling/Incident Response Team (IRT) on behalf of the alliance. Local resources in the group are involved as needed and according to the contingency plan. There have been no major incidents in this area in 2024.

Actions 2024

The following mechanisms to identify, report, and investigate incidents related to information security have been implemented:

DORA
DORA (Digital Operational Resilience Act) is a new EU regulation aimed at strengthening the digital resilience of the financial sector. DORA aims to manage and reduce digital risks, harmonize regulations, and create equal competitive conditions for financial institutions. The regulation has extensive requirements for digital security, resilience, and preparedness. The regulation came into force in the EU on January 17, 2025, and is expected to be implemented in Norway in the summer of 2025.

Key Actions for DORA in 2024:

- SNN received a maturity analysis from Deloitte at the turn of the year 2023/2024 with several recommendations regarding the implementation of DORA in SNN. These will be taken into account in the implementation.
- An internal project setup for the implementation of DORA was established in September 2024. The project consists of internal experts, and external consultants are hired as needed. The project is initially scheduled to last until the summer of 2025, with the possibility of extension depending on the implementation date of the DORA regulation in Norway and the scope revealed in the further work.
- In the autumn of 2024, a Business Impact Analysis (BIA) was conducted in SNN for the parent bank with assistance from an external consultant. The analysis resulted in a report, a routine description, and a PowerBI dashboard. This will be used further in business continuity work and is considered a significant part of the DORA implementation.
- In December 2024, a BIA analysis for SNN Finans was initiated, and the analysis is expected to be completed by the end of January 2025. This, together with the analysis for the parent bank, will be included in further work on business continuity.

Planned Actions for 2025:

- The internal project team is currently reviewing the DORA regulation along with underlying documents to identify the requirements and measures that need to be implemented within the group. This is expected to be completed during Q1 2025.
- The internal project team will begin working on closing identified gaps during Q1 2025, and the work will continue throughout the year.
- An internal audit of the implementation is planned for mid-February 2025.

Reporting, Measurements, Testing, and Training

- In the group's risk strategy, cyber risk is included under operational risk, specifically as technology risk, with quarterly reporting to the board on the area.
- Annual measurements are conducted on the number of successful attacks against the group.
- Regular phishing tests are carried out for all employees in the group as part of efforts to strengthen the security culture.
- Training has been conducted for the group management, new leaders, and some other leadership groups in security, preparedness, and crisis management. The training will continue in 2025.
- Training has been conducted for all new employees in the group in security, information security, and preparedness. The training will continue in 2025.

According to the document "Competence Requirements in SNN," annual measures are taken to raise employees' competence in information security. Table 8-6 shows courses in information security that were mandatory for all employees in 2024.

Table 8-6:
Courses in information security for the Group's employees in 2024

TOPIC	TARGET GROUP	COMPLETION RATE (%)
Passopp: Cyber threats against SpareBank 1 in 2024	All employees	87
Passopp: Digital footprints	All employees	86
Passopp: Think safety – even on vacation	All employees	83
Passopp: Confidentiality	All employees	80
Passopp: Safety in an uncertain world	All employees	69
Safety culture survey 2024	All employees	73

8.4. Economic crime

Economic crime undermines the integrity of the economic system in any society. The financial industry has a special role in preventing this and is also exposed to risks in the form of central infrastructure being used as a tool for criminal or unethical actions.

In its double materiality assessment, the group has identified "Liability in fraud cases" as a material risk. Furthermore, "Preventing economic crime" has been identified both as a positive impact and a risk. Table 8-7 addresses the relevant policies related to these material IROs.

Economic crime is defined as:

- **Money laundering** of illegal proceeds is a process aimed at concealing the origin of proceeds earned through illegal activities, making them appear legal. This can occur through the use of bank products and services.
- **Corruption** involves the misuse of power by the group's employees for personal gain. This can include bribery or extortion of the group's employees, influence peddling, or the use of facilitation payments to achieve illegal financial gain or other undue advantage.
- **Fraud** involves deception or trickery to achieve financial or personal gain. For example, a bank customer may be manipulated into giving away login information to the group's payment functions.

Table 8-7:
Policies related to the material IROs «Preventing economic crime» and «Liability in fraud case»

IRO	GOVERNANCE DOCUMENT	DESCRIPTION	RESPONSIBLE	
			OPERATIONAL	APPROVES DOCUMENT
Preventing economic crime (positive impact and risk)	Policy for anti-money laundering, combating terrorist financing, and international sanctions for the group	Shall contribute to SpareBank 1 Nord-Norge taking an active role in combating money laundering and terrorist financing. The policy meets the requirements set forth in Section 8 of the Money Laundering Act and applies to the SpareBank 1 Nord-Norge group.	Executive vice president Organisation and Business Support	Board of Directors
Liability in fraud cases	Procedures for handling complaints	The bank's liability follows the Financial Contracts Act and applicable case law. Current procedures meet the requirements set forth in the Financial Contracts Act and are updated with new case law provided by the Financial Complaints Board Bank or the courts.	Executive vice president Personal Banking	Executive vice president Personal Banking

All the group's functions can be exposed to economic crime. However, the most vulnerable functions are the group's customers, online and mobile banking systems, and certain industries financed by the group, which are subject to additional follow-up through the credit process. Combating economic crime is followed up in all business relationships the group has, and active efforts are made to prevent, detect, and report transactions related to criminal activities. This includes the prevention of money laundering, fraud, and corruption. In summary, the established measures and processes discussed in this subchapter contribute to combating economic crime and have a positive impact on society. This is because crime can actually be detected and stopped through the group's functions, and because awareness and knowledge about this can be attitude-forming and enlightening for society.

An important measure to detect economic crime or undesirable business behaviour is the availability of whistleblowing channels for the group's employees, customers, and society. Employees can report internally or through an external whistleblowing channel. Customers and society at large can report through the whistleblowing channel available on the group's website, snn.no. Here, external parties can report on critical matters they believe are in violation of regulatory requirements, the group's ethical guidelines, or ethical rules that are generally recognized in society. The reports will be handled in a safe and predictable manner.

Other measures include:

- Register of ownership interests among employees (to avoid/reveal conflicts of interest).
- Monitoring of transactions (which also includes employees).
- Various preventive work, including training in ethical issues, conflicts of interest, etc.

Over the past year, the group has strengthened several functions with expertise in combating economic crime. The group has a dedicated anti-money laundering department, and both the corporate and retail business areas have been strengthened with their own resources in this field during 2024.

When investigating suspected corruption or bribery, an initial assessment is made to determine whether there are grounds for further follow-up. Relevant data and documentation are then collected and analysed. If deemed appropriate, relevant parties will be involved. A report is then prepared with a summary, assessment, and conclusion of the matter, which the decision-maker either approves or rejects. A specific responsibility matrix has been developed for handling and escalating such cases. If the report is approved, the consequence of the matter is implemented, for example, reporting to the police or reporting suspicious activity to Økokrim.

Training in the area

According to the document "Competence Requirements in SNN," annual competence measures related to anti-money laundering are to be carried out. Table 8-8 shows relevant courses for the group's employees in 2024. The courses are common for the entire SpareBank 1 alliance, with some courses also being mandatory for the board.

Table 8-8:
Courses in economic crime for the Group's employees in 2024

TOPIC	TARGET GROUP	PURPOSE	COMPLETION RATE (%)
Cash in store	CB/PB	Understand the risks of the service and know what to do if you suspect money laundering	94
Money laundering risk in real estate transactions	CB/PB	Know the risks of money laundering in connection with real estate transactions and the prevention of this	87
Terror financing	All employees	Review historical and new current threats	88
High-risk industries	CB	Knowledge of high-risk industries and certain measures to detect money laundering and terrorist financing	82
Cryptocurrency	CB/PB	Overview of the key trends in fraud and money laundering	92
General update	All employees	Refresher on money laundering rules	84
Sanctions	CB	Sanctions regulations: who adopts them, how they are enforced, and consequences of violations	92
Trends	CB/PB	Update on the latest trends in the AML area	85

In addition to the courses in Table 8-8, a deep-dive course in the AML area for specialists with a focus on risk assessment, customer measures, investigation, and reporting was assigned at the end of the year. It is the responsibility of the leader to ensure that the courses are completed. Completion rates at the unit level are followed up by the HR department, and the group director receives quarterly reports on the status of their unit.

8.4.1. Work on anti-money laundering

Some specific actions to identify, report, and investigate incidents in 2024:

- In the group's risk strategy, the work to combat money laundering is included under compliance risk with quarterly reporting to the board on the area.
- Screening of business relationships for all BM customers > 5 MNOK through the ESG module.
- When establishing customer relationships, information and documentation about the customer relationship are collected. The customer is then risk-assessed within the group's established risk segment, which forms the basis for the risk-based customer measures the customer relationship is subject to and the frequency of activities the group carries out during ongoing follow-up of the customer relationship.
- Electronic customer and transaction monitoring:
  - All transactions and customer relationships are subject to electronic transaction monitoring. The group has established rules in transaction monitoring in line with the group's risk assessment and adapted to the group's established risk segment.
  - Flagged transactions in the system are assessed and handled by a specialist department in the group in its own case management system, and suspicious transactions (ST) are reported to Økokrim in the form of ST reports.
- The group conducts an annual business-oriented risk assessment. This assessment provides a comprehensive overview of the total risk related to economic crime that the group faces, divided by identified risk drivers. This serves as a basis for developing procedures, customer measures, and risk classification at the customer level.
- A separate risk assessment process has been established for new products, services, and systems.
- Internal control routines have been established to ensure that the group manages identified risks and complies with legal requirements. Suitability assessments are conducted for the compliance officer, anti-money laundering officer, and employees in the anti-money laundering department.
- Collaboration with relevant authorities is established where necessary to detect and combat economic crime.
- It has been decided to increase the capacity of the anti-money laundering department by 8 full-time positions to strengthen efforts against economic crime.

8.4.2. Work to prevent fraud

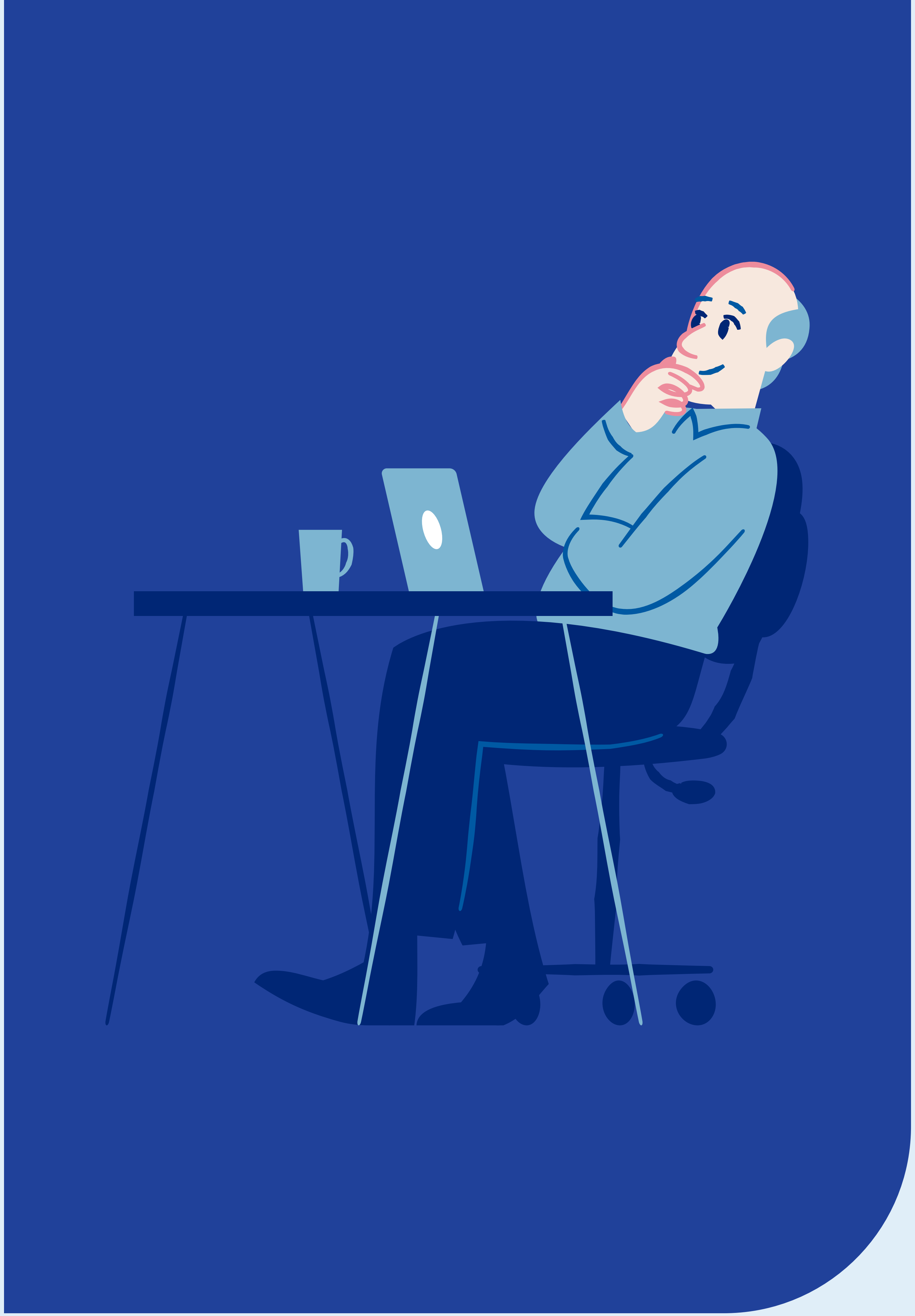
Liability in fraud cases is defined as a separate risk due to the increase in fraudulent activities in society and the increased responsibility of banks in fraud cases through an amendment to the Financial Institutions Act in 2024. The Supreme Court has established that banks have primary responsibility for losses from unauthorized transactions, especially misuse of BankID. In the group's Risk Strategy, the work to prevent fraud cases is included under compliance risk with quarterly reporting to the board on the area.

Status/Results

- Number of fraud cases handled in 2024: 3525. This number includes cases where customers have reported fraud with losses to the group, predominantly private customers. In fraud, there are expected to be unreported cases where fraud is not reported to the bank, particularly fraud affecting businesses and organizations where individual cases often involve larger amounts.

Some specific actions to identify, report, and investigate incidents in 2024

- Established a dedicated contact point in the Group's customer centre for customers exposed to fraud.
- Mapped and optimized processes within fraud handling.
- Development work in the application of technology for prevention and detection of fraud.
- Implemented targeted preventive measures in the group's digital solutions.
- Preventive activities through knowledge sharing with customers.



Appendices

APPENDIX
ESRS INDEKS

	Reference to ESRS		Chapter number	Chapter name
General information	**ESRS 2**	**ESRS E1, E2, E3, E4, E5, S1, S3, S4, G1**	**1**	**General information**
	BP-1		1.1.1	Basis for the sustainability statement
	BP-2		1.1.2	Specific circumstances
	GOV-1		1.2.1	Administration, Management, and Supervisory bodies
	GOV-1	G1 § 5 (b)	1.2.1.3.	Competence
	GOV-2		1.2.2.	DIsclosure and Handling of Sustainability Matters
	GOV-3	E1 § 13	1.2.3.	Sustainability-related incentive schemes
	GOV-4		1.2.4.	Due diligence
	GOV-5		1.2.5.	Risk management related to sustainability reporting
	SBM-1		1.3.1	Strategy, business model, and value chain
	SBM-2	S1 § 12 S3 § 7 S4 § 8	1.3.2	Stakeholder Engagement
	SBM-3		1.3.3	Material IROs
	IRO-1	E1: § 20-21 E2: § 11 E3: § 8 E4: § 17-19 E5: § 11 G1: § 6	1.4.1	Identification and assessment of IROs
	IRO-1		1.4.2	Risk management process of IROs
	IRO-2		1.4.3.	Coverage of ESRS reporting requirements
Environment			**2**	**EU Taxonomy**
	ESRS 2	**ESRS E1**	**3**	**Climate change**
	SMB-3	SBM-3	3.1	Connection to strategy and business model
	SMB-3	SBM-3	3.2	The group's resilience to climate change
		E1-1*	3.3	Transition plan
	MDR-P	E1-2	3.4	Policies
	MDR-A	E1-3	3.5	Actions
	MDR-T	E1-4	3.6	Targets
		E1-5	3.7	Energy consumption and mix
		E1-6	3.8	Greenhouse gas accounting
		E1-7	NA	Not material
		E1-8	NA	Not material
		E1-9	3.9	Financial effects from climate risk and opportunities

*SNN reports on E1-1 § 17

	Reference to ESRS		Chapter number	Chapter name
Environment	**ESRS 2**	**ESRS E4**	**4**	**Biodiversity and ecosystems**
	SBM-3	SBM-3	4.1	Connection to strategy and business model
		E4-1	4.1	Connection to strategy and business model
	MDR-P	E4-2	4.2	Policies
	MDR-A	E4-3	4.3	Actions
	MDR-T	E4-4	4.4	Targets
		E4-5	NA	Not material
		E4-6	NA	Not material
Social	**ESRS 2**	**ESRS S1**	**5**	**Own workforce**
	SBM-3	SBM-3	5.1	Link to strategy and business model
	MDR-P	S1-1	5.2	Policies
		S1-2	5.3	Stakeholder engagement
		S1-3	5.11	Reporting and undesirable incidents
	MDR-A	S1-4	5.7-5.10	Actions
	MDR-T	S1-5	5.4	Targets
		S1-6 S1-7	5.5	Number of employees
		S1-6	5.6	Turnover
		S1-8	5.7	Collective agreements
		S1-9	5.8	Diversity and inclusion
		S1-10	NA	Not material
		S1-11	NA	Not material
		S1-12	NA	Not material
		S1-13	5.9	Competence development
		S1-14	5.10	HSE and sick leave
		S1-15	NA	Not material
		S1-16	NA	Not material
		S1-17	5.11	Reporting and undesirable incidents
	ESRS 2	**ESRS S3**	**6**	**Affected communities**
	SBM-3	SBM-3	6.1	Link to strategy and business model
	MDR-P	S3-1	6.2	Policies
		S3-2 S3-3	6.3	Stakeholder engagement
	MDR-A	S3-4	6.4	Actions
	MDR-T	S3-5	6.5	Targets
	ESRS 2	**ESRS S4**	**7**	**Consumers and end-users**

	REFERENCE TO ESRS		CHAPTER NUMBER	CHAPTER NAME
Social	SBM-3	SBM-3	7.1	Link to strategy and business model
	MDR-P	S4-1	7.2	Policies
		S4-2 S4-3	7.3	Stakeholder engagement
	MDR-A	S4-4	7.4	Actions
	MDR-T	S4-5	7.5	Targets
Governance	**ESRS 2**	**ESRS G1**	**8**	**Business Conduct**
		G1-1	8.1	Corporate culture
		G1-2	8.2	Supplier follow-up
		G1-1	8.3	Work with information security
		G1-1	8.4	Economic crime
		G1-3	NA	Not material
		G1-4	NA	Not material
		G1-5	NA	Not material

APPENDIX
DATA POINTS FROM OTHER EU LEGISLATION (APPENDIX B)

DR AND RELATED POINT	SFDR REFERENCE	PILLAR 3 REFERENCE	BENCHMARK REGULATION REFERENCE	EU CLIMATE LAW REFERENCE	COMMENT	REFERENCE TO REPORT
ESRS 2 GOV-1 Board's gender diversity paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816, Annex II		Material	1.2.1.1
ESRS 2 GOV-1 Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II		Material	1.2.1.1
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1				Material	1.2.4.
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities paragraph 40 (d) i	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk	Delegated Regulation (EU) 2020/1816, Annex II		Not material	
ESRS 2 SBM-1 Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II		Not material	
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not material	
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II		Not material	
ESRS E1-1 Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)	Not reported in 2024 (SNN reports on §17)	3.3
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article12.1 (d) to (g), and Article 12.2		Not reported in 2024 (SNN reports on §17)	3.3
ESRS E1-4 GHG emission reduction targets paragraph 34	Indicator number 4 Table #2 of Annex 1	"Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics"	Delegated Regulation (EU) 2020/1818, Article 6		Not reported in 2024 (SNN reports that no goals have been set §33)	3.6
ESRS E1-5 Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1				Not material	
ESRS E1-5 Energy consumption and mix paragraph 37	Indicator number 5 Table #1 of Annex 1				Material	3.7
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1				Not material	
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity			Material	3.8
ESRS E1-6 Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)		Material	3.8

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DATA POINTS FROM OTHER EU LEGISLATION (APPENDIX B)

DR AND RELATED POINT	SFDR REFERENCE	PILLAR 3 REFERENCE	BENCHMARK REGULATION REFERENCE	EU CLIMATE LAW REFERENCE	COMMENT	REFERENCE TO REPORT
ESRS E1-7 GHG removals and carbon credits paragraph 56				Regulation (EU) 2021/1119, Article 2(1)	Not material	
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks paragraph 66			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II		Material	3.9
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a) ESRS E1-9 Location of significant assets at material physical risk paragraph 66 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.			Material	3.9
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).		Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34;Template 2:Banking book -Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral			Material	3.9
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II		Material	3.9
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1				Not material	
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex 1				Not material	
ESRS E3-1 Dedicated policy paragraph 13	Indicator number 8 Table 2 of Annex 1				Not material	
ESRS E3-1 Sustainable oceans and seas paragraph 14	Indicator number 12 Table #2 of Annex 1				Not material	
ESRS E3-4 Total water recycled and reused paragraph 28 (c)	Indicator number 6.2 Table #2 of Annex 1				Not material	
ESRS E3-4 Total water consumption in m 3 per net revenue on own operations paragraph 29	Indicator number 6.1 Table #2 of Annex 1				Not material	
ESRS 2- SBM 3 - E4 paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1				Not material	
ESRS 2- SBM 3 - E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1				Material	4.1
ESRS 2- SBM 3 - E4 paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1				Material	4.1
ESRS E4-2 Sustainable land / agriculture practices or policies paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1				Material	4.2
ESRS E4-2 Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1				Material	4.2
ESRS E4-2 Policies to address deforestation paragraph 24 (d)	Indicator number 15 Table #2 of Annex 1				Material	4.2

DATA POINTS FROM OTHER EU LEGISLATION (APPENDIX B)

DR AND RELATED POINT	SFDR REFERENCE	PILLAR 3 REFERENCE	BENCHMARK REGULATION REFERENCE	EU CLIMATE LAW REFERENCE	COMMENT	REFERENCE TO REPORT
ESRS E5-5 Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1				Not material	
ESRS E5-5 Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1				Not material	
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 Table #3 of Annex I				Not material	
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 Table #3 of Annex I				Not material	
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I				Material	5.2
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21			Delegated Regulation (EU) 2020/1816, Annex II		Material	5.2
ESRS S1-1 processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex I				Not relevant	5.2
ESRS S1-1 workplace accident prevention policy or manage-ment system paragraph 23	Indicator number 1 Table #3 of Annex I				Material	5.2
ESRS S1-3 grievance/complaints handling mechanisms para-graph 32 (c)	Indicator number 5 Table #3 of Annex I				Material	5.11
ESRS S1-14 Number of fatalities and number and rate of work-related accidents paragraph 88 (b) and (c)	Indicator number 2 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Material	5.11
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3 Table #3 of Annex I				Material	5.11
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II		Not material	
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex I				Not material	
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicator number 7 Table #3 of Annex I				Material	5.11
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)		Material	5.11
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1				Not material	
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4 Table #3 of Annex 1				Not material	
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Not material	

DATA POINTS FROM OTHER EU LEGISLATION (APPENDIX B)

DR AND RELATED POINT	SFDR REFERENCE	PILLAR 3 REFERENCE	BENCHMARK REGULATION REFERENCE	EU CLIMATE LAW REFERENCE	COMMENT	REFERENCE TO REPORT
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19			Delegated Regulation (EU) 2020/1816, Annex II		Not material	
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain paragraph 36	Indicator number 14 Table #3 of Annex 1				Not material	
ESRS S3-1 Human rights policy commitments paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1				Material	6.2
ESRS S3-1 Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Indicator number 10 Table #1 Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Material	6.2
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1				Material	6.3
ESRS S4-1 Policies related to consumers and end-users paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1				Material	7.2
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)		Material	7.2
ESRS S4-4 Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1				Material	7.3
ESRS G1-1 United Nations Convention against Corruption paragraph 10 (b)	Indicator number 15 Table #3 of Annex 1				Material	8.1
ESRS G1-1 Protection of whistle- blowers paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1				Not material	
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II)		Not material	
ESRS G1-4 Standards of anti- corruption and anti- bribery paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1				Material	8.4

APPENDIX
CALCULATION METHODOLOGY FOR OPERATIONAL EMISSIONS

Some of the emissions in the group's climate accounts are referred to as operational emissions, which include Scope 1, Scope 2, and upstream Scope 3 (categories 1-8). To calculate the operational emissions, different types of data are combined depending on the availability of these. Overall, two types of data are distinguished:

1. Physical data

Primary data made available from specific activities in SpareBank 1 Nord-Norge's value chain. This can, for example, be fuel consumption (L), electricity consumption (kWh), or passenger kilometres from air travel (km). The emissions are then calculated by multiplying the primary data with a corresponding emission factor. Asplan Viak AS has assisted the group in obtaining and making available relevant emission factors. Table 1 shows the emission factors used for the various physical data.

Table 1:
Emission factors used in the calculation of emissions related to the group's physical data

PHYSICAL DATA	EMISSION REPORTED IN	VALUE EMISSION FACTOR
Fuel consumption gasoline (L)	Scope 1	2,4199275
Fuel consumption gasoline (L)	Scope 3 cat. 3	0,71900793
Fuel consumption gasoline (L)	Scope 1	2,6500747
Fuel consumption gasoline (L)	Scope 3 cat. 3	0,6899975
Electricity consumption without origin guarantee (kWh)	Scope 2 market-based	0,599
Electricity consumption without origin guarantee (kWh)	Scope 2 market-based	0,004402235
Total electricity consumption (kWh)	Scope 2 location-based	0,032810837
Total electricity consumption (kWh)	Scope 3 categori 3 location-based	0,01327374
District heating consumption (kWh)	Scope 2	0,11233383
Passenger kilometres from air travel (km)	Scope 3 cat. 6	0,27089717
Mileage allowance (km)	Scope 3 cat. 6	0,17719228

2. Economic data (Spend-Based method)

Economic data from the accounts is used when the group does not have access to physical data. This typically includes costs related to purchased goods and services, which are then used to calculate the associated emissions. The emissions related to the economic data are estimated based on emission factors from Asplan Viak AS's Klimakost model.

The Klimakost model is based on EE-IOA (environmentally extended input-output analysis) and LCA (life cycle assessment). In an environmentally extended input-output analysis, emissions and activity data from industry sectors (NACE rev2) are used to calculate the emissions that a given purchase within each sector contributes to. NACE is a standard classification for the EU, used by FIGARO (the EU's statistical database that shows trade flows worldwide) and by SSB when they prepare input-output models for Norway. Asplan Viak has developed economic factors (NACE factors), which can be used to estimate greenhouse gas emissions from the use of a financial unit (e.g., NOK) within an economic sector, based on, among other things, FIGARO.[1]

FIGARO is updated annually, but with a two-year delay. Through account plan matching, accounts in a company's chart of accounts are linked to the sector or sectors that best represent the type of purchase and further to the relevant NACE factors. Emissions per account are then calculated based on the expensed amount and the emission factor. This methodology is also referred to as the spend-based method. The majority of the group's operational-related emissions are estimated based on this methodology.

Data Quality

Primary data is considered to be high-quality data as it is directly related to the activity that generates emissions. Such data will therefore provide a more accurate picture of the emissions an activity is responsible for. For operational-related emissions in Scope 3, 7.20 % of the emissions are covered by primary data.

Economic data, on the other hand, is combined with sector-average emission factors to calculate emissions associated with a given cost. It is important to note that average factors represent an average and therefore may not necessarily be representative of individual activities. There will therefore be greater uncertainty associated with emission figures calculated using the spend-based method.

[1] *FIGARO is updated annually, but with a two-year delay.*

To the General Meeting of Sparebank 1 Nord-Norge

Independent Sustainability Auditor's Limited Assurance Report

Limited Assurance Conclusion

We have conducted a limited assurance engagement on the consolidated sustainability statement of Sparebank 1 Nord-Norge (the «Company»), included in Sustainability statement of the Board of Directors' report (the «Sustainability Statement»), as at 31 December 2024 and for the year then ended.

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the Sustainability Statement is not prepared, in all material respects, in accordance with the Norwegian Accounting Act section 2-3, including:

- compliance with the European Sustainability Reporting Standards (ESRS), including that the process carried out by the Company to identify the information reported in the Sustainability Statement (the «Process») is in accordance with the description set out in 1.4 Double Materiality Assessment; and
- compliance of the disclosures in 2. EU Taxonomy of the Sustainability Statement with Article 8 of EU Regulation 2020/852 (the «Taxonomy Regulation»).

Basis for Conclusion

We conducted our limited assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance engagements other than audits or reviews of historical financial information («ISAE 3000 (Revised)»), issued by the International Auditing and Assurance Standards Board.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion. Our responsibilities under this standard are further described in the Sustainability Auditor's Responsibilities section of our report.

Our Independence and Quality Management

We have complied with the independence and other ethical requirements as required by relevant laws and regulations in Norway and the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants (IESBA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

The firm applies International Standard on Quality Management 1, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Emphasis of Matter – Restatement of sustainability report

This assurance report replaces our previously issued assurance report dated 05.03.25. As described in the Statement from the Board and the Group CEO, management has issued a new sustainability report, due to the identification of omitted greenhouse gas emissions from one alliance company in scope 3 category 15, subsequent to the issuance of the sustainability report. We refer in this context to the Company's sustainability report chapter 3.8, Table 3.8.

Our conclusion is not modified as a result of this matter.

Our procedures on subsequent events are restricted solely to the changes as described in chapter 3.8, table 3-8.

Other Matter

The comparative information included in the Sustainability Statement was not subject to an assurance engagement. Our conclusion is not modified in respect of this matter.

Responsibilities for the Sustainability Statement

The Board of Directors and the Managing Director (Management) are responsible for designing and implementing a process to identify the information reported in the Sustainability Statement in accordance with the ESRS and for disclosing this Process in 1.4 Double Materiality Assessment of the Sustainability Statement. This responsibility includes:

- understanding the context in which the Group's activities and business relationships take place and developing an understanding of its affected stakeholders;
- the identification of the actual and potential impacts (both negative and positive) related to sustainability matters, as well as risks and opportunities that affect, or could reasonably be expected to affect, the Group's financial position, financial performance, cash flows, access to finance or cost of capital over the short-, medium-, or long-term;
- the assessment of the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate thresholds; and
- making assumptions that are reasonable in the circumstances.

Management is further responsible for the preparation of the Sustainability Statement, in accordance with the Norwegian Accounting Act section 2-3, including:

- compliance with the ESRS;
- preparing the disclosures in 2. EU Taxonomy of the Sustainability Statement, in compliance with the Taxonomy Regulation;
- designing, implementing and maintaining such internal control that Management determines is necessary to enable the preparation of the Sustainability Statement that is free from material misstatement, whether due to fraud or error; and
- the selection and application of appropriate sustainability reporting methods and making assumptions and estimates that are reasonable in the circumstances.

Inherent limitations in preparing the Sustainability Statement

In reporting forward-looking information in accordance with ESRS, Management is required to prepare the forward-looking information on the basis of disclosed assumptions about events that may occur in the future and possible future actions by the Group. Actual outcomes are likely to be different since anticipated events frequently do not occur as expected.

Sustainability Auditor's Responsibilities

Our responsibility is to plan and perform the assurance engagement to obtain limited assurance about whether the Sustainability Statement is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence decisions of users taken on the basis of the Sustainability Statement as a whole.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised) we exercise professional judgement and maintain professional scepticism throughout the engagement.

Our responsibilities in respect of the Sustainability Statement, in relation to the Process, include:

- Obtaining an understanding of the Process, but not for the purpose of providing a conclusion on the effectiveness of the Process, including the outcome of the Process;

- Considering whether the information identified addresses the applicable disclosure requirements of the ESRS; and
- Designing and performing procedures to evaluate whether the Process is consistent with the Company's description of its Process set out in 1.4 Double Materiality Assessment.

Our other responsibilities in respect of the Sustainability Statement include:

- Identifying where material misstatements are likely to arise, whether due to fraud or error; and
- Designing and performing procedures responsive to where material misstatements are likely to arise in the Sustainability Statement. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

Summary of the Work Performed

A limited assurance engagement involves performing procedures to obtain evidence about the Sustainability Statement. The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

The nature, timing and extent of procedures selected depend on professional judgement, including the identification of disclosures where material misstatements are likely to arise in the Sustainability Statement, whether due to fraud or error.

In conducting our limited assurance engagement, with respect to the Process, we:

- Obtained an understanding of the Process by:
  - performing inquiries to understand the sources of the information used by management (e.g., stakeholder engagement, business plans and strategy documents); and
  - reviewing the Company's internal documentation of its Process; and
- Evaluated whether the evidence obtained from our procedures with respect to the Process implemented by the Company was consistent with the description of the Process set out in 1.4 Double Materiality Assessment.

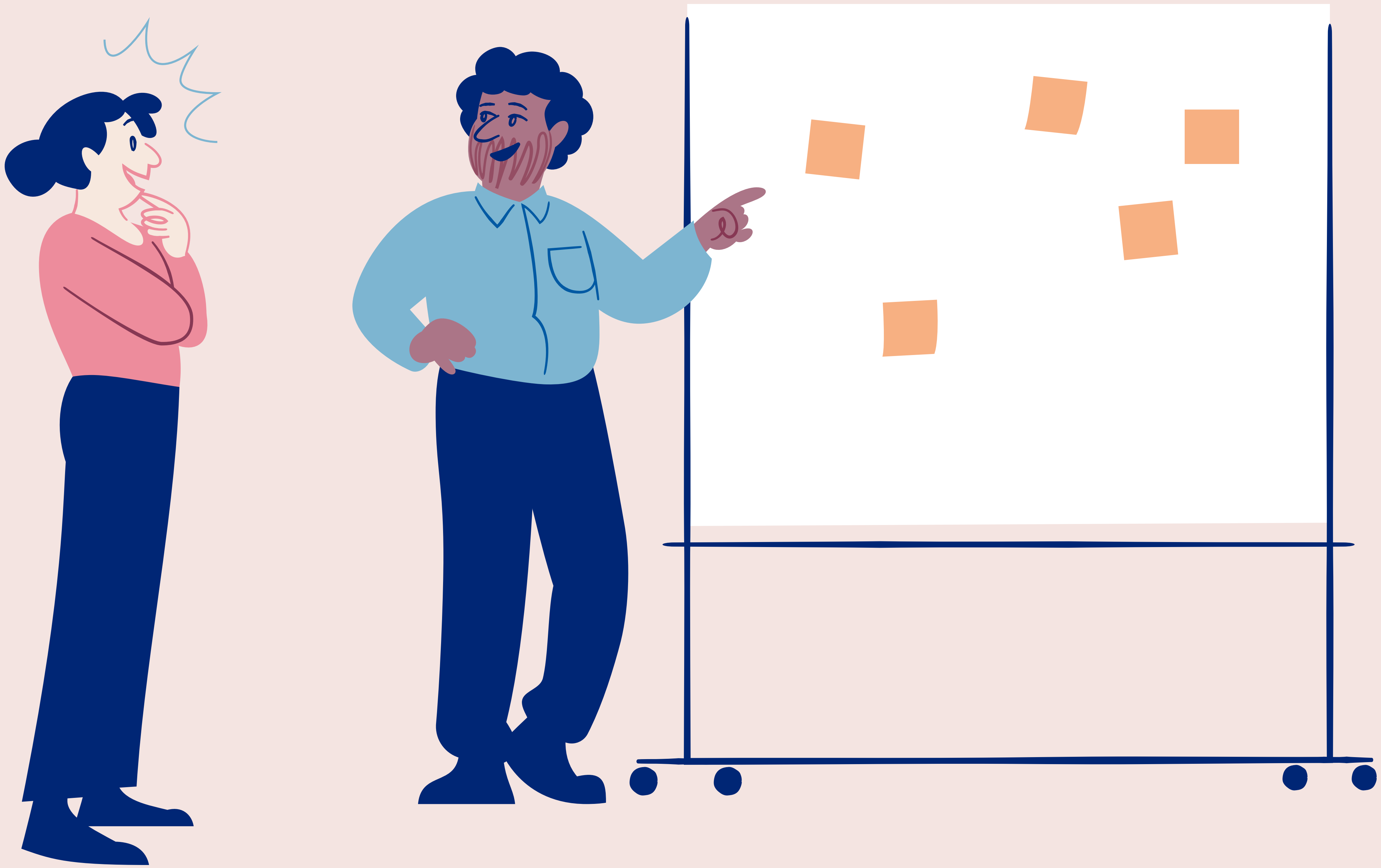
In conducting our limited assurance engagement, with respect to the Sustainability Statement, we:

- Obtained an understanding of the Group's reporting processes relevant to the preparation of its Sustainability Statement by:
  - Obtaining an understanding of the Group's control environment, processes and information system relevant to the preparation of the Sustainability Statement, but not for the purpose of providing a conclusion on the effectiveness of the Group's internal control; and
  - Obtaining an understanding of the Group's risk assessment process;
- Evaluated whether the information identified by the Process is included in the Sustainability Statement;
- Evaluated whether the structure and the presentation of the Sustainability Statement is in accordance with the ESRS;
- Performed inquiries of relevant personnel on selected information in the Sustainability Statement;

- Performed substantive assurance procedures on selected information in the Sustainability Statement;
- Where applicable, compared disclosures in the Sustainability Statement with the corresponding disclosures in the financial statements and other sections of the Board of Directors' report;
- Evaluated the methods, assumptions and data for developing estimates and forward-looking information;
- Obtained an understanding of the Company's process to identify taxonomy-eligible and taxonomy-aligned economic activities and the corresponding disclosures in the Sustainability Statement;
- Evaluated whether information about the identified taxonomy-eligible and taxonomy-aligned economic activities is included in the Sustainability Statement; and
- Performed inquiries of relevant personnel on selected taxonomy disclosures included in the Sustainability Statement.

Tromsø, 7 April 2025
KPMG AS

Stig-Tore Richardsen
State Authorised Public Accountant – Sustainability Auditor
Note: This translation from Norwegian has been prepared for information purposes only.



Annual Accounts 2024

ANNUAL REPORT – INCOME STATEMENT

PARENT BANK				GROUP	
2023	**2024**	AMOUNTS IN NOK MILLION	NOTES	**2024**	2023
6 214	**7 535**	Interest income	19	**7 887**	6 561
2 954	**3 882**	Interest costs	19	**3 859**	2 934
3 260	**3 653**	**Net interest income**		**4 028**	3 627
784	**868**	Fee- and commission income	20	**1 086**	962
67	**63**	Fee- and commission costs	20	**81**	90
234	**188**	Other operating income	20	**536**	532
951	**993**	**Net fee- commission and other operating income**		**1 541**	1 404
101	**81**	Dividend	21	**81**	101
610	**280**	Income from investments	21	**826**	–56
147	**149**	Gain/losses and net value changes from investments in securities	21	**149**	138
858	**510**	**Net income from investments**		**1 056**	183
5 069	**5 156**	**Total income**		**6 625**	5 214
619	**667**	Personnel costs	22, 23, 24	**1 103**	986
659	**724**	Other operating costs	23, 31, 32	**900**	839
1 278	**1 391**	**Total costs**		**2 003**	1 825
3 791	**3 765**	**Result before losses**		**4 622**	3 389
71	**85**	Losses	13	**110**	116
3 720	**3 680**	**Result before tax**		**4 512**	3 273
671	**781**	Tax	25	**849**	725
3 049	**2 899**	**Result for the year**		**3 663**	2 548
		Result for the year allocated:			
		Controlling owner's share		**3 630**	2 521
		Non-controlling owner's share		**33**	27
13,8	**12,9**	**Result per EC, adjusted for interests hybrid capital 1)**	41	**16,3**	11,4

Other comprehensive income					
3 049	**2 899**	**Resultat for the period**		**3 663**	2 548
		Items that will not be reclassified to profit/loss			
		Share of other comprehensive income from investment in joint-ventures	30	**–109**	–81
		Total		**–109**	–81
		Items that will be reclassified to profit/loss			
	10	Net change in fair value of financial assets available for sale		**10**	
		Share of other comprehensive income from investment in joint-ventures	30	**11**	
	-3	Tax on other comprehensive income		**-3**	–5
	7	**Total**		**18**	–5
3 049	**2 906**	**Total other comprehensive income for the period**		**3 572**	2 462

1) Result, adjusted for interests hybrid capital, multiplied by ECs' share of result, divided by number of ECs.

ANNUAL REPORT – BALANCE SHEET

PARENT BANK				GROUP	
31.12.23	**31.12.24**	AMOUNTS IN NOK MILLION	NOTES	**31.12.24**	31.12.23
		Assets			
402	**1 404**	Cash and balances with Central Banks		**1 404**	402
9 300	**10 070**	Loans and advances to credit institutions	10	**2 394**	2 304
89 086	**92 450**	Net loans and advances to customers	11, 13, 14	**101 828**	98 032
1 359	**1 522**	Shares	21, 29	**1 527**	1 364
18 187	**19 233**	Bonds and certificates	21, 28	**19 235**	18 189
1 422	**1 532**	Financial derivatives	16, 21	**1 532**	1 422
1 594	**1 752**	Investment in Group companies	30		
4 164	**4 684**	Investment in associated companies and joint ventures	30	**5 981**	4 858
402	**398**	Property, plant and equipment	31	**811**	811
		Intangible assets	33	**193**	193
504	**533**	Other assets	34	**768**	563
126 420	**133 578**	**Total assets**		**135 673**	128 138
		Liabilities			
1 165	**763**	Liabilities to credit institutions	10	**761**	1 164
82 560	**87 727**	Deposits from customers	35	**87 618**	82 495
13 970	**13 756**	Debt securities in issue	36	**13 756**	13 970
1 198	**1 086**	Financial derivatives	16	**1 086**	1 198
3 055	**3 171**	Other liabilities	24, 25, 37	**3 491**	3 703
	41	Deferred tax liabilities	25,	**187**	51
8 367	**9 435**	Subordinated loan capital and senior non-prefered debt	38	**9 435**	8 367
110 315	**115 979**	**Total liabilities**		**116 334**	110 948
		Equity			
2 650	**2 650**	Equity Certificate capital and premium reserve	41	**2 650**	2 650
1 250	**1 450**	Hybrid capital	42	**1 450**	1 250
4 238	**4 837**	Dividend Equalisation Fund	41	**5 516**	4 628
7 967	**8 662**	Saving Bank's Fund	41	**9 446**	8 417
		Non-controlling interests	41	**277**	245
16 105	**17 599**	**Total equity**		**19 339**	17 190
126 420	**133 578**	**Total liabilities and equity**		**135 673**	128 138

Tromsø, 20.02.24

The Board of Directors of SpareBank 1 Nord-Norge

This document is electronically signed, see confirmation after the auditor's report.

ANNUAL REPORT – CHANGES IN EQUITY

Parent Bank

AMOUNTS IN NOK MILLION	EC CAPITAL	PREMIUM FUND	HYBRID CAPITAL	DIVIDEND EQUALISA-TION FUND	SAVING BANK'S FUND	TOTAL EQUITY
Equity at 01.01.23	**1 807**	**843**	**600**	**3 676**	**7 317**	**14 243**
Total comprehensive i ncome for the period						
Period result				1 414	1 635	**3 049**
Other comprehensive income:						
Total comprehensive income for the period				1 414	1 635	**3 049**
Transactions with owners						
Dividend paid 2022/other distribution				–824	–952	**–1 776**
Interest hybrid capital				–28	–32	**–60**
Changes in hybrid capital, other equity trans-actions			650	1	–2	**649**
Total transactions with owners			650	–851	–986	**–1 187**
Equity at 31.12.23	**1 807**	**843**	**1 250**	**4 238**	**7 967**	**16 105**
Total comprehensive income for the period						
Period result				1 344	1 555	**2 899**
Other comprehensive income:						
Net change in fair value of financial assets available for sale				5	5	**10**
Tax on other comprehensive income				-1	-2	**-3**
Total comprehensive income for the period				1 348	1 558	**2 906**
Transactions with owners						
Dividend paid 2023/other distribution				–703	–813	**–1 516**
Interest hybrid capital				–46	–54	**–100**
Changes in hybrid capital, other equity trans-actions			200		4	**204**
Total transactions with owners			200	–749	–863	**-1 412**
Equity at 31.12.23	**1 807**	**843**	**1 450**	**4 837**	**8 662**	**17 599**

Group

AMOUNTS IN NOK MILLION	EC CAPITAL	PREMIUM FUND	HYBRID CAPITAL	DIVIDEND EQUALISATION FUND	SAVING BANK'S FUND	TOTAL CON-TROLLING INTERESTS	NON-CONTROLLING INTERESTS	TOTAL EQUITY
Equity at 01.01.23	**1 807**	**843**	**600**	**4 347**	**8 095**	**15 692**	**231**	**15 923**
Total comprehensive income for the period								
Period result				1 170	1 351	2 521	27	**2 548**
Other comprehensive income:								
Share of other comprehensive income from invest-ment in assosiated companies				–40	–46	–86		**–86**
Total comprehensive income for the period				1 130	1 305	2 435	27	**2 462**
Transactions with owners								
Changes in controlling interests							15	**15**
Dividend paid 2021/other distribution				–824	–952	–1 776	–27	**–1 803**
Interest hybrid capital				–28	–32	–60		**–60**
Changes in hybrid capital, other equity transactions			650	3	1	654	–1	**653**
Total transactions with owners			650	–849	–983	–1 182	–13	**–1 195**
Equity at 31.12.23	**1 807**	**843**	**1 250**	**4 628**	**8 417**	**16 945**	**245**	**17 190**
Total comprehensive income for the period								
Period result				1 683	1 947	3 630	33	**3 663**
Other comprehensive income:								
Net change in fair value of financial assets available for sale				5	5	10		**10**
Share of other comprehensive income from invest-ment in assosiated companies				-45	-53	-98		**–98**
Tax on other comprehensive income				-1	–2	-3		**–3**
Total comprehensive income for the period				1 641	1 898	3 539	33	**3 572**
Transactions with owners								
Changes in controlling interests							27	**27**
Dividend paid 2022/other distribution				–703	–813	–1 516	–27	**–1 543**
Interest hybrid capital				–46	–54	–100		**–100**
Changes in hybrid capital, other equity transactions			200	–4	–2	194	–1	**192**
Total transactions with owners			200	–753	–869	–1 422	–1	**–1 423**
Equity at 31.12.24	**1 807**	**843**	**1 450**	**5 516**	**9 446**	**19 062**	**277**	**19 339**

** The change in principle is described in note 2.*

ANNUAL REPORT – STATEMENT OF CASH FLOWS

PARENT BANK				PARENT BANK	
31.12.23	31.12.24	AMOUNTS IN NOK MILLION	NOTER	31.12.24	31.12.23
3 720	**3 680**	Profit before tax		**4 512**	3 273
60	**58**	+ Ordinary depreciation	31	**84**	88
71	**85**	+ Losses on loans and guarantees	13	**110**	116
671	**781**	- Tax/Result non-current assetes held for sale	25	**849**	725
3 180	**3 042**	**Provided from the year's operations**		**3 857**	2 752
1 213	**1 134**	Change in sundry liabilities: + increase/ - decrease	16, 24, 25, 37	**840**	1 314
115	**–211**	Change in various claims: - increase/ + decrease	16, 21, 34	**–315**	68
–5 257	**–4 439**	Change in gross lending to and claims on customers: - increase/ + decrease	11, 13, 14	**–4 238**	–5 452
36	**–1 209**	Change in short term-securities: - increase/ + decrease	21, 28, 29	**–1 209**	48
2 994	**5 167**	Change in deposits from and debt owed to customers: + increase/ - decrease	35	**5 123**	3 011
–21	**–402**	Change in liabilities to credit institusions: + increase/ - decrease	10	**–403**	–21
2 260	**3 082**	**A. Net liquidity change from operations**		**3 655**	1 720
–56	**–54**	- Investment in fixed assets	31	**–84**	–70
–767	**–676**	Payments to group companies and assosiated companies	30	**–532**	–767
98	**0**	Payments from/Change in values of group companies and assosiated companies	30	**–700**	701
–725	**–730**	**B. Liquidity change from investments**		**–1 316**	–136
–60	**–100**	Interest to hybrid capital owners	42	**–100**	–60
–43	**–47**	Payments to leases	32	**–56**	–55
–1 558	**–1 906**	- Dividend paid on EC/approved distributions	42	**–1 933**	–1 588
–4 667	**–4 374**	Payments to borrowings through the issuance of securities	36	**–4 374**	–4 667
2 448	**3 709**	Payments from borrowings through the issuance of securities	36	**3 709**	2 448
–350	**–311**	Payments to subordinated loan capital	38	**–311**	–350
2 643	**1 249**	Payments from subordinated loan capital	38	**1 249**	2 643
650	**200**	Payments to/payments from hybrid capital	42	**200**	650
		Payment from non-controlling interests		**27**	15
–937	**–1 580**	**C. Liquidity change from financing**		**–1 589**	–964
598	**772**	A + B + C. Total change in liquidity		**750**	620
631	**1 229**	**+ Liquid funds at the start of the period**		**1 251**	631
1 229	**2 001**	**= Liquid funds at the end of the period**		**2 001**	1 251

402	**1 404**	Cash and balances with Central Banks	Balanse	**1 404**	402
827	**597**	Loans and advances to credit institutions without an agreed term or notice period	Note 10	**597**	849
1 229	**2 001**	**Liquid funds at the end of the period**		**2 001**	1 251

		Additional information cash flow			
6 002	**7 519**	Interests received		**7 871**	6 349
2 776	**3 799**	Interests paid		**3 776**	2 756

Notes

Annual report – Notes

Note 1 General information

Description of the business

SpareBank 1 Nord-Norge is an independent Norwegian financial services group within the SpareBank 1-alliance with Equity Certificates registered on Oslo Stock Exchange.

We know Northern Norway and are a leading provider of comprehensive, modern financial solutions to customers with a basis in the Northern Norway market.

At the end of the year, the Group had 15 financial centres in Northern Norway.

Business address

The SpareBank 1 Nord-Norge Group's head office is located in Tromsø, and its business address is Storgata 65, 9008 Tromsø.

Date of adoption of the Group accounts

The 2024 final annual accounts were adopted by the Board of Directors on 05.03.25.

The 2024 final annual accounts were adopted by the Supervisory Board on 08.04.25.

Dividends will be paid out 16.04.25.
See note 43 for more information.

Auditor

The Group's auditor is state authorized public accountant Stig-Tore Richardsen at KPMG.

Note 2 Material accounting policies

1. Basis for preparation of the annual accounts
2. Changes in accounting principles
3. Presentation currency
4. Consolidation
5. Classification and valuation of financial assets and liabilities
6. Recognition, derecognition and measurement of financial assets and liabilities
7. Defaulted and doubtful commitments
8. Hybrid capital
9. Interest income and expenses
10. Commission income and expenses
11. Foreign currency transactions and holdings

Accounting policies related to loans and guarantees, as well as losses on loans and guarantees are discussed in Notes 10, 11, 12 and 13.

1. BASIS FOR PREPARATION OF THE ANNUAL ACCOUNTS

The consolidated and parent bank financial statements for 2024 of SpareBank 1 Nord-Norge have been prepared in accordance with IFRS® Accounting Standards as approved by the EU, which are mandatory for annual financial statements ending 31.12.24.

Unless otherwise specifically stated, the accounting principles are the same for the parent bank and the group. The financial statements are based on the historical cost principle, except for financial assets available for sale and financial assets and liabilities (including derivatives) measured at fair value through profit or loss.

The applied accounting principles are consistent with those applied in the previous accounting period, except for the changes in IFRS Accounting Standards that have been implemented by the group in the current accounting period.

The proposed annual financial statements were adopted by the board and the group CEO at the time indicated by the dated and signed balance sheet.

2. CHANGES IN ACCOUNTING POLICIES

Changes effective from the accounting year 01.1.24

The changes in IFRS and interpretations that have been adopted for 2024 have no material effect on the bank and the group's financial statements for 2024.

Within the group, EiendomsMegler 1 Nord-Norge previously practiced gross accounting of customer disbursements. This has been changed, and the company/group will net these items in 2024. Comparable group figures for 2023 have been changed in the income statement between certain lines in the income statement, but this has no overall net effect on the result.

Changing effects in 2023

NOK MILLION	GROSS	CHANGE	NET
Fee and commission income	1 045	–83	962
Personell costs	1 000	–14	986
Other operating costs	908	–69	839
Cost/income	36,0 %		35,0 %

The bank sells parts of the mortgage portfolio that qualify for transfer to SB1 Boligkreditt. Loans included in business models (portfolios) with loans that qualify for transfer are therefore held both to receive contractual cash flows and for sale. From the accounting year 2024, the bank classifies all mortgages at fair value through OCI. The fair value of mortgages at initial recognition is the transaction price, without reduction for 12-month expected loss. In previous years, only a selection of marked mortgages for sale to SB1 Boligkreditt was classified at fair value, and then at fair value through profit or loss.

3. PRESENTATION CURRENCY

The presentation currency is Norwegian kroner (NOK), which is also the Bank's functional currency. All amounts are presented in NOK millions (MNOK) unless otherwise stated.

4. CONSOLIDATION

The consolidated accounts comprise the Bank and all its subsidiaries. Subsidiaries are defined as companies in which the Bank has a controlling interest. Subsidiaries are consolidated from the date the Bank gains a controlling interest, and they will be eliminated from the consolidation on the date when such control is relinquished.

The subsidiaries' income statement and balance sheet are fully consolidated into respective lines in the Parent Bank's income statement and balance sheet. Intra-Group transactions, open accounts and unrealised profit between the Group's companies have been eliminated. The non-controlling ownership interests' share of the Group's profit is presented in a separate line under the profit after tax in the income statement. In equity, the non-controlling ownership interests' share is shown as a separate item.

On the balance sheet of the Parent Bank, ownership interests in subsidiaries, associated companies and joint ventures are recorded at cost. Only the annual dividends received from subsidiaries and the effect on the result of any write-down in the value of the shares are stated in the Parent Bank's income statement (cost method).

5. CLASSIFICATION AND VALUATION OF BALANCE SHEET ITEMS

The Group's balance sheet items are classified based on whether they are financial assets and liabilities or other items.

Financial assets

Pursuant to IFRS 9, financial assets must be classified into one of three measurement categories:

- Fair value with changes through profit or loss
- Fair value with changes through other comprehensive income (OCI)
- Amortised cost

For financial assets, there is a distinction between debt instruments, derivatives and equity instruments, where debt instruments are all financial assets that are not derivatives or equity instruments.

Financial assets that are debt instruments

Debt instruments with contractual cash flows that are only payments of interest and principal on given dates and that are held in a business model for the purpose of receiving contractual cash flows and sales must be measured at amortised cost. Most of the Group's lending is classified in this category.

Instruments with contractual cash flows that are only payments of interest and principal on given dates and that are held in a business model for the purpose of receiving contractual cash flows and sales must be measured at fair value with changes through profit or loss. The Group's mortgages that will be sold to Spare-

Note 2 Material accounting policies

Bank 1 Boligkreditt are included in this category. Instruments that generally must be measured at amortised cost or at fair value with changes through OCI can be designated to be measured at fair with changes through profit or loss if this eliminates or significantly reduces an "accounting mismatch". The Group's fixed-rate loans are included in this category because interest rate derivative contracts have been entered into that hedge fluctuations in the value of the fixed-rate loans related to changes in market interest rates.

Other debt instruments must be measured at fair value with changes through profit or loss. This applies to instruments with cash flows that are not only payments of normal interest and principal, and instruments that are held in a business model in which the main purpose is not the receipt of contractual cash flows. The Group's portfolio of certificates and bonds are included in this category.

Derivatives and investments in equity instruments

All derivatives in the Group must be measured at fair value with changes through profit or loss, however derivatives that are designated hedge instruments must be recognised in line with hedge accounting policies.

Investments in equity instruments must be recognised on the balance sheet at fair value. As a general rule, value changes must be recognised through ordinary profit or loss.

Financial liabilities

Under IFRS 9 no. 4.2, financial liabilities are classified at amortised cost.

The Group's debt and customer deposits are classified at amortised cost.

Hedging

The Group utilises derivatives for operational hedging purposes in order to minimise interest risk from fixed-rate instruments. The Bank assesses and documents the effectiveness of hedging, both at the time of initial classification and on an ongoing basis. In the event of a fair value hedge, the change in value of the hedged risk is recognised and changes from the opening balance are recognised in the income statement. The Bank does not utilise cash flow hedging.

The Group uses fair value hedging as a hedge accounting policy for deposits with fixed interest rates and fixed-rate securities debt.

Hedge accounting calculates the offsetting effects on the result associated with changes in the fair value of the hedging instrument and hedge object.

Other balance sheet asset and liability items

Investments in joint ventures and associated companies are booked using the equity method in the consolidated financial statements. All other asset and liability items on the balance sheet that are not financial are measured at cost.

Note 2 Material accounting policies

Classification of balance sheet items – as at December 2024

	CLASS	CURRENT IFRS/IAS	FINANCIAL ASSETS OR LIABILITIES	CLASSIFICATION 2024	BALANCE PARENT BANK 31.12.24	BALANCE GROUP 31.12.24
	Financial assets					
A	Cash	IFRS 9	Yes	AC	59	59
A	Deposits with central banks	IFRS 9	Yes	AC	1 345	1 345
B	Receivables from SNN Pensjonskasse	IFRS 9	Yes	FVPL	255	255
A	Lending to financial institutions	IFRS 9	Yes	AC	10 070	2 394
A	Write-downs lending to financial institutions	IFRS 9	Yes	AC	8 259	12 538
A	Property mortgages for retail customers	IFRS 9	Yes	AC	46 081	51 305
D	Property mortgages for retail customers prepared for sale to SpareBank 1 Boligkreditt (webclient)	IFRS 9	Yes	FVOCI	34 240	34 240
C	Fixed rate loans	IFRS 9, IFRS 13	Yes	FVO	4 571	4 571
A	Loan loss provisions	IFRS 9		AC	–701	–826
B	Shares, trading	IFRS 9, IFRS 13	Yes	FVPL	791	791
B	Shares, non trading	IFRS 9, IFRS 13	Yes	FVPL	7 118	7 118
B	Shares, non trading Hybrid Tier 1 Capital	IFRS 9, IFRS 13		FVPL	49	49
B	Liquidity portfolios	IFRS 9, IFRS 13	Yes	FVPL	19 233	19 235
B	Derivatives - interest rate-/currency hedging, bonds	IAS 39	Yes	FVPL	248	248
B	Derivatives - interest rate-/currency hedging, fixed rate loans	IAS 39	Yes	FVPL	135	135
B	Derivatives - interest rate-/currency hedging, customers	IAS 39	Yes	FVPL	699	699
B	Derivatives - interest rate-/currency hedging, funding	IAS 39	Yes	FVPL	421	421
B	Derivatives - commodity hedging	IAS 39	Yes	FVPL	29	29
	Total financial assets				132 902	134 156
	Financial liabilities					
A	Liabilities to financial institutions	IFRS 9	Yes	AC	763	761
A	Deposits from customers, variable rate	IFRS 9	Yes	AC	84 347	84 238
E	Deposits from customers, fixed rate	IFRS 9	Yes	FVH	3 380	3 380
A	Debt securities in issue, variable rate	IFRS 9	Yes	AC	8 258	8 258
E	Debt securities in issue, fixed rate	IFRS 9	Yes	FVH	5 498	5 498
A	Loss provisions, guarantees, credit limits, committed loans	IFRS 9	Yes	AC	34	34
B	Derivatives - interest rate-/currency hedging, bonds	IAS 39	Yes	FVPL	146	146
B	Derivatives - interest rate-/currency hedging, fixed rate loans	IAS 39	Yes	FVPL	2	2
B	Derivatives - interest rate-/currency hedging, customers	IAS 39	Yes	FVPL	578	578
B	Derivatives - interest rate-/currency hedging, funding	IAS 39	Yes	FVPL	335	335
B	Derivatives - commodity hedging	IAS 39	Yes	FVPL	26	26
A	Subordinated loan capital	IFRS 9	Yes	AC	9 435	9 435
	Total financial liabilities					
	Total financial liabilities				**112 801**	**112 690**
A	AC - Amortized Cost	Held for receiving contractual cash flows.				
B	FVPL - Mandatorily Fair Value Profit and Loss	Held for sale.				
C	FVO - Fair Value Option	Held for receiving contractual cash flows and for sale.				
D	FVOCI - Fair value througt other comprehensive insome	Held for receiving contractual cash flows and for sale.				
E	FVH - Fair value hedging	Held for receiving contractual cash flows and sales.				

Note 2 Material accounting policies

6. RECOGNITION, DERECOGNITION AND MEASUREMENT OF FINANCIAL ASSETS AND LIABILITIES

Fair value is the price that would have been obtained upon the sale of an asset, or paid for the transfer of a liability, in a well-ordered transaction between market players at the time of measurement.

A financial asset's or a financial liability's amortised cost is the amount that the financial asset or the financial liability is measured at upon initial recognition, minus repayments of the principal, plus or minus cumulative amortisation using an effective interest rate method of any difference between the initial amount and the amount due, and minus any reduction (direct or through the use of an appropriation account) for falls in value or exposure to loss.

An effective interest rate method is used to calculate amortised cost for a financial asset or a financial liability (or a group of financial assets or financial liabilities) and for allocating interest income or interest costs over a relevant period. The "effective interest rate" is the interest rate that exactly discounts estimated future cash receipts or payments over the financial instrument's expected lifetime, or over a shorter period if this is appropriate, to the net capitalised value of the financial assets or the financial liability. When calculating the effective interest rate, an institution must estimate cash flows and take into account all of the contractual terms and conditions associated with the financial instrument (e.g. early repayment, purchase options and similar options), but should not take account of future credit losses. The calculation includes all fees and points paid or received between parties to the contract that are an integral part of the effective interest rate, transaction costs and all other additional payments or discounts. It is assumed that the cash flows and expected lifetime of a group of similar financial instruments can be estimated reliably. However, in those rare cases where it is not possible to estimate the cash flows or expected life of a financial instrument (or a group of financial instruments) reliably, the institution must use the contractual cash flows throughout the period of maturity agreed for the financial instrument (or the group of financial instruments).

Derecognition is the elimination of a previously recognised financial asset or financial liability from an institution's balance sheet. Financial assets are derecognised upon expiration of the contractual rights to the cash flows from the financial asset or when the rights to the cash flows from the asset have been transferred in such a manner that the risk and return associated with ownership has to all intents and purposes been transferred.

Financial liabilities are derecognised when the contractual conditions have been met, been cancelled or expired.

The Bank has agreements concerning the sale of loans with very good collateral and property mortgages to SpareBank 1 Boligkreditt AS and SpareBank 1 Næringskreditt AS. According to the administration contracts concluded with these two alliance companies, the Bank administers the loans and remains responsible for customer contact. In addition to the sales sum, the Bank receives remuneration in the form of ongoing commissions for the loans. There is some residual involvement associated with sold loans with the possible, limited settlement of losses against commissions. The mortgage credit companies can sell on loans, but the Bank's right to administer the customers and receive commissions continues. If the Bank is unable to service customers, the right to service them and receive commissions may lapse. The Bank also has the option to buy back loans, subject to certain conditions. The Bank has assessed the accounting implications and concluded that the material risk and benefits of ownership of the sold loans has been transferred. This entails derecognition. Reference is made otherwise to Note 12.

When it repurchases its own bonds, the repurchased bonds are derecognised and the difference between the payment for and book value of the repurchased bond is recognised.

7. CONTINGENT LIABILITIES

The Group issues financial guarantees as part of its ordinary business. Latent liabilities are specified in Note 37. Loans are assessed for impairment as part of assessing loan losses and on the same basis, ref. Note 11. Provisions are made for other contingent liabilities if it is more probable than not that the liability will materialise and the financial consequences can be reliably calculated.

Note 2 Material accounting policies

8. HYBRID TIER 1 INSTRUMENTS

Hybrid tier 1 capital is a bond with a specified interest rate, but the issuer is under no obligation to pay interest for a period in which no dividend is paid, and an investor has no subsequent claim to the unpaid interest. The issuer is also not entitled to a refund of the principal. Hybrid Tier 1 instruments issued by the Bank are classified as equity on the balance sheet.

9. INTEREST INCOME AND EXPENSES

Interest income and expenses related to assets and liabilities which are valued at amortised cost are recognised in the income statement in accordance with the effective interest rate method. All fees related to interest-bearing loans and borrowings are included in the calculation of an effective interest rate and are amortised over the expected life of the financial instrument. For interest-bearing instruments carried at fair value, the contractual interest rate will be classified as interest income or interest expenses, whereas the effect of interest rate fluctuations is classified as income from other financial investments.

10. COMMISSION INCOME AND EXPENSES

Commission income and expenses are generally accrued in accordance with the delivery of a service. Fees related to interest-bearing instruments are not recognised as commissions; they are included in the calculation of the effective interest rate and recognised accordingly. Advisory fees are accrued in accordance with the concluded advice agreement, typically at the time the service is delivered. The same applies to day-to-day administrative services. Fees and charges related to the sale or brokerage of financial instruments, property or other investment objects that do not generate balance sheet items in the Bank's accounts, are recognised in the profit and loss account when the transaction is finalised.

11. FOREIGN CURRENCY TRANSACTIONS AND HOLDINGS

Transactions in foreign currencies are converted into Norwegian kroner using exchange rates prevailing at the time of the transaction. Gains and losses related to completed transactions or to the conversion of holdings of cash or cash equivalents at the balance sheet date are included in the profit and loss account, unless they are adjusted directly against equity in accordance with the principles of hedging.

Note 3 Critical estimates and assessments regarding the use of accounting principles

In preparing the consolidated financial statements the management makes estimates, discretionary judgements and assumptions that influence the application of the accounting policies. These could thus affect the stated amounts for assets, liabilities, income and costs.

Losses on loans and guarantees

SpareBank 1 Nord-Norge uses a model for calculating expected credit losses based on IFRS 9. Expected credit loss is calculated on a monthly basis based on an objective and probability-weighted analysis of alternative outcomes, where account is also taken of the time value of the expected cash flows. The analysis is based on relevant information available at the time of reporting and builds on three macroeconomic scenarios in order to take account of non-linear aspects of expected loss. The different scenarios are used to adjust relevant parameters for calculating expected loss and a probability-weighted average of expected credit loss according to the respective scenarios is recognised as a loss. Individual assessments of commitments subject to these are based on expected future cash flows.

For details, see note 13 – Losses.

Fair value of equity capital instruments

Financial assets assessed at fair value through the profit and loss account will normally be traded in active markets and the fair value can thus be determined with reasonable certainty.

With the exception of a few shares, the Norwegian stock market is considered to have poor liquidity. Share prices will in most circumstances be the last known transaction price. In some cases where the liquidity is poor and there is a great deal of unexplained fluctuations in the share price, the share price might be determined based on the weighted average over a specified time period, usually December.

In cases where there are no representative transactions, other valuation methods have been used in accordance with the valuation hierarchy in IFRS 9.

For details, see note 26 – Financial instruments at fair value.

Fair value of financial derivatives

The fair value of financial derivatives is usually determined by using valuation methods where the price of the underlying object, for example interest or foreign exchange rates, is obtained from the market. In the case of share options, volatility will either be observable implicit volatility or calculated volatility based on historical share price movements for the underlying object. If the bank's risk position is approximately neutral, middle rates will be used. A neutral risk position means for example that the interest rate risk within a repricing interval is approximately zero. In the opposite case, relevant purchase and sale prices will be used to assess the net position.

In the case of a counterparty whose credit rating is weaker than that of the Bank, the price will reflect an underlying credit risk. To the extent that market prices are obtained from transactions with a lower credit risk, this will be taken into account by amortising the original price difference measured against such transactions with a lower credit risk over the maturity period.

For details, see note 26 – Financial instruments at fair value.

Note 4 Business areas

Pursuant to IFRS 8, SpareBank 1 Nord-Norge has the following operating segments: retail market and corporate market. In addition, the subsidiary companies' activities, such as accounting services, real estate brokerage, and leasing/sale-leaseback financing are considered. The segments correspond with the executive management team's internal reporting structure. In SpareBank 1 Nord-Norge, the executive management team is responsible for evaluating and following up the segments' results and is defined as the chief operating decision maker in the sense used in IFRS 8.

The recognition and measurement principles in the Bank's segment reporting are based on accounting policies that comply with IFRS, as set out in the consolidated financial statements.

Any transactions between the segments are carried out at arm's length.
The item «unallocated» contains activities that cannot be allocated to the segments-

Group 31.12.24

AMOUNTS IN NOK MILLION	RETAIL MARKET	CORPORATE MARKET	SPARBANK 1 REGNSKAPSHUSET NORD-NORGE	EIENDOMSMEGLER 1 NORD-NORGE	SPAREBANK 1 FINANS NORD-NORGE	UNSPECIFIED	ELIMINATIONS	TOTAL
Net interest income	1 795	1 503	–1	1	372	358		**4 028**
Net fee- and other operation income	731	275	335	226	–3	–23		**1 541**
Net income from financial investments	2	–3			1	1 057		**1 056**
Total costs	607	398	326	195	88	389		**2 003**
Result before losses	1 921	1 377	8	32	282	1 003		**4 622**
Losses	18	66			26			**110**
Result before tax	1 903	1 311	8	32	256	1 003		**4 512**
Total lending	45 805	55 149			9 527	2 320	–7 752	**105 048**
Loss provision	–90	–610			–125			**–825**
Other assets			338	138		30 974		**31 450**
Total assets per business area	45 715	54 539	338	138	9 402	33 294	–7 752	**135 673**
Deposits from customers	47 276	39 825		27		564	–74	**87 618**
Other liabilities and equity capital	–1 561	14 714	338	111	9 402	17 225	7 826	**48 055**
Total equity and liabilities per business area	45 715	54 539	338	138	9 402	17 789	7 752	**135 673**

Note 4 Business areas

Group 31.12.23							
AMOUNTS IN NOK MILLION	RETAIL MARKET	CORPORATE MARKET	SPARBANK 1 REGNSKAPSHUSET NORD-NORGE	EIENDOMS-MEGLER 1 NORD-NORGE	SPAREBANK 1 FINANS NORD-NORGE	UNSPECIFIED / ELIMINA-TIONS	TOTAL
Net interest income	1 710	1 372	0	–1	365	181	**3 627**
Net fee- and other operation income	575	169	241	266	–27	263	**1 487**
Net income from financial investments	2	–3	0	0	1	183	**183**
Total costs	671	389	236	254	74	284	**1 908**
Result before losses	1 616	1 149	5	11	265	343	**3 389**
Losses	–11	81	0	0	46	0	**116**
Result before tax	1 627	1 068	5	11	219	343	**3 273**
Total lending	44 311	52 278	0	0	9 104	–4 600	**101 093**
Loss provision	–75	–550	0	0	–131	0	**–756**
Other assets	0	0	335	108	0	27 359	**27 802**
Total assets per business area	44 236	51 728	335	108	8 973	22 758	**128 138**
Deposits from customers	44 989	36 978	0	31	0	497	**82 495**
Other liabilities and equity capital	–753	14 750	335	77	8 973	22 261	**45 643**
Total equity and liabilities per business area	44 236	51 728	335	108	8 973	22 758	**128 138**

Note 5 Capital adequacy

Capital adequacy is calculated and reported in accordance with the EU's capital requirements regulations for banks and investment firms (CRR/CRD).

SpareBank 1 Nord-Norge uses IRB models (Internal Rating Based) for calculating capital requirements for credit risk. The bank uses the advanced IRB method for the corporate portfolio. The use of IRB imposes extensive requirements on the bank's organization, competence, risk models, and risk management systems.

Regulatory capital requirements

As of 31.12.24, the regulatory minimum requirement for the group's Common Equity Tier 1 (CET1) capital ratio is 14.8%. This includes the minimum requirement of 4.5%, the total buffer requirement of 9.5%, and the Pillar 2 requirement of 0.8%, equivalent to 56.25% of the Pillar 2 requirement of 1.4%. The actual buffer requirement is somewhat lower than 9.5%, as the systemic risk buffer and countercyclical capital buffer are calculated at differentiated rates.

Capital target

SpareBank 1 Nord-Norge's goal is to maintain indisputable financial strength and satisfy the regulatory minimum requirements for capital adequacy at all times. The Group has a target for its core Tier 1 capital ratio of 1.0 percentage point above the regulatory minimum requirement, which currently results in a target core Tier 1 capital ratio of 15.8 per cent.

Treatment of associated companies and joint ventures

The Group uses proportional consolidation for its capital adequacy reporting for the stakes in SpareBank 1 Boligkreditt, SpareBank 1 Næringskreditt, Kredittbanken ASA, BN Bank and SpareBank 1 Markets AS. In accordance with the decision of the Ministry of Finance, the stake in SpareBank 1 Betaling is deducted in its entirety from CET1 capital. The stake in SpareBank 1 Gruppen is treated as a significant investment in a financial sector entity, where the amount greater than 10 per cent of CET1 capital is deducted from the CET1 capital, pursuant to the applicable capital adequacy regulations.

Note 5 Capital adequacy

PARENT BANK			GROUP	
31.12.23	**31.12.24**	AMOUNTS IN NOK MILLION	**31.12.24**	31.12.23
1 807	**1 807**	Equity Certificate capital	**1 807**	1 807
843	**843**	Equity Certificate premium reserve	**843**	843
1 250	**1 450**	Hybrid capital	**1 450**	1 250
4 266	**4 837**	Dividend Equalisation Fund	**5 516**	4 266
7 999	**8 662**	The Savings Bank's Fund	**9 446**	7 999
		Donations		
–60		Other equtiy capital		780
		Minority interests	**277**	245
16 105	**17 599**	**Total book equity**	**19 339**	17 190
–1 250	**–1 450**	Hybrid capital	**–1 450**	–1 250
–1 516	**–1 895**	Allocated dividends	**–1 895**	–1 516
		Minority interests not eligible as CET1 capital	**–103**	–83
–6		Deduction for acquisition of own Equity Certificates		–6
		Goodwill and other intangible assets	**–1 024**	–213
–29	**–62**	Adjustments to CET 1 due to prudential filters	**–71**	–40
	–104	Deduction for expected losses IRB beyond accounting provisions	**–210**	–58
		Deduction for significant investments in financial sector entities	**–319**	–333
–276	**–276**	Deduction for non-significant investments in financial sector entities	**–213**	–225
13 028	**13 812**	**Common Equity Tier 1 Capital**	**14 054**	13 466
1 250	**1 450**	Hybrid Tier 1 bonds	**1 723**	1 429
–48	**–49**	Deduction for subordinated capital in other financial institutions with a significant investment	**–49**	–48
14 230	**15 213**	**Tier 1 Capital**	**15 728**	14 847
1 900	**1 950**	Subordinated loans eligible as T2 Capital	**2 328**	2 200
9		Expected losses on IRB, net of writedowns		
–223	**–227**	Deduction for subordinated capital in other financial institutions with a significant investment	**-227**	- 223
1 686	**1 723**	**Tier 2 Capital**	**2 101**	1 977
15 916	**16 936**	**Own Funds**	**17 829**	16 824
		Risk exposure amount		
6 250	**5 865**	Corporates – SME	**5 877**	6 258
16 052	**18 492**	Corporates – Specialised Lending	**19 476**	17 042
1 127	**866**	Corporates – Other	**909**	1 218
12 474	**13 019**	Retail – Secured by real estate	**22 910**	21 059
981	**1 108**	Retail – Other	**1 136**	1 001
8 229	**9 255**	Equity IRB		
45 113	**48 605**	**Credit risk IRB**	**50 308**	46 578

Note 5 Capital adequacy

Parent Bank			Group	
31.12.23	31.12.24	Amount in NOK million	31.12.24	31.12.23
		Central governments or central banks	205	15
222	253	Regional governments or local authorities	303	436
		Public sector entities	2	2
2 126	2 245	Institutions	1 265	1 247
3 270	2 989	Corporates	6 262	6 200
227	131	Retail	5 221	5 109
402	487	Secured by mortgages on immovable property	669	621
3	2	Exposures in default	260	364
1 077	1 083	Covered bonds	1 482	1 500
		Shares in securities funds	1	1
4 663	4 862	Equity	6 158	5 879
1 043	1 191	Other items	1 822	1 627
13 033	13 241	**Credit risk standardised approach**	23 650	23 001
58 146	61 846	**Total credit risk**	73 958	69 579
		Other risk weighted exposure amount	71	50
7 054	7 994	Operational risk	8 977	7 965
65	68	Credit Value Adjustment (CVA)	672	933
65 265	69 908	**Total risk exposure amount**	83 678	78 527
		Capital Requirements		
2 937	3 146	Minimum requirement Common Equity Tier 1 Capital (4.5%)	3 766	3 534
3 916	4 194	Minimum requirement Tier 1 Capital (6.0%)	5 021	4 712
5 221	5 593	Minimum requirement Own Funds (8.0%)	6 694	6 282
		Buffer Requirements		
2 937	3 146	Company specific system risk buffer (4.5%)	3 766	3 534
1 632	1 748	Countercyclical capital buffer (2.5%)	2 092	1 963
1 632	1 748	Conservation buffer (2.5%)	2 092	1 963
6 200	6 641	**Total buffer requirement (9.5%)**	7 949	7 460
516	551	Pilar II requirement (56.25% of requirement of 1.4%)	659	620
9 653	10 340	**Total regulatory requirement for Common Equity Tier 1 Capital (14.8%)**	12 376	11 614
3 375	3 472	**Available Common Equity Tier 1 Capital**	1 678	1 852
		Capital Adequacy Ratios		
20.0%	19.8%	Common Equity Tier 1 Capital Ratio	16.8%	17.1%
24.4%	24.2%	Total Capital Ratio	21.3%	21.4%
21.8%	21.8%	Tier 1 Capital	18.8%	18.9%
2.6%	2.4%	Tier 2 Capital	2.5%	2.5%
11.0%	11.1%	Leverage Ratio	7.8%	7.9%

Note 6 Financial risk management

1 RISK AND CAPITAL MANAGEMENT AT SPAREBANK 1 NORD-NORGE

SpareBank 1 Nord-Norge is exposed to various types of risk through its activities. Establishing good management and control of these risks is, therefore, essential.

For a more detailed description of the Group's risk management and internal control framework, please see the report *Statement on Corporate Governance* on our web site and the Group's Pillar 3 report.

2 MANAGEMENT AND CONTROL OF RISK AREAS

The following provides a more detailed description of the management and monitoring within the various areas of risk that have the largest effect on the accounts as of 31.12.24.

2.1 Credit risk

Definition

Credit risk is the risk of losses due to customers or counterparties being unable or unwilling to meet their financial obligations in accordance with an agreement.

Credit risk arises due to financing/lending in the retail and corporate markets. The Group is also exposed to credit risk from investments in interest-bearing securities. This is described in more detail under 2.3. "Market risk" below.

Management and control of credit risk

Credit risk is managed via the Group's frameworks for granting credit and portfolio management. These include risk limits, targets, industry-specific policy requirements, authority structures, credit models, continuous measurement, monitoring and reporting. The Group particularly focuses on concentration risk and the quality of the loan portfolio, which includes monitoring this both when credit is granted and during ongoing portfolio management. The established management and monitoring must support the Group's risk appetite in the area (moderate).

SpareBank 1 Nord-Norge has, in partnership with the SpareBank 1 alliance, developed its own credit models that are used for:

- Calculating capital requirements for credit risk (A-IRB)
- Granting credit
- Portfolio management
- Calculating expected credit loss (ECL)

The models are based on three main components:

1. **Probability of default (PD):** A risk parameter that indicates the likelihood of a customer defaulting on its financial obligations during a 12-month period. The probability of default is calculated based on historical data series for key financial and non-financial variables. In order to classify customers according to the probability of default, nine risk classes (A–I) are used. In addition, two risk classes (J and K) are used for customers with commitments in default and/or commitments that have been written down.
2. **Expected exposure at default (EAD):** Risk parameter that indicates the expected exposure to the customer in the event of any default.
3. **Loss given default (LGD):** Risk parameter that indicates the potential loss ratio if the customers defaults on its obligations. The assessment takes into consideration the realisation value of the mortgaged objects, and the costs incurred by the Group in connection with recovering commitments in default.

The credit models are verified (validated) and continuously being improved. Quantitative and qualitative validation processes are conducted every year. The quantitative validation process assesses the models' estimates and the extent to which the model assumptions are functioning as intended. The qualitative validation process assesses whether the IRB system is well-integrated throughout the organisation and whether it constitutes an important component of the Group's risk management and decision-making processes.

The credit risk in the Group is considered moderate, and in line with the Group's risk appetite. For further information, please see the related notes and the Group's Pillar 3 report.

Note 6 Financial risk management

2.2 Liquidity risk

Definition

Liquidity risk is the risk of the Group being unable to fulfil its obligations when they fall due, as well as the risk of the Group being unable to meet its liquidity obligations without the cost of this increasing significantly.

Liquidity risk arises as a result of and is primarily related to:

- Different periods of maturity and due dates for assets and liabilities
- Dependence on the capital market
- Regulatory requirements, as well as changes to these

Management and control of liquidity risk

Liquidity risk is managed using the Group's framework for this area. This includes risk limits, targets, continuous measurement, monitoring and reporting. The Group particularly focuses on predictability and stability in relation to liquidity and financing. The Group's liquidity risk policy takes account of various considerations, including trade-offs between both risk and business. The established management and monitoring must support the Group's risk appetite in the area (low).

Requirements for prudent liquidity management are regulated by, for example, regulatory and internal minimum requirements for the liquidity coverage ratio (LCR) and net stable funding ratio (NSFR). SpareBank 1 Nord-Norge's liquidity and funding have been adapted to satisfy these requirements.

The liquidity coverage ratio (LCR) is one of the liquidity area's most important management parameters. The regulatory minimum requirement for total LCR is 100 per cent. This means that the Group must at all times have a holding of liquid assets must be at least equal to the net liquidity outflow in a given stress period of 30 calendar days. As at 31.12.24, the Group's total LCR was 147 per cent (150 per cent)..

The net stable funding ratio (NSFR) key figure is used to assess the extent to which the Group has adequate long-term funding. NSFR is defined as available stable funding relative to required stable funding. The regulatory minimum requirement for total NSFR is 100 per cent. As at 31.12.24, the Group's total NSFR was 120 per cent (117 per cent).

Customer deposits represent the most important source of funding for the Group. The Group's deposit coverage ratio (excluding intermediary loans) was 85.4 per cent as at 31.12.24, compared with 83.5 per cent in 2023. Good deposit coverage and stable customer deposits are important for the Bank's liquidity management.

Other funding consists of borrowing in the form of covered bonds through SpareBank 1 Boligkreditt and SpareBank 1 Næringskreditt, subordinated loans and hybrid Tier 1 instruments. SpareBank 1 Nord-Norge has a conscious and active relationship with Norwegian and foreign actors in the capital markets (investor relations), including owners, potential investors, analysts and others with an interest in the Group. SpareBank 1 Nord-Norge strives to achieve a well-diversified funding structure within
given limits with respect to the market, product and due dates.

The Group has good capacity for funding in Norwegian kroner, but periodically reduced liquidity in the Norwegian market means that the Group finds being active in other markets for issuing securities reduces risk. The Bank has ratings from Moody's in order to secure good access to these capital markets. The Bank's long-term rating from Moody's is Aa3. The Bank also has a joint EMTN loan programme with SpareBank 1 Østlandet and SpareBank 1 SMN for borrowing in foreign currency.

In recent years, the Group has received annual MREL decisions from the Financial Supervisory Authority of Norway (Finanstilsynet) that determine the Bank's overall MREL needs as well as requirements for subordination. The Bank has therefore continuously adapted the funding to meet the regulatory MREL requirements. Up to 31.12.23, the Bank adapted to the final subordination requirement on a linear basis. From 01.01.24 onwards, the subordination requirement must be met in full. During 2024, the Bank has had sufficient buffers for the regulatory MREL requirements.

The liquidity risk in the Group is considered low, and in line with the Group's risk appetite. Please also see the more detailed description of liquidity risk in the notes to the annual accounts. For further information, please see the related notes and the Group's Pillar 3 report.

Note 6 Financial risk management

2.3 Market risk

Definition

Market risk is the risk of changes in the value of assets/financial positions due to changes in market value. Typical factors affecting market risk are interest rates, exchange rates, share prices, risk premiums, etc.

Market risks arise as a result of and are primarily related to:

- The management (including also holdings) of liquidity reserves.
- Changes in interest rates that affect both assets and liabilities.
- Changes in exchange rates that affect both assets and liabilities.
- Changes in shares prices that affect assets.
- Customer business within interest rate and currency trading.

Market risk consists of interest rate risk, credit spread risk, currency risk, equity risk, commodity risk and property risk.

Interest rate risk is the risk of changes in the value of positions in interest-bearing financial instruments (economic value of equity (EVE)) and changes in net interest income (NII) as a result of changes in interest rates.

The credit spread risk is defined as the risk of loss due to an expansion of credit spreads for interest-bearing securities in which the Group has invested. The Group is primarily exposed to credit spread risk through the administration of the liquidity portfolio, which consists of low-risk bonds and certificates. The potential loss associated with credit spread risk is calculated using methodology described in Finanstilsynet's circular 3/2022.

Currency risk is the risk of loss due to changes in exchange rates. The framework for exchange rate risk is expressed by limits for the total net currency position and maximum positions in individual currencies. The potential loss associated with currency risk is calculated using methodology described in Finanstilsynet's circular 3/2022.

Equity risk is the risk of loss due to changes in the value of equity positions in which the Group has invested. The potential loss associated with equity risk is calculated using methodology described in Finanstilsynet's circular 3/2022.

Property risk is the risk of loss due to falls in property prices for properties the Group has invested in (mainly related to banking operations). The potential loss associated with property risk is calculated using methodology described in Finanstilsynet's circular 3/2022.

Commodity risk is the risk of loss due to fluctuations in commodity prices. The potential loss associated with commodity risk is calculated as the open position in commodity derivatives. The exposure is not part of the Bank's core business, although it is offered as a product to customers who want such exposure, or the option of hedging.

Management and control of market risk

Market risks are managed using the Group's framework for this area. This includes risk limits, continuous measurement, monitoring and reporting. The established management and monitoring must support the Group's risk appetite in the area (low to moderate).

The Group takes a conservative approach to risk exposure in this area. This means the Group seldom takes positions in securities and financial instruments with a view to resale or benefiting from price or interest rate variations in the short term. The Group's general rule is that it should limit market risk through the active use of hedging instruments. Uncovered risks should only occur within specially allotted limits.

Stress tests for market risk show that the Bank and the Group have the capacity to keep the level of risk exposure within the adopted risk limits.

The market risk in the Group is considered low to moderate, and in line with the Group's risk appetite. For further information, please see the related notes and the Group's Pillar 3 report.

Note 6 Financial risk management

2.4 Ownership risk

Definition

Ownership risk is the risk of the Group suffering a loss from ownership interests in strategically owned companies, or the Group having to supply new capital to strategically owned companies. Ownership risks arise as a result of, and are related to, the Group's ownership of strategically important companies, for example SpareBank 1 Gruppen.

Management and control of ownership risk

Ownership risk is managed using the Group's framework for this area. This includes risk limits, targets, continuous measurement, monitoring and reporting. Ownership risk is also managed through active board participation in a number of part-owned companies. The established management and monitoring must support the Group's risk appetite in the area (moderate).

The stakes in wholly and partly owned companies are significant and important for the Group's overall profitability. On the other hand, these stakes can both lead to greater volatility in the results and affect capital adequacy. The stake in SpareBank 1 Gruppen represents the largest risk driver in this area.

SpareBank 1 Nord-Norge is primarily exposed to ownership risk through stakes in:

- SpareBank 1 Gruppen (19.5%)
- Kredittbanken ASA (SpareBank 1 Kreditt) (13.18%)
- Sparebank 1 Utvikling (18%)
- SpareBank 1 Betaling (17.94%)
- SpareBank 1 Boligkreditt (16.30%)
- SpareBank 1 Forvaltning (12.08%)
- SpareBank 1 Markets (18.06%)
- SpareBank 1 Næringskreditt (0.58%)

The potential loss associated with ownership risk is calculated using various approaches, some of which are based on methodology for ownership risk and equity risk described in Finanstilsynet's circular 3/2022.

The ownership risk is considered low to moderate, and in line with the Group's risk appetite. For further information, please see the related notes and the Group's Pillar 3 report.

2.5 ESG risk

Definition

ESG risk is the risk that arises due to climate, social and governance issues. ESG risks are both a specific risk type and an underlying risk driver for other risk types and arise due to the Group's core activities.

Management and control of ESG risk

ESG risk is managed using the Group's framework for this area. This is described in more detail in ESRS 2, chapter 1.4.2 – The Risk Management Process of IROs.

Established management and control should support the group's risk appetite in this area (low to moderate). For further information, refer to related ESRSs, the annual report, and the group's Pillar 3 report.

Note 7 Credit risk exposure for each internal risk rating

SpareBank 1 Nord-Norge use the company's own risk classification system for monitoring credit risk in the portfolio. The risk classification is based on probability of default for each individual commitment. In addition, the estimated value of collateralised assets pledged as security is used when placing customers into different groups according to risk. The allocation is done by connecting the collateral assets to the individual loans in question. Each customer is then divided into risk groups according to probability of default and security class, as shown below.

The table below presents average unsecured exposure in percentage of total commitments. Total commitments consist of gross loans, guarantees, unutilised credit and accrued interest. See also note 10 regarding total commitment.

Parent bank	AVERAGE UNSECURED EXPOSURE (%)		TOTAL AMOUNT	
AMOUNTS IN NOK MILLION	**2024**	2023	**2024**	2023
Very low risk	**0,00 %**	0,00 %	**41 533**	43 798
Low risk	**1,19 %**	0,94 %	**34 413**	33 106
Medium risk	**0,99 %**	1,07 %	**28 604**	24 517
High risk	**0,01 %**	0,00 %	**3 871**	3 342
Very high risk	**0,02 %**	0,03 %	**1 874**	1 951
In default and written down	**0,01 %**	0,02 %	**1 700**	850
Total	**2,22 %**	2,07 %	**111 995**	107 564

Group	AVERAGE UNSECURED EXPOSURE (%)		TOTAL AMOUNT	
AMOUNTS IN NOK MILLION	**2024**	2023	**2024**	2023
Very low risk	**0,00 %**	0,00 %	**35 876**	39 753
Low risk	**1,16 %**	0,92 %	**36 360**	34 861
Medium risk	**1,00 %**	1,06 %	**31 521**	26 651
High risk	**0,03 %**	0,02 %	**5 116**	4 474
Very high risk	**0,04 %**	0,06 %	**3 801**	3 541
In default and written down	**0,01 %**	0,02 %	**1 898**	967
Total	**2,24 %**	2,07 %	**114 572**	110 247

Note 8 Maximum credit risk exposure

The following table includes balance sheet items and items outside the balance sheet with credit risk, and the assessed value of the associated collateral. Where market values are available, these are used. Within real estate, models estimate the value of collateral based on market parameters for similar properties.

Parent bank 31.12.24

AMOUNTS IN NOK MILLION	TOTAL	COLLATERAL IN REAL ESTATE *)	OTHER COLLATERAL **)
Maximum on balance credit exposure			
Cash and balances with central banks	1 404		
Loans and advances to credit institutions	10 070		
Loans and advances to customers	93 151	69 516	14 812
Certificates and bonds	19 233		10 828
Financial derivatives	1 532		1 102
Maximum on balance credit exposure	**125 390**	**69 516**	**26 742**
Maximum off balance credit exposure			
Contingent liabilities	1 663	13	
Unutilised credits	6 164	1 634	
Loan approvals	7 089	1 130	
Maximum off balance credit exposure	**14 916**	**2 777**	
Maximum credit exposure	**140 306**	**72 293**	**26 742**

*) The collateral pledged for real estate commitments is assessed at market value, limited to the size of the commitment for the individual counterparty. This is done to express the effective value of the available collateral.

**) Other collateral includes, among other things, cash, movable property, ships, and received guarantees. For covered bonds, the cover pool consists of loans to customers of the company that issued the bond.

Group 31.12.24

AMOUNTS IN NOK MILLION	TOTAL	COLLATERAL IN REAL ESTATE *)	OTHER COLLATERAL **)
Maximum on balance credit exposure			
Cash and balances with central banks	1 404		
Loans and advances to credit institutions	2 394		
Loans and advances to customers	102 654	69 516	20 369
Certificates and bonds	19 233		10 828
Financial derivatives	1 532		1 102
Maximum on balance credit exposure	**127 217**	**69 516**	**32 299**
Maximum off balance credit exposure			
Contingent liabilities	1 648	13	
Unutilised credits	6 530	1 634	
Loan approvals	6 701	1 130	
Maximum off balance credit exposure	**14 879**	**2 777**	
Maximum credit exposure	**142 096**	**72 293**	**32 299**

*) The collateral pledged for real estate commitments is assessed at market value, limited to the size of the commitment for the individual counterparty. This is done to express the effective value of the available collateral

**) Other collateral includes, among other things, cash, movable property, ships, and received guarantees. For covered bonds, the cover pool consists of loans to customers of the company that issued the bond. In the Group, the adjusted realisation value of the lease objects is included in the subsidiary SpareBank 1 Finans Nord-Norge.

Note 8 Maxiumum credit risk exposure

Banking activities by geography 31.12.24 (balance)

AMOUNTS IN NOK MILLION	PARENT BANK	GROUP
Troms and Finnmark, including Svalbard	56 690	53 558
Nordland	30 876	34 633
Other regions in Norway	15 884	17 086
International	1 175	1 175
Total	**104 625**	**106 452**

Capital market activity by geography 31.12.24 (balance)

AMOUNTS IN NOK MILLION	PARENET BANK	GROUP
Norway	10 992	10 992
Europe	7 791	7 791
USA	1 417	1 417
Others	565	565
Total	**20 765**	**20 765**
Total credit exposure by geography	**125 390**	**127 217**

The following table stratifies credit exposures from mortgage loans and advances to retail customers by ranges of loan-to-value (LTV) ratio. LTV is calculated as the ratio of the gross amount of the loan - or the amount committed for loan commitments - to the value of the collateral. The valuation of the collateral excludes any adjustments for selling the collateral. The value of the collateral for residential mortgage loans is based on the collateral value at origination updated by change in housing price indicators. LTV on mortgage loans only applies to the parent bank.

LTV ratio (NOK million)

LTV INTERVALS	2024	2023
< 50 %	**9 218**	8 775
50–70 %	**14 398**	14 029
70–90 %	**19 274**	18 782
90–100 %	**1 402**	1 281
> 100 %	**1 617**	1 573
Total gross lending (retail market)	**45 909**	44 440

Note 8 Maxiumum credit risk exposure

Parent bank 31.12.23			
AMOUNTS IN NOK MILLION	TOTAL	COLLATERAL IN REAL ESTATE *)	OTHER COLLATERAL **)
Maximum on balance credit exposure			
Cash and balances with central banks	402		
Loans and advances to credit institutions	9 300		
Loans and advances to customers	89 712	66 242	13 088
Certificates and bonds	18 187		10 826
Financial derivatives	1 422		811
Maximum on balance credit exposure	**119 023**	**66 242**	**24 725**
Maximum off balance credit exposure			
Contingent liabilities	1 801	13	
Unutilised credits	6 751	1 594	
Loan approvals	5 036	872	
Maximum off balance credit exposure	**13 588**	**2 479**	
Maximum credit exposure	**132 611**	**68 721**	**24 725**

*) The collateral pledged for real estate commitments is assessed at market value, limited to the size of the commitment for the individual counterparty. This is done to express the effective value of the available collateral.

**) Other collateral includes, among other things, cash, movable property, ships, and received guarantees. For covered bonds, the cover pool consists of loans to customers of the company that issued the bond.

Group 31.12.23			
AMOUNTS IN NOK MILLION	TOTAL	COLLATERAL IN REAL ESTATE *)	OTHER COLLATERAL **)
Maximum on balance credit exposure			
Cash and balances with central banks	402		
Loans and advances to credit institutions	2 304		
Loans and advances to customers	98 789	66 242	18 161
Certificates and bonds	18 187		10 826
Financial derivatives	1 422		811
Maximum on balance credit exposure	**121 104**	**66 242**	**29 798**
Maximum off balance credit exposure			
Contingent liabilities	1 801	13	
Unutilised credits	6 992	1 594	
Loan approvals	5 037	872	
Maximum off balance credit exposure	**13 830**	**2 479**	
Maximum credit exposure	**134 934**	**68 721**	**29 798**

*) The collateral pledged for real estate commitments is assessed at market value, limited to the size of the commitment for the individual counterparty. This is done to express the effective value of the available collateral

**) Other collateral includes, among other things, cash, movable property, ships, and received guarantees. For covered bonds, the cover pool consists of loans to customers of the company that issued the bond. In the Group, the adjusted realisation value of the lease objects is included in the subsidiary SpareBank 1 Finans Nord-Norge.

Note 8 Maxiumum credit risk exposure

Banking activities by geography 31.12.23 (balance)		
AMOUNTS IN NOK MILLION	PARENT BANK	GROUP
Troms and Finnmark, including Svalbard	54 515	52 071
Nordland	30 672	34 003
Other regions in Norway	12 902	14 095
International	1 326	1 326
Total	**99 415**	**101 495**

Capital market activity by geography 31.12.23 (balance)		
AMOUNTS IN NOK MILLION	PARENET BANK	GROUP
Norway	11 352	11 352
Europe	6 684	6 684
USA	1 114	1 114
Others	459	459
Total	**19 609**	**19 609**
Total credit exposure by geography	**119 024**	**121 104**

Note 9 Credit quality by class of financial assets

SpareBank 1 Nord-Norge uses its own classification system for monitoring credit risk in the portfolio. The tables below show total gross lending and financial investments grouped by business area and risk category. Further information regarding risk management is found in note 6.

Parent bank 2024

AMOUNTS IN NOK MILLION	VERY LOW RISK	LOW RISK	MEDIUM RISK	HIGH RISK	VERY HIGH RISK	IN DEFAULT OR INDIVIDUALLY WRITTEN DOWN	TOTAL
Loans and advances to financial institutions	2 259	7 811					**10 070**
Loans and advances to customers							
Retail market	24 393	14 052	4 972	236	432	317	**44 402**
Corporate market	13 483	9 007	20 508	3 059	1 343	1 349	**48 749**
Total gross loans	40 135	30 870	25 480	3 295	1 775	1 666	**103 221**
Financial investments							
Listed government bonds	7 622						**7 622**
Listed other bonds	11 384						**11 384**
Unlisted other bonds			227				**227**
Total financial investments	19 006		227				**19 233**
Total	59 141	30 870	25 707	3 295	1 775	1 666	**122 454**
Share	48 %	25 %	21 %	3 %	1 %	1 %	**100 %**

Parent bank 2023

AMOUNTS IN NOK MILLION	VERY LOW RISK	LOW RISK	MEDIUM RISK	HIGH RISK	VERY HIGH RISK	IN DEFAULT OR INDIVIDUALLY WRITTEN DOWN	TOTAL
Loans and advances to financial institutions	2 304	6 996					**9 300**
Loans and advances to customers							
Retail market	24 029	14 772	4 861	282	279	215	**44 438**
Corporate market	10 716	9 997	19 269	3 018	1 655	620	**45 275**
Total gross loans	37 049	31 765	24 130	3 300	1 934	835	**99 013**
Financial investments							
Listed government bonds	6 653						**6 653**
Listed other bonds	11 311						**11 311**
Unlisted other bonds			223				**223**
Total financial investments	17 964		223				**18 187**
Total	55 013	31 765	24 353	3 300	1 934	835	**117 200**
Share	47 %	27 %	21 %	3 %	2 %	1 %	**100 %**

Note 9 Credit quality by class of financial assets

Group 2024

AMOUNTS IN NOK MILLION	VERY LOW RISK	LOW RISK	MEDIUM RISK	HIGH RISK	VERY HIGH RISK	IN DEFAULT OR INDIVIDUALLY WRITTEN DOWN	TOTAL
Loans and advances to financial institutions	2 259						**2 259**
Loans and advances to customers							
Retail market	25 860	16 831	6 063	417	574	365	**50 110**
Corporate market	12 160	17 362	14 700	3 942	3 016	1 499	**52 679**
Total gross loans	40 279	34 193	20 763	4 359	3 590	1 864	**105 048**
Financial investments							
Listed government bonds	7 622						**7 622**
Listed other bonds	11 384						**11 384**
Unlisted other bonds			227				**227**
Total financial investments	19 006		227				**19 233**
Total	59 285	34 193	20 990	4 359	3 590	1 864	**124 281**
Share	48 %	28 %	17 %	4 %	3 %	1 %	**100 %**

Group 2023

AMOUNTS IN NOK MILLION	VERY LOW RISK	LOW RISK	MEDIUM RISK	HIGH RISK	VERY HIGH RISK	IN DEFAULT OR INDIVIDUALLY WRITTEN DOWN	TOTAL
Loans and advances to financial institutions	2 304						**2 304**
Loans and advances to customers							
Retail market	24 031	14 773	4 862	282	279	215	**44 442**
Corporate market	19 610	10 205	19 236	3 019	1 657	620	**54 347**
Total gross loans	45 945	24 978	24 098	3 301	1 936	835	**101 093**
Financial investments							
Listed government bonds	6.653						**6 653**
Listed other bonds	11.311						**11 311**
Unlisted other bonds			223				**223**
Total financial investments	17 964		223				**18 187**
Total	63 909	24 978	24 321	3 301	1 936	835	**119 280**
Share	54 %	21 %	20 %	3 %	2 %	1 %	**100 %**

Note 10 Financial institutions - Loans and advances

Loans to financial institutions are measured at amortised cost. Amortised cost involves valuation based on the originally agreed cash flows, adjusted for expected loss.

PARENT BANK				AMOUNTS IN NOK MILLION	GROUP			
31.12.23	AVERAGE INTEREST RATE % *	31.12.24	AVERAGE INTEREST RATE % *		31.12.24	AVERAGE INTEREST RATE % *	31.12.23	AVERAGE INTEREST RATE % *
				Loans and advances to financial institutions				
827	2,90 %	**597**	**4,72 %**	Loans and advances without agreed maturity or notice of withdrawal	**597**	**4,72 %**	849	2,90 %
8 473	4,87 %	**9 473**	**4,51 %**	Loans and advances with agreed maturity or notice of withdrawal	**1 797**	**0,67 %**	1 455	4,87 %
9 300	4,70 %	**10 070**	**4,52 %**	**Total**	**2 394**	**0,95 %**	2 304	4,70 %
				Broken down by the most important foreign currencies				
8 748		**9 786**		NOK	**2 110**		1 752	
6		**3**		GBP	**3**		6	
142		**75**		EUR	**75**		142	
105		**35**		USD	**35**		105	
7		**2**		DKK	**2**		7	
292		**169**		Other foreign currencies	**169**		292	
9 300		**10 070**		**Total**	**2 394**		2 304	
				Deposits from credit institutions				
175	2,10 %	**308**	**6,32 %**	Loans and deposits from financial institutions without agreed maturity or notice of withdrawal	**308**	**6,32 %**	175	2,10 %
990	1,08 %	**455**	**1,37 %**	Loans and deposits from credit institutions with agreed maturity or notice of withdrawal	**453**	**1,37 %**	989	1,08 %
1 165	1,40 %	**763**	**2,37 %**	**Total**	**761**	**2,37 %**	1 164	1,40 %
				Broken down by the most important foreign currencies				
1 073		**567**		NOK	**565**		1 072	
				USD			0	
91		**195**		EUR	**195**		91	
1		**1**		Other foreign currencies	**1**		1	
1 165		**763**		**Total**	**761**		1 164	

* Average interest rate/(yield) is calculated as the sum of interest expense divided by average volume

				Collateral				
473		**459**		The balance sheet value of loans and advances to financial institutions pledged as collateral for derivatives trading	**459**		473	
669		**1 066**		The balance sheet value of loans and advances to financial institutions received as collateral for derivatives trading	**1 066**		669	

Note 11 Loans

Accounting principles lending to and receivables from customers Mortgages for sale to housing

Loans held in a “hold to collect contractual cash flows” business model are measured at amortized cost. Amortized cost is the acquisition cost minus principal repayments, plus or minus cumulative amortization resulting from an effective interest method. The effective interest rate is the rate that exactly discounts estimated future cash inflows or outflows over the expected life of the financial instrument. For loans at amortized cost, expected credit loss (ECL) calculations and loss provisions are made according to IFRS 9.

The bank sells parts of the mortgage portfolio that qualify for transfer to SB1 Boligkreditt. Loans included in business models (portfolios) with loans that qualify for transfer are therefore held both to collect contractual cash flows and for sale. The bank classifies all mortgages at fair value through OCI. The fair value of mortgages at initial recognition is the transaction price, without reduction for 12-month expected loss.

Fixed-rate loans to customers are accounted for at fair value through profit or loss. Gains and losses due to changes in fair value are recognized in the income statement as value changes. Accrued interest and premiums/discounts are recognized as interest. The interest rate risk in fixed-rate loans is managed with interest rate swaps, which are accounted for at fair value. The group believes that valuing fixed-rate loans at fair value provides more relevant information about the values in the balance sheet.

Loans broken down by method of measurement

PARENT BANK		AMOUNTS IN NOK MILLION	GROUP	
31.12.23	31.12.24		31.12.24	31.12.23
		Loans to credit institutions at amortised cost		
827	**597**	Loans without agreed maturity or notice of withdrawal	**597**	849
8 473	**9 473**	Loans with agreed maturity or notice of withdrawal	**1 797**	1 455
9 300	**10 070**	**Loans to credit institutions**	**2 394**	2 304
		Loans to customers at amortised cost		
82 399	**54 340**	Loans at amortised cost	**63 843**	91 476
82 399	**54 340**	**Loans to customers at amortised cost**	**63 843**	91 476
		Loans to customers at fair value through profit and loss		
4 268	**4 571**	Loans to customers at fixed interest rates	**4 571**	4 268
3 045	**34 240**	Mortgages to customers for sale, housing credit company	**34 240**	3 045
7 313	**38 811**	**Loans at fair value through profit and loss**	**38 811**	7 313
89 712	**93 151**	**Total gross loans to customers**	**102 654**	98 789
99 013	**103 221**	**Total gross loans**	**105 048**	101 093
		Provision for credit losses - reduction in assets		
–134	**–100**	Provision for credit losses - stage 1	**–114**	–152
–302	**–289**	Provision for credit losses - stage 2	**–335**	–343
–190	**–312**	Provision for credit losses - stage 3	**–377**	–261
89 086	**92 450**	**Net loans to customers ex. loans transfered to SB1 BK and SB1 NK**	**101 828**	98 032

Note 11 Loans

Additional information

Parent bank		Amounts in NOK million	Group	
31.12.23	**31.12.24**		**31.12.24**	31.12.23
		Financial leasing 1)	**4 093**	4 042
5 393	**5 046**	Overdraft- and working capital facilities	**5 355**	5 830
2 402	**2 064**	Building loans	**2 064**	2 402
81 918	**86 041**	Repayment loans	**91 142**	86 515
9 300	**10 070**	Loans to credit institutions	**2 394**	2 304
99 013	**103 221**	**Total gross loans**	**105 048**	101 093
		Of which, subordinated loan capital accounted for:		
1 533	**393**	Subordinated loan capital in financial institutions	**227**	1 367
1 351	**1 417**	Loans to employees	**1 417**	1 351

1) Loans and advances to customers relating to financial leasing	**31.12.24**	31.12.23
Maturities of less than 1 year	**95**	130
Maturities of more than 1 year but not more than 5 years	**1 836**	1 876
Maturities of more than 5 years	**2 531**	2 340
Total	**4 462**	4 346
Income received, not yet earned, relating to financial leasing	**–370**	–304
Net investments relating to financial leasing	**4 093**	4 042
Net investments in financial leasing may be analysed in the following way:		
Maturities of less than 1 year	**79**	122
Maturities of more than 1 year but not more than 5 years	**1 531**	1 756
Maturities of more than 5 years	**2 112**	2 051
Total	**3 722**	3 929

Loans broken down by sector/industry

Total commitment is defined as the sum of net lending, guarantee exposure, unused credit and accrued interest. Expected losses are calculated in stages 1, 2 and 3 only for financial assets at amortised cost. The bank has both gross lending and financial liabilities measured at amortised cost, where expected losses are calculated according to IFRS 9. See note 13 for further details.

Note 11 Loans

Parent bank 31.12.24

Loans broken down by sector/industry Amounts in NOK million	Total comimments to amortised cost	Lending at fair value	Lending provision Stage 1	Stage 2	Stage 3	Net loans
Agriculture, forestry and fishing	11 790	315	–9	–69	–50	11 977
Mining and quarrying	16	3				19
Manufacturing	1 853	38	–4	–24	–32	1 832
Electricity, gas, steam and air conditioning supply	2 125		–6			2 119
Water supply, sewerage, waste managment and remediation activities	153	3				156
Construction	2 307	131	–5	–24	–36	2 372
Wholesale and retail trade, repair of motor vehicles and motorcycles	1 368	66	–2	–8	–2	1 421
Transporting and storage	3 255	119	–8	–8	–6	3 353
Accommodation and food service activities	726	28	–2	–10	–2	741
Information and communication	41	22			–2	60
Financial and insurance activities	12 048	1	–7	–10		12 033
Real estate activities	17 816	36	–44	–96	–131	17 583
Professional, scientific and technical activities	833	79	–5	–5		952
Administrative and support service activities		64	–2	–3	–1	549
Public administration and defence; compulsory social security	428					428
Education	59	50			–1	107
Human health and social work activities	141	108			–1	248
Arts, entertainment and recreation	262	62	–1	–3	–3	318
Other services activities	381	33	–1			414
Activities of households as employers; undifferentiated goods - and services - producing activities of households for own use	8					8
Activities of extraterritorial organisations and bodies						
Corporate market	**56 151**	**1 160**	**–97**	**–259**	**–266**	**56 690**
Retail market	**8 259**	**37 650**	**–3**	**–30**	**–46**	**45 830**
Total loans	**64 410**	**38 811**	**–100**	**–289**	**–312**	**102 520**

Note 11 Loans

Parent bank 31.12.24					
FINANCIAL COMMITMENTS BROKEN DOWN BY SECTOR/INDUSTRY AMOUNTS IN NOK MILLION	FINANCIAL COMMITMENTS TO AMORTISED COST	LEDNING PROVISION CLASSIFIED AS DEBT			
		STAGE 1	STAGE 2	STAGE 3	**TOTAL**
Agriculture, forestry and fishing	1 462		–3		**–4**
Mining and quarrying	5				
Manufacturing	564	–1	–1	–2	**–4**
Electricity, gas, steam and air conditioning supply	474	–1			**–1**
Water supply, sewerage, waste managment and remediation activities	18				
Construction	505	–1	–3		**–4**
Wholesale and retail trade, repair of motor vehicles and motorcycles	584	–1	–1		**–3**
Transporting and storage	1 514	–4	–3		**–6**
Accommodation and food service activities	60				
Information and communication	30				
Financial and insurance activities	211				
Real estate activities	507	–3	–4		**–6**
Professional, scientific and technical activi-ties	71		–1		**–1**
Administrative and support service activities	67				
Public administration and defence; compul-sory social security	886				
Education	8				
Human health and social work activities	35				
Arts, entertainment and recreation	21				
Other services activities	118				
Activities of households as employers; undif-ferentiated goods - and services - producing activities of households for own use					**–1**
Activities of extraterritorial organisations and bodies					
Corporate market	**7 142**	**–13**	**–17**	**–2**	**–32**
Retail market	**1 632**				
Total loans	**8 774**	**–13**	**–17**	**–2**	**–32**

Note 11 Loans

Group 31.12.24						
LOANS BROKEN DOWN BY SECTOR/ INDUSTRY AMOUNTS IN NOK MILLION	TOTAL COMMIMENTS TO AMORTISED COST	LENDING AT FAIR VALUE	LENDING PROVISION			
			STAGE 1	STAGE 2	STAGE 3	NET LOANS
Agriculture, forestry and fishing	12 950	315	–11	–74	–52	13 129
Mining and quarrying	52	3				55
Manufacturing	2 335	38	–5	–34	–35	2 299
Electricity, gas, steam and air conditioning supply	2 160		–6			2 154
Water supply, sewerage, waste managment and remediation activities	337	3				339
Construction	3 049	131	–5	–26	–46	3 103
Wholesale and retail trade, repair of motor vehicles and motorcycles	1 921	66	–4	–23	–3	1 956
Transporting and storage	4 338	119	–9	–11	–8	4 429
Accommodation and food service activities	800	28	–2	–10	–2	814
Information and communication	48	22			–2	68
Financial and insurance activities	4 350	1	–7	–10		4 334
Real estate activities	17 919	36	–42	–96	–131	17 685
Professional, scientific and technical activi-ties	985	79	–5	–5		1 053
Administrative and support service activities	1 055	64	–3	–4	–3	1 110
Public administration and defence; compul-sory social security	450					450
Education	77	50			–1	125
Human health and social work activities	156	108	–1		–1	263
Arts, entertainment and recreation	317	62	–1	–3	–3	373
Other services activities	393	33	–1			426
Activities of households as employers; undif-ferentiated goods - and services - producing activities of households for own use	8					8
Activities of extraterritorial organisations and bodies						
Corporate market	**53 701**	**1 160**	**–103**	**–297**	**–288**	**54 172**
Retail market	**12 537**	**37 650**	**–11**	**–37**	**–89**	**50 049**
Total loans	**66 238**	**38 811**	**–114**	**–335**	**–377**	**104 222**

Note 11 LOANS

Group 31.12.24					
FINANCIAL COMMITMENTS BROKEN DOWN BY SECTOR/INDUSTRY AMOUNTS IN NOK MILLION	FINANCIAL COMMITMENTS TO AMORTISED COST	LEDNING PROVISION CLASSIFIED AS DEBT			
		STAGE 1	STAGE 2	STAGE 3	**TOTAL**
Agriculture, forestry and fishing	1 497		–3		**–4**
Mining and quarrying	5				
Manufacturing	568	–1	–1	–2	**–4**
Electricity, gas, steam and air conditioning supply	474	–1			**–1**
Water supply, sewerage, waste managment and remediation activities	30				
Construction	593	–1	–3		**–4**
Wholesale and retail trade, repair of motor vehicles and motorcycles	809	–1	–1		**–3**
Transporting and storage	1 605	–4	–3		**–6**
Accommodation and food service activities	60				
Information and communication	30				
Financial and insurance activities	211				
Real estate activities	507	–3	–4		**–6**
Professional, scientific and technical activities	74		–1		**–1**
Administrative and support service activities	361				
Public administration and defence; compulsory social security	886				
Education	8				
Human health and social work activities	35				
Arts, entertainment and recreation	21				
Other services activities	118				
Activities of households as employers; undifferentiated goods - and services - producing activities of households for own use					**–1**
Activities of extraterritorial organisations and bodies					
Corporate market	**7 891**	**–13**	**–17**	**–2**	**–32**
Retail market	**1 632**				
Total loans	**9 524**	**–13**	**–17**	**–2**	**–32**

Note 11 LOANS

Parent bank 31.12.23						
			LENDING PROVISION			
LOANS BROKEN DOWN BY SECTOR/INDUSTRY AMOUNTS IN NOK MILLION	TOTAL COMMIMENTS TO AMORTISED COST	LENDING AT FAIR VALUE	STAGE 1	STAGE 2	STAGE 3	NET LOANS
Agriculture, forestry and fishing	11 149	64	–17	–84	–11	11 100
Mining and quarrying	5	3				8
Manufacturing	1 606	7	–3	–10	–16	1 584
Electricity, gas, steam and air conditioning supply	2 058		–9	–1		2 047
Water supply, sewerage, waste managment and remediation activities	113					113
Construction	2 228	32	–6	–26	–18	2 210
Wholesale and retail trade, repair of motor vehicles and motorcycles	1 493	23	–3	–7	–2	1 504
Transporting and storage	2 394	28	–6	–9	–6	2 402
Accommodation and food service activities	609	3	–2	–3	–4	603
Information and communication	106	5		–1	–2	108
Financial and insurance activities	12 127		–20	–5	–6	12 096
Real estate activities	16 869	35	–44	–121	–85	16 656
Professional, scientific and technical activities	1 619	8	–6	–7		1 613
Administrative and support service activities	627	4	–6	–4		621
Public administration and defence; compulsory social security	380					379
Education	70	4			–1	72
Human health and social work activities	200	18	–1		–1	216
Arts, entertainment and recreation	406	8	–1	–1	–3	410
Other services activities	246	18	–1			263
Activities of households as employers; undifferentiated goods - and services - producing activities of households for own use	12					12
Activities of extraterritorial organisations and bodies						
Corporate market	**54 314**	**260**	**–125**	**–279**	**–154**	**54 016**
Retail market	**37 385**	**7 053**	**–10**	**–23**	**–35**	**44 370**
Total loans	**91 699**	**7 313**	**–135**	**–302**	**–189**	**98 387**

Note 11 Loans

Parent Bank 31.12.23					
FINANCIAL COMMITMENTS BROKEN DOWN BY SECTOR/INDUSTRY AMOUNTS IN NOK MILLION	FINANCIAL COMMITMENTS TO AMORTISED COST	LEDNING PROVISION CLASSIFIED AS DEBT			
		STAGE 1	STAGE 2	STAGE 3	**TOTAL**
Agriculture, forestry and fishing	1 544	–1	–1		**–2**
Mining and quarrying	3				
Manufacturing	263		–1	–3	**–4**
Electricity, gas, steam and air conditioning supply	345	–1			**–1**
Water supply, sewerage, waste managment and remediation activities	11				
Construction	586	–1	–9	–2	**–11**
Wholesale and retail trade, repair of motor vehicles and motorcycles	434		–1		**–1**
Transporting and storage	1 038	–3			**–4**
Accommodation and food service activities	66				
Information and communication	24				
Financial and insurance activities	462	–1	–3	–5	**–9**
Real estate activities	950	–5	–19		**–24**
Professional, scientific and technical activities	417	–1			**–1**
Administrative and support service activities	69				
Public administration and defence; compulsory social security	611				
Education	6				
Human health and social work activities	31				
Arts, entertainment and recreation	26				
Other services activities	33				
Activities of households as employers; undifferentiated goods - and services - producing activities of households for own use			–1		**–1**
Activities of extraterritorial organisations and bodies					
Corporate market	**6 919**	**–14**	**–36**	**–10**	**–60**
Retail market	**1 633**				
Total loans	**8 552**	**–14**	**–36**	**–10**	**–61**

Note 11 Loans

Group 31.12.23						
LOANS BROKEN DOWN BY SECTOR/ INDUSTRY AMOUNTS IN NOK MILLION	TOTAL COMMIMENTS TO AMORTISED COST	LENDING AT FAIR VALUE	LENDING PROVISION			
			STAGE 1	STAGE 2	STAGE 3	NET LOANS
Agriculture, forestry and fishing	12 275	64	–20	–92	–12	12 215
Mining and quarrying	56	3				59
Manufacturing	2 142	7	–4	–24	–17	2 105
Electricity, gas, steam and air conditioning supply	2 096		–9	–1		2 085
Water supply, sewerage, waste managment and remediation activities	255					254
Construction	2 961	32	–7	–28	–24	2 935
Wholesale and retail trade, repair of motor vehicles and motorcycles	2 044	23	–6	–10	–2	2 049
Transporting and storage	3 305	28	–9	–11	–7	3 306
Accommodation and food service activities	681	3	–2	–2	–4	675
Information and communication	115	5		–1	–2	117
Financial and insurance activities	5 085		–20	–5	–6	5 054
Real estate activities	16 957	35	–43	–121	–85	16 743
Professional, scientific and technical activities	1 749	8	–6	–7		1 742
Administrative and support service activities	1 340	4	–7	–8	–50	1 280
Public administration and defence; compulsory social security	399					399
Education	86	4			–1	89
Human health and social work activities	242	18	–1		–1	258
Arts, entertainment and recreation	460	8	–1	–1	–2	463
Other services activities	261	18	–1			279
Activities of households as employers; undifferentiated goods - and services - producing activities of households for own use	12					12
Activities of extraterritorial organisations and bodies						
Corporate market	**52 523**	**260**	**–138**	**–314**	**–213**	**52 117**
Retail market	**41 256**	**7 053**	**–15**	**–29**	**–47**	**48 219**
Total loans	**93 780**	**7 313**	**–152**	**–343**	**–261**	**100 337**

Note 11 Loans

Group 31.12.23					
FINANCIAL COMMITMENTS BROKEN DOWN BY SECTOR/INDUSTRY AMOUNTS IN NOK MILLION	FINANCIAL COMMITMENTS TO AMORTISED COST	LEDNING PROVISION CLASSIFIED AS DEBT			
		STAGE 1	STAGE 2	STAGE 3	**TOTAL**
Agriculture, forestry and fishing	1 577	–1	–1		**–2**
Mining and quarrying	3				
Manufacturing	279		–1	–3	**–4**
Electricity, gas, steam and air conditioning supply	345	–1			**–1**
Water supply, sewerage, waste managment and remediation activities	24				
Construction	634	–1	–9	–2	**–11**
Wholesale and retail trade, repair of motor vehicles and motorcycles	596		–1		**–1**
Transporting and storage	1 233	–6			**–4**
Accommodation and food service activities	66				
Information and communication	24				
Financial and insurance activities	462	–1	–3	–5	**–9**
Real estate activities	950	–5	–19		**–24**
Professional, scientific and technical activities	417	–1			**–1**
Administrative and support service activities	202				
Public administration and defence; compulsory social security	611				
Education	6				
Human health and social work activities	31				
Arts, entertainment and recreation	26				
Other services activities	33				
Activities of households as employers; undifferentiated goods - and services - producing activities of households for own use			–1		**–1**
Activities of extraterritorial organisations and bodies					
Corporate market	**7 521**	**–14**	**–36**	**–10**	**–60**
Retail market	**1 633**				
Total loans	**9 153**	**–14**	**–36**	**–10**	**–61**

Note 11 Loans

The tables below present total commitments by risk categories and Stages in the ECL assessment.
The total loan commitment is defined as the sum of loan balances, guarantee limits, credit limits, and accrued interest as of 31.12.24. Expected losses are calculated only in stages 1, 2, and 3 for financial assets at amortized cost. The bank has both gross loans and financial liabilities measured at amortized cost, where expected losses are calculated according to IFRS 9.

See note 13 for more information on provisions for expected losses.

Parent bank 31.12.24				
TOTAL LOAN COMMITMENTS BROKEN DOWN BY STAGE OF THE CREDIT RISK ASSESSMENT	STAGE 1	STAGE 2	STAGE 3	**TOTAL**
Total loan commitments to amortised cost 01.01.24	94 871	11 954	740	**107 565**
Changes in the period due to loans migrated between the stages				
to (-from) stage 1	2 827	–2 819	–8	
to (-from) stage 2	–4 911	4 963	–52	
to (-from) stage 3	–169	–760	929	
Net increase/(decrease) balance existing loans	–5 267	–756	–84	**–6 106**
Originated or purchased during the period	29 034	3 404	343	**32 780**
Loans that have been derecognised	–21 859	–2 302	–271	**–24 433**
Changes caused by modifications which hasn't resultet in a deduction	1 995	180	14	**2 189**
Total loan commitments to amortised cost	96 522	13 864	1 610	**111 996**
Off-balance sheet	–6 999	–1 743	–32	**–8 774**
Gross loans	89 523	12 121	1 578	**103 221**
Provision for credit losses - reduction in assets	–100	–289	–312	**–701**
Net loans	89 424	11 832	1 264	**102 520**

Note 11 Loans

Group 31.12.24				
TOTAL LOAN COMMITMENTS BROKEN DOWN BY STAGE OF THE CREDIT RISK ASSESSMENT	STAGE 1	STAGE 2	STAGE 3	TOTAL
Total loan commitments to amortised cost 01.01.24	95 434	13 955	858	**110 247**
Changes in the period due to loans migrated between the stages				
to (-from) stage 1	3 283	–3 272	–11	
to (-from) stage 2	–5 473	5 533	–61	
to (-from) stage 3	–207	–813	1 019	
Net increase/(decrease) balance existing loans	–6 182	–957	–130	**–7 269**
Originated or purchased during the period	32 122	3 868	385	**36 375**
Loans that have been derecognised	–24 022	–2 621	–307	**–26 951**
Changes caused by modifications which hasn't resultet in a deduction	2 042	114	14	**2 169**
Total loan commitments to amortised cost	96 998	15 807	1 767	**114 572**
Off-balance sheet	–7 506	–1 856	–151	**–9 524**
Gross loans	89 492	13 941	1 616	**105 048**
Provision for credit losses - reduction in assets	–114	–335	–377	**–826**
Net loans	**89 377**	**13 607**	**1 238**	**104 222**

Note 11 Loans

Parent bank 31.12.23				
TOTAL LOAN COMMITMENTS BROKEN DOWN BY STAGE OF THE CREDIT RISK ASSESSMENT AMOUNTS IN NOK MILLION	STAGE 1	STAGE 2	STAGE 3	TOTAL
Total loan commitments to amortised cost 01.01.23	85 168	6 485	517	**92 170**
Changes in the period due to loans migrated between the stages				
to (-from) stage 1	1 966	–1 955	–11	**0**
to (-from) stage 2	–6 245	6 268	–23	**0**
to (-from) stage 3	–154	–198	352	**0**
Net increase/(decrease) balance existing loans	–2 800	–599	–54	**–3 453**
Originated or purchased during the period	27 330	4 170	163	**31 663**
Loans that have been derecognised	–17 708	–2 217	–204	**–20 129**
Total loan commitments to amortised cost	87 557	11 954	740	**100 251**
Loans at fair value through profit and loss				**7 313**
Total loan commitments as at 31.12.23	87 557	11 954	740	**107 564**
Off-balance sheet	–7 293	–1 228	–30	**–8 551**
Gross loans	80 264	10 726	710	**99 013**
Provision for credit losses - reduction in assets	–134	–302	–190	**–626**
Net loans	80 130	10 424	520	**98 387**

Note 11 Loans

Group 31.12.23				
TOTAL LOAN COMMITMENTS BROKEN DOWN BY STAGE OF THE CREDIT RISK ASSESSMENT AMOUNTS IN NOK MILLION	STAGE 1	STAGE 2	STAGE 3	**TOTAL**
Total loan commitments to amortised cost 01.01.23	86 046	7 692	657	**94 395**
Changes in the period due to loans migrated between the stages				
to (-from) stage 1	2 200	–2 178	–22	**0**
to (-from) stage 2	–7 111	7 165	–54	**0**
to (-from) stage 3	–183	–272	455	**0**
Net increase/(decrease) balance existing loans	–3 548	–833	–97	**–4 478**
Originated or purchased during the period	29 832	4 576	192	**34 600**
Loans that have been derecognised	–19 116	–2 195	–273	**–21 584**
Total loan commitments to amortised cost	88 120	13 955	858	**102 933**
	94 349	16 597	1 415	**112 361**
Loans at fair value through profit and loss				
Total loan commitments as at 31.12.23				**7 313**
	88 120	13 955	858	**110 246**
Off-balance sheet				
Gross loans	–7 711	–1 410	–31	**–9 152**
	80 409	12 545	827	**101 094**
Provision for credit losses - reduction in assets				
Net loans	–152	–343	–261	**–756**
Net loans	80 257	12 202	566	**100 338**

Note 11 Loans

Parent bank					
RISK GROUP 31.12.24 AMOUNTS IN NOK MILLION	STAGE 1	STAGE 2	STAGE 3	LOANS AT FAIR VALUE	**TOTAL**
Very low risk	18 452	1 138		21 853	**41 533**
Low risk	19 758	1 347		13 307	**34 413**
Medium risk	15 670	9 387		3 547	**28 604**
High risk	1 684	2 141		46	**3 871**
Very high risk	348	1 468		58	**1 874**
Commitments in default	60		1 640		**1 700**
Total commitments	56 063	15 481	1 640	38 811	**111 996**
Share commitments	50 %	14 %	1 %	35 %	**100 %**

Group					
RISK GROUP 31.12.24 AMOUNTS IN NOK MILLION	STAGE 1	STAGE 2	STAGE 3	LOANS AT FAIR VALUE	**TOTAL**
Very low risk	12 866	1 157		21 853	**35 876**
Low risk	21 634	1 419		13 307	**36 360**
Medium risk	18 268	9 706		3 547	**31 521**
High risk	2 654	2 416		46	**5 116**
Very high risk	1 317	2 426		58	**3 801**
Commitments in default	60		1 838		**1 898**
Total commitments	56 800	17 124	1 838	38 811	**114 572**
Share commitments	50 %	15 %	2 %	34 %	**100 %**

Parent bank					
RISK GROUP 31.12.23 AMOUNTS IN NOK MILLION	STAGE 1	STAGE 2	STAGE 3	LOANS AT FAIR VALUE	**TOTAL**
Very low risk	37 907	381	0	5 510	**43 798**
Low risk	30 866	899	0	1 341	**33 106**
Medium risk	16 891	7 239	0	387	**24 517**
High risk	1 354	1 946	0	42	**3 342**
Very high risk	445	1 489	0	17	**1 951**
Commitments in default	95	0	740	15	**850**
Total commitments	87 558	11 954	740	7 312	**107 564**
Share commitments	81 %	11 %	7 %	7 %	**100 %**

Group					
RISK GROUP 31.12.23 AMOUNTS IN NOK MILLION	STAGE 1	STAGE 2	STAGE 3	LOANS AT FAIR VALUE	**TOTAL**
Very low risk	33 608	635	0	5 510	**39 753**
Low risk	32 525	995	0	1 341	**34 861**
Medium risk	18 623	7 641	0	387	**26 651**
High risk	2 113	2 319	0	42	**4 474**
Very high risk	1 159	2 365	0	17	**3 541**
Commitments in default	94	0	857	16	**967**
Total commitments	88 122	13 955	857	7 313	**110 247**
Share commitments	80 %	13 %	1 %	7 %	**100 %**

Note 12 Transfers of financial assets

SpareBank 1 Nord-Norge has agreements concerning the legal sale of loans with very good collateral and property mortgages to SpareBank 1 Boligkreditt AS and SpareBank 1 Næringskreditt AS. According to the administration contracts concluded with these two alliance companies, the Bank administers the loans and remains responsible for customer contact. The Bank receives remuneration in the form of commissions for the duties that arise from administering the loans. The Bank has assessed the accounting implications and concluded that the material risk and benefits of ownership associated with the sold loans has been transferred. This entails full derecognition.

The remuneration received for the loans that have been transferred to SpareBank 1 Boligkreditt AS and Spare-Bank 1 Næringskreditt AS matches the book value and is assessed to match the loans fair value at the time of transfer.

From 2018 to 2023, the bank has accounted for parts of the mortgage portfolio that qualify for sale to credit institutions at fair value through profit or loss. Based on the group's financing plan for the next 12 months, relevant loans have been marked as expected to be sold to the credit institution. The bank has separately recognized all rights and obligations created or retained upon transfer as assets or liabilities. From 2024 onwards, all mortgages that qualify for sale to the credit institution are accounted for at fair value through other comprehensive income (OCI).

If the mortgage companies experience a loss on transferred loans, they have some entitlement to offset these against commissions from all banks that have transferred loans. A residual involvement associated with the sold loans therefore exists with a possible limited settlement of losses against commissions.

However, the nature of this right to offset is not regarded as meaning that it changes the conclusion that the majority of the risk and benefits associated with ownership have been transferred. The Bank's maximum exposure to losses is represented by the highest amount that could be claimed covered under the agreements.

The mortgage companies can resell the loans bought from the Bank, while the Bank's right to manage customers and receive commissions remains attached. Should the Bank be unable to serve customers, the right to serve and commissions may lapse.

Furthermore, the Bank has an option to buy back loans under certain conditions. In addition to the general model, there are specific principles for issued loans, including renegotiated loans treated as new, and purchased loans where credit losses have been incurred at initial recognition. For these, an effective interest rate is calculated that takes expected credit losses into account, and changes in expected cash flows should be discounted using the originally determined effective interest rate and recognized in profit or loss. For these assets, there is therefore no need to monitor whether there has been a significant increase in credit risk after initial recognition, as expected losses over the entire lifetime are considered regardless.

SpareBank 1 Boligkreditt AS

SpareBank 1 Boligkreditt AS is owned by the savings banks that make up the SpareBank 1 Alliance, and is collocated with SpareBank 1 Næringskreditt in Stavanger.
The Bank owned a 16.44 % stake as at 31 December 2024 (15,70 % as at 31 December 2023). The purpose of the mortgage company is to ensure alliance banks have access to stable and long-term financing for mortgage loans at competitive prices. SpareBank 1 Boligkreditt's bonds are rated Aaa by Moody's. SpareBank 1 Boligkreditt AS acquires loans with collateral in housing and issues covered bonds in accordance with the regulations established for this.

Home mortgages worth a net NOK 5 billion were sold to SpareBank 1 Boligkreditt in 2024. A total of NOK 44,8 billion had been derecognized in home mortgages sold to SpareBank 1 Boligkreditt AS at the end of the financial year.

SpareBank 1 Næringskreditt AS

SpareBank 1 Næringskreditt was established in 2009 and has a licence from the Financial Supervisory Authority of Norway to operate as a mortgage company. The Bank owned an 0.58 % stake as at 31 December 2024 (1.05 % as at 31 December 2023). The loans transferred to SpareBank 1 Næringskreditt AS are very well secured and have a very small probability of default.

The bonds issued by SpareBank 1 Næringskreditt has an Aaa rating from Moody's. The company is owned by the savings banks that make up the SpareBank 1-alliansen and shares premises with SpareBank 1 Boligkreditt in Stavanger. The purpose of the mortgage company is to ensure alliance banks have access to stable and long-term financing for commercial property at competitive prices. SpareBank 1 Næringskreditt acquires loans backed by commercial property and issues covered bonds in line with the regulations for this. Loans have been transferred to the company as part of the Bank's funding strategy. Loans transferred to SpareBank 1 Næringskreditt are backed by collateral in commercial property within 60 per cent of its valuation.

Loans worth a net NOK 0.077 billion NOK had been derecognized to SpareBank 1 Næringskreditt AS at the end of the financial year.

Note 12 Transfers of financial assets

Liquidity facility

SpareBank 1 Nord-Norge has, together with the other owners of SpareBank 1 Boligkreditt and SpareBank 1 Næringskreditt AS, concluded agreements that establish liquidity facilities for these two companies. This means that the banks have committed to purchase covered bonds in the event that the companies are unable to refinance its activities in the market. Bond purchases are contingent on the company's cover pool not having stopped payments such that it is actually in a position to issue such bonds. Therefore, there is no credit guarantee that can be invoked if the company or its cover pool become insolvent.

Purchases are limited to the total value of the amount due in the company for the next 12 months at any given time. Previous purchases under this agreement are deducted from future purchase obligations. In principle, each owner is liable for its share of the need, or alternatively twice their primary liability under the same agreement. The bonds can be deposited in Norges Bank and thus result in no material increase in risk for the Bank. In line with their internal policies, the companies retain liquidity for the amount due in the next 6 months. This is deducted when valuing the banks' liabilities. Therefore, it would only be after the companies no longer had adequate funding to cover the amount due in the next 12 months that the Bank would report any commitment here in relation to the capital adequacy ratio or major commitments.

Overall, this liability, as at 31.12.24, amounted to NOK 0 million for SpareBank 1 Boligkreditt AS and 0 NOK million for SpareBank 1 Næringskreditt AS.

Note 13 Losses

SpareBank 1 Nord-Norge uses a model to calculate expected credit losses according to IFRS 9.

The calculation of expected credit losses is done monthly and is based on an objective and probability-weighted analysis of alternative outcomes, taking into account the time value of expected cash flows. The analysis is based on relevant information available at the reporting date and incorporates three macroeconomic scenarios to account for non-linear aspects of expected losses.

Future default levels (PD) are predicted based on expected developments in the money market rate and unemployment. Norges Bank's Monetary Policy Report is chosen as the main source for the explanatory variables interest rate and unemployment, as well as expected property price developments. Future loss levels (LGD) are simulated based on collateral values and expectations for price developments for various collateral objects.

The loss model is based on PD and LGD predictions in three different scenarios:

SC1 "Base case": represents the most likely outcome.
SC2 "Downside case": represents an outcome significantly more negative than SC1. The explanatory variables interest rate and unemployment, as well as expected property price developments, are at levels consistent with a severe economic downturn.
SC3 "Best case": represents an outcome significantly more positive than SC1 and reflects the levels of the explanatory variables in a boom.

The levels of the explanatory variables in SC1 will change in line with updated forecasts from the Monetary Policy Report, while the levels of the explanatory variables in SC2 and SC3 will remain more constant as they are based on historical levels from the described economic situations.

The different scenarios are used to adjust relevant parameters for calculating expected losses, and a probability-weighted average of expected losses according to the respective scenarios is recognized as a loss. The weighting in each scenario is still determined based on assessments made by the group regarding national and local macroeconomic developments and perceived uncertainty in SC1.

The macroeconomic situation at the end of 2024 is considered to be somewhat better than at the end of 2023, and the weighting as of 31.12.24 of SC1, SC2, and SC3 was 80/15/5%, compared to 70/25/5% as of 31.12.23.

Developments in industries and individual customers, as well as marking customers with forbearance (payment relief), are closely monitored. If there are indications of conditions that suggest a significant increase in credit risk (SICR), the customer is placed on a so-called watchlist. These indications can, in general, be related to: macroeconomic outlook, industry outlook, customer behavior, or other events. All engagements assessed as high risk are on the watchlist as of 31.12.24, in addition to some engagements in the construction and civil engineering industry. For engagements placed on the watchlist, any accounts are moved from stage 1 to stage 2.

Note 13 Losses

Losses

2023	2024	AMOUNTS IN NOK MILLION	2024	2023
		Losses incorporated in the accounts		
28	**117**	Period's change in individual lending provisions	**102**	59
20	**–42**	Period's change in modelbased lending provisions	**–33**	24
30	**15**	Period's confirmed losses	**48**	44
–8	**–5**	Recoveries, previously confirmed losses	**–8**	–10
71	**85**	**Total losses**	**110**	**116**
		Losses broken down by sector and industry		
62	**26**	Agriculture, forestry and fishin	**23**	73
		Mining and quarrying		–11
–9	**31**	Manufacturing	**31**	5
9	**–4**	Electricity, gas, steam and air conditioning supply	**–4**	9
		Water supply, sewerage, waste managment and remediation activities		–9
26	**14**	Construction	**19**	27
–2	**1**	Wholesale and retail trade, repair of motor vehicles and motorcycles	**16**	–6
8	**5**	Transporting and storage	**7**	14
–4	**3**	Accommodation and food service activities	**3**	–4
2		Information and communication		2
–16	**–20**	Financial and insurance activities	**–20**	–17
–1	**14**	Real estate activities	**13**	–2
3	**–3**	Professional, scientific and technical activities	**–4**	–3
3	**–2**	Administrative and support service activities	**–6**	57
		Public administration and defence; compulsory social security		
	1	Education	**1**	
		Human health and social work activities		
–1	**2**	Arts, entertainment and recreation	**1**	–1
1		Other services activities	**–1**	–9
		Activities of households as employers; undifferentiated goods - and services - producing activities of households for own use		
		Activities of extraterritorial organisations and bodies		
81	**66**	Total corporate market	**82**	125
–11	**18**	Total retail market	**28**	–9
71	**85**	**Total losses**	**110**	**116**

Note 13 Losses

Isolatet loss effects for 2024

PARENT BANK 31.12.2024				GROUP 31.12.2024		
PM	BM	TOTAL	AMOUNTS IN NOK MILLION	TOTAL	PM	BM
16	88	**104**	Change ECL due to period growth and migration	**87**	20	68
2	–78	**–76**	Change ECL due to adjusted key assumptions	**–56**	2	–58
–5	–63	**–70**	Change ECL due to changed scenario weighting	**–64**	–6	–59
11	–53	**–42**	Change in model-based loss provisions (stage 1 and 2)	**–33**	16	–50
19	96	**117**	Change individual loss provisions (stage 3)	**103**	23	80
–12	23	**10**	Change write-offs	**40**	–11	51
18	66	**85**	**Total loss effects**	**110**	28	82

Loss provisions 31.12.2024

PARENT BANK					GROUP			
STAGE 1	STAGE 2	STAGE 3	TOTAL	AMOUNTS IN NOK MILLION	TOTAL	STAGE 3	STAGE 2	STAGE 1
				Change in loss provisions				
–148	–338	–200	**–686**	**Loss provisions 01.01.24**	**–816**	–271	–380	–166
–134	–302	–190	**–625**	Of which presented as a reduction of the assets	**–756**	–261	–343	–152
–14	–36	–10	**–61**	Of which presented as other debt	**–61**	–10	–36	–14
				Changes in the period due to loans migrated between the stages:				
–59	58	1	**0**	to (-from) stage 1	**0**	1	64	–65
16	–25	9	**0**	to (-from) stage 2	**0**	10	–29	19
	6	–6	**0**	to (-from) stage 3	**0**	–8	7	1
43	–117	–120	**–194**	Net increase/-decrease exsisting loans	**–180**	–116	–111	47
–52	–67	–25	**–144**	New issued or purchased loan	**–184**	–26	–101	–58
44	83	17	**144**	Loans that have been derecognised	**153**	18	89	46
41	96	9	**146**	Changes caused by modifications which hasn't resultet in deduction	**166**	12	108	47
–114	–306	–315	**–735**	**Loss provisions 31.12.24**	**–860**	–379	–352	–129
				Loss provisions allocated to markets				
–4	–30	–46	**–80**	Retail market	**–114**	–64	–38	–11
–110	–276	–269	**–655**	Corporate market	**–746**	–315	–314	–117
–114	–306	–315	**–735**	**Loss provisions 31.12.24**	**–860**	–379	–352	–129
–100	–289	–312	**–701**	Of which presented as a reduction of the assets	**–826**	–377	–335	–114
–14	–17	–3	**–34**	Of which presented as other debt	**–34**	–3	–17	–14

Note 13 Losses

Loss provisions 31.12.2023								
PARENT BANK					GROUP			
STAGE 1	STAGE 2	STAGE 3	TOTAL	AMOUNTS IN NOK MILLION	TOTAL	STAGE 3	STAGE 2	STAGE 1
				Change in loss provisions				
–199	–281	–159	**–639**	**Loss provisions as at 01.01.23**	**–735**	–190	–318	–228
–176	–238	–153	**–567**	Of which presented as a reduction of the assets	**–663**	–184	–275	–204
–23	–43	–6	**–72**	Of which presented as other debt	**–72**	–6	–43	–23
				Changes in the period due to loans migrated between the stages:				
–96	94	2	**0**	to (-from) stage 1	**0**	2	98	–101
38	–43	5	**0**	to (-from) stage 2	**0**	8	–48	40
1	3	–4	**0**	to (-from) stage 3	**0**	–5	5	1
54	–110	–47	**–103**	Net increase/-decrease excisting loans	**–118**	–86	–94	63
–65	–153	–13	**–231**	New issued or purchased loan	**–272**	–16	–186	–70
67	84	14	**164**	Loans that have been derecognised	**169**	14	87	68
54	68	2	**123**	Changes caused by modifications which hasn't resultet in deduction	**138**	2	76	60
–148	–338	–200	**–686**	**Total loss provisions as at 31.12.23**	**–816**	–271	–380	–166
				Loss provisions allocated to markets				
–10	–23	–35	**–69**	Retail market	**–91**	–47	–29	–15
–137	–315	–165	**–617**	Corporate market	**–725**	–224	–350	–151
–148	–338	–200	**–686**	**Total loss provisions as at 31.12.23**	**–816**	–271	–380	–166
–134	–302	–190	**–625**	Of which presented as a reduction of the assets	**–756**	–261	–343	–152
–14	–36	–10	**–61**	Of which presented as other debt	**–61**	–10	–36	–14

Note 13 Losses

Sensitivity analysis

The table below shows the ECL calculated for the three applied scenarios in isolation. The calculations are broken down into the main segments retail customers and corporate customers, which add up to Parent Bank.

Beyond segment distributed ECL through the applied scenario weighting (80/15/5 per cent), the table shows two alternative scenario weightings, with adjustments for the probability of the expected scenario (75/15/10 per cent, and 80/10/10 per cent).

31.12.2024			
AMOUNTS IN NOK MILLION	PM	BM	PARENT BANK
ECL in Base cenario	57 285	341 855	399 140
ECL in Downturn scenario	124 161	940 291	1 064 452
ECL in Upturn scenario	38 789	198 690	237 479
ECL with used scenarioweightning (80/15/5)	**66 400**	**424 402**	**490 802**
Sensitivity:			
ECL with alternative scenario weightning (75/15/10)	65 467	417 304	482 771
ECL with alternative scenario weighting (80/10/10)	62 123	387 382	449 505

31.12.2023			
AMOUNTS IN NOK MILLION	PM	BM	PARENT BANK
ECL in Base cenario	40 062	347 774	387 836
ECL in Downturn scenario	100 353	914 688	1 015 041
ECL in Upturn scenario	23 175	122 698	145 873
ECL with used scenarioweightning (70/25/5)	**54 288**	**478 243**	**532 531**
ECL with alternative scenario weighting (50/40/10)	62 485	552 024	614 509
ECL with alternative scenario weightning (55/35/10)	59 470	523 679	583 149
ECL with alternative scenario weighting (65/25/10)	53 441	466 990	520 431
ECL with alternativw scenario weightning (60/30/10)	56 456	495 334	551 790

Note 14 Marked risk related to interest rate risk

The value of the Group's interest-bearing financial instruments is affected by changes in market interest rates. The calculations set out in the table below assume that all market interest rates in all currencies within the respective maturity intervals have changed by 2 percentage points in the disfavour of the Group's positions. The calculations are thus an estimate of the Group's maximum financial loss due to changes in market interest rates.

The calculations are based on the Group's positions and market interest rates as at 31.12.24, and all interest rate sensitive financial instruments have been included in the calculations. For more detailed information about group's controll of interest rate risk, see Pilar-3 report.

The parent company and the group numbers are equal.

Group 31.12.24

AMOUNTS IN NOK MILLION	UP TO 1 MONTH	FROM 1 MONTH TO 3 MONTHS	FROM 3 MONTHS TO 1 YEAR	FROM 1 YEAR TO 5 YEARS	OVER 5 YEARS	TOTAL
NOK	–12	–39	27	7		**–17**
EUR	1	2				**3**
USD						
CHF	–8	–3	–1		–1	**–13**
Other currencies	1					**1**
Total	–18	–40	26	7	–1	**–26**

Group 31.12.23

AMOUNTS IN NOK MILLION	UP TO 1 MONTH	FROM 1 MONTH TO 3 MONTHS	FROM 3 MONTHS TO 1 YEAR	FROM 1 YEAR TO 5 YEARS	OVER 5 YEARS	TOTAL
NOK	12	15	–35	–6	1	**–13**
EUR	–1	–2	0	0	0	**–3**
USD	0	0	0	0	0	**0**
CHF	4	4	0	0	0	**8**
Other currencies	0	0	0	0	0	**0**
Total	15	17	–35	–6	1	**–8**

Note 15 Market risk relating to foreign exchange risk

Currency risk is the risk of the Group incurring losses due to changes in exchange rates. The risk arises from the Group having differences between assets and liabilities in the individual currency. The Board has decided that the Group's total net currency position, measured pursuant to the CRR/CRD IV regulations, must amount to less than 2 % of the Group's primary capital. For detailed information about the Group's management and control of currency risk, see the Pillar 3 report.

The table states the Group's net currency exposure as at 31.12.24. The parent bank and group numbers are equal.

Group

AMOUNTS IN NOK MILLION	2024	2023
USD	**8**	12
EUR	**12**	7
CHF	**8**	–1
SEK	**-2**	0
OTHER	**5**	1
Total	**31**	19

- Positive numbers means that there are net assets in a currency, and it will have a positive effect if NOK weakens.
- Negative numbers means that we have net debt in a currency, and it will have a negative effect if NOK weakens.

Note 16 Financial derivatives

SpareBank 1 Nord-Norge concludes hedging transactions with recognised Norwegian and foreign banks to reduce its risk. Derivative transactions are linked to ordinary banking operations and are carried out to reduce the risk associated with the bank's borrowing (funding) in the financial markets, and to reveal and reduce risk related to customer-oriented activities. Only hedges associated with the bank's funding activities are defined as fair value hedging pursuant to IAS 39. The Bank does not utilise cash low hedging.

The bank's Board has set limits for the maximum risk for the bank's interest rate positions. Routines have been established that ensure the stipulated limits are adhered to.

Currency- and interest rate contracts consist of:

Interest rate swaps: Commitments to exchange one set of cash flow for another over an agreed period.

Foreign exchange derivatives: Agreements to buy or sell a fixed amount of currency at an agreed future date and at an agreed rate.

Currency swaps: Agreements relating to the swapping of currency- and interest rate terms and conditions, periods and amounts having been agreed in advance

Parent bank and group

AMOUNTS IN NOK MILLION	31.12.24	31.12.23
Net losses recognised related to hedging instruments for fair value hedging	**102**	289
Total gains on hedged items related to the hedged risk	**-107**	–292
Total fair value hedges	**-6**	–4

Note 16 Financial derivatives

Foreign currency- and interest rate instruments by fair value through profit and loss account	2024			2023		
	CONTRACT/ NOTIONAL AMOUNT	FAIR VALUE		CONTRACT/ NOTIONAL AMOUNT	FAIR VALUE	
AMOUNTS IN NOK MILLION		ASSETS	LIABILITES		ASSETS	LIABILITES
Foreign currency instruments						
Foreign exchange financial derivatives (forwards)	**2 822**	**13**	**42**	3 147	40	37
Currency swaps	**10 808**	**92**	**55**	9 707	96	177
Total foreign currency instruments	**13 640**	**105**	**97**	12 854	136	214
Interest rate instruments						
Interest rate swaps (including cross currency)	**55 908**	**1 229**	**753**	46 686	1 195	615
Short interest rate swaps (FRA)	**650**					
Other interest rate contracts	**798**	**29**	**26**	618	23	21
Total non-standardized contracts	**57 356**	**1 259**	**780**	47 303	1 218	636
Standardised interest rate contracts (futures						
Total interest rate instruments	**57 356**	**1 259**	**780**	47 303	1 218	636
Securing of funding						
Interest rate instruments						
Interest rate swaps (including cross currency	**11 677**	**167**	**214**	11 366	68	348
Total interest rate instruments	**11 677**	**167**	**214**	11 366	68	348
Total foreign currencyand interest rate instruments						
Total, interest rate instruments	**69 033**	**1 426**	**994**	58 669	1 286	984
Total currency swaps and forwards	**13 640**	**105**	**97**	12 854	136	214
Total	**82 673**	**1 532**	**1 086**	**71 523**	**1 422**	**1 198**

Note 17 Remaining contract-related periods for liabilities

Liquidity risk

Liquidity risk is the risk that the Bank will be unable to meet its payment obligations, and/or the risk of not being able to fund a desired growth in assets. SpareBank 1 Nord-Norge prepares an annual liquidity strategy that, for example, sets limits and targets for the Bank's liquidity risk.

The Group's liquidity risk is identified when raising external capital, as well as through the Bank's liquidity reserve/buffer, including the sale of mortgages to SpareBank 1 Boligkreditt AS. See Note 12 for more information.

The Bank proactively manages the Group's liquidity risk on a daily basis. SpareBank 1 Nord-Norge must comply with the regulatory minimum requirements for prudent liquidity management at all times.

The average remaining term to maturity for the Bank's debt securities issued was 2.9 years as at 31.12.24 (2.7 years). The short-term liquidity risk measurement, the liquidity coverage ratio (LCR), was 147 per cent (150 per cent) as at the end of the year.

The table below shows receipts and payments, including future interest payments, at various points in time.

Parent Bank 2024

AMOUNTS IN NOK MILLION	ON REQUEST	UNDER 3 MONTHS	3-12 MONTHS	1 - 5 YEAR	OVER 5 YEARS	TOTAL	BOOKED VALUE
Liabilities to credit institutions	308	455				**763**	**763**
Debt securities in issue	79 197		8 530			**87 727**	**87 727**
Liabilities relating to deferred tax		151	4 322	5 698	2 805	**12 976**	**13 756**
Derivatives	1 086					**1 086**	**1 086**
Contract-related outgoing cash flows		–576	–299	–9 351	–1 212	**–11 438**	
Contract-related incoming cash flows		697	391	9 440	1 345	**11 873**	
Other liabilities	3 284					**3 284**	**3 284**
Subordinated loan capital and senior non-preferred		147	1 355	7 754	2 081	**11 337**	**9 435**
Total liabilities	83 875	874	14 299	13 541	5 019	**117 537**	**115 979**

Parent Bank 2023

AMOUNTS IN NOK MILLION	ON REQUEST	UNDER 3 MONTHS	3-12 MONTHS	1 - 5 YEAR	OVER 5 YEARS	TOTAL	BOOKED VALUE
Liabilities to credit institutions	175	990				**1 165**	**1 165**
Debt securities in issue	74 566		7 994			**82 560**	**82 560**
Liabilities relating to deferred tax		1 245	3 262	8 941	3 965	**17 413**	**13 970**
Derivatives	1 198					**1 198**	**1 198**
Contract-related outgoing cash flows		–531	–275	–8 029	–1 487	**–10 322**	
Contract-related incoming cash flows		541	365	8 409	1 561	**10 876**	
Other liabilities	3 055					**3 055**	**3 055**
Subordinated loan capital and senior non-preferred		134	219	5 804	4 004	**10 162**	**8 367**
Total liabilities	78 994	2 245	11 345	9 321	4 040	**105 945**	**110 315**

Note 17 Remaining contract-related periods for liabilities

Group 2024

AMOUNTS IN NOK MILLION	ON REQUEST	UNDER 3 MONTHS	3-12 MONTHS	1 - 5 YEAR	OVER 5 YEARS	TOTAL	BOOKED VALUE
Liabilities to credit institutions	306	455				**761**	**761**
Debt securities in issue	79 088		8 529			**87 618**	**87 618**
Liabilities relating to deferred tax		151	4 322	5 698	2 805	**12 976**	**13 756**
Derivatives	1 086					**1 086**	**1 086**
Contract-related outgoing cash flows		–576	–299	–9 351	–1 212	**–11 438**	
Contract-related incoming cash flows		697	391	9 440	1 345	**11 874**	
Other liabilities	3 678					**3 678**	**3 678**
Subordinated loan capital and senior non-preferred		147	1 355	7 754	2 081	**11 337**	**9 435**
Total liabilities	84 159	873	14 299	13 541	5 020	**117 892**	**116 334**

Group 2023

AMOUNTS IN NOK MILLION	ON REQUEST	UNDER 3 MONTHS	3-12 MONTHS	1 - 5 YEAR	OVER 5 YEARS	TOTAL	BOOKED VALUE
Liabilities to credit institutions	175	989				**1 164**	**1 164**
Debt securities in issue	74 514		7 981			**82 495**	**82 495**
Liabilities relating to deferred tax		1 245	3 262	8 941	3 965	**17 413**	**13 970**
Derivatives	1 198					**1 198**	**1 198**
Contract-related outgoing cash flows		–531	–275	–8 029	–1 487	**–10 322**	
Contract-related incoming cash flows		541	365	8 409	1 561	**10 876**	
Other liabilities	3 754					**3 754**	**3 754**
Subordinated loan capital and senior non-preferred		134	219	5 804	4 004	**10 162**	**8 367**
Total liabilities	79 641	2 378	11 552	15 126	8 044	**116 740**	**110 948**

Note 18 Maturity analysis of assets and liabilities

The table shows whether assets and liabililties have maturity dates within one year after the balance sheet date.

Parent Bank 31.12.24

AMOUNTS IN NOK MILLION	ON DEMAND	UNDER 3 MONTHS	3–12 MONTHS	1–5 YEARS	OVER 5 YEARS	TOTAL
Assets						
Cash and balances with central banks	1 404					**1 404**
Loans and advances to credit institutions	597	9 307		166		**10 070**
Loans and advances to customers	7 635	320	2 797	19 956	62 443	**93 151**
Provision for credit losses – stage 3					-312	**-312**
Provision for credit losses – stage 2					-289	**-289**
Provision for credit losses – stage 1					-100	**-100**
Shares	1 473				49	**1 522**
Bonds and certificates - fair value		464	1 056	14 662	3 051	**19 233**
Financial derivatives	1 532					**1 532**
Investments in Group companies					1 752	**1 752**
Investment in associated companies and joint ventures					4 684	**4 684**
Property, plant and equipment					398	**398**
Intangible assets						
Other assets	18	312	203			**533**
Total assets	12 659	10 403	4 056	34 784	71 676	**133 578**
Liabilites						
Liabilities to credit institutions	308	455				**763**
Deposits from customers	79 197		8 529			**87 726**
Debt securities in issue		1 395	2 931	7 840	1 590	**13 756**
Financial derivatives	1 086					**1 086**
Other liabilities	3 172					**3 172**
Deferred tax					41	**41**
Subordinated loan capital		147	1 355	5 852	2 081	**9 435**
Total liabilities	83 753	1 997	12 816	13 692	3 711	**115 979**

Note 18 Maturity analysis of assets and liabilites

Parent Bank 31.12.23						
AMOUNTS IN NOK MILLION	ON DEMAND	UNDER 3 MONTHS	3–12 MONTHS	1–5 YEARS	OVER 5 YEARS	TOTAL
Assets						
Cash and balances with central banks	402					**402**
Loans and advances to credit institutions	827	8 307		166		**9 300**
Loans and advances to customers	7 674	404	2 187	16 838	62 609	**89 712**
Provision for credit losses – stage 3					–190	**–190**
Provision for credit losses – stage 2					–302	**–302**
Provision for credit losses – stage 1					–134	**–134**
Shares	1 311				48	**1 359**
Bonds and certificates - fair value		154	690	13 656	3 686	**18 186**
Financial derivatives	1 422					**1 422**
Investments in Group companies					1594	**1 594**
Investment in associated companies and joint ventures					4164	**4 164**
Property, plant and equipment					402	**402**
Intangible assets	73					**73**
Other assets	5		98		329	**432**
Total assets	11 714	8 865	2 975	30 660	72 207	**126 420**
Liabilites						
Liabilities to credit institutions	175	989				**1 164**
Deposits from customers	74 566		7 994			**82 560**
Debt securities in issue		1 395	2 931	7 840	1 804	**13 970**
Financial derivatives	1 198					**1 198**
Other liabilities	3 057					**3 057**
Deferred tax					0	**0**
Subordinated loan capital		60	271	7 635	400	**8 366**
Total liabilities	78 996	2 444	11 196	15 475	2 204	**110 315**

Note 18 Maturity analysis of assets and liabilites

Group 31.12.24						
AMOUNTS IN NOK MILLION	ON DEMAND	UNDER 3 MONTHS	3–12 MONTHS	1–5 YEARS	OVER 5 YEARS	TOTAL
Assets						
Cash and balances with central banks	1 404					**1 404**
Loans and advances to credit institutions	597	1 797				**2 394**
Loans and advances to customers	8 784	332	2 959	23 403	67 176	**102 654**
Provision for credit losses – stage 3					–377	**–377**
Provision for credit losses – stage 2					–335	**–335**
Provision for credit losses – stage 1					–114	**–114**
Shares	1 478				49	**1 527**
Bonds and certificates – fair value		464	1 056	14 662	3 053	**19 235**
Financial derivatives	1 532					**1 532**
Investment in associated companies and joint ventures					5 981	**5 981**
Property, plant and equipment					811	**811**
Intangible assets	193					**193**
Other assets	89	312	367			**768**
Total assets	14 077	2 095	4 382	38 065	76 244	**135 673**
Liabilities						
Liabilities to credit institutions	308	453				**761**
Deposits from customers	79 096		8 522			**87 618**
Debt securities in issue		1 395	2 931	7 840	1 590	**13 756**
Financial derivatives	1 086					**1 086**
Other liabilities	3 491					**3 491**
Deferred tax					187	**187**
Subordinated loan capital		147	1 355	5 852	2 081	**9 435**
Total liabilities	83 981	1 995	12 808	13 692	3 858	**116 334**

Note 18 Maturity analysis of assets and liabilites

Group 31.12.23						
AMOUNTS IN NOK MILLION	ON DEMAND	UNDER 3 MONTHS	3–12 MONTHS	1–5 YEARS	OVER 5 YEARS	TOTAL
Assets						
Cash and balances with central banks	402					**402**
Loans and advances to credit institutions	849	1 455				**2 304**
Loans and advances to customers	8 342	442	2 430	20 516	67 095	**98 789**
Provision for credit losses – stage 3					–261	**–261**
Provision for credit losses – stage 2					–343	**–343**
Provision for credit losses – stage 1					–152	**–152**
Shares	1 316				48	**1 364**
Bonds and certificates – fair value		154	692	13 656	3 686	**18 189**
Financial derivatives	1 422					**1 422**
Investments in Group companies						
Investment in associated companies and joint ventures					4 858	**4 858**
Property, plant and equipment					811	**811**
Non-current assets held for sale						
Intangible assets	193					**193**
Other assets			354		208	**562**
Total assets	12 524	2 051	3 476	34 172	75 914	**128 138**
Liabilities						
Liabilities to credit institutions	175	988				**1 163**
Deposits from customers	74 513		7 981			**82 494**
Debt securities in issue		1 395	2 931	7 840	1 804	**13 970**
Financial derivatives	1 198					**1 198**
Other liabilities	3 705					**3 705**
Deferred tax					51	**51**
Subordinated loan capital		60	272	7 635	400	**8 367**
Total liabilities	79 591	2 443	11 184	15 475	2 255	**110 948**

Note 19 Net interest income

PARENT BANK					GROUP			
4.KV.23	**4.KV.24**	31.12.23	**31.12.24**	AMOUNTS IN NOK MILLION	**31.12.24**	31.12.23	**4.KV.24**	4.KV.23
				Interest income				
99	**126**	364	**446**	Interest income from loans to other credit institutions (amortized cost)	**50**	41	**20**	3
1 298	**940**	3 019	**3 649**	Interest income from loans to customers (amortized cost)	**4 397**	5 391	**1 133**	1 541
89	**43**	284	**163**	Interest income from loans to customers (fair value profit and loss)	**163**	284	**43**	89
62	**557**	1 703	**2 220**	Interest income from loans to customers (fair value other comprehensive income)	**2 220**	0	**557**	0
254	**261**	844	**1 057**	Interest income from certificates and bonds (fair value profit and loss)	**1 057**	845	**261**	255
1 802	**1 927**	6 214	**7 535**	**Total interest income**	**7 887**	6 561	**2 014**	1 888
				Interest expenses		0		
38	**69**	113	**204**	Interest cost on debt to other credit institutions (amortized cost)	**183**	95	**62**	31
569	**643**	1 845	**2 511**	Interest cost on debt to customers (amortized cost)	**2 509**	1 843	**644**	568
238	**163**	809	**732**	Interest cost on the issued securities (amortizes cost)	**732**	846	**129**	251
42	**104**	138	**380**	Interest cost on subordinated capital and debt (amortized cost)	**380**	101	**138**	29
887	**979**	2 905	**3 827**	**Total interest expenses**	**3 804**	2 885	**973**	879
12	**14**	49	**55**	Guarantee fund fee	**55**	49	**14**	12
903	**934**	3 260	**3 653**	**Net interest income**	**4 028**	3 627	**1 027**	997
2,85 %	**2,80 %**	2,60 %	**2,79 %**	Net interest margin relative to average total assets	**3,04 %**	2,85 %	**3,04 %**	2,85 %

Note 20 Net fee-, commission- and other operating income

PARENT BANK			GROUP	
2023	2024	AMOUNTS IN NOK MILLION	2024	2023
		Fees and commissions receivable		
282	**299**	Payment facilities	**299**	282
203	**202**	Insurance products	**202**	203
43	**47**	Guarantee commissions	**47**	43
		Real estate broking	**219**	183
54	**55**	Portefolio commissions	**55**	54
67	**71**	Credit commissions	**71**	67
20	**15**	Other commissions 1)	**14**	14
669	**689**	**Commissions ex. comission loans**	**907**	847
115	**179**	Comission from SpareBank 1 Boligkreditt and SpareBank 1 Næringskreditt	**179**	115
784	**868**	**Total commision loans income**	**1 086**	962
67	**63**	**Commission costs**	**81**	90
		Accounting services	**335**	292
234	**188**	Other income 2)	**201**	240
234	**188**	**Total other income**	**536**	532
951	**993**	**Total commission- and other income**	**1 541**	1 404

1) EiendomsMegler 1 Nord-Norge has previously practiced gross recording of customer outlays. This has changed as of 3Q24, and the company now nets these items. Comparative figures for 2023 have been revised in this regard.
2) Of this, value adjustment of receivables from SNN Pensjonskasse per 31.12.24, with NOK 176 million.

Note 21 Gains from other financial investments

The table shows gains and losses, as well as dividends received. In addition, profit shares from ownership interests in associated companies and joint ventures according to the equity method, as well as unrealized changes in value of shares, mutual fund bonds, bonds and derivatives that are assessed at fair value above profit in accordance with IFRS9.

PARENT BANK			GROUP	
2023	2024	AMOUNTS IN NOK MILLION	2024	2023
		Income from equity capital instruments		
98	**77**	Dividend from shares	**77**	98
3	**4**	Dividend/interest from Hybrid capital	**4**	3
716	**280**	Dividend from group companies, assosiated companies and joint ventures		
		Share result (Equity Method) from assosiated companies and joint ventures 1)	**374**	–56
8	**163**	Gains/losses from shares	**163**	105
		Gains/losses from group companies, assosiated companies and joint ventures	**452**	
		Income from certificates and bonds		
–10	**–2**	Gains/losses from certificates and bonds	**–2**	–10
		Income from financial derivatives		
49		Gains/losses from currencies and hedge derivatives		49
–6	**–12**	Gains/losses from fixed rate loans to customers	**–12**	–6
858	**510**	**Total net income from financial investments**	**1 056**	183

1) As announced in the stock exchange announcement on 28.06.24, Eika Forsikring AS entered Fremtind Holding AS's group at fair value from 01.07.24, which contributed to increasing the equity in the SpareBank 1 Gruppen Group by NOK 7 billion. Of this, the controlling owner's share amounted to NOK 2,317 million. kroner. SpareBank 1 Nord-Norge's share, NOK 452 million, is booked as a realized gain, and is included on the line Share result from assosiated companies and joint ventures in the profit and loss account.

Note 22 Personnel costs, benefits, loans and equity certificates – executive personnel and board members

Personnel cost, number of employees and man-years				
PARENT BANK			GROUP	
2023	2024	AMOUNTS IN NOK MILLION	2024	2023
458	**483**	Wages and salaries	**839**	786
45	**51**	Pension cost	**83**	61
116	**133**	Social cost	**181**	139
619	**667**	**Total Personnel cost**	**1 103**	986
521	**541**	Number of man-years as of 31.12	**986**	956
545	**572**	Number of employees as of 31.12	**1 045**	997
539	**559**	Average number of employees	**1 021**	944

The Group does not have share value based compensation.

Information on benefits for the executive personnel and board members for 2024 is in accordance with The Norwegian Accounting Standards, paragraph §7-26, §7-31 b and §7-32. In addition to compensation and pensions, this note gives an overview of loans to executive personnel and board members (incl. their close relatives) as of 31.12.24, and the number of equity certificates owned by executive personnel and board members (incl. their close relatives) as of 31.12.24. The CEO and executive directors have, upon termination, renounced their job protection under the Working Environment Act in return for severance pay of 12 months' salary, with additional salary during the period of notice. The severance pay is deducted from income from another employer paid during the period, with the exception of board fees.

Total remuneration of the executive personnel and board members is as follows		
AMOUNTS IN NOK THOUSAND	2024	2023
Short-term benefits:		
Wages and salaries	**28 495**	29 279
Yearly bonus		253
Employee benefits	**1 767**	703
Board fees in the Group and Alliance companies	**1 084**	2 212
Board fees in SpareBank 1 Nord-Norge	**3 422**	3 293
Other benefits to board members	**40**	12
Long-term benefits:		
Pension	**3 428**	3 642
Other benefits		
Loan to the executive personnel incl. close relatives. Executive personnel have employee terms on their loans	**43 509**	60 839
Loan to the board members, incl. close relatives. Terms and conditions, collateral and other security are the same as for ordinary customers, with the exeption of employees' elected representatives for whom terms and conditions are the same as for other employees.	**9 598**	13 517
Other:		
Number of Equity certificates owned by the executive personnel incl. close relatives	**358 661**	313 453
Number of Equity certificates owned by the board members incl. close relatives	**110 678**	33 164

Benefits to employees		
AMOUNTS IN NOK MILLION	2024	2023
Total loans to employees (incl. executive personnel)	**1 229**	1 351
The aggregate value of interest rate subsidies relating to loans to employees	**13**	20

REPORT ON REMUNERATION TO LEADING PERSONS 2024

Report on salary and other remuneration to leading persons in listed companies follows from the Public Limited Companies Act § 6-16 b and is further described in the regulation on guidelines and report on remuneration for leading persons after § 6, and was dealt with by the Board on 12.02.25.

Fixed salary includes agreed salary and other fixed remunerations such as broadband subsidy and fixed car allowance.

Employee benefits for The CEO, executive directors, and managing directors, have include discounted insurance schemes, favorable loans and deposit interest, equity certificate savings program, and employee insurances.

Variable remuneration includes any variable appreciations.

Pension cost is divided into two columns, where the first column refers to pension savings under 12 G, in the form of our contribution pension scheme (same for everyone), and the second column is for savings over 12 G which is agreed for the group management, and directors in SNN Finans and Regnskapshuset. Savings over 12 G are for 2024 at 15%.

The proportion of fixed and variable remuneration is the proportion the fixed and variable remuneration constitutes of total remuneration.

Companies in the same group or corporate group contain fees that the individual has received for roles or duties in SpareBank 1 Alliance, but not wholly-owned subsidiaries. For wholly-owned subsidiaries, the group management receives no fees.

All numbers are rounded to the nearest thousand.

Loans and Equity Certificates show the sum incl. close associates.

Leading Persons	FIXED COMPENSATION		VARIABLE COMPENSATION		PENSION COST		TOTAL COMPENSATION IN SNN	PERCENTAGES OF SALARY AND OTHER COMPENSATION		ENTERPRISE IN THE SAME CORPORATE GROUP	NO. OF EQUITY CAPITAL CERTIFICATES	LOAN
AMOUNTS IN NOK THOUSAND	SALARY	FRINGE BENEFITS	ONE YEAR	MULTI-YEAR	PENSION EXPENSE BELOW 12 G	OVER 12 G						
Liv B. Ulriksen *CEO*	3 847	117			183	400	4 547	85 %	15 %		90 046	7 577
Trude Glad *Executive vice president Corporate Banking*	3 025	83			183	223	3 514	86 %	14 %	163	81 871	638
Bjørn Bardal *Acting executive vice president Personal Banking from 21.12.24*	1 506	93			183		1 782	85 %	15 %		14 658	1 759
Lasse Hagerupsen *Executive vice president Personal Banking*	2 500	90			183	131	2 904	86 %	14 %	283	98 489	
Bengt Olsen *Chief Financial Officer*	3 260	108			183	243	3 794	86 %	14 %	578	51 700	3 500
Turid Aspenes *Chief of staff*	2 335	118			183	99	2 735	85 %	15 %		4 133	4 389
Stein Vidar Loftås *Chief Communications Officer*	2 514	112			183	79	2 888	87 %	13 %		7 766	6 771
Marius Nilsen *Chief Risk Officer*	2 399	131			183	123	2 836	85 %	15 %		201	7 993
Bjørn-Tore Markussen *Chief Innovation Officer (until April)*	1 236	588			64		1 888	65 %	35 %			
Birgitte Nygård Vibe *Chief Innovation Officer (from October)*	1 562	3			45		1 610	35 %	65 %		4 268	
Johan Thomas Hegdahl *Director Regnskapshuset*	1 943	68			92	40	2 143	91 %	9 %		454	3 100
Kristin Amundsen *Director Eiendomsmegler 1*	2 124	99			152	66	2 441	87 %	13 %	60	1 984	4 311
Niclas Aafos *Director of SNN Finans*	1 750	157			183	24	2 024	86 %	14 %		3 091	5 230
	30 001	**1 767**			**2 000**	**1 428**	**35 196**			**1 084**	**358 661**	**43 509**

Board members AMOUNTS IN NOK THOUSAND	FIXED REMURATION			VARIABLE REMURATION		TOTAL	NUMBER OF EQUITY CERTIFI-CATES	LOANS
	BOARD FEES	FEES	EMPLOYEE BENEFITS	OTHER BENEFITS	VARIABLE OVER SERVERAL YEARS			
Eirik Frantzen, Board chair	696					696		3 482
Kjersti Terese Stormo, Deputy chair	424			20		444	3 138	
Rolf-Eigil Bygdnes, Board member	263					263	76 774	
Trude Slettli, Board member	340			20		360	2 885	2 191
Kathrine Tveiterås, Board member	340					340		
Sigurd Carlsen, Board member	413					413	3 000	
Semming Semmingsen, Board member	315					315	186	
May-Britt Nilsen, Employee representative	288					288	22 298	2 813
Kjetil Berntsen, Employee representative	343					343	2 394	3 303
Total for the Board of Directors	**3 422**			**40**		**3 462**	**110 678**	**9 598**

Board remuneration refers to the board remuneration and remuneration for board committees.
Variable remuneration applies to the equity certificate savings program for Kjersti Terese Stormo for 2021 savings.
Total remuneration is the sum of all remunerations.
Loans and Equity Certificates show the sum including close associates.

Note 23 Operating costs

PARENT BANK			GROUP	
2023	2024	AMOUNTS IN NOK MILLION	2024	2023
619	**667**	Personnel expenses	**1 103**	986
299	**345**	IT expenses	**372**	323
157	**161**	Administrative expenses	**194**	193
60	**58**	Ordinary depreciation	**84**	88
18	**20**	Operating costs properties	**24**	21
125	**140**	Other operating expenses	**227**	214
1 278	**1 391**	**Total operating costs**	**2 004**	1 825

External auditor`s fees

PARENT BANK			GROUP	
2023	2024	AMOUNTS IN NOK MILLION	2024	2023
2 548	**3 838**	Statutory auditing	**5 307**	3 659
892	**1 337**	Other certification services 1)	**1 447**	915
210	**215**	Other non-audit services 2)	**215**	210
3 651	**5 390**	**Total auditor`s fee**	**6 969**	4 784

1) Statutory audit includes ordinary audit and audit of quarterly reports.
2) Other attestation services include attestation of sustainability reporting.

Note 24 Pensions

In 2024, SpareBank 1 Nord-Norge had the following pension schemes for its employees.

A defined contribution pension scheme for retirement and disability pensions taken out with SpareBank 1 Forsikring AS.

The 2024 saving rates for defined contribution pensions are:

- Salary equivalent to 0 to 7.1 G: 7%
- Salary equivalent to 7.1 to 12 G: 20%

Other pension schemes

The Group has agreements on early retirement and supplementary pensions for its executive employees.

At the end of 2024, only one active employee will be included in the early retirement scheme. Early retirement is financed through operations.

Most of the companies in the Group are members of the private sector tariff-based pension scheme, AFP. The private AFP scheme provides a lifelong supplement to the ordinary pension. The private AFP scheme will be funded through an annual premium that is set as a percentage of salary between 1G and 7.1G. The premium for 2024 was set at 2.7 per cent (2.6 per cent in 2023). Annual premium for 2025 is set as 2.7 per cent.

Note 25 Tax

Taxes recognised in the profit and loss account comprise tax payable for the period and deferred taxes. Tax payable for the period is calculated tax on the current year's taxable profit. Deferred taxes are accounted for by means of the liability method in accordance with IAS 12. Deferred tax liabilities or assets are recognised in respect of all temporary differences, which arise as a difference between the carrying amount and taxable value of assets and liabilities at the balance sheet date.

However, no liabilities or assets are calculated for deferred taxes on goodwill that do not give a tax deduction or items that are recognised for the first time and do not affect the financial or taxable profit. Deferred tax assets are calculated with respect to accumulated tax losses carried forward at the balance sheet date. Deferred tax assets are recognised only to the extent that it is probable that the taxable profit will be available and unused tax losses can be utilised. Wealth tax is calculated and recognised as other operating expenses in the profit and loss account.

Note 25 Tax

PARENT BANK			GROUP	
2023	2024	AMOUNTS IN NOK MILLION	2024	2023
		Major components of income tax		
655	**668**	Current tax costs	**713**	699
16	**113**	Change in deferred tax	**136**	26
671	**781**	**Income tax for the period**	**849**	725
		Change in net deferred tax		
16	**113**	Change in deferred tax recognised in the income statement	**136**	26
16	**113**	**Total change in net deferred tax/-asset**	**136**	26
		Temporary differences and deferred tax		
–73	**–65**	Tangible fixed assets	**575**	456
79	**255**	Pension liabilities/-fond	**264**	88
–294	**–27**	Other temporary differences	**–67**	–310
		Loss carried forward	**–26**	–32
–288	**163**	**Total temporary differences**	**746**	202
72	**–41**	**Deferred tax/-asset in balance sheet**	**187**	–51
		Change in temporary differences		
10	**–8**	Tangible fixed assets	**–119**	25
	–176	Pension liabilities	**–176**	
52	**–267**	Other temporary differences	**–243**	78
		Correction from previous year		1
		Loss carried forward	**–6**	1
62	**–451**	**Total changes in temporary differences**	**–544**	105
		Reconciliation of tax charge for the period recognised against profit and loss to profit before tax		
930	**920**	25% of profit before tax	**1 128**	818
–197	**–125**	Non-taxable profit and loss items – dividends etc/result from associated companies and joint ventures	**–267**	–32
–57	**0**	Non-taxable profit and loss items – non taxable sale of business	**0**	–57
–15	**–25**	Tax effect from interests in hybrid capital presented as equity	**–25**	–15
7	**7**	Non-taxable profit and loss items – wealth tax	**7**	7
3	**4**	Non-taxable profit and loss items – others	**6**	4
671	**781**	**Taxation charge for the period**	**849**	725
18,0 %	**21,2 %**	**Effective tax rate (income tax for the period expressed as a percentage of profit before tax)**	**18,8 %**	22,2 %

Note 26 Financial instruments at fair value

The table below contains financial assets and liabilities that are classified as held for sale or which it has been decided to measure at fair value through profit and loss upon initial recognition.

Fair value is the amount an asset can be sold for, or a liability can be settled for, in a transaction between two independent parties.

The value is set using different methods within three levels:

Level 1: Financial instruments that are valued using listed prices in active markets for identical assets or liabilities. The category includes listed shares or fund units, government bonds and certificates traded in active markets. The price used is the price on the balance sheet date. The market is deemed active if it is possible to obtain external, observable prices, exchange rates, or interest rates, and these prices are actual and frequent market transactions.

Level 2: Financial instruments that are valued using information that is not listed prices, but where prices are directly or indirectly observable for assets and liabilities, including listed prices in inactive markets for identical assets and liabilities. The category includes bonds and interbank derivatives such as interest rate swaps, currency swaps and forward contracts listed on Reuters or Bloomberg, basis swaps between the currencies NOK, EUR, USD and GBP, and interest rate and currency derivatives with customers with insignificant credit spreads.

The value is based on recently observable market data in the form of a transaction in the instrument between informed, willing and independent parties. Alternatively, that the instrument was traded in an active market that is substantially like the relevant instrument.

Level 3: Financial instruments that are valued in manner other than on the basis of observable market data and in which credit margins constitute a material part of the basis for adjusting market value. Instruments in this category are valued using methods that are based on estimated cash flows, assessments of assets and liabilities in companies, models in which material parameters are not based on observable market data, or any industry standards.

When valuation techniques are used, the value is adjusted for credit and liquidity risk. The price of the risk for equivalent instruments is used as the basis for making the assessment.

The Bank uses a model that concerning the measurement of fair value, where an 'exit price' assessment is used. The valuation model takes account of credit premiums and changes in credit risk.

Instruments at the different levels

Loans to customers at fixed interest rates (Level 3)

The loans consist of fixed-rate loans in NOK. The loans are measured based on discounted cash flows, where the discount rate is calculated by a margin in excess of the interest rate curve. The margin is based on observable market prices

Mortgage loans to customers (Level 3)

The category includes mortgages to customers that can be sold to SpareBank 1 Boligkreditt, and valued at the agreed amount that is transferred to SpareBank 1 Boligkreditt.

Equities incl. equity instruments (Level 2)

Level 2 equities include hybrid Tier 1 instruments that are held for sale to customers. Hybrid Tier 1 instruments are measured based on observable interest rate curves and credit margins, as well as indicative prices in the market.

Equities (Level 3)

Equities in level 3 includes stake in companies where the bank owns a minor stake and does have observable market data. Fair value in level 3 is therefore determined from observable market data and estimated cash flows.

Bonds (Level 2)

The category mainly includes bonds in the Bank's liquidity portfolio that are considered less liquid (level 2 assets in calculations of the liquidity coverage ratio (LCR)). The bonds are measured based on observable interest rate curves and credit margins, as well as indicative prices in the market.

Financial derivatives (level 2)

The category includes interest rate derivatives, currency swaps, currency futures and commodity derivatives. Interest rate derivatives are measured based on relevant interest rate curves. Currency derivatives are measured based on the last available exchange rates. Commodity derivatives are measured based on observable market prices for underlying commodities.

Receivables (level 3)

The group has a receivable assessed at fair value (level 3) related to the sale of SNN Pensjonskasse. The claim is valued by an external valuer based on the agreed consideration in the sales agreement.

Note 26 Financial instruments at fair value

Parent bank

AMOUNTS IN NOK MILLION	VALUATION BASED ON LISTED PRICES IN AN ACTIVE MARKET LEVEL 1		VALUATION BASED ON OBSERVABLE MARKET DATA LEVEL 2	VALUATION BASED ON FACTORS OTHER THAN OBSERVABLE MARKET DATA LEVEL 3	TOTAL
Assets 31.12.24					
Shares	780		164	578	**1 522**
Bonds			19 233		**19 233**
Financial derivatives			1 532		**1 532**
Claim on SNN Pensjonskasse				255	**255**
Loans to customers with fixed rate				4 571	**4 571**
Mortgage loans				34 240	**34 240**
Total assets	780		20 929	39 644	**61 353**
Liabilities 31.12.24					
Derivatives at fair value			1 086		**1 086**
Total liabilities			1 086		**1 086**
Assets 31.12.23					
Shares	712		49	598	**1 359**
Bonds			18 189		**18 189**
Financial derivatives			1 422		**1 422**
Loans to customers with fixed rate				4 268	**4 268**
Loans to customers for sale				3 045	**3 045**
Total assets	712		19 660	7 911	**28 283**
Liabilities 31.12.23					
Derivatives at fair value			1 198		**1 198**
Total liabilities			1 198		**1 198**

Changes in value for financial instruments in level 3 parentbank:

ASSETS		CLAIM ON SNN PENSJONSKASSE	SHARES	LOANS TO CUSTOMERS WITH FIXED RATE	MORTGAGE LOANS TO CUSTOMERS
Booked value as at 01.01.			598	4 268	3 045
Net gains			–20		
Acquisitions		255			31 194
Disposals					
Overdue loans				303	
Booked value as at 31.12.		255	578	4 571	34 240

Note 26 Financial instruments at fair value

Group

AMOUNTS IN NOK MILLION	VALUATION BASED ON LISTED PRICES IN AN ACTIVE MARKET LEVEL 1		VALUATION BASED ON OBSERVABLE MARKET DATA LEVEL 2	VALUATION BASED ON FACTORS OTHER THAN OBSERVABLE MARKET DATA LEVEL 3	TOTAL
Assets 31.12.24					
Shares	780		164	584	**1 527**
Bonds			19 235		**19 235**
Claim to SNN Pensjonskasse				255	**255**
Financial derivatives			1 532		**1 532**
Loans to customers with fixed rate				4 571	**4 571**
Mortgage loans to customers				34 240	**34 240**
Total assets	780		20 931	39 650	
Liabilities 31.12.24					
Derivatives at fair value			1 086		**1 086**
Total liabilities			1 086		**1 086**
Assets 31.12.23					
Shares	712		54	598	**1 364**
Bonds			18 189		**18 189**
Financial derivatives			1 422		**1 422**
Loans to customers with fixed rate				4 268	**4 268**
Mortgage loans for sale				3 045	**3 045**
Total assets	712		19 665	7 911	**28 288**
Liabilities 31.12.23					
Derivatives at fair value			1 198		**1 198**
Total liabilities			1 198		**1 198**

Changes in value for financial instruments in level 3 parentbank:

ASSETS	LOAN TO CUSTOMERS FIXED RATE	CLAIM SNN PENSJONSKASSE	SHARES	MORTGAGE LOANS TO CUSTOMERS
Booked value as at 01.01.	4 268		598	3 045
Net gains			–14	
Acquisitions		255		31 194
Disposals	303			
Overdue loans				
Booked value as at 31.12.	4 571	255	584	34 240

SENSITIVITY ANALYSIS, LEVEL 3

GROUP	BOOKED VALUE AT 31.12.24	EFFECT OF ALTERNATIVE ASSUMPTIONS
Fixed-rate loans at fair value	4 571	–10,8
Loans held for sale to mortgage company	34 240	
Fordring SNN Pensjonskasse	255	
Shares at fair value	584	

Note 27 Fair value financial instruments at amortised cost

Financial instruments at amortised cost

As stated in note 2, the default classification for financial assets and liabilities in the Bank and the Group is "at amortised cost". The Group seeks to minimise income statement volatility by applying the same measurement policy to both assets and liabilities. Amortised cost entails measurement based on the originally agreed cash flows, adjusted for any loss in value. The calculations are made on the basis of the individual instrument's characteristics and values on the balance sheet date. Amortised cost will not always result in values that are consistent with the market's assessments of the same financial instruments. This may be due to actors such as differing perceptions of market conditions, risk factors and required rates of return. The table below provides an overview of estimated fair values for items that are stated in the financial statements at amortised cost. As stated in note 26, fair value is determined according to various methods within three levels.

Parent bank 31.12.24

AMOUNTS IN NOK MILLION	LEVEL 1	LEVEL 2	LEVEL 3	FAIR VALUE	BOOK VALUE
Assets					
Total loans and advances to credit institutions			10 070	10 070	10 070
Net loans and advances to customers			53 670	53 670	53 639
Shares					
Total financial assets			**63 740**	**63 740**	**63 709**
Liabilities					
Liabilities to credit institutions			763	763	763
Deposits from customers			87 727	87 727	87 727
Debt securities in issue		13 613		13 613	13 756
Subordinated loan capital		9 580		9 580	9 435
Total financial liabilities		**23 192**	**88 490**	**111 683**	**111 681**

Group 31.12.24

AMOUNTS IN NOK MILLION	LEVEL 1	LEVEL 2	LEVEL 3	FAIR VALUE	BOOK VALUE
Assets					
Total loans and advances to credit institutions			2 304	2 304	2 304
Net loans and advances to customers			63 048	63 048	63 017
Shares					
Total financial assets			**65 352**	**65 652**	**65 321**
Liabilities					
Liabilities to credit institutions			761	761	761
Deposits from customers			87 618	87 618	87 618
Debt securities in issue		13 613		13 613	13 756
Subordinated loan capital		9 580		9 580	9 435
Total financial liabilities		**23 192**	**88 379**	**111 571**	**111 570**

Note 27 Fair value financial instruments at amortised cost

Parent bank 31.12.23					
AMOUNTS IN NOK MILLION	LEVEL 1	LEVEL 2	LEVEL 3	FAIR VALUE	BOOK VALUE
Assets					
Total loans and advances to credit institutions			9 300	9 300	9 300
Net loans and advances to customers			81 738	81 738	81 773
Shares					
Total financial assets			91 038	91 038	91 073
Liabilities					
Liabilities to credit institutions			1 164	1 164	1 164
Deposits from customers			82 560	82 560	82 560
Debt securities in issue		13 822		13 822	13 970
Subordinated loan capital		8 224		8 224	8 367
Total financial liabilities		22 046	83 724	105 770	106 061

Group 31.12.23					
AMOUNTS IN NOK MILLION	LEVEL 1	LEVEL 2	LEVEL 3	FAIR VALUE	BOOK VALUE
Assets					
Total loans and advances to credit institutions			2 304	2 304	2 304
Net loans and advances to customers			90 685	90 685	90 720
Shares					
Total financial assets			92 989	92 989	93 024
Liabilities					
Liabilities to credit institutions			1 163	1 163	1 163
Deposits from customers			82 494	82 494	82 494
Debt securities in issue		13 822		13 822	13 970
Subordinated loan capital		8 224		8 224	8 367
Total financial liabilities		22 046	83 657	105 703	105 994

Note 28 Certificates and bonds

Bonds and certificates are measured at fair value with changes through profit-and-loss in accordance with IFRS 9

Certificates, bonds and other interest-bearing securities broken down by issuer sector				
PARENT BANK			GROUP	
31.12.23	**31.12.24**	AMOUNTS IN NOK MILLION	**31.12.24**	31.12.23
		Governments		
6 696	**7 622**	– nominal value	**7 622**	6 696
6 653	**7 622**	– fair value/booked value	**7 622**	6 653
		Other public issuer		
497	**560**	– nominal value	**560**	497
485	**555**	– fair value/booked value	**555**	485
		Financial institutions		
10 922	**10 913**	– nominal value	**10 913**	10 922
11 018	**11 024**	– fair value/booked value	**11 024**	11 020
		Non-financial institutions		
32	**32**	– nominal value	**32**	32
31	**32**	– fair value/book value	**32**	31
18 187	**19 233**	**Total certificates and bonds held for trading**	**19 235**	18 189

Note 29 Shares

SpareBank 1 Nord-Norge has only share portfolios measured at fair value. Trading portfolios are measured at exchange rates on the balance sheet date. The remaining shares are measured based on observable market data and estimated cash flows. All portfolios are measured at fair value with changes in value through profit or loss.

PARENT BANK			GROUP	
31.12.23	**31.12.24**	AMOUNTS IN NOK MILLION	**31.12.24**	31.12.23
		Fair value through profit and loss (FVPL):		
712	**787**	Trading assets	**787**	723
598	**686**	Shares designated as fair value	**692**	593
48	**49**	Hybrid Tier 1 Capital classified as equity positions	**49**	48
1 359	**1 522**	**Total shares and equities**	**1 528**	1 364

Breakdown of shares as at 31.12.24
Shares held for trading

AMOUNTS IN NOK THOUSANDS	NUMBER OF SHARES/UNITS	OUR EQUITY STAKE %	COST	MARKET VALUE	BOOKED VALUE
Shares at fair value					
SpareBank 1 Helgeland	5 397 325	19,99 %	528 398	779 913	**779 913**
Visa Pref Stock C (forv Visa Norge Holding1 AS)	1 175	<0,05 %	17 000	7 315	**7 315**
Total listed shares			545 398	787 228	**787 228**
Total shares held for trading			545 398	787 228	**787 228**

AMOUNTS IN NOK THOUSANDS	NUMBER OF SHARES/UNITS	OUR EQUITY STAKE %	COST	MARKET VALUE	BOOKED VALUE
Shares at fair value (FVPL)					
Sparebankmateriell AS	2 312	7,3 %	225	3 327	**3 327**
S.W.I.F.T	14		79	1 281	**1 281**
BN Bank	1 410 221	9,9 %	88 801	650 126	**650 126**
VN Norge AS	28 778 208		40 000	30 798	**30 798**
Various smaller shares			0	25	**25**
Total shares at fair value (FVPL)			29 105	685 557	**685 557**

Note 29 Shares

Hybrid capital classified to fair value

AMOUNTS IN NOK THOUSANDS	NUMBER OF SHARES/UNITS	OUR EQUITY STAKE %	COST	MARKET VALUE	BOOKED VALUE
Hybrid capital SNN Treasury			48 750	48 848	**48 848**
Sum hybrid capital			48 750	48 848	**48 848**
Parent bank's total shares and equity investments			723 253	1 521 633	**1 521 633**

Shares owned by SpareBank 1 Nord-Norge Portefølje as at 31.12.24

AMOUNTS IN NOK THOUSANDS	NUMBER OF SHARES/UNITS	OUR EQUITY STAKE %	COST	MARKET VALUE	BOOKED VALUE
Shares valued at fair value					
Lytix Biopharma	151 820		5 914	893	**893**
NorInnova Technology Transfer AS	613	3,7 %	2 900	2 756	**2 756**
Viking Venture III LP	37 025	0,9 %	1 822	1 822	**1 822**
Total shares owned by SNN Portefølje AS			10 636	5 471	**5 471**

The company also owns more shares which has been written down to NOK 0,-. Se the companys own annual report for further information.

Shares owned by SNN Regnskapshuset			66	66	**66**
Total shares and equity investments			733 955	1 527 170	**1 527 170**

Note 30 Investments in Group companies, associated companies and joint ventures

IFRS 11 regulates joint arrangements and classifies theminto two types – joint operations and joint ventures. SpareBank 1 Nord-Norge has made an assesment of its joint arrangements and classified them as joint ventures..

Associated companies are included in the consolidated financial statements in line with the equity method of accounting. The investment is initially recognised at acquisition cost in the balance sheet and subsequently adjusted for changes in the Bank's share of the net assets of the associated company. The Bank's share of n the consolidated financial statements, whereas the equity stake is recognised according to the cost method in the parent bank's financial statements, in the same manner as for subsidiaries.

Investments in Group companies Parent bank:

AMOUNTS IN NOK MILLION	31.12.24	31.12.23
Equity stakes in financial institutions	**1 195**	1 101
Equity stakes in other Group companies	**557**	493
Total investments in Group companies	**1 752**	1 594
Of which hybrid capital in financial institutions	**115**	115

Shares and equity stakes included in the Group accounts and shown in the Parent Bank's accounts according to the cost method of accounting

AMOUNTS IN NOK THOUSAND	ORG. NUMBER	SHARE CAPITAL	NUMBER OF SHARES	COST	SHARE OF EQUITY AND VOTING CAPITAL	BOOKED VALUE
Company Name						
SpareBank 1 Finans Nord-Norge AS, Tromsø	930 050 237	1 211 000	205 870	1 079 500	85 %	**1 079 500**
SpareBank 1 Nord-Norge Portefølje AS, Tromsø	935 491 533	1 100	1 000	43 000	100 %	**43 000**
EiendomsMegler 1 Nord-Norge AS, Tromsø	931 262 041	21 100	17 935	23 800	85 %	**25 212**
Fredrik Langes gate 20 AS, Tromsø	962 315 666	920	242	370 392	100 %	**370 392**
SpareBank 1 Regnskapshuset Nord-Norge AS, Tromsø	851 987 142	10 275	1 275	117 818	85 %	**117 818**
Investment (shares) shown in the Parent Bank`s accounts						**1 635 922**
Hybrid capital SpareBank 1 Finans Nord-Norge AS				115 000		**115 000**
Total investment shown in the Parent Bank`s accounts						**1 750 922**

Note 30 Investments in Group companies, associated companies and joint ventures

Shares and equity stakes included in th Group accounts and owned by subsidiaries

AMOUNTS IN NOK THOUSAND	ORG. NUMBER	SHARE CAPITAL	NUMBER OF SHARES	COST	SHARE OF EQUITY AND VOTING CAPITAL	BOOKED VALUE
Finansmodell AS, Tromsø. owned by SNN Portefølje AS	831 705 612	200	200 000	1 443	75 %	**1 443**
Total investment in Group companies shown in the subsidiaries accounts						**1 443**

Shares in subsidiaries are not quoted on the stock exchange.

Investments in joint ventures and associated companies

AMOUNTS IN NOK MILLION	31.12.24	31.12.23
Equity stakes in financial institutions	**2 287**	1 858
Equity stakes in other joint ventures	**2 397**	2 306
Total investments in joint ventures	**4 684**	4 164

Shares and equity stakes in joint ventures and assosiated companies, included in the Parent Bank's accounts according to the cost method of accounting

COMPANY NAMES	ORGANIZATION NUMBER	CLASSIFICATION	SHARE OF EQUITY AND VOTING CAPITAL	REGISTERED OFFICE
SpareBank 1 Gruppen AS	975 966 372	Joint venture	19,50 %	Oslo
SpareBank 1 Utvikling DA	986 401 598	Joint venture	18,00 %	Oslo
SpareBank 1 Betaling AS	919 116 749	Associated company	17,94 %	Oslo
SpareBank 1 Boligkreditt AS	988 738 387	Associated company	16,30 %	Stavanger
SpareBank 1 Næringskreditt AS	894 111 232	Associated company	0,58 %	Stavanger
Kredittbanken ASA	975 966 453	Associated company	13,18 %	Trondheim
SpareBank 1 Bank og Regnskap AS	917 143 501	Associated company	25,00 %	Trondheim
SpareBank 1 Mobilitet Holding AS	927 249 960	Associated company	30,66 %	Hamar
SpareBank 1 Gjeldsinformasjon AS	924 911 719	Associated company	13,83 %	Oslo
SpareBank 1 Forvaltning AS	925 239 690	Associated company	12,08 %	Oslo
SpareBank 1 Markets AS	992 999 101	Associated company	18,06 %	Trondheim

Intra-group balances relating to the Bank and the abovementioned companies: Reference is made to note 40.

Note 30 Investments in Group companies, associated companies and joint ventures

Group 2024 – Investments in associated companies and joint ventures

AMOUNTS IN NOK MILLION	TOTAL	SPAREBANK 1 GRUPPEN AS 19.5%	SPAREBANK 1 UTVIKLING DA 18.00%	KREDITT BANKEN ASA 13,18%	SPAREBANK 1 BOLIGKREDITT AS 16.30%	SPAREBANK 1 NÆRING-SKREDITT AS 0,58%	SPAREBANK 1 BETALING 17.94%	OTHER
As at 1 January	**4 858**	1 736	143	318	1 843	20	224	574
Acquisition/sale	**532**	0		106	438	–10		–2
Share of profit – IFRS	**930**	677	106	–9	88	1	–18	85
Share of result booked as administrative costs	**–104**		–104					
Share of OCI	**–97**	11		–1	–109		2	
Items incorporated directly in equity capital	**–15**	–23						8
Paid-out dividend	**–123**	0			–65	–2	4	–60
As at 31 December	**5 981**	2 401	145	414	2 195	9	212	605

Included in «other»: SpareBank 1 Bank og Regnskap AS, SpareBank 1 Gjeldsinformasjon AS, SpareBank 1 Mobilitet Holding AS, SpareBank 1 Forvaltning AS and SpareBank 1 Markets AS.

Group 2023 – Investments in associated companies and joint ventures

AMOUNTS IN NOK MILLION	TOTAL	SPAREBANK 1 GRUPPEN AS 19.5%	SPAREBANK 1 UTVIKLING DA 18.00%	SPAREBANK 1 KREDITT AS 16.73%	SPAREBANK 1 BOLIGKREDITT AS 15.70%	SPAREBANK 1 NÆRING-SKREDITT AS 1.05%	SPAREBANK 1 BETALING 17.94%	OTHER
As at 1 January	**4 861**	2 047	137	301	1 852	52	224	248
Acquisition/sale	**658**	218		33	13	–33	36	391
Share of profit – IFRS	**44**	–41	106	–12	65	2	–31	–45
Share of result booked as administrative costs	**–100**		–100					
Share of OCI	**–86**	6		0	–87		–5	
Items incorporated directly in equity capital	**7**	11		–4				
Paid-out dividend	**–526**	–505				–1		––20
As at 31 December	**4 858**	1 736	143	318	1 843	20	224	574

Included in «other»: SpareBank 1 Bank og Regnskap AS, SpareBank 1 Gjeldsinformasjon AS, SpareBank 1 Mobilitet Holding AS, SpareBank 1 Forvaltning AS og SpareBank 1 Markets AS.

Note 30 Investments in Group companies, associated companies and joint ventures

The Group's equity stakes in associated companies and joint ventures

The tables below contain company or group accounting figures one hundred percent share

NAME	ASSETS	LIABILITIES	INCOME	COSTS	PROFIT/ LOSS
2024					
SpareBank 1 Gruppen AS (group)	166 931	144 915	5 769	3 507	2 262
SpareBank 1 Betaling AS	1 264	0	0	102	–102
SpareBank 1 Utvikling DA	1 185	351	2 192	2 182	10
SpareBank 1 Boligkreditt AS	357 385	342 603	846	232	614
SpareBank 1 Næringskreditt AS	10 515	8 387	133	35	98
Kredittbanken ASA (SB1 Kreditt)	12 177	9 598	594	648	–54
SpareBank 1 Bank og Regnskap AS	169	0	46	1	45
SpareBank 1 Mobilitet Holding AS	2	0	0	0	0
SpareBank 1 Gjeldsinformasjon AS	10	1	0	0	0
SpareBank 1 Forvaltning AS	1 693	430	1 033	786	247
SpareBank 1 Markets AS	3 002	1 111	1 168	944	224
2023					
SpareBank 1 Gruppen AS (group)	132 113	119 812	2 310	2 064	246
SpareBank 1 Betaling AS	1 256	0	0	174	–174
SpareBank 1 Utvikling DA	1 188	365	1 953	1 919	34
SpareBank 1 Boligkreditt AS	320 465	307 788	680	201	479
SpareBank 1 Næringskreditt AS	10 634	8 547	111	54	57
SpareBank 1 Kreditt AS	9 746	7 903	493	562	–69
SpareBank 1 Bank og Regnskap AS	176	0	6	0	6
SpareBank 1 Mobilitet Holding AS	4	0	0	266	–266
SpareBank 1 Gjeldsinformasjon AS	9	1	0	2 039	–2 039
SpareBank 1 Forvaltning AS	1 718	570	849	681	168
SpareBank 1 Markets AS	2 097	1 206	853	698	155

Note 31 Property, plant, and equipment

Property, plant, and equipment are initially recognized at acquisition cost and subsequently depreciated linearly over their expected useful life. When determining the depreciation schedule, individual assets are split into components with varying lifespans, taking estimated residual value into account. Items of PPE that are individually insignificant, such as PCs and other office equipment, are assessed collectively for residual values, useful life, and impairment, rather than individually. Under IFRS 16, properties are considered to have an estimated acquisition cost equivalent to the revalued amount at the time of revaluation. PPE subject to depreciation undergo impairment testing in accordance with IAS 36 when circumstances indicate the need for it.

PARENT BANK				GROUP		
BUILDINGS AND OTHER PROPERTY	MACHINERY, FIXTURES, FITTINGS, AND VEHICLES	TOTAL	AMOUNTS IN NOK MILLION	TOTAL	BUILDINGS AND OTHER PROPERTY	MACHINERY, FIXTURES, FITTINGS, AND VEHICLES
27	323	**350**	Cost of acquisition or adjusted value as of 01.01.24 1)	**825**	342	483
	27	**27**	Additions	**50**	2	49
	–113	**–113**	Disposals	**–113**		–113
27	237	**264**	**Cost of acquisition or adjusted value as of 31.12.24**	**756**	343	419
–12	–238	**–250**	Accumulated depreciation and write-downs as of 01.01.24	**–387**	–42	–345
–2	–21	**–24**	Current period’s depreciation	**–45**	–9	–36
			Current period’s impairment			
	112	**112**	Reversed accumulated depreciation related to disposals	**112**		112
–15	–147	**–161**	**Accumulated depreciation and impairment in value as of 31.12.24**	**–320**	–52	–268
		296	**Right to use asset 2)**	**369**		
12	90	**398**	**Book value as of 31.12.24**	**811**	292	150
29	528	**557**	Cost of acquisition or adjusted value as of 01.01.23 1)	**1 013**	344	669
0	26	**26**	Additions	**45**	1	44
–2	–231	**–233**	Disposals	**–233**	–2	–231
27	323	**350**	**Cost of acquisition or adjusted value as of 31.12.23**	**825**	342	483
–13	–442	**–454**	Accumulated depreciation and write-downs as of 01.01.23	**–570**	–36	–534
–2	–27	**–29**	Current period’s depreciation	**–50**	–9	–41
0	0	**0**	Current period’s impairment	**0**	0	0
2	231	**233**	Reversed accumulated depreciation related to disposals	**233**	2	231
–12	–238	**–250**	**Accumulated depreciation and impairment in value as of 31.12.23**	**–387**	–42	–346
		303	**Right to use asset 2)**	**374**		
14	85	**402**	**Book value as of 31.12.23**	**811**	300	137
1–5 %	10–33 %		Depreciation rates		1,5 %	10–33 %
0 %	0 %		Dwelling units, building plots and sites, works of art		0 %	0 %

1) Due to a system correction, the opening balance have been adjusted on Group level.
2) Further information regarding leases is found in note 32.

Provision of collateralised assets as security

The Bank has not provided collateral security or accepted any rights of use limitations regarding fixed tangible assets.

The gross value of fully depreciated assets still in use

The gross value of fixed tangible assets which are fully depreciated and still in use was 67 NOK million as of 31.12.24 (125 NOK million as of 31.12.23).

Liabilities related to property, plant and equipment

The Group has no liabilities in regards to acquiring fixed assets as of 31.12.24.
See note 37 concerning other liabilities for further information.

Investment property group

The Bank has no assets defined as investment properties as of 31.12.24.

Note 32 Leases

The group processes lease agreements in accordance with IFRS 16. On the lease commencement date, the group recognizes an obligation to pay rent and an asset representing the right to use the underlying asset during the lease term (the right of use). The group determines the lease obligations and rights at the present value of the remaining lease payments, discounted using the group’s marginal borrowing rate.

Interest costs on the lease liability are recognised as costs on an ongoing basis and the right-of-use asset is depreciated on a straight-line basis over the term of the lease.

The Group’s leased assets mainly include branches and naturally associated premises. Many of the contracts include the right to an extension that can be exercised during the term of the contract. The Group assesses, upon entering into a contract and thereafter continually, whether the right to the extension will, with reasonable certainty, be exercised.

The leases have different terms and option structures.

PARENT BANK			GROUP	
31.12.23	31.12.24	AMOUNTS IN NOK MILLION	31.12.24	31.12.23
		Right to use asset		
303	**303**	Carrying amount 01.01.	**374**	386
0	**12**	Additions	**59**	6
0	**–3**	–Derecognition	**–3**	0
31	**19**	Other changes	**–22**	21
334	**331**	**Carrying amount at the end of the period**	**408**	413
31	**35**	Depreciation in the period	**39**	39
303	**296**	**Carrying amount of right to use asset at the end of the period**	**369**	374
		Lease liability		
312	**313**	Carrying amount 01.01.	**388**	399
0	**12**	Additions in the period	**59**	6
–36	**–40**	Lease payments in the period – installments	**–46**	–46
7	**7**	Interest	**10**	9
30	**16**	Other changes	**–27**	21
313	**308**	**Lease liability at the end of the period**	**384**	388
		Profit and loss		
31	**35**	Depreciation	**39**	39
7	**7**	Interest	**10**	9
38	**42**	**Total lease expense**	**49**	48
		Undiscounted lease liabilities and maturity of cash outflows		
38	**39**	Less than 1 year	**45**	44
36	**33**	1–2 years	**44**	41
31	**32**	2–3 years	**43**	40
31	**31**	3–4 years	**40**	39
30	**30**	4–5 years	**35**	38
189	**186**	More than 5 years	**246**	242
354	**351**	**Total**	**453**	444

Note 33 Intangible assets

Intangible assets primarily consist of goodwill. Intangible assets are recognized when the criteria for recognition are met. Goodwill arises as the difference between the fair value of consideration paid for acquiring a business and the fair value of identifiable assets and liabilities. Goodwill is not amortized, but it undergoes an annual impairment test to assess any potential decline in value, in accordance with IAS 36. Impairments occur when the carrying amount of goodwill exceeds its recoverable amount. Impairments are recognized in the income statement and are not reversed.

	GROUP	
AMOUNTS IN NOK MILLION	**31.12.24**	31.12.23
Goodwill	**186**	185
Other intangible assets	**7**	8
Total intangible assets	**193**	193

Goodwill primarily applies to the acquisition or merger of accounting firms within SpareBank 1 Regnskapshuset Nord-Norge AS.

Note 34 Other assets

PARENT BANK		AMOUNTS IN NOK MILLION	GROUP	
31.12.23	**31.12.24**		**31.12.24**	31.12.23
75	**75**	Capital contribution to the SpareBank 1 Nord-Norge Pension Fund	**75**	75
79	**237**	Receivable at fair value from Sparebank 1 Nord-Norges Pensjonskasse	**237**	79
23	**52**	Other debtors	**65**	60
170	**136**	Prepaid expenses	**275**	212
6	**2**	Internal accounts	**2**	6
13	**18**	Client account – property brokerage	**89**	61
72		Overtaken assets for sale		
66	**13**	Other assets	**25**	70
504	**533**	**Total other assets**	**768**	563

Note 35 Deposits from customers

SpareBank 1 Nord-Norge classifies deposits from customers to amortised cost.
For more information, please see note 19 regarding interest cost for deposits.

PARENT BANK				Deposits from financial institutions	GROUP			
31.12.23		31.12.24			31.12.24		31.12.23	
PROPORTION	DEPOSITS	**PROPORTION**	**DEPOSITS**	AMOUNTS IN NOK MILLION	**PROPORTION**	**DEPOSITS**	PROPORTION	DEPOSITS
15 %	175	**40 %**	**308**	Deposits without agreed maturity or notice period	**40 %**	**308**	15 %	175
85 %	990	**60 %**	**455**	Deposits with agreed maturity or notice period	**60 %**	**453**	85 %	989
100 %	1 165	**100 %**	**763**	**Total deposits from financial institutions**	**100 %**	**761**	100 %	1 164
	1,88 %		**2,26 %**	Average interest rate 1)		**2,26 %**		1,88 %
				Deposits from customers				
90 %	74 566	**90 %**	**79 198**	Deposits without agreed maturity or notice period	**90 %**	**79 096**	90 %	74 514
10 %	7 994	**10 %**	**8 529**	Deposits with agreed maturity or notice period	**10 %**	**8 522**	10 %	7 981
100 %	82 560	**100 %**	**87 727**	**Total deposits from customers**	**100 %**	**87 618**	100 %	82 495
	2,28 %		**2,95 %**	Average interest rate 1)		**2,95 %**		2,28 %
	83 725		**88 490**	**Total deposits**		**88 379**		**83 659**

1) *The average interest rate is calculated as the sum of annual interests divided by the average volume.*

PARENT BANK				Deposits from customers broken down by NACE industry code	GROUP			
31.12.23		31.12.24			31.12.24		31.12.23	
PROPORTION	DEPOSITS	PROPORTION	DEPOSITS	AMOUNTS IN NOK MILLION	PROPORTION	DEPOSITS	PROPORTION	DEPOSITS
6 %	5 338	**6 %**	**5 343**	Agriculture, forestry and fishing	**6 %**	**5 343**	6 %	5 338
0 %	103	**0 %**	**67**	Mining and quarrying	**0 %**	**67**	0 %	103
1 %	1 114	**1 %**	**1 139**	Manufacturing	**1 %**	**1 139**	1 %	1 114
1 %	660	**1 %**	**500**	Electricity, gas, steam and air conditioning supply	**1 %**	**500**	1 %	660
0 %	276	**0 %**	**305**	Water supply, sewerage, waste management and remediation activities	**0 %**	**305**	0 %	276
2 %	1 986	**3 %**	**2 239**	Construction	**3 %**	**2 239**	2 %	1 986
3 %	2 457	**3 %**	**2 254**	Wholesale and retail trade, repair of motor vehicles and motorcycles	**3 %**	**2 254**	3 %	2 457
2 %	1 444	**2 %**	**1 839**	Transporting and storage	**2 %**	**1 839**	2 %	1 444
1 %	541	**1 %**	**715**	Accommodation and food service activities	**1 %**	**715**	1 %	541
1 %	658	**1 %**	**526**	Information and communication	**1 %**	**526**	1 %	658
4 %	2 922	**7 %**	**6 378**	Financial and insurance activities	**7 %**	**6 378**	4 %	2 922
5 %	3 971	**4 %**	**3 589**	Real estate activities	**4 %**	**3 589**	5 %	3 971
2 %	1 910	**2 %**	**1 718**	Professional, scientific and technical activities	**2 %**	**1 718**	2 %	1 910
2 %	1 477	**2 %**	**1 767**	Administrative and support service activities	**2 %**	**1 767**	2 %	1 477
9 %	7 718	**9 %**	**8 013**	Public administration and defence; compulsory social security	**9 %**	**8 013**	9 %	7 718
0 %	338	**0 %**	**380**	Education	**0 %**	**380**	0 %	338
1 %	993	**1 %**	**1 275**	Human health and social work activities	**1 %**	**1 275**	1 %	993
1 %	1 152	**2 %**	**1 488**	Arts, entertainment and recreation	**2 %**	**1 488**	1 %	1 152
5 %	4 034	**2 %**	**2 142**	Other services activities	**2 %**	**2 033**	5 %	3 969
0 %	20	**0 %**	**27**	Activities of households as employers; undifferentiated goods - and services - producing activities of households for own use	**0 %**	**27**	0 %	20
0 %	10	**0 %**	**3**	Activities of extraterritorial organisations and bodies	**0 %**	**3**	0 %	10
47 %	39 122	**47 %**	**41 707**	Total public market	**47 %**	**41 598**	47 %	39 057
53 %	43 438	**53 %**	**46 020**	Retail market	**53 %**	**46 020**	53 %	43 438
100 %	82 560	**100 %**	**87 727**	**Total deposits from customers**	**100 %**	**87 618**	100 %	82 495
				Deposits from customers broken down by geographical area				
59 %	48 912	**60 %**	**52 841**	Troms og Finnmark, incl. Svalbard	**60 %**	**52 732**	59 %	48 847
34 %	27 829	**33 %**	**28 538**	Nordland	**33 %**	**28 538**	34 %	27 829
6 %	4 760	**6 %**	**5 225**	Other regions	**1 %**	**5 225**	6 %	4 760
1 %	1 059	**1 %**	**1 123**	International	**0 %**	**1 123**	1 %	1 059
100 %	**82 560**	**0 %**	**0**	**Total deposits from customers broken down by geographical areas**	**0 %**	**0**	**100 %**	**82 495**

Note 36 Debt securities in issue

SpareBank 1 Nord-Norge's debt is established through securities with both floating and fixed interest rates. For floating-rate borrowings, the valuation is based on amortized cost. However, for fixed-rate borrowings, the valuation also considers fair value hedging. Fixed-rate borrowings are secured using interest rate swap agreements to mitigate market and interest rate risks.
The loan's valuation is adjusted in accordance with the fair value of the interest rate hedge. However, the fair value of the interest rate hedge does not take credit risk into account. The group utilizes the IAS 39 framework for assessing interest rate hedges.

PARENT BANK		AMOUNTS IN NOK MILLION	GROUP	
31.12.23	31.12.24		31.12.24	31.12.23
6 197	**8 112**	Fixed-rate bonds	**8 112**	6 197
7 773	**5 644**	Floating-rate bonds	**5 644**	7 773
13 970	**13 756**	**Total debt securities in issue**	**13 756**	13 970
3,22 %	**3,92 %**	Average interest rate for bond debt 1)	**3,92 %**	3,22 %
		Bond debt broken down by maturities		
4 189		2024		4 189
4 286	**4 458**	2025	**4 458**	4 286
2 448	**2 469**	2026	**2 469**	2 448
1 436	**1 467**	2027	**1 467**	1 436
1 353	**5 260**	2028 or later	**5 260**	1 353
258	**102**	Market value change of fixed-rate bonds	**102**	258
		Own bonds		
13 970	**13 756**	**Bond debt and other long-term borrowings**	**13 756**	13 970
		Debt broken down by the most important foreign currencies		
8 768	**7 568**	NOK	**7 568**	8 768
1 638	**1 616**	CHF	**1 616**	1 638
		USD		
3 564	**4 572**	EUR	**4 572**	3 564
13 970	**13 756**	**Total debt broken down by major currencies**	**13 756**	13 970

1) Average interest is calculated on the basis of actual interest cost for the year, including any interest rate- and currency swaps, as a percentage of the average securities portfolio.

Changes in securities issued

PARENT BANK AND GROUP	BALANCE	ISSUED	MATURED/ REDEEMED	EXCHANGERATE MOVEMENTS	OTHER ADJUSTMENTS 2)	BALANCE
AMOUNTS IN NOK MILLION	31.12.23	2024	2024	2024	2024	31.12.24
Certificates and other short-term borrowings						
Senior bonds	13 970	3 709	−4 374	346	105	13 756
Total	**13 970**	**3 709**	**−4 374**	**346**	**105**	**13 756**

2) Other changes consist of accrued interest adjustments and fair value hedge accounting.

Note 37 Other liabilities

PARENT BANK		AMOUNTS IN NOK MILLION	GROUP	
31.12.23	31.12.24		31.12.24	31.12.23
2 837	**2 955**	Other liabilities	**2 904**	3 078
157	**182**	Accrued costs	**553**	564
61	**34**	Provision for incurred costs / obligations	**34**	61
3 055	**3 171**	**Total other liabilities**	**3 491**	3 703
		Other liabilities:		
313	**313**	Lease liability under IFRS 16 (see note 32)	**388**	399
682	**641**	Accrued tax last year	**703**	736
21	**14**	Tax deductions	**24**	35
636	**599**	Creditors	**640**	666
1 067	**1 060**	Agreed payments from Donations Fund	**1 060**	1 067
118	**328**	Miscellaneous liabilities	**89**	175
2 837	**2 955**	**Total other liabilities**	**2 904**	3 078
		Incurred costs / prepaid income:		
83	**99**	Incurred costs 1)	**99**	106
74	**83**	Incurred personnel costs	**83**	126
		Unearned income related to leasing agreements 1)	**371**	332
157	**182**	**Total incurred costs / prepaid income**	**553**	564
		Provision of accrued expenses / obligations:		
61	**34**	Off balance sheet loss provisions under IFRS 9 2)	**34**	61
61	**34**	**Total provision of accrued expenses / obligations**	**34**	61

1) Prepaid lease payments on leasing contracts are recorded on the liability side of the balance sheet and recognized as income over the contract's duration in line with depreciation.
2) Impairment of unused framework loans and guarantees is classified as debt according to IFRS 9. Also see note 13.

Ongoing lawsuits
As of 31.12.24, the Bank is not involved in legal disputes that entail a litigation risk of significance to the Bank's operations.

Note 38 Subordinated loan capital and debt

Subordinated loan capital

The maturity and interest rates for subordinated loan capital are shown in the table below. All of the amounts are measured at amortised cost.

Maturity structure

PARENT BANK		AMOUNTS IN NOK MILLION	GROUP	
31.12.23	31.12.24		31.12.24	31.12.23
		Subordinated capital with definite maturity		
200		2029 3m NIBOR + 1.40 % (Call opsjon 2024)		200
500	**500**	2032 3m NIBOR + 0.90 % (Call opsjon 2027)	**500**	500
400	**400**	2033 3m NIBOR + 1.80 % (Call opsjon 2028)	**400**	400
400	**400**	2033 3m NIBOR + 2.20 % (Call opsjon 2028)	**400**	400
400	**400**	2034 3m NIBOR + 2.10 % (Call opsjon 2029)	**400**	400
	250	2034 3m NIBOR + 1.87 % (Call opsjon 2029)	**250**	
12	**14**	Accrued interest	**14**	12
1 912	**1 964**	**Total subordinated capital with definite maturity**	**1 964**	1 912
5.51 %	**6.52 %**	Average interest subordinated capital	**6.52 %**	5.51 %

Non-preferred debt

Senior non-preferred debt is a new debt class, issued to fulfill MREL requirements (Minimum Required Eligible Liabilities).

The Norwegian FCA, Finanstilsynet, assesses individual institutions in connection with annual work on crisis management plans for banks.

The crisis management plan specifies the crisis measures that can be implemented when the conditions for crisis management are met.

A central element of the new crisis management regulations is that capital instruments and debt can be written down and/or converted into equity (bail-in).

The Financial Institutions Act requires that banks always meet the MREL, ensuring that institutions have sufficient eligible capital and convertible debt to be crisis-managed without the use of public funds.

PARENT BANK		AMOUNTS IN NOK MILLION	GROUP	
31.12.23	31.12.24		31.12.24	31.12.23
6 394	**7 402**	Senior non-preferred debt	**7 402**	6 394
61	**68**	Accrued interest	**68**	61
3.41 %	**3.99 %**	Average interest non-preferred debt	**3.99 %**	3.41 %
8 367	**9 435**	**Total subordinated capital and non-preferred debt**	**9 435**	8 367

Changes in subordinated capital and senior non-preferred debt

PARENT BANK AND GROUP	BALANCE	ISSUED	MATURED/ REDEEMED	EXCHANGE-RATE MOVEMENTS	OTHER AD-JUSTMENTS 1)	BALANCE
AMOUNTS IN NOK MILLION	31.12.23	2024	2024	2024	2024	31.12.24
Subordinated loan capital	1 912	250	–200	5	–3	1 964
Senior non-preferred debt	6 455	999	–111	73	53	7 471
Total	**8 367**	**1 249**	**–311**	**78**	**50**	**9 435**

1) Other changes consist of accrued interest related to subordinated debt and accrued interest and fair value adjustments (hedge accounting) related to senior non-preferred debt.

Note 39 Business acquisitions/mergers

No significant acquisitions or mergers have been carried out in the group during the financial years

Note 40 Related parties

PARENT BANK	SUBSIDIARIES	JOINT VENTURES/ASSOCIATED COMPANIES
SpareBank 1 Nord-Norge	SpareBank 1 Finans Nord-Norge AS	SpareBank 1 Gruppen AS
	EiendomsMegler 1 Nord-Norge AS	SpareBank 1 Boligkreditt AS
	SpareBank 1 Nord-Norge Portefølje AS	SpareBank 1 Utvikling DA
	SpareBank 1 Regnskapshuset Nord-Norge AS	SpareBank 1 Næringskreditt AS
	Fredrik Langes Gate 20 AS	SpareBank 1 Betaling AS
	Rødbanken Holding AS 1)	Kredittbanken ASA
	Finansmodell 1 AS	SpareBank 1 Bank og Regnskap AS
		SpareBank 1 Gjeldsinformasjon AS
		SpareBank 1 Mobilitet Holding AS
		SpareBank 1 Forvaltning AS
		SpareBank 1 Markets AS

Share of equity is specified in note 30.
1) Ideal organisations are not consolidated in the group accounts.

Transactions with subsidiaries

AMOUNTS IN NOK MILLION	2024	2023
Income items - Parent Bank:		
Interest and similar income from loans and claims from subsidiaries	**431**	355
Deposit interest income from subsidiaries	**26**	23
Share dividend	**157**	167
Accrued commissions from lien loans	**10**	10
Other fees and commisions	**0**	0
Refunded operating costs (adm services, IT etc)	**8**	7
Refunded rental cost (posted in the balance sheet, under IFRS 16)	**19**	16
Balance sheet items - Parent Bank:		
Loans	**7 700**	6 879
Subordinated loan capital	**166**	166
Hybrid Tier 1 Capital bonds	**115**	115
Deposits	**109**	66
Other receivables	**0**	0

As at 31.12.24, lien-based loans and leasing arranged for SpareBank 1 Finans Nord-Norge AS totalled NOK 6 175 million.

Note 40 Related parties

Transactions with joint ventures/associated companies

AMOUNTS IN NOK MILLION	2024	2023
Income items - Parent Bank:		
Interest and similar income recieved from loans and claims from joint ventures	**167**	155
Deposit interest income from joint ventures	**0**	10
Share dividends	**113**	434
Balance sheet items - Parent Bank:		
Loans and advances to joint ventures	**1 686**	191
Deposits from and liabilities to joint ventures	**298**	329
Bonds	**122**	122
Guarantees	**4**	4

Being a participant in the SpareBank 1-alliance, several transactions between the Parent Bank and joint ventures are carried out. All transactions entered into are completed on commercial terms as a part of ordinary business and at market prices.

The most important transactions are as follows:

AMOUNTS IN NOK MILLION	2024	2023
a) Purchase of management- and information technology, and development services from SpareBank 1 Utvikling DA	**189**	156
b) Commisions from sale of insurance- and savings products with an insurance element for SpareBank 1 Gruppen AS	**241**	238
c) Loans sold to SpareBank 1 Boligkreditt AS (as at 31.12)	**47 840**	44 521
Accrued commission from SpareBank 1 Boligkreditt AS	**178**	114
Receivables SpareBank 1 Boligkreditt AS (as at 31.12)	**0**	0
d) Loans sold to SpareBank 1 Næringskreditt AS (as at 31.12)	**77**	128
Accrued commision from SpareBank 1 Næringskreditt AS	**1**	2

Note 41 Equity Certificates (EC) and ownership structure

According to the statutes §2-2 the Bank's EC-capital amounts to NOK 1,807 164,288 made up of 100,398 016 certificates, each of a nominal value of NOK 18. The voting rights associated with an equity certificate are held by the person who is registered as owner in the Norwegian Central Securities Depository (VPS).

The Supervisory Board can decide to issued equity certificates that are negotiable and entitle the holder to dividend under the Act of 10.06.88 No. 40 relating to financial services and financial institutions (Financial Institutions Act).
Equity certificate holders must be registered with the Norwegian Central Securities Depository (VPS).

As of 31.12.24, the Bank had 11 074 EC holders (11 452 as of 31.12.22).

Change in the Bank's EC capital and total certificates

YEAR	CHANGE	CHANGE IN EC CAPITAL	TOTAL EC CAPITAL	TOTAL NUMBER OF CERTIFICATES
2000	Issue earmarked for staff	10 453 101	659 701 800	6 597 018
2001			659 701 800	6 597 018
2002			659 701 800	6 597 018
2003			659 701 800	6 597 018
2004			659 701 800	6 597 018
2005	Bonds issue	131 940 500	791 642 200	7 916 422
2005	EC splut		791 642 200	15 832 844
2006			791 642 200	15 832 844
2007	Dividend issue	49 055 400	840 697 600	16 813 952
2008	Dividend issue	54 906 050	895 603 650	17 912 073
2009			895 603 650	17 912 073
2010			895 603 650	17 912 073
2011	EC split and issues	759 621 025	1 655 224 675	66 208 987
2012			1 655 224 675	66 208 987
2013	Rights issue and private placement for employees	750 029 552	1 807 164 288	100 398 016
2014			1 807 164 288	100 398 016
2015			1 807 164 288	100 398 016
2016			1 807 164 288	100 398 016
2017			1 807 164 288	100 398 016
2018			1 807 164 288	100 398 016
2019			1 807 164 288	100 398 016
2020			1 807 164 288	100 398 016
2021			1 807 164 288	100 398 016
2022			1 807 164 288	100 398 016
2023			1 807 164 288	100 398 016
2024			1 807 164 288	100 398 016

Note 41 Equity Certificates (EC) and ownership structure

The 20 largest EC holders

EQUITY CERTIFICTE HOLDERS	NUMBER OF ECS 31.12.24	SHARE 31.12.24	CHANGE IN NUMBER OF ECS 2024
Skandinavia Enskilda Banken AB	5.256.732	5.24 %	4 821 909
Pareto Aksje Norge Verdipapirfond	4.795.642	4.78 %	–175 047
Verdipapirfond Eika Egenkapitalbevis	4.299.045	4.28 %	629 852
Geveran Trading Company Ltd.	3.851.277	3.84 %	326 249
Kommunal Landspensjonskasse Gjensidige	3.402.369	3.39 %	629 947
MP Pensjonskasse	2.409.322	2.40 %	0
Brown Brothers Harriman & Co	2.352.571	2.34 %	–75 385
Forsvarets Personellservice	1.851.730	1.84 %	99 100
State Street Bank and Trust Company	1.562.432	1.56 %	–6 512
State Street Bank and Trust Company	1.468.574	1.46 %	137 365
Spesialfondet Borea Utbytte	1.461.803	1.46 %	636 344
Sparebankstiftelsen SpareBank 1 Nord-Norge	1.411.606	1.41 %	0
The Northern Trust Company	1.221.696	1.22%	–139 468
Brown Brothers Harriman & Co	1.140.900	1.14 %	0
Verdipapirfondet SpareBank 1 Utbytte	1.052.761	1.05 %	217 761
J.P. Morgan SE	1.032.862	1.03 %	207 225
State Street Bank and Trust Company	951.050	0.95 %	27 829
State Street Bank and Trust Company	879.825	0.88 %	14 064
Landkreditt Utbytte	821.274	0.82 %	0
Brown Brothers Harriman & Co	735.389	0.73 %	0
20 largest EC holders	**41.958.860**	**41.79 %**	**7 351 233**
Other EC holders	**58 439 156**	**58.21 %**	**-7 351 233**
ECs issued	**100 398 016**	**100 %**	**0**

Note 41 Equity Certificates (EC) and ownership structure

Equity and EC ratio

The result for the financial year is distributed proportionally between the owner groupings according to their relative share of the bank's equity

PARENT BANK			GROUP	
31.12.23	**31.12.24**		**31.12.24**	31.12.23
1 807	**1 807**	EC capital	**1 807**	1 807
843	**843**	Premium Fund	**843**	843
3 563	**4 001**	Dividend Equalisation Fund	**4 001**	3 563
703	**878**	Set aside EC dividend, not decided	**878**	703
–28	**–42**	EC owner's share of other equity	**637**	362
6 888	**7 487**	**EC owner's share of equity**	**8 166**	7 278
46,36 %	**46,36 %**	EC owner's percentage of equity	**46,36 %**	46,36 %
7 186	**7 693**	Saving Bank's primary capital	**7 693**	7 186
813	**1 016**	Set aside society dividend, not decided	**1 016**	813
–32	**–47**	Society's share of other equity	**737**	418
7 967	**8 662**	**Society's share of equity**	**9 446**	8 417
53,64 %	**53,64 %**	Society's percentage of equity	**53,64 %**	53,64 %
		Non-controlling interests	**277**	245
1 250	**1 450**	Hybrid Capital	**1 450**	1 250
16 105	**17 599**	**Total equity**	**19 339**	17 190

Reconciliation Balance Sheet		
Total equity, excluding hybrid capital	**14 255**	13 339
Hybrid capital	**1 450**	1 250
Set aside for dividens payment	**878**	703
Set aside for donations	**1 016**	813
Total equity, Parent Bank	**17 599**	16 105

Note 41 Equity Certificates (EC) and ownership structure

Result per EC				
PARENT BANK			GROUP	
2023	**2024**		**2024**	2023
3 049	**2 899**	Result for the year	**3 663**	2 548
–60	**–100**	Non-controlling interests` share*	**–100**	–60
		Net interests hybrid capital	**–33**	–27
2 989	**2 799**	**Adjusted resultat for the year**	**3 530**	2 461
1 386	**1 298**	EC-holders share of result for the year (46.36%)	**1 637**	1 141
13,80	**12,92**	**Result per EC**	**16,30**	11,36
3 049	**2 906**	Total comprehensive income	**3 572**	2 462
		Non-controlling interests` share	**–33**	–27
–60	**–100**	Net interests hybrid capital*	**–100**	–60
2 989	**2 806**	**Adjusted total comprehensive income**	**3 439**	2 375
1 386	**1 301**	EC-holders' share of result for the year (46.36%)	**1 594**	1 101
13.80	**12.96**	**Total comprehensive income per EC**	**15.88**	10.97

*Interest on tier 1 capital instruments that are classified as equity was recognised directly against equity in the amount of NOK 100 (60) million.

Note 42 Profit distribution

AMOUNTS IN NOK MILLION	2024	2023
Result for the year (group)	**3 663**	2 548
Non-controlling interests` share	**33**	*27*
Result from subsidiaries	**–219**	–165
Dividends from subsidiaries	**167**	176
Result from associated companies/joint ventures	**–826**	56
Dividends/gains from associated companies/joint ventures	**114**	434
Result for the year (parent bank)	**2 899**	3 049
Interest hybrid capital	**–100**	–60
Result for the year distributable (parent bank)	**2 799**	2 989
Distribution		
Cash dividend to EC holders	**878**	703
Dividend Equalization Fund	**420**	682
Donations	**1 016**	813
Saving Bank`s Fund	**485**	790
Result for the year distributed	**2 799**	2 989
To EC holders (amount)	**1 298**	1 413
To EC holders (per cent)	**46.36 %**	46.36 %
To community owned capital (amount)	**1 501**	1 635
To community owned capital (per cent)	**53.64 %**	53.64 %
Payout rate for the distributable result for the Parent Bank	**67.7 %**	50.7 %
Payout rate for the distributable result for the Group	**53.6 %**	61.6 %
Proposed dividend per equity certificate	**8.75**	7.00
Paid out dividend per equity certificate	**7.00**	8.20

Dividends will be distributed to registered equity certificate holders as of 8 April 2025.
The Bank`s equity certificates will be traded ex dividend as of 9 April 2025.
Dividends will be paid out on 16 April 2025.
(EC = Equity Certificates)

Perpetual hybrid Tier 1

Six tier 1 capital instruments issued by the Bank are not covered by the IFRS regulations' definition of debt and are therefore classified as equity. Based on this, accrued interest on the hybrid tier 1 capital has not been recognised as a cost in the income statement but has been charged directly against equity.

When calculating key figures for equity and the equity certificates, accrued interest on hybrid tier 1 capital is thus deducted from the accounting result.

At the same time, hybrid tier 1 capital is deducted from the equity on the balance sheet. This ensures that the key figures relevant to the Bank's owners are calculated on the basis of the result and the equity that actually belong to the owners.
The contract terms and conditions for hybrid Tier 1 instruments mean that they are included in the Bank's Tier 1 capital for capital adequacy purposes, see note 5.

Parent bank and Group

AMMOUNT IN NOK MILLION	31.12.24	31.12.23
Perpetual hybrid Tier 1		
2099 3 m NIBOR + 2.80 %	**200**	
2099 3 m NIBOR + 3.35 %	**200**	200
2099 3 m NIBOR + 3.10 %	**300**	300
2099 3 m NIBOR + 2.60 %	**350**	350
2099 3 m NIBOR + 3.40 %	**200**	200
Fixed interest rate 7.53 %	**200**	200
Total perpetual hybrid Tier 1	**1 450**	1 250
Average interest perpetual hybrid Tier 1	**7,81 %**	6,98 %

Note 43 Events occurring after the end of the year

The annual accounts are deemed to be approved for publication when the Board has approved the accounts. The Supervisory Board and regulatory authorities may refuse to approve the published annual accounts after this, but they cannot change the accounts. Events occurring up to the time when the financial statements are approved for publication involving issues that were already known on the date of the balance sheet will form part of the information basis for determining estimates and will thereby be fully reflected in the annual accounts. Events that were not known on the balance sheet date will be reported if they are significant. The annual accounts have been prepared on the basis that the group will continue as a going concern. This assumption was valid in accordance with the Boards opinion at the time the financial statements were approved for publication.

The proposed distribution of a cash dividend from the profit of the year is 878 NOK million (703 NOK million) to the equity capital certificate holders in SpareBank 1 Nord-Norge and 1 016 NOK million (813 NOK million) as donations to community-owned capital. This proposal has not been declared as at the date of the balance sheet, and has therefore not been recognised as a liability on the balance sheet. It is still included in the equity.

Statement from the Board of Directors and Chief Executive Officer

Today the Board of Directors and the Chief Executive Officer have considered and adopted the financial report and the consolidated financial statements of SpareBank 1 Nord-Norge for the period from 1 January to 31 December 2024.

We confirm to the best of our knowledge that the financial statements for the period from 1 January to 31 December 2024 have been prepared in accordance with current applicable accounting standards and give a true and fair view of the assets, liabilities, financial position and profit or loss of the group takes as a whole. We also confirm the annual financial report gives a true and fair view of important events during the accounting period and their influence on the financial statements, the most important elements of risk and uncertainty that the group faces in the next accounting period, and a description of related parties' material transactions.

On March 5, 2025, the board approved the annual financial statements and annual report. Subsequently, it was discovered that greenhouse gas emissions in scope 3 category 15 from one alliance company were missing. This was corrected in the climate accounts and approved by the board on April 7, 2025 (see further in chapter 3.8, Table 3-8). The board's assessment is that other parts of the annual report do not need to be adjusted as a result of these circumstances. The correction results in the annual financial statements and annual report having different signing dates.

Tromsø, 05.03.25 / 07.04.25

The Board of Directors and Chief Ececutive Officer in SpareBank 1 Nord-Norge

This document is electronically signed, see confirmation after the auditor's report.

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To the Supervisory Board of SpareBank 1 Nord-Norge

Independent Auditor's Report

Report on the Audit of the Financial Statements

Opinion

We have audited the financial statements of SpareBank 1 Nord-Norge, which comprise:

- the financial statements of the parent company SpareBank 1 Nord-Norge (the Company), which comprise the balance sheet as at 31 December 2024, the income statement, statement of comprehensive income, statement of changes in equity and statement of cash flows for the year then ended, and notes to the financial statements, including material accounting policy information, and

- the consolidated financial statements of SpareBank 1 Nord-Norge and its subsidiaries (the Group), which comprise the balance sheet as at 31 December 2024, the income statement, statement of comprehensive income, statement of changes in equity and statement of cash flows for the year then ended, and notes to the financial statements, including material accounting policy information.

In our opinion

- the financial statements comply with applicable statutory requirements,

- the financial statements give a true and fair view of the financial position of the Company as at 31 December 2024, and its financial performance and its cash flows for the year then ended in accordance with IFRS Accounting Standards as adopted by the EU, and

- the consolidated financial statements give a true and fair view of the financial position of the Group as at 31 December 2024, and its financial performance and its cash flows for the year then ended in accordance with IFRS Accounting Standards as adopted by the EU.

Our opinion is consistent with our additional report to the Audit Committee.

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Financial Statements* section of our report. We are independent of the Company and the Group as required by relevant laws and regulations in Norway and the International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code), and we have fulfilled our other ethical

responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

To the best of our knowledge and belief, no prohibited non-audit services referred to in the Audit Regulation (537/2014) Article 5.1 have been provided.

We have been the auditor of the Company for 29 years from the election by the Supervisory Board from the accounting year of 1996, with a renewed election by the Supervisory Board in 2008.

Key Audit Matters

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the financial statements of the current period. These matters were addressed in the context of our audit of the financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

1. Expected credit loss allowance on loans and advances in the corporate market

Reference is made to Note 3 Critical estimates and assessments regarding the use of accounting principles, Note 7 Credit risk exposure for each internal risk rating, Note 8 Maximum credit exposure, Note 9 Credit quality by class of financial assets, Note 11 Loans, Note 13 Losses and to the section losses and defaults on loans in the Board's annual report.

The key audit matter	*How the matter was addressed in our audit*
Expected credit loss allowance on loans and advances that are not impaired amounts to MNOK 481 for the Group, of which MNOK 431 relates to expected credit losses in the corporate market. Expected credit loss allowance on credit impaired loans and advances amounts to MNOK 379 for the Group, of which MNOK 315 relates to expected credit losses in the corporate market. IFRS 9 requires the Group to calculate expected credit loss (ECL) over the next 12 months for loans and advances that have no significant increase in credit risk (stage 1), and lifetime ECL for loans and advances that have significant increase in credit risk (stage 2). The Group uses models for calculating ECL in stage 1 and 2. The model-based calculations are complex and process a high volume of data. Further, there are management judgement involved with determination of estimate parameters, including: • definition of significant increase in credit risk (SICR), • probability of default (PD), • loss given default (LGD), • exposure at default (EAD), • determination and weighting of the different expected future macroeconomic scenarios	We have formed an understanding of the Group's definitions, methods and internal control for recognition and measurement of expected credit loss allowance for the corporate market. We involved our specialist to assess the Group's methods and policies for internal validation of the IRB-models, as well as to evaluate the internal validation's results to assess possible deviations and consequences for our audit. We have obtained assurance reports with reasonable assurance (ISAE 3000) from an independent auditor who has considered: • whether PD, LGD and EAD included in the model are correctly calculated, • whether the data used in the calculations is correct, and • whether the model calculates ECL in accordance with the requirements of IFRS 9. We have evaluated the independent auditor's competence and objectivity, as well as evaluated the reports to assess possible deviations and consequences for our audit.

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SpareBank 1 Nord-Norge has developed internal rating based models (IRB) for calculation of PD, LGD and EAD. Further, the Group has developed their own model for calculation of expected credit losses based on these IRB-models. Impaired loans and advances, where credit risk has increased significantly and where there is objective evidence of default, are subject to individual assessments to estimate lifetime ECL (stage 3). To calculate the ECL, management is required to make estimates and assumptions, including: • timely identification of impaired loans and advances, • the expected future cash flows including the value of underlying collateral. Based on the size of gross lending, inherent credit risk, the complexity of the models' calculations and the degree of management judgement when preparing the estimates, we consider the expected credit loss allowance in the corporate market to be a key audit matter.	We have performed additional procedures over the data used in the ECL model. We have assessed the Group's definition of SICR by comparison against information available for similar banks. For other relevant assumptions made by management, we have performed sensitivity tests and evaluated the Group's future economic scenarios against historical loss levels and external macro-economic reports. For a selection of loans and advances in stage 3, we have reperformed the calculation of expected credit loss, and assessed the projected cash flows against historical financial results, budgets and external valuations of collaterals where applicable. In order to challenge management whether there should have been other loans and advances under individual loss assessment, we have, based on various criteria, tested a selection of high-risk loans and advances. We have assessed whether the disclosures related to IFRS 9 and ECL are sufficient and in accordance with IFRS 7.

2. IT systems and application controls

The key audit matter	*How the matter was addressed in our audit*
SpareBank 1 Nord-Norge is dependent on the IT infrastructure in the Group is functioning as intended. The Group uses a standard core system delivered and operated by an external service provider. Sound governance and control over the IT systems is critical to ensure accurate, complete and reliable financial reporting. Furthermore, the IT systems support regulatory compliance for financial reporting to authorities,	In connection with our audit of the Group's IT-system, we have gained an understanding of the control environment and tested that selected general IT controls are functioning as intended and support important application controls. In our control testing, we have focused on access management controls. The independent auditor of the external service provider has assessed and tested the effectiveness of internal controls related to the IT systems outsourced to external service provider. We have obtained the attestation report (ISAE 3402) from the independent auditor to evaluate

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which is central to licensed businesses. The system calculates interest on borrowing and lending and the Group's internal control systems are based on system-generated reports. Due to the importance of the IT systems for the Group's operations, the IT environment supporting the financial reporting process is considered a key audit matter.	whether the external service provider has satisfactory internal control in areas of significant importance to SpareBank 1 Nord-Norge. We have assured ourselves of the independent auditor's competence and objectivity, as well as evaluated the report in order to assess possible deviations and consequences for our audit. We have requested the independent auditor at the service provider to test a selection of standard reports and key functionalities in the core-system (ISAE 3000) to assess whether: • selected standard system reports contain all relevant data and are reliable, • the key functionalities, including controls related to interest rate-, annuity- and fee calculations, work as intended. We have inquired management for their evaluation and follow-up of the independent auditor's report for the external service provider to ensure that any findings are appropriately followed up. We have used our IT audit specialist in the work to understand the control environment, test controls and examine the reports.

Other Information

The Board of Directors and the Managing Director (management) are responsible for the information in the Board of Directors' report and the other information accompanying the financial statements. The other information comprises information in the annual report, but does not include the financial statements and our auditor's report thereon. Our opinion on the financial statements does not cover the information in the Board of Directors' report nor the other information accompanying the financial statements.

In connection with our audit of the financial statements, our responsibility is to read the Board of Directors' report and the other information accompanying the financial statements. The purpose is to consider if there is material inconsistency between the Board of Directors' report and the other information accompanying the financial statements and the financial statements or our knowledge obtained in the audit, or whether the Board of Directors' report and the other information accompanying the financial statements otherwise appears to be materially misstated. We are required to report if there is a material misstatement in the Board of Directors' report or the other information accompanying the financial statements. We have nothing to report in this regard.

Based on our knowledge obtained in the audit, it is our opinion that the Board of Directors' report

- is consistent with the financial statements and
- contains the information required by applicable statutory requirements.

Our opinion on the Board of Director's report applies correspondingly to the statements on Corporate Governance and Corporate Social Responsibility.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation of financial statements that give a true and fair view in accordance with IFRS Accounting Standards as adopted by the EU, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Company's and the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Group or to cease operations, or has no realistic alternative but to do so.

Auditor's Responsibilities for the Audit of the Financial Statements

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

As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional scepticism throughout the audit. We also:

- identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error. We design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's and the Group's internal control.
- evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's and the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company and the Group to cease to continue as a going concern.
- evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves a true and fair view.
- obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on the consolidated financial statements. We are responsible for the direction, supervision and performance of the group audit. We remain solely responsible for our audit opinion.

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

We also provide the Audit Committee with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with the Board of Directors, we determine those matters that were of most significance in the audit of the financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

Report on Other Legal and Regulatory Requirements

Report on Compliance with Requirement on European Single Electronic Format (ESEF)

Opinion
As part of the audit of the financial statements of SpareBank 1 Nord-Norge, we have performed an assurance engagement to obtain reasonable assurance about whether the financial statements included in the annual report, with the file name 549300SXM92LQ05OJQ76-2024-12-31-0-no, have been prepared, in all material respects, in compliance with the requirements of the Commission Delegated Regulation (EU) 2019/815 on the European Single Electronic Format (ESEF Regulation) and regulation pursuant to Section 5-5 of the Norwegian Securities Trading Act, which includes requirements related to the preparation of the annual report in XHTML format, and iXBRL tagging of the consolidated financial statements.

In our opinion, the financial statements, included in the annual report, have been prepared, in all material respects, in compliance with the ESEF regulation.

Management's Responsibilities
Management is responsible for the preparation of the annual report in compliance with the ESEF regulation. This responsibility comprises an adequate process and such internal control as management determines is necessary.

Auditor's Responsibilities
Our responsibility, based on audit evidence obtained, is to express an opinion on whether, in all material respects, the financial statements included in the annual report have been prepared in compliance with ESEF. We conduct our work in compliance with the International Standard for Assurance Engagements (ISAE) 3000 – "Assurance engagements other than audits or reviews of historical financial information". The standard requires us to plan and perform procedures to obtain reasonable assurance about whether the financial statements included in the annual report have been prepared in compliance with the ESEF Regulation.

As part of our work, we have performed procedures to obtain an understanding of the Company's processes for preparing the financial statements in compliance with the ESEF Regulation. We examine whether the financial statements are presented in XHTML-format. We evaluate the completeness and accuracy of the iXBRL tagging of the consolidated financial statements and assess management's use of judgement. Our procedures include reconciliation of the iXBRL tagged data with the audited financial statements in human-readable format. We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Tromsø, 5 March 2025

KPMG AS

Stig-Tore Richardsen
State Authorised Public Accountant

Note: This translation from Norwegian has been prepared for information purposes only.

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List of Signatures

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Name	Method	Signed at
Stormo, Kjersti Terese	BANKID	2025-03-05 18:25 GMT+01
Kræmer, Hanne Karoline	BANKID	2025-03-05 20:08 GMT+01
Carlsen, Sigurd	BANKID	2025-03-05 18:22 GMT+01
Berntsen, Kjetil	BANKID	2025-03-05 18:19 GMT+01
Frantzen, Eirik	BANKID	2025-03-05 18:15 GMT+01
Tveiterås, Kathrine	BANKID	2025-03-05 18:14 GMT+01
Slettli, Trude	BANKID	2025-03-05 19:15 GMT+01
Nilsen, May Britt	BANKID	2025-03-05 19:09 GMT+01
Bygdnes, Rolf Eigil	BANKID	2025-03-05 18:54 GMT+01
Semmingsen, Semming	BANKID	2025-03-05 18:26 GMT+01

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List of Signatures

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Årsrapport 2024 - korrigert v.4.pdf

Name	Method	Signed at
Tveiterås, Kathrine	BANKID	2025-04-07 10:31 GMT+02
Semmingsen, Semming	BANKID	2025-04-07 10:40 GMT+02
Nilsen, May Britt	BANKID	2025-04-07 10:30 GMT+02
Kræmer, Hanne Karoline	BANKID	2025-04-07 10:30 GMT+02
Berntsen, Kjetil	BANKID	2025-04-07 10:30 GMT+02
Bygdnes, Rolf Eigil	BANKID	2025-04-07 10:29 GMT+02
Stormo, Kjersti Terese	BANKID	2025-04-07 10:39 GMT+02
Slettli, Trude	BANKID	2025-04-07 10:37 GMT+02
Carlsen, Sigurd	BANKID	2025-04-07 10:33 GMT+02
Frantzen, Eirik	BANKID	2025-04-07 10:32 GMT+02

Alternative performance measures

SpareBank 1 Nord-Norge's alternative performance measures (APMs), provide relevant additional information to what is otherwise shown in the financial statements. These key figures are not defined through IFRS and cannot be directly compared with equivalent figures for other companies unless the same definition is used.

The alternative performance measures are not meant to replace any measurements/key figures under IFRS. The performance targets provide additional insight into the Group's operations and represent important targets in management's control of the Group's various business areas. Non-financial data or key figures governed by IFRS or other regulations, e.g. CRR/CRD, are not defined as APMs. The APMs are presented with comparable figures for the corresponding period last year.

	DEFINITION	RELEVANCE
Profitability		
Return on equity	Profit in relation to average equity. Calculated per the end of each quarter, along with opening and closing balances for the year. The return on equity for the period is reported on an annualised basis.	Return on equity is the Group's strategic target for profitability. The return on equity is a measure of profitability on the Group's performance factors.
Cost/income ratio	Total costs in relation to total income.	The cost/income ratio is a measure of the profitability of the Group's ongoing operations.
Interest margin	Net interest income in relation to average total assets. Average total assets are calculated as at the end of each quarter, along with opening and closing balances.	The interest margin shows the trend in the ratio between the sale price of products and lending costs from period to period. The interest margin measures the profitability of the Group's loan products.
Deposits		
Deposit-to-loan ratio	Total deposits are divided by total lending excluding intermediary loans.	The ratio shows the proportion of the Group's total lending financed through customer deposits, and the need for financing from external lenders.
Deposit-to-loan ratio incl. intermediary loans	Total deposits are divided by total lending including intermediary loans.	The ratio shows how much of the Group's total lending including intermediary loans has been funded through customers' deposits.
Growth in deposits	Deposit growth is measured quarterly as the percentage change in the Bank's deposits in the last 12 months.	Measures both customer growth and changes in the financing situation.
Lending		
Growth in lending (%)	Growth in lending excl. intermediary loans is measured quarterly as the percentage change in the Bank's customer loans in the last 12 months.	Shows the growth in the Bank's core area, customer lending. The calculation does not include liquidity portfolio/loans to credit institutions.
Growth in lending, incl. intermediary loans (%).	Growth in lending incl. intermediary loans is measured quarterly as the percentage change in the Bank's customer loans in the last 12 months.	Shows the growth in the Bank's core area, including intermediary loans.
Proportion of loans deducted	Measured as the percentage of loans deducted in relation to gross lending.	A not insignificant part of the bank's lending is transferred to SpareBank1 Boligkreditt or SpareBank1 Næringskreditt as intermediary loans and deducted from the balance. This key figure shows the percentage of loans in this category.
Proportion of loans deducted, retail market	Measured as the percentage of loans deducted in relation to gross lending to the retail market.	Deducted portion of the retail market. The bulk of deducted loans are in the retail market segment.
Losses and non-performing loans		
Loan losses (%)	Total posted losses year to date in relation to total lending volume incl. intermediary loans.	Measures the relative importance of losses set against the rest of the portfolio of loans. Relevant for estimating future expected losses and the Group's credit risk.
Commitments in default (%)	Percentage of overdue commitments (over 90 days) in relation to total lending volume incl. intermediary loans.	Measures the relative importance of non-performing loans set against the rest of the portfolio of loans. Relevant for estimating future expected defaults and the Group's credit risk.
Doubtful commitments (%)	Percentage of impaired commitments in relation to total lending volume incl. intermediary loans	Measures the relative importance of non-performing loans set against the rest of the portfolio of loans. Relevant for estimating future expected defaults and the Group's credit risk.
Net defaulted and doubtful commitments (%)	Defaulted and doubtful commitments are adjusted for individual loss write-downs and expressed as a proportion of gross lending incl. intermediary loans.	Defaulted and doubtful commitments are netted off against loss provisions in Stage 3.
Loss provision ratio	Ratio between total loss provisions and non-performing and impaired commitments.	Shows the percentage of losses and non-performing loans that have been raised in Stage 3 of loss provisions.

AMOUNT IN MNOK	31.12.24	31.12.23
Profit for the period	3 663	2 548
Deduct interest hybrid tier 1 capital	100	60
Profit for the period incl. interest hybrid tier 1 capital	**3 563**	**2 488**
Total Equity	19 339	17 190
Deducting hybrid Tier 1 capital	1 450	1 250
Equity excl. hybrid Tier 1 capital	**17 889**	**15 940**
Average equity excl. hybrid tier 1 capital	**16 356**	**15 149**
Profit for the period, annualised incl. interest hybrid tier 1 capital	3 563	2 488
Average equity excl. hybrid tier 1 capital	16 356	15 149
Return on Equity	**21.8%**	**16.4%**
Total operating expenses	2 003	1 825
Total income	6 625	5 214
Cost-income ratio	**30.2%**	**35.0%**
Net interest income	4 028	3 627
Average total assets	132 721	127 155
Interest margin	**3.03%**	**2.85%**
Deposits from customers	87 618	82 495
Total lending incl. intermediary loans at the end of period	150 571	143 438
Deposits as a percentage of total lending incl. loans transferred to covered bond companies	**58.2%**	**57.5%**
Deposits from customers	87 618	82 495
Gross loans to customers	102 654	98 789
Deposits as a percentage of gross lending	**85.4%**	**83.5%**

AMOUNT IN MNOK	31.12.24	31.12.23
Total lending incl. loans transferred to covered bond companies	**150 571**	143 438
Total lending incl. loans transferred to covered bond companies last year	**143 438**	133 243
Lending growth last 12 months incl. loans transferred to covered bond companies	**7 133**	10 195
Lending growth last 12 months incl. loans transferred to covered bond companies	**5.0%**	7.7%
Total lending	**102 654**	98 789
Total lending last year	**98 789**	93 513
Lending growth last 12 months	**3 865**	5 276
Lending growth last 12 months	**3.9%**	5.6%
Total loans transferred to covered bond companies	**47 917**	44 649
Total lending incl. loans transferred to covered bond companies last year	**150 571**	143 438
Share of intermediatry loans	**31.8%**	31.1%
Loans transferred to SpareBank 1 Boligkreditt AS	**47 840**	44 521
Total retail lending end of period	**98 027**	92 823
Share of loans transferred to covered bond companies of total retail lending	**48.8%**	48.0%
Loans transferred to SpareBank 1 Næringskreditt AS	**77**	128
Total corporate lending end of period	**54 938**	52 920
Share of loans transferred to covered bond companies of total corporate lending	**0.1%**	0.2%
Deposits from customers	**87 618**	82 495
Deposits from customers last year	**82 495**	79 484
Growth in deposits from customers past 12 months	**5 123**	3 011
Growth in deposits from customers past 12 months	**6.2%**	3.8%
Losses on loans and guarantees	**110**	116
Losses on loans and guarantees, annualised	**110**	116
Total lending incl. loans transferred to covered bond companies	**152 965**	145 742
Losses on loans to customers as a percentage of total lending incl. loans transferred to covered bond companies	**0.1 %**	0.1%
Gross loans in stage 3	**1 767**	858
Loss provisions stage 3	**–379**	–271
Net commitments in default	**1 388**	587
Total lending incl. loans transferred to covered bond companies	**152 965**	145 742
Net comm. in default and at risk of loss as a per. of total lending incl. loans transferred to covered bond companies	**0.9%**	0.4%
Non-performing commitments	**1 767**	858
Loss provisions stage 3	**–379**	–271
Loan loss provision ratio	**21.4%**	31.6%

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