

Statement on Corporate governance

2023

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 14.10.22. 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 on compliance with the Norwegian Code of Practice for Corporate Governance.

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 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 equity certificate (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 the 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!» Further information about the Bank's vision, business idea and strategic and financial goals can be found on our website: <https://www.sparebank1.no/nb/nord-norge/om-oss/om-banken/visjon-og-forretningside.html>.

The Board of Directors adopts clear objectives, strategies and risk profiles for the business. This is to ensure that the Bank creates value for its EC holders and investors in a sustainable manner. The Board of Directors takes environmental, social and governance (ESG) conditions into account.

The Bank's corporate governance rules were last approved by the Board of Directors on 07.02.24. 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:

[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:

Ingen

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 31.12.23, the SpareBank 1 Nord-Norge Group's Common Equity Tier 1 (CET1) capital ratio was 17.15 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 January 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 30.03.23 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 24.05.24.

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 31.12.23, 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 2023.

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 2023, 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 518 employees availed themselves of the offer in 2023. The average amount saved was about NOK 2 206 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 og Finnmark County Council: 2 members and 2 substitute members
- 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 2023 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. Five of the Board of Directors' nine members were women, four 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 12 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 in the annual report and 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 12 meetings a year. In 2023, the Board met 15 times.

SIGNIFICANT INTERESTS

The instructions to the Board of Directors provide that a board member may not participate in the considera-

tion 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 instructions to the Board of Directors state how the Board and Group Management shall deal with agreements with related parties and include provisions requiring an independent valuation to be obtained. No such agreements with related parties exist at present. Board members are defined as primary insiders and must abide by the Bank's rules governing acquisition of ECs of the Bank and banks in the SpareBank 1 Alliance. In the consideration of commitments involving companies in which a board member holds a position or

has an interest, the member concerned shall declare himself/herself disqualified and withdraw from the meeting. Board members and senior employees shall also inform the Board of Directors if they, directly or indirectly, have a significant interest in an agreement entered into by the Bank

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 2023, 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:

- The audit committee may not consist of members of any other board committee, with the following exceptions/clarifications:
- The members of the audit committee may be members of the appointments committee and other
- ad hoc committees.
- the risk committee or the appointments 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 2023, the committee comprised two women and one man.

Mandat:

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 2023, 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
- 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.

INTERNAL AUDIT

The internal audit function is a tool employed by the Board of Directors and Group Management to ensure that the risk management process is targeted, efficient and functions as intended. EY delivers internal audit services to the Group. The internal audit covers the Group's entire business. This also includes material activities that are outsourced, as well as subsidiaries that are subject to the regulations on risk management and internal control or that engage in activity considered to be of material significance for the Group. The internal audit's main task is to confirm that the established internal controls function as intended, and to ensure that established risk management measures are adequate in relation to the Bank's risk profile.

The internal audit function reports every four months to the Board of Directors, which adopts annual plans and budgets for the internal audit. Reports and recom-

recommendations issued by the audit function concerning improvements to the Bank's risk management are reviewed and implemented on a continuous basis. An audit plan is prepared and is discussed with Group Management, considered by the risk committee and approved by the Board of Directors. The internal audit's risk assessments determine which areas shall be reviewed.

Specific audit reports are prepared, containing results and recommended improvements. These are presented to the responsible manager and Group Management. A summary of the reports is submitted on a four-monthly basis to the risk committee and the Board of Directors. Any consultancy work is carried out in keeping with the standards and recommendations that apply to internal auditors (IIA/NIRF).

RISK MANAGEMENT FUNCTION

This function is independent of the business lines and has overarching responsibility for overall and coherent risk management and internal controls, including responsibility for the Group's risk models and the further development of effective risk management systems, etc.

A job description for the head of this function (CRO) is in place. This is revised and adopted by the Board of Directors annually.

COMPLIANCE FUNCTION

The compliance function is independent of the business lines and is responsible for overseeing compliance with regulatory requirements and internal policies in the Group. The head of the compliance function can report directly to the Board of Directors.

The head of the compliance function is responsible for:

- Ensuring that the compliance function has a risk-based approach to the control tasks and that a compliance plan is prepared that will provide a basis for checks and prevention work. Ensuring control actions are documented and events and deviations registered.
- Checking and monitoring that the Group always complies with the applicable external and internal

regulations and ensuring that measures taken to deal with non-compliance are sufficient.

- Fulfilling the role of compliance officer, in accordance with section 35(2) of the Money Laundering Act.
- Fulfilling the role of compliance officer for the investment firm.
- Facilitating effective identification of risks for non-compliance with relevant external requirements, as well as advising on risk-mitigating measures.
- Keeping the Group CEO continuously informed about the development and operation of their area of responsibility.
- Further developing the framework for managing relevant compliance risks in the Group in line with the adopted risk strategy.
- Prevention work against, and ongoing control of, money laundering and terrorist financing.
- Independent management and board reporting of the Group's compliance risk.
- Providing training, guidance, and advice
- Monitoring and following up the effectiveness of the control measures.
- The head of the compliance function must be presented with strategies and business plans and participate in the assessments if the institution expands its business areas or launches new products. Before decisions regarding new or significantly changed products, services or processes are made, head of the compliance function must submit an assessment on whether compliance has been adequately ensured.
- Giving the Group advice and guidance on acceptable behaviour and practice in relation to the interpretation of external and internal regulations.

The compliance function in the investment firm is performed by the Group's compliance department. A job description exists for the head of the compliance function. The job description is revised and adopted by the Board of Directors annually. It includes responsibility for the investment firm's compliance.

Deviations from point 9 of the Code of Practice:

None.

POINT 10 OF THE CODE OF PRACTICE:

Risk management and internal control

STRATEGIC PRINCIPLES FOR RISK AND CAPITAL MANAGEMENT

Risk and capital management at SpareBank 1 Nord-Norge is aimed at supporting the Group's strategic development and goal attainment. It shall also ensure financial stability and prudent asset management. This shall be achieved through the strategic principles:

Insight

- A good understanding of the Group's risk exposure.
- A healthy risk culture characterised by a high awareness of risk management and internal control.

Quality

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

Customer-oriented

- Understanding how various customer activities drive risk in the business.
- Balancing the relationship between risk and business in a good manner.

Sustainability

- Optimised relationship between risk and profitability that ensures long-term value creation.
- SpareBank 1 Nord-Norge shall not offer products and/or services, or carry out actions, that entail a significant risk of complicity in unethical behaviour, violations of human or labour rights, corruption or environmental destruction.

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 AREA	RISK WILLINGNESS 2023	
	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	Low to 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.

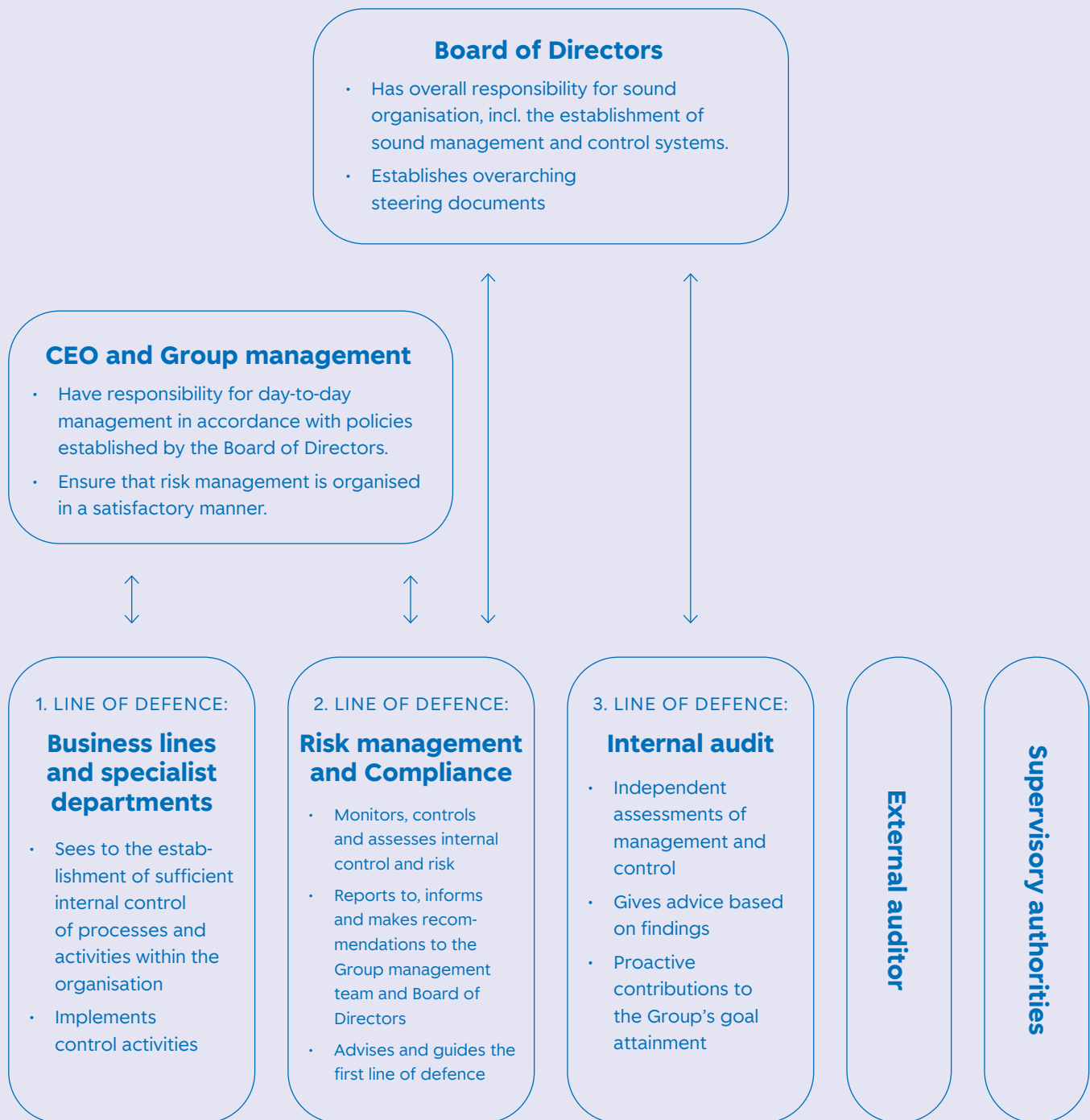
Principles of risk management and internal control

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.
- **Operationalisation:** risk management and internal control shall be underpinned by governing documents and system support for measurement and documentation ensuring processes that are comprehensive in nature and of the right quality.
- **Quality:** risk management and internal control shall be of the right quality and be subject to continuous improvement and development.

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 manage-

ment. 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. For further information, see points 9 and 15 of the Code of Practice.

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 Chairman of the Board is 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.

In 2023, the Group's savings scheme did not cover board members other than employee-elected board members.

Deviations from point 11 of the Code of Practice: None. Employee-elected board members participate in the Group's employee savings scheme.

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 following principles are applied when determining any variable remuneration for senior personnel:

1. There should be an appropriate balance between fixed and variable remuneration. The fixed component of the employee's remuneration should be high enough to give the institution the option of paying no variable component at all.
2. For employees covered by the Financial Institutions Regulations, variable remuneration may not total more than 100 per cent of the fixed remuneration. The Supervisory Board of the Bank, and the annual general meeting at subsidiaries, may decide that the limit can be increased to 200 per cent if the requirements for consideration in the institution's governing bodies, etc. are met.
3. Any variable remuneration shall not constitute more than 50 per cent of the fixed salary for the Group CEO and Group Management of the Bank.
4. The basis for variable remuneration related to the department's results shall be a period of at least 2 years. Variable remuneration may however be earned annually, based on assessments of financial and non-financial performance over at least 2 years.
5. The determination of variable remuneration shall be based on an assessment of the person's performance, as well as the results for the business unit and the Group as a whole. When measuring risk, all risks arising from the operations of the financial institution must be taken into account, including the cost of capital and liquidity needed by the institution.
6. At least half of the variable remuneration shall be paid in the form of ECs in SpareBank 1 Nord-Norge. The right of disposal over such ECs shall be accrued pro rata over a period of 3 years from the time the variable remuneration was determined. During this period, the ECs may not be bought and sold by the employee. The period shall take account of the underlying business cycle and risk present in the institution. Such part of the variable remuneration will be reduced if either the institution's performance or subsequent results call for this to be done.
7. The overall variable remuneration shall not limit the Group's ability to strengthen its own funds.
8. Any individual variable bonus scheme shall be reduced on a krone-for-krone basis by the amount of any profit share (Group or institution bonus).
9. Variable remuneration is not paid in the form of ownership interests in associates (internal companies), or in any other way that might circumvent the institution's remuneration policy.
10. Senior personnel may not have agreements or insurance that protects against the non-payment of performance-based remuneration.

11. Remuneration of employees with control responsibilities shall be independent of the results of the business line that they control.

The Group CEO, or whomever he designates, is responsible for submitting each year a presentation to the remuneration committee in connection with the

granting of variable remuneration to senior personnel. The remuneration committee will submit this to the Board of Directors.

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 improve-

ments. 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.



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