General Guidelines for Corporate Social Responsibility and Sustainability

SpareBank 1 Nord-Norge (SNN) shall act as a responsible contributor to society with a clear sustainability profile. This is deeply rooted in the Group’s business and risk strategy and the Group has its own sustainability policy.

The purpose of the guidelines is to ensure:

- That SNN is a positive contributor to responsible and sustainable business activities.
- That SNN helps reduce the risk of involvement in unwanted business activities.
- That SNN has a common framework for the implementation of criteria for corporate social responsibility and sustainability.

SNN’s work on corporate social responsibility and sustainability includes a number of different subject areas and shall be integrated into the Group’s core activities and followed up by its own sustainability guidelines in the most important areas. The following main principles apply to the whole Group. We also encourage our business partners, such as customers and suppliers, to follow the same guidelines and require the same from their business partners.

**Environment**

- SNN shall contribute to green competitiveness and sustainable value creation in cooperation with customers, society and relevant partners.
- SNN shall not contribute to serious environmental damage, including extensive greenhouse gas emissions and irreversible damage to vulnerable areas, ecosystems or human groups.

**Society (Social)**

- SNN shall be a positive contributor to social development in the local community and is committed to contributing annually in the following areas: innovation, youth, local community, arena and knowledge.
- SNN shall not contribute to violations of human rights, workers’ rights and international law.
- SNN shall not contribute to the development, testing, production, storage or transportation of controversial weapons or components exclusively intended for controversial weapons including cluster weapons, anti-personnel mines, nuclear weapons, chemical weapons and biological weapons.
- SNN shall not contribute to making weapons available for countries that are sanctioned by the UN, EU or the United States.
- SNN shall not finance companies that are engaged in the production of tobacco.
- SNN shall not finance companies that are engaged in the production of pornographic material.

**Corporate Governance and Corporate Management (Governance)**

- SNN shall encourage transparency and good governance models, including ownership structures, investments, transactions, tax payments, business associates, national and international lobbying, etc., as well as compliance documentation. These apply to our business partners.
• SNN shall not contribute to financial crime, including corruption and money laundering in our own business activities and companies we interact with or invest in. The Group shall have good procedures for identifying and following up on this. Encourages business associates to do the same.

• SNN shall pay tax according to the applicable rules and never advises clients to do active tax planning for the main purpose of avoiding taxes.

• On suspicion of corruption or other financial crime, SNN shall help to ensure transparency and contribute to the investigation of the matter. Companies should also be open about any criminal proceedings they are or have been subject to.

SNN continuously documents the follow-up of matters that represent serious violations of our guidelines for corporate social responsibility and sustainability.