

General Guidelines for Equal Opportunities and Diversity (Policy Document)

Last revised	<i>September 2020 – approved by the Group Management</i>
Owner	<i>Head of HR and Legal</i>
Responsible	<i>Head of HR and Legal</i>

Background:

Sustainability is one of SpareBank 1 Østlandet's six main strategic goals for the bank. Equal opportunities and diversity are central to the work on sustainability and are therefore important for the bank.

Several of the UN Sustainable Development Goals include equal opportunities. Through the UN Guiding Principles on Business and Human Rights, adopted in 2011, the world community has determined that companies and business actors have an independent responsibility to respect human rights, which include equal opportunities, non-discrimination and diversity. According to Guiding Principle 15, all companies should have policy commitments on human rights, conduct due diligence assessments to avoid contributing to violations and have processes in place to address any human rights violations. They shall also encourage their own business associates to do the same, especially within their own supply chains. This applies to all companies, including SpareBank 1 Østlandet and our business associates.

The ILO is the UN's international special organisation for working conditions. It is a tripartite organisation consisting of employees represented by unions, employers represented by employers' organisations and the 187 member states' authorities. The purpose of the ILO is to promote social justice and rights in the workplace. The ILO Conventions are binding international legal instruments that regulate most areas of employment. Two of the ILO's eight fundamental conventions deal with the prohibition against discrimination based on gender, religion, sexual orientation, etc. In Norway, discrimination is also prohibited by the Equality and Anti-Discrimination Act and the Working Environment Act.¹

The UN Sustainable Development Goals, the UN Guiding Principles on Business and Human Rights, the ILO Conventions and Norwegian law provide guidelines for how SpareBank 1 Østlandet should work in relation to equal opportunities and diversity.

Definition of equal opportunities and diversity:

Equal opportunities means equal rights, opportunities and responsibilities for men and women, irrespective of birth gender. Equal opportunities also includes equal opportunities and rights irrespective of age, ethnicity, disability, religion and sexual orientation.

The purpose of the guidelines and strategy:

This document shows how SpareBank 1 Østlandet (SB1Ø) approaches equal opportunities and diversity. Its contents also provide guidelines for how this work should be carried out in our own operations, in investments and in relation to customers and suppliers.

The document lists some of the most important conventions, frameworks and guidelines in the area of equal opportunities. This does not mean that other aspects are not important. They are, to varying degrees, also relevant to us, our customers and business associates, depending on the industry and the degree to which national or international operations or supply chains are involved. The operationalisation of these guidelines within the bank's various business areas is, therefore, described in the guidelines for the individual area, as well as in any guides, descriptions of procedure and checklists where necessary.

¹ <https://www.altinn.no/starte-og-drive/arbeidsforhold/ansettelse/forbud-mot-diskriminering-i-arbeidslivet/>

Expectations regarding equal opportunities and diversity within the group:

SpareBank 1 Østlandet's policy for diversity and equality is described in its HR strategy.

We recruit employees who reflect the society we are part of – regardless of cultural background, ethnicity, religion, gender and age.

It is important for the company to have a gender balance in both management and other roles, and we aim to increase the proportion of female managers from 40 to 45% by 2021.

Equal pay for work of equal value is assessed and practised as far as possible based on objective criteria.

Key activities. SpareBank 1 Østlandet:

- Participates in, and is committed to, the national "Inkluderende Arbeidsliv" ("Inclusive working life") programme for the inclusion of employees and jobseekers.
- Participates in a regional initiative "Muligheter med mangfold" ("Opportunities with diversity") where we give immigrants in need of language training and work placements an opportunity to work for a period of six months. This promotes greater diversity and helps to develop our corporate culture, and provides participants with useful experience and a much better basis for getting a permanent job at the end of their placement.
- Has taken a number of steps to avoid discrimination and promote equal opportunities among customers, including by striving to ensure that both genders receive all the information related to loans.²
- Follows universal design principles in its offices to facilitate access for employees with disabilities.
- Has a recruitment strategy that requires it to always consider candidates of both genders when recruiting for management positions.
- Uses recruitment tools that anonymise applicants in the first stage of the recruitment process to ensure the broad and neutral selection of candidates. This is done to avoid discrimination on the basis of gender, age and/or ethnicity.
- Offers flexible working hours and the option to work at home some of the time, which allows employees who are carers to adapt their hours to look after children or others in their care
- Provides the option of less demanding work and gradually reduced hours for older employees, in combination with drawing their pension
- Provides an extra week's holiday for employees aged over 60

Expectations regarding equal opportunities and diversity for customers, businesses we invest in and other business associates:

Our customers are expected to run their operations in line with internationally recognised conventions and national laws and regulations where they operate. Some important areas within inclusion and diversity are specified below. This does not mean that other areas are less important, but we want our customers and other business associates to particularly focus on ensuring that they:

² Men are often listed as the principal borrower and women as co-borrowers, which has consequences for the flow of information.

- Respect the UN's conventions on human and labour rights, including in particular the UN Convention on the Elimination of All Forms of Discrimination against Women,³ the UN Convention on the Rights of Persons with Disabilities⁴ and the UN's International Convention on the Elimination of All Forms of Racial Discrimination⁵
- Respect the [ILO's eight fundamental conventions](#), which establish a minimum level of rights that must be respected in the workplace, including a prohibition against discrimination.⁶
- Have good notification systems for breaches of the aforementioned main categories
- Include clauses with equality criteria in their contracts with suppliers and subcontractors
- Do not produce pornographic material
- Recruit employees who reflect the society we are part of – regardless of cultural background, ethnicity, religion, gender and age
- Maintain a gender balance in both management and other roles, ensure that both genders have equal access to management positions and take steps to promote this
- Practise equal pay for equal work based on objective criteria, and also promote this also in their supply chain, where the principle of a living wage is important, especially for vulnerable groups such as women, people with disabilities, ethnic minorities, etc.
- Have good notification systems for reporting breaches of expectations, norms, laws and conventions related to equality and diversity.

³ <https://www.ldo.no/ombudet-og-samfunnet/konvensjoner/fns-kvinnekonvensjon/>

⁴ <https://www.regjeringen.no/no/tema/likestilling-og-inkludering/likestilling-og-inkludering/konvensjoner/fn-konvensjonen-om-rettar-til-menneske-med-nedsett-funksjonsevne-crpd/id2426271/>

⁵ <https://www.fn.no/om-fn/avtaler/Menneskerettigheter/konvensjon-mot-rasediskriminering>

⁶ Convention concerning Discrimination in respect of Employment and Occupation, <https://lovdata.no/dokument/TRAKTAT/traktat/1958-06-25-1>