

## **Business ethics and whistleblower programme**

SpareBank 1 Østlandet has a strong focus on business ethics, and the Bank's Code of conduct is available on the website; [Code of Conduct](#)

The Code of Conduct applies to permanent and temporary employees, consultants, temporary workers, board members and deputy board members of the SpareBank 1 Østlandet Group.

### **Objectives**

The Group's employees and board members should be known for their high ethical standards due to their competence, honesty, fairness and ability to inspire confidence. At the same time, you must maintain the necessary professional distance in all of your interactions with others. We accept no form of conduct that could be perceived as bribery, corruption or attempts to improperly influence decision-making processes.

Our conduct and decisions must be based on the Bank's strategy and corporate social responsibility and sustainability goals. We must demonstrate our respect for basic human rights and consciously contribute to reducing impacts on the environment. We must actively work to comply with anti-money laundering and anti-terrorism funding regulations. Value must, within all business areas, be created in line with good consultancy practice and within a framework that does not require individual employees to breach the Code of Conduct in order to meet financial targets. The needs and interests of customers must be safeguarded through good, professional and honest customer management that ensures the customer is able to take conscious, well-informed choices.

Each and every manager is responsible for putting ethics on the agenda. Managers at all levels are also responsible for informing new employees about the content of the Code of Conduct.

The Code of Conduct also explicitly points to an external notification channel for any whistleblower.

The Bank has business only in Norway. The whistleblowing procedure is available in Norwegian, and therefore also available in all relevante languages.

### **Key activities**

- The Code of Conducts are an integral part of training programs for all new employees.
- SpareBank 1 Østlandet conducts a week with a focus on ethics every year, including all employees confirming that Code of Conduct has been read and understood. Information on whistleblowing procedures is an integrated part of our Code of conduct, and is thus actively communicated to all employees.
- An external notification channel (EY) available 24/7 has been established for potential whistleblowers. Guidelines have been confirmed by the board, and there is established an own managerial group to receive and act in actual cases. The internal policy for whistleblowing specifically points of the importance of non-retaliation.