

INVESTOR RELATIONS POLICY

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Investor Relations Policy

Owner	CFO
Written by	Head of Investor Relations
Approved by	CFO
Access	Public
Status	Approved
Version	4.0
Created	20 March 2017
Last amended	18 August 2025
Number of pages	8

Revision history:

Date	Version	Description	Author	Approved by
24 Aug. 2022	1.0	Revised in accordance with new IR recommendation	IR	Board meeting
18 Sep. 2023	2.0	Minor changes	IR	CEO
9 Sep. 2024	3.0	On quarterly consensus	IR	CFO
18 Aug. 2025	4.0	Minor changes	IR	CFO

INVESTOR RELATIONS POLICY

SpareBank 1 Østlandet annually assesses whether the bank's policy for investor relations (IR) is in line with the relevant laws and regulations, and with the Norwegian Code of Practice for Corporate Governance (from NUES) and the Oslo Børs Code of Practice for IR.

The notes below describe how SpareBank 1 Østlandet complies with the Oslo Børs Code of Practice for IR of 1 March 2021.

1. LANGUAGE

Performance reports and presentations, and any other price-sensitive information, must be published in both Norwegian and English at the same time. In case of doubt, the Norwegian version will apply.

Deviations from section 1 of the Code of Practice for IR: None

2. PUBLICATION OF INFORMATION

2.1 Annual reports, half-yearly reports and other interim reports

Annual and quarterly reports are published according to the advertised financial calendar. The bank's board of directors will normally approve financial reports after the stock exchange closes, for publication before the exchange opens on the next trading day.

The half-yearly report and interim reports for the first and third quarters are published as soon as possible, and no later than the 15th of the second month after the end of the accounting period. The annual report is normally published within three months of the end of the accounting period, unless otherwise announced in the financial calendar.

The interim reports are submitted in accordance with IFRS accounting standards.

Deviations from section 2.1 of the Code of Practice for IR: None

2.2 Information on future prospects/guiding etc.

Matters concerning future prospects/guiding are regularly related to circumstances that have not yet happened or are not yet finalised. This information may create expectations in the market. Differences between the actual financial results and what the company has previously communicated, as well as changes to previously published future prospects/guiding, may be subject to the duty of disclosure.

Other information deemed to be inside information must be published immediately, regardless of the opening hours of the stock exchange, unless the conditions for deferred disclosure are met.

As a general rule, SpareBank 1 Østlandet will not guide the market on future performance or results, but will publish selected financial targets in the medium and long term, report developments in relation to these and update these targets where relevant.

Deviations from section 2.2 of the Code of Practice for IR: None

3. INFORMATION ON THE COMPANY WEBSITE

The Bank's distribution channels for financial information to investors and the market are the "Investor Relations" area on the Bank's website and stock exchange announcements.

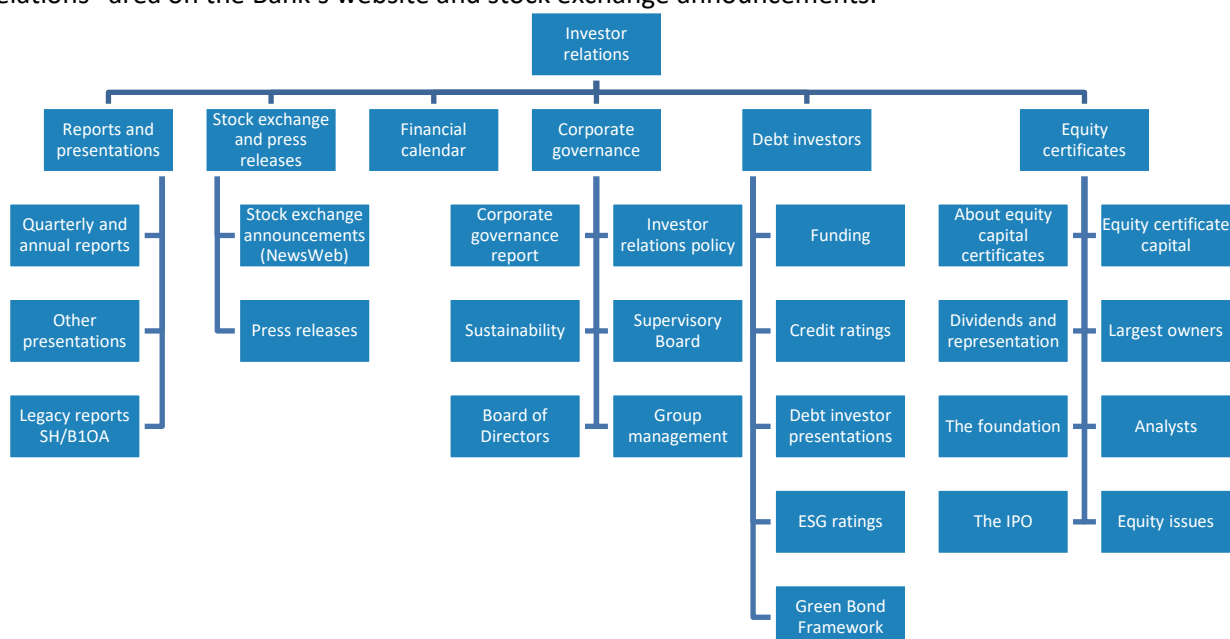


Figure 1 - Investor - Menu hierarchy

3.1 Corporate governance

3.1.1 Investor relations policy

SpareBank 1 Østlandet follows the Oslo Børs Code of Practice for IR of 1 March 2021. This is available in the "Corporate governance" area (see Figure 1).

3.1.2 The articles of association of the company

The bank's articles of association can be found in the "Corporate governance" area (Figure 1).

3.1.3 Board of directors and senior executives

An overview of the board and senior management, with brief CVs and numbers of equity certificates in SpareBank 1 Østlandet, is provided in the "Corporate governance" area (Figure 1).

3.1.4 Policy for corporate governance

SpareBank 1 Østlandet's overall principles for corporate governance are defined in the "Corporate governance" area (Figure 1). This is in accordance with the Code of Practice from the Norwegian Corporate Governance Board (NUES) of 14 October 2021.

3.1.5 Corporate social responsibility

Corporate social responsibility and sustainability are central to the bank's corporate governance. This is held in a separate area – "Sustainability" on the same level as "Investor relations policy". The area is also linked to from "Corporate governance" (Figure 1).

Deviations from section 3.1 of the Code of Practice for IR: None

3.2 The equity certificate

3.2.1 Holders of equity certificates

A daily updated list of the bank's 20 largest holders is held under "Equity certificate" (Figure 1). The list shows the number of equity certificates, percentage holding, type of account and country.

3.2.2 Price information

SpareBank 1 Østlandet was listed on Oslo Børs on 13 June 2017 under ticker "SPOL". Price information allowing for comparison with the benchmark index, as well as volume, order depth and latest transactions, is available under "Equity certificate" (Figure 1).

3.2.3 Analysis coverage and consensus estimates

Analysts who follow the company, and their contact information, are listed in "Analysts" under "Equity certificate" (Figure 1). The bank publishes consensus estimates based on input from analysts. Estimates are collected around quarter-end.

3.2.4 Notifiable primary insider trades

A list of notifiable trades in the last 12 months can be found on the main page "Investor" as well as via "Stock exchange and press releases" (Figure 1). If no primary insider trades took place in the last 12 months, this must be posted.

3.2.5 Flagging announcements

A list of flagging announcements in the last 12 months can be found in "Stock exchange and press releases" (Figure 1). If no flagging announcements were issued during the last 12 months, this must be posted.

3.2.6 General information about the equity certificate

Other information about the equity certificate can be found under "Equity certificate" (Figure 1).

Deviations from section 3.2 of the Code of Practice for IR: None

3.3 Information for holders of equity certificates

3.3.1 Supervisory Board

Documentation for and minutes of the last three years' (annual and extraordinary) meetings of the Supervisory Board ("committee of representatives" in the Code of Practice) can be found in "Corporate governance" (Figure 1)

3.3.2 Dividends

The dividend policy, and the dividend amounts for the last three years, is described under "Equity certificate" (Figure 1).

3.3.3 Prospectuses

Prospectuses and information documents prepared in the last ten years are held under "Equity certificate" (Figure 1).

3.3.4 The company's VPS account manager

SpareBank 1 Østlandet – Box 203, N-2302 Hamar – is itself the account manager in VPS.

Deviations from section 3.3 of the Code of Practice for IR: None

3.4 Funding

3.4.1 Financial strategy

SpareBank 1 Østlandets's financial strategy is described in "Funding", under "Debt investors" (Figure 1).

3.4.2 The company's debt financing

The Bank's debt financing with details of sources of financing, agreements and description of loans, is listed under "Funding". SpareBank 1 Østlandet's credit rating is also described in "Credit ratings" under "Debt investors" (Figure 1).

Deviations from section 3.4 of the Code of Practice for IR: None

3.5 Reports and company announcements

Published interim reports for the current year, as well as the five preceding years at a minimum, are available under "Reports and presentations". The same applies to the last five years' annual reports.

Press releases from the bank are available under "Stock exchange and press releases". Stock exchange announcements can be found on the same page with a link to Oslo Børs Newsweb, with access at least five years back in time.

Deviations from section 3.5 of the Code of Practice for IR: None

3.6 Presentations

Presentations given in connection with interim and annual reports must be open to all. Presentations are available as a webcast at least twice a year – normally after the second and fourth quarters. The presentation material is published beforehand on the bank's investor relations pages under "Reports and presentations" (Figure 1).

Other presentations from management with financial and strategic content are published on the Bank's website in the same place as interim and annual reports.

The Bank aims to hold investor meetings and conference calls in English in the first few days after the results presentation.

Deviations from section 3.6 of the Code of Practice for IR: None

3.7 Financial calendar

SpareBank 1 Østlandet's financial calendar provides a list of dates for financial reporting, dates of Supervisory Board meetings and dividend payments.

The Bank has a defined silent period from the fifth banking day in a new quarter until the quarterly report is published. During this period, there will be essentially no contact between Investor Relations and the press, investors, analysts or other market participants.

Deviations from section 3.7 of the Code of Practice for IR: None

3.8 Contact details

The bank's spokespersons for investors and analysts are the CEO, the CFO and defined IR resources. They are also referred to on the bank's investor relations page.

Deviations from section 3.8 of the Code of Practice for IR: None

4. COMMUNICATION USING OTHER CHANNELS

4.1 Social media

SpareBank 1 Østlandet generally states that social media should not be used to distribute financial information. Where social media are used to follow up financial information that has already been announced, this should be done in a careful and balanced tone and in a way which is not liable to mislead. Notifiable information must always be published in accordance with applicable regulations prior to being published in social media or via other channels.

Deviations from section 4.1 of the Code of Practice for IR: None

4.2 Contacts with analysts and equity research

The Bank attaches great importance to correct, relevant and timely information on the Bank's performance and earnings, creating trust vis-à-vis the market. Price sensitive information from the Bank must reach all market participants at the same time.

The Bank must not provide analysts with inside information, nor is it permissible to provide any such information in advance of publication against an undertaking not to use the information prior to publication. The Bank must also exercise caution in terms of the information it communicates and must ensure that it does not communicate information that taken together could be of material importance and thus give the analyst an advantage.

Joint presentations are arranged for all analysts, and all analyst conferences should be open. Information to analysts is made available to all interested parties via the company's website.

The bank does not comment directly on estimates and analyses. If the company thinks that the forecasts of analysts or the market as a whole are too high or too low and it wishes to draw attention to this, this must take the form of a stock exchange announcement. It is, however, acceptable to point out concrete factual errors in relation to matters that the company itself has previously disclosed where these have been used for research and estimates.

SpareBank 1 Østlandet should be cautious about distributing or publishing analysts' reports.

Analysts who follow the Bank are listed on the investor relation pages under "Equity certificate", "Analysts".

Deviations from section 4.2 of the Code of Practice for IR: None