

Equal Opportunities and Diversity

Reporting in line with the activity and
reporting obligation (ARP) for 2022



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1 Status of gender equality

1.1 Gender balance in the business

Gender distribution	2022	2021	2020	2019
Percentage of women	49.7%	51.6%	51.9%	52%
Proportion of female managers	41%	42.2%	36.1%	35.8%
Proportion of women on the Board of Directors	50%	50%	50%	50%
Proportion of women in Group Management	40%	40%	30%	30%

We have 740 permanent employees in the Bank, 49.7 per cent of whom are women. We have eight temporary employees, of which four are women and four are men. In addition to this, the Bank employs temporary workers hired in from staffing agencies to replace employees who are on leave, away sick, etc.

The proportion of women in management positions with personnel responsibilities decreased slightly from 42.2 per cent in 2021 to 41 per cent in 2022. This is still slightly below the 45 per cent target. The proportion of women in the CEO's management team remains unchanged; Group Management consists of four women and six men. The Bank's Board of Directors consists of four women and four men.

1.2 Full-time and part-time by gender

Age	Part-time		Full-time		Total
	Women	Men	Women	Men	
> 30	3	.	37	33	73
30-39	6	2	67	91	166
40-49	11	1	72	75	159
50-59	11	1	98	93	203
> 60	8	5	55	71	139
Total	39	9	329	363	740

Of the 740 permanent employees, 93 per cent work full time and 7 per cent part time. The part-time employees comprise nine men and 39 women. Most applied for a reduced time position themselves due to care obligations, age or capacity for work. At the end of 2021 start of 2022, we investigated the incidence of unwanted part-time work among those who have not applied for it themselves. The results show that we did not have any unwanted part-time work in SpareBank 1 Østlandet at that time.

1.3 Salary by gender and employment groups

Women's average salary as a percentage of men's average salary	2022	2021	2020	2019
Managers and more demanding professional positions	97.8%	98.9%	104.3%	93.3%
Line functions/operational positions	92.1%	88.6%	89.6%	90.6%
Customer adviser	97.4%	97.6%	98.1%	96.9%
Financial adviser	94.8%	94.8%	95.4%	93.6%
Business adviser	92.4%	89.8%	90.0%	91.6%
Total	83.6%	82.1%	81.2%	80.2%

Among employees in management positions and more demanding technical positions, women's pay was 97.8 per cent of men's pay at the end of 2022, compared with 98.9 per cent in 2021. In operational positions, which include advisers, case officers and so on, women's pay was 92.1 per cent of men's pay at year end 2022, compared with 88.6 per cent in 2021.

If we take a closer look at some of the operational positions, such as customer advisers, financial advisers and business advisers, women's pay is still lower than men's pay. The biggest difference between women and men is among business advisers, where women earn 92.4 per cent of what men earn. Previous analyses show that we have a gender-divided internal labour market. We have a concentration of men in the highest paid job categories, and a preponderance of women in the lowest paid job categories. If we look at all job categories together, the pay differences therefore increase. The sum of all women's wages will then be lower than the sum of all men's wages. Women's wages are 83.6% of men's wages.

The Bank uses external position assessment systems (HAY) to classify position categories and analyse salary data. The analyses are not adjusted for any structural factors related to age, seniority, level of education, deliveries, etc.

More analysis and measures related to pay and gender are required. In connection with pay negotiations for 2023, the figures will be broken down by the individual position category and gender.

1.4 Parental leave

In the 2022 calendar year, 20 women and 12 men took parental leave. Women took an average of 21.3 weeks of parental leave and men 14.8 weeks, compared with an average of 14 weeks for both genders in 2021. The figure does not reflect the total leave taken per employee because the leave can span two calendar years. In 2022, two employees chose to leave while on parental leave.

1.5 Turnover and recruitment

The proportion who chooses to go to another employer is relatively stable. In 2022, it was 2.97 per cent among women and 2.02 per cent among men, compared with 2.7 per cent and 2.4 per cent, respectively, the year before.

In 2022, we hired far more men than women. Of the new external recruits in 2022, 30 per cent were women and 70 per cent men. This is an area that the Group must pay more attention to in 2023.

Number of positions advertised by gender and category

The Bank's goal is to achieve gender balance among applicants in all position categories and we are committed to avoiding discrimination of any kind in a recruitment context. In 2022, we advertised 133 positions compared with 99 in 2021. We had a total of 1 856 applicants, compared with 1 896 the year before. The gender differences were slightly smaller than the year before with 45.4 per cent female applicants, up from 42 per cent in 2021. The gender difference in applicant numbers was greatest in the management positions category, with 67 per cent men and 33 per cent women. The same tendency can be found specialist consultants, with 35 per cent men and 65 per cent women.

Position	Positions	Applicants	Men	Women
Total	133	1856	1 014 (54.6%)	839 (45.4%)
Managers	11	199	133 (67%)	66 (33%)
Business advisers	5	68	33 (49%)	34 (50%)
Financial advisers	36	606	346 (57%)	260 (43%)
Customer advisers	17	405	184 (45%)	221 (55%)
Specialist consultants	12	97	34 (35%)	63 (65%)

* Here, we only refer to the position categories we have the most of.

Percentage of applicants by age categories

Most applicants are in the younger age categories. The number of applicants decreases from the 41-45 age group and up.

Year	< 21	21-25	26-30	31-35	36-40	41-45	46-50	51-55	56-60	61-65	> 65	unknown
2022	4	396	458	370	213	184	87	82	40	8	1	3
2021		450	591	352	169	124	92	84	49	13		13

2 Our work on equal opportunities and against discrimination

2.1 Principles, procedures and standards for equal opportunities and against discrimination

Through its equal opportunities and diversity policy, SpareBank 1 Østlandet has committed to respecting human rights and working actively on diversity and equal opportunities, both in our own business and with respect to customers and suppliers.

Gender balance is important to the company, in both management and other roles, and we have a goal of increasing the proportion of female managers from 40 to 45 per cent. Equal pay for work of equal value must be assessed and practised as far as possible based on objective criteria.

In our recruitment policy, we are committed to avoiding discrimination of any kind, such as in relation to gender, parental leave for childbirth, adoption, care obligations, ethnicity, religion, life stance, disability, sexual orientation, gender identity, gender expression, age, political views and union membership. We must also facilitate internal mobility.

In our Code of Conduct we have zero tolerance for discrimination, bullying and harassment, including unwanted sexual attention and purchasing sexual services. Employees must treat all of their colleagues with respect and never exceed the boundaries of acceptable behaviour.

Our goal is for employees to experience professional and personal development through different phases of their careers and enjoy a balanced relationship between their working life and personal life. The individual employee's opportunities for professional and personal development must be independent of gender, age, education, background and origin.

2.2 How we work to ensure equal opportunities and non-discrimination in practice

Equal opportunities, diversity and non-discrimination work are well integrated into daily operations. This is evident in practice in our work on recruitment, salary assessments, leaves of absence, employee surveys and sick leave. Our equal opportunities work is also rooted in the company's various strategies, tools and guidelines.

Surveys and analysis

- HR conducts an annual assessment of risks and obstacles to equal opportunities in collaboration with employee representatives (multipartite committee).
- Each year, HR analyses gender distribution and wage differences at different job levels, gender differences, part-time and temporary work as well as parental leave. In addition, we look at gender differences in recruitment, the proportion of female applicants and the proportion of applicants by age.

- HR investigates involuntarily part-time work through its own survey.

Analysing causes

HR analyses findings in surveys. In addition, we assess the causes of risks and decide on measures in collaboration with employee representatives (multipartite committee).

Initiate measures

The organisation implements various measures based on surveys and risk assessments. The measures are discussed in a multipartite committee. Significant measures and goals for the work are anchored in Group Management.

Evaluate the results of the work

The work carried out is evaluated through annual analyses and risk assessments. Equal opportunities work is also assessed in connection with an annual risk analysis in collaboration with employee representatives.

An overview of measures that have been integrated into daily operations, and measures that were implemented in 2022 as a result of an actual situation, as well as risk mapping and analyses in the autumn of 2021, is provided below.

2.3 Pay and working conditions

All employees shall have equal opportunities for salary development, including while on parental leave.

The following measures have been implemented as part of daily operations:

- Local salary supplements are made on the basis of an assessment of individual performance and contributions to the collective achievement of results over time. These processes involve a particular focus on identifying any equal pay disparities.
- To ensure objectivity, the Bank uses external position assessment systems (HAY) to classify work of equal value in job categories and analyse salary data.
- To prevent wage disparities arising between women and men, we have introduced an automatic collective wage agreement adjustment for employees who return to work after at least 5 months of parental leave.
- All employees retain their salary in excess of 6G when on parental leave, regardless of gender.

Measures implemented in 2022

- An analysis of involuntary part-time work was conducted in December 2022. The results showed there was no involuntary part-time work.
- Some employees have been granted an application for part-time work as a result of care obligations, disabilities, illness or age.
- HR has conducted analyses of pay in order to uncover any disparities.

SpareBank 1 Østlandet has very few part-time positions, which can be a limiting factor for including people with disabilities. We are in the process of considering an increase in the use of part-time work to include employees with disabilities. The work will be completed in 2023. Local pay negotiations will be conducted in 2023. New analyses of pay and gender will be conducted before the negotiations.

2.4 Recruitment

In recruitment processes, the goal is to ensure a professional process to increase accuracy, prevent discrimination of any kind and avoid sources of error.

The following measures have been implemented as part of daily operations:

- All recruiters have documented competence corresponding to DNV's certification for recruitment personnel. This will ensure a professional recruitment processes in accordance with scientific standards and legal requirements.

- We encourage the underrepresented gender to apply in job categories or environments where there is a skewed gender balance.
- Written recommendations for candidates of both genders are always presented when recruiting for managerial positions.

Measures implemented in 2022

- Survey of gender distribution of applicants for various positions.
- More active use of job advertisements to encourage the underrepresented gender to apply in job categories or environments where there is a skewed gender balance.

Applicant statistics from 2022 show that the gender differences between applicants shrank from 2021 to 2022. At the same time, we can also see that we do not have a good enough gender balance and diversity of applicants for certain position categories. In 2023, we will continue the work of reviewing text, image use and job advertisements to assess how this appeals to different groups in society. The purpose is to ensure an increased diversity of applicants.

In our recruitment work, skills and documented deliveries are the main criteria for employment.

2.5 Promotion and development opportunities

The Group's strategy highlights skilled employees as our most important resource. We therefore have several measures to ensure equal opportunities for professional and personal development.

The following measures have been implemented as part of daily operations:

- All employees are followed up through annual performance reviews and follow-up interviews, and our goal is for 90 per cent of all employees to have a development plan.
- Grants for master's programmes, as well as financial support for education and development measures.
- Collectively negotiated schemes to spend some work time on study ('Lesefri' - reading leave) in connection with studies.
- In recruitment processes, an internal advertisement is used if the position can be filled by internal resources. Permanent employees are given priority over external ones if there are no significant differences in relation to the competence requirements for the position.
- Adviser academy, management school and annual refresher courses (FinAut).
- Career development interviews.

Measures implemented in 2022

- Completion of the management development programme 'Ta Sats', which is specifically aimed at women.
- In 2022, 26 employees completed a master's programme in digital transformation in the financial services industry, and seven employees took other master's programmes.
- In 2022, each employee completed an average of 63.4 hours of internal and external training.
- We have increased internal mobility. 44 employees have changed positions or place of work.

2.6 Inclusion and facilitation

The Bank has extensive welfare schemes to ensure facilitation in the event of particularly burdensome care obligations, illness and disability.

We have the following measures as part of daily operations:

- The line manager can grant 5 days of paid leave, the Executive Vice President HR and Legal can grant an additional 5 days of paid leave per year.
- Flexible working hours and use of working from home.
- Opportunity for support conversations with the occupational health service for particularly burdensome care obligations.

- Extended right to self-certification days (up to 8 days of self-certification leave per employer period, limited to 24 calendar days during an individual 12-month period).
- Treatment insurance that ensures rapid diagnosis, specialist medical help, surgery/treatment, physiotherapy or psychological help.
- All employees are offered extended health checks and follow-up.
- All employees receive a workplace assessment when needed and adaptation of equipment.
- In the event of disability, we have the option of physical adaptation. Among other things, we have adapted workplaces and meeting rooms for people with hearing impairments.
- The occupational health service is actively used as a sparring partner for managers and employees in a preventive and repair perspective in the event of life crises, health challenges or illness.
- Facilitation during pregnancy to stay in work as long as possible.
- Extensive facilitation and work testing in the event of sick leave.

Measures implemented in 2022

The risk assessment for 2021 revealed a lack of resources/time for systematic work on integration and work training for external parties who find themselves outside the labour market. This was also true for 2022. In 2022, we had:

- Two participants from 'hurtigspor på Hedmarken' ['fast track in Hedmark'].
- One person on work experience from NAV.

In 2023, we decided to welcome refugees from Ukraine for language training, if there is a need and they have a professional banking or economics background.

2.7 Opportunities to combine work and family life

As far as possible, the Bank facilitates the opportunity to combine work and family life.

We have implemented the following measures in addition to statutory rights to leave, reduced positions, etc.:

- Flexible working time solutions.
- The opportunity to work from home.
- Shorter working hours in the summer.
- From the age of 64, full-time employees are entitled to one hour less daily working hours. (During the summertime period, full-time employees are entitled to a 30-minute shorter working day).

Measures implemented in 2022

- Evaluated and continued scheme for contractual working from home.

2.8 Harassment, sexual harassment and gender-based violence

In our Code of Conduct, we have enshrined zero tolerance for any form of harassment.

We have implemented the following measures to secure the profession handling of harassment, sexual harassment and gender-based violence:

- All employees participate in an annual 'Ethics Week' where, among other things, the Code of Conduct is reviewed and signed. From 2023, the ethics training will be more continuous with regular 'ethics refreshers' that ensure a focus on various topics throughout the year.
- Annual employee surveys are conducted with separate questions about bullying and harassment.
- We have our own procedures to ensure a low threshold for reporting concerns in the event of witnessing or experiencing harassment.
- We have procedures and a system that ensures the possibility of anonymous notification internally and externally.

- If we discover or uncover harassment internally, further investigations are carried out. If necessary, the occupational health service will also conduct investigations.
- Employees who experience or are accused of harassment are offered support interviews and guidance with an occupational health service or psychologist.
- Employees receive good help if violence is domestic violence is uncovered. They receive immediate access to professional assistance from the occupational health service and/or psychologist.
- Employees who are exposed to threatening customer behaviour are followed up by the security department and are offered support calls and assistance from the occupational health service.
- We conduct exercises on threatening customer behaviour to enable employees to deal with such situations.
- Security guards are employed in offices that are exposed to threatening customer behaviour.
- If necessary, the occupational health service is called in and debriefings and support interviews are carried out.

As far as harassment or gender-based violence (threatening customer behaviour) from customers are concerned, we also implemented the following measures in 2022:

- We have developed a game that provides training vis-à-vis demanding customer behaviour. We will start using this in 2023.
- In 2022, we have conducted four courses for new employees, temporary workers and others as needed. The topic was handling demanding and possibly threatening customer behaviour. The course includes how to handle alarms and report incidents.

We are not aware of any gender-based violence in the workplace among colleagues. We have identified individual cases of persons who feel exposed to bullying and/or harassment through investigations and reports of concern. Special procedures ensure professional management of the various instances, both for the affected parties and the working environment. We occasionally (not annually) have cases of domestic violence. When these are discovered, the affected parties are ensured professional external assistance.

In autumn 2022, we introduced weekly working environment check-ups. Over the course of a year, this will provide a better overview of any cases of bullying and harassment than previous employee surveys that were conducted once a year.

In 2022, we had a plan to conduct training related to managing bullying, harassment and gender-based violence. This was not conducted and will be reassessed in 2023 in connection with the revision of reporting routines and the introduction of a new system for employee surveys.

2.9 Summary of risk assessment December 2022

2022 ended with a new risk assessment, which was completed in January 2023. The table below presents the risks requiring further work and those requiring monitoring in 2023.

Risks requiring further work (red zone).

- Gender-based pay disparities.
- We will continue the work to attract a diverse range of employees.
- Being unable to include employees with physical disabilities.

Risks requiring monitoring (yellow zone).

- Lack of resources/time for systematic work on inclusion, equal opportunities and diversity.
- Care obligations contributing to an unequal distribution of women and men in senior positions.
- Exclusion due to a lack of skills/being unable to keep up.
- Competence measures beyond what is suitable for the current job not being sufficiently prioritised.
- We hire more men than women.