



PILLAR 3 2024

1	INTRODUCTION
2	THE GROUP'S RISK AND CAPITAL MANAGEMENT
3	CAPITAL
4	CREDIT RISK
5	COUNTERPARTY RISK
6	LIQUIDITY RISK
7	MARKET RISK
8.	OPERATIONAL RISK
9	ESG RISK
10	OWNERSHIP RISK
11	COMPLIANCE RISK
12	CONDUCT RISK

Content

1	Introduction	3	4	Credit risk	18	9	ESG risk	37
1.1	Group risk statement	4	4.1	Management and control	18	9.1	Strategic objective and management processes	37
1.2	Confirmation from the Chief Risk Officer	5	4.2	Asset quality	19	9.2	Risk management	37
1.3	Key risk groups	5	4.3	CRM techniques	20	9.3	Standards	38
			4.4	Use of external ratings under the standard method	21	9.4	Tools	38
			4.5	IRB approach	21	9.5	Roles and responsibilities	38
			4.6	Portfolio information	26			
2	The Group's risk and capital management	7	5	Counterparty risk	27	10	Ownership risk	39
2.1	Purpose	7	5.1	Management and control	27	10.1	Exposure	39
2.2	Management and supervision structure	7	5.2	Portfolio information	27	10.2	Management and control	39
2.3	Key roles and areas of responsibility	7						
2.4	Decision-making structures	8	6	Liquidity risk	28	11	Compliance risk	40
2.5	Framework for risk and capital management	9	6.1	Management and control	28	11.1	Management and control	40
			6.2	Exposure	30	11.2	Regulatory changes and compliance risk	40
			7	Market risk	32	12	Conduct risk	41
			7.1	Management and control	32	12.1	Management and control	41
			7.2	Portfolio information	34			
			8.	Operational risk	35			
			8.1	Management and control	35			
			8.2	Minimum eligible capital requirement	36			

- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
- 7 MARKET RISK
- 8. OPERATIONAL RISK
- 9 ESG RISK
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

1 Introduction

Pillar 3 is a regulatory requirement for the disclosure of information about capital and risk conditions. This document, including the appendix containing standardised forms, the annual report, and quarterly reports and associated documentation, describes SpareBank 1 Østlandet's risk and capital management and is intended to satisfy the requirements concerning the public disclosure of financial information as stipulated in the applicable regulations.

This document is updated annually. If, however, there are significant changes that have an impact on the assessment of the Group's financial standing, then the document will be updated with new information. Standardised forms in attachments are updated at the recommended frequency for each form. Periodic information on the capital adequacy ratio and the minimum eligible capital requirement is available in the Group's quarterly reports. All figures are stated in NOK million unless otherwise stated.

Beyond the information available in this document with attachments, we refer to About us/Investor on SpareBank 1 Østlandet's [website](#).



1 INTRODUCTION

▶ Group risk statement

Confirmation from the Chief Risk Officer

Key risk groups

2 THE GROUP'S RISK AND CAPITAL MANAGEMENT

3 CAPITAL

4 CREDIT RISK

5 COUNTERPARTY RISK

6 LIQUIDITY RISK

7 MARKET RISK

8. OPERATIONAL RISK

9 ESG RISK

10 OWNERSHIP RISK

11 COMPLIANCE RISK

12 CONDUCT RISK

1.1 Group risk statement

The Board of Directors of SpareBank 1 Østlandet has decided that the Group should have a moderate to low risk profile and is kept informed of developments in the Group's risk through regular reports. In the opinion of the Group, the risk management framework is adequate and well suited to the Group's risk appetite and business strategy. It also believes that the level of risk is commensurate with the established risk profile.

As far as material intragroup transactions and transactions with related parties are concerned, please refer to the notes in the annual financial statements vis-à-vis investments in subsidiaries, associated companies and joint ventures, as well as the notes regarding personnel costs and benefits for senior executives and employee representatives.

The Group's Board of Directors has approved this risk statement.

FIG. 1.1 Development in risk-weighted assets
NOK millions

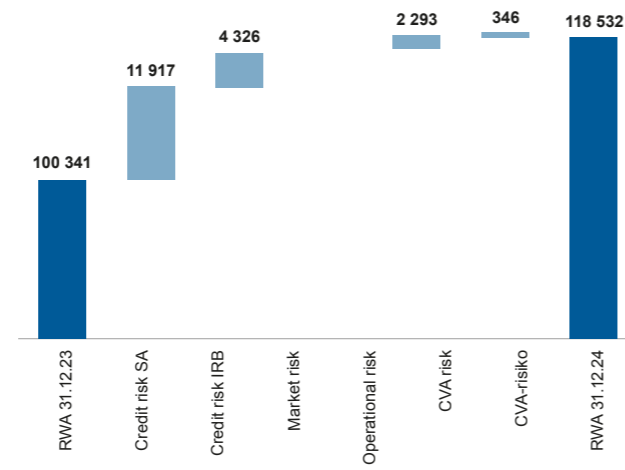


TABLE 1 Key metrics

Profitability	
Return on equity after tax	15,8%
Capital	
CET1 capital ratio	16.8%
Leverage ratio	7.3%
Rating	Aa3
Liquidity	
LCR	172.2%
NSFR	123.1%
Deposit coverage including the covered bond companies	55.5%
Credit risk	
Risk weights in the IRB portfolio retail market	29.5%
Risk weights in the IRB portfolio corporate market	59.6%
Lending growth in parent bank	5.4%
ESG risk	
Rating (Sustainalytics)	Low risk
Green bond issuances as a proportion of total balance sheet	8.9%
RM: Loans eligible for the green bond framework	22.3%
Corporate market: Loans eligible for the green bond framework	18.1%

1 INTRODUCTION

Group risk statement

► Confirmation from the Chief Risk Officer

Key risk groups

2 THE GROUP'S RISK AND CAPITAL MANAGEMENT

3 CAPITAL

4 CREDIT RISK

5 COUNTERPARTY RISK

6 LIQUIDITY RISK

7 MARKET RISK

8. OPERATIONAL RISK

9 ESG RISK

10 OWNERSHIP RISK

11 COMPLIANCE RISK

12 CONDUCT RISK

FIG. 1.2 Kapitaldekning
Per cent

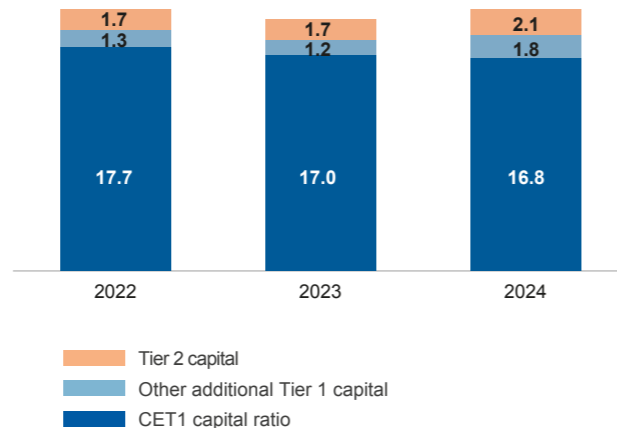
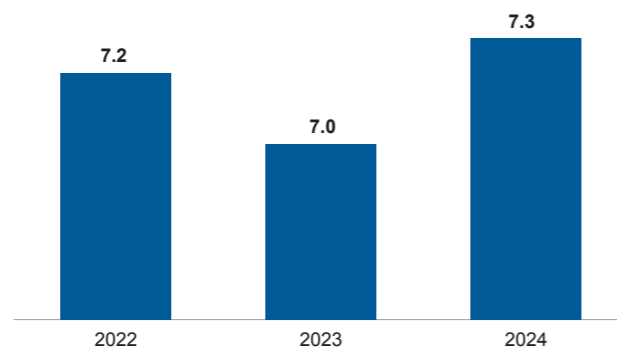


FIG. 1.3 Leverage ratio
Per cent



1.2 Confirmation from the Chief Risk Officer

I hereby confirm that the Group's Pillar 3 documentation as at 31 December 2024 is prepared in accordance with the disclosure requirements described in Part Eight of the Regulation (EU) 2019/876 of the European Parliament and of the Council of 20 May 2019 and that the information provides a true and fair picture of the Group's capital and risk situation. In accordance with internal guidelines, the Pillar 3 process documentation is owned by the Chief Risk Officer (CRO). The documentation is considered by the Board's Risk Committee before being approved and adopted by the Board of Directors.

For an assessment of the main risk areas associated with the Group's business model and how these risks are managed, please see the descriptions of the individual risk areas in the separate chapters in this document.

Vidar Nordheim
Chief Risk Officer (CRO)

1.3 Key risk groups

The Group is exposed to a variety of risks where the main risk groups are:

- **System risk** is the risk that financial instability will disrupt the provision of financial services to an extent that can lead to significant negative effects on production and employment.
- **Credit risk** is the risk of losses resulting from a customer's or other counterparty's inability or unwillingness to fulfil its obligations.
- **Market risk** is the risk of losses due to changes in observable market prices, such as interest rates, share prices or currency rates.
- **Liquidity and refinancing risk** is the risk of being unable to fulfil obligations or finance assets, including desired growth, without significant extra costs.
- **Operational risk** is the risk of losses due to weak or inadequate internal processes or systems, human error or external incidents.
- **Reputation risk** is the risk of a failure in earnings and access to capital due to failing confidence in the market, i.e. customers, counterparties, stock market and authorities.
- **Ownership risk** is risk that the Group will suffer negative results from stakes in strategically owned companies and/or the need to inject fresh capital into these companies.
- **Sustainability risk (ESG risk)** is defined as the risk of loss due to the Group's exposure to counterparties being adversely impacted by ESG factors. The Bank assesses counterparty risk in relation to environmental, social and governance risks.
 - a) **Environmental risk (E)** is the risk of loss as a result of the Group's exposure to counterparties being adversely affected by environmental factors, including climate change/changes in nature, and changes in regulations and consumption habits due to the transition to a zero emissions society.
 - b) **Social risk (S)** is the risk of loss due to the Group's exposure to counterparties being adversely impacted by social conditions, labour rights, human rights, poverty, etc.
 - c) **Governance risk (G)** is the risk of loss due to the Group's exposure to counterparties being adversely impacted by poor corporate governance of the counterparty.

1 INTRODUCTION

Group risk statement

► Confirmation from the Chief Risk Officer

Key risk groups

2 THE GROUP'S RISK AND CAPITAL MANAGEMENT

3 CAPITAL

4 CREDIT RISK

5 COUNTERPARTY RISK

6 LIQUIDITY RISK

7 MARKET RISK

8. OPERATIONAL RISK

9 ESG RISK

10 OWNERSHIP RISK

11 COMPLIANCE RISK

12 CONDUCT RISK

- **Compliance risk** is the risk that the Group will incur public sanctions/penalties, financial losses or a damaged reputation as a result of a failure to comply with laws, regulations or guidelines from the authorities.
- **Anti-money laundering risk** is the risk of the Bank's products and services being abused for money laundering or terrorist financing.
- **Conduct risk** is the risk of loss of licence, other public sanctions or criminal sanctions, loss of reputation or financial loss as a consequence of the Bank's business methods or the employees' conduct materially jeopardising customers' interests or the integrity of the market.
- **Regulatory risk** is the risk that changes to the regulatory framework significantly affect the Bank's profitability, capital requirements or framework conditions in a negative way.
- **Risk of unjustifiable debt build-up** is the risk that the Group's financial strength will be disproportionately reduced due to a high proportion of external funding and excessive debt build-up.
- **Business risk** is the risk associated with unexpected income and cost fluctuations due to factors other than credit risk, market risk, and operational risk.
- **Pension risk** is the risk of losses as a result of the Bank's pension scheme being underfunded in relation to future liabilities and as a result that pension capital must be increased.



1 INTRODUCTION

2 THE GROUP'S RISK AND CAPITAL MANAGEMENT

▶ Purpose

Management and supervision structure

Key roles and areas of responsibility

Decision-making structures

Framework for risk and capital management

3 CAPITAL

4 CREDIT RISK

5 COUNTERPARTY RISK

6 LIQUIDITY RISK

7 MARKET RISK

8. OPERATIONAL RISK

9 ESG RISK

10 OWNERSHIP RISK

11 COMPLIANCE RISK

12 CONDUCT RISK

2 The Group's risk and capital management

2.1 Purpose

The Group's risk and capital management shall support the Group's strategic development and goal fulfilment and contribute to the maintenance of the desired risk profile. Risk and capital management shall also help to ensure financial stability and satisfactory asset management. This shall be achieved by:

- A clear corporate culture characterised by a high awareness of risk and capital management.
- A good understanding of the risks driving earnings.
- Striving for good use of capital.
- Avoiding unexpected negative events seriously harming the Group's financial status and/ reputation.

The framework for determining the Group's risk tolerance shall provide a holistic and balanced overview of the risk that the business is exposed to, and consists of statements that define the Group's risk tolerance.

Based on the statements defining the Group's risk tolerance, the risk profile is quantified through the determination of measurement indicators for the Group's risk appetite and risk capacity. Risk appetite is defined as the desired risk exposure/profile from an earnings and loss perspective. Risk capacity is defined as maximum risk exposure before the Group conflicts with regulatory requirements or is forced to take undesired measures, including undesired changes in strategy or business model.

Targeted risk profile shall be reflected in other parts of the risk management framework, including, for example, the determination of authorisations and frameworks for operational management.

2.2 Management and supervision structure

Management and supervision comprise all the processes and control measures that have been introduced and implemented by the Bank's management to ensure efficient operations and the implementation of the Group's strategies.

In the process for risk management, corporate culture is the foundation that the other elements build on. Corporate culture encompasses management philosophy, management style, governing principles and the people in the organisation with their individual characteristics, such as integrity, core values and ethical attitudes. A good corporate culture is important because, without it, it can be difficult to compensate with other control and management measures.

We have established clearly defined core values and a code of conduct, which have been clearly communicated and presented throughout the organisation. These guidelines provide information about the expectations of individual employees in terms of integrity, ethical behaviour and competence.

The recruitment of new employees considers professional and personal suitability in relation to the position to be a prerequisite.

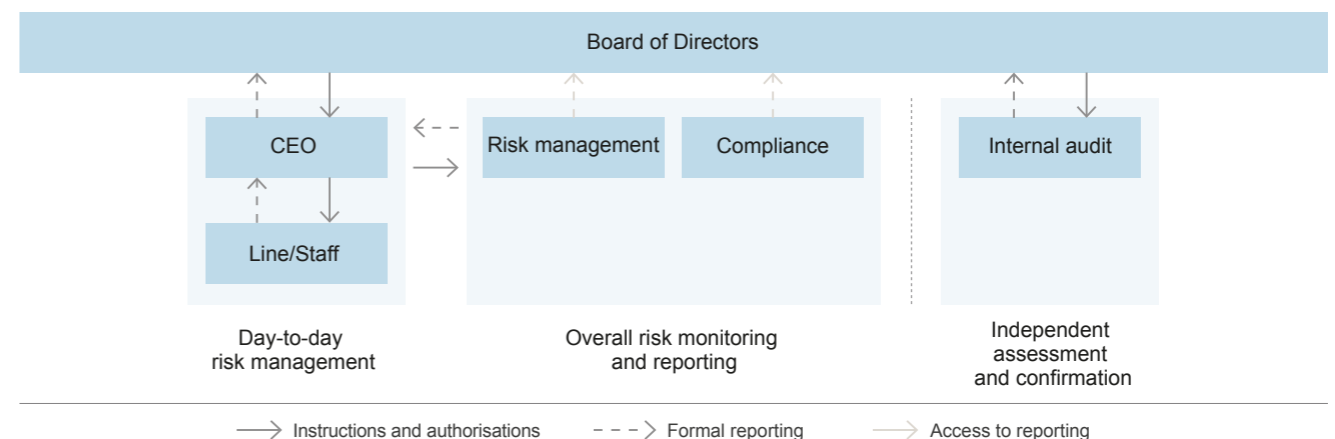
All the Group's business areas and staff functions are represented in Group Management. For all key areas of the Group there shall be clearly established responsibilities.

2.3 Key roles and areas of responsibility

The Group attaches importance to having a supervisory and management structure that promotes targeted and independent management and control. Responsibility for risk management has therefore been divided between different roles in accordance with Figure 2.1.

The Board is responsible for ensuring that the Group has adequate eligible capital based on the strategic objectives, adopted risk profile and regulatory requirements. The Board stipulates the overall objectives with respect to the risk profile and return. The Board also stipulates the overall limits, authorisations and guidelines for risk and capital management in the Group, as well as the ethical guidelines that shall contribute to a high ethical standard. Furthermore, the Board shall ensure that Group Management provides an appropriate and effective risk management process in accordance with the laws, regulations, statutes and principles outlined in this document, as well as determining contingency and continuity plans to ensure that operations can continue,

FIG. 2.1 Responsibilities and roles in the risk management process



1 INTRODUCTION**2 THE GROUP'S RISK AND CAPITAL MANAGEMENT**

Purpose

Management and supervision structure

Key roles and areas of responsibility

► Decision-making structures

Framework for risk and capital management

3 CAPITAL**4 CREDIT RISK****5 COUNTERPARTY RISK****6 LIQUIDITY RISK****7 MARKET RISK****8. OPERATIONAL RISK****9 ESG RISK****10 OWNERSHIP RISK****11 COMPLIANCE RISK****12 CONDUCT RISK**

and losses are limited in the event of significant unforeseen incidents.

The Board's tasks are set out in an annual plan, which is revised annually. This ensures that the Board of Directors has adequate time to focus on its key duties.

The Board has its own committees for risk management, audits and remuneration. The Risk Committee is a preparatory body for the Board in cases involving the Group's risk management and internal control, while the Audit Committee prepares cases that involve financial information and internal control associated with this. The committees consist of the same three members of the Board, although the committees do not have the same chair. The Remuneration Committee has an advisory responsibility to the Board regarding the determination and follow-up of remuneration policy applicable to all employees and shall correspondingly assist the Board with matters concerning the Group CEO's terms of employment, as well as matters concerning the general principles and strategy for the remuneration of the senior executive personnel in the Group. The Remuneration Committee consists of three board members, one of which is an employee representative. The Risk Committee, Audit Committee and Remuneration Committee held seven, five and six meetings, respectively, during the reporting period.

For information regarding the election of board members and the composition of the Board, please refer to the Group's corporate governance principles, which are

available on the Group's website. Table 2.1 shows the number of board positions each board member holds in other organisations.

The Group CEO is responsible for the overall risk management. This means that the Group CEO is responsible for the implementation of efficient risk management systems in the Group and the monitoring of the risk exposure. The Group CEO is also responsible for delegating authority and reporting to the Board of Directors. The 1st line (business divisions and staff units) is responsible for risk management within their areas of responsibility. This means that the managers should make sure that proper risk management is established and executed, and that it is performed in accordance with the management documents, authorisations, routines and instructions.

The 2nd line (Risk Management and Compliance Department) is organised independently of the line and staff units and reports directly to the Group CEO. The department is also able to report directly to the Board. The head of the department cannot be removed from office without the approval of the Board. The department is responsible for independent monitoring and reporting of the risk situation and for ensuring that the Group complies with the applicable laws and regulations. The department is divided into sections for risk management and compliance. The risk management department is responsible for the risk management framework, including risk models and risk management systems, while the compliance

department is responsible for the compliance and conduct risk framework. The head of compliance can report directly to the Board and the Group CEO, even though the department is co-organised with risk management. In the subsidiaries, a person or persons shall be appointed to handle responsibility for risk management and compliance in the respective company.

The 3rd line (internal audit) is the Board's means of ensuring that risk management is targeted, effective, and functioning as assumed.

2.4 Decision-making structures

The following committees have been established in the risk management area to assist the Group CEO with decision-making data and follow-up:

- Risk Management Committee
- Balance Sheet Management Committee
- Credit Committee

The Risk Management Committee and the Balance Sheet Management Committee have been established to ensure good, interdisciplinary management of a) risk and capital related questions and issues and b) risk and balance sheet related questions and issues, respectively. The committees deal with a number of issues that interface with each other, and annual timetables, meeting plans and participants must ensure adequate coordination where necessary. Both committees are advisory bodies for the Group CEO and must be composed of key executives from risk management and compliance, finance and business divisions.

The Risk Management Committee addressed issues concerning the risk categories to which the Bank is exposed, including:

- Discussing risk situations, risk tolerance, action options and action orientation in the event of an unwanted development in the risk picture.
- Discussing the potential consequences for the Bank of emerging risks.
- Assessing the impact of different scenarios on profitability and financial strength.
- Proposing changes to the Bank's risk tolerance.

TABLE 2.1 Board positions in other organisations

Name	Role in SpareBank 1 Østlandet	Number of board positions in other organisations
Siri Jarandsen Strømmevold (born 1961)	Chair of the Board	2
Nina Cecilie Strøm Swensson (born 1972)	Deputy chairman of the board	0
Alexander Sandberg Lund (born 1969)	Board member	3
Idun Kristine Fridtun (born 1963)	Board member	2
Jørn-Henning Eggum (born 1972)	Board member	4
Tore-Anstein Dobloug (born 1962)	Board member	1
Geir Stenseth (born 1965)	Board member	1
Sjur Smedstad (born 1966)	Board member	2
Catherine Norland (born 1972)	Board member	2

1 INTRODUCTION

2 THE GROUP'S RISK AND CAPITAL MANAGEMENT

Purpose

Management and supervision structure

Key roles and areas of responsibility

Decision-making structures

► Framework for risk and capital management

3 CAPITAL

4 CREDIT RISK

5 COUNTERPARTY RISK

6 LIQUIDITY RISK

7 MARKET RISK

8. OPERATIONAL RISK

9 ESG RISK

10 OWNERSHIP RISK

11 COMPLIANCE RISK

12 CONDUCT RISK

The Balance Sheet Management Committee is the Bank's highest advisory body for tactical and operational adjustments to the composition of the balance sheet within the framework established by the Board. The Balance Sheet Management Committee has a special responsibility for the funding side of the balance sheet, with a special focus on overall issues related to debt composition and liquidity risk. Fixed agenda items in Balance Sheet Management Committee meetings include:

- Discussing expected developments in profitability, capital adequacy, funding needs, the deposit coverage ratio, etc.
- Assessing the impact of different scenarios on profitability, financial strength, funding and liquidity as a basis for early interventions designed to ensure targets are met.

The Credit Committee is an advisory body for the Group CEO on credit decisions under the Group CEO's authority and must:

- Consider loan applications in accordance with current governing documents, appropriation rules and credit management routines.
- Identify risk in each application, including an independent assessment of credit risk.

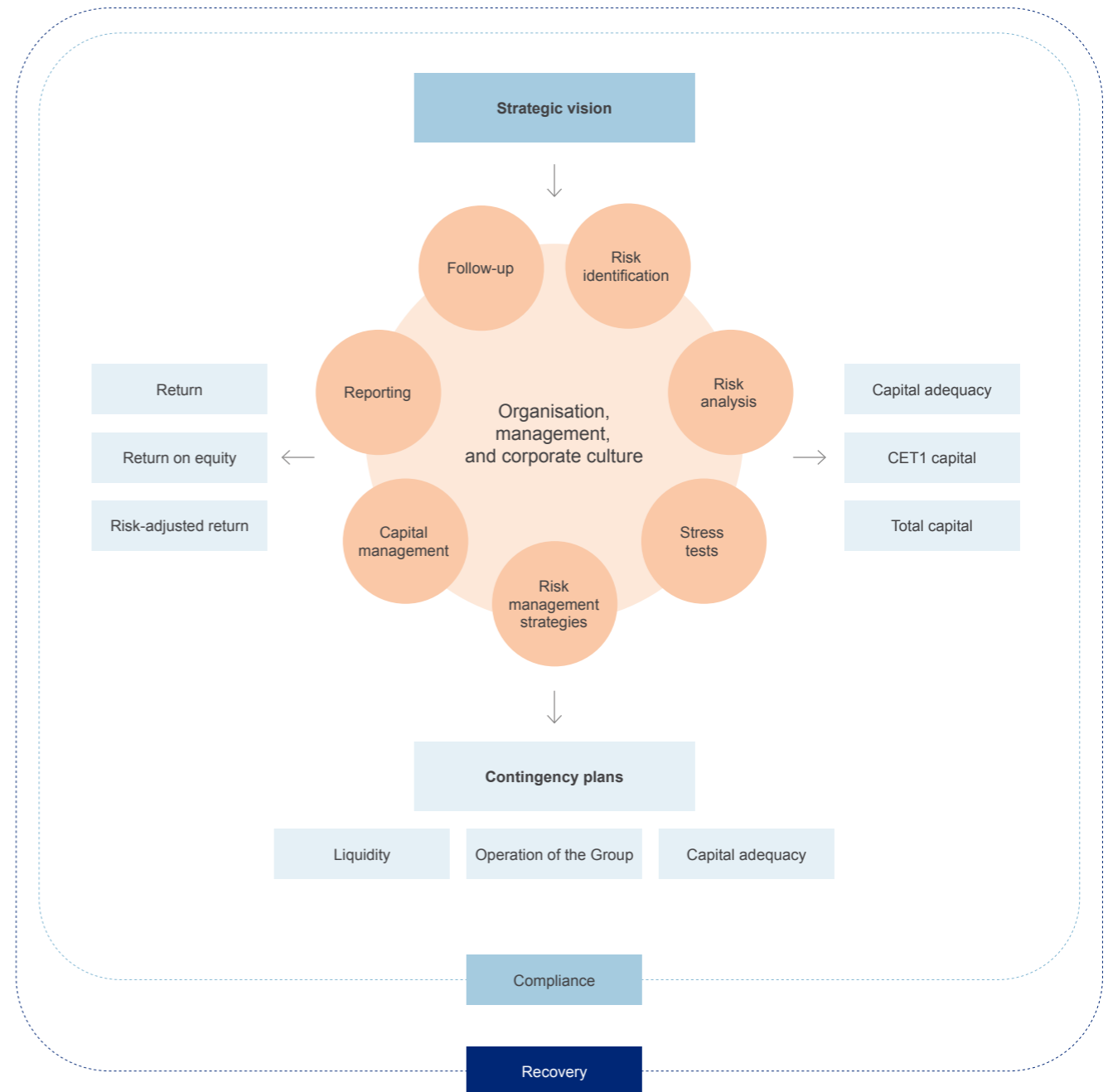
The Credit Committee is made up of the Group CEO, the Executive Vice President Corporate Market, the credit manager for the corporate market and the assistant bank manager for the corporate credit market. The regional bank manager and case officers participate in the processing of their cases.

2.5 Framework for risk and capital management

In order to ensure an effective and appropriate process for risk and capital management, the framework is based on the following elements, which reflect the way in which Group is managed by its Board of Directors and the Bank's Group Management:

- Strategic objective and desired risk profile.
- Organisation and corporate culture.
- Risk review.
- Risk analysis.
- Stress tests.

FIG. 2.2 Framework for risk and capital management



1 INTRODUCTION

2 THE GROUP'S RISK AND CAPITAL MANAGEMENT

Purpose

Management and supervision structure

Key roles and areas of responsibility

Decision-making structures

► Framework for risk and capital management

3 CAPITAL

4 CREDIT RISK

5 COUNTERPARTY RISK

6 LIQUIDITY RISK

7 MARKET RISK

8. OPERATIONAL RISK

9 ESG RISK

10 OWNERSHIP RISK

11 COMPLIANCE RISK

12 CONDUCT RISK

- Risk strategies.
- Capital management, including targets for returns and solvency.
- Reporting.
- Follow-up.
- Contingency plans.
- Compliance.
- Recovery plan.

The correlation between the individual elements can be summed up as in Figure 2.2.

2.5.1 STRATEGIC VISION

Risk and capital management shall be based on the Group's strategic objectives expressed in the business strategy and the desired risk profile, as this is determined in the Group's overall risk strategy and policy.

2.5.1.1 Risk identification

In order to realise the strategic objective and desired risk profile, the Board and Group Management shall be familiar with the risk pattern. The risk mapping process must be forward-looking and an integral part of the strategy process. The process shall cover all the significant risks the Group faces and shall be conducted at least once per year or more often when special conditions so indicate.

2.5.1.2 Risk analysis

The risk analysis shall form the basis for how the Group understands and controls the risks. Among other things, this means that:

- Significant risks shall to the maximum extent possible be quantified, where methods and models of quantification are based on proven methods for measuring risk.
- A review and documentation shall be undertaken of the control measures established and whether these measures are properly safeguarded.
- For significant risks, a risk profile shall be prepared that shall be quantified to the greatest extent possible.

2.5.1.3 Stress tests

Stress tests are essential tools for showing how negative events affect profit, the balance sheet, capital adequacy and liquidity. Stress tests shall be included as an important element in the Group's projection of financial development, including also projections related to a serious but not unlikely financial setback. Stress tests shall be carried out at least annually and used in the capital assessment

process and maintenance of the Group's recovery plan.

2.5.1.4 Risk strategies

The Group's overall risk strategy and policy describes the Group's accepted risk tolerance and policy for work on risk and capital management. The governing document has a number of underlying risk-based governing documents within all significant risk categories.

The document must be reviewed at least once per year and updated as necessary. Based on the review, the document shall be submitted to the Board for resolution.

The governing document applies to the Group but must be considered and adopted by each individual company's board. When implementing the strategy in the Bank's subsidiaries, the framework must be implemented to the greatest possible extent, taking into account the size and risk picture of the individual subsidiary. This can be achieved through establishing a separate risk management document based on the principles of the overall risk strategy and policy in such a way that all formal legal and regulatory requirements for the businesses are met.

The purpose of the document is to further define the Group's framework for management and control. The document provides guidelines for the Group's overall attitudes towards and principles for risk and capital management and shall ensure that effective and appropriate risk and capital management processes are established and maintained.

The framework must satisfy external requirements and expectations for good risk and capital management. This includes:

- Laws and regulations.
- The Financial Supervisory Authority of Norway's guidelines.
- Holistic risk management – an integral framework (COSO framework).
- The Norwegian Code of Practice for Corporate Governance.
- Guidelines on Internal Governance (EBA GL 2021/05)

The underlying risk strategies and policies are the Board's instruments for determining the desired risk profile in different areas of risk and ensuring that the risks are managed in line with this profile. The various governing

documents shall reflect overall targets and strategies given by the superordinate risk strategy and the Group's business strategy and shall be in relation to the Group's risk capacity and appetite. The underlying risk strategies and policies are determined by the Board and are revised as needed, and as a minimum once per year.

The Group's code of conduct functions as a guide by defining the ethical requirements that are set internally and how the Group shall relate to other stakeholders.

The Group's strategy for corporate social responsibility and sustainability describes the Group's opportunities and challenges in relation to corporate social responsibility and sustainability and how these issues are managed.

2.5.1.5 Capital management

The Group's capital management shall contribute to:

- Effective capital funding and application in relation to the strategic targets and adopted business strategy.
- A satisfactory return on equity.
- A satisfactory CET1 capital ratio in relation to the desired risk profile the requirements set by the authorities.
- Competitive terms and good long-term access to funding in capital markets.
- Utilisation of growth opportunities in defined market areas at any given time.

On the basis of the strategic objective and the results of the capital assessment process, a capital plan shall be prepared annually. As a minimum, two different projections of the Group's financial development for the next three years shall be used. These projections shall take into account expected developments in the period, as well as a situation with a serious but not unlikely economic downturn.

On the basis of the projections, the Board and Group Management shall carry out an overall assessment of whether the capital level is sufficient and adapted to the Group's risk profile and strategic objective.

The Group's objectives for CET1 capital ratio and total capital adequacy ratio shall ensure sufficient capital to comply with the capital requirements imposed by the authorities and safeguard the Group's creditors.

1 INTRODUCTION**2 THE GROUP'S RISK AND CAPITAL MANAGEMENT**

Purpose

Management and supervision structure

Key roles and areas of responsibility

Decision-making structures

Framework for risk and capital management

**3 CAPITAL****4 CREDIT RISK****5 COUNTERPARTY RISK****6 LIQUIDITY RISK****7 MARKET RISK****8. OPERATIONAL RISK****9 ESG RISK****10 OWNERSHIP RISK****11 COMPLIANCE RISK****12 CONDUCT RISK****2.5.1.6 Reporting**

The purpose of risk reporting is to ensure that all levels of the organisation have access to adequate and reliable risk reporting. This shall ensure an overview of current risk exposure and any weaknesses in the risk management process. The reporting shall form the basis for the further follow up and monitoring of risk exposure and the risk management process within the Group.

2.5.1.7 Follow up and monitoring

The ongoing risk exposure shall be monitored. All managers are responsible for the day-to-day risk management in their own areas of responsibility and thus the use of capital in their own areas of responsibility and they shall ensure that the risk exposure is within the approved limits.

The overall risk exposure and risk development are followed up through periodic risk reports to the Board and management. Overall risk monitoring and reporting are undertaken by the department for risk management and compliance. The purpose of the follow-up is to assess the effectiveness of the risk management process over time and ensure that necessary measures or changes are carried out.

The Group has established indicators with limit values for follow-up and monitoring. In this way, timely assessments of the need for escalation are ensured from negative development in one or more indicators.

2.5.1.8 Compliance

There shall be processes that ensure compliance with the applicable laws and regulations, so that the Group is not subject to sanctions or other financial loss resulting from breach of these. This shall be achieved by:

- Clearly defined core values and code of conduct, which have been clearly communicated and understood throughout the organisation.
- Guidelines and routines to detect, communicate and implement amendments to laws and regulations.
- Guidelines and routines to follow up and report compliance with laws and regulations.

2.5.1.9 Contingency plans

The Group's core business entails the acceptance of risk. Over time this may inflict large, unexpected losses on the banks, in spite of good risk management systems and

processes. Such a situation may entail serious pressure on capital adequacy, funding and operations. The Group must, therefore, have contingency plans for the aforementioned areas.

2.5.1.10 Recovery plan

In addition to ordinary contingency plans, the Group has established a separate recovery plan that specifies concrete, practical measures for managing financial crisis situations. The recovery plan should not predict financial crises; rather it should identify and assess the Group's opportunities to restore financial strength and viability in situations where the Group is under hard financial pressure.

2.6 REMUNERATION SCHEMES

The Group's remuneration policy is approved by the Board of Directors after prior consideration by the Remuneration Committee. Similarly, compliance with the remuneration scheme is reported annually to the Board after prior consideration by the Remuneration Committee. The Group's remuneration scheme is intended to help support and further develop the organisation's performance culture. However, the measurement of, and focus on, performance and sales must be balanced in relation to the principles for risk management, conflicts of interest and the interests of customers. Good performance is characterised by prioritisation and the implementation of strategic activities, the achievement of results that provide commercial value, a good learning culture, good collaboration and value creation across the Group.

The remuneration model for all employees in SpareBank 1 Østlandet is based on a fixed salary being the central and main component. This also applies for senior executives and employees with risk functions. This is done to prevent incentivising unwanted risk taking. No form of special remuneration schemes have been established for executive personnel, etc. No form of special remuneration arrangements have been established for senior executives, etc. Variable pay in the form of one-off supplements can be awarded to employees who have had extraordinary workloads over time, for example due to managing or participating in major and extensive projects, or some other form of extra work. As a general rule, one-off supplements as described above cannot be awarded to senior executives, employees with duties of material significance for the organisation's risk exposure and employees with

control tasks. Nevertheless, should one-off supplements still be awarded to senior executives, employees with duties of material significance for the organisation's risk exposure and employees with control tasks, this must be done in line with the rules of the Financial Institutions Regulations and circular 2/2020 issued by the Financial Supervisory Authority of Norway, and must be approved by the Board in each case. As a consequence of the structure, scope and actual distribution of one-off supplements, the provisions regarding withholding, distribution in the form of equity instruments, etc. are in practice not relevant. That is, the Group makes use of the exemption rules in Article 94 (3)(b) of CRD with regard to the provisions of Article 94 (1)(l)-(m) of CRD concerning the composition and postponement of variable remuneration, respectively. However, the remuneration scheme does contain formal provisions that allow withholding or demanding the repayment of awarded variable remuneration, should this still be relevant.

For further descriptions, please refer to the remuneration of senior executives report published on the Bank's website, as well as the appendix containing standardised forms, main group 17, which deals with remuneration schemes.

1 INTRODUCTION

2 THE GROUP'S RISK AND CAPITAL MANAGEMENT

3 CAPITAL

▶ Capital adequacy regulations

Differences between accounting and capital adequacy consolidation

Regulatory alignment

The Group's capital adequacy targets

Regulatory capital

4 CREDIT RISK

5 COUNTERPARTY RISK

6 LIQUIDITY RISK

7 MARKET RISK

8. OPERATIONAL RISK

9 ESG RISK

10 OWNERSHIP RISK

11 COMPLIANCE RISK

12 CONDUCT RISK

3 Capital

3.1 Capital adequacy regulations

The capital adequacy regulations are based on a standard for calculating capital adequacy where the purpose is to reinforce the stability of the financial system through the following instruments:

- Risk sensitive capital requirements.
- Regulatory requirements for risk management and control.
- Supervisory follow-up.
- Information to the market.

The regulations are intended to ensure there is agreement between how the authorities stipulate capital adequacy requirements for institutions and the approaches the institutions use to calculate and evaluate their capital requirements. The regulations are based on the following three pillars:

- Pillar 1: Minimum eligible capital requirement.
- Pillar 2: Evaluation of the overall capital requirements and supervisory follow-up.
- Pillar 3: Public disclosure of information.

3.1.1 PILLAR 1 – MINIMUM ELIGIBLE CAPITAL REQUIREMENT

Pillar 1 concerns the minimum eligible capital requirement for credit risk, operational risk and market risk, for which the minimum capital adequacy ratio requirement has been set at 8 per cent. In addition to this comes a total buffer requirement of 9.5 per cent at the end of the year. SpareBank 1 Østlandet has not been defined as a nationally systemically important bank.

Capital adequacy is defined as the relationship between the Bank's total eligible capital and its risk-weighted assets, as shown in Figure 3.1.

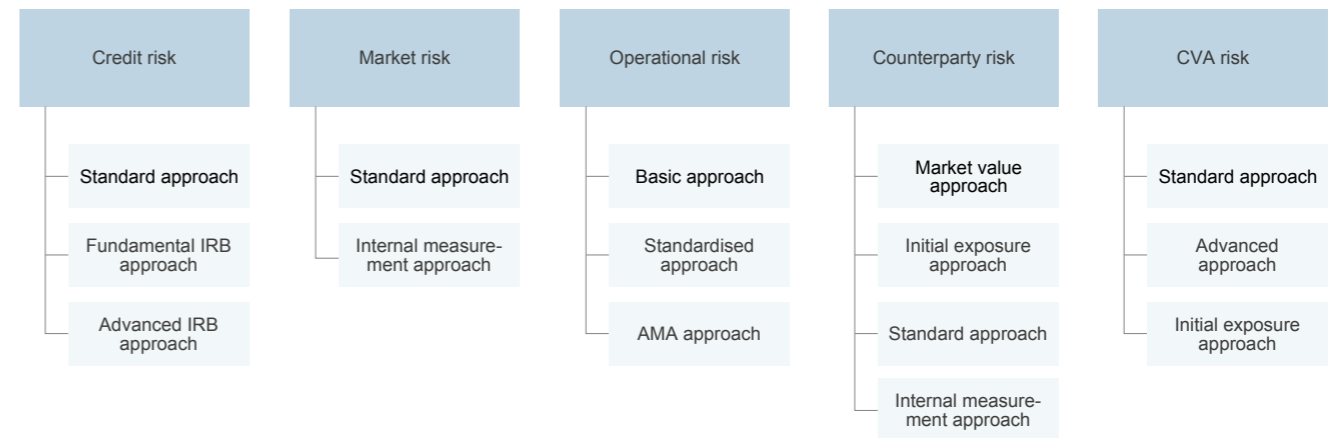
The capital adequacy regulations contain various approaches for calculating capital requirements. The various methods are shown in Figure 3.2.

For institutions that have permission to use an internal measurement approach (hereinafter called IRB approaches, where IRB is an abbreviation of *Internal*

FIG. 3.1 Capital adequacy ratio

$$\frac{\text{CET1 capital} + \text{additional Tier 1 capital} + \text{Tier 2 capital}}{\text{Credit risk} + \text{market risk} + \text{operational risk} + \text{counterparty risk} + \text{CVA risk}} \geq \text{Minimum requirement} + \text{buffer requirement}$$

FIG. 3.2 Approaches for calculating capital requirements



Rating Based Approach), the statutory minimum capital requirement for credit risk will be based on the institution's risk models. The use of IRB approaches will make the minimum capital requirement more risk sensitive and means that capital requirements, to a greater degree than when using the standard approach based on standardised input, will vary more with the risk inherent in the underlying portfolios.

3.1.2 PILLAR 2 – EVALUATION OF THE OVERALL CAPITAL REQUIREMENTS AND INDIVIDUAL SUPERVISORY FOLLOW-UP

Pillar 2 sets requirements for the financial institution's risk and capital assessment process (hereinafter referred to as the ICAAP process, where ICAAP stands for *Internal*

Capital Adequacy Assessment Process). The purpose of the process is to implement a structured and documented assessment process for the Group's risk profile in order to ensure that the Group has adequate capital to cover the risk associated with its operations. In addition, financial institutions must have a strategy for maintaining an adequate level of capital.

The Group calculates its Pillar 2 supplement in a process involving the parent bank, subsidiaries and the stakes in associated companies/joint ventures. The process is based on an assessment of exposure and the quality of management and control, where the capital requirements are mainly based on the approach described in the Financial Supervisory Authority of Norway's circular

- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
 - Capital adequacy regulations
 - ▶ Differences between accounting and capital adequacy consolidation
 - Regulatory alignment
 - The Group's capital adequacy targets
 - Regulatory capital
- 4 CREDIT RISK
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
- 7 MARKET RISK
- 8. OPERATIONAL RISK
- 9 ESG RISK
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

describing practices for assessing risk and capital requirements.

The Financial Supervisory Authority of Norway is required to monitor and evaluate the Group's risk exposure and risk management, internal assessments of capital requirements and associated strategies, as well as the Group's ability to ensure compliance with the authorities' capital requirements. This process is called the SREP process where SREP is an abbreviation of *Supervisory Review and Evaluation Process*. Through its SREP process, the Financial Supervisory Authority of Norway determined that SpareBank 1 Østlandet should be subject to a Pillar 2 requirement in excess of the minimum requirement and buffer requirement amounting to 1.9 per cent of the consolidated risk-weighted assets for Pillar 1, and that the Pillar 2 requirement must be met by a minimum of 56.25 per cent CET1 capital and 75 per cent additional Tier 1 capital, which corresponds to the composition of capital in Pillar 1. The purpose of the Pillar 2 requirement is to cover capital requirements associated with risks that are not, or are only partially, covered by the capital requirements in Pillar 1. In the same process, the Financial Supervisory Authority of Norway determined that SpareBank 1 Østlandet must have a margin in the form of CET1 capital above the overall requirement for the CET1 capital ratio, Tier 1 capital ratio and capital adequacy of at least 1.0 per cent of the risk-weighted assets.

3.1.3 PILLAR 3 – PUBLIC DISCLOSURE OF INFORMATION

The purpose of Pillar 3 is to help increase market discipline and to make it easier to compare institutions. The institutions shall publish information that gives the market participants the opportunity to assess the institutions' risk profile, capitalisation and control of risk. The information shall be provided in an understandable way that makes it possible to compare different institutions. The information shall mainly be published at least annually with the financial statements, but the institutions shall assess whether parts of the information are to be made public more frequently.

3.2 Differences between accounting and capital adequacy consolidation

3.2.1 CONSOLIDATION FOR CAPITAL ADEQUACY PURPOSES

Capital adequacy consolidation follows the rules set out in chapter 18 of the Financial Institutions Act on "Activities in financial groups, consolidation etc.", which is based on the EU's capital requirements directive. The main differences from ordinary consolidation in line with the accounting policies are the expanded consolidation obligation that requires proportionate consolidation of financial institutions where the participant interest is above 20 per cent, as well as the companies that are included in a cooperating group.

Form 3.1 in the appendix containing standardised forms compares the Bank's balance sheet pursuant to the accounting policies and the balance sheet pursuant to the rules in the Capital Requirements Regulation.

3.2.2 Cooperative group

The Group also forms part of a cooperative group according to chapter 17 part III of the Financial Institutions Act "Cooperation outside the Group structure". Jointly owned financial institutions such as SpareBank 1 Boligkreditt AS, SpareBank 1 Næringskreditt AS, BN

¹⁾ Kredittbanken ASA from 1 January 2025 onwards.

²⁾ REPO – Repurchase Agreement.

Bank ASA and SpareBank 1 Kreditt AS¹⁾ are therefore proportionally consolidated for capital adequacy purposes. The inclusion of these companies' balance sheets represents the greater part of the difference between the balance in relation to the accounts and to capital adequacy.

Form 3.3 in the appendix containing standardised forms provides an overview of companies in the Group and their treatment according to IFRS consolidation and capital adequacy consolidation.

3.2.3 Other differences

The Capital Requirements Regulation allows the use of netting and collateral such that exposures within the counterparty risk framework are shown as net values. This results in discrepancies related to the Bank's derivative and repurchase agreements²⁾ compared with the accounting balance sheet where corresponding items are recognised gross. This, together with a minor adjustment linked to the valuation, creates a difference between the balance sheet pursuant to the accounting policies and the balance sheet pursuant to the rules in the Capital Requirements Regulation.

Form 3.2 in the appendix containing standardised forms shows a detail breakdown of the Bank's balance sheet distributed by the relevant framework and differences between the accounting balance sheet and exposures that are included in capital adequacy.

FIG. 3.3 Approaches for calculating capital requirements in the Group¹⁾

Area	SpareBank 1 Østlandet (parent bank)	SpareBank 1 Finans Østlandet
Credit risk		
- Central governments	Standard approach	Standard approach
- Corporates	Standard approach	Standard approach
- Institutions	Advanced IRB approach	Standard approach
- Retail	Advanced IRB approach	Standard approach
- Equity positions	Standard approach	N/A
Market risk	N/A	N/A
Operational risk	Standardised approach	Standardised approach
Counterparty risk	Standard approach	N/A
CVA risk	Standard approach	N/A

¹⁾ The portfolio of the former Totens Sparebank was merged on 1 November 2024 and is calculated using the standard method.

1 INTRODUCTION

2 THE GROUP'S RISK AND CAPITAL MANAGEMENT

3 CAPITAL

Capital adequacy regulations

Differences between accounting and capital adequacy consolidation

▶ Regulatory alignment

The Group's capital adequacy targets

Regulatory capital

4 CREDIT RISK

5 COUNTERPARTY RISK

6 LIQUIDITY RISK

7 MARKET RISK

8. OPERATIONAL RISK

9 ESG RISK

10 OWNERSHIP RISK

11 COMPLIANCE RISK

12 CONDUCT RISK

3.3 Regulatory alignment

The Group attaches importance to maintaining adequate capitalisation for all the companies within the Group at all times. The Group's governing bodies have not imposed any restrictions on the Board's ability to transfer capital between the parent bank and the subsidiaries beyond what follows from law. In addition, there are no provisions in the Articles of Association that impose any such restrictions.

3.3.1 RELEVANT FRAMEWORK FOR CALCULATING RISK WEIGHTED ASSETS

The Bank uses a credit risk framework according to Capital Requirements Regulation Part III, Title II for the greater part of the balance sheet. In the determination of the exposure amount for counterparty risk calculations, the Bank uses full SA-CCR. The Group uses the template method to determine the capital requirement linked to operational risk.

The Bank does not have a trading portfolio and has currency exposure below the threshold level for calculating associated capital requirements and does not therefore use market risk frameworks.

Figure 3.3 provides an overview of the approaches the Group uses for calculating capital requirements.

3.3.2 ENCUMBERED ASSETS

The Bank's pledging of assets as security occurs mainly through four types of transactions:

- Deposit of securities in Norges Bank for borrowing.
- Offsetting and cash collateral in conjunction with derivatives contracts.
- Repurchase agreements.
- Pledging as security of loans in conjunction with the issue of covered bonds.

The majority of the Bank's pledging of assets as security occurs via SpareBank 1 Boligkreditt AS, SpareBank 1 Næringskreditt AS and Totens Sparebank Boligkreditt AS, which issue covered bonds. The bonds are issued with security in a volume of assets, loans secured by real estate property and loans secured by immovable property, respectively. The first two are consolidated proportionally within the Group, which is done in conjunction with capital adequacy calculation, but are consolidated in accordance with the equity approach in the consolidated accounts

according to IFRS. Totens Sparebank Boligkreditt is consolidated in its entirety with respect to both accounting and capital adequacy.

Encumbered assets, including collateral received in relation to total assets and collateral received (asset encumbrance ratio), amounts to 26 per cent for the regulatory group. The equivalent key ratio for the parent bank is 0,3 per cent. For more information on covered bond issues, see the covered bond companies' financial reports.

Please also see the appendix containing standardised forms, main group 18, which deals with encumbered assets.

3.4 The Group's capital adequacy targets

The Group's overarching strategic targets must support a moderate to low risk profile, where the Group should be among Norway's financially strongest and most profitable regional financial groups. The Group's financial strength is expressed through its regulatory capital adequacy. The following conditions shall be taken into account when setting the level of capital:

- The authorities' capital adequacy requirements.
- The need for freedom of action.
- The level of ambition in the strategic targets.
- The commercial framework conditions.
- The desired risk profile.

The Group had the following capital targets at the end of the year:

- CET1 capital ratio equivalent to regulatory requirement + 100 bps.
- Tier 1 capital ratio at least equivalent to regulatory requirement + 100 bps.
- Tier 2 capital ratio at least equivalent to regulatory requirement + 100 bps.
- Leverage ratio at least equivalent to regulatory requirements + 100 bps.

FIG. 3.4 Development of capital adequacy
Per cent

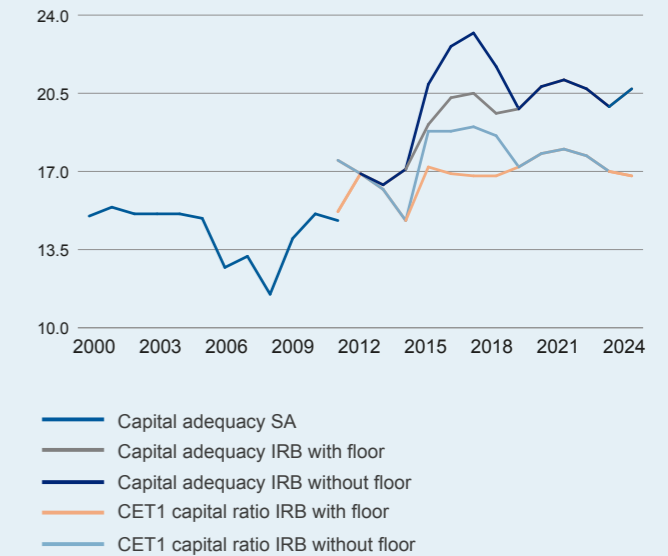
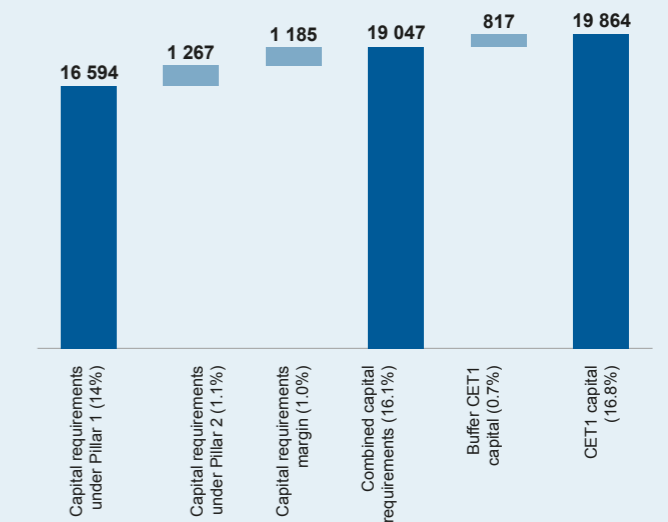


FIG. 3.5 CET1 capital ratio
NOK millions



1 INTRODUCTION**2 THE GROUP'S RISK AND CAPITAL MANAGEMENT****3 CAPITAL**

Capital adequacy regulations

Differences between accounting and capital adequacy consolidation

Regulatory alignment

The Group's capital adequacy targets

▶ **Regulatory capital****4 CREDIT RISK****5 COUNTERPARTY RISK****6 LIQUIDITY RISK****7 MARKET RISK****8 OPERATIONAL RISK****9 ESG RISK****10 OWNERSHIP RISK****11 COMPLIANCE RISK****12 CONDUCT RISK****3.5 Regulatory capital**

At the end of the year, the Group must meet a CET1 capital requirement, including the combined buffer requirement, of 14 per cent under Pillar 1. In addition, the capital requirement under Pillar 2 has, as previously mentioned, been set at 1.9 per cent. The requirements for other additional Tier 1 capital and supplementary capital amount to 1.5 per cent and 2 per cent, respectively, meaning that the Group, as at the end of the year, was subject to a requirement for eligible capital under Pillar 1 and Pillar 2 of 19.4 per cent. Please also see forms 1.1 and 1.2 in the appendix containing standardised forms, which deal with the Group's risk-weighted assets and selected key metrics, respectively, as well as main groups 4 and 21, which deal with eligible capital and requirements for eligible capital and eligible liabilities.

3.5.1 REGULATORY CAPITAL ADEQUACY

Table 3.1 shows the Group's capital adequacy calculation at the end of the year.

Table 3.2 shows the Group's minimum eligible capital requirement (8 per cent) at the end of the year.

Figure 3.4 shows the development of the Group's capital adequacy.

3.5.2 REGULATORY CET1 CAPITAL RATIO – PILLAR 1 AND PILLAR 2

Figure 3.5 provides a graphic representation of the Group's capital situation with a focus on CET1 capital at the end of the year.

3.5.3 LEVERAGE RATIO

The Bank's leverage ratio increased somewhat during the year. The Bank's lending growth was largely offset by a corresponding increase in capital. At the same time, the merger with Totens Sparebank contributed to a net increase in the leverage ratio. Please also see the appendix containing standardised forms, main group 6, which deals with the leverage ratio.



- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
 - Capital adequacy regulations
 - Differences between accounting and capital adequacy consolidation
 - Regulatory alignment
 - The Group's capital adequacy targets
 - ▶ Regulatory capital
- 4 CREDIT RISK
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
- 7 MARKET RISK
- 8. OPERATIONAL RISK
- 9 ESG RISK
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

TABLE 3.1 Calculation of capital adequacy ratio

Parent bank			Group		
	2023	2024	2024	2023	
19 658	24 626	Total recorded equity	26 213	20 660	
		Additional Tier 1 capital			
-1 291	-1 912	Dividends	-1 912	-1 291	
-1 000	-1 800	Additional Tier 1 capital	-1 821	-1 000	
		Non-controlling minority interests	-92	-69	
-	-	Unrealised change in liabilities	-	-	
-57	-1 062	Goodwill and other intangible assets	-1 736	-430	
-411	-290	Positive value of adjusted expected losses according to IRB approach	-440	-541	
-	-	Deduction for material investments in the financial services sector	-	-	
-39	-50	Value adjustments due to requirement for justifiable valuations	-62	-49	
-277	-356	Other adjustments in CET1 capital	-288	-232	
16 584	19 156	Total CET1 capital	19 864	17 047	
		Other Tier 1 capital			
1 000	1 800	Additional Tier 1 capital	1 800	1 000	
-31	-31	Deduction for investments in the financial services sector	-31	-31	
		Additional Tier 1 capital issued by other group companies	345	264	
969	1 769	Total additional Tier 1 capital	2 113	1 233	
		Tier 2 capital in excess of additional Tier 1 capital			
1 400	2 200	Subordinated loan capital	2 200	1 400	
-122	-124	Deduction for investments in the financial services sector	-124	-122	
		Tier 2 capital issued by other group companies	469	429	
1 278	2 076	Total Tier 2 capital	2 544	1 706	
18 831	23 001	Total eligible capital	24 521	19 987	
		Parent bank			
		2023	2024		
5 405	6 425	Exposures with institutions SME	6 443	5 416	
19 615	21 477	Exposures with specialised institutions	22 475	20 621	
4 176	2 692	Exposures with other institutions	2 735	4 267	
1 566	1 824	Exposures with retail SME	2 254	1 930	
21 292	21 877	Exposures with retail private individuals	36 197	33 913	
751	1 109	Exposures with other retails	1 149	781	
52 805	55 405	Credit risk according to IRB approach	71 253	66 927	
		Parent bank			
		2023	2024		
17 438	28 514	Credit risk according to standard method	35 537	23 495	
371	472	Counterparty risk (including CVA)	2 098	2 568	
-	-	Market risk	-	-	
6 614	8 191	Operational risk	9 644	7 351	
77 228	92 582	Total risk-weighted assets	118 532	100 341	
6 178	7 407	Capital requirement (8.0%)	9 483	8 027	
		Group			
		2024	2023		
				2 252	1 906
		Pilar 2 (1.9%)			
		Buffer requirement			
1 931	2 315	Capital conservation buffer (2.5%)	2 963	2 509	
1 931	2 315	Countercyclical buffer	2 963	2 509	
2,5 %	2,5 %	Countercyclical buffer rate	2,5 %	2,5 %	
3 475	4 166	Systemic risk buffer	5 334	4 515	
4,5 %	4,5 %	Systemic risk buffer rate	4,5 %	4,5 %	
7 337	8 795	Total buffer requirement	11 261	9 532	
		Parent bank			
		2023	2024		
14,0 %	14,0 %	CET1 capital requirement	15,1 %	15,9 %	
5 772	6 195	Available CET1 capital in excess of requirement	2 003	1 093	
		Capital adequacy			
21,5 %	20,7 %	CET1 capital ratio	16,8 %	17,0 %	
22,7 %	22,6 %	Tier 1 capital ratio	18,5 %	18,2 %	
24,4 %	24,8 %	Capital adequacy	20,7 %	19,9 %	
9,9 %	10,0 %	Leverage ratio	7,3 %	7,0 %	

1 INTRODUCTION

2 THE GROUP'S RISK AND CAPITAL MANAGEMENT

3 CAPITAL

Capital adequacy regulations

Differences between accounting and capital adequacy consolidation

Regulatory alignment

The Group's capital adequacy targets

▶ Regulatory capital

4 CREDIT RISK

5 COUNTERPARTY RISK

6 LIQUIDITY RISK

7 MARKET RISK

8. OPERATIONAL RISK

9 ESG RISK

10 OWNERSHIP RISK

11 COMPLIANCE RISK

12 CONDUCT RISK

TABLE 3.2 Minimum eligible capital requirement

Exposures classes IRB approach	SpareBank 1 Østlandet (parent bank)	SpareBank 1 Finans Østlandet	SpareBank 1 Boligkreditt AS	SpareBank 1 Næringskreditt AS	SpareBank 1 Kreditt AS	BN Bank ASA	Totens Sparebank Boligkreditt AS	SpareBank 1 Østlandet (Group)
Institutions - SME	514	-	6	-	-	0	-	515
Specialised institutions	1 718	-	-	-	-	799	-	1 798
Other institutions	215	-	-	-	-	35	-	219
Retail with real estate as collateral - SME	146	-	154	-	-	16	-	180
Retail with real estate as collateral - non-SME	1 750	-	4 987	-	-	838	-	2 896
Retail - Other SME	8	-	1	-	-	0	-	8
Retail - Other non-SME	81	-	13	-	-	1	-	84
Equity positions IRB	-	-	-	-	-	2	-	-
Total capital requirement for credit risk IRB approach	4 432	-	5 160	-	-	1 691	-	5 700
Exposures classes standard method including counterparty risk	SpareBank 1 Østlandet (parent bank)	SpareBank 1 Finans Østlandet	SpareBank 1 Boligkreditt AS	SpareBank 1 Næringskreditt AS	SpareBank 1 Kreditt AS	BN Bank ASA	Totens Sparebank Boligkreditt AS	SpareBank 1 Østlandet (Group)
Central governments and central banks	10	-	96	-	-	8	-	34
Local and regional authorities (including municipalities)	83	3	-	-	4	27	-	90
Public institutions	-	-	-	-	-	-	-	-
Multilateral development banks	-	-	-	-	-	-	-	-
International organisations	-	-	-	-	-	-	-	-
Corporates	257	0	309	7	18	51	9	152
Institutions	145	213	-	503	-	234	-	426
Retail exposures	166	477	-	2	568	10	-	760
Exposures with real estate as collateral	541	-	0	85	-	141	70	635
Exposures in default	53	20	-	-	30	0	-	79
High risk exposures	-	-	-	-	-	-	-	-
Covered bonds	138	-	174	3	3	34	1	184
Receivables from corporates and institutions with short-term rating	-	-	-	-	-	-	-	-
Units in securities funds	-	-	-	-	-	0	-	0
Equity positions	854	-	-	-	-	-	-	444
Other exposures	57	26	26	0	8	6	0	124
Total capital requirement for credit risk standard method including counterparty risk	2 304	738	606	600	632	512	80	2 926
Operational risk	655	46	93	15	78	210	5	772
CVA	15	-	277	16	-	31	-	85
Addition for risk weight floor (in accordance with Article 458)	-	-	-	-	-	-	-	-
Total capital requirements	7 407	784	6 135	631	710	2 444	85	9 483

- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
 - ▶ Management and control
 - Asset quality
 - CRM techniques
 - Use of external ratings under the standard method
 - IRB approach
 - Portfolio information
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
- 7 MARKET RISK
- 8. OPERATIONAL RISK
- 9 ESG RISK
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

4 Credit risk

Credit risk is the risk of losses resulting from a customer's or other counterparty's inability or unwillingness to fulfil its obligations. The Bank is subject to credit risks mainly through loans to personal and corporate market customers, hereinafter referred to as Retail Division and Corporate Division, but also through other assets that the Bank holds capital for. In the latter group are guarantees, unused withdrawal rights, interest-bearing securities, equity positions and investments in the interbank market. Credit risk also includes growth and concentrations arising from large exposures to individual customers, single industries and geographical areas.

4.1 Management and control

Credit risk in the Group shall be managed in accordance with the requirements and recommendations in the:

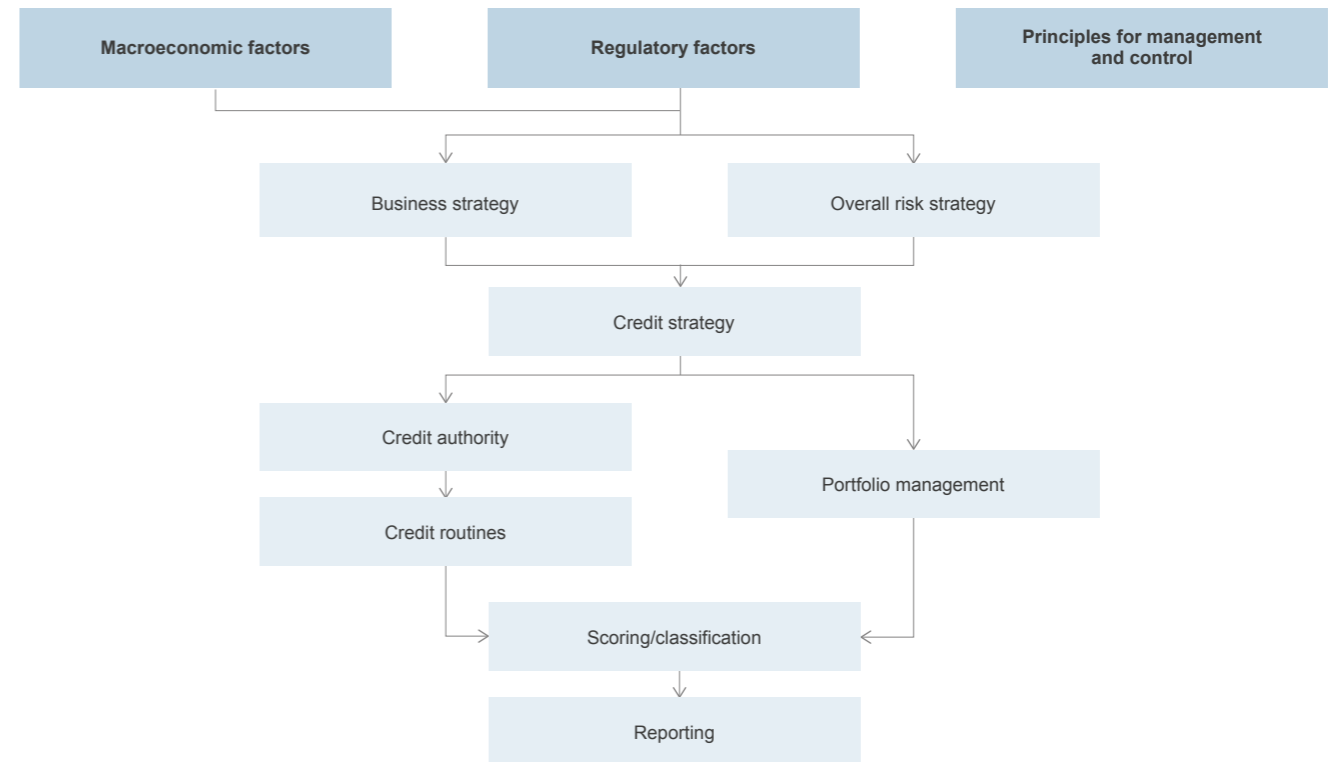
- Financial Institutions Act.
- CRR/CRD IV Regulation.
- The Financial Supervisory Authority of Norway's methodology for risk-based supervision.
- Key recommendations from the EBA.

The Group shall have a quality in credit handling and the portfolio that contributes to a low credit loss over time. Figure 4.1 shows strategies and procedures that are the basis of the Group's management and control of credit risks in the portfolios.

4.1.1 GOVERNING DOCUMENT FOR CREDIT RISK

The governing document for credit risk provides a description of both the credit strategy and the credit policy of the retail market and the corporate market. The document is issued by the Board and revised as required, and at least once a year. The purpose of the strategy part is to establish principles for the Bank's credit granting and how credit risk in the Bank should be managed. The purpose of the credit policy part is to guide practices within the area of credit in the retail market and the corporate market. The policy is also designed to ensure that the Bank acts in a uniform manner and in accordance with the external regulatory framework, including laws and regulations, and risk and quality levels stipulated internally.

FIG. 4.1 Framework for managing credit risk



- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
 - Management and control
 - ▶ Asset quality
 - CRM techniques
 - Use of external ratings under the standard method
 - IRB approach
 - Portfolio information
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
- 7 MARKET RISK
- 8. OPERATIONAL RISK
- 9 ESG RISK
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

4.1.2 RULES AND REGULATIONS FOR GRANTING CREDIT/CREDIT AUTHORITIES

The Board delegates credit authority to the Group CEO and determines the Bank's rules and regulations for granting credit. The credit authorities are personal and should reflect the competence of the individual. Credit authorities are differentiated by volume and risk. The rules and regulations for granting credit are revised as required and at least once a year.

4.1.3 PROCESS DOCUMENTATION/ CREDIT ROUTINES

The documentation regulates various matters related to the ongoing granting of credit and follow-up of exposure, including routines for following up doubtful exposures, assessment of the need for impairment etc. The documentation is prepared by the credit managers in consultation with the business divisions. The documents are revised on an ongoing basis.

4.1.4 RISK PRICING

The Group strives to achieve the right pricing of credit risk and has established price models and customer profitability models based on the risk classification system.

4.1.5 VALIDATION

The purpose of the validation process is to verify the credit risk models and the Group's IRB system to ensure that both the quality of the models and the compliance with and application of the IRB system are good over time. The process and preparation of the necessary reports are carried out by the risk management department. The validation report is considered by the Risk Management Committee with the participation of the Group CEO. The Board processes the validation report and makes decisions related to relevant factors it addresses.

4.1.6 STRESS TESTING

Regular stress tests of the credit portfolio are performed in which developments in credit portfolios are stressed as a result of large, but not improbable, negative changes in framework conditions. The purpose of the result of such analyses is to indicate the extent to which the portfolio or parts of the portfolio can withstand an abnormal and powerful weakening of the assumptions, and thus how this affects the Bank's risk pattern and solvency.

4.1.7 FOLLOW-UP OF CREDIT RISK/RISK REPORTING

Risk exposure within the credit area is followed up using a portfolio management system. Importance is attached to following up the portfolio risk distribution and its development based on movements between risk classes, probability of default, risk-weighted assets and concentration risk.

The Retail Division and Corporate Division monitor portfolio credit risk on a monthly basis. The credit risk is followed up based on current strategic frameworks and objectives, as well as whether development in the portfolios is in the desired direction. The Risk Management Department monitors risk in the credit portfolio and reports to the Board every quarter and via monthly risk reports that are distributed to relevant recipients in the Bank.

4.1.8 ORGANISATION

The risk management function is distributed according to discipline, with a separate team for credit and ESG risk. The department is organised in accordance with Figure 2.1, where it reports to the Group CEO, but it also able to report directly to the Board of Directors. The risk management function maintains a close dialogue with the internal auditor, which carries out independent assessments. Where this is deemed appropriate, the internal auditor may use the results of the risk management function's analyses and checks as input for their work.

4.2 Asset quality

4.2.1 IMPAIRMENT LOSSES ON LOANS

Losses on lending are calculated based on the expected credit loss according to the general model of impairment of financial assets in IFRS 9. The measurement of impairment for expected losses depends on whether or not the credit risk has increased significantly since initial capitalisation. Credit deterioration is measured by the development of financial PD.

Loss estimates are calculated on a quarterly basis and are based on data which contains a history of account and customer data for the entire credit portfolio. The loss estimates are calculated based on the 12-month and lifelong probability of default, loss on default and exposure on default respectively.

In line with IFRS 9, the loans are grouped into three stages.

Stage 1

This is the starting point for all lending covered by the general loss model. A loss cost equal to 12 months' expected losses is calculated for all assets that do not have a significantly higher credit risk than they did upon initial recognition.

Stage 2

Stage 2 includes lending that has seen a significant rise in credit risk since initial recognition, but that does not have objective evidence of a loss event. A loss cost equivalent to the expected losses over the lifetime will be calculated for these assets. This group includes loans with a significant degree of credit deterioration, but which on the balance sheet date belong to customers that are classified as healthy.

Stage 3

Stage 3 includes lending that has seen a significant rise in credit risk since being granted and where there is objective evidence of a loss event on the balance sheet date. For these assets, the loss provision must cover expected losses over the useful life.

- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
 - Management and control
 - Asset quality
 - ▶ CRM techniques
 - Use of external ratings under the standard method
 - IRB approach
 - Portfolio information
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
- 7 MARKET RISK
- 8. OPERATIONAL RISK
- 9 ESG RISK
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

4.2.2 INDIVIDUAL IMPAIRMENT

Individual impairment for losses on individual exposures is made when objective evidence of default is expected to result in a loss of value for the Group.

Individual write-downs represent the difference between the exposure's book value and the present value of the discounted cash flow based on the effective interest rate at the time of the initial calculation of the individual write-down. A write-down entails that an exposure is given the highest risk class.

Importance is attached to specific project orientation and caution in the estimation of value as grounds for the realisation of collateral security. The cash flow is updated at least once a year based on materiality assessments.

Individual impairments reduce the book value of the exposures on the balance sheet, and changes in the assessed value during the period are recognised in the income statement as losses on loans and guarantees.

4.2.3 DEFAULTED AND IMPAIRED LOANS

The Bank's definition of defaults was formulated in line with the European Banking Authority's guidelines for how banks should apply the definition of default in the Capital Requirements Regulation (CRR) and clarifications in the CRR/CRD Regulation. The same definition is used for both accounting and regulatory defaults.

Table 4.1 shows provisions in relation to net defaulted and doubtful exposures.

The extent of the exposures that have defaulted but have not been individually impaired is shown in the table above with a total loan loss impairment ratio of 18 per cent. The remaining exposures in default have been assessed, although as at 31 December 2024 there is no objective evidence that they will lead to a loss in value for the Group.

Exposures may also be considered as doubtful without the exposure being in default. Other doubtful exposures are marked with a loss event in which objective conditions indicate a probability of loss of value. For these exposures, the loan loss impairment ratio is 31 per cent.

TABLE 4.1 Defaulted and impaired exposures

Defaulted (more than 90 days) and doubtful exposures	2024	2023	2022
Defaulted exposures (over 90 days)	959	367	259
Individual impairments of defaulted exposures	170	55	58
Net exposures in default	789	312	201
Loan loss provision ratio	18 %	15 %	23 %
Other doubtful exposures	1 597	1 583	472
Individual impairments in other doubtful	496	180	32
Net other doubtful	1 101	1 403	441
Loan loss provision ratio	31 %	11 %	7 %
Total loan loss impairment ratio	26 %	12 %	12 %

4.3 CRM techniques

4.3.1 COLLATERAL

Collateral is used to mitigate credit risk. When credit is granted, the customer is normally required to furnish collateral for the loan exposure. The most common form of mortgages secured by immovable property, although commercial collateral such as collateral in inventories, plant and machinery and trade receivables, guarantees by individuals, institutions, state/municipalities, guarantee institutions or banks, as well as other mortgaged objects, are also used.

TABLE 4.2 Most commonly used collateral types

Collateral type	Retail market	Corporate market
Property	x	x
Plots	x	x
Securities	x	x
Guarantees	x	x
Plant and machinery		x
Motor vehicles/fixed assets		x
Inventory		x
Accounts receivable		x
Deposits	x	x

4.3.2 VALUATION OF COLLATERAL

The banks of the SpareBank 1 Alliance essentially use the same routines and guidelines for determining the value of collateral. The guidelines govern which assessment criteria should be used as the basis, the frequency with which the collateral valuations should be updated, as well as the use of reduction factors.

The market value of residential property is determined by the use of purchase price according to contract, estate agent valuation or value estimates from Eiendomsverdi. The estimated market value of most residential properties is updated quarterly.

For commercial property, the present value of expected net cash flow associated with the property is normally used as a basis. The value basis is calculated by taking into account ongoing leases, costs and yield. The latter takes into account location, alternative area of use, duration of lease, condition of property, solvency, regulation and risk-free

- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
 - Management and control
 - Asset quality
 - CRM techniques
 - ▶ Use of external ratings under the standard method
 - IRB approach
 - Portfolio information
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
- 7 MARKET RISK
- 8 OPERATIONAL RISK
- 9 ESG RISK
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

interest rate. For the institutions portfolio, the Bank performs an assessment of the value base of security at least annually, either through an annual exposure review, when granting credit or in conjunction with automatic updates.

4.3.3 COUNTERPARTY SUBSTITUTION

The Bank uses counterparty substitution for certain guaranteed products. These are government-guaranteed loans that were provided during the pandemic, government-guaranteed electricity support loans and loans/credits guaranteed by Innovation Norway. However, there is a very limited volume of these products, totalling NOK 43 million as of 31 December 2024.

4.4 Use of external ratings under the standard method

The Bank determines the risk weight based on an external rating for each individual exposure. Long-term ratings from the following rating agencies are used for the Bank's institutional counterparty exposures:

- Moody's Investors Service
- Scope Ratings GmbH
- S&P Global Ratings Europe Limited
- DBRS Ratings GmbH

For these exposures, ratings are used to place the counterparty on a credit quality step that further specifies the appropriate risk weight. In the event of several ratings for the same counterparty, the credit quality step is determined based on more detailed rules in the Capital Requirements Regulation.

The parent bank's counterparty exposures for the institutions category are specified in Table 4.3.

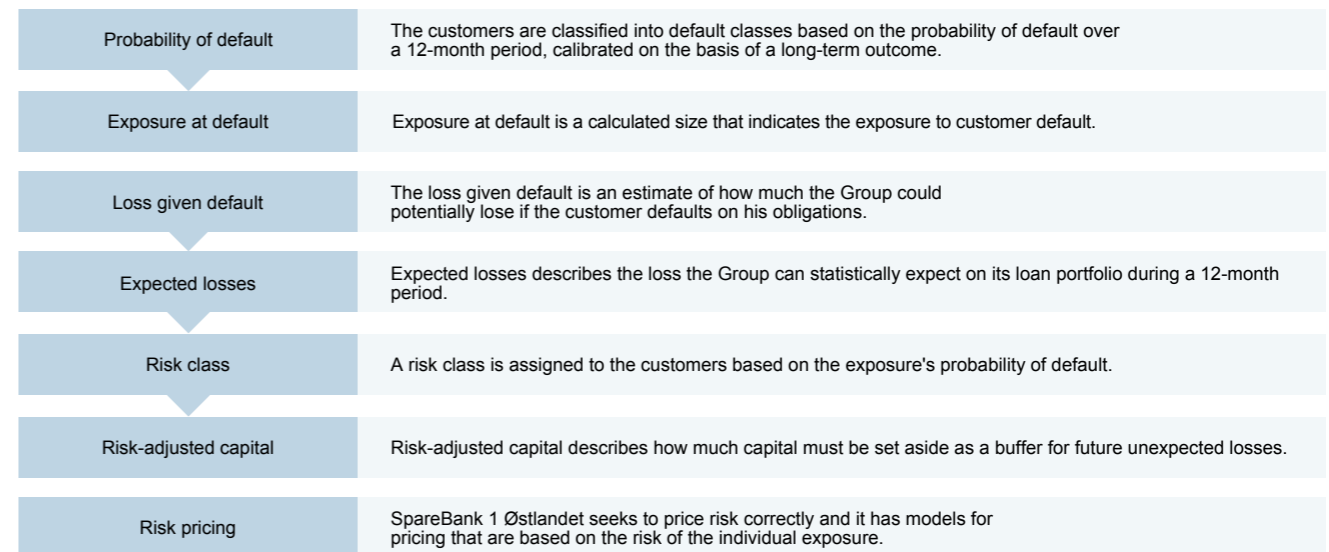
TABLE 4.3 Counterparty exposures for the institutions category

Credit quality steps	EAD	RWA
1	21 495	1 767
2	6 026	1 315
3	517	469

4.5 IRB approach

SpareBank 1 Østlandet and SpareBank 1 Finans Østlandet use common models for calculating credit risk at the portfolio level and in the granting process together with the other banks and financing companies in the SpareBank 1 Alliance. The models are primarily based on statistical calculations and are divided into scorecards for different segments. The parent bank uses the model both in internal reporting and in capital adequacy calculations. The models are based primarily on the components in Figure 4.2.

FIG. 4.2 Risk classification system



In addition, a cash flow model is used internally in calculating PD on granting and following-up institution exposures in the rental of commercial property sector. The model is also used to determine the estimated values of the objects that will be financed. A process is underway to obtain permission to use the model in capital adequacy calculations.

- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
 - Management and control
 - Asset quality
 - CRM techniques
 - Use of external ratings under the standard method
 - IRB approach
 - Portfolio information
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
- 7 MARKET RISK
- 8 OPERATIONAL RISK
- 9 ESG RISK
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

4.5.1 THE IRB SYSTEM

The capital adequacy regulations allow banks to apply to the authorities to use their own models to calculate the capital requirement for credit risk. The approach entails that capital requirements are calculated based on the Bank's own estimates of probability of default (PD), loss given default (LGD), estimated utilisation of frame credits and loan fees (KF), and time to maturity (M).

SpareBank 1 Østlandet has permission to use the advanced IRB approach for calculating the capital requirements for credit risk for the exposure categories institution and retail¹⁾. The Bank has exceptions to the IRB approach for certain exposures. The exemptions apply to states/municipalities and institutions, where permanent exemptions have been granted, as well as housing cooperatives and associations/clubs, where the Group uses the standard approach.

For the reporting of capital adequacy, the portfolios of the wholly and part-owned institutions are consolidated proportionately based on the approved method of the institution.

Table 4.4 describes the Group's methods for estimating the minimum eligible capital requirement for the different exposure categories and portfolios.

4.5.2 APPLICATION OF THE IRB SYSTEM

Use of the IRB approach sets stringent requirements for estimation of the risk parameters, competence and application in the business.

The Bank has long experience of using the IRB approach and has professionalised risk management in line with the applicable requirements and expectations. The IRB system is well integrated in the organisation and is used in granting and following up individual exposures, pricing, capital allocation, and in the preparation of strategies, strategic risk frameworks and reporting.

The models used are subject to annual validation to ensure sufficiently robust estimates. The composition and level of the models are adjusted as required according to established routines, as well as to ensure that the models' cyclical properties are safeguarded. The Financial Supervisory Authority of Norway conducts periodic supervision of the Bank's application of the IRB system.

¹⁾ The portfolio of the former Totens Sparebank was merged on 1 November 2024 and is calculated using the standard approach.

TABLE 4.4 Approved method for calculating the minimum eligible capital requirement¹⁾

Company	Portfolio	Regulatory approach
SpareBank 1 Østlandet - parent bank	Central governments/municipalities	Standard approach
SpareBank 1 Østlandet - parent bank	Corporates	Standard approach
SpareBank 1 Østlandet - parent bank	Cooperatives, clubs and associations	Standard approach
SpareBank 1 Østlandet - parent bank	Institutions	IRB Advanced
SpareBank 1 Østlandet - parent bank	Retail	IRB
SpareBank 1 Finans Østlandet AS	Leasing and sale security	Standard approach
SpareBank 1 Kreditt AS	Credit cards	Standard approach
SpareBank 1 Boligkreditt AS	Retail	IRB
SpareBank 1 Næringskreditt AS	Institutions	Standard approach
Totens Sparebank Boligkreditt AS	Retail	Standard approach

¹⁾ The portfolio of the former Totens Sparebank was merged on 1 November 2024 and is calculated using the standard approach.

4.5.3 MODELS USED IN REGULATORY IRB REPORTING

Table 4.5 shows which models the Bank uses in regulatory IRB reporting as at the end of 2024.

TABLE 4.5 Models used in regulatory IRB reporting

Exposure class	Customer segment	PD model	Scorecard	EAD model	LGD model
Retail market – secured by homes and real estate (SME and non-SME)	All retail market customers	PD model for retail market	Scorecard residential property	EAD retail market	LGD retail market
	All self-employed who are registered in the Bank with personal ID number				
Other retail customers (SME and non-SME)	All retail market customers	PD model for retail market	Scorecard other	EAD retail market	LGD retail market
	All self-employed who are registered in the Bank with personal ID number				
Institutions	All institutions except the following segments	PD model for corporate market	«Subdivision in industry groups and scorecard»	EAD corporate market	LGD corporate market
	- Corporates and central governments	Standard approach			
	- Housing cooperatives				
- Associations, clubs and organisations					

- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
 - Management and control
 - Asset quality
 - CRM techniques
 - Use of external ratings under the standard method
 - IRB approach
 - Portfolio information
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
- 7 MARKET RISK
- 8. OPERATIONAL RISK
- 9 ESG RISK
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

4.5.3.1 The PD model

PD is an expression of how probable it is that a customer will default within the next 12 months. The Bank uses the PD models when granting credit and in monthly reclassifications of the customers. The PD model is also used in pricing, ongoing reporting and follow-up of exposures. Table 4.6 shows how the PD model is built up.

The model estimates are a combination of stable and expected estimates. This is because the model uses explanation variables that quickly capture changes in a customer's financial situation, such as payment notes, and other explanation variables that change periodically, such as accounting or assessment information. This may result in a time lag for estimated PD relative to observed DR, which stands for default rate. In addition, the calibration of the estimates plays a part in that the calibration methodology is an element for adjustment against defaults (DR) in a serious recession.

4.5.3.2 The EAD model

The EAD model estimates the customer's exposure to default. EAD is the exposure on the balance sheet with the addition of exposure outside the balance sheet multiplied by a conversion factor. For credits, the conversion factor specifies how much of the available credit frame is assumed to be withdrawn by default. For guarantees, the conversion factor specifies the proportion of the guarantee that is assumed to be paid out on default. The Bank uses the EAD model when granting credit and in monthly reclassifications of the customers. The EAD model is also used in pricing, ongoing reporting and follow-up of exposures. Table 4.7 shows how the EAD model is built up.

TABLE 4.6 Build-up of the PD model

Exposure class	Explanatory variables	Method	History and calibration	Regulatory requirements
Institutions	Accounting Payment history and other behavioural information Industry Age	The Bank uses a scorecard model based on regression analysis, where historical observations are used to predict probability of default. Score cards are divided into nine industry variants to take into account that explanation variables have different significance for different industries. In addition, the calibration level can be set differently for different industries to take into account different historical default levels.	Data basis for estimation and validation: > 10 years When calibrating a level, a method is used that is similar to that determined by the authorities for mortgages, but with other parameter values. In this way, the Bank takes into account the actual historical default level when predicting future defaults. The Bank uses up to 7 years of history when calibrating the level, as well as including the assumed default rate in a severe economic downturn. The model has a ceiling for PD for healthy customers, set at 30 per cent.	No customers can be assigned a PD lower than 0.03 per cent.
Retail	Tax assessment Information Liquidity and liabilities Payment history and other behavioural information Age	The Bank uses a scorecard model based on regression analysis, where historical observations are used to predict probability of default. Score cards have two versions: mortgages and other loans, of which the former portfolio is the dominant. The explanation variables are weighted differently in the two variants. In addition, the calibration level can be set differently to take into account different historical default levels.	Data basis for estimation and validation: > 10 years When calibrating a level, a method determined by the authorities is used that takes into account the actual default rate at the Bank and an assumed default rate in a severe economic downturn. The model has a ceiling for PD for healthy customers, set at 40 per cent.	No mortgage customers can be assigned a PD lower than 0.2 per cent.

TABLE 4.7 Build-up of the EAD model

Exposure class	Method and explanatory variables	History and calibration	Regulatory requirements
Institutions	Model that assigns conversion factor by account type (guarantee or credit facility), score type, and probability of default.	Data basis for estimation and validation: > 10 years	The level of the conversion factor should be set so as to provide an estimate of withdrawals in an economic downturn The guarantee conversion factor has a parameter determined by the authorities of 100 per cent for loan guarantees and 50 per cent for contract and other guarantees.
Retail	Model that assigns conversion factor by account type (guarantee or credit facility)	Data basis for estimation and validation: > 10 years	The level of the conversion factor should be set so as to provide an estimate of withdrawals in an economic downturn The guarantee conversion factor has a parameter determined by the authorities of 100 per cent for loan guarantees and 50 per cent for contract and other guarantees.

- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
 - Management and control
 - Asset quality
 - CRM techniques
 - Use of external ratings under the standard method
 - IRB approach
 - Portfolio information
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
- 7 MARKET RISK
- 8. OPERATIONAL RISK
- 9 ESG RISK
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

4.5.3.3 The LGD model

LGD indicates the proportion of the Bank's exposure to a customer that is expected to be lost if the customer defaults. The Bank uses the LGD model when granting credit and in monthly reclassifications of the customers. The LGD model is also used in pricing, ongoing reporting and follow-up of exposures.

Security is the dominant explanation variable in the LGD model. Therefore, having good estimates of the value of security is crucial to the quality of the LGD model's estimates. Together with the SpareBank 1 Alliance, the Bank has routines for the valuation of collateral to ensure a prudent core value. The routines are subject to annual audit and maintenance.

The LGD estimate shall take into account a future severe recession, which means that the value of the security is adjusted down by a reduction factor in calculating LGD. The Bank's reduction factors are approved by the Financial Supervisory Authority of Norway and validated annually based on internal loss data. The model itself has also been adjusted for downturns to take account of a severe future recession.

As well as security, estimates of recovery probability, recovery of unsecured exposures and collection costs are used to estimate LGD. Table 4.8 shows the structure of the LGD model.

4.5.4 VALIDATION

Modelled estimates will always be subject to uncertainty. Validation of the IRB models is important to ensure that the models' estimates are in line with the actual risk the Bank is exposed to. Robust buffers are used in an attempt to compensate for uncertainty in model estimates. The size of the buffer depends on the cyclical sensitivity of different parameters. Uncertainty in the models is also taken into account through various safety margins, which make the estimates sufficiently conservative.

Validation therefore represents an important quality assurance of the Bank's IRB system. The IRB system is tested through both quantitative and qualitative validation in accordance with the regulations.

TABLE 4.8 Structure of the LGD model

Exposure class	Explanatory variables	Method	History and calibration	Regulatory requirements
Institutions	Collateral Customer type Equity proportion EAD	The Bank uses a structural/definition model that estimates LGD based on sub-models. Security is the dominant explanation variable.	Data basis for estimation and validation: > 10 years LGD is calibrated through parameter values in the model	The Bank is required to include a safety margin imposed by the authorities in its LGD estimates.
Retail	Collateral Product	The Bank uses a structural/definition model that estimates LGD based on sub-models. Security is the dominant explanation variable.	Data basis for estimation and validation: > 10 years LGD is calibrated through parameter values in the model	For boliglån justeres estimatene mot Finans-tilsynets referansemodell. For boliglån er det også satt et gulv på 20% for LGD på porteføljenivå.

Quantitative validation is a process that ensures that the Bank's estimates for PD, KF, EAD, and LGD have adequate quality. The quantitative validation process includes an assessment of:

- The quality and representativeness of the data.
- The model's ability to rank customers.
- The model's ability to estimate correct levels.

Table 4.9 lists the various assessments in the quantitative validation. The above parameters are included in the calculation of expected loss (hereinafter abbreviated to EL), and the Bank validates this estimate by looking at the expected loss against actual losses in the period.

Qualitative validation is a process that ensures that the models are tailored to the Bank's portfolios and that they represent a central ingredient of the Bank's risk management and decision-making. The IRB system also includes the models, work and decision-making processes, control mechanisms, IT systems and internal guidelines and routines associated with the classification and quantification of credit risks when using the IRB models.

1 INTRODUCTION

2 THE GROUP'S RISK AND CAPITAL MANAGEMENT

3 CAPITAL

4 CREDIT RISK

Management and control

Asset quality

CRM techniques

Use of external ratings under the standard method

IRB approach

Portfolio information

5 COUNTERPARTY RISK

6 LIQUIDITY RISK

7 MARKET RISK

8. OPERATIONAL RISK

9 ESG RISK

10 OWNERSHIP RISK

11 COMPLIANCE RISK

12 CONDUCT RISK

TABLE 4.9 Assessments in the validation

	Suitability and stability	Ranking ability	Level
PD	The validation examines whether the population that the model is applied to is similar to the model's estimation basis. This is safeguarded through statistical tests and qualitative assessments of the data basis.	Tests the model's ability to distinguish between customers that default and customers that do not default. For this, the Bank uses both migration matrices and statistical analyses such as AUC	Verifies that the estimated level is robust, measured against actual observations of the default rate. To define what is sufficiently high, a long-term outcome is calculated, based on up to seven years of default history and an assumed default rate in an economic downturn.
EAD (KF)	An assessment is made of whether the model is adapted to the customer base.	Unlike default (PD), the conversion factor (KF) does not have a binary outcome (default or non-default). Therefore, when evaluating the ranking ability of the EAD model, we see whether the model is able to distinguish between customers with high conversion factor and low conversion factor.	By means of validation we check whether the estimated level is robust, measured against actual observations of default.
LGD	An assessment is made of whether the model can be applied to the customer base.	Assessment of the ranking ability of the LGD model has the same approach as the EAD model. We assess whether the LGD model is able to distinguish between default customers with a high level of loss and those with a low level of loss, measured against actual observations	Estimated values are measured against the Bank's historically observed values. Assessment of whether the LGD model estimates are sufficiently high. Must take into account that the estimated LGD must be calibrated against a recession.

4.5.4.1 Model development and validation roles

It is important that the validation of the credit models is done with a sufficient degree of independence. Independence is achieved through the following central roles:

- Model manager – responsible for developing and maintaining the credit models.
- Validation manager – responsible for validating the models.
- Internal audit.

SpareBank 1 Østlandet, in the area of risk management, is responsible for the qualitative and quantitative validation of the Bank. The Bank annually prepares a validation report that includes all models, portfolios, and sub-parameters. Here, each model is considered within the areas of suitability, ranking ability and level. Analysis is done on sub-portfolios, such as industries. The report, which also deals with qualitative validation, is handled by the Bank's Risk Management Committee before it is presented to the Board of Directors.

Also, development in estimates and observations is continuously monitored so as to monitor the models'

performance. Analyses are performed to give an early warning if a model tends towards a weaker performance, whether this is due to the model no longer being suited to the portfolio in question, or the ranking ability diminishing or the estimates varying too much from the actual observations.

The SpareBank 1 Alliance's competence centre for credit models (hereinafter called CFC) is developing new models and further developing existing models on behalf of, and in collaboration with, the banks in the Alliance. Additionally, the CFC contributes with professional input to the quantitative validation. In CFC, responsibility for model development and validation is also split to ensure independence.

The organisation is illustrated in Figure 4.3. The people responsible for validation in the SpareBank 1 banks participate in the Alliance's Validation Forum together with the CFC. Similarly, those responsible for models in the banks participate in the Alliance's Model Committee. The people responsible for validation conduct analyses and make recommendations to those responsible for models based on validation findings and reconciliations with the

1 INTRODUCTION

2 THE GROUP'S RISK AND CAPITAL MANAGEMENT

3 CAPITAL

4 CREDIT RISK

Management and control

Asset quality

CRM techniques

Use of external ratings under the standard method

▶ IRB approach

Portfolio information

5 COUNTERPARTY RISK

6 LIQUIDITY RISK

7 MARKET RISK

8. OPERATIONAL RISK

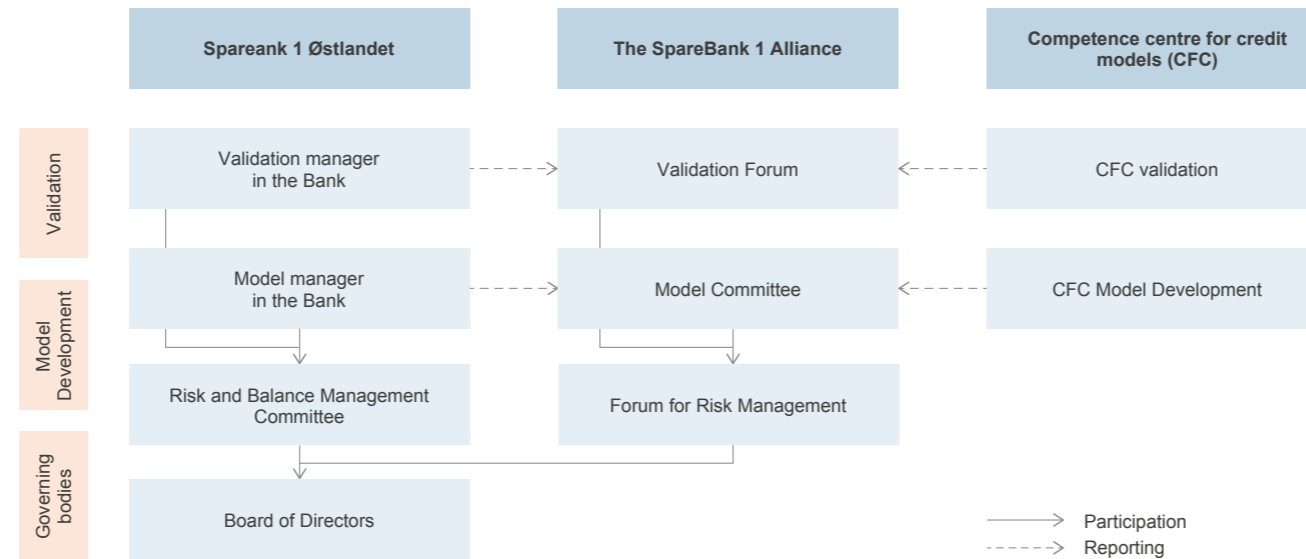
9 ESG RISK

10 OWNERSHIP RISK

11 COMPLIANCE RISK

12 CONDUCT RISK

FIG. 4.3 Organisation of model development and validation



Alliance's Validation Forum. Those responsible for models are responsible for implementing the necessary measures based on this.

Internal audit conducts audits at least once a year to ensure that the IRB system is used in accordance with, and complies with, the applicable regulations and the terms of the IRB approval. The purpose of the audit is to provide the Board and Group Management with an independent assessment of the validation of the IRB system, whether the system is properly integrated into the Bank and whether it constitutes a key element of the Bank's risk management and decision-making process.

4.6 Portfolio information

For portfolio information, please see the appendix containing standardised forms, main groups 8-11, which deal with credit risk.

- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
- 5 COUNTERPARTY RISK
 - ▶ Management and control
 - Portfolio information
- 6 LIQUIDITY RISK
- 7 MARKET RISK
- 8 OPERATIONAL RISK
- 9 ESG RISK
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

5 Counterparty risk

Counterparty risk can be defined as the risk of financial loss if a counterparty to a transaction defaults before final settlement. In addition to the aforementioned counterparty risk, it also includes the risk of an impaired credit rating at counterparties in derivative contracts (CVA risk).

5.1 Management and control

The management of the Group's counterparty risk is regulated in the Bank's risk-based governing documents. In accordance with the governing document for market risk policy, the Group's trading in derivatives shall be within the general limits for interest rate, currency, equity and counterparty risk. The governing documents are adopted by the Board and apply for the strategy period, although they are revised as required and at least once a year.

The Group enters into derivative trades on the basis of customer demand and to hedge positions arising from such activity. Derivatives are also used to hedge currency and interest rate risks arising in connection with borrowing and lending.

Derivatives are traded with several different counterparties, which also do other types of business. Credit risks arising in connection with trading in derivatives is included in the measurement of credit risk in a capital adequacy context. Please refer to the notes in the Group's annual financial statements for a description of the accounting treatment of financial instruments.

The common European Market Infrastructure Regulation (EMIR) regulates clearing obligations and obligations to implement risk mitigation measures in cases where clearing is not applicable. EMIR also sets out requirements for bilateral counterparty agreements that include risk-reducing measures, including with regard to pledging assets as security. This means that the Bank cannot conduct derivative transactions with bank counterparties where ISDA and CSA agreements have not been established. ISDA is an abbreviation of the International Swaps and Derivatives Association, which is an association of international financial institutions, and an ISDA

agreement enables offsetting. CSA is an abbreviation for Credit Support Annex and such an agreement allows collateral received to be seen in context.

In order to minimise counterparty risk against individual counterparties, ISDA and CSA agreements have been entered into with the Group's bank counterparties, while the Group also makes use of clearing for key clearing counterparties. In order to address the clearing related need for diversification, the Group strives to have active agreements with several clearing brokers.

The Group also has exposure limits to further reduce concentration risk in relation to individual counterparties. The exposure limits also register CVA risk in relation to bank counterparties, also known as wrong-way risk, since the limits are based on EAD that is included in the calculations of both counterparty risk and CVA risk. This type of risk in relation to customer counterparties is managed through credit ratings. The qualitative counterparty limits are determined based on the counterparties' rating from official rating agencies. As far as received collateral is concerned, the Group has set concentration risk limits for this and daily reconciliation is carried out, along with any necessary margining in connection with CSA agreements. The collateral pledged consists exclusively of cash deposits. The CSA agreements do not contain provisions concerning the supply of additional collateral in the event of a downgraded rating. CSA agreements only deal with the value of the derivative, and this can only be changed by changes to the market parameters included in the derivative contract.

5.1.1 RESPONSIBILITY FOR COUNTERPARTY RISK INTEREST AND CURRENCY DERIVATIVES

The CFO bears overall responsibility for the Group's counterparty risk related to interest and currency derivatives. Operational responsibility for the counterparty risk associated with interest rate and currency derivatives has been delegated such that the CFO is responsible for the counterparty risk related to interest rate and currency derivatives associated with the Group's financing and investments, while the head of capital markets is responsible for the counterparty risk related to interest rate and currency derivatives associated with customer trading

and Capital Market's trading in interest rates and currency.

5.1.2 REPORTING OF COUNTERPARTY RISK

To ensure independent control, the risk management department is responsible for the following reporting:

- Monthly reporting of the Group's exposure in relation to selected targets and limits for Group Management.
- Quarterly reporting of the Group's exposure in relation to selected targets and limits for the Board and Group Management with supplementary comments.

Risk Management also performs 2nd line checks in this area, where the checks are organised and documented via a control plan and the results are reported to the Board.

5.2 Portfolio information

For portfolio information, please see the appendix containing standardised forms, main group 13, which deals with counterparty risk.

- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
 - ▶ Management and control Exposure
- 7 MARKET RISK
- 8. OPERATIONAL RISK
- 9 ESG RISK
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

6 Liquidity risk

Liquidity risk is the risk of being unable to fulfil obligations when they fall due or finance assets, including undesired growth, without significant extra costs.

6.1 Management and control

The management of funding risk is based on risk-based governing documents for the area of liquidity. The governing documents are adopted by the Board and apply for the strategy period, although they are revised as required and at least once a year. In connection with the governing documents, a separate contingency plan has been established for managing the funding situation during periods of turbulence in the financial markets, and the funding situation is also a key theme in the Group's recovery plan. The governance and control of liquidity risk is considered satisfactory in relation to fulfilling the risk profile requirements and strategy.

6.1.1 STRATEGIC VISION AND MANAGEMENT PROCESSES

The Bank aims to ensure that the liquidity risk will be low, and the objective is secured through:

- Sufficient liquid reserves.
- Diversification and a long-term approach to financing.
- Risk measurement.

Frameworks that support the strategic objective, including limits for survival for various time horizons, the size and quality of the liquidity reserve and the financing's duration and diversification, are determined in the governing document for liquidity risk.

6.1.1.1 ADEQUATE LIQUID RESERVES

Investments in interest-bearing securities are made for the purpose of controlling the liquidity risk. The Group shall have sufficient liquid reserves to support the survival targets. Different assets have different levels of liquidity. The composition and the size of the reserves shall be such as to satisfy all survival targets. Holding a liquidity reserve has a cost and total liquidity costs shall be the lowest possible.

6.1.1.2 DIVERSIFICATION AND A LONG-TERM APPROACH TO FINANCING

Deposits from customers represent the most important source of funding. Deposits are considered to be stable funding, so the Group shall always have a sufficiently high percentage of balance financing via deposits. Deposits with low liquidity risk shall be prioritised, while the deposits should be shall from a sufficient number of different types of depositors. Given sufficient diversification, the deposits shall be priced so that profitability is maintained.

The foreign capital market has over time come to account for a larger proportion of the Group's financing. The desired level of refinancing risk shall be achieved through diversification on different geographical markets, types of investor groups and times to maturity. Borrowing cost shall be minimised, given the guidelines given for diversification and long-term financing.

Covered bonds through the covered bond companies shall be actively used to secure stable and long-term financing, contribute to the diversification of financing and reduce financing costs. In order to ensure the greatest possible flexibility in financing opportunities, the Bank shall actively work to maintain the facilitation pace of loans that can be transferred to the institutions.

The balance of mortgages in residential property and commercial covered bond companies shall be limited so as to take into account the Group's own credit rating and general risk considerations. In general, the Bank shall follow a conservative policy and not be negatively differentiated compared with other banks' use of residential property and commercial covered bond companies as a funding source.

6.1.1.3 Risk measurement

Different parts of the balance give the Group varying levels of liquidity risk. To better understand different assets' actual liquidity risks, continuous work is required to increase knowledge of the assets' inherent liquidity risks.

Deposits give the Group liquidity risk. Different types of deposits have different risks of being withdrawn. Similarly, unused credits cause the Group liquidity risk because

the customer may choose to draw on credit. The Group therefore creates stress scenarios designed to try and describe the liquidity risks associated with the various assets.

In order to continue to finance lending activity, borrowing that matures must be refinanced. The desired growth must also be financed. The risks that arise from borrowing activities are measured via regularly updated forecasts. By combining known liquidity flows with different scenarios, the Group's total liquidity risk is measured.

6.1.2 ORGANISATION, ROLES AND RESPONSIBILITY

To ensure the satisfactory division of work between the departments and people who take positions on behalf of the Group and the departments and people responsible for settlement, calculations, control and reporting, the Group has established an organisation in which executive and controlling functions are independent of each other. The parent bank is responsible for, and manages, the liquidity and refinancing risk that arises in subsidiaries.

6.1.2.1 Control of liquidity risk

The Board's adopted liquidity risk strategy provides the Group CEO with guidelines, limits and authorisation for the management of liquidity risk. The Group CEO further delegates this according to area of responsibility. The Chief Financial Officer (CFO) has the overall responsibility for the liquidity management within the Group. The operational responsibility for the liquidity management is delegated to the chief financial officer, who is responsible for:

- Monitoring the ongoing development of the Group's liquidity situation in NOK and EUR.
- Management of the liquidity reserve.
- The Group's borrowing of foreign capital.
- Correct determination of the internal price of funding.

6.1.2.2 Identification and measurement of liquidity risk

The financial department and risk management department have a shared responsibility for identifying and measuring liquidity risks.

- The finance department is responsible for identifying and measuring the liquidity risk for foreign capital funding, including the use of covered bonds and the portion of liquid reserves invested in the market.

- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
 - ▶ Management and control
 - Exposure
- 7 MARKET RISK
- 8. OPERATIONAL RISK
- 9 ESG RISK
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

- The risk management department is responsible for identifying and measuring the liquidity risk of deposits and unused credits.

6.1.2.3 Ongoing follow up

Operational support finance is responsible for settlement and control at the transaction level, as well as updating master data and various depots. The business divisions are responsible for ensuring that liquidity events that are essential for liquidity management are reported to the finance department as soon as they are known. The CFO is responsible for ensuring that the balance of the Bank's account with Norges Bank is not overdrawn. The head of capital markets is responsible for ensuring that the Bank's accounts denominated in foreign currency are not overdrawn.

The compliance function is responsible for assessing, testing and controlling compliance with relevant regulations in this area, as well as reporting its results to Group Management and the Board of Directors.

Before any instruments that are basically new are used, the Treasury must prepare a risk analysis with associated risk mitigating measures in line with a procedure for assessing new financial instruments. The risk analysis must be approved by the CFO.

Systems for management and control shall be evaluated regularly by the Group's internal auditor.

6.1.2.4 Reporting of liquidity risk

To ensure independent control, the risk management department is responsible for the following reporting:

- Monthly reporting of the Group's exposure in relation to selected targets and limits for Group Management
- Quarterly reporting of the Group's exposure in relation to selected targets and limits for the Board and Group Management with supplementary comments.

Risk Management also performs 2nd line checks in this area, where the checks are organised and documented via a control plan and the results are reported to the Board.

Gap analyses are performed in line with the Financial Supervisory Authority of Norway's modules for self-assessment of management and control. Gap analyses provide useful information about management and control in line with external regulations and expectations.



- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
 - Management and control
 - Exposure
- 7 MARKET RISK
- 8. OPERATIONAL RISK
- 9 ESG RISK
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

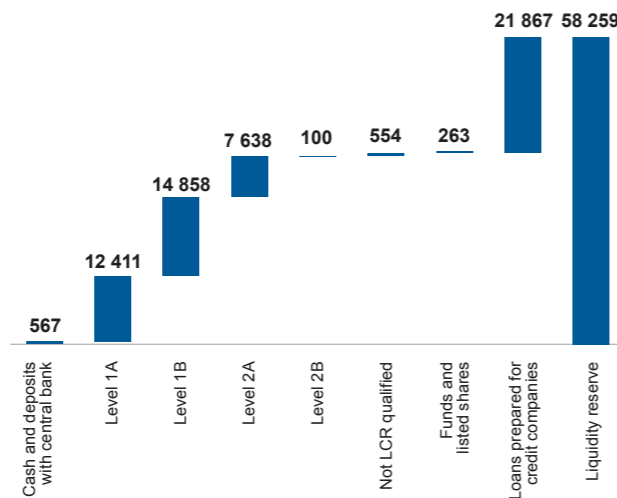
6.2 Exposure

6.2.1 LIQUIDITY RESERVE

The liquidity reserve shall at all times be large enough to satisfy government requirements, rating agencies and internal survival targets. At year end, the liquidity reserve was NOK 58.3 billion, given the financial group's internal limitation on transferring mortgages to the covered bond companies.

The liquidity reserve shall consist of liquid assets of good quality, without encumbrances. The liquidity reserve at the start of the year contained cash, access to loans from Norges Bank, bonds and certificates, listed shares, and loans prepared for sale to residential property and commercial covered bond companies. Figure 6.1 indicates the composition and quality of the liquidity reserve. FIGURE 6.1: The composition and quality of the liquidity portfolio

FIG. 6.1 The composition and quality of the liquidity portfolio
NOK millions



6.2.2 SURVIVAL

For the purpose of supporting the objective of low liquidity risk, different survival goals are established at different time horizons.

6.2.2.1 Survival according to liquidity coverage ratio

Liquidity Coverage Ratio (hereinafter LCR) defines a stress scenario that lasts for 30 days. Information about the Group's consolidated LCR for total currency, as well as descriptions of key factors related to the LCR, can be found in forms 7.2 and 7.3 in the appendix containing standardised forms.

6.2.2.2 Survival in a situation without access to senior funding

In order to ensure long-term survival, a framework has been established in line with the strategic vision that is designed to ensure survival for 12 months. The measurement method used is the Financial Supervisory Authority's refinancing capacity under stress, hereinafter

referred to as RCS. RCS measures the mortgages available for securitisation after a 30 per cent fall in house prices relative to loan maturity in the next 12 months and must be higher than 100 per cent. The development in recent quarters is shown in Figure 6.2.

6.2.2.1 Intraday survival

In order to ensure that the Group is able to deal with planned and unforeseen intraday liquidity events, a limit has also been established for the liquidity available in Norges Bank.

FIG. 6.2 Refinancing capacity under stress (RCS)
Per cent

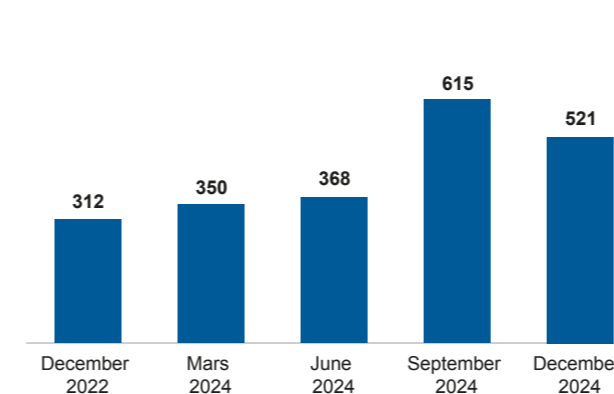
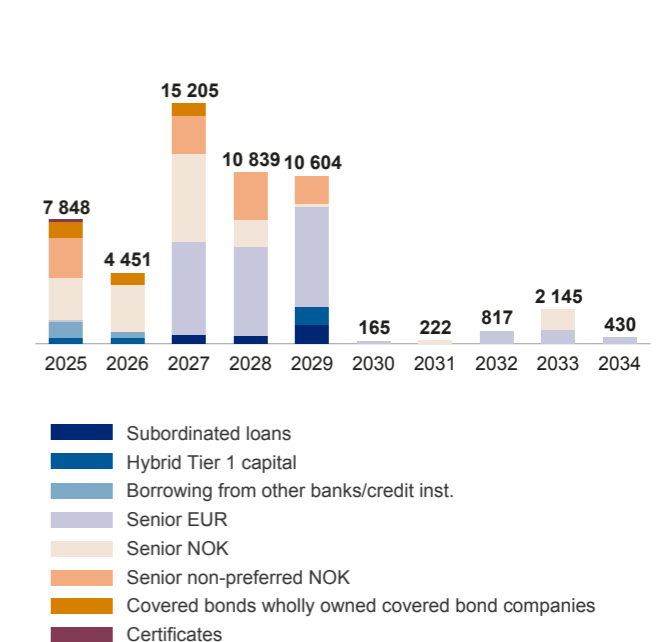


FIG. 6.3 Maturity structure
NOK millions



- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
 - Management and control
 - Exposure
- 7 MARKET RISK
- 8. OPERATIONAL RISK
- 9 ESG RISK
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

6.2.3 DIVERSIFICATION AND LONG-TERM APPROACH TO FINANCING

Liquidity risk is reduced by the diversification of financing over different markets, financing sources, instruments, terms and currencies. Total financing, consisting of equity, customer deposits, loans transferred to mortgage credit and commercial covered bond companies and market financing, was NOK 297 billion at year end. The market financing alone on the same date was NOK 52.7 billion.

6.2.3.1 Long-term financing

Net Stable funding Ratio (hereinafter called NSFR) describes the degree to which the financial group is long-term funded. Information about the consolidated NSFR for total currency can be found in Form 7.4 in the appendix containing standardised forms.

Of the Group's total funding volume of NOK 52.7 billion mentioned above, NOK 7.8 billion had to be refinanced in 2025. The average term for the Group's market financing

was 3.1 years at year end. Figure 6.3 shows the maturity structure for the Group's market financing.

6.2.3.2 Diversified financing

Figure 6.4 shows the financial group's sources of funding as at the end of the year.

To ensure other diversification of financing than different maturities and funding sources, frameworks have been established for reliance on market funding, use of covered bonds as a funding source and diversification of deposits.

At the end of the year, the financial group's funding in EUR represented 38.2 per cent of total market funding and 10.9 per cent of total liabilities on its own balance sheet.

FIG. 6.4 The Group's sources of funding
Per cent

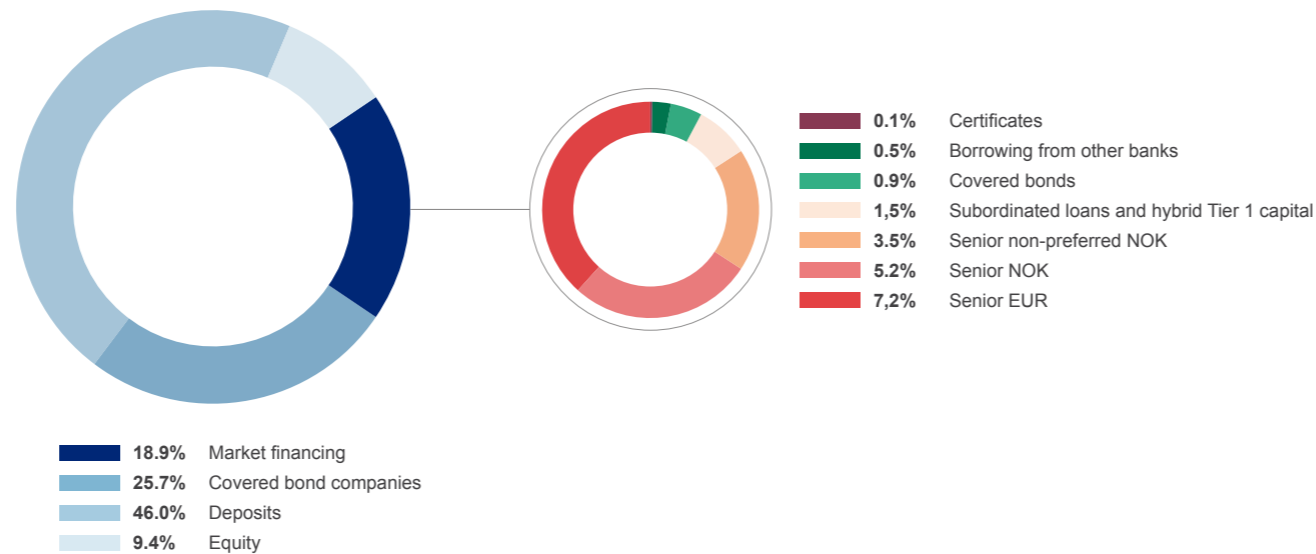
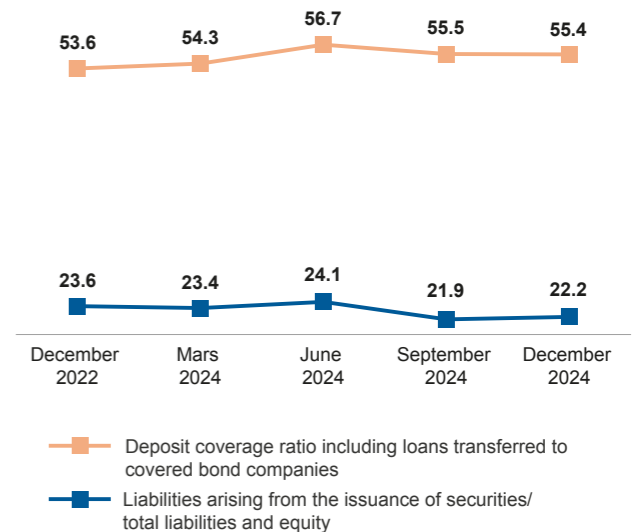


FIG. 6.5 Deposit coverage ratio and reliance on market funding
Per cent



- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
- 7 MARKET RISK
 - ▶ Management and control
 - Portfolio information
- 8. OPERATIONAL RISK
- 9 ESG RISK
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

7 Market risk

Market risk is the risk of loss due to changes in observable market variables such as interest rates, foreign exchange rates and shares/equity capital certificates. The risk associated with falls in value in the real estate market is also included in market risk. So is the risk of changes in the market value of bonds, certificates and funds due to general changes in credit spreads.

The financial group does not have a trading portfolio and has currency exposure below the threshold level for calculating associated capital requirements and capital requirement for market risk under Pillar 1 is therefore not calculated. However, under Pillar 2, capital requirements are calculated for different types of market risk. Please refer to the notes in the annual report for a description of the accounting treatment of financial instruments.

7.1 Management and control

Management of market risk is based on risk-based governing documents for the market risk area. The governing documents are adopted by the Board and apply for the strategy period, although they are revised as required and at least once a year. The Group's governance and control of market risk is considered satisfactory in relation to fulfilling the risk profile requirements and strategy.

7.1.1 STRATEGIC VISION AND MANAGEMENT PROCESSES

According to the overall risk strategy, the Group must only assume limited market risk. Therefore, the strategic goal is a group with limited market risk but one that at the same time maximises the return within the applicable framework.

7.1.1.1 Interest rate risk

The purpose of managing interest rate risk is to ensure that the financial group's interest rate risk exposure is known and that it is commensurate with the risk profile and current limits for the area. The limits take into account interest rate risk in total currency as well as interest rate risk in NOK and in EUR.

Interest rate risk is measured and reported as the total change in value of balance sheet items and non-balance sheet items (economic value of equity (EVE)), as well as the effect on net interest income (NII) of shifts in the yield curve. Measurements are made on a daily basis. For EVE, limits have been set for the magnitude of the permitted effect given the six prescribed shock scenarios in line with the EBA's guidelines for managing interest rate risk in the bank book. NII is managed by the collective Group Management in quarterly corporate governance meetings, as well as by the Group CEO through decisions on interest rate adjustments following consideration by the Group's Interest Rate Committee.

Frameworks and associated calculations take into account administrative interest rate risk, which is the effect of the time it takes in practice from when an interest rate change occurs in the market to when the terms for deposits and loans with variable interest rates are adjusted.

For the most part, the Bank's lending to customers is floating lending provided on the terms and conditions applicable at the time. The approval rate in Norway has historically been high, and the loans are, therefore, considered to have a high probability of repricing. Fixed-rate loans account for a very small proportion of the loan pool, and any costs related to premiums for early repayment are charged to the customer.

The Bank's deposit pool is mainly subject to current rates and NIBOR deposits and is, therefore, defined as stable in that there is a low probability of withdrawals in the event of changes to the policy rate. As a result of high approval in the event of changes to the policy rate, all deposits are considered to have a high probability of repricing as a result of changes to the policy rate. The average and longest interest rate adjustment period as at the end of the year is used as a basis for deposits with no maturity approximately equal to 8 weeks.

In line with the EBA's guidelines for managing interest rate risk in the bank book, we calculate the effects on profit caused by an immediate parallel upward and downward shift in yield curves of 200 basis points, with a time horizon of 12 months. The calculation assumes a static balance

sheet, roll-out of interest rate agreements and reporting deadlines. The effect on the market value of interest sensitive instruments is calculated based on the six specified shock scenarios. Information about the effects on profit and the market values of interest rate sensitive instruments caused by the shock scenarios is provided in form 20.2 in the appendix containing standardised forms.

To minimise the Bank's interest rate risk, interest rate swap agreements are used. Hedging transactions are conducted with reputable Norwegian and foreign banks in order to reduce own risk. Derivative business is linked to ordinary banking and is carried out to reduce risks related to the Bank's borrowing in financial markets, and to reveal and reduce risks related to customer activities. The interest rate risk is also limited through frameworks for the maximum weighted time to maturity and duration in the securities portfolio.

7.1.1.2 Currency risk

Currency risk arises when differences exist between assets and liabilities in the individual currency. The currency risk is measured based on the combined net currency position and the net position in the various currencies.

The aim of the currency activities is to safeguard customers' need for foreign exchange trading, foreign currency funding and international money-transfer services, and to secure the currency positions that occur within the financing/liquidity and management of securities.

Activities related to currency turnover shall at all times occur within the adopted guidelines, frameworks and authorisations. The frameworks define quantitative targets for maximum currency exposure, measured in NOK. There are frameworks for net positions in each currency, as well as total absolute sum of net positions per currency. The currency risk is quantified and monitored continuously.

7.1.1.3 Property risk

Property risks are market risks associated with exposure in property. This includes ownership positions and shares in commercial property, property companies, property funds as well as direct ownership of properties, including our own bank buildings and property for our own or employee use.

- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
- 7 MARKET RISK
 - ▶ Management and control
 - Portfolio information
- 8. OPERATIONAL RISK
- 9 ESG RISK
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

7.1.1.4 Equity risk

Equity risks arise from the ownership of shares, equity capital certificates or other equity instruments that derive the value determined by market developments.

In line with the governing document for market risk, a specific framework for investments in strategic and financial share positions has been established. Strategic share positions means "investments to contribute to growth and development in the market area" and "strategic stakes in relation to the banking business". Financial share positions are short-term or long-term investments with the goal of providing the best possible returns. In measuring exposure to the market risk frameworks, the market value of investments is used.

7.1.1.5 Spread risk

Spread risk is risk of loss on a change in the mark-up against the reference rate on the financial group's investments. Mark-up against the reference index consists of both credit risk and liquidity risk and is part of the Bank's total market risk assessment.

7.1.2 ORGANISATION, ROLES AND RESPONSIBILITY

To ensure satisfactory division of work between the departments and the people who take positions on the Group's behalf and the departments and persons responsible for settlement, control and reporting, the Group has defined different roles and responsibilities.

7.1.2.1 Management of market risk

The Board's adopted governing document for market risk provides the Group CEO with guidelines, limits and authorisation for the management of market risk. The Group CEO further delegates this according to area of responsibility. Market risk that arises in subsidiaries is managed by the parent bank.

7.1.2.2 Responsibility for market risk

The Group CEO bears overall responsibility for strategic equity investments and real estate property investments. The CFO bears overall responsibility for managing the Group's interest rate risk as an effect on EVE, currency risk and spread risk, as well as financial investments in equities and trading in climate allowances. Operational responsibility for managing interest rate risk as an effect

on EVE, currency risk and spread risk is delegated such that the CFO is responsible for the Group's interest rate risk as an effect on EVE and spread risk, while the head of currency/interest rate brokerage is responsible for the Group's currency risk

Interest rate risk as an effect on NII is managed by the collective Group Management in quarterly corporate governance meetings, as well as by the Group CEO through decisions on interest rate adjustments following consideration by the Group's Interest Rate Committee.

Before any instruments that are basically new are used, the Finance Department must prepare a risk analysis with associated risk mitigating measures in line with a procedure for assessing new financial instruments. The risk analysis must be approved by the CFO.

7.1.2.3 Responsibility for settlement, data quality, calculations and framework control

The head of operational support finance is responsible for settlement and control at the transaction level, data quality, following up counterparty exposure (collateral management) and the production and control of internal and external reports. The head of capital management and corporate governance is responsible for pricing securities portfolios for use in market risk calculations and developing models for measuring interest rate risk, as well as measuring interest rate risk. The head of capital management and corporate governance is also responsible for the forecasting process and the associated model for use in corporate governance meetings. The head of deposits and the head of financing are responsible for preparing decision support documentation for the Bank's Interest Rate Committee. The risk manager for market and liquidity risk is responsible for calculating equity risk, spread risk, currency risk, real estate property risk and framework control, as well as monitoring the measurement of interest rate risk measurement.

The compliance function is responsible for assessing, testing and controlling compliance with relevant regulations in this area, as well as reporting its results to Group Management and the Board of Directors.

The internal auditor must review the Group's identification, measurement, monitoring and control of market risk processes at regular intervals.

7.1.2.4 Reporting market risk

To ensure independent control, the risk management department is responsible for the following reporting.

- Monthly reporting of the Group's exposure in relation to selected targets and limits for Group Management.
- Quarterly reporting of the Group's exposure in relation to selected targets and limits for the Board and Group Management with supplementary comments.

The head of the capital and corporate governance department must ensure reports are submitted to the CFO on an ongoing basis in the event of significant realised or unrealised losses in the securities portfolio.

Risk Management also performs 2nd line checks in this area, where the checks are organised and documented via a control plan and the results are reported to the Board.

Gap analyses are performed in line with the Financial Supervisory Authority of Norway's modules for self-assessment of management and control. Gap analyses provide useful information about management and control in line with external regulations and expectations.

- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
- 7 MARKET RISK
 - Management and control
 - ▶ Portfolio information
- 8. OPERATIONAL RISK
- 9 ESG RISK
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

7.2 Portfolio information

As mentioned, as at year end the financial group had no trading portfolio and thus does not calculate market risk under Pillar 1. Capital requirements for the Bank's interest rate portfolio, properties and equity positions are included instead as credit risks in a regulatory context. Besides Form 20.2 in the appendix containing standardised forms covering interest rate risk in the bank book, it, therefore, does not contain any relevant quantitative forms for disclosing the Group's market risk in isolation, although the tables below provide descriptions of portfolios exposed to changes in observable market variables. Table 7.1 shows the interest rate portfolio as at year end by rating class.

The Bank's property investments consist mainly of its own buildings, as well as some holiday properties. Beyond this, the Bank has an ownership interest in Oslo Kongressenter Folkets Hus BA, which is recognised in the accounts as shares. Overall, large amounts of added value are associated with the Bank's properties in excess of what appears in the Bank's accounts.

The equity portfolio mainly consists of investments in associated companies and joint ventures, as well as other strategic investments. Investments in associated companies and joint ventures are described in more detail in the section on ownership risk. A detailed overview of the Bank's other investments by purpose as at year end is presented in Table 7.2.

Table 7.3 provides an overview of the net currency exposure as at year end. The currency risk is quantified and monitored continuously. The Bank was exposed to limited currency risk both during the year and at year end.

TABLE 7.1 Bonds and certificates

Rating	Market value
AAA	27 022
AA	3 264
A	499
BBB	80
BB	-
B or lower	-
Non-rated Norwegian municipalities	4 477
Other non-rated papers	220
Total bonds and certificates	35 563

TABLE 7.2 Investments distributed by purpose

Purpose	Investments	Market value
Financial investments at fair value through profit or loss	VISA Inc. (class C)	263
	NorgesInvestor Proto AS	36
	Other financial investments	0
Total		299
Strategic investments at fair value through profit or loss	Eika Gruppen AS	446
	Eika Boligkreditt AS	224
	SpareBank 1 Markets AS	90
	Eksportfinans ASA	59
	Oslo Kongressenter Folkets Hus AS	57
	EIKA VBB AS	39
	VN Norge AS	13
Other strategic investments	44	
Total		973
Sum total		1 272

TABLE 7.3 Currency exposures

Currency	Net exposure
GBP	-1
USD	-1
JPY	2
SEK	-1
EUR	-5
CHF	11
Other	10
Total	16

- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
- 7 MARKET RISK
- 8. OPERATIONAL RISK
 - ▶ Management and control
 - Minimum eligible capital requirement
- 9 ESG RISK
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

8. Operational risk

Operational risk is the risk of losses resulting from:

- People: violations of routines/guidelines, lack of competence, unclear policy, strategy or routines, internal failures.
- Systems: failure of ICT and other systems.
- External causes: crime, natural disasters and other external causes.

8.1 Management and control

Management and control of the Group's operational risk is based on the governing document adopted by the Board. The document establishes the Board's risk profile for operational risk. The overall objective is for the Group to have effective management and monitoring of operational risks, so that no incidents should be able to materially damage solvency and performance.

Through quantified limits for exposure in various categories of operational risk, the Group ensures that the risk picture is managed and followed up on an ongoing basis. The practical management of operational risk in the Group is based on the main activities described below.

8.1.1 1ST LINE'S KEY CHECKS

Key checks have been established that largely ensure that the 1st line's most significant control actions are documented in the Bank's governance, risk and compliance (GRC) system. The checks defined as key checks are the checks that, from a risk perspective, are the most important for the Bank to follow up. The procedure related to key checks is aimed at managers and employees assigned specific responsibility for facilitating and carrying out the practical work of internal control.

8.1.2 MANAGER CONFIRMATION

All managers of business and support functions are responsible for day-to-day risk management, and for ensuring good internal control exists within their area of responsibility. All managers must report on status and development in annual manager confirmations, as well as assess the risk culture as an element in analyses and reports for their areas. The summary of the management

confirmation provides the Group CEO with a good basis for determining whether SpareBank 1 Østlandet's internal control has been performed satisfactorily. The Group CEO's confirmation is submitted to the Board of Directors in a specific report every year. The report also contains information about whether the risk management has been performed satisfactorily, including whether procedures, policies and Acts/Regulations are being complied with or not. The work on manager confirmations is coordinated by the risk management department.

8.1.3 2ND LINE'S CHECKS

The Group's 2nd line function must ensure that there is a control plan. A set of checks is defined on the basis of a risk-based approach. The control plan must be revised annually. The checks can consist of mapping and assessing procedures and systems, spot checks, data analysis and general ongoing monitoring. Where relevant, a report on the checks is prepared and distributed to various risk owners. This contains the results of the check and an assessment of quality based on the result of the check. Any improvement measures are registered in the GRC system for follow-up. The status of the progress of the control plan is reported to the Risk Committee and the Board in quarterly risk reports.

8.1.4 LOSSES AND INCIDENTS

The Group has systems and routines for registering undesired incidents. Such registration enables the organisation to learn from the incidents and take the necessary measures to reduce the likelihood of similar incidents occurring again.

Undesired incidents means incidents arising from:

- Human error.
- Weaknesses in routines or systems.
- Crime.
- Operational incidents.

and where the consequences entail or could result in:

- Financial loss.
- Breach of legal requirements.
- Injuries/negative consequences for employees.
- Reputational loss.

Operational losses and incidents shall be registered in the GRC system and followed by in accordance with the defined guidelines.

8.1.5 CUSTOMER COMPLAINTS

The Group has a centralised complaint system that seeks to safeguard the Bank, the Bank's customers and other contractual partners. The scheme satisfies the Financial Supervisory Authority of Norway's guidelines for complaint management. The purpose of this scheme is to ensure that all complaints are given satisfactory treatment in line with the Bank's principles of complaint processing and at the same time contribute to adequate consumer protection in line with the Financial Supervisory Authority of Norway's guidelines. The system shall also ensure that the Bank gains a better overview of the operational risk and can thus analyse the complaints to determine whether they are due to systematic errors. The extent of complaint cases and their outfall are reported quarterly to the Board. In addition, complaints are reported annually to the Financial Supervisory Authority of Norway.

8.1.6 CONTINUOUS IMPROVEMENT

The risk management department registers and follows up suggestions for improvement based on reports from the internal audit and measures based on recommendations from the Financial Supervisory Authority of Norway or other independent control bodies through the GRC system. The measures/recommendations that are identified by internal quality reviews from compliance checks, risk assessments, management verifications, etc. are also followed up in the same way. The Risk Management Department reports the status of measures to Group Management, the Risk Committee and the Board twice a year.

8.1.7 RISK ANALYSES

Risk Management is responsible for ensuring that the Group has adequate methods and procedures for carrying out risk assessments. The Group's risk strategy and policy stipulate that risk assessments must be carried out at least once a year or more frequently when special circumstances warrant it. Such special circumstances could be new strategic opportunities, changed social conditions, changed framework conditions and/or significant changes in business models, products, systems and processes.

- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
- 7 MARKET RISK
- 8. OPERATIONAL RISK
 - Management and control
 - ▶ Minimum eligible capital requirement
- 9 ESG RISK
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

A guiding principle is that risk assessments should be initiated by the Bank's 1st line.

8.1.8 THE FINANCIAL SUPERVISORY AUTHORITY OF NORWAY'S RISK MODULES

Gap analyses are performed in relation to the Financial Supervisory Authority of Norway's modules for self-assessment of management and control, as well as the Cobit framework for evaluating ICT operations. The gap analyses provide useful information about management and control in line with external regulations and expectations.

8.1.9 NEW AND REVISED PRODUCTS, SOLUTIONS AND PROCESSES

New and significantly changed products, solutions and processes must undergo sound and effective quality assurance before they are put into production. This must be done to avoid the unintentional or unwanted introduction of operational risk. The quality assurance must include a risk assessment in which key resources participate. A specific policy exists for development and implementation. The policy provides guidelines for which projects and deliverables must be scored and risk assessed, and at what level in the organisation implementation decisions should be taken. The level at which decisions should be taken depends on the materiality and criticality of the product or solution. The policy is supplemented by specific procedures and a specific project management tool, which ensures compliance with, and follow-up of, policies and processes.

8.2 Minimum eligible capital requirement

The Group uses the basic approach to calculate the eligible capital required to cover operational risk. Information about the Group's requirements for eligible capital for operational risk can be found in Form 16.2 in the appendix containing standardised forms.

- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
- 7 MARKET RISK
- 8. OPERATIONAL RISK
- 9 ESG RISK
 - ▶ Strategic objective and management processes
 - Risk management
 - Standards
 - Tools
 - Roles and responsibilities
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

9 ESG risk

ESG risk is defined as the risk of loss due to the Group's exposure to counterparties being adversely impacted by ESG factors. The Bank assesses counterparty risk in relation to environmental, social and governance risks.

Environmental risk (E) is the risk of loss as a result of the Group's exposure to counterparties being adversely affected by environmental factors, including climate change/changes in nature, and changes in regulations and consumption habits due to the transition to a zero emissions society.

Social risk (S) is the risk of loss due to the Group's exposure to counterparties being adversely impacted by social conditions, labour rights, human rights, poverty, etc.

Governance risk (G) is the risk of loss due to the Group's exposure to counterparties being adversely impacted by poor corporate governance of the counterparty.

9.1 Strategic objective and management processes

Being a clear driving force behind a sustainable transition is one of the four main goals in the Bank's strategy. In the opinion of the Bank, the main climate-related risk is linked to transition risk. Therefore, one strategic focus area is to be a driving force behind sustainable transition, since climate change is considered to be a highly material factor for the Group and society. The Bank manages climate impacts through the Group's own environmental footprint and strategic sustainable financing initiatives. In order to operationalise the sustainability goal in the Group's overall strategy, and the strategic policies and framework, the Bank has adopted an ambition with two main goals. These goals address the long-term objective of helping to create a sustainable zero-emission society that lives within planetary boundaries and more short-term goals concerning, for example, cutting emissions and improving energy efficiency in the retail and corporate market portfolios.

Commitments for new or existing customers are assessed in relation to the Bank's corporate social responsibility and sustainability policies. Respect for international labour and human rights, as well as equality and diversity are key in the work on sustainability. The Bank assesses its social impacts on society through the sustainability strategy and other policies in order to create value for all of the Bank's key stakeholders. The assessments designed to mitigate social risk particularly target sectors and activities the Bank does not wish to finance, any risk of breaching working environment and labour rights, any risk of breaching human rights and any risk of failing to comply with laws, especially in relation to economic crime and money laundering. The Bank also sets its own sustainability requirements for suppliers and partners, which include several very important requirements concerning social conditions. Internally, the Bank focuses strongly on social conditions with goals targeting, for example, gender and diversity. Contributions to achieving long-term sustainability goals must be reflected in the determination of the individual employee's salary level.

The focus on governance risk is key, and the Bank's policies cover risk management systems such as ethical assessments, strategy, transparency and inclusion, managing conflicts of interest and internal whistleblowing procedures. Such policies are important in mitigating the risk of contributing to unwanted business activities.

The Bank has identified transitional risk in the retail market based on its current investment activities and investment objectives in relation to environmental targets and the EU Taxonomy. To counter this risk and help improve energy efficiency in homes, the Bank has established specific goals and measures for its loan customers. In the corporate market, the largest borrowing industries are agriculture and property, and these are considered to present some transition risk. In the same way as in the retail market, goals and relevant measures have been established. The climate and environmental risk in the Bank's liquidity portfolio is low since it invests heavily in Norwegian municipal and government bonds. The Bank is working to increase its share of ESG investments in the portfolio and has set targets for this area. The Group issues green bonds and has developed its own framework for this area. The

Bank does not manage its own funds. Therefore, please refer to the SpareBank 1 Alliance's joint sustainability mapping and labelling of mutual funds.

9.2 Risk management

ESG factors are affected either directly through operations or indirectly through, primarily, the loan portfolio. ESG factors are managed directly, mainly through operational risk, credit risk, compliance risk, conduct risk and liquidity risk, and are integrated into the methods, procedures, governing documents, policies and assessments within these risk categories. ESG factors are measured, identified and monitored as risk drivers using the various risk categories. Several direct analyses are also conducted that identify and measure how sensitive the Bank's activities and exposures are to ESG risk. If requirements are breached, exclusion takes place in line with the various policies. The Bank also assesses the impacts companies in the corporate market portfolio have on ESG factors in loan applications based on set policies and limits. Companies that breach requirements must undergo a stricter assessment that can result in exclusion.

ESG factors are assessed in loan and investment decisions, as well as in assessments of suppliers and partners. These requirements are part of the guidelines that are included in decision-making and are monitored as ESG risk. The Bank carries out ESG risk assessments on an ongoing basis and analyses the risk to which the Bank is exposed. The Bank also conducts double materiality analyses to identify activities and areas that require greater attention in order to keep the risk low. These assess a variety of environmental, social and governance risks in the short, medium and long term, as well as their significance for the Bank.

Environmental risk, social risk and governance risk are seen as risk drivers that can impact credit risk in that these factors can affect probability of default (PD), increase loss given default (LGD) or affect exposure in the event of default (EAD). Collateral depreciation and impacts on the loan to value (LTV) ratio can also be consequences

- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
- 7 MARKET RISK
- 8. OPERATIONAL RISK
- 9 ESG RISK
 - Strategic objective and management processes
 - Risk management
 - Standards
 - Tools
 - Roles and responsibilities
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

of ESG risk. Creditworthiness can also be affected by the operational or reputational risks of, for example, ESG incidents that affect the value of the business model. Liquidity and financing risk may be affected by ESG risk, such as in the event of an unexpected repricing of securities resulting in net cash payouts or the depletion of liquidity buffers. ESG factors can impact market risk in the event of changes to the supply of, and demand for, financial instruments. This can have a subsequent impact on risk returns and valuations of equities, bonds and commodities. The activities of the Group and its suppliers can, as an operational risk, be affected by ESG factors, which can also lead to reputational risk.

9.3 Standards

The Bank reports in line with the CSRD and in connection with this has identified material impacts, risks and opportunities. The Bank prepares an energy and climate report. The calculations of emissions in this are based on the framework from the Partnership for Carbon Accounting Financials (PCAF). The Bank is Eco-Lighthouse certified and has signed up to a number of different global initiatives such as the UN Principles for Responsible Banking, the Net Zero Banking Alliance, the Collective Commitment to Climate Action and the European Climate Pact. More information about the Bank's obligations in relation to the environment, social conditions and governance can be found on its website and in its sustainability report.

9.4 Tools

The Bank actively works to reduce ESG risk via a number of activities. These include, for example, offering green products, maintaining a good dialogue with customers, various policy requirements and goals for cutting CO2 emissions and improving energy efficiency. In collaboration with the other banks in the SpareBank 1 Alliance, the corporate customer sustainability assessment tool has been further improved. The tool assesses customers' management of and inherent climate and environmental risk, social risk and management risk. The results of such assessments are used in credit assessments of individual loan applications, and they can also provide valuable data for reporting, stress tests and future model development.

In order to minimise the risk of the Bank's investments conflicting with the Bank's guidelines for corporate social responsibility and sustainability, an assessment must be carried out prior to decisions on investments that are categorised as having a moderate or high risk. This assessment is carried out using a special risk management tool. Annual reviews are conducted of the entire portfolio in order to maintain an overview of the portfolio's holdings and the enterprises' risks within sustainability and corporate social responsibility. Breaches of policy are reported to Group Management.

The available ESG risk data is mainly procured using our own tools or purchased from a third-party supplier. Improving access to data is always a focus area, and estimates are used in cases where appropriate and other data is inadequate.

9.5 Roles and responsibilities

The Bank's sustainability strategy and framework for corporate social responsibility and sustainability are adopted by the Board, which has overall responsibility for ensuring the Bank delivers on its strategy. Group management has adopted the action plan and regularly has diverse issues related to climate and sustainability on the agenda. A risk management committee has been established to ensure good, interdisciplinary management of risk and capital related questions and issues, and a balance sheet management committee has been established for balance sheet related questions and issues. Both committees act as advisory bodies for the Group CEO. Each executive vice president is independently responsible for the goals associated with his/her area of business in the action plan, and reports on the goals to the rest of Group Management. The head of risk management is responsible for oversight and monitoring, while the head of compliance is responsible for monitoring and assessing the Bank's compliance with applicable Acts, rules and Regulations. The internal audit quality assures risk assessments.

Management decisions related to ESG factors and risk follow the Group's existing three lines, as mentioned above. ESG factors and risks are established in business strategies with business targets and are taken account of in risk-based management documents for the various risk categories. The Board of Directors adopts the documents, while the Board's Risk Committee follows up the Bank's risk exposure in all risk categories, including environmental, social and governance risk. The business areas report on ESG risk through corporate governance to Group Management and the Bank's Board of Directors. Risk is also reported to the Bank's management and the Board of Directors. Both reports are prepared on a quarterly basis.

- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
- 7 MARKET RISK
- 8. OPERATIONAL RISK
- 9 ESG RISK
- 10 OWNERSHIP RISK
 - Exposure
 - Management and control
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK

10 Ownership risk

Ownership risk is the risk that the Group will incur negative earnings from ownership interests in strategically owned companies, or that the Group must inject new equity in strategically owned companies, whether it is due to strong growth or to ensure continued operations as a result of large losses. Ownership is defined as companies in which SpareBank 1 Østlandet has a significant stake, influence or strategic interest.

10.1 Exposure

As at year end, SpareBank 1 Østlandet was exposed to ownership risk through the following proprietary positions in associated companies and joint ventures:

- SpareBank 1 Boligkreditt AS (consolidated in capital adequacy).
- SpareBank 1 Næringskreditt AS (consolidated in capital adequacy).
- SpareBank 1 Kreditt AS (consolidated in capital adequacy).
- BN Bank ASA (consolidated in capital adequacy).
- SpareBank 1 Gruppen AS.
- SpareBank 1 Utvikling DA.
- SpareBank 1 Betaling AS.
- SpareBank 1 Bank og Regnskap AS.
- SpareBank 1 Gjeldsinformasjon AS.
- SpareBank 1 Forvaltning AS.
- SpareBank 1 Mobility Holding AS (associate in the subsidiary SpareBank 1 Finans Østlandet AS).

10.2 Management and control

The SpareBank 1 banks conduct their alliance work through the jointly owned holding company SpareBank 1 Gruppen AS. SpareBank 1 Gruppen is owned by SpareBank 1 Østlandet, SpareBank 1 Sør-Norge, SpareBank 1 Nord-Norge, SpareBank 1 SMN, Samarbeidende Sparebanker AS, as well as the Norwegian Confederation of Trade Unions (LO) and trade unions associated with LO. SpareBank 1 Kreditt AS and SpareBank 1 Betaling AS are owned by all the banks in the SpareBank 1 Alliance. SpareBank 1 Boligkreditt AS and SpareBank 1 Næringskreditt AS are owned by all the banks in the SpareBank 1 Alliance except SpareBank 1 Sør-Norge.

The Group CEOs of the owner banks, SpareBank 1 Østlandet, SpareBank 1 Sør-Norge, SpareBank 1 Nord-Norge, SpareBank 1 SMN and the chair of Samarbeidende Sparebanker AS, as well as the Norwegian Confederation of Trade Unions (LO), as owners of the company, sit on the Board of SpareBank 1 Gruppen. The finance director of SpareBank 1 Østlandet joins the Board meetings of SpareBank 1 Boligkreditt AS, SpareBank 1 Næringskreditt AS and BN Bank ASA. SpareBank 1 Østlandet is similarly represented on the Boards of SpareBank 1 Kreditt AS and SpareBank 1 Betaling AS.

¹⁾ Kredittbanken ASA from 1 January 2025 onwards.

- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
- 7 MARKET RISK
- 8. OPERATIONAL RISK
- 9 ESG RISK
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
 - ▶ Management and control
 - Regulatory changes and compliance risk
- 12 CONDUCT RISK

11 Compliance risk

Compliance risk is the risk that the Group will incur public sanctions, penalties, other criminal sanctions, loss of reputation or financial losses as a consequence of failure to comply with acts, regulations, official guidelines and mandatory public orders.

11.1 Management and control

Management and control of the Group's compliance risk is based on the Board of Directors' adopted compliance risk guidelines. These lay down the Board of Directors' risk tolerance for compliance risk. The Group has a low tolerance for compliance risk and zero tolerance for deliberate breaches of the regulations. No compliance incidents may significantly impair the Group's financial strength, performance or reputation. The Group's business operations must be organised so as to eliminate fines and sanctions. This overall risk tolerance is concretised and operationalised through quantifiable parameters in different sub-areas.

The aforementioned guidelines also regulate responsibilities, including guidelines for all employees' responsibility for regulatory compliance. The Group's management is responsible for implementation and compliance with laws and regulations, while each individual employee is responsible for day-to-day, ongoing compliance.

The Group has its own compliance function, which is organised independently of the operative business management. The Group's compliance function is responsible for assessing whether the Group's guidelines, routines and systems contribute to ensuring compliance with relevant regulations, as well as controlling regulatory compliance. The compliance function shall also monitor regulatory development and make impact assessments of known and notified regulatory changes. The Group's compliance function works according to a risk-based annual plan. If regulatory development or other circumstances so dictate, the annual plan will be adjusted on an ongoing basis.

The guidelines approved by the Board of Directors set requirements for internal follow-up and reporting, including requirements for processes to ensure and follow up on regulatory compliance. Incidents and violations in the compliance area will be registered in the same manner as operational risk is registered and followed up via the incident database.

The Chief Compliance Officer reports status within the area of compliance to the Board on a quarterly basis. This includes status in relation to the Board's risk tolerance for compliance risk, compliance risk assessments, results of compliance checks and information about regulatory developments.

11.2 Regulatory changes and compliance risk

The extent of regulatory changes was significant again in 2024. Extensive regulatory changes of relevance for the Bank's framework conditions are also expected in the coming years. The Group has a considerable focus on regulatory developments and compliance risk. Follow-up of the Bank's adaptation to and implementation of new and changed regulations is part of the compliance function's annual plan.

- 1 INTRODUCTION
- 2 THE GROUP'S RISK AND CAPITAL MANAGEMENT
- 3 CAPITAL
- 4 CREDIT RISK
- 5 COUNTERPARTY RISK
- 6 LIQUIDITY RISK
- 7 MARKET RISK
- 8. OPERATIONAL RISK
- 9 ESG RISK
- 10 OWNERSHIP RISK
- 11 COMPLIANCE RISK
- 12 CONDUCT RISK
 - ▶ Management and control

12 Conduct risk

Conduct risk is the risk of public sanctions, criminal sanctions, loss of reputation or financial loss as a consequence of the Bank's business methods or the employees' conduct materially jeopardising customers' interests or the integrity of the market.

12.1 Management and control

Over time, the regulation of the financial industry has evolved to increasingly include regulations to protect customers and consumers. The Group's conduct risk is therefore closely associated with the Group's compliance. The Board has adopted policies for the governance and control of conduct risk. These are an integral part of an overall governance document for compliance and conduct risk. This governance document clarifies how important a topic this is for the Group. The guidelines include, among other things, the Board of Directors' risk tolerance in the area. The Group has a low tolerance for conduct risk. This means that no single conduct incidents should be able to materially damage the Group's financial strength, performance or reputation. The overall risk tolerance in the area is concretised and operationalised through quantifiable parameters for risk tolerance in different sub-areas.

The guidelines also regulate responsibility, follow-up and reporting requirements, and the main principles for ensuring good business conduct. All employees are required to contribute to ensuring that customers' needs and entitlements are adequately handled, including by providing professional and honest customer services to ensure that the Bank's customers can make clear and well-informed choices.

Key instruments to ensure good business conduct include, among other things, ethical guidelines, internal information and training initiatives, implementation of risk analyses, a well-functioning procedure to handle customer complaints – including root cause analyses and improvement measures – and an appropriate whistleblowing channel. On the establishment of or changes to products and services, the necessary quality assurance must be carried out prior

to launch. Payment and remuneration schemes must be designed to ensure and encourage appropriate conduct and good conduct.

The Chief Compliance Officer reports status for conduct risk to the Board on a quarterly basis, as an integral part of the quarterly compliance report. This includes status in relation to the Board's risk tolerance for conduct risk.

ABOUT SPAREBANK 1 ØSTLANDET

SpareBank 1 Østlandet is Norway's fourth largest savings bank group, with 1,100 proudly professional employees. In our 178 years, we have built up a solid market position in Østlandet (Eastern Norway) by being accessible and providing credit to people and companies in our rural and urban markets. We currently have 37 branches across Oslo, Viken and Innlandet.

Through the bank's subsidiaries, and the SpareBank 1 alliance's affiliated product companies and ownership interest in Fremtind insurance, we are a complete finance house for our retail and corporate customers. We are a publicly listed, independent financial group headquartered in Hamar, with deep roots in Østlandet, and have contributed to value creation in the market area through several generations.

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