

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

Hamar, February 2022

Diversity and equal opportunity

Part 1: Status of gender equality

Gender balance in the business

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

We have 702 permanent employees in the Bank, 52 per cent of whom are women and 48 per cent of whom are men. We have 9 temporary employees, five of whom are women and four men. In addition to this, the Bank employs temporary workers hired in from staffing agencies to replace employees who are on leave, away sick, etc.

The proportion of management positions with personnel responsibilities held by women has increased from 36 per cent in 2020 to 42.2 per cent in 2021. We are still slightly below the 45 per cent target for the strategy period. There is low turnover among managers, and it will therefore take some time to reach the target figure. The proportion of women in the CEO's management team has increased by 10 per cent and Group Management now consists of four women and six men. The Bank's Board of Directors has four women and four men.

The increase in the proportion of women in management positions is related to the management development programme, 'Take Off', which is specifically targeted at women, as well as targeted efforts in recruitment processes.

Full-time – part-time by gender

Age	Part-time		Full-time		Total
	Women	Men	Women	Men	
> 30 years	2	.	30	20	52
30-39 years	5	.	66	74	145
40-49 years	8	1	74	74	157
50-59 years	15	2	98	97	212
Over 60 years	11	4	53	68	136
Total	41	7	321	333	702

Of the 702 permanent employees, 93 per cent work full time and 7 per cent part time. The part-time employees comprise seven men and 41 women. Of these, 28 people applied for a reduced-time position themselves due to care obligations, age, or capacity for work. A project was started in 2021 to investigate the incidence of unwanted part-time work among those who have not applied for it themselves. None of those who responded to the survey stated that they had involuntary part-time work.

Salary by gender and employment groups

Women's average salary as a % of men's average salary	2021	2020	2019
Line functions	88.6%	89.6%	90.6%
Managers and more demanding professional positions	98.9%	104.3%	93.3%
Total	82.1%	81.2%	

In operational positions, which include advisers, case officers and so on, women's average pay was 88.6% of men's pay at year end 2021, compared with 89.6% in 2020. Among employees in management positions and more demanding technical positions, women's pay was 98.9 per cent of men's pay, compared with 104.3 per cent in 2020.

The Bank uses external position assessment systems (HAY) to classify position categories and analyse salary data. In connection with salary negotiations, the figures are broken down by the individual employment category and gender. The analyses are not adjusted for any structural factors related to age, different fields, seniority, level of education, etc.

Parental leave

In the 2021 calendar year, both women and men took an average of 14 weeks of parental leave. The figure does not reflect the total leave taken per employee because the leave can span two calendar years. All of them remained employees after the leave.

Turnover and recruitment

There was a slight increase in turnover from 2020 to 2021. In 2021, it was 2.7 per cent among women and 2.4 per cent among men, compared with 1.6 per cent and 2.3 per cent respectively from the previous year. Of the new external recruits in 2021, 39 per cent were women and 61 per cent men.

The Bank has set a goal of achieving gender balance among applicants in all job categories and we are committed to avoiding discrimination of any kind in a recruitment context. In 2021, we advertised 99 positions and had a total of 1,896 applicants. We can see that gender differences among applicants have widened. In 2021, 42 per cent of applicants were women and 58 per cent were men, compared with 48 per cent female applicants and 52 per cent male applicants in 2020.

Percentage of applicants by age categories

21-25	26-30	31-35	36-40	41-45	46-50	51-55	56-60	61-65	Over 65	Age unknown
450	591	352	169	124	92	84	49	13		13

We have the most applicants in the younger age categories. The number of applicants decreases markedly from the age category 36-40 years and further upwards.

Part 2: Our work on gender equality and against discrimination

Principles, procedures, and standards for gender equality and against discrimination

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

Gender balance is important to the company, in both management and other roles, and we had a goal of increasing the proportion of female managers from 40 to 45 per cent by 2021. Equal pay for work of equal value is assessed and practised as far as possible based on objective criteria.

In our recruitment policy, we are committed to avoiding discrimination of any kind, such as matters relating to gender, parental leave for childbirth, adoption, care tasks, ethnicity, religion, beliefs, disability, sexual orientation, gender identity, gender expression, age, political views and union membership. We shall also facilitate internal mobility.

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

We have enacted life-phase policy measures where the intention is for employees to experience professional and personal development through different phases of their careers as well as enjoy a balanced relationship between their working life and personal life. The individual employee's opportunities for professional and personal development must be independent of gender, age, education, background, and origin.

How we work to ensure equality and non-discrimination in practice

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

Surveys and analysis

- HR conducts an annual assessment of risks and obstacles to gender equality in collaboration with elected officers (party-composed committee).
- Each year, HR analyses gender distribution and wage differences at different job levels, gender differences, part-time and temporary work as well as parental leave. In addition, we look at gender differences in recruitment, the proportion of female applicants and the proportion of applicants by age.
- HR investigates involuntarily part-time work through its own survey.

Analysing causes

HR analyses findings in surveys. In addition, we assess the causes of risks and decide on measures in collaboration with elected officers (party-composed committee).

Initiate measures

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

Evaluate the results of the work

The work carried out will be evaluated through annual analyses and risk assessments. Gender equality work is also assessed in connection with annual risk analysis in collaboration with elected officers.

The following section presents both measures that are integrated into daily operations, and measures that were implemented in 2021 as a result of the actual situation as well as risk mapping and analyses in the autumn of 2020.

Pay and working conditions

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

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

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

Measures implemented in 2021

- Analysis of involuntary part-time work has begun. The results will be available in 2022.
- Some employees have been granted an application for part-time work because of care obligations, disabilities, illness or age.

SpareBank 1 Østlandet has very few part-time positions, which can be a limiting factor for the inclusion of people with disabilities. The party-composed committee will therefore review our practice in 2022 and assess the possibility of increased use of part-time in the event of disability.

Recruitment

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

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

- All recruiters have documented competence corresponding to DNV's certification for recruitment personnel. This will ensure professional recruitment processes in accordance with scientific standards and legal requirements.
- We encourage the underrepresented gender to apply in job categories or environments where there is a skewed gender balance.
- Written recommendations for candidates of both genders are always presented when recruiting for managerial positions.

Measures implemented in 2021

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

Applicant statistics from 2021 show that the gender differences between applicants have increased from 2020 to 2021. We also see that we do not have a good enough gender balance and diversity of applicants for certain job categories. In 2022, we will therefore prioritise reviewing text, image use and job advertisements to assess how these appeals to different groups in society. The purpose is to ensure an increased diversity of applicants.

Promotion and development opportunities

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

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

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

Measures implemented in 2021

- Continuation of the leadership development program 'Take Off', which is specifically aimed at women. Three of the twelve participants have taken up senior positions internally, and one will take up an external position with more responsibilities.
- In 2021, 45 employees completed an internal master's programme - Digital Transformation in Finance (NTNU).

Inclusion and facilitation

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

We have the following measures as part of daily operations:

- The line manager can grant five days of paid leave, the Executive Vice President HR and Legal can grant an additional 5 days of paid leave per year.
- Flexible working hours and use of home office.
- Opportunity for support conversations with the occupational health service for particularly burdensome care obligations.
- Extended right to self-certification days (up to 8 days of self-certification leave per employer period, limited to 24 calendar days during an individual 12-month period).
- Treatment insurance that ensures rapid diagnosis, specialist medical help, surgery/treatment, physiotherapy or psychological help.
- All employees are offered extended health checks and follow-up.
- All employees receive a workplace assessment when needed and adaptation of equipment.
- In the event of disability, we have the option of physical adaptation. Among other things, we have adapted workplaces and meeting rooms for people with hearing impairments.
- The occupational health service is actively used as a sparring partner for managers and employees in a preventive and repair perspective in the event of life crises, health challenges or illness.
- Facilitation during pregnancy to stay in work as long as possible.
- Extensive facilitation and work testing in the event of sick leave.

Measures implemented in 2021

The risk assessment revealed a lack of resources/time for systematic work on integration and work training for external parties who find themselves outside the labour market. The Covid-19 situation, with most people working from home has been a limiting factor for external testing in 2021, but we have had:

- One external person on work training.
- One external person on work training for people with an immigrant background.

Opportunities to combine work and family life

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

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

- Flexible working time solutions.
- The opportunity to work from home.
- Shorter working hours in the summer.
- From the age of 64, full-time employees are entitled to one hour less daily working hours. (During the summertime period, full-time employees are entitled to ½ hour less working hours).

Measures implemented in 2021

- Adopted voluntary scheme for contractual home office.

Harassment, sexual harassment and gender-based violence

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

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

- All employees participate in an annual Ethics Week where, among other things, the code of conduct is reviewed and signed.
- Regular employee surveys are conducted with separate questions about bullying and harassment.
- We have our own procedures to ensure a low threshold for reporting concerns in the event of witnessing or experiencing harassment.
- We have procedures and a system that ensures the possibility of anonymous notification internally and externally.
- If we discover/uncover harassment internally, further investigations are carried out. If necessary, the occupational health service will also conduct investigations.
- Employees who experience or are accused of harassment are offered support interviews and guidance with an occupational health service or psychologist.
- Employees receive good help if violence is domestic violence is uncovered. They receive immediate access to professional assistance from the occupational health service and/or psychologist.
- Employees who are exposed to threatening customer behaviour are followed up by security and are offered support calls and assistance from the occupational health service.
- We conduct exercises on threatening customer behaviour to enable employees to deal with this.
- Security guards are employed in offices that are exposed to threatening customer behaviour.
- If necessary, the occupational health service is called in and debriefing and support interviews are carried out.

In the event of harassment or gender-based violence (threatening customer behaviour) from customers, we have also implemented the following measures in 2021:

- Courses have been completed with a psychologist.
- We have adopted a pilot scheme that will be implemented on 1.1.2022, where we only allow for appointments at offices exposed to such behaviour, in order to gain better control over threatening customer behaviour.
- We have identified individual cases of persons who feel exposed to bullying and/or harassment through investigations and reports of concern. Separate procedures ensure professional handling of the different cases, both of the affected parties and the working environment.

We occasionally (not annually) have cases of domestic violence. When this is discovered, they are secured professional external assistance. We are not aware that there has been gender-based violence in the workplace among colleagues in 2021.

In 2022, we will implement a new system for employee surveys. In this connection, we will consider initiating attitude work and information on measures to prevent harassment and gender-based violence.