

# Equal Opportunities and Diversity

Reporting in line with the activity and  
reporting obligation (ARP) for 2023



# Contents

1	Status of gender equality .....	3
1.1	Gender balance in the business .....	3
1.2	Full-time and part-time by gender .....	3
1.3	Salary by gender and employment groups .....	3
1.4	Parental leave .....	4
1.5	Turnover and recruitment .....	4
2	Our work on gender equality and against discrimination .....	5
2.1	Principles, procedures and standards for gender equality and against discrimination.....	5
2.2	How we work to ensure equality and non-discrimination in practice .....	6
2.3	Pay and working conditions .....	6
2.4	Recruitment .....	7
2.5	Promotion and development opportunities .....	7
2.6	Inclusion and facilitation .....	8
2.7	Opportunities to combine work and family life.....	9
2.8	Harassment, sexual harassment and gender-based violence .....	9
2.9	Summary of risk assessment.....	10

# 1 Status of gender equality

## 1.1 Gender balance in the business

Gender distribution	2023	2022	2021	2020
Proportion of women	51%	49.7%	51.6%	51.9%
Total proportion of female managers	40%	41%	42.2%	36.1%
Proportion of women on the Board of Directors	50%	50%	50%	50%
Proportion of women in Group Management	40%	40%	40%	30%

We have 782 permanent employees in the Bank, 50 per cent of whom are women. We have seven temporary employees, of which three are women and four are men. In addition to this, the Bank employs 15 temporary workers hired in from staffing agencies to replace employees on leave and who are absent due to illness. Of these, eight were men and seven were women.

The proportion of women in management positions with personnel responsibilities decreased slightly from 41 per cent in 2022 to 40 per cent in 2023. This is still slightly below the 45 per cent target. The proportion of women in the CEO's management team remains unchanged; Group Management consists of four women and six men. The Bank's Board of Directors consists of four women and four men.

## 1.2 Full-time and part-time by gender

Age	2023					2022				
	Part-time		Full-time		Total	Part-time		Full-time		Total
	Women	Men	Women	Men		Women	Men	Women	Men	
> 30	9	7	36	40	92	3	.	37	33	73
30-39			91	97	188	6	2	67	91	166
40-49	3		83	72	158	11	1	72	75	159
50-59	7	1	95	87	190	11	1	98	93	203
> 60	5	2	70	77	154	8	5	55	71	139
Total	24	10	375	373	782	39	9	329	363	740

Of the 782 permanent employees, 95.5 per cent work full time and 4.5 per cent part time. The part-time employees comprise 10 men and 24 women. Most applied for a reduced time position themselves due to care obligations, age or capacity for work. Surveys from 2022 shows that nobody works part-time who does not want to.

## 1.3 Salary by gender and employment groups

Position group	2023	2022	2021	2020	2019
Managers and more demanding professional positions	99.7%	97.8%	98.9%	104.3%	93.3%
Line functions/operational positions	93.3%	92.1%	88.6%	89.6%	90.6%
Customer adviser	99.1%	97.4%	97.6%	98.1%	96.9%
Financial adviser	97.3%	94.8%	94.8%	95.4%	93.6%
Business adviser	93.7%	92.4%	89.8%	90.0%	91.6%

All job categories	84.9%	83.6%	82.1%	81.2%	80.2%
--------------------	-------	-------	-------	-------	-------

The table shows women's average salary as a percentage of men's average salary

This shows that the pay ratio between women and men improved in most job categories from 2022 to 2023. This must be viewed in the context of us having conducted thorough analyses and having paid extra attention to this area prior to the pay negotiations for 2023.

Among employees in management positions and more demanding technical positions, women's pay was 99.7 per cent of men's pay at the end of 2023, compared with 97.8 per cent in 2022. In operational positions, which include advisers, case officers and so on, women's pay was 93.3 per cent of men's pay at year end 2023, compared with 92.1 per cent in 2022.

If we take a closer look at some of the operational positions, such as financial advisers and business advisers, women's pay is still lower than men's pay. The biggest difference between women and men is among business advisers, where women earn 93.7 per cent of what men earn. If we look at customer advisers, women earn 99.1 per cent of what men earn. Previous analyses show that we have a gender-divided internal labour market. Men are overrepresented in the highest paid job categories, while women are overrepresented in the lowest paid ones. Therefore, if one looks at all job categories as a whole, the pay gap is greater. From this perspective, the sum of all women's pay will be lower than the sum of all men's pay. Women earn 84.9 per cent of what men earn.

The Bank uses an external job evaluation method (Hay) to classify position categories and analyse pay data. The analyses are not adjusted for any structural factors related to age, seniority, level of education, deliveries, etc.

## 1.4 Parental leave

In the 2023 calendar year, 24 women and 13 men took parental leave. Women took an average of 14.7 weeks and men 12.2 weeks of parental leave. In 2022, women took an average of 21.3 weeks and men 14.8 weeks of parental leave. The figure does not reflect the total leave taken per employee because the leave can span two calendar years. In 2023, no employees chose to leave while on parental leave.

## 1.5 Turnover and recruitment

The proportion who chooses to go to another employer is relatively stable. In 2023, it was 1.93 per cent among women and 2.88 per cent among men, compared with 2.97 per cent and 2.02 per cent, respectively, from the year before. A total of 57 people left, of whom 20 retired and 37 moved to another employer.

In 2022, 30 per cent of new hires were women and 70 per cent were men. Therefore, in the 2022 ARP report, we identified a need to increase our focus on gender balance in external recruitment. We have done so successfully. In 2023, 53 per cent of new hires were women and 47 per cent were men.

### Number of positions advertised by gender and category

The Bank's goal is to achieve a gender balance among applicants within all position categories, and we are committed to avoiding all forms of discrimination in the recruitment process. We advertised 120 positions in 2023, compared with 133 in 2022. We received a total of 2,847 applications, which represents a significant increase from 1,856 the year before. However, gender differences have increased slightly since 2022, with a decrease in the proportion of female applicants to 42.6 per cent in 2023, compared with 45.4 per cent in 2022. The gender difference in applicant numbers was most marked in the management positions category, with 63.5 per cent men and 35 per cent women. Therefore, we need to intensify our work on attracting more women applicants for management positions. We can also see that the proportion of men applicants for customer adviser positions is, for the first time, higher than the proportion of women applicants. It is pleasing to see that in general in 2023 we received far more applications for all of our positions than we did in the year before.

Position	Positions	Applicants	Men	Women
<b>Total</b>	120	2,847	1,631	1,214
<b>Managers</b>	8	140	89	49
<b>Business advisers</b>	8	101	60	41
<b>Business centre advisers</b>	8	125	43	82
<b>Financial advisers</b>	38	941	597	344
<b>Customer advisers</b>	23	658	341	317

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

### Percentage of applicants by age categories

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

Year	< 21	21-25	26-30	31-35	36-40	41-45	46-50	51-55	56-60	61-65	> 65	unknown
<b>2023</b>	14	715	892	436	236	192	144	118	80	13	3	4
<b>2022</b>	4	396	458	370	213	184	87	82	40	8	1	3
<b>2021</b>		450	591	352	169	124	92	84	49	13		13

## 2 Our work on gender equality and against discrimination

### 2.1 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 working actively on diversity and equal opportunities, both in our own business and with respect to customers and suppliers.

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

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

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

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

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

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

### Surveys and analysis

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

### Analysing causes

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

### Initiate measures

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

### Evaluate the results of the work

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

An overview of measures that have been integrated into daily operations, and measures that were implemented in 2023 as a result of an actual situation, as well as risk mapping and analyses in the autumn of 2022, is provided below.

## 2.3 Pay and working conditions

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

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

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

### Measures implemented in 2023

- Some employees have been granted an application for part-time work as a result of care obligations, disabilities, illness or age.
- Analyses of pay and gender by job category, department and region, with the aim of identifying any disparities.
- Analyses of pay and gender were presented to management and employee representatives prior to negotiations.
- Training of all managers prior to pay negotiations. First analyses of pay and gender were presented, and they were then presented with analyses for their own department/region.

SpareBank 1 Østlandet has very few part-time positions, which can be a limiting factor for including people with disabilities. The use of part-time employees is now allowed in a few areas in order to include employees with disabilities. This work will continue in 2024.

## 2.4 Recruitment

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

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

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

Measures implemented in 2023

- 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 2023 show that we did not achieve an adequate gender balance and diversity among applicants for certain job categories. However, we need to acknowledge that in some categories we are affected by the gender-divided labour market. For example, it will not be possible for us to achieve a gender balance among applicants for IT and advanced analysis positions since it remains the case that very few women are training in these professions.

In 2024, we will continue to review text, image use and job advertisements to assess how these appeal to different groups in society. The goal is to ensure increased diversity among applicants.

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

## 2.5 Promotion and development opportunities

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

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

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

Measures implemented in 2023

- In 2023, 28 employees (12 women and 16 men) completed a master's degree course in digital transformation in the financial services industry. In addition, five employees did other master's degree courses.
- In 2023, each employee averaged 72.9 hours of internal and external training, up from 63.4 hours in 2022.
- During the year we saw internal mobility, with 17 women and 17 men changing their positions or work location.
- Eight managers have completed training for new managers in collaboration with SNN.

## 2.6 Inclusion and facilitation

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

We have the following measures as part of daily operations:

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

Measures implemented in 2023

The risk assessment for 2022 revealed a lack of resources/time for systematic work on integration and work training for external parties who find themselves outside the labour market. This was also true for 2023. In 2023, we had:

- One participant from "hurtigspor på Hedmarken" ["fast track in Hedmark"].
- One person on work experience from NAV.
- In 2023, we had a greater focus on inclusion in relation to mental health:
  - Dedicated psychological safety survey, followed up by psychological safety workshops in departmental meetings.
  - Psychological safety and strength-based approach as a topic in management seminars.
  - Webinar on psychological safety and a strength-based approach for all employees.
  - Mental strength training where all employees were offered an opportunity to map their mental health. If indications are identified, a personalised digital training programme with guidance and assistance from a psychologist are offered. If necessary, referrals are also made to more comprehensive treatment.



## 2.7 Opportunities to combine work and family life

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

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

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

Measures implemented in 2023

- Continued scheme for contractual working from home.

## 2.8 Harassment, sexual harassment and gender-based violence

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

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

- All employees participate in an annual 'Ethics Week' where, among other things, the Code of Conduct is reviewed and signed. From 2023, the ethics training will be more continuous with regular 'ethics refreshers' that ensure a focus on various topics throughout the year.
- Annual employee surveys are conducted with separate questions about bullying and harassment.
- We have our own procedures to ensure a low threshold for reporting concerns in the event of witnessing or experiencing harassment.
- We have procedures and a system that ensures the possibility of anonymous notification internally and externally.
- If we discover or uncover harassment internally, further investigations are carried out. If necessary, the occupational health service will also conduct investigations.
- Employees who experience or are accused of harassment are offered support interviews and guidance with an occupational health service or psychologist.
- Employees receive good help if violence is domestic violence is uncovered. They receive immediate access to professional assistance from the occupational health service and/or psychologist.
- Employees who are exposed to threatening customer behaviour are followed up by the security department and are offered support calls and assistance from the occupational health service.
- We conduct exercises on threatening customer behaviour to enable employees to deal with such situations.
- Security guards are employed in offices that are exposed to threatening customer behaviour.
- If necessary, the occupational health service is called in and debriefings and support interviews are carried out.

As far as harassment or gender-based violence (threatening customer behaviour) from customers are concerned, we also implemented the following measures in 2023:

- We conducted a pilot in Oslo/Akershus on demanding customer behaviour.

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

We continued weekly working environment check-ups. Over the course of a year, this provided a better overview of any cases of bullying and harassment than previous employee surveys that were conducted once a year. Three cases were followed up in this area in 2023, and we received external assistance in the form of a specialist psychologist and the institution's occupational health service. One of these cases has been closed.

In 2023, an insights article was written to clarify our procedures and obligations in relation to dealing with bullying and harassment.

## 2.9 Summary of risk assessment

We conducted a risk assessment in January 2023. The key risks are summarised in the table below:

### Risks in the red zone requiring further work.

- Gender-based pay disparities.
- We will continue the work on being attractive to a variety of employees.
- Being unable to include employees with physical disabilities.

### Risks in the yellow zone requiring monitoring

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

The work on risks in the red zone will continue in 2024.

- A new pay analysis looking at pay and gender will be conducted prior to the next pay settlement. Specific pay scales will also be produced for different job categories in connection with recruitment. Reference should also be made here to internal statistics that make it possible for differences in pay to be seen.
- In 2023, we prepared a specific action plan designed to make us attractive to a variety of employees. The action plan includes initiatives within the following priority areas: good working environment, good training, career and development opportunities, competitive pay and conditions, good management, good branding and external and internal communication. For further information, see the annual report. This work will continue in 2024.
- We will continue our mental health efforts in 2024, ref. section 2.6 on inclusion and facilitation.
- In the first quarter of 2024, the multipartite committee will review the ARP report and the risk assessment from 2023.