

Guidelines for ethics and corporate social responsibility

Version 4.0 – updated 18/12/2024

Confidentiality level	Tick appropriate box	Description of confidentiality levels
Public sector	x	Published information or information can be shared without restrictions
Internal		Information intended for internal use, but which would cause little harm to the bank if made available to others.
Restricted		All bank employees have access to information. However, it should only be shared externally based on law or role (police, external auditor, internal auditor, Financial Supervisory Authority of Norway, etc.).
Confidential		Information is only available to a few internal people, e.g., insider information or sensitive decision-making matters. It should only be shared externally based on law or role (police, external auditor, internal auditor, Financial Supervisory Authority of Norway, etc.).

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1 Purpose

These guidelines aim to create security for actions that align with the Sparebanken Møre Group's values and clarify ethical standards for good business practice, responsible business operations, personal behaviour and the bank's social responsibility. The Sparebanken Møre Group consists of the parent bank Sparebanken Møre, the mortgage company Møre Boligkreditt AS, the estate agent company Møre Eiendomsmegling AS and the property company Sparebankeiendom AS, and the guidelines apply to all employees at all levels.

2 Background

The Group seeks the trust of customers, authorities, equity holders, and the society we belong to. We depend on professionalism, competence, and high ethical standards at all levels to achieve and maintain this trust. This applies both to the Group's business operations and everyone's behaviour. All employees and employee representatives must act with care, honesty, and objectivity and refrain from actions that could jeopardise trust in the Group. Managers and employee representatives are particularly responsible and must set a good example for others.

Sparebanken Møre was established in 1985 by merging several local savings banks. The oldest in this merger was Herrøe og Røvde Sparebank, established in 1843. Since the first banks saw the light of day, the social role has been decisive in the various savings banks. This is still the case today. The savings bank model has the strength and the power to contribute to sustainable social development. Sparebanken Møre has also committed to driving this endeavour through the bank's vision of being *the leading contributor to creative enthusiasm in northwestern Norway – every day*. Our corporate social responsibility relates to issues such as climate and the environment, social issues including gender equality and diversity, human rights, labour rights, and the prevention of financial crime, corruption, and governance issues. By sharing our knowledge, committing to society and business, and contributing significantly to society, we will create values that benefit northwestern Norway.

The following formal conditions provide guidelines for the bank regarding established guidelines for ethics and corporate social responsibility:

- 1) The Accounting Act
- 2) The Transparency Act
- 3) The Norwegian Code of Practice for Corporate Governance (NUES)
- 4) Oslo Stock Exchange/Euronext requires reporting on sustainability/social responsibility

3 Ethical considerations

The Sparebanken Møre Group has an open corporate culture. Openness and transparency are prerequisites for motivation, trust and security. All employees must feel confident in raising small and significant issues with their manager or others in the Group, who can guide them on ethics and corporate social responsibility without leading to negative consequences for the individual.

The guidelines cannot always say with certainty what is right and wrong in individual situations. Therefore, when ethical dilemmas arise, taking the necessary time for reflection and systematic thinking is essential. Conversation and dialogue about ethical dilemmas will help create a sound moral foundation in our Group. The ethics navigation wheel is also a good aid when faced with ethical dilemmas. In cases of doubt or “grey areas”, an employee should discuss with a colleague or others in the Group before acting.



4 Responsibility, updates, and decisions

Board of Directors: Responsible for establishing guidelines for ethics and corporate social responsibility in the bank and its subsidiaries. Adopts changes to the guidelines. As part of the Group, the chairs of the companies' boards are responsible for ensuring that employee representatives are familiar with the Code of Ethics and Corporate Social Responsibility and the practice of the Code in their positions of trust.

CEO: Responsible for ensuring that the Code of Conduct for Ethics and Corporate Social Responsibility and work on due diligence are operationalised in the Group.

Risk Management and Compliance Section: This section is responsible for updating the policy. Input and proposals for adjustments to the guidelines must be reported on an ongoing basis to the head of the Sustainability Department. The guidelines are reviewed annually and revised as necessary, at least every three years. The Board decides on changes to the ethics and corporate social responsibility guidelines. The section ensures that the Group's employees are introduced to the guidelines in their day-to-day work, and which obligations they impose on the individual.

Managers: Each employee's knowledge of and compliance with the policy is a managerial responsibility. Managers must be good role models, create an environment of openness about ethical issues, and ensure that relevant laws, rules, procedures, and guidelines are incorporated into the organisation.

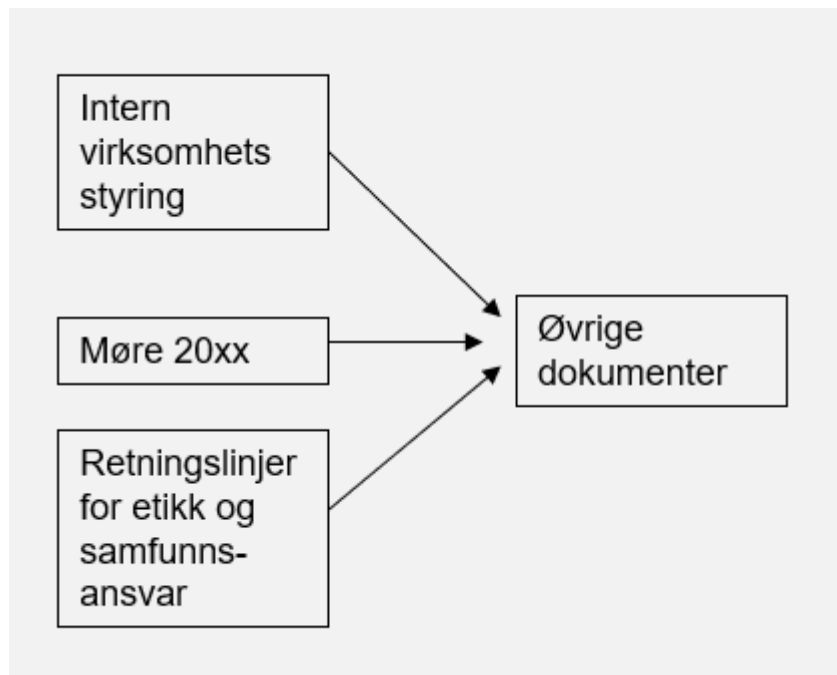
When engaging external resources to perform work for Sparebanken Møre, the manager must ensure that they are informed that these guidelines also apply to them.

Employees and employee representatives: Independent responsibility for familiarising themselves with the guidelines for ethics and corporate social responsibility, as well as other regulations and policies relating to the area they are to deal with. Everyone is responsible for highlighting ethical issues they encounter in their work.

Ethics and corporate social responsibility guidelines are available on the Group's intranet and website, www.sbm.no.

5 Document map

The ethics and corporate social responsibility guidelines are a top-level management document in Sparebanken Møre. The guidelines will not cover all circumstances, and sound and well-considered judgment is essential in each situation. In many areas of the Group, other guidelines and regulations supplement how individual cases should be handled and decided. In addition, everyone must loyally comply with laws, regulations, relevant industry codes of conduct, and internal rules that apply to the Group's operations.



6 CORPORATE SOCIAL RESPONSIBILITY

6.1 Introduction

The Group's social responsibility shall promote sustainable business operations and development. This means making decisions that balance economic, social, and environmental factors. We will help reduce the impact on the climate and the environment, ensure a focus on fundamental human rights and decent working conditions, and safeguard diversity, gender equality, and inclusion in our work on social issues. Furthermore, we shall prevent corruption and other economic crime in our business activities and among suppliers and business partners.

We take social responsibility on three levels:

- In our operations,
- Towards customers and suppliers,
- Within the society we belong to.

In particular, the Group shall contribute to responsible economic, social, and environmental development in the areas and industries in which Sparebanken Møre operates. These guidelines support employees and managers in their strategic decisions and daily work and support the bank's sustainability strategy.

Sparebanken Møre's goal is to be a driving force for sustainable development for customers and the environment. We set precise requirements and expect our suppliers and business associates to work actively with sustainability in their organisations and value chains.

Sparebanken Møre shall conduct risk-based due diligence assessments following applicable regulations and the OECD Guidelines for Multinational Enterprises. As part of the review, the bank shall implement, follow up on, and communicate any measures to stop, prevent, or limit negative consequences.

Sustainability is integrated into Sparebanken Møre's business model and strategic plan Møre 20XX. The bank also has an overarching sustainability strategy that explains how the work is organised, managed, and measured. The bank must prepare an annual report on its work with sustainability, made publicly available as part of its annual report.

6.2 Financial inclusion and good economic health

The Group shall contribute to a sustainable social society in the region in which we are a part. Sparebanken Møre shall promote financial inclusion and good economic health for different socio-economic groups. Social risk and impact shall be considered in developing and pricing products and services, designing our physical premises and digital interfaces, and in our customer counselling.

We will promote financial inclusion by ensuring that everyone has access to essential banking services that are accessible and reasonably priced. Through our product portfolio, we facilitate home purchases, insurance, savings, and investments in phases of life where finances are considered to be challenged. Good financial health means having basic financial skills, control over one's finances, and active use of banking services and products.

Sparebanken Møre has defined groups in society who, for various reasons, need specialised banking services and products, and these form the basis for guidelines and procedures for relevant areas in the bank (in random order):

- Non-digital persons
- Women, including capital gaps between women and men
- Individuals and small/medium-sized enterprises under financial stress
- Refugees/asylum seekers and labour migrants without standard identification
- People with physical or mental challenges
- Entrepreneurs and start-ups

An overview of the products, services and activities offered or performed by Sparebanken Møre in line with our goal of contributing to a sustainable social society can be found in the appendix.

6.3 The environment and climate

The Group shall work purposefully to reduce the environmental impact of its operations, investments, purchasing and property management. The Group will facilitate opportunities for employees and others to contribute to reducing the environmental impact.

We will meet the environmental challenge as follows:

- Efficient resource use and environmentally sound solutions in everyday life. Our environmental accounts visualise this.
- Encouraging employees to be more environmentally aware through various internal measures.
- Offer products and advisory services that stimulate customers to implement various environmental measures.
- The Group must make special assessments when financing businesses (or individuals) where the customer's products or activities may be associated with significant climate risk. Environmental issues shall be assessed in the same way as other forms of risk.
- The Group shall act as a responsible purchaser, and purchases shall, as far as possible, be carried out in a way that helps to reduce environmental and climate impact.

We will be a driving force for customers and suppliers to both think and take environmental considerations into account.

6.4 Working environment, gender equality and human rights

In the Sparebanken Møre Group, we shall promote respect for fundamental human rights and decent working conditions in our value chain. We are conscious of avoiding any breach of the Norwegian Working Environment Act rules. We comply with legislation to ensure diversity and equality and work to ensure that there is no form of direct or indirect discrimination against employees, customers, or others.

The Group is affiliated with the "IA scheme" (Inclusive Workplace in Norwegian). As an IA company, we aim to constantly improve the working environment, prevent and reduce sickness absence, and prevent exclusion and drop-out from the labour market.

As far as possible, all employees, employee representatives, hired consultants, and other contractors must actively contribute to ensuring that customers, suppliers, and business associates, as well as companies in which the Group invests, help to promote respect for fundamental human rights and decent working conditions and safeguard diversity, gender equality, non-discrimination and other social conditions.

6.5 Responsible financing, management, and investment

Sparebanken Møre's procedures shall ensure that the companies we finance demonstrate having established reasonable procedures to fulfil statutory requirements and, through management, words and actions, present themselves in a way that aligns with the general public's perception of good ethical and commercial behaviour.

Sparebanken Møre's risk capacity shall be utilised on customers in Sparebanken Møre's defined market area. Therefore, the bank's funds are not invested in shares or equity funds in Norway or abroad. The exception is shares linked to the financial infrastructure in Norway, where there is joint ownership between the banks and local companies because of market strategic assessments. The limits for equity investments are at a very low level. In our liquidity management, we will focus on sustainability and, through managing the bank's liquidity portfolio, prioritise investments supporting this and contributing to the green shift.

Active management manages funds for the bank's customers with more considerable assets. For investments in and outside Norway/the Nordic region, emphasis will be placed on investing in companies with a business concept and ethical behaviour that does not conflict with the bank's ethical standards. Active management will primarily invest in companies that create long-term value based on a sustainable business model. The companies' management must be willing to implement measures to ensure compliance.

As a distributor of mutual funds, we are responsible for selecting managers who follow sound principles and procedures to ensure accountable investments.

6.6 Tax, corruption, and influence peddling

Sparebanken Møre shall not facilitate tax planning, services, or products where this appears or may be perceived as tax avoidance. Sparebanken Møre will not provide financial services or advise customers who have all or part of their business in countries that do not practice full transparency regarding beneficial owners of bank accounts and other ownership. They do not cooperate with the authorities where the customer is registered as taxable.

The Group shall in no way cooperate with, invest in, or enter into agreements with companies that may be involved in corruption, tax evasion, or other forms of financial crime. The same applies to contact or cooperation with customers and others associated with such activities. The Group has zero tolerance for corruption, bribery, influence peddling, and the use of facilitation payments.

Corruption is defined as demanding, receiving or accepting an offer of an improper advantage for oneself or others in connection with the exercise of a position, office or assignment or giving or offering someone an improper advantage in connection with the exercise of a position, office or assignment.

Bribery means demanding, receiving or accepting an improper gift or advantage, or the promise of this, to perform or refrain from performing an official act.

Influence peddling is defined as demanding, receiving, or accepting an offer of an improper advantage for oneself or others to influence the exercise of another's position, office or assignment.

Such an improper advantage can take the form of financial benefits (money, goods, securities, etc.) or non-financial benefits such as honour and status, promises of future benefits, generous memberships, and the like. The list is not exhaustive.

Facilitation payments are funds provided to speed up a process that does not initially require such payment.

Everyone is responsible for immediately reporting under internal or external whistleblowing procedures if such cases are suspected.

6.7 Money laundering and terrorist financing

Money laundering is the conversion of the proceeds of criminal offences into apparently legitimate income or wealth. The Group is aware of its responsibility to prevent our products and services from being misused for money laundering or terrorist financing.

Each employee has a personal responsibility to be aware of their duties under the money laundering regulations and associated internal guidelines and procedures and to help prevent, detect and report to superiors and the anti-money laundering officer any suspicious transactions that may be linked to the proceeds of criminal offences or may be used to finance terrorist acts.

6.8 Customer and supplier relations

Financial advice must always be based on the customer's needs, financial situation, and risk appetite and in line with the advisers' current certifications. The Group must not exploit its knowledge and economic advantages towards its customers.

We are conscious of integrating sustainability into all business processes and all parts of the value chain. We require our customers to ensure good ethical and responsible business practices. A criterion for any customer relationship is that they comply with relevant legislation and agreements that form the basis of the customer relationship. This also applies to operations in other countries where customers are present. This includes striving for diversity and equality, zero tolerance of racism and other discrimination. We expect customers to consider regulations on using natural resources, activities currently used by local or indigenous populations, or areas with a vulnerable environment, endangered species or water shortages.

We are our suppliers' customers and have the power to influence how suppliers take responsibility for sustainable value creation. As a result, we require our suppliers and business partners to comply with applicable legislation, guidelines, recognised standards and leading practices, and international conventions for sustainability work. This means, among other things, that we expect our suppliers and other business partners to help promote respect for the climate and the environment, fundamental human rights and decent working conditions, safeguard diversity, gender equality, non-discrimination and other social conditions, and prevent corruption and other economic crime in their operations and the supply chain. Specific requirements for our suppliers follow the requirements included in the "Guidelines for sustainability in the supply chain".

6.9 Local communities, social impact, and political engagement

Sparebanken Møre wants to significantly contribute to the local community through the bank's activities. With local roots, proximity and knowledge of customers, personal follow-up, service and the ability to make quick decisions, the bank will help maintain healthy market competition and provide a reasonable offer to customers.

We impose requirements on receivers of funds from the social dividend and receivers of sponsorship funds for teams and organisations regarding their ability to demonstrate responsible operations and compliance with laws and agreements. Sustainability is included in all partnership agreements as a separate section, and requirements are set for sound financial management and ethical assessments (G), inclusion and equality (S) and specific expectations relating to climate and the environment (E).

We also expect receivers of funding from the bank to have established good ethical attitudes with respect for basic norms for corporate social responsibility within their areas of activity.

Sparebanken Møre shall play an active role in the local communities where the bank is represented. The Group's relationship with the local community and the region shall be characterised by a clear commitment to developing northwestern Norway into a good place to live and work. Sparebanken Møre will also give back to the local community through the annually distributed funds as the bank's social dividend.

Sparebanken Møre will not make direct, biased political donations or cover expenses for lobbying activities. Support for thorough investigations, etc., before political decisions affecting the region we are a part of may receive support because it helps to shed light on objective conditions that form the basis for the case's conclusion.

At the same time, we recognise that lending to businesses and private individuals can be used indirectly for political activity without revealing this in the loan process and will therefore be beyond our control.

Sparebanken Møre is politically neutral and impartial in its activities. However, we recognise that employees may wish to engage in political activity. The "Guidelines for identifying and managing conflicts of interest" address guidelines for employees' political involvement.

7 OUR PERSONAL BEHAVIOUR

7.1 Communication

We must be responsive, proactive and helpful to our customers and business partners. This applies to all communication channels. Good banking practices, business practices, and ethical attitudes form the basis for communication and advice, ensuring that customers and the Group's other business partners are looked after in the best possible way.

Relations with the press and social media

To ensure that statements to the press are correct based on an overall assessment of other circumstances, enquiries from the press are always made in collaboration with the Organisation and Group Support unit of the Communication and Community Engagement department. Employees with defined spokesperson roles may have contact with the press following the established policy.

As an employee, it is positive if you are an active ambassador on social media, but you must be conscious of what you share and your role in the bank. The distinction between professional and private social media use is often unclear to your surroundings, who may associate you with your employer, even if you post on your private social media profile. Do not share content that violates the Group's guidelines and the formal requirements that regulate the Group's activities.

Respect for colleagues

In the Group, we create a good and stimulating collegial community together. We are supporters and contribute to each other's professional and personal development through open and honest communication. We show each other respect, which is essential to make everyone feel valued for who they are. This will provide security and create trust – prerequisites for performing to the best of our ability for the Group, our customers and the community around us. Bullying, other forms of harassment, and direct or indirect discrimination shall not occur. Situations perceived as a breach of the above will follow separate notification procedures.

7.2 Confidentiality and privacy

We have a duty of confidentiality regarding what we learn about the Group, customers, and suppliers. This duty applies to outsiders and colleagues who do not need the information in question for their work and also applies after ceasing employment with the Group. We refrain from actively seeking information about colleagues, customers, or outsiders via the Group's systems when it is not necessary to perform our work.

Personal data must be handled with care in line with GDPR. More detailed rules can be found in legislation and the Group's internal procedure for processing personal data. We pay particular attention to what personal data and to whom it may be disclosed, even when there is a statutory disclosure obligation. If there is any doubt about understanding these regulations, one of the bank's lawyers or the Group's data protection officer should be contacted.

7.3 Gifts and benefits

We will refrain from accepting a gift or favour if it could affect our integrity and independence. We must also refrain from giving or offering such an advantage to others. Applicable laws and

regulations on accounting and reporting of taxable benefits are to be followed. The employee handbook provides more information and guidelines.

7.4 Representation and events

When we represent the Group or are identified with it, we must do so in a way that builds trust in both the Group and us. Our core values – committed, close, and vigorous – are exercised and made visible through behaviour and actions that comply with the Group's guidelines for ethics and corporate social responsibility.

The employer shall cover travel and accommodation when performing work for the Group. Employees invited to professional events by suppliers or other business partners for training must clarify with their manager what can be covered by the inviting party to avoid conflicts of interest.

7.5 Conflicts of interest and impartiality

Employees and employee representatives must avoid situations, both professionally and privately, where our independence, integrity, or loyalty could be questioned. We must not deal with, decide, or exert influence when we or our close associates, directly or indirectly, have financial or other personal interests. A general rule is that the subordinate may not decide the matter if a superior is disqualified.

Employees with insight into customer commitments cannot invest in these companies (this applies to unlisted and listed companies). If a situation of disqualification should occur or questions of impartiality need to be further clarified, the immediate superior must be notified without delay. The superior can obtain a statement from one of the bank's lawyers if necessary.

The "Guidelines for identifying and managing conflicts of interest" provide more information and a more detailed definition.

7.6 Organisational freedom

The right to organise is a fundamental human right. Article 8 of the UN International Covenant on Economic, Social and Cultural Rights states that everyone has the right to form trade unions and join a trade union of their choice.

Employees of Sparebanken Møre are free to join a trade union, choose which trade union to be a member of, or to remain outside any trade union. Direct and indirect discrimination based on employee organisation membership is not accepted at Sparebanken Møre, in line with section 13-1 of the Working Environment Act.

7.7 Other professional activities, positions of trust in commercial enterprises, etc.

It is assumed that the work in the Group is the individual full-time employee's primary gainful employment. Full-time or part-time employees must have written acceptance from their employer to have gainful employment outside the Group. Applications are submitted to the HR department via the employee's superior. This also applies to board positions in all commercial enterprises regardless of whether remuneration for the position is received.

Employees' external positions must be registered in the bank's HR portal, and section 5.3.6 of the "Guidelines for identifying and managing conflicts of interest" is referenced here.

7.8 Positions in voluntary organisations and associations

It is considered positive that the Group's employees get involved in their local community in their spare time and take voluntary positions in organisations and associations. If there is any doubt as to whether the involvement may conflict with work at the bank, this must be discussed with the immediate manager before taking up the position.

Employees' external positions must be registered in the bank's HR portal, and section 5.3.6 of the "Guidelines for identifying and managing conflicts of interest" is referenced here.

7.9 Close associates

Generally, siblings, parents/children, or spouses/cohabitants must not work under the same manager or department. They may not hold positions or positions of trust that could approve, assess, prevent, audit, or otherwise influence the other person's work.

The employment of persons with a close relationship with managers in the Group must be given special consideration at a decision-making level above the manager in question. Employees who enter cohabitation or marriage/partnership with each other must, together with the employer, find acceptable work arrangements based on the considerations behind the rules on "close associates".

7.10 Orderliness in one's own finances

The Group's employees and representatives must ensure their financial obligations are in order. It may be perceived as a weakening of trust, respect and independence if someone is exposed to economic pressure that is difficult to manage over time or in size. Employees who cannot meet their financial obligations over a certain period and are in danger of losing control of their finances must inform their immediate manager.

Employees or employee representatives may not set up or participate in illegal gambling, pyramid schemes or other schemes that can be assumed to weaken confidence in the individual or affect the Group's ethical values and norms for social responsibility.

7.11 Self-service

We must not engage in self-service as employees. Self-service means that employees, on their behalf or behalf of related parties, execute orders or transactions, make changes to terms and conditions, or enter into agreements. This also applies to companies or other organisations where the employee or close associate is a manager, board member, or holds another position.

Unless otherwise stipulated, employees are entitled to self-service to the same extent and on the same terms as ordinary customers.

7.12 Purchase of assets from estate administration or debt collection activities

Employees, employee representatives, or their close associates are not permitted to remove or purchase objects or rights in connection with customers of the Group, which is subject to bankruptcy proceedings, debt collection proceedings, forced sales, or debt negotiations. However, this does not apply if mortgaged objects or the bank's assets are sold following a public announcement/advertisement in a completely open market, by forced sale or via a bankruptcy estate.

7.13 Trading in financial instruments and inside information

Inside information is information that can affect the price of securities and is not publicly available or widely known in the market. Employees or employee representatives must not use or contribute to others using inside information about the Group or other companies as a basis for trading in securities. This applies both privately and on behalf of the Group. More information and a more detailed definition of inside information can be found in “Guidelines for handling inside information”.

The “Guidelines for primary insiders” also apply to primary insiders in Sparebanken Møre and Møre Boligkreditt AS. The “Guidelines for the investment firm” also apply to employees working with services requiring a licence as defined in the Securities Trading Act.

8 Breaches and whistleblowing

It is crucial for the Group and the society we serve that we report if we become aware of matters that we believe violate laws and guidelines that apply to the Group's operations or other relevant legislation. Responsible whistleblowing about such issues should not have negative consequences for the individual. Separate whistleblowing routines can be found in the security manual and “Routine for internal whistleblowing at Sparebanken Møre”.

If external stakeholders experience breaches or possible breaches of our Code of Conduct or other relevant laws and guidelines, they can contact us via the complaints function on our website, sbm.no.

Apparent breaches of the Code of Conduct and Corporate Social Responsibility may result in labour law consequences for the individual employee, depending on the case and severity. Further information on this can be found in the employee handbook. For employee representatives, violations may result in the sanctions that the head of the organisation or the organisation in question has at its disposal or, based on a specific assessment, finds it appropriate to implement.

Audit trail

Version	Date of approval	Approved by	Updated sections
4.0	18.12.2024	Sparebanken Møre's Board of Directors	<p>Changes</p> <p>3 – added grey areas and ethics wheel</p> <p>5 – document map, clarified the level of the guidelines</p> <p>6 – changed name superior</p> <p>6.1 – changed title and clarified link to the strategic plan</p> <p>6.9 – clarified content related to sustainability agreements</p> <p>7.5 new section on prohibition of investment in companies</p> <p>Otherwise, there are minor linguistic adjustments.</p>
3.0	13.12.2023	Sparebanken Møre's Board of Directors	<p>Major changes</p> <p>5.2 – new in its entirety</p> <p>5.6 – updated with trading in influence</p> <p>5.8 – added on due diligence and follow-up of suppliers</p> <p>5.9 – added on political engagement</p> <p>6.6 – new in its entirety</p> <p>7 – clarified external whistleblowing</p> <p>6.6 – new in its entirety</p> <p>7 – clarified external whistleblowing</p>
2.0	23.03.2021	Sparebanken Møre's Board of Directors	Minor adjustments related to the organisation
1.0	24.01.2018	Sparebanken Møre's Board of Directors	

Appendix to ethics and social responsibility

Financial inclusion and economic health of customer groups in Sparebanken Møre

Sparebanken Møre is the largest bank in northwestern Norway, giving us many opportunities and a great responsibility. We have the power to help people here create a home and a future with healthy finances, and we want to be a bank for everyone. From the outset, the purpose of the savings banks has been to be a player that helps and benefits people and businesses and contributes to growth and development in local communities. Sparebanken Møre continually assesses whether our customer service and product portfolio promote financial inclusion and financial health. Sparebanken Møre has a wide range of products that can be adapted to each customer through customisation based on individual needs. Furthermore, we describe measures and arrangements in our customer care and product portfolio that will contribute to financial inclusion and good financial health.

Table 1: A summary of Sparebanken Møre's schemes for financial inclusion and financial health.

Theme	Description	Product/action
Digital social exclusion	Anyone who feels limited in their ability to utilise all or part of digital solutions	Local offices throughout the county Personal advisor Postal giro, account phone and contact withdrawals/deposits Information pamphlet on sbm.no and paper
Refugees/asylum seekers and migrant workers	Bank customers who have recently arrived in Norway and need banking services	Approved alternatives to identification Possibility of an interpreter/extra person present during counselling Customer declaration form in Norwegian and English
Capital gaps	Nationally and globally, women are less financially independent and invest and save less than men	Personal counselling Open theme meetings
Physical barriers	Those who, due to physical limitations, do not have full access to ordinary banking services/products	Wheelchair-accessible premises Universal design of digital surfaces Braille bank cards for the visually impaired (to be launched in 2023)
Old age/serious physical or mental illness/disability	When old age, illness or other events make it challenging to maintain personal finances and banking services or the source of income changes	Asset manager Future power of attorney Guidance for relatives Pension savings and counselling Disability benefits and other fixed benefits are equated with fixed income from work when calculating loan servicing capacity
Children, teenagers and young adults	Banking services and counselling for under-18s and parents, as well as young adults in need of customised pricing of products	Personal finance education in schools Age-appropriate banking services "Småspar" (Small savings) "Ung forsikring" (Young insurance) "Boliglån Ung" (Young Mortgage) First home loan

Loss of financial control	Circumstances causing lost control of own finances	Personal advisor The "Grep" department The Special Commitments department
General training and counselling	Offer skills upgrading for the bank's customers and others who want information. The goal is good financial health for the population	Customised personal advice Helpful (!) news articles about healthy finances and relevant banking topics. Open theme meetings, information about banking and finance, savings and investments, etc. Customised advice from an advisor E-mails to customers with tips and advice, as well as online and mobile banking pop-ups, customised to the customer's engagement.
Entrepreneurs/small businesses	Founders and small start-ups can be financially vulnerable in the start-up phase	Growth guarantee scheme Start-up package for businesses Business base with specialised advisors for SMEs "Næringsteft" (Business flair)

Financial inclusion

Non-digital people

Society is changing, and many services, including banking, have been digitised. Sparebanken Møre offers cashless and mobile banking services. However, there are still many people who, for various reasons, still need non-digital banking services. Sparebanken Møre also offers these customers banking services and has solutions for letter giro, telebanking, cash withdrawals and deposits in grocery stores, as well as bank statements and other information sent by post. We have local offices throughout our county and in Oslo, so visiting the bank and getting personal help and guidance from one of our advisers should be easy.

Refugees/asylum seekers and labour immigrants

As part of the financial services industry in Norway, Sparebanken Møre must facilitate financial inclusion for refugees who come to Norway. This means offering essential banking services, even when refugees do not have a passport or national ID card. The Financial Supervisory Authority of Norway's "Guide to the Money Laundering Act" opens for refugees to become customers of Norwegian banks without conventional identification. Sparebanken Møre recognises asylum seeker certificates as proof of identity and requests additional documentation to substantiate identity, e.g. confirmation of benefits from the municipality, etc. The bank also recognises residence cards as proof of identity combined with other identification. Sparebanken Møre must also comply with the Money Laundering Act, and the necessary checks must be made on the individual's identity through individual assessments.

Language often hinders this group's access to essential banking services. Sparebanken Møre offers digital and analogue customer declaration forms in Norwegian and English. Customers receive answers in the language in which the form is submitted. Customers are welcome to bring an interpreter or support person from, e.g., the municipality to their meeting with the bank.

People with physical challenges

Sparebanken Møre endeavours to achieve universal design of its digital interfaces for the public, both online and on mobile devices. Universal design means that users can utilise the digital offering regardless of circumstances. We use a tool that continuously assesses the degree of universal design on our websites and identifies areas for improvement. The improvements are put on a list of

measures where Sparebanken Møre cooperates with third parties to provide technical solutions to constantly improve the universal design of digital interfaces.

Sparebanken Møre's bank branches are wheelchair accessible for easy access to physical banking services.

When bank cards are relaunched in 2023, they will have Braille so that visually impaired people can more easily distinguish between debit and credit cards.

Old age/serious mental or physical illness/accident

Customers who want help with day-to-day banking services can appoint an authorised manager for their bank accounts. The manager can make digital payments and transfers on behalf of the customer.

Sparebanken Møre's customers can set up a future power of attorney. This allows customers to decide who will look after their interests when they can no longer do so themselves. The future power of attorney must be set up while the customer is still mentally healthy. Sparebanken Møre offers the opportunity to select a future power of attorney at a favourable price in collaboration with a legally qualified third party.

If a person's mental health is impaired, it may be appropriate to appoint a guardian. The bank does not appoint guardians, but the county governor in the customer's county does. The guardian is accountable to the county governor to ensure that the customer's money is looked after correctly. Questions about applying for guardianship should be directed to the county governor in the customer's county.

Sparebanken Møre offers its customers pension counselling and various offers for their pension savings, pensions saved via an employer, and pensions from the National Insurance Scheme. In Sparebanken Møre, income from benefits such as disability pensions will be assessed as fixed income, like income from permanent employment. When applying for a loan, the debt service ratio will be calculated similarly, and the same access to banking services will be provided.

Children, teenagers and young adults

Through its collaboration with "Ungt Entreprenørskap" (Young Entrepreneurship), Sparebanken Møre supervises two personal finance programmes in schools. Education in personal finance is a fundamental prerequisite for making independent and good choices as an adult. Through the programmes "Economy & Career Choices" in secondary school and "ØkonoMIN" in upper secondary school, pupils learn how their choices affect their finances.

Sparebanken Møre offers age-appropriate products to children and young people so that they can gradually approach banking services and gain an overview of personal finances.

Students and young adults often need customised guidance and product pricing in the early stages of adulthood. Sparebanken Møre offers this group customised insurance, loan, and savings products, such as the Young Insurance concept, favourable car insurance, first home loans, and Young Mortgage.

Financial health

People under financial stress

Sparebanken Møre follows its customers closely with personalised advice and follow-up. The "Grep" concept is offered to customers experiencing financial challenges and showing signs of losing control. We also have a Special Commitments department established in Sparebanken Møre to assist advisers with demanding commitments in the retail and business markets.

The "Grep" department

People under financial stress include those experiencing economic challenges and increasingly losing control over their finances. Macroeconomic conditions such as inflation, increased

unemployment and general price increases can significantly affect individuals' finances and increase the risk of financial challenges. Consumer loans can be used as a short-term solution to maintain lifestyles despite macroeconomic changes, and together, consumer debt and changing macroeconomic conditions can escalate to loss of control. Control of total debt via the Norwegian Debt Register limits the possibility of borrowing beyond one's means, but even so, financial conditions can collectively lead to financial stress.

For this reason, Sparebanken Møre has strengthened its level of preparedness and established the "Grep" department for customers with financial challenges. In doing so, they are treated with a greater degree of quality and equality while at the same time ensuring that the Bank is prepared for an increase in such commitments in the event of changed macroeconomic conditions. The customer group is followed up by a specialist adviser from the "Grep" department, where thorough identification of needs, advice, documentation and, not least, extra close follow-up is a key working method. Each customer receives an individual action plan drawn up together with the adviser to regain a sustainable and healthy economy.

Special commitments

The Special Commitments department is responsible for the internal follow-up of particularly risky commitments (including debt collection) in the retail market portfolio, including "Grep". Special Commitments assists advisors and bank managers with particularly challenging obligations to find the best possible solution for the customer and the bank, in consultation with public agencies or other partners if necessary. The bank is responsible for customers who cannot achieve sustainable finances through measures such as refinancing so that they are also presented with solutions such as realisation or public debt counselling. Special Commitments also contributes to the skills development of internal advisers to support the work with customers experiencing increasing financial stress.

General advice and expertise development

Being close is one of Sparebanken Møre's core values. We are close to our customers and the local community through many local branches and by being easily accessible through other channels. We want our surroundings to perceive us as open, fearless, quality-conscious, genuinely friendly, caring about and considering our customers and the local community. Our advisers know their customers well and can offer customised advice and a familiar face to relate to as their needs change. The bank's customers are offered information and newsletters customised to their involvement with the bank. They can receive information by post, e-mail and in the news tab on their online or mobile banking service. The bank also has a landing page called Nyttig! (useful) via sbm.no, where in-depth information on current topics is shared on social media, by e-mail, and as news items on appropriate pages on sbm.no. Sparebanken Møre organises theme meetings several times yearly to provide information about various banking services/products. Examples of topics include pensions, future power of attorney, mortgages for young people, etc. The theme meetings are open to everyone, including those who are not bank customers.

Entrepreneurs/small businesses

Entrepreneurs and small businesses can be in a vulnerable financial situation in the start-up or growth phase. Sparebanken Møre wants to contribute to strong, attractive and vibrant local communities in northwestern Norway, and support for business development is an essential factor in this respect. Most of Sparebanken Møre's business portfolio consists of small and medium-sized enterprises. Sparebanken Møre is part of Innovation Norway's Growth Guarantee Scheme. The Growth Guarantee Scheme secures earmarked funds for early-stage growth companies in northwestern Norway. On the bank's website, there is a separate page for people who want to start a business, where they can obtain information on how to register their company, a start-up package for

essential services and information on several aspects that need to be considered when starting a business, such as a good business plan, budget and possible support schemes that can be used. Sparebanken Møre has a Business Centre with specialised advisors who guide business customers through the establishment, start-up phase and ongoing company development.

We also have “Næringsteft”, a combined skills development journey and competition organised by Sparebanken Møre for early-stage companies/enterprises. Entrepreneurs can access mentors from academia, public funding agencies, established businesses, and investors. The winner of the competition receives funding, but through the programme, all participants gain increased expertise and a network that can help the company accelerate its development.