

GRI 2022 – General disclosures

GRI	Indicator	Description	Source
Organisation and reporting practice			
2-1	Organisation name, ownership and legal form, location of head office, country in which the business operates.	a. Sparebanken Sør c. Kristiansand d. Norway	b. Annual report 2022, page 100 Annual report 2022, Note 35
2-2	List all its entities included in the organisation's sustainability reporting. a. list all its entities included in its sustainability reporting; b. if the organisation has audited consolidated financial statements or financial information filed on public record, specify the differences between the list of entities included in its financial reporting and the list included in its sustainability reporting; c. if the organisation consists of multiple entities, explain the approach used for consolidating the information, including: i. whether the approach involves adjustments to information for minority interests; ii. how the approach takes into account mergers, acquisitions, and disposal of entities or parts of entities; iii. whether and how the approach differs across the disclosures in this Standard and across material topics.	a. The Sustainability Report includes Sparebanken Sør (the parent bank) and all subsidiaries (excluding Sørmelegren Holding AS and Sørlandets Forsikringscenter AS) where the bank alone or together with subsidiaries has a controlling influence, normally as a result of an ownership interest of more than 50 per cent. b. The consolidated financial statements include the parent bank and subsidiaries (including Sørmelegren Holding AS and Sørlandets Forsikringscenter AS) where the bank alone or together with subsidiaries has determining influence, normally as a result of an ownership interest of more than 50 per cent. c. The consolidated financial statements include the parent bank and subsidiaries, where the bank alone or together with subsidiaries has determining influence, normally as a result of an ownership interest of more than 50 per cent. The Sustainability Report includes the parent bank and subsidiaries, but Sørmelegren Holding AS and Sørlandets Forsikringscenter AS are only included in the climate accounts. i. No adjustments to minority interests. ii. No mergers or acquisitions in 2022. iii. No differences.	Annual Report 2022, Note 26
2-3	Reporting period, frequency and contact point for questions regarding the report or its content. a. specify the reporting period for, and the frequency of, its sustainability reporting; b. specify the reporting period for its financial reporting and, if it does not align with the period for its sustainability reporting, explain the reason for this; c. report the publication date of the report or reported information; d. specify the contact point for questions about the report or reported information.	a. 01.01.2022–31.12.2022, annually b. 01.01.2022–31.12.2022, annually, plus quarterly financial reporting c. 30.03.2023 d. Magne Kvaslerud (magne.kvaslerud@sor.no)	
2-4	Report restatements of previous information from previous reports and the reason for the changes. a. report restatements of information made from previous reporting periods and explain: i. the reason for the restatements ii. the effect of the restatements	a. No restatements from previous reports.	
2-5	Practice for external for external verification of the report. a. describe its policy and practice for seeking external assurance, including whether and how the highest governance body and senior executives are involved; b. if the organisation's sustainability reporting has been externally assured: i. provide a link or reference to the external assurance report(s) or assurance statement(s); ii. describe what has been assured and on what basis, including the assurance standards used, the level of assurance obtained, and any limitations of the assurance process; iii. describe the relationship between the organisation and the assurance provider.	a. The Sustainability Report is certified by an auditor. The report is considered and approved together with the annual report by the Board of Directors and the Board of Trustees. b. Certified by an external auditor. ii. Appears in audit report, audit standard ISA E3000. iii. PWC is Sparebanken Sør's auditor.	b. i. and b. ii. Link to auditor's report .
Activities and workers			
2-6	Activities, value chain and other business relationships. a. report the sector(s) in which it is active; b. describe its value chain, including: i. the organisation's activities, products, services, and markets served; ii. the organisation's supply chain; iii. the entities downstream from the organisation and their activities; c. report other relevant business relationships; d. describe significant changes in 2-6-a, 2-6-b, and 2-6-c compared to previous reporting periods.	a) Banking and Finance b. ii. Suppliers are mainly Norwegian suppliers, many of which are local and include IT, consultants, office supplies and deliveries in connection with the bank's office buildings. Annual procurements amount to approx. NOK 515 mill. b. iii. The downstream value chain consists mainly of retail and corporate customers in the business areas deposits, lending and other financial products and services. c. The most important business connections are related to IT services and product providers of financial products and services. d) There are no significant changes compared to previous reporting periods.	b. Sustainability Report, Chapter 1 b. i. Annual Report 2022 pages 9 and 10
2-7	Number of employees distributed by gender, region and employment type. a. the total number of employees, and a breakdown of this total by gender and by region; b. report the total number of: i. permanent employees, and a breakdown by gender and by region; ii. temporary employees, and a breakdown by gender and by region; iii. non-guaranteed hours employees, and a breakdown by gender and by region; iv. full-time employees, and a breakdown by gender and by region; v. part-time employees, and a breakdown by gender and by region; c. describe the methodologies and assumptions used to compile the data, including whether the numbers are reported: i. in head count, full-time equivalent (FTE), or using another methodology; ii. at the end of the reporting period, as an average across the reporting period, or using another methodology; d. report contextual information necessary to understand the data reported under a and b; e. describe significant fluctuations in the number of employees during the reporting period.	All the bank's offices are located in a relatively small geographical area in Norway, and are for reasons of size and geographical location defined as one region. b. iii. 0 c. Data is collected from the bank's payroll system, Sinsployer, and figures are based on data as at 31.12 i. FTEs ii. As at 31.12, i.e. at the end of the reporting period d. The figures are based on permanent employees, i.e. excluding part-time employees and temporary workers. All figures are based on figures as at 31.12. e. There were no significant changes in the number of employees during or between reporting periods.	a., b., b. i., b. ii., b. iv., v. Scorecard section 1.1
2-8	Workers who are not employees. a. report the total number of workers who are not employees and whose work is controlled by the organisation and describe: i. the most common types of worker and their contractual relationship with the organisation; ii. the type of work they perform; b. describe the methodologies and assumptions used to compile the data, including whether the number of workers who are not employees is reported: i. in head count, full-time equivalent (FTE), or using another methodology; ii. at the end of the reporting period, as an average across the reporting period, or using another methodology; c. describe significant fluctuations in the number of workers who are not employees during the reporting period and between reporting periods.	a. 0 Sparebanken Sør has no workers who are not employees according to the GRI definition.	
Governance			
2-9	The organisation's governance structure, including committees of the highest governance body which are responsible for financial, environmental and social issues. a. describe its governance structure, including committees of the highest governance body;	a. The bank has the following steering committees: Audit Committee, Risk Committee (incl. ESG), Remuneration Committee, Technology Committee b. The Risk Committee and the Audit Committee are responsible for preparing ESG matters for the Board of Directors. c. iii. The maximum period of functioning on the Board in accordance with	a. Annual report 2022, page 100 c. https://www.sor.no/felles/om-sparebanken-sor/styre-ledelse-og-organisasjon/ i. https://www.sor.no/felles/om-

	<p>b. list the committees of the highest governance body that are responsible for decision-making and overseeing the management of the organisation's impacts on the economy, environment, and people;</p> <p>c. describe the composition of the highest governance body and its committees by:</p> <ol style="list-style-type: none"> executive and non-executive members; independence; tenure of members on the governance body; number of other significant positions and commitments held by each member, and the nature of the commitments; gender; under-represented social groups; competencies relevant to the impacts of the organisation; stakeholder representation. 	<p>the Articles of Association is eight years</p> <p>c. vi. Not relevant for 2022</p> <p>c. viii. There are two employee representatives on the Board.</p>	<p>sparebanken-sor/styre-ledelse-og-organisasjon/styret/ ii. Annual report 2022, page 100 iv. https://www.sor.no/felles/om-sparebanken-sor/styre-ledelse-og-organisasjon/mer-om-styret/ v. Scorecard, Section 1.1 vii. https://www.sor.no/felles/om-sparebanken-sor/styre-ledelse-og-organisasjon/mer-om-styret/</p>
2-10	<p>Nomination and selection of the highest governance body</p> <p>a. describe the nomination and selection processes for the highest governance body and its committees;</p> <p>b. describe the criteria used for nominating and selecting highest governance body members, including whether and how the following are taken into consideration:</p> <ol style="list-style-type: none"> views of stakeholders (including shareholders); diversity; independence; competencies relevant to the impacts of the organisation. 	<p>b. iv. When assessing the Board's competence, emphasis is placed on the Board having overall complementary expertise that covers all key aspects of the Group's activities and geography.</p>	<p>a., b., b. i., https://www.sor.no/globalassets/organisasjon/barekraft/vedtekter-sparebanken-sor.pdf b. ii. https://www.sor.no/globalassets/organisasjon/barekraft/board-diversity-policy-sparebanken-sor.pdf b. iii. Annual report 2022, page 100</p>
2-11	<p>Chair of the highest governance body</p> <p>a. report whether the chair of the highest governance body is also a senior executive in the organisation;</p> <p>b. if the chair is also a senior executive, explain their function within the organisation's management, the reasons for this arrangement, and how conflicts of interest are prevented and mitigated.</p>	<p>a. The Chair of the highest governance body (Chair Knut Sætre) is not the same person as the CEO (Geir Bergskaug)</p> <p>b. Not relevant</p>	<p>a. https://www.sor.no/felles/om-sparebanken-sor/styre-ledelse-og-organisasjon/</p>
2-12	<p>Role of the highest governance body in overseeing the management of impacts.</p> <p>a. describe the role of the highest governance body and of senior executives in developing, approving, and updating the organisation's purpose, value or mission statements, strategies, policies, and goals related to sustainable development;</p> <p>b. describe the role of the highest governance body in overseeing the organisation's due diligence and other processes to identify and manage the organisation's impacts on the economy, environment, and people, including:</p> <ol style="list-style-type: none"> whether and how the highest governance body engages with stakeholders to support these processes; how the highest governance body considers the outcomes of these processes; describe the role of the highest governance body in reviewing the effectiveness of the organisation's processes as described in b, and report the frequency of this review. 	<p>a. The Board and Group Management are responsible for Sparebanken Sør's governing documents and goals, as well as for operationalising and supervising the bank's sustainability strategies.</p> <p>b. The Board and Group Management are responsible for identifying and managing the Group's impact on ESG areas, including engagement with stakeholders.</p> <p>i. The Board considers and approves stakeholder mapping and material topics. In addition, the Board and Group Management have dialogue with multiple stakeholder groups, but there are no fixed agendas or meeting places.</p> <p>ii. Mapping stakeholders' views is important in connection with the choice of material topics.</p> <p>c. Status and development are followed up through various Board matters as well as quarterly risk reports, the annual Sustainability Report, as well as an annual audit of governing documents.</p>	<p>a., b. https://www.sor.no/globalassets/organisasjon/barekraft/sustainability-strategy-sparebanken-sor.pdf, Section 3, page 6</p>
2-13	<p>Delegation of responsibility for managing impacts.</p> <p>a. describe how the highest governance body delegates responsibility for managing the organisation's impacts on the economy, environment, and people, including:</p> <ol style="list-style-type: none"> whether it has appointed any senior executives with responsibility for the management of impacts; whether it has delegated responsibility for the management of impacts to other employees; <p>b. describe the process and frequency for senior executives or other employees to report back to the highest governance body on the management of the organisation's impacts on the economy, environment, and people.</p>	<p>i. Rolf Søraker, EVP of Corporate Staff, is responsible for the ESG area in Sparebanken Sør</p> <p>ii. Responsibility for managing the influence of relevant material topics is delegated to the EVPs.</p> <p>b. Quarterly Risk Reports, Compliance Reports and Anti-Money Laundering Reports, as well as the annual Sustainability Report.</p>	<p>a. https://www.sor.no/globalassets/organisasjon/barekraft/sustainability-strategy-sparebanken-sor.pdf, page 6</p>
2-14	<p>Role of the highest governance body in sustainability reporting.</p> <p>a. report whether the highest governance body is responsible for reviewing and approving the reported information, including the organisation's material topics, and if so, describe the process for reviewing and approving the information;</p> <p>b. if the highest governance body is not responsible for reviewing and approving the reported information, including the organisation's material topics, explain the reason for this.</p>	<p>a. The Board is responsible for approving the Risk Report and Sustainability Report, including material topics. The process is as follows: the CEO makes recommendations to the Risk Committee, which provides a recommendation to the Board as approver.</p> <p>b. not applicable</p>	
2-15	<p>Conflict of interests.</p> <p>a. describe the processes for the highest governance body to ensure that conflicts of interest are prevented and mitigated;</p> <p>b. report whether conflicts of interest are disclosed to stakeholders, including, at a minimum, conflicts of interest relating to: cross-board membership;</p> <ol style="list-style-type: none"> cross-shareholding with suppliers and other stakeholders; existence of controlling shareholders; related parties, their relationships, transactions, and outstanding balances. 	<p>Conflicts of interest are handled by the Corporate Staff Division via HR. HR's goal is to detect and map conflicts of interest, as well as manage these and where applicable implement measures to eliminate, reduce or minimise conflicts of interest.</p> <p>b. i., ii., iii., iv. HR is responsible for following up conflicts of interest and considering how these should be reported and handled on a case-by-case basis. For reasons of confidentiality, any involvement and reporting must be assessed on an ongoing basis. There were two cases of conflicts of interest in 2022, which were minor and which were resolved.</p>	<p>a. https://www.sor.no/globalassets/organisasjon/barekraft/conflict-of-interest-document-sparebanken-sor.pdf</p>
2-16	<p>Communication of critical concerns.</p> <p>a. describe whether and how critical concerns are communicated to the highest governance body;</p> <p>b. report the total number and the nature of critical concerns that were communicated to the highest governance body during the reporting period.</p>	<p>a. Critical concerns in the form of complaints and external and internal notifications are reported to the Board in the quarterly Risk Report.</p> <p>b. There were no reports of concerns of a critical nature.</p>	<p>a. https://www.sor.no/globalassets/organisasjon/barekraft/customer-complaints-procedure-sparebanken-sor.pdf https://www.sor.no/globalassets/organisasjon/barekraft/external-whistleblowing-procedure-sparebanken-sor.pdf https://www.sor.no/globalassets/organisasjon/barekraft/internal-whistleblowing-procedure-sparebanken-sor.pdf</p>
2-17	<p>Collective knowledge of the highest governance body.</p> <p>a. report measures taken to advance the collective knowledge, skills, and experience of the highest governance body on sustainable development.</p>	<p>a. Review of various sustainability topics, policy documents etc. in Board meetings. Board meetings with sustainability topics on the agenda.</p>	
2-18	<p>Evaluation of the performance of the highest governance body.</p> <p>a. describe the processes for evaluating the performance of the highest governance body in overseeing the management of the organisation's impacts on the economy, environment, and people;</p> <p>b. report whether the evaluations are independent or not, and the frequency of the evaluations;</p> <p>c. describe actions taken in response to the evaluations, including changes to the composition of the highest governance body and organisational practices.</p>	<p>a. The Board has an annual self-evaluation including competence mapping, which also includes a self-evaluation related to sustainability</p> <p>b. The reporting is a self-evaluation that is carried out annually</p> <p>c. No special measures or changes in the composition of the highest governing body or the organisation's practices have been implemented as a result of the evaluations.</p>	

2-19	<p>Remuneration policies.</p> <p>a. describe the remuneration policies for members of the highest governance body and senior executives, including:</p> <ul style="list-style-type: none"> i. fixed pay and variable pay; ii. sign-on bonuses or recruitment incentive payments; iii. termination payments; iv. clawbacks; v. retirement benefits; <p>b. describe how the remuneration policies for members of the highest governance body and senior executives relate to their objectives and performance in relation to the management of the organisation's impacts on the economy, environment, and people.</p>	<p>a.</p> <ul style="list-style-type: none"> i. There is only a fixed salary and bonus scheme, no variable salaries ii. No signing bonus agreements iii. No severance agreements iv. No guidelines about clawbacks v. All employees have a collective defined contribution pension for wages up to 12 G <p>b. Bonuses are influenced by financial performance. There is no link between salaries and remuneration, and the environment and society</p>	<p>a. Annual report 2022, page 107</p> <p>a. i. Annual Report 2022, page 110</p>
2-20	<p>Process to determine remuneration.</p> <p>a. describe the process for designing its remuneration policies and for determining remuneration, including:</p> <ul style="list-style-type: none"> i. whether independent highest governance body members or an independent remuneration committee oversees the process for determining remuneration; ii. how the views of stakeholders (including shareholders) regarding remuneration are sought and taken into consideration; iii. whether remuneration consultants are involved in determining remuneration and, if so, whether they are independent of the organisation, its highest governance body and senior executives; <p>b. report the results of votes of stakeholders (including shareholders) on remuneration policies and proposals, if applicable.</p>	<p>a. Guidelines for determining salary and other remuneration to senior executives as well as the Bonus Programme are approved by the Bank's Board of Directors.</p> <ul style="list-style-type: none"> i. Sparebanken Sør has its own remuneration committee ii. The guidelines for remuneration have been drawn up by the Board of Sparebanken Sør. The guidelines have been adopted by the Board of Trustees. Owners of equity certificates and employees are represented on the Board of Directors and the Board of Trustees. iii. Consultants are not involved in the formulation of payroll and remuneration policy <p>b. N/A</p>	<p>a. i. https://www.sor.no/felles/om-sparebanken-sor/styre-ledelse-og-organisasjon/</p> <p>Annual report 2022, page 107</p>
2-21	<p>Annual total compensation ratio.</p> <p>a. report the ratio of the annual total compensation for the organisation's highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual);</p> <p>b. report the ratio of the percentage increase in annual total compensation for the organisation's highest-paid individual to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual);</p> <p>c. report contextual information necessary to understand the data and how the data has been compiled.</p>	<p>a. The ratio of the annual compensation for the highest-paid person in the bank to the median salary in the bank is 4.58</p> <p>b. The salary growth of the highest-paid person was 3.1%, while the median salary increase in the bank was 3.9%, i.e. the highest-paid person received 80% of the salary increase in relation to the median in the bank</p> <p>c. Indicators of salaries are based on the following data:</p> <ul style="list-style-type: none"> - Fixed salary, i.e. excluding bonus - Salary as at 31.12. - Salaries of part-time employees are taken into account in the calculations - Salaries of temporary workers are not taken into account in the calculations 	
Strategy, policy and practice			
2-22	<p>Statement from the CEO on the relevance of sustainability to the organisation and its strategy for addressing sustainability.</p> <p>a. report a statement from the highest governance body or most senior executive of the organisation about the relevance of sustainable development to the organisation and its strategy for contributing to sustainable development.</p>	<p>The bank's mission is to create sustainable growth and development for our region, and sustainability is embedded in and integrated into the bank's overall strategy. We aim to contribute to sustainable development in the region and to be part of the green transition. The challenge moving forward will be to integrate ESG effectively into our business areas, develop and sell sustainable products and services, and issue sustainable bonds in line with market and customer expectations. We have set targets to reduce greenhouse-gas emissions from our lending and investment portfolio by 40 per cent by the end of 2030, and achieve full carbon neutrality by 2050. Our focus on green and sustainable banking, digitalisation and new technology will continue unabated.</p>	<p>a. Annual Report 2022, pages 5, 20-22</p>
2-23	<p>Policy commitments related to responsible business and human rights.</p> <p>a. describe its policy commitments for responsible business conduct, including:</p> <ul style="list-style-type: none"> i. the authoritative intergovernmental instruments that the commitments reference; ii. whether the commitments stipulate conducting due diligence; iii. whether the commitments stipulate applying the precautionary principle; iv. whether the commitments stipulate respecting human rights; <p>b. describe its specific policy commitment to respect human rights, including:</p> <ul style="list-style-type: none"> i. the internationally recognised human rights that the commitment covers; ii. the categories of stakeholders, including at-risk or vulnerable groups, that the organisation gives particular attention to in the commitment; iii. provide links to the policy commitments if publicly available, or, if the policy commitments are not publicly available, explain the reason for this; iv. report the level at which each of the policy commitments was approved within the organisation, including whether this is the most senior level; v. report the extent to which the policy commitments apply to the organisation's activities and to its business relationships; vi. describe how the policy commitments are communicated to workers, business partners, and other relevant parties. 	<p>a.</p> <ul style="list-style-type: none"> ii. There are requirements for reporting the status and development of initiatives in connection with the UN Global Compact and UNEP PRB, but there is no requirement for due diligence. iii. The bank has adopted the UN Global Compact's "precautionary" principles. iv. Yes <p>b. ii. Key UN conventions have been selected based on a risk assessment of assessment of suppliers and business activities, but we have not defined vulnerable groups beyond the fact that these are largely safeguarded by the UN conventions in relation to our geographical area and business activities.</p> <p>d. Board of Directors</p> <p>e. Applies to the organisation's activities, suppliers, and business associates</p> <p>f. All our policies are publicly available on our website. The policies are communicated to relevant users internally and externally and stakeholders through internal courses and training, and in dialogue, meetings, lectures with relevant customers/customer groups and stakeholders</p>	<p>a.</p> <ul style="list-style-type: none"> https://www.sor.no/globalassets/organisasjon/barekraft/responsibelending-policy-sparebanken-sor.pdf https://www.sor.no/globalassets/organisasjon/barekraft/policy-responsible-investment-securities-trading-sparebanken-sor.pdf a, b, i, c. https://www.sor.no/globalassets/organisasjon/barekraft/purchasing-policy-sparebanken-sor.pdf https://www.sor.no/globalassets/organisasjon/barekraft/policy-employee-and-human-rights-sparebanken-sor.pdf https://www.sor.no/globalassets/organisasjon/barekraft/sustainability-strategy-sparebanken-sor.pdf c. https://www.sor.no/felles/om-sparebanken-sor/about/social-responsibility/sustainability-reports/
2-24	<p>Embedding policy commitments.</p> <p>a. describe how it embeds each of its policy commitments for responsible business conduct throughout its activities and business relationships, including:</p> <ul style="list-style-type: none"> i. how it allocates responsibility to implement the commitments across different levels within the organisation; ii. how it integrates the commitments into organisational strategies, operational policies, and operational procedures; iii. how it implements its commitments with and through its business relationships; iv. training that the organisation provides on implementing the commitments. 	<p>a. Policy documents, together with operational guidelines, are reviewed with the respective responsible organisational units and business associates.</p> <ul style="list-style-type: none"> i. Responsibility for the various topics and business areas lies with the division. ii. The commitments are integrated into respective operational guidelines. iii. The commitments are implemented through customer meetings, questionnaires and dialogue. iv. Internal and external courses, training and digital meetings regarding ESG. Workshops and theme-based training. 	<p>a.</p> <ul style="list-style-type: none"> ii. https://www.sor.no/felles/om-sparebanken-sor/about/social-responsibility/sustainability-reports/ iii. https://www.sor.no/globalassets/organisasjon/barekraft/guidelines-for-responsible-purchasing-sparebanken-sor.pdf https://www.sor.no/globalassets/organisasjon/barekraft/guidelines-for-responsible-purchasing-sparebanken-sor.pdf
2-25	<p>Processes to remediate negative impacts.</p> <p>a. describe its commitments to provide for or cooperate in the remediation of negative impacts that the organisation identifies it has caused or contributed to;</p> <p>b. describe its approach to identify and address grievances, including the grievance mechanisms that the organisation has established or participates in;</p> <p>c. describe other processes by which the organisation provides for or cooperates in the remediation of negative impacts that it identifies it has caused or contributed to;</p> <p>d. describe how the stakeholders who are the intended users of the grievance mechanisms are involved in the design, review, operation, and improvement of these mechanisms;</p> <p>e. describe how the organisation tracks the effectiveness of the grievance mechanisms and other remediation processes, and report examples of their effectiveness, including stakeholder feedback.</p>	<p>a. UN Global Compact and UNEP PRB. The Norwegian Transparency Act sets commitments in relation to labour and human rights.</p> <p>c. The Bank has an established system for registering and handling "unwanted incidents". All such incidents are recorded in the Bank's Incident Database and reported quarterly in the risk report to management and the Board of Directors. Measures to reduce or avoid unwanted incidents are included in the Bank's internal control system. Complaints are dealt with centrally by the Bank and any measures and improvements are assessed on the basis of the nature and significance of the complaint. Complaints related to regulatory matters such as data breaches, product information etc. are handled by public complaints bodies such as the Norwegian Data Protection Authority, the Norwegian Financial Services Complaints Board etc.</p> <p>d. Procedures relating to complaints are drawn up by Corporate Staff and adopted by Group Management. The Head of Operational Risk assesses customer complaints and how they should be handled further. There are no other stakeholders involved in customer complaint procedures.</p> <p>e. The complaints procedure is intuitive and is publicly available on the bank's website. Customer Service can be contacted if necessary. Input on complaints procedures in relation to stakeholders is assessed and taken into account, but there has been little input. Complaints are registered in the bank's incident database and are integrated into quarterly risk reports that are submitted to Group Management and the Board. Any key aspects that are important to follow up are integrated into the bank's internal control system.</p>	<p>a.</p> <ul style="list-style-type: none"> https://www.sor.no/globalassets/organisasjon/barekraft/purchasing-policy-sparebanken-sor.pdf b. https://www.sor.no/globalassets/organisasjon/barekraft/customer-complaints-procedure-sparebanken-sor.pdf

2-26	<p>Mechanisms for seeking advice and raising concerns.</p> <p>a. describe the mechanisms for individuals to:</p> <p>i. seek advice on implementing the organisation's policies and practices for responsible business conduct;</p> <p>ii. raise concerns about the organisation's business conduct.</p>	<p>a. Through dialogue and meetings with the bank, customers, suppliers and partners have the opportunity to seek advice on the implementation of policies and practices for responsible business conduct. All of the bank's ESG policies are publicly available on the bank's website.</p> <p>b. Directly in meetings and phone calls, or through complaints and/or notification procedures.</p>	<p>a.</p> <p>i. https://www.sor.no/felles/om-sparebanken-sor/about/social-responsibility/sustainability-reports/</p> <p>ii. https://www.sor.no/globalassets/organisasjon/barekraft/customer-complaints-procedure-sparebanken-sor.pdf</p> <p>https://www.sor.no/globalassets/organisasjon/barekraft/external-whistleblowing-procedure-sparebanken-sor.pdf</p> <p>https://www.sor.no/globalassets/organisasjon/barekraft/internal-whistleblowing-procedure-sparebanken-sor.pdf</p>
2-27	<p>Compliance with laws and regulations.</p> <p>a. report the total number of significant instances of non-compliance with laws and regulations during the reporting period, and a breakdown of this total by:</p> <p>i. instances for which fines were incurred;</p> <p>ii. instances for which non-monetary sanctions were incurred;</p> <p>b. report the total number and the monetary value of fines for instances of non-compliance with laws and regulations that were paid during the reporting period, and a breakdown of this total by:</p> <p>i. fines for instances of non-compliance with laws and regulations that occurred in the current reporting period;</p> <p>ii. fines for instances of non-compliance with laws and regulations that occurred in previous reporting periods;</p> <p>c. describe the significant instances of non-compliance;</p> <p>d. describe how it has determined significant instances of non-compliance.</p>	<p>a. 0</p> <p>i. 0</p> <p>ii. 0</p> <p>b. 0</p> <p>i. 0</p> <p>ii. 0</p> <p>c. 0</p> <p>d. Orders, fees for violations of privacy by the Norwegian Data Protection Authority. Lost cases in front of the Norwegian Financial Services Complaints Board. Lost cases related to violations of product and service information. Lost cases related to violations of marketing communications. Fines from the FSA related to money laundering.</p>	
2-28	<p>Membership in industry organisations or other associations, and national/international lobbyist organisations.</p> <p>a. report industry associations, other membership associations, and national or international advocacy organisations in which it participates in a significant role.</p>	<p>Sparebanken Sør is a member of or has endorsed the following organisations' principles with regard to ESG:</p> <ol style="list-style-type: none"> UN Global Compact UNEP Principles for Responsible Banking Finance Norway's Roadmap for green competitiveness in the finance sector Partnership for Carbon Accounting Financials (PCAF) 	
Stakeholder engagement			
2-29	<p>Approach to stakeholder engagement.</p> <p>a. describe its approach to engaging with stakeholders, including:</p> <p>i. the categories of stakeholders it engages with, and how they are identified;</p> <p>ii. the purpose of the stakeholder engagement;</p> <p>iii. how the organisation seeks to ensure meaningful engagement with stakeholders.</p>		<p>a.i., ii., iii.</p> <p>Sustainability Report, Chapter 2</p>
2-30	<p>Percentage of all employees who are covered by collective bargaining agreements.</p> <p>a. report the percentage of total employees covered by collective bargaining agreements;</p> <p>b. for employees not covered by collective bargaining agreements, report whether the organisation determines their working conditions and terms of employment based on collective bargaining agreements that cover its other employees or based on collective bargaining agreements from other organisations.</p>	<p>a. 100%</p> <p>b. Not relevant</p>	

GRI 2022 – Material topics			
GRI	Indicator	Comments	Source
3-1	<p>Process to determine material topics.</p> <p>a. describe the process it has followed to determine its material topics, including:</p> <p>i. how it has identified actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights, across its activities and business relationships;</p> <p>ii. how it has prioritised the impacts for reporting based on their significance;</p> <p>b. specify the stakeholders and experts whose views have informed the process of determining its material topics.</p>	<p>b. Consultants, auditors, brokers, analysts, the Board and owners have provided useful input on material topics.</p>	<p>a. i., ii.</p> <p>Sustainability Report, Chapter 2</p>
3-2	<p>List of material topics.</p> <p>a. list its material topics;</p> <p>b. report changes to the list of material topics compared to the previous reporting period.</p>	<p>b. There were no changes in material topics. Gender equality and diversity as well as the working environment and employee development were separate topics in 2021. They are now part of the topic Labour and human rights, which has received more focus due to the Norwegian Transparency Act.</p>	<p>a. Sustainability Report, Chapter 2</p>
Employee and Human Rights			
3-3	<p>Management of material topics.</p> <p>For each material topic:</p> <p>a. describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights;</p> <p>b. report whether the organisation is involved with the negative impacts through its activities or as a result of its business relationships, and describe the activities or business relationships;</p> <p>c. describe its policies or commitments regarding the material topic; d. describe actions taken to manage the topic and related impacts, including:</p> <p>i. actions to prevent or mitigate potential negative impacts;</p> <p>ii. actions to address actual negative impacts, including actions to provide for or cooperate in their remediation;</p> <p>iii. actions to manage actual and potential positive impacts; e. report the following information about tracking the effectiveness of the actions taken:</p> <p>i. processes used to track the effectiveness of the actions;</p> <p>ii. goals, targets, and indicators used to evaluate progress;</p> <p>iii. the effectiveness of the actions, including progress toward the goals and targets;</p> <p>iv. lessons learned and how these have been incorporated into the organisation's operational policies and procedures; f. describe how engagement with stakeholders has informed the actions taken in d and e.</p>		<p>Sustainability Report, Sections 3.1 and 2.3</p> <p>https://www.sor.no/globalassets/organisasjon/barekraft/policy-employee-and-human-rights-sparebanken-sor.pdf</p>
401-1	New employee hires and employee turnover.		Scorecard section 1.2
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees.	Part-time employees have the same welfare schemes as full-time employees.	
401-3	Number of employees on parental leave.	All employees returned to the bank after their parental leave.	Scorecard section 1.2
404-1	Average hours of training per year per employee.	The bank does not have data for average training per job category.	Scorecard section 1.2
404-2	Programmes for upgrading employee skills and transition assistance programs.	The bank has no programme for transition to retirement.	Sustainability Report, Section 3.4.3
404-3	Percentage of employees receiving regular performance and career	All employees have a mandatory performance review at least once a year.	Scorecard section 1.2
405-1	Composition of governing bodies, management and employee categories.		Scorecard section 1.1
405-2	Ratio of basic salary and remuneration of women to men.		Scorecard section 1.1
406-1	Incidents of discrimination and corrective actions taken.	There were no cases of discrimination.	Scorecard section 1.2
Data protection and information security			

3-3	Management of material topics.		Sustainability Report, Sections 4.1 and 2.3 https://www.sor.no/globalassets/organisasjon/barekraft/privacy-policy-sparebanken-sor.pdf
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data.		Scorecard section 1.3
KPI B1	Orders, fines related to privacy by the Norwegian Data Protection Agency (DPA)	No fines or orders from the Norwegian Data Protection Agency	Sustainability Report, Section 4.1; Scorecard, Section 1.3
KPI B2	Service level agreement (SLA), uptime in % for customer systems.		Sustainability Report, Section 4.1; Scorecard, Section 1.3

Financial crime

3-3	Management of material topics.		Sustainability Report, Sections 5.1 and 2.3 https://www.sor.no/globalassets/organisasjon/barekraft/policy-anti-corruption-and-bribery-sparebanken-sor.pdf https://www.sor.no/globalassets/organisasjon/barekraft/policy-antikorrupsjon-bestikkeser-sparebanken-sor.pdf https://www.sor.no/globalassets/organisasjon/barekraft/anti-money-laundering-anti-terrorism-financing-policy-sparebanken-sor.pdf
205-3	Confirmed incidents of corruption and actions taken.	No incidents of corruption identified.	
KPI C3	Suspicious of money laundering flagged.		Sustainability Report, Section 5.1; Scorecard, Section 1.4
KPI C4	Suspicious of money laundering reported to the National Authority for Investigation and Prosecution of Economic and Environmental Crime (Økokrim).		Sustainability Report, Section 5.1; Scorecard, Section 1.4

Responsible products and services (product information and marketing)

3-3	Management of material topics.		Sustainability Report, Sections 6.1 and 2.3 https://www.sor.no/globalassets/organisasjon/barekraft/marketing-product-information-policy.pdf
417-2	Incidents of non-compliance concerning product and service information and labelling (Norwegian Financial Services Complaints Board).	There were no cases of complaints, fines or warnings for non-compliance regarding products and services, information and labelling.	Scorecard section 1.5
417-3	Incidents of non-compliance concerning marketing communications (Norwegian Financial Services Complaints Board).	There were no cases of complaints, fines or warnings regarding non-compliance with communications and marketing.	Scorecard section 1.5

Responsible and ethical business conduct

3-3	Management of material topics.		Sustainability Report, Sections 7.1 and 2.3 https://www.sor.no/globalassets/organisasjon/corporate-governance-sparebanken-sor.pdf https://www.sor.no/felles/om-sparebanken-sor/about/social-responsibility/ethics-and-transparency/
201-1	Direct economic value generated and distributed.		Annual report 2022, pages 25 and 26. Scorecard, Section 2.1
201-2	Financial implications and other risks and opportunities due to climate change.		https://www.sor.no/globalassets/organisasjon/barekraft/2022-icfd-report-sparebanken-sor.pdf
KPI E1	Customer satisfaction indicator, retail market.		Sustainability Report, Sections 7.1 and 7.5; Scorecard, Section 2.2
KPI E2	Customer satisfaction indicator, corporate market.		Sustainability Report, Sections 7.1 and 7.5; Scorecard, Section 2.2
KPI E3	Complaint cases lost at the Norwegian Financial Services Complaints Board.		Sustainability Report, Chapter 7
KPI E4	Whistleblowing cases, internal and external.		Sustainability Report, Chapter 7
KPI E5	ESG Rating according to Sustainalytics.	Sparebanken Spr aims to have a low risk in terms of ESG rating. This means a score lower than 20 points on the Sustainalytics rating scale.	Sustainability report, Sections 1.3.8 and 7.1

Responsible credit

3-3	Management of material topics.		Sustainability Report, Sections 8.1 and 2.3 https://www.sor.no/globalassets/organisasjon/barekraft/responsibl-e-lending-policy-sparebanken-sor.pdf
F58	The monetary value of products and services developed to make an environmental difference.	The monetary value of products and services is related to green home mortgages and green commercial real estate loans.	Sustainability report, Sections 8.4 and 8.5; Scorecard, Section 2.3

Responsible investments and financing

3-3	Management of material topics.		Sustainability Report, Sections 9.1 and 2.3 https://www.sor.no/globalassets/organisasjon/barekraft/policy-responsible-investment-securities-trading-sparebanken-sor.pdf
KPI G1	Green bonds in the liquidity portfolio.		Sustainability Report, Section 9.1; Scorecard section 2.4 and Scorecard Definition
KPI G2	Financing in line with the Green & Sustainability Bond Framework.		Sustainability Report, Section 9.1; Scorecard section 2.4 and Scorecard Definition

Responsible procurement (environmental impact)

3-3	Management of material topics.		Sustainability Report, Sections 10.1 and 2.3 https://www.sor.no/globalassets/organisasjon/barekraft/policy-ansvarlige-innkjop-sparebanken-sor.pdf
308-1	New suppliers that have been assessed against environmental criteria.	There are nine new suppliers with annual deliveries greater than NOK 1 million, which have been assessed against environmental criteria. These constitute 15.3 per cent of suppliers with deliveries in 2022 that are greater than NOK 1 million.	
308-2	Negative environmental impacts in the supply chain.	There are two suppliers that are considered to have a high risk of negative impact on climate and nature. No other suppliers or subcontractors have been identified that have a significant negative environmental impact. These two suppliers constitute 3.4 per cent of suppliers with deliveries in 2022 that are greater than NOK 1 million. No suppliers have been excluded due to negative impacts on climate and nature.	Sustainability Report, Section 10.1
414-1	New suppliers that have been assessed against social criteria.	There are nine new suppliers with annual deliveries greater than NOK 1 million, which have been assessed against social criteria. These constitute 15.3 per cent of suppliers with deliveries in 2022 that are greater than NOK 1 million.	

414-2	Negative social impacts in the supply chain.	There are three suppliers who state that they have violated labour and human rights. These violations apply to subcontractors. Measures have been implemented by the suppliers, and they have stated that the violations have been rectified. They also state that the seriousness of the violations was of a minor nature. The contracts with the subcontractors have not been terminated, as the violations have been resolved. These three suppliers constitute 5.3 per cent of suppliers with deliveries in 2022 that are greater than NOK 1 million.	Sustainability Report, Section 10.2
KPI HI	Suppliers > NOK 1 million in annual deliveries that are risk assessed in terms of ESG	78,30 %	Sustainability Report, Section 10.1
Climate and nature			
3-3	Management of material topics.		Sustainability Report, Sections 11.1 and 2.3 https://www.sor.no/globalassets/organisasjon/barekraft/policy-klima-miljo-sporebanken-sor.pdf
302-1	Direct energy consumption within the organisation.	Total energy consumption is specified in the climate accounts. Sparebanken Sør consumes energy for its own operations (no sales). The reason why 2017 has been chosen as the baseline for greenhouse-gas reductions is that it is the first year with complete climate data.	Sustainability Report, Section 11.2.1
305-1	Direct (Scope 1) GHG emissions	The reason why 2017 has been chosen as the baseline for goals for greenhouse-gas reductions is that it is the first year with complete climate data. There has been no recalculation of climate data since 2017.	https://www.sor.no/globalassets/organisasjon/barekraft/2022-carbon-accounting-sporebanken-sor.pdf Sustainability Report, Section 11.2.1
305-2	Energy indirect (Scope 2) GHG emissions.		
305-3	Other indirect (Scope 3) GHG emissions.		
KPI I2	Reductions in greenhouse-gas emissions, own activities (Baseline 2017).		Sustainability Report, Section 11.1
KPI I5	Reductions in greenhouse-gas emissions, Lending.	We are working to establish a baseline.	Sustainability Report, Sections 11.1 and 11.2.2
KPI I8	Reductions in greenhouse-gas emissions, Investments.	We are working to establish a baseline.	Sustainability Report, Sections 11.1 and 11.2.2