

Attachments





SpareBank 1 SMN
Energy- and climate
accounts 2022

Our motivation and development

Our group has a social responsibility, and a part of our social responsibility is to stimulate a sustainable development of Mid-Norway. That entails being a driver for green transition and a guide for responsible business culture. The group's long-term goal is to achieve net zero emissions by 2050 and to halve our climate footprint by 2030. This equates to an emission reduction of 8 per cent per year in day-to-day operations. For the loan portfolio we are in the process of establishing transition plans at industry level showing estimated emissions towards 2050. SpareBank 1 SMN is an important contributor to attaining the group's long-term reduction objective.

Through annual reporting we aim to put our stakeholders in a position to understand our impact and give them an opportunity to compare transparent and reliable information across companies and reporting years. We map GHG-emissions, including key performance indicators, in real time by means of our internal management system, enabling us to evaluate the effect of our measures on a continuous basis.

Our reporting aims to give our stakeholders an overview of our GHG-emissions, stated in tonnes of CO₂ equivalents (tCO₂e), and is an integral aspect of our sustainability strategy¹. The energy and climate account, and the underlying data, have for several years been our most important tool in identifying significant emission sources, initiating concrete measures to reduce GHG-emissions and in measuring the result of those measures over time. The banking and finance industry per se has limited direct emissions, and we acknowledge that our contribution to a low emissions society will be through reducing our own emissions, but also through exerting active influence on our customers and suppliers.

We have improved our reporting since 2019. In 2022, for the first time, we have prepared a 'energy and climate account' which includes GHG-emissions linked to our loan portfolio. In addition to utilising in-house competencies, we have this year again opted to collaborate with our subsidiary SpareBank 1 Regnskapshuset SMN AS and Asplan Viak AS as contributors to the preparation of the energy and climate account. This combination of high competency and knowledge of SpareBank 1 SMN is designed to ensure precise estimates and consistency in the calculation of our total climate impact. The combination of competency and knowledge will also enable us to utilise underlying data and the energy and climate account as inputs to corporate governance and internal processes for continuous development and measurement.

Underlying data and reporting standard

Data employed in the energy and climate account stems from both internal and external sources, and are converted to tCO₂e in accordance with the GWP values in IPCC AR5. The energy and climate account has been drawn up in accordance with the GHG-Protocol (GHG-protocol), its standards, recommendations and guidances. The standards applied are the overarching reporting standard "GHG Protocol Corporate Accounting and Reporting Standard", and the guidances for Scope 2 and Scope 3, respectively "GHG Protocol Scope 2 Guidance" and "The Corporate Value Chain (Scope 3) Accounting and Reporting Standard". The GHG protocol is chosen as reporting standard in light of its international standing and its contribution to ensuring relevant, truthful, comparable and understandable information about our GHG-emissions.

The GHG Protocol also has precedence among the standards for reporting GHG-emissions (European Sustainability Reporting Standards (ESRS)), now adopted by the EU Commission, and drawn up by the European Financial Reporting Advisory Group (EFRAG). In order to prepare for future reporting requirements resulting from incorporation of the Corporate Sustainability Reporting Directive (CSRD), and the reporting requirements of ISRS that become applicable to stock exchange listed institutions in 2024, we have this year sought to comply with several of the requirements in the draft version of "[ESRS E1 - Climate Change](#)" in this year's report².



1. <https://www.sparebank1.no/content/dam/SB1/bank/smn/om-oss/Barekraft/barekraftsstrategi-smn-2021-ENG.pdf>

2. Corporate Sustainability Reporting Directive was adopted by the EU Q4 2022. It's **expected** that Norway will follow EU's timeline when incorporating CSRD through the EEA-agreement.

Energi- og klimaregnskap

The changes in GHG-emissions can be summarised in five points:

1. We gathered primary data on electricity in 2022
2. Our activity in 2022 has increased compared with 2021
3. We estimated our loan portfolio with reference to the PCAF in 2022
4. We have included and estimated additional accounting accounts⁵
5. We have changed our calculation methodology

As a step in our improvement, we have in 2022 implemented a model change from Klimakost EU28 to Klimakost FIGARO. The model change involves substantial emission increases in Scope 3 upstream, and we have split the changes into “Actual emission changes” and “Emission changes arising from model change”.⁴

The basis year (2019) is calculated using the same assumptions as for the reporting year in order to allow consistent comparison at all times.

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1. See page 9 for an explanation of the Klimakost FIGARO-modell
 2. See page 9 for an explanation of the Klimakost EU28-modell
 3. Wage earners’ (retail loans) GHG-emissions is estimated based on financed buildings.
 4. See page 6 for a matrix explaining actual emissions changes and emission changes arising from model change.
 5. New estimated financial accounts has net reduced emissions (upstream) 98,78 tCO₂e in 2022.

SpareBank 1 SMN	Base-year (2019)	Previous year (2021)	Reporting period (2022)	Change 2022 / 2021	Target 2030	Change 2022 / 2019
Scope 1 GHG-emissions	Klimakost (FIGARO) ²	Klimakost (EU28) ¹	Klimakost (FIGARO) ²			
Total net Scope 1 GHG-emissions (tCO ₂ e)	0	0	0	0	0	0
Scope 2 GHG-emissions						
Net megawatt-hours (mWh) consumed	2 371,02	2 669,24	2 762,18	3,48 %	947,55	16,50 %
Total net location-based Scope 2 GHG-emissions (tCO ₂ e)	322,46	363,02	375,66	3,48 %	193,48	16,50 %
Total net market-based Scope 2 GHG-emissions (tCO ₂ e)	938,92	1 081,04	684,89	-36,65 %	563,35	-27,06 %
Scope 3 GHG-emissions						
Total net Scope 3 upstream GHG-emissions (tCO ₂ e)	15 474,67	9 359,23	14 764,22	57,75 %	6 184,26	-4,59 %
Purchased goods and services	11 151,17	7 995,19	11 876,13	48,54 %	4 456,42	6,50 %
Capital goods	1 319,96	579,16	1 034,13	78,56 %	527,50	-21,65 %
Transport and distribution	670,89	260,26	317,22	21,89 %	268,11	-52,72 %
Waste from operations	51,36	36,38	35,69	-1,90 %	20,52	-30,50 %
Business travel	2 281,30	488,24	1 501,04	207,44 %	1 368,78	-34,20 %
Total net Scope 3 downstream GHG-emissions (tCO ₂ e)	N/A	1 000 703,76	1 053 525,68	5,28 %	N/A	N/A
Financed emissions	N/A	1 000 703,76	1 053 525,68	5,28 %	N/A	N/A
Agriculture and forestry	N/A	478 168,46	544 194,41	13,81 %	N/A	N/A
Fishery	N/A	59 324,31	38 158,43	-35,68 %	N/A	N/A
Aquaculture	N/A	14 340,68	14 842,38	3,50 %	N/A	N/A
Manufacturing and mining	N/A	28 355,77	28 228,29	-0,45 %	N/A	N/A
Construction, power and water supply	N/A	6 132,46	9 387,96	53,09 %	N/A	N/A
Wholesale and retail trade, hotels and restaurants	N/A	18 498,17	21 740,27	17,53 %	N/A	N/A
Shipping and offshore	N/A	157 741,22	219 144,30	38,93 %	N/A	N/A
Property management	N/A	5 885,08	6 411,93	8,95 %	N/A	N/A
Business services	N/A	16 465,73	16 175,59	-1,76 %	N/A	N/A
Transport and other services	N/A	192 935,52	134 548,53	-30,26 %	N/A	N/A
Public administration	N/A	1,86	1,25	-32,98 %	N/A	N/A
Other sectors	N/A	6 487,93	5 126,77	-20,98 %	N/A	N/A
Wage earners (Retail loans) ³	N/A	16 366,56	15 565,56	-4,89 %	N/A	N/A
Total GHG-emissions						
Total GHG-emissions (location-based) (tCO ₂ e)	N/A	1 010 426,00	1 068 665,55	5,76 %	N/A	N/A
Total GHG-emissions (market-based) (tCO ₂ e)	N/A	1 011 144,03	1 068 974,79	5,72 %	N/A	N/A

Calculation methodology and assumptions

We work in a systematic and targeted manner to understand the impact of our financial activities on our local and international surroundings. As a part of this targeted effort the SpareBank 1 SMN group introduced in 2021 Klimakost¹ as a new method of calculating the company's direct and indirect GHG-emissions. In 2022 we took an extra step forward in understanding our overall climate impact. At the end of 2021 SpareBank 1 SMN joined the Partnership for Carbon Accounting Financials (PCAF), a global collaboration between financial institutions to harmonise estimation, measurement and information about GHG-emissions linked to their loan portfolios. Membership commits us to estimate and publish our financed GHG-emissions within three years. In 2022 – one year after our commitment – we estimated and published our downstream emissions caused by our loan portfolio in an amount of NOK 185 billion in 2021 and NOK 199,6 billion in 2022.

Parts of our loan portfolio (measured in NOK) are included in the accounting account arrangement [Cashpool](#). The emission effect of Cashpool is zero but produces a deviation in loan volume compared with our financial reporting due to differing treatment.

Estimation of GHG-emissions linked to our financed emissions is based on the PCAF's methodology, a methodology recognised by the GHG Protocol, and the data quality of the estimates ranges from 1 (based on the customer's own data) to 5 (based on pure estimates). We seek continuously to enhance the data quality of our emission estimates, but are limited by poor access to reliable data. We are under way on developing transition plans towards zero net emissions for industries we finance, with priority given to the most emissions-intensive industries.

Primary data is obtained for ship fuel consumption in our fishery portfolio for 2021, which substantially increases the data quality of the estimates. Information on ship fuel consumption for 2022 is not yet available, and any reduction of GHG-emissions does not necessarily reflect an actual reduction, but a result of lower data quality.

Agriculture and forestry are the industry that accounts for the largest share of GHG-emissions in our loan portfolio (47.78 per cent in 2021, 51.65 per cent in 2022). In 2022 we performed, in conjunction with Asplan Viak, thoroughgoing analyses with a view to increasing the level of precision in these estimates, in which we estimated the GHG-emissions of each farm using data from the agricultural grants register. This register contains data on livestock numbers, production and area managed.

Collection of primary data from other financed industries to increase the data quality are under way. See the table below for a complete overview of the estimates' data quality.

	PCAF data quality score			PCAF data quality score	
	2021	2022		2021	2022
Agriculture and forestry	3,3	3,4	Property management	4,2	4,2
Fishery	2,6	4,2	Business services	4,4	4,3
Aquaculture	4,0	4,0	Transport and other services	4,1	4,1
Manufacturing and mining	4,0	4,0	Public administration	5,0	5,0
Construction, power and water supply	4,2	4,3	Other sectors	4,2	4,3
Wholesale, retail trade, hotels and restaurants	4,1	4,1	Wage earners	3,0	3,0
Shipping and offshore	4,1	4,2			

Table 1: Data quality of PCAF-estimates

In order to calculate direct and indirect GHG-emissions which do not include financed downstream emissions, we have again utilised [Klimakost](#), a scientific calculation tool developed by Asplan Viak. This calculation tool is utilised to calculate GHG-emissions for the basis year, previous year and current reporting year. The basis year for comparison is set at 2019 and is calculated using the same assumptions as for the reporting year.

All upstream emissions in 2021 are calculated using Klimakost based on EU data, and Klimakost applies a simplification whereby all purchases outside the EU are calculated as if originating in EU technology. In order to increase the underlying data's level of precision we have this year calculated emissions outside the EU using Asplan Viak's FIGARO model². FIGARO calculates goods and services originating outside the EU using its appurtenant technology and points out areas in which we have an opportunity to reduce our indirect and emissions and initiate appropriate action plans. A further distinction is drawn between "Genuine change" and "Model change" to highlight whether an emission increase or emission reduction is the result of improvement or an estimate change. KPI calculations linked to our emissions can be found on page 7.

1. See page 9 for an explanation of Klimakost.

2. See page 9 for an explanation of FIGARO.

Calculation methodology and assumptions, cont.

Klimakost is employed by all companies in the group and aims to provide a detailed picture of our significant emissions sources. In order to raise the precision level, indirect emissions are calculated bottom up using primary data from suppliers. In the case of emission sources where primary data is difficult to come by, GHG-emissions are cost estimated by means of a spend-based method. The combination of primary data and cost-based estimates is intended to form a complete picture of our GHG-emissions, while at the same time enabling concrete measures to be addressed to the most significant sources of GHG-emissions.

GHG-emissions in Scope 2 are calculated using primary data from electricity meters at the company's locations. At the few locations where kWh data has been difficult to come by, we have applied an average calculation of kWh/m² for those locations for which we have obtained kWh data as a proxy. This calculated average is multiplied by the location's m² to arrive at the kWh figure at unmeasured locations. Of total kWh consumption in 2021, 80.98 per cent is actually measured while 19.2 per cent is assessed based on weighted averages of measured consumption. Of total kWh consumption in 2022, 80.92 per cent comprises measured kWh data, and 19.08 per cent is assessed based on weighted averages of measured consumption.

We resolved in 2022 that all purchased energy should be 100 per cent renewable, and accordingly purchased guarantees of origin (GoOs) from [Fjordkraft](#) for 38.78 per cent of our kWh consumption in 2022 (1,071,074 kWh). The location-based emissions linked to these guarantees is identical to the market-based emissions (0 tCO₂e).

Location-based emissions in Scope 2 are calculated based on a climate declaration in respect of physically delivered electricity in accordance with NS3720. NS3720 distinguishes between v1 and v2 energy mix where v1 is the estimated average EU mix in the period 2015-2075. We recognise that Norway is linked up to several countries in the electricity system, and have for that reason chosen to utilise v2, subsidiarily the "Nordic supply mix", to estimate the probable climate effect of our energy-saving measures. Location-based emissions are calculated using a factor yielding an emission of 136 gCO₂e/kWh. Market-based emissions in Scope 2 are calculated based on product declarations from the Norwegian Energy Regulatory Authority (NVE)¹, yielding an emission factor of 396 gCO₂e/kWh for 2019, and 405 gCO₂e/kWh for 2021 and 2022.

When calculating GHG-emissions from capital goods, the capital good's total emissions are divided by the capital good's lifetime. The rationale for such a calculation is to prevent fluctuations between reporting years as a result of substantial investments.

Changes since last year's report

With a view to ensuring comparability between reporting years in the energy and climate account, we have implemented the following changes to the GHG-emissions in 2021:

Physical data on electricity

Last year was the first year of transition to a new calculation methodology, and no physical data on kWh consumption was obtained at the company's locations. This year we have culled physical data on kWh consumption at the company's locations for 2021 and 2022, and the energy and climate account on page 3 is in 2021 updated using physical data, and GHG-emissions in Scope 2 are restated. This reduces GHG-emissions in 2021 by 305.86 tCO₂e, location-based, and increases GHG-emissions by 412.17 tCO₂e, market-based.

Estimation of GHG-emissions in the loan portfolio under PCAF

Our membership of the PCAF commits us to estimate the loan portfolio's GHG-emissions. We have performed an estimation of the loan portfolio for both 2021 and 2022, and have, for 2021 too, included financed GHG-emissions in the energy and climate account. GHG-emissions in 2021 increased by 1,000,703.76 tCO₂e as a result of the change.

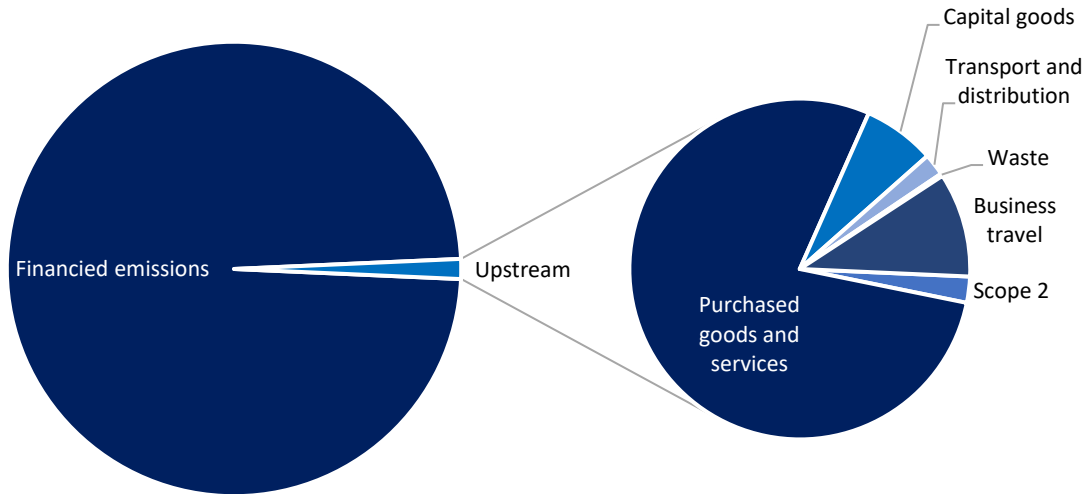
Inclusion of additional accounting accounts in emission estimation upstream

This year we have carried out a revision of which accounting accounts were included in and excluded from our emission estimations. Based on our findings, we have included further accounting accounts in the year's emissions calculation. In order to avoid significant adjustments to attested figures in 2021, we have not adjusted last year with new accounts. Had the adjustment been made, Scope 3 upstream would have been reduced by a net value of 35.07 tCO₂e.

1. <https://www.nve.no/energy-supply/electricity-disclosure/>

Key figures

We have in 2022 a location-based GHG-emission of 1,068,665.55 tCO₂e, representing an increase of 58,239.55 tCO₂e (5.76 per cent) compared with 2021. Of this increase, 597,26 tCO₂e stems from an **actual emission increase** within the company, 4,820.37 tCO₂e from model changes and 52,821.92 tCO₂e from an increase in financed emissions. The GHG-emissions were distributed as follows:



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Scope 2: 0,04 per cent (375,66 tCO₂e)

Scope 3 (oppstrøm): 1,38 per cent (14 764,22 tCO₂e)

Scope 3 (nedstrøm): 98,58 per cent (1 053 525,68 tCO₂e)

Scope 1

Banking and finance have negligible direct GHG-emissions, and we are no exception. In our garage we have two fossil-fuel cars. Their diesel consumption is not obtained, on materiality grounds, nor is it pointed up in Scope 1. The emissions of the cars are nonetheless included, but under business travel in Scope 3.

Scope 2

Indirect GHG-emissions refer to the consumption of purchased energy, including electricity or district heating/cooling in our office premises. Of the bank's office premises, the largest locations dominate kWh consumption. Upon moving office premises, an ambition is that the premises should have an 'A' or 'B' energy rating. Our kWh consumption in 2022 was 2,762,180.14 kWh, with an average of 125.65 kWh/m². Compared with 2021 this is an increase of 92,937.79 kWh, and an increase of 4.23 kWh/m². Read more about the assumptions employed when measuring kWh on page 5.

GHG-emissions in Scope 2 are split into location- and market-based emissions respectively. Location-based emissions came to 375.66 tCO₂e in 2022, an increase of 3.48 per cent compared with 2021. Market-based emissions came to 684.89 tCO₂e in 2022, a reduction of 36.65 per cent compared with 2021. The reduction of our market-based emissions is attributable to purchase of guarantees of origin². In 2022 this reduced our market-based Scope 2 emissions by 433.80 tCO₂e.

Scope 3

A switch from EU28 to FIGARO means that large portions of the increased emissions are linked to change of model. In the table below the share of actual emission changes and the share of emission changes arising from model change is highlighted.

Estimate matrix (tCO ₂ e)	Changes in emissions	Actual emission changes	in %	Changes arising from model change	in %
Scope 2	12,64	12,64	100,00 %	0,00	0,00 %
Scope 3	5 405,00	584,62	10,82 %	4 820,37	89,18 %
Purchased goods and services	3 880,95	185,94	4,79 %	3 695,00	95,21 %
Capital goods	454,97	-172,77	-37,97 %	627,74	137,97 %
Transport and distribution	56,96	-3,58	-6,29 %	60,55	106,29 %
Waste	-0,69	-15,66	N/A	14,97	N/A
Business travel	1 012,81	590,69	58,32 %	422,12	41,68 %
TOTAL	5 417,64	597,26	11,02 %	4 820,37	88,98 %

Table 2: Emission changes EU28/FIGARO

Purchased goods and services account for the majority of the GHG-emissions (upstream) of SpareBank 1 SMN in 2022 (11,876.13 tCO₂e). The emissions refer inter alia to purchases of IT-related services, personnel expenses, lease of premises, cleaning and marketing. Compare with 2021, this represents an **actual increase** in emissions of 185.94 tCO₂e, and an increase in emissions as a result of model changes of 3,695 tCO₂e. Compared with 2021, emissions have risen by 48.54 per cent.

1. See page 5.

Scope 3, cont.

SpareBank 1 SMN has *capital goods* in the form of fixed installations in buildings, property, furniture and fixtures, other fittings, software, and machines. In 2022, capital depreciation of these goods generated 1,034.13 tCO₂e. Compared with 2021 there is an **actual emission reduction** of 172.77 tCO₂e and an increase in emissions of 627.74 tCO₂e as a result of estimate changes. All things considered, emissions have risen by 78.56 per cent compared with 2021.

GHG-emissions linked to *transport and distribution* comprise transport of valuables, postage and haulage of various goods, totalling 317.22 tCO₂e in 2022. Compared with 2021 there is an **actual emissions reduction** of 3.58 tCO₂e, due mainly to a decline in transport of valuables and an increase in postage as a result of a higher level of activity in the company. Estimate changes comprise 60.55 tCO₂e and, all things considered, emissions have risen by 21.89 per cent.

GHG-emissions from *waste* include all forms of waste management (residual waste, paper, glass, plastic), and total 35.69 tCO₂e in 2022. Compared with 2021, GHG-emissions have **in real terms been reduced** by 15.66 tCO₂e, where estimate changes increase emissions by 14.97 tCO₂e. All things considered, emissions have been reduced by 1.9 per cent.

Business travel includes air travel and mileage allowance to employees who use their private car for business purposes, amounts to 1,501.04 tCO₂e in 2022. We see an **actual emissions increase** of 590.69 tCO₂e as a result of higher activity levels, and the increase is in keeping with our expectations inasmuch as 2021 was a year impacted by the Covid pandemic. The model change accounts for an increase of 422.12 tCO₂e, and, viewed overall, emissions have tripled compared with 2021.

Financed emissions include our total portfolio of loans to retail and corporate customers. In 2022 we lent NOK 199.6 billion to our customers¹, which equates to GHG-emissions of 1,053,525.68 tCO₂e, an increase of 5.28 per cent compared with 2021. The increase in GHG-emissions stems from a higher lending volume, and not from an increase in emissions intensity in the industries to which we lend money.

Sector	Lent amount (in NOK 1000)			GHG-intensity (scope 1 og 2)		
	2021	2022	Change (%)	2021	2022	Change (%)
Agriculture and forestry	9 422 675	10 690 164	13,45 %	50,75	50,91	0,31 %
Fishery	5 837 722	7 000 028	19,91 %	10,16	5,45	-46,36 %
Aquaculture	1 925 302	2 311 619	20,07 %	7,45	6,42	-13,80 %
Manufacturing and mining	1 994 151	2 467 579	23,74 %	14,22	11,44	-19,55 %
Construction, power and water supply	3 158 469	4 356 261	37,92 %	1,94	2,16	10,99 %
Wholesale, retail trade, hotels and restaurants	2 441 048	2 768 196	13,40 %	7,58	7,85	3,64 %
Shipping and offshore	4 665 123	5 364 358	14,99 %	33,81	40,85	20,82 %
Property management	16 819 854	18 628 543	10,75 %	0,35	0,34	-1,63 %
Business services	4 457 030	3 428 219	-23,08 %	3,69	4,72	27,72 %
Transport and other services	5 613 045	5 294 939	-5,67 %	34,37	25,41	-26,07 %
Public administration	1 540	1 041	-32,39 %	1,21	1,20	-0,88 %
Other sectors	1 354 254	1 058 059	-21,87 %	4,79	4,85	1,14 %
Wage earners	127 032 721	134 905 091	6,20 %	0,13	0,12	-10,43 %

Table 3: Lent amount and GHG-intensity per industry

Agriculture and forestry, fishery, shipping and offshore, and transport and other services makes up 13.83 per cent of our loan portfolio measured in NOK, but 88.85 per cent of our loan portfolio measured in tCO₂e. Of the four most emissions-intensive industries, emissions intensity approximately 0 or reduced², with the exception of shipping and offshore (28.2 per cent increase). We work on a continuous basis to reduce our customers' emissions through insight-building and advisory activities, and it is through that work that we as a bank aspire to a driver for green transition.

1. For SpareBank 1 SMN the financial accounts' note 8 includes accrued, non-capitalised interests amounting to MNOK 462, and gross positions for cash pool-accounts amounting to MNOK 428. In table 3 this is not included, and causes a deviation in total lent amount.

2. Fishery's GHG-intensity is reduced by 46,36 %, but the data quality of the estimates are also reduced. Reduced data quality affects the GHG-intensity, and the GHG-intensity is thus not representative. See page 4 for an explanation of the estimates' data quality.

Other key figures

In order to make use of the energy and climate account in developing action plans, and to monitor the trend in emissions, activity level and emission intensities, we measure various key figures in the table below.

GHG-intensity per NOK 1000	Base-year (2019)	Previous year (2021)	Reporting period (2022)	Change 2022 / 2021	Change 2022 / 2019
Total net turnover (in NOK 1000)	3 386 279	3 561 722	4 036 282	13,32 %	19,20 %
Operating income	3 356 615	3 514 309	3 981 464	13,29 %	18,62 %
Other operating income	29 664	47 412	54 818	15,62 %	84,80 %
Total GHG-emissions (location-based) per 1000 NOK (kgCO ₂ e / total turnover)	N/A	283,690340	300,041857	5,76 %	N/A
Total GHG-emissions (market-based) per 1000 NOK (kgCO ₂ e / total turnover)	N/A	283,891935	300,128678	5,72 %	N/A
GHG-intensity per NOK 1000 lent amount	Base-year (2019)	Previous year (2021)	Reporting period (2022)	Change 2022 / 2021	Change 2022 / 2019
Total lent amount (in NOK 1000)	159 574 000	185 157 000	199 637 000	7,82 %	25,11 %
GHG-intensity scope 1 + 2 (kgCO ₂ e / NOK 1000 lent amount)	0,0020207	0,0019606	0,0018817	-4,02 %	-6,88 %
GHG-intensity scope 3 upstream (kgCO ₂ e / NOK 1000 lent amount)	0,0969749	0,0505475	0,0739553	46,31 %	-23,74 %
GHG-intensity scope 3 downstream (kgCO ₂ e / NOK 1000 lent amount)	N/A	5,4046229	5,2772065	-2,36 %	N/A
GHG-intensity per man-year	Base-year (2019)	Previous year (2021)	Reporting period (2022)	Change 2022 / 2021	Change 2022 / 2019
Amount of man-years	619	646	664	2,79 %	7,27 %
GHG-intensity scope 1 + 2 (kgCO ₂ e / man-years)	520,94	561,95	565,75	0,68 %	8,60 %
GHG-intensity scope 1 + 2 + 3 (upstream) (kgCO ₂ e / man-years)	24 999,46	14 487,97	22 235,27	53,47 %	-11,06 %
GHG-intensity business travel (kgCO ₂ e / man-years)	3 685,45	755,79	2 260,61	199,11 %	-38,66 %

Table 4: Other key figures

Explanation of models

Klimakost

Klimakost is a tool used to calculate the direct and indirect climate impact of organisations, companies, projects etc. This tool combines accounting information (and quantities for some inputs) with an emission model estimating total life cycle emissions associated with the various inputs and goods/services consumed.

Klimakost employs an environmentally extended input-output analysis (EEIOA). EEIOA is relatively rough-hewn and suited to top-down analyses capable of rapidly producing estimates of what is significant and insignificant for an organisation's footprint. This enables speedy screening of the overall climate footprint with a consistent methodology. The model also enables analysis of an entire nation's footprint, including import of goods from other countries (so-called multiregional models).

In 2022 Klimakost was extended in order to perform more detailed analyses also of countries outside Europe. The new calculation model is referred to as FIGARO (**F**ull **I**nternational and **G**lobal **A**ccounts for **R**esearch in input-**O**utput analysis). FIGARO takes in emissions from 46 regions, of which 31 are European countries, 14 are outside Europe and one is an assortment covering the rest of the world. Businesses that purchase goods and services from countries outside the EU will experience larger indirect GHG-emissions.

Since the model include all types of economic activity, including services production, it does not suffer the same system limitations as other carbon accounting methods. However, this completeness and simplicity comes at the expense of specificity, such that evaluating some actions and trends might require more specific data and methods in addition.

Klimakost has been utilised to prepare carbon accounting reports for a large number of Norwegian municipalities, companies and organizations. Multiple universities and colleges have also used the tool, and an early analysis performed for the NTNU has been published in an international journal. The underlying models have also been used to calculate the carbon footprint of Norwegian government procurements and the carbon footprint of Norwegian households.

Partnership for Carbon Accounting Financials (PCAF)

See the [PCAF's webpages](#) for a detailed explanation of the methodology.

Specific application of the GHG Protocol

The GHG Protocol requires organisational boundaries to be set for the recognition of GHG-emissions in the consolidated energy and climate account, but also in company-specific energy and climate accounts. The boundary selected should be the one that makes for a complete picture of the company's GHG-emissions, and which in the best possible manner reflects commercial reality. A choice may be made between the equity share approach and the financial/operational control approach. In some cases, a combination of approaches will be needed in which one approach is applied for consolidation purposes and one approach for recognition.

The operational control approach is employed to define which GHG-emissions are to be included in the energy and climate account of companies' business assets and what emissions are to be classified into the various scopes. Under the operational control approach, emissions are included from activities over which the organisation exerts significant control.

In January 2015 the GHG Protocol Scope 2 Guidance was published, accompanied by a dual requirement to report emissions from energy consumption: location-based and market-based.

Location-based approach: This emission factor is based on actual emissions linked to energy consumption within defined geographical areas. Within this area there are various energy producers that utilise a mix of energy bearers where fossil energy bearers (coal, gas and oil) entail direct emissions of greenhouse gases. In Norway, electricity derives mainly from renewable energy sources, and the location-based emission factor is grounded in the AIB's calculations for Nordic mix.

Market-based approach: When a guarantee of origin is purchased, the electricity supplier provides documentary proof that purchased energy stems exclusively from renewable sources with an emission factor of 0 grammes of CO₂e per kWh. Electricity sold without guarantees of origin is based on a European residual mix, and has a high share of fossil fuel. This means that the market-based emission factor is far higher than the location-based factor.



SpareBank 1 SMN-Group
Energy- and climate accounts 2022

Our motivation and development

One of our societal roles is to stimulate a sustainable development of Mid-Norway. That entails being a driver for green transition and a guide for responsible business culture. The group's long-term goal is to achieve net zero emissions by 2050 and to halve our climate footprint by 2030. This equates to an emission reduction of 8 per cent per year in day-to-day operations. For the loan portfolio we are in the process of establishing transition plans at industry level showing estimated emissions towards 2050, which will have a large bearing on how SpareBank 1 SMN and SpareBank 1 Finans Midt-Norge AS conduct their financing activities.

Through annual reporting we aim to put our stakeholders in a position to understand our impact, and give them an opportunity to compare transparent and reliable information across companies and reporting years. In our group we map GHG-emissions, including key performance indicators, in real time by means of our internal management system, enabling us to evaluate the effect of our measures on a continuous basis.

In 2022 a number of solutions were developed to make the business lines aware of their GHG-emissions and to enable them to implement measures. One such measure is the development of a climate solution in EiendomsMegler 1 Midt-Norge's financial management tools which puts department heads in a position to follow the department's GHG-emissions month by month.

Our reporting aims to give our stakeholders an overview of our GHG-emissions, stated in tonnes of CO₂ equivalents (tCO₂e), and is an integral aspect of our sustainability strategy. The carbon accounting report, and the underlying data, have for several years been our most important tool in identifying significant emission sources, initiating concrete measures to reduce GHG-emissions and in measuring the result of those measures over time. The banking and finance industry per se has limited direct emissions, and we acknowledge that our contribution to a low emissions society will be through reducing our own emissions, but also through exerting active influence on our customers and suppliers.

We have improved our reporting of GHG-emissions since 2019. In 2022, for the first time, we have prepared an 'energy and climate account' which includes GHG-emissions linked to our loan portfolio. In addition to utilising in-house competencies, we have this year again opted to collaborate with our subsidiary SpareBank 1 Regnskapshuset SMN AS and Asplan Viak AS as contributors to the preparation of the energy and climate account. This combination of high competency and knowledge of SpareBank 1 SMN is designed to ensure precise estimates and consistency in the calculation of our total climate impact. The combination of competency and knowledge will also enable us to utilise underlying data and the energy and climate account as inputs to corporate governance and internal processes for continuous development and measurement.

Underlying data and reporting standard

Data employed in the energy and climate account stems from both internal and external sources, and is converted to tCO₂e using the GWP values in IPCC AR5. The energy and climate account has been drawn up in accordance with the Greenhouse Gas Protocol (GHG Protocol), its standards, recommendations and guidances. The standards employed are the overarching reporting standard "GHG Protocol Corporate Accounting and Reporting Standard", and the guidances for Scope 2 and Scope 3, respectively "GHG Protocol Scope 2 Guidance" and "The Corporate Value Chain (Scope 3) Accounting and Reporting Standard". The GHG protocol is chosen as reporting standard in light of its international standing and its contribution to ensuring relevant, truthful, comparable and understandable information about our GHG-emissions.

The GHG Protocol also has precedence among the standards for reporting GHG-emissions (European Sustainability Reporting Standards (ESRS)), now adopted by the EU Commission, and drawn up by the European Financial Reporting Advisory Group (EFRAG). In order to prepare for future reporting requirements resulting from incorporation of the Corporate Sustainability Reporting Directive (CSRD), and the reporting requirements of ISRS that address stock-exchange-listed institutions in 2024, we have this year sought to comply with several of the requirements in the draft version of "[ESRS E1 -Climate Change](#)" in this year's report².



1. <https://www.sparebank1.no/content/dam/SB1/bank/smn/om-oss/Barekraft/barekraftsstrategi-smn-2021-ENG.pdf>

2. Corporate Sustainability Reporting Directive was adopted by the EU Q4 2022. It's **expected** that Norway will follow EU's timeline when incorporating CSRD through the EEA-agreement.

Energy- and climate accounts

The changes in GHG-emissions can be summarised in five points:

1. We have gathered primary data on electricity in 2022
2. Our activity in 2022 has increased compared with 2021
3. In 2022 we estimated our loan portfolio with reference to the PCAF
4. We have included and estimated further accounting accounts⁶
5. We have changed our calculation methodology

As a step in our improvement, we have in 2022 implemented a model change from Klimakost EU28 to Klimakost FIGARO. The model change involves substantial emission increases in Scope 3 upstream, and w have split the changes into “Actual emission changes” and “Emission changes arising from model change”⁵.

The basis year (2019) is calculated using the same assumptions as for the reporting year in order to allow consistent comparison at all times.

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1. See page 9 for an explanation of the Klimakost FIGARO-model
 2. See page 9 for an explanation of the Klimakost EU28-model.
 3. Wage earners’ (retail loans) GHG-emissions is estimated based on financed buildings.
 4. NOK 6,8bn of 12,1bn of SpareBank 1 Finans Midt-Norge AS' loan portfolio is included. The portfolio includes loans/leasing of fossil cars.
 5. See page 6 for a matrix explaining actual emissions changes and emission changes arising from model change.
 6. New estimated financial accounts has net increased GHG-emissions (upstream) 2 077,38 tCO₂e in 2022.

SpareBank 1 SMN-group	Base-year (2019)	Previous year (2021)	Reporting period (2022)	Change 2022 / 2021	Target 2030	Change 2022 / 2019
Scope 1 GHG-emissions						
	Klimakost (FIGARO) ²		Klimakost (EU28) ¹		Klimakost (FIGARO) ²	
Total net Scope 1 GHG-emissions (tCO ₂ e)	0	0	0	0	0	0
Scope 2 GHG-emissions						
Net megawatt-hours (mWh) consumed	5 707,10	5 650,03	5 757,74	1,91 %	2280,77	0,89 %
Total net location-based Scope 2 GHG-emissions (tCO ₂ e)	776,2	768,40	783,05	1,91 %	310,18	0,89 %
Total net market-based Scope 2 GHG-emissions (tCO ₂ e)	2 260,0	2 288,26	1 898,09	-17,05 %	903,19	-16,01 %
Scope 3 GHG-emissions						
Total net Scope 3 upstream GHG-emissions (tCO ₂ e)	22 127,03	11 294,67	20 145,35	78,36 %	8842,79	-8,96 %
Purchased goods and services	15 408,39	9 423,58	15 872,21	68,43 %	6157,77	3,01 %
Capital goods	1 913,61	620,26	1 490,44	140,29 %	764,75	-22,11 %
Transport and distribution	761,80	314,51	364,19	15,80 %	304,45	-52,19 %
Waste from operations	29,13	28,75	35,69	24,12 %	11,64	22,51 %
Business travel	4 014,09	907,56	2 382,82	162,55 %	1604,18	-40,64 %
Total net Scope 3 downstream GHG-emissions (tCO ₂ e)	N/A	1 020 051,62	1 076 599,37	5,54 %	N/A	N/A
Financed emissions	N/A	1 020 051,62	1 076 599,37	5,54 %	N/A	N/A
Agriculture and forestry	N/A	478 168,46	544 194,41	13,81 %	N/A	N/A
Fishery	N/A	59 324,31	38 158,43	-35,68 %	N/A	N/A
Aquaculture	N/A	14 340,68	14 842,38	3,50 %	N/A	N/A
Manufacturing and mining	N/A	28 355,77	28 228,29	-0,45 %	N/A	N/A
Construction, power and water supply	N/A	6 132,46	9 387,96	53,09 %	N/A	N/A
Wholesale and retail trade, hotels and restaurants	N/A	18 498,17	21 740,27	17,53 %	N/A	N/A
Shipping and offshore	N/A	157 741,22	219 144,30	38,93 %	N/A	N/A
Property management	N/A	5 885,08	6 411,93	8,95 %	N/A	N/A
Business services	N/A	16 465,73	16 175,59	-1,76 %	N/A	N/A
Transport and other services	N/A	192 935,52	134 548,53	-30,26 %	N/A	N/A
Public administration	N/A	1,86	1,25	-32,98 %	N/A	N/A
Other sectors	N/A	6 487,93	5 126,77	-20,98 %	N/A	N/A
Wage earners (Retail loans) ³	N/A	16 366,56	15 565,56	-4,89 %	N/A	N/A
Loan/leasing - fossil cars ⁴	N/A	19 347,86	23 073,70	19,26 %	N/A	N/A
Total GHG-emissions						
Total GHG-emissions (location-based) (tCO ₂ e)	N/A	1 032 114,69	1 097 527,78	6,34 %	N/A	N/A
Total GHG-emissions (market-based) (tCO ₂ e)	N/A	1 033 634,55	1 098 642,81	6,29 %	N/A	N/A

Calculation methodology and assumptions

The energy and climate account is based on Klimakost combined with primary data from suppliers and financial data from SpareBank 1 SMN, SpareBank 1 Finans Midt-Norge, SpareBank 1 Regnskapshuset SMN AS, EiendomsMegler 1 Midt-Norge AS, SpareBank 1 Markets AS, SpareBank 1 SMN Kvartalet AS, SpareBank 1 Bygget Steinkjer AS and St. Olavs Plass 1 SMN AS.¹ These companies are recognised using the equity share approach in order to form a consolidated energy and climate account for the group.

We work in a systematic and targeted manner to understand the impact of our financial activities on our local and international surroundings. As a part of this targeted effort the SpareBank 1 SMN group introduced in 2021 Klimakost as a new method of calculating the company's direct and indirect GHG-emissions. In 2022 we took an extra step forward in understanding our overall climate impact. At the end of 2021 SpareBank 1 SMN joined the Partnership for Carbon Accounting Financials (PCAF), a global collaboration between financial institutions to harmonise estimation, measurement and information about GHG-emissions linked to their loan portfolios. Membership commits us to estimate and publish our financed GHG-emissions within three years. In 2022 – one year after our commitment – we estimated and published our downstream emissions caused by our loan portfolio in an amount of NOK 196 billion in 2021 and NOK 212 billion in 2022.

NOK 5.3 billion of the portfolio of SpareBank 1 Finans Midt-Norge AS is not included due to absence of data. Parts of our loan portfolio (measured in NOK) are included in the group account arrangement [Cashpool](#). The emission effect of Cashpool is zero, but a deviation in loan volume is produced compared with our financial reporting due to differing treatment.

Estimation of GHG-emissions linked to our financed emissions is based on the PCAF's methodology, a methodology recognised by the GHG Protocol, and the data quality of the estimates ranges from 1 (based on the customer's own data) to 5 (based on pure estimates). We seek continuously to enhance the data quality of our emission estimates, but are limited by poor access to reliable data. We are under way on developing transition plans towards zero net emissions for industries we finance, with priority given to the most emissions-intensive industries.

Primary data is obtained for ship fuel consumption in our fishery portfolio for 2021, which substantially increases the data quality of the estimates. Information on ship fuel consumption for 2022 is not yet available, and any reduction of GHG-emissions does not necessarily reflect an actual reduction, but a result of lower data quality.

Agriculture and forestry are the industry that accounts for the largest share of GHG-emissions in our loan portfolio (46.88 per cent in 2021, 50.55 per cent in 2022). In 2022 we performed, in conjunction with Asplan Viak, thoroughgoing analyses with a view to increasing the level of precision in these estimates, in which we estimated the GHG-emission of each farm using data from the agricultural grants register. This register contains data on livestock numbers, production and area managed.

We are under way on gathering primary data on other industries in order to increase data quality. See the table below for a complete overview of the estimates' data quality.

	PCAF data quality score			PCAF data quality score	
	2021	2022		2021	2022
Agriculture and forestry	3,3	3,4	Property management	4,2	4,2
Fishery	2,6	4,2	Business services	4,4	4,3
Aquaculture	4,0	4,0	Transport and other services	4,1	4,1
Manufacturing and mining	4,0	4,0	Public administration	5,0	5,0
Construction, power and water supply	4,2	4,3	Other sectors	4,2	4,3
Wholesale, retail trade, hotels and restaurants	4,1	4,1	Wage earners	3,0	3,0
Shipping and offshore	4,1	4,2	Loan/leasing - fossil cars	5,0	4,3

Table 1: Data quality of PCAF-estimates

In order to calculate direct and indirect GHG-emissions which do not include financed downstream emissions, we have again utilised Klimakost, a scientific calculation tool developed by Asplan Viak. This calculation tool is utilised to calculate GHG-emissions for the basis year, previous year and current reporting year. The basis year for comparison is set at 2019, and is calculated using the same assumptions as for the reporting year.

All upstream emissions in 2021 are calculated using Klimakost based on EU data, and we apply a simplification whereby all purchases outside the EU are calculated as if originating in EU technology. In order to increase the underlying data's level of precision we have this year calculated emissions outside the EU using Asplan Viak's FIGARO model². FIGARO calculates goods and services originating outside the EU using its appurtenant technology, and points out areas in which we have an opportunity to reduce our indirect and emissions and initiate appropriate action plans. A further distinction is drawn between "Actual change" and "Model change" to highlight whether an emission increase or emission reduction is the result of an improvement or of an estimate change. KPI calculations linked to our emissions can be found on page 6, 7 and 8.

1. Challenges attached to estimating the GHG-emissions of SpareBank 1 SMN Invest AS' investment portfolio has led to us setting estimation, and inclusion, of the subsidiary's GHG-emission (upstream and downstream) as a target for 2023.

2. See page 9 for an explanation of FIGARO.

Calculation methodology and assumptions, cont.

Klimakost is employed by all companies in the group, and aims to provide a detailed picture of our significant emission sources. In order to raise the precision level, indirect emissions are calculated bottom-up using primary data from suppliers. In the case of emission sources where primary data are difficult to come by, GHG-emissions are cost estimated by means of a spend-based method. The combination of primary data and cost-based estimates is intended to form a complete picture of our GHG-emissions, while at the same time enabling concrete measures to be directed to the most significant sources of GHG-emissions.

GHG-emissions in Scope 2 are calculated using primary data from electricity meters at the group's locations. At the few locations where kWh data has been difficult to come by, we have applied an average calculation of kWh/m² for those locations for which we have obtained kWh data as a proxy. This calculated average is multiplied by the location's m² to arrive at the kWh figure at unmeasured locations. Of total kWh consumption in 2021, 80.98 per cent is actually measured while 19.2 per cent is assessed based on weighted averages of measured consumption. Of total kWh consumption in 2022, 80.92 per cent comprises measured kWh data, and 19.08 per cent is assessed based on weighted averages of measured consumption.

We resolved in 2022 that all purchased energy should be 100 per cent renewable, and have accordingly purchased guarantees of origin (GoOs) from Fjordkraft for 18.60 per cent of our kWh consumption in 2022 (1,071,074 kWh). The location-based emissions linked to these guarantees is identical to the market-based emissions (0 tCO₂e).

Location-based emissions in Scope 2 are calculated based on a climate declaration in respect of physically delivered electricity in accordance with NS3720. NS3720 distinguishes between v1 and v2 energy mix where v1 is the estimated average for Norwegian mix in the period 2015-2075 and v2 is the estimated average for EU mix in the period 2015-2075. We recognise that Norway is linked up to several countries in the electricity system, and have for that reason chosen to utilise v2, subsidiarily the "Nordic supply mix", to estimate the probable climate effect of our energy-saving measures. Location-based emissions are calculated using a factor yielding an emission of 136 gCO₂e/kWh. Market-based emissions in Scope 2 are calculated based on product declarations from the Norwegian Energy Regulatory Authority (NVE)¹, yielding an emission factor of 396 gCO₂e/kWh for 2019, and 405 gCO₂e/kWh for 2021 and 2022.

When calculating GHG-emissions from capital goods, the capital good's total emissions are divided by the capital good's lifetime. The rationale for such a calculation is to prevent fluctuations between reporting years as a result of substantial investments.

Changes since last year's report

With a view to ensuring comparability between reporting years in the energy and climate account, we have implemented the following changes to the GHG-emissions in 2021:

Physical data on electricity

Last year was the first year of transition to a new calculation methodology, and no physical data on kWh consumption was obtained at the company's locations. This year we have culled physical data on kWh consumption at the company's locations for 2021 and 2022, and the energy and climate account on page 3 is in 2021 updated using physical data, and GHG-emissions in Scope 2 are restated. This reduces GHG-emissions in 2021 by 477.96 tCO₂e, location-based, and increases GHG-emissions by 1,041.90 tCO₂e, market-based.

Estimation of GHG-emissions in the loan portfolio under PCAF

Our membership of the PCAF commits us to estimate the loan portfolio's GHG-emissions. We have performed an estimation of the loan portfolio for both 2021 and 2022, and have, for 2021 too, included financed GHG-emissions in the energy and climate account. GHG-emissions in 2021 increased by 1,020,051.62 tCO₂e as a result of the change.

Inclusion of other subsidiaries

Following last year's submission, energy and climate accounts were prepared for SpareBank 1 SMN Kvartalet AS, St. Olavs Plass 1 SMN and SpareBank 1 Bygget Steinkjer AS. By including these companies based on holding in the figures for 2021, total emissions have increased by 165.50 tCO₂e – by, respectively, 54.54 tCO₂e in location-based scope 2 and 110.96 tCO₂e in scope 3.

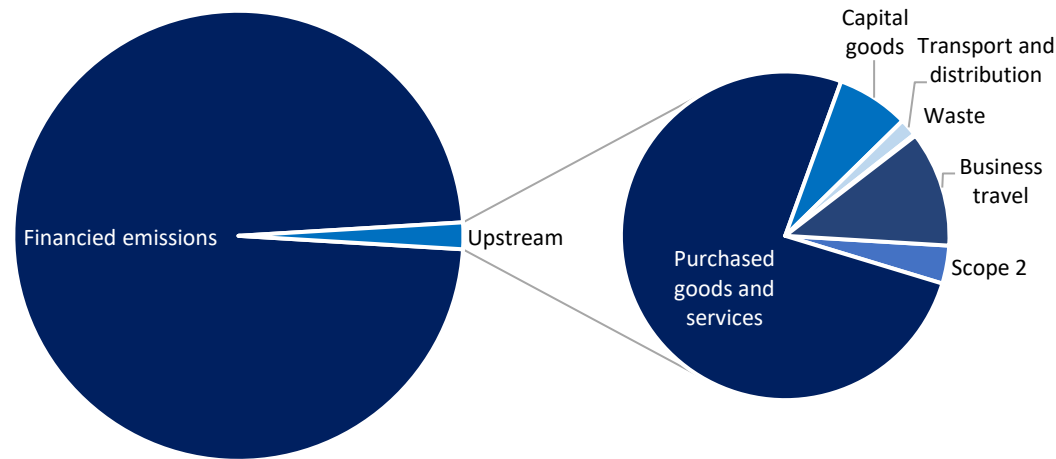
Inclusion of additional accounting accounts in emission estimation upstream

This year we have carried out a revision of accounting accounts that were included in, and excluded from, our emission estimations. Based on our findings, we have included further accounting accounts in the year's emissions calculation. In order to avoid significant adjustments to attested figures in 2021, we have not adjusted last year with new accounts. Had the adjustment been made, Scope 3 upstream would have increased by 995.21 tCO₂e.

1. <https://www.nve.no/energy-supply/electricity-disclosure/>

Key figures

We have in 2022 a location-based GHG-emission of 1,097,527.78 tCO₂e, representing an increase of 65,533.98 tCO₂e (6.35 per cent) compared with 2021. Of this increase, 647.54 tCO₂e stems from a net actual emission increase within the company, 8,217.79 tCO₂e from model changes and 56,547.75 tCO₂e from an increase in financed emissions. The GHG-emissions were distributed as follows:



Scope 2: 0,07 per cent (783,05 tCO₂e)

Scope 3 (upstream): 1,84 per cent (20 145,35 tCO₂e)

Scope 3 (downstream): 98,09 per cent (1 076 599,37 tCO₂e)

Scope 1

Banking and finance have negligible direct GHG-emissions, and we are no exception. In our garage at the group's head office at Søndre Gate no. 4, we have two fossil-fuel cars. Their diesel consumption has not been ascertained, on materiality grounds, nor is it pointed up in Scope 1. The emissions of the cars are nonetheless included, but under *business travel* in Scope 3.

Scope 2

Indirect GHG-emissions refer to the consumption of purchased energy, including electricity or district heating/cooling in the group's office premises. Among the group's office premises, the largest locations dominate kWh consumption. When moving office premises, an ambition is that the premises should have an 'A' or 'B' energy rating. Our kWh consumption in 2022 was 5,757,375.55 kWh, at an average of 125.79 kWh/m². Compared with 2021 this is an increase of 107,700.85 kWh, and an increase of 2.35 kWh/m². Read more about the assumptions employed when measuring kWh on page 5.

GHG-emissions in Scope 2 are split into location- and market-based emissions respectively. Location-based emissions came to 783.05 tCO₂e in 2022, an increase of 1.91 per cent compared with 2021. Market-based emissions came to 1,898.09 tCO₂e in 2022, a reduction of 17.05 per cent compared with 2021. The reduction in our market-based emissions is attributable to purchase of guarantees of origin . In 2022 this reduced our market-based Scope 2 emissions by 433.80 tCO₂e.

Scope 3

Large portions of the increased emissions are linked to the model change from EU28 to FIGARO. means that large portions of the increased emissions are linked to change of model. In the table below, the share of actual emission change, and the share of emissions arising from model change, are highlighted.

Estimate matrix (tCO ₂ e)	Changes in emissions	Actual emission changes	in %	Changes arising from model changes	in %
Scope 2	14,65	14,65	100,00 %	0,00	0,00 %
Scope 3	8 850,68	632,89	7,15 %	8 217,79	92,85 %
Purchased goods and services	6 448,63	240,50	3,73 %	6 208,13	96,27 %
Capital goods	870,18	-367,02	-42,18 %	1 237,20	142,18 %
Transport and distribution	49,68	-16,19	-32,60 %	65,87	132,60 %
Waste	6,94	-3,49	N/A	10,42	N/A
Business travel	1 475,26	779,09	52,81 %	696,17	47,19 %
SUM	8 865,33	647,54	7,30 %	8 217,79	92,70 %

Table 2: Emission changes EU28/FIGARO

Purchased goods and services account for the majority of the GHG-emissions (upstream) of the group in 2022 (15,864.38 tCO₂e). The emissions refer inter alia to purchases of IT-related services, personnel expenses, lease of premises, cleaning and marketing. Compare with 2021, this represents an **actual increase** in emissions of 240.50 tCO₂e, and an increase in emissions resulting from model changes of 6,208.13 tCO₂e. Compared with 2021, emissions have risen by 68.43 per cent.

Scope 3 forts.

SpareBank 1 SMN has *capital goods* in the form of fixed installations in buildings, property, furniture and fixtures, other fittings, software, and machines. In 2022, capital depreciation of these goods generated 1,490.44 tCO₂e. Compared with 2021 there is an **actual emissions reduction** of 367.02 tCO₂e, and an increase of 1,237.20 tCO₂e in emissions resulting from model changes. All things considered, emissions have risen by 140.29 per cent compared with 2021.

GHG-emissions linked to *transport and distribution* comprise transport of valuables, postage and haulage of various goods, totalling 364.19 tCO₂e in 2022. Compared with 2021 there is an **actual emissions reduction** of 16.19 tCO₂e, due mainly to a decline in transport of valuables owing to less use of cash, and an increase in postage as a result of a higher level of activity in the group. Estimate changes represent an increase of 65.87 tCO₂e and, all things considered, emissions have risen by 15.80 per cent.

GHG-emissions from *waste* include all forms of waste management (residual waste, paper, glass, plastic), and total 35.69 tCO₂e in 2022. Compared with 2021, GHG-emissions have in **real terms been reduced** by 3.49 tCO₂e, where estimate changes increase emissions by 10.42 tCO₂e. All things considered, emissions have been reduced by 24.12 per cent.

Business travel includes air travel and mileage allowance to employees who use their private car for business purposes, and amounts to 2,382.82 tCO₂e in 2022. We see an **actual emissions increase** of 779.09 tCO₂e as a result of higher activity levels, and the increase is in keeping with our expectations. The model change accounts for an increase of 696.17 tCO₂e, and, viewed overall, emissions have risen by 162.55 per cent compared with 2021.

Financed emissions include the group's total portfolio of loans to retail and corporate customers¹. In 2022 we have outstanding loans to our customers worth NOK 212 billion², which equates to GHG-emissions of 1,076,599.37 tCO₂e, an increase of 5.54 per cent compared with 2021. The increase in GHG-emissions stems from a higher lending volume, and not from an increase in GHG-intensity in the industries to which we lend money.

Sector	Lent amount (in NOK 1000)			GHG-intensity (scope 1 og 2)		
	2021	2022	Change (%)	2021	2022	Change (%)
Agriculture and forestry	9 422 675	10 690 164	13,45 %	50,75	50,91	0,31 %
Fishery	5 837 722	7 000 028	19,91 %	10,16	5,45	-46,36 %
Aquaculture	1 925 302	2 311 619	20,07 %	7,45	6,42	-13,80 %
Manufacturing and mining	1 994 151	2 467 579	23,74 %	14,22	11,44	-19,55 %
Construction, power and water supply	3 158 469	4 356 261	37,92 %	1,94	2,16	10,99 %
Wholesale, retail trade, hotels and restaurants	2 441 048	2 768 196	13,40 %	7,58	7,85	3,64 %
Shipping and offshore	4 665 123	5 364 358	14,99 %	33,81	40,85	20,82 %
Property management	16 819 854	18 628 543	10,75 %	0,35	0,34	-1,63 %
Business services	4 457 030	3 428 219	-23,08 %	3,69	4,72	27,72 %
Transport and other services	5 613 045	5 294 939	-5,67 %	34,37	25,41	-26,07 %
Public administration	1 540	1 041	-32,39 %	1,21	1,20	-0,88 %
Other sectors	1 354 254	1 058 059	-21,87 %	4,79	4,85	1,14 %
Wage earners	127 032 721	134 905 091	6,20 %	0,13	0,12	-10,43 %
Loan/leasing - fossil cars	4 400 000	6 764 000	53,73 %	7,78	6,28	-19,28 %

Table 3: Lent amount and GHG-intensity per industry

Agriculture and forestry, fishery, transport and other services along with shipping and offshore, make up 13.51 per cent of our loan portfolio measured in NOK, but 86.94 per cent of our loan portfolio measured in CO₂e. In the four most emissions-intensive industries, emissions intensity is reduced³ with the exception of shipping and offshore (20.82 per cent increase). The group works on a continuous basis to reduce our customers' emissions through insight-building and advisory activities, and it is through that work that we as a bank aspire to be a driver for green transition.

1. Loan portfolio includes SpareBank 1 SMN (Retail and corporate) and SpareBank 1 Finans Midt-Norge AS.
2. For SpareBank 1 SMN the financial accounts' note 8 includes accrued, non-capitalised interests amounting to MNOK 462, and gross positions for cash pool-accounts amounting to MNOK 428. In table 3 this is not included, and causes a deviation in total lent amount. NOK 5,3bn of SpareBank 1 Finans Midt-Norge AS' portfolio is not included due to lack of reliable data.

3. Fishery's GHG-intensity is reduced by 46,36 %, but the data quality of the estimates are also reduced. Reduced data quality affects the GHG-intensity, and the GHG-intensity is thus not representative. See page 4 for an explanation of the estimates' data quality.

Other key figures

In order to make use of the energy and climate account in developing action plans, and to observe the trend in emissions, activity level and emission intensities, we measure various key figures in the table below.

GHG-intensity per NOK 1000	Base-year (2019)	Previous year (2021)	Reporting period (2022)	Change 2022 / 2021	Change 2022 / 2019
Total net turnover (in NOK 1000)¹	4 599 365	5 125 583	5 635 675	9,95 %	22,53 %
Operating income	3 757 180	3 989 969	4 398 754	10,25 %	17,08 %
Other operating income	842 186	1 135 614	1 236 922	8,92 %	46,87 %
Total GHG-emissions (location-based) per 1000 NOK (kgCO ₂ e / total turnover)	N/A	201,37	194,75	-3,29 %	N/A
Total GHG-emissions (market-based) per 1000 NOK (kgCO ₂ e / total turnover)	N/A	201,66	194,94	-3,33 %	N/A
GHG-intensity per NOK 1000 lent amount	Base-year (2019)	Previous year (2021)	Reporting period (2022)	Change 2022 / 2021	Change 2022 / 2019
Total lent amount (in NOK 1000)	158 966 000	196 115 000	212 614 000	8,41 %	33,75 %
GHG-intensity scope 1 + 2 (kgCO ₂ e / NOK 1000 lent amount)	0,0048826	0,0039181	0,0036830	-6,00 %	-24,57 %
GHG-intensity scope 3 upstream (kgCO ₂ e / NOK 1000 lent amount)	0,1391935	0,0575921	0,0947508	64,52 %	-31,93 %
GHG-intensity scope 3 downstream (kgCO ₂ e / NOK 1000 lent amount)	N/A	5,2012932	5,0636335	-2,65 %	N/A
GHG-intensity per man-year	Base-year (2019)	Previous year (2021)	Reporting period (2022)	Change 2022 / 2021	Change 2022 / 2019
Amount of man-years	1 509	1 482	1 592	7,42 %	5,50 %
GHG-intensity scope 1 + 2 (kgCO ₂ e / man-years)	514,36	518,49	491,87	-5,14 %	-4,37 %
GHG-intensity scope 1 +2 + 3 (upstream) (kgCO ₂ e / man-years)	14 663,37	7 621,23	12 654,11	66,04 %	-13,70 %
GHG-intensity business travel (kgCO ₂ e / man-years)	2 660,10	612,39	1 496,75	144,41 %	-43,73 %

Table 4: Key figures

1. Total net turnover is recognised based on the ownership share the Group has in the companies included in the energy- and climate accounts. See page 4.

Explanation of models

Klimakost

Klimakost is a tool used to calculate the direct and indirect climate impact of organisations, companies, projects etc. This tool combines accounting information (and quantities for some inputs) with an emission model estimating total life cycle emissions associated with the various inputs and goods/services consumed.

Klimakost employs an environmentally extended input-output analysis (EEIOA). EEIOA is relatively rough-hewn and suited to top-down analyses capable of rapidly producing estimates of what is significant and insignificant for an organisation's footprint. This enables speedy screening of the overall climate footprint with a consistent methodology. The model also enables analysis of an entire nation's footprint, including import of goods from other countries (so-called multiregional models).

In 2022 Klimakost was extended in order to perform more detailed analyses also of countries outside Europe. The new calculation model is referred to as FIGARO (**F**ull **I**nternational and **G**lobal **A**ccounts for **R**esearch in input-**O**utput analysis). FIGARO takes in emissions from 46 regions, of which 31 are European countries, 14 are outside Europe and one is an assortment covering the rest of the world. Businesses that purchase goods and services from countries outside the EU will experience larger indirect GHG-emissions.

Since the model include all types of economic activity, including services production, it does not suffer the same system limitations as other carbon accounting methods. However, this completeness and simplicity comes at the expense of specificity, such that evaluating some actions and trends might require more specific data and methods in addition.

Klimakost has been utilised to prepare carbon accounting reports for a large number of Norwegian municipalities, companies and organizations. Multiple universities and colleges have also used the tool, and an early analysis performed for the NTNU has been published in an international journal. The underlying models have also been used to calculate the carbon footprint of Norwegian government procurements and the carbon footprint of Norwegian households.

Partnership for Carbon Accounting Financials (PCAF)

See the [PCAF's webpages](#) for a detailed explanation of the methodology.

Specific application of the GHG Protocol

The GHG Protocol requires organisational boundaries to be set for the recognition of GHG-emissions in the consolidated energy and climate account, but also in company-specific energy and climate accounts. The boundary selected should be the one that makes for a complete picture of the company's GHG-emissions, and which in the best possible manner reflects commercial reality. A choice may be made between the equity share approach and the financial/operational control approach. In some cases, a combination of approaches will be needed in which one approach is applied for consolidation purposes and one approach for recognition.

The operational control approach is employed to define which GHG-emissions are to be included in the energy and climate account of companies' business assets and what emissions are to be classified into the various scopes. Under the operational control approach, emissions are included from activities over which the organisation exerts significant control.

In January 2015 the GHG Protocol Scope 2 Guidance was published, accompanied by a dual requirement to report emissions from energy consumption: location-based and market-based.



Location-based approach: This emission factor is based on actual emissions linked to energy consumption within defined geographical areas. Within this area there are various energy producers that utilise a mix of energy bearers where fossil energy bearers (coal, gas and oil) entail direct emissions of greenhouse gases. In Norway, electricity derives mainly from renewable energy sources, and the location-based emission factor is grounded in the AIB's calculations for Nordic mix.

Market-based approach: When a guarantee of origin is purchased, the electricity supplier provides documentary proof that purchased energy stems exclusively from renewable sources with an emission factor of 0 grammes of CO₂e per kWh. Electricity sold without guarantees of origin is based on a European residual mix, and has a high share of fossil fuel. This means that the market-based emission factor is far higher than the location-based factor.


GRI Index

The table shows SpareBank 1 SMN's reporting for 2022 with reference to the GRI Universal Standards 2021.

GRI-indicator	Name	Description of the indicator	Response in annual report	Source
GENERAL INFORMATION				
Organisation profile				
2-1	Organizational details	Name of the organization	SpareBank 1 SMN	
2-6	Activities and workers	Activities, product and services provided by the organization	This is SpareBank 1 SMN - Subsidiaries	
2-1	Organizational details	Location of the organization's headquarters	Søndre Gate 4, 7011 TRONDHEIM	
2-1	Organizational details	The organization's countries of operations	Norway	
2-1	Organizational details	Ownership and legal form	SpareBank 1 SMN's organisational set-up	
2-6	Activities and workers	Sector(s) in which the organization is active	This is SpareBank 1 SMN - Subsidiaries	
2-6	Activities and workers	Scope and size of the organization	This is SpareBank 1 SMN - SpareBank 1 SMN's organisational set-up People and organisation	
2-7	Employees	Total number of employees (permanent and temporary) and a breakdown by gender and region	People and organisation	
2-8	Workers who are not employees	Total number of workers who are not employees and whose work is controlled by the organization	People and organisation	
2-6	Activities and workers	Supply chain	Stimulating responsible resource use in our own value and supplier chains	Website: Guidelines for sustainability in procurement
2-6	Activities and workers	Significant changes in sector(s) which the organization is active and other relevant business relationships compared to the previous reporting period	Important events in 2022 - Second quarter 2022	
2-23	Policy Commitments	Policy commitments for responsible business conduct and respect of human rights	Corporate governance	
2-28	Membership associations	Industry associations, other memberships associations, and national or international advocacy organization in which it participates in a significant role	Sustainability and corporate social responsibility - Obligations	See attachment: SpareBank 1 SMN's memberships
Strategy, policies and practices				
2-22	Statement on sustainable development strategy	Statement from the highest governance body or most senior executive of the organization about the relevance of sustainable development and its strategy for contributing to this	Sustainability and corporate social responsibility	Sustainability is an integral part of our group strategy and is incorporated into all business lines and support functions including day-to-day operations, customer offering and distribution of community dividend. Website: Sustainability strategy
2-23	Policy Commitments	Describe the organization's values, principals, standards and norms of behavior	People and organisation	Website: Sustainability policy
2-24	Embedding policy commitments	Describe how policies for responsible business conduct are embedded in the organization's activities and business relationships	Stimulating responsible resource use in our own value and supplier chains	Website: Sustainability policy

2-25	Processes to remediate negative impacts	Describe the organization's commitments and approach has for remediation of negative impacts it has directly or indirectly caused or contributed to	Stimulating responsible resource use in our own value and supplier chains	 Group Impact Analysis 2022
2-26	Mechanisms for seeking advice and raising concerns	Mechanisms for individuals to seek advice on implementing the organization's policies and practices for responsible business conduct, and raise concerns about the organization's business conduct	People and organisation	 Whistleblowing procedure
2-27	Compliance with laws and regulation	Total number of significant instances of non-compliance with laws and regulations during the reporting period, and instance where fines or non-monetary fines were incurred	Corporate governance - point 1	Zero violations, zero fines.

Governance


2-9	Governance structure and composition	Governance structure, including committees of the highest governance body that are responsible for decision-making on and overseeing the management of the organization's impacts on the economy, environment, and people.	Corporate governance	
2-10	Nomination and selection of the highest governance body	Criteria used for nominating and selecting highest governance body members, including whether and how views of stakeholders, diversity, independence and competencies relevant to the impacts of the organization are considered.	Corporate governance - point 7	
2-11	Chair of the highest governance body	Describe whether the chair of the highest governance body is also a senior executive of the organization, and if so, explain their function, the reasons of such an arrangement and how conflicts of interest are prevented and mitigated.	Corporate governance - point 8	
2-12	Role of the highest governance body in overseeing the management of impacts	Describe the role of the highest governance body and its senior executives in developing, approving and updating the organization's purpose, values, mission statement, strategies, policies and goals related to sustainable development.	Ensuring long-term profitability and competitiveness Climate risk- and opportunities	
2-12	Role of the highest governance body in overseeing the management of impacts	Describe the role of the highest governance body in overseeing the organization's due diligence and other processes to identify and manage the organization's impact of the economy, environment, and people		Webpage: Stakeholder dialogue
2-13	Delegation of responsibility for managing impacts	Describe how the highest governance body delegates responsibilities for managing the organization's impacts on economy, environment and people.	Ensuring long-term profitability and competitiveness Climate risk- and opportunities	
2-14	Role of the highest governance body in sustainability reporting	If the highest governance body is responsible reviewing and approving the reported information, describe the process.	Corporate governance	 Representantskapets oppgaver
2-15	Conflict of interest	Processes meant to prevent and mitigate conflicts of interest in the highest governance body.	Corporate governance - point 9	
2-16	Communication of critical concerns	Whether and how critical concerns are communicated to the highest governance body, and the nature and number of critical concerns reported during the reporting period.	Corporate governance - point 10	



2-17	Collective knowledge of the highest governance body	Measures taken to advance the collective knowledge, skills, and experience of the highest governance body on sustainable development.	Ensuring long-term profitability and competitiveness Climate risk- and opportunities	Website: Sustainability policy
2-18	Evaluation of the performance of the highest governance body	Independent and internal processes to evaluate the performance of the highest governance body in overseeing the management of the organization's impact on the economy, environment and people. Describe actions taken in response to the evaluations.	Corporate governance - point 9	
2-19	Remuneration policies	Remuneration policies for members of the highest governance body and senior executives, and how the remuneration policies for relate to their objectives and performance in relation to the management of the organization's impacts on the economy, environment and people	Corporate governance	Webpage: Remuneration and emoluments to senior personell
2-20	Process to determine remuneration	Process for designing its remuneration policies and for determining remuneration	Corporate governance	Webpage: Remuneration and emoluments to senior personell
2-21	Annual total compensation ratio	Ratio of the annual total compensation for the organization's highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual), represented as amount and percentage	Corporate governance	Webpage: Remuneration and emoluments to senior personell

Stakeholder engagement

2-21	Approach to stakeholder engagement	The categories of stakeholders the organization engages with		Webpage: Stakeholder dialogue
2-30	Collective bargaining agreements	Percentage of total employees covered by collective bargaining agreements	People and organisation	
2-29	Approach to stakeholder engagement	Description of how the organization identifies stakeholders	-	Webpage: Stakeholder dialogue
2-29	Approach to stakeholder engagement	Approach to engaging with stakeholders, and how often the organization includes different stakeholders	-	Webpage: Stakeholder dialogue

Reporting practices




2-2a	Entities included in the organization's sustainability reporting	Entities included in its sustainability reporting	SpareBank 1 SMN, SpareBank 1 Regnskapshuset SMN AS, EiendomsMegler 1 Midt-Norge AS, SpareBank 1 Finans Midt-Norge AS, SpareBank 1 Markets AS, SpareBank 1 SMN Invest AS.	
2-2b	Entities included in the organization's sustainability reporting	Specify the differences between the list of entities included in its financial reporting and the list included in its sustainability reporting	No differences	
2-2c	Entities included in the organization's sustainability reporting	Explain the approach used for consolidating information	Material subsidiaries are included in the annual report See "Important events in 2022".	
3-1a	Process to determine material topics	Describe the process the organization has followed to determine its material topics	Global Reporting Initiative 2021.	 Group Materiality Analysis 2022

3-1b	Stakeholders whose views have informed the process of determining material topics	Specify the stakeholders and experts whose views have informed the process of determining its material topics		Webpage: Stakeholder dialogue
3-2	List of materials topics	List the organization's material topics	Sustainability and corporate social responsibility Four focal areas	 Group Materiality Analysis 2022
2-4	Restatements of information	Report restatements of information from previous reporting periods	Reducing the carbon footprint in day-to-day operations and loan portfolios	Webpage: Climate accounting report 2022
3-2	List of materials topics	Report changes to the list of material topics compared to the previous reporting period	Sustainability and corporate social responsibility	 Group Materiality Analysis 2022
2-3	Reporting period, frequency and contact point	Reporting period for, and the frequency of, the organization's sustainability reporting, publication date and contact point for questions about the report	Date of publishing: 07.03.2023 Reporting period: 2022 Reporting frequency: Yearly Contact point: Jan-Eilert Nilsen	E-mail: jan-eilert.nilsen@smn.no
2-5	External assurance	External assurance of the organization's sustainability report	Auditor's report	Website: Auditor's report




SPECIFIC INFORMATION

Focal area 1: Responsible lending and investments




1.1 Preventing and combating economic crime and corruption

3-3	Management of material topics	Description and definition of material topics	Preventing and combating economic crime and corruption	 Group Materiality Analysis 2022
3-3	Management of material topics	Description of policies regarding the material topics	Preventing and combating economic crime and corruption	 Group Materiality Analysis 2022
3-3	Management of material topics	Evaluation of policies and commitments regarding material topics	Preventing and combating economic crime and corruption	 Group Materiality Analysis 2022
404-2	Program for upgrading employee skills	Share of managers and employees who have completed e-learning courses in AML and anti-terrorist financing	Result 2022: 73% Target 2023: 100%	
SMN-1	N/A	Losses due to fraud	Result 2022: NOK 4 234 401 Target 2023: < NOK 10 000 000	




1.2 Ensuring long-term profitability and competitiveness

3-3	Management of material topics	Description and definition of material topics	Ensuring long-term profitability and competitiveness	 Group Materiality Analysis 2022
3-3	Management of material topics	Description of policies regarding the material topics	Ensuring long-term profitability and competitiveness	 Group Materiality Analysis 2022
3-3	Management of material topics	Evaluation of policies and commitments regarding material topics	Ensuring long-term profitability and competitiveness	 Group Materiality Analysis 2022
FS8	N/A	Corporate loan volumes with ESG-score	Result 2022: 11% Target 2023: 75%	
FS8	N/A	Retail loan volumes with ESG-score	Result 2022: 0% Target 2023: 20%	
FS8	N/A	Share of loans that meets the requirements of green bonds	Result 2022: 19,9 % Target 2023: In process	

1.3 Reducing the carbon footprint in day-to-day operations and loan portfolios




3-3	Management of material topics	Description and definition of material topics	Reducing the carbon footprint in day-to-day operations and loan portfolios	 Group Materiality Analysis 2022
3-3	Management of material topics	Description of policies regarding the material topics	Reducing the carbon footprint in day-to-day operations and loan portfolios	 Group Materiality Analysis 2022
3-3	Management of material topics	Evaluation of policies and commitments regarding material topics	Reducing the carbon footprint in day-to-day operations and loan portfolios	 Group Materiality Analysis 2022
305-1	Direct (Scope 1) GHG emissions	Direct (Scope 1) GHG emissions	Reducing the carbon footprint in day-to-day operations and loan portfolios	Webpage: Climate accounting report 2022
305-2	Energy indirect (Scope 2) GHG emissions	Energy indirect (Scope 2) GHG emissions	Reducing the carbon footprint in day-to-day operations and loan portfolios	Webpage: Climate accounting report 2022
305-3	Other indirect (Scope 3) GHG emissions	Other indirect (Scope 3) GHG emissions	Reducing the carbon footprint in day-to-day operations and loan portfolios	Webpage: Climate accounting report 2022
305-5	Reduction of GHG emissions	Reduction of total CO2 emissions from day-to-day-operations	Result 2022: 20 (1000 tCO2e) Target 2023: 16.4 (1000 tCO2e)	Webpage: Climate accounting report 2022
305-5	Reduction of GHG emissions	Reduction of total CO2 emissions from loan portfolios	Result 2022: 1 077 (1000 tCO2e) Target 2023: 1 000 (1000 tCO2e)	Webpage: Climate accounting report 2022

1.4 Stimulating green transition for retail customers and corporate customers

3-3	Management of material topics	Description and definition of material topics	Stimulating green transition for retail customers and corporate customers	 Group Materiality Analysis 2022
3-3	Management of material topics	Description of policies regarding the material topics	Stimulating green transition for retail customers and corporate customers	 Group Materiality Analysis 2022
3-3	Management of material topics	Evaluation of policies and commitments regarding material topics	Stimulating green transition for retail customers and corporate customers	 Group Materiality Analysis 2022
SMN-3	N/A	Share of homes in loan portfolios with energy rating	Result 2022: 51 % Target 2023: 90 %	
SMN-3	N/A	Share of commercial properties in corporate loan portfolio (>1.000m2) with energy rating	Result 2022: Not available Target 2023: 75 %	



Focal area 2: Advisory services and customer offering

2.1 Expanding the commercial offering of climate-friendly and social products and services




3-3	Management of material topics	Description and definition of material topics	Expanding the commercial offering of climate-friendly and social products and services	 Group Materiality Analysis 2022
3-3	Management of material topics	Description of policies regarding the material topics	Expanding the commercial offering of climate-friendly and social products and services	 Group Materiality Analysis 2022
3-3	Management of material topics	Evaluation of policies and commitments regarding material topics	Expanding the commercial offering of climate-friendly and social products and services	 Group Materiality Analysis 2022
FS8	N/A	Sales volume of products and services with an environmental benefit	Result environmental benefit 2022: MNOK 1.003 Result social benefit 2022: NOK 0	

FS7	N/A	Sales volume of products and services with a social benefit	Overall target 2023: MNOK 2 000
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2.2 Strengthening role-based competence-enhancing programmes with a focus on ESG for our own staff

3-3	Management of material topics	Description and definition of material topics	Strengthening role-based competence-enhancing programmes with a focus on ESG for our own staff	 Group Materiality Analysis 2022
3-3	Management of material topics	Description of policies regarding the material topics	Strengthening role-based competence-enhancing programmes with a focus on ESG for our own staff	 Group Materiality Analysis 2022
3-3	Management of material topics	Evaluation of policies and commitments regarding material topics	Strengthening role-based competence-enhancing programmes with a focus on ESG for our own staff	 Group Materiality Analysis 2022
SMN-2	N/A	Category-score for sustainability in Winnin tempo	Result 2022: 7,3 Target 2023: 7.4	

2.3 Maintaining ethical standards




3-3	Management of material topics	Description and definition of material topics	Maintaining ethical standards	 Group Materiality Analysis 2022
3-3	Management of material topics	Description of policies regarding the material topics	Maintaining ethical standards	 Group Materiality Analysis 2022
3-3	Management of material topics	Evaluation of policies and commitments regarding material topics	Maintaining ethical standards	 Group Materiality Analysis 2022
404-2a	Program for upgrading employee skills	Share of managers and employees who have completed e-learning course in ethics	Result 2022: 92 % Target 2023: 100 %	
404-2b	Program for upgrading employee skills	Assistance for employees who intend to retire, resigning or change work tasks	Frequency of employees resigning, retiring or changing work tasks doesn't occur beyond what is perceived as normal, and assistance to such transitions are not described in further detail	

2.4 Complying with requirements and obligations on the processing of personal data




2.7. Complying with requirements and obligations on the processing of personal data				
3-3	Management of material topics	Description and definition of material topics	Complying with requirements and obligations on the processing of personal data	 Group Materiality Analysis 2022
3-3	Management of material topics	Description of policies regarding the material topics	Complying with requirements and obligations on the processing of personal data	 Group Materiality Analysis 2022
3-3	Management of material topics	Evaluation of policies and commitments regarding material topics	Complying with requirements and obligations on the processing of personal data	 Group Materiality Analysis 2022
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	No. of documented complaints of breaches of data privacy or loss of customer data	Result 2022: 3 Target 2023: 0	

Focal area 3: Sustainable transition of Mid-Norway

3.1 Stimulating innovation and sustainable economic growth




3-3	Management of material topics	Description and definition of material topics	Stimulating innovation and sustainable economic growth	 Group Materiality Analysis 2022
3-3	Management of material topics	Description of policies regarding the material topics	Stimulating innovation and sustainable economic growth	 Group Materiality Analysis 2022
3-3	Management of material topics	Evaluation of policies and commitments regarding material topics	Stimulating innovation and sustainable economic growth	 Group Materiality Analysis 2022
413-1	Operations with local community engagement, impact assessments, and development programs	No. of participants in meeting places and innovation activities led by SpareBank 1 SMN	Result 2022: 0 stk Target 2023: 7 000 participants and 250 'youth enterprises'	
413-1	Operations with local community engagement, impact assessments, and development programs	No. of participants in competence- and development programmes led by SpareBank 1 SMN	Result 2022: 31 Target 2023: 50-100	

3.2 Helping to strengthen transition efforts in businesses in Mid-Norway




3-3	Management of material topics	Description and definition of material topics	Helping to strengthen transition efforts in businesses in Mid-Norway	 Group Materiality Analysis 2022
3-3	Management of material topics	Description of policies regarding the material topics	Helping to strengthen transition efforts in businesses in Mid-Norway	 Group Materiality Analysis 2022
3-3	Management of material topics	Evaluation of policies and commitments regarding material topics	Helping to strengthen transition efforts in businesses in Mid-Norway	 Group Materiality Analysis 2022
SMN-3	N/A	Share of large corporate customers with credit engagements who has carbon accounting reports	Result 2022: Not available Target 2023: 25%	

Focal area 4: Sustainable transition in SpareBank 1 SMN

4.1 Stimulating responsible resource use in our own value and supplier chains




3-3	Management of material topics	Description and definition of material topics	Stimulating responsible resource use in our own value and supplier chains	 Group Materiality Analysis 2022
3-3	Management of material topics	Description of policies regarding the material topics	Stimulating responsible resource use in our own value and supplier chains	 Group Materiality Analysis 2022
3-3	Management of material topics	Evaluation of policies and commitments regarding material topics	Stimulating responsible resource use in our own value and supplier chains	 Group Materiality Analysis 2022
SMN-4	N/A	Share of the Group's material procurement (> NOK 100 000) from suppliers with carbon accounting reports	Result 2022: Not available Target 2023: 50 %	

4.2 Strengthening data and cybersecurity

3-3	Management of material topics	Description and definition of material topics	Strengthening data and cybersecurity	 Group Materiality Analysis 2022
3-3	Management of material topics	Description of policies regarding the material topics	Strengthening data and cybersecurity	 Group Materiality Analysis 2022
3-3	Management of material topics	Evaluation of policies and commitments regarding material topics	Strengthening data and cybersecurity	 Group Materiality Analysis 2022

404-2	Program for upgrading employee skills	Share of managers and employees who have completed digital learning courses in cyber security	Result 2022: 93,2 % Target 2023: 100 %
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4.3 Promoting diversity, inclusion and equality

3-3	Management of material topics	Description and definition of material topics	Promoting diversity, inclusion and equality	 Group Materiality Analysis 2022
3-3	Management of material topics	Description of policies regarding the material topics	Promoting diversity, inclusion and equality	 Group Materiality Analysis 2022
3-3	Management of material topics	Evaluation of policies and commitments regarding material topics	Promoting diversity, inclusion and equality	 Group Materiality Analysis 2022
SMN-5	N/A	Minimum category-score Winningtemp on diversity, inclusion and equality: 8	Result 2022: 7,6 Target 2023: 8	



To the Board of Directors of Sparebank 1 SMN

Independent statement regarding Sparebank 1 SMN's sustainability reporting

We have undertaken a limited assurance engagement on Sparebank 1 SMN's GRI Index for 2022 and of key performance indicators for sustainability (sustainability reporting) at 31 December 2022. Our statement provides limited assurance.

Sparebank 1 SMN's GRI index for 2022 is an overview of which sustainability topics Sparebank 1 SMN considers material to its business and which key performance indicators Sparebank 1 SMN uses to measure and report its sustainability performance, together with a reference to where material sustainability information is reported. Sparebank 1 SMN's GRI Index for 2022 is available and included in Attachment to Sparebank 1 SMN's annual report for the year 2022. We have examined whether Sparebank 1 SMN has provided a GRI Index for 2022 and whether mandatory disclosures are presented according to the Standards published by the Global Reporting Initiative (www.globalreporting.org/standards) (criteria).

Sparebank 1 SMN uses key performance indicators for sustainability to measure and control their sustainability results. The key performance indicators are available and included in Sparebank 1 SMN's annual report for the period ending 31 December 2022. The indicators that have been subject to our limited assurance procedures are "Results 2022" included in "Table 1: Focal areas with Key Performance Indicators" in the chapter "Sustainability and corporate social responsibility", the tables under heading "Staffing" in the chapter "People and organization", and column "Reporting period (2022)" in table "Carbon Accounting Report" for both Sparebank 1 SMN Parent Bank and the Group included in Attachment to the Annual Report. Sparebank 1 SMN has defined their key performance indicators and explained how they are measured in notes to the tables that are available and included in the chapters "Sustainability and corporate social responsibility", "People and organization" and in Attachment "Energy- and climate accounts SpareBank 1 SMN" and "Energy- and climate accounts SpareBank 1 SMN Group" (criteria).

Management's responsibility

Management is responsible for Sparebank 1 SMN's sustainability reporting and for ensuring that it is prepared in accordance with criteria as described above. The responsibility includes designing, implementing and maintaining an internal control that ensures the development and reporting of the GRI Index and key performance indicators for sustainability.

Our independence and quality control

We are independent of the company in accordance with the law and regulations applicable, and the International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code), and we have fulfilled our ethical obligations in accordance with these requirements. We use ISQM 1 - Quality management for audit firms that perform audits and simplified audit of accounts as well as other certification assignments and related services and maintain a comprehensive system of quality control including documented guidelines and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory claims.

Auditor's responsibilities



Our task is to express a limited assurance conclusion on Sparebank 1 SMN's sustainability reporting based on the procedures we have performed and the evidence we have obtained. We conducted our work in accordance with the Standard on Assurance Engagements ISAE 3000: "Assurance engagements other than audits or review of historical financial information". A limited assurance engagement in accordance with ISAE 3000 involves assessing the suitability in the circumstances of management's use of the Criteria as the basis for the preparation of the sustainability reporting, assessing the risks of material misstatement of the sustainability reporting whether due to fraud or error, responding to the assessed risks as necessary in the circumstances, and evaluating the overall presentation of the sustainability reporting. A limited assurance engagement is substantially less in scope than a reasonable assurance engagement in relation to both the risk assessment procedures, including an understanding of internal control, and the procedures performed in response to the assessed risks.

The procedures we performed were based on our professional judgment and, among others, included an assessment of whether the criteria used are appropriate, as well as an assessment of the overall presentation of the sustainability reporting. Our procedures include meetings with representatives from Sparebank 1 SMN who are responsible for the material sustainability topics covered by the sustainability reporting; review of internal control and routines for reporting key performance indicators for sustainability; obtaining and reviewing relevant information that supports the preparation of key performance indicators for sustainability; assessment of completeness and accuracy of selected key performance indicators for sustainability; and controlling the calculations of key performance indicators for sustainability based on an assessment of the risk of error.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had we performed a reasonable assurance engagement. Accordingly, we do not express a reasonable assurance opinion about whether the sustainability reporting has been prepared, in all material respects, in accordance with the Criteria.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Conclusion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that

Sparebank 1 SMN's GRI Index for 2022 is not, in all material respects, developed and presented in accordance with the requirements of the Standards published by The Global Reporting Initiative; and

Sparebank 1 SMN's key performance indicators are not, in all material aspects, developed, measured and reported in accordance with the definitions and explanations provided in relation to each table containing the key performance indicators in chapters "Bærekraft", "Mennesker og organisasjon" and in Appendix "Energi- og klimaregnskap Sparebank 1 SMN" and "Energi- og klimaregnskap konsernet" .

Trondheim, 2 March 2023

PricewaterhouseCoopers AS

Rune Kenneth S. Lædre
State Authorized Public Accountant.

Note: This translation from Norwegian has been prepared for information purposes only.

SpareBank 1 SMN's memberships

ACI Norge
Agritech Cluster
Arti7 bedriftsnettverk Trondheim
Aukra næringsforum
Den norske advokatforening
Den norske dataforening
Econa
Eiendom Norge
Finans Norge
Finansieringsselskapenes Forening
Fosnavåg shippingklubb
Framtiden i Våre Hender
Framtidslåben Ålesund
Frøya Handelsstand
Frøya nye næringsforening
Frøya Næringsforum
Førde industri- og næringssamskipnad
Haram næring- og innovasjonsforum
Hitra Næringsforening
HR Norge
Hustadvika næringsforum
Håndverkerforeningen i Trondheim
ICC Norge
iKuben Molde
Industrinavet Verdal
Innherred Næringsforening
InnoCamp Steinkjer
KID Næringslivs nettverket
Knytte bedriftsnettverk Trondheim
Kommunikasjonsforeningen
Kristiansund og Nordmøre næringsforum
Kvinner i Finans charteret
Lean forum Midt-Norge
Lean forum Nordvest
Maritimt forum Nordvest
Midsund næringsforum
Miljøfyrtårn
Molde Næringsforum
Molde sentrum
Namdal Næringsforening
Namdalskysten Næringsforening
Namsos næringsforening
NCE Finance Innovation
NCE Finance Innovation
NCE ikuben Molde
Newton-rom (via selskapet First Scandinavia)
NiTr Fosen
NiTr Malvik
NiTr Melhus
NiTr Midtre Gauldal
Nordic arena nettverk Møre AS

Nordic Future Innovation AS
Norges Eiendomsmeglerforbund
Norsk institutt for styremedlemmer
Norsk kommunikasjonsforening
Norsk nettverk for næringseiendom
Norsk Petroleumsforening
Norske Finansanalytikerens Forening
NorwAI
NTNU Partnerskap Innovasjon og verdiskaping
Næringsforeningen i Trondheimsregionen
Næringsforeningen i Værnesregionen
Næringsforeningen i Ålesundsregionen
Næringslivets sikkerhetsråd
Oppdal Næringsforening
Orkland næringsforening
Partnership for Carbon Accounting Financials (PCAF)
ProtoMore Molde
Rauma næringslag
Regnskap Norge
Renergy
Rennebu næringsforening
Romsdal reiseliv
Samarbeidsgruppen Midtbyen Trondheim
Shippingklubben Ålesund
Skift - næringslivets klimaledere
Skogmo Industripark Overhalla
Sparebankforeningen
Startuplab Fintech Industriprogram
Steinkjer næringsforum
Sunndal næringsforening
Surnadal næringsforening
Sykkylven industri- og næringslag
Thams Klyngen Orkanger
todalen.no
Trollheimsporten AS
Trondheim markedsforening
Trondheim Tech Port (Tidligere Technoport)
Trøndelag HR-forum
Trøndersk matfestival
UN Global Compact Norge
UNEPFIs Principles for Responsible Banking
Ungt Entreprenørskap
United Nations (USCH5)
Verdipapirforetakenes forbund
Verdipapirforetakenes forening
Vestnes næringsforum
Vestnes sentrumsforening
Visit Nordmøre og Romsdal
Ørland næringsforum
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