

# GRI Index

The table shows SpareBank 1 SMN's reporting for 2023 with reference to the GRI Universal Standards 2021.

GRI-indicator	Indicator - name	Indicator - description	Response in annual report	Source
<b>GENERAL INFORMATION</b>				
<b>Organizational profile</b>				
2-1	Organizational details	Name of the organization	SpareBank 1 SMN	
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	Detaljer om organisasjonen	Ownership and legal form	SpareBank 1 SMN's organizational set-up	
2-6	Activities and workers	Activities, product and services provided by the organization	This is SpareBank 1 SMN Subsidiaries	
2-6	Activities and workers	Beskrivelse av de bransje og marked organisasjonen opererer i	This is SpareBank 1 SMN Subsidiaries	
2-6	Activities and workers	Sector(s) in which the organization is active	This is SpareBank 1 SMN SpareBank 1 SMN's organizational set-up	
2-6	Activities and workers	Description of the organization's supply chain	People and organisation Stimulating responsible resource use in our own value and supplier chains	 Website: Guidelines for sustainability in procurement chains
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 2023	
2-7	Employees	Total number of employees (permanent and temporary) and a breakdown by gender and region	People and organization Staffing	
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 organization Organization Staffing	
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 Our obligations	See attachment: SpareBank 1 SMN's memberships
<b>Strategy, policies and practices</b>				
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.
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	Webpage: 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 Organization	Webiste: 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 governances 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 interested 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 organizations'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	Nettside: 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	Communcation 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, environmen	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
2-30	Collective bargaining agreements	Percentage of total employees covered by collective bargaining agreements	People and organisation Staffing	

### Stakeholder engagement

2-21	Approach to stakeholder engagement	The categories of stakeholders the organization engages with	-	 Webpage: Stakeholder dialogue
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".	

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: 29.02.2024 Reporting period: 2023 Reporting frequency: Yearly Contact point: Jan-Eilert Nilsen	 E-mail: jan-eilert.nilsen@smn.no
2-4	Restatements of information	Report restatements of information from previous reporting periods		 Webpage: Climate accounting report 2023
2-5	External assurance	External assurance of the organization's sustainability report	Auditor's report	 Website: Auditor's report
3-1a	Process to determine material topics	Describe the process the organization has followed to determine its material topics	Global Reporting Initiative 2021.	 Webpage: 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	Our sustainability work Our focal areas	 Webpage: Group Materiality Analysis 2022
3-2	List of materials topics	Report changes to the list of material topics compared to the previous reporting period	Our sustainability work Our focal areas	 Webpage: Group Materiality Analysis 2022

## 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	 Webpage: Group Materiality Analysis 2022
3-3	Management of material topics	Description of policies regarding the material topics	Preventing and combating economic crime and corruption	 Webpage: 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	 Webpage: Group Materiality Analysis 2022
404-2a	Program for upgrading employee skills	Share of managers and employees who have completed e-learning courses in AML and anti-terrorist financing	Target 2023: 100 % Result 2023: 97 % Target 2024: 100 %	
SMN-1	N/A	Losses due to fraud	Target 2023: < 10.000.000 NOK Result 2023: 15.660.000 NOK Target 2024: < 22.500.000 NOK	

#### 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	Webpage: Group Materiality Analysis 2022
3-3	Management of material topics	Description of policies regarding the material topics	Ensuring long-term profitability and competitiveness	Webpage: Group Materiality Analysis 2022
3-3	Management of material topics	Evaluation of policies and commitments regarding material topics	Ensuring long-term profitability and competitiveness	Webpage: Group Materiality Analysis 2022
FS8	N/A	Corporate loan volumes with ESG-score	Target 2023: 75 % Result 2023: 87 % Target 2024: 90 %	
FS8	N/A	Retail loan volumes with ESG-score	Target 2023: 20 % Result 2023: 0 % Target 2024: 20 %	
FS8	N/A	Share of loans that meets the requirements of green bonds	Target 2023: Under development Result 2023: 19.1 % Target 2024: Under development	

#### 1.3 Reducing the carbon footprint in loan portfolios

3-3	Management of material topics	Description and definition of material topics	Reducing the carbon footprint in loan portfolios	 Webpage: Group Materiality Analysis 2022
3-3	Management of material topics	Description of policies regarding the material topics	Reducing the carbon footprint in loan portfolios	 Webpage: Group Materiality Analysis 2022
3-3	Management of material topics	Evaluation of policies and commitments regarding material topics	Reducing the carbon footprint in loan portfolios	 Webpage: Group Materiality Analysis 2022
305-1	Direct (Scope 1) GHG emissions	Direct (Scope 1) GHG emissions	Reducing the carbon footprint in loan portfolios	Webpage: Climate accounting report 2023
305-2	Energy indirect (Scope 2) GHG emissions	Energy indirect (Scope 2) GHG emissions	Reducing the carbon footprint in loan portfolios	 Webpage: Climate accounting report 2023
305-3	Other indirect (Scope 3) GHG emissions	Other indirect (Scope 3) GHG emissions	Reducing the carbon footprint in loan portfolios	 Webpage: Climate accounting report 2023
305-5	Reduction of GHG emissions	Total CO2 emissions from loan portfolios	Target 2023: 1.000 (1000 tCO2e) Result 2023: 1.034 (1000 tCO2e) Target 2024: SBTi	 Webpage: Climate accounting report 2023

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#### 1.4 Stimulating green transition for customers

3-3	Management of material topics	Description and definition of material topics	Stimulating green transition for retail customers and corporate customers	 Webpage: 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	 Webpage: 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	 Webpage: Group Materiality Analysis 2022
SMN-3	N/A	Share of homes in loan portfolios with energy rating	Target 2023: 90 % Result 2023: 42 % Target 2024: 70 %	
SMN-3	N/A	Share of commercial properties in corporate loan portfolio (>1.000m2) with energy rating	Target 2023: 75 % Result 2023: 21 % Target 2024: 90 % of new exposures	

#### 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	 Webpage: 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	 Webpage: 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	 Webpage: Group Materiality Analysis 2022
FS8	N/A	Sales volume of products and services with an environmental benefit	Overall target 2023: 2.000.000.000 NOK Overall result 2023: 2.516.000.000 NOK Overall target 2024: 3.000.000.000 NOK	
FS7	N/A	Sales volume of products and services with a social benefit		

##### 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	 Webpage: 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	 Webpage: 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	 Webpage: Group Materiality Analysis 2022
SMN-2	N/A	Category-score for sustainability in Winningtemp	Target 2023: 7,4 Result 2023: 7,3 Target 2024: 8	

### 2.3 Maintaining ethical standards

3-3	Management of material topics	Description and definition of material topics	Maintaining ethical standards	 Webpage: Group Materiality Analysis 2022
3-3	Management of material topics	Description of policies regarding the material topics	Maintaining ethical standards	 Webpage: Group Materiality Analysis 2022
3-3	Management of material topics	Evaluation of policies and commitments regarding material topics	Maintaining ethical standards	 Webpage: Group Materiality Analysis 2022
404-2a	Program for upgrading employee skills	Share of managers and employees who have completed e-learning course in ethics	Target 2023: 100 % Result 2023: 94 % Target 2024: 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

3-3	Management of material topics	Description and definition of material topics	Complying with requirements and obligations on the processing of personal data	 Webpage: 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	 Webpage: 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	 Webpage: 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	Target 2023: 0 Result 2023: 12 Target 2024: 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	 Webpage: Group Materiality Analysis 2022
3-3	Management of material topics	Description of policies regarding the material topics	Stimulating innovation and sustainable economic growth	 Webpage: Group Materiality Analysis 2022
3-3	Management of material topics	Evaluation of policies and commitments regarding material topics	Stimulating innovation and sustainable economic growth	 Webpage: 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	Target 2023: 7.000 participants and 250 entrepreneur- and youth enterprises Result 2023: 5.790 participants and 300 entrepreneur- and youth enterprises Target 2024: 6.000 participants and 250 entrepreneur- and 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	Target 2023: 50-100 Result 2023: 270 Target 2024: 500

### 3.2 Helping to strengthen transition efforts in small and medium-size businesses

3-3	Management of material topics	Description and definition of material topics	Helping to strengthen transition efforts in small and medium-size businesses	 Webpage: Group Materiality Analysis 2022
3-3	Management of material topics	Description of policies regarding the material topics	Helping to strengthen transition efforts in small and medium-size businesses	 Webpage: Group Materiality Analysis 2022
3-3	Management of material topics	Evaluation of policies and commitments regarding material topics	Helping to strengthen transition efforts in small and medium-size businesses	 Webpage: Group Materiality Analysis 2022
SMN-3	N/A	Share of large corporate customers with credit engagements who has carbon accounting reports	Target 2023: 25 % Result 2023: 24 % Target 2024: 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	 Webpage: 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	 Webpage: 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	 Webpage: Group Materiality Analysis 2022
SMN-4	N/A	Share of the Group's material procurement (> NOK 100 000) from suppliers with carbon accounting reports	Target 2023: 50 % Result 2023: 68 % Target 2024: 80 %	

#### 4.2 Strengthening data and cybersecurity

3-3	Management of material topics	Description and definition of material topics	Strengthening data and cybersecurity	 Webpage: Group Materiality Analysis 2022
3-3	Management of material topics	Description of policies regarding the material topics	Strengthening data and cybersecurity	 Webpage: Group Materiality Analysis 2022
3-3	Management of material topics	Evaluation of policies and commitments regarding material topics	Strengthening data and cybersecurity	 Webpage: Group Materiality Analysis 2022
404-2a	Program for upgrading employee skills	Share of managers and employees who have completed digital learning courses in cyber security	Target 2023: 100 % Result 2023: 90 % Target 2024: 100 %	

#### 4.3 Promoting diversity, inclusion and equality

3-3	Management of material topics	Description and definition of material topics	Promoting diversity, inclusion and equality	 Webpage: Group Materiality Analysis 2022
3-3	Management of material topics	Description of policies regarding the material topics	Promoting diversity, inclusion and equality	 Webpage: Group Materiality Analysis 2022
3-3	Management of material topics	Evaluation of policies and commitments regarding material topics	Promoting diversity, inclusion and equality	 Webpage: Group Materiality Analysis 2022
SMN-5	N/A	Minimum category-score Winningtemp on diversity, inclusion and equality: 8	Target 2023: I/A Result 2023: I/A Target 2024: I/A	

#### 4.4 Reducing the carbon footprint in day-to-day operations

3-3	Management of material topics	Description and definition of material topics	Reducing the carbon footprint in day-to-day operations	 Webpage: 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	 Webpage: 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	 Webpage: 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	 Webpage: Climate accounting report 2023
305-2	Energy indirect (Scope 2) GHG emissions	Energy indirect (Scope 2) GHG emissions	Reducing the carbon footprint in day-to-day operations	 Webpage: Climate accounting report 2023
305-3	Other indirect (Scope 3) GHG emissions	Other indirect (Scope 3) GHG emissions	Reducing the carbon footprint in day-to-day operations	 Webpage: Climate accounting report 2023
305-5	Reduction of GHG emissions	Total CO2 emissions from day-to-day operations	Target 2023: 16,4 (1000 tCO2e) Result 2023: 18,5 (1000 tCO2e) Target 2024: SBTi	 Webpage: Climate accounting report 2023