

# Spar Nord Bank

# Policy for a responsible working environment



## 1. Vision and viewpoint

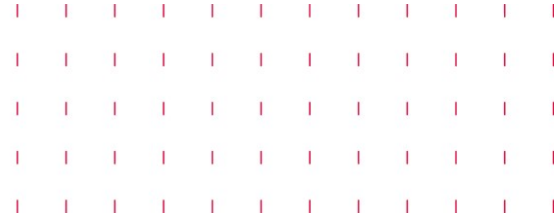
Spar Nord Bank's vision is to provide a healthy and safe environment for all employees, customers and visitors at the Bank. Thus, a fundamental element of our commitment to being a proper bank is that we focus strongly on health, physical and psychological safety and wellbeing for everyone working at Spar Nord Bank and that we maintain a good and safe environment for everyone who frequents the bank.

This requires ongoing dialogue across the bank in order to understand and comply with safety, health and well-being needs, systematic monitoring and follow-up on risks, incidents and improvement opportunities as well as ongoing communication and training in a responsible working environment. Finally, it is important to ensure continued management support and sufficient resources.

## 2. Purpose and objectives

With implementation of the policy and the actions arising from the policy, we want to ensure that all employees have the required conditions to carry out their work appropriately in terms of safety and health. Therefore, we want to ensure that:

- we have the lowest possible absenteeism due to sickness
- we prevent fatigue and wear-out, accidents at work, absenteeism, poor mental wellbeing and discrimination



- we are resilient to all types of bullying and harassment, including physical, verbal, sexual or psychological bullying and harassment, abuse and threatening behaviour
- we achieve a high degree of respect, equality, health and wellbeing for all

We comply with legislation, and in selected areas our initiatives go beyond what is required by legislation.

An important part of our work is to ensure that all employees are familiar with the policy for a responsible working environment, and the possibilities and rights that follow from this. The policy is implemented through the Spar Nord Bank area committees and the health and safety organisation, and everyone with formal managerial responsibility at Spar Nord Bank is an ambassador for the policy and helps to maintain and improve the physical and psychological working environment for employees.

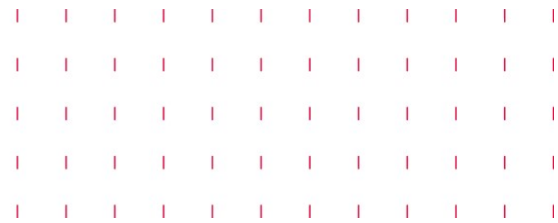
### **3. Principles for implementation of the policy in practice**

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In order to ensure that the policy for a responsible working environment is realised in practice, it is important that we have the right organisation, and that there are effective systems and procedures to continuously help monitor, register and act on incidents, risks and improvement opportunities with regard to the working environment at Spar Nord Bank.

Specifically, this means that we:

- maintain a well-functioning health and safety organisation that actively helps to implement the working environment policy,
- encourage dialogue between employees and management about the working environment and improvements therein,
- provide the necessary tools and managerial resources to ensure a healthy physical and psychological working environment,
- will be transparent for our employees, customers and the outside world with regard to our working environment results, risks and improvement opportunities,
- will engage our employees in creating a safe and healthy working environment through training , campaigns, competitions, etc.
- always comply with relevant legislation, and also consider and respect leading standards, conventions and principles for human rights and labour rights.



## 4. Actions in the period 2020 to 2025

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- Regular new initiatives, ideas and knowledge about a healthy and responsible working environment.
- Constant focus on a healthy culture regarding breaks and physical activity during working hours.
- Focus on information for new employees about the Bank's ambitions for a healthy working environment.
- A pre-retirement policy has been drawn up which describes the options we offer older employees.
- Prevention of employee fatigue and wear-out and work for attractive conditions for older employees.

## 5. Key indicators

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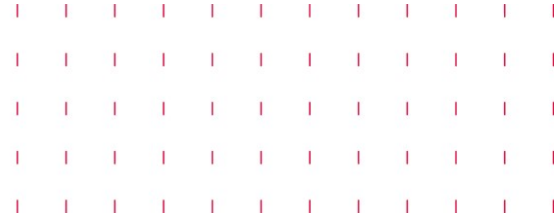
To follow up on compliance with the policy and the status of focus areas, we monitor the following important indicators:

- Sickness absence
- Number of physical injuries and types of injury
- Number of registered incidents of bullying, offence, and harassment
- Number of registered cases of stress
- Number of registered cases of discrimination
- Number of registered incidents of violence and threatening behaviour
- Employee wellbeing

## 6. Follow-up, reporting and communication

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Follow-up on compliance with the policy is through visits from the health and safety organisation, as well as regular wellbeing measurements and interviews with employees. In the event that follow-up procedures identify factors that are not in accordance with the desired conditions, HR and others responsible for policy areas will implement closer follow-up in the relevant departments. Actions in direct contravention of the policy may have consequences for employment.



We intend to make work on the working environment, as well as the results, visible to employees and, when relevant, also to customers and the outside world. Furthermore, our ambition is for managers, area committees and the health and safety organisation at Spar Nord Bank to be ambassadors for the policy throughout the bank.

Therefore, we will communicate efforts and results through the following channels:

- The annual ESG report and regularly on the bank's website.
- In meetings with customers when relevant or requested.
- Internally via the Spar Nord Bank intranet and other information channels, including our Facebook page for employees, *Tættere På*.
- Via Spar Nord Bank's annual health and wellbeing weeks.
- Incidents that concern the physical working environment should be reported to an immediate manager or directly to Sikkerhed@sparnord.dk. They will then be processed by the working environment committee.
- Incidents that concern psychosocial working conditions should be reported to an immediate manager or directly to the HR director. They will then be processed by the liaison committee (SU).

## 7. Responsibility and organisation

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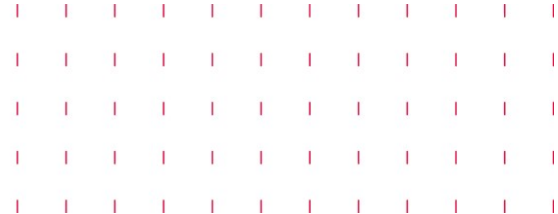
The Executive Board is responsible for implementation and compliance with the policy.

In order to ensure effective implementation and compliance with the policy, the Executive Board will ensure that clear and well documented procedures are established to ensure that employees at all levels are familiar with the policy and comply with it. Similarly, the Executive Board will ensure that employees are aware of any updates to the policy.

The Executive Board will ensure that, as part of the onboarding process, new employees at the bank are familiar with the policy and that checks are carried out to ensure compliance with the policy by employees at all levels. The Executive Board will report at least once a year to the Board of Directors of Spar Nord Bank on implementation and compliance with the policy.

The following are responsible for the Spar Nord Bank policy for a responsible working environment and can be contacted regarding questions, interest and reports:

- In the Executive Management: John Lundsgaard
- Routine queries and primary contact persons: Kristian Jørgensen and Kim Kastrupsen
- Steering committee: ESG Steering Committee
- Organisational placement: HR
- Reporting and data: HR supporter Jette Otvald Jensen
- Responsible for updating the policy: Kim Kastrupsen



## 8. Coupling to international principles and conventions

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The Spar Nord Bank policy for a responsible working environment has been drawn up with respect for the following internationally recognised principles, standards and conventions:

- UN Global Compact
- UN Guiding Principles on Business and Human Rights
- ILO Conventions
- UNEP FI Principles for Responsible Banking
- UN Sustainable Development Goals.

## 9. Coupling to the UN Sustainable Development Goals

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Spar Nord Bank recognises the UN Sustainable Development Goals Spar Nord Bank's policy for, and work on, a responsible working environment contributes to the following UN Sustainable Development Goals and targets:



### **Goal 4: Quality education**

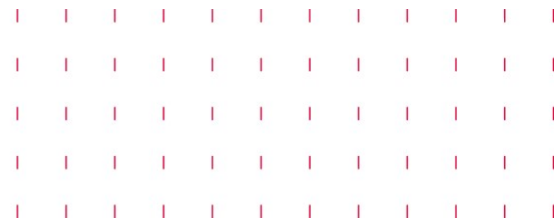
Goal: Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all

### **Goal 5: Gender equality**

Goal: Achieve gender equality and empower all women and girls.

### **Goal 8: Decent work and economic growth**

Goal: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.



## 10. Updates

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The Spar Nord Bank policy for a responsible working environment is regularly reviewed and updated as necessary, although at least once a year. If a review results in an update of the policy, it is ensured that all relevant employees are informed about the update and what it is about.

*This policy has been approved by the Executive Board, December 2023.*