

# Responsible working environment policy of Spar Nord Bank A/S



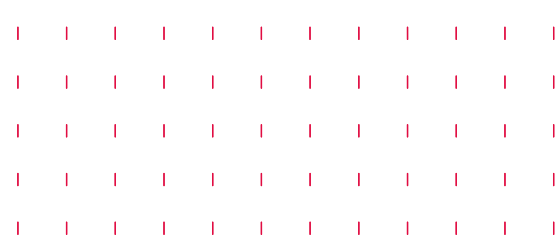
## 1. Vision and strategy

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Spar Nord's vision is to provide a healthy and safe environment to all employees, customers and visitors to 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 well-being for everyone working at Spar Nord and that we maintain a good and safe environment for everyone who frequents the Bank.

This requires, among other things, ongoing dialogue across the Bank to understand and accommodate the needs for safety, health and well-being, systematic monitoring and follow-up on risks, incidents and potential for improvement as well as ongoing communication and training regarding a responsible working environment. Lastly, it is important to ensure continued support from management and adequate resources.



## 2. Objectives and targets

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With the implementation of this policy and the initiatives originating from the policy, we want to ensure that all employees have the required prerequisites for performing their work fully adequately in terms of safety and health. We want to ensure that:

- we have the lowest possible level of absence due to illness,
- we prevent attrition, occupational accidents, absenteeism, mental dissatisfaction and discrimination,
- we are resistant to all types of bullying and harassment, including physical, verbal, sexual or psychological bullying and harassment, abuse and threats, and
- we obtain a high degree of respect, equality, health and well-being for everyone.

Generally, we expect that the working environment initiatives at Spar Nord go beyond what is prescribed by law and that the initiatives are continuously developed and improved.

An important part of our efforts is to ensure that all employees are familiar with the responsible working environment policy and the opportunities and rights it brings. The policy is implemented via Spar Nord's departmental committees and the working environment organisation, and everybody with formal managerial responsibility at Spar Nord will act as ambassadors for the policy and contribute to continuously maintaining and improving the physical and psychological working environment for the employees.

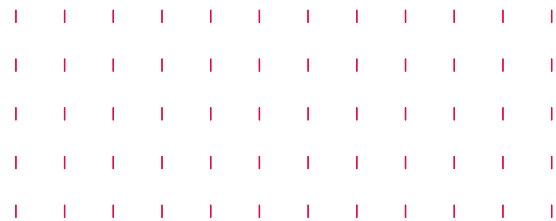
## 3. Principles for implementing the policy in practice

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To ensure that the responsible working environment policy is implemented in practice, it is important that we have the right organisation and that we have effective systems and procedures that continuously help us monitor, register and act on incidents, risks and any areas for improvement in relation to the working environment at Spar Nord.

More specifically, this means that we:

- maintain a well-functioning working environment organisation, contributing actively to implementing the working environment policy,
- motivate the employees and management to engage in dialogue about the working environment and any improvements thereof,
- provide the tools and managerial resources required to secure healthy physical and psychological working environment conditions,
- are transparent towards our employees, customers and society at large in relation to our working environment performance, risks and areas for improvement,
- encourage our employees to help create a healthy and safe working environment by way of training, campaigns, competitions, etc., and
- always comply with applicable legislation and address and respect leading standards, conventions and principles in the areas of human rights and labour rights.



## 4. Initiatives in the period 2020-25

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- Ongoing initiatives, ideas and knowledge about a healthy and responsible working environment.
- Maintaining focus on encouraging employees to take breaks and engage in physical activities during working hours.
- Focusing on new employees' knowledge of the Bank's wish to provide a healthy working environment.
- Preparing a senior policy that will describe the options for our senior members of staff.
- Avoiding attrition of our employees by way of preventive measures and at the same time working with attractive senior terms.

## 5. Key performance indicators

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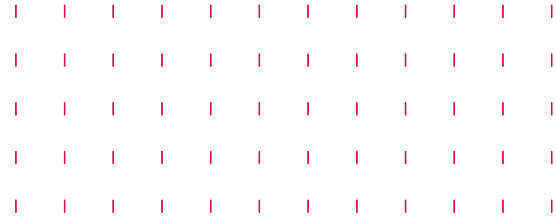
To follow up on compliance with the policy and obtain a status on the focus area, we regularly monitor the following important indicators:

- Absence due to illness
- Number of physical injuries and types of injury
- Number of registered incidents related to bullying, insults and harassment
- Number of registered cases of stress
- Number of registered cases of discrimination
- Number of registered robberies (number of employees affected)
- Number of registered incidents related to violence and threats
- Employee satisfaction
- Annual physical workplace assessments

## 6. Follow-up, reporting and communication

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Follow-up on compliance with the policy takes place on an ongoing basis by way of visits from the working environment organisation as well as regular satisfaction surveys and talks with the employees. If the follow-up reveals any issues that do not comply with the desired conditions, HR and the other responsible persons for the areas of the policy will ensure a closer follow-up of the affected departments. Any actions directly inconsistent with the policy may have employment-related consequences.



The intention is for the work with a responsible working environment and the results achieved to be visible to the employees and, where relevant, also to customers and society at large. Moreover, the ambition is that Spar Nord's managers, departmental committees and working environment organisation will act as ambassadors for the policy throughout the Bank.

For that purpose, we will communicate about our initiatives and performance via the following channels:

- In the annual ESG report and regularly on the Bank's website
- In connection with customer meetings, when relevant and requested
- Internally via Spar Nord's intranet and other information channels, including via the Danish Facebook group "Tættere på" for employees
- Via Spar Nord's annual health and well-being week
- Incidents related to the physical working environment will be reported to the immediate superior or directly to the head of Facility Management. Subsequently, such incidents will be considered by the Working Environment Committee.
- Incidents related to the psychological working environment will be reported to the immediate superior or directly to the head of HR. Subsequently, such incidents will be considered by the Cooperation Committee.

## 7. Responsibility and organisation

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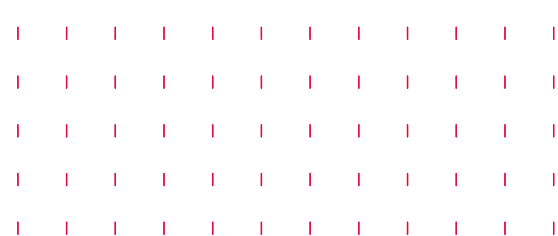
The Executive Board must ensure that the policy is implemented and complied with.

To ensure the policy is effectively implemented and complied with, the Executive Board must verify that clear, unambiguous and well-documented procedures are in place to ensure that employees at all levels are familiar with and comply with the policy. In the same way, the Executive Board ensures that employees are informed about any policy updates, see below.

The Executive Board must ensure that, on being employed, the Bank's employees are informed about the policy, and the Executive Board must ensure that employees at all levels comply with the policy. The Executive Board reports at least once annually to the Board of Directors of Spar Nord on implementation of and compliance with this policy across the Bank.

The following persons are responsible for Spar Nord's responsible working environment policy and may be contacted in case of questions, interest and reporting:

- Responsible person on the Executive Board: John Lundsgaard
- Day-to-day responsible persons and primary contact persons: Lea Magnusson and Kim Kastrupsen
- Steering group: ESG steering group
- Organisational responsibility: Facility Management
- Reporting and data: HR supporter Jette Otvald Jensen
- Responsible for updating the policy: Kim Kastrupsen and Lea Magnusson



## 8. Link to international principles and conventions

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Spar Nord's responsible working environment policy is drafted with due 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. Link to the UN Sustainable Development Goals

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Spar Nord recognises the UN Sustainable Development Goals (SDGs). Spar Nord's policy on and involvement in a responsible working environment contribute to the following SDGs and sub-targets:



### Goal 4: Quality education

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

### Goal 5: Gender equality

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

### Goal 8: Decent work and economic growth

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

## 10. Updating

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Spar Nord's responsible working environment policy is reviewed and updated as and when needed, but at least once a year. If a review results in an update of the policy, all relevant employees will be informed about the update and its contents.