



Principles for
Responsible Banking

Reporting and Self-Assessment Template



Principles for Responsible Banking



Principle 1: Alignment



We will align our business strategy to be consistent with and contribute to individuals' needs and society's goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement and relevant national and regional frameworks.

Business model

Describe (high-level) your bank's business model, including the main customer segments served, types of products and services provided, the main sectors and types of activities across the main geographies in which your bank operates or provides products and services. Please also quantify the information by disclosing e.g. the distribution of your bank's portfolio (%) in terms of geographies, segments (i.e. by balance sheet and/or off-balance sheet) or by disclosing the number of customers and clients served.

Response

Eika Gruppen is a financial services group operating solely in Norway. The Eika Alliance comprises approx. 50 local banks, Eika Gruppen and Eika Boligkreditt. Eika Gruppen's core business is delivering products and services to the local banks in the alliance and their customers. Our operations are split between the delivery of shared services, operational support and development to the banks and other companies in the alliance on the one hand, and the insurance, financing and payments, saving and investment, and estate agency business areas on the other.

Eika Gruppen's vision is to strengthen the local bank by being Norway's most attractive partner for independent local banks. This is founded on a commitment to securing strong and caring local banks which serve as a driving force for the growth and development of customers and of the local community and provides guidelines for Eika Gruppen's core business. Eika Gruppen will facilitate a modern and cost-effective ecosystem which gives the alliance banks access to a competitive and forward-looking technology platform, expertise, products and services able to strengthen their competitiveness.

Links and references

See Annual report 2023 side 6 (Norwegian)
<https://eika.no/eika-alliansen/arsrapporter>

Eika Gruppen comprises parent company Eika Gruppen AS and wholly owned subsidiaries Eika Forsikring AS, Eika Kreditbank AS, Eika Kapitalforvaltning AS and Aktiv Eiendomsmegling AS. Eika Forsikring has announced a merger with Fremtind which is planned to be completed by Q3 2024, pending approval from the Norwegian Competition Authority.

In 2023, retail lending constituted approx. 80 % and business lending constituted approx. 20 % of the Alliance banks total lending. The business customer segment consists mainly of small and mediums sized enterprises (SME). The main sectors are real estate, construction and agriculture, which together constitute approx. 83 % of the alliance banks total business lending.

Strategy alignment

Does your corporate strategy identify and reflect sustainability as strategic priority/ies for your bank?

- Yes
 No

Please describe how your bank has aligned and/or is planning to align its strategy to be consistent with the Sustainable Development Goals (SDGs), the Paris Climate Agreement, and relevant national and regional frameworks.

Does your bank also reference any of the following frameworks or sustainability regulatory reporting requirements in its strategic priorities or policies to implement these?

- UN Guiding Principles on Business and Human Rights
 International Labour Organization fundamental conventions
 UN Global Compact
 UN Declaration on the Rights of Indigenous Peoples
 Any applicable regulatory reporting requirements on environmental risk assessments, e.g. on climate risk - please specify which ones: **TCFD**
 Any applicable regulatory reporting requirements on social risk assessments, e.g. on modern slavery - please specify which ones: **Norwegian Transparency Act**
 None of the above

Response

The financial industry plays an important role in the transition to a more sustainable development, both locally, nationally and globally. As part of the Eika Alliansen, a significant part of our footprint is through the alliance banks. Eika Gruppen’s corporate strategy clearly states that sustainability is one of our major priorities. The corporate strategy is in the process of being renewed due to, among others, changes in our corporate structure. The updated corporate strategy is expected to be finalized by the end of 2024.

Our sustainability strategy, updated 2023, is aligned with our overall strategy. It is put in place to ensure that the necessary considerations for sustainability are being maintained throughout the organisation. The sustainability strategy is based on, among others, the Sustainable Development Goals and the Paris Climate Agreement. The strategy states that Eika Gruppen has an ambition of becoming net zero by 2050, consistent with the Paris Agreement.

Our policy for sustainability references important frameworks and initiatives which we rely on in our work, including ILO fundamental conventions, UN’s Sustainable Development Goals (SDG) and UN Global Compact. The policy further identifies six of the SDGs where our impact may be significant. These are:

- 5 Gender Equality
- 8 Decent Work and Economic Growth
- 11 Sustainable Cities and Communities
- 12 Responsible Consumption and Production
- 13 Climate Action and
- 17 Partnerships for the Goals.

Eika Gruppen supports the Task Force on Climate-related Financial Disclosures (TCFD), and report yearly based on these recommendations. We also report on social risk assessments in accordance with Norwegian law, hereby the Norwegian Transparency Act – “åpenhetsloven” and the Norwegian Equality and Anti-Discrimination Act (ARP).

Links and references:

*See our webpage:
<https://eika.no/eika-alliansen/eikagruppen/baer-ekraft> and
<https://eika.no/eika-alliansen/eikagruppen/baer-ekraft/baerekraftsmaal>
(Norwegian)*

*See Annual report 2023
page 18 (Norwegian)
<https://eika.no/eika-alliansen/arsrapporter>*

*See Annual report 2023
page 27 (Norwegian)*

In addition of being a signatory of the Principles for Responsible Banking (UNEP FI), Eika Gruppen has also signed the Principles for Responsible Investments (UN PRI), are certified Eco-Lighthouse, have signed Guide against Greenwashing and Women in Finance Charter.

Principle 2: Impact and Target Setting



We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products and services. To this end, we will set and publish targets where we can have the most significant impacts.

2.1 Impact Analysis (Key Step 1)

Show that your bank has performed an impact analysis of its portfolio/s to identify its most significant impact areas and determine priority areas for target-setting. The impact analysis shall be updated regularly¹ and fulfil the following requirements/elements (a-d)²:

- a) Scope:** What is the scope of your bank's impact analysis? Please describe which parts of the bank's core business areas, products/services across the main geographies that the bank operates in (as described under 1.1) have been considered in the impact analysis. Please also describe which areas have not yet been included, and why.

Response

In 2021, Eika Gruppen conducted an impact analysis using the impact analysis tool developed by UNEP FI. A report presenting the procedures and findings was published in December 2021.

The analysis was conducted on behalf of both Eika Gruppen and the alliance banks, since a significant part of our impact is through the banks. The analysis was conducted for consumer and business banking. We applied information about all relevant products in Eika Gruppen and through the alliance banks for all relevant customers.

Links and references

See Annual report 2023 page 17 (Norwegian)
<https://eika.no/eika-alliansen/arsrapporter>

¹ That means that where the initial impact analysis has been carried out in a previous period, the information should be updated accordingly, the scope expanded as well as the quality of the impact analysis improved over time.

² Further guidance can be found in the [Interactive Guidance on impact analysis and target setting](#).

<p><i>For consumer banking, which constituted approx. 81 % of the alliance's lending in 2021, the applied products and services are certificate of deposits, consumer credit, current account, home loans, non-life insurance other specialized credits, pension funding, savings account, trusts, funds and similar financial entities and vehicle related loans.</i></p> <p><i>For business banking, which constituted approx. 19 % of the Alliance's lending, approx. 75 % of the Alliance's total lending to businesses was included.</i></p> <p><i>Eika Gruppen solely operates in Norway. Investment banking and asset management are not relevant for the Eika Alliance.</i></p>	<p>See our webpage: https://eika.no/eika-alliansen/eikagruppen/baereraft (in Norwegian, English summary) and Impact analysis 2021 (Norwegian)</p>
<p>b) Portfolio composition: Has your bank considered the composition of its portfolio (in %) in the analysis? Please provide proportional composition of your portfolio globally and per geographical scope</p> <p>i) by sectors & industries³ for business, corporate and investment banking portfolios (i.e. sector exposure or industry breakdown in %), and/or</p> <p>ii) by products & services and by types of customers for consumer and retail banking portfolios.</p> <p>If your bank has taken another approach to determine the bank's scale of exposure, please elaborate, to show how you have considered where the bank's core business/major activities lie in terms of industries or sectors.</p>	
<p>Response</p> <p><i>Since the Eika Alliance solely operates in Norway, we have not divided our portfolio based on geography.</i></p> <p>i) <i>For business banking, the lendig portfolio has been divided by sector aligned with ISIC/NACE codes, according to the PRB Excel tool. The main sectors were real estate activities with own or leases property, constructions of buildings, raising of cattle, real estate activities on a fee or contract basis and growing of cereals. Since this regards the banks' aggregated data, we do not wish to share the percentage sector exposure.</i></p> <p>ii) <i>For consumer banking, the main products and services are savings account, current accounts, consumer credit, non-life insurance, home loans and funds.</i></p>	<p>Links and references</p> <p>See Annual report 2023 page 17 (Norwegian) https://eika.no/eika-alliansen/arsrapporter</p> <p>See our webpage: https://eika.no/eika-alliansen/eikagruppen/baereraft (in Norwegian, English summary)</p>

³ 'Key sectors' relative to different impact areas, i.e. those sectors whose positive and negative impacts are particularly strong, are particularly relevant here.

c) Context: What are the main challenges and priorities related to sustainable development in the main countries/regions in which your bank and/or your clients operate?⁴ Please describe how these have been considered, including what stakeholders you have engaged to help inform this element of the impact analysis.

This step aims to put your bank's portfolio impacts into the context of society's needs.

Response

The Eika Alliance is solely present in Norway. To understand the main challenges and priorities related to sustainable development in Norway, we conducted in 2021 the analysis in the PRB excel tool for assessing country needs. This was done in collaboration with several of the Alliance Banks. In a later step, we evaluated whether we had an impact on these country needs.

In the ongoing process of updating our materiality analysis, we consulted several stakeholders autumn 2023. We had in-depth discussions with several stakeholder groups, including representatives from the alliance banks (our owners), Finance Norway and representatives for own employees. During 2021, we consulted both employees and customers through surveys regarding sustainability, and in 2022 we conducted a broader analysis of how we can help our consumer customers with sustainability.

Links and references

See Annual report 2023 page 17 (Norwegian)
<https://eika.no/eika-alliansen/arsrapporter>

See Annual report page 16 (Norwegian)

Based on these first 3 elements of an impact analysis, what positive and negative impact areas has your bank identified? Which (at least two) significant impact areas did you prioritize to pursue your target setting strategy (see 2.2)⁵? Please disclose.

Response

Based on the first three steps, the analysis showed that we had the greatest potential positive effect on the following country needs:

Consumer banking: Inclusive healthy economics, employment and housing

Business banking: Inclusive healthy economics, housing and food

The analysis further showed that we had the greatest potential negative effect on:

Consumer banking: Inclusive healthy economics, waste and resource efficiency/security

Business banking: Resource efficiency, waste and climate.

Links and references

See [Impact analysis 2021](#) (Norwegian)

See Annual report 2023 page 17 (Norwegian)
<https://eika.no/eika-alliansen/arsrapporter>

⁴ Global priorities might alternatively be considered for banks with highly diversified and international portfolios.

⁵ To prioritize the areas of most significant impact, a qualitative overlay to the quantitative analysis as described in a), b) and c) will be important, e.g. through stakeholder engagement and further geographic contextualisation.

The impact areas that according to our completed analysis should be prioritized, are:

- *Resource efficiency*
- *Waste*
- *Climate*

After processing the insights from the analysis, together with other insight and knowledge about impact, we have prioritized the following three topics for our sustainability work:

- *To strengthen the local banks as driving forces for sustainable growth and development.
Our greatest impact on sustainable development is through the alliance banks. By strengthening the banks work on sustainability, we can contribute to reduce negative impact and strengthen positive impact. We want to contribute positively through bankrelated systems and services, tools for customer interaction, acquisitions, knowledge and insights.*
- *To be a driving force for climate and nature-friendly valuecreation
The world is experiencing a climate and nature crisis. As a finance institution, we have great possibilities – and responsibilities – to work for a better future. Through the shaping of our products and service, and securing a responsible value chain, we can reduce emissions and other negative impact on nature.*
- *A diverse and inclusive Eika
People are different and they have different needs. Traditionally, the finance industry has been homogenous. Eika Gruppen respects and support international human rights and the need to promote decent work, including diversity and inclusion – both in our own corporation and in the society around us through our products and services.*

See Annual report 2023 page 18 (Norwegian)

<https://eika.no/eika-alliansen/arsrapporter>

d) *For these (min. two prioritized impact areas): Performance measurement. Has your bank identified which sectors & industries as well as types of customers financed or invested in are causing the strongest actual positive or negative impacts? Please describe how you assessed the performance of these, using appropriate indicators related to significant impact areas that apply to your bank's context.*

In determining priority areas for target-setting among its areas of most significant impact, you should consider the bank's current performance levels, i.e. qualitative and/or quantitative indicators and/or proxies of the social, economic and environmental impacts

resulting from the bank's activities and provision of products and services. If you have identified climate and/or financial health&inclusion as your most significant impact areas, please also refer to the applicable indicators in the [Annex](#).

If your bank has taken another approach to assess the intensity of impact resulting from the bank's activities and provision of products and services, please describe this.

The outcome of this step will then also provide the baseline (incl. indicators) you can use for setting targets in two areas of most significant impact.

Response

Eika Gruppen has chosen to have relevant indicators in all the product companies. Based on the impact analysis and other relevant insights and knowledge, each company in Eika Gruppen has identified the appropriate indicators related to significant impact areas.

Eika Gruppen cannot chose indicators for the alliance banks. However, for the banks participating in the doble materiality project, Eika Gruppen plan to assist them finding relevant indicators and data for the material topics which the banks have in common. For business banking the heavy-emitting sectors are not (or nearly not) represented in the banks' portfolios.

We know that financed emissions will be of importance to both Eika Gruppen and the alliance banks. In 2022 and 2023, we participated in Finance Norway's working group for making a guidance paper on how to calculate financed emissions in Norway. We have also stated the ambition of becoming net zero by 2050 in Eika Gruppen's portfolios. We are working with calculating financed emissions in our own product companies

In 2023, we assisted the alliance banks with excel tools which they can use to calculate financed emissions. We have also fascilitated a voluntary doble materiality analysis project during autumn 2023, in order to assist the banks with further knowledge about the impact from their activities. Spring 2024, we will facilitate another voluntary project for the alliance banks, which will look deeper into the topics that were found material in the 2023 project.

Links and references

See [Impact analysis 2021](#) (Norwegian)

See Annual report 2023 page 16 (Norwegian)

<https://eika.no/eika-alliansen/arsrapporter>

Guidance for calculating financed emissions:
<https://www.finansnorge.no/si-teassets/dokumenter/maler-og-veiledere/guidance-for-calculating-financed-emissions.pdf>

Self-assessment summary:

Which of the following components of impact analysis has your bank completed, in order to identify the areas in which your bank has its most significant (potential) positive and negative impacts?⁶

- | | | | |
|--------------------------|-----------------------------------------|-------------------------------------------------|-----------------------------|
| Scope: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> In progress | <input type="checkbox"/> No |
| Portfolio composition: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> In progress | <input type="checkbox"/> No |
| Context: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> In progress | <input type="checkbox"/> No |
| Performance measurement: | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> In progress | <input type="checkbox"/> No |

Which most significant impact areas have you identified for your bank, as a result of the impact analysis?

Climate, resource efficiency and waste.

How recent is the data used for and disclosed in the impact analysis?

- Up to 6 months prior to publication
- Up to 12 months prior to publication
- Up to 18 months prior to publication
- Longer than 18 months prior to publication

Open text field to describe potential challenges, aspects not covered by the above etc.: *(optional)*

⁶ You can respond "Yes" to a question if you have completed one of the described steps, e.g. the initial impact analysis has been carried out, a pilot has been conducted.

2.2 Target Setting (Key Step 2)

Show that your bank has set and published a minimum of two targets which address at least two different areas of most significant impact that you identified in your impact analysis.

The targets have to be Specific, Measurable (qualitative or quantitative), Achievable, Relevant and Time-bound (SMART). Please disclose the following elements of target setting (a-d), for each target separately:

a) Alignment: which international, regional or national policy frameworks to align your bank's portfolio with⁷ have you identified as relevant? Show that the selected indicators and targets are linked to and drive alignment with and greater contribution to appropriate Sustainable Development Goals, the goals of the Paris Agreement, and other relevant international, national or regional frameworks.

You can build upon the context items under 2.1.

Response

Eika Gruppen has also set three major targets addressing our most significant impact (as discussed in 2.1.c), based on insights from our impact analysis. These are:

- *To strengthen the local banks as driving forces for sustainable growth and development (SDG 8 and 13, among others). We have set internal target to address this.*
- *Driving force for climate and nature-friendly value creation (SDG 12 and 13). We have set different targets to address this. Eika Gruppen has a long term ambition of achieving net zero emissions from our activities by 2050, which is in line with the Paris agreement and the expectations of the Norwegian authorities. We will in 2024 start to make a roadmap for this ambition. By nature-friendly, the ambition is to respect the planetary boundaries, thus taking the three significant impact areas climate, waste and resource efficiency into account.*
- *A diverse and inclusive Eika (SDG 5): There is an ongoing project for diversity and inclusion. Targets and indicators will await fulfillment of this project.*

The two first targets are linked to the areas of most significant impact according to the impact analysis (climate, waste, resource efficiency).

Links and references

See [Impact analysis 2021](#) (Norwegian)

b) Baseline: Have you determined a baseline for selected indicators and assessed the current level of alignment? Please disclose the indicators used as well as the year of the baseline.

You can build upon the performance measurement undertaken in 2.1 to determine the baseline for your target.

A package of indicators has been developed for climate change mitigation and financial health & inclusion to guide and support banks in their target setting and implementation journey. The overview of indicators can be found in the [Annex](#) of this template.

If your bank has prioritized climate mitigation and/or financial health & inclusion as (one of) your most significant impact areas, it is strongly recommended to report on the indicators in the Annex, using an overview table like below including the impact area, all relevant indicators and the corresponding indicator codes:

<i>Impact area</i>	<i>Indicator code</i>	<i>Response</i>
<i>Climate change mitigation</i>	...	
	...	
	...	

<i>Impact area</i>	<i>Indicator code</i>	<i>Response</i>
<i>Financial health & inclusion</i>	...	
	...	
	...	

In case you have identified other and/or additional indicators as relevant to determine the baseline and assess the level of alignment towards impact driven targets, please disclose these.

Response

Eika Gruppen is in a process of conducting our double materiality analysis (CSRD). In light of the findings, we will adjust our indicators accordingly, including baseline.

Some of the relevant indicators from the appendix are A.1.1 Climate strategy, A.1.2 Paris alignment target, A2.2. .

Links and references

⁷ Your bank should consider the main challenges and priorities in terms of sustainable development in your main country/ies of operation for the purpose of setting targets. These can be found in National Development Plans and strategies, international goals such as the SDGs or the Paris Climate Agreement, and regional frameworks. Aligning means there should be a clear link between the bank's targets and these frameworks and priorities, therefore showing how the target supports and drives contributions to the national and global goals.

<p>c) <u>SMART targets</u> (incl. key performance indicators (KPIs)⁸): Please disclose the targets for your first and your second area of most significant impact, if already in place (as well as further impact areas, if in place). Which KPIs are you using to monitor progress towards reaching the target? Please disclose.</p>	
<p><i>Response</i> This step awaits fulfillment of our double materiality analysis.</p>	<p><i>Links and references</i></p>
<p>d) <u>Action plan:</u> which actions including milestones have you defined to meet the set targets? Please describe.</p> <p>Please also show that your bank has analysed and acknowledged significant (potential) indirect impacts of the set targets within the impact area or on other impact areas and that it has set out relevant actions to avoid, mitigate, or compensate potential negative impacts.</p>	
<p><i>Response</i> This step awaits fulfillment of our double materiality analysis</p>	<p><i>Links and references</i></p>

<p>Self-assessment summary</p> <p>Which of the following components of target setting in line with the PRB requirements has your bank completed or is currently in a process of assessing for your...</p>			
	<p>... first area of most significant impact: ... CLIMATE</p>	<p>... second areas of most significant impact: RESOURCE EFFICIENCY and WASTE</p>	<p>third area of impact: DIVERSITY AND INCLUSION</p>

⁸ Key Performance Indicators are chosen indicators by the bank for the purpose of monitoring progress towards targets.

Alignment	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No
Baseline	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> In progress <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> In progress <input type="checkbox"/> No
SMART targets	<input type="checkbox"/> Yes <input type="checkbox"/> In progress <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> In progress <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> In progress <input checked="" type="checkbox"/> No
Action plan	<input type="checkbox"/> Yes <input type="checkbox"/> In progress <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> In progress <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> In progress <input checked="" type="checkbox"/> No

2.3 Target implementation and monitoring (Key Step 2)

For each target separately:

Show that your bank has implemented the actions it had previously defined to meet the set target.

Report on your bank's progress since the last report towards achieving each of the set targets and the impact your progress resulted in, using the indicators and KPIs to monitor progress you have defined under 2.2.

Or, in case of changes to implementation plans (relevant for 2nd and subsequent reports only): describe the potential changes (changes to priority impact areas, changes to indicators, acceleration/review of targets, introduction of new milestones or revisions of action plans) and explain why those changes have become necessary.

Response

The plan for implementation of the targets will be worked out together with the target setting.

We already have a process in place for target monitoring regarding sustainability, with quarterly internal reporting and monthly follow-up conversations with the product companies.

Links and references

*See Annual report 2023
page 19 (Norwegian)
[https://eika.no/eika-
alliansen/arsrapporter](https://eika.no/eika-alliansen/arsrapporter)*

Principle 3: Clients and Customers



We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.

3.1 Client engagement

Does your bank have a policy or engagement process with clients and customers⁹ in place to encourage sustainable practices?

Yes In progress No

Does your bank have a policy for sectors in which you have identified the highest (potential) negative impacts?

Yes In progress No

Describe how your bank has worked with and/or is planning to work with its clients and customers to encourage sustainable practices and enable sustainable economic activities¹⁰). It should include information on relevant policies, actions planned/implemented to support clients' transition, selected indicators on client engagement and, where possible, the impacts achieved.

This should be based on and in line with the impact analysis, target-setting and action plans put in place by the bank (see P2).

Eika Gruppen's customers are mainly the alliance banks, in addition to some direct customers from our product companies. We do not have policies for sectors with the highest potential impact, since we are not exposed for such sectors.

Through the alliance banks

Eika Gruppen's greatest impact on sustainable development is through the alliance banks. We have several channels for dialogue with the alliance banks. Based on insight from the impact analysis and other studies, in addition to the banks' knowledge and experiences, we strive to shape our services in order to encourage sustainable development.

The alliance banks have strong traditions of quality customer care and holistic advisory – a great base in order to encourage sustainable practices. In the following, we will therefore describe how we work to encourage sustainable practices with the banks' customers.

- *Together with some of the alliance banks, we have in 2023 been working on a new method for bringing sustainability into the advisory meetings with corporate customers. The tool was launched in February 2024.*
- *In 2023, our product company Eika Kapitalforvaltning, has been working on – and launched – new guidelines to the banks for how to get to know the customers' sustainability preferences, in line with SFDR.*
- *An analysis of the banks' customers' knowledge of sustainability in 2022, showed that the alliance's customers wanted advice in order to make more sustainable choices. Based on the insight from the analysis, we conducted a sustainability week directed to the customers in January 2023. The aim was to increase their knowledge of sustainability without marketing our own products. One of the key topics was how to reduce energy use.*
- *Eika Gruppen offers free sustainability courses for the banks' advisors.*

We do not put in place policies for the banks.

Within Eika Gruppen:

- *Eika Forsikring posts articles with information on how to prevent damages*
- *Eika Kapitalforvaltning uses an illustration of acorns in order to inform the customers of the different funds' sustainability ranking from Morningstar (eikenøtter)*
- *Eika Kredittbank strives to learn the customers how to use the right type of financing, and encourages the customers to use unsecured loans to refinance or renovate*
- *Focus on ensuring a more heterogeneous representation in our communication and market material*

⁹ A client engagement process is a process of supporting clients towards transitioning their business models in line with sustainability goals by strategically accompanying them through a variety of customer relationship channels.

¹⁰ Sustainable economic activities promote the transition to a low-carbon, more resource-efficient and sustainable economy.

3.2 Business opportunities

Describe what strategic business opportunities in relation to the increase of positive and the reduction of negative impacts your bank has identified and/or how you have worked on these in the reporting period. Provide information on existing products and services, information on sustainable products developed in terms of value (USD or local currency) and/or as a % of your portfolio, and which SDGs or impact areas you are striving to make a positive impact on (e.g. green mortgages – climate, social bonds – financial inclusion, etc.).

Response

The alliance banks want to be a valued sparring partner for their customers, also when it comes to sustainability matters. Products Eika Gruppen has put in place to encourage sustainable practices and sustainable economic activities include:

- *Green car loans - climate, which accounted for 44 % av the amount of car loans (2023)*
- *Green mortgages – climate (product for the banks)*

Services that Eika Gruppen has put in place to encourage sustainable practices and sustainable economic activities include:

- *A tool for ESG-assessment in credit proceedings for the corporate market*
- *Policy for ESG for our liquidity portfolios owned by the alliance banks – which is included by most of the alliance banks*

Links and references

Principle 4: Stakeholders



We will proactively and responsibly consult, engage and partner with relevant stakeholders to achieve society's goals.

4.1 Stakeholder identification and consultation

Does your bank have a process to identify and regularly consult, engage, collaborate and partner with stakeholders (or stakeholder groups¹¹) you have identified as relevant in relation to the impact analysis and target setting process?

Yes In progress No

Please describe which stakeholders (or groups/types of stakeholders) you have identified, consulted, engaged, collaborated or partnered with for the purpose of implementing the Principles and improving your bank's impacts. This should include a high-level overview of how your bank has identified relevant stakeholders, what issues were addressed/results achieved and how they fed into the action planning process.

Response

Eika Gruppen has worked out a thoroughly stakeholder analysis in 2021, which was presented to both the management and the corporate board. The stakeholder analysis was updated autumn 2023, and is presented in our annual report. Our main stakeholder groups are the alliance banks, customers, coworkers, authorities, partners, investors, the local communities and society in general – including the planetary boundaries. Our stakeholder analysis is a result of collaboration between the companies in Eika Gruppen.

Links and references

See Annual report 2023 page 16 (Norwegian)
<https://eika.no/eika-alliansen/arsrapporter>

¹¹ Such as regulators, investors, governments, suppliers, customers and clients, academia, civil society institutions, communities, representatives of indigenous population and non-profit organizations

Eika Gruppen has extensive contact through various channels with important stakeholder groups, especially with the alliance banks. The banks also ensures that important topics from their own customers and local communities are being looked after. Some of the banks are also represented in the corporate board.

In order to conduct our sustainability work, we strive to ensure a good dialogue for all major stakeholder groups. During 2021, we consulted employees and customers through different surveys regarding sustainability. In 2022, we also conducted a broader analysis of our customers' perception of sustainability, with the resultat that we conducted a sustainability week for the banks' customer in order to increase their knowledge on how to be more sustainable in their everyday life. In 2023, as part of our ongoing doble materiality analysis, we have had structured in-depth discussion with representatives from our own workforce, Finance Norway and representatives for the alliance banks. The main purpose was to increase our insights into sustainability topics of importance to these groups.

Principle 5: Governance & Culture



We will implement our commitment to these Principles through effective governance and a culture of responsible banking

5.1 Governance Structure for Implementation of the Principles

Does your bank have a governance system in place that incorporates the PRB?

Yes In progress No

Please describe the relevant governance structures, policies and procedures your bank has in place/is planning to put in place to manage significant positive and negative (potential) impacts and support the effective implementation of the Principles. This includes information about

- which committee has responsibility over the sustainability strategy as well as targets approval and monitoring (including information about the highest level of governance the PRB is subjected to),
- details about the chair of the committee and the process and frequency for the board having oversight of PRB implementation (including remedial action in the event of targets or milestones not being achieved or unexpected negative impacts being detected), as well as
- remuneration practices linked to sustainability targets.

Response

Eika Gruppen has made adjustments in relevant governance structure in the previous years to have resources for sustainability in all relevant fields.

As stated in our Policy for Sustainability, the Corporate Board is the highest level of responsibility for Eika Gruppen's work on sustainability. The Board sets targets and framework for sustainability in Eika Gruppen.

Within our established governance structure, EVP Bank Governance and Reporting is responsible for leading and coordinating the sustainability work, thus including overseeing the implementation of the Principles. The EVP Bank Governance and Reporting shall, on a yearly basis, present the work that has been done on sustainability to the Eika Gruppen's management and to the Board.

Links and references

See Annual report 2023 page 19 (Norwegian)
<https://eika.no/eika-alliansen/arsrapporter>

See policy for sustainability page 5 (Norwegian)
<https://www.eika.no/eika-alliansen/eikagruppen/baerakraft>

The bank has established a sustainability team with representatives from all product companies. This team works with relevant analysis, development of policies and strategies and reporting, including implementation of the PRB. The sustainability team reports on the progress of sustainability indicators for each product company every quarter to EVP Bank Governance and Reporting, who then reports yearly to Eika Gruppen's management and to the Board.

We do not have any remuneration practices in Eika Gruppen linked to sustainability targets. Eika Kapitalforvaltning is the only company in Eika Gruppen with a scheme for variable remuneration.

5.2 Promoting a culture of responsible banking:

Describe the initiatives and measures of your bank to foster a culture of responsible banking among its employees (e.g., capacity building, e-learning, sustainability trainings for client-facing roles, inclusion in remuneration structures and performance management and leadership communication, amongst others).

Response

Eika Gruppen has worked with increasing co-workers' knowledge of sustainability, both internal in the organization and throughout the alliance.

Initiatives put in place to foster a culture of responsible banking among our employees:

- Employees with sustainability focus in all product areas (insurance, financing and payments, saving and investment, and estate agency business)*
- Sustainability week in 2020, 2021 and 2022*
- Eco-lighthouse certification of all locations*
- Free sustainability courses for all employees*
- Yearly presentation of our climate accounting to our employees*

Eika Gruppen has Ethical Guidelines for our employees to follow.

Links and references

5.3 Policies and due diligence processes

Does your bank have policies in place that address environmental and social risks within your portfolio?¹² Please describe.

Please describe what due diligence processes your bank has installed to identify and manage environmental and social risks associated with your portfolio. This can include aspects such as identification of significant/salient risks, environmental and social risks mitigation and definition of action plans, monitoring and reporting on risks and any existing grievance mechanism, as well as the governance structures you have in place to oversee these risks.

Response

In our corporate risk policies, there are requirements that ESG-risk shall be assessed.

Eika Gruppen has a due diligence procedure for acquisitions, where any contracts with increased ESG-risk will have to be approved by the board together with action plans to reduce the risk.

For the alliance banks, we have created a tool for ESG-assessment in credit processes for the corporate market.

Links and references

Self-assessment summary

Does the CEO or other C-suite officers have regular oversight over the implementation of the Principles through the bank's governance system?

Yes No

Does the governance system entail structures to oversee PRB implementation (e.g. incl. impact analysis and target setting, actions to achieve these targets and processes of remedial action in the event targets/milestones are not achieved or unexpected neg. impacts are detected)?

Yes No

Does your bank have measures in place to promote a culture of sustainability among employees (as described in 5.2)?

Yes In progress No

¹² Applicable examples of types of policies are: exclusion policies for certain sectors/activities; zero-deforestation policies; zero-tolerance policies; gender-related policies; social due diligence policies; stakeholder engagement policies; whistle-blower policies etc., or any applicable national guidelines related to social risks.

Principle 6: Transparency & Accountability



We will periodically review our individual and collective implementation of these Principles and be transparent about and accountable for our positive and negative impacts and our contribution to society's goals.

6.1 Assurance

Has this publicly disclosed information on your PRB commitments been assured by an independent assurer?

Yes Partially No

If applicable, please include the link or description of the assurance statement.

Response

Eika Gruppen's report on our PRB commitments has been subject for limited assurance by Deloitte. Deloitte also audits Eika Gruppen's financial statement.

Links and references

6.2 Reporting on other frameworks

Does your bank disclose sustainability information in any of the listed below standards and frameworks?

- GRI
- SASB
- CDP
- IFRS Sustainability Disclosure Standards (to be published)
- TCFD
- Other:

Response

In our yearly annual report, Eika Gruppen reports based on the recommendations of the TCFD.

Links and references

	<p>See Annual report 2023 page 16 (Norwegian) https://eika.no/eika-alliansen/arsrapporter</p>
<h3>6.3 Outlook</h3> <p>What are the next steps your bank will undertake in next 12 month-reporting period (particularly on impact analysis¹³, target setting¹⁴ and governance structure for implementing the PRB)? Please describe briefly.</p>	
<p><i>Response</i></p> <p>In 2024, Eika Gruppen will focus on the double materiality analysis with reference to CSRD. The material topics will provide a basis for which areas we will strengthen our work on further, including target setting, KPIs and action plans.</p> <p>With basis in our impact analysis, we plan to develop a roadmap on how to achieve our net-zero ambition, which should be aligned with the Paris Agreement. In the same line, Eika Gruppen will also continue our project with the alliance banks on conducting materiality analysis and support the banks in their need of developing relevant indicators and data for material topics.</p>	<p><i>Links and references</i></p> <p>See Annual report 2023 page 17 (Norwegian) https://eika.no/eika-alliansen/arsrapporter</p>

6.4 Challenges

¹³ For example outlining plans for increasing the scope by including areas that have not yet been covered, or planned steps in terms of portfolio composition, context and performance measurement

¹⁴ For example outlining plans for baseline measurement, developing targets for (more) impact areas, setting interim targets, developing action plans etc.

Here is a short section to find out about challenges your bank is possibly facing regarding the implementation of the Principles for Responsible Banking. Your feedback will be helpful to contextualise the collective progress of PRB signatory banks.

What challenges have you prioritized to address when implementing the Principles for Responsible Banking? Please choose what you consider the top three challenges your bank has prioritized to address in the last 12 months (optional question).

If desired, you can elaborate on challenges and how you are tackling these:

- | | |
|------------------------------------------------------------------------------------------------|----------------------------------------------------------|
| <input type="checkbox"/> Embedding PRB oversight into governance | <input type="checkbox"/> Customer engagement |
| <input type="checkbox"/> Gaining or maintaining momentum in the bank | <input type="checkbox"/> Stakeholder engagement |
| <input type="checkbox"/> Getting started: where to start and what to focus on in the beginning | <input checked="" type="checkbox"/> Data availability |
| <input type="checkbox"/> Conducting an impact analysis | <input checked="" type="checkbox"/> Data quality |
| <input type="checkbox"/> Assessing negative environmental and social impacts | <input type="checkbox"/> Access to resources |
| <input checked="" type="checkbox"/> Choosing the right performance measurement methodology/ies | <input type="checkbox"/> Reporting |
| <input checked="" type="checkbox"/> Setting targets | <input type="checkbox"/> Assurance |
| <input type="checkbox"/> Other: ... | <input type="checkbox"/> Prioritizing actions internally |

If desired, you can elaborate on challenges and how you are tackling these:

Annex

A set of indicators has been produced for the impact areas of climate mitigation and financial health & inclusion. These indicators will support you in your reporting and in showing progress against PRB implementation. Banks are expected to set targets that address minimum two areas of most significant impact within the first four years after signing the PRB. That means that Banks should ultimately set targets using impact indicators. Acknowledging the fact that banks are in different stages of implementation and on different levels of maturity and therefore might not be able to report on impact from the beginning, a Theory of Change approach has been used to develop the set of indicators below.¹⁵ The Theory of Change shows the **pathway to impact** and considers the relationship between inputs, actions, outputs, and outcomes in order to achieve impact. The Theory of Change for climate mitigation can be found [here](#), the Theory of Change for financial health & inclusion can be found [here](#).

How to use: Both practice (action, outcome and output) and impact performance need to be understood because practice is the conduit for achieving desired impacts (including targets). The Theory of Change allows to identify metrics and set targets which align with a bank's maturity. The indicators below are all connected to a bank's impact and can be considered as steps towards measuring impact. Some of the practice indicators (on the action, output, and outcome levels respectively) are connected to portfolio composition and financial targets¹⁶ (highlighted in **green**) or to client engagement¹⁷ targets (highlighted in **blue**), which enable your overall target. If your bank has prioritized climate mitigation and/or financial health & inclusion as (one of) your most significant impact areas, it is strongly recommended to report on the indicators in the Annex to measure your performance and baseline.¹⁸ Once you have set the target, you can use the indicators as guidance for your action plan as well as defining Key Performance Indicators (KPIs) which you can then use to measure progress against the set targets.

¹⁵ It is not required from banks to work with the Theory of Change concept internally. In fact, the Theory of Change has been used to structure the requirements of setting SMART targets using relevant indicators.

¹⁶ Financial targets also aim for real economy outcomes but are not directly expressed as such. Instead, they are expressed with financial indicators and metrics, e.g., to redirect flows of lending and investments to sectors, activities or projects aligned with SDGs and/or related to the selected impact area. Banks can also set financial targets related to specific types of customers e.g., low-income customers or female entrepreneurs.

¹⁷ Client engagement targets involve engaging relevant clients and customers to enable your overall target. The purpose of client engagement is to support clients towards transitioning their business models in line with sustainability goals by strategically accompanying them through a variety of customer relationship channels.

¹⁸ You might not be able to report on all indicators and/or or levels of practice (i.e. from left to right), in which case you should report on all applicable indicators on the respective level of practice no matter if it is an action, output or outcome indicator.

- **For Signatories of the Net-Zero Banking Alliance:** please report on the climate targets set as required in the [Guidelines for Climate Target Setting](#). As a member of the Alliance, you are required to publish first 2030 targets for priority sectors within 18 months and further sectoral targets within 36 months after signing. You can use the PRB template to disclose the required climate target information if its publication date is in line with the committed NZBA timeframe.
- **For Signatories of the Collective Commitment to Financial Health & Inclusion:** please report on financial health and/or financial inclusion targets set as required in the [Financial Health and Inclusion Commitment Statement](#). As a signatory to the Commitment, you have agreed to set a SMART ambitious target within 18 months after signing. To facilitate your process, please refer to the [Guidance on Target Setting for Financial Health and Inclusion](#) and the [Core Indicators](#) to measure financial health and inclusion. Keep in mind that signatories of the Commitment are encouraged to measure as many indicators as possible from the Core Set or their equivalent to be able to set a SMART impact driven target.

Impact area	Practice ¹⁹ (pathway to impact)									Impact ²⁰		
	1. Action indicators			2. Output indicators			3. Outcome indicators			4. Impact indicators		
	Code	Indicator	Response options & metrics	Code	Indicator	Response options & metrics	Code	Indicator	Response options & metrics	Code	Indicator	Response options & metrics
A. Climate change mitigation	A.1.1	Climate strategy: Does your bank have a climate strategy in place?	Yes / In progress / No	A.2.1	Client engagement process: Is your bank in an engagement process with clients regarding their strategy towards a low(er)-carbon business model (for business clients), or towards low(er)-carbon practices (for retail clients)?	Yes / Setting it up / No; <i>If yes:</i> Please specify for which clients (types of clients, sectors, geography, number of clients etc.)	A.3.1	Financial volume of green assets/low-carbon technologies: How much does your bank lend to/invest in green assets / loans and low-carbon activities and technologies?	bln/mn USD or local currency, and/or % of portfolio; <i>please specify</i> the definition of green assets and low-carbon technologies used	A.4.1	Reduction of GHG emissions: how much have the GHG emissions financed been reduced?	% over time; baseline and tracking GHG emissions in kg of CO ₂ e (or applicable metrics) ²¹
	A.1.2	Paris alignment target: Has your bank set a long-term portfolio-wide Paris-alignment target? To become net zero by when?	Yes / In progress / No; <i>If yes:</i> - please specify: to become net zero by when? - Emissions baseline / base year: What is the emissions baseline / base	A.2.2	Absolute financed emissions: What are your absolute emissions (financed emissions = scope 3, category 15) in your lending and/or	Total GHG emissions or CO ₂ e <i>(please also disclose what is excluded for now and why)</i>	A.3.2	Financial volume lent to / invested in carbon intensive sectors and activities and transition finance: How much does your bank lend to / invest in carbon-intensive	bln/mn USD or local currency, and/or % of portfolio	A.4.2	Portfolio alignment: How much of your bank's portfolio is aligned with Paris (depending on the target set [A.1.2] either 1.5 or 2 degrees)?	% of portfolio (please specify which portfolio; for corporate and business clients: % of sectors financed)

¹⁹ Practice: the bank's portfolio composition in terms of key sectors, its client engagement, and its relevant policies and processes, and, if applicable, its advocacy practices

²⁰ Impact: the actual impact of the bank's portfolio

²¹ If possible and/or necessary, please contextualize the progress: Greenhouse gas emissions might even increase initially because the scope of measurements is extended and financed emissions from a growing proportion of the portfolio are measured, emission factors are updated etc. Emission reductions made by the clients should over time lead to a decrease in GHG emissions financed.

		year for your target? - Climate scenario used: What climate scenario(s) aligned with the Paris climate goals has your bank used?		investment portfolio?			sectors and activities ²² ? How much does your bank invest in transition finance ²³ ?			
A.1.3	Policy and process for client relationships: has your bank put in place rules and processes for client relationships (both new clients and existing clients), to work together towards the goal of transitioning the clients' activities and business model?	Yes / In progress / No	A.2.3	Sector-specific emission intensity (per clients' physical outputs or per financial performance): What is the emission intensity within the relevant sector?	Please specify which sector (<i>depending on the sector and/or chosen metric</i>): kg of CO ₂ e/ kWh, CO ₂ e / m ² ; kg of CO ₂ e/USD invested, or kg of CO ₂ e/revenue or profit					
A.1.4	Portfolio analysis: Has your bank analyzed (parts of) its lending and/or investment portfolio in terms of financed emissions (Scope 3, category 15); technology mix or carbon-intensive sectors in the portfolio?	Yes / In progress / No; <i>If yes:</i> please specify which parts of the lending and investment portfolio you have analyzed	A.2.4	Proportion of financed emissions covered by a decarbonization target: What proportion of your bank's financed emissions is covered by a decarbonization target, i.e. stem from clients with	% <i>(denominator: financed emissions in scope of the target set)</i>					

²² A list of carbon-intensive sectors can be found in the [Guidelines for Climate Target Setting](#).

²³ Transition finance is defined as financing the transition towards a low-carbon future in alignment with the Paris climate goals. It entails any form of financial support for non-pure play green activities to become greener and reduce emissions.

	A.1.5	Business opportunities and financial products: Has your bank developed financial products tailored to support clients' and customers' reduction in GHG emissions (such as energy efficient mortgages, green loans, green bonds, green securitisations etc.)?	Yes / In progress / No; Please specify which ones, and what financial volume and/or % of the portfolio they account for		a transition plan in place?							
B. Financial health	B.1.1	# of products and services in the portfolio with a focus on financial health	Internal data based. Measures how many of the products and services in the portfolio have a financial health focus. We deem a product or service to have this focus when it facilitates decision making and supports financial health increase based on our definition of financial health. This covers products and services embedded with nudges to simplify decision making, round-up, high yield savings accounts, easy investment tools, etc.	B.2.1	# of individuals supported with dedicated and effective financial and/or digital education initiatives	Based on internal data. Measures the number of users (customers and non customers) of financial and/or digital skills-building initiatives offered by the bank. An initiative encompasses courses, programs, training videos, articles, SMS education campaigns, etc. Dedicated means that the initiative was specially created for a defined group of individuals (in many cases a prioritized group). Effective	B.3.1	% of individuals with a good and/or very good level of financial skills	Assessment based. Measures the percentage of individuals with a good and/or very good level of financial skills according to the assessment chosen by the financial institution. Should be measured on individuals benefitting from the bank's financial education initiatives.	B.4.1	% of customers with a high level of financial health	Survey and/or transactional data based. Measures the percentage of customers with a high level of financial health according to the score chosen by the financial institution.

					means that the bank has measured if the initiative is successful in generating the desired results of stronger financial skills, and thus, any individual that is supported with the initiative will achieve the desired results. A bank can't count a click as an individual so we encourage that the data is presented as # of individuals for deanonymized users and # of interactions for anonymized users.						
	B.1.2	% of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health	Based on internal data. Measures the percentage of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health. Including training to attend the needs of prioritized groups. Effective means that the bank has measured if the initiative is successful in generating the desired results of	B.2.2	% of customers actively using the online/mobile banking platform/tools	B.3.2	% of customers who use the bank's services to create a financial action plan with the bank	Transactional and/or survey data based. Measures the percentage of customers who create a financial action plan with the bank using the bank's services. A financial action plan is anything that helps the customer build financial resilience. It is done "with the bank" if the bank can visualize,	B.4.2	% of customers for which spending exceeded 90% of inflows for more than 6 months last year	Survey and/or transactional data based. Measures the percentage of customers with a transaction account and/or savings/investment accounts for which spending exceeded 90% of inflows for more than 6 months in the year within the reporting period compared to the total of customers within PRB scope. Focus on main

			stronger skills, and thus, any individual that is supported with the initiative will achieve the desired results. Relevant employees are those the bank prioritizes in the training program due to their direct impact on the customers' financial health			financial health tools)			through the transactions of the customer, the results of the plan.			financial institution customers.
	B.1.3	# of partnerships active to achieve financial health and inclusion targets	Based on internal data. Measures the number of partnerships currently active to achieve financial health and inclusion targets. By active we mean that are currently undergoing actions and generating results. We suggest disclosing the results of the partnerships in the commentary of the reports.				B.3.3	% of customers using overdraft regularly	Transactional data based. Measures the percentage of customers using the overdraft option in their accounts or credit cards, regularly. Overdraft can be used to handle unexpected emergencies but more than 1/3 of the year (banks may deviate if proper reasons are provided) denotes regularity and a precursor to lower financial health	B.4.3	% of customers that feel confident about their financial situation in the next 12 months	Survey based data. Measures the percentage of customers that answered positively to feeling confident about their financial situation in the next 12 months compared to the total number of customers surveyed. By confident we mean not feeling worried about their financial situation.
							B.3.4	% of customers with a non-performing loan	Transactional data based. Measures the percentage of customers with past-due loans ("past due"	B.4.4	% of customers with products connected to long-term saving and investment plans	Transactional and/or survey data based. Measures the percentage of customers with products

								defined by policies at each bank) compared to the total amount of customers with loans in the bank's lending portfolio.			connected to long-term saving and investment plans. "Long-term" will depend on each bank's definition.	
							B.3.5	% of customers showing an increase or stable amounts in savings, deposit and/or investment account balances, quarter on quarter.	Transactional data based. Measures the percentage of customers showing an increase or stable amounts in savings and/or deposit AND/OR investment accounts balances, quarter on quarter.	B.4.5	% of customers that would struggle to raise emergency funds or cover with insurance a major unexpected expense	Survey based data. Measures the percentage of customers that would struggle to raise emergency funds or cover with insurance a major unexpected expense. We consider a major unexpected expense, one that the customer hadn't planned for and would require them to spend more than what they have available for secondary expenses in their monthly budget or 1/20 th of the country's Gross National Income (banks may deviate if proper reasons are provided). A good example is: unforeseen medical bills, large appliance malfunctioning, car repair, etc. Survey based

					successful in generating the desired results of stronger financial skills, and thus, any individual that is supported with the initiative will achieve the desired results. A bank can't count a click as an individual so we encourage that the data is presented as # of individuals for deanonymized users and # of interactions for anonymized users.					
	C.1.2	% of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health	Based on internal data. Measures the percentage of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health. Including training to attend the needs of prioritized groups. Effective means that the bank has measured if the initiative is successful in generating the desired results of stronger skills, and thus, any individual that is supported with the initiative	C.2.2	% of customers with effective access to a basic banking product	Transactional data based. Measures the percentage of customers with effective access to a basic banking product. By effective we mean the usage beyond first access. Basic banking products vary by bank. Good examples are: checking accounts, payment accounts, credit cards, saving accounts, deposit accounts, e-	C.3.2	% of customers supported with dedicated customer journey/advisory services	"Transactional data based. Where dedicated customer journey/advisory services are in place for prioritized groups, this indicator measures the percentage of customers using such services. Depending on size of bank, either number or percentage can be the unit of measure.	

			will achieve the desired results. Relevant employees are those the bank prioritizes in the training program due to their direct impact on the customers' financial health			money accounts, etc.						
	C.1.3	# of partnerships active to achieve financial health and inclusion targets	Based on internal data. Measures the number of partnerships currently active to achieve financial health and inclusion targets. By active we mean that are currently undergoing actions and generating results. We suggest disclosing the results of the partnerships in the commentary of the reports.	C.2.3	# of new customers per month	Transactional data based. Measures the number of new customers per month. Once the bank sets a target, this indicator can become a KPI to measure the percentage of new customers from the prioritized groups, per month.	C.3.3*	% of customers actively using the online/mobile banking platform/tools	Transactional data based. Measures the percentage of customers logging in, at least once a month, to one of the following digital platforms (measure those applicable for your bank): Online internet banking and/or mobile phone banking and/or digital tools (including financial health tools, if applicable)			

To the Management of Eika Gruppen AS

INDEPENDENT AUDITOR'S LIMITED ASSURANCE REPORT ON EIKA GRUPPEN AS'S REPORTING AND SELF-ASSESSMENT TEMPLATE UNDER THE UNITED NATIONS ENVIRONMENT PROGRAM FINANCE INITIATIVE PRINCIPLES FOR RESPONSIBLE BANKING ("PRB") FRAMEWORK FOR THE YEAR ENDED 31 DECEMBER 2023.

We have performed a limited assurance engagement for the Management of Eika Gruppen AS ("Eika Gruppen") on the following discrete elements of the entity's Reporting and Self-Assessment Template (the "Selected Information") within the published PRB Reporting and Self-Assessment Template of Eika Gruppen for the year ended 31 December 2023:

- Principle 2.1: Impact analysis.
- Principle 2.2: Target setting.
- Principle 2.3: Plans for target implementation and monitoring.
- Principle 5.1: Governance and culture – describe relevant governance structures, policies and procedures.

Our qualified limited assurance conclusion

Based on our procedures described in this report, and evidence we have obtained, except for the effect of the matter described in the Basis of Qualified Conclusion section of our report, nothing has come to our attention that causes us to believe that the Selected Information for the year ended 31 December 2023, as described below, has not been prepared, in all material respects, in accordance with the Applicable Criteria.

Basis for qualified conclusion

We were unable to obtain sufficient and appropriate evidence about the Impact analysis because the scope of the analysis performed includes data from both Eika Gruppen and the Eika Alliance banks, as described in the entity's Reporting and Self-Assessment Template. That is, the scope of the Impact analysis is wider than what we are able to assure. Consequently, we were unable to provide our assurance on Principle 2.1: Impact analysis.

Furthermore, Eika Gruppen have not set targets. See further description of the matter in the Key Procedures section of our report. Consequently, we were unable to provide our assurance on Principle 2.2: Target setting and Principle 2.3: Plans for target implementation and monitoring.

Scope of our work

Eika Gruppen has engaged us to provide independent Limited assurance in accordance with International Standard on Assurance Engagements 3000 (Revised) *Assurance Engagements Other than Audits or Reviews of Historical Financial Information* ("ISAE 3000 (Revised)", issued by the International Auditing and Assurance Standards Board ("IAASB")) and our agreed terms of engagement.

The Selected Information in scope of our engagement, as presented in the entity’s Reporting and Self-Assessment Template for the year ended 31 December 2023 is as follows:

Selected Information	Applicable Criteria
<p>Discrete elements of the entity’s Reporting and Self-Assessment Template (the “Selected information”):</p> <ul style="list-style-type: none"> • Principle 2.1: Impact analysis. • Principle 2.2: Target setting. • Principle 2.3: Plans for target implementation and monitoring. • Principle 5.1: Governance and culture – describe relevant governance structures, policies and procedures. <p>as presented on pages 5-15 and 21-22 in the published PRB Reporting and Self-Assessment Template of Eika Gruppen for the year ended 31 December 2023.</p> <p>The guidance requires Eika Gruppen to publish other information within its Reporting and Self-Assessment Template. This other information is not the subject of this Assurance Report.</p>	<p>Reporting in accordance with the Principles for Responsible Banking “PRB” Framework established by the Guidance for banks (February 2021) and Reporting and Self-Assessment Template (September 2022) (“guidance”) published by the United Nations Environment Program Finance Initiative (“UNEP FI”).</p>

In relation to the Selected Information, as listed in the above table, the Selected Information needs to be read and understood together with the Applicable Criteria.

Inherent limitations of the Selected Information

We obtained limited assurance over the preparation of the Selected Information in accordance with the Applicable Criteria. Inherent limitations exist in all assurance engagements.

Any internal control structure, no matter how effective, cannot eliminate the possibility that fraud, errors or irregularities may occur and remain undetected and because we use selective testing in our engagement, we cannot guarantee that errors or irregularities, if present, will be detected.

Our review of source documentation did not include any detailed testing or procedures to verify the correctness and completeness of the information. We did not evaluate the design of particular processes and internal control activities or obtained evidence about their implementation or test their operating effectiveness.

Management’s responsibilities

The Management are responsible for:

- Selecting and establishing the Applicable Criteria.
- Preparing, measuring, presenting and reporting the Selected Information in accordance with the Applicable Criteria.
- Designing, implementing, and maintaining internal processes and controls over information relevant to the preparation of the Selected Information to ensure that they are free from material misstatement, including whether due to fraud or error.
- Providing sufficient access and making available all necessary records, correspondence, information and explanations to allow the successful completion of our independent limited assurance engagement.

Our responsibilities

We are responsible for:

- Planning and performing procedures to obtain sufficient appropriate evidence in order to express an independent limited assurance conclusion on the Selected Information.
- Communicating matters that may be relevant to the Selected Information to Management including identified or suspected non-compliance with laws and regulations, fraud or suspected fraud, and bias in the preparation of the Selected Information.
- Reporting our conclusion in the form of an independent limited Assurance Report to the Management.

Our independence and quality management

We are independent of the company as required by laws and regulations and the International Ethics Standards Board for Accountants' Code of International Ethics for Professional Accountants (including International Independence Standards) (IESBA Code), and we have fulfilled our other ethical responsibilities in accordance with these requirements.

We apply the International Standard on Quality Management (ISQM) 1, *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements*, and accordingly, maintain a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Key procedures

We planned our engagement in accordance with ISAE 3000 (Revised) and designed procedures to obtain sufficient appropriate evidence to express an independent limited assurance conclusion on the Selected Information in line with ISAE 3000 (Revised). Our procedures were informed by the Guidance for assurance providers – Providing limited assurance for report - Version 2 (October 2022) published by UNEP FI in November 2022. However, we have performed the procedures as outlined in 'the work we performed' section below which do not necessarily obtain the confidence level as outlined by UNEP FI's Guidance for assurance providers, but what is normally obtained by a practitioner in a limited assurance engagement under ISAE 3000 (Revised).

We are required to plan and perform our work to address the areas where we have identified that a material misstatement of the description of activities undertaken in respect of the Selected Information is likely to arise. The procedures we performed were based on our professional judgment and included, among others, an assessment of the appropriateness of the Applicable Criteria.

In carrying out our Limited assurance engagement on the description of activities undertaken in respect of the Selected Information, we performed the following procedures:

- We planned our procedures which were informed by the [Guidance for assurance providers – Providing limited assurance for report - Version 2 \(October 2022\)](#) published by UNEP FI in November 2022, considering Eika Gruppen's stage of implementation of the Principles for Responsible Banking.
- We conducted interviews with process owners and internal stakeholders to understand the processes for measuring, reporting, and presenting information in Eika Gruppen's Reporting and Self -assessment Template, in accordance with the Applicable Criteria.
- We made inquiries with process owners and internal stakeholders, obtained and reviewed source documentation to assess whether disclosures within the Selected Information in Eika Gruppen's Reporting and Self -Assessment Template reflect Eika Gruppen's assessment of the stage of implementation of the Principles. Our review of source documentation did not include any detailed testing or procedures to verify the correctness and completeness of the information. We did not evaluate the design of particular processes

and internal control activities or obtained evidence about their implementation or test their operating effectiveness.

- In respect of Principle 2.1 (Impact analysis), we have obtained the Impact analysis performed by Eika Gruppen. We have inspected and made inquiries of the scope of the impact analysis. The Impact analysis of Eika Gruppen includes data from both Eika Gruppen and the Eika Alliance banks, meaning that the Impact analysis focuses on products, services and activities that are not provided by Eika Gruppen. Furthermore, Eika Gruppen does not directly influence or control the Eika Alliance banks. Thus, it is our assessment that the scope and impact areas identified in the Impact analysis are too broad and do not directly relate to Eika Gruppen, but the Eika Alliance banks. Therefore, we are unable to provide our assurance on Principle 2.1: Impact analysis, and have not performed further substantive procedures on Principle 2.1 a-d.
- In respect of Principle 2.2 (Target setting), based on inquiries made and information obtained and reviewed, we have obtained a status on the target setting process. Eika Gruppen have not set and published targets, which is also described in Eika Gruppen's Reporting and Self-assessment Template. The targets addressing Eika Gruppen's significant impact areas will be finalized based on the double materiality analysis. A review of the actions taken to set targets, can only be conducted after the targets have been established. Therefore, we are unable to provide our assurance on Principle 2.2: Target setting.
- In respect of Principle 2.3 (Target implementation and monitoring), based on inquiries made with process owners and internal stakeholders, we have obtained a status on the target setting process. Eika Gruppen has not set and published targets, which is also described in Eika Gruppen's Reporting and Self-assessment Template. The targets addressing Eika Gruppen's significant impact areas will be finalized based on the double materiality analysis. A review of the defined actions to achieve the targets, as well as their implementation and monitoring can only be conducted after the targets have been established. Therefore, we are unable to provide our assurance on Principle 2.3: Target implementation and monitoring.
- In respect of Principle 5.1 (Governance Structure for Implementation of the Principles), based on inquiries made and information obtained and reviewed, we checked consistency to source documentation, including organisation charts and meeting minutes with that of the disclosures of Eika Gruppen's governance structure for implementation of the Principles. We checked that there is oversight over the implementation and monitoring and that the structure is in line with existing governance structures as defined by Eika Gruppen. Further, we checked that the Board of Directors obtained information on the Eika Gruppen's stage of implementation of the Principles for Responsible Banking on an annual basis.

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 a reasonable assurance engagement been performed.

Oslo, 15 April 2024
Deloitte AS

Henrik Woxholt
State Authorised Public Accountant

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