

Norion Bank
Group

Sustainability report
2024

Norion Bank's sustainability work

Norion Bank Group wants to be a long-term partner to both companies and private individuals. Through our brands, we offer customized financing solutions that meet distinct needs in three customer segments: medium-sized corporates and real estate companies, merchants, and private consumers. We enable tomorrow's business activities by operating responsibly in every aspect of what we do.

Our three strategic focus areas

Norion Bank wants to make a difference where the greatest impact can be made. Therefore we have grouped our key sustainability aspects into three strategic focus areas.



Business-minded

We are a business-minded, professional partner providing responsible financing, thereby enabling sustainable development for the bank and our customers.

Sustainability goals

- ▶ Annually contribute to improving the financial health and preventing over-indebtedness of our private customers.
- ▶ Set science-based climate targets for the bank's loan portfolio in the Corporate and Real Estate segments in 2025.
- ▶ By 2026, have in-depth customer dialogs on specific sustainability topics where Norion Bank has identified development opportunities.

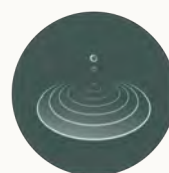


Committed

We create conditions for our employees to feel ownership and responsibility in their roles, and give them the necessary sustainability skills to build long-term success for both the bank and our customers.

Sustainability goals

- ▶ Annually achieve an eNPS of over 50, continue to develop the skills of our employees in sustainability and integrate sustainability into employee evaluation.
- ▶ In 2025, start working with sustainability ambassadors to integrate sustainability across the bank's different departments.
- ▶ By 2026, set targets directly linked to sustainability for relevant departments.



Caring

With a structured and transparent approach, we are a reliable partner which does business with care for our environment, our customers and our employees.

Sustainability goals

- ▶ Annually deliver on Norion Bank's vision of zero complaints regarding customer privacy, anticorruption and marketing.
- ▶ In 2025, reduce the share of cost-based emission factors in favor of supplier-specific emission factors.
- ▶ By 2026, have assessed 90% of significant suppliers against sustainability criteria.



Photo: Anna Roström

As a specialist in financing solutions, Norion Bank is a leading complement to traditional large banks, with a vision of being the leading Nordic financing bank in its chosen segments. Through our activities, we want to help create long-term value for our stakeholders: customers, investors, employees and society. We strive to create long-term value from a financial, social and environmental perspective. Together with our customers, we want to contribute to future sustainable development.

By being business-minded, committed and caring we enable our customers to continue to grow and develop. These are the bank's values and the focus areas of its sustainability strategy. These value statements are fundamental to how we conduct our daily business and are integrated into our policy documents. They describe how we want to be perceived and how we should act in our relationships with customers, partners and colleagues. "Business-minded" illustrates what we do, "committed" who we are and "caring" how we behave. The double materiality analysis conducted in 2023 in accordance with the EU regulation, Corporate Sustainability Reporting Directive (CSRD) and associated standards, the European Sustainability Reporting Standards (ESRS), include an assessment of both internal and external factors that may affect the bank's operations and stakeholders. The results of the analysis form the basis for the bank's further work.

Objectives and implementation

In 2024, Norion Bank accelerated the mapping of emissions in the bank's value chain by ensuring data collection for credits and thus aligning the methodology for the credit portfolio with the

industry initiative Partnership for Carbon Accounting Financials (PCAF)¹. PCAF aims to measure carbon emissions linked to investments or credits in a uniform way, thus facilitating the achievement of the Paris Agreement. It is an important tool in the bank's existing portfolio analysis in order to estimate the carbon footprint of the loan portfolio.

During the year, the bank published a green framework² and issued green bonds³ for the first time. The green bonds are a direct result of our efforts to integrate sustainability into our business, where we help our customers in the transition by financing green businesses. As part of the establishment of the Green Framework, the bank has also established the Green Bond Committee. The Committee has decision-making powers regarding the inclusion of loans that meet the Green Framework criteria in the bank's Green Register. The Committee is composed of representatives from Sustainability, Corporate/Real Estate, Treasury and Credit.

In order to clarify our ambitions and create a foundation for continuous improvements, Norion Bank has set sustainability goals for the business. The overall ambition is to contribute, in a measurable way, to the UN Sustainable Development Goals by 2030 and to the Paris Agreement. We want to increase our positive impacts and reduce the negative ones from our financing activities. We have identified ambitions and activities within our strategic focus areas to make this happen. Each year, our activities and ambitions will be updated and developed to gradually bring us closer to the 2030 target. We also focus our efforts on initiatives that promote sustainable business.

¹ For more information on the Partnership for Carbon Accounting Financials (PCAF) measurement methodology, see www.carbonaccountingfinancials.com.

² For more information on the Norion Bank Green Bond Framework 2023, see the Norion Bank website.

³ For more information, see pages 30–31 and the Norion Bank website.

Norion Bank's contribution to the UN Sustainable Development Goals (SDGs)⁴

Norion Bank is both impacted by and impacts our environment and our stakeholders. Together with our stakeholders, we have a direct impact on both the planet and society, and the planet and society affect the bank's operations, our stakeholders, customers, business models and thus their ability to repay.

We have prepared our third report for the UN Global Compact⁵, and the bank has been a signatory to the UN Principles for Responsible Banking (PRB⁶) since 2021. The six principles of the initiative set the framework for a sustainable banking system that drives the global economy in a sustainable direction. This commits us to align our business activities with the Paris Agreement and to continuously contribute positively to society in line with the UN Sustainable Development Goals. These are commitments that clarify our ambition to contribute to responsible growth and long-term value creation for all our stakeholders.

An impact assessment has been carried out to evaluate the bank's contribution to the 2030 Agenda and the SDGs. We contribute partly through our own activities, primarily by being an attractive employer, by working to reduce the bank's direct emissions and by combating corruption. Our main impact, however, is through the credit portfolio, i.e., which businesses we finance. We have identified four SDGs on which our activities have the greatest impact, in both positive and negative terms. The SDGs go hand in hand with the bank's work towards implementing the EU's CSRD⁷ framework.



Through its lending activities, Norion Bank directly and indirectly drives economic development by supporting companies, jobs and growth in society and providing access to capital for private individuals. We work for financial inclusion. We want to be a long-term partner to our customers and help them to understand their sustainability risks.



Norion Bank does business with care for our surroundings. This means reducing our own direct and indirect emissions, as well as reducing the emissions of the corporate and real estate credit portfolio. In the credit portfolio, this is done by Norion Bank being a professional partner that assists clients in transforming business plans to be resilient during the global climate transition.



Through the Real Estate segment, Norion Bank contributes to inclusive, innovative and resilient cities. In 2024, the mapping of emissions in our real estate portfolio, through the PCAF methodology, has been refined. This is to develop how we measure and report the climate impact of the bank's loan portfolio. Green buildings are documented and included in the bank's Green Register.



Sustainable development is based on a society at peace. Norion Bank's activities are intended to contribute to financial stability. We shall be a reliable partner at all the different stages of our activities, countering all forms of corruption, money laundering and cybercrime. Norion Bank will not finance activities that violate the criteria set out in the bank's sectoral guidelines ("Red List⁸").

⁴ Sustainable Development Goals (SDGs – United Nations Global Goals for Sustainable Development).

⁵ The United Nations Global Compact (UN – Global Compact) was implemented in 1999 and is the world's largest sustainability network in the private sector. The UN Global Compact is based on the ten principles in the areas of human rights, labor, climate and anticorruption.

⁶ Read more about the Principles for Responsible Banking (PRB): www.unepti.org/banking/bankingprinciples.

⁷ Norion Bank will report in accordance with the CSRD from 2025 onwards.

⁸ The Red List is Norion Bank's exclusion list, which describes the types of activities that the bank chooses not to finance. The exclusions are both product and norm-based. The Red List is available at www.norionbank.se/en-SE/about-norion/sustainability.



Business-minded

By focusing on being business-minded, we stand for responsible financing that enables sustainable development for the bank and the world around us. It is through sound lending and good customer relations that we can minimize risks, create positive value for our stakeholders and leave a sustainable mark on society.

Access to capital is important for both private individuals and businesses. Credit is a significant financial instrument for society, and sound and sustainable lending is fundamental to Norion Bank's work. As a bank, we want to be a natural part of our customers' finances and contribute to financial inclusion. We are committed to being business-minded and to being a professional partner in contributing to sustainable development.

As part of this work, Norion Bank wants to foster the entrepreneurs of tomorrow by encouraging innovation and entrepreneurship. Norion Bank participated, for the third time, in the jury of the Swedish Ung Företagssamhet competition Alumninästet!. The competition is Ung Företagssamhet Sweden's version of Shark Tank and gives students in their third year of upper secondary school the opportunity to present their business idea. The aim of the partnership is to develop young talents' business ideas and thus inspire them to start businesses. By supporting tomorrow's entrepreneurs, Norion Bank wants to contribute to a sustainable future and an economically well-functioning society.

Sustainability in the lending process

Corporate lending is part of Norion Bank's core business, and it is essential that the lending business is based on customers' ability to repay loans. Since we know that the bank's biggest impact on the world lies in our credit portfolio, we attach great importance to responsible lending. We do this by identifying operations and business models that are robust and generate good returns while conducting a thorough risk analysis. By integrating and assessing companies' sustainability work in the credit process that governs our corporate lending, we can contribute to emission reductions and sustainable social development from other aspects as well.

During the year, we updated our methodology for measuring the climate impact of the bank's loan portfolio in line with the PCAF methodology. The implementation of internal processes and sustainability requirements is ongoing, with, e.g., the Red List, since 2022, being an integral part of the work to identify sustainability risks. Norion Bank's Ethics Committee (EC²) acts as an advisory group on customer and sustainability-related risks based on the Red List. Before the bank decides on credit approval or rejection, and if the

credit request is considered complex or possibly related to the exclusion criteria, the EC is consulted. The credit decision is then subject to approval or rejection by the EC. Furthermore, the bank conducts systematic reviews of both new and existing credit, including ESG assessments, to evaluate whether any new risks have emerged and how any risks are managed by the lender. If a significant change in the risk assessment is observed, the bank may – given the circumstances, contractual terms, conditions and customer dialog – choose to terminate the credit agreement.

A sustainable society depends on a robust financial system that cannot be abused. This is why anti-money laundering and counter-terrorist financing is part of the 2030 Agenda and the Global Goals. Norion Bank sees the prevention of financial crime as a fundamental principle for safe and sound banking operations. Governance documents, policies and procedures provide guidance on how we can contribute to the protection of human rights, better working conditions and reduced emissions. The documents are revised annually.



Photo: Anna Rostrom

The Corporate portfolio's risks and opportunities³

We want to identify sustainability risks in order to reduce negative impacts on the environment and society, and find opportunities in companies with competitive business models. Like all participants in the financial sector, we have a fiduciary duty to allocate capital in a way that helps companies to transform their operations and make the necessary climate adaptations.

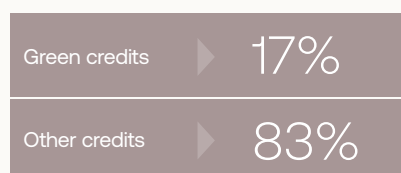
With the bank's updated ESG analysis in the lending process, we ensure a more clear mapping of sustainability risks and opportunities in the credit portfolio. During the year, work continued on monitoring the corporate portfolio with regard to sustainability, and 84% of the portfolio has undergone ESG analysis in accordance with the updated procedures. The follow-up is based on the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD⁴), which are also taken into account in the updated ESG analysis. The work started in 2022–2023 and has continued in 2024 in order to update and develop our internal processes and cover a larger part of the portfolio. During the year, we furthered our understanding of how we, as a bank, are affected by the climate and its impacts and agreed on long-term climate targets for our operations.

Responsible consumer lending

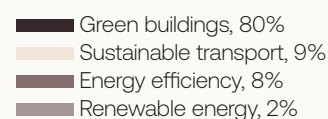
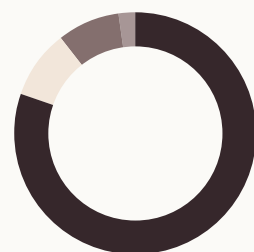
Sound and sustainable lending is of great importance to the bank. Our sustainability strategy focuses on corporate lending, where we have our primary impact, but also responsible lending to individuals is crucial to being a long-term partner. Customers who experience payment difficulties are a loss for Norion Bank, for the customer and for society as a whole. We ensure solvency through a careful credit granting process based on the private consumer's actual financial circumstances. Since 2023, lending has continued to gradually shift from loan intermediaries to the bank's own channels, contributing to increased transparency and better conditions for working closely with our customers.

Allocation of credits

Within the Corporate and Real Estate segment for 2024:



Financing in green categories



¹ Ung Företagssamhet Sweden (UF), www.ungforetagsamhet.se.

² The Ethics Committee (EC) deals with areas including human rights, tax issues, environmental challenges and ethical dilemmas.

³ The "Corporate portfolio" refers to the credit portfolio in the Corporate and Real Estate segments.

⁴ The Task Force on Climate-Related Financial Disclosures (TCFD) is a framework to help organizations identify and prevent their climate-related financial risks.



Committed

Our focus on committed employees allows us to generate good results for both ourselves and our customers. We work to offer a stimulating workplace, a good working environment, and the right conditions to contribute to our collective success.

Norion Bank employs various professional groups who work closely together in a dynamic environment with a strong spirit of progress. In order to deliver sustainable growth and to continue to develop our business, it is essential for us to attract the best people. This is why we aim to be an attractive employer in the industry, offering a stimulating workplace. We want our employees to feel ownership and responsibility in their roles and we create conditions for this through explicit self-leadership. Employee involvement enables the long-term success of both the bank and our customers. Our ambition to contribute to a sustainable transformation of society means that sustainability aspects are taken into account in all the bank's processes. This is why we invest in our employees and offer them internal and external training to ensure they have the sustainability skills they need.

In 2024, the option of vacation exchange was introduced, which means that employees can choose to convert their vacation pay into an extra week of leave. This investment reinforces our ambition to offer an attractive workplace where our employees are empowered for self-leadership.

Focus on a stimulating workplace

The ability to support our customers depends on the continuous development of capacity and knowledge across all functions of the bank. According to the employees, Norion Bank is characterized by a culture where people can express their opinions freely, a workplace with healthy leadership and an inclusive environment. To us it is crucial that each individual's development is valued, which translates into a strong focus on self-leadership and skills development. Therefore, Norion Bank conducts several training courses each year to give employees the right tools and capabilities. The bank has been affiliated with Swedsec¹ since 2022 and has licenses for client executives and the management team.

All our employees undergo mandatory internal training on GDPR, anticorruption, and handling of complaints. Furthermore, the training "Sustainability Certification in the Financial Sector"² is available on the bank's intranet and is mandatory in the induction for new employees. An annual update of the sustainability certification is carried out by all employees.

New managers in the bank are also offered training in occupational health and safety, recruitment, rehabilitation and labor law. The bank strives to ensure that the culture is characterized by openness, commitment and clarity, which contributes to the high satisfaction and high eNPS³ (Employee Net Promoter Score). As part of our work, we conduct employee reviews with focus on satisfaction, development and performance in relation to the bank's values.

To further strengthen employee engagement, the bank has established an ambassador group where views and ideas are captured and translated into improvements. During the year, the management team has defined a clear vision and strategies for the future of Norion Bank, giving employees a clear direction and increasing motivation. By linking individual work to the company's overall objectives, we create a sense of meaning and commitment. The bank's HR processes focus on skills development, leadership support and responsive dialogue to ensure a work environment where people grow. This contributes to an organisation that can develop sustainably and successfully.



Photo: Anna Roström

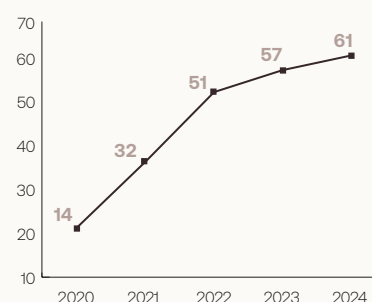
Focus on employee well-being

Norion Bank applies a systematic system in order to control, investigate, rectify and monitor the workplace. It is an investment to achieve high levels of satisfaction, motivation and well-being. The result of this can be seen as Norion Bank once again showed very good results in the employee survey. With a response rate of 90% and an eNPS of 61, the bank is placed in the category "Very Strong Ambassadorship"⁴. This means that a significant majority of employees are satisfied with the bank as an employer and actively recommend Norion Bank as a place to work. A high eNPS indicates that we have a strong company culture where employees feel engaged, valued and motivated. The high level of employee engagement is also a clear result of the bank's investment in its staff and a working environment that promotes well-being and motivation.

Norion Bank works actively to be a workplace where all employees make a full contribution based on their different experiences, background and skills. There is zero tolerance for direct or indirect discrimination or harassment in the workplace. All employees must be treated in accordance with our Inclusion and Human Rights Policy⁵. The employee survey shows that the bank has very good results in all areas of discrimination. Norion Bank works in a structured way to promote equal pay for men and women, to recruit, develop and promote people with foreign backgrounds and to increase the diversity of our teams and within the management team.

eNPS

61



¹ Swedsec is a licensing system for financial market employees, with the intention of strengthening competence and customer protection in the financial industry.

² The training "Certification Sustainability in the Financial Sector" is provided by Finanskompetens FU AB.

³ eNPS measures the propensity to recommend Norion Bank as an employer.

⁴ Score eNPS of over 50 is categorized as "Very Strong Ambassadorship."

⁵ The Inclusion and Human Rights Policy is available at www.norionbank.se/en-SE/about-norion/sustainability.



Caring

Norion Bank’s focus on being caring means that we have a structured and transparent way of working, which is a prerequisite for good business ethics and lasting success that contributes to long-term sustainable social development.

Norion Bank has a responsibility to run its business in a way that enables it to have a positive impact on the environment and society. Our focus on being caring means that we take responsibility for how our business is run. We provide governance documents, such as policies and instructions, to help our employees understand how the organization should work to remain an ethical business partner. We continuously engage in dialogue with our stakeholders to understand their challenges and create clear guidelines, processes and policies to meet their needs.

Governance and organizational structure

All our stakeholders – from investors, employees and customers to suppliers and partners – should feel confident that we conduct business with consideration for our surroundings and society. Our governance work is based on the UN Global Compact’s ten principles on respect for human rights, labor, environment and anticorruption. It aims to make a long-term contribution to an integrated ethical, social and environmental perspective throughout our business.

The Board is ultimately responsible for sustainability issues within Norion Bank and sets the policy framework and control processes. The CEO and Chief Sustainability Officer are responsible for integrating sustainability work into the business, and the CEO has established the Ethics Committee as a decision-making forum for, among other things, sustainability issues that need to be addressed specifically. With the CSRD coming into force in 2025, Norion Bank has conducted a review of our internal processes to ensure that sustainability information is managed and reported in a way that meets the requirements of the regulations as well as other standards and initiatives. Furthermore, our whistleblowing process encourages all employees and external stakeholders to report suspicions of potential or actual misconducts in the business.

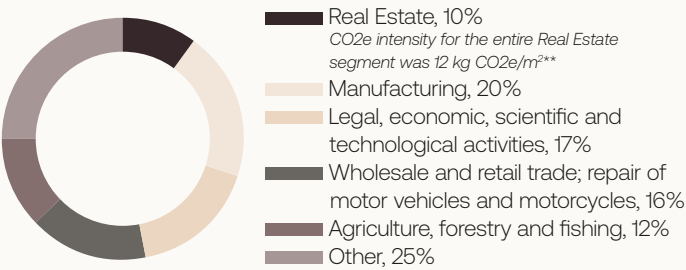
Structured and efficient decision-making processes

Creating a sustainable transition requires the financial sector to work together¹. This means developing the bank’s work on reporting negative and positive

impacts in key sustainability areas and formulating future targets based on scientific guidelines. As a bank, we are subject to a number of regulations and is licensed by the Swedish Financial Supervisory Authority. To comply with these external regulations, we have developed internal policy documents. The governance documents consist of policies, CEO instructions and guidelines that are developed as needed and enable good standards and practices throughout the bank. Our policy documents are drafted by the relevant functions and reviewed by the relevant committee and/or special committee before being adopted by the Board of Directors, the CEO or the relevant Head of Department. We are transparent with our stakeholders, and the policy documents related to sustainability are published on our website. As part of its efforts to comply with the CSRD, the bank has initiated a review of policies and governance documents in 2024. This work will continue in 2025 to ensure full compliance.

Business category*	tCO2e	Share in % of portfolio
Real Estate	13,467	10%
Manufacturing	26,876	20%
Legal, economic, scientific and technological activities	22,496	17%
Wholesale and retail trade; repair of motor vehicles and motorcycles	20,628	16%
Agriculture, forestry and fishing	15,964	12%
Other	32,963	25%
Total	132,394	100%

CO2e split



* Financed emissions have been calculated in accordance with the PCAF methodology. For real estate, the calculation is based on real estate-specific data and the credit's share of the property's value. For corporate loans, financed emissions are calculated on estimates based on the companies Nace code and geographical domicile. This has resulted in an emission factor which has been multiplied with the bank's outstanding balance.

** For real estate credits, the calculation is based on the buildings actual size and EPC class, where existing buildings are used as security. The data coverage rate of the portfolio is 61%. It has been assumed that the remaining part of the real estate portfolio, where data are missing, replicates the portion where data is available.



Caring for our environment

Norion Bank's Environmental Policy guides our work on how we can reduce the bank's impact through informed decisions that take climate and environmental issues into account. As part of aligning our business with the Paris Agreement we have set a milestone of becoming climate-neutral in own operations no later than 2025. This means having net zero greenhouse gas emissions from Scope 1 and 2, which includes the bank's energy consumption and company cars. The ability to make a direct impact on these, in our own operations, where the energy consumed by servers and the heating of our buildings constitute the largest share. Reaching the carbon neutrality target has been achieved by offsetting our remaining Scope 1 and Scope 2 emissions. The carbon offset was implemented, for the third year, through the financing of micro-loan projects to help families in rural Kenya².

During the year, the bank set a new climate target: to achieve net zero emissions by 2045. This is in line with our long-term ambition to reduce our climate impact to contribute to a sustainable climate transition to achieve the Paris Agreement.

We are continuously examining how we can develop our products and services so that both the bank and our customers can reduce their carbon footprint. One example of how the bank's activities support reducing emissions is that we are mainly reached via digital channels and telephone. In this way, we simplify the service for our customers and, at the same time, reduce transportation and office operations. On the other hand, to develop digitally, we need server halls for data storage. We engage with our suppliers who are working to reduce their

emissions. Using our resources more efficiently and recycling what we no longer use is an important step to reduce our own environmental impact. During the year, the bank continued with a take-back service for IT products. This means that equipment we no longer use can be given a second life through resale for reuse. In addition to extending the lifetime of products, we contribute to a more circular economy.

Emissions from our own operations come mainly from our office buildings, purchases and travel. We are working purposefully to reduce these emissions, for example by prioritizing digital meetings in our environmental policy, and recommending rail over air for business travel. The bank also places great emphasis on choosing offices that are designed to be as environmentally friendly and energy efficient as possible. Our head office in Gothenburg has a Gold rating according to the international environmental standard LEED³, our office in Finland has a BREEAM Excellent rating, and our Stockholm office has a BREEAM In-Use Very Good rating⁴. As a tenant, we engage in dialogue with landlords in order for our other offices to develop in the same direction.

The bank's indirect emissions and other environmental impacts, which occur along our value chain, were assessed in 2023⁵. The assessment resulted in eight categories, six upstream and two downstream, being deemed relevant to the bank's Scope 3 emissions. However, the largest climate impact for Norion Bank is via our customers in the Corporate and Real Estate segments, through financed emissions⁶. Thanks to increased data collection during the year, the calculation of our financed emissions has been

completed as of December 31 in accordance with the PCAF's methodology. The results show that, although the collection of data for the calculation of financed emissions has improved significantly during the year, there are still challenges with data quality. The outcome⁷ indicates that the real estate portfolio, which accounts for a large volume of loans in the bank's credit portfolio, appears to account for a low share of financed emissions. This is most likely due to different calculation methods for different asset classes within the PCAF methodology, as well as different data quality for the asset classes. The CO₂ intensity of the real estate portfolio was 11.67 kg CO₂e/m².

Estimates tend to overestimate emissions, which explains why sectors with smaller lending volumes in the credit portfolio appear to account for a large share of total emissions financed. This means that it is currently not possible for the bank to compare the different segments with each other. Increased data quality is required to enable this, which is part of the continued work in 2025. Norion bank will take the results of this first calculation of financed emissions into account when further developing our climate targets for the credit portfolio.

¹ Examples of collaborations in which Norion Bank has participated are the UN Principles for Responsible Banking (PRB) and the UN Global Compact.

² See more detailed information on Gold standard Siaya cookstoves: www.zeromission.se.

³ See more information on LEED certification: www.sgbc.se/certifying/leed.

⁴ See more information on BREEAM certification: www.breeam.com.

⁵ Scope 3 totals 3,314 tCO₂e for 2024 and includes all relevant Scope 3 categories for the bank expect category 15 (attributable to the credit portfolio) which is reported separately. The significant increase since 2022 is due to the inclusion of more Scope 3 categories overtime.

⁶ Calculations of financed emissions for the bank's private loans are not calculated, as PCAF currently does not provide a calculation method for this kind of financing.

⁷ See table and graph on previous page.

Sustainability report

in accordance with the Swedish Annual Accounts Act

Governance

The ultimate responsibility for sustainability issues lies with the Norion Bank Board of Directors, which sets the Bank's policy framework and control processes. For 2024, the Board has provided quarterly updates on sustainability, and a more detailed review has taken place every six months. The CEO and Chief Sustainability Officer are responsible for integrating sustainability into the business.

The Ethics Committee¹ deals with sustainability issues of complex nature, that need to be considered outside of normal procedures by the relevant department. The governance work is based on the Bank's Sustainability policy² and the UN Global Compact's ten principles on respect for human rights, labor, environment and anticorruption. It aims to make a long-term contribution to an integrated ethical, social and environmental perspective throughout our business. Norion Bank is a member of the Swedish Bankers' Association, a signatory to the UN Global Compact and the UN Principles for Responsible Banking (PRB).

Processes, governance and principles

Having well-functioning processes and procedures in place within the Bank is central to Norion Bank's strategy and governance. This is an ongoing project, and we strive to further enhance and improve its procedures and processes. The Bank has a number of policies and policy documents that operationalize our key sustainability areas and aspects, which among other things comprise: Sustainability policy, Environmental policy, Diversity policy for the Board of Directors, Anticorruption policy, Policy on inclusion and human rights, Code of Conduct, and Risk and Credit policy³. Norion Bank's policy documents are revised annually and are published on the website to increase transparency to our stakeholders.

To ensure the implementation of, and compliance with the Bank's policy documents, responsibility is given to relevant member of the management team, for implementation of strategies, training of employees and following-up of results.

Goal

In 2024, we have further developed our sustainability work and have intensified our work on collecting relevant data to measure the identified targets in each focus area, as well as updating and developing new targets according to plan. This work is part of the Bank's overall sustainability ambition to contribute, in a measurable way, to the UN Sustainable Development Goals and the Paris Agreement by 2030.

Our three strategic focus areas

Norion Bank wants to make a difference where the greatest impact can be made. This is why we have grouped our key sustainability aspects together into three strategic focus areas.

Business-minded

We are a business-minded, professional partner providing responsible financing, thereby enabling sustainable development for the Bank and our customers.

Sustainability targets:

- Contribute annually to improving the financial health and preventing over-indebtedness of our private customers.
- In 2025, set science-based climate targets for the Bank's credit portfolio in the Corporate and Real Estate segments.
- By 2026, engage with corporate clients on specific sustainability topics where Norion Bank has identified opportunities for development.

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We create conditions for our employees to feel ownership and responsibility in their roles, as well as give them the necessary sustainability skills to build long-term success for both the Bank and our customers.

Sustainability targets:

- Annually achieve an eNPS of over 50, continue to develop the skills of our employees in sustainability, and integrate sustainability into employee evaluation.
- In 2025, start working with sustainability ambassadors to integrate sustainability across the Bank's different departments.
- By 2026, set targets directly linked to sustainability for relevant departments.

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With a structured and transparent approach, we are a reliable partner that does business with care for our environment, our customers and our employees.

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- Annually deliver on Norion Bank's vision of zero complaints about customer privacy, anticorruption and marketing.
- In 2025, reduce the share of cost-based emission factors in favor of supplier-specific emission factors.
- By 2026, have assessed 90% of significant suppliers against sustainability criteria.

Follow-up on sustainability targets

With this sustainability report, Norion Bank states that the company is developing and following up our set targets. Norion Bank's sustainability strategy leads to three focus areas with timed targets that are updated yearly, to bring us closer to our ambition of contributing in a measurable way to the UN Sustainable Development Goals and the Paris Agreement.

In 2024, work continued on mapping the corporate portfolio from a sustainability perspective, with 84% of the portfolio reviewed according to updated ESG analysis procedures. This work is based, among other things, on the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD), which are also integrated into our updated lending processes. The Bank has previously set the interim target of being climate-neutral in its own operations (Scope 1 and 2) by 2025. The target has been met since 2022 by offsetting our scope 1

¹ The Ethics Committee must be consulted in the case a new customer or a credit case is considered difficult to assess from a sustainability risk perspective. Each business unit has a delegated responsibility for ensuring that policies and processes are continuously updated, followed and complied with. See more information on page 37.

² Norion Bank Sustainability Policy: www.Norionbank.se/hallbarhetsarbete.

³ More information on Norion Bank Policies and Guidelines: www.Norion-bank.se/hallbarhetsarbete.

and 2 emissions. During the year, the Bank set a new target: to achieve net zero emissions by 2045. Furthermore, an important step in the mapping and understanding of our financed emissions has been to conduct a climate calculation on the Corporate and Real Estate credit portfolio in accordance with the PCAF methodology. The results show that data collection and ensuring reliable data quality is of utmost importance to obtain relevant, comparable figures. For Real Estate credits, the calculations have been based on actual size and EPC class, using existing buildings as collateral and reaching a data coverage rate of 61% of the portfolio. It has been assumed that the remaining part of the real estate portfolio, where data are missing, replicates the portion with data. The CO₂ intensity of the real estate portfolio thereby totaled 11.67 kg CO₂e/m². For corporate loans, the calculation was based on estimates, based on the companies' NACE code and geographical location, resulting in an issue factor multiplied by the Bank's outstanding balance. This means that it is currently not possible to compare the different segments with each other. To enable comparison, increased data quality is required, which is part of the continued work in 2025.

With Norion Bank issuing green bonds in 2024, we have developed the necessary processes, committees and structured data collection to set targets for the development of the Bank's green assets. An increase in the Bank's green assets is an important step in our future work to reduce the Bank's climate impact.

Through Corporate Accelerator, Norion Bank's training program to support companies with skills, we aim to contribute to better financial health. In 2024, sustainability has had a more present role in the program.

A further example of how our work promotes financial health is the increased use of proprietary channels in retail lending. This allows us to have a closer dialogue with customers, giving us better insight into their specific needs and circumstances. Furthermore, focus groups have analyzed the possibility of including ESG aspects in the evaluation process of the Bank's employees and decided to do so in 2025.

Material sustainability aspects for Norion Bank

Double materiality analysis

Norion Bank conducted a double materiality analysis in 2023 in accordance with the EU Corporate Sustainability Reporting Directive (CSRD) and the associated European Sustainability Reporting Standards (ESRS). The results form the basis for our continued efforts to be a sustainable and responsible business.

The new regulations will apply at different times for different types of companies. Norion Bank is in scope from 2025 and does not intend to report in accordance with ESRS for the sustainability report in 2024.

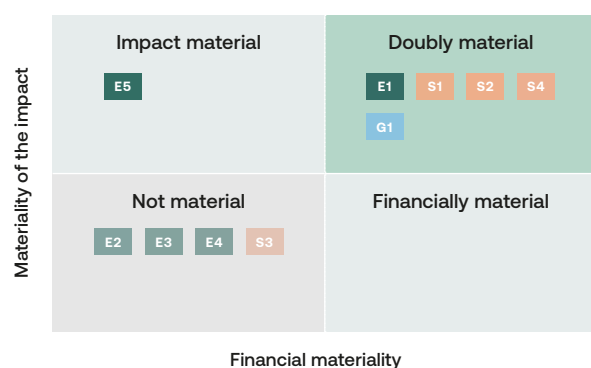
As a next step in the preparation for the CSRD, we have conducted a Gap Analysis during the year to verify which data points are available and which are missing, in order to initiate an internal allocation of responsibilities. In 2024, a revision of the 2023 double materiality analysis has been conducted, resulting in the standards "biodiversity and ecosystems" and "water and marine resources" being reassessed to be categorized as not material. The assessment is based on the development of EU recommendations published during the year and industry practice. As preparation for the future CSRD reporting, we will approach reporting for the areas S1 – Own workforce and G1– Business conduct in this year's report.

The double materiality analysis included an assessment of both internal (actual or potential positive or negative impacts) and external (risks or opportunities) factors that may affect Norion Bank's operations and stakeholders. Full details of the double materiality analysis methodology will be published in the 2025 report.

In the initial work, we have mapped our own operations and taken into account the Bank's specific product and service offering, but also placed great emphasis on the Bank's value chain, which includes our customers and how they can influence or be influenced by the Bank's operations. As part of the work, stakeholders who know the business have been identified and interviewed, and workshops have been conducted to gain a deeper understanding of where Norion Bank has the greatest impact. The Bank's financing to corporate customers represents a large part of our business, and the composition of the loan portfolio has been taken into account in the assessment. In evaluating impacts, risks and opportunities for the various sustainability issues and the financial effects, Norion Bank has identified a number of categories in environmental, social and governance aspects.

The significance of the impact has been assessed on the basis of four criteria: type of impact, severity, assessed likelihood and for negative impacts, recoverability. Financial materiality has been assessed on the basis of risk or opportunity, the potential impact on financial position and assessed likelihood. The results have been validated by the Bank's management team to ensure internal ownership. As part of the work on future reporting, we are using a digital platform to report and monitor our data.

Results of the materiality analysis at ESRS topic level



Results at subject level

		Impact materiality	Financial materiality
ESRS E1	Climate change	✓	✓
ESRS E2	Pollution	x	x
ESRS E3	Water and marine resources*	x	x
ESRS E4	Biodiversity & ecosys.**	x	x
ESRS E5	Circular economy	✓	x
ESRS S1	Own workforce	✓	✓
ESRS S2	Workers in the value chain	✓	✓
ESRS S3	Affected communities	x	x
ESRS S4	Consumers & end-users	✓	✓
ESRS G1	Business conduct	✓	✓

*E3 – Water and marine resources has been reclassified as not material for Norion Bank during the validation for AR 2024.

**E4 – Biodiversity & ecosystems has been reclassified as not material for Norion Bank during the validation for AR 2024.

Each category should be reported in terms of governance, strategy, policies, activities, targets and metrics. These are general disclosures and subject-specific disclosures. Added to this are further reporting layers linked to the general, sectoral and company-specific standards.

Summary of the Bank's identified impacts, risks and opportunities:

Significant sustainability area ⁴	Significant subcategories	Impacts, risks and opportunities ⁵	Current targets/KPI	Policies and policy documents
E1 – Climate changes	<ul style="list-style-type: none"> Climate change adaptation Climate change mitigation Energy 	<ul style="list-style-type: none"> The Bank impacts and is impacted by climate change, which includes physical and transition-related risks. By financing energy-efficient solutions and sustainable buildings, the Bank can position itself in the market. 	<ul style="list-style-type: none"> Develop processes to include ESG in risk appetite. Reducing our Scope 1 and 2 CO₂ emissions and use of electricity and heating. 	<ul style="list-style-type: none"> Environmental policy Sustainability policy Green framework
E5 – Resource use and circular economy	<ul style="list-style-type: none"> Waste 	<ul style="list-style-type: none"> Financing construction and renovation projects generates waste, which can be reduced by recycling. The Bank can develop green loans that focus on recycling. 	<ul style="list-style-type: none"> Working towards circularity by helping our customers develop sustainable models. 	<ul style="list-style-type: none"> Environmental policy Green framework
S1 – Own workforce	<ul style="list-style-type: none"> Working conditions Equal treatment and equal opportunities for all employees 	<ul style="list-style-type: none"> The Bank has a positive impact by providing good working conditions, contributing to physical and mental health, and creating safety and security for employees. Failure to ensure this can have a negative impact. 	<ul style="list-style-type: none"> Number of new employees and staff turnover. Skills development and training hours. Sick leave and diversity work. 	<ul style="list-style-type: none"> Inclusion and human rights policy Code of Conduct Work environment policy Diversity policy for the Board
S2 – Workers in the value chain	<ul style="list-style-type: none"> Working conditions Equal treatment and opportunities for all Other work-related rights 	<ul style="list-style-type: none"> The Bank makes a positive contribution by financing small and medium-sized enterprises (SMEs), which can create jobs and economic growth. Negative impacts can occur if human rights are not respected. 	<ul style="list-style-type: none"> Number of high-risk suppliers. Risk management processes. 	<ul style="list-style-type: none"> Inclusion and human rights policy Conflict of interest management policy
S4 – Consumers and end-users	<ul style="list-style-type: none"> Information-related impacts for consumers and/or end-users 	<ul style="list-style-type: none"> The Bank may be adversely affected by false or misleading information. Opportunity to create positive impact through access to finance for small businesses. 	<ul style="list-style-type: none"> Number of cases of noncompliance in product communications. Developing products with a sustainability focus. 	<ul style="list-style-type: none"> Information security policy Personal data policy
G1 – Responsible business conduct	<ul style="list-style-type: none"> Corporate culture Protection of whistle-blowers Corruption and bribery Cybersecurity and data privacy 	<ul style="list-style-type: none"> The Bank is at risk of bribery, corruption and cybersecurity incidents that could lead to negative impacts and financial risks. The Bank actively promotes an inclusive culture and good leadership. 	<ul style="list-style-type: none"> Number of cases of data breaches, bribery and discrimination. KYC compliance and implementation of climate/environmental risks in the lending process. Number of complaints regarding customer data and identity. 	<ul style="list-style-type: none"> Operational risk policy Risk policy Whistleblowing policy Inclusion and human rights policy

Sustainability risks

Identifying, measuring, managing and preventing sustainability risks is important from an economic and legal perspective, and also for Norion Bank's actions as a community stakeholder. These are also crucial for ensuring public confidence and our relationship with customers, investors and employees. Failing to manage our sustainability risks could ultimately have serious financial consequences for the Bank, and could also damage our reputation. Acting responsibly is therefore a prerequisite for long-term value creation at Norion Bank. Sustainability risks are risks that can be triggered by factors in the area of sustainability and that can negatively affect the Bank. The material sustainability risks the Bank has identified in the dual materiality analysis are related to corruption, working conditions in our own operations and in our value chain, and environmental risks such as climate⁶.

In our Risk policy, sustainability risk is categorized within the risk group business risk⁷. This involves how we as a Bank act and manage issues in the identified areas where we are able to make the biggest contribution to more sustainable development, for instance through responsible financing and lending,

by acting as a responsible employer, by combating financial crime, and by taking into account and acting on climate risks.

In all financial activities, there is a risk of corruption, which is therefore strongly regulated by law and practice for banking activities. We have a solid system for the combating of bribery, fraud, terrorist financing, money laundering and other forms of corruption within the Bank. In addition, continuous efforts are maintained to ensure cyber and data security and strong privacy protection for all customers.

All our customers are treated equally, and respect for human rights guides our treatment of the people we deal with. Our open-minded and accepting culture create opportunities to make the financial community more inclusive. At the same time, it is important to minimize the risk of over-indebtedness, not having enough financial information about loans and over-spending. We manage this daily in our contacts with customers through responsible lending and a strict customer due diligence process. Climate risks are an obvious risk to long-term business, not least for our corporate customers and their ability to continue to grow and prosper.

⁴ Includes categories from ERS thematic standards.

⁵ This is a summary of identified impacts, risks and opportunities. A complete list has been compiled as a result of the Bank's analysis.

⁶ Climate is categorized into physical and transition risks. See a more detailed description of the Bank's dual materiality analysis on page 121.

⁷ It is mainly in the sustainability policy and in the risk policy, that the Bank has chosen to formulate existing sustainability risks. See more information in the sustainability policy: www.Norionbank.se/om-bolaget/hallbarhet/hallbarhetsarbete.

As a financier, we have the opportunity to influence and work together with our customers to increase access to relevant data, but also by considering nature-related financial risks in business decisions.

Norion Bank has internal procedures and guidelines for how we evaluate ESG in the corporate credit portfolio. The guidelines include sector-specific risks, address physical and transition-related climate risks, and provide guidance to client executives on how to assess social and governance risks.

In 2024, a number of activities were carried out to strengthen our sustainability work and ensure higher transparency and quality in our ESG processes. One consequence of this is our improved performance in external ESG surveys, where we moved from the 59th percentile in 2023 to the 69th percentile in 2024 in S&P's ESG scoring – an increase of 10 percentage points compared to the industry. An improved ESG risk profile strengthens our position in the market.

We have also established a new sustainability monitoring function, which will review and approve all ESG risk assessments as of January 1, 2025. Through this action, we ensure that ESG factors are taken into account in a consistent and rigorous manner, contributing to more robust decision-making for lending and financial assessments.

To safeguard our main asset, which is our employees, Norion Bank has taken proactive steps to prevent work environment-related problems and promote good health. In 2024, we introduced holiday rotation, free medical check-ups, increased wellness allowances and lunch benefits for our staff. An ambassador group was established to create a close dialog with employees on our work climate. The management team carried out vision and strategy work and created the conditions for a structured process around performance management. We are proud that Norion Bank's benefits package has both improved and developed during the year.

Business-minded

By being business-minded, Norion Bank stands for responsible financing for both private and corporate customers. Sound lending is based on a solid risk analysis in which ESG has a natural role to play. The Bank recognizes that the largest impact (both positive and negative) is attributable to the credit portfolio, and by systematically integrating sustainability into the credit process, we can contribute to reducing climate emissions and increasing respect for human rights.

Committed

As an employer, Norion Bank is responsible for ensuring that all its employees are treated equally and with respect. We work proactively to achieve equal levels of remuneration and equal proportions of women and men in management, on the Board, and among the company's employees. Everyone should feel included and be given the same opportunities to achieve professional and personal development.

Caring

Norion Bank's climate and environmental work is based on the precautionary principle and fulfilling commitments to sustainable finances while taking account of climate risks. The Bank's main climate impact comes from the activities of our corporate clients and the real estate it finances. Norion Bank's largest climate impact is therefore via our customers in the Corporate and Real Estate segments through financed emissions. We have established internal processes to identify climate risks, are committed to contributing to the climate transition, and maintain continuous dialog with our stakeholders.

Fraud is a growing challenge that Norion Bank is actively working to counter. During the year, we have been involved in Swindled, an initiative that raises awareness of fraud and gives people the tools to protect themselves. We counter this through a combination of prevention, training and technological development, creating a safer banking experience and helping our customers resist fraud attempts. Through our partnership with SvårLurad, we continue to work towards a safer and more resilient society, where more people can feel safe in their everyday lives.



Business-minded

Through its professionalism, Norion Bank stands for responsible financing for both private and corporate customers. Sound lending is based on a solid risk analysis in which ESG has a natural role to play. In 2024, the Bank continued its efforts to classify the corporate portfolio in order to analyze our corporate customers' current carbon footprint and future transition plans. The ambition for the year's figures is that they should establish a baseline for Norion Bank's green credits.

Sustainability monitoring in the corporate portfolio*	2024	2023	2022
Percentage of total credit score systematically reviewed for sustainability	84%	41%	21%

* "Corporate portfolio" refers to the credit portfolio in the Corporate and Real Estate segment.

Financing in green categories*	2024	2023
Financing in green categories (SEK billion)	5.3	4.8
Of which green buildings (SEK billion)	4.3	4.8

* "Green categories" refers to what is formulated in the Bank's Green Framework: Green buildings, energy efficiency, renewable energy, clean transport, climate adaptation and circular economy.

Committed*

As an employer, Norion Bank is responsible for ensuring that all its employees are treated equally and with respect. The Bank works proactively to achieve equal levels of remuneration and equal proportions of women and men in management, on the Board, and among the company's employees.

	2024
% Participation in appraisal interviews	88%
Of which % are men	n/a
Of which % are women	n/a
Of which % are not employed	100%
Total appraisal interviews	324
Appraisal interviews per employee	0.81
% of confirmed appraisals during the year	92%

	2024
Average hours of training per female employee	5.64
Average hours of training per male employee	5.53
Average hours of training per other employee	n/a
Average hours of training per employee with non-reported gender	1.68
Average hours of training per employee	7.25
Average hours of training per non-employee	2.69

	2024	2023	2022
Incidents of discrimination and harassment	3	1	1
Complaints submitted through established procedures	0	1	0
Number of complaints lodged with OECD National Contact Points for multinational enterprises	0	0	0
Serious human rights incidents linked to the workforce	0	0	0
Number of serious human rights cases where the company was involved in ensuring action	0	0	0

	Number of employees (FTE)*		
	2024	2023	2022
Total employees**	398	343	308
Men	240	189	166
Women	154	154	142
Others	0	0	0
Not reported	4	0	0

*FTE means Full-Time Equivalent. The proportion of permanent and probationary employees was 89% (81%) in 2024. The average is calculated per country.

	Number of employees (FTE)		
	2024	2023	2022
Sweden	364	306	271
Finland	20	25	26
Norway	14	13	12

	2024				
	Women	Men	Others	Not reported	Total
Number of employees (FTE)	170	256	0	4	430
Number of permanent employees (FTE)	144	236	0	4	384
Number of temporary staff (FTE)	10	4	0	0	14
Number of on-demand employees (FTE)	16	16	0	0	32
Number of full-time employees (FTE)	149	238	0	4	391
Number of part-time employees (FTE)	5	2	0	0	7

	2024	2023	2022
GENDER DISTRIBUTION			
Women in leadership positions	5 (42%)	4 (36%)	4 (33%)

	DISTRIBUTION OF EMPLOYEES BY AGE GROUP		
	2024	2023	2022
Below the age of 30	27%	29%	29%
Between 30–50 years of age	62%	61%	60%
Aged over 50	11%	10%	11%

	2024	2023	2022
Staff turnover (%)	11	14	18
Number of employees who left*	45	101	105

* Includes general fixed-term and hourly employees.

	2024
Total number not employed	42

	2024
% of workforce covered by HS management system	100%
Number of deaths:	
Employees	0
Workers in the value chain In own facilities	0

* The Committed focus area corresponds broadly to CSRD S1 – Own workforce. A transition to ESRS reporting implies a change in data collection, which means that some data is not available for reporting.

	2024
Number of registered work-related accidents	6
Number of registerable work-related accidents	8
Work-related sickness:	
Employees	6
Nonemployees	0
Days lost due to work-related injuries, illness, accidents and death:	
Employees	558
Nonemployees	0
	2024
% OF EMPLOYEES PAID BELOW MARKET PRACTICE	
Total employees	0%

	2024
Total not employed	0%
	2024
Employees entitled to family-related leave	100%
Eligible employees who took family leave	26%
Of which % were men	22%
Of which % were women	32%
	2024
Aggregate gender pay gap (%)	15%
Annual total remuneration (%)	71%

Caring*

Norion Bank's focus on being caring means that we have a structured and transparent way of working, which is a prerequisite for good business ethics and lasting success that contributes to long-term sustainable social development. The Bank's climate and environmental work is based on the precautionary principle and fulfilling commitments to sustainable finances while taking account of climate risks.

In 2024, Norion Bank audited and measured its carbon footprint. For 2024, Norion Bank has revised and measured the carbon footprint for all relevant Scope 3 categories identified in the mapping from the previous year. The Bank reports for the year categories not previously measured, which explains the significant increase. Emissions financed through the Bank's loan portfolio are reported separately on page 40.

Anticorruption	2024	2023	2022
Number of incidents of corruption	0	0	0

Marketing and labeling	2024	2023	2022
Number of cases of noncompliant product and service information and labeling	0	0	0
Number of cases of noncompliance in marketing communications*	0	1	0

*In one case, the Swedish Consumer Agency has criticized Norion Bank's design of invoices for the business segment Walley and credit card invoices for private customers. The Bank has rectified the deficiencies highlighted by the Consumer Agency and the case has therefore been closed without any action being taken against the bank.

Customer privacy	2024	2023	2022
Number of cases of breaches relating to personal privacy violations	0	0	0
Number of complaints reported (materially important incidents)	3	2	0

Socio-economic compliance	2024	2023	2022
Number of cases of significant fines or penalties for breaches of the laws and regulations applicable to the organization	0	0	0

Energy consumption, kWh	2024	2023	2022
Electricity	267,848	271,540	266,033
District heating	272,392	337,493	316,533
Air conditioning	27,951	29,609	14,908
Total energy use	568,191	638,642	582,581

Greenhouse gas emissions, tons CO ₂ e	2024	2023	2022
Scope 1	0.5	0.3	1.1
Scope 2 (market-based)	19.0	25.0	52.0
Scope 2 (location-based)	15.2	21.8	17.7
Scope 3	3,113.6	901.2	186.2
Total greenhouse gas emissions*	3,148.3	926.5	239.3

*The reported Scope 3 emissions increased significantly for 2024. This is a result of the Bank having measured all relevant categories, as well as high data uncertainty due to a large number of cost-based emission factors in categories 1 and 2. The main contributors to the increase are operational expenditure, purchased goods and services.

*The focus area Caring corresponds within CSRD to some extent to G1 – Business conduct.

The greenhouse gas emission projections for 2024 are based on the Greenhouse Gas Protocol (GHG Protocol) framework. GHG emissions are broken down into Scope 1 (company cars), Scope 2 (electricity, district heating and cooling for offices) and Scope 3 (data centers, purchase of goods and services, upstream transportation and distribution, use of products sold, business travel and hotel nights). The calculation methodology for GHG emissions from data centers is based on life cycle assessments, where information on usage and conversion factors is taken directly from Norion Bank's supplier.

The other sources of conversion factors are: AIB, DEFRA, Exiobase Energiföretagen, NTM and Statistics Sweden.

Emission intensity*	2024	2023	2022
CO2 emissions per FTE	7.91	2.70	0.78

* Excludes the Bank's financed emissions (category 15 under the GHG protocol). The calculations for the years 2022 and 2023 have been updated to take more Scope 3 categories into account.

Norion Bank's initial alignment with sustainability reporting in accordance with ESRS standards S1 and G1

For the 2024 reporting, we are taking further steps in our sustainability work by including information in the areas of Own workforce (S1) and Business conduct (G1). Although we do not intend to report fully under ESRS, we see the value in making a first effort to report on these aspects and thereby strengthen our transparency and reporting on sustainability.

By integrating S1 and G1 in our reporting, we create a clearer picture of how we work with employee issues, diversity, business ethics and compliance. This report is a step towards a more comprehensive sustainability report that reflects our responsibility and contribution to a sustainable financial sector.

The disclosure of information related to S1 and G1 is based on the result presented in the double materiality analysis (see page 121) related to material impact, risks and opportunities. The following section deals only with the issues of own workforce (S1) and Business conduct (G1).

Significant impacts, risks and opportunities

SBM-3 Material impacts, risks and opportunities and their relationship to business model and strategy

Norion Bank conducted a resilience analysis of its strategy and business model to assess our ability to manage material impact and risk and to seize strategic opportunities. The analysis categorized Norion Bank's material IROs based on conceptual themes and analyzed how these integrate with our business model, strategy and value chain. The analysis was conducted in dialogue with key internal stakeholders who analyzed how each theme could potentially impact Norion Bank, our current strategic actions and level of ambition for each area. Based on an aggregation of these factors, conclusions were drawn for each theme on a scale from low to high resilience.

Resilience of impacts, risks and opportunities related to own workforce

Norion Bank has conducted a resilience analysis of its strategy and business model in relation to diversity, equality and inclusion, and occupational health and safety. The analysis aims to identify the bank's ability to manage risks and seize opportunities related to these areas, and to assess potential impacts on its operations and stakeholders.

The analysis shows that Norion Bank demonstrates a high degree of resilience in diversity, equality and inclusion. The Bank has established a clear policy of inclusion and zero tolerance of discrimination and harassment, supported by internal training and continuous monitoring. By actively working towards an inclusive workplace, investing in employee skills development and promoting work-life balance, Norion Bank creates long-term

value for both the Bank and its employees. Regular employee surveys and analysis of key performance indicators enable identification of areas for improvement and ensure continuous development. Furthermore, the analysis indicates that Norion Bank has strong resilience in occupational health and safety. The Bank works proactively to reduce stress-related illness through regular health checks and management training. A structured approach to health and safety, combined with initiatives to promote well-being, strengthens both employee engagement and the long-term competitiveness of the organization. By ensuring good working conditions, systematically monitoring sick leave, and analyzing work environment indicators, Norion Bank creates a healthy and sustainable workplace.

Resilience of impacts, risks and opportunities related to business conduct

The resilience analysis covered Norion Bank's strategy and business model in relation to regulatory and compliance risks, anti-corruption and ethical business practices, as well as whistleblower protection and corporate culture. The aim was to assess the Bank's ability to maintain compliance, manage risks and promote a strong ethical corporate culture. The analysis shows that Norion Bank has robust processes to manage regulatory and compliance risk. The Bank has established internal controls and a structured risk management process in which the Regulatory Compliance and Risk Control functions work together to monitor new regulations. Proactive measures, such as regular training, a strict approval process for new products and the updated Red List to minimize sustainability risks, ensure that Norion Bank maintains a high level of compliance and strengthens the trust of customers and investors.

In the area of anticorruption and ethical business, Norion Bank has a clear zero-tolerance approach to bribery and financial crime. The company provides systematic anticorruption training, has implemented a whistleblowing function, and monitors incidents to ensure compliance with its policy. By investing in an open and transparent corporate culture where employees are encouraged to report misconduct, Norion Bank strengthens its ethical leadership and long-term business value.

Finally, the analysis has identified that Norion Bank has a well-functioning whistleblowing function that ensures that employees can report potential irregularities without risk of retaliation. The company continuously works to promote a culture of openness and fairness, with leadership training and culture improvement initiatives helping to strengthen internal compliance. Regular follow-up of whistleblower reports enables continuous improvement and strengthens the Bank's resilience to potential ethical and legal risks.

S1 – Own workforce

SBM-3 Material impacts, risks and opportunities and their relationship to business model and strategy

In the definition of “Own workforce”, Norion Bank includes all employees who can be significantly affected by the business. This includes both permanent and fixed-term employees of the Bank, as well as agency staff who work for the Bank but are not directly employed. Norion Bank works actively to offer an attractive workplace with a good work-life balance and competitive employment conditions. In some areas, competition for skilled workers can lead to some cost pressures. We identify employment security, fair wages, gender equality, equal pay and diversity as key sustainability issues. These areas are central to our long-term success and to our ability to remain a responsible and attractive employer.

Description of the impact, risk or opportunity	Impact/risk/opportunity	Value chain			Time horizon		
		Upstream	Own activities	Downstream	Short	Medium	Long
Promoting gender equality and inclusion	Positive impact		x		x	x	x
Skills development	Positive impact		x		x	x	x
Risk of discrimination	Negative impact		x		x	x	x
Unadjusted wage differentials	Risk		x		x	x	x
Ensuring equal opportunities	Opportunity		x		x	x	
Norion Bank's work environment and working conditions	Positive impact		x		x	x	x
Health and safety at work	Negative impact		x		x	x	x
Opportunities for workers	Positive impact		x		x	x	x
Challenges in finding the right talent	Risk		x		x	x	
Creating good working conditions through initiatives and benefits	Opportunity		x		x	x	x
Risks of inadequate management of working conditions	Risk		x		x	x	

Management of significant impacts, risks and opportunities

S1-1 – Policies related to own workforce

Norion Bank strives to create a work environment characterized by respect, inclusion and fair working conditions. The Bank has implemented clear policies and guidelines to ensure that all employees are treated equally, work in safe conditions, and have the opportunity to develop within the organization. These policies cover human rights, health and safety, equal treatment and antidiscrimination and apply to the whole Bank, including its branches.

The Bank actively seeks to identify, manage and prevent risks and adverse effects on the workforce through systematic processes and clear lines of responsibility. The Board of Directors has overall responsibility for ensuring that these policies are complied with and continuously updated in accordance with applicable legislation and international standards.

Human rights

Norion Bank actively promotes inclusion, diversity, equality and a work environment free from discrimination. The Bank's operations are based on respect for human rights and zero tolerance of abuse, harassment and bullying, both internally and in external business relationships.

To ensure that these values permeate the entire organization, Norion Bank has implemented an Inclusion and Human Rights Policy, which applies to the entire Bank, including its branches. The policy is available to all employees via the company intranet.

Norion Bank ensures that its operations do not contribute to human rights violations and works actively to prevent such violations in all business areas and processes. The Bank follows international guidelines such as:

- UN Guiding Principles on Business and Human Rights
- ILO Core Conventions on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises
- UN Global Compact, in which Norion Bank has committed to the ten principles of human rights, labor, environment and anticorruption.

As part of this work, the Bank has also signed the UN Principles for Responsible Banking (PRB), which means that the Bank integrates the Paris Agreement and the UN Sustainable Development Goals (SDGs) into its objectives and business processes.

Norion Bank has zero tolerance for child labor, forced labor and human trafficking and actively works to eliminate all forms of discrimination. The Bank respects employees' right to freedom of association and works to ensure fair working conditions.

Health and safety

Norion Bank's Health and Safety Policy aims to ensure a safe and healthy work environment by preventing illness and accidents caused by organizational, social or physical factors.

The Bank's work environment management is systematic and includes:

- Regular risk assessments and measures to prevent work-related accidents and diseases.

- Clear division of responsibilities and delegation of health and safety tasks within the organization.
- Collaboration between managers and employees to create a safe and pleasant work environment.

Norion Bank has established social, organizational and physical work environment objectives, which include:

- Zero tolerance of bullying, harassment and discrimination.
- Drug-free work environment.
- Reasonable requirements and healthy workload.
- Clear leadership and governance.
- Safe work environment with the right tools.
- An open climate where everyone respects each other.

To ensure the work environment when working remotely, Norion Bank has developed guidelines for how the systematic work environment management is also applied outside the physical workplace.

Equal treatment and opportunities for all

Norion Bank has a zero tolerance policy against discrimination, harassment, victimization and bullying, both within the organization and in external business relationships.

To combat discrimination, Norion Bank works with:

- Structured and competence-based recruitment, where the individual's overall competence is decisive in employment decisions. The recruitment process is free from discrimination based on gender, ethnicity, religion, age, disability, sexual orientation, gender identity or gender expression.
- Active antidiscrimination measures, where working conditions, pay, recruitment, promotion and skills development are regularly reviewed.
- Equal opportunities for training and skills development for both men and women.
- Work to facilitate work-life balance through flexible work hour arrangements.

The Bank's Remuneration Policy is gender-neutral and ensures that equal pay is given for equal or equivalent work. Pay criteria are clearly defined and based on factors such as business minded, commitment, performance and quality.

To ensure that all employees feel safe and respected, Norion Bank has clear procedures for handling complaints and reporting grievances. If an employee experiences discrimination or harassment, or sees a colleague being victimized, there is an obligation to report this to the Chief HR Officer, who is responsible for investigating the situation and taking the necessary action.

Dialogue with own workforce

S1-2 – Procedures for contacting employees and their representatives regarding consequences

Norion Bank is convinced that an open and inclusive dialog with employees and their representatives is key to a sustainable and attractive workplace. By continuously engaging its own workforce on issues related to the work environment, working conditions and career development, it creates a culture of participation, security and transparency.

The Bank strives to empower its staff and give them the opportunity to influence decisions that affect their working lives. This is done through structured dialogues, regular employee surveys and collaboration with trade unions. Norion Bank also works actively to ensure that all employees have access to fair and equal working conditions, skills development and a good work environment.

As a responsible employer, Norion Bank promotes an open and inclusive culture, where management and employees work together to identify and manage risks, opportunities and potential impacts on the workforce. This work is in line with the Bank's overall sustainability strategy and international guidelines such as the ILO conventions on Freedom of Association and Protection of the Right to Organize.

By strengthening the dialogue with its own workforce, Norion Bank creates a long-term and sustainable work environment, where employee engagement and well-being are central to the success of the business.

S1-3 – Processes to remediate negative consequences and channels for own workers to raise concerns

Norion Bank is committed to maintaining an open, ethical and transparent work environment, where employees feel safe to report misconduct and have their views heard. To ensure this, the Bank has established clear processes and channels for handling complaints and reporting potential irregularities.

The Bank's handling of complaints and whistleblowing is based on fairness, confidentiality and protection of the whistleblower, in accordance with Norion Bank's Code of Conduct and Whistleblowing Instruction. The Bank also adheres to international guidelines such as the ILO Conventions and the UN Guiding Principles on Business and Human Rights, ensuring that all employees have access to fair and safe processes for raising complaints and having them dealt with effectively.

Norion Bank has implemented several channels for employees to make complaints or report grievances. One of the primary channels is the Bank's external whistleblowing system provided by 2Secure. This system is available to both employees and external whistleblowers and guarantees anonymity for the reporter. In addition, employees can always turn to their line manager or, if necessary, their manager's manager to raise their questions and concerns. If necessary, the Bank's HR or Compliance function can also be contacted directly to ensure that the case is handled correctly. If a complaint is deemed to be whistleblowing, Norion Bank's Whistleblowing Committee, chaired by the Compliance function, is convened to evaluate the case and decide on the necessary actions. If the complaint is not classified as whistleblowing, it is handled according to the Bank's internal processes, with the HR function playing a central role in most cases to ensure fair and effective handling. These procedures are clearly described in Norion Bank's Code of Conduct and Whistleblowing Instruction, which are available to all employees via the Bank's intranet.

In order to manage any negative consequences that may arise from business decisions or processes, Norion Bank has established governing policies and instructions, as well as supporting processes and tools. If the Bank identifies that it has caused or contributed to a material adverse impact on an employee or the workforce as a whole, corrective action is taken to remedy the situation. These measures may include internal investigations, disciplinary action, support and resources for the staff members concerned, and improvement of internal procedures to prevent similar incidents in the future.

To ensure that all employees are aware of and have confidence in these structures, Norion Bank has integrated information on whistleblowing and complaint handling into its mandatory corporate training. Furthermore, both the Code of Conduct and the Whistleblowing Instruction are easily accessible on the intranet and are regularly communicated through internal channels. The Bank strives to create a culture where employees feel safe to report misconduct and where their concerns are handled confidentially, fairly and promptly.

Through these processes, Norion Bank ensures that its own workforce has effective and safe channels for raising complaints and that any negative consequences are handled in a responsible and structured manner.

S1-4 Actions on material consequences for own workforce and approaches to reducing material risks and pursuing material opportunities related to own workforce, and the effectiveness of those actions

Norion Bank works systematically to identify, prevent and address potential negative consequences for the workforce and to strengthen the work environment and leadership. Through employee surveys twice a year, dialogue between HR, managers and employees, and concrete action plans, the Bank ensures that working conditions develop positively.

The results of employee surveys are communicated at staff meetings and through managers' briefings to teams to ensure transparency and participation. Norion Bank has also created an annual cycle of activities for staff and managers, as well as an ambassador group that captures both well-being factors and challenges in the organization.

To ensure the effectiveness of the interventions, they are followed up in subsequent staff surveys. Through annual plans, leadership meetings and continuous dialog, the Bank actively promotes a safe, inclusive and engaging work environment.

Metrics and targets

S1-6 Characteristics of the Undertaking's Employees

Norion Bank discloses information on the size and composition of its workforce to ensure transparency and clarity on the Bank's staff structure. The information covers both permanent employees and other forms of employment, providing a representative picture of the workforce and its evolution over time.

The calculation of full-time employees (FTE) excludes hourly paid employees, but their numbers are reported separately to give a more complete picture of the workforce. The Bank's reporting of staff data is designed to be as clear and comparable as possible, in line with both internal and external reporting requirements.

The figures presented for employees and the composition of the workforce also reflect the most representative figure in the Bank's financial reporting of staff-related costs and commitments (see page 80).

Detailed information on the structure of the workforce, including forms of employment and distribution, is presented on page 124.

Employee turnover

S1-7 Data on nonemployees in the Bank's own workforce

Norion Bank reports information on nonemployees in the workforce to provide an overall picture of the resources that contribute to the business. The Bank cooperates with consultants in Corporate Banking, particularly in the real estate business, and in IT and systems development. In addition, external specialists are engaged for project management and AntiMoney Laundering (AML) work.

These nonemployees have a fixed-term or mission-based relationship with the Bank and are used to ensure specialist expertise and flexibility in critical business areas. Detailed information is presented on page 124.

S1-9 Diversity metrics

Norion Bank strives to create an inclusive and diverse workplace, where all employees have equal opportunities to develop

and contribute to the business. The Bank actively works to ensure gender balance, representation of diverse backgrounds, and a work environment free of discrimination. By continuously monitoring and analyzing diversity data, Norion Bank ensures that the work on inclusion and gender equality is developed in line with the Bank's values and sustainability goals. Detailed information is presented on page 124.

S1-10 – Adequate wages

Norion Bank ensures that all employees receive a salary that at least corresponds to adequate and fair remuneration in accordance with market practice. The Bank regularly monitors salary levels to ensure that remuneration is competitive and contributes to a sustainable and financially secure work environment for all staff. Detailed information is presented on page 125.

S1-13 Training and skills development metrics

Norion Bank continuously invests in training and skills development to ensure that employees have the knowledge and skills required to meet both current and future challenges. Through structured training programs, leadership development and professional upskilling, the Bank promotes a learning and dynamic work environment, where staff are given the opportunity to develop and grow within the organization. Detailed information is presented on page 124.

S1-14 – Health and safety metrics

Norion Bank works actively to ensure a safe and healthy work environment for all employees. Through systematic work environment management, regular risk assessments and health promotion initiatives, the Bank strives to prevent illness and accidents and to create a sustainable work environment where employees are happy and can perform at their best. Detailed information is presented on page 125.

S1-15 – Work-life balance metrics

Norion Bank strives to create a sustainable work environment where employees can maintain a healthy work-life balance. Through flexible working arrangements, clear guidelines on work hours and initiatives to promote well-being, the Bank ensures that staff are able to combine their professional lives with their personal needs and commitments.

All staff are covered by parental and other forms of family leave, enabling a safe and inclusive workplace where individual needs are respected and supported. Detailed information is presented on page 125.

S1-16 – Remuneration metrics (pay gap and total remuneration)

Norion Bank ensures a fair and transparent remuneration structure, where salaries and benefits are set on the basis of market criteria and on the principle of equal pay for equal work or work of equal value. The Bank regularly monitors remuneration levels to ensure competitive and fair salaries within the organization. Detailed information is presented on page 125.

S1-17 – Incidents, complaints and severe human rights impacts

Norion Bank strives to maintain a respectful and safe work environment, free from discrimination, harassment, bullying and victimization. To ensure this, the Bank has a zero-tolerance policy and clear procedures to identify, manage and address any incidents.

All employees have a responsibility to know and act in accordance with Norion Bank's Code of Conduct, which summarizes

the rules, values and guidelines that govern our work for an ethical and inclusive corporate culture. Employees are expected to report suspected violations, including criminality or deviations from the Code of Conduct, through the internal reporting channels.

If an employee feels discriminated against or harassed, or sees that a colleague or external contact is being treated inappropriately, they have a responsibility to act by contacting the Chief HR. HR is responsible for investigating the situation and, in consultation with the parties concerned, creating an action plan for the necessary measures.

During the current reporting period, no ongoing cases of discrimination or harassment have been identified within the Bank. Three previous incidents have been reviewed and are no longer subject to further action.

Norion Bank wants to live up to the expectations of customers, owners and employees and ensure a work environment characterized by openness and trust. Our incident management follows an established process that ensures we take responsibility for our actions and create a workplace where all employees feel safe and included. Detailed information is presented on page 124.

G1 Business conduct

SBM-3 Material impacts, risks and opportunities and their relationship to business model and strategy

Norion Bank strives to conduct business in a way that combines business minded with responsibility. As a business-oriented Nordic financing bank, we play a central role in enabling sustainable growth for our customers and contributing to a stable and well-functioning financial market. We see corporate responsibility as an integral part of our business model and integrate sustainability into our operations by ensuring good governance, transparency and compliance.

Our work on corporate responsibility is based on three core principles: business minded, committed and caring. We apply strict ethics and compliance policies to prevent financial crime, ensure customer integrity and strengthen trust in our services. As part of this, we work actively on compliance, risk management and sustainable lending to reduce both financial and sustainability-related risks.

Description of the impact, risk or opportunity	Impact/risk/opportunity	Value chain			Time horizon		
		Upstream	Own activities	Downstream	Short	Medium	Long
Opportunity to freely express opinions	Positive impact		x		x	x	x
Laws and regulations affecting business operations	Risk		x		x	x	
Preventing money laundering and other forms of corruption	Positive impact	x	x	x	x	x	x
Risk in case of deficiencies in internal processes and mechanisms	Risk	x	x	x	x	x	x
Shortcomings in ensuring whistleblower protection	Risk		x		x	x	

Impacts, risks and opportunities management

G1-1 Business ethics policies and corporate culture

Norion Bank has established clear policies and guidelines to ensure ethical, responsible and transparent business behavior. The Bank's efforts to manage material impacts, risks and opportunities in corporate responsibility are governed by several governing documents, including the Conflict of Interest Policy and the AntiCorruption Policy, which complement the Bank's Code of Conduct.

These policies ensure that Norion Bank acts in accordance with the UN Global Compact, the Code against Corruption in Business and the provisions of the Criminal Code on bribery. The Board of Directors has the ultimate responsibility for establishing and updating these policies and ensuring compliance throughout the organization.

Corporate culture

Norion Bank has a publicly available Code of Conduct that applies to all employees and sets out the Bank's basic ethical principles. The Code is based on the ten principles of the UN Global Compact and defines the Bank's expectations of employee behavior, both internally and in external relations.

The Code of Conduct makes it clear that Norion Bank has zero tolerance for victimization, harassment, bullying and discrimination. It also provides guidance on how staff should deal with situations related to conflict of interest, corruption and bribery.

The Bank evaluates its corporate culture through annual employee surveys, where a high and continuously climbing eNPS (Employee Net Promoter Score) shows that Norion Bank's work for a strong corporate culture is paying off.

Whistleblower mechanisms

To ensure an open and transparent reporting culture, Norion Bank has established an external whistleblowing channel, which enables anonymous reporting of suspected irregularities and deviations from the Code of Conduct.

In addition to the whistleblowing system, the Bank's CEO has set up an Ethics Committee (EC) responsible for

- Managing and evaluating incoming reports in accordance with the Bank's anticorruption policy
- Ensuring that reported incidents are followed up and that the necessary measures are taken.
- Reviewing compliance with the Bank's Code of Conduct and, where needed, recommending improvements.

Training for anticorruption corporate conduct

Norion Bank has a training policy to ensure that all employees have a good understanding of ethical guidelines, anticorruption and corporate responsibility.

- Upon recruitment, all employees must undergo training on the Code of Conduct and anticorruption.
- Annual mandatory training is carried out to ensure continuous knowledge and understanding of the regulatory framework.
- The trainings provide practical examples and guidelines to help staff identify and manage conflicts of interest, bribery and unethical business practices.

These efforts strengthen Norion Bank's corporate culture and minimize the risks of breaches of ethical guidelines.

Anticorruption and bribery

Norion Bank has an anticorruption policy that defines how the Bank works to identify and prevent corruption, conflicts of interest, bribery and nepotism. The policy builds on the Business Code of Conduct and the UN Convention against Corruption, and sets out clear guidelines for:

- Management of conflicts of interest, including documentation and reporting.
- Rules on gifts and benefits, to ensure that these do not pose a risk of bribery.
- Use of intermediaries, where high ethical standards are expected of external partners.

The Bank's Ethics Committee (EC) is responsible for investigating and dealing with suspected cases of corruption or other breaches of business ethics.

Although no specific risk group has been defined, senior managers and members of the Bank's management team are considered to be particularly exposed to risks related to corruption and bribery.

Norion Bank follows a consistent and independent process to investigate suspected incidents of business ethics violations, including corruption and bribery. The Bank has implemented strict control mechanisms to ensure that all employees and business partners act in accordance with the applicable regulations and internal policies.

G1-3 – Prevention and detection of corruption and bribery

Norion Bank has established structured processes to prevent, detect and manage corruption and bribery in its operations. The Bank's AntiCorruption Policy is formulated in accordance with the Code against Corruption in Business ("Business Code"), which supplements the provisions of the Criminal Code on bribery (Chapter 10, Sections 5a–e). The policy sets out clear guidelines and measures to minimize the risk of corruption-related incidents and ensure that business activities are conducted in an ethical and transparent manner.

As part of the Bank's preventive work, annual risk analyses are carried out to identify and assess corruption risks and determine appropriate measures to address them. The Bank has also set up a benefits register where all gifts and benefits given, offered or not accepted must be reported. The aim is to ensure transparency and reduce the risk of conflicts of interest and undue influence. All staff members are required to follow these guidelines and report their transactions in the register.

In order to raise awareness and ensure that all employees understand the regulations, Norion Bank conducts mandatory anticorruption training. All new employees are trained in the AntiCorruption Policy and the Code of Conduct at the start of their employment, and all employees complete annual digital training on the subject.

Norion Bank's CEO has also established an Ethics Committee (EC), which is responsible for handling and investigating suspicions of corruption. The Committee consists of the CEO, the Chief Sustainability Officer, the Head of CEO Office, the Chief HR Officer and the Head of Compliance, but may be expanded to include other functions, depending on the nature of the case. If necessary, the CEO has the possibility to elevate matters to the Board of Directors for further decision-making. Corruption investigations are conducted independently of the functions and persons who may be involved in the matter, to ensure objectivity and rule of law.

To maintain transparency and accountability, the General Counsel presents the Bank's antibribery and corruption work to the Board annually. If serious incidents or deficiencies are detected, these are immediately reported to the CEO. Minutes of the Ethics Committee meetings are documented and made available to the Governing Board, which may request further transparency and action if necessary.

The Bank's AntiCorruption Policy and AntiCorruption Instructions are available to all employees on the intranet, and all employees undergo annual training to ensure understanding and compliance. To strengthen transparency towards external stakeholders, the AntiCorruption Policy is also published on the Bank's website, making the information available to the public and investors.

Through a combination of risk analysis, transparency in benefit registration, continuous training and an independent investigation function, Norion Bank ensures that anticorruption and antibribery work is an integral part of the business and contributes to a sustainable and responsible business culture.

Metrics and targets

Anticorruption and bribery

G1-4 – Confirmed cases of corruption and bribery

Norion Bank has not had any confirmed cases of corruption or bribery in its operations during the current reporting period. Nor has the Bank received any convictions or fines for breaches of anticorruption and bribery laws.

As no incidents have occurred, there has been no need to take action to address breaches of the Bank's anticorruption procedures and standards. Furthermore, no employees have been dismissed or disciplined due to corruption-related incidents, and no business relationships have been terminated or not renewed due to breaches of anticorruption rules.

Norion Bank continues to work proactively on preventive measures, including mandatory training, risk analysis and strict compliance with the AntiCorruption Policy, to ensure business operations free from corruption and unethical behavior.

Accounting policies

Social – S1

Norion Bank applies a systematic approach to collecting, analyzing and reporting data related to its workforce. Reporting is based on data at the end of the reporting period and uses FTE (Full-Time Equivalent) as the calculation method. FTE is defined by summing the employment rate of each employee, excluding wage-earning employees and excluding employees on long-term leave. Two employees working 50% each count together as one FTE.

For staff turnover, a calculation method is used whereby the number of probationary and permanent contracts terminated during the period is divided by the average number of probationary and permanent staff at the beginning and end of the period. Based on this methodology, Norion Bank has a staff turnover of 11% in 2024.

Consultants are also reported in FTE and calculated on the basis of their employment rate. Two consultants working 50% each count together as one FTE. The Bank's HR system allows for an up-to-date overview of consultants' employment rates, where both HR and managers can record any changes.

When reporting age distribution, all employees are included in terms of actual headcount. The Bank's management team is defined as "top management" in the reporting. For salary data, market data from the Bank's system provider for salary mapping is used, where average salaries in Sweden are reported based on an analysis conducted in the fall of 2024. Separate salary surveys are carried out for Norway and Finland, and salary data are reported by country. As the majority of the Bank's employees are paid monthly, this is used as the basis for reporting.

When calculating salary differences between countries, the figures are adjusted for purchasing power differences, as pay in Norway is generally higher than in Sweden. The total remuneration ratio is calculated based on the salary data from the autumn salary survey, where the CEO is excluded and thus not counted as the highest paid.

Norion Bank ensures that all employees are covered by statutory insurance. Sickness absence and accidents at work are reported based on data from the payroll system and the incident reporting system. Work-related ill health is identified through reported incidents and cases where HR is aware of sick leave due to work-related stress, anxiety or worry, often in the context of a rehabilitation plan.

Parental leave is reported through data from the payroll system, where the calculation is based on how many men and women took one or more parental days during the year. All employees have the right to take parental leave.

When analyzing training hours, these are broken down by gender and consultants are included in the calculation based on an average number of consultants over the year. Performance appraisals are reported based on the number of appraisals signed, which in 2024 amounted to 88% of a total of 368 planned appraisals.

Data collection for employee surveys takes place annually and is used to monitor work environment, engagement and satisfaction. Norion Bank continues to develop its data collection and reporting to ensure a fair and transparent accounting of the composition and conditions of the workforce.

Business conduct – G1

The company reports information on business conduct in accordance with ESRS G1, which includes policies on responsible business conduct (business ethics) and the management of bribery and corruption. Incidents of bribery and corruption are identified through internal reporting and external notifications, and follow-up is done through the number of incidents resolved and internal investigations conducted.

When calculating business performance indicators, primary data from the company's internal reporting system is used. Reporting for 2024 does not include any cases of incidents of corruption or bribery, so the compilation of these KPIs is not relevant.

This report is Norion Bank's annual sustainability report, covering the calendar year 2024. The previous report can be downloaded at www.Norionbank.se and was published on March 30, 2024. More information about this report and sustainability at Norion Bank is available from the Chief Sustainability Officer Sarah Olofsson, sarah.olofsson@Norionbank.se

Auditor's opinion on the statutory sustainability report

To the AGM of Norion Bank AB (publ), corporate registration number 556597-0513.

Engagement and distribution of responsibilities

The Board of Directors is responsible for the sustainability report for 2024 on pages 120-132, and for its preparation in accordance with the Annual Accounts Act.

The focus and scope of the review

Our review was conducted in accordance with FAR's recommendation RevR 12 The auditor's opinion on the statutory sustainability report. This means that our review of the sustainability report has a different focus and a significantly smaller scope compared to the focus and scope of an audit in accordance with International Standards on Auditing and generally accepted auditing standards in Sweden. We believe that this review provides us with a sufficient basis for our opinion.

Opinion

A sustainability report has been prepared.

Stockholm, April 3, 2025
Ernst & Young AB

Daniel Eriksson
Authorized public accountant
Auditor in charge

