

Principles for **Responsible Banking**

Reporting and Self-Assessment Template

Principles for Responsible Banking





Reporting and Self-Assessment Template

The following template sets out the reporting and self-assessment requirements for Signatories of the Principles for Responsible Banking (PRB). Your bank discloses which actions it has undertaken to implement the PRB by self-assessing its progress on each of the 6 Principles. This template is therefore structured in accordance with the 6 Principles that signatories have committed to.

Three <u>Key Steps</u> are critical to showing that your bank is fulfilling its commitments as a signatory of the PRB, i.e. Impact Analysis, Target Setting & Implementation and Assured Reporting/Accountability. The sections in the Reporting and Self-Assessment Template that relate to the 3 Key Steps also require a self-assessment summary to demonstrate the extent to which the bank has fulfilled the respective requirements of the Key Steps.

Accommodating different starting points

Your bank has an initial four-year period from signing to implement the 6 Principles including to bring its reporting fully in line with the requirements. Your bank may not be able to provide all information required in this template in the first report. You should build on your implementation progress annually. Feedback, support, capacity building, training and peer learning are available to all signatory banks to help them progress with both implementation and reporting.

Timeline for reporting and assurance

Signatory banks need to report on their implementation of the Principles on an annual basis. The first PRB report has to be published within 18 months of signing the Principles, to give the bank some flexibility to align the PRB reporting with its reporting cycle. Publishing the first PRB report at any point earlier than 18 months after signing the Principles is therefore an option. After the first PRB reporting has been published, subsequent reports have to be published annually thereafter, i.e. within 12 months at the latest after the prior report¹.



Assurance

The last report within the initial 4 year implementation period (and subsequent reports thereafter) needs to be assured, which means that at least the third PRB report needs to be assured. Banks are encouraged to put the assurance process in place well before that and have earlier PRB reports already assured.

¹ Early reporting is permitted, although sufficient time to show progress from one year to the other should be taken into account.



All items that relate to the three <u>Key Steps</u> (highlighted in yellow) require limited assurance by year four of signing the PRB, undertaken by an independent third party with relevant expertise in the field. These are:

- 2.1 Impact Analysis
- 2.2 Target Setting
- 2.3 Target Implementation and Monitoring
- 5.1 Governance Structure for Implementation of the Principles

An assurer provides limited assurance of your self-assessment in these listed areas. You can do this by including it in your existing assured reporting. Where third-party assurance is not feasible, an independent review may be conducted. Assurance requirements are described in more detail in the Guidance for Assurance providers: Providing limited assurance for reporting.

Purpose of the template

The purpose of this template is to assist signatories in disclosing their progress on implementing the PRB. The disclosed information is used by the UNEP FI Secretariat as the basis for the individual review of each bank's progress, as well as for reporting the collective progress made by the PRB Signatory Group. To measure collective progress in a consistent manner, some standardized questions to be completed by the banks are integrated into the template. The open questions give banks the flexibility to disclose the progress they make, considering the diverse business models and various contextual differences in which banks operate.



How to use this template

This template gives banks the chance to provide summaries of the annual progress made in implementing each Principle. It is designed for your bank to provide references/links to where in your existing reporting/public domains (websites) the required information can be found to support your answers. The aim is to keep any additional reporting burden to a minimum while ensuring transparency and accountability as set out in Principle 6. When referring to other documents, please specify the pages where the exact information appears.

The Reporting and Self-Assessment Template shall not be amended structurally and content-wise. The content and text of the template can be applied to corporate layout and designed accordingly, without omitting parts of the texts. The Reporting and Self-Assessment Template can be integrated into your bank's reports (annual report, sustainability report or relevant reporting formats) or can be published as a stand-alone document. It needs to be publicly available and will be listed on the UNEP FI Signatories page.

The reporting needs to be published in English. Information that is referenced to within the Reporting and Self-Assessment Template should also be available in English. Where that is not possible, it is recommended to include the summary of relevant information as text in the Template, so that all necessary information can be taken into account when the UNEP FI Secretariat reviews the bank's performance.



Principle 1: Alignment



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

Business model

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

Sparebanken Sør is a regional savings bank, where the business model is an integrated value chain that includes the development, production and supplying of financial products and services. Distribution of products through owner companies and partners is an important part of the business model. Sparebanken Sør serves customers through a combination of sales offices and digital solutions. Digitalisation and an analytical approach characterise activities throughout the value chain. The largest business areas are Loans (to private and corporate markets) as well as Financing and Investment.

Sustainability report 2023, point 2.1, https://www.sor.no/gl obalassets/organisasi on/barekraft/2023sustainability-reportsparebanken-sor.pdf Annual report 2023, page 8 - 10, https://www.sor.no/gl obalassets/financialreporting/2023annual-reportsparebanken-sor.pdf



☐ Any applicable regulatory reporting requirements on environmental risk assessments, e.g.
on climate risk - please specify which ones: The Paris agreement
✓ Any applicable regulatory reporting requirements on social risk assessments, e.g. on

Any applicable regulatory reporting requirements on social risk assessments, e.g. on modern slavery - please specify which ones: - None of the above

The NorwegianTransparency Act - which safeguards the OECD's guidelines for multinational companies, UN's human rights including the ILO conventions etc. The law was established 1.of July 2022.

https://www.sor.no/fel les/omsparebankensor/samfunnsansva r/apenhetsloven/

Principle 2: Impact and Target Setting



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

2.1 Impact Analysis (Key Step 1)

Show that your bank has performed an impact analysis of its portfolio/s to identify its most significant impact areas and determine priority areas for target-setting. The impact analysis shall be updated regularly² and fulfil the following requirements/elements (a-d)³:

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

The bank's core business consists of lending, investments and, financing. All core areas are included in the impact analysis. In addition, the impact analysis covers important social areas and governance including purchasing. The bank updated the impact analysis in 2022 based on the principle of double materiality. We have started the process of updating the double impact analysis based on CSRD's guidelines, and plan to have this approved by the board Q3 2024.

Sustainability report, chapter 3.

- <u>b) Portfolio composition:</u> Has your bank considered the composition of its portfolio (in %) in the analysis? Please provide proportional composition of your portfolio globally and per geographical scope
 - i) by sectors & industries⁴ for business, corporate and investment banking portfolios (i.e. sector exposure or industry breakdown in %), and/or
 - ii) by products & services and by types of customers for consumer and retail banking portfolios.

² That means that where the initial impact analysis has been carried out in a previous period, the information should be updated accordingly, the scope expanded as well as the quality of the impact analysis improved over time.

³ Further guidance can be found in the <u>Interactive Guidance on impact analysis and target setting</u>.

⁴ 'Key sectors' relative to different impact areas, i.e. those sectors whose positive and negative impacts are particularly strong, are particularly relevant here.



b) Sparebanken Sør only operates in Norway and a relatively	
small region in Norway. The bank's market area is therefore	
defined as a common market area.	

- b)Annual report, page
- i)Sustainability report point 9.3, 10.2, 10.3 and 10.4
- ii) Annual report, notes 5, 10 and 29



<u>c) Context:</u> What are the main challenges and priorities related to sustainable development in the main countries/regions in which your bank and/or your clients operate?⁵ Please describe how these have been considered, including what stakeholders you have engaged to help inform this element of the impact analysis.

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

The two main challenges is climate emission and challenges relatet to the nature (biodiversity). Responsible (sustainable) products and services are a very central theme, but are a tools to safeguard goals related to climate and nature. We have not concluded what the third most important theme is, but it is probably financial crime. Economic crime is more of a compliance issue, which is heavily regulated by law.

Sustainability report chapter 3

Based on these first 3 elements of an impact analysis, what positive and negative impact areas has your bank identified? Which (at least two) significant impact areas did you prioritize to pursue your target setting strategy (see 2.2)6? Please disclose.

Climate:

Negativ impacts – climate emission from loan and investment portefolio.

Positiv impacts – Dialogue and exchange of expertise with customers, exclusion criteria and sustainable product to loan and investment customer

Nature:

Negativ impact – Customers use of natural areas and natural resources by loan and the investment portfolio.

Positiv impact – Products within the circular economy, exclusion criteria and dialogue and exchange of expertise with customers. Economic crime: Negative impact – if the bank's control routines and systems enable money laundering and financial crime. Positive – Impact by uncovering and reducing financial crime through continuous and systematic work on money laundering, terrorist financing, corruption and bribery.

https://www.sor.no/glo balassets/organisasjon /barekraft/2022-tcfdreport-sparebankensor.pdf

Sustainability report point 6.1 and chapter 12

https://www.sor.no/glo balassets/organisasjon /barekraft/2022-tcfdreport-sparebankensor.pdf

chapter 4 and 5

https://www.sor.no/glo balassets/organisasjon /barekraft/2023-07-05tnfd-reportsparebanken-sor.pdf chapter 4 and 5

https://www.sor.no/glo balassets/organisasjon /barekraft/2023sustainability-reportsparebanken-sor.pdf

⁵ Global priorities might alternatively be considered for banks with highly diversified and international portfolios.

⁶ To prioritize the areas of most significant impact, a qualitative overlay to the quantitative analysis as described in a), b) and c) will be important, e.g. through stakeholder engagement and further geographic contextualisation.



Chapter 5, page 20

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

In determining priority areas for target-setting among its areas of most significant impact, you should consider the bank's current performance levels, i.e. qualitative and/or quantitative indicators and/or proxies of the social, economic and environmental impacts resulting from the bank's activities and provision of products and services. If you have identified climate and/or financial health&inclusion as your most significant impact areas, please also refer to the applicable indicators in the Annex.

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

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

With regard to climate emissions, confers the TCFD report 2022. When it comes to nature, we assume that agriculture, forestry, fishing and aquaculture, property development and transport, due to the degree of dependencies, impact and lending volume, are the industries that have the greatest impact on the nature. The assumed most important areas of influence are land use and overuse of natural resources, confer TNFD report 2022.

KPI for climate emission, confer Sustainability report page, finn

TCFD rapport, chapter 4 and 5

https://www.sor.no/glo balassets/organisasjon /barekraft/2023-07-05tnfd-reportsparebanken-sor.pdf chapter 4 and 5

Scorecard section 2.3 and 3

Sustainability report chapter 9, 10 and 12



Self-assessment summary:				
Which of the following components of impact analysis has your bank completed, in order to identify the areas in which your bank has its most significant (potential) positive and negative impacts? ⁷				
Scope:			☐ In progress	□ No
Portfolio compo	osition:	⊠ Yes	☐ In progress	□ No
Context:		⊠ Yes		□ No
Performance m	easurement:	⊠ Yes		□ No
Which most signithe impact analys		s have you ide	ntified for your bank,	as a result of
Climate change mitigation, climate change adaptation, resource efficiency & circular economy, biodiversity, financial health & inclusion, human rights, gender equality, decent employment, water, pollution, other: please specify				
Confer: Sustainability report point 3.4				
How recent is the data used for and disclosed in the impact analysis?				
□ Up to 6 mo	nths prior to publica	ation		
□ Up to 12 m	onths prior to public	cation		
☑ Up to 18 m	□ Up to 18 months prior to publication			
□ Longer than 18 months prior to publication				
Open text field to describe potential challenges, aspects not covered by the above etc.: (optional)				

⁷ You can respond "Yes" to a question if you have completed one of the described steps, e.g. the initial impact analysis has been carried out, a pilot has been conducted.



2.2 Target Setting (Key Step 2)

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

The targets⁸ have to be Specific, Measurable (qualitative or quantitative), Achievable, Relevant and Time-bound (SMART). Please disclose the following elements of target setting (a-d), for each target separately:

<u>Alignment:</u> which international, regional or national policy frameworks to align your bank's portfolio with⁹ have you identified as relevant? Show that the selected indicators and targets are linked to and drive alignment with and greater contribution to appropriate Sustainable Development Goals, the goals of the Paris Agreement, and other relevant international, national or regional frameworks.

You can build upon the context items under 2.1.

Climate:

Target: TCFD report point 5.3

Framework: PCAF (We are part of a project group under the auspices of Finance Norway to adapt PCAF's framework to Norwegian conditions. The report is expected to be available in the end of may 2023.). In order to set emission trajectories in line with the Paris Agreement, we use CRREM methodology for residential and commercial real estate loans. We consider using other methodology, for example Sciance Based Targets for other industry.

Nature:

In terms of setting targets for nature, there is a need to carry out a more thorough analysis of industries and impact. We havel establish exclusion criteria linked to nature-related risks by 2023, confer "Responsible lending policy.

We have also integrated risk assessment nature into credit processes for the corporate market. We will also develop the KPI when the market is more mature for it.

Targets for climate emissions, which are highlighted under climate, are also a central area and target for nature. In connection with the operationalization of the Transition Plan for Climate, a central instrument and goal will be requirements for customer interviews for lending customers in the corporate market. Similarly, we envision that the customer conversation will also include nature. Currently, there are no clear guidelines for targets for nature from the Norwegian authorities. We will continue to work on setting goals for nature for our lending portfolio in line with climate, when the topic of nature becomes more mature. We envision that an important area is the circular economy. Here, our bank has participated in a project together with several other large Norwegian banks, to map how the banking industry can work with a circular economy. In general, the bank will in the future also work to establish relevant

TCFD report point 5.3 Sustainability report point 11.1

https://www.sor.no/globalassets/organisasjon/barekraft/responsible-lending-policy-sparebanken-sor.pdfpoint 5.2 (Exclusion criteria)



products for the relevant four environmental goals that include	
nature in line with the EU taxonomy.	

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

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

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

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

Impact area	Indicator code	Response
Climate		
change		
change mitigation		

Impact area	Indicator code	Response
Financial		
health &		
inclusion		

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

We have set baseline, 2017, for our own climate emissions. We have set baseline, 2023, for climate emissions from lending to residential property and commercial property, which make aprox 85 % of total lending. We are in the process of preparing the Transition Plan. The first version in Norwegian is attached. For residential property and commercial property, we use emission trajectories based on CREEM, confer attachement "Transisjonsplan 2024". Methodology for climate emission for residential property and commercial property is based on "Guidelines for calculating financed emissions" from Finans Norge and PCAF.

We plan to establish a base line and emission trajectories for agriculture during 2024, based on the method of PCAF and

Sustainability report point 12.2

Confer attachment, "Transisjonsplan 2024"

⁸ Operational targets (relating to for example water consumption in office buildings, gender equality on the bank's management

board or business-trip related greenhouse gas emissions) are not in scope of the PRB.

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



Finance Norway. Although agriculture has large climate emissions, agriculture accounts for a small volume, approximately NOK 990 million.

Different industries will have different targets and emission trajectories.

Targets related to nature have not yet been set.

<u>SMART targets</u> (incl. key performance indicators (KPIs)¹⁰): Please disclose the targets for your first and your second area of most significant impact, if already in place (as well as further impact areas, if in place). Which KPIs are you using to monitor progress towards reaching the target? Please disclose.

Climate: Reduce in climate emission

Nature: Confer 2.2 a and b

TCFD report point 5.3 Transisjonsplan, chapter 3

<u>d)</u> <u>Action plan:</u> which actions including milestones have you defined to meet the set targets? Please describe.

Please also show that your bank has analysed and acknowledged significant (potential) indirect impacts of the set targets within the impact area or on other impact areas and that it has set out relevant actions to avoid, mitigate, or compensate potential negative impacts.

Sparebanken Sør has a lending and investment portfolio with low climate emissions and does not do business in industries with large climate emissions, cf. TCFD report. In our document Policy Responsible Lending, the bank has established various exclusion criteria for industries with high climate emissions. We will establish corresponding exclusion criteria for nature-related risk areas. Furthermore, we have set targets for sustainable products within lending.

Our action plan to achieve targets for climate reduction in lending - and the investment portfolio can be seen in the attached Transition Plan, "Transisjonsplan 2024". A first version of this is available and is attached. The transition plan is planned to be processed by the board in Q2/Q3 2024, and will then be operationalised. The transition plan will be continuously updated, and will be our strategic and operational tool to achieve the goals we have set for climate reduction. Similarly, we will work with the theme of nature, and climate and nature will probably merge in a joint Transition Plan.

We have established an ESG module in credit processes for the corporate market, where we risk-classify the customers' ESG risks related to climate and natural risks, among other things. Through customer conversations and good advice, we can also

TCFD report chapter 4 and 5 Policy responsible

Policy responsible lending point 5.2 (exclousion criteria)

https://www.sor.no/glo balassets/organisasjon /barekraft/2023klimaregnskapsparebanken-sor.pdf

Transisjonsplan 2024, chapter 4

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¹⁰ Key Performance Indicators are chosen indicators by the bank for the purpose of monitoring progress towards targets.



help to influence customers towards sustainable products and measures to reduce risk related to climate and nature. We have established products linked to energy efficienent mortgages and commercial real estate. Sustainable products and services, good advice and exclusion criteria will be the most central means of achieving targets for climate and nature. The impacts on climateemision are greatest in the lending business area. Sparebanken Sør's climate emissions is 254 tonnes of CO2, while climate emissions in the lending portfolio are calculated at approx. 240,000 tonnes of CO2 (Scope 1 and 2 downstream)

Self-assessment summary Which of the following components of target setting in line with the PRB requirements has your bank completed or is currently in a process of assessing for your				
	first area of most significant impact:	second area of most significant impact: Nature	(If you are setting targets in more impact areas)your third (and subsequent) area(s) of impact: (please name it)	
Alignment	⊠ Yes	□ Yes	□ Yes	
	☐ In progress		☐ In progress	
	□ No	□ No	□ No	
Baseline	⊠ Yes	☐ Yes	☐ Yes	
	☐ In progress	☐ In progress	☐ In progress	
	□ No	⊠ No	□ No	
SMART targets	⊠ Yes	☐ Yes	☐ Yes	
	☐ In progress	☐ In progress	☐ In progress	
	□ No	⊠ No	□ No	
Action plan	⊠ Yes	☐ Yes	☐ Yes	
		☐ In progress	☐ In progress	
	□ No	⊠ No	□ No	



2.3 Target implementation and monitoring (Key Step 2)

For each target separately:

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

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

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

We have a target for climate reduction in our own emissions of 55% in 2030 compared to base line in 2017. The climate account shows that already at the end of 2023 we have reduced our climate emissions by approx. 50%. In terms of lending we have established baseline in 2023. In terms of investments and financing, we have not yet established baselines, but the proportion of green bonds in the liquidity portfolio have increased each year. We have not established targets and baselines to see development in relation to Nature.

Sustainability report chapter 9, 10, and point 12.2



Principle 3: Clients and Customers



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

J. I Olicii	t chigagement		
=	ank have a policy or e sustainable practices?	ngagement process with clients and customers ¹¹ in place	tc
⊠ Yes	☐ In progress	□ No	

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

oximes Yes oximes In progress oximes No

3.1 Client engagement

Describe how your bank has worked with and/or is planning to work with its clients and customers to encourage sustainable practices and enable sustainable economic activities¹²). It should include information on relevant policies, actions planned/implemented to support clients' transition, selected indicators on client engagement and, where possible, the impacts achieved.

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

All loan cases for the corporate market > 8 million have a mandatory ESG model, with a focus on climate and nature. In this connection, the customer manager at the bank will communicate, survey and provide advice on sustainability topics and sustainability products to the customer. This dialogue is very important, in order to build expertise both ways.

TCFD report point 4.1.1

Transisjonsplan 2024, chapter 4

3.2 Business opportunities

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

Strategic business opportunities:

1. Sale of sustainable products

We currently have three products; green mortgage loans, green loans for commercial property and green rehabilitation loans for commercial property.

In the near future, we will establish several green products including:

Sustainable products and services:

Sustainability report point 7.3, 9.4, and 9.5



Green housing energy/rehabilitation loans.

Loans for housing and commercial property make aprox 85% of the bank's total lending, and we will therefore prioritize sustainable products for these segments.

As the EU taxonomy comes into place, we will establish more sustainable products, for example we will focus on products linked to the circular economy.

Use of sustainable loans for financing as well as possibly lower risk weights on sustainable loans (EBA), and reduced risk, we reinforce the motivation for growth in sustainable loans.

2. Sustainable bonds in the liquidity portfolio

The liquidity portfolio is strictly regulated by Norwegian law. We have increased the share of sustainable bonds in 2023.

3. Financing under the Green & Sustainability Bond Framework Sustainable loans are an important premise for financing during the framework shift. Through sustainable loans, we get better access to, and somewhat lower prices for financing. The share of sustainable financing has increased, and we have ambitions to increase this share further.

4. Digitalization of products and services Reduced travel by use of video meetings.

Sustainable bonds in liquidityportefolio: Sustainability report point 10.2

Financing under Green & Sustainability Bond Framwork: Sustainability report point 10.4

Principle 4: Stakeholders



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

¹¹ A client engagement process is a process of supporting clients towards transitioning their business models in line with sustainability goals by strategically accompanying them through a variety of customer relationship channels.

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



4.1 Stakeholder identification and consultation

Does your bank have a process to identify and regularly consult, engage, collaborate and partner with stakeholders (or stakeholder groups¹³) you have identified as relevant in relation to the impact analysis and target setting process?

Har banken din en prosess for å identifisere og regelmessig konsultere, engasjere, samarbeide og samarbeide med interessenter (eller interessentgrupper) du har identifisert som relevant i forhold til konsekvensanalysen og målsettingsprosessen?

	☐ In progress	□ No
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Please describe which stakeholders (or groups/types of stakeholders) you have identified, consulted, engaged, collaborated or partnered with for the purpose of implementing the Principles and improving your bank's impacts. This should include a high-level overview of how your bank has identified relevant stakeholders, what issues were addressed/results achieved and how they fed into the action planning process.

Primarily, it is internal interest groups that participate in the processes. The most important are the board, group management and the divisions that have operational responsibility for the implementation and follow-up of relevant ESG topics.

Sustainability report chapter 3

Furthermore, we have and will use external consultants in various processes. We also consult our auditor on these topics, primarily in connection with the audit process. Customers and investors are also useful conversational partners. Furthermore, under the auspices of Finans Norge, we have various collaborations with other banks. This may include projects such as PCAF, but the bank also have seat on the Finans Norge's Sustainability Committee, together with other major Norwegian banks, insurance and life companies. We find that it is most useful to discuss sustainability with other banks, as there are common challenges and important topics. Furthermore, Norwegian regulators such as Finanstilsynet (Norwegian FSA) will be central conversation partners and policy makers for the work with climate and nature. International companies and joint initiatives and frameworks such as PCAF, SBTI, Sustainalytics. Moody's.. UNEP PRB, EU taxonomy, CSRD etc. are important for standardization and further development of the sustainability area. It is from these stakeholders that we get the most impulses and influence.

In connection with impact analysis 2024, according to CSRD, we will continue to work with both mapping, involvement and projects with stakeholders. We are also involved in several national and regional collaboration projects and stakeholder groups within sustainability. As a key measure in the Transition Plan, dialogue, cooperation and requirements for our customers regarding reducing their climate emissions appear. This is a very important area, if we are to achieve our and the Paris Agreement's targets for climate emissions, as well as safeguarding nature.

¹³ Such as regulators, investors, governments, suppliers, customers and clients, academia, civil society institutions, communities, representatives of indigenous population and non-profit organizations



Principle 5: Governance & Culture



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

5.1 Governance Structure for Implementation of	f the Principles	
Does your bank have a governance system in place that incorporates the PRB?		
Please describe the relevant governance structures, policies and proceplace/is planning to put in place to manage significant positive and negand support the effective implementation of the Principles. This includes	ative (potential) impacts	
 which committee has responsibility over the sustainability strategy approval and monitoring (including information about the highest le PRB is subjected to), 		
 details about the chair of the committee and the process and frequen oversight of PRB implementation (including remedial action in the even milestones not being achieved or unexpected negative impacts being 	ent of targets or	
remuneration practices linked to sustainability targets.		
The management structure for sustainability appears in the	Governance:	
management document Strategy Sustainability.	https://www.sor.no/gl obalassets/organisasj on/barekraft/sustaina bility-strategy- sparebanken-sor.pdf page 6	
Management documents appear in our sustainability library. https://www.sor.no/fe les/om-sparebanken sor/about/social- responsibility/sustair ability-reports/		
5.2 Promoting a culture of responsible banking	•	
Describe the initiatives and measures of your bank to foster a culture of among its employees (e.g., capacity building, e-learning, sustainability facing roles, inclusion in remuneration structures and performance mail leadership communication, amongst others).	f responsible banking trainings for client-	
	Sustainability report	
The most important initiatives to build a culture of sustainability in Sparebanken Sør are:	point 4.4.3	
- Leaders lead the way and show the way		
- Training and competence building in connection with our transition plans, and understanding the need for measures and		



change, will be a central element in culture building both in our own organization as well as towards our customers.

- Competence building - external courses/seminars, (Teams etc), e-learning, internal lectures on various sustainability themes.

Average training per employee in 2023 was 222 hours, of which general training in sustainability, money laundering, privacy and information security, ethics etc. are included as annual compulsory topics

- Competence building in operational use, for example the ESG module in credit processes where all customer managers in the corporate market receive training and are in dialogue with customers. Sustainability is not integrated into the bank's salary

5.3 Policies and due diligence processes

systems.

Does your bank have policies in place that address environmental and social risks within your portfolio?¹⁴ Please describe.

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

Regarding management structure confer point 5.12

Regarding management documents and policy conferences our policydocuments.

The Openness Act is a due diligence process regarding ESG on suppliers.

The ESG module in credit processes for loans to business is a form of due diligence process. Furthermore, we have on-boarding processes for new customers in relation to identity checks, financial crime etc. The bank has complaints and notification mechanisms and internal control processes. Key elements in the sustainability report are audited by an external auditor.

In connection with CSRD, we will update, improve and prepare several new policies in 2024. We will also integrate the sustainability report in the annual report for the financial year 2024. The integrated report (including sustainability) will be subject to audit.

https://www.sor.no/fel les/om-sparebankensor/about/socialresponsibility/sustain ability-reports/

https://www.sor.no/fel les/om-sparebankensor/samfunnsansvar/ apenhetsloven/

Self-assessment summary

Does the CEO or other	C-suite officers have regular oversight over the implementation of the
Principles through the	bank's governance system?
⊠ Yes	□ No

Does the governance system entail structures to oversee PRB implementation (e.g. incl. impact analysis and target setting, actions to achieve these targets and processes of remedial

¹⁴ Applicable examples of types of policies are: exclusion policies for certain sectors/activities; zero-deforestation policies; zero-tolerance policies; gender-related policies; social due diligence policies; stakeholder engagement policies; whistle-blower policies etc., or any applicable national guidelines related to social risks.



action in the education detected)?	event targets/milestone	s are not achieved or unexpected neg. impacts are
⊠ Yes		□ No
	nk have measures in p s described in 5.2)?	lace to promote a culture of sustainability among
⊠ Yes	☐ In progress	□ No



Principle 6: Transparency & Accountability



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

	Assurance is publicly disclosed information on your Pendent assurer?	RB commitments been assured by an
□ Yes	s □ Partially ⊠ No	
If appli	cable, please include the link or description	n of the assurance statement.
•	because of the audit report for the nability report.	https://www.sor.no/globalassets/organisasj on/barekraft/2023-sustainability-report- sparebanken-sor.pdf
6.2	Reporting on other framework	rks
Does y framev		on in any of the listed below standards and
\boxtimes	GRI	
	SASB	
	CDP	
	IFRS Sustainability Disclosure Standards	s (to be published)
\boxtimes	TCFD	
\boxtimes	Other: PCAF	
Respo	onse	https://www.sor.no/globalassets/organisasj on/barekraft/2023-sustainability-report- sparebanken-sor.pdf https://www.sor.no/globalassets/organisasj on/barekraft/2022-tcfd-report- sparebanken-sor.pdf
6.3	Outlook	



What are the next steps your bank will undertake in next 12 month-reporting period (particularly on impact analysis¹⁵, target setting¹⁶ and governance structure for implementing the PRB)? Please describe briefly.

The most important measures over the next 12 months are:

- Implement CSRD and additional EU taxonomy environmental targets
- Intergrate Financial- and Sustainability report
- Update TCFD and TNFD report based on CSRD and the transition plan
- Operationalize the transition plan
- Establish relevant sustainable products according to the EU taxonomy
- Establish baseline and pathway for climate emissions for lending to agriculture
- Establish baseline and pathway for climate emissions for investments
- Continue work on competence building
- Continue work with other ESG areas (In the Sustainability Report, various planned activities appear under the various themes in the table in the first point.)
- Increase staffing with competence in Sustainability
- Continue the work with nature and circular economy
- Continue improvements of KPI, data, systems and reporting systems

Confer Sustainability report different themes, (Information table)

¹⁵ For example outlining plans for increasing the scope by including areas that have not yet been covered, or planned steps in terms of portfolio composition, context and performance measurement

16 For example outlining plans for baseline measurement, developing targets for (more) impact areas, setting interim targets,

developing action plans etc.



☐ Embedding PRB ov	versight into governance	☐ Customer engagement
☐ Gaining or maintain bank	ing momentum in the	☐ Stakeholder engagement
		□ Data availability
focus on in the beginn	ere to start and what to ing	□ Data quality
☐ Conducting an impa	act analysis	☐ Access to resources
☐ Assessing negative social impacts	environmental and	□ Reporting
□ Choosing the right □ Choosing t	nerformance	☐ Assurance
measurement method		□ Prioritizing actions internally
⊠ Setting targets		
□ Other:		
If desired, you can ela	borate on challenges and	how you are tackling these:

Annex

A set of indicators has been produced for the impact areas of climate mitigation and financial health & inclusion. These indicators will support you in your reporting and in showing progress against PRB implementation. Banks are expected to set targets that address minimum two areas of most significant impact within the first four years after signing the PRB. That means that Banks should ultimately set targets using impact indicators. Acknowledging the fact that banks are in different stages of implementation and on different levels of maturity and therefore might not be able to report on impact from the beginning, a Theory of Change approach has been used to develop the set of indicators below. ¹⁷ The Theory of Change shows the **pathway to impact** and considers the relationship between inputs, actions, outputs, and outcomes in order to achieve impact. The Theory of Change for climate mitigation can be found here, the Theory of Change for financial health & inclusion can be found here.

How to use: Both practice (action, outcome and output) and impact performance need to be understood because practice is the conduit for achieving desired impacts (including targets). The Theory of Change allows to identify metrics and set targets which align with a bank's maturity. The indicators below are all connected to a bank's impact and can be considered as steps towards measuring impact. Some of the practice indicators (on the action, output, and outcome levels respectively) are connected to portfolio composition and financial targets¹⁸ (highlighted in **green**) or to client engagement¹⁹ targets (highlighted in **blue**), which enable your overall target. If your bank has prioritized climate mitigation and/or financial health & inclusion as (one of) your most significant impact areas, it is strongly recommended to report on the indicators in the Annex to measure your performance and baseline.²⁰ Once you have set the target, you can use the indicators as guidance for your action plan as well as defining Key Performance Indicators (KPIs) which you can then use to measure progress against the set targets.

¹⁷ It is not required from banks to work with the Theory of Change concept internally. In fact, the Theory of Change has been used to structure the requirements of setting SMART targets using relevant indicators.

¹⁸ Financial targets also aim for real economy outcomes but are not directly expressed as such. Instead, they are expressed with financial indicators and metrics, e.g., to redirect flows of lending and investments to sectors, activities or projects aligned with SDGs and/or related to the selected impact area. Banks can also set financial targets related to specific types of customers e.g., low-income customers or female entrepreneurs.

¹⁹ Client engagement targets involve engaging relevant clients and customers to enable your overall target. The purpose of client engagement is to support clients towards transitioning their business models in line with sustainability goals by strategically accompanying them through a variety of customer relationship channels.

²⁰ You might not be able to report on all indicators and/or or levels of practice (i.e. from left to right), in which case you should report on all applicable indicators on the respective level of practice no matter if it is an action, output or outcome indicator.



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



	Practio	e ²¹ (pathway to impac	ct)							Impact ²²			
Impact area	1. Actio	on indicators		2. Output indicators			3. Outc	ome indicators		4. Impact indicators			
	Code	Indicator	Response options & metrics	Code	Indicator	Response options & metrics	Code	Indicator	Response options & metrics	Code	Indicator	Response options & metrics	
Climate change mitigation	A.1.1	Climate strategy: Does your bank have a climate strategy in place?	Yes / In progress / No	A.2.1	Client engagement process: Is your bank in an engagement process with clients regarding their strategy towards a low(er)-carbon business model (for business clients), or towards low(er)- carbon practices (for retail clients)?	Yes / Setting it up / No; If yes: Please specify for which clients (types of clients, sectors, geography, number of clients etc.)	A.3.1	Financial volume of green assets/low- carbon technologies: How much does your bank lend to/invest in green assets / loans and low- carbon activities and technologies?	bln/mn USD or local currency, and/or % of portfolio; please specify the definition of green assets and low-carbon technologies used	A.4.1	Reduction of GHG emissions: how much have the GHG emissions financed been reduced?	% over time; baseline and tracking GHG emissions in kg of CO ₂ e (or applicable metrics) ²³	
A. Climate	A.1.2	Paris alignment target: Has your bank set a long- term portfolio-wide Paris-alignment target? To become net zero by when?	Yes / In progress / No; If yes: - please specify: to become net zero by when? - Emissions baseline / base year: What is the emissions baseline / base	A.2.2	Absolute financed emissions: What are your absolute emissions (financed emissions = scope 3, category 15) in your lending and/or	Total GHG emissions or CO₂e (please also disclose what is excluded for now and why)	A.3.2	Financial volume lent to / invested in carbon intensive sectors and activities and transition finance: How much does your bank lend to / invest in carbon- intensive	bln/mn USD or local currency, and/or % of portfolio	A.4.2	Portfolio alignment: How much of your bank's portfolio is aligned with Paris (depending on the target set [A.1.2] either 1.5 or 2 degrees)?	% of portfolio (please specify which portfolio; for corporate and business clients: % of sectors financed)	

²¹ Practice: the bank's portfolio composition in terms of key sectors, its client engagement, and its relevant policies and processes, and, if applicable, its advocacy practices

²² Impact: the actual impact of the bank's portfolio

²³ If possible and/or necessary, please contextualize the progress: Greenhouse gas emissions might even increase initially because the scope of measurements is extended and financed emissions from a growing proportion of the portfolio are measured, emission factors are updated etc. Emission reductions made by the clients should over time lead to a decrease in GHG emissions financed.



		year for your target? - Climate scenario used: What climate scenario(s) aligned with the Paris climate goals has your bank used?		investment portfolio?		sectors and activities ²⁴ ? How much does your bank invest in transition finance ²⁵ ?		
A.1.3	Policy and process for client relationships: has your bank put in place rules and processes for client relationships (both new clients and existing clients), to work together towards the goal of transitioning the clients' activities and business model?	Yes / In progress / No	A.2.3	Sector-specific emission intensity (per clients' physical outputs or per financial performance): What is the emission intensity within the relevant sector?	Please specify which sector (depending on the sector and/or chosen metric): kg of CO ₂ e/kWh, CO ₂ e / m2; kg of CO ₂ e/USD invested, or kg of CO ₂ e/revenue or profit			
	Portfolio analysis: Has your bank analyzed (parts of) its lending and/or investment portfolio in terms of financed emissions (Scope 3, category 15); technology mix or carbon-intensive sectors in the portfolio?	Yes / In progress / No; If yes: please specify which parts of the lending and investment portfolio you have analyzed	A.2.4	Proportion of financed emissions covered by a decarbonization target: What proportion of your bank's financed emissions is covered by a decarbonization target, i.e. stem from clients with	% (denominator: financed emissions in scope of the target set)			

²⁴ A list of carbon-intensive sectors can be found in the <u>Guidelines for Climate Target Setting</u>.
²⁵ Transition finance is defined as financing the transition towards a low-carbon future in alignment with the Paris climate goals. It entails any form of financial support for non-pure play green activities to become greener and reduce emissions.



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



B.1.2	% of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health	Based on internal data. Measures the percentage of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health. Including	B.2.2	% of customers actively using the online/mobile banking platform/tools	means that the bank has measured if the initiative is successful in generating the desired results of stronger financial skills, and thus, any individual that is supported with the initiative will achieve the desired results. A bank can't count a click as an individual so we encourage that the data is presented as # of individuals for deanonymized users and # of interactions for anonymized users. Transactional data based. Measures the percentage of customers logging in, at least once a month, to one of the following digital platforms	B.3.2	% of customers who use the bank's services to create a financial action plan with the bank	Transactional and/or survey data based. Measures the percentage of customers who create a financial action plan with the bank using the bank's	B.4.2	% of customers for which spending exceeded 90% of inflows for more than 6 months last year	Survey and/or transactional data based. Measures the percentage of customers with a transaction account and/or savings/investme nt accounts for which spending
	financial inclusion, responsible credit and/or financial	supported with effective training on financial inclusion, responsible credit			customers logging in, at least once a month, to one of		financial action plan with the	percentage of customers who create a financial action plan with the bank using		of inflows for more than 6 months last	customers with a transaction account and/or savings/investme



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



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



												using the question: "If a major unexpected expense arises, how can you cover it right now?" and give the multiple choice options of insurance, emergency funds, loan, credit card, family/friends, etc.
C. Financial Inclusion	C.1.1	# of products and services in the portfolio with a focus on financial inclusion	Internal data based. Measures how many of the products and services in the portfolio have a financial inclusion focus. We deem a product or service to have this focus when its design facilitates the access and usage by the prioritized customer. For example, no-fee savings account, low interest microloan, offline access or simbased banking apps, etc	C.2.1	# of individuals supported with dedicated and effective financial and/or digital education initiatives	Based on internal data. Measures the number of users (customers and non customers) of financial and/or digital skills-building initiatives offered by the bank. An initiative encompasses courses, programs, training videos, articles, SMS education campaigns, etc. Dedicated means that the initiative was specially created for a defined group of individuals (in many cases a prioritized group). Effective means that the bank has measured if the initiative is	C.3.1	% of individuals with a good and/or very good level of financial skills	Assessment based. Measures the percentage of individuals with a good and/or very good level of financial skills according to the assessment chosen by the financial institution. Should be measured on individuals benefitting from the bank's financial education initiatives.	C.4.1	% of customers with 2 or more active financial products, from different categories, with the bank	Transactional data based. Measures the percentage of customers with 2 or more active financial products, from different categories, with the bank. By active we mean there's at least one usage per month. By category we mean credit/debt, savings/deposit/p ayment, insurance, investment, etc. Once a target has been set for this indicator, we encourage banks to ensure responsible selling policies or other initiatives so that the target doesn't become a toxic incentive.



Principles for Responsible Banking

					successful in					
					generating the desired results of					
					stronger financial					
					skills, and thus,					
					any individual					
					that is supported					
					with the initiative					
					will achieve the					
					desired results.					
					A bank can't					
					count a click as					
					an individual so					
					we encourage					
					that the data is					
					presented as #					
					of individuals for					
					deanonymized					
					users and # of					
					interactions for					
					anonymized					
					users.					
C.1.2	% of relevant	Based on internal	C.2.2	% of customers	Transactional	C.3.2	% of customers	"Transactional		
Ī	employees	data. Measures the		with effective	data based.		supported with	data based.		
	supported with	percentage of		access to a	Measures the		dedicated	Where		
	effective training on financial inclusion.	relevant employees		basic banking	percentage of customers with		customer	dedicated customer		
	responsible credit	supported with		product	effective access		journey/advisory services			
	and/or financial	effective training on financial inclusion,			to a basic		services	journey/advisory services are in		
	health	responsible credit			banking product.			place for		
	Health	and/or financial			By effective we			prioritized		
		health. Including			mean the usage			groups, this		
		training to attend			beyond first			indicator		
		the needs of			access. Basic			measures		
		prioritized groups.			banking products			the percentage		
		Effective means			vary by bank.			of customers		
		that the bank has			Good examples			using such		
		measured if the			are: checking			services.		
		initiative is			accounts,			Depending on		
		successful in			payment			size of bank,		
		generating the			accounts, credit			either number or		
		desired results of			cards, saving			percentage can		
		stronger skills, and			accounts,			be the unit of		
		thus, any individual			deposit			measure.		
		that is supported			accounts, e-			ĺ		
		with the initiative			40004					



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