

## Principles for Responsible Banking

### Reporting and Self-Assessment Template

The following table sets out the reporting and self-assessment requirements for Signatories of the Principles for Responsible Banking. Signatory banks need to report on their implementation of the Principles the first time within latest 18 months after signing and annually thereafter (in line with their annual reporting cycle).

#### How to use this template:

This template does NOT require your bank to produce an additional report. Rather, this template is designed for your bank to provide references/links to where in your existing reporting/public domains the required information can be found. The aim is to keep additional reporting burden to a minimum while ensuring transparency and accountability as set out in Principle 6.

Within this reporting template, there are six areas for self-assessment that are key to showing that your bank is fulfilling its commitments as a signatory of the Principles for Responsible Banking. They are highlighted.

1. Impact Analysis
2. Target Setting
3. Plans for Target Implementation and Monitoring
4. Progress on Implementing Targets
5. Governance Structure for Implementation of the Principles
6. Progress on Implementing the Principles for Responsible Banking

Only for these six highlighted items, it is required that:

- a) An assurer provides limited assurance of your self-assessment. 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.
- b) You provide your bank's conclusion/statement if it has fulfilled the respective requirements.

#### Accommodating different starting points:

Banks have different starting points and operate in different contexts. Your bank may not be able to provide all information required in this template the first time you report. That is fine. Your bank has up to four years from signing to bring its reporting fully in line with the requirements. Feedback, support, and peer learning are available to all signatory banks to help them progress with both implementation and reporting.

Reporting and Self-Assessment Requirements	High-level summary of bank's response (limited assurance required for responses to highlighted items)	Reference(s)/ Link(s) to bank's full response/ relevant information
 <p><b>Principle 1: Alignment</b>  <b>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.</b></p>		
<p>1.1 <i>Describe</i> (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, and where relevant the technologies financed across the main geographies in which your bank has operations or provides products and services.</p>	<p>Roslagens Sparbank was founded in 1859 and is today Sweden's 11th largest savings bank. Roslagens Sparbank has its area of operation in Norrtälje municipality in Stockholm County called Roslagen. The bank's head office is located in Norrtälje. In addition, the Bank has offices in Hallstavik, Rimbo and Älmsta. The bank conducts lending and borrowing activities for more than 45,000 private and corporate customers. Furthermore, the Bank provides the following services: securities trading, legal and financial advice, payment intermediation, insurance mediation, provisioning of guarantees and guarantees, as well as the rental of service compartments.</p> <p>The bank's total business volume, which refers to customers' borrowing and lending in the bank as well as brokered products such as funds, insurance, leasing and mortgages, amounted to TSEK 35,676,848 at year-end. Deposits from the general public amounted to TSEK 10,680,139 at year-end. Lending to the public at year-end amounted to TSEK 8,111,771,000. Brokered credits</p>	<p>In our report, we refer largely to our Annual and Sustainability report. It is in Swedish, but if there are some parts you want translated, please contact us.</p> <p>See the section "Förvaltningsberättelse" on p. 43 of our Annual report 2021.</p> <p><a href="#">Finansiell information för Roslagens Sparbank</a></p>

	<p>to Swedbank Hypotek amounted to SEK 7,191,212 thousand. The bank has a close cooperation with Swedbank AB regarding IT, products and the logo, but is an independent savings bank.</p>	
<p>1.2 <i>Describe</i> how your bank has aligned and/or is planning to align its strategy to be consistent with and contribute to society's goals, as expressed in the Sustainable Development Goals (SDGs), the Paris Climate Agreement, and relevant national and regional frameworks.</p>	<p>Thrift has been part of our mission since 1859. Likewise, to take a clear social responsibility where we, directly and through our foundations, contribute to sustainable economic growth and ecological and social development in Norrtälje municipality. Since 1859, Roslagens Sparbank has played an important role in Norrtälje municipality and worked to ensure that our customers have a healthy and sustainable economy. Since then, the world continues to change, but the savings bank idea lives on because a savings bank has no shareholders and part of the annual profit can go back to the local community in support of activities, projects and organizations. Usually through one of our foundations for Business and Culture; Research and education; Youth housing; and the development of The Häverö district. Our vision is an attractive and open Roslagen in growth.</p> <p>As a bank, we are part of society's cycle and a number of new regulations put the role of banks in focus for the possibility of a more sustainable future. We can influence the transition through, among other things, our financing, the products we offer and the conditions we set. In 2021, we added more green products to our customer offering and have further strengthened our offering in sustainable fund offerings. As a bank,</p>	<p>See “Our Business Strategy” and “Banken som accelerator för en hållbar omställning” on p. 14-19 of our 2021 Sustainability Report</p> <p><a href="#">Finansiell information för Roslagens Sparbank</a></p>

	<p>we obviously also need to manage some risks and they include how climate risks affect our business and our customers, but also how the bank risks being exploited for criminal activities, for example via money laundering. These are issues that we take very seriously and have procedures and systems in place to deal with these.</p> <p>For Roslagens Sparbank's sustainability work, the starting point is partly the Paris Agreement and partly the UN's Agenda 2030, where the countries of the world have committed to work with the 17 global goals by 2030. Since 2008, the bank has been part of the UN Global Compact and its ten principles linked to human rights, anti-corruption, work environment and the environment.</p> <p>The bank's sustainability work is based on our governance, goals, external events and customer needs. We take in important input from our stakeholders and have identified the essential areas to work with within ESG (environmental, social and governance). Of the essential areas identified, the priority is to initially work primarily with Climate and Environmental Impact in products and services, sustainable finance, being an economically stable bank, our community involvement and local impact, accessibility and transparency. To our essential areas, we have linked Sustainable development goals.</p>	
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**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:**

Show that your bank has identified the areas in which it has its most significant (potential) positive and negative impact through an impact analysis that fulfills the following elements:

- a) Scope: The bank’s core business areas, products/services across the main geographies that the bank operates in have been as described under 1.1. have been considered in the scope of the analysis.
- b) Scale of Exposure: In identifying its areas of most significant impact the bank has considered where its core business/its major activities lie in terms of industries, technologies, and geographies.
- c) Context & Relevance: Your bank has considered the most relevant challenges and priorities related to sustainable development in the countries/regions in which it operates.

The bank has carried out an impact analysis using the UNEP FI PORTFOLIO IMPACT ANALYSIS TOOL FOR BANKS. In the impact analysis, we have analysed products and services in the corporate and private markets. Roslagens Sparbank has more than 45,000 private and corporate customers, the majority of whom are private customers. The bank exists and operates only in Sweden and is not one of the 10 largest banks. On the private side, we have identified the following areas where the bank has a positive and negative impact.

Positive impact	Negative impact
Employment	Inclusive, healthy economies
Inclusive, healthy economies	Resources efficiency/security
Justice	Climate
Economic convergence	
Housing	
Mobility	

On the corporate side, we have identified the following areas where the bank has a positive and negative impact.

Positive impact	Negative impact
Housing	Biodiversity & ecosystems
Health & Sanitation	Climate
Education	Waste
Culture & heritage	Resources efficiency/security
Employment	Culture & heritage
Food	Air
Climate	Soil
Soil	Availability – Water
	Quality – Water
	Health & sanitation

<p>d) <u>Scale and intensity/salience of impact:</u> In identifying its areas of most significant impact, the bank has considered the scale and intensity/salience of the (potential) social, economic and environmental impacts resulting from the bank’s activities and provision of products and services. (your bank should have engaged with relevant stakeholders to help inform your analysis under elements c) and d))</p> <p><i>Show that building on this analysis, the bank has</i></p> <ul style="list-style-type: none"> <li>• Identified and disclosed its areas of most significant (potential) positive and negative impact</li> <li>• Identified strategic business opportunities in relation to the increase of positive impacts / reduction of negative impacts</li> </ul>	<p>As a way to take into account the most relevant challenges and priorities related to sustainable development in our region, we conducted an external and stakeholder analysis together with KPMG in autumn 2021. It was based on in-depth interviews with a selection of external and internal stakeholders such as private and corporate customers, partners, municipal representatives, our foundations, principals, the board, bank management and employees. We supplemented the in-depth interviews with a survey to which the majority of the bank's employees responded. In line with the principles of responsible banking, we strive for a high level of involvement of our stakeholders to prioritize and formulate our goals. We work from all three perspectives within ESG (Environmental, Social &amp; Governance), to achieve a sustainable development of the business and to contribute to the global goals (Agenda 2030).</p> <p>Our external and stakeholder analysis gave us good information about which key areas of ESG the bank should focus on going forward. Based on this, we made an impact analysis to make visible how Roslagens Sparbank can have the greatest impact. We then produced a Gap Analysis for the entire business that describes our current situation in all areas and our ambition. Over half of the bank’s employees have been involved in the work and we have a clear roadmap and long-term perspective in the plan for how to close the gaps.</p> <p>To identifying our areas of most significant impact, we have considered the scale and intensity/salience of the (potential) social, economic, and environmental impacts resulting from the bank’s activities and provision of products and services through an impact analysis. The analysis is based on the key areas that our stakeholders believe are most important that we focus on as well as the areas where we as a bank have the greatest impact on ESG.</p>	<p>See “Impact Analysis” on p. 16-19 of our 2021 Sustainability Report</p>
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Of the essential issues among stakeholders where we as a bank have the greatest impact, this is a selection and the ones prioritised:

- Climate and environmental impact in products and services
- Sustainable finance
- Financially stable bank
- Community engagement and local impact
- Availability
- Transparency

Please provide your bank's conclusion/statement if it has fulfilled the requirements regarding Impact Analysis.

We have undertaken our impact analysis and identified the significant impacts that are associated with our private and business banking portfolios.

## 2.2 Target Setting

*Show* that the bank has set and published a minimum of two **Specific, Measurable** (can be qualitative or quantitative), **Achievable, Relevant and Time-bound** (SMART) targets, which address at least two of the identified “areas of most significant impact”, resulting from the bank’s activities and provision of products and services.

*Show* that these 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. The bank should have identified a baseline (assessed against a particular year) and have set targets against this baseline.

*Show* that the bank has analysed and acknowledged significant (potential) negative impacts of the set targets on other dimensions of the SDG/climate change/society’s goals and that it has set out relevant actions to mitigate those as far as feasible to maximize the net positive impact of the set targets.

The Bank's stakeholder, materiality and gap analysis was completed in Q1 2022. The Board has subsequently decided to direct efforts towards the SDGs with sub-targets as set out below. The targets are clearly linked to the significant areas identified by the Bank as well as areas where the Bank has a negative impact that was identified in UNEP's Impact Analysis compiled by the Bank.

**7: Ensure access to affordable, reliable, sustainable and modern energy for all**, with sub-goals

- o 7.3
- o 7.A

**8: Promote sustained, inclusive, and sustainable economic growth, full and productive employment and decent work for all**, with sub-goals

- o 8.1
- o 8.5
- o 8.6
- o 8.8
- o 8.10

**11: Make cities and human settlements inclusive, safe, resilient, and sustainable**, with sub-goals

- o 11.4
- o 11.5

Riktlinje för Roslagens Sparbanks hållbarhetsarbete

[Riktlinje för bankens hållbarhetsarbete](#)

	<p><b>12: Ensure sustainable consumption and production patterns, with sub-goals</b></p> <ul style="list-style-type: none"> <li>○ 12.2</li> <li>○ 12.5</li> <li>○ 12.6</li> <li>○ 12.8</li> </ul> <p><b>13: Take urgent action to combat climate change and its impacts, with sub-goals</b></p> <ul style="list-style-type: none"> <li>○ 13.1</li> <li>○ 13.3</li> </ul> <p>Through our four foundations, in addition to the goals above, we will focus on:</p> <p><b>4: Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all, with sub-goals</b></p> <ul style="list-style-type: none"> <li>○ 4.4</li> </ul> <p><b>10. Reduce inequality within and among countries, with sub-goals</b></p> <ul style="list-style-type: none"> <li>○ 10.2</li> <li>○ 10.3</li> <li>○ 10.7</li> </ul> <p><b>14. Conserve and sustainably use the oceans, seas, and marine resources for sustainable development, with sub-goals</b></p> <ul style="list-style-type: none"> <li>○ 14.1</li> <li>○ 14.2</li> <li>○ 14.5</li> <li>○ 14A.</li> </ul>	
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With the materiality analysis, impact analysis and SDGs above as a starting point, the bank is in the initial phase of formulating several goals to work with until 2025. At present, the bank measures all three scopes according to the GHG protocol but only focused on the bank's activities (see page 28, Sustainability report 2021). From 2023, our ambition is to primarily measure our impact from our financing. We have chosen to publish two goals, which are still under development:

**Overall targets 2025**

Increase the percentage of total fund wealth of our clients which is related to sustainability related funds.

Our green financing in the corporate business.

Please provide your bank's conclusion/statement if it has fulfilled the requirements regarding Target Setting.

We will continue to work on our goals and KPIs in 2022 to work towards the global goals and the essential areas we have identified. We will publish our target and goal fulfilment in the Sustainability report for 2022.

### 2.3 Plans for Target Implementation and Monitoring

*Show* that your bank has defined actions and milestones to meet the set targets.

*Show* that your bank has put in place the means to measure and monitor progress against the set targets. Definitions of key performance indicators, any changes in these definitions, and any rebasing of baselines should be transparent.

Setting a plan for integrating sustainability into the business is part of the bank's management by objectives for 2022, which is established and followed up by the bank management and reported to the board. The bank's stakeholder, materiality and gap analysis were completed during Q1 2022 and work has now begun to hand over each areas of responsibility to each manager in order to integrate sustainability work into the business. Objectives, goal achievement, activities and KPIs will be communicated in the Sustainability report for 2022 and in the reporting for responsible banking in 2023.

Please provide your bank's conclusion/statement if it has fulfilled the requirements regarding Plans for Target Implementation and Monitoring.

Goals and target fulfilment, activities and KPIs will be communicated in the Sustainability report for 2022. There we will also link the goals to our selected SDGs.

### 2.4 Progress on Implementing Targets

For each target separately:

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

**Or explain** why actions could not be implemented / needed to be changed and how your bank is adapting its plan to meet its set target.

*Report* on your bank's progress over the last 12 months (up to 18 months in your first reporting after becoming a signatory) towards achieving each of the set targets and the impact your progress resulted in. (Where feasible and appropriate, banks should include quantitative disclosures)

We have identified our positive and negative impact, essential areas to work towards, prioritised these and linked them to SDGs. Objectives, goal achievement, activities and KPIs will be communicated in the Sustainability report for 2022 and in the reporting for responsible banking in 2023.

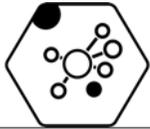
<p>Please provide your bank's conclusion/statement if it has fulfilled the requirements regarding Progress on Implementing Targets</p>		
<p>Work has begun to integrate the sustainability area throughout the bank. Goals, goal achievement, activities and KPIs will be communicated in the Sustainability report for 2022. There we will also link the goals to our selected SDGs.</p>		
	<p><b>Principle 3: Clients and Customers</b>  <b>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.</b></p>	
<p>3.1 <i>Provide an overview</i> of the policies and practices your bank has in place and/or is planning to put in place to promote responsible relationships with its customers. This should include high-level information on any programmes and actions implemented (and/or planned), their scale and, where possible, the results thereof.</p>	<p>Roslagens Sparbank's policies and guidelines are established by the Board of Directors and instructions are established by the CEO and revised annually.</p> <p><b>Sustainable finance disclosure regulation</b>          The regulation entered into force in the EU on 10 March 2021. The regulation means that Roslagens Sparbank in the role of financial advisor will have a responsibility to inform the customer about the integration of sustainability risks into the processes for the financial products that are distributed. With this as a starting point, the bank has made the decision to consider the main negative consequences regarding sustainability in its advice. This means the consequences of the client's investment decisions that have a significant negative impact on sustainability factors relating to environmental, social and employee issues, respect for human rights and the fight against corruption and bribery.</p>	<p><a href="#">Sustainable Finance Disclosure regulation</a></p>

	<p><b>Guideline sustainability risks</b></p> <p>The Bank takes a clear responsibility in considering and managing environmental, social or governance events or circumstances that may have a material adverse impact on the value of the client's investments.</p> <p>Sustainability risk integration into investment advice takes place through a selection process. The process means that the fund and the fund company are examined based on various criteria, including the sustainability risk perspective. The assessment from the sustainability risk perspective may consist of different factors such as how fund management companies integrate sustainability risk into their investment decisions or how the investment strategy to the fund affects the sustainability risk to which the fund is exposed. The Fund shall also be regularly monitored to ensure that it complies with the requirements.</p> <p>The bank has cooperation with Swedbank Försäkring AB regarding the distribution of insurance products. For investments within the insurance shell, there is a selection process that ensures that the insurance product is assessed on the basis of a number of criteria, including the sustainability risk perspective. The assessment of sustainability risks can consist of various factors, such as how sustainability risks are integrated into investment decisions and how the investment strategy of the insurance product affects the sustainability risks that the product exposed to.</p> <p><b>Guideline sustainability</b></p> <p>The purpose of this guideline is to describe how Roslagens Sparbank, in collaboration with its four foundations, intends to work for sustainable development and take its social responsibility. Sustainability work here is both about living up to legal</p>	<p><a href="#">Riktlinje Hållbarhetsrisker</a></p> <p><a href="#">Riktlinje för bankens hållbarhetsarbete</a></p>
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	<p>requirements and formal rules, as well as taking voluntary measures in the realization of the bank's vision. The guideline shall ensure that the Bank's compliance with:</p> <ul style="list-style-type: none"> <li>• <b>Sustainable finance disclosure regulation (2019/2088)</b> which, among other things, regulates how financial advisors are to inform their investors and clients about sustainability factors</li> <li>• <b>UN Principles for Responsible Banking</b></li> <li>• <b>UN Global Compact</b></li> </ul> <p>This guideline is kept available to the Bank's customers and the public.</p> <p><b>Our preventive work against money laundering</b> The Bank works actively and preventively to thwart the Bank's operations from being used for money laundering and terrorist financing. The bank has a risk-based approach and conducts at least annually a general risk assessment that is determined by the Board of Directors. For the bank to be able to complicate and prevent the business from being used for money laundering and terrorist financing, the bank must have good knowledge of its customers and their business – customer due diligence. Sufficient customer due diligence must be available both at the initiation of business relationships with customers but also on an ongoing basis during the ongoing business relationship. Without sufficient customer due diligence, the bank may not establish or maintain a business relationship or carry out occasional transactions. In order to detect money laundering and terrorist financing, we cooperate with a number of actors, including other banks, government agencies and the Financial Police (FIPO). In recent years, the bank has continuously improved system support, processes, and</p>	<p>See “Stabil bank” on p. 40-41 of our 2021 Sustainability Report</p>
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	<p>procedures, as well as terminated business relationships with customers in cases where we have not been able to ensure that anti-money laundering legislation can be complied with.</p>	
<p>3.2 <i>Describe</i> 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 activities. This should include information on actions planned/implemented, products and services developed, and, where possible, the impacts achieved.</p>	<p>Developing and creating long-term value for the customer is crucial for us. We get input directly in meetings or through our customer centre, but also through customer measurements such as SKI. In 2021, we also added in-depth interviews with the bank's stakeholders linked to sustainability and what the bank should focus on.</p> <p><b>Sustainable lending</b> To us at Roslagens Sparbank, lending must be sound, responsible, and characterized by good risk management, regulatory compliance and a business action towards the customer. It is important to be responsive to the customer's needs, communicate easily and clearly and act so that the bank is perceived as a professional counterparty. This place demands on employees' competence to handle customers with different needs and complexities. Furthermore, the bank's credit portfolio shall be characterised by a low risk profile with an overall low credit risk.</p> <p>We offer sustainable financing and to encourage more environmentally friendly housing, we offer a Green Mortgage to our private customers, where we make an extra deduction of 10 basis points on the mortgage if the home meets the set criteria. We also offer both solar loans and energy loans. On the corporate side, we conduct a Sustainability Analysis on all engagements over SEK 8 million to identify and minimize sustainability-related risks.</p>	<p>See "Våra viktigaste intressenter" on p. 19, Stabil bank p. 38-39 of our 2021 Sustainability Report</p>

	<p><b>Sustainable investments</b></p> <p>To customers of Roslagens Sparbank, we offer a wide range of sustainable funds through Swedbank Robur. Their climate strategy is based on three parts:</p> <p>Include - by investing in companies that actively work for sustainable solutions</p> <p>Exclude - companies with unsustainable businesses, as companies in the coal and oil industries</p> <p>Engage - for a more sustainable business</p>	
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**Principle 4: Stakeholders**

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

4.1 *Describe* which stakeholders (or groups/types of stakeholders) your bank has consulted, engaged, collaborated or partnered with for the purpose of implementing these Principles and improving your bank's impacts. This should include a high-level overview of how your bank has identified relevant stakeholders and what issues were addressed/results achieved.

The bank's sustainability work and development are based on our governance, objectives, external events and customer needs. We take in important input from our stakeholders according to below but also from other important groups in society. The bank conducted a stakeholder analysis in the autumn of 2021 in which all groups below were represented. The stakeholder analysis has formed the basis for the bank's materiality and gap analysis.

**Customers** - Developing and creating long-term value for the customer is crucial for us. We get input directly in meetings or via our customer centre, but also via customer measurements such as SKI. 2021 We also added in-depth interviews with customers linked to sustainability and what the bank should focus on.

**Employees** - Creating an attractive and sustainable workplace with committed employees who feel good and want to contribute together to the bank's goals is crucial for us. We capture their input via ongoing employee surveys, performance appraisals and work environment surveys. We also conducted a broad survey in 2021 and several in-depth interviews to capture employees' views on what we should focus on going forward.

See "Våra viktigaste intressenter" on p. 19 of our 2021 Sustainability Report

	<p><b>Suppliers and partners</b> - We work with our suppliers to refine and improve what we buy in the form of products or services to the bank. The suppliers have a major impact on our footprint and therefore it is important for us to have selection and follow-up. Our largest supplier and partner is Swedbank. We also actively cooperate with the National Association of Savings Banks and have a continuous and good dialogue with the two. We are very positive about their high ambitions in sustainability.</p> <p><b>The municipality, our local community, and associations</b> - Getting ongoing input from the municipality we operate in is important as we want to contribute to an attractive and open Roslagen in growth. By actively participating in various forums, projects, and collaborations, we continuously consider their input.</p> <p><b>Our four foundations</b> – A large part of our community involvement is done through our four foundations. Their input on needs and what they see in different areas such as the school, the municipality's business climate, environmental issues locally, issues around a vibrant countryside and so on is an important piece of the puzzle to know how to focus forward. A given part of our ongoing stakeholder dialogue.</p> <p><b>The principals and the board</b> - A savings bank has no individual owners but operates in and for its area. The highest decision-making body is</p>	
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	<p>therefore the principals. Half of the principals are appointed by Norrtälje Municipality's Municipal Council. They then appoint the remainder to obtain a representative cross-section of the Savings Bank's customers and residents of the municipality. It is the principals who appoint the savings bank's board. Input and dialogue are conducted ongoing and in-depth interviews were conducted in the stakeholder dialogue also with representatives from these groups.</p>	
<div style="display: flex; align-items: center;">  <div> <p><b>Principle 5: Governance &amp; Culture</b>  <b>We will implement our commitment to these Principles through effective governance and a culture of responsible banking</b></p> </div> </div>		
<p>Describe the relevant governance structures, policies and procedures your bank has in place/is planning to put in place to manage significant positive and negative (potential) impacts and support effective implementation of the Principles.</p>	<p>For Roslagens Sparbank, the Board of Directors is ultimately responsible for the bank's sustainability work. In its rules of procedure, the Business and Markets Committee has the task of preparing sustainability issues in depth and reporting to the Board.</p> <p>The Board of Directors is responsible for annually establishing the Bank's sustainability guideline and, if necessary, updating/revising the ambition and/or prioritisation of sustainability work. They shall cooperate with Roslagens Sparbank's foundations for the greatest possible coherence in sustainability Work. They delegate the implementation of the bank's sustainability work to the CEO.</p>	<p>See "Hållbarhetsstyrning" p. 21 of our Sustainability Report 2021</p>

	<p>The CEO is responsible for establishing instructions. Furthermore, the CEO is responsible for producing the Sustainability report and reporting a follow-up including the sustainability work.</p> <p>The bank management makes strategic and operational decisions based on the ambitions and guidelines that are set. In 2022, the integration of this year's developed strategy and gap analysis for sustainability will be integrated into each function and managed in the same way as the bank's goals and follow-up process looks in general. All employees in the bank must work according to and work for the guidelines that are established. In 2022, further steps will be taken to set goals linked to the bank's ambitions and the chosen global goals that will be our focus. A Roadmap is designed to close the gaps that exist between the current situation and our ambition, and each leader will be responsible for the parts that concern their area.</p> <p>Head of Sustainability, Marketing and Communication reports to the CEO and is responsible for developing and facilitating processes for setting goals, follow-up and integrating sustainability into the business. The responsibility also includes being up to date with current legislation and ensuring that we have updated policies, guidelines, and instructions in the area of sustainability. During the year, a sustainability coordinator also strengthened the</p>	
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	<p>team with the goal of continuing to further develop and educate the bank in sustainability.</p> <p>The work against money laundering and terrorist financing exists in addition to the Board of Directors and CEO a specially appointed officers as well as several additional means of control.</p>	
<p>5.1 <i>Describe</i> the initiatives and measures your bank has implemented or is planning to implement to foster a culture of responsible banking among its employees. This should include a high-level overview of capacity building, inclusion in remuneration structures and performance management and leadership communication, amongst others.</p>	<p>Sustainability is a mandatory part of the bank's training plan for employees. The training plan is decided by the bank management. The training will be carried out annually and for new employees there is an additional in-depth training in the field of sustainability. All of the bank's employees are also continuously trained in AML and Ethics.</p> <p><b>The Bank's remuneration policy and sustainability risks</b> The Bank's remuneration policy is based, inter alia, on Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector.</p> <p>The policy defines Sustainability Risk as: An environmental, social, or governance-related event or circumstance that, if it were to occur, would have an actual or potential significant adverse impact on the value of the investment.</p> <p>The Bank's remuneration system shall be consistent with the Bank's sustainability risk guideline. This means that compensation may not be based on or affected by exposure to</p>	<p><a href="#">Regelverk om hållbarhet   Roslagens Sparbank</a></p>

	<p>sustainability risk. Any variable remuneration shall therefore be unrelated to the assumption of sustainability risk. Thus, the employee should not be able to influence his remuneration by taking more or less sustainability risk in connection with investment or insurance advice.</p>	
<p><b>5.2 Governance Structure for Implementation of the Principles</b></p> <p>Show that your bank has a governance structure in place for the implementation of the PRB, including:</p> <ul style="list-style-type: none"> <li>a) target-setting and actions to achieve targets set</li> <li>b) remedial action in the event of targets or milestones not being achieved or unexpected negative impacts being detected.</li> </ul>	<p>Our strategy for responsible and sustainable banking is led by our Board of Directors, which decides on policies and guidelines. It is the Board of Directors that has decided that the Bank shall work in accordance with the principles of responsible banking and the Board continuously monitors the work on the Bank's sustainability work, especially in the Board's Business and Market Committee. In the bank's management by objectives, integrating sustainability into the organization is one of the focus areas for 2022 and sustainability work is also part of the bank's business plan decided by the board.</p> <p>The bank's control functions – internal audit, risk control and compliance – include controls of sustainability work in their annual plans.</p>	
<p>Please provide your bank's conclusion/ statement if it has fulfilled the requirements regarding Governance Structure for Implementation of the Principles.</p>		
<p>With a long history of working with sustainability, we are well placed to meet the requirement to implement the principles. The bank has a good governance structure with continuous follow-up regarding activities and goals both from the board / bank management and from control functions. The bank has a resource that works full-time with sustainability work and the introduction of the principles. The board receives continuous reports on the work and is included with, for example, workshops and training initiatives.</p>		



**Principle 6: Transparency & Accountability**

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

6.1 **Progress on Implementing the Principles**

Show that your bank has progressed on implementing the six Principles over the last 12 months (up to 18 months in your first reporting after becoming a signatory) in addition to the setting and implementation of targets in minimum two areas (see 2.1-2.4).

Show that your bank has considered existing and emerging international/regional good practices relevant for the implementation of the six Principles for Responsible Banking. Based on this, it has defined priorities and ambitions to align with good practice.

Show that your bank has implemented/is working on implementing changes in existing practices to reflect and be in line with existing and emerging international/regional good practices and has made progress on its implementation of these Principles.

In the implementation of the principles, we have started from "*Principles for responsible banking – key steps to be implemented by signatories*".

**Step 1. Impact analyses**

In the impact analysis, we have analysed our impact on society and identified the most important areas where we can make a difference. We have conducted the impact analysis from UNEP to identify our positive and negative impact in our products and sectors we lend to.

To find the areas where the bank can influence the most in the areas of ESG, we initiated a collaboration with KPMG in the autumn of 2021. From there, we've done: - An external analysis – we have gone through how other banks work, what is written in the media and what laws and regulations do we have to relate to.

- **A stakeholder analysis** – we have identified and interviewed nearly 20 stakeholders (partners, customers, employees, board) and conducted a survey of the bank's employees.

- Identified our essential sustainability issues based on ESG, i.e., the issues where we have the greatest opportunity to influence society.

- GAP analysis – We made an analysis of the current situation and our wanted position in all the essential

See "BANKEN SOM ACCELERATOR FÖR HÅLLBAR UTVECKLING" on p. 16-17 of our 2021 Sustainability Report

sustainability issues that we have recognized and identified the gaps.

### **Step 2. Goal formulation and implementation**

- We have started the work of handing over the gap analysis to the respective owners of the sustainability issue.
- The Board has decided on SDGs linked to the essential sustainability issues that we will work towards.
- Integrating sustainability work across the bank is one of the bank's focus areas in performance management for 2022 and is followed up monthly by bank management and quarterly by the board.
- We communicate two of our long-term goals in this document, which we have the ambition to measure and follow up. The targets are being developed and will be followed up within the framework of responsible banking.

Now the work continues to target and formulate activities and KPIs to achieve these goals. We will formulate ambitious measurable goals in the area where the bank has the greatest impact.

### **Step 3. Reporting**

For 13 years, the bank has made a Sustainability report to show our impact on society. Since 2008, we have reported and compensated for our emissions and are affiliated with the Global Compact. The bank has no regular requirement to prepare a Sustainability report due to the size of the bank, but this has been done on its own initiative as we want to work for a transparent bank. The Sustainability

	<p>report is coherent with the annual report but is not audited by an independent party. The Sustainability report is made available to the bank's stakeholders via the website.</p> <p>In its 2021 reporting, the bank has outlined the first steps for the implementation of responsible banking (see step 1). The report for 2022 will include goals and goal fulfillment linked to our SDGs.</p>	
<p>Please provide your bank's conclusion/statement if it has fulfilled the requirements regarding Progress on Implementing the Principles for Responsible Banking</p>		
<p>The Bank believes it has taken major steps forward in implementing the principles of responsible banking.</p>		

#### Annex: Definitions

- a. **Impact:** An impact is commonly understood as being a change in outcome for a stakeholder. In the context of these Principles this means (aligned with GRI definition) the effect a bank has on people/the society, the economy and the environment and with that on sustainable development. Impacts may be positive or negative, direct or indirect, actual or potential, intended or unintended, short-term or long-term.
- b. **Significant Impact:** Impact that in terms of scale and/or intensity/salience results in a particularly strong/relevant change in outcome for a stakeholder. In the context of these Principles, the concept of *significant* impact is used to ensure banks focus where their actions/business (can) matter most for people, economy and environment and to provide a reasonable and practical threshold for what issues need to be considered/included, similar to the concept of "materiality".