Reporting and Self-Assessment Template

Principles for Responsible Banking

Reviewed version (V2) from September 2022
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 Key Steps 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 report.¹

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 Key Steps (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.

**Response**

Our business model is based on the idea of the local Savings Bank, therefore our mission is to help our customers to economic freedom and security. Our main customer segments are private customers and small and medium sized business customers. We operate in three small municipalities (Köping, Arboga and Kungsör) in the middle of Sweden, with a total of approximately 49,000 inhabitants. We offer a wide range of banking services and advice as well as availability and local presence. The idea of the local Savings Bank also includes us giving back money from our profit – to projects, ideas and good, sustainable causes in our region. We have done that since our bank was founded in 1845.

### Strategy alignment

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

- Yes
- No

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

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

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

**Response**
Our banks strategy and mission is to create sustainable and long-term profitability for and together with our customers. The 2030 Agenda for Sustainable Development is our guideline, and we focus on seven of the seventeen goals in our daily operations (goal 3,4,7,9,11,12,16) We have four focus areas that apply to everything we do at the bank – based on the SDGs and the goals previously mentioned. Our employees, the Board of Directors and the bank’s beneficial owners have together defined our sustainability definition: ”We want Köping, Arboga and Kungsör to continue to be positive places to grow up in – for our children, grandchildren and great grandchildren.”

**Links and references**
Sustainability report 2022, page 4

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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 (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 regularly and fulfil the following requirements/elements (a-d):

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

**Response**
Sparbanken Västra Mälardalen first performed an Impact Analysis in 2022, with an update in September 2023. Our bank has a total of 42 500 active customers. 40 000 of them are within consumer banking and 2 500 within business banking. Our business volume is now 30.5 billion, and our total lending volume is 12 billion (7.1 billion within consumer banking, 4.9 billion within business banking)

**Links and references**

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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 Interactive Guidance on impact analysis and target setting.
**b) Portfolio composition:** Has your bank considered the composition of its portfolio (in %) in the analysis? Please provide proportional composition of your portfolio globally and per geographical scope

i) by sectors & industries 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.

If your bank has taken another approach to determine the bank’s scale of exposure, please elaborate, to show how you have considered where the bank’s core business/major activities lie in terms of industries or sectors.

<table>
<thead>
<tr>
<th><strong>Response</strong></th>
<th><strong>Links and references</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>We operate in a small region in Sweden, in the three municipalities Köping, Arboga and Kungsör. We have considered our banks portfolio composition while performing the Impact Analysis. The most dominant sectors within business lending are real estate activities (50%) and agriculture, forestry and fishing (22%). These sectors together represent 72 % of lending within business banking.</td>
<td></td>
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4 ‘Key sectors’ relative to different impact areas, i.e. those sectors whose positive and negative impacts are particularly strong, are particularly relevant here.
c) **Context:** What are the main challenges and priorities related to sustainable development in the main countries/regions in which your bank and/or your clients operate? Please describe how these have been considered, including what stakeholders you have engaged to help inform this element of the impact analysis.

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

**Response**

In our region energy supply is a challenge. Our bank is proactive in this matter, primarily through our work in Västra Mälardalen i Samverkan, a cooperative association in Köping, Arboga and Kungsör. We have recently contributed to new charging posts for cars, we buy locally produced sun energy to complement the energy we get from the solar panels placed on the bank’s own roof.

Another challenge in our region is to recognize sustainability as a matter of cause to a greater extent in people’s everyday lives – this is included in our daily work. As a bank we are obligated to include information about sustainability when opening up/changing saving for our customers. When we meet with our business customers, we perform a sustainability analysis taking into account many different aspects of their company. We aim for this analysis to be more of a conversation/discussion with the purpose to show our customers that the aspect of sustainability is important to us, especially when lending them money.

Within our four focus areas we aim to make sustainability easier to understand. For example “More exercise in Västra Mälardalen” is one of our focus areas. We talk to the associations we sponsor and discuss how their work with children and youths is sustainability to us.

These are our focus areas:
1. Urban centres that are safer and more fun (Goals 11, 12)
2. Even more sustainable development in Västra Mälardalen (Goals 7, 9, 11, 12)
3. More exercise in Västra Mälardalen (Goal 3)
4. Security for children and young people (Goals 3, 4, 16)

As mentioned, we work closely with many associations in our region. We sponsor them, but we also encourage them to work with value base. In this work we have included a third part connected to the Swedish National Sports Federation, to be in charge of the training of the associations.

**Links and references**

Sustainability report 2022, page 4, 5, 6

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

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<tr>
<th>Response</th>
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</thead>
<tbody>
<tr>
<td><strong>Consumer banking</strong></td>
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<tr>
<td><strong>Positive impact areas (the first 5)</strong></td>
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<tr>
<td>Employment</td>
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<tr>
<td>Inclusive healthy economies</td>
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<tr>
<td>Housing</td>
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<tr>
<td>Mobility</td>
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<tr>
<td>Health &amp; sanitation</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Negative impact areas</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Inclusive, healthy economies</td>
</tr>
<tr>
<td>Resources efficiency/security</td>
</tr>
<tr>
<td>Climate</td>
</tr>
</tbody>
</table>

| **Business banking** |
| **Positive impact areas (the first 5)** |
| Health & sanitation |
| Culture & Heritage |
| Housing |
| Education |
| Employment |

<table>
<thead>
<tr>
<th><strong>Negative impact areas (the first 5)</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Climate</td>
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<tr>
<td>Waste</td>
</tr>
<tr>
<td>Resources efficiency/security</td>
</tr>
<tr>
<td>Biodiversity &amp; ecosystems</td>
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<tr>
<td>Culture &amp; heritage</td>
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</tbody>
</table>

Inclusive, healthy economies + Health & sanitation are two of the impact areas we prioritized when setting targets. But we also feel that Education and Resources efficiency/security are important when our targets were decided.

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

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

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

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

<table>
<thead>
<tr>
<th><strong>Response</strong></th>
<th><strong>Links and references</strong></th>
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</thead>
<tbody>
<tr>
<td>Our bank’s most extensive sustainability impact occurs indirect through lending. Therefore, it is extremely important to highlight that responsibility and a long-term approach are keys for Sparbanken Västra Mälardalen when it comes to lending. Through sound, high-quality lending, we can contribute to creating good conditions for companies to build and develop their business. It is important to us that our business customers have a sustainability perspective in their operations and that they have business plans that support sustainable development. It is also important to us to give our private customers the opportunity to create a long-term, healthy economy and security – all in the spirit of sustainability.</td>
<td>Sustainability report 2022, page 2</td>
</tr>
</tbody>
</table>
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? 

<table>
<thead>
<tr>
<th>Component</th>
<th>Yes</th>
<th>In progress</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scope</td>
<td>☒</td>
<td></td>
<td></td>
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<tr>
<td>Portfolio composition</td>
<td>☒</td>
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<tr>
<td>Context</td>
<td>☒</td>
<td></td>
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<tr>
<td>Performance measurement</td>
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Which most significant impact areas have you identified for your bank, as a result of the impact analysis?

*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*

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

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

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

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

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

You can build upon the context items under 2.1.

Response

The strategy for Sparbanken Västra Mälardalen up until the year 2030 is expressed this way:

We want loyal, long-term relations with our customers. This means increased commitment to our bank; more products, suitable products and focus on personal relations. We aim for our bank to grow each year, because we want to increase the amount we give back to good, developing, sustainable projects and ideas in our region. From 2030 we hope to give back 10% of our profit yearly.

With this taken into consideration, as well as the 2030 Agenda for Sustainable Development, and our focus on seven of the seventeen goals, these are our two targets:

1. **Increase savings among youths/young adults**
   (Focus area 2 and 4)

2. **Increase sustainable development in Västra Mälardalen**
   by giving back more money each year to sustainable projects/ideas
   (All focus areas – mainly focus area number 2)

As mentioned in 2.1c – the impact areas prioritized when setting these targets are: **Inclusive, healthy economies, Health & sanitation, Education** and **Resources efficiency/security**.

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.

Links and references

Sustainable report 2022, page 4
A package of indicators has been developed for climate change mitigation and financial health & inclusion to guide and support banks in their target setting and implementation journey. The overview of indicators can be found in the Annex of this template.

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

<table>
<thead>
<tr>
<th>Impact area</th>
<th>Indicator code</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Climate change mitigation</td>
<td>...</td>
<td>...</td>
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<table>
<thead>
<tr>
<th>Impact area</th>
<th>Indicator code</th>
<th>Response</th>
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</thead>
<tbody>
<tr>
<td>Financial health &amp; inclusion</td>
<td>...</td>
<td>...</td>
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</tbody>
</table>

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

Response
These two targets have recently been set. September 2023 is therefore our baseline.

Current level of alignment:
**Increase savings among youths/young adults** – we teach young people private economy (visiting schools in Köping, Arboga, Kungsör), we support entrepreneurship skills in schools, in cooperation with Ung Företagsamhet in our region in Sweden.

See appendix 1.

**Increase sustainable development in Västra Mälardalen by giving back more money each year to sustainable projects/ideas** – we are planning to increase this amount year by year – in 2023 we give back approximately 5% of our profit. We aim to give back 10% in 2030.

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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.
c) **SMART targets** (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.

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<tr>
<th>Response</th>
<th>Appendix 1</th>
<th>Links and references</th>
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</table>

d) **Action plan**: 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.

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<thead>
<tr>
<th>Response</th>
<th>Appendix 1</th>
<th>Links and references</th>
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</table>

### 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…

<table>
<thead>
<tr>
<th>… first area of most significant impact: …</th>
<th>… second area of most significant impact: …</th>
<th>… first area of most significant impact: …</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Increase savings among youths</strong></td>
<td><strong>Increase sustainable development in Västra Mälardalen by giving back more money each year to sustainable projects/ideas</strong></td>
<td><strong>Alignment</strong></td>
</tr>
<tr>
<td>☒ Yes</td>
<td>☒ Yes</td>
<td>☒ Yes</td>
</tr>
<tr>
<td>☐ In progress</td>
<td>☐ In progress</td>
<td>☐ In progress</td>
</tr>
<tr>
<td>☐ No</td>
<td>☐ No</td>
<td>☐ No</td>
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<table>
<thead>
<tr>
<th><strong>Baseline</strong></th>
<th><strong>SMART targets</strong></th>
<th><strong>Action plan</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>☒ Yes</td>
<td>☒ Yes</td>
<td>☐ Yes</td>
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<tr>
<td>☐ In progress</td>
<td>☐ In progress</td>
<td>☐ Yes</td>
</tr>
<tr>
<td>☐ No</td>
<td>☐ In progress</td>
<td>☐ No</td>
</tr>
</tbody>
</table>

\(^{10}\) Key Performance Indicators are chosen indicators by the bank for the purpose of monitoring progress towards targets.
2.3 Target implementation and monitoring (Key Step 2)

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

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

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

Response
We have decided on our targets in the fall of 2023. And since the targets are new for 2023, we can not report on progress yet.
### Principle 3: Clients and Customers

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

#### 3.1 Client engagement

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

<table>
<thead>
<tr>
<th></th>
<th>Yes</th>
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*Does your bank have a policy for sectors in which you have identified the highest (potential) negative impacts?*

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<thead>
<tr>
<th></th>
<th>Yes</th>
<th>In progress</th>
<th>No</th>
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</table>

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 activities. 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).*

<table>
<thead>
<tr>
<th>Response</th>
<th>Links and references</th>
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<tbody>
<tr>
<td><strong>Response</strong>&lt;br&gt;Business customers:&lt;br&gt;As mentioned, when we meet with our business customers we perform a sustainability analysis taking into account many different aspects of their company. We aim for this analysis to be more of a conversation/discussion with the purpose to show our customers that the aspect of sustainability is important to us, especially when lending them money. This analysis is regularly updated, and we aim for it to feel natural and be a way for us to highlight that sustainability is a prerequisite for our engagement with the customer.&lt;br&gt;&lt;br&gt;We work every day to increase the knowledge of sustainability. We inform our private customers about sustainability when opening up/changing savings.&lt;br&gt;&lt;br&gt;Regarding the associations that we sponsor, we discuss sustainability, mostly with emphasis on our four focus areas. They have to show how they work with sustainability in order for us to sponsor them. The associations have been pleased with the work we initiated about value base. This is something we will continue</td>
<td><strong>Links and references</strong></td>
</tr>
</tbody>
</table>
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 groups) you have identified as relevant in relation to the impact analysis and target setting process?

- ☐ Yes
- ☒ In progress
- ☐ No

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

**Response**

Our bank has several relevant stakeholders.

- Clients
- Employees
- Associations
- Partners

In the last 12 months we have consulted the associations we cooperate with (work with value base, see 2.1c), and also our business customers (as previously mentioned; the sustainability analysis). We are also involved in discussions with our three municipalities regarding energy supply, now and in the future. This work is done within the cooperative association Västra Mälardalen i Samverkan, where the bank plays a significant role.

In our yearly customer surveys we always include questions about sustainability in order to improve.

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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 the Principles

Does your bank have a governance system in place that incorporates the PRB?
- ☐ Yes
- ☒ In progress
- ☐ No

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

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

**Response**
Sparbanken’s Board of Directors has overall responsibility for the governance structures, and also for implementing the principles. We also have a credit- and sustainability committee.

**Links and references**
Sustainability report 2022, page 9

### 5.2 Promoting a culture of responsible banking:

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

**Response**
We held a workshop about sustainability with all employees (in smaller groups) during fall 2021. We are now planning to do a follow-up on this. All employees attend courses and trainings regularly as a natural part of our business development as a bank. Sustainability is incorporated in everything we do at the bank.

**Links and references**

### 5.3 Policies and due diligence processes

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

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

Response
We make continuous risk assessments to identify, assess and manage risks of money laundering, financing of terrorism, and corruption in the operations. The aim of these risk assessments is to generate awareness of and evaluate the risks, and to establish a foundation for reducing the risk of the bank being used for criminal activities or enabling the financing of terrorism. There is an established “know your customer” (KYC) process, and anti-corruptions work permeates the bank’s business processes and is integrated into the risk assessment of credit, the supply chain, payment flows and investments. All employees are continuously trained to recognise transaction patterns, behaviours and situations that involve, or have a connection with, money laundering and corruption.

Our bank also has several policies supporting this work. These are all in Swedish though.

Links and references
Sustainability report 2022, page 9

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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.
### Principle 6: Transparency & Accountability

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

#### 6.1 Assurance

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

- ☒ Yes
- ☐ Partially
- ☐ No

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

<table>
<thead>
<tr>
<th>Response</th>
<th>Links and references</th>
</tr>
</thead>
<tbody>
<tr>
<td>Appendix 2.</td>
<td></td>
</tr>
</tbody>
</table>

#### 6.2 Reporting on other frameworks

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

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

<table>
<thead>
<tr>
<th>Response</th>
<th>Links and references</th>
</tr>
</thead>
<tbody>
<tr>
<td>The international standard Global Reporting Initiative (GRI) serve as inspiration and guidance in the work of preparing our sustainability report. We are not yet, by law, obligated to have a sustainability report, but we published our first in 2021 and our second in 2022.</td>
<td></td>
</tr>
</tbody>
</table>

#### 6.3 Outlook

What are the next steps your bank will undertake in next 12 month-reporting period (particularly on impact analysis\(^\text{15}\), target setting\(^\text{16}\) and governance structure for implementing the PRB)? Please describe briefly.

\(^{15}\) 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.
<table>
<thead>
<tr>
<th><strong>Response</strong></th>
<th><strong>Links and references</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>We will focus on different activities to reach our targets. Since 2023 is our baseline regarding targets, we see this as a starting point, and we need to set different milestones. We plan to hold workshops with our employees, to discuss sustainability and we will need to form a structure for measuring our targets.</td>
<td></td>
</tr>
</tbody>
</table>
6.4 Challenges
Here is a short section to find out about challenges your bank is possibly facing regarding the implementation of the Principles for Responsible Banking. Your feedback will be helpful to contextualise the collective progress of PRB signatory banks.

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

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

☒ Embedding PRB oversight into governance  ☐ Customer engagement
☐ Gaining or maintaining momentum in the bank  ☐ Stakeholder engagement
☒ Getting started: where to start and what to focus on in the beginning  ☐ Data availability
☐ Conducting an impact analysis  ☐ Data quality
☐ Assessing negative environmental and social impacts  ☐ Access to resources
☐ Choosing the right performance measurement methodology/ies  ☐ Reporting
☒ Setting targets  ☐ Assurance
☐ Other: …  ☐ Prioritizing actions internally

If desired, you can elaborate on challenges and how you are tackling these:
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. 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 targets (highlighted in green) or to client engagement (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. 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.

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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 levels of practice (i.e. from left to right), in which case you should report on all applicable indicators on the respective level of practice no matter if it is an action, output or outcome indicator.
For Signatories of the Net-Zero Banking Alliance: please report on the climate targets set as required in the Guidelines for Climate Target Setting. As a member of the Alliance, you are required to publish first 2030 targets for priority sectors within 18 months and further sectoral targets within 36 months after signing. You can use the PRB template to disclose the required climate target information if its publication date is in line with the committed NZBA timeframe.

For Signatories of the Collective Commitment to Financial Health & Inclusion: please report on financial health and/or financial inclusion targets set as required in the Financial Health and Inclusion Commitment Statement. As a signatory to the Commitment, you have agreed to set a SMART ambitious target within 18 months after signing. To facilitate your process, please refer to the Guidance on Target Setting for Financial Health and Inclusion and the Core Indicators to measure financial health and inclusion. Keep in mind that signatories of the Commitment are encouraged to measure as many indicators as possible from the Core Set or their equivalent to be able to set a SMART impact driven target.
| Impact area | Practice (pathway to impact) | 1. Action indicators | 2. Output indicators | 3. Outcome indicators | Impact

|------|----------|---------------------------|------|----------|---------------------------|------|----------|---------------------------|------|----------|---------------------------|
| 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 CO₂e (or applicable metrics)

| 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; | 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) |

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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.
<table>
<thead>
<tr>
<th>A.1.3 Policy and process for client relationships:</th>
<th>Yes / In progress / No</th>
<th>A.2.3 Sector-specific emission intensity (per clients' physical outputs or per financial performance):</th>
<th>Please specify which sector (depending on the sector and/or chosen metric): kg of CO₂e/kWh, CO₂e/m², kg of CO₂e/USD invested, or kg of CO₂e/revenue or profit</th>
</tr>
</thead>
<tbody>
<tr>
<td>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?</td>
<td></td>
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</table>

| A.1.4 Portfolio analysis: | Yes / In progress / No; | A.2.4 Proportion of financed emissions covered by a decarbonization target: | | % (denominator: financed emissions in scope of the target set) |
|--------------------------|------------------------|-----------------------------|---------------------------|
| 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? | If yes: please specify which parts of the lending and investment portfolio you have analyzed | What proportion of your bank’s financed emissions is covered by a decarbonization target, i.e. stem from clients with | |

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24 A list of carbon-intensive sectors can be found in the [Guidelines for Climate Target Setting](https://www.unenvironment.org).  
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.
<p>| A.1.5 | <strong>Business opportunities and financial products:</strong> 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.1.1 | <strong># of products and services in the portfolio with a focus on financial health</strong> | 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. | <strong># of individuals supported with dedicated and effective financial and/or digital education initiatives</strong> | 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.1.2 | <strong>% of individuals with a good and/or very good level of financial skills</strong> | 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. | <strong>% of customers with a high level of financial health</strong> | 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. |</p>
<table>
<thead>
<tr>
<th>B.1.2</th>
<th>% of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health</th>
</tr>
</thead>
<tbody>
<tr>
<td>Based on internal data. Measures the percentage of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health. Including training to attend the needs of prioritized groups. Effective means that the bank has measured if the initiative is successful in generating the desired results of stronger financial skills, and thus, any individual that is supported with the initiative will achieve the desired results. A bank cannot 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.</td>
<td>B.2.2 % of customers actively using the online/mobile banking platform/tools</td>
</tr>
<tr>
<td>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</td>
<td>B.3.2 % of customers who use the bank’s services to create a financial action plan with the bank</td>
</tr>
<tr>
<td>Transactional and/or survey data based. Measures the percentage of customers who create a financial action plan with the bank using the bank’s services. A financial action plan is anything that helps the customer build financial resilience. It is done “with the bank” if the bank can visualize,</td>
<td>B.4.2 % of customers for which spending exceeded 90% of inflows for more than 6 months last year</td>
</tr>
<tr>
<td>Survey and/or transactional data based. Measures the percentage of customers with a transaction account and/or savings/investment accounts for which spending exceeded 90% of inflows for more than 6 months in the year within the reporting period compared to the total of customers within PRB scope. Focus on main</td>
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</tr>
</tbody>
</table>
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.

### 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.3.4 % of customers with a non-performing loan

Transactional data based. Measures the percentage of customers with past-due loans ("past due")

### B.4.3 % 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.4.4 % of customers with products connected to long-term saving and investment plans

Transactional and/or survey data based. Measures the percentage of customers with products
defined by policies at each bank) compared to the total amount of customers with loans in the bank’s lending portfolio.

connected to long-term saving and investment plans. “Long-term” will depend on each bank’s definition.

<p>| B.3.5 | % of customers showing an increase or stable amounts in savings, deposit and/or investment account balances, quarter on quarter. | Transactional data based. Measures the percentage of customers showing an increase or stable amounts in savings and/or deposit AND/OR investment accounts balances, quarter on quarter. | B.4.5 | % of customers that would struggle to raise emergency funds or cover with insurance a major unexpected expense. Survey based data. Measures the percentage of customers that would struggle to raise emergency funds or cover with insurance a major unexpected expense. We consider a major unexpected expense, one that the customer hadn’t planned for and would require them to spend more than what they have available for secondary expenses in their monthly budget or 1/20th 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. |
| 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 sim-based 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.4.1 | % 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/payment, 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. |</p>
<table>
<thead>
<tr>
<th>C.1.2</th>
<th>% of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health</th>
<th>Based on internal data. Measures the percentage of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health. Including training to attend the needs of prioritized groups. Effective means that the bank has measured if the initiative is successful in generating the desired results of stronger skills, and thus, any individual that is supported with the initiative.</th>
</tr>
</thead>
<tbody>
<tr>
<td>C.2.2</td>
<td>% of customers with effective access to a basic banking product</td>
<td>Transactional data based. Measures the percentage of customers with effective access to a basic banking product. By effective we mean the usage beyond first access. Basic banking products vary by bank. Good examples are: checking accounts, payment accounts, credit cards, saving accounts, deposit accounts, e-</td>
</tr>
<tr>
<td>C.3.2</td>
<td>% of customers supported with dedicated customer journey/advisory services</td>
<td>Transactional data based. Where dedicated customer journey/advisory services are in place for prioritized groups, this indicator measures the percentage of customers using such services. Depending on size of bank, either number or percentage can be the unit of measure.</td>
</tr>
<tr>
<td>C.1.4</td>
<td># of partnerships active to achieve financial health and inclusion targets</td>
<td>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.</td>
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</tr>
<tr>
<td>C.2.3</td>
<td># of new customers per month</td>
<td>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.</td>
</tr>
<tr>
<td>C.3.3</td>
<td>% of customers actively using the online/mobile banking platform/tools</td>
<td>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)</td>
</tr>
</tbody>
</table>