

# Investor Relations Policy



*May 2025*

## Investor Relations Policy Sparebanken Norge

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## INVESTOR RELATIONS POLICY

Sparebanken Norge annually assesses whether the bank's policy for investor relations (IR) is in line with the relevant laws and regulations, and with the Norwegian Code of Practice for Corporate Governance (from NUES) and the Oslo Børs Code of Practice for IR.

The notes below describe how Sparebanken Norge complies with the Oslo Børs Code of Practice for IR of 1 March 2021.

### 1 LANGUAGE

Performance reports and presentations, and any other price-sensitive information, will be published in both Norwegian and English at the same time. In case of doubt, the Norwegian version will apply.

*Deviations from section 1 of the Code of Practice for IR: None*

### 2 PUBLICATION OF INFORMATION

#### 2.1 Annual reports, half-yearly reports and other interim reports

Annual and quarterly reports are published according to the advertised financial calendar. The bank's board of directors will normally approve financial reports after the stock exchange closes, for publication before the exchange opens on the next trading day.

The half-yearly report and interim reports for the first, third and fourth quarter are published as soon as possible, and no later than 45 days after the end of the accounting period. The annual report is normally published within three months of the end of the accounting period, unless otherwise announced in the financial calendar.

The interim reports are submitted in accordance with IFRS accounting standards.

*Deviations from section 2.1 of the Code of Practice for IR: None*

#### 2.2 Information on future prospects/guiding etc.

Matters concerning future prospects/guiding are regularly related to circumstances that have not yet happened or are not yet finalised. This information may create expectations in the market. Differences between the actual financial results and what the company has previously communicated, as well as changes to previously published future prospects/guiding, may be subject to the duty of disclosure.

Other information deemed to be inside information must be published immediately, regardless of the opening hours of the stock exchange, unless the conditions for deferred disclosure are met.

As a general rule, Sparebanken Norge will not guide the market on future performance or results but will publish selected financial targets in the medium and long term, report developments in relation to these and update these targets where relevant.

*Deviations from section 2.2 of the Code of Practice for IR: None*

### 3 INFORMATION ON THE COMPANY WEBSITE

The Bank's distribution channels for financial information to investors and the market are the "Investor Relations" area on the Bank's website and stock exchange announcements.

### **3.1 Corporate governance**

#### **3.1.1 Investor relations policy**

Sparebanken Norge follows the Oslo Børs Code of Practice for IR of 1 March 2021. This is available in the “Corporate governance” area.

#### **3.1.2 The articles of association of the company**

The bank’s articles of association can be found in the “Corporate governance” area of the Investor Relations-pages.

#### **3.1.3 Board of directors and senior executives**

An overview of the board and senior management, with brief CVs and numbers of equity certificates in Sparebanken Norge, is provided in the “Corporate governance” area of the Investor Relations-pages.

#### **3.1.4 Policy for corporate governance**

Sparebanken Norge’s overall principles for corporate governance are defined in the “Corporate governance” area under the “About corporate governance” tab. The annual report on corporate governance required pursuant to the Oslo Børs Issuer Rules is an integrated part of the annual report. This is in accordance with the Code of Practice from the Norwegian Corporate Governance Board (NUES) of 14 October 2021.

#### **3.1.5 Sustainability and corporate social responsibility**

Corporate social responsibility and sustainability are central to the bank’s corporate governance. Corporate governance is held in a separate area and both “Sustainability” and “Corporate social responsibility” have separate tabs under the “Corporate governance” headline.

*Deviations from section 3.1 of the Code of Practice for IR: None.*

### **3.2 The equity certificate**

#### **3.2.1 Holders of equity certificates**

A daily updated list of the bank’s 20 largest holders is held under “Equity certificate” heading item “Largest owners”. The list shows the number of equity certificates and percentage holding.

#### **3.2.2 Beneficial owners**

The bank will, at least once a year, publish a list of beneficial owners. This is also in accordance with regulations on access to the register of shareholders, the register of shareholders and nominee-registered shares. The information will be provided under the “Corporate governance” headline and item “Other documents”.

#### **3.2.3 Price information**

Sparebanken Norge is listed on Oslo Børs under ticker “SBNOR”. Price information allowing for comparison with the benchmark index, as well as volume, order depth and latest transactions, is available under the “Equity certificate” heading and item “Price information”.

#### **3.2.4 Analyst coverage and consensus estimates**

Analysts who follow the company, and their contact information, are listed in “Analyst coverage” under the “Equity certificate” headline.

The bank does not pay for research from external parties.

The bank does not publish consensus estimates based on input from analysts.

### **3.2.5 Notifiable primary insider trades**

A list of notifiable trades in the last 12 months can be found under the heading "Equity certificate" and item "Trades primary insiders". If no primary insider trades took place in the last 12 months, this must be posted.

### **3.2.6 Flagging announcements**

A list of flagging announcements in the last 12 months can be found under the heading "Equity certificate" and item "Major shareholding notifications". If no flagging announcements were issued during the last 12 months, this must be posted.

### **3.2.7 General information about the equity certificate**

The following information is provided on the Investor Relations pages.

Information on the type of legal entity and the national jurisdiction under which the company is incorporated.

*The information can be found under the "About corporate governance" headline.*

The number of shares/equity certificates issued

*The information can be found under the "Price information" headline.*

Number of shares/equity certificates owned by the company or by other group companies.

*The information can be found under the "About the equity certificate" headline.*

Information on whether the company has more than one class of shares

*The bank only has one class of shares*

Information on the marketplace/marketplaces on which the company's shares are listed.

*The information can be found under the "Price information" headline.*

*Deviations from section 3.2 of the Code of Practice for IR: None*

## **3.3 Information for holders of equity certificates**

### **3.3.1 General Meeting**

Documentation for and minutes of the last three years' (annual and extraordinary) meetings of the General Meeting ("committee of representatives" in the Code of Practice) can be found under the "Corporate governance" headline and item "General Meeting"

### **3.3.2 Dividends**

The dividend policy, and the dividend amounts for the last three years, is described under "Dividend policy" under the heading "Equity certificate".

### **3.3.3 Prospectuses**

Prospectuses and information documents prepared in the last ten years are held under "Other documents" under the Corporate Governance heading.

### **3.3.4 The company's VPS account manager**

Sparebanken Norge is itself the account manager in VPS.

Contact information: Jonsvollsgaten 2, 5011 Bergen, Norway [spvkapitalmarked@spv.no](mailto:spvkapitalmarked@spv.no)

This information can also be found under the “Equity certificate” headline and item “About the equity certificate”.

*Deviations from section 3.3 of the Code of Practice for IR: None*

### **3.4 External capital**

#### **3.4.1 Financial strategy**

Sparebanken Norge’s financial strategy is described in “Funding strategy”, under “Debt investors” (Figure 1).

#### **3.4.2 The company’s debt financing**

The Bank’s debt financing with details of sources of financing, agreements and description of loans, is listed under heading “Debt information” and items “Bond Loans and EMTN Programme” and “Sparebanken Norge Boligkreditt”.

Sparebanken Norge’s credit rating is also described under the same heading, item “Rating”.

*Deviations from section 3.4 of the Code of Practice for IR: None*

### **3.5 Reports and company announcements**

Published interim reports for the current year, as well as the five preceding years at a minimum, are available under “Reports and presentations”. The same applies to the last five years’ annual reports.

Stock exchange announcements can be found under the heading “Financial information” and the item “Statements to Oslo Stock Exchange”.

*Deviations from section 3.5 of the Code of Practice for IR: None*

### **3.6 Presentations**

Presentations given in connection with annual and interim reports as well as capital markets days must be open to all. All presentations and capital markets days are also streamed live, on a link available through the Investor Relations-pages (“Webcast”). The presentation material is published beforehand on the bank’s investor relations pages under heading “Financial information” and item “Reports and presentations”.

Other presentations from management with financial and strategic content are published on the Bank’s website in the same place as interim and annual reports.

The Bank aims to hold investor meetings and conference calls in English in the first few days after the results presentation.

*Deviations from section 3.6 of the Code of Practice for IR: None*

### **3.7 Financial calendar**

Sparebanken Norge’s financial calendar provides a list of dates for financial reporting, dates of Supervisory Board meetings and dividend payments.

The Bank has a defined silent period from the fifth banking day in a new quarter until the quarterly report is published. During this period, there will be essentially no contact between Investor Relations and the press, investors, analysts or other market participants.

*Deviations from section 3.7 of the Code of Practice for IR: None*

### **3.8 Contact details**

The bank's spokespersons for investors and analysts are the CFO and defined IR resources. They are also referred to on the bank's investor relations page.

*Deviations from section 3.8 of the Code of Practice for IR: None*

## **4 COMMUNICATION USING OTHER CHANNELS**

### **4.1 Social media**

Sparebanken Norge generally states that social media should not be used to distribute financial information. Where social media are used to follow up financial information that has already been announced, this should be done in a careful and balanced tone and in a way which is not liable to mislead. Notifiable information must always be published in accordance with applicable regulations prior to being published in social media or via other channels.

*Deviations from section 4.1 of the Code of Practice for IR: None*

### **4.2 Contacts with analysts and equity research**

The bank attaches great importance to correct, relevant and timely information on the bank's performance and earnings, creating trust vis-à-vis the market. Price sensitive information from the Bank shall reach all market participants at the same time.

The bank will not provide analysts with inside information, nor provide any such information in advance of publication. Nor will the bank provide information to a recipient that undertakes not to use the information prior to publication. The bank will also exercise caution in terms of the information it communicates and will ensure that it does not communicate information that taken together could be of material importance and thus give the analyst an advantage.

Joint presentations are urged to be arranged for all analysts, and all analyst conferences should be open. Information to analysts should be made available to all interested parties via the company's website.

The bank will not comment directly on estimates and analyses. If the bank thinks that the forecasts of analysts or the market as a whole are too high or too low and it wishes to draw attention to this, this must take the form of a stock exchange announcement. It is, however, acceptable to point out concrete factual errors in relation to matters that the bank itself has previously disclosed where these have been used for research and estimates.

The bank will be cautious about distributing or publishing analysts' reports.

Analysts who follow the bank's equity certificate are listed on the investor relations pages under heading "Equity certificate" and item "Analyst coverage".

*Deviations from section 4.2 of the Code of Practice for IR: None*