

SpareBank 1 Markets AS Remuneration Policy

SpareBank 1 Markets AS ("SB1M") follows regulations on remuneration arrangements in holding companies in financial services, banks, financial institutions, insurance companies, pension institutions, investment firms and management companies for investment funds ("Forskriften"). According to the EU Disclosure Regulation ("SFDR"), included in the Sustainable Finance Act, financial market participants and financial advisers shall integrate all relevant financial risks in their investment advice, including how companies' remuneration policies take into account sustainability risks. In the following SB1M will inform how the company complies with this.

Competent and dedicated co-workers is the key to create value for SB1M's clients and hereby contribute to the company's long-term development. SB1M's remuneration model ought to be in correlation with the market, contribute to sustainable results and the long-term interests of the shareholders. The company's remuneration model should reward individual performance and encourage long-term value creation combined with balanced risk-taking. The remuneration model includes all compensation, including fixed salary, variable remuneration, pension schemes, benefits in kind and more.

When assessing the remuneration of the individual employee, each employee will be assessed against pre-defined goals that covers both financial and non-financial performance. When assessing the employee's total compensation, including variable remuneration, this is done based on the employees' individual goal achievements, the departments result, as well as the company's overall profitability.

In order to prevent employees with leadership responsibilities, control functions, as well as employees who may significantly affect SB1M's risk profile from having undesirable risk behaviour, these are withheld at least 40 per cent of their possible remuneration for three years. The variable remuneration will be invested in stocks/equity certificates in SpareBank 1 SMN ("MING"), SpareBank 1 SR-Bank ("SRBNK"), and SpareBank 1 Nord-Norge ("NONG") and transferred to the employee by one fourth each year, over four years, after a specific assessment.

Integration of sustainability is included in SB1M's compensation policy. Variable compensation must not be composed in a way that encourages unacceptable risk-taking, including ESG risk.

The board has approved the company's remuneration model and will monitor its effects. Furthermore, SB1M has established a Remuneration committee that will monitor compliance with the company's remuneration policy on the behalf of the board. The company's internal auditor KPMG conducts an annual independent audit of SB1M's remuneration model, as well as its compliance, and reports directly to the company's board.