

Marketing Policy – SpareBank 1 Nord-Norge

Our marketing shall conform to good marketing practices and always comply with the relevant laws, regulations, guidelines and industry standards for this area.

Our marketing activities shall comply with the Bank's Code of Conduct (SNN code).

Products and services shall be marketed in a way that informs customers of both their advantages/possibilities and disadvantages/limitations.

"Good marketing practice" means marketing that does not violate general ethical and moral perceptions and does not use offensive or intrusive measures that are otherwise discriminatory.

We will always apply the 'better safe than sorry' principle in all marketing communications. We will practise a high degree of diligence in relation to the ethical and moral responsibilities we have in our marketing of the Bank's products and services.

Our marketing shall never target vulnerable groups with offers of products that could increase their vulnerability, such as offering credit cards or consumer loans to customers with a high level of unsecured debt or similar.

Marketing specifically targeted at children and young people shall be avoided.

All data-based communications activities shall comply with the applicable rules for marketing and privacy protection and be in line with the consents each customer has given.

An internal framework for documenting marketing activities will be established. This framework shall always be used, and assessments of the individual activities will be documented using a specific form. Difficult issues will be clarified with the Legal Department.

We will protect customer privacy according to current laws and regulations.

Our marketing will be based on good insights and analysis to ensure that our communications with customers are as relevant as possible.

All use of artificial intelligence and advanced data analysis will be pursuant to applicable rules, relevant industry norms, and general standards for ethical and proper use of artificial intelligence and advanced data analysis.

Our content marketing is intended to build long-term relationships. We do this by creating relevant, useful and credible content for different phases of a customer's life.

When using advertising products within marketing, sponsorship, or events the relevant department must always adhere to the bank's purchasing policy.

All of our communications will take place on digital platforms to avoid using paper-based production.

When we market the Bank's sustainability work, we will always focus on not 'greenwashing' our services and products such that they appear better than they actually are. Both the marketing and promotion of our sustainability message shall be fact-based.

Our communications about sustainability shall – in terms of the content and aims – motivate, support, and facilitate our customers in making sustainable choices in their lives.

Our sponsorship work shall also focus on ensuring that those we sponsor shall work to incorporate good sustainable solutions into their activities. This is a requirement for sponsorship from us. We shall also specifically focus on exclusion in our work with children and young people in our sponsorship work.

The Bank's Marketing Director is responsible for the Bank's Marketing Policy.