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## General Information

### About the COP Self-assessment


Using this online questionnaire you will have the opportunity to assess what commonly accepted best practice your COP describes under each of the GC Advanced criteria, in the following areas:

- Corporate Sustainability Governance & Leadership
- Implementing the Ten Principles into Strategies & Operations in the areas of:

Human Rights  
Labour  
Environment  
Anti-Corruption

- UN goals and issues

In order for your COP to qualify for the GC Advanced level, you must select at least one best practice for each of the criteria. If you do, the COP will automatically qualify for the GC Advanced level and the results of the self-assessment will be made public on the Global Compact website, alongside your COP. If you cannot confirm, the COP will be accepted but it will not qualify for the GC Advanced level. However, the results of the self-assessment will be made public on the Global Compact website, alongside the COP, to improve the analysis of the COPs and underlying performance.

Note: Throughout the self-assessment, best practices marked with  indicate additional information is available for that item.

### Communication Title

Please enter a short title for your submission.

Communication on Progress 2020 - SpareB

### The Communication on Progress is in the following format:

- ☐ Stand alone document
- ☐ Part of a sustainability or corporate (social) responsibility report
- ☒ Part of an annual (financial) report

### What is the time period covered by your COP?

Start date

End date

October 2019 December 2020

Does your COP contain a statement by the CEO (or equivalent) expressing continued support for the Global Compact and renewing your company's ongoing commitment to the initiative and its principles?

- ☐ Yes
- ☒ No

Does your COP contain a description of actions, and when relevant policies, related to the following issue areas?

Human Rights	Labour	Environment	Anti-Corruption
<input checked="" type="radio"/> Yes	<input checked="" type="radio"/> Yes	<input checked="" type="radio"/> Yes	<input checked="" type="radio"/> Yes
<input type="radio"/> No	<input type="radio"/> No	<input type="radio"/> No	<input type="radio"/> No

Does your COP include qualitative and/or quantitative measurement of outcomes illustrating the degree to which targets/performance indicators were met?

- ☒ Yes
- ☐ No

How does your organization share its COP with stakeholders?

- ☐ a) Through the UN Global Compact website only
- ☒ b) COP is easily accessible to all interested parties (e.g. via its website)
- ☐ c) COP is actively distributed to all key stakeholders (e.g. investors, employees, consumers, local community)
- ☐ d) Both b) and c)

The Global Compact recognizes that there are various options in terms of external assessment. High-quality external assessment should ideally encompass qualitative and quantitative information and performance data in the COP, as well as an explanation of the management systems and processes that foster their credibility.

A credible third-party is defined as groups or individuals external to the reporting organization who are demonstrably competent in the subject matter and eligible to provide feedback on the basis of their role towards the company and their independent position. For guidance on the assurance process, companies may refer to Your Path to External Assessment.

**How is the accuracy and completeness of information in your COP assessed by a credible third-party?**

- ☐ Other established or emerging best practices ⓘ
- ☒ Information is assured by independent assurers (e.g., accounting or consulting firm) against recognized assurance standard (e.g., ISAE3000, AA1000AS, other national or industry-specific standard)
- ☐ Information is assured by independent assurers (e.g., accounting or consulting firm) using their own proprietary methodology
- ☐ Information is reviewed by a panel of peers (e.g., members of the same industry, competitors, benchmarked leaders, others organized via Global Compact Local Network)
- ☐ Information is reviewed by multiple stakeholders (e.g., representatives of groups prioritized in stakeholder analysis)
- ☐ The COP describes any action(s) that the company plans to undertake by its next COP to have the credibility of the information in its COP externally assessed, including goals, timelines, metrics, and responsible staff

**The COP incorporates the following high standards of transparency and disclosure:**

- ☐ Provides information on the company's profile and context of operation ⓘ
- ☐ Applies elements of the International Integrated Reporting Framework
- ☐ Is 'in accordance - comprehensive' with GRI Standards
- ☒ Is 'in accordance - core' with GRI Standards
- ☒ Applies the GRI Sustainability Reporting Guidelines or the GRI Standards

**Which of the following Sustainable Development Goals (SDGs) do the activities described in your COP address? [Select all that apply]**

- ☐ SDG 17: Strengthen the means of implementation and revitalize the global partnership for sustainable development
- ☒ SDG 16: Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels
- ☐ SDG 15: Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss
- ☐ SDG 14: Conserve and sustainably use the oceans, seas and marine resources for sustainable development
- ☒ SDG 13: Take urgent action to combat climate change and its impacts
- ☐ SDG 12: Ensure sustainable consumption and production patterns
- ☒ SDG 11: Make cities and human settlements inclusive, safe, resilient and sustainable
- ☐ SDG 10: Reduce inequality within and among countries
- ☒ SDG 9: Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation
- ☒ SDG 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all
- ☐ SDG 7: Ensure access to affordable, reliable, sustainable and modern energy for all
- ☐ SDG 6: Ensure availability and sustainable management of water and sanitation for all
- ☐ SDG 5: Achieve gender equality and empower all women and girls
- ☐ SDG 4: Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all
- ☐ SDG 3: Ensure healthy lives and promote well-being for all at all ages
- ☐ SDG 2: End hunger, achieve food security and improved nutrition and promote sustainable agriculture
- ☐ SDG 1: End poverty in all its forms everywhere

With respect to your company's actions to advance the Sustainable Development Goals (SDGs), the COP describes: [Select all that apply]

- ☐ Other established or emerging best practices ⓘ
- ☐ If the companies' activities related to the SDGs are undertaken in collaboration with other stakeholders ⓘ
- ☒ The (expected) outcomes and impact of your company's activities related to the SDGs ⓘ
- ☒ How one or more SDGs are integrated into the company's business model ⓘ
- ☒ Goals and indicators set by our company with respect to one or more SDGs ⓘ
- ☒ Where the company's priorities lie with respect to one or more SDGs ⓘ
- ☒ Opportunities and responsibilities that one or more SDGs represent to our business ⓘ

## Implementing the Ten Principles into Strategies & Operations

For the following criterion, please check the best practices you have implemented and discussed in your COP.

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### Criterion 1: The COP describes mainstreaming into corporate functions and business units

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff ⓘ
- ☒ Other established or emerging best practices ⓘ

Sustainability policy and sustainability strategy. See our website for full policy:  
<https://www.sparebank1.no/nb/bv/om-oss/barekraft/retningslinjer-og-rammeverk.html>  
SpareBank 1 BV also reports on Task Force on Climate-Related Disclosures (TCFD).
- ☒ Place responsibility for execution of sustainability strategy in relevant corporate functions (procurement, government affairs, human resources, legal, etc) ensuring that no function is conflicting with company sustainability commitments and objectives
- ☒ Align strategies, goals and incentive structures of all business units and subsidiaries with corporate sustainability strategy
- ☒ Assign responsibility for corporate sustainability implementation to an individual or group within each business unit and subsidiary
- ☒ Design corporate sustainability strategy to leverage synergies between and among issue areas and to deal adequately with trade-offs
- ☐ Ensure that different corporate functions coordinate closely to maximize performance and avoid unintended negative impacts

### Criterion 2: The COP describes value chain implementation

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff ⓘ
- ☒ Analyze each segment of the value chain carefully, both upstream and downstream, when mapping risks, opportunities and impacts
- ☒ Implement monitoring and assurance mechanisms (e.g. audits/screenings) for compliance within the company's sphere of influence
- ☒ Communicate policies and expectations to suppliers and other relevant business partners
- ☐ Other established or emerging best practices ⓘ
- ☐ Undertake awareness-raising, training and other types of capacity building with suppliers and other business partners

## Robust Human Rights Management Policies & Procedures

For the following criterion, please check the best practices you have implemented and discussed in your COP.

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### Criterion 3: The COP describes robust commitments, strategies or policies in the area of human rights

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff ⓘ
- ☒ Commitment to comply with all applicable laws and respect internationally recognized human rights, wherever the company operates (e.g., the Universal Declaration of Human Rights, Guiding Principles on Human Rights) (BRE1 + ARE1) ⓘ
- ☒ Integrated or stand-alone statement of policy expressing commitment to respect and support human rights approved at the most senior level of the company (BRE 1 + BRE5 + ARE 1 + ARE 5)
- ☒ Statement of policy stipulating human rights expectations of personnel, business partners and other parties directly linked to operations, products or services (BRE 1)
- ☒ Statement of policy publicly available and communicated internally and externally to all personnel, business partners and other relevant parties (BRE 1 + BRE 5 + ARE 1 + ARE 5)
- ☐ Other established or emerging best practices ⓘ

### Criterion 4: The COP describes effective management systems to integrate the human rights principles

- ☒ Process to ensure that internationally recognized human rights are respected
- ☒ Allocation of responsibilities and accountability for addressing human rights impacts
- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff ⓘ
- ☒ Processes to provide for or cooperate in the remediation of adverse human rights impacts that the company has caused or contributed to (BRE 3+ BRE 4 + ARE3 + ARE 4)
- ☒ On-going due diligence process that includes an assessment of actual and potential human rights impacts (BRE 2 + BRE 3 + ARE 2 + ARE 3) ⓘ
- ☒ Operational-level grievance mechanisms for those potentially impacted by the company's activities (BRE 4 + ARE 4)
- ☒ Process and programs in place to support human rights through: core business; strategic philanthropic/social investment; public policy engagement/advocacy; partnerships and/or other forms of collective action (BRE 6 + ARE 6)
- ☐ Other established or emerging best practices ⓘ
- ☐ Internal decision-making, budget and oversight for effective responses to human rights impacts
- ☐ Internal awareness-raising and training on human rights for management and employees

### Criterion 5: The COP describes effective monitoring and evaluation mechanisms of human rights integration

- ☒ Monitoring draws from internal and external feedback, including affected stakeholders
- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff ⓘ
- ☒ Process to deal with incidents the company has caused or contributed to for internal and external stakeholders (BRE 4 + ARE 4)
- ☒ Grievance mechanisms that are legitimate, accessible, predictable, equitable, transparent, rights-compatible, a source of continuous learning, and based on engagement and dialogue (BRE4 + ARE4)
- ☐ Other established or emerging best practices ⓘ
- ☐ Outcomes of integration of the human rights principles ⓘ
- ☐ Leadership review of monitoring and improvement results
- ☐ System to monitor the effectiveness of human rights policies and implementation with quantitative and qualitative metrics, including in the supply chain (BRE3 + ARE3) ⓘ

## Robust Labour Management Policies & Procedures

For the following criterion, please check the best practices you have implemented and discussed in your COP.

### Criterion 6: The COP describes robust commitments, strategies or policies in the area of labour

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff ⓘ
- ☒ Reference to principles of relevant international labour standards (ILO Conventions) and other normative international instruments in company policies ⓘ
- ☒ Reflection on the relevance of the labour principles for the company ⓘ
- ☒ Written company policy to obey national labour law, respect principles of relevant international labour standards in worldwide company operations and engage in dialogue with representative organization of the workers (international, sectoral, national).
- ☒ Inclusion of reference to the principles contained in the relevant international labour standards in contracts with suppliers and other relevant business partners
- ☒ Specific commitments and Human Resources policies, in line with national development priorities or decent work priorities in the country of operation ⓘ
- ☐ Other established or emerging best practices ⓘ
- ☐ Structural engagement with a global union, possibly via a Global Framework Agreement
- ☐ Participation and leadership by employers' organizations (international and national) to jointly address challenges related to labour standards in the countries of operation, possibly in a tripartite approach (business – trade union – government).

### Criterion 7: The COP describes effective management systems to integrate the labour principles

- ☒ Dialogue mechanism with trade unions to regularly discuss and review company progress in addressing labour standards
- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff ⓘ
- ☒ Allocation of responsibilities and accountability within the organization
- ☒ Active engagement with suppliers to address labour-related challenges
- ☒ Grievance mechanisms, communication channels and other procedures (e.g., whistleblower mechanisms) available for workers to report concerns, make suggestions or seek advice, designed and operated in line with the representative organization of workers
- ☐ Other established or emerging best practices ⓘ
- ☐ Internal awareness-raising and training on the labour principles for management and employees
- ☐ Risk and impact assessments in the area of labour

### Criterion 8: The COP describes effective monitoring and evaluation mechanisms of labour principles integration

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff ⓘ
- ☒ Dialogues with the representative organization of workers to regularly review progress made and jointly identify priorities for the future
- ☒ Audits or other steps to monitor and improve the working conditions of companies in the supply chain, in line with principles of international labour standards
- ☐ Other established or emerging best practices ⓘ
- ☐ Outcomes of integration of the Labour principles ⓘ
- ☐ Process to positively engage with the suppliers to address the challenges (i.e., partnership approach instead of corrective approach) through schemes to improve workplace practices
- ☐ System to track and measure performance based on standardized performance metrics

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## Robust Environmental Management Policies & Procedures

For the following criterion, please check the best practices you have implemented and discussed in your COP.

### Criterion 9: The COP describes robust commitments, strategies or policies in the area of environmental stewardship

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff ⓘ
- ☒ Reference to relevant international conventions and other international instruments (e.g. Rio Declaration on Environment and Development) ⓘ
- ☒ Reflection on the relevance of environmental stewardship for the company ⓘ
- ☒ Written company policy on environmental stewardship
- ☒ Inclusion of minimum environmental standards in contracts with suppliers and other relevant business partners
- ☒ Specific commitments and goals for specified years
- ☐ Other established or emerging best practices ⓘ

### Criterion 10: The COP describes effective management systems to integrate the environmental principles

- ☐ Assessments of lifecycle impact of products, ensuring environmentally sound management policies
- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff ⓘ
- ☒ Environmental risk and impact assessments
- ☒ Allocation of responsibilities and accountability within the organisation
- ☒ Internal awareness-raising and training on environmental stewardship for management and employees
- ☒ Grievance mechanisms, communication channels and other procedures (e.g. whistleblower mechanisms) for reporting concerns or seeking advice regarding environmental impacts
- ☐ Other established or emerging best practices ⓘ

### Criterion 11: The COP describes effective monitoring and evaluation mechanisms for environmental stewardship

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff ⓘ
- ☒ Process to deal with incidents
- ☒ Leadership review of monitoring and improvement results
- ☒ Audits or other steps to monitor and improve the environmental performance of companies in the supply chain
- ☒ Outcomes of integration of the environmental principles ⓘ
- ☐ Other established or emerging best practices ⓘ
- ☐ System to track and measure performance based on standardized performance metrics

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## Robust Anti-Corruption Management Policies & Procedures

For the following criterion, please check the best practices you have implemented and discussed in your COP.

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### Criterion 12: The COP describes robust commitments, strategies or policies in the area of anti-corruption

- ☒ Detailed policies for high-risk areas of corruption (D4)
- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff ⓘ
- ☒ Publicly stated formal policy of zero-tolerance of corruption (D1)
- ☒ Commitment to be in compliance with all relevant anti-corruption laws, including the implementation of procedures to know the law and monitor changes (B2)
- ☒ Policy on anti-corruption regarding business partners (D5)
- ☐ Other established or emerging best practices ⓘ
- ☐ Statement of support for international and regional legal frameworks, such as the UN Convention against Corruption (D2)

### Criterion 13: The COP describes effective management systems to integrate the anti-corruption principle

- ☒ Internal checks and balances to ensure consistency with the anti-corruption commitment (B6)
- ☒ Internal accounting and auditing procedures related to anticorruption (D10)
- ☐ Actions taken to encourage business partners to implement anti-corruption commitments (D6)
- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff ⓘ
- ☒ Carrying out risk assessment of potential areas of corruption (D3)
- ☒ Human Resources procedures supporting the anti-corruption commitment or policy, including communication to and training for all employees (B5 + D8)
- ☒ Management responsibility and accountability for implementation of the anti-corruption commitment or policy (D7)
- ☒ Communications (whistleblowing) channels and follow-up mechanisms for reporting concerns or seeking advice (D9)
- ☐ Other established or emerging best practices ⓘ
- ☐ Support by the organization's leadership for anti-corruption (B4)

### Criterion 14: The COP describes effective monitoring and evaluation mechanisms for the integration of anti-corruption

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff ⓘ
- ☒ Process to deal with incidents (D13)
- ☒ Public legal cases regarding corruption (D14)
- ☒ Outcomes of integration of the anti-corruption principle ⓘ
- ☐ Other established or emerging best practices ⓘ
- ☐ Use of independent external assurance of anti-corruption programmes (D15)
- ☐ Leadership review of monitoring and improvement results (D12)



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## Taking Action in Support of Broader UN Goals and Issues

For the following criterion, please check the best practices you have implemented and discussed in your COP.

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### Criterion 15: The COP describes core business contributions to UN goals and issues

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff ⓘ
- ☒ Align core business strategy with one or more relevant UN goals/issues
- ☒ Develop relevant products and services or design business models that contribute to UN goals/issues
- ☒ Adopt and modify operating procedures to maximize contribution to UN goals/issues
- ☐ Other established or emerging best practices ⓘ

### Criterion 16: The COP describes strategic social investments and philanthropy

- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff ⓘ
- ☒ Pursue social investments and philanthropic contributions that tie in with the core competencies or operating context of the company as an integrated part of its sustainability strategy
- ☒ Take responsibility for the intentional and unintentional effects of funding and have due regard for local customs, traditions, religions, and priorities of pertinent individuals and groups
- ☐ Other established or emerging best practices ⓘ
- ☐ Coordinate efforts with other organizations and initiatives to amplify—and not negate or unnecessarily duplicate—the efforts of other contributors

### Criterion 17: The COP describes advocacy and public policy engagement

- ☒ Publicly advocate the importance of action in relation to one or more UN goals/issues
- ☐ Other established or emerging best practices ⓘ
- ☐ Commit company leaders to participate in key summits, conferences, and other important public policy interactions in relation to one or more UN goals/issues
- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff ⓘ

### Criterion 18: The COP describes partnerships and collective action

- ☒ Develop and implement partnership projects with public or private organizations (UN entities, government, NGOs, or other groups) on core business, social investments and/or advocacy
- ☒ Join industry peers, UN entities and/or other stakeholders in initiatives contributing to solving common challenges and dilemmas at the global and/or local levels with an emphasis on initiatives extending the company's positive impact on its value chain
- ☐ Other established or emerging best practices ⓘ
- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff ⓘ



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## Corporate Sustainability Governance and Leadership

For the following criterion, please check the best practices you have implemented and discussed in your COP.

### Criterion 19: The COP describes CEO commitment and leadership

- ☒ CEO leads executive management team in development of corporate sustainability strategy, defining goals and overseeing implementation
- ☒ CEO publicly delivers explicit statements and demonstrates personal leadership on sustainability and commitment to the UN Global Compact
- ☐ Other established or emerging best practices ⓘ
- ☐ Make sustainability criteria and UN Global Compact principles part of goals and incentive schemes for CEO and executive management team
- ☐ CEO promotes initiatives to enhance sustainability of the company's sector and leads development of industry standards
- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff ⓘ

### Criterion 20: The COP describes Board adoption and oversight

- ☒ Board of Directors (or equivalent) assumes responsibility and oversight for long-term corporate sustainability strategy and performance
- ☒ Board (or committee), where permissible, approves formal reporting on corporate sustainability (Communication on Progress)
- ☐ Other established or emerging best practices ⓘ
- ☐ Board establishes, where permissible, a committee or assigns an individual board member with responsibility for corporate sustainability.
- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff ⓘ

### Criterion 21: The COP describes stakeholder engagement

- ☐ Consult stakeholders in dealing with implementation dilemmas and challenges and invite them to take active part in reviewing performance
- ☐ Any relevant policies, procedures, and activities that the company plans to undertake by its next COP to fulfill this criterion, including goals, timelines, metrics, and responsible staff ⓘ
- ☒ Publicly recognize responsibility for the company's impacts on internal and external stakeholders
- ☒ Define sustainability strategies, goals and policies in consultation with key stakeholders ⓘ
- ☒ Establish channels to engage with employees and other stakeholders to hear their ideas and address their concerns
- ☐ Other established or emerging best practices ⓘ