DNB

Sustainability Factbook 2021



Contents

Sustainability in DNB

About the sustainability Factbook	3
Financial ambitions	4
Sustainable strategy	4
Purpose and values	5
Our work with the UN Sustainable Development Goals.	6

DNBs Sustainability Factbook 2021 is produced by DNB Public Affairs & Sustainability

Design: Hyper

Material topics and key figures

ESG assessments in credit analyses and asset management	7
ightarrow Responsible lending to corporate customers	7
ightarrow Responsible investments	8
Reducing greenhouse gas emissions	10
Financing the climate transition through sustainable products	12
Biodiversity	14
Diversity and inclusion	16
Preventing financial crime and money laundering	18
Information security and stable IT systems	20
Data protection	21
Responsible customer advisory services and marketing	22
Innovative products and user-friendly services	23
Attractive workplace	24
Competence and employee development	25
Responsible purchasing	26

About the Sustainability Factbook

This factbook is a supplement to the 2021 annual report, and gives a brief overview of the most material topics with regard to DNB's influential power relating to sustainable development and ability to create long-term value. In 2021, we carried out a new materiality analysis, supplementing it with an impact analysis (see pages 30–33 in the annual report), and thus we were able to identify which topics are strategically important to DNB, in the context of the expectations our stakeholders have of us. The analyses help us identify areas where we have a major impact and can contribute to positive societal development. We have condensed the most important topics into these three main areas, which guide our sustainability efforts and formed the foundation for DNB's sustainable strategy:

DNB finances the climate transition and is a driving forco for sustainable value creation DNB is a driving force for diversity and inclusion DNB combats financial crime and contributes to a secure digital economy

We launched our updated sustainable strategy in June 2021, taking a clear position as a driving force for the sustainable transition (see page 26–29 in the annual report). We have set a target of reaching net-zero emissions from our financing and investment activities by 2050, and sub-targets for reducing the emissions intensity in the portfolio by 2030. We will give a status update for these goals in the factbook.

Together with the description of the topics in the sustainable strategy, the Sustainability Factbook constitutes DNB's sustainability reporting in accordance with the GRI Standards. The factbook has been verified by the bank's statutory auditor.

Material topics



DNB finances the climate transition and is a driving force for sustainable value creation

- → Financing the green transition and reducing greenhouse gas emissions
- → Sustainable products
- → Circular economy
- → Biodiversity
- → ESG assessments in credit analyses and asset management



DNB is a driving force for diversity and inclusion

- → Diversity and inclusion
- → Attractive workplace
- → Competence and employee development



DNB combats financial crime and contributes to a secure digital economy

- → Preventing financial crime and money laundering
- → Information security
- → Stable IT systems
- → Data protection



Creating the best customer experiences

- → Responsible customer advisory services and marketing
- → Responsible lending to personal customers
- → Innovative and user-friendly products and services

Financial ambitions	Ambitions	Achieved in 2021
Return on equity (ROE) (Overriding target)	> 12.0%	10.7 %
Cost/income ratio (Key performance indicator)	< 40.0%	43.0 %
Common equity Tier 1 capital ratio ¹⁾ (Capitalisation level)	> 17.6%	19.4 %
Payout ratio (Dividend policy)	> 50.0%	61.9 %

1) Expectations from the supervisory authorities as at 31 December 2021, including counter-cyclical buffer requirement at the same level as before the pandemic.

Sustainab	ility ambitions	Ambitions	Achieved as of 31 Dec. 2021
	DNB finances the clir a driving force for su	nate transition and is stainable value creation	
Finance and f activities by 2	acilitate sustainable 2030	NOK 1 500 billion	NOK 313 billion
Reduce the pointensity by 2	ortfolio's emissions 030	Oil and gas: 25% Shipping: 1/3 Commercial property: 25-35%	Se pages 68-73 in the annual report
	l assets in mutual funds with ty profile in 2025	NOK 100 billion	NOK 27 billion
	the emissions intensity of kring's portfolio by 2030	up to 55%	Se pages 72-73 in the annual report



DNB is a driving force for diversity and inclusion



DNB combats financial crime and contributes to a secure digital economy

5

Purpose and values

Our mission: We are here. So you can stay ahead.

Our values: We are curious, bold and responsible.

Sustainable strategy

DNB will be a driving force for sustainable transition, and we will use our position and expertise to actively help our customers to move in a more sustainable direction, through the provision of advisory services, financing and clear requirements. Our overriding target is net-zero emissions from our lending and investment portfolio, as well as from our own operations, by 2050. We will primarily use positive influence, but may also choose not to finance or invest in certain companies or industries that are not in line with our strategy. At the same time, we must also keep our own house in order and work actively with sustainability in DNB's own operations, both as an employer and as a purchaser.

The strategy focuses on three priority areas where we have the greatest opportunity to use our influence, and which reflect the Group's greatest risks and opportunities:

- \rightarrow DNB finances the climate transition and is a driving force for sustainable value creation
- \rightarrow DNB is a driving force for diversity and inclusion
- \rightarrow DNB combats financial crime and contributes to a secure digital economy

Our work with the UN Sustainable Development Goals

The UN Sustainable Development Agenda was adopted in 2015, as a global plan of action to end poverty, combat inequality and limit climate change by 2030. The Sustainable Development Agenda consists of 17 Sustainable Development Goals (SDGs), and each SDG has a number of targets focusing on the main areas that must be addressed effectively in order to achieve the overall goals. For us in DNB, the SDGs have been a source of inspiration for our own sustainability work, and a valuable framework for discussions with corporate customers about how they choose to integrate sustainability into their strategies.

DNB supports all 17 of the SDGs. At the same time, we have identified specific goals that are particularly relevant to our business operations, in line with the materiality analysis and DNB's sustainable strategy. We have identified three main SDGs that reflect the three priority areas of the strategy, and that are areas where we believe that we are particularly well placed to make a positive contribution:

- → SDG 5: Achieve gender equality and empower all women and girls.
- → SDG 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.
- → SDG 13: Take urgent action to combat climate change and its impacts.

Other SDGs we are focusing on, and which reflect our materiality analysis, are SDGs 7, 9, 10, 12, 14, 15 and 16. Through our roles as employer, investor, lender, and facilitator and supplier of financial infrastructure, we are seeking to contribute positively to fulfilling these SDGs, and reducing our negative impact in these areas.

UN Sustainable Development Goals

DNB's top priority SDGs



Other SDGs prioritised by DNB



Other SDGs



All 13 topics in this factbook are linked with one or more of the UN SDGs.

ESG assessments in credit analyses and asset management

Responsible lending to corporate customers

What does it mean/why is it important?

As a large lender, DNB has real influence on its customers. By requiring accountability, we can contribute positively to society while reducing our customers' risk, as well as our own. DNB's long-term profitability depends on our customers making choices to reduce risk and seize opportunities in sustainable restructuring. This is increasingly a matter of competitiveness – our customers' and our own.

Status 2021

- → For all customers with a total credit commitment of more than NOK 8 million, ESG risk must be commented on in the credit proposal.
- ightarrow ESG risk assessment tools must be used for all credit commitments above NOK 50 million.
- → DNB started using the updated ESG risk assessment tool for corporate customers in 2021. More than 1 500 credit customers were risk assessed using this tool during the year. We trained all credit analysts, account managers and relevant Corporate Banking managers, as well as credit officers.
- → In 2021, 18 projects were financed in accordance with the equator principles. 17 of them were renewable power generation projects, including DNB's first financing of a project for solar power battery storage.
- → Responsible Ship Recycling Standard: We achieved our ambition of 100 per cent of our loan agreements having responsible ship recycling clauses. The ambition was maintained and expanded to include new offshore loans, and the target has also been reached there.
- → Sustainability-related topics were an important part of the several thousand customer dialogues we conducted in 2021.

Responsible area in the bank Corporate Banking

Governing documents

Group standard for corporate responsibility in DNB's credit activities



Measurement parameter	2019	2020	2021	Target (if relevant)	Comment
GRI FS8 ESG: Products and services	46.2	51.0	60.7		Direct loans to renewable energy (solar, wind and hydropower) in NOK billion
Number of new equator projects	3	11	18		

ESG assessments in credit analyses and asset management

Responsible investments

What does it mean/why is it important?

Responsible and sustainable investment means taking environmental, social and governance (ESG) factors into consideration in investment management, and contributing to sustainable development. In DNB, we manage significant assets on behalf of our customers, through DNB Livsforsikring, the management of mutual funds and active portfolios in DNB Asset Management (DAM), as well as through the Group's equity investments.

The main purpose of this work is to achieve long-term returns with an acceptable level of risk, contribute to sustainable development and avoid contributing to the violation of fundamental rights. Customer expectations, regulatory conditions and the financial effect of material ESG factors are putting ever-increasing demands on fund managers when it comes to responsibility and sustainability.

For a full ESG report relating to responsible investment, see the 2021 Annual Report on Responsible Investment, published by DNB Asset Management.

Status 2021

- → 241 structured dialogues were conducted with 177 companies in 2021, to discuss various ESG topics with measurement of progress. Running dialogues were also conducted, and they were increasingly proactive.
- → As part of the active exercise of ownership rights, we voted at 155 general meetings in Norway and 169 internationally.
- → Work continued during 2021 on developing analytical tools and methods to survey climaterelated risks and opportunities at company and portfolio level. An important part of this work has been to collaborate with UNEP FI and other investors to identify best practice, and to further develop scenario analyses and other forward-looking methods.
- → In 2021, we decided, as part of the net-zero 2050 ambition, to set a target of increasing the total assets in mutual funds with a sustainability profile to NOK 100 billion by 2025. In addition, the goal is for half of net flows in 2025 to go to such mutual funds.
- → We launched several mutual funds with a sustainability profile in 2021, including an index fund with a benchmark index that seeks to be in line with the Paris Agreement. In addition, we relaunched a global equity fund that uses the UN Sustainable Development Goals as a framework for its investments.
- → DNB Livsforsikring increased its ambition to reduce the emissions intensity of its portfolio from 40 per cent to 55 per cent by 2030 (baseline is an average of the period 2017–2019).

Responsible area in the bank Wealth Management

Governing documents

Group standard for responsible investments

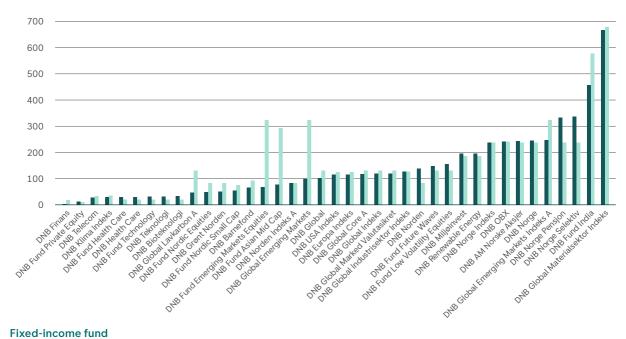


Measurement parameter	2019	2020	2021	Target (if relevant)	Comment
GRI 305-4: Greenhouse gas emissions/ GHG emissions					See Carbon footprint of mutual funds (Montreal Carbon Pledge) on dnb.no/sustainability- reports
GRI FS10: Dialogue	209	229	241		Number of meetings with companies where various ESG-related topics were discussed
GRI FS 11: Positive/negative screening	1.31%	2.48%	3.11%		Percentage of total assets subject to a combination of negative and positive environmental and/or social screening
GRI FS8: Financial ESG products	8.9	18.4	26.9		Total assets invested in mutual funds with a sustainability profile, in NOK billion
Share of total assets with negative environmental and/or social screening	100%	100%	100%		

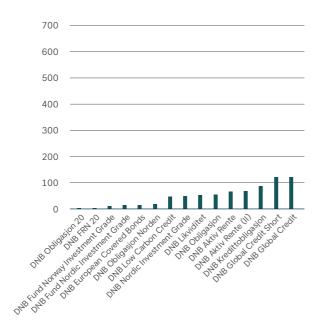
Greenhouse gas emissions of DNB's mutual funds relative to reference indices

Tonnes of CO_2 equivalents for every USD 1 million in revenue

Equity fund



Fixed-income fund



Certain Information ©2022 MSCI ESG Research LLC. Reproduced by permission

DNB mutual fund Reference indices

Although DNB Asset Management's information providers, including without limitation, MSCI ESG Research LLC and its affiliates (the "ESG Parties"), obtain information (the "Information") from sources they consider reliable, none of the ESG Parties warrants or guarantees the originality, accuracy and/or completeness, of any data herein and expressly disclaim all express or implied warranties, including those of merchantability and fitness for a particular purpose. The Information may only be used for your internal use, may not be reproduced or redisseminated in any form and may not be used as a basis for, or a component of, any financial instruments or products or indices. Further, none of the Information can in and of itself be used to determine which securities to buy or sell or when to buy or sell them. None of the ESG Parties shall have any liability for any errors or omissions in connection with any data herein, or any liability for any direct, indirect, special, punitive, consequential or any other damages (including lost profits) even if notified of the possibility of such damages.

Reducing greenhouse gas emissions

What does it mean/why is it important?

DNB has set a target of net-zero emissions from the financing and investment portfolio by 2050. To get there, we aim to reduce emissions intensity at both portfolio level and in significant sectors by 2030 (compared to 2019 levels). Oil and gas, shipping and real estate are the sectors where DNB can make the greatest impact, and with the best data availability and highest emissions intensity. The targets include customers' Scope 1 and Scope 2 emissions¹¹ where they can be measured and the data is available.

Oil and gas: DNB aims to reduce the CO₂ emissions intensity related to the upstream oil and gas portfolio by 25 per cent from 2019 to 2030.

Shipping: DNB aims to reduce the emissions intensity in the shipping portfolio by 1/3 from 2019 to 2030.

Commercial property: DNB aims to reduce the emissions intensity related to energy consumption in the commercial property portfolio by 25–35 per cent from 2019 to 2030. **Life insurance:** Our goal is to reduce the emissions intensity of the life insurance portfolio by 55 per cent before 2030, with the baseline set in 2019.

Status 2021

- → Oil and gas: The emissions intensity for lending is compared against the baseline year 2019. There was a reduction in emissions intensity of 11.1 per cent in 2020, and of 3.1 per cent in 2021. The reason for these fluctuations is explained in the annual report on page 70.
- → Shipping: The emissions intensity of lending to this sector increased by 2.9 per cent from 2019 to 2020. The reason is explained in the annual report on pages 71–72.
- → Commercial property: Due to a lack of source data, it has been impossible to set a baseline or a final reduction target for emissions intensity for this sector.
- → Life insurance: Our goal is to reduce the emissions intensity of the life insurance portfolio by 55 per cent by 2030, compared with the baseline in 2019. In 2020, the emissions intensity was reduced by 45 per cent. The reduction was unusually large, which was primarily due to a low share of investments in energy in the underlying mutual funds throughout the year. In 2021, the emissions intensity increased by 21.2 per cent, mainly due to an increase in the share of investments in energy in the underlying mutual funds once again. Volatility is expected in the time ahead, as indicated by these fluctuations from year to year. Compared with the baseline in 2019, the emissions intensity was 20.6 per cent lower in 2021. This indicates a positive development in terms of reaching the target of a 55 per cent reduction by 2030.

Responsible area in the bank

Corporate Banking, Wealth Management

Governing documents

Group standard for corporate responsibility in DNB's credit activities, Group standard for responsible investments



Measurement parameter	2019	2020	2021	Target (if relevant)	Comment
Oil and gas – emissions intensity	100%	88.9%	96.9%	75%	See page 70 of the annual report for further information.
Shipping – emissions intensity	100%	102.9%	n.a.	66.7%	See pages 70-72 of the annual report for further information.
Commercial property	n.a.	n.a.	n.a.	66-75%	Final baseline and targets for commercial property have not yet been set due to a lack of data. The target is therefore tentative.
DNB Livsforsikring – portfolio's emissions intensity	100%	55%	79.4%	45%	See pages 72–73 of the annual report for further information



Financing the climate transition through sustainable products

What does it mean/why is it important?

As Norway's largest financial services group, DNB has considerable influence on the sustainable transition in Norway and internationally. We integrate sustainability and corporate responsibility into our lending activities because it is through these activities that DNB has the greatest impact on society, climate issues and the environment. This is also good risk management. Our long-term profitability depends on our customers integrating sustainability into their strategic choices. We see that our customers both want to, and have to, invest in sustainability in order to streamline their operations, save costs, meet their stakeholders' expectations, gain access to capital and exploit new business opportunities – in short, to be competitive. This represents opportunities for profitable and sustainable growth for DNB. By requiring our customers to be responsible, we can both contribute to societal development and reduce our customers' risk, as well as our own.

In 2021, we wanted to be even more ambitious and launched an updated sustainable strategy for the Group. One of the strategic priorities is for DNB to finance the climate transition and be a driving force for sustainable value creation. Our goal is to finance and facilitate sustainable activities worth NOK 1 500 billion by 2030. The previous funding targets (NOK 450 billion to the financing of renewable energy and infrastructure and NOK 130 billion to the financing of green property development) are included in the new target of NOK 1 500 billion. To achieve this goal, we must be able to offer our customers good, sustainable products. This has been a main priority in 2021, and we have implemented several measures across various business areas.

Status 2021

- → In 2021, DNB contributed NOK 217 billion to the financing and facilitating of sustainable activities. This is a 126 per cent increase from 2020, when the volume was NOK 96 billion.
- → Altogether, since 2019, we have contributed NOK 313 billion to the financing and facilitation of sustainable activities.
- → DNB Finans contributed NOK 14.5 billion in financing of electric vehicles through loans and leasing in the four Nordic countries.
- → DNB Markets helped facilitate 47 sustainable bonds with a total volume of NOK 83 billion. This represents an increase of almost 130 per cent from 2020.
- → DNB launched an updated framework for sustainable products in 2021. The framework and associated criteria show the activities eligible for green financing from DNB. To a large extent, the update takes the EU taxonomy into account.
- → We updated the process for sustainability-linked loans, a product where the loan's terms and conditions are linked to customers' work on one or more agreed sustainability indicators.
- → We introduced sustainable pension savings with the new Next Generation pension profile, which allows customers to steer their savings towards fossil-free and thematic climate and environmental investments.
- → We continued to offer particularly good loan terms to private customers who order solar panels through Fjordkraft. We also expanded our cooperation agreements with Ishavskraft and Bodø Energi.
- → We completed the first report on the climate-related alignment of DNB's shipping portfolio in accordance with the Poseidon Principles. Our portfolio is close to the average among reporting banks, and 2.5 per cent above the ideal curve that supports the climate targets of the International Maritime Organization.

Responsible area in the bank

Corporate Banking

Governing documents

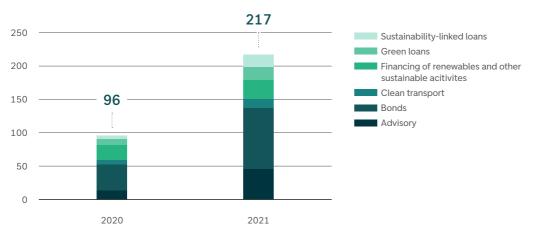
Group standard for corporate responsibility in DNB's credit activities



Measurement parameter	2019	2020	2021	Target (if relevant)	Comment
GRI FS8 ESG: Products and services	46.2	51.0	60.7		Direct loans to renewable energy (solar, wind and hydropower) in NOK billion
Number of new equator projects	3	11	18		
Green bonds - market share Norway	27%	35%	14%		
Green bonds - total transaction amount	NOK 40 billion	NOK 39 billion	NOK 83 billion		Increase of almost 130% from 2020 to 2021.

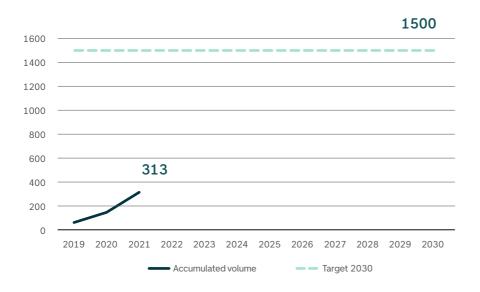
Target attainment in 2021: Sustainable financing by product

NOK billion



Target attainment in 2021: Financing target for sustainable activities

NOK billion



Biodiversity

What does it mean/why is it important?

Climate change and loss of biodiversity are closely interconnected. Nature absorbs large amounts of greenhouse gases and mitigates the harmful effects of climate change¹). Promoting biodiversity is therefore an important part of the solution to the climate challenges we face, and key to achieving the UN Sustainable Development Goals. According to the World Economic Forum, loss of biodiversity is one of the gravest risks to the world economy in the next ten years. The EU has estimated that half of the total global GDP is at risk due to the business sector's dependence on nature and its services.

Based on this, biodiversity was defined as a thematic focus area for DNB Asset Management in 2020. We have been working on related topics such as the oceans, deforestation and land use for a long time. This work has focused, among other things, on palm oil, meat production, soy, UNESCO World Heritage Sites and sustainable oceans. In 2022, biodiversity will become a focus area for lending activities and the entire DNB Group.

Status 2021

- → In 2021, DNB Asset Management signed the Finance for Biodiversity Pledge, a call for the protection of biodiversity. The initiative is supported by 84 stakeholders with more than EUR 12.6 trillion in total assets.
- → DNB Asset Management launched an expectation document for biodiversity. The document describes our expectations of companies with regard to biodiversity, including deforestation.
- → Based on the expectation document, we conducted 23 dialogues focusing on biodiversity and deforestation in 2021. We conducted the dialogues both individually and in various investor collaborations and initiatives, including the FAIRR Initiative.²⁾

Responsible area in the bank

Wealth Management

Governing documents

Group standard for responsible investments Criteria and expectations Biodiversity Criteria and expectations Sustainable oceans

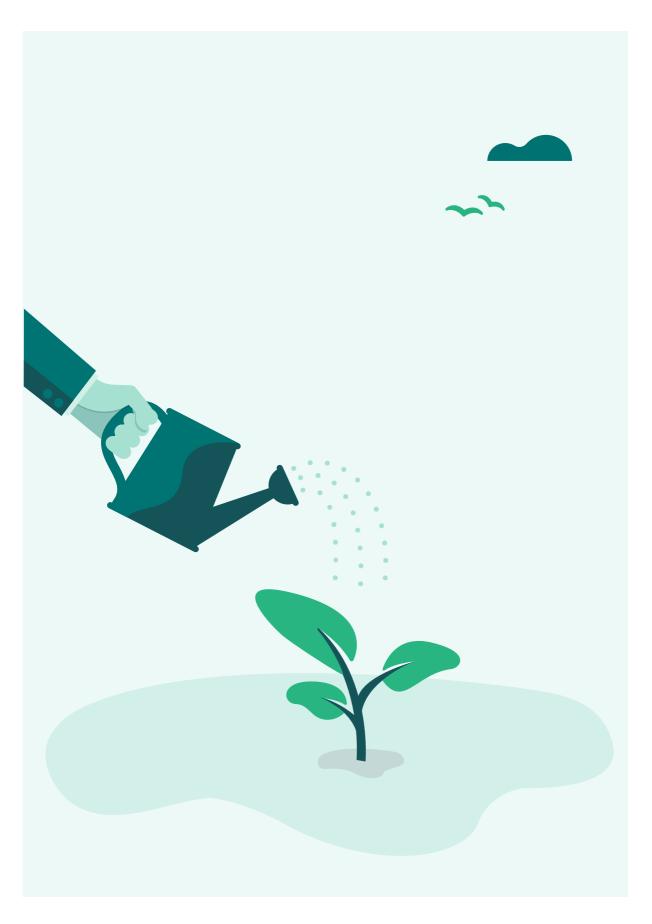
Link to the UN Sustainable Development Goals



Measurement parameter	2019	2020	2021	Target (if relevant) Comment
Number of commitments/dialogues	n.a.	n.a.	23	
focusing on biodiversity and				
deforestation				

1) Link to PBES' Report on Biodiversity and Climate Change:

https://ipbes.net/events/launch-ipbes-ipcc-co-sponsored-workshop-report-biodiversity-and-climate-change
The FAIRR Initiative is a global network of investors working together on issues related to intensive animal production, and in general on opportunities and risks associated with food systems. FAIRR is a non-governmental voluntary organisation that helps investors exert their influence as responsible asset managers, while safeguarding the long-term value of investment portfolios.



Diversity and inclusion

What does it mean/why is it important?

For us, diversity means everything that makes people and groups unique and different from each other, whether visible traits such as age, gender, functional ability and ethnicity, or invisible traits such as sexual orientation, religious beliefs, competence, life experiences, personality and interests. In DNB, inclusion covers initiatives and practices aimed at giving everyone the same opportunities to contribute to the organisation and to be themselves regardless of their background. Having a diverse and inclusive working environment pays off, and is in keeping with our ethical foundation.

The fact that our employees are diverse makes DNB a better company. If we are to achieve our goals of long-term value creation, high levels of customer satisfaction and being an attractive employer, we need to reflect the society we are part of. Having employees with varied perspectives and backgrounds helps us create value for our customers. This will give us a strong competitive advantage going forward.

For us in DNB, our efforts to promote equality and diversity extend beyond our own employees. We want to contribute to increased equality among our customers, through our products and services, as well as in the operations of our suppliers.

Status 2021

- \rightarrow In 2021, Group Management adopted an updated diversity action plan.
- → In March 2021, DNB was ranked the best company in the world in terms of equality, in a global survey conducted by Equileap which assesses nearly 4 000 companies.
- → DNB was ranked as the seventh best company in Europe in terms of diversity. The ranking was conducted on behalf of the Financial Times, and assessed 850 companies from 24 different industries in 16 European countries. We were ranked as number one in the Banking and Financial Services category.
- → The gender balance target (40/60) at all management levels stands, and in 2021 we reached the target for two out of five management levels (see illustration).
- → We continued our commitment to financial equality through the #huninvesterer ('#girlsinvest') campaign. In 2021, we highlighted the financial gender gap.
- → The inclusion index in the 2021 employee survey produced consistently good results, and showed that most employees view the working environment as inclusive. Perceived inclusion is scored on a scale of 1-6, and the goal is to have a score of at least 5 for the Group as a whole. In 2021, the score was 5.3.

Measurement parameter	2019	2020	2021	Target (if relevant)	Comment
GRI 405-2: Ratio of basic salary and remuneration of women to men	82.1	83.9	85.0	100%	Women's salary as a share of men's (average fixed salary)
Share of women at management levels 1–4	38.0	39.5	39.8	40%	In 2019, measurement parameters were changed to gender balance in management positions
Perceived inclusion among employees	5.1	5.2	5.3	>5	Perceived inclusion is measured on a scale of 1-6 through the Group's employee survey.

Responsible area in the bank People

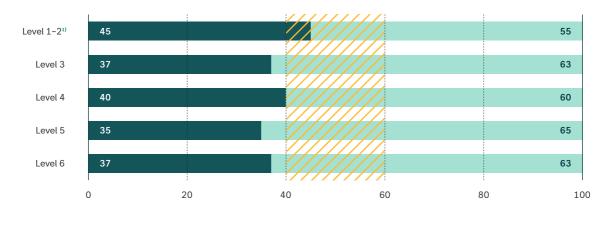
Governing documents

Corporate governance in DNB, DNB's Code of Conduct



Gender balance at management levels

Per cent



Women Men //// Goal

1) Group Management



Preventing financial crime and money laundering

What does it mean/why is it important?

In DNB, we give high priority to efforts to prevent and uncover financial crime, money laundering and terrorist financing. Crime of this kind is a serious problem for society and a threat to the welfare system and the business community. An overarching goal of our work in this area is to reduce financial losses for society, customers and DNB, and to maintain people's trust in our products and services. This work is an important part of our corporate responsibility.

Profit-motivated crime affects DNB and its customers directly, and we spend considerable resources on preventing fraud, for example. In addition, criminals may misuse our services and products to launder the proceeds from criminal acts or to finance terrorism. Money laundering can be linked to many types of crime, including human trafficking, assault or abuse, and drug trafficking offences. We work continuously to prevent and detect money laundering and to ensure a high level of compliance with money laundering rules and legislation.

Status 2021

- → DNB prevented fraud against customers and the Group worth NOK 734 million in 2021 (NOK 1180 million in 2020).
- → We registered a 68.8 per cent increase in customers exposed to fraud in digital channels compared to 2021.
- → The share of averted fraud attempts was 79.6 per cent in 2021. This is down from 82.6 per cent in 2020, but there has also been a significant increase in the number of fraud attempts.
- → We investigated 6 110 cases, and over the course of the year reported 1 689 cases to EFE (the Norwegian Financial Intelligence unit) in Økokrim (the Norwegian National Authority for Investigation and Prosecution of Economic and Environmental Crime) due to suspicion of money laundering or terrorist financing.
- → In 2021, we also saw fraud relating to government-guaranteed loans that were part of the Government's support package. Several cases were reported to the police, and we worked closely with Økokrim.
- → In November 2019, Økokrim launched an investigation of DNB following allegations of possible corruption and money laundering in Namibia linked to the Icelandic fisheries company Samherji, which was a customer in DNB. In February 2021, the investigation was closed, and the prosecuting authority dropped the case.
- → In May 2021, Finanstilsynet (the Financial Supervisory Authority of Norway) imposed an administrative fine of NOK 400 million on DNB, due to weaknesses in compliance with the antimoney laundering rules and legislation (more on this in the annual report on pages 109–110).
- → In the autumn of 2021, a new programme was started to ensure progress in the anti-money laundering work, and a central, governing professional environment was established in addition to the considerable number of employees already working with anti-money laundering.

Measurement				Target		
parameter	2019	2020	2021	(if relevant)	Comment	
GRI 205-2: Anti- corruption training	n.a.	98.8	98.3		The figure for 2020 reported in the factbook for 2020 does not correspond with the figure reported here. The reason for this is that the figure is calculated only on the basis of permanent employees.	
DNB 3: Anti-money laundering and anti- terrorist financing training	n.a.	n.a.	98.2		The course has been mandatory for all employees, but was only introduced as an indicator in 2021.	

Responsible area in the bank

Each unit is responsible for ensuring compliance with AML rules and legislation, as well as other rules and legislation concerning financial crime, in its own operations. Group AML is responsible for standardising procedures and for following up the implementation of procedures in the areas of AML and sanctions. Group Compliance is responsible for advising, controlling and reporting on compliance with rules and legislation.

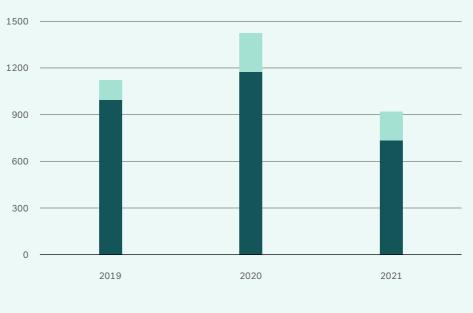
Governing documents

Corporate Governance in DNB, DNB's Code of Conduct, Group policy for compliance, Group standard for anti-corruption (ABC), Group standard for AML/ CFT, Group standard for international sanctions, routine for anonymous internal whistleblowing channel



Fraud attempts

In NOK million







Information security and stable IT systems

What does it mean/why is it important?

DNB is an important player in Norwegian society, which means that we must provide our customers and society with secure, stable and user-friendly solutions. Due to rapid technological and threat landscape developments, it is increasingly important to work systematically and purposefully to prevent cyberattacks and other security incidents. Good security work is key to retaining the trust of our customers and society in general, and to maintaining our long-term competitiveness and innovation power.

Stable and secure operations are one of our main focus areas, and well-functioning IT services are essential for having satisfied customers. Systematic efforts over several years have produced good results in terms of operational stability, and have reduced downtime considerably.

Status 2021

- → In 2021, we had 13 days with serious IT operational incidents. This is a decrease from 17 days in 2020 and 27 days in 2019.
- → Cyberattacks against DNB are becoming more advanced and complex. In 2021, DNB registered 14 470 attacks, compared with 16 967 the year before. None of the incidents had serious consequences for customers or the Group, but they illustrate the importance of security work.
- → In 2021, we drew on important lessons from the previous year to develop a new and more flexible working model. In 2020, we made necessary adjustments to our IT systems for home office use during the pandemic, and at the same time adopted new ways of working, while in 2021 we focused on people and processes.
- → We continued to operationalise the new organisation throughout 2021, and we are now seeing clear effects, including a clearer division of responsibilities, more standardised and efficient work processes and more user-friendly solutions.
- → By the end of December, 96 per cent of all employees had completed the basic training, and 82 per cent had taken the mandatory courses for 2021.

Responsible area in the bank

Technology & Services

Governing documents

DNB's Code of Conduct, DNB's privacy statement, DNB's ethical guidelines for business partners, Group policy for security

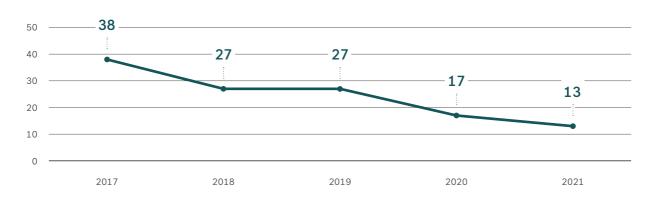
Link to the UN Sustainable Development Goals



Measurement parameter	2019	2020	2021	Target (if relevant) Comment
Days with incidents resulting in services being	27	17	13	
unavailable or having long response times				

Days with incidents resulting in services being unavailable or having long response times

Number of days



Data protection

What does it mean/why is it important?

Creating the best customer experiences is an overarching goal for DNB. Our customers expect good technical solutions that simplify the use of financial services. The increasing use of digital financial services requires access to information. Customers expect us to process their personal data in a responsible manner, and trust us to follow the data protection rules and legislation and not misuse their data. Should deviations occur, they must be dealt with quickly and efficiently. In order for us to have satisfied customers, we need to have their trust. This trust must be well managed and maintained. This means that we must be transparent about how we process personal data, and that data protection must be incorporated into all processes and solutions in DNB.

Status 2021

- → In 2021, we improved several processes and drew up new Group instructions. At the same time, we updated the governing documents for data and data protection.
- → In line with the Group's governance model, a decision was made in 2021 to organise the tasks and responsibilities relating to data protection in a new way. It was also decided to centralise the responsibility for selected Group-wide processes and tools.
- → A new and updated deviation management process was implemented in 2021. We still have a low threshold for reporting personal data security breaches, and in 2021 we sent 76 deviation reports to the Norwegian Data Protection Authority. DNB was not issued any orders or non-compliance fees by the Norwegian Data Protection Authority in 2021.
- → We completed a series of Data Protection Impact Assessment (DPIA) in 2021, to prevent undesirable processing consequences for customers.
- → We continued our work to build one of Norway's leading specialist environments in the area of data protection, and introduced several new positions, both in the business areas and centrally, as well as in connection with the Data Protection Officer function.
- → DNB's privacy protection statement and other information to customers regarding the processing of personal data will be updated, further developed and improved on a regular basis as was also the case in 2020.
- → In 2021, DNB received 1079 requests for access. We also received 306 requests for the transfer of data in a machine-readable format (data portability) and 401 requests for the deletion of personal data.
- \rightarrow 97 per cent of permanent employees have completed basic privacy training.

Measurement parameter	2019	2020	2021	Target (if relevant) Comment
Incurred fines or orders from the Norwegian Data Protection Authority due to GDPR violations	0	0	0	



Responsible area in the bank

Within the DNB Group, subsidiaries of DNB Bank ASA that process personal data for their own purposes are considered data controllers. Group Compliance and DNB's Data Protection Officer are responsible for advising, controlling and reporting on compliance with the data protection rules and legislation.

Governing documents

Corporate governance in DNB, DNB's Code of Conduct, Group policy for Compliance, Group standard for compliance, Group standard for personal data protection, DNB's Global framework for personal data protection, DNB's framework for the DPO function and Group instructions for the processing of personal data about employees.



Responsible customer advisory services and marketing

What does it mean/why is it important?

Our customers' needs must always be the starting point for the products and services we provide, and our customers should feel confident that we have their best interests at heart. Our ethical principles describe what is required of us in both a professional and private context if we are to live up to this standard, and our governance principles for corporate responsibility guide all our product development. This means safeguarding our customers' interests in connection with sales and advisory situations through open, clear and truthful communication, and taking good care of our customers' personal data and keeping it safe.

Status 2021

- \rightarrow In 2021, customer satisfaction was measured at 73.3. This was a decline from 73.6 in 2020.
- → The Norwegian Financial Services Complaints Board (FinKN) dealt with 224 cases related to banking in 2021, 47 of which involved DNB. They ruled in favour of DNB in 37 cases, 5 went in the customer's favour and 5 were rejected.
- → In 2021, efforts to risk-assess all third parties with whom we have an agreement were systemised. Random checks and evaluations are carried out each quarter to ensure that our processes and routines are under control, and violations or deviations are reported and logged.
- → We launched the campaign Ditt økonomiske DNA (your financial DNA), including a new mapping and advisory tool.

Responsible area in the bank

Personal Banking

Governing documents

Corporate governance in DNB, Group policy for financial management, Group policy for compliance



Measurement parameter	2019	2020	2021	Target (if relevant)	Comment
Customer satisfaction score	72.8	73.6	73.3		
Cases processed by the Norwegian Financial Services Complaints Board (GRI 417-2)	18	12	47		
Comments or fines from supervisory authorities related to marketing (GRI 417-3)	0	0	3		We received three comments, but no fines from the supervisory authorities relating to marketing.



Innovative products and user-friendly services

What does it mean/why is it important?

The financial services market is constantly changing, and we expect to see a fast pace of development in the financial industry in the time ahead. The COVID-19 pandemic has further accelerated the digital shift, and customers want and expect seamless services. Self-service solutions have become increasingly common, and the digital journey will require more of banks in the time ahead than it has until now.

To succeed in this market and create the best customer experiences, we must constantly improve and renew ourselves. In a Group like DNB, there is a great need to both improve existing solutions and create new ones. In recent years, it has become increasingly important to collect, analyse, use, and – not least – store data safely and securely. The insights we are able to extract from data are used to create better and more relevant customer experiences.

New technology and new business models do not only involve challenges, they also provide opportunities for increased value creation and better customer experiences.

Status 2021

- → The new dnb.no website is the digital flagship that meets visitors and customers. Here, customers will find the full breadth of DNB's services and products. For example, we have introduced new calculators for home mortgages, car loans, foreign exchange and financing, as well as separate pages with content tailored to different customer segments.
- → The internet bank has more than 1.5 million users. In the autumn of 2021, we launched the first beta version of a brand new, cloud-based internet bank for both personal customers and businesses.
- → At the start of 2021, the mobile banking app for private customers surpassed 1 million active users, and it has an AppStore rating of 4.7 out of 5.
- → In 2021, the corporate banking app DNB Puls went from being an app for the smallest companies to becoming a mobile banking app for all Norwegian corporate customers. The growth was 35.8 per cent for the year, and by the end of 2021, more than 38 000 companies had downloaded the app, which helps them gain better control over and overview of their own finances.
- \rightarrow We hosted DNB NXT Accelerator for the fifth time, in partnership with StartupLab.
- \rightarrow Our new equity trading solution was launched for 450 000 customers.
- → Greatly helped by shutdowns, travel restrictions, good times on the stock exchange and the #huninvesterer (#girlsinvest) campaign, customers had invested NOK 27 billion in mutual funds at the end of 2021, which is an increase of 87 per cent from the previous year.

Measurement parameter201920202021Target (if relevant)CommentRepTrak score on innovation in DNB, Q4788075RepTrak score relating to products and services, Q47678.473

Responsible area in the bank

Payments & Innovation

Governing documents

Corporate governance in DNB



Attractive workplace

What does it mean/why is it important?

DNB wants to be an attractive employer, able to attract and retain the best people. Our employees are the heart of the organisation, and our most important resource and competitive advantage. We believe in continuous learning, a constructive feedback culture and a diverse and inclusive organisation. Over the past year, the organisation has demonstrated a strong ability to change and adapt to the new framework conditions brought about by the pandemic. We will build on these strengths and experiences in the time ahead.



Status 2021

- → The coronavirus pandemic has naturally affected everyday life. Good job transition management enabled DNB to transfer employees from units with less activity to units with more pressing tasks, e.g., those in direct contact with customers. This has been done in close cooperation with the employees and trade unions.
- → Throughout the year, we implemented infection control measures in the workplace, in line with applicable infection control rules. When working from home has been mandatory, our employees have done so as far as possible.
- → We introduced a scheme for the purchase of necessary home office equipment, offered several online exercise classes and provided support in the form of counselling. We gave employees access to, and training in the use of, the remote collaboration tool Teams.
- → A survey showed that employees felt proud to be working in DNB, with a score of 86 points in 2021, the same as in 2020.
- → Absence due to illness was 3.4 per cent for DNB in Norway in 2021, the same as in 2020. For DNB's international offices, absence due to illness was 1.2 per cent in 2020, compared with 2.2 per cent the previous year.

Measurement parameter	2019	2020	2021	Target (if relevant)	Comment
Percentage of employees proud to work in DNB	82	86	86		Calculated average on a scale of 0–100 where 100 means 'totally agree' with the statement "I am proud to work in DNB".
GRI 401-1: New employee	794	660	729		*Turnover is calculated on the basis of all permanent
hires and employee	8.1%	6.8%	7.4%		employees who have left DNB, for whatever reason (incl.
turnover					severance packages etc.)

Responsible area in the bank People

Governing documents

Group standard for health, safety and environment (HSE)



Competence and employee development

What does it mean/why is it important?

It is important for DNB to be able to attract, retain and develop the skills the bank will need in the future. Restructuring and skills enhancement is a matter of building a diverse and competent workforce. Technology, regulations and customer behaviour are driving forces for the changes that we see around us, and that require the bank to adapt. This means that we need a different skills mix than before. In DNB, we see great value in developing our employees so that they can enable us to meet the opportunities and needs of tomorrow. We believe that everyone needs skills enhancement, and we therefore invest a great deal in training and development opportunities for our employees. While developing our own employees, we also want to position ourselves as an attractive employer vis-à-vis those outside the Group who hold the core competence that DNB needs to obtain in the future.

Status 2021

- → We were rated as the most attractive employer among business students in the Universum survey for the sixth year running. Among IT students we were ranked fourth, and among law students, twelfth.
- → The pandemic has increased the need for expertise in areas such as digital remote collaboration tools, self-management and leadership from a distance.
- $\rightarrow~$ We continued our efforts to develop our own training programmes.
- → All DNB employees have access to our digital learning platform Motimate, and over 98 per cent are active users.

Responsible area in the bank People

Governing documents

DNB's Code of Conduct, Group standard for health, safety and environment, Group standard for leadership and competence development



Measurement parameter	2019	2020	2021	Target (if relevant)	Comment
Number of employees who have completed Motimate courses	9 282	9 141	9 778		
GRI 404-2: Upgrading employee skills	n.a.	n.a.	n.a.		Includes several indicators. Seepages 92–95, in Strategic report.

Responsible purchasing

What does it mean/why is it important?

In 2021, DNB purchased goods and services for approximately NOK 9.2 billion. Of 4 520 suppliers, 122 accounted for around 80 per cent of purchasing costs. This is a complex universe, and we are working systematically to reduce sustainability risks relating to procurement. We also want to contribute to raising our suppliers' level of awareness in this area and help them make improvements, by updating DNB's ethical guidelines for business partners. The updated guidelines were applied in 2021. We also launched a new third-party risk management (TPRM) tool in 2021, which we use to assess the risks associated with suppliers, including sustainability risk. In addition, we are still using EcoVadis and on-site audits for prioritising and following up our main suppliers.

DNB has a notification channel for suppliers, through which violations of DNB's ethical guidelines for business partners can be reported. Violations of this kind are handled by DNB's Group Chief Audit Executive, who is responsible for notifications and whistleblowing, and they are treated as strictly confidential.

Status 2021

- → 1453 supplier reviews were performed in 2021, of existing as well as new suppliers. 9 per cent of these suppliers were considered to have a higher inherent risk and had to undergo a more thorough assessment before a final decision was made.
- → 61 per cent of important suppliers (with a large share of purchases and of great significance to DNB's operations) have undergone the EcoVadis analysis, an increase of 4 percentage points from 2020. The average score was 62/100.
- → Sustainability continued to be an important topic in meetings with, and the follow-up of, our suppliers.
- → DNB's ethical guidelines for business partners (previously known as DNB's Code of Responsible Business Conduct for Suppliers) were revised and updated

Responsible area in the bank Group Finance

Governing documents

DNB's ethical guidelines for business partners, DNB's procurement principles, DNB's anticorruption guide



Measurement parameter	2019	2020	2021 Target (if relevant) Comment
Number of audits of important suppliers	2	3	3
(based on risk and share of procurements)			



We are here. So you can stay ahead.

DNB

Mailing address: P.O.Box 1600 Sentrum N-0021 Oslo

Visiting address: Dronning Eufemias gate 30 Bjørvika, Oslo

dnb.no