
Sustainability Policy

Savings Banks Amalgamation

Approved by the Board of Directors of
the Savings Banks' Union on 26
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Document update history

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Sustainability, financial, economic, HR and compliance experts at the Savings Banks Centre	3 November 2025	Approved by the Board of Directors of the central institution of the Amalgamation on 26 November 2025

Contents

Document update history	2
1. Background	4
2. Purpose	4
3. Approval and application	4
4. Sustainability principles of the Savings Banks Group	5
5. Sustainable investment, financing and advisory services	6
5.1. Investment	6
5.2. Financing activities	6
5.3. Advisory services	7
6. Responsible lending practices	7
7. Responsible investment practices	7
8. Reporting	8

1. Background

Sustainability is at the core of our values based on the savings bank ideology and part of our 200-year history and strategy. Our purpose is to responsibly promote the financial wellbeing and prosperity of Finns and to use our expertise to enable a better life for our customers. Sustainability is a competitive factor that affects our reputation and business success. It is also an investment in our future operating capacity. Our goal is to meet our stakeholders' expectations regarding sustainability, continue to develop dialogue with our stakeholders and integrate sustainability into our business operations.

The Savings Banks Group recognises the importance of participating in and supporting international commitments that allow companies to operate more sustainably. We are a member of the following: UN Global Compact, PRI (Principles for Responsible Investment), Climate Action 100+, CDP's climate change, water and deforestation initiatives, Finland's Sustainable Investment Forum Finsif, and international savings bank organisations WSBI (World Savings and Retail Banking Institute) and ESGG (European Savings and Retail Banking Group). In addition, our human resource management principles take into account the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights defined in the eight fundamental conventions identified in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and in the International Bill of Human Rights.

2. Purpose

The purpose of the sustainability policy is to serve as a guideline for the sustainability of the Savings Banks Group. It defines the scope and basic principles of the Savings Banks Group's sustainability efforts. More detailed rules are described or will be described as necessary in internal guidelines, such as various policy-level guidelines and other operating instructions that are relevant to each business area. This policy is published on the Savings Banks Group's website in Finnish, Swedish and English.

3. Approval and application

The sustainability policy applies to the Savings Banks Group and covers its operations and employees as well as all activities related to customers, suppliers and other business partners.

The sustainability policy is a set of policy-level guidelines and is confirmed by the Board of Directors of the central institution. The guidelines are approved for implementation by the boards of each bank and company. The sustainability policy is reviewed annually or as necessary.

In terms of the entities belonging to the Amalgamation, these guidelines are the instructions of the central institution referred to in Section 17 of the Act on the Amalgamation of Deposit Banks and part of the guideline framework of the Savings Banks' Amalgamation, which is described in the document "Ohjeistokehikon yleiset periaatteet". For other entities belonging to the Savings Banks Group, these guidelines serve as a recommendation, and the entities themselves decide on the application of the guidelines in their own operations.

It is the responsibility of the management to ensure that employees are aware of the sustainability policy where necessary and that operations in their respective area of responsibility are in line with the policy.

4. Sustainability principles of the Savings Banks Group

The Savings Banks Group's sustainability strategy and sustainability roadmap provide guidelines for our sustainability efforts. The five main themes of the sustainability programme are: Financial wellbeing of customers and local communities, Safe and secure service experience, Wellbeing and equality in the work community, Environment and climate, and Good governance. The programme also sets out the UN Sustainable Development Goals that are supported by the Savings Banks Group's sustainability efforts.

In addition, the sustainability principles below guide conduct in daily work and when making business decisions. We strive to take these principles and other relevant principles related to the environment, social factors and good governance into account when assessing business risks and opportunities. The principles below are based on the Savings Banks Group's ethical guidelines (Code of Conduct, policies concerning conflicts of interest, and prevention of money laundering and terrorist financing) and human resource management principles, which also cover respect for human rights and fundamental rights at work, and DEI principles (diversity, equity, inclusion) guide our daily work.

- We are committed to good corporate governance, and we operate transparently and in accordance with ethical principles.
- We are committed to assessing and managing risks. We do not tolerate corruption, bribery, money laundering or terrorist financing.
- We are committed to social responsibility through our human resource management principles and promote positive impacts such as equality (diversity, equity, inclusion), growth, wellbeing and financial skills in the professional and local communities to which we belong. We also promote responsibility in our partnerships.
- We are committed to assessing negative and positive impacts on the environment and climate. We have set climate targets in our sustainability strategy and are taking measures to reduce negative environmental impacts. In line with our climate change transition plan, we are reducing our emissions in financing and investing together with our customers and partners, as well as in our own operations, for example in terms of energy consumption and vehicles. We promote positive impacts on the environment and climate by developing sustainable investment and financing options as well as responsible products and services. We finance and invest responsibly in accordance with our principles for responsible investment, credit guidelines and product management principles.
- We are committed to promoting safe and secure customer transactions and preventing financial crime.

5. Sustainable investment, financing and advisory services

At the Savings Banks Group, we promote the integration of economic, social and environmental responsibility into all our operations. These principles are part of our daily work and are taken into account in decisions concerning business operations. The Savings Banks Group takes into account principles related to the environment, social factors and good governance (so-called ESG principles) when assessing business risks and opportunities related to investments, financing and advisory services. ESG factors and risks are considered and assessed as part of investment and financing decision-making and analysis.

5.1. Investment

- We are committed to incorporating environmental, social and governance issues into our investment process. ESG factors and risks are considered and assessed as part of investment decision-making and analysis in portfolio management.
- We are committed to exercising our rights and responsibilities in Asset Management as a long-term shareholder to influence the target companies' responsibility for the environment, social factors and good governance. Among other things, we participate in the annual general meetings and nomination committees of the target companies we own and engage in dialogue with them.
- We are committed to acting transparently and promoting appropriate sustainability reporting by our investees.
- We promote the development of sustainable investing and services.
- We are committed to working in cooperation with stakeholders to ensure the continuous development of our operations. We monitor the performance of the funds managed by our Asset Management in terms of potential sustainable investments and the so-called PAI indicators of adverse impacts on sustainability factors using service providers' tools. If necessary, we engage with companies based on performance.

5.2. Financing activities

- We make responsible credit decisions based on an objective assessment of customers' repayment ability.
- We provide responsible financing in line with customers' needs, while developing sustainable financing products and services.
- We take responsibility into account as part of our credit risk strategy and credit management guidelines.
- We promote the consideration of sustainability issues that are relevant to the Savings Banks Group, our customers and our operations. We engage in stakeholder interaction and participate in sustainability initiatives to ensure continuous development in terms of sustainability.
- We reduce the risk of negative social and environmental impacts and shortcomings in good governance related to our financing activities together with our customers. We take into account ESG risks and opportunities, such as climate and environmental risks, in our customers' operations in accordance with the credit guidelines.

- We are committed to preventing financial crime and incorporate measures to manage these risks into our financing activities.

5.3. Advisory services

- We are committed to improving our expertise and knowledge of the environmental, social and governance aspects that are relevant in the advisory services related to our products and services.
- We are committed to improving our advisory services by providing our customers with guidance on how to ensure a safe and secure service experience and make informed decisions on the environmental, social and governance aspects of our products and services, and to be transparent about such aspects and consider the sustainability preferences of our customers.
- We are committed to increasing the integration of existing and emerging environmental, social and governance aspects that are relevant when developing advice on products and services.
- We are committed to acquiring information, evaluating it and using a variety of analytical tools to support our advisory services.

6. Responsible lending practices

In terms of financing, we comply with the principles set out in the credit risk strategy, credit management guidelines and any responsibility guidelines relating to lending. We engage in responsible lending in accordance with the credit guidelines, taking into account the ESG factors and risks of the financing targets and applying exclusion criteria and restrictions. Exclusion criteria define the sectors or customer types that do not fulfil the Savings Banks Group's criteria. In addition, we have defined activities that we want to support and that create opportunities for the Savings Banks Group's customers, and we have established ESG criteria for sustainable lending.

7. Responsible investment practices

Investment in the Savings Banks Group refers to the management of the investment assets of the member credit institutions of the Savings Banks' Union Coop, which acts as the central institution, and other entities belonging to the Amalgamation, or the investment of customer funds.

In Savings Banks' Asset Management, we comply with the principles for responsible investment, which describe in more detail the responsible investment methods we use for customer assets, which are:

- Taking ESG risks and factors into account, including the Principal Adverse Impacts on sustainability
- Thematic impact investing and prioritisation
- Exclusion, which determines the sectors or investment targets that do not meet the criteria of Savings Banks' Asset Management or for which more specific restrictions have been set.
- Monitoring compliance with international norms and agreements

- Active ownership and influence in accordance with Sp-Fund Management Company's ownership policy.

In addition to the exclusion principles of Savings Banks' Asset Management, the member credit institutions of the Savings Banks' Union Coop and other entities belonging to the Amalgamation may also have principles that are stricter than the above exclusion principles of Savings Banks' Asset Management.

8. Reporting

The Savings Banks Group reports on its sustainability activities as part of its annual sustainability report. We publish these reports on our website at www.saastopankki.fi.

The sustainability policy enters into force on 1 January 2026.