

# Policy for marketing and provision of product information for products and services



Version	Date	Document owner	Decision	Status
1.0	10 May 2022	Market and products	Group Management	Adopted

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## 1 BACKGROUND

Sparebanken Sør's mission is to "Create sustainable growth and development for our region".

Our work on sustainability (ESG – Environmental, Social and Governance), which encompasses the climate and nature, social conditions and corporate governance, is a natural continuation of the role the bank has played for almost 200 years. For Sparebanken Sør, sustainable development means that the bank should contribute to positive development within ESG, while safeguarding the bank's social responsibility in areas where the bank operates. Our work on sustainability should strengthen our competitiveness and reduce the bank's ESG risk. As an employer, investor, lender and supplier of financial products and services, the bank should contribute to sustainable growth and development by strengthening the positive and reducing the negative impacts on people, society, the climate and the natural environment.

Sparebanken Sør's policy is intended to ensure that the bank's products and services do not contribute to violations of human and employee rights, or of product and service information, data and information security, labelling or marketing regulations; or to corruption or the financing of terrorism; or to serious damage to the climate and nature or other unethical actions.

In marketing and selling financial products and services, we communicate with different groups of people in our market areas. Sparebanken Sør wishes to act ethically in respect of the individual financial requirements and aims of our customers, and to help them realise their wishes, with regard to both sustainable investments and day-to-day financial transactions. Our goal is to build long-term customer relationships and remain the preferred supplier of financial products and services for generations to come.

## 2 PURPOSE

This policy applies to the marketing and provision of product information for products and services. The policy is intended to ensure that Sparebanken Sør, in marketing, providing product information and advising on and selling products and services, acts responsibly, complies with regulatory requirements and internal procedures and guidelines, and contributes to sustainable development.

The overarching objective of the policy is to:

- safeguard customers' interests in all stages of the customer journey
- avoid potential damage, loss or other negative consequences for our customers
- ensure compliance with regulatory requirements for product information and marketing
- ensure that we do not offer products or services that contravene the bank's risk frameworks
- avoid potential harm to consumers
- minimise conflicts of interest
- stimulate sustainable products and services

## 3 TARGET GROUP

This policy applies to the entire Sparebanken Sør Group. Everyone at Sparebanken Sør with responsibility for marketing, product development, product information, and advising on and selling products and services must have read and familiarised themselves with, and comply with, this policy.

This policy applies to both products and services the bank sells itself and products and services that the bank distributes through our partners.

## 4 GUIDELINES FOR MARKETING AND PRODUCT INFORMATION

These guidelines are intended to ensure that the bank complies with all relevant laws, regulations and internal governing documents. This includes:

- the Norwegian Act relating to the control of marketing and contract terms and conditions, etc. (Norwegian Marketing Control Act)
- Regulations on the marketing of credit
- Regulations on price information for goods and services (Price Information Regulations)
- the Norwegian Act relating to certain aspects of electronic commerce and other information society services (Norwegian Electronic Commerce Act)
- the Norwegian Act relating to conclusions of agreements, the right to deposit an item of debt, limitation of claims (Norwegian Contracts Act)
- the Norwegian Sale of Goods Act
- the Norwegian Act on the obligation to provide information and the right of withdrawal in the case of distance sales and sales outside permanent business premises (Norwegian Cancellation Act)
- risk assessment of products, services, procedures, processes and systems
- policy for new and amended products and systems

The following guidelines apply to Sparebanken Sør's marketing, provision of product information and advice and sale of products and services.

- We must not offer products and services that contravene regulatory requirements, Sparebanken Sør's sustainability strategy or Code of Conduct, risk frameworks or other requirements laid down in the bank's governing documents and guidelines.
- We must only offer products and services that safeguard our customers' interests and needs.
- If the product or service is not suitable for a particular customer group, this must be clearly stated in the product information and advice provided.
- Products and services must be distributed in a suitable channel that ensures that the product or service is marketed and sold to the defined target group.
- Qualities and terms, including risk and the total price of the product or service, must be clearly stated and be understandable for the customer group the product or service is aimed at.
- To safeguard customers' interests and comply with generally accepted business practice, products and services must only be distributed by employees who have received training that ensures that they sufficiently understand the product or service's functions, qualities and risks. If the product or service is offered through a distributor or third party, similar requirements must be met.
- Product information should state whether the product or service has a positive or negative impact on sustainability, including on the climate and the natural environment, social conditions and corporate governance.
- Products must be monitored and remedial measures implemented where such monitoring identifies product defects or weaknesses.
- Marketing must be in line with generally accepted marketing practice and always comply with the legislation, regulations, guidelines and industry standards that are relevant to the area.
- Products and services must be marketed in such a way that customers are made aware of both the benefits/opportunities and drawbacks/limitations.
- We must pay close attention to ethics and our moral responsibility and apply the precautionary principle in providing information about and marketing products and services.
- In marketing, the bank must pay special attention to vulnerable groups and never intentionally offer products to these groups that could increase their vulnerability – for example, offer credit cards or personal loans to customers with high, unsecured liabilities, or similar.
- Caution must be exercised in marketing to children and young people.
- All data-based communication activities must meet the applicable regulations for marketing and privacy and the approvals granted by the individual customer.

- Marketing must be based on sound insights and analyses and ensure that the bank communicates with customers in the most relevant manner possible.
- Use of artificial intelligence and advanced data analysis must comply with the applicable regulatory framework, relevant industry standards and general standards for ethical and professional use of artificial intelligence and advanced data analysis.
- Communication must as far as possible take place on digital platforms and avoid producing paper documents.
- When marketing products and services, we must focus on avoiding “greenwashing”. Marketing and profiling of sustainability information must be fact-based.
- Customer complaints and other undesired incidents relating to products and services must be registered in the Group’s incident database and be processed with the minimum harm to customers, and so that measures are implemented to avoid similar incidents recurring in the future.

## 5 ORGANISATION

Each division, product and service owner is responsible for ensuring that the policy and guidelines are complied with in their own area of responsibility.

Divisions responsible for marketing and products are responsible for the document “Policy for marketing and provision of product information for products and services”.

## 6 KPIs

Sparebanken Sør has the following objectives for marketing and product information:

KPI	Description	Unit	Goal	Time
KPI D1	Lost cases, breach of product/service information	Number	0	Y
KPI D2	Lost cases, breach of marketing communications	Number	0	Y

## 7 FOLLOW-UP AND REPORTING

Continuous monitoring of products and services must be carried out to ensure that no incidents occur or have occurred that negatively impact the customers’ or the bank’s interests.

The respective divisions are responsible for systematically following up their portfolio and making ongoing assessments relating to defects or change requirements.

Customer complaints and other undesired incidents relating to the marketing and provision of information for products and services are followed up in accordance with the bank’s procedures, and are reported quarterly in the bank’s incident database and annually in the bank’s sustainability report.