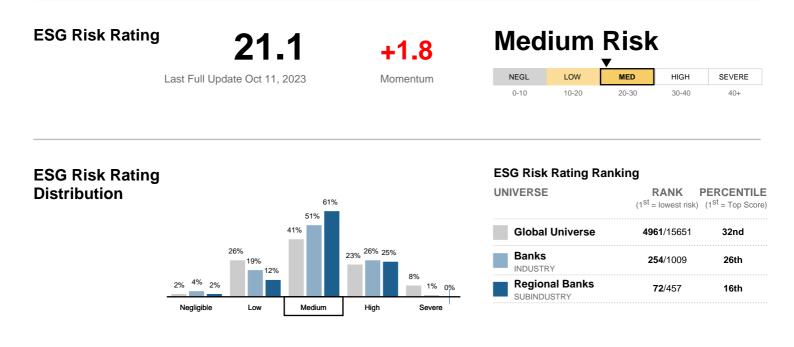
Regional Banks Norway OSL:MORG



Peers Table

Peers (Market cap \$0.4 - \$0.4bn)	Exposure	Management	ESG Risk Rating
1. Sparebanken Møre	38.5 Medium	47.3 Average	21.1 Medium
2. Glarner Kantonalbank AG	43.0 Medium	37.9 Average	27.7 Medium
3. Bar Harbor Bankshares	44.7 Medium	37.2 Average	29.1 Medium
4. Alerus Financial Corp.	43.9 Medium	34.2 Average	29.8 Medium
5. SmartFinancial, Inc.	42.1 Medium	29.2 Average	30.6 High



Regional Banks Norway OSL:MORG

ESG Risk Analysis

Exposure refers to the extent to which a company is exposed to different material ESG Issues. The exposure score takes into consideration subindustry and company-specific factors such as its business model.

ESG Risk Exposure 38.5 +1.0 Medium Momentum

Beta = 0.99

Sparebanken More faces increasing regulatory and business risks stemming from growing climate reporting obligations in Europe, such as the Corporate Sustainability Reporting Directive (CSRD), and from its exposure to clients from real estate and offshore sectors that face physical and transition risks and are subject to the EU Taxonomy. Moreover, regulatory scrutiny over protection of consumer rights is growing, following the introduction of the Norwegian Financial Contract Act that entered into force in January 2023. Finally, the bank's significant reliance on technology exposes it to data breaches and cyberattacks that can cause operational disruptions, customer dissatisfaction and litigation.

The company's overall exposure is medium and is similar to subindustry average. Product Governance, Data Privacy and Security and ESG Integration -Financials are notable material ESG issues.

Management refers to how well a company is managing its relevant ESG issues. The management score assesses the robustness of a company's ESG programs, practices, and policies.



Product Governance is the material ESG issue for which Sparebanken More exhibits the weakest management. The bank's responsible marketing policy is not detailed enough, and its responsible product offering is weak. The bank is taking measures to prepare for upcoming sustainability regulation, but its climate reporting and double materiality analysis are still in their infancy and lack sophistication. Furthermore, its credit and loan standards lack detail and it does not disclose the share of its responsible assets under management. Lastly, its data privacy programme and cybersecurity programme have strong governance structures, but the latter lacks regular external security audits.

The company's overall management of material ESG issues is average.



Regional Banks Norway OSL:MORG

Material ESG Issues

These are the Material ESG Issues driving the ESG Risk Rating.

Issue Name	ESG Risk Exposure Score Category	ESG Risk Management Score Category	ESG Risk Rating Score Category	Contribution to ESG Risk Rating
Product Governance	8.0 High	25.0 Average	6.0 High	28.5%
Corporate Governance	9.0 High	46.6 Average	4.8 Medium	22.8%
ESG Integration -Financials	5.0 Medium	44.5 Average	2.8 Low	13.2%
Data Privacy and Security	6.0 Medium	70.0 Strong	2.6 Low	12.5%
Human Capital	4.8 Medium	51.4 Strong	2.4 Low	11.5%
Business Ethics	5.7 Medium	60.6 Strong	2.4 Low	11.5%
Overall	38.5 Medium	47.3 Average	21.1 Medium	100.0%

Events Overview

Category (Events)

Identify events that may negatively impact stakeholders, the environment, or the company's operations. A Severe (0)

- 🛆 High (0)
- ▲ Significant (0)
- \land Moderate (0)
- \rm Low (0)



Regional Banks Norway OSL:MORG

Events Overview

Identify events that may negatively impact stakeholders, the environment, or the company's operations.

Category (Events)

M None (15)

Access to Basic Services

Anti-Competitive Practices

Business Ethics

Data Privacy and Security

Labour Relations

Marketing Practices

Sanctions

Society - Human Rights

Accounting and Taxation

Bribery and Corruption

Carbon Impact of Products

Environmental Impact of Products

Lobbying and Public Policy

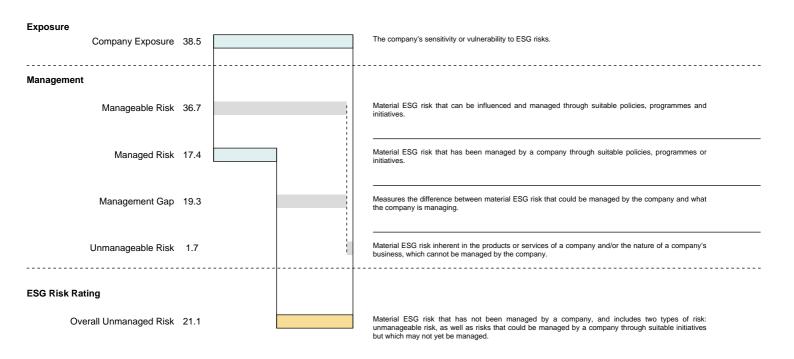
Quality and Safety

Social Impact of Products



Regional Banks Norway OSL:MORG

Risk Decomposition



Momentum Details





Regional Banks Norway OSL:MORG

GLOSSARY OF TERMS

Beta (Beta, β)

A factor that assesses the degree to which a company's exposure deviates from its **subindustry**'s exposure on a **material ESG issue**. It is used to derive a company-specific issue exposure score for a material ESG issue. It ranges from 0 to 10, with 0 indicating no exposure, 1 indicating the subindustry average, and 10 indicating exposure that is ten times the subindustry average.

Corporate Governance Pillar

A pillar provides a signal about a company's management of a specific Corporate Governance issue.

ESG Risk Category

Companies' ESG Risk Rating scores are assigned to five ESG risk categories in the ESG Risk Rating:

Negligible risk: enterprise value is considered to have a negligible risk of material financial impacts driven by ESG factors

Low risk: enterprise value is considered to have a low risk of material financial impacts driven by ESG factors

Medium risk: enterprise value is considered to have a medium risk of material financial impacts driven by ESG factors

High risk: enterprise value is considered to have a high risk of material financial impacts driven by ESG factors

Severe risk: enterprise value is considered to have a severe risk of material financial impacts driven by ESG factors

Note that because ESG risks materialize at an unknown time in the future and depend on a variety of unpredictable conditions, no predictions on financial or share price impacts, or on the time horizon of such impacts, are intended or implied by these risk categories.

ESG Risk Rating Score (Unmanaged Risk Score)

The company's final score in the ESG Risk Rating; it applies the concept of risk decomposition to derive the level of unmanaged risk for a company.

Event Category

Sustainalytics categorizes events that have resulted in negative ESG impacts into five event categories: Category 1 (low impact); Category 2 (moderate impact); Category 3 (significant impact); Category 4 (high impact); and Category 5 (severe impact).

Event Indicator

An indicator that provides a signal about a potential failure of management through involvement in controversies.

Excess Exposure

The difference between the company's exposure and its subindustry exposure.

Exposure

A company or $\ensuremath{\textit{subindustry's}}$ sensitivity or vulnerability to ESG risks.

Idiosyncratic Issue

An issue that was not deemed material at the **subindustry** level during the **consultation process** but becomes a **material ESG issue** for a company based on the occurrence of a Category 4 or 5 event.

Manageable Risk

Material ESG risk that can be influenced and managed through suitable policies, programmes and initiatives.

Managed Risk

Material ESG Risk that has been managed by a company through suitable policies, programmes and initiatives.

Management

A company's handling of ESG risks.

Management Gap

Refers to the difference between what a company has managed and what a company could possibly manage. It indicates how far the company's performance is from best practice.

Management Indicator

An indicator that provides a signal about a company's management of an ESG issue through policies, programmes or quantitative performance.

Material ESG Issue

A core building block of the ESG Risk Rating. An ESG issue is considered to be material within the rating if it is likely to have a significant effect on the enterprise value of a typical company within a given subindustry.

Subindustry

Subindustries are defined as part of Sustainalytics' own classification system.

Unmanageable Risk

Material ESG Risk inherent from the intrinsic nature of the products or services of a company and/or the nature of a company's business, which cannot be managed by the company if the company continues to offer the same type of products or services and remains in the same line of business.

Unmanaged Risk

Material ESG risk that has not been managed by a company, and includes two types of risk: **unmanageable risk**, as well as risks that could be managed by a company through suitable initiatives, but which may not yet be managed (management gap).



Regional Banks Norway OSL:MORG

DISCLAIMER

Copyright ©2023 Sustainalytics. All rights reserved.

The information, methodologies, data and opinions contained or reflected herein are proprietary of Sustainalytics and/or content providers, intended for internal, non-commercial use and may not be copied, distributed or used in any other way, including via citation, unless otherwise explicitly agreed in writing.

They are provided for informational purposes only and (1) do not constitute an endorsement of any product, project, investment strategy or consideration of any particular environmental, social or governance related issues as part of any investment strategy; (2) do not constitute investment advice, nor represent an expert opinion or negative assurance letter; (3) are not part of any offering and do not constitute an offer or indication to buy or sell securities, to select a project or make any kind of business transactions; (4) are not an assessment of the issuer's economic performance, financial obligations nor of its creditworthiness; (5) are not a substitute for professional advice; (6) past performance is no guarantee of future results; (7) have not been submitted to, nor received approval from, any relevant regulatory bodies.

These are based on information made available by third parties, subject to continuous change and therefore are not warranted as to their merchantability, completeness, accuracy, up-to-datedness or fitness for a particular purpose. The information and data are provided "as is" and reflects Sustainalytics' opinion at the date of its elaboration and publication.

Neither Sustainalytics nor any of its content providers accept any liability for damage arising from the use of the information, data or opinions contained herein, or from the use of information resulting from the application of the methodology, in any manner whatsoever, except where explicitly required by law.

Any reference to content providers' names is for appropriate acknowledgement of their ownership and does not constitute a sponsorship or endorsement by such owner. A list of our content providers and their respective terms of use is available on our website. For more information visit http://www.sustainalytics.com/legal-disclaimers.

Sustainalytics may receive compensation for its ratings, opinions and other deliverables, from, among others, issuers, insurers, guarantors and/or underwriters of debt securities, or investors, via different business units. Sustainalytics believes it has put in place appropriate measures designed to safeguard the objectivity and independence of its opinions. For more information visit **Governance Documents** or contact **compliance@sustainalytics.com**.

