

GRI Standards – Index

1 February 2024

Deloitte.

Independent Auditor's Assurance Report

To the Management and the stakeholders of Landsbankinn hf.

We have been engaged by Landsbankinn hf. to provide reasonable assurance on Landsbankinn's GRI Standards index table for the year 2023 ("the Report") disclosed as part of Landsbankinn's Annualand Sustainability report for the year 2023.

Our engagement was performed in order to:

- Assess whether the GRI Standards Index table for the year 2023 is presented according to GRI Standards;
- Assess underlying data processes and methods

We express a conclusion providing reasonable assurance.

Management's responsibility

The Management of Landsbankinn is responsible for collecting, analysing, aggregating and presenting the information in the report, ensuring that the information is free from material misstatement, whether due to fraud or error.

Our independence and quality control

We have complied with the independence and other ethical requirements of the Code of Ethics for Professional Accountants (IESBA Code), which are based on the fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Deloitte ehf. is subject to International Standard on Quality Management (ISQM) 1 and, accordingly, applies a comprehensive quality control system, including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Auditor's responsibility

Our responsibility is to express a reasonable assurance conclusion on GRI Standards index table in the Report. We have conducted our work in accordance with ISAE 3000 (revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information, to obtain reasonable assurance about our conclusion. In accordance with the standard we have planned and performed our work to obtain reasonable assurance about whether the Report is free from material misstatement.

Reasonable assurance is a high level of assurance but is not a guarantee that a review conducted in accordance with ISAE 3000 (revised) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decisions of users taken on the basis of the Report. Considering the risk of material misstatement, we planned and performed our work to obtain all information and explanations necessary to support our conclusion.

We performed reviews of data, recalculation of selected key performance indicators, reviews of the underlying data processes as well as interviews with those responsible for producing and preparing the data. Our work has included interviews with key employees of Landsbankinn, inquiries regarding procedures and methods to ensure that selected GRI indicators have been incorporated in accordance with the guidelines in GRI Standards. We have assessed processes, tools and controls for gathering, consolidating and aggregating GRI data at Landsbankinn, and performed analytical review procedures and tested data prepared against underlying documentation. Furthermore, we have evaluated the overall presentation in GRI Standards Appendix of the Report, including the consistency of information.

Conclusion

Based on the procedures we have performed and the evidence we have obtained, in our opinion, the Landsbanki's GRI Standard Index table for the year 2023 is in all material respect in accordance with GRI Standards, and disclosures in the GRI Standards Appendix presented in accordance with disclosed indicators.

Kópavogi, February 1, 2024

Deloitte ehf.

Birna Maria Sigurdardáttir

Birna María Sigurðardóttir State Authorised Public Accountant

GRI Standards - Index

Landsbankinn has reported in accordance with the GRI Standards for the period 1 January 2023 to 31 December 2023.

Title of GRI 1 used: GRI 1: Foundation 2021.

Reported disclosures from the GRI Standards, including the disclosure titles, can be found in the index below.

The titles of the GRI Standards that the reported disclosures come from are:

- GRI 2 General Disclosures 2021
- GRI 3 Material Topics 2021

GRI 201 Economic Performance 2016

- GRI 202 Market Presence 2016
- GRI 203 Indirect Economic Impact 2016
- GRI 204 Procurement Practices 2016
- GRI 205 Anti-corruption 2016
- GRI 206 Anti-competitive Behaviour 2016
- GRI 302 Energy 2016
- GRI 305 Emissions 2016
- GRI 306 Effluents and Waste 2020
- GRI 308 Supplier Environmental Assessment 2016
- GRI 401 Employment 2016
- GRI 402 Labor/Management Relations 2016
- GRI 403 Occupational Health and Safety 2018
- GRI 404 Training and Education 2016
- GRI 405 Diversity and Equal Opportunity 2016
- GRI 406 Non-discrimination 2016
- GRI 407 Freedom of Association and Collective Bargaining 2016
- GRI 408 Child Labour 2016
- GRI 409 Forced or Compulsory Labour 2016
- GRI 413 Local Communities 2016
- GRI 414 Supplier Social Assessment 2016
- GRI 415 Public Policy 2016
- GRI 417 Marketing and Labelling 2016
- GRI 418 Customer Privacy 2016
- Financial Sector Supplement

A list of the Bank's material topics is included in the GRI Standards Appendix on pages 3-5.

The GRI Sector Standard disclosures for banks has not been published yet. Material topics were evaluated according to GRI methods as described in GRI 3 Material Topics 2021. As a result, there are no applicable GRI Sector Standard material topics that Landsbankinn has determined to be non-applicable

The company and disclosure

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Disclos	ure				
2-1	About the company	Yes	Landsbankinn hf., registered address Aus- turstræti 11, 155 Reykjavík, was at year-end 2023 98.2% owned by the National Treasury of Iceland. Landsbankinn holds 1.58% of own shares and other shareholders, current and former employees of Landsbankinn and former guarantee capital owners of the savings banks Sparisjóður Vestmannaeyja and Sparisjóður Norðurlands (other than the state), hold 0.22%. Landsbankinn does not operate outside of Iceland.		
2-2	Entities included in the organization's sustain- ability reporting	Yes	Landsbankinn's GRI report includes only the parent Landsbankinn hf.		
2-3	Reporting period, frequency and contact point	Yes	Landsbankinn's GRI Report is for the period 1 January 2023 to 31 December 2023, mirroring the company's Annual Financial Statement and Annual & Sustainability Report. The GRI Report is published as part of the Bank's sustainability statement on 2 February 2024. It will also be published as part of the Bank's Annual & Sustainability Report around mid-February 2023. Please direct queries about the Report to sjalfbaer- ni@landsbankinn.is		
2-4	Restatement of infor- mation	Yes	Full-time positions have been updated to man-hours in accordance with the Act on Annual Accounts 3/2006. We no longer publish energy consumption on the group level, but only the energy consumption of the parent company, as the subsidiary moved out of shared premises during the year.		
2-5	External assurance	Yes	Deloitte audits Landsbankinn's GRI Stan- dards report. The auditor's endorsement accompanies the report. Landsbankinn's GRI Report has twice been audited with limited assurance and is now for the first time au- dited as reasonable assured. Landsbankinn's Sustainability Policy, approved by the Board of Directors and Executive Board, aims to show initiative in disclosure on sustain- ability issues. Good information disclosure practices include review of the data present- ed to ensure reliability and quality. Details about the auditing process and the resonable assurance endorsement is provided in De- loitte's endorsement statement. The business relationship between Landsbankinn and Deloitte involves and agreement providing for this audit that is paid for in accordance with an accepted offer. Ownership of the two companies is completely separate.		G10

Activities and organisation

Disclo	sure				
2-6	Activities, value chain and other business relationships	Yes	Landsbankinn provides traditional lending and deposit service plus market transactions, fund management through subsidiary Lands- bréf, corporate finance, private banking and asset management services. Landsbankinn's Covenant of Ethical Conduct stipulates that staff is to act professionally and honestly by seeking information, abiding by law, rules, accepted work procedures and other criteria applying to their work in each instance. In addition to obeying general legislation on consumer protection and marketing, the Bank complies with the guiding ethics of the Society of Icelandic Advertising Agencies and the guidelines of the Consumer Spokesman and Ombudsman for Children on marketing targeting children. No comments or legal complaints were received in 2019. No significant changes were made to Lands- bankinn's supply chain, ownership or the company itself in 2023. Information about the size/scope of Landsbankinn is included in an appendix to the GRI index report, p. 7. The Bank's procurement categories describe its supply chain and are provided in the table Proportion of supplier turnover by category that is included as an appendix to the GRI index report, p. 7.		
2-7	Personnel	Yes	Appendix p. 7-9	8 datamente standertra	S4, S5
2-8	Workers who are not employees	Yes	Appendix p. 10		

Governance

Disclosure								
2-9	Organisational struc- ture and committees	Yes	Corporate governance statement		5 martin E	G2		
2-10	Nomination and selection of senior management	Yes	Corporate governance statement			G2		
2-11	Chairman of the Board	Yes	Corporate governance statement					
2-12.	Role of the highest governance body in overseeing the man- agement of impacts	Yes	Appendix p. 10			E8, E9		
2-13	Delegation of respon- sibility for managing impacts	Yes	Delegated through the Bank's Sustainability Policy which is approved by the Board of Directors.			E8, E9		
2-14	Role of the highest governance body in sustainability reporting	Yes	The Managing Director of Finance reviews the material topics and methodology used to determine the topics. Details on the method- ology are included in the chapter on Lands- bankinn's material topics. One of the Bank's goals under its sustainability platform is to share sustainability information and all of the Bank's sustainability goals are approved by the Executive Board.					
2-15	Conflict of interest	Yes	Corporate governance statement					

2-16.	Communicating critical concerns	Yes	The Rules of Procedure for the Board of Directors provide for the correct channels to communicate critical concerns to the highest governance body. The Bank makes public information about certain issues submitted to the Board of Directors, such as interim and annual financial results. Other issues handled bu the Board of Direcotrs are subject to confidentiality.		
2-17	Collective knowledge	N	Corporate governance statement		
2-17	of highest governance body	Yes	Rules of Procedure for the Board of Directors		
2-18	Evaluating the highest governance body's performance	Yes	Corporate governance statement		
			Remuneration Committee		
2-19.	Remuneration policies	Yes	Annual financial statement - Notes to the consolidated financial statement		G3
	Process to determine		Remuneration Committee		
2-20	remuneration	Yes	Annual General Meeting of Landsbankinn 2023		
2-21	Annual total compen- sation ratio	Yes	The ratio of total wages paid to the CEO and median total wages of full-time employees is 5.4		S1

Strategy, strategic goals and work practices

Disclos	ure				
2-22	Statement on policy for sustainable develop- ment	Yes	The Sustainability Policy is available on the Bank's website.		
2-23	Obligations according to strategic goals	Yes	The Sustainability Policy of Landsbankinn is a Board of Directors, see the Sustainability Polic		G5, G6
2-24	Embedding policy commitments	Yes	Landsbankinn's sustainability goals are based on its Sustainability Policy and ap- proved by the Executive Board.		
2-25	Processes to remediate negative impacts	In part	Landsbankinn considers its greatest impact on sustainability to lie in emissions from its credit and asset portfolios. Emissions from the credit portfolio was initially calculated using PCAF methodology in 2021 for 2019. Landsbankinn's latest PCAF Report measures emissions from the credit portfolio for 2022 and is published in early 2024. The Bank determined to apply for approval of its goals to achieve reduction in indirect emissions by the Science-Based Target initiative in 2023. Measurable and time-bound goals for a reduction in direct emission are scheduled to be finalised in the first quarter of 2024.	Data missing	
2-26	Mechanisms for seek- ing advice and raising concerns	Yes	See indicators 205-1-2-3 in this table		
2-27	Compliance with laws and regulations	Yes	There were no incidents of non-compliance with environmental laws and rules in 2023 nor any non-compliance with laws and regulations in the social and economic area in 2023.		
2-28	Memberships and part- nerships	Yes	Appendix p. 11		
Stakeho	lders' involvement				

Disclosı	ure					
2-29	Approach to stakehold- er engagement		Appendix p. 2			
2-30	Collective bargaining agreements		All Landsbankinn employees receive benefits under the collective bargaining agreement between the Confederation of Icelandic Bank and the Confederation of Icelandic Employers, from the Landsbankinn Employee Association and Landsbankinn hf.		8 diarrana Alian	G4
Materia	al topics					
3-3	Description of material topics, a list of materi- al topics and approach to their management.	Yes	<u>Appendix p. 2-3</u>			E7, S6, S8, S9, S10, G5, G6
Financia	al performance					
201-1	Direct economic value generated and distributed	Yes	<u>Appendix p. 12</u>		8 doutines of munchas	
201-2	Financial implications and other risks and opportunities due to climate change	Yes	Sustainability risk is defined as risk that stems from the current or prospective impact of environmental, social and gover- nance (ESG) factors on the Bank's counter- parties or invested assets. Sustainability risk materialises through the amplification of traditional categories of financial risks. Detailed information about sustainability risk is included in the Bank's Pillar III risk report, in the chapter on Sustainability Risk.			
201-3	Defined benefit plan obligations and other retirement plans		In addition, Landsbankinn pays the equivalent of 5.5% of employee wages to a personal pension fund for the first three years of employment and 7% for subsequent years. The right to this payment is subject to the same rule as other seniority rights for employment at other financial undertakings. There are future liabilities due to pension plans for Sparisjóður Vestmannaeyja and Sparisjóður Bolungarvíkur on the Bank's books. No future liabilities due to incentive systems are on the Bank's books.			
201-4	Financial assistance received from govern- ment		The State Treasury is the Bank's largest own- er with a 98.2% share and the endowment capital has not been considered a govern- ment grant.			
Market	presence					
202-1	Ratios of standard entry level wage by gender compared to local minimum wage	No		Indicator 405-2 shows a break- down of salaries by gender and job category. Statis- tics for general minimum wages by job category is not available for the Bank. This prevents any significant comparison of beginners' wages by gender as beginners' wages differ across job categories.	5 mm 9 mm 10 mm	

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202-2	Proportion of senior management hired from the local com- munity		Landsbankinn defines Iceland as its local community and all senior management is Icelandic.		8 8 80 80 80 80 80 80 80 80 80 80 80 80	
Indirect	economic impact	·				
203-1	Infrastructure invest- ments and services supported		Support for the community		5 maan 9 monore 9 monore 10 monore	
203-2	Significant indirect economic impacts	No		The scope of any significant indirect eco- nomic impact by Landsbankinn's operation on the community has not been assessed in more detail than disclosed in the materiality analysis in the appendix to the GRI Standards index.	8 teams	
Procure	ment impact					
204-1	Proportion of spending on local suppliers	Yes	Appendix p. 12-13		8 columned columned	
Anti-co	rruption					
205-1	Operations assessed for risks related to corruption	Yes	<u>Appendix p. 14</u>			
205-2	Communication and training about anti-cor- ruption policies and procedures	Yes	<u>Appendix p. 14</u>			
205-3	Confirmed incidents of corruption and actions taken	Yes	<u>Appendix p. 15</u>			
Anti-co	mpetitive behaviour					
206-1	Legal actions for anti-competitive be- haviour, anti-trust, and monopoly practices	Yes	No instances in 2023			
Enviro	nmental					
Energy						
302-1	Energy consumption within the organization	Yes	Appendix p. 16		8 deurowa wadecta 13 latera acoulum	E3, E5
302-2	Energy consumption outside of the organi- zation	Yes	<u>Appendix p. 16</u>		8 columentar	E3, E5
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E4

302-3

Energy intensity

Yes

Appendix p. 16

302-4	Reduction of energy consumption	No	To reduce energy consumption, the Bank is phasing out all light bulbs other then LED. No other action has been deter- mined.		
302-5	Reductions in energy requirements of prod- ucts and services	No	No assessment has been made of options to reduce the energy need of products and services.	8 sector Million Sector Million Sector	

Emissions

305-1	Direct (Scope 1) GHG emissions	Yes	<u>Appendix p. 16</u>		13 Alexand Constantial Constantial	E1			
305-2	Energy indirect (Scope 2) GHG emissions	Yes	<u>Appendix p. 17</u>		13 Additional Internationalism	E1			
305-3	Other indirect (Scope 3) GHG emissions	Yes	<u>Appendix p. 17-18</u>		13 And cased	E1			
305-4	GHG emissions intensity	Yes	<u>Appendix p. 19</u>		13 Additional Internationalism	E1			
305-5	Reduction of GHG emissions	Yes	Appendix p. 19		13 ADCRAMI INFELECONALIN				
305-6	Emissions of ozone-de- pleting substances (ODS)	Yes	No cooling agents were used in 2023 and therefore no emissions to report						

Effluents and waste

306-2	Waste by type and disposal method	Yes	<u>Appendix p. 20-21</u>			
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Supplier environmental assessment

308-1	New suppliers that were screened using environmental criteria	In part	Requests for bids from new suppliers always include questions about sustainability.		
308-2	Negative environ- mental impacts in the supply chain and actions taken	No		No assessment has been carried out on the nega- tive environmen- tal impact in the Bank's supply chain nor any related action taken.	

Community

Employr	Employment							
401-1	New employee hires and employee turnover	Yes	<u>Appendix p. 22-24</u>		5 HARRETT S HOLENA S COLUMPANE S COLUMPAN	S3		
401-2	Benefits provided to full-time employees that are not provided to temporary or part- time employees	Yes	<u>Appendix p. 24</u>		5 antes E			
401-3	Parental leave	Yes	<u>Appendix p. 25</u>					

Labour	Management relations				
402-1	Minimum notice periods regarding oper- ational changes	Yes	The general notice period is as follows: Trial employees – 2 months Permanent employ- ees – 3 months Permanent employees with more than 10 years' work experience at a financial undertaking or at least 45 years of age - 6 months Managing Directors - 12 months		8 man.
Occupat	tional health and safety				
403-1	Governance of health and safety	In part	Landsbankinn has a Health and Safety Com-	Data missing.	8 diameter
403-2	Hazard identification, risk assessment, and incident investigation	In part	mittee as provided for in Act No. 46/1980 on Facilities, Health and Hygiene Procedures and Safety in the Workplace. The Bank	Data missing.	8 dituren
403-3	Occupational health services	In part	appoints two persons and the employees' association elects two other persons to the committee. The committee meets regularly	Data missing.	8 damme Minister
403-4	Worker participation, consultation, and communication on occupational health and safety	In part	and participation by representatives of the employees' association ensures collaboration with union representatives throughout the country.	Data missing.	8 that the second secon
403-5	Employee health and safety training	No		There has not been deemed need for employ- ee health and safety training.	8 WARNA
403-6	Promotion of worker health	Yes	Employees can apply for a sports grant that accords with limits set by the Directorate of Internal Revenue, currently ISK 71,500 per calendar year. Every other year, all employ- ees are offered detailed health checks by the consulting physician or at a health care centre. Further details on Landsbankinn's human resources and health policies are available here on the Bank's website.		
403-8	Workers covered by an occupational health and safety manage- ment system	Yes	100%		8 mannes
Trainin	g and education				
404-1	Average hours of training per year per employee	Yes	Appendix p. 25		5 multin ©
404-2	Programs for upgrad- ing employee skills and transition assis- tance programs	Yes	Appendix p. 25-29		8 marres

404-3	Percentage of employ- ees receiving regular performance and career development reviews	No	Performance interviews at Landsbankinn are carried out be individual managers in line with the Bank's policy of boosting management independence. Performance interviews are carried out by each employees immediate superior who is the responsible party. As a general rule, there are three performance interviews per annum, each focusing on a different area. The number and focus of interviews may vary depending on the manager and job in question and may be combined in one comprehensive annual interview. The Bank does not have information about how many employees participated in performance interviews in 2023. A survey put to all employees during the year confirmed that 83% of employees had attended a performance interview in the past 12 months. 709 employees responded to the survey.		5 mm Ç	
Diversit	y and equal opportunity					
405-1	Diversity of gover- nance bodies and employees	Yes	<u>Appendix p. 29-30</u>		5 andres	S4, G1
405-2	Ratio of basic salary and remuneration of women to men	Yes	Appendix p. 31		8 consumed and address	S2
Equality	7					
406-1	Incidents of discrimi- nation and corrective actions taken	Yes	A work group was appointed around the review of the Bank's equality policy and agenda. The aim is to heighten diversity in the workplace even further and secure equal opportunities for all individuals. The results of the group's work should be forthcoming around mid-2024 and a new equality agenda hopefully presented in the second or early third quarter. No violations of the equility policy were reported in 2023		5 mm The second The se	
Freedon	n of association and colle	ctive bargaini	ng			
407-1	Operations and suppliers in which the right to freedom of association and collec- tive bargaining may be at risk	No		No assessment has been carried out to determine whether oper- ating segments and suppliers may be at risk as regards the right to freedom of association and collective bargaining.	8 @www.	
Child la	bour					
408-1	Operations and suppli- ers at significant risk for incidents of child labour	No		No assessment has been carried out to determine whether operat- ing segments and suppliers may be at significant risk for incidents of child labour.	8 manna M	

Forced	or compulsory labour				
409-1	Operations and suppli- ers at significant risk for incidents of forced or compulsory labour	No.		No assessment has been carried out to determine whether operat- ing segments and suppliers may be at significant risk for incidents of forced or compul- sory labour.	8 minuter
Local co	ommunities		1		
413-1	Operations with local community engage- ment, impact assess- ments, and develop- ment programs	No.		No assessment has been carried out to deter- mine whether operations have local community engagement.	
413-2	Operations with signif- icant actual and poten- tial negative impacts on local communities	No.		No assessment has been carried out to determine whether opera- tions may have significant actual and potential negative impacts on local commu- nities.	
Supplie	r social assessment	,		1	
414-1	414-1 New suppliers that were screened using social criteria	In part	Appendix p. 31-32		8 discussion
414-2	Negative social impacts in the supply chain and actions taken	No.		No assessment has been carried out to determine whether there are negative social impacts in the supply chain.	5 mm S and S a
Public p	policy			1	
415-1	Political contributions	Yes	No donations were made		
Market	ing and labelling				· · · ·
417-1	Requirements for product and service information and labelling	Yes	Requirements for product and service in- formation and labelling do not apply as the Bank does not manufacture products in the traditional sense.		
417-2	Incidents of non-com- pliance concerning product and service information and labelling	Yes	No known violations		
417-3	Incidents of non-com- pliance concerning marketing communi- cations	Yes	No known violations		

Personal data protection							
418-1	Substantiated com- plaints concerning breaches of customer privacy and losses of customer data	Yes	<u>Appendix p. 33</u>				

Financial sector supplement

Society					
G4- FS13	Access points in low-populated or economically disadvantaged areas by type	Yes	<u>Appendix p. 34</u>		
G4- FS14	Initiatives to improve access to financial ser- vices for disadvantaged people	Yes	<u>Appendix p. 34</u>		
Product	t responsibility				
G4- DMA (FS15)	Policies for the fair design and sale of financial products and services	Yes	Covenant of Ethical Conduct		
G4- DMA (FS16)	Action to improve financial literacy by target group	Yes	<u>Appendix p. 34</u>		
Product	ts				
G4- DMA (FS1)	Policies with specific environmental and social components ap- plied to business lines	Yes	Landsbankinn's Sustainability Policy con- tains a chapter on responsible lending, p. 6.		
G4- DMA (FS3)	Processes to monitor customer implementa- tion of and compliance with the environmen- tal and social provi- sions of contracts or in business transactions	In part	Landsbankinn's Sustainability Policy con- tains a chapter on responsible investment, p. 5.	Data missing.	
G4- DMA (FS1) (FS8)	Monetary value of products and services designed to deliver a specific environmental benefit for each busi- ness line broken down by purpose	Yes	<u>Appendix p. 33</u>		
Review	,				
G4- DMA (FS9)	Coverage and frequen- cy of audits to assess implementation of environmental and social policies and risk assessment procedures	Yes	Landsbankinn has a documented process to assess operational risk. All divisions undergo annual operational risk assessment. Operational risk is subsequently mapped on the group level. Where risk is higher than provided for in the Bank's current risk appe- tite, mitigating and preventative measures are applied and monitored. Assessment of operational risk extends to all components of operational risk, including insufficient or failing internal processes, human or system- ic factors or external events. The assessment is not adjusted to specifically assess environ- mental or sustainability policies.		

Active o	ownership				
G4- DMA (FS12)	Voting policy(ies) ap- plied to environmental or social issues for shares over which the reporting organization holds the right to vote shares or advises on voting	Yes	Landsbankinn has not adopted a voting pol- icy that applies to environmental or social concerns at AGMs where the Bank holds voting rights or advises on voting.		
G4- FS10	Percentage and num- ber of companies held in the institution's portfo- lio with which the reporting organization has inter- acted on environmen- tal or social issues	In part	This has been done in some cases but no figures have been collected.	Data missing.	
G4- FS11	Ratio of assets ana- lysed to determine environmental or social impact	In part	Landsbankinn's Sustainability Policy con- tains a chapter on responsible investment, p. 5. It states that all assets are evaluated for ESG guidelines set in the Policy. No statisti- cal data has been gathered to date.	Data missing.	