

The Boards report and Accounts 2018



Over the course of its 200-year history, Gjensidige has sought to create a sense of security for our customers by safeguarding life, health and assets. We have implemented loss prevention measures, and provided help when the damage was done. Our experience and expertise shall benefit society at large.

Sustainability

1. The Board's and the management's perspective on sustainability

Gjensidige has always had a strong focus on its corporate social responsibility, and this work is based on our role as one of the biggest insurance companies in the Nordic countries. We are convinced that integrating sustainability into our core activities is vital to value creation in the long term. Gjensidige takes its responsibility seriously and shall strive to make the world a better place.

A description of how we work on our obligations under the UN Global Compact follows below. Our work is also in accordance with the UNEP Principles for Sustainable Insurance. We describe our focus areas, goals, measures, the measures' effect and our ambitions for new measures. The report complies with the recommendations in Finance Norway's 'Roadmap for green competitiveness in the financial sector,' which describes how the financial sector can contribute to making Norway a low-emissions society.

In 2018, the Board adopted sustainability goals for the areas Gjensidige deemed to be of greatest significance to Gjensidige and the Company's stakeholders:

- Reduce carbon intensity
- Socially responsible investments
- A safer society



Chapter 2 on page 23 describes the risk and materiality assessment, and Chapter 5 on page 28 sets out the grounds for our focus areas and the status of measures. The focus areas fall under three overriding categories: climate and the environment, social factors and business governance.

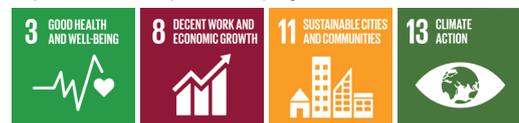
Climate change and environmental challenges are a high priority, and Gjensidige has set ambitious and clear goals for our contribution to reducing greenhouse gas emissions (carbon intensity), both directly and indirectly through loss prevention, our claims settlements and our own emissions.

Social factors: All aspects of our activities shall be based on respect for human rights and employees' right to meaningful work under safe conditions. We will further develop an organisation in which diversity characterises our activities and generates new ideas and perspectives in the work on a more sustainable society.

It is also important to Gjensidige to contribute to a safer society, apart from its role as an insurance company, and collaborates with non-profit organisations and the Gjensidige Foundation. Our commitment aims to contribute to a warmer society, ensure integration in the labour market and that children and young people have equal opportunities.

Good business governance is decisive for the Board and the management. Corporate governance is described in a separate chapter in the annual report on page 50–55. Socially responsible investments (SRI), data protection (GDPR), corruption and money laundering, and our Code of Conduct are particularly relevant to sustainability. Certain policies adopted by the Board are available at gjensidige.no. Other policies relevant to our sustainability work are set out in Chapter 5.7 on page 42.

The Board believes that Gjensidige's ambitions and measures will help to promote four of the 17 UN Sustainable Development Goals in particular. This is explained in Chapter 4 on page 27.



Definition

Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.
(Citation: UN)

Gjensidige's ambitions, measures and goals are described in more detail in Chapter 5 on page 28 of this report, where we also describe which of the UN Sustainable Development Goals our measures contribute to.

2. Gjensidige's work on sustainability

Sustainability and insurance go hand in hand.

Gjensidige has been creating value for society for more than 200 years by engaging in the lives of people and enterprises before and after claims arise. Based on our long experience, we have gathered knowledge about what causes losses, and how they can be avoided.

Our role in society

It is Gjensidige's ambition to be the most customer-oriented general insurance company in the Nordic countries and the Baltic states. Customer orientation permeates our behaviour, priorities and communication at all levels of the organisation. The focus on customers is key throughout the value chain, from product and service development via the training of employees, advisory services, sales, claims settlement and the handling of complaints.

Climate and environmental issues are becoming increasingly important to all our stakeholders. Sustainability is therefore an integral component of our strategy.

Sustainability is about striking a balance between what is good for the climate and environment, social factors and the economy. We use this definition actively in our work on integrating sustainability throughout the organisation. Our internal processes shall maintain a high ethical standard.

We must apply new thinking, and involve customers, employees and suppliers in the further development of our sustainable solutions. We are already well under way, and this will be a feature of our work going forward.

Customer satisfaction

Satisfied customers and good risk assessments are decisive for value creation in the short and long term. Satisfaction with the Company and our individual advisers is measured on a continuous basis, and improvement measures are initiated based on feedback from the customers.

Gjensidige has defined clear goals for customer satisfaction. The level of goal attainment influences the payment of bonuses to executive personnel and collective bonuses to all employees. The following results were achieved in 2018:

- In 2018, Gjensidige's customer satisfaction index (KTI) was 78.1 at group level, which is an increase of 0.2 from 2017, and the best result we have ever achieved.
- Voted the most sustainable insurance company in Norway by Sustainable Brands.
- BearingPoint assessed the digital maturity of 78 Norwegian companies, and Gjensidige emerged as the most digital insurance company (Digital Leaders Studies).

It is Gjensidige's ambition that all customers shall receive the right claims settlement as soon as possible. Both factors are important to their perception of quality.

The customers' possibility of obtaining efficient but thorough complaints handling is important to ensure high-quality claims settlement. Gjensidige has established a complaints system whereby customer complaints can be considered at three levels. This is intended to ensure that customers' complaints are assessed independently and thoroughly. We have commented on the status of this in Chapter 5.7 on page 42.

Stakeholder analysis

By stakeholder is meant those who influence the Company or who are influenced by the Company. In line with the recommendation made by Oslo Børs on the reporting of corporate social responsibility, a thorough stakeholder analysis was conducted in 2016. It is updated every year. Investors/owners, customers, employees, suppliers and society at large are our most important stakeholders. We engage in dialogue with our stakeholders as necessary. We have illustrated the arenas for and topics of our dialogue with different stakeholders in the figure on next page.

Investors/owners
 We communicate with our investors/owners in different arenas, and enable them to make informed decisions.

- Investor meetings
- Interim presentations
- Annual reports
- Website
- Analysts and capital market days

Customers
 Dialogue with our customers is an important means of reaching our ambition to become the most customer-oriented general insurance company in the Nordic countries. We communicate with our customers through

- Relevant products/services
- Digital solutions
- Loss prevention
- Efficient claims settlements

Suppliers
 Good cooperation with our suppliers is decisive if we are to reach our sustainability goals. Compliance with our procurement policy is critical to our goal attainment

- Renewable energy
- Waste handling
- Reuse
- Corruption/money laundering
- Fair competition
- HSE

Employees
 Engaged and motivated employees are important to our profitability, and we have different forums that give us an insight into ideas and concerns

- Labour rights
- Competence development
- HSE
- Protection of privacy
- Diversity
- Employee surveys

Society at large
 Insurance is an important social benefit and significant factor in safeguarding life, health and assets. We safeguard the interests of society through:

- Loss prevention
- Environmental and climate measures
- Socially responsible capital management
- Protection of privacy
- Anti-corruption and money laundering
- Sponsorship and donations

Risk and materiality assessment for Gjensidige's stakeholders

The assessment of relevant topics is based on

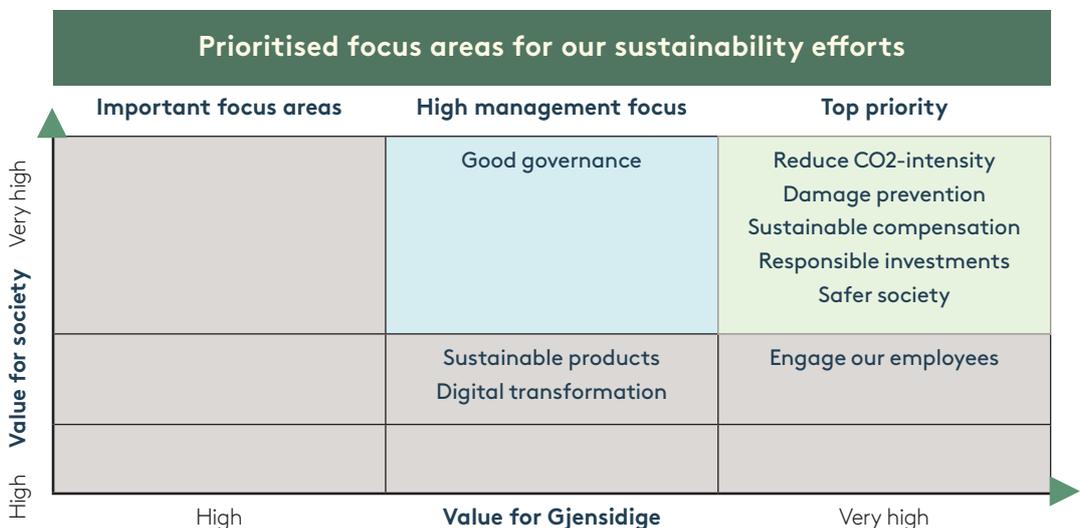
- what topics the stakeholders consider important
- the consequences for Gjensidige if we fail to meet stakeholder expectations

- digital transformation
- socially responsible investments
- good risk management
- own climate footprint
- engaged employees
- a safer society

The Board has assessed nine topics as being relevant to the Company's stakeholders: (see Chapter 5 on page 28 for more information about the grounds)

- sustainable claims settlements
- loss-reducing measures
- sustainable products

The results of the risk and materiality assessment have been compiled in a table, where topics of great significance to both stakeholders and Gjensidige are placed in the top right-hand corner. Topics that are less important to Gjensidige and the stakeholders are placed in the bottom left-hand corner.



3. Gjensidige's sustainability risk management process

Insurance is a collective financial arrangement whereby those with insurance receive help when a loss arises. Sustainable solutions are a precondition for longterm value creation and a cornerstone of Gjensidige's strategy, and it shall permeate everything we do. Good risk management is the core of our business.

Overriding management

Gjensidige will help to ensure that we, our partners and customers work to reach the environmental and climate goals of the Paris Agreement. The expected increase in the scope of natural disasters as a result of environmental and climate change affects our activities, such as the development of products, financial planning, pricing, rebuilding and loss prevention measures. Environmental and climate change affects risk assessments and the pricing of insurance. For example, we continuously assess the effects of extreme weather and changes in risk exposure, based on experience, expert assessments and prognoses.

Good risk selection and the right pricing is decisive for financial strength and profitability. The Board adopts risk management and internal control requirements in Gjensidige, and defines fundamental principles, processes, roles and responsibilities through the 'Group policy for risk management and internal control'. The management shall ensure that governing documents exist that underpin and supplement these requirements.

The policy makes requirements of the risk management system, which is intended to ensure that the Group's risk profile is within the limits adopted by the Board at all times. Risk is categorised as:

- Business and strategic risk
- Insurance risk
- Financial risk
- Operational risk and compliance risk

The Board receives quarterly reports on the status and development of risk, capital and compliance for the Group. Among other things, the report addresses developments in the most important areas of risk, and measurements and assessments in relation to the adopted risk limits.

The transfer of risk forms the core of insurance. Gjensidige's underwriting policy sets out the overriding limits and principles for insurance risk. The underwriting policy is intended to provide the Company with an over-

view and control of its risk exposure. It is also intended to ensure that the Company complies with applicable laws and regulations, and that it acts in a way that is generally perceived as fair and reasonable, and that is in line with Gjensidige's guidelines for ethical business operations. The underwriting policy explicitly states, for example, that the Company shall not enter into insurance contracts that form the basis for the payment of claims or other benefits to states or geographical areas subject to sanctions adopted by the UN or the EU.

Gjensidige uses a partial internal model approved by the Financial Supervisory Authority of Norway for the calculation of risk and capital requirements. The model takes, among other things, weather and climate related losses into consideration. The data that forms the basis for the model is updated annually together with assessments of the effects of climate and weather-related events on the scope of losses.

Risk description

Emerging risks:

The risk picture is complex and constantly changing. Emerging risk is potential new or changed risks that generally develop over time, often as a result of changes in climate, the political situation or technology. Since 2009, Gjensidige has had a separate emerging risk process. Its main objective is to identify and monitor these types of potential emerging risks and the possible consequences for the Company, so that the necessary measures and adjustments can be implemented at an early stage. The assessment of emerging risks is based on internal assessment and on various external sources. The emerging risks given priority in Gjensidige in 2018 were:

- Extreme weather and climate change
- Artificial intelligence
- Nanotechnology
- Synthetic biology

Extreme weather and climate change have been included in Gjensidige's emerging risk report since 2009. Wind and flooding are considered the biggest risks for Gjensidige. Gjensidige's internal model is used to assess its potential exposure to these types of events, and to other natural and weather events.

Artificial intelligence (AI) is computer systems that are capable of solving problems by learning from their own experience. The use of AI presents opportunities for rationalising processes and changing interaction with customers.

Nanotechnology is an emerging technology that presents new business opportunities and new risks. For example, nanotechnology makes it possible to create materials with new and unique properties. This can potentially change the risk picture, in certain product areas in particular.

Synthetic biology is the construction of biological components and systems that do not exist in nature, and the simulation of existing biological elements. Technology for growing cells and tissue in laboratories and tailoring them to specific purposes opens up new possibilities in the prevention and treatment of diseases and injuries. This may affect mortality, life expectancy and treatment needs, and could significantly impact the financial aspects of life and health insurance.

These areas may have a significant effect on the insurance market going forward, creating both risks and opportunities. They are included in strategic discussions, with respect to reassurance assessments, strengthened UW analyses, and to see what is insurable in the time ahead.

Climate-related threats, opportunities and risk

The climate and environment are affected by the customer's choice of house, car and behaviour, among other things. Gjensidige rewards a number of security measures by giving a discount on the insurance premium. Measures that contribute to reducing the risk for both us and customers include warnings of weather events, burglar alarms, inspections of electrical systems in buildings, the installation of equipment that reduces the risk of water damage in buildings, and tracking systems for cars.

The insurance premium paid by our customers is affected by the risk of loss. The assets we insure, such as cars, buildings and companies, will contribute to climate and environmental challenges to a varying extent. Sensible risk-pricing will contribute to a favourable environmental profile.

We define sustainability risk as factors with potential consequences for the climate and environment or socio-economic consequences. Work is now underway to incorporate sustainability risk, even more than before, into our insurance policies.

Risk management measures

Our stakeholders are increasingly keen to see what contribution Gjensidige makes to achieving the goals

of the UN SDGs and the Paris Agreement. This can affect our business, our customers and the society we are part of in the short and long term.

By their nature, losses have a negative impact on the environment, since resources are needed to repair the damage or replace the loss. Gjensidige therefore has a strong focus on loss prevention work, and thus helps to prevent claim events and reduce the impact on the environment.

Measures to boost robustness in relevant scenarios

- Help to increase knowledge of insurance claims data and climate consequences by sharing claims data relating to weather events.
- Use our expertise and actively cooperate with public bodies to ensure the environmentally friendly development of cities and the country as a whole.
- In cooperation with Finance Norway, share insurance claims data relating to weather events, so that a joint Norwegian database can be established to help municipalities plan developments and regulations.

Physical measures to handle physical climate risk

- Gjensidige already notifies customers if bad weather is forecast that entails a risk to life, health and assets.
- Implement loss-reducing measures such as deployment of flood protection equipment in the event of a risk of flooding.

Other measures to handle risk

- By means of a Risk Management concept, we will establish an index that shows how our customer portfolio is developing with respect to risk level.
- We shall strengthen our position earlier in the value chain by helping and encouraging our customers to make sustainable low-risk choices, e.g. in connection with the construction of new buildings. This means lower insurance premiums for our customers and favourable consequences for the environment, customers and us.
- We will continue to take a critical approach to entering new customer contracts so that we secure a more sustainable low-risk customer portfolio. The Risk Management report that we have developed differentiates customer feedback based on the challenges and improvement potential of each individual customer. By sharing

our knowledge of loss prevention work, we enable our customers to implement the sustainability measures required to achieve the best terms. The risk management score shall be high, and it shall be synonymous with a sustainable customer portfolio.

- We shall acquire more knowledge of the climate and environmental consequences, to ensure that our customer dialogue creates confidence in the market and that we are perceived as the most sustainable insurance company.

Objectives and methods

On our Capital Market Day, we communicated our ambition to reduce our own and claims-related carbon intensity, relative to earned premiums, year by year¹. We will work on finalising the method for achieving break-even and establish a reliable means of measuring and reporting status in 2019.

We would like to initially assess different initiatives to boost the circular economy, e.g. more repairs, reuse, reduce waste and different measures for reducing transport costs and promoting more climate and environmentally friendly reconstruction.

4. How Gjensidige's objectives and strategy contribute to the UN Sustainable Development Goals

The 17 UN Sustainable Development Goals (SDGs), and the 169 targets are ambitious and call for a global effort to make the world a better place, focusing on the climate and the environment, social conditions and the economy. Through its activities, Gjensidige shall implement measures that promote the UN SDGs, and have a particular focus on the goals that are most relevant to an insurance company.

Gjensidige's activities shall promote four UN Sustainable Development Goals in particular, which are the SDGs that concern Good health; Decent work and economic growth; Sustainable cities and communities; and Climate action.

A brief review of the UN SDG targets that are particularly relevant to Gjensidige follow below, and how we shall strive to ensure they are met.

A more detailed description of which of Gjensidige's sustainability focus areas support the UN SDGs is presented in Chapter 5 on page 28.

3 GOOD HEALTH AND WELL-BEING



3 Good health; targets: 3.6 and 3.8

Gjensidige shall help to halve the number of deaths and injuries caused by road traffic accidents.

Gjensidige shall also help to achieve financial risk protection, and universal access to quality essential healthcare services.

8 DECENT WORK AND ECONOMIC GROWTH



8 Decent work and economic growth; targets: 8.2, 8.3, 8.4 and 8.8

Gjensidige insures enterprises that are vital to establishing workplaces, entrepreneurship, creativity and innovation, and stimulates the establishment new enterprises and growth of existing companies, including through access to financial services.

Gjensidige is concerned with greater facilitation of the circular economy, and its goal towards 2030 is to progressively improve global resource efficiency in consumption and production, and endeavour to increase awareness of the need for a circular economy, in accordance with the 10-year framework of programmes on sustainable consumption and production.

Gjensidige endeavours to ensure that employees and partners respect labour rights and promote safe and secure working environments for all workers, including migrant workers, and those in precarious employment.

11 SUSTAINABLE CITIES AND COMMUNITIES



11 Sustainable cities and communities; targets: 11.5, 11a, and 11b

Gjensidige shall by 2030 significantly reduce the number of deaths and the number of people affected by disasters, including water-related disasters, and help to reduce the direct economic losses relative to global gross domestic product that follow from such disasters.

Gjensidige shall support positive economic, social and environmental links between urban, periurban and rural areas by strengthening national and regional development planning. Gjensidige shall also support adaptation to climate change, resilience to disasters, and develop and implement holistic and comprehensive disaster risk management at all levels.

13 CLIMATE ACTION



13 Climate action; targets: 13.1, 13.2 and 13.3

Gjensidige shall strengthen resilience and adaptive capacity to climate-related hazards and natural disasters, including providing insurance claims data to the authorities to ensure better measures are instigated to combat climate change and planning at the national level. Gjensidige shall work on loss-reducing measures that strengthen individual and institutional capacity on climate change mitigation and early warning, and strengthen their knowledge of and raise awareness about the climate.

¹ Given a Combined Ratio within the stipulated range, which reflects normal claims years.

5. The focus areas for Gjensidige's sustainability work

We have set goals for our sustainability work, and initiate measures in all of the areas we believe are significant for reaching the goal. The following areas are designated as important to Gjensidige's work on the environment and climate, social factors and business governance, based on the materiality analysis.

SDG = The UN Sustainable Development Goals

Gjensidige's focus areas	SDG	Sustainability goal	Status of measures
Reduce carbon intensity			
<p>Sustainable claims settlements</p> <p>Our purchasing policy applies to the whole Group, and requires that deliveries are sustainable. We use our purchasing power to exert influence, and, in continuous dialogue with our most important suppliers, we ensure that sustainable solutions are chosen.</p>		<p>Gjensidige shall help to reduce our customers' climate footprint. Our claims settlements shall be sustainable by 2030. We will achieve this by means of concrete measures, dialogue with customers and by supporting a circular economy.</p>	<p>What we have achieved:</p> <ul style="list-style-type: none"> • Circular economy established in our building and motor claims processes in Norway, Sweden and Denmark <p>New measures</p> <ul style="list-style-type: none"> • Establish a break-even point for carbon emissions and contribute to reducing carbon emissions. • Establish better follow-up of our suppliers' sustainability <p>Read more in Chapter 5.1 on page 31</p>
<p>Loss-reducing measures</p> <p>Loss-reducing measures have always been a key element of our corporate social responsibility. Providing guidance to customers is the mainstay of our customer dialogue, and we will help customers to reduce their risk of loss.</p>		<p>By providing advice to our customers and society at large, we shall help to increase their knowledge of sustainability.</p> <ul style="list-style-type: none"> • Requirements made of customers in the private and commercial markets to be entitled to discounts. • Contribute to at least 1,000 media reports on loss prevention per year. 	<p>What we have achieved:</p> <ul style="list-style-type: none"> • Our loss prevention work is showing good effect in agriculture. <p>New measures</p> <ul style="list-style-type: none"> • Further develop our concept 'the Gjensidige Experience' to enable our customer advisers to give good, sustainable advice. • Start-up of project to analyse the effect of risk checks for our commercial customers. <p>Read more in Chapter 5.2 on page 32</p>
<p>Reduce our own climate footprint</p> <p>Insurance is a knowledge business that does not directly affect the environment to any extent, however we can help achieve a more sustainable society by reducing our own 'climate footprint', and use our market power in relation to our suppliers and in our investments.</p>		<p>We shall keep reducing our climate footprint, and aim to become a climate neutral business by 2030.</p>	<p>What we have achieved:</p> <ul style="list-style-type: none"> • Part of the environmental certification scheme run by the Eco-Lighthouse Foundation. • Report our emissions to the Carbon Disclosure Project (CDP). <p>New measures</p> <ul style="list-style-type: none"> • Reduce the strain on employees and the load on the environment by reducing travel, and further facilitate new communication channels to reduce travel needs. <p>Read more in Chapter 5.3 on page 33</p>

Gjensidige's focus areas	SDG	Sustainability goal	Status of measures
Socially responsible investments			
<p>Socially responsible investments</p> <p>Gjensidige reserves considerable funds to secure payouts to customers who experience losses. Our investment strategy requires the business to be sustainable and is followed up continuously.</p>	  	<p>All investments shall, as far as practically possible, be screened for breaches of our SRI policy, which is based on the UN Global Compact principles and the Inhumane Weapons Convention. All breaches must be followed up.</p> <p>All external fund managers must recognise the importance of the UN SDGs, and have a strategy for how they as fund managers can work to achieve one or more of these goals.</p>	<p>What we have achieved:</p> <ul style="list-style-type: none"> • More dialogue with external fund managers on ESG. • Investors sign up to CDP. • Implemented ESG assessments in all internal credit analyses. <p>New measures</p> <ul style="list-style-type: none"> • Greater focus on external fund managers' strategies for implementing the UN SDGs. <p>Read more in Chapter 5.4 on page 34</p>
A safer society			
<p>Engaged employees</p> <p>We wish to develop an organisation in which diversity characterises our activities and generates new ideas and perspectives in the work on a more sustainable society. We want our employees to be engaged and motivated, and we encourage them to give feedback on what works well and what areas could be improved in our annual employee satisfaction survey.</p>	 	<p>Further develop our culture for building expertise and generating new ideas and perspectives, to ensure our employees are also relevant in the future.</p> <p>Have engaged and motivated employees and achieve top quartile results in the employee satisfaction survey.</p>	<p>What we have achieved:</p> <ul style="list-style-type: none"> • Competence building for employees. 5,982 course days in 2018. • 75 per cent job satisfaction (95 per cent response rate), higher than the average for the industry in the Nordic countries. • Ranked by Equileap. Best gender balance in Norway. • Ranked by ShelIndex. Third best of 25 listed companies on Oslo Børs. <p>New measures</p> <ul style="list-style-type: none"> • Cooperation established with BI Norwegian Business School. • Cooperation established with Seema, with a focus on diversity and diversity management. <p>Read more in Chapter 5.5 on page 36</p>
<p>Sustainable products</p> <p>We monitor the market and wish to offer sustainable products. We develop new products and services that will help change behaviour, and thus reduce greenhouse gas emissions through, among other things, cooperation with our partners.</p>	 	<p>By the end of 2025, we shall have made it possible for customers to make sustainable choices within the established product areas, motor vehicles, property, leisure, and accident and health.</p>	<p>What we have achieved:</p> <ul style="list-style-type: none"> • We have a broad range of products that directly and indirectly have a climate/ environmental profile included in the terms. <p>New measures</p> <ul style="list-style-type: none"> • Develop more green products. • Enable the customer to make sustainable choices, based on better information about terms and consequences. <p>Read more in Chapter 5.6 on page 41</p>

Gjensidige's focus areas	SDG	Sustainability goal	Status of measures
A safer society			
<p>Digital transformation</p> <p>Digitalisation provides new opportunities and threats. The sharing economy, blockchain and synthetic biology are examples of areas where technology will affect the environment, health and sustainable cities. We are keen to use new technologies in our work on a more sustainable customer dialogue and new products.</p>		<p>Establish market-leading digital advisory and support services that ensure efficient customer services and provide information about sustainable solutions for our customers in all countries we operate in by 2025.</p> <p>Ninetyfive per cent of our customers shall be 'paperless' by 2025.</p>	<p>What we have achieved:</p> <ul style="list-style-type: none"> Gjensidige voted the best digital insurance company in a survey carried out by BearingPoint in 2018. The percentage of 'paperless' customers was 73 per cent at the end of 2018. <p>New measures</p> <ul style="list-style-type: none"> Further develop our digital solutions pursuant to diversity and universal design requirements. Further develop our digital advisory services to ensure efficient customer service. <p>Read more in Chapter 5.7 on page 42</p>
<p>A safer society – social commitment</p> <p>For many years, Gjensidige has collaborated with various non-profit organisations and sports associations to contribute to a safer society.</p>		<p>We collaborate with non-profit organisations in all the countries we operate in to contribute to:</p> <ul style="list-style-type: none"> a warmer society provide work experience and contribute to the expedient integration of at least four full-time equivalents/persons per year ensure children and young people have equal opportunities 	<p>What we have achieved:</p> <ul style="list-style-type: none"> Helped ensure that disadvantaged people in all the countries in which we operate have received assistance, meals, Christmas presents etc. Established a collaboration with the Church City Mission, including an initiative to provide work experience for refugees. Sports sponsor – handball, athletics and swimming. <p>New measures</p> <ul style="list-style-type: none"> Establish cooperation agreements in Sweden and Denmark, and the Baltic states. Further develop sponsorship agreements with sports associations to give disadvantaged children and young people the opportunity to take part in activities. <p>Read more in Chapter 5.8 on page 43</p>
<p>Good business governance</p> <p>We are concerned with good risk management because it is essential to an insurance company. It affects everything from product pricing assessment to capital needs. We have established an internal control system that facilitates compliance with laws and regulations. We have a particular focus on data protection compliance (GDPR), corruption and money laundering, and our Code of Conduct.</p>		<p>Our business shall be characterised by propriety and reliability, with effective risk management and good internal control, which also improves products, services and processes. In addition to complying with external and internal rules, decisions and actions shall also be in line with Gjensidige's values and Code of Conduct, in a manner that creates and preserves value for customers, owners, employees and society at large.</p>	<p>What we have achieved:</p> <ul style="list-style-type: none"> The Financial Services Complaints Board received 297 complaints from Gjensidige customers in the first nine months of 2018, and in 18 per cent of the cases, it found in favour of the customers. S&P strong ERM rating. <p>New measures</p> <ul style="list-style-type: none"> Consider joining the Global Reporting Initiative (2-5 years). <p>Read more in Chapter 5.9 on page 44</p>

5.1 Sustainable claims settlements

What we do

All procurements over a certain size must be quality-assured by the Corporate Procurement department. Most purchasing agreements are the result of competitive tendering carried out in accordance with adopted guidelines.

All our suppliers must sign a self-declaration on corporate social responsibility. By signing this declaration, they undertake to:

- Conduct their business in a way that does not violate internationally recognised principles and guidelines relating to human and labour rights.
- Ensure that manufacturers and sub-suppliers of goods and/or services to Gjensidige do not violate internationally recognised principles and guidelines relating to human and labour rights.
- Ensure that products delivered to Gjensidige are of high environmental quality.

All procurements shall be as environmentally effective as possible, meaning that they shall seek to achieve maximum value creation and minimum environmental harm. Suppliers are, to the extent possible, encouraged to make environmentally friendly choices. This applies to all the countries we operate in.

There is a greater focus on the circular economy in our claims settlement. This applies to both buildings and motor vehicles. Reuse must never be at the expense of quality and safety, and we make stringent environmental and quality requirements in relation to the choice of materials. This is because quality is sustainable.

Companies that provide services in connection with claims payments for damaged buildings in Norway must be certified in Startbank. Startbank is a register of suppliers that is used by purchasers in the fields of building, construction, public administration, insurance and real estate. This ensures that qualified suppliers are law-abiding and that competition takes place on equal terms.

All material procurements are ordered electronically. As far as possible, all suppliers shall use electronic invoicing. Documents relating to invitations to tender, negotiations and agreements are stored electronically. Competitive tender procedures are carried out with the help of online portals. The use of electronic tools ensures that all processes

are documented and verifiable, and this prevents irregularities.

Environmentally friendly building and household contents insurance

When a loss is reported, we make sure that our customers feel safe and well-informed about the choices we recommend. Gjensidige also has extensive networks of local assessors in every country, who help to assess the scope of damage. In the work on repairing the damage or replacing the loss, materials are chosen based on social factors, the environment and financial durability. Local assessors, as well as using photos and robot assessment, also mean there is less need to travel, both for customers and assessors.

Gjensidige cooperates with other insurance companies in industry organisations to find, new, sustainable solutions for repairing wet rooms in a manner that is best for the customer and the environment, including by reducing waste and transport.

In Sweden, we cooperate with Godsinlösen (GIAB). GIAB works on the circular economy, by collecting damaged items from insurance companies and repairing them, thus contributing to reuse. This enables us to contribute to increasing durability and saving the environment.

Environmentally friendly motor insurance

Repairing damage to and covering losses for cars and other vehicles represent a large percentage of Gjensidige's claims costs. This is an area in which we can influence and achieve sustainable solutions. The circular economy in the form of more repairs and the reuse of car parts is a topic in every country we operate in. Gjensidige is participating in a pilot project under the auspices of Finance Norway Insurance services and Norske Biloppsamleres Forening to test the availability of used parts and prices. The purpose of the pilot is to:

- reduce the number of vehicles that are written off by lowering the costs of repairs by utilising used parts
- contribute to increased employment in garages
- reduce the costs of spare parts by using used parts rather than new parts where expedient (Norway has Europe's most expensive parts and the lowest reuse percentage of used parts)
- promote greater environmental responsibility by reusing used car parts

A final evaluation will be carried out in January 2019.

The practice of using used parts is more common in Sweden where the conditions are different; people have a different relationship to cars (cheaper to buy), a better distribution network and all cars that are scrapped go to disassembly companies. Our supplier agreements stipulate that the garages must always endeavour to repair or find used parts before they order new parts. The calculation system CABAS is used to manage this process in Sweden. We have also reduced the use of loss assessment in Sweden, which helps to reduce transport costs.

We have a considerable focus on repairs and reusing car parts in Denmark. We have also selected partners who work on repairing damage to windscreens and car windows. This increases the percentage of repairs considerably, and reduces material consumption and transport costs.

Effect of our efforts

- Car parts are reused in 5 per cent of motor insurance claims in Norway, Sweden and Denmark.
- We have conducted safety audits of 5 suppliers.
- In 2018, we calculated claims expenses relating to climate-related losses (storms, flooding, unusually strong wind and unusually high precipitation) to total NOK 210.5 million.
- Our agricultural advisers have conducted more than 11,000 risk checks since 2015. As a result, we are now seeing a record low number of fires in farm buildings.
- We are now carrying out risk checks of new and existing customers in the Norwegian commercial market to uncover risk and encourage measures to improve safety.
- We do not insure coal-fired power plants.

New measures

- Establish better follow-up of our suppliers' sustainability, and thus measure the effect of the sustainability measures initiated going forward.
- Sustainable solutions are important criteria when choosing new suppliers.
- Rebuild private homes in a green manner following a claim, exceeding the minimum requirements.
- Commercial insurance incl. green-blue rebuilding. Example: Rebuild with a green roof and green-blue outdoor areas. This is particularly important in builtup areas as a means of creating natural paths for rain water.

5.2 Loss-reducing measures for our customers and society

What we do

Natural disaster claims

With the help of weather data, we send text messages to customers who are likely to be affected by bad weather. The messages are based on official weather data and our customer data, so that we avoid distributing false alarms. Every year, we receive feedback from grateful customers who have had time to secure their assets thanks to these messages.

We have increased flood preparedness by deploying pumping equipment in areas prone to flooding before the spring thaw. The intention is to reduce the risk of major losses, and to provide the quickest possible help to as many customers as possible affected by floods.

Road safety

Young drivers are especially at risk of being involved in accidents. Gjensidige therefore has several measures targeting this group. In Norway, we give an insurance discount to young people who have practised driving with an accompanying driver for a sufficient number of kilometres. When they reach the age of 23, customers who have driven claim-free for the past year or longer will receive a sum of money as a reward. The longer the claim-free period, the bigger the reward. We collaborate with the Norwegian Council for Road Safety (Trygg Trafikk) on awareness-raising campaigns in upper secondary schools several places in Norway. #ErDuSikker? is a traffic safety competition for upper secondary schools.

In 2018, Gjensidige collaborated with the reuse app Tise, and distributed fashionable 'watch me' slap wraps, where the focus was on getting young people to use reflective devices. We collaborate with other insurance companies on road safety through the industry organisation Finance Norway.

Gjensidige helps to improve road safety in Estonia by running an annual campaign to increase pedestrians' use of reflective devices, and in 2018, Gjensidige distributed 20,000 reflective vests in Latvia and Lithuania to increase pedestrians' visibility in traffic.

Fire prevention

Together with the Norwegian Fire Protection Association, the Directorate for Civil Protection and Emergency Planning (DSB) and local fire brigades, we organised Røykvarslerdagen – smoke detector

awareness day – on 1 December 2018. The goal of the campaign is to raise awareness about how important an early warning is in the event of fire. An important message is that people should change the batteries in their smoke detectors on a set date every year. Gjensidige makes essential contributions to the campaign by planning, making and funding information videos and other material, and through marketing, funding of batteries and participating in stands and home visits.

Various fire prevention measures are initiated in the Baltic states, including new customers receiving smoke detectors. In Latvia, Gjensidige is one of the sponsors of a fire safety conference focusing on commercial customers.

Gjensidige conducts risk checks of 3,500 agricultural customers every year, to identify faults etc. that may cause fires. Checking electrical systems using a heat-seeking camera is an important part of the risk check. Our experience shows that 7 of 10 fires are related to faults in electrical systems.

Every year, Gjensidige is represented on a number of councils, committees and boards that work on fire prevention, prevention of water damage and other initiatives for the benefit of Norwegian society.

In all the three Baltic countries, we are conducting 'safe home' campaigns in cooperation with the media and representatives of the fire service, the police, security companies and electricity companies. The purpose of the campaigns is to raise awareness of loss prevention and to prevent accidents, fires and burglaries.

Health

Gjensidige offers sustainable solutions by facilitating, and encouraging, better health. This improves life quality and prevents illnesses and injuries.

Effect of our efforts

- In 2018, we sent 566,117 weather warnings to customers (2017: 291,000).
- We have never registered so few fires among our agricultural customers.
- More than 6,500 pupils from 27 schools all over the country submitted contributions to the #ErDuSikker campaign in 2018.
- In 2018, we were awarded the title of most responsible company in Estonia in its 'Traffic Safety Awards'.

- 70,000 young people used the learner driving app when learning to drive.
- We are part of the Norwegian cooperation group for fire prevention in schools, which runs Brannvettskolen.no. This measure ensures that 20,000 children receive fire prevention training every year.

New measure

- Further develop our concept 'the Gjensidige Experience' to enable our customer advisers to give good, sustainable advice.
- Include sustainability in our risk assessments of customers to help them make climate-friendly choices.

5.3 Our own climate footprint

What we do

- Eco-Lighthouse
- Company cars
- Travel

Greenhouse gas emissions from our operations are extremely modest. We work continuously to further reduce our emissions, and we report our emissions to the Carbon Disclosure Project.

The use of electricity and district heating does not cause greenhouse gas emissions, which must therefore be calculated on the basis of an assumed energy mix. The production of hydropower does not cause emissions either. We have calculated that our operations in 2018 caused emissions of 4,754 tonnes of CO₂ equivalents, (scope 1 and 2), compared with 4,452 tonnes the year before. These figures are higher than prior years, due to a change in the calculation of emissions caused by electricity.

Certified Eco-Lighthouse

In order to ensure that we impact the environment as little as possible, all our 11 Norwegian offices that have more than 30 employees are certified Eco-Lighthouses. Eco-Lighthouse is a national environmental certification scheme run by the Eco-Lighthouse Foundation. The foundation was established by key organisations in the private and public sector.

The offices that are certified Eco-Lighthouses use an environmental management system for the handling and reduction of materials consumption, waste, energy consumption and transport. An annual environmental report is prepared for all these offices that documents the status of implemented

environmental measures and action plans for the coming year. Among other things, the report covers waste handling, energy consumption, procurements, paper consumption, transport and climate accounts. The offices must be recertified every three years. It is an extensive process that is carried out by an environmental team at the office in question in cooperation with an external adviser certified by the Eco-Lighthouse Foundation. In 2017, our offices Trondheim and Tønsberg were recertified.

Annual reporting and regular recertification ensure that our offices live up to the highest standards for environmentally friendly operations. At our Copenhagen office, systems and procedures for handling and sorting waste are approved by the City of Copenhagen's environmental authorities.

As a knowledge-based company, our direct emissions are largely related to the running of offices and to travel and transport.

We work systematically to reduce our impact on the natural environment by limiting our consumption of energy and the generation of various types of waste, such as paper, office supplies, electrical appliances and household waste.

The environmental measures focus on energy efficiency, reduced travel through increased use of video conferences, and responsible waste management with extensive separation at source.

Limited use of company cars

We have established a company car policy that entails that CO₂ emissions from company cars cannot exceed 130 grams per kilometre. At our head office, we have three electric cars that employees can use in connection with meetings and private errands, so that we reduce the use of taxis and private cars.

Effect of our efforts

- In 2018, the Group's energy consumption was 12,671 MWh. Most of our energy consumption is related to lighting, heating and computers. The energy carriers are electricity, which in Norway is almost exclusively based on hydropower; district heating, which is largely based on waste incineration; and fuel oil.

The consumption breaks down as follows:

- Electricity: 8,669 MWh
- District heating: 1,814 MWh
- Fuel oil: 19 MWh

Approximately 63 per cent of the electricity was consumed in Norway.

- Gjensidige did not cause illegal emissions or receive fines or other sanctions relating to the environment in 2018.

New measure

- Reduce business trips by increasing the use of technology such as video conferences, using trains where possible and borrowing electric cars.

5.4 Socially responsible investments

What we do

Gjensidige has endorsed the UN Global Compact. This is the framework that guides the assessments we make in relation to socially responsible investments and corporate social responsibility in the investment area. Gjensidige supports the Carbon Disclosure Projects' (CDP) work as an Investor Signatory in its endeavours to improve companies' reporting of their effect on the climate and the strategy they employ to reduce CO₂.

As a member of the Norwegian Forum for Responsible and Sustainable Investments (NORSIF), we support the work on developing and promoting sustainable investments as a dedicated field in Norway, and share experience and knowledge across the Norwegian finance community.

Gjensidige's asset management is based on the 10 UN Global Compact principles:

1. Businesses should support and respect the protection of internationally proclaimed human rights.
2. Businesses should make sure that they are not complicit in human rights abuses.
3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
4. Businesses should uphold the elimination of all forms of forced and compulsory labour.
5. Businesses should uphold the effective abolition of child labour.
6. Businesses should uphold the elimination of discrimination in respect of employment and occupation.
7. Businesses should support a precautionary approach to environmental challenges.

8. Businesses should undertake initiatives to promote greater environmental responsibility.
9. Businesses should encourage the development and diffusion of environmentally friendly technologies.
10. Businesses should work against corruption in all its forms, including extortion and bribery.

Our guidelines concern investments in shares, interest instruments, hedge funds and property; both direct investments and through external fund managers. In addition, asset management shall comply with international conventions on inhumane weapons.

The Group's Chief Investment Officer is responsible for ensuring compliance with the policy and guidelines. We have hired the recognised consultancy firm GES Investment Services to carry out an ethical screening of companies. GES analyses, together with information from other external sources, form the basis for the exclusion of and dialogue with companies in Gjensidige's investment universe.

One member of the capital management team is responsible for reviewing and compiling all information from the external consultants and other external sources in connection with preparation of Gjensidige's exclusion list. This employee draws up a recommendation to the Chief Investment Officer (CIO) and the Chief Risk Officer (CRO), who together make a final decision on whether to exclude companies or take them off the exclusion

list. Companies that commit serious or systematic violations of Gjensidige's ethical guidelines and fail to take satisfactory steps to correct their conduct shall be placed on the list of excluded companies.

When a company is excluded, we will make sure that the company is not part of any portfolios that we manage ourselves, either by not buying securities in the company or by selling any securities we own. Socially responsible management is always a topic when we hire external managers. We only enter into agreements with investment managers who have appropriate guidelines and a satisfactory investment history.

If excluded companies nonetheless appear in externally managed funds, we will ask the manager to explain the situation. Managers who are unable to provide a satisfactory explanation within a reasonable time or who fail to demonstrate willingness to satisfy Gjensidige's ethical guidelines criteria will not be given new investment mandates. Gjensidige's Chief Investment Officer decides in each case whether the violation is severe enough for existing investments to be terminated.

The work on socially responsible investments is summed up by the table below. The work carried out is in proportion to the percentage of our investments which largely entail following up external fund managers, bond investments in the match portfolio and real estate investments in Oslo Areal:

Direct investments			External fund managers
Equities	Bonds	Property	All asset classes
Negative screening based on own exclusion list.	Negative screening based on own exclusion list.	Uses the BREEAM NOR environmental classification system for new buildings and complete restorations.	Negative screening based on own exclusion list.
Active ownership. We endeavour to influence companies through dialogue where we consider it expedient.	ESG is a part of all credit analyses that form the basis for investments in corporate bonds, and in the ongoing dialogue with companies and the dialogue prior to share issues.	Through Oslo Areal, Gjensidige invests in environmental buildings and locations, in public transport hubs in particular.	Proponent for changing investment mandates and individual investments that are not in accordance with Gjensidige's SRI policy.

Effect of our efforts

In 2018, 15 companies were excluded from Gjensidige's investment portfolio, while 13 previously excluded companies were re-included, some as the result of mergers. At yearend, a total of 91 companies had been excluded. They break down as follows based on the reason for exclusion (a company can be excluded for several reasons):

Labour standards	Corruption	Human rights	The environment	Weapons
8	13	25	23	30

In 2018, we contacted ten external fund managers about 29 companies that were on our list of excluded companies. This dialogue led to a decision to sell a management mandate, a fund manager selling a particular company and a change in an investment. New investment mandates that do not comply with the current SRI policy cannot be entered into.

Work has been conducted throughout the year to include an ESG assessment in all internal credit analyses. The focus of this work has been on identifying ESG elements that influence our assessment of the credit risk. Governance is considered to be particularly important across companies.

Our real estate investments are made through the property company Oslo Areal, a company that engages in property development in the Oslo area and invests in environmentally friendly buildings near public transport hubs. The company uses the BREEAM NOR environmental classification system for new buildings and complete restorations. In 2018, the Company sold two properties without environmental certification and purchased two buildings in an environmental location beside a public transport hub, one of which is a new building certified pursuant to BREEAM NOR in the design and planning phase. The two new properties both have green roofs, and one of the buildings has a solar energy system. The Company was also awarded its first BREEAM-In-Use certification for Sørkedalsveien 6 in Oslo in 2018.

New measures

- Continuous efforts are made to improve existing processes and new measures in the area of socially responsible investments. We can exert the greatest influence through active dialogue on ESG criteria with our external fund managers, and incorporate ESG requirements in the mandates we establish. This dialogue will concern, as well as investments in individual companies and investment mandates, their exercise of ownership, reporting of their impact on the environment and other ESG perspectives in the underlying portfolio and their work on the UN Sustainable Development Goals. As illustrated, this work takes the form of setting criteria for and following up Gjensidige's direct investments and establishing requirements to be used by external fund managers and following up these mandates. Investments are considered on an ongoing basis that aim to an even greater extent to help solve the current climate challenges through infrastructure investments in renewable energy.
- Oslo Areal actively follows up the ten immediate measures of the property sector's roadmap towards 2050. Among other things, the Company has assessed uses for the properties' roofs. Relevant measures include bee hives and solar energy systems.

5.5 Engaged employees

What we do

Gjensidige shall be an attractive workplace that attracts engaged and motivated employees. In order to be able to give our customers the help they need, our employees undergo thorough training in ethics, data protection, information security, knowledge of our products and management training in our own school. This is intended to enable us to treat customers with trust and respect, provide professional and ethical advice based on necessary qualifications and knowledge of the customer's situation.

Diversity

The right competence in the right place at the right time is vital to maintaining competitiveness. It is important to Gjensidige to facilitate diversity. We look at alternative work methods that include diversity, and that also make it possible to work even more efficiently across the organisation. Our experience is that such work methods are perceived as enriching and generate new approaches and solutions to different problems.

Gender equality

Gjensidige has had a strong focus on gender balance and increasing the percentage of women in senior positions. There is zero tolerance for all forms of discrimination. Requirements relating to greater diversity are included in the senior management's Performance Agreements, and in the basis for the assessment of bonus. Diversity is followed up in the biannual People Review, which covers all members of the senior management.

Wage growth for women and men is continuously measured and followed up. Any unexplained differences identified receive special followup.

We have established a collaboration with Seema in 2018, which aims to increase the focus on and understanding of the importance of diversity and diversity management as a sustainable competitive advantage.

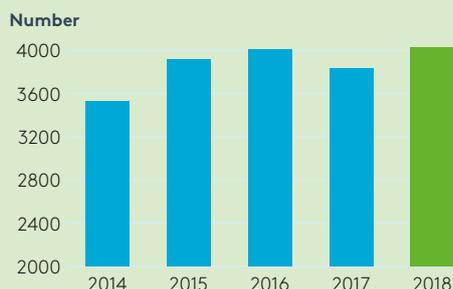
Notification

Reporting procedures are in place for employees who experience discrimination. Gjensidige has an equality and discrimination committee that convenes as necessary. The committee comprises staff from the HR department and employee representatives. It is the Group's HSE manager who decides when to convene the committee. The committee held one meeting in 2016, one in 2017 and one in 2018. The topic of these meetings was equal pay for women and men.

ILO and cooperation with employee representatives

All of our employees have full freedom of association. Collective bargaining takes place in accordance with the agreements with the different trade unions. Gjensidige recognizes the main ILO conventions, and supports the International Labour Organization's promotion of decent work based on social justice and internationally recognised labour rights.

Number of employees



The cooperation between the Company's management and the employees' trade unions is systematic and good, and it is based on a well-established structure with regular meetings of various committees. Rules have been adopted for what processes and decisions employee representatives shall be involved in. Employee representatives are paid by the Company. Under Norwegian law, employees of the Group are entitled to be represented on the Company's governing bodies. Employee representatives are elected by and from among the employees.

Definition of diversity

Diversity is defined as differences in employees':

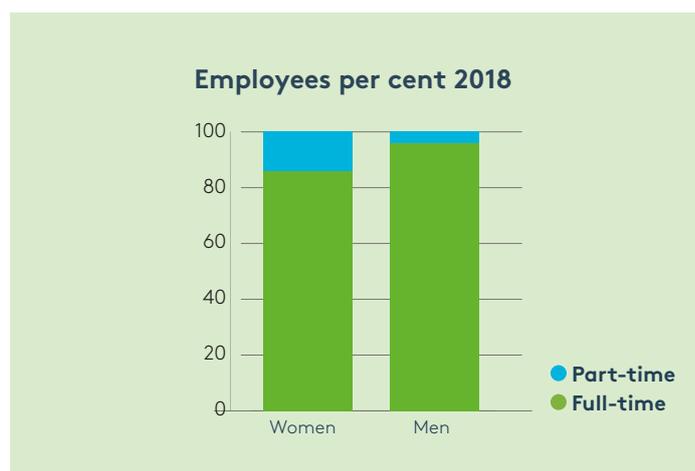
- gender
- age
- competence
- functional ability
- ethnic origin
- sexual orientation
- religion

The Company management maintains a close dialogue with employee representatives in connection with restructuring processes. The company shall attend to those who are affected in the best possible way. This concerns everything from decisions, information, finding alternative positions in the company, to offering assistance from external advisers and finding new jobs for those who are made redundant.

IW enterprise

Gjensidige shall be an inclusive workplace for all employees. We are an Inclusive Workplace (IW) enterprise and cooperate with the Norwegian Labour and Welfare Administration (NAV) on job training for people who, for various reasons, have been unemployed. NAV pays subsidies for employees who suffer from chronic illnesses but who still manage to work.

Gjensidige has a range of measures and a special programme for entities with a high level of sickness absence. Our 'Focus projects' have had a great impact, leading to reduced sickness absence and greater employee satisfaction. Gjensidige has measures in place that help to ensure that older employees can continue working until they reach retirement age. The measures vary between countries. Examples of measures include the possibility of reduced working hours and extra holidays.



All our big office buildings are universally designed in order to accommodate employees with disabilities.

Health, safety and the environment (HSE)

Systematic health, safety and environmental work is given high priority in Gjensidige. Our goal is not only to prevent sickness absence and injuries, but also to ensure that Gjensidige is a health-promoting workplace. We therefore work on preventing and following up sickness absence and on making adaptations for employees with disabilities.

The work stations of all new employees are inspected as soon as possible by a physiotherapist or an occupational therapist, if practically possible. The purpose of this is to adapt the work station to avoid repetitive strain injuries, and to provide information about the prevention of health problems.

Special adaptation procedures have been adopted for employees who have or wish to prevent such problems arising.

The HSE work is monitored through audits and followed up internally by employees with special responsibility for HSE. All incidents that can represent a risk must be reported in the Company's non-conformity system. In 2018, as the year before, three such audits were carried out in Norway, two in Denmark, and one in Sweden.

Working environment issues are integrated in the annual employee satisfaction survey that is conducted among all employees to identify matters that require special attention.

All managers review the survey with their staff in cooperation with the HR department. Each department defines an action plan that is followed up by the respective managers.

General measures that are intended to promote health and a good working environment include:

- Arrangements to facilitate cycling to work in the form of bicycle parking and changing rooms

- Gym rooms
- Short exercise breaks during working hours
- Company sports club that organises a range of activities

Competenceraising to meet the needs of the future

It is important to Gjensidige that everyone has the opportunity to develop in their job. We facilitate work across national borders in all the countries we operate in. This generates new perspectives, learning and a better result for our customers.

Gjensidige has a flat organisational structure and the Company believes that diversity and cooperation are important preconditions for building a good delivery culture and being attractive in the labour market of the future. We have implemented a development model that highlights that most learning – 70 per cent – takes place in connection with day-to-day tasks. The remaining 30 per cent comes from organised tuition and training.

Employees who work in sales and customer advice take part in an extensive course programme leading up to an exam that tests their professional knowhow, ethics and the customer dialogue. Advisers targeting the private market are certified in accordance with a national industry scheme for the sale of general insurance.

The Gjensidige Customer and Brand School ensures that all employees have the necessary prerequisites for implementing the Group's customer orientation strategy. The school's main focus areas are sales, claims settlement and management. It offers courses and programmes that underpin our group strategy and requirements for certification of customer advisers.

All new Gjensidige employees take part in an introduction day where the CEO and other key personnel talk about the Company's strategy, competence-building, culture, brand, ethics and more practical information.

Talent development

It is important to Gjensidige to attract and retain skilled employees. The People Review enables senior managers to follow up developments in the talent pool for experts and managers. Internal mobility is facilitated for the purpose of broadening the employees' range of competence and specialised knowledge.

We have also established an internal mentoring programme, as a supplement to the personal growth and development of individual employees and managers. The programme will help us to retain critical expertise, promote Gjensidige's culture and contribute to internal career development across divisions and business areas.

Customised management development programmes have been developed for groups of managers with different experience backgrounds, from newly appointed managers to the senior group management.

Gjensidige is highlighted as an attractive employer, both through digital channels and activities at relevant educational institutions, such as stands and presentations to students. In accordance with our employer branding strategy, we have established an internship scheme where students work for us for a whole academic year in order to gain relevant work experience. The work is intended to be relevant for their studies by putting theory into practice. Every year, we organise the Gjensidige Day at Gjensidige's head office, which offers a varied programme for students.

Cooperation with educational institutions

We have established a cooperation with BI Norwegian Business School, and sponsor their master's programme in Analytics. The cooperation between BI Norwegian Business School and our analytics environment is an important means of showing students the job opportunities that are available in Gjensidige and in the insurance sector in general.

We also run a management programme at the senior executive level in cooperation with the Norwegian School of Economics (NHH), the Administrative Research Unit AFF and HEC Paris.

HR analysis

It is important to Gjensidige to work in an analytical manner to secure a good factual basis for our HR-related decisions. An analytics team has therefore been established that cooperates with other analytics resources in the Group. In 2018, the analytics team has focused on the following topics:

Employee surveys

The Group's annual employee surveys provide important feedback on whether our employees are engaged and motivated in their work. All managers

receive feedback from their employees through a structured process. We see that it pays to involve individual employees in establishing measures that will help them to be happier at work.

A followup survey is conducted in addition to the main survey, if necessary, to see whether measures are effective. Special measures are implemented for entities that deviate significantly from the goal of employee engagement and job satisfaction. Work engagement is included in the followup of managers and the Performance Agreement for the senior group management.

HR reports

An HR report is prepared every quarter, showing the status of HR trends in gender balance, developments in wage disparities between women and men, the status of measures after the employee survey, turnover, sickness absence, the proportion of consultants and temporary staff. Work is now underway to ensure that measures are implemented to follow up competence goals.

People review

The Performance Agreement, which makes up part of the bonus evaluation, also measures senior managers' management and strategic staff planning prowess.

Effect of our efforts

- Employee satisfaction in 2018 shows a figure of 75 per cent, which is higher than the average for financial undertakings in Norway and the Nordic countries in all criteria.
- Equileap has ranked Gjensidige the best company in Norway in terms of gender balance, and 19th in the top 200 companies worldwide – up from number 40 in 2017.
- Gjensidige was fifth among the 60 biggest companies in Norway with respect to gender balance, according to EY's She index.
- Sickness absence was 4 per cent in the Group in 2018.
- Number of occupational injuries: 2.
- In 2018, 84 per cent of the Company's employees in Norway were covered by collective agreements. In Denmark, 80 per cent of our employees were covered by collective agreements, and in Sweden 100 per cent.
- In 2018, 100 per cent of our employees took a course on the GDPR.

- In 2018, we had 22 students in the internship scheme.
- Universum ranked Gjensidige Norway 's most attractive employer in the insurance industry in 2018.
- The Gjensidige Customer and Brand School had 5,982 course days in 2018 (6,960 course days in 2017).
- E-learning plays an increasingly important role in the school's programmes In 2018, 11,805 e-learning courses were completed and passed, compared to 7,927 i 2017.

New measures

- Integrate diversity management based on experience from the collaboration with Seema on diversity and diversity management, and assess the need to initiate measures to reduce covert discrimination.
- Follow-up to ensure that all employees have relevant development plans in place based on analyses of Gjensidige's needs.
- New training measures for employees relating to sustainability.
- Assess how we can include ESG in Performance Agreements.

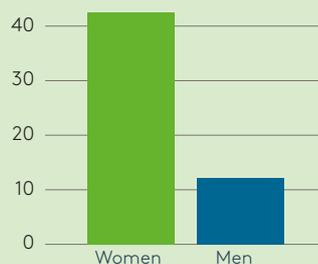
Employees as at 31.12.2018



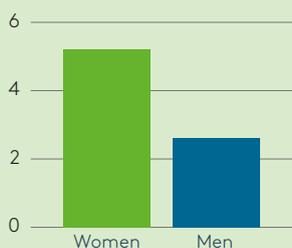
Average salary employees (NOK)

	Women	Men	Women's pay as share of men's pay
Group management	2,400,598	3,140,073	76.5%
Other managers	947,798	1,049,686	90.3%
Employees	526,925	601,987	87.5%
Total	571,981	680,373	84.1%

**Parental leave
Number of weeks 2018**



**Sickness absence in
per cent 2018**



**Absence with sick child 2018
Number of days**



5.6 Sustainable products

What we do

Active loss prevention and the provision of advice gives customers the incentive to prevent and limit losses. This is because it is more environmentally friendly to prevent and upgrade than to rebuild. Safety measures are rewarded by discounts being given when insurance is taken out.

Many sustainability elements are incorporated into the terms of our insurance policies, some of which are described below.

Property

Sustainable measures after claims events:

- Demolition and removal: Waste that after a claims event is harmful to the environment must be destroyed in an environmentally sound manner at Gjensidige's expense.
- Public orders/technical regulations: After a claims event, we cover the upgrade to the applicable technical regulations (less energy consumption, less risk of loss).
- Incentives in coverage that include faulty workmanship encourages the use of local, skilled and taxable labour. It also counteracts unnecessary repairs and social dumping.
- We cover alterations/facilitation for wheelchair users following accidents as standard in our home, cabin and household contents policies.
- Good 'comprehensive insurance' coverage for bikes and electric bikes in our most sold household contents policy.
- Covering repairs of smashed mobile phone screens promotes reuse rather than a use and throw mentality.

Motor vehicles

We have a number of initiatives to promote road safety, and we encourage safe and claim-free driving. Our bonus system rewards customers for safe and claim-free driving. We collaborate with other parties such as Trygg Trafikk in projects focusing on young people. Our liability insurance for motor bikes and cars covers the replacement of safety equipment such as helmets and child seats in the event of collisions.

- Gjensidige's learner driving app enables young people to log their driving practice, and it rewards extensive training.
- Under this agreement, young people receive a payout when they turn 23 if they have not incurred driving claims.

Environmentally friendly car loans

In cooperation with the Norwegian Automobile Federation (NAF), the member organisation for car owners, we have developed an environmentally friendly car loan for hybrid, hydrogen and electric cars. The loan is distributed by NAF and furnished by Gjensidige Bank.

Liability insurance

Customers are given incentives to secure their assets by preventing and limiting losses. We actively follow up sectors that file many liability claims, in order to reduce the number of claims in future. We require that they implement various safety measures before they can take out insurance, to encourage them to operate in a responsible manner. New products include:

- Gjensidige's environmental insurance covers more than ordinary liability insurance. It covers expenses in connection with preventing and limiting losses, and environmental compensation pursuant to the Nature Diversity Act, which is intended to safeguard nature, landscapes and biological diversity.
- Drone insurance: Drones can be used more to replace human labour, to enable society to run more efficiently. This also reduces the risk of harm to people in that drones can carry out different types of reconnaissance work, e.g. in connection with fires.

Insurance for farmed animals and plant cultures

The health of domestic animals and farmed animals in Norway is in a unique position, and we have the lowest use of antibiotics in Europe. The World Health Organization has highlighted antibiotic resistance as one of the most serious challenges facing the world's population. Limiting the use of antibiotics is an important health measure, which is supported by the insurance product.

Travel insurance

We have developed digital services with an online shop, online claims forms and digital proof of insurance. Ensuring customers' safety when they are travelling is important, and we offer advice on travel and illness in the Gjensidige app. We take advantage of reuse and repairs where expedient in settlement processes.

- Online doctor: Customers can have a video consultation with a doctor by means of an app on their mobile phone. This solution saves customers time and transport expenses.

Life and health insurance

Customers can use our services without necessarily having sustained a loss that warrants compensation. The services are available 24/7, and make day-to-day life easier for customers.

- School robot – AV1
- Online doctor
- Braive
- Phone line for children and young people, and the Helsetelefonen phone line

New measures

- Develop more green products (1–4 years).
- Make information about sustainable choices available.

5.7 Digital transformation

What we do

The continuous improvement of processes is vital to being customer-oriented and ensuring cost efficiency. Digitalisation offers many sustainable solutions that benefit our customers and society at large. The use of artificial intelligence is also considered to be one of our priority emerging risks, where we see both opportunities and threats.

We focus on making our services and products available in all digital channels. We have good processes for taking advantage of the opportunities digitalisation presents throughout the customer journey, from efficient CRM sales, digital marketing, digital product experiences, e-commerce, to mobile phones and social media.

Gjensidige has an efficient digital claims settlement process, which has a high rate of customer satisfaction. Gjensidige offers a range of digital services and digitalisation activities, including the following:

Research collaboration: In order to ensure that our products and customer service maintain a high international level at all times, we collaborate with research institutions on innovation. In the period from 2015 to 2022, we are participating in a research collaboration with, among others, the University of Oslo, the University of Bergen and the Norwegian Computing Centre on several projects that we expect to give us new insight into topics relating to the processing of large data volumes (big data). Examples include risk pricing, forecast and trend analyses and insurance fraud.

Sharing economy: Platforms that allow consumers and businesses to exchange goods and services without traditional intermediaries can represent a risk to our business model. We have therefore taken a closer look at the threats and opportunities that the sharing economy entails. In 2018 we cooperated with the car sharing-company Nabobil about insurance for cars rented through their service.

Paperless customers: We work continuously to increase the proportion of 'paperless' customers, meaning customers who choose to receive information from us through digital channels instead of on paper. With the exception of information that is required by law to be distributed on paper, paperless customers receive all documentation and other information by email, text messages or by logging into our web portal. Digital customer communication improves the customer experience and helps to reduce costs and paper consumption.

Digital diversity: All user groups should be able to benefit from the services we offer to the market. It should be easy to reach Gjensidige despite different preconditions and disabilities. We therefore work systematically on meeting the requirements set out in the WCAG 2.0 standard, which provides guidelines on the universal design of web content.

We offer our customers a range of digital services.

Effect of our efforts

- Gjensidige came out top as the most digital insurance company in the year's Digital Leaders study. The consultancy company BearingPoint assessed the digital maturity of 78 Norwegian companies.
- Percentage of digital customers – 73 per cent.
- Percentage of digital sales in 2018 is 16.9 per cent (Private Norway).
- Percentage of claims reported online in 2018 is 70 per cent (Private Norway).

New measures

- Further develop our digital advisory services to ensure efficient customer services and that our customers receive information about sustainable solutions.
- Gjensidige's ambition is to increase annual digital sales by 20 per cent by 2022.
- Gjensidige's goal is for 80 per cent of all claims to be reported via digital channels by 2022. Another goal is for 80 per cent of the claims to be processed automatically.

5.8 A safer society – social commitment

What we do

Collaborate with non-profit organisations

Gjensidige collaborates with the Church City Mission on creating a better and safer local community. This involves making a financial contribution to the Church City Mission, and various activities that engage our employees. In 2018, employees from several of our offices all over the country contributed to the Church City Mission's knitting campaign which it runs before Christmas every year. It aims to create 'a warmer society' by raising money for a Christmas celebration for disadvantaged people. In 2018, we held a gift-raising event where employees could donate used items in good condition to those in need, via the Church City Mission. Employees also participate in various activities under the auspices of the Church City Mission, including homework help and chess courses for children.

In Denmark, Gjensidige supports the Christmas Seal Homes foundation (Julemærkehjemmene), which helps children who are victims of bullying or isolation.

In Lithuania, we cooperate with the aid organisation Food Bank, which distributes food to the poor. Gjensidige provides free insurance, supports activities and encourages employees to take part in the distribution of food packages. In 2018, we funded food packages for 13,400 people, instead of giving our business associates Christmas presents. We are a member of the 'For a Safe Lithuania' campaign, the purpose of which is to give children from underprivileged families an increased sense of security and self-esteem. In Latvia, we are doing a tour of the biggest schools, teaching children about safety in the home. We sponsor and help to organise the Fire Safety Conference, which targets business and industry. In Estonia as well, we cooperate with the Food Bank on the distribution of food to the poor.

Gjensidige's social commitment in Norway must be seen in conjunction with the Gjensidige Foundation, our biggest owner. The Foundation makes substantial donations that are funded by the return on the capital that was freed up in connection with the stock exchange listing of Gjensidige Forsikring in 2010.

The Gjensidige Foundation aims to contribute to a safer society and is particularly concerned with preventive measures and activities for children and young people throughout Norway.

Sponsorships

Since 1991, we have been the main sponsor of the Norwegian women's national handball team. Since 2017, we have also been the main partner of the Norwegian Confederation of Sports (NIF) / Olympiatoppen and its 15 individual sports federations, and we have sponsorship agreements with the Norwegian Ice Hockey Association, the Norwegian Swimming Federation and the Norwegian Athletics Association.

We use our sponsorships to create activities for children and young people, so that we help to recruit new athletes and promote a healthier lifestyle. For the last few years, we have organised two projects called 'Minihåndballjentene' and 'Minihåndballgutta' that have been very popular. The projects target children between the ages of 9 and 12, and entail that a number of boys and girls are selected as mascots for the national handball teams. The national team members mentor their mascots throughout the year, and attend practice sessions with the mascot's teams. It is highly motivating for the children, and their parents, who often do voluntary work for the team, to meet top players this way. The age group was chosen because figures from the Handball Association show that many children drop out of the sport when they reach their early teens. The projects are considered an important contribution to the Handball Association seeing a rise in recruitment.

Effect of our efforts

- Instead of giving employees a Christmas present, we made a NOK 250,000 donation to Save the Children. The Company's employees decided which cause would receive the donation through a vote.
- Annual donations to the Church City Mission: NOK 300,000, and NOK 75,000 to the project 'i arbeid' and a further NOK 150,000 in connection with the year's TV Telethon.
- We gave NOK 100,000 to the Red Cross in connection with their 'Christmas relay race' in 2018.
- The Christmas Seal Homes foundation (Julemærke-hjemmene) helps around 750 children every year who are victims of bullying or isolation.
- The Gjensidige Foundation is deeply engaged in society and distributes around NOK 200 million every year to help to make society safer.
- Gjensidige helps to finance the public welfare system by paying direct and indirect taxes and pay to employees. Tax payable amounted to

NOK 1,282 million for the Group in 2018. A large amount in value added tax comes in addition. Pay and employee benefits amounted to NOK 2,982 million.

New measures

- Extend collaboration with voluntary/non-profit organisations to also include work experience, help to achieve a warmer society, and engage our employees in different activities involving children and young people.
- Use sponsorship agreements with sports associations to give more children and young people the opportunity to take part in activities.

5.9 Good business governance

What we do

- Emerging risks and risk management (see Chapter 3 on page 25)
- Data protection (GDPR)
- Insurance Distribution Directive (IDD)
- Customer complaints
- Anti-corruption
- Money laundering and financing of terrorism
- Notification channel

Data protection (GDPR)

Gjensidige processes personal data in accordance with the laws and regulations that regulate our collection, storage and use of such data. A group policy and instructions provide detailed requirements for the processing of personal data. Gjensidige's employees are bound by a statutory duty of secrecy about all matters relating to our customers. Data protection training is mandatory for all employees and is also a part of the introductory programme for new employees. Access to personal customer data shall only be granted to employees who need it in the course of their work. The Company shall not obtain other personal data than what it needs to serve the individual customer.

Personal data shall only be used and stored for as long as this is necessary, and must then be erased, unless special exemptions are authorised by law.

The respective EVPs have overriding responsibility for the processing of personal data and internal control relating thereto. Other managers are responsible for ensuring that employees who have access to personal data have the competence and other qualifications required to be able to comply with the regulations and protect the customer's personal data.

The data protection officers are an internal control function. They are in contact with the Norwegian Data Protection Authority, and with customers and employees who have queries concerning the processing of personal data.

Customers can request access to the information stored about them at any time, and they can demand that incorrect information be corrected. Requests for access may be rejected in special cases following a concrete assessment, for example in connection with the investigation of insurance fraud. Our privacy statement is available at gjensidige.no. It describes how we handle personal data.

Risk assessments relating to breaches of data protection regulations are carried out, as part of the Company's ordinary risk assessment process, to safeguard information security, among other things. A more detailed risk assessment (Data Privacy Impact Assessment – DPIA) is carried out if changes are made that are likely to affect security.

Insurance Distribution Directive (IDD)

The IDD safeguards consumer protection by, among other things, ensuring customers receive good information and that our customer advisers have the right expertise.

Ethical and customer-friendly business operations

Gjensidige shall have a corporate culture where each individual employee exercises good judgement. Our value creation shall take place in accordance with our ethical guidelines, which are set out in a number of policy documents that are adopted by the Board and managed by the EVP of Group Staff and General Services.

Our Code of Conduct describes our values and underlines that all our activities must stand up to public scrutiny. Together with other documents, the Code of Conduct describes what is acceptable conduct and requires all employees to behave in a respectful, considerate and generally polite manner in relation to colleagues, competitors, customers and others.

Our internal regulations include a prohibition against role conflicts that can prevent impartial conduct in relation to customers, suppliers, shareholders or other business connections.

The risk of criminal offences and violations of our Code of Conduct is monitored as part of our internal control system. The Board has chief responsibility for risk management and internal control, and the CEO is responsible for the implementation. Our most important risk areas and internal control are reviewed annually by the Board. Risk management and internal control are described in more detail on pages 47 and 76 and in Note 3.

Complaints handling

Gjensidige has established a complaints system whereby customer complaints can be considered at three levels.

1. The customer's case officer.
2. The customer ombudsman (the Company's internal complaints board). The customer ombudsman service is staffed by highly experienced claims settlement personnel, who can take a fresh look at the case without being influenced by the original case officer's personal assessment.
3. The third level is the Norwegian Financial Services Complaints Board (Finansklagenemnda), which is a joint complaints board for the whole insurance industry that comprises representatives of the consumer authorities, the financial industry and independent experts. Its composition ensures that independent representatives decide the outcome of cases in which the consumer authorities and the financial industry disagree.

Notification channel

Gjensidige shall have a low threshold for reporting unpleasant matters. Employees who wish to raise such matters can contact their manager, the HR department, their HSE manager, an employee representative or the safety delegate. Everyone has a duty to report criminal matters, or situations where life or health is at risk. A poster with instructions on procedures for whistleblowing is easily accessible on our intranet site.

We have established notification channels in all countries we operate in, apart from Sweden where the legislation is different and notification must take place through a manager. In Norway, whistleblowing is facilitated through two electronic mailboxes:

- An internal mailbox for reporting ethics-related matters
- An external mailbox for reporting irregularities and malpractices

Notifications addressed to the internal mailbox are dealt with by the Company's HR department based on clear procedures. Relevant matters are reported to the Group's risk committee and the Board.

Whistleblowers are protected by law and the Company's internal regulations, and employees who report such matters shall not be subjected to reprisals. Notifications addressed to the external mailbox are in principle anonymous, unless the whistleblower chooses to give their name. Employees may submit notifications to this mailbox anonymously, as may customers, suppliers and other external stakeholders. Notifications of irregularities or malpractices are dealt with by Gjensidige's Internal Investigation Unit. The department carries out a preliminary investigation or assessment based on the content of the notification. If the assessment uncovers matters that warrant criticism, the HR department will take over the case, assess it and decide which sanctions to impose. The CEO will decide whether to report employees to the police.

Anti-corruption

For Gjensidige, the risk of corruption will largely be related to the Company's sale of insurance and investment advice to the private and public sector, entering into agreements and the procurement of goods and services. Our definition of corruption follows the definition used in Norwegian law: abusing one's position to obtain an advantage for the company, oneself or others. The work on combating corruption requires clearly defined rules and active enforcement of the rules.

Gjensidige's internal regulations state that the Company has zero tolerance for corruption and anything resembling corruption. The regulations consist of instructions and a group policy adopted by the Board. The group policy for corporate social responsibility, the group policy on the Code of Conduct, the group policy on specific ethical guidelines relating to hospitality activities and guidelines on welfare measures, seminars and gifts are also relevant in this context.

Our employees are not allowed to offer or receive bribes or facilitation payments. The same applies to gifts that can be regarded as improper. The rules apply to managers and employees at all levels of the Company, also in countries where Norwegian law does not apply. Special rules have been stipulated for employees with responsibility for relations with customers and suppliers.

Our anti-corruption programme consists of three main elements:

1. Preventive activities
2. Control and detection
3. Follow-up and sanctions

Preventive activities include clear definitions and rules, clear authorisations, risk mapping, training and information material.

Control and detection include audits, compliance, notification/whistleblowing, reporting and internal investigation. Follow-up and sanctions take place in accordance with policies and instructions, and are decided by HR and, ultimately, the CEO.

The programme gives a detailed description of what is meant by corruption, examples of acceptable and unacceptable behaviour, and assignments intended to contribute to reflection on difficult situations.

It is not permitted to accept gifts worth more than NOK 500. Regardless of the gift's value, it must not be accepted if it means that the employee's partiality or independence can be placed in doubt. All gifts and hospitality activities must be registered in the Company's gift and hospitality register.

All managers are responsible for establishing procedures and processes in their area of responsibility in order to prevent and uncover irregularities and fraudulent acts, including corruption. The Internal Investigation Unit is tasked with uncovering corruption, and it is responsible for investigating concrete cases where improper conduct is suspected. The unit shall also contribute to establishing and developing procedures and processes that can prevent and uncover such matters.

The rules are available at gjensidige.no, on the intranet and in e-learning courses, and managers shall contribute to ensuring that employees are aware of the rules. The purpose is to prevent and help to put a stop to activities that may entail a breach of the regulations at an early stage.

All new employees in the Group participate in an introductory course at which ethics and corruption are on the agenda. Gjensidige does not make donations to politicians, political parties or organisations with a mainly political agenda.

Money laundering and financing of terrorism

Gjensidige is obliged to take a risk-based approach to money laundering and financing of terrorism in relation to its customers, based on the customer relationship and the type of products and transactions involved. In practice, this means that we carry out a risk assessment in connection with the sale of insurance to new and existing customers, and with the payment of claims. The risk assessment is comprehensive, and is based on characteristics of the customer, the customer relationship, the product, the transaction and other matters of relevance.

All customers are checked against sanction lists and lists of politically exposed persons. The risk assessment may result in more extensive customer due diligence measures. Customer service staff are subject to clear guidelines for when such measures shall be initiated, and how to handle such a situation. If such measures fail to clarify the situation, the Company will carry out more detailed investigations in order to clarify whether the transaction can be carried out. The investigations are carried out by the Company's investigation department, which comprises employees who have previously worked in the police force, and have expertise in and experience of investigation. In cases where there is a sufficiently strong suspicion of money laundering or financing of terrorism, Gjensidige will report the matter as a suspicious transaction to the Norwegian National Authority for Investigation and Prosecution of Economic and Environmental Crime (Økokrim). If money laundering or financing of terrorism can be substantiated, the Company will not enter into the insurance contract or settle the claim, to the extent that such sanctions are permitted by law.

A solid defence against money laundering is not only necessary because of official instructions. In the insurance business, money laundering often goes hand in hand with insurance fraud. At Gjensidige, we consider the fight against money laundering as a natural part of good risk selection, based on the principle 'know your customers'. Instructions relating to money laundering have been adopted by the Board, and a risk assessment focusing on money laundering is presented to the senior group management once a year. The importance of combating money laundering is clearly communicated at all levels.

The money laundering regulations for banking and investment services deviate slightly from the insurance industry. Separate money laundering instructions have been established for Gjensidige

Bank, as well as clear procedures for uncovering and dealing with suspected money laundering. An anti-money laundering officer has been appointed, who follows up cases that the customer service staff cannot resolve themselves.

Employees who have contact with customers undergo thorough training in money laundering regulations and procedures. This applies in all parts of the Group.

Effect of our efforts

- The Internal Investigation Unit assessed 48 cases in 2018 (2017: 48) concerning suspicion of malpractices or irregularities. Of these cases, 15 resulted in verbal cautioning or a stronger reaction.

Customer complaints

- The Financial Services Complaints Board received 297 complaints from Gjensidige customers in the first nine months of 2018. This equalled 12 per cent of the total number of complaints to

the Board. Gjensidige's market share in 2018 was approximately 25 per cent.

- Of the cases reported to the Financial Services Complaints Board, the Board found in favour of the customer in whole or in part in 18 per cent of the cases in 2018, compared to 15 per cent in 2017. A high percentage would indicate that the threshold for succeeding with a complaint internally in Gjensidige is high.
- We don't have comparable statistics regarding Sweden and Denmark, both because of diverging statistical routines and low market shares. We regard the level of complaints as acceptable, but continually strive to reduce the number.

New measures

- Gjensidige will join the Global Reporting Initiative or other reporting initiatives (2-5 years).
- Integrate TFCF (Task Force on Climate-related Financial Disclosure) in annual reports (1-2 years).
- Group policy for sustainability.

Governing documents of particular relevance to the exercise of corporate social responsibility

Risk management

- Group policy for risk management and internal control
- Information security policy
- Underwriting policy

Protection of privacy

- Group policy for the processing of personal data
- Instructions for the processing of personal data
- Instructions for employees' processing of personal data

Asset management:

- Group policy for SRI – ethical investments
- Group instructions for SRI – ethical investments

Complaints handling

- Guidelines for the companies' and customer ombudsman's complaints handling

Procurements

- Group policy for procurements
- Guidelines for procurements

Ethics

- Code of Conduct
- Ethical Rules for Gjensidige
- Specification of ethical rules
- Policy on prohibited restriction of competition

Corruption

- Group policy for handling irregularities and malpractices, including corruption
- Instructions for handling irregularities and malpractices, including corruption

Money laundering

- Group policy for money laundering
- Job instructions for the anti-money laundering officer

Key figures, CSR

Topic		2018	2017	2016	2015	2014
Value creation and resource use						
Return on equity	Per cent	17.3	21.3	21.4	17.4	18.1
Dividend	NOK millions	3,550 ¹	3,550	3,400	6,200	2,950
Distribution percentage	Per cent	95.5	79.0	73.0	84.5	70.4
Paid tax	NOK millions	1,282	1,250	1,377	1,057	853
Pay and employee benefits	NOK millions	2,982	2,803	2,261	2,432	2,163
Customer satisfaction (CSI group)		78.1	77.9	77.4	76.2	74.8
The environment						
Energy consumption	MWh	12,671	12,773	11,988	11,131	8,060
CO2 emissions, Scope 1 and 2 ²	Tons	5,426	5,354	5,150	5,456	7,277
Paperless customers Per cent	Per cent	73	70	65	60	57
Employees						
Employees, proportion men/women ³	Per cent	52/48	52/48	53/47	52/48	50/50
Managers, proportion men/women ³	Per cent	63/37	63/37	64/36	63/37	59/41
Competence-raising per employee	NOK	11,100	10,300	15,000	17,500	17,500
Sickness absence ³	Per cent	3.8	3.9	3.9	4.1	4.5
Socially responsible investments						
Number of excluded companies	Number	91	89	85	80	85

¹ Based on the Board's proposal.

² Emissions for 2014 deviates from reported emissions in the Annual report for 2014, when Norwegian only emissions were reported.

³ Norway, Denmark and Sweden.

6. Memberships, commitments, certifications

Rating	Result
Morgan Stanley (MSCI) Sustainalytics CDP IPSOS Sustainable Brand	BBB BBB D Best reputation in Norwegian Finance Industry Most sustainable brand in Norwegian insurance industry
Bearingpoint Equileap Universum	Most digital insurance company in Norway Best gender balance among Norwegian companies Most attractive employer in the insurance industry
We support	
Paris 2015 UN Global Compact NORSIF UN Principles for Sustainable Insurance	
The church city mission	
Certified	
Eco-Lighthouse	