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Warning: The Digital Template was developed and tested using Microsoft Excel 365. Functionality may be limited or incorrect when using other spreadsheet applications or older versions of Excel.

Taxonomy entry point:

<https://xbrl.efrag.org/taxonomy/vsme/2025-07-30/vsme-all.xsd>

Select Template Display Language: [English - Official \[en\]](#)

Main title of the report

Sustainability Report

Prepared in accordance with the Voluntary Sustainability

Reporting Standard for small and medium-sized undertakings

Subtitle of the report

(VSME), released by the European Commission on 30 July

VSME Digital Template

The purpose of this digital template is to illustrate how VSME reporting can be implemented in a digital template. The template reflects the VSME Recommendation as published by the European Commission on 30 July 2025. The template is accompanied by a digital VSME XBRL taxonomy, which represents the digital data model of the disclosures and is available on EFRAG's website. The VSME requires disclosure of comparative information on metrics (paragraph 12). This template enables reporting for one reporting period only. Therefore, it might be used for reporting in the first year only. It is expected that reporting solutions will enable the roll-forward of reporting periods, which would automatically provide the necessary comparative information.

This template can be used for data entry and validation. By using an XBRL Converter on EFRAG's website, it can be saved as an XBRL report, in a free and open data format. Excel-named ranges are used to extract the disclosures. Value cells that are empty and do not have any value (neither text nor a number) will not be considered as reported and will not be included in the XBRL report when using the Excel-to-XBRL converter.

A few drop-down selection menus in the VSME have more than 100 entries (e.g. the NACE codes under B1, the list of pollutants under B4, the list of wastes under B7). In order to search in the list, users can simply start typing search keywords in the cell.

If a security warning is shown, please "Enable Content" in order to allow automatic calculation of GPS coordinates for the list of sites under B1. No content other than the address entered will be sent to the internet and the contents shared with the provider can be found in the Nominatim Usage Policy (Geocoding Policy) and Privacy Policy.

All materials developed by the EFRAG Secretariat are released for free and as open source (MIT license), which will enable any stakeholder to further enhance them and integrate them into commercial solutions. However, respecting the license conditions, the reference to EFRAG must be mentioned by the providers of those commercial solutions. It's possible to consult the MIT License in the specific sheet.

If you wish to raise an issue with the VSME Digital Template or the Digital Template to XBRL Converter, please do so by creating an issue in the GitHub project.

How to use it:

0. Provide information that is mandatory in order to generate the VSME and XBRL Report.

1. Fill in the disclosures on the four worksheets (General Information, Environmental Disclosures, Social Disclosures, Governance Disclosures) in the white cells framed by a black border. Do not enter information outside of those cells. Searching in drop-downs can be done by typing into the cell. Hints (input messages) are shown in several cells when selecting them.

2. Find more information on the actual disclosure requirements in the VSME Standard and the related guidance linked to each cell. Additional or entity-specific disclosures can be provided in each text box at the end of each worksheet.

3. For open tables like the List of subsidiaries/sites, please expand the groups by clicking the plus [+] icon on the left side. If more rows are needed, they can be added by inserting them between the first and last row. The row IDs in open tables must remain unique per table.

4. Validate the data entered by checking the validation status. The report is considered incomplete or erroneous if the validation fails, which might result in an invalid XBRL report.

5. Convert this template to an Inline XBRL report (or XBRL-JSON, XBRL-CSV), using the online converter. Pay attention to the XBRL validation performed by the validator.

6. The undertaking may also upload the report to public repositories or a webpage.

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Table of Contents	Overall Validation Status
	INCOMPLETE
	Specific Content Validation Status
Contents grouping follows template's framework	
General Information	
- Information on the report necessary for XBRL	OK
- Information on previous reporting period	-
BASIC MODULE	
General Information	
- B1 - Basis for Preparation	VALUE INCONSISTENCY
Basis for Preparation and other undertaking's general List of subsidiaries	VALUE INCONSISTENCY
Disclosure of sustainability-related certification(s) or List of site(s)	-
- B2 - Practices, policies and future initiatives for	OK
Practices, policies and future initiatives for transitioning Cooperative specific disclosures	OK
- B2 - Practices, policies and future initiatives for	-
Practices, policies and future initiatives for transitioning Cooperative specific disclosures	-
Environmental Disclosures	
- B3 - Energy and greenhouse gas emissions	OK
Total Energy Consumption (in MWh)	OK
Breakdown of energy consumption (in MWh)	-
Estimated Greenhouse Gas Emissions considering the Greenhouse gas emission intensity per turnover	OK
- B4 - Pollution of air, water and soil	OK
- B4 - Pollution of air, water and soil	-
- B5 - Biodiversity	-
Sites in biodiversity sensitive areas	-
Biodiversity - Land-use	-
- B6 - Water	OK
Water Withdrawal	OK
Water Consumption	-
- B7 - Resource use, circular economy and waste	OK
Description of circular economy principles	OK
Waste generated	OK
Annual mass-flow of relevant materials used	-
Social Disclosures	
- B8 - Workforce - General characteristics	OK
Type of contract	OK
Gender	OK
Country of employment	-
Turnover rate	OK
- B9 - Workforce – Health and safety	OK
- B10 - Workforce – Remuneration, collective bargaining	MISSING VALUE
Governance Disclosures	
- B11 - Convictions and fines for corruption and bribery	-
Comprehensive Module	
General Information	
- C1 - Strategy: Business Model and Sustainability –	OK
- C2 - Description of practices, policies and future	OK
Environmental Disclosures	
- C3 - GHG reduction targets and climate transition	OK
GHG reduction targets (in tCO2e)	-
Disclosure of list of main actions the entity seeks in order Transition plan for undertakings operating in high climate	-
- C4 - Climate risks	OK
- C4 - Climate risks	-
Social Disclosures	
- C5 - Additional (general) workforce characteristics	OK
- C6 - Additional own workforce information - Human rights	OK
- C7 - Severe negative human rights incidents	OK
Governance Disclosures	
- C8 - Revenues from certain activities and exclusion from	-
Revenues from certain activities	-
Exclusion from EU reference benchmarks	-
- C9 - Gender diversity ratio in the governance body	OK
Additional Disclosures	
- Disclosure of any other general and/or entity specific	
- Disclosure of any other environmental and/or entity	
- Disclosure of any other social and/or entity specific	
- Disclosure of any other governance and/or entity specific	

Information on the report necessary for XBRL (Always to be reported)	
Name of the reporting entity	Cultura sparebank
Identifier of the reporting entity (select and specify on the right)	1967007LEKZXPB0354
Currency of the monetary values in the report	NOK
Starting year	2025
Starting month	1
Starting day	1
Reporting period start date (yyyy-mm-dd)	2025-01-01
Ending year	2025
Ending month	12
Ending day	31
Reporting period end date (yyyy-mm-dd)	2025-12-31

Information on previous reporting period	
16	
This report contains disclosures from the previous reporting period that remain unchanged	<input type="checkbox"/>

B1 - Basis for Preparation and other undertaking's general information from 2025-01-01 to 2025-12-31 (Always to be reported)	
Basis for preparation (Basic Module Only or Basic & Comprehensive Module)	Option A (Basic Module only)
List of omitted disclosures deemed to be classified or sensitive information	None
Basis for reporting (consolidated or individual basis)	Sustainability report prepared on an individual basis
Undertaking's legal form	other (please specify the legal form in the row below)
Other undertaking's legal form specification	Norwegian savings bank (sparebank)
NACE sector classification code(s)	NACE L - 64.19 Other monetary intermediation
Size of balance sheet (total assets) in NOK	1 553 140 083
Turnover in NOK	24 432 278
Number of employees	25
Employee counting methodology (At the end of reporting period or as an average during the reporting period)	At the end of the reporting period
Employee counting methodology (Headcount or Full-time equivalent)	Headcount
Country of primary operations and location of significant asset(s)	Norway

B1 - Disclosure of sustainability-related certification(s) or label(s) from 2025-01-01 to 2025-12-31 (If applicable)	
25	
13	
Has the undertaking obtained any sustainability-related certification(s) or label(s) ?	<input checked="" type="checkbox"/>
Description of sustainability-related certification(s) or label(s) including where relevant the issuers of the certification or label date and rating score	Miljøfyrtårn

B1 - List of site(s) from 2025-01-01 to 2025-12-31 (Always to be reported)					
26					
12					
ID	Address	Postal code	City	Country	GPS Coordinates Automatic geolocation: Nominatim Usage Policy
1	Holbergs gate 1	0166	Oslo	Norway	Longitude
2					-
3					-

B2 - Cooperative specific disclosures from 2025-01-01 to 2025-12-31 (If applicable)	
15	
Effective participation of workers users or other interested parties or communities in governance	<p>Bankens forstanderskap er det øverste styringsorganet og har myndighet til å:</p> <ul style="list-style-type: none"> -Velge styret -Godkjenne og endre bankens vedtekter -Beslutte kapitalutvidelser -Godkjenne bankens regnskap -Godkjenne eventuelle sammenslåinger med andre banker <p>Forstanderskapet velges av flere interessentgrupper, noe som sikrer bred og demokratisk deltakelse:</p> <p>Innskyttere (kunder) – personer som siste 6 måneder har hatt et innskudd på minst 2 500 kr, har stemmerett og kan velges.</p> <p>Egenkapitalbevisere – representert ved 4 medlemmer og 1 vararemed, med en stemmebegrensning slik at ingen kan avgi mer enn 10 % av totalstemmer.</p> <p>Ansatte – deltar i valg av representanter til forstanderskapet.</p>
Financial investment in the capital or assets of social economy entities referred to in the Council Recommendation of 29 September 2023 (excluding donations and contributions)	
Any limits to the distribution of profits connected to the mutualistic nature or to the nature of the activities consisting in services of general economic interest (SGEI)	<p>Bankens vedtekter fastslår at stiftere eller andre ikke har rett til overskudd utover eventuell forentning av egenkapitalbevis.</p> <p>Årets overskudd etter fradrag for utbytte og gaver skal legges til bankens fond. Overskuddet fordeles mellom bankens grunnfond og eierandelskapitalen, og utbyttemidler kan anvendes til:</p> <ul style="list-style-type: none"> - Utbytte på eierandelskapitalen - Gaver til allmenntilgode formål - Overføring til gavefond eller stiftelser med allmenntilgode formål.

C2 - Description of practices policies and future initiatives for transitioning towards a more sustainable economy from 2025-01-01 to 2025-12-31 (If applicable linked with B2)	
Description of a practice policy and/or future initiative towards a more sustainable future (in case the practice policy future initiative covers suppliers or clients the undertaking shall mention it)	Cultura er en bank som finansierer samfunnsjenlige prosjekter og styrer kapital mot reelle behov i samfunnet. Utlåen er kjernevirksomheten, og bedriftene og prosjektene vi låner ut penger til vi skal være i tråd med våre verdier og overordnede mål som en verdibasert bank. I tillegg har vi en eksklusjonsliste over sektorer og adferd vi ikke låner ut penger til. Denne finnes rapportert i del C3.
Description of target related to a policy	Daglig leder har det overordnede ansvaret for å implementere bankens bærekrafts- og etikkpolitikk. Alle avdelingsledere har ansvar for å følge opp og sikre at retningslinjene blir etterlevd i sine respektive områder og i kontakt med kunder og samarbeidspartnere.
Most senior level within its employees that is accountable for implementing the policies when this has been determined by the undertaking	

C1 - Strategy, Business Model and Sustainability - Related Initiatives from 2025-01-01 to 2025-12-31 (Always to be reported)	
Description of significant groups of products and/or services offered	<p>Personlige utlån – boliglån og miljøboliglån</p> <p>Bedriftsutlån – finansiering for små og mellomstore bedrifter</p> <p>Innskudd – sparekontoer og brukerkontoer for privatpersoner og bedrifter</p> <p>Betalings tjenester – digitale betalinger, kortbruk og overføringer</p>
Description of significant market(s) the undertaking operates in (e.g. B2B, wholesale, retail, countries)	Cultura Bank opererer primært i Norge og retter sine tjenester mot både privatpersoner og bedrifter. Banken betjener B2C-markedet med personlige lån, innskudd og betalings tjenester, samt B2B-markedet med utlån og finansiering til små og mellomstore bedrifter, med særlig fokus på kunder og prosjekter som fremmer bærekraft og samfunnsansvar.

Description of main business relationships (such as key suppliers, customers, distribution channels)	Cultura Bank har privatkunder, næringskunder og organisasjoner som kunder. Banken samarbeider hovedsakelig med system- og IT-leverandører (Netcompany, tidligere SDC), oppgjørsbank (DNB), forsikringspartner (Frende Forsikring) og finansielle samarbeidspartnere (Norne Securities, Triodos Investment Management), og tilbyr tjenester via nettbank, mobilbank og personlig rådgivning
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C1 – Strategy: Business Model and Sustainability – Related Initiatives from 2025-01-01 to 2025-12-31 [if applicable]	
Description of those key elements in the strategy that relate to or affect sustainability issues	<p data-bbox="539 291 880 302"><i>Has the strategy key elements that relate to or affect sustainability issues?</i> <input checked="" type="checkbox"/></p> <p data-bbox="539 302 880 347">Till forskjell fra andre banker bedriver Cultura en positiv seleksjon av utlån på BM. Alle lån er inndelt i kategoriene «People», «Planet» og «Prosperity», såkalte «triple-bottom line lån».</p> <ul data-bbox="539 347 880 425" style="list-style-type: none"> •Under «People» finner vi blant annet lån til utdanning, kulturformål og helse- og omsorg. •Under «Planet» finner vi miljøboliglån og jordbruk som de største gruppene, dessuten distribusjon av økologiske produkter og andre miljøorienterte formål. •Under «Prosperity» finner vi lån til lokale småbedrifter.

Employee counting methodology for the disclosures below (Headcount or Full time Equivalent linked	Headcount
Employee counting methodology for the disclosures below (At the end of the reporting period or as an	At the end of the reporting period

B8 – Workforce – General characteristics - Type of contract [Always to be reported]	
39(a)	
110-117	
Type of contract	Number of employees
Permanent contract	21,00
Temporary contract	0,00
Total employees (linked to B1)	25,00

B8 – Workforce – General characteristics - Gender [Always to be reported]	
39(b)	
110-117	
Gender	Number of employees
Male	10,00
Female	15,00
Other	
Not reported	
Total employees (linked to B1)	25,00

B8 – Workforce – General characteristics - Turnover rate from 2025-01-01 to 2025-12-31 [If applicable]	
40	
118	
Number of employees who left during the reporting period	13,00
Number of employees at the beginning of the reporting period	37,00
Number of employees at the end of the reporting period	24,00
Employee turnover rate (%) in the reporting period	42,62 %

B9 – Workforce – Health and safety from 2025-01-01 to 2025-12-31 [Always to be reported]	
Number of recordable work-related accidents in the reporting period	0,00
Number of hours worked by one full-time employee in the reporting period	2000,00
Total number of hours worked in a year by all employees in the reporting period	5000,00
Rate of recordable work-related accidents in the reporting period	-
Number of fatalities as a result of work-related injuries and work-related ill	0,00

B10 – Workforce – Remuneration collective bargaining and training from 2025-01-01 to 2025-12-31 [Always to be reported + If applicable]	
Employees receive pay that is equal or above applicable minimum wage	YES
Average gross hourly pay level of male employees (amount in)	366,00
Average gross hourly pay level of female employees (amount in)	361,00
Percentage gap in pay between the undertaking's female and male	1,37 %
Number of employees covered by collective bargaining agreements	7,00
Percentage of employees covered by collective bargaining agreements	28,00 %

B10 – Number of annual training hours per employee during the reporting period from 2025-01-01 to 2025-12-31 [Always to be reported]	
42(d)	
Gender	B10 – Number of annual training hours per employee during the reporting period
Male	
Female	
Other	
Not reported	
Average number of annual training hours per employee	
-	

C5 – Additional (general) workforce characteristics from 2025-01-01 to 2025-12-31 [May (optional)]	
Number of male employees at management level	2
Number of female employees at management level	3
Female-to-male ratio at management level for the reporting period	1,5
Total self-employed workers without personnel that are working exclusively	0,00
Total temporary workers provided by undertakings primarily engaged in	1,00

C6 – Additional own workforce information - Human rights policies and processes from 2025-01-01 to 2025-12-31 [Always to be reported]	
Does the undertaking have a code of conduct or human rights policy for its	
If yes does this cover:	
- child labour	<input type="checkbox"/>
- forced labour	<input type="checkbox"/>
- human trafficking	<input type="checkbox"/>
- discrimination	<input checked="" type="checkbox"/>
- accident prevention	<input type="checkbox"/>
- other? (if yes specify)	<input type="checkbox"/>
Specify other types of content covered by the code of conduct or human	
Does the undertaking have a complaint-handling mechanism for its own	YES

C7 – Severe negative human rights incidents from 2025-01-01 to 2025-12-31 [Always to be reported]	
Does the undertaking have confirmed incidents in its own workforce?	NO
If yes are incidents related to:	
- child labour	<input type="checkbox"/>
- forced labour	<input type="checkbox"/>
- human trafficking	<input type="checkbox"/>
- discrimination	<input type="checkbox"/>
- other? (if yes specify)	<input type="checkbox"/>
Specify other human rights related to the confirmed incidents	
Description of actions taken to address the confirmed incidents	
Is the undertaking aware of any confirmed incidents involving workers in	NO
Specification of any confirmed incident involving workers in the value chain	

B11 – Convictions and fines for corruption and bribery from 2025-01-01 to 2025-12-31 [If applicable]	
	<u>43</u>
	<u>141-144</u>
<i>Has the undertaking incurred in convictions and fines in the reporting</i>	<input type="checkbox"/>
Total number of convictions for the violation of anti-corruption and anti-	
Total amount of fines for the violation of anti-corruption and anti-bribery	

C8 – Revenues from certain activities from 2025-01-01 to 2025-12-31 [If applicable]	
<i>Is the undertaking deriving revenues from one of the activities listed</i>	<input type="checkbox"/>
Revenue derived from controversial weapons (anti-personnel mines)	Monetary amount in
Revenue derived from cultivation and production of tobacco	
Revenue derived from coal	
Revenue derived from oil	
Revenue derived from gas	
Total revenues derived from fossil fuel (coal oil and gas) sector (i.e.	-
Revenue derived from chemicals production	

C8 – Exclusion from EU reference benchmarks from 2025-01-01 to 2025-12-31 [Always to be reported]	
Undertakings are excluded from the EU Paris-aligned Benchmarks if they derive:	
1% or more of their revenues from exploration mining extraction	<input type="checkbox"/>
10% or more of their revenues from the exploration extraction	<input type="checkbox"/>
50% or more of their revenues from the exploration extraction	<input type="checkbox"/>
50% or more of their revenues from electricity generation with a GHG	<input type="checkbox"/>
None of the above	<input type="checkbox"/>
Undertakings are excluded from any EU reference benchmarks that are	-

C9 – Gender diversity ratio in the governance body at 2025-12-31 [If applicable]	
<i>Does the undertaking have a governance body in place?</i>	<input checked="" type="checkbox"/>
<i>Number of female board members at the end of the reporting period</i>	3,00
<i>Number of male board members at the end of the reporting period</i>	4,00
Gender diversity ratio in governance body	0,75

Disclosure of any other governance and or entity specific governance disclosures from 2025-01-01 to 2025-12-31 [May (optional)]	
<u>10</u>	