



Green Bond Framework
August 2024



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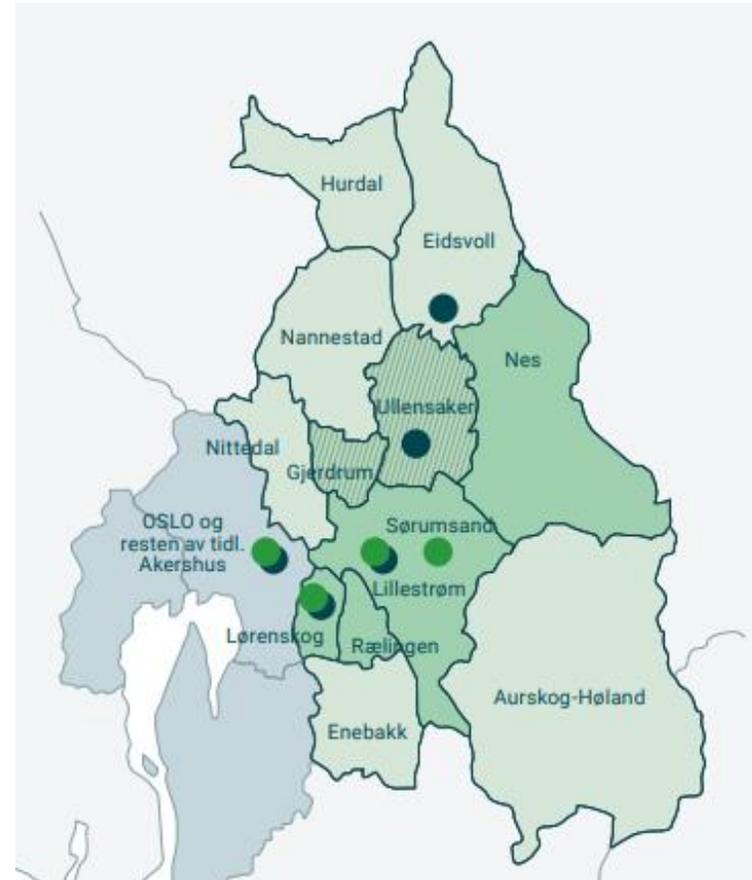
// This is Romerike Sparebank

Romerike Sparebank was established in 1887 to serve Lillestrøm and the surrounding areas with banking services. We are proud to have a long history, and to be Lillestrøm's oldest company. Our total assets, including Eika Boligkreditt, are just over NOK 20 billion.

Romerike Sparebank's ambition is to be the bank for people and businesses in the Romerike area. Physical presence and being available to the customer in combination with delivering good digital solutions are core pillars in our long-term strategy. In addition to being the best bank for customers in the local community, we aim to be the most societal engaged bank, a catalyst for local business development, and the most attractive workplace in banking and finance in Romerike.

To succeed with our ambition to be to be a catalyst for business development in our region, we consider the most important support is to offer good, competitive financial products and services as well as good advice to companies in different phases of development. The bank has a corporate banking department with nine advisors who are dedicated to businesses and agriculture at Romerike. In addition, we have several resources in our customer service department that [are dedicated to] support corporate customers. Romerike Sparebank has the largest corporate banking department among the banks in our market area.

Romerike Sparebank supports the entrepreneurial environments in *Business Lillestrøm*¹, *Business Sørumsand* and *Business Jessheim*, which primarily are for companies that are early in their development phase. We also support this group through start-up grants, which are awarded three times a year. We support the more established companies and general business and place development through active participation in the business associations *Kunnskapsbyen Lillestrøm*, *Lørenskog i Utvikling*, *Sørums Næringsforum* and *Innovation Gardermoen*. Together with Lillestrøm municipality we have granted significant amounts to several projects that contribute to climate investments and increased sustainability through a climate and business fund.



¹ [Hjem – Business Lillestrøm \(businesslillestrom.no\)](https://www.businesslillestrom.no)

EIKA ALLIANCE

Romerike Sparebank is a shareholder in Eika Gruppen AS and one of the largest banks in the Eika Alliance, which consists of around 45 local banks, Eika Gruppen and Eika Boligkreditt.

Eika's core business is to ensure the banks in the alliance with modern, efficient and safe banking operations through cost-effective and high-quality product and service deliveries. Through Eika, the banks and their customers get access to a wide range of financial products, commercial solutions and competence-enhancing services.

Deliveries by Eika include a complete platform for banking infrastructure including IT, payment services and digital tools for interaction for banks' employees and customers. The banks' need to develop new digital solutions, which both contribute to an improved customer experience and safeguarding the customers' security, as well as handling an increasing number of regulatory requirements, are both demanding and cost driving.

Eika Boligkreditt is directly owned by 59 Norwegian local banks, including Romerike Sparebank. Its main purpose is to ensure that the owning banks have access to long-term and competitive financing. Since Eika Boligkreditt has permission to finance its lending activities by issuing internationally rated covered bonds ("OMF"), it can fund itself in both Norwegian and international capital markets. Thereby, the alliance banks maintain competitiveness to larger Norwegian and international banks. Eika Boligkreditt is therefore an important contributor to the Eika banks achieving a reduced financing risk and being able to maintain competitive terms on their mortgages.

The logo for Eika, featuring the word "eika." in a bold, lowercase, sans-serif font. The letters are a vibrant green color. The dot on the period is a solid green circle.

// Sustainability at Romerike Sparebank

Romerike Sparebank will be the most socially engaged bank in Romerike. We are passionate about contributing as far as we can to make our region an even better place to live and live.

We take social responsibility and work every day for the sustainable development of the Lillestrøm region through gifts, sponsorship and not least financing and other banking services. Sustainable urban development is one of the most important areas for us, a commitment to which not least the annual "Lillestrøm conference" has contributed. As examples, we contribute to the initiative "Join the upturn" to strengthen the attractiveness of Lillestrøm and the "Lillestrøm Innovation competition", which aims to put Lillestrøm city and municipality on the map as a door opener for players who need to test new sustainable and green products and/or services.

As a local savings bank, we want to contribute support to the local environment, and over the years has made many small and large contributions to culture and sport. Our goal is to contribute to creating pleasant and viable local communities by returning part of the bank's profits to teams and associations. We are convinced that a flourishing association life is the key to good well-being. Since 2015, Romerike Sparebank has distributed over NOK 45 million to local teams and associations in Romerike.

We do a lot to support the local environment: We have awarded founder grants in three installments to innovative and sustainable start-up companies, we have established a green initiative fund together with Lillestrøm municipality administration and distribute significant funds to local teams and associations through the local contribution.

That societal development must be sustainable has gradually become an important topic, but at the same time it is not entirely clear in which way a local savings bank can best contribute to a more sustainable future. The bank facilitates financing, which in turn leads to increased economic activity and growth. This will initially affect the environment negatively and use up the planet's limited resources. We work actively to minimize the negative impact by making demands that our customers, suppliers and partners use products and working methods that have the least possible negative impact.



UN SUSTAINABILITY DEVELOPMENT GOALS

Romerike Sparebank has reviewed which of the UN Sustainability Development Goals (SDGs) the bank should emphasize. We want to set goals which are ambitious. We have selected two SDGs that we want to contribute to:

- SDG 9: Industry, innovation and infrastructure
- SDG 11: Sustainable cities and local communities

In addition, there are two SDGs that are important to the bank, which are well incorporated in today's operations and therefore is natural to contribute to:

- SDG 8: Decent work and economic growth
- SDG 12: Responsible consumption and production

<div data-bbox="197 537 317 659">  <p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE</p> </div> <div data-bbox="331 553 1033 643"> <p>SDG 9: Industry, innovation and infrastructure "Build solid infrastructure and promote inclusive and sustainable industrialization and innovation"</p> </div> <div data-bbox="197 678 1010 992"> <p>Our contribution: Through financing, gifts and grants, the bank supports companies that create new and innovative solutions. There are exciting businesses in our region that are leaders in energy, infrastructure and urban development.</p> <ul style="list-style-type: none"> - We aim to offer valuable advice and financial solutions and cheer on those who dare to invest in new development and innovation, and who contribute to more jobs in the region. - Several companies have received founder grants from Romerike Sparebank and funding support through a green initiative fund - We support and collaborate closely with regional start-up organizations - We arrange and facilitate meeting places for our customers </div>	<div data-bbox="1054 537 1173 659">  <p>11 SUSTAINABLE CITIES AND COMMUNITIES</p> </div> <div data-bbox="1188 553 1850 643"> <p>SDG 11: Sustainable cities and communities "Making cities and communities inclusive, safe, resilient and sustainable."</p> </div> <div data-bbox="1054 678 1881 1019"> <p>Our contribution: We are supporting and developing our local community. We will contribute to Lillestrøm and Romerike communities becoming a role model in Norway for the development of safe, sustainable cities and local communities.</p> <ul style="list-style-type: none"> - We are a main contributor to the <i>Lillestrøm conference</i>, a leading arena in the region for building networks and for discussing sustainable urban development and innovation - We distribute 15% of the result in gifts to local teams, associations and sustainable initiatives - We continue to develop the sustainability competence of the bank's customer advisors in order to improve and enhance our offering of sustainable products to private and business customers </div>
<div data-bbox="197 1053 317 1175">  <p>8 DECENT WORK AND ECONOMIC GROWTH</p> </div> <div data-bbox="331 1062 1003 1154"> <p>SDG 8: Decent work and economic growth "Promote lasting, inclusive and sustainable economic growth, full employment and decent work for all"</p> </div> <div data-bbox="197 1187 1020 1360"> <p>Our contribution: Banks have a great responsibility for contributing to equal conditions for businesses or those who invests. The banks have strict requirements to limit money laundering. Romerike Sparebank has zero tolerance for money laundering, social security fraud and tax evasion. We report anyone who tries to defraud us to the police, and we report suspicious transactions to the Norwegian financial crime unit ("Økokrim").</p> </div>	<div data-bbox="1054 1053 1173 1175">  <p>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</p> </div> <div data-bbox="1188 1062 1829 1162"> <p>SDG 12: Responsible consumption and production "Ensure sustainable consumption and production patterns"</p> </div> <div data-bbox="1054 1195 1887 1395"> <p>Our contribution: As a rich country we have in general a relative high consumption of consumer goods, which generate production and transport which in turn generate emissions of greenhouse gases and waste. Although we at Romerike Sparebank has relatively small purchases, but we can increase our awareness of buying less and become better at ensuring that what we buy is as sustainable as possible. We want to buy products produced locally.</p> </div>

SUSTAINABLE OPERATIONS

Over several years, sustainability has been an important topic for the bank. Sustainability is now a core part of the bank's strategy, and the Board is closely involved in the work of the annual revisions of the strategy, and that the sustainability report, reporting in accordance with the UN's principles for sustainable banking.

We have conducted a comprehensive materiality analysis to select the topics where the bank has the most to contribute. In connection with this, we established a working group in which all business and support areas in the bank were represented. The bank's executive management team was the steering group for the project, and the Board was briefed regularly.

The areas where the bank believes we have the most to contribute are:

- Ethical and responsible banking operations
- Diversity, equality and inclusion, inside and outside the bank
- Responsible lending and sustainability dialogue with customers
- Reducing greenhouse gas emissions
- Handling ESG risk
- Financial inclusion and community involvement
- Combating financial crime and money laundering
- Sustainability in the supply chain

The ambition for the bank going forward is to reduce climate footprint from our own operations and assist our customers to reduce their climate impact. We also aim to improve our efforts on anti-money laundering and financial crime, and we want to continue to support the development of our local environment.

We acknowledge the importance to quantify the bank's overall climate emissions and, assisted by the Eika Gruppen, we are well underway in facilitating data collection and creating models to estimate *financed emissions*. Financed emissions are emissions made by the customers that the bank finances. The bank's direct emissions from, for example, buildings and traveling are small compared to the financed emissions as the bank has relatively space-efficient offices, most employees live close to the bank and travel by public transport or by electric car and we have very limited flights.

Romerike Sparebank has established ethical guidelines which are regularly revised and reviewed by all employees. The guidelines define good business practice and how the bank's employees should avoid or handle difficult situations such as conflicts of interest, integrity assessments and communication.



Sustainability and climate risk assessment

Romerike Sparebank aim to have an active relationship with the society, the climate and the environment in its lending activities. As part of the credit assessment of all corporate customers the customer adviser must make an assessment of these factors must be included.

For existing corporate customers, with credit commitment above a threshold which requires annual review and renewal, the customer's sustainability score must be updated and determined. The sustainability assessment must contain a classification that contains a self-assessment with a focus on *physical risk* and *transition risk*. Physical risk means changes as a result of climate change such as heat waves, droughts, floods and storms. Transition risk is risk that results from the transition to a low-carbon society. Changes in politics, technology and public sentiment can lead to changes in cash flows and in the value of assets.

Romerike Sparebank has prepared a framework for corporate customers within three industry segments, building construction, real estate and agriculture, which make up about 90% of the business portfolio, to help ensuring that the customer adviser can carry out the sustainability assessments. This includes mapping of the risk for undeclared work, breaches of environmental requirements, waste management and physical impacts from climate change. When assessing a customer's sustainability risks in the credit assessment, the lack of environmental consideration by a customer can lead to discontinuation of the bank/customer relationship.

For the bank's private market customers, the credit file must contain assessments of the bank's security in housing in relation to location and associated increased physical risk due to climate change (landslides/floods). Specific guidelines for the bank's sustainability work are described in the bank's credit handbook.

Offering of Green Loans

Over the past few years, Romerike Sparebank has focused on product development to incentivize customers to make sustainable choices and wants to reward customers who do something active for a greener environment with better terms on mortgage loans.

We offer **Green mortgage loans** and **Green rehabilitation loans**, which are intended to give customers an incentive to implement energy efficiency measures for their homes. If energy savings is more than 30% and get a better energy label than grade D can apply for a Green rehabilitation loan, and if approved the customer receives 0% interest for the first 12 months and thereafter a reduced interest cost of 1% point compared to an ordinary loan for the next 4 years.



Diversity and equality

Romerike Sparebank wants to have employees who reflect the society of which we are a part. We aim for diversity and equality and emphasize this in the recruitment processes as well as in the development of employees. We strive for a gender balance in all departments and levels in the bank, balancing this with the necessary competence to fill the position. In 2023, the bank signed up to the "Women in Finance" charter and aims to have a gender balance among the bank's managers and middle managers of at least 40/60%.

With our values, Personal, Engaged and Local, we want all our employees to be able to be themselves and express who they are. Everyone must treat colleagues and customers with respect, regardless of gender, functional level, pregnancy, sexual orientation, gender identity, religion, outlook on life or cultural and social background.



Responsible procurement

Romerike Sparebank is covered by the requirements under the Transparency Act, where there is a focus on responsible procurement throughout the value chain with regard to social conditions and human rights. Our largest purchases are handled through the Eika Group and our suppliers are mostly Norwegian service providers.

We emphasize buying locally as much as possible and work with suppliers who are concerned with local growth and community development, and therefore it is natural to choose local suppliers. We particularly value suppliers who, in addition to being rooted locally, also contribute positively to the development of the local environment in other ways.





// Romerike Sparebank and Green Bonds

With this Green Bond Framework (the “Framework”) we want to combine our ambition of contributing to a sustainable development of our local community and access the sustainable debt market by issuing Green Bonds.

This Framework is aligned with the guidelines of the International Capital Markets Association Green Bond Principles (the “**ICMA GBPs**”), where an updated version was published in June 2022². Our aim is to always meet best market practices by adhering to relevant standards and guidelines in the green bond market. This Framework may over time be updated, however new versions of the Framework shall have no implications for the Green Bonds issued under this version of the Framework.

Aligned with the ICMA GBPs, the Framework defines the criteria for which loans are eligible to be financed by Green Bonds, while it also outlines the process to evaluate, select, track and report on such lending activities. Each Green Bond issued will refer to this Green Bond Framework in their relevant transaction documentation. The terms and conditions contained in the underlying documentation for each issued Green Bond will specify the actual terms of the instrument.

1. USE OF PROCEEDS

An amount equal to the net proceeds from Green Bonds issued under this Framework will be used to finance a portfolio of loans provided by Romerike Sparebank that promote the transition towards low-carbon and climate-resilient development.

Only such loans that comply with the criteria listed below are deemed eligible to be financed by Green Bonds (the “**Green Loan Portfolio**”). The net proceeds Green Bond can be used for both financing of new and/or refinancing of existing Green Loans.

The Green Loan Portfolio has been mapped against the different categories included in the ICMA GBPs and ICMA’s Environmental Objectives³, and the UN Sustainable Development Goals⁴ (the “**UN SDGs**”), as well as the relevant economic activities and related criteria and thresholds for the environmental objective “*Climate change mitigation*” included in the EU Taxonomy Regulation⁵ (the “**EU Taxonomy**”).

For the avoidance of doubt, Green Bonds will not be used to finance loans to customers linked to fossil energy extraction generation, development and production of weapons and defense systems, potentially environmentally negative resource extraction, gambling, pornography or tobacco.

²[Green-Bond-Principles-June-2022-060623.pdf \(icmagroup.org\)](#)

³[Green-Project-Mapping-June-2021-100621.pdf \(icmagroup.org\)](#)

⁴[THE 17 GOALS | Sustainable Development \(un.org\)](#)

⁵[EU taxonomy for sustainable activities - European Commission \(europa.eu\)](#)

Green Loan Portfolio:

ICMA GBPs category	Green Loan criteria	EU Taxonomy activity	UN SDG(s)
<p>Green Buildings</p> <p><i>Related GBP Environmental Objective:</i></p> <ul style="list-style-type: none"> • Climate change mitigation • Climate change adaptation 	<p>Loans financing residential, public and commercial buildings⁶ which meet either of the criteria set out below:</p> <p>1) Buildings built in 2021 or later:</p> <ul style="list-style-type: none"> - Residential buildings: Primary energy demand (PED)⁷ is 10% lower than the threshold set for the nearly zero-energy building (NZEB) requirements in national measures⁸. - Public and commercial buildings: EPC A or BREEAM-NOR / BREEAM In-Use “Excellent” or better. <p>2) Buildings built before 2021:</p> <ul style="list-style-type: none"> - Residential buildings: Energy Performance Certificate (EPC) A, or alternatively, buildings within the top 15% of the national stock in terms of primary energy demand, defined as buildings built according to Norwegian building codes of 2010 (TEK10)⁹ or 2017 (TEK17)¹⁰. Buildings built prior to 2012 must obtain minimum EPC B. - Public and commercial buildings: EPC A or B, or BREEAM-NOR / BREEAM In-Use “Excellent” or better. <p>3) Renovated buildings:</p> <p>Major building renovations leading to a reduction in primary energy demand of at least 30%¹¹. For the full building to qualify after renovation, it should be expected to meet the criteria under #1 or #2 above.</p> <ul style="list-style-type: none"> - Public and commercial buildings: At least 70 % (by weight) of the non-hazardous construction and demolition waste generated is prepared for material recovery. 	<ul style="list-style-type: none"> • Acquisition and ownership of buildings • Renovation of buildings 	 
<p>Energy Efficiency</p> <p><i>Related GBP Environmental Objective:</i></p> <ul style="list-style-type: none"> • Climate change mitigation 	<p>Loans financing corporates which at least 90% share of its business (measured by revenues) is related to offering energy efficiency solutions such as:</p> <ul style="list-style-type: none"> • Smart house systems (hardware and software), such as smart lightening and smart metering to control and reduce energy consumption in private homes and public and commercial buildings. • Smart cities, such as lighting management system using IoT to make roads, sports facilities, bridges, tunnels, urban spaces, parks and other vital infrastructure safer and more energy efficient. • R&D expenses related to developing more environmentally friendly energy technology and solutions, including but limited to solar, wind, wave and geothermal power, carbon capture and storage (CCS), battery, robots, and sensors. 		 

⁶ Excluding buildings for leisure (cabins or similar)

⁷ The calculated amount of energy needed to meet the energy demand associated with the typical uses of a building expressed in kWh/m² per year and based on the relevant national calculation methodology and as displayed on the Energy Performance Certificate (EPC).

⁸ [veiledning-om-beregning-av-primarenergibehov-og-nesten-nullenergibygg.pdf \(regjeringen.no\)](#)

⁹ To ensure TEK10-alignment, we use a conservative 2-year time lag and include buildings built from 2012 and onwards.

¹⁰ If a new national definition of “top 15%” is developed TEK10 and TEK17 will be replaced with this.

¹¹ The initial primary energy demand and the estimated improvement is based on an energy audit conducted by an independent expert. The 30% improvement results from an actual reduction in primary energy demand and be achieved through a succession of measures within a maximum of three years.

2. PROCESS FOR SELECTION AND EVALUATION OF THE GREEN LOAN PORTFOLIO

To ensure the transparency and accountability around the selection of Green Loans, Romerike Sparebank has established an internal Green Bond Committee (the “GBC”) is responsible for this Framework and defining the Green Loan criteria included herein, selecting the loans to be included in the Green Loan Portfolio and keep a register of identified Green Loans, as well as future oversight and requirements for updates of the Framework. The GBC will consist of members from the Executive Management and Treasury department, and all decisions made will be made in consensus. To ensure traceability, all decisions made by the GBC will be documented and filed.

All lending activities by Romerike Sparebank always undergo regular and applicable credit approval processes, and corporate customers must be screened for environmental, social and governance (ESG) risks. Before granting a credit, Romerike Sparebank considers the purpose of the credit, and whether the customer runs a responsible business. This includes assessing that the customer’s products and services are produced in a sustainable way, the customer’s potential pollution of the environment and that the customer respects basic human rights. Customers which are not adopting an acceptable sustainable business practice in the opinion of the GBC will not be included in the Green Loan Portfolio (or excluded if already included). We also ensure that we conduct responsible lending practices by increasing the borrowers’ awareness and practices related to topics such as the environment, ethics, social responsibility, business operations and corporate governance.

Loans to be included in the Green Loan Portfolio must meet the Green Loan criteria defined in the Use of Proceeds section of this Framework. The GBC holds the right to, at their own discretion, not include loans in the Green Loan Portfolio, or exclude any loans already included in the Green Loan Portfolio. In the event of loans already included in the Green Loan Portfolio no longer meeting the criteria in this Framework, in the opinion of the GBC, such loans will be removed from the Green Loan Portfolio.

3. MANAGEMENT OF PROCEEDS

The net proceeds from issued Green Bonds will be allocated toward the financing and refinancing of our Green Loan Portfolio. The proceeds from a Green Bond will be allocated towards the Green Loan category listed under *1. Use of Proceeds* above.

Romerike Sparebank will track the allocation of net proceeds from Green Bonds to eligible Green Loans to ensure that the net proceeds from Green Bonds only support the financing of eligible Green Loans and that the value of the Green Loan Portfolio always exceeds the total nominal amount of Green Bonds outstanding.

If a Green Loan already funded by Green Bonds is redeemed, or for other reasons loses its eligibility in line with the criteria in this Framework, it will be replaced by another qualifying Green Loan as soon as practically possible.

In the event there is net proceeds from a Green Bond awaiting allocation to the Green Loans Portfolio, such amount will be categorized and reported as “unallocated” and be managed according to our Treasury department’s regular liquidity management policy for short-term investments¹². To the best of our endeavors the exclusions specified under *1. Use of Proceeds* above will also apply for such temporary holdings of net proceeds.

¹² Mainly government bonds, municipality bonds, covered bonds, senior bonds issued by savings banks. No investments will be made in shares.

4. REPORTING

To enable investors and other stakeholders to follow our issuance of Green Bonds, and the developments and impact of our Green Loan Portfolio, a Green Bond Report will be made available on our website. The Green Bond Report will include an “**Allocation Report**” and an “**Impact Report**” and will be published annually until proceeds are fully allocated.

Allocation Report

The allocation report will include the following information:

- The size of the identified Green Loan Portfolio per category, and the split between residential and commercial/public buildings.
- The nominal amount of Green Bonds outstanding.
- The share of the Green Loan Portfolio currently financed by Green Bonds.
- The amount of net proceeds awaiting allocation (if any).

Impact Report

The impact report aims to disclose the aggregated environmental impact of the Green Loans financed by Green Bonds. Calculations will be made on a best intention basis and be aligned with the portfolio approach described in ICMA’s “**Handbook - Harmonized Framework for Impact Reporting**” (June 2023)¹³, with full transparency of assumptions and calculation methods. We may rely on external parties to assist with impact calculation and analysis. The impact assessment will be based on the metrics below:

- **Green Buildings:**
 - Estimated annual energy consumption (kWh/m²).
 - Estimated avoided GHG emissions (tCO₂e/year) compared to baseline¹⁴.
- **Energy efficiency:**
 - Estimated contribution to energy consumption savings (kWh/year).
 - Estimated avoided GHG emissions (tCO₂e/year) compared to baseline¹⁵.

¹³ [Handbook-Harmonised-framework-for-impact-reporting-June-2023-220623.pdf \(icmagroup.org\)](#)

¹⁴ Using the grid factor of 191g CO₂/kWh as recommended in the Nordic Position Paper on Green Bonds Impact Reporting ([NPSI Position Paper on Green Bonds Impact Reporting 3/2024 \(kommuninvest.se\)](#))

¹⁵ Using the grid factor of 191g CO₂/kWh as recommended in the Nordic Position Paper on Green Bonds Impact Reporting ([NPSI Position Paper on Green Bonds Impact Reporting 3/2024 \(kommuninvest.se\)](#))

// External review

PRE-ISSUE VERIFICATION

Romerike Sparebank has engaged S&P Global Ratings (“**S&P**”) to assess the alignment of this Framework with the ICMA Green Bond Principles. S&P has confirmed such alignment by issuing their Second-Party Opinion (“**SPO**”).

The SPO will be publicly available on our website together with this Framework.

POST-ISSUE VERIFICATION

We will prepare the Green Bond Report to be issued annually or until full allocation of proceeds under a Green Bond. In connection to this a limited assurance report will be provided by an independent and qualified auditor, appointed by Romerike Sparebank, confirming that an amount equal to the net proceeds from issued Green Bonds has been allocated towards Green Loans in accordance with this Framework.

Furthermore, Romerike Sparebank will provide calculations of the estimated positive environmental impact, and the assumptions used therein, related to the Green Loan Portfolio.

The Green Bond Report will be made publicly available on our website by no later than 12 months after issue of a Green Bond.



Romerike Sparebank

Hovedkontor

Lillestrøm

Besøksadresse:
Torvet 5
2000 Lillestrøm

Postadresse:
Postboks 143
2001 Lillestrøm

Lokalkontor

Sørumsand

Besøksadresse:
Sørumsandvegen 57
1920 Sørumsand

Telefonnummer:
63 80 42 00

E-post:
post@rsbank.no

Rådgivningskontorer

Lørenskog

Besøksadresse:
Ola Hegerbergs Gate 10
1461 Lørenskog

Stovner

Besøksadresse:
Stovner Senter 3
0985 Oslo

Råholt

Besøksadresse:
Gladbakkgutua 22
2070 Råholt

Nettside:
www.rsbank.no

Org.nr.:
937 885 911