Principle 1: Alignment

We will align our business strategy to be consistent with and contribute to individuals’ needs and society’s goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement and relevant national and regional frameworks.

Business model
Describe (high-level) your bank’s business model, including the main customer segments served, types of products and services provided, the main sectors and types of activities across the main geographies in which your bank operates or provides products and services. Please also quantify the information by disclosing e.g. the distribution of your bank’s portfolio (%) in terms of geographies, segments (i.e. by balance sheet and/or off-balance sheet) or by disclosing the number of customers and clients served.

SBI Shinsei Bank Group (hereinafter “the Group”) is a Japanese financial institution that provides a wide range of financial products and services to our customers through corporate and individual businesses. All bank branches are located in Japan. The breakdown of loans by borrower industry shows that 94% of loans are for the domestic market, of which 40% are loans to business corporations, 38% to individual customers, and 18% to financial institutions (finance and insurance).

Financial Summary
P12: Segment Information
https://corp.sbishinsei
bank.co.jp/en/ir/library/
results/main/00/teaser
ltems3/07/linkList/0/lin
k/4qfy22financialsum
mary230512e.pdf

Strategy alignment
Does your corporate strategy identify and reflect sustainability as strategic priority(ies) for your bank?
☒ Yes
☐ No
Please describe how your bank has aligned and/or is planning to align its strategy to be consistent with the Sustainable Development Goals (SDGs), the Paris Climate Agreement, and relevant national and regional frameworks.

Does your bank also reference any of the following frameworks or sustainability regulatory reporting requirements in its strategic priorities or policies to implement these?
☒ UN Guiding Principles on Business and Human Rights
☐ International Labour Organization fundamental conventions
☒ UN Global Compact
☐ UN Declaration on the Rights of Indigenous Peoples
☐ Any applicable regulatory reporting requirements on environmental risk assessments, e.g. on climate risk - please specify which ones: ---------------------------
☐ Any applicable regulatory reporting requirements on social risk assessments, e.g. on modern slavery - please specify which ones: ---------------------------
☐ None of the above
- Our “Group Sustainability Management Policy” places sustainability at the core of the Group’s management
- In our Medium-Term Management Plan, “Achieve Sustainability through Business Activities” is one of the basic strategies
- With reference to the principles of the United Nations Global Compact, we have established action policies within the Group Sustainability Management Policy

<table>
<thead>
<tr>
<th>Principle 2: Impact and Target Setting</th>
</tr>
</thead>
<tbody>
<tr>
<td>Principle 2: Impact and Target Setting</td>
</tr>
<tr>
<td><strong>We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products and services. To this end, we will set and publish targets where we can have the most significant impacts.</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>2.1 Impact Analysis (Key Step 1)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Show that your bank has performed an impact analysis of its portfolio/s to identify its most significant impact areas and determine priority areas for target-setting. The impact analysis shall be updated regularly¹ and fulfill the following requirements/elements (a-d)²:</strong></td>
</tr>
</tbody>
</table>

**a) Scope:** What is the scope of your bank’s impact analysis? Please describe which parts of the bank’s core business areas, products/services across the main geographies that the bank operates in (as described under 1.1) have been considered in the impact analysis. Please also describe which areas have not yet been included, and why.

In addition to the "loans to domestic clients in Japan" that were analyzed last year, this year we have identified "loans to customers in Japan," which accounts for the second largest percentage, as the subject of analysis.

---

¹ That means that where the initial impact analysis has been carried out in a previous period, the information should be updated accordingly, the scope expanded as well as the quality of the impact analysis improved over time.

² Further guidance can be found in the Interactive Guidance on impact analysis and target setting.
**b) Portfolio composition:** Has your bank considered the composition of its portfolio (in %) in the analysis? Please provide proportional composition of your portfolio globally and per geographical scope

i) by sectors & industries for business, corporate and investment banking portfolios (i.e. sector exposure or industry breakdown in %), and/or

ii) by products & services and by types of customers for consumer and retail banking portfolios.

If your bank has taken another approach to determine the bank's scale of exposure, please elaborate, to show how you have considered where the bank's core business/major activities lie in terms of industries or sectors.

We have considered the composition of its portfolio in the analysis. The breakdown of loans by borrower industry shows that 94% of loans are for the domestic market, of which 40% are loans to business corporations, 38% to individual customers, and 18% to financial institutions (finance and insurance).

### Loans by Borrower Industry (Consolidated)

<table>
<thead>
<tr>
<th>Industry</th>
<th>Mar 31 2023</th>
<th>Mar 31 2022</th>
<th>Change (Amount)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Domestic offices (excluding Japan offshore market accounts):</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Manufacturing</td>
<td>338.8</td>
<td>267.0</td>
<td>131.7</td>
</tr>
<tr>
<td>Agriculture and forestry</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Fishery</td>
<td>0.1</td>
<td>1.3</td>
<td>0.6</td>
</tr>
<tr>
<td>Mining, quarrying and gravel extraction</td>
<td>0.3</td>
<td>0.3</td>
<td>-0.0</td>
</tr>
<tr>
<td>Construction</td>
<td>20.1</td>
<td>13.8</td>
<td>6.3</td>
</tr>
<tr>
<td>Electrical, natural gas and water supply</td>
<td>497.8</td>
<td>397.2</td>
<td>100.5</td>
</tr>
<tr>
<td>Information and communications</td>
<td>53.9</td>
<td>48.6</td>
<td>5.3</td>
</tr>
<tr>
<td>Transportation and postal service</td>
<td>215.2</td>
<td>170.5</td>
<td>44.6</td>
</tr>
<tr>
<td>Wholesale and retail</td>
<td>138.9</td>
<td>95.6</td>
<td>43.3</td>
</tr>
<tr>
<td>Finance and insurance</td>
<td>1,132.2</td>
<td>466.4</td>
<td>666.7</td>
</tr>
<tr>
<td>Real estate</td>
<td>829.2</td>
<td>702.1</td>
<td>127.1</td>
</tr>
<tr>
<td>Services</td>
<td>516.5</td>
<td>388.2</td>
<td>127.2</td>
</tr>
<tr>
<td>Local government</td>
<td>259.4</td>
<td>52.3</td>
<td>207.1</td>
</tr>
<tr>
<td>Others</td>
<td>2,488.1</td>
<td>2,250.0</td>
<td>218.0</td>
</tr>
<tr>
<td>Loans to individual customers</td>
<td>1,818.7</td>
<td>1,795.4</td>
<td>23.2</td>
</tr>
<tr>
<td>(Housing Loan, Unsecured Loan, Cashing by Credit Card, Housing Related Loan, etc.)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total domestic (A)</td>
<td>6,460.8</td>
<td>4,791.6</td>
<td>1,669.2</td>
</tr>
<tr>
<td>Overseas offices (including Japan offshore market accounts).</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Governments</td>
<td>-</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Financial institutions</td>
<td>15.5</td>
<td>22.8</td>
<td>-7.2</td>
</tr>
<tr>
<td>Others</td>
<td>412.3</td>
<td>427.3</td>
<td>-14.9</td>
</tr>
<tr>
<td>Total overseas (B)</td>
<td>427.9</td>
<td>450.1</td>
<td>-22.2</td>
</tr>
<tr>
<td>Total (A+B)</td>
<td>6,888.8</td>
<td>5,241.8</td>
<td>1,646.9</td>
</tr>
</tbody>
</table>

---

3 ‘Key sectors’ relative to different impact areas, i.e. those sectors whose positive and negative impacts are particularly strong, are particularly relevant here.
**c) Context:** What are the main challenges and priorities related to sustainable development in the main countries/regions in which your bank and/or your clients operate? Please describe how these have been considered, including what stakeholders you have engaged to help inform this element of the impact analysis.

This step aims to put your bank’s portfolio impacts into the context of society’s needs.

Since 94% of the Bank Group's loans by industry are for the domestic market, we used the Ministry of the Environment's "Impact Needs Map for Businesses in Japan" to identify major issues. This is a compilation of the SDGs Index & Dashboard, the Japanese government's SDGs Implementation Guidelines, and Japan's country needs based on UNEP FI's impact assessment tool. We also considered the 2022 revised version of UNEP FI Impact Radar.

Based on these, we have identified “climate,” “circularity,” and “Availability, accessibility, affordability, quality of resources & services” as key issues.

Based on these first 3 elements of an impact analysis, what positive and negative impact areas has your bank identified? Which (at least two) significant impact areas did you prioritize to pursue your target setting strategy (see 2.2)? Please disclose.

1. Loans to domestic clients: Climate
2. Loans to domestic clients: Availability, accessibility, affordability, quality of resources & services
3. Loans to domestic customers: Climate

**d) For these (min. two prioritized impact areas): Performance measurement:** Has your bank identified which sectors & industries as well as types of customers financed or invested in are causing the strongest actual positive or negative impacts? Please describe how you assessed the performance of these, using appropriate indicators related to significant impact areas that apply to your bank’s context.

In determining priority areas for target-setting among its areas of most significant impact, you should consider the bank’s current performance levels, i.e. qualitative and/or quantitative indicators and/or proxies of the social, economic and environmental impacts resulting from the bank’s activities and provision of products and services. If you have identified climate and/or financial health & inclusion as your most significant impact areas, please also refer to the applicable indicators in the Annex.

If your bank has taken another approach to assess the intensity of impact resulting from the bank’s activities and provision of products and services, please describe this.

The outcome of this step will then also provide the baseline (incl. indicators) you can use for setting targets in two areas of most significant impact.

---

4 Global priorities might alternatively be considered for banks with highly diversified and international portfolios.

5 To prioritize the areas of most significant impact, a qualitative overlay to the quantitative analysis as described in a), b) and c) will be important, e.g. through stakeholder engagement and further geographic contextualisation.
We analyzed climate change risks and identified negative impacts along with the TCFD framework. First, we conducted a quantitative/qualitative analysis of our portfolio and created a risk heat map. Therefore, the physical risks of domestic real estate non-recourse loans, domestic project finance, housing loans, and Shinsei Financial's unsecured personal loans were evaluated in the IPCC Fifth Assessment Report RCP2.6 (2°C scenario)/8.5 (4°C scenario), and analysis of transition risk of lending to the power utility, oil and gas, and shipping sectors based on NGFS Net Zero 2050 (1.5°C scenario), Delayed Transition, and Current Policies, which we thought would have a large impact.
Self-assessment summary:

Which of the following components of impact analysis has your bank completed, in order to identify the areas in which your bank has its most significant (potential) positive and negative impacts?⁶

Scope: ☒ Yes ☐ In progress ☐ No
Portfolio composition: ☒ Yes ☐ In progress ☐ No
Context: ☒ Yes ☐ In progress ☐ No
Performance measurement: ☒ Yes ☐ In progress ☐ No

Which most significant impact areas have you identified for your bank, as a result of the impact analysis?

Climate change mitigation, climate change adaptation, resource efficiency & circular economy, Availability, accessibility, affordability, quality of resources & services

How recent is the data used for and disclosed in the impact analysis?

☒ Up to 6 months prior to publication
☐ Up to 12 months prior to publication
☐ Up to 18 months prior to publication
☐ Longer than 18 months prior to publication

Open text field to describe potential challenges, aspects not covered by the above etc.: (optional)

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⁶ You can respond “Yes” to a question if you have completed one of the described steps, e.g. the initial impact analysis has been carried out, a pilot has been conducted.
2.2 Target Setting (Key Step 2)

Show that your bank has set and published a minimum of two targets which address at least two different areas of most significant impact that you identified in your impact analysis.

The targets have to be Specific, Measurable (qualitative or quantitative), Achievable, Relevant and Time-bound (SMART). Please disclose the following elements of target setting (a-d), for each target separately:

a) **Alignment:** which international, regional or national policy frameworks to align your bank’s portfolio with have you identified as relevant? Show that the selected indicators and targets are linked to and drive alignment with and greater contribution to appropriate Sustainable Development Goals, the goals of the Paris Agreement, and other relevant international, national or regional frameworks.

You can build upon the context items under 2.1.

The Group is working on climate issues based on the TCFD framework.

b) **Baseline:** Have you determined a baseline for selected indicators and assessed the current level of alignment? Please disclose the indicators used as well as the year of the baseline.

You can build upon the performance measurement undertaken in 2.1 to determine the baseline for your target.

A package of indicators has been developed for climate change mitigation and financial health & inclusion to guide and support banks in their target setting and implementation journey. The overview of indicators can be found in the Annex of this template.

If your bank has prioritized climate mitigation and/or financial health & inclusion as (one of) your most significant impact areas, it is strongly recommended to report on the indicators in the Annex, using an overview table like below including the impact area, all relevant indicators and the corresponding indicator codes:

<table>
<thead>
<tr>
<th>Impact area</th>
<th>Indicator code</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Climate change mitigation</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

In case you have identified other and/or additional indicators as relevant to determine the baseline and assess the level of alignment towards impact driven targets, please disclose these.

<table>
<thead>
<tr>
<th>Impact area</th>
<th>Indicator code</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Climate change mitigation</td>
<td>A.3.2</td>
<td>Baseline: fiscal 2021</td>
</tr>
<tr>
<td></td>
<td>A.4.2</td>
<td>Baseline: fiscal 2021</td>
</tr>
</tbody>
</table>
**SMART targets** (incl. key performance indicators (KPIs)\(^9\)): Please disclose the targets for your first and your second area of most significant impact, if already in place (as well as further impact areas, if in place). Which KPIs are you using to monitor progress towards reaching the target? Please disclose.

- Origination of sustainable finance: Cumulative total of JPY 5 trillion by the end of fiscal 2030 (Climate, Availability, accessibility, affordability, quality of resources & services)
- Loan balance for project finance for coal-fired thermal power generation: Zero by the end of fiscal 2040 (Climate)
- Greenhouse gas emissions in the Group’s investment and loan portfolio: Net zero by the end of fiscal 2050 (Climate)


**Action plan:** which actions including milestones have you defined to meet the set targets? Please describe.

Please also show that your bank has analysed and acknowledged significant (potential) indirect impacts of the set targets within the impact area or on other impact areas and that it has set out relevant actions to avoid, mitigate, or compensate potential negative impacts.

- Set KPI for relevant departments and reflect in rewards
- Establish a task force
- In originating sustainable finance, we have formulated a framework that is consistent with relevant domestic and international principles, and the specialized department analyzes and evaluates the target finance, including indirect impacts.

<table>
<thead>
<tr>
<th>Alignment</th>
<th>Yes</th>
<th>In progress</th>
<th>Yes</th>
<th>In progress</th>
<th>Yes</th>
<th>In progress</th>
</tr>
</thead>
</table>

Self-assessment summary

Which of the following components of target setting in line with the PRB requirements has your bank completed or is currently in a process of assessing for your…

<table>
<thead>
<tr>
<th>... first area of most significant impact: ... (Climate)</th>
<th>... second area of most significant impact: ... (Availability, accessibility, affordability, quality of resources &amp; services)</th>
<th>(If you are setting targets in more impact areas) ... your third (and subsequent) area(s) of impact: ... (please name it)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alignment</td>
<td>☒ Yes</td>
<td>☐ Yes</td>
</tr>
<tr>
<td></td>
<td>□ In progress</td>
<td>□ In progress</td>
</tr>
</tbody>
</table>

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| 7 Operational targets (relating to for example water consumption in office buildings, gender equality on the bank’s management board or business-trip related greenhouse gas emissions) are not in scope of the PRB. |
| 8 Your bank should consider the main challenges and priorities in terms of sustainable development in your main country/ies of operation for the purpose of setting targets. These can be found in National Development Plans and strategies, international goals such as the SDGs or the Paris Climate Agreement, and regional frameworks. Aligning means there should be a clear link between the bank’s targets and these frameworks and priorities, therefore showing how the target supports and drives contributions to the national and global goals. |
| 9 Key Performance Indicators are chosen indicators by the bank for the purpose of monitoring progress towards targets. |
### 2.3 Target implementation and monitoring (Key Step 2)

**For each target separately:**

Show that your bank has implemented the actions it had previously defined to meet the set target.

Report on your bank’s progress since the last report towards achieving each of the set targets and the impact your progress resulted in, using the indicators and KPIs to monitor progress you have defined under 2.2.

*Or, in case of changes to implementation plans (relevant for 2nd and subsequent reports only):* describe the potential changes (changes to priority impact areas, changes to indicators, acceleration/review of targets, introduction of new milestones or revisions of action plans) and explain why those changes have become necessary.

- Origination of sustainable finance: JPY 451.3 billion
- Loan balance for project finance for coal-fired thermal power generation: reduced to JPY 41 billion from JPY 50 billion
Principle 3: Clients and Customers

We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.

3.1 Client engagement

*Does your bank have a policy or engagement process with clients and customers\(^\text{10}\) in place to encourage sustainable practices?*

- ☒ Yes
- ☐ In progress
- ☐ No

*Does your bank have a policy for sectors in which you have identified the highest (potential) negative impacts?*

- ☒ Yes
- ☐ In progress
- ☐ No

Describe how your bank has worked with and/or is planning to work with its clients and customers to encourage sustainable practices and enable sustainable economic activities\(^\text{11}\). It should include information on relevant policies, actions planned/implemented to support clients' transition, selected indicators on client engagement and, where possible, the impacts achieved.

This should be based on and in line with the impact analysis, target-setting and action plans put in place by the bank (see P2).

The Bank Group has established a “Responsible Investment and Lending Policy” and prohibits new investment and lending transactions for the construction of new coal-fired thermal power plants. This is consistent with the identification of "climate change-related fields in the corporate investment and loan business in Japan" in the impact analysis.

When making new investments, we work with our clients to identify negative environmental and social impacts based on this policy and the Equator Principles. In addition, we have established a system for evaluating sustainable impact in-house. Sustainable Impact Development Division of SBI Shinsei Bank works with each department to develop and implement sustainable finance as well as provide business support to customers that contribute to resolving climate change. For developing and implementing sustainable finance, we formulated the Shinsei Green Finance Framework and the Shinsei Sustainability Linked Loan Framework, consistent with principles in and outside of Japan, such as the Green Loan Principles and the Sustainability Linked Loan Principles. The Sustainable Impact Assessment Department, part of the Sustainable Impact Development Division, assesses the suitability of the finance within this framework. Under such a system, we are promoting

Responsible Investment and Lending Policy
sustainable finance with the goal of originating a total of JPY 5 trillion by the end of fiscal 2030.

### 3.2 Business opportunities
Describe what strategic business opportunities in relation to the increase of positive and the reduction of negative impacts your bank has identified and/or how you have worked on these in the reporting period. Provide information on existing products and services, information on sustainable products developed in terms of value (USD or local currency) and/or as a % of your portfolio, and which SDGs or impact areas you are striving to make a positive impact on (e.g. green mortgages – climate, social bonds – financial inclusion, etc.).

As a banking group, we believe that sustainable finance has the greatest impact on increasing positive impacts and reducing negative impacts. We have set a goal of organizing a cumulative total of JPY 5 trillion by the end of fiscal 2030, and have arranged JPY 451.3 billion in fiscal 2022. Green Loans primarily strive to have a positive impact in the climate, and Social Loans primarily in the availability, accessibility, affordability, quality of resources & services impact areas.

In addition, we believe that cooperation with customers can also be an opportunity to solve environmental and social issues, so we have launched “Sustainability Deposits,” which are limited to the use of funds for sustainability-related investments and loans, for retail banking customers.

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### Principle 4: Stakeholders

We will proactively and responsibly consult, engage and partner with relevant stakeholders to achieve society’s goals.

### 4.1 Stakeholder identification and consultation
*Does your bank have a process to identify and regularly consult, engage, collaborate and partner with stakeholders (or stakeholder groups) you have identified as relevant in relation to the impact analysis and target setting process?*

<table>
<thead>
<tr>
<th>Yes</th>
<th>In progress</th>
<th>No</th>
</tr>
</thead>
</table>

---

10 A client engagement process is a process of supporting clients towards transitioning their business models in line with sustainability goals by strategically accompanying them through a variety of customer relationship channels.

11 Sustainable economic activities promote the transition to a low-carbon, more resource-efficient and sustainable economy.

12 Such as regulators, investors, governments, suppliers, customers and clients, academia, civil society institutions, communities, representatives of indigenous population and non-profit organizations
Please describe which stakeholders (or groups/types of stakeholders) you have identified, consulted, engaged, collaborated or partnered with for the purpose of implementing the Principles and improving your bank’s impacts. This should include a high-level overview of how your bank has identified relevant stakeholders, what issues were addressed/results achieved and how they fed into the action planning process.

| The Group Sustainability Management Policy sets forth the basic concept of stakeholder engagement. It is essential to co-create value with stakeholders, including customers, partners (suppliers, suppliers, subcontractors, business partners, and business partners), employees, local communities, governments, shareholders and investors, and other for-profit and non-profit organizations. Through constructive dialogue with stakeholders (engagement), we will constantly review the Group's sustainability management and promote value-added initiatives for stakeholders. | Group Sustainability Management Policy [https://corp.sbishinsei.bank.co.jp/en/sustainability/policy/management.html](https://corp.sbishinsei.bank.co.jp/en/sustainability/policy/management.html) |
**Principle 5: Governance & Culture**

We will implement our commitment to these Principles through effective governance and a culture of responsible banking.

### 5.1 Governance Structure for Implementation of the Principles

Does your bank have a governance system in place that incorporates the PRB?  
☐ Yes ☐ In progress ☐ No

Please describe the relevant governance structures, policies and procedures your bank has in place/is planning to put in place to manage significant positive and negative (potential) impacts and support the effective implementation of the Principles. This includes information about:

- which committee has responsibility over the sustainability strategy as well as targets approval and monitoring (including information about the highest level of governance the PRB is subjected to),
- details about the chair of the committee and the process and frequency for the board having oversight of PRB implementation (including remedial action in the event of targets or milestones not being achieved or unexpected negative impacts being detected), as well as
- remuneration practices linked to sustainability targets.

We have appointed a chief sustainability officer (CSO) and sustainability officers (SO), as well as established the Group Sustainability Committee as one of the Group’s most important committees, which is held almost monthly. The committee reports on sustainability management to the Board of Directors and the Group Executive Committee almost quarterly, and resolves important matters.

### 5.2 Promoting a culture of responsible banking:

Describe the initiatives and measures of your bank to foster a culture of responsible banking among its employees (e.g., capacity building, e-learning, sustainability trainings for client-facing roles, inclusion in remuneration structures and performance management and leadership communication, amongst others).

- lectures and webinars from experts on sustainability
- periodic publication of sustainability communications, including intra-group initiatives and SDGs explanations
- hands-on training using games
- participatory events for employees to boost the momentum of promoting sustainability and understand sustainability
- SBI Shinsei Bank Group Sustainability Website: publication to outside the group

### 5.3 Policies and due diligence processes

Does your bank have policies in place that address environmental and social risks within your portfolio? Please describe.
Please describe what due diligence processes your bank has installed to identify and manage environmental and social risks associated with your portfolio. This can include aspects such as identification of significant/salient risks, environmental and social risks mitigation and definition of action plans, monitoring and reporting on risks and any existing grievance mechanism, as well as the governance structures you have in place to oversee these risks.

We have established a “Responsible Investment and Lending Policy” and have identified sectors where investment and lending are prohibited or given consideration. We have established a system that prior to transactions, we confirm whether the business is prohibited or subject to consideration, and the implementation status of initiatives that consider the environment and society of our clients, based on public information and information provided by the clients.

<table>
<thead>
<tr>
<th>Self-assessment summary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Does the CEO or other C-suite officers have regular oversight over the implementation of the Principles through the bank's governance system?</td>
</tr>
<tr>
<td>☒ Yes</td>
</tr>
<tr>
<td>Does the governance system entail structures to oversee PRB implementation (e.g. incl. impact analysis and target setting, actions to achieve these targets and processes of remedial action in the event targets/milestones are not achieved or unexpected neg. impacts are detected)?</td>
</tr>
<tr>
<td>☒ Yes</td>
</tr>
<tr>
<td>Does your bank have measures in place to promote a culture of sustainability among employees (as described in 5.2)?</td>
</tr>
<tr>
<td>☒ Yes</td>
</tr>
</tbody>
</table>

---

13 Applicable examples of types of policies are: exclusion policies for certain sectors/activities; zero-deforestation policies; zero-tolerance policies; gender-related policies; social due diligence policies; stakeholder engagement policies; whistle-blower policies etc., or any applicable national guidelines related to social risks.
**Principle 6: Transparency & Accountability**

We will periodically review our individual and collective implementation of these Principles and be transparent about and accountable for our positive and negative impacts and our contribution to society’s goals.

### 6.1 Assurance

Has this publicly disclosed information on your PRB commitments been assured by an independent assurer?

- [ ] Yes
- [ ] Partially
- [x] No

If applicable, please include the link or description of the assurance statement.

### 6.2 Reporting on other frameworks

Does your bank disclose sustainability information in any of the listed below standards and frameworks?

- [ ] GRI
- [ ] SASB
- [x] CDP
- [ ] IFRS Sustainability Disclosure Standards (to be published)
- [x] TCFD
- [ ] Other: ….

We respond to the CDP survey every year. In our integrated report, we disclose information in accordance with the TCFD framework.

Awards and Accreditation


Integrated Report 2023 P38-44, 75


### 6.3 Outlook

What are the next steps your bank will undertake in next 12 month-reporting period (particularly on impact analysis\(^\text{14}\), target setting\(^\text{15}\) and governance structure for implementing the PRB)? Please describe briefly.

To be determined

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\(^{14}\) For example outlining plans for increasing the scope by including areas that have not yet been covered, or planned steps in terms of portfolio composition, context and performance measurement

\(^{15}\) For example outlining plans for baseline measurement, developing targets for (more) impact areas, setting interim targets, developing action plans etc.
6.4 Challenges

Here is a short section to find out about challenges your bank is possibly facing regarding the implementation of the Principles for Responsible Banking. Your feedback will be helpful to contextualise the collective progress of PRB signatory banks.

What challenges have you prioritized to address when implementing the Principles for Responsible Banking? Please choose what you consider the top three challenges your bank has prioritized to address in the last 12 months (optional question).

If desired, you can elaborate on challenges and how you are tackling these:

☐ Embedding PRB oversight into governance
☒ Gaining or maintaining momentum in the bank
☐ Getting started: where to start and what to focus on in the beginning
☐ Conducting an impact analysis
☒ Assessing negative environmental and social impacts
☐ Choosing the right performance measurement methodology/ies
☐ Setting targets
☐ Other: …

If desired, you can elaborate on challenges and how you are tackling these:
Annex

A set of indicators has been produced for the impact areas of climate mitigation and financial health & inclusion. These indicators will support you in your reporting and in showing progress against PRB implementation. Banks are expected to set targets that address minimum two areas of most significant impact within the first four years after signing the PRB. That means that Banks should ultimately set targets using impact indicators. Acknowledging the fact that banks are in different stages of implementation and on different levels of maturity and therefore might not be able to report on impact from the beginning, a Theory of Change approach has been used to develop the set of indicators below.  

The Theory of Change shows the pathway to impact and considers the relationship between inputs, actions, outputs, and outcomes in order to achieve impact. The Theory of Change for climate mitigation can be found [here](#), the Theory of Change for financial health & inclusion can be found [here](#).

**How to use**: Both practice (action, outcome and output) and impact performance need to be understood because practice is the conduit for achieving desired impacts (including targets). The Theory of Change allows to identify metrics and set targets which align with a bank’s maturity. The indicators below are all connected to a bank’s impact and can be considered as steps towards measuring impact. Some of the practice indicators (on the action, output, and outcome levels respectively) are connected to portfolio composition and financial targets\(^\text{17}\) (highlighted in green) or to client engagement\(^\text{18}\) targets (highlighted in blue), which enable your overall target. If your bank has prioritized climate mitigation and/or financial health & inclusion as (one of) your most significant impact areas, it is strongly recommended to report on the indicators in the Annex to measure your performance and baseline.\(^\text{19}\) Once you have set the target, you can use the indicators as guidance for your action plan as well as defining Key Performance Indicators (KPIs) which you can then use to measure progress against the set targets.

\(^\text{16}\) It is not required from banks to work with the Theory of Change concept internally. In fact, the Theory of Change has been used to structure the requirements of setting SMART targets using relevant indicators.  

\(^\text{17}\) Financial targets also aim for real economy outcomes but are not directly expressed as such. Instead, they are expressed with financial indicators and metrics, e.g., to redirect flows of lending and investments to sectors, activities or projects aligned with SDGs and/or related to the selected impact area. Banks can also set financial targets related to specific types of customers e.g., low-income customers or female entrepreneurs.  

\(^\text{18}\) Client engagement targets involve engaging relevant clients and customers to enable your overall target. The purpose of client engagement is to support clients towards transitioning their business models in line with sustainability goals by strategically accompanying them through a variety of customer relationship channels.  

\(^\text{19}\) You might not be able to report on all indicators and/or levels of practice (i.e. from left to right), in which case you should report on all applicable indicators on the respective level of practice no matter if it is an action, output or outcome indicator.
For Signatories of the Net-Zero Banking Alliance: please report on the climate targets set as required in the Guidelines for Climate Target Setting. As a member of the Alliance, you are required to publish first 2030 targets for priority sectors within 18 months and further sectoral targets within 36 months after signing. You can use the PRB template to disclose the required climate target information if its publication date is in line with the committed NZBA timeframe.

For Signatories of the Collective Commitment to Financial Health & Inclusion: please report on financial health and/or financial inclusion targets set as required in the Financial Health and Inclusion Commitment Statement. As a signatory to the Commitment, you have agreed to set a SMART ambitious target within 18 months after signing. To facilitate your process, please refer to the Guidance on Target Setting for Financial Health and Inclusion and the Core Indicators to measure financial health and inclusion. Keep in mind that signatories of the Commitment are encouraged to measure as many indicators as possible from the Core Set or their equivalent to be able to set a SMART impact driven target.
### Practice: the bank’s portfolio composition in terms of key sectors, its client engagement, and its relevant policies and processes, and, if applicable, its advocacy practices

### Impact: the actual impact of the bank’s portfolio

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<table>
<thead>
<tr>
<th>Impact area</th>
<th>Practice (pathway to impact)</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Climate change mitigation</td>
<td></td>
</tr>
<tr>
<td><strong>A.1.1 Climate strategy:</strong> Does your bank have a climate strategy in place?</td>
<td>Yes / In progress / No</td>
</tr>
<tr>
<td><strong>A.1.2 Paris alignment target:</strong> Has your bank set a long-term portfolio-wide Paris-alignment target? To become net zero by when?</td>
<td>Yes / In progress / No; If yes: please specify: to become net zero by when? - Emissions baseline / base year: What is the emissions baseline / base</td>
</tr>
<tr>
<td><strong>A.2.1 Client engagement process:</strong> Is your bank in an engagement process with clients regarding their strategy towards a low(er)-carbon business model (for business clients), or towards low(er)-carbon practices (for retail clients)?</td>
<td>Yes / Setting it up / No; If yes: Please specify for which clients (types of clients, sectors, geography, number of clients etc.)</td>
</tr>
<tr>
<td><strong>A.2.2 Absolute financed emissions:</strong> What are your absolute emissions (financed emissions = scope 3, category 15) in your lending and/or total GHG emissions or CO₂e (please also disclose what is excluded for now and why)</td>
<td></td>
</tr>
<tr>
<td><strong>A.3.1 Financial volume of green assets/low-carbon technologies:</strong> How much does your bank lend to/invest in green assets / loans and low-carbon activities and technologies?</td>
<td>bln/mn USD or local currency, and/or % of portfolio; please specify the definition of green assets and low-carbon technologies used</td>
</tr>
<tr>
<td><strong>A.3.2 Financial volume lent to / invested in carbon intensive sectors and activities and transition finance:</strong> How much does your bank lend to / invest in carbon-intensive sectors and activities and transition finance?</td>
<td></td>
</tr>
<tr>
<td><strong>A.4.1 Reduction of GHG emissions:</strong> How much have the GHG emissions financed been reduced?</td>
<td>% over time; baseline and tracking GHG emissions in kg of CO₂e (or applicable metrics)</td>
</tr>
<tr>
<td><strong>A.4.2 Portfolio alignment:</strong> How much of your bank’s portfolio is aligned with Paris (depending on the target set [A.1.2] either 1.5 or 2 degrees)?</td>
<td>% of portfolio (please specify which portfolio; for corporate and business clients: % of sectors financed)</td>
</tr>
</tbody>
</table>

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20 Practice: the bank’s portfolio composition in terms of key sectors, its client engagement, and its relevant policies and processes, and, if applicable, its advocacy practices

21 Impact: the actual impact of the bank’s portfolio

22 If possible and/or necessary, please contextualize the progress: Greenhouse gas emissions might even increase initially because the scope of measurements is extended and financed emissions from a growing proportion of the portfolio are measured, emission factors are updated etc. Emission reductions made by the clients should over time lead to a decrease in GHG emissions financed.
<table>
<thead>
<tr>
<th>A.1.3 Policy and process for client relationships: has your bank put in place rules and processes for client relationships (both new clients and existing clients), to work together towards the goal of transitioning the clients' activities and business model?</th>
<th>Yes / In progress / No</th>
<th>A.2.3 Sector-specific emission intensity (per clients' physical outputs or per financial performance): What is the emission intensity within the relevant sector?</th>
<th>Please specify which sector (depending on the sector and/or chosen metric): kg of CO₂e/kWh, CO₂e/m², kg of CO₂e/USD invested, or kg of CO₂e/revenue or profit</th>
</tr>
</thead>
<tbody>
<tr>
<td>A.1.4 Portfolio analysis: Has your bank analyzed (parts of) its lending and/or investment portfolio in terms of financed emissions (Scope 3, category 15); technology mix or carbon-intensive sectors in the portfolio?</td>
<td>Yes / In progress / No; If yes: please specify which parts of the lending and investment portfolio you have analyzed</td>
<td>A.2.4 Proportion of financed emissions covered by a decarbonization target: What proportion of your bank's financed emissions is covered by a decarbonization target, i.e. stem from clients with % (denominator: financed emissions in scope of the target set)</td>
<td>---</td>
</tr>
</tbody>
</table>

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23 A list of carbon-intensive sectors can be found in the Guidelines for Climate Target Setting.

24 Transition finance is defined as financing the transition towards a low-carbon future in alignment with the Paris climate goals. It entails any form of financial support for non-pure play green activities to become greener and reduce emissions.
## A. Financial health

### A.1.5 Business opportunities and financial products:

Has your bank developed financial products tailored to support clients’ and customers’ reduction in GHG emissions (such as energy efficient mortgages, green loans, green bonds, green securitisations etc.)?

| Yes / In progress / No; Please specify which ones, and what financial volume and/or % of the portfolio they account for | a transition plan in place? |

### B. Financial health

#### B.1.1 # of products and services in the portfolio with a focus on financial health

Internal data based. Measures how many of the products and services in the portfolio have a financial health focus. We deem a product or service to have this focus when it facilitates decision making and supports financial health increase based on our definition of financial health. This covers products and services embedded with nudges to simplify decision making, round-up, high yield savings accounts, easy investment tools, etc.

#### B.2.1 # of individuals supported with dedicated and effective financial and/or digital education initiatives

Based on internal data. Measures the number of users (customers and non-customers) of financial and/or digital skills-building initiatives offered by the bank. An initiative encompasses courses, programs, training videos, articles, SMS education campaigns, etc. Dedicated means that the initiative was specially created for a defined group of individuals (in many cases a prioritized group). Effective

#### B.3.1 % of individuals with a good and/or very good level of financial skills

Assessment based. Measures the percentage of individuals with a good and/or very good level of financial skills according to the assessment chosen by the financial institution. Should be measured on individuals benefiting from the bank’s financial education initiatives.

#### B.4.1 % of customers with a high level of financial health

Survey and/or transactional data based. Measures the percentage of customers with a high level of financial health according to the score chosen by the financial institution.
means that the bank has measured if the initiative is successful in generating the desired results of stronger financial skills, and thus, any individual that is supported with the initiative will achieve the desired results. A bank can't count a click as an individual so we encourage that the data is presented as # of individuals for deanonymized users and # of interactions for anonymized users.

B.1.2 % of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health

Based on internal data. Measures the percentage of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health. Including training to attend the needs of prioritized groups. Effective means that the bank has measured if the initiative is successful in generating the desired results of

B.2.2 % of customers actively using the online/mobile banking platform/tools

Transactional data based. Measures the percentage of customers logging in, at least once a month, to one of the following digital platforms (measure those applicable for your bank): Online internet banking and/or mobile phone banking and/or digital tools (including

B.3.2 % of customers who use the bank's services to create a financial action plan with the bank

Transactional and/or survey data based. Measures the percentage of customers who create a financial action plan with the bank using the bank’s services. A financial action plan is anything that helps the customer build financial resilience. It is done "with the bank" if the bank can visualize,

B.4.2 % of customers for which spending exceeded 90% of inflows for more than 6 months last year

Survey and/or transactional data based. Measures the percentage of customers with a transaction account and/or savings/investment accounts for which spending exceeded 90% of inflows for more than 6 months in the year within the reporting period compared to the total of customers within PRB scope. Focus on main
stronger skills, and thus, any individual that is supported with the initiative will achieve the desired results. Relevant employees are those the bank prioritizes in the training program due to their direct impact on the customers’ financial health.

Relevant employees are those the bank prioritizes in the training program due to their direct impact on the customers’ financial health.

| B.1.3 | # of partnerships active to achieve financial health and inclusion targets | Based on internal data. Measures the number of partnerships currently active to achieve financial health and inclusion targets. By active we mean that are currently undergoing actions and generating results. We suggest disclosing the results of the partnerships in the commentary of the reports. | B.3.3 | % of customers using overdraft regularly | Transactional data based. Measures the percentage of customers using the overdraft option in their accounts or credit cards, regularly. Overdraft can be used to handle unexpected emergencies but more than 1/3 of the year (banks may deviate if proper reasons are provided) denotes regularity and a precursor to lower financial health. |
| B.3.4 | % of customers with a non-performing loan | Transactional data based. Measures the percentage of customers with past-due loans (“past due”) | B.4.3 | % of customers that feel confident about their financial situation in the next 12 months | Survey based data. Measures the percentage of customers that answered positively to feeling confident about their financial situation in the next 12 months compared to the total number of customers surveyed. By confident we mean not feeling worried about their financial situation. |
| B.4.4 | % of customers with products connected to long-term saving and investment plans | Transactional and/or survey data based. Measures the percentage of customers with products connected to long-term saving and investment plans.
| B.3.5 | % of customers showing an increase or stable amounts in savings, deposit and/or investment account balances, quarter on quarter. | Transactional data based. Measures the percentage of customers showing an increase or stable amounts in savings and/or deposit AND/OR investment accounts balances, quarter on quarter. | B.4.5 | % of customers that would struggle to raise emergency funds or cover with insurance a major unexpected expense | Survey based data. Measures the percentage of customers that would struggle to raise emergency funds or cover with insurance a major unexpected expense. We consider a major unexpected expense, one that the customer hadn’t planned for and would require them to spend more than what they have available for secondary expenses in their monthly budget or 1/20th of the country’s Gross National Income (banks may deviate if proper reasons are provided). A good example is: unforeseen medical bills, large appliance malfunctioning, car repair, etc. |
| C. Financial Inclusion | C.1.1 | # of products and services in the portfolio with a focus on financial inclusion | Internal data based. Measures how many of the products and services in the portfolio have a financial inclusion focus. We deem a product or service to have this focus when its design facilitates the access and usage by the prioritized customer. For example, no-fee savings account, low interest microloan, offline access or sim-based banking apps, etc. | C.2.1 | # of individuals supported with dedicated and effective financial and/or digital education initiatives | Based on internal data. Measures the number of users (customers and non-customers) of financial and/or digital skills-building initiatives offered by the bank. An initiative encompasses courses, programs, training videos, articles, SMS education campaigns, etc. Dedicated means that the initiative was specially created for a defined group of individuals (in many cases a prioritized group). Effective means that the initiative is facilitating the access and usage by the prioritized customer. | C.3.1 | % of individuals with a good and/or very good level of financial skills | Assessment based. Measures the percentage of individuals with a good and/or very good level of financial skills according to the assessment chosen by the financial institution. Should be measured on individuals benefiting from the bank's financial education initiatives. | C.4.1 | % of customers with 2 or more active financial products, from different categories, with the bank | Transactional data based. Measures the percentage of customers with 2 or more active financial products, from different categories, with the bank. By active we mean there's at least one usage per month. By category we mean credit/debt, savings/deposit/payment, insurance, investment, etc. Once a target has been set for this indicator, we encourage banks to ensure responsible selling policies or other initiatives so that the target doesn't become a toxic incentive. |

Using the question: "If a major unexpected expense arises, how can you cover it right now?" and give the multiple choice options of insurance, emergency funds, loan, credit card, family/friends, etc.
| C.1.2 | % of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health | Based on internal data. Measures the percentage of relevant employees supported with effective training on financial inclusion, responsible credit and/or financial health. Including training to attend the needs of prioritized groups. Effective means that the bank has measured if the initiative is successful in generating the desired results of stronger skills, and thus, any individual that is supported with the initiative. |
| C.2.2 | % of customers with effective access to a basic banking product | Transactional data based. Measures the percentage of customers with effective access to a basic banking product. By effective we mean the usage beyond first access. Basic banking products vary by bank. Good examples are: checking accounts, payment accounts, credit cards, saving accounts, deposit accounts, e- |
| C.3.2 | % of customers supported with dedicated customer journey/advisory services | "Transactional data based. Where dedicated customer journey/advisory services are in place for prioritized groups, this indicator measures the percentage of customers using such services. Depending on size of bank, either number or percentage can be the unit of measure." |
will achieve the desired results. Relevant employees are those the bank prioritizes in the training program due to their direct impact on the customers' financial health.

C.1.3 # of partnerships active to achieve financial health and inclusion targets

Based on internal data. Measures the number of partnerships currently active to achieve financial health and inclusion targets. By active we mean that are currently undergoing actions and generating results. We suggest disclosing the results of the partnerships in the commentary of the reports.

C.2.3 # of new customers per month

Transactional data based. Measures the number of new customers per month. Once the bank sets a target, this indicator can become a KPI to measure the percentage of new customers from the prioritized groups, per month.

C.3.3 % of customers actively using the online/mobile banking platform/tools

Transactional data based. Measures the percentage of customers logging in, at least once a month, to one of the following digital platforms (measure those applicable for your bank): Online internet banking and/or mobile phone banking and/or digital tools (including financial health tools, if applicable).