



European Bank
for Reconstruction and Development

Environmental and social management system – external reporting by financial intermediaries

Environmental and social risk management
toolkit for financial intermediaries

June 2026

Introduction

Financial intermediaries (FIs) are required to comply with Environmental and Social Requirements (ESRs) 2, 4 and 9 of the EBRD [Environmental and Social Policy](#) (ESP). As part of ESR 9, the FI is required to put in place a comprehensive system for effective communication with and reporting to internal and external stakeholder groups. This includes maintaining internal and external channels of communication, data management, and reporting systems and processes.

Reporting objectives

FIs are expected to promote two-way communication with their stakeholders to build and maintain trust, foster transparency and comply with national reporting requirements. In the absence of the latter, they should adopt voluntary reporting frameworks as international best practice. FIs are required to publish their corporate environmental and social (E&S) policy and strategy and/or a summary of their environmental and social management system (ESMS) on their website and to establish a mechanism for stakeholders to provide feedback to the FI, including grievances.

To align with international best practice, FIs can issue annual ESG and/or sustainability reports based on internationally accepted reporting frameworks, such as the International Sustainability Standards Board's IFRS S1 and IFRS S2, applied where adopted by the relevant jurisdiction or used voluntarily, or, where applicable, the European Union (EU)'s Corporate Sustainability Reporting Directive (CSRD) and European Sustainability Reporting Standards (ESRS). For capital market transactions between FIs and the EBRD, these types of report may also be acceptable for EBRD annual E&S reporting. For further details, see the briefing note on reporting to the EBRD.

When issuing such annual reports, FIs should adhere to the following principles:

- outline the framework used and corporate E&S aims and objectives
- report on material E&S issues
- identify key performance indicators (KPIs) that track performance on these issues
- set performance targets and report against them
- ensure reporting is balanced and reflects positive and negative aspects
- be consistent – select, compile and report information in a timely manner
- report accurately and outline assurance process.

Regulatory and voluntary reporting requirements

The FI may be legally required to disclose material E&S information to a regulator or other stakeholders. FIs in regulated capital markets may also be required to submit annual E&S information on material issues to investors and stakeholders under national and/or European regulatory requirements, such as the EU CSRD and the EU Sustainable Finance Disclosure Regulation (SFDR).¹ FIs should set out which national reporting requirements apply to their business and how they have complied with them. Further information on relevant regulatory requirements can be found on the Invest Europe website.²

¹ See European Union (2023).

² See Invest Europe (n.d.).

There are several frameworks for reporting on ESG issues that FIs may wish to consider. These include:

Overall E&S reporting frameworks:

- [IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information and IFRS S2 Climate-related Disclosures](#), which is applied with IFRS S1 and incorporates the recommendations of the former Task Force on Climate-related Financial Disclosures (TCFD)
- the [CSRD](#) and relevant [ESRS](#), where applicable
- [Global Reporting Initiative \(GRI\) Standards](#)
- the [United Nations Principles for Responsible Banking](#)
- the [Equator Principles](#)

Specific environmental reporting frameworks:

- [Taskforce on Nature-related Financial Disclosures \(TNFD\)](#)
- [Science-Based Targets Initiative standards](#)

Specific social reporting frameworks:

- [United Nations Guiding Principles on Business and Human Rights](#)
- [International Labour Organization standards](#)

Examples of country-level reporting regulations

Poland

Poland has implemented the EU CSRD via domestic legislation. The Warsaw Stock Exchange – Poland's main securities exchange – has best-practice requirements for firms on ESG disclosure.³

Best practice includes specific requirements that companies integrate ESG factors into their business strategy, in particular:

- environmental factors, including measures and risks relating to climate change and sustainable development

- social and employee factors, including, actions taken and planned to ensure the equal treatment of women and men, decent working conditions, respect for employees' rights, dialogue with local communities and good customer relations.

Georgia

The National Bank of Georgia (NBG)'s Corporate Governance Code for Commercial Banks sets out requirements for ESG reporting and disclosure.⁴ This includes a detailed set of reporting and disclosure principles, operationalised through a standardised ESG Reporting and Disclosure Template that commercial banks complete annually, with reports available on the NBG website.⁵

Specific requirements include:

- In accordance with the Corporate Governance Code, all commercial banks that operate in Georgia are required to disclose material ESG information.
- ESG disclosure in Georgia considers all three elements – environmental, social and governance – if they are deemed material to the reporting entity's businesses and stakeholders. More specific ESG issues covered may include, but are not limited to: human rights; employment and industrial relations; protection of the environment (including climate change); combating bribery, bribe solicitation and extortion; and consumer interests and disclosure.
- Entities that report on ESG issues relating to their own businesses and stakeholders should consider, among other things, the directions in which the government plans to develop its policy frameworks for sustainable development. Georgia finalised the nationalisation of the UN Sustainable Development Goals (SDGs) in 2019, adopting all 17 goals with nationally prioritised targets and indicators tailored to the country's development context.

³ See Warsaw Stock Exchange and EBRD (2023).

⁴ See National Bank of Georgia (2021).

⁵ See National Bank of Georgia (n.d.).

Ukraine

In November 2021, the National Bank of Ukraine (NBU) presented its Sustainable Finance Development Policy 2025,⁶ which set out “a detailed description of tasks and new instruments to bring practices applied by Ukrainian financial institutions closer to the best global standards of integrating environmental, social, and governance (ESG) criteria into financial services”. The policy originally envisaged mandatory disclosure by FIs of the sustainability of their activities, their environmental impact, and related reputational and financial risks, with disclosure recommendations to be developed by the NBU by the end of 2023 for banks and by the end of 2024 for non-bank financial institutions. These targets have since evolved into more concrete requirements. In 2025, the NBU published a white paper on ESG risk management, setting out a phased approach that requires banks to embed ESG risk management, including environmental and social risks, into their governance between 2025 and 2027, with this requirement extended to other public-interest financial institutions from 2026.⁷ This was operationalised through NBU Board Decision No. 31 (February 2026), which amended banks’ corporate governance recommendations so that they now require sustainability strategies that address environmental and social responsibilities – alongside economic and managerial responsibilities – and the introduction of ESG client-risk-assessment procedures, with implementation of internal sustainability documents recommended by 31 July 2026.⁸

Egypt

Since 2021, Egypt’s Financial Regulatory Authority has required companies listed on the Egyptian Exchange (EGX), as well as non-bank financial services (NBFS) companies with issued capital of at least EGP 100 million, to publicly disclose their performance on key ESG metrics annually, as an annex to their board of directors’ report, submitted alongside annual financial statements.⁹ Companies with issued capital of at least EGP 500 million face an additional requirement to disclose climate-related financial information aligned with the Task Force on Climate-related Financial Disclosures (TCFD). The Egyptian Exchange has produced Model Guidance for Reporting on ESG Performance & SDGs.¹⁰ This guidance relies on the GRI principles and guidance for ESG disclosure and provides the following recommended KPIs for environmental and social issues:

Environmental:

- climate change disclosures, such as business or legal developments related to climate change mitigation or adaptation that may have an impact on the organisation
- biodiversity management
- environmental management systems.

Social:

- labour practices and relations
- diversity and inclusion
- programmes and practices to assess and manage the impacts of operations on local communities, and product responsibility policies and practices.

6 See National Bank of Ukraine (2021).

7 See National Bank of Ukraine (2025).

8 See National Bank of Ukraine (2026).

9 See Financial Regulatory Authority (2021).

10 See Egyptian Exchange (2019).

References

European Commission (2023), Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards, Brussels. Available at: <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:32023R2772>.

European Union (2022), Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting, Brussels. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32022L2464>.

European Union (2023), Sustainable Finance Disclosures Regulation (SFDR), Brussels. Available at: https://finance.ec.europa.eu/regulation-and-supervision/financial-services-legislation/implementing-and-delegated-acts/sustainable-finance-disclosures-regulation_en.

Financial Regulatory Authority (2021), Decree on mandatory ESG disclosure for EGX-listed and NBFS companies. Available at: <https://sseinitiative.org/all-news/egyptian-fra-issued-mandatory-esg-and-climate-disclosure>.

Egyptian Exchange (2019), The Egyptian Exchange: Model Guidance for Reporting on ESG Performance & SDGs, Cairo. Available at: [egx-esg-information-reporting-guidance_english_english.pdf](https://www.egx-egypt.com/egx-esg-information-reporting-guidance_english_english.pdf).

IFRS (2023a), *IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information*, London. Available at: <https://www.ifrs.org/issued-standards/ifrs-sustainability-standards-navigator/ifrs-s1-general-requirements>.

IFRS (2023b), *IFRS S2 Climate-related Disclosures*, London. Available at: <https://www.ifrs.org/issued-standards/ifrs-sustainability-standards-navigator/ifrs-s2-climate-related-disclosures>.

Invest Europe (n.d.), Invest Europe ESG reporting guidelines, Brussels. Available at: <https://www.investeurope.eu/invest-europe-esg-reporting-guidelines/introduction>.

National Bank of Georgia (n.d.), ESG Reporting and Disclosure, Tbilisi. Available at: <https://nbg.gov.ge/en/financial-stability/esg-reporting-and-disclosure>.

National Bank of Georgia (2021), “The National Bank of Georgia Amends the Corporate Governance Code for Commercial Banks to Better Address ESG Issues”, Tbilisi. Available at: <https://nbg.gov.ge/en/media/news/the-national-bank-of-georgia-amends-the-corporate-governance-code-for-commercial-banks-to>.

National Bank of Ukraine (2021), *NBU Sustainable Finance Development Policy*, Kyiv. Available at: https://bank.gov.ua/admin_uploads/article/Policy_rozvytok-stalogo-finansuvannja_2025_en.pdf?v=4.

National Bank of Ukraine (2025), *White Paper on Managing Environmental, Social, and Governance (ESG) Risks in the Financial Sector*, Kyiv. Available at: https://bank.gov.ua/en/file/download?file=Bila_knyga_2025_fin_eng.pdf.

National Bank of Ukraine (2026), Sustainable Development of the Financial Sector (including NBU Board Decision No. 31: On the Approval of Amendments to the Methodological Recommendations on Corporate Governance in Ukrainian Banks), Kyiv. Available at: <https://bank.gov.ua/en/about/develop-strategy/esg>.

Warsaw Stock Exchange and EBRD (2023), *ESG Reporting Guidelines: Guide for Issuers*, Warsaw. Available at: https://www.gpw.pl/pub/GPW/ESG/ESG_Reporting_Guidelines.pdf.

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June 2026

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