Environmental and Social Policy Development Best Practice for Financial Institutions December 2015







- Welcome & Introduction to the session
- What is an E&S policy and why is it needed?
- Key consideration when developing an E&S policy
- Best practice elements
- Review of good policy examples

Introduction



• Welcome & Introduction to Panellists

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• Webinar purpose:

- Opportunity to provide policy guidance Financial Institutions (FI)
- Note on the Importance of Policy requirement to EBRD

What is a policy & why do you need one?



What is an E&S Policy

- Articulates commitment to managing E&S risks, direct and indirect impact as well as integrating E&S considerations throughout FI activities for both external and internal audiences
- Unique there is no one size fits all. A policy must be fit for purpose within each Financial Institution, its ways of working, and the E&S impacts and risks to its business

Why is an E&S Policy needed

- A crucial part of developing an Environmental and Social Management System
- Aligns public commitment with strategic E&S goals and objectives which may be set or revised alongside policy development, review and updates
- Business Imperative for FIs to minimise financial, legal and reputational risks
- Industry best practice: recognising the significance posed to business activities by E&S impacts and risk has become standard throughout financial industry. Not unique requirement of EBRD or other International Financial Institutions

E&S aspects impact customers and FIs



Impacts on **E&S** aspects **Risks for Fls** customers Environment Delays or business Financial cost (e.g. interruptions delayed revenues) Air emissions Financial cost Litigation Land contamination Litigation Reputational Water pollution damage Clean up costs Waste Reduced access to Association with Social DFI capital controversy Health and safety Loss of Forced/Illegal/migrant social/regulatory labour licence to operate • Community displacement Reputational cost

Examples discussed



Hungary – Danube Pollution http://news.nationalgeographic.com/news/2010/10/101012-toxic-spill-hungary-danuberiver-water/

http://www.bbc.co.uk/news/world-europe-11498884

Volkswagen emissions example

http://www.telegraph.co.uk/finance/newsbysector/industry/12039761/Volkswagensuspended-from-FTSE-ethical-index-following-emissions-scandal.html

UK migrant labour example

http://www.dailymail.co.uk/news/article-3265905/Bed-maker-supplies-retailersincluding-John-Lewis-used-Hungarians-slave-labour-paying-2-day-forcing-live-inhumaneconditions.html

Impact of E&S issues on business: example





- Engineering business manufacturing electrical components
- E&S audit by key customer
- Unsafe disposal of waste onto open ground
- Waste contained high levels of copper
- Resulted in loss of contract
- Ultimate failure of the engineering company

An opportunity to improve performance of business



Improve business performance by reducing costs:

Environmental

- Minimise waste, re-use or recycle
- Energy efficiency/resourceefficiency
- Process efficiency reducing emissions and raw material use

Social

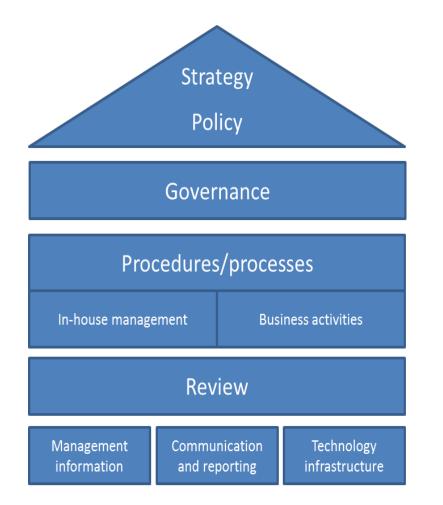
- Good health and safety practices and working conditions
- Positive labour relations minimise lost production time
- Effective community engagement
 minimises disruption



All can lead to lower compliance costs, operational savings and productivity increases

E&S Policy & implementation of ESMS (EBRD Performance Requirement 9)





Strategy : An ESMS should be founded on an overarching strategy that outlines the FI's overall approach to sustainability in its business. The strategy should be supported by clearly articulated strategic priorities, goals and milestones.

ES Policy : FIs should develop and adopt a policy on E&S management that reflects the FI's commitment to managing these factors. The policy (or policies) should outline the FI's approach to E&S factors in its own operations as well as in its business activities

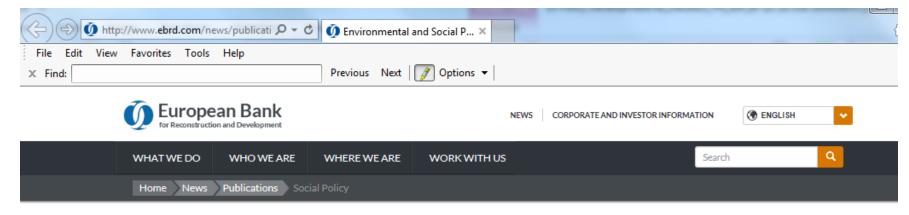
EBRD Environmental and Social Policy



Publication details

The EBRD E&S Policy can be found at:

http://www.ebrd.com/news/publications/policies/environmental-and-social-policy-esp.html



Environmental and Social Policy (ESP)



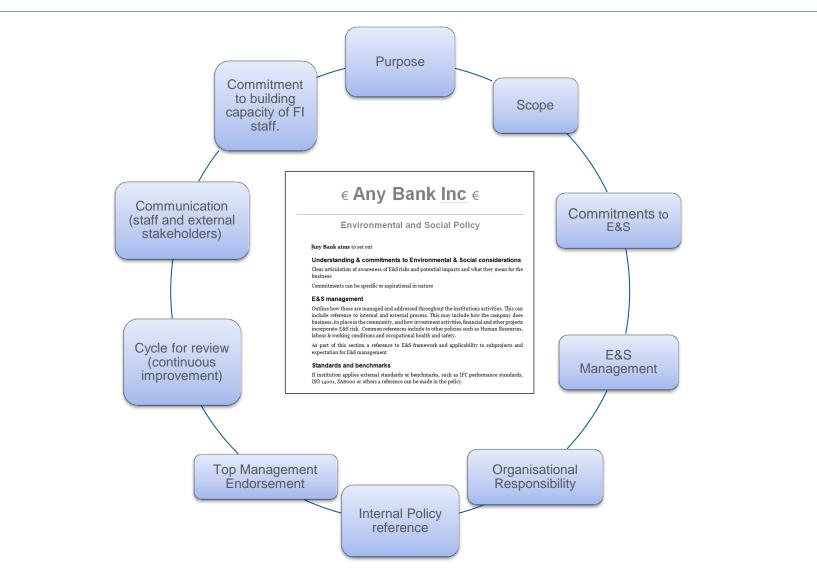






Best practice elements







Select Examples:

Garanti Bank - Turkey

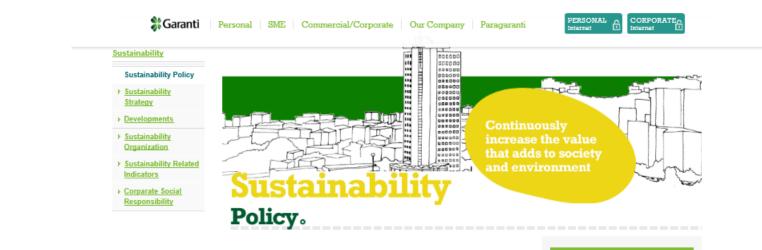
Finansbank Turkey

National Bank of Greece

- No policy template: Good policies reflect (and are reflection of) the FI
- Most important element is to convey what E&S means for the business
- Policy not in isolation: Document presented within company ESMS or broader sustainability/CSR disclosures
- Style Variation:
 - Structure and level of detail may vary depending on the organisation
 - Policy names can vary (CSR, Sustainability, sub policies dealing with Environment and Social separately
 - Often detail is left to E&S management, process documents or other policy documents

Review of good policy examples





To strengthen its Vision to be the best bank in Europe, and its Mission of increasing the value it creates for customers, shareholders, employees, the society and the environment by utilizing its influence, agility and organizational efficiency, Garanti Bank acknowledges the importance of conducting its business activities in a responsible manner, and aims through this Policy Statement to ascertain the guiding principles for its Sustainability strategy and efforts.

The principles support Garanti Bank in effectively defining and addressing material Sustainability risks and opportunities facing the Bank in Turkey.

This Policy Statement, covering the Bank's business activities in Turkey, has been developed in line with the corporate regulations and legislations, and is entered into effect by a prior approval of the Board of Directors.

Overall Sustainability Vision

Sustainability issues are gaining importance within the Turkish society, and are increasingly impacting the banking sector. Garanti Bank strongly believes that operating sustainably is a key driver to the long-term success of the Bank, and aims to be the leader in introducing and implementing sustainable banking to Turkey.

Garanti RSS

20 November 15 Garanti Bankası, "Türkiye'nin En Dijital Şirketi" seçildi. 2

19 October 15 Garanti Bankası, teknoloji ve yaratıcılığı Hackathon'da Buluşturuyor

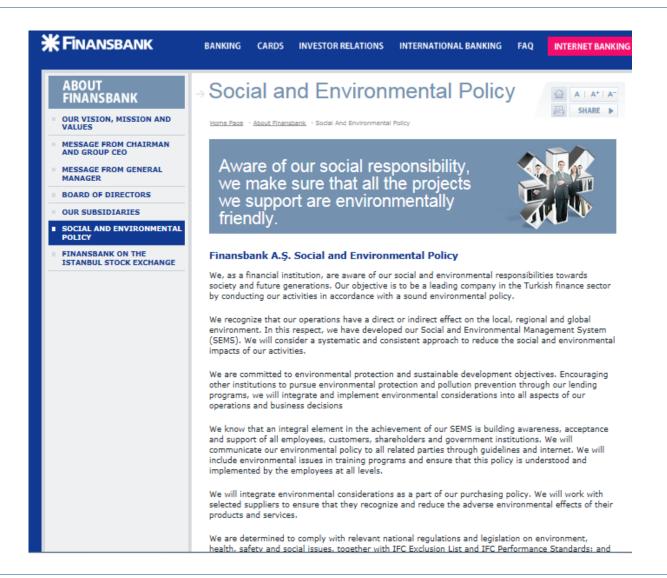
02 September 15 Interview with Mr. Fuat Erbil, President & CEO

27 July 15 The share transfer and change in executive suite

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Review of good policy examples





Review of good policy examples





Environmental Policy Statement of NBG

The Bank Corporate Social Responsibility CSR framework CSR Policy of NBG and its Group Organizational Structure for CSR Issues "Responsibility" Corporate Social Action programme Memberships in Organizations and Indices Responsibility to the Economy Responsibility to the Market Responsibility to the Employees Leading Ahead Responsibility to the Environment Environmental Policy Statement of NBG Environmental Management System Climate Change Responsibility to the Society NBG Cultural Foundation NBG Historical Archive Social Actions by the Banks of the NBG Group Library Annual CSR Reports Contact

Environmental Policy Statement of National Bank of Greece

National Bank of Greece believes that environmental responsibility and the implementation of an environmental policy are the cornerstones of sound corporate behaviour and vital to sustainable development and addressing the problem of climate change.

Having played, over-many decades, a crucial role in the economic and social development of Greece, we are fully aware of the importance that environmental protection has for society and economic development more generally.

To this end, the Bank has formulated an Environmental Management System in accordance with ISO 14001. The Bank's management, represented by its Chief of Human Resources & Group Internal Communications, is responsible for the implementation and continuous improvement of the Environmental Management System.

We are committed to analyzing the environmental impact of our key business operations and activities, setting appropriate objectives and targets for the continuous improvement of our environmental performance and the mitigation of negative environmental impact. Accordingly, we take initiatives and promote action plans that aim to:

- save energy and preserve natural resources,
- rationalise work-related travel by encouraging the use of public transport,
- · manage efficiently paper and solid waste,
- apply environmental criteria in the management of office supplies, and
- implement environmental risk analysis and assessment policy in our investment and credit operation.

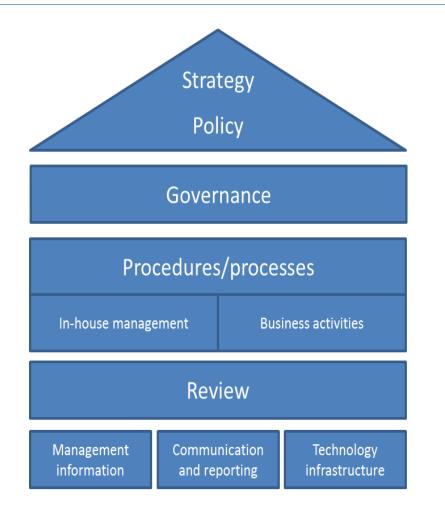
Besides, of course, our commitment to complying with environmental legislation, we monitor on a regular basis the effectiveness of the Environmental Management System.

In our endeavour to make this policy a success, we seek the participation and support of all interested parties, including customers and employees.

Athens, 12 February 2009

Session Conclusion & Questions





- Each FI must create a policy that is unique to is ways of working
- Key part of developing and communicating ESMS
- Existing resources
- Future sessions
- Q&A