



WWF

SUSTAINABLE
BANKING

2020



2020

SUSTAINABLE BANKING ASSESSMENT

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WWF is an independent conservation organization, with over 30 million followers and a global network active in nearly 100 countries. Our mission is to stop the degradation of the planet's natural environment and to build a future in which people live in harmony with nature, by conserving the world's biological diversity, ensuring that the use of renewable natural resources is sustainable, and promoting the reduction of pollution and wasteful consumption. Find out more at panda.org. WWF has worked with the finance sector for more than a decade to redirect financial flows to support global sustainable development, using our conservation expertise to integrate environmental, social, and governance risks and opportunities into mainstream finance. We contribute directly to leading initiatives, including the European Commission's Technical Expert Group on Sustainable Finance and the development of an international green bonds standard. WWF works with some of the largest asset owners, asset managers, banks, and insurers in the world to decarbonize financial portfolios, strengthen lending and investment criteria, fill critical research gaps, and unlock innovations in sustainable finance products.

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INTRODUCTION

The world has changed. The ongoing COVID-19 pandemic has left an indelible mark on humanity, with tragic losses that cannot be overstated. As humanity continues to struggle with the pandemic and the unfolding economic crisis, it has the opportunity to learn from this experience and build back better.

The crisis has emphasized the importance of increasing our resilience to environmental and social (E&S) risks, with some calling COVID-19 a dress rehearsal for the disruptive impacts of climate change and nature loss. Moving into 2021, it will be all the more important for banks and other financial institutions to implement robust measures to address these twin emergencies and help ensure that the pathway taken from here on out is one towards a low-carbon, sustainable and resilient future in which people live in harmony with nature.

Encouragingly, in the last year there has been significant progress in moving financial institutions and business corporations towards more sustainable pathways. The United Nations Environment Programme Finance Initiative (UNEP FI) introduced the Principles for Responsible Banking (PRB) in September 2019, and since then 199 banks representing over a third of the global banking industry have become signatories.¹ The Principles act as a framework for banks to incorporate sustainability into their strategies, operations, and portfolios. Notably, signatories commit to analyzing their impacts on society, setting targets to address those impacts, and disclose their progress against these targets. As such, becoming a signatory to the PRB is a concrete step that banks can take towards transforming into more resilient and sustainable businesses.



Growth in the number of signatories to the Principles for Responsible Investment (PRI) indicates increasing support among asset owners and asset managers for shifting financial flows towards more sustainable outcomes. In particular, the PRI numbers over 3,000 signatories with US\$103 trillion of assets under management: a 20% growth over last year.² This includes over 500 asset owners with almost US\$24 trillion in assets.

Climate-focused initiatives have also taken root. In conjunction with PRI, UNEP FI convened a Net-Zero Asset Owners Alliance at last year's Climate Action Summit in New York. The Alliance's signatories comprise 33 institutional investors with over US\$5 trillion of assets, which have committed to transition their investment portfolios to net-zero GHG emissions by 2050.³ As asset owners with long-term investment horizons, these investors are well positioned to foster responsible investment practices among asset managers, and align their portfolios with the Paris Agreement objectives. This reinforces the work done by Climate Action 100+, a coalition of over 500 investors with over \$47 trillion in assets under management. Climate Action 100+ engages collectively with companies, including the world's 100 largest emitters (collectively making up two-thirds of global industrial emissions), to reduce emissions, improve governance, and enhance climate-related financial disclosures.⁴



REGULATORY PRESSURE CONTINUES TO MOUNT

National governments are taking action on enhancing E&S risk management, governance, and disclosure. WWF's *Sustainable Banking Regulations in ASEAN - Raising the Bar* report in December 2019 found that six ASEAN countries had already issued mandatory regulations or voluntary guidelines on sustainable banking.⁵ Developments in ASEAN since then include:

- In September 2019, Bank Negara Malaysia and Securities Commission Malaysia set up a Joint Committee on Climate Change (JC3), to work towards enhancing the Malaysian financial sector's resilience to climate-related risks through four sub-committees: risk management, governance and disclosure, product and innovation, and engagement and capacity building. Notably, this work includes the creation of a principles-based taxonomy to define (un)sustainable activities, projected to be released in early 2021.⁶
- In April 2020, the Philippines' Bangko Sentral ng Pilipinas (BSP) issued a Sustainable Finance Framework, setting expectations on the integration of sustainability principles into Philippine banks' strategies, operations, governance and risk management systems.⁷
- In June 2020, the Monetary Authority of Singapore (MAS) issued Guidelines on Environmental Risk Management for public consultation, similarly detailing expectations for banks, insurers and asset managers.⁸

Although not regulations, the governments of Japan and Korea have pledged to reduce their economies' emissions to net-zero by 2050, a goal aligned with the target set by European Union last year.⁹ Furthermore, Korea's Financial Supervisory Service announced plans to conduct climate stress-testing on Korea's financial sector, following the recommendations of the Network for Greening the Financial System (NGFS).¹⁰ With China's commitment to achieve net-zero emissions by 2060, the three largest Asian economies have now declared net-zero targets. This sets a strong precedent for other Asian governments to follow,¹¹ and businesses (including financial institutions) operating in these countries should prepare for regulatory changes to come.



NATURE-RELATED RISKS BEGIN TO GARNER ATTENTION

Beyond climate, awareness of the materiality of nature loss continues to grow, and actions, whether from governments, shareholders, or corporations themselves, are beginning to accelerate. Globally, companies are calling on governments to adopt environmental risk policies, including some of the largest and most influential corporations. 600 companies with over US\$4 trillion in revenue, including Walmart and Unilever, are demanding that governments issue policies to reverse nature loss by 2030 as part of Business for Nature's Call to Action.¹² The Food and Land Use Coalition has also issued a call to action to governments worldwide, with a partial focus on a green recovery response from the COVID-19 pandemic by investing in more sustainable and resilient food systems.¹³ In September last year, the French government amended Article 173 of its Energy Transition Law, requiring financial institutions to disclose information on biodiversity-related risks, as well as those related to climate change. And in June 2020, the Dutch Central Bank released a paper finding that biodiversity loss poses physical, transition and reputational risks for financial institutions.¹⁴

Financial institutions are also beginning to take nature-related risks seriously. July saw the creation of a Task Force on Nature-related Financial Disclosures (TNFD), which now numbers 62 members in an informal working group, including financial institutions like AXA, BNP Paribas, DBS Bank, Rabobank and Storebrand.¹⁵ TNFD aims to redirect financial flows towards nature-positive business activities and will work towards creating a reporting framework to enhance nature- and biodiversity-related disclosures. In September, 26 financial institutions with €3 trillion of assets under management signed the Finance for Biodiversity Pledge,¹⁶ committing to conserve biodiversity through their financial activities and calling upon world leaders to reverse nature loss by 2030.



SIGNIFICANT GROWTH IN SUPPORT FOR SUSTAINABILITY REPORTING

More companies than ever are seeing the need for sustainability disclosures. Though the level of TCFD-aligned reporting increased a modest 6% from 2017 to 2019, the number of organizations supporting the Task Force on Climate-related Financial Disclosures (TCFD) has grown about 85% in the last year. TCFD supporters now number over 1,340 companies with a market capitalization of US\$12.6 trillion and include financial institutions responsible for assets of US\$150 trillion.¹⁷ This could indicate that the amount of TCFD-aligned disclosures could grow more rapidly in the near future.

A major development in sustainability reporting came in September 2020 with the *Statement of Intent to Work Together Towards Comprehensive Corporate Reporting*.¹⁸ CDP, CDSB, GRI, SASB, and the International Integrated Reporting Council (IIRC) announced this collaboration to look into aligning their reporting standards, with a view to move towards a comprehensive corporate reporting system. Consequently, IIRC and SASB announced in November 2020 their intention to merge into a single organization: the Value Reporting Foundation, a next step in creating a unified corporate reporting framework.¹⁹ This builds on the Corporate Reporting Dialogue's work as published in *Driving Alignment in Climate-related Reporting* report in September 2019 comparing the same five reporting standards to the TCFD recommendations.²⁰ As happened with financial reporting, major sustainability reporting standards setters are trending towards harmonization in a bid to streamline the disclosure process.

Momentum is clearly shifting towards improving the quality, detail and even the ease of sustainability reporting, especially where climate-related disclosures are concerned. Looking to the future, we can expect this momentum to continue. Managing E&S risks is all the more important in light of the ongoing COVID-19 pandemic, and decision-useful disclosures will play an increasingly large role in doing so.



SUSBA SECTOR POLICIES

New for the 2020 edition of SUSBA is the addition of commitments and client policies that banks can adopt for high-risk sectors. This is a natural complement to SUSBA and this evolution reflects the path of many banks, starting with general ESG or sustainability risk assessments, before increasing scrutiny of clients in high-risk sectors and regions or of issues such as biodiversity. While the determination of what constitutes a high-risk sector or region depends on the characteristics of the bank's clients, many sectors can be considered generally high-risk. These sectors include mining and metals, energy, seafood, chemicals and agricultural commodities such as palm oil, livestock, soy and rubber.

In the first release of such sector commitments and policies, we are adding palm oil and energy to the SUSBA framework. The frameworks for each sector are largely standardized, in which banks are expected to acknowledge the risk inherent in the sector, make commitments to engage with and support clients in their transition to a more sustainable pathway, and apply specific policies to banking relationships across all activities, including lending, advisory and capital markets.

The complete set of indicators is available on the SUSBA website.

PALM OIL



Every single day, we use products that contain palm oil or its derivatives, ranging from cooking oil, processed foods, personal care and cosmetic products, as well as biofuel and animal feed. Demand from biofuels policies in the EU, US, and Asia alone translated to nearly a fifth of global production in 2017. Palm oil's versatility results in it being the world's most produced, consumed and traded vegetable oil, accounting for 41% of global vegetable oil consumption and 60% of annual vegetable oil trade.²¹ Palm oil production is also set to increase from 76 million MT in 2019 to between 264 and 447 million MT by 2050.²²

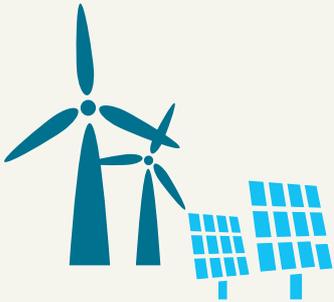
Even though 85% of the palm oil produced in 2019 was from Indonesia and Malaysia, the rise of global demand for palm oil will increase production in new frontier areas, including Papua New Guinea, other parts of Southeast Asia, Africa and, Latin America.²³ Irresponsible palm oil expansion has led to and will continue to lead to widespread destruction of rainforests and other natural ecosystems. This results in significant air pollution and contributes to climate change, often at the expense of the rights and interests of local communities and indigenous people. These impacts are not easily addressed, and the trend of rising production will only exacerbate these issues.²⁴

However, due to palm oil's versatility, significantly higher yield per hectare and ubiquity, boycotts or substitutions of palm oil will likely increase the amount of land required to cultivate alternative oilseeds, putting increased pressure on forests and other terrestrial ecosystems. As such, these do not offer long-term solutions to the challenges we face.

We should also not ignore how increased production has led to socioeconomic benefits in countries with large palm oil production such as Indonesia and Malaysia. Globally, more than 3 million smallholders and small-scale farmers make a living from palm oil – with smallholders accounting for approximately 40% of total global production.²⁵

Consequently, to address long-term challenges such as food security, climate change, and habitat destruction, the palm oil sector must be transformed with responsible and sustainable practices that are non-destructive, halt conversion of natural ecosystems, restore and connect landscapes, and benefit both people and nature. Banks and other financial institutions can play a major role in supporting clients with the uptake of such practices, which will simultaneously improve their management of ESG risks in the sector.

WWF has developed a framework to assess banks' E&S policies for the palm oil sector. Indicators are broken down to assess both the banks' own commitments and their expectations of clients across the entire supply chain. These factors are also aligned with industry good practices such as RSPO certification and WWF's Palm Oil Buyer Scorecards (POBS).



ENERGY

With this decade coined the “Decade of Action” by the United Nations, the transformation needed to deliver the Sustainable Development Goals (SDGs) by 2030 – especially SDG 13 on Climate Action – presents itself as a huge challenge. CO₂ emissions will need to be reduced by 50% by 2030 and achieve net-zero emissions by 2050 in order to limit warming to 1.5°C.²⁶ Systemic changes in energy production will be necessary as it accounts for 73% of all greenhouse gas emissions. Research has also projected a fall in oil and coal demand, with oil demand peaking in 2020. Further research has shown that adoption of renewable energy will likely increase, as it becomes a cheaper, if not the cheapest form of energy in many regions.^{27, 28} Coal, for example, has been projected to fall from 37% of global power generation in 2019 to 28% in IEA's Stated Policies Scenario (STEPS), and 15% in their Sustainable Developed Scenario (SDS).²⁹

The impacts we will experience due to uncontrolled global warming is nowhere more evident than in the increase in natural disasters. From 2000-2019, global disasters have affected over 4 billion people and led to economic losses of approximately US\$2.97 trillion. As compared with the previous 20 years, economic losses totalled just US\$1.63 trillion.³⁰ Much of this rise can be attributed to the increasing number of climate-related disasters such as extreme temperatures, floods and storms. This also does not take into account other impacts such as rising sea levels, water scarcity, crop failure and biodiversity losses.

In Southeast Asia, we will need a transformation of the energy system to meet climate change goals. According to the science, there is a need to phase out coal globally by 2040 in order to meet the commitments made in Paris, which means that existing coal plants will need to be closed.^{31, 32} Despite industry claims that gas can be a transition fuel in the clean energy transition, there is very limited scope for oil and gas in scenarios that hold warming safely below the threshold of 1.5°C.³³

This means that gas investments are also risky, as there is a risk of locking in greenhouse gas emissions that would make the Paris climate goals impossible to achieve. A growing number of financial institutions are ending investment in coal infrastructure, and are also excluding unconventional oil and gas exploration such as Arctic drilling, in light of greater costs and environmental risks.³⁴ Fortunately, there are signs that the energy transition in the region is already underway. Within the next ten years it will be cheaper to build new solar plants compared to operating existing coal plants in both Indonesia and Vietnam.³⁵

Optimistically, there is a gaining momentum for change. More than 1,000 companies have committed to setting science-based targets under the Science-Based Targets Initiative (SBTi), including over 60 financial institutions. The SBTi has also released a framework for financial institutions to align their lending and investment activities with the Paris Agreement to limit global warming to 1.5°C.³⁶ Stronger regulatory pressure will also be expected as we observe net-zero emissions targets from large regional emitters such as Korea, Japan and China. Large International banks such as HSBC and Barclays have also committed to net-zero emissions in their portfolios by 2050. The unexpected COVID-19 pandemic has also led to a strong push for a green recovery, as evidenced by commitments in the EU. However, increasing development in terms of stronger disclosure and changing financing policies will be required to ensure such commitments are not just a form of greenwashing and are actually adhered to.

BANKS ASSESSED

In this fourth assessment, SUSBA covers the E&S integration performance of 38 ASEAN banks and introduces 10 major Japanese and Korean banks.



Three ASEAN banks are new this year: Bank Islam, Bank Raykat, and Rizal Commercial Banking Corporation. The assessment takes into account only publicly available, English-language disclosures in the form of fiscal year 2019 annual reports, sustainability or CSR reports and information posted on corporate websites such as company policies, statements and press releases. The assessment endeavours to take into account information that is as up-to-date as feasibly possible up to the time of publication. The table below features the banks assessed under SUSBA.

1 JAPAN	2 KOREA	3 INDONESIA	4 MALAYSIA	5 PHILIPPINES	6 SINGAPORE	7 THAILAND	8 VIETNAM
<ul style="list-style-type: none"> ■ Mizuho Bank (Mizuho) ■ Mitsubishi UFJ Financial Group Bank (MUFG) ■ Resona Bank (Resona) ■ Sumitomo Mitsui Banking Corporation (SMBC) ■ Sumitomo Mitsui Trust Bank (SMTB) 	<ul style="list-style-type: none"> ■ Hana Bank (Hana) ■ KB Kookmin Bank (KB) ■ Industrial Bank of Korea (IBK) ■ Shinhan Bank (Shinhan) ■ Woori Bank (Woori) 	<ul style="list-style-type: none"> ■ Bank Central Asia Tbk (BCA) ■ Bank Mandiri (Persero) Tbk (Mandiri) ■ Bank Muamalat Indonesia Tbk (Muamalat) ■ Bank Negara Indonesia Tbk (BNI) ■ Bank Panin Tbk (Panin) ■ Bank Pembangunan Daerah Jawa Barat dan Banten Tbk (Bank BJB) ■ Bank Permata Tbk (Permata) ■ Bank Rakyat Indonesia Tbk (BRI) 	<ul style="list-style-type: none"> ■ AMMB Holdings Berhad (Ambank) ■ Bank Islam Malaysia Berhad (BI) ■ Bank Kerjasama Rakyat Malaysia Berhad (BR) ■ CIMB Group Holdings Berhad (CIMB) ■ Hong Leong Bank Berhad (Hong Leong) ■ Malayan Banking Berhad (Maybank) ■ Public Bank Berhad (Public Bank) ■ RHB Bank Berhad (RHB) 	<ul style="list-style-type: none"> ■ BDO Unibank, Inc (BDO) ■ Bank of the Philippine Islands (BPI) ■ China Banking Corporation (CBC) ■ Metropolitan Bank & Trust Company (Metrobank) ■ Philippine National Bank (PNB) ■ Rizal Commercial Banking Corporation (RCBC) ■ Security Bank Corporation (SBC) 	<ul style="list-style-type: none"> ■ DBS Group Holdings Limited (DBS) ■ Oversea-Chinese Banking Corporation Limited (OCBC) ■ United Overseas Bank Limited (UOB) 	<ul style="list-style-type: none"> ■ Bangkok Bank (BBL) ■ Bank of Ayudhya (Krungsri) ■ Kasikorn Bank (KBank) ■ Krung Thai Bank (KTB) ■ Siam Commercial Bank (SCB) ■ Thanachart Bank (TBank) ■ TMB Bank (TMB) 	<ul style="list-style-type: none"> ■ Bank for Investment and Development of Vietnam (BIDV) ■ Joint Stock Commercial Bank for Foreign Trade of Vietnam (VCB) Vietnam Joint ■ Stock Commercial Bank for Industry and Trade (VietinBank) ■ Vietnam Export-Import Commercial Joint Stock Bank (Eximbank) ■ Vietnam Prosperity Bank (VPBank)

SUMMARY RESULTS

AVERAGE PER INDICATOR FOR EACH COUNTRY

ASSESSMENT RESULTS EXPLAINED

- Increase compared to last year
- Current result based on this year's assessment
- Decrease compared to last year
- Current result based on this year's assessment

EGS INTEGRATION PILLARS AND INDICATORS	JAPAN	KOREA	ASEAN							
			INDONESIA	MALAYSIA	PHILIPPINES	SINGAPORE	THAILAND	VIETNAM	AVERAGE	
PURPOSE 	1. Sustainability strategy and stakeholder engagement									
	2. Participation in sustainable finance initiatives									
POLICIES 	3. Public statements on specific ESG issues									
	4. Public statements on specific sectors									
PROCESSES 	5. Assessing ESG risks in client & transaction approvals									
	6. Client monitoring and engagement									
PEOPLE 	7. Responsibilities for ESG									
	8. Staff E&S training and performance evaluation									
PRODUCTS 	9. ESG integration in products and services									
PORTFOLIO 	10. ESG risk assessment and mitigation at portfolio level									
	11. Disclosure of ESG risk exposure and targets									

KEY: Fulfilled Improved No Change Regressed Unfulfilled



KEY FINDINGS

1. The vast majority of banks now understand that climate change is a planetary emergency. 32 of 38 ASEAN banks, as well as three Korean banks and all five Japanese banks, recognize the immense challenges that climate change poses to society, compared to 19 ASEAN banks last year. Across the eight countries, only three ASEAN banks acknowledge that their financing activities have an impact that they can address. Accordingly, banks are increasingly using the SDGs as a way to frame their contributions to society: 30 ASEAN, four Korean, and five Japanese banks incorporated the SDGs into their strategy or vision, 10 more ASEAN banks than last year. However, while all Korean and Japanese banks consider responsible financing and/or climate change material issues, only 28 ASEAN banks do so. This is a modest improvement over the 25 that did so last year, indicating that some banks have yet to treat the climate crisis with the attention it deserves.



2. A third of banks now have strategies to address climate-related risks. The number of ASEAN banks with a climate strategy more than quadrupled, from 2 to 9. All Japanese banks, as well as 3 out of 5 Korean banks also have climate strategies. While SUSBA does not assess the quality of these strategies, this is a marked improvement and a positive sign that banks are taking a more overarching approach towards climate emergency. However, only two ASEAN banks take the next step to perform climate scenario analysis and disclose the results. Korean and Japanese banks perform proportionally better, with two and four banks respectively performing scenario analysis.



3. Banks are not extending the same level of due care to risks from environmental degradation and social issues. Slightly over a third of banks (14 ASEAN, one Korean and three Japanese banks) recognize that the nature emergency poses significant societal and economic risks. Perhaps as a consequence, only five ASEAN banks and no Korean or Japanese banks conduct portfolio-wide assessments of E&S risk exposure. Such risks include deforestation, water scarcity, human rights and labour rights, and are often intertwined with climate-related risks. Therefore, it is important for banks to apply robust safeguards to mitigate the risks arising from all E&S issues.



4. More ASEAN banks have begun to engage financial regulators and supervisors on sustainable finance topics, though Korean and Japanese banks did not clearly disclose such actions. 20 ASEAN banks engage with their regulators, a large improvement over the 11 last year. However, only two Korean banks disclosed engagement with regulators on sustainable finance specifically, while none of the Japanese banks did so. Similarly, only about half the banks are engaging with civil society to understand the impacts of their financing. 20 ASEAN banks, three Japanese banks and one Korean bank disclosed engagement with civil society, which is a step toward better understanding and addressing E&S impacts.

KEY FINDINGS



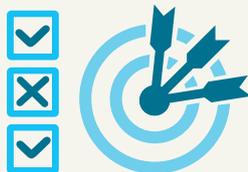
5. There is scant improvement in the number of banks with issue-specific policies to safeguard against E&S risks. Excluding banks added to the assessment this year, two more banks recognize deforestation or biodiversity loss as risks to their portfolios, for a total of 19 banks. Of these, only 3 ASEAN banks explicitly require “no deforestation” commitments from high-risk clients as a condition for financing. As with last year, only three banks in ASEAN prohibit financing of new coal-fired power plant projects without exception – now joined by a single Korean bank. As yet, no bank in ASEAN, Japan or Korea requires its clients to commit to water stewardship or develop a plan to align their businesses with the Paris Agreement objectives. The Sectors & Issues analysis later in the report goes into further detail on banks’ palm oil and energy sector policies.



6. Most banks do not disclose how they integrate E&S risk management into their credit approval and monitoring processes. With the exception of the three Singaporean banks, banks fulfil a third or less of process-related criteria on average. While 24 ASEAN banks, two Korean banks and two Japanese banks disclose a framework by which to conduct E&S due diligence, most banks did not disclose if they take further steps to assess and monitor clients’ compliance with the banks’ E&S policies. Only 11 banks review their clients’ E&S risk profiles periodically, while only six clearly state a process to address prolonged non-compliance with bank policies. This may indicate that banks do not have the necessary procedures in place to implement E&S policies in a robust manner.



7. Over two-thirds of banks have charged senior management with overseeing ESG integration, but half of these banks have yet to distribute these responsibilities further down the organization. Now that banks have begun to set the right tone at the top, they have to empower other personnel to discharge these responsibilities. 13 ASEAN banks, one Korean bank and four Japanese banks have dedicated ESG teams, accounting for just over a third of all banks. Such teams are essential to evaluate complex cases, act as a hub of sustainability expertise, and ensure that a responsible banking culture is instilled throughout organizations. Similarly, just under a third of banks (12 ASEAN and 2 Japanese banks) have integrated E&S risks into their three lines of defence. Doing so will help banks to afford the same level of scrutiny to E&S risks as they do to mainstream financial risks.



8. Just over a third of banks have now set quantified targets to increase financing of more sustainable projects or businesses, while one bank is the first to commit to setting science-based targets. 11 ASEAN, four Japanese and two Korean banks committed to increase either the absolute amount or percentage of sustainable finance in their portfolio. Achieving these targets will contribute to reducing the negative E&S impacts associated with their financing activities. As yet, only one Korean bank out of all Asian banks in SUSBA has taken the next step of committing to set science-based targets, by signing up to the SBTi.

SECTORS & ISSUES

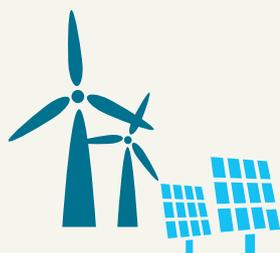


PALM OIL

For palm oil, we see a concentration of commitments and policies in Indonesia, Malaysia and Singapore. Of the 16 banks that mention palm oil, 12 are from these three countries. Policies also tend to focus on the upstream producers, whereas suppliers, third-parties and downstream manufacturers and retailers are not generally covered. Figure 1 below shows the upstream policies applied by ASEAN banks, where even though 12 ASEAN banks acknowledge palm oil as a key sector, only four have disclosed requirements for clients to achieve certification.

PALM OIL SECTOR: % OF BANKS FULFILLING SELECTED INDICATORS BY REGION

INDICATOR	ASEAN	JAPAN/ KOREA
Does the bank identify deforestation and/or conversion of natural ecosystems as a risk (environmental or business risk)?		
Does the bank identify palm oil as a key sector and have a specific policy/approach (for palm oil or agriculture)?		
Does the bank disclose the full sector policy document?		
Does the bank require No Deforestation, No Peat, No Exploitation (NDPE) for client's own plantations?		
Does the bank require time-bound commitment to 100% RSPO certification for client's own operations?		
Does the bank require respect of the free, prior and informed consent (FPIC) of local and indigenous communities, as well as legal and customary user rights, for all new and existing plantations?		



ENERGY

The energy sector policy framework of SUSBA is designed to help banks start to make the transformation needed to align their portfolios with the constraints introduced by climate change. This primarily involves a rapid shift away from fossil fuels, starting with coal, while also safeguarding the most important ecosystems. 30 of 38 ASEAN banks have acknowledged climate risks, but only nine banks have translated this into detailed public policies with client expectations in this area. Figure 2 shows the extent of commitments made across ASEAN.

Further, while exclusion of coal power production and coal mining for the purpose of power production is becoming the norm in Europe, very few ASEAN banks have such policies. Where they exist, they are also typically limited to project-specific finance, meaning that some banks are still enabling the construction of new coal power plants by providing corporate-level financial support to utilities in the region.

ENERGY SECTOR: % OF BANKS FULFILLING SELECTED INDICATORS BY REGION

INDICATOR	ASEAN	JAPAN/ KOREA
Does the bank explicitly acknowledge the societal and economic risks associated with climate change?		
Does the bank identify energy as a key sector for climate change and has specific policy approach(es) for energy or climate?		
Does the bank publicly disclose the sector policy?		
Does the bank prohibit financial products or services to new thermal coal ore extraction or processing?		
Does the bank prohibit the financing of new coal-fired power plant projects?		
Does the bank have a specific target allocated for renewable energy financing (number or portfolio share)?		

RECOMMENDATIONS



WE RECOMMEND BANKS TO:

- **Formulate and/or strengthen climate-related and natural capital risk strategies for the entire portfolio**, by:
 - implementing climate scenario analysis to ascertain portfolio vulnerability to physical and transition risks;
 - assessing portfolios to determine the level of alignment with the objectives of the Paris Agreement;
 - expanding the scope of portfolio-level assessments to cover natural capital risks;
 - proactively supporting high-risk clients to transition away from unsustainable business models;
 - charging the board with formal oversight of ESG strategy implementation by including sustainability criteria in the terms of reference of relevant committees, such as risk, audit, nomination and remuneration;
 - ensuring accountability across the organization by integrating sustainability considerations into key performance indicators for staff;
 - Engaging with relevant ministries and government agencies to drive stronger collective action on climate change and other ESG issues.

- **Provide mandatory training on ESG issues at all levels** – board, senior management and all staff.

- **Strengthen client expectations on thematic issues that cut across multiple sectors** such as deforestation, water, human rights and labour rights.
 - Take reference from internationally recognized standards to craft requirements for clients to adhere to.
 - Expand the scope of these policies beyond project finance to include corporate-level transactions.

- **Develop robust sector-specific policies** that apply at project and corporate levels, and require clients to comply with multi-stakeholder sustainability standards and certification schemes.
 - Where relevant, develop a fossil fuels policy aligned with the latest climate science, including a transition timeline.
 - Use asset-level data and geospatial tools to assess risks associated with climate change and natural capital degradation and measure impacts of the bank's financing activities.

- **Set science-based targets.**
 - Engage with members of the Science-Based Targets Network and other science-based organizations to gain insights on key E&S issues and decarbonization pathways.
 - Commit to setting targets to decarbonize portfolios under the SBTi and work towards achieving those targets.

- **Enhance sustainability disclosure by:**
 - disclosing in line with TCFD recommendations on climate-related governance, strategy, risk management, and metrics and targets;
 - adopting forward-looking scenario analysis and disclosing the results.
 - Begin portfolio impact measurement and reporting, with an objective to obtain a balanced understanding of both negative and positive impacts across all financed sectors; look to internationally recognized frameworks or reporting standards to choose metrics by which to report.



WE RECOMMEND BANKING REGULATORS AND BANKING ASSOCIATIONS TO:

- **Strengthen existing banking regulations and guidelines by requiring banks to:**
 - perform scenario analysis to ascertain where climate-related and other E&S risks arise in their portfolios;
 - adopt science-based standards and targets, including timelines to align portfolios with the Paris Agreement and other planetary boundaries;
 - formalize clear roles and responsibilities for the board of directors and senior management to manage climate-related and other E&S risks, such as through the terms of reference of relevant committees, including risk, audit, nomination and remuneration.
- **Strengthen mandatory requirements around banks' ESG disclosures.**
 - Align such requirements with the TCFD recommendations.
 - Ensure that disclosure requirements cover natural capital risks such as deforestation and water scarcity.
- **Make training programmes mandatory** for boards, senior management and all staff.
- **Initiate stress-testing** of the financial sector's exposure and resilience to climate- and environment-related risks, and consider taking the measures necessary to address any identified risks.
- **Develop an enabling environment** to accelerate the shift of financial flows towards more resilient and sustainable activities, e.g. through:
 - creating differentiated capital requirements and financial incentives based on the sustainability of the underlying assets;
 - developing taxonomies for (un)sustainable activities and standards for green financial products;
 - working to harmonize regulatory frameworks and standards across nations.



WE RECOMMEND SHAREHOLDERS OF BANKS TO:

- **Engage with portfolio banks bilaterally and/or collectively** to drive progress on the above recommendations for banks by:
 - calling for banks to develop more robust E&S policies and strategies;
 - actively voting on ESG issues;
 - Pushing for an assessment of their portfolio-level exposure to climate and other ESG risks, including forward-looking scenario analysis, to determine alignment with investor's own ESG commitments and international initiatives like the Paris Agreement;
 - requesting banks to disclose in line with TCFD recommendations and according to established sustainability reporting standards, e.g. SASB or GRI;
 - encouraging banks to make science-based decarbonization commitments, to align their portfolios with the SDGs and the Paris Agreement; joining the PRB would help to guide banks along this journey.
- **Engage with regulators, stock exchanges and banking associations** on the issuance and update of prescriptive and robust regulations for financial institutions, not just for climate but also for broader E&S risks and impacts.



ASFI CAN SUPPORT THE BANKING SECTOR IN THE FOLLOWING WAYS:

- **Provide a one-stop shop** where financial institutions can obtain deep knowledge on the latest sustainable finance research, tools, regulations and guidelines, reporting standards and more.
- **Build capacity of boards/senior management and staff** via training workshops, online learning and research to strengthen the three lines of defence on ESG issues, as well as understand global sustainable finance landscape and regulations, risk management tools and sustainability standards.
- **Advise banks on the use of science-based standards and tools** for performing portfolio-wide assessments/scenario analysis, so as to **manage risk and align portfolios** with the objectives of the Paris Agreement and other planetary boundaries.
- **Work with financial institutions to develop green/blue financial solutions** that have measurable impacts, science-based criteria and appropriate safeguards in place to minimize potential negative E&S impacts. This will support banks to capture business opportunities and mobilize capital to meet the significant financing needs for the transition to a sustainable, low-carbon economy.
- **Measure and benchmark progress of financial institutions' ESG integration and risk management** against regional and international peers, identify areas for improvement, and highlight best practices in ESG integration via tools such as the SUSBA online platform (susba.org) and RESPOND (resilientportfolios.org), an ESG integration assessment framework for asset managers. This is useful for banks, investors, regulators and banking associations to drive faster progress.
- **Support banks in understanding increasing expectations from international investors around ESG issues** as well as the implications for banks of impending sustainable finance regulations at both national and international levels.

COUNTRY-LEVEL RESULTS

JAPAN E&S INTEGRATION DISCLOSURE RESULTS

ASSESSMENT RESULTS EXPLAINED

- Increase compared to last year
- Current result based on this year's assessment
- Current result based on this year's assessment
- Decrease compared to last year

E&S INTEGRATION PILLARS AND INDICATORS		MUFG	MIZUHO	RESONA	SMBC	SMTB	AVERAGE
PURPOSE 	1. Sustainability strategy and stakeholder engagement						
	2. Participation in sustainable finance initiatives						
POLICIES 	3. Public statements on specific ESG issues						
	4. Public statements on specific sectors						
PROCESSES 	5. Assessing ESG risks in client & transaction approvals						
	6. Client monitoring and engagement						
PEOPLE 	7. Responsibilities for ESG						
	8. Staff E&S training and performance evaluation						
PRODUCTS 	9. ESG integration in products and services						
PORTFOLIO 	10. ESG risk assessment and mitigation at portfolio level						
	11. Disclosure of ESG risk exposure and targets						

KEY: Fulfilled Improved No Change Regressed Unfulfilled



KOREA E&S INTEGRATION DISCLOSURE RESULTS

ASSESSMENT RESULTS EXPLAINED

- Increase compared to last year
- Current result based on this year's assessment
- Current result based on this year's assessment
- Decrease compared to last year

E&S INTEGRATION PILLARS AND INDICATORS		HANA	IBK	KB	SHINHAN	WOORI	AVERAGE
PURPOSE 	1. Sustainability strategy and stakeholder engagement						
	2. Participation in sustainable finance initiatives						
POLICIES 	3. Public statements on specific ESG issues						
	4. Public statements on specific sectors						
PROCESSES 	5. Assessing ESG risks in client & transaction approvals						
	6. Client monitoring and engagement						
PEOPLE 	7. Responsibilities for ESG						
	8. Staff E&S training and performance evaluation						
PRODUCTS 	9. ESG integration in products and services						
PORTFOLIO 	10. ESG risk assessment and mitigation at portfolio level						
	11. Disclosure of ESG risk exposure and targets						

KEY: Fulfilled Improved No Change Regressed Unfulfilled

COUNTRY-LEVEL RESULTS



INDONESIA E&S INTEGRATION DISCLOSURE RESULTS

ASSESSMENT RESULTS EXPLAINED

- Increase compared to last year
- Current result based on this year's assessment
- Decrease compared to last year
- Current result based on this year's assessment

E&S INTEGRATION PILLARS AND INDICATORS		BCA	MANDIRI	BNI	MUAMALAT	PANIN	BJB	PERMATA	BRI	AVERAGE
PURPOSE	1. Sustainability strategy and stakeholder engagement									
	2. Participation in sustainable finance initiatives									
POLICIES	3. Public statements on specific ESG issues									
	4. Public statements on specific sectors									
PROCESSES	5. Assessing ESG risks in client & transaction approvals									
	6. Client monitoring and engagement									
PEOPLE	7. Responsibilities for ESG									
	8. Staff E&S training and performance evaluation									
PRODUCTS	9. ESG integration in products and services									
PORTFOLIO	10. ESG risk assessment and mitigation at portfolio level									
	11. Disclosure of ESG risk exposure and targets									

KEY: Fulfilled Improved No Change Regressed Unfulfilled



MALAYSIA E&S INTEGRATION DISCLOSURE RESULTS

ASSESSMENT RESULTS EXPLAINED

- Increase compared to last year
- Current result based on this year's assessment
- Decrease compared to last year

E&S INTEGRATION PILLARS AND INDICATORS		AMBANK	BANK ISLAM	BANK RAKYAT	CIMB	HONG LEONG	MAYBANK	PUBLIC BANK	RHB	AVERAGE
PURPOSE 	1. Sustainability strategy and stakeholder engagement									
	2. Participation in sustainable finance initiatives									
POLICIES 	3. Public statements on specific ESG issues									
	4. Public statements on specific sectors									
PROCESSES 	5. Assessing ESG risks in client & transaction approvals									
	6. Client monitoring and engagement									
PEOPLE 	7. Responsibilities for ESG									
	8. Staff E&S training and performance evaluation									
PRODUCTS 	9. ESG integration in products and services									
PORTFOLIO 	10. ESG risk assessment and mitigation at portfolio level									
	11. Disclosure of ESG risk exposure and targets									

KEY: Fulfilled Improved No Change Regressed Unfulfilled



THE PHILIPPINES E&S INTEGRATION DISCLOSURE RESULTS

ASSESSMENT RESULTS EXPLAINED

- Increase compared to last year
- Current result based on this year's assessment
- Current result based on this year's assessment
- Decrease compared to last year

E&S INTEGRATION PILLARS AND INDICATORS		BDO	BPI	CBC	METROBANK	PNB	RCBC	SBC	AVERAGE
PURPOSE	1. Sustainability strategy and stakeholder engagement								
	2. Participation in sustainable finance initiatives								
POLICIES	3. Public statements on specific ESG issues								
	4. Public statements on specific sectors								
PROCESSES	5. Assessing ESG risks in client & transaction approvals								
	6. Client monitoring and engagement								
PEOPLE	7. Responsibilities for ESG								
	8. Staff E&S training and performance evaluation								
PRODUCTS	9. ESG integration in products and services								
PORTFOLIO	10. ESG risk assessment and mitigation at portfolio level								
	11. Disclosure of ESG risk exposure and targets								

KEY: Fulfilled Improved No Change Regressed Unfulfilled



SINGAPORE E&S INTEGRATION DISCLOSURE RESULTS

ASSESSMENT RESULTS EXPLAINED

- Increase compared to last year
- Current result based on this year's assessment
- Decrease compared to last year
- Current result based on this year's assessment

E&S INTEGRATION PILLARS AND INDICATORS		DBS	OCBC	UOB	AVERAGE
PURPOSE 	1. Sustainability strategy and stakeholder engagement				
	2. Participation in sustainable finance initiatives				
POLICIES 	3. Public statements on specific ESG issues				
	4. Public statements on specific sectors				
PROCESSES 	5. Assessing ESG risks in client & transaction approvals				
	6. Client monitoring and engagement				
PEOPLE 	7. Responsibilities for ESG				
	8. Staff E&S training and performance evaluation				
PRODUCTS 	9. ESG integration in products and services				
PORTFOLIO 	10. ESG risk assessment and mitigation at portfolio level				
	11. Disclosure of ESG risk exposure and targets				

KEY: Unfulfilled Improved No Change Regressed Unfulfilled

COUNTRY-LEVEL RESULTS



THAILAND E&S INTEGRATION DISCLOSURE RESULTS

ASSESSMENT RESULTS EXPLAINED

- Increase compared to last year
- Current result based on this year's assessment
- Decrease compared to last year
- Current result based on this year's assessment

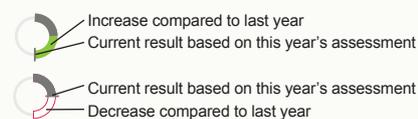
E&S INTEGRATION PILLARS AND INDICATORS		BBL	KRUNGSRI	KBANK	KTB	SCB	TBANK	TMB	AVERAGE
PURPOSE	1. Sustainability strategy and stakeholder engagement								
	2. Participation in sustainable finance initiatives								
POLICIES	3. Public statements on specific ESG issues								
	4. Public statements on specific sectors								
PROCESSES	5. Assessing ESG risks in client & transaction approvals								
	6. Client monitoring and engagement								
PEOPLE	7. Responsibilities for ESG								
	8. Staff E&S training and performance evaluation								
PRODUCTS	9. ESG integration in products and services								
PORTFOLIO	10. ESG risk assessment and mitigation at portfolio level								
	11. Disclosure of ESG risk exposure and targets								

KEY: Fulfilled Improved No Change Regressed Unfulfilled



VIETNAM E&S INTEGRATION DISCLOSURE RESULTS

ASSESSMENT RESULTS EXPLAINED



E&S INTEGRATION PILLARS AND INDICATORS		BIDV	VCB	VIETINBANK	EXIMBANK	VPBANK	AVERAGE
PURPOSE 	1. Sustainability strategy and stakeholder engagement						
	2. Participation in sustainable finance initiatives						
POLICIES 	3. Public statements on specific ESG issues						
	4. Public statements on specific sectors						
PROCESSES 	5. Assessing ESG risks in client & transaction approvals						
	6. Client monitoring and engagement						
PEOPLE 	7. Responsibilities for ESG						
	8. Staff E&S training and performance evaluation						
PRODUCTS 	9. ESG integration in products and services						
PORTFOLIO 	10. ESG risk assessment and mitigation at portfolio level						
	11. Disclosure of ESG risk exposure and targets						

KEY:  Fulfilled  Improved  No Change  Regressed  Unfulfilled

SUSBA Framework Sub-indicators

	1) PURPOSE - SUSTAINABILITY STRATEGY AND STAKEHOLDER ENGAGEMENT
1.1.1	Is there a clear reference to sustainability in the bank's strategy and long-term vision?
1.1.2	Does the bank clearly recognize that its ESG footprint includes the indirect effects arising from its business activities (e.g. financing, underwriting, advising) and portfolio?
1.1.3	Does the leadership statement make reference to the integration of ESG factors in the bank's business strategy?
1.1.4	Is there a clear reference to sustainable development goals (SDGs) in the bank's strategy or vision?
1.1.5	Does the bank explicitly acknowledge the societal and economic risks associated with climate change?
1.1.6	Does the bank explicitly acknowledge the societal and economic risks associated with environmental degradation?
1.1.7	Does the bank disclose the types of stakeholders it engages with on ESG issues?
1.1.8	Does the bank engage with civil society and/or non-governmental organisations to understand the ESG impacts of its business activities?
1.1.9	Does the bank disclose the frequency and mode of communication with stakeholders?
1.1.10	Has the bank identified responsible financing/lending and/or other key E&S issues as material?
	2) PURPOSE - PARTICIPATION IN SUSTAINABLE FINANCE INITIATIVES
1.2.1	Does the bank participate in relevant commitment-based sustainable finance initiatives such as RSPO, PRB, EP, SBTi, or SBEFP?*
1.2.2	Does the bank engage with regulators and policy makers on ESG integration and/or sustainable finance topics?
	3) POLICIES - PUBLIC STATEMENTS ON SPECIFIC ESG ISSUES
2.1.1	Does the bank have exclusionary principles covering activities the bank will not support, taking into account ESG considerations?

2.1.2	Does the bank require clients highly exposed to climate-related risks to develop a mitigation plan and ultimately align their activities to the objectives of the Paris Agreement?
2.1.3	Does the bank prohibit the financing of new coal-fired power plant projects?
2.1.4	Does the bank acknowledge biodiversity loss and/or deforestation risks in its clients' activities?
2.1.5	Does the bank require clients in sectors highly exposed to deforestation (e.g. soft commodities, infrastructure, extractives industry) to adopt “no deforestation” commitments?
2.1.6	Does the bank recognise negative impacts on the marine environment as risks in client's activities?
2.1.7	Does the bank have a commitment not to provide financial products and services to projects or companies located in, or having negative impacts on, UNESCO World Heritage Sites?
2.1.8	Does the bank recognize water risks (flooding, scarcity, and pollution) as risks in its clients' activities?
2.1.9	Does the bank require clients in high-risk sectors and geographies to perform water risk assessments and commit to water stewardship?
2.1.10	Does the bank recognize human rights risks, including those related to local communities, in its clients' activities?
2.1.11	Does the bank require clients to commit to respecting human rights, in line with the UN Guiding Principles on Business and Human Rights?
2.1.12	Does the bank recognize labour rights violations as a risk across all sectors?
2.1.13	Does the bank require clients to adhere to international labour standards equivalent to the ILO Fundamental Conventions?
2.1.14	Are the bank's E&S requirements applicable to financial products and services beyond lending (i.e. capital markets, advisory)?
	4) POLICIES - PUBLIC STATEMENTS ON SPECIFIC SECTORS
2.2.1	Does the bank have sector policies or sector-specific requirements for environmentally or socially sensitive industries, e.g. agri commodities, energy, oil & gas, mining, seafood, infrastructure?
2.2.2	Does the bank disclose its requirements/policies for environmentally or socially sensitive sectors?
2.2.3	Do the bank's E&S policies include minimum requirements or recommendations based on internationally recognized standards for best E&S practices (e.g. IFC Performance Standards, RSPO, FSC, etc.)?
2.2.4	Does the bank periodically review its E&S policies or stated that last date of review was within the past 2 years?

SUSBA FRAMEWORK SUB-INDICATORS

	5) PROCESSES - ASSESSING ESG RISKS IN CLIENT & TRANSACTION APPROVALS
3.1.1	Does the bank use standardized frameworks for E&S due diligence (e.g. tools, checklists, questionnaires, external data providers) when reviewing clients or transactions subject to its policies?
3.1.2	Does the bank assess its clients' capacity, commitment, and track record as part of its E&S due diligence process?
3.1.3	As part of the approval process does the bank classify its clients and transactions based on E&S risk assessment?
3.1.4	Is there an escalation mechanism for more complex or controversial cases?
3.1.5	Do the E&S risk assessment outcomes influence transaction and client acceptance decisions?
	6) PROCESSES - CLIENT MONITORING AND ENGAGEMENT
3.2.1	Does the bank seek the inclusion of clauses (e.g. covenants, representations & warranties) related to E&S issues in the loan documentation for bilateral and syndicated credit facilities?
3.2.2	Does the bank require clients that are not fully compliant with its E&S policies to develop and implement time-bound action plans?
3.2.3	Does the bank monitor its clients' compliance with the agreed E&S action plans?
3.2.4	Does the bank perform periodic review or state how frequent it reviews its clients' profiles on E&S?
3.2.5	Does the bank disclose the process to address non-compliance of existing clients with the bank's policies or with pre-agreed E&S action plans?
3.2.6	Does the bank periodically review its internal E&S procedures or stated that the last date of review was within the past 2 years?
	7) PEOPLE - RESPONSIBILITIES FOR ESG
4.1.1	Is senior management responsible for the implementation of the bank's ESG strategy?
4.1.2	Do senior management's responsibilities include management of climate change risks and opportunities relevant to the bank's activities?
4.1.3	Does the bank describe the roles and responsibilities of the various departments, committees or teams involved in developing and implementing its E&S policies?
4.1.4	Has the bank put in place an internal control system with three lines of defence to manage E&S issues?

4.1.5	Do the terms of reference of the Nominating committee include sustainability-related criteria for the appointment of new Board members?
4.1.6	Do the terms of reference of the Remuneration committee include sustainability-related criteria for the assessment of performance and remuneration levels for senior management?
4.1.7	Do the terms of reference of the Audit committee require sustainability-related matters to be included in internal control and audit processes?
4.1.8	Does the bank implement periodic audits to assess implementation of E&S policies and procedures?
	8) PEOPLE - STAFF E&S TRAINING AND PERFORMANCE EVALUATION
4.2.1	Does the bank have a dedicated ESG team to implement E&S policies and procedures?
4.2.2	Does the bank train its staff on E&S policies and implementation processes?
4.2.3	Does the bank provide specific training for its senior management, covering sustainability issues?
4.2.4	Are sustainability-related criteria part of the staff appraisal process and/or integrated into KPIs for its staff?
	9) PRODUCTS - ESG INTEGRATION IN PRODUCTS AND SERVICES
5.1.1	Does the bank proactively identify clients in environmentally or socially sensitive sectors to support them in reducing negative or enhancing positive impacts?
5.1.2	Does the bank offer specific financial products and services (e.g. green bonds, sustainability-linked loans, impact financing) that support the mitigation of E&S issues, e.g. climate change, water scarcity and pollution, deforestation?
5.1.3	Does the bank allocate specific pools of capital or set targets to increase the share of its financing that supports activities with a positive environmental or social impact?
5.1.4	Does the bank hold client outreach events to raise awareness and share on good E&S practices (e.g. through joint workshops)?
	10) PORTFOLIO - ESG INTEGRATION IN PRODUCTS AND SERVICES
6.1.1	Does the bank periodically review its portfolio exposure to E&S risks (e.g. deforestation, water scarcity, or human rights violations)?

SUSBA FRAMEWORK SUB-INDICATORS

6.1.2	Does the bank periodically review its portfolio exposure to climate-related physical and/or transition risks, using scenario analysis, and disclose the results and methodology used?
6.1.3	Does the bank have a strategy to manage and mitigate climate-related risks across its portfolio?
	11) PORTFOLIO - DISCLOSURE OF ESG RISK EXPOSURE AND TARGETS
6.2.1	Does the bank disclose its credit exposure by industry sector?
6.2.2	Does the bank disclose the composition of its lending portfolios in the power generation (e.g. fossil fuel vs. renewable energy) and upstream energy exploration and production (e.g. conventional vs. unconventional oil & gas, coal) sectors?
6.2.3	Does the bank disclose the GHG emissions or carbon intensity of the main carbon-intensive sectors in its portfolio (eg. agriculture, mining & metals, energy, etc.)?
6.2.4	Does the bank disclose statistics on the implementation of its E&S policies (e.g. number of transactions assessed, escalated, approved, declined, approved with conditions)?
6.2.5	Does the bank disclose the percentage of its soft commodities clients that have time-bound plans to achieve full certification of their operations against credible, multi-stakeholder sustainability standards?
6.2.6	Does the bank disclose the percentage of clients or total credit exposure covered by its E&S policies on sensitive sectors?
6.2.7	Does the bank have targets in place to reduce the negative E&S impacts associated with its business activities, beyond direct impacts from its own operations?
6.2.8	Does the bank set or commit to set science-based targets to align its portfolio with the objectives of the Paris Agreement?
6.2.9	Does the bank conduct external assurance of its ESG-related disclosures?
6.2.10	Does the bank disclose the positive and negative impacts associated with its business activities, beyond direct impacts from its own operations?

* RSPO - Roundtable on Sustainable Palm Oil; PRB - Principles for Responsible Banking; EP - Equator Principles; SBTi - Science Based Targets initiative; SBEFP - Sustainable Blue Economy Finance Principles.

REFERENCES

1. United Nations Environment Programme Finance Initiative (2020). [online] <https://www.unepfi.org/banking/bankingprinciples/>
2. Principles for Responsible Investment (2020). [online] <https://www.unpri.org/about-the-pri>
3. UNEP FI (2020). [online] <https://www.unepfi.org/net-zero-alliance/>
4. Climate Action 100+ (2020). [online] <http://www.climateaction100.org/about-us>
5. WWF (2019). Sustainable Banking Regulations in ASEAN - Raising the Bar. [online] https://d2ouvy59p0dg6k.cloudfront.net/downloads/wwf_sustainable_banking_regulations_in_asean_raising_the_bar_dec_2019.pdf
6. Bank Negara Malaysia (2020). Joint Statement by Bank Negara Malaysia and Securities Commission Malaysia - Accelerating climate action through the financial sector. [online] https://www.bnm.gov.my/index.php?ch=en_press&pg=en_press&ac=5113
7. Sustainable Banking Network (2020). BSP issues guidelines on sustainable finance framework. [online] <https://www.sustainablebankingnetwork.org/article/175.html>
8. Monetary Authority of Singapore (2020). MAS Consults on Environmental Risk Management Guidelines for Financial Institutions. [online] <https://www.mas.gov.sg/news/media-releases/2020/mas-consults-on-environmental-risk-management-guidelines-for-financial-institutions>
9. The Independent (2020). Japan 'to pledge net zero emissions by 2050' in major policy shift. [online] <https://www.independent.co.uk/environment/japan-net-zero-2050-emissions-climate-crisis-prime-minister-yoshihide-suga-b1251563.html>
10. Korea Times (2020). FSS chief stresses need to monitor climate-related risks [online] https://www.koreatimes.co.kr/www/biz/2020/10/367_296480.html
11. Nikkei Asia (2020). South Korea joins Japan in making 2050 carbon-neutral pledge. [online] <https://asia.nikkei.com/Spotlight/Environment/South-Korea-joins-Japan-in-making-2050-carbon-neutral-pledge>
12. Business for Nature (2020). Business for Nature's Call to Action. [online] <https://www.businessfornature.org/call-to-action>
13. Food and Land Use Coalition (2020). A Call to Action for World Leaders. [online] <https://www.foodandlandusecoalition.org/a-call-to-action-for-world-leaders/>
14. De Nederlandsche Bank (2020). DNBulletin: Indebted to nature. [online] <https://www.dnb.nl/en/news/news-and-archive/dnbulletin-2020/dnb389169.jsp>
15. Task Force on Nature-related Financial Disclosures (2020). [online] <https://tnfd.info/how-it-will-work/>
16. Finance for Biodiversity Pledge (2020). [online] <https://www.financeforbiodiversity.org/>
17. Task Force on Climate-related Financial Disclosures (2020). TCFD Status Report. [online] https://assets.bbhub.io/company/sites/60/2020/09/2020-TCFD_Status-Report.pdf
18. CDP, CDSB, GRI, IIRC, SASB (2020). Statement of Intent to Work Together Towards Comprehensive Corporate Reporting. [online] <https://www.globalreporting.org/media/bixjk1ud/statement-of-intent-to-work-together-towards-comprehensive-corporate-reporting.pdf>
19. IIRC, SASB (2020). IIRC and SASB announce intent to merge in major step towards simplifying the corporate reporting system. [online] <https://www.sasb.org/wp-content/uploads/2020/11/IIRC-SASB-Press-Release-Web-Final.pdf>
20. Corporate Reporting Dialogue (2019). Driving Alignment in Climate-related Reporting. [online] https://corporatereportingdialogue.com/climatereport2019/pdf/CRD_BAP_Report_2019.pdf
21. USDA (2019). FAS Home, Market and Trade Data, [online] <https://apps.fas.usda.gov/psdonline/app/index.html#/app/compositeViz>
22. Afriyanti, D., Kroeze, C. and Saad, A. (2016). 'Indonesia palm oil production without deforestation and peat conversion by 2050', Science of the Total Environment, 557: 562-570.
23. USDA-FAS (2020). Production, Supply and Distribution - Oil, Palm World as of Dec 2019 [online] <https://apps.fas.usda.gov/>
24. Pacheco, P. (2012). Soybean and oil palm expansion in South America: A review of main trends and implications, Working Paper 90, Bogor, Indonesia: CIFOR [online] http://www.cifor.org/publications/pdf_files/WPapers/WP90Pacheco.pdf
25. RSPO (2020). [online] <https://rspo.org/smallholders>
26. J. Rockström et al., A roadmap for rapid decarbonization. Science 355.6331, 1269-1271 (2017).
27. SP Global (2020). [online] <https://www.spglobal.com/platts/en/market-insights/latest-news/electric-power/062320-oil-fossil-fuel-demand-may-have-peaked-in-2019-thanks-to-covid-19-report>
28. IRENA (2020) Power Generation Costs 2019. [online] https://www.irena.org/-/media/Files/IRENA/Agency/Publication/2020/Jun/IRENA_Power_Generation_Costs_2019.pdf
29. IEA (2020) World energy outlook 2020. [online] https://iea.blob.core.windows.net/assets/80d64d90-dc17-4a52-b41f-b14c9be1b995/WEO2020_ES.PDF
30. UNDRR (2020). [online] <https://www.undrr.org/publication/human-cost-disasters-overview-last-20-years-2000-2019>
31. Climate Analytics (2020). Coal phase-out. [online] <https://climateanalytics.org/briefings/coal-phase-out/>
32. Carbon Brief (2020). Analysis: Why coal use must plummet this decade to keep global warming below 1.5C. [online] <https://www.carbonbrief.org/analysis-why-coal-use-must-plummet-this-decade-to-keep-global-warming-below-1-5c>
33. See for example: <https://carbontracker.org/reports/balancing-the-budget/>
34. See: <https://ieefa.org/exiting-oil-gas/>
35. Carbon Tracker (2018). Cheaper to build new renewables than run existing coal plants within 10 years' time in South-east Asia [online] <https://carbontracker.org/cheaper-to-build-new-renewables-than-run-existing-coal-plants-within-10-years-time-in-south-east-asia/>
36. SBTi (2020). Companies taking action. [online] <https://sciencebasedtargets.org/companies-taking-action/>

ABBREVIATIONS

ADB	Asian Development Bank
ASFI	Asia Sustainable Finance Initiative
ASEAN	Association of Southeast Asian Nations
AUM	Assets under management
ESG	Environmental, social and governance
E&S	Environmental and social
GHG	Greenhouse gas
GRI	Global Reporting Initiative
IIRC	International Integrated Reporting Council
IPBES	Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services
IPCC	Intergovernmental Panel on Climate Change
NGFS	Network for Greening the Financial System
OJK	Financial Services Authority of Indonesia
PRA	Prudential Regulation Authority
PRB	Principles for Responsible Banking
PRI	Principles for Responsible Investment
RSPO	Roundtable on Sustainable Palm Oil
SASB	Sustainability Accounting Standards Board
SBEFP	Sustainable Blue Economy Finance Principles
SDGs	Sustainable Development Goals
UNEPFI	United Nations Environment Programme Finance Initiative
SBTi	Science-Based Targets initiative
SUSBA	Sustainable Banking Assessment
TCFD	Task Force on Climate-related Financial Disclosures
TNFD	Task Force on Nature-related Financial Disclosures



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WWF SUSTAINABLE FINANCE

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for people and wildlife

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