PRINCIPLES FOR RESPONSIBLE BANKING

REPORTING 2023







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.

Societe Generale is one of the leading European financial services groups. Based on a diversified and integrated banking model, Societe Generale combines financial strength and proven expertise in innovation with a strategy of sustainable growth, aiming to be a trusted partner for clients, committed to the positive transformations of the world. The Group employs over 117,000 people in 66 countries and supports 25 million individual customers), businesses and institutional investors around the world.

The Group's 3 core businesses offer a wide range of advisory services and tailored financial solutions to secure transactions, protect and manage assets and savings, help clients finance their projects, protect them in their day-to-day lives and professional activities, and provide innovative services and solutions.

For 2022, retail activities (France and International) represent 50% of our PNB, Global Markets and Investor Services 24%, Financing and Advisory 12%, and Financial services and Insurance about 14%.

Societe Générale has successfully passed key milestones in a number strategic projects :

- Completion on 1 January 2023 of the legal merger between Societe Generale and Crédit du Nord,
- accelerated growth of online bank Boursorama,
- further development in ALD's long-term car rental business which is due to close the deal to acquire LeasePlan in the first half of 2023,
- consolidating the Group's cash equities activity following the announcement of plans to form a joint venture combining Societe Generale's and Bernstein Research Services' equity research and execution platforms to create a leading global franchise.

The Group also finalised in May 2022 the effective and orderly withdrawal from Russia following the disposal of Rosbank and its Russian insurance subsidiaries.

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- <u>Societe Generale presentation</u>, (Chapter 1, Profile of Societe Generale, page 8)
- <u>A diversified and integrated model</u>, (Chapter 1.3, A diversified and integrated model, page 11)
- <u>Societe Générale main activities</u>, (Chapter 2.1, Societe Générale group's main activities, page 28)
- <u>Outstanding amounts and</u> <u>impairments</u> by geographical region, Chapter 6, page 459)
- <u>PNB and Assets</u> by geographical region, Chapter 6, page 508)

Risk Report 2022 (pillar 3 regulation)

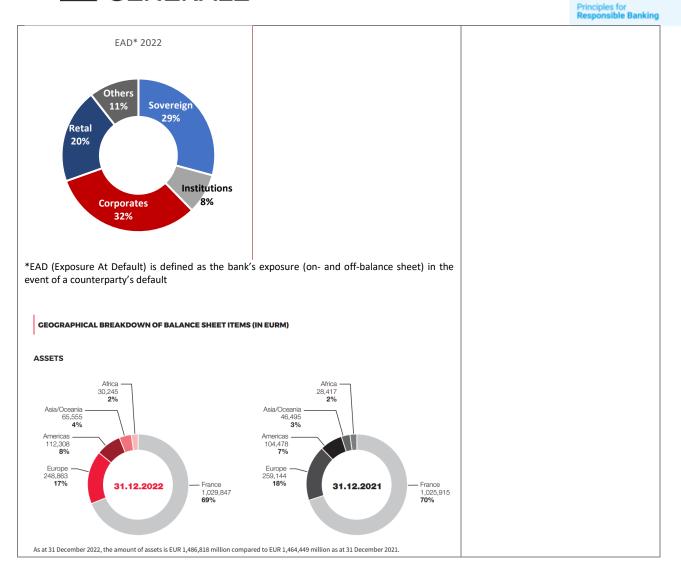
- Credit risk exposure (Chapter 6.6, Additionnal Quantitative Information on credit Risk, page 138)
- Exposures by BS/Off BS and asset classes (Chapter 6.5, Quantitative Information, table 49 - page 121)
- Loan and Advances by industries (Chapter 6.5, Quantitative Information, table 54 - page 131)

Integrated report 2022-2023:

Societe Generale key datas











Strategy alignment

Does your corporate strategy identify and reflect sustainability as strategic priority/ies for your bank?

| \boxtimes | 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: EU taxonomy regulation, EBA Pilar 3

Any applicable regulatory reporting requirements on social risk assessments, e.g. on modern slavery - please specify which ones: EU taxonomy regulation, EBA Pilar 3, Modern Slavery Act, the Duty of Care Act.

 $\hfill\square$ None of the above

Contributing to the Sustainable development goals :

Leveraging on its geographic presence, the diversity of its businesses and its responsible engagement, Societe Generals has the ambition to contribute to a more sustainable world. Each of the four focus areas of the Group's CSR ambition can be linked to one or several SDG. Societe Generale has a longstanding commitment to fight global warming and has developed a strategic approach to climate change based on three pillars: addressing risks induced by climate change, managing the impact of its activities on climate and supporting clients in their environmental transition, notably by developing financial and advisory solutions aligned to this objective.

Therefore, the four focus areas of the Group's CSR ambition for 2022, Culture of responsibility, Responsible employer, Supporting the environmental transition and Making a positive impact on local communities, are all contributing to 10 SGDs (#1 No poverty; #4 Quality education; #5 Gender equality; #7 Affordable and clean energy; #8 Decent work and economic growth; #9 Industry, innovation and infrastructure; #11 Sustainable cities and communities; #12 Responsible consumption and production; #13 Climate action; #16 Peace, justice and strong institutions).

| Core themes of the Group's CSR ambition | SDG | | | |
|--|----------------|-------------|--------|--|
| Responsible employer Monitoring quality of working life and the diversity and professional development of its teams is crucial to encouraging employee engagement within the Group and optimising performances. Societe Generale has undertaken to move the Group forward with five Human Resources priorities: Corporate Culture and Ethics Principles, Professions and Skills, Diversity and Inclusion, Performance and Compensation, Occupational Health and Safety (see "Being a responsible employer", page 293). | 4 | 5 III. © | : M | |
| Culture of responsibility | | | | |
| This involves the Group factoring in ESG concerns at the very highest levels of governance, rolling out a robust E&S risk management framework, holding itself to account on its commitments in terms of human rights, the climate and biodiversity and ensuring it operates ethically and responsibly in all aspects of its business (see Chapter 5, page 314). | | | | |
| Supporting the environmental transition | Constant State | | - | |
| By assisting clients in transitioning to greener practices through innovative solutions tailored to their evolving needs, Societe Generale is also doing its part to help preserve biodiversity and develop the circular economy while simultaneously aligning its portfolios with a net-zero trajectory. | ×. | 8 | 13 III | |
| Making a positive impact on local communities | | | | |
| This means supporting societal and economic change at a local level, contributing to infrastructure financing and assisting local organisations, SMEs and entrepreneurs, leading the field in sustainable mobility and developing socially inclusive services. | 1.000 | | 9 | |

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- Chapter 1, <u>CSR ambition</u>, page 11
- Chapter 5, <u>Taking action</u> and building a sustainable <u>future together</u>, page 314
- Chapter 5, <u>Aligning our</u> activities with pathways consistent with a maximum temperature rise of 1.5 °C, page 319
- Rolling out a Code of Conduct underpinned by shared values (and human rights), page 345

UN Global Compact

UN Global Compact

Code of conduct

Societe Generale code of conduct

Corporate website

Environmental Social Principles

Human rights

Modern slavery UK act





Taking commitments and joining working groups :

The Group undertakes to operate with the utmost integrity and transparency, and to comply with the applicable laws and regulations in all the countries where it operates.

The Group conducts its operations in accordance with the values and principles set out in the following major international conventions:

- the Universal Declaration of Human Rights and its additional commitments;
- the fundamental conventions of the International Labour Organization (ILO);
- the Unesco World Heritage Convention;
- the OECD (Organisation for Economic Co-operation and Development) Guidelines for Multinational Enterprises;
- the United Nations Guiding Principles on Business and Human Rights

The Bank will comply with standards developed or under development at the EU level such as the EU Taxonomy or the EBA and ECB frameworks.

Societe Generale led or joined in coalitions and supported those that bring new standards.

More broadly, the Group has joined multiple public or private CSR initiatives, among them :

- global CSR commitments : CFO Taskforce of UN Global Compact
- commitments in relation to environment : TCFD, the Equator Principles, the Positive Impact Manifesto and the Principles for Positive Impact Finance (UNEP FI), the Poseidon Principles, the Green Investment Principles, the TNFD Forum, UNEP-FI's Net-Zero Banking Alliance in 2021, the Sustainable STEEL Principles, the Aluminum Climate-Aligned Finance Working Group, the Aviation Climate-Aligned Finance (CAF) Working Group, the Act4Nature alliance etc.





Principle 2: Impact and Target Setting



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.

2.1 Impact Analysis (Key Step 1)

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 fulfil the following requirements/elements (a-d)²:

<u>a)</u> <u>Scope</u>: 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.

| | NERALE'S BUSINESS | IN 2022 |
|--|---|---|
| PRODUCTS ANI | D SERVICES FOR CLIENTS | |
| tate • Third-party prinent management | Financing (EAD of the Corporate | Global Markets activities (Fixed |
| nousing units activities | portfolio | Income and |
| real estate - Life insurance | | Currencies, Equities) |
| ed by EUR 132 billion | EUR 390 billion at | Investor Services |
| | | (Securities Services) |
| EUR 147 billion | and an internet of | Payment Services |
| asset under | Advisory activities | |
| itomotive management | | + Indirect |
| lion vehicles) | | environmental impact |
| Equipment | | through customers' |
| | | business |
| | tate souting units souting units souting units souting units souting units souting units souting units souting units (as of 3112 2022) - Life insurance EUR 132 billion of outstanding EUR 147 billion of outstanding EUR 147 billion is units is units EUR 147 billion asset units tomotive is units EUR 147 billion asset units billion vahicles) | mont management (£AD of the Corporate proving units activities portfolio version of 31.12.2022) 462 m² version of 31.12.2022 version of activities activititities activities activities activities activities activities activ |

URD 2023

- Chapter 4, <u>Risk factors</u>, page 166;
 Chapter 4, <u>Credit risk</u>, page 207;
- Chapter 4, <u>Credit risk</u>, page 207;
 Chapter 4, <u>Analytical approach to</u>
- extra-financial risk factors, page 273;
 Chapter 5, Aligning our activities with pathways consistent with a maximum temperature rise of 1.5°C, page 319;
- Chapter 5, <u>Supporting large</u> corporates in their environmental and
- social transition, page 327;
 Chapter 5, <u>Measuring the objectives</u>
- and expectations of stakeholders, page 335
- Duty of Care Plan, page 361

Societe Generale provides financial products and services to customers in many sectors, and some may expose it to E&S risks.

Being subject to the French legislation on the Duty of care (thereafter Duty of care Law – passed 17.03.2017), Societe Generale has carried out a specific mapping of E&S risks as part of its Duty of Care plan leading to identify specific sectors of its portfolio that might present E&S risks. The last mapping was carried out in Dec. 2021 and is currently being updated based on exposures at FYE 2022.

The E&S mapping is based on Group's exposures to corporates (EAD : 390 GEUR in 2022) on a worldwide basis. This exposure encompasses the exposure on large corporate customers but also a part of SMEs of the French and international retail banking entities of the Groups.

The work consists in identifying E&S risks factors based on external sources (including information on reputation, controversies and expert opinions). It then cross-references the risk ratings obtained with the Group's exposure data in EAD.

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 <u>Interactive Guidance on impact analysis and target setting</u>.





The geographical risk angle is considered through the countries classification of the Equator Principles (Designated and Non-Designated Countries) based on the client's main assets location. This classification reflects the quality of local E&S regulations.

In addition, the Group added ESG risk factors to its risk taxonomy in 2021 and the associated descriptions were revised in 2022 to include physical and transition risks among environmental factors and to incorporate double materiality.

The Group has conducted a specific assessment to identify its extra-financial risks. Based on the results of this assessment, it has ranked its principal extra-financial risk factors according to two criteria : their potential severity and how likely they are to materialise. In doing so, the assessment considered intrinsic risk, i.e. the risk level before any steps are taken to minimise its impact. A time frame was applied to certain risk factors, in that a risk may be perceived as low today but intensify in the future.



exposure or industry breakdown in %), and/or

deographical scope



Banking

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. The credit portfolio presents a diversified profile. As of 31 December 2022, **URD 2023** • Chapter 4, <u>Credit risk</u>, page 207; exposure to credit and counterparty risk represented an amount of EAD of Outstanding amounts and impairments 1,119 billion euros, up (+4%) compared to the end of 2021, driven in by geographical region, Chapter 6, page particular by the increase of "Sovereigns" exposures. 459) The breakdown of the portfolio between main customer categories is Mapping of environemental impacts, balanced: Sovereigns (29%), Corporates (32%), Retail customers (20%), Chapter 4, page 274) Institutions (9%) and Others (10%). In terms of geographic breakdown of the portfolio, exposure to emerging Risk Report 2022 countries remains limited: the Group's exposure is 70% in Western Europe Chapter 6.5 Quantitative information, (including 48% in France) and 14% in over North America. page 118 Chapter 6.6 <u>Additional quantitative</u> information on credit risk, page 138 At 31 December 2022, the Corporate portfolio amounted to EUR 390 billion Chapter 14.3, <u>Quantitative information</u> out of a total of EUR 1,119 billion for the group (on- and off-balance sheet on ESG Risks, page 262; exposures measured in EAD). Chapter 1.2 Credit and Counterparty Risk, page 8 SECTOR BREAKDOWN OF GROUP CORPORATE EXPOSURE ON TOTAL GROUP EXPOSURE (BASEL PORTFOLIO) Financial services 6.9% Real estate 3.5% Utilities⁽¹⁾ 2.8% Manufacturing industries 2.2% Telecoms, media and technology 2.0% Agriculture, food industry⁽²⁾ 1.8% Oil and gas industry 1.8% Heavy industry and mining²³ 1.7% Automotive 1.6% B2B and B2C services 1.4% Aviation and defense 1 1 1% Retail trade excluding automotive 1.1% Construction and civil engineering 1.1% Oil and gas trading 1.0% Conglomerates 1.0% Shipping and cruise 1.0% Land transport and logistics 0.8% Pharmaceuticals, health and social work 0.8% Hotels, catering, tourism and leisure 0.5% Others 0.5%

b) Portfolio composition: Has your bank considered the composition of its portfolio (in %) in the

i) by sectors & industries³ for business, corporate and investment banking portfolios (i.e. sector

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

analysis? Please provide proportional composition of your portfolio globally and per

³ 'Key sectors' relative to different impact areas, i.e. those sectors whose positive and negative impacts are particularly strong, are particularly relevant here.

8





Principles for Responsible Banking

<u>c)</u> <u>Context</u>: 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?⁴ 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.

In evaluating the E&S impacts materiality of the Group's portfolio, Societe Génerale paid a particular attention to specific local challenges. This evaluation was supported by the dialogue with external stakeholders (NGOs, international or regional initiatives, regulators, clients or investors) and the consideration of material E&S controversies.

The Group is attuned to and engages in dialogue with NGOs that alert it to E&S issues. Societe Generale centralizes in its Sustainable Development Department the communication or contact with NGOs or other stakeholders informing it about the E&S impact of its financing services or other services. In the course of 2022, Societe Generale consulted with or participated in working groups with some ten NGOs, either in writing, through bilateral meetings or through broader, more global consultations organised by the associations themselves or by the French Banking Federation (Fédération bancaire française – FBF), Entreprises pour les Droits de l'Homme (businesses for human rights), Entreprises pour l'Environnement (businesses for the environment), Institute for sustainable finance and UNEP-FI, amongst others.]

It enables the Group to identify key region-specific challenges to be addressed like oil extraction in Ecuadorian Amazon or in the Arctic, deforestation (with a specific focus on soy and beef sectors in South America and Palm oil) or forced labor issues (with a focus on most sensitive regions).

On a more global perspective, climate-related impacts remained at the top of the Group's preoccupations, as well as the consideration of the Group's impacts on nature.

In addition to this broad framework, Societe Generale applies a comprehensive approach to incorporating CSR considerations (incl. postive and negative impacts identification) when considering the provision of products and services:

- Front officers auto-evaluate at origination their transactions thanks to a dedicated questionnaire "PI-SAT" allowing them to assess its social, environmental and economic impacts (understood as the effect or change (negative or positive) produced by a project, activity or financed entity). The positive impact must be proven/demonstrable/traceable, delivered efficiently and consistent with the size of the investment (acceptable cost to impact ratio).
- Project financings are evaluated in terms of local impacts on the environnement and on human rights in the frame of the Equator Principles and in line with the IFC standards. The impact on protected area are systematically checked thanks to the tool IBAT.
- The reputation risk potentially associated to clients or transactions is qualified in the frame of the E&S evaluation, based on material controversies.

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- Chapter 1.3, <u>A strategy of profitable</u> and sustainable development, based on a diversified ans integrated banking model, pages 11 and following
- Chapter 4, <u>Incorporating the</u> <u>environment in the Risk</u> <u>management framework</u>, pages 279 and following
- Chapter 4, <u>Analytical Approach to</u> <u>Extra-Financial Factors</u>, pages 273
- Chapter 5, <u>Measuring the objectives</u> and expectations of stakeholders, page 335

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





Principles for Responsible Banking

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)⁵? Please disclose.

As results of the 2021 E&S impacts mapping, the industries most vulnerable to E&S risks are energy (fossil fuels and electricity generation), transport and logistics (especially automotive and aerospace), agriculture, especially upstream (although risk has decreased dramatically in the soya business), industry, construction, chemicals, mining, forestry, textiles and defence.

Approximately 25% of the Group's exposure (corporate) at the end of 2021 related to sectors that were found to present high risks in terms of human rights and the environment. Once geography is taken into account, less than 10% of the Group's business as measured in terms of sector exposure is conducted in sectors and countries found to present E&S risks.

The main risks identified in these sectors include higher climate risks, erosion of biodiversity, risks related to working conditions (including workplace accidents), risks of forced labour and child labour, and the risk of breaching community rights.

On this basis, the Group decided to focus its action on climate change mitigation and biodiversity preservation to pursue its target setting strategy. They are supported by the Group's willingness to monitor its positive impact and support for its clients.

Supporting the environmental transition is one of the 4 main priorities of its CSR ambition for 2025.

Alongside these two environmental prioritized areas, the Group recognizes its social potential negative or positive impacts, that are often closely interlinked with climate and biodiversity. It will pursue its efforts in that space, notably through the evaluation of its clients and transactions. The contribution of the Group to local communities is one of the 4 main priorities of its CSR ambition for 2025. Furthermore, the group works on human rights notably reinforce force labour topics.

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- Chapter 1, <u>CSR ambition</u>, page 11
- Chapter 2, <u>Extra-financial report</u>, pages 48
- Chapter 4, <u>Analytical Approach to</u> <u>Extra-Financial Factors</u>, pages 273
- Chapter 5, <u>Aligning our activities</u> with pathways consistent with a maximum temperature rise of 1.5 °C, pages 319
- Chapter 5, <u>Supporting positive</u> <u>change</u>, pages 325 and following
- Chapter 5, <u>Duty of Care Plan –</u> <u>Group's activities</u>, pages 363 and following

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 Chapter 14, <u>Environmental, social</u> and governance (ESG) risks, pages 255 and following

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.





<u>d</u>) For these (min. two prioritized impact areas): <u>Performance measurement</u>: 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 <u>Annex</u>.

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.

The Group uses a range of tools and indicators to measure, manage and mitigate climate and nature related risks :

On Climate change mitigation:

- Alignment measures : As a Founding Member of the UNEP-FI's Net-Zero Banking Alliance, Societe Generale has committed to:
 - aligning its portfolios and activities with pathways consistent with a maximum temperature rise of 1.5 °C;
 - setting itself targets to be met by 2030 (or sooner) and 2050;
 - focusing as a priority on its most emission-intensive sectors that will have a major impact in transitioning towards a low-carbon economy;
 - basing its alignment targets on credible climate scenarios published by recognised bodies;
 - being transparent, through annual reporting on its progress and action plans.

To define alignment measures, the Group aims to develop metrics expressed as outstanding loans, as carbon intensity or as absolute financed carbon emissions. These metrics, defined in relation to macroeconomic scenarios aimed at limiting global warming to 1.5°C, make it possible to aggregate an internally monitored measurement to manage alignment.

In 2018 Societe Generale signed the Katowice commitment alongside four other international banks. These signatory banks have been working with the 2°C Investing Initiative (2DII) on adapting the PACTA (Paris Agreement Capital Transition Assessment) methodology. And for sectors : specific méthodo. In parallel, the Group used the Partnership for Carbon Accounting Financials (PCAF) methodology to measure the greenhouse gas emissions of 95% of its loans to major companies in 2022. The calculations are currently based on monetary emission factors in the PCAF database, and when the data are available, the calculations are based on the scope 1, 2 and 3 emissions reported by clients.

The plan to align Societe Generale's loan portfolios was implemented following a decision by the Responsible Commitments Committee (CORESP) in August 2019. This plan aims

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- Chapter 2, <u>Drivers of positive</u> <u>transformation</u>, page 48;
- Chapter 5, <u>Aligning our activities with</u> pathways consistent with a maximum temperature rise of 1.5 °C,
- Chapter 4, incorporing the environment in the risk management framework, page 279 and following;

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 Chapter 14, <u>Environmental, social and</u> <u>governance (ESG) risks</u>, pages 255 and following





to define indicators and identify scenarios to manage the Group's activities in keeping with its commitments to fight climate change. The project is supervised by the Chief Sustainability Officer and jointly governed by the relevant Business Unit heads. CARBON FOOTPRINT Identification of the most carbon-emissive ALIGNMENT Setting targets to decarbonise the portfolio ectors Goals Poseidon Princip PACTA/Katowice NZ Steel Initiative French Banking Federation's Under development approach Coal, oil and gas, power generation, cement, cars Other priority sectors, based on the level of absolute Portfolio Shipping Residential real Steel All corporate lending portfolio sectors Tools to assess the climate vulnerability of its counterparties (the Corporate Climate Vulnerability Indicator or CCVI), the industries in which its clients operate (the Industry Climate Vulnerability Indicator or ICVI) and sovereigns (the Sovereign Climate Vulnerability Indicator or SCVI). The CCVI focuses particularly on transition risks, whereas the ICVI assesses both transition and physical risks. The Group uses both the CCVI and ICVI in various sectors. E&S guidelines and general policies: the Group has developed an E&S risk management framework based on its E&S General Principles and sector policies (Oil & Gas, Mining, Thermal Power stations, Industrial Agriculture and forestry, Dams & Hydrolectric power, Shipping, Civil Nuclear power). Some E&S sector policies include E&S exclusion criteria designed to exclude from the Group's activities certain types of corporate client, issuer, banking or financial product or specific service or transaction that are associated with underlying practices or activities that are damaging to the environment and/or human rights to such an extent or in such a way that improvement within a reasonable timeframe is not possible. In terms of disclosure, the Group uses the risk terminology suggested by the Task Force on Climate-related Financial Disclosure (TCFD) to describe climate, and by extension, environment risks: physical risks and transition risks. The group is publishing a cross-reference table of TCFD : https://www.societegenerale.com/sites/default/files/documents/20 23-03/2023-Universal-Registration-Document EN.pdf#page=355 **On biodiversity preservation:** In the frame of its E&S risk management framework, E&S policies on sectors deemed sensitive from a biodiversity point integrate specific exclusion and evaluation criteria on biodiversity, applicable to clients and transactions : Oil & Gas, Mining, Thermal Power stations, Dams & Hydroelctric power, Shipping, Industrial Agriculture and forestry (that includes specific appendixes on Palm oil, Soy and beef in South America, Fisheries and aquaculture, Forestry and a global commitment to tackle deforestation). In order to capture the physical risk linked to the dependance upon the ecosystem services and the transition risk associated to impacts on biodiversity, the ambition is to set up an industrial biodiversity vulnerability indicator (Industry Biodiversity Vulnerability Index - IBVI). This new indicator will follow the same approach as the ICVI and will be introduced in 2023.





| - | The Group is part of the Taskforce on Nature-related Financial |
|---|---|
| | Disclosures (TNFD) forum and to the French consultation group |
| | and is closely following the iterations of the framework proposed |
| | by the taskforce. |

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: | \Box Yes | ⊠ In progress | 🗆 No |
|--------------------------|------------|---------------|------|
| Portfolio composition: | \Box Yes | ⊠ In progress | 🗆 No |
| Context: | \Box Yes | ⊠ In progress | 🗆 No |
| Performance measurement: | \Box 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, biodiversity preservation

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

- Up to 6 months prior to publication
- \Box Up to 12 months prior to publication
- Up to 18 months prior to publication
- □ Longer than 18 months prior to publication

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 targets⁷ 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:

<u>Alignment:</u> which international, regional or national policy frameworks to align your bank's portfolio with⁸ 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.

On Climate change mitigation:

By joining the UNEP-FI's **Net-Zero Banking Alliance** in 2021 as a founding member, the Group committed itself to align its portfolios on trajectories aimed at global carbon neutrality by 2050 in order to reach **the objective of the Paris Agreement of limiting global warming to 1.5°C**.

In this perspective, we considere the Group's CSR ambition for 2022 Group contribute, for the financing period, **to the SDGs 7, 12, 13.**

In addition, the Group joined a number of working groups and coalitions in 2022 to develop common methodologies and continue to chart a course for decarbonising its credit portfolios.

- Societe Generale joined the <u>Aviation Climate-Aligned Finance (CAF) Working</u> <u>Group</u> as a founding member, alongside five other top global banks involved in financing the aviation industry. They will work together to define common goals by end-2022 to speed up decarbonisation of the sector.
- Turning to the role that lenders play in decarbonising the aluminium sector (which represents 2% of planet-heating emissions per year), the Group is a founding member of the **Aluminum Climate-Aligned Finance Working Group**, partnering with the Rocky Mountain Institute's (RMI) Center for Climate-Aligned Finance and the main lenders to the sector to help decarbonise the aluminium sector. The working group will put together a climate-aligned finance framework. By joining the CAF framework, participating lenders will assess progress against climate targets by assessing to what extent the emissions associated with their aluminium portfolios meet the 1.5°C target, according to the guidelines issued by the Net-Zero Banking Alliance, convened by the United Nations.
- To align steel lending portfolios with net zero targets, the Group signed up to the <u>Sustainable STEEL Principles</u> (SSP), the first climate-aligned agreement for the steel industry. The SSPs are a solution for measuring and disclosing the alignment of steel lending portfolios with the goal of limiting global warming to 1.5°C or below.

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- Chapter 2, <u>Drivers of</u> <u>positive transformation</u>, page 48;
- Chapter 2, <u>Managing ESG-related risks and meeting commiments to human rights, climate and biodiversity</u>, page 52;
- Chapter 4, Incorporating the environment in the risk management framework, page 275,
- Chapter 5, Aligning our activities with pathways consistent with a maximum temperature rise of 1.5°C, page 319
- Chapter 5, <u>Supporting</u> positive change, page 325.

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CSR Commitments





On biodiversity preservation:

The Group is striving to contribute, for the financing period, **to the achievement of the SDGs** 12 responsible consumption and production, 14 life below water, 15 life on earth.

Biodiversity is critical to environmental sustainability. And Societe Generale has stepped up its pledge to protect biodiversity as part of its broader approach of environmental transition. Alongside its clients, the Group is taking an active role in coalitions, alliances and working

groups to develop common standards and methodologies :

- the **Taskforce on Nature-related Financial Disclosures** (TNFD), an international taskforce formed to develop a framework for managing and reporting nature-related risks so that organisations (including financial institutions) can understand and measure these risks and incorporate them in their strategy;
- the **Science-Based Targets Network** (SBTN) is a global network that aims to provide companies with science-based information to manage their impacts and dependencies on nature across their entire value chain;
- the **Finance for biodiversity Pledge** is an initiative of 26 financial institutions calling for and committing to action to protect and restore biodiversity through their activities.

Societe Generale will follow the work of the above-mentionned initiatives on the **new Global Biodiversity Framework** adopted in Montreal.

Furthermore, Societe Generale, a member of the Act4Nature alliance, made 18 new commitments in favour of biodiversity in November 2022.

Contribution to the environmental transition

To monitor its positive impact and support for its clients, the Group developed a standard several years ago to measure the distribution of its Sustainable and Positive Impact Finance offer – SPIF* products for lending to the economy and companies, together with a range of Sustainable and Positive Investment (SPI*).

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.





Principles for Responsible Banking

b) <u>Baseline:</u> 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 <u>Annex</u> 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:

| Impact area | Indicator code | Response |
|------------------------------|--|---|
| Climate change mitigation | A.1.2 Paris alignment target | URD 2023 Chapter 5, <u>Supporting positive change</u> , page 325. Chapter 5, <u>Aligning origination</u> policies and credit portfolios in various sectors, page 320 |
| | A.1.5 Business opportunities and financial products: Has your bank developed financial products tailored to support clients' and customers' reduction in GHG emissions | URD 2023 Chapter 2, <u>Drivers of positive transformation</u> , page 48; Chapter 5, <u>Supporting positive change</u> , page 325. |

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.

| ndicator | Scenario | Baseline | Target | Reduction target | End of 2021 | Actual 2021 | transformation, page 48; |
|--|---|---------------|----------------------------|---------------------|-------------|-------------|--|
| Thermal coal gross commitments index 100) | Exitstrategy | 100 (2019) | 0 (2030/40 OECD/RoW) | -100% | 72 | -28% | Chapter 5, <u>Aligning origination</u> policies and credit portfolios in various sectors, page 220 |
| il and gas extraction gross ommitments (index 100) | Oil & gas production 2050 IEA NZE | 100 (2019) | 80 (2025) | -20% | 82 | -18% | page 320 Corporate website |
| ower generation emissions intensity gCO₂e/kWh) | Emissions intensity 2050 NZE (gCO2e/kWh) | 221 (2019) | 125 (2030) | -43% | 143 | -35% | Annual information on alignment |
| hipping industry emissions intensity alignment disparity target ^{າຍ} | Emissions intensity, IMO Objective 3 (gCO2/tnm) | +23% | 0% (2050) | N/A | +15% | N/A | |
| eliveries of passenger cars by ALD utomotive in Europe, emissions itensity expressed in NEDC gCO ₃ /vkm) | n/a | 116 | 70 (2025) | -40% | 99 | -15% | |





<u>c)</u> <u>SMART targets</u> (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.

On Climate change mitigation:

New 2022 commitments to progressively align our credit portfolios with trajectories compatible with a 1.5°c scenario:

- Oil and Gas:
 - reinforced objective to reduce exposure to the oil and gas production sector in terms of financial exposure by 20% by 2025;
 - reduce by 30% by 2030 the absolute carbon emissions target concerning the end-use of oil and gas production (relative to 2019);
- **Power generation**: reduce the carbon intensity of exposure to the power generation sector to 125g of CO2 per kWh by 2030.

On biodiversity preservation:

Societe Generale, a member of the Act4Nature alliance, made **18 new** commitments in favour of biodiversity in November **2022**. They concern:

- **Governance and training**. The Group has committed to integrating biodiversity issues into its governance to define and implement the Group's ambition on the subject by presenting these issues at least once annually to the Committee in charge of Responsible Commitments, chaired by General Management.

In terms of training, Societe Generale has committed to develop Group employees' knowledge on biodiversity issues by informing them of the Group's commitments and of dedicated training sessions on these topics;

- **Risk management**. In addition to the Equator Principles and in application of updated sector policies, Societe Generale has committed not to finance
 - dedicated projects located in IUCN I-IV sites, RAMSAR wetlands, UNESCO World Heritage sites or Alliance for Zero Extinction sites, for the following sensitive sectors: oil and gas exploration and production, mining extraction, upstream industrial agriculture, reservoir dams, thermal power plants, shipyards;
 - projects dedicated to oil exploration and production in the Arctic; and
 - transactions dedicated to the exploration, production or trading of oil from the Equatorial Amazon as from 2022;
 - **Client relationships**. Since 2022, Societe Generale has furnished two new commercial solutions formed in conjunction with expert partnerships to promote reforestation and help foster biodiversity. To help its large corporate clients assess and reduce their impact on biodiversity, the Group has expanded its E&S assessment by including a point of emphasis on biodiversity to cover 100% of large corporate clients by 2024. As for its SME clients in France, from 2023 the Group will propose an E&S interview guide incorporating a biodiversity component to foster dialogue on environmental issues

URD 2023

- Chapter 2, <u>Drivers of positive</u> <u>transformation</u>, page 48;
- Chapter 5, <u>Biodiversity</u>, page 318.
- Chapter 5, <u>Aligning origination</u> policies and credit portfolios in various sectors and methodology, page 320
- Chapter 5, <u>Supporting positive change</u>, page 325.

Commitment

Act4nature commitment

⁹ Key Performance Indicators are chosen indicators by the bank for the purpose of monitoring progress towards targets.





and will train 100% of its client relationship managers on biodiversity. For the SME clients of its African subsidiaries, the Group will raise awareness of biodiversity through the SME Centres. Societe Generale will provide its individual customers in France with an educational tool on responsible consumption (food, clothing, transport, etc.). Last, with respect to its real estate development activities, Sogeprom is working to obtain certifications such as Effinature and Biodivercity® for residential projects with a green area larger than 500m, to promote the use of biosourced materials in its real estate projects in France, and to consider the increased use of wood in partnership with REI PROMOTION. This collaboration focuses on co-developing housing projects and managed residences;

These commitments to integrate biodiversity into the Group's global strategy and activities have been **recognised as SMART** by the act4nature international <u>multi-stakeholder</u> steering committee.

Last, in 2022 **the Group began dialogue with client companies operating in the most sensitive deforestation sectors** - palm oil, soya and South American cattle - to assess their strategies to combat deforestation. As from 2023, the Group will only supply financial products and services to clients that have committed to:

- eliminate deforestation and land conversion in their activities, in their own operations and across the supply chain;
- implement and systematically require traceability of their value chains, and annually report on the progress made in terms of implementation and/or the proportion of activities that do not involve deforestation or land conversion.

Moreover, the Group has refused since 2022 to get in touch with prospective clients operating in the palm oil, soya and South American cattle sectors, and which have not committed to eliminate deforestation and land conversion in their activities in their own operations and across their supply chain, or to systematically trace their value chain.

Contribution to the environmental transition

Building on an improved product offering, and having achieved our target contribution to the energy transition ahead of schedule (EUR 157 billion at the end of 2021 vs. an initial target of EUR 120 billion in the period 2019–2023), Societe Generale has set a **new target of a EUR 300 billion contribution to sustainable finance between 2022 and 2025**, applicable to all business lines for both environmental and social issues. The Group's contribution at end-2022 was EUR 100 billion, or one-third of the target.





<u>d</u>) <u>Action plan:</u> 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.

The monitoring of CSR target implementation relies on different things, amongst which :

Target definition:

• The General Management, through two specialised committees, the CORESP and the Group

Strategic Committee (CSG), defines Societe Generale's strategic targets and non-financial

performance indicators.

Target monitoring:

• Business Units as well as the 2nd line of defence (Risk and Compliance Departments) have

set appropriate CSR targets in their CSR roadmaps to implement the Group's CSR

commitments. Progress against the various targets is assessed at least annually;

 Long term targets are more and more often supplemented by short-term and mid-term

targets and some sector policies have been reviewed to explicitly mention related targets and deadlines (e.g., the oil & gaz policy)

 Most of the targets (their definition, calculation methodologies and results) are verified

annually by an independent verifier

Furthermore, to underpin this approach, a specific programme was introduced to step up operational implementation of the transformation: ESG by Design,

And the annual variable remuneration and long term incentive of the board of directors includes some ESG criteria.

On Climate change mitigation:

In order to align our portfolios with trajectories compatible with 1.5°C climate targets, we align our origination policies and credit portfolio on various sector :

- Coal : In 2019, the Group took its commitments up a level by announcing its target to reduce exposure to coal to zero by 2030 in EU and OECD countries, and by 2040 elsewhere. To achieve this, Societe Generale published a new sector policy for coal in July 2020.
- Power : after having set a first target on CO2 emission intensity of the power production portfolio in 2020, the Group has set in 2022 a stricter target to reduce the CO2 emissions intensity by 2030. The goal will be achieved by adjusting the financed energy mix, reflecting both its decision to exit the coal sector and positioning itself as a leader in renewable energies.
- Oil & Gas : In 2022, the group has updated its Oil and Gas E&S Policy and alignment target, to take into account the definition of exclusions of non conventional extraction techniques and the withdrawal from reserve-based lending for onshore assets in the Unites States.

URD 2023

- Chapter 2, <u>ESG By Design</u>, page 48
- Chapter 3, <u>Long Term incentive</u>, page 129
- Chapter 4, <u>Environmental and social</u> (E&S) General Principles and sector policies, page 275.
- Chapter 4, <u>E&S Risk Management lines</u> of defense, page 274,
- Chapter 4, <u>Incorporating the</u> <u>environment in the risk management</u> <u>framework</u>, page 275,
- Chapter 5, <u>Aligning origination</u> policies and credit portfolios in various sectors, page 320
- Chapter 5, <u>Credit portfolio Alignment</u> <u>Key Figures</u>, page 322.
- Chapter 5, <u>Supporting positive change</u>, page 325.
- Chapter 5, <u>Independant their party's</u> report, page 358.

Corporate website

Mining Sector Policy Thermal Coal Sector Policy Oil & Gas Sector Policy





Societe Generale has committed to setting a series of alignment targets on priority sectors before April 2024.

On biodiversity preservation:

In order to confirm the credibility of the commitments taken in the frame of the act4nature alliance, the Group will publicly report on the implementation of their commitments within two years.

In addition, associated sector policies have been updated and reinforced to ensure their application when provisioning banking or financial products and services.

In order to ensure the applicability of the E&S risk management framework, and e-learning module on E&S risk management has been developped. Training had been made compulsory for staff in direct or indirect contact with corporate clients and is now available as an optional module for all staff. The module covers the scope, governance and main stages in managing E&S risks: identifying and assessing risk and ensuring action plans.

Contribution to the environmental transition

For measuring it contribution to Sustainable finance (Group objective of EUR 300 bn) Societe Generale continuously reinforces its process of evaluation of environmental and social impact on clients and transactions. Each time the Group consider granting a loan, all the ESG analysis process (described in Societe General URD 2023, chapter 4.14) is applied to take into account in credit authorization positive and negative impacts of the transaction.

The Group's commitment to contribute EUR 300 billion to sustainable finance between 1 January 2021 and 31 December 2025 is part of the Long Term Incentive plan for 2022 of the variable remuneration of the general management.

| | first area of most significant impact: <i>Climate change</i> <i>mitigation</i> | second area of most significant impact: <i>Biodiversity preservation</i> |
|---------------|--|--|
| Alignment | 🗆 Yes | □ Yes |
| | ⊠ In progress | ⊠ In progress |
| | □ No | □ No |
| Baseline | □ Yes | □ Yes |
| | ⊠ In progress | ⊠ In progress |
| | 🗆 No | □ No |
| SMART targets | 🗆 Yes | □ Yes |
| | ⊠ In progress | ⊠ In progress |
| | 🗆 No | □ No |
| Action plan | □ Yes | □ Yes |
| | ⊠ In progress | ⊠ In progress |
| | □ No | 🗆 No |





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.

The monitoring of CSR target implementation relies on different things, **URD 2023** amongst which : Chapter 5, Aligning origination policies **Target definition:** and credit portfolios in various sectors, page 320 - The General Management, through two specialised committees, the Chapter 2, Drivers of positive CORESP and the Group Strategic Committee (CSG), defines Societe transformation, page 48; Generale'sstrategic targets and non-financial performance indicators. Chapter 5, Supporting positive change, page 325 Chapter 5, Duty of Care plan -**On Climate change mitigation:** developing and applying sector policies, **Ongoing targets:** page 369 • Establish alignment on NZBA priority sectors: the Group has already defined targets on coal, oil&gas, power generation, ALD (transport) and shipping (transport). Towards a complete exit of coal (exit in 2030 in OECD countries and 2040) elsewhere): on track. Oil and gas extraction – reduction in exposure by at least 20% in absolute terms by 2025: on track. Power generation : on track **On biodiversity preservation:** the Group's "Industrial agriculture and forestry" sector policy (section 5.3) includes a commitment to start dialogue with corporate clients active in the soya and cattle sectors in South America and in the palm oil industry (producers, traders and primary processors): • this process of dialogue, which culminated in a review of the relevant clients to assess their alignment with the sector policy criteria on combating deforestation is due to be applied as of January 2023, • to continue to provide financial products and services after January 2023, the Group verified that these clients have undertaken to (i) eliminate deforestation and land conversion from their activities (for their own operations and across their supply chains), and (ii) set a target of 100% traceability in their value chains, reporting annually to the Group on progress towards meeting this goal. This has already led to the Group ruling out the supply of new products and services to a number of clients.





Contribution to the environmental transition Supporting positive change SUSTAINABLE FINANCE PRODUCTION (IN EURBN) SUSTAINABLE BOND ISSUES LED BY SOCIETE GENERALE (IN EURBN) 118 18.5 113 16 12.6 2021 2022(1) 2021(2) 2022 Social/societal
 Green or contributing to the energy transition Market support (1) Data including the more stringent criteria in 2022 concerning the scope of products considered. (2) 2021 data revised to include social BREAKDOWN OF ENVIRONMENTAL SPIF PRODUCTION (2022) BREAKDOWN OF SOCIAL SPIF PRODUCTION (2022) Other social projects 4% Other environmental projects 15% Education and job creation 9% ٦ Renewable energy infrastructures 33% Health 29% Loans to local authorities and similar 20% Sustainable mobility 22% €5.6bn €10.4bn Social housing 6% Loans to SMEs to encourage jobs 17% Sustainable buildings 30% Access to IT infrastructure 15%





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

S

Does your bank have a policy or engagement process with clients and customers¹⁰ in place to encourage sustainable practices?

 \boxtimes Yes \Box In progress \Box No

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

 \boxtimes Yes \Box In progress \Box 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 activities¹¹). 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).

In order to promote responsible relationships with its clients, the Group relies on :

- Its Code of conduct, distributed to all employees, which sets the ethical basis of the bank's activity. It presents, among other things, client protection measures. It defines client complaint treatment to which is attributed a specific governance, policies, procedures and a dedicated team within each Business Units and Service Units
- Mediation explained to front officers. Clients are regularly informed about this
 option too. Internal rules, related to products governance, consulting practices
 conflicts of interest and remuneration have also been strengthened
- Data protection and cybersecurity policies that are deployed within the bank to protect the clients.
- All bank's staff receive regular training on the Code of conduct but also on data protection and cybersecurity.
- In line with its Environmental and Social General Principles, the Group proposes financial products and services to all customers pursuant to French law, which penalises all forms of **discrimination**. These obligations are transposed into the Group's standards documentation (Societe Generale Code) and its Code of Conduct and must be complied with by all permanent and temporary employees. Societe Generale's standards documentation makes specific reference to discrimination and extends compliance with French law to all entities; it states that situations involving the rejection of a client's request may not be motivated by discrimination based on gender, ethnic origin or religion.
- The E&S assessment of the clients consists of identifying the E&S challenges arising from the client's sectors and location of activities or controversies, and then, for the riskiest ones, assessing the client's ability to manage these risks (CSR organisation, practices and maturity, management of E&S controversies

URD 2023

- Chapter 2, <u>Anchoring a</u> <u>culture of repsonsability</u>, page 53
- Chapter 4, <u>Managing ESG-</u> related risks in the Group's <u>activities</u>, page 275
- Chapter 5, <u>Supporting</u> positive change, page 325.
- Chapter 5, <u>A marketing policy</u> that takes the client's interests into account, page 339.
- Chapter 5, <u>Duty of Care Plan</u>, page 361.

Corporate website

Environmental Social Principles Equator Pinciples Report 2021

<u>9 sectorial policies</u>

- Industrial Agriculture and Forestry – February 2022
- Dams and hydroelectric power - November 2021
- Thermal power plants -November 2021
- Thermal coal July 2020
- Defence and Security -February 2020
- Mining November 2021
- Shipping November 2021





 Civil Nuclear Power -September 2014

• Oil and gas - January 2022

and dialogue with stakeholders). This assessment can lead to intensive dialogue with the clients and specific actions (e.g., making a specific commitment with an existing client to improve its E&S practices). As part of the E&S clients' review, the E&S sector policies define three sets of criteria for each of the above-listed categories: E&S exclusion criteria; E&S priority assessment criteria & other E&S assessment criteria are designed to identify other risk factors associated with the sector in question (more information in the URD 2022)

Adopted by the Group in 2007 and since revised several times, the Equator **Principles** are one of the initiatives underpinning Societe Generale's E&S General Principles. As an EP Financial Institution (EPFI), Societe Generale has committed to implement the EP in its internal E&S policies, procedures and standards and to refrain from providing loans falling within the scope of the initiative which do not comply with the EP. This strong commitment is supported by robust internal procedures, tools and competence. In their latest version, dubbed the EP4, which entered into force on 1 October 2020, the Equator Principles serve as a common framework for the financial sector and are designed to help signatories) identify, assess and manage the E&S risks associated with the major infrastructure projects they advise on and finance.

The regulations concerning client protection and efforts to combat discrimination, have been further communicated and detailed through internal website in 2021, as part of the measures to raise employee awareness in concerns:

- MiFID 2 regulation; .
- Insurance Distribution Directive (IDD);
- Products and Services offering;
- Protection of retail customers;
- . Conflicts of interest - customers;
- Protection of customer assets:
- Customer complaints; .
- Employee compliance.
- Providing training and establishing an ESG culture are seen as key in the ongoing discussions with clients to encourage sustainable practices. The range of training courses was reviewed in 2022 to sharpen the focus on CSR skills. Structured around six priorities (ESG fundamentals, ESG risks and analysis, the energy and environmental transition, sustainable IT, social and green financing, and positive-impact investments). At the end of 2022, more than 65% of staff had completed an ESG training course and 7,500 people had taken part in the Climate Fresco workshop.

Pursuing dialogue with clients

The E&S assessment of the clients consists of identifying the E&S challenges arising from the client's sectors and location of activities or controversies, and then, for the riskiest ones, assessing the client's ability to manage these risks (CSR organisation, practices and maturity, management of E&S controversies and dialogue with stakeholders). This assessment can lead to intensive dialogue with the clients and specific actions (e.g., making a specific commitment with an existing client to improve its E&S practices). These discussions often cover Societe Generale's commitments (including E&S policies) applicable to the client.

To have the tools to measure and track its positive impact and progress in guiding its customers, the Group developed a standard several years ago to measure the distribution of its Sustainable and Positive Impact Finance offer – SPIF* (see Glossary,

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.





page 683) products for lending to the economy and companies, together with a range of Sustainable and Positive Investment (SPI* (see Glossary, page 683) products. We have revised the SPIF and SPI standards and the data collection scope to reflect changes in the Group.

Societe Generale has set a new target of a EUR 300 billion contribution to sustainable finance (SPIF) between 2022 and 2025, applicable to all business lines for both environmental and social issues. The Group's contribution at end-2022 was EUR 100 billion, or one-third of the target.



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 responsible bank, Societe Generale strives to help its clients on their pathway to a just, green and inclusive transition, in line with its own commitments. Sustainability concerns are an integral part of the services offered to all the Group's clients, covering corporate and investment banking as well as financial services. By placing sustainability high on the agenda, the Group aims to meet the increasing demand from the full gamut of stakeholders around the world - clients, corporates, investors and individuals - for banking with a positive impact on the economy and society overall. To achieve our aim of ensuring full client satisfaction and meeting their needs as closely as possible, Societe Generale carefully tailors its service offering by client category. Reflecting this goal, the Group's teams assist large corporates in their environmental and social transition. Its retail bank puts the expertise of its teams at the service of local businesses and entrepreneurs to offer them the right supports, tailored to their environment. The Group is also keenly aware of the needs of its **individual clients to take action** and has developed a range of responsible products and services to promote responsible behaviour. Finally, reflecting its spirit of innovation, Societe Generale seeks to get behind new trends in society and pays special attention to the growing interest in sustainable mobility and to new housing modes.

To build in this ESG approach with our clients, the Group has developed a suite of impact-based finance* products.

Societe Generale already accounts for its contribution to sustainable finance (EUR 300 billion between 2022 and 2025). On and off its own balance sheet along with activity in issuing green, social and sustainable bonds, with more than 370 bond issuance mandates managed since 2013 for a total issuance volume of more than EUR 400 billion.

At 31 December 2022, the Group had issued a total volume of EUR 8.874 billion in sustainable and positive bonds since 2015.

In 2022, Societe Generale and Crédit du Nord launched a comprehensive support framework for companies, SMEs, associations and local authorities to enable them to develop a more sustainable model.

The Group gives priority to developing local economies through its support for SMEs and entrepreneurs. In tandem with setting up its new retail bank in France, Societe Generale launched a specific new resource for this client segment which entails new advisory and financing solutions offered together with its leading partners. The main components of this offer are:

- environmental and social loans (Prêt Environnemental et Social, PES) to fund environmental and social sustainability projects. PES loan origination totalled EUR 443.5 million in 2022;
- positive impact loans in partnership with EcoVadis and EthiFinance for companies, organisations and locales or regional authorities to offer finance solutions that incorporate an ESG indicator and a target for this indicator;



- Chapter 1, <u>CSR ambition</u>, page 11
 Chapitre 2, <u>Extra-Financial Report</u>,
- page 48
 Chapter 5, <u>Supporting positive</u> <u>change</u>, page 325

SPI Positive Impact Bond Framework SPIF reporting 2021







- a dedicated photovoltaic and wind energy team to handle financing of these projects; p partnership with LUMO, a Societe Generale subsidiary, the crowdfunding platform helping clients secure funding for environmental and social impact projects;
- connecting Group customers with leading organisations, such as EcoVadis, Ethifinance and Carbo for CSR expertise;
- local support system in the regions, based on key contacts.

On the international stage, the Group's objective is to double its credit exposure to African SMEs between 2020 and 2025. In 2022, the figure totalled EUR 430 million.





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 groups¹²) you have identified as relevant in relation to the impact analysis and target setting process?

 \boxtimes Yes \Box In progress \Box No

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.

| Societe Generale strives to take a constructive attitude when engaging in | Corporate website |
|--|--|
| dialogue with its stakeholders. The approach is described on the Group's | Dialogue with our stakeholders |
| corporate website (<i>https://www.societegenerale.com/en/</i> | |
| responsibility/dialogue-with-our-stakeholders). | <u>URD 2023</u> |
| It strives to remain attuned to its stakeholders and adapt its approach to | • Chapter 5, <u>Dialogue with stakeholders</u> , |
| better meet their expectations whenever possible, in accordance with | page 335. |
| legislation and regulations in force. More specifically, the Group practices an | |
| active listening policy with: | |
| • clients; | |
| employees (see "Being a responsible employer", page 293); | |
| investors and shareholders (see | |
| https://www.societegenerale.com/en/responsibility/dialogue-with- our- | |
| stakeholders); | |
| regulatory and supervisory bodies (see | |
| https://www.societegenerale.com/en/responsibility/dialogue-with- our- | |
| stakeholders); | |
| suppliers and service providers (see "Being a responsible purchaser: the | |
| positive sourcing programme", page 305); | |
| • the media; | |
| financial and extra-financial rating agencies (see | |
| https://www.societegenerale.com/en/responsibility/dialogue-with- our- | |
| stakeholders); | |
| civil society (see | |
| https://www.societegenerale.com/en/responsibility/dialogue-with- our- | |
| stakeholders). | |
| As regards civil society, the Group is attuned to and engages in dialogue with | |
| NGOs that alert it to E&S issues. Wherever possible, an internal enquiry is | |
| conducted and a documented response is given, either in writing or during | |

¹² Such as regulators, investors, governments, suppliers, customers and clients, academia, civil society institutions, communities, representatives of indigenous population and non-profit organizations





meetings convened for that purpose. Societe Generale uses the Sustainable Development Department to centralise communication or contact from NGOs or other stakeholders informing it about the E&S impact of its financing services or other services.

In the course of 2022, Societe Generale consulted with or participated in working groups with some ten NGOs, either in writing, through bilateral meetings or through broader, more global consultations organised by the associations themselves or by the French Banking Federation (Fédération bancaire française – FBF), Entreprises pour les Droits de l'Homme (businesses for human rights), Entreprises pour l'Environnement (businesses for the environment), Finance for Tomorrow and UNEP-FI, amongst others.





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?

 \boxtimes Yes \Box In progress \Box No

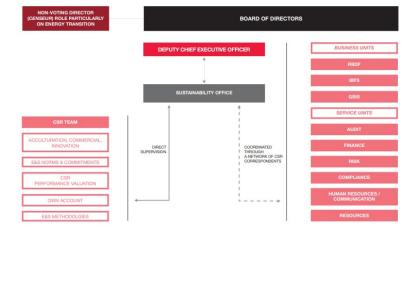
Please describe the relevant governance structures, policies and procedures your bank has in place/is planning to put in place to manage significant positive and negative (potential) impacts and support the effective implementation of the Principles. This includes information about

- 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.

Achieving the PRB commitment is inextricably linked to the implementation of the Group's CSR strategic ambition, and as such falls within the remit of General Management under the supervision of the Board of Directors

Compliance with the PRBs, as well as all the commitments made by the SG Group, is the subject of a dashboard for the attention of the Board.

The charts below present how CSR is integrated into Group governance:



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- Chapter 3, <u>Activity Report of the Board</u> of <u>Directors' Committees</u>, page 70;
- Chapter 3, <u>Remuneration of Group</u> <u>Senior Management</u>, page 112;
 Chapter 4, Application approach to
- Chapter 4, <u>Analytical approach to</u> <u>extra-financial risk factors</u> page 273;
- Chapter 5, <u>Incorporating CSR at the</u> <u>highest level of governance</u>, page 343.

Corporate website

 Performance and compensation Report 2022, page 12.





The charts below present role and responsibilities regarding CSR topics: BOARD OF DIRECTORS AND ITS COMMITTEES lates CSR strategy (notably cli and based on the re Societe Generale has developed a strict framework to manage environmental and social risks to ensure it rolls out these commitments throughout the entire organization. Four bodies play a specific role in CSR: the Board of Directors : o approves the Group's strategies and supervises their rollout, in particular with regard to CSR. Since 2020, members of the Board of Directors have received regular progress reports on the Group's CSR initiatives, as well as news of regulatory developments via a guarterly update on the topics; at least once a year, the Board of Directors review the Group's 0 strategic approaches to CSR and their rollout; formulates CSR strategy (notably climate strategy) guided by 0 General Management and the non-voting Director (one of his tasks is to assist the Board of Directors in relation to its energy transition remit since 2021, and full scope of CSR issues since 2023). The Group appointed in may 2021 to the Board of Directors a 0 non-voting Director on energy transition and and extend his remit to include the full scope of Corporate Social Responsibility topics The board of directors skills matrix indicates that ESG/CSR 0 clearly stands out as an area of expertise for each of our directors (100%). General Management, which examines CSR themes through several • committees: the Responsible Commitments Committee (CORESP), the Group Risk Committee (CORISQ), and the Business and Service Units' Strategic Management Committees; the Sustainable Development Department, which has reported to • General Management since 1 January 2022. The Head of the department is a member of the Group Management Committee and oversee the formulation of a dedicated policy for the Group that is attuned to stakeholders, and the monitoring of actions in this area. the Group BU/SU entities, which are tasked with implementing and aligning their initiatives with Societe Generale's CSR policy.





Principles for tesponsible Banking

This governance also relies on:

- Training & expertise: to ensure a smooth and systematic rollout of this E&S risk management framework across the Group, we roll out CSR training programmes for all Group staff and we aim to offer ESG training to 100% of staff by end-2024: already over 65% of staff received training at end-2022.employees.
- Roles and responsibilities: since 2020, the Group updated and integrated E&S risk management principles into the Group's new normative documentation (Societe Generale Code) as well as the main roles, responsibilities, policies to be deployed within the Group. It has been endorsed by the Board of Directors and distributed to all business and service units.
- The compliance and risk lines of defense are required to verify the proper implementation of the Code regarding E&S topics.
- a specific programme was introduced to step up operational implementation of the transformation: ESG by Design. Its main aims are to:
 - apply the Group's CSR policy at operational level;
 - develop the intergration ESG factors in existing processes (e.g. know your client, granting loans, design/structure of new products, IT architecture, etc.);
 - ensure compliance with the Group's regulatory obligations and voluntary commitments by developing the processes and tools needed to manage them, with a particular focus on integrating climate and environmental risks into the Group's risk management;
 - increase operational efficiency by expanding ESG reporting across the Board and building the infrastructure to shorten the time to produce ESG data, while minimising cost and ensuring high data quality.
- Including CSR performance criteria in setting the amount of the annual variable compensation and for the vesting of the long-term incentive of the group's CEO.
 - CSR criteria in the annual variable compensation of chief executive officers : 40% of Chief Executive Officers' annual variable compensation was based on non-financial criteria. For 2022, this 40% was divided equally between the CSR applicable to all three Chief Executive Officers and the objectives specific to each officer's remit.
 - CSR criteria in chief executive officers' long term incentive awards : Twenty percent of the vesting of long-term incentive awards depends on satisfying CSR conditions, half of which is contingent on compliance with the Group's commitments in terms of energy transition financing and half on the Group's positioning in the main extrafinancial ratings





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).

Culture & Conduct programme

Promoting ethical behaviors and a responsible banking culture : at the end of 2016, the Board of Directors approved the launch of a Group Culture & Conduct programme aimed at supporting the Group's cultural transformation, ensuring compliance with the strictest integrity standards, and establishing a lasting relationship with its stakeholders built on trust. Now that the programme has been fully implemented, all BU/SUs are expected to push further ahead with integrating Culture & Conduct considerations into the performance of their daily activities. To help achieve this, a Culture & Conduct website dedicated to BU/SUs has set up a toolbox for them containing a summary of Group best practices to enhance the teams' knowledge on culture- and conduct-related topics, as well as a list of contacts to facilitate the exchange of best practices in the Group. In 2021, each BU/SU formalised its own Culture & Conduct road map.

CSR internal portal

Moreover, the deployment of the dedicated internal CSR portal launched in November 2020 is continuing to share with all staff the E&S principles and tools, align the practices among the Group, value the ESG performance of the businesses, and educate the employees in the whole Group on sustainable issues.

Collective compensation linked to CSR non-financials results

At last, in the collective compensation of Societe Generale SA employees in France, the amount of profit-sharing and incentive schemes depends on the annual achievement of two social responsibility targets which are measured according to Societe Generale Group's ranking at the main extra-financial ratings agencies S&P Global CSA (formerly RobecoSAM), Sustainalytics and MSCI.

2022 - > Pursuing and reinforcing the E&S training offer:

The Group's CSR training offer comprises:

- around 100 training and awareness-raising modules available to all employees. These modules take a variety of forms (e-learning, masterclasses, workshops, etc.) and are all available on the Group's dedicated training platform. They are organised under six separate headings, between them covering all aspects of CSR: the basics of ESG,
 - ESG risks and assessment,
 - \circ the environmental transition and ESG,
 - o sustainable IT,
 - sustainable finance,
 - sustainable investment;
- five different training tracks for skills development: a foundational training track for all employees, specific training tracks for certain groups (ambassadors, Executive Committee members, new hires, junior staff);
- training on Climate Fresk the Group is keen to get its employees to use this tool and has set itself the target of training 30% of them on it by the end of 2024;
- specific programmes such as the CSR graduate programme and a CSR reskilling programme.

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- Chapter 2, <u>Ensuring ethical and</u> responsible conduct of business, page 51;
- Chapter 3, <u>Remuneration of Group</u> <u>Senior Management</u>, page 112;
- Chapter 4, <u>Managing ESG-related risks</u> in the Group's activities, page 274;
- Chapter 5, <u>CSR training plan</u>, page 294;
- Chapter 5, <u>Rolling out a Code of</u> <u>Conduct</u> underpinned by shared values (and human rights), page 343,
- <u>Duty of Care Plan</u>, page 359

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5.3 Policies and due diligence processes

Does your bank have policies in place that address environmental and social risks within your portfolio?¹³ 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.

Societe Generale set up a voluntary framework to manage the E&S risks stemming from its businesses, undergirded by:

- Defining the E&S standards the Group intends to apply to its banking and financing activities
- alignment targets for the most carbon-intensive sectors:
- Group normative documentation largely transposed into operating procedures
 in-house tools to identify and assess risks.

The Group's Responsible Commitments Committee (CORESP) has been created in 2019 and is chaired by the Group CEO or the Deputy Chief Executive Officer supervising the control functions. The CORESP is composed of the heads of the Compliance Department, the Risk Division, the Communications Department, the CSR Department and the heads of the relevant Business Units and Service Units (depending on the subject matter). The roles of the CORESP are as follows:

- take on new Group commitments, including CSR targets, or develop the normative framework (including sectoral E&S policies);
- review very high-risk issues related to CSR, culture and conduct, ethics or reputation;
- arbitrate complex transactions or customer cases that present a high risk in terms of the Group's reputation or non-compliance with its CSR, culture and conduct, ethics or reputation standards.

2022 -> The CORESP held six meetings over 2022 The following matters, in particular, were on the agenda at those meetings:

- changes in the Group's standards with regard to managing ESG risks, especially for the oil & gas and tobacco sectors;
- the latest commitments from the Group, such as on biodiversity* preservation and aligning its credit portfolios and internal operations with the Paris Agreement's terms;
- reviews of particularly sensitive clients and transactions from an ESG standpoint.

The Group Risk Committee (CORISQ), for its part, met 18 times over quarterly). Regular reporting to the Risk Committee is in place for all 2022. Since 2017, the CORISQ has conducted regular reviews of such matters. The Risk Committee's Activity Report for the year can be extra-financial risks such as IT systems failure (including the risk of found in Chapter 3, page 98. cybercrime) and unethical business practices (including corruption, tax evasion and money laundering). It also reviews climate-related risks (as well as the scenario and alignment indicators used to assess these risks and the proportion of the credit portfolio exposed to them) on an annual basis. As part of this annual assessment, the CORISQ looks at the main sector-based alignment and internal monitoring indicators used, the efforts undertaken to improve the assessment methodology, and the regulatory environment for the banking sector. In its capacity as the CORISQ's secretary, the Risk Division can seek advice from the Sustainable Development Department on any CSR-related environmental or reputational matters relevant to the credit portfolio. In a significant development, the CORISQ now looks at environmental

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- Chapter 4, <u>Managing ESG-</u> related risks in the Group's <u>activities</u>, page 274;
- <u>Duty of Care Plan assessment –</u> <u>Group Activities</u> (Group activities (page 365)
- <u>Duty of Care Plan</u>, page 359





factors affecting the Group's credit portfolios when assessing credit risk. Moreover, climate risks regularly appear on the agenda for its meetings with the Board throughout the year (at least The Group Risk Committee (CORISQ), for its part, met 18 times over quarterly). Regular reporting to the Risk Committee is in place for all 2022.

Self-assessment summary

Does the CEO or other C-suite officers have regular oversight over the implementation of the Principles through the bank's governance system?

⊠ Yes

🗆 No

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)?

⊠ Yes

Does your bank have measures in place to promote a culture of sustainability among employees (as described in 5.2)?

 \boxtimes Yes \Box In progress

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?

 \boxtimes Yes \Box Partially \Box 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
- ⊠ CDP
- □ IFRS Sustainability Disclosure Standards (to be published)
- ⊠ TCFD
- Other: COP Communication on progress report, EBA Pilar 3

Societe Generale discloses sustainability information through GRI, SASB, CDP,
 Chapter 5, Acting with complete transparency, page 346;
 Chapter 5, TCFD – cross reference

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table, page 353; Corporate website

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6.3 Outlook

What are the next steps your bank will undertake in next 12 month-reporting period (particularly on impact analysis¹⁴, target setting¹⁵ and governance structure for implementing the PRB)? Please describe briefly.

| | , | |
|-----|---|--|
| The | main actions planned are as follows: | <u>URD 2023</u> |
| - | stepped up application of the plan and sector policies: | Chapitre 2, <u>Extra-Financial Report</u>, page 46 |
| | developing a tool to help identify companies that do not comply with the exclusion criteria in the sector policies, | Chapter 5, <u>Duty of Care Plan</u> , page 359 |
| | continuing to hold training workshops on sector policies, | |
| | developing tools to help Business Units to qualify the E&S reputational risk posed by a company and check the criteria for application of sector policies for the Transactions scope, | |
| | continued assessments of Group clients on the deforestation issue: to meet its commitment in the Industrial agriculture and forestry sector policy to tackle deforestation, the Group will start annual monitoring of progress to ensure traceability across the value chains of clients active in the soya and cattle sectors in South America and in the palm oil industry, looking ahead to the upcoming introduction of a European regulation to stop the import of goods linked to deforestation, the Group seeks to start an additional review of clients active in the cocoa, coffee, wood and rubber sectors. The aim is to establish dialogue on what measures they intend to put in place; pursuing the process of defining and implementation of internal processes on forced labour; | |
| - | extension of alignment objectives to new sector portfolios , chosen according to how emissions-intensive they are and how material they are for the Group; | |
| - | training within the Group (with a target of 30% of employees completing Climate Fresco training by September 2024). | |

¹⁴ For example outlining plans for increasing the scope by including areas that have not yet been covered, or planned steps in terms of

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 | Customer engagement | | |
|---|-----------------------------------|--|--|
| □ Gaining or maintaining momentum in the bank | □ Stakeholder engagement | | |
| | ⊠ Data availability | | |
| □ Getting started: where to start and what to focus on in the beginning | 🖂 Data quality | | |
| □ Conducting an impact analysis | □ Access to resources | | |
| Assessing negative environmental and social impacts | □ Reporting | | |
| □ Choosing the right performance | □ Assurance | | |
| measurement methodology/ies | □ Prioritizing actions internally | | |
| ⊠ Setting targets | | | |
| □ Other: | | | |
| If desired, you can elaborate on challenges and | how you are tackling these: | | |