

# **ESG DISCLOSURE GUIDANCE**

**FINANCIAL SERVICES SECTOR** 

**Unlocking Green Finance through Disclosure of Climate-Related Financial Risks** 31/07/2025

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The ESG Disclosure Guidance for Financial Services Sector (hereinafter referred to as the 'Sectoral Guidance') was developed under the Activity 'Promoting Green Finance through Enhanced Climate-Related Financial Risk Disclosure' (the 'Activity'), as part of the UK Partnering for Accelerated Climate Transitions (UK PACT) Program. It was issued by the State Securities Commission of Vietnam to encourage the adoption of sustainable practices and the disclosure of sustainability-related information by financial institutions in Vietnam. The guidance also aims to strengthen the capacity of local organisations to improve access to sustainable finance.

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# **ACRONYMS AND ABBREVIATIONS**

	Abbreviate	English Explanation
Α	AUM	Assets Under Management
В	ВСВ	Central Bank of Brazil
С	CDP	Carbon Disclosure Project
	COP 28	28th Conference of the Parties
	CORE	Committee of Sponsoring Organizations of the Treadway Commission
	CRMF	Climate Risk Management Framework
	CSRD	Corporate Sustainability Reporting Directive
D	DEI	Diversity, Equity, and Inclusion
	DESNZ	Department for Energy Security and Net Zero
	DJSI	Dow Jones Sustainability Index
Е	EBA	European Banking Authority
	EBRD	European Bank for Reconstruction and Development
	ERM	Enterprise risk management
	ESG	Environmental, Social and Governance
	ESRS	European Sustainability Reporting Standards
	EU	European Union
G	GEB	Group Executive Board
	GFANZ	Glasgow Financial Alliance for Net Zero
	GHG	Gas greenhouse
	GRI	Global Reporting Initiative
	GSIB	Global Systemically Important Banks
Н	HKMA	Hong Kong Monetary Authority
I	IEA	International Energy Agency
	IFRS	International Financial Reporting Standards
	IPCC	Intergovernmental Panel on Climate Change
	ISS	Institutional Shareholder Services
	ISSB	International Sustainability Standards Board
	IT	Information Technology
K	KRI	Key Risk Indicators
	KRW	South Korean won
L	LGD	Loss Given Default
	LTI	Long-Term Incentive
M	MTI	Medium-Term Incentive
N	NGFS	Network for Greening the Financial System
	NYSE	New York Stock Exchange
Р	PCAF	Partnership for Carbon Accounting Financials
R	RWA	Risk-weighted asset
S	SASB	Sustainability Accounting Standards Board
	SBTi	Science Based Targets initiative Sustainable Development Goals
	SDGs SEC	Securities and Exchange Commission
	SET	ę
	SFDR	Stock Exchange of Thailand Sustainable Finance Disclosure Regulation
	SSC	State Securities Commission
Т	TCFD	Task force on Climate-related Financial Disclosures
	TNFD	Taskforce on Nature-related Financial Disclosures
	TPT	Transition Plan Taskforce
U	UK FCDO	Foreign, Commonwealth and Development Office
	UNEP FI	United Nations Environment Programme - Finance Initiative
	UNEP-WCMC	United Nations Environment Programme World Conservation Monitoring Centre
W	WEF	The World Economic Forum
	** <b>L</b> I	THE TTORIC LOCALITIES FOR THE TOTAL

# INTRODUCTION OF ESG DISCLOSURE GUIDANCE FOR FINANCIAL SERVICES SECTOR

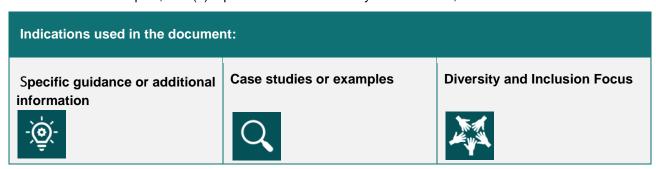
The ESG Disclosure Guidance for the Financial Services Sector was developed under the Activity 'Unlocking Green Finance through Disclosure of Climate-Related Financial Risks' (GRCF), as part of the 'UK Partnering for Accelerated Climate Transitions' (UK PACT) program by the UK Foreign, Commonwealth & Development Office (UK FCDO). The guidance aims to provide technical support to the State Securities Commission of Vietnam (SSC) in strengthening the capacity of domestic listed companies to improve access to sustainable finance. The Asia Foundation, in collaboration with EY as the technical delivery partner, was selected to implement the initiative.

The ESG Disclosure Guidance for the Financial Services Sector ("Sectoral guidance") provides instructions and reference materials to encourage and support financial institutions in Vietnam in disclosing ESG information. It ensures alignment with both domestic and international regulations, as well as with leading industry practices. The primary users of this Sectoral Guidance are public companies operating in fields classified under Section K: Financial, Banking, and Insurance Activities (Level 1 Industry) according to Decision No. 27/2018/QĐ-TTg on promulgating Vietnam standard industrial classification. In this Guidance, these entities are referred to as 'financial institutions' based on their registered business activities. Other companies within the sector are also encouraged to refer to this Guidance when developing their sustainability disclosures.

The guide consists of 3 main parts:

- Part 1: Context of ESG disclosure for financial institutions
- Part 2: Guidelines for ESG disclosure in the Financial Services Sector
- Part 3: Additional guidance on climate-related disclosure

While using the guidance, financial institutions may refer to the Handbook on ESG implementation and disclosure ('General Handbook'), which was published under the same GRCF activity. Throughout this document, symbols are used to indicate content related to: (1) specific guidance or additional information, (2) case studies or examples, and (3) topics focused on Diversity and Inclusion, as outlined below.



## Note:

For multi-sector enterprises, depending on stakeholder requirements and the company's reporting objectives and needs, ESG disclosures may need to cover some or all of the company's primary business sectors as stated in its Business Registration Certificate. For disclosures related to activities in the financial services sector, companies are encouraged to refer to the contents of this Guidance. For disclosures related to other business sectors, companies are advised to refer to the General Handbook and relevant sectoral guidance (if available).

# PART 1: ESG DISCLOSURE CONTEXT FOR FINANCIAL INSTITUTIONS

# 1. The urgency of enhancing ESG disclosure practices among financial institutions

Increasing pressure from stakeholders requires financial institutions (Fis) to understand and effectively disclose their sustainability practices. Globally, ESG regulations are becoming more stringent and clearly defined, prompting FIs to better assess the environmental impact of their business decisions—such as carbon emissions generated by a specific loan or investment. In addition, social and governance issues like financial inclusion, employee benefits and welfare, responsible lending, and business ethics are gaining prominence in stakeholder agendas. Leading FIs have recognized that ESG-related issues can significantly affect operational performance and influence their ability to attract and retain highly skilled professionals.

Investment in disclosure capacity is expected to increase in the near future. According to a report on ESG trends in the banking industry, in 2023, banks invested between \$1 million and \$5 million annually to improve their ESG disclosure capabilities. With reporting becoming mandatory in both the U.S. and internationally, it is expected that the budget for disclosure could increase to as much as \$10 million in the near future. Banks' investment priorities over the next 12 months include a number of key areas related to ESG disclosures, along with improving climate data and technology infrastructure, and mobilizing resources to prepare for final rule from the U.S. Securities and Exchange Commission (SEC) on climate-related disclosures as well as the Corporate Sustainability Reporting Directive (CSRD) and International Sustainability Standards Board (ISSB) final standards. The adoption of technology solutions will create particularly favorable conditions for ESG reporting as banks strive to disclose absolute financed emissions for priority sectors.

A 2023 report<sup>2</sup> on the current state of sustainability disclosure among financial services sector enterprises—categorized into two groups: G250 (the 250 largest global companies by revenue based on the 2021 Fortune 500 ranking) and N100 (the top 100 companies by revenue across 58 countries, territories, and jurisdictions)—revealed that financial institutions are still lagging behind other sectors in implementing sustainability reporting. However, notable progress has been made in recent years. To meet stakeholder expectations, this growth must be further accelerated so that financial institutions can achieve a 100% disclosure rate

Figure 1: Current state of sustainability disclosure of FIs in the G250 and N100 groups<sup>3</sup>

N100		G250						
% Announcement of carbon emission reduction targets								
Leading industry: Automotive manufacturing – 89%	Financial Services Sector: 61% (2017 = 38%)	Industry leader: Technology, media and telecommunications – 89%						
% Disclosure of biodiver	sity targets							
Industry Leader: Mining – 79%	Finance: 29% (2020 = 15%)	Industry Leader: Oil & Gas – 65%	Finance: 41% (2020 = 9%)					
% Announcement of the	<b>United Nations Sustaina</b>	ole Development Goals						
Leading industry: Technology, media and telecommunications – 79%								

## **DISCLOSURE OF CLIMATE-RELATED RISKS**

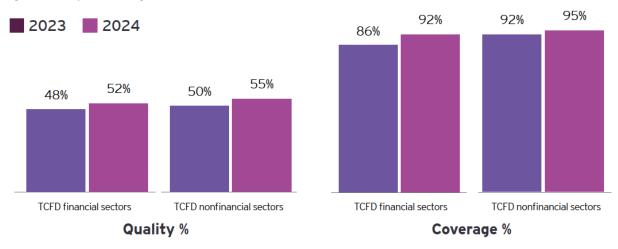
According to the World Economic Forum's (WEF) Global Risk Report<sup>4</sup>, environmental and social risks are at the heart of global risks over the next decade, with the risk of failure to mitigate and adapt to climate change being one of the top five risks, which is an urgent priority for governments, investors, businesses, and organizations in all industries and fields.

The financial services sector plays a vital role in driving efforts to mitigate and adapt to climate change. Financial institutions provide loans, investments, and insurance to various industries and sectors, financing a wide range of economic activities—from high-emission operations to those that support the energy transition and move toward a low-carbon economy. Therefore, for the entire economy to achieve the net-zero emissions target, financial institutions must assess climate-related risks in their capital allocation decisions to help guide industries and sectors toward sustainable development. According to SwissRe research, neglecting climate change will dramatically increase those risks – and could reduce the value of the global economy by about \$23 trillion per year by the middle of the century.<sup>5</sup> With a pivotal role in driving the global economy to respond to climate change, rapidly enhancing the comprehensiveness, consistency, and comparability of climate-related disclosures will become a critical requirement in the near future for financial institutions, businesses, regulators, and governments.

The recommendations and guidance of the Task Force on Climate-related Financial Disclosures (TCFD) provide a globally recognized disclosure framework, along with climate-related reporting requirements for businesses and Fls. Today, given the real-world context of global disclosure standards/frameworks, the TCFD framework—along with its referenced practices in risk assessment, technical analysis, and strategic planning such as scenario analysis—serves as the foundation for a range of policy initiatives, regulations, and market trends aimed at aligning the financial services sector with the goals of transitioning to a low-carbon economy.

Based on the results of a survey of 1,400 businesses in both the financial and non-financial services sectors, EY's Global Climate Risk Barometer 2024 provides an analysis of the level of application of the TCFD framework by businesses to prepare for the newly issued regulations on disclosure of risks and opportunities related to climate.<sup>6</sup> Accordingly, the quality and scope of implementation of the recommendations of the TCFD have increased in all sectors.

Figure 2: Quality and coverage of TCFD's recommendations – Financials and Non-Financials sector . Source: EY<sup>7</sup>



However, the data shows that banks and insurers have a lower rate of developing transition plans than other industries. Overall, 37% of banks, 36% of insurers and 17% of financial asset managers have developed transition plan at the portfolio level, compared to an interdisciplinary score of 41%.

The improvement in the climate-related disclosure by FIs is being driven by a number of factors, including:

- An increase in mandatory climate reporting regulations under the CSRD or ISSB.
- Pressure from investors on the expectation of transparent, detailed and reliable disclosure of climaterelated data.
- In addition, as corporate clients improve the quality of their disclosures, they can provide higher quality data to FIs to use for decision-making and improve disclosure.

As noted by Mark Carney, the UN Special Envoy for Climate and Finance, achieving net-zero emissions targets will require the transformation of the entire economy — along with a full consideration of climate risks in every

decision. including the allocation of capital of the financial services sector. To achieve this goal, disclosure of climate information from financial institutions will help:

- Get a clear picture of businesses' pace of change through quantitative data that tracks their decarbonization roadmap.
- Improve assessment and benchmarking among peers by making comparisons between the range of strategies used in the financial services sector to address climate-related risks and opportunities.
- Provide a comprehensive view of the current capital allocation by financial institutions to climate-sensitive sectors, and gain deeper insights into their strategies and commitments that facilitate the decarbonization process.

To achieve this, financial institutions will need to leverage their authority—as users and processors of disclosed information—to set clear expectations regarding the disclosure practices of their clients and partners. This, in turn, will enable financial institutions to gradually transform and improve their own disclosure practices..

# CHALLENGES IN DEVELOPING SUSTAINABILITY REPORTS IN THE FINANCIAL SECTOR

- As financial intermediaries in the economy, financial institutions face difficulties and limitations in assessing
  and collecting accurate, reliable information about the scope of impact of their clients across the entire
  value chain. At the same time, defining the scope of responsibility of financial institutions for environmental
  and social impacts arising from financial products, services, and providers is also highly complex:
  - Financial institutions with large and diverse customer bases make it difficult to track greenhouse gas (GHG) emissions and environmental impacts across the entire value chain. A good example is the direct and indirect impact of the financial services sector on climate change; for example, measuring and reporting on Scope 3 emissions can be extremely challenging.
  - Determining accountability in the financial services sector is much more difficult than in other industries. The complex and diverse business models of FIs make it very difficult to identify and measure environmental and social impacts.
- The existence of multiple reporting frameworks and standards and different reporting users: complicating the comparison process between businesses and markets.
- Data quality and standardization:
  - One of the major obstacles to ESG reporting is the collection and identification of reliable data.
     Financial institutions often struggle to collect relevant data to evaluate ESG performance from their investments. The lack of uniform industry standards further complicates this process, leading to difficulties in comparison and a high likelihood that organizations may selectively report only data that reflects their positive aspects<sup>8</sup>
  - Although many organizations have incorporated ESG factors into their due diligence, the
    effectiveness of these assessments largely depends on the accuracy of the data provided by
    businesses. Independent verification and review of these data, accompanied by consistent
    assessments across different legal frameworks, poses its own challenges.<sup>9</sup>
  - The reliance of financial institutions on other industries and their clients in collecting and reporting data generally leads to delays in reporting times.
  - Additionally, measuring and disclosing Scope 3 emissions, financed and facilitated emissions, as well as the carbon footprint of emission portfolios, is highly complex and faces numerous challenges—such as evolving methodologies and limited data availability.

# 2. Global sustainability disclosure context

- a) Notable changes in sustainability disclosure regulations for the financial sector in selected countries worldwide
- In 2023, the ISSB issued IFRS S1 (General Requirements for Disclosure of Financial Information Related
  to Sustainable Development) and IFRS S2 (Disclosure of Climate-Related Information). IFRS S2 requires
  entities involved in certain financial activities (including commercial banks) to disclose the emissions they
  finance<sup>10</sup>. As of December 2023, nearly 400 institutions from 64 jurisdictions have committed to promoting
  the use of the ISSB under the COP28 Declaration of Support, including the State Securities Commission
  of Vietnam<sup>11</sup>. Examples include:

- In October 2023, the UK's Department for Energy Security and Net Zero (DESNZ) launched a
  consultation on Scope 3 greenhouse gas emissions reporting for businesses to provide input to
  the government's decision on whether to endorse ISSB standards in the UK.<sup>12</sup>
- In the same month, the Philippine Securities and Exchange Commission said it was revising its sustainability reporting guidelines for listed companies, which are considering IFRS S1 and IFRS S2.<sup>13</sup>

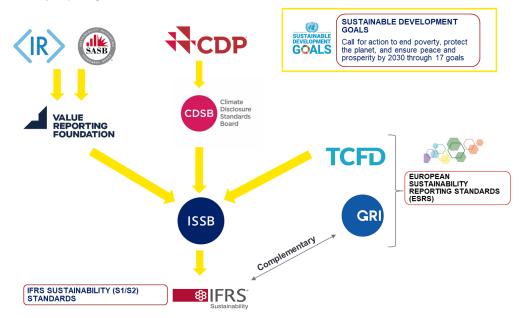
## In the EU:

- The EU has introduced a transparent reporting framework, the Sustainable Finance Disclosure Regulation (SFDR). By providing a way for financial market participants to disclose sustainability information, the reporting framework helps investors looking for companies and projects that support sustainability goals to make informed choices. The SFDR is also designed to allow investors to properly assess the sustainability risks that are integrated into the investment decision-making process. In this way, the SFDR contributes to one of the EU's major political goals: attracting private investment to help EU transition to a net-zero emissions economy.<sup>14</sup>
- In October 2023, the European Banking Authority (EBA) recommended improvements to Pillar 1 of the EU prudential framework, based on the Basel Framework<sup>15</sup>, to promote the integration of environmental and social risks, and may consider additional amendments to the scenario analysis and the role of transition plans<sup>16</sup>.
- In the United Kingdom: At COP26, the UK government announced the establishment of the UK Transition Plan Taskforce (TPT)<sup>17</sup> to develop a 'gold standard' for the private sector's climate transition plan disclosure framework. Launched in November 2022 and completed in October 2023, TPT published TPT's Disclosure Framework and Implementation Guidelines.
- **In Hong Kong:** In August 2023, the Hong Kong Monetary Authority (HKMA) issued guidelines and circulars to set out overarching principles for Authorised Institutions in planning the transition towards net zero emissions. <sup>18</sup> This includes local banks and branches or subsidiaries in Hong Kong.
- The People's Bank of China has also taken the initiative to make climate-related risk disclosure mandatory, starting with a group of financial institutions and expanding to larger markets in the future. 19
  - In February 2024, under the auspices of the China Securities Regulatory Commission (CSRC), three stock exchanges required SSE 180, STAR 50, SZSE 100 and ChiNext enterprises, as well as domestic and foreign SOEs, to make ESG disclosures by 2026.
  - In December 2024, the Ministry of Finance finalized the Basic Guidelines on Corporate Sustainability Disclosure under the ISSB.
- In Malaysia: From 2025, according to the implementation phases of the National Sustainability Reporting Framework, listed companies must publish ESG reports that comply with IFRS S1 and S2 and from 2027, publish on Scope 3 emissions.
- **In Singapore:** From 2023, the Singapore Exchange will introduce mandatory climate disclosure requirements for financial institutions.

# b) Several changes in ESG frameworks and standards for the Financial Services Sector

IFRS has affirmed the urgency of establishing a global sustainability reporting framework to form a comparable, consistent and reliable reporting system. Accordingly, the International Sustainability Standards Board (ISSB) - IFRS is currently working to provide a common global basis for the disclosure of sustainable development information. Since 2024, IFRS has taken over the responsibilities of the TCFD in overseeing climate-related reporting. When selecting ESG frameworks and standards for developing and disclosing ESG reports, financial institutions need to consider the purpose of the report, its intended users, and the regulations in the countries where they operate, in order to choose one or more appropriate standards.

Figure 3: Sustainablity Reporting Standards



At the same time, efforts are being made globally to develop specific guidelines for the financial sector and its sub-sectors, with several adjustments and changes as outlined below .

Table 1: The development of specific guidelines for the financial services sector and sub-sectors

Sustainability reporting Framework and Standards	Recent updates
GRI	<ul> <li>The GRI is developing specific standards for the Banking, Capital Markets and Insurance subsectors, which are expected to be released in Q2 2026.<sup>21</sup></li> </ul>
<b>Sustainability</b>	• The International Sustainability Standards Board (ISSB) has released Industry-Based Guidance on the Implementation of Climate-Related Disclosures, along with IFRS S2 standards, to propose indicators that businesses can use to identify, measure, and disclose information about climate-related risks and opportunities. In addition, more and more economies and financial systems recognize biodiversity as a systemic risk. In April 2023, the International Standards for Sustainable Development (ISSB) announced a plan to consult additional standards related to biodiversity, ecosystems, and ecosystem services in accordance with the recommendations of the Task Force on Nature-Related Financial Disclosures (TNFD) <sup>23</sup> published in September 2023. The Natural Risks and Biodiversity Dataset, developed by S&P Global Sustainable in partnership with UNEP-WCMC, has been introduced to support reporting in line with TNFD's recommendations. If the new TNFD recommendations are also applied as the TCFD, TNFD may become a mandatory element of reporting and disclosure.
	<ul> <li>In April 2024, in its 2024-2026 plan, ISSB announced that it will start implementing research projects on risks and opportunities related to biodiversity, ecosystems and ecosystem services to assess investors' information needs for these risks and opportunities to assess the development potential of businesses. This could be a sign for the ISSB to develop the next IFRS S3 guidance standard on Biodiversity, Ecosystems and Ecosystem Services.</li> </ul>
	<ul> <li>The recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) have been integrated into the ISSB's IFRS standards,</li> </ul>

Sustainability reporting Framework and Standards	Recent updates
	in response to the growing demand from investors and financial markets for useful, comparable, and reliable sustainability information. <sup>24,25</sup>
	<ul> <li>The TPT's Disclosure Framework provides recommendations for businesses and financial institutions to come up with credible and comprehensive transition plans by focusing on five key elements: foundation, implementation strategy, engagement strategy, metrics &amp; targets, and governance.</li> </ul>
TPT Transition Plan Taskforce	<ul> <li>In 2024, to supplement its Disclosure Framework, TPT has also issued industry-specific guidance. For the Finance industry, TPT has introduced relevant guidance for Asset Management, Asset Owners, and Banking.</li> <li>Since June 2024, IFRS has been responsible for managing the specific disclosure documents developed by the TPT, ensuring these standards are integrated into global financial reporting activities.</li> </ul>
* * * * * * * * * * * * * * * * * * *	• ESRS E1-1 (Transition plan for climate change mitigation) of ESRS E1 (on climate change) <sup>26</sup> requires organizations, including financial institutions, to disclose their transition plans to mitigate climate change and the purposes of the disclosure.
PCAF Partnership for Carbon Accounting Financials	<ul> <li>Partnership for Carbon Accounting Financials (PCAF) has introduced methods for measuring and publishing financed and insurance-related emissions for financial institutions, in line with the GHG Protocol. Among the financial institutions that reported financed emissions to CDP in 2022, 79% (173 out of 219) referenced PCAF or the Global GHG Accounting and Reporting Standard for the Financial Industry.<sup>27</sup></li> </ul>
SCIENCE BASED TARGETS DRIVING AMBITIOUS CORPORATE CLIMATE ACTION	<ul> <li>Financial Institutions Net-Zero Standard – Version 1.0 announced in July 2025</li> <li>Financial Institutions Near-Term Criteria – Version 2.0 has been published in 2024. More than 165 financial institutions have their targets confirmed according to this set of criteria.<sup>28</sup></li> </ul>
<b>O</b> GFANZ	<ul> <li>In 2022, the Glasgow Financial Alliance for Net Zero (GFANZ) developed comprehensive guidance for financial institutions to design and implement net-zero transition plans. These plans align institutional activities with global climate goals and serve as a foundation for disclosing financial institutions' transition strategies.</li> </ul>

# 3. Sustainability disclosure context in Vietnam

Vietnam's National Action Plan for the Implementation of the 2030 Agenda for Sustainable Development identifies sustainable development as a "cross-cutting requirement in the country's development process", requiring the mobilization of financial resources, especially from the private sector, to achieve the sustainable development goals.<sup>29</sup> This commitment is important for the financial services sector as it allocates and mobilizes financial resources in all aspects of the economy. In addition, the Prime Minister's Decision No. 1658/QD-TTg in 2021 on the National Green Growth Strategy for the 2021-2030 period, with a vision to 2050<sup>30</sup> and Decision No. 1726/2023/QD-TTg on approval of the Strategy for the Development of the Securities Market to 2030 also emphasizes the key role of green credit activities. green banks, green financial instruments, sustainable finance (such as green bonds, sustainable bonds), in the successful implementation of this strategy.

Consistent with the national direction on sustainable development, in order to improve the responsibility and transparency in the implementation and sustainable practices of enterprises, Circular No. 96/2020/TT-BTC

providing guidelines on disclosure of information on securities market has set out a number of requirements for sustainability disclosure in the Annual Report for public companies, including:

Table 2: Request for information disclosure according to Circular 96/2020/TT-BTC

STT	Topic	Disclosure Requirements						
	General Information							
	Development direction	<ul> <li>Sustainability goals (environmental, social and community) and key programs related to the Company's short- and medium-term</li> </ul>						
	Corporate Environmental a							
1.	Impact on the environment	<ul><li>Total direct and indirect GHG emission</li><li>Measures and initiatives to reduce GHG emission</li></ul>						
2.	Management of raw materials	<ul> <li>The total amount of raw materials used for the manufacture and packaging of the products as well as services of the organization during the year</li> <li>The percentage of materials recycled to produce products and services of the organization</li> </ul>						
3.	Energy Consumption	<ul> <li>Direct and indirect energy consumption</li> <li>Energy savings through energy efficiency initiatives</li> <li>Energy efficiency initiative reports (providing energy-efficient or renewable energy products and services); Report on the results of these initiatives</li> </ul>						
4.	Water consumption	<ul><li>Water sources and water usage</li><li>Percentage and total amount of recycled and reused water</li></ul>						
5.	Compliance with the law on environmental protection	<ul> <li>Number of times the company is fined for failing to comply with laws and regulations on environment</li> <li>The total amount to be fined for failing to comply with laws and regulations on the environment</li> </ul>						
6.	Policies related to employees	<ul> <li>Number of employees, average salary for employees</li> <li>Labor policy to ensure the health, safety and welfare of employees</li> <li>Employee training activities:         <ul> <li>Average number of training hours per year, by employee and by employee classification</li> <li>Continuing learning and skills development programs to support workers in securing employment and career development</li> </ul> </li> </ul>						
7.	Reporting related to responsibility to local communities	Community investment and other community development activities, including financial support to serve the community						
8.	Report on green capital market activities under the guidance of the SSC							

Regarding the environmental and social impact report, public company can choose to include it in the annual report or develop a separate sustainability report, in which the topics - (1) environmental impact, (2) management of raw materials and (3) energy consumption in the above table are not mandatory for organisations operating in the fields of financial services, banking, securities and insurance. At the same time, the Circular also encourages businesses to apply international reporting standards in developing sustainability reports.

FIs that are not subject to compulsory application under Circular No. 96/2020/TT-BTC are also encouraged to disclose information related to sustainable development, in accordance with the provisions of Circular No. 96/2020/TT-BTC or relevant international reporting standards.

# Current state of sustainability disclosure of FIs in Vietnam

In addition to complying with the requirements of Circular No. 96/2020/TT-BTC on disclosure of sustainability-related information for public companies, to increase transparency of business activities, enterprises in Vietnam, including financial institutions, are increasingly receiving stricter requirements on ESG information disclosure from stakeholders. However, as mentioned above, in order to meet these requirements, as financial

intermediaries in the economy, FIs in Vietnam face major obstacles in collecting reliable data, and at the same time depend on other industries in collecting and reporting ESG data.

This challenge stems from the fact that awareness and practice of ESG reporting among businesses in Vietnam are still in the early stages of development and require support and encouragement for improvement. According to a survey conducted by the Agency for Private Enterprise Development and Collective Economy (APED), under the Ministry of Planning and Investment (now the Ministry of Finance), between May and July 2024, as part of a report on sustainable business practices, <sup>31</sup> ESG remains a relatively new concept—especially for small, medium, and micro-sized enterprises. Of the 1,019 enterprises participating in the survey, 55% of enterprises have never heard of the concept of "ESG" (although they may have practiced on environmental, social, and governance topics), at the same time, only 5% of enterprises have a plan and are actively implementing ESG in a structured approach. In terms of reporting practices, across the country, up to 42% of businesses do not have financial reports or assessments related to environmental and social responsibility. Among them, 19% of businesses fail to produce such reports despite being part of the group required to do so.

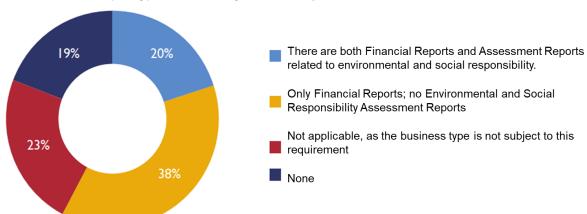
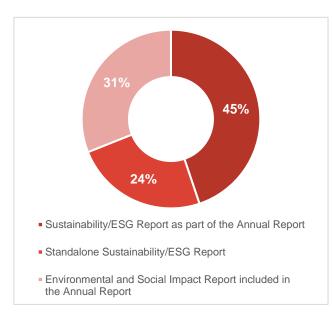


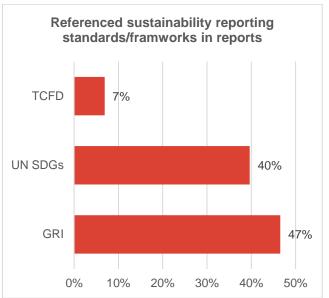
Figure 4: Classification of reporting practices according to APED survey results<sup>32</sup>

According to APED's survey report, in terms of overall ESG practice classification, businesses in the real estate and financial sectors demonstrated the strongest ESG performance. These sectors had the highest proportion of companies rated A (with scores above 80%)—26%—indicating they are pioneers in ESG implementation. Additionally, 71% of businesses in these sectors were rated B (scores between 50–80%), showing strong potential for ESG practices if sector-specific challenges are addressed. The remaining 3% were rated C (scores below 50%), as most had not implemented or had very few ESG-related activities or solutions. At the same time, among businesses in the real estate and finance sectors, about 40% of businesses are facing difficulties in disclosing ESG practices.

In addition, according to 2025 statistics from the UK PACT project team covering 58 financial institutions listed on HOSE and HNX, 69% of these institutions have developed sustainability/ESG reports, and 24% have published standalone sustainability/ESG reports. GRI is the most commonly referenced ESG reporting standard among financial institutions, with a usage rate of 47%. Notably, 7% of these institutions have adopted the TCFD standard for climate-related disclosures.

# Sustainability/ESG reporting practices of financial institutions listed on HOSE and HNX





# PART 2: GUIDELINES FOR ESG DISCLOSURE IN THE FINANCIAL SERVICES SECTOR

The Handbook on ESG Implementation and Disclosure ('General Handbook') has provided guidelines for developing sustainability-related disclosure according to 8 elements as follows.

Figure 5: Sustainability Report Structure



Financial institutions should refer to the guidance provided for each disclosure element in the General Handbook, and combine it with the additional instructions outlined in this sector-specific guide for elements that are unique to the financial sector, including:

- Materiality assessment
- Governance
- Strategy
- Risk Management
- Metrics and targets

The instruction in each element will include:

- Element disclosure requirements as outlined in the General Handbook
- · Additional specific guidelines for financial institutions on disclosure requirements
- An illustrative example of disclosure

# Note:

- Sustainability-related disclosure in accordance with the contents of the General Handbook and sectoral
  guidance ensures compliance with legal requirements on sustainability reporting. Enterprises may refer to
  the comparison of disclosure requirements between regulations and the recommendations provided in the
  General Handbook/sectoral guidance outlined in Part 3, Section 3 of the General Handbook, for each
  disclosure element.
- Depending on disclosure approach, financial institution may choose between developing a standalone sustainability report or integrating it into the annual report/governance report, aligning with the specific requirements of the financial institution and its stakeholders and ensuring the completeness and linkage of the published contents. Accordingly, FIs should pay attention to ensuring the following principles – which have been explained in detail in the General Handbook – Part 3, Section 2.

# **Guiding Principles for sustainability reporting**

Principles for defining report content	Principles for defining report quality				
Strategic and long-term focus	Accuracy and precision				
Connectivity of information	Balance				
Stakeholder inclusiveness	Clarity				
Materiality and relevance	Comparability				
• Completeness	Reliability				
	Timeliness				

# 1. Materiality assessment

# **GENERAL REQUIREMENTS FOR ESG DISCLOSURE**

Elements	Content
Materiality assessment	<ul> <li>A list of material sustainability-related matters.</li> <li>A descriptive process of coming up with this list (identifying, prioritising and shortlisting matters), including stakeholders' engagement i.e., who is held responsible, accountable, consulted, or informed on the process.</li> <li>A description of processes in place to manage these matters, including: <ul> <li>describe the actual and potential, negative and positive impacts on the economy, environment, and people, including impacts on their human rights through its activities or as a result of its business relationship. Report whether the organization is involved with the negative impacts</li> <li>describe its policies or commitments regarding the material topic;</li> <li>describe actions taken to manage the topic and related impacts and track the effectiveness of the actions taken, goals, targets, and indicators used to evaluate progress, lessons learned, including:</li> <li>i. actions to prevent or mitigate potential negative impacts;</li> <li>ii. actions to address actual negative impacts;</li> <li>iii. actions to manage actual and potential positive impacts;</li> </ul> </li> <li>describe whether and how affected stakeholders have been involved in determining an appropriate remedy for a negative impact or how stakeholder feedback is used to assess the effectiveness of the actions taken.</li> </ul>

# GUIDANCE ON DEVELOPING DISCLOSURE CONTENT ON MATERIALITY ASSESSMENT FOR FINANCIAL INSTITUTIONS

The methodology for developing a list of material sustainability-related topics has been described in detail in the General Handbook, section 2 – section 2.1.2 ESG Materiality Assessment. For financial institutions, some additional considerations in the steps for material topic list development include:

# Step 1: Establish purpose and scope of materiality determination process:

Financial institutions vary greatly in size and scope—from global conglomerates among the largest in the
world, with workforces in the thousands and assets worth billions of dollars, to local community banks and
credit institutions with small to medium-sized teams serving specific communities. The organizational
structure and applicable regulations also differ depending on the types of services they provide. To identify
key sustainability issues relevant to their specific context, institutions should first establish an initial
overview of their business activities, including:

- Included entities, business activities, business relationships, and sustainability contexts;
- The entire value chain activities to identify key sustainability issues at each stage of the product & service life cycle, including an assessment of key inputs, outputs, activities and business relationships, and environmental and social impacts at each stage.
- **Identify and engage with stakeholders:** Financial institutions need to proactively communicate with key stakeholders to understand their key concerns necessary for identifying material issues. The safety and resilience of the Financial services sector depends on the joint efforts of many stakeholders, including industry organizations, economic sector groups, national government agencies, financial regulators, and private sector partners both domestically and internationally.

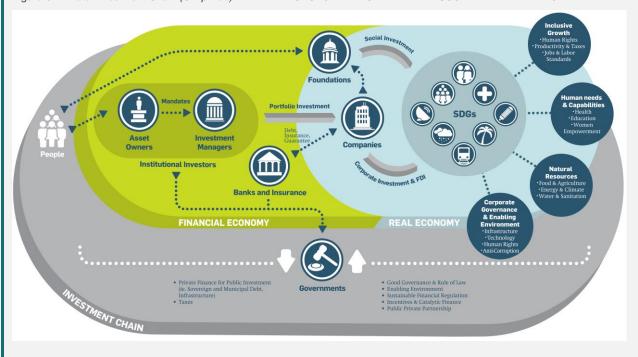


# Overview of the financial system

Given the wide scope of the Financial Services Sector, to provide context for the analysis of the materiality of the industry, the following provides a simple illustration of the financial system, according to the UN Global Compact,<sup>33</sup> showing the relationship between the financial system and the economy, the main sources of capital, the main participants and the flow of financial resources. The decision-making process of financial institutions is shaped by policies, rules, regulations, structures, and preferential regimes.

Institutional investors, businesses and funds own significant private investment capital and, therefore, are important participants in the design and implementation of investment strategies for the sustainable development agenda. At the same time, the growth prospects of the private sector also depend on the existence of a prosperous and sustainable society. As businesses, markets, and economies become more connected and globalized, businesses and investors will become more aware of the intersection of interests between the public and private sectors.

Figure 6: Private Investment Chain (Simplified) - PRIVATE SECTOR INVESTMENT AND SUSTAINABLE DEVELOPMENT<sup>34</sup>



# Step 2: Identify potential topics

To identify potential topics, financial institutions need to consider the context of regulations and key trends in sustainability in the industry, assess environmental, social and governance impacts, along with reference to international standard frameworks for sustainable development and standard frameworks on key industry topics including (non-exhaustive):

- GR
- United Nations Sustainable Development Goals (SDGs).
- SASB Standard guidance on disclosure topics as required by IFRS S1.
- ESG Ratings and Indices

The table below provides a list of material topics compiled according to the SASB Standards and a number of global ESG rankings including MSCI, S&P, Sustainalytics for local FIs' reference. The activities of financial institutions are categorized into groups according to the SASB Standards to assess material topics, as outlined below<sup>35</sup>. Financial institutions can look up which sub-group their organization belongs to at: https://sasb.ifrs.org/find-your-industry/.

- 1. Commercial banks: Organizations that carry out activities of receiving deposits and lending (for individuals or businesses). These organizations are also involved in lending to projects on infrastructure, real estate, and other projects.
- 2. Consumer Finance: Organizations that provide loans to consumers. Products include credit cards, car loans, and student loans. Other services may include consumer-to-consumer money transfer services, money orders, prepaid debit cards, and bill payment services.
- 3. **Mortgage finance**: Institutions lend to customers through the use of collateral. Products and services include residential and commercial mortgages, mortgage servicing, title insurance, closing and settlement services and valuation.
- 4. Investment Banking & Brokerage: Institutions perform a wide range of functions in the capital markets, including raising and allocating capital and providing market-making and advisory services for corporations, financial institutions, governments and high net-worth individuals. Specific activities include financial advisory and securities underwriting services conducted on a fee basis; securities and commodities brokerage activities; trading and principal investment activities. Investment banks also initiate and securitize loans for infrastructure and other projects.
- 5. Asset management and custody activities: Institutions manage portfolios on a commission or fee basis for institutional, retail, and high-net-worth investors. In addition, organizations in this industry provide wealth management services, private banking services, financial planning, investment advisory and retail securities brokerage services.
- 6. Insurance: Organizations that offer both traditional and non-traditional insurance-related products. Traditional policy lines include property, life, casualty, and reinsurance. Non-traditional products include annuities, alternative risk transfer, and financial guarantees. Organizations in the insurance industry are also involved in proprietary investment.

Financial institutions should carefully consider the relevance and materiality of the topics proposed in the guidance, depending on their business context. In addition, organizations should also analyze other sustainability topics (not included in the list below) to comprehensively identify material issues.

Table 3: Material topics proposed for Fls in Vietnam

	Material topics proposed for FIs in Vietnam			Material topics mapping for each activities					ies	
	To	opic group	Торіс		Commercial Banking	Consumer Finance	Mortgage finance	Investment Banking & Brokerage	Asset Management & Custody Activities	Insurance
1			Customer Privacy	′		х				х
2	ors		Data Security		Х	Х	Х	х	Х	Х
3	ial factors	Customers and end consumers	Accessibility and price relevance		х	х	х			х
4	Social		Product Sales and Labeling Practices	Transparent Information & Fair Advice for Clients					х	х

	Material topics proposed for FIs in Vietnam					Material topics mapping for each activities				
	Topic group		Topic		Commercial Banking	Consumer Finance	Mortgage finance	Investment Banking & Brokerage	Asset Management & Custody Activities	Insurance
				Sales Practice		х				'
				Lending practices			х			
				Discrimination in lending			х			
5		Human Resources/ Workforce	Improving human	Improving human resources		x	х	x	x	x
				Financing Emissions	Х			х	х	х
			Product Design	ESG Integration	х			х	x	х
1		Business model and innovation	& Lifecycle Management	Policies designed to encourage responsible behaviour						х
2	Governance Factor		The Physical Impact of Climate Change				х			x
3	nanc	Leadership	Business Ethics		Х			Х	х	
4	Goveri	and Governance	System Risk Management		х			х		х

Example 1: ESG Disclosure - Materiality Assessment



# Materiality assessment process of a large bank in Thailand<sup>36</sup>

The process for evaluating and identifying material topics is as follows:

Bank conducts an annual qualitative assessment of material sustainability topics to analyze the environmental, social, economic, and human rights impacts arising from its operations and business relationships.

Every two years, Bank undertakes a formal materiality assessment through stakeholder interviews regarding sustainability operations to gather insights for identifying material topics and developing the sustainability strategy. Bank reviews the previous year's findings while analyzing alignment with current internal and external organizational contexts.

# 1. Identification

- Studies were conducted on related aspects set out in national and international sustainability standards and trends, e.g., GRI Standards, Sustainability Accounting Standard Board (SASB), Stock Exchange of Thailand (SET), and environmental and banking specialists.
- The material aspects deemed important by leading domestic and global banks were reviewed and assessed.
- The material aspects were studied and assessed against SDGs Impact by Financial Sector.
- Recommendations were sought from the stakeholders on the screened material topics.

# 2. Prioritization:

 Surveys on opinions of stakeholders including shareholders, Board of Directors, regulatory agencies, customers, suppliers, residents in communities and employees were conducted through questionnaires and in-depth interviews to gain a comprehensive understanding of their feedback, expectations and key concerns surrounding Bank's sustainability endeavors.

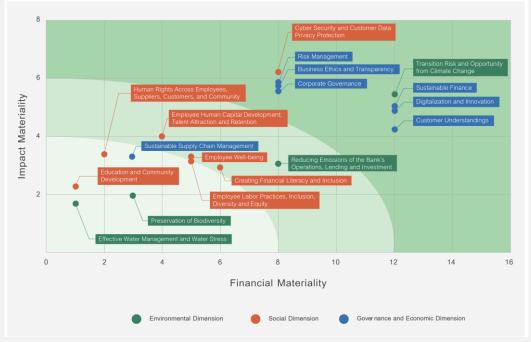
- Information gained from internal and external stakeholders was analyzed and reviewed based on stakeholder prioritization, combining the impact materiality and financial materiality, and finalizing the double materiality assessment.
- The impact materiality on stakeholders and the financial materiality on Bank's corporate value were determined by assessing the magnitude and likelihood of impacts, with the levels determined based on Bank's enterprise risk management criteria.

# 3. Validation

- The material aspects were reported to the Corporate Governance Committee to be endorsed for further submission to the Board of Directors for approval and disclosure in Bank's Sustainability Report and website.
- The derived prioritization was explained to all divisions so that they acknowledged the stakeholders' opinions and used them to define the operational guidelines of Bank.

## 4. Review

Views and recommendations from stakeholders across multiple channels will be used to for development of Bank's operations and information disclosure within subsequent reports.



The list of key topics includes:

# High Materiality Level

- Cyber Security and Customer Data Privacy Protection
- Risk Management
- Sustainable Finance\*
- Transition Risks and Opportunity from Climate Change\*\*
- Customer Understandings Business Ethics and Transparency
- Corporate Governance
   Digitalization and Innovation

# Moderate Materiality Level

- Employee Labor Practices, Inclusion, Diversity, and Equity
- Employee Human Capital Development, Talent Attraction and Retention
- · Employee Well-Being
- Reducing Emissions of the Bank's Operations, Lending, and Investment \*\*\*
- Creating Financial Literacy and Inclusion

# Low Materiality Level

- Sustainable Supply Chain Management
- · Preservation of Biodiversity
- Effective Water Management and Water Stress
- Human Rights Across Employees, Suppliers, Customers and Community
- Education and Community Development\*\*\*\*

#### Notes

- \* This topic includes Environmentally Responsible Financial Products and Socially Responsible Financial Products
- \*\* This topic includes Clean Energy
- \*\*\* This topic includes Reducing Pollution, Creating Environmental Awareness, Effective Waste Management, and Collaboration with Institutions Focusing on Sustainable Development
- \*\*\*\* This topic includes Social and Cultural Preservation and Development

For each material topic identified, the Bank has published information on the current process in managing that topic in the following contents of the Sustainability Report:

# 042 Environmental Dimension

044 Task Force on Climate-related Financial Disclosures (TCFD)

078 Environmental Management

# 084 Social Dimension

086 Financial Inclusion and Financial Literacy

096 Cyber Security and Data Privacy

104 Human Resource Management

119 Human Rights Operations

124 Social Contributions

# 140 Governance and Economic Dimension

142 Corporate Governance

145 Business Ethics

150 Risk Management

155 Financial Innovations and Services

170 Responsible Lending and Investment:

ESG Credit and Investment

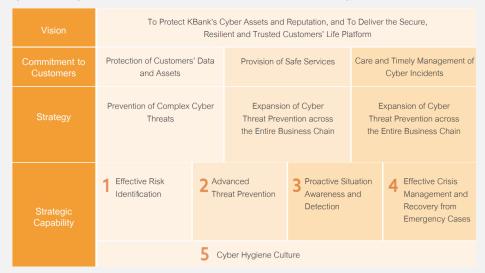
182 Sustainable Supply Chain Management

Specifically, on the topic of "Cyber Security and Data Privacy", the Bank has announced the following information: **Information Technology and Data Security Structure** 

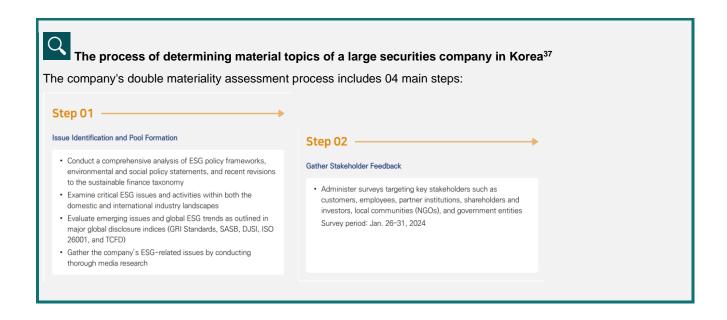
- Bank's organizational structure aims to effectively supervise IT and data security management. Focus is on a segregation of risk prevention duties in accordance with the Three Lines of Defence guideline.
- The Board of Directors approves the policy for risk appetite and risk limit. It has assigned various working groups to perform their tasks related to information technology and data security. The Board of Directors has approved relevant strategies and polices to maintain and promote data security, namely Information Technology and Security Policy, IT and Third Party Risk Management Policy, accounting for data security of customers, employees and all other stakeholders, the Bank's system security and the evolving behavior of financial service users. The Bank has developed a roadmap for a cybersecurity risk control systemto achieve the set goals. The plan focuses on three main pillars: prevention, detection and response, covering the entire business process and critical systems of the bank. The Bank strictly complies with the Personal Data Protection Law B.E. 2562 (2019).

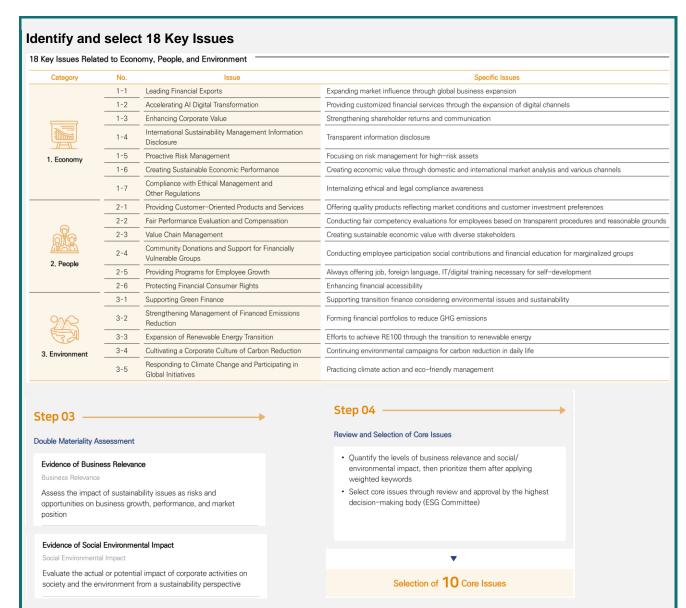
# Digital and Cyber Risk Management Framework

 Bank has formulated a digital and cyber risk management framework in alignment with the strategy of maintaining our leadership in digital banking services. The Bank Cyber Risk Vision and Strategy is as follows:



At the same time, the Bank also announced details of work related to transformation, upgrading and renewing technology systems, training to improve human resource capacity, implementing appropriate security measures and reporting on data leakage incidents, methods and handling results. Other key risks are also considered, assessed and have response solutions including artificial intelligence risks, Financial Fraud Prevention. The Bank also reported on cooperation activities with regulators and related industries and proactive activities on building a culture of cyber risk awareness.





The organisation also disclose information for each material topic. For the topic "Expansion of Renewable Energy Transition":

# **RE100 Progress**

- As a pioneer in the field of finance in the country, participating in RE100 and building a roadmap to fully transition to renewable energy.
- The company has signed multiple renewable energy power purchase agreements to achieve its transition goals despite supply and demand challenges.
- After the Power Purchase Agreement (PPA) law was amended, the Company became the first company in the financial services sector to sign long-term Renewable Energy Certificate (REC) purchase and sale agreements and Virtual Power Purchase Agreements (VPPAs) with Jinyang, Peta Power and PV Energy in 2023.
- As of April 2024, based on cumulative contract data, we have achieved 48.2% of our target. Details of PPAs were included as follows:

Category	Contribution to Renewable Energy Transition (%)	Generation Capacity (MWh/year)
Jinyang	2.5	1,313
Peta power	5.0	2,625
PV Energy	40.7	29,261
Total	48.2	33,199

# **Establishing a Virtuous Cycle Structure**

- Leverage the capabilities of its Investment Bank to create a sustainable cycle through which the transition to renewable energy through financing agreements will be profitable.
- As the supply of renewable energy becomes stable, the organisation will seek additional market opportunities to diversify renewable energy sources and contribute to this transition at the national level through financial agreements.
- Based on the scenario analysis conducted this year, the organisation plans to accelerate the renewable energy transition, collaborating with other financial institutions and relevant government agencies to be ready to respond to possible price increases and regulatory costs in the fossil fuel energy market.
- Support for projects that adhere to the green taxonomy.

# 2. Governance

# GENERAL REQUIREMENTS FOR ESG DISCLOSURE

Elements	Content
Board Oversight	<ul> <li>Governance roles and responsibilities, structure, and composition for sustainability-related matters, including: composition and diversity, roles and responsibilities, quality and expertise of governance body or access to experts or training; sustainability-specific structures/committees in place (if any)</li> <li>Board or Board committees' oversight of sustainability-related matters, including process, frequency, and oversight mechanism of target setting and progress monitoring related to sustainability-related matter</li> <li>Other (if not mentioned above): Business ethics, conflict of interest, competitive behavior</li> </ul>
Management's role in the governance processes, controls and procedures used to monitor, manage and oversee sustainability-related matters	<ul> <li>Delegation of roles and authorities to a specific management-level position or management-level committee</li> <li>How oversight is exercised over that position or committee including reporting lines and any control and procedures applied for oversight of sustainability-related matters, and how these engage with other internal functions</li> </ul>
Integration of sustainability-related performance in incentive schemes	<ul> <li>Description of sustainability-related remuneration policies and incentive schemes, and proportion of remuneration linked to sustainability targets.</li> </ul>

# GUIDANCE ON DEVELOPING DISCLOSURE CONTENT ON GOVERNANCE FOR FINANCIAL INSTITUTIONS

Governance disclosure aims to provide an understanding of the governance processes, controls and procedures the organisation uses to monitor, manage and oversee sustainability matters in the form of a board-approved charter and governing policies, the roles, responsibilities, decision-making mechanisms and Integration of sustainability-related performance in incentive schemes.

Corporate Leadership is responsible for taking the lead in establishing ESG values and relevance to the business, and accordingly, incorporating them into the vision, mission and goals of the business. This serves as an important foundation for organisations to establish and ensure the fulfillment of their sustainability commitments to key stakeholders and the communities in which they operate.

Financial institutions can refer to the General Handbook - Part 2, section 2.1.1 and Part 3, section 3.4.



# Capacity of the Board of Directors of the world's largest financial group, headquartered in Switzerland<sup>38</sup>

The Board of Directors (BoD) is comprised of members with a diverse range of skills, educational backgrounds, experience and expertise from a wide range of sectors, reflecting the nature and scope of the bank's business. To meet recruitment needs, the Nomination and Management Committee uses the skills and experience matrix as a tool to identify gaps in competencies considered most important to the BoD, including factors such as business access, risk profile, strategy, and geographic scope of management.

### Key competencies:

- Banking (asset management, personal and corporate asset management; insurance)
- Investment banking, capital markets
- Finance, auditing, accounting
- Risk Management
- Personnel management, including compensation
- Legal, compliant
- Technology, cyber security
- Regulators, central banks
- Environmental, Social and Governance (ESG)

Senior Leadership Experience

- Experience in the role of chief executive officer (CEO) or president.
- Board leadership experience (e.g., chief financial officer – CFO, chief risk officer – CRO, or chief executive officer – COO at a listed company).

The Group's Board of Directors (BoD) as of December 31, 2024 consists of 12 non-executive members. Meanwhile, the Group Executive Board (GEB) consists of 15 executive members. Compared to 2023, the number of non-executive members of the BoD has remained unchanged, while the Executive Board has decreased from 16 to 15 members.

In terms of gender ratio, 26.7% (2023: 37.5%) of members of the Group and 41.7% (2023: 33.3%) of members of the BoD were women, while for Group AG women made up 21.4% of members of the Executive Board and 41.7% of members of the BoD. To ensure diversity and alignment with governance requirements, the Governance and Nominating Committee used a skills and experience matrix to identify gaps in the BoD's capacity, thereby ensuring that members have the necessary skills and experience to carry out their duties.

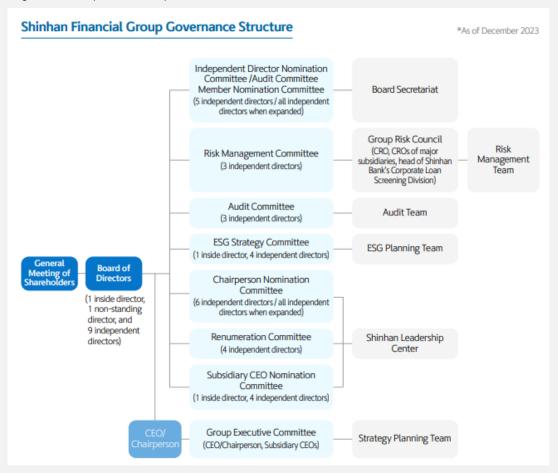
Example 3: ESG Disclosure - Governance Structure



# Oversight of the Board of Directors for Sustainable Development at a Major Financial Group in Korea<sup>40</sup>

Financial Group strives to ensure transparency, soundness and stability of its governance to promote the Group's long-term development and protect the interests of stakeholders including shareholders and financial consumers. In addition, Group ensure the transparent governance by disclosing the business standards, procedures, and results related to governance through the Annual Report on Governance and the website.

**Independence of the Board of Directors:** Financial Group has established the "Guidelines for Independence of Directors" and consider a director independent only when he/she satisfies the Guidelines. Group comply with the Commercial Act and the Act on Corporate Governance of Financial Companies to verify the independence of the Board of Directors and verify the independence of director candidates and incumbents by applying US NYSE regulations or by establishing stricter independence requirements.



**Board Diversity and Expertise:** Financial Group has established the "Board Diversity Guidelines" and ensured the diversity of nationality, gender, age, experience and background of candidates for independent directors based on the Guidelines. Group ensure that female candidates account for at least 20% of standing candidates for independent directors in order to continuously increase the number of female independent directors and appoint independent directors in the global field by linking management strategy directions. In addition, taking into account the characteristics of a financial holding company that exercises overall control over financial companies, Group consider the board's complex expertise in 6 areas of expertise requirements (finance, economy, management, accounting, law and IT) stipulated in the Act on Corporate Governance of Financial Companies.

													-W 011	widicii
Classification	Name	ne Gender	Main Work Experience	Nationality/ Country	Date of First Appointment (Date of First Appointment	Term of Office	Responsible Committees	Board Skill Matrix						
	Name	Gender	Main Work Experience	of Main Activities	as Independent Director)	Term of Office	Responsible Committees	Management		Economy	Accounting		Global	
Independent Director hairperson of the Board of Directors)	Yoon Jae-won	Female	Vice Chairperson, Korean Association of Tax (Current)     Professor, Department of Business Administration,     Hongik University (Current)	US/Korea	2023.03.23. (2020.03.26.)	1 year	Audit Committee     Committee for Recommendation of Presidential Candidates	0			0			
ndependent Director	Kwak Soo-keun	Male	Chairperson, Financial Supervisory Advisory Committee, Financial Supervisory Service     Honosary Professor, Seoul National University Business School (Current)	Korea	2023.03.23. (2021.03.25.)	1 year	Audit Committee     Committee for Recommendation of     Candidates for Chief Executive Officer     of Subsidiaries     Remuneration Committee	0			0			
ndependent Director	Kim Cho-seol	Female	Professor, Department of Economics, Shinshu University     Professor, Department of Economics, Osaka University     of Commerce (Current)	Korea/Japan	2022.03.24.	1 year	ESG Strategy Committee     Committee for Recommendation of Candidates for Independent Directors and Audit Committee Members     Remuneration Committee			0			0	
ndependent Director	Bae Hoon	Male	- Director, Lawyers Association of Zalnichi Korea (LAZAK) - Attorney-at-law, Orbis (Law Firm) (Current)	Korea/Japan	2023.03.23. (2021.03.25.)	1 year	- Audit Committee - Committee for Recommending Presidential Candidates - Committee for Recommendation of Candidates for Chief Executive Officer of Subsidiaries				0	0	0	
ndependent Director	Song Seong-joo	Female	Professor, Department of Statistics, Korea University (Current)     Director, Korea Risk Management Society (Current)	Korea	2024.03.26.	2 years (Newly Appointed)	Risk Management Committee     Committee for Recommendation of Candidates for Independent Directors and Audit Committee Members		0	0				
ndependent Director	Lee Yong-gook	Male	- Cleary Gottlieb Steen & Hamilton LLP <sup>11</sup> (Partner of the New York/Hong Kong office, Representative of the Seoul office) - Clinical Professor, Seoul National University School of Law (Current)	Korea	2023.03.23. (2021.03.25.)	1 year	Risk Management Committee     Committee for Recommendation of Candidates for Chief Executive Officer of Subsidiaries     ESG Strategy Committee		0			0	0	
ndependent Director	Jin Hyun-duk	Male	Visiting Professor, Engineering Research Department, Utsunomiya University     CEO, Phoedra Co., Ltd. (Current) <sup>20</sup>	Когеа/Ларап	2023.03.23. (2020.03.26.)	1 year	Committee for Recommending Presidential Candidates     Committee for Recommendation of Candidates for Independent Directors and Audit Committee Members	0					0	
ndependent Director	Choi Young-kwon	Male	Head of the Fund Management Team,     Government Employees Pension Service     Representative Director, Woori Asset Management	Korea	2024.03.26.	2 years (Newly Appointed)	Risk Management Committee remuneration committee	0	0					
ndependent Director	Choi Jae-boong	Male	Advisor, Financial DT Academy, Korea Banking Institute     Professor, Sungleyunkwan University School of Mechanical Engineering (Current)	Korea	2023.03.23. (2021.03.25.)	1 year	ESG Strategy Committee     Committee for Recommending     Presidential Candidates							
Inside Director epresentative Director/ Chairperson)	Jin Ok-dong	Male	Vice President, Shinhan Financial Holding     President, Shinhan Bank     Representathe Director/Chairperson,     Shinhan Financial Holding (Current)	Korea	2023.03.23.	3 years	Committee for Recommendation of Candidates for Chief Executive Officer of Subsidiaries     ESG Strategy Committee	0	0				0	
Other Non-executive Director	Jeong Sang-hyeok	Male	Vice President, Shinhan Bank     President, Shinhan Bank (Current)	Korea	2023.03.23.	2 years	- ESG Strategy Committee	0	0					Г

**Board Structure:** As of June 2024, the Group's Board of Directors consists of 11 members, including 9 independent directors, 1 permanent director and 1 non-permanent director. The Financial Group ensures that independent directors make up about 82% of the board so that the board can represent various stakeholders, including shareholders, and keep management in control. As of June 2024, Financial Group's board of directors is composed of 11 members, i.e., 9 independent directors, 1 standing director, and 1 non-standing director. Financial Group ensures that independent directors accounts for approximately 82% of the board of directors so that the Board can represent various stakeholders, including shareholders, and keep management in check. In addition, the chairperson of the Board is separated from the CEO in accordance with Article 45 of the Articles of Incorporation and the chairperson of the Board is appointed from among independent directors to realize the independent director-centered BOD operation value. The roles and activities of the Committees under the Board in the reporting year were also announced in detail and specifically.

Committees Under the Board	Key Roles	Major Activities in 2023
Nomination Committee	examine their qualifications	Evaluated and selected candidates for fostering for the Group's management succession     Reported the results of performance evaluation of candidates for fostering for the Group's management succession
Director and Audit Committee Member Nomination Committee	Establish, review and supplement the principles for the appointment of independent directors and audit committee members     Recommend candidates for independent directors and audit committee members     Manage standing candidates for independent directors and verify candidates	Determined independent director candidates for recommendation     Examined and recommended candidates for audit committee members
	Supervise works of directors and management     Monitor internal audit activities and review financial statements     Select and supervise the external auditor	Determined performance targets of the audit team leader     Reported the compliance officer's activities in the preceding year
Committee	Review risk levels and status     Approve the risk management system and improvements	Established and monitored integrated ESG risk management     Approved the change of the Group's trust risk internal rating method     Operated and approved the Basel III liquidity risk (LCR, NSFR) management system

Establish ESG Strategies     Establish sustainable management policies, including climate action and fulfillment of social responsibilities     Monitor ESG achievements	Established tasks to implement carbon emissions reduction and prepared implementation plans therefore     Established plans to respond to additional ESG disclosure requirements related to social value creation and diffusion
Recommend candidates for subsidiary CEOs     Examine qualifications and eligibility of candidates     Evaluate management performance	Evaluated leadership of subsidiary CEOs and selected candidates for fostering for management succession     Reported plans to develop candidates for fosterifor management succession of subsidiaries
Design and operate the remuneration system     Evaluate fairness and appropriateness of remuneration     Reevaluate executive remuneration policies	Established the performance evaluation system f executives, etc.     Examined the fairness and adequacy of the renumeration system
	Establish sustainable management policies, including climate action and fulfillment of social responsibilities     Monitor ESG achievements      Recommend candidates for subsidiary CEOs     Examine qualifications and eligibility of candidates     Evaluate management performance      Design and operate the remuneration system     Evaluate fairness and appropriateness of remuneration

**Board Activities:** Financial Group's Board of Directors have ordinary and extraordinary meetings convened by the chairperson. Financial Group applied the Institutional Shareholder Services (ISS) standard and determined a minimum attendance rate of 75% for all directors. Detailed information on the agenda is provided seven days prior to the board meeting date to ensure sufficient time for independent directors to review. In 2023, Group enacted and revised regulations on governance to strengthen internal control, reviewed major business strategies and plans to enhance group competitiveness, and approved specific action plans to implement ESG strategies.

Board Activities and Attendance				
Classification	Unit	2021	2022	2023
Total Number of Board Meetings Held	Meetings	13	15	14
Agenda Items Resolved	Agendum	26	31	46
Agenda Items Reported	Agendum	89	89	95
Average Attendance	%	100	99	99.4

# 3. Strategy

# GENERAL REQUIREMENTS FOR ESG DISCLOSURE

Elements	Content
Market position, strategy, business model(s) and value chain	<ul> <li>Market position</li> <li>Sustainable Development Goals</li> <li>sIntended direction of the elements of the organisation's strategy that relate to or impact sustainability matters</li> <li>Description of the business model and value chain.</li> </ul>
Interests and views of stakeholders	<ul> <li>Key features and findings of stakeholder engagement</li> <li>The state of key stakeholder relationships and how the organisation has responded to key stakeholders' legitimate needs and interests.</li> </ul>
Material impacts, risks and opportunities and their interaction with strategy and business model(s)	<ul> <li>Description of material sustainability-related risks and opportunities over short-, medium- and long-term horizon, and their link to planning horizon in strategy development</li> <li>Effects on business models and value chains</li> </ul>

Elements	Content			
	Effects on strategy and decision-making			
	Effects on financial position, financial performance and cash flow			
	<ul> <li>Resilience of the strategy to sustainability-related risks.</li> </ul>			

## **GUIDANCE ON DEVELOPING STRATEY DISCLOSURE CONTENT FOR FINANCIAL INSTITUTIONS**

To develop sustainability strategies and goals, FIs should consider their ability to contribute to national and/or international commitments, such as Vietnam's national voluntary commitment to achieve net zero emissions by 2050; national strategies or policies on carbon emission reduction and climate change adaptation; global sustainable development goals and strategies of enterprises in the same industry. Financial institutions can refer to the General Handbook – Part 2, section 2.1.3 and Part 3, section 3.5.

FIs can also refer to documents on the implementation of tasks and solutions according to the National Strategies issued by the Ministry of Finance and the State Bank of Vietnam - summarized in the table below.

STT	National Strategy	Content
1	National Strategy for Green Growth	<ul> <li>Decision No. 1934/QD-BTC in 2024 promulgating action plan of Ministry of Finance of Vietnam for implementation of national strategy for green growth during 2021-2030;</li> </ul>
		<ul> <li>Decision No. 1408/QD-NHNN in 2023 on the promulgating action program of banking sector for implementing national strategy for green growth of 2021 - 2030 period and scheme for tasks and solutions for implementing results of the united nations climate change conference of the parties - COP26.</li> </ul>
2	Securities market development strategy	<ul> <li>Decision No. 941/QD-BTC in 2024 approving the Ministry of Finance's Action Program to implement the Securities Market Development Strategy to 2030.</li> </ul>
3	National Financial Inclusion Strategy	Decision No. 1309/QD-NHNN in 2020 promulgating the action plan of banking sector in implementation of national financial inclusion strategy until 2025 with orientation to 2030.
4	Banking industry development strategy	Decision No. 1604/QD-NHNN in 2018 approving the scheme for green banking growth in Vietnam.

Example 5: ESG Disclosure - Strategy



# Strategy Disclosure of the Securities Company from Korea<sup>41</sup>

# Definition in the market, strategy, business model, and value chain

The company has been affirming its position as a pioneering global investment expert organization in sustainable management (ESG) practices. The company has been recognized by many prestigious ESG assessment organizations at home and abroad, as shown by being continuously included in the S&P Dow Jones World Sustainability Index (S&P DJSI) for 12 consecutive years. At the same time, this company also achieved a high ranking in the field of sustainable development.

**In terms of key strategies** is committed to sustainable growth through its global investments and operations. Company manages various risk factors based on principles and standards, always maintaining a customer-oriented mindset to deliver high-quality assets and products. Key strategic initiatives relate to:

 Global: Company position the Indian market as a central axis of growth, fortifying global wealth management (WM) business and expanding Sales & Trading (S&T) business in advanced markets such as Hong Kong and New York.

- Al-Digital: Al and digital technology are leveraged across all business areas to boost operational efficiency and productivity, fostering new business models and tapping into unexplored markets.
- **Investment:** While thoroughly managing global risk factors, company will remain dedicated to investing in high-quality assets and innovative companies worldwide.
- **Pension:** Company offer various asset allocation strategies that encompass long-term stability and growth, enhancing investment solutions such as robo-advisors and wrap accounts to further improve pension returns.

# ESG Mid - to Long-term strategies

ESG Management Mission Goals 2025

# Sustainable Future

We are committed to pioneering a sustainable future through investment and asset management.



# **ESG Focus Areas**



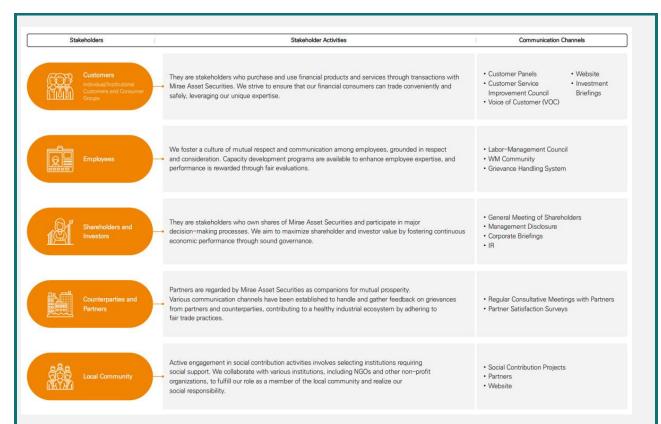
# The Company's value chain:



# Benefits and engagements of stakeholders

The company has joined the United Nations Global Compact (UNGC), committing to comply with 10 principles on human rights, labor, environment and anti-corruption, demonstrating social responsibility according to international standards.

The Group develops the Human Rights Protection Principles in line with global standards and publishes the results of human rights risk assessments and the implementation of human rights management. All employees, partners, and suppliers must commit to complying with this policy. The business has identified key stakeholders, evaluated and built appropriate engagement channels.



# Impacts, risks and key opportunities in alignment with the global expansion model restructuring strategy

Changes in the Business Environment: The shift from traditional trade models focused on product manufacturing and export to service export is gaining momentum with the transition to knowledge-based industries. In Asia, the rise of knowledge-based service exports is expected to drive financial service exports. However, these exports are heavily influenced by national regulations, potentially leading to "bloc" risks where investment capital flow is restricted to specific economic zones or countries.

Risk Impact and Response Activities: As financial exports within Asia increase, the Company, a leader in Korea's financial industry, must achieve competitive edge on par with international financial investment firms in Asia to ensure mid- to long-term market growth. Minimizing bloc risks while operating in various countries requires portfolio rebalancing and strategic overseas expansion. Thus, company is establishing international level competitive advantage as a global financial investment firm, expanding S&T-based businesses and digital retail businesses to mitigate economic bloc risks. In particularly, company bolstered our S&T-based flow business by acquiring the UK ETF specialist market maker "GHCO" in advanced financial markets and signed an acquisition agreement with India's securities firm "Sharekhan" in emerging markets. These strategic overseas expansions enable company to restructure the international financial export model and avoid dependence on specific economic zones.



# Large Insurance Group in Vietnam

With the mission of ensuring peace, prosperity and long-term benefits for customers, investors, employees and the community, the company always associates economic growth with environmental protection and social responsibility - three factors that play a fundamental role in the long-term success of the Group.

# The Group clearly sets out a roadmap towards the goal of Net Zero

#### Giai đoan tới 2025 Giảm 20% lượng phát thải CO<sub>2</sub>

Mục tiêu: Giảm 20% lượng phát thải từ các hoạt động vận hành vào năm 2025

#### Biện pháp:

- · Triển khai các hệ thống quản lý năng lượng thông minh nhằm tối ưu hóa hiệu suất
- Sử dụng thiết bị điện, đèn LED tiết kiệm năng lương và cải tiến hệ thống điều hòa không khí để giảm mức tiêu thụ năng lượng.
- Khuyến khích nhân viên sử dụng xe đạp, xe điện hoặc phương tiên giao thông công công.
- · Lắp đặt hệ thống lưu trữ năng lương tại các tòa nhà để tối ưu hóa việc sử dụng điện từ các nguồn tái tạo.
- Giảm sử dụng giấy in, thúc đầy tài liệu điện tử, thu gom và tái chế rác thải giấy.
- · Triển khai chương trình trồng cây xanh tại các khu vực xung quanh tru sở.

### Giai doan 2025-2030 Giảm 50% lượng phát thải CO<sub>2</sub>

Mục tiêu: Giảm 50% lượng phát thải thông qua việc tối ưu hóa sử dụng năng lượng và phương tiện di chuyển vào năm 2030.

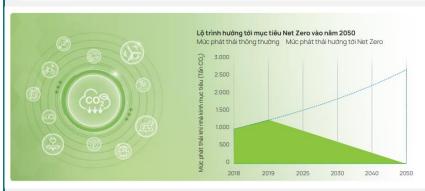
#### Biện pháp:

- · Sử dụng xe điện cho mọi hoạt động giao thông nội bộ và dịch vụ.
- Đầu tư vào các giải pháp kiến trúc xanh và cải tiến hệ thống cách nhiệt để giảm tiêu thụ năng lượng.
- · Lắp đặt hệ thống tái chế rác thải hoặc tái sử dụng nhằm giảm tác động lên môi trường.
- · 50% tòa nhà lắp đặt hệ thống năng lượng tái tạo và giảm thiểu sử dụng năng lượng không tái tạo.
- Khuyến khích sử dụng văn phòng phẩm làm từ vật liệu tải chế, thân thiện với môi trường
- Tạo không gian xanh tại các văn phòng và trồng cây xanh.

#### Giai doan 2030-2040 Giảm 70% lượng phát thải CO<sub>2</sub>

Mục tiêu: Giảm 70% lượng phát thải, tập trung vào việc loại bỏ hoàn toàn các nguồn phát thải từ năng lượng hóa thạch vào năm 2040.

- 100% hệ thống và thiết bị vận hành chạy hoàn toàn bằng năng lượng tải tạo hoặc điện sạch.
- Triển khai các dư án trồng rừng và dư án môi trường để bù đắp lượng carbon không thể tránh khỏi.
- Sử dụng các công nghệ tiên tiến để thu hồi và xử lý lương CO2 phát sinh từ hoạt động vận hành.
- Chỉ hợp tác với các nhà cung cấp và đổi tác có cam kết bảo vê môi trường và phát triển bển vững.
- · Loai bỏ hoàn toàn nhiên liêu hóa thạch trong vẫn hành.



#### Giai đoạn 2040-2050: **Đat Net Zero**

Mục tiêu: Loại bỏ hoàn toàn lượng phát thải CO2 và đạt Net Zero vào năm 2050.

#### Biện pháp:

- Sử dụng 100% năng lượng tái tạo.
- · Tham gia vào thị trường mua bán tín chỉ Carbon để lượng carbon không thể tránh khỏi.

# The Group is committed to economic growth in tandem with environmental protection and social responsibility

Achievements of economic target are associated with social and environmental objective to maintain the interest harmony among related parties at present and in the future with aim at ensuring long-term sustainable development strategy at Group. Group always engages economic growth with environmental protection and social responsibility - three pillars on which a long-term success of Group is built. Among them, economic growth is the most important target since achievement of this goal is critical to fulfill social and environmental objectives.

# Stakeholder benefits and engagements

The Group uses the Double Materiality Assessment Principle to identify key stakeholders based on the level of impact through two dimensions of impact: the impact of the stakeholders on the Group & the impact of the Group on the stakeholders.

The Group connects stakeholders through multi-dimensional information channels, through which sustainability issues in 2023 are mentioned more deeply by the Group to gain the opinions of stakeholders on the activities of the Enterprise related to the Economy - Social - Environment.

Through assessing the importance of issues, the Group makes reasonable investments and allocates resources to meet the expectations of stakeholders as well as ensure the sustainable development of the Group.







# Risk management towards sustainability at the Group

The Group considers sustainability risks as one of the key risks, with the identification and method of monitoring and managing risks



- Các rùi ro tác động đến sự phát triển bển vững trong hệ thống Bảo Việt;
- Các rủi ro của môi trường, xã hội tác động đến Bào Việt:
- Các rủi ro từ hoạt động kinh doanh của Bảo Việt tác động đến môi trường, xã hội.
- Chiến lược phát triển kinh doanh luôn ưu tiên các mục tiêu phát triển bền vững.
- · Theo dõi định kỳ các chỉ số tài chính và phi tài chính.
- Quản lý bằng quy trình, quy chế; thực hiện kiểm toán nội dung Phát triển bến vững bởi Kiểm toán độc lập và kiểm toán nội bộ.

Sustainability risk management measures are implemented to minimize risks to the business itself, while controlling the negative impacts from business activities to the sustainable development process, ensuring long-term benefits for investors, customers and the community.

#### Tác động đến hoạt động kinh doanh Tác động đến tiến trình Biện pháp quản lý rủi ro phát triển bền vững của Bảo Việt phát triển bền vững Đánh giá rủi ro dư án đầu tư Đánh giá tác đông môi trường và xã hôi trước khi thực Giảm thiểu rủi ro tài chính và tăng cường Đảm bảo dư án không chỉ mang lai lợi ích hiên đầu tư, xem xét lợi ích dài hạn cho cộng đồng và kinh tế mà còn thúc đẩy sư phát triển lâu giá trị bền vững trong các dư án đầu tư. tuân thủ tiêu chuẩn bển vững. dài của cộng đồng và môi trường. Quản lý rủi ro đối với Nâng cao uy tín thương hiệu Bảo Việt Đánh giá các tiêu chí an toàn lao đông, bảo vê môi Thúc đẩy trách nhiệm xã hội trong hoạt khách hàng tổ chức trường và tuân thủ pháp luật trước khi cấp bảo hiểm trong việc bảo vệ môi trường, nhưng có động kinh doanh của doanh nghiệp, giúp cho khách hàng tổ chức. Từ chối bảo hiểm nếu doanh thể giới hạn khách hàng tiềm năng. tạo ra chuẩn mực bảo vệ môi trường và nghiệp không đạt chuẩn. xã hội. Quản lý nôi bô Triển khai các biện pháp tiết kiệm điện, nước, sử Giảm chi phí vân hành, han chế tác động Giảm thiểu tác động tiêu cực lên môi dụng vật liệu tái chế, giám sát chặt chẽ việc tiêu thụ môi trường từ hoạt động nôi bô, nâng cao trường, đồng thời tạo ra một văn hóa bền nhân thức nhân viên về bảo vê tài nguyên. vững trong toàn hệ thống. tài nguyên. Đảm bảo chuỗi cung ứng của Bảo Việt Giảm thiểu rủi ro gián tiếp đến môi trường Đánh giá nhà cung cấp Áp dụng tiêu chí ESG (Môi trường, Xã hội, Quản tri) để và xã hội, tạo ra sự gắn kết bền vững với lựa chọn nhà cung cấp, đảm bảo đối tác cũng tuân thủ tuân thủ các tiêu chuẩn phát triển bển vững, giảm rủi ro gián tiếp từ đối tác.

The Group assesses the impacts of sustainable development trends on the Group. The Group recognises a number of risks and challenges that may impact the Group's operations. These challenges and risks are assessed according to the degree of impact on the Group's business operations and the interests of stakeholders.

- Climate change: The Group joins hands to contribute to solving global challenges from climate change, recognizing
  its responsibility in jointly solving challenges through the development of specialized products such as One-storm
   tropical storm insurance, agricultural insurance, etc. rice insurance... contributing to mitigating the damage and
  consequences of climate change.
- Circular economy: The Group recognizes that the process of building a circular economy requires technology and innovation to reuse resources efficiently, to achieve sustainable development goals

Net-zero target: The Group accompanies Vietnam in implementing the goals of the COP28 conference. The Group has always associated Economic Growth with Environmental Protection and Social Responsibility - three factors that play a fundamental role in the Group's long-term success. In order to proactively adapt and realize the commitment to action in the application of technology to reduce emissions in business activities, the Group has focused on building a digital

ecosystem, bringing added value to customers by optimizing data and workflows from departments, tools, internal systems, as well as with customers, suppliers and external partners.

# 4. Risk Management

# GENERAL REQUIREMENTS FOR ESG DISCLOSURE

#### Elements Content Description of A description of the methodologies, assumptions and proprietary tools applied in processes the sustainability-related risks and opportunities identification, assessment and and related policies the prioritization processes organisation uses An overview of the process(es) to identify, assess and prioritise the to identify, assess organisation's potential and actual impacts on people and the environment and prioritise sustainability-An overview of the process(es) used to identify, assess and prioritise related risks and sustainability-related risks and opportunities that have or may have financial opportunities effects Description of the How the process(es) to identify, assess and manage sustainability-related risks extent to which, are integrated into the enterprise's risk management framework and used to and how, the evaluate overall risk profile and risk management processes processes for • How the process(es) to identify, assess and manage sustainability-related managing opportunities is/are integrated into the undertaking's overall management sustainabilityprocess (where applicable) related risks and opportunities whether the process(es) has/have changed compared to the prior reporting integrated into the period, when the process(es) was/were modified for the last time and future revision dates of the materiality assessment. organisation's overall risk Policies and actions adopted to address material impacts and/or risks and/or to management pursue material opportunities. process

# GUIDANCE ON DEVELOPING RISK MANAGEMENT DISCLOSURE CONTENT FOR FINANCIAL INSTITUTIONS

Risk Management disclosure aims to provide information on how the organisation identifies, assesses, prioritises and monitors sustainability-related risks and opportunities and how these fits in the enterprise risk management system.

Integrating ESG considerations into a organisation's existing risk management framework supports the achievement of both overall business objectives and specific ESG goals. Financial institutions may refer to the Enterprise Risk Management (ERM) – ESG Framework developed by the Committee of Sponsoring Organizations of the Treadway Commission (COSO), to ensure that sustainability-related risks are identified, assessed, prioritized, and aligned with business operations. Organizations should also refer to regulations on environmental, social, and governance risk management as defined by relevant sector-specific regulations.

Financial institutions can refer to the General Handbook – Part 2, section 2.2.2 and Part 3, section 3.6.



## One of the largest financial group in Southeast Asia, headquartered in Malaysia

Group Sustainability Risk Management Framework is supported by the three lines-of-defence model, which promotes clear accountability and consistency in risk management across the Group. Sustainability risk is identified and managed as a key risk under our EWRM Framework. As defined in our Group Risk Library, it impacts other risk areas such as credit, market, liquidity, operational and reputational risk.

The Group assess a wide range of factors in our business transactions and operations, including:

- (i) environmental issues: such as climate change, nature impacts and resource use;
- (ii) social considerations: including community wellbeing and workplace practices;
- (iii) economic challenges: such as market shifts and resource costs; and ethical concerns, including transparency and responsible governance.

The environmental, social, economic and ethical risks outlined can result in financial risks to clients and other stakeholders, and ultimately to Group. In making financing and business decisions, Group consider these risks in line with sustainability commitments:



# Credit Risk

The potential for financial losses arising from a client's inability to meet their obligations to the Bank due to reasons such as failure to anticipate and manage environmental and social risks in their business inadequate control over environmental impacts or poor management oversight

#### Collateral Risk

The potential for financial losses arising from the loss to reasons such as a client's failure to adequately protect these assets through effective environmental and social risk management systems and controls



The potential impacts of legal or regulatory noncompliance due to the failure to adequately address environmental and social risks leading to punitive measures such as regulatory fines, penalties or



#### **Reputational Risk**

The potential risk of reputational damage to the Bank, either directly or by association, due to material issues such as legal or regulatory non-compliance, failure to meet ESG commitments, or involvement in significant controversies that could impact stakeholder trust



The potential for disruption and negative shifts in the due to environmental and social risks linked to their production or consumption



## **Technology Risk**

The potential risks related to technologies and machinery due to reasons such as the transition to more sustainable, low-carbon and energy-efficient production methods, resulting in loss of customers and market share



The risk of loss arising from inadequate or failed processes, people and systems, or from external events, such as non-compliance with ESG standards

#### Liquidity Risk

The risk of not being able to meet short-term financial demands due to insufficient cash, the inability convert a security or hard asset to cash without a loss of capital and/or income in the process. This includes challenges arising from sustainability factors, such as the inability to liquidate assets tied to sustainable investments or the financial impact of failing to adhere to ESG commitments

The Group proactively identify and assess these emerging risks early. The Group gather insights from trusted sources like industry reports, market trends, discussions with regulators, stakeholder feedback and collaborative conversations that guide our decision-making.

# **Emerging Risk**

**Biodiversity** 

Loss and

Collapse

Ecosystem

# Description of Risk

## **Biodiversity Loss**

The decline in species diversity and abundance, along with the degradation of ecosystems and their services. This can result from habitat destruction, pollution, climate change, overexploitation of resources and the introduction of invasive species.

## Ecosystem Collapse

The rapid and irreversible deterioration of an ecosystem's structure, function, and services. This can be triggered by major disturbances such as natural disasters, disease outbreaks, or human interventions that disrupt the delicate tween species and their environment.

## **Potential Business Impact**

Biodiversity loss and ecosystem collapse present significant risks to human wellbeing and both the ASEAN and global economies. Key impacts include:

- Reduced agricultural productivity, disrupting supply chains and impacting food security .
- Increased disease transmission due to the loss of natural pest control mechanisms
- Disproportionate harm to vulnerable communities
- Business disruptions for sectors dependent on ecosystem services

For financial institutions, negative impacts can be both direct and indirect through lending, financing, investment and underwriting activities

## Mitigating Actions

place since 2022 🙉.

We recognise the importance of biodiversity protection and restoration in maintaining ecological balance. Our key actions include

- Contributing to government policy consultations and
- industry working groups to shape future policies Engaging with industry players to understand challenges and explore ways forward
- Participating in international discussion forums to implement best practices.

In 2024, we published our Statement on Biodiversity and Nature and commenced development of a strategy and roadmap. Set for publication in 2025 alongside sectoral assessments, these initiatives build on our NDPE commitment requirement, which has been in



and Severity

Probability



# 5. Metrics and targets

GENERAL REQUIREMENTS FOR ESG DISCLOSURE

Elements	Content
Metrics in relation to material sustainability matters	<ul> <li>The organisation should disclose any metrics that it uses to evaluate performance and effectiveness, in relation to a material impact, risk or opportunity, explaining their significance, their implications.</li> <li>Metrics should include:         <ul> <li>Metrics defined in the organisation's selected reporting standard;</li> <li>Metrics identified on an entity-specific basis, whether taken from other sources or developed by the organisation itself.</li> </ul> </li> </ul>
Targets to track effectiveness of policies and actions	<ul> <li>Disclose whether the target is absolute or intensity-based, the relevant time frame over which the target applies and the base year from which progress is measured</li> <li>the specific quantitative or qualitative target the organisation has set or is required to meet;</li> <li>the methodologies and significant assumptions used to define targets;</li> <li>performance against each target and an analysis of trends or changes in the organisation's performance.</li> </ul>

### GUIDANCE ON DEVELOPING METRICS AND TARGETS DISCLOSURE CONTENT FOR FINANCIAL INSTITUTIONS

Together with narrative disclosures under the governance, strategy and risk management core elements, metrics and targets disclosures will help to form comprehensive and decision-useful view of both qualitative and quantitative information. Financial institutions can refer to the General Handbook – Part 3, section 3.7 for more detailed information.

Each organisation needs to assess the materiality and relevance of the topics and disclosure contents in relation to its operations and objectives. At the same time, financial institutions should consider including reports on environmental, social, and governance indicators as required by regulations, alongside international disclosure frameworks and standards. Refer to the list of some relevant documents and objectives in Part 2, Section 3 – Strategy.

The table below summarizes several disclosure metrics recommended by SASB for each sub-group, intended for reference by financial institutions. These metrics are aligned with the list of material topics for each group as presented in Part 2 - Section 1, including:

- 1. Mortgage finance
- 2. Consumer Finance
- 3. Commercial Banking
- 4. Investment Banking & Brokerage
- 5. Asset Management & Custody Activities
- 6. Insurance

FIs can look up the activities of the organization in which subgroup it belongs to at: <a href="https://sasb.ifrs.org/find-your-industry/">https://sasb.ifrs.org/find-your-industry/</a>. At the same time, FIs can look up the definition and specific calculation method for the indicators given in the table below in SASB Standard: <a href="https://sasb.ifrs.org/standards/materiality-finder/find/">https://sasb.ifrs.org/standards/materiality-finder/find/</a>

Table 4: Disclosure metrics for Financial Institutions by category - Recommended by SASB

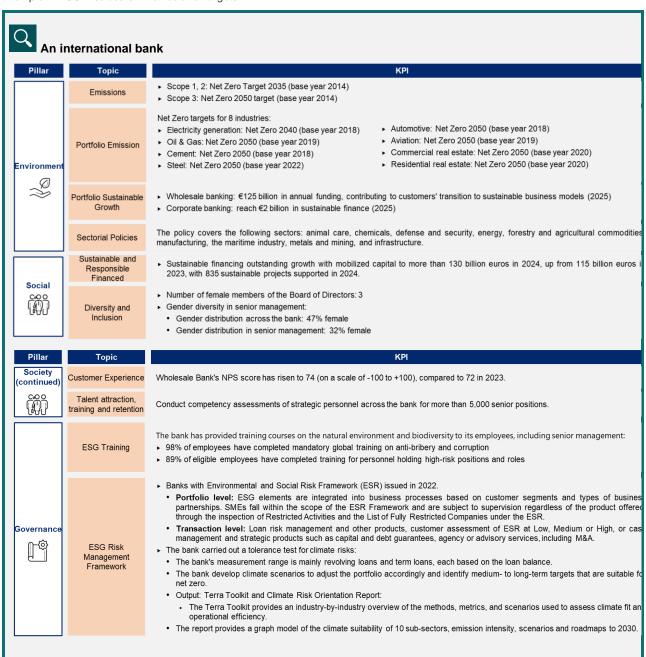
Topis	Index	Unit
Mortgage Finance <sup>42</sup>		

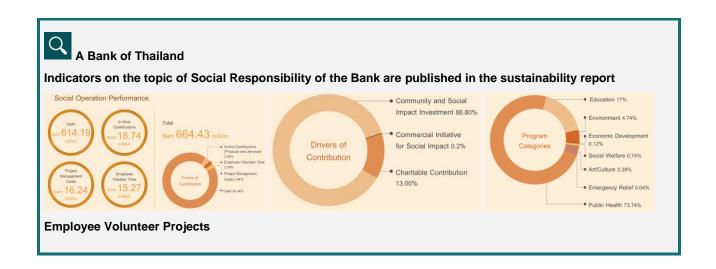
Topis	Index	Unit
Lending practices	(1) Number and (2) value of residential mortgages of the following types: (a) combined fixed- and variable-rate, (b) prepayment penalty, and (c) total	Number, Presentation currency
	(1) Number and (2) value of (a) residential mortgage modifications, (b) foreclosures, and (c) short sales or deeds in lieu of foreclosure	Number, Presentation currency
	Total amount of monetary losses as a result of legal proceedings associated with communications to customers or remuneration of loan originators	Presentation currency
	Description of remuneration structure of mortgage loan originators	N/A
Discriminatory lending policy	(1) Number, (2) value, and (3) weighted average loan-to-value ratio of mortgages issued to (a) minority and (b) all other borrowers	Number, Presentation currency, Percentage (%)
	Total amount of monetary losses as a result of legal proceedings associated with discriminatory mortgage lending	Presentation currency
	Description of policies and procedures for ensuring non- discriminatory mortgage origination	N/A
Environmental Risk to Mortgaged	(1) Number and (2) value of mortgage loans in 100-year flood zones	Number, Presentation currency
Properties	(1) Total expected loss and (2) Loss Given Default (LGD) attributable to mortgage loan default and delinquency because of weather-related natural catastrophes, by geographical region	Number, Presentation currency, Percentage (%)
	Description of how climate change and other environmental risks are incorporated into mortgage origination and underwriting	N/A
Consumer Fina	nce <sup>43</sup>	
Customer Privacy	Number of account holders whose information is used for secondary purposes	Number
	Total amount of monetary losses as a result of legal proceedings associated with customer privacy	Presentation currency
Data Security	(1) Number of data breaches, (2) percentage that are personal data breaches, (3) number of account holders affected	Number, Percentage (%)
	Card-related fraud losses from (1) card-not-present fraud and (2) card-present and other fraud	Presentation Currency
	Description of approach to identifying and addressing data security risks	N/A
Selling Practices	Percentage of total remuneration for covered employees that is variable and linked to the amount of products and services sold	Percentage (%)
	Approval rate for (1) credit and (2) pre-paid products for applicants	Percentage (%)
	<ul> <li>(1) Average fees from add-on products</li> <li>(2) average APR of credit products</li> <li>(3) average age of credit products</li> <li>(4) average number of credit accounts</li> <li>(5) average annual fees for pre-paid products</li> </ul>	Presentation currency, Percentage (%), Months, Number
	(1) Number of customer complaints filed (2) percentage with monetary or non-monetary relief	Number, Percentage (%)
	Total amount of monetary losses as a result of legal proceedings associated with selling and servicing of products	Presentation currency
Commercial Ba	nks <sup>44</sup>	
Data Security	(1) Number of data breaches, (2) percentage that are personal data breaches, (3) number of account holders affected	Number, percentage (%)

Topis	Index	Unit
	Description of approach to identifying and addressing data security risks	N/A
Financial Inclusion and Capacity	(1) Number and (2) amount of loans outstanding that qualify for programmes designed to promote small business and community development	Number, Presentation Currency
Building	(1) Number and (2) amount of past due and nonaccrual loans or loans subject to forbearance that qualify for programmes designed to promote small business and community development	Number, Presentation Currency
	Number of no-cost retail checking accounts provided to previously unbanked or underbanked customers	Number
	Number of participants in financial literacy initiatives for unbanked, underbanked, or underserved customers	Number
Incorporation of approach to incorporation of environmental, social and governance (ESG) factors in credit analysis  Environmental, Social, and Governance Factors in Credit Analysis		N/A
Financed Emissions	Absolute gross financed emissions, disaggregated by (1) Scope 1, (2) Scope 2 and (3) Scope 3	Metric tons (t) CO <sub>2</sub> -e
	Gross exposure for each industry by asset class	Presentation currency
	Percentage of gross exposure included in the financed emissions calculation	Percentage %
	Description of the methodology used to calculate financed emissions	N/A
Business Ethics	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, antitrust, anti-competitive behaviour, market manipulation, malpractice, or other related financial industry laws or regulations	Presentation Currency
	Description of whistleblower policies and procedures	N/A
System Risk Management	Global Systemically Important Bank (G-SIB) score, by category	Basis Points (bps)
	Description of approach to integrate results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities	N/A
Investment Ban	king and Brokerage <sup>45</sup>	
Employee Diversity & Inclusion	Percentage of (1) gender and (2) diversity group representation for (a) executive management, (b) non-executive management, (c) professionals, and (d) all other employees	Percentage (%)
	Revenue from (1) underwriting, (2) advisory and (3) securitisation transactions incorporating integration of environmental, social and governance (ESG) factors, by industry	Presentation currency
Social, and Governance Factors in Investment Banking & Brokerage Activities	(1) Number and (2) total value of investments and loans incorporating integration of environmental, social and governance (ESG) factors, by industry	Number/ Presentation currency
	Description of approach to incorporation of environmental, social and governance (ESG) factors in investment banking and brokerage activities	N/A
Business Ethics	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, antitrust, anti-competitive behaviour, market manipulation, malpractice, or other related financial industry laws or regulations	Presentation currency

Topis	Index	Unit
	Description of whistleblower policies and procedures	N/A
Professional Integrity	(1) Number and (2) percentage of licensed employees and identified decision-makers with a record of investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings	Number/percentage (%)
	Number of mediation and arbitration cases associated with professional integrity, including duty of care, by party	Number
	Total amount of monetary losses as a result of legal proceedings associated with professional integrity, including duty of care	Presentation currency
	Description of approach to ensuring professional integrity, including duty of care	N/A
System Risk	Global Systemically Important Bank (G-SIB) score, by category	Basis Points (bps)
Management  Description of approach to integrate results of mandatory and voluntary stress tests into capital adequacy planning, long-term corporate strategy, and other business activities		N/A
Asset managen	nent and custody activities	
Transparent Information & Fair Advice for Customers	(1) Number and (2) percentage of licensed employees and identified decision-makers with a record of investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings	Number/percentage (%)
	Total amount of monetary losses as a result of legal proceedings associated with marketing and communication of financial product-related information to new and returning customers	Presentation currency
	Description of approach to informing customers about products and services	N/A
Employee Diversity & Inclusion	rersity & (a) executive management, (b) non-executive management, (c)	
Incorporation of Environmental,	Amount of assets under management, by asset class, that employ (1) integration of environmental, social, and governance (ESG) issues, (2) sustainability themed investing and (3) screening	Presentation currency
Social, and Governance Factors in Investment Management & Advisory	Description of approach to incorporation of environmental, social and governance (ESG) factors in investment or wealth management processes and strategies	N/A
	Description of proxy voting and investee engagement policies and procedures	N/A
Financed Emissions	Absolute gross financed emissions, disaggregated by (1) Scope 1, (2) Scope 2, and (3) Scope 3	Metric Tonnes (t) CO <sub>2</sub> -e
	Total amount of assets under management (AUM) included in the financed emissions disclosure	Presentation currency
	Percentage of total assets under management (AUM) included in the financed emissions calculation	Percentage %
	Description of the methodology used to calculate financed emissions	N/A
Business Ethics	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, antitrust, anti-competitive behaviour, market manipulation, malpractice, or other related financial industry laws or regulations	Presentation currency
	Description of whistleblower policies and procedures	N/A
Insurance		
Transparent Information & Fair Advice for	Total amount of monetary losses as a result of legal proceedings associated with marketing and communication of insurance product-related information to new and returning customers	Presentation currency
Customers	Complaints-to-claims ratio	Rate

Topis	Index	Unit
	Customer retention rate	Rate
	Description of approach to informing customers about products	N/A
Incorporation of Environmental, Social and Governance Factors in Investment Management	governance (ESG) factors in investment management processes and strategies and ance in nent	
Policies Designed to	Net premiums written related to energy efficiency and low carbon technology	Presentation currency
Incentivise Responsible Behaviour	Discussion of products or product features that incentivise health, safety or environmentally responsible actions or behaviours	N/A
Financed Emissions	Absolute gross financed emissions, disaggregated by (1) Scope 1, (2) Scope 2, and (3) Scope 3	Metric Tonnes (t) CO <sub>2</sub> -e
	Gross exposure for each industry by asset class	Presentation currency
	Percentage of gross exposure included in the financed emissions calculation	Percentage %
	Description of the methodology used to calculate financed emissions	N/A
Physical Risk Exposure	Probable Maximum Loss (PML) of insured products from weather-related natural catastrophes	Presentation currency
	Total amount of monetary losses attributable to insurance pay-outs from (1) modelled natural catastrophes and (2) non-modelled natural catastrophes, by type of event and geographical segment (net and gross of reinsurance)	Presentation currency
	Description of approach to incorporation of environmental risks into (1) the underwriting process for individual contracts and (2) the management of entity-level risks and capital adequacy	N/A
System Risk Management	Exposure to derivative instruments by category: (1) total exposure to non-centrally cleared derivatives, (2) total fair value of acceptable collateral posted with a central clearinghouse, and (3) total exposure to centrally cleared derivatives	Presentation currency
	Total fair value of securities lending collateral assets	Presentation currency
	Description of approach to managing capital- and liquidity-related risks associated with systemic non-insurance activities	N/A





Number of employees engaging in volunteer activities:	19,810 persons	
(8,915 during working hours and 10,895 outside working hours)		
Volunteer hours by employees:	220,155 hours	
(99,070 during working hours and 121,085 outside wo	rking hours)	
External persons participating in volunteer activities:	7,112 persons	
Volunteer hours of external persons:	62,937 hours	
Amount of budget supported by KBank for volunteer projects:	Baht 2,017,693.83	
In-kind contribution beyond bank support:	Baht 1,728,862.31	
Project implementation budget beyond bank support:	Baht 2,180,932.41	
Donations for the program/activities:	Baht 1,548,464.25	
Beneficiaries:	152,181 persons	



One of the largest financial group in South Korea

#### The Group announces a data set of indicators related to sustainable development "ESG DATA PACK"

As a major corporation in the financial services sector, the Group transparently announces the amount of financed emissions by asset class and industry

Indicators		Unit	2021	2022	202
Financed emissions target		— tCO₂eq -	41,100,060	40,890,324	39,433,17
Financial emissions		tco2eq -	46,688,085	50,982,536	50,060,68
Financial emissions intensity		tCO2eq/KRW billion	20.5	20.8	20.
Asset class	Total		46,688,085	50,982,536	50,060,68
	Listed equity & bond		7,212,984	5,596,149	4,477,59
	Corporate loan & unlisted equity		36,016,983	41,734,737	42,611,19
	PF		2,320,360	2,549,265	1,914,74
	Real estate		530,679	592,559	656,18
	Mortgage		137,519	129,861	120,83
	Vehicle loan		469,560	379,965	280,12
	Sovereign bond	_	-	-	22,000,81
Sector	Total <sup>1)</sup>	tCO₂eq	43,229,968	47,330,886	47,088,79
	Power Generation		4,807,281	3,180,687	2,181,67
	Aluminum		2,658,403	3,024,877	3,487,29
	Cement		907,712	1,003,066	1,241,19
	Iron & Steel		4,147,669	4,475,830	4,184,82
	Paper		722,587	812,340	813,29
	Transportation		1,030,344	1,080,495	1,227,62
	Oil & Chemical		4,572,927	5,756,406	6,537,71
	Others		24,383,045	27,997,185	27,415,17

The Group announces greenhouse gas emissions: Announces Scope 1, Scope 2, and also Scope 3 on greenhouse gas emissions. In particular, Scope 3 emissions are mainly focused on Portfolio 15: Financed **Emissions** 

Indicators		Unit	2021	2022	2023
Scope 1+2 target <sup>2)</sup>			92,745	88,679	84,613
Location- based	Scope 1+2		101,188.4	100,079.8	97,798.5
	Scope 1		15,175.5	14,697.0	14,967.0
	Scope 2	tCO <sub>2</sub> eq	86,012.9	85,382.7	82,831.5
Market- based	Scope 1+2		101,188.4	100,079.8	69,756.6
	Scope 1		15,175.5	14,697.0	14,967.0
	Scope 2		86,012.9	85,382.7	54,790
Green house gas er	nissions intensity <sup>3)</sup> (employee <sup>4)</sup> )	tCO₂eq/person	4.33	4.28	4.19
Green house gas emissions reduction rate <sup>5)</sup>		%	-4.65	1.10	2.28

1) In the cases of GHG assurance statement, there are differences from actual emissions due to rounding for the principle of using whole numbers. 2) Market-based

3) Location-based 4) Total employees (full-time + contract) 5) Newly reported in 2023

Indicators		Unit	2021	2022	2023
Total	Scope 3		50,858,127	54,970,557	55,986,848
1. Purchase of	Printing paper		1,135.4	1,192.0	1,093.3
products	Credit card	tCOzea	75.4	89.5	89.9
	Bank book	tcozeq	97.4	38.7	84.5
	Tap water		128.4	90.3	65.4
	Ground water		2.4	18.4	4.9
6. Business trips	Airline		32.0	205.7	1,526.3
	Train		31.5	72.4	122.3
	Bus		2.2	5.0	6.4
	Car		28.0	29.8	78.0
7. Employee commutin	Employee commuting		14,268.3	12,907.7	8,528.1
11. Product use	Internet banking		1,070.5	1,352.1	671.9
	Mobile web & mobile app		1,500.5	1,641.6	1,848.4
2. Product disposal	Credit card		191.9	221.5	127.1
	Bank book		46.0	18.3	5.4
15. Investment (financ	ed Group assets		46,688,085.0	50,982,536.0	50,060,685
emissions)	Customer assets		4,141,718	3,960,068	5,899,938
		KRW trillion	227	245	251

#### (Incomplete)

The Group declared a "Zero Carbon Drive" strategy to achieve carbon neutrality through finance and has obtained approval for its carbon reduction targets through SBTi.

Group set a goal of cumulatively investing KRW 30 trillion in green finance by 2030 and successfully provided green finance worth KRW13.3 trillion in 2023.

Group aims to convert 100% of the electricity used by all group companies to renewable energy by 2040 by implementing RE100 and intends to achieve zero internal emissions by 2044.

Based on its eco-friendly roadmap, Group has set targets for minimizing plastic waste by 2040, i.e., achieving 50% digital cards without physical cards (NP 50) and 100% eco-friendly cards made of recycled plastic (BP 100) by 2040.

Group sets the ratio of male and female employees by management level and by role as an indicator to implement DEI and establishes and manages 2030 targets.

# SECTION 3: ADDITIONAL GUIDANCE ON CLIMATE-RELATED DISCLOSURE

Financial institutions provide loans, investments, and insurance to various industries and sectors; they finance all business and production activities across the economy, from high-emission operations to those that support the energy transition and aim toward a low-carbon economy. Therefore, achieving a net-zero emissions target across the entire economy requires financial institutions to consider climate-related risks in their capital allocation decisions to guide industries and sectors.

Climate-related information disclosure will gradually become an important mandatory requirement in the near future for financial institutions around the world. The Task Force on Climate-related Financial Disclosures (TCFD) has provided a globally recognized climate disclosure framework for financial institutions, and at the same time, other climate-related disclosure frameworks and standards are also referenced and aligned to ensure consistency with the TCFD.

Given the complexity of developing TCFD-aligned climate disclosures, financial institutions in Vietnam need to carefully assess and consider their implementation roadmap based on stakeholder requirements and available resources. Businesses may choose to integrate and embed climate-related disclosures aligned with TCFD into their ESG reports by element or issue a standalone TCFD disclosure report.

Financial institutions can refer to climate-related disclosure guidelines in the General Handbook – Part 3, Section 3, for each reporting element. In addition, this part of the Sectoral guidance will focus on providing some additional guidelines for financial institutions to refer to when disclosing climate-related information in alignment with TCFD for 4 key elements: Governance, Strategy, Risk Management and Metrics and Targets.

Additionally, the TCFD categorizes the financial sector into four main groups, primarily based on their activities: banks (lending activities), insurance companies (underwriting activities), asset managers (asset management activities), and asset owners, including pension funds, non-profit funds, and both public and private sector funds (investment activities). TCFD has developed supplementary guidance for these groups — and this information will also be compiled and presented in this section of the sectoral guidance.

Accordingly, guidance for climate-related disclosure in each element will include:

- Element climate-related disclosure requirements as set out in the General Handbook section 3, section 3; enclosed with additional information disclosure requirements of financial institutions and sub-sectors (if any)
- Guidelines for developing climate-related disclosure for financial institutions
- An example illustrates the disclosure content.

#### 1. Governance

#### TCFD CLIMATE-RELATED RECOMMENDED DISCLOSURES

Element	TCFD climate-related recommended disclosures
Board oversight of climate-related matters	<ul> <li>Organizational chart that illustrates which board committee(s) are responsible and the frequency (e.g., annually, quarterly, more than quarterly) of those committees</li> </ul>
	Summary of key issues and initiatives discussed with the board during the current reporting period
	ESG experience of board members in a summary of board credentials and experience and/or individual biographies
Management's role in the governance processes, controls and procedures used to monitor, manage and	List of management level committees and or functions (e.g., Environmental and Social Risk Management function) related to climate change management

Element	TCFD climate-related recommended disclosures
oversee climate-related matters	<ul> <li>Frequency (e.g., annually, quarterly, more than quarterly) of committees or executives reporting to the board to assess and manage climate-related risks and opportunities</li> </ul>
Integration of climate- related performance in incentive schemes	Details of the board and executive member incentives linked to climate initiatives and a description of the criteria for the incentive compensation, including connection to specific metrics.

### GUIDANCE ON DEVELOPING CLIMATE-RELATED GOVERNANCE DISCLOSURES FOR FINANCIAL INSTITUTIONS

Example 8: Climate-related disclosure - Governance



#### Climate-related governance reporting at a large bank in Canada<sup>46</sup>

#### **Board oversight**

The Board of Directors a (the Board) oversees the bank's strategic direction, plans and priorities and ensures they align with the bank's risk appetite. It discusses and challenges management in setting enterprise strategy and monitors its implementation and effectiveness. It annually approves the strategic plan, taking into account the opportunities and risks of the bank's business. The Board oversees strategic approach to climate change, including how the bank manages climate-related risks and opportunities. In 2023, the Board engaged regularly with management on the evolving climate change landscape and trends and received updates on the bank's climate strategy and actions in response.

			ВС	OARD OVERSIG	нт			
			1	Board of Director	s			
Governa	nce committee	1	Risk committee		Audit committe	ee	Human resource	committee
			MANA	GEMENT OVER	RSIGHT			
			Ch	ief Executive Offi	cer			
Chief Administrative & Strategy Officer	Chief Risk Officer	Chief Financial Officer	Chief Legal Officer	Chief Human Resources Officer	Group Head & CEO, RBC Capital Markets	Group Head, Personal & Commercial Banking	Group Head, RBC Wealth Management & RBC Insurance	Group Head, Technology & Operations
			Managem	ent Committees &	& Councils			
	Strategy & targets	;		Risk management	:		Disclosure	
Climate Steering Committee Leads the enterprise climate strategy, supporting its execution across key businesses and functions, and provides recommendations and updates to the GE and business leaders on climate-related priorities.		Group Risk Management Operating Committee Oversees the management of RBC's key risks, including E&S risk. Reviews and recommends onwards submissions of quarterly updates on enterprise-wide trends in significant risks and emerging risks, including updates on E&S risk to the Group Risk Committee and the Risk Committee of the Board.		Disclosure Committee Oversees RBC's disclosure practices and ensures adherence by RBC, its directors, officers, and employees to RBC's disclosure obligations under applicable laws and regulations and the Disclosure Policy.				
Climate Performance & Reporting Forum Aligns and supports decision-making on key topics related to RBC's climate strategy, such as financed emissions reporting, target-setting and related disclosures.		party relationships, products, services, initiatives, and strategies with potentially significant reputation risk, including E&S risk.		ESG Disclosure Council  Subcommittee of the Disclosure Committee. Provides executive direction and oversight of ESG disclosures, and supports controls and disclosure strategy alignment and integration across the organization.				
			IN	MPLEMENTATIO	ON			
	Corp	oorate Teams				Client-Facing	g Teams	
	mate Strategy & Govern ent, RBC Climate Action		nship & ESG, Environme		include RBC Capital Mo le Finance Group	orkets Sustainable Fin	ance Group, Business Ban	king
Regional & Business-level Committees								

#### Board committee oversight and climaterelated agenda items

The Board and its four committees provide oversight of the Bank's strategic approach to ESG, including climate change, and engage with management on climate-related topics throughout the year. Key climate-related topics discussed by the Board and Board committees in 2023 are outlined on the 2024 Management Proxy Circular (2024 Proxy Circular).

#### Directors' expertise in ESG and climate education

To help support Bank in achieving its Purpose to help clients thrive and communities prosper, all directors are required to have experience in environmental, social and governance matters, which they have acquired in a variety of ways, including through their professional experience or their educational background. More specifically, experience in environmental matters is derived from positions as senior executives, directors or advisors of large utility, energy or natural resources companies, or at organizations focused on climate- or sustainability-related matters. For more information, see Skills and competencies on the 2024 Proxy Circular.

Effective climate oversight and board engagement require directors to keep pace with the rapidly evolving and complex climate change landscape. For more information see Skills and competencies, and Environmental, social and governance matters, and Focus on continuous education on above document.

	Oversight responsibilities related to climate
Board	<ul> <li>Oversees the bank's strategic approach to climate change, which includes how we manage climate-related risks and opportunities</li> </ul>
Governance	<ul> <li>Advises the Board on ESG matters, including climate change, and provides oversight and coordination over ESG for the Board and its committees</li> <li>Advises on the status and adequacy of the bank's efforts to meet high standards of conduct and environmental and social (E&amp;S) responsibility</li> <li>Oversees key ESG disclosures for the Board</li> <li>Oversees the bank's corporate citizenship strategy</li> </ul>
Risk	Oversees significant and emerging risks to the bank, including E&S risks Each year, recommends for Board approval, the Enterprise Risk Appetite Framework, which incorporates consideration of E&S risks when making risk management decisions
Audit	Oversees the bank's financial reporting, internal controls over financial reporting and disclosure controls and procedures, including the E&S risk-related disclosures (including climate change) in the bank's annual report
Human Resources	<ul> <li>Oversees the bank's compensation principles, policies and programs</li> <li>Recommends for Board approval Chief Executive Officer and Group Executive (GE) compensation, including short-term incentives, which consider environmental sustainability, and social and governance practices and, mid- and long-term incentives, which, beginning in fiscal 2023, include a medium-term climate modifier based on progress against the strategy priorities of the RBC Climate Blueprint</li> </ul>

#### **Executive compensation**

The design of CEO and Group Executive compensation incorporates ESG considerations in the short-, medium- and long-term programs to incentivize our business leaders in advancing positive change, progress towards our objectives, and create long-term sustainable value for our shareholders.

Bank's short-term incentive (STI) program for the CEO and GE includes individual performance objectives tied to Bank's financial performance, client outcomes and contribution to our risk and strategic objectives, including environmental sustainability, and social and governance practices. The STI program for the CEO and GE includes a 30% weighting for risk and strategic objectives, which includes performance objectives related to environmental sustainability, and social and governance practices. This is highlighted on 2024 Proxy Circular. Objectives and results related to environmental sustainability, and social and governance practices are discussed on 2024 Proxy Circular.

Recognizing that climate change is an increasingly important consideration for shareholders and other stakeholders, new for 2023, the CEO and GE mid-term incentive (MTI) and long-term incentive (LTI) programs include a medium-term climate-based objective related to progress made towards the strategic priorities of the RBC Climate Blueprint.

This climate-focused assessment provides an additional incentive for the CEO and GE to accelerate Bank's progress towards these priorities and enables the Board to recognize their efforts by applying a modifier to MTI and LTI awards, taking into consideration their actions supporting our climate strategy.

The Board recognizes that managing climate risks and opportunities is multi-faceted, and that Bank has taken measures to continue momentum on its climate journey. After reflecting on Bank's commitments, actions taken to date, and relative performance compared to peers, the Board has assessed Bank's in-year progress against medium-term climate commitments to be on track, and no further modifier was applied to the 2023 MTI and LTI awards granted.

### 2. Strategy

#### TCFD CLIMATE-RELATED RECOMMENDED DISCLOSURES

Elements	TCFD climate-related recommended disclosures	Supplemental guidance for sub- industry <sup>47</sup>
Impacts, risks and key o	oportunities and linkages to business	strategy and model
Description of material climate-related risks and opportunities over short-, medium- and long-term horizon, and their link to planning horizon in strategy development	<ul> <li>Methods for identifying risks and opportunities for businesses (qualitative)</li> <li>Reference of industry recognized frameworks or models for identifying risks and opportunities and a discussion of why the framework(s) is selected</li> <li>Describe climate-related risks and opportunities by business segment or geographical region</li> </ul>	describe significant concentrations of credit exposure to carbon-related assets     consider disclosing their climate-related risks (transition and physical) in their lending and other financial intermediary business activities.

### Effects of climaterelated impacts, risks and opportunities on strategy and decision making Impact on business model and value chain, strategy and

- chain, strategy and decision-making, financial position, financial performance and cash flow

  Report key information on the organisation's
- transition plan to meet its commitments to greenhouse reduce gas emissions (if any) and/or respond to significant climate impacts, risks and opportunities, towards a low-carbon economy.

## TCFD climate-related recommended disclosures

Financial institutions consider disclosing information on the impact of the risks and opportunities given above, including:

- Operational footprint level impact
  - GHG emissions
  - Use of renewable energy
    - Employee level impact
- Business segment (or productlevel) exposure:
  - Financing
  - Revenue
  - Balance sheet (e.g., assets tangible/intangible, liabilities)
  - % of total portfolio, % by sector
  - \$ of capital commitments
  - \$ of carbon-related exposures and methodology
- In alignment to the Sectoral Decarbonization Approach, firms perform enhanced financial analysis at the asset level across business segments:
  - \$ and % of green and brown financing by sector
  - \$ and # amount of green bonds issued and general description linked to firm's strategy
  - \$ of risk weighted assets (RWAs) by sector and/or portfolio
  - \$ and % of financed emissions and methodology by sector and/or portfolio
  - \$ and % of assets under management (AUM) and ESG funds
  - \$ and # of renewable energy transactions reviewed/approved

#### Supplemental guidance for subindustry<sup>47</sup>

#### Insurance

Insurance companies should describe the potential impacts of climate-related risks and opportunities, as well as provide supporting quantitative information where available, on their core businesses, products, and services, including:

- information at the business division, sector, or geography levels
- how the potential impacts influence client, cedent, or broker selection
- whether specific climate-related products or competencies are under development, such as insurance of green infrastructure, specialty climate-related risk advisory services, and climaterelated client engagement.

#### Asset Management

- describe how climate-related risks and opportunities are factored into relevant products or investment strategies.
- describe how each product or investment strategy might be affected by the transition to a lowercarbon economy.

#### Resilience of the strategy to climaterelated risks

#### Organisation should describe the resilience of its strategy and business model(s) in relation to climate change, including:

#### Scenario Analysis:

- Scenario
  - 3+ types of scenarios (e.g., 1.5°C, 2°C)
  - Description of scenario (e.g., in-house vs. industry collaboration, vendor)
  - Source of scenario
  - High-level outcome by scenario

#### Insurance

- Insurance companies that perform climate-related scenario analysis on their underwriting activities should provide the following information:
  - description of the climaterelated scenarios used, including the critical input parameters, assumptions

#### TCFD climate-related recommended Supplemental guidance for sub-**Elements** disclosures industry<sup>47</sup> and considerations, and (a) the scope of the Variables analytical choices. Explanation on alignment In resilience addition to 2°C а with existing or in-flight analysis scenario, insurance (b) how the resilience regulatory initiatives companies with analysis has been | • Assumptions and methodology substantial exposure to conducted, Depiction of key scenario weather-related perils including the use assumptions should consider using a of climate greater than 2°C scenario Depiction of to account for physical scenario analysis segmentation effects of climate change (c) the results of the methodology used resilience across business time frames used for the segments analysis including climate-related including the results from 4°C investment scenario scenarios, short-, medium-, and the use analysis of long-term milestones scenario Disruptive non-linear analysis.. scenarios and correlation Asset owner of climate risk variables Asset owners that perform scenario (i.e., physical and analysis should consider providing risks) transition to macroeconomic a discussion of how climate-related scenarios are used, such as to variables inform investments in specific Result assets. Firm-specific overlays, limitations or adjustments Exposure by sector geography and/or year-end by defined time horizons (short, medium, long) Resilience strategies with climate risks, opportunities and impacts Definition of operational resilience strategy Outcomes of climate-based stress test scenarios and high-level details of performance under scenarios Summary of scenario analysis results in the context of financial commitments and recent year progress Description of resiliency business model and strategic decisions occurred over the past 12 months Detail of considerations client/customer resilience through stress test scenarios Detail on communities operation's performance through stress test scenarios Firm-specific description on sector resilience through stress test scenarios and how the firm is responding

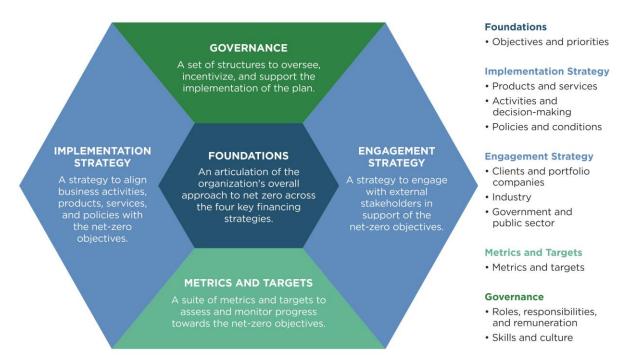
Elements	TCFD climate-related recommended disclosures	Supplemental industry <sup>47</sup>	guidance	for	sub-
	Investment/lending portfolio (or asset level) performance under selected scenarios.				

## GUIDANCE ON DEVELOPING CLIMATE-RELATED STRATEGY DISCLOSURES FOR FINANCIAL INSTITUTIONS

#### i. Net-zero Transition plan

The net-zero transition plan will concretize the implementation of strategic priorities, along with methods for monitoring and effectively managing the plan. GFANZ has introduced a recommended Net-Zero Transition Plan framework for financial institutions, comprising five themes with ten components as follows:

Figure 7: Components of a financial institution's net-zero transition plan. Source: GFANZ<sup>48</sup>



Organizations can refer to the detailed implementation guidance for each component in the GFANZ Report in the Transition Plan towards net zero emissions.<sup>49</sup>

In addition, financial institutions can refer to specific implementation initiatives to transform towards zero at:

- For Insurance companies: Transition Plan Taskforce's (TPT) Net Zero Transition Guide Overview <a href="https://www.ifrs.org/content/dam/ifrs/knowledge-hub/resources/tpt/sector-summary-apr-2024.pdf">https://www.ifrs.org/content/dam/ifrs/knowledge-hub/resources/tpt/sector-summary-apr-2024.pdf</a>
   Insurance Industry
- For Banks: Transition Plan Taskforce (TPT) Net Zero Transition Guide for Banks: <a href="https://itpn.global/banks-sector-guidance/">https://itpn.global/banks-sector-guidance/</a>
- For Asset Managers: Transition Plan Taskforce (TPT) net zero transition guide <a href="https://itpn.global/asset-managers-sector-guidance/">https://itpn.global/asset-managers-sector-guidance/</a>
- For Asset Owner: Transition Plan Taskforce (TPT) net zero transition guide <a href="https://itpn.global/asset-owners-sector-guidance/">https://itpn.global/asset-owners-sector-guidance/</a>

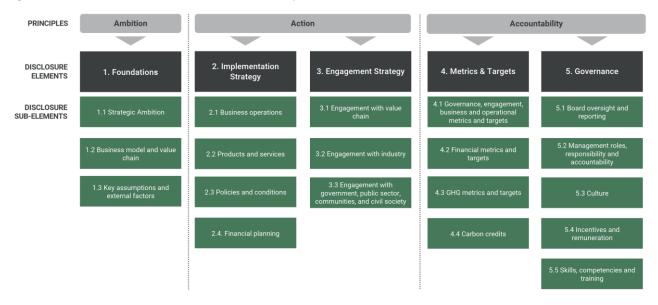
Disclosure of information on the transition plan towards net zero emissions

On the basis of 05 themes of the Net Zero Transition Plan proposed by GFANZ (as mentioned in Figure 7 7 above), the Transition Plan Taskforce (TPT) has issued a Disclosure Framework for net-zero transition plans for financial institutions as follows:<sup>50</sup>

- 1. Foundations: An entity shall disclose the Strategic Ambition of its plan. This shall comprise the entity's objectives and priorities for responding and contributing to the transition towards a low GHG emissions, climate-resilient economy, and set out whether and how the entity is pursuing these objectives and priorities in a manner that captures opportunities, avoids adverse impacts for stakeholders and society, and safeguards the natural environment. Under this element, an entity should also disclose the high-level implications that this transition plan will have on its business model and value chain, as well as the key assumptions and external factors on which the plan depends.
- 2. Implementation Strategy: An entity shall disclose the actions it is taking within its business operations, products and services, and policies and conditions to achieve its Strategic Ambition, as well as the resulting implications for its financial position, financial performance, and cash flows.
- 3. Engagement strategy: An entity shall disclose how it is engaging with its value chain, industry peers, government, public sector, communities, and civil society in order to achieve its Strategic Ambition.
- 4. Metrics and targets: An entity shall disclose the metrics and targes that it is using to drive and monitor progress towards its Strategic Ambition.
- 5. Governance: An entity shall disclose how it is embedding its transition plan within its governance structures and organisational arrangements in order to achieve the Strategic Ambition of its transition plan.

TPT's information disclosure framework divides these 5 themes into 19 sub-elements with detailed disclosure recommendations – figure below. Financial institutions can refer to the detailed information disclosure guidelines in the TPT's guidance document at: <a href="https://www.ifrs.org/content/dam/ifrs/knowledge-hub/resources/tpt/disclosure-framework-oct-2023.pdf">https://www.ifrs.org/content/dam/ifrs/knowledge-hub/resources/tpt/disclosure-framework-oct-2023.pdf</a>

Figure 8: TPT's Disclosure framework for net-zero transition plan



#### ii. Scenario analysis

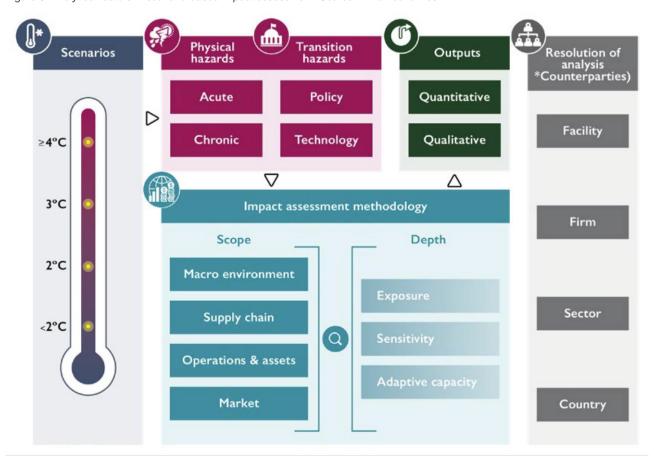
The TCFD recommends that financial institutions conduct a forward-looking scenario-based assessment of climate-related risks and opportunities to ensure that financial institutions incorporate the long-term impacts of climate change into their strategic decisions. For investors, who act both as users and disclosers of climate-related information, conducting climate risk analysis is of significant importance. Holding large investment portfolios, most investment institutions face cross-sectoral risks across multiple geographic regions and financial instruments, while also serving as capital providers for economic development over a long-term horizon. However, assessing climate-related risks for investment institutions can be particularly challenging due to the scale and diversity of their portfolios.

TCFD recommends that organizations use multiple scenarios to account for a range of assumptions about uncertain future outcomes. The scenarios selected will depend on the scope and objectives of the analysis. Specifically, organizations should use scenarios representing different warming pathways, which may include

1.5°C, 2°C, 3°C, or 4°C scenarios across various timeframes. Each warming pathway can be associated with a set of different transition trajectories. By exploring and studying multiple future scenarios and transition pathways, organizations can gain a better understanding of the range of possible outcomes and thereby develop the most effective strategies.

When developing scenarios, financial institutions should use science-based scenarios grounded in global climate models, which currently include those from the Network for Greening the Financial System (NGFS), the International Energy Agency (IEA), and the Intergovernmental Panel on Climate Change (IPCC). NGFS scenarios can be used to conduct initial scenario analysis.

Figure 9: Analytical factors in scenario-based impact assessment. Source: Vivid Economics



Financial institutions can learn more about how to conduct a scenario analysis assessment through the following documents:

- TCFD, 2017 Technical Supplement, The Use of Scenario Analysis in Disclosure of Climate-Related Risks and Opportunities - https://assets.bbhub.io/company/sites/60/2020/10/FINAL-TCFD-Technical-Supplement-062917.pdf
- UNEP FI, Extending our Horizons: Assessing Credit Risk and Opportunities in a Changing Climate (Part 1: Transition-related risks and opportunities): https://www.unepfi.org/industries/banking/extending-our-horizons/
- UNEP FI, Navigating a New Climate: Assessing Credit Risk and Opportunities in a Changing Climate (Part 2: Physical-related risks and opportunities): https://www.unepfi.org/industries/banking/navigating-a-new-climate-assessing-credit-risk-and-opportunity-in-a-changing-climate/
- UNEP FI, Charting a New Climate: State-of-the-art tools and data for banks to assess credit risks and opportunities from physical climate change impacts https://www.unepfi.org/industries/banking/charting-anew-climate/
- UNEP FI, The Climate Risk Landscape: Mapping Climate-related Financial Risk Assessment Methodologies: https://www.unepfi.org/themes/climate-change/the-climate-risk-landscape/
- UNEP FI, Pathways to Paris: A Practical Guide to Climate Transition Scenarios for Financial Professionals: https://www.unepfi.org/industries/banking/pathways-to-paris/

- UNEP FI, Decarbonisation and Disruption: Understanding the Financial Risks of a Disorderly Transition using Climate Scenarios https://www.unepfi.org/industries/banking/decarbonisation-and-disruption/
- UNEP FI, Changing course, A comprehensive investor guide to scenario-based methods for climate risk assessment, in response to the TCFD https://www.unepfi.org/industries/investment/changing-course-acomprehensive-investor-guide-to-scenario-based-methods-for-climate-risk-assessment-in-response-tothe-tcfd

Example 9: Climate-related Disclosure - Strategy

The business strategy of a financial group from South Korea and the relevant key impacts, opportunities and risks<sup>51</sup>

Description of material climate-related risks and opportunities over short-, medium- and long-term horizon, and their link to planning horizon in strategy development

Group recognizes sustainability-related risks in line with its investment and operational cycles. Short-term risks are defined as "risks that may arise within a one-year period," mid-term as "risks that may arise within a period of 2 to 5 (or less than 6) years," and long-term as "risks that may arise over a period of more than 6 years. "Short-term risks mainly encompass sustainability-related risks for investment positions that may be rapidly liquidated within a one-year period. Mid-term risks pertain to sustainability-related risks affecting investment assets like real estate and power projects which span several years, whereas long-term risks involve strategic assets and equity investments essential for ongoing operations under the going concern premise, extending over six years.

Short-term opportunities are defined as "opportunities that may arise within a one-year period," mid-term as "opportunity factors that may arise within a period of three to five years," and long-term as "opportunity factors that may arise over a period of six years or more." Group sustainability-related opportunities in line with its investment and operational cycles. The Company categorizes short-term opportunities as those sustainability-related opportunities rapidly capitalized on through management and investment within the year. Mid-term opportunity factors encompass sustainability-related opportunity factors in real estate and renewable energy project financing that require a defined duration among investment assets for a period of 3 years or more, while long-term opportunity factors are associated with strategic assets and equity investments critical for the Company's ongoing operations extending beyond six years.

#### Analysis of critical risks and opportunities

Category	Risks	Potential financial impact	Viewpoint
	Acute (Floods, Typhoons, Wildfires, etc.)	Decrease in fee income caused by damage to Mirae Asset Securities' business sites and the corporate value of clients	Short-term
Physical Risks	Chronic (Rising Sea Levels, Average Temperature Increase, etc.)	Property value depreciation and decline resulting in lower cash flows, delayed fund recovery, and ultimately a reduction in fee income Decrease in operating profits and increase in the allowance for bad debts resulting from the devaluation of products under operation Decline in revenue arising from extensive data loss due to damage to major infrastructure facilities (data centers and office buildings), along with temporary interruptions in customer service	Long-term
	Policy and Legal	Rising REC purchase prices or renewable energy PPA prices for GHG reduction lead to increased costs Increased expenses for legal actions filed by clients and investors for greenwashing and associated issues Additional costs incurred due to various regulations such as the Inflation Reduction Act (IRA), Carbon Border Adjustment Mechanism (CBAM), Uyghur Forced Labor Prevention Act (UFLPA), and NDC targets set by the Paris Climate Agreement Weakened industrial competitiveness and restricted new investments due to high-carbon industry regulations Increased costs from the introduction of new disclosure systems (ISSB, EU/K-Taxonomy, etc.).	Mid- to long-term
Transition Risks	Reputation	Unsatisfactory measures against climate change and insufficient disclosure of information causing a decrease in demand for products and services due to diminished brand value     Expenses incurred from changes brought by the implementation of eco-friendly strategies and initiatives	Short-term
	E Technology	<ul> <li>Increased expenses attributed to the development of new technologies, R&amp;D, and infrastructure investments during the transition to an eco-friendly and low-carbon economy to achieve carbon neutrality</li> <li>Increased financial burdens from investment failures in new facilities, infrastructure, services, and depreciation of replaced (existing) assets</li> </ul>	Mid- to long-term
	Market (Portfolio)	Increased earnings volatility caused by the adoption of diverse carbon markets (voluntary/regulatory carbon emissions trading)     Heightened volatility in the energy supply market and raw material prices     Changes in asset value as a consequence of the contraction and extinction of high-carbon footprint product markets	Mid- to long-term

ре	Opportunities	Potential financial impact	Viewpoint
Resource Efficiency	Expansion of eco-friendly transportation and infrastructure  Efficiency maximization of energy use, waste management, and water resources  Reorganization of supply chains based on a circular economy	Increased demand for funds to promote the establishment of eco-friendly transportation and infrastructure, energy efficiency maximization, and productivity enhancement     Increased demand for project funds due to supply chain reorganization and transition to a circular economy system	Long-term
Energy	Increased use of low-carbon (renewable) energy     Further developments of technologies for securing energy sources such as carbon capture technology	Increased demand for funds from renewable energy developers (solar, wind), energy capture, and low emission intensity technology developers	Mid- to long-terr
Products and Services	Expansion of ESG financial product development and increased demand     Expansion of eco-friendly product and service businesses	Monetization through the discovery of financial products related to climate change themes such as secondary batteries, eco-friendly, Green New Deal, and Clean-Tech     Increased demand for funds to operate eco-friendly businesses	Short-term, Mid-term
Market	Entry into new markets such as voluntary carbon credits     Increased importance of liquidity provision in emerging markets	Increased demand for investments in climate change response, ecosystem and biodiversity protection, and eco-friendly projects     Monetization of liquidity provision through entry into voluntary carbon credit and GHG reduction markets, and support for investments in eco-friendly projects	Short-term, Mid-term, Long-term
Resilience	Increased demand for the establishment of long-term climate change response systems (net-zero roadmap, etc.)	Rapid increase in financing solution provision opportunities through collaboration with various stakeholders, including the expansion of renewable energy supply and the enhancement of energy management systems	Mid- to long-terr

#### Strategy resilience and resilience to climate-related risks

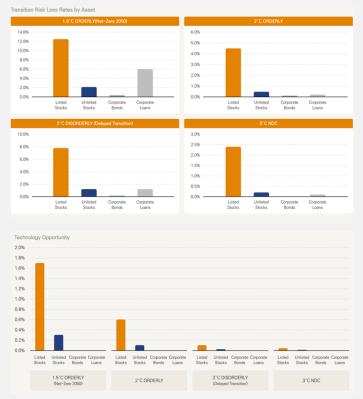
As a result of the scenario analysis focusing on transition risks and opportunities, Company calculated the potential losses for listed stocks, unlisted stocks, corporate bonds, and corporate loans, which totalled KRW 2.56 trillion at the end of 2023, using five scenarios provided by NGFS. \*\*

\*\*Under the scenario designed to limit temperature increases to 1.5°C (1.5°C Orderly), the highest estimated transition risk loss was around KRW 12.7 billion.

In contrast, the estimated loss for the 3°C NDC scenario, which maintains emission at 2030 emission level, was around KRW 1.6 billion.

• The 3°C current policies scenario has zero transition costs as it was predicated on the assumption that there would be no transition risk due to the continuation of existing climate policies. \*\*





Under its "Climate Engagement" strategy, one of three long-term ESG strategies, Company has prioritized expanding green, low-carbon finance, shifting to renewable energy, and managing the carbon emissions of its investment assets. The Company has developed three specific climate transition plans to tackle sustainability-related risks and opportunities.

#### RE100-Based Action Plan

- Mirae Asset Securities declared its commitment to the RE100 initiative in 2021, aiming to achieve its goals by 2025.
- By concluding VPPA agreements and long-term REC purchase agreements, 48% conversion rate(based on contracts opened) is achieved
- Since this action plan assumes undisrupted supply of renewable energy in relation to VPPA and REC purchase agreements in Korea, "Green premium" purchases are considered as a contingency plan.

#### Action Plan Based on a KRW 45 Trillion Sustainable Finance Goal

- By the end of 2023, Mirae Asset Securities had achieved KRW 34.4 trillion, progressing towards a sustainable finance goal of KRW 45 trillion by 2025.
- Sustainable finance investment and operations are being promoted by including sustainable management in the management and organizational performance KPIs, providing incentives, and operating dedicated organizations and committees.

#### Action Plan Based on Internal GHG Emission and Financed Emission Reduction Targets

- In 2022, Mirae Asset Securities set science based reduction targets for internal and financed emissions, verified by SBTi.
- The plan targets annual linear reductions of 5.3% and 5.8% for internal emissions, with unit reductions for financed emissions calculated using the SDA and temperature rating methodologies.
- Investments in high-carbon and carbon-intensive industries are slated to decrease gradually, guided by the investment exclusion and cautionary areas clauses in the Environmental and Social Policy Statement (ESP) and the implementation of Environmental Social Risk (ESR).

#### Classification Strategy and Decision-Making Direction · The risk management team continuously manages commercial real estate assets, ex-post, examining the strategic measure to incorporate the disaster risk levels derived from physical risk analysis into future commercial real estate investment evaluations. Physical Risk · The Company is examining a number of options including the provision of industry-specific sustainability guideline (to be resolved by the ESG Committee for the revision of Environmental and Social Policy Statement) for listed stock investments, which are the most exposed assets within the SSP scenarios. · Analysis of policy risks reveals that regulatory-induced losses in investment assets can differ by up to seven times depending on the scenario. As most of our indirect GHG emissions originate from listed stocks, Mirae Asset Securities is restricting investments in high-carbon and carbon-intensive listed stocks and verifying the GHG reduction commitments of the companies we invest in as part of our Policy and Legal adaptation strategy. Policy risk scenario analyses assume a long-term increase in energy and carbon credit prices. As a result, Mirae Asset Securities considers expanding renewable energy financing and trading of carbon credits as strategic directions to minimize future losses and mitigate risks. · As the mandatory climate-related disclosure for investors and other stakeholders becomes a prominent aspect of policy risk, Mirae Asset Securities has established a dedicated sustainability Reputation Transition Risks and organization and integrated sustainability metrics into management KPIs, thereby incorporating ESG Opportunities management strategies. · Scenario analysis on technology opportunities indicates that similar to the result of the risk analysis, opportunities derived from listed stocks is higher than those from other assets. Consequently, Mirae Asset Securities is considering to increase investments in companies holding patents for low-carbon technologies such as renewable energy systems and energy-saving solutions, maximizing Technology/ technological opportunities and building a low carbon portfolio as an adaptation strategy Resource Efficiency/ Products and · Mirae Asset Securities also considers selling ESG and low-carbon funds through its wealth Services management business as a business-related opportunity and risk adaptation strategy. Based on the scenario analysis results of technological opportunities, investments in (un)listed companies with growing green revenues may lead to an opportunity to generate additional profits, which Mirae Asset Securities perceives as part of its adaptation strategy.

### 3. Risk Management

#### TCFD CLIMATE-RELATED RECOMMENDED DISCLOSURES

### TCFD climate-related recommended disclosures

#### Supplemental guidance for subindustry<sup>52</sup>

Description of the extent to which, and how, the processes for managing climate-related risks and opportunities are integrated into the organisation's overall risk management process

Describe the organization's processes for identifying and assessing climate-related risks.

- Description of general risk management function and level of integration into business-as-usual capabilities (e.g., risk ID, risk taxonomy, risk inventory, credit rating, underwriting standards, PD/LGD, risk appetite/limits) at a sector level
- Description of internal tools and technology and external vendors
- Reference to industry recognized frameworks for identifying risks and explanation of why your firm selected them
- Description of internal taxonomy classification using recognized framework to apply "brown to green" scale by business segment
- Discussion of the linkage between risk identification processes and the creation of limits and any other methods used to control risk within the portfolio
- Exposure (\$/%) and quantification of risk types by business segment and jurisdiction
- Description of impacted risk management process and controls, including a description of improvements planned/completed to enhance capabilities and incorporate climate-change risk into existing risk management framework
- Commitments to future state capabilities
- Carbon measurement methodology and process to evaluate portfolio carbon and portfolio decarbonization pathways
- Details of training and employee readiness planning and programs

#### **Bank**

 Banks should consider characterizing their climate-related risks in the context of traditional banking industry risk categories such as credit risk, market risk, liquidity risk, and operational risk. Banks should also consider describing any risk classification frameworks used (e.g., the Enhanced Disclosure Task Force's framework for defining "Top and Emerging Risks").

#### Insurance Company

- Insurance companies should describe the processes for identifying and assessing climate-related risks on re-/insurance portfolios by geography, business division, or product segments, including the following risks: physical risks from changing frequencies and intensities of weather-related perils, transition risks resulting from a reduction in insurable interest due to a decline in value, changing energy costs, or implementation of carbon regulation, and liability risks that could intensify due to a possible increase in litigation.
- Insurance companies should describe key tools or instruments, such as risk models, used to manage climate-related risks in relation to product development and pricing. Insurance companies should also describe the range of climate-related events considered and how the risks generated by the rising propensity and severity of such events are managed.

#### **Asset owner**

- Asset owners should describe, where appropriate, engagement activity with investee companies to encourage better disclosure and practices related to climaterelated risks to improve data availability and asset owners' ability to assess climate-related risks.
- Asset owners should describe how they consider the positioning of their total portfolio with respect to the transition to a lower-carbon energy supply, production, and use. This could include explaining how asset owners actively manage their portfolios' positioning in relation to this transition.

#### Asset Manager

 Asset managers should describe, where appropriate, engagement activity with investee companies to encourage better disclosure and practices related to climaterelated risks in order to improve data

Elements	TCFD climate-related recommended disclosures	Supplemental guidance for sub- industry <sup>52</sup>
		availability and asset managers' ability to assess climate-related risks.
		Asset managers should also describe how they identify and assess material climate- related risks for each product or investment strategy. This might include a description of the resources and tools used in the process.
		Asset managers should describe how they manage material climate-related risks for each product or investment strategy.
Describe how processes for identifying, assessing, and managing climaterelated risks are integrated into the	Description of roles and responsibilities of different risk functions and their role in how they manage risks (systems, processes, reporting)	
organization's overall risk	KPIs/KRIs by business segment	
management.	Business-segment specific description of enhancements to existing processes (e.g., underwriting, no. of transactions approved, attestation)	
	Improvements made to embed physical and transition risks into existing risk management capabilities	
	Description of additional risk mitigation measures (e.g., new exclusion policies, updated risk appetite statements, new lending targets or limits)	
	Management of reputation risk through position statements on climate-related issues, leveraging support of external stakeholders and NGOs	
	Policies that restrict or divest from exposures in high-risk sectors, which is in line with the 2° or below scenario	
	Environmental risk assessments conducted for new transactions and newly onboarded borrowers	
	Commitments to supporting clients through mitigation of physical and transition risks, as part of a broader underwriting strategy	

# GUIDANCE ON DEVELOPING CLIMATE-RELATED RISK MANAGEMENT DISCLOSURES FOR FINANCIAL INSTITUTIONS

Integrating climate considerations into the existing risk management framework of financial institutions will support the achievement of business objectives in the organization's strategy and operations in general and ESG in particular. To better manage sustainability-related risks and achieve the SDGs, financial institutions should adopt the following structured risk framework to integrate sustainability considerations into existing risk management practices and improve their ability to respond to development regulations unshakeable. For more information, please refer to the General Handbook – Part 2, section 2.2.2.

Figure 10: Risk management for financial institutions. Source: EY and EBRD Synthesis<sup>53</sup>.

Risk inventory	Risk assessments	Risk mitigation and controls	Metrics and reporting
Identification of sustainability-related risks and incorporation into existing risk management frameworks	Understanding the potential impacts and materiality of sustainability-related risks	Definition of appropriate risk responses and stand- up commensurate processes and controls	Development of quantitative measures for sustainability-related risks and commitments
<ul> <li>Use climate projections to detect physical hazards over relevant time horizons</li> <li>Develop a method to flag potential transition risks</li> <li>Identify climate-related financing opportunities</li> </ul>	<ul> <li>Review identified physical and transition risks for financial impact and materiality</li> <li>Categorise climate risks based on vulnerability and exposure</li> <li>Assess clients' risks for financial solution opportunities</li> </ul>	<ul> <li>Consider various risk management options based on financial analysis</li> <li>Work with clients on when/how to mitigate, transfer, accept and/or control identified risk</li> </ul>	Provide relevant, material information to capital markets on climate risks
	Internal risk management		Disclosure

#### a. Climate-related risk inventory

Climate risks for financial institutions are financial impacts caused by climate change to their client base. The majority of a financial institution's climate risks lie within its lending portfolio, where there is a risk of sudden changes in customer cash flow due to climate-related events. Financial institutions may also face climate risks in their traded securities portfolios, including bonds — with the risk of significant changes in asset values due to fluctuations in revenue, expected expenses, and the value of capital assets. Climate risks can be categorized into two types: transition risks and physical risks.

#### i. Special characteristics of climate-related risks

When integrating climate risks into existing risk management processes, the risk management function of organizations should pay attention to the specific characteristics and complex variables of climate change. Specifically, the impacts of climate change vary by scale and geographic location, and evolve over time due to its long-term nature. Accordingly, the risk management function should review and adjust existing risk processes and policies to ensure these characteristics of climate risks are comprehensively considered.

The table below provides some important characteristics of climate-related risks.

Table 5: Characteristics of climate-related risks. Source: Compiled from TCFD<sup>54</sup>

Characteristics of climate-related risks	Impact on risk management processes
Impact varies by geography and business environment	The impacts of climate change and climate-related risks vary depending on geographic region and scale — whether national, regional, or global. They also differ based on business operations, types of products and services, markets served, operating locations, and the scope of the value chain. Therefore, risk management processes must be capable of addressing risks that manifest across different locations and scales, tailored to the specific circumstances of each organization. Organizations may also establish criteria within their risk policies to identify specific business areas that are more vulnerable to transition risks and/or physical risks.
Impact varies by time frame	Climate-related risks can exist and evolve over a period of time beyond traditional business planning and investment cycles. Risk management processes may need to be adapted to account for short, medium- and long-term timeframes to adequately address the impacts of climate change.

Characteristics of climate-related risks	Impact on risk management processes
Peculiarities and uncertainties	Climate change is an ever-changing and uncertain phenomenon with limited historical data, which in turn limits the ability to apply statistical and trends analysis. In addition, the impact of mitigation measures is also complex due to unpredictable fluctuations in new technology developments, government policies, and consumer behaviours and needs. When considering future uncertainties, organizations should use scenario analysis to consider the impact of risks under different future conditions.
Non-linear changes	As noted above, climate-related risks can manifest at different scales over time, with increasing severity and scope of impact. Climate phenomena reaching thresholds may trigger major, long-term, sudden, and irreversible changes. In addition, abrupt natural climate events can lead to sudden policy changes and disruptions. Understanding the sensitivity of thresholds within the natural climate system, as well as within ecosystems and societies, is essential for comprehending climate-related risks. The risk function should explore the non-linear changes of climate change and incorporate them into risk assessments
Systemic, complex, and widespread impacts	Climate-related risks are interconnected through socio-economic and financial systems, due to chain effects and systemic impacts. Climate-related risks can have direct impacts, but they also have indirect impacts that require the risk management process to adopt a multidimensional perspective to assess the impact on the organization in the short, medium and long term.

#### ii. Identification of climate-related risks

TCFD requires financial institutions to identify key climate-related risks and opportunities, as well as the potential financial impacts these may bring. Accordingly, financial institutions need to assess the effects of climate change and the decarbonization process within the context of their business operations and the businesses in their portfolios — including geographic context, industry regulations, historical climate-related trends, and current scientific evidence on future climate impacts. TCFD classifies climate-related risks into two main categories (physical risks and transition risks), which are further broken down into subcategories (see table below). Organizations can use these classifications to identify material risks and consider the approaches outlined in the table below as a starting point.

Table 6: Classification of climate-related risks and examples (non-exhaustive). Source: TCFD

Risk Type	Description	Examples of risks
Transition risk  Arise from the shift toward a low-carbon economy. These risks may result from changes in policy, legislation, technology, and markets. Depending on the nature, speed, and focus of these changes,	Policy and legal risks  Risks related to policies aimed at limiting actions contributing to climate change. For example, carbon pricing mechanisms may increase operating costs. Legal risks may also arise from litigation against organizations that fail to manage or mitigate their climate impact.	<ul> <li>Increased pricing of GHG emissions and emissions-reporting obligations</li> <li>Mandates on and regulation of xisting products and services</li> <li>Exposure to litigation</li> </ul>
they may lead to varying degrees of financial and reputational risks.	Technology risks  Technological advances are critical to meeting global climate goals and enabling the transition to a low-carbon economy. The pace of development and the introduction of new technologies can have a detrimental impact on organizations.	<ul> <li>Substitution of existing products and services with lower emissions options</li> <li>Unsuccessful investment in new technologies</li> <li>Costs to transition to lower emissions technology</li> </ul>

Risk Type	Description	Examples of risks
	Market risk  Markets may be affected by climate change in various ways, including shifts in supply and demand for certain goods, products, and services.	<ul> <li>Changing customer behavior</li> <li>Uncertainty in market signals</li> <li>Increased cost of raw materials</li> </ul>
	Reputational risk  Changes in customer perception may lead to reputational risks, especially regarding policies and actions that either support or hinder the transition to a low-carbon economy.	<ul> <li>Shifts in consumer preferences</li> <li>Stigmatization of sector</li> <li>Increased stakeholder concern or negative stakeholder feedback</li> </ul>
Physical Risks  Result from changes in weather patterns and long-term climate conditions. These can be acute (event-driven) or	Acute risk  Refer to risks caused by specific events, such as extreme weather events like cyclones, storms, or floods. These are often seasonal and may increase in severity and frequency due to atmospheric changes.	Increased everity of extreme weather events such as cyclones and floods
chronic (long-term), potentially causing financial impacts through direct asset damage or supply chain disruptions.	Chronic risk  Refer to long-term changes in climate patterns due to global warming, which may lead to rising sea levels or prolonged heatwaves	<ul> <li>Changes in precipitation patterns and extreme variability in weather patterns</li> <li>Rising mean temperatures</li> <li>Rising sea levels</li> </ul>

Table 7: How to identify climate-related risks. Source: TCFD

Risk Classification	Points to consider when determining climate-related risks
Transition risk	
Policy and legal risks	<ul> <li>National climate targets in the countries in which the organization operates and invests</li> </ul>
	<ul> <li>Current or anticipated regulatory policies in the countries where the organization operates</li> </ul>
	<ul> <li>Risk of carbon pricing across different regions where the organization operates, and expected changes in these risks in the future</li> </ul>
	Risk of legal litigation — either directly or indirectly through the lending portfolio
Technology risks	<ul> <li>Risks related to anticipated technological changes, especially through capital investment activities</li> </ul>
	<ul> <li>Impacts on the organization's investment portfolio due to the cost competitiveness of current coal-based technologies compared to emerging renewable technologies</li> </ul>
	<ul> <li>Investment sectors of the organization may be disrupted by the development of low- carbon technologies, such as in transportation and agriculture</li> </ul>
Market risk	Alignment of the organization's products and services with international climate change commitments

Risk Classification	Points to consider when determining climate-related risks
	Changes in consumer demand and their impact on the organization's revenue streams
Reputational risk	<ul> <li>The organization's communication approach regarding current and planned climate actions</li> <li>The structure of the investment portfolio by sector and the risk of opposition within those sectors</li> </ul>
Physical Risks	
Acute risk Chronic risk	<ul> <li>Geographic distribution of the investment portfolio and the risk of physical climate impacts at those locations</li> <li>Impact of these risks on the default risk of the organization's borrowers, and consideration of these impacts in current lending policies</li> </ul>

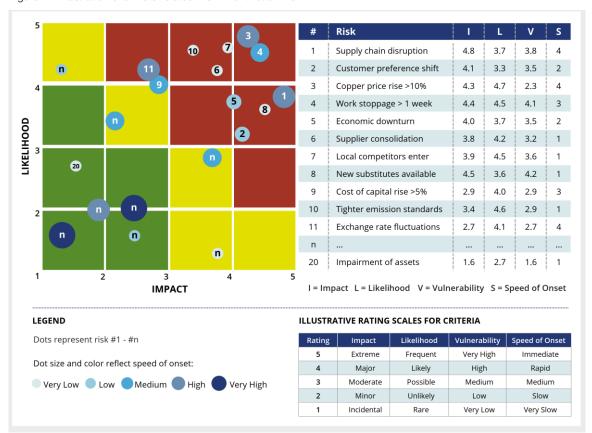
#### b. Climate-related risk assessment - Assessment criterial

Due to the nature of climate-related risks, in addition to the criteria of impact and likelihood, organizations may consider adding risk assessment and prioritization criteria including "vulnerability" and "speed of onset". These value criteria and priority ratings are defined as follows:

- Vulnerability: The degree to which an organization is susceptible to a risk event, based on its level of
  preparedness, agility, and adaptability. Vulnerability is linked to both impact and likelihood the more
  vulnerable an organization is to a risk, the greater the impact if the event occurs. If risk controls are not
  implemented or functioning as designed, the likelihood of the event increases.
- Speed of Onset: The time between when a risk event occurs and when the organization begins to experience its effects. Understanding the speed of onset is useful for developing effective risk response plans.

The figure below provides an illustrative example of how an organization can apply criteria for vulnerability and speed of onset, along with criteria for likelihood and impact, to prioritize risks.

Figure 11: Illustration of climate-related Risk Prioritization Matrix



#### c. Risk mitigation and control

According to the Bank of Russia's recommendations on Climate Risk Management for Financial Institutions,<sup>55</sup> financial institutions should take note of the following points in climate risk mitigation and control:

- implement controls in a timely manner to mitigate the adverse impacts of climate risks and their potential escalation, taking into account their risk appetite and business strategy
- develop policies to manage climate risks, which, taking into account the specifics of certain sectors of the
  economy, may include determining the risk appetite of existing or potential clients, establishing criteria for
  introducing limits on risk concentration or criteria for applying additional conditions for insurance coverage
  and reinsurance, and as well as coordination of climate change mitigation and adaptation measures.
- Climate risk management policies that include restrictions on access to financial services and exclusion criteria from financial services coverage for customers in certain industries (negative screening) should not be used.
- For clients and counterparties who do not manage climate risks appropriately, a financial institution nis
  advised to consider the following measures to reduce risks and mitigate the impact of the realisation of
  climate risks:
  - inclusion in the contract of obligations for clients/counterparties to improve climate risk management practices, indicating specific deadlines and, if applicable, activities, as well as threshold values of indicators that cannot be exceeded or must be achieved
  - reducing loan terms, increasing discounts when valuing assets for financing, reducing limits on financing, investment and insurance
  - review of covenants in financing, investment, insurance and reinsurance agreements.
- Provide assistance to clients and counterparties to encourage them to adopt climate risk management practices and increase resilience to them.
- Consider the risks of greenwashing associated with the possible dissemination by clients and
  counterparties of false, inaccurate or incomplete information about the consideration of climate risks in
  their activities. To do this, own assessment may be conducted or the opinion of third parties may be used.
  Appropriate controls and periodic reviews may be carried out to ensure that the information is up to date.

The extent and methodology of developing risk identification, assessment and measurement capabilities to support our efforts with respect to climate risk management of one of the largest banks in the world <sup>56</sup>

Accordingly, Bank continues to integrate climaterelated matters into our overarching risk management framework.

#### Integration Methodology: Implementing the Climate Risk Management Framework (CRMF)

Our Climate Risk Management Framework (CRMF), developed in 2022, details the governance, roles and responsibilities, and principles that support the identification, measurement, monitoring, controlling and reporting of climate risks. The CRMF was designed to promote a consistent approach to the management of climate risk across Bank.

During 2023, Bank have continued to progress with the implementation of the CRMF. This work involves integrating climate risk into relevant business-as-usual risk management processes across risk programs and categories. One example of this is the incorporation of climate risk assessments as part of annual credit reviews for certain relationships and for sectors with greater exposure to transition and physical risks. In those cases, climate assessment reviews are conducted in conjunction with other traditional due diligence requirements for credit analysis.

The implementation of the CRMF delivers foundational risk management capabilities which will evolve over time as new processes, industry standards and best practices in climate risk management are developed.

#### Related actions and resources: Refining Climate Risk Identification

Through Bank's internal risk identification process, climate risk continues to be designated as a cross-cutting risk that can manifest through existing risks. Climate risk drivers can impact each of the risk categories in our risk taxonomy, for example, strategic, reputation and credit.

As Bank described in last year's report, climate risks can be categorized as the following:

- Transition Risks, which arise from the process of adjusting toward a low-carbon economy and encompass policy, technological changes and shifting consumer/market sentiment and societal preferences; and
- Physical Risks, which arise through "acute" weather-related events such as heatwaves, floods, wildfires and storms as well as "chronic" or long-term shifts in climate patterns, such as rising sea levels, precipitation change, increasing mean temperature and extreme weather variability.

The bank analyzes the potential impacts of climate risk factors on a wide range of key risk categories. Such risks can manifest themselves differently across our risk categories in the short, medium and long term and may be either physical or transition-related climate impacts. The risk portfolio includes:

Operational risks
 Compliance risks
 Reputation risk
 Credit risk
 Market risk
 Liquidity risk
 Strategic risk

(Illustration of the content of the risk impact analysis)

Risk		Climate Drivers			
Category	Definition	Transition Risk	Physical Risk		
Operational	Risk of loss resulting from inadequate or failed internal processes, people and systems, or from external events.	Climate drivers can exacerbate several subcategories of operational risk, such as risk oversight errors (e.g., due to insufficient understanding of the impact of climate change), reporting risk (e.g., due to new voluntary or mandatory reporting requirements), data management risk (e.g., due to fragmented data and solution providers) or model risk (e.g., challenges in validation of complex and non-traditional climate models).	Chronic and acute physical risks can lead to physical damage to property and impact health and safety causing disruptions in normal operations.		
Compliance	Risk to current or projected financial condition and resilience arising from violations of laws, rules or regulations, or from non-conformance with prescribed practices, internal policies and procedures or ethical standards.	Climate drivers can lead to increased regulatory requirements which increase the potential of non-compliance.			
Reputation	Risk to current or projected financial condition and resilience arising from negative public opinion associated with climate change.	Climate drivers can increase reputational risk if Citi is perceived not to be sufficiently progressing or providing sufficient transparency on its climate-related commitments and actions.			

### 4. Metrics and targets

### TCFD CLIMATE-RELATED RECOMMENDED DISCLOSURES

Elements	TCFD climate-related recommended disclosures	Supplemental guidance for sub- industry <sup>57</sup>
Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process	Metrics used to assess the impact of (transition and physical) climate-related risks on their lending and other financial intermediary business activities in the short, medium, and long term, including     Balance sheet — credit exposure, equity and debt holdings, trading positions     %of total portfolio, % by sector     \$ of financing provided and revenue earned over a specified horizon     \$ of capital commitments     Analysis by: industry, geographical area, credit quality, term      Amount and percentage of carbon-related (or climate)	the amount of lending and other financing connected with climate-related opportunities.

Elements	TCFD climate-related recommended disclosures	Supplemental guidance for sub- industry <sup>57</sup>
	sensitive) assets relative to total assets  • Additional risk metrics are outlined in sections 2 and 3 of this document.  Key alignment metrics • Amount of lending and other financing connected with climate-related opportunities.  Common Own Operations metrics • Scope I carbon emissions • Total emissions • Air travel per employee • Energy use • Total electricity consumption • Share of renewable energy • Waste, water, and materials consumption • Real estate footprint • Share of office space in LEED-certified buildings • List of selected metrics and rationale, linked to strategic initiatives tracking progress to-date	Insurance companies should provide aggregated risk exposure to weather-related catastrophes of their property business (i.e., annual aggregated expected losses from weather-related catastrophes) by relevant jurisdiction.
Disclose Scope 1, Scope 2, and if appropriate Scope 3 greenhouse gas emissions, as well as the related risks.	<ul><li>External</li><li>Standards used to calculate Scope 1 and 2 emissions</li></ul>	

Elements	TCFD climate-related recommended disclosures	Supplemental guidance for sub- industry <sup>57</sup>
	<ul> <li>and the verification standard used</li> <li>Materiality assessment and methodology to quantify for Scope II emissions</li> <li>Intensity ratios with unit by total revenue and/or full-time employees as the denominator</li> </ul>	
Describe the targets used by the organization to manage climate-related risks and opportunities, and performance against targets	<ul> <li>Subset of metrics that management has assigned forward-looking targets, which includes metrics</li> <li>Own operations targets</li> <li>Risks/portfolio targets</li> <li>Opportunities — commitment to sustainable financing</li> <li>Common "own" operations targets include: <ul> <li>Greenhouse gases</li> <li>Emissions reduction</li> <li>Decrease in air travel per employee</li> </ul> </li> <li>Energy use</li> <li>Increase in amount of renewable energy used</li> <li>Decrease in electricity consumption</li> <li>Waste</li> <li>Decrease in paper consumption</li> <li>Increase in recycled waste</li> </ul>	
	<ul> <li>Increase in waste diversion from landfill</li> <li>Decrease in water consumption</li> <li>Targets tracked with graphs/tables showing year-over-year progress with accompanying explanation and rational for use of metrics and targets (including those that are removed and/or added)</li> </ul>	

# GUIDANCE ON DEVELOPING CLIMATE-RELATED METRICS AND TARGETS FOR FINANCIAL INSTITUTIONS

Metrics and targets provided by financial institutions offer investors and other stakeholders deeper insights into changes in capital allocation toward high-carbon-emitting sectors. To set science-based targets (SBTi), global financial institution alliances require clear and reliable data on this capital allocation.

Metrics and targets help measure and disclose progress against commitments to manage and mitigate the impacts of climate change. To ensure usefulness, metrics must be clearly interpreted, measured, and reported both internally and externally. At the same time, metrics also help financial institutions assess the efforts needed to continuously improve toward their goal.

#### Example

Example 11: Climate—related Disclosure - Metrics and Targets



### Disclosure of metrics and targets of a major financial group based in Korea<sup>58</sup>

Group has set mid-term (2030) and long-term (2040-2050) reduction target for internal carbon emissions and financed emissions for each industry based on the SBTi-based reduction roadmap and is calculating and disclosing its emissions. In particular, the Group measures financed emissions of each asset, and each industry based on the PCAF guideline and calculates the sovereign debt emissions (Scope 3) and financed emissions arising from transition finance. Group is committed to continuously disclose its efforts to achieve the Zero Carbon Drive strategies and targets while actively communicating with various stakeholders.

KPI under Zero Carbon Drive		Target	year		Base year	Achievement rate	Year of report 2023	
KPI under Zero Cardon Drive	2030	2040	2044	2050	2020	(%)		
Scope 1, 2 emissions(tCO₂eq)	56,150	15,491	0	-	96,811	27.9	69,757 <sup>&gt;</sup>	
Scope 3 Emissions(10,000 tCO <sub>2</sub> eq)	2,905	1,774	1,361	0	4,382	Increased	5,006	
Financed emission intensity (tCO <sub>2</sub> eq/KRW 100 million)	13.7	8.4	6.4	0	20.6	3.0	20	
Cumulative performance of green finance (KRW trillion)	30	-	-	-	2.7	44.3**	13.3	

Publish indicators used by the organization to assess climate-related risks and opportunities in line with the organization's risk management strategy and processes

The Group discloses the amount of capital expenditure and financing for climate-related risks and opportunities

As of December 2023

Amount of capital expenditure related to climate risks and opportunities					
Major risks and opportunities for which capital expenditure is deployed	Status of capital expenditure	Capital expenditure amount (KRW 100 million)			
Measures to secure business continuity in case of disasters caused by climate change, e.g., torrential rain, typhoon, etc.	Introduced cloud system	149.9			
Establishment of cutting-edge facilities for efficient consumption of electricity	Purchased hardware (server/equipment)	656.6			
Regular investment in infrastructure to reduce internal carbon emissions	Purchased LED lightings	13.4			
Introduction of eco-friendly IT products for efficient use of electricity at offices	Purchased eco-friendly products	60.5			
eplacement of decrepit facilities with new ones to better respond to climate change	Replaced decrepit facilities	51.0			
Total		931.3			

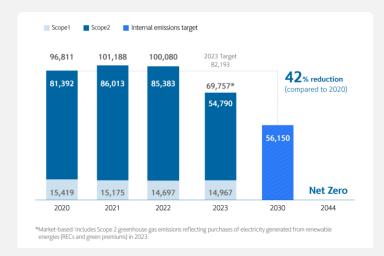
Amount of financing related to climate risks and opportunities						
Major risks and opportunities for which financing is deployed	Status of financing	Financing amount (KRW 100 million)				
Expansion of support (loan/investment) for green finance	Issued green bonds (Shinhan Bank)	1,500				
Total		1,500				

In order to identify the assets that are vulnerable to transition risks and physical risks, Group examined the data on exposure of companies in each industry.

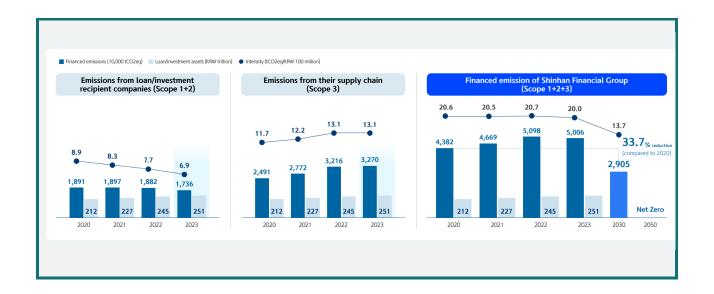
60 or higher 50 or higher 4	0 or higher	0 or higher	20 or higher	10 or higher	Below 10				As of December 2
Industry	Exposure (KRW 100 million)	Exposure ratio	Financed emissions * (tCO <sub>2</sub> eq)	Intensity** (tCO <sub>2</sub> eq/KRW 100 million)	Industry	Exposure (KRW 100 million)	Exposure ratio	Financed emissions * (tCO <sub>2</sub> eq)	Intensit (tCO <sub>2</sub> eq/KRW 100 mil
Manufacture of basic metal	44,547	1.80%	5,825,157	50.7	Manufacture of wood and wood products;	3,716	0.10%	163,947	9
Electricity, gas, steam and air conditioning supply	47,289	1.90%	5,546,210	101.5	except furniture				
Manufacture of chemicals and chemical products; except pharmaceuticals	59,567	2.40%	4,033,631	20.1	Printing and reproduction of recorded media  Business support services	7,387 8.007	0.30%	132,263	4
Manufacture of food products	44,737	1.80%	3.117.655	8.0	Manufacture of leather, luggage and footwear	2,474	0.10%	117,329	
Manufacture of rood products  Manufacture of coke, briquettes and refined petroleum products	19,137	0.80%	2,633,086	45.5	Architectural, engineering and other scientific technical services	10,885	0.40%	109,038	2
Manufacture of other machinery and equipment	62,591	2.50%	2,062,143	3.3	Postal activities and telecommunications	13,954	0.60%	106,343	
Manufacture of motor vehicles and trailers	41,483	1.70%	1,861,861	4.0	Manufacture of beverages	4,308	0.20%	95,477	
Manufacture of fabricated metal products;	38,358	1.50%	1,846,957	7.6	Air transport	2,246	0.10%	85,159	3
except machinery and furniture  Manufacture of electronic components, computer;	72,877	2.90%	1,800,680	8.0	Computer programming, system integration and related activities	5,535	0.20%	83,569	
visual, sounding and communication equipment  Manufacture of non-metallic mineral products	18,004	0.70%	1,711.847	55.8	Maintenance and repair services of personal and household goods	8,179	0.30%	73,724	
Manufacture of rubber and plastic products	31,183	1.20%	1,518,725	7.3	Fishing	1,468	0.10%	66,108	1
Special trade construction	18,380	0.70%	1,390,832	4.8	Production and publishing of video and sound	5,447	0.20%	64,769	
Human health activities	48,265	1.90%	1,368,869	5.1	recording				
Manufacture of electrical equipment	36,580	1.50%	1,355,180	3.5	Agriculture	1,178	0.00%	60,435	
Wholesale trade and commission trade	143,159	5.70%	1,321,485	3.7	Information service activities	4,479	0.20%	46,854	
Manufacture of pulp, paper and paper products	12,789	0.50%	813,292	27.1	Maintenance and repair services of industrial	828	0.00%	37,666	
Land transport and transport via pipelines	23,739	0.90%	690,588	7.7	machinery and equipment				
Waste collection, treatment and disposal activities; materials recovery	10,055	0.40%	668,949	49	Mining of non-metallic minerals; except fuel Research and development	960 2,966	0.00%	33,688 32,111	
Manufacture of apparel, apparel accessories	14.948	0.60%	588.274	6.6	Broadcasting	2,702	0.10%	23,049	
and fur products			,		Sewage, wastewater, human and animal waste	710	0.00%	14,597	
Manufacture of textile; except apparel	13,312	0.50%	576,473	9.2	treatment services				
Water transport	3,498	0.10%	445,433	73.6	Social work	729	0.00%	11,741	
Food and beverage service activities	27,767	1.10%	436,178	2.5	Remediation activities and other waste management services	239	0.00%	8,691	2
Other manufacturing	7,324	0.30%	375,521	9.9	Mining of metal ores	45	0.00%	1,929	
Manufacture of furniture	6,413	0.30%	363,153	10.9	Forestry	86	0.00%	1,929	
Sale of motor vehicles and parts	13,257	0.50%	339,328	6.8	Water supply	46	0.00%	750	
Manufacture of medical, precision and optical instruments, watches and clocks	13,457	0.50%	318,388	3.5	Manufacture of tobacco products	1	0.00%	12	
Manufacture of pharmaceuticals, medicinal chemical and botanical products	11,730	0.50%	286,523	5.7	Activities of households as employers of domestic personnel	0	0.00%	1	
Publishing activities	23.924	1.00%	279.890	3.7	Total exposure to major industries	1,057,988	42.20%	45,635,767	
Education	20,064	0.80%	232,217	3.7	Total assets of Shinhan Financial Group for which financed emissions are calculated	2,507,019	100.00%	50,060,685	
Manufacture of other transport equipment	8,307	0.30%	170,142	2.9		4.047.052			
Accommodation	32,672	1.30%	167,776	2.8	Total assets of Shinhan Financial Group	6,917,953			
The total financed emissions include Scope 1, 2 an	d 3 of the relevant comp	anies in each inv	dustry.		Ratio of exposure related to climate risks (total assets for which financed emissions are calculated) out of the total assets	2,507,019	36%		

### Greenhouse Gas Emissions: Scope 1, Scope 2, and, where appropriate, Scope 3 for greenhouse gas (GHG) emissions

Group measures internal and external GHG emissions every year, making every effort to achieve Net Zero by 2044. The actual emissions by Group are on a constant rise compared to 2020.



Group discloses the 15th category of Scope 3, i.e., "investment" category, which is deemed the most important in Scope 3, as its "Financed Emission". The Group is expanding the scope of financed emissions measurements out of its total assets for the purpose of measuring climate risks. The measured assets in 2023 were KRW 251 trillion, up 20% from KRW 212 trillion of 2020, while the financed emissions increased by 16% over the same period. Under these circumstances, Group has decided that instead of setting a goal of decreasing financed emissions in the absolute term, it would be more practical to reduce the emissions intensity compared to the total assets, given the Group's asset portfolio.



#### **APPENDIX A: REFERENCE SOURCES**

This section will summarize the list of documents related to the TCFD. The following documents may be useful for FIs:

#### **Documents by TCFD**

- TCFD Key Reports and Guidance https://www.fsb-tcfd.org/
- TCFD Status report https://www.fsb-tcfd.org/publications/tcfd-2019-status-report/
- TCFD Knowledge Hub https://www.tcfdhub.org/
- Task Force on Climate-related Financial Disclosures Guidance on Risk Management Integration and Disclosure <a href="https://assets.bbhub.io/company/sites/60/2020/09/2020-TCFD\_Guidance-Risk-Management-Integration-and-Disclosure.pdf">https://assets.bbhub.io/company/sites/60/2020/09/2020-TCFD\_Guidance-Risk-Management-Integration-and-Disclosure.pdf</a>
- Task Force on Climate-related Financial Disclosures Guidance on Risk Management Integration and Disclosure https://assets.bbhub.io/company/sites/60/2021/07/2021-TCFD-Implementing\_Guidance.pdf
- TCFD Guidance on Metrics, Targets, and Transition Plans https://assets.bbhub.io/company/sites/60/2021/07/2021-Metrics\_Targets\_Guidance-1.pdf
- Recommendations of TCFD on Climate-related Financial Disclosures https://assets.bbhub.io/company/sites/60/2021/10/FINAL-2017-TCFD-Report.pdf

#### Guidance documents developed by public authorities and industry organizations:

- UK FRC Guide to Improve Financial Reporting Practice: UK FRC Financial Reporting Lab Guide <a href="https://www.frc.org.uk/getattachment/22ee8a43-e8ca-47be-944b-c394ecb3c5dd/Climate-Change-v9.pdf">https://www.frc.org.uk/getattachment/22ee8a43-e8ca-47be-944b-c394ecb3c5dd/Climate-Change-v9.pdf</a>
- EU EFRAG Report and Additional documents <a href="https://www.efrag.org/en/sustainability-reporting">https://www.efrag.org/en/sustainability-reporting</a>
- Document encouraging businesses to disclose and use climate-related information: JFSA TCFD Consortium of Japan https://tcfd-consortium.jp/en/news\_detail/20081201
- IIF TCFD Best Practices https://www.iif.com/Portals/0/Files/content/SFWG%20TCFD%20Practices%20Report vf.pdf
- UNEP FI Phase I Report to banks and investors:
  - Part 1: Transition Risks and Opportunities <a href="https://www.unepfi.org/wordpress/wp-content/uploads/2018/04/EXTENDING-OUR-HORIZONS.pdf">https://www.unepfi.org/wordpress/wp-content/uploads/2018/04/EXTENDING-OUR-HORIZONS.pdf</a> Conversion
  - Part 2: Physical Risks and Opportunities <a href="https://www.unepfi.org/wordpress/wp-content/uploads/2018/07/NAVIGATING-A-NEW-CLIMATE.pdf">https://www.unepfi.org/wordpress/wp-content/uploads/2018/07/NAVIGATING-A-NEW-CLIMATE.pdf</a>
  - Guidance for investors on methods for scenario-based climate risk assessment <a href="https://www.unepfi.org/wordpress/wp-content/uploads/2019/05/TCFD-Changing-Course-Oct-19.pdf">https://www.unepfi.org/wordpress/wp-content/uploads/2019/05/TCFD-Changing-Course-Oct-19.pdf</a>
- Charting a new climate report: <a href="https://www.unepfi.org/wordpress/wp-content/uploads/2020/09/Charting-a-New-Climate-UNEP-FI-TCFD-Banking-Physical-Risk.pdf">https://www.unepfi.org/wordpress/wp-content/uploads/2020/09/Charting-a-New-Climate-UNEP-FI-TCFD-Banking-Physical-Risk.pdf</a>
- Other Documents:
  - CDSB Application Guidelines: https://www.cdsb.net/sites/default/files/climateguidancedoublepage.pdf

# APPENDIX B: LIST OF SUBSECTORS OF THE FINANCIAL SECTORAL GUIDANCE

Organizations within the scope of this Sectoral guidance are enterprises operating in fields classified under Section K: Financial, Banking, and Insurance Activities (Level 1 Industry) according to Decision No. 27/2018/QĐ-TTg on promulgating Vietnam standard industrial classification, including: "financial service activities, including insurance, reinsurance and social insurance activities, financial intermediary activities and activities to support financial services. This section also includes: the activities of holding assets, such as activities of holding companies and the activities of trusts, funds and similar financial entities." According to Decision No. 27/QD-TTg, Section K (Level 1) is divided into 3 divisions (Level 2), further classified into 10 groups (Level 3), and these 10 groups are further divided into 19 classes (Level 4) and 20 sub-classes (Level 5).

The table below provides a detailed classification of the financial services sector according to Decision No. 27/QD-TTg.

Classificatio n System	Section	Division	Group	Name of subsector
<b>Decision Num</b>	ber. 27/QD	-TTg		
	K			Finance, Banking and Insurance Activities
		64		Financial service activities (except insurance and social
				insurance)
			641	Monetary intermediation
			642	Activities of holding companies
			643	Trusts, funds and similar financial entities
			649	Other financial service activities (except insurance and
				social insurance)
		65		Insurance, reinsurance and social insurance, except
				compulsory social security)
			651	Insurance
			652	Reinsurance
			653	Social Insurance
		66		Other financial activities
			661	Activities auxiliary to financial service (except insurance
				and social insurance)
			662	Activities auxiliary to insurance and social insurance
			663	Fund management activities

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- 1 https://kpmg.com/kpmg-us/content/dam/kpmg/corporate-communications/pdf/2023/banking-sector-leans-into-esg.pdf
  2 https://assets.kpmg.com/content/dam/kpmg/xx/pdf/2023/06/esg-fs-spotlight-web-pdf.pdf
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