

# UNEP FI Principles for Responsible Banking

## Reporting and self-assessment 2025

In 2020, FMO became a signatory to the United Nations Environment Programme Finance Initiative (UNEP FI) Principles for Responsible Banking (PRB) – a single framework for a sustainable banking industry developed through an innovative partnership between banks worldwide and UNEP FI. The PRB set out the banking industry's role and responsibility in shaping a sustainable future and aligning the sector with the objectives of the UN Sustainable Development Goals and the 2015 Paris Climate Agreement. Signatory banks are required to report no later than 18 months after signing the Principles, and annually thereafter. FMO published its first PRB self-assessment report in March 2022. This is FMO's fourth PRB report, in which we disclose our progress in implementing the Principles.

# Principle 1: Alignment



We will align our business strategy to be consistent with and contribute to individuals' needs and society's goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement and relevant national and regional frameworks.

## Business model

Describe (high-level) your bank's business model, including the main customer segments served, types of products and services provided, the main sectors and types of activities across the main geographies in which your bank operates or provides products and services. Please also quantify the information by disclosing e.g. the distribution of your bank's portfolio (%) in terms of geographies, segments (i.e. by balance sheet and/or off-balance sheet) or by disclosing the number of customers and clients served.

### Response

Detailed information about FMO's business model can be found in our Sustainability Statement, specifically in ESRS 2, section 'Strategy, business model, and value chain' (pages 111-115).

Information about the distribution of the bank's portfolio can be found in the World Map visual of the Management Board report (page 25).

### Links and references

[FMO 2024 Integrated Annual Report](#)

## Strategy alignment

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

- Yes  
 No

Please describe how your bank has aligned and/or is planning to align its strategy to be consistent with the Sustainable Development Goals (SDGs), the Paris Climate Agreement, and relevant national and regional frameworks.

**Does your bank also reference any of the following frameworks or sustainability regulatory reporting requirements in its strategic priorities or policies to implement these?**

- UN Guiding Principles on Business and Human Rights  
 International Labour Organization fundamental conventions  
 UN Global Compact  
 UN Declaration on the Rights of Indigenous Peoples  
 Any applicable regulatory reporting requirements on environmental risk assessments, e.g. on climate risk - please specify which ones: European Sustainability Reporting Standards, European Central Bank Guide on climate-related and environmental risks

Any applicable regulatory reporting requirements on social risk assessments, e.g. on modern slavery - please specify which ones: European Sustainability Reporting Standards  
 None of the above

*Response*

Details on our strategy alignment with the Sustainable Development Goals (SDGs) and the Paris Climate Agreement can be found in our Sustainability Statement. Refer to:

- ESRS 2, 'Strategy, business model, and value chain' (page 111) and 'IRO Management' (pages 118-124).
- E1 Climate change, 'E1-1 Transition plan for climate change mitigation' (pages 139-140) and 'E1-3 Actions and resources in relation to climate change policies' (pages 143-147).

For information on sustainability regulatory reporting requirements, see ESRS 2, 'Basis for preparation' (page 103).

*Links and references*

[FMO 2024 Integrated Annual Report](#)

## Principle 2: Impact and Target Setting



We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products and services. To this end, we will set and publish targets where we can have the most significant impacts.

### 2.1 Impact Analysis (Key Step 1)

Show that your bank has performed an impact analysis of its portfolio/s to identify its most significant impact areas and determine priority areas for target-setting. The impact analysis shall be updated regularly<sup>1</sup> and fulfil the following requirements/elements (a-d)<sup>2</sup>:

- a) Scope:** What is the scope of your bank's impact analysis? Please describe which parts of the bank's core business areas, products/services across the main geographies that the bank operates in (as described under 1.1) have been considered in the impact analysis. Please also describe which areas have not yet been included, and why.

*Response*

Information about FMO's impact analysis can be found within our Sustainability Statement in ESRS 2, section 'Double materiality assessment' (pages 105-109).

*Links and references*

[FMO 2024 Integrated Annual Report](#)

<sup>1</sup> That means that where the initial impact analysis has been carried out in a previous period, the information should be updated accordingly, the scope expanded as well as the quality of the impact analysis improved over time.

<sup>2</sup> Further guidance can be found in the [Interactive Guidance on impact analysis and target setting](#).

**b) Portfolio composition:** Has your bank considered the composition of its portfolio (in %) in the analysis? Please provide proportional composition of your portfolio globally and per geographical scope

- i) by sectors & industries<sup>3</sup> for business, corporate and investment banking portfolios (i.e. sector exposure or industry breakdown in %), and/or
- ii) by products & services and by types of customers for consumer and retail banking portfolios.

If your bank has taken another approach to determine the bank's scale of exposure, please elaborate, to show how you have considered where the bank's core business/major activities lie in terms of industries or sectors.

*Response*

Details about how FMO's portfolio composition is considered in the impact analysis can be found in ESRS 2, in the sections 'Double materiality assessment – process and methodology' (pages 106-107) and 'Main features of FMO's value chain' (pages 114-115).

*Links and references*

[FMO 2024 Integrated Annual Report](#)

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

**c) Context:** What are the main challenges and priorities related to sustainable development in the main countries/regions in which your bank and/or your clients operate?<sup>4</sup> Please describe how these have been considered, including what stakeholders you have engaged to help inform this element of the impact analysis.

*This step aims to put your bank's portfolio impacts into the context of society's needs.*

| <i>Response</i>   | <i>Links and references</i>                              |
|---|--|
| <p>Information about the main challenges and priorities related to sustainable development in the countries and regions where FMO operates can be found in ESRS 2, in the section ' Double materiality assessment':</p> <ul style="list-style-type: none"> <li>• Main challenges and priorities – Table 2 FMO material sustainability-related matters (pages 108-109)</li> <li>• How these have been considered and stakeholders engaged – 'Process and methodology' section (pages 106-108)</li> </ul> | <p><a href="#">FMO 2024 Integrated Annual Report</a></p> |

Based on these first 3 elements of an impact analysis, what positive and negative impact areas has your bank identified? Which (at least two) significant impact areas did you prioritize to pursue your target setting strategy (see 2.2)<sup>5</sup>? Please disclose.

| <i>Response</i>   | <i>Links and references</i>                              |
|---|--|
| <p>Details about FMO's positive and negative impacts can be found in the section 'Double materiality assessment' within ESRS 2, Table 2 FMO material sustainability-related matters (pages 108-109) and in the 'Impacts, risks and opportunities' sections within the Topical Standards, specifically:</p> <ul style="list-style-type: none"> <li>• E1 Climate change (pages 132-134)</li> <li>• E3 Water and marine resources (page 169)</li> <li>• E4 Biodiversity and ecosystems (pages 171-172)</li> <li>• S1 Own workforce (pages 179-181)</li> <li>• S2 Workers in the value chain (page 194)</li> <li>• S3 Affected communities (page 202)</li> <li>• S4 Consumers and end-users (page 208)</li> <li>• G1 Business conduct (pages 212-214)</li> </ul> <p>For information on the two impact areas – climate change and reducing inequalities – FMO has prioritized in its target setting strategy, please refer to the section 'IRO Management – Monitor and manage impact at portfolio level' within ESRS 2 (pages 122-124).</p> | <p><a href="#">FMO 2024 Integrated Annual Report</a></p> |

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

<sup>5</sup> To prioritize the areas of most significant impact, a qualitative overlay to the quantitative analysis as described in a), b) and c) will be important, e.g. through stakeholder engagement and further geographic contextualisation.

**d) For these (min. two prioritized impact areas): Performance measurement.** Has your bank identified which sectors & industries as well as types of customers financed or invested in are causing the strongest actual positive or negative impacts? Please describe how you assessed the performance of these, using appropriate indicators related to significant impact areas that apply to your bank's context.

In determining priority areas for target-setting among its areas of most significant impact, you should consider the bank's current performance levels, i.e. qualitative and/or quantitative indicators and/or proxies of the social, economic and environmental impacts resulting from the bank's activities and provision of products and services. If you have identified climate and/or financial health&inclusion as your most significant impact areas, please also refer to the applicable indicators in the [Annex](#).

If your bank has taken another approach to assess the intensity of impact resulting from the bank's activities and provision of products and services, please describe this.

*The outcome of this step will then also provide the baseline (incl. indicators) you can use for setting targets in two areas of most significant impact.*

*Response*

Details on how FMO has assessed the performance of the most significant positive and negative impacts can be found:

- ESRS 2: section 'Double materiality assessment' (pages 105-109)
- ESRS 2: section 'IRO Management' (pages 118-127)
- Topical Standards: sections on 'Impacts, risks, and opportunities' (refer to PRB Principle 2, section c. 'Context' for additional information).

*Links and references*

[FMO 2024 Integrated Annual Report](#)

### Self-assessment summary:

Which of the following components of impact analysis has your bank completed, in order to identify the areas in which your bank has its most significant (potential) positive and negative impacts?<sup>6</sup>

|                          |   |                                      |                             |
|--------------------------|---|--------------------------------------|-----------------------------|
| Scope:                   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> In progress | <input type="checkbox"/> No |
| Portfolio composition:   | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> In progress | <input type="checkbox"/> No |
| Context:                 | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> In progress | <input type="checkbox"/> No |
| Performance measurement: | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> In progress | <input type="checkbox"/> No |

Which most significant impact areas have you identified for your bank, as a result of the impact analysis?

Climate change mitigation, climate change adaptation, biodiversity, human rights, gender equality, decent employment, water, own workforce, workers in the value chain, affected communities, end-users and consumers, business conduct.

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

- Up to 6 months prior to publication
- Up to 12 months prior to publication
- Up to 18 months prior to publication
- Longer than 18 months prior to publication

Open text field to describe potential challenges, aspects not covered by the above etc.:  
(optional)

<sup>6</sup> You can respond “Yes” to a question if you have completed one of the described steps, e.g. the initial impact analysis has been carried out, a pilot has been conducted.

## 2.2 Target Setting (Key Step 2)

Show that your bank has set and published a minimum of two targets which address at least two different areas of most significant impact that you identified in your impact analysis.

The targets<sup>7</sup> have to be Specific, Measurable (qualitative or quantitative), Achievable, Relevant and Time-bound (SMART). Please disclose the following elements of target setting (a-d), for each target separately:

**a) Alignment:** which international, regional or national policy frameworks to align your bank's portfolio with<sup>8</sup> have you identified as relevant? Show that the selected indicators and targets are linked to and drive alignment with and greater contribution to appropriate Sustainable Development Goals, the goals of the Paris Agreement, and other relevant international, national or regional frameworks.

*You can build upon the context items under 2.1.*

| Response   | Links and references                              |
|--|---|
| Information about the policy frameworks that FMO has aligned its portfolio with can be found in ESRS 2, section 'IRO Management – Impact management at portfolio level' (pages 122-124). | <a href="#">FMO 2024 Integrated Annual Report</a> |

**b) Baseline:** Have you determined a baseline for selected indicators and assessed the current level of alignment? Please disclose the indicators used as well as the year of the baseline.

*You can build upon the performance measurement undertaken in 2.1 to determine the baseline for your target.*

*A package of indicators has been developed for climate change mitigation and financial health & inclusion to guide and support banks in their target setting and implementation journey. The overview of indicators can be found in the [Annex](#) of this template.*

If your bank has prioritized climate mitigation and/or financial health & inclusion as (one of) your most significant impact areas, it is strongly recommended to report on the indicators in the Annex, using an overview table like below including the impact area, all relevant indicators and the corresponding indicator codes:

| Impact area               | Indicator code | Response |
|---------------------------|----------------|----------|
| Climate change mitigation | ...            |          |
|                           | ...            |          |
|                           | ...            |          |

| Impact area                  | Indicator code | Response |
|------------------------------|----------------|----------|
| Financial health & inclusion | ...            |          |
|                              | ...            |          |
|                              | ...            |          |

In case you have identified other and/or additional indicators as relevant to determine the baseline and assess the level of alignment towards impact driven targets, please disclose these.

|   |   |
|---|---|
| <p><i>Response</i></p> <p>Information about the baseline for the indicators FMO has selected can be found in ESRS 2, section 'IRO Management– Monitor and Manage Impact at Portfolio Level'. Refer to:</p> <ul style="list-style-type: none"> <li>• Table 10, 'Minimum Disclosure Requirements for SDG 13 Target,' for indicators related to the climate change impact area (pages 123-124)</li> <li>• Table 9, 'Minimum Disclosure Requirements for SDG 10 Target,' for indicators concerning the reducing inequalities impact area (pages 122-123)</li> </ul> | <p><i>Links and references</i></p> <p><a href="#">FMO 2024 Integrated Annual Report</a></p> |
| <p><b>c) <i>SMART targets</i></b> (incl. key performance indicators (KPIs)<sup>9</sup>): Please disclose the targets for your first and your second area of most significant impact, if already in place (as well as further impact areas, if in place). Which KPIs are you using to monitor progress towards reaching the target? Please disclose.</p>   |   |
| <p><i>Response</i></p> <p>Information about the targets for the most significant impact areas and the KPIs used to monitor progress can be found in ESRS 2, section 'IRO Management– Monitor and Manage Impact at Portfolio Level'. Refer to:</p> <ul style="list-style-type: none"> <li>• Table 10, for the target related to the climate change impact area (pages 123-124)</li> <li>• Table 9, for the target addressing the reducing inequalities impact area (pages 122-123)</li> </ul>  | <p><i>Links and references</i></p> <p><a href="#">FMO 2024 Integrated Annual Report</a></p> |
| <p><b>d) <i>Action plan:</i></b> which actions including milestones have you defined to meet the set targets? Please describe.</p> <p>Please also show that your bank has analysed and acknowledged significant (potential) indirect impacts of the set targets within the impact area or on other impact areas and that it has set out relevant actions to avoid, mitigate, or compensate potential negative impacts.</p>  |   |
| <p><i>Response</i></p> <p>Information about the actions that FMO has defined to meet its set targets can be found in the Sustainability Statement.</p>  | <p><i>Links and references</i></p> <p><a href="#">FMO 2024 Integrated Annual Report</a></p> |

<sup>7</sup> Operational targets (relating to for example water consumption in office buildings, gender equality on the bank's management board or business-trip related greenhouse gas emissions) are not in scope of the PRB.

<sup>8</sup> Your bank should consider the main challenges and priorities in terms of sustainable development in your main country/ies of operation for the purpose of setting targets. These can be found in National Development Plans and strategies, international goals such as the SDGs or the Paris Climate Agreement, and regional frameworks. Aligning means there should be a clear link between the bank's targets and these frameworks and priorities, therefore showing how the target supports and drives contributions to the national and global goals.

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

|  |  |
|--|--|
| <ul style="list-style-type: none"> <li>• See E1 Climate Change, section 'E1-1 Transition plan for climate change mitigation' (pages 139-140) and section 'E1-3 Actions and resources in relation to climate change policies' (pages 143-147) for actions regarding climate change.</li> <li>• See S4 Consumers and end-users, section 'S4-4 Key actions' (pages 210-211) for actions regarding reducing inequalities.</li> </ul> |  |
|--|--|

### Self-assessment summary

Which of the following components of target setting in line with the PRB requirements has your bank completed or is currently in a process of assessing for your...

|               | ... first area of most significant impact: climate change  | ... second area of most significant impact: reduced inequalities   | <i>(If you are setting targets in more impact areas) ...your third (and subsequent) area(s) of impact: ... (please name it)</i> |
|---------------|--|--|---|
| Alignment     | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> In progress<br><input type="checkbox"/> No | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> In progress<br><input type="checkbox"/> No | <input type="checkbox"/> Yes<br><input type="checkbox"/> In progress<br><input type="checkbox"/> No                             |
| Baseline      | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> In progress<br><input type="checkbox"/> No | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> In progress<br><input type="checkbox"/> No | <input type="checkbox"/> Yes<br><input type="checkbox"/> In progress<br><input type="checkbox"/> No                             |
| SMART targets | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> In progress<br><input type="checkbox"/> No | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> In progress<br><input type="checkbox"/> No | <input type="checkbox"/> Yes<br><input type="checkbox"/> In progress<br><input type="checkbox"/> No                             |
| Action plan   | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> In progress<br><input type="checkbox"/> No | <input checked="" type="checkbox"/> Yes<br><input type="checkbox"/> In progress<br><input type="checkbox"/> No | <input type="checkbox"/> Yes<br><input type="checkbox"/> In progress<br><input type="checkbox"/> No                             |

## 2.3 Target implementation and monitoring (Key Step 2)

### For each target separately:

Show that your bank has implemented the actions it had previously defined to meet the set target.

Report on your bank's progress since the last report towards achieving each of the set targets and the impact your progress resulted in, using the indicators and KPIs to monitor progress you have defined under 2.2.

**Or, in case of changes to implementation plans (relevant for 2<sup>nd</sup> and subsequent reports only):** describe the potential changes (changes to priority impact areas, changes to indicators, acceleration/review of targets, introduction of new milestones or revisions of action plans) and explain why those changes have become necessary.

### *Response*

Information about FMO's progress toward achieving each of the set targets can be found in the Sustainability Statement. Refer to:

- ESRS 2: section 'IRO Management – Allocate and structure capital' (pages 119-120)
- E1 Climate change in the sections 'E1-1 Transition plan for climate change mitigation' (pages 139-140), 'E1-3 Actions and resources in relation to climate change policies' (pages 143-147) and 'E1-4 Targets related to climate change mitigation and adaptation' (pages 147-149)
- S4 Consumers and end-users in the section 'S4-4 Key actions' (pages 210-211)

### *Links and references*

[FMO 2024 Integrated Annual Report](#)

## Principle 3: Clients and Customers



We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.

### 3.1 Client engagement

Does your bank have a policy or engagement process with clients and customers<sup>10</sup> in place to encourage sustainable practices?

Yes       In progress       No

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

Yes       In progress       No

Describe how your bank has worked with and/or is planning to work with its clients and customers to encourage sustainable practices and enable sustainable economic activities<sup>11</sup>). It should include information on relevant policies, actions planned/implemented to support clients' transition, selected indicators on client engagement and, where possible, the impacts achieved.

*This should be based on and in line with the impact analysis, target-setting and action plans put in place by the bank (see P2).*

#### Response

Details on how FMO engages with its customers to encourage sustainable business practices can be found within our Sustainability Statement in ESRS 2 in the section 'IRO Management – ESG management at customer level' (pages 121-122).

Details on the policy for sectors in which FMO has identified the highest (potential) negative impacts can be found within our Sustainability Statement in S4 Consumers and end-users in the 'Introduction' section (page 207) where we provide information about how we apply the Client Protection Principles.

#### Links and references

[FMO 2024 Integrated Annual Report](#)

### 3.2 Business opportunities

Describe what strategic business opportunities in relation to the increase of positive and the reduction of negative impacts your bank has identified and/or how you have worked on these in the reporting period. Provide information on existing products and services, information on sustainable products developed in terms of value (USD or local currency) and/or as a % of

your portfolio, and which SDGs or impact areas you are striving to make a positive impact on (e.g. green mortgages – climate, social bonds – financial inclusion, etc.).

*Response*

Details on the opportunities FMO has identified in relation to the positive and negative impacts from the double materiality assessment can be found in the 'Impacts, risks and opportunities' section within the Topical Standards (refer to PRB Principle 2, section c. 'Context' for additional information).

*Links and references*

[FMO 2024 Integrated Annual Report](#)

## Principle 4: Stakeholders



We will proactively and responsibly consult, engage and partner with relevant stakeholders to achieve society's goals.

### 4.1 Stakeholder identification and consultation

*Does your bank have a process to identify and regularly consult, engage, collaborate and partner with stakeholders (or stakeholder groups<sup>12</sup>) you have identified as relevant in relation to the impact analysis and target setting process?*

Yes       In progress       No

Please describe which stakeholders (or groups/types of stakeholders) you have identified, consulted, engaged, collaborated or partnered with for the purpose of implementing the Principles and improving your bank's impacts. This should include a high-level overview of how your bank has identified relevant stakeholders, what issues were addressed/results achieved and how they fed into the action planning process.

*Response*

Details on how FMO engages with stakeholders can be found within ESRS 2 in the 'Interests and views of stakeholders' section of the Sustainability Statement (pages 115-118).

*Links and references*

[FMO 2024 Integrated Annual Report](#)

<sup>10</sup> A client engagement process is a process of supporting clients towards transitioning their business models in line with sustainability goals by strategically accompanying them through a variety of customer relationship channels.

<sup>11</sup> Sustainable economic activities promote the transition to a low-carbon, more resource-efficient and sustainable economy.

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

## Principle 5: Governance & Culture



We will implement our commitment to these Principles through effective governance and a culture of responsible banking

### 5.1 Governance Structure for Implementation of the Principles

Does your bank have a governance system in place that incorporates the PRB?

Yes       In progress       No

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

- which committee has responsibility over the sustainability strategy as well as targets approval and monitoring (including information about the highest level of governance the PRB is subjected to),
- details about the chair of the committee and the process and frequency for the board having oversight of PRB implementation (including remedial action in the event of targets or milestones not being achieved or unexpected negative impacts being detected), as well as
- remuneration practices linked to sustainability targets.

#### *Response*

Details on FMO's governance structure related to sustainability matters can be found within ESRS 2 in the 'Governance of sustainability matters' section of the Sustainability Statement (pages 127-130).

FMO's commitment to the Principles for Responsible Banking is part of our Sustainability Policy Universe. This policy framework falls under the authority of the Management Board and is delegated to the Impact and Sustainability Committee (ISCO) for implementation.

#### *Links and references*

[FMO 2024 Integrated Annual Report](#)

### 5.2 Promoting a culture of responsible banking:

Describe the initiatives and measures of your bank to foster a culture of responsible banking among its employees (e.g., capacity building, e-learning, sustainability trainings for client-facing roles, inclusion in remuneration structures and performance management and leadership communication, amongst others).

#### *Response*

Details on FMO's policies and initiatives to promote a culture of responsible banking can be found in the Sustainability Statement:

- G1 Business Conduct:

#### *Links and references*

[FMO 2024 Integrated Annual Report](#)

|  |  |
|--|--|
| <ul style="list-style-type: none"> <li>○ G1-1 Business conduct policies and corporate culture (pages 214-215)</li> <li>○ G1-3 Anti-bribery and corruption (pages 215-218)</li> <li>○ Governance and compliance (pages 219-220)</li> <li>○ G1 Key actions (pages 220-221)</li> <li>● ESRs 2 General Information:             <ul style="list-style-type: none"> <li>○ Strategy, business model and value chain – FMO’s own operations (page 114)</li> </ul> </li> <li>● E4 Biodiversity and ecosystems:             <ul style="list-style-type: none"> <li>○ E4-3 Key actions (page 176)</li> </ul> </li> <li>● S4 Consumers and end users:             <ul style="list-style-type: none"> <li>○ S4-4 General actions (page 210)</li> </ul> </li> </ul> |  |
|--|--|

### 5.3 Policies and due diligence processes

Does your bank have policies in place that address environmental and social risks within your portfolio?<sup>13</sup> Please describe.

Please describe what due diligence processes your bank has installed to identify and manage environmental and social risks associated with your portfolio. This can include aspects such as identification of significant/salient risks, environmental and social risks mitigation and definition of action plans, monitoring and reporting on risks and any existing grievance mechanism, as well as the governance structures you have in place to oversee these risks.

| <i>Response</i>  | <i>Links and references</i>                              |
|--|--|
| <p>Details on the policies and due diligence processes that FMO has in place to address environmental and social risks within its portfolio can be found within ESRs 2 in the 'IRO Management – Monitor and manage impact at portfolio level' section of the Sustainability Statement (pages 122-127).</p> | <p><a href="#">FMO 2024 Integrated Annual Report</a></p> |

### Self-assessment summary

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

Yes  No

Does the governance system entail structures to oversee PRB implementation (e.g. incl. impact analysis and target setting, actions to achieve these targets and processes of remedial action in the event targets/milestones are not achieved or unexpected neg. impacts are detected)?

Yes  No

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

Yes  In progress  No

<sup>13</sup> Applicable examples of types of policies are: exclusion policies for certain sectors/activities; zero-deforestation policies; zero-tolerance policies; gender-related policies; social due diligence policies; stakeholder engagement policies; whistle-blower policies etc., or any applicable national guidelines related to social risks.

## Principle 6: Transparency & Accountability



We will periodically review our individual and collective implementation of these Principles and be transparent about and accountable for our positive and negative impacts and our contribution to society's goals.

### 6.1 Assurance

Has this publicly disclosed information on your PRB commitments been assured by an independent assurer?

Yes       Partially       No

If applicable, please include the link or description of the assurance statement.

#### *Response*

An independent assurance provider has conducted a limited assurance engagement on the consolidated Sustainability Statement, disclosed in FMO's 2024 Integrated Annual Report. The details in this PRB report are entirely derived from the disclosures in FMO's Sustainability Statement.

Please note that the independent assurance provider was not involved in the preparation and review of this separate UNEP FI PRB submission and as such, is not responsible for any information in this report.

The independent auditor's report and assurance report can be found on pages 317-334 of FMO's Integrated Annual Report.

#### *Links and references*

[FMO 2024 Integrated Annual Report](#)

### 6.2 Reporting on other frameworks

Does your bank disclose sustainability information in any of the listed below standards and frameworks?

- GRI
- SASB
- CDP
- IFRS Sustainability Disclosure Standards (to be published)
- TCFD
- Other: ESRS

|   |   |
|---|---|
| <p><i>Response</i></p> <p>FMO's Integrated Annual Report is fully aligned with the European Sustainability Reporting Standards (ESRS).</p>  | <p><i>Links and references</i></p> <p><a href="#">FMO 2024 Integrated Annual Report</a></p> |
| <p><b>6.3 Outlook</b></p> <p>What are the next steps your bank will undertake in next 12 month-reporting period (particularly on impact analysis<sup>14</sup>, target setting<sup>15</sup> and governance structure for implementing the PRB)? Please describe briefly.</p>   |   |
| <p><i>Response</i></p> <p>Details on the steps FMO will undertake over the next 12 months can be found in the Sustainability Statement, specifically in:</p> <ul style="list-style-type: none"> <li>• ESRS 2 sections ‘ Risk management and internal controls – future actions’ (for governance, page 131), ‘Interests and views of stakeholders – future steps toward our stakeholder dialogues’ (for policies, page 118), and ‘Basis for preparation – Table 1 Metrics and data subject to measurement uncertainty’ (for improvements to data quality, page 104-105)</li> <li>• Topical standards sections ‘Key actions’ (for future actions per topic): <ul style="list-style-type: none"> <li>○ E1 Climate change (pages 143-147)</li> <li>○ E3 Water and marine resources (page 170)</li> <li>○ E4 Biodiversity and ecosystems (pages 176-177)</li> <li>○ S1 Own workforce (pages 184-185)</li> <li>○ S2 Workers in the value chain (pages 198-199)</li> <li>○ S3 Affected communities (pages 205-206)</li> <li>○ S4 Consumers and end-users (pages 210-211)</li> <li>○ G1 Business conduct (pages 220-221)</li> </ul> </li> </ul> | <p><i>Links and references</i></p> <p><a href="#">FMO 2024 Integrated Annual Report</a></p> |

<sup>14</sup> For example outlining plans for increasing the scope by including areas that have not yet been covered, or planned steps in terms of portfolio composition, context and performance measurement

<sup>15</sup> For example outlining plans for baseline measurement, developing targets for (more) impact areas, setting interim targets, developing action plans etc.

## 6.4 Challenges

Here is a short section to find out about challenges your bank is possibly facing regarding the implementation of the Principles for Responsible Banking. Your feedback will be helpful to contextualise the collective progress of PRB signatory banks.

What challenges have you prioritized to address when implementing the Principles for Responsible Banking? Please choose what you consider the top three challenges your bank has prioritized to address in the last 12 months (optional question).

If desired, you can elaborate on challenges and how you are tackling these:

- |  |  |
|--|--|
| <input type="checkbox"/> Embedding PRB oversight into governance                               | <input type="checkbox"/> Customer engagement             |
| <input type="checkbox"/> Gaining or maintaining momentum in the bank                           | <input type="checkbox"/> Stakeholder engagement          |
| <input type="checkbox"/> Getting started: where to start and what to focus on in the beginning | <input type="checkbox"/> Data availability               |
| <input type="checkbox"/> Conducting an impact analysis   | <input type="checkbox"/> Data quality                    |
| <input type="checkbox"/> Assessing negative environmental and social impacts                   | <input type="checkbox"/> Access to resources             |
| <input type="checkbox"/> Choosing the right performance measurement methodology/ies            | <input type="checkbox"/> Reporting                       |
| <input type="checkbox"/> Setting targets   | <input type="checkbox"/> Assurance                       |
| <input type="checkbox"/> Other: ...  | <input type="checkbox"/> Prioritizing actions internally |

If desired, you can elaborate on challenges and how you are tackling these: