

ENVIRONMENTAL
AND CLIMATE
CHANGE POLICY




Target audience:	Group Companies																
Policy Owner (Responsible for the document):	JSC TBC Bank ESG Coordination Department																
Units engaged in the implementation:	JSC TBC Bank ESG Coordination Department CEOs/Management boards of the Group Companies																
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Approved by:	TBC Bank Group PLC Board of Directors  Arne Berggren Chairman of the TBC Bank Group PLC Board of Directors																
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In the event of any discrepancies between the English version of this Policy and a translated version, the English version shall prevail.																	
<table border="1" style="width: 100%;"> <thead> <tr> <th style="width: 50%; text-align: center;">Version</th> <th style="width: 50%; text-align: center;">Date</th> </tr> </thead> <tbody> <tr> <td>Current version</td> <td>1st</td> </tr> <tr> <td>Revision frequency</td> <td>10.01.2023</td> </tr> <tr> <td>Accessibility</td> <td>Annual/Ad hoc</td> </tr> <tr> <td>Application</td> <td>Public</td> </tr> <tr> <td>Implementation</td> <td>All Group Companies must adhere to this Policy in its entirety. If a Group Company wishes to adopt and modify its content, it may do so as long as the modifications do not contravene the intent of this Code. Otherwise, any changes made require approval from TBC Bank Group PLC Board of Directors.</td> </tr> <tr> <td>Definitions</td> <td>In order to implement this policy, Management adopts the relevant procedures / guidelines that should be established following the rules outlined by Subsidiary Governance Procedure.</td> </tr> <tr> <td></td> <td>Terms written in bold capital letters that have not been defined in this policy will carry the same meanings as stated in the Glossary approved by TBC Bank Group PLC Board of Directors</td> </tr> </tbody> </table>		Version	Date	Current version	1st	Revision frequency	10.01.2023	Accessibility	Annual/Ad hoc	Application	Public	Implementation	All Group Companies must adhere to this Policy in its entirety. If a Group Company wishes to adopt and modify its content, it may do so as long as the modifications do not contravene the intent of this Code. Otherwise, any changes made require approval from TBC Bank Group PLC Board of Directors.	Definitions	In order to implement this policy, Management adopts the relevant procedures / guidelines that should be established following the rules outlined by Subsidiary Governance Procedure.		Terms written in bold capital letters that have not been defined in this policy will carry the same meanings as stated in the Glossary approved by TBC Bank Group PLC Board of Directors
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Table of Contents

1. PURPOSE AND SCOPE OF THE POLICY	4
2. GUIDING PRINCIPLES	4
3. OBJECTIVES FOR CLIMATE ACTION	5
4. STRUCTURE OF ENVIRONMENTAL MANAGEMENT SYSTEM	5
4.1. Pillar I – Internal environmental measures:	6
4.2. Greenhouse gas emissions	6
4.3. Pillar II – Environmental and Social risk management of lending:	6
4.4. Pillar III – Sustainable Finance:	7
4.5. Pillar IV – External Communication:	7
4.5.1. Outgoing Communication	7
4.5.2. Incoming Communication	8
5. SOCIAL ASPECTS OF THE POLICY.....	8
6. CLIMATE CHANGE: RISKS AND OPPORTUNITIES	8
7. AWARENESS RAISING AND TRAINING.....	9
8. INTERNAL AND EXTERNAL COMMUNICATION ON CLIMATE CHANGE	9
8.1 Internal Communication	10
8.2 External Communication	10
9. MONITORING AND REPORTING.....	10
10. ROLES AND RESPONSIBILITIES	11
10.1 Roles and Responsibilities at TBC Level.....	11
10.2 Roles and Responsibilities at Banks Level.....	11
10.3 Roles and Responsibilities at Group Company Level	12
11. RELATED POLICIES	13

1. PURPOSE AND SCOPE OF THE POLICY

- 1.1. Our aspiration to contribute to sustainable development comes from our role as a leading financial institution. We are aware that we have an impact on the country's economy, business development, employment, and the progress of the society as a whole. This role is connected to our responsibility to contribute to a better future through innovation and technology. While pursuing our aspirations, we guide our activities in line with international sustainability standards and principles, making them a part of the strategy, culture, and day-to-day operations of our company.
- 1.2. The institutional structures and respective initiatives of this **Policy** support **TBC's** approach that sets targets and establishes a methodology of advancing climate action and integrating its approach into the operations and management processes of the **Group**, focusing on diverse environmental, social and governance (**ESG**) areas.
- 1.3. **Management** of TBC is showing leadership and commitment in respect to the EMS and climate change and is taking accountability for the effectiveness of the system, by defining the framework of the system through this **Policy**. It has the overall responsibility to coordinate the implementation of the **Policy**, making needed resources available, giving responsibilities and authorities to relevant **Employees** and communicating and promoting the importance of effective environmental management and continual improvement of the environmental performance.
- 1.4. The climate action strategy is a part of the **ESG** Strategy that covers climate change, direct and indirect environmental impact, sustainable development across **TBC**, customers, **Employees**, suppliers and society, financial inclusion, **Employee** relations and talent management, workplace diversity and inclusion. **TBC's** **ESG** strategy sets targets for direct and indirect environmental impacts and social and governance matters for different time horizons.
- 1.5. This **Policy** is largely an internal guidance document, supporting the implementation of **TBC's** **ESG** Strategy. The **Policy** applies to the **Employees** of **TBC**. The **Policy** provides a broad strategic orientation for implementation, including institutionalizing the climate-related matters in the organizational culture and advancing climate actions in all areas of operations. The **Policy** is complemented by detailed action plans. The action plan(s) are developed on annual basis. The **Policy** shall be implemented in all **Group Companies** to the extent, to which it is relevant for their operations and activities; the respective action plan(s) has to be agreed upon.
- 1.6. Specific issues related to this policy are regulated by the Environmental and Climate Change Policy (ECCP) Implementation guideline

2. GUIDING PRINCIPLES

- 2.1. **TBC** guide its activities in line with international sustainability standards and principles, making them a part of the strategy, culture, and day-to-day operations of **TBC**. These international standards are as follows:
 - IFC Performance Standards and EBRD Performance Requirements (PRs) and ADB's Safeguard Requirements (SRs);

- Task Force on Climate-related Financial Disclosures (TCFD);
- Nationally Determined Contribution (NDC);
- Paris Agreement;
- NBG Sustainable Finance (SF) Taxonomy;
- ISO 14001:2015.

3. OBJECTIVES FOR CLIMATE ACTION

3.1. The long-term aspirations are supported by different measures outlined in the **ESG** Strategy.

3.2. The key components for the following years are listed below:

- Increase of the sustainable loan portfolio
- Implementation of the green loan framework which offers a tailored green financing for business
- Elaboration of approach for data collection, segregation and analysis;
- Elaboration of a methodology to calculate financed emissions;
- Measure **TBC's** direct performance towards the Paris Agreement targets for the reduction of GHG emissions;
- Incorporation of **ESG** matters in the risk appetite;
- **ESG** resource center for **Employees**, customers and wider public to increase awareness and knowledge about the risks and opportunities of climate change;
- **TBC** aspires to make its direct environmental impact net zero by 2025 and continue to develop the plan to enable its indirect environmental impact to also reach net zero as soon as practicable thereafter.

3.3. As the largest financial group in the country, we fully understand the importance of doing business with minimal impact on the environment. Thus, the main principles of the **EMS** are as following:

- Defining the environmental aspects and impacts of our business activity;
- Elaborating and developing measures to minimize negative impact on the environment
- Take efficiency and responsible resource management into account;
- Be in compliance with applicable environmental, health, safety and labor regulations;
- Awareness raising among our **Employees**;
- Do not finance businesses that have negative effect on environment and society (Exclusion List);
- Promoting sustainability finance among our clients.

4. STRUCTURE OF ENVIRONMENTAL MANAGEMENT SYSTEM

TBC's environmental management system (**EMS**) is in based on the ISO 14001:2015 standard. The **Policy** defines the structure on how to document its core regulations and guidelines. In this respect the policy sets verifiable standards for the further development of the **EMS**. The **Management Board** and all **Employees** of **TBC** are obliged to comply with the regulations of the **EMS**.

The **EMS** includes four directions/pillars. More specifically, this involves implementing an internal environmental management system which addresses the resource consumption and other environmental impacts of daily operations in **TBC**, manages the environmental and social impacts of its lending activities, uses sustainability finance to promote energy efficient, renewable energy and social investments by clients and covers external communication meaning the grievance mechanism,

annual disclosure of GHG emissions from **TBC's** own operations and various reporting of the **E&S** risk performance for IFI's, stakeholders and interested parties.

4.1. **Pillar I – Internal environmental measures:**

Direct environmental aspects relate to activities that can be completely controlled by **TBC** and/or by internal management decisions. These include the usual starting points for corporate environmental protection: Emissions into water or the air, recycling and disposal of waste, resource and energy consumption.

Indirect environmental aspects, in contrast, have impacts that are only indirectly caused by the activities, products or services of an organization. They can be the result of interaction with a third party, and can be influenced by the company itself only to a limited extent or to a certain degree, e.g. the selection and composition of services, behavior of clients, etc.

The aspects are listed in the Register of Environmental Aspects, which is part of the Annual Environmental Plan.

According to the methodology described in the Implementation Guideline depending on this analysis it is determined if the aspect can be considered as significant or not. Both positive and negative environmental impacts can be considered.

The Environmental Legal Check is conducted on the annual base. Compliance with the law is one of the preconditions for certification of the **EMS**. Therefore, the applicability of environmental legislation and the institution's compliance with it must be monitored. The **Banks** are subject to few legal requirements regarding its environmental aspects. The Environmental Legal Register details the specific legal and other requirements applicable to the **Banks** and shows how the requirements apply to the **Banks'** environmental aspects.

4.2. **Greenhouse gas emissions**

As a premium-listed company trading on the LSE, **TBC** is required to calculate and report upon the greenhouse gas (GHG) emissions stemming from its direct operations. For this purpose, **TBC** has established a comprehensive internal environmental system to manage its GHG emissions within the and is committed to reducing its GHG emissions by closely monitoring consumption of fuel, gas and electricity. For more details, please refer to Annual Report: <https://www.tbcbankgroup.com/investors/results-center/>

4.3. **Pillar II – Environmental and Social risk management of lending:**

By assessing and monitoring the environmental and social impacts as part of the credit risk analysis of business clients, incentivizing the use of environmental best practices in their businesses and engaging in sustainability financing, **TBC** expects to mitigate the negative environmental impact of the financed businesses. Doing so, **TBC** has developed Environmental and Social Risk Management Procedures to ensure that appropriate, risk-based, sector specific, environmental and social risk assessment is applied to its commercial lending activities. These procedures are fully integrated into the credit risk management process in the **Banks** and are routinely applied to all commercial (i.e., with legal entities) transactions.

The **Banks'** Environmental and Social procedures include transaction Qualification, and the Risk Categorization, Identification and appropriate Assessment, Mitigation and Control, and Monitoring and Reporting of environmental and social risks. The procedures incorporate appropriate consideration of IFC Performance Standards and EBRD Performance Requirements (PRs) and ADB's Safeguard Requirements (SRs).

Implementation of this ESMS ensures the **Banks'** own operations comply with both PS/PR-1(Social and Environmental Assessment) and PS/PR-2 (Labor and Working Conditions) and applicable ADB's SRs. For all commercial transaction, the **Banks'** will endeavor to ensure that customers demonstrate an organized and systematic approach to environmental and social risk management to ensure compliance with local and national environmental, health and safety, and labor regulations and standards. In implementing these procedures the **Banks'** routinely conducts trainings of relevant officers in collaboration with IFIs and relies of the use of a variety of publicly available environmental and social risk management tools including, but not limited to, domestic regulations, EBRD's Environmental and Social Risk Management Manual (e-Manual v4.0), website supported by IFC <https://firstforsustainability.org/>, FMO's sectoral guidelines for environmental and social risk assessment and ADB's ESMS Template for Banks and Funds, which are unified in sector specific ESDD forms developed by the **Banks**.

4.4. **Pillar III – Sustainable Finance:**

As an integral part of its policy the **Banks** have commitment towards Sustainable Lending Development within the company. Standardization of Sustainable Finance including energy efficiency, renewable energy and resource efficiency financing as for private as well as for business clients is vital. To ensure credibility of the eligibility criteria of Sustainable measures the **Banks** have partnering with international financial institution to conduct local market research and set benchmark for Green Finance to streamline and considerably enhance the existing green lending operations through the establishment of the dedicated Green Lending Guidelines. Furthermore, the Green and Social Taxonomies of the National Bank of Georgia constitute the main guidance framework for sustainable lending, starting from 1st January 2023.

4.5. **Pillar IV – External Communication:**

4.5.1. **Outgoing Communication**

External communication (both incoming and outgoing) is handled and documented with clear responsibilities within the company. Outgoing external communication includes the Environmental Principles, the Annual Environmental Performance, and other relevant information and marketing materials.

The Annual GHG emissions report summarizes the environmental performance of the **Banks** and is directed to stakeholders and all interested parties. It lays down the results achieved in the last year with regard to the **EMS**. The Report has to be easily and freely made available for anybody interested in the environmental performance of the company, therefore it is published on the webpage: <https://www.tbcbankgroup.com/responsibility/our-environment>

Other marketing material is discussed with and coordinated through the marketing group, which manages all centrally issued marketing material of the **Banks**.

4.5.2. Incoming Communication

Incoming communication regarding the **Banks'** environmental management is managed in the same way as formal communication received by the organization on all issues, only that here the Environmental and Social Risk Management Team is also informed.

Received communications are also documented by the Environmental and Social Risk Management Team. It is also responsible for reporting on communication from external interested parties in management reviews, including e.g. complaints. Records of all communication will be kept, including responses according to the **Banks'** Procedure for addressing External E&S Queries and Concerns. Interested parties may submit their query on the webpage: <http://www.tcbank.ge/web/en/web/guest/e-s> to the following e-mail address: E&Srisk@tcbank.com.ge

5. SOCIAL ASPECTS OF THE POLICY

- 5.1. **TBC**, in all areas of its activity, pays significant attention to social issues, such as respect for human rights, **Employee** relations, protection of labor rights, providing **Employees'** access to health services through health insurance and ensuring of safe, equal and non-discriminatory working conditions etc.
- 5.2. **TBC** treats its **Employees**, customers and other stakeholders with respect and dignity. During the decision-making, **TBC** excludes all forms of discrimination, inter alia, discrimination on the basis of race, origin, skin color, religion, ethnicity, citizenship, marital status, veteran status, sex and gender identity, sexual orientation, age and disability unless it is beyond reasonable limits.
- 5.3. Each **Employee** has the commitment to ensure working environment free from violence, discrimination and/or inappropriate behavior. **TBC** respects the **Employee** with different views and ensures equal working conditions for them.
- 5.4. During investing and lending, **TBC** assesses and considers customers' compliance status with domestic legislative requirements and international standards of social issues, such as: respect for human rights, **Employee** relations, providing occupational health and safety, ensuring safe working environment, considering the interests of affected people by the customers' operation or implementing particular business project and informing and involving any other interested parties etc.
- 5.5. Prior partnering with contractor (supply chain) companies, **TBC** contemplates their compliance with **TBC** environmental and social standards and domestic legislative requirements. The companies take a commitment that their activities meet the requirements of all the environmental, healthcare, safety and labor regulatory normative acts. Besides, the mentioned requirements will be fulfilled by the companies at any stage of their relationship with **TBC**.

6. CLIMATE CHANGE: RISKS AND OPPORTUNITIES

6.1. Risks

The risks associated with climate change have both a physical impact arising from more frequent and severe weather changes and a transitional impact that may entail extensive policy, legal and technological changes to reduce the ecological footprint of the households and businesses. For **TBC** both risks can materialize through the impairment of asset values and the deteriorating creditworthiness of customers, which could result in a reduction of **TBC's** profitability. **TBC** may also

become exposed to reputational risks because of its lending to or other business operations with customers deemed to be contributing to climate change.

To identify, assess and manage risks associated with climate change, **TBC** introduced the overall climate risk assessment, **TBC** performed a general analysis to understand the maturity level of the **ESG** framework. The general analysis process covers the assessment of the existing policies and procedures, identification of areas for further development and gap analysis. Based on the analysis, the main focus areas are identified and reflected in the **ESG** strategy, considering the business strategy of **TBC**.

6.2. Opportunities

We acknowledge the importance of sustainable lending and are actively involved in developing a standardized approach to sustainable finance, including energy efficiency, renewable energy and resource efficiency financing for our retail and business clients. These procedures will help the **Banks** to identify green and environmentally friendly initiatives and encourage private companies to move to sustainable investment in their businesses, thus contributing to climate change mitigation and adaptation.

7. AWARENESS RAISING AND TRAINING

7.1. Raising awareness and thereby understanding the effects of climate change will facilitate both behavioral change and societal support for the actions needed to reduce greenhouse gas emissions. NDC also recognizes the importance of awareness-raising on climate change mitigation and adaptation process and plans to implement the respective measures. Therefore, **TBC** aims to increase understanding of the impact of climate change on business activities, the environment and society.

7.2. **TBC** develops awareness raising and training concepts in order:

- to raise awareness among customers about the climate-related opportunities and risks; furthermore, **TBC** seeks to equip representatives of businesses with basic knowledge about the approaches, tools, and mechanisms to identify and materialize opportunities and mitigate risks.
- to increase the expertise of **TBC Employees** regarding the climate-related opportunities, risks and other standards, as well as to equip our **Employees** with the knowledge and skills on how to bring green and social products closer to customers and to make the community more conscious and raise their awareness of climate change risks and challenges.

7.3. Since education and awareness-raising are significant parts of the **ESG** strategy, **TBC** aims to design continuous climate-related training sessions and learning courses for **Employees** and customers from different segments and sectors. The tailor-made courses and training sessions will strengthen **TBC's** capacity, knowledge, and capabilities to manage climate-related risks across the business. **TBC** is focused not only on the internal capacity building but on the public awareness-raising of renewable energy, climate change adaptation and green financing opportunities. Therefore, we incorporate climate-friendly initiatives and campaigns to reach a broader audience, aiming to integrate climate-smart lifestyles and approaches into the society.

8. INTERNAL AND EXTERNAL COMMUNICATION ON CLIMATE CHANGE

8.1 Internal Communication

Responsible departments collect and monitor relevant information related to **TBC's** climate action strategy, review this and related policies annually and provide information, advice, and assistance to managers and **Employees** on climate change matters.

TBC will regularly report on the impact of climate action strategy, action plans and measures to improve accountability to commitments made and ensure progress and results. It will also collect reliable and measurable data to measure and report on progress achieved in promoting climate-related best practices.

TBC will conduct communication activities and disseminate information among **TBC Employees** using all effective channels for internal communication.

8.2 External Communication

Climate action strategy can be a visible part of **TBC's** external identity and self-portrayal that clearly emphasizes the importance of this issue for both the organization's personnel and their respective target group audience. Progress on climate action strategy should be communicated to all stakeholders. The communication could reveal evidence of the effectiveness of the implementation of good practice and could yield more effective activities and measures. Thus, it is necessary to communicate and sustain all results achieved through all possible channels such as meetings, public events, workshops, and dialogues, as well as documents, notice boards and marketing materials.

TBC is committed to:

- address climate change and related topics as important parts of the organization's objectives
- highlight this commitment on the organization's website or in its publications

Engaging with stakeholders and the communities in which the company operates to promote climate action - is another important way of economic empowerment.

TBC should develop an annual plan for communication programs that make valuable, effective, and responsible contributions to climate action. We are committed to contributing to climate change mitigation and adaptation and improve opportunities for people by supporting business development.

9. MONITORING AND REPORTING

9.1 Transparency and accountability, as well as measuring and reporting mechanisms are crucial to monitor and track performance and progress.

9.2 **TBC** has established a comprehensive internal environmental system to manage and report its GHG emissions within **TBC** and is committed to reducing its GHG emissions by closely monitoring its consumption of energy, water, and paper. The guidelines for documenting environmental data were developed and the responsible **Employees** was assigned to subsidiary companies to collect and provide the required data.

9.3 For its financed emissions, the **Banks** calculate the reduction of the GHG emissions within the Green Loan Framework, which provides a calculation tool to define the reduction of the GHG emissions by a particular green loan (at least 20% in comparison with the baseline).

9.4 At **TBC** level, regular reporting to the **ESG and Ethics Committee** on climate-related matters shall be in place.

- 9.5 At the **Group Companies'** level, the internal reporting system is ensured in line with a respective organizational structure. Every **Group Company** shall deliver respective data in support of the reporting processes at **TBC**.
- 9.6 At the **Banks** level, a system for regular internal reporting on climate-related matters shall be in place at the **ESG** Committee level.
- 9.7 In line with international best practices and regulatory requirements, the **Banks** shall incorporate the information about climate-related topics, as well as other related data in an annual / sustainability or other relevant reports and/or disclose publicly, e.g., on **TBC** websites. The information can be disclosed as stand-alone document or can be integrated into existing reporting systems.

10. ROLES AND RESPONSIBILITIES

10.1 Roles and Responsibilities at TBC Level

Board Of Directors

The **Board** ensures the oversight and implementation of the **Policy**.

Committees

The **ESG and Ethics Committee** supports the **Board** in the implementation of the **Policy** at **TBC** level. The role of the Committee is formalized to support and advise the **Board** in its oversight of the implementation of (i) strategy (ii) policies and (iii) programs of the **Group Company** and its subsidiaries in relation to Environmental, Social and Governance matters and ensuring that the **ESG** strategy is implemented across all relevant businesses of **TBC**. Furthermore, the **ESG and Ethics Committee** supports the **Board** in promoting its collective vision of values, conduct and culture and overseeing management's efforts (i) to foster a culture of ethics (ii) appropriate conduct, and (iii) **Employee** ethical engagement within **TBC**. The **ESG and Ethics Committee** meets at least four times per year Under the **ESG** oversight of the **ESG and Ethics Committee** are: a) periodical review of **TBC's ESG** strategy, including climate strategy, as well as implementation plans and monitoring of its execution; b) oversee **TBC's** disclosures on **ESG** matters, including reporting in line with the TCFD principles, in the Annual Report and Accounts

The Committee develops a monitoring system that provides evidence of how much progress has been made in the process of organizational change, identifies spots where reinforced efforts or new priorities are needed, and whether adjustments should be made to the working plan, for example, due to changes in external conditions.

10.2 Roles and Responsibilities at Banks Level

Supervisory Board and Committees of the the **Banks**

Supervisory Board and respective committees of the **Banks** supervise compliance with this **Policy** by the **Management Board** of the **Banks**.

The **ESG and Ethics Committee** assists the **Supervisory Board** in monitoring and evaluating compliance with this **Policy** by the **Management Board** of the **Banks**. Other committees, as well, may have their responsibilities regarding this policy, according to their terms of reference.

The Committee develops a monitoring system that provides evidence of how much progress has been made in the process of organizational change, identifies spots where reinforced efforts or new priorities are needed, and whether adjustments should be made to the working plan, for example due to changes in external conditions.

Management Board

The **Management Board** ensures the implementation of the **Policy** in **Banks**. It is the responsibility of the **Management Board** to establish necessary committee(s) or organizational unit(s) and provide required resources.

Management Board ensures that involved **Employees** are required to spend part of their working time on human rights mainstreaming in company's operations. Where necessary, the job descriptions of **Employees** have to be amended in order to reflect responsibilities related to human rights activities, defined by this **Policy**.

The management level committees

The **ESG Committee** at the executive management level supports the **Management Board** in the implementation of the **Policy**. The committees are led by a chairperson represented by a senior level management and comprised of members - mid-level management who are responsible for implementing the **Policy** in the areas of their responsibilities. Where such committee is not established, the **Management Board** should assign the responsibilities to other committee.

The **ESG Committee** develops a monitoring system that provides evidence of how much progress has been made in the process of organizational change, identifies spots where reinforced efforts or new priorities are needed, and whether adjustments should be made to the working plan, for example due to changes in external conditions.

ESG Coordination Department / ESG coordinator – a dedicated organizational unit/person within the **Banks** which/who coordinates the process of the climate action among involved parties, identifies opportunities for improvement and provides knowledge to respective parties.

With regards to **EMS**, the **ESG** Coordination Department is responsible for technical support in all areas.

Environmental and Social Risk Management Team - a full-time unit dedicated to overseeing the Environmental and Social risk management of lending, Green Lending Procedure and Banks' Procedure for addressing External E&S Queries and Concerns. The Environmental and Social risk Management Group is part of SME and Corporate Business Credit Risk Department which reports directly to a member of the **Management Board**.

ESG Competences Center – The Task Force on **ESG** matters, consisting of representatives from different functions of the **Banks**.

10.3 Roles and Responsibilities at Group Company Level

Management Board of the Group Companies

The **Management Board** of the **Group Companies** may decide on the respective governance structure for execution of this **Policy**. Management must designate a responsible unit/function for the

Policy implementation and ensure that respective unit/function develop action plans, if deemed necessary.

TBC's environmental management system applies to all operations and services at its head offices, branches, outlets, service centers, training center, archive and warehouse and all **Group Companies**. All **Group Companies** will endeavor to assign responsible **Employees** for implementation of environmental management system within each company. The exception can be made for **Group Companies** having minimal utility consumption, using **TBC's** premises and/or having limited internal capacity of human resources. However, the **Group Companies** will be managed centrally by **TBC Bank's ESG Coordination Department** including respective data disclosure into the Annual GHG Emissions Reporting and will be supported by the Business Support **ESG** Specialist.

11. RELATED POLICIES

This **Policy** is supported by the following other policies and procedures:

- Human Rights Policy;
- Code of conduct and ethics;
- Diversity, Equality and Inclusion Policy;
- E&S risk management Procedure;
- Green Lending Procedure;
- Exclusion List of Activities
- Green Procurement Recommendations
- Waste management guideline