



ENVIRONMENTAL AND CLIMATE CHANGE POLICY



Target audience:	All relevant employees of the Group Companies		
Policy Owner (Responsible for the document):	CRO		
Units engaged in the implementation:	JSC TBC Bank ESG Coordination Department CEOs Management boards of the Group Companies		
Reviewed by:	JSC TBC Bank Legal Department TBC Bank Group PLC Executive Committee		
Approved by:	 Arne Berggren Chairperson of the TBC Bank Group PLC Board		
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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.			
Version		Date	
Previous version	2nd	25.09.2024	
Current version	3rd	10.10.2025	
Revision frequency	Annual/Ad hoc		
Accessibility	Public (Annex N1 – Internal)		
Application	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.		
Implementation	In order to implement this policy, Management adopts the relevant procedures / guidelines that should be established following the rules outlined by Subsidiary Governance Procedure.		

Definitions	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	6
4.1. Pillar I – Internal environmental measures:	6
4.2. Greenhouse gas emissions	7
4.3. Pillar II – Environmental and Social risk management of lending:	7
4.4. Pillar III – Sustainable Finance:	7
4.5. Pillar IV – External Communication:	8
4.5.1. Outgoing Communication	8
4.5.2. Incoming Communication	8
5. SOCIAL ASPECTS OF THE POLICY	8
6. CLIMATE CHANGE: RISKS AND OPPORTUNITIES	9
7. AWARENESS RAISING AND TRAINING	9
8. INTERNAL AND EXTERNAL COMMUNICATION ON CLIMATE CHANGE	10
8.1 Internal Communication	10
8.2 External Communication	10
9. MONITORING AND REPORTING	11
10. ROLES AND RESPONSIBILITIES	11
10.1 Roles and Responsibilities at TBC Level	11
10.2 Roles and Responsibilities at Banks Level	12
10.3 Roles and Responsibilities at Group Company Level	13
11. RELATED POLICIES	13
Annex 1 - Group Exclusion List	14

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. Climate risks and opportunities are key elements of the **ESG** Strategy which addresses climate change, direct and indirect environmental impact, sustainable development across **TBC**, customers, **Employees**, suppliers and society, as well as 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 a 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 Management Manual.

2. GUIDING PRINCIPLES

- 2.1. **TBC** guides 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);
 - Task Force on Climate-related Financial Disclosures (TCFD);
 - Nationally Determined Contribution (NDC);

- Paris Agreement Under the United Nations Framework Convention on Climate Change;
- NBG Sustainable Finance (SF) Taxonomy;
- NBG ESG Guidelines;
- ISO 14001:2015 Environmental Management System
- ISO 14064-1:2018 Greenhouse Gases
- Partnership for Carbon Accounting Financials (PCAF) Methodology
- NBG's Climate Stress Testing Framework

3. OBJECTIVES FOR CLIMATE ACTION

3.1. The long-term aspirations of the **Group** are supported by different measures outlined in the **ESG Strategy** which is updated regularly.

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

- Increase of the sustainable portfolio, promoting investments that generate positive environmental and social outcomes;
- Enhanced the governance of ESG and climate-related risks and opportunities, ensuring their integration into enterprise-wide decision-making processes;
- Secure access to green and sustainable financing sources, to support climate-aligned growth and innovation;
- Measure **TBCs** direct performance against the Paris Agreement targets for the reduction of GHG emissions;
- Develop and implement a comprehensive transition plan, aligned with international climate frameworks and best practices;
- Achieve net zero direct environmental impact by 2030, and continue developing a plan to reduce indirect environmental impact to net zero as soon as practicable thereafter;
- Integrate tailored sectoral transition plans and Paris Agreement alignment considerations into financial planning, to ensure climate resilience and strategic alignment; ,
- Establish an **ESG** resource center for **Employees**, customers, investors and wider public to increase awareness and knowledge about the risks and opportunities of climate change;
- Strengthen internal ESG expertise and capacity, to support effective implementation and continuous improvement.

3.3. TBC fully understands the importance of doing business with minimal impact on the environment. To this end, the Group implements an Environmental Management System (EMS) aligned with the ISO 14001:2015 standard, enabling a structured approach to managing environmental responsibilities and contributing to long-term sustainability. 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;
- Ensuring availability of resources, competence, awareness, communication, and documented information;
- Do not finance businesses that have negative effect on environment and society (Annex 1 Group Exclusion List);

- Promoting sustainability finance among our clients.

4. STRUCTURE OF ENVIRONMENTAL MANAGEMENT SYSTEM

TBC's environmental management system (**EMS**) is 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 including a 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.

The Group actively measures its direct greenhouse gas (GHG) emissions and evaluates its performance against the targets set by the Paris Agreement. Based on these assessments, TBC Group establishes a pathway aligned with the Paris Agreement scenario. All companies within the Group are required to follow the Paris-aligned pathway and implement targeted measures to reduce GHG emissions across their direct operations.

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 Environmental Management Manual, depending on the 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** and the Group Companies are subject to few legal requirements related to their environmental aspects. The Environmental Legal Register details the specific legal and other requirements applicable to the **Banks** and **Group companies** and shows how these requirements apply to the environmental aspects.

4.1.1 Greenhouse gas emissions from direct operations

TBC has established a comprehensive internal environmental system to manage its GHG emissions within the Group and is committed to reducing its GHG emissions by semi-annual monitoring consumption of fuel, gas and electricity. For more details, please refer to Annual Report: <https://www.tbcbankgroup.com/investors/results-center/>

Based on the GHG inventory results, a Greenhouse Gas Emissions Report is produced annually Group-wide and is independently verified with reasonable assurance by a third-party consulting company in compliance with the ISO 14064 International Standard for GHG Emissions Inventories and Verification. Based on the report, goals and annual action plans are being developed.

4.2. 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 the best environmental 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).

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). 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, which are unified in sector specific ESDD forms developed by the **Banks**.

4.3. 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.

Local regulatory frameworks (e.g., the Green and Social Taxonomies of the National Bank of Georgia) serve as the primary reference for defining and classifying sustainable lending. In parallel, **Banks** ensure alignment with International Financial Institutions' (IFI) standards when allocating attracted IFI fundings. Therefore, **Banks** sustainable portfolio comprises assets classified under both local regulatory frameworks and/or IFI frameworks. To ensure the credibility and transparency of these classifications, Banks have respective procedures. To further support growth of green portfolio and enhance internal capacity for the assessment of non-standard loans, IFI-aligned loans, and other green assets, internal functions can be established within **Banks'** ESG Departments.

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

4.4.1. **Outgoing Communication**

External communication (both incoming and outgoing) is handled and documented with clear responsibilities within the company. Outgoing external communication includes 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**.

4.4.2. **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.tbcbank.ge/web/en/web/guest/e-s> to the following e-mail address: E&Srisk@tbcbank.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 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 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. 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 **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 related to business customers. 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;

- Green Procurement Recommendations
- Waste management guideline

Environmental and Climate Change Policy - Annex 1 Group Exclusion List

1. Scope

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. We fully understand the importance of doing business with minimal impact on the environment. Thus, we do not finance businesses that have negative effect on environment and society.

The purpose of the Group Exclusion List is to define the list of economic activities which are excluded from financing by **the Banks**. The Exclusion List is based on the Exclusion Lists of the EBRD, IFC and DEG. The Exclusion List is incorporated in all lending procedures of the **Banks** by respective responsible departments / units.

2. List of excluded activities

2.1 **The Bank** shall not finance the production, or trade in any product or activity deemed illegal under laws or regulations of the respective local regulators or international conventions and agreements.

2.2 Without limiting the generality of the above, TBC shall not finance or approve loans in the following activities:

- a. Production or activities involving harmful or exploitative forms of forced labour¹ or child labor^{2;14}
- b. Production or trade in any product or activity deemed illegal under host country laws or regulations or international conventions and agreements
- c. Any business relating to pornography or prostitution
- d. Trade in wildlife or wildlife products regulated under CITES⁵
- e. Production or use of or trade in hazardous materials such as radioactive materials⁶, including nuclear reactor and components thereof, unbounded asbestos fibers ¹³
- f. Cross-border trade in waste and waste products unless compliant to the Basel Convention and the underlying regulations¹⁶
- g. Drift net fishing in the marine environment using nets in excess of 2.5 km in length
- h. Marine and coastal fishing practices, such as large-scale pelagic drift net fishing and fine mesh net fishing, harmful to vulnerable and protected species in large numbers and damaging to marine biodiversity and habitats
- i. Production, use of or trade in pharmaceuticals³, pesticides/herbicides⁴, chemicals, ozone depleting substances⁸ and other hazardous substances¹⁹ subject to international phaseouts or bans.
- j. Destruction⁹ of Critical Habitat¹⁰
- k. Activities prohibited by host country legislation or international conventions relating to the protection of biodiversity resources¹⁷
- l. Significant alteration, damage, or removal of any critical cultural heritage or cultural heritage¹⁹
- m. Production and distribution of racist, anti-democratic and/or neo-nazi media
- n. Production or trade in¹² weapons and munitions, including paramilitary materials ^{12;20}
- o. Production or trade in¹¹ tobacco¹²
- p. Production or trade in¹¹ alcoholic beverages (excluding beer and wine)¹²
- q. Gambling, casinos and equivalent enterprises ¹¹
- r. Production or use of or trade in products containing PCBs ⁷ and other hazardous chemicals¹⁸
- s. Production or trade in wood or other forestry products other than from sustainably managed forests
- t. Commercial logging operations or the purchase of logging equipment for use in primary tropical moist forests or old-growth forests
- u. Shipment of oil or other hazardous substances in tankers which do not comply with IMO requirements¹⁹
- v. Trade in goods without required export or import licenses or other evidence of authorization of transit from the relevant countries of export, import and, if applicable, transit

- w. Any commercial logging operations for use in primary tropical moist forest
- x. Thermal coal mining
- y. Activities involving force-feeding of ducks and geese
- z. The keeping of animals for the primary purpose of fur production or any activities involving fur production
- aa. The export of mercury and mercury compounds, and the manufacture, export and import of a large range of mercury-added products.

3. Definition of Foot Notes (for internal use only):

- 1) Forced labor means all work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty as defined by ILO Conventions.
- 2) Employees may only be taken if they are at least 14 years old, as defined in the ILO Fundamental Human Rights Conventions (Minimum Age Convention C138, Art. 2), unless local legislation specifies compulsory school attendance or the minimum age for working. In such cases the higher age shall apply.
- 3) A list of pharmaceutical products subject to phaseouts or bans is available at <http://www.who.int>.
- 4) A list of pesticides and herbicides subject to phaseouts or bans is available at <http://www.pic.int>.
- 5) CITES: Convention on International Trade in Endangered Species or Wild Fauna and Flora. A list of CITES listed species is available from the EBRD and at <http://www.cites.org>.
- 6) This does not apply to the purchase of medical equipment, quality control (measurement) equipment and any other equipment where IFC, DEG and other IFIs consider the radioactive source to be trivial and/or adequately shielded.
- 7) PCBs: Polychlorinated biphenyls, a group of highly toxic chemicals. PCBs are likely to be found in oil-filled electrical transformers, capacitors and switchgear dating from 1950-1985.
- 8) Ozone-depleting substances; Chemical compounds, which react with and delete stratospheric ozone, resulting in "holes in the ozone layer". The Montreal Protocol lists ODSs and their target reduction and phase-out dates. A list of the chemical compounds regulated by the Montreal Protocol, which includes aerosols, refrigerants, foam blowing agents, solvents, and fire protection agents, together with details of signatory countries and phase out target dates, Is available from the EBRD and at http://ozone.unep.org/new_site/en/index.php
- 9) Destruction means the (1) elimination or severe diminution of the integrity of a habitat caused by a major, long-term change in land or water use or (2) modification of a habitat in such a way that the habitat's ability to maintain its role (see footnote 8) is lost.
- 10) Critical habitat is a subset of both natural and modified habitat that deserves particular attention. Critical habitat Includes areas with high biodiversity value that meet the criteria of the World Conservation Union (IUCN) classification, including habitat required for the survival of critically endangered or endangered species as defined by the I(JCN Red List of Threatened Species or as defined in any national legislation; areas having special significance for endemic or restricted-range species; sites that are critical for the survival of migratory species; areas supporting globally significant concentrations or numbers of individuals of congregator species; areas with unique assemblages of species or which are associated with key evolutionary processes or provide key ecosystem services; and areas having biodiversity of significant social, economic or cultural importance to local communities. Primary forest or forests of high conservation value shall he considered critical habitats. [DEG]
- 11) A benchmark for substantial is 5—10% of the balance sheet or the financed volume. [DEG1]

This does not apply to project sponsors who are not substantially involved in these activities. “Not substantially involved” means that the activity concerned is ancillary to a project sponsor’s primary operations. In addition, without using any financing provided by the lenders, by the decision of Supervisory Board on ESG and Ethics committee dated 25 May, 2023 and

according to the first amendment (dated 31 July, 2023) of the Policy Agreement between Joint Stock Company “TBC Bank” and International Finance Corporation (IFC), TBC Bank shall be able to provide funding of a total of four percent (4%) of TBC Bank’s total gross loans and off-balance commitments, on the following activities: a) Under “Production or trade in alcoholic beverages (excluding beer and wine); b) Under “Production or trade in tobacco; and c) Under “Gambling, casinos and equivalent enterprises.

Total exposure (which includes loans and off-balance sheet commitments extended by the Borrower to its customers) relating to the above three categories of excluded activities shall not, on an aggregated basis, exceed a cap of 4% of TBC Bank’s total gross loan and off-balance commitments.

In Financial Institutions this is calculated with regard to the portfolio volume financing such activities. [DEG]

- 12) Financing of projects is excluded, when this activity forms a substantial part of a project sponsor's primary operations or those of the project,
- 13) This does not apply to purchase and use of bonded asbestos cement sheeting where the asbestos content is less than 20%. [IFC] [EBRD]
- 14) Harmful child labor means the employment of children that is economically exploitive, or is likely to be hazardous to, or to Interfere with, the child's education, or to be harmful to the child's health, or physical, mental, spiritual, moral, or social development. [IFC]
- 15) Reference documents are EU Regulation (EEC) No 2455/92 Concerning the Export and Import of Certain Dangerous Chemicals, as amended; UN Consolidated List of Products whose Consumption and/or Sale have been Banned, Withdrawn, Severely Restricted or not Approved by Governments; Convention on the Prior Informed Consent Procedures for Certain Hazardous Chemicals and Pesticides in International Trade (Rotterdam Convention); Stockholm Convention on Persistent Organic Pollutants; WHO Classification of Pesticides by Hazard.[EBRD]
- 16) As defined by the Basel Convention of 22 March 1989 on the control of transboundary movements of hazardous wastes and their disposal [EBRD1]. Reference documents are: Regulation (EC) No 1013/2006 of 14 June 2006 on shipments of waste: Decision C(2001)107/Final of the OECD Council concerning the revision of Decision C(92)39/Final on the control of transboundary movements of wastes destined for recovery operations.
- 17) Relevant international conventions include, without limitation; Convention on the Conservation of Migratory Species of Wild Animals (Bonn Convention); Convention on Wetlands of International Importance, especially as Waterfowl Habitat (Ramsar Convention); Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention); World Heritage Convention; Convention on Biological Diversity. [EBRD]
- 18) A list of hazardous chemicals is available at <http://www.pic.int>.
- 19) This includes: tankers which do not have all required MARPOL SOLAS certificates (including, without limitation, ISM Code compliance), tankers blacklisted by the European Union or banned by the Paris Memorandum of Understanding on Port State Control (Paris MOU) and tankers due for phase out under MARPOL regulation 130. No single hull tanker over 25 years old should be use. [EBRD]
- 20) Transactions under this category are not eligible for ADB Financing.