Businesses and sustainability ESG principles guide



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Introduction

Introduction

The implementation of sustainability principles in business is one of the most significant changes for the business sector in recent years. However, it is also a challenge that banks face together with their clients. Sustainability in business is becoming the new standard, the adoption of which will largely determine the future financial performance of businesses.

The role of the banks in the transition to a low-carbon economy is to guide their clients on the path to meeting their ESG goals, but most importantly, to finance their sustainable investments.



By assessing ESG risks, banks protect their clients' assets and by financing green investments reduce not only the client's, but also their own carbon footprint. We need each other to achieve sustainability. Companies, banks, the public sector and consumers. None of the activities in this area are useless. Any piece of information that helps increase the level of ESG awareness is valuable. Only by working together can we achieve our goals and move from declarations to actions. However, this will require substantial funding, know-how, and a strong commitment to ESG issues. We offer all this to you, our clients. It is my hope that this guide will help you to navigate the ESG landscape, set your ESG goals and a find a path to achieving them.

I look forward to us walking this path together.

Zuzana Koštialová

Board Member at Tatra banka responsible for corporate and private banking and capital markets



Sustainability as a global objective

Sustainability as a global objective

Sustainable development of our society has become one of the main objectives in most countries around the world. At its core, it is about **meeting the needs of the present generation without compromising the ability of future generations to meet their needs**.

Sustainability does not automatically imply halting our development or causing an immediate reduction in economic growth. However, to achieve sustainable development, it is necessary to reconcile fair economic growth with environmental protection, as well as considering social aspects.

The <u>2030 Agenda for Sustainable Development</u>, adopted by the Member States of the United Nations (UN) in 2015, is a core document defining global priorities and targets for sustainability.

The 2030 Agenda defines **17 Sustainable Development Goals** (SDGs) in three areas: **environmental, social and governance**. These three dimensions, captured by the acronym **ESG (environmental, social, governance)**, are considered the **three pillars of sustainability**.

17 Sustainable Development Goals





Sustainability in the European Union

The European Union (EU) implements the principles of sustainable development, along with the key aspects of the **Paris Agreement**, via progressive legislation.

The primary sustainability documents adopted by the European Union are:

- The European Green Deal, defining the commitment of the EU to reducing greenhouse gas emissions by 55% by 2030 compared to 1990 as well as achieving climate neutrality by 2050, and the
- Action Plan on Financing Sustainable Growth, aiming to build a framework for sustainable investment and promoting transparency in the economy.

• What is climate neutrality?

Climate neutrality means zero **NET emissions**, i.e. achieving a balance between the emissions of greenhouse gas produced and absorbed.

It does not mean producing zero emissions, as is often misinterpreted. Forests, soils, and oceans act as natural sinks for greenhouse gases. However, their capacity to absorb all the emissions produced is currently insufficient.

We are yet to invent efficient and affordable technologies for absorbing greenhouse gases.



Sustainability and businesses

ESG in corporate business

Sustainability and its three pillars (environmental, social and governance) also applies to businesses. The individual pillars of sustainability for a business are represented as follows:



on the environment, e.g. through emissions, waste and water management, but also the impact of the changing environment on the business the impact of the business **on the society**, e.g. on customers, communities, but also on its employees and business partners corporate governance, the degree of transparency in management, as well as preventing corruption and collusion

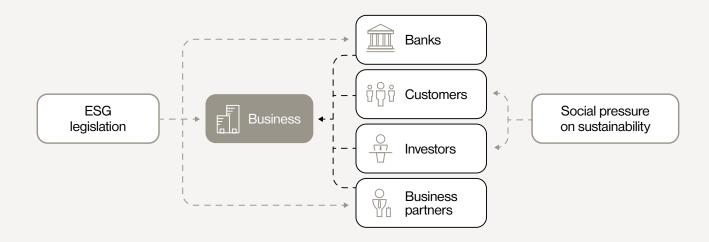
Why businesses should care about sustainability

The European Union's sustainability objectives concern individuals and countries, as well as businesses. Businesses and their activities are one of the primary factors affecting the environment and the society as a whole. Without the involvement of business, it will be impossible to achieve sustainability in our economy and to move from linear to circular economy.

ESG principles are implemented into economies through legislation, and the **impact** of ESG legislation on the operation of businesses can be observed:

- **DIRECTLY** through the **direct ESG legislative obligations** of the business,
- INDIRECTLY through the interactions between the business and the investors, banks, business partners and customers, whose relationship with the business or the demands placed on it influence their own legal obligations. At the same time, businesses are also indirectly affected by the society's pressure to behave more sustainably in general.





Investors

- They assess the ESG performance of the business, which becomes one of the key performance indicators (KPIs) in the evaluation of businesses.
- They assess how the business manages ESG risks, as better management and elimination of ESG risks indicates better financial performance for the business in the future.

Business partners

- They assess the ESG performance of their business partners to optimise their own ESG performance, e.g. for non-financial reporting purposes or to accomplish their own ESG objectives.
- As part of their non-financial reporting, they have to report on the impact of their own activities on the environment and society, as well as on the impact of the entire value chain of the business (including the activities of its suppliers).



Banks

- The obligation to implement ESG factors in credit and risk policies, as well as in lending practices, stems from banking regulations.
- When lending to businesses, banks conduct ESG assessment at two levels: an assessment of the ESG performance of the client, and an assessment of the transaction they are financing for the client.
- Banks have a non-financial reporting obligation, which includes the obligation to report ESG data on their clients.

Customers

- Business clients may also have non-financial reporting obligations, where they might need to consider the ESG performance of suppliers in their purchasing decisions to optimise their own ESG impacts.
- According to most consumer surveys, individual consumers are increasingly taking ESG factors into account in their purchasing decisions.



Mandatory sustainability

reporting by businesses

Mandatory sustainability reporting by businesses

Mandatory reporting of non-financial data by businesses was introduced into practice in Europe by the **Non-Financial Reporting Directive (NFRD)**.

Under this directive, large businesses with more than 500 employees as well as public interest entities are required to report non-financial data. However, the directive does not contain specific standards for reporting, which has often led to poor quality of the reported data, making it impossible to compare. The need to establish precise disclosure rules and thus produce a sufficient level of relevant, comparable and comprehensible data has led to the adoption of the new **Corporate Sustainability Reporting Directive (CSRD)**.

The CSRD replaces the NFRD and at the same time expands the number of entities subject to the reporting requirements from approx. 11,000 European companies to approx. 49,000 businesses.

OBLIGATION	метнор	WHAT IS SUSTAINABLE
to produce a structured report on the business activities in the field of sustainability comes from the European Corporate Sustainability Reporting Directive (CSRD) .	of how to report, and the requirements for the scope of reporting, are included in the <i>European</i> <i>Sustainability Reporting</i> <i>Standards (ESRS)</i> .*	for reporting purposes, including technical criteria for individual activities, is defined by the <i>EU Taxonomy</i> .

* Only drafts of the standards are currently available, with final approval expected in 2023.



Corporate Sustainability Reporting Directive (CSRD)

- It introduces an obligation for businesses to produce structured reports on their sustainability activities, or on all three pillars of sustainability – environmental, social and governance.
- This has been transposed into national legislation through an amendment to the **Act on Accounting** (the amendment is effective from 1.6.2024).
- The disclosure of sustainability data will take the form of a sustainability report, which will be part of the annual report by businesses, and must include data following the structure defined in the ESRS guidelines.
- The sustainability report must be verified by a third party (limited assurance), and machine-readable for further processing of the reported data.

The sustainability report according to the proposed ESRS standards will include the following sections:

- 1. general information
- 2. environmental information
- 3. social information
- 4. corporate governance information
- 5. information according to Article 8 of the EU Taxonomy (see the EU Taxonomy chapter)

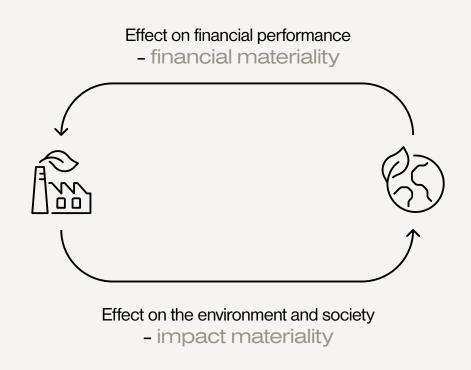
The basic principle of reporting under the CSRD is the principle of double materiality.

Double materiality means that for reporting purposes, businesses must simultaneously examine:

- the effect of the external environment on the business (financial materiality) AND
- the effect of the business on the external environment (impact materiality)



Using double materiality analysis, businesses define what topics are important for them. These topics must then be included in their sustainability reports. This process is called **materiality assessment**.



The schedule for the publication of sustainability reports under the CSRD

Year 2025 (report for 2024):

Businesses with more than 500 employees and public interest entities as defined by the Act on Accounting, previously covered by the NFRD.

Year 2026 (report for 2025):

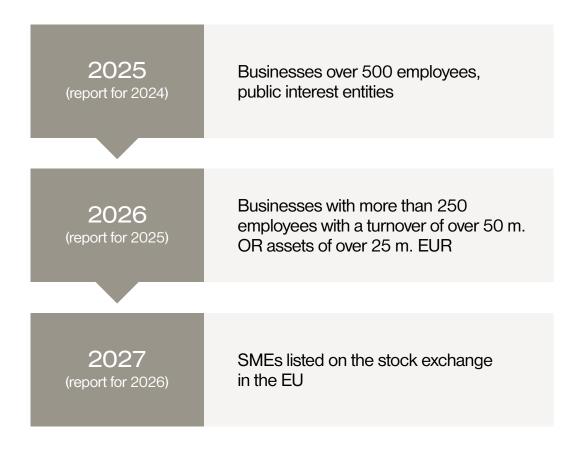
Large businesses meeting at least two of the following criteria: a) more than 250 employees and either b) a net turnover of more than EUR 50 million or c) assets of more than EUR 25 million.

Year 2027 (report for 2026):

SMEs listed on the stock exchange in the EU. However, businesses falling into this category can likely apply for a deferral of the obligation for one year in justified cases.



Unlisted SMEs are provisionally **not required** to report their sustainability data under the CSRD. However, it is likely only a matter of time before the above obligation becomes applicable to these businesses.



European Sustainability Reporting Standards (ESRS)

- These are the CSRD standards for reporting sustainability.
- Businesses required by the CSRD to disclose their sustainability data must do so using the structure provided by the ESRS.
- The standards contain 12 documents, two of which are general-purpose and the remaining ten are split according to the E, S and G domains.



Overview of currently published ESRS draft standards

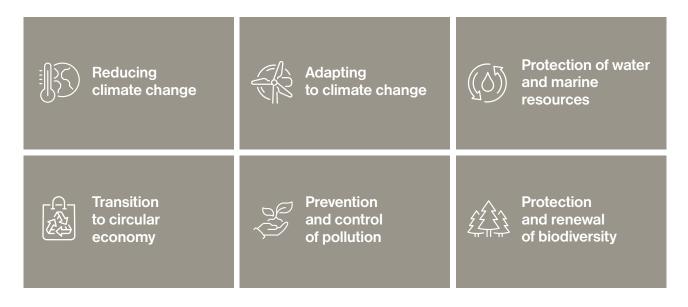
General requirements	 General principles (ESRS 1) General information on the strategy, oversight and management of impacts, risks and opportunities (ESRS 2)
Environmental disclosures	 Climate change (ESRS E1) Pollution (ESRS E2) Water and marine resources (ESRS E3) Biodiversity and ecosystems (ESRS E4) Resource use and circular economy (ESRS E5)
Social disclosures	 Own workforce (ESRS S1) Workers in the value chain (ESRS S2) Affected communities (ESRS S3) Consumers and end-users (ESRS S4)
Disclosures on management	 Business conduct (ESRS G1)

The ESRS guidelines are available <u>here</u>.



EU Taxonomy

- It is a classification system that defines which economic activities can be considered environmentally sustainable, i.e. green.
- The Taxonomy Regulation defines **6 environmental objectives** to which the defined economic activities are obliged to make a significant contribution:



Environmentally sustainable ("green") economic activities must meet all the following conditions:

making a significant contribution to one or more environmental objectives,

not significantly undermining any of the remaining environmental objectives (the "do no significant harm" principle),

conducted in accordance with minimum social standards on human rights
and labour law,

meeting the technical criteria defined in the Delegated Regulations of the EU
 Taxonomy.



Data according to Article 8 of the EU Taxonomy:

The Taxonomy Regulation introduces new **reporting obligations** for businesses. One is the publication of key performance indicators (KPIs) based on the Green Asset Ratio:

- the ratio of sustainable activities to the total turnover of the business,
- the ratio of sustainable activities to capital expenditure (CapEx),
- the ratio of sustainable activities to operational expenditure (OpEx).

The purpose of the indicators is to inform investors and other stakeholders how sustainable the business model is and what the company is doing to improve its environmental sustainability.

The EU Taxonomy Regulation is available here.



ESG risks and their effect on business profit

ESG risks and their effect on business profit

Adapting to climate change and its consequences in the period ahead will be one of the main challenges facing countries, individuals, as well as businesses. Double materiality is therefore a fundamental principle in reporting sustainability data. Its principles include:

- assessing the impact of the business on the environment and society, but also
- assessing the impact of climate change and social attitudes on the future operations and performance of the business.

ESG risks businesses should consider when creating their ESG strategy for assessing their impact include:



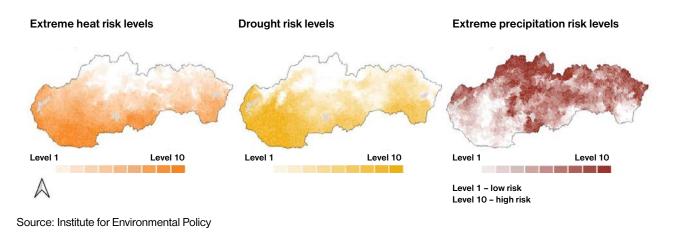
Physical risks

are risks directly resulting from climate change, including the risk of floods and landslides, hurricanes and extreme storms, heat waves, droughts, and forest fires.

According to the <u>analysis of the Institute for Environmental Policy (IEP) at the</u> <u>Ministry of Environment of the Slovak Republic</u>, the most significant climate threats in Slovakia include:

extreme heatextreme precipitationdrought

Climate threat risk levels for Slovakia:



The south of Slovakia, including the capital Bratislava, is the most at risk from extreme heat. The most at-risk districts include Bratislava I, Komárno and Nové Zámky, while Šaľa, Lučenec and Rimavská Sobota districts are also high-risk. More than 16% of the population of Slovakia lives in the areas with the highest risk of extreme heat.

Droughts pose a significant risk to **districts in the south-west of Slovakia**, **including Žitný ostrov**, which is an important agricultural area and country's largest reservoir of drinking water. Droughts can thus directly threaten the country's water supply and food security. The districts with the highest threat level include Bratislava II, Senec and Bratislava V.

The threat of **extreme precipitation** is concentrated mainly in the north of the country, with the districts of Tvrdošín, Dolný Kubín and Kysucké Nové Mesto being the most at-risk.

Transition risks

arise primarily from changing market conditions, including investor and consumer sentiment, legislation and regulation, and the emergence of new technologies. Both transition and physical risks should be factored into the ESG strategy of businesses. Failure to adapt to these changes could mean loss of investors, business opportunities, and a direct threat to the future viability of the business.



Decarbonisation

and businesses

Decarbonisation and businesses

Decarbonisation is the process of gradually reducing greenhouse gas emissions into the atmosphere.

Our decarbonisation targets were set by the <u>European Green Deal</u>, through which the EU has committed to:

- reducing greenhouse gas emissions by 55% by 2030 compared to 1990,
- achieving climate neutrality for the European Union by 2050.

The European Green Deal also implements commitments made in the EU under the Paris Climate Agreement, representing the UN action plan to reduce global warming.

Under the Paris Agreement, countries agreed to:

- keep global average temperature increase well below 2 °C compared to pre-industrial levels,
- seek to reduce this increase to 1.5 °C.

What are greenhouse gasses?

Greenhouse gases absorb the sun's heat radiating from the Earth's surface, trapping it in the atmosphere and preventing it from escaping into space. The greenhouse effect keeps the Earth's temperature higher than it would be without greenhouse gases, which significantly aids in sustaining life on our planet.

Without greenhouse gases, the Earth's average temperature would be very low; only around -18 °C.



Many greenhouse gases occur naturally in the atmosphere, but human activity makes a significant contribution to their excessive concentration. The consequence of this excessive accumulation is an increasing greenhouse effect in our atmosphere and climate change, manifested by rising average temperatures and extreme weather events such as heat waves, floods, and hurricanes.

Carbon dioxide emissions, which are currently responsible for around 80% of the EU's greenhouse gas emissions, are the main target for measurement and reporting.

However, the Paris Climate Agreement includes the following 7 greenhouse gases:

Carbon dioxide (CO ₂) – fossil fuel combustion	 Methane (CH₄) – coal, oil, and gas production – agriculture, livestock, municipal solid waste landfills
Nitrous oxide (N₂O) – forestry, fisheries, agriculture	Hydrofluorocarbons (HFC) business operations automotive industry
Saturated hydrofluorocarbons – industrial production processes	Sulfur hexafluoride (SF ₆) – electrical isolation
Nitrogen trifluoride (NF₃) – production processes	

Source: European Parliament, World Meteorological Organization



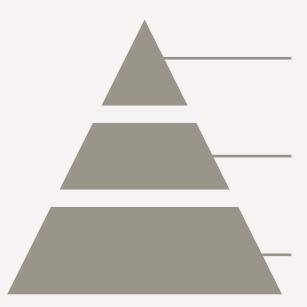
Decarbonisation and emissions of industries

Decarbonisation of businesses and industries means actively **reducing direct and indirect emissions** produced by industrial production or business activities.

Effective tools that promote decarbonisation include support for investments in low-carbon and energy-efficient projects, upgrading technologies in production or processing, changes in technological processes, and electrification.

In order to successfully define a decarbonisation strategy, it is essential for businesses to understand their sources of direct emissions, as well as the indirect emissions generated within their value chain.

The most widely used **international standard for measuring and reporting carbon footprints is the** <u>Greenhouse Gas (GHG) Protocol</u>, which splits emissions into three categories:



SCOPE 1

Direct emissions produced from sources directly owned and controlled by the organisation.

SCOPE 2

Indirect emissions from generating electricity purchased and used by the organisation.

SCOPE 3

Indirect emissions produced in the value chain of the business. These emissions typically constitute the largest proportion of an organisation's carbon footprint, and are the most difficult to measure and control.

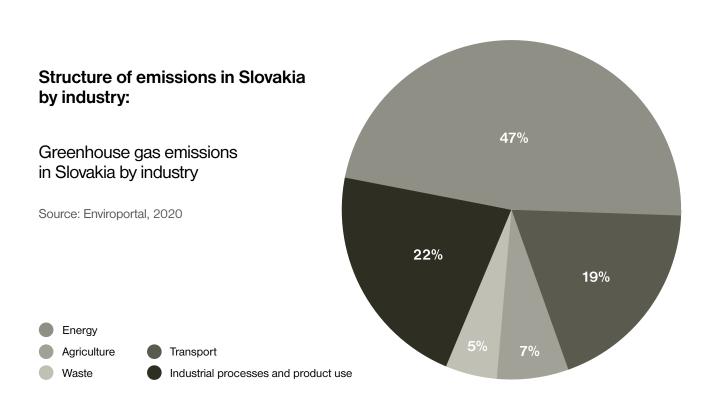


Scope 3 emissions are broadly divided into **Upstream**, including the processes of product creation from the extraction of the raw mineral materials to the actual production, and **Downstream**, including emissions generated during storage, distribution, and product end-of-life.

The ratio of emissions depends on the organisation's business. Industrial sectors and the automotive industry in particular are heavily represented in Scope 1 and 2 emissions. Financial services (banks), on the other hand, produce the largest volume of emissions in Scope 3, which is directly related to their business activities and investments.

The GHG Protocol offers several methodological procedures:

- The Corporate Accounting and Reporting Standard is widely used by large businesses, providing them with a basic framework for reporting Scope 1 and 2 emissions,
- The Corporate Value Chain (Scope 3) Standard allows companies to assess the volume of emissions generated in their value chain, and
- The Product Life Cycle and Reporting Standard is particularly suitable for manufacturing businesses, allowing them to assess the emissions generated within the life cycle of a specific product.



ESG from a banking perspective

ESG from a banking perspective

Sustainability is a core issue in the banking sector. Sustainability and ESG are addressed by the banks along two lines.

As a business, banks have similar ESG and sustainability responsibilities and implement similar measures as its clients and other businesses of the same size. This includes, for instance, the obligation to report sustainability data and the underlying data collection.

However, banks are first and foremost financial institutions with a specific line of business governed by additional legislative and regulatory ESG obligations that do not apply to other entities outside the banking sector.

ESG norms and regulations are a set of standards that banks must comply with to ensure that they operate prudently from an ESG perspective, and protect their customers' deposits against ESG risks. One of the purposes of this regulation is to ensure an appropriate proportion of sustainable assets held by the bank, and thus fulfil the **banks' primary sustainability role** in **financing sustainable investments of their clients**.

Sustainable assets are also important for banks regarding their carbon footprint, as the **carbon footprint of banks** is primarily made up of indirect emissions reported under Scope 3 emissions, i.e. mainly **emissions from investments**, which include loans.

Banks are therefore unable to reduce their carbon footprint without the credit customers also reducing theirs. For that reason, collecting data on credit clients and their carbon footprint is an important tool for managing and planning the reduction of the banks' carbon footprint.

Key ESG standards and regulations include:

Disclosure requirements

Banks are required to disclose information about their ESG performance and their governance practices. This information can be used by regulators and investors to assess the bank's environmental, social and governance performance. The Corporate Sustainability Reporting Directive (CSRD) is one example of this, mandating the banking sector to report its sustainability data in the first category of businesses covered by the Directive.



Risk management

The European Banking Authority (EBA) has published guidelines on the management and oversight of ESG risks for credit institutions and investment firms. The guidelines provide common definitions of ESG risks and elaborate on the measures, processes, mechanisms, and strategies institutions need to implement to identify, assess and manage ESG risks. The EBA recommends that institutions integrate ESG risks into their business strategies, governance and risk management, and that regulatory authorities consider ESG risks in their oversight activities. The guidelines are an important step in integrating ESG risks into the financial system, and will help ensure that institutions are prepared for the challenges posed by climate change and other related ESG risks.

Banks are required to manage ESG risks, which includes identifying and assessing their ESG risks, developing strategies to mitigate them, and reporting on ESG risks to stakeholders, such as investors and regulators. One of the obligations of banks in the area of ESG risk management is to disclose information on the bank's ESG risks under **Pillar 3 of the Basel Accords**.

The first set of Pillar 3 ESG risk disclosures published by Tatra banka in 2023 is available <u>here</u>, in Article 449a.

Investment criteria

Banks are also obliged to take ESG criteria into account for the so-called sustainable investments. This includes investing in companies that have a positive impact on the environment, society, and governance. In this regard, banks are bound by the European Sustainable Finance Disclosure Regulation (SFDR), requiring financial market participants to disclose information on how they integrate ESG factors into their investment decisions. The SFDR regulation was adopted in 2019 and came into force in 2021. This regulation requires financial institutions to disclose information about their policies and practices they consider when making investment decisions.

The implementation of ESG standards and regulations is a complex and challenging process for banks. However, it is an important step towards ensuring that banks operate in a sustainable and responsible way, protecting their customers' deposits against the new types of risks caused by climate change and shifts in social attitudes towards sustainability.



Data as a challenge

Over 600 reporting frameworks, together with a rapidly changing legislative environment, make the issue of ESG extremely complex, often perceived by businesses as difficult to comprehend. Clarity and simplicity on the issue can only be achieved by having relevant data, the lack of which is currently considered a major barrier preventing businesses and banks from properly implementing sustainability-related activities.

However, ESG regulation applies to banks even despite the lack of data on the market, which means that financial institutions often have to rely on estimates and data models. The implementation of the CSRD introduces the obligation for businesses to disclose their sustainability data, contributing to greater data transparency and a reduction in the risk of greenwashing.

Collecting data from clients is crucial for banks to meet their ESG obligations. However, the data helps not only the banks, but especially their customers.

Advantages of data collection for businesses

- informing decision-making: ESG data can help businesses, their investors and other stakeholders make more relevant decisions regarding investments and business operations;
- risk reduction: accurate data can help identify and mitigate risks associated with environmental, social and governance challenges. Evaluating ESG risks and their impact on business is one of the integral parts of assessing the double materiality in sustainability data reporting;
- increased transparency: publishing ESG data can improve transparency and corporate social responsibility. This is also linked to an improved reputation through its positive impact on brand image and eliminating possible accusations of greenwashing;
- attracting investors: ESG data combined with financial statements can help win investors who want to invest in socially responsible and sustainable business. This is because the ESG performance of businesses is expected to have a direct impact on profitability and the investors' future return on investment.



Sustainability and Tatra banka

Sustainability and Tatra banka

The social value of businesses is viewed based on the way they treat the environment in which they conduct their business. Sustainability is not just about meeting legislative and regulatory obligations. It should also guide businesses in their value chain.

Tatra banka wants to set an example for its clients and partners by implementing elements of sustainability in its business and operations, as well as in relationships with its employees, and the society and communities where it operates.

In terms of **operational matters**, Tatra banka uses an environmental management system in accordance with the ISO 14001 standard on all its premises. The operations use renewable energy sources guaranteed by the current energy provider. In 2022, the bank was able to effectively reduce the amount of municipal waste generated, thanks to improved employee awareness of waste sorting. This year has seen the introduction of an organic waste collection system at the Bank's HQ, reducing the volume of municipal waste by 75%. We use only recycled paper for printing documents, and have similarly stared using recycled wipes and eco-friendly cosmetic products. In line with the principles of sustainability, we use large-volume, reusable packaging for coffee. A green roof with two beehives contributes to the well-being of our employees at the workplace.

The bank extends sustainability beyond its direct sphere of influence. It has extended the principles of responsible business to its supply chain, as well as introduced an ESG approach to its evaluation matrix used for the selection of larger suppliers, also considering environmental and social criteria. Tatra banka is likewise committed to environmentally friendly actions in the area of transport, reducing its carbon footprint by using electric cars. The bank owns 4 fully electric cars and 8 hybrid cars. In 2022, the bank's employees drove nearly 39,000 kilometres in fully electric cars.

In addition to environmental actions, the Bank's behaviour also has a strong **social dimension**. Tatra banka and the Tatra banka Foundation have been supporting art, education and digital technologies since their establishment.

Art	26 years of the	General partner:
	Tatra banka Foundation Art Award:	Slovenské národné divadloSlovenská národná





This social dimension also extends to employees, whom the bank sees as the indispensable essence of corporate philanthropy. Volunteering during business hours with wage reimbursement, as well as donations, are an essential part of its activities.

The **Viac pre regióny** (More for the Regions) employee grant programme supports projects of non-profit organisations nominated by Tatra banka Group employees, who also participate in the projects as volunteers. The bank's employees also have an opportunity to take part in the **Naše Mesto** (Our Town) initiative – the largest corporate volunteering event in Slovakia since year one. Worth mentioning is also the **Prvá pomoc** (First Aid) grant programme by the Tatra banka Foundation, intended for employees and their immediate family members finding themselves in difficult life situations. Blood donations under the name **Krvná banka** (Blood Bank) have been organised by the bank together with the National Transfusion Service of the Slovak Republic for 12 years now.

Part of responsible business conduct for the Tatra banka Group includes adherence to the ethical principles enshrined in our Principles of Ethical Behaviour document.



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