

UNEP FI PRB Reporting and Self-Assessment Report



Principles for Responsible Banking



This is Zenus Bank first PRB Self-Assessment Report showing the progress implementing the Principles.



Principle 1: Alignment

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

1.1 Business model

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

Response:	Links and references
Zenus Bank is a US digital bank, using award-winning technology to enable individuals and businesses in over 130 countries to open a US bank account online without the need to be a US citizen, resident or a US registered company, giving access to the security, freedom and convenience of US banking.	(incl. pages)
Zenus offers retail accounts with services that includes Wire, ACH and P2P transfers, Debit Cards and foreign exchange services. Currently Zenus Bank has 621 clients in 93 countries. Zenus is currently on a start- up phase and plans to increase the services to, business, commercial and corresponding banking in the future. Retails accounts constitute at the moment 100% of the banks accounts with our main markets been United States 8.36%, Colombia 7.72%, India 7.23%, Germany 6.27%, Argentina 6.11%, Turkey 5.63%, United Kingdom 5.47% and Mexico 3.54%.	
Next year Zenus will be extending the products to offer B2B and B2B2C services globally to financial institutions and non-financial institutions.	



1.2 Strategy alignment

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

🛛 Yes

🗆 No

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

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

UN Guiding Principles on Business and Human Rights

□ International Labour Organization fundamental conventions

UN Global Compact

□ UN Declaration on the Rights of Indigenous Peoples

□ Any applicable regulatory reporting requirements on environmental risk assessments, e.g. on climate risk - please specify which ones: ------

□ Any applicable regulatory reporting requirements on social risk assessments, e.g. on modern slavery - please specify which ones: ------

⊠ None of the above

Response:	Links and references
Zenus Bank is a digital native infrastructure bank that enables USD accounts for natural persons, businesses of all sizes, and financial institutions. Zenus platform has supported customer onboarding in over 90 countries and helped non-US residents, non-US companies, and non-US financial institutions harness the power of a USD account for payments and commerce. Zenus is impacting global economic prosperity through real-time risk management strategy, account, and transactional services APIs that allow FinTech's, banks, and broker- dealers to offer their customers a USD account, Visa Infinite Card, FX services, and cross-border payments.	
Currently, Zenus Bank has 621 clients in 93 countries. Retail accounts constitute 100% of the bank accounts, with our main markets being Colombia 7.78%, the United States 6.83%, India 6.67%, Germany 5.24%,	



Argentina 6.03%, Turkey 5.56%, the United Kingdom 5.87% and Mexico 3.97%. To scale our product in more countries and to service more people next year, Zenus will extend the products to offer B2B and B2B2C services globally to financial and non-financial institutions.

Principle 2: Impact and Target Setting

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

2.1 Impact Analysis (Key Step 1)

Show that your bank has performed an impact analysis of its portfolio/s to identify its most significant impact areas and determine priority areas for target-setting. The impact analysis shall be updated regularly¹ and fulfil the following requirements/elements (a-d)²:

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

Response:	Links and references
We used the UNEP FI Impact Analysis tool V2 to conduct our impact analysis, and we collected the information by creating dashboards demonstrating our customer demographics and other vital data.	
We analyzed our retail portfolio of USD accounts, which offers a Visa debit card, Foreign Exchange (FX) and cross-border payment services (SWIFT) in over 90 countries. The analysis does not cover our corporate and B2B2C portfolios.	
The major countries we provide services to are Colombia, Argentina, Mexico, Turkey, India, and the Dominican Republic, impacting 10.78% of female consumers and providing access to dependent employees, business owners, and students.	

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

² Further guidance can be found in the <u>Interactive Guidance on impact analysis and target setting</u>.



 <u>b)</u> Portfolio composition: Has your bank considered the composition of its analysis? Please provide proportional composition your portfolio globall geographical scope i) by sectors & industries³ for business, corporate and investment bankin sector exposure or industry breakdown in %), and/or ii) by products & services and by types of customers for consumer and reportfolios. 	y and per ng portfolios (i.e.
If your bank has taken another approach to determine the bank's scale of exercise elaborate, to show how you have considered where the bank's core busines in terms of industries or sectors.	
Response:	Links and references
Currently, our bank portfolio is 100% retail accounts. We will launch our corporate and B2B2C services in the fourth quarter of 2023. We intend to provide our B2B2C and corporate services to the 93 countries that our retail portfolio entails and keep our current trend in the countries we are providing services.	
Our B2B2C portfolio will provide financial and non-financial institutions with a white label of our banking app where they can offer our USD bank account to consumers in their jurisdiction. As a result, our B2B2C portfolio will be more accessible to the underserved and will impact the SGDs of Gender Equality (5), Decent Work and Economic Growth (8), and Reduce Inequalities (10).	
We will continue to measure our impact on female entrepreneurs, business owners, and students and include our ability to protect our customers from sudden financial shocks.	
<u>c)</u> <u>Context:</u> What are the main challenges and priorities related to sustainable main countries/regions in which your bank and/or your clients operate? ⁴ these have been considered, including what stakeholders you have engage element of the impact analysis.	Please describe how
This step aims to put your bank's portfolio impacts into the context of society's n	eeds.
Response:	Demirgüç-Kunt, A.,

Response:	Demirgüç-Kunt, A.,
	Klapper, L., Singer,
As Zenus Bank operates on a global scale, we determine that the most	D., Ansar, S., (2021)
relevant challenges and priorities on which Zenus Bank can have a real	Financial Inclusion,

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

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



impact are Financial Inclusion, Financial Health, and gender equality. For that reason, the unbanked individuals, unbanked women, business owners and economic stability are our prioritize groups.

Per "The Global Findex Database," 29% of adults in developing economies do not have a formal financial account. In addition, there is a 6% gap between men and women in developing countries. Globally 13% of women are unbanked. For example, in Turkey, 71% of unbanked adults are women.

Digital accounts help adults mitigate the consequences of financial shocks. During the Covid 19 pandemic, many adults reported that digital accounts helped them during the crisis by receiving deposits from social programs. Digital payments also help increase transparency reducing the scope of corruption.

Our business strategy directly helps overcome the identified challenges. Zenus Bank is capable of offering digital accounts globally and helping adults build stronger financial resilience by allowing them to receive wages and social program benefits and have accessibility to a Visa debit card.

We have engaged with payment networks such as Visa and Swift and payment providers including JP Morgan and Convera. These products helps Zenus Bank to looks to offer local Financial Institutions a white label of our banking services.

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

Response:	Links and references
The Bank identified that our services can improve Financial Inclusion, Financial Health and Gender Equality on a global scale. Our unique banking license permits Zenus to provide a digital USD account, accept, deposits and make payments globally. The license has permitted us to engage counterparties to provide services such as Swift, Visa, FX services.	
Zenus Bank, not having to deal with geographical barriers, allows to offer bank accounts to underbanked individuals globally. Having a USD account	

Digital Payments, and Resilience in the Age of COVID-19. The Global Findex Database 2021

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



also facilitates access to other financial services such as investments, insurance, pensions plans among others.

One of the main challenges that we have identified to achieve financial inclusion is finding a solutions for unbanked individuals that lack funds or documentation to open an account.

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

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

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

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

Response:

Zenus Bank currently has 651 clients in 96 countries, of which 10.60% are women. 100% of our client portfolio have access to a USD account, Swift, and FX services, while 54.53% of our clients have a Visa debit card. 41.63% of our portfolio is self-employed, of which 7.01 are women. 34% of our client base is from the top 10 underbanked countries.

These performance measurements serve as a baseline as we are currently in a start-up phase. This baseline serves as proof of concept to see the possibilities of impacts that we can achieve through our business model.

We expect that by the end of 2023 to have exponential growth in clients and products offering. We developed dashboards that collect data based on countries (urban and rural), vulnerable groups, industries, gender, occupations, income, and transactions such as amounts of transactions, location of originating funds, location of receiving funds, where debit card payments are made and the type of services paid, for example, Uber, Netflix, and Amazon, among others, to capture the data required to measure our performance. Ventura L., 2021. The Global Finance World's Most Unbaked Countries 2021 retrieved from (https://www.gfma g.com/globaldata/economicdata/worlds-mostunbanked-countries)



We plan to continue expanding our services through our B2B and B2B2C product and will add other financial services through our embedded banking platform.

Self-assessment summary:

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

- Scope: Yes ⊠, In progress □, No □
- Portfolio composition: Yes ⊠, In progress □, No □
- Context: Yes ⊠, In progress □, No □
- Performance measurement: Yes □, In progress □, No ⊠

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

Financial Inclusion, Financial Health & inclusion and Gender Equality.

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

 \boxtimes Up to 6 months prior to publication \square Up to 12 months prior to publication \square Up to 18 months prior to publication \square longer than 18 months prior to publication

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

2.2 Target Setting (Key Step 2)

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

The targets⁷ have to be Specific, Measurable (qualitative or quantitative), Achievable, Relevant and Time-bound (SMART). Please disclose the following elements of target setting (a-d), for each target separately:

a) Alignment: which international, regional or national policy frameworks to align your bank's portfolio with⁸ have you identified as relevant? Show that the selected indicators and targets are linked to and drive alignment with and greater contribution to appropriate

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

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

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



table:

Sustainable Development Goals, the goals of the Paris Agreement, and other relevant international, national or regional frameworks. You can build upon the context items under 2.1.

Response:	Links and references	
We establish our baseline using in-house tools to measure financial inclusion, financial health, and gender equality indicators. Our initial results show that we may impact underbanked, formerly banked, small and medium enterprises, and female-led enterprises. Our targets are driven by SDG 5 (Gender Equality) and SDG 10 (reduced Inequalities) and will be enhanced and aligned with data retrieved from Financial Inclusion Support Framework (FISF) by the World Bank Financial Inclusion initiative.	https://www.worldb ank.org/en/topic/f inancialinclusion/b rief/financial- inclusion-support- framework	
 b) Baseline: Have you determined a baseline for selected indicators and assessed the current level of alignment? Please disclose the indicators used as well as the year of the baseline. You can build upon the performance measurement undertaken in 2.1 to determine the baseline for your target. 		
A package of indicators has been developed for climate change mitigation and fi inclusion to guide and support banks in their target setting and implementation j		

indicators can be found in the <u>Annex</u> of this template. If your bank has prioritized climate mitigation and/or financial health & inclusion as (one of) your most significant impact areas, it is strongly recommended to report on the indicators in the Annex. Please include the relevant indicators using the indicator code in the following

Impact area	Indicator code	Response
Climate change		

Impact area	Indicator code	Response
Financial health	B 1.1, B 2.1, B 3.1	2023
Financial Inclusion	C 2.1, C 4.1, B 3.1	2023



Response:	Links and references
As Zenus is on the startup phase, we developed tools to capture the necessary data to determine a baseline and assess the identified indicators on the year 2023. In 2023 we will launch our provide embedded banking and corporate account services on the fourth quarter of 2023. We expect exponential growth with these services. Our baseline will be established the first after launching the embedded banking and corporate account services.	
c) SMART targets (incl. key performance indicators (KPIs) ⁹): Please disclose the first and your second area of most significant impact, if already in place (a impact areas, if in place). Which KPIs are you using to monitor progress to target? Please disclose.	as well as further
Response:	Links and references
Zenus Bank launched in 2022, and we will establish a baseline for Principle Responsible Banking in 2023. For each of our Financial Inclusion and Financial Health impact areas, we look to reach and/or maintain 10% for each identified KPI. After 2023 we will review our performance and update bur goals. We will measure the increase in underbanked and formerly banked clients, women accounts, entrepreneurs, and SMEs. We will provide embedded banking and corporate account services to 96 countries in which we have a presence. We will measure our impact through the embedded banking service following the same approach as our retail and commercial account services.	
 Action plan: which actions including milestones have you defined to meet Please describe. Please also show that your bank has analysed and acknowledged signification impacts of the set targets within the impact area or on other impact area out relevant actions to avoid, mitigate, or compensate potential negative 	nt (potential) indirect s and that it has set
Response:	Links and references
Zenus Bank just completed its minimum valuable product (MVP) and tested it in 2022. In 2023 we will improve our technology and start providing corporate services to SMEs and embedded banking services by the end of 2023.	

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



For retail customers, we seek to establish 10,000 accounts in 2023. We will track our goals in the retail accounts. However, our impact will be significant when we launch our corporate and embedded banking services, which are scheduled to launch in the fourth quarter of 2023.

Through our corporate accounts and embedded banking services in 2024, we aim to reach our targeted goals. We expect that through our embedded banking services to have a million users by the end of 2024.

Self-assessment summary

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

	•		
	first area of most significant impact: Financial Health & Inclusion)	second area of most significant impact: <i>Gender</i> Equality)	(If you are setting targets in more impact areas)your third (Decent Employment)
Alignment	⊠ Yes	⊠ Yes	Yes
	□ In progress	□ In progress □ No	□ In progress □ No
Baseline	🗵 Yes	🗵 Yes	🛛 Yes
	□ In progress	□ In progress	□ In progress
	□ No	□ No	□ No
SMART targets	🛛 Yes	🖾 Yes	⊠ Yes
	□ In progress	In progress	□ In progress
	□ No	□ No	□ No
Action plan	🖾 Yes	🖾 Yes	⊠ Yes
	□ In progress	□ In progress	□ In progress
	🗆 No	🗆 No	□ No



2.3 Target implementation and monitoring (Key Step 2) For each target separately:

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

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

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

Response:	Links and references
We have designed and stater collecting data related to our SGD KPI's. This is our first report that we submit to the UNEP FI PRB.	



Principle 3: Clients and Customers

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

3.1 Client engagement

Does your bank have a policy or engagement process with clients and customers¹⁰ in place to encourage sustainable practices?

□ Yes

⊠ In progress

□ No

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

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



🗆 Yes	
⊠ In progress	
□ No	
Describe how your bank has worked with and/or is planning to work with its customers to encourage sustainable practices and enable sustainable ecor should include information on relevant policies, actions planned/impleme clients' transition, selected indicators on client engagement and, where por achieved. This should be based on and in line with the impact analysis, target-setting and action by the bank (see P2).	nomic activities ¹¹). It nted to support ossible, the impacts
Response:	Links and references
We are currently developing policies, procedures and trainings to encourage sustainable practices and enable sustainable economic activities.	
encourage sustainable practices and enable sustainable economic	ve worked on these in s , information on nd/or as a % of your
 Business opportunities Business opportunities Describe what strategic business opportunities in relation to the increase of reduction of negative impacts your bank has identified and/or how you had the reporting period. Provide information on existing products and service sustainable products developed in terms of value (USD or local currency) a portfolio, and which SDGs or impact areas you are striving to make a position of the second service of the second servi	ve worked on these in s , information on nd/or as a % of your

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





Principle 4: Stakeholders

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

4.1 Stakeholder identification and consultation

Does your bank have a process to identify and regularly consult, engage, collaborate and partner with stakeholders (or stakeholder groups¹²) you have identified as relevant in relation to the impact analysis and target setting process?

🗆 Yes

⊠ In progress

🗆 No

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

Response:	Links and references
We are building our technology to provide our banking services globally. Our current stakeholders are local regulators, investors, and the executive team. In addition, we are progressing in identifying external stakeholders that align with our SDGs and impact areas.	

Principle 5: Governance & Culture

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

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



5.1 Governance Structure for Implementation of the Principles Does your bank have a governance system in place that incorporates the PRB? ☑ Yes □ In progress □ No Please describe the relevant governance structures, policies and procedures your bank has in place/is planning to put in place to manage significant positive and negative (potential) impacts and support the effective implementation of the Principles. This includes information about - which committee has responsibility over the sustainability strategy as well as targets approval and monitoring (including information about the highest level of governance the PRB is subjected to), - details about the chair of the committee and the process and frequency for the board having oversight of PRB implementation (including remedial action in the event of targets or milestones not being achieved or unexpected negative impacts being detected), as well as a remuneration practices linked to sustainability targets. <i>Response:</i> Links and references The Governance Committee is responsible for overseeing the implementation of the Principles and reporting to the Board of Directors. Our CEO is part of the Governance Committee. Links and references The group is responsible for making strategic decisions, developing tools to measure impact and submitting the required annual reports. The group meets monthly and reports to the Governance Committee approves the Sustainability Implementation Group initiatives.		
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The Governance Committee approves the Sustainability Implementation	implementation of the Principles and reporting to the Board of Directors. Our CEO is part of the Governance Committee. The Chief Compliance Officer is acting as the Chief Sustainability Officer. As the bank continues to grow, the position will be assigned to another person. The Sustainability Implementation Group is composed of members of the risk, compliance, marketing and technology departments. The group is responsible for making strategic decisions, developing tools to measure impact and submitting the required annual reports. The group	
	The Governance Committee approves the Sustainability Implementation	
5.2 Promoting a culture of responsible banking:	5.2 Promoting a culture of responsible banking:	

among its employees (e.g., capacity building, e-learning, sustainability trainings for client-facing roles, inclusion in remuneration structures and performance management and leadership communication, amongst others).



Response:

We are developing trainings to create awareness among our employees and the Executive Team.

5.3 Policies and due diligence processes

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

Links and references

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

Response:	inks and references
We are developing policies and procedures to address environmental and social risks. However, our policies do not permit arms and ammunition and petroleum-related corporate customers, which aligns with ecological risks. Also, the banks do not help politically exposed persons in our portfolio to prevent foreign corruption aligned with social risks.	

Self-assessment summary

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

🛛 Yes

🗆 No

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

🛛 Yes

🗆 No

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

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



□ Yes

🗵 In progress

🗆 No



Principle 6: Transparency & Accountability

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

6.1 Assurance

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

□ Yes

□ Partially

🛛 No

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

Response:	Links and references
This is Zenus Bank first PRB report. We will begin to assure our PRB by the third year when our technological structure in ready to provide the services.	

6.2 Reporting on other frameworks

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

🗆 GRI

 \Box SASB

 \Box CDP

□ IFRS Sustainability Disclosure Standards (to be published)

□ TCFD

□ Other:



Response:

Not at the moment.

6.3 Outlook

What are the next steps your bank will undertake in next 12 month-reporting period (particularly on impact analysis¹⁴, target setting¹⁵ and governance structure for implementing the PRB)? Please describe briefly.

Links and references

Response:	Links and references
On the next 12 month we aim to grow our retail portfolio and to launch our commercial and institutional programs to reach more individuals globally. At the same time we will continue to build monitoring tools that will allow us to keep track of the impacts we identified on a daily basis allowing us to make the necessary adjustments to reach our goals. We will begin our campaign to promote the UNEP FI principles with our partners and vendors.	

6.4 Challenges

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

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

- □ Embedding PRB oversight into governance
- $\hfill\square$ Gaining or maintaining momentum in the bank
- \Box Getting started: where to start and what to focus on in the beginning
- □ Conducting an impact analysis
- □ Assessing negative environmental and social impacts
- □ Choosing the right performance measurement methodology/ies
- □ Setting targets
- □ Customer engagement

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

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



□ Stakeholder engagement

- \Box Data availability
- Data quality
- \Box Access to resources
- □ Reporting
- □ Assurance
- □ Prioritizing actions internally
- □ Other: ...

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