FAIR FINANCE GHANA

ESG POLICY ASSESSMENT REPORT

MAY 2026

Towards a Race to the Top

FairFinance Ghana

Fair Finance Ghana Coalition

ESG Policy Assessment Report of Five Banks in Ghana

May 2026

Executive Summary

This report presents the findings of an assessment of Environmental, Social, and Governance (ESG) policies of five sampled banks in Ghana. The assessment evaluates bank commitments beyond compliance with domestic regulatory requirements and benchmarks them against internationally recognised standards and best practices for responsible sustainable banking.

Overall, the results indicate a low and uneven integration of ESG principles across the assessed banks. While three of the five banks demonstrate relatively stronger commitments in certain thematic areas, particularly labour rights, biodiversity, and human rights, the rest of the banks exhibit significant policy gaps across environmental and governance themes. Climate change, transparency and accountability, and corruption emerge as the weakest areas across the assessment.

The findings further reveal that ESG considerations are largely confined to internal operations, with limited accountability for companies benefiting from bank lending and investments. Additionally, weak adoption of international sustainability standards and limited use of standardised ESG reporting frameworks constrain the ability of banks to demonstrate and operationalise responsible banking practices. These gaps limit the sector's contribution to sustainable development, climate action, gender equality, and social protection, while increasing exposure to long-term financial, environmental, and reputational risks.

Key Recommendations

To strengthen ESG integration within Ghana's banking sector, the report recommends a deliberate shift toward the adoption of internationally recognised responsible banking and sustainability standards. Banks are encouraged to align their policies with global frameworks such as the Equator Principles, IFC Performance Standards, UN Guiding Principles on Business and Human Rights, and the UN Women's Empowerment Principles in order to close critical gaps identified in the assessment.

The report further recommends that banks extend ESG accountability beyond internal operations to include companies benefiting from their lending and investment activities. This requires integrating environmental, social, and governance requirements into corporate credit policies, project finance, and asset management practices, particularly for high-risk sectors.

Executive Summary

In addition, the adoption of standardised ESG reporting frameworks is strongly encouraged to improve transparency and public disclosure. Enhanced reporting will ensure that existing policies and practices are adequately communicated and recognised, strengthening accountability and stakeholder confidence.

Finally, the report calls on regulators, civil society, and development partners to support this transition through clearer regulatory guidance, capacity building, and sustained engagement with financial institutions, to position Ghana’s banking sector as a credible driver of sustainable and inclusive development.

About Fair Finance Ghana Coalition

Fair Finance Ghana Coalition (FFGC) is a coalition of civil society organisations launched in July 2024 which works toward ensuring that financial institutions invest in a socially and environmentally responsible manner. FFGC is part of the broader international civil society network, Fair Finance International (the FFI network), that seeks to strengthen the commitment of banks and investors to social, environmental, and human rights standards. Since 2014, a total of 159 financial institutions in 16 countries and 4 continents have been assessed using the Fair Finance Methodology: 131 banks, 20 insurance companies and 8 pension funds. FFGC applies the Fair Finance Methodology to assess and benchmark responsible investment and credit policies of financial institutions active in Ghana.

The objective is to foster a 'race to the top' among banks and financial institutions by promoting adherence to Environmental, Social, Governance (ESG) global best practices and standards. This approach is designed to create a self-reinforcing cycle where financial institutions continuously improve their compliance with these standards, ultimately resulting in more sustainable lending, investments and asset management globally.

The current membership of FFGC consists of the following organisations:

1. Oxfam in Ghana
2. Africa Centre for Energy Policy (ACEP)
3. Ghana Anti-Corruption Coalition (GACC)
4. WACAM
5. Friends of the Nation (FoN)
6. Media Foundation for West Africa (MFWA)
7. Centre for Public Interest Law (CEPIL)
8. Women in Law and Development Africa (WILDAF)
9. Economic Governance Platform (EGP)

About the Report

This report provides insight into the application of the 2025 Fair Finance Methodology to the sustainability policies of selected banks in Ghana. As the maiden policy assessment using this updated methodology in the Ghanaian context, it establishes a baseline on how banks are integrating environmental, social, and governance (ESG) considerations into their policies, public commitments, and risk management systems. Drawing on publicly available information, the report benchmarks bank policies against international responsible finance standards, highlights key gaps and emerging good practices, and supports ongoing stakeholder engagement to strengthen sustainable finance and accountability within Ghana's banking sector.

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1.0 Introduction

Climate change and sustainable development are intrinsically linked challenges that shape the trajectory of global economic growth, environmental integrity, and social well-being[1]. Rising global temperatures, increasing frequency of extreme weather events, sea-level rise, and ecosystem degradation pose systemic risks to economies and societies, particularly in developing countries[2]. These impacts threaten livelihoods, widen inequalities, and undermine long-term development prospects. The concept of sustainable development therefore provides a[1] critical framework for addressing these risks by ensuring that economic growth meets present needs without compromising the ability of future generations to thrive, while balancing environmental protection, social inclusion, and economic resilience.

Within this context, financial institutions occupy a central and increasingly influential role. Banks and other financial actors do not merely respond to economic trends; through their lending, investment, and underwriting decisions, they actively shape development pathways and determine which sectors, technologies, and business models expand or decline. As such, the alignment of financial flows with sustainable development objectives has become a defining challenge of the global response to climate change, biodiversity loss, and social inequality.

Globally, a growing coalition of countries, cities, businesses, and financial institutions has begun to respond by committing to net-zero targets and aligning financial portfolios with a 1.5°C warming pathway[3]. Many financial institutions within this coalition have pledged to achieve net-zero financed emissions by 2050 and are increasingly embedding sustainability considerations into their decision-making processes. In Ghana, this shift is becoming more visible, with reported compliance to Bank of Ghana's Sustainable Banking Principles increasing from approximately 42.2 percent in 2021 to 73.6 percent by March 2025, reflecting growing efforts by banks to integrate environmental sustainability principles into their operations[4].

Despite these advances, significant questions remain regarding the depth, consistency, and credibility of sustainability integration within the financial sector. The global financial system stands at a critical juncture, facing escalating risks from climate change, biodiversity loss, human rights violations, and social exclusion[5]. In this evolving landscape, financial institutions are no longer viewed as passive capital allocators, but as pivotal actors with both the responsibility and capacity to influence sustainable development outcomes.

[1] Sarwar, Muhammad. (2025). Climate Change and Sustainable Development: A Pathway for Global Cooperation. ĪQĀN. 7. 1-26. 10.36755/iqan.v7i2.458.
[2] Earthjustice (2025). How Climate Change Is Fueling Extreme Weather. Accessed on December 15, 2025 from https://earthjustice.org/feature/how-climate-change-is-fueling-extreme-weather
[3] United Nations (n.d.) Climate Action. Accessed on December 15, 2025 from https://www.un.org/en/climatechange/net-zero-coalition
[4] James Eshun (2025). Green financing compliance in banking sector hits 73.6% by 2025 Q1- BoG. Myjoyonline. Accessed on December 15, 2025 from https://www.myjoyonline.com/green-financing-compliance-in-ghana-hits-73-6-by-2025-q1-bog/
[5] NGFS (2024). Nature-related Financial Risks: a Conceptual Framework to guide Action by Central Banks and Supervisors. Accessed from https://www.ngfs.net/system/files/import/ngfs/medias/documents/ngfs-conceptual-framework-nature-risks.pdf

Against this backdrop, this report provides a comprehensive assessment of the extent to which financial institutions have integrated sustainability into their core policies and practices. Moving beyond headline commitments, the analysis evaluates the incorporation of environmental, social, and governance (ESG) principles across internal operations, lending activities, and investment portfolios. Drawing on established international frameworks, including the Equator Principles, the UN Global Compact, the IFC Environmental, Health, and Safety Guidelines, the IFC Performance Standards, the UN Guiding Principles on Business and Human Rights, the UN Women's Empowerment Principles, and the OECD Guidelines for Multinational Enterprises, the report benchmarks institutional policies against international best practice. In doing so, it identifies critical gaps, and highlights the extent to which the financial sector is transitioning toward greater accountability and a genuinely sustainable economy.

1.1 Objectives of the ESG Policy Assessment

The overarching objective of this assessment is to evaluate the extent to which selected financial institutions in Ghana have integrated environmental, social, and governance (ESG) considerations into their policies, and to benchmark these commitments against internationally recognised standards for responsible and sustainable finance.

Specific Objectives

1. To assess the existence and quality of ESG-related policies within selected banks, focusing on key thematic areas including climate change, biodiversity, human rights, labour rights, gender equality, corruption, tax responsibility, and transparency and accountability.

2. **T**o evaluate the alignment of bank policies with international ESG and responsible banking frameworks, including the Equator Principles, IFC Performance Standards, UN Guiding Principles on Business and Human Rights, UN Global Compact principles, UN Women's Empowerment Principles, and OECD Guidelines for Multinational Enterprises.

1.2 Methodology of ESG Policy Assessment

The policy assessment is based on the Fair Finance Guide International (FFGI) Methodology, a framework designed to evaluate the extent to which financial institutions (FIs) integrate international sustainability standards and responsible business practices into their financing and investment policies[6]. The 2025 Ghana Policy Assessment takes into account bank policies published within the period of January 1, 2024 to December 31, 2024.

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[6] Laplane, J., C. Rajeevan and J.W. van Gelder (2025, February), Fair Finance Guide International Methodology 2025, Amsterdam, The Netherlands: Profundo. https://www.fairfinanceinternational.org/ff-international/about-us/#Methodology

The assessment is structured around specific "assessment elements" derived from international standards and emerging good practices. These elements define the expectations of the Fair Finance International (FFI) network for Financial Institutions (FIs), covering their internal operations, portfolio management, and requirements for the companies they finance or invest.

These elements are primarily grouped into:

- crucial for a policy regarding the financial institution's internal operations.
- crucial for a policy regarding the companies a financial institution invests in or finances.

The last element is key: the biggest impact of banks on society are via the companies and projects the banks invest in or finances.

The methodology is composed of nineteen (19) themes representing the sustainability focus areas for the assessment. However, this report focuses on eight core themes outlined by the methodology as Biodiversity, Climate Change, Corruption, Gender Equality, Human Rights, Labour Rights, Tax, and Transparency and Accountability. For a more accurate analysis, FFGI identifies four “investment (scope) categories” within which these themes are evaluated:

1. Corporate Credits (non – private loans, shares underwriting and bond issuances),
2. Project Finance (infrastructure financing),
3. Asset Management (private banking, retail services or wealth management) where these elements (themes) will be evaluated

1.2.1 Scoring Criteria

The assessment scores are assigned within the Fair Finance Guide International (FFGI) Methodology by evaluating both the content of a financial institution’s (FI) policy and the scope of its application across the institution’s activities. The final score for an assessment element is determined by multiplying the basic content score by the scope score (expressed as a percentage).

Basic Content Score

For each assessment element (or standard) defined within a sustainability element (theme), the policy is analysed against specific scoring criteria derived from international standards.

Table 1: Criteria for Awarding a Basic Score

Content of Policy	Basic Score	Conditions for awarding scores
Sufficient/Full Alignment	1	Awarded if policy fully commits to the element or theme and meets all the scoring criteria of the element assessment.
Partially Sufficient/Basic	1 (but limited scope) or 0.5	Granted if the policy meets only essential parts of the element but not all of it. This includes cases where; 1) Commitment is vague. 2) The policy meets some but not all criteria or 3) The FI has taken initiative aligned with the element's spirit but not yet formalised in its policies.
None/Insufficient	0	Awarded if no sufficient policies aligned with the criteria are found

The Scope Score (Multiplier)

The scope assessment determines how widely the policy applies across the financial institution's investment and financing activities. The methodology uses the four key investment categories (scope categories) for most FIs assessed. The scope score is expressed as a percentage, reflecting the proportion of relevant investment categories covered by the policy.

Table 2: Scope Score Criteria

Scope of Policy Coverage	Scope Score
Applied to all relevant investment categories	100% or 1
Unclear or partially applied	50% or 0.5
Applied to one or more categories	50-100% or 0.5-1.0

In some instances where a policy commits to an element, but its scope is limited (i.e., it applies to only some, but not all, relevant investment categories), a partial score (0.5 < 1) is granted. However, if the FI does not clarify the scope of its policy, the methodology assumes that only 50% of its activities are covered, resulting in a default scope score of 50%. A partial score is also granted if the policy contains a strong loophole, such as a very high threshold or important exceptions.

Final Score

The final score for an individual assessment element is calculated by multiplying the basic content score (0, 0.5, or 1) and the scope score (0.5, 1, or 50% to 100%) to result in three possible scenarios:

- A full score or 1 or 100%: Granted if the policy meets all content criteria (Basic Score of 1) and applies to the full scope of the FI's relevant financial activities (Scope Score of 100%), or
- A basic score (0.5 or 50%): Granted either when the policy content is only partially sufficient (Basic Score of 1, Scope Score defaults to 50%) or when the content is sufficient, but the scope is unclear (Basic Score of 1, Scope Score defaults to 50%).
- A partial score (0.5-1 or 50%-100%): Granted when the policy content satisfies one or more investment categories of the FI's relevant activities in addition to the basic score.

Theme Scores

The scores for all elements within a theme are added together and then divided by the total number of applicable elements. This yields the final score for that theme, which is often expressed as a percentage or on a scale of 0 to 10.

1.2.2 Sampling of Banks

Five banks were selected for the policy assessment. This report maintains anonymity of banks sampled to prevent a focus on individual banks and rather to focus on the broader banking sector itself. However, the following broad criteria was used for the sampling:

1. The share of industry operating assets: Industry operating assets are comprised of cash assets, liquid assets, net loans and advances, and other operating assets.

2. Data source: The data on industry operating assets was sourced from the annual Banking Survey Report published by PwC Ghana.

2.0 Assessment Results of Financial Institutions

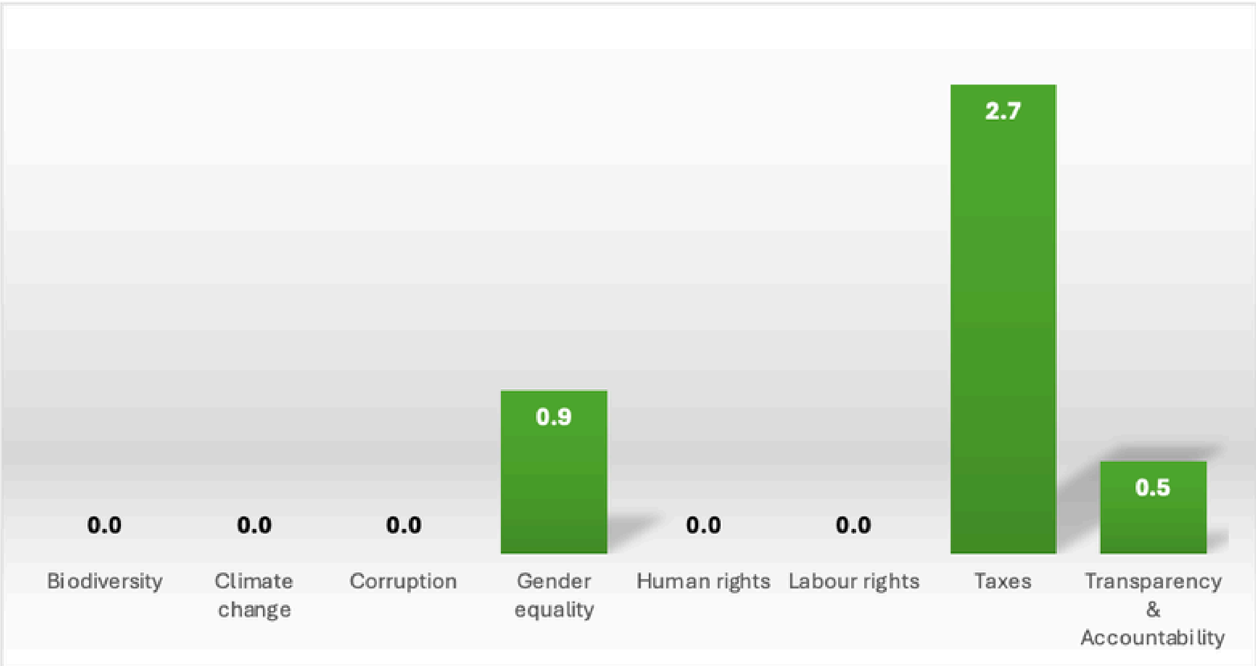
The five (5) financial institutions selected for this assessment are primarily commercial banks operating in Ghana and are regulated by the Bank of Ghana under the Banks and Specialised Deposit-Taking Institutions Act, 2016 (Act 930). The following subsections provide results of the assessment of sustainability commitments for the five commercial banks considered in this report.

2.1 Bank A

1

The bank's core business focus and services encompass retail, small and medium enterprise (SME), corporate, and investment banking services, including trade finance, treasury, remittances, and digital banking solutions. For the period under review, the bank's ESG policy assessment results are illustrated in Figure 1 below:

Figure 1: Thematic Scores for Bank A



2.2 Bank B

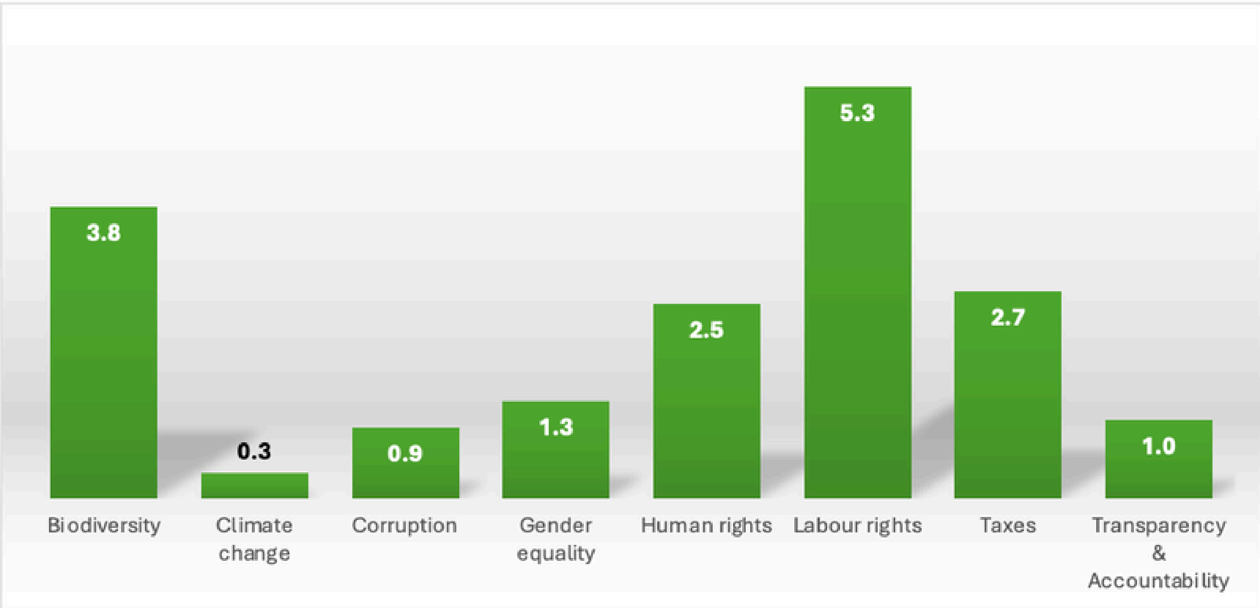
The bank's core business focus and services are diversified, spanning retail, SME, and wholesale banking segments. It offers other services such as investment banking and asset management. For the period under review, the bank's ESG policy assessment results are illustrated in Figure 2 below:

Figure 2: Thematic Scores for Bank B

2.3 Bank C

The bank's core business focus and services centre on delivering retail, SME, and corporate banking services. For the period under review, the bank’s ESG policy assessment results are illustrated in Figure 3 below:

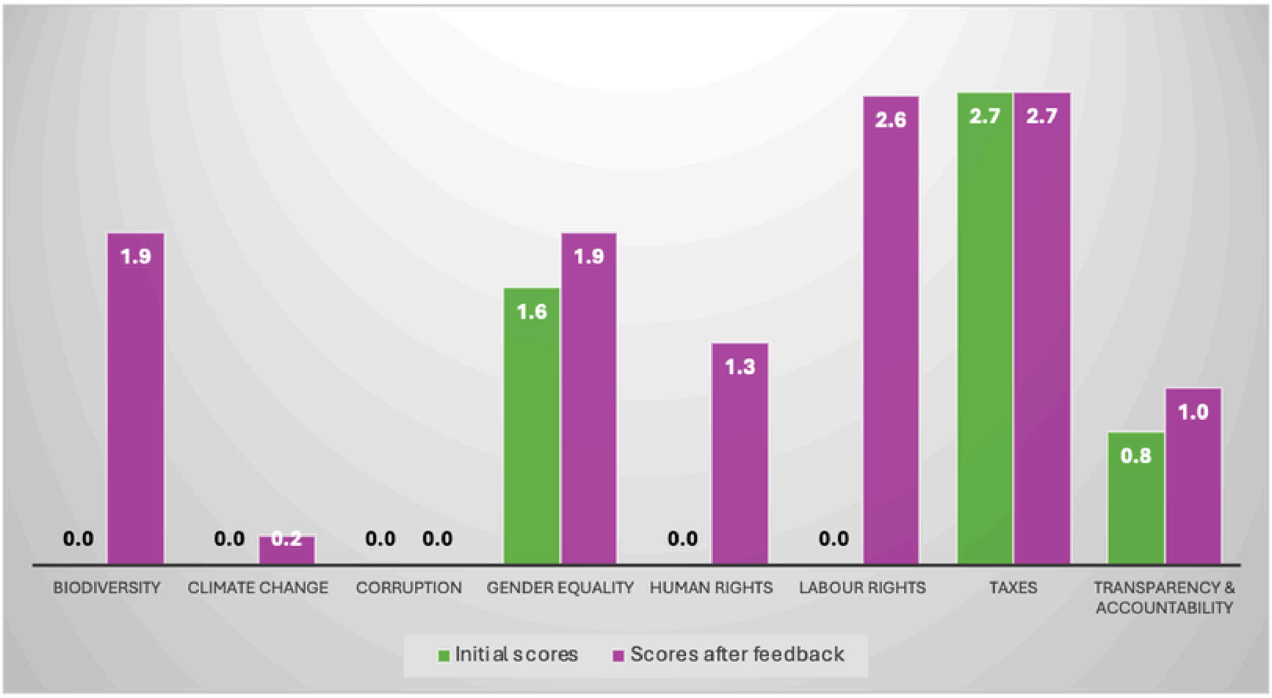
Figure 3: Thematic Scores for Bank C



2.4 Bank D

The bank's core business focus and services include specialized retail, business (SME), and corporate/investment banking services, with core strengths in trade finance and treasury operations. It also specializes in niche sectors, notably providing strategic support for agribusiness lending. During the assessment process, the bank responded to the draft assessment by providing feedback on some initial results. In line with the methodology, this feedback was reviewed, leading to clarifications and adjustments of some scores. The main feedback which resulted in the adjustments related to the bank's clarification on their statement indicating their commitment to the IFC Performance Standards and the IFC Environmental, Health and Safety Guidelines. The results of the policy assessment are illustrated in Figure 4 below:

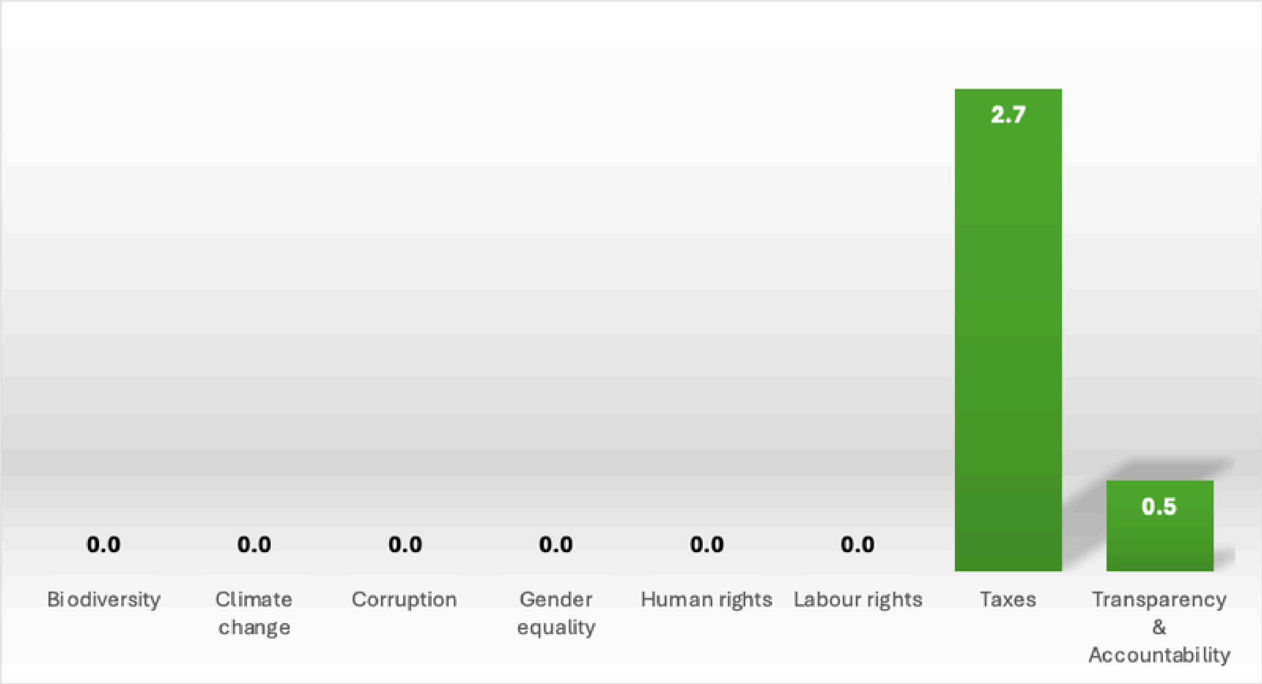
Figure 4: Thematic Scores for Bank D



2.5 Bank E

The bank's core business focus and services include retail, SME, and corporate banking, with an operational emphasis on digital channels and trade finance. For the period under review, the bank's ESG policy assessment results are illustrated in Figure 5 below:

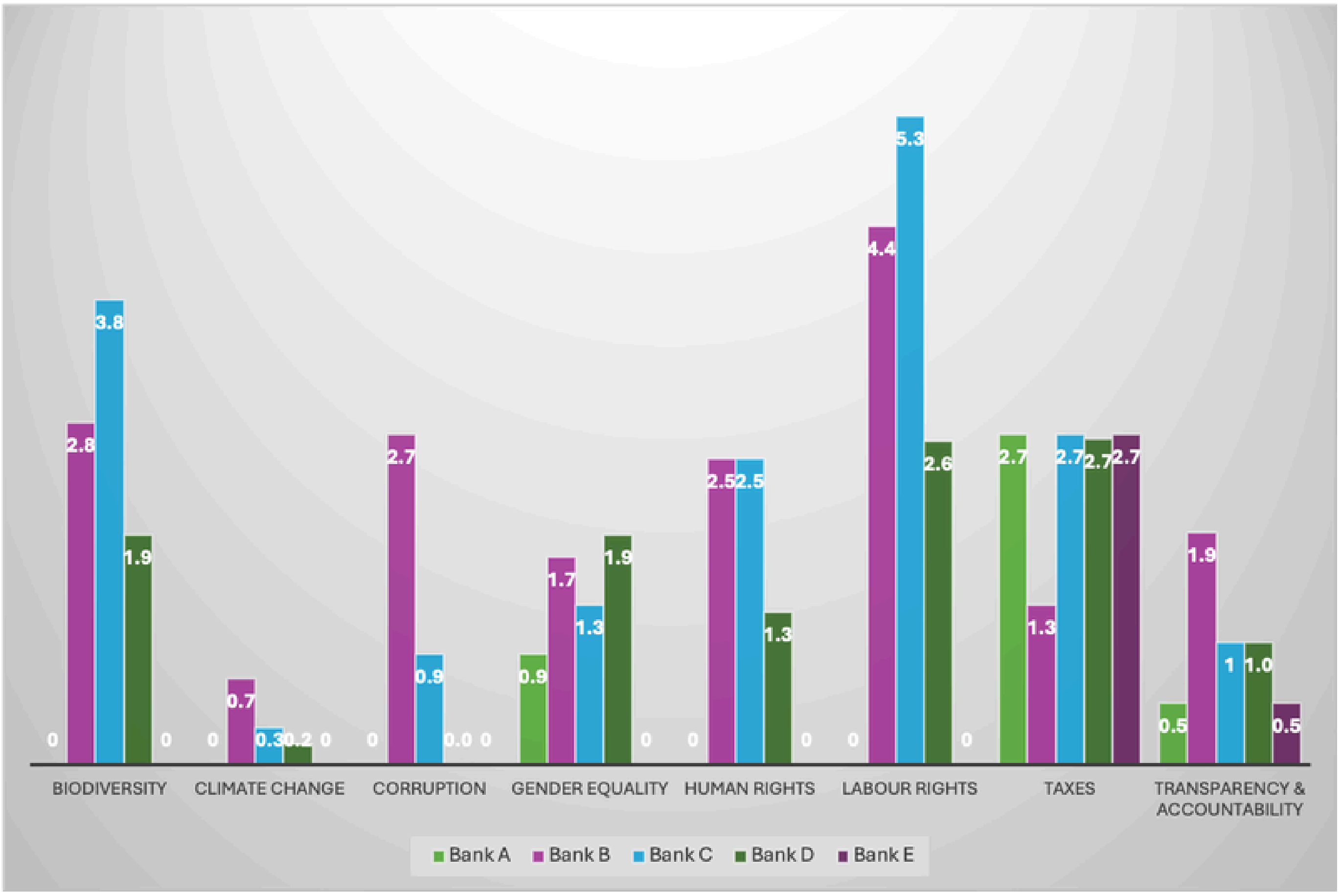
Figure 5: Thematic Scores for Bank E



3.0 Thematic Findings

The assessment of ESG policies and practices across selected Ghanaian banks reveals a generally low level of institutionalisation of sustainability principles within the banking sector. While a few banks demonstrate emerging commitments in specific thematic areas, ESG considerations are largely fragmented, unevenly applied, and in many cases absent. Two banks show comparatively stronger policy frameworks across several themes, whereas the other three exhibit significant gaps, particularly in environmental and governance-related areas. Overall[1], the findings suggest that ESG integration in Ghana's banking sector remains largely voluntary, with limited regulatory pressure and inadequate alignment with international responsible finance standards. Figure 6 below provides a summary of banks' performance for each thematic area considered in the policy assessment. Details of how banks scored per assessment element under each thematic area is presented in the appendix of this report.

Figure 6: Summary of Banks' Performance Per Assessment Theme



3.1 Biodiversity

Biodiversity is fundamental to economic productivity, social well-being, and long-term environmental sustainability. Ecosystems provide essential services such as food production, water regulation, climate regulation, and medicinal resources, all of which underpin economic activity. However, biodiversity is declining globally at unprecedented rates, with accelerating species extinction and ecosystem degradation posing direct risks to human development and economic stability. From a financial perspective, biodiversity loss creates nature-related financial risks, including supply chain disruptions, asset devaluation, regulatory exposure, and reputational risks.

Financial institutions play a critical role in influencing biodiversity outcomes through their financing and investment decisions, particularly in high-impact sectors such as mining, agriculture, oil and gas, forestry, infrastructure, and fisheries. Assessing biodiversity policies is therefore essential to determine whether banks are identifying, managing, and mitigating nature-related risks and aligning their investment strategies with emerging global expectations on nature protection.

Biodiversity emerges as one of the moderately developed ESG themes across the assessed institutions. With the exception of three banks which obtained some scores, there is limited evidence that biodiversity risks are integrated into credit decision-making or investment policies. Among the relatively better-performing institutions, higher scores are largely driven by references to international frameworks such as the IFC Performance Standards, which result in automatic scoring for several assessment elements related to requirements for financed companies. However, the application of these standards is often inconsistent across business lines, particularly in areas such as asset management, leading to lower overall scores due to limited scope. In addition, while some institutions reference these standards, there is often insufficient clarity on whether they apply across all financing and investment categories. More importantly, biodiversity considerations remain broadly framed and are not supported by detailed implementation mechanisms such as sector-specific risk screening, biodiversity impact assessments, or monitoring systems. As a result, beyond the automatic scores linked to international framework adoption, most institutions do not perform strongly across other assessment elements.

The absence of explicit biodiversity policies among several institutions is particularly concerning given the economy’s exposure to biodiversity-intensive sectors such as mining, agriculture, forestry, and infrastructure development. Without clear safeguards, financial institutions risk financing activities that contribute to land degradation, deforestation, and ecosystem loss, while also increasing their exposure to long-term financial, regulatory, and reputational risks.

3.2 Climate Change

Climate change represents one of the most significant systemic risks facing the global economy. Scientific evidence shows that human-induced greenhouse gas emissions are driving global temperature increases, intensifying extreme weather events, and disrupting natural and economic systems. Without significant reductions in emissions, global warming is projected to exceed safe thresholds within this century, with severe consequences for economic stability, infrastructure, food systems, and livelihoods.

Financial institutions are central to climate action because their financing decisions shape the future emissions trajectory of the global economy. Investments made today determine the carbon intensity of future economic activity. Assessing climate change policies within banks is therefore critical to determine whether financial institutions are supporting the transition to low-carbon development pathways, managing climate-related financial risks, and aligning with global climate goals such as limiting warming to 1.5°C.

Climate change emerged as the weakest thematic area across the assessment, reflecting the limited prioritisation of climate-related financial risks within the banking sector. Three of the five assessed banks demonstrate marginal engagement with climate issues, primarily through emissions reporting and limited references to sustainability principles in lending. In some cases, scores were driven by the disclosure of greenhouse gas emissions (Scope 1, 2, and 3) and the publication of measurable emission reduction targets. Additional points were obtained through the adoption of international frameworks such as the IFC Performance Standards, which provide automatic scoring for assessment elements requiring financed companies to align emissions reductions with a 1.5°C pathway. However, these isolated measures do not amount to comprehensive climate strategies, as there is little evidence of structured approaches to managing transition risks, physical climate risks, or scaling green finance.

The absence of robust, globally aligned climate policies among several institutions highlights a broader systemic gap in climate governance. This is notable given Ghana's national climate commitments under the Paris Agreement and the increasing global emphasis on aligning financial flows with low-carbon development pathways. The lack of climate policies limits the ability of banks to contribute to concrete measures aimed at reducing carbon emissions in line with national targets, while increasing their vulnerability to stranded assets and climate-related credit risks.

3.3 Corruption

Corruption undermines governance, economic growth, social development, and environmental protection. It weakens public institutions, reduces government revenue through tax evasion and illicit financial flows, and diverts public resources away from essential services such as healthcare, education, and infrastructure. Corruption also distorts markets, weakens competition, and enables environmentally destructive and socially harmful projects to proceed without proper oversight.

For financial institutions, corruption risks are highly relevant both internally and externally. Banks must ensure that their own operations are free from bribery, fraud, and illicit practices. At the same time, they must assess corruption risks among companies they finance or invest in, as financial flows can inadvertently support corrupt practices or enable the exploitation of natural resources and public assets. Assessing anti-corruption policies is therefore essential to evaluating the governance integrity of financial institutions and their role in supporting transparent and accountable economic systems.

Anti-corruption performance across the assessed institutions shows moderate but uneven results. Two banks demonstrated relatively stronger commitments through the adoption of international principles such as the UN Global Compact and the presence of internal policies addressing anti-money laundering and the financing of terrorism. However, in some cases, while such policies are referenced, limited disclosure and lack of detail result in only partial scoring.

In contrast, the other three banks showed no evidence of alignment with global best practice anti-corruption frameworks, raising significant governance concerns. As financial intermediaries, banks play a critical role in preventing money laundering, fraud, and illicit financial flows. Weak anti-corruption frameworks not only undermine internal governance but also weaken the broader financial system's ability to support transparency and accountability in Ghana's economy. However, it is worth noting that, the Bank of Ghana ensures the practices of banks in Ghana align with the Anti-Money Laundering Act, 2020 (Act 1044), as amended by the Anti-Money Laundering (Amendment) Act, 2014 (Act 874), the Anti- Terrorism Act, 2008 (Act 762) and Regulations made under these enactments. Nonetheless, compliance with domestic regulation alone is insufficient to meet international best practice standards assessed in this framework.

3.4 Gender Equality

Gender equality is a fundamental human rights issue and a key driver of inclusive economic development. Persistent gender inequalities limit women's access to financial services, economic opportunities, leadership positions, and legal rights in many parts of the world. Women are also disproportionately affected by poverty, unpaid care responsibilities, and gender-based violence, which limits their economic participation and financial resilience.

Financial institutions influence gender outcomes through employment practices, leadership representation, and access to finance for women-owned businesses and entrepreneurs. Assessing gender equality policies helps determine whether banks are contributing to reducing gender disparities, promoting inclusive financial systems, and supporting broader social and economic development goals. Gender-responsive financial systems are particularly important in developing economies, where closing gender gaps can significantly boost economic growth and social stability.

Gender equality shows moderate levels of engagement across a few of the assessed institutions, though overall performance remains weak. Three banks demonstrated some commitment, although limited, through internal workplace policies such as non-discrimination and gender-inclusive training and development. In a few cases, there are also efforts to support access to finance for women-owned enterprises, which slightly strengthened performance. However, these commitments are generally narrow in scope and are not supported by measurable targets, leadership diversity objectives, or comprehensive gender-responsive financing strategies.

In contrast, there was no public evidence of gender-related policies for the two other institutions, highlighting persistent gaps in mainstreaming gender considerations within banking operations. This is particularly significant in contexts where women-owned businesses face structural barriers to accessing finance. The findings suggest that gender equality is largely approached as a social or compliance issue rather than being integrated as a strategic economic and financial priority within the sector.

3.5 Human Rights

Human rights are universal rights and freedoms inherent to all people, covering civil, political, economic, social, and cultural dimensions, as articulated in the Universal Declaration of Human Rights and subsequent international instruments. In the context of globalised economic activity, corporations and financial actors increasingly influence human rights outcomes through investment decisions, supply chains, and business operations. While corporate activity can generate economic opportunities, it can also contribute to human rights violations, particularly in high-risk sectors such as mining, agriculture, oil and gas, and infrastructure development. These impacts may include land displacement, environmental contamination, labour exploitation, and restricted access to information or justice for affected communities.

Financial institutions are highly relevant to human rights protection because, although they may not directly cause abuses, they can be linked to violations through the companies and projects they finance or invest in. As such, financial institutions are expected to conduct human rights due diligence, prevent and mitigate adverse impacts, and promote remediation where abuses occur. Assessing human rights policies is therefore critical to understanding whether banks are managing social risks across their financing portfolios and meeting global expectations on responsible business conduct.

The policy assessment shows that human rights considerations are weakly embedded across the assessed institutions. Three banks demonstrated some level of awareness through references to international standards within their operational policies. In such cases, scores were largely driven by the adoption of frameworks such as the IFC Performance Standards and, in some instances, the UN Global Compact, which triggered automatic scoring for the relevant assessment elements. However, these commitments remain largely general in nature and are not clearly operationalised within lending and investment decision-making processes.

The weak integration of human rights policies among banks presents a significant risk, particularly given exposure to sectors commonly associated with social conflict, land acquisition challenges, and community displacement. Without robust human rights due diligence frameworks, financial institutions risk being linked to projects that adversely affect communities and vulnerable groups, thereby undermining social stability and broader sustainable development outcomes.

3.6 Labour Rights

Labour rights are fundamental to protecting workers’ dignity, safety, and economic well-being, and form the foundation of sustainable and inclusive economic development. International labour standards, particularly those established by the International Labour Organization (ILO), require fair recruitment practices, safe working conditions, non-discrimination, freedom of association, and fair remuneration. Respect for labour rights contributes to stronger human capital development, more stable labour markets, and improved productivity, while also supporting broader democratic and economic development outcomes.

Global evidence shows that labour rights remain under pressure, with widespread restrictions on workers' rights to organise, bargain collectively, and strike. Financial institutions have responsibilities both as employers and as financiers of companies whose operations depend on labour practices across global supply chains. Assessing labour rights policies is therefore essential to determine whether financial institutions are promoting decent work standards internally and across the companies and sectors they finance, in line with international labour conventions and responsible investment principles.

Labour rights represent one of the relatively stronger thematic areas across the assessment, with three institutions demonstrating more advanced commitments compared to other ESG themes. Higher scores in this area are largely driven by the adoption of international frameworks such as the IFC Performance Standards, the UN Global Compact, and the IFC Environmental, Health and Safety Guidelines, which provide automatic scoring for several assessment elements related to labour practices in financed companies. This indicates that some institutions have established requirements for clients and investees to adhere to recognised labour standards. However, performance is less robust when it comes to internal labour policies, where scores remain comparatively low, suggesting limited disclosure or weaker policy frameworks in this area. Although not formally assessed, general adherence to national labour laws is assumed, which provide a baseline for employee protections, including rights to fair treatment and freedom of association. Overall, the findings suggest that commitments to decent work principles are emerging but are not yet comprehensive across all dimensions of labour rights.

On the other hand, the absence of publicly disclosed labour rights policies among two assessed banks highlights a notable gap in institutional attention to employee welfare and labour standards in line with global best practice.

3.7 Tax

Taxation is a cornerstone of sustainable development and democratic governance, providing governments with the resources needed to finance public services such as healthcare, education, infrastructure, and social protection. Fair and transparent tax systems also strengthen public accountability and citizen participation in governance processes. However, aggressive tax planning, tax avoidance, and the use of tax havens by multinational corporations and wealthy individuals significantly reduce government revenues, particularly in developing countries where public financing needs are highest.

Financial institutions are central to tax justice in three key ways. First, as corporate entities, they are expected to comply with tax laws and demonstrate responsible tax conduct. Second, financial institutions often provide financial services that enable tax planning by corporate and high-net-worth clients. Third, financial institutions have a responsibility to assess tax practices among the companies they finance or invest in. Assessing tax policies is therefore critical to determining whether financial institutions contribute to fair and transparent tax systems or facilitate practices that undermine public revenue mobilisation and sustainable development.

The policy assessment shows moderate performance on tax responsibility across most institutions, largely reflecting compliance with statutory tax obligations rather than the adoption of proactive responsible tax practices. Scores are primarily driven by basic disclosures on revenue, profits, and taxes paid, including, in some cases, reporting across operational segments. Where institutions operate only within a single jurisdiction and show no evidence of subsidiaries or branches in harmful tax jurisdictions, they receive additional points for limiting exposure to aggressive tax practices. In one instance, performance was slightly lower due to the absence of more detailed disclosures, such as country-by-country reporting for multinational operations.

Despite these moderate outcomes, there is limited evidence of advanced tax transparency and governance practices. None of the assessed institutions demonstrated comprehensive disclosures such as public reporting of tax rulings, detailed tax risk management strategies, or clear expectations for financed companies to adopt responsible tax practices. This suggests that tax responsibility is largely approached from a compliance perspective, with minimal alignment to emerging global standards on tax transparency and accountability.

3.8 Transparency and Accountability

Transparency and accountability are essential for enabling citizens, investors, and stakeholders to understand the social, environmental, and economic impacts of business activities. Access to information is a recognised right in multiple international instruments and is fundamental to enabling public participation in decision-making processes. Transparent disclosure of policies, risks, and impacts allows stakeholders to hold institutions accountable and supports responsible business conduct.

Transparency is particularly important for financial institutions because of their cross-cutting influence across multiple sectors of the economy. Through lending, investment, and underwriting activities, financial institutions indirectly shape environmental and social outcomes across entire industries. As a result, financial institutions are expected to disclose not only their own policies and operations, but also information about the projects, companies, and sectors they finance. Strong transparency practices also enable financial institutions to identify public concerns early, manage reputational risks, and build trust with stakeholders. Assessing transparency and accountability policies is therefore essential to evaluating whether financial institutions are operating in a manner consistent with responsible and sustainable finance principles.

The policy assessment reveals that transparency and accountability remain underdeveloped across the banks assessed. While all institutions provide some level of disclosure on the composition of their portfolios, including breakdowns by size, region, and industry, these disclosures represent only basic transparency requirements and do not extend to comprehensive ESG reporting in line with globally recognised frameworks.

Two banks demonstrated relatively stronger performances due to the publication of sustainability reports aligned with the Global Reporting Initiative (GRI). In one case, additional points were awarded for the publication of a detailed policy on environmental and social risk management systems, including how investment decisions are screened against internal policy conditions. However, even where sustainability reporting frameworks are referenced, the scope of disclosures remain limited and do not fully cover all operational areas of the banks.

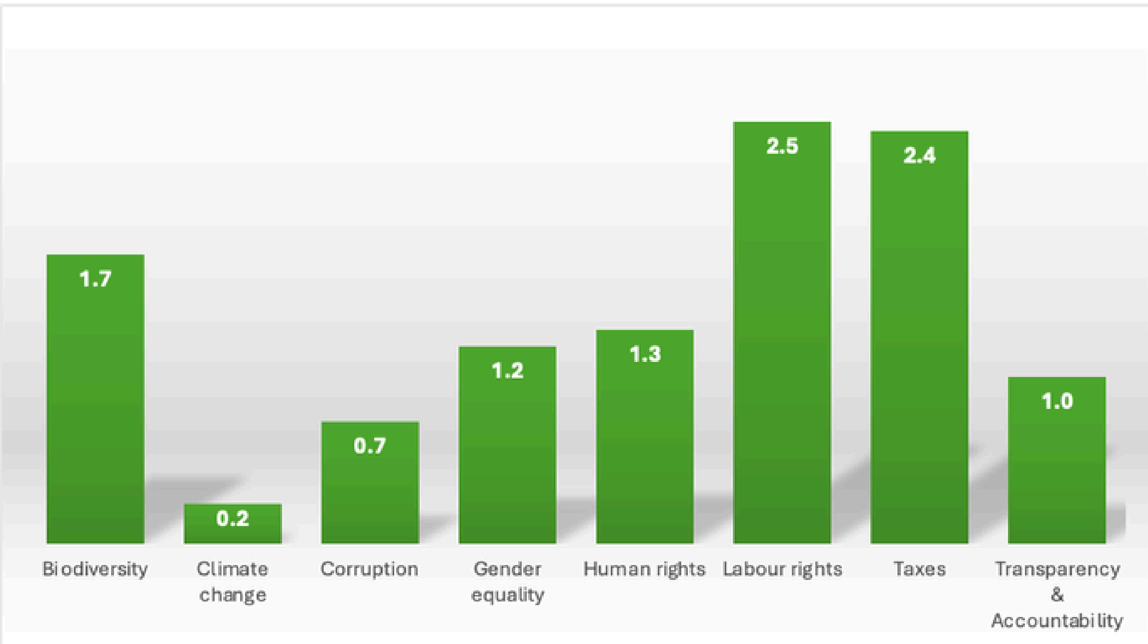
For the other banks, transparency practices were found to be weak, with limited publication of sustainability reports and external verification processes, exclusion lists, or documented engagement with financed companies on ESG issues. This lack of comprehensive disclosure reduces stakeholder confidence and constrains meaningful public scrutiny of banking operations and their broader social and environmental impacts. The findings highlight the need for stronger disclosure requirements and greater alignment with established international reporting frameworks, including the GRI and the Principles for Responsible Banking.

3.9 Summary of Thematic Performance

The overall results indicate generally low ESG policy integration across the assessed thematic areas, with only a few dimensions showing moderate performance. Labour rights records the highest average score (2.5), followed closely by tax responsibility (2.4), suggesting relatively stronger alignment with basic compliance requirements and international labour and tax-related standards within the sample. Biodiversity (1.7), human rights (1.3), and gender equality (1.2) reflect low-to-moderate engagement, indicating partial but inconsistent incorporation of social and environmental considerations into banking policies.

In contrast, transparency and accountability (1.0), corruption (0.7), and especially climate change (0.2) show the weakest performance. The extremely low climate change score highlights a critical gap in climate risk integration and transition planning within the sector. Figure 7 illustrates the average performance of assessed banks across the ESG thematic areas.

Figure 7: Average Theme Scores Across Sample



4.0 Discussions

The ESG policy assessment results reflect not only differences in institutional commitment among the assessed banks, but also deeper, cross-cutting structural and systemic factors that shape ESG performance across Ghana's banking sector. Three interrelated issues largely explain the low and uneven scores recorded across thematic areas:

- Limited adoption of international sustainability standards,
- Weak accountability mechanisms for investee and borrower companies, and
- Inadequate use of standardised reporting frameworks.

First, the limited adoption of internationally recognised sustainability and responsible banking standards significantly constrained the performance of most banks in the assessment. Frameworks such as the Equator Principles, the UN Global Compact, the IFC Environmental, Health, and Safety Guidelines, the IFC Performance Standards, the UN Guiding Principles on Business and Human Rights, the UN Women's Empowerment Principles, and the OECD Guidelines for Multinational Enterprises form the backbone of global best practice in ESG governance. These standards provide clear benchmarks for environmental risk management, social safeguards, human rights due diligence, gender inclusion, and ethical business conduct.

The assessment methodology deliberately evaluates bank commitments beyond compliance with local regulatory requirements, focusing instead on alignment with these global norms. As a result, banks that have not formally adopted or referenced these international standards lose out on a substantial number of assessment elements. This is particularly evident in themes such as climate change, biodiversity, human rights, gender equality, and corruption, where global frameworks offer detailed guidance that goes beyond domestic regulation. The findings therefore suggest that low scores are less a reflection of regulatory non-compliance and more an indication of limited alignment with international best practice.

Second, limited accountability in relation to investee companies and lending beneficiaries further explains the weak performance across several themes. Many banks lack clear policies that extend ESG expectations to corporate borrowers and companies benefitting from credit facilities. This gap is especially critical because the assessment allocates significant weight to how banks manage ESG risks across different financial activities, including corporate credit, asset management, and proprietary assets where applicable.

In the absence of explicit requirements for clients to adhere to environmental, social, and governance standards, banks score poorly on scope-related elements of the assessment. This affects performance in areas such as biodiversity protection, labour rights, human rights, and climate change, where impacts are often indirect and occur through financed activities rather than internal operations. The findings therefore highlight a structural weakness in how Ghanaian banks conceptualise ESG responsibility, often limiting it to internal policies while overlooking the far greater ESG footprint associated with their lending and investment portfolios.

Third, limited adoption of standardised sustainability reporting frameworks significantly affected banks' scores. Frameworks such as the Global Reporting Initiative (GRI), Sustainability Accounting Standards Board (SASB), and the Principles for Responsible Banking provide structured approaches for disclosing ESG policies, implementation mechanisms, and performance outcomes. The assessment relies primarily on publicly available information, including annual reports, sustainability disclosures, and policy documents.

Where banks fail to report adequately, even existing policies and practices cannot be fully recognised in the scoring process. This creates a transparency gap, whereby the absence of disclosure is treated as the absence of policy commitment. Consequently, weak reporting practices constrain scores in themes such as transparency and accountability, tax, labour rights, and gender equality. The findings therefore underscore that ESG performance is not only about having policies in place, but also about communicating them clearly and consistently to stakeholders.

Generally, these cross-cutting issues suggest that the relatively low ESG scores observed across the banking sector are driven by structural limitations to an extent rather than by outright policy neglect. Addressing these gaps will require a deliberate shift toward international standard adoption, stronger ESG expectations for borrowers and investee companies, and improved sustainability reporting practices. Without such reforms, Ghanaian banks risk remaining misaligned with global responsible finance trends, limiting their ability to attract sustainable finance, manage long-term risks, and contribute meaningfully to national development and climate objectives.

5.0 Conclusion and Recommendations

The assessment underscores a critical gap between Ghana's banking sector and global best practices in ESG governance. Despite the growing importance of sustainable finance in addressing climate change, social inequality, and governance risks, most assessed banks have yet to embed ESG principles systematically into their policies, lending decisions, and investment practices.

The generally low scores across key themes, particularly climate change, corruption, gender equality, human rights and transparency, reflect structural limitations rather than isolated institutional failures. Chief among these are the limited adoption of international ESG standards, weak mechanisms for holding investee and borrower companies accountable, and inadequate public reporting on sustainability policies and practices. As a result, ESG commitments remain largely declaratory, fragmented, and insufficiently linked to financial decision-making.

Without deliberate reforms, Ghanaian banks risk falling further behind global responsible finance trends, limiting their access to sustainable finance opportunities and undermining their role in supporting national development priorities such as climate resilience, gender inclusion, decent work, and environmental protection. Strengthening ESG governance in the banking sector is therefore not only a sustainability imperative, but also a strategic financial and economic necessity.

Recommendations

a. For Banks

Banks should prioritise the formal adoption and implementation of internationally recognised ESG and responsible banking standards, including the Equator Principles, the UN Global Compact, the IFC Performance Standards, the UN Guiding Principles on Business and Human Rights, the UN Women's Empowerment Principles, and the OECD Guidelines for Multinational Enterprises. Aligning internal policies with these frameworks will strengthen environmental and social risk management and improve performance across multiple ESG themes.

Banks should also extend ESG accountability beyond internal operations to companies benefiting from their lending and investment activities. This includes integrating ESG requirements into corporate credit policies, project finance agreements, and asset management practices, as well as conducting environmental and social due diligence for high-risk sectors such as mining, energy, agriculture, and infrastructure.

In addition, banks should strengthen ESG disclosure by adopting standardised reporting frameworks such as the Global Reporting Initiative or the Principles for Responsible Banking.

Improved public reporting will enhance transparency, enable stakeholder scrutiny, and ensure that existing policies and practices are adequately reflected in future assessments.

b. For Regulators and Policymakers

Policymakers and regulators should incentivise sustainable finance through regulatory and fiscal measures, such as preferential capital treatment for green assets or support for climate-aligned lending frameworks. This would help reduce barriers to compliance and encourage banks to align financial flows with Ghana's national development plans and climate commitments.
Financial sector regulators should strengthen guidance on ESG integration within banking operations, particularly, expectations for climate risk management, transparency, gender inclusion and human rights. Strengthening ESG-related supervisory guidelines or disclosure requirements would help align efforts with global benchmarks and reduce reliance on voluntary adoption.

Regulators and policymakers should invest in the development of ESG-relevant national data systems to support evidence-based decision-making within the banking sector. Improved availability of reliable data on climate risks, emissions, biodiversity impacts, social vulnerabilities, and other sustainable finance activities would enable banks to better assess risks, set measurable targets, design appropriate interventions, and monitor progress toward national sustainable development and climate objectives.

c. For Civil Society and Development Partners

Civil society organisations should deepen engagement with banks through structured dialogue, independent assessments, and public accountability initiatives to encourage stronger ESG commitments. Development partners can support capacity building within the banking sector by providing technical assistance on international ESG standards, climate finance, and sustainability reporting.

Civil society organisations should engage more broadly with business groups, industry associations, and other lenders on sustainable finance and the importance of cooperating with banks to ensure broad compliance with ESG standards. Such engagement can help strengthen awareness of responsible business practices across sectors, improve alignment between financial institutions and their clients, and support the development of a more coordinated ecosystem for sustainable finance implementation in Ghana.

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Appendix

A.1 BIODIVERSITY

Assessment Elements	Bank B	Bank A	Bank D	Bank C	Bank E
The following elements are related to the financial institution's transparency and strategy:					
The financial institution measures and discloses the biodiversity footprint of its portfolio.	0	0	0	0	0
The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:					
Companies prevent negative impacts on High Conservation Value (HCV) areas within their business operations and the areas they manage.	0.75	0	0.5	1	0
Companies prevent negative impacts on protected areas that fall under the categories I-IV of the International Union for Conservation of Nature (IUCN) within their business operations and the areas they manage.	0.75	0	0.5	1	0
Companies prevent negative impacts on UNESCO World Heritage sites within their business operations and the areas they manage.	0.75	0	0.5	1	0
Companies prevent negative impacts on protected areas that fall under the Ramsar Convention on Wetlands within their business operations and the areas they manage.	0.75	0	0.5	1	0
Companies prevent negative impacts on endangered plant and animal species	0.75	0	0.5	1	0

Production of, or trade in, living genetically modified organisms can only take place if permission has been obtained from the importing country and all requirements of the Cartagena Protocol have been met.	0	0	0	0	0
Companies conduct water scarcity impact assessments in water scarce regions.	0	0	0	0	0
Companies have comprehensive mitigation measures in place to address community and ecosystem water requirements in areas where environmental impact assessments identify that significant impacts to water resources are likely.	0	0	0	0	0
Companies make an environmental impact assessment on the total consequences of a large scale project on biodiversity, at least according to GRI 304: Biodiversity 2016 or other relevant standards (mentioned in section 2.1.3 of the FFGI Methodology).	0	0	0	0	0
Enlarging plastics production capacity is unacceptable.	0	0	0	0	0
Companies in relevant industries (oil and gas, chemicals, containers and packaging, food and beverage, personal and household products, FMCGs) reduce their plastic footprint.	0	0	0	0	0
Companies in relevant industries (oil and gas, chemicals, containers and packaging, food and beverage, personal and household products, FMCGs) transparently disclose their plastic footprint, including the proportion of fossil-based virgin plastics production/use compared to their total plastics production/use.	0	0	0	0	0
Deep sea mining is unacceptable.	0	0	0	0	0
Companies integrate criteria on biodiversity into their procurement and operational policies.	0.75	0	0.5	1	0

Companies include clauses on the compliance with criteria on biodiversity in their contracts with subcontractors and suppliers.	0	0	0	0	0
Total scores	2.8	0	1.9	3.8	0
Total scores expressed as percentage	28%	0%	19%	38%	0%

A.2 CLIMATE CHANGE

Assessment Elements	**Bank B**	**Bank A**	**Bank D**	**Bank C**	**Bank E**
The following elements are crucial for a policy regarding the financial institution's internal operations:					
For its own direct and indirect greenhouse gas emissions, the financial institution establishes measurable reduction objectives that are aligned with limiting the maximum global temperature increase of 1.5°C.	0.5	0	0	0	0
The following elements are crucial for a policy regarding the financial institution's management of its portfolio of corporate loans and investments:					
The financial institution discloses its financed emissions - meaning the absolute scope 1 and scope 2 GHG emissions associated with the companies in its lending and/or investment portfolio(s)	1	0	0	0	0
The financial institution discloses its financed emissions - meaning the absolute scope 1, 2, and 3 emissions associated with the companies in its lending and/or investment portfolio(s)	0	0	0	0	0
For large scale project financing, the financial institution requires an environmental impact assessments that include data on greenhouse gas emissions and climate risks.	n.a.	n.a.	n.a.	0	0

For its financed and invested greenhouse gas emissions, the financial institution establishes short, medium and long-term absolute reduction objectives that are aligned with limiting the maximum global temperature increase to 1.5°C.	0	0	0	0	0
The financial institution establishes sector-specific reduction targets for its financed emissions that are aligned with limiting the maximum global temperature increase to 1.5°C.	0	0	0	0	0
The financial institution measures and discloses climate-related impacts in line with IFRS S2 Climate-related Disclosures or the recommendations by the Task Force on Climate-related Financial Disclosures.	0	0	0	0	0
The following elements are crucial for a policy regarding fossil fuels:					
Companies involved in the development of new thermal coal mines are excluded from investment and financing.	0	0	0	0	0
Companies involved in the development of new coal-fired power plants are excluded from investment and financing.	0	0	0	0	0
Companies involved in the development of new metallurgical coal mines and expansion of existing mines are excluded from investment and financing.	0	0	0	0	0
The financial institution excludes financing and investing in companies active in thermal coal mining for more than 20% of their activities.	0	0	0	0	0
The financial institution excludes financing and investing in companies active in coal fired power for more than 20% of their activities.	0	0	0	0	0

The financial institution excludes financing and investing in companies that produce more than 10Mt of thermal coal per year and/or have more than 5GW in coal power capacity.	0	0	0	0	0
The financial institution has a time-bound phase-out strategy for coal that is aligned with a 1.5-degree climate scenario.	0	0	0	0	0
The financial institution fully excludes financing and investing in companies active in thermal coal mining and/or coal fired power generation.	0	0	0	0	0
Companies engaged in new oil and gas exploration and development are excluded from investment and financing.	0	0	0	0	0
The financial institution has a time-bound phase-out strategy for oil and gas that is aligned with a 1.5 degree scenario.	0	0	0	0	0
Companies active in the extraction of oil from tar sands are excluded from investment and financing.	0	0	0	0	0
The financial institution excludes financing and investing in companies active in oil and gas extraction for more than 30% of their revenues.	0	0	0	0	0
The financial institution excludes financing and investing in companies active in oil and gas-fired power generation for more than 30% of their electricity generated.	0	0	0	0	0
The financial institution fully excludes financing and investing in companies active in oil and gas extraction and/or fossil fuel fired power generation.	0	0	0	0	0
The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:					
Companies disclose their scope 1, 2, and 3 greenhouse gas emissions.	0	0	0	0	0

Companies reduce their scope 1, 2, and 3 emissions in line with a 1.5-degree scenario.	0.5	0	0.5	1	0
Companies report emissions of air pollutants identified as having the largest impact on human health.	0	0	0	0	0
Companies have systems in place to ensure that there is zero deforestation and forest degradation in their operations and supply chain.	0	0	0	0	0
Conversion of peatland and high-carbon stocks for agricultural development is unacceptable.	0	0	0	0	0
Companies involved in 1) food- and feed-based biofuels OR 2) food- and feed-based power generation are excluded from investment and financing.	0	0	0	0	0
Companies do not participate in direct or indirect lobbying (attempting to influence decisions made by regulators) aimed at weakening climate policy.	0	0	0	0	0
Companies disclose all ISDS claims they have filed against governments, including the objective of the ISDS claim and an explanation about how the ISDS claim relates to their climate policies.	0	0	0	0	0
Companies integrate criteria on climate change in their procurement and operational policies.	0	0	0	0	0
Companies include clauses on the compliance with criteria on climate change in their contracts with subcontractors and suppliers.	0	0	0	0	0
Total scores	0.7	0	0.2	0.3	0
Total scores expressed as percentage	7%	0%	2%	3%	0%

A.3 CORRUPTION

Assessment Elements	**Bank B**	**Bank A**	**Bank D**	**Bank C**	**Bank E**
The following elements are crucial for a policy regarding the financial institution's internal operations:					
Offering, promising, giving and requiring, either directly or indirectly, bribes and other undue advantages in order to acquire and to maintain assignments and other undue advantages, is unacceptable.	1	0	0	0.5	0

The financial institution has an anti-money laundering policy.	1	0	0	0.5	0
The financial institution has a policy to prevent terrorist financing and financing of proliferation.	1	0	0	0	0
The financial institution properly verifies the ultimate beneficial owner(s) of a company.	0	0	0	0	0
The financial institution reports on its participation in the decision-making processes of international norms and legislation (lobby practices).	0	0	0	0	0
The financial institution has a policy against making political contributions.	0	0	0	0	0
The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:					
Companies publicly disclose their ultimate beneficial owner or owners including full name, date of birth, nationality, jurisdiction of residence, number and categories of shares, and if applicable the proportion of shareholding or control .	0	0	0	0	0
Offering, promising, giving and requiring, either directly or indirectly, bribes and other undue advantages in order to acquire and to maintain assignments and other undue advantages, is unacceptable.	0	0	0	0	0
Companies report on their participation in the decision-making processes of international norms and legislation (lobby practices).	0	0	0	0	0
Companies integrate criteria on corruption in their procurement policies and operational policies.	0	0	0	0	0

Companies include clauses on the compliance with criteria on corruption in their contracts with subcontractors and suppliers.	0	0	0	0	0
Total scores	2.7	0	0	0.9	0
Total scores expressed as percentage	27%	0%	0%	9%	0%

A.4 GENDER EQUALITY

Assessment Elements	**Bank B**	**Bank A**	**Bank D**	**Bank C**	**Bank E**
The following elements are crucial for a policy regarding the financial institution's internal operations:					
The financial institution has made a public commitment to gender equality through a stand-alone gender strategy or has incorporated gender equality and women's empowerment into its business strategy.	0	0	0.5	0	0
The financial institution provides trainings to address gender-based discrimination and biases in the workplace.	0.5	0	0	0	0
The financial institution actively manages equal remuneration.	0	0	1	0	0
The financial institution has systems in place to prevent and mitigate gender discrimination of its customers.	0	0.5	0	0	0
The financial institution guarantees 40-60% participation and equal access for women on the Board of Directors, Executive positions, and Senior management level.	0	0	0	0	0
The financial institution provides targeted professional development for employees to promote equal access for women to senior level positions.	1	1	1	1	0

The financial institution demonstrates its commitment to family life and work-life balance by supporting childcare, parental leave, and other care responsibilities (e.g., breastfeeding, dependent care).	0.5	0	0	0	0
The following elements are related to the financial institution's transparency and strategy:					
The financial institution discloses the % of financing to women-owned businesses OR other vulnerable groups, on the total amount of financing to MSMEs.	0	0	0	0	0
The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:					
Companies have made a public commitment to gender equality through a stand-alone gender strategy or have incorporated gender equality and women's empowerment into their business strategy.	0	0	0	0	0
Companies provide trainings to address gender-based discrimination and biases in the workplace.	0	0	0	0	0
Companies actively manage equal remuneration.	0.75	0	0.5	1	0
Companies have systems in place to prevent and mitigate gender discrimination of their customers.	0	0	0	0	0
Companies guarantee 40-60% participation and equal access for women on the Board of Directors, Executive positions, and Senior management level.	0	0	0	0	0
Companies provide targeted professional development, and where necessary also education and training, for employees to promote equal access for women to senior level positions.	0	0	0	0	0

Companies include gender and women's rights criteria in their procurement and operational policies.	0	0	0	0	0
Companies include clauses on the compliance with gender and women's rights criteria in their contracts with subcontractors and suppliers.	0	0	0	0	0
Total scores	1.7	0.9	1.9	1.3	0
Total scores expressed as percentage	17%	9%	19%	13%	0%

A.5 Human Rights

Assessment Elements	**Bank B**	**Bank A**	**Bank D**	**Bank C**	**Bank E**
The following elements are crucial for a policy regarding the financial institution's internal operations:					
The financial institution is committed to respecting internationally recognised human rights standards and meeting the corporate responsibility to respect human rights as defined in the UN Guiding Principles on Business and Human Rights.	1	0	0	0	0
The financial institution has a zero-tolerance policy towards all forms of discrimination in employment and occupation, on the basis of gender, race, ethnicity, sexual orientation (including LGBTQIA+), and physical ability.	0	0	0	0	0
The following elements are crucial for a policy regarding the financial institution's management of its portfolio of corporate loans and investments:					
The financial institution recognises that it can be directly linked to human rights adverse impacts through its lending and/or investment activities and commits to use leverage to enable remedy when such situations occur.	0	0	0	0	0
The financial institution commits to engaging and respecting the freedom of expression of human rights defenders.	0	0	0	0	0

The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:					
Companies respect all human rights as described in the United Nations Guiding Principles on Business and Human Rights.	0.75	0	0.5	1	0
Companies have processes to enable the remediation of any adverse human rights impact which they cause or to which they contribute.	0.75	0	0.5	1	0
Companies establish or participate in effective operational-level grievance mechanisms for individuals and communities who may be adversely impacted.	0	0	0	0	0
Companies respect the rights of indigenous peoples during the course of their operations.	0.75	0	0.5	1	0
Companies prevent conflicts over land rights and acquire natural resources only by engaging in meaningful consultation with local communities and obtaining free, prior and informed consent (FPIC) when it concerns indigenous peoples.	0.75	0	0.5	1	0
Companies prevent conflict over land rights and acquire natural resources only with free, prior and informed consent (FPIC) of peoples with customary tenure rights.	0	0	0	0	0
Companies operating in contexts where civic space is restricted, commit to protecting the rights of human and environmental rights defenders (CSOs, trade unions, activists, journalists, etc.)	0	0	0	0	0
Companies conduct heightened human rights due diligence on all operations and business relationships in Conflict-Affected and High-Risk Areas, to identify, prevent, mitigate and account for how they address the heightened risks in these areas	0	0	0	0	0

Companies have special attention for respecting the rights of persons with disabilities.	0	0	0	0	0
Companies do not enable settlements, including their economic activities, in occupied territories in respect of International Humanitarian Law.	0	0	0	0	0
Companies integrate human rights criteria into their procurement and operational policies.	0	0	0	0	0
Companies include clauses on compliance with human rights criteria in their contracts with subcontractors and suppliers.	0	0	0	0	0
Total scores	2.5	0	1.3	2.5	0
Total scores expressed as percentage	25%	0%	13%	25%	0%

A.6 Labour Rights

Assessment Elements	**Bank B**	**Bank A**	**Bank D**	**Bank C**	**Bank E**
The following elements are crucial for a policy regarding the financial institution's internal operations:					
The financial institution respects the ILO Declaration on Fundamental Principles and Rights at Work.	1	0	0	0	0
The financial institution integrates at least the labour standards of the ILO Declaration on Fundamental Principles and Rights at Work in its procurement policies.	0	0	0	0	0
The financial institution respects the ILO Maternity Protection Convention.	0	0	0	0	0

The financial institution establishes procedures for managing and processing employee complaints and solve labour rights violations, preferably in consultation with the relevant trade union.	0	0	0	0	0
The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:					
Companies uphold the freedom of association and the effective recognition of the right to collective bargaining.	0.75	0	0.5	1	0
All forms of forced and compulsory labour are unacceptable.	0.75	0	0.5	1	0
Child labour is unacceptable.	0.75	0	0.5	1	0
Companies are committed to preventing discrimination in employment and promoting fair recruitment practices.	0.75	0	0.5	1	0
Companies pay a living wage to their employees.	0	0	0	0	0
Companies apply a maximum of working hours (maximum 48 hours per week plus 12 hours of overtime).	0	0	0	0	0
Companies have a comprehensive health and safety policy.	0.75	0	0.5	1	0
Companies respect the ILO Maternity Protection Convention	0	0	0	0	0
Companies ensure equal treatment and working conditions for migrant workers and pay special attention to informal workers.	0.5	0	0.5	1	0
Companies provide decent working conditions to homeworkers.	0	0	0	0	0

Companies establish procedures on how to deal and process employee complaints and to solve violations and conflicts, preferably in consultation with the relevant trade union.	0.75	0	0.5	1	0
Companies integrate labour rights in their procurement policies.	0.75	0	0.5	1	0
Companies include clauses on the compliance with criteria on labour rights in their contracts with subcontractors and suppliers.	0.75	0	0.5	1	0
Total scores	4.4	0	2.6	5.3	0
Total scores expressed as percentage	44%	0%	26%	53%	0%

A.7 Taxes

Assessment Elements	**Bank B**	**Bank A**	**Bank D**	**Bank C**	**Bank E**
The following elements are crucial for a policy regarding the financial institution's internal operations:					
For at least three quarters of the countries in which the financial institution operates and/or 75% of its total revenue,	0.5	1	1	1	1
For each country in which the financial institution operates, it reports country-by-country on its revenues, profits, FTEs, subsidies received from governments and tax payments to governments in a way that matches with the consolidated account.	0.5	1	1	1	1
For each country in which the financial institution operates, it reports country-by-country on its total assets in a way that matches with the consolidated account.	0	1	1	1	1
The financial institution publishes key information of any company-specific tax ruling it has obtained from tax authorities.	0	0	0	0	0

The financial institution does not have subsidiaries, branches or associates in jurisdictions with no or zero corporate tax or in jurisdictions with harmful corporate tax practices, unless they havesubstance and their profits are generated by from local economic activities.	1	1	1	1	1
The financial institution does not provide financial services to companies in tax havens, unless the company has substance and its profits are generated by from local economic activities.	0	0	0	0	0
The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:					
Companies publish their full group structure, including indirectly and jointly-owned entities.	0	0	0	0	0
Companies publish an explanation of the activities, functions and ultimate shareholder of every subsidiary, branch, joint venture or affiliates located in jurisdictions with no or zero corporate tax practices or in jurisdictions with harmful corporate tax practices.	0	0	0	0	0
For each country in which companies operate, they report country-by-country on their revenues, profit, FTEs, subsidies received from governments and payments to governments (e.g. withholding taxes, payments for concessions and company tax).	0	0	0	0	0
Companies focus their international enterprise structure and their international transactions in a way that reflects the economic substance of the activities and transactions undertaken, without any steps made primarily to secure a tax advantage.	0	0	0	0	0
Companies publish key information of any company-specific tax ruling it has obtained from tax authorities.	0	0	0	0	0

Companies make public, to the extent legally and practically possible, the decision of any adjudication or arbitration to which it, or any of its subsidiaries, is a party, undertaken to resolve a tax dispute, whether in a court or in an arbitration setting.	0	0	0	0	0
Companies have a management system which results in immediate actions if suspicions arise that employees or suppliers are guilty of facilitating tax avoidance or evasion.	0	0	0	0	0
Companies integrate criteria on tax in their procurement policies and operational policies.	0	0	0	0	0
Companies include clauses on the compliance with criteria on tax in their contracts with subcontractors and suppliers.	0	0	0	0	0
Total scores	1.3	2.7	2.7	2.7	2.7
Total scores expressed as percentage	13%	27%	27%	27%	27%

A.8 Transparency and Accountability

Assessment Elements	**Bank B**	**Bank A**	**Bank D**	**Bank C**	**Bank E**
The following elements are crucial for a policy regarding the financial institution's internal operations:					
The financial institution describes its finance and investment framework regarding environmental and social issues and provides insight into how the financial institution ensures that investments meet the conditions set in its policies.	1	0	0.5	0	0
The financial institution publishes the names of companies in which it invests.	0	0	0	0	0
The financial institution mentions all companies (on its website) to which it grants new credit.	0	0	0	0	0

The financial institution mentions all companies (on its website) to which it has granted credit.	0	0	0	0	0
The financial institution discloses the names of all outstanding project finance transactions and project-related corporate loans, including the information required by the Equator Principles 4.	0	n.a.	0	0	0
The financial institution publishes a breakdown of its portfolio by region, size and industry.	0.8	0.5	0.5	1	1
The financial institution publishes a sufficiently detailed breakdown of its portfolio, for example, based on the first two digits of NACE and ISIC or other relevant national classification system.	0	0	0	0	0
The financial institution publishes the number of companies with which it has engaged on social and environmental topics.	0	0	0	0	0
The financial institution publishes the names of companies with which it has engaged on social and environmental topics.	0	0	0	0	0
The financial institution publishes the results of engagement on social and environmental topics, including the topics, goals and deadlines.	0	0	0	0	0
The financial institution publishes the names of companies that are excluded from investment and financing due to sustainability issues, including the reasons for this exclusion.	0	0	0	0	0
The financial institution discloses a voting policy which explains how environmental and social issues are integrated into its voting decisions.	0	0	0	0	0
The financial institution publishes its voting record.	0	0	0	0	0

The financial institution publishes a sustainability report that is set up in accordance with recognised sustainability reporting framework.	1	0.5	0.5	1	0
The financial institution's sustainability report has been verified externally.	0	0	0	0	0
The financial institution reports on the consultation with civil society organisations and other stakeholders.	1	0	0.5	0	0
The financial institution provides a breakdown of the volume of assets that are managed internally and/or externally.	n.a.	n.a.	n.a.	n.a.	n.a.
The financial institution discloses the names of external asset managers.	n.a.	n.a.	n.a.	n.a.	n.a.
The financial institution has set up mechanisms to ensure engagement and voting practices of external asset managers or service providers comply with their sustainability policies.	n.a.	n.a.	n.a.	n.a.	n.a.
The financial institution has a complaint mechanism for individuals and communities that may be adversely affected by activities that it is connected to, and the scope of the complaint mechanism covers financed activities.	0	0	0	0	0
The financial institution has set up a grievance mechanism that is accessible, and clearly explains its process for managing complaints.	0	0	0	0	0
The financial institution reports on the progress and performance of its grievance mechanism or complaint mechanism open to stakeholders external to the bank.	0	0	0	0	0
The financial institution commits to respecting and cooperating in good faith with State-based non-judicial and judicial mechanisms when cases that it is connected to are brought to such a mechanism.	0	0	0	0	0
Total scores	1.9	0.5	1	1	0.5
Total scores expressed as percentage	19%	5%	10%	10%	5%

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