

UN  
environment  
programme



finance  
initiative

Principles for  
Responsible Banking



# SPUERKEESS

## Responsible Banking Progress Statement for PRB Signatories



In October 2019, Spuerkeess became a signatory to the United Nations Environment Programme Finance Initiative's (UNEP FI) *Principles for Responsible Banking* (hereinafter referred to as "the Principles"). This commitment forms an integral part of our broader sustainability strategy and reflects our dedication to responsible banking practices.

By endorsing the Principles, Spuerkeess has committed to progressively aligning its strategy, governance, and operations with the United Nations Sustainable Development Goals (SDGs) and the objectives of the Paris Agreement. This includes setting measurable targets, integrating sustainability into our business model, and transparently reporting on our progress through annual disclosures.

The tables below outline the reporting and self-assessment requirements for signatories of the Principles. They serve as our formal response and self-evaluation regarding our implementation of the Principles, and include references and links to supporting information and documentation—both within our existing reporting framework and in publicly accessible sources.

# Summary template

## SPUERKEESS 2024

*Banks should fill in the following summary table, utilizing the italicized prompts.*

<b>Principle 1:</b> <b>Alignment</b>	<b>Principle 2:</b> <b>Impact &amp; Target Setting</b>	<b>Principle 3:</b> <b>Clients &amp; Customers</b>
<p><b>Content</b>  <i>Briefly describe your bank's sustainability strategy, and which international, regional or national frameworks and UN Sustainable Development Goals it aims to align with. Note any changes in the reporting year.</i></p> <p><b>Business model:</b>  The Bank continues to follow the same frameworks and applies the same standards as in the previous year. Additionally, Spuerkeess also signed the Women in Finance Charter.</p> <p>The SDGs it aligns with are:  3,4,5,8,9,10,11,12,13,17.</p> <p><b>Sustainability Strategy:</b>  Spuerkeess' sustainability strategy is built on three main pillars:</p> <ul style="list-style-type: none"> <li>- Striving for climate neutrality;</li> <li>- Investing in a sustainable future;</li> <li>- Acting responsibly and with commitment.</li> </ul> <p>The table below summarizes the integration of the strategy into the business model:</p>	<p><b>Content</b>  <i>Briefly describe the bank's most significant impact areas and the steps taken to identify, measure and manage them—including impact analysis results, targets set (including sectors, portfolio coverage, and KPIs), actions taken, and progress against the targets. Where targets have been set, share details of the bank's transition/action plan, and progress made. Explain how the bank addressed interlink- ages between impact areas where possible.</i></p> <p><b>Example Progress Indicators</b></p> <ul style="list-style-type: none"> <li>▪ % of bank's portfolio covered by the impact analysis and each set target</li> <li>▪ Updated values of KPIs defined by bank to measure progress against targets</li> </ul> <p><b>Impact analysis:</b></p> <p>In 2024, Spuerkeess expanded its scope of impact analysis by conducting a double materiality assessment in alignment with the ESRS framework and identified six material topics, including:</p> <ul style="list-style-type: none"> <li>- Climate Change (ESRS E1)</li> <li>- Own Workforce (ESRS S1)</li> <li>- Consumers and End-users (ESRS S4)</li> </ul>	<p><b>Content</b>  <i>Briefly describe how the bank works responsibly with clients and customers in relation to significant impacts, including products and services offered, internal policies and processes and engagement to implement targets/action plans/transition plans to encourage sustainable practices/economic activities. Note any changes in the reporting year.</i></p> <p><b>Example Progress Indicators</b></p> <ul style="list-style-type: none"> <li>▪ % of clients and/or customers engaged in key sectors in areas of significant impact.</li> <li>▪ USD sustainable finance volume mobilized and/or as a percentage of the global or sector portfolio</li> </ul> <p>Spuerkeess works responsibly with clients and customers by embedding sustainability and responsibility into product development, service delivery, and client engagement. A risk-based approach is used to design and manage products, with regular evaluations and corrective actions to address any negative impacts. A fair marketing policy ensures transparent, responsible, and non-misleading communication.</p> <p>To manage significant impacts in lending, the Bank applies robust internal policies and</p>

[illegible]

More detailed information about our products' and services' key figures can be found in our annual report "Report and balance sheet 2024".

- Business Conduct (ESRS G1)
- Supporting Clients in their Ecological and Social Transition
- Respect for Human Rights

However, it is important to note that “supporting clients in their ecological and social transition” and “respect for human rights” are voluntary topics that we have added due to our commitments. These topics are not covered by the ESRS standards.

The six material topics mentioned earlier have been identified in accordance with the CSRD requirements. However, Spuerkeess will continue to prioritize climate change and financial inclusion within the Principles for Responsible Banking report, as these remain key focus areas.

The table below summarizes the integration of the strategy into the business model:

[illegible]

For financial inclusion, new research was conducted in the context of the UNEP FI Accelerator Programme, leading to a refined understanding of vulnerable populations in

monitoring processes, particularly regarding credit risk. Regarding fraud prevention, targeted anti-phishing awareness campaigns and regular updates to the digital platform (S-Net) enhance client protection.

The Bank collects client feedback through satisfaction surveys (e.g., digital mortgage loans), participation in the ABBL Retail Banking Survey, a Net Promoter Score (NPS), and client panels. These tools help tailor services to client needs and expectations.

Additionally, it promotes sustainable practices through its product offering. The alternative savings account, in partnership with Etika ASBL, enables clients to forgo part of their return to support ESG-aligned projects. In 2024, this program financed 273 projects — 55,56% in social housing, 33,33% in renewable energy, and 11,11% in education.

To ensure inclusion and accessibility, Spuerkeess provides assistance to clients transitioning to digital services via staff support and seminars, while maintaining in-person appointments. Communications are delivered in the country's three official languages. Services are accessible through a multichannel approach, including branches, phone/email via Spuerkeess Direct, and digital platforms (S-Net).

Spuerkeess also launched a Transition Enabler program to support SMEs in addressing transition-related challenges. More information about the Programme can be found [here](#): [“Spuerkeess: Neutralité carbone: Les initiatives de la banque Spuerkeess”](#).

Clients have free access to an ESG maturity assessment tool. The data collected informs credit evaluations by integrating transition risk. Clients have also access to a full ecosystem of

	<p>Luxembourg and the identification of priority target groups, such as low-income individuals, women, youth, the elderly, persons with disabilities. Key gaps were also identified, including access to credit, financial literacy, and income inequality, with aligned goals such as contributing to national poverty reduction targets and promoting gender equity.</p> <p>In terms of performance measurement, the Bank expanded its financed emissions coverage to include all NACE sectors. For financial inclusion, while no specific KPIs have been formalized yet, work is ongoing to identify relevant indicators beyond general measures like access, affordability, and usage.</p> <p>All other elements, including the climate change approach, remained unchanged during the reporting year.</p> <p><b>Target implementation:</b></p> <p><u>Climate Change:</u> No changes occurred in 2024 regarding alignment, baseline, or action plan. However, to comply with CSRD requirements, Spuerkeess conducted a double materiality assessment, expanded the coverage of financed emissions by including Scope 1, 2, and 3 emissions for all non-climate-relevant sectors in its corporate bonds and business loans portfolio, and enhanced stakeholder engagement with key corporate clients and SMEs through its Transition Enabler programme.</p> <p>Specific climate targets for the corporate equities and bonds portfolio, as well as residential mortgage loans, are outlined in the sustainability section of the Bank's annual report</p>	<p>experts to support and guide them in their transition journey.</p> <p>To conclude, in the reporting year, key changes included enhanced digital security, the launch of client feedback mechanisms, the introduction of the Transition Enabler program, and further expansion of ESG-based financing by partnering with Erste Asset Management.</p>
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	<p>“Report and balance sheet 2024”. Further details are available in the chapter “1.2.2 Empreinte carbone de nos activités bancaires”.</p> <p><u>Financial Inclusion:</u> The Bank began a re-evaluation of its financial inclusion strategy by participating in UNEP FI workshops and the Accelerator Programme, aiming to define a solid baseline and measurable targets. While no specific targets were set in the reporting year, internal workshops with relevant departments are planned to strengthen internal alignment and advance the Bank’s approach to financial inclusion.</p> <p>More information can be found under the template of Principle 2.</p>	
<p><b>Links &amp; references</b> [References to where additional information can be found in external reporting. Include links and page numbers,]</p> <p><u>Sustainability section of the Bank’s annual report “Report and balance sheet 2024”</u></p> <p>ESRS 2 - (SDGs) 3.1. Une stratégie prenant en compte la chaîne de valeur complète de Spuerkeess 3.2 Notre stratégie en matière de durabilité 3.3 Intégration de la stratégie dans le modèle d'affaires</p> <p><u>Bank’s annual report “Report and balance sheet 2024”</u></p> <p>Comptes annuels - 4.2 Prêts et avances au coût amorti – Etablissements de crédit</p>	<p><b>Links &amp; references</b> [References to where additional information can be found in external reporting. Include links and page numbers,]</p> <p><u>Sustainability section of the Bank’s annual report “Report and balance sheet 2024”</u></p> <p>ESRS E1 - 1.2.2 Empreinte carbone de nos activités bancaires</p> <p><a href="#">BCE 2757_25_RapportRSE-BilanR2024 inside_r16-xtra.pdf</a></p>	<p><b>Links &amp; references</b> [References to where additional information can be found in external reporting. Include links and page numbers,]</p> <p><u>Sustainability section of the Bank’s annual report “Report and balance sheet 2024”</u></p> <p>ESRS S4 - Consommateurs et utilisateurs finaux ESRS 2 - (SDGs) 3.1. Une stratégie prenant en compte la chaîne de valeur complète de Spuerkeess ESRS S4 – 3.5 Programme Transition Enabler</p> <p><a href="#">BCE 2757_25_RapportRSE-BilanR2024 inside_r16-xtra.pdf</a></p> <p><a href="#">Spuerkeess: CSR Policy of Spuerkeess</a></p>

<p>4.3 Prêts et avances au coût amorti - Clientèle</p> <p><a href="#">BCE_2757_25_RapportRSE-BilanR2024_inside_r16-xtra.pdf</a></p> <p><i>EBA P3: Partie ESG – Template 1</i></p> <p><a href="#">Informations générales</a></p>		<p><a href="#">Spuerkeess: Transition Enabler</a></p>
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## Principle 4: Stakeholders

### Content

Briefly describe how the bank consults, engages and collaborates/partners with relevant stakeholders for the purpose of implementing the Principles. This could include understanding impacts, setting ambitious targets, advocating for enabling regulatory/policy environments, and creating partner- ships that contribute to addressing significant impacts. Note any changes in the reporting year.

This table summarizes how the Bank engages with relevant stakeholders:

Chaîne de Valeur	Parties prenantes	Classement	
		Parties impactées directement par les activités de la Banque	Parties utilisant ou influençant les services de la Banque
Actionnaires	LCB	x	x
Régulateurs et Autorités	Régulateurs, Autorités de supervision		x
Associations	Associations professionnelles (p.ex. ABBL, ...)		x
Fournisseurs et partenaires commerciaux	Fournisseurs et partenaires commerciaux	x	
Activités principales	Activités principales	x	
Sous-comités	Organes de gouvernance de Spuerkeess	x	x
Fonctions internes	Personnel de la Banque	x	
Clients	Particuliers, indépendants, PME, Entreprises, ...	x	x
Participations/Filiates	Spuerkeess Asset management et Spuerkeess RE	x	

The Bank ensures constructive stakeholder engagement by following three principles:

- Careful selection of representatives.
- Targeted involvement in specific topics.
- Mixed approach using quantitative and qualitative methods.

Spuerkeess uses workshops for materiality analysis, facilitating the understanding of CSRD objectives. The process is validated by internal teams and governance bodies. The consultation will be expanded to direct methods like questionnaires and interviews.

## Principle 5: Governance & Culture

### Content

Briefly describe the key governance structures in place (Board and Executive level) and related accountability mechanisms to implement the Principles. This could include how governance supports your bank's management of significant impacts and risks, including target implementation and monitoring of action/transition plans. In addition, briefly describe how a culture of responsible banking is driven internally (e.g. via employee learning & development). Note any changes or progress in the reporting period.

### Example Progress Indicators

- Details of remuneration practices linked to sustainability targets.
- % of employees trained on responsible banking topics.

### Governance structure for implementation of the Principles:

The Sustainability Committee was established in the reporting year 2024 and has been entrusted with the oversight of the Bank's voluntary ESG commitments. It is responsible for reviewing and updating ESG-related policies, ensuring alignment and consistency across all ESG initiatives and projects, and validating the ESG training plan. The Committee also evaluates partnerships related to ESG matters. In addition, it ensures effective coordination, monitoring, and overall coherence of the sustainability actions undertaken across the Bank. It facilitates the cross-functional sharing of knowledge and

## Principle 6: Transparency & Accountability

### Content

Provide reference to additional relevant reports, if not listed as references with P1–P5.

Briefly note whether/where assurance of sustainability information has been undertaken (optional).

### Reporting on other frameworks:

The assurance statement on our PRB commitments was not performed in 2024. However, assurance on the sustainability information in our sustainability report was undertaken by an external reviewer.

For 2024 onwards, we apply the ESRS standards adopted in the context of the CSRD that Spuerkeess is subject to, instead of the GRI standards that were used in 2023.

Furthermore, we report our sustainability information in accordance with **the Article 8 of the EU Taxonomy Regulation**, with the **UN Principles for Responsible Banking**, the **Net Zero Banking Alliance** and with the **PCAF methodologies** for our GHG financed emissions.

Additionally, we have conducted a double materiality assessment as required by the CSRD.

Based on the list of pre-identified topics, Spuerkeess has mapped the associated IROs (Impacts, Risks, and Opportunities) to each theme, sub-theme, and sub-sub-theme, in accordance with the requirements of the ESRS standards. To assess the relevance of the pre-identified topics, selected stakeholders were consulted. The IROs considered significant by Spuerkeess' stakeholders

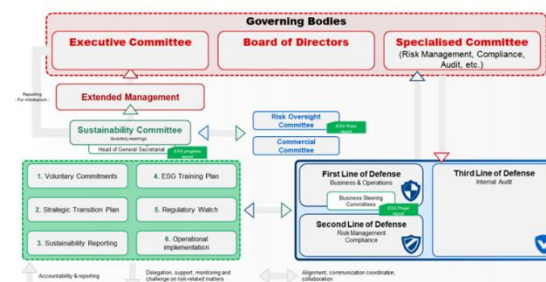


Further details on the identification, engagement, and interaction of our stakeholders can be found in our annual report “Report and balance sheet 2024”, accessible via the links provided in the box below.

information on sustainability-related challenges and promotes transversal coordination and consultation in the development and implementation of the Bank’s strategic transition plan.

On the other hand, Spuerkeess’ Extended Management has been granted a decision-making power on sustainability and climate-related issues. It is responsible for defining the strategic and commercial dimensions of the Bank’s ESG program. It formulates proposals to the governing bodies regarding the ESG strategy and its periodic updates, while ensuring that the objectives outlined in both the ESG strategy and program are achieved within the established timeframes. Moreover, the Extended Management validates the recommendations given by the Sustainability Committee concerning the strategic orientations and roadmap required to meet the Bank’s sustainability targets. It also approves the key performance indicators related to sustainability, in alignment with the Bank’s ESG strategic framework.

Les différents acteurs de la gouvernance et leurs interactions :



More information on sustainability-related skills and expertise can be found at “4.4 “Compétences et expertise en matière de

helped determine the material topics to be included in the Bank’s sustainability section of the annual report.

Furthermore, the list of IROs identified as part of the double materiality assessment was reviewed and compared with the comprehensive ESG risk evaluation and the way these risks may affect the Bank across different time horizons. This analysis also guides reporting decisions under the sustainability standards (ESRS). It is based on an assessment of ESG indicators derived from both internal and external sources. In addition to the pre-identified topics from the ESRS, the Bank has identified two additional topics: supporting clients in their ecological and social transition (through financing, investment, and dedicated programs) and the respect for human rights.

Thus, the Bank will further engage in these topics and take concrete actions to support their integration into its strategy and operations.

More detailed information can be found in the report.

	<p>durabilité” in the sustainability section of our annual report “Report and balance sheet 2024”.</p> <p><b>Sustainability-related incentives and remuneration:</b>  Members of the Board of Directors receive a quarterly fixed fee and attendance fees for participating in meetings and training sessions. Extraordinary work allowances may be granted annually to staff, including the Executive Committee, based on years of service, subject to approval by the Board and the Government Commissioner. Spuerkeess does not apply variable remuneration based on qualitative performance or risk-taking but rather on strategic alignment with ESG topics. Until this day, no formal sustainability objectives have been defined, and thus, no performance criteria related to sustainability are used in the evaluation or remuneration of governance bodies, nor are such elements disclosed.</p> <p><b>Promote a culture of responsible banking:</b>  We have redesigned our ESG training program by creating dedicated training content for employees across the Bank and tailored modules for functions specifically impacted by ESG within the Bank.</p> <p><b>Policies and due diligence processes:</b>  More detailed information about the identification, management, assessment, mitigation, and monitoring of environmental and social risks can be found in the report linked below.</p>	
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<p><b>Links &amp; references</b> [References to where additional information can be found in external reporting. Include links and page numbers,]</p> <p><u>Sustainability section of the Bank's annual report "Report and balance sheet 2024"</u></p> <p>ESRS 2 - 5.2 Engagement des parties prenantes 5.3 Méthodologie</p> <p><a href="#">BCE 2757 25 RapportRSE-BilanR2024 inside r16-xtra.pdf</a></p>	<p><b>Links &amp; references</b> [References to where additional information can be found in external reporting. Include links and page numbers,]</p> <p><u>Sustainability section of the Bank's annual report "Report and balance sheet 2024"</u></p> <p>ESRS 2 - 2. Gestion des risques et contrôles internes 3.1.2 Opérations internes 4.2 Responsabilités et supervision des impacts, risques et opportunités</p> <p>4.4 Compétences et expertise en matière de durabilité</p> <p>4.5 Principales responsabilités des différents organes et rôle décisionnel</p> <p>4.6 Incitations et rémunération liées à la durabilité</p> <p>ESRS E1 - 2. Cadre de gestion des risques climatiques et environnementaux 3. Définition des risques climatiques et environnementaux 4. Identification et évaluation de la matérialité des risques climatiques et environnementaux 5. Analyse des scénarios climatiques et tests de résilience</p> <p>ESRS E1 - 1.2.2. Empreinte carbone de nos activités bancaires</p>	<p><b>Links &amp; references</b> [References to where additional information can be found in external reporting. Include links and page numbers,]</p> <p><u>Sustainability section of the Bank's annual report "Report and balance sheet 2024"</u></p> <p>ESRS 2 - 5.4 Introduction aux Impacts, Risques et Opportunités (IROs) et à la méthodologie de scoring</p> <p>ESRS E1 - 1.2.1. L'empreinte carbone de nos opérations propres</p> <p><a href="#">BCE 2757 25 RapportRSE-BilanR2024 inside r16-xtra.pdf</a></p> <p><u>EBA P3: Partie ESG – Template 1</u></p> <p><a href="#">Informations générales</a></p> <p><u>Human rights report</u></p> <p><a href="#">PNEDH Rapport 2024 Spuerkeess version à publier</a></p>
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	<p>ESRS S1 – Effectifs de l’entreprise</p> <p><a href="#">BCE_2757_25_RapportRSE-BilanR2024_inside_r16-xtra.pdf</a></p> <p><a href="#">Spuerkeess: CSR Policy of Spuerkeess</a></p>	
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# Supplement templates

## 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.

### Business model

Describe (high-level) your bank's business model, including the main business lines, 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, business areas or by disclosing the number of customers and clients served.

Links & references

Response

### Strategy alignment

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 other international frameworks such as the Kunming-Montreal Global Biodiversity Framework (GBF), the United Nations Guiding Principles on Business and Human Rights (UNGPs), the forthcoming instrument on plastic pollution etc.

Include any other national and/or regional frameworks that your bank has a strategy to align with where relevant.

Links & references

Response

## Principle 2: Impact & 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.

### Impact Analysis

Show how your bank has identified, prioritized and measured the most significant impacts associated with its portfolio (both positive and negative). Determine the priority areas for target- setting. Include details regarding: Scope, Portfolio Composition, Context, and Performance Measurement.

The impact analysis should include assessment of the relevance of the four priorities laid out in [Leading the Way to a Sustainable Future: Priorities for a Global Responsible Banking Sector](#), as part of its initial or ongoing impact analysis.

### Links & references

[EBA P3: Partie ESG – Template 1](#)

### [Informations générales](#)

#### [Sustainability section of our annual report “Report and balance sheet 2024”:](#)

ESRS E1 - 1.2.2. Empreinte carbone de nos activités bancaires

ESRS S4 – Consommateurs et utilisateurs finaux

ESRS E1 – Changement climatique: 1.2. Empreinte carbone et plan de transition

ESRS 2 – 5. Analyse de double matérialité (ADM)

ESRS S4 – 3.5 Programme Transition Enabler

[BCE\\_2757\\_25\\_RapportRSE-BilanR2024\\_inside\\_r16-xtra.pdf](#)

### Response

#### Scope:

Spuerkeess conducted impact analyses in 2020 and 2023, identifying two main areas of focus: climate change and financial inclusion. In 2024, we identified six material topics following the ESRS framework. The double materiality assessment highlighted the following relevant subjects for the Bank:

1. ESRS E1 Climate Change
2. ESRS S1 Own Workforce
3. ESRS S4 Consumers and End-users
4. ESRS G1 Business Conduct
5. Supporting Clients in Their Ecological and Social Transition (through financing, investment, and dedicated programs)
6. Respect for Human Rights

However, it is important to note that “supporting clients in their ecological and social transition” and “respect for human rights” are voluntary topics that we have added due to our commitments. These topics are not covered by the ESRS standards. The six material topics mentioned earlier have been identified in accordance with the CSRD requirements. However, Spuerkeess will continue to prioritize climate change and financial inclusion within the Principles for Responsible Banking report, as these remain key focus areas.

The rest remained unchanged since last year. New figures of our main assets and portfolios can be found in our sustainability report linked in the box.

**Portfolio composition:**

Recent information on the exposure per asset and on the most climate relevant sectors can be found in our “EBA ESG Pillar 3 reporting 2024” as well as in our annual report “Report and balance sheet 2024”.

**Context:**

*Stakeholder engagement:* No changes occurred in the reporting year. Further details can be found in question 4.

*Climate change:* No changes occurred in the reporting year.

*Financial inclusion:* As part of the Accelerator Programme of UNEP FI, we conducted research on vulnerable populations in Luxembourg and concluded the following:

1. Groups to prioritize:

- Children and Single-Parent Household: In 2023, the child poverty risk rate reached 24%. Notably, single-parent households are particularly vulnerable, with 44% affected by poverty.
- Elderly population: Persistent poverty risk among the elderly, needing financial products tailored to retirement planning and healthcare needs.
- Low-income households: Around 20% of the population is at risk of poverty or social inclusion. This group requires targeted financial products and services to enhance financial resilience.
- Youth (18-30): Young people, especially students and early-career professionals, face challenges in accessing affordable credit and financial literacy.
- Low-skilled Individuals: People with lower educational qualifications face significant challenges in securing stable, well-paying jobs, making them more vulnerable to poverty.
- Women: Women are disproportionately affected by poverty, particularly single mothers and those employed in part-time or low-wage jobs.
- Foreigners/Migrants/Cross-border workers: Migrants and non-Luxembourgish residents face higher risks of poverty and social exclusion due to language barriers, limited access to certain services, and precarious employment conditions. A significant portion of Luxembourg's workforce comes from neighbouring countries, creating unique financial needs.

2. Goals to which Spuerkeess should contribute:

- Contribute to reducing poverty by 1/6 by 2030 aligning with national commitments under the SDGs.
- Promote financial literacy and digital inclusion.
- Promote gender equity.

3. Most important gaps to close:

- Financial literacy: Especially young people and low-income individuals lack the needed knowledge to make informed financial decisions.
- Access to credit: Limited access to affordable credit for vulnerable groups remains a significant gap.
- Income equality: Reports highlight the need to address income disparities, suggesting a focus on equitable financial services.

Consequently, Spuerkeess has identified the following specific target groups:

- Low-income people.
- Individuals based on gender.
- Individuals based on age.
- Individuals with disabilities.

**Performance measurement:**

*Climate Change:* We focus on code NACE A-H & L, which represent 51% of our total assets as of December 2024, but we enlarged our scopes to all the code NACE sectors for our financed emission.

*Financial inclusion:* At this stage, no specific indicators have been formally defined to measure financial inclusion. The Bank currently relies on general indicators such as access, affordability, and usage of financial products and services. Additional indicators, such as the number of branches with wheelchair accessibility or student loans granted, can also be measured on demand. However, a dedicated and comprehensive list of financial inclusion indicators has not yet been established.



**Targets, Target Implementation, and Action Plans/Transition plans**

Show that your bank has set and published a minimum of two SMART targets which address at least two different areas of most significant impact that your bank identified in its impact analysis. Once targets are set, explain the actions taken and progress made. Include details regarding: Alignment, Baselines, Targets, Target Implementation & Monitoring (and KPIs), Action Plans/ Transition plans and Milestones.

Banks are encouraged to disclose information regarding actions they are taking in four priorities laid out in [Leading the Way to a Sustainable Future: Priorities for a Global Responsible Banking Sector \(2024\)](#).

**Links & references**

ESRS 1 – Changement climatique – Information en matière environnementale

ESRS S4 - 3.5. Programme Transition Enabler – Accompagner nos clients dans la transition vers une économie durable

[BCE\\_2757\\_25\\_RapportRSE-BilanR2024\\_inside\\_r16-xtra.pdf](#)

**Response**

Alignment: No changes occurred in the reporting year for both impacts.

Baseline – Climate Change: No changes occurred in the reporting year for both impacts.

Targets – Climate Change: Please refer to " ESRS E1 – 1.2.2 Empreinte carbone de nos activités bancaires" in our annual report "Report and balance sheet 2024" for detailed information on the specific targets set for our corporate equities and bonds portfolio, as well as our residential mortgage loans portfolio.

Target Implementation & Monitoring:

*Climate Change:* To be compliant with the CSRD requirements, Spuerkeess undertook a double materiality assessment for the 2024 reporting year. Please refer to "Impact Analysis" part for further details.

Furthermore, we increased our coverage rate of our financed emissions calculation by including the Scope 1, 2 and 3 emissions for all the non-climate relevant sectors of our corporate bonds and business loans portfolio.

Regarding our business loans portfolio, we are engaging with some of our most important corporate and SMEs to prepare them for the future reporting requirements. Please refer to our annual report "Report and balance sheet 2024" for further details on our "Transition Enabler" program.

For more details on our equity and corporate bonds portfolio, please refer to the chapter "ESRS E1 – 1.2.2 Empreinte carbone de nos activités bancaires" in our annual report "Report and balance sheet 2024".

Action Plan – Climate Change: No changes occurred during the reporting year. For further details, please refer to the chapter "ESRS E1 – 1.2.2 Empreinte carbone de nos activités bancaires" in our annual report "Report and balance sheet 2024".

**Financial Inclusion:** The Bank is currently re-evaluating its approach to financial inclusion by engaging in UNEP FI workshops and participating in the UNEP FI Accelerator Programme. Although no specific targets have been defined in the reporting year, these initiatives aim to establish a solid baseline and help to formulate clear and measurable targets. Additionally, internal workshops with the relevant departments are being planned to further strengthen internal alignment and accelerate progress on this important topic.

### Principle 3: Clients & 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.

#### Client and Customer engagement

Describe how your bank has worked with and/or is planning to work with its clients and customers to encourage sustainable practices and enable sustainable economic activities. It should include information on the client engagement strategy including but not limited to the impact areas identified/ targets set, awareness raising activities with clients and customers, relevant policies and processes, actions planned/implemented to support clients' transition, selected indicators on client engagement and, where possible, the impacts achieved.

Links & references

Response

#### Business opportunities

Describe what strategic business opportunities in relation to the increase of positive and the reduction of negative impacts your bank has identified and/or how your bank has developed these in the reporting period. Provide information on sustainability-related products and services and frameworks in place that support the transition needs of clients, size of the sustainable finance portfolio in USD or local currency and/or as a % of your bank's portfolio,\* and which SDGs or impact areas you bank is striving to make a positive impact on (e.g. green mortgages—climate, social, sustainability bonds—financial inclusion, etc.).

\* Provide information on the sustainable finance frameworks/standards/taxonomies used to label sustainable finance volumes

Links & references

Response

## Principle 4: Stakeholders

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

### Stakeholder identification and consultation

Describe which stakeholders (or groups/types of stakeholders) your bank has 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 the bank's engagement strategy following criteria for effective engagement and advocacy, how your bank has identified relevant stakeholders, what issues were addressed/results achieved and how they fed into the action planning process.

Links & references

Response

## Principle 5: Governance & Culture

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

### **Governance Structure for Implementation of the Principles**

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 (including accountability at the executive leadership level, clearly defined roles and responsibilities for sustainability matters in internal processes, etc.) and support the effective implementation of the Principles.

Links & references

Response

### **Promoting a culture of responsible banking:**

Describe the initiatives and measures of your bank to foster a culture of responsible banking among its employees (e.g., capacity building, learning & development, sustainability training for relevant teams, inclusion in remuneration structures and performance management and leadership communication, amongst others).

Links & references

Response

### **Risk and due diligence processes and policies**

Describe what processes your bank has installed to identify and manage environmental and social risks associated with your bank's portfolio. This can include aspects such as identification of significant/salient risks, due diligence processes, 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 your bank has in place to oversee these risks.

Links & references

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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.

The information provided in the Responsible Banking Progress Statement is sufficient. If third-party assurance has been undertaken, provide details on the scope of assurance and the reference/link to the Independent (Limited) Assurance Report