

# Bangladesh

## Country Progress Report

March 2022

SUPPLEMENT TO THE 2021 GLOBAL PROGRESS REPORT OF  
THE SUSTAINABLE BANKING AND FINANCE NETWORK



Sustainable  
Banking and  
Finance  
Network



*Creating Markets, Creating Opportunities*

## Acknowledgements

This SBFN Country Progress Report was developed by the SBFN Secretariat under the leadership of the SBFN Measurement Working Group with guidance from SBFN Asia Regional Coordinator, Wei Yuan and Country Coordinators Afifa Raihana and Huong Thien Nguyen. Data was provided by Bangladesh Bank (BB) and verified by SBFN. The team is grateful for the support and guidance of BB representatives who provided data, participated in interviews, and reviewed and provided comments to this report, in particular Khondkar Morshed Millat, General Manager of the Sustainable Finance Department.

## About SBFN

Established in 2012, SBFN is a voluntary community of financial sector regulators and industry associations from emerging markets committed to collectively advancing sustainable finance in line with international good practice and national priorities. As of October 2021, SBFN members represented 63 institutions, 43 countries, and \$43 trillion (86 percent) of the total banking assets in emerging markets. Members are committed to i) improving the management of environmental, social, governance, and climate change risks in financial sector activities, and ii) increasing capital flows to activities with positive environmental and social impacts, including climate change mitigation and adaptation. For more information, visit [www.sbfnetwork.org](http://www.sbfnetwork.org).

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# Contents

## 1

### Overall country progress – Bangladesh

1. SBFN member institutions
2. Other key institutions and national initiatives promoting sustainable finance
3. Overall progress
4. Country sustainable finance journey
5. COVID response
6. Ambitions for the next phase
7. SBFN and IFC role

page 2

## 2

### Progress by three pillars

- Pillar 1: ESG Integration
- Pillar 2: Climate Risk Management
- Pillar 3: Financing Sustainability

page 6

## 3

### Progress by three sub-pillars and 11 indicators

- Sub-pillar 1: Strategic Alignment
- Sub-pillar 2: Regulatory and Industry Association Actions
- Sub-pillar 3: Expectations of Financial Institution Actions

page 12

## 4

### Library of national sustainable finance framework documents

National strategies, roadmaps, policies, voluntary principles, regulations, guidelines, research, templates, and tools that provide an enabling framework for sustainable finance

page 13

## 5

### SBFN measurement framework and methodology

Summary of the SBFN measurement framework, a systematic approach to benchmark country progress in developing national enabling frameworks for sustainable finance

page 14

Note to the reader: All measurement results featured in this document, such as graphs and progression matrixes, are based on data collected up to July 2021. Additional activities up to the publishing date of this country report have been included in narrative form.

# 1. Overall country progress – Bangladesh

## 1.1 SBFN member institution:

[Bangladesh Bank \(BB\)](#)

Member Since: 2012

**Working Groups:**

Measurement

Sustainable Finance Instruments

Data and Disclosure

International Development Association Task Force

## 1.2 Other key institutions and national initiatives promoting sustainable finance

[Chittagong Stock Exchange \(CSE\)](#)

[Ministry of Environment, Forest and Climate Change](#)

[Dhaka Stock Exchange](#)

[Bangladesh Association of Banks \(BAB\)](#)

## 1.3 Overall progress

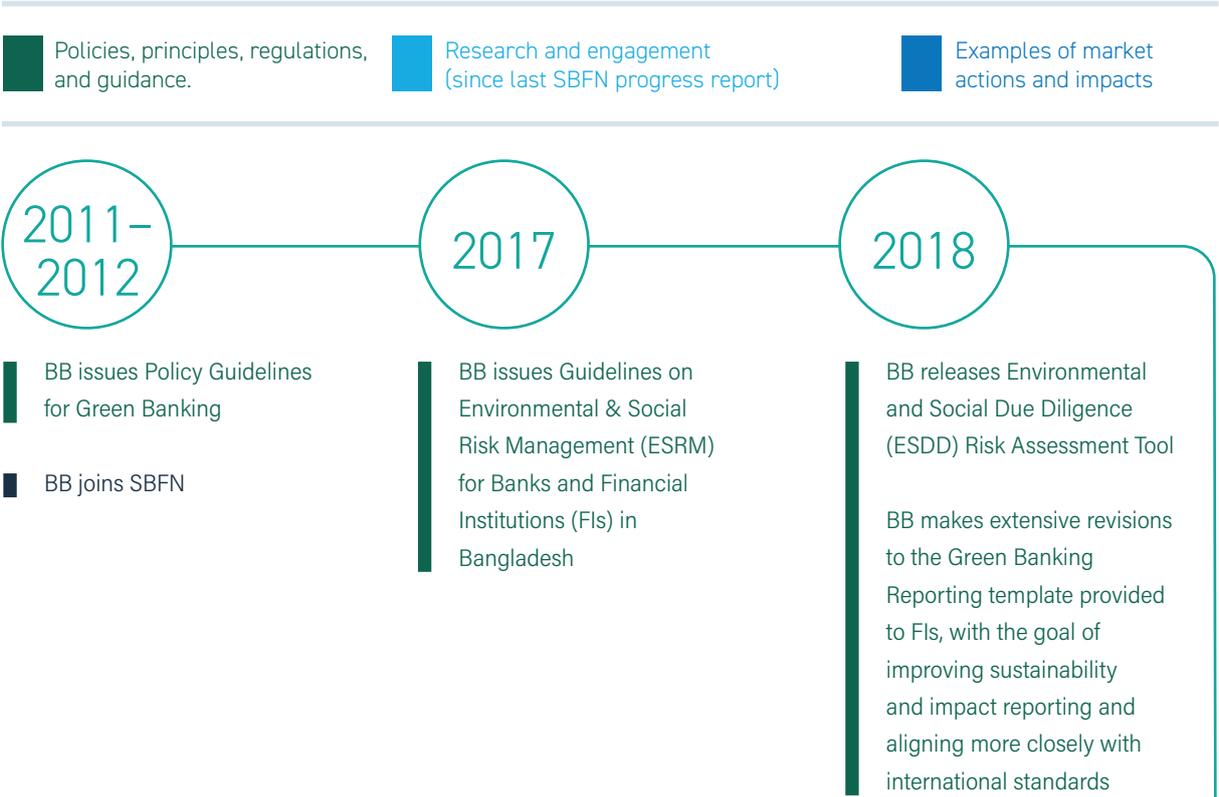
**Bangladesh has continued to make progress in the “Advancing” sub-stage of the “Implementation” stage of the Overall SBFN Progression Matrix.** In 2020 and 2021, Bangladesh Bank (BB) issued the Sustainable Finance Policy for Banks and Financial Institutions, the Sustainability Rating of Banks and Financial Institutions, the Target and Achievement of Sustainable Finance & Green Finance, and updated its template for reporting on Green Banking Activities of Banks and Financial Institutions. Bangladesh’s sustainable finance framework has been implemented for a number of years, and has a series of tools in place, including guidance/guidelines, templates (for example, reporting), training, online tools, and supervision guidance on how to do all the above in practice. Financial institutions (FIs) have also started sustainable finance reporting on implementation in line with consistent reporting instructions/templates.

Figure 1: SBFN Progression Matrix - Overall Country Progress



### 1.4 Country sustainable finance journey

Figure 2: Bangladesh’s sustainable finance journey



2021

BB issues the Target and Achievement of Sustainable Finance & Green Finance and the Updated template for reporting on Green Banking Activities of Banks and FIs

BB publishes a Quarterly Review Report on Green Banking Activities of Banks & Financial Institutions

2020

BB issues the Sustainable Finance Policy for Banks & FIs, including the Sustainable Finance Taxonomy & Green Taxonomy

BB adopts a weighted sustainability rating system which has now been circulated to all 59 major banks as well as other FIs

\$2.9 billion (21 percent) banking assets are covered by environmental, social, and governance (ESG) integration requirements in the national sustainable finance framework

100 percent of banks have established internal ESG structure and/or policies

100 percent of banks report their ESG activities/ performance regularly to the regulator/industry association

100 percent of total assets are overseen by the regulator/ industry association

19 percent of assets to have ESG integration requirements in the national sustainable finance framework applied to them

Total green finance value of \$392 million

2019

BB conducts the Study on Market Landscape on Green Bonds

## 1.5 COVID response

The pandemic has taken a heavy toll on almost all sectors of the economy in Bangladesh. Most significantly, it has caused a reduction of exports by 16.93 percent and imports by 17 percent, as well as a decline in average revenue for all small and medium enterprises by 66 percent in 2020. Bangladesh Bank introduced a moratorium on loan payments until 30 September 2020. In April 2020 the government announced a stimulus package of 677.5 billion Bangladeshi taka (approximately \$8 billion) to be implemented through four programs: increasing public expenditure, formulating a stimulus package, widening social safety net coverage, and increasing monetary supply.

## 1.6 Ambitions for the next phase

Bangladesh Bank is interested in broadening the mandate and remit of its sustainable finance program through the addition of a wider range of policies and guidelines with which SBFN could potentially assist. Although the policies and procedures are in place, environmental and social due diligence has taken a back seat due to the pandemic. Going forward, Bangladesh Bank will focus on monitoring the quality of banks' implementation.

## 1.7 SBFN and IFC role

IFC has provided advisory services to Bangladesh Bank for its sustainable finance initiatives and capacity building, in partnership with the Bangladesh government. Through SBFN, Bangladesh Bank has shared its experience with other SBFN members and benefited from the collective SBFN knowledge base.



Let me extend our heartfelt thanks to the whole SBFN team. We are very pleased to have you as an ally and are grateful that twice you have arranged meetings to support our efforts.



**Mr. Khondkar Morshed Millat**

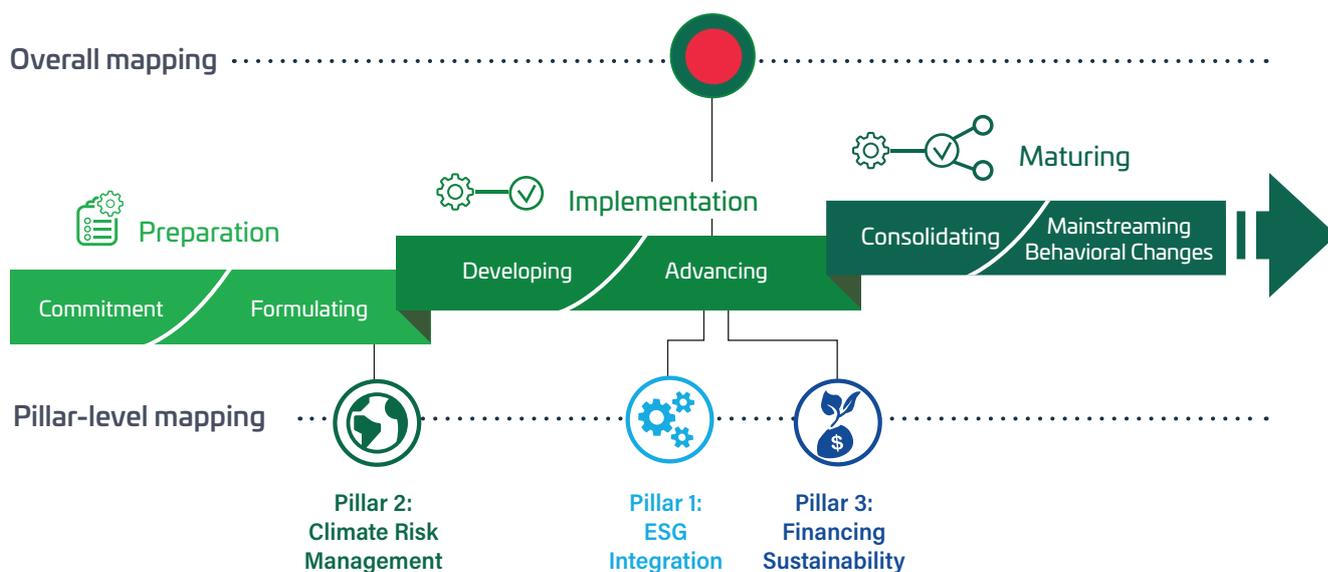
**General Manager**

**Bangladesh Bank**



## 2. Progress by three pillars

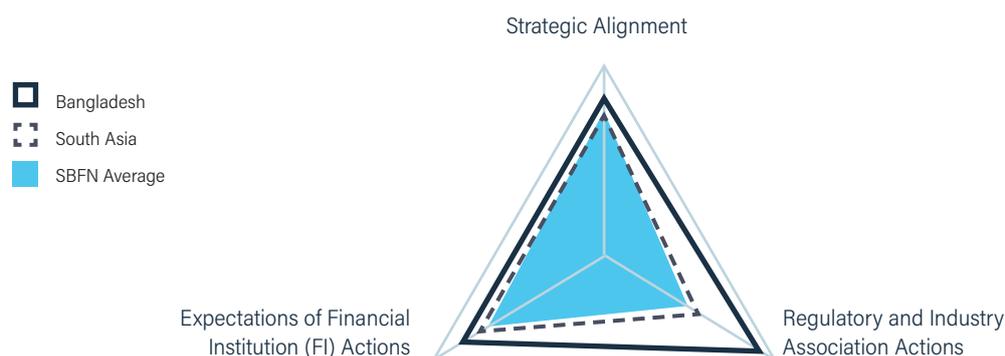
Figure 3: Mapping of overall country progress and individual pillar progress



### Pillar 1: ESG Integration

#### Pillar Progress: Advancing

Bangladesh is mapped under the **“Advancing” sub-stage of the “Implementation” stage** for the ESG Integration Pillar. There is an existing national framework addressing the integration of ESG risk and performance considerations into the practices of FIs. In addition to ongoing activities to raise awareness and build capacity, implementation tools and initiatives are in place, and FIs report on their ESG implementation with consistent reporting instructions or templates.



#### Sub-pillar 1: Strategic Alignment

- Bangladesh's national frameworks for the banking sector, for example the Policy Guidelines for Green Banking (BB, 2011) and Guidelines on ESRM for Banks and FIs (BB, 2017) set out expectations for integrating the consideration of ESG risks and performance.
- Bangladesh's approach to ESG integration in the financial sector is aligned with international good practices and standards, such as the Sustainable Development Goals and IFC Performance Standards & Corporate

Governance Development Framework.

- The framework (Guideline on ESRM for Banks and FIs) was developed and/or implemented in close consultation with stakeholders.

#### **Sub-pillar 2: Regulator and Industry Association Actions**

- Bangladesh's sustainable finance framework is supported by implementation guidance and technical tools. The Guidelines on ESRM for Banks and FIs provides the ESDD checklist, monitoring checklist, and corrective action plan templates.
- In December 2020, Bangladesh Bank issued the Sustainable Finance Policy for Banks and FIs and a reporting template. The policy includes a Sustainable Finance Taxonomy along with a country perspective Green Taxonomy addressing the clarity and guidance needed to identify green and sustainably-linked finance. As of 2021, the top ten banks and top five FIs have been given a sustainability rating by Bangladesh Bank.
- The implementation framework is regularly monitored by Bangladesh Bank and supported by a data collection

approach. ESG data is collected through a quarterly review report on green banking activities of banks and FIs.

- Incentives for FIs to manage ESG performance are provided. Bangladesh Bank recognizes top performing banks and FIs based on their sustainability rating.

#### **Sub-pillar 3: Expectations for FI Actions**

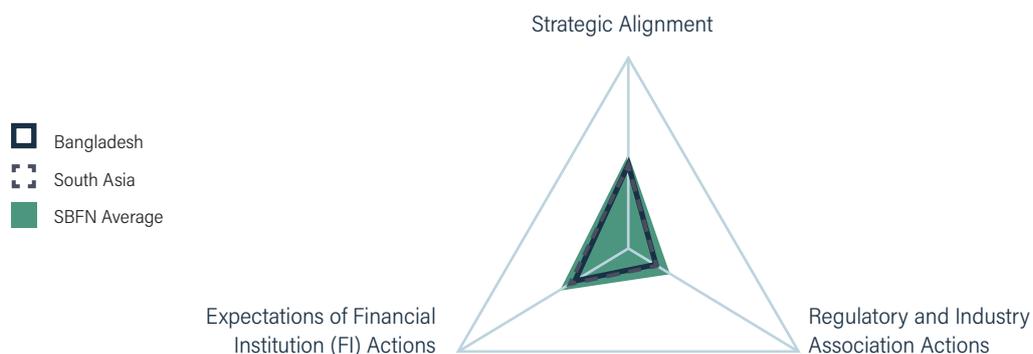
- The Policy Guidelines for Green Banking require FIs to develop policies and procedures to manage ESG risks and performance, undertake regular review and monitoring of ESG risks, and report ESG performance both to the regulator and publicly.
- Bangladesh Bank issued the Sustainability Rating of Banks and FIs in 2020. The Sustainability Rating includes four components: 1) Sustainable finance indicators, 2) CSR activities, 3) Green refinance, 4) Core banking sustainability. Banks are requested to report sustainable finance performance from December 2020.



## Pillar 2: Climate Risk Management

### Pillar Progress: Formulating

Bangladesh is in the **“Formulating” sub-stage of the “Preparation” stage** of the Climate Risk Management Pillar. There is an existing framework for ESG risk management that includes initial requirements to manage climate risks and provides a foundation for the incorporation of more comprehensive approaches to manage both the physical and transition risks of climate change and related financial impacts in line with international practices. Preparations and activities include research, surveys, and/or multi-stakeholder engagement and awareness raising on expectations for climate risk management.



#### Sub-pillar 1: Strategic Alignment

- Addressing climate change risks is a national priority as indicated in Bangladesh's Nationally Determined Contribution (NDC) to the Paris Agreement and national climate policies, including the Bangladesh Climate Change Strategy and Action Plan. In the financial sector, Bangladesh Bank has issued principles and guidelines for the banking sector that incorporate initial elements of managing physical risks of climate change as part of environmental issues in the overall ESG approach for risk management and credit analysis.

#### Sub-pillar 2: Regulatory and Industry Association Actions

- Bangladesh Bank has signaled the importance of managing climate risks given Bangladesh's vulnerability to climate risks and related financial impacts. In partnership with IFC and the World Bank, Bangladesh Bank has issued the Policy Guidelines for Green Banking (2011), the Guidelines on ESRM for Banks and FIs (2017) which reference the IFC Performance Standards, and the Sustainable Finance Policy for Banks and FIs (2020). Collectively, these policies and guidance set initial expectations for FIs to consider climate risk, for example

for physical climate risk as part of E&S risk screening and due diligence tools, and the integration of these risks into overall credit analysis at the transaction and portfolio levels. They also prioritize climate mitigation and adaptation activities to improve resilience.

- The Policy Guidelines for Green Banking's Climate Risk Funds and the Sustainable Finance Policy's Green Taxonomy both acknowledge the importance of managing climate risks and integrate the ESRM approach into screening and monitoring for E&S and climate risk while mobilizing capital for 'climate smart' priority sectors.
- In terms of awareness raising, Bangladesh Bank's Sustainable Finance Department engages in regulator-industry collaboration with the banking sector.
- As part of future progress by Bangladesh, recommended areas of focus for regulatory and industry association actions include research, capacity building, technical guidance (for example climate scenario analysis and stress testing), and development of regulatory and supervisory expectations for FIs for managing physical and transition risks of climate change and related financial impacts.

### Sub-pillar 3: Expectations for FI Actions

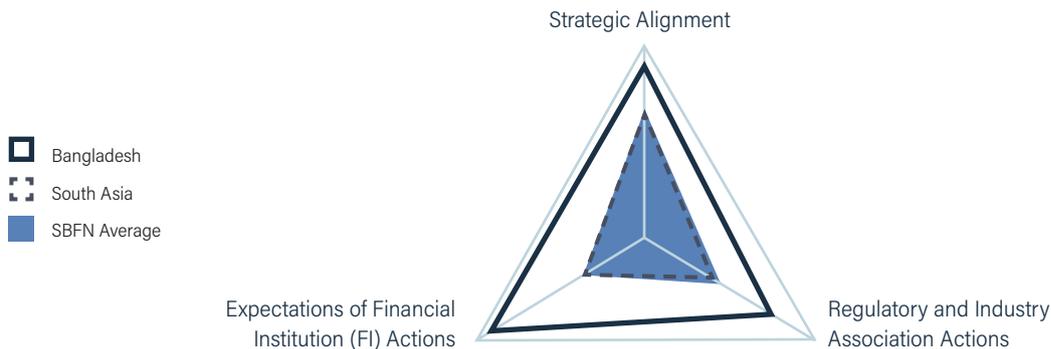
- Application of the Policy Guidelines for Green Banking and Guidelines on ESRM serves to build familiarity and capacity among Bangladeshi FIs to improve climate risk management practices as part of overall ESG risk management approaches. The Guidelines require screening for climate-related physical risks (for example, flood or sea level rise) as part of credit and operational risk management and identifying opportunities for climate resilience. The Sustainable Finance Policy includes a sector screening exclusion list that excludes eligibility of high greenhouse gas intensity sectors in the context of managing a transition to a low-carbon economy.
- As part of future progress by Bangladesh, the ESG-based framework can be further elaborated to guide the expected actions of FIs for the development of their strategy, governance, risk management, metrics/targets and disclosure approaches for climate-related physical and transition risks and financial impacts.



## Pillar 3: Financing Sustainability

### Pillar Progress: Advancing

Bangladesh is mapped under the **“Advancing” sub-stage of the “Implementation” stage** for the Financing Sustainability Pillar. Its national sustainable finance framework for directing financial flows into green, social, climate, and sustainability-linked projects has implementation tools and initiatives in place, and FIs have started reporting financing sustainability performance in line with consistent reporting instructions/templates. In 2021, Bangladesh Bank issued the SFD Circular No. 01: Target and Achievement of Sustainable Finance & Green Finance, which sets a target of 15 percent of all loans issued by the nation’s banks and other FIs meeting the broad definition of being “sustainable”. In 2020, Bangladesh Bank issued the Sustainable Finance Policy for Banks and FIs, including a reporting template, a comprehensive sustainable finance taxonomy, green taxonomy, and a sustainability rating system.



#### Sub-pillar 1: Strategic Alignment

- Bangladesh’s national framework for financing sustainability, led by Bangladesh Bank and its 2020 Sustainable Finance Policy for Banks and FIs, covers both the banking sector and the capital markets.
- The Bangladeshi financial sector’s approach to promoting financial flow into green and sustainability projects and sectors is in alignment with international good practices and standards, such as the UN Sustainable Development Goals, the European Union Taxonomy, and the Climate Bond Initiative’s Climate Bond Taxonomy.
- The Bangladeshi financial sector’s approach on financing sustainability is also aligned with its national goals and strategies, such as the Indicated Nationally Determined Contributions. It also identifies key stakeholders, promotes engagement, and includes a refinance scheme for Islamic Banks and FIs.

#### Sub-pillar 2: Regulatory and Industry Association Actions

- Bangladesh Bank has made it mandatory for 5 percent of all term loans disbursed by the nation’s banks and other FIs to be contributed to green finance and 20 percent of all loans disbursed to be contributed to sustainable finance. Failure regarding these issues will adversely affect both CAMELS rating and sustainability rating, which is unique globally. As of the fall of 2021, the top ten banks and top five FIs, as rated by Bangladesh Bank for sustainability, have been put on the Bangladesh Bank website.
- The Bangladesh Sustainable Finance Policy requires the regulator or industry association to establish mechanisms to identify and encourage the allocation of capital to sustainable sectors, assets, and projects, such as green bond standards.
- The Bangladesh Sustainable Finance Policy provides a green taxonomy, a sustainable finance taxonomy, guidelines for extending green, social or sustainability-focused loans and bonds, and requires external party verification to ensure the credibility of green buildings.

- Bangladesh Bank monitors information reported by FIs related to green, social, and sustainability-focused investment, lending, and other instruments to prevent greenwashing and social-washing. It also provides financial and non-financial incentives for FIs to develop and grow green, social, or sustainability finance instruments.

### **Sub-pillar 3: Expectations for FI Actions**

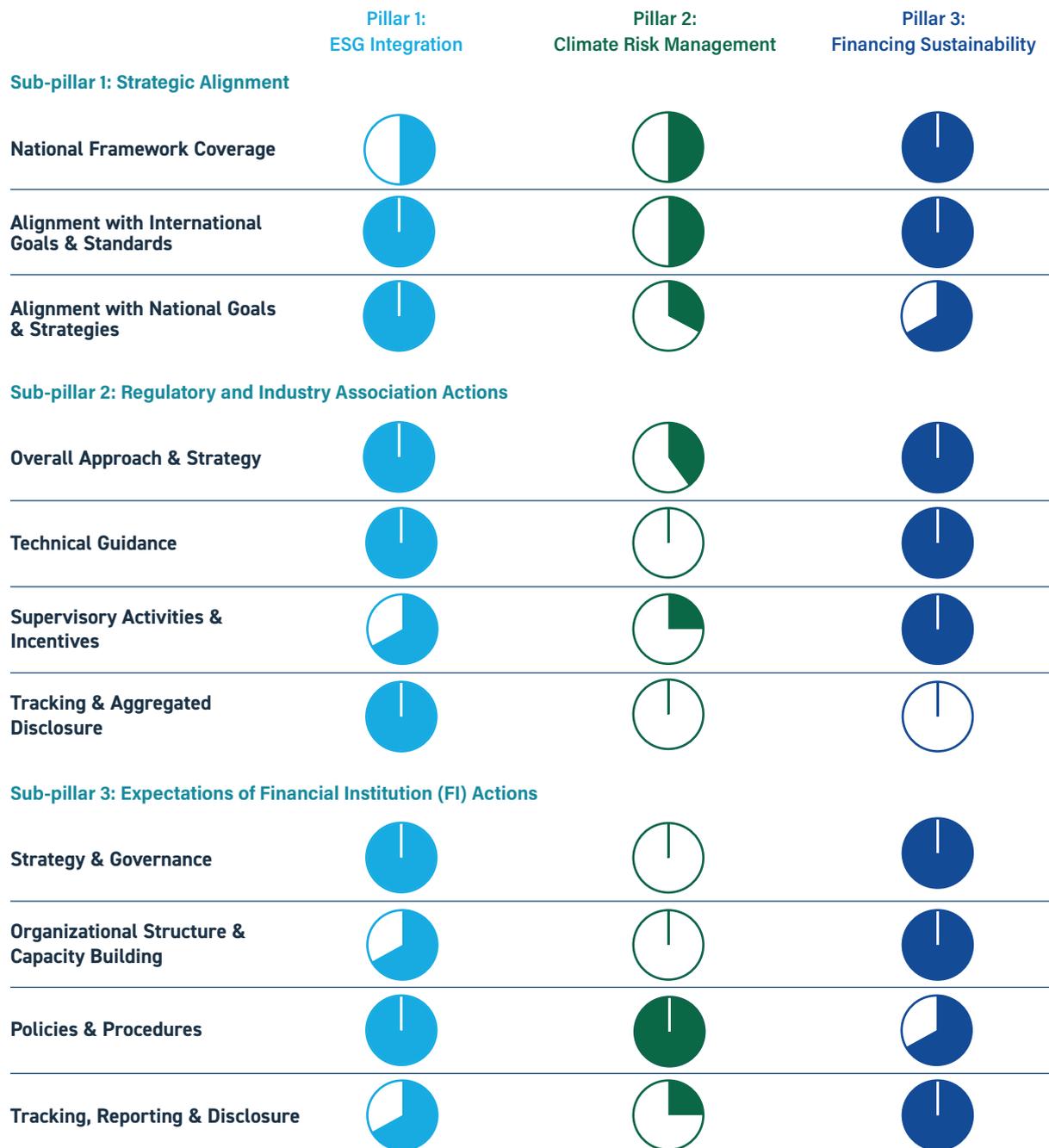
- Bangladesh's sustainable finance framework requires FIs to establish a strategy, governance, or high-level targets, including at the level of the board of directors, for capital allocation to sustainable assets, projects, or sectors.
- The Sustainable Finance Policy requires FIs to define internal staff roles and responsibilities to encourage finance flows to green, social, and/or sustainability-focused investments, and to develop and maintain related internal staff capacity. FIs also need to create incentives for managers to increase sustainable loans or investments in their portfolio.
- Banks and FIs will develop their own Sustainable

Finance Policy, which must be approved by a competent authority. The board's approval will be required for the risk management committee's approach in the case of all scheduled commercial banks.

- The Sustainable Finance Policy is accompanied with a reporting template that all banks and FIs are required to complete and submit to Bangladesh Bank regularly. Banks and FIs are asked to start publishing independent sustainability reports. Banks are also encouraged to publish their sustainable financing activities and impacts publicly.

# 3. Progress by three sub-pillars and 11 indicators

Figure 4: Overview of Bangladesh’s sustainable finance coverage in three framework areas



## 4. Library of national sustainable finance framework documents

National strategies, roadmaps, policies, voluntary principles, regulations, guidelines, research, templates, and tools that provide an enabling framework for sustainable finance

SFD Circular No. 01: Target and Achievement of Sustainable Finance & Green Finance (BB, 2021)

Updated template for report on Green Banking Activities of Banks and Financial Institutions (BB, 2021)

Sustainable Finance Policy for Banks and Financial Institutions (BB, 2020)

Sustainability Rating of Banks and Financial Institutions (BB, 2020)

Green Bonds Development in Bangladesh: A market landscape (BB, 2019)\*

Environmental and Social Due Diligence (ESDD) Risk Assessment Tool (BB, 2018)

Green Banking Reporting template (BB, 2018)

Guidelines on Environmental and Social Risk Management (ESRM) for Banks and Financial Institutions in Bangladesh (BB, 2017)

Policy Guidelines for Green Banking (BB, 2011)

Download framework documents and check for updates at [www.sbfnetwork.org/library](http://www.sbfnetwork.org/library)

\* Not a policy document, but a key research, data disclosure, and stakeholder engagement material/publication.

# 5. SBFN measurement framework and methodology

## About SBFN

Established in 2012, the Sustainable Banking and Finance Network (SBFN) is a unique, voluntary community of financial sector regulatory agencies and industry associations from emerging markets committed to advancing sustainable finance in line with international best practice. SBFN is facilitated by IFC as secretariat, and supported by the World Bank Group.

As of October 2021, SBFN comprised 43 member countries representing over US\$43 trillion and 86 percent of total banking assets in emerging markets. Members are committed to collectively driving measurable change.

## Why a measurement framework?

In 2016, members requested a systematic comparison of country approaches to developing national sustainable finance frameworks. The SBFN Measurement Working Group was established to convene member inputs on the design of a common framework to benchmark country progress and accelerate peer-to-peer knowledge exchange. The Framework is designed to inform the biennial SBFN Global Progress Report.

## An evolving framework

The SBFN Measurement Framework reflects the activities, strategies, and tools that members use to promote sustainable finance in their countries. It evolves to match advances in country initiatives. It also incorporates the latest international standards and best practices identified by members as important to their efforts.

## A member-led approach

The Framework was designed with extensive member input under the leadership of the Measurement Working Group and Co-Chairs. Updates to the Framework are guided by the Measurement Working Group and agreed by all SBFN Members.

## Data collection in partnership with members

As of 2021, data collection for the SBFN Global Progress Report relies on member country reporting in line with the updated Measurement Framework. Information is supported by evidence, which is verified by the SBFN secretariat in collaboration with third-party service providers. Evaluation and milestones are objective and transparent. Members approve the final Global and Country Progress Reports.

The Framework can be used as:



a **mapping tool** to capture the dynamic interaction of collective insights, market-based actions, and policy leadership demonstrated by SBFN members as they move their financial markets toward sustainability;



a **benchmarking tool** for SBFN members to learn from and compare peer approaches, track and review progress against global benchmarks, develop common concepts and definitions, and leverage innovations and strengths; and



a **forward planning and capacity building tool** to identify future policy pathways and capacity building needs.

The Measurement Framework is based on three intersecting themes in sustainable finance. For each theme, it assesses regulatory guidance, supervision strategies, disclosure requirements, and voluntary industry approaches.



**ESG Integration** refers to the management of environmental, social, and governance (ESG) risks in the governance, operations, lending, and investment activities of financial institutions.



**Climate Risk Management** refers to new governance, risk management, and disclosure practices that financial institutions can use to mitigate and adapt to climate change.



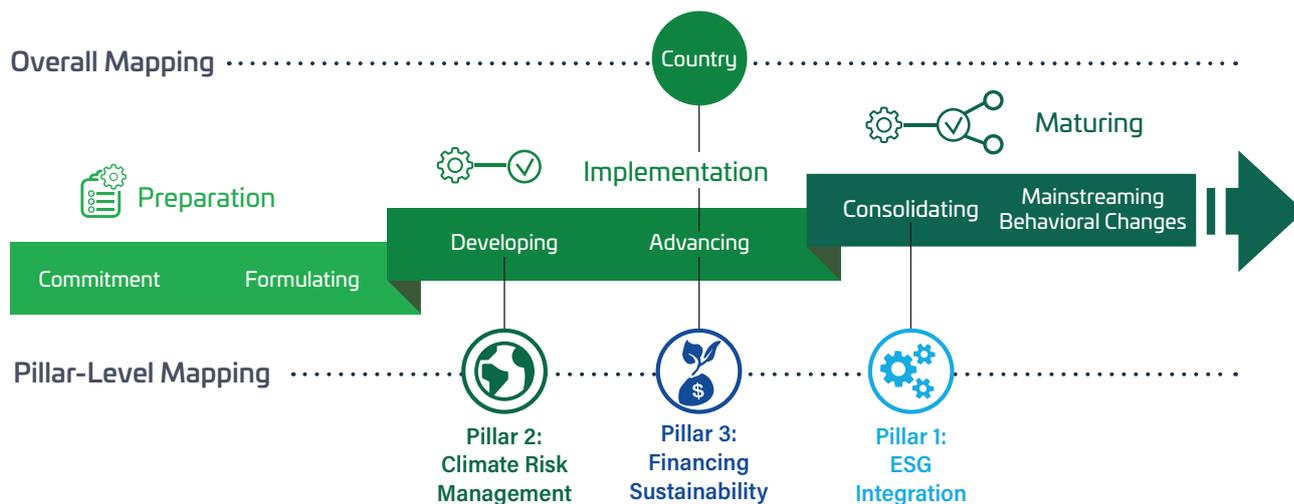
**Financing Sustainability** refers to initiatives by regulators and financial institutions to unlock capital flows for activities that support climate, green economy, and social goals. This includes new products like green bonds and sustainability-linked loans. Initiatives include definitions, guidance, taxonomies, monitoring, and incentives.

# The Measurement Framework consists of three complementary components:

## 1. Progression matrices

Drawing on SBFN members' common development paths and milestones, the **SBFN Progression Matrix** provides an overview of market-wide progress for all SBFN countries across three typical stages of development. It allows each SBFN member to review its own progress and identify the strengths and weaknesses of its approach.

The stage mapping is based on qualitative milestones and quantitative analysis related to (i) progress in developing and implementing national policies and principles, and (ii) industry uptake and practices. In the 2021 report, in addition to the Overall Progression Matrix, three pillar-level matrices are added to reflect a country's development process in each of the pillar areas.



## 2. Pillar benchmarking

A dynamic assessment is conducted across several priority pillars of sustainable finance, using qualitative and quantitative datapoints to assess progress and allow comparison across countries. Three pillars, three cross-cutting sub-pillars, 11 cross-cutting indicators, and 75 underlying datapoints are used to objectively assess a country's sustainable finance framework(s), according to clarity, depth, and alignment to international good practice.

	Pillar 1: ESG Integration	Pillar 2: Climate Risk Management	Pillar 3: Financing Sustainability
Sub-pillar 1: Strategic Alignment	<ul style="list-style-type: none"> <li>National framework</li> <li>Alignment with international goals and standards</li> <li>Alignment with national goals and strategies</li> </ul>		
Sub-pillar 2: Regulatory and Industry Association Actions	<ul style="list-style-type: none"> <li>Overall approach and strategy</li> <li>Technical guidance</li> <li>Supervisory activities and incentives</li> <li>Tracking and aggregated disclosure</li> </ul>		
Sub-pillar 3: Expectations of Financial Institution (FI) Actions	<ul style="list-style-type: none"> <li>Strategy and governance</li> <li>Organizational structure and capacity</li> <li>Policies and procedures</li> <li>Tracking, reporting, and disclosure</li> </ul>		

## 3. Sector data and case studies

In 2021, data collection included an exploratory request for quantitative data points — where available — for the number and percentage of financial institutions that are implementing ESG integration as well as climate risk management and disclosure; and the total value of green, social, and sustainability bond issuance. Detailed case studies were also collected of innovative approaches by regulators and industry. Case studies will be published in a new on-line case study catalogue.



SBFN on-line case study catalogue  
Coming soon

# SBFN Measurement Framework pillars, sub-pillars, indicators, and underlying datapoints

Pillar 1: ESG Integration			
Sub-pillar	Indicator	No.	Underlying datapoint
Strategic Alignment	National framework <sup>1</sup> (e.g. policies, roadmaps, guidance, regulations, voluntary principles, templates, or tools)	1	Has the regulator or industry association published a national framework ("Framework") for the banking sector that sets out expectations for integrating the consideration of environmental, social, and governance (ESG) risks and performance?
		2	Has the relevant regulator or industry association published a Framework for capital markets, investment, insurance or other non-lending FIs that sets out expectations for integrating the consideration of ESG risks and performance?
	Alignment with international goals and standards	3	Does the Framework make reference to international sustainable development frameworks or goals?
		4	Does the Framework make reference to established international ESG risk management standards and principles for FIs?
	Alignment with national goals and strategies	5	Does the Framework make reference to specific national development objectives, plans, policies, goals, or targets?
		6	Does any cooperation exist between agencies or between the regulator and industry association with respect to policy design and/or implementation related to ESG integration?
		7	Does any inter-agency data sharing currently exist related to ESG integration by FIs?
Regulatory and Industry Association Actions	Overall approach and strategy	8	Does the Framework provide guidance on the role of the regulator or industry association with regard to assessing and managing ESG risk and performance in the financial sector?
		9	Has the regulator or industry association undertaken market assessment to identify systemic ESG risks through analysis of the portfolios of supervised entities/members and published the results?
	Technical guidance	10	Does the Framework provide technical guidance or tools to support implementation of ESG risk and performance management by the financial sector?
	Supervision activities and incentives	11	Is the implementation of the Framework regularly monitored and/or information regularly collected from FIs by the regulator and/or industry association?
		12	Does the regulator or industry association provide any financial or non-financial incentives for FIs to manage ESG performance as part of the Framework?
		13	Does the regulator or industry association apply any disincentives/penalties for non-compliance by FIs in terms of expectations from the regulator and/or industry association related to ESG risk management as part of the Framework?
	Tracking and aggregated disclosure	14	Has the regulator or industry association established a data collection approach and database to track or regularly publish data related to ESG integration by FIs as part of the Framework?
Expectations of FI Actions	Strategy and governance	15	Does the Framework require/ask the FI's board of directors (or highest governing body) to approve an ESRM and/or ESG integration strategy, and to supervise its implementation?
	Organizational structure and capacity	16	Does the Framework require/ask FIs to allocate resources/budget commensurate with portfolio ESG risks and define roles and responsibilities for ESG integration within the organization?
		17	Does the Framework require/ask FIs to develop and maintain the ESG expertise and capacity of staff commensurate with portfolio ESG risks through regular training and learning?
		18	Does the Framework require/ask FIs to create incentives for managers to reduce the ESG risk-level of the portfolio over a specified timeframe?
	Policies and procedures	19	Does the Framework require/ask FIs to develop policies and procedures to identify, classify, measure, monitor, and manage ESG risks and performance throughout the financing cycle at the client level and/or the transaction/project level?
		20	Does the Framework require/ask FIs to undertake a regular review and monitoring of ESG risk exposure at aggregate portfolio level?
		21	Does the Framework require/ask FIs to establish and maintain an external inquiry/complaints/grievance mechanism for interested and affected stakeholders in relation to ESG practices?
	Tracking, reporting, and disclosure	22	Does the Framework require/ask FIs to report ESG risks and performance to the regulator or industry association?
		23	Does the Framework require/ask FIs to report on ESG integration publicly?
		24	Does the Framework require/ask FIs to track credit risk (e.g. loan defaults) and/or financial returns in relation to ESG risk level?
Pillar 2: Climate Risk Management			
Strategic Alignment	National framework	25	Has the regulator or industry association published a national framework ("Framework") for the banking sector that sets out expectations for integrating the consideration and management of climate risks and their impact in the national economy?
		26	Has the relevant regulator or industry association published a Framework for capital markets, investment, insurance, or other non-lending FIs that sets out expectations for integrating the consideration and management of climate risks and their impact in the national economy?
	Alignment with international goals and standards	27	Does the Framework make reference to international agreements or frameworks to address climate?
		28	Does the Framework recognize or align with established regional or international good practice for climate risk management and disclosure by FIs?
	Alignment with national goals and strategies	29	Has the regulator or industry association aligned the Framework with national goals to address climate change in line with the country's Nationally Determined Contributions (NDCs) to the Paris Agreement?
		30	Does any cooperation exist between agencies, or between government and industry association, with respect to policy design or implementation related to climate risk management?
		31	Does any inter-agency data sharing currently exist related to climate risk management by FIs?

<sup>1</sup> **National framework** refers to the collective set of policies, roadmaps, guidance, regulations, and/or voluntary principles issued by national regulators or industry associations in relation to each pillar of sustainable finance. SBFN recognizes that national frameworks for sustainable finance vary from country to country and are influenced by national priorities and characteristics. They are also often interdependent with other national roadmaps, policies, and regulations. Countries vary in their starting points and the types of documents to kickstart the enabling framework. For instance, initial frameworks could choose to focus on ESG risk management and/or sustainable finance opportunities such as green bonds. They could also focus on banking, capital markets, or institutional investors. The variety of SBFN frameworks provides a rich source of inspiration for peer learning and collaboration.

Regulatory and Industry Association Actions	Overall approach and strategy	32	Has the regulator or industry association undertaken research on historical impacts to the economy and financial sector from climate change, and/or future expected impacts resulting from physical and transition climate risks?
		33	Does the Framework identify key sources of GHG emissions – such as in particular sectors – as priorities in the proactive management of climate risks by the financial sector?
		34	Does the Framework incorporate the conservation/restoration of natural carbon sinks (such as oceans, forests, mangroves, grasslands, and soils) as an important part of reducing climate change risks (e.g., through guidelines, scenario analysis, targets, or incentives for FIs)?
		35	Has the regulator or industry association developed an internal strategy to address climate risk, and/or embedded climate risk management into its governance, organizational structures, and budget as part of the Framework?
		36	Has the regulator or industry association undertaken any activities to expand and deepen analytical understanding of national and/or cross-border physical and transition climate risks, and to raise awareness as to how these risks may transmit to, and impact, the financial sector?
Regulatory and Industry Association Actions	Technical guidance	37	Has the regulator or industry association developed risk assessment approaches, methodologies, or tools to understand and assess the financial sector's exposure to climate risk as part of the Framework?
	Supervisory activities and incentives	38	As part of the Framework, has the regulator clarified supervisory expectations with regard to climate risk management by FIs, including consideration of international good practices?
		39	Has the regulator started to explicitly embed climate-related risk in supervisory activities and review processes as part of the Framework?
		40	Is the implementation of the Framework regularly monitored and/or information regularly collected from FIs by the regulator and/or industry association?
	41	Are there any financial or non-financial incentives to encourage FIs to establish climate risk management systems?	
Tracking and aggregated disclosure	42	Does the regulator or industry association regularly collect and/or report market-level and/or FI-level data on climate-related financial sector risks as part of the Framework?	
Expectations of FI Actions	Strategy and governance	43	Does the Framework require/ask FIs to establish a strategy for climate risk management with responsibility at the board of director level (or highest governing body)?
	Organizational structure and capacity	44	Does the Framework require/ask FIs to define the roles and responsibilities and related capacities of the FI's senior management and operational staff in identifying, assessing, and managing climate-related financial risks and opportunities?
	Policies and procedures	45	Does the Framework require/ask FIs to expand existing risk management processes to identify, measure, monitor, and manage/mitigate financial risks from climate change?
	Tracking, reporting, and disclosure	46	Does the Framework require/ask FIs to report on their overall approaches to climate risk management in line with international good practices (e.g. TCFD), or establish a timeline by which FIs should begin to align their reporting with such practices?
		47	Does the Framework require/ask FIs to identify, measure, and report on exposure to sectors which are vulnerable to transition risk and physical risk?
		48	Does the Framework require/ask FIs to adopt and report on performance targets to reduce portfolio greenhouse gas (GHG) emissions on a regular basis?
		49	Does the Framework require/ask FIs to adopt and report on performance targets to reduce exposure to climate change risks at the portfolio level on a regular basis?

### Pillar 3: Financing Sustainability

Strategic Alignment	National framework	50	Has the regulator or industry association published a national framework ("Framework") for the banking sector that sets out expectations for integrating the consideration of instruments, goals, and standards for financing sustainability, including requirements for ensuring credibility and managing and measuring resulting impacts in the national economy?
		51	Has the relevant regulator or industry association published a Framework for capital markets, investment, insurance, or other non-lending FIs that sets out expectations for integrating the consideration of instruments, goals, and standards for financing sustainability, including requirements for ensuring credibility and managing and measuring resulting impacts in the national economy?
	Alignment with international goals and standards	52	Has the regulator or industry association developed a strategy, regulations, or set of frameworks for stimulating the allocation of capital to sustainable assets, projects, and related sectors in line with global goals, such as the Sustainable Development Goals (SDGs)?
		53	Does the Framework recognize and/or align with existing standards, voluntary principles, or market good practices related to sustainable finance instruments?
	Alignment with national goals and strategies	54	Does the Framework enable the achievement of stated national objectives by guiding capital to sectors, assets, and projects that have environmental and social benefits in line with national sustainable development priorities, strategies, targets, and the size of sustainable investment needs, and taking into account the local barriers to scaling-up sustainable finance?
		55	Does any cooperation exist between agencies or between the regulator and industry association with respect to policy design or implementation related to sustainable finance flows?
56		Does any inter-agency data sharing currently exist related to stimulating and monitoring sustainable finance flows?	
Regulatory and Industry Association Actions	Overall approach and strategy	57	Does the Framework require/ask the regulator or industry association to establish mechanisms to identify and encourage the allocation of capital to sustainable sectors, assets, and projects?
	Technical guidance	58	Does the Framework provide definitions, examples, and/or a taxonomy (catalogue and guidelines) of sustainable finance assets?
		59	Does the Framework provide guidelines for extending green, social, or sustainability-focused loans (excluding bonds)?
		60	Does the Framework provide guidelines for issuance of green, social, or sustainability bonds?
		61	Does the Framework require/ask for external party verification to ensure the credibility of sustainability instruments?
	Supervisory activities and incentives	62	Does the regulator or industry association monitor information reported by FIs related to green/social/sustainability investment, lending, and other instruments to prevent greenwashing and social-washing?
		63	Are there any financial or non-financial incentives for FIs to develop and grow green, social, or sustainability finance instruments?
	Tracking and aggregated disclosure	64	Does the regulator or industry association collect and/or publish data from FIs or other sources about allocation of capital to green/social/sustainability assets, projects, or sectors?

Expectations of FI Actions	Strategy and governance	65	Does the Framework require/ask FIs to establish a strategy, governance, or high-level targets, including at the Board of Directors level, for capital allocation to sustainable assets, projects, or sectors?
	Organizational structure and capacity building	66	Does the Framework require/ask FIs to define internal staff roles and responsibilities to encourage finance flows to green, social, and/or sustainability-focused investments?
		67	Does the Framework require/ask FIs to develop and maintain internal staff capacity on green, social, or sustainability products through regular training and learning?
	Policies and procedures	68	Does the Framework require/ask FIs to put in place policies and procedures for defining, issuing, managing proceeds, tracking performance, and reporting on green, social or sustainability-focused products?
		69	Does the Framework require/ask FIs to appoint an independent external reviewer to confirm that the FI's internal framework meets the requirements of the recognized national framework and regulations, or aligns to international standards?
		70	Does the Framework require/ask that FIs create incentives for managers to increase sustainable loans or investments in the portfolio?
	Tracking, reporting, and disclosure	71	Does the Framework require/ask FIs to publish annual updates on the performance and impacts of the sustainability instruments in compliance with relevant national and/or international standards?
		72	Does the Framework require/ask FIs to obtain and disclose independent review of metrics reported annually in relation to the social and environmental outcomes and impacts achieved through the sustainability instruments?
		73	Does the Framework require/ask FIs to report to the regulator(s) or industry association(s) on allocation and/or outcomes of green, social, and/or sustainability loans?
		74	Does the Framework require/ask FIs to report to the regulator(s) or industry association(s) on green, social, and/or sustainability bonds or other positive impact investments?
		75	Does the Framework require/ask FIs to report publicly on their green, social, and sustainability-focused finance activities and positive outcomes or impacts (i.e. not only to the regulator or shareholders)?

Figure 5: Overall Progression Matrix Milestones

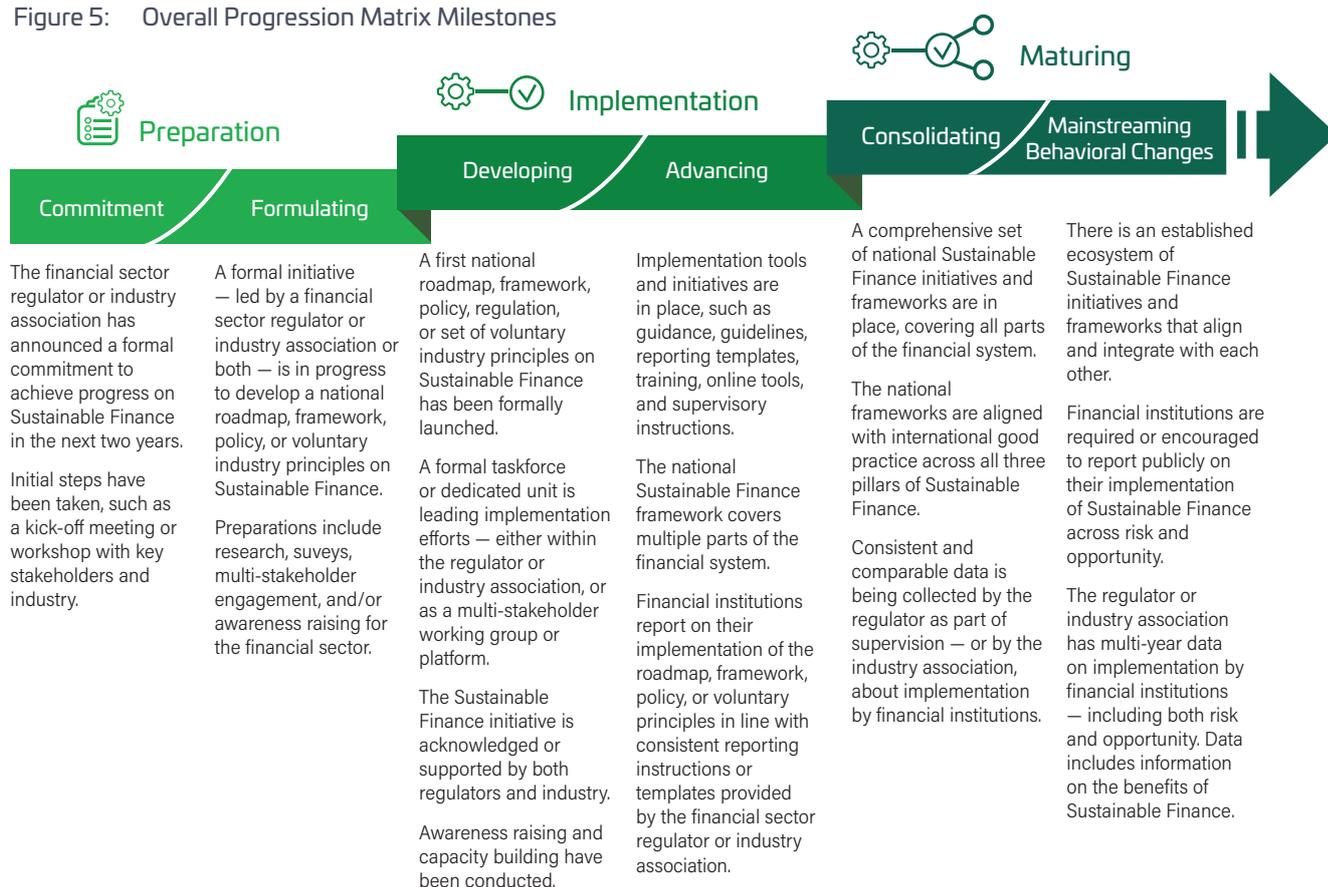


Figure 6: Progression Matrix Milestones – Pillar 1: ESG Integration

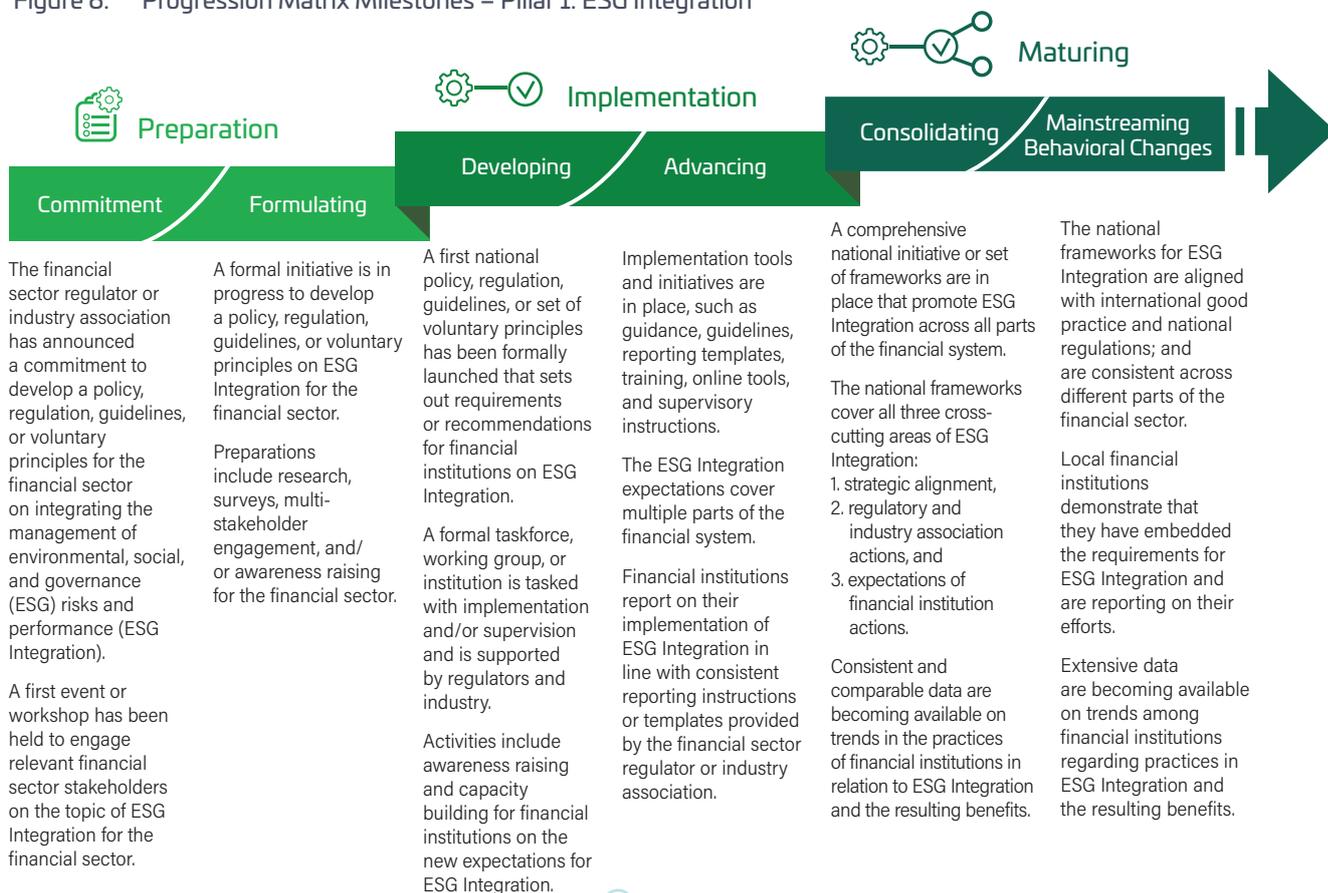


Figure 7: Progression Matrix Milestones – Pillar 2: Climate Risk Management

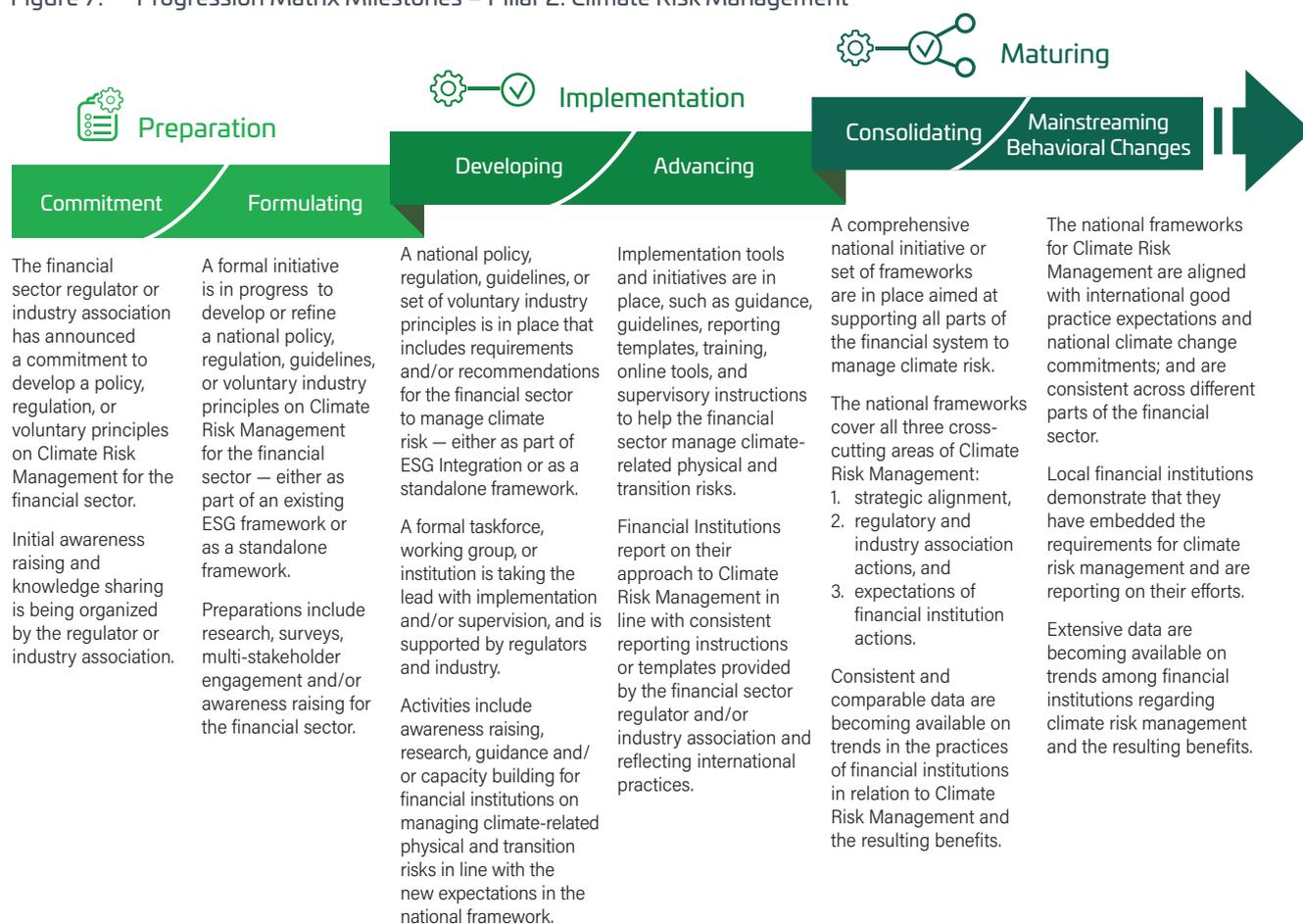
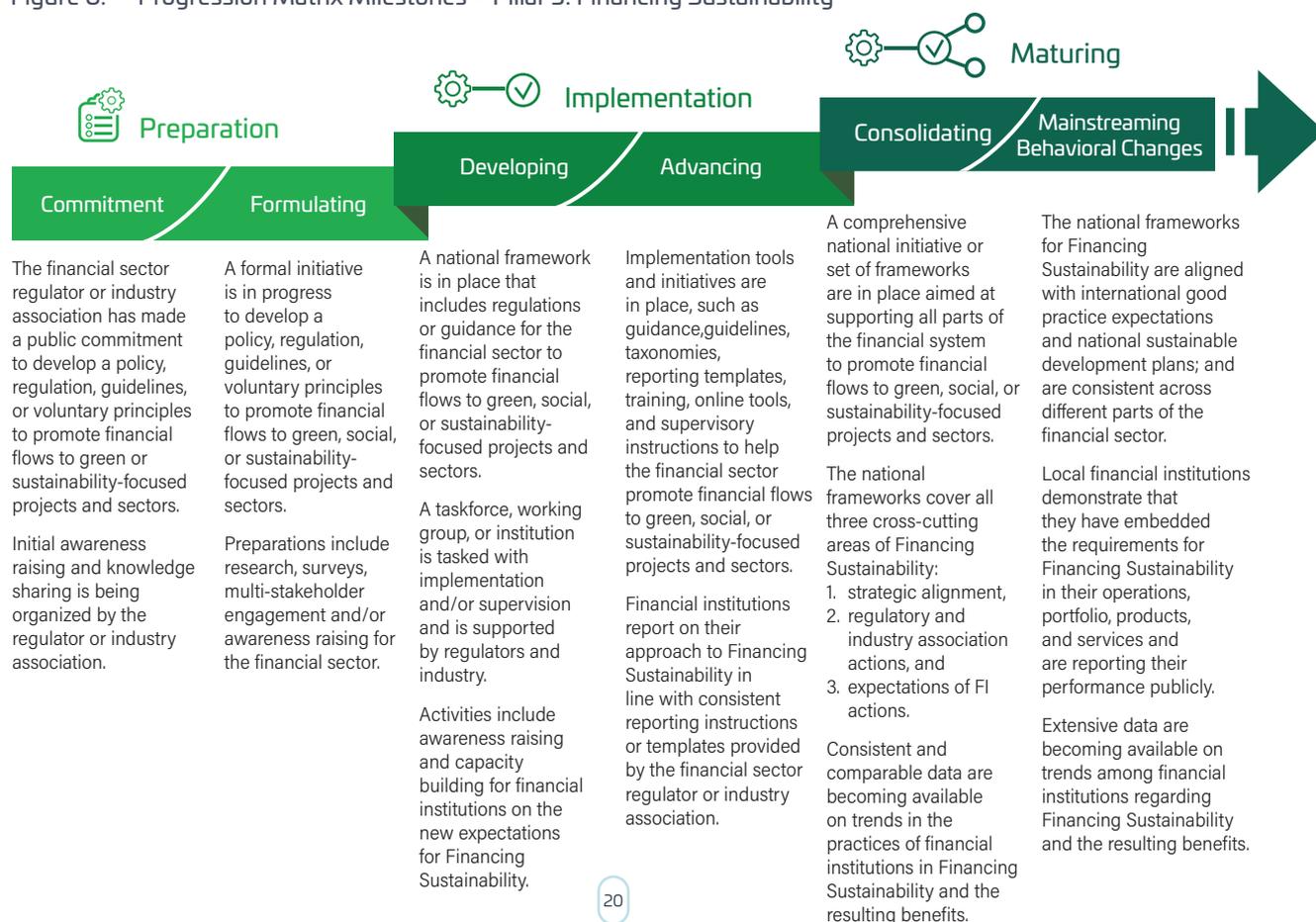


Figure 8: Progression Matrix Milestones – Pillar 3: Financing Sustainability



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