

# Dominican Republic Country Progress Report

April 2022

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



Sustainable  
Banking and  
Finance  
Network



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## Acknowledgements

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## 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 – Dominican Republic

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 5

## 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 8

## 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 9

## 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 10

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 – Dominican Republic

## 1.1 SBFN member institution:

[Multiple Banks Association of the Dominican Republic \(ABA\)](#)

Member Since: 2017

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

[Superintendency of the Securities Market \(SIMV\)](#)

[Dominican Republic Stock Exchange \(BVRD\)](#)

[Central Bank of the Dominican Republic](#)

[Superintendency of Banks of the Dominican Republic \(SB\)](#)

[Association of Banks and Credit Corporations of the](#)

[Dominican Republic](#)

## 1.3 Overall progress

The Dominican Republic has **moved up to the “Developing” sub-stage of the “Implementation” stage** from the “Commitment” sub-stage of the “Preparation” stage. In 2020, the Superintendency of the Securities Market published the Guidelines for the Issuance of Sustainable, Green, and Social Securities on the Dominican Republic Stock Exchange, setting up the country's green bond market and its national sustainable finance framework. Multiple Banks Association of the Dominican Republic (ABA) has formed a formal taskforce for national sustainable finance, which is acknowledged or supported by both regulators and industry, and which has conducted awareness raising and capacity building, as well as sustainable finance policy development.

Figure 1: SBFN Progression Matrix - Overall Country Progress



## 1.4 Country sustainable finance journey

Figure 2: Dominican Republic's sustainable finance journey



## 1.5 COVID response

The pandemic caused a sharp contraction across critical sectors such as tourism, construction, and mining, necessitating direct and indirect tax measures, including an extension of the deadline for filing and paying tax obligations. A tax amnesty and other relief for taxpayers has also been introduced. Employment-related measures partly cover employee salaries for companies in difficulty. A new social aid plan has also been introduced, and additional economic stimulus measures support debtors, reduce interest rates, and inject liquidity into the financial system. The prohibition of energy and public telecommunication suspensions and late charges were imposed, and certain other regulations have been made temporarily more flexible.

## 1.6 Ambitions for the next phase

Broadly speaking, the goal is to elevate green finance, and to create commitment at the highest levels of institutions, such as executive boards. This requires green finance to be institutionalized within banking practices. The other component that will receive attention is risk management. There is a plan to consolidate the taxonomy effort currently led by the capital markets sector. ABA is currently working only within the banking sector, which accounts for 90 percent of total assets in the financial sector. The ABA is close to holding its first meeting with the central bank to formalize the initiative on the green protocol, with IFC support. The ABA has designed a working roadmap, and after a survey to gauge awareness among the banks has been completed, the ABA will start working on a green protocol draft.

## 1.7 SBFN and IFC role

IFC has provided support to the financial sector for sustainable finance initiatives and capacity building in the Dominican Republic, in partnership with the Government of Canada. Through SBFN, ABA has shared its experience with other SBFN members and benefited from the collective SBFN knowledge base.



I can see that the SBFN has an impressive reach. After countries start working with the SBFN, things start happening, as we saw with the green bond issuances and the frameworks. We feel very comfortable with our alliance, and we know that we are going to reach great results after a few months or years. We're very happy and committed as a banking sector to start moving in this direction.

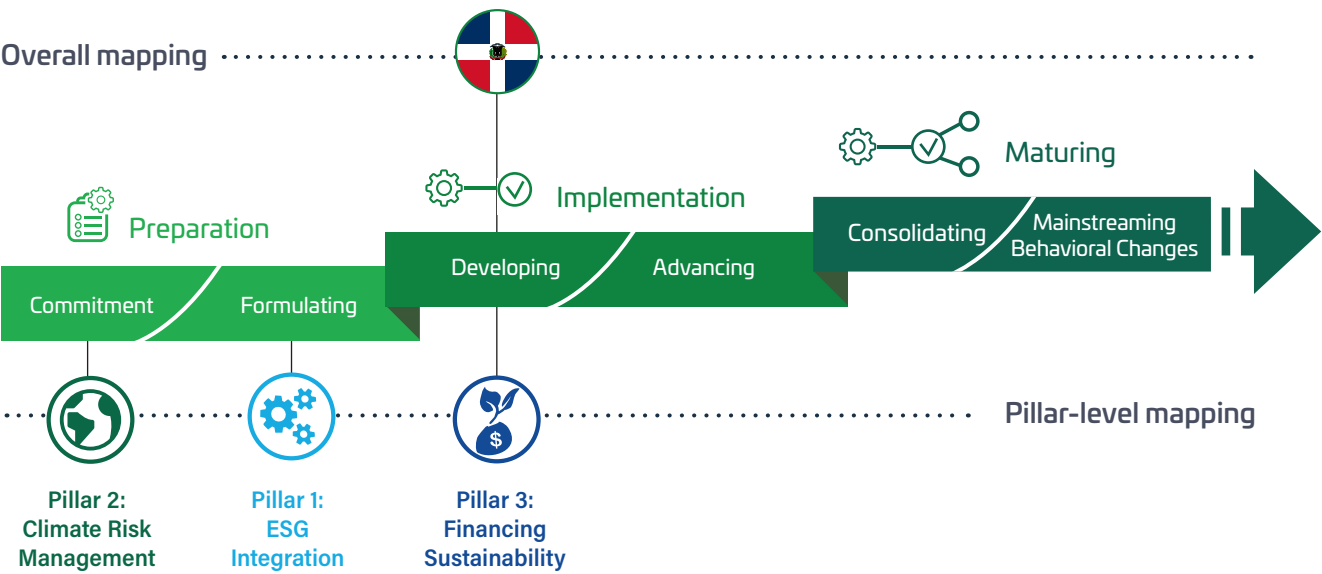


**Mr. Julio Lozano**  
**Director of Economic Studies**  
**Multiple Banks Association of the Dominican Republic (ABA)**



# 2. Progress by three pillars

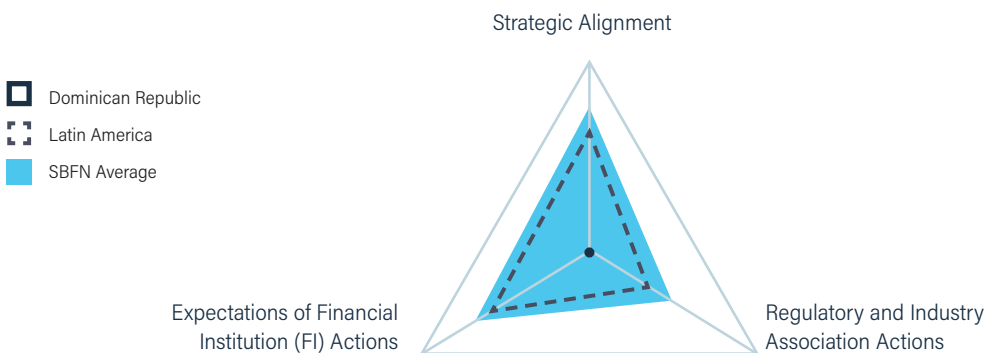
Figure 3: Mapping of overall country progress and individual pillar progress



## Pillar 1: ESG Integration

**Pillar Progress: Formulating**

The Dominican Republic is mapped under the **“Formulating” sub-stage of the “Preparation” stage** for the ESG Integration Pillar. A formal initiative to develop a formal policy/principle is in progress and there has been multi-stakeholder engagement and awareness raising.



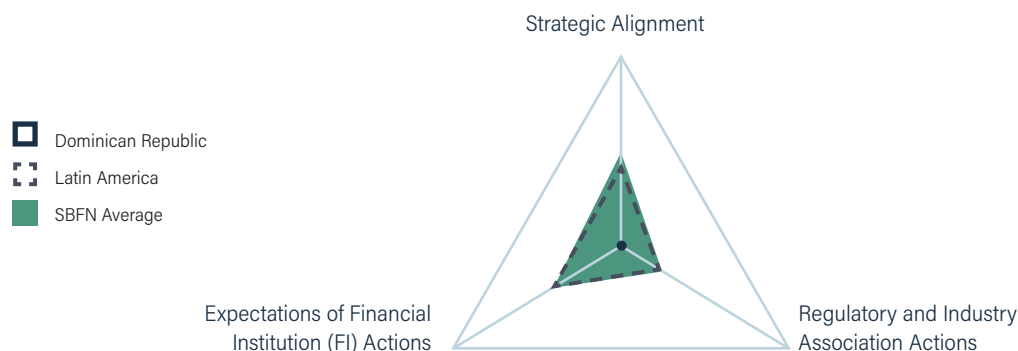
- ABA is currently in the early stages of formalizing its integration of environmental, social, and governance (ESG) into the banking system. A formal meeting between the banking committee and ABA has been held to align priorities for the green protocol. The ABA is in the process of arranging this collaboration and is close to holding the first meeting with the central bank to formalize the initiative on the green protocol.
- A training program with the Green Banking Academy has been instituted. The ABA also has its own internal training programs and will incorporate the Green Banking Academy courses into those internal programs. This is intended to increase knowledge of the subject among both partners and the general public.



## Pillar 2: Climate Risk Management

### Pillar Progress: Commitment

The Dominican Republic is mapped under the **"Commitment" sub-stage of "Preparation" stage** for the Climate Risk Management Pillar. As part of SBFN membership and the SBFN Measurement Framework coverage of climate risk management, the Dominican Republic has signaled an intention to develop an approach to manage climate risks in the financial sector, and initial awareness-raising activities on climate risk management have been undertaken.



- There is currently a relatively low level of awareness and knowledge around climate risks in the banking sector, however, the Dominican Stock Exchange (BVRD) is a formal supporter of the Taskforce on Climate-related Financial Disclosures (TCFD).
- As part of awareness-raising on climate risk management, in 2020, one bank in the Dominican Republic participated in a regional survey on the approaches of financial institutions to incorporating climate change into risk management undertaken by the United Nations Environment Programme Finance Initiative and the Development Bank of Latin America (CAF), with coordination by the Federation of Latin American Banks (FELABAN), a member of SBFN.
- On the coverage of strategy and governance, the Government of the Dominican Republic has started actions to encourage this initiative through the Ministry of the Environment and Natural Resources and the National Council for Climate Change and Clean Development Mechanism.
- There is an opportunity for an approach to climate risk management for the financial sector to be integrated into the emerging ESG integration framework in early development by the ABA.

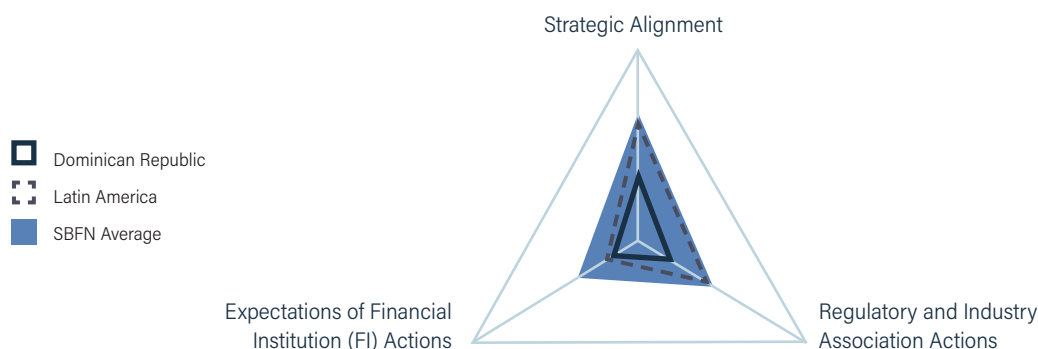




## Pillar 3: Financing Sustainability

### Pillar Progress: Developing

The Dominican Republic is in the **“Developing” sub-stage of the “Implementation” stage** for the Financing Sustainability Pillar. In 2020, the Superintendency of the Securities Market issued the Guidelines for the Issuance of Sustainable, Green, and Social Securities on the Dominican Republic Stock Exchange, establishing a national framework for promoting financial flows into green, climate, social, and sustainability-linked projects and sectors. There have also been ongoing awareness raising and capacity building on financing sustainability actions and expectations.



#### Sub-pillar 1: Strategic Alignment

- The Dominican Republic's national framework for financing sustainability, led by BVDR and its 2020 Green Bond Guide, mainly covers the capital markets. The ABA also has a plan to work with the central bank to develop a national green finance protocol to set up a broader framework to encourage financial flows into green and sustainability-focused assets.
- The approach of the Dominican Republic's financial sector to promoting financial flow into green and sustainability projects and sectors is in alignment with international good practices and standards, such as the International Capital Market Association's Principles for Green, Social, and Sustainability-Linked Bonds, and the Climate Bond Initiative's (CBI) Climate Bonds Standards.

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

- BDVR's Green Bond Guide includes a set of definitions and examples of sustainable finance assets and cites the CBI's Climate Bond Taxonomy.
- The Guide also provides details for the issuance of green, social, or sustainability bonds and the requirement for external party verification to ensure the credibility of

green bonds. The document promotes a high level of transparency and recommends that the management of funds by the issuer is supplemented through an external and independent review by an auditor or another third party to verify the funds' traceability method and allocation.

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

- The Guide requires issuers to publish annual updates on the performance and impacts of the sustainability instruments, to obtain and disclose independent review of metrics reported annually, and to report publicly on their green, social, and sustainability-focused financial activities and positive outcomes or impacts. The Green Bond Guide states:  
Such information should be provided to investors, who should also be informed of delivery of the independent verification report carried out after the issuance that mentioned it in the previous section. Likewise, both the independent verification report, such as the annual report, must be published on the issuer's website.

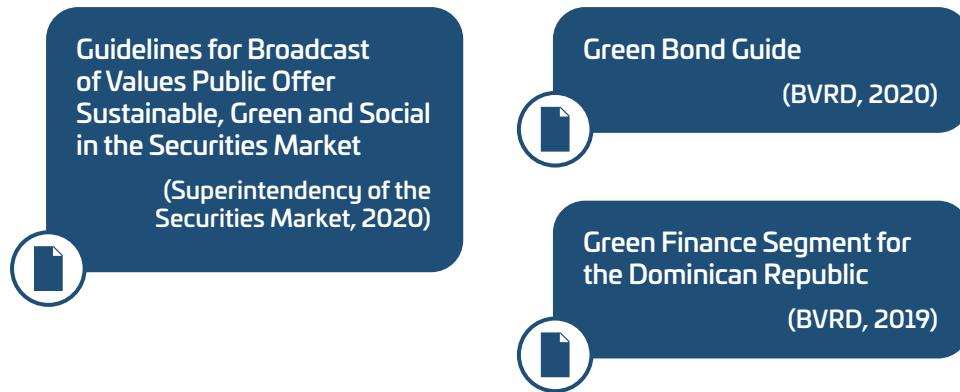
### 3. Progress by three sub-pillars and 11 indicators

Figure 4: Overview of the Dominican Republic'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**



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

# 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.



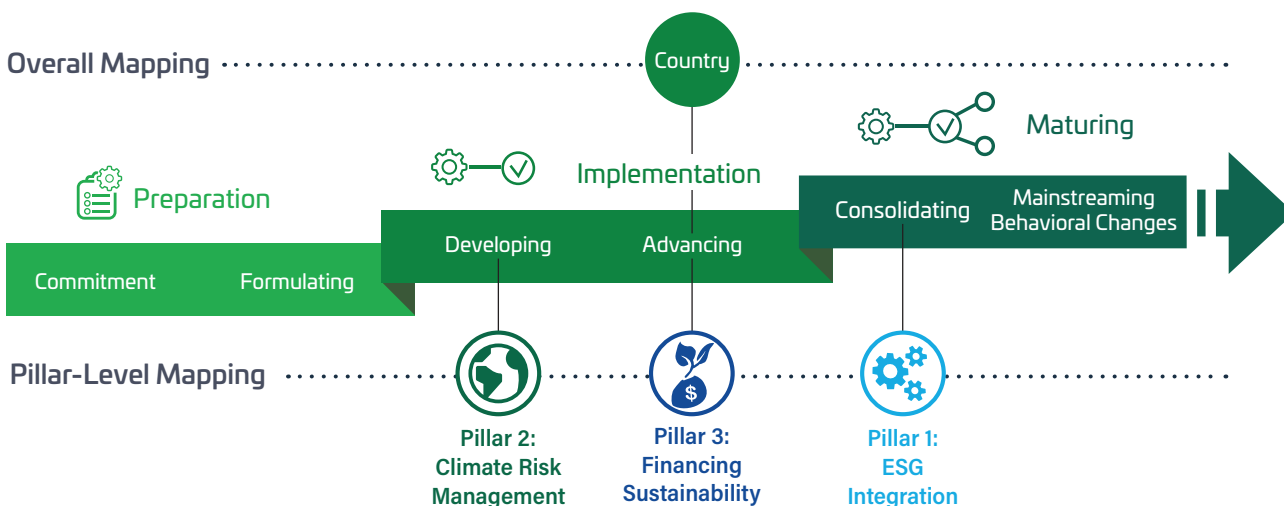
**Financing Sustainability** refers to initiatives by regulators and financial institutions to unlock capital flows for activities that support climate, green economy, and social goals. This includes new products like green bonds and sustainability-linked loans. Initiatives include definitions, guidance,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

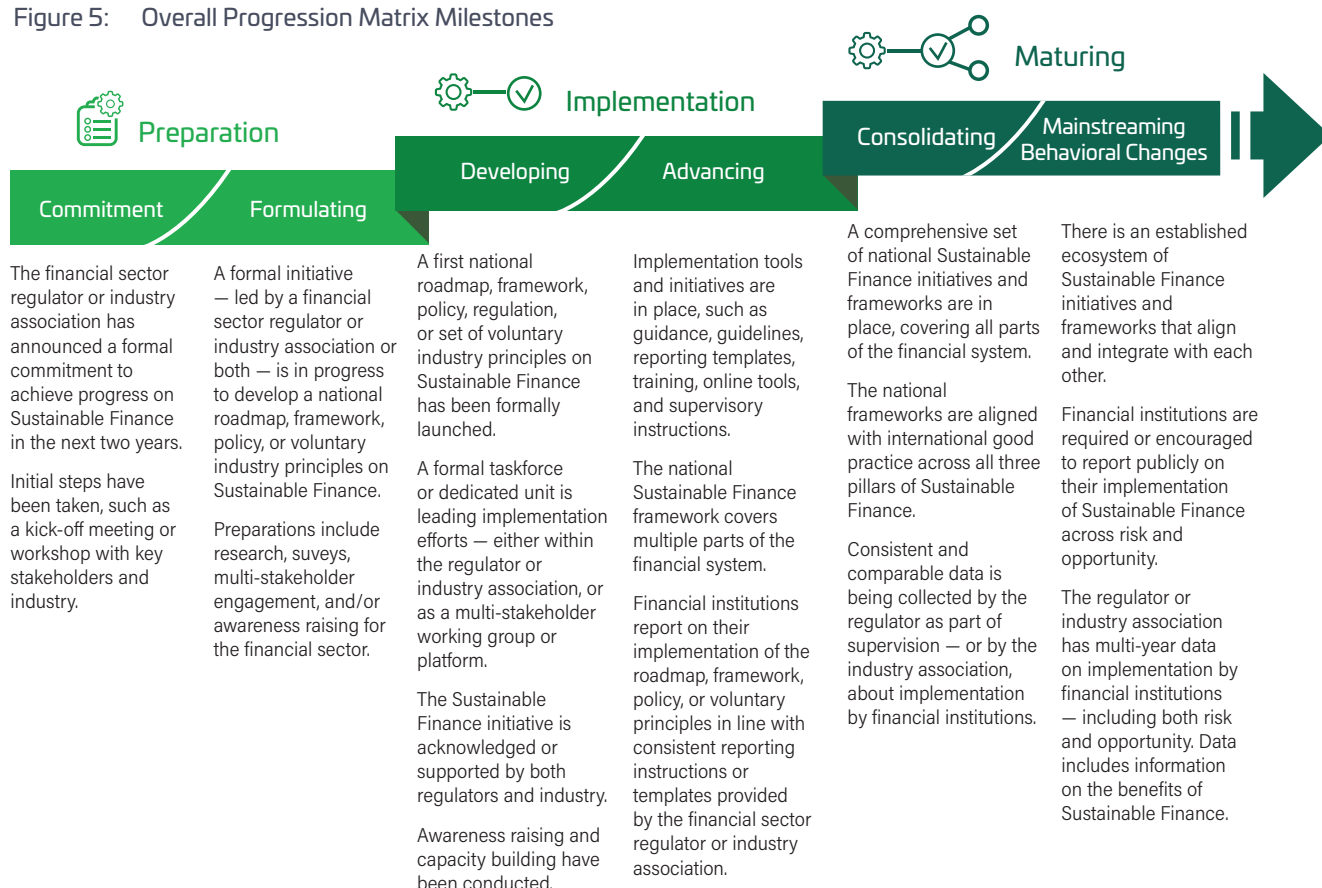


Figure 6: Progression Matrix Milestones – Pillar 1: ESG Integration

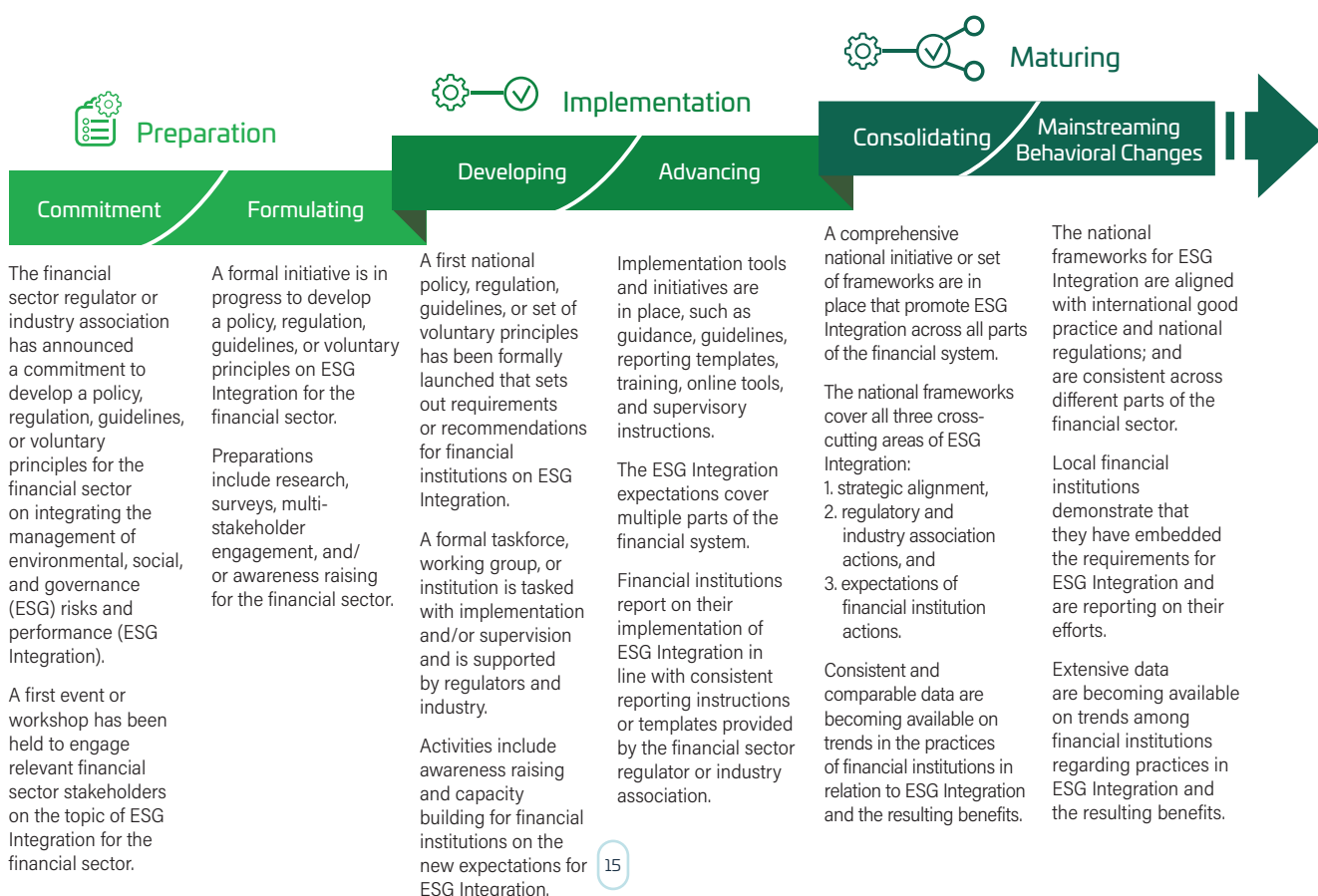


Figure 7: Progression Matrix Milestones – Pillar 2: Climate Risk Management

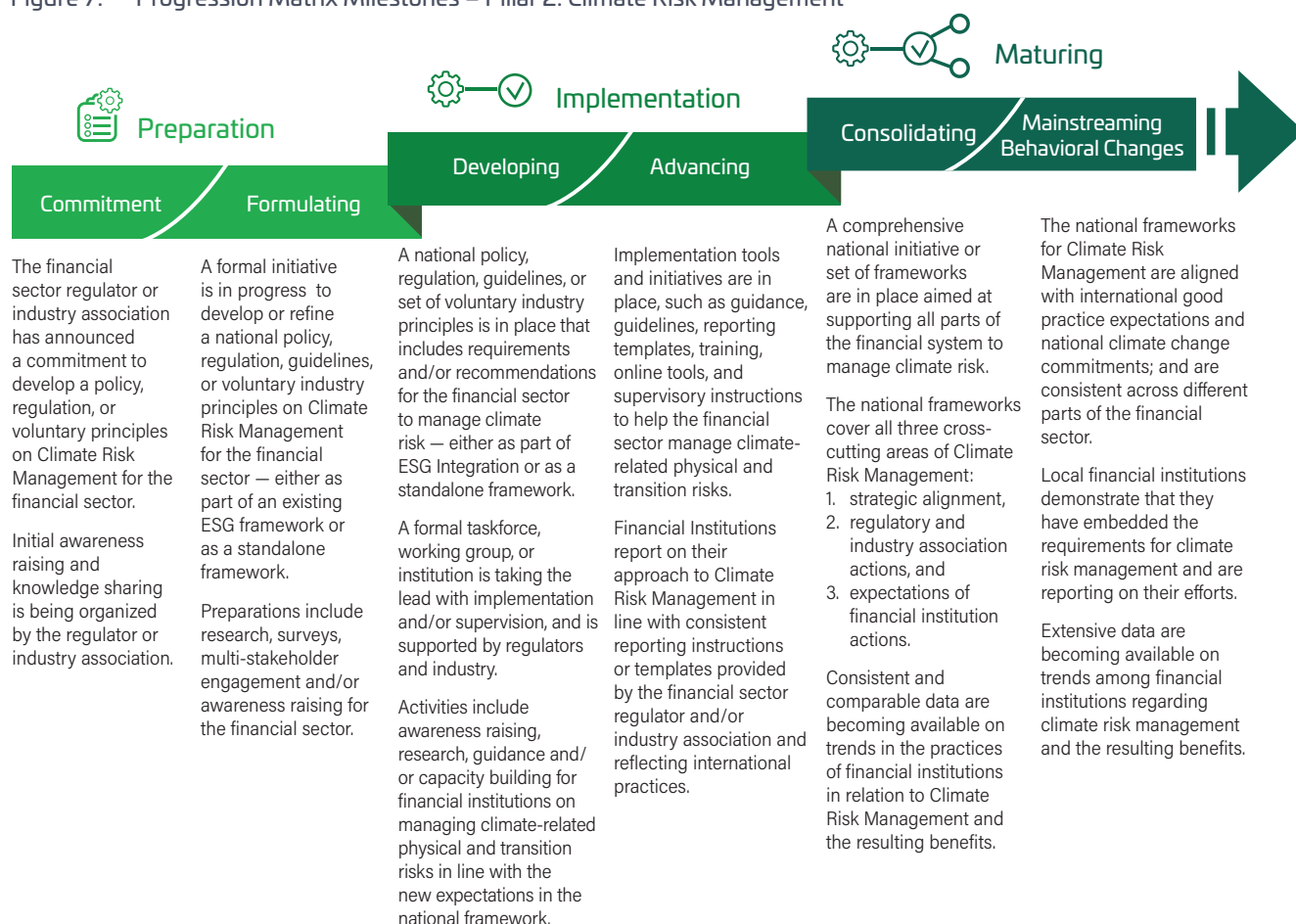
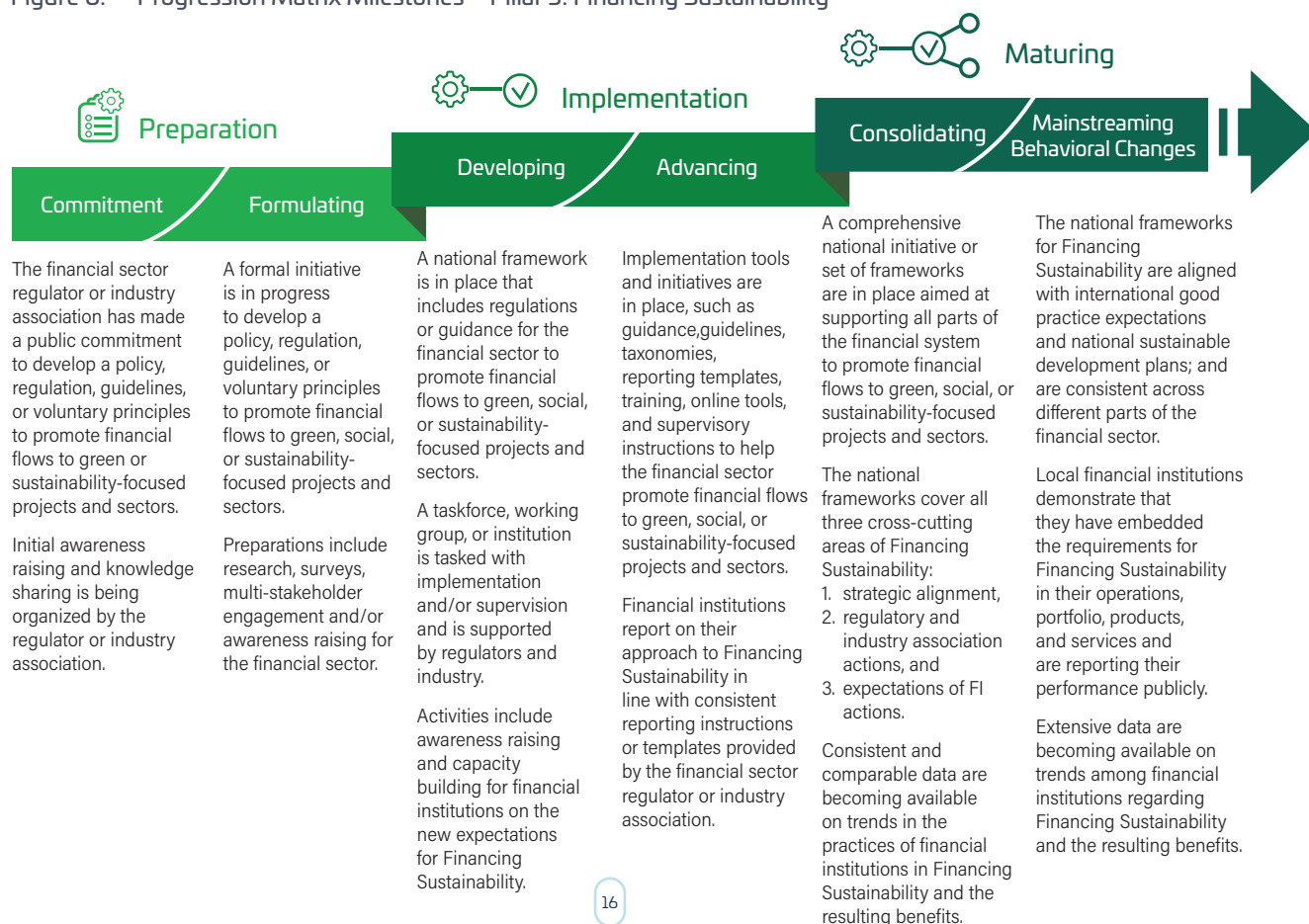


Figure 8: Progression Matrix Milestones – Pillar 3: Financing Sustainability



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