



**PRINCIPLES FOR
RESPONSIBLE
BANKING**

Reporting and Self-Assessment Form of PJSC Sovcombank

Reporting and Self-Assessment Requirements	High-level summary of bank's response (limited assurance required for responses to highlighted items)	Reference(s)/ Link(s) to bank's full response/ relevant information
<p>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.</p>		
<p>1.1 <i>Describe</i> (high-level) your bank's business model, including the main customer segments served, types of products and services provided, the main sectors and types of activities, and where relevant the technologies financed across the main geographies in which your bank has operations or provides products and services.</p>	<p>Sovcombank is a leading Russian private bank with strong market positions in retail, corporate, commercial and SME business. The bank actively develops treasury and trade finance operations. The geography of the Bank's activities embraces the entire territory of Russia. 17 thousand employees provide services to 9 million customers in 2 thousand offices and mini-offices located in 1 thousand cities and towns in 76 regions of Russia.</p> <p>Sovcombank provides its clients with a range of banking services in the following business segments:</p> <ul style="list-style-type: none"> - Retail banking: The Bank has leading positions in the retail segment, providing banking services to low-and middle-income retail customers, as well as micro, small business customers and individual entrepreneurs residing primary in small towns. - Corporate and Investment business: extending loans, providing investment and banking services to major Russian corporates, state-owned companies and the constituent entities of the Russian Federation. - Treasury operations: managing a portfolio of securities and liquidity. 	<p>See the section "About Sovcombank" and "Sustainable Banking" on p.10 and p.21 of the Sustainability report 2019: https://sovcombank.ru/en/about/sustainability</p>



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<p>1.2 Describe how your bank has aligned and/or is planning to align its strategy to be consistent with and contribute to society's goals, as expressed in the Sustainable Development Goals (SDGs), the Paris Climate Agreement, and relevant national and regional frameworks.</p>	<p>Sovcombank wholeheartedly supports the UN Sustainable Development Goals (SDGs) designed to address the world’s most pressing economic, environmental and social issues. With its operations, the Bank seeks to make a contribution towards achieving the SDGs, raise awareness about its approach and promote actual sustainability agenda in Russia.</p> <p>Sovcombank has been one of the first banks on the Russian market to incorporate environmental and social governance principles into its core business strategy. Bank’s leaders believe that sustainable investing allows for a longer-term approach and increased efficiency and that this feeds into its fiduciary duty to achieve the best long-term value for shareholders. Bank develops its sustainability / ESG strategy by adopting the best international practice.</p> <p>Sovcombank’s strategy sets out in the areas of responsible banking service, responsible and sustainable investment, and high standards of corporate governance. It focuses its sustainability efforts on the following areas:</p> <p><u>Transparency and corporate governance</u></p> <p>Sovcombank has transparent corporate governance system aimed at strengthening and maintaining the trust of bank’s stakeholders and at best decision making. Sovcombank’s corporate governance system complies with the Russian legislation and the requirements of the Central Bank of Russia. The bank takes into account recommendations for financial organisations from the Basel Committee on Banking Supervision and the Financial Stability Board, as well as the Principles of Corporate Governance by the G20 and the Organisation for Economic Co-operation and</p>	<p>See the section “Strategic sustainability priorities” on p. 13 of the Sustainability report 2019: https://sovcombank.ru/en/about/sustainability</p>
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	<p>Development.</p> <p>Sovcombank has a comprehensive set of policies to ensure that the Bank has effective oversight and control:</p> <ul style="list-style-type: none"> - Anti-corruption policy - Code of corporate ethics - Sustainability policy - Internal audit policy - Responsible financing policy - Green bond policy <p><u>Responsible and sustainable investment</u></p> <p>Sovcombank supports the UN SDGs by developing new financial instruments and by investing in socially- and environmentally efficient projects:</p> <ul style="list-style-type: none"> • Green financing. • Zero-carbon-emission energy generation and energy-saving projects, including small hydro, wind and solar, cleaner water, waste-water and heating utilities. • Support for micro-and small enterprises (SMEs) <p>The Bank owns a digital platform that enables 514 thousand SMEs to supply goods and services to the public sector. The digital platform provides access by issuing bank guarantees which SMEs require in order to participate in online tenders for public procurement. The Bank also operates the largest online platform for state and municipal procurement.</p> <p><u>Responsible lending</u></p> <ul style="list-style-type: none"> • Affordable banking for low-income clients in small towns 	
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	<p style="text-align: center;">and rurals</p> <p>Sovcombank provides a wide range of financial services and products to predominantly low-income customers in underbanked rural areas and remote locations of the Russian Federation. The Bank has 2 thousand offices located in 1 thousand predominantly rural, remote towns and villages in 76 Russian federal subjects.</p> <ul style="list-style-type: none"> • Financial literacy for older generation and low-income clients <p>Sovcombank is committed to providing public access to educational materials about money management, budgeting, saving and spending for our core clientele – clients of predominantly older age and having low income. The Bank supports inclusive access to finance and improving financial literacy in rural areas.</p> <p>Sovcombank established an ESG committee, which is responsible for overseeing the Bank's activities in the field of sustainable development. Its tasks include monitoring the Bank's work for compliance with the accepted obligations and recommendations of international standards on responsible financing, labor protection, health, social responsibility, environmental protection and corporate governance. Independent Director manages the committee.</p> <p>Sovcombank identified the goals set out in the SDGs and Paris Agreement that are of specific relevance to the society it operates in. The Bank is reviewing national and international frameworks to incorporate best practices to streamline implementation of the</p>	
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	Principles.	
<p>Principle 2: Impact and Target Setting</p>		
<p>We will work to continuously strengthen our Sustainable strategy via evaluating our corporate activity not just in terms of profits, but also in terms of their impacts on the environment, employment and products. We will increase as well our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products and services.</p>		
<p>2.1 Impact Analysis: <i>Show</i> that your bank has identified the areas in which it has its most significant (potential) positive and negative impact through an impact analysis that fulfills the following elements:</p>	<p>We used the UNEP FI Portfolio Impact Analysis Tool to undertake our impact analysis. We were able to analyse the products, services and activities in the bank’s retail, corporate and investment banking portfolios in Russia.</p> <p>The main sectors and industries we finance include energy, commercial and residential real estate, construction, mining, transport and retail. As this is our first iteration of using the Portfolio Impact Analysis Tool, there are a number of key assumptions underpinning the outputs of the Impact Analysis.</p> <p>The bank's area of presence is 100 % concentrated on the territory of Russia, including the client base.</p> <p>Sovcombank has taken into account the most relevant challenges and priorities related to sustainable development:</p> <ul style="list-style-type: none"> - promotion of social and economic development of the Bank’s region operations to increase financial inclusion of the population; - promotion of “Halva” instalment card to decrease poverty and increase customer’s consumption; 	



<p>a) <u>Scope</u>: The bank’s core business areas, products/services across the main geographies that the bank operates in have been as described under 1.1. have been considered in the scope of the analysis.</p> <p>b) <u>Scale of Exposure</u>: In identifying its areas of most significant impact the bank has considered where its core business/its major activities lie in terms of industries, technologies and geographies.</p> <p>c) <u>Context & Relevance</u>: Your bank has taken into account the most relevant challenges and priorities related to sustainable development in the countries/regions in which it operates.</p> <p>d) <u>Scale and intensity/salience of impact</u>: In identifying its areas of most significant impact, the bank has considered the scale and intensity/salience of the (potential) social, economic and environmental impacts resulting from the bank’s activities and provision of products and services. (your bank should have engaged with relevant stakeholders to help inform your analysis under elements c) and d))</p>	<p>- reducing Bank’s indirect environmental impact by financing environmental green projects in the field of zero-carbon- emissions energy, clean water and energy efficiency.</p> <p>Sovcombank will report further on the progress on impact analysis in the next reporting period.</p>	
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<p><i>Show that building on this analysis, the bank has</i></p> <ul style="list-style-type: none"> • Identified and disclosed its areas of most significant (potential) positive and negative impact • Identified strategic business opportunities in relation to the increase of positive impacts / reduction of negative impacts 		
<p>Please provide your bank's conclusion/statement if it has fulfilled the requirements regarding Impact Analysis.</p>		
<p>We have taken the first few steps in conducting our impact analysis by analysing the impacts associated with our consumer, corporate, investment and business banking portfolios. The next steps in our process will be to continue with our assessment of the scale and salience/intensity of the impacts we identified as being the most prominently associated with these portfolios to undertake an analysis of portfolio and to implement further improvements.</p>		
<p>2.2 Target Setting</p> <p><i>Show that the bank has set and published a minimum of two Specific, Measurable (can be qualitative or quantitative), Achievable, Relevant and Time-bound (SMART) targets, which address at least two of the identified "areas of most significant impact", resulting from the bank's activities and provision of products and services.</i></p> <p><i>Show that these targets are linked to and drive alignment with and greater contribution to appropriate Sustainable Development Goals, the goals of the Paris Agreement, and other relevant international, national or regional frameworks. The bank should have identified a baseline</i></p>	<p>The Bank has set the following targets by 2025 and now is reviewing them to align with the results from impact analysis to make substantial contributions:</p> <ul style="list-style-type: none"> • To implement assessment of environmental and social factors for all large corporate borrowers • To become one of a country leader in green financing <p>Bank's targets are liable in terms of responsible financing and cover SDGs 1,6,7,8,9,11,12.</p> <p>One of the responsible and socially-impactful projects already implemented is instalment card branded "Halva". In 2020, Sustainalytics, a leading global provider of ESG ratings, has issued an independent opinion on «Halva» as a social project, given the demographics of the clients, type of purchased products and that the bank does not charge its customers interest for the duration of</p>	<p>See Bank's "Sustainability Strategy" on p. 14 of Sustainability Report 2019 https://sovcombank.ru/en/about/sustainability</p>



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<p>(assessed against a particular year) and have set targets against this baseline.</p> <p><i>Show that the bank has analysed and acknowledged significant (potential) negative impacts of the set targets on other dimensions of the SDG/climate change/society's goals and that</i></p>	<p>the instalment plan.</p> <p>Sovcombank aims to increase the number of its projects aimed at propelling socially and environmentally sound economic development in the regions where it operates. By doing so, the Bank is making a considerable contribution to local economies, as it helps create jobs, increase household earnings and improve the state of the local environment.</p>	
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<p>it has set out relevant actions to mitigate those as far as feasible to maximize the net positive impact of the set targets.</p>		
<p>Please provide your bank's conclusion/statement if it has fulfilled the requirements regarding Target Setting.</p>		
<p>We have taken the first few steps in target setting and conducting our impact analysis by studying impacts associated with our consumer, corporate, business and investment banking portfolios. The next steps in our process will be to continue with our assessment of the scale and salience/intensity of the impacts we identified as being the most prominently associated with these portfolios, to undertake an analysis of portfolio and to implement further improvements.</p>		
<p>2.3 Plans for Target Implementation and Monitoring <i>Show</i> that your bank has defined actions and milestones to meet the set targets.</p> <p><i>Show</i> that your bank has put in place the means to measure and monitor progress against the set targets. Definitions of key performance indicators, any changes in these definitions, and any rebasing of baselines should be transparent.</p>	<p>To meet the set target (within the two goals set until 2025), the Bank has identified the following actions and benchmarks:</p> <ul style="list-style-type: none"> - to increase the issuance of "Halva" cards, social and green bonds - to assess corporate borrowers for compliance with the ESG principles - to gradually integrate environmental covenants into the loan agreements, a strategy which compels the borrowers from these sectors to adhere to solid ESG standards. <p>Sovcombank will report further on the progress in the next reporting period.</p>	<p>See Bank's "Sustainability Strategy" on p. 14 of Sustainability Report 2019 https://sovcombank.ru/en/about/sustainability</p>
<p>Please provide your bank's conclusion/statement if it has fulfilled the requirements regarding Plans for Target Implementation and Monitoring.</p>		
<p>We have taken the first few steps in target setting and conducting our impact analysis by analysing the impacts associated with our retail, corporate and investment banking portfolios. The next steps in our process will be to continue with our assessment of the scale and salience/intensity of the impacts we identified as being the most prominently associated with these portfolios, to undertake an analysis of portfolio and to implement further improvements.</p>		



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<p>2.4 Progress on Implementing Targets <u>For each target separately:</u></p> <p><i>Show</i> that your bank has implemented the actions it had previously defined to meet the set target.</p> <p>Or explain why actions could not be implemented / needed to be changed and how your bank is adapting its plan to meet its set target.</p> <p><i>Report</i> on your bank’s progress over the last 12 months (up to 18 months in your first reporting after becoming a signatory) towards achieving each of the set targets and the impact your progress resulted in. (where feasible and appropriate, banks should include quantitative disclosures)</p>	<p>Prior to issuing of green and social bonds, the Bank has developed responsible financing policies, established an ESG committee under the direction of the Supervisory Board, and set targets for the «Halva» card.</p> <p>In 2020, the bank published its first Sustainability report that informs the stakeholders about the results of Sovcombank activities and its performance on the sustainability issues.</p> <p>Sovcombank will report further on the progress in the next reporting period.</p>	
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Please provide your bank’s conclusion/statement if it has fulfilled the requirements regarding Progress on Implementing Targets

We have taken the first few steps in target setting and will report further on the progress in the next reporting period.

Principle 3: Clients and Customers
We will work responsibly with its clients and customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.

<p>3.1 <i>Provide an overview</i> of the policies and practices your bank has in place and/or is planning to put in place to promote responsible relationships with its customers. This should include high-level information on any programmes and actions implemented (and/or planned), their scale and, where possible, the results thereof.</p>	<p>Sovcombank has a comprehensive set of policies that promote responsible relationships with its customers:</p> <ul style="list-style-type: none"> - Anti-corruption policy - Code of corporate ethics - Sustainability policy - Internal audit policy - Responsible financing policy - Green bond policy <p><u>Anti-corruption policy</u> provides the basis for the Bank’s procedures aimed at preventing such issues. All staff and business partners must comply with this document. According to this policy, employees must report serious violations such as fraud, theft, bribery or corruption, which are in case of detection further investigated by Compliance and Fraud Management Department and reported to the Board of Directors.</p> <p><u>Code of corporate ethics</u> establishes set of corporate values, principles and rules of ethical business behavior, including rules for preventing corruption among employees and promotion of the responsible relationships with customers.</p> <p><u>Sustainability policy</u> covers stakeholder engagement, responsible finance, and social and environmental responsibility.</p>	<p>See Bank’s “Governance and sustainability” on p. 17 of Sustainability Report 2019: https://sovcombank.ru/en/about/sustainability</p>
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	<p><u>Internal audit policy</u> sets out the framework within which Internal Audit provides objective and independent assurance and advice to the Bank' Audit Committee, and to the Boards of Directors, over the processes and systems of internal control and risk management operating in the Bank.</p> <p><u>Supervisory Board approved responsible financing policy</u> for integration Principles for Responsible Banking into bank's operational activities.</p> <p><u>Green bond policy</u> was implemented for the advancement of responsible relationships with customers. The policy is aimed to direct investor's funding towards environmentally friendly activities (green bonds). The Bank has established a Green Bonds Committee, which is responsible for implementing the Policy and implementing the procedure to regulate the process of issuing green bonds.</p> <p>The Bank is working on the implementation of the following policies:</p> <ul style="list-style-type: none">- Water Resources Management Policy- Environmental and social policy- Antitrust Compliance Policy- Waste management policy- Diversity and equality policy among employees.- Inclusion in the Procurement and Supplier Policy, a program on environmental issues in the supply chain.	
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<p>3.2 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. This should include information on actions planned/implemented, products and services developed, and, where possible, the impacts achieved.</p>	<p>In 2020, Bank’s Management established an ESG committee to encourage sustainable practices and to enable sustainable economic activities. The committee makes strategic decisions and builds plans for sustainable development in the framework of interaction with clients providing responsible banking services.</p> <p>In particular, Sovcombank:</p> <ul style="list-style-type: none"> - made changes to the credit policy on reducing the cost of financing when fulfilling the ESG KPIs and covenants set to the borrower; reduction of ROE requirements for green loans; - located 21% of offices in sparsely populated and economically disadvantaged regions. This step shows that Sovcombank is already helping its clients to increase access to banking services; - launched a large-scale project “Halva” instalment card, which offers its holders zero interest rate purchases for up to 36 months. As of December 2020, more than 6 million clients held Halva card, the partner network comprised 200,000 retail online and offline shops. 82% of clients are people with middle and low income. <p>Thus, the Bank promotes the UN development goals in particular SDGs 1 and 8. “Halva” is not only an installment product, but also a smart, convenient and informative banking application that is easy to use. Since the Bank’s most clients are people of retirement age, people with low and middle income and people from provinces, the “Halva” banking application helps to increase the financial inclusion of the population.</p>	
<p>Principle 4: Stakeholders</p>		



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<p>We will proactively and responsibly consult, engage and partner with relevant stakeholders to achieve society's goals.</p>		
<p>4.1 Describe which stakeholders (or groups/types of stakeholders) your bank has consulted, engaged, collaborated or partnered with for the purpose of implementing these Principles and improving your bank's impacts. This should include a high-level overview of how your bank has identified relevant stakeholders and what issues were addressed/results achieved.</p>	<p>Sovcombank has consulted and collaborated for the purpose of implementing Principles and improving Bank's impacts with different stakeholders groups that were identified through interviews with heads of relevant business units, reviews of non-financial reports issued by domestic and global peer companies, and an analysis of internal regulations and media coverage.</p> <p>Sovcombank will report further on the results in the next reporting period.</p>	
<p>Principle 5: Governance & Culture We will implement our commitment to these Principles through effective governance and a culture of responsible banking</p>		
<p>5.1 Describe the relevant governance structures, policies and procedures your bank has in place/is planning to put in place to manage significant positive and negative (potential) impacts and support effective implementation of the Principles.</p>	<p>Bank's governance policies and procedures comply with the Russian legislation and the requirements of the Central bank of Russian Federation. Sovcombank takes into account recommendations for financial organizations from Basel Committee on Banking Supervision and the Financial Stability Board, as well as the Principles of Corporate Governance developed by the G20 and the Organization for Economic Co-operation and Development.</p> <p>Sovcombank governance structure is aimed at strengthening and implementation of the best sustainability practices. For these purposes, there were created ESG committee, Remuneration committee, Risk committee and Strategy committee that are managed by Independent Directors, Supervisory Board and Chairman of the Board. Committee's members are senior officials from all areas of the bank, including Sustainability, Risk, IR, Treasury, Data & Analytics, Retail, Energy Climate & Infrastructure,</p>	<p>See Bank's "Governance structure" of Sustainability Report 2019 https://sovcombank.ru/en/about/sustainability</p>



	<p>Corporate, Institutional & Business Banking. On the monthly basis committees report to the Supervisory Board and Chairman of the Board on the progress made.</p> <p>Sovcombank developed a Code of Corporate Ethics to help maintain a better connection with stakeholders. Additionally, Bank implemented Sustainability policy to strengthen stakeholder' and employees' social and environmental responsibility and to communicate the importance of participating in and supporting internationally recognized initiatives and standards. Sovcombank is also reviewing its credit policies to develop responsible financing.</p>	
<p>1.2 Describe the initiatives and measures your bank has implemented or is planning to implement to foster a culture of responsible banking among its employees. This should include a high-level overview of capacity building, inclusion in remuneration structures and performance management and leadership communication, amongst others.</p>	<p>To achieve an effective implementation of this goal, it is very important that all bank employees are involved. Sovcombank understands that an effective corporate culture is a key to success and pays big attention to its development.</p> <p>So to foster a culture of responsible banking bank is implementing the following programs:</p> <ul style="list-style-type: none"> - Development of the bank's corporate brand and social image of the responsible and sustainable organization; - Identification and promotion of corporate values and work principles; - Building an internal corporate communication system; - Development of a corporate knowledge-sharing system, as well as a system to collect and record employees suggestions. <p>For effective realization of this programs bank established:</p> <ul style="list-style-type: none"> - Internal portal for reporting on the Achievements and 	<p>See Bank's "Human capital" on p. 27-32 of Sustainability Report 2019: https://sovcombank.ru/en/about/sustainability</p>



	<p>business communication system Pyrus (for tracking tasks, checking documents, addressing administrative issues and etc.);</p> <ul style="list-style-type: none"> - Corporate telegram channel that helps to communicate on all respective issues (for example, to collect and record employees suggestions and to conduct social surveys) and allows to receive an advanced feedback. Advanced feedback is very important tool as it helps to make sure that all employees are fully understand bank’s objective and in case of misunderstanding helps to adjust the further actions plan; - Training of employees about sustainability, including the Principles for Responsible Banking and everyone’s role in implementing them; - Meetings at various managerial level of the bank where all current issues on the relevant topic are discussed; - Corporate newspaper, which communicate to all employees bank’s vision, strategic focus, main objectives and events; - Interbank competitions with subsequent rewarding. 	
<p>5.1 Governance Structure for Implementation of the Principles <i>Show that your bank has a governance structure in place for the implementation of the PRB, including:</i></p> <ul style="list-style-type: none"> a) target-setting and actions to achieve targets set b) remedial action in the event of targets or milestones not being achieved or unexpected 	<p>Sovcombank has committees that set and monitor implementation of the PRBs. Principles are determined by ESG, Remuneration, Risk and Strategy committee and managed by the Independent Directors and the Chairman of the Board.</p>	<p>See Bank’s “Governance structure” on p. 16 of Sustainability Report 2019: https://sovcombank.ru/en/about/sustainability</p>



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negative impacts being detected.		
Please provide your bank's conclusion/ statement if it has fulfilled the requirements regarding Governance Structure for Implementation of the Principles.		
<p>Sovcombank has established a governance structure in order to be sure that Principles are implemented effectively. Bank has established relevant committees (ESG committee, Remuneration committee, Risk committee and Strategy committee) that are working on strengthening and maintaining implementation of the sustainable practices. Committees are managed by Independent Directors, Supervisory Board and Chairman of the Board. Committee's members are senior officials from all areas of the bank, including Sustainability, Risk, Treasury, Data & Analytics, Retail, Energy Climate & Infrastructure, Corporate, Institutional & Business Banking.</p> <p>Additionally, Sovcombank established interbank Working Group. Members of this Working group are employees from the middle management level, who are collecting and analyzing information among their subordinates. The purpose of this Group is to collect feedback from the employees of different levels and convey it to the Committee members and to the Chairman of the Board. Thus the bank applies kind of "360 degree evaluation method", that eliminated misunderstanding among bank employees and corrects their actions in case of need.</p>		
<p>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.</p>		
<p>6.1 Progress on Implementing the Principles for Responsible Banking</p> <p><i>Show that your bank has progressed on implementing the six Principles over the last 12 months (up to 18 months in your first reporting after becoming a signatory) in addition to the setting and implementation of targets in minimum two areas (see 2.1-2.4).</i></p>	<p>Additionally to the previously disclosed programmes for implementation of the PRBs, Bank is currently working on:</p> <ul style="list-style-type: none"> - further improvement of its corporate culture; - promoting charity work; - improving its client's policy; - developing of the infrastructure and social programs; - environmental and social policy, that discloses Bank's approach to direct environmental impacts that are arising from the Bank's use of natural resources and to indirect environmental impacts that are arising through financial transactions carried out by the Bank; 	<p>See Bank's "Social and Environmental impact" on p. 37 of Bank's Sustainability Report 2019: https://sovcombank.ru/en/about/sustainability</p>



<p><i>Show that your bank has considered existing and emerging international/regional good practices relevant for the implementation of the six Principles for Responsible Banking. Based on this, it has defined priorities and ambitions to align with good practice.</i></p> <p><i>Show that your bank has implemented/is working on implementing changes in existing practices to reflect and be in line with existing and emerging international/regional good practices and has made progress on its implementation of these Principles.</i></p>	<ul style="list-style-type: none"> - further using of resource-saving technologies; - raising awareness among employees on environmental issues and encouraging to work in accordance with the environmental principles; - involving Bank employees in activities that reduce environmental risk, improve environmental management system and improve environmental performance indicators; - adding environmental issues in all relevant decision-making processes. <p>In its approach, Bank follows international practices and recommendations that help to define priorities and to correct the direction. For example:</p> <ul style="list-style-type: none"> - Bank implemented green office concept to reduce its use of resources, although Bank's business operations do not have significant impact on the environment; - Sovcombank continues to work on reducing its indirect environmental impact by financing environmental friendly projects in the field of zero-carbon- emissions energy, clean water and energy efficiency; considers social and environmental risks in its lending and investment processes; - Bank implemented a Responsible Financing Policy that systematizes the banks approach to responsible financing, specifies the goals and principles of responsible financing and establishes the management and organizational basis for responsible financing, while regulating the Bank's impact on the environment through its business. One of the goals of this policy is to reduce negative environmental and social impacts and to increase positive environmental and social effects of the Bank's operational activities. 	
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Please provide your bank's conclusion/statement if it has fulfilled the requirements regarding Progress on Implementing the Principles for Responsible Banking

Sovcombank made a progress over the first 18 months of implementing the Principles. The bank is working to improve the disclosures on responsible and sustainable banking practices and will report further on the progress in the next reporting period.