First report

Principles of Responsible Banking
## 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.

### 1.1. Business model

Describe (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 across the main geographies in which your bank operates or provides products and services. Please also quantify the information by disclosing e.g., the distribution of your bank’s portfolio (%) in terms of geographies, segments (i.e., by balance sheet and/or off-balance sheet) or by disclosing the number of customers and clients served.

<table>
<thead>
<tr>
<th>Response:</th>
<th>Links and references (incl. pages)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Banco Promerica Guatemala’s mission is to promote a bank that develops relationships and offers products and services to our communities, to help them overcome their limits to achieve success. Banco Promerica has a wide variety of commercial banking products and services, focused on the areas of retail banking, business banking and SMEs, and electronic means of payment for different customer segments. We are made up of a network of 104 branches, 3,645 bank agents, 255 ATMs and more than 4,000 employees.</td>
<td>¿Quiénes somos? Banca de personas, Banca de Empresas y pymes Canales de servicio gprom.co/p/E5ZRD65Z Memoria anual 2021, pagina 10. gprom.co/p/R7A9A73Z</td>
</tr>
</tbody>
</table>

### 1.2. Strategy alignment

Does your corporate strategy identify and reflect sustainability as strategic priority/ies for your bank?

- Yes
- No

Please describe how your bank has aligned and/or is planning to align its strategy to be consistent with the Sustainable Development Goals (SDGs), the Paris Climate Agreement, and relevant national and regional frameworks.

Does your bank also reference any of the following frameworks or sustainability regulatory reporting requirements in its strategic priorities or policies to implement these?

- [ ] UN Guiding Principles on Business and Human Rights
- [ ] International Labour Organization fundamental conventions
- [X] UN Global Compact
- [ ] Any applicable regulatory reporting requirements on environmental risk assessments, e.g. on climate risk - please specify which ones: __________________
- [ ] Any applicable regulatory reporting requirements on social risk assessments, e.g. on modern slavery - please specify which ones: __________________
- [ ] None of the above
At Banco Promerica Guatemala, we have a Regional Sustainability Strategy based on four strategic axes: sustainable business, impact measurement, sustainable investment and leading by example. In 2021, Banco Promerica Guatemala became an official signatory of the United Nations Principles for Responsible Banking. Similarly, it seeks to align its strategy and practices with the SDGs.

The objectives in which we directly impact as Banco Promerica Guatemala for Sustainable Development are:

- SDG 4; Quality education.
- SDG 8; Decent work and economic growth.
- SDG 13; Climate action.

We are adhered to the United Nations Global Compact Guatemala.
**Principle 2: Impact and Target Setting**

We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products, and services. To this end, we will set and publish targets where we can have the most significant impacts.

### 2.1. Impact Analysis (Key Step 1)

Show that your bank has performed an impact analysis of its portfolio/s to identify its most significant impact areas and determine priority areas for target-setting. The impact analysis shall be updated regularly and fulfil the following requirements/elements (a-d):

**a) Scope:** What is the scope of your bank’s impact analysis? Please describe which parts of the bank’s core business areas, products/services across the main geographies that the bank operates in (as described under 1.1) have been considered in the impact analysis. Please also describe which areas have not yet been included, and why.

**b) Portfolio composition:** Has your bank considered the composition of its portfolio (in %) in the analysis? Please provide proportional composition your portfolio globally and per geographical scope

i) by sectors & industries for business, corporate and investment banking portfolios (i.e. sector exposure or industry breakdown in %), and/or

ii) by products & services and by types of customers for consumer and retail banking portfolios.

If your bank has taken another approach to determine the bank’s scale of exposure, please elaborate, to show how you have considered where the bank’s core business/major activities lie in terms of industries or sectors.

**Response:**

In order to carry out a diagnose based Banco Promerica’s most important loan portfolio, the segments analysed in this initial phase were Business Loans and Real Estate Businesses, which together represent 39% share of the total loan portfolio.

Thanks to the availability of internal data and information from our ARAS, a better understanding of the effects of these portfolios can be obtained.

In our future reports we will seek to conduct an analysis that includes the rest of our portfolios, to generate a comprehensive overview of the positive and negative impacts, in order to develop a strategy that is aligned to contribute to the resolution of the needs of the countries in which we have a presence.

**Links and references**

PPT Resultados Impactool
gprom.co/p/D4BFBNKS

**Response:**

Within the corporate loan portfolio, the placement of loans in the five countries with the largest share of the portfolio was considered. The following are listed below with their respective percentages of participation: Guatemala (63.8%), Costa Rica (13.9%), Panama (10.5%), Ecuador (6.8%) and Nicaragua (5.8%). Panama (10.5%), Ecuador (6.8%) and Nicaragua (5.0%)

Likewise, the main economic sectors within the business portfolio are: Wholesale and retail trade (26.5%), Real Estate Activities (17.0%), Construction (15.5%) and Manufacturing (11.4%), with these four activities accounting for 85.6% of the Corporate and Real Estate Business portfolios.

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1 That means that where the initial impact analysis has been carried out in a previous period, the information should be updated accordingly, the scope expanded as well as the quality of the impact analysis improved over time.

2 Further guidance can be found in the Interactive Guidance on impact analysis and target setting

3 Key sectors relative to different impact areas, i.e. those sectors whose positive and negative impacts are particularly strong, are particularly relevant here.
c) **Context:** What are the main challenges and priorities related to sustainable development in the main countries/regions in which your bank and/or your clients operate? Please describe how these have been considered, including what stakeholders you have engaged to help inform this element of the impact analysis.

This step aims to put your bank’s portfolio impacts into the context of society’s needs.

Response:

Through the Context Module of the Impact Analysis Tool, it was determined that the main common needs of the five countries under analysis are: Integrity & security of person, Availability, accessibility, affordability, quality of resources & services, Livelihood, Socio-economic convergence, and Biodiversity & healthy ecosystems.

These five pillars include challenges such as: conflict resolution at both the political and criminal levels, modern slavery, child labor, ensuring data privacy, access to resources and basic needs, unemployment, and care for the environment.

**d)** Based on these first 3 elements of an impact analysis, what positive and negative impact areas has your bank identified? Which (at least two) significant impact areas did you prioritize to pursue your target setting strategy (see 2.2)? Please disclose.

Response:

A positive impact of 100% was achieved in 4 out of 12 pillars of needs that were diagnosed in the Context Module. These positive areas of impact include Health & safety, Availability, accessibility, affordability, quality of resources & services, Healthy economies and Circularity.

Opportunities for improvement are found in the pillars of Climate stability, Biodiversity and healthy ecosystems, circularity, and Integrity & Safety of person.

Regarding the prioritization of areas to develop our strategy, it is in process since the diagnosis through the Impact Analysis Tool is the first phase, one of the next steps is to align the areas of need with the strategy in order to continue with the efforts to implement sustainable dynamics within the organization.

**e)** For these (min. two prioritized impact areas): **Performance measurement:** Has your bank identified which sectors & industries as well as types of customers financed or invested in are causing the strongest actual positive or negative impacts? Please describe how you assessed the performance of these, using appropriate indicators related to significant impact areas that apply to your bank’s context.

In determining priority areas for target-setting among its areas of most significant impact, you should consider the bank’s current performance levels, i.e. qualitative and/or quantitative indicators and/or proxies of the social, economic and environmental impacts resulting from the bank’s activities and provision of products and services. If you have identified climate and/or financial health&inclusion as your most significant impact areas, please also refer to the applicable indicators in the Annex.

If your bank has taken another approach to assess the intensity of impact resulting from the bank’s activities and provision of products and services, please describe this.

The outcome of this step will then also provide the baseline (incl. indicators) you can use for setting targets in two areas of most significant impact.

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4 Global priorities might alternatively be considered for banks with highly diversified and international portfolios.

5 To prioritize the areas of most significant impact, a qualitative overlay to the quantitative analysis as described in a), b) and c) will be important, e.g. through stakeholder engagement and further geographic contextualization.
Response:

Banco Promerica’s mission is to promote a banking system that develops relationships and offers products and services to our communities, to help them overcome their limits, whether cultural, economic, personal, or geographic. That is why our products are focused on creating opportunities for productive segments and with the results of the materiality analysis we will have the basis for a strategy development.

Self-assessment summary:

Which of the following components of impact analysis has your bank completed, in order to identify the areas in which your bank has its most significant (potential) positive and negative impacts?

Scope: Si ☑️ In progress ☐, No ☐
Context: Si ☑️ In progress ☐, No ☐
Portfolio composition: Si ☑️ In progress ☐, No ☐
Performance measurement: Si ☑️ In progress ☐, No ☐

Which most significant impact areas have you identified for your bank, as a result of the impact analysis?
Climate change mitigation, climate change adaptation, resource efficiency & circular economy, biodiversity, financial health & inclusion, human rights, gender equality, decent employment, water, pollution, other: please specify

How recent is the data used for and disclosed in the impact analysis?

☑️ Up to 6 months prior to publication
☐ Up to 12 months prior to publication
☐ Up to 18 months prior to publication
☐ Longer than 18 months prior to publication

Open text field to describe potential challenges, aspects not covered by the above etc.: (optional)

2.2. Target Setting (Key Step 2)

Show that your bank has set and published a minimum of two targets which address at least two different areas of most significant impact that you identified in your impact analysis.

The targets have to be Specific, Measurable (qualitative or quantitative), Achievable, Relevant and Time-bound (SMART). Please disclose the following elements of target setting (a-d), for each target separately:

a) Alignment: which international, regional or national policy frameworks to align your bank’s portfolio with have you identified as relevant? Show that the selected indicators and 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.

You can build upon the context items under 2.1.

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6 You can respond “Yes” to a question if you have completed one of the described steps, e.g. the initial impact analysis has been carried out, a pilot has been conducted.
7 Operational targets (relating to for example water consumption in office buildings, gender equality on the bank’s management board or business-trip related greenhouse gas emissions) are not in scope of the PRB.
8 Your bank should consider the main challenges and priorities in terms of sustainable development in your main country/ies of operation for the purpose of setting targets. These can be found in National Development Plans and strategies, international goals such as the SDGs or the Paris Climate Agreement, and regional frameworks. Aligning means there should be a clear link between the bank’s targets and these frameworks and priorities, therefore showing how the target supports and drives contributions to the national and global goals.
**b) Baseline:** Have you determined a baseline for selected indicators and assessed the current level of alignment? Please disclose the indicators used as well as the year of the baseline. You can build upon the performance measurement undertaken in 2.1 to determine the baseline for your target.

A package of indicators has been developed for climate change mitigation and financial health & inclusion to guide and support banks in their target setting and implementation journey. The overview of indicators can be found in the Annex of this template.

If your bank has prioritized climate mitigation and/or financial health & inclusion as (one of) your most significant impact areas, it is strongly recommended to report on the indicators in the Annex. Please include the relevant indicators using the indicator code in the following table:

**c) SMART targets (incl. key performance indicators (KPIs)):** Please disclose the targets for your first and your second area of most significant impact, if already in place (as well as further impact areas, if in place). Which KPIs are you using to monitor progress towards reaching the target? Please disclose.

**d) Action plan:** Which actions including milestones have you defined to meet the set targets? Please describe. Please also show that your bank has analysed and acknowledged significant (potential) indirect impacts of the set targets within the impact area or on other impact areas and that it has set out relevant actions to avoid, mitigate, or compensate potential negative impacts.

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**Response:**

The assessment through the Impact Analysis Tool constitutes the first phase of diagnosis, we are in the process of establishing these objectives in order to continue with the efforts to implement sustainable dynamics within the organization.

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*Key Performance Indicators are chosen indicators by the bank for the purpose of monitoring progress towards targets.*
Self-assessment summary

Which of the following components of target setting in line with the PRB requirements has your bank completed or is currently in a process of assessing for your.

<table>
<thead>
<tr>
<th>First area of most significant impact: (please name it)</th>
<th>Second area of most significant impact: (please name it)</th>
<th>(If you are setting targets in more impact areas)... your third (and subsequent) area(s) of impact: (please name it)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alignment</td>
<td>Baseline</td>
<td>OSMART targets</td>
</tr>
<tr>
<td>Yes □ In progress ✗ No □</td>
<td>Yes □ In progress ✗ No □</td>
<td>Yes □ In progress ✗ No □</td>
</tr>
<tr>
<td>Baseline</td>
<td>OSMART targets</td>
<td>Action plan</td>
</tr>
<tr>
<td>Yes □ In progress ✗ No □</td>
<td>Yes □ In progress ✗ No □</td>
<td>Yes □ In progress ✗ No □</td>
</tr>
<tr>
<td>OSMART targets</td>
<td>Action plan</td>
<td></td>
</tr>
<tr>
<td>Yes □ In progress ✗ No □</td>
<td>Yes □ In progress ✗ No □</td>
<td></td>
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<tr>
<td>Action plan</td>
<td></td>
<td></td>
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<tr>
<td>Yes □ In progress ✗ No □</td>
<td></td>
<td></td>
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</tbody>
</table>

2.3. Target implementation and monitoring (Key Step 2)
For each target separately:

Show that your bank has implemented the actions it had previously defined to meet the set target. Report on your bank’s progress since the last report towards achieving each of the set targets and the impact your progress resulted in, using the indicators and KPIs to monitor progress you have defined under 2.2.

Or, in case of changes to implementation plans (relevant for 2nd and subsequent reports only): describe the potential changes (changes to priority impact areas, changes to indicators, acceleration/review of targets, introduction of new milestones or revisions of action plans) and explain why those changes have become necessary.

Response:

The assessment through Impact Analysis Tool constitutes the first phase of diagnosis, we are in the process of establishing these objectives in order to continue with the efforts to implement sustainable dynamics within the organization.

Principle 3: Clients and Customers

We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.

3.1. Client engagement

Does your bank have a policy or engagement process with clients and customers\(^{\text{a}}\) in place to encourage sustainable practices?

Yes □ In progress ✗ No □

Does your bank have a policy for sectors in which you have identified the highest (potential) negative impacts?

Yes □ In progress ✗ No □

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\(^{\text{b}}\). It should include information on relevant policies, actions planned/implemented to support clients’ transition, selected indicators on client engagement and, where possible, the impacts achieved. This should be based on and in line with the impact analysis, target-setting and action plans put in place by the bank (see P2).

\(^{\text{a}}\) A client engagement process is a process of supporting clients towards transitioning their business models in line with sustainability goals by strategically accompanying them through.

\(^{\text{b}}\) Sustainable economic activities promote the transition to a low-carbon, more resource-efficient and sustainable economy.

08 - Principle 2: Impact and Target Setting - Principle 3: Clients and Customers
Policies and processes:

Banco Promerica Guatemala is in the process of carrying out a materiality analysis and a matrix to establish the baseline for the creation of a sustainability policy. Banco Promerica Guatemala is developing a non-discrimination policy, which promotes and defines the commitments to promote a work environment that is equitable and respectful.

3.2. Business opportunities

Describe what strategic business opportunities in relation to the increase of positive and the reduction of negative impacts your bank has identified and/or how you have worked on these in the reporting period. Provide information on existing products and services, information on sustainable products developed in terms of value (USD or local currency) and/or as a % of your portfolio, and which SDGs or impact areas you are striving to make a positive impact on (e.g. green mortgages – climate, social bonds – financial inclusion, etc.).

Response:

Banco Promerica has a YouTube channel through which it provides support to its clients with financial education issues and the operation of the bank’s products and services.

Banco Promerica has green products and services that are within its green lines; these products contribute to sustainability by supporting the transition towards a low carbon economy.

They have a Product for Banking companies and SMEs called green credits, for energy efficiency and renewable energy and the green account, whose resources are directed to projects that help care for the environment.

Banco Promerica carries out strategic cooperation with co-brands to offer cards with benefits. These brands are regional, such as Office Depot, Spirit, Iberia, Avianca, Lifemiles and Copa Airlines.

Likewise, the bank establishes relationships with different international organizations with funding lines to carry out operations aligned with the group’s strategy. These alliances are with: DEG, PROPARCO, IFC, IDB, DFC, FMO, Norfund, responsAbility, BlueOrchard, Financ in Motion, correspondent banks and the main local banks.

Links and references
- Canal de YouTube - La Boveda Verde:
  [gprom.co/p/CFSDDPBX](gprom.co/p/CFSDDPBX)
- Green Credits:
  [gprom.co/p/CR38QX6M](gprom.co/p/CR38QX6M)
- Banco Promerica, S.A. Estados Financieros por el año terminado el 31 de diciembre de 2021 página 39:
  [gprom.co/p/957RTFST](gprom.co/p/957RTFST)
**Principle 4: Stakeholders**

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

### 4.1. Stakeholder identification and consultation

Does your bank have a process to identify and regularly consult, engage, collaborate, and partner with stakeholders (or stakeholder groups) you have identified as relevant in relation to the impact analysis and target setting process?

Yes ☐  In progress ☑  No ☐

Does your bank have a policy for sectors in which you have identified the highest (potential) negative impacts?

Yes ☐  In progress ☑  No ☐

Please describe which stakeholders (or groups/types of stakeholders) you have identified, consulted, engaged, collaborated or partnered with for the purpose of implementing the Principles and improving your bank’s impacts. This should include a high-level overview of how your bank has identified relevant stakeholders, what issues were addressed/results achieved and how they fed into the action planning process.

**Response:**

We are in the process of starting our materiality study. The Bank has a corporate Volunteer Program led at the group level. Banco Promerica Guatemala has begun an analysis or design process for the establishment and implementation of a green office program, The Bank has a Human Resources Department where Human Talent Management issues are handled.

On the other hand, for professional development, depending on the position, it supports training in specific technical topics, with mentoring for soft skills, reimbursement of studies and Career Plan and other additional benefits to those provided by law.

Regarding the hiring and management of talent, Banco Promerica has a Salary Equity Policy, they evaluate performance periodically and measure the organizational climate. This information and initiatives are transmitted to all its collaborators with the support of generalists, who are people located at different points and areas who disseminate the information.

**Links and references**

- Grupo Promerica celebró el Día del Voluntariado Promericano: gprom.co/p/SQPS4KG5
- Memoria Annual 2021 gprom.co/p/R7A9A73Z

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**Notes:** Such as regulators, investors, governments, suppliers, customers and clients, academia, civil society institutions, communities, representatives of indigenous population and non-profit organizations.
**Principio 5: Governance & Culture**

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

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**5.1. Governance Structure for Implementation of the Principles**

Does your bank have a governance system in place that incorporates the PRB?

Yes ☐  In progress ☑  No ☐

Please 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 the effective implementation of the principles. This includes information about:

- which committee has responsibility over the sustainability strategy as well as targets approval and monitoring (including information about the highest level of governance the PRB is subjected to),
- details about the chair of the committee and the process and frequency for the board having oversight of PRB implementation (including remedial action in the event of targets or milestones not being achieved or unexpected negative impacts being detected), as well as
- remuneration practices linked to sustainability targets.

Response:

Banco Promerica has solid values within its strategy, Permanent Empathy, Entrepreneurs by Nature, Shared Trust and Common Culture

We have a Code of Ethics and Conduct, which aims to promote a culture based on ethical and moral values, internally impacting directors, officers, and collaborators and is governed by an ethics committee that is responsible for ensuring compliance.

Within Business Banking, the sustainability department is led, which is in charge of mainstreaming the strategy within the bank and being a support for each area.

We also have a SARAS policy, and we are migrating towards a management system. We have technical assistance from FMO – Dutch Bank which is giving us the accompaniment.

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**5.2. Promoting a culture of responsible banking:**

Describe the initiatives and measures of your bank to foster a culture of responsible banking among its employees (e.g., capacity building, e-learning, sustainability trainings for client-facing roles, inclusion in remuneration structures and performance management and leadership communication, amongst others).

Response:

Grupo Promerica held its first sustainable Bootcamp in Guatemala City with the participation of the Netherlands Development Finance Company (FMO), the four main topics that were worked on were Green Lines, High Potential Segment, ESG Criteria, and Talent.
5.3. Policies and due diligence processes

Does your bank have policies in place that address environmental and social risks within your portfolio? Please describe.

Please describe what due diligence processes your bank has installed to identify and manage environmental and social risks associated with your portfolio. This can include aspects such as identification of significant/salient risks, environmental and social risks mitigation and definition of action plans, monitoring and reporting on risks and any existing grievance mechanism, as well as the governance structures you have in place to oversee these risks.

Response:

The basis of the sustainability policy and strategy is the management of environmental, social and governance risk ARAS. The objective of the SARAS is to guide the process of identifying the impacts that the credit operations of the clients may have. The process is supported by: The ARAS Policy and the environmental and social risk methodological manual, it also integrates compliance with international standards. Likewise, the bank’s exclusion list.

Self-assessment summary:

Does the CEO or other C-suite officers have regular oversight over the implementation of the principles through the bank’s governance system?

Yes ☑️  In progress ☒️  No ☐

Does the governance system entail structures to oversee PRB implementation (e.g. incl. impact analysis and target setting, actions to achieve these targets and processes of remedial action in the event targets/milestones are not achieved or unexpected neg. impacts are detected)?

Yes ☑️  In progress ☒️  No ☐

Does your bank have measures in place to promote a culture of sustainability among employees (as described in 5.2)?

Yes ☑️  In progress ☒️  No ☐

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13 Applicable examples of types of policies are: exclusion policies for certain sectors/activities; zero-deforestation policies; zero-tolerance policies; gender-related policies; social due diligence policies; stakeholder engagement policies; whistle-blower policies etc., or any applicable national guidelines related to social risks.
Principio 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.

<table>
<thead>
<tr>
<th>6.1. Assurance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Has this publicly disclosed information on your PRB commitments been assured by an independent assurer?</td>
</tr>
<tr>
<td>Yes ☐</td>
</tr>
</tbody>
</table>

If applicable, please include the link or description of the assurance statement.

Response:

We have had the support of the eco business fund and NINT for the diagnosis and development of an action plan for compliance with the Principles of Responsible Banking

<table>
<thead>
<tr>
<th>6.2. Reporting on other frameworks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Does your bank disclose sustainability information in any of the listed below standards and frameworks?</td>
</tr>
<tr>
<td>☑ GRI</td>
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<tr>
<td>☐ SASB</td>
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<tr>
<td>☐ CDP</td>
</tr>
</tbody>
</table>

Response:

Currently, we are training a multidisciplinary team on the GRI methodology standards in order to soon generate sustainability reports under these standards. Additionally, we carried out our first impact analysis, which we took as the basis for preparing this report and thus being able to establish intelligent goals.

<table>
<thead>
<tr>
<th>6.3. Outlook</th>
</tr>
</thead>
<tbody>
<tr>
<td>What are the next steps your bank will undertake in next 12 month-reporting period (particularly on impact analysis(^4), target setting(^5) and governance structure for implementing the PRB)? Please describe briefly.</td>
</tr>
</tbody>
</table>

Response:

Through technical assistance with the eco business fund, a diagnosis was made, and a work plan was concluded that we will be implementing for the next 4 years, where we will address specific actions on how to advance for each principle.

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\(^4\) For example outlining plans for increasing the scope by including areas that have not yet been covered, or planned steps in terms of portfolio composition, context and performance measurement

\(^5\) For example outlining plans for baseline measurement, developing targets for (more) impact areas, setting interim targets, developing action plans etc.
6.4. Assurance

Here is a short section to find out about challenges your bank is possibly facing regarding the implementation of the Principles for Responsible Banking. Your feedback will be helpful to contextualise the collective progress of PRB signatory banks. What challenges have you prioritized to address when implementing the Principles for Responsible Banking? Please choose what you consider the top three challenges your bank has prioritized to address in the last 12 months.

- Embedding PRB oversight into governance
- Gaining or maintaining momentum in the bank
- Getting started: where to start and what to focus on in the beginning
- Conducting an impact analysis
- Assessing negative environmental and social impacts
- Choosing the right performance measurement methodology/ies
- Setting targets
- Customer engagement
- Stakeholder engagement
- Data availability
- Data quality
- Access to resources
- Reporting
- Assurance
- Prioritizing actions internally
- Other: ...

Creation of an internal awareness and culture that involves the different areas that have a direct impact on the principles. If desired, you can elaborate on challenges and how you are tackling these: