



SUPPORTING THE
TRANSITION
ACROSS FIVE CONTINENTS



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01

Introduction

Bridging the sustainable finance gap in emerging markets



About the Report

Reporting Scope and Period

Bank ABC Group is pleased to present its Group Sustainability Disclosures Report (GSDR) 2024. The report covers the financial year 2024 (1 January to 31 December 2024) and has been prepared with reference to the Global Reporting Initiative (GRI) Standards which focus on transparency and KPI disclosure, Central Bank of Bahrain’s Environmental, Social and Governance (ESG) Disclosure Requirements and Bahrain Bourse ESG Reporting Guide. The reporting scope of the Group Sustainability Disclosures Report (GSDR) is the same as that of the Group’s consolidated financial statements and consists of Bank ABC Group and its fully consolidated subsidiaries. Any scope limitations are specified in the relevant chapters; however, these do not affect the overall understanding of the Group’s activities and their impacts.

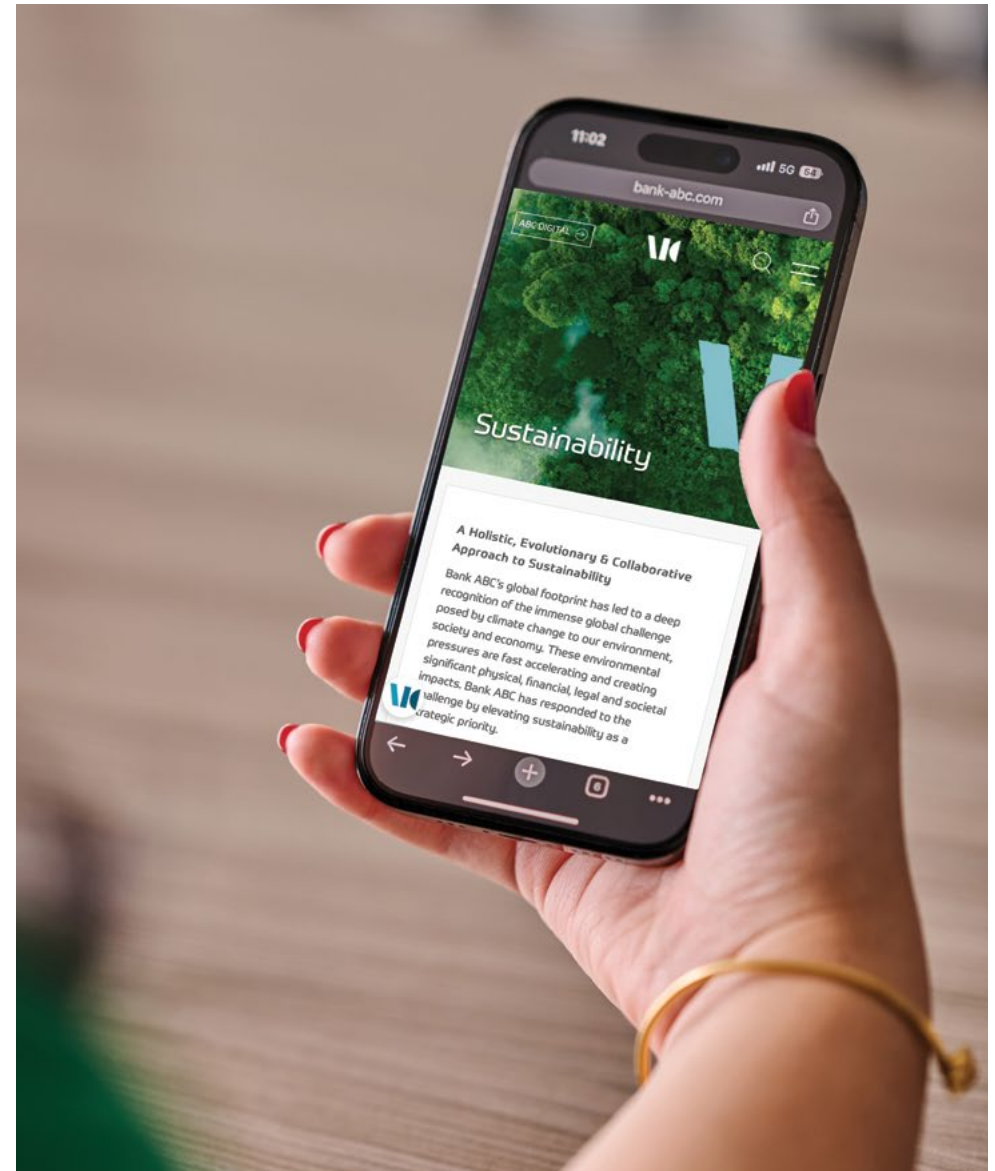
Approach to Sustainability Reporting

The sustainability data in our GSDR provides investors and stakeholders with an understanding of our approach to sustainability. This includes our governance structures, the management of environmental and social risks, the mobilisation of sustainable finance to support our clients’ transition and how we promote sustainable inclusive growth across our markets. The basis of our reporting, outlined in Appendix 2, sets out how we measure our data to ensure reliability and consistency. To ensure greater comparability between 2023 and 2024 data, some 2023 data have been restated from that published in our GSDR 2023. Our approach to sustainability reporting will evolve subject to regulatory requirements and voluntary disclosures across our jurisdictions.

Our disclosures are guided by international standards, frameworks and principles to the extent relevant to our business. We are actively preparing for upcoming reporting requirements across the various jurisdictions in which we operate, including reporting under International Sustainability Standard Board (ISSB)’s IFRS S1 General Requirements of Sustainability-related Financial Disclosures, IFRS S2 Climate-related Disclosures and EU Pillar 3 Disclosures.

Independent Limited Assurance

Ernst & Young - Middle East was appointed to provide independent limited assurance over certain data points within this GSDR, which can be found on pages 70 and 71.





Group CEO's Message

Sael Al Waary
Group Chief Executive Officer



Our Commitment to Sustainability

I am pleased to present Bank ABC's Group Sustainability Disclosures Report for the year 2024. Sustainability is a cornerstone of our strategy, guiding us towards more resilient, inclusive, and responsible growth across our global markets. As MENA's international bank of the future, we recognise our pivotal role in enabling successful energy transition by empowering our clients, employees, and communities to embrace sustainability, while unlocking new opportunities for growth and innovation.

Since publishing our inaugural Group Sustainability Disclosures Report last year, we have continued to make strong progress to reduce our environmental impact and support our clients' transition strategies as well as implementing a three-year programme to reduce the environmental impact of our operations. Our efforts to reduce our environmental impact are beginning to bear fruit with our energy consumption and Scope 1 and 2 GHG emissions both declining by 4% in 2024 compared to 2023. Through enhanced efficiency and resilience, we continue to create long-term value for our shareholders.



Bridging the Global Climate Finance Gap

A key element of our strategy is accelerating the delivery of sustainable and transition finance through proactive client engagement. Bank ABC's expansive global footprint, innovative products, and expertise position us uniquely to partner with our clients to finance the energy transition. Sustainable finance activities encompass green, social, sustainable and sustainability-linked financing while transition finance focuses on supporting high-emitting clients in their decarbonisation journeys. We believe we can generate greater impact by working closely with these clients to support their transitions.

In 2024, we mobilised US\$2.8 billion in sustainable finance, a 24% rise on the amount provided in 2023. This equates to 15% of our outstanding loans and advances as of year-end 2024. Most notable, is the Bank's ability to mobilise capital and close the climate funding gap across emerging markets. In 2024, almost 90% of our sustainable finance was directed towards emerging markets, a similar level to the previous year. This high percentage is in sharp contrast to global trends where the bulk of green finance remains concentrated in the developed world. Bank ABC's high allocation of sustainable finance to the emerging markets is driven by our ability to leverage our unique geographical footprint across the GCC, North Africa, Türkiye, Brazil and Southeast Asia.

Strengthening our Capability

Recognising that financial capital alone is not enough, we continue to strengthen our internal capabilities and empower our employees to champion sustainability in every aspect of their lives. Over the last year, we launched a global sustainability training programme with our client-facing teams to build capacity and awareness on these topics, ahead of rolling-out several new initiatives, including the incorporation of a Client ESG Risk Assessment into our lending process. These new processes should provide valuable insights, deepen client relationships and accelerate the deployment of sustainable and transition finance solutions.

To support these initiatives, we expanded our team of sustainability specialists across the Bank's global network. We now have sixteen dedicated sustainability experts across strategic locations: Bahrain, Brazil, Egypt, Tunisia, Paris, and London. This expansion underscores our commitment to incorporate sustainability across our geographies to capture the full value of our sustainability strategy.

Global Impact

Bank ABC also plays a wider role in supporting the transition, not just the provision of finance, by working with our clients, communities and other organisations to unlock innovative solutions. We are actively engaged with policymakers and regulators across our jurisdictions to pre-empt the dynamic regulatory landscape, to support and shape these evolving frameworks and ensure we stay ahead of stringent requirements. Despite Europe's move to roll back some of its corporate sustainability disclosure requirements, its ESG regulatory requirements remain amongst the most stringent. At the same time, the International Financial Reporting Standards (IFRS) S1 and S2 are being increasingly adopted as the global standard for corporate sustainability disclosures. Across our countries of presence, policymakers in Brazil, Türkiye and Jordan have already adopted IFRS, with the UK and Singapore reviewing it for likely adoption.

Looking Forward

As we advance into 2025, we are not only committed to driving meaningful change and reducing our environmental impact but also unlocking new opportunities for value-creation. By the end of 2025, we expect to realise tangible benefits from our reduced operational environmental impact. In parallel, we are finalizing calculations and will commence mitigation planning for our Scope 3 financed emissions, thereby affirming our role as a Partnership for Carbon Accounting Financials (PCAF) signatory.

Our sustainability achievements across 2023 and 2024 have created a solid foundation for the transformative journey ahead. We recognise that the transition to a sustainable economy requires collective action, and by working closely with our clients, policymakers and communities, we will continue to channel capital where it is needed most, shaping a more sustainable and inclusive future.

I am confident that our strategic sustainability focus will not only enhance stakeholder value but will also make a meaningful difference to the planet and our communities. I would like to extend my sincere gratitude to all stakeholders for their unwavering support and commitment to our sustainability mission.



Click on the image or scan the QR code to watch Group CEO, Sael Al Waary's message on Bank ABC's commitment to sustainability.





CSO's Message

Ian McCallum
Chief Sustainability Officer



Unlocking Value through Collaboration and Partnerships

As we mark the half-way point of our 3-year (2023-26) sustainability roadmap, we remain steadfast in incorporating sustainability across our value chain and translating strategic objectives into credible action and measurable impact.

Our journey to date has focused on building a strong foundation from which to scale our ability to support our customers in their sustainability journey. We have established a robust baseline of material ESG KPIs and developed key initiatives, most notably within our client-facing teams, to drive tangible improvements. These are now being rolled out across the Group and will provide a solid foundation for data-driven decision making, enabling us to further refine our long-term approach and amplify positive impact.



At the heart of our progress lies our commitment to collaboration. Delivering our long-term sustainability objectives requires strategic partnerships that extend well beyond our immediate operations, fostering alignment across our entire value chain. Our engagement spans across a wide range of stakeholders including clients, regulators, investors, industry peers, employees and the wider communities in which we operate.

In 2024, we sharpened our focus on building high-impact relationships that could drive genuine solutions to some of our most pressing environmental challenges. These efforts will accelerate in 2025, as we emphasise client-focused initiatives that enhance our provision of sustainable and transition finance.

Driving Partnerships and Innovation

A critical area of focus for the Bank is accelerating sustainable finance through strategic partnerships. We recognise the importance of multi-lateral development banks in mobilising capital for emerging markets, as their patient, purpose-driven investment, aligns with our commitment to financing real economic transformation. The publication of our Sustainable Finance Framework provides a robust plan/blueprint from which to expand these collaborations and drive sustainable finance forward.

We are also accelerating our innovative client solutions to better serve our customers. A notable example is the launch of a Carbon Credit Solutions Desk in Banco ABC Brasil, our Brazilian subsidiary. Thanks to this initiative, we teamed up with a specialist that develops and protects over two million hectares of the Amazon Rainforest by directing investment via carbon credits to fund sustainable forest development projects. This solution allows our Brazilian clients to purchase nature-based voluntary carbon credits, helping them complement the decarbonisation solutions already utilised across their value chain and neutralise residual emissions.

Collaborating Across Operations

Beyond financing, we also recognise the importance of reducing the environmental impact of our own operations and addressing the emissions throughout our supply chain. To advance this goal, we partnered with a specialist engineering consultant to conduct a comprehensive four-month review of our global operations. This assessment identified opportunities to reduce our energy consumption, water usage and GHG emissions.

The findings have shaped the basis of our three-year plan, which was launched in early 2025 to drive meaningful reductions across our operations.

Equally important is tackling the GHG emissions within our supply chain, which generated 44% of our total Scope 1, 2 & 3 GHG emissions in 2024 (excluding financed emissions). To this end, we are reviewing our supplier engagement strategy with the support of an external vendor management specialist. This initiative aims to provide better understanding of our supply chain, foster closer vendor engagement and reduce the environmental impact of our suppliers.

Embedding Sustainability into our Culture

True transformation requires more than strategy — it requires a cultural shift. Our long-term success hinges on embedding sustainability into the DNA of our organisation, ingraining it in our daily work through training, awareness programmes, and sustainability-focused initiatives. Fostering a culture of innovation where sustainable ideas and collaboration are encouraged will be key to developing impactful solutions.

While embedding sustainability into existing roles can be empowering, it comes with its own challenges. To address these, we have adopted a structured approach built on five key principles:

1. **Transparency of Actions:** We strive to deploy clear, data-driven initiatives with measurable outcomes, ensuring progress is visible, verifiable, and continuous.
2. **Embedding Sustainability:** Our initiatives are focused on embedding sustainability into existing workflows with clear objectives to optimise and not complicate daily workflows.
3. **Stakeholder Buy-in:** We link sustainability initiatives to profitability, or risk mitigation, to align with our overall business objectives.
4. **Fostering Inclusion:** Engaging with teams early on in the process to co-create solutions that deliver tangible benefits, be it cost savings, enhanced revenue, improved operational efficiency or job satisfaction.
5. **Scale Implementation:** We take a phased approach, starting with pilot programmes to test feasibility and leveraging small-scale successes to build confidence and expand implementation.

Looking Ahead

As we continue our sustainability journey, collaboration and innovation will remain the key drivers of our strategy. By working together with our partners, clients and employees, we can unlock the full value of our sustainability strategy and make a meaningful impact.



Mobilising Capital for the Developing World



Almost

90%

of our

US\$2.8bn

sustainable finance portfolio was directed towards the emerging markets.

A Bank of the Future committed to a better future

Bank ABC Group is MENA's leading international bank, dedicated to driving growth and making a positive impact through robust sustainability efforts. Founded in 1980 and headquartered in Manama, Bahrain, we operate across 15 countries and actively engage in 25 markets across five continents. With a diverse workforce of over 5,000 skilled professionals, we are committed to fostering an ethical and progressive banking culture that has client centricity, digital innovation and sustainability at the heart of its operations.

At Bank ABC, sustainability is not just a strategic priority; it's integral to our identity. Our innovative financing solutions across wholesale and retail banking in conventional and Shariá-compliant formats, also cover sustainability-linked financing, designed to support clients on their decarbonisation journeys while promoting responsible growth. The Bank launched its sustainability strategy in 2023 and since then has mobilised an impressive volume of sustainable finance, almost 90% of which was channelled to emerging markets, underscoring our commitment to bridging the global climate finance gap.

Our commitment to financial excellence and responsible development extends across our various jurisdictions, including MENA, Europe, Türkiye, North America, Brazil, and Southeast Asia. By engaging with local stakeholders, we ensure that our efforts resonate with the unique challenges and opportunities in each market.

Our growing team of sustainability specialists, now expanded across our global network, is dedicated to driving these initiatives forward. As we look ahead, Bank ABC remains committed to fostering collaboration and innovation in our markets of presence and beyond. Together with our clients, policymakers, and communities, we are shaping a more resilient and inclusive future, redefining the banking landscape in the MENA region for generations to come.



Empowering Sustainable Development Across Borders

Established in **1980**

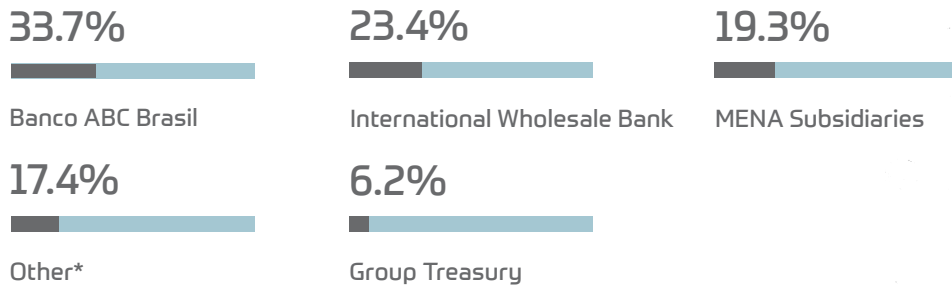
Incorporated in the Kingdom of Bahrain as Arab Banking Corporation B.S.C.

Headquarters in Manama, Kingdom of Bahrain

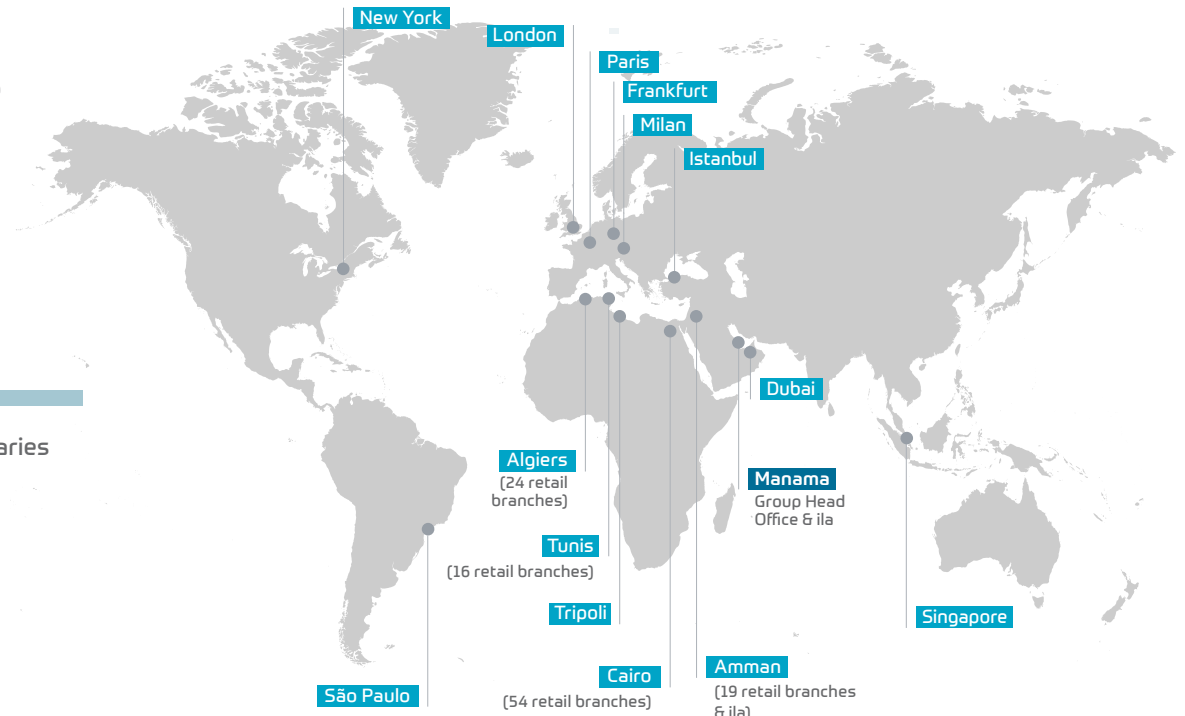
Employee Size **5000+**

Serving 25 markets with a presence in 15 countries across five continents, with one team committed to our clients' success.

In 2024 the annual accounts showed the following Total Operating Income (TOI) split by geography:



*Includes activities of digital units (Arab Financial Services, ila) and Equity income.



Consistent Recognition for Continued Excellence

Bank ABC has reinforced its position as an international banking powerhouse, towering over the MENA banking landscape and beyond. The Bank has been recognised extensively for path-breaking innovation, product enhancements, prudence and performance in a challenging

environment and leading landmark deals. **With 28 distinguished awards won in 2024, Bank ABC sets another record in excellence.**



2024 Highlights

Environment

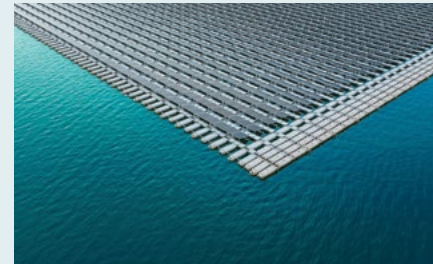
4%
decline in absolute Scope 1
and 2 GHG emissions
vs 2023*

4%
decline in energy
consumption vs 2023*

29%
decline in water
consumption vs 2023

7%
decline in paper
consumption vs 2023

49%
of paper recycled, a
doubling from 24%
in 2023



16%
of energy consumption
sourced from renewable
energy

Launched 3-year (2025-27)
environmental impact
reduction plan of our
operations

Fit for Purpose

US\$2.8bn
of sustainable finance,
up 24% YoY

86%
of the Group's sustainable
finance mobilised to
emerging markets

*Location-based reporting.

Acted as Joint Lead Manager in arranging **US\$2.1bn** of green, social and sustainable sukuk^{**}



16 sustainability specialists across our global network, up from 8 in 2023

Received third-party accreditation of our Sustainable Finance Framework

Developed a Client ESG Risk Assessment process

Over 40 training sessions for client-facing teams

Source of Value Creation

Set up Carbon Credit Solutions Desk in Banco ABC Brasil

36 training hours per FTE in 2024, up 33% YoY^{***}

US\$1.3mn of CSR investments



103 CSR projects across our communities

^{**} Sukuk are Sharia-compliant bonds that represent a portion of ownership in an underlying asset.

^{***}FTE - Full Time Employees.

02

Bank ABC's

Sustainability Strategy

A comprehensive
roadmap towards
sustainability

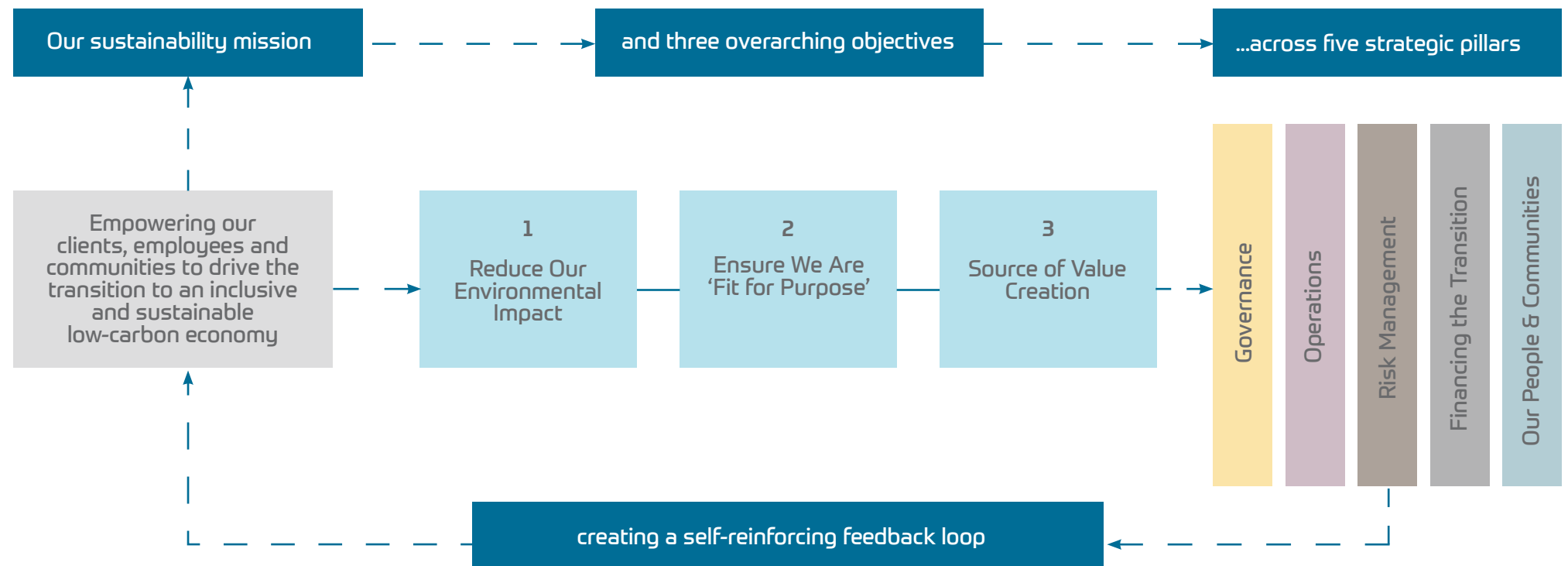


Sustainability Strategy Overview

Sustainability Unlocks Value and Builds Resilience

Our sustainability strategy is defined by a clear mission to empower our clients, employees and communities to drive the transition to an inclusive and sustainable low-carbon economy. In full alignment with the Group's overall business strategy, it focuses on reducing our environmental impact whilst unlocking value creation through cost reductions, risk mitigation,

and revenue opportunities. Its incorporation throughout our value chain combined with innovative client solutions and our unique global footprint positions us to play a pivotal role creating lasting and meaningful change.



Sustainability Objectives

Bank ABC is committed to embedding sustainability practices that creates value for both our stakeholders and the planet. We will achieve this through the successful implementation of our sustainability strategy's three overarching objectives:

1. Reduce our Environmental Impact

Bank ABC is dedicated to reducing the environmental footprint of our operations, suppliers, and the financing we provide to our clients. This is a major focal point of our current and future sustainability initiatives.

Initiatives

Environmental Reduction Plan of Operations

We started with a 4-month project to evaluate the environmental footprint of our operations and develop a plan to reduce energy, water and GHG emissions.

Measure and Plan




We launched a 3-year plan to reduce the energy consumption, water usage and GHG emissions of our major operations, covering Bahrain, London, Egypt, Jordan, Tunisia and Algeria. In 2024, these operations comprised 88% of our Group's energy usage, 92% of water consumption and 93% of the GHG emissions generated by our energy and water consumption.

Implement

The first phase has already begun and is focused on our Bahrain, London and Egypt operations. These three operations contributed 64% of the Group's energy use, 75% of our water consumption and 63% of energy and water related emissions. The second phase, beginning in 2026, will capture the remaining three operations of Jordan, Tunisia and Algeria. We expect to start realising the benefits from reduced energy, water and GHG emissions in late 2025.



Benefits

- 
 - Reduce the GHG emissions, energy consumption and water usage of our operations.
- 
 - Increase resilience by reducing exposure to energy and water.
- 
 - Generate annual cost saving of 9% in the Group's energy and water spend.

2. Ensure we are 'Fit for Purpose'

Our clients face increasing environmental and social pressures from regulations, legal requirements, technological innovations, market demand, and physical risks. These pressures will only intensify as global temperatures rise and the impact from climate change escalates.

To support our clients through this necessary structural shift, we are accelerating our efforts to strengthen our capabilities, driving product innovation and deepening collaboration. By doing so, we can support our clients in mitigating risks and capturing opportunities.



Initiatives

Client ESG Risk Assessment Methodology

Developed by a cross-function working group, the bottom-up methodology aims to enhance our ability to support our clients by deepening our understanding of their environmental and social risks and their mitigation plans. The approach involves the completion of a client ESG questionnaire by the relationship manager and is applicable to all companies operating in High and Very High environmentally risky industries.

Proprietary Industry Environmental Risk Rating approach

Developed in parallel with our Client ESG Risk Assessment process, it ranks forty-three sectors according to their environmental risk: Very High, High, Moderate and Low. The approach allows for a top-down evaluation of environmental risk at the portfolio level. It also provides valuable information on the environmental and social risks facing each industry and how companies are mitigating those risks.

Feedback and Implementation

Several pilot tests were performed to capture valuable feedback and refine the approach. Ahead of the launch, we also rolled out a global training programme to upskill our client-facing teams. The new processes have now been implemented globally, allowing client ESG risk to be incorporated into the credit approval process and client engagement.

Benefits



- Incorporates client ESG risk into the credit approval process.
- Deepens understanding of our client's environmental and social risks and their plans to mitigate.



- Enhance our ability to support our clients.
- Strengthen our client relationship banking model.



- Identify sustainable and transition finance opportunities.

3. Source of Value Creation

Climate risk and financial risk are closely interrelated. Reducing consumption of increasingly scarce resources should lead to greater efficiency while supporting the planet. Our action plans have been deliberately structured to capture the real economic benefits from greater efficiency, innovation and revenues.



Initiatives

Carbon Credit Solutions Desk

Launched in Brazil by teaming up with a local partner to develop and protect over 2m hectares of the Amazon Rainforest. The initiative directs investment via carbon credits to fund sustainable forest development projects.

Help Neutralise Emissions

This solution allows our Brazilian clients to purchase nature-based voluntary carbon credits to neutralise their residual emissions and complement the decarbonisation solutions already utilised across their value chain.

Building on our Success

In September 2024, we facilitated a transaction to offset carbon emissions generated by a client's truck fleet. The carbon credits were sourced from a project based in the Amazon Rainforest, comprising of more than 27,000 hectares of native forest.

Benefits



- Allow clients to offset the carbon emissions of financed projects and neutralise their residual emissions.



- Direct investment via carbon credits to fund sustainable forest development projects in the Amazon Rainforest.



- Generates fee-based revenue.

Our Sustainability Roadmap

Since its launch in 2023, we have reached the halfway mark of our three-year roadmap to embed sustainability across the Bank's value chain. The progress made so far has laid a strong foundation to accelerate our efforts through 2025 and beyond.

Achievements in 2024

Our sustainability efforts in 2024 were very much focused on developing our comprehensive environmental action plan with targeted initiatives and processes aimed at reducing the impact of our operations and financing activities. Launched recently, the plan to reduce the environmental impact of our operations is being implemented and tangible benefits are expected to begin materialising in the second half of 2025.

Another key focal point was addressing the environmental impact of the financing provided to clients. To do so, we finalised our Client ESG Risk Assessment methodology helping us to incorporate client ESG risk into our lending process. We also developed an Industry Environmental Risk Rating approach that allows us to evaluate environmental risk at the portfolio level. These new initiatives enable us to better support our clients in their decarbonisation journey thanks to a deeper understanding of their environmental and social risks, their mitigations plans and therefore, their growth opportunities. Strengthening our capability will be a critical enabler to successfully implementing these new processes and frameworks. With this in mind, we also launched a global training programme to enhance our business teams' capability and client engagement. These initiatives align with our simplified approach to embed sustainability into existing workflows and look to scale by building in-house capability.

Looking Forward 2025-2026

Having laid a strong foundation, we plan to accelerate our efforts in 2025-26 to reduce the environmental impact of our financing and scale the amount of sustainable and transition finance that we mobilise. These initiatives are spread across our five strategic pillars:

Governance

Effective governance is a key driver of any successful sustainability strategy and typically the lead indicator of senior management's commitment to measure, manage and mitigate its environmental and social impact. We have already incorporated sustainability into the governance structure at Group level and set up a Sustainability Steering Committee to oversee the progress of the strategy. Additionally, the Group ESG Risk Standard has recently defined how ESG risk is managed under the Bank's risk management framework.

We are further strengthening our governance structure by setting up the Sustainable Finance Forum, which will report directly to the Sustainability Steering Committee. The Forum will meet quarterly and provides oversight of the Sustainable Finance Framework (SFF), including sustainable finance products, the management and verification of sustainable assets and liabilities and the review of the annual sustainable finance.

Operations

With our three-year environmental reduction programme for our operations already under way, a future area of focus is measuring and managing the environmental impact of our suppliers. To face this challenge we are evaluating the benefits of implementing a group-wide procurement system. This initiative aims to enhance our analysis and understanding of our supply chain, foster closer engagement, facilitate vendor ESG assessments and ultimately minimise the environmental impact of our suppliers.

Financing the Transition

There are five closely related initiatives that together will provide us with a valuable platform to support our clients' transition strategies and, in turn, help us manage and mitigate our Scope 3 financed emissions. The first three initiatives will also greatly deepen our understanding of environmental risk at the client and portfolio level.

- Our Client ESG Risk Assessment to evaluate our clients' ESG risk and incorporate it into our credit approval process.
- Our Industry Environmental Risk Rating methodology to evaluate environmental risk at the portfolio level.
- The measurement of our Scope 3 financed emissions to establish a reliable baseline and evaluate an approach to mitigate.
- The launch of a sustainable finance product development programme.
- A training and support programme to strengthen our business teams' capability and client engagement.

Our People & Communities

The social agenda of our sustainability strategy is a critical pillar. We consider our employees as our most valuable asset and we are constantly working to deliver more learning and development programmes to allow employees to build rewarding careers within Bank ABC. At the same time, we recognise the vital role the Bank plays in developing and supporting its communities. To this end, we established a dedicated working group to develop a clear action plan focussed on strengthening our approach to D, E&I. In parallel, we will undertake a review of our Corporate Social Responsibility (CSR) strategy to ensure the investments we make in our communities deliver on our objectives and generate meaningful, measurable impact.

Bank ABC's Sustainability Journey

2023

Launched 3-year roadmap of action plans to embed sustainability across Bank ABC Group

Developed Sustainable Finance Framework

8 Sustainability specialists headcount across the Group with focus in Brazil and Bahrain

Group Sustainability Strategy approved by Group Board

2024

Sustainability Steering Committee to oversee progress

Launched global sustainability training programme for Wholesale and Credit teams

11 Sustainability specialists headcount across the Group

Measured ESG KPIs of Group and all Units for 2023

Published our inaugural Group Sustainability Disclosures Report 2023

To be delivered by YE 2026:

- Set up Sustainable Finance Forum.
- Measure Scope 3 financed emissions and evaluate our approach to mitigate.
- Sustainable finance product development.
- Develop a GHG emissions reduction plan for suppliers.
- Develop an action plan to further enhance our approach to D, E&I.
- Strengthen our approach to CSR investments.
- Develop ESG targets and explore linking to remuneration.

Launched global roll-out of:

1. Client ESG Risk Assessment into credit approval process.
2. Sustainable Finance classification process.
3. Industry Environmental Risk Rating methodology.

16 Sustainability specialists headcount across the Group

**H1
2025**

Launched 3-yr environmental reduction plan of operations

Developed Group ESG Risk Standard

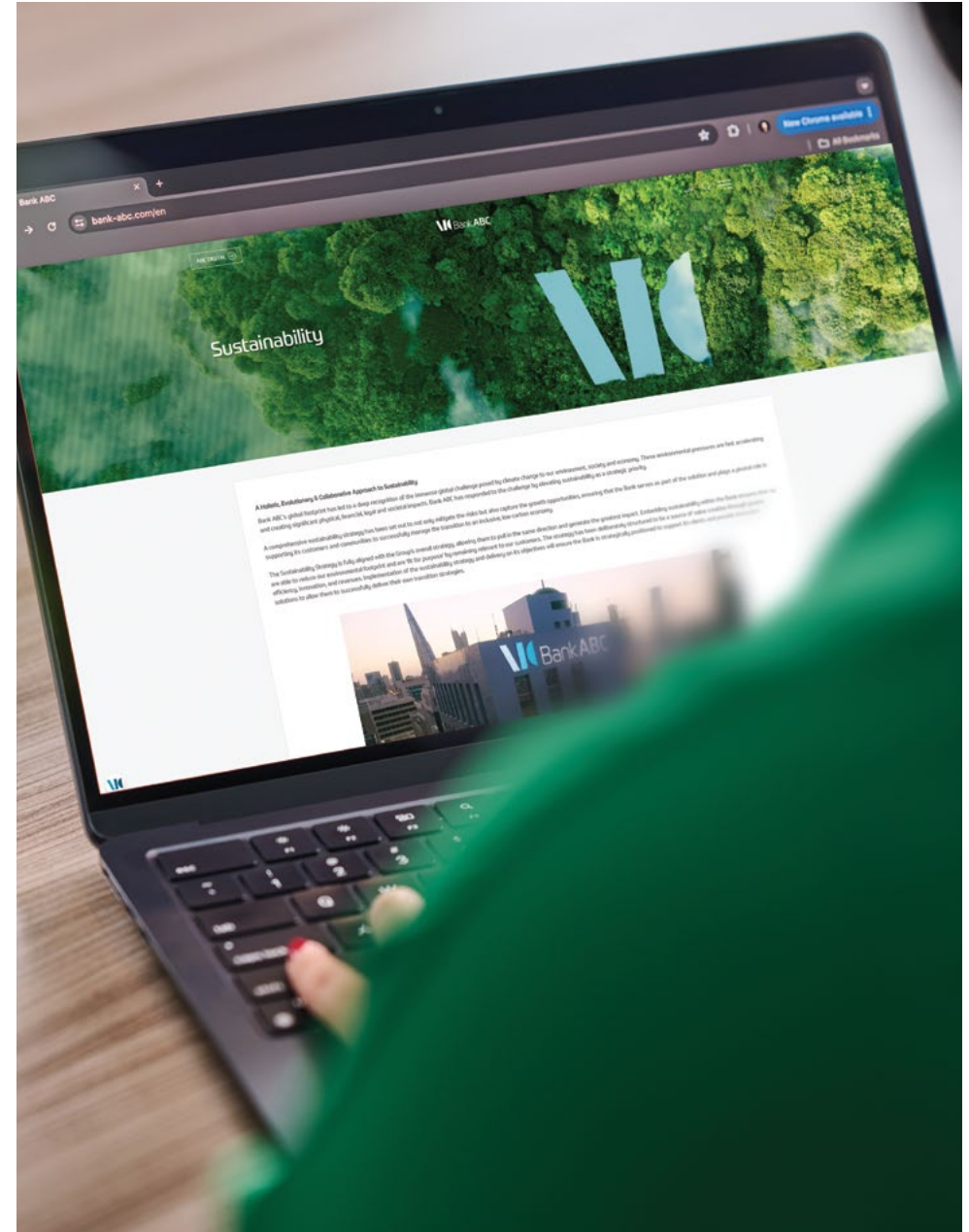
Publish GSDR 2024

2026

Beyond 2026

The north star of our sustainability strategy is clearly defined by our mission statement and the three overarching objectives that will guide and set our direction of travel beyond 2026. Our strategy will continue to focus on reducing the environmental impact of our operations, suppliers and financing, ensure we are 'fit for purpose' to support our clients' transition strategies and generate positive value for our stakeholders.

Future action plans will be strongly informed by the data and insights gathered through current initiatives, allowing us to continuously refine our frameworks, processes, resources and capabilities. Technological developments are likely to be a powerful enabler driving innovation in client solutions and improving operational efficiency. Capturing the maximum long-term value will entail ingraining sustainability into the DNA of the organisation and into everyday decision-making so that it becomes business as usual. At the same time, we recognise that lasting success will require collective action achieved through close collaboration with our clients, policymakers and communities. This collaborative approach will help us to direct capital where it is most needed, and shape a more sustainable, inclusive future.



03

Bank ABC's

Sustainability Performance

From ambition to
action - gaining
momentum on our
sustainability journey.



3.1: Governance



“We recognise that our commitment to ESG is not just about regulatory compliance but about leading with integrity and responsibility. Bank ABC’s robust ESG governance framework ensures that we hold ourselves accountable and continuously strive for excellence in our pursuit of enabling a more sustainable future.”

Maadian Botha
Group Chief Compliance Officer

Our Approach

At Bank ABC we are committed to the highest standards of accountability and transparency as we continue to advance our sustainability agenda. Working alongside our regulators, we strive to uphold the safety and integrity of the financial system whilst recognising our contribution to healthy and sustainable societies. Our approach to ESG governance continues to develop in alignment with evolving stakeholder expectations and best practices.

To enable effective oversight and timely decision-making we have incorporated sustainability into our governance structure. Indeed, the ultimate responsibility for overseeing the Group Sustainability Strategy lies with the Group’s Board of Directors. A dedicated Sustainability Steering Committee, chaired by the Group Chief Executive, oversees the implementation and progress of the Group Sustainability Strategy and reports directly to the Group Risk Committee. An important recent milestone has been the introduction of our Group ESG Risk Standard, which defines how ESG risk is incorporated across the Bank’s risk management framework and how our three lines of defence model is firmly applied, setting out clear roles and responsibilities. This ensures robust oversight and control of material ESG risks across the Bank.

Bank ABC is committed to maintaining the highest standards of ethical and professional conduct, including complying with all applicable rules and regulations. The Group Chief Compliance Officer (GCCO), together with the Heads of Compliance and Money Laundering Reporting Officers Group-wide, support the Board and Senior Management in effectively managing the compliance risks faced by the Bank. There is no known material non-compliance

with the applicable regulatory requirements, whilst there are continuous improvement measures across the group.

Business Conduct

Bank ABC is committed to “doing the right thing” by maintaining the highest standards of ethical and professional conduct and integrity to protect its brand. This is reflected in our culture, behaviour and tone from the top. As a global bank with an extensive network, we do not rely solely on external expectations or regulatory obligations to define our conduct. Rather, we set and uphold our own standards - deliberately high, organisation-wide, and rooted in our shared responsibility to act with integrity and purpose. These are formalised in our Group Conduct Standard and Code of Conduct.

Bank ABC’s Group Conduct Standard defines high-level principles and sets the minimum requirements to be followed by all Group Businesses, Support Functions and Units. This document focuses on key areas / activities which intrinsically carry Conduct Risk. Head Office employees sign off their compliance with the Code of Conduct, inclusive of AML / CFT Policy, with over 99.80 percent completion rate.

Our Code of Conduct and supporting policies, standards, and procedures set out the minimum standards that are expected across the Group from our employees, directors, senior management and contract and temporary workers. It articulates the behaviours

GOVERNANCE STRUCTURE

Board of Directors

The Board has the ultimate responsibility for overseeing the implementation of the sustainability strategy.

^ Board Risk Committee

Provides oversight of ESG risks and risk appetite on behalf of the Board.

^ Group Risk Committee

Highest management level overseeing the incorporation of ESG risk into the risk management system and overall risk appetite.

^ Sustainability Steering Committee

Review and monitor implementation of the sustainability strategy. Report to the Sustainability Finance Forum.

^ Sustainable Finance Forum*

Oversight of the Sustainable Finance Framework and how sustainable assets and liabilities are managed and verified.

* To be implemented in H2 2025.

REPORTING LINES

Group CEO

Implements the sustainability strategy, framework and policies based on Board approvals.

^ Chief Sustainability Officer

The CSO leads the Group Sustainability team, the sustainability strategy and implementation of the related framework, policies and practices.

^ Group Sustainability Team

Develop, amend and implement the sustainability strategy, frameworks, policies and initiatives to embed sustainability across all Group Function and Units.

FUNCTIONAL ROLES

Business Functions

Group Sustainability

Internal Audit

Support Functions

Group Risk

1st Line of Defence

Comply with sustainability strategies, frameworks and policies; conduct ESG risk assessments and identify new risks.

2nd Line of Defence

Develop, amend and implement the sustainability strategy, frameworks and policies. Provide oversight that 1st LOD is compliant.

3rd Line of Defence

Provide independent review to ensure compliance with sustainability frameworks, policies and procedures.

required of all employees and serves as a guiding framework for how we conduct ourselves — across all functions, geographies, and levels of the organisation — in our interactions with customers, colleagues, investors, regulators, and the communities we serve. Upholding the Code of Conduct is essential to safeguarding the Bank’s reputation, reinforcing a culture of professionalism, and enabling the sustained delivery of our strategic objectives across our global network.

Whistleblowing

We are committed to maintaining the highest standards of ethical and professional behaviour across all the bank’s operations and locations. Our reputation and organisational integrity are fundamental to our success as bank and a regulatory compliant business.

A culture of openness and accountability is essential to encourage individuals to raise genuine concerns of wrongdoing early on. As part of this commitment, the Bank has developed a detailed Group Whistleblowing Policy, which includes a whistleblowing hotline. The policy aims to:

1. Guard against internal misconduct and fraud.
2. Provide a confidential and transparent process for raising concerns.
3. Ensure concerns can be raised without fear of suffering retribution.

Conflicts of Interest

The Bank has clear policies governing conflicts of interest at both the Board and employee levels. Our Corporate Governance Charter outlines a comprehensive framework for overseeing and managing any such conflicts of interest. All directors and CBB-approved persons must declare any actual or potential conflicts and disclose all external interests annually. In case of any conflicts, abstentions from related votes are recorded and disclosed in the Group Annual Report. At the employee level, our Conflicts Management Standard and Conflict Procedure Clearance ensure that decisions are made solely in the best interest of the Bank and its customers.

Ethics & Anti-corruption

Bank ABC’s Anti-Bribery and Corruption (ABAC) Standard is applicable to all employees and third parties engaged with the Bank. Its objective is to ensure:

- All employees of Bank ABC understand the ABAC principles, the responsibilities and obligations placed on Bank ABC to comply with relevant Bribery and Corruption laws and/or regulations.
- Bank ABC’s reputation is protected by taking all reasonable measures to prevent the Bank’s involvement in bribery and corruption.

- A culture of integrity, transparency and compliance is established and maintained to actively seek to prevent bribery and corruption; and detect, monitor, report and respond appropriately to any incidences of bribery and corruption which may occur.
- Business is conducted with integrity and transparency in compliance with applicable laws, and in accordance with the values and Code of Conduct established by Bank ABC.
- Any suspicion or instance of bribery and corruption is reported and investigated, and where appropriate, information and assistance are provided to the relevant external authorities.

We are committed to satisfying the requirements of these standards and the supporting Group Financial Crime Compliance Policy, and to continuously improve the approach towards mitigating bribery and corruption risk.

Our Progress

We have made significant strides in aligning our Sustainability Governance with global best practices. We have set out a comprehensive Group ESG Risk Standard to incorporate ESG risk into the Bank’s overall risk management framework. The Standard gives reference to the regulatory expectations across all jurisdictions within our network, including but not limited to expectations from the Central Bank of Bahrain (CBB), Prudential Regulatory Authority of the UK, Monetary Authority Singapore (MAS), Central Bank of Jordan (CBJ) and the European Central Bank (ECB). Monetary Authority Singapore (MAS). It also drew upon other crucial sources such as the Basel Committee on Banking Supervision. It sets out clear roles and responsibilities across functions and entities. This allows us to embed ESG Risk, as a

“Level 1” principal risk, into the Bank’s risk pillars and taxonomy, and traditional risk categories such as credit risk, operational risk and liquidity risk. A detailed gap analysis and targeted action plan accompany the Standard to close the identified gaps and ensure ESG risk is effectively measured, managed and reported across all subsidiaries and branches.

Following the incorporation of sustainability into our governance structure at Group level, we have expanded our focus to ensure it is embedded into the governance structures throughout the Group. A key element in this process is the timely reporting of our material ESG KPIs across the Group, which enables management to effectively monitor, manage and report on progress. We have also boosted our dedicated sustainability resources. Since launching the sustainability strategy in mid-2023, we have significantly expanded the Sustainability team to sixteen specialists across Bahrain, Brazil, Egypt, Tunisia, London and Paris to support local implementation and meet the growing regulatory requirements.

Next Steps

In 2025, a key priority will be executing the action plan to ensure full deployment of the Group ESG Risk Standard across all subsidiaries and branches. We will also formally establish the Sustainable Finance Forum in 2025 to support the scaling of sustainable and transition finance across the Group.

A significant future milestone will be the development of targets focused on reducing the Bank’s environmental footprint and increasing our sustainable finance activity. In parallel, we will explore linking these targets to management remuneration.

Initiative	Description	Benefit
Group ESG Risk Standard	<ul style="list-style-type: none"> • Defines how we incorporate ESG risk across our risk management system. • Sets out the roles and responsibilities across our Group Function and geographical entities for managing ESG risks. 	<ul style="list-style-type: none"> • Provides a robust Group-wide framework to ensure that ESG risks are effectively measured, managed and reported. • Ensures sustainability is incorporated into the governance structure at Group and entity level.
Set up our Sustainable Finance Forum	<ul style="list-style-type: none"> • Established to provide quarterly oversight of our Sustainable Finance Framework (SFF) and ensure rigorous governance of sustainable finance and reporting. 	<ul style="list-style-type: none"> • Strengthen governance and supports the delivery of our sustainable and transition finance strategy. • Mitigates greenwashing.
Develop ESG targets and explore linking to remuneration.	<ul style="list-style-type: none"> • Develop action plans to improve material ESG KPIs and develop timebound targets. • Explore linking ESG targets to senior management variable remuneration. 	<ul style="list-style-type: none"> • Ensure alignment and drive accountability.

3.2: Operations



“Taking a holistic view of our operations, we are committed to minimising the environmental impact of our daily activities, with a comprehensive 3-year reduction plan. We’ve also made cybersecurity and business continuity top priorities, to boost resilience. A future area of focus for us will be measuring and managing the environmental impact of our suppliers. We look forward to enhancing our understanding of our supply chain, facilitate vendor ESG assessments and minimise the environmental impact of our suppliers.”

Ismail Mokhtar
Group Chief Operating Officer

Our Approach

At Bank ABC, we take a holistic view of our operations, aiming to minimise environmental impact of our day-to-day activities across carbon emissions, energy and water consumption and waste management, while enhancing organisational resilience. We also prioritise cybersecurity and business continuity as integral components of our operational strategy-critical not only to the resilience of our infrastructure, but also to maintaining the trust of our stakeholders and protecting our clients, employees, and systems.

Environment

With this focus set, we have adopted a comprehensive approach to reduce the environmental impact of our operations across our material topics. A critical first step has been to measure the direct and indirect impacts of our operations, leading to the development and implementation of a 3-year environmental impact reduction plan. Building on this groundwork, we launched several initiatives linked to the plan. These include an important collaboration with the Kingdom of Bahrain’s electricity and water utility, EWA, to support their programme to reduce the country’s electricity consumption.

To strengthen these efforts, we are continuously working to improve the scope and quality of our environmental data, particularly in relation to supplier emissions as well as working on better data capture across our units.

Going beyond our direct operational boundaries, we recognise the critical role that upstream supply chain emissions play in our overall footprint. As is typical across the banking and service sectors, the majority of our emissions fall under Scope 3, particularly from supply-related activities. With 44% of our Scope 1, 2 and 3 emissions, excluding Scope 3 financed emissions, originating from our suppliers, more targeted engagement, strategic partnerships, and cross-sector collaboration will be essential to driving systemic change and advancing our broader decarbonisation efforts.

Cybersecurity

Bank ABC’s Cyber Security framework is aligned with international standards and best practice and is subject to continuous refinement through process improvement and maturity assessments. It aims to consolidate and reinforce the resilience of the Group’s operations against internal and external cyber security threats, support digital transformation and enable safe adoption of AI and other emerging technologies. The Framework comprises our Cyber Strategy, Group Information Security Policy, supporting standards, procedures, processes, tools and staff training. Together, these safeguard the Bank’s ability to detect, respond to, contain and recover from cyber-attacks, while ensuring compliance with legal, regulatory and industry requirements, including SWIFT CSP and PCI-DSS.

Data Protection

At Bank ABC, our Data Protection Policy underscores our commitment to safeguarding our clients' and employees' personal data in accordance with Bahrain Personal Data Protection Law (PDPL) and other relevant data protection laws. We collect personal data only for legitimate purposes, respect individuals' rights, transparently communicate our data processing activities through our Privacy Notices and incorporate data protection principles through data protection by design and default. Our compliance efforts are overseen globally by a dedicated Group Data Protection Officer, supported by Local Data Protection Officers in each Unit across the Group. Regular gap assessments, audits, and continuous policy updates reflect evolving regulatory requirements and best practices further strengthening our commitment to data protection and fostering trust both internally and externally with our clients and regulators.

Bank ABC Group's Environmental KPIs of Operations

Environmental KPIs	2023	2024	Change (YoY)
Scope 1, 2 & 3 (t CO ₂ e) – location based	43,476	43,345	-0.3%
Scope 1, 2 & 3 per FTE ¹ – location based	8.9	8.7	-2.8%
Energy usage (kWh)	25,040,039	24,067,724	-3.9%
Energy usage per FTE	5,132	4,810	-6.3%
% of energy from renewable sources	17.1%	15.9%	-1.2pp
Water consumption (m ³) ⁴	106,743	75,510	-29.3%
Water consumption (m ³) per FTE ²	23.9	16.6	-30.2%
Waste (t) ⁵	162.5	237.4	46.1%
Waste (kg) per FTE ³	67.9	55.9	-17.7%
% of waste diverted from landfill	40%	34%	-6pp
Waste (kg) diverted from landfill per FTE ³	27.1	19.0	-29.9%
Waste (kg) to landfill per FTE ³	40.8	36.9	-9.6%
Total paper use (t)	156	144	-7.3%

[1] FTEs defined as permanent full time employees only. For more information, see page 74.

[2] FTE figures exclude New York and AFS for 2023 and 2024.

[3] FTE figures exclude AFS, Istanbul, Milan, New York, Paris and Tunisia for 2023 and 2024. Jordan and Egypt are excluded in 2023 only.

[4] Reduction attributable to combination of reduced consumption alongside revised, more granular calculation methodology employed for 2024.

[5] Increase attributable to inclusion of Jordan and Egypt for 2024 (2023: not reported). If Jordan and Egypt were excluded from 2024 on a like-for-like basis, waste reported would be 134.3t for 2024, a reduction of 17.3% year-on-year.

Business Continuity

Bank ABC continues to enhance its business continuity and disaster recovery capabilities across the Group, ensuring the Bank remains resilient to operational disruptions and accommodate growing business needs. This is achieved through rigorous scenario testing of business continuity and disaster plans including training activities for employees.

In 2024, Bank ABC focused on integrating operational resilience activities to further strengthen its ability to withstand extreme disruptions. Promoting a culture of operational efficiency and resilience, the Bank is undertaking enhanced scenario testing, critical third-party assurance and crisis management activities, which support continued strategic growth and value creation.

Our Progress

With the recent launch of our three-year environmental initiative, we are targeting reduction efforts in six major operations - Bahrain, London, Egypt, Jordan, Tunisia and Algeria. Together they comprise 88% of our Group's energy usage, 92% of water consumption and 93% of the GHG emissions generated by water and energy consumption.

The first phase targets Bahrain, London and Egypt, which collectively contribute 64% of the Group's energy usage, 75% of water consumption, and 63% of our water and energy related emissions. The second phase, beginning in 2026, will capture the remaining three operations of Jordan, Tunisia and Algeria. We expect to start realising the benefits from reduced energy, water and GHG emissions in late 2025.

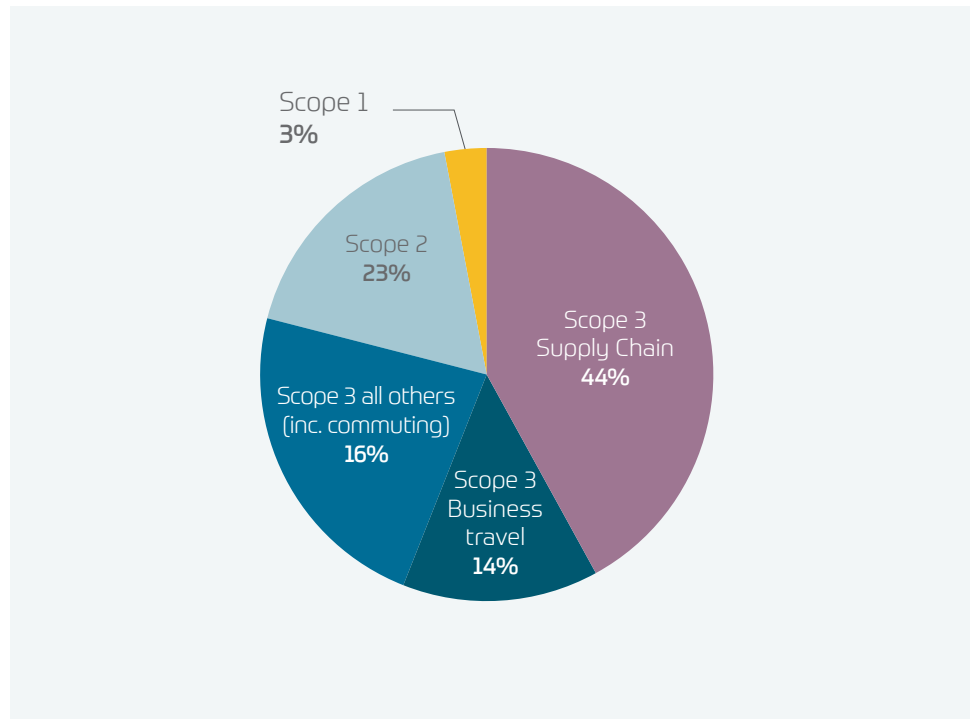
The inclusion of supplier emissions in 2023 marked a significant expansion of our reporting scope. In 2024, we further improved both the quality and coverage of our data - particularly across our Tunisia, Jordan and Egypt operations - capturing a broader range of water usage,

waste and other data. Looking ahead, we aim to further strengthen our insights through a spend-based methodology and better identify emission hotspots across purchased goods and services. This will enable more targeted supplier engagement and drive focussed emission reduction.

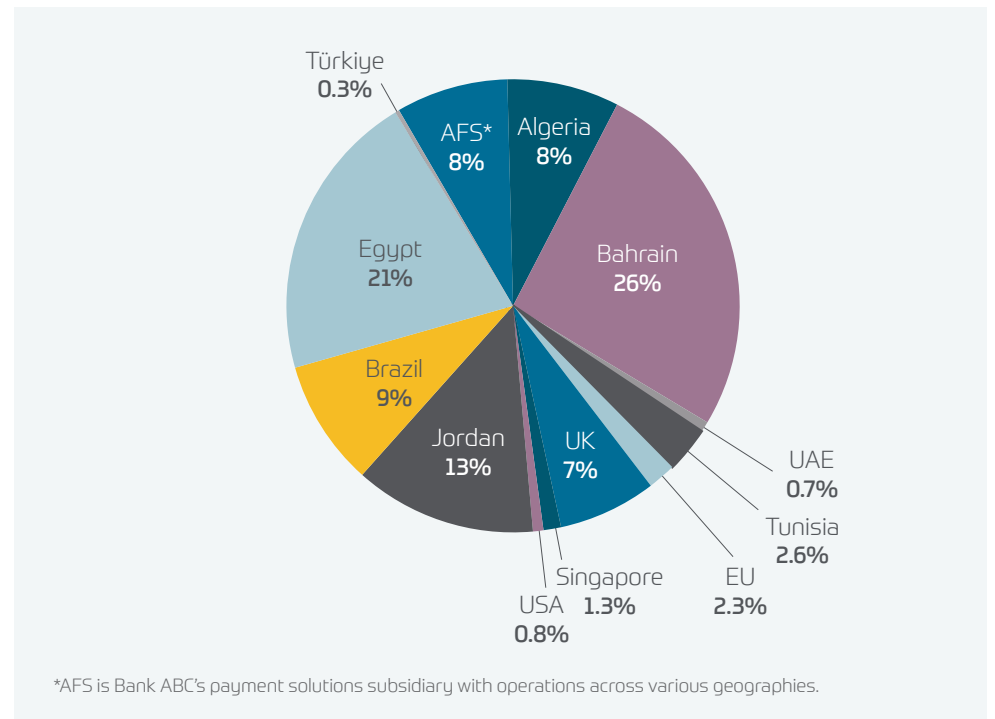
Scope 1, 2 & 3 GHG emissions

In 2024, we measured the environmental impact along our entire value chain, including upstream activities such as business travel, staff commute and supplier-related emissions. Our Scope 3 GHG emissions, accounted for 74% of our total Scope 1, 2 and 3 GHG emissions with suppliers alone generating 44%. This significant contribution highlights the importance of engaging with our supply chain to support the reduction of supplier footprint as part of our broader decarbonisation efforts.

Bank ABC's Scope 1, 2 & 3 GHG Emissions Split by Category (% , 2024)



Bank ABC's Scope 1, 2 & 3 GHG Emissions Split by Geography (% , 2024)



*AFS is Bank ABC's payment solutions subsidiary with operations across various geographies.

Bank ABC Group's Scope 1, 2 & 3 GHG Emissions in 2023 and 2024

GHG Emissions (t CO ₂ e)	2023	2024	Change (YoY)
Scope 1	1,340	1,297	-3.2%
Scope 2 – location based	10,572	10,160	-3.9%
Scope 2 – market based	8,768	8,541	-2.6%
Scope 3	31,565	31,889	1.0%
Scope 1 & 2 – location based	11,912	11,457	-3.8%
Scope 1 & 2 – market based	10,108	9,838	-2.7%
Scope 1, 2 & 3 – location based	43,476	43,346	-0.3%
Scope 1, 2 & 3 – market based	41,673	41,727	0.1%
Scope 1, 2 & 3 per FTE ¹ – location based	8.9	8.7	-2.8%
Scope 1, 2 & 3 per FTE – market based	8.5	8.3	-2.4%

[1] FTEs defined as permanent full time employees only. For more information, see page 74.

Total Scope 1, 2 and 3 GHG emissions decreased by 0.3% annually on a location-based reporting basis, and increased by 0.1% on a market-based basis. On a per FTE basis, emissions declined by 2.8% on a location-based basis and 2.4% on a market-based basis. The reduction in absolute terms was achieved despite a rise in our Scope 3 emissions due to an increase in business travel and commuting associated with increased headcount and higher client activity in 2024 versus 2023. The magnitude of supplier-related emissions underlines the need for a more targeted approach to addressing those emissions.

The slight reduction in our total Scope 1, 2 and 3 emissions, hides a 4% decline in our absolute location-based Scope 1 and 2 emissions. The reduction was due to the implementation of several meaningful initiatives over and above our 3-year environmental reduction plan. Examples in our Bahrain head office included changing building air conditioning settings to an economy mode for evenings and the weekend; introducing motion sensors linked to the A/C system to switch off air conditioning when meeting rooms are not in use. Other notable actions across our global operations are outlined in the following sub-sections. Importantly, we now have more granular emission reporting and detailed carbon emission factors, improving the validity and accuracy of the data.



Energy Consumption

Bank ABC Group's Energy Usage

Energy (kWh)	2023	2024	Change (YoY)
Energy usage ³	25,040,039	24,067,724	-3.9%
Energy usage per FTE ⁴	5,132	4,810	-6.3%
Percentage renewable	17.1%	15.9%	-1.2pp

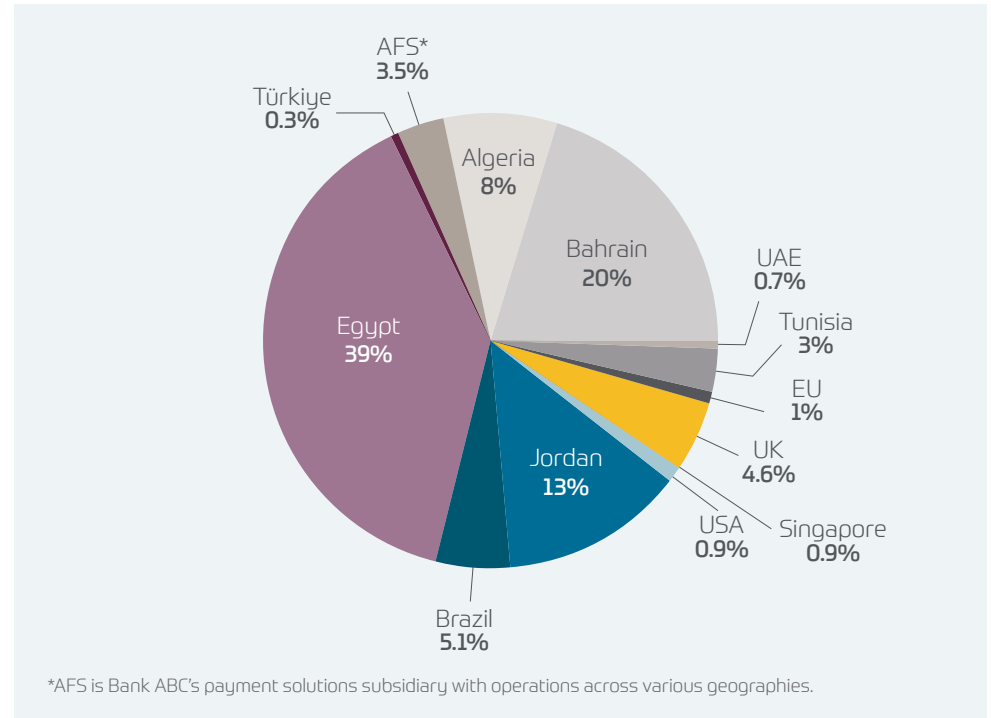
[3] Gross figures capture Primary Energy Demand and do not account for Bank ABC's off-site grid-scale solar farm.
 [4] FTEs defined as permanent full time employees only. For more information, see page 74.

Our absolute energy consumption fell by 4% in 2024 versus the previous year and by -6.3% on a per FTE basis. The 4% decline in energy consumption marks a significant improvement compared to the 9% year-on-year increase recorded in 2023. This progress was supported by notable reductions in the energy usage across our Bahrain, Algeria and Brazil operations, posting year-on-year reductions of 8%, 10% and 15% in 2024, respectively. These three countries contributed to 33% of the Group's total energy consumption in 2024.

The various initiatives that helped reduce our energy consumption across the network, included the replacement of florescent lighting with LED lights in Bahrain, Egypt, Algeria, Tunisia, London and Brazil. In addition, lighting motion detectors were installed in Bahrain and Tunisia. Additionally, Tunisia also installed a voltage regulator to minimise the voltage taken from the grid. Meanwhile in Brazil, window film was replaced with blinds to reduce heat and excessive use of air conditioning.

Energy from renewable sources comprised 15.9% of the Group's total energy consumption in 2024, a marginal decline from the previous year. Brazil and London operations used renewable energy procurement arrangements equivalent to 100% of their energy needs, while Jordan sourced 79% from a Bank ABC commissioned solar farm. This was a decrease from the 100% sourced by Jordan in 2023. This decline was due to a rise in their primary energy demand and a 9.1% reduction in energy generation from their solar farm. Despite this, Jordan's solar farm avoided 1,293 t CO₂e by not sourcing this energy from Jordan's electricity grid. The Bank's Frankfurt and Singapore operations sourced 12% and 5%, respectively, of their energy from renewables. The renewable energy sourced for our London operation was procured via REGO certificates, a crucial market-based mechanism that encourages the scaling of renewables in the UK. An equivalent mechanism, known as International Renewable Energy Certificates (I-REC) were procured in Brazil, equivalent to the Bank's electricity consumption in the country. Consequently, market-based emissions were zero for both locations. While we continue to explore more opportunities to expand our sources of energy from renewables, infrastructure limitations, especially in the MENA region, remain a constraint.

Energy Usage Split by Geography (% , 2024)



Water Consumption

Bank ABC Group's Water Consumption

Water Consumption (m ³)	2023	2024	Change (YoY)
Water consumption	106,743	75,510	-29.3% ⁵
Water consumption per FTE ⁴	23.9	16.6	-30.2%

[4] FTE figures exclude New York and AFS for 2023 and 2024. FTEs defined as permanent full time employees only. For more information, see page 74.

[5] Reduction attributable to combination of reduced consumption alongside revised, more granular calculation methodology employed for 2024

Water consumption posted a significant year-on-year decline of 29% to 75,510 m³ in 2024. This translated to a drop of 31% on a per FTE basis. The reduction in water consumption was largely attributed to improved accuracy in reporting along with being supported by several initiatives, such as the installation of twenty-two electronic water mixer taps in Tunisia offices

and the installation of new flush tanks for the toilets as well as automatic sensor mixers in Bahrain. Across the Group, no water is currently recycled or reclaimed. Options such as rainwater collection systems are being explored in locations such as London.

Waste

Bank ABC Group's Waste

Waste Category	2023	2024	Change (YoY)
Total waste (t) ⁷	162.5	237.4	46.1%
Total waste (kg) per FTE ⁶	67.9	55.9	-17.7%
Total waste to landfill (t)	97.6	156.8	60.7%
Total waste to landfill (kg) per FTE ⁶	40.8	36.9	-9.6%
% of waste to landfill	60%	66%	+6pp
Total waste (kg) diverted from landfill per FTE ⁶	27.1	19.0	-29.9%
% of waste diverted from landfill	40%	34%	-6pp
Breakdown of Recycled Waste			
Paper (t)	36.9	70.8	91.9%
Plastic (t)	23.1	5.6	-75.7%
Cardboard (t)	3.3	3.5	6.1%
Metal (t)	1.3	0.6	-53.8%

[6] FTE figures exclude AFS, Istanbul, Milan, New York, Paris and Tunisia for 2023 and 2024. Jordan and Egypt are excluded in 2023 only.

[7] Increase attributable to inclusion of Jordan and Egypt for 2024 (2023: not reported). If Jordan and Egypt were excluded from 2024 on a like-for-like basis, waste reported would be 134.3t for 2024, a reduction of 17.3% year-on-year.

Bank ABC Group's total waste reported rose 46% in 2024 versus the previous year as we improved our data capture and widened our scope to include the waste generated by our Egypt and Jordan operations, resulting in an 18% reduction in total waste per FTE. The inclusion of Egypt and Jordan materially contributed to the 61% increase in waste to landfill. This also resulted in the percentage of waste that we diverted from landfill falling to 34% from 40% in 2023 as we captured more data from our operations that currently lack the adequate infrastructure to recycle their waste.

We are pushing forward with waste saving initiatives across the Group. Our Bahrain office stopped the purchase of single use paper and plastic cups and plastic water bottles. Water filtering machines are now being installed throughout our head office to replace all the large plastic water dispenser coolers. Our 'bin the bin' initiative has now been launched globally including our Singapore, Tunisia, Egypt and Brazil offices, to increase waste recycling.

We continue to evaluate opportunities to further reduce our waste generation and increase recycling. That being said, our ability to recycle more of our waste continues to be constrained by the lack of adequate waste management infrastructure in certain countries, notably in the MENA region. Hazardous waste is not currently measured.

Bank ABC Group's Paper Consumption

Paper Consumption (Mt)	2023	2024	Change (YoY)
Paper consumption (t)	156	144	-7.3%
% of paper diverted from landfill	24%	49%	+25pp

Total paper consumption fell by -7.3% in 2024 versus 2023 while the amount we recycled doubled. The decline in consumption was driven by a -66% reduction in paper consumption in our Brazil operations. This sharp decline was enabled by several technological initiatives, most notably the intensive adoption of document scanning processes and the implementation of electronic signature tools. We are accelerating the adoption of technology to further reduce paper consumption, especially across our corporate and retail customer experience. ila Bank (Bahrain and Jordan) has a fully digitalised client onboarding process including virtual products such as debit and credit cards. We now also offer our corporate clients a fully digitalised onboarding and access to trade finance, supply chain finance and cash management solutions through a state-of-the-art digital platform.



Next Steps

While our three-year environmental reduction plan is currently underway, we are conscious that there is still a lot of work to do to address the full environmental impact of our operations. With this in mind, we are engaging with external specialists to identify further opportunities to reduce GHG emissions, energy consumption, water usage, and waste generation as well as to increase recycling and renewable energy sourcing.

At the same time, we acknowledge that further progress will depend on the continued development of enabling infrastructure across the MENA region, particularly in expanding access to renewable energy and waste recycling, including hazardous waste.

An additional area of focus is the strengthening of the incorporation of ESG risk into our global procurement process. As noted earlier, suppliers are a major contributor to our emissions, 44% of our Scope 1, 2 and 3 GHG emissions. In 2025, we aim to onboard a global procurement management system that will provide the necessary platform from which we can embed ESG risk into our vendors' management process. Ultimately, this will allow us to better understand our supply chain, foster closer vendor engagement and reduce the environmental impact of our suppliers.

Initiative	Description	Benefit
Develop environmental reduction plan for suppliers.	<ul style="list-style-type: none"> Onboarding of a group-wide procurement system. Supplier ESG engagement strategy to be developed. 	<ul style="list-style-type: none"> Reduce environmental impact of our suppliers. Ensure compliance with Bank's Code of Conduct, Human Rights and Forced Labour. Reduce costs and increase efficiency.

In 2025, we aim to onboard a global procurement management system that will provide the necessary platform from which we can incorporate ESG risk into our vendors' management process.



3.3: Risk Management



“Proactive Risk management is essential for building trust with our stakeholders and ensuring long-term growth while upholding our responsibilities to society and environment. By identifying and mitigating ESG-related risks, we not only safeguard our Bank’s assets but also contribute to a more sustainable and resilient economy.”

Sedjwick Joseph

Group Chief Credit & Risk Officer

Our Approach

As part of its Group Risk Appetite, Bank ABC recognises ESG risk as one of its 8 strategic risk objectives. Noting the fast-moving landscape of ESG risks, Bank ABC has adopted an evolving approach for the identification, assessment, management and reporting of ESG risks. A better understanding of such risks across our value chain strengthens our capacity to manage ESG risks, as it supports the financial stability of the bank as well as the wider financial system. This also enables us to better serve our clients’ financing requirements.

Our sustainability strategy and Group ESG Risk Standard have set out specific initiatives and processes to embed ESG risk across our risk management system encompassing credit, treasury, operations, social and reputational risks.

Recognising the ESG transformation journey requires cultural as well as procedural change, we are investing in building internal capability and skillset through training and awareness programmes.

Our Progress

A major focus in 2024 was developing key initiatives to incorporate ESG risk into our client engagement and credit approval process. Bank ABC’s most material ESG-related risk arises from our Scope 3 – in other words the GHG emissions generated by clients’ activities we finance.

Given the significance of Scope 3 financed emissions, we are enhancing processes to better support our clients in their decarbonisation/transition journeys. These insights enable our client-facing teams to take a more tailored approach to lending and supporting our clients’ transition strategies. In parallel, we are maintaining our focus on building internal capability and launched a global training programme for our client-facing teams in 2024, to further deepen our understanding of client ESG risks.

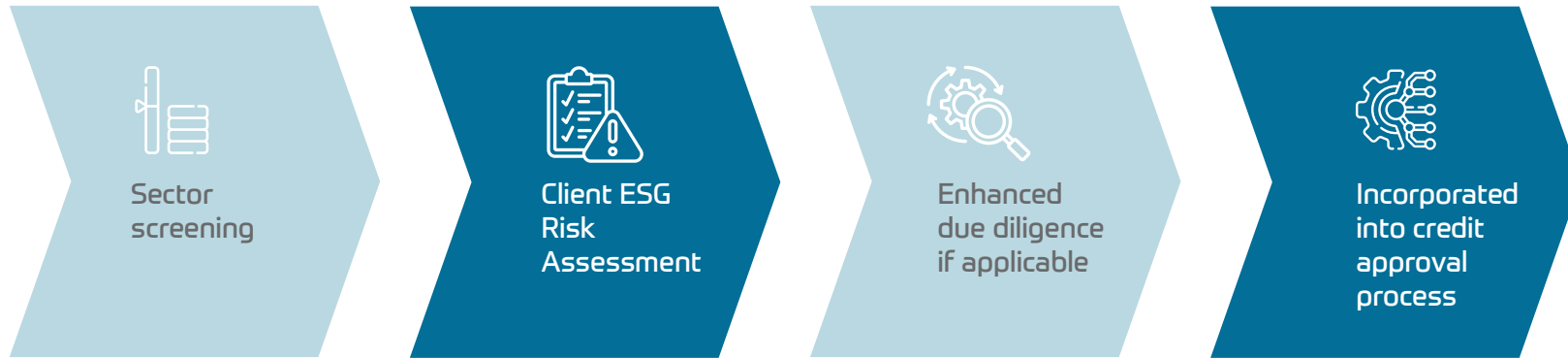
ESG Risk Standard

The Group ESG Risk Standard enhances our approach by deepening and widening the scope from our previous Group Climate Change Risk Standard. It defines how we incorporate ESG risk across the Bank and provides a robust framework to ensure ESG risk is effectively measured, managed and reported across all subsidiaries and branches.

Client ESG Risk Assessment

A key achievement in 2024 was the development of our bottom-up Client ESG Risk Assessment process, together with our Industry Environmental Risk Rating methodology. The former enables the incorporation of client ESG risk into our lending process and client engagement, while the latter assesses environmental risk at the sector and overall portfolio level. They also ensure we meet the increasing regulatory requirements to factor ESG risk into the Bank’s credit decision.

Client ESG Risk Assessment Workflow



The Client ESG Risk Assessment is being rolled out across our global network and we expect it to be fully implemented in 2025. This assessment tool, along with several other new processes, will capture valuable data and insights that will allow us to refine our approach.

Client ESG Risk Assessment: Approach & Benefits



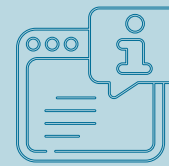
Incorporates client ESG risk into credit process

- Proprietary bottom-up approach that generates an objective client ESG score and rating.
- Evaluates how clients are managing their ESG risks.
- Includes ESG Enhanced Due Diligence (EDD) for high-risk clients.
- Ensures we meet our regulatory requirements.



Identifies financing opportunities

- Enhances client engagement.
- Deepens our ability to support our clients' transition strategies.
- Applicable to clients that have yet to begin their sustainability journey or those well advanced.



Captures valuable client information

- Allows us to evaluate client ESG scores over time and between clients.
- Captures client's forward-looking plans to decarbonise.



Strengthens capability of client-facing teams

- Launched training and support programme for Wholesale and Credit.
- Minimal disruption to relationship manager's workflow.

The Client ESG Risk Assessment is based on a structured ESG questionnaire and allows us to translate the more subjective elements of ESG risk into a client ESG score and overall ESG rating. At the outset, the assessment will only be applied to companies operating in environmentally risky industries as defined by our proprietary Industry Environmental Risk Rating.

The questions, weighted by importance, cover topics such as ESG-linked remuneration, interim emission reduction targets, a defined transition plan and strategy and physical risks assessment. Each client gets an overall ESG score out of 100. The overall score places significant weighting to the governance and environmental related questions due to governance being a lead indicator of how well a company manages its ESG risks and the importance of reducing a company's environmental impact. Depending on the overall ESG score, clients are assigned an ESG risk rating of Low, Moderate, High or Very High.

Industry Environmental Risk Rating

Our Industry Environmental Risk Rating methodology defines an environmental risk rating for over 43 global industries. The tool evaluates environmental risk at the sector level, providing valuable insights to our business teams on the environmental risks facing each industry, along with various transition strategies being adopted by each sector.



Industry Environmental Risk Rating: Approach & Benefits

The benefits

- Evaluates environmental risk at the portfolio and sector level.
- Detailed sector understanding.
- Provide sector data for the business teams.
- Supports regulatory requirements.

Environmental risk rating applied to each industry

- Proprietary top-down approach that provides an environmental risk rating for 43 industries.
- Based on qualitative and quantitative evaluation.
- Overall rating includes 3rd party ratings and analysis.
- Sectors rated Low, Moderate, High or Very High.

Industry Environmental Risk Rating (ERR) calculated by combining the ERR of 6 environmental factors:

- Greenhouse gas emissions
- Transition risk
- Toxic emissions
- Water
- Waste
- Ecological impacts

The approach awards each sector an environmental risk rating of Low, Moderate, High or Very High based on their overall environmental score between one and four - one being positive and four being negative. It uses a combination of our own quantitative and qualitative analysis in combination with third-party ratings from leading global data providers and NGOs. All sectors are rated across six criteria covering climate, water, waste, toxic emissions, ecological impacts and transition risks, with a double weighting given to climate risk given its interconnection with others and the ability to exacerbate all other risks. The method has been benchmarked against leading industry peers to ensure integrity of approach.

Industry ratings are provided in a standard three slide format per sector, along with examples of leading practice or notable risks within given sectors. These insights are shared across the business and complemented by globally deployed training to upskill relationships managers. They also serve as a practical reference, highlighting key sector considerations to support effective client engagement.



Click on the image or scan the QR code to watch Thomas Patience, Deputy Head of Sustainability discuss the Bank's ESG Risk framework.



Climate Scenario Analysis

As part of its regular Integrated Stress Testing and related Internal Capital Adequacy processes, Bank ABC has incorporated systemic and idiosyncratic climate change scenarios since 2021. The Bank uses the latest climate change scenarios (from moderate to severe), that have been developed by the Network for Greening the Financial System (NGFS). The impact assessment of the climate change scenarios on the Bank's capital, earnings, asset quality and liquidity, also considers feasible and viable management mitigation actions that the Bank

can take to ameliorate the impact of these scenarios. In addition, the impact of idiosyncratic climate change scenarios on the Bank's credit risk profile is also assessed. The assessment includes review of both transition and physical risks. This assessment demonstrates that the Bank has adequate capital and liquidity to withstand the severe stress scenarios arising from ESG risks.



Next Steps

The Bank will continue to assess and develop its approach of managing, measuring and reporting ESG risks in line with the evolution of industry best practice, stakeholder expectations and regulatory requirements. The Group Risk Appetite ensures that the ESG Risks are appropriately managed. The Group Risk Appetite sets out metrics and thresholds to monitor the relevant ESG risks. Given that ESG is an evolving area, the Group Risk Appetite will evolve over time.

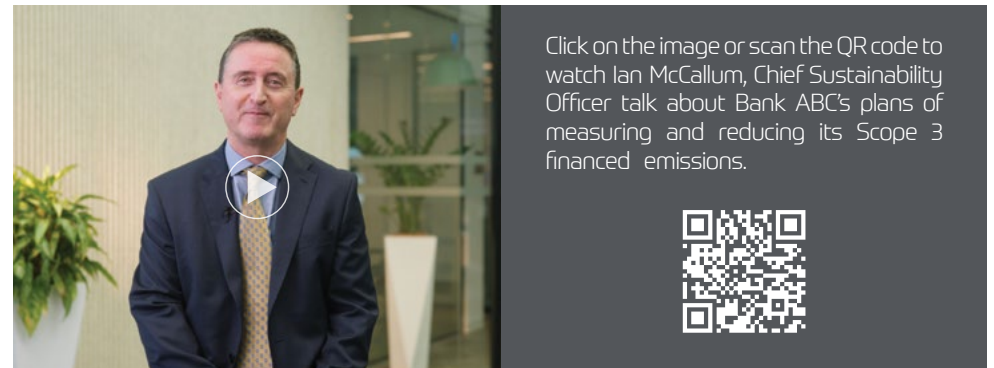
Scope 3 Financed Emissions

A core focus will be accelerating our efforts to mitigate our Scope 3 financed emissions in line with the methodology set out by Partnership for Carbon Accounting Financials (PCAF)⁽⁸⁾. This reinforces our role as a signatory to the Partnership for Carbon Accounting Financials (PCAF) and an early adopter of the methodology in the MENA region. An active participant in regional PCAF calls, the Bank continues to advocate for the development of a standardised approach towards trade finance categories, including accounts receivables, letters of credit and other related instruments, given the core composition of its lending book.

We will finalise the calculation of our Scope 3 financed emissions and evaluate our approach to mitigate those emissions. We recognise that any Scope 3 reduction strategy will largely depend on our clients' transition pathways and their progress in reducing their own emissions and therefore requires close client engagement as we work with our customers, notably our high emitting clients, to support their transition strategies.

(8) www.carbonaccountingfinancials.com

By combining the measurement of our Scope 3 financed emissions with the application of our Client ESG Risk Assessment, we gain a more comprehensive view of our clients' approach to decarbonisation efforts. While Scope 3 financed emissions provide a 'point-in-time' snapshot of current exposure, they do not indicate future performance. In contrast, our Client ESG Risk Assessment takes a forward-looking approach, allowing us to evaluate the credibility of our client's emission reduction plans and, by extension, the Bank's potential to lower our Scope 3 financed emissions over time.



Click on the image or scan the QR code to watch Ian McCallum, Chief Sustainability Officer talk about Bank ABC's plans of measuring and reducing its Scope 3 financed emissions.



Initiative	Description	Benefit
<p>Measurement of Scope 3 financed emissions and evaluate our mitigation approach.</p>	<ul style="list-style-type: none"> • Measure our Scope 3 financed emissions in line with PCAF methodology. • Evaluate possible strategies for mitigation. 	<ul style="list-style-type: none"> • Deepen our understanding of the environmental impact of our financing. • Provide a platform to develop a targeted client engagement strategy. • Generate revenue opportunities.

ABC Bank ABC

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ABC

3.4: Financing the Transition



“We believe that incorporating sustainability into our financial offering not only drives innovation but is also aligned with our values as an organisation. By supporting projects and initiatives that promote environmental stewardship and social equity, we aim to empower clients to achieve their goals while contributing positively to a sustainable future.”

Amr ElNokaly
Group Head of Wholesale Banking

Our Approach

Bank ABC's unique global footprint, leadership in digital innovation and deep expertise, positions us to work closely with our clients and support their transitions. This is a key element of our sustainability strategy and is focused on leveraging our global network to deepen client engagement and accelerate our sustainable and transition finance offering.

In the past two years, almost 90% of our sustainable finance was channelled to emerging markets, capitalising on our geographical footprint across GCC, North Africa, Türkiye, Brazil and South-East Asia. We are enhancing our capabilities to scale the support of our clients' future financing needs through the launch of various initiatives. These include enhancing client engagement through comprehensive training programmes for our client-facing teams, developing innovative solutions to address the diverse needs of our clients and collaborating with them to unlock novel solutions.

We introduced our Sustainable Finance Framework (Framework), which provides a robust approach to measuring and reporting sustainable finance. It outlines the methodology for classifying our sustainable financial products and services, across green, social, sustainable and sustainability-linked finance. The Framework was developed in collaboration with the Institutional Shareholder Services (ISS) Corporate, a leading global provider of ESG analysis and ratings.

Our sustainable finance assets are generated from activities classified under green, social, sustainable and sustainability-linked financing as defined by our Sustainable Finance Framework. Transition finance is not included in our classification of sustainable finance as transition finance relates to finance provided to high carbon emitting industries and thus falls outside the scope of sustainable finance. Nevertheless, we expect transition finance to become an increasingly important business segment as we recognise the substantial impact that can be achieved by aiding high carbon emitting clients in their transition strategies. As such, we have defined transition finance in the appendix of our Sustainable Finance Framework and report separately on that.

Having said that, we also recognise that sustainable and transition finance are closely inter-related. Increasing the scale and capacity of renewable energy and other clean technologies via sustainable finance is a key enabler that allows high carbon emitting industries to accelerate their decarbonisation strategies by ensuring access to clean energy sources. At the same time, these high carbon emitting industries require significant levels of transition finance to invest in the new technologies and processes that allow their shift toward a low carbon economy.



Click on the image or scan the QR code to watch Christopher Wilmot, Group Head of Treasury and Financial Markets, talk about the Bank's achievements in Sustainable Finance in 2024.



Green, Social, Sustainable and Sustainability-linked Product Framework	Transition Finance Framework
<p>Bank ABC's Sustainable Finance Framework ("SFF") sets out the methodology for classifying our sustainable financial products and services, specifically how we define green, social, sustainable and sustainability-linked finance.</p> <p>The Sustainable Finance Framework:</p> <ul style="list-style-type: none"> • Sets our approach to mitigating greenwashing risks across our sustainable assets and liabilities. • Defines the themes and activities that we deem eligible for green, social and sustainable finance. • Is informed by international guidelines and standards on sustainable finance. • Fully aligned with ICMA's (International Capital Market's Association) and LMA's (Loan Market's Association) sustainability principles and UN SDGs. • Has been co-developed with ISS to ensure it is aligned with international best practice. 	<p>Our approach to Transition Finance is outlined in Appendix 4 of our Sustainable Finance Framework with reference to the International Capital Market Association (ICMA)'s Climate finance Handbook and the Climate Bond Initiative (CBI)'s Transition Finance white Paper.</p> <p>Transition finance refers to finance that is provided to carbon-intensive companies that are in the process of structurally shifting their business and/or activities to a low carbon trajectory.</p> <p>The Transition Finance Framework:</p> <ul style="list-style-type: none"> • Supports our commitment to empower our customers to lead the drive to a low carbon economy and align with the Paris Climate Agreement. • Provides a crucial gap between sustainable finance and finance required by those businesses operating within hard-to-abate industries. • Includes a clear definition and list of eligible activities which provides clarity to the disclosures that are required to credibly position the use of proceeds as transition finance.

OUR SUSTAINABLE FINANCE FRAMEWORK

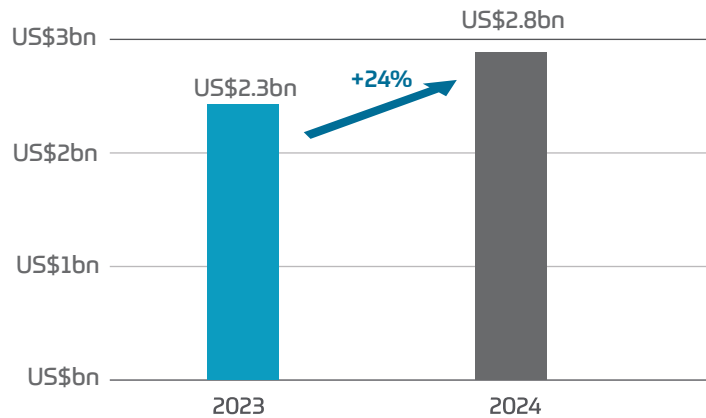
Scan below QR to view

Our Progress

In 2024 we mobilised US\$2.8b of sustainable finance, marking a 24% increase from the US\$2.3b in 2023, and demonstrating our continued commitment to support our clients on their sustainability journeys. Our sustainable finance provided during the year represented 15% of our outstanding loans and advances as at the end of 2024. In addition, the Bank acted as Joint Lead Manager in arranging \$2.1b of green, social and sustainable sukus.

Importantly, 86% of our sustainable finance was to developing countries, a similar level to 2023, underscoring our unique ability to capitalise on our truly global footprint and bridge the climate funding gap in the developing world. To put this into context, the International Energy Agency (IEA) reported that, excluding China, only 15% of the US\$2.1 trillion of global green finance provided in 2024, was channelled to developing countries.

Sustainable Finance: 2024 vs 2023



In 2024, the split of our sustainable finance by category, was 60% green finance, 31% social, 6% sustainable and 3% being sustainability-linked initiatives. Approximately half of our social finance was allocated to SME and microfinance, which combined comprised of 17% of our total sustainable finance during the year. This distribution highlights the Bank's pivotal role in stimulating economic growth and promoting financial inclusion across our communities.

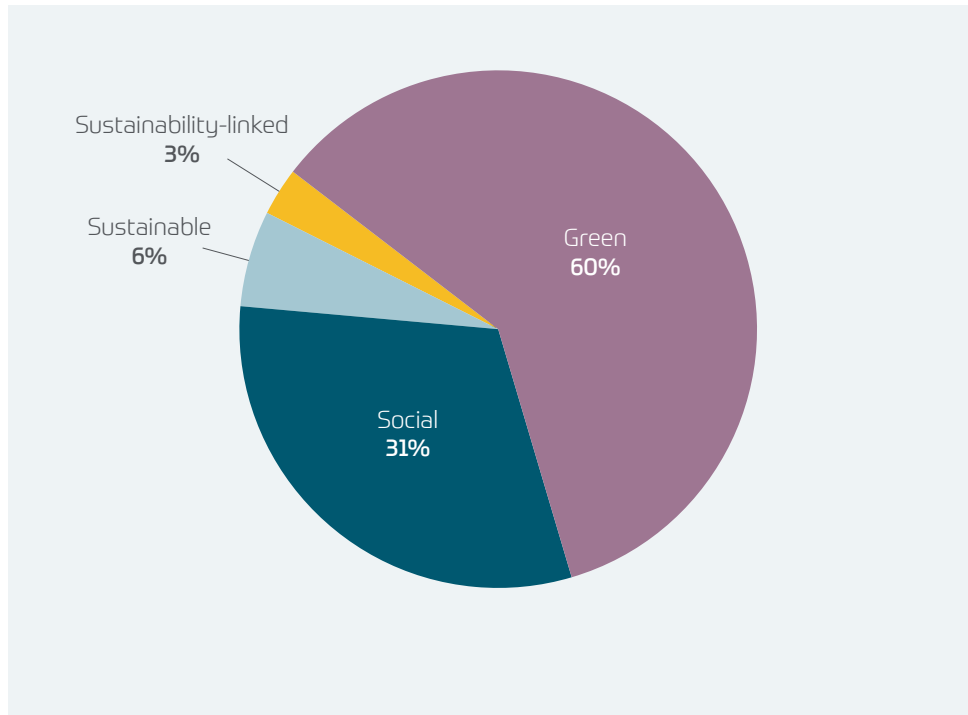
Another positive milestone was the diversification of our sustainable finance across a wide range of industries. Seven industries accounted for 75% of the sustainable finance during the year: multi-utilities, real estate, agriculture, retail, financial institutions, transport and professional services.



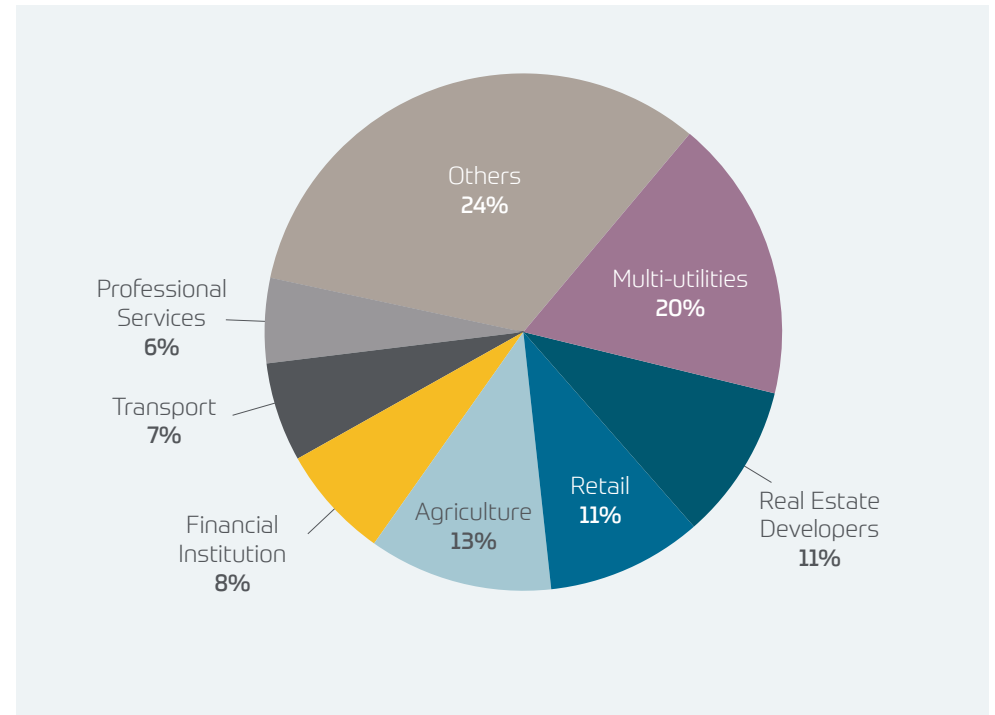
Group CSO conducting training for frontline teams



Bank ABC's Sustainable Finance, Split by Category (% , 2024)



Bank ABC's Sustainable Finance, Split by Sector (% , 2024)



Our Sustainable Finance Success Stories in 2024

Case Study 1: Financing the Transformation of a Major UK Paper Mill

Bank ABC was appointed lead arranger for the financing of a paper mill development in Wales, owned by a subsidiary of a large Turkish containerboard and paper manufacturer. The project involves the conversion of an existing facility into one of Europe's largest and most technologically advanced mills for containerboard and tissue paper production.

Our financing will play a key role in transforming the site into a highly efficient, sustainable operation that uses 100% recycled materials for containerboard production. Once operational, the mill is expected to generate 75% of its sales from containerboard, 10% from recycled materials and 15% from tissue paper. The tissue paper production will use raw materials sourced exclusively from sustainably certified pulp. With annual production capacity of 750,000 tonnes of containerboard and 67,000 tonnes of tissue paper, the facility is designed with future expansion in mind.

The mill will be powered by an on-site Combined Heat and Power (CHP) plant, improving fuel efficiency and reducing waste. The CHP system is expected to achieve efficiency rates exceeding 90%, compared to 52% for a typical UK gas-fired power stations. It will also harvest recycled waste wood and biomass, thereby using green energy and reducing dependency on gas. Notably, the CHP is hydrogen-enabled, allowing for the use of a 20% hydrogen fuel blend further supporting the transition to low-carbon energy for both the mill and the surrounding area.



“Bank ABC in Europe is excited to be working with Modern Karton Sanayi ve Tic AŞ and Eren Holding AŞ to partially finance the development of Shotton Mill into an advanced and sustainable containerboard and tissue paper manufacturing plant. The project is backed by UKEF’s “Clean Growth” EDG. Shotton Mill will be the largest materials recovery and recycling facility in the UK, featuring a water treatment plant that minimises freshwater use. It will use 100% recycled paper for its container board production and will have direct access to the UK’s largest solar park, Shotwick, as well as a 25MW biomass Combined Heat & Power plant.”

Charlotte Wiltshire
European Head of Wholesale Banking

Case Study 2: Paper Manufacturer in Saudi Arabia

The sustainability-linked credit facility was specifically structured to support the company on its journey to deliver sustainable and profitable growth. This financing was endorsed by the Italian Export Agency, SACE, which rigorously evaluated and confirmed the company's compliance with their ESG standards.

The Saudi paper manufacturer operates a U.S. FCA-compliant manufacturing and recycling facility, sourcing raw materials that are Forest Stewardship Council (FSC) certified from responsibly managed forests that provide environmental, social and economic benefits to the community.

The company holds three ISO certifications covering occupational health & safety, quality control and environmental management systems. The new machinery will not only increase production but improve energy and water efficiency. Additionally, the installation of solar panels at the new manufacturing plant will boost the company's renewable energy generation.



IMPACTS:
 Reduced energy
 Reduced waste
 Reduced GHG emissions



“When you think of paper, sustainability might not be the first thing that comes to mind. It is hence important to collaborate with a client that shares our enthusiasm for sustainability. Saudi Paper Group is a strong example—a company committed to ethically sourcing pulp through Forest Stewardship Council certified resources. At the same time, they are investing in a recycling facility to create a closed-loop system, recycling waste paper into pulp for their own supply chain and supporting a circular economy. Our KPI-linked pricing model, which rewards progress on recycling and energy efficiency targets, demonstrates how FIs can enable positive change in manufacturing.”

David D’Costa
 Head of Local Corporates, Group Corporate Coverage

Case Study 3: Steel Company in GCC

Bank ABC jointly acted as Mandated Lead Arranger to support a leading steel company in securing a US\$450 million sustainability-linked, senior secured dual-tranche financing facility. Of the total amount, 38% was allocated to constructing a stockyard shed equipped with rooftop solar panels, as well as financing working capital requirements.

The facility set the following sustainability-linked KPIs:

1. Reduction in total greenhouse gas (GHG) emissions (Scope 1 and Scope 2 emissions) compared to the same period in the previous year.
2. Training completion ratio for workforce on climate change and environmental risks.



IMPACTS:
 Reduced energy
 Reduced GHG emissions



“This loan is structured with key performance indicators and measurable sustainability targets, designed to incentivise the company to exceed mandatory greenhouse gas emissions reductions and implement robust environmental risk management frameworks. The project aligns with both the client’s and Bank ABC’s commitment to ESG principles and supports Bahrain’s national objective of reducing carbon emissions by 30% by 2035.”

Jeremy Dixon
 Group Head of Specialised Finance

Case Study 4: Microfinance & SME Finance in Egypt

Our Egyptian operation continues to expand its sustainable finance offering to its customers, particularly within the SME segment and microfinancing. In 2024, over 90% of Bank ABC Egypt’s sustainable finance was channelled to SMEs and microfinance, split evenly between the two categories. Furthermore, approximately 44% of the microfinance extended by ABC Egypt during 2024 was directed towards women; while the majority of SME financing was directed towards the education and healthcare sectors.

This emphasises our dual role of stimulating small and medium-sized businesses, that are a key driver of economic growth, and promoting financial inclusion across our communities and historically underserved segments.



“Sustainability in banking goes beyond environmental impact — it’s about enabling people, businesses, and communities to thrive. Through our expanded focus on microfinance and SMEs, we are not only advancing our ESG goals but also creating meaningful social and economic impact for our clients and the nation.”

Ahmed Khattab
Head of Wholesale Banking, Bank ABC Egypt

Global Transaction Banking (GTB)

Alongside traditional sustainable loan and bond financing, we are expanding our digital client solutions within Global Transaction Banking (GTB). While the GTB sustainability market is much smaller than the sustainable loan and bond market, it is expanding at a fast pace and offers more recurring income, as transactions typically recur every 30-60 days on average. This presents a significant opportunity for Bank ABC to support clients leveraging our core business areas of Trade Finance and Cash Management, as well as our global network.

Our new digital Wholesale Banking platform offers extensive front-to-back capabilities covering Cash Management, Trade Finance and Supply Chain Finance. A core feature of

the platform is our Buyer-led Supply Finance module, which provides our clients with a fully digitalised supplier financing solution, playing a critical role in promoting financial inclusion.

By fully integrating into our client’s physical supply chain and network, the solution enables seamless access to financing for suppliers. This is particularly helpful for small or medium-sized enterprises (SMEs) that often face barriers to timely and affordable credit. In doing so, it not only supports SME growth but also strengthens economic inclusion and financial resilience.



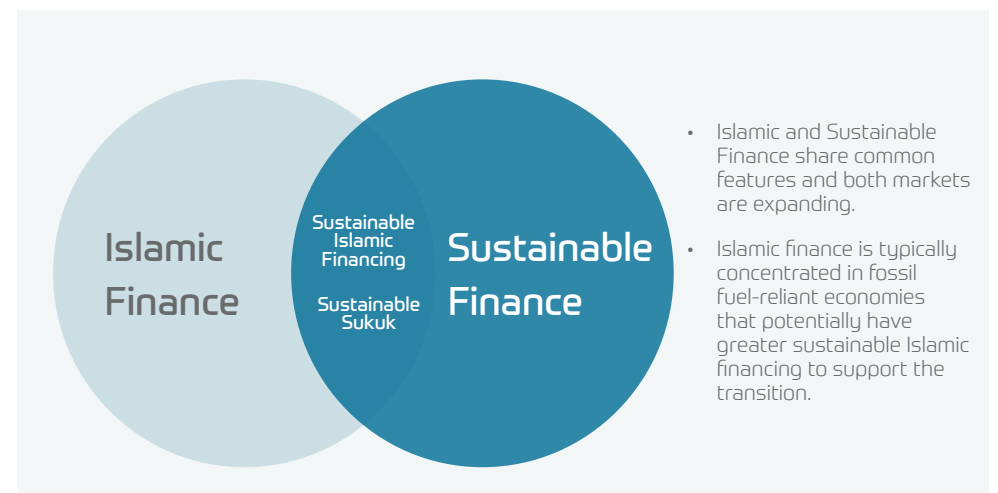
“The design and capabilities of our digital GTB platform not only showcase our commitment to digital transformation, but also underscore our mission to drive sustainable growth across all lines of business. I am confident that this platform will play a key role in Bank ABC’s future success in the sustainable finance sector, enabling us to better serve our clients and stakeholders while promoting environmentally responsible practices. I must also recognise the entire team behind the launch of our state-of-the-art platform—their agile methodologies and expertise were instrumental in bringing this innovative, customer-centric solution to life.”

Karim Labadi
Group Head of Transaction Banking

Islamic Finance

Bank ABC Islamic, our Islamic finance subsidiary, is another important segment of the Group that is strategically well positioned to support our growth in sustainable and transition finance. The Islamic finance market has significant untapped potential as a non-conventional source of sustainable development. Its strong social element leads to a natural close alignment with sustainability and the delivery of UN SDGs. In 2024, Bank ABC was joint-lead manager on a total of \$2.1 billion of green, social and sustainable sukuk issuances. This included being a joint-lead manager for a US\$500 million green sukuk by a Kuwaiti financial institution, marking Kuwait’s first green sukuk. Additionally, the Bank’s commitment to social responsibility was exemplified by its support for 23 charitable organisations in Bahrain through voluntary Zakaat payments and other discretionary funds.

Intersection of Islamic Finance & Sustainable Finance





“Islamic finance has a strong social element that leads to a natural close alignment with sustainability and the UN SDGs. Its very nature encourages investors to create positive non-financial value alongside financial returns, to support a more socially conscious and environmentally friendly system. Bank ABC Islamic has been playing an active role in developing the Islamic sustainable finance market globally and has led some of the region’s landmark deals in green financing.”

Hammad Hassan

Group Head of Islamic Banking & Managing Director, Bank ABC Islamic

Green Retail Finance

Throughout the year Bank ABC’s retail operations made significant progress in strengthening its franchise and building on the continued success of Bank ila, its digital mobile-only bank. Technological innovation and an attractive customer proposition have been the cornerstone of ila’s success in Bahrain and Jordan. Driving sustainability through product innovation is a key focus for ila and Group Retail across our countries of operation of Bahrain, Egypt, Jordan, Tunisia, and Algeria.

The retail business in Jordan and Egypt currently provides finance for electric vehicles and is exploring further opportunities for expansion in its green retail financing offering. The goal is to assist customers live a more sustainable lifestyle by creating opportunities for them to implement green choices.

In 2024, total number of retail customers across ila Bank and Group Retail grew by a strong 16% versus the previous year. This growth further consolidated our strong brand and market position, building on several years of strong customer growth, innovation and a relentless focus on delivering superior customer experience.



“Our recent electric vehicle-focused auto loan campaigns in Egypt and Jordan highlight our ongoing commitment to sustainable banking. At Bank ABC, we are continuously innovating to develop greener branches and exploring products that meet the growing market demand for sustainability.”

Mohamed Almaraj

Group Head of Retail Banking & CEO, ila Bank

Carbon Credit Market

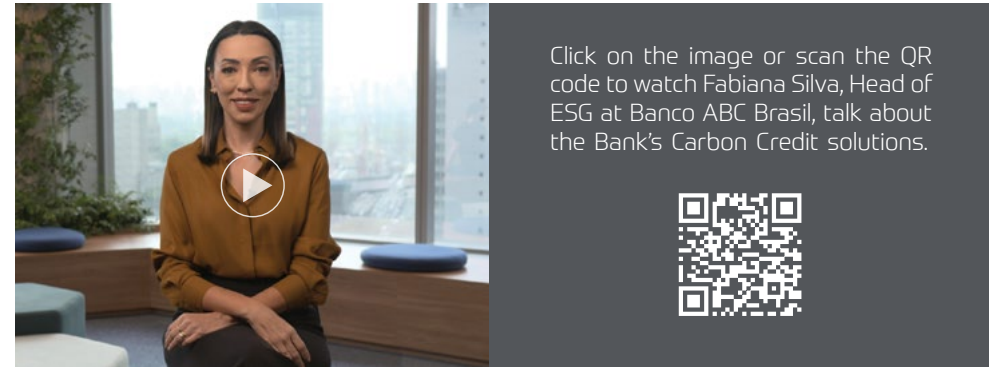
The Brazilian carbon market is another market segment where our Brazilian subsidiary, Banco ABC Brasil (BAB), is actively working to support its clients. The size of the global compliance carbon market is now over US\$800 billion covering 25% of global emissions, dwarfing the voluntary carbon market, valued at US\$2 billion. Europe currently leads the compliance market, but that dominance is expected to shift as emerging markets in Brazil, Türkiye, and India take shape. The expansion of the global compliance market will benefit both the compliance and the voluntary carbon credit markets.

In response, BAB has set up Carbon Credit Solutions Desk to support its clients. This solution allows our Brazilian clients to purchase nature-based voluntary carbon credit to neutralise their residual emissions and complement the decarbonisation solutions already utilised across their value chain.

Microfinance

We recognise the crucial role microfinance provides in driving financial inclusion and economic development. At our Egypt and Tunisia operations, the Bank is leveraging microfinance to support underserved communities and provide growth opportunities. In 2024 we provided US\$45 million in microfinance across Egypt and Tunisia, financing microfinance partners and directly supporting local communities.

In Tunisia, we continued to consolidate our presence in the microfinance sector through constantly enhancing the relationship with main microfinance institutions. In Tunisia, we supported 6,800 micro-entrepreneurs in 2024 with a focus on empowering women and youth, with 60% of our funding reaching female entrepreneurs. In Egypt, approximately 44% of our microfinance was directed towards women. This ensures our financing delivers meaningful impact by reducing inequality and stimulating economic growth.



Next Steps

In our journey to aid corporate clients on their transition strategies, we are introducing key initiatives to equip our client-facing teams with the necessary tools and innovative product solutions. These include our comprehensive Client ESG Risk Assessment methodology and enhanced processes to capture our sustainable and transition finance. In parallel, we will initiate a product development programme which will focus on the creation of innovative client solutions to support our clients' transition strategies.

In Retail, we are building on our achievements by expanding our mobile banking offering across the Group's MENA units. The launch of our "Blue App" in Egypt is part of a mega marketing campaign in April 2025, and we are on course to deliver Blue Apps in Tunisia and

Algeria during 2025, to make personal finance more efficient and inclusive. In parallel, we will actively review our green retail finance product offering to help our customers lead a more sustainable lifestyle.

Collaboration and innovation will remain the key drivers of our strategy and a critical area of focus for the Bank is accelerating sustainable finance through strategic partnerships. We aim to increase our focus on building high-impact relationships in 2025, as we emphasise client-focused initiatives that accelerate our provision of sustainable and transition finance. By working together with our partners, clients, and employees, we look forward to unlocking the full value of sustainability and making a meaningful impact.

Initiative	Description	Benefit
Sustainable finance product development programme.	<ul style="list-style-type: none"> • Acceleration of transition finance. • Product development for Corporate. • Product development for Retail. 	<ul style="list-style-type: none"> • Greater innovation. • Strengthen client relationship. • Generate revenue opportunities.
Training programme for business teams.	<ul style="list-style-type: none"> • Ongoing training and support programme. • Sharing of success stories. 	<ul style="list-style-type: none"> • Increase green skilling. • Promote idea sharing and innovation. • Increase job satisfaction. • Generate revenue opportunities.

We aim to increase our focus on building high-impact relationships in 2025, as we emphasise client-focused initiatives that accelerate our provision of sustainable and transition finance.



3.5: Our People and Communities



“We are committed to nurturing a diverse, performance-based, and growth-oriented work culture, which is essential for the Bank’s success and of every individual who becomes part of the ABC family. Mentoring our young staff is a cornerstone of this commitment, as it empowers them to build confidence and self-belief. By investing in their growth, we not only shape the future leaders of our organisation but also cultivate an environment where everyone feels valued and inspired to contribute their unique perspectives.”

Ehab AlMaskati
Group Head of Human Resources

Our People

Our Approach

At the core of Bank ABC’s operations and culture is fostering an inclusive and equitable workplace, ensuring that all colleagues are treated fairly, equally and with respect. This is fundamental to our success and dedication to delivering excellence to our customers and generating a positive impact on our communities.

We strive to attract and retain talent by nurturing a diverse equitable and inclusive environment and maintaining a culture that empowers individuals to reach their full potential.

Our strategy involves a data-driven approach to assess representation and establish plans to enhance diversity and inclusion across the organisation. Key indicators of any progress in gender equality include a higher proportion of women being promoted, a greater percentage of female external hires and a declining female employee turnover.

The Bank is also committed to supporting employee growth and development at every organisational level, regardless of gender. Aiding early career development, accelerating mid-level talent progression into leadership roles and identify opportunities for our leaders to grow into our most senior roles. While recognising that we are early in our journey and still have much more to do, we remain focused on creating a more diverse, equitable and inclusive culture.

Health & Safety

Bank ABC has put in place a structured and uniform process to implement Health and Safety (H&S) Procedures and is committed to high standards of health and safety across its global network. We encourage our employees to contribute to their own welfare and that of their colleagues. The overall objective of the Bank is to meet not only our legal responsibilities

but also our moral obligation to ensure the safety of employees and all those affected by our operations.

Our ultimate goals are to:

1. Provide and maintain a safe working environment that eliminates risks to health, safety and welfare.
2. Provide a safe environment for customers visiting our retail network or customers visiting our corporate offices.
3. Comply with relevant statutory requirements in respect of health, safety and the physical environment, as they affect employees, vendors, clients, public, business and reputation.
4. Safeguard employees and others from foreseeable hazards with regard to health, safety or the physical environment, in our processes and in working systems.
5. Ensure all employees and others under our control are provided with fit-for-purpose emergency response plans for sites they might visit.
6. Ensure that when any new technology, equipment or premises are introduced, adequate guidance, training and supervision are provided, and safety frameworks are developed.
7. Without detracting from a vendor's own legal responsibility, the Bank ensures that all vendors are informed of relevant requirements.

To ensure full implementation of our health and safety procedures across the Group several monitoring control processes have been applied. Global and Unit COOs are accountable for ensuring compliance with H&S procedures.



Health day at Head Office

Non-Discrimination

Bank ABC's approach to non-discrimination is set out within its Employee Relations policy. The document outlines the Group's policy to offer equal treatment to all job applicants and employees and not to discriminate on the grounds of race, colour, nationality ethnic or national origin, sex or marital status.



Cultural Awareness Day at Bank ABC London

There is non-discrimination in the Terms and Conditions of service offered to employees, and the sole criteria for selection or promotion is the suitability of the applicant for the job. Employees are expected to maintain high standards of work ethics, both in terms of their personal and professional conduct and performance. The practice of discrimination by an employee, at any level, will be regarded as a disciplinary offence dealt with under the disciplinary procedure. It also addresses cases of harassment of employees and customers with, setting out clearly defined disciplinary procedures.

Collective Bargaining Agreements

Bank ABC supports collective bargaining agreements in regions where these are regulatory expectations. Examples include the Bank’s Tunisian employees that are covered by collective bargaining agreements. This includes employee councils and representation to the business on a range of HR matters including staff remuneration.

Employee contracts for any potential candidates are offered based on the job grade and required skills to ensure that the offer is competitive enough to attract the right talent and retain internal equity. For existing employees, the Bank benchmark’s salaries against its peers at least every two years. Any salary adjustments are then proposed taking into consideration individual performance and overall Bank’s results.

Nationalisation

Bank ABC supports all relevant government nationalisation initiatives including the Bahrain Economic Vision 2030. The Bank increased the number of Bahraini employees in Bahrain, including ila Bank, Bank ABC Islamic and AFS businesses by 6.5% year-on-year in 2024. In line with the government’s nationalisation programme, we have a policy to hire Bahrainis and only hire non-Bahrainis when we have exhausted the option to hire locally. Non-Bahrainis are only hired at Assistant Vice President level, or above. We have also been active supporters of the Bahraini government’s Jobs Plus programme that looks to place unemployed Bahrainis back into full employment.

Child and Forced Labour

Bank ABC has a zero-tolerance approach to child and forced labour across all aspects of its value chain, including its own operations, supply chain and client activities. This is set out in Bank ABC’s Modern Slavery Statement and covers the Group.

The Bank is subject to modern slavery laws in various jurisdictions within which it operates, including the UK, where Bank ABC produces an annual modern slavery statement, and the EU, which has equivalent legislation in addition to recently passing a forced labour regulation. The Bank has further documents covering related areas such as a human rights positioning statement, aligned with industry best practice and explicitly addressing leading standards such as the UN Guiding Principles, OECD Due Diligence Guidance for Responsible Business Practice, ILO Labour Standards and UN Universal Declaration on Human Rights.

The Bank has a Vendor Code of Conduct (CoC) as part of its suite of Policy documents reviewed and approved at Board level. The Vendor CoC is uniformly adopted as a baseline across all locations and includes a section explicitly addressing modern slavery. 85% of our Bahrain head office suppliers have signed our Vendor Code of Conduct.

Human Rights

Bank ABC supports the Universal Declaration on Human Rights, as set out in its internal ESG Risk Standard. The Bank has set out a human rights positioning statement, in line with its values and industry best practice. This includes clearly defined roles and responsibilities across the organisation globally.

Bahraini employee representation (Bahrain entities only)	2023	2024	Change
Number of Bahrainis ¹	519	553	+6.5%
Bahrainis as a percentage of Bahrain-based workforce	55.9%	54.2%	-1.7pp

(1) Figures stated include Bahrain, Islamic Bank, ila and AFS.



Our Progress

Diversity, Equity & Inclusion

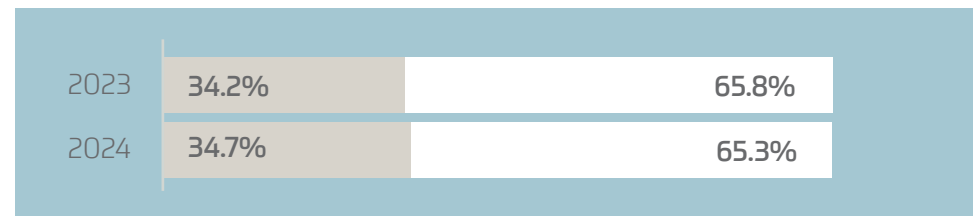
The Bank continues to accelerate its efforts to build a more diverse and inclusive workforce, broaden our talent pipeline and provide equal opportunities for growth at all levels. In 2024, we announced a 50% increase in maternity leave for Bank ABC’s Bahrain-based employees—extending it to 90 days, one month beyond the legal requirement.

Males/Females as a % of Full-Time Employees, Split by Grade

Total



Mid-Grade



Senior-Grade



Junior-Grade



■ FEMALE □ MALE

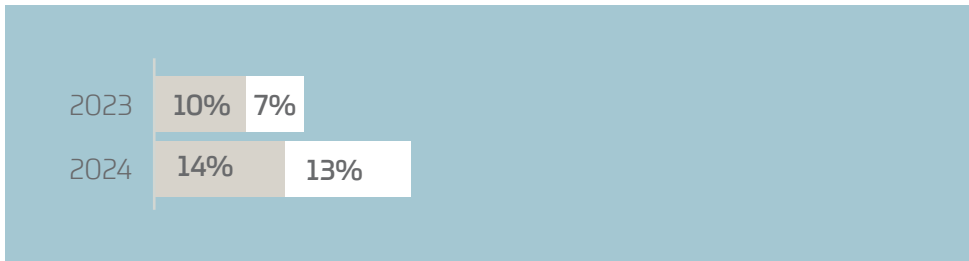
Females now make up 34% of Bank ABC’s total full-time employees, up marginally from 33.4% in 2023. There is also an increase in female representation at senior management level at 28.9% in 2024, from 27.3% in the previous year.

However, more needs to be done as female representation across all three grade levels remains low. Another positive trend was a rise in female representation at Board level; female members now account for 16% of all Board members across the Group’s Boards, an increase from 14% in 2023.

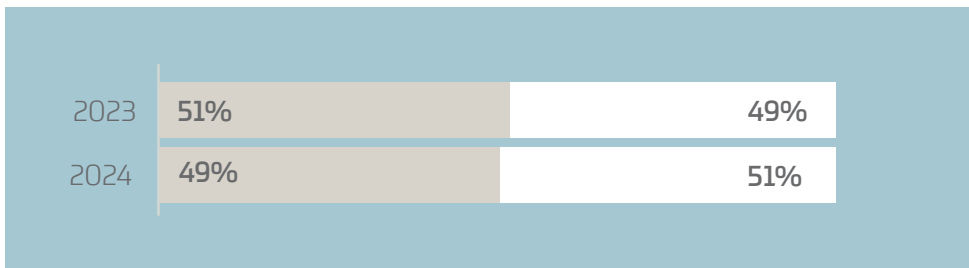
Gender Ratio of All ABC's Boards as % of Total Members



Total Male/Female Promotions as a % of Total Males/Females Employees



Interns by Gender as % of Total Interns



Internal Hires by Gender



External Hires by Gender

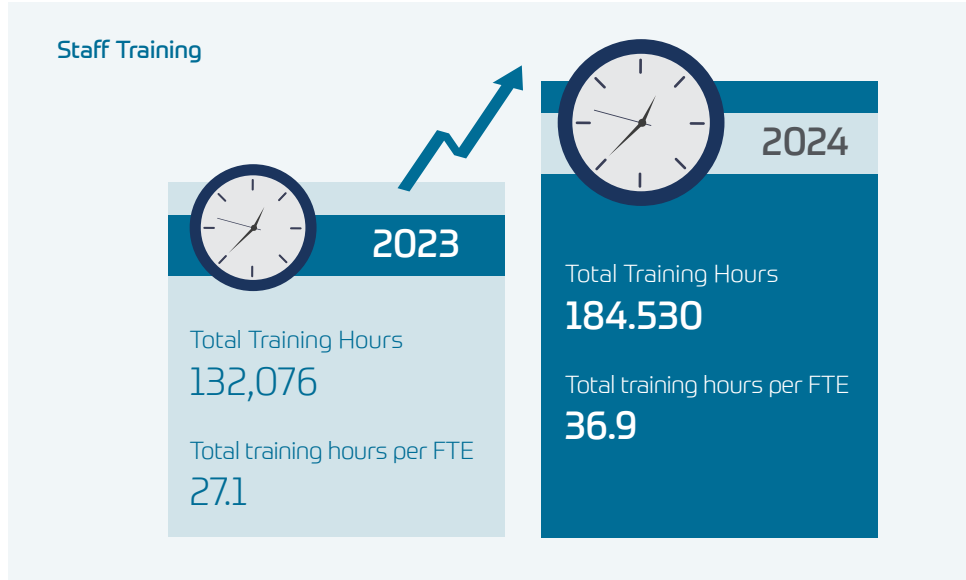


There were improvements in some of the lead indicating data. The number of female promotions as a percentage of total females across the Group rose to 14% in 2024, up from 10% in the previous year. Pleasingly, male promotions as a percentage of total male employees also rose to 13% in 2024. Meanwhile, female interns remain high at 51% of total interns during the year, a slight increase from 49% in 2023.

At the same time, we acknowledge further improvements are required as there were declines in other lead indicators. Internal female hires declined to 38% in 2024, from 40% in 2023 and the percentage of external female hires also fell marginally to 36% in 2024. Internal hires relates to all job openings that were filled by existing employees while external hires were those openings filled by external hires.



"Empower" Women Network in Bank ABC London Office



Career Development

There has been a concerted focus by the Bank on allocating more resources to developing our pipeline of talent at all levels. This is evidenced by a sharp rise in the total training hours to 35.8 hours per full-time employee (FTE) in 2024, up 35% from 26.5 hours in 2023.

- In 2024, Bank ABC launched **ABC Rise**, an initiative that provides employees with career development opportunities through skill-building workshops and structured programmes designed to enhance professional capabilities. This was launched with a **career development week** that involved external subject matter experts presenting industry trends and career opportunities across specialist areas.

Click on the image or scan the QR Code to watch Suzanne Stevens, Head Of People Development talk about various Career development initiatives at Bank ABC.

- A **management training programme** was launched in parallel, focused on strengthening the management skills required to support career development across the bank and create a fair and consistent management culture that values employees.
- A **mentorship programme** was introduced to support the expansion of our talent pipeline. This further strengthened the Bank's culture by fostering cross-organisational relationships, aligning 25 mentees with experienced mentors to support long-term growth. These mentoring sessions received positive feedback across the board, with comments such as: "The programme helped me resolve a range of issues related to work, engagement with senior leadership while boosting my self-confidence," and "Outstanding programme and impressive initiative from the Bank."
- Leadership development was also prioritised through the **Manager Skills programme**, which equipped leaders with critical skills in feedback, performance management, coaching, and leadership styles.
- The **Pathways to Excellence sponsorship programme** provided financial support for employees pursuing bachelor's and master's degrees. Additionally, Bank ABC advanced its well-being initiatives in 2024, offering support sessions, financial literacy workshops, and in-house health check-ups.

We are now looking to build on these initiatives to retain talent and broaden our talent pipeline.



Next Steps

Bank ABC remains steadfast preserving and promoting an inclusive working environment where all individuals are treated fairly, equally and with respect. We set up a working group to review our approach and set out initiatives to identify room for betterment and accelerate improvement. In parallel, we are expanding our career development programme with a focus

on soft skills such as emotional intelligence, collaboration and building resilience, all of which are essential skills for a rapidly changing environment. Our mentorship programme will be expanded, with an increased number of mentors to widen the opportunity to participate.

Initiative	Description	Benefit
Develop an action plan to strengthen Diversity, Equity & Inclusion.	<ul style="list-style-type: none"> Develop initiatives focused on improving our gender-related ESG KPIs. 	<ul style="list-style-type: none"> Avoid homogeneity and 'group think'. Lead to greater innovation and financial performance. Promote employee engagement, productivity and job satisfaction through inclusivity. Promote a culture of fairness.
Build employees' skills.	<ul style="list-style-type: none"> Expand mentoring programme and introduce new soft skills training modules. 	<ul style="list-style-type: none"> Increase access to the Bank's leadership. Futureproof employees' skills.

Our approach is aligned with our risk appetite and sets out metrics and thresholds to monitor those risks.



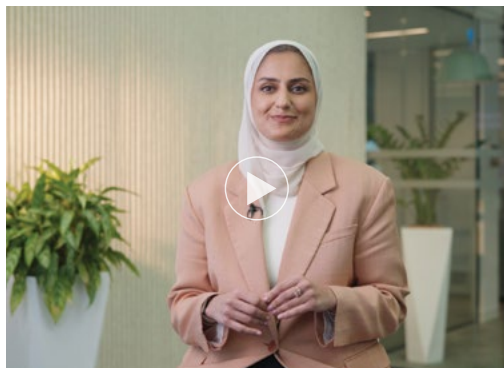
Our Communities

Our Approach

As a responsible corporate citizen, Bank ABC recognises the critical role it plays in developing and supporting its local communities. We adopt a holistic approach by generating our social impact through Group-wide philanthropic investments that are delivered through our corporate social responsibility (CSR) programme. This contributes towards greater inclusion and environmental resilience. Through community partnerships and employee volunteering, our CSR programme supports a wide range of projects and activities that address pressing social challenges and supports greater environmental stewardship.

Our Progress

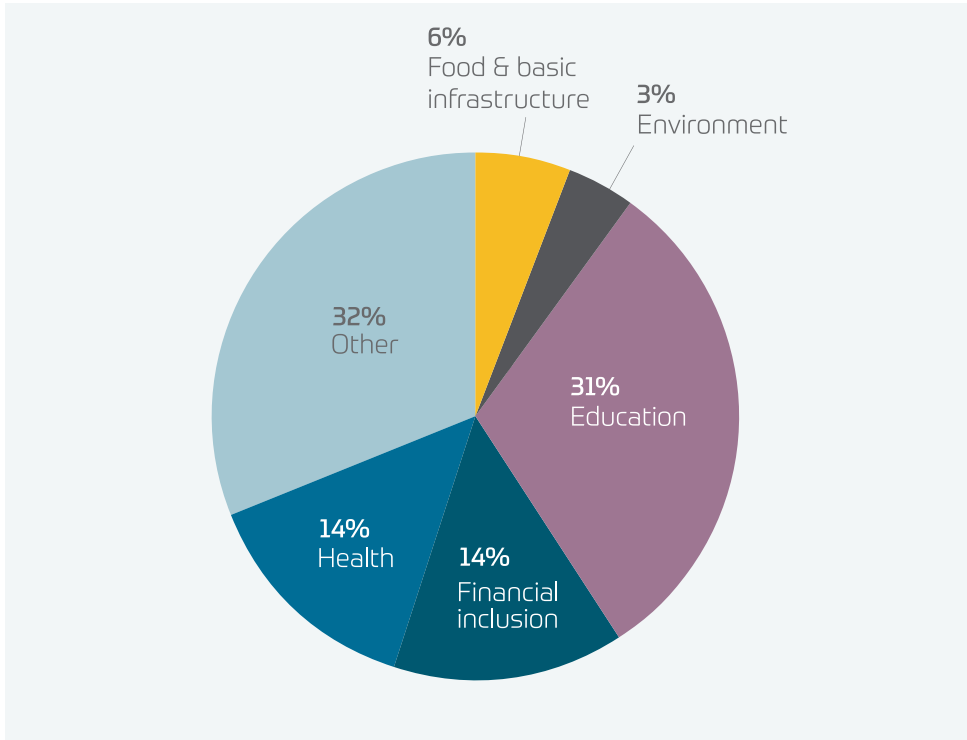
Bank ABC continued to promote positive change across its communities through fostering meaningful partnerships and volunteering opportunities. We donated US\$1.3 million to our communities in 2024, equivalent to 0.1% and 0.3% of our revenue and pre-tax profit, respectively. Donations were spread across 103 projects with 95% of our CSR investment in communities within the MENA region.



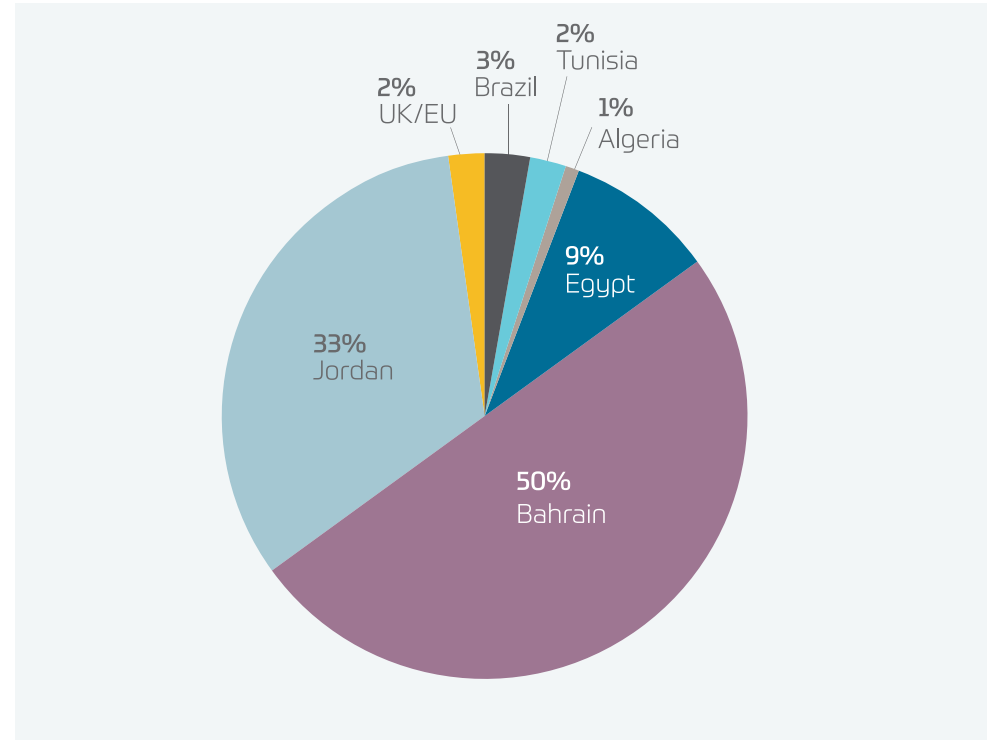
Click on the image or scan the QR code to watch Fatema Yusuf, Group Head of Corporate Communications, give an overview of the Bank's CSR efforts in 2024.



Total CSR Investment: Split by Category (% , 2024)



Total CSR Investment: Split by Geography (% , 2024)



Corporate Social Responsibility Highlights in 2024

Environment

1. Jordan - Supported the Royal Society for the Conservation of Nature's Climate Change Adaptation Programme, including a new desalination plant at Shaumari Wildlife Reserve and sustainability efforts at Al-Azraq Wetland.
2. UK - Team members volunteered with SPLASH to rebuild a children's adventure playground and improve wheelchair accessibility.
3. Bahrain – Contributed to the “Forever Green” afforestation campaign by National Initiative for Agricultural Development (NIAD) by planting of trees in the Diplomatic Area, supporting national environmental efforts.



Basic Infrastructure

1. Jordan - Participated in initiatives for the National Aid Fund in Jordan to support the most needy and impoverished families in the country.
2. Egypt - Partnered with Misr El Keir Foundation in Egypt to distribute 700 meals during Ramadan in underprivileged villages.
3. Tunisia - In collaboration with the 1955UniVersElle Association, Bank ABC offered more than 500 meals during Ramadan to the poor and the homeless.
4. Singapore - Our Singapore employees took part in the volunteer work at the charity organisation, Willing Hearts to prepare and deliver free meals to the needy in the community.



Forever Green Afforestation campaign in Bahrain



Ramadan Box distribution in Egypt



Misr EIKHEIR Iftar Scheme

Corporate Social Responsibility Highlights in 2024

Education

1. Jordan - Continued support to the Queen Rania Foundation for Education and Development, including parental care initiative of Al-Aman Fund for the Future of Orphans and “My Child’s First Years” programme.
2. Egypt – Supported MOSS, to help build a sustainable economic model aiming to empower 700 low-income women.
3. Egypt – Donated to the ATAA Fund to support community centres providing health care, training and development & for people with special needs.



Health and Wellbeing

1. Libya -Donated to Muntada Aid to support paediatric cardiac catheterisation missions in the country.
2. Jordan - Continued support for the Gift of Life Amman (GOLA) to provide life-saving heart surgeries for children with congenital heart defects.
3. Egypt - Supported 30 medical convoys to provide 6 months of support to 7,500 beneficiaries to remote locations.



Sponsoring a community project for students in Jordan



Bank ABC supporting Community School in Egypt



Donation made to Gift of Life Association Jordan

Corporate Social Responsibility Highlights in 2024

Financial Inclusion

1. Bahrain – Contributed to The Islamic Association, to supports families in need and provides sponsorships for higher education.
2. Bahrain – Supported the Hidd Charity Society, to supports underprivileged families and orphans.
3. Egypt - Hosted university students at the bank who lack parental care to develop their financial illiteracy through educational sessions provided by our financial inclusion team.

Other

1. Brazil - Employee driven initiative that helped raise funds for five cultural and educational projects that support vulnerable children and young adults.
2. USA - Staff joined the Project Sunshine volunteer event in New York to provide toys for sick children in long-term hospital stays.
3. Tunisia - Supported The Tunisian Association of SOS Children’s Villages and their work to support disadvantaged children and families.



Bank ABC Algeria supporting the elderly



Food parcels being handed out during Ramadan



Project Sunshine- New York

Next Steps

We remain focused on ensuring that our CSR investment generates long-lasting social and environmental impact for our communities. To further support this objective, we will review our strategic approach to CSR investment and develop a standardised approach to

measuring and evaluating potential investments. This will help us maximise the impact of our efforts in benefiting our communities.

Initiative	Description	Benefit
<p>Review our CSR investment strategy.</p>	<ul style="list-style-type: none"> Review our CSR investment strategy with a view to maximising its impact across our communities. 	<ul style="list-style-type: none"> Ensure investment is focused on projects that will deliver on objectives. Generate greater impact.



04

Appendices

Our footprint
In figures



Independent Limited Assurance Report



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 C.R. No. 29977

Independent practitioner’s assurance report

ARAB BANKING CORPORATION B.S.C.

Scope

We have been engaged by Bank ABC to perform a ‘limited assurance engagement,’ as defined by International Standards on Assurance Engagements, here after referred to as the engagement, to report on Bank ABC’s sustainability metrics in Annex A (the “Subject Matter”) contained in Bank ABC’s (the “Company’s”) 2024 Group Sustainability Disclosures Report for the year ended December 31, 2024 (the “Report”).

Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the Report, and accordingly, we do not express a conclusion on this information.

Criteria applied by Bank ABC

In preparing the sustainability metrics in Annex A, Bank ABC applied the Global Reporting Initiative (GRI) Standards (Criteria).

Bank ABC’s responsibilities

Bank ABC’s management is responsible for selecting the Criteria, and for presenting the sustainability metrics in Annex A in accordance with that Criteria, in all material respects. This responsibility includes establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the subject matter, such that it is free from material misstatement, whether due to fraud or error.

EY’s responsibilities

Our responsibility is to express a conclusion on the presentation of the Subject Matter based on the evidence we have obtained.

We conducted our engagement in accordance with the *International Standard on Assurance Engagements (ISAE 3000)*, and the terms of reference for this engagement as agreed with Bank ABC on April 21st, 2025. Those standards require that we plan and perform our engagement to express a conclusion on whether we are aware of any material modifications that need to be made to the Subject Matter in order for it to be in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusions.

Our independence and quality management

We have maintained our independence and confirm that we have met the requirements of the Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, and have the required competencies and experience to conduct this assurance engagement.

EY also applies International Standard on Quality Management 1, *Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services engagements*, which requires that we design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Description of procedures performed

Procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Although we considered the effectiveness of management’s internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the sustainability metrics in Annex A and related information, and applying analytical and other appropriate procedures.

Our procedures included:

- Engaged with the internal sustainability team, sampled subsidiaries companies relevant teams, and other relevant stakeholders during the assurance exercise.
- Conducted testing and analysis to assess the accuracy and reliability of the reported data.
- Evaluated the design and implementation of relevant internal controls.
- Reviewed the scope, boundary, methodologies and assumptions utilized for consistency and correctness of approach.
- Reported on any material misstatements or inconsistencies found in-scope.

We also performed such other procedures as we considered necessary in the circumstances.


Conclusion

Based on our procedures and the evidence obtained, we are not aware of any material modifications that should be made to sustainability metrics in Annex A, in order for it to be in accordance with the Criteria.

Restricted Use

The report is intended solely for the information and use of ARAB BANKING CORPORATION B.S.C. (Bank ABC) for the disclosures made in the Group Sustainability Disclosure Report (GSDR) for the year ended 31 December 2024 and is not intended to be, nor should be used by anyone other than Bank ABC.

for Ernst & Young - Middle East


 June 19th, 2025
 Manama, Bahrain



Annex A: Subject Matter

Sustainability Metrics ¹	2024 Values
Gender Diversity ²	34%
Energy Consumption (kWh per full-time employee) ³	4,809.70
Water Consumption (m ³ per full-time employee) ⁴	16.64
Scope 3 - Category 1 (tCO ₂ e) ⁵	18,945.40

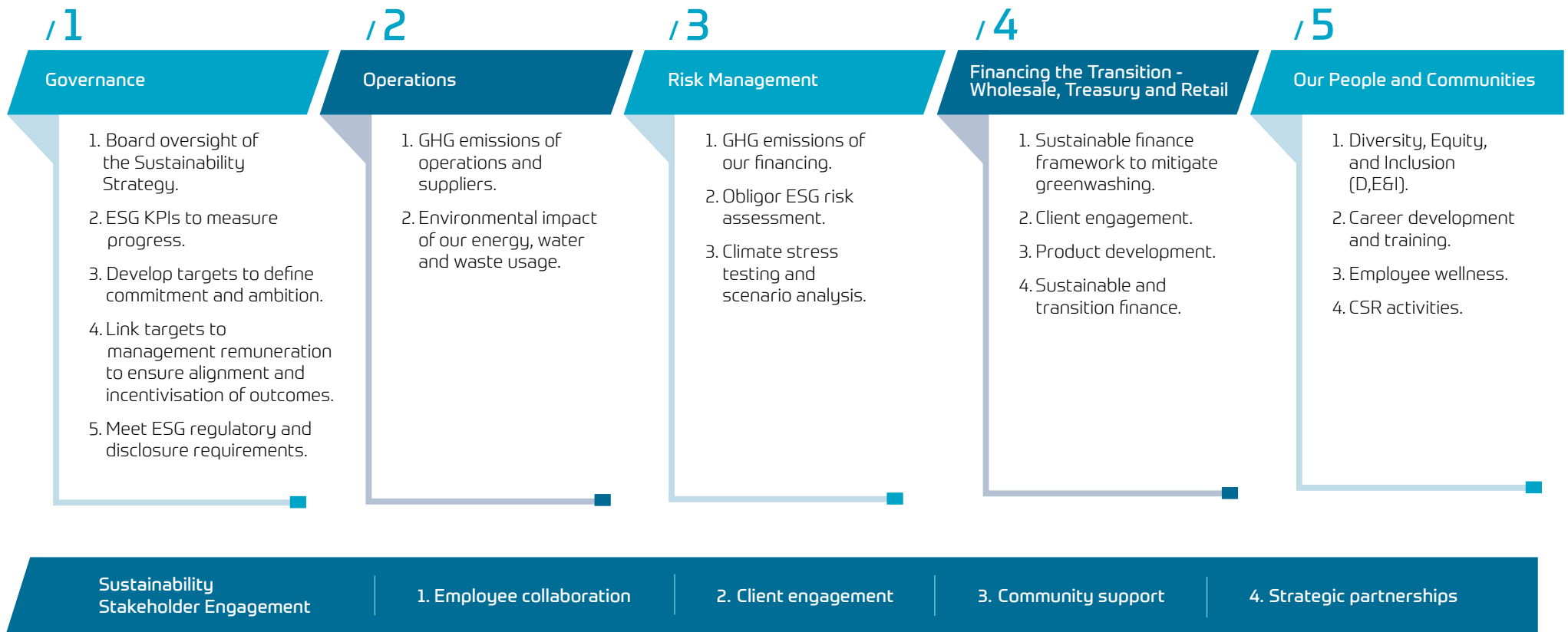
- (1) Full-time employees are those employed with a valid permanent contract as of December 31st, 2024.
- (2) Percentage of women of full-time employees.
- (3) Energy consumption per full-time employee.
- (4) Water consumption per full-time employee excluding subsidiaries of New York City (NYC) and Arab Financial Services LLC (AFS).
- (5) Spend-based emissions for purchased goods and services.

Appendix 1: Materiality Matrix

A materiality assessment is a strategic tool to evaluate a company’s material environmental and social impacts. It involves identifying, engaging and prioritising material sustainability issues based on stakeholder feedback and reporting frameworks such as the Task Force on Climate-Related Financial Disclosures (TCFD) and Sustainability Standards Board (SASB).

The process of developing Bank ABC’s sustainability strategy has involved extensive stakeholder engagement. Building understanding and support, while ensuring the participation of all Group Functions and geographical Units, was fundamental to maintaining an objective and independent evaluation process. Our materiality assessment was undertaken

to define and evaluate the material sustainability issues that were most important to Bank ABC and its stakeholders. This process involved a detailed gap analysis across all our Group Functions and Units. This was overlaid with a peer group analysis across all our jurisdictions – Asia, MENA, UK, Europe, US and Brazil – together with an evaluation of industry best practice. This comprehensive approach allowed for our material topics to be identified across our five strategic pillars: Governance, Operations, Risk Management, Financing the Transition and Our People and Communities.



Appendix 2: Basis of Reporting

General information

This report has been compiled for the period of the 1st of January, 2024 to the 31st of December, 2024. The purpose of the Group Sustainability Disclosures Report is to provide a standalone publication concerning Bank ABC's sustainability-related performance across key categories, in line with applicable regulatory expectations. The report considers consolidated performance across Bank ABC Group, headquartered in Bahrain. The scope includes all Bank ABC entities and geographies. It does not include consideration of third-party entity performance, such as individual suppliers, at this stage. The report was compiled by Bank ABC's Group Sustainability team.

Basis of preparation

The report has been created in line with prevailing industry standards which apply to Bank ABC entities. This includes the use of select GRI references, which focus on transparency and KPI disclosure, with limited consideration of TCFD expectations, which focus on the disclosure of climate-related risks and opportunities. The report utilises other frameworks including but not limited to the Greenhouse Gas Protocol (GHG Protocol), the UK's Streamlined Energy and Carbon Reporting (SECR), and UK DEFRA and US EPA emission factors, aligned with global IPCC literature. Consideration was given towards regulatory reporting expectations across all Bank ABC geographies. To ensure greater comparability between 2023 and 2024 data, some 2023 data have been restated from that published in our GSDR 2023. The report follows IFRS accounting principles and has been compiled to satisfy Central Bank of Bahrain ESG disclosure expectations.

Assumptions and estimates

As Bank ABC has a broad geographic footprint, it has been necessary to use assumptions and estimates. Operational data is collected quarterly and HR data semi-annually. In instances where the Bank has been unable to obtain data on the required cadence, a pro-rata approach has been used. For example, in Dubai, a water bill is only provided annually. This is divided into quarterly figures on a simple pro-rata basis.

Energy consumption

In instances where Bank ABC rent premises, energy and water may be included within the rental contract within multi-use buildings which lack sub-metering arrangements to account for ABC's consumption. In such instances, the Bank may rely on proxy information or assumptions. In other regions, utilities may bill periodically based on estimates, with bills based on actual figures as little as once per year. This may result in perceived differences in consumption over two periods reported, if one period is based on estimates and the next period is based on actuals which correct for the under or over-estimation(s) in the previous period.

Bank ABC employs energy grid GHG emission factors aligned with best available literature or local governmental figures for the period in question. For example, from using the UK's DEFRA database detailing emission factors for UK operations. Refrigerant leakage from heating and cooling systems is not recorded or estimated. Oil consumption from the testing of generators is recorded based on actual consumptions where applicable. Where the Bank rents accommodation for employees long term, the energy and water consumption are recorded within the Bank's reporting.

Electricity and water consumption

Electricity and water-related emissions are calculated in line with the approaches detailed in the Greenhouse Gas Protocol. Emission factors use official sources such as the UK's DEFRA database for respective countries reported.

Situations lacking billing

In situations where some bills cannot be obtained for a given month(s) in a given location, the most recent month's actual consumption shall be multiplied by the branch portfolio's average monthly change, to determine the modeled change in consumption accounting for seasonality. In instances where locations operate with top up meters, the top up amount shall be used to determine the consumption over a given period since the last top up and applied proportionately on a straight-line basis between top ups to determine monthly consumption. In countries where premises lack bills altogether, such as if the premises is rented with electricity and/or water bills included in the rent and there is no sub-metering, electricity and/or water consumption shall be determined from using the average monthly consumption from the total number of branches in the country in question. This excludes head office locations given these are not representative of branches. In examples where there are no other branches in the country, consumption shall be excluded as it cannot be determined.

Situations lacking consumption data

In instances where locations receive bills with no consumption units, consumption units shall be determined by using the prescribed price per unit from the respective provider. For locations where price per unit is unavailable from the provider, as is the case in certain MENA locations, consumption units from the closest available Bank location shall be used, to account for the fact that consumption units may vary regionally within a given country.

Solar arrangements

Where solar (photovoltaic) arrangements are involved, the electricity consumption for the building shall be determined using Primary Energy Demand, in other words, total electricity consumed for a given month irrespective of solar generation.

When it comes to subsequent location-based emission reporting, onsite solar directly consumed, such as from rooftop solar on a branch, shall be deducted from the total consumption, prior to multiplication with the emission factor. Offsite arrangements, such as from the use of a solar farm lacking a physical connection, shall not be deducted from location-based emissions. Such arrangements shall be captured under market-based emissions reporting, in line with the Greenhouse Gas Protocol.

In rare circumstances, energy billing to select locations may be received net of solar generation i.e. based on the residual consumption only. These bills also may only show the billing amount and not the units consumed, cost per unit nor gross amount of energy consumed (including solar).

In such circumstances, the Bank shall determine the units consumed by using the typical cost per unit for the residual balance. The Bank will separately have access to solar generation figures for all periods considered. The Bank will then combine the solar generation figures with the net consumption figures from the utility, to determine total consumption for the period in question. Transmission and distribution are not accounted.

Full Time Employees

Bank ABC uses full time employee (FTE) figures across both operational and HR categories. For operations, this includes aspects such as energy consumption on a per FTE basis. For the purposes of sustainability reporting, Bank ABC considers FTEs to be employees which work full time only. This excludes contractors, interns and part-time staff. Pro-rata FTE accounting is not used. Where a staff member transitions from being on a fixed term contract to permanent FTE during the year, the staff member shall be considered an FTE for the year in question.

Bank ABC's Staff are Distributed Across Regions as Follows: (FTEs per Region)

Entity	FTEs, FYE 2023	FTEs, FYE 2024
Group (Consolidated)	4,879	5,004
AFS	359	418
Algeria	418	463
Bahrain	569	603
Brazil	1,132	1,150
Egypt	1,259	1,206
France	35	36
Germany	35	39
Italy	27	27
Jordan	550	530
London	209	222
Singapore	14	16
Tunisia	201	220
Türkiye	9	9
UAE	16	16
USA	46	49

Purchased Goods and Services Emissions

The Bank is reviewing onboarding a global supply chain procurement system. In its absence, it has been necessary to use proxies when attempting to determine supply-chain related emissions and to apply current US EPA-related supply chain emission factors, based on IPCC figures. Information is collected from units on a quarterly basis. For approximately 50% of Bank ABC Group's supply chain spend, the Bank has been able to breakdown its procurement into a broad range of categories, using detailed EPA-derived emission factors for respective categories. In other instances, a single supply chain emission factor, based on the average emission factor from the locations where granular reporting was available, is used for all purchased goods and services across these units. All figures are based on embedded IPCC AR5 reporting, sourced from the latest iteration of an EPA database.

The Bank is deploying a spend-based methodology for FY25 with emissions by procurement category, across all categories for its' global footprint, with granular monthly internal reporting.

Emissions from purchased goods and services reported exclude activity-based emissions recorded elsewhere, such as for business travel and for office energy use, in order to avoid double counting. These figures are already captured as standalone categories within the Bank's emission reporting.

Business Travel and Commuting

The Bank continues to build its approach to data capture for business travel and employee commuting. As is common across international corporates such as Bank ABC, the Bank lacks specific information relating to employees' exact commuting details, such as vehicle type, emissions, distance travelled, and method of transport. It has therefore been necessary to make assumptions concerning elements such as employee mode of transport, vehicle emissions and distance of commute. Detailed information is recorded in limited regions including Singapore and Europe.

The Bank works with a variety of independent third parties for air travel bookings across its global footprint. Information historically provided to the Bank lacks details such as aircraft type, exact route information (such as stops or exact flight distance), and at times the airfare class which may materially impact the emission factor used. Assumptions utilising UK DEFRA aligned emission factors for business class flights have been used on a "best-efforts" basis concerning business travel, with a view to improving data capture through 2025.

Waste

The Bank works on the assumption of waste diverted from landfill being recycled by its recycling contractors. For example, it is assumed that 100% of plastic diverted from landfill is recycled. The Bank records both primary consumption figures and subsequent recycling-based emissions “above the line” with emission factors for each added, instead of the latter being deducted from the former. Emission factors are based on best available literature for individual waste categories, such as metals, paper and plastics. The Bank is actively working on a responsible sourcing strategy whereby information concerning source inputs will be available, such as whether paper used is from sustainably managed forests or made from recycled content.

In instances of units reporting partial waste figures only, these units shall be included in absolute reporting but omitted from per-FTE reporting in order to avoid the artificial skewing of performance. For example, as the Bank’s operations in Jordan built out their capacity in waste-related reporting, only a small subset was initially reported. Inclusion of such figures on an FTE basis would skew Group-wide reporting and artificially improve Group-wide waste per FTE performance.

Data Collection and Management

The Bank has used a wide variety of data sources to capture data for the 2024 sustainability report. Historically, standardised templates have been provided to relevant functions within subsidiaries/branches, including operations, HR, and client-facing teams to capture necessary information.

Work continues in 2025 to embed best practices systematically across the Bank and ensure timely data capture and reporting from units. This will include the creation of dashboards for management to monitor performance and trends. The Bank is also utilising internal systems such as Microsoft SharePoint to build out a data repository across locations. Data is currently limited to quarterly or half-yearly capture depending on the category, and relies on a mix of metered, modelled and estimated information. For example, in one North African country within which the Bank operates, it receives information relating to more than 75 branches. Some of these branches are owned, others are leased. Some are sole occupancy, others are not, and some lack specific information concerning the likes of energy and water consumption over a given period. Prudent estimates are used in such instances. The Bank is working on moving from quarterly towards monthly operational data reporting for 2025

Other Relevant Information

Bank ABC’s 2024 sustainability report has been subject to limited assurance from EY. This includes assessment of KPIs spanning select operational and HR figures. The report has been prepared in line with Central Bank of Bahrain (CBB’s) ESG reporting expectations, applicable from FY24 with reference to GRI and TCFD reporting principles. Forward looking statements have not been subject to assurance, nor do any sustainability statements contain financial projections interoperable with Bank ABC’s 2024 annual report.



Appendix 3: Data Tables

	Unit	2023	2024
1. HUMAN RESOURCES			
Parental Leave			
Number of days of male parental leave	Number	410	659
Number of days of female parental leave	Number	4,470	4,239
Bahraini Nationals (Scope: Bahrain-Based Employees Only)⁶			
Total number of Bahraini national FTEs based in Bahrain	Number	519	553
Bahraini nationals as % of Bahrain-based FTEs	%	56	54
Workforce Overview			
Total Employees	Number	5,673	6,102
Total FTEs	Number	4,879	5,004
Full-time employees	%	86	82
Part-time/contract employees ⁷	%	14	18
FTEs by Category⁸			
Senior management	%	8	10
Middle management	%	33	34
Non-management	%	59	57
FTEs by Age			
Employees age under 30	%	19	18
Employees age 30-50	%	67	67
Employees age +50	%	14	15
FTEs by Gender⁹			
Male	%	67	66
Female	%	33	34

(6) Includes Bahrain head office, AFS, Bank ABC's retail bank, "ila", and Bank ABC Islamic.

(7) Includes contractors and interns.

(8) FTEs are defined as per the basis of reporting on page 74.

(9) Figures assured by EY for FY24

	Unit	2023	2024
Female Representation by Grade			
Senior Management			
Male	%	73	71
Female	%	27	29
Mid-Grade			
Male	%	66	65
Female	%	34	35
Entry Level			
Male	%	66	66
Female	%	34	34
Internships by Gender			
Total number of internships during the year	Number	338	374
Male interns as a % of total	%	51	49
Female interns as a % of total	%	49	51
Gender Pay Gap¹⁰			
Gender pay gap ratio	%	10	11
Training			
Total training	Hours	132,076	184,530
Training per full-time employee (FTE)	Hours	27	37
Total Training Split by Category			
Mandatory	%	29	22
Technical	%	66	69
Leadership	%	2	4
Sustainability	%	2	4

(10) Calculated on a pro-rata, proportionate basis using a weighted average calculation applied to three levels of seniority bandings.

	Unit	2023	2024
Total Training Split by Employee Grade			
Senior management	%	5	8
Mid-grade	%	24	32
Entry level	%	71	60
Total Training Hours Split by Gender			
Male training hours as percentage of total hours worked	%	1.3	1.5
Female training hours as percentage of total hours worked	%	1.5	1.5
Total Training Hours Split by Contract Type			
Full-time employees (FTEs)	%	86	96
Part-time/contract	%	14	4
Employees Taking University Degree/Professional Qualification			
Total number of employees taking university degree/professional qualification	Number	266	291
Number of males taking university degree/professional qualification	Number	164	193
Males taking degrees/qualifications as % of total males	%	5	6
Number of females taking university degree/professional qualification	Number	102	98
Females taking degrees/qualifications as % of total females	%	6	6
Turnover			
Total employee turnover	%	12.1	17.1
Turnover by Gender			
Turnover of male employees	%	12.2	17.6
Turnover of female employees	%	11.8	16.1
Turnover by Age			
Turnover of employees aged under 30	%	16	26
Turnover of employees aged 50-31	%	11	15
Turnover of employees aged +50	%	12	12

	Unit	2023	2024
Absenteeism			
Employee absenteeism rate	%	3.1	3.9
Employee Wellness			
Amount invested in employee wellness activities	US\$,k	44	93
Number of employee wellness activities	Number	18	20
Health & Safety			
Total number of fatalities	Number	0	0
Total number of injuries	Number	17	24
Number of days lost due to injuries	Number	82	143
2. COMMUNITY INVESTMENT			
Community Investment			
Total community investment	US\$,m	5.1	1.3
Total community investment as a % of pre-tax profit	%	1.4	0.3
Total community investment as a % of revenues	%	0.4	0.1
Number of community projects	Number	52	103
Total Community Investment Split by Category			
% of community investment spent on basic infrastructure	%	78.7	5.6
% of community investment spent on environment	%	0.1	3.0
% of community investment spent on education	%	3.5	31.3
% of community investment spent on health	%	5.4	14.2
% of community investment spent on financial inclusion	%	2.7	14.4
% of community investment spent on other	%	9.6	31.5

	Unit	2023	2024
3. PROCUREMENT			
Procurement			
Total number of suppliers - Group	Number	2,446	2,607
Total number of suppliers - Head office	Number	639	592
Total Procurement Spending – Group	US\$,m	196	213
Total procurement spending – Bahrain	US\$,m	129	126
4. GOVERNANCE, COMPLIANCE & RISK			
Board of Directors			
Number of members of Group Board of Directors*	Number	9	9
Number of independent members of Group Board of Directors	Number	4	4
Non-executive members of Group Board of Directors	%	55	55
Female member of Group Board of Directors as % of total members	%	11	11
Female members of all ABC's Boards of Directors as % of total members	%	14	16
*The term of the Board of Directors is 3 years. The tenure of elected independent directors cannot exceed 3 consecutive terms, or 9 years in aggregate. There is no limit on the number of years that non-executive members can serve on the Board. The Board is comprised of 4 elected members and 5 appointed non-executive members.			

	Unit	2023	2024
Directors Code of Conduct		Yes	Yes
Board oversight of sustainability		Yes	Yes
Compliance			
Number of regulatory breaches that were intentional or due to gross negligence	Number	0	0
Number of hours of training on Code of Conduct and Whistleblowing	Hrs/FTE	2	4
Cyber Security			
Data Security Breaches			
Number of data security breaches	Number	0	0
Number of account holders impacted	Number	0	0
% of employees that completed ABC's data security training	%	99	99
5. ENVIRONMENTAL PERFORMANCE			
Energy			
Electricity consumption	MWh	25,040	24,068
Electricity consumption per FTE ⁽¹¹⁾	MWh/FTE	5.1	4.8
Renewable energy as % of total energy	%	17.1	15.9
GHG Emissions			
Scope 1	t CO ₂ e	1,340	1,297
Scope 2 – location-based	t CO ₂ e	10,572	10,160
Scope 2 – market-based	t CO ₂ e	8,768	8,541
Scope 3 (excluding financed emissions)	t CO ₂ e	31,565	31,889
Total GHG emissions (Scope 1, 2 & 3) – location-based	t CO ₂ e	43,476	43,346
Total GHG emissions (Scope 1, 2 & 3) – market-based	t CO ₂ e	41,673	41,727
Total GHG emission intensity – per unit of revenue	t CO ₂ e / \$m revenue	34.0	32.4
Total GHG emissions per FTE – location-based	t CO ₂ e / FTE	8.9	8.7
Total GHG emissions per FTE – market-based	t CO ₂ e / FTE	8.5	8.3
Breakdown of Total GHG Emissions (Scope 1, 2 & 3) by Category			
% of GHG emissions from owned buildings and fleet (Scope 1)	%	3.1%	3.0%

(11) FTEs defined as permanent full time employees only. For more information, see page 74.

	Unit	2023	2024
% of GHG emissions from electricity (Scope 2)	%	24.3%	23.4%
% of GHG emissions from suppliers (Scope 3)	%	45.4%	43.7%
% of GHG emissions from commuting & business travel (Scope 3)	%	22.8%	29.6%
% of GHG emissions from waste & water (Scope 3)	%	0.2%	0.3%
Water Consumption			
Total water consumption	m ³	106,743	75,510 ¹⁴
Water consumption per FTE ¹²	m ³ /FTE	23.9	16.6
Waste Consumption			
Total waste	t	162.5	237.4
Waste per FTE ¹³	kg / FTE	67.9	55.9
Waste to landfill	t	97.6	156.8
Waste to landfill per FTE	kg / FTE	40.8	36.9
Waste to landfill as % of total waste	%	60	66
Waste diverted from landfill	t	64.9	80.6
Diverted waste as % of total waste	%	40	34
Breakdown of Recycled Waste			
Recycled paper as % of total recycled waste	%	57%	88%
Recycled plastic as % of total recycled waste	%	36%	7%
Recycled cardboard as % of total recycled waste	%	5%	4%
Recycled metal as % of total recycled waste	%	2%	1%
Paper Consumption			
Paper consumption	t	156	144
Recycled paper as % of total paper consumption	%	24%	49%

(12) FTE figures exclude New York and AFS for 2023 and 2024. FTEs defined as permanent full time employees only. For more information, see page 74.

(13) FTE figures exclude AFS, Istanbul, Milan, New York, Paris and Tunisia for 2023 and 2024. Jordan and Egypt are excluded in 2023 only.

(14) Reduction attributable to combination of reduced consumption alongside revised, more granular calculation methodology employed for 2024.

Appendix 4: Governance Committee and Steering Groups with Responsibility for Sustainability-Related Issues

Governance body	Chairperson	Sustainability-related agenda frequency	Purpose and responsibilities to sustainability-related issues
Group Board	Group Chairman	Ad hoc	<ul style="list-style-type: none"> Oversees the Group’s sustainability strategy, risk appetite and culture.
Board Risk Committee (BRC)	Independent non-Executive Director	Quarterly	<ul style="list-style-type: none"> Provide oversight of the Group’s key risks on behalf the Board and is the primary risk committee at the Board level that oversees ESG risk. Consider the Group’s risk appetite and make recommendations to the Board on the risk appetite statement. Ensure that Risks - including ESG risks - are identified, measured, mitigated, monitored and reported. Review and approve stress testing (which includes climate scenarios) results.
Group Risk Committee (GRC)	Group CEO	Quarterly	<ul style="list-style-type: none"> Recommend/approve relevant ESG related Policies & Standards in support of the Sustainability Strategy. Provide oversight regarding the management of key risks (including ESG risks) across the Group through its sub-committees which report into it. Review risk appetite and approve management team level risk appetite metrics and thresholds for principal risk types, including ESG risk.
Sustainability Steering Committee (SSC)	Group CEO	Quarterly	<ul style="list-style-type: none"> Review and monitor the implementation of the Group Sustainability Strategy. Review and monitor the material ESG KPIs and oversee the development of targets. Oversight of the sustainability risk controls and risk appetite. Ensure Bank ABC can meet its ESG regulatory and disclosure requirements across its jurisdictions.
Sustainable Finance Forum (SFF)*	*SFF to be set up in 2H25	Quarterly	<ul style="list-style-type: none"> Provides oversight of the Group Sustainable Finance Framework, sustainable finance products and how sustainable assets and liabilities are managed and verified. Reviews the annual Sustainable Finance Report.

Appendix 5: GRI Standards Content Index

Bank ABC Group has reported the information set out in this Global Reporting Initiative (GRI) Content Index for the period 1st of January to 31st December 2024 with reference to the GRI Standards. This has been done based on the requirements laid out in GRI 1: Foundation

2021. The disclosures related to the respective GRI Standards have been referenced in the Index below. In some instance, information could not be provided due to the limitations of data availability.

GRI Standard	Disclosure Number and Title	Reference
GRI 301: Materials 2016		
GRI 3: Materials Topics 2021	3-3 Management of material topics	Page 72
Materials	301-1 material used by weight or volume	Pages 34-35
GRI 302: Energy 2016		
GRI 3: Materials Topics 2021	3-3 Management of material topics	Page 72
Energy	302-1 Energy consumption within the organisation	Pages 33; 81
	2-302 Energy consumption outside the organisation	Pages 33; 81
	302-3 Energy intensity	Pages 33; 81
	4-302 Reduction of energy consumption	Pages 18; 31
GRI 305: Emissions 2016		
GRI 3: Materials Topics 2021	3-3 Management of material topics	Page 72
Emissions	305-1 Direct (Scope 1) GHG emissions	Pages 30-32; 81
	305-2 Indirect (Scope 2) GHG emissions	Pages 31-32; 81-82
	305-3 Other indirect (Scope 3) GHG emissions	Pages 31-32; 42; 81-82
	305-4 GHG emissions intensity	Pages 30; 32; 81
	5-305 Reduction of GHG emissions	Pages 18; 26-28; 42
GRI 401: Employment 2016		
GRI 3: Materials Topics 2021	3-3 Management of material topics	Page 72
Employment	401-1 New employee hires and turnover	Pages 56; 78
	401-2 Benefits provided to full-time employees	-
	3-401 Parental leave	Page 76
GRIS 404: Training and Education 2016		
GRI 3: Materials Topics 2021	3-3 Management of material topics	Page 72
Training and education	1-404 Average hours of training per employee	Pages 61; 77-78
	2-404 Programme for upgrading employee skills and transition assistance programmes	Pages 61-62
	3-404 Percentage of employees receiving regular performance and career development reviews	-

GRI Standard	Disclosure Number and Title	Reference
GRI 405: Diversity and Equal Opportunity		
GRI 3: Materials Topics 2021	3-3 Management of material topics	Pages 59-60; 72
Diversity and equal opportunity	405-1 Diversity of governance bodies and employees	Pages 59-60; 80
	405-2 Ratio of basic salary and remuneration of women to men	Page 77
GRI 406: Non-Discrimination 2016		
GRI 3: Materials Topics 2021	3-3 Management of material topics	Pages 57; 72
Non-discrimination	406-1 Incidents of discrimination and corrective actions taken	-
GRI 414: Supplier Social Assessment 2016		
GRI 3: Materials Topics 2021	3-3 Management of material topics	Page 72
Supplier social assessment	414-1 New suppliers that were screened using social criteria	Page 58
	414-2 Negative social impacts in the supply chain and actions taken	-
GRI 417: Marketing and Labelling 2016		
GRI 3: Materials Topics 2021	3-3 Management of material topics	-
Marketing and labelling	417-1 Requirements for product and service information and labelling	-
	417-2 Incidents of non-compliance concerning product and service information and labelling	-
	417-3 Incidents of non-compliance concerning marketing communication	-
GRI 418: Customer Privacy 2016		
GRI 3: Materials Topics 2021	3-3 Management of material topics	Page 29
Customer privacy	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Page 81

Appendix 6 : CBB ESG disclosure requirements

Bank ABC Group has reported the information for the period 1st of January to 31st December 2024 in accordance with Central Bank of Bahrain's (CBB) ESG disclosure requirements. The disclosures related to the respective CBB's ESG disclosure requirements have been referenced

in the Index below. In some instance, information could not be provided due to the limitations of data availability.

CBB KPI	Reference	Reference framework (if applicable)
E.1: Environmental Oversight	Pages 17-20; 26-28; 83	GRI 3-3
E.2: Energy Consumption	Pages 33; 73	GRI 302
E.3: Energy Intensity	Pages 33; 73	GRI 302
E.4: Energy Mix	Page 33	GRI 302
E.5: Greenhouse Gas Emissions	Pages 31-32; 73-74; 81-82	GHG Protocol; GRI 305; DEFRA; US EPA
E.6: Emissions Intensity	Pages 32; 73-74; 81-82	GHG Protocol; GRI 305; DEFRA; US EPA
E.7: Climate Risk	Pages 29-42	TCFD
E.8: Water Usage	Pages 34; 82	GRI 303
E.9: Waste Generation	Pages 34-35; 73-75; 82	GRI 306
E.10: Emission Targets	Pages 18; 26-28; 42	GRI 3; GRI 305
S.1: Total Workforce	Pages 59-60; 74; 76-77	GRI 2; GRI 405
S.2: Child and Forced Labour	Page 58	GRI 2; GRI 405
S.3: Employee Turnover	Page 78	GRI 401
S.4: Gender Pay Gap	Page 77	GRI 405
S.5: Health and Safety	Pages 56-57; 79	GRI 403
S.6: Non-Discrimination	Page 57	GRI 406

CBB KPI	Reference	Reference framework (if applicable)
S.7: Nationalisation	Page 58	GRI 406
S.8: Community Investment	Pages 63-68; 79	GRI 3
S.9: Human Rights	Page 58	GRI 412
S.10: Management Composition	Pages 59-60; 76-77	GRI 405
S.11: Development and Training	Pages 77-78	GRI 404
G.1: Board Composition	Page 80	GRI 2
G.2: Collective Bargaining	Page 58	GRI 407
G.3: Whistleblowing	Pages 27; 81	GRI 2
G.4: Data Privacy	Page 30	GRI 2
G.5: Disclosure Practices	Pages 5; 45; 63-68; 73	GRI 2
G.6: Conflict of Interest	Page 27	GRI 2
G.7: Supplier Code of Conduct	Page 58	GRI 2
G.8: Incentivised Pay	Page 28	GRI 2
G.9: Ethics & Anti-corruption	Pages 26-28	GRI 2
G.10: Assurance	Pages 5; 70-71	GRI 2

An aerial photograph of a large, calm lake with deep blue water. The left edge shows a lush, green forested shoreline with some rocky outcrops. A prominent white diagonal line pattern, consisting of many thin, parallel lines, runs horizontally across the middle of the lake. The text 'bank-abc.com' is centered within this white pattern.

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