

Facing Finance e.V. / Schönhauser Allee 141 / HH 2 / 10437 Berlin

An die Mitglieder des Finanzausschusses des
Schleswig-Holsteinischen Landtages

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Sehr geehrte Damen und Herren, sehr geehrter Herr Weber,

anbei unsere schriftliche Stellungnahme zum Entwurf eines Gesetzes zur Regelung der Finanzanlagestrategie Nachhaltigkeit in Schleswig-Holstein, Gesetzentwurf der Landesregierung, Drucksache 19/2473.

Grundsätzlich ist das Gesetzesvorhaben des Landes Schleswig-Holstein zur Einführung einer nachhaltigen Finanzstrategie zu begrüßen. Wir stimmen der im Gesetzesentwurf geäußerten Einschätzung zu, dass es trotz zahlreicher Bemühungen auf verschiedenen politischen Ebenen bis dato keine universell anwendbare und einheitliche Definition von Nachhaltigkeitskriterien in der Finanzwirtschaft gibt und dass diese aber zwingend notwendig wäre, um notwendige Nachhaltigkeitsziele zu erreichen. „Nachhaltigkeitsiegel“ sind u.a. auch deshalb kein verlässlicher Gradmesser.

Die beabsichtigte Anwendung des *Best-In-Class* Ansatzes [§ 4 Nachhaltigkeit (4)], ist unserer Auffassung nach wenig geeignet Nachhaltigkeit sicherzustellen, da dieses Verfahren Beteiligungen an (klima-) schädlichen Geschäftsmodellen, die gegen fundamentale soziale und ökologische Standards verstoßen, grundsätzlich akzeptiert. Somit werden die im Gesetzentwurf formulierten Ziele des Vorhabens verwässert.

Ziel von Nachhaltigkeitsstrategien darf unserer Auffassung nach nicht nur „...die (Um-)Lenkung von Kapitalströmen in diejenigen Unternehmen und Staaten, die sich in diesen Bereichen verantwortungsvoll zeigen...“ sein (S.2). Vorrangiges Ziel muss es vielmehr sein, dass Finanzanlagen nicht von unternehmerischen Tätigkeiten profitieren, die Verträgen und völkerrechtlichen Verpflichtungen entgegenstehen, die Staaten wie die Bundesrepublik Deutschland unterzeichnet/ratifiziert haben und die im Widerspruch zu Standards des Umwelt- und Klimaschutzes oder den Menschenrechten stehen.

In Bezug auf Menschenrechte (S.9) wird in der Begründung (S.23) nur auf den *UN Global Compact* abgestellt. Dieser Minimal-Standard ist unverbindlich, wird nicht kontrolliert, ist wenig akzeptiert und wird häufig missbraucht (blue washing). Grundsätzlich fehlt eine angemessene Definition. Idealerweise sollten Menschenrechte im Sinne der *United Nations Guiding Principles on Business and Human Rights* definiert werden.

Grundsätzlich begrüßen wir den Ausschluss der Geschäftsfelder fossile Brennstoffe und Atomenergie [§ 4 Nachhaltigkeit (3) 1 und 2], wobei u.E. auch die Hersteller von Atomanlagen auszuschließen sind.

In Bezug auf Waffen begrüßen wir den Ausschluss von ABC-Waffen, Landminen und Streumunition. In Bezug auf Atomwaffen sollte die Formulierung jedoch um den Atomwaffenverbotsvertrag (Treaty on the Prohibition of Nuclear Weapons, TPNW) ergänzt werden.

Außerdem sollte der Paragraph 4 *Nachhaltigkeit* einen Ausschluss von Unternehmen enthalten, die an der Entwicklung und Herstellung von autonomen Waffensystemen beteiligt sind, die ohne menschliche Kontrolle Ziele erfassen und zerstören können. Dies steht im Widerspruch zu geltendem Völkerrecht.

Des weiteren sollte der Paragraph 4 *Nachhaltigkeit* einen Ausschluss von Unternehmen enthalten, die Waffen an kriegführende Staaten bzw. in Kriegsgebiete liefern, weil dies einen Verstoß gegen den *Vertrag* über den Waffenhandel (The Arms Trade Treaty, ATT) darstellt. Zudem zählen laut UNO neben dem **Klimawandel** - verursacht durch fossile

Eingetragen beim Amtsgericht Berlin-Charlottenburg, Nr. VR32177B

Vorstand i. S. d. § 26 BGB (einzelvertretungsberechtigt): Thomas Küchenmeister, Vorsitzender;
Jan Schulz, stellv. Vorsitzende; Julia Dubsclaff, stellv. Vorsitzende

Energie - **militärische Konflikte** – ermöglicht durch Waffenexporte - zu den Hauptfluchtursachen. Dies sollte allein deshalb unbedingt zu einem vollständigen Ausschluss dieser beiden Geschäftsfelder führen.

Wir begrüßen ausdrücklich den Willen des Landes Schleswig-Holstein Finanzanlagen von Staaten auszuschließen, die in ihrem Rechtssystem die Todesstrafe systematisch anwenden. Wir schlagen aber vor, diesen Ausschluss um Staaten zu erweitern, in denen es zu fortdauernden und systematischen Menschenrechtsverletzungen kommt [§ 4 Nachhaltigkeit (2)].

Im Vergleich zu 16 Geldinstituten, deren veröffentlichte Selbstverpflichtungen wir anhand von [über 280 Kriterien](#) in Bezug auf ihre Übereinstimmung mit internationalen Nachhaltigkeitsstandards im Rahmen unseres Projektes [Fair Finance Guide Deutschland \(FFG\)](#) überprüfen, erfüllt der Gesetzentwurf lediglich zu 15% die Anforderungen und würde den letzten Platz im [Ranking](#) einnehmen (s. Anhang).

Themes	Content of policy	Scope of policy (%)	Total scores
<i>Cross-cutting themes</i>			
Climate change	2,7	1	2,7
Corruption	0		0
Gender equality	0		0
Human rights	4,2	0,9	3,8
Labour rights	0		0
Nature	0		0
Taxes	0		0
<i>Sector themes</i>			
Arms	4	1	4
Food	0		0
Forestry	0		0
Mining	1,2	1	1,2
Oil & Gas	10	1	10
Power generation	1	1	1
<i>Operational themes</i>			
Remuneration	0		0
Transparency & Accountability	0		0
Average Score (International)			1,5
Average Score (Schleswig Holstein)			15%

Grundsätzlich bewerten wir den Gesetzentwurf aber als wichtige, erste Orientierung für Entscheidungsträger*innen bei der operativen Umsetzung der nachhaltigen Finanzanlage. Dem Anspruch einer vollumfänglichen, dringend notwendigen Beachtung wichtiger sozialer und ökologischer Standards und Normen, genügt der Gesetzentwurf jedoch noch nicht.

Für einen weiteren Dialog stehen wir sehr gern zur Verfügung und verbleiben mit freundlichen Grüßen,

Thomas Küchenmeister

Geschäftsführender Vorstand

Overview of scores

This table contains formulas, do not adjust manually! Only fill in the other worksheets.

Themes	Baseline study		
	Content of policy	Scope of policy (%)	Total scores
<i>Cross-cutting themes</i>			
Climate change	2,7	1,0	2,7
Corruption	0,0		0,0
Gender equality	0,0		0,0
Human rights	4,2	0,9	3,8
Labour rights	0,0		0,0
Nature	0,0		0,0
Taxes	0,0		0,0
<i>Sector themes</i>			
Arms	4,0	1,0	4,0
Food	0,0		0,0
Forestry	0,0		0,0
Mining	1,2	1,0	1,2
Oil & Gas	10,0	1,0	10,0
Power generation	1,0	1,0	1,0
<i>Operational themes</i>			
Remuneration	0,0		0,0
Transparency & Accountability	0,0		0,0
Average Score (International)			1,5
Average Score (Germany)			15%


This file presents the Tool that is used to assess finance and investment policies based on the Fair Finance Guide International (FFGI) Methodology for Policy Assessment 2020. Please read the document FFGI Methodology 2020 for clarification on assessment elements and the scoring model.

Relevancy of investment and finance categories / products

Investment category, financial product or service	Relevant? (Yes/No)	Provided by [name subsidiary(ies) or associate(s) within group]	Source	If not active, please clarify	Feedback from financial institution	Response from analyst
Corporate credits	no					
Project finance	no					
Asset management for own account	yes					
Asset management for the account of clients	no					

Documents used		Document applicable to scope category? (yes/no/c-b-c)				Applied standards and initiatives		Standard applicable to scope category? (yes/no)											
Assessed documents and websites	New version since last update? (yes/no)	Corporate credits	Project finance	Asset management own account	Asset management for account clients	Clarification on applicability	Feedback from financial institution	Response from analyst	Names automated scoring standards	Yes / No	Corporate credits	Project finance	Asset management own account	Asset management for account clients	Applied to own operations? (yes/no)	Source	Clarification	Feedback from financial institution	Response from analyst
Entwurf eines Gesetzes zur Regelung der Finanzanlagestrategie Nachhaltigkeit in Schleswig-Holstein																			
									Names other relevant standards and initiatives mentioned in policies										

Assessment elements		Baseline study													
Elements 'Climate Change'	Repeated	Applied standards and initiatives	Content of policy	Corporate credits	Project finance	Asset management own account	Asset management for account clients	Scope of policy	Score per element	Policy document(s)	Notes and quotes (draft assessment)	Question to financial institution	Feedback from financial institution	Response from analyst	Notes and quotes (final assessment)
1			0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
2			0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
<i>The following elements are crucial for a policy regarding the financial institution's management of its portfolio of corporate loans and investments:</i>															
3			0	n.a.	n.a.	0	n.a.	0%	0,0						
4			0	n.a.	n.a.	0	n.a.	0%	0,0						
5			0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
6			0	n.a.	n.a.	0	n.a.	0%	0,0						
7			0	n.a.	n.a.	0	n.a.	0%	0,0						
8			1	n.a.	n.a.	1	n.a.	100%	1,0		sufficient as there is an exclusion of fossil fuel companies, see element 8				
9			1	n.a.	n.a.	1	n.a.	100%	1,0		see element 8				
10			1	n.a.	n.a.	1	n.a.	100%	1,0		see element 8				
11			1	n.a.	n.a.	1	n.a.	100%	1,0		see element 8				
<i>The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:</i>															
12			0	0	n.a.	n.a.	0	n.a.	0%	0,0					
13		Food 14	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
14			0	0	n.a.	n.a.	0	n.a.	0%	0,0					
15			0	0	n.a.	n.a.	0	n.a.	0%	0,0					
16		Power gen. 5	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
17		Power gen. 6	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
18		Mining 27	1	1	n.a.	n.a.	1	n.a.	100%	1,0		see element 8			

19	Extracting oil from tar sands is unacceptable.	<i>Oil&Gas 20</i>	1	n.a.	n.a.	1	n.a.	100%	1,0	see element 8	
20	Extracting oil and gas is unacceptable.		1	n.a.	n.a.	1	n.a.	100%	1,0	see element 8	
21	Conversion of peatland and high-carbon stocks for agricultural development is unacceptable.	<i>Food 16</i>	0	n.a.	n.a.	0	n.a.	0%	0,0		
22	The production of biomaterials complies with the 12 principles of the Roundtable on Sustainable Biomaterials (RSB).	<i>Power gen. 17</i>	0	n.a.	n.a.	0	n.a.	0%	0,0		
23	CO2-compensation is certified according to the criteria of relevant certification schemes for CO2 compensation (mentioned in section 2.2.2).		0	n.a.	n.a.	0	n.a.	0%	0,0		
24	Companies do not participate in lobbying (attempting to influence decisions made by regulators) aimed at weakening climate policy.		0	n.a.	n.a.	0	n.a.	0%	0,0		
25	Companies integrate climate change criteria in their procurement and operational policies.		0	n.a.	n.a.	0	n.a.	0%	0,0		
26	Companies include clauses on the compliance with criteria on climate change in their contracts with subcontractors and suppliers.		0	n.a.	n.a.	0	n.a.	0%	0,0		
Total scores			2,7					100%	2,7		
Total scores expressed as percentage			27%						27%		

X: Companies active in the energy sector include the power generation companies itself and the companies involved in producing the sources of energy, including coal, oil, gas, solar, wind, geothermal, nuclear, hydro, biomass, and tidal
XI: Examples of thresholds mentioned in policies: revenues, electricity generated, installed capacity, and utilized capacity

Assessment elements		Baseline study													
Elements 'Corruption'	Repeated	Applied standards and initiatives	Content of policy	Baseline study				Scope of policy	Score per element	Policy document(s)	Notes and quotes (draft assessment)	Question to financial institution	Feedback from financial institution	Response from analyst	Notes and quotes (final assessment)
				Corporate credits	Project finance	Asset management own account	Asset management for account clients								
<i>The following elements are crucial for a policy regarding the financial institution's internal operations:</i>															
1	Offering, promising, giving and requiring, either directly or indirectly, bribes and other undue advantages in order to acquire and to maintain assignments and other undue advantages, is unacceptable.		0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
2	The financial institution has an anti-money laundering policy.		0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
3	The financial institution has a policy to prevent terrorist financing and financing of proliferation.		0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
4	The financial institution properly verifies the ultimate beneficial owner(s) of a company.		0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
5	The financial institution applies additional safeguards when it enters into indirect or direct business relations with Politically Exposed Persons.		0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
6	The financial institution reports on its participation in the decision-making processes of international norms and legislation (lobby practices).		0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
<i>The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:</i>															
7	Companies publicly disclose their ultimate beneficial owner or owners including full name, date of birth, nationality, jurisdiction of residence, number and categories of shares, and if applicable the proportion of		0	n.a.	n.a.	0	n.a.	0%	0,0						
8	Offering, promising, giving and requiring, either directly or indirectly, bribes and other undue advantages in order to acquire and to maintain assignments and other undue advantages, is unacceptable.	Mining 20; Oil&Gas 18	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
9	Companies have a management system which results in immediate actions if suspicions arise that employees or suppliers are guilty of corruption.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
10	Companies report on their participation in the decision-making processes of international norms and legislation (lobby practices).		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
11	Companies integrate criteria on corruption in their procurement policies and operational policies.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
12	Companies include clauses on the compliance with criteria on corruption in their contracts with subcontractors and suppliers.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
Total scores			0,0						0,0						
Total scores expressed as percentage			0%						0%						

Assessment elements		Baseline study											
Elements 'Gender equality'	Repeated Applied standards and initiatives	Content of policy	Scope of policy				Score per element	Policy document(s)	Notes and quotes (draft assessment)	Question to financial institution	Feedback from financial institution	Response from analyst	Notes and quotes (final assessment)
			Corporate credits	Project finance	Asset management own account	Asset management for account clients							
<i>The following elements are crucial for a policy regarding the financial institution's internal operations:</i>													
1	The financial institution has an explicitly gender-sensitive zero tolerance policy commitment towards all forms of gender-based discrimination in employment and occupation, including psychological harm and verbal.	0	n.a.	n.a.	n.a.	n.a.	0%	0,0					
2	The financial institution has systems in place to actively manage pay equity.	0	n.a.	n.a.	n.a.	n.a.	0%	0,0					
3	The financial institution has systems in place to prevent and mitigate gender discrimination of its customers.	0	n.a.	n.a.	n.a.	n.a.	0%	0,0					
4	The financial institution guarantees at least 30% participation and equal access of women and men at senior level positions.	0	n.a.	n.a.	n.a.	n.a.	0%	0,0					
5	The financial institution guarantees at least 40% participation and equal access of women and men at senior level positions.	0	n.a.	n.a.	n.a.	n.a.	0%	0,0					
6	The financial institution provides targeted professional development for employees to promote equal access for women to senior level positions.	0	n.a.	n.a.	n.a.	n.a.	0%	0,0					
<i>The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:</i>													
7	Companies have made a policy commitment to mitigate the human rights risks faced by people as a result of their gender.	0	n.a.	n.a.	0	n.a.	0%	0,0					
8	Companies have an explicitly gender-sensitive zero tolerance policy towards all forms of gender-based discrimination, including psychological harm and verbal, physical and sexual harassment.	0	n.a.	n.a.	0	n.a.	0%	0,0					
9	Companies have systems in place to actively manage pay equity.	0	n.a.	n.a.	0	n.a.	0%	0,0					
10	Companies have systems in place to prevent and mitigate gender discrimination of its customers.	0	n.a.	n.a.	0	n.a.	0%	0,0					
11	Companies guarantee at least 30% participation and equal access of women and men at senior level positions.	0	n.a.	n.a.	0	n.a.	0%	0,0					
12	Companies guarantee at least 40% participation and equal access of women and men at senior level positions.	0	n.a.	n.a.	0	n.a.	0%	0,0					
13	Companies provide targeted professional development, and where necessary also education and training, for employees to promote equal access for women to senior level positions.	0	n.a.	n.a.	0	n.a.	0%	0,0					
14	Companies include gender and women's rights criteria in their procurement and operational policies.	0	n.a.	n.a.	0	n.a.	0%	0,0					
15	Companies include clauses on the compliance with gender and women's rights criteria in their contracts with subcontractors and suppliers.	0	n.a.	n.a.	0	n.a.	0%	0,0					
Total scores		0,0						0,0					
Total scores expressed as percentage		0%						0%					

Assessment elements		Baseline study													
Elements 'Human Rights'	Repeated	Applied standards and initiatives	Content of policy	Corporate credits	Project finance	Asset management own account	Asset management for account clients	Scope of policy	Score per element	Policy document(s)	Notes and quotes (draft assessment)	Question to financial institution	Feedback from financial institution	Response from analyst	Notes and quotes (final assessment)
1		The financial institution respects all human rights as described in the United Nations Guiding Principles on Business and Human Rights.	0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
<i>The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:</i>															
2		Companies respect all human rights as described in the United Nations Guiding Principles on Business and Human Rights.	0	1	n.a.	n.a.	1	n.a.	100%	1,0		sufficient, due to reference to UN Global Compact, see			
3		Companies have a policy commitment to meet their responsibility to respect human rights.	0	1	n.a.	n.a.	1	n.a.	100%	1,0		sufficient, due to reference to UN Global Compact, see			
4		Companies have a human rights due diligence process to identify, prevent, mitigate and account for how they address their impact on human rights.	0	1	n.a.	n.a.	1	n.a.	100%	1,0		sufficient, due to reference to UN Global Compact, see			
5		Companies have processes to enable the remediation of any adverse human rights impact which they cause or to which they contribute.	0	1	n.a.	n.a.	1	n.a.	100%	1,0		sufficient, due to reference to UN Global Compact, see			
6		Companies establish or participate in effective operational-level grievance mechanisms for individuals and communities who may be adversely impacted.	0	1	n.a.	n.a.	0	n.a.	50%	0,5		content score, due to reference to UN Global Compact, see			
7		Companies prevent conflicts over land rights and acquire natural resources only by engaging in meaningful consultation with local communities and obtaining free, prior and informed consent (FPIC) when it concerns indigenous peoples.	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
8		Companies prevent conflict over land rights and acquire natural resources only with free, prior and informed consent (FPIC) of peoples with customary tenure rights.	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
9		Companies have special attention for respecting the rights of children.	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
10		Companies do not enable settlements, including their economic activities, in occupied territories in respect of International Humanitarian Law.	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
11		Companies integrate human rights criteria into their procurement and operational policies.	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
12		Companies include clauses on compliance with human rights criteria in their contracts with subcontractors and suppliers.	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
Total scores								90%	3,8						
Total scores expressed as percentage				42%					38%						

Assessment elements		Baseline study													
Elements 'Labour rights'	Repeated	Applied standards and initiatives	Content of policy	Corporate credits				Scope of policy	Score per element	Policy document(s)	Notes and quotes (draft assessment)	Question to financial institution	Feedback from financial institution	Response from analyst	Notes and quotes (final assessment)
				Project finance	Asset management own account	Asset management for account clients									
<i>The following elements are crucial for a policy regarding the financial institution's internal operations:</i>															
1		The financial institution respects the ILO Declaration on Fundamental Principles and Rights at Work.	0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
2		The financial institution integrates at least the labour standards of the ILO Declaration on Fundamental Principles and Rights at Work in its procurement policies.	0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
<i>The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:</i>															
3		Companies uphold the freedom of association and the effective recognition of the right to collective bargaining.	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
4		All forms of forced and compulsory labour are unacceptable.	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
5		Child labour is unacceptable.	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
6		Discrimination in respect of employment and occupation is unacceptable.	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
7		Companies are committed to fair recruitment practices.	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
8		Companies pay a living wage to their employees.	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
9		Companies apply a maximum of working hours.	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
10		Companies have a comprehensive health and safety policy.	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
11		Companies ensure equal treatment and working conditions for migrant workers.	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
12		Companies have a clear management system to monitor and, if needed, correct compliance with norms on labour law.	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
13		Companies establish procedures on how to deal and process employee complaints and to solve violations and conflicts, preferably in consultation with the relevant trade union.	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
14		Companies integrate labour rights in their procurement policies.	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
15		Companies include clauses on the compliance with criteria on labour rights in their contracts with subcontractors and suppliers.	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
Total scores			0,0						0,0						
Total scores expressed as percentage			0%						0%						

Assessment elements		Baseline study													
Elements 'Nature'	Repeated	Applied standards and initiatives	Content of policy	Corporate credits	Project finance	Asset management own account	Asset management for account clients	Scope of policy	Score per element	Policy document(s)	Notes and quotes (draft assessment)	Question to financial institution	Feedback from financial institution	Response from analyst	Notes and quotes (final assessment)
1		Companies prevent negative impacts on High Conservation Value (HCV) areas within their business operations and the areas they manage.	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
2		Companies prevent negative impacts on protected areas that fall under the categories I-IV of the International Union for Conservation of Nature (IUCN) within their business operations and the areas they manage.	<i>Food 5; Mining 1; Oil&Gas 1; Power gen. 9</i>	0	0	n.a.	n.a.	0	n.a.	0%	0,0				
3		Companies prevent negative impacts on UNESCO World Heritage sites within their business operations and the areas they manage.	<i>Food 6; Oil&Gas 2; Mining 2; Power gen. 10</i>	0	0	n.a.	n.a.	0	n.a.	0%	0,0				
4		Companies prevent negative impacts on protected areas that fall under the Ramsar Convention on Wetlands within their business operations and the areas they manage.		0	0	n.a.	n.a.	0	n.a.	0%	0,0				
5		Companies prevent negative impacts for the populations or the number of animal species that are on the IUCN Red List of Threatened Species.		0	0	n.a.	n.a.	0	n.a.	0%	0,0				
6		Trade in endangered plant and animal species complies with the CITES conditions.		0	n.a.	n.a.	0	n.a.	0%	0,0					
7		Trade in endangered plant and animal species that are on the CITES lists is unacceptable.		0	n.a.	n.a.	0	n.a.	0%	0,0					
8		Activities in the field of genetic materials and genetic engineering only take place if they meet the permission and processing requirements as described in the UN Convention on Biological Diversity and the related Bonn	<i>Food 8</i>	0	n.a.	n.a.	0	n.a.	0%	0,0					
9		Production of, or trade in, living genetically modified organisms can only take place if permission has been obtained from the importing country and all requirements of the Cartagena Protocol have been met.	<i>Food 9</i>	0	n.a.	n.a.	0	n.a.	0%	0,0					
10		Companies prevent the introduction of invasive alien species in ecosystems.		0	0	n.a.	n.a.	0	n.a.	0%	0,0				
11		Companies conduct water scarcity impact assessments in water scarce regions.	<i>Food 21; Mining 8; Oil&Gas 8</i>	0	n.a.	n.a.	0	n.a.	0%	0,0					
12		Companies have comprehensive mitigation measures in place to address community and ecosystem water requirements in areas where environmental impact assessments identify that significant impacts to water resources are likely.	<i>Food 22; Mining 9; Oil&Gas 9</i>	0	n.a.	n.a.	0	n.a.	0%	0,0					
13		Companies make an environmental impact assessment on the total consequences of a large scale project on biodiversity, at least according to GR! 304: Biodiversity 2016 or other relevant standards (mentioned in section		0	0	n.a.	n.a.	0	n.a.	0%	0,0				
14		Companies integrate criteria on nature into their procurement and operational policies.		0	0	n.a.	n.a.	0	n.a.	0%	0,0				
15		Companies include clauses on the compliance with criteria on nature in their contracts with subcontractors and suppliers.		0	n.a.	n.a.	0	n.a.	0%	0,0					
Total scores				0,0					0%						
Total scores expressed as percentage				0%					0%						

Assessment elements		Baseline study													
Elements 'Tax'	Repeated	Applied standards and initiatives	Content of policy	Corporate credits	Project finance	Asset management own account	Asset management for account clients	Scope of policy	Score per element	Policy document(s)	Notes and quotes (draft assessment)	Question to financial institution	Feedback from financial institution	Response from analyst	Notes and quotes (final assessment)
1			0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
2			0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
3			0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
4			0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
5			0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
6			0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
7			0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
8			0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
<i>The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:</i>															
9			0	n.a.	n.a.	0	n.a.	0%	0,0						
10			0	n.a.	n.a.	0	n.a.	0%	0,0						
11		Mining 19; Oil&Gas 17	0	n.a.	n.a.	0	n.a.	0%	0,0						
12			0	0	n.a.	n.a.	0	n.a.	0%	0,0					
13			0	n.a.	n.a.	0	n.a.	0%	0,0						
14			0	n.a.	n.a.	0	n.a.	0%	0,0						
15			0	n.a.	n.a.	0	n.a.	0%	0,0						
16			0	0	n.a.	n.a.	0	n.a.	0%	0,0					
17			0	n.a.	n.a.	0	n.a.	0%	0,0						
Total scores			0,0						0,0						
Total scores expressed as percentage			0%						0%						

Assessment elements		Baseline study															
Elements 'Arms'	Repeated	Applied standards and initiatives	Content of policy	Corporate credits		Project finance		Asset management own account	Asset management for account clients	Scope of policy	Score per element	Policy document(s)	Notes and quotes (draft assessment)	Question to financial institution	Feedback from financial institution	Response from analyst	Notes and quotes (final assessment)
<i>The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:</i>																	
1		Use, production, development, maintenance, testing, stockpiling of and trade in anti-personal landmines, including key components of landmines, is unacceptable.	1	n.a.	n.a.	1	n.a.			100%	1,0		sufficient, see p.9:"Ausgeschlossen ist ferner der Erwerb von see element 1				
2		Use, production, development, maintenance, testing, stockpiling of and trade in cluster munitions, including key components of cluster munitions, is unacceptable.	1	n.a.	n.a.	1	n.a.			100%	1,0		see element 1				
3		Use, production, development, maintenance, testing, stockpiling of and trade in nuclear weapons, including key components of nuclear weapons, in or to countries that have not ratified the Non-proliferation Treaty is unacceptable.	1	n.a.	n.a.	1	n.a.			100%	1,0		see element 1				
4		Use, production, development, maintenance, testing, stockpiling of and trade in nuclear weapons, including key components of nuclear weapons, is unacceptable	1	n.a.	n.a.	1	n.a.			100%	1,0		see element 1				
5		Use, production, development, maintenance, testing, stockpiling of and trade in chemical weapons, including key components of chemical weapons, is unacceptable.	1	n.a.	n.a.	1	n.a.			100%	1,0		see element 1				
6		Use, production, development, maintenance, testing, stockpiling of and trade in biological weapons, including key components of biological weapons, is unacceptable.	1	n.a.	n.a.	1	n.a.			100%	1,0		see element 1				
7		Use, production, development, maintenance, testing, stockpiling of and trade in lethal autonomous weapons systems (LAWS), including components designed for LAWS, is unacceptable.	0	n.a.	n.a.	0	n.a.			0%	0,0						
8		Goods that are essential for military purposes, but can also be used for civilian products ('dual-use' goods), are considered as military goods when they have a non-civilian purpose.	0	n.a.	n.a.	0	n.a.			0%	0,0						
9		Supply of arms and weapon systems, military transport systems, and other military goods to countries that are under a United Nations or relevant multilateral arms embargo, is unacceptable.	0	n.a.	n.a.	0	n.a.			0%	0,0						
10		Supply of arms and weapon systems, military transport systems, and other military goods is unacceptable if there is an overriding risk that the arms will be used for serious violation of international human rights and humanitarian	0	n.a.	n.a.	0	n.a.			0%	0,0						
11		Supply of arms and weapon systems, military transport systems, and other military goods to countries that severely violate human rights, is unacceptable.	0	n.a.	n.a.	0	n.a.			0%	0,0						
12		Supply of arms and weapon systems, military transport systems, and other military goods to parties involved in conflict is unacceptable, unless to parties acting in accordance with a UN Security Council resolution.	0	n.a.	n.a.	0	n.a.			0%	0,0						
13		Supply of arms and weapon systems, military transport systems, and other military goods to countries that are sensitive to corruption, is unacceptable.	0	n.a.	n.a.	0	n.a.			0%	0,0						
14		Supply of arms and weapon systems, military transport systems, and other military goods to countries having a failed or fragile state, is unacceptable.	0	n.a.	n.a.	0	n.a.			0%	0,0						
15		Supply of arms and weapon systems, military transport systems, and other military goods to countries that spend a disproportionate part of their budget on purchases of arms, is unacceptable.	0	n.a.	n.a.	0	n.a.			0%	0,0						
Total scores			4,0							100%	4,0						
Total scores expressed as percentage			40%								40%						

Assessment elements		Baseline study													
Elements 'Food'	Repeated	Applied standards and initiatives	Content of policy	Corporate credits	Project finance	Asset management own account	Asset management for account clients	Scope of policy	Score per element	Policy document(s)	Notes and quotes (draft assessment)	Question to financial institution	Feedback from financial institution	Response from analyst	Notes and quotes (final assessment)
1	Companies respect the right to adequate food.		0	n.a.	n.a.	0	n.a.	0%	0,0						
2	Companies respect the ILO Declaration on Fundamental Principles and Rights at Work.	Labour rights 3, 4, 5, 6	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
3	Companies prevent conflicts over land rights and acquire natural resources only by engaging in meaningful consultation with local communities and obtaining free, prior and informed consent (FPIC) when it concerns	Human rights 7	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
4	Companies prevent conflict over land rights and acquire natural resources only with free, prior and informed consent (FPIC) of peoples with customary tenure rights.	Human rights 8	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
5	Companies prevent negative impacts on protected areas that fall under the categories I-IV of the International Union for Conservation of Nature (IUCN) within their business operations and the areas they manage.	Nature 2	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
6	Companies prevent negative impacts on UNESCO World Heritage sites within their business operations and the areas they manage.	Nature 3	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
7	Companies prevent negative impacts on protected areas that fall under the Ramsar Convention on Wetlands within their business operations and the areas they manage.	Nature 4	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
8	Activities in the field of genetic materials and genetic engineering only take place if they meet the permission and processing requirements described in the UN Convention on Biological Diversity and the related Bonn Guidelines	Nature 8	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
9	Production of, or trade in, living genetically modified organisms can only take place if permission of the importing country has been obtained and all requirements of the Cartagena Protocol have been met.	Nature 9	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
10	Companies respect the Five Freedoms of animals.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
11	Very restricted housing methods for calves (in crates), hens (in battery cages) and sows (in feeding cubicles) are unacceptable.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
12	Companies reduce the time limit of animal transport to a maximum of 8 hours.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
13	Companies apply a prudent use of antimicrobial medicines (antibiotics) in food-producing animals in order to minimize antimicrobial resistance.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
14	Companies reduce their direct and indirect greenhouse gas emissions.	Climate change 13	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
15	Companies reduce their direct and indirect emissions of harmful substances, such as particulate matter, nitrogen oxide and ammonia.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
16	Conversion of peatland and high-carbon stocks for agricultural development is unacceptable.	Climate change 21	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
17	Companies contribute to an ambitious, time-bound shift from animal protein to plant and alternative proteins in order to decrease animal protein consumption.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
18	Companies minimise use of pesticides.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
19	Companies minimise use of water.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					


20	Companies prevent water pollution.		0	0	n.a.	n.a.	0	n.a.	0%	0,0	
21	Companies conduct water scarcity impact assessments in water scarce regions.	Nature 11		0	n.a.	n.a.	0	n.a.	0%	0,0	
22	Companies have comprehensive mitigation measures in place to address community and ecosystem water requirements in areas where environmental impact assessments identify that significant impacts to water resources are	Nature 12		0	n.a.	n.a.	0	n.a.	0%	0,0	
23	Companies work with relevant standards and initiatives for raw materials (mentioned in 3.4.2.).			0	n.a.	n.a.	0	n.a.	0%	0,0	
24	Companies are certified according to certification schemes criteria (mentioned in section 3.4.2) for raw materials.			0	n.a.	n.a.	0	n.a.	0%	0,0	
25	Companies publish a sustainability report that may contain (a number of) disclosures from the GRI Standards.		0	0	n.a.	n.a.	0	n.a.	0%	0,0	
26	Large enterprises and multinational enterprises publish a sustainability report that is set up in accordance with the (Core or Comprehensive option of) GRI Standards.			0	n.a.	n.a.	0	n.a.	0%	0,0	
27	Companies integrate environmental, social and governance criteria in their procurement and operational policies.		0	0	n.a.	n.a.	0	n.a.	0%	0,0	
28	Companies include clauses on the compliance with environmental, social and governance criteria in their contracts with subcontractors and suppliers.			0	n.a.	n.a.	0	n.a.	0%	0,0	
Total scores				0,0					0%	0,0	
Total scores expressed as percentage				0%					0%	0,0	

Assessment elements		Baseline study													
Elements 'Forestry'	Repeated	Applied standards and initiatives	Content of policy	Corporate credits	Project finance	Asset management own account	Asset management for account clients	Scope of policy	Score per element	Policy document(s)	Notes and quotes (draft assessment)	Question to financial institution	Feedback from financial institution	Response from analyst	Notes and quotes (final assessment)
1	Companies prevent negative impacts on High Conservation Value (HCV) areas within their business operations and the forests they manage.	Nature 1	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
2	Companies prevent negative impacts on High Carbon Stock (HCS) areas within their business operations and the forests they manage.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
3	Companies throughout the wood supply chain prevent the use of illegally cut and traded timber.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
4	Pulp and paper factories restrict the use of chemicals and the pollution of soil, water and air by making use of the best available techniques.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
5	Companies respect the rights of local and indigenous communities on the fair and equal use of forests.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
6	Companies prevent conflicts over land rights and acquire natural resources only by engaging in serious consultation with local communities and obtaining free, prior and informed consent (FPIC) when it concerns	Human rights 7	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
7	Companies prevent conflict over land rights and acquire natural resources only with free, prior and informed consent (FPIC) of peoples with customary tenure rights.	Human rights 8	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
8	Production forests and timber plantations are certified according to the Forest Stewardship Council (FSC) forest management certification.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
9	Supply chains of timber traders and companies in the wood product chain (including pulp, paper, veneer, furniture) are certified according to the FSC chain of custody certification.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
10	Companies in industries with a large impact on forests (including in any case the forestry and paper industry), report their forest related information to the Carbon Disclosure Project (CDP) Forest Program..		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
11	Companies publish a sustainability report that may contain (a number of) disclosures from the GRI Standards.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
12	Large enterprises and multinational enterprises publish a sustainability report that is set up in accordance with the (Core or Comprehensive option of) GRI Standards.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
13	Companies integrate environmental, social and governance criteria in their procurement and operational policies.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
14	Companies include clauses on the compliance with environmental, social and governance criteria in their contracts with subcontractors and suppliers.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
Total scores				0,0					0,0						
Total scores expressed as percentage				0%					0%						

Assessment elements		Baseline study													
Elements 'Mining'	Repeated	Applied standards and initiatives	Content of policy	Corporate credits	Project finance	Asset management own account	Asset management for account clients	Scope of policy	Score per element	Policy document(s)	Notes and quotes (draft assessment)	Question to financial institution	Feedback from financial institution	Response from analyst	Notes and quotes (final assessment)
1	Companies prevent negative impacts on protected areas that fall under the categories I-IV of the International Union for Conservation of Nature (IUCN) within their business operations and the areas they manage.	Nature 2	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
2	Companies prevent negative impacts on UNESCO World Heritage sites within their business operations and the areas they manage.	Nature 3	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
3	Companies prevent negative impacts on protected areas that fall under the Ramsar Convention on Wetlands within their business operations and the areas they manage.	Nature 4	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
4	Companies mitigate the chance of accidents by making use of the best available techniques and have a solid road map for crisis situations (a 'contingency plan').		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
5	Companies do not operate in locations where the consequences of an accident for the environment are unmanageable.	Oil&Gas 5		0	n.a.	n.a.	0	n.a.	0%	0,0					
6	Companies reduce extractive waste and manage and process this in a responsible way by adequately tracking, reviewing and acting to improve their tailings risk management and by adopting a zero-failure objective to		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
7	Riverine tailings disposal and sub-marine tailings disposal is unacceptable.			0	n.a.	n.a.	0	n.a.	0%	0,0					
8	Companies conduct water scarcity impact assessments in water scarce regions.	Nature 11		0	n.a.	n.a.	0	n.a.	0%	0,0					
9	Companies have comprehensive mitigation measures in place to address community and ecosystem water requirements in areas where environmental impact assessments identify that significant impacts to water resources are likely.	Nature 12		0	n.a.	n.a.	0	n.a.	0%	0,0					
10	Companies include the environmental and health effects of a mine after its closure in plans for the development of new mines.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
11	Companies ensure the recovery of ecosystems after commercial activities have been completed, for all extractive industry projects (i.e. this is included as an activity in the planning and the budget of the project).			0	n.a.	n.a.	0	n.a.	0%	0,0					
12	Companies respect small scale and artisanal mining and improve sustainable economic and social development on a local level.			0	n.a.	n.a.	0	n.a.	0%	0,0					
13	Companies respect the ILO Declaration on Fundamental Principles and Rights at work.	Labour rights 3, 4, 5, 6	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
14	Companies prevent conflicts over land rights and acquire natural resources only by engaging in serious consultation with local communities and obtaining free, prior and informed consent (FPIC) when it concerns indigenous peoples.	Human rights 7	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
15	Companies prevent conflict over land rights and acquire natural resources only with free, prior and informed consent (FPIC) of peoples with customary tenure rights.	Human rights 8		0	n.a.	n.a.	0	n.a.	0%	0,0					
16	Companies follow the Voluntary Principles on Security and Human Rights for the security of their employees and company premises.			0	n.a.	n.a.	0	n.a.	0%	0,0					
17	Companies have processes to enable the remediation of any adverse human rights impact which they cause or to which they contribute.	Human rights 5	0	1	n.a.	n.a.	1	n.a.	100%	1,0	sufficient, due to reference to UN Global Compact, see				
18	Companies pay the taxes owed in each country where they operate.	Oil&Gas 16	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
19	For each country in which companies operate, they report country-by-country on their revenues, profit, FTEs, subsidies received from governments and payments to governments (e.g. withholding taxes, payments for concessions	Tax 11		0	n.a.	n.a.	0	n.a.	0%	0,0					

20	Offering, promising, giving and requiring, either directly nor indirectly, bribes or other undue advantages in order to acquire or to maintain assignments or other undue advantages, is unacceptable.	Corruption 8	0	0	n.a.	n.a.	0	n.a.	0%	0,0	
21	Companies only operate in weak governance zone or conflict-affected areas if they are able to demonstrate that they are not causing or contributing to human rights abuses.	Oil&Gas 19		0	n.a.	n.a.	0	n.a.	0%	0,0	
22	Mining and trading in conflict minerals is unacceptable.			0	n.a.	n.a.	0	n.a.	0%	0,0	
23	Uranium mining is unacceptable.			0	n.a.	n.a.	0	n.a.	0%	0,0	
24	Asbestos mining is unacceptable.			0	n.a.	n.a.	0	n.a.	0%	0,0	
25	Mountaintop removal mining is unacceptable.			1	n.a.	n.a.	1	n.a.	100%	1,0	sufficient as there is an exclusion of fossil fuel companies, see see element 25
26	Establishing new coal mines is unacceptable.			1	n.a.	n.a.	1	n.a.	100%	1,0	
27	Thermal coal mining is unacceptable.	Climate change 18		1	n.a.	n.a.	1	n.a.	100%	1,0	see element 25
28	Companies work with relevant standards and initiatives for certain minerals (mentioned in section 3.8.2).			0	n.a.	n.a.	0	n.a.	0%	0,0	
29	Companies are certified according to the criteria of certification schemes for certain minerals (mentioned in section 3.8.2).			0	n.a.	n.a.	0	n.a.	0%	0,0	
30	Companies publish a sustainability report that may contain (a number of) disclosures from the GRI Standards.		0	0	n.a.	n.a.	0	n.a.	0%	0,0	
31	Large enterprises and multinational enterprises publish a sustainability report that is set up in accordance with the (Core or Comprehensive option of) GRI Standards.			0	n.a.	n.a.	0	n.a.	0%	0,0	
32	Companies integrate environmental, social and governance criteria in their procurement and operational policies.		0	0	n.a.	n.a.	0	n.a.	0%	0,0	
33	Companies include clauses on the compliance with environmental, social and governance criteria in their contracts with subcontractors and suppliers.			0	n.a.	n.a.	0	n.a.	0%	0,0	
Total scores				1,2					100%	1,2	
Total scores expressed as percentage				12%						12%	

Assessment elements		Baseline study														
Elements 'Oil & Gas'	Repeated	Applied standards and initiatives	Content of policy	Corporate credits	Project finance	Asset management own account	Asset management for account clients	Scope of policy	Score per element	Policy document(s)	Notes and quotes (draft assessment)	Question to financial institution	Feedback from financial institution	Response from analyst	Notes and quotes (final assessment)	
																<i>The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:</i>
1	Companies prevent negative impacts on protected areas that fall under the categories I-IV of the International Union for Conservation of Nature (IUCN) within their business operations and the areas they manage.	Nature 2	0	1	n.a.	n.a.	1	n.a.	100%	1,0		sufficient as there is an exclusion of fossil fuel companies, see element 1				
2	Companies prevent negative impacts on UNESCO World Heritage sites within their business operations and the areas they manage.	Nature 3	0	1	n.a.	n.a.	1	n.a.	100%	1,0		see element 1				
3	Companies prevent negative impacts on protected areas that fall under the Ramsar Convention on Wetlands within their business operations and the areas they manage.	Nature 4	0	1	n.a.	n.a.	1	n.a.	100%	1,0		see element 1				
4	Companies mitigate the chance of accidents (oil spills, leakages) by making use of the best available techniques and have a solid road map for crisis situations (a so called 'contingency plan').		0	1	n.a.	n.a.	1	n.a.	100%	1,0		see element 1				
5	Companies do not operate in locations where the consequences of an accident for the environment are unmanageable.	Mining 5		1	n.a.	n.a.	1	n.a.	100%	1,0		see element 1				
6	Companies reduce waste from oil and gas extraction and mining, especially the flaring of natural gas, and manage and process this in a responsible way.		0	1	n.a.	n.a.	1	n.a.	100%	1,0		see element 1				
7	Companies include the environmental and health effects of the dismantling of production facilities, especially of offshore drilling platforms, in plans for the development of new projects.		0	1	n.a.	n.a.	1	n.a.	100%	1,0		see element 1				
8	Companies conduct water scarcity impact assessments in water scarce regions.	Nature 11		1	n.a.	n.a.	1	n.a.	100%	1,0		see element 1				
9	Companies have comprehensive mitigation measures in place to address community and ecosystem water requirements in areas where environmental impact assessments identify that significant impacts to water resources are likely.	Nature 12		1	n.a.	n.a.	1	n.a.	100%	1,0		see element 1				
10	Companies reduce the effects of seismological research on whales and other marine mammals.		0	1	n.a.	n.a.	1	n.a.	100%	1,0		see element 1				
11	Companies respect the ILO Declaration on Fundamental Principles and Rights at Work.	Labour rights 3, 4, 5, 6	0	1	n.a.	n.a.	1	n.a.	100%	1,0		see element 1				
12	Companies prevent conflicts over land rights and acquire natural resources only by engaging in meaningful consultation with local communities and obtaining free, prior and informed consent (FPIC) when it concerns	Human rights 7	0	1	n.a.	n.a.	1	n.a.	100%	1,0		see element 1				
13	Companies prevent conflict over land rights and acquire natural resources only with free, prior and informed consent (FPIC) of peoples with customary tenure rights.	Human rights 8		1	n.a.	n.a.	1	n.a.	100%	1,0		see element 1				
14	Companies follow the Voluntary Principles on Security and Human Rights for the protection of their employees and de company sites.			1	n.a.	n.a.	1	n.a.	100%	1,0		see element 1				
15	Companies have processes to enable the remediation of any adverse human rights impact which they cause or to which they contribute.	Human rights 5	0	1	n.a.	n.a.	1	n.a.	100%	1,0		see element 1				
16	Companies pay the taxes owed in each country where they operate.	Mining 18	0	1	n.a.	n.a.	1	n.a.	100%	1,0		see element 1				
17	For each country in which companies operate, they report country-by-country on their revenues, profit, FTEs, subsidies received from governments and payments to governments (e.g. withholding taxes, payments for concessions	Tax 11		1	n.a.	n.a.	1	n.a.	100%	1,0		see element 1				
18	Offering, promising, giving, or requiring, either directly nor indirectly, bribes or other undue advantages in order to acquire or to maintain assignments or other undue advantages, is unacceptable.	Corruption 8	0	1	n.a.	n.a.	1	n.a.	100%	1,0		see element 1				
19	Companies only operate in weak governance zone or conflict-affected areas if they are able to demonstrate that they are not causing or contributing to human rights abuses.	Mining 21		1	n.a.	n.a.	1	n.a.	100%	1,0		see element 1				

20	Extracting oil from tar sands is unacceptable.	<i>Climate change 19</i>	1	n.a.	n.a.	1	n.a.	100%	1,0	see element 1	
21	Extracting oil from oil shale is unacceptable.		1	n.a.	n.a.	1	n.a.	100%	1,0	see element 1	
22	Extracting fuel from liquefied coal is unacceptable.		1	n.a.	n.a.	1	n.a.	100%	1,0	see element 1	
23	Extracting shale gas is unacceptable.		1	n.a.	n.a.	1	n.a.	100%	1,0	see element 1	
24	Arctic drilling for oil and gas is unacceptable.		1	n.a.	n.a.	1	n.a.	100%	1,0	see element 1	
25	Companies publish a sustainability report that may contain (a number of) disclosures from the GRI Standards.	0	1	n.a.	n.a.	1	n.a.	100%	1,0	see element 1	
26	Large enterprises and multinational enterprises publish a sustainability report that is set up in accordance with the (Core or Comprehensive option of) GRI Standards.		1	n.a.	n.a.	1	n.a.	100%	1,0	see element 1	
27	Companies integrate environmental, social and governance criteria in their procurement and operational policies.	0	1	n.a.	n.a.	1	n.a.	100%	1,0	see element 1	
28	Companies include clauses on the compliance with environmental, social and governance criteria in their contracts with subcontractors and suppliers.		1	n.a.	n.a.	1	n.a.	100%	1,0	see element 1	
Total scores			10,0		100%		10,0				
Total scores expressed as percentage			100%		100%		100%				

Assessment elements		Baseline study													
Elements 'Power generation'	Repeated	Applied standards and initiatives	Content of policy	Corporate credits	Project finance	Asset management own account	Asset management for account clients	Scope of policy	Score per element	Policy document(s)	Notes and quotes (draft assessment)	Question to financial institution	Feedback from financial institution	Response from analyst	Notes and quotes (final assessment)
1	The financial institution finances companies involved in renewable energy generation (wind, solar, small and medium scale hydro power, geothermal power, tidal power, etc.).		0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
2	The financial institution has a measurable target to increase its finance for renewable energy generation.		0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
3	The financial institution has a measurable target to reduce either its total amount of finance for fossil fuel-fired power generation, or to reduce finance for fossil fuel-fired power generation, relative to its finance for renewable energy generation.		0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
<i>The following elements are crucial for a policy regarding the companies a financial institution invests in or finances:</i>															
4	Unabated coal-fired power generation (i.e. without operational carbon capture and storage) is unacceptable.	Climate change 15	0	n.a.	n.a.	0	n.a.	0%	0,0						
5	Coal-fired power generation is unacceptable.	Climate change 16	0	n.a.	n.a.	0	n.a.	0%	0,0						
6	Fossil fuel-fired power generation is unacceptable.	Climate change 17	0	n.a.	n.a.	0	n.a.	0%	0,0						
7	Nuclear energy is unacceptable.		1	n.a.	n.a.	1	n.a.	100%	1,0		sufficient, see p.9:"Ausgeschlossen ist ferner der Erwerb von				
8	Large scale hydropower generation is unacceptable.		0	n.a.	n.a.	0	n.a.	0%	0,0						
9	Companies prevent negative impacts on protected areas that fall under the categories I-IV of the International Union for Conservation of Nature (IUCN) within their business operations and the areas they manage.	Nature 2	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
10	Companies prevent negative impacts on UNESCO World Heritage sites within their business operations and the areas they manage.	Nature 3	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
11	Companies prevent negative impacts on protected areas that fall under the Ramsar Convention on Wetlands within their business operations and the areas they manage.	Nature 4	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
12	Companies prevent conflicts over land rights and acquire natural resources only by engaging in serious consultation with local communities and obtaining free, prior and informed consent (FPIC) when it concerns indigenous peoples.	Human rights 7	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
13	Companies prevent conflict over land rights and acquire natural resources only with free, prior and informed consent (FPIC) of peoples with customary tenure rights.	Human rights 8	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
14	Companies have processes to enable the remediation of any adverse human rights impact to which they cause or to which they contribute.	Human rights 5	0	1	n.a.	n.a.	1	n.a.	100%	1,0		sufficient, due to reference to UN Global Compact, see			
15	The construction of dams complies with the 7 principles of the World Commission on Dams.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
16	The construction of all water infrastructure projects complies with the 7 principles of the World Commission on Dams.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
17	The production of biomaterials complies with the 12 principles of the Roundtable on Sustainable Biomaterials.	Climate change 22	0	0	n.a.	n.a.	0	n.a.	0%	0,0					
18	Companies publish a sustainability report that may contain (a number of) disclosures from the GRI Standards.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					
19	Large enterprises and multinational enterprises publish a sustainability report that is set up in accordance with the (Core or Comprehensive option of) GRI Standards.		0	0	n.a.	n.a.	0	n.a.	0%	0,0					

20	Companies integrate environmental, social and governance criteria in their procurement and operational policies.	0	0	n.a.	n.a.	0	n.a.	0%	0,0
21	Companies include clauses on the compliance with environmental, social and governance criteria in their contracts with subcontractors and suppliers.	0	0	n.a.	n.a.	0	n.a.	0%	0,0
Total scores		1,0						100%	1,0
Total scores expressed as percentage		10%							10%



Assessment elements		Baseline study											
Elements 'Remuneration'	Applied standards and initiatives	Content of policy				Scope of policy		Policy document(s)	Notes and quotes (draft assessment)	Question to financial institution	Feedback from financial institution	Response from analyst	Notes and quotes (final assessment)
		The whole group	(Board of directors)	Senior management			Score per element						
<i>The following elements are crucial for a policy regarding the financial institution's internal operations:</i>													
1	The financial institution maintains the right to recover bonuses if, after payment, it appears that they were paid unduly (a so-called clawback scheme).	0	0	0	0	0%	0,0						
2	The bonus is a maximum of 100% of the fixed annual salary.	0	0	0	0	0%	0,0						
3	The bonus is a maximum of 20% of the fixed annual salary.	0	0	0	0	0%	0,0						
4	The fixed salary does not exceed twenty times the lowest salary or the maximum of the lowest salary scale within the financial institution.	0	0	n.a.	n.a.	0%	0,0						
5	At least 60% of the bonus is based on long term objectives (not to be confused with agreements for deferred payment of the bonus).	0	0	0	0	0%	0,0						
6	At least one third of the bonus is based on non-financial criteria.	0	0	0	0	0%	0,0						
7	At least two thirds of the bonus is based on non-financial criteria.	0	0	0	0	0%	0,0						
8	The bonus is based on employee satisfaction.	0	0	0	0	0%	0,0						
9	The bonus is based on client satisfaction.	0	0	0	0	0%	0,0						
10	The bonus is based on improving the social and environmental impact of the financial institution's management and operational practices.	0	0	0	0	0%	0,0						
11	The bonus is based on improving the social and environmental impact of the financial institution's investments and financial services.	0	0	0	0	0%	0,0						
12	The financial institution applies its remuneration policy to the entire group, including the Board of Directors, the directors (in case of a 2-tier board structure), the senior management and risk takers.	0	n.a.	n.a.	n.a.	0%	0,0						
Total scores		0,0				0,0							
Total scores expressed as percentage		0%				0%							

Assessment elements		Baseline study												
Elements 'Transparency & Accountability'	Applied standards and initiatives	Content of policy	Corporate credits	Project finance	Asset management own account	Asset management for account clients	Scope of policy	Score per element	Policy document(s)	Notes and quotes (draft assessment)	Question to financial institution	Feedback from financial institution	Response from analyst	Notes and quotes (final assessment)
1	The financial institution describes its finance and investment framework regarding environmental and social issues and provides insight into how the financial institution ensures that investments meet the conditions set in its	0	n.a.	n.a.	0	n.a.	0%	0,0						
2	The financial institution's finance and investment framework regarding environmental and social issues is audited by a third party and the results are published.	0	n.a.	n.a.	0	n.a.	0%	0,0						
3	The financial institution publishes the names of governments in which it invests.	0	n.a.	n.a.	0	n.a.	0%	0,0						
4	The financial institution publishes the names of companies in which it invests.	0	n.a.	n.a.	0	n.a.	0%	0,0						
5	The financial institution mentions and describes all companies (on its website) to which it has granted credit.	0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
6	The financial institution mentions and describes mentions and describes all companies (on its website) to which it grants new credit.	0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
7	The financial institution discloses the names of all outstanding project finance transactions and project-related corporate loans, including the information required by the Equator Principles III.	0	n.a.	n.a.	n.a.	n.a.	0%	0,0						
8	The financial institution publishes a breakdown of its portfolio by region, size and industry (in line with GRIs FSSD FS6).	0	n.a.	n.a.	0	n.a.	0%	0,0						
9	The financial institution publishes a breakdown of its portfolio in a cross table, combining industry and region data.	0	n.a.	n.a.	0	n.a.	0%	0,0						
10	The financial institution publishes a sufficiently detailed breakdown of its portfolio, for example based on the first two digits of NACE and ISIC.	0	n.a.	n.a.	0	n.a.	0%	0,0						
11	The financial institution publishes a sufficiently detailed breakdown of its portfolio, for example based on the first four digits of NACE and ISIC.	0	n.a.	n.a.	0	n.a.	0%	0,0						
12	The financial institution publishes the number of companies with which there has been interaction on social and environment topics (in line with GRIs G4 FSSD FS10).	0	n.a.	n.a.	0	n.a.	0%	0,0						
13	The financial institution publishes the names of companies with which there has been interaction on social and environmental topics.	0	n.a.	n.a.	0	n.a.	0%	0,0						
14	The financial institution publishes the results of engagement, including the topics, goals and deadlines.	0	n.a.	n.a.	0	n.a.	0%	0,0						
15	The financial institution publishes the names of companies that are excluded from investment due to sustainability issues, including the reasons for this exclusion.	0	n.a.	n.a.	0	n.a.	0%	0,0						
16	The financial institution publishes its voting record.	0	n.a.	n.a.	0	n.a.	0%	0,0						
17	The financial institution publishes a sustainability report that may contain (a number of) disclosures from the GRI Standards.	0	n.a.	n.a.	n.a.	n.a.	0%	0,0						

18	The financial institution publishes a sustainability report that is set up in accordance with the (Core or Comprehensive option of) GRI Standards.	0	n.a.	n.a.	n.a.	n.a.	0%	0,0
19	The financial institution's sustainability report has been verified externally.	0	n.a.	n.a.	n.a.	n.a.	0%	0,0
20	The financial institution reports on the consultation with civil society organisations and other stakeholders.	0	n.a.	n.a.	n.a.	n.a.	0%	0,0
21	The financial institution has complaint mechanisms for clients and non-clients.	0	n.a.	n.a.	n.a.	n.a.	0%	0,0
22	The financial institution establishes or participates in effective operational-level grievance mechanisms for individuals and communities which may be adversely impacted by activities that it is connected to.	0	n.a.	n.a.	n.a.	n.a.	0%	0,0
23	The financial institution reports on the grievance mechanism process, including its progress and performance.	0	n.a.	n.a.	n.a.	n.a.	0%	0,0
24	The financial institution commits to respecting and cooperating in good faith with State-based non-judicial and judicial grievance mechanisms when cases that it is connected with are brought to such a mechanism.	0	n.a.	n.a.	n.a.	n.a.	0%	0,0
Total scores		0,0						0,0
Total scores expressed as percentage		0%						0%

