

## ESG Reporting and Disclosure Template

Name of the Reporting Entity:

JSC "Liberty Bank"

Date: 31.12.2024

*This Template is complementary to NBG's Environmental, Social and Governance (ESG) Reporting and Disclosure Principles. The NBG ESG Principles and the corresponding template are mainly designed to assist commercial banks to disclose ESG related information in a relevant, useful, consistent and comparable manner. However, it also encourages other types of financial institutions, and non-financial sector entities, to disclose ESG-related information and to use the Principles and the template for their reference.*

*Please provide ESG related information regarding the entity's 1. Business Model, 2. Policies and Due Diligence, 3. Outcome 4. Risk and Management and fill out the form for KPIs on the corresponding sheets. The form should be filled out in accordance to the NBG's ESG Reporting and Disclosure Principles. Please note that the questions are non-exhaustive and are provided for general guidance. Once filled in, the template should be attached as an annex to a Pillar 3 annual report by the reporting entity when applicable. If a reporting entity is not subject to Pillar 3 requirements, an entity can directly submit the filled out template to the NBG. All the filled out templates will be published on the NBG's website. An entity should provide a report on ESG-related information at least once a year.*

*In case of questions, please contact: [Mariam.Kharaishvili@nbg.gov.ge](mailto:Mariam.Kharaishvili@nbg.gov.ge)*


## Disclosure on Business Model

Please provide ESG related information regarding the entity's business model below. The form should be filled out in accordance to the NBG's ESG Reporting and Disclosure Principles. Please note that the questions below are non-exhaustive and are provided for general guidance.

Questions	Answer	Additional Comments
Describe the impact of ESG risks and opportunities of the investment and lending portfolios on the entity's business model, strategy and financial planning.	ESG risks and opportunities are having an increasingly significant impact on Liberty Bank's business model, strategy, and financial planning. The integration of environmental, social, and governance (ESG) factors into investment and lending processes has become an important part of the Bank's long-term vision. Opportunities such as green financing, renewable energy projects, and support for small and medium-sized enterprises (SMEs) with sustainable practices are reshaping the Bank's lending and, consequently, portfolio structure. These factors also influence strategic decisions, including risk management, capital allocation, and the development of new products. Accordingly, Liberty Bank is working on the development of a Green Finance Strategy and on integrating ESG goals into its financial planning and portfolio monitoring processes. ESG integration not only reduces long-term risks but also creates new opportunities on the Bank's path to growth.	—
Describe whether and how the entity considers that its counterparties take ESG risks and opportunities into account.	Currently, Liberty Bank does not assess ESG risk management practices among its partners.	—
Describe how the entity incorporates the assessment of ESG risks and opportunities into relevant investment and lending strategies.	In 2022, Liberty Bank began exploring and incorporating ESG risks and opportunities into its investment and lending strategies. The Bank has initiated steps to align these strategies with international best practices and plans to actively engage with international financial institutions to strengthen its ESG integration efforts.	—
Describe how the transition to a lower-carbon economy might affect relevant investment and lending strategies.	The transition to a low-emission economy will have a significant impact on Liberty Bank's investment and lending strategies. As Georgia aims to implement climate change mitigation strategies and reduce greenhouse gas emissions, financial institutions, including Liberty Bank, will be presented with new opportunities. The bank may shift its portfolio toward financing greener and more sustainable projects—such as renewable energy sources, energy efficiency, and more. This could involve increased financing for solar, wind, and hydropower projects, as well as providing loans to companies that adopt environmentally friendly technologies.	—
Describe the ways in which the entity's business model can affect the environment and society both positively and negatively.	Through responsible lending practices, support for green projects, and the future implementation of a Green Finance Strategy, Liberty Bank can help reduce carbon emissions, promote energy efficiency, and encourage sustainable business practices. Additionally, partnerships with international institutions can help promote ESG standards and awareness across its client base. If not properly managed, the Bank's lending and investment activities may indirectly support businesses with high environmental footprints or poor labor and governance practices.	—
Describe opportunities related to resource efficiency and cost savings, the adoption of low-emission/polluting energy sources, the development of new products and services, access to new markets, and building resilience along the value chain.	Opportunities include improving resource efficiency and reducing operational costs through energy-saving technologies and optimized processes. The adoption of low-emission energy sources can enhance environmental performance and regulatory compliance. Developing green products and services opens new revenue streams, while access to emerging sustainable markets expands business reach. Strengthening resilience across the value chain ensures long-term stability and adaptability to climate and ESG-related risks.	—
Other relevant information	—	—

## Disclosure on Policies and Due Diligence Processes

Please provide ESG related information regarding the entity's policies and due diligence processes below. The form should be filled out in accordance to the NBG's ESG Reporting and Disclosure Principles. Please note that the questions below are non-exhaustive and are provided for general guidance.

Questions	Answer	Additional Comments
Describe any entity policies related to ESG issues.	Liberty Bank follows an ESG policy adopted under Protocol No. 278/319, dated December 17, 2021. This comprehensive document outlines the principles and procedures related to the Bank's internal ESG practices, the classification of ESG risks within the lending process, and their proper assessment and management. It also defines the roles and responsibilities at the structural level and sets guidelines for regular client evaluations and monitoring activities. Importantly, Liberty Bank's ESG policy is aligned with international standards, including those of the International Finance Corporation (IFC).	-
Describe any ESG-related targets the entity has set as part of its policies.	ESG risk assessment is initiated at the beginning of the credit process, during which projects are assigned appropriate ESG risk categories based on their sector of activity. If a project is determined to have a potentially significant environmental impact, the assessment continues throughout the entire loan lifecycle. This includes comprehensive due diligence measures—such as visual audits—to evaluate the project's impact on environmental and social factors. Based on the findings, tailored mitigation measures related to environmental protection, occupational health and safety, and social considerations are established for the client. Furthermore, clients categorized under higher ESG risk are required to submit an annual Environmental & Social (E&S) monitoring report to Liberty Bank. This requirement supports the Bank's goal of maintaining an effective and continuous monitoring mechanism for environmentally and socially impactful clients.	-
Describe the oversight of ESG governance by its executive officer(s), board committee or highest governing body.	 <pre> graph BT     A[Risk Director, Deputy CEO] --&gt; B[Head of the Risk Department, Deputy Head of the Risk Director]     B --&gt; C[ESG Risk Manager]             </pre>	-
Describe how the entity encourages better disclosure and practices related to ESG-related risks to improve data availability. Also, any effort to increase the awareness of counterparties, and more generally of customers, of the relevance of ESG-related issues as part of their lending and investment processes.	Since the adoption of the ESG policy document, Liberty Bank has been actively working to ensure its effective implementation. Key efforts include updating the Liberty Bank website to reflect environmental considerations, conducting internal trainings to raise employee awareness of ESG-related issues, and planning additional awareness and capacity-building activities in the future.	-
Describe how ESG-related issues are considered as drivers of value in the entity's investment decision process.	According to the ESG policy, ESG risks are classified into three categories: LOW, MEDIUM, and HIGH. The policy provides detailed criteria and corresponding activity lists for assigning each risk level. Clients identified as HIGH risk are subject to extended due diligence, including ongoing monitoring by the bank—annually or even quarterly. In such cases, the loan agreement incorporates specific mitigation or compensatory obligations based on findings from due diligence and site visits, outlined in an Environmental and Social Action Plan (ESAP). MEDIUM risk clients are contractually required to fully comply with applicable environmental, occupational health and safety, and social legislation. LOW risk clients are assessed prior to any credit decision and are typically not associated with significant ESG risks or adverse impacts. In addition, Liberty Bank plans to further enhance its ESG approach in the coming years in line with its Climate Transition Plan. This includes the implementation of a dedicated Green Finance Strategy (until 2025), which will guide future actions and commitments in sustainable finance and environmental impact reduction.	-
Describe the entity's approach for incorporating ESG aspects into practices.	In addition to Liberty Bank's existing policies and ESG risk assessment documents, the Bank actively collaborated with the European Investment Bank (EIB) throughout 2024 to ensure the full and effective implementation of the National Bank of Georgia's ESG guidelines within its operations. As part of this technical assistance project, several key documents were developed, including the Climate Transition Plan, Green Finance Strategy, Green Finance Framework, Climate Risk Reporting Framework, and other related documents/procedures.	-
Describe the entity's approach to due diligence (including project level) and any particular standards or guidelines the entity follows.	Liberty Bank follows the ESG risk assessment criteria set by the International Finance Corporation (IFC), which categorize risks into three levels: LOW, MEDIUM, and HIGH. Each category is defined by specific criteria and associated activities. For clients classified as HIGH risk, the due diligence process is extended and includes ongoing monitoring by the Bank, conducted annually or, in some cases, quarterly. These clients are also subject to contractual obligations requiring the implementation of mitigation or compensatory measures in response to any violations identified during the due diligence process and site visits. These measures are detailed in an Environmental and Social Action Plan (ESAP). MEDIUM risk clients are contractually required to fully comply with all applicable environmental, occupational health and safety, and social	-
Other relevant information	-	-

### Disclosure on Outcomes

Please provide ESG related information regarding the entity's outcomes below. The form should be filled out in accordance to the NBG's ESG Reporting and Disclosure Principles. Please note that the questions below are non-exhaustive and are provided for general guidance.

Questions	Answer	Additional Comments
Describe the outcomes of the entity's ESG policy, including the performance against the indicators used and targets set to manage ESG risks and opportunities.	Since adopting its ESG policy in 2021, Liberty Bank has made significant progress in integrating ESG considerations into its operations. ESG risk assessments are now systematically applied at the start of the credit process, with clients categorized as LOW, MEDIUM, or HIGH risk based on IFC standards. High-risk clients are subject to enhanced due diligence and monitoring, including the implementation of Environmental and Social Action Plans (ESAPs). The Bank has strengthened internal capacity through ESG trainings and the formation of a dedicated ESG working group. Clients with elevated risk levels are required to submit annual Environmental & Social monitoring reports, enhancing the Bank's ability to manage ongoing impacts. In 2024, with support from the European Investment Bank, Liberty Bank developed key documents, including a Green Finance Strategy, Climate Transition Plan, and Climate Risk Reporting Framework. These efforts support the Bank's goal to expand green lending and improve climate resilience. Initial indicators show increased ESG risk screening and the introduction of GHG emissions calculations, including financed emissions, in line with the Bank's Climate Transition Plan.	-
Describe the development trend of the amount of ESG-related assets against any relevant target set and the related risks over time.	Over recent years, Liberty Bank has demonstrated steady growth in ESG-related assets, particularly through the expansion of green lending. Although a formal quantitative target for ESG-related asset share has not yet been publicly set, the Bank is working toward increasing the proportion of green and sustainable finance in its portfolio, as outlined in its Green Finance Strategy and Climate Transition Plan developed in 2024. The development trend reflects a strategic shift toward aligning financial activities with ESG principles and mitigating environmental and social risks. Enhanced due diligence for high-risk clients and regular monitoring processes help minimize exposure to ESG-related risks as the portfolio grows. Going forward, the Bank plans to define measurable ESG targets and track performance through improved internal reporting tools, including climate risk reporting and GHG emissions tracking, to better manage both opportunities and associated risks.	-
Other relevant information	-	-

## Disclosure on Principal Risks and Management

Please provide ESG related information regarding the entity's principal ESG risks and how those risks are managed and mitigated. The form should be filled out in accordance to the NBG's ESG Reporting and Disclosure Principles. Please note that the questions below are non-exhaustive and are provided for general guidance.

Questions	Answer	Additional Comments
Describe the entity's processes for identifying and assessing ESG risks over the short, medium, and long term and disclose how the entity defines short, medium, and long term.	ESG risk management is conducted in accordance with the Bank's established policies and procedures. The Risk Department and the Board of Directors are responsible for overseeing the Bank's risk management and internal control systems.	–
Describe the principal ESG risks the entity has identified over the short, medium, and long term and any assumptions that have been made when identifying these risks.	The Liberty Bank ESG Policy Paper identifies the following types of risks: liability, financial, reputational, credit, and market risks. Short-term risks include liability and financial risks, medium-term risks encompass reputational and credit risks, while long-term risks are primarily market-related.	–
Describe processes for managing ESG risks and how the entity is managing the particular ESG risks that it has identified.	The above risks are regulated by the ESG risk assessment procedure.	–
Describe how processes for identifying, assessing, and managing ESG risks are integrated into the entity's overall risk management.	Liberty Bank adheres to IFC standards in its operations. According to our policy, ESG risks are categorized into three levels: LOW, MEDIUM, and HIGH. Specific lists define the criteria for each category and the associated activities. For example, if a client is classified as HIGH risk, the due diligence process continues, with monitoring carried out annually and, in some cases, quarterly by external parties. In such cases, contractual obligations include the implementation of mitigation or compensatory measures in response to violations identified during due diligence and site visits, which are incorporated into the contract through an Environmental and Social Action Plan. Clients categorized as MEDIUM risk are contractually required to fully comply with environmental, occupational health and safety, and social legislation. For LOW risk clients, risks are assessed prior to any decision-making, and in most cases, the potential for harm is minimal. This process is managed within our electronic system, which includes a partially automated component. Specifically, during the loan approval process, the ESG attribute is recorded separately and included in the official protocol.	–
Describe how the entity has assessed the exposure of financial assets and nonfinancial assets to ESG risks.	Risk assessment for financial assets is conducted in accordance with Liberty Bank's ESG policy, under which environmental, social, and governance risks are evaluated as part of the lending process.	–
Describe characterisation of the entity's ESG risks in the context of traditional industry risk categories such as credit risk, market risk and operational risk.	Types of E\&S Risks in Liberty Bank: -Liability Risk: Arises when the Bank takes ownership of collateral and becomes liable for a client's environmental or social violations, including fines and clean-up costs. -Financial Risk: Results from disruptions in a client's operations due to E\&S issues, which may affect loan repayment or reduce collateral value. -Reputational Risk: Stems from negative publicity related to a client's poor E\&S practices, potentially damaging the Bank's image and stakeholder trust. -Credit Risk: Occurs if a client cannot meet financial obligations due to E\&S-related costs, regulatory fines, or permit issues. -Market Risk: Arises from a decline in collateral value caused by environmental damage, such as site contamination.	–
Describe volume of the collateral highly exposed to ESG risks.	Currently, Liberty Bank does not record this type of information. However, there are plans to implement similar risk assessment practices in the future.	–
Other relevant information	–	–

## Disclosure on KPIs

Please provide ESG related information regarding the entity's principal ESG risks and how those risks are managed and mitigated. The form should be filled out in accordance to the *NBSG's ESG Reporting and Disclosure Principles*.

KPI	Unit of measure	Note	Answer	Comment
<b>Environmental</b>				
1 Volume of green loans issued during the reporting year (flow)	currency of issuance	Please, provide the definition of "green" used by the entity: if the entity issues green loans in different currencies, please report them separately for different currencies	904,000 GEL.	-
2 Share of green loans in the total loans issued during the reporting year	%		0.02%	-
3 Total amount of green loans, outstanding as of end of reporting year	currency of issuance	If the entity issues green loans in different currencies, please report them separately for different currencies	1,653,198	-
4 Share of green loans in the total outstanding portfolio as of end of reporting year	%		0.05%	-
5 Volume of green investment securities as of end of reporting year			-	-
6 Share of green investment securities in total amount of investment securities as of end of reporting year	%		-	-
7 Volume of green debt securities issued during the reporting year	currency of issuance	If the entity issues green debt securities in different currencies, please report them separately for different currencies	-	-
8 Share of green debt securities in the total debt securities issued during the reporting year	%		-	-
9 Total volume of green debt securities issued, outstanding as of end of reporting year	currency of issuance	If the entity issues green debt securities in different currencies, please report them separately for different currencies	-	-
10 Percentage of loans undergone ESG screening during the reporting year	%		27.48%	-
11 Percentage of loans that has been rejected based on ESG criteria during the reporting year	%	Percentage of those loans that have undergone ESG screening	-	-
12 Share of non-performing green loans in the total green loans as of end of reporting year	%	Non-performing loans - the sum of substandard, doubtful and loss loans	-	-
Does the entity use any of the following waste management policies:				
13 Reducing:	Yes/No		Reduction - Yes (paper, printer toner and cartridge, fluorescent tubes)	
Reusing:	Yes/No		Reuse - Yes (printer cartridges recharge)	-
Recycling:	Yes/No		Recycling - Yes (paper recycling)	
Composting:	Yes/No		Composting - no	
Other, please specify:				
14 Does the entity initiated any environmentally friendly activities (for example, introduction of EVs, rooftop PVs at local branches, better insulation for offices, etc.), please specify	Yes/No		Energy efficiency of offices has been improved due to the presence of double plastic windows and energy efficient lamps (99%), except this in each room, instead of individual primers, there are only 1 or 2 units - common primer	-
15 Gross GHG emissions (Scope 1, Scope 2 and Scope 3) for the reporting year	Metric tons of CO2 equivalent		Scope 1 - 3414191, Scope 2 - 34341 Scope 1 + Scope 2 = 344832	-
16 GHG emissions target, if any	Metric tons of CO2 equivalent achieved or % reduction, from 2019-2020		-	-
<b>Social</b>				
17 Diversity in the workplace - percentage of female employees as of end of the reporting year	%		70.19%	-
18 Diversity in the workplace - percentage of females in senior management as of end of the reporting year	%	senior management - board of directors, supervisory board	14.29%	-
19 Diversity in the workplace - percentage of females in middle management as of end of the reporting year	%	middle management - defined according to internal definition	50.97%	-
20 Diversity in the workplace - percentage of persons with disabilities employed as of end of the reporting year	%		0.66%	-
21 Diversity in the workplace - maturity of workforce as of end of reporting year		age structure/distribution - number of employees per age group:		
		<20	77	
		20-30	1438	-
		30-40	1996	
		40-50	831	
		>50	685	
22 Training & education - share of employees who have received the trainings during the reporting year	%		54.00%	-
23 Training & education - average expenses on training per employee during the reporting year	GEL		58 GEL (internal) 530 GEL (external)	Expenditure per employee in internal trainings (2995 employees in total) Expenditures per employee in external trainings (507 employees in total)
24 Employee turnover rate	%	annual turnover rate = (number of employees who left) / (beginning + ending number of employees) / 2	21.88%	-
25 Parental leave - total number of employees that took parental leave during the reporting year			456	-
26 Parental leave - average length of parental leave during the reporting year	Days		293	-
27 Customer privacy - total number of complaints received concerning breaches of customer privacy during the reporting year		Please, report separately for individuals and legal entities	Customer privacy (for individuals) - 2	
28 Customer privacy - total number of identified leaks, thefts, or losses of customer data during the reporting year		Please, report separately for individuals and legal entities	0	
29 Customer satisfaction - does the entity conduct surveys on customer satisfaction?	Yes/No		Yes	
30 Customer satisfaction - percentage of total customers surveyed comprising satisfied customers during the reporting year	% CSAT (Customer Satisfaction score)		96.40%	
31 Human rights - Accessibility of facilities, documents and websites to people with disabilities		Describe how the facilities, documents and websites are adapted to ensure their accessibility for employees, as well as for customers with disabilities	Liberty Bank has introduced a new project to enhance accessibility for people with disabilities. The initiative includes the development of a policy document that outlines the bank's vision and approach regarding this matter. Additionally, a new communication protocol for interacting with people with disabilities has been established, and the service procedure has been updated to align with international and Georgian legal requirements. Plans are underway to adapt certain branches, and staff training sessions have already commenced. A comprehensive training program for all frontline staff is also planned. Furthermore, the queue management system in certain branches now includes a priority service option for people with disabilities, directing them to designated staff members. The bank has 15 ATMs adapted for the visually impaired.	
32 Human rights - Number of grievances about human rights impacts filed, addressed, or resolved during the reporting year		Please, report separately for individuals and legal entities	There were no cases of human rights violations during the reporting period.	
33 Share of social/sustainable loans in the total outstanding portfolio as of end of reporting year	%		-	
34 Volume of social/sustainable investment securities as of end of reporting year		Please, provide the definition of "social/sustainable" used by the entity	-	
35 Share of social/sustainable investment securities in total amount of investment securities as of end of reporting year	%		-	
36 Workplace health and safety - does the entity have workplace health and safety policies and procedures? Please, provide details.	Yes/No	This may include emergency response training, first aid and fire safety training, good workplace culture, overtime practices, and healthy office buildings, etc	Liberty Bank engaged a contractor company to conduct risk assessments for a healthy and safe workplace environment and provide training on emergency and fire management procedures. Microclimate measurements were conducted, revealing no abnormal indicators. Additionally, compensation for overtime hours is provided for in the bank's corporate guidelines, with the company responsible for payment of these hours.	
<b>Governance</b>				
37 Expenses and fines on filings, law suits related to anti-competitive behavior, anti-trust and monopoly practices during the reporting year	GEL		248189	
Does the entity have the following policies in place:				
38 Anti-bribery policy;	Yes/No		Yes	
Anti-corruption and anti-money laundering policy;	Yes/No		Yes	
Policy towards business integrity;	Yes/No		Yes	
39 Ethics policy;	Yes/No		Yes	
Is there a designated officer/body responsible for overseeing environmental and social policies and practices?	Yes/No		Yes, Liberty Bank appointed an ESG Risk Manager in September 2021.	-
40 Does board approve both the ESG strategy and policies?	Yes/No		Yes, Liberty Bank adopted an ESG policy approved by the board in December 2021.	-
41 Are there processes for consultation between stakeholders and the board of directors (supervisory board) on environmental and social topics?	Yes/No		No	-