



UNEP FI
Principle of Responsible
Banking Reporting and
Self-Assessment
2021



Reporting requirements for Signatories of UNEP FI Principles for Responsible Banking

The Principles reinforce Polaris Bank’s commitment to the Paris Climate Agreement and the United Nations Sustainable Development Goals (SDGs) that inform our Sustainability Strategy, targets, and commitment to transparency.

To communicate the progress achieved with respect to the PRB, we have adopted the UNEP FI - PRB self-assessment reporting template shown below.

The Bank has up to four years from signing to bring its reporting fully in line with the requirements.

Reporting and Self-Assessment Requirements	High-level summary of bank’s response (limited assurance required for responses to highlighted items)	Reference(s)/ Link(s) to bank’s full response/ relevant information
<p>Principle 1: Alignment We will align our business strategy to be consistent with and contribute to individuals’ needs and society’s goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement and relevant national and regional frameworks.</p>		
<p>1.1 Describe (high-level) your bank’s business model, including the main customer segments served, types of products and services provided, the main sectors and types of activities, and where relevant the technologies financed across the main geographies in which your bank has operations or provides products and services.</p>	<p>Polaris Bank’s strategic thrust is to be a digitally-led Retail Bank focusing on growth sectors in the Commercial and Corporate Banking space while playing cautiously in the Public Sector arena. As a retail Bank, we are extensively leveraging technology to drive the individual (with focus on HNIs) and SME banking segments of our business. We also drive the commercial banking end of the business with products and services tailored to meet the unique needs of our focus segments.</p> <p>This corporate goal is driven through our strategic network of business locations nationwide, with an array of liability and loan products. Our offerings cover all customer segments, business sectors, social class, age, gender etc. including Polaris Rainbow accounts (for children) and Polaris Seniors account for the Senior citizens.</p>	<p>See- “Products and Innovation” on page 26, “IT Infrastructure Refresh/ Digital Transformation” on page 27 “Products and Services” from Page 169 – 162 of our 2021 Annual Report https://drive.google.com/file/d/1q5BEOkX05h7RE5UFDo5naUGYOxC0Hr9M/view</p>

	<p>We have been driving more financial inclusion through “SurePadi”, our agency banking services. Other key products that were reviewed and enhanced included the Health Sector Loan, Polaris Naira Credit cards, Education Loan, Asset acquisition loans, automated PayDay, Personal loans (for salary earners) and a collateral-free cash flow-based lending for businesses targeted at the SME market segment, the Polaris Business Loan.</p> <p>As we continue to transform digitally and put more of our products and services on our numerous digital and electronic banking platforms, we are continuously pruning our physical business locations, from 270 across the country to 224 as at the time of this report.</p> <p>We will continue to invest in and upgrade our I.T infrastructure, strengthen cybersecurity, our digital delivery capacity across the enterprise, and automate our processes to support the corporate aspirations.</p>	
<p>1.2 Describe how your bank has aligned and/or is planning to align its strategy to be consistent with and contribute to society’s goals, as expressed in the Sustainable Development Goals (SDGs), the Paris Climate Agreement, and relevant national and regional frameworks.</p>	<p>The activities of the Bank are organized around three (3) Cardinal Principles that are underpinned by long-term economic and financial stability. These include: Responsible Banking, Sustainable Economic Growth and Community Investment. We are an equal-opportunity and inclusive environment that does not discriminate on the basis of religion, gender or ideological differences. Hence, every business activity that the Bank finances is anchored on the Sustainable Banking Principles.</p> <p>From climate change to social inequality, to financial inclusion, and other numerous challenges facing our society today. All of these are entrenched in the policy documents and governance framework of the Bank.</p>	<p>See - “Sustainability Report” from Page 23 - 29 of our 2021 Annual Report https://drive.google.com/file/d/1q5BE0kX05h7RE5UFD05naUGYOxCOHr9M/view</p>

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	<p>Polaris Bank is committed to contributing to solutions that address these issues, as we have a robust environmental and social impact (E&S) assessment framework for gauging this.</p> <p>The Bank is also a signatory to the United Nations Environmental Program – Finance Initiative (UNEP-FI), the coordinating body for sustainable banking practices.</p>	
<p>Principle 2: Impact and Target Setting</p> <p>We will continuously increase our positive impacts while reducing the negative impacts, and managing the risks to people and environment resulting from our activities, products and services. To this end, we will set and publish targets where we can have the most significant impacts.</p>		
<p>2.1 Impact Analysis:</p> <p>Show that your bank has identified the areas in which it has its most significant (potential) positive and negative impact through an impact analysis that fulfils the following elements:</p> <ol style="list-style-type: none"> Scope: The bank’s core business areas, products/services across the main geographies that the bank operates in have been as described under 1.1. have been considered in the scope of the analysis. Scale of Exposure: In identifying its areas of most significant impact the bank has considered where its core business/its major activities lie in terms of industries, technologies and geographies. Context & Relevance: Your bank has taken into account the most relevant challenges and priorities related to sustainable development in the countries/regions in which it operates. Scale and intensity/salience of impact: In identifying its areas of most significant impact, the bank has considered the scale and intensity/salience of the (potential) social, economic and environmental impacts resulting from the bank’s activities and provision of products and services. 	<p>To further reduce financial exclusion which is currently over 36% in Nigeria and enable economic activities that create shared prosperity for current and future generations as well as support the minority and underserved audience across the nation, the Bank has implemented the following initiatives;</p> <p>Financial Inclusion</p> <ul style="list-style-type: none"> We launched our agency banking digital service, ‘SurePadi,’ to reach the unbanked and underbanked, as well as to deepen financial inclusion across Nigeria. Through partnerships with existing and new retail outlets, SurePadi has provided convenient and easy access to funds and other banking services in impoverished neighborhoods. Since its inception in 2019, we have grown to 20,079 Surepadi agents nationwide. The Bank has also continued to promote the VULTe app, our leading digital platform, to make it easier for the diverse community to open and use accounts. To demonstrate Polaris Bank’s continued commitment, we have collaborated and conducted regular campaigns to raise awareness and educate young Nigerians through seminars in primary and secondary schools across the various geopolitical zones in the country. Numerous Educational materials and customized 	<p>See - “Responsible Banking” from page 25 See - “Sustainable Economic Growth” from Page 25 “Community Investments” from page 27-28 of our 2021 Annual report https://drive.google.com/file/d/1q5BEOkX05h7RE5UFDo5naUGYOxC0Hr9M/view</p>

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<p>(your bank should have engaged with relevant stakeholders to help inform your analysis under elements c) and d))</p> <p>Show that building on this analysis, the bank has</p> <ul style="list-style-type: none"> • Identified and disclosed its areas of most significant (potential) positive and negative impact • Identified strategic business opportunities in relation to the increase of positive impacts / reduction of negative impacts 	<p>savings tips were also distributed to the students to strengthen the learning experience. Within the year under review, the Bank visited schools in all the 36 states including FCT where we organized Financial Literacy session to further deepen financial inclusion, especially among the youth population, during the Global Money Week reaching over 5,000 students and 4,371 young people during the World Savings Day.</p> <p>Women Empowerment</p> <p>- We have created a roadmap of activities to promote gender balance and bridge the inequality gap due to our core focus on promoting gender inclusion and equity internally amongst stakeholders and externally to our customers. Over the year, we facilitated free financial and investment trainings & webinars for women aged 18-45 through our gender based product, Polaris Pearl.</p> <p>Environmental and Social Footprint</p> <p>- In order to manage the environmental impact of the Bank’s activities, the Bank has continuously reduced carbon emission to the environment by reducing our dependence on fossil fuels. This is evident in the Bank’s drive for the use of alternate energy source i.e. Solar Energy to power security lights, ATMs and some business locations Bank wide. We also successfully implemented an automated system creating an electronic alternative to paper output by fully optimizing digital receipts and internal memos to reduce carbon footprints which mitigates the risk of waste generation while ensuring our business strategy contributes to individuals’ needs and societal goals. In the first 2 months of implementation, we achieved a 50% reduction in paper consumption which was also largely contributed to by reducing our print frequency, consolidating print output, re-using print paper and implementing sustainable practices and guidelines.</p>	

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<p>2.2 Target Setting: Show that the bank has set and published a minimum of two Specific, Measurable (can be qualitative or quantitative), Achievable, Relevant and Time-bound (SMART) targets, which address at least two of the identified “areas of most significant impact”, resulting from the bank’s activities and provision of products and services.</p> <p>Show that these targets are linked to and drive alignment with and greater contribution to appropriate Sustainable Development Goals, the goals of the Paris Agreement, and other relevant international, national or regional frameworks. The bank should have identified a baseline (assessed against a particular year) and have set targets against this baseline.</p> <p>Show that the bank has analysed and acknowledged significant (potential) negative impacts of the set targets on other dimensions of the SDG/climate change/ society’s goals and that it has set out relevant actions to mitigate those as far as feasible to maximize the net positive impact of the set targets.</p>	<p>At Polaris Bank, the focus on environmental sustainability has been reinforced in recent years. This is demonstrated in our drive to raise consciousness about the environment internally within the Bank, and with our partners in the public and private sectors. Our environmental sustainability drive extends to Water & Energy Saving, Reduction of Carbon Footprint, Paper Reduction amongst others.</p> <p>Polaris Bank is committed to continuously reducing carbon footprints by reducing the use of paper while at the same time tracking our printing costs. The Bank has also reduced its negative impact on the environment by reducing pollution caused by diesel usage through the use of alternative sources of energy. More business locations/ATMs are being solar-powered whilst also maintaining strict early closure across all branches nationwide to reduce energy consumption and carbon emission.</p> <p>An important lesson the COVID-19 pandemic has offered the Bank are the numerous opportunities for improving environmental sustainability. For instance, we have new knowledge of what can be achieved digitally around remote working, education, banking, and more. As a responsible organization committed to environmental sustainability, we have applied these lessons in our business activities and operations and will continue to take deliberate actions to mitigate the impacts of our business activities on climate change and global warming. Another primary focus of the Bank is to ensure that our vendors are brought up to speed in our environmental sustainability journey.</p>	<p>See - “Environmental Responsibility” on Page 25 of our 2021 Annual report https://drive.google.com/file/d/1q5BE0kX05h7RE5UFD05naUGYOxCOHr9M/view</p>

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	<p>In line with this, we organized Environmental & Social risk management training for the Bank's active vendors, focusing on general environmental and social risk awareness, as well as the Bank's environmental and social risk management process, and relevant environmental guidelines, standards, and requirements. They were taught how to detect, reduce, and evaluate environmental and social hazards by employing techniques based on international best practices. The Bank's attention to environmental preservation reflects in its steady commitment to mitigating and reducing to the barest minimum the impact on the environment arising from its business decisions. The training sessions adequately prepared them to implement proper E&S procedures within their organization and when providing services to the Bank. We will continue to reskill and upskill our active vendors for the future by offering more learning opportunities</p>	
<p>2.3 Plans for Target Implementation and Monitoring</p> <p>Show that your bank has defined actions and milestones to meet the set targets.</p> <p>Show that your bank has put in place the means to measure and monitor progress against the set targets. Definitions of key performance indicators, any changes in these definitions, and any rebasing of baselines should be transparent.</p>	<p>To achieve our objectives, we have implemented our commitment to these Principles through effective governance and a culture of responsible banking. We incorporate sustainability regulation teams with representation from key stakeholder departments (ie Internal Audit, Compliance & Risk Management) to monitor target setting, manage the risks to people and environment resulting from our activities, products and services and ensure periodic review of our individual and collective implementation of the Principles to achieve transparency and accountability for our impact and contribution to society's goals.</p>	<p>See - "Responsible Banking" on Page 23 of our 2021 Annual report https://drive.google.com/file/d/1q5BEOkX05h7RE5UFDo5naUGYOxCOHr9M/view</p>

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<p>2.4 Progress on Implementing Targets</p> <p>For each target separately: Show that your bank has implemented the actions it had previously defined to meet the set target.</p> <p>Or explain why actions could not be implemented / needed to be changed and how your bank is adapting its plan to meet its set target.</p> <p>Report on your bank’s progress over the last 12 months (up to 18 months in your first reporting after becoming a signatory) towards achieving each of the set targets and the impact your progress resulted in. (where feasible and appropriate, banks should include quantitative disclosures)</p>	<p>We have implemented the initiatives listed above and made progress in deepening our financial inclusion strategy and environmental preservation/responsibility;</p> <ul style="list-style-type: none"> - Our environmental sustainability efforts include water and energy conservation, carbon footprint reduction, and paper reduction, among other things. Polaris Bank is committed to continuously reducing carbon footprints by reducing paper use while tracking printing costs. The Bank has also reduced its environmental impact by reducing pollution caused by diesel use through the use of alternative energy sources. More business locations/ ATMs are becoming solar-powered, while all branches nationwide maintain a strict early closing time to reduce energy consumption and carbon emissions. - Polaris Bank is also committed to continuously reducing its negative impact on the environment by reducing pollution caused by diesel usage through the use of alternative sources of energy and more business locations/ATMs are being solar-powered. - An important lesson the COVID-19 pandemic has offered individuals, governments, and institutions is the numerous opportunities for improving environmental sustainability. We have new knowledge of what can be achieved digitally around remote working, education, banking, and more. As a responsible organization committed to environmental sustainability, we have applied these lessons in our business activities and operations and will continue to take deliberate actions to mitigate the impacts of our business activities on climate change and global warming. - Another major milestone of the Bank was educating our vendors about our environmental sustainability journey. 	<p>See - “Environmental Responsibility” on Page 25-26 of our 2021 Annual report https://drive.google.com/file/d/1q5BEOkX05h7RE5UFDo5naUGYOxCOHr9M/view</p>

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	<p>A virtual environmental and social risk management training was held for the Bank's active vendors which focused on general environmental and social risk awareness, the Bank's environmental and social risk management process, and relevant environmental guidelines, standards, and requirements. They were taught how to identify, reduce, and assess environmental and social hazards using global best practices. The Bank's attention to environmental preservation reflects in its steady commitment to mitigating and reducing to the barest minimum the impact on the environment arising from its business decisions. The training sessions adequately prepared them to implement proper E&S procedures within their organization and when providing services to the Bank. We will continue to reskill and upskill our active vendors for the future by offering more learning opportunities.</p>	
<p>Principle 3: Clients and Customers We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.</p>		
<p>3.1 Provide an overview of the policies and practices your bank has in place and/or is planning to put in place to promote responsible relationships with its customers. This should include high-level information on any programmes and actions implemented (and/or planned), their scale and, where possible, the results thereof.</p>	<p>Polaris is a customer centric institution – we always want to improve our customers' experience, meet their needs, improve their business, ensure the protection of their interest on all fronts and across all customer categories - Corporates, Commercial and SME, individuals and the public sector.</p> <p>Some of the initiatives / policies / practices towards improving the experience of our customers include:</p> <ul style="list-style-type: none"> - We are committed to constantly ensuring we deliver an enjoyable and satisfying banking experience to our customers. - Continuous provision of end-to-end self-serviced channels to allow our customers serve themselves when, where and how they want to be served. 	<p>See - "Products and Innovation" on page 26-27, "Digital Business" on Page 27 "Customers Complaints & Petitions" on page 31 of our 2021 Annual report https://drive.google.com/file/d/1q5BEOkX05h7RE5UFDo5naUGYOxCOHr9M/view</p>

	<p>- Our operations are wholly guided by all the provisions of Consumer Protection regulations for products we offer, and services rendered</p> <p>- We have robust channels in place to address and resolve customers' complaints and feedback within stipulated time frame.</p>	
<p>3.2 Describe how your bank has worked with and/or is planning to work with its clients and customers to encourage sustainable practices and enable sustainable economic activities. This should include information on actions planned/implemented, products and services developed, and, where possible, the impacts achieved.</p>	<p>The Bank has Environmental and Social (E&S) Policy and Assessment Framework in place that guide the nature of business activities that we support and finance in order to ensure sustainability of the environment. The Bank also conducted Environmental & Social Risk Management Training for all its active vendors in the period under review. This was done to further entrench sustainable practices in their business dealings with the Bank. We don't support or fund any project / initiative that do not conform to the provisions of sustainable banking principles. As a demonstration of our commitment to environmental protection, we are increasing the number of our business locations that are powered by renewable energy sources.</p>	<p>See- "Responsible Banking" on page 23-26 of our 2021 Annual Report. https://drive.google.com/file/d/1q5BEOkX05h7RE5UFDo5naUGYOxCOHr9M/view</p>
<p>Principle 4: Stakeholders We will proactively and responsibly consult, engage and partner with relevant stakeholders to achieve society's goals.</p>		
<p>4.1 Describe which stakeholders (or groups/ types of stakeholders) your bank has consulted, engaged, collaborated or partnered with for the purpose of implementing these Principles and improving your bank's impacts. This should include a high-level overview of how your bank has identified relevant stakeholders and what issues were addressed/results achieved.</p>	<p>Investing in communities where we operate is an integral part of our corporate strategy as a financial institution. This helps to foster good stakeholder relationship between us and our host communities. Our aim is to give back in a manner that ensures the greatest possible impact on our beneficiaries.</p> <p>During the reporting period (January 01, 2021 to December 31, 2021), we successfully implemented the following CSR projects in the areas of Health, Education, Women Empowerment and others:</p> <ul style="list-style-type: none"> • Partnered Pacegate Limited on Evolve CSR to provide school supplies to girls in 7 secondary schools across 3 geopolitical zones in Nigeria; • Organised Media Capacity Building webinar for Online Media Journalists on Cyber Crime Act covering: <ul style="list-style-type: none"> - The Cybercrime Law and You - Media Ethics in the Age of Online journalism; • Supported e-learning infrastructure/ facility upgrade. 	<p>See- "Corporate Social Responsibility" on page 28 and 61 of our 2021 Annual Report https://drive.google.com/file/d/1q5BEOkX05h7RE5UFDo5naUGYOxCOHr9M/view</p>

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	<ul style="list-style-type: none"> • Supported e-learning infrastructure/ facility upgrade. • Donated Breast Cancer Screening Machine — Versana Balance Series to Care Organisation Public Enlightenment (C.O.P.E), our NGO partner and organised a webinar; • Partnered the Green Girl initiative (subsidiary of Folio Media Group) on feminine hygiene campaign in 12 secondary schools in four (4) states (Kwara, Kogi, Gombe and Borno respectively) in North Central and North East of Nigeria as part of efforts to enable girl-child education; • Sponsored 200 Public Secondary School Student in Lagos State as Participants for The International Award for Young People Nigeria where the students are required to embark on projects that show leadership and influence within their community. This also includes training of 30 teachers from 10 schools as Award Leaders; • Sponsored 25 family business owners to a family business management seminar on “Managing the Family Business to Last Beyond the Founders: The Building Blocks”; • Commemorated World Environment Day in partnership with Lagos state Ministry of Environment; • Partnered Society Healthcare Organisation to organize Cervical Cancer Outreach that attracted over 1,000 beneficiaries in Jigawa State, north west of Nigeria; • Supported Department of State Service with 20 desktop computers to aid the agency’s objective of ensuring internal security; • Supported the CBN endorsed one-day summit by Bank CEOs organised by Vanguard Media Limited; • Supported the re-launch of CIBN Mentoring Scheme: The support helped to boost the scheme’s capacity to help young professionals by way of addressing some of the needs/gaps identified in the industry; 	

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	<ul style="list-style-type: none"> Sponsored the Annual Childhood Cancer Awareness Walk to create awareness on the prevalence of childhood cancer in commemoration of Childhood Cancer Awareness Month and provide support to children battling the ailment. 	
<p>Principle 5: Governance & Culture We will implement our commitment to these Principles through effective governance and a culture of responsible banking</p>		
<p>5.1 Describe the relevant governance structures, policies and procedures your bank has in place/is planning to put in place to manage significant positive and negative (potential) impacts and support effective implementation of the Principles.</p>	<p>Factors of Responsible Banking in terms of Culture: Polaris Bank is committed to developing inclusive and participatory tactics towards recognizing and adopting diversity of cultures in the workplace. This is exemplified by our non-discriminatory recruitment process across all ethnicity and localities in Nigeria. Also, applications for employment by people with disabilities are given careful attention.</p>	
<p>5.2 Describe the initiatives and measures your bank has implemented or is planning to implement to foster a culture of responsible banking among its employees. This should include a high-level overview of capacity building, inclusion in remuneration structures and performance management and leadership communication, amongst others.</p>	<p>Creating of a cohesive synergy between education and culture in the support for the educational sector by taking application of knowledge in the form of creativity, arts and technology to the grassroots for the development of community and enhancement of life skills.</p> <p>Propagating the importance of a healthy workforce as a state of complete physical, mental and social wellbeing. The Bank in collaboration with some Health Management Organizations (HMO), operates a structure in which employees are registered with hospitals under the insurance scheme to take care of various health issues and ailments for themselves and their listed dependants.</p> <p>Living our core values of continuous learning with the introduction of Professional Certification policy aimed at upskilling employees in their choice of educational endeavours.</p>	<p>See - “Responsible Banking” from page 24-28 of our 2021 Annual report. https://drive.google.com/file/d/1q5BEOkX05h7RE5UFDo5naUGYOxCOHr9M/view</p>

<p>5.3 Governance Structure for Implementation of the Principles</p> <p>Show that your bank has a governance structure in place for the implementation of the PRB, including:</p> <p>a) target-setting and actions to achieve targets set b) remedial action in the event of targets or milestones not being achieved or unexpected negative impacts being detected.</p>	<p>Governance is the practice of conducting business in accordance with high ethical standards, including those that address environmental and social issues. It also involves strict adherence to regulations and sound principles of transparency, responsibility, fairness, and efficiency.</p> <p>Polaris Bank’s sustainability approach is governed by the Board Finance & General Purpose Committee, which determines the Bank’s business priorities in terms of environmental, social, and ethical concerns. The committee, through the Board, Audit, and Risk Management committee, also incorporates the management and implementation of the Environmental and Social Risk Management policy into the Bank’s business decisions.</p> <p>In terms of Environmental, Social, and Governance (ESG), the Bank has consistently maintained a strong management system by reviewing its Risk Assessment Toolkit to ensure compliance with industry and international best practices. It was built on the Bank’s business principles and underlying commitment to human rights and environmental protection.</p>	<p>See - “Governance” on Page 23 “Corporate Governance” on page 38 of our 2020 Annual report https://drive.google.com/file/d/1q5BE0kX05h7RE5UF-Do5naUGYOxCOHr9M/view</p>
<p>Principle 6: Transparency & Accountability We will periodically review our individual and collective implementation of these Principles and be transparent about and accountable for our positive and negative impacts and our contribution to society’s goals.</p>		
<p>6.1 Progress on Implementing the Principles for Responsible Banking</p> <p>Show that your bank has progressed on implementing the six Principles over the last 12 months (up to 18 months in your first reporting after becoming a signatory) in addition to the setting and implementation of targets in minimum two areas (see 2.1-2.4).</p> <p>Show that your bank has considered existing and emerging international/regional good practices relevant for the implementation of the six Principles for Responsible Banking. Based on this, it has defined priorities and ambitions to align with good practice. Show that your bank has implemented/is working on implementing changes in existing practices to reflect and be in line with existing and emerging international/regional good practices and has made progress on its implementation of these Principles.</p>	<p>In terms of Environmental, Social, and Governance (ESG), the Bank has consistently maintained a strong management system by reviewing its Risk Assessment Toolkit to ensure compliance with industry and international best practices. It was built on the Bank’s business principles and underlying commitment to human rights and environmental protection.</p> <p>Through efficient internal standards and external partnerships such as the United Nations Environment Programme Finance Initiative (UNEP-FI), International Finance Corporation (IFC), International Labor Organization (ILO), and Equator Principles, the portal is intended to ensure that the Banks’ risk management processes are aligned with international best practices.</p>	<p>See “Responsible Banking” on page 23 of our 2021 Sustainability Report. https://drive.google.com/file/d/1q5BE0kX05h7RE5UF-Do5naUGYOxCOHr9M/view</p>



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