Master's Thesis

The Sustainable Development Goals

The Missing Piece of the Reporting Puzzle?

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Abstract

The number of companies reporting on their Corporate Social Responsibility (CSR) efforts has increased over the years. Nevertheless, the quality of the reports has not increased with it according to a survey from the consultancy firm KPMG in 2015. The introduction of the Sustainable Development Goals (SDGs) could solve this by providing a common reference point and a standardised corporate reporting framework. Therefore, this thesis examines whether the introduction of the SDGs had an effect on the inter-firm comparability and how institutional isomorphism explains the reporting patters.

In answering the research question, an analysis of inter-firm comparability was conducted on reports from the years before and after the introduction of the SDGs. In order to avoid distortion of the results from sector and regional differences, the reports of six European banks were chosen for the analysis. In addition, the theoretical concept of isomorphism as coined by DiMaggio and Powell (1983) structured the discussion, which also included an interview with a CSR expert.

The analysis revealed that the introduction of the SDGs had no effect on the inter-firm comparability on the selected CSR reports for both reporting years. Inter-firm comparability is not present, as the majority of banks either do not report the required information or do not report at all.

In explaining the reporting pattern of the banks, the European Union with its new Directive on the reporting on non-financial information and the investors of the banks were considered to be the source of coercive pressures. The two sources of normative pressures were found to be the effect of national cultures and the exclusion of financial employees in the report preparation processes. The latter is considered to be the main reason for the lack of good quality CSR data. In terms of mimetic pressures, the goal ambiguity of the SDGs and the lack of guidelines are considered to be the main sources of this type of pressures to the convergence of CSR reports.

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Abbreviations list

CSA – Corporate Sustainability Assessment

CSR – Corporate Social Responsibility

DJSI – Dow Jones Sustainability Index Series

DMA – Disclosure on Management Approach

ESG – Environmental, Social and Governance

EU – European Union

FSSD – Financial Services Sector Disclosures

GHG – Greenhouse Gas

GRI – Global Reporting Initiative

GWP – Global Warming Potential (rate)

IASB – International Accounting Standards Board

IFRS – International Financial Reporting Standards

IIRC – International Integrated Reporting Council

MDG – Millennium Development Goals

MSA – Media and Stakeholder Analysis

R&D – Research and Development

SASB – Sustainability Accounting Standards Board

SD – Sustainable Development

SDG(s) – Sustainable Development Goal(s)

TBL – Triple Bottom Line (approach)

TCFD – Taskforce on Climate-related Financial Disclosures

TSS – Total Sustainability Score

UN – United Nations

1. Introduction

Reporting on Corporate Social Responsibility (CSR) is becoming mainstream amongst large corporations, as the majority now produce CSR reports. 92 per cent of the Global Fortune 250 companies produce CSR reports, whereas the number is 73 per cent for largest 100 companies in each of 49 countries according to the survey by the consultancy firm KPMG in 2015 (KPMG, 2015). Nevertheless, quantity has not guaranteed quality, as the quality of the reports from the world's largest organisations did not improve (KPMG, 2015).

This lack of quality in CSR reporting threatens the inter-firm comparability of CSR reports. Inter-firm comparability is crucial, as the credibility assigned to these reports rest on the assumption that it is possible to measure and compare the sustainability performances of companies (Boiral & Henri, 2015). The publication of different rankings on the sustainability performances of companies demonstrates the need for its measurement and comparability (Boiral & Henri, 2015). This is becoming an increasing concern for corporate clients and the public, as inter-firm comparability of sustainability performances is the key to determine the best-in-class companies (Boiral & Henri, 2015). Despite the active effort of different organisations, such as the Global Reporting Initiative (GRI), to create common frameworks for CSR reporting, it has not been possible so far to compare the reports of different companies and thereby determine who is performing well and who is not (Boiral & Henri, 2015).

The lack of inter-firm comparability in CSR reports may have been due to the lack of a common reference point of sustainable development (SD) and a lack of common goals and targets (Searcy, Swanson, & Bizikova, 2015). With the introduction of the Sustainable Development Goals (SDGs) by the United Nations (UN) this reference point is provided and widely accepted goals and targets are introduced (Searcy et al., 2015). The SDGs thus provide the basis for more standardised corporate reporting (Searcy et al., 2015). Furthermore, the SDGs provide a common language for reporting and a framework that could shape the priorities of the reporting narrative and the performance disclosures of organisations (Global Reporting Initiative, United Nations Global Compact, & World Business Council for Sustainable Development, 2015b).

The UN recognises and emphasises the role of businesses in achieving the SDGs and are encouraging them to act and report on the SDGs (United Nations, 2016). Some companies responded to the UN's call for action and started reporting on the SDGs.

As the SDGs could provide the basis for more standardised reporting through their targets and goals, this standardisation effect could enable the inter-firm comparability of CSR reports. Inter-firm comparability is crucial in benchmarking and assessing the CSR performances of companies and, therefore, to differentiate between high and low performers.

As a result, of the situation described above, this thesis proposes the following research question is proposed: ***What is the effect of the introduction of the SDGs on inter-firm comparability of CSR reports, and how does isomorphism explain the reporting pattern?***

The research question warrants an analysis of inter-firm comparability in CSR reports by researching whether information in these reports fulfil the reporting requirements of selected indicators. These indicators were chosen from the GRI G4 Guidelines, as the GRI guidelines are the most used guidelines for non-financial reporting. Moreover, in discussion of the empirical findings of inter-firm comparability, isomorphism is used to guide the discussion in order to explain the reporting pattern. The purpose of the research of this thesis is therefore both exploratory and explanatory, as it first establishes whether there has been an effect of the introduction of the SDGs on CSR reports, and, second, uses the theoretical concept of isomorphism to explain the empirical findings regarding inter-firm comparability in CSR reports.

In answering the research question the thesis proposes four sub-questions that are answered in separate chapters. These sub-questions are listed below along with their rationale.

1. *What is inter-firm comparability*?
   Answering this question will provide the definition of inter-firm comparability. It is necessary to know what inter-firm comparability is in order to determine its presence in CSR reports. Chapter 5 in the thesis explore this concept by drawing on the definitions by the GRI, the International Integrated Reporting Council (IIRC), the Sustainability Accounting Standards Board (SASB) and the European Union (EU) and how comparability is considered in the selection of companies to the Dow Jones Sustainability Index Series (DJSI).

2. *How are the SDGs related to the banking sector?*

   The intention of this sub-question is to understand how the SDGs are relevant to the selected sector of the reports in the analysis. This understanding provides the foundation for the selection of the SDGs and their indicators included in the analysis. Chapter 6 answers this question by introducing the SDGs and their relation to GRI. In addition, the banking sector is described and its CSR practices are discussed in relation to the SDGs and recent sustainability events.

3. *What is the effect of the introduction of the SDGs on inter-firm comparability of CSR reports?*

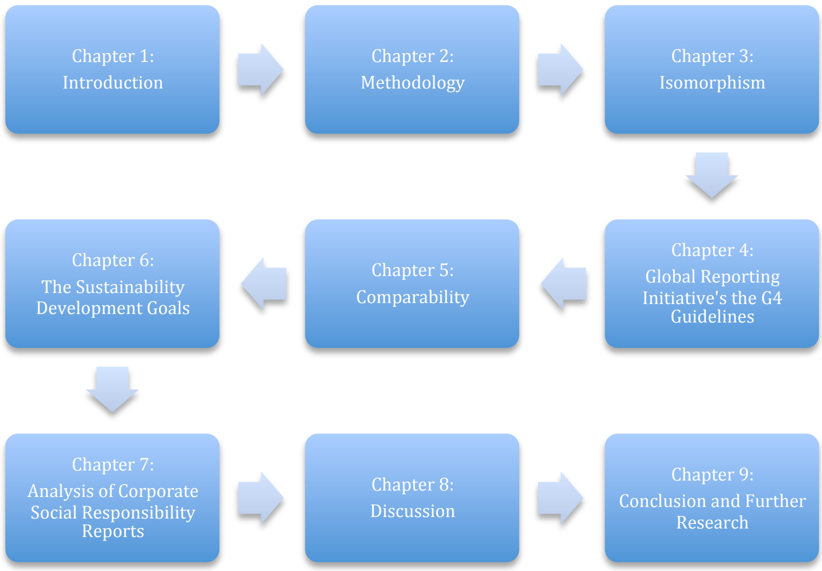
   This sub-question provides the answer to the first part of the research question that is whether the SDGs had an effect on the inter-firm comparability in CSR reports. Chapter 7 provides an analysis of this where first, the accounting policies applied by the reporting entities are examined. Second, the material aspects considered by the reporting entities are inspected along with how the reporting entities define the boundaries of these aspects and their approach to stakeholder inclusion. Third, the analysis of inter-firm comparability is conducted by examining the information in the reports against the requirements of selected GRI G4 Indicators. This is performed for each indicator for the reporting years 2014 and 2015.

4. *How does isomorphism explain the reporting pattern?*

   This sub-question answers the second part of the research question by discussing the empirical findings of the analysis using the theoretical concept of isomorphism as guidance. Chapter 8 includes the discussion of the coercive, normative and mimetic pressures for isomorphism.

The structure of thesis follows the stages of the research process steered by the research question as illustrated by Figure 1.

Figure 1.



1.1. Delimitations

First of all, it is necessary to state that the purpose of the thesis is not to establish a direct link between the SDGs and inter-firm comparability, but to examine whether the introduction of the SDGs affected the inter-firm comparability of CSR reports. Thus, this thesis examines whether there is a correlation between the introduction of the SDGs and inter-firm comparability, but not causation.

Another delimitation is that as CSR reports created following the GRI G4 Guidelines are the selected unit of analysis then reports prepared following different reporting frameworks or other ways of exploring inter-firm comparability of CSR reports are not included in this thesis.

Moreover, the thesis does not have a particular stakeholder in mind when considering inter-firm comparability, as it is the effect of the SDGs that is investigated. Therefore, indicators are not selected based on stakeholder priorities but on the basis of the relevance of the SDGs to the banking sector.

Also, the thesis includes only the concept of isomorphism as coined by DiMaggio and Powell in the discussion of the empirical findings and not any other interpretations of isomorphism or other concepts related to new or old institutional theory.

2. Methodology

This chapter presents the methodological choices made during the research process of this thesis. First, the research philosophy applied in the research process is discussed. Second, the research design is examined along with the descriptions of the data, how it was collected, and how data analysis was performed and a discussion of the reliability and validity of the data. The chapter concludes with reflection on limitations to the research design and the methods applied in the thesis.

2.1. Research Philosophy

The research philosophy of the thesis is that of pragmatism as the important determinant of the position of the researcher is the research question (Saunders, Lewis, & Thornhill, 2012). It is also due to the use of a mixed methods research approach to answer the research question. Moreover, the researcher recognises that there are other ways to interpret the world and other ways in which to answer the research question, as there is no single point of view that will produce the entire picture (Saunders et al., 2012). Other research approaches to analyse the inter-firm comparability of firms could be through interviews of selected stakeholders, such as investors, NGOs, government representatives etc., and other theory could have guided the discussion of the findings of inter-firm comparability that could have produced another explanation. Nevertheless, the manner in which the research is conducted is considered to be the most appropriate to answer the research question.

2.2. Research Design

The research approach applied is the inductive approach where theory follows data (Saunders et al., 2012), as the thesis first uncovers whether there is an observed effect of the introduction of the SDGs on inter-firm comparability in CSR reports and then uses the concept of isomorphism to explain what drives the reporting pattern. Moreover, the inductive approach implies a sequential explanatory research design to be applied in order to answer the research question, which is considered appropriate for the research of this thesis.

2.2.1. Unit of Analysis

The units of the analysis are CSR reports produced using the GRI framework, more specifically the G4 Guidelines, which include the SDGs. Some of these reports are either a stand-alone report or an integrated report. Therefore, the annual reports are also included if the organisations state that they report on indicators there in their GRI Content Index (GCI). Only the CSR, integrated and annual reports are examined in the analysis, as these reports should be sufficient in enabling inter-firm comparisons. As a result of using these reports as unit of the analysis, the research strategy applied is the archival research strategy since the principal source of data is administrative records and documents (Saunders et al., 2012) – in this case CSR and annual reports. These reports are secondary data, and this type of data is what Saunders et al. (2012) classify as *"compiled data that have received some form of selection or summarising*" (Saunders et al., 2012, p. 307). Furthermore, the data are multiple source secondary data, as the reports contain different data sets combined into one before the researcher accessed these data (Saunders et al., 2012). Despite the reports being secondary data, they are: "*a product of day-to-day activities"* and, therefore, a: "*part of the reality being studied*" (Saunders et al., 2012, p. 179).

Using reports as the unit of analysis has its disadvantages due to it being secondary data. First, the data was not collected specifically with the aim of analysing inter-firm comparability in the reports. Second, the aggregations and definitions used in the reports may not be entirely suitable for the research of this thesis. Third, the researcher had no control over the quality of the data. Fourth, the presentation of the data might be affected by the original purpose of the reports to the companies publishing them. In using CSR reports created following the GRI G4 Guidelines, the first, second and fourth issues are dealt with, as the GRI G4 Guidelines aim to standardise CSR reporting. In terms of the quality of the reports, using only reports that have received external assurance and that are compliant with GRI would decrease the risk of reports being of poor quality. Nevertheless, reports are not guaranteed to be of high quality despite taking these precautions and, moreover, it is difficult to uncover whether the reported data represents the reality. As it is not the purpose of the research to uncover whether the reported information is true or not or to assess the quality of that information, it is assumed that the reported content represents the reality.

2.2.2. Data Collection

The sampling technique used to select the CSR reports in the analysis was a purposive homogenous sample. As the focus of the research is to analyse CSR reports in order to uncover whether the introduction of the SDGs had an effect the inter-firm comparability, the sample was collected using three criteria. First, the reports had to be prepared using the GRI G4 Guidelines and include the SDGs. Second, the sample had to be from the same sector in order to exclude the possibility of any sector effects distorting the results. In addition, reports had to be from the same sector, as these reports were more likely to focus on the same SDGs, as different SDGs are relevant to different sectors. Third, in order to decrease the effects of regional differences and to some extent the effects from different regulatory requirements, the sample had to be located within the same geographical area.

The reports were selected using the GRI database where the Financial Services sector contained the highest number of reports including the SDGs. However, as this sector includes both assets management, insurance companies and banks, the sample was further divided into these three categories where banks contained the highest number of reports including the SDGs. Finally, Europe was chosen as the geographical area as no single country produced a sufficient number of reports following the two first criteria. This led the sample to include the reports of six European banks of which five are located in member states of the European Union and one in Switzerland. Still, they are all to a certain extent subjected to the same legislation issued by the European Union. Nevertheless, there might be effects from different national regulatory requirements, however, these are assumed not to be of major importance. Table 19 showing the basic information about the selected reports for the analysis can be found in Appendix A.

For the discussion of the empirical findings, an interview was conducted with a Danish CSR expert to understand the different pressures for isomorphism in CSR reporting. The interview was semi-structured, as this was most appropriate due to the explanatory purpose of the discussion. Moreover, as isomorphic pressures formed the basis for the discussion of the empirical findings on inter-firm comparability these needed to be addressed in the interview, but at the same time in a manner were the reasons for CSR expert's opinions and attitudes could be understood (Saunders et al., 2012). In addition, a semi-structured interview presented the opportunity to further examine answers where the researcher wanted the CSR expert to explain or elaborate (Saunders et al., 2012). Finally, a semi-structured interview also allowed the discussion to go in a direction that was not anticipated by the researcher, but that was significant for the meaning of the understanding and helped addressing the research question or formulated a new such question (Saunders et al., 2012).

2.2.3. Analysis of Data

In the analysis of inter-firm comparability of the selected reports, both quantitative and qualitative data were used, as the different indicators made use of either type of data and in some cases applied both. The process for extracting the data for each indicator contained four steps. First, the GRI Content Index (GCI) was consulted to see where the information was included in the report and sometimes it was reported in the GCI. Second, if the information was not disclosed in the GCI, then the pages that it referred to were examined. Third, if the information was not found on these pages, then the content index of the report was consulted in order to identify the section where this information could have been included. Fourth, if the information still was not found, a search in the PDF using keywords was performed. Fifth, if that did not produce any results, then unexamined parts of the report were inspected. This process was performed for each CSR report in order not to omit any data that was not referred to correctly in the GCI. However, step five was not performed in the case of annual reports where the GCI referred to the CSR report. Annual reports were only consulted if the banks referred to them in the GCI. Only information that was considered relevant to the indicators was included, and in determining the relevance of the information, the G4 Implementation Guidelines of GRI was used. This implementation guide contained the detailed information about indicators and what data they required in order to assess the relevance of the reported information. In addition, in using the implementation guidelines of GRI the objectivity of the researcher was enhanced, as this standardised guide was used to guide decisions of what information to include.

Once the data was extracted from the reports, the raw information was plotted into tables, where one table contained the full information for one indicator. Some indicators had sub-categories, which amounted to as many as seven, and the information related to each part were put into their own cells in the table. Moreover, the table made use of two categories, which were a ‘content’ column containing the raw information, and a column used for the categorisation of that information. In the categorisation column, the disclosed information was assessed against the requirements of the relevant indicator, in order to determine the degree to which the information satisfied all the reporting requirements of the indicator.

The disclosed information was then classified into four categories: ‘Complete’, ‘Partially’, ‘In G4 Index, Not In Report’ or ‘Not’, and this classification was termed the level of information in the table. This was performed for each part of an indicator, and when the information for this part satisfied all the reporting requirements then this information would receive the classification ‘Complete’ in the table. If the information only satisfied some of the reporting requirements, then the information received the ‘partially’ classification. If the GCI stated that the indicator was included in the report but the disclosed information did either not satisfy the requirements or was absent all together, then it was categorised as ‘In G4 Index, Not In Report’. This classification was also applied when an organisation stated that they reported on an indicator in their GCI, but only reported on certain parts of the indicator. In this case, the parts that were unreported received the ‘In G4 Index, Not In Report’ classification. Finally, the last category, ‘Not’, covered the indicators that were not included because either the organisations stated in their GCI that they did not report on these indicators or if the indicators were not mentioned in the GCI. These tables containing the raw data can be found in Appendices L, M, N, O, P, Q, R, S, T, U, V, and W, where one appendix includes the tables of all the indicators selected for the analysis for a particular bank.

This data extraction process ensured that the data could be easily assessed, as this process quantified the disclosed qualitative data and translated and classified both qualitative and quantitative data by the degree to which they satisfied the reporting requirements of indicators.

The tables containing the raw information were then aggregated into tables where one table contained the classification of disclosed information by all banks for one indicator. These tables are included in Appendices J and K for readers to consult. The tables included in the analysis of inter-firm comparability were aggregated based on the information from these tables in Appendices J and K. The tables in the analysis summarised the classification of information at indicator level for all the different classification levels and were categorised by the business themes of SDGs, which the indicators were related to. The data was aggregated to an indicator level in the following manner. If an organisation reported information that satisfied all the requirements of all the parts of an indicator then they received the ‘Complete’ classification for the whole indicator. If an organisation reported information that satisfied the requirements for some parts of an indicator but not others, such as five out of six parts or even just one out of six parts, then this indicator received the 'Partially' classification. If the disclosed information of an organisation received the 'In G4 Index, Not In Report' classification for all parts of an indicator then this classification was used for the whole indicator in these tables. This was also the case with the 'Not' classification.

The qualitative data obtained from the semi-structured interview was audio-recorded as the interviewee granted permission for the interview to be recorded. The interviewee was informed about the purpose of the interview beforehand and about how the researcher intended to use the information obtained in the discussion of the empirical findings from the analysis. The interviewee was referred to as the CSR expert in the discussion and in the transcription in order to preserve the anonymity of the interviewee. This was not requested by the interviewee, but was deemed appropriate by the researcher. The transcribed interview can be found in Appendix Y for readers to consult.

2.2.4. Reliability and Validity of Data

This section discusses the validity and reliability of the data outlined above. The CSR, annual and integrated reports were the basis for the inter-firm comparability analysis and were therefore highly valid in answering the research question. Assessing the reliability of the data provided in these reports required access to the knowledge of the methods applied in collecting the data and these were not made publicly available by the reporting entities. It was therefore not possible to assess the data collection methods used for the creation of the reports, as these were not available to the researcher. Nevertheless, as this thesis examined whether the disclosed information satisfied the requirement of indicators, then these reports remained valid for the research question. Only CSR reports that were uploaded in the GRI database or found on the organisations' corporate websites were used as these were assumed to be the correct reports.

Other secondary resources that were used in this thesis were considered valid and reliable as these consisted of academic articles found using official databases such as EbscoHost or Google Scholar, news articles from reputable newspapers, non-financial reporting standards from the Global Reporting Initiative, International Integrated Reporting Council, Sustainability Accounting Standards Board and the European Union and information from the websites belonging to the

United Nations. Some secondary data sources coming from sustainability blogs that depicted the opinion of a sustainability expert did not necessarily represent a fully objective view of the reality. However, these sources were considered valid as they were used in the introduction to the research question and the critique sections in chapters 4 and 6, but were not included in the analysis or the discussion.

One of the issues relating to the reliability of the semi-structured interview used for the discussion was the lack of standardisation, as it was not certain whether other alternative researchers would deduce obtain the same information from the interview (Saunders et al., 2012). According to Saunders et al., (2012) this has to due with the issues of bias, and there were two potential biases that posed a threat to the reliability of the interview for this thesis. The first was the interviewer bias where the comments, tone or non-verbal behaviour of the interviewer could have resulted in a bias in the manner that the interviewee responded to questions (Saunders et al., 2012). The second, was the interviewee or response bias as this type of bias could be caused by perceptions of the interviewer or perceptions of interviewer bias by the interviewee (Saunders et al., 2012). Moreover, it was not necessarily linked to the perceptions of the interviewer or interviewer bias, but to the unstructured exploration of certain themes where the interviewee did not wish to reveal or discuss an aspect, as that person might have believed this would lead to revelation of sensitive information that the person did not wish to share (Saunders et al., 2012). In terms of issues regarding validity these related to the extent to which the researcher had gained access to the knowledge and experience of the interviewee, and whether the researcher was capable of detecting the meanings that the interviewee wanted to project from their use of language (Saunders et al., 2012).

The response to these concerns regarding reliability was that findings from the semi-structured interview were not intended to be repeated as it reflected the reality at the time it was collected (Saunders et al., 2012). In order to deal with the risk of bias in the interview, the researcher aimed to remain neutral and appropriate in behaviour, appearance, opening remarks, and in the questioning approach through the appropriate use of open, probing, specific and closed questions (Saunders et al., 2012). In terms of validity, the semi-structured interview was considered highly valid for the discussion, as the scope of the interview was to clarify questions that arose from the empirical findings regarding inter-firm comparability of CSR reports in relation to the theoretical concept applied in the discussion.

2.3. Limitations

There were four other limitations of the research in addition to those related to the use of secondary data as units of analysis of inter-firm comparability. The first limitation was the number of reports included in the analysis of comparability. As European banks had the highest number of reports created using the G4 Guidelines and including the SDGs, these were chosen as unit of analysis. Nevertheless, these amounted to only six, and a larger sample would have been desirable, but only reports from 2015 fulfilling the criteria for data selection were available at the time.

A second limitation of the research was that it only included information from annual reports, integrated reports and CSR reports in the analysis of inter-firm comparability. Information from other sources could have increased the level of information reported, as the GRI G4 Guidelines allowed organisations to reference other sources than the type of reports included in the data set. However, as these other sources consisted of URLS or other reports often with an enormous amount of information other than what was required by the indicators, these were not considered. In addition, as mentioned above the reports should enable comparisons on their own.

A third limitation was that the researcher of this thesis did not look beyond the CSR, annual or integrated reports to take into account the affects of social actors on the content of the reports, but merely accepted the reports as they were (Saunders et al, 2012). The analysis was performed with the assumption "*what you see is what you get*" (Saunders et al., 2012, p. 136) and that the disclosed information was unaffected by the employees that prepared the reports, as they were expected to adhere to their job descriptions and the standard operational procedures of their companies (Saunders et al, 2012). However, this might not always be the case.

2.4. Terminology Used in the Thesis

There were two terminologies that were used throughout this study, and this section clarifies how they were used in the thesis.

The first terminology that needs explanation is the use of reports or CSR reports. These two definitions include all the reports considered for the analysis. This means that when the thesis refers to CSR reports or simply reports, it refers to annual, CSR and integrated reports of the selected banks as if they were one report. Therefore, in chapters following this one no distinction will be made between these three types of reports as they are simply referred to as reports or CSR reports.

The second terminology is the use of the words inter-firm comparability and comparability. In chapter 5 comparability as a concept is discussed and its use in the analysis is defined. Therefore in that chapter several definitions are included but these are all clearly explained. As for the other chapters in the thesis, the words inter-firm comparability and comparability are used interchangeably but refer to the comparability of the disclosed information across banks.

3. Isomorphism

In this chapter, the theoretical concept of isomorphism is described, discussed and criticised in order to map out the theory used to structure the analysis of the empirical findings in the analysis chapter of this thesis.

3.1. Isomorphism

Isomorphism is the constraining process when a unit in a population is forced into becoming similar to other units facing the same type of environmental conditions (Hawley (1968) in DiMaggio & Powell, 1983). Here the units' organisational characteristics change in order to be compatible with the characteristics of their environment (DiMaggio & Powell, 1983).

There are two forms of isomorphism according to Powell and DiMaggio (1983); the competitive and the institutional isomorphism (DiMaggio & Powell, 1983). According to Hanna and Freeman (1977), competitive isomorphism is driven by a system rationality where market competition, niche change and fitness measures are emphasised (Hannan & Freeman (1977) in DiMaggio & Powell, 1983). However, competitive isomorphism only partially explains the bureaucratisation described by Max Weber and is more appropriate when free and open competition exists (Weber (1968) in DiMaggio & Powell, 1983).

DiMaggio and Powell (1983) emphasise institutional isomorphism in explaining the convergence of fields and organisations (DiMaggio & Powell, 1983). Institutional isomorphism argues that the major factors that organisations should be concerned with are other organisations, as they compete for resources, customers, political power and institutional legitimacy (DiMaggio & Powell, 1983). This means that organisations have to consider social fitness as well as economic fitness (DiMaggio & Powell, 1983). DiMaggio and Powell (1983) argued that there are three mechanisms of isomorphism, which are summarised below.

Coercive isomorphism stems from pressures put on an organisation by other organisations on whom the organisation depends (DiMaggio & Powell, 1983). The pressure can also stem from the cultural expectations to the organisation from the society in which they have substantial activities (DiMaggio & Powell, 1983). These pressures can either come from force, persuasion, requests for collaboration or they can be a direct result of a government mandate, such as the issue of new industry standards (DiMaggio & Powell, 1983). According to Weber (1968), in a complex, rationalised system of contract laws organisations need the right organisational tools to comply with the legal commitment (Weber (1968) in DiMaggio & Powell, 1983). As rationalised states or other organisations increase their supremacy in the area of social life, the structures of organisations will increasingly reflect the institutionalised and legitimated rules from and within the state (Meyer & Rowan (1977) in DiMaggio & Powell, 1983). Therefore, within certain areas organisations are increasingly homogenous, as they are planned around practices that conform to wider institutions (DiMaggio & Powell, 1983). Governments are not the only organisations to impose rules on other organisations. The rules or standard operating procedures could also come from a parent company, which for example imposes standard accounting on subsidiaries (DiMaggio & Powell, 1983). In addition, imposition may not be direct, but can also be indirect. When dealing with hierarchical organisations, egalitarian or collectivist organisations may need to obstruct a formally defined role with responsibility and managerial authority despite it going against the intention of their organisational structure (DiMaggio & Powell, 1983).

Uncertainty inspires organisations to imitate other organisations whom they perceive to be more successful or legitimate (DiMaggio & Powell, 1983). This is known as mimetic isomorphism, and imitation or modelling occurs from either poor understanding of organisational technologies, goal ambiguity or from symbolic uncertainty from the environment (DiMaggio & Powell, 1983). Modelling is an attractive manner in dealing with uncertainty or ambiguity, as it can yield a potential solution with little costs (Cyert & March (1963) in DiMaggio & Powell, 1983). Modelling might occur intentionally or unintentionally, direct or indirect, such as through employee turnover, industry trade associations or consulting firms (DiMaggio & Powell, 1983). In terms of organisational innovations, organisations usually adopt these to demonstrate their efforts in trying to improve in order to enhance legitimacy (DiMaggio & Powell, 1983). Another reason for homogeneity is that there is very little variation in options for organisations to select from and, therefore, organisations model themselves upon other older ones (DiMaggio & Powell, 1983).

The third type of isomorphic pressure is the normative isomorphic pressure, which stems primarily from professionalization (DiMaggio & Powell, 1983). DiMaggio and Powell (1983) understand professionalization as: "*the collective struggle of members of an occupation to define the conditions and methods of their work, to control "the production of producers" and to establish a cognitive base and legitimation for their occupational autonomy*" (DiMaggio & Powell, 1983, p. 152). These professionals are rarely completely successful in achieving their objectives as they often have to compromise with regulators, bosses or nonprofessional clients (DiMaggio & Powell, 1983). The professionals are experiencing the same mimetic and coercive forces as organisations (DiMaggio & Powell, 1983). Particularly two sides of professionalization are the main drivers for isomorphism according to Powell and DiMaggio (1983) and these are: "*formal education and of legitimation in a cognitive base produced by university specialists*" (DiMaggio & Powell, 1983, p. 152) and *"the growth and elaboration of professional networks that span organizations and across which new models diffuse rapidly"* (DiMaggio & Powell, 1983, p. 152). These two sources of professionalization create a group of interchangeable people occupying similar positions across organisations (DiMaggio & Powell, 1983). Moreover, as their disposition and orientation are similar these could override the different traditions and controls that otherwise would have shaped organisational behaviour (DiMaggio & Powell, 1983).

DiMaggio and Powell (1983) have in their paper put forward hypotheses that predict isomorphic change within fields and at the organisational level. These are summarised in the Table 20 in Appendix B.

3.2. Criticism of the paper by DiMaggio and Powell

The focus on convergence as a result from isomorphism in the paper by DiMaggio and Powell is a one-sided view of institutional development in the new sociological institutionalism according to Beckert (2010) who argues that the different types of pressure for isomorphism can also cause divergence (Beckert, 2010). In using the theoretical concept of isomorphism by DiMaggio and Powell for the analysis in this thesis divergent patterns of reporting are not detected and analysed, as due to the research question it is more appropriate to focus on the convergence of CSR reporting of banks than the divergence. Nevertheless, these divergent practices could also yield interesting findings, but are beyond the scope of the thesis.

Another perspective on isomorphism described by Riaz (2009) concerns the view of “reversed legitimacy”, that is institutions gaining legitimacy from being associated to successful organisations (Riaz, 2009). Riaz (2009) argues that the influence of legitimacy flows both ways, as the homogeneity of organisations or field also legitimates the institutions, which are responsible for the isomorphic processes (Riaz, 2009). If an organisation is successful as a whole, then the institution from which it sought legitimacy is considered to be responsible in helping that organisation to succeed (Riaz, 2009). This provides that institution with what Riaz (2009) describes as the “*halo of success*” (Riaz, 2009, p. 29). One example of an institution receiving a “*halo of success*” is when a public policy decision is made to copy that institution (Riaz, 2009). The potential impact of reversed legitimacy is not considered in this thesis’ discussion of banks’ CSR reporting patterns, as only the pressures stemming from institutions are analysed due to the nature of the research question. Nevertheless, there is a chance that the impact of pressures stemming from different institutions is overestimated in the analysis, as the effect of institutions seeking legitimacy from the organisations is not considered.

4. Global Reporting Initiative's G4 Guidelines

In this chapter, the GRI's G4 guidelines are outlined and discussed in order to provide a basic understanding of the framework upon which the reports in the analysis are based. First, GRI organisation is shortly presented. Second, a description of the G4 Guidelines is provided. Third, the Financial Services Sector Disclosures (FSSD) are outlined. Fourth, is a criticism of the GRI and its G4 Guidelines and finally, a conclusion to the chapter.

4.1. The Global Reporting Initiative

In 1997 the CERES organisation and the Tellus Institute together with the UN set up a project with the purpose to develop an accountability mechanism that would encourage responsible environmental behaviour in companies, and this later turned into the Global Reporting Initiative (GRI) organisation (Global Reporting Initiative, n.d.-b). The vision of GRI is: "*to create a future where sustainability is integral to every organization's decision-making process*" (Global Reporting Initiative, n.d.-a). GRI seeks to achieve its vision by empowering decision makers to take the necessary actions to ensure a more sustainable world, and it does so through its sustainability standard (Global Reporting Initiative, n.d.-a). GRI emphasises a multiple stakeholder approach in the development of its guidelines, and participating organisations are selected from the business world, academia, labour organisations, public agencies, intergovernmental agencies and civil society (Global Reporting Initiative, n.d.-b).

4.2. GRI 4 Guidelines

The following sections provide an outline of the GRI 4 Guidelines, as it is important to understand the foundation upon which the reports were created. First, the Reporting Principles are examined with the underlining principles described separately. These underlining principles are the Reporting Principles for Defining Content and the Reporting Principles for Defining Quality. Second, the Standard Disclosures are examined and these principles consist of the General Standard Disclosures and the Specific Standard Disclosure, which are also examined separately.

4.2.1. Principles for Defining Report Content

These principles need to be applied in the report preparing process in order for organisations to identify the content of the report by considering their business activities and the impacts resulting from these activities along with the interests of different stakeholders (Global Reporting Initiative, 2015a). The Principles for Defining Report Content include the four following principles: Stakeholder Inclusiveness, Sustainability Context, Materiality and Completeness. Each of them is summarised below.

Stakeholder Inclusiveness: It follows from this principle that: *"The organization should identify its stakeholders, and explain how it has responded to their reasonable expectation and interest"* (Global Reporting Initiative, 2015a, p. 16). Stakeholders are not just those who have invested in the organisation but also other stakeholders whom the organisation is connected to (Global Reporting Initiative, 2015a). Here the key reference point is the reasonable expectations and interest of stakeholders in the decision making regarding the report preparation (Global Reporting Initiative, 2015a).

Sustainability Context: The principle states that: **"***The report should present the organization's performance in the wider context of sustainability"* (Global Reporting Initiative, 2015a, p. 17). In following the Sustainability Context principle organisations put their performance in the appropriate context, which could be a sector, regional or global sustainability context (Global Reporting Initiative, 2015a). This is necessary to properly answer the fundamental question of how the company is and will contribute to the future in terms of sustainability (Global Reporting Initiative, 2015a).

Materiality: This principle states that a report needs to include aspects that either reflect the significant impacts of organisation in terms of social, environmental and economic aspects or aspects that influence stakeholders' assessments and decisions (Global Reporting Initiative, 2015a).

Completeness: According to this principle *"The report should include coverage of material Aspects and their Boundaries, sufficient to reflect significant economic, environmental and social impacts, and to enable stakeholders to assess the organization's performance in the reporting period"* (Global Reporting Initiative, 2015a, p. 17). Completeness is when information is presented in a reasonable and appropriate manner and encompasses the measurements of scope, boundary and time (Global Reporting Initiative, 2015a).

4.2.2. Principles for Defining Report Quality

Quality of information is the goal for complying with the following principles when creating a CSR report. In order for stakeholders to conduct a proper assessment of an organisation's performance the quality of information is of great importance, and following these principles is fundamental to transparency (Global Reporting Initiative, 2015a). There are six Principles for Defining Report Quality and these are: Balance, Comparability, Accuracy, Timeliness, Clarity and Reliability. They are outlined in that order below.

Balance: The Balance principle states that: *"The report should reflect positive and negative aspects of the organization's performance to enable a reasoned assessment of overall performance"* (Global Reporting Initiative, 2015a, p. 17). The presentation of the report's content should be free of any bias and avoid leaving out, selecting or presenting formats that can be considered as important to make a reasonable assessment of the performance of the organisation and thereby influence the decisions of stakeholders (Global Reporting Initiative, 2015a).

Comparability: This principle states that: "*The organization should select, compile and report information consistently. The reported information should be presented in a manner that enables stakeholders to analyze changes in the organization's performance over time, and that could support analysis relative to other organizations"* (Global Reporting Initiative, 2015a, p. 18). Stakeholders to the organisation need to able to compare the performance of the organisation to either past performance, its sustainability objectives and possibly to other organisations (Global Reporting Initiative, 2015a).

Accuracy: The Accuracy principle states that: *"The reported information should be sufficiently accurate and detailed for stakeholders to assess the organization's performance"* (Global Reporting Initiative, 2015a, p. 18). The characteristics determining accuracy will differ depending on the report user and the nature of the information (Global Reporting Initiative, 2015b).

Timeliness: This principle states that: *"The organization should report on a regular schedule so that information is available in time for stakeholders to make informed decisions"* (Global Reporting Initiative, 2015a, p. 18). In order for stakeholders to effectively integrate information into their decision-making, timing of its disclosure is vital to the usefulness of the information and refers both to the proximity of events and the regularity of release (Global Reporting Initiative, 2015a).

Clarity: It is stated in this principle that: *"The organization should make information available in a manner that is understandable and accessible to stakeholders using the report"*

(Global Reporting Initiative, 2015a, p. 18). In order for stakeholders to make a reasonable assessment of the performance of the company, the information has to be presented in a clear manner that will not confuse them (Global Reporting Initiative, 2015a).

Reliability: The principle states that: *"The organization should gather, record, compile, analyze and disclose information and processes used in the preparation of a report in a way that they can be subject to examination and that establishes the quality and materiality of the information"* (Global Reporting Initiative, 2015a, p. 18). A report needs to be reliable in the sense that the information has to be legitimate and accurate so that stakeholders will have confidence in the reported content (Global Reporting Initiative, 2015a).

4.2.3. General Standard Disclosures

All organisations preparing their report using the G4 Guidelines have to include the General Standard Disclosures (Global Reporting Initiative, 2015a). Reporting organisations have to identify the General Standard Disclosures to be reported depending on their chosen Accordance Level (Global Reporting Initiative, 2015a). These disclosures consists of the following seven parts: Strategy and Analysis, Organizational Profile, Identified Material Aspects and Boundaries, Stakeholder Engagement, Report Profile, Governance, and Ethics and Integrity (Global Reporting Initiative, 2015a). Each part is summarised in that order below.

Strategy and Analysis: The disclosures within the strategy and analysis area are designed to give the report user a general strategic overview over the organisation and provide strategic insights into the organisation (Global Reporting Initiative, 2015a). The organisation needs to provide a statement from a senior executive in the organisation, which addresses how the organisation positions itself strategically in terms of sustainability along with an overall vision and strategy that states how the organisation manages the significant economic, environmental, and societal impacts of its activities (Global Reporting Initiative, 2015a). Furthermore, the organisation has to describe its impacts on sustainability and its key effects on its stakeholders along with the impacts of sustainability trends on risks and opportunities to the financial performance of the organisation in the long run (Global Reporting Initiative, 2015a).

Organisational Profile: In this section, the disclosures concern the characteristics of the organisation. This includes characteristics such as an organisation's brands, products and services, where these are sold and manufactured along with a description of the organisation's supply chain

(Global Reporting Initiative, 2015a). Moreover, the scale of the organisation has to be reported as well as the composition of the employees in terms of gender, diversity or contract and whether they are covered by collective bargaining (Global Reporting Initiative, 2015a). In addition, ties to industry associations or support of any international or national advocacy organisation should also be disclosed in this section (Global Reporting Initiative, 2015a).

Identified Material Aspects and Boundaries: The disclosures in this section require an organisation to disclose information about how its material aspects are determined along with the organisational boundaries and whether the material aspects are considered within, partially within, or outside these boundaries (Global Reporting Initiative, 2015b). In disclosing information on the organisational boundaries, a list of the organisation's entities that details which entities are included and which are excluded in the GRI report has to be included in the report (Global Reporting Initiative, 2015b). Moreover, the organisation has to report how the process of determining material aspects relates to the GRI reporting principles and to provide a list of relevant stakeholders outside the organisation who are affected by the particular aspect (Global Reporting Initiative, 2015a).

Stakeholder Engagement: These disclosures require organisations to list their stakeholders and describe the process of identifying and selecting them (Global Reporting Initiative, 2015a). Moreover, the organisation needs to report how it approaches its engagement with its stakeholders in terms of frequency, topics or situations discussed or if stakeholders are consulted during the preparation of the report (Global Reporting Initiative, 2015a).

Report Profile: The disclosures in this section contain information about the basic information and structure of the report such as reporting cycle, whether the reporting period follow the calendar year or fiscal year etc. (Global Reporting Initiative, 2015a). It also includes the disclosures related to the chosen Accordance Level of an organisation and a list of the reported content depending on whether the organisation chooses the Core or Comprehensive Accordance Level. Moreover, the section also includes disclosures regarding the use of external assurance as well as the policies, scope and basis for that (Global Reporting Initiative, 2015a).

Governance: Disclosure of the governance structure and composition of an organisation is needed in order to ensure accountability of the report (Global Reporting Initiative, 2015a). In disclosing the composition of the highest governance body, various characteristics such as gender or diversity and how new members are nominated should be reported (Global Reporting Initiative, 2015a). Furthermore, the performance evaluation of the highest governing body's members needs to be reported in terms of their ability to the govern economic, environmental and social issues of the organisation (Global Reporting Initiative, 2015a). Also, the organisation needs to disclose how the highest governing body identifies and manages risks, opportunities, economic, environmental and social issues (Global Reporting Initiative, 2015a).

Ethics and Integrity: This group of disclosures provides an overview of the values, principles and norms of the organisation, how it uses different measures to detect unlawful and unethical behaviour, and how it provides guidance to its employees when they suspect that such behaviour is taking place (Global Reporting Initiative, 2015a).

4.2.4. Disclosure on Management Approach and Specific Standard Disclosures

The Disclosure on Management Approach (DMA) contains information about the approach by the management on managing the economic, environmental and social impacts related to material aspects (Global Reporting Initiative, 2015b). The DMAs provide the organisation with an opportunity to address its material aspects, clarify how these are managed and provide context to the Specific Standard Disclosures (Global Reporting Initiative, 2015a). Moreover, the evaluation of the management approach should be reported in regards to its effectiveness, results and any adjustment made to it (Global Reporting Initiative, 2015a).

The Specific Standard Disclosures are also known as the Indicators and are divided into the three categories: the economic, environmental and social indicators. All three categories are summarised below. Further, each category is summarised in relation to its aspects in order to sum up how organisations are evaluated in each category.

Economic Indicators: The economic indicators measure four different aspects of an organisation’s performance. The first aspect is the economic performance, which is the direct economic value accumulated and its redistribution into society (Global Reporting Initiative, 2015a). The second aspect is market presence, which is measured using indicators such as entry-level salary to local minimum wage (Global Reporting Initiative, 2015a). The third aspect is the indirect economic impact of an organisation, which is measured as for example investment into infrastructure or its impacts on local communities (Global Reporting Initiative, 2015a). The fourth aspect concerns the effects on the procurement practices of the organisation on the local economy and is measured as the degree to which an organisation source locally (Global Reporting Initiative, 2015a).

Environmental Indicators: In the environmental category, indicators are measured against the effects of the organisation on the: *"Living and non-living natural systems"* (Global Reporting Initiative, 2015a, p. 52). Different aspects measure the environmental performance of an organisation, for example energy consumption, the reduction of energy usage or direct and indirect greenhouse gas (GHG) emissions amongst others (Global Reporting Initiative, 2015a). Furthermore, an organisation is required to disclose the environmental effects from transportation of materials, people and products, how many suppliers are screened using environmental criteria and the number of sanctions for non-compliance with environmental laws (Global Reporting Initiative, 2015a).

Social Indicators: The social category contains a number of different aspects and is therefore divided into four sub-categories: Labour Practices and Decent Work, Human Rights, Society, and Product Responsibility (Global Reporting Initiative, 2015a).

The Labour Practices and Decent Work sub-category includes aspects measuring the composition of the labour force in terms of gender, diversity, the benefits provided to employees or the difference in basic salary between female and male employees amongst other measurements (Global Reporting Initiative, 2015a).

The Human Rights sub-category requires the organisation to report any human rights violations, its processes to uphold human rights, if investment agreements include a human rights clause in the contract and any changes to its stakeholders' ability to exercise and enjoy their human rights (Global Reporting Initiative, 2015a). The human rights issues covered by the G4 Guidelines are non-discrimination, gender equality, freedom of association, collective bargaining, child labour, forced or compulsory labour and indigenous rights (Global Reporting Initiative, 2015a).

The Society sub-category includes indicators that measure an organisation's involvement and impacts on the local communities where it operates such as the occurrence and management of corruption, contribution made to a political party, any sanction of non-compliance with laws and regulation, anti-competitive behaviour and monopoly practices (Global Reporting Initiative, 2015a).

For all the three categories above, an organisation has to disclose how many suppliers are screened using social criteria (Global Reporting Initiative, 2015a).

The Product Responsibility sub-category requires an organisation to report, amongst other things, on the labelling of products and services, any issues within its marketing communication such as the sale of banned or disputed products, breach of customer privacy or loss of data and any sanctions due to non-compliance with regulation related to the provision and use of products and services (Global Reporting Initiative, 2015a).

4.3. GRI 4 Financial Sector Disclosures

The FSSDs are an additional set of disclosures for organisations in the financial services sector and present the organisations with the opportunity to provide in their reports more information that are especially relevant to their businesses (Global Reporting Initiative, 2013). The disclosures target organisations that operate within four types of businesses: retail banking, commercial and corporate banking, asset management, and insurance (Global Reporting Initiative, 2013). Below some of the disclosures are summarised according to the economic, environmental and social categories, in order to illustrate what type of information is required or recommended by GRI to add in reports for organisations in the financial sector (Global Reporting Initiative, 2013).

Economic: In this category there is additional information required in the reporting of an organisation's community investment by reporting on their community investment strategy and how investment activities are received and evaluated (Global Reporting Initiative, 2013).

Environmental: Sector specific information in this category is mainly focused on the business travel of organisations, energy usage and their direct and indirect GHG emissions (Global Reporting Initiative, 2013). Moreover, the FSSDs suggests the inclusion of organisations' estimations of the direct and indirect GHG emissions from their financing portfolio in the report (Global Reporting Initiative, 2013). However, the disclosure of this information is not a requirement for achieving any of the accordance levels (Global Reporting Initiative, 2013).

Social: Within this category organisations should report on indicators measuring the accessibility of their products and services in sparsely populated or economically disadvantaged areas as well as any initiative to improve access to their products and services or to enhance financial literacy of its beneficiaries (Global Reporting Initiative, 2013). Moreover, this category also contains specific aspects in the Product Responsibility sub-category, these being Product Portfolio, Audit and Active Ownership (Global Reporting Initiative, 2013). These aspects include indicators or DMAs that disclose information on policies with an environmental and social component to them, the consideration of environmental and social risks to business lines, any investment in companies that the organisation has interacted with on environmental or social issues and the percentage of assets screened using positive or negative screening of environmental or social impacts (Global Reporting Initiative, 2013).

4.4. Critique of GRI

GRI has been the subject to criticism for its reporting framework, and this section discusses three of the areas in which the framework of GRI has received criticism.

The first area of critique centres on the fact that the framework is based on the Triple Bottom Line (TBL) accounting framework. The TBL framework is divided into three bottom lines; the bottom line of corporate profit, the company's people account or social responsibilities bottom line and the environmental bottom line (The Economist, 2009). However, critics observe that the approach simplifies the nature of sustainable development, and thereby it risks leaving out material information (Moneva, Archel, & Correa, 2006). Moreover, Zadek (2001) adds that: "*Social, environmental and economic gains and losses arising from a particular business process cannot simply be added up*" (Zadek (2001) in Adams, Frost, & Webber, 2004, p. 18). In addition, as the TBL framework is not final, the manner GRI attempts to improve it does not decrease the simplification of SD (Moneva et al., 2006). This is because GRI does this through the consensus making of how to best measure the SD performance of organisations (Moneva et al., 2006). This is further complicated by the fact that the success of GRI is dependent on the number of reporting entities that adhere to their guidelines, leaving GRI open to pressure from companies in this consensus making process (Moneva et al., 2006). Also, GRI makes no attempt at including integrated indicators, as the TBL approach advocates (Moneva et al., 2006). This was also the case with the G4 Guidelines used for the analysis, as indicators are still separated into the three dimensions.

A second issue with the GRI G4 Guidelines is the lack of guidance regarding how to include sustainability context (McElroy, 2013). CSR reports need to include the context for the information to be meaningful, which means that social impacts should be reported relative to human needs and environmental impacts to ecological thresholds (McElroy, 2013). If context is absent then the disclosure of sustainability performance is not true, authentic nor empirical (McElroy, 2013). The GRI does point to the importance of sustainability context in the G4 Guidelines, but does so in a way that makes the inclusion of it discretionary (McElroy, 2013). As a result, reports that comply to GRI are more or less context free, and this includes companies that previously received A+ ratings (McElroy, 2013). Without the context the indicators could potentially hide or misrepresent the sustainability performance of companies (McElroy, 2013).

A third issue with the GRI G4 Guidelines is the new Accordance Level options; the Core or Comprehensive options. If a company does not want to report on certain indicators this is a loophole for them not to report on these (PROBono Australia, 2013). It is a loophole because a company only has to report on one indicator in order to comply with the Core option (PROBono Australia, 2013). As a result a company can achieve compliance with the G4 Guidelines when reporting on only a few indicators (PROBono Australia, 2013).

4.5. Conclusion to Chapter

Organisations have to consider four principles when defining the content of their reports. These are: Stakeholder Inclusiveness, Sustainability Context, Materiality, and Completeness. When defining the quality of reports organisations need to include six principles, which are: Balance, Comparability, Accuracy, Timeliness, Clarity and Reliability.

The General Standard Disclosures consist of seven parts: Strategy and Analysis, Organisational Profile, Identified Material Aspects and Boundaries, Stakeholder Engagement, Report Profile, Governance, and Ethics and Integrity. The disclosures related to these seven parts need to be considered and included by organisations to an extent deriving from the chosen Accordance Level.

The Specific Standard Disclosures or Indicators require organisations to report information in three different categories: Economic, Environmental and Social. Moreover, an organisation has the opportunity to disclose more information in the DMAs. This is also the case of the FSSD Indicators, which, furthermore, provide organisations in the Financial Services sector with an opportunity to disclose information specifically relevant to this sector.

GRI has been criticised for their use of the TBL framework in their guidelines, as it oversimplifies the nature of sustainable development and thereby risks leaving out important information. Moreover, the dependency of GRI on the number of reporting entities using its guidelines increases the sensitivity of GRI to business pressure in the consensus making of how to measure SD in organisations. In addition, the GRI guidelines lack guidance on the incorporation of sustainability context and indicators integrating the economic, environmental and social dimensions. Finally, the new accordance options represent a loophole for companies that do not want to report on certain indicators.

5. Comparability

This chapter explores the concept of comparability in order to provide the reader with an understanding of the concept and how it relates to CSR reporting. This is necessary to understand in order to be able to determine whether the reported content is comparable or not. The definition used to determine whether comparability is enabled in the reports of banks is developed from the definitions provided from GRI, the International Integrated Reporting Council (IIRC), the Sustainability Accounting Standards Board (SASB) and the European Union. Further, the chapter includes a description of how comparability is considered in practice by illustrating how companies are selected for the Dow Jones Sustainability Index series.

5.1. Global Reporting Initiative

GRI explains comparability as a principle that defines report quality and that should be included in the preparation of the report in order to achieve transparency (Global Reporting Initiative, 2015b). The quality of the report is essential for stakeholders to be able to evaluate the performance of organisations and to take the appropriate steps accordingly (Global Reporting Initiative, 2015b). In adhering to the comparability principle GRI states that: "*The organization should select, compile and report information consistently. The reported information should be presented in a manner that enables stakeholders to analyse changes in the organization's performance over time, and that could support analysis relative to other organizations*" (Global Reporting Initiative, 2015a, p. 18).

GRI explains that making comparisons between the organisation's current performance and past performance or objectives of the organisation should be available for stakeholders, as the reporting process should be consistent over time (Global Reporting Initiative, 2015b). The emphasis is on the comparison of performance "within the organisation", that is comparison with past performance and the objectives of the organisation (Global Reporting Initiative, 2015b). The keyword is consistency because if an organisation consistently reports in the same manner this enables stakeholders to benchmark performance and assess progress (Global Reporting Initiative, 2015b), but only within the organisation. The consistency is facilitated by the principle of

Materiality, and if organisations adhere to this principle in their reporting processes, then reports should be consistent over time (Global Reporting Initiative, 2015b).

When it comes to the assessment and comparison of an organisation's performance to that of another organisation, GRI states that stakeholders should be able to perform these comparisons to *"the degree possible"* (Global Reporting Initiative, 2015a, p. 18). What is understood by to the degree possible is not defined in the guidelines, but GRI argues that when comparing one organisation relatively to another, certain differences have to be considered and context have to be provided explaining factors that could influence any difference in performances (Global Reporting Initiative, 2015b).

5.2. The International Integrated Reporting Council

IIRC was founded with the mission "*to establish integrated reporting and thinking within mainstream business practice as the norm in the public and private sector"* (International Integrated Reporting Council, 2013, p. 2). To achieve this mission IIRC wants corporate behaviour and capital allocation to be aligned with both financial and sustainability goals through the use of integrated reporting and thinking (International Integrated Reporting Council, 2013).

The IIRC framework considers comparability as one of the guiding principles and states that an integrated report should present information in a manner that it is consistent over time and enables comparisons of an organisation's performance to other organisations (International Integrated Reporting Council, 2013). However, this only applies if it is material to the ability of the organisation to create value over time (International Integrated Reporting Council, 2013).

According to IIRC, despite the varying information of organisations there is a sufficient level of comparability between organisations if questions relating to the framework's Content Elements are addressed, as these are applicable to all organisations (International Integrated Reporting Council, 2013). IIRC provides different suggestions on how to enable comparability between organisations, such as the use of industry or regional benchmark data or using ratios as way of presenting data (International Integrated Reporting Council, 2013).

In its definition of comparability IIRC stresses consistency in the information over time, which is achieved by having the same reporting policies. Furthermore, IIRC emphasises the comparisons between organisations instead of other comparisons such as between current and past performance. Comparisons are enabled through the use of benchmarking data or ratios. This differs from the definition made by GRI, where comparability between organisations only should be done to "*the degree possible*" as quoted above.

5.3. The Sustainability Accounting Standards Board

SASB is a provider of sustainability accounting standards for organisations in the United States and its framework is designed to fulfil the disclosure requirements for mandatory filing to the Securities and Exchange Commission (Sustainability Accounting Standards Board, 2014). SASB has developed seven reporting frameworks depending on the business of an organisation within the Financial Sector and these are: Asset Management and Custody Activities, Commercial Banks, Consumer Finance, Insurance, Investment Banking and Brokerage, Mortgage Finance, and Security and Commodity Exchange.

SASB defines comparability as a criterion to accounting metrics used in the report for all industries (Sustainability Accounting Standards Board, 2017). The metrics should enable peer-to-peer benchmark within a certain industry and a year-to-year benchmark of the organisation's performance (Sustainability Accounting Standards Board, 2017). These metrics would primarily be made up by quantitative data, but also qualitative data that enables comparisons to fulfil the comparable criteria (Sustainability Accounting Standards Board, 2017). SASB defines comparability as a quality of the metric used, which enables benchmarking of the organisations' current performance to past performance or to other organisations. Therefore, comparability is present when these types of benchmarking can be performed.

5.4. European Union

On the 6th of December 2014, Directive 2014/95/EU came into force. It dictates that certain large groups and undertakings now have to disclose non-financial and diversity information beginning in 2018 for the 2017 financial year (European Commission, 2017). The European Commission released a set of guidelines to assist companies with the reporting of "*high quality, relevant, useful, consistent and more comparable non-financial information*" (European Commission, 2017, p. 4). The guidelines provide guidance that enables organisations to report information consistently and coherently and also assist in ensuring cross-company and cross-sector comparability (European Commission, 2017).

According to the guidelines from the European Commission, reported information should be consistent over reporting periods to enable stakeholders to compare present and past performance (European Commission, 2017). Moreover, comparability between organisations within the same industry may be appropriate as they are likely to share similar challenges within environmental, social and governance issues (European Commission, 2017). The guidelines recommend organisations to disclose benchmarks, targets and commitments in their CSR reports, as these provide context to the performance for investors (European Commission, 2017).

The concept of comparability, as defined by the guidelines from the European Commission, is similar to that of GRI in that it emphasises consistency in content over time to enable analysis of present and past performance of an organisation. However, the European Commission also judges that comparability between organisations should be possible within the same industry, as they face the same environmental, social and governance challenges. In addition, as with the SASB and IIRC, the European Commission emphasises the use of benchmarking, targets and key performance indicators to enable cross-company comparisons.

5.5. Comparability in the Analysis

From the definitions above it is evident that comparability is a characteristic that defines the quality of the information in the report. In order to obtain comparability consistency is needed in reporting policies by presenting the information in a manner that facilitates comparative analysis, not just between past and present performance but also relative peer-to-peer. Moreover, comparative peer-to-peer analysis is enabled to the extent that it is performed between companies within the same industry. Therefore, comparability is defined as being achieved when there is consistency in three areas. First, there has to be consistency in the manner in which the report is produced and how its data is collected. Second, the content of the report, in particular the choice of indicators, has to be consistent in order to enable comparability. Third, consistency in the presentation of information is also necessary to facilitate comparison of that information. Consistency should be present in all these three areas in not just one company's report, but also across companies in the same industry over time. This would enable the comparability of information across the CSR reports of companies.

5.6. Comparability in Sustainability Indices

Over time investors' interest in the CSR performance of companies has increased, as it is associated with their ability to generate long-term value (RobecoSAM, 2017). Therefore, the number of indices with a focus on including companies with a high CSR performance has increased. This section describes the methodologies used by RobecoSAM in the selection of companies for the Dow Jones Sustainability Index Series.

5.6.1. Dow Jones Sustainability Index World

In 1999 the Dow Jones Sustainability Index World was introduced. The index contains 10 per cent of the largest companies represented in the S&P Global BMI. These 10 per cent are sustainability leaders appointed by RobecoSAM, who use their annual Corporate Sustainability Assessment (CSA) to identify candidates. The following sections summarise the methodology of the CSA in order to understand how companies are selected to the pool of candidates for the DJSI.

The CSA is an annual analysis of more than 3,400 invited companies to join the pool of DJSI candidates where a questionnaire is distributed to the companies and they are asked to provide supporting evidence for their answers (RobecoSAM, 2017). Besides the supporting evidence provided by the companies, RobecoSAM also crosschecks answers with publicly available data and reports from the media and stakeholders (RobecoSAM, 2017). The focus on financial material sustainability performance ensures that the assessment is particularly relevant for investors while at the same time enabling companies to focus on sustainability issues that are material to their business success (RobecoSAM, 2017).

In terms of defining the sustainability information that is material to financial performance, RobecoSAM uses its quantitative research alongside the experience of its sustainability analysts to determine what factors correlate with the financial performance of companies in 60 different industries (RobecoSAM, 2017). These factors are individually analysed and subsequently ranked in relation to their magnitude and likelihood of impact on financial performance and the drivers that create business value over time (RobecoSAM, 2017).

The assessment identifies the companies most likely to outperform due to their sustainability policies (RobecoSAM, 2017). There are three dimensions in the assessment: the economic, the environmental and the social, and these dimensions include criteria that can be either general or industry-specific (RobecoSAM, 2017). Each of the criteria contain questions that all have weights assigned to them and are awarded up to 100 points with the total weight of the criteria within one dimension summing up to the weight of that dimension (RobecoSAM, 2017). Figure 4 in Appendix C illustrates the general structure of the assessment.

In each of the criteria RobecoSAM evaluates the awareness of companies of their sustainability issues and if they have appropriate strategies in place to manage them as well as the quality of the companies' reports on these issues (RobecoSAM, 2017). RobecoSAM is a strong advocate for an industry focus as industry specific opportunities or risks within the sustainability area are important for the long-term success of organisations (RobecoSAM, 2017). Moreover, RobecoSAM states that the industry focus allows them to compare companies against industry peers and, therefore, the criteria and weights assigned to each questions is different depending on the industry (RobecoSAM, 2017).

In scoring a question, first RobecoSAM intentionally designs its questionnaire to mainly include multiple-choice answers that have a designated weight assigned to then better ensure objectivity (RobecoSAM, 2017). Moreover, this objectivity is further enhanced by the limitation of qualitative answers, and if these are included, then analysts using a predefined appraisal method convert them into quantitative scores (RobecoSAM, 2017). An example of how a bank scores on a question is included in Figure 5 in Appendix D. After awarding points to a question, the question score is calculated. This calculation is illustrated in Figure 6 in Appendix E.

After scoring each question, the organisation's Total Sustainability Score (TSS) is calculated by summing up all individual questions' score (RobecoSAM, 2017). When the TSS has been calculated for all companies in an industry, companies are ranked against their peers in order to decide which ones can be selected for inclusion in the DJSI (RobecoSAM, 2017).

The CSA is based on information provided by companies in the questionnaire, but in order to assess potential risks not disclosed by companies RobecoSAM continuously observe the media, comments or other public information from stakeholders such as NGOs, governments, consumer organisations etc. (RobecoSAM, 2017). These potential risks are considered to be harmful to the core business of a company, especially to its reputation, and RobecoSAM calls this a Media and Stakeholder Analysis (MSA) (RobecoSAM, 2017). If there are stories fluctuating of a company's involvement in a negative event in the media or among other organisations, then a file or case is open on the company in question and these events can potentially impact their TSS (RobecoSAM, 2017).

A negative event can impact the company's TSS if it is responsible for causing a negative event that does not align with the policies or goals of the organisation or is a result of its management practices (RobecoSAM, 2017). In addition, it has be financially material to the company, which could be in terms of loss of reputation, customers etc. (RobecoSAM, 2017). This is called an impact evaluation and after this is performed the criteria that are affected by this event are identified (RobecoSAM, 2017). The company is thereafter contacted by RobecoSAM in order to provide further clarification of the matter whereupon the response is evaluated (RobecoSAM, 2017). Once this is done, RobecoSAM calculates an MSA score. This calculation is illustrated in Figure 7 in Appendix F. The score of the MSA calculation is deducted from the TSS and can therefore have an effect on the company's eligibility for inclusion in any of the DJSI (RobecoSAM, 2017).

5.7. Conclusion to Chapter

GRI, IIRC, SASB and the EU each have their own definition of comparability. Nevertheless, these definitions all define comparability as a characteristic to the content in the report or to the applied accounting metrics. Moreover, reports preparers need to be consistent in how they collect and select the data to report and in how they present this information. All four institutions state that comparability should be enabled when assessing the current and past behaviour of companies and to some extent when comparing one company to another within the same industry. IIRC, SASB and the EU emphasise the use of ratios, targets and benchmarking to enable comparability.

The definition of comparability that is used in the analysis of this thesis to determine whether the disclosed information of banks is comparable or not, is that there has to be consistency in the manner in which the report is produced or data is collected. Moreover, consistency is needed in selecting the content to report and in the presentation of that content. In addition, comparability of reported content is only possible between companies in the same industry.

The methodology of the CSA conducted annually by RobecoSAM demonstrates how the sustainability performance of companies is assessed and ranked in order to determine whether companies are included in the DJSI. RobecoSAM invites 3,400 companies to answer their questionnaire and provide supporting evidence, and RobecoSAM crosschecks their answers. Only sustainability information that is material to the financial performance of companies is considered in the assessment. The CSA contains general or industry-specific criteria, which each contains questions with assigned weights to them and that are scored individually. A TSS is then calculated, and if a company has been involved in a negative event contradicting its official sustainability policies then a MSA score is calculated and deducted from the TSS. The final TSS is then used to rank companies and determine who is eligible for inclusion into the DJSI.

6. The Sustainable Development Goals

The chapter provides a basic understanding of the SDGs and how they relate to the banking sector. First, a description of the SDGs is provided. Second, the relation between the SDGs and CSR reporting is explained by link between the SDGs and GRI. Third, the shortcomings of the SDGs are also examined. Fourth, the link between the financial service sector and the SDGs is examined through the use of recent sustainability cases involving banks alongside a general overview of the bank sector and its traditional CSR practices. This discussion will lead to the selection of the SDGs and indicators to be included in the analysis. Finally, the chapter ends with a conclusion.

6.1. Description of the Sustainable Development Goals

In September 2015, world leaders adopted the 17 SDGs at a UN summit and in January 2016 they came into force (United Nations, n.d.). The SDGs build on the experiences of the Millennium Developments Goals (MDGs) and they require the action of all member states, both poor, rich and middle-income states (United Nations, n.d.). Governments are expected to build national frameworks that support the achievement of the 17 goals and they have the responsibility to review and follow up on the implementation progress of the non-binding goals (United Nations, n.d.).

The SDGs support sustainable development (SD), which the UN defines as: "*development that meets the needs of the present without compromising the ability of future generations to meet their own needs*" (United Nations, n.d., sec. in the FAQ). Moreover, concerted efforts have to be directed for an inclusive, sustainable and resilient future for people and planet in order to facilitate SD (United Nations, n.d.). In order to achieve SD, three connected core elements have to be considered. These are economic growth, social inclusion and environmental protection, as these are crucial in the improvement of individuals and societies (United Nations, n.d.). The SDGs act as a compass for the policies of countries within these three areas of SD and will ensure the alignment of countries' sustainability efforts (United Nations, n.d.). Or put in another way, a common benchmark in which the effects of the human enterprise is assessed (Le Blanc, 2015). Moreover, the SDGs assist the facilitation of cooperation and accountability between nations in order to achieve a common vision (Le Blanc, 2015). The 17 SDGs are summarised in Figure 2 below.

Figure 2 – The Sustainable Development Goals

Source: United Nations

For each of the 17 SDGs there are targets and indicators in place to measure the progress made by countries (United Nations, n.d.). In total there are 169 targets, and the UN aims to have 2 indicators per target, though these are still work in progress by the UN Statisticians Office (United Nations, n.d.).

6.2. The Sustainable Development Goals and the Global Reporting Initiative

One of the targets for SDG 12 is the inclusion of the private sector in the achievement of the SDGs by their adoption of sustainable practices and in reporting sustainability information (Global Reporting Initiative, n.d.). The role and actions of the private sector are important in fostering SD (Global Reporting Initiative, n.d.). Here GRI acts an intermediary between business and governments, as they provide guidance to businesses on how to put international principles such as the SDGs into practice (Global Reporting Initiative, n.d.). Together with Business Call to Action, GRI published a report that examines how the measures undertaken by companies, such as impact measurement and CSR reports, contribute to the SDGs (Global Reporting Initiative, n.d.). Moreover, GRI also co-founded the global initiative the Measure What Matters project that seeks to enhance the alignment between the national, global and corporate sustainability data frameworks (Global Reporting Initiative, n.d.). In 2015, when the SDGs were introduced, the G4 Guidelines were the newest GRI guidelines on sustainability, and GRI published a document linking the SDGs and their business themes to the G4 Indicators. GRI together with the UN Global Compact and World Business Council for Sustainable Development also released the SDG compass, which is a guide on business action on the SDGs (Global Reporting Initiative et al., 2015b).

6.3. Shortcomings of the Sustainable Development Goals

The ambition of the SDGs to cover all that is considered good and desirable for the world produces the side effect of the goals being vague, weak and potentially meaningless (Holden, Linnerud, & Banister, 2016). Moreover, with the lack of prioritisation of goals into what Holden et al. (2016) categorises as primary and secondary goals the UN runs the risk of being satisfied with the achievement of secondary goals while primary goals are neglected (Holden et al., 2016). The prioritisation of goals is especially important when having multiple goals or targets as in the case of the SDGs because without it you might as well have no goals at all (Holden et al., 2016). Furthermore, some SDGs are the goals to be achieved while other SDGs act as the means to achieve the aforementioned (Holden et al., 2016).

A second issue with the SDGs is that they do not address the pressures that are responsible for the environmental and social issues (Spangenberg, 2016). As long as this is not addressed the SDGs will not have the desired outcomes (Spangenberg, 2016). The reason for this is the focus of the SDG targets as they emphasise the change of unsustainable nations and impacts instead of unsustainable trends (Spangenberg, 2016). Therefore, there is no need to change these pressures and, furthermore, according to Spangenberg (2016) the SDGs support counterproductive drivers of SD such as sustained GDP growth (Spangenberg, 2016). This presents a somewhat ironic situation, as the SDGs are spurring on drivers that caused these pressures and formed the situation, which they are supposed to change (Spangenberg, 2016). For instance, sustained GDP growth is not an option considering the constraints by the planetary boundaries (Spangenberg, 2016).

Business actors are assigned a major role in achieving the SDGs, as they are considered to be an agent with an important role in defining strategies and objectives for the 2030 Agenda

(Spangenberg, 2016). Nevertheless, despite their increased influence their responsibilities have not increased with it (Spangenberg, 2016). As the objectives and targets of the SDGs do not consider business actors to have either a positive or, in particular, a negative role in SD, they are expected to be, as Spangenberg (2016) describes it: "*a per se benevolent actor for public good, instead of a market based, profit seeking undertaking*" (Spangenberg, 2016, p. 6). The inclusion of business actors is complex due to the assumptions that they will adhere to the environmental, social and human rights standards in their operations (Jones, Hillier, & Comfort, 2016). Moreover, it is also complex because it assumes that business actors will reconfigure their business model in order to only produce sustainable products and to redirect resources to achieve the SDG targets despite this potentially being at the expense of their profits (Jones et al., 2016).

Spangenberg (2016) summarises the important demands of the SDGs on business actors in two points. The first point is that business actors can achieve a higher level of economic productivity through the means of diversification, technological upgrading and innovation in sectors that are high-value adding and labour-intensive (Spangenberg, 2016). Second, the SDGs demand business actors to retrofit their industries in order to make them sustainable by upgrading their technological capabilities, separating economic growth from environmental deprivation, improving the efficiency of global resources and encouraging them to embrace sustainable practices and to report on sustainability information (Spangenberg, 2016). When relying on business actors to voluntarily apply their creativity one neglects the mentioning of important drivers of SD, that is SD is either forced by consumer pressure or regulatory requirements (Spangenberg, 2016). The fact that the SDGs are not legally binding makes their implementation completely dependent on political commitment (Jones et al., 2016). Therefore, they are not a truly transformational agenda and could instead end up with costs exceeding that of the global development and aid budget (Jones et al., 2016).

6.4. The Sustainable Development Goals and the Banking Sector

The banking sector consists of commercial banks, savings banks, credit unions, mortgage bankers, loan brokers and trust companies (Encyclopedia of Global Industries, 2017). Banks are considered as financial intermediaries in society because they value and price financial assets, manage financial risks, monitor borrowers and are the organisers of a payment system (Scholtens, 2009). More specifically, there are two essential functions of banks. First, is the facilitation of payments, may it be either through checks, credit or debit cards, electronic transfers and other non-currency payments. Globalisation has made this function more important (Encyclopedia of Global Industries, 2017). Second, banks serve as efficient and secure financial depositories for their customers' liquid assets, where banks channel some of these deposited funds into other operations (Encyclopedia of Global Industries, 2017). One type of these other operations is the provision of credit to their customers, which include different types of loans and credit accounts, which traditionally has made banking lucrative (Encyclopedia of Global Industries, 2017). The provision of credit is lucrative because banks charge borrowers interest fees in excess of what they need to repay depositors and this is how they earn revenues (Encyclopedia of Global Industries, 2017). The activity of lending is important to national economies, as it enables the financing of agricultural, commercial and industrial activities (Encyclopedia of Global Industries, 2017). Banks play an important part in the economic development since part of their role is to be financial intermediaries (Scholtens, 2009). Moreover, the activities of banks affect a large number of people who use their services and these people are often committed to the same bank for years or decades (Lentner, Szegedi, & Tatay, 2015).

Concerning the CSR reporting practices of banks, the banks often focus on internal ecology, such as energy efficiency, in their CSR reporting despite it not being material to their business (Eccles & Serafeim, 2013). They should instead focus on their responsibilities in the areas of: lending, investment, asset management operations, and, in particular, the promotion of financial inclusion, systemic risk management, social and governance performance (Eccles & Serafeim, 2013; Lentner et al., 2015). An example of a recent issue related to governance performance is that of Danske Bank where they were involved in money laundering for the regime in Azerbaijan with an estimated value of up to 18 billion DKK (Olsen & Danielsen, 2017). After the discovery of the money laundering, it was also discovered that some of the money was used for bribery (Olsen & Danielsen, 2017).

One other important sustainability area of banks is the promotion of financial inclusion, which according to Klapper et al. (2016) means: "*that formal financial services—such as deposit and savings accounts, payment services, loans, and insurance—are readily available to consumers and that they are actively and effectively using these services to meet their specific needs*" (Klapper, El-Zoghbi, & Hess, 2016, p. 1). In providing financial services to people they are better enabled to climb out of poverty, as they can invest in a business or in education (Klapper et al., 2016).

Moreover, with access to financial services these people are better equipped to invest and to manage potential unexpected expenses (Klapper et al., 2016).

Access to financial services for business owners enables them to expand by investing in labour, inventory, etc. and it also provides them the opportunity to start new businesses (Klapper et al., 2016). Especially in enhancing innovation and sustainable industrialisation it is important that there is an easy access to credit or other financial services that facilitate investments (Klapper et al., 2016). With access to financial services people are more likely to be economically successful and are able to have a decent life, which ultimately improves the possibility of reducing inequalities (Klapper et al., 2016). Financial inclusion reduces inequality and the likelihood of social turmoil, by providing the foundation for equitable growth while improving the lives of the poor (Klapper et al., 2016).

The CSR activities of banks described above are within the social and economic areas of sustainability. Nevertheless, banks do also have a more indirect environmental impact from their business activities. The important environmental impacts of banks do not stem from internal activities, and are not mitigated by improving energy efficiency (Lentner et al., 2015). Their important environmental impacts stem from their investments in companies that are not producing safe products or that heavily pollute the environment (Lentner et al., 2015). It is from these indirect environmental impacts that banks now face pressures from public activism. One example of this is the case of the two Australian banks, Westpac and Commonwealth Bank, who were subjected to pressure by public activist groups to declare that they would not finance the new proposed Carmichael Coalmine in Queensland (Slezak, 2017). Another example is the Divest the Globe campaign led by Mazaska Talks (Money Talks). The Divest the Globe campaign was launched in 2017 in order to put pressure on banks to stop their financing of fossil fuels. The campaign resulted in the Equation Principles Associations deciding to revise their Equator Principle framework (Mazaska Talks (Money Talks), n.d.).

6.4.1. The Sustainable Development Goals selected for the Analysis

In selecting which SDGs to include in the analysis two criteria were applied. First, the information on sustainability in the banking sector mentioned above was considered in the selection. Second, the SDGs had to include indicators from the FSSD, which contains indicators especially relevant for the Financial Services sector. Therefore, SDGs 1, 9, 10, 11 and 13 were selected and Appendix H provides an overview over these SDGs and their indicators selected for the analysis. These five SDGs present opportunities for shared value to companies in the Financial Services sector. These opportunities for shared value are summarised for each SDG below.

SDG 1 presents the opportunity for banks to develop new financial products, operating models, credit scoring methodologies and distribution channel in order to advance financial inclusion for the 2.5 billion adults who are currently with a bank account (United Nations Global Compact & KPMG, 2015).

SDG 9 presents an opportunity for shared value for banks by encouraging them to increase their long-term finance for public-private partnerships within various infrastructure and to ensure these infrastructure investments are environmentally sensitive and fulfil the needs of users with low income or other marginalised groups (United Nations Global Compact & KPMG, 2015).

SDG 10 includes opportunities for shared value for banks, as banks are encouraged to advise their high net worth clients to invest in philanthropy that advances SD (United Nations Global Compact & KPMG, 2015). Moreover, banks should leverage and expand the use of new technologies such as mobile money payment services in order to build more efficient and effective distribution and operating models for new markets (United Nations Global Compact & KPMG, 2015).

SDG 11 provides opportunities for shared value in the collaboration with city stakeholders in analysing and increasing the resilience of transportation infrastructure and utilities amongst other, which supports the resilience of individual assets (United Nations Global Compact & KPMG, 2015).

SDG 13 offers opportunities for shared value in the investment or financing in climate risk mitigation, resilience and adaption by the use of products such as green bonds (United Nations Global Compact & KPMG, 2015). Moreover, climate risks should be integrated into the investment analysis and decision-making of banks (United Nations Global Compact & KPMG, 2015).

6.4.2. The Sustainable Development Goals in Corporate Social Responsibility Reports of Banks

When the SDGs were introduced in 2015, the banks in the analysis included them in their reports for 2015. The manner in which the SDGs were used and reported on in the 2015 reports differed from bank to bank. Four banks mentioned the SDGs in the opening statement of either their CEO or Chairman of the Board and they stated their support of the SDGs and their intentions to include them in future sustainability considerations (Credit Suisse, 2016b; European Investment Bank, 2016b; Grupo Cooperativo Cajamar, 2016; RZB Group, 2016b). Moreover, two of the banks stated how their current sustainability efforts contributed to the appropriate SDGs (Credit Suisse, 2016b; European Investment Bank, 2016b) and two others considered the SDGs in their approach to stakeholder inclusions (Grupo Cooperativo Cajamar, 2016; RZB Group, 2016b). One bank made a matrix mapping out each of the SDGs according to their relevance to the bank and to the external stakeholders of the bank (Grupo Cooperativo Cajamar, 2016). In addition, from this SDG matrix, the bank selected the five SDGs considered to be the priorities of the bank and listed all the material targets for each of those SDGs (Grupo Cooperativo Cajamar, 2016).

6.5. Conclusion to Chapter

The SDGs were introduced in September 2017 to build on the experiences of the MDGs. The SDGs are comprised of 17 goals with 169 targets where each target is predicted to have two indicators. GRI act as the intermediary between business and governments in implementing the SDGs, through their guidance on how to incorporate international principles, such as the SDG compass.

Banks are important in their role as financial intermediary and in their functions as facilitator of payments, provider of efficient and secure deposits and credit. As the lending activity of banks enables investment in agriculture, industrial and commercial activities these are important to national economies. The material CSR activities of banks are therefore mainly within the economic and social dimensions, as this is where banks have direct impacts through their business activities. This is especially the case in terms of financial inclusions, as access to financial services is crucial for reducing poverty. Nevertheless, banks do have important indirect environmental impacts and these have received attention from activist groups recently, as the case of the two Australian banks and the Divest the Globe campaign illustrates.

SDGs 1, 9, 10, 11 and 13 were elected for this thesis' analysis based on their relevance to current sustainability issues of banks and because they include FSSD indicators to measure the progress made. In achieving these five SDGs, there are several opportunities for shared value between governments, states and banks.

The use of the SDGs in the CSR reporting of banks varies from bank to bank. The majority mentioned the SDGs as a source of inspiration for guidance on future sustainability considerations and their intentions to work towards achieving the goals. Moreover, some banks reported how current sustainability efforts contributed to the SDGs, while others reported that the SDGs were considered in their efforts on stakeholder inclusion. One bank exerted more effort in reporting on the SDGs than the rest, as this bank created a SDG matrix mapping out the SDGs according to their relevance for the bank and their external stakeholders.

7. Analysis of Corporate Social Responsibility Reports

This chapter contains the analysis, which examined whether there was an effect on the inter-firm comparability of CSR reports following the introduction of the SDGs in 2015. Therefore, an analysis of comparability of the selected reports was performed on reports from 2014 to establish whether comparability was enabled. The results were compared with the results from the same type of analysis of reports from 2015 to determine an effect or lack thereof by the use SDGs in the reporting on comparability. The chapter starts by examining the accounting policies used by banks, how materiality was considered in regards to the selected indicators and the stakeholder inclusion efforts of banks. This is followed by an in-depth analysis of the selected indicators structured by the business themes and, finally, a conclusion to the chapter.

7.1. Accounting Policies

In order to determine whether or not the reported content by banks could be compared it was necessary to know the accounting policies used to produce the content. If the banks did not disclose the accounting policies they applied, then the foundation on which their reports were built is unknown and comparability is therefore not enabled. In the case of banks preparing reports using different accounting policies, the disclosure of these policies enables users to take this into account when performing comparative analyses. All the banks stated in their reports that content had been developed following the GRI G4 guidelines for both years and, furthermore, the reporting cycle for all the banks was annual and followed the calendar year (Bankia, 2015, 2016; Credit Suisse, 2015, 2016b; European Investment Bank, 2015b, 2016b; Grupo Cooperativo Cajamar, 2015, 2016; ING Group, 2015a, 2016b; RZB Group, 2015b, 2016b). The chosen accordance level in the reports were not the same for all the banks, as two had chosen the Core accordance option and the remaining four the Comprehensive accordance option in both reporting years (see Appendix A). Following the Reporting Principles in the G4 Guidelines is fundamental in order to achieve transparency and, especially the Principles for Defining Report Quality, as they guide choices on ensuring the quality of information (Global Reporting Initiative, 2015a). This quality is essential in enabling stakeholders to perform reasonable assessments of banks' performances and to take the appropriate actions (Global Reporting Initiative, 2015a).

Four out of six banks also used the sector specific guidelines for the financial sector when preparing the report content (Bankia, 2015, 2016; Credit Suisse, 2015, 2016b; European Investment Bank, 2015b, 2016b; Grupo Cooperativo Cajamar, 2015, 2016; ING Group, 2015a, 2016b; RZB Group, 2015b, 2016b). Moreover, two banks also used the AA1000 standards, and another bank the guidelines of the IIRC in both reporting years (Bankia, 2015, 2016; Credit Suisse, 2015, 2016b; European Investment Bank, 2015b, 2016b; Grupo Cooperativo Cajamar, 2015, 2016; ING Group, 2015a, 2016b; RZB Group, 2015b, 2016b). As all the banks state that they adhere to the G4 Guidelines this should enable comparability.

7.2. Material Aspects and Aspects Boundaries

This section examined whether the material aspects reported by banks related to the indicators that cover the reporting of SDG 1, 9, 10 and 11. Two banks reported material aspects down to an indicator level whereas the remaining four referred to their materiality matrices. All the indicators, except for one, included in the Financial Services Sector Disclosures were considered material for the two banks reporting at indicator level as summarised in Table 23 in Appendix I. However, it was different for the indicators not targeting the financial sector. Further, whether indicators were material was different for the two banks (see Appendix I).

In order to assess whether the chosen indicators were material to the four other banks their materiality matrices were examined. These banks reported in their materiality matrices that the following were considered material: sustainable products and services, commitment to society and the environment, organisational footprint, sustainable finance and investment policies, access to financial services, and financial literacy (Credit Suisse, 2015, 2016b; ING Group, 2015a, 2015b, 2016b; RZB Group, 2015a, 2015b, 2016a, 2016b). Moreover, some also included issues such as contribution to the economy and financial solutions to economic, environmental or social development (Credit Suisse, 2015, 2016b; Grupo Cooperativo Cajamar, 2015, 2016).

Overall, the four banks that did not report their material issues at indicator level still reported issues related to the chosen indicators as being material. The two banks reporting their material issues at an indicator level reported all sector specific indicators to be material, but for the standard

G4 indicators included in the analysis this differed for the two banks. Due to this it can be concluded that the majority of banks considered the indicators included in the analysis to be material.

In reporting aspect boundaries the banks first have to define their organisational boundaries. In order to assess their sustainability performance it is necessary to know whether they include the entire corporation with all subsidiaries in their reports. Four banks included this in their 2014 reports and this number increases to five in 2015 (Bankia, 2015, 2016; Credit Suisse, 2015, 2016b; European Investment Bank, 2015b, 2016b; Grupo Cooperativo Cajamar, 2015, 2016; ING Group, 2016b, 2015a, 2015b; RZB Group, 2015a, 2015b, 2016a, 2016b). Since not all banks defined their organisational boundaries, comparability is therefore not enabled in all the reports.

Once organisational boundaries are defined the banks have to list their material aspects as being either within or outside their organisational boundaries (Global Reporting Initiative, 2015b). In reporting whether aspects were considered within organisational boundaries for both reporting years, only two banks reported according to the full requirements, one reported partially and the remaining three did not disclose this information (Bankia, 2015, 2016; Credit Suisse, 2015, 2016b; European Investment Bank, 2015a, 2016a; Grupo Cooperativo Cajamar, 2015, 2016; ING Group, 2016b, 2015a, 2015b; RZB Group, 2015b, 2016b). In reporting whether aspects were considered outside the organisational boundaries for both reporting years, only two banks reported partially on this indicator and the other four did not disclose this information (Bankia, 2015, 2016; Credit Suisse, 2015, 2016b; European Investment Bank, 2015a, 2016a; Grupo Cooperativo Cajamar, 2015, 2016; ING Group, 2016b, 2015a, 2015b; RZB Group, 2015b, 2016b).

7.3. Stakeholder Inclusion

The banks in the analysis all reported their approach to stakeholder inclusion albeit some included more details than others. The majority identified their stakeholders on a more general level as they reported them as being customers, shareholders, suppliers, society, environment, rating agencies, NGOs, etc. (Bankia, 2015, 2016; Credit Suisse, 2015, 2016; European Investment Bank, 2015b, 2016b; Grupo Cooperativo Cajamar, 2015, 2016; RZB Group, 2015b, 2016b). Only one bank included the names of specific stakeholders and the issues they were working on with them

(ING Group, 2015a, 2015b, 2016b). Nevertheless, it is not required by the G4 Guidelines to report stakeholders in more detail (Global Reporting Initiative, 2015b).

The banks defined their stakeholders as those with a justified interest because they are affected directly or indirectly by daily business activities (Bankia, 2015; Credit Suisse, 2015, 2016b; Grupo Cooperativo Cajamar, 2015, 2016; RZB Group, 2015b, 2016a). Moreover, not all banks reported the frequency of communications with stakeholders and, those who did, reported that they communicate with them regularly (Bankia, 2015, 2016; Credit Suisse, 2015, 2016b; Grupo Cooperativo Cajamar, 2015, 2016; ING Group, 2015a, 2015b, 2016b; RZB Group, 2016b, 2015b). Only one bank reported whether their stakeholder engagement was part of the report preparing process (European Investment Bank, 2015b, 2016b). When organisations are in the processes of identifying, prioritising, validating and reviewing material aspects for reports they must include the principle of stakeholder inclusiveness to guide their decisions (Global Reporting Initiative, 2015b). Therefore, the inclusion of stakeholders could change the aspects considered material in reports, as stakeholders' view of the material aspects for an organisation might not be the same as those considered by the report preparers.

7.4. Analysis of Indicators by Business Themes

The following section presents an analysis of comparability in CSR reports. The analysis is structured by the business themes included in the selected SDGs. Business themes making use of the same indicators are analysed together in order to avoid repetition. The tables show the level of information for each indicator in the business theme. Table 22 in Appendix H provides an overview over the SDGs in the analysis, their business themes and their indicators.

7.4.1. Access to Financial Services and Access to Affordable Housing

The *Access to Financial Services* business theme is made up by five indicators and covers SDG 1, 9, and 10 (see Appendix H for overview). The second business theme *Access to Affordable Housing* only uses the FS7 indicator in its reporting and covers SDG 11 (see Appendix H for overview). In the following section Table 1 provides an overview over the level of information for these indicators for 2014.

Table 1 – Reporting Year 2014

Indicator	Complete	Partially	In G4 Content Index, not in the report	Not
FS6	0	1	5	0
FS7	0	3	2	1
FS13	0	2	0	4
FS14	0	2	2	2
Former FS16	0	2	0	4
Total	**0**	**10**	**9**	**11**

Not one bank reported the required information according to the G4 Guidelines (see Appendix J). Those who reported partially reported general information about their efforts within each indicator. For example, in the FS7 indicator the reporting banks did not include the monetary value of products offering a social benefit, but merely reported general information about these products (see Appendix L; Appendix N; Appendix P; Appendix T). Nevertheless, what is most remarkable is the lack of reporting by many of the banks in the indicators (see Appendix J). Due to the lack of reporting it is not possible to compare the information in any of the indicators.

Table 2 shows the level of information in the reporting of the banks in 2015, and the level has not increased.

Table 2 – Reporting Year 2015

Indicator	Complete	Partially	In G4 Content Index, not in the report	Not
FS6	0	0	5	1
FS7	0	4	1	1
FS13	0	1	0	5
FS14	0	1	2	3
Former FS16	0	2	1	3
Total	**0**	**8**	**9**	**13**

In reporting on these indicators none of the banks reported the complete information required (see Appendix K). Like in 2014, those who reported partially included general information (see Appendix M; Appendix O; Appendix Q; Appendix S; Appendix U). The lack of reporting is also remarkable in 2015 where banks disclosed less than in 2014 (see Appendix K). It is not possible to make comparisons of the information in 2015 either.

Overall, due to the lack of reporting by most of the banks comparability is not enabled in either reporting year. The information that is reported is general in nature without the required details and it is often reported differently. Therefore, the inclusion of the SDGs in these CSR reports seems to have had no effect on the selected indicators, as comparability is not enabled in 2015 either.

7.4.2. Access to Land

This business theme includes one indicator and covers SDG 1 (see Appendix H). Table 3 shows the level of information in reports from 2014.

Table 3 – Reporting Year 2014

Indicator	Complete	Partially	In G4 Content Index, not in the report	Not
G4-SO2	1	0	1	4
Total	**1**	**0**	**1**	**4**

The majority of banks did not report on this indicator (see Appendix J). One of them did report about their positive effects on society, but not the negative impacts, which is the required information (see Appendix P). The bank that reported according to the requirement only reported that there were no negative impacts to report about (see Appendix L). As none of the other banks reported on the indicator, it is not possible to compare the information in the reports.

For 2015, Table 4 below summarises the information level of reports. Here one bank reported partially on the indicator.

Table 4 – Reporting Year 2015

Indicator	Complete	Partially	In G4 Content Index, not in the report	Not
G4-SO2	1	1	0	4
Total	**1**	**1**	**0**	**4**

This bank did not directly report its own negative impacts, but reported on the negative effect on communities when there are no branch offices for customers to visit (see Appendix Q). Immediately after reporting this they reported that they do not close a branch office if there is no other in the area (see Appendix Q). The bank that made a complete report on the indicator reported the same information as in 2014 (see Appendix M). As the vast majority did not report on the indicators, comparability is not enabled for reports in 2015 either.

Overall, comparability in the CSR reports is not enabled in either 2014 or 2015, as the majority of banks did not report on the indicator. Therefore, the introduction of the SDGs did not have an impact on the comparability in this indicator.

7.4.3. Availability of Products and Services for those on Low Incomes, Economic Development in Areas of High Poverty, and Foreign Direct Investment

These three business themes all revolve around the same indicator, but cover the reporting of SDG 1 and 10 (see Appendix H). Table 5 presents the level of information in 2014.

Table 5 – Reporting Year 2014

Indicator	Complete	Partially	In G4 Content Index, not in the report	Not
G4-EC8	0	3	3	0
Total	**0**	**3**	**3**	**0**

All banks stated that they reported on this indicator. However, none of the banks reported to the full extent of the requirements (see Appendix J). The three banks in the Partially column reported general information about their role as a financial intermediary or the general impact on their supply chain (see Appendix N; Appendix P; Appendix T). The indicator requires more detailed information about the indirect economic effects such as the growth or contraction in the organisations' supply chain (Global Reporting Initiative, 2015b). Due to the lack of reporting, it is not possible to compare the content of the banks regarding this indicator in 2014.

For 2015, Table 6 below summarises the reporting of the banks.

Table 6 – Reporting Year 2015

Indicator	Complete	Partially	In G4 Content Index, not in the report	Not
G4-EC8	0	4	2	0
Total	**0**	**4**	**2**	**0**

None of the banks reported fully on this indicator in 2015. Still, the number of banks that reported partially on the indicator increased to four in 2015 (see Appendix K). The four banks that reported partially on the indicator included similar information as in 2014 (see Appendix M; Appendix O; Appendix Q; Appendix S). It is therefore not possible to draw comparisons between banks in 2015 either.

Overall, it is not possible to make comparisons of content reported by banks due to the lack of reporting by the majority in both 2014 and 2015. Even a comparison between the banks that would report partially on the indicator would not be possible, as the information is not specific enough. Thus, the introduction of the SDGs did not have an effect on the comparability of reports for this indicator.

7.4.4. Earnings, Wages and Benefits

This business theme includes one indicator and covers SDG 1 (see Appendix H). The level of information in the reports for 2014 is summarised in Table 7 below.

Table 7 – Reporting Year 2014

Indicator	Complete	Partially	In G4 Content Index, not in the report	Not
G4-EC5	0	1	1	4
Total	**0**	**1**	**1**	**4**

Only one bank actually reported on this indicator and only partially (see Appendix J). This bank reported the ratio of standard level entry-level wage compared to the local minimum wage but not by gender (see Appendix P). One bank stated that they report on the indicator but referred to other sources than the annual or CSR report and the remaining four did not mention this indicator at all (see Appendix J). Therefore, it is not possible to make comparisons of the reports as only one bank reported on this indicator.

The numbers for 2015 are identical to those in 2014 and are summarised in Table 8 below.

Table 8 – Reporting Year 2015

Indicator	Complete	Partially	In G4 Content Index, not in the report	Not
G4-EC5	0	1	1	4
Total	**0**	**1**	**1**	**4**

None of the banks reported to the full extent of the requirements and the bank, which did partially report on the indicator, was the same as in 2014 and it reported on the indicator in the same manner (see Appendix J; Appendix K; Appendix Q). As in 2014, one bank reported in another place than the annual or CSR report and the remaining four did not report at all (see Appendix K).

Therefore, it is not possible to compare the information in the reports due to the lack of disclosure on this indicator.

Overall, it is not possible to make comparisons between the reports on this indicator in both 2014 and 2015 due to the lack of reporting. Therefore, the introduction of the SDGs did not have an effect on the comparability of reports for the G4-EC5 indicator.

7.4.5. Equal Remuneration for Women and Men

This business theme covers SDG 10 and includes one indicator (see Appendix H). Table 9 below summarises the reporting of banks in 2014.

Table 9 – Reporting Year 2014

Indicator	Complete	Partially	In G4 Content Index, not in the report	Not
G4-LA13	0	1	2	3
Total	**0**	**1**	**2**	**3**

Three banks stated that they reported on this indicator despite only one actually did (see Appendix J; Appendix P). The two other banks reported general information, which is not what the indicator requires (see Appendix R; Appendix V). For 2014, it is not possible to make comparisons between banks, as the majority did not disclose the necessary information.

For 2015, the banks' reporting did not change as Table 10 below reveals.

Table 10 – Reporting Year 2015

Indicator	Complete	Partially	In G4 Content Index, not in the report	Not
G4-LA13	0	1	2	3
Total	**0**	**1**	**2**	**3**

The bank that reported partially disclosed the same information in 2015 as in 2014 (see Appendix Q). The banks that stated they reported on the indicator included the same general information in 2015 as in 2014 (see Appendix S; Appendix W). Therefore, comparisons of the disclosed information cannot be made in 2015 either, as only one bank disclosed the required information.

Overall, due to lack of reporting it is not possible to make comparisons between the reports in neither 2014 nor 2015. The other reporting banks just disclosed general information about their salary policies. As a result, the introduction of the SDGs did not have an effect on comparability of information for this indicator.

7.4.6. Greenhouse Gas Emissions

This business theme is part of reporting on SDG 13 and uses three indicators to disclose information about the emissions of an organisation (see Appendix H). These indicators are quite interesting, as GRI has sector-specific additions to these indicators that revolve around the emissions of investment portfolios (Global Reporting Initiative, 2013). Exactly this has been a stakeholder concern as mentioned previously in chapter 6.

In 2014, none of the banks reported on the emissions from their financing portfolios or even mentioned this in their reporting, but only reported on emissions related to their own business activities (see Appendix L; Appendix N; Appendix P; Appendix R; Appendix T; Appendix V). Table 11 below summarises the extent of reporting of banks in 2014.

Table 11 – Reporting Year 2014

Indicator	Complete	Partially	In G4 Content Index, not in the report	Not
G4-EN15	0	5	1	0
G4-EN16	0	5	1	0
G4-EN17	0	5	1	0
Total	**0**	**15**	**3**	**0**

None of the banks reported in a complete way on any of the three indicators related to emissions (see Appendix J). None reported about their consolidation method and only one bank reported on their source of emissions factor and the Global Warming Potential (GWP) rate (see Appendix J). In terms of reporting methodology, standards and assumptions applied only four banks disclosed some of the information needed (see Appendix J). For 2014 it is not possible to compare the reported content of banks, as it is not known how banks arrived at the disclosed CO2 emissions numbers.

In 2015, neither of the banks reported or mentioned emissions relating to their financing portfolios (see Appendix M; Appendix O; Appendix Q; Appendix S; Appendix U; Appendix W). However, banks continued to report on emissions related to their own organisational activities. Table 12 below summarises the reporting of banks in 2015.

Table 12 – Reporting Year 2015

Indicator	Complete	Partially	In G4 Content Index, not in the report	Not
G4-EN15	0	5	1	0
G4-EN16	0	5	1	0
G4-EN17	0	5	1	0
Total	**0**	**15**	**3**	**0**

As in 2014, none of the banks reported fully on the three indicators in 2015 (see Appendix K). None of the five banks reported on the chosen consolidation method for any of the indicators (see Appendix K). However, two banks started to report their base year of their calculation, albeit without explaining the reasons why this base year was chosen, as compared to none in 2014 (see Appendix J; Appendix K). In terms of reporting on methodology, assumptions and standards only four banks disclosed part of the information required (see Appendix K). Two banks reported on the emissions factor and Global Warming Potential used in the calculation for GHG emissions for different indicators (see Appendix K).

In 2015, it is not possible to draw comparisons between the reported content of the banks due to the lack of reporting of the methodology, assumptions and standards used in the calculation of emissions.

Overall, despite the majority of banks reporting their total CO2 emissions for all three indicators in both years it is not possible to compare the reported content. The lack of consistent and comprehensive reporting on the assumptions, methodology and standards used for the calculation of emissions makes any comparison of the disclosed information of banks unreliable, as it is not fully understood how the banks arrived at these numbers. Therefore, the introduction of the SDGs had no effect on these indicators, as the reporting issues from 2014 are still present in 2015.

7.4.7. Infrastructure Investments, Research and Development, and Environmental Investments

The *Infrastructure Investments* business theme covers the reporting of SDG 9 and 11 and is reported using information about infrastructure as well as research and development (R&D) as part of banks' community investments from the G4-EC1 indicator and the information about infrastructure or services supported reported in G4-EC7 (see Appendix H). The G4-EC1 indicator and the G4-EN31 indicator cover the reporting for the business theme of *Research and Development*, and G4-EN31 covers the disclosure requirements for the *Environmental Investments* business theme (see Appendix H). Both business themes are part of SDG 9 (see Appendix H) and Table 13 below summarises the reporting level of banks in 2014 for all indicators.

Table 13 – Reporting Year 2014

Indicator	Complete	Partially	In G4 Content Index, not in the report	Not
G4-EC1	0	5	1	0
G4-EC7	0	6	0	0
G4-EN31	0	2	0	4
Total	**0**	**13**	**1**	**4**

In reporting on indicator G4-EC1 only two banks reported about their community investments, but they did not disclose any detailed information (see Appendix P; Appendix R). Therefore, it is not known whether infrastructure and R&D are included in their community investments. In reporting indicator G4-EC7 all the banks disclosed some of the required information. However, they reported general information without the necessary details in order to make reliable comparisons (see Appendix J; Appendix L; Appendix N; Appendix P; Appendix R; Appendix T; Appendix V). Furthermore, all banks reported about the positive impacts in the financing of infrastructure investment as part of investment portfolios (see Appendix J; Appendix L; Appendix N; Appendix P; Appendix R; Appendix T; Appendix V). It is not clear whether this is part of the information included by this indicator as the description provided from GRI is not specific about this (Global Reporting Initiative, 2015b). In reporting the G4-EN31 indicator none of the banks reported to the full extent of the requirements in 2014 (see Appendix J). The two banks that reported partially both disclosed information on their investments in energy efficiency plans for their organisations (see Appendix L; Appendix P).

Overall, it is not possible to compare the reported content for the indicators, as banks either did not disclose the correct information or did not disclose at all. The banks did disclose information for the G4-EC7 indicator, but lack the necessary details for reliable comparisons to be made. Therefore, the introduction of SDGs did not have an effect on the comparability of the content for these three indicators.

In 2015, the reporting of the indicators has changed slightly as summarised in Table 14 below.

Table 14 – Reporting Year 2015

Indicator	Complete	Partially	In G4 Content Index, not in the report	Not
G4-EC1	0	6	0	0
G4-EC7	0	5	1	0
G4-EN31	0	1	0	5
Total	**0**	**12**	**1**	**5**

All banks reported on the G4-EC1 indicator, but all failed to provide information about investments in infrastructure and R&D as part of their community investment (see Appendix K; Appendix M; Appendix O; Appendix Q; Appendix S; Appendix U; Appendix W). In the G4-EC7 indicator five banks disclose general information about their positive impacts through infrastructure investments, but as part of their investment portfolio and not investment in operations (see Appendix M; Appendix O; Appendix S; Appendix U; Appendix W). Only one bank reported on indicator G4-EN31 in 2015, where it disclosed information on its energy efficiency plan (see Appendix M). Therefore, due to banks either not disclosing the right information or not disclosing at all, it is not possible to make comparisons of content for the three indicators for both reporting years.

Overall, since the banks either did not disclose the right detailed information or did not disclose at all it is not possible to perform comparisons of the disclosed information for the three indicators in this business theme for both reporting years. Therefore, there has been no effect on the comparability of the reported content for these indicators by the introduction of the SDGs.

7.4.8. Responsible Finance

This business theme uses two indicators in reporting progress and covers SDG 10 (see Appendix H). Table 15 below summarises the reporting of these indicators in 2014.

Table 15 – Reporting Year 2014

Indicator	Complete	Partially	In G4 Content Index, not in the report	Not
FS10	0	0	3	3
FS11	0	2	2	2
Total	**0**	**2**	**5**	**5**

Despite these indicators being designed specifically for the financial sector, none of the banks reported on FS10 and only two banks reported on FS11 (see Appendix J). Therefore, comparisons on the FS10 indicator are not possible, as there is no information to compare. The two banks reporting on FS11 only disclosed general information about their criteria for their positive and/or negative sustainability screen and not any percentages of total assets screened (see Appendix P; Appendix T). As none of the banks reported on the FS10 indicator and the required information for the FS11 indicator, it is not possible to compare the reported content of banks in 2014.

For reporting year 2015, Table 16 below summarises the reporting of the two indicators.

Table 16 – Reporting Year 2015

Indicator	Complete	Partially	In G4 Content Index, not in the report	Not
FS10	0	0	3	3
FS11	0	2	2	2
Total	**0**	**2**	**5**	**5**

The issues with the reporting in 2015 are the same as in 2014, because none of the banks reported on indicator FS10 and two banks that reported on FS11, only disclosed general information about their criteria for the sustainability screens they perform (see Appendix K; Appendix Q; Appendix U). It is therefore not possible to perform comparisons of the reported content in 2015.

Overall, as none of the banks reported on the FS10 indicator and none reported the required information for the FS11 indicator, comparability is not enabled in the reports for both years. Therefore, the introduction of the SDGs did not have an effect on the comparability of the reported content for these two indicators.

7.4.9. Sustainable Transportation

This business theme covers SDG 11 and includes one indicator to disclose relevant information (see Appendix H). For 2014 the reporting of banks is summarised in Table 17 below.

Table 17 – Reporting Year 2014

Indicator	Complete	Partially	In G4 Content Index, not in the report	Not
G4-EN30	0	4	0	2
Total	**0**	**4**	**0**	**2**

None of the banks reported to the full extent of the indicator (see Appendix J). Three of the reporting banks disclosed in formation about their CO2 emissions from the transportation of employees, but did not report on other environmental impacts related to this (see Appendix L; Appendix N; Appendix P). The fourth reporting bank also reported information related to the transport of employees, but reported passenger kilometres or the distance travelled in kilometres by passengers (see Appendix T). All four banks reported their efforts to mitigate their environmental impacts, but none of them managed to report the criteria and methodology used to decide which environmental impacts are significant for their organisation (see Appendix L; Appendix N; Appendix P; Appendix T). As not all banks reported on this indicator it is not possible to compare the content for all banks in 2014. Even for the three banks that did disclose the CO2 emissions from their business travel it is not possible to make reasonable comparisons, as the methodology and criteria used to calculate the emissions are not disclosed for any of those banks (see Appendix J).

In 2015 nothing has changed from 2014 as illustrated in Table 18. Four banks disclose some of the required information and the remaining two banks did not report at all.

Table 18 – Reporting Year 2015

Indicator	Complete	Partially	In G4 Content Index, not in the report	Not
G4-EN30	0	4	0	2
Total	**0**	**4**	**0**	**2**

The four reporting banks disclosed information on CO2 emissions related to their business travel, and they all reported on their efforts to reduce these impacts (see Appendix K; Appendix M; Appendix O; Appendix Q; Appendix U). Nevertheless, none of them reported the methodology or criteria used to determine which environmental impacts were significant (see Appendix M; Appendix O; Appendix Q; Appendix U). Therefore, comparisons between the banks cannot be performed as not all banks reported the required information. Even the disclosed information of reporting banks on CO2 emissions cannot be compared, as the methodology and criteria used to calculate the emissions are not reported by all of them (see Appendix K).

Overall, comparisons of the reported content cannot be made in either 2014 or 2015, as not all banks disclosed the required information. Even for the reporting banks, comparability is not enabled in the reported content, as the methodology and criteria for calculating emissions are not disclosed.

7.5. Conclusion to Chapter

The analysis examined the accounting polices applied by banks alongside the reported material aspects and the banks' stakeholder inclusion efforts. Moreover, the reported information of banks for the selected indicators was examined to determine whether they reported to the full requirements of the GRI G4 Guidelines for the reporting years 2014 and 2015.

All the banks claim to adhere to the G4 Guidelines, which should enable comparability of the banks' CSR reports, as they all use the same framework to guide their report preparation. All the banks in the analysis considered the aspects of the selected indicators material either by reporting this at an indicator level or in the reporting of their materiality matrices. Moreover, not all the banks defined their organisational boundaries and whether they considered material aspects to be within or outside these boundaries. This does not enable comparability between the CSR reports, as some banks might include their entire organisation down to the last subsidiary and others might not. All the banks reported that they included stakeholders in determining their material issues. However, the majority of them did not report in details, who these stakeholders are and whether they are part of the report preparing process. The inclusion of stakeholders is important in the process of determining the material aspects of organisations for the CSR reports.

Despite all the banks stating that they report using the G4 Guidelines, not one of them reported on all the indicators in a manner that fully satisfies the reporting requirements. This is also applicable to the four banks that chose the accordance level comprehensive. When banks did report, they tended to report information of general nature and did not provide the details necessary to enable trustworthy and reliable comparisons between them. Therefore, due to the lack of reporting on indicators and lack of details when reporting it is not possible to make comparisons between the reported content of the banks' reports in either 2014 or 2015. Therefore, this analysis reveals that there is no observed effect of the introduction of the SDGs on the comparability of the reports.

8. Discussion

The discussion examines the effects of institutional pressures on banks in order to explain the empirical findings described in the previous chapter. More specifically, the discussion explains through the lens of isomorphism why banks report on CSR and include the SDGs in reporting. The chapter first examines the coercive pressures that drive isomorphism. Second, the mimetic pressures that drive isomorphism are examined, followed by the normative pressures that drive isomorphism in the reporting of the banks in the analysis. Finally, a conclusion to the chapter is provided, summarising the different pressures driving isomorphism in the reporting of the banks.

8.1. Coercive Isomorphism in Banks' CSR Reporting

The two sources of coercive pressure on banks to adopt CSR and SDG reporting are the European Union (EU) and investors. These sources of coercive pressure are examined separately below.

The EU influences the CSR reporting of banks as almost all of them, the exception being Credit Suisse, are headquartered in a EU member state. In 2014 the European Parliament and the European Council adopted Directive 2014/95/EU amending the 2013/34/EU accounting directive to require organisations to report on non-financial information (European Parliament & European Council, 2014). The European Commission recognised the need to introduce legislation that would even out an imbalance in non-financial reporting of EU member states (European Parliament & European Council, 2014). Furthermore, the European Parliament highlighted the role of corporate reporting on sustainability information in order to achieve a sustainable global economy (European Parliament & European Council, 2014).

The new Directive requires all European companies, including the banks in the analysis, to disclose non-financial information regarding certain areas. Particularly, the banks are to disclose their policies regarding respect for human rights, anti-corruption, bribery, environmental, social and employee matters, and if they do not have any policies in these areas, they must disclose the reasons why (European Parliament & European Council, 2014). The European Commission released a set of non-binding guidelines on reporting non-financial information using the SDGs and GRI as inspirations in drafting these guidelines (European Commission, 2017). Moreover, the European Commission also mentions how its reporting guidelines support the implementation and achievement of the SDGs (European Commission, 2017).

As a consequence of the Directive the number of banks in Europe engaging in CSR reporting could increase. After the introduction of the CSR legislation in Denmark, Pedersen et al. (2013) concluded from their analysis that coercive pressures from governments impacted the CSR reporting of companies. This impact was especially high for first time reporters, which highlighted the importance of regulatory requirements in promoting CSR reporting in Denmark (Pedersen, Neergaard, Pedersen, & Gwozdz, 2013). Therefore, the regulatory requirements from the European Union could produce similar a development in the CSR reporting of banks in the European context. In addition, the emphasis put on the SDGs in the reporting guidelines could drive an increase in SDG reporting of European banks.

The Directive does not require companies to comply until 2018 covering the financial year of 2017 (European Commission, 2017). Therefore, the banks in the analysis are not directly affected by it at the time of writing. Nevertheless, the anticipation of the Directive and the endorsement of the SDGs by the European Union may have influenced the banks to include the SDGs in their 2015 reports. The support of the SDGs by the EU therefore acts as a pressure on the banks to include them in their reporting, as isomorphism related to law and institutional norms give legitimacy to different practices (Matten and Moon (2004) in Amor-Esteban, García-Sánchez, & Galindo-Villardón, 2017). The banks gain legitimacy through their CSR practices, as they are already reporting as required and recommended by the directive (law) through the non-financial guidelines, which endorses the inclusions of SDGs in CSR reports (norms).

Despite these coercive pressures of the EU Directive on banks, it is not guaranteed that all banks will disclose non-financial information. In the case of the French law on the disclosure of non-financial information only 35 per cent of French companies adhered to the regulatory requirements two years after its introduction (Chauvey, Giordano-Spring, Cho, & Patten, 2015). This is partially explained by the law not being specific as well as the lack of sanctions imposed when not complying with the law (Chauvey et al., 2015).

The new EU Directive is not telling the banks how to comply with it in details, as it is up to them to decide what framework they want to use in their reporting (European Parliament & European Council, 2014). In addition, the new Directive is a “comply or explain” type of legalisation and this could hinder its intended impacts. According to a CSR Expert, due to the comply or explain nature of the law on the disclosure of non-financial information in Denmark only the largest companies who are part of C20 and Large Cap produce CSR reports (see Appendix Y, Time Stamp [TS] 11:04). Nevertheless, the CSR Expert does believe that authorities have an important role to play in increasing the reporting of businesses on the SDGs, but they need to define what indicators they want the companies to measure (see Appendix Y, TS 12:39).

Enforcement of law needs to be incorporated in any legislation regarding the protection of stakeholders (Garcia-Sanchez, Cuadrado-Ballesteros, & Frias-Aceituno, 2016). Enforcement of regulatory requirements is more effective than having extensive protection laws in order to improve corporate governance and to decrease the information asymmetry between an organisation and their stakeholders (Garcia-Sanchez et al., 2016). Therefore, the Directive has to be enforced by the EU in order to make banks disclose non-financial information, which will reduce the information asymmetry between the banks and their stakeholders.

As a result of an efficient law enforcement mechanism, the CSR disclosure practices of firms would also be at a higher level, ceteris paribus (Garcia-Sanchez et al., 2016). Therefore, there needs to be an efficient law enforcement mechanism to the EU Directive in order to get the banks to disclose non-financial information at a higher level. The consequences of the lack of an efficient law enforcement mechanism are illustrated by the CSR legislation in Denmark. Companies can use links to external webpages in the reporting of non-financial information as long as these are deep and precise according to the legislation (see Appendix Y, TS 48:37). Nevertheless, not all companies using these disclosure practices comply with the rules regarding these links (see Appendix Y, TS 48:37). Furthermore, companies are also required to report specifically on human rights, which is not fulfilled by all (see Appendix Y, TS 50:01). There have been no sanctions imposed on these companies, as no one knows what these sanctions should be (see Appendix Y, TS 50:01).

The European Union is one source of coercive pressure on the banks to report their CSR practices and to include the SDGs in their reports. Another important source of coercive pressure is the investors of the banks. The intensity of coercive pressure from investors depends on the type of investor. A study by Wang et al. (2011) on the investing behaviours of financial investors found that institutional investors appeared to include the CSR performance of listed companies, as they had different investment strategies depending on their CSR performance (Wang, Qiu, & Kong, 2011). The CSR Expert also believes that institutional investors are interested in companies reporting on environmental, social and governance (ESG) issues (see Appendix Y, TS 33:42). As a result, in order to attract institutional investors the banks need to disclose information about their CSR performance, as this guides the investment strategies of institutional investors. Moreover, this could explain why the banks tend to disclose information related to their positive impacts and to not include information about their negative impacts.

Despite institutional investors publicly state that they consider the CSR performance of companies in their investment strategies, evidence suggests that this might not be the case (Harjoto, Jo, & Kim, 2015). In their study on the relation between institutional ownership and CSR and its impacts on stock volatility, Harjoto et al. (2015) concluded that this relation was concave and that the evidence showed that institutional investors did not necessarily undertake investments in CSR firms due to the consideration of social values in their investment strategies (Harjoto et al., 2015). Most institutional investors only perform negative screenings in which they define what they will not invest in, but they do not do the opposite, that is perform positive screenings (see Appendix Y, TS 33:42). If institutional investors performed positive screenings this would boost the share price of the companies performing well (see Appendix Y, TS 33:42). For the banks in the analysis, this means that it is unlikely that institutional investors will avoid investing in them due to their CSR performance. This is because institutional investors usually avoid investing in certain sectors (see Appendix Y, TS 33:42). Therefore, until institutional investors perform positive screenings, they are likely to include the banks in their investment portfolio.

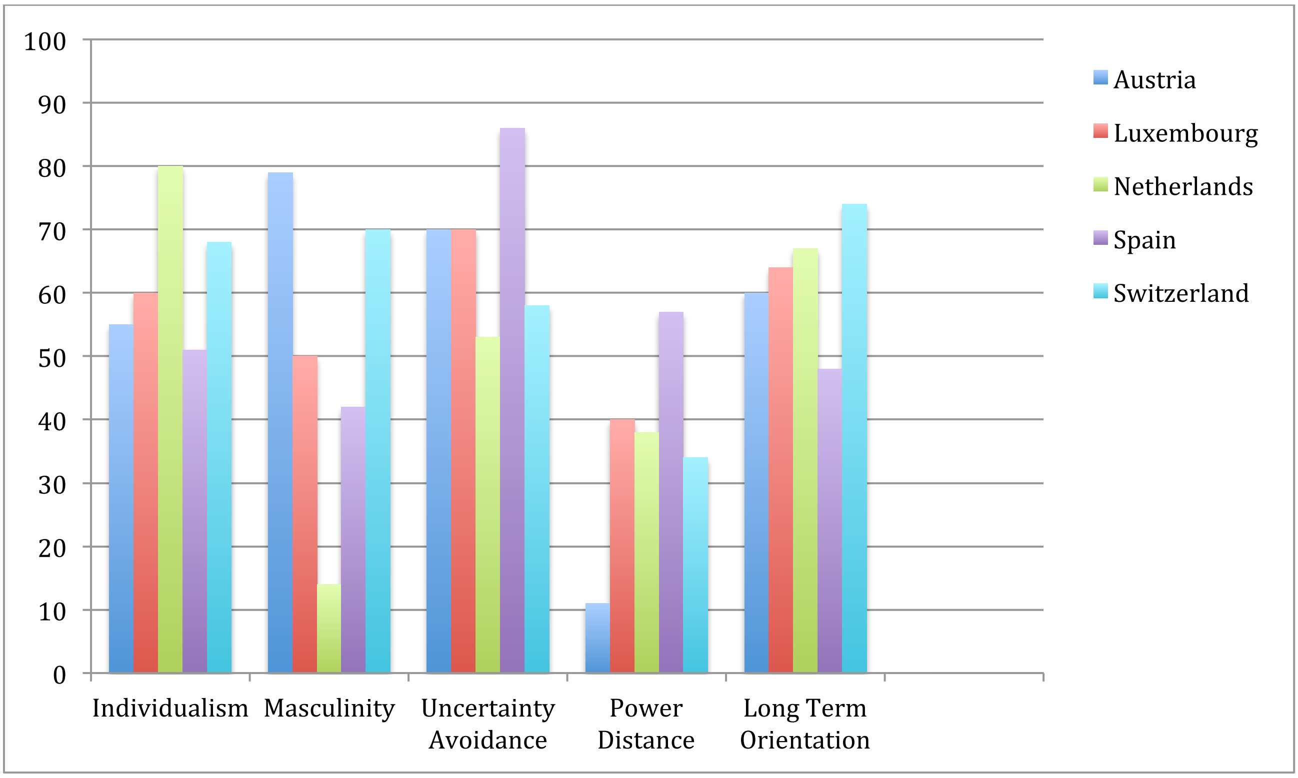
The EU and the banks' investors are considered to be the two major sources of coercive pressure on the CSR reporting practices. However, as the *Sustainable Development Goals* chapter illustrated other stakeholders have started to put pressure on banks into conforming to certain behaviours. These type of stakeholder concerns incentivise the managers of companies to publish CSR reports in order to defend their companies as it gives them the chance to draw away any negative attention by highlighting their positive activities (Shabana, Buchholtz, & Carroll, 2016). As a result, the banks are likely to increase their CSR reporting activities in order to deflect the attention from their negative impacts by highlighting their positive impacts through their reports.

8.2. Normative Pressures in Banks' CSR Reporting

The two sources of normative pressure on the banks explaining the convergence of the banks' CSR reports are national culture and the exclusion of financial employees in the report preparation process. These sources of normative pressure are examined separately below.

A study from Garcia-Sanchez et al. (2016) found that national culture affects the level of CSR disclosure practices of companies. The scholars used the cultural dimension model by Hofstede to map out the characteristics of national cultures, and using this model they developed five hypotheses (see Appendix Z), which they tested and found evidence for (Garcia-Sanchez et al., 2016). In order to explain the influence of cultural systems on the CSR disclosure of banks in the analysis the cultural dimension scores for the countries of the banks head quarters are illustrated in Figure 3 below.

Figure 3 – The Cultural Dimension Scores of the Countries of Banks' Head Quarters



Scores obtained from the Hofstede Insight compare countries model, comparing Austria, Luxembourg, Netherlands, Spain and Switzerland.

According to Garcia-Sanchez et al. (2016), a higher level of CSR disclosure is present when companies are located in countries that score low on the individualism, masculinity, uncertainty avoidance and power distance dimensions and score high on the long term orientation dimension (Garcia-Sanchez et al., 2016). When summing up the level of information by each part of the indicators in the analysis, the banks located in Spain and Austria score the highest number in having parts classified as complete and partially (see Appendix J; Appendix K). In the case of the Spanish banks this is, according to Garcia-Sanchez et al. (2016), due to their low score on the Individualism dimension and to some extent the Masculinity dimension. The high scores on the Uncertainty Avoidance, Power Distance and Long-Term Orientation dimensions could explain why their scores are not higher. In the case of the Austrian bank the low score on the Power Distance dimension and the high score on the Long-Term Orientation dimension explains they are in the top whereas the high scores on the Individualism, Masculinity and Uncertainty Avoidance dimensions explains why scores are not higher. Nevertheless, these banks are not exceptionally better in their CSR disclosure practices than the other banks. Overall, for all banks the high scores on the Individualism, Masculinity (except for the Dutch bank) and Uncertainty Avoidance decrease the level of CSR disclosure practices or the number of complete and partially classifications they received. On the other hand, the low score on the Power Distance dimension (except for the Swiss bank) and the relatively high score on Long-Term Orientation dimension increase their level of CSR disclosure practices.

The CSR expert also considers culture as a driver of the level of CSR disclosure practices and refers to the CSR practices in Asia (see Appendix Y, TS 1:00:52; 1:01:54; 1:02:08). The CSR expert argues that the Asian CSR practices are at a higher level than their European counterparts (see Appendix Y, TS 1:00:52; 1:01:54; 1:02:08). The CSR Expert points to the customer focus of Asian companies to drive the higher level whereas in Europe companies tend to focus on their supply chain and developing codes of conduct (see Appendix Y, TS 1:02:08). Nevertheless, the CSR expert does not believe that differences between regions is the main reason explaining the CSR reporting of companies. The main reason is the failure to include the financial people in the report preparing process, which will be examined in the following section.

According to the CSR expert, not engaging the financial employees in the preparation of the report results in the data disclosed not being reliable or representative (see Appendix Y, TS 17:32; 18:21). Or in other words, the quality of the data is poor because the non-financial employees do not have the right tools to produce good quality data (see Appendix Y, TS 18:21). As non-financial employees do not possess the right knowledge within data and in particular data discipline, they end up using whatever available data (see Appendix Y, TS 18:21). An example of this type of data is data regarding salary from an HR system that only covers the white-collar workers of a company, but is claiming to cover the entire company in a report (see Appendix Y, TS 29:09). In the case of the banks in the analysis, it is also likely that the financial employees have not been part of collecting and preparing the data for the reports. Therefore, the employees preparing the banks' reports do not have the necessary knowledge of data discipline to produce good quality data.

A solution to the problem of poor quality data could be collaboration between the non-financial and financial employees, as the financial employees have the knowledge on getting good quality data and data discipline (see Appendix Y, TS 18:21). Moreover, this is a less expensive solution for the banks, as many of them already have the right systems in place being used by the financial employees (see Appendix Y, TS 18:21). Therefore, without the financial employees engaged in the process, the non-financial employees often have to start from scratch (see Appendix Y, TS 18:21). This is expensive and increases the difficulties in making a convincing business case to the banks' CFOs (see Appendix Y, TS 18:21).

The business case that has to be made is one where the focus of CSR is risk management, as issues such as extreme weather or legislation regarding the environment will impact the financial performance of banks in the future (see Appendix Y, TS 20:56). Until the financial and non-financial employees collaborate on the banks' CSR practices this business case will never be made, as the financial employees are not aware of these types of risks (see Appendix Y, TS 20:56). Overall, the CSR expert advocates for a different perspective on CSR than the current one. Instead of emphasising the impacts of banks on the environment and societies the impacts on the banks should be emphasised (see Appendix Y, TS 35:56). Then one of the most important stakeholder groups will be activated namely the banks' investors (appendix Y: TS 35:56; 37:31).

In activating the financial employees of the banks, the CSR expert argues that International Accounting Standards Board (IASB) has to incorporate these issues into the International Financial Reporting Standards (IFRS), as these issues translate into financial risks (see Appendix Y, TS 35:56). Moreover, engaging the IASB will bring a greater emphasis on data quality, as standards for what is considered good data will be developed (see Appendix Y, TS 45:32). In addition, a sense of "humbleness" will be incorporated into the reporting, as it is not allowed to boast about performance in financial reports without documentation (see Appendix Y, TS 45:32).

The Task Force on Climate-related Financial Disclosures (TCFD) is a new initiative that could lead the way towards improved data quality in the CSR reporting of banks (see Appendix Y, TS 59:27). The mission of TCFD is to develop financial disclosures related to climate change, which could trigger a new form of CSR reporting (see Appendix Y, TS 35:56; 59:27). Furthermore, the CSR expert believes that the founders of the initiative could put enough pressure on IASB to incorporate their disclosures in the IFRS framework (see Appendix Y, TS 37:50). In activating the IASB, new CSR reporting models would be created, increasing the data quality of reports. Therefore, the IASB has the potential to become the source where new CSR reporting models diffuse. As a result, the banks following the IFRS guidelines for their financial reporting would have to disclose information on certain sustainability issues, as these are considered as risks to their financial performance.

8.3. Mimetic Pressures in Banks' CSR Reporting

This section discusses the two sources of mimetic pressures to isomorphism in the CSR reporting of banks in the analysis. As DiMaggio and Powell (1983) hypothesise: "*The greater the extent to which technologies are uncertain or goals are ambiguous within a field, the greater the rate of isomorphic change*" (DiMaggio & Powell, 1983, p. 156). Therefore, the two sources examined are the goal ambiguity of the SDGs and lack of knowledge on how to incorporate them in CSR reporting.

In the CSR reporting of banks, the source of mimetic pressure stems from the goal ambiguity of the SDGs, as they were not developed for business reporting but for the reporting of countries reporting (see Appendix Y, TS 02:13). As goal ambiguity is a driver of mimetic isomorphism, it is predicted that this will cause banks to experience mimetic pressure to copy other banks. Moreover, the lack of clear guidelines on how business should report on the SDGs further increases these mimetic pressures. GRI and the UN Global Compact are currently working on a Practical Guide to Define Priorities and Reporting for corporate reporting on the SDGs, but these will not be released until sometime in January 2018 (PWC, n.d.).

As the practical guide to SDG reporting is not yet released, the banks did not have any guidance on how to report on the SDGs for 2015. As a result of this uncertainty, the mimetic pressures on banks intensify and they are likely to copy one another in order to manage this uncertainty. In addition, as the number of alternatives is low the rate of isomorphism is faster (DiMaggio & Powell, 1983). Moreover, poor quality data in CSR reporting could also be explained by the lack of alternatives. If IASB were to incorporate non-financial disclosure in IFRS, then the banks using IFRS for financial reporting are likely to adopt these guidelines instead of copying each other.

Going forward, until the goal ambiguity of the SDGs is dealt with and a set of reporting guidelines are published, it is likely that banks reporting on SDGs for the first time will copy the banks in the analysis. In their study Pedersen et al. (2013) found it reasonable to assume that first time reporters copied other organisations with a longer tradition of CSR reporting (Pedersen et al., 2013). After the introduction of the CSR legislation in Denmark, first time reporters were inclined to mimic organisations with a longer tradition for CSR reporting all the way down to which indicator they reported on (Pedersen et al., 2013). In addition, the CSR expert explains that companies in Denmark tend to model their CSR reporting practices after the company who won the CSR award and, as a result, certain reporting practices continue to trend for some years (see Appendix Y, TS 1:02:57). This could be explained by the uncertainty between means and ends, as explained by DiMaggio and Powell: *"The more uncertain the relationship between means and ends the greater the extent to which an organization will model itself after organizations it perceives to be successful"* (DiMaggio & Powell, 1983, p. 154). This effect is also likely to be present for the banks in the analysis, as the more uncertain they are about how to report CSR, the more likely they are to copy other banks whom they perceive to be successful.

The increasing focus on the role of banks in certain sustainability issues demonstrates that banks are facing an increasing level of uncertainty due to their investment practices. Previously, they tended to be more in the background and did not have to manage these types of stakeholder concerns. As a result, banks might use CSR and SDG reporting as means to restore and regain legitimacy. CSR reporting in Italy has been found to be used to gain legitimacy in a time of crisis (Cantele, 2014), and these increasing stakeholder concerns could potentially evolve into a crisis for the banks in the analysis if left unmanaged. Therefore, in the event of a crisis banks are expected to turn to CSR and SDG reporting to increase their legitimacy.

8.4. Conclusion to Chapter

Banks are experiencing coercive pressures in regards to CSR and SDG reporting from two sources: the European Union and investors. The new EU Directive on reporting non-financial information pressures banks to report their CSR policies, and the endorsement of the SDGs in the guidelines presents an opportunity for banks to obtain legitimacy by including them in their CSR reports. Nevertheless, the new Directive does not guarantee that the level of CSR reporting increases, as it is not specified how companies are supposed to report. Moreover, the enforcement of the Directive is equally important as the implementation. The second source of coercive pressure is the banks' investors. It is mostly institutional investors that would be interested in the CSR practices of the banks, as this is usually reflected in their investment strategies albeit mainly by the use of negative screening. If institutional investors started performing positive screening, this could boost the share price of banks with a high CSR performance.

The two sources of normative pressures for banks stem from the national culture of the countries where the banks have their headquarters, and from not including their financial employees in their CSR practices. In analysing the effects of national culture on CSR reporting of banks, the scores generated from Hofstede's cultural dimensions model explain the level of CSR practices. The high scores of banks on Long-Term Orientation and low score on Power Distance dimensions increase the level of their CSR reporting according to Garcia-Sanchez et al (2016). In addition, the high scores on the Individualism, Masculinity and Uncertainty Avoidance dimensions decrease the level of the banks' CSR practice. Therefore, these scores could be considered to have an impact on the CSR reporting practices of the banks and partially explain the low level of disclosure. Banks located in Asia seem to produce reports of higher quality according to the CSR expert, which also indicates that culture is a factor determining the level of CSR practices.

Nevertheless, the main reason for the low level of CSR reporting practices is the lack of good quality data. This is due to the financial and non-financial employees not collaborating on the CSR practices of companies. A new perspective on CSR is needed in order to engage the financial employees who have the tools to increase the quality of the data. This perspective needs to be rooted in risk management, where sustainability issues are translated into financial risk for the company. This is exactly what the TCFD is working on, and the founders of this initiative could be able to pressure IASB into including non-financial indicators in its IFRS framework, which would also engage the financial employees. In addition, IASB would bring a focus on data quality and standards that define what is good quality data will be developed.

Mimetic pressures of isomorphism in CSR reporting stem from two sources: the goal ambiguity of the SDGs and the lack of reporting guidelines. The SDGs were developed for governments to report their progress towards sustainable development in the world and not for companies. Moreover, as there was little guidance available to banks on how to report on the SDGs, they are expected to copy other banks that they perceive as being successful. This mimetic pressure is especially present for banks reporting on the SDGs in the future. In addition, due to the low number of alternatives to SDG reporting other than current reports, this will also drive isomorphism of the reporting. The practical reporting guide to SDG reporting, that is to be released in January 2018, could along with non-financial disclosures in IFRS decrease mimetic pressure on banks, as these could represent alternatives to current reporting.

9. Conclusion and Further Research

When the UN introduced the SDGs in 2015 there was hope that they would lead to a standardisation of CSR reporting. Therefore, this thesis examined the following research question: *What is the effect of the introduction of the SDGs on inter-firm comparability of CSR reports, and how does isomorphism explain the reporting pattern?*

The analysis revealed that the introduction of the SDGs had no effect on the inter-firm comparability of the selected CSR reports of the six European banks, as inter-firm comparability was neither enabled in 2014 nor 2015. Despite all banks stated to adhere to the G4 Guidelines, inter-firm comparability was not present because none of the banks reported all the required information for any indicator. Furthermore, the number of indicators where banks either did not report or claimed to report on indicators in their GCI but neglected to report at all in their reports was high. This was surprising considering that banks did report these issues that the indicators relate to as material in their reports. In addition, the lack of defining organisational boundaries and whether banks considered material issues to be within or outside these boundaries did not enable comparability, as the banks could be excluding parts of the organisation that were significant to assess its CSR performance. Therefore, inter-firm comparability was not enabled neither in 2014 nor 2015, as there was a lack of consistency in the reported content across the banks' CSR reports.

Institutional isomorphism explained the reporting pattern of banks by examining the different pressures stemming from three sources: coercive, normative and mimetic.

The coercive pressures on the reporting of banks stemmed from the EU and the banks' investors. With its new Directive on non-financial reporting, the EU will pressure more banks to report on their CSR performance. For the banks in the analysis, the endorsement of the SDGs by the EU could have led them to include the SDGs in their 2015 reports in order to gain legitimacy. In addition, in order to get the anticipated effect of the new Directive, the EU has to emphasise its enforcement. In terms of the investors, only institutional investors appeared to have an interest in the CSR performance of companies. If these investors would begin to perform positive and not just negative screening, this would boost the share price of high performing companies.

One of the sources of normative pressures that explained the reporting pattern of the banks was the effect of national culture where the banks have their headquarters. The banks' high scores on the Masculinity, Individualism and Uncertainty Avoidance dimensions explained their low level of CSR reporting. Another source of normative pressures that explained the reporting pattern of banks was the exclusion of financial employees in the preparing and collection of data for the report. Financial employees have the necessary knowledge and tools to provide good quality data for the banks' CSR reports, but they have not been working together with the non-financial employees responsible for creating the reports. In order to engage the financial employees, the focus of banks' CSR practices has to be on risk management and IASB has to be engaged and include non-financial indicators in its IFRS framework.

The mimetic pressures that explained the reporting patterns of the banks were the goal ambiguity of the SDGs, as they were not designed for businesses, but for countries. In addition, the lack of guidelines on how to report on the SDGs creates mimetic pressures where banks are likely to copy each other. This pressure is expected to increase for first time reporters, as without any guidance, there are not many other available alternatives. Nevertheless, a practical guide on SDG reporting for businesses is to be published in January 2018. Along with IASB including non-financial disclosures in their IFRS framework, this could potentially decrease if not eliminate this mimetic pressure, as more options will then be available.

The research of this thesis provides insights into the initial effects of the SDGs on CSR reporting by examining whether inter-firm comparability was present in reports from before and after their introduction. Nevertheless, the data set only consisted of reports from six banks and, therefore, future research should include a similar analysis to be performed a later stage were hopefully the number of companies reporting on the SDGs is higher. Moreover, it would be interesting to perform an equivalent analysis in a different sector than the financial services sector in order to discover any different effects from the introduction of the SDGs or different SDG reporting practices of various sectors.

The isomorphic pressures considered in this thesis to explain the reporting pattern of banks stem from the EU, the banks' investors, financial employees amongst others. Future research could include interviews or a survey of potential stakeholders of banks in order to uncover other potential sources of isomorphic pressures than the ones explored in this thesis. This would provide a more detailed understanding of the isomorphic pressures on the CSR reporting of banks and it could clarify some of the reasons why companies choose to report on SDGs.

The non-engagement of the financial employees in the report preparing process, in particular in the data collection process, is considered to be one of the main reasons for poor data quality of reports. Future research could deal with questions regarding how companies can engage their financial employees in this process. These questions could be answered by investigating the reasons as to why the financial employees resist or simply are not interested in this type of reporting. Moreover, studies on the challenges for the engagement of the financial people should also be performed to map out external obstacles that do not necessarily relate to the personal motives of the financial employees.

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Appendices

Appendix A

Table 19 - List of CSR reports by organisation

Organisation	Country of HQ	Report Title	Reporting Year	No. of Pages	Accordance Level	Language
Bankia	Spain	BFA-Bankia Report Year II	2014	200	Core	English
		BFA-Bankia Report Year III	2015	200	Comprehensive	English
Credit Suisse	Switzerland	Corporate Responsibility Report 2014	2014	72	Core	English
		Corporate Responsibility Report 2015	2015	56	Core	English
Grupo Cooperativo Cajamar	Spain	Informe Integrado del Grupo Cooperativo Cajamar 2014	2014	141	Comprehensive	Spanish
		Grupo Cooperativo Cajamar Informe Integrado 2015	2015	96	Comprehensive	Spanish
ING Group	Netherlands	ING Group Annual Report 2014 Empowering People & ING Group	2014	418 & 20	Comprehensive	English

		Sustainability Annex 2014 Empowering People				
		ING Group Annual Report 2015 A Step Ahead	2015	442	Comprehensive	English
RZB Group	Austria	Fit For The Future Through Sustainability RZB Group Sustainability Report 2014	2014	188	Core	English
		Focus On The Material RZB Group Sustainability Report 2015	2015	180	Core	English
The European Investment Bank	Luxembourg	Sustainability Report 2014	2014	56	Comprehensive	English
		Sustainability Report 2015	2015	56	Comprehensive	English

Appendix B

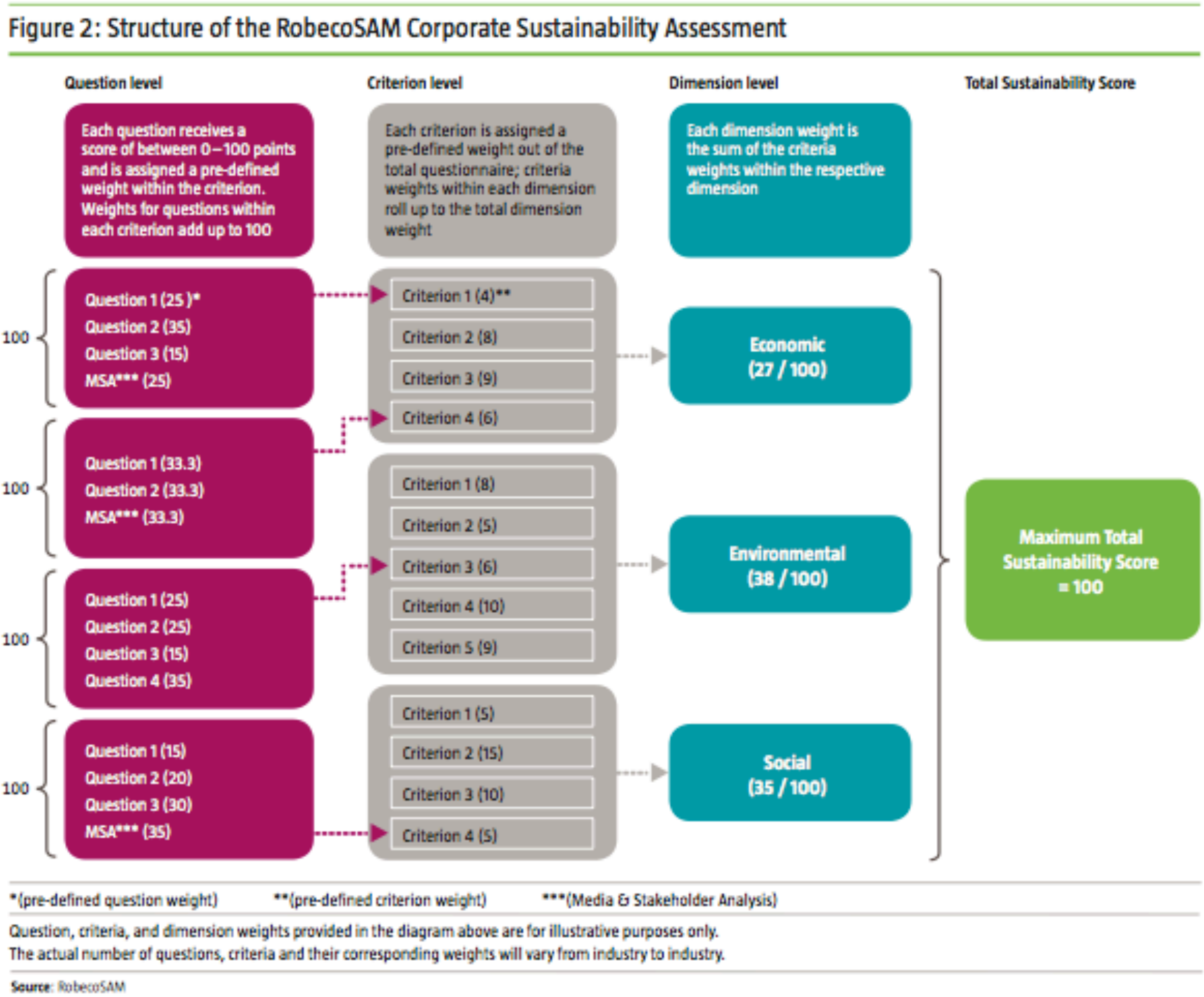
Table 20 - Hypothesis of Powell and DiMaggio

	Hypothesis	**Type of Isomorphic Change**
Organisational levels	Hypothesis A-1: *The greater the dependence of an organization on another organization, the more similar it will become to that organization in structure, climate, and behavioral focus.*	Coercive
	Hypothesis A-2: *The greater the centralization of organization A's resource supply, the greater the extent to which organization A will change isomorphically to resemble the organizations on which it depends for resources.*	Coercive
	Hypothesis A-3: *The more uncertain the relationship between means and ends the greater the extent to which an organization will model itself after organizations it perceives to be successful.*	Mimetic
	Hypothesis A-4: *The more ambiguous the goals of an organization, the greater the extent to which the organization will model itself after organizations that it perceives to be successful.*	Mimetic
	Hypothesis A-5: *The greater the reliance on academic credentials in choosing managerial and staff personnel, the greater the extent to which an organization will become like other organizations in its field.*	Normative
	Hypothesis A-6: *The greater the participation of organizational managers in trade and professional associations, the more likely the organization will be, or will become, like other organizations in its field.*	Normative
Field	Hypothesis B-1: *The greater the extent to which an organizational field is dependent upon a single (or several similar) source of support for vital resources, the higher the level of isomorphism.*	Coercive
	Hypothesis B-2: *The greater the extent to which the organizations in a field transact with agencies of the state, the greater the extent of isomorphism in the field as a whole.*	Coercive
	Hypothesis B-3: *The fewer the number of visible alternative organizational models in a field, the faster the rate of isomorphism in that field.*	Mimetic
	Hypothesis B-4: *The greater the extent to which technologies are uncertain or goals are ambiguous within a field, the greater the rate of isomorphic change.*	Mimetic
	Hypothesis B-5: *The greater the extent of professionalization in a field, the greater the amount of institutional isomorphic change.*	Normative
	Hypothesis B-6: *The greater the extent of structuration of a field, the greater the degree of isomorphics.*	Normative

* From DiMaggio and Powell's *The Iron Cage Revisited: Institutional Isomorphism and Collective Rationality in Organizational Fields,* 1983, p. 154-156.

Appendix C

Figure 4 - Structure of the Corporate Sustainability Assessment



Source: RobecoSAM

Appendix D

Figure 5 - Example of Scoring Questions in the Corporate Sustainability Assessment

Example 2: Banks

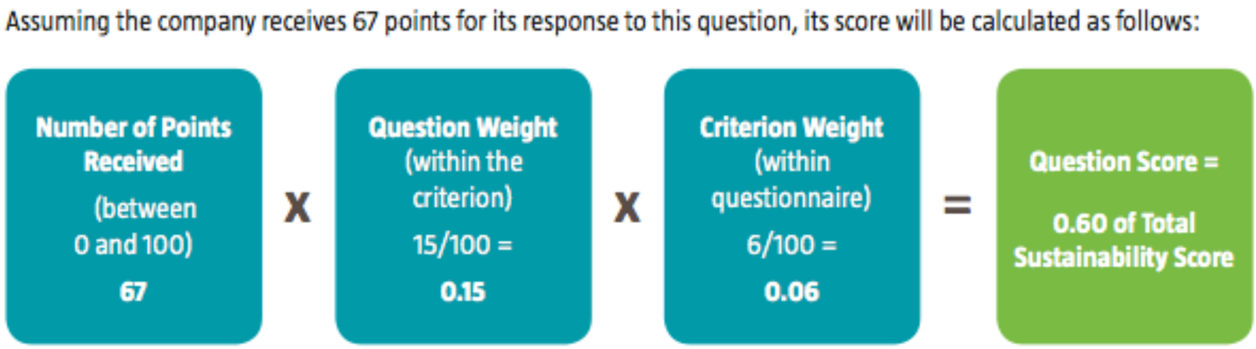
Question: Customer Data Security & Data Privacy	**Which of the following qualitative and assurance aspects does your company's on-line financial service/system platform cover? Please provide supporting documents.**
Question Points	0 – 100
Question weight within criterion	15%
Criterion	Customer Relationship Management
Dimension	Economic
RobecoSAM Rationale	New lifestyles such as flexible working hours, increased mobility, and working from home are shifting consumer attitudes towards online services. By adopting a multi-channel strategy that includes online services, companies can further enhance their product offerings, service availability and standardization while improving customer loyalty and lowering costs. RobecoSAM assesses what type of online services banks offer their customers. Networked data and globalized corporate activities require the diligent handling of information. Therefore, not only must companies have a comprehensive (online) privacy policy in place, they must also have the mechanisms to ensure the proper implementation of their policy. Over the past decade, the number of data breaches has grown exponentially. Therefore, RobecoSAM's question asks companies if they have the necessary security systems in place and the ability to evaluate potential costs associated with such data breaches.

Possible Answers	Number of Points Awarded
A) list of potential approaches (company can check all that apply)	0 – 100 (depending on which approaches have been selected)
B) not applicable	A question that has been marked "Not Applicable" will not be scored and the weight of the question will be equally redistributed across the other questions within the same criterion, only if the analyst agrees that the question does not apply to the company's business model. This option is only granted in exceptional cases.
C) not known	0

Source: RobecoSAM

Appendix E

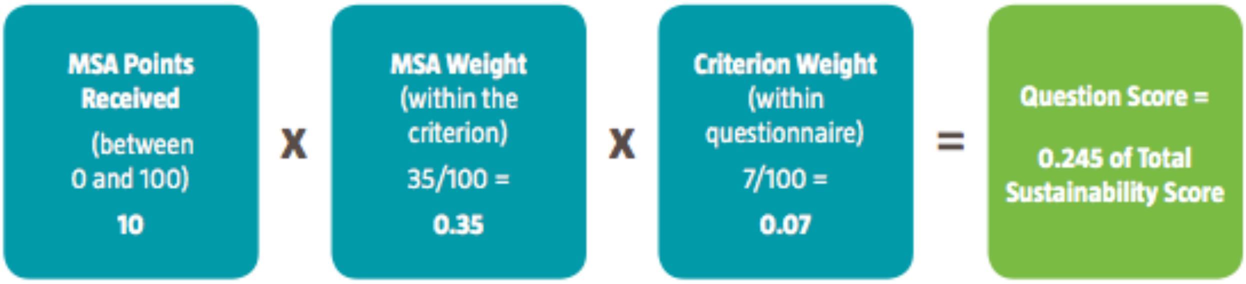
Figure 6 – Question Score Calculation in the Corporate Sustainability Assessment



Source: RobecoSAM

Appendix F

Figure 7 - Calculation of MSA Score in the Corporate Sustainability Assessment



Source: RobecoSAM

Appendix H

Table 22 – Overview of relationship between the SDGs, their Business Themes and selected G4 indicators for the Analysis

SDG	Business Theme	GRI Indicators
SDG 1. End poverty in all its forms everywhere	Access to financial services	FS6, FS7, FS13, FS14, former FS16
	Access to land	G4-SO2
	Availability of products and services for those on low income	G4-EC8
	Earnings, wages and benefits	G4-EC5
	Economic development in areas of high poverty	G4-EC8
	Economic Inclusion	G4-DMA-b Guidance for Procurement Practices
SDG 9. Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation	Access to financial services	FS6, FS7
	Environmental investments	G4-EN31
	Infrastructure investments	G4-EC1, G4-EC7
	Research and development	G4-EC1, G4-EN31
SDG 10. Reduce inequality within and among countries	Access to financial services	FS7, FS13, FS14, former FS16
	Economic development in areas of high poverty	G4-EC8
	Equal remuneration for women and men	G4-LA13
	Foreign direct investment	G4-EC8
	Responsible finance	FS10, FS11
SDG 11. Make cities and human settlements, safe, resilient and sustainable	Access to affordable	FS7
	Infrastructure investments	G4-EC7
	Sustainable transportation	G4-EN30
SDG 13. Take urgent action to combat climate change and its impacts*	GHG emissions	G4-EN15, G4-EN16, G4-EN17

Appendix I

Table 23 – Materiality at Indicator level for Bankia and European Investment Bank

Dimension	Indicator		Bankia	The European Investment	Total By Indicators		
			Material	Material	Yes	No	Unknown
Financial Services	FS6	-	Yes	Yes	2	0	0
	FS7	-	Yes	Yes	2	0	0
	FS10	-	Yes	Yes	2	0	0
	FS11	-	Yes	Yes	2	0	0
	FS13	-	Yes	Yes	2	0	0
	FS14	-	Yes	Yes	2	0	0
	Former FS16	-	Yes	No	1	1	0
Economic	G4-EC1	-	Yes	Yes	2	0	0
	G4-EC5	-	Yes	No	1	1	0
	G4-EC6	-	Yes	No	1	1	0
	G4-EC7	-	Yes	Yes	2	0	0
	G4-EC8	-	Yes	Yes	2	0	0
	G4-DMA-b Guidance for Procuremen t Practices	-	Unknown	No	0	1	1
Environmental	G4-EN15	-	Yes	No	1	1	0
	G4-EN16	-	Yes	No	1	1	0
	G4-EN17	-	Yes	No	1	1	0
	G4-EN30	-	Yes	No	1	1	0
	G4-EN31	-	Yes	No	1	1	0
Social / Labour	G4-LA13	-	Yes	No	1	1	0
Social/Society	G4-SO2	-	No	Yes	1	1	0
Total by bank	Yes	-	18	10			
	No	-	1	10			
	Unknown	-	1	0			

In this figure, the information about materiality from the 2015 reports is included, as it is identical to the table for 2014 with the difference of indicator FS16.

Appendix J

Information Level pr. Indicator - Reporting of Banks in Reporting Year 2014

Sources: Appendix L, Appendix N, Appendix P, Appendix R, Appendix T, Appendix V

Indicator: G4-EC1	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
a.	Partially	Partially	Complete	Partially	Partially	In G4 Index, not in report
b.	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report

Indicator: G4-EC5	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
a.	Not	Not	Partially	Not	Not	In G4 Index, not in report
b.	Not	Not	In G4 Index, not in report	Not	Not	In G4 Index, not in report
c.	Not	Not	In G4 Index, not in report	Not	Not	In G4 Index, not in report

Indicator: G4-EC6	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
a.	Complete	Not	In G4 Index, not in report	Not	Not	In G4 Index, not in report
b.	In G4 Index, not in report	Not	In G4 Index, not in report	Not	Not	In G4 Index, not in report
c.	In G4 Index, not in report	Not	In G4 Index, not in report	Not	Not	In G4 Index, not in report
d.	In G4 Index, not in report	Not	In G4 Index, not in report	Not	Not	In G4 Index, not in report

Indicator: G4-EC7	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
a.	Partially	Partially	Partially	Partially	Partially	Partially
b.	Partially	In G4 Index, not in report	Partially	Complete	Partially	Complete
c.	In G4 Index, not in report	In G4 Index, not in report	Partially	Complete	Complete	Complete

Indicator: G4-EC8	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
a.	In G4 Index, not in report	Partially	Partially	In G4 Index, not in report	Partially	In G4 Index, not in report
b.	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report

Indicator: G4-DMA-b Guidance for Procurement Practices	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
-	Not	Not	Not	Not	Not	In G4 Index, not in report

Indicator: G4-EN15	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
a.	Complete	Complete	Complete	Partially	Complete	In G4 Index, not in report
b.	Complete	Complete	Complete	Complete	Complete	In G4 Index, not in report
c.	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report
d.	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report
e.	Partially	Partially	In G4 Index, not in report	Partially	Partially	In G4 Index, not in report
f.	Complete	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report
g.	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report

Indicator: G4-EN16	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
a.	Complete	Complete	Complete	Partially	Complete	In G4 Index, not in report
b.	Complete	Complete	Complete	Complete	Complete	In G4 Index, not in report
c.	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report
d.	In G4 Index, not in report	Partially	In G4 Index, not in report	Partially	Partially	In G4 Index, not in report
e.	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report
f.	In G4 Index,	In G4 Index,	In G4 Index, not	In G4 Index,	In G4 Index,	In G4 Index,

	not in report	not in report	in report	not in report	not in report	not in report

Indicator: G4-EN17	**Bankia**	**Credit Suisse**	**Grupo Cooperativo Cajamar**	**ING Group**	**RZB Group**	**European Investment Bank**
a.	Complete	Complete	Complete	Partially	Complete	In G4 Index, not in report
b.	Complete	Complete	Complete	Complete	Complete	In G4 Index, not in report
c.	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report
d.	Complete	In G4 Index, not in report	Partially	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report
e.	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report
f.	Partially	Partially	In G4 Index, not in report	Partially	Partially	In G4 Index, not in report
g.	Partially	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report

Indicator: G4-EN30	**Bankia**	**Credit Suisse**	**Grupo Cooperativo Cajamar**	**ING Group**	**RZB Group**	**European Investment Bank**
a.	Complete	Complete	Complete	Not	In G4 Index, not in report	Not
b.	Complete	Complete	Complete	Not	Complete	Not
c.	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	Not	In G4 Index, not in report	Not

Indicator: G4-EN31	**Bankia**	**Credit Suisse**	**Grupo Cooperativo Cajamar**	**ING Group**	**RZB Group**	**European Investment Bank**
a.	Partially	Not	Partially	Not	Not	Not

Indicator: G4-LA13	**Bankia**	**Credit Suisse**	**Grupo Cooperativo Cajamar**	**ING Group**	**RZB Group**	**European Investment Bank**
a.	Not	Not	Partially	In G4 Index, not in report	Not	In G4 Index, not in report
b.	Not	Not	In G4 Index, not in report	In G4 Index, not in report	Not	In G4 Index, not in report

Indicator: G4-SO2	**Bankia**	**Credit Suisse**	**Grupo Cooperativo Cajamar**	**ING Group**	**RZB Group**	**European Investment Bank**
a.	Complete	Not	In G4 Index, not in report	Not	Not	Not

Indicator: FS6	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
-	In G4 Index, not in report	In G4 Index, not in report	Partially	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report

Indicator: FS7	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
-	Partially	Partially	In G4 Index, not in report	In G4 Index, not in report	Partially	Not

Indicator: FS10	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
-	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	Not	Not	Not

Indicator: FS11	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
-	In G4 Index, not in report	In G4 Index, not in report	Partially	Not	Partially	Not

Indicator: FS13	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
-	Partially	Not	Partially	Not	Not	Not

Indicator: FS14	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
-	In G4 Index, not in report	Not	Partially	Not	Partially	In G4 Index, not in report

Indicator: Former FS16	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
-	Not	Partially	Not	Not	Partially	Not

Appendix K

Information level pr. Indicator - Reporting of Banks in Reporting Year 2015
Sources: Appendix M, Appendix O, Appendix Q, Appendix S, Appendix U, Appendix W

Indicator: G4-EC1	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
a.	Partially	Partially	Partially	Partially	Partially	Partially
b.	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report

Indicator: G4-EC5	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
a.	Not	Not	Partially	Not	Not	In G4 Index, not in report
b.	Not	Not	In G4 Index, not in report	Not	Not	In G4 Index, not in report
c.	Not	Not	In G4 Index, not in report	Not	Not	In G4 Index, not in report

Indicator: G4-EC6	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
a.	Complete	Not	In G4 Index, not in report	Not	Not	In G4 Index, not in report
b.	In G4 Index, not in report	Not	In G4 Index, not in report	Not	Not	In G4 Index, not in report
c.	In G4 Index, not in report	Not	In G4 Index, not in report	Not	Not	In G4 Index, not in report
d.	In G4 Index, not in report	Not	In G4 Index, not in report	Not	Not	In G4 Index, not in report

Indicator: G4-EC7	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
a.	Partially	Partially	In G4 Index, not in report	Partially	Partially	Partially
b.	Partially	Partially	In G4 Index, not in report	Partially	Partially	Partially
c.	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	Complete	Complete	Complete

Indicator: G4-EC8	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
a.	Partially	Partially	Partially	Partially	In G4 Index, not in report	In G4 Index, not in report
b.	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report

Indicator: G4-DMA-b Guidance for Procurement Practices	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
-	Not	Not	Partially	Not	Not	In G4 Index, not in report

Indicator: G4-EN15	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
a.	Complete	Complete	Complete	Partially	Complete	In G4 Index, not in report
b.	Complete	Complete	Complete	Complete	Complete	In G4 Index, not in report
c.	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report
d.	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	Partially	Partially	In G4 Index, not in report
e.	Partially	Partially	In G4 Index, not in report	Partially	Partially	In G4 Index, not in report
f.	Complete	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report
g.	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report

Indicator: G4-EN16	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
a.	Complete	Complete	Complete	Partially	Complete	In G4 Index, not in report
b.	Complete	Complete	Complete	Complete	Complete	In G4 Index, not in report
c.	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	Partially	Partially	In G4 Index, not in report
d.	In G4 Index, not in report	Partially	In G4 Index, not in report	Complete	Partially	In G4 Index, not in report
e.	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	Partially	In G4 Index, not in report	In G4 Index, not in report
f.	In G4 Index,	In G4 Index,	In G4 Index, not	In G4 Index,	In G4 Index,	In G4 Index,

	not in report	not in report	in report	not in report	not in report	not in report

Indicator: G4-EN17	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
a.	Complete	Complete	Complete	Partially	Complete	In G4 Index, not in report
b.	Complete	Complete	Complete	Complete	Complete	In G4 Index, not in report
c.	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report
d.	Complete	In G4 Index, not in report	Partially	Partially	Partially	In G4 Index, not in report
e.	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	Partially	Partially	In G4 Index, not in report
f.	Partially	Partially	In G4 Index, not in report	Partially	Partially	In G4 Index, not in report
g.	Complete	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report

Indicator: G4-EN30	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
a.	Complete	Complete	Complete	Not	Complete	Not
b.	Complete	Complete	In G4 Index, not in report	Not	Complete	Not
c.	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	Not	In G4 Index, not in report	Not

Indicator: G4-EN31	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
a.	Partially	Not	Not	Not	Not	Not

Indicator: G4-LA13	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
a.	Not	Not	Partially	In G4 Index, not in report	Not	In G4 Index, not in report
b.	Not	Not	In G4 Index, not in report	In G4 Index, not in report	Not	In G4 Index, not in report

Indicator: G4-SO2	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
a.	Complete	Not	Partially	Not	Not	Not

Indicator: FS6	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
-	In G4 Index, not in report	In G4 Index, not in report	Not	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report

Indicator: FS7	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
-	Partially	Partially	Partially	Partially	In G4 Index, not in report	Not

Indicator: FS10	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
-	In G4 Index, not in report	In G4 Index, not in report	In G4 Index, not in report	Not	Not	Not

Indicator: FS11	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
-	In G4 Index, not in report	In G4 Index, not in report	Partially	Not	Partially	Not

Indicator: FS13	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
-	Partially	Not	Not	Not	Not	Not

Indicator: FS14	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
-	In G4 Index, not in report	Not	Not	Not	Partially	In G4 Index, not in report

Indicator: Former FS16	Bankia	Credit Suisse	Grupo Cooperativo Cajamar	ING Group	RZB Group	European Investment Bank
-	Not	In G4 Index, not in report	Partially	Not	Partially	Not

Appendix L

Bankia – Information Reported on the 20 Indicators, Reporting Year 2014

Indicator: G4-EC1	Level of information	Content
a.	Partially	Direct economic value generated (4,087,144) * Gross income: 4,008,812 *Net profit/(loss) of discontinued operations: 85,328 * Gains/(losses) on disposal of assets not classified as non-current assets held for sale: -6,996 Economic Value distributed (2,013,695) * Dividends: 201,553 * Other administrative expenses: 538,590 * Staff costs: 987,320 * Income and other tax: 286,232 Economic value retained (2,073,449).
b.	In G4 Index, not in report	-

Indicator: G4-EC5	Level of information	Content
a.	Not	According to the collective agreement, basic salaries are only broken down by professional category
b.	Not	-
c.	Not	-

Indicator: G4-EC6	Level of information	Content
a.	Complete	100% of senior management are Spanish Corporate governance sub-chapter.
b.	In G4 Index, not in report	-
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	-

Indicator: G4-EC7	Level of information	Content
a.	Partially	13,975,539 million euro: 30% education 26% Local and rural development Employment 11% Sponsorship 11% Disabled people 10% Volunteers employees' projects 10% Emerging poverty/housing 2%
b.	Partially	Employment: 1,332 customers joined employment program, 842 joined and 191 found a job - success rate of 22%
c.	In G4 Index, not in report	-

Indicator: G4-EC8	Level of information	Content
a.	In G4 Index, not in report	1. Total social housing rentals in 2014: 654 2.9,369,774.35 million euros for supporting children’s education 3. 3,586 certified suppliers, 1,551 are active suppliers, 95.74% are local Not the required information.
b.	In G4 Index, not in report	-

Indicator: G4-DMA-b Guidance for Procurement Practices	Level of information	Content
-	Not	-

Indicator: G4-EN15	Level of information	Content
a.	Complete	3,348.1 tonnes of CO2 scope 1 emissions. 662.8 tonnes from natural gas consumption 346.5 tonnes from fuel consumption 2,338.8 tonnes from refrigerant gas recharging.
b.	Complete	Only CO2 for scope 1 is reported. Nox emissions are reported under other emissions, but not categorised by scope.
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	Not reported - latest year 2013, but not reported directly as base year. 4-22 the Scope 1 emissions relating to 2013 have been recalculated taking into account the global warming potentials for 100 years published in the Fifth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC) (2013). National Markets and Competition Commission.
e.	Partially	Sources of emissions factors used: IPCC 2006/2013, CORINAIR 2007, U.S. EPA, Spain – GHG Inventory Report 1990-2012 (2014), DEFRA 2014, Guide for calculating HGH emissions (2014) – Catalan Office for Climate Change, Environmental Paper Network (2012) and Carbon Impact Studies: Toner Refills at Cartridge World – Comparative Carbon Footprints (2008). 4-22 the Scope 1 emissions relating to 2013 have been recalculated taking into account the global warming potentials for 100 years published in the Fifth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC) (2013). National Markets and Competition Commission.
f.	Complete	Sources of emissions factors used: IPCC 2006/2013, CORINAIR 2007, U.S. EPA, Spain – GHG Inventory Report 1990-2012 (2014), DEFRA 2014, Guide for calculating HGH emissions (2014) – Catalan Office for Climate Change, Environmental Paper Network (2012) and Carbon Impact Studies: Toner Refills at Cartridge World – Comparative Carbon Footprints (2008). 4-22 the Scope 1 emissions relating to 2013 have been recalculated taking into account the global warming potentials for 100 years published in the Fifth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC) (2013). National Markets and Competition Commission.
g.	In G4 Index, not in report	-

Indicator: G4-EN16	Level of information	Content
a.	Complete	0 tonnes. 100% of the electricity acquired was generated by renewable energy sources (green energy). This has prevented the emission of 36,905.1 tonnes of CO2. Source: Electricity Labelling and Source Guarantee System (2013). National Markets and Competition Commission.
b.	Complete	Only CO2 for scope 2 is reported. Nox emissions are reported under other emissions, but not categorised by scope.
c.	In G4 Index, not in report	Not reported - latest year 2013, but not reported directly as base year.
d.	In G4 Index, not in report	Not reported for scope 2.
e.	In G4 Index, not in report	Not reported for scope 2.
f.	In G4 Index, not in report	Not reported for scope 2.

Indicator: G4-EN17	Level of information	Content
a.	Complete	Total scope 3 emissions: 4,672.7 tonnes.
b.	Complete	Only CO2 for scope 3 is reported.
c.	In G4 Index, not in report	-
d.	Complete	Business trips: 3,281.0 tonnes. Travel (omnibus shuttle service): 249.1 tonnes. Travel (shared transport): 9.2 tonnes. Paper consumption (DINA4) and printer cartridges: 1,089.0 tonnes. Water consumption: 25.2 tonnes. Waste management: 19.2 tonnes.
e.	In G4 Index, not in report	Not reported - latest year 2013, but not reported directly as base year.
f.	Partially	Sources of emissions factors used: IPCC 2006/2013, CORINAIR 2007, U.S. EPA, Spain – GHG Inventory Report 1990-2012 (2014), DEFRA 2014, Guide for calculating HGH emissions (2014) – Catalan Office for Climate Change, Environmental Paper Network (2012) and Carbon Impact Studies: Toner Refills at Cartridge World – Comparative Carbon Footprints (2008).
g.	Partially	Sources of emissions factors used: IPCC 2006/2013, CORINAIR 2007, U.S. EPA, Spain – GHG Inventory Report 1990-2012 (2014), DEFRA 2014, Guide for calculating HGH emissions (2014) – Catalan Office for Climate Change, Environmental Paper Network (2012) and Carbon Impact Studies: Toner Refills at Cartridge World – Comparative Carbon Footprints (2008).

Indicator: G4-EN30	Level of information	Content
a.	Complete	1. Indirect CO2e emissions from business trips 3,281.0 tonnes 2. Indirect CO2e emissions from travel (Ofibus shuttle service) 249.1 tonnes 3. Indirect CO2e emissions from travel (shared transport) 9.2 tonnes
b.	Complete	The use of audio-conferencing and multi-videoconferencing facilities as an alternative to business travel continued to be promoted in 2014 to minimise fuel consumption and reduce the polluting emissions associated with transport
c.	In G4 Index, not in report	-

Indicator: G4-EN31	Level of information	Content
a.	Partially	10 million euros over the next five years This investment will be used, among other measures, to implement smart metering in offices and for IT equipment; renew air conditioning equipment; and to carry out internal awareness campaigns.

Indicator: G4-LA13	Level of information	Content
a.	Not	According to the collective agreement, basic salaries are only broken down by professional category
b.	Not	-

Indicator: G4-SO2	Level of information	Content
a.	Complete	No significant impacts on local communities have been detected.

Indicator: FS6	Level of information	Content
-	In G4 Index, not in report	16,000 portfolio-assigned SME customers Retail customers Payment methods Financing Consumer credit Insurance Asset management Services Not the required information.

Indicator: FS7	Level of information	Content
-	Partially	Down Syndromes Cards for independent contractors, retailers and SMEs and business - percentage of net profits to Down Syndrome Foundations from card-use and fees NGO cards for private individuals - by using these cards, the cardholder can donate a percentage of net profit from the use of the card to associations and foundations Remittances Immigrants for immigrants and private individuals and Aquí-Allá Card for private individuals and immigrants - possibility to send money to family in home country. NGO transfer for natural and legal persons - free transfer to specific charitable-social entities

Indicator: FS10	Level of information	Content
-	In G4 Index, not in report	-

Indicator: FS11	Level of information	Content
-	In G4 Index, not in report	-

Indicator: FS13	Level of information	Content
-	Partially	Branches: 288 ATMs: 587

Indicator: FS14	Level of information	Content
-	In G4 Index, not in report	-

Indicator: Former FS16	Level of information	Content
-	Not	-

Appendix M

Bankia – Information Reported on the 20 Indicators, Reporting Year 2015

Indicator: G4-EC1	Level of information	Content
a.	Partially	Economic Value Generated: 3,843,119 euros Economic Value distributed: 2,204,876 Economic Value retained 1,638,243 "Calculation: Step 1. Gross Income: 3,806,183 + Net profit/(loss) of discontinued operations: 0 + Gains/(losses) on disposal of assets not classified as non-current assets held for sale: 36,936 = Economic Value Generated 3,843,119. Step 2. Dividend: 302,330 + Other administrative expenses: 481,126 + staff costs: 970,507 + Income and other taxes: 450,913 = Economic Value Distributed: 2,204,876. Step 3. Economic Value Generated: 3,843,119 - Economic Value distributed: 2,204,876 = Economic Value Retained: 1,638,243."
b.	In G4 Index, not in report	-

Indicator: G4-EC5	Level of information	Content
a.	Not	According to the collective agreement, basic salaries are only broken down by professional category
b.	Not	-
c.	Not	-

Indicator: G4-EC6	Level of information	Content
a.	Complete	100% of senior management are Spanish. Subchapter Corporate Governance
b.	In G4 Index, not in report	-
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	-

Indicator: G4-EC7	Level of information	Content
a.	Partially	Housing and emerging poverty: provides a form to apply for social housing. Education: offering a higher diploma in Business administration and finance at Bankia training centres. Involved in other training. Employment support plan, offered to unemployed customers, a course on job search with a training itenary.
b.	Partially	Current effect from employment support plan: 45% of 898 participants found

		work.
c.	In G4 Index, not in report	-

Indicator: G4-EC8	**Level of information**	**Content**
a.	Partially	Jobs supported in the supply chain: 448 active SME suppliers, 2,799 active total suppliers.
b.	In G4 Index, not in report	-

Indicator: G4-DMA-b Guidance for Procurement Practices	**Level of information**	**Content**
-	Not	-

Indicator: G4-EN15	**Level of information**	**Content**
a.	Complete	Total scope 1 emissions 3,632.28 tonnes.
b.	Complete	Only CO2 is reported in scope 1 - NOX emissions are reported under other emission 1.55 tonnes, but not by scope.
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	A base year is not reported.
e.	Partially	Sources of emissions factors used: IPCC 2006/2013, CORINAIR 2007, US. US. EPS, Spain – GHG Inventory Report 1990-2013 (2015), DEFRA 2015, Guide for calculating GHG emissions (2014) – Catalan Office for Climate Change Environmental Paper Network (2012) and Carbon Impact Studies: Toner Refills at Cartridge World – Comparative Carbon Footprints (2208).
f.	Complete	Sources of emissions factors used: IPCC 2006/2013, CORINAIR 2007, US. US. EPS, Spain – GHG Inventory Report 1990-2013 (2015), DEFRA 2015, Guide for calculating GHG emissions (2014) – Catalan Office for Climate Change Environmental Paper Network (2012) and Carbon Impact Studies: Toner Refills at Cartridge World – Comparative Carbon Footprints (2208). Global warming potentials for 100 years published in the Fifth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC) (2013) have been considered.
g.	In G4 Index, not in report	-

Indicator: G4-EN16	**Level of information**	**Content**
a.	Complete	0 tonnes. Footnote to section - 100 % of the electricity acquired was generated by renewable energy sources (green energy). This has prevented the emission of 39,018.3 tonnes of CO2. Source: Electricity Labelling and Source Guarantee

		(2014). National Markets and Competition Commission.
b.	Complete	Only CO2 is reported in scope 1 - NOX emissions are reported under other emission 1.55 tonnes, but not by scope.
c.	In G4 Index, not in report	A base year is not reported.
d.	In G4 Index, not in report	-
e.	In G4 Index, not in report	-
f.	In G4 Index, not in report	-

Indicator: G4-EN17	Level of information	Content
a.	Complete	Total scope 3 emissions: 5,004.83 tonnes.
b.	Complete	Only CO2 is reported in scope 3 - NOX emissions are reported under other emission 1.55 tonnes (not categorised by scope).
c.	In G4 Index, not in report	-
d.	Complete	* Business trips * Commutes (Ofibus shuttle service). * commutes (shared transport). *consumption of paper (DIN A4) and printer cartridges. * Water consumption * Waste management
e.	In G4 Index, not in report	A base year is not reported.
f.	Partially	Sources of emissions factors used: IPCC 2006/2013, CORINAIR 2007, US. US. EPS, Spain – GHG Inventory Report 1990-2013 (2015), DEFRA 2015, Guide for calculating GHG emissions (2014) – Catalan Office for Climate Change Environmental Paper Network (2012) and Carbon Impact Studies: Toner Refills at Cartridge World – Comparative Carbon Footprints (2208).
g.	Complete	Sources of emissions factors used: IPCC 2006/2013, CORINAIR 2007, US. US. EPS, Spain – GHG Inventory Report 1990-2013 (2015), DEFRA 2015, Guide for calculating GHG emissions (2014) – Catalan Office for Climate Change Environmental Paper Network (2012) and Carbon Impact Studies: Toner Refills at Cartridge World – Comparative Carbon Footprints (2208). Global warming potentials for 100 years published in the Fifth Assessment Report of the Intergovernmental Panel on Climate Change (IPCC) (2013) have been considered.

Indicator: G4-EN30	Level of information	Content
a.	Complete	Indirect CO2 emissions from: Business Trips: 3,315 commutes (ofibus shuttle service): 325 commutes (shared transports): 9.2
b.	Complete	The use of audio-conferencing and multi-videoconferencing is encouraged to reduce fuel consumption.

c.	In G4 Index, not in report	-

Indicator: G4-EN31	Level of information	Content
a.	Partially	10 million in energy efficiency plan: on, amongst other, remote energy management systems, IT equipment, renew air-conditioning, and carry out internal awareness campaigns.

Indicator: G4-LA13	Level of information	Content
a.	Not	According to the collective agreement, basic salaries are only broken down by professional category
b.	Not	-

Indicator: G4-SO2	Level of information	Content
a.	Complete	No significant impacts on local communities have been detected.

Indicator: FS6	Level of information	Content
-	In G4 Index, not in report	Market shares: Retail branches: 8.9% Consumer loans: 10.45% Business loans: 14.0% Debit cards: 12.2%. Life Insurance: 5.1% Pension Plans: 6.6% Investment Funds: 5.44% Business Lines: Retail banking (private banking, personal banking, universal banking & SMEs and independent contractors with a turnover less than 6 million euros) Bancassurance Asset Management (Bankia Fondos, Bankia pensiones) Real-Estate Assets Business Banking (Corporate Banking, Business with turnover exceeding 6 million euros) Not the required information

Indicator: FS7	Level of information	Content
-	Partially	* Migrant remittances for immigrants - family aid remittances to the countries of origin * NGO Cards - credit or debit card where the holder contributes a percentage

		of the net profit from the use of the card in retail establishments to associations and foundations affiliated with the NGO programme * Fundación Síndrome de Down - a solidarity card where Bankia pays a percentage of the fee revenue to Fundación Síndrome de Down de Madrid. Paralimpics card - small percentage of profits from card use in retail establishment so that individuals and business collaborate wit the Spanish Paralympic Committee and sports federation at no additional cost Aquí-Allá debit and prepaid card for immigrants - remittance solutions and facilities to immigrants who want to transfer money to relatives in other countries Pioneer Funds - Global Ecology - investment in securities that are involved exclusively in sustainable development Employer plans - investment according to ESG criteria - at 1.017 BN euros (61% of assets managed in employer pension plans). NGO credit transfers - free credit transfers to specified NGOs. Total social investment 16.20 MN euros

Indicator: FS10	**Level of information**	**Content**
-	In G4 Index, not in report	-

Indicator: FS11	**Level of information**	**Content**
-	In G4 Index, not in report	Environmental risk: Very low - 15.7% (obligors[O]) 39.5% (drawn exposure [DE]) Low - 63.0% (O) 35.3% (DE) Medium - 19.7% (O) 22.8% (DE) High - 1.6% (O) 2.4% (DE).

Indicator: FS13	**Level of information**	**Content**
-	Partially	Number of ATMs in less populated areas: 607 Number of branches in less populated areas: 284

Indicator: FS14	**Level of information**	**Content**
-	In G4 Index, not in report	-

Indicator: Former FS16	**Level of information**	**Content**
-	Not	-

Appendix N

Credit Suisse – Information Reported on the 20 Indicators, Reporting Year 2014

Indicator: G4-EC1	Level of information	Content
a.	Partially	Economic Value Generated in CHF million: Net revenues: 26,242 Economic Value distributed in CHF Million: Dividends paid: 1,252 Compensation and benefits: 11,334 Income tax expense 1,405
b.	In G4 Index, not in report	-

Indicator: G4-EC5	Level of information	Content
a.	Not	-
b.	Not	-
c.	Not	-

Indicator: G4-EC6	Level of information	Content
a.	Not	-
b.	Not	-
c.	Not	-
d.	Not	-

Indicator: G4-EC7	Level of information	Content
a.	Partially	*Microfinance Capacity Building Initiative - driver further market development and innovation by strengthening the ability of microfinance institutions. *Sustainable real estate - 41 billion of assets under management and a portfolio of around 1,300 properties across 20 countries, sustainability is regarded as an essential requirement when managing and developing its real estate holdings. *Global citizens programme - credit suisse employees share expertise with education and microfinance partners around the world.
b.	In G4 Index, not in report	-
c.	In G4 Index, not in report	-

Indicator: G4-EC8	Level of information	Content
a.	Partially	Credit Suisse makes a direct contribution to the economy in their role as a financial intermediary, bringing together lenders and borrowers of capital around the world. Credit Suisse also recognises that they have a responsibility to help build a more robust banking system and solid financial infrastructure. Microfinance by providing small or very small loans and other financial services to microenterprises and low-income households in developing countries and emerging economies.
b.	In G4 Index, not in report	-

Indicator: G4-DMA-b Guidance for Procurement Practices	Level of information	Content
-	Not	-

Indicator: G4-EN15	Level of information	Content
a.	Complete	17,270 metric tons were direct emissions (Scope 1)
b.	Complete	Only CO2 is reported.
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	2013 and 2014 figures are the base for the GHG neutrality - not general base year.
e.	Partially	For details on the methodology applied calculating our GHG emissions 2014 see Credit Suisse CDP reporting 2014 (www.cdp.net) in chapter CC7.
f.	In G4 Index, not in report	-
g.	In G4 Index, not in report	-

Indicator: G4-EN16	Level of information	Content
a.	Complete	116,140 metric tons were indirect emissions (Scope 2)
b.	Complete	Only CO2 is reported.
c.	In G4 Index, not in report	2013 and 2014 figures are the base for the GHG neutrality - not general base year.
d.	Partially	For details on the methodology applied calculating our GHG emissions 2014 see Credit Suisse CDP reporting 2014 (www.cdp.net) in chapter CC7.
e.	In G4 Index, not in report	-
f.	In G4 Index, not in report	-

Indicator: G4-EN17	Level of information	Content
a.	Complete	Credit Suisse’s other indirect GHG emissions (Scope 3) were 111,520 metric tons (measured in CO2 equivalents).
b.	Complete	Only CO2 is reported.
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	-
e.	In G4 Index, not in report	2013 and 2014 figures are the base for the GHG neutrality - not general base year.
f.	Partially	For details on the methodology applied calculating our GHG emissions 2014 see Credit Suisse CDP reporting 2014 (www.cdp.net) in chapter CC7. For details on Scope 3 emissions see Credit Suisse CDP reporting 2014 in chapter CC14.1
g.	In G4 Index, not in report	-

Indicator: G4-EN30	Level of information	Content
a.	Complete	The primary source of Credit Suisse's environmental impact from transport is business travel. The total amount of GHG emissions from business travel (Scope 3) in 2014 was approx. 62,100 metric tons.
b.	Complete	Business travel poses a challenge for us as a global bank. While it is often essential to maintain direct contact with clients, business travel accounts for around 25% of our global greenhouse gas emissions. To reduce the number of business flights taken, we require employees to travel by train when covering shorter distances, and we encourage the use of telephone and video conferencing. As a result, the global use of specially equipped video conferencing rooms rose by 26% to 173,362 hours in 2014. In addition, the use of desktop video conferencing rose to 122,277 hours. In line with our strategy to achieve global greenhouse gas neutrality, we also purchase greenhouse gas neutral tickets for air travel that offset all the emissions from our international business travel through emissions reduction certificates (ERCs). In 2014, we offset around 56,000 metric tons of greenhouse gas emissions by purchasing this type of ticket. Commuting at a regional level also has an impact on the environment. New working models that enable our employees to work from home from time to time help reduce traffic-related emissions
c.	In G4 Index, not in report	-

Indicator: G4-EN31	Level of information	Content
a.	Not	-

Indicator: G4-LA13	Level of information	Content
a.	Not	Credit Suisse has standard entry-level salaries by division and region, applicable equally to men and women. Thereafter, salaries are influenced by numerous factors including relevant experience and performance, subject to local laws and regulations. When defining salaries, salary bands (where applicable) are used as reference, which are available in a job classification system, called JCS. Credit Suisse does not tolerate any form of discrimination, in particular based on ethnicity, nationality, gender, sexual orientation, gender identity, religion, age, marital or family status, pregnancy, disability or any other status that is protected as a matter of local law. All compensation decisions must be based on an individual's qualification, performance and behavior or other legitimate business considerations, and without regard to any of the protected characteristics listed above. Credit Suisse does not report on the ratio of basic salary of women to men by employee category, by significant locations of operation due to bank-specific regulatory limitations and internal guidelines.
b.	Not	-

Indicator: G4-SO2	Level of information	Content
a.	Not	-

Indicator: FS6	Level of information	Content
-	In G4 Index, not in report	-

Indicator: FS7	Level of information	Content
-	Partially	At the end of 2014, Credit Suisse’s volume of assets under management in the area of microfinance totalled over USD 2 billion Impact investment: SMEs and medium sized business across different sector who pursue social and/or environmental objectives. First Higher Education Note to provide an education to more than 500 students. The Nature Conservation note to support nature conservation and sustainable farming. Microfinance to support people at the base of the pyramid, a leader in microfinance and manages over 2 billion USD worth of assets. For example small farmers with no direct access to finance or to markets for their produce.

Indicator: FS10	Level of information	Content
-	In G4 Index, not in report	-

Indicator: FS11	Level of information	Content
-	In G4 Index, not in report	By end-2014, the total SRI Assets under Management - e.g. assets with a high social and/or environmental benefit, including topics such as sustainable real estate, microfinance and renewable energies, was CHF 8,974 million. The environmental and social criteria and the screening approach used in compiling this aggregate number differ depending on the product (e.g. best- in-class approach, positive/negative screening).

Indicator: FS13	Level of information	Content
-	Not	-

Indicator: FS14	Level of information	Content
-	Not	-

Indicator: Former FS16	Level of information	Content
-	Partially	Global Education Initiative - an initiative that focus on financial education for girls. Collaborates with Aflatoun, which specialises in the development of social and financial skills curricula and teaching methods. Aimed at 100,000 adolescent girls in Brazil, China, India and Rwanda and to enable them to have improved access to and transition through secondary school.

Appendix O

Credit Suisse – Information Reported on the 20 Indicators, Reporting Year 2015

Indicator: G4-EC1	Level of information	Content
a.	Partially	Economic Value Generated in CHF million: Net revenues: 23,797 Economic Value Distributed in CHF million: Compensations and benefits: 11,546 Income tax expense: 523. Dividends paid: (427).
b.	In G4 Index, not in report	-

Indicator: G4-EC5	Level of information	Content
a.	Not	-
b.	Not	-
c.	Not	-

Indicator: G4-EC6	Level of information	Content
a.	Not	-
b.	Not	-
c.	Not	-
d.	Not	-

Indicator: G4-EC7	Level of information	Content
a.	Partially	Sustainable Investment: Offers solutions that incorporate ESG criteria into the investment process. The Credit Suisse Real Estate Investment Management regards sustainability as an essential requirement when managing and developing its real estate holdings. Microfinance Capacity Building Initiative: contributes to market development by strengthening the ability of micro finance institutions to serve diverse financial needs at the bottom of the income pyramid. Global Citizens Program: suitably qualified employees share their expertise with education and microfinance partners.
b.	Partially	Microfinance - Over 300,000 people with access to new or improved products and services. Over 2,000 local employees of microfinance institutions trained.
c.	In G4 Index, not in report	-

Indicator: G4-EC8	Level of information	Content
a.	Partially	As a financial intermediary, Credit Suisse brings together borrowers and lenders together and by that supplying businesses with the capital they need to expand their activities and finance innovation, thus helping to drive economic growth and job creation.
b.	In G4 Index, not in report	-

Indicator: G4-DMA-b Guidance for Procurement Practices	Level of information	Content
-	Not	-

Indicator: G4-EN15	Level of information	Content
a.	Complete	16,630 (net) metric tons were direct emissions (Scope 1)
b.	Complete	Only CO2 is mentioned.
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	Figures from 2014 are the basis of Credit Suisse's voluntary GHG neutrality.
e.	Partially	For details on the methodology applied calculating our GHG emissions 2015 see Credit Suisse CDP reporting 2015 (www.cdp.net) in chapter CC7.
f.	In G4 Index, not in report	-
g.	In G4 Index, not in report	-

Indicator: G4-EN16	Level of information	Content
a.	Complete	110,320 (net) metric tons were indirect emissions (Scope 2)
b.	Complete	Only CO2 is mentioned.
c.	In G4 Index, not in report	Figures from 2014 are the basis of Credit Suisse's voluntary GHG neutrality.
d.	Partially	For details on the methodology applied calculating our GHG emissions 2015 see Credit Suisse CDP reporting 2015 (www.cdp.net) in chapter CC7.
e.	In G4 Index, not in report	-
f.	In G4 Index, not in report	-

Indicator: G4-EN17	Level of information	Content
a.	Complete	Credit Suisse’s other indirect GHG emissions (Scope 3) were 113,320 (net) metric tons (measured in CO2 equivalents)
b.	Complete	Only CO2 is mentioned.
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	Scope 3 is not defined in the report or GRI Content Index.
e.	In G4 Index, not in report	Figures from 2014 are the basis of Credit Suisse's voluntary GHG neutrality.
f.	Partially	For details on the methodology applied calculating our GHG emissions 2015 see Credit Suisse CDP reporting 2015 (www.cdp.net) in chapter CC7.
g.	In G4 Index, not in report	-

Indicator: G4-EN30	Level of information	Content
a.	Complete	The primary source of Credit Suisse's environmental impact from transport is business travel. The total amount of GHG emissions from business travel (Scope 3) in 2015 was approx. 67,200 metric tons.
b.	Complete	In our efforts to reduce our environmental footprint, business travel poses a challenge for us as a global financial institution. Since it is often essential to maintain direct contact with clients, business travel accounts for around 28% of our global greenhouse gas emissions. Employees are therefore encouraged to use telephone and video conferencing and to travel by train when covering shorter distances. Specially equipped video conferencing rooms were used globally for a total of 173,946 hours in 2015, while the use of desktop videoconferencing through the Lync application rose by 65% compared to 2014 to 186,818 hours. If air travel is essential, we purchase greenhouse gas neutral tickets that offset all the emissions from our international flights through emissions reduction certificates (ERCs). In 2015, we offset around 66,600 metric tons of greenhouse gas emissions in this way. New working models that enable our employees to work from home from time to time help to lower emissions from regional commuter traffic.
c.	In G4 Index, not in report	-

Indicator: G4-EN31	Level of information	Content
a.	Not	-

Indicator: G4-LA13	Level of information	Content
a.	Not	Credit Suisse has standard entry-level salaries by division and country, applicable equally to men and women. Thereafter, salaries are influenced by numerous factors including relevant experience and performance, subject to local laws and regulations. When defining salaries, salary bands (where applicable) are used as reference, which are available in a job classification system, called JCS. Credit Suisse does not tolerate any form of discrimination, in particular based on ethnicity, nationality, gender, sexual orientation, gender identity, religion, age, marital or family status, pregnancy, disability or any other status that is protected as a matter of local law. All compensation decisions must be based on an individual's qualification, performance and behavior or other legitimate business considerations, and without regard to any of the protected characteristics listed above. Credit Suisse does not report on the ratio of basic salary of women to men by employee category, by significant locations of operation due to bank-specific regulatory limitations and internal guidelines.
b.	Not	-

Indicator: G4-SO2	Level of information	Content
a.	Not	-

Indicator: FS6	Level of information	Content
-	In G4 Index, not in report	Swiss Universal Bank: 5,563 CHF million. Asia Pacific: 2,839 CHF million. Investment Banking Capital Markets: 1,752 CHF million. International Wealth Management: 4,394 CHF million. Global Markets: 7,391 CHF million. Strategic Resolution Unit: 413 CHF million.

Indicator: FS7	Level of information	Content
-	Partially	At the end of 2015, Credit Suisse's volume of assets under administration in the area of microfinance totalled over USD 2.8 billion.

Indicator: FS10	Level of information	Content
-	In G4 Index, not in report	Credit Suisse seeks to act in the interest of the beneficial owners; in the event of annual general meetings it therefore assesses the impact of the shareholder vote on the interests of the shareowners and exercises its voting right on substantial matters, including potential environmental and social topics.

Indicator: FS11	Level of information	Content
-	In G4 Index, not in report	As of year-end 2015, CHF 17,775 million is the amount of assets invested according to sustainability criteria. This category includes assets that meet sustainability and/or ESG (environmental, social and governance) criteria (incl. Positive and/or negative screening) and that consider social and/or environmental impact.

Indicator: FS13	Level of information	Content
-	Not	-

Indicator: FS14	Level of information	Content
-	Not	-

Indicator: Former FS16	Level of information	Content
-	In G4 Index, not in report	We regularly review the suitability and appropriateness of the advice we offer – testing and documenting the quality of our investment recommendations to assess whether our clients have the knowledge and experience to understand the associated risks.

Appendix P

Grupo Cooperativo Cajamar – Information Reported on the 20 Indicators, Reporting Year 2014

Indicator: G4-EC1	Level of information	Content
a.	Complete	Economic Value Generated: EUR 1,414,553 million. Revenues: EUR 1,186,076 million. Retired assets: EUR 222,270 million. Non-current assets earnings: EUR 6,207 million. Economic Value Distributed: EUR 508,533 million. Staff wage: EUR 341,958 million. Suppliers: EUR 154,340 million. Taxes: EUR (45,125) million Interest on contributions to capital from cooperatives: EUR 57,360 million. Community Investment (without foundations): EUR 0 million. Total Economic Value Distributed: EUR 525,329 million. Community Investment (Foundations): EUR 16,796 million. Economic Value Retained: EUR 889,224 million.
b.	In G4 Index, not in report	-

Indicator: G4-EC5	Level of information	Content
a.	Partially	Initial wage for entry-level employees: EUR 1,256.22 and minimum salary: EUR 645.30. Ratio of entry level to minimum: 1.95.
b.	In G4 Index, not in report	-
c.	In G4 Index, not in report	-

Indicator: G4-EC6	Level of information	Content
a.	In G4 Index, not in report	-
b.	In G4 Index, not in report	-
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	-

Indicator: G4-EC7	Level of information	Content

a.	Partially	For particularly vulnerable families, Grupo Cooperativo Cajamar has together with other Spanish banks and the Spanish government established a foundation for housing, offering accommodation to these families at low cost. GCC has contributed with 80 properties to the housing foundation. Financial solutions to families in risk of facing foreclosure. 11.962 transactions - amounts EUR 380.037 thousands. GCC has focused on keeping branches open in low-populated areas and not close branches in areas where they are the only one left. GCC puts emphasis on the availability to the newest financial products in these areas in order to contribute to a more equal society. In line with GCC's social commitment of development of rural areas. GCC's social and cultural centres all over Spain promoting cultural and sports event in order to support artistical development in the youngs, children and adults. The offering of financial products especially targeted at young people and women in the agricultural sector. (Young: EUR 31,704 thousands and women: EUR 2,922 thousands). The products targeted at young agricultural entrepreneurs is to help decrease the high youth unemployment in Spain. Microcredit to entrepreneurs in general who wants to start or consolidate a business and to green entrepreneurs whose business has an environmental focus. New investment in SMEs in order to boost their competitiveness (EUR 660,085 thousands) and to provide financial solution for restructuring in order to maintain jobs (EUR 219,176 thousands).
b.	Partially	The strategy of GCC is to contribute to improve the youth unemployment and in providing stable youth employment. To promote equal opportunities and to encourage entrepreneurial spirit. Strategy of having branches in low populated areas is to development the rural areas and to prevent inequality. Currently working with KPMG to develop an impact assessment framework in order to measure socio-economic impacts.
c.	Partially	Products aimed at women and young people are commercial, the social and cultural centres are not commercial.

Indicator: G4-EC8	**Level of information**	**Content**
a.	Partially	The impacts of GCC is characterised in general by the generation of jobs and contribution to GDP, but also in terms of efficiency, the conservation of resources, environmental protection and investment in R&D. With the payment of suppliers, employees' wages and tax payments, it generates an effective economy, which produces economic transactions in all sectors.
b.	In G4 Index, not in report	-

Indicator: G4-DMA-b Guidance for Procurement Practices	Level of information	Content
-	Not	-

Indicator: G4-EN15	Level of information	Content
a.	Complete	Vehicle fleet: 493 tonnes. In total: 493 tonnes.
b.	Complete	Only CO2 is reported.
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	-
e.	In G4 Index, not in report	-
f.	In G4 Index, not in report	-
g.	In G4 Index, not in report	-

Indicator: G4-EN16	Level of information	Content
a.	Complete	Scope 2 total emission: 8.743 tonnes. Electricity: 8.743 tonnes.
b.	Complete	Only CO2 is reported.
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	-
e.	In G4 Index, not in report	-
f.	In G4 Index, not in report	-

Indicator: G4-EN17	Level of information	Content
a.	Complete	Scope 3 total emissions: 1,245 tonnes. Movement of workers: 912 tonnes. Business travel (train and plane): 342 tonnes.
b.	Complete	Only CO2 is reported.
c.	In G4 Index, not in report	-
d.	Partially	Movement of workers Business travel (train and plane).
e.	In G4 Index, not in report	-

f.	In G4 Index, not in report	-
g.	In G4 Index, not in report	-

Indicator: G4-EN30	**Level of information**	**Content**
a.	Complete	CO2 emissions: Reported in Gj: The transport of workers: 11,897 Business travels (train and plane): 4,459 Vehicle fleet: 6,425 Total: 22,781 Gj. Reported in ton: The transportation of workers: 912 (indirect) Business travels (train and plane): 342 (indirect) and vehicle fleet: 493 (direct).
b.	Complete	A focus on videoconferencing in order to reduce the number of business travels. Furthermore, a control is set in place and by using different measurement to control whether a travel is necessary, the aim is to reduce the number of travels.
c.	In G4 Index, not in report	-

Indicator: G4-EN31	**Level of information**	**Content**
a.	Partially	Lighting control: Instalment of lighting control in 110 offices, at a cost of EUR 1000 pr. office - in total EUR 110,000. Change of lighting to LED technology in 50 offices at a cost of EUR 3,200 pr. office - in total EUR 160,000. Change of air conditioning in 18-19 offices at a cost of approximately EUR 10,000 pr. office - in total EUR 184,000. Energy efficiency in the agricultural sector: investment of (in thousands) EUR 563,400. Investment in the agricultural sector of extreme climate: (in thousands) EUR 45,765.

Indicator: G4-LA13	**Level of information**	**Content**
a.	Partially	Salary ratio of women to men: BCC: Managers: 78.48% average seniority: men: 4.72 & women: 3.31. Junior managers: 0.00% Average seniority: men: 0.00 & women: 0.00. Technical staff: 93.00% Average seniority: men: 5.89 & women: 4.32 Others: 100.90%. Average seniority: men: 5.80 & women: 4.50.

		Cajamar Caja Rural: Managers: 89.40% average seniority: men: 4.42 & women: 3.72. Junior managers: 90.80% Average seniority: men: 4.91 & women: 3.60. Technical staff: 93.28% Average seniority: men: 7.88 & women: 4.98 Others: 88.57%. Average seniority: men: 6.56 & women: 4.38. All other entities: Managers: 84.42% average seniority: men: 5.67 & women: 5.66. Junior managers: 88.20% Average seniority: men: 5.24 & women: 5.59. Technical staff: 86.21% Average seniority: men: 4.58 & women: 4.45 Others: 90.15%. Average seniority: men: 5.70 & women: 5.39.
b.	In G4 Index, not in report	-

Indicator: G4-SO2	**Level of information**	**Content**
a.	In G4 Index, not in report	-

Indicator: FS6	**Level of information**	**Content**
-	Partially	Customer Credit Investment (Consumer Credit): EUR 33,080,422 million. Where credit to public administrations: EUR 959,377 million. Credit to other resident sectors EUR: 26,007,455 million. Credit to other non-resident sectors: EUR 180,508 million. Questionable assets: EUR 5,852,186 million. Other financial assets: EUR 80,896 million. Structure of customer credit: Agricultural cooperatives: EUR 2,997 million. Large retailers: EUR 748 million. Public administrations: EUR 1,343 million. Financial intermediaries: EUR 468 million. Mortgages: EUR 15.252 million. Small business: EUR 4,454 million. Small farms (agricultural): EUR 2,040 million. Credit cards: EUR 530 million. Developers: EUR 4,007 million. SMEs: EUR 2,451 million. Non-profit entities: EUR 281 million.

Indicator: FS7	**Level of information**	**Content**

-	In G4 Index, not in report	Aware of the social economy's importance in the creation and maintenance of employment, as well as its capacity to boost rural areas, the Cajamar Cooperative Group's business model lends special support to organizations of a social nature as a means of commitment to local economic development and social progress, promoting equal opportunities for men and women, reducing social inequalities, inserting people at risk of social exclusion, generating stable and reconciliation of personal, family and work life and environmental sustainability. The generates an important positive impact for its stakeholders. This impact is fundamentally characterized in terms of employment generation and contribution to GDP, but also in terms of efficiency, conservation of resources, protection of the environment and investment in R & D. The primary contributions are wages and interest received by cooperatives, payment to suppliers and payment of taxes.

Indicator: FS10	**Level of information**	**Content**
-	In G4 Index, not in report	-

Indicator: FS11	**Level of information**	**Content**
-	Partially	The classification (which seeks to identify companies who violate reaffects the entire corporate business loan portfolio and is carried out every 3 years in order to assess its evolution, being the last classification of the year 2013

Indicator: FS13	**Level of information**	**Content**
-	Partially	39 Group offices and 82 correspondents were operating in municipalities where no other financial entities were present. 30% of branch offices are situated in areas populated by less than 5,000 habitants.

Indicator: FS14	**Level of information**	**Content**
-	Partially	Web accessibility or interface, indicates the ability to access the Web and its contents by all people, regardless of the disability (physical, intellectual or technical) that they present or that derive from the contexts of use (technological or environmental).

Indicator: Former FS16	**Level of information**	**Content**
-	Not	-

Appendix Q

Grupo Cooperativo Cajamar – Information Reported on the 20 Indicators, Reporting Year 2015

Indicator: G4-EC1	Level of information	Content
a.	Partially	Economic value generated (in thousands of euros) Gross margin: 951,627 Low-value assets: (13,610) Non-recurrent earnings(loss): 5,784 Total economic value generated: 943,801. Economic value distributed: Staff costs: 357,093 Suppliers: 189,416 Tax: (12,793) Interest on contributions to capital: 37,801 Community investment (without foundations): 0. Commitment to society (foundations): 576,430. Total economic value retained: 367,371.
b.	In G4 Index, not in report	-

Indicator: G4-EC5	Level of information	Content
a.	Partially	Minimum entry salary at GCC: 20,748.80 euros. Minimum entry salary for profession: 9,080.50 euros. Ratio 2.29.
b.	In G4 Index, not in report	-
c.	In G4 Index, not in report	-

Indicator: G4-EC6	Level of information	Content
a.	In G4 Index, not in report	-
b.	In G4 Index, not in report	-
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	-

Indicator: G4-EC7	Level of information	Content
a.	In G4 Index, not in report	-
b.	In G4 Index, not in report	-
c.	In G4 Index, not in report	-

Indicator: G4-EC8	Level of information	Content
a.	Partially	Generation of jobs indirectly, the GCC generates employment through the expenditure it makes in its supply chain, the salary expense of its employees and the payment of taxes to the Public Administration. The focus on local procurement, with more than 99% of suppliers being local, this favours job creation in the areas where the company is highly present. The GCC's first level suppliers induce economic activity in their own suppliers, thereby stimulating the supply chain as a whole.
b.	In G4 Index, not in report	-

Indicator: G4-DMA-b Guidance for Procurement Practices	Level of information	Content
-	Partially	In order to continue developing these principles, although in 2015 there were no significant negative environmental, social or labor practices in the supply chain or problems related to Human Rights, the GCC has developed a new policy that pursues contribute to the continuous improvement of the economic, financial, social and environmental performance of the whole value chain and supply in which it is involved. As an important part of this policy, the Group has also approved the Code of Ethics and good practices of suppliers, collaborators and subcontractors, incorporated in the process of approval for suppliers in a progressive manner in 2016 and the breach of contract being the cause of termination of contract.

Indicator: G4-EN15	Level of information	Content
a.	Complete	401 tonnes.
b.	Complete	CO2 reported only.
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	-
e.	In G4 Index, not in report	-

f.	In G4 Index, not in report	-
g.	In G4 Index, not in report	-

Indicator: G4-EN16	**Level of information**	**Content**
a.	Complete	2,663 tonnes.
b.	Complete	CO_2 reported only.
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	-
e.	In G4 Index, not in report	-
f.	In G4 Index, not in report	-

Indicator: G4-EN17	**Level of information**	**Content**
a.	Complete	Employee travels (commute): 763 tonnes Business travel (train and plane): 481 tonnes. Total indirect emissions: 1,244 tonnes
b.	Complete	CO_2 reported only.
c.	In G4 Index, not in report	-
d.	Partially	*Movement of workers *Business Trips (train and plane).
e.	In G4 Index, not in report	-
f.	In G4 Index, not in report	-
g.	In G4 Index, not in report	-

Indicator: G4-EN30	**Level of information**	**Content**
a.	Complete	Tonnes of CO_2 emissions: Vehicle fleet: 401 tonnes. Employee transportation (commute): 763 tonnes. Business travel (train & plane): 481 tonnes.
b.	In G4 Index, not in report	-
c.	In G4 Index, not in report	-

Indicator: G4-EN31	Level of information	Content
a.	Not	Grupo Cooperativo Cajamar in 2015 has not determined the environmental investments broken down so the data is not available. Its determination is foreseen in the quintennium related to the Eco-efficiency Plan

Indicator: G4-LA13	Level of information	Content
a.	Partially	Salary ratio of women to men: BCC: Managers: 73.96% average seniority: men: 17.65 & women: 14.74. Junior managers: 95.03% Average seniority: men: 18.67 & women: 14.55. Technical staff: 89.48% Average seniority: men: 16.11 & women: 12.87 Others: 110.86%. Average seniority: men: 18.91 & women: 15.25. Cajamar Caja Rural: Managers: 88.60% average seniority: men: 16.67 & women: 14.52. Junior managers: 92.37% Average seniority: men: 16.05 & women: 13.59. Technical staff: 81.47% Average seniority: men: 17.65 & women: 13.47 Others: 88.36%. Average seniority: men: 18.41 & women: 13.88. All other entities: Managers: 87.50% average seniority: men: 21.21 & women: 20.03. Junior managers: 88.73% Average seniority: men: 22.92 & women: 19.27. Technical staff: 82.91% Average seniority: men: 15.17 & women: 13.94 Others: 92.34%. Average seniority: men: 18.43 & women: 16.05.
b.	In G4 Index, not in report	-

Indicator: G4-SO2	Level of information	Content
a.	Partially	Financial exclusion in rural areas. An important driver of depopulation is the lack of access to credit and financial products. GCC's strategy is to remain close to its roots as a group of rural banks and remain in proximity to its customers.

Indicator: FS6	Level of information	Content
-	Not	The information related to the breakdown of the portfolio for the business lines by region is not disclosed for reasons of confidentiality

Indicator: FS7	Level of information	Content
-	Partially	* The Emprende Financing Line will allow self-employed and micro enterprises to undertake new projects and consolidate existing ones, with special attention to the social economy and the Agrifood sector. Financial solutions to families and individuals struggling to meet their mortgage payments: investment (in thousands): 210,919 euros. "Crediestudios" is offered for students to finance their education: investment (in thousands): 2,831 euros.

Indicator: FS10	Level of information	Content
-	In G4 Index, not in report	-

Indicator: FS11	Level of information	Content
-	Partially	The GCC is working on the identification of social and environmental risks, as well as the development of actions aimed at the implementation of audits that evaluate these risks, hoping to advance in this area in the medium term. Environmental risk assessment is done every three years for the entire credit portfolio for corporate clients and in 2013, 0.57% where identified as having high financial environmental risk. No assessment assessing social risks is available.

Indicator: FS13	Level of information	Content
-	Not	-

Indicator: FS14	Level of information	Content
-	Not	-

Indicator: Former FS16	Level of information	Content
-	Partially	In 2008 the GCC joined the initiative of the Bank of Spain and the National Securities Market Commission, whose main objective was to involve financial institutions in the promotion of education and financial culture among different groups, but especially among school children. Since then, the Group has been expanding its training offer designing and developing both teaching materials and educational actions with schools to promote financial education.

Appendix R

ING Group – Information Reported on the 20 Indicators, Reporting Year 2014

Indicator: G4-EC1	Level of information	Content
a.	Partially	Economic Value Generated: EUR 15.3 billion Economic Value Distributed: Suppliers/Operating Costs: EUR 2,159 million. Employees/Staff Expenses: EUR 5,788 million Shareholders/Net Results: EUR 2,657 million. Governments/Corporate Income Tax and Bank Levies: EUR 1,459 million. Community/Total Donations: EUR 11.3 million.
b.	In G4 Index, not in report	-

Indicator: G4-EC5	Level of information	Content
a.	Not	-
b.	Not	-
c.	Not	-

Indicator: G4-EC6	Level of information	Content
a.	Not	-
b.	Not	-
c.	Not	-
d.	Not	-

Indicator: G4-EC7	Level of information	Content
a.	Partially	Structured Finance is a traditional lending business with specialised industry knowledge that is split into three subsectors: the Energy, Transport and Infrastructure Group (EITG), International Trade and Export Finance (ITEF) and Specialised Financing Group. ETIG specialises in capital-intensive industry sectors such as offshore services, shipping, aviation, utilities and power, infrastructure, mining and oil and gas. Projects: Freeport LNG (Liquefied Natural Gas), support in their 8.4 billion senior secured debt financing for the development and construction of the first two (of three) LNG liquefaction trains and expansion of the common facilities. Support to the Gate Terminal to build new facilities for distribution of LNG vessels and barges through a 15-year, EUR 76 million financing agreement.

		Lead arranger and joint facility agent for a USD 5.6 billion term loan facility for STAR Rafineri, which is Turkey's largest-ever project financing. Next to Azerbaijan's national oil and gas company SOCAR and the State Oil Fund of Azerbaijan. Real-estate financing. Financial markets: It aims to service ING's institutional corporate and retail clients with relevant financial market products - a gateway to the global institutional markets.
b.	Complete	Gate Terminal: by using LNG as fuel for vessels, ferries, trucks and industrial application, there will be a reduction of CO2 emissions by up to 20% and nitrogen oxide (Nox) up to 85% and sulphur and particle emission to almost 0. Star Refinery: SOCAR is using the facility to expand its reach beyond Azerbaijan and to assist in the development of Petkim, petrochemical subsidiary next to the site.
c.	Complete	Reported, information is in the commercial banking chapter.

Indicator: G4-EC8	Level of information	Content
a.	In G4 Index, not in report	-
b.	In G4 Index, not in report	-

Indicator: G4-DMA-b Guidance for Procurement Practices	Level of information	Content
-	Not	-

Indicator: G4-EN15	Level of information	Content
a.	Partially	23 kilo tonnes. Or 23,000 tonnes.
b.	Complete	Only CO2 is reported.
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	2013 is the starting year in the table.
e.	Partially	Scope 1 comprises emissions from our use of natural gas and fuel oil. 90% coverage of employees
f.	In G4 Index, not in report	-
g.	In G4 Index,	-

	not in report	

Indicator: G4-EN16	Level of information	Content
a.	Partially	39 kilotonnes or 39,000 tonnes.
b.	Complete	Only CO2 is reported.
c.	In G4 Index, not in report	2013 is the starting year in the table.
d.	Partially	Scope 2: comprises emission from our use of electricity, renewable electricity and district heating. 90% coverage of employees
e.	In G4 Index, not in report	-
f.	In G4 Index, not in report	-

Indicator: G4-EN17	Level of information	Content
a.	Partially	31 kilotonnes or 31,000 metric tonnes.
b.	Complete	Only CO2 is reported.
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	-
e.	In G4 Index, not in report	2013 is the starting year in the table.
f.	Partially	Scope 3: compromises emissions from our business travel by air and car. 90% coverage of employees
g.	In G4 Index, not in report	-

Indicator: G4-EN30	Level of information	Content
a.	Not	-
b.	Not	-
c.	Not	-

Indicator: G4-EN31	Level of information	Content
a.	Not	-

Indicator: G4-LA13	Level of information	Content
a.	In G4 Index, but not in report	Remuneration at Supervisory board levels is equal for male and females according to ING's policy of non-discrimination based on age, gender or cultural background in People Management. At all levels through the company, remuneration is a function of scale or grade, both for man and

		women.
b.	In G4 Index, but not in report	-

Indicator: G4-SO2	**Level of information**	**Content**
a.	Not	-

Indicator: FS6	**Level of information**	**Content**
-	In G4 Index, not in report	Consumer lending: 40.7% Financial institutions: 15.5% Governments: 11.6% Other: 2.2% Corporates: 30.0% and of those 30%: Natural resources: 5.5% Real estate: 5.3% Transportation and logistics: 3.2% Food, beverages and personal care: 2.3%. General industries: 2.3 % Services: 2.2% Builders and contractors: 1.8%. Utilities: 1.6% Chemicals, health and pharmaceuticals: 1.5%. Media+telecom: 1.0%. Other: 1.0% Retail: 1.0%. Automotive: 0.9%. Technology: 0.4%.

Indicator: FS7	**Level of information**	**Content**
-	In G4 Index, not in report	Socially responsible investments: investments that are screened for SRI criteria. Sustainable assets under management in 2014 (in millions): €1,538.

Indicator: FS10	**Level of information**	**Content**
-	Not	-

Indicator: FS11	**Level of information**	**Content**
-	Not	-

Indicator: FS13	Level of information	Content
-	Not	-

Indicator: FS14	Level of information	Content
-	Not	-

Indicator: Former FS16	Level of information	Content
-	Not	-

Appendix S

ING Group – Information Reported on the 20 Indicators, Reporting Year 2015

Indicator: G4-EC1	Level of information	Content
a.	Partially	Economic value distributed (in millions): Operating costs: €2,274 Staff expenses: €4,972 Net result from continuing operations (shareholders): €4,477 Corporate income tax and bank taxes: €1,881 Total donations: €12.1
b.	In G4 Index, not in report	-

Indicator: G4-EC5	Level of information	Content
a.	Not	-
b.	Not	-
c.	Not	-

Indicator: G4-EC6	Level of information	Content
a.	Not	-
b.	Not	-
c.	Not	-
d.	Not	-

Indicator: G4-EC7	Level of information	Content
a.	Partially	Structured Finance: split into three segments: Energy, Transport and infrastructure group (ETIG), the international trade and export finance (ITEF) and the specialised financing group. Galloper wind farm ltd. NG participated in a GBP 1.37 billion project finance for Galloper Wind Farm Ltd. for the construction of a 336 megawatt offshore wind farm in the UK. ETIG: specialises in capital intensive sectors. Such as offshore services, shipping, aviation, utilities and power, infrastructure, mining and oil and gas. Financial markets business targets developed markets and fast-growing economies, focusing on rates and currencies in addition to credit products. Through FM, ING provides client with a gate-way to global institutional markets Cheniere Corpus Christi Holdings - joint lead arranger and bookrunner in the successful closing of one of the largest project finance transaction in the US: the USD 11.5 billion financing of Cheniere's Corpus Christi Gas Liquefaction Project.

		Ajman Sewerage (Private) Company Limited. Sole advisor and arranger in 2006 on a USD 100 million debt facility to fund the construction of the required infrastructure - an acted as controlling creditor for an additional capex loan facility of USD 25 million to fund expansion of waste-water treatment plant and sewer network. Cetin: ING played a leading role in the CZK 32.2 billion financing for CETIN, the largest Czech telecommunication infrastructure provider. CETIN was spun off from O2 Czech Republic, an integrated telecommunications operator (formerly Telefonica Czech Republic a.s.), in the first ever voluntary structural separation in the world of a telecommunications infrastructure by an incumbent. ING Green bond: dual tranche five-year EUR 500 million and three year USD 800 million green bond to go to projects under the newly established green bond framework, including renewable energy, green buildings, public transport, waste, water and energy efficiency.
b.	Partially	Galloper Wind Farm Ltd. Once completed, the wind farm is expected to generate enough renewable energy per year to meet the electricity needs of around 330,000 homes. It will significantly contribute to meeting the UK's 2020 target to source 15 per cent of its energy for heat, transport and power from renewable sources
c.	Complete	They are all part of commercial activity.

Indicator: G4-EC8	**Level of information**	**Content**
a.	Partially	As a financer of business across all sectors and industries, ING has significant indirect economic impact on the larger economy and society through every product or service. However, the impact is too large and too diverse to be captured through any data tooling. For example, a corporate facility will not only impact the client company, but will also have a domino effect on the communities where the company operates/ manufactures/ sells its products. In 2015 we have however measured for the first time how many people feel financially empowered through our Financial Empowerment initiatives. This is published in the Annual Report.
b.	In G4 Index, not in report	-

Indicator: G4-DMA-b Guidance for Procurement Practices	**Level of information**	**Content**
-	Not	-

Indicator: G4-EN15	Level of information	Content
a.	Partially	21 kilotonnes or 21,000 metric tonnes.
b.	Complete	Only CO2 is reported.
c.	In G4 Index, not in report	-
d.	Partially	Base year is 2014.
e.	Partially	Coverage of employees: 95% Scope 1: comprises emissions from our use of natural gas and fuel oil;
f.	In G4 Index, not in report	-
g.	In G4 Index, not in report	-

Indicator: G4-EN16	Level of information	Content
a.	Partially	27 kilotonnes or 27,000 tonnes.
b.	Complete	Only CO2 is reported.
c.	Partially	Base year is 2014.
d.	Complete	The total carbon figure for Scope 2 displayed here is calculated using the GHG Protocol Market-based calculation method outlined within the Scope 2 Guidance. This method takes into account the use of renewable electricity with an emissions factor of 0 g CO2e/MWh. Using the Location-based method outlined within the Scope 2 Guidance, our scope 2 CO2e emissions for our base-year (2014) is 116 kilotonnes and for 2015 is 111 kilotonnes. Scope 2: comprises emissions from our use of electricity, renewable energy and district heating. Coverage of employees: 95%
e.	Partially	Emissions factor of 0 g CO2e/MWh reported for renewable electricity.
f.	In G4 Index, not in report	-

Indicator: G4-EN17	Level of information	Content
a.	Partially	35 kilotonnes or 35,000 metric tonnes.
b.	Complete	Only CO2 is reported.
c.	In G4 Index, not in report	-
d.	Partially	Business travel by air and car.
e.	Partially	Base year is 2014.
f.	Partially	Scope 3: comprises emissions from our business travel by air and car. Coverage of employees: 95%
g.	In G4 Index, not in report	-

Indicator: G4-EN30	Level of information	Content
a.	Not	-
b.	Not	-
c.	Not	-

Indicator: G4-EN31	Level of information	Content
a.	Not	-

Indicator: G4-LA13	Level of information	Content
a.	In G4 Index, not in report	Remuneration at Supervisory board levels is equal for male and females according to ING's policy of non-discrimination based on age, gender or cultural background in People Management. At all levels through the company, remuneration is a function of scale or grade, both for man and women
b.	In G4 Index, not in report	-

Indicator: G4-SO2	Level of information	Content
a.	Not	-

Indicator: FS6	Level of information	Content
-	In G4 Index, not in report	Risk exposure in 2015: Consumer lending: 39.2%. Financial institutions: 17.0% Governments: 10.5% Other: 1.5%. Corporates: 31.8% and out of those 31.8%: Real estate: 5.5% Natural resources: 5.7%. Transportation and logistics: 3.6%. Services: 2.4% Food, beverages and personal care: 2.6% General industries: 2.3%. Builders and contractors: 1.8%. Chemicals, health and pharmaceuticals: 1.7%. Other: 1.2%. Utilities: 1.6%. Media+telecom: 1.1%. Retail: 1.0%. Automotive: 1.0%. Technology: 0.5%,

Indicator: FS7	Level of information	Content
-	Partially	Sustainable assets under management (in millions): €2,573. ING Groenbank focuses on sustainable investment such as lending services at favourable rates to sectors such as renewable energy generation, organic farming, sustainable construction and the re-use of waste materials, all with a strong focus on the Netherlands. Moreover, ING Groenbank offers 10 per cent of its balance sheet towards financial inclusions activities with microfinance such as female entrepreneurs. Sustainable transitions financed - not relevant for this indicator.

Indicator: FS10	Level of information	Content
-	Not	-

Indicator: FS11	Level of information	Content
-	Not	-

Indicator: FS13	Level of information	Content
-	Not	-

Indicator: FS14	Level of information	Content
-	Not	-

Indicator: Former FS16	Level of information	Content
-	Not	-

Appendix T

RZB Group – Information Reported on the 20 Indicators, Reporting Year 2014

Indicator: G4-EC1	Level of information	Content
a.	Partially	There are currently no extended disclosures on the FSSS, work will be carried out on the collection of data. Turnover of €5,884.0 million of which 433.1 million was in Austria. Staff and material costs: €716.5 million. A direct value creation of €341.1 million and a total gross value added of €735.5 million generated through Austria. The taxes and charges paid by the RZB group in Austria in 2013, amount to nearly €549 million. Economic Value Generated: €5,732 million. Economic Value Distributed: Staff expenses: €1,579 million. Other administrative expenses: €1,286 million. General administrative expenses: €3,294 million. Income taxes: €504 million. Social security and staff-related taxes: €289 million. Owners (RBI AG): €20 million. Total: €6,972 million
b.	In G4 Index, not in report	-

Indicator: G4-EC5	Level of information	Content
a.	Not	-
b.	Not	-
c.	Not	-

Indicator: G4-EC6	Level of information	Content
a.	Not	-
b.	Not	-
c.	Not	-
d.	Not	-

Indicator: G4-EC7	Level of information	Content
a.	Partially	Last year, RBI AG once again supported numerous institutes of the Raiffeisen Banking Group in Austria in financing a total of 260 projects for water supply facilities, waste water systems, schools and kindergartens as well as similar public works projects.

		RZB AG supports the Vienna University of Economics and Business Administration (WU) in Austria and has financed a modern language facility in the Raiffeisen language resource center. The use of the facilities are free of charge. H. Stepic CEE Charity Recreational center for people with disabilities: There has not been a single recreational facility for the around 3,900 disabled people living in Sfantu Gheorghe up until now. H. Stepic CEE Charity and its project partners took care of the construction of a leisure and recreation center. A maximum of 24 disabled people can be looked after by qualified employees at the center for a period of 14 days. This is time which their caregivers can use to recover from the stress of their everyday life. Friendship castle in Dobrich, Bulgaria: H. Stepic CEE Charity is financing the construction of a daycare center in Bulgaria for children in need together with the Austrian Youth Red Cross. Around 30 children can be accepted into the center, prepared for attending school and integrated into a social system. The educational goal is to reintegrate them into society and not to tie them down to one “home”. However, in exceptional circumstances, children can also spend the night at the daycare center. H. Stepic CEE Charity has established in cooperation with Petrus Advisers and the Center for Youth Integration (CYI) a non-profit organization, a daycare center for street children, in Belgrade. This project and various other initiatives of the CYI offer children and young people living on the street (and sometimes their families) psychological, social-work, medical and hygiene advice and care with the aim of integrating them into society in the long term. Children's Town - family houses for orphan children in Pnikut, Ukraine. H. Stepic CEE Charity built a family house in Pnikut, a small town in the Ukraine, in cooperation with the “kleine herzen” (little hearts) association and Caritas Spes and thanks to the generous support of Stephen Davis (S&R Charitable Foundation) as part of the “Children’s Town” project. Socially disadvantaged orphan children with particular emotional and physical needs are supported at this house until they become adults. Preservation of the "Quo Vadis" Childcare center in Berdyansk Ukraine. The charity supports the “Quo Vadis” childcare center along with Caritas Spes in Berdyansk by assuming some of the running costs. This facility is often the only place of refuge for the local children. More than 50 of these children took advantage of the help offered by the childcare center in 2014. They come from socially deprived or violent families and would have no future other than a life on the streets if it weren’t for the support of the center. Employees can volunteer for one day per year in Raiffeisenbank Hungary & Romania. Institute for people with Down Syndrome The foundation “Down Syndrome Albania” is the only point of assistance for people with Down Syndrome in Albania. With the support of Raiffeisen Bank

		Sh.a., the offices of the foundation were renovated, including the attached service center. The 10-person team of psychologists and therapists offers support and therapy for people with Down Syndrome. In a first stage in 2014, roughly 30 children profited from their services. SUMERO Providing support for the handicapped and their integration into society is one of the goals of Raiffeisen BANK d.d. Bosna i Hercegovina. In cooperation with SUMERO, an organization for assisting disabled persons in Bosnia and Herzegovina, the construction of a center for the development and rehabilitation of handicapped persons was continued. This center strives to provide individual support for its charges and their families. Another focus of the work lies on more efficient integration of handicapped persons in order to improve their quality of life. Children in Need Support for the charitable initiative of Priorbank J.S.C. “Children in need” was continued in 2014. The goal of building 20 homes with the name “Pension Borovliany” in order to offer accommodations to families from all over Belarus who bring their children to the connected oncology center has now been nearly achieved. 14 houses are already finished, three of them thanks to the support of Priorbank. In many cases, the children are able to join their families in the rented rooms after their daily treatment at the cancer center.
b.	Partially	Recreational center for people with disabilities: There has not been a single recreational facility for the around 3,900 disabled people living in Sfantu Gheorghe up until now. A maximum of 24 disabled people can be looked after by qualified employees at the center for a period of 14 days. This is time which their caregivers can use to recover from the stress of their everyday life. Friendship Castle: Around 30 children can be accepted into the center, prepared for attending school and integrated into a social system. The educational goal is to reintegrate them into society and not to tie them down to one “home”. However, in exceptional circumstances, children can also spend the night at the daycare center. Daycare center for street children in Belgrade: This project and various other initiatives of the CYI offer children and young people living on the street (and sometimes their families) psychological, social-work, medical and hygiene advice and care with the aim of integrating them into society in the long term. Children's town in Pnikut, Ukraine: Socially disadvantaged orphan children with particular emotional and physical needs are supported at this house until they become adults. Preservation of the "Quo Vadis" Childcare center in Berdyansk, Ukraine: This facility is often the only place of refuge for the local children. More than 50 of these children took advantage of the help offered by the childcare center in 2014. They come from socially deprived or violent families and would have no future other than a life on the streets if it weren’t for the support of the center. Institute for people with Downs Syndrome: The foundation “Down Syndrome Albania” is the only point of assistance for people with Down Syndrome in Albania. The 10-person team of psychologists and therapists offers support

		and therapy for people with Down Syndrome. In a first stage in 2014, roughly 30 children profited from their services. SUMERO: In cooperation with SUMERO, a center for the development and rehabilitation of handicapped persons was continued. This center strives to provide individual support for its charges and their families. Another focus of the work lies on more efficient integration of handicapped persons in order to improve their quality of life. Children in Need, Pension Borovliany: accommodations to families from all over Belarus who bring their children to the connected oncology center has now been nearly achieved. 14 houses are already finished, three of them thanks to the support of Priorbank. In many cases, the children are able to join their families in the rented rooms after their daily treatment at the cancer center.
c.	Complete	260 projects for water supply facilities, waste water systems, schools and kindergartens as well as similar public works projects - these were commercial and the rest were pro-bono.

Indicator: G4-EC8	**Level of information**	**Content**
a.	Partially	The world bank group recently provided guarantees in the amount of €457 million ot the network banks in Albania, Belarus, Bosnia & Hercegovina as well as Kosovo and Serbia - by reducing the risk of our network banks, it is possible to maintain local lending, stimulate economic growth, improve the labour market situation and reduce poverty. Added value to the economy by being a responsible banker: Successful business through responsible management and business strategies, sustainable economic responsibility in the real and regional economy and integration of sustainability aspects into the core business. Approximately 5,236 jobs were created (indirectly or induced) or secured in Austria due to the activities of RZB Group.
b.	In G4 Index, not in report	-

Indicator: G4-DMA-b Guidance for Procurement Practices	**Level of information**	**Content**
-	Not	-

Indicator: G4-EN15	**Level of information**	**Content**
a.	Complete	RBG: 113 tonnes. RBI AG: 199 tonnes. CE: 3,759 tonnes.

		SEE: 2,111 tonnes. RU: 123 tonnes. CEE Other: 696 tonnes. In total 7,001 tonnes.
b.	Complete	Only CO2 is reported.
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	-
e.	Partially	The scope figures (scope defines the attribution of CO2 emissions according to the Greenhouse Gas Protocol) cannot be compared with those from the previous year, because the parcel service and transport of goods were separated out. RBI AG has had an audit performed in accordance with ISO 14064-3 since 2013 Scope 1 covers all emissions generated directly through combustion in company plants
f.	In G4 Index, not in report	-
g.	In G4 Index, not in report	-

Indicator: G4-EN16	**Level of information**	**Content**
a.	Complete	RBG: 354 tonnes. RBI AG: 151 tonnes. CE: 11,972 tonnes. SEE: 9,027 tonnes. RU: 4,261 tonnes. CEE Other: 3,055 tonnes. In total: 28,820 tonnes.
b.	Complete	Only CO2 is reported.
c.	In G4 Index, not in report	-
d.	Partially	The scope figures (scope defines the attribution of CO2 emissions according to the Greenhouse Gas Protocol) cannot be compared with those from the previous year, because the parcel service and transport of goods were separated out. Scope 2 the purchased energy such as electricity and heat
e.	In G4 Index, not in report	-
f.	In G4 Index, not in report	-

Indicator: G4-EN17	**Level of information**	**Content**
a.	Complete	RBG: 541 tonnes. RBI AG: 2,314 tonnes.

		CE: 8,532 tonnes. SEE: 6,009 tonnes. RU: 2,742 tonnes. CEE Other: 2,497 tonnes. In total: 22,635 (on page 135, total says 22,631) tonnes.
b.	Complete	Only CO2 is reported.
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	-
e.	In G4 Index, not in report	-
f.	Partially	The scope figures (scope defines the attribution of CO2 emissions according to the Greenhouse Gas Protocol) cannot be compared with those from the previous year, because the parcel service and transport of goods were separated out. Scope 3 covers the emissions generated by third-party services and advance services such as paper, water consumption, waste and business trips.
g.	In G4 Index, not in report	-

Indicator: G4-EN30	**Level of information**	**Content**
a.	In G4 Index, not in report	-
b.	Complete	In Vienna: Public transport costs are covered in full by RZB AG and RBI AG. Bicycle rooms and parking space is provided, an annual bicycle repair service is offered and company bikes available for meetings in Vienna. Efforts to use renewable fuels in company vehicles and to promote e-mobility. Emphasize on the use of alternative methods of communication such as video or web conferences. Raiffeisen-Leasing has introduced a company car program where CO2 limits are defined in the different authorization categories and employees are fined if these are exceeded and bonus is applied for the use of electric or hybrid vehicle. Inhouse mobility management system has been developed for car pooling. Outside Vienna: Slovakia: Replacement of the fleet to lower fuel consumption and CO2 emissions vehicle has been partially done. Preference to telephone and video conferencing. The purchase of a hybrid or a hybrid electric vehicle is planned for 2015. Czech Republic: Competition Bike2work in 2014. Commute to work by bike almost everyday for a month. The bank paid participation fee and provided infrastructure (parking, showers etc.). Overall 180 tonnes of CO2 were saved.

		Hungary: focus on video-conferencing, the use of a free shuttle bus service to reduce individual transportation. Employees receive allowance for public transportation and vehicle fleet reduced. Albania: focus on video conferencing should reduce business flights by 40%. Bosnia-Hercegovina: plans to coordinate business trips between departments. Bulgaria: has a strict travel policy and introduced a guideline on car pooling in 2013. Reduced number of company vehicle by 20% and relies heavily on video and telephone conferences Kosovo: increased use of video-conferences on a real-time platform. Croatia: increased use of video-conferencing. Replacing company fleet with environmentally friendly models that meet the EURO 5 standard. Romania: Bicycles are provided to employees at the head office and vehicle fleet replaced in 2014 with more environmentally friendly vehicles. Suport for bicycle sharing programme. Russia: Updated internal travel policy based on cost and environmental considerations and reduced the vehicle fleet by 40%. Belarus: Priorbank JSC in Belarus established the program "Fit for the Future 2016" with measures to reduce business travel.
c.	In G4 Index, not in report	-

Indicator: G4-EN31	**Level of information**	**Content**
a.	Not	-

Indicator: G4-LA13	**Level of information**	**Content**
a.	Not	The Group does not have any data, which can be used as a basis for a convincing salary assessment by comparing men and women. The reason for this is that although the data on salary can be assessed based on management level and gender, it cannot be assessed based on individual positions in accordance with our job structure. It is not possible to publish the ratios without presenting an image of the salary that may be misunderstood from outside of the company.
b.	Not	-

Indicator: G4-SO2	**Level of information**	**Content**
a.	Not	-

Indicator: FS6	Level of information	Content
-	In G4 Index, not in report	-

Indicator: FS7	Level of information	Content
-	Partially	In Czech Republic, Raiffeisenbank a.s. Offers the most important partner NGOs no-fee banking products and consultng services. Special " transparency accounts" exist for NGOs. In Bulgaria, Raiffeisenbank (Bulgaria) EAD offers special account packages to retirees for their pension payments as well as to students, alongside discounted student loans. In Croatia, discounted "Flexi Current accounts for Minors" are offered by Raiffeisenbank Austria d.d in addition to discounted pension accounts under the name " Flexi Current Accounts for Retired Persons". Also offered are "FlexiSENIOR" and "FlexiSTUDENT" service packages, which come with a range of advantages and services (current account with preferential, fixed account fees, bank card, low overdraft interest, credit card, internet and mobile banking, lower transaction fees). Account statements are offered via email and Internet banking for all bank products. In connection with the devastating floods of the previous year, all borrowers who were affected by the flooding were granted a moratorium.

Indicator: FS10	Level of information	Content
-	Not	-

Indicator: FS11	Level of information	Content
-	Partially	The sustainability process (for sustainability funds) is described on p. 66. The entire investment universe is first evaluated based on a financial criteria and a non-financial (=sustainability) criteria. For the financial criteria, evaluation to fundamental criteria is performed. Any violation of the non-financial criteria, exclude assets from the portfolio. In the second part of the analysis, there a detailed examination is performed. A broadly diversified portfolio is constructed from remaining companies or issuers and the information that has been gathered about them. The company has a managed fund volume of €26.93 billion where the share of sustainable investments in the total volume of Raiffeisen KAG is 3.4% in 2014. In GRI Content Index: It is not possible to make a GRI-compliant presentation at present for the entire RZB Group. The evaluations are being compiled.

Indicator: FS13	Level of information	Content
-	Not	-

Indicator: FS14	Level of information	Content
-	Partially	Since mid-2014, visually impaired users in Austria have had the opportunity to switch the websites of the Raiffeisen Banking Group and ELBA internet to high-contrast colours. This makes the pages much easier to read for these users. In Poland, the Polish Bank Association (ZBP) created a guide describing how disadvantaged customers should be handled at the branches and these guidelines were communicated by Raiffeisen Bank Polska S.A. to all branches and should help relationship managers provide service that is more considerate of disabled persons. In addition the website was inspected with regard to accessibility for the visually impaired and people with limited abilities to operate a mouse or keyboard. The process for identification and legitimation of the visually and hearing impaired was also revised and adapted. Tatra banka, a.s. in Slovakia has now equipped all ATMs with independent and barrier-free access. All existing and newly opened branches are also accessible without barriers. Furthermore, voice navigation for visually impaired persons has been a standard feature of every ATM since 2010. In order to achieve the best possible equal access, Raiffeisen Bank Zrt. in Hungary implemented a revised website with an integrated area for disadvantaged persons in 2015. At Raiffeisen BANK d.d. Bosnia i Hercegovina, the head office and many branches offer barrier-free access. Most ATMs are also directly accessible by wheelchair and feature multilingual (beside Bosnian also English and German) operation. The ATM keyboards additionally feature embossed numbers and a headphone jack for easier use by the visually and hearing impaired. Raiffeisen Bank (Bulgaria) EAD revised its website and blog in 2014 in the interests of operability by the blind. Both can now be converted from text to sound using special software. Multilingual product brochures, ATMs, website and e-banking tools are provided by Raiffeisenbank Kosovo J.S.C. The employees also possess language skills in Albanian, Serbian and English to permit the advising of minorities and customers with a different native tongue. Raiffeisenbank Austria d.d. in Croatia issues rules for the provision of barrier-free access at the branches and ATM locations. The Serbian Raiffeisen banka a.d. has begun a renovation project at its branches. In the course of these renovations, the entrances of existing branches as well as ATM sites will be adapted as far as possible for wheelchair access and the heights of bank counters will be lowered. The need for adaptation of

		ATMs to provide voice navigation for visually impaired persons is also being investigated. The aforementioned measures are already taken into account in the planning of new branches. At AO Raiffeisenbank in Russia, all branches built or renovated in the future will be equipped with ramps to ensure barrier-free access. If this is not possible, a wheelchair lift must be installed. Priorbank JSC in Belarus ensures the barrier-free accessibility of ATMs for physically disabled persons. The ATMs are also equipped with Braille keyboards to enable use by the visually impaired. English is installed as a navigation language in most ATMs to aid in operation by -foreign-language-speaking customers.

Indicator: Former FS16	**Level of information**	**Content**
-	Partially	Aside from the important fundamental research, projects such as the initiatives of Raiffeisen Club Austria with online stock exchange games "Raiffeisen School Investor" and "Raiffeisen Uni Investor" stand out in particular. The projects are constantly being adapted to the target group and a mobile solution is now therefore being offered for smartphones. Both Raiffeisen network banks the Bank S.A. in Romania and Raiffeisenbank a.s. in the Czech Republic have established their projects in the field of financial literacy in the form of a corporate volunteering program. These network banks are therefore following the trend of pro-bono consulting1. This involves employees passing on their expert knowledge to non-profit organizations, scientific institutions, foundations and the like. Start-up company Three Coins launched in 2012 and is supported by RZB AG in the field of fundamental work, occupies it self with financial education. The target group/beneficiaries are young people. The focus of Three Coins is to develop and implement innovative projects with a great deal of potential for financial education and to accelerate research in this field. One of these projects is the smartphone game CURE Runners which is a contemporary learning medium and thus a new approach to dealing with the issues of personal finances. Special edition of 5,000 copies of Young PEOPLE and their RIGHTS was supported by Raiffeisen that focuses on financial rights and obligations. Raiffeisen Club in Austria offers a fun way to learn how to handle money and investment products responsibly with the online stock exchange game "Raiffeisen School Investor". Knowledge of the options on the capital market and familiarity with instruments such as shares, funds and certificates is the goal. Teams of at least five students of grade level eight or higher can play School Investors. Teachers can also compete against each other. With Uni Investor, university students can trade with virtual capital at real-time prices on the Vienna Stock Exchange. The winner of the monthly ranking receives an opportunity to meet the CEO of an Austrian publicly listed

		company that has joined the Raiffeisen Club as a partner for the game. The overall winner of Uni Investor in 2014 received € 2,000 plus the chance to meet Karl Sevelda, Chief Executive Officer at RBI AG during a working day. The winner also received the opportunity to complete a one-month paid internship at RBI AG. Every year since 2006, Raiffeisen Kapitalanlage-Gesellschaft m.b.H. (RKAG) has invited schools to attend lectures and workshops about general financial market knowledge on ten to fifteen dates. The objective is to promote the responsible handling of money and capital market instruments as well as financial services. In addition, RKAG supports the Raiffeisen Climate Protection Initiative in the area of sustainable financial products as part of its cooperation with the university student organization “oikos Vienna” at Vienna University of Economics and Business Administration. The corporate volunteering program “RBCZ Ambassadors” has been offered since 2010. The employees of Raiffeisenbank a.s. in the Czech Republic (RBCZ) regularly visit local primary schools and high schools to work with them in the area of financial knowledge. The volunteers give presentations and hold discussions with pupils and teachers about bank products or the principles of responsible giving Since 2012, the Tatra banka Foundation in Slovakia has shown upper level school students and university students the right way to use the offered products and services. The goal of these events is not only to provide young people with an overview of the various financial services but also to teach them how to handle money responsibly. “Global Money Week” is an initiative of Child & Youth Finance International and is held in partnership with the OECD. The goal is to convey important topics to children and adolescents – such as how to handle money, the right way to save or how to create a solid financial foundation. The associated global events are organized every year in the second week of March. The Albanian Raiffeisen Bank Sh.a. supports “Global Money Week” with a contest for children in order to convey awareness on the issue of saving money. Many primary school children participated in the competition, which was called “My Money”. The paintings produced showed the ideas children had as to why a person should save money. In addition, Raiffeisen BANK d.d. Bosna i Hercegovina promotes financial knowledge by holding presentations at universities and informing students about banking transactions, stock exchange topics and financial products. Since 2010, Raiffeisen Bank S.A. in Romania has carried out various age-appropriate financial knowledge programs within the framework of corporate volunteering and in cooperation with Junior Achievement Romania: “Noi Insine” (“We Ourselves”) for ages 6-7, “Familia Mea” (“My Family”) for ages 7- 8, “Comunitatea Mea” (“My Community”) for ages 8-9 and “ABC- dar Bancar” (“The ABCs of Banking”) for ages 15-18. All of these programs aim to convey basic financial concepts and develop financial budgets and saving plans that are required for a financially independent and responsible life. So far, over 13,000 young people have participated in these programs. An individual set of materials has been assembled for every program. This includes a guide for teachers, workbooks for the students and other teaching materials. For the primary school programs, Raiffeisen Bank supplemented the standard literature with some helpful self-learning activities. The good results have motivated Raiffeisen Bank to roll out the program in other cities in Romania.

		Since 2012, business courses for school students have been held by AO Raiffeisenbank in Russia in cooperation with the Russian Economic Institute. Additionally, a prize for university students has been awarded since 2013 within the framework of an “Olympics for the Russian Financial Market and Consumer Knowledge”. Since 2007, Raiffeisen BANK d.d. Bosnia i Hercegovina has shared information on financial topics every evening at prime time. The aim of the program is not only to inform the public about the various banking activities but also to explain common financial terms. In addition to the topics presented, each broadcast also contains segments on stock exchange data and the ABC of business. The episodes are also available on YouTube and linked to Facebook. In mid-2014, Raiffeisen Bank Kosovo J.S.C. began a financial education initiative for its customers in cooperation with the International Monetary Fund. The plan is to hold workshops with around 200 customers until 2016. In addition, consulting should be offered to roughly 2,000 customers within two years. Various preparations, such as development of the materials, have already been completed. In 2005, Raiffeisenbank Austria d.d. in Croatia established the web portal “www.limun.hr”. With useful information about the economy and a focus on financial services, the portal contributes to advancing the topic of financial education. In 2014, roughly one million visitors were recorded, of which about 300,000 were new visitors.

Appendix U

RZB Group – Information Reported on the 20 Indicators, Reporting Year 2015

Indicator: G4-EC1	Level of information	Content
a.	Partially	Economic Value Generated: Operating income: €5,333 million. Economic Value Distributed Staff expenses: €1,515 million. Owners - dividends: €0 million. Employees - wages and salary: €1,152 million. Investment in community: €3 million (or precisely 2,991,421 euros). Public sector: €690 million, where 276 are income taxes (excluding deferred taxes), banking levies: 140 and 275 are social security costs and staff-related taxes. Economy - investments and operating costs: €1,274 million. In total: €3,119 million Economic value retained: €2,214 million
b.	In G4 Index, not in report	-

Indicator: G4-EC5	Level of information	Content
a.	Not	-
b.	Not	-
c.	Not	-

Indicator: G4-EC6	Level of information	Content
a.	Not	-
b.	Not	-
c.	Not	-
d.	Not	-

Indicator: G4-EC7	Level of information	Content
a.	Partially	Commercial In 2015, RBI AG continued to support 178 institutes of the Raiffeisen Banking Group in Austria in financing a total of 152 projects for water supply facilities, waste water systems, schools and kindergartens as well as similar public works projects for a value of € 64 million. Thus we have built up a total volume of new and existing financing of € 948 million in recent years. RBI AG also financed one of the largest nursing home portfolios in Germany as

		part of an international banking consortium. Around 8,800 people are professionally cared for in these nursing homes. A project for water supply and waste water treatment in several Russian cities was undertaken. As in the past years, Raiffeisen Bank Aval JSC again participated in an investment financing facility of the EBRD called “UKEEP” (Ukrainian Environmental Efficiency Program) in 2015. UKEEP is a joint financing facility which was developed by the EBRD. The declared goals of the facility are to foster greater energy efficiency in the Ukrainian economy, improve supply and waste management, even in regions with poor infrastructure, optimize the internal processes of the borrowers, increase the knowledge of new technologies and energy audits, support social aspects, improve fair competition and protect the natural environs through the reduction of waste and emissions. Pro-bono: Since the publication of the Corporate Volunteering Guidelines, the employees can use up to two special vacation days per year for social commitment within the framework of the offered projects. The H. Stepic CEE Charity: The charity is an independent association. All projects are managed by employees of Raiffeisen Bank International in Vienna and the Raiffeisen network in CEE on a voluntary basis. Ukraine: The daycare center “St. Martin de Porres”, which offers street children a place of refuge, was supported with additional funds in order to cover the costs for three warm meals per day for the increased number of visitors. In addition, the center’s offering was expanded thanks to the charity with a medical station where families, street children, single mothers and homeless persons can obtain free medical care. For people who are forced to leave their homes, the charity built a camp in Vinniky in the vicinity of Lviv – far from the contested regions. Approximately 200 refugees from the regions of Lugansk, Donetsk and Mariupol have found a new place to live here. Help was also provided for the “Green Grove” orphanage in Visokyi, which cares for over 100 children who suffer from physical or mental disabilities or severe illnesses such as AIDS. The H. Stepic CEE Charity provided urgently needed medical equipment in order to enable adequate treatment of these children. In addition, the charity took over the replacement of the heating system at a school in Uzhgorod because the cold temperatures in the classrooms were increasingly hazardous to the children’s health and effective instruction had become impossible. In Banya, Kuklen, Malko Tarnovo and Sofia, the charity supports four Caritas daycare centers to look after approx. 200 children from difficult family circumstances, mostly Roma, with respect to their social, health, psychological and educational needs. Most of the Roma children speak insufficient Bulgarian and for that reason alone face considerable difficulties integrating both within the education system and within society. The daycare centers work to close the children’s education gaps and other shortcomings by providing Bulgarian lessons and teaching social skills. The support and education provided at the

		daycare center gives the children the opportunity to break out of the vicious cycle of need and illiteracy. “Making Change for Children” intervenes on various levels and helps both the children and their parents to make improvements for the long term. At the heart of this approach is the weekend coaching, which benefits a total of 130 children. There is also a kindergarten, physiotherapy, literacy courses for children and parents as well as a support program for talented schoolchildren. Schoolbags and shoes for 200 children were also provided, and the transport to and from school during the cold winter months also makes life easier for them. The Hercules Center looks after approx. 40 children aged between six and 14 years living in and around Costes, ti, a small town in the south of Romania. In order to improve success at school and to reduce the number of dropouts, the center offers a wide range of social and educational activities to the children, who grow up in extremely poor conditions. The Charity covers a portion of the center’s running costs to ensure it keeps its doors open. In December 2015, RBI board member Andreas Gschwenter took on patronage for the project. In co-operation with the local organization Fundacia Crestiana Diakonia in Valea Crisului, the Charity founded an after-school care facility and learning center. Benefiting from this are socially weak children, mostly Roma, whose parents are sick or unemployed and who would otherwise have to be housed in social institutions. The top priority of the center is to cover the children’s considerable need to catch up in many areas. Recreation and leisure pursuits are also on the program in order to promote the children’s creativity and give them space to develop their talents. My familiy, my hope!, Vorontsovo, Russia: In collaboration with the aid organization “kleine herzen” (little hearts), the charity undertook the renovation of the orphanage in Vorontsovo, a small town about 700 kilometers from Moscow. Based on the principle of the SOS-Kinderdörfer, the home was converted into apartments supervised by families. Up to eight children now live with two “mothers” and thus receive the opportunity to grow up in a loving, family environment. The “Sure Beginning” house opened by the H. Stepic CEE Charity and Caritas in the north of Hungary offers professional support for underage mothers and their children. The young women are taught how to raise children, cook, run a home and the right way to deal with hygiene and money. In this way, they learn how to make do on a small budget and permanently avoid the need to seek financial assistance. The top priority is to support the mothers to independently look after their children. At the moment, approx. 15 women and 30 children make regular use of the offer, with the house essentially being available to all villagers. Raiffeisen Bank Sh.a. in Albania supported an initiative of the city of Tirana to renovate the main road as an entrance into the city. Specifically, it sponsored the construction of bicycle paths on both sides of the new road. With this measure, the Raiffeisen bank sought to encourage the city’s inhabitants to use their bicycles for daily activities, thereby contributing to the social and economic development of the community.
b.	Partially	UKEEP: The declared goals of the facility are to foster greater energy efficiency

		in the Ukrainian economy, improve supply and waste management, even in regions with poor infrastructure, optimize the internal processes of the borrowers, increase the knowledge of new technologies and energy audits, support social aspects, improve fair competition and protect the natural environs through the reduction of waste and emissions. Martin de Porres: the center's offering was expanded thanks to the charity with a medical station where families, street children, single mothers and homeless persons can obtain free medical care. Refugee camp in Vinniky: Approximately 200 refugees from the regions of Lugansk, Donetsk and Mariupol have found a new place to live here. Green Orphaniage in Visokyi that cares for over 100 children who suffer from physical or mental disabilities or severe illnesses such as AIDS. The H. Stepic CEE Charity provided urgently needed medical equipment in order to enable adequate treatment of these children. The payment of renovating heating system in a school in Uzhgorod as the cold temperatures in the classrooms were increasingly hazardous to the children's health and effective instruction had become impossible. The support of hour Cartias daycare centers in Bulgaria: The daycare centers work to close the children's education gaps and other shortcomings by providing Bulgarian lessons and teaching social skills. The support and education provided at the daycare center gives the children the opportunity to break out of the vicious cycle of need and illiteracy. Making change for children: . At the heart of this approach is the weekend coaching, which benefits a total of 130 children. There is also a kindergarten, physiotherapy, literacy courses for children and parents as well as a support program for talented schoolchildren. Schoolbags and shoes for 200 children were also provided, and the transport to and from school during the cold winter months also makes life easier for them. The Hercules Center: In order to improve success at school and to reduce the number of dropouts, the center offers a wide range of social and educational activities to the children, who grow up in extremely poor conditions. Fundacia Crestiana Diakonia: Benefiting from this are socially weak children, mostly Roma, whose parents are sick or unemployed and who would otherwise have to be housed in social institutions. The top priority of the center is to cover the children's considerable need to catch up in many areas. Recreation and leisure pursuits are also on the program in order to promote the children's creativity and give them space to develop their talents. My family, my hope!: Up to eight children now live with two "mothers" and thus receive the opportunity to grow up in a loving, family environment. The sure beginning house: they learn how to make do on a small budget and permanently avoid the need to seek financial assistance. The top priority is to support the mothers to independently look after their children. At the moment, approx.. 15 women and 30 children make regular use of the offer. Renovation of main road: the Raiffeisen bank sought to encourage the city's

		inhabitants to use their bicycles for daily activities, thereby contributing to the social and economic development of the community.
c.	Complete	Projects reported under product responsibility are commercial and those reported under supported projects and initiatives are pro-bono.

Indicator: G4-EC8	**Level of information**	**Content**
a.	In G4 Index, not in report	-
b.	In G4 Index, not in report	-

Indicator: G4-DMA-b Guidance for Procurement Practices	**Level of information**	**Content**
-	Not	-

Indicator: G4-EN15	**Level of information**	**Content**
a.	Complete	Central institute and specialised subsidiaries: 267 tonnes. RBI AG: 208 tonnes. CE: 3,075 tonnes. SEE: 2,436 tonnes. EE: 781 tonnes. In total: 6,767 tonnes.
b.	Complete	Reported in CO2.
c.	In G4 Index, not in report	-
d.	Partially	The base year for the various environmental and CO2 reduction targets is 2011.
e.	Partially	The environmental indicators contain only the head office data of the network banks. There are no plan at present to collect environmental-related data in all branches. Scope 1 comprises all the green house gas emissions produced directly in the company; e.g. from the combustion stationary sources (such as power plants, boilers), from the combustion of mobile sources (such as from the company's own fleet), from the production processes and from transient emissions. Environmental management system is based on international standards (e.g. ISO 14001).
f.	In G4 Index, not in report	-

c.

g.	In G4 Index, not in report	-

Indicator: G4-EN16	Level of information	Content
a.	Complete	Central institute and specialised subsidiaries: 103 tonnes. RBI AG: 164 tonnes. CE: 11,675 tonnes. SEE: 9,734 tonnes. EE: 7,550 tonnes. In total: 29,226 tonnes.
b.	Complete	Reported in CO2.
c.	Partially	The base year for the various environmental and CO2 reduction targets is 2011.
d.	Partially	The environmental indicators contain only the head office data of the network banks. There are no plan at present to collect environmental-related data in all branches. Scope 2 comprises indirect emissions which arise when supplying the company with energy, when an energy supplier makes power or heat available for this company. Environmental management system is based on international standards (e.g. ISO 14001).
e.	In G4 Index, not in report	-
f.	In G4 Index, not in report	-

Indicator: G4-EN17	Level of information	Content
a.	Complete	Central institute and specialised subsidiaries: 504 tonnes. RBI AG: 2,185 tonnes. CE: 8,455 tonnes. SEE: 7,583 tonnes. EE: 5,882 tonnes. In total: 24,609 tonnes. (The total in table on page 126, is 24,608).
b.	Complete	Reported in CO2.
c.	In G4 Index, not in report	-

d.	Partially	all other emissions within limit of the system, e.g. Mobility by means of plane, train and external fleet as well as office needs (such as paper).
e.	Partially	The base year for the various environmental and CO2 reduction targets is 2011.
f.	Partially	The environmental indicators contain only the head office data of the network banks. There are no plan at present to collect environmental-related data in all branches. Scope 3 comprises all other emissions caused within the limits of the system, e.g. mobility by means of plane, train and external fleet as well as office needs (such as paper). Environmental management system is based on international standards (e.g. ISO 14001).
g.	In G4 Index, not in report	-

Indicator: G4-EN30	**Level of information**	**Content**
a.	Complete	Business travel generates about 22% of emissions with 13,428 tonnes CO2. Travel is therefore the second-biggest source of emissions in the RZB group. This has an effect on both scope 1 & 3.
b.	Complete	In order to reduce business travel, the video conferencing system was expanded in Austria and at almost all network banks and will therefore no longer be listed as a separate measure. Moreover, the travel policy for business trips were revised in accordance with environmental aspects in 2013 and a mobility survey was conducted at the end of 2014.
c.	In G4 Index, not in report	-

Indicator: G4-EN31	**Level of information**	**Content**
a.	Not	-

Indicator: G4-LA13	**Level of information**	**Content**
a.	Not	There is no presentation of salaries differentiated by employee category and gender due to the complex job structures. To attempt to do so would not ensure sufficient comparability and therefore present a misleading picture of salaries.
b.	Not	-

Indicator: G4-SO2	**Level of information**	**Content**
a.	Not	-

Indicator: FS6	Level of information	Content
-	In G4 Index, not in report	-

Indicator: FS7	Level of information	Content
-	In G4 Index, not in report	-

Indicator: FS10	Level of information	Content
-	Not	-

Indicator: FS11	Level of information	Content
-	Partially	The share of sustainable investment in Raiffeisen KAG is currently 4% of the total investment volume. In retail distribution, this percentage is about 5%. In the first level of analysis, the investment universe is evaluated according to fundamental criteria in terms of financial and extra-financial(=sustainable) criteria. Meaning that companies violating ESG exclusion criteria or with insufficient financial stability are excluded at this level. In the second level of analysis, there is a more focus on a more detailed view of the individual companies. At the bottom level, a diversified portfolio is constructed from the remaining companies or issuers and the information gathered about them.

Indicator: FS13	Level of information	Content
-	Not	-

Indicator: FS14	Level of information	Content
-	Partially	In Austria, visually impaired users have the option to switch the websites of the Raiffeisen Banking Group and ELBA internet to high-contrast colors. This makes the pages much easier to read for these users. The web pages meet all standards for screen readers to read. For people who have difficulties operating the website because of limited hand mobility, there are now larger buttons and images. In Poland there is a provision by the Polish Bank Association (ZBP) regarding how to deal with disadvantaged customers in the branches. This was communicated to all branches by Raiffeisen Bank Polska S.A. These guidelines should help relationship managers provide service that is more considerate of

		disabled persons. In addition, the website was inspected with regard to accessibility for the visually impaired and people with limited abilities to operate a mouse or keyboard. Tatra banka, a.s. in Slovakia has already equipped all ATMs with independent and barrier-free access. Except for those offices in the historic city center, all existing offices are now similarly accessible barrier-free as are newly opened branches. It is also now standard that every ATM is equipped with voice navigation for visually impaired persons. Even the internet banking has been adapted for the visually impaired. The website and mobile applications features with voice navigation are currently under implementation for these customers regardless of the platform. Raiffeisen Bank Zrt. in Hungary has implemented a responsive website in 2016 with integrated barrier-free functions for disadvantaged persons to ensure the best possible equal opportunities. Raiffeisen Bank d.d. Bosna i Hercegovina has put certain rules for dealing with people with disabilities in place. The Head Office and many branches are barrier free accessible. Most ATMs are also directly accessible, providing there are no building obstacles, by wheelchair and feature multilingual operation in English and German in addition to Bosnian. The ATM keyboards additionally feature embossed numbers and a headphone jack for easier use by the visually and hearing impaired. Product and service information will also be available in Braille in the future for people with visual impairment. This project is currently being implemented. For the hearing impaired, an initiative is currently in preparation which enables web calls with sign language translators to be made so that these people have the possibility to have all of their questions regarding their banking business explained to them directly. Raiffeisenbank (Bulgaria) EAD began installing hydraulic ramps for wheelchairs and strollers in their offices in 2015. The website operability and a blog for the blind have already been revised in the past years. Text can be converted into sound using special software. For advising minorities and customers with other native languages, Raiffeisen Bank Kosovo J.S.C. has made multilingual product brochures, ATMs, websites and e-banking tools available. Employees can communicate in Albanian, Serbian and English. Raiffeisenbank Austria d.d. in Croatia has been issuing rules for preparing barrier free access in the local branches and ATM locations for many years. Raiffeisen Bank Rumänien S.A. has also planned the construction of ramps so that all ATMs in their branches are accessible for wheelchairs and strollers. Around 30 per cent of the needed ramps have already been built. The AO Raiffeisen Bank in Russia, in consultation with the Russian society for people with disabilities, started an initiative in 2015 to make barrier-free access to banking services available to disadvantaged populations through a call center. A further initiative aims to make the premises of the bank accessible barrier-free and, by 2017 at the latest, to meet all standards from the society for people with disabilities and to receive a corresponding certification. At least ten branches in

		Moscow and one in each of the other cities where the AO Raiffeisenbank is present will meet the standards by the end of 2016. Barrier-free access to the ATMs for physically impaired people in the Priorbank JSC in Belarus is being improved every year through structural changes. In addition, they are also being equipped with keyboards in Braille so that the visually impaired can operate them as well. English is installed as a navigation language in most ATMs to aid in operation by foreign-language-speaking customers. In 2015, 14 ATMs were retrofitted in this regards and new ramps were installed.

Indicator: Former FS16	**Level of information**	**Content**
-	Partially	In Vienna: Three Coins developed the smartphone game ”CURE Runners”. With this innovative training format, the company addresses people with “open learning windows”. These are people for whom the responsible handling of money is particularly important and who are also open to new ideas. In 2015, Three Coins developed an innovative training method for financial education in schools and youth centers. The contribution of RZB AG was used for the performance of the target group analysis as well as for development of the teaching guide. This work produced a target group database containing the specifics of the target groups – with its focus on the group of migrants – and detailing, for example, their characteristics, the high risk groups, examples of life situations as well as topics relating to the handling of money with which the target group is concerned. Since 2006, Raiffeisen Kapitalanlage-Gesellschaft m.b.H. has invited students of higher schools in and around Vienna to talks and workshops. The responsible use of money and capital market instruments was taught in the seven events held in 2015. For many years, Raiffeisen Club in Austria has offered a fun way to learn how to handle money and investment products responsibly with the online stock exchange game “Raiffeisen School Investor”. The goal is for participants to become familiar with the options on the capital market and with instruments such as shares, funds and certificates. With a mobile solution for smartphones, they can link up with each other and exchange tips on dealing with shares and funds. Teams of at least five students of grade level eight or higher can play School Investor. At other networkbanks: Slovakia: The “Junior Achievement Program” for grade school and higher education students was continued, offering every participant the opportunity to learn about how to responsibly handle money as well as the various financial services. Czech Republic: The corporate volunteering program “RBCZ Ambassadors”

		offered since 2010 was continued in 2015 by fifteen employees of Raiffeisenbank a.s. in various regions of the Czech Republic. In this program, financial knowledge was taught to upper grade classes and at universities in the form of presentations and discussions about bank products, in talks about the principles of responsible handling of money and in small competitions Hungary: The initiative “Pénz7” of Raiffeisen Bank Zrt. in Hungary seeks to help remedy the lack of financial education offered in schools. The target group for this project consists of students at the primary school and lower secondary school levels. They learn how to handle money and use it responsibly. Bosnia-Hercegovina: Since 2007, Raiffeisen Bank d.d. Bosna i Hercegovina has shared information on financial topics every evening on prime time television. The aim of the program is not only to inform the public about the various banking activities but also to explain common financial terms. In addition to the topics presented, each broadcast also contains segments on stock exchange data and the ABCs of business. Croatia: To heighten public awareness of financial education and improve the financial education of grade school and university students, Raiffeisenbank Austria d.d. in Croatia took part in the first European Money Week in Croatia. Raiffeisenbank Austria d.d. made itself available to 130 secondary school students for presentations on the topics of financial management, responsible money management, the history of money and the finance market. The students learned the principles of banking services and financial transactions. Another measure of Raiffeisenbank Austria d.d is to visit kindergartens and schools on World Savings Day at the end of October. On this day, children learn about the various ways to save money. In 2015, more than 770 children visited the Raiffeisen branches in Croatia. Romania: Romania within the framework of corporate volunteering and in cooperation with Junior Achievement Romania: “Noi Insine” (We Ourselves) for ages 6-7, “Familia Mea” (My Family) for ages 7-8, “Comunitatea Mea” (My Community) for ages 8-9, “Orasul nostru” (Our City) for ages 6-11, “ABCdar Bancar” (The ABCs of Banking) for ages 15-18 and the creativity and innovation challenge for ages 16-18. These programs aim to convey basic financial concepts and develop financial budgets and saving plans that are required for a financially independent and responsible life. So far, over 15,200 young people have participated in these programs. The good results and the positive feedback from the participants have motivated Raiffeisen Bank S.A. not only to continue the program but to expand it in the future to other cities in Romania as well. Ukraine: In some Ukrainian cities, various industry specialists from Raiffeisen Bank Aval JSC regularly held free financial education workshops for children aged 14 to 18. The training was held primarily at the finance academy “FARBA” in Kiev but also at universities and institutes in other cities. In addition, a cooperation with the Ministry of Education and the center for “Corporate Social Responsibility” was established in 2015 in order to develop and implement a university course for first-year students on the topic of financial education (responsible handling of money and learning about the

		various financial services). So far, 200 students in eight regions have taken advantage of this offering.

Appendix V

European Investment Bank – Information Reported on the 20 Indicators, Reporting Year 2014

Indicator: G4-EC1	Level of information	Content
a.	In G4 Index, not in report	-
b.	In G4 Index, not in report	-

Indicator: G4-EC5	Level of information	Content
a.	In G4 Index, not in report	-
b.	In G4 Index, not in report	-
c.	In G4 Index, not in report	-

Indicator: G4-EC6	Level of information	Content
a.	In G4 Index, not in report	-
b.	In G4 Index, not in report	-
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	-

Indicator: G4-EC7	Level of information	Content
a.	Partially	Eco-city in Morocco - provided a 150 million euro loan to help tackle Morocco's urban development challenges face-on. Investment in 117 MW wind farm in Jordan to meet the energy needs of over 150,000 Jordanians and reduce reliance on fossil-fuel imports. Growing forest sustainability in Slovakia by lending 210 million euro in support of an afforestation project by the Slovak Minitry of Agriculture and Rural Development.
b.	Complete	Aim to house 300,000 residents and create 100,000 jobs by 2030. This projects hope to relieve pressure on existing urban areas. Zenata will also have an impact on the construction industry, which accounts for almost a million direct and indirect jobs in Morocco. positive environmental features such as extensive green zones, water retention basins for water management, dedicated rights of way for public transport, cycle lanes, energy-efficient lighting and planning- led mixed-use development.

		The project is expected to generate significant positive environmental benefits, for example through the provision of sewerage infrastructure and the elimination of wastewater discharges from informal settlements. The EIA indicates that negative environmental impacts on air quality, soils, groundwater, etc. will be modest or negligible, and primarily concentrated during the construction phase. Due to its scale and complexity, the resettlement component carries the most significant social risk: as a result of the acquisition of 1 600 ha of land, the project will require the resettlement of over 10 000 house- holds, 238 registered businesses, other informal economic activities, livelihood strategies (including subsistence) and community infrastructure. Jordan Wind project: The project will be a major contributor to employ- ment and skills in the region, creating around 150 jobs during its construction and around 30 jobs during operation. Further indirect impacts will be felt by local businesses who meet the needs of the workforce, while no resettlement of the local population is expected. The surveys deter- mined a potential heightened risk of collision with the moving rotors for soaring migrating birds. A comprehensive post-construction monitoring programme will be developed and implemented, also allowing for adaptive management measures which may include shut down on demand based on the monitoring results. The Tafila wind farm will have wide-ranging positive social impacts through the provision of electricity to over 150 000 people. Slovak Forest Project: The investment will improve the environmental performance of farms, with 2 000 farmers' land benefiting from the modernisation of on-farm facilities, including the use of renewable energy and energy- efficient technologies. Improved nutrient manage- ment will reduce surface and groundwater pollution from livestock farming activities to improve the management of all-important water resources. The on-farm nutrient management will reduce nitrate and phosphate pollution arising from agricultural activities, directly contributing to Slovakia's compliance with the EU Nitrates Directive and the country's progress towards meeting the requirements of the Water Framework Directive.
c.	Complete	Assumed to be commercial, as the business of EIB is to invest in European (and other) infrastructure.

Indicator: G4-EC8	**Level of information**	**Content**
a.	In G4 Index, not in report	-
b.	In G4 Index, not in report	-

Indicator: G4-DMA-b Guidance for Procurement Practices	Level of information	Content
-	In G4 Index, not in report	The Bank ensures that its funds are employed as rationally as possible. This requires that the works, goods and services procured for won purposes or under its financing are of appropriate quality, and acquired at economic prices and in a timely manner. This is generally best achieved through an open public procurement process when procuring on its own account, and by open international competition when procured by projects promoters.

Indicator: G4-EN15	Level of information	Content
a.	In G4 Index, not in report	-
b.	In G4 Index, not in report	-
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	-
e.	In G4 Index, not in report	-
f.	In G4 Index, not in report	-
g.	In G4 Index, not in report	-

Indicator: G4-EN16	Level of information	Content
a.	In G4 Index, not in report	-
b.	In G4 Index, not in report	-
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	-
e.	In G4 Index, not in report	-
f.	In G4 Index, not in report	-

Indicator: G4-EN17	Level of information	Content
a.	In G4 Index, not in report	-
b.	In G4 Index,	-

	not in report	
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	-
e.	In G4 Index, not in report	-
f.	In G4 Index, not in report	-
g.	In G4 Index, not in report	-

Indicator: G4-EN30	**Level of information**	**Content**
a.	Not	The EIB does not gather information required by this indicator. The Standard Disclosure or part of the Standard Disclosure is not applicable. The EIB's direct operations as a financial institution do not include activities for which this indicator would be applicable.
b.	Not	-
c.	Not	-

Indicator: G4-EN31	**Level of information**	**Content**
a.	Not	The EIB does not gather information required by this indicator. The Standard Disclosure or part of the Standard Disclosure is not applicable. The EIB's direct operations as a financial institution do not include activities for which this indicator would be applicable.

Indicator: G4-LA13	**Level of information**	**Content**
a.	In G4 Index, not in report	The EIB applies the same salary scale to both men and women. Differences in basic salaries result from the mini-steps awarded in successive appraisals (thus reflecting the number of years of service and performance, irrespective of gender).
b.	In G4 Index, not in report	-

Indicator: G4-SO2	**Level of information**	**Content**
a.	Not	The EIB does not gather information required by this indicator. The Standard Disclosure or part of the Standard Disclosure is not applicable. Impacts on local communities are part of our due diligence and are one of EIB's core business principles.

Indicator: FS6	Level of information	Content
-	In G4 Index, not in report	-

Indicator: FS7	Level of information	Content
-	Not	The EIB does not gather information required by this indicator. The standard disclosure or part of the standard disclosure is not applicable. To date the EIB Group operations do not structure its reporting to meet the requirements of this data request.

Indicator: FS10	Level of information	Content
-	Not	The EIB does not gather information required by this indicator. The standard disclosure or part of the standard disclosure is not applicable. The EIB's direct operations as a financial institution do not include activities for which this indicator would be applicable.

Indicator: FS11	Level of information	Content
-	Not	The EIB does not gather information required by this indicator. The standard disclosure or part of the standard disclosure is not applicable. The EIB's direct operations as a financial institution do not include activities for which this indicator would be applicable.

Indicator: FS13	Level of information	Content
-	Not	The EIB does not deal directly with retail customers via access points. EIB/EIF funding is delivered directly to sovereigns, sub-sovereigns and corporates or indirectly thorugh a range of intermediaries banks, guarantee, microfinance institutions and equity funds, etc. that provide equity finance, loans, micro-loans and guarantees to micro, SME and mid-cap sized beneficiaries.

Indicator: FS14	Level of information	Content
-	In G4 Index, not in report	-

Indicator: Former FS16	Level of information	Content
-	Not	The EIB does not gather information required by this indicator. The standard disclosure or part of the standard disclosure is not applicable. The EIB's direct operations as a financial institution do not include activities for which this indicator would be applicable.

Appendix W

European Investment Bank – Information Reported on the 20 Indicators, Reporting Year 2015.

Indicator: G4-EC1	Level of information	Content
a.	Partially	Staff cost: €68,098,078 Total financing: EIB: €77.5 billion EIF: €7 billion. €18.7 billion for innovation and skills €28.4 billion for SMEs. €18.9 billion for infrastructure. €19.6 billion for the environment
b.	In G4 Index, not in report	-

Indicator: G4-EC5	Level of information	Content
a.	In G4 Index, not in report	-
b.	In G4 Index, not in report	-
c.	In G4 Index, not in report	-

Indicator: G4-EC6	Level of information	Content
a.	In G4 Index, not in report	-
b.	In G4 Index, not in report	-
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	-

Indicator: G4-EC7	Level of information	Content
a.	Partially	In 2015, EIB signed €18.9 billion to support infrastructure projects. Joint Assistance to Support Projects in European Regions (JASPERS) is one of the advisory programmes provided by the EIB that focuses on support throughout the project cycle, from planning and preparation to implementation. This joint EC-EIB flagship initiative remained the largest advisory programme carried out by the bank in 2015, Invested €13 billion in transport links. In 2015, the EIB signed a total of €5.5 billion worth of finance for urban

		development, regeneration and health projects in Europe. Projects that extend electric vehicle charging infrastructure, to install city-wide smart meters and new public facilities that can energise social and cultural life. Investment in secure, competitive and sustainable energy supply for Europe, The European Com- mission has estimated that this will necessitate yearly investment of EUR 200 billion over the next decade, of which about EUR 90 billion per year for energy efficiency. We provided EUR 13.7 billion in finance for energy projects during 2015. EIB sup- port for energy efficiency reached EUR 3.6 billion, an increase of 50% from the previous year. The EIB played a crucial role in establishing the UK's funding mechanism to upgrade an aging school infrastructure. Many of the schools need refurbishment as many are from the post-war era. 12 new schools to be built in North East England. The Bank's participation contributed to securing a successful outcome for the UK's Department for Education (DfE). By providing around 50% of senior debt, the EIB ensured the programme went ahead.
b.	Partially	JASPERS, in 2015, provided project preparation support in 16 EU countries & 3 candidate countries. 97 assignments were completed in 2015 (1,034 since the beginning in 2006). 467 JASPERS-assisted applications for funding for major projects have been approved by EC, with total investment cost of €72.2 billion. Investment in transport links: helping 500 million additional passenger to move. Saved a total of 65 million hours of EU citizens' time during the year. Sustainable transport has a significant im- pact on citizens' quality of life by generating trade, creating access to employment, reducing congestion and subsequently pollution, and saving time. Urban development investment: By enabling investment in more modern and efficient buildings, as well as supporting urban planning and development, we not only help to renew public facilities, but do so in a way that produces a healthier and more environmentally friendly living environment. Energy investments: Investments in modernising energy networks and improving energy storage contribute to securing Europe's energy supply whilst also making it easier to integrate energy from renewable sources for a more sustainable energy strategy. School investment in the UK: Hylton Castle Primary School was one the first new PSBP schools to open at the end of 2015, and the new environment has made a notable impact on students and staff. At the opening ceremony the Head Teacher, Mrs Elaine Armstrong, said that staff and pupils are proud of their new building. The Head is confident that the new building will have a positive impact on pupils' self-esteem, motivation and sense of value.
c.	Complete	-

Indicator: G4-EC8	Level of information	Content
a.	In G4 Index,	-

	not in report	
b.	In G4 Index, not in report	-

Indicator: G4-DMA-b Guidance for Procurement Practices	**Level of information**	**Content**
-	In G4 Index, not in report	The Group ensures that its funds are employed as rationally as possible. This requires that the works, goods and services procured for own purposes or under its financing are of appropriate quality, and acquired at economic prices and in a timely manner. This is generally best achieved through an open public procurement process when procuring on its own account, and by open international competition when procured by project promoters.

Indicator: G4-EN15	**Level of information**	**Content**
a.	In G4 Index, not in report	-
b.	In G4 Index, not in report	-
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	-
e.	In G4 Index, not in report	-
f.	In G4 Index, not in report	-
g.	In G4 Index, not in report	-

Indicator: G4-EN16	**Level of information**	**Content**
a.	In G4 Index, not in report	-
b.	In G4 Index, not in report	-
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	-
e.	In G4 Index, not in report	-
f.	In G4 Index, not in report	-

Indicator: G4-EN17	Level of information	Content
a.	In G4 Index, not in report	-
b.	In G4 Index, not in report	-
c.	In G4 Index, not in report	-
d.	In G4 Index, not in report	-
e.	In G4 Index, not in report	-
f.	In G4 Index, not in report	-
g.	In G4 Index, not in report	-

Indicator: G4-EN30	Level of information	Content
a.	Not	The EIB does not gather information required by this indicator. The Standard Disclosure or part of the Standard Disclosure is not applicable. The EIB’s direct operations as a financial institution do not include activities for which this indicator would be applicable.
b.	Not	-
c.	Not	-

Indicator: G4-EN31	Level of information	Content
a.	Not	The EIB does not gather information required by this indicator. The Standard Disclosure or part of the Standard Disclosure is not applicable. The EIB’s direct operations as a financial institution do not include activities for which this indicator would be applicable.

Indicator: G4-LA13	Level of information	Content
a.	In G4 Index, not in report	-
b.	In G4 Index, not in report	-

Indicator: G4-SO2	Level of information	Content
a.	Not	The EIB Group does not gather information required by this indicator. The Standard Disclosure or part of the Standard Disclosure is not applicable. Impacts on local communities are part of our due diligence and are one of EIB's core business principles.

Indicator: FS6	Level of information	Content
-	In G4 Index, not in report	-

Indicator: FS7	Level of information	Content
-	Not	The EIB does not gather information required by this indicator. The Standard Disclosure or part of the Standard Disclosure is not applicable. To date the EIB Group operations do not structure its reporting to meet the requirements of this data request.

Indicator: FS10	Level of information	Content
-	Not	The EIB does not gather information required by this indicator. The Standard Disclosure or part of the Standard Disclosure is not applicable. The EIB's direct operations as a financial institution do not include activities for which this indicator would be applicable.

Indicator: FS11	Level of information	Content
-	Not	The EIB does not gather information required by this indicator. The Standard Disclosure or part of the Standard Disclosure is not applicable. The EIB's direct operations as a financial institution do not include activities for which this indicator would be applicable.

Indicator: FS13	Level of information	Content
-	Not	The EIB Group does not deal directly with retail customers via access points. EIB/EIF funding is delivered directly to sovereigns, sub-sovereigns and corporates or indirectly through a range of intermediaries banks, guarantee, microfinance institutions and equity funds, etc. that provide equity finance, loans, micro-loans and guarantees to micro, SME and mid-cap sized beneficiaries.

Indicator: FS14	Level of information	Content
-	In G4 Index, not in report	-

Indicator: Former FS16	Level of information	Content
-	Not	The EIB does not gather information required by this indicator. The Standard Disclosure or part of the Standard Disclosure is not applicable. The EIB's direct operations as a financial institution do not include activities for which this indicator would be applicable.

Appendix Y

Transcribed Interview with CSR Expert

Length: 1:04:05 or 1 hour, 4 minutes and 5 seconds.

Interview is structured by the Time Stamp (TS), which represents the start of the comments in the audio file.

<u>*Abbreviations*</u>
Interviewer = IN
CSR Expert = CE

00:03 IN: So to start of with, I would just very much like if you could tell a bit about the project that you worked on for the UN.

00:10 CE: Yeah I can do that, I was actually hired to look into whether it was possible to identify universal indicators that all companies regardless of geography regardless which business they are working with, what that they all can report on and that was the intention and so what we did was that we took the 100 largest listed companies in the world and looked at what do they report on, what kind of indicators, then we compared with what is it that the investors want and we did that by looking at what the ESG raters are looking for and then we compared with the SDGs to see wait if we can look at what the companies are willing to and can report on what the investors really want and what is reflecting SDGs then that must be the super core of what everybody should be able to report on and we have identified 20 indicators that we can actually use for that.

01:16 IN: And those indicators are they mainly i can just say that from my own little analysis that I did on banks I could see that a lot of the indicators that were sort of relevant from an SDG side many of them did not report on them. Is it a certain type of indicators are they more, how do you say, is it, is it more the general ones or do they prefer the economics or

01:42 CE: You could say that the, the SDGs connection is more indirect cause what we looked at 2015 reporting and SDGs did not exist at that point in time and therefore it is a matter of what they reported on and then comparing and say where does this fit with the SDGs. So its the other way around.

02:09 IN: Ah okay and did you actually see that there was a connection or

02:13 CE: There is a connection, yeah, but but you can say that in many cases, it is a bit fetched, far fetched, cause many of the targets, the underlying targets of the SDGs, are not necessarily related to companies. So you have to tweak them to actually make it work. They are actually more directed to to governments the way that you would report for a country.

02:41 IN: But I guess that was also how do you say the initial intention was that it was and also the way that they implemented it is that they do it on on a sort of a country base.

02:49 CE: Yeah

02:49 IN: Then it is interesting that it also seems a bit to me when you look into it, that this link kind a came and maybe they had a bit of an aha moment of course we need to have business in but they haven't really sort of tried to how do you say tailor it more to business' needs.

03:07 CE: No, no they haven't, they haven't tried and not really sure either that is really what is needed. As you can see that many companies are using the SDGs, but they use them in a different way than UN potentially thought. At least last year, I do not know now. So, you can say often what, its early days, so we have only seen one year of SDG reporting. And as you also started by saying some are doing it, some are not doing it, but what most are actually doing is that they take the logos and then they scatter them around. I have yet to see any companies who have actually changed anything that they measure and say okay now we want to measure this because this is what they state in the SDGs, that is not how it works. Where what they do is, that they take what they already report on, what they already have of indicators and then they look into the SDGs, okay where does this fit. So it’s the other way around. It sounds nice but is not how it’s done.

04:18 IN: I was about to say that's also my experience from the few reports that I sort looked into is that they, either they just have a page saying that we support the SDGs and the intention and very few of them actually go as far as saying these SDGs are relevant for our businesses. But that is as far as they will go.

04:35 CE: Yeah and then they only do it on the 17 SDGs, they would never go down to target level.

04:41 IN: Yeah exactly, I, none of them even mentioned target level its only this SDG is relevant for our business and they give some sort of general description why and then they kinda leave it at that.

04:52 CE: Yeah, I think the most advanced I have seen is, is some companies have tried to make a chart where they state, okay, what is impacting our company and where do we have impact and then they put in the 17 symbols for the SDGs and then they based on that define which SDGs that they will support but they already supporting it it haven't changed a thing if you ask me.

05:21 IN: So would say that, how do you say, the interest is not very high.

05:25 CE: The interest is super high!

05:27 IN: It is high?

05:28 CE: The interest is super high, but its not drilled down to what we measure.

05:33 IN: So do you think its a bit because they simply just don't know how to work with the SDGs or is it is it they don't really want to make that investment or

05:43 CE: It's because most people who know about the SDGs are non-financial people and that means that they are not very keen on measure things. So they are very much into telling a story ooh in Uganda we did so and so and so and then put in a nice picture and that's more or less it. So to actually measure something that will require that they have a robust setup to capture the data and in most cases they don't and often what they do is that they take what they already have of data and then they try to fibble it in.

06:24 IN: So it seems more that it is simply because they don't have the how do you say, the processes to capture this data and they don't really the necessary how do you say they don't really have the motivation to actually start collecting this data or.

06:38 CE: That is very lightly right cause what you see is also that for many companies who have done CSR reporting for some time and most companies in Denmark have done this since the law in 2008... 9ish and that means that they have now had almost 10 years and they are usually not allowed to expand their report, usually it is cut down and they are usually not allowed to expand their amounts of indicators that they are measuring. Because that costs money simply. So usually what they do is that they have this set of indicators and then they measure that full stop that's what they do.

07:25 IN: and I could, I would assume that what they measure is kind of what is relevant to their business I mean, I've..

07:29 CE: Maybe

07:30 IN: Yeah I, maybe of course, I read a study that it's mainly that you have companies that are, how do you say, the most exposed industries

07:43 CE: That is what they are in theory suppose to do. In reality, they provide the data they have.

07:51 IN: And that is very..

07:53 CE: That can be everything, usually in Denmark we report enormously on what I call the SLAG, that would the social indicators because we have such, because we are reporting already to the Danish Statistical Office. So we have that data already, so they do that.

08:10 IN: So do you, how do you say, could you imagine that in the future there could be some reporting in these areas and how could that sort of happen, if you know what I mean, if, how do say, like one reason could be that, how do say, the implementation of the SDGs, the awareness of the SDGs increases there could be some stakeholders that would be interested in actually getting these data from companies.

08:39 CE: Who should that be?

08:42 IN: Yeah that's a good question, because what I was thinking is that you have either trying to, how do you say, raise the awareness of the SDGs at least among the populations, so I don't know if that could sort of trickle down and then in that sense

08:58 CE: I don't think so.

08:59 IN: No you don't think so

09:01 CE: **shakes head** says no.

09:01 IN: So there wouldn't be how do you say any impact from civil society in that sense

09:09 CE: No.

09:10 IN: No.

09:10 CE: No. What we see right now is if we look at who are actually reading CSR reports as of today, there are three readers, students, other CSR people and ESG raters full stop nobody else.

09:27 IN: None, no investors no

09:29 CE: Have you ever in your life or have you ever met any person who were to buy a TV who started by saying I need to read Sony's CSR report. It doesn't happen. What you you look at, what can it do for me, what does it costs and where can I buy it. And that is how consumers work.

09:50 IN: But if its only students, other CSR people and the ESG raters then why are they even interested in reporting to begin with.

09:57 CE: because 10 years ago, there was this perception that this would be a really good, as a promotion to the customers. Thing is, customers are really not looking at it.

10:12 IN: So they are not, how do you say, important enough, or they they don't.

10:16 CE: They are fully important, but that is not how you communicate with customers. Customers do not read reports, so that could part of your marketing material that's another story but its not part of the CSR report. A CSR report is just like the annual report and actually it is part of your annual report it is for the investors that's what it is.

10:37 IN: So mainly the reason why companies are reporting at least in the Danish cases because of the law. Would you say

10:43 CE: In many cases yes.

10:45 IN: Okay, so maybe there should be some sort of similar maybe not necessarily like an actual law but if you really want to implement the SDGs into this, should we take some sort of similar steps or if you can follow my train of thoughts.

11:04 CE: depends on what it is we want with it because in reality if what we want is for the companies to change then potentially what we should do is to ask the authorities to measure other things than what they do today. Because that is happening then you will see all the companies are reporting, the moment we have the legislation as we have today, comply or explain, then you will see that the companies who are in C20 and large CAP they will more or less do it and then no more. So its only like 25-30ish companies in Denmark who are reporting and many of them are not reporting well, in their own mind yes super well, but compared to international reporting its not very good and often what we are not reporting, is actually on the governance side and that is very didn't reported and is not part of the CSR report.

12:11 IN: And I guess that is also what the investors are mostly interested in.

12:14 CE: That is what they want. Yeah Yeah. So it's really outstanding bad.

12:20 IN: But its seems like it's a lot of effort to go through for you know for producing something that is not really useful in the end.

12:27 CE: Ja (yes).

12:28 IN: So, so basically if we want to, how do you say, work with the SDGs, we need someone higher up, as in the government or the state should start, how do you say, setting the direction.

12:39 CE: They should start by defining what kind of indicators they want to be measured. Then they should also notice that it's impossible to make geographical splits of many indicators. Making geographical split of CO2 is ridiculous. Most of the companies who are really polluting a bunch would be cross-border activities, like shipping, flying, drilling rigs stuff like that they can move and where do they pollute? Nobody knows. And then that is some of the problems that we see, that many of the laws which are made on this are not really taking care of this cross-border activities. But those are the ones, the transport sector, is one of those who are polluting the very most, but you cannot make separation of country and as long as they haven't made any rules for that, where does it belong? If you have a truck driving from Copenhagen to Barcelona, and it drives through Germany and what do we have, where does the CO2 belong? Is it in Denmark? Is it in Barcelona? Is it, if the customer is in France, is it their(s), is it with the owner of the truck because they may not own it in Denmark, it could be in Poland, it could be the driver, it could be, nobody have defined it and that is one of the problems.

14:07 IN: And, I mean, I worked with the GRI framework and it is not really defined down to that specific details and I guess, if you wanna, if you wanna, how do you say, from a government perspective define that is also very tricky because first of all, as you say, it's, you can't really do it on national level you need more of a global consensus on how do we this and you can see that GRI has kinda worked as a bit of a, how do you say, alternative to sort of the global legislation, but there are still a tremendous gaps.

14:40 CE: Yep.

14:42 IN: So what you would assume is that if you really want companies to take of on this there need to be some sort of global pressure from.

14:53 CE: In my view and this is not to be rude on GRI, but in my view if this really should go anywhere, it should be IASB, those who are making the IFRS rules because then all companies who are using IFRS also will have to do this and that means that all companies potentially outside of US will do it according to IFRS. And then suddenly we will have it. Trouble is IASB until now have said, yeah we think it is important but we won't do anything about it. And that's the problem. So if for instance, the EU were to do anything drastically, would be that they put pressure on IASB, then that would really work. Then we have something to work with, but for now, nah. In Europe actually, we see that GRI is used less and less and that was also due to G4, which many companies found very complicated to use, we can see that GRI in US is not very much used, it's actually very sort of popular in Asia, but it's very defined by geography and that is a problem. So we need to have more standardised ways of working on the indicators. Then you can argue should it be like what SASB is doing where they define per sector and i am not sure about that maybe, maybe not, could also be in my view that we should have a minimum set of say indicators that everybody are reporting on and then based on your materiality analysis, you can add as extra indicators that works for you. Could be. Just like you woulnd't make financial analysis of milk producers and a lawyer firm that would be crazy, you don't look at the return on invested capital from both of them, because that is not comparable.

16:59 IN: Yeah of course.

17:00 CE: So so in my view, it would be very helpful if IASB would step in on the scene, they have the super master key here.

17:15 IN: Do you think that is because they have more sort of credibility with companies or because their IFRS how do say, framework is the most used within financial report and then it makes most sense that it is also them who kind of defines the principles for the other side.

17:32 CE: Yep, plus it will activate the financial people. Some of the problems that we see a bunch with the non-financial reporting is that the data is of extremely poor quality, it is consolidated wrongly, it is not audited, if it is audited it is on limited level, the data boundaries are crap, and they can even swift from year to year, potentially also from one indicator to the next indicator. It is ridiculous. It can't be used for anything at all. You cannot compare with the revenue, you cannot compare with cash flow, you cannot compare with anything, cause the data quality is very poor.

18:16 IN: So it's a question about, how do say, triggering the professional pride of the financial people.

18:21 CE: Yes, yes. Because what we need is actually the financial and non-financial people cowork and its not because non-financial people don't want to make it right. They really do but they don't have necessarily the tools to do it. And the financial people may not know all about CO2 and how to measure this and that. But if they combine their skills then suddenly you are really really well driving. Cause then you have the vehicle, you have the bit, the key, you can do stuff and you can get out to the furthest subsidiary you may have in Kazakhstan and you can do it for free cause it is already there, the systems are already there and that is the trick here. What we often hear is that the non-financial people are not even just remotely connected with financial people. So they have to start from scratch and that is expensive obviously and that is also one of the reason why they are so limited in what they measure. Cause now they have this and it sort of works for them at least they have found a way of muddling through all the crazy shit they get and that is what they do.

19:33 IN: That is actually quite interesting cause that is also what sort of looking through the reports that I've been looking through is that even though that you actually have GRI's guidelines prescribing a more quantitative method of measuring certain indicators most of them actually they don't do that. Then they give some sort of qualitative data where they actually yeah they tell a story about what they do and their efforts but they don't actually provide any concrete data So its the whole, how do you say, standardisation or normalisation of the data that is kinda the missing link.

20:06 CE: Yeah, that is what we are missing. It is also a matter of that the CFO accept that we spend time on this and to be able to persuade the CFO of this you have to have a good business case. And the business case is that the company can actually predict that they may have a risk profile that they need to work with that they may have some opportunities that haven't used yet. But as long as the financial people and non-financial people are not talking to each other that business case will not be made.

20:44 IN: That makes a lot of sense. Especially in terms when you talk about risk I could imagine that sort of the risk of this actually becoming legislation could sort of wake them up a bit.

20:56 CE: That is of course one of the strongest tool but you can actually also see ehm if you are depending on getting crops in your, if you are a manufacturer of some sort, if you are depending on transportation, if you are depending on weather stuff like that then right now we see a lot of wild weather we see floodings we see also wildfires more than we have seen for a long time. Given all this, that is risk and that is also financial risks but since this two sets of colleagues are not talking to each other then the financial people will not really realise ops we have a risk here we need to take care of. It could also be that some of their assets should be written down cause they may be flooded in five years. Could also be if they have trucks and they are not allowed to drive into the city center of Paris and that is where their customers are then they have a massive problem.

22:01 IN: But then even lets say that you now, now you say that now you have a business where you depending on crops for example and you are dependent on the weather then that also sort of entails some sort of collaboration across sectors.

22:12 CE: Yes.

22:13 IN: Because everybody pollute, you know, contributes to global warming, I mean it is not just the agricultural sector.

22:19 CE: True. Actually that goes also for the service provider, so it is not just for the manufacturers it's also the service providers they may have a building at the harbour which suddenly may have an in-built swimming pool they did not plan for. I can tell you that is not funny and they will, and that will be expensive and that will be expensive for the company itself but it will also be expensive for the insurance company who have that company within their customer range. So for many many many companies this is important and for the investors it is also important, but they have yet to see it.

22:57 IN: Then another question could be could it that companies are just, they don't, how do you say, they are not that long-term oriented.

23:09 CE: It is so that in many cases the risk profile that you work with especially when you make provisions and contingent liabilities is usually maximum five years then it goes beyond what they can actually work with and many of these risks we see are potentially in ten years time, twenty years time and that could be some of the reasons why we don't see a lot on it yet. But some of the legislation could hit them faster than they actually think.

23:45 IN: So actually that could be how do you say a motivation for them to actually look further than the five, ten, twenty years sort of span.

23:55 CE: Yeah because that would, it will speed it up. We saw it a couple of years ago when some of the harbours especially in the USA they made restrictions on how much NOX the vessels were allowed to pollute when they go into the harbour. Then they go on to another motor and that uses NOX and that had a tremendous effect on that they had to change the motors, they had to change the bunker they bought, they had to change a lot of things that was expensive for the shipping companies. So yeah it does have an effect.

24:33 IN: So how do you say, legislation is an option, but maybe not necessarily that you directly sort of make any laws about the reporting but it is more that you..

24:43 CE: It's a ramp. It will make you, it will make the companies muddling and do it within fairly short time actually.

24:52 IN: and then sort of you can say all the sort of the standards the everything else that is sort of needed would follow as a result of that as you say you would have the financial people talking to the non-financial people.

25:04 CE: Cause they need to know how much NOX do we actually emit, oh it's a lot, so we have all these old vessels they are polluting a bunch then okay what the heck are we to do, are we to sell them, are we to write them down or what are we to do.

25:21 IN: Interesting. A bit surprised by that because when you sort of go through the all the literature that there is on this, ehm, because I am using institutional theory as sort of guiding my analysis for this and many of them actually argue that is sort of the normative pressure that the whole professionalization is sort of has been the key driver and then you had you know a couple of these kinda follow because they of course they, they don't wanna miss out, so they follow the big companies that are starting to report on this and kinda just do whatever they do.

25:57 CE: I think it is right that many companies just do what the neighbour is actually doing so. I am not sure the, you could say, the revolution is actually coming from the companies themselves. It will have to have some sort of pressure to do something else. And one of the pressure could be that you change the legislation of how much are you allowed to emit. And what kind of emissions are allowed. If NOX is not allowed then suddenly something should happen. You could also see it in Denmark, we got this, that the legislation on NOX was deemed not allowed by EU, then the few years it was there, it had a tremendous effect.

26:45 IN: Interesting. So the whole, I mean obviously you know about the whole EU Directive and what I found was quite interesting is that they actually mention the SDGs and it's inspired by, so do you think this could have an effect?

26:58 CE: Yeah they have to mention it, cause it was there. We cannot underestimate the SDGs from a political point of view, but for the companies, it is not very important. They can not stand up and say, we don't give a shit, that is not going to happen, but it is not gonna to change their ways of behaving, it is really not and then they will do what we have also seen this year, they will take in some of the fine logos and then they will do, we are supporting the SDGs full stop that is what they do. I don't foresee they will do more than that.

27:40 IN: That is very interesting. Because then it just becomes another logo to them for them to put on and sort of verify their reports. It is also quite interesting when you mentioned the whole, like that they have external auditors to look at their reports because all of the reports that I looked had, actually had external assurance, I mean it was limited, but still none of them, you know, said, like all of them said there is no reason to believe why like what they have reported isn't true, but then when you actually look deeper into it, you see that they actually don't report as they say they do when they say we report using the GRI G4 guidelines in the case of my analysis. So they also kinda act as a, as a logo, as a sort of validation tool.

28:29 CE: They sometimes do. You will also see that often what the auditors are signed up for are potentially only specific pages in the report. It's not the entire report it's only some of the data, it's only this side and then potentially this case story and then full stop that is what we have been assured for and then rest is just hoohaa.

28:53 IN: So maybe, also what could be interesting to look at is, to maybe have some sort of guidance or more rules, maybe even some legislation on how you actually conduct these audits, if they should be more.

29:09 CE: That is a debate we have right now actually, the International Audit Agency the IAC, we talk about this but since almost all 98-99% of all assurance statements which are made, they are made limited. There are very few reasonable level assurance statements and since you don't have to state something positively when you make a limited review, then you only have to make a negative assurance statement as you say there is nothing that had come to our mind that makes us believe this is not the truth. It is something completely different to say this is the truth. That is another ballpark that is not the same and that will demand that companies actually shift gear on the, especially on the data, on the non-financial data. So they actually use all the tools they use for assuring their financial data, they are reused again on the non-financial data. And they can, I have heard some claim, it is so fluffy, no. You can get really good evidence for almost all kinds of data, it is matter of having the right processes, it is a matter of making sure where to pick the data. And the trouble is today that many of the companies, they reuse systems, which are not used for group reporting, but then they have the data and then they will use it. For instance when of the most reused systems is HR-systems. HR-systems that is Human Resource systems they are made so that the HR department can have development conversations with white collars and that means that all the hourly salary blue collars are usually not included that means that all the jointed operations are not included, it means that the data is consolidated wrongly, it means it's not audited, there are so many bad things about that, I cannot begin to, it's outrageous.

31:26 IN: I mean that system is not, it is not for that use.

31:29 CE: No no, it was, it would have a completely different purpose when it was made and it works super duper for that and then some non-financial people they see the data and they think, it is for the entire company and the HR people who do not know anything about data discipline they say we cover the entire company, which they do not.

31:51 IN: Yeah and I guess until they actually have some sort of reason to start investing in a new system they are just not going to do it because the business case is not there yet.

31:58 CE: Yeah.

32:00 IN: Interesting. So I guess beside let say the whole legislation thing, it is a question of also getting these two groups of people to actually meet and talk together about how they can, and then I guess it is also making a business case for the financial people as to how....

32:15 CE: Yeah they need to understand, why am I doing this, cause if you talk to you could say ordinary financial people they will still think this is some hippie shit. And some will say it more loudly than others but if you really talk to CFAs and stuff, many of them will quietly say this is hippie shit. And sometimes they are right because the data is really poor.

32:44 IN: But I guess they don't really see that actually they are the ones that are solution to this sort of....

32:50 CE: No, no, no, no, they don't see that. No no. So what we have to do it actually to make them see that there is some business in this, there is actually something to be gained from having this insights on the companies and be able to compare one company with the other company so that we don't just have all these stories and nice pictures and stuff, but we actually have data so we can actually compare all these companies and say okay which one of them are performing the best, which one of these have changed their fossil fuel use and stuff like that.

33:29 IN: But I guess that is also difficult to actually, first of all to convince them to invest in this because it is a massive investment and you are not really sure whether you are gonna get that, you know, back, if you know what I mean like...

33:42 CE: True and you will see there is a difference. You see institutional investors they will understand this, they will not necessarily understand it from an investment point of view, but they will see it from the customer's point of view because what you see is that pension funds for instance they will often have customers who are interested in that they do not buy shares in mining and what do we have and for that reason they do ESG in some shape or form. Most of them are just doing what is called a negative screening. They define what are we not to report or to invest in and that is probably this, the weakest form we have. Because what you do then is that all the retail investors that will be those who are not institutional investors, they don't care. And since the institutional investors do not invest in mining, lets say that, then they have made a bargain for the retailers, cause the income is still the same. So what we should see is actually more positive screening where you will see that the institutional investors are actually boosting the share price of those companies who are performing well. That is a whole different ballpark, but we don't see that a lot.

35:12 IN: But I guess that is again due to the lack of data.

35:15 CE: Yes and that boils back to the poor data, yeah it does.

35:21 IN: Interesting. Eeehm, I actually think I more or less covered a lot of the concern that I had. Eeehm so sort of going forward what you argue for is that it has to be a global effort, you cannot have the whole national thing

35:41 CE: No. I don't see it.

35:44 IN: But then I would assume that going through lets say the UN, I mean, and other institutions like that, that is not gonna happen either because it's all more or less based on a voluntary basis or do you actually think that the UN could sort of...

35:56 CE: UN cannot do anything. No. They can point at it and say we ought to do this and then all the companies say yeaaah and? So we need to have some pressure on IASB, in my view that is the only way. And you can see it actually also now with, I do not know if you know it, but TCFD, Bloomberg under Financial Stability Board last year was it, two years ago, right after the Paris agreement, the Financial Stability Board with G20, they made a task force where the chairman is Bloomberg and he also took James Carney from the Bank of England with him and they have a lot of investors in that group and they are looking into what do we need of information from the companies so that we can actually support especially, the CO2 reduction. And what they pointed at is exactly what I also told you today, is that we need to know what the real risks are, we need them to make scenario analysis of the financial risk. So what, when you see a CSR report today, it's often about the companies impacting on the society, what the investors want, they want to know what is the impact on the company, what is the value impact on you and that could be both positive and negative but they need to know what is the value impact on you guys.

37:29 IN: So actually, we need to turn the tables around.

37:31 CE: Yeps.

37:34 IN: Yeah that actually makes a lot more sense that and then of course because then you will engage probably the most important stakeholders of the company the investors and they can, you know, if any stakeholder actually put some pressure on the companies to invest in this data system.

37:50 CE: Yeah, so what we saw, they came out with this recommendation this summer so it hasn't really materialised yet. But what we saw is actually that we are now based on this very very interesting recommendations set we are now a set of people who are working to try to make Bloomberg and Carney and some of these hot shots to work on IASB since we cannot make EU do it, then we have to make some of these hot shots do it cause we will have IASB to change, they will have to take this in. And it doesn't take a lot because they can use the existing financial rules, what they should do is simply go in and say okay when we write down on an asset we should also take of what is the environmental impact on this asset's value. So we are not to try change or make a completely new track or something just tweak it a bit or add something or make a new appendix or something, so that is what we try to do.

38:57 IN: So basically actually we need to price the externalities. You have to get a lot more focus on that, that there is not just like, the, how do you say, the financial costs but there are other costs, that we need to consider, but that is I guess, it is more difficult to actually engage the financial people.

39:12 CE: Yeah that is difficult for them to understand, so it might be that you figure out what externalities you have but given the thought of now you know the externalities then what is the value for the company based on that externality. Does it meant that you cannot get your raw products for your product, potentially or should we swift in the way that we produce them, potentially.

39:37 IN: So here is actually, how do you say, the impact should not necessarily be a certain amount, but it should be more in terms of what impact will it have on yeah supply chain.

39:47 CE: Yeah, they should consider that and then what they, and they do that already today is that they should make a risk analysis for the investors and say okay if the water is rising with X meters then the impact on our company will be X amount pr. share. Da daaa!

40:10 IN: Yeah and then you have the magic form, will you just give me two seconds.

The interviewer needs to find a plug for the recording devices - this part does not contain any information related to the thesis, so it is not transcribed. Min. 40.15 to 40.41

40:41 IN: But I guess it is all about getting to that magical number.

40:45 CE: In my view, in many other people's view, it is very important to have all these case stories, I am just not convinced that it's changing anything.

40:57 IN: I mean if you talk about reporting, it makes sense that the focus has to be on the financial, because that is how you can actually get the right data and get some data that has meaning in terms of actual impact and actually get them to sort of, yeah behave the way that we actually want them or do you know what I mean, like work against the SDGs. Of course a marketing person or sales person would be interested in the stories because that is what they can tell customers but in terms of like...

41:29 CE: and then it boils back to what we talked about in the beginning. They potentially still have the conviction that the customers are reading their CSR report. But we have no evidence that is happening at all.

41:44 IN: I would also hardly believe that a customer would read a 300-page report on everything that they do.

41:51 CE: I really have yet to see it.

41:54 IN: And then I think that then also maybe the report is not even right, yeah as you say the right media.

42:00 CE: That is not the right media cause what if you really want to know something about a company then you will go to the internet and you will or you would have some magazine ads or stuff like that. If you take a company like H&M, you, at least until they had the scandal running, they had a really big ad on that we should take care of the environment and they would reuse the clothing and lalalala. How do we know that? Not because we have read their CSR report.

42:38 IN: And I guess that the people are aware of that, or at least in countries for example like Denmark, we are highly aware that, how do you say, what we get from them, we need to sort of, look at that with a certain amount of scepticism and that they don't have that much high credibility but that is, I could assume is also, an, how do you say, a consequence of them not being willing to disclose anything negative.

43:04 CE: Yeah.

43:05 IN: So the whole transparency focus there has been, has only been sort of one-sided only on the positive.

43:12 CE: Yeah, we see that a lot in all kinds of CSR reports that they, I don't know if you saw the analysis I did for FSR the auditors in Denmark of the reports that we did in total of, in Denmark, and one of the things we saw was their that companies in general are not very good at explaining the development. What they are especially bad at explaining if they have a decline. So if they suddenly are polluting more than they used to pr produced unit they are not explaining it, they simply ignore it and then they hope that nobody will see it. That would not happen financially that would simply not be allowed, you have to explain all your developments and since nobody is actually asking, then they can get away with it.

44:13 IN: But I guess that sort of boils back to the whole issue of the right stakeholders are not engaged in this.

44:18 CE: Absolutely, absolutely. But it also for instance boils back to the journalists. If you are a business journalist then you have the possibility also to read the CSR reports, but I have yet to see one who does that. They don't.

44:38 IN: I guess also, I could imagine that many of them, they, I mean you can easily get lost in all the information that they do report on

44:46 CE: yeah.

44:46 IN: And also from my experience is that you can often look into their, when you, I mean these are just the GRI reports that I looked at, you can see in their sort of Content Index that oh we report on this on this page and then they don't, but then if you look through it, you can actually find some information that is related to that but it is not necessarily something that puts them in a positive light,

45:08 CE: true.

45:08 IN: so they do try to sort of like, like they disclose it, so I guess they can claim the whole transparency thing, but then they are not very open about it.

45:16 CE: No. It is not on page two. Absolutely not.

45:22 IN: So I guess the whole thing is that we should try and see if we can, if we could actually pressure through IASB, that would be...

45:32 CE: Yeah, that is the trick here. Because then you will get a whole set of, also, some standards for what is good data. You will also get some standard for some, you would say humbleness when you report. You are not allowed financially also to brag about stuff that you cannot prove. I have seen tonnes and tonnes of reports where they put in unsolicited claims and I am like okay, you claim this and where does this stem from, nobody knows, it is ridiculous.

46:11 IN: Yeah that is also my experience is that they will tell about this, but then they don't really provide any, they don't provide the, first of all, if they actually do use some sort of quantitative method to report, then they don't report where they actually have these numbers from.

46:25 CE: And if they do, yeah that is one of the problems. And some of the things could also be that they potentially only give you, the relative data. I have seen, especially in many of the large ones who have a large history of doing this, they only provide you with the relative data and that is not necessarily what you wanted, cause you want the raw data to be able to your analysis and compare them with their peers. And that is also a problem, so and that you never either do financially, you will have to, you can make the calculations and make interesting relative data, but you should also provide the raw data so that the analysts can make their own analysis.

47:12 IN: And I guess the whole, if you look at it from a financial perspective a lot of the sort of previous scandals has sort of standardised the financial reporting to a point where they actually have to report on this

47:22 CE: yeah

47:24 IN: and then you could sort of argue that we need some sort of similar scandals which we are kinda seeing now with all the natural disasters if that could sort of shake them up or at least the investors and the...

47:36 CE: You can say that it's, lets take one scandal which is really bad, the Volkswagen, what they did not do, actually if you see their CSR reports before the scandal, then it was very pink and fantastic, but if you then moved out of the CSR report and looked at the what is called the proxy statement you could actually see that their governance set-up was piss poor. So it was actually possible to see that something is not really right here, in the way that you govern this company but it was not in the CSR report and it was not in the financial report.

48:24 IN: That is also another thing that I sort of noticed is that they will produce CSR report but they won't put all the information in one report, they tend to then refer to either the annual report or they can refer to some other..

48:37 CE: There are always a range of things, yes. And the trouble is that is not very reader friendly. It may sound like ooh we are making reports for each and every individual reader, eeh okay then I will have to jump around in all these different reports and I would say we also have some in Denmark who are making very slim reports and then they have all kinds of URLS in these reports, which are not precise and then you will have to figure out now I am in this page and there are 600 things to look at, where is this? And this is where actually the Danish authorities they have actually stated in their guidelines for if you want to use URLS, they should be absolutely deep, they should be precise and they should stay there for five years, cause that is the legislation. And they should enforce it.

49:39 IN: I guess then that is another perspective of it, that even if you do make the legislation the one that sort of been made has been more of a soft kind, you know like, we would like to push them, but we don't actually have any sanctions.

49:51 CE: True. True.

49:54 IN: But then that is another question sort of how can you sanction that because there sanctions when it comes to the financial report but not this.

50:01 CE: Yeah, but you can actually say that ehm, some of, some parts of the Danish Statements Act are actually mandatory, you have to for instance report on human rights and many companies do not. The trouble is today we don't know what the sanction is if you don't it. Cause nobody at the Danish Business Authorities have ever looked at it.

50:37 IN: So is that a question of them not having it defined as in they should define it or is it just because it's never really been an issue, no one has ever reported a company for not doing it.

50:49 CE: It's a combination I think. I think the Business Authorities are very much focused on that the companies apply the financial rules. Then you could say oh but many of the financial rules also apply to the CSR report because it is in fact part of your financial statements but then in some strange way it disappears in their radar.

51:20 IN: Yeah and I guess if there is not like a third party that is trying to sort of push this through, if the investors they don't perceive it as important then why should they start looking into this.

51:31 CE: Absolutely true, absolutely true.

51:34 IN: So I guess it's also, one thing it's about getting the right stakeholders engaged and then also getting them to see the value of this.

51:43 CE: Yeah. But I know that the Danish Business Authorities they are currently looking into 99b, that on the, equal diversity, the diversity rules and I think that is because it is fairly simple compared to 99a which is long and complicated, 99b is simple. And it is easy to see, did they report and is it within the lines of what they were supposed to report. 99a is enormous and it takes forever to go through one report to be sure you have actually covered it all and it is resource demanding and if nobody is asking for the validation, nothing is happening.

52:37 IN: Interesting, so you would say again that it should be the IASB that should engage the right stakeholders and then we would see the..

52:45 CE: Then we will also see the authorities go in and say ah okay now you are not following IFRS, you have a problem.

52:51 IN: So I guess it's the whole making the jump towards to financial part of it that it is no longer just the thing that marketing does, it is actually integrated more, it is embedded more into how we do risk, how we do yeah our, how do you say, yeah like the financial side of it, that you just don't think of it as a nice story to tell your customers.

53:14 CE: Yeah and many companies see it that way still. We must say. And we also see companies who do not care. They do not write it... A couple of years ago, we had one of the companies in the Danish, actually one of the banks who said, clearly stated that they didn't wanna do this. We don't have that anymore, but we have many many poor reporters. We see bank reports, I don't know if you saw it, I was one bank report where their environmental initiative was that they now use a certain kind of cleaning. And I was like okay super.

54:02 IN: And then they don't have the data, to sort of I don't know, like back it up with.

54:06 CE: No no no, no but but. And most of the Danish banks are not concerned about anti-corruption, which is ridiculous given all the cases in the press.

54:20 IN: Yeah, I was just about to say the case with Danske Bank and the whole thing there.

54:23 CE: And they did not report on anti-corruption.

54:27 IN: That is very very interesting.

54:28 CE: That is very interesting.

54:30 IN: In connection to that bank is they have this very nice sort of, how do you say, investment ethics code of conduct and then what they do is that establish this, how do you say, other company, I don't know if you heard of it, June..

54:43 CE: Yeah.

54:43 IN: And they actually discovered that June is investing in like these certain types of bombs.

54:49 CE: Yeah

54:50 IN: Yeah and then you can kinda circumvent the rules which...

54:54 CE: You can do that because they, June is made on what is called ETS that is a pile of shares and if you are digging that step further down and see what kind of shares is this, then the negative screening that they do is really not worth anything.

55:15 IN: Yeah of course if you, but it also seems like it's a bit of a deliberate, you know, try to sort of circumvent it.

55:21 CE: I don't think it is.

55:22 IN: No you don't think it is.

55:23 CE: No no, I don't think it is. I think they don't give a shit.

55:28 IN: Interesting. So basically the whole notion of CSR reporting or just CSR in general as being something voluntary, we need to step away from that more and try to make it more...

55:42 CE: We should make it leaner, smaller but more quality. Stop putting in crazy pictures of, what do we have, it's crazy big. And all these stories, they are allowed to all stories on the internet or marketing material, what do we have, super, go for that. But the investor really doesn't care to hear about what you are doing in Brazil, if Brazil is two per cent of your company.

56:12 IN: Interesting. So the whole thing is actually that we need to sort establish CSR as a financial practice, if you know what I mean, and not as a, something nice that we do and how, what the company is doing for the world, in terms of that, but more on how does this actually affect our company and that understanding doesn't really seem to there yet.

56:33 CE: No that is missing completely.

56:35 IN: Do you think it is either because they just don't see it as relevant or that they just don't understand it?

56:43 CE: Both, both. There might very well actually be, especially some the of the larger companies who have done this for some times, do understand the need for it, but right now, do not necessarily know how to do this. Because there are no guidance.

57:07 IN: Of course and then it would make sense if you have the IASB, which is the, how do you say....

57:13 CE: And you would know where to look up, okay paragraph 97 then we are to do this, we do this. And then you can say, but that is tick-boxing, yeah what is wrong with tick-boxing? That is nice, you get super duper data, with tick-boxing.

57:30 IN: And you can still have the other thing, one thing doesn't rule out the other.

57:34 CE: Exactly.

57:35 IN: It is just about having the data, having the validation and having the....

57:38 CE: So we can actually see, okay you did all this in Brazil, but the impact is yee high, it's of no importance, so maybe we should not spend our time focusing on that.

57:51 IN: yeah, I agree. And what was actually interesting, I did a semester in Australia during the spring and one of the big sustainability cases there is, I don't know if you heard of it, the Adani coal mine?

58:01 CE: Yeah, I've heard of it.

58:02 IN: You've heard about it.

58:03 CE: It is really interesting to see, what the outcome will be, there hasn't been a verdict yet, is there?

58:09 IN: Actually, oh well no, not a verdict on the court case, but what has been quite interesting is that they have actually pressured the four major banks from divesting into this mine and not giving a penny to it and they actually succeeded with some of them and then the latest news is actually I saw this today is that the premier of Queensland, they just had the election for the state, and it went to the Labour government and they said that they would not fund this mine that was actually one of their, how do you say, promises. So as of now, it doesn't look as if it is going ahead, but you still have the sort of the federal government who is pledging to this. But it is quite interesting to see that the banks has sort of been in the shadow for a while because they don't have the sort of direct impact from their, I mean they can easily say that oh we convert all our offices and we try to make them as CO2 friendly as possible that is not really where their impact is. It's the whole investment portfolio.

59:13 CE: Yes.

59:14 IN: But then how do you even start to measure that and then that is where you should start looking at some more financially oriented guidelines to actually drive that through.

59:27 CE: I think if right now TCFD the Bloomberg initiative if they get traction as they wanted, then they also want the financial institutions like the Australian banks to actually report on they have provided certain indicators that they want the financial institutions to report at, and I thinks its more than 100 banks by now who have signed up to TCFD. So in time, but they need of course the underlying non-financial companies, ordinary companies, to report before they can do their reporting. So we have you can say a staircase, so the ordinary companies have to report and then the financial reporting on how well they invested will come. But it takes some time.

1:00:13 IN: Yeah of course, I mean it makes, sorry I am just gonna have a, it's still. Yeah of course, I mean one thing is that you want them to report on this but then they are dependent on getting their data from others and even, because one of the indicators that I look at from the GRI framework, is actually the ones on CO2 and they do state in their sort of sector, you know, additional guidelines, that banks should try and report on this or give estimates but even just the language that they use in the whole report is just, oh if you have it, you can put it there but it is not really a requirement but it seems quite silly when.

1:00:52 CE: I don't know if you are working with that in your report but especially for the banks there are all the equator principles that are actually being used quite a bit in Asia, especially the Asian banks are reporting quite nicely on it and that is some of the things that for instance Danish banks are not doing at all, European banks in general are not reporting like that and some of the things that they are looking into is what are we lending out to, what kind of projects are we lending out to, is it polluting initiatives, is it non-polluting, what is, all these categorisation of their lending activity and that is also part of the TCFD. And that is interesting, I don't know if it's it will rock anything, but lets see about that.

1:01:47 IN: It is interesting to see that Asian, like you said that these are, this is actually widely used in Asia, but it's not widely used in Europe or you know sustainability.

1:01:54 CE: Yeah yeah, our own perception is always that we are ahead of time, but no, we are not. No no no.

1:02:02 IN: Could you imagine that maybe that's sort of a cultural difference maybe that...

1:02:08 CE: Yeah. What is also interesting in Europe we are very much concerned about for instance supply chain that we make all this due diligence and lalala, in Asia they don't give a shit. In Asia they are very much concerned about the customer and how many products they have had to withdraw from the market and stuff like that. In Europe we don't report on that, so they are still many differences between the regions and they have very different traditions.

1:02:37 IN: Interesting, but that is also actually one of the papers that I read but that is just like CSR reporting in general, not as SDGs, is that culture actually does have an impact

1:02:47 CE: yeah

1:02:47 IN: and it tends to be more the sort of the high context culture where you have more of a, and also a high, how do you say, sorts of focuses that they tend to actually...

1:02:57 CE: Yeah they compare themselves with their local competitors. You can also see the Danish CSR award. What the companies, who want to achieve the award, what they do is that they look at those who got an award and then that is trendsetting for what how the CSR reports in Denmark are moving.

1:03:18 IN: So basically they are just copying each other.

1:03:20 CE: Yeah. Often. In, you could say, the content blocks of what they include it's very much replica of what we have seen before.

1:03:32 IN: But I guess it's the whole that the area actually needs a bit of a, how do you say, a revolution kinda that they need to sort of stop, you know, and for a minute and actually think, okay so what is it that we are actually doing and does it even make sense for our business but because the business case is not really there, they don't really see a need to do it.

1:03:52 CE: True.

1:03:53 IN: And then it just becomes sort of a marketing effort that we just...

1:03:55 CE: Yeah, yeah.

1:03:58 IN: Interesting. Well I think my time is up. But thank you so much.

1:04:04 CE: You are welcome.

Appendix Z

The Five Hypotheses developed by Garcia-Sanchez et al (2016).

H1: *Ceteris paribus, the lower the values of individualism of the cultural system development in a country, the higher the level of firms' CSR disclosure practices.*
H2: *Ceteris paribus, the lower the values of masculinity of the cultural system development in a country, the higher the level of firms' CSR disclosure practices.*
H3: *Ceteris paribus, the lower the values of uncertainty avoidance of the cultural system development in a country, the higher the level of firms' CSR disclosure practices.*
H4: *Ceteris paribus, the lower the values of power distance of the cultural system development in a country, the higher the level of firms' CSR disclosure practices.*
H5: *Ceteris paribus, the higher the values of the long-term orientation of the cultural system development in a country, the higher the level of firms' CSR disclosure practices.*