

Third Progress Report

Principles for Responsible Banking



Building a greener society

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Principles for Responsible Banking Report

Ecology Building Society is a founding signatory of the Principles for Responsible Banking, launched by the United Nations Environment Programme (UNEP) Finance Initiative in September 2019. The Principles provide a framework for a sustainable banking system, by signatories demonstrating how their strategies and activities support the UN Sustainable Development Goals and the Paris Climate Agreement.

The Principles are a natural fit for Ecology. We have been dedicated to sustainable development throughout our 42 year history, and we are more committed than ever to our mission to build a greener society. Our motivation for signing the Principles extends far beyond organisational and lending activity considerations particular to Ecology Building Society. By signing the Principles, we are adding our weight to global efforts to transform the financial system, creating a growing movement that more banks are signing up to.

This is our third annual report indicating our progress in implementing the Principles.

Reporting and Self-Assessment Requirements	High-level summary of bank's response	Reference(s)/ Link(s) to bank's full response/relevant information

Principle 1: Alignment

We will align our business strategy to be consistent with and contribute to individuals' needs and society's goals, as expressed in the Sustainable Development Goals, the Paris Climate Agreement and relevant national and regional frameworks.

Business model

Describe (high-level) your bank's business model, including the main customer segments served, types of products and services provided, the main sectors and types of activities across the main geographies in which your bank operates or provides products and services. Please also quantify the information by disclosing e.g. the distribution of your bank's portfolio (%) in terms of geographies, segments (i.e. by balance sheet and/or off-balance sheet) or by disclosing the number of customers and clients served.

Response

As a building society, Ecology provides loans which are secured on residential property. Ecology is owned by, accountable to, and run cognisant of the wider interests of our Members – the people who borrow and save with us. Ecology operates across the UK. Our main customer segments are individuals (savers and borrowers), community groups, small scale developers, social enterprises and charities. We lend predominantly on the construction of new build properties to a high standard of energy efficiency, on the renovation or conversion of dilapidated or deteriorated properties to bring them back into use, and on community-led housing projects to create affordable residential properties and sustainable community infrastructure.

Our Key Performance Indicators and Progress in 2022 are shown on pages 6-9 and 38 of our Annual Report and Accounts 2022.

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Does your corporate strategy identify and reflect sustainability as strategic priority/ies for your bank? ☐ Yes ☐ No Please describe how your bank has aligned and/or is planning to align its strategy to be consistent with the Sustainable Development Goals (SDGs), the Paris Climate Agreement, and relevant national and regional frameworks. Does your bank also reference any of the following frameworks or sustainability regulatory reporting requirements in its strategic priorities or policies to implement these? ☐ UN Guiding Principles on Business and Human Rights ☐ International Labour Organization fundamental conventions ☐ UN Global Compact ☐ UN Declaration on the Rights of Indigenous Peoples ☐ Any applicable regulatory reporting requirements on environmental risk assessments, e.g. on climate risk - please specify which ones: ☐ Any applicable regulatory reporting requirements on social risk assessments, e.g. on modern slavery - please specify which ones: ☐ None of the above	Ecology has been dedicated to sustainable development throughout its 42 year history. Ecology's purpose is enshrined in its Memorandum: The primary purpose is making loans which are secured on residential property and are funded substantially by its Members, promoting ecological policies designed to protect or enhance the environment in accordance with the principles for sustainable development. During 2021, we co-developed our 2030 Strategy with board, colleagues, Members, and key partners, setting out our plans for a decade of action on sustainable development, motivated by the climate and ecological emergency and the need to provide high quality affordable homes in places people need to live. In 2022, we published Financing the Net Zero Transition including our intermediate targets for 2030. Climate related disclosures are included within our Annual Report & Accounts 2022, (pages 11-34) this includes reference to activities with Partnership for Carbon Accounting Financials (PCAF UK), Task Force on Climate-related Financial Disclosures (TCFD) and Global GHG Accounting and Reporting Standard for the Financial Industry.	Our 2030 Strategy Page 4. 11-17 Ecology Building Society First Progress Report Principles for Responsible Banking Page 5-11 Financing the Net Zero Transition Report 2022 Annual Report and Accounts 2022 Page 11-34
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Principle 2: Impact and Target Setting

We will continuously increase our positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from our activities, products and services. To this end, we will set and publish targets where we can have the most significant impacts.

2.1 Impact Analysis (Key Step 1)

Show that your bank has performed an impact analysis of its portfolio/s to identify its most significant impact areas and determine priority areas for target-setting. The impact analysis shall be updated regularly and fulfil the following requirements/elements (a-d):

a) **Scope:** What is the scope of your bank's impact analysis? Please describe which parts of the bank's core business areas, products/services across the main geographies that the bank operates in (as described under 1.1) have been considered in the impact analysis. Please also describe which areas have not yet been included, and why.

Response

Ecology has a relatively simple lending portfolio, with mortgage lending for the construction or renovation of residential properties, including community housing, and a small investment portfolio mainly in renewable energy infrastructure.

All lending and investments have been assessed against the UN Sustainable Development Goals, with most impacts associated with SDGs 7, 11, 12, 13.

Our Positive Impact is noted in pages 35-38 of our Annual Report and Accounts 2022.

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Pages 11 – 14

Our 2030 Strategy
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- b) **Portfolio composition:** Has your bank considered the composition of its portfolio (in %) in the analysis? Please provide proportional composition of your portfolio globally and per geographical scope
- i) by sectors & industries for business, corporate and investment banking portfolios (i.e. sector exposure or industry breakdown in %), and/or
- ii) by products & services and by types of customers for consumer and retail banking portfolios.

If your bank has taken another approach to determine the bank's scale of exposure, please elaborate, to show how you have considered where the bank's core business/major activities lie in terms of industries or sectors.

Response

Ecology has an ecological lending policy. We support the construction of new-build properties which achieve high standards of energy efficiency and renovations and conversions (of non-residential properties) which result in the improvement of the property's energy performance. Therefore, although many properties emit carbon dioxide emissions from fossil fuel use for heating, Ecology mortgages are fully targeted at reducing these emissions.

Page 38 of our Annual Report and Accounts 2022 titled 'Our Progress in 2022' shows

- Our Member engagement
- Our new lending split in 2022
- Geographical Spread of our lending
- Summary of carbon emissions from our mortgage lending and business operations

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c) Context: What are the main challenges and priorities related to sustainable development in the main countries/regions in which your bank and/or your clients operate? Please describe how these have been considered, including what stakeholders you have engaged to help inform this element of the impact analysis. This step aims to put your bank's portfolio impacts into the context of society's needs.	Response We understand the context and relevance of our impacts through our work with partners in the areas of sustainable homes and communities, such as the National Community Land Trust Network, Passivhaus Trust and Association for Environment Conscious Building Ecology has used the Partnership for Carbon Accounting Financials (PCAF) Global Greenhouse Gas Accounting and Reporting Standard for the Financial Industry to calculate carbon emissions from the mortgage portfolio, and disclosed the emissions and emission intensity in our Annual Report and Accounts. We are the first UK building society to publish our financed emissions using the Standard.	Annual Report and Accounts 2022 Pages 35-38
Based on these first 3 elements of an impact analysis, what positive and negative impact areas has your bank identified? Which (at least two) significant impact areas did you prioritize to pursue your target setting strategy (see 2.2)? Please disclose.	 Response The two most significant impacts have been identified as Environmental impact: Climate change is mitigated through reduction in carbon emissions from residential properties. Social and environmental impact: People have access to high quality affordable homes in places they need to live. Our 2022 publication 'Financing the Net Zero Transition' shows our intermediate targets for 2030 in relation to two categories of residential lending. 	Financing the Net Zero Transition Report 2022

d) For these (min. two prioritized impact areas): **Performance measurement:** Has your bank identified which sectors & industries
as well as types of customers financed or invested in are causing the
strongest actual positive or negative impacts? Please describe how you
assessed the performance of these, using appropriate indicators related
to significant impact areas that apply to your bank's context.

In determining priority areas for target-setting among its areas of most significant impact, you should consider the bank's current performance levels, i.e. qualitative and/or quantitative indicators and/or proxies of the social, economic and environmental impacts resulting from the bank's activities and provision of products and services. If you have identified climate and/or financial health&inclusion as your most significant impact areas, please also refer to the applicable indicators in the Annex.

If your bank has taken another approach to assess the intensity of impact resulting from the bank's activities and provision of products and services, please describe this.

The outcome of this step will then also provide the baseline (incl. indicators) you can use for setting targets in two areas of most significant impact.

Response

Collectively these two impacts are relevant to 100% of Ecology's mortgage lending, and relate to the whole UK geography where Ecology lends.

Our 2030 Strategy sets out the issues, challenges, and opportunities to create positive impact in this decisive decade. It identifies our priority areas that build on where we are today, provide opportunities for us to innovate, and enable us to maximise the shared value that we create for people and the environment.

Our 2022 publication 'Financing the Net Zero Transition' shows our intermediate targets for 2030.

We will deliver these priorities by continuing to provide impact-led products and services, increasing the opportunities for our Members to collaborate and share knowledge within the member community and with expert partners, and by agitating for change in the wider community.

Carbon emissions from our mortgage lending are on pages 30-33 of our Annual Report and Accounts 2022.

Our 2030 Strategy

Financing the Net Zero
Transition Report 2022

Annual Report and Accounts 2022 Pages 30-33

Self-assessment summary:							
Which of the following compone negative impacts?	nts of impact an	alysis has your bank comp	oleted, in order to id	entify the areas in which	your bank has its mos	st significant (poten	ntial) positive and
Scope:	⊠ Yes	☐ In progress	□ No				
Portfolio composition:	⊠ Yes	☐ In progress	□ No				
Context:	⊠ Yes	☐ In progress	□ No				
Performance measurement:	⊠ Yes	☐ In progress	☐ No				
Which most significant impact a	reas have you ide	entified for your bank, as	a result of the impac	ct analysis?			
Climate change mitigation, clima water, pollution, other: please spe	•	tion, resource efficiency &	circular economy, bio	odiversity, financial health	1 & inclusion, human ri	ghts, gender equality	y, decent employment,
Ecology focuses on all these impact Net Zero Transition'.	t areas within its le	ending and operations. as d	emonstrated in our su	iite of reports including Ani	nual Report and Accoun	ts 2022, 2030 Strategy	y and 'Financing the
How recent is the data used for a	ind disclosed in t	he impact analysis?					
☑ Up to 6 months prior to public	ation						
☐ Up to 12 months prior to public	cation						
☐ Up to 18 months prior to public	cation						
☐ Longer than 18 months prior to	publication						
Open text field to describe potent	ial challenges, asp	pects not covered by the al	oove etc.: (optional)				

2.2 Target Setting (Key Step 2)

Show that your bank has set and published a minimum of two targets which address at least two different areas of most significant impact that you identified in your impact analysis.

The targets have to be Specific, Measurable (qualitative or quantitative), Achievable, Relevant and Time-bound (SMART). Please disclose the following elements of target setting (a-d), for each target separately:

a) **Alignment:** which international, regional or national policy frameworks to align your bank's portfolio with have you identified as relevant? Show that the selected indicators and targets are linked to and drive alignment with and greater contribution to appropriate Sustainable Development Goals, the goals of the Paris Agreement, and other relevant international, national or regional frameworks.

You can build upon the context items under 2.1.

Response

We have undertaken our impact analysis and identified the significant impacts that are associated with our lending portfolio. We have disclosed our financed emissions. Our 2030 Strategy is fully focussed on delivering our ecological mission and creating positive outcomes for people and the environment, while enabling Ecology to continue as a successful, ethical business, owned by and accountable to its Members.

Our 2022 publication 'Financing the Net Zero Transition' shows our intermediate targets for 2030.

Our 2030 Strategy
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Financing the Net Zero
Transition Report 2022

b) **Baseline:** Have you determined a baseline for selected indicators and assessed the current level of alignment? Please disclose the indicators used as well as the year of the baseline.

You can build upon the performance measurement undertaken in 2.1 to determine the baseline for your target.

A package of indicators has been developed for climate change mitigation and financial health & inclusion to guide and support banks in their target setting and implementation journey. The overview of indicators can be found in the Annex of this template.

If your bank has prioritized climate mitigation and/or financial health & inclusion as (one of) your most significant impact areas, it is strongly recommended to report on the indicators in the Annex, using an overview table like below including the impact area, all relevant indicators and the corresponding indicator codes:

Impact area	Indicator code	Response
Climate change mitigation	A1.1	See adjacent
	A1.2	See adjacent
	A1.4	See adjacent
	A1.5	See adjacent

In case you have identified other and/or additional indicators as relevant to determine the baseline and assess the level of alignment towards impact driven targets, please disclose these.

Response

Relevant climate change indicators for our targets and ambition from the PRB Self-assessment template Annex include:

A.1.1: Does your bank have a climate strategy in place?

Response: Yes.

See 'Financing the Net Zero Transition' and 'Our 2030 Strategy'

We aim to achieve net zero carbon emissions in our business operations by 2030 at the latest.

We have an ambition to be net zero by 2050 across our financed emissions and have published our 2030 intermediate targets in 'Financing the Net Zero Transition'.

A.1.2: Paris Alignment – Has your bank set a long term portfolio-wide Parisalignment target? To become net zero by when?

Response: Yes.

Our specific ambitions are set out in 'Financing the Net Zero Transition' and 'Our 2030 Strategy'.

A.1.4: Portfolio analysis: Has your bank analysed (parts of) its lending and/ or investment portfolio in terms of financed emissions (Scope 3, category 15); technology mix or carbon-intensive sectors in the portfolio?

In 'Financing the Net Zero Transition' we set ourselves our 2030 Intermediate Targets for reducing financed emissions for 'New build property' and 'Retrofitted property' from a 2020 baseline.

A1.5 Business opportunities and financial products: Has your bank developed financial products tailored to support clients' and customers' reduction in GHG emissions (such as energy efficient mortgages, green loans, green bonds, green securitisations etc.)?

Our mortgage products, as featured on our website, have always been tailored to reduction of emissions.

Our 2030 Strategy

Financing the Net Zero
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c) SMART targets (incl. key performance indicators (KPIs)): Please disclose the targets for your first and your second area of most significant impact, if already in place (as well as further impact areas, if in place). Which KPIs are you using to monitor progress towards reaching the target? Please disclose.	Response 'Financing the Net Zero Transition' shows our intermediate targets for 2030.	Our 2030 Strategy Financing the Net Zero Transition Report 2022 Annual Report and Accounts 2022 Pages 11-38
d) Action plan: which actions including milestones have you defined to meet the set targets? Please describe. Please also show that your bank has analysed and acknowledged significant (potential) indirect impacts of the set targets within the impact area or on other impact areas and that it has set out relevant actions to avoid, mitigate, or compensate potential negative impacts.	Response 'Financing the Net Zero Transition' shows our intermediate targets for 2030.	Our 2030 Strategy Financing the Net Zero Transition Report 2022 Annual Report and Accounts 2022 Pages 11-38

Self-assessment summary: Which of the following components of target setting in line with the PRB requirements has your bank completed or is currently in a process of assessing for your					
	first area of most significant impact: Reduce new build residential mortgage portfolio operational GHG emissions from regulated energy use (Scope 3, category 15) by 50% per m², by 2030 from a 2020 base year.	second area of most significant impact: Reduce retrofitted residential mortgage portfolio operational GHG emissions from regulated energy use (Scope 3, category 15) by 50% per m², by 2030 from a 2020 base year.	(If you are setting targets in more impact areas)your third (and subsequent) area(s) of impact: Not applicable.		
Alignment	☐ Yes ☐ In progress ☐ No	☐ Yes ☐ In progress ☐ No	☐ Yes ☐ In progress ☐ No		
Baseline	☐ Yes ☐ In progress ☐ No	☐ Yes ☐ In progress ☐ No	☐ Yes ☐ In progress ☐ No		
SMART targets	☐ Yes ☐ In progress ☐ No	☐ Yes ☐ In progress ☐ No	☐ Yes ☐ In progress ☐ No		
Action plan	☐ Yes ☐ In progress ☐ No	☐ Yes ☐ In progress ☐ No	☐ Yes ☐ In progress ☐ No		

2. Target implementation and monitoring (Key Step 2)

For each target separately:

Show that your bank has implemented the actions it had previously defined to meet the set target.

Report on your bank's progress since the last report towards achieving each of the set targets and the impact your progress resulted in, using the indicators and KPIs to monitor progress you have defined under 2.2.

Or, in case of changes to implementation plans (relevant for 2nd and subsequent reports only): describe the potential changes (changes to priority impact areas, changes to indicators, acceleration/review of targets, introduction of new milestones or revisions of action plans) and explain why those changes have become necessary.

Response

Pages 30-33 of Annual Report and Accounts 2022 show the reduction in Financed Regulated Emission intensity in 2022 to 10.8 kgCO₂/£000 from 12.4 kgCO₂/£000 in 2021.

Pages 29-30 of Annual Report and Accounts 2022 shows emissions arising from our business operations.

Annual Report and Accounts 2022

Pages 29-33

Principle 3: Clients and Customers

We will work responsibly with our clients and our customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.

3.1 Client engagement

Does your bank have a policy or engagement process with clients and customers in place to encourage sustainable practices?

Does your bank have a policy for sectors in which you have identified the highest (potential) negative impacts?

Describe how your bank has worked with and/or is planning to work with its clients and customers to encourage sustainable practices and enable sustainable economic activities). It should include information on relevant policies, actions planned/implemented to support clients' transition, selected indicators on client engagement and, where possible, the impacts achieved.

This should be based on and in line with the impact analysis, targetsetting and action plans put in place by the bank (see P2).

Response

As a building society, Ecology is owned by our Members, who are our customers. Ecology's mandate is derived from the membership, with the primary purpose of Ecology expressed in the Memorandum and Articles.

In line with the Building Societies Act, Ecology operates on a one-member one-vote basis. Members have a significant input into the approach taken by Ecology, for example guiding us through our Ethics Panel, through Member surveys, our Member's Meet-ups, engaging with Directors and voting at our Annual General Meeting.

In 2021, we carried out a Member Consultation to inform development of Our 2030 Strategy. 750 Members took part, providing invaluable information to guide our strategy.

In all its activities, Ecology is committed to ethical behaviour towards all of its stakeholders, including Members, potential Members, staff, directors, partners, and suppliers. Ecology has an Ethics Policy and Framework to ensure that good outcomes are considered and monitored in all our activities. Ecology regularly communicates with Members, for example, sharing case studies in our newsletters, so that our Members are aware of the positive impact they are creating.

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Pages 35-38

3.2 Business opportunities

Describe what strategic business opportunities in relation to the increase of positive and the reduction of negative impacts your bank has identified and/or how you have worked on these in the reporting period. Provide information on existing products and services, information on sustainable products developed in terms of value (USD or local currency) and/or as a % of your portfolio, and which SDGs or impact areas you are striving to make a positive impact on (e.g. green mortgages – climate, social bonds – financial inclusion, etc.).

Response

Ecology seeks to incentivise people to build, buy or renovate sustainably. We specify entry-level energy efficiency standards to be achieved through our lending. We reward borrowers whose properties are more energy efficient with our range of award winning 'C-Change' discounts on our mortgage products.

In 2022, we enhanced our range of C-Change discounts by increasing the segmentation of properties with the highest energy performance (above 100 SAP points on the EPC) to incentivise borrowers to maximise their SAP score.

We also launched our first cashback incentive to contribute to the cost of installing either a ground or air source heat pump. This is a drive to influence and change the behaviour of heating UK homes away from fossil fuels to low carbon, renewable heating technologies.

We introduced a new off-site construction mortgage range and teamed up with leading modular manufacturers to launch our new range of mortgages to support the growth of off-site constructed, modular housing.

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<u>Pages 16-17</u>

Principle 4: Stakeholders

We will proactively and responsibly consult, engage and partner with relevant stakeholders to achieve society's goals.

4.1 Stakeholder identification and consultation

Does your bank have a process to identify and regularly consult, engage, collaborate and partner with stakeholders (or stakeholder groups) you have identified as relevant in relation to the impact analysis and target setting process?

Please describe which stakeholders (or groups/types of stakeholders) you have identified, consulted, engaged, collaborated or partnered with for the purpose of implementing the Principles and improving your bank's impacts. This should include a high-level overview of how your bank has identified relevant stakeholders, what issues were addressed/results achieved and how they fed into the action planning process.

Response

Activism is one of Ecology's five key values. It is through working with stakeholders and partners that Ecology can create positive impacts that are beyond the remit of its lending activities.

Ecology engages with a range of partners, to advance its mission, across three main themes: Ethical finance; Sustainable homes and communities; and Addressing the climate and ecological emergency.

For example, Ecology is helping to expand community-led housing in the UK, through knowledge exchange in partnership with the National Community-led Housing Network and UK Cohousing.

Ecology seeks to work in partnership with other organisations and groups who share our beliefs and with whom there is a synergy of interests or activities. Working with our partners ensures we are grounded in the communities we serve. Many of our partnerships are longstanding, but we also constantly review and refresh our partnerships as the delivery of our ecological mission continues to evolve.

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Pages 16-19

Principle 5: Governance & Culture

We will implement our commitment to these Principles through effective governance and a culture of responsible banking.

5.1 Governance Structure for Implementation of the Principles

Does your bank have a governance system in place that incorporates the PRB?

Please describe the relevant governance structures, policies and procedures your bank has in place/is planning to put in place to manage significant positive and negative (potential) impacts and support the effective implementation of the Principles. This includes information about

- which committee has responsibility over the sustainability strategy as well as targets approval and monitoring (including information about the highest level of governance the PRB is subjected to),
- details about the chair of the committee and the process and frequency for the board having oversight of PRB implementation (including remedial action in the event of targets or milestones not being achieved or unexpected negative impacts being detected), as well as
- remuneration practices linked to sustainability targets.

Response

Ecology Building Society is a member-owned mutual. Ecology's purpose is enshrined in its Memorandum, and its mandate comes from the membership.

The Board of Directors is responsible for the governance of Ecology, on behalf of the Members. To ensure the Board and its Committees have the appropriate balance of skills, experience and knowledge, Ecology uses a Board skills matrix. The matrix includes industry or sector experience in sustainable development, charities and co-operatives. Ecology has a long-established fair pay policy.

Page 26 -28 of our Annual Report and Accounts summarises the Society's Governance and Management on Climate Risk.

Page 3 & 8 of Net zero transition include references to Governance.

During the first quarter of 2023 the Ecology Board set up and delegated responsibilities to the Environmental and Societal Impact Committee. The committee is charged with maximising the positive impact of the Society in accordance with its mission.

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Pages 3, 4, 20, 21

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Pages 3 & 8

5.2 Promoting a culture of responsible banking:

Describe the initiatives and measures of your bank to foster a culture of responsible banking among its employees (e.g., capacity building, e-learning, sustainability trainings for client-facing roles, inclusion in remuneration structures and performance management and leadership communication, amongst others).

Response

Ecology invests in training and support of colleagues to ensure job progression and satisfaction, but also to increase understanding of Ecology's ethical and environmental nature, including the Certificate in Green and Sustainable Finance of the Chartered Banker Institute, and taking part in training provided by the Institute for Social Banking, which supports employee development of social banking institutions across Europe.

Ecology has a colleague Green Team, Social and Charity Committee and Gardening Club, creating an inspiring, inclusive and knowledge sharing community to enact sustainable development principles. Our newsletter regularly covers colleague stories, and colleagues are encouraged to share news on impactful activities on the intranet and external blog. All colleagues have three paid days to volunteer on charitable activities. All staff are paid a fair wage (we are accredited by the Living Wage Foundation, including contractors working on our premises). We have a maximum limit of the pay ratio between the highest and lowest basic salary. This limit was agreed by the Members and demonstrates our commitment to fair pay.

In 2022 we signed up to becoming an accredited menopause-friendly workplace and supporting a men's mental wellbeing group.

Page 37 and 38 of our Annual Report and Accounts 2022 includes Sponsorship and Charitable giving, impact on 'Our Colleagues' and colleagues involvement in 'Our Local Community'.

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5.3 Policies and due diligence processes

Does your bank have policies in place that address environmental and social risks within your portfolio? Please describe.

Please describe what due diligence processes your bank has installed to identify and manage environmental and social risks associated with your portfolio. This can include aspects such as identification of significant/salient risks, environmental and social risks mitigation and definition of action plans, monitoring and reporting on risks and any existing grievance mechanism, as well as the governance structures you have in place to oversee these risks.

Response

In addition to the information in our Annual Report and Accounts, Our 2030 Strategy and Financing the Net Zero Transition', the Society has policies which include

- Climate Risk
- Environmental Policy Statement
- Equality Diversity and Inclusion

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<u>Page 26-28</u>

Self-assessment summary		
Does the CEO or other C-suite officers have regular oversight over the imple	mentation of the Principles through the bank's governance system?	
⊠ Yes □ No		
Does the governance system entail structures to oversee PRB implementation the event targets/milestones are not achieved or unexpected neg. impacts a	on (e.g. incl. impact analysis and target setting, actions to achieve these targets and proces are detected)?	ses of remedial action in
⊠ Yes □ No		
Does your bank have measures in place to promote a culture of sustainabili	ty among employees (as described in 5.2)?	
Principle 6: Transparency & Accountability We will periodically review our individual and collective implementation contribution to society's goals.	of these Principles and be transparent about and accountable for our positive and negat	ive impacts and our
6.1 Assurance	Response	Annual Report and
Has this publicly disclosed information on your PRB commitments been assured by an independent assurer?	Assurance can be derived from the sign off of our Annual Report and Accounts 2022 which includes publication of our Positive Impact and Climate Related Disclosures.	Accounts 2022
☐ Yes		
If applicable, please include the link or description of the assurance statement.		
6.2 Reporting on other frameworks	Response	Annual Report and
Does your bank disclose sustainability information in any of the listed below standards and frameworks?	Our climate-related disclosures covering Strategy, Governance, Risk Management, and Metrics and Targets will continue to evolve, in line with the guidance of the Task	<u>Accounts 2022</u> <u>Page 11-12</u>
□GRI	Force on Climate-related Financial Disclosures (TCFD). Table 1 on page 12 of Annual Report and Accounts 2022, summarises our activity on climate-related risks and	
□SASB	opportunities during 2022.	
□CDP		
☐ IFRS Sustainability Disclosure Standards (to be published)		
⊠TCFD		
☐ Other:		

6.3 Outlook	Response	Annual Report and
What are the next steps your bank will undertake in next 12 month-reporting period (particularly on impact analysis, target setting and governance structure for implementing the PRB)? Please describe briefly.	Table 1 on page 12 of Annual Report and Accounts 2022, outlines our planned activities from 2023	Accounts 2022 Page 12
6.4 Challenges		
Here is a short section to find out about challenges your bank is possibly facing regarding the implementation of the Principles for Responsible Banking. Your feedback will be helpful to contextualise the collective progress of PRB signatory banks.		
What challenges have you prioritized to address when implementing the Principles for Responsible Banking? Please choose what you consider the top three challenges your bank has prioritized to address in the last 12 months (optional question).		
If desired, you can elaborate on challenges and how you are tackling these:		
☐ Embedding PRB oversight into governance		
☐ Gaining or maintaining momentum in the bank		
☐ Getting started: where to start and what to focus on in the beginning		
☐ Conducting an impact analysis		
Assessing negative environmental and social impacts		
☐ Choosing the right performance measurement methodology/ies		
☐ Setting targets		
Other:		
If desired, you can elaborate on challenges and how you are tackling these:		
☐ Customer engagement		
☐ Stakeholder engagement		
☐ Data availability		
☐ Data quality		
☐ Access to resources		
Reporting		
Assurance		
☐ Prioritizing actions internally		

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Authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. Financial Services Register No. 162090