



**UJJIVAN**  
UJJIVAN SMALL FINANCE BANK  
Build a Better Life

# ESG Policy

Corporate office:

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# ESG Policy

## 1 Introduction

Ujjivan Small Finance Bank Limited has embarked on its journey towards sustainability as a reflection of its commitment towards environment, social and governance (ESG) principles.

At the outset, the bank carried out materiality assessment to identify issues that have a substantial influence on the banks' business performance, reputation, and stakeholder interests. This exercise was carried out in consultation with internal and external stakeholders to enhance Ujjivan's ability to determine its strategy and prioritize efforts, resources, and reporting on the material issues. The Bank's sustainability framework is based on a clear understanding of the material issues identified by materiality assessment.

Ujjivan SFB aims to balance financial performance with social responsibility and environmental stewardship. The sustainability approach of the bank defines its strategy and action to align its operations with ESG trends, regulatory requirements, and stakeholder expectations. Sustainable banking practices contribute to a more resilient financial system, help address environmental and social challenges and support the transition to a sustainable and inclusive economy.

This Policy sets out the broad framework guiding the Bank's ESG activities. The Policy also outlines the governance structure that oversees the ESG aspects of the bank, showcases the ESG framework and highlights the key ESG indicators & outlays the commitments for strict adherence. Furthermore, it lays out the RACI Matrix and the reporting mandates.

## 2 Key Definitions

- Sustainable development:** A concept that aims to meet the needs of the present generation without compromising the needs and demands of future generations. It emphasizes the integration of economic, social, and environmental considerations to create a balanced and equitable approach to development.
- Resource Efficiency:** The practice of using fewer resources to achieve the same or better results. It involves using resources (energy sources, water, paper, etc.,) more efficiently to reduce waste generation and minimize the environmental impacts associated with resource consumption. Resource efficiency plays a crucial role in promoting sustainability, mitigating climate change, and ensuring the responsible use of resources.
- Waste Management:** Implementing strategies and practices to minimize waste generation, reduce environmental impact, and promote sustainability in banking operations. While the banking industry might not generate as much physical waste as some other sectors, there are still several areas where waste management principles can be applied to contribute to greener and more responsible banking.
- Supply Chain Sustainability:** Supply Chain Sustainability refers to the practice of embedding Environmental, Social, and Governance (ESG) considerations across Ujjivan SFB's supply chain during the selection and procurement processes. It aims to minimize negative environmental impacts, uphold ethical standards, and promote social well-being while enhancing operational resilience and business continuity.
- Diversity & Inclusion:** The interconnected concepts that emphasize creating environments where individuals of various backgrounds, identities, and perspectives are valued, respected, and empowered. These concepts are crucial in workplaces, communities, and society at large, as they promote equality, fairness, and the enrichment of perspectives.

6. **Ethical Business:** Conducting business activities in a manner that aligns with moral principles, values, and social norms. It involves making decisions and taking actions that consider the well-being of all internal and external stakeholders Ethical business practices go beyond legal requirements and strive to create positive impacts while avoiding any adverse effects.

7. **Financial Inclusion:** Accessibility of financial services, products, and resources to all segments of a population, including the people underserved or excluded from the formal financial system. The goal is to ensure that individuals and communities have access to essential financial tools and services that can help improve their economic well-being and overall quality of life.

### 3 Document Reference

- All Regulatory guidelines issued until Dec 2024 (Regulation 34(2) of SEBI LODR, 2015 and read with SEBI issued Circular SEBI/HO/CFD/CFD-SEC-2/P/CIR/2023/122) have been incorporated in this document.
- This document was approved by the Board on 20<sup>th</sup> March 2025. This document shall be effective from 1<sup>st</sup> April 2025
- SEBI Circular - Timeline for Review of ESG Rating pursuant to occurrence of 'Material Events' dated January 17, 2025
- SEBI Circular - Industry Standards on Reporting of BRSR Core - December 20, 2024
- Draft Disclosure framework on Climate-rated Financial Risks, 2024 dated February 28, 2024
- SEBI circular - Measures to facilitate ease of doing business with respect to framework for assurance or assessment, ESG disclosures for value chain, and introduction of voluntary disclosure on green credits. – 28<sup>th</sup> March 2025

### 4 Version Control

(Mandatory Section- Summarise the historical references / Institutional Memory of the document.)

Version No.	Effective Date	Approved on	Summary of major Changes
1.0	29.2.2024	29.2.2024	New policy introduced & approved at RMCB
2.0	01.04.2025	20.3.2025	<ol style="list-style-type: none"> <li>1. Change in the ESG Governance Structure</li> <li>2. Reference to the Bank's philosophy on unconventional Oil &amp; Gas financing/ IFC aligned Exclusion list</li> <li>3. Frequency of disclosures &amp; Timelines</li> <li>4. Frequency of Policy Review</li> </ol>
3.0	23.01.2025	22.01.2026	<ol style="list-style-type: none"> <li>1. Scope</li> <li>2. Governance Structure</li> <li>3. Following changes under the section 'Sustainability at Ujjivan':               <ol style="list-style-type: none"> <li>(i) Redefinition of energy conservation measures - water, paper &amp; Energy, Waste management</li> <li>(ii) Inclusion of digital transformation measures</li> </ol> </li> </ol>

			(iii) Promotion of Diversity, Equity & inclusion
			(iv) Mention on Supplier code of conduct
			(v) Mention on the training & awareness on ESG
			(vi) Mention on the Sustainable Event management
			(vii) ESG risk-based survey on new branch locations
			4. Inclusion of TCFD in RACI Matrix
			5. Revision of the timelines of the Sustainability report & TCFD

Policy Approval Committee	
Approving Committee	Board of Directors
Endorsing Committee (Board level)	CSR & sustainability committee of the Board
Endorsing Committee (Management Level)	CSR & sustainability Management committee
Policy Owner	Sustainable Banking
Frequency	Annual

## 5 Sustainability so far at Ujjivan

At Ujjivan Small Finance Bank, we reflect a commitment to not only enhance financial growth but also to attain a future filled with sustainable growth for all. Ujjivan SFB aims to promote financial inclusion by extending financial services and support to underserved segments of society including people from low-income backgrounds, women, rural populations, and marginalized communities.

As a mass-market bank, Ujjivan offers a wide range of financial services and a personalized customer experience. Ujjivan has identified the relevant issues to the banking sector and adopted the best benchmarking practices aligned with the UNSDG goals. Ujjivan also follows the applicable guidelines provided by SEBI/RBI. With technology as a key enabler, Ujjivan has expanded its reach and enhanced the customer experience thereby providing accessible financial services to a broad range of people. The bank focuses on providing financial literacy training and capacity-building programs to its customers. Ujjivan prioritizes social impact and measures success not only in financial terms but also in terms of positive social outcomes.

## 6 Scope

This policy is applicable to all Ujjivan employees, banking products, business operations, value chain and related services.

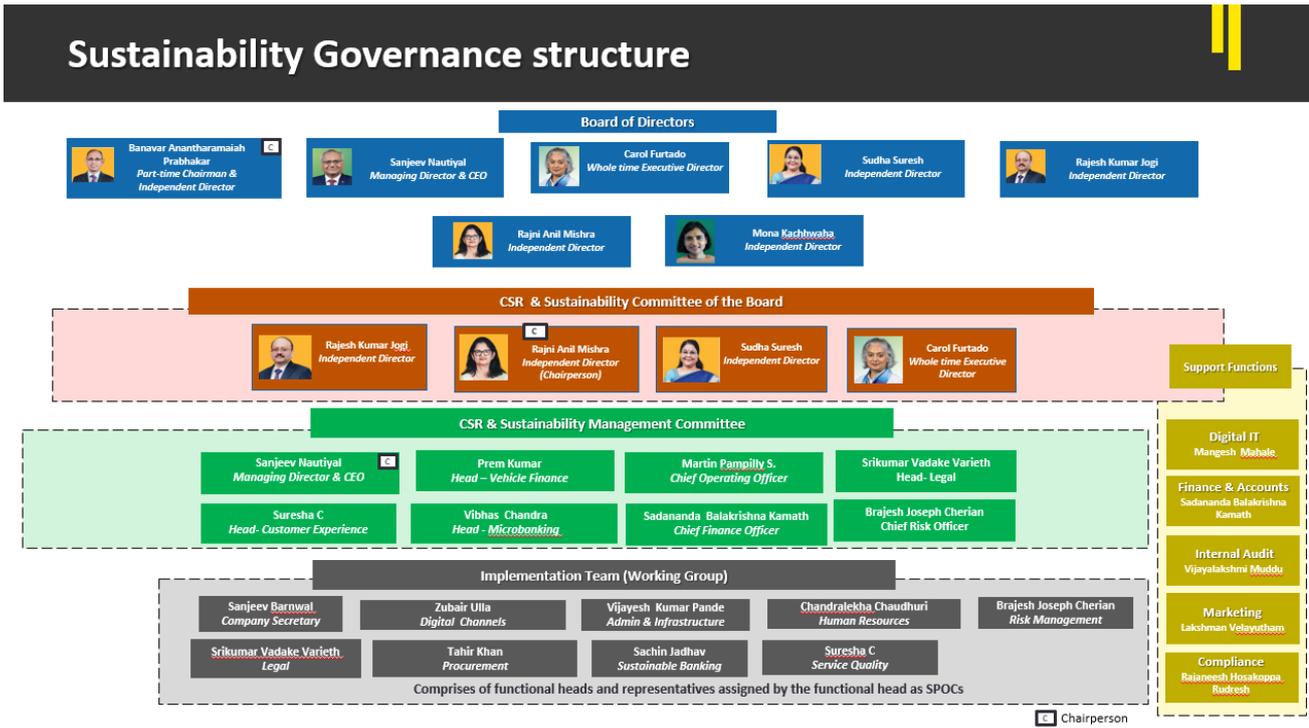
## 7 Objective

At Ujjivan, we recognize the significant role we play in fostering sustainable development, as well as the far-reaching influence that the banking industry can have on society and the environment. Aligned with our mission statement which emphasizes providing financial services to the unserved and underserved sections

as a responsible mass market bank, with a focus on building a sustainable tomorrow, we commit to fostering progress and contributing towards the creation of an inclusive and sustainable society.

As a responsible financial institution, we are dedicated to seamlessly integrating sustainability into our banking products, operations, and services. Furthermore, we ensure that the policy commitments outlined below are effectively disseminated to all employees, stakeholders, and relevant parties through diverse channels of communication.

## 8 Governance Structure



After rebranding the ‘Social Services’ Department to ‘Sustainable Banking’, the Bank has strengthened the Governance structure to ensure that sustainability considerations are an integral part of our decision-making processes.

The bank has framed a sustainability governance structure with the following purposes:

- Define strategic direction to guide & implement the sustainability roadmap
- Effective management of stakeholders & promote collaborative approach
- Foster a culture of sustainability

This multi-tier sustainability governance structure has been designed to ensure successful integration and monitoring of Environmental, Social & Governance (ESG) principles within the Bank. This structure aims to facilitate the strategic execution of sustainable practices while providing robust oversight to ensure compliance and meaningful impact in areas related to environmental conservation, social responsibility, and ethical governance.

## **Board of Directors**

- The Board shall act as the ultimate authority for all the bank level strategic objectives and public disclosures

*Please refer to the above picture for the composition*

## **Roles & Responsibilities:**

- i. The Board of the Bank has overall responsibility, including culture, governance framework and approving as well as overseeing management's implementation of the Bank's strategic objectives.
- ii. The Board shall oversee the implementation of key policies pertaining to the bank's ESG

**Sustainable Banking Team:** National Manager-Sustainable Banking & Lead -ESG of Sustainable Banking department shall be responsible for

- (i) Driving the Sustainability initiatives and ESG related disclosures of the Bank
- (ii) Shall liaise with the implementation team and other departments of the bank in collating the ESG reports
- (iii) Shall organise meetings with the CSR & Sustainability committee at Management & Board levels
- (iv) Shall ensure that the ESG webpage is updated every year within 2 months of the disclosure of the Sustainability & TCFD reports
- (v) Review and revise the ESG policy annually and disclose in the ESG webpage
- (vi) Provide inputs to the Bank's ERM unit on specific metrics and targets which are required to be published in the Bank's TCFD disclosure framework.

## **CSR & Sustainability Committee of the Board**

### **Composition:**

- The CSR and Sustainability Committee of the Board shall consist of three or more directors, including at least one Independent Director.
- One member shall serve as the Chairperson of the Committee.
- The Convenor shall be the Company Secretary.

*Please refer to the above picture for the composition*

### **Responsibility:**

1. The CSR & Sustainability Committee of the Board serves as the governing body responsible for defining the scope of Sustainability activities and ensuring compliance with the ESG Policy
2. It is responsible for formulating policies on Sustainability
3. The Committee oversees the bank's sustainability operations, conducts reviews, and provides strategic direction
4. It conducts reviews of the Bank's performance on Sustainability initiatives
5. The Committee provides support and guidance to the CSR & Sustainability Management Committee, ensuring adequate resources and alignment with organizational goals
6. It identifies key areas of focus for the Organization, including environmental conservation, social welfare, and ethical business practices

## CSR & Sustainability Management Committee

### Composition:

Please refer to the chart above.

### Responsibility:

1. Develop a comprehensive strategy for the ESG Initiatives
2. Establish an execution team to implement ESG programs
3. Provide operational guidelines to the execution team and approve internal SOPs on the Sustainability programs
4. Assess and approve strategic partnerships with external agencies/ consulting services on ESG as required
5. Ensure periodic review of the progress on the goals and targets set for the year

### Implementation Team (Working Group)

1. The implementation shall identify the ESG opportunities at all applicable areas and is responsible for implementing the ESG programs across the organization relevant to their functions and responsibilities
2. SPOCs identified by the respective department heads constitute the ESG implementation team

The Implementation team shall drive the implementation of the sustainability initiatives within the organization, managing on-ground teams and evaluating program suitability. The group diligently monitors and records both the quantitative and qualitative benefits stemming from these programs, ensuring effective communication regarding program statuses pertaining their respective department to the Sustainable Banking Team. Comprising functional heads and nominated SPOCs, the working group ensures data provision and execution of initiatives at grassroot level, aiming to translate approved plans into tangible improvements.

The Climate Risk management & TCFD reporting requirements shall be managed by the Enterprise Risk Team overseen by the Enterprise Risk Management Committee and Risk Management Committee of Board. The Bank's ICAAP policy shall govern the various frameworks implemented on climate risk management and mitigation of financial losses thereof.

## 9 ESG Framework – The Six pillars

Dividing the sustainability pillar into focused areas is a strategic approach that allows the Bank to effectively address specific goals and targets within its sustainability initiatives. This approach provides clarity and structure, enabling the Bank to allocate resources, track progress, and achieve meaningful outcomes. The six pillars of the ESG framework are as follows:

- |                           |                         |
|---------------------------|-------------------------|
| 1. Sustainable Operations | 4. Effective Governance |
| 2. Empowering Communities | 5. Responsible Finance  |
| 3. Human Capital          | 6. Customer Centricity  |

1. **Sustainable Operations** - To minimize environmental impact, maximize resource utilization, and contribute to long-term social and environmental well-being, sustainable operations refer to the strategic integration of environmentally conscious practices into an organization's daily activities and processes.
2. **Effective Governance** – Effective governance involves robust governance, transparency, and a conducive environment, ensuring no compromise on ethics and values amidst externalities.
3. **Empowering Communities** - Creating a more equitable and inclusive society by delivering holistic sustainable values across the communities we operate. Supporting essential workers and vulnerable sections of society through focused interventions like education, skilling, healthcare.
4. **Responsible Finance** – Responsible finance focuses on creating positive environmental impact and fostering an inclusive baking ecosystem, improving access, usage, and quality.
5. **Human Capital** - Human capital is a critical aspect, ensuring fair and respectful treatment of employees, providing opportunities for growth and development, promoting diversity and inclusion, creating a safe and healthy work environment, and attracting and retaining top talent.
6. **Customer Centricity** - Customer centricity is an organizational approach that places the customer at the core of business operations, emphasizing the development and maintenance of strong customer relationships through effective communication, personalized services, and a deep understanding of customer needs and preferences.

#### **ESG aspects cutting across**

1. **Transparency & disclosure and Stakeholder engagement** - Comprehensive approach that encompasses transparent and effective communication practices within an organization, Ensuring data completeness, accountability, and data transparency to all relevant stakeholders and available in a timely manner.
2. **Stakeholder engagement** – Stakeholder engagement Focus on engaging with internal and external stakeholders and creating value for them involving proactively sharing relevant and accurate information with stakeholders in a timely manner, promoting open dialogue, and fostering meaningful engagement.
3. **Digital Transformation** - Digital transformation involves a customer-driven, digital-first approach to business, transforming models, experiences, processes, and operations. Integrating digital technology significantly impacts organizational functions and benefits.

## 10 Key ESG Indicators

Below listed are the key ESG indicators:

Environment	Social	Governance
GHG Emission reduction	Corporate Social Responsibility	Compliance
Sustainable by design	Talent Management	Data Privacy and Cyber Security
Green Financing and banking products aimed at environmental adaptation and mitigation	Human Rights	Risk Management
	Diversity and Inclusion	Governance Structure
	Health & Safety	Digital transformation
	Inclusive Finance	Transparency and disclosure
	Customer centricity	Stakeholder engagement

The performance of the above indicators shall be audited through an internal audit team and actions shall be planned for continuous improvement across all ESG space.

## 11 Sustainability at Ujjivan:

Through this policy, we aim to adhere to the below commitments:

- Ensure full compliance with all relevant rules and regulations related to sustainability (Environment, social and Governance aspects).
- Conduct Business operations in alignment with the International Finance Corporation (IFC) standards which reflects in the Bank's credit policy & the Policy on financing unconventional oil & gas that includes business exclusion list that reflects the IFC's guidelines (The extract of the policies are disclosed in the Bank's Sustainability webpage).
- Focus on enhancing financial services and inclusive financing for underserved groups and marginalized communities by offering fair and transparent pricing, a diverse portfolio, and financial education & literacy programs.
- Ensure efficient consumption of natural resources such as paper, energy, and water that are utilized in our operations through process improvements and technological interventions.
- Encourage the usage of eco-friendly products across all our operations, wherever feasible (eg: glass water bottles instead of paper cups, eliminate one time use materials etc.,) .
- Ensure to pursue efforts to address climate change, by supporting and funding low-carbon and climate-resilient projects, wherever feasible. Communicate ESG issues to relevant stakeholders at planned intervals.
- Embrace digital transformation wherever feasible, driving efficiency, enhancing customer experiences, and reducing our carbon footprint.

- Ensure the reduction of greenhouse gas emissions through energy efficiency measures, renewable energy sources, and cleaner technological alternatives.
- Identify opportunities to substitute conventional electricity with renewable energy sources (eg: On-site solar PV, PPA (Power Purchased Agreement etc.,)) wherever feasible, to reduce GHG emissions.
- Explore opportunities to reduce paper consumption across our business operations through alternate material, process improvements and digitalization.
- Adopt and implement water conservation measures to reduce freshwater consumption.
- Ensure all waste generated across business operations are properly collected, segregated, and disposed in a scientific and environmentally responsible manner (eg. Recycling through authorized vendors, Reuse).
- Uphold and advocate for human rights, both within our organization and across our supply chain in accordance with the UNGC Human Right Principles.
- Foster equal opportunities for all by promoting diversity, equality, and inclusivity within workforce.
- Ensure the observance of ethical business practices and treat all stakeholders with fairness, respect, and dignity.
- Prioritize the safety and well-being of our employees, customers, and communities by fostering a safe and hygienic working environment.
- Explore opportunities to integrate sustainability aspects into the vendor procurement processes, working towards establishing a sustainable supply chain through Ujjivan's supplier code of conduct.
- Proactively engage with business areas, addressing needs and improving quality of life, collaborating with stakeholders, supporting regional efforts, and promoting communication to address social issues.
- Provide pertinent environmental and social information on sustainability endeavors to all our relevant stakeholders.
- Maintain stakeholder trust by consistently delivering on our sustainability commitments and customer loyalty through ethical and transparent business practices.
- Ensure safeguarding the privacy and confidentiality of information concerning our customers and employees by implementing robust security measures that prevent unauthorized access to data.
- Conduct training and awareness programs to improve the environmental and social responsibility culture across the organization.
- Ensure that all applicable ESG considerations (eg: Paper consumption, use of reusable material) are incorporated during the planning and implementation engagement programs (e.g., awareness campaigns, training sessions, etc.) conducted across bank operations.
- Explore the feasibility of conducting ESG risk-based survey while identifying locations for the new branches of the Bank

## 12 Responsible, Accountable, Consulted & Informed (RACI) Matrix

An ESG RACI matrix can be particularly useful for ESG-related initiatives because they often involve various departments, stakeholders, and levels of the organization. The matrix helps to ensure that everyone understands their role and contribution to the overall ESG strategy. It promotes transparency, accountability, and effective communication throughout the ESG implementation process.

Activities	Responsible	Accountable	Consulted	Informed
Ultimate authority & approver of strategy	Board of Directors	Board of Directors	CSR & Sustainability committee of Board & Management committee	Implementation Team
Data Monitoring and Reporting	Implementation Team	Sustainable Banking	CSR & Sustainability Management Committee	CSR & Sustainability Committee of Board
Stakeholder Engagement	Implementation Team	Implementation Team	CSR & Sustainability Management Committee	CSR & Sustainability Committee of Board
Audits/Assessments/ External ESG Ratings	Sustainable Banking	CSR & Sustainability Management Committee	Implementation Team	CSR & Sustainability Committee of Board
Performance Reviews	Sustainable Banking	CSR & Sustainability Management Committee	Implementation Team	CSR & Sustainability Committee of Board
Reporting to External Stakeholders	Sustainable Banking	CSR & Sustainability Management Committee	CSR & Sustainability Committee of Board	Board of Directors
Disclosures (Sustainability report/BRSR)	Sustainable Banking	CSR & Sustainability Management Committee	CSR & Sustainability Committee of Board	Board of Directors
Disclosures (TCFD)	Enterprise Risk	Enterprise Risk Management Committee (ERMC)	Risk Management Committee of Board (RMCB)	Board of Directors

## 13 Reporting Requirements

Identifying relevant ESG issues for Ujjivan's banking operations is a crucial step in creating a comprehensive sustainability commitment. Creating a sustainability policy that encompasses these issues demonstrates Ujjivan's commitment to transparency, accountability, and making a positive impact on the ESG aspects. It also provides a framework for reporting and measuring progress in these areas over time, which can be valuable for building trust with stakeholders, investors, customers, and the community.

## 14 Disclosures and External Requirements

As responsible banking, Ujjivan's disclosure includes the non-financial aspects. Disclosures include the Business Responsibility and Sustainability Report (BRSR), Sustainability Report & TCFD. They help in understanding and integrating Environmental, Social, and Governance (ESG) factors into our operations and decision-making processes.

The framework of BRSR reporting shall be aligned with the regulatory mandate from time to time & for the voluntary disclosures, the Bank shall follow the recommendations of the CSR & Sustainability committee of the Board.

Ujjivan believes that developing a sustainability framework to disclose sustainability performance is a necessary step toward nation-building. Such reports serve as a transparent communication channel through which Ujjivan can share the progress, achievements, and areas for improvement related to ESG initiatives. This transparency helps build trust with stakeholders, including customers, investors, employees, and the broader community. The data reported in the disclosures shall be verified & approved by the respective department Heads and the final draft of the BRSR & Sustainability reports shall be submitted to the CSR & Sustainability Management committee and the Board committee as notification.

TCFD disclosure (as guided by BCBS and Draft RBI guidelines) shall be compiled by the National Manager-Enterprise Risk & he/she shall obtain necessary approvals from the Chief Risk Officer and disclose in the ESG microsite. The content, design, printing of the report & the timelines of the disclosure rests with the Enterprise Risk Management Team.

The above-stated content shall be reviewed annually and shall be updated if required.

## 15 Frequency of Disclosures & Timelines

The following reports shall be disclosed annually at the timelines as defined below:

- (i) Business Responsibility & Sustainability Report (BRSR) along with obtaining the assurance as per the BRSR Core for the value chain in the manner specified by SEBI/industry standard shall be disclosed along with the Bank's Annual report by May / June of the immediately following financial year or as mandated by the Regulatory & Statutory Authorities
- (ii) Sustainability Report shall be reported on Annual basis by October of the immediately following FY
- (iii) TCFD shall be reported on Annual basis by December of the immediately following FY.

## 16 Frequency of Policy review

The policy shall be reviewed annually, updated to accommodate the recent changes and published with the Committee's approval as defined in Section 8.

## 17 Sign-off

Proposed by:

Name	Designation	Signature
Srividhya Durairajan	Lead – Environmental, Social & Governance	

Recommended by:

Name	Designation	Signature
Sachin Jadhav	National Manager – Sustainable Banking	

Approved by:

**The Board on 22<sup>nd</sup> Jan 2026.**