



Environmental and social risk policy framework

Comprehensive, highest industry standards, deeply rooted in our culture

Our comprehensive environmental and social risk (ESR) framework is deeply rooted in our culture, and

- governs client and supplier relationships and applies firmwide to all activities;
- meets the highest industry standards as recognized by environmental, social, governance ratings; and
- is integrated in management practices and control principles and overseen at the most senior level of our firm.

This framework¹ is aligned with our *UBS in Society* organization, which covers all the activities and capabilities related to sustainable finance (including sustainable investing), philanthropy, environmental, climate and human rights policies governing client and supplier relationships, our environmental footprint, human resources as well as community investment.

Introduction

We live in a world that is more interconnected, more interdependent and more interactive than ever before. Rapid technological advances, in particular, continue to have a profound effect on the economic, political, cultural, environmental and social landscape. These advances have changed the way we think and act. They have altered the way we do business. They have transformed the products and services we consume, and reshaped the perceptions of the world around us. While this has brought with it significant benefits and opportunities, it has also created far greater awareness of the challenges we all face.

As a global company and the largest truly global wealth manager, UBS is in a unique position to help address these challenges, both together with our clients and through our own efforts.

Our principles and standards clearly define how we want to do things at UBS. They apply to all aspects of our business and the ways in which we engage with our stakeholders. Our Code of Conduct and Ethics guides our approach to corporate responsibility. Our work in key societal areas such as protecting the environment and respecting human rights are part of this. Living up to our societal responsibilities contributes to the wider goal of sustainable development. As a global firm, we take responsibility for leading the debate on important societal topics, contribute to the setting of standards and collaborate in and beyond our industry.

Managing ESR is a key component of our corporate responsibility. We apply an ESR policy framework to all our activities. This helps us identify and manage potential adverse impacts to the environment and to human rights, as well as the associated risks affecting our clients and us. We have set standards in product development, investments, financing and for supply chain management decisions. We have identified certain controversial activities we will not engage in, or will only engage in under stringent criteria. As part of this process, we engage with clients and suppliers to better understand their processes and policies and to explore how any environmental and social risks may be mitigated.

The foundation of UBS's ESR policy framework is established in the Code of Conduct and Ethics of UBS and the *UBS in Society* constitutional document.

¹ This document has been updated following the release of the UBS Net Zero Commitment Statement in April 2021.

Our focus

Our industry is playing an active role in addressing global issues such as human rights and the protection of our environment. Climate change impacts ecosystems, societies and economies worldwide, and we support clients in achieving their goals amid the transition to a low-carbon economy. Growing environmental and human rights concerns have resulted in a fast-changing regulatory and competitive landscape, which is affecting our firm, our suppliers and our clients. In response to these emerging risks and opportunities, we are shaping appropriate solutions and commitments.

Over twenty-five years ago, UBS was one of the first financial institutions to sign the United Nations' Environment Programme's "Statement by Financial Institutions on the Environment and Sustainable Development." We were also among the first companies to endorse the UN Global Compact, we were an original signatory of the CDP, and our Asset Management business is an Investment Manager signatory to the Principles for Responsible Investment.

In 2000, our firm was a founding member of the Wolfsberg Group of banks, which was originally set up to promote good practice in combatting money laundering. In 2011, the firm was a driving force behind the establishment of the Thun Group of Banks, which has, in the meantime, published two discussion papers that seek to establish a framework to facilitate the identification of the key challenges and best practice examples for the banking sector's implementation of the UN Guiding Principles on Business and Human Rights (UNGPs). We are a member of the Roundtable on Sustainable Palm Oil (RSPO).

In 2014, we endorsed the Banking Environment Initiative's and Consumer Goods Forum's "Soft Commodities" Compact, which reconfirms our commitment to developing and implementing responsible business standards.

In 2019, we became a founding signatory of the UN Principles for Responsible Banking. The Principles constitute a comprehensive framework for the integration of sustainability across banks. They define accountabilities and require each bank to set, publish and work toward ambitious targets.

In 2020 our firm became a founding member of the Net Zero Asset Managers initiative, and a founding member of the Net Zero Banking Alliance in 2021. These industry-led alliances bring together banks and asset managers committed to reaching net zero emissions by 2050. Progress made in implementing UBS in Society objectives is reported as part of UBS's annual reporting. This reporting is reviewed and assured externally according to the requirements of the Global Reporting Initiative's (GRI) Sustainability Reporting Guideline. UBS is certified according to ISO 14001, the international environmental management standard.

- › **Refer to the UBS Sustainability Report 2020 for an overview of our external commitments and memberships**

Climate change

Climate change is one of the most significant challenges of our time. The world's key environmental and social challenges – such as population growth, energy security, loss of biodiversity and access to drinking water and food – are all closely intertwined with climate change. This makes the transition to a low-carbon economy vital. We support this transition through our comprehensive climate strategy, focusing on four pillars:

- **Protecting our own assets:** We have reduced carbon-related assets on our balance sheet to 1.9% or USD 5.4 billion as of 31 December 2020, down from 2.3% at the end of 2019 and 2.8% at the end of 2018. In 2020, we further embedded climate-related risk into our standard risk management framework.
- **Protecting our clients' assets:** We support our clients' efforts to assess, manage and protect them from climate-related risks by offering innovative products and services in investment, financing and research. We also actively engage on climate topics with companies that we invest in.
- **Mobilizing private and institutional capital:** We mobilize private and institutional capital toward investments facilitating climate change mitigation and adaptation and in supporting the transition to a low-carbon economy as corporate advisor, and / or with our lending capacity.
- **Reducing our direct climate impact:** In 2020, we achieved the target of using 100% renewable electricity. This reduces our firm's greenhouse gas footprint by 79% compared with 2004 levels.

We publicly support international, collaborative action against climate change. Our Chairman is a signatory to the European Financial Services Round Table's statement in support of a strong, ambitious response to climate change. Our Group CEO is a member of the Alliance of CEO Climate Leaders, an informal network of CEOs convened by the World Economic Forum and committed to climate action. We also continue to support the TCFD development with formal representation in the Task Force since 2016.

In April 2021 we issued a Net Zero Commitment, pledging our firm to achieve net zero greenhouse gas emissions resulting from all aspects (Scope 1, 2, 3) of our business by 2050, with intermediate milestones established to ensure progress.

- › **Refer to www.ubs.com/climate for the UBS Net Zero Commitment Statement**
- › **Refer to the UBS Sustainability Report 2020 for the full climate strategy**

Forests and biodiversity

Deforestation and forest degradation can cause biodiversity to decline. As approximately 80% of the world's documented species are found in tropical rainforests, deforestation will impact global biodiversity. Deforestation is, in fact, second only to the energy sector as a source of global greenhouse gas emissions and accounts for up to 20% of emissions, more than the entire global transport sector.

It is further estimated that more than 50% of tropical deforestation is due to the production of soy, palm oil, timber and beef. In human terms, millions of people rely directly on forests (small-scale agriculture, hunting and gathering, and harvesting forest products such as rubber). Yet, deforestation continues to cause severe societal problems, sometimes leading to violent conflict.

Recognizing these risks, we:

- became member of the Roundtable on Sustainable Palm Oil (RSPO) in 2012
- endorsed the Banking Environment Initiative's and Consumer Goods Forum's "Soft Commodities" Compact. In doing so, we aim to support the transformation of soft commodity supply chains by expecting producers to be committed to achieving full certification according to applicable sustainability certification schemes, such as the RSPO. We acknowledge that acquiring land without adequate consultation, compensation and consideration of customary land rights (commonly referred to as land grabbing) can significantly impact local communities, often smallholders who primarily rely on subsistence farming to sustain their livelihood
- have identified and will not engage in certain activities that contribute to deforestation and its related impacts (see the subsequent "Controversial activities – where UBS will not do business" and "Areas of concern – where UBS will only do business under stringent criteria" sections)

Human rights

UBS is committed to respecting and promoting human rights in all our business activities. We believe this is a responsible approach underlining our desire to reduce, as far as possible, potentially negative impacts on society. Our commitment in this important area is long standing. In July 2000, UBS was one of 43 companies that pledged to adhere to the Global Compact.

The principles of the Global Compact, today the largest corporate responsibility initiative globally, stem from the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the UN Convention Against Corruption. The United Nations took a significant step in 2011 by endorsing the United Nations Guiding Principles on Business and Human Rights (UNGPs). At this point, UBS together with other banks, formed the Thun Group of Banks to jointly consider these developments and conclusions and to share experiences and ideas regarding the implementation of the UNGPs. To this end, the Thun Group of Banks has published two discussion papers that seek to establish a framework to facilitate the identification of the key challenges and best practice examples for the banking sector's implementation of the UNGPs. Both discussion papers were also intended to inform other pertinent initiatives. The second paper, for example, focused on the Organisation for Economic Co-operation and Development's (OECD) proactive agenda on Responsible Business Conduct and in particular the OECD's 2019 guidance on due diligence for Responsible Business Conduct in General Corporate Lending and Securities Underwriting. UBS is a member of the Advisory Group to the OECD's project.

Recognizing these risks, we:

- established a UBS Position on human rights in 2006 and in 2013, we revised the firm's ESR framework to formalize accountability for human rights issues
- stipulated that we will not engage in commercial activities that make use of child labor and forced labor, or that infringe the rights of indigenous peoples (see the subsequent section "Controversial activities – where UBS will not do business")
- will continue our work internally, and externally with the Thun Group of Banks and the OECD, to understand how best to implement the UNGPs across our operations

Our standards

UBS has set standards in product development, investments, financing and supply chain management decisions, which include the stipulation of controversial activities and other areas of concern UBS will not engage in, or will only engage in under stringent criteria.

Controversial activities – where UBS will not do business

UBS will not knowingly provide financial or advisory services to clients whose primary business activity, or where the proposed transaction, is associated with severe environmental or social damage to or through use of:

- **World heritage sites** as classified by the United Nations Educational, Scientific and Cultural Organization (UNESCO);
- **Wetlands** on the Ramsar list;
- **Endangered species** of wild flora and fauna listed in Appendix 1 of the Convention on International Trade in Endangered Species;
- **High conservation value forests** as defined by the six categories of the Forest Stewardship Council (FSC);
- **Illegal fire**: uncontrolled and / or illegal use of fire for land clearance;
- **Illegal logging** including purchase of illegal harvested timber (logs or roundwood);
- **Child labor** according to ILO-conventions 138 (minimum age) and 182 (worst forms);
- **Forced labor** according to ILO-convention 29; and
- **Indigenous peoples' rights** in accordance with IFC Performance Standard 7.

The same standards apply when UBS purchases goods or services from suppliers.

In addition, UBS does not directly or indirectly finance the development, production or purchase of controversial weapons of such companies determined to fall within the "Swiss Federal Act on War Materials."

On the topic of cluster munitions and anti-personnel mines: UBS does not provide credit facilities to, nor conduct capital market transactions for, companies that are involved in the development, production or purchase of cluster munitions and anti-personnel mines. UBS does not include securities of affected companies in its actively managed retail and institutional funds and in discretionary mandates. UBS draws upon external expertise to decide whether a company is subject to the restrictions imposed by Swiss law.

Areas of concern – where UBS will only do business under stringent criteria

Specific guidelines and assessment criteria apply to transactions with corporate clients engaged in the areas of concern listed below. The guidelines and assessment criteria apply to loans, trade finance, direct investments in real estate and infrastructure, securities and loan underwriting transactions, and investment banking advisory assignments.

Transactions in the areas listed below trigger an enhanced due diligence and approval process. In addition to the assessment of regulatory compliance, adherence to UBS's controversial activities standards, as well as consideration of past and present environmental and human rights performance and concerns of stakeholder groups, these transactions require an assessment of the following criteria:

Soft commodities

- **Palm oil**: Companies must be a member of the RSPO and not subject to any unresolved public criticism from the RSPO. Companies must further have some level of mill or plantation certification and be publicly committed to achieving full certification (evidence must be available). Companies must also be committed to "No Deforestation, No Peat and No Exploitation" (NDPE).
- **Soy**: Companies producing soy in markets at high risk of tropical deforestation must be a member of the Roundtable on Responsible Soy (RTRS), or must apply a similar standard such as Proterra, International Sustainability & Carbon Certification (ISCC), Cefetra Certified Responsible Soya (CRS), and not be subject to any unresolved public criticism from these standards. When a company is not certified, it must credibly commit to RTRS or a similar standard, providing a robust time-bound plan or demonstrate a credible commitment toward an equivalent standard, to be independently verified.
- **Timber**: Companies producing timber in markets at high risk of tropical deforestation must seek to achieve full certification of their production according to the Forest Stewardship Council (FSC) or a national scheme endorsed against the 2010 Programme for the Endorsement of Forest Certification (PEFC) meta standard for timber products. Companies must also have fire prevention, monitoring and suppression measures in place.
- **Fish and seafood**: Companies producing, processing or trading fish and seafood must provide credible evidence of no illegal, unreported and unregulated fishing in their own production and supply chain.

Power Generation

- **Coal-fired power plants (CFPP)**: We do not provide project-level finance for new coal-fired power plants globally and only support financing transactions of existing coal-fired operators (>20% coal reliance) if they have a transition strategy that aligns with the goals of the Paris Agreement, or if the transaction is related to renewable energy or clean technology.
- **Large dams**: Transactions directly related to large dams include an assessment against the recommendations made by the World Commission on Dams (WCD) and the International Hydropower Association Sustainability Assessment Protocol.
- **Nuclear power**: Transactions directly related to the construction of new, or the upgrading of existing nuclear power plants include an assessment on whether the country of domicile of the client/operation has ratified the Treaty on the Non-Proliferation of Nuclear Weapons.

Extractives

- **Arctic oil and oil sands:** We do not provide financing where the stated use of proceeds is for new offshore oil projects in the Arctic or greenfield¹ oil sands projects, and only provide financing to companies with significant reserves or production in arctic oil and/or oil sands (>20% of reserves or production) if they have a transition strategy that aligns with the goals of the Paris Agreement, or if the transaction is related to renewable energy or clean technology.
- **Coal mining:** We do not provide financing where the stated use of proceeds is for greenfield¹ thermal coal mines and do not provide financing to coal-mining companies engaged in mountain top removal operations. We only provide financing to existing thermal coal-mining companies (>20% of revenues) if they have a transition strategy that aligns with the goals of the Paris Agreement, or if the transaction is related to renewable energy or clean technology.
- **Liquefied Natural Gas (LNG):** Transactions directly related to LNG infrastructure assets are subject to enhanced ESR due diligence considering relevant factors such as management of methane leaks, and the company's past and present environmental and social performance.
- **Ultra-deepwater drilling:** Transactions directly related to ultra-deepwater drilling assets are subject to enhanced ESR due diligence considering relevant factors such as environmental impact analysis, spill prevention and response plans, and the company's past and present environmental and social performance.
- **Hydraulic fracturing:** Transactions with companies that practice hydraulic fracturing in environmentally and socially sensitive areas are assessed against their commitment to and certification of voluntary standards, such as the American Petroleum Institute's documents and standards for hydraulic fracturing.
- **Precious metals:** Transactions directly related to precious metals assets that have a controversial ESR track record are assessed against the client's commitment to and certification of voluntary standards, such as the International Council on Mining and Metals' (ICMM) International Cyanide Management Code (ICMC).
- **Diamonds:** Transactions with companies that mine and trade rough diamonds are assessed on the client's commitment to and certification of voluntary standards, such as the ICMM, and rough diamonds must be certified under the Kimberley Process.

Our processes and governance

UBS applies an ESR framework to all transactions, products, services and activities such as lending, capital raising, advisory services or investments that involve a party associated with environmentally or socially sensitive activities. The framework seeks to identify and manage potential adverse impacts to the environment and to human rights, as well as the financial and reputational risks of being associated with them.

Integration in risk, compliance and operations processes

Procedures and tools for the identification, assessment and monitoring of environmental and social risks are applied and integrated into standard risk, compliance and operations processes.

- **Client onboarding:** Potential clients are assessed for environmental and social risks associated with their business activities as part of UBS's Know Your Client compliance processes.
- **Transaction due diligence:** Environmental and social risks are identified and assessed as part of standard transaction due diligence and decision-making processes in all business divisions and relevant product lines.
- **Product development and investment decision processes:** New financial products and services are reviewed before their launch in order to assess their compatibility and consistency with UBS's environmental and human rights standards. Environmental and social risks are also considered in investment decision processes and when exercising ownership rights like proxy voting and engagement with the management of investee entities.
- **Own operations:** Our operational activities and employees, or contractors working on UBS premises, are assessed for compliance with relevant environmental, health and safety, and labor rights regulations.
- **Supply chain management:** Environmental and social risks are assessed when selecting and dealing with suppliers. UBS also evaluates goods and services that pose potential environmental, labor and human rights risks during life cycle (production, usage and disposal) as part of its purchasing processes.
- **Portfolio review:** At portfolio level, we regularly review sensitive sectors and activities prone to bearing environmental and social risks. We assess client exposure and revenue in such sectors and attempt to benchmark the portfolio quality against regional and / or sector averages. Such portfolio reviews give us an accurate aggregated exposure profile and an enhanced insight into our transaction and client onboarding processes. Based on the outcome of these reviews, we can explore ways to improve the future portfolio profile along a range of risk parameters.

Clients, transactions or suppliers potentially in breach of UBS's position, or otherwise subject to significant environmental and human rights controversies, are identified as part of UBS's standard risk and compliance processes. Advanced data analytics on companies associated with such risks is integrated into the web-based compliance tool used by our staff before they enter into a client or supplier relationship, or a transaction. The systematic nature of this tool significantly enhances our ability to identify potential risk. In 2020, 2,168 referrals were assessed by our ESR unit, of which 81 were rejected or not pursued, 342 were approved with qualifications and 56 were pending.

The number of ESR referrals compared to 2019 increased, driven mainly by higher volumes of transactions processed in the Investment Bank and Personal & Corporate Banking. The increase in referrals from Asset Management can be attributed to reviews performed by the ESR unit in the context of the Climate Action 100+ engagement program.

¹ Greenfield means a new mine / well or an expansion of an existing mine / well which results in a material increase in existing production capacity.

Environmental and social risk assessments

Environmental and social risk assessments

	For the year ended			% change from
	31.12.20	31.12.19	31.12.18	31.12.19
Cases referred for assessment¹	2,168	1,889	2,114	15
by region				
Americas	373	248	288	50
Asia Pacific	551	479	718	15
Europe, Middle East and Africa (excluding Switzerland)	223	282	293	(21)
Switzerland	1,021	880	815	16
by business division				
Global Wealth Management ²	170	199	426	(15)
Personal & Corporate Banking	933	801	684	16
Asset Management	56	4	7	1,300
Investment Bank	977	849	980	15
Group Functions ³	32	36	17	(11)
by sector				
Agribusiness ⁴	244	197	277	24
Chemicals	71	61	91	16
Financial ⁵	747	722	589	3
Infrastructure	95	82	109	16
Metals and mining	228	200	249	14
Oil and gas	216	150	187	44
Technology ⁶	140	105	164	33
Transport	52	40	51	30
Utilities	144	108	176	33
Other ⁷	231	224	221	3
by outcome⁸				
approved ⁹	1,689	1,483	1,648	14
approved with qualifications ¹⁰	342	302	358	13
rejected or not further pursued ¹¹	81	100	108	(19)
pending ¹²	56	4	0	1,300

¹ Transactions and client onboarding requests referred to the environmental and social risk function. ² Wealth Management and Wealth Management Americas reported as Global Wealth Management from 2018. ³ Relates to procurement / sourcing of products and services. Corporate Center (CC) has been renamed to Group Functions (GF) ⁴ Includes, e.g., companies producing or processing fish and seafood, forestry products, biofuels, food and beverage. ⁵ Includes, e.g., banks, commodity traders, investments and equity firms. ⁶ Includes technology and telecom companies. ⁷ Includes, e.g., aerospace and defense, general industrials, retail and wholesale. ⁸ "By outcome" 2020 data is from 27.1.2021. ⁹ Client / transaction / supplier subject to an ESR assessment and considered in compliance with UBS's ESR framework. ¹⁰ Client / transaction / supplier subject to an ESR assessment and approved with qualifications. Qualifications may include ring-fencing of certain assets, conditions towards client / supplier or internal recommendations. ¹¹ Client / transaction / supplier subject to an ESR assessment and rejected or not further pursued. ¹² Decision pending. Except for few cases still in progress from 2019, all 2019 pending cases have been closed and reallocated to the other outcome categories.

Governance and oversight

In view of the many environmental and social challenges globally, these topics will continue to increase in relevance for banks. These developments therefore require regular and critical assessment of our policies and practices, based on an accurate monitoring and analysis of societal topics of potential relevance to UBS.

This process is a responsibility at the level of the Group Executive Board, which sets the overall risk appetite for the firm and resolves policy matters relating to environmental and social risks and their associated reputational risks.

The Group Chief Risk Officer is responsible for the development and implementation of principles and appropriate independent control frameworks for ESR within UBS.

All corporate responsibility and sustainability developments at UBS are monitored and reviewed by the UBS Corporate Culture and Responsibility Committee, a Board of Directors' committee of UBS Group AG. The Committee supports the Board in its duties to safeguard and advance UBS's reputation for responsible corporate conduct. In this capacity, it reviews and monitors the implementation of UBS's ESR framework.

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