

Power Sector

The RBS Environmental, Social and Ethical (ESE) risk management framework is one of several risk management systems we operate, comprising policies and processes to give us better insight into our customers' activities, help address issues of concern, minimise risks to the bank and manage stakeholder expectations. It gives clear guidance to staff on the procedures they must follow in relation to ESE risks when dealing with customers and transactions.

Our policies reflect adherence to national and international laws and regulations, wherever they apply. We have also incorporated a number of voluntary standards such as the Equator Principles and the UN Global Compact.

Scope

This policy covers RBS lending and services provided to the power sector in the following sub-sectors:

- Thermal – coal, gas and oil-fired power plants
- Nuclear
- Renewables – wind (on and offshore), solar, tidal, geothermal, biomass, hydropower.

Context

The global demand for cheaper, safer, cleaner and more efficient energy sources means the power generation sector faces considerable environmental, social and political challenges, and with emerging technologies, new challenges arise. It is vital that we have a good understanding of the sector owing to the potential adverse impact on the environment and local communities. The purpose of our policy is to understand and address these challenges, and the ESE issues which may apply.

Our ESE policy requirements

We expect and encourage our customers to demonstrate commitment and compliance to mitigating ESE risk through:

- Having in place and embedding policies and plans which demonstrate a good understanding of financial crime and ESE issues
- Demonstrating the capacity to manage these risks through good governance and controls
- A positive track record of managing ESE risks
- A commitment to transparency.

Within our policy we set out **Prohibited**, **Restricted** and **Normal** activities. We do not support customers and/or transactions involving prohibited activities.

Customers engaged in restricted activities undergo enhanced due diligence including review by a reputational risk committee or an official approver, and evaluation every one or two years. Customers undertaking 'normal' (lower risk) activities are assessed for ESE every five years.

Project-specific lending

The following prohibitions apply when lending to a specific project:

- Project finance for the construction of new unabated coal power stations.
- Project finance for the construction of nuclear power plants or uranium enrichment facilities in countries (i) subject to international sanctions; and/or (ii) that have failed to sign the Nuclear Non-Proliferation Treaty and adopt IAEA safeguard agreements on the proliferation of nuclear weapons; and/or (iii) that represent a higher geo-political risk and have perceived weaker regulatory frameworks.

General corporate lending

This table summarises our ESE policy for general corporate lending to the power sector:

Prohibited
<ul style="list-style-type: none">• Companies involved in the following activities in sanctioned countries and/or countries that have failed to sign the Nuclear Non-Proliferation Treaty:<ul style="list-style-type: none">○ Operators of nuclear power plants or uranium enrichment facilities;○ Companies involved as lead contractors in the construction or design of such plants / facilities or lead contractors involved with the transport, storage and disposal of nuclear waste in countries;○ Companies supplying uranium.• Electricity Generation companies whereby more than 40% of their unabated power generated derives from coal (based on Terawatt Hours of power generated), except where an existing customer is demonstrating a clear transition towards this threshold. Where events such as mergers and acquisition alter the trend of a transition, we will engage with the client to obtain comfort that the broader trend to reduce carbon intensity remains the customer's goal, and thus remains consistent with our approach.• Use of child labour, forced labour, modern slavery or human trafficking (as defined by international standards, including the International Labour Organization and the UK Modern Slavery Act 2015)
Restricted
<ul style="list-style-type: none">• Companies with operations that adversely impact on the Outstanding Universal Value of UNESCO World Heritage Sites• Companies operating in IUCN I - IV Protected Sites, UNESCO Ramsar Sites, UNESCO Man & Biosphere Sites and High Conservation Value areas• Companies that are responsible for the resettlement of large numbers of people relating to a single project (>5000 people)• Companies where there is evidence of direct involvement in the involuntary displacement or relocation of indigenous peoples without Free Prior & Informed Consent• Operators of nuclear power plants in International Atomic Energy Agency (IAEA) member countries which have not ratified the following international nuclear treaties:<ul style="list-style-type: none">○ Vienna Convention on Civil Liability for Nuclear Damage OR the Paris Convention on Third Party Nuclear Liability○ Convention on Nuclear Safety○ Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management• Companies involved in the following activities in countries which are (i) defined as high risk under the RBS internal country reputational risk framework and/or (ii) that have not signed the Nuclear Non-Proliferation Treaty but have engaged with the international community through bilateral agreements over their civil nuclear programmes:<ul style="list-style-type: none">○ operate nuclear power plants or uranium enrichment facilities○ lead contractors in the construction of nuclear power plants or uranium enrichment facilities○ companies designing commercial reactors○ companies involved with the transport, storage and disposal of nuclear waste• Companies operating coal-fired power plants that are not able to demonstrate monitoring of greenhouse gas (GHG) emissions or compliance with applicable GHG regulations• Electricity Generation companies whereby 30-40% of their unabated power generated derives from coal (based on Terawatt Hours of power generated)

- Companies operating hydropower plants in non-OECD countries without adequate environmental and social risk management systems in place relating to issues including dam safety, environmental impact, labour standards and resettlement.
- Companies operating one or more single biomass plant with a power capacity above 100MW that do not possess a policy or plan regarding the sustainable supply of feedstock.
- Issues identified that give cause for concern e.g. material or repeat non-compliance of environmental and social laws, a lack of adequate policies and procedures for managing ESE risks or major targeted NGO campaigns against a company (or projects the company is involved with).

Normal

- None of above apply and no material issues have been identified during the ESE screening
- Companies are expected to be in compliance with international and/or local laws relating to the ESE spheres and have policies or systems in place to manage ESE risks, including where relevant: environmental and/or social impacts; health and safety; biodiversity; greenhouse gas emissions, bribery and corruption; labour standards; human rights. Particular consideration must be given to companies that operate in countries where regulatory frameworks for environmental and social risks are less robust.