

## **Rating of 36 Banks on carbon management and reporting**

**Ethical Consumer Research Association**

**September 2020**

## **Al Rayan Bank**

In July 2020 Ethical Consumer viewed Al Rayan's websites looking for information on what the company was doing to tackle climate change. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

There was only a statement in the company's 2019 Annual Report: "As a Board, we also want the Bank to play its part in tackling the very real threat of climate change, which is why, in 2019, we approved a series of wide-ranging environmental initiatives. These include ensuring all energy consumed at the Bank's facilities comes from renewable sources – such as wind, solar or hydro - by 2021."

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

- No evidence was found, but it did have an investment Snapshot which listed oil and gas commodities. The document stated, "At any time, Al Rayan Investment or its employees may have a position, subject to change, in any securities or instruments referred to, or provide services to the issuer of those securities or instruments."

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

- No evidence was found.

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

- No evidence was found.

The company did not adequately meet any of these requirements, therefore it received Ethical Consumer's worst rating for Climate Change.

## **Banco de Sabadell (TSB)**

In August 2020 Ethical Consumer searched the Banco de Sabadell website for information on how the company managed its carbon emissions and climate impacts. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss credible ways it has cut them in the past, and ways that it will cut them in the future.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have a policy to avoid investing in fossil fuels.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count off setting towards this target.

The company did discuss reducing its carbon emissions and stated that it was doing this through switching to renewable energy suppliers and increasing efficiency as well as working to reduce emissions from business travel. It also discussed investing in renewable energy. However, there was no clear discussion of investments in high climate impact sectors such as fossil fuels or a commitment to divest from these. The company was therefore not considered to have demonstrated a reasonable understanding of its climate impacts and how to address them.

The company had the following target: "In 2015, a new CO2 emissions reduction target of 3% was set for the 2015-2020 period in Spain". While the reduction figure was in line with international agreements it only covered Spain so it was not clear whether reductions for the whole company group would also be in line.

The group reported on its scope 1 and 2 CO2 emissions. It also stated that these "these include leaks of fluorinated greenhouse gases" but it was not clear whether it covered all CO2 equivalent emissions. It reported on scope 3 emissions but stated this covered things like business travel, use of material and waste management.

Overall the company received Ethical Consumer's worst rating for carbon management and reporting and lost a whole mark under Climate Change.

## **Bank of Ireland**

In August 2020 Ethical Consumer searched the Bank of Ireland website and Annual Report 2019 for information on how the company managed its climate impacts and carbon emissions. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss credible ways it has cut them in the past, and ways that it will cut them in the future.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have a policy to avoid investing in fossil fuels.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count off setting towards this target.

The Annual Report 2019 contained information on the company's approach to reducing its carbon emissions. It stated that it had reduced carbon intensity by 40% since 2011 and highlighted its Low Carbon Pledge. It stated "We are committed to supporting a successful transition to a low carbon, climate resilient economy. We will do this by enabling customers to take action, managing climate-related risks and reducing the Group's own environmental footprint." It discussed its Sustainable Fund and the integration of climate risk strategies into its investment activities. In terms of direct operations it discussed using renewable energy, reducing carbon intensity and absolute emissions and reducing travel. However, the company did not directly address how much it invested or financed fossil fuels and whether it had plans for divestment in relation to this. It was therefore not considered to have demonstrated a reasonable understanding of how to reduce its climate impacts.

The company had the following target: Reduce carbon emissions intensity (scope 1 and 2) by 50% by 2030. It stated "To date we have achieved a 40% reduction in carbon emissions intensity (on a 2011 baseline), using intensity metric (in absolute terms we have achieved a 50% carbon emissions reduction)." However, the company did not appear to have a target for its absolute emissions and did not clearly state whether it excluded the use of offsetting towards its target.

No annual reporting of the company's scope 1, 2 or 3 emissions could be found beyond the above statement.

Overall the Bank of Ireland received Ethical Consumer's worst rating for its carbon management and reporting and lost a whole mark under the Climate Change category.

## **Barclays**

In July 2020 Ethical Consumer viewed Barclay's 2019 ESG Report, looking for information on what the company was doing to tackle climate change. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

Barclays discussed reducing its direct energy use, both in the past and in the future, as well as transitioning to renewable energy. It also discussed reducing its emissions from its financial activities, although it did not outline steps already done to address these. For example, it aimed to "Increase prohibitions on thermal coal, including no financing for companies with revenue from thermal coal mining or power of >10% by 2030." However, the company continued to invest in and finance fossil fuels. It therefore was not considered to demonstrate adequate understanding of its climate impacts.

It reported on its CO<sub>2</sub>e scope 1 and 2 emissions. However, its scope 3 reporting only covered employee business travel - a miniscule proportion of its overall scope 3 emissions. This was therefore not considered to be adequate.

It stated: "We are now setting a goal to be net zero in Scope 3, across all of our financing activity, by 2050." "Barclays already has a plan to be net zero by 2030 in Scope 1 (all direct GHG emissions) and Scope 2 (indirect GHG emissions from the consumption of purchased electricity, heat or steam)." Although it was offsetting its emissions - not considered to be an adequate reduction method - it did not appear to include offsetting in these targets. These targets were considered adequate.

As the company continued to finance fossil fuels, it received Ethical Consumer's worst rating for carbon management and reporting and lost a full mark in this category.

## Charity Bank

In July 2020 Ethical Consumer viewed Charity Bank's website, looking for information on what the company was doing to tackle climate change. Its Environmental Policy did not appear to be available online but was sent with a questionnaire response. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

-In terms of its own activities it stated: "Our head office consumption is 100% REGO-backed renewable electricity." However, Ethical Consumer did not consider REGO-backed electricity to have a positive climate impact.

-It stated "We encourage staff to use environmentally friendly commuting options, such as public transport or cycling, where possible, for business journeys." but gave no data.

-It stated "We aim, where practical, to choose new equipment on the basis that it takes into account its energy consumption and to select low energy equipment wherever possible."

"Wherever possible, we aim to hold internal meetings by means of conference calls in order to avoid unnecessary journeys." It was not clear what action was being taken and what was only an aim.

-It acknowledged that a main area of environmental impact was indirectly through its lending activities - through the projects and activities it funds; and stated:

"Our core business is making loans to charities and social enterprises, which is reflected in our Articles of Association."

"We lend across the charity and social sector; this includes renewable energy projects and hydro energy projects."

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

- It stated in its questionnaire response, "We do not finance fossil fuel projects and companies", and "In 2019, 1% of our loans were for 'conservation of the natural environment'."

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

- It stated "Charity Bank will develop an approach to emissions measurement and reporting which is proportionate to its operations in order that it can identify actions to reduce its emissions and minimise its carbon footprint", but no link was given to any reporting.

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

- No evidence was found.

Ethical Consumer expects smaller companies to meet parts one and two of the above requirements.

Although it met part one, because it was not currently reporting on scope 1 and 2 emissions, it received Ethical Consumers worst rating for carbon management and reporting.

## Citibank

In July 2020, Ethical Consumer searched the Citigroup website for information on the company's policy and reporting on its climate impacts, and downloaded several documents, including its: Finance for a Climate-Resilient Future - TCFD Report, Environmental and Social Policy Framework (April 2020) and its Global ESG Report 2019.

Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

The Global ESG Report discussed the company's direct emissions, as well as those from its financial services. It listed a number of actions the company was taking to reduce emissions, for example reducing energy consumption and using only renewable energy for all its operations. The company also appeared to be taking action to reduce the climate impact from its services. For example:

- "In 2019, for example, we worked with other banks and organizations within the shipping industry to develop and cosign the Poseidon Principles, a framework for lenders, lessors and financial guarantors to integrate climate considerations into lending decisions with international shipping clients."

- "Road testing the PACTA methodology to analyze the alignment of our credit portfolios with 2°C scenarios"

However, the company did not have a policy against funding fossil fuel projects and companies. It was therefore not considered to demonstrate adequate understanding of its climate impacts.

The company had reported its Scope 1 and 2 CO<sub>2</sub>e emissions by region. It had also gone some way to reporting its Scope 3 Emissions, looking at business air travel and thermal power emissions.

The company stated: "Citi remains fully committed to contributing to climate change solutions and global collaboration, and the Paris Agreement will remain a guiding framework for Citi's public and private sector activities around the world. We recognize that adhering to the Paris Agreement's goal of limiting global temperature increase may lead to more stringent policies and may affect certain sectors of the economy disproportionately." However, no specific emissions reduction targets were found.

The company received Ethical Consumer's worst rating for Climate Change and lost a full mark in this category.

## Co-operative Bank

In August 2020 Ethical Consumer searched the Co-operative Bank website for information on how it managed its climate impacts and carbon emissions. The following documents were viewed: Ethical Policy 2019 and Values & Ethics Report 2019.

Ethical Consumer was looking for the following:

- For the company to discuss its areas of climate impact, and to discuss credible ways it has cut them in the past, and ways that it will cut them in the future.
- For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have a policy to avoid investing in fossil fuels.
- For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).
- For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count off setting towards this target.

The company stated that it had made a "21% Reduction in carbon emissions in 2019" and discussed using renewable energy, reducing travel, and carbon offsetting. It stated: "Although we reduced our carbon emissions by a further 21% in 2019, it's impossible to reduce them to zero at the moment. We compensate for this by offsetting our residual carbon emissions by purchasing carbon credits. The Co-operative Bank has been 'beyond carbon neutral' since 2007. We can make this claim because we offset an additional 10% of our carbon emissions to address the impact our business activities have had in the past". It also stated: "For over 25 years we have declined banking services to companies involved in the extraction or production of fossil fuels and we were the first UK bank to sign the 2015 Paris Pledge not to finance the coal industry." Its Ethical Policy stated it would not provide banking services to any companies which contribute to "Global climate change, via the extraction or production of fossil fuels (oil, coal, gas and shale gas), with an extension to the distribution of those fuels that have a higher global warming impact (e.g. tar sands and certain biofuels)". The Co-operative Bank was considered to have demonstrated a reasonable understanding of its climate impacts and how to address them.

The company reported on its tCO<sub>2</sub>e emissions. It reported them by the following categories: Fuel combustion, electricity consumption, refrigerant leakages and business travel. The company was therefore considered to be reporting on its scope 1 and 2 emissions but not on scope 3 emissions which would include emissions relating to the company's investments.

The Co-operative Bank stated "We are targeting a further 10% decrease in our greenhouse gas emissions in 2020" which was considered to be in line with current international agreements.

Due to the fact that the Co-operative Bank was considered to have demonstrated a reasonable understanding, was annually reporting on scope 1 and 2 emissions and had a target inline with international agreements but was not reporting on scope 3 emissions, it received Ethical Consumer's middle rating for carbon management and reporting and lost half a mark under Climate Change.

## Coventry Building Society

In July 2020 Ethical Consumer viewed Coventry Building Society's website, looking for information on what the company was doing to tackle climate change. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

-The environment section of the 2019 Annual Report was viewed. It contained a discussion of the company's efforts to reduce environmental impacts internally, such as committing to renewable energy, installing electric charging points and using only recycled paper. It had a discussion on "how its business model is exposed to risks associated with climate change". Discussion of the impacts associated with investments and banking services was not expected for a building society. It stated that a focus for 2020 was to "Consider further ways to make our business model more environmentally sustainable" and "Adopt proposals from the Task Force on Climate-related Financial Disclosures." It also stated that "The Society's business is entirely based on low risk UK mortgages and UK savings".

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

-It stated that "The Society's business is entirely based on low risk UK mortgages and UK savings".

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

- No evidence was found.

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

-Coventry Building Society stated "we will have net zero carbon emissions by 2021. Scope 1 and 2 emissions." It was not clear whether this involved offsetting or not.

The company did not adequately meet enough of these requirements, therefore it received Ethical Consumer's worst rating for Climate Change.

## **Cumberland Building Society**

In July 2020 Ethical Consumer viewed the Cumberland Building society website, looking for information on what the company was doing to tackle climate change. The company's 2019-20 Annual Report and Accounts document was also viewed. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

Both the website and Annual Report discussed the company's emissions arising from its office and travel activities. The Annual Report stated "In 2019/2020, we have undertaken a number of actions to improve our energy efficiency and, in turn, our carbon footprint. This includes replacing old, inefficient equipment with new energy efficient alternatives. We have replaced gas boilers at Keswick and installed LED lighting in 7 branches. We have also installed four electric vehicle charging points at our head office." With regard to targets the company stated "As we improve the measurement and understanding of our carbon footprint, we will set realistic reduction targets."

The 2020 Annual Report disclosed the company's scope 1 and scope 2 carbon emissions (CO<sub>2</sub>e) data. Annual Reports from previous years were also viewed which suggested that the 2020 report was the first to include such data.

The company was considered to be implementing meaningful actions to tackle the climate impact arising from its office activity, and it discussed and disclosed its scope 1 & 2 emissions. As it was a building society with no investments in stocks and shares, it was assumed that it was not involved in any particularly damaging climate industries or projects.

It did not discuss the wider climate impacts arising from its lending activity. However, it was unclear at this stage what measures building societies could take to address any emissions arising from their mortgage lending. Therefore the company was not marked down for this.

The company did not have a quantified carbon reduction target. Overall, the company received Ethical Consumer's middle rating for Climate Change and lost a half mark in this category.

## Danske Bank

In August 2020 Ethical Consumer viewed Danske Bank website looking for information on what the company was doing to tackle climate change.

For the company to discuss its areas of climate impact, and to discuss credible ways it has cut them in the past, and ways that it will cut them in the future.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have a policy to avoid investing in fossil fuels.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count off setting towards this target.

The company discussed promoting green finance which included the following measures relating to carbon and climate change:

- Investment and lending restrictions for a number of coal and tar sands companies in line with the Paris Pledge for Action.
- Decarbonising shipping through engagement in the Getting to Zero Coalition and working with the Poseidon Principles.
- Engaging with Climate Bonds Initiative
- Carbon footprint of selected Danske Invest funds published annually in line with the UN's Montreal Carbon Pledge.

The company also discussed climate impacts of its direct operations and focused on energy efficiency, usage and sourcing as well as travel as key areas.

While the company was making steps in the right direction it did not have a clear commitment to completely divest from the fossil fuel industry. As such it was not considered to have demonstrated a good understanding on how to effectively reduce its climate impact.

Danske Bank reported on its carbon emissions. It reported on Scope 1, 2 and 3 emissions but did appear to define whether its scope 3 emissions included emissions from investments. Elsewhere in the report the company stated that it had started analysing the carbon footprint of its investments. The report also stated that the figures were for "CO<sub>2</sub>" emissions where Ethical Consumer expected companies to be reporting on CO<sub>2</sub>e emissions.

Danske Bank had the following target for 2023: "75% reduction in total CO<sub>2</sub> emissions vs. 2010". This was considered to be in line with international agreements.

As Danske Bank had not committed to divestment from all fossil fuels and was not adequately reporting its CO<sub>2</sub>e it received Ethical Consumer's worst rating for carbon management and reporting and lost a whole mark under Climate Change.

## Ecology Building Society

In July 2020 Ethical Consumer viewed the Ecology Building Society website looking for information on what the company was doing to tackle climate change. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

- Ecology Building Society used Ecotricity as its electricity supplier which was a genuine renewable energy provider. The company's headquarters were designed to be energy efficient and to generate renewable electricity.

It stated "We're dedicated to building a greener society by providing mortgages for properties and projects that respect the environment and support sustainable communities".

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

- It stated in a questionnaire response that it would "not provide any lending to the fossil fuel industry".

- Its lending was done in line with ecological policies approved by the Board of Directors (page 3 of Memorandum), to promote, encourage or support: The saving of non-renewable energy or other scarce resources; The growth of a sustainable housing stock; The development of building practices, ways of living or uses of land having, in each case, a low ecological impact.

- It stated in its Annual Report: "Ecology became the first building society to sign the United Nations Principles for Responsible Banking... committing to taking on a crucial role in helping to achieve a sustainable future." "The Society continues to participate in the European Energy Efficient Mortgage Pilot scheme, which is developing new criteria for green mortgages, and is also contributing towards a Green Finance Taskforce initiative by the Building Societies Association to support others working in the sector."

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

- it stated in a questionnaire response: "We cover scope 1 and 2 as well as some scope 3 emissions including emissions from purchased goods and services, business travel, commuting, waste disposal. We're committed to measuring the carbon impact of our lending which would come under scope 3 (investments) using the Partnership for Carbon Accounting Financials methodology." It reported annual CO<sub>2</sub>e (tonnes) in its annual report.

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

- The company stated in its questionnaire response "None have been formally agreed at Board Level, although as part of our membership of 'Investors in the Environment' we aim to reduce carbon emissions by 2% every year."

As Ecology Building Society was a small company with a turnover under £10.2m, and was discussing its areas of climate impact, including plausible ways it has cut them in the past, and ways that it will cut them in the future, it received Ethical Consumer's best rating under Climate Change.

## Handelsbanken

In July 2020 Ethical Consumer searched the Handelsbanken website for information on how the company managed and reported on its carbon emissions and climate impacts. Ethical Consumer viewed a webpage titled "Our Climate Impact" and downloaded the company's Sustainability Report 2019. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

Handelsbanken acknowledged that a large part of its climate impact was linked to its investment and finance activities. Its Sustainability Report discussed its Green Bond stating "The capital raised through the issue of Handels-banken's green bond is used for lending to clearly definable investments that lead to low carbon dioxide emissions and a climate-sustainable future. Examples of this are clean transport, sustainable forest management, green buildings, renewable energy and sustainable water management". It also stated that company did not invest in any new coal mining. It also stated that " By excluding investments in companies involved in fossil fuels, Xact Kapitalförvaltning and Handelsbanken Fonder have reduced our negative climate impact. By investing in companies that are moving away from fossil-based to renewable energy production, our actively managed funds have also contributed to target 13.1, Strengthen resilience and adaptive capacity to climate-related disasters" and "In 2019, Handelsbanken Liv increased the proportion of funds that exclude fossil fuels from 38 to 86 per cent, thus reducing our negative climate impact". However, this also clearly implied that the company was still investing in fossil fuels which was considered a sector with a high climate impact.

The Sustainability Report also contained reporting on the company's emissions. It reported its CO<sub>2</sub>e scope 1 and 2 emissions annually. It also reported its scope 3 emissions. However, it described these as "other indirect emissions from business travel, transport and use of paper" so were not considered to cover indirect emissions from the company's investment activities, for example.

In relation to direct operations the company stated: "Through the reduction in our paper usage and choosing remote meetings instead of unnecessary travelling we directly reduce our impact on the climate. This has all been made possible with digital innovations and through new insights. We measure our direct environmental impact in all six home markets, which represent 97 percent of our employees. We are continuously working to minimise the carbon dioxide emissions generated in our operations. Our goal is to continually reduce such emissions and our overall environmental impact, all in line with the Paris Agreement and the Sustainable Development Goals". However it did not appear to have any clearly defined targets.

Overall the company received Ethical Consumer's worst rating for its carbon management and reporting and lost a whole mark under Climate Change.

## HSBC

In July 2020, Ethical Consumer searched the HSBC website, its 2019 ESG Update and its Statement on Climate Change (October 2016) looking for information on what the company was doing to tackle climate change. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

The ESG Update stated:

- "We have no appetite for the development of new thermal coal mines or activity that involves mountaintop removal. All other finance of mining activity is subject to due diligence including reviewing the customer's track record on health and safety issues as well as human rights concerns. We strengthened our energy policy in 2018 so that we will not finance any new coal-fired power plants, with the targeted and time limited exceptions of Bangladesh, Indonesia and Vietnam to appropriately balance local humanitarian needs with the need to transition to a low-carbon economy. Since then, we have not agreed any project financing for any new coal-fired power plants anywhere" and

- "A key part of our sustainability strategy involves supporting our customers and their suppliers with their transition to a low-carbon economy. We aim to achieve this by providing sustainable finance, offering advice on how to structure financing solutions that align to the Paris Agreement and engaging with them on transition and physical risk."

It also discussed transitioning to renewable energy and taking other steps in its own operations. However, the company did not have a policy prohibiting the financing of and investments in fossil fuel companies and projects. It was therefore not considered to demonstrate adequate understanding of its climate impacts.

The ESG Update said that additional data could be found at website [www.hsbc.com/our-approach/measuring-our-impact](http://www.hsbc.com/our-approach/measuring-our-impact). However, this webpage redirected and could no longer be found. A document titled HSBC CO2 Emissions - Reporting Guidance 2018 was found. It suggested that HSBC had internally reported on its Scope 1 and 2 emissions since 2013 (Scope 3 only appeared to cover business travel, and therefore was not deemed adequate). However, the actual data did not appear to have been published.

No overall emissions reductions targets were found.

The company received Ethical Consumer's worst rating for Climate Change and lost a full mark under this category.

## **ICICI Bank**

In July 2020 Ethical Consumer searched the ICICI website and Annual Report 2019-20 for information on the company's management and reporting of its carbon emissions. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

While the ICICI Annual Report did have some discussion of its environmental impacts including investment in renewable energy and increasing the energy efficiency of its offices. The company's ESG Report 2019-20 stated: "Building and maintaining green workplaces is key to our environment conservation strategy. Given our large and widespread operations, we undertake multiple efforts which contribute to a sustainable reduction in our carbon footprint" but did not discuss the carbon impact of its investments. The company had reported on scope 1 and 2 emission on its website as part of its 2018-19 Annual Report. However, it stated that these were for "16 large offices and 2 data centres" only despite the company operating hundreds of branches. No more recent data on the company's scope 1, 2 or 3 emissions could be found.

The company did not appear to have any targets related to carbon, climate change or emissions.

Overall, ICICI received Ethical Consumer's worst rating for its carbon management and reporting and lost a whole mark under Climate Change.

## Leeds Building Society

In July 2020 Ethical Consumer viewed Leeds Building Society's website, looking for information on what the company was doing to tackle climate change. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

- its Annual Report stated that electricity used was a green tariff, "backed by Renewable Energy Guarantees of Origin (REGO) certificates", rather than using a provider which actually invested in renewable energy. However, it also stated, "Using a location-based approach, which does not include the purchase of renewable electricity; our emissions have decreased by 473,388kg CO<sub>2</sub>e since 2016".

- it returned a questionnaire in which it stated it was moving staff from three separate premises to a new head office in 2021 and had "purchased an existing building (vs building from new), helping to reduce the 'embodied carbon' emissions, and have since refurbished the premises to deliver high environmental performance".

Discussion of the impacts associated with investments and banking services was not expected for a building society.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

- Its Annual Report showed that its investments were in UK Government securities, Supranational bonds, Covered bonds, and Residential mortgage backed securities, not in fossil fuel industries.

- It stated in its questionnaire response, "we do not hold equity investments (shares) in other companies", and "we do not finance anything other than homes".

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

- The company had reporting on Scope 1 and 2 CO<sub>2</sub>e emissions from fuel and electricity. Its Scope 3 emissions were for air, car and train and did not include investments, but as a building society this was not expected.

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

- Its questionnaire response stated, "in 2016 Leeds Building Society published an external target to "reduce carbon emissions within its business operations by 150,000 kg CO<sub>2</sub> by 2020." This target was for the end of 2020 and future targets were under review. It also stated "Carbon Offsetting does not currently count towards meeting our 2020 target."

The company met most of these requirements, therefore it received a middle rating under Climate Change.

## **Lloyds Bank**

In July 2020 Ethical Consumer viewed Lloyd's 2019 annual report, as well as its completed questionnaire, looking for information on what the company was doing to tackle climate change. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

The report stated that it was reviewing its portfolio to establish financed emissions. Based on this it said it would:

- Identify new opportunities to support our customers and clients and finance the UK transition to a low carbon economy
- Identify and manage material sustainability and climate related risks across the Group, disclosing these, their impacts on the Group and its financial planning processes, in line with the TCFD framework
- Use our scale and reach to help drive progress towards a sustainable and resilient UK economy through engagement with customers, communities, industry, Government, shareholders and suppliers
- Embed sustainability into the way we do business and manage our own operations in a more sustainable way

It stated: "We have provided more than £4.9 billion in green finance since 2016 through our Clean Growth Finance Initiative, Commercial Real Estate Green Loans Initiative, Renewable Energy Financing, and green bonds facilitation."

It stated: "Our statement on coal has been updated and made more ambitious. We continue with our policy of not financing new coal fired power stations. We have now tightened our requirements for providing general banking or funding, and now require new clients to have less than 30 per cent of their revenue from the operation of coal fired power stations and/or coal mines (previously less than 50 per cent).

"In addition, existing customers whose overall operations include coal mining and coal power generation or who supply equipment or services to the sector will be expected to explain how they plan to reduce their reliance on revenue from coal fired power stations and/or coal mines. This includes reducing such revenue to less than 30 per cent by 2025 and, where relevant, to eliminate UK coal power generation in line with UK Government commitments."

It had published a table showing that it had reduced its financing for coal mining, oil and gas, electric and gas utilities, transportation, cement, chemicals and steel manufacture, and UK motor finance. However, it did not have a policy excluding the financing of or investments in fossil fuel sector, as was expected of finance companies.

It reported on scope 1 and 2 emissions (market based). Its questionnaire stated:

"Reported Scope 3 emissions relate to business travel and commuting undertaken by colleagues and emissions associated with waste and the extraction and distribution of each of our energy sources; electricity, gas and oil." As the company's key scope 3 emissions would be from its financial services, rather than any of the above, this was not considered adequate. Its questionnaire did, however, state: "During the course of 2020, we intend to conduct a review of our portfolio to establish our current financed emissions and set appropriate metrics and targets for material sectors. In addition, we are working to understand our supply chain emissions and will be publicly disclosing them in the near future." This was considered to be a positive step.

The following target was found: ">50% by 2030 we aim to help reduce the emissions we finance by more than 50 per cent by 2030." Its questionnaire also stated: "We have a long-term target to reduce our carbon emissions by 80% by 2050... We do not off-set as part of this strategy, and are committed to ensuring our future targets are also realised without reliance on off-setting. " The targets were therefore considered adequate.

As the company still invested in and provided financing for fossil fuel companies, it received Ethical Consumer's worst rating for Climate Change.

## **Metro Bank**

In July 2020 Ethical Consumer viewed Metro Bank's 2019 Annual Report, which included information on its approach to the environment, looking for information on what the company was doing to tackle climate change. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

The company mentioned supporting FANS (customers) to reduce their environmental impacts but focused on direct operational emissions. It listed actions taken in store, e.g. electric car chargers, recycling of coffee grounds, and control of AC systems.

More significantly, it stated: "We believe our business model increases our resilience to climate-related risk. Our focus on supporting small and medium-size enterprises, exclusively based in the UK, helps to mitigate our exposure to material international environmental risks. We consider a variety of issues when working with new customers, including exposure to highrisk industries. Such industries include mineral extraction, where for example, any decision regarding the account would require further investigation and escalation to management. We do not currently lend to carbon-intensive industries and have no plans to do so." Although it was positive that the company discussed the environmental impacts from its financing, and excluded carbon-intensive industries, the discussion did not include any steps to reduce past or future emissions.

The company reported its scope 1 and 2 emissions, but did not report scope 3 emissions. The bank also returned a completed questionnaire, which stated: "Scope 3 emissions are collated and reported internally and we have decided that we will report on these next year."

The questionnaire said: "The Bank does not currently have any public targets for CO2e reductions".

The company received Ethical Consumer's worst rating for Climate Change and lost a full mark in this category.

## Monzo

In July 2020, Ethical Consumer searched the Monzo website for information on the company's approach to the climate change. A very brief section was found on a page about social impact.

Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

The page stated:

"We focus on 4 areas for improvement: card production and delivery, our offices, employee travel and the energy used to power our servers.

Here's what we're doing to minimise our impact:

"Our servers are carbon neutral! They're hosted in an AWS facility plant in Dublin, and all the non-renewable energy used by our servers gets offset by Amazon.

"The packaging for our cards is fully recyclable.

"Our offices in Cardiff and London both do Environmentally Preferred Purchasing (EPP), so our washrooms are stocked with animal friendly and organic products.

"All UK monzonauts can be part of the Cycle to Work scheme, so it's more convenient to use environmentally friendly transport for their commute. Our Cardiff office has also committed to the Business Healthy Travel Charter Wales."

The company did not make any commitment nor suggest any actions it would take to reduce its ongoing carbon impacts. It therefore was not considered to demonstrate adequate understanding of its climate impacts.

No further information on any of the above was found.

The company received Ethical Consumer's worst rating for Climate Change.

## NS&I

In August 2020 Ethical Consumer viewed the NS&I website, looking for information on what the company was doing to tackle climate change. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

Its 2018/19 CSR report was viewed. This had environmental performance figures, and targets including: Reduce carbon emissions from energy consumption by at least 20% from the 2009/10 baseline year by end of March 2015 and by 30% by March 2020.

It stated, "Overall, we saw a 10% decrease in total energy consumption across the estate against the 2017/18 levels and an 87% reduction against the 2009-10 levels, all helped by the rationalisation of the NS&I estate and a move to more modern equipment and ways of working."

Much of the reduction against its baseline year appeared to be attributed to its operational partner, Atos: "In 2014-15, Atos were successful in transferring all their electricity supplies to be sourced from renewable energy, hence the massive reductions in CO<sub>2</sub>e emissions." It was not clear whether this was sourced directly from renewable providers, or was REGO backed supply which was not considered by Ethical Consumer to be a genuine reduction.

Moreover, it did not discuss ways it would cut climate impacts in the future.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

- No evidence was found.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

- No evidence of Scope 3 reporting was found.

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

- No future targets were found.

The company did not adequately meet any of these requirements, therefore it received Ethical Consumer's worst rating for Climate Change.

## **Nationwide**

In July 2020, Ethical Consumer viewed the Nationwide website and 2019 Responsible Business Report, looking for information on what the company was doing to tackle climate change. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

The report discussed direct emissions from its electricity use, and travel and using renewable energy, having a low emissions vehicle fleet and allowing home working to reduce business travel.

The report outlined several goals including:

- sustain the reduction in our carbon emissions and having switched our electricity supply to 100% renewable sources, understand how we can reduce our energy usage
- develop new solutions to reduce the impact of our employees' travel
- understand what more we can do work with our suppliers, colleagues and members to tackle climate change, waste reduction, and water usage.

It also mentioned "providing members with products and services that help them live low-carbon lives and reduce the impact of climate change."

Although it mentioned working with members to tackle climate change, it did not directly acknowledge the climate impact from its financial services - where majority of its impact would lie. It was therefore not considered to demonstrate adequate understanding of its climate impacts.

The company said that it had published 2020 targets. However, a Google search and search of its 2018 Annual Report and Accounts could not find a carbon reduction target.

## **Newcastle Building Society**

In July 2020 Ethical Consumer viewed Newcastle Building Society's website looking for information on what the company was doing to tackle climate change. No information was found.

Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

The company did not meet any of these requirements, therefore it received Ethical Consumer's worst rating for Climate Change.

## **Oaknorth Bank**

In July 2020 Ethical Consumer viewed Oaknorth Bank's website, looking for information on what the company was doing to tackle climate change. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

- Although it discussed the impact of its lending, it did not discuss cutting its own operational impacts.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

- In its 2019 Annual Report it stated, "We don't lend to businesses that are engaged in - oil or gas production", "We target our lending to have a direct positive environmental and social impact", "Our exposure to carbon un-friendly lending is minimized as we lend primarily to new housing and new growth trading businesses who tend to be more technologically advanced and meet the applicable energy efficiency standards."

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

- It stated, " Our approach in relation to the impact of emissions from our clients and all other indirect emissions (Scope 3) is in progress and will be formalised in 2020". It did not report any emissions figures.

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

- It stated, "We are proud to be one of the first banks globally to become net carbon zero by offsetting our estimated direct emissions (Scope 1) and electricity-generated indirect emissions related to suppliers of our IT infrastructure (Scope 2)."

Although it appeared to have a positive lending policy, the company did not adequately meet any more of these requirements, therefore it received Ethical Consumer's worst rating for Climate Change.

## **One Savings Bank**

In July 2020 Ethical Consumer viewed the One Savings Bank website, looking for information on what the company was doing to tackle climate change. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

-The company mentioned electric vans which the Maintenance team use to travel between sites, and electric charging points now available for employees. It stated that 2019 "included undertaking an 'ESOS' energy assessment, introducing a Cycle to Work scheme and providing support for employees to choose ultra-low emissions vehicles." There was no mention of whether the company had a policy on investments or lending in relation to climate impact.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

- No evidence was found.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

-The company had some reporting on Tonnes CO<sub>2</sub>e from fuel, facilities and electricity, but no detail of Scope 3 emissions.

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

- No evidence was found.

The company did not adequately meet any of these requirements, therefore it received Ethical Consumer's worst rating for Climate Change.

## **Paragon Bank**

In July 2020 Ethical Consumer viewed Paragon Bank's website, looking for information on what the company was doing to tackle climate change. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

- it stated, "Paragon is mainly engaged in mortgage, consumer and commercial finance. As a result, its overall environmental impact is considered to be low."

- regarding internal operations it mentioned recycling and a water saving initiative, as well as various aims, but without any performance data.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

- No evidence was found.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

- it reported on CO2 but not CO2e.

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

- No evidence was found.

The company did not adequately meet any of these requirements, therefore it received Ethical Consumer's worst rating for Climate Change.

## **Post Office**

In July 2020 Ethical Consumer viewed the Post Office website, looking for information on what the company was doing to tackle climate change. No information was found.

Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

The company did not meet any of these requirements, therefore it received Ethical Consumer's worst rating for Climate Change.

## **Principality Building Society**

In July 2020 Ethical Consumer viewed Principality Building Society's website, looking for information on what the company was doing to tackle climate change. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

-Its 2019 Annual Report was viewed which stated, "We know from our carbon footprint that heating, lighting and general electrical use are the main contributors to our energy usage, so we are working hard to reduce their usage across our property estate." It gave details of energy saving initiatives at its head office and in its branches. It discussed recycling and energy efficient equipment. It said it had an energy saving plan and listed KPIs for road miles travelled and energy usage in Kwh which had fallen year on year from 2017-2019. However this data did not appear to be independently verified and no targets were found. Discussion of the impacts associated with investments and banking services was not expected for a building society.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

- No evidence was found.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

- No evidence was found.

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

- No evidence was found.

The company did not adequately meet enough of these requirements, therefore it received Ethical Consumer's worst rating for Climate Change.

## RBS Natwest

In July 2020, Ethical Consumer viewed the Royal Bank of Scotland website for information on what the company was doing to tackle climate change. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

A page titled 'Approach to climate change' was found. This stated:

"Our ambition is to be a leading bank in the UK & RoI helping to address the climate challenge; by making our own operations net carbon zero in 2020 and climate positive by 2025, and by driving material reductions in the climate impact of our financing activity."

It outlined steps that it had taken or was taking, including switching to electric vehicles, funding and financing of sustainable energy (target of £10 billion for 2018-2020), ongoing ESG management.

Its questionnaire stated: "We are setting ourselves the challenge to at least halve the climate impact of our financing activity by 2030 and intend to do what is necessary to achieve alignment with the 2015 Paris Agreement."

However, as the company did not have a policy prohibiting the financing of and investment in fossil fuel projects and companies, it was not considered to demonstrate adequate understanding of its climate impacts. The company responded to the rating, stating: "We operate an ESE risk management framework which has been live since 2011. As part of this process, we conduct due diligence on customers, projects and transactions that present heightened ESE risk. NatWest Group has developed ESE risk acceptance positions on industry sectors where enhanced due diligence is conducted. Sector ESE risk acceptance positions define the level of ESE risk the bank is prepared to accept, and our expectations of companies to manage ESE risks in the relevant sectors." It provided details of its ESE risk acceptance positions. While these prohibited some of the most carbon intensive fossil fuel companies, it did not prohibit financing of fossil fuels overall.

The company had reported its scope 1 and 2 CO<sub>2</sub>e emissions in its 2019 Annual Report. Its scope 3 emissions reporting only covered business travel and therefore were not considered adequate. Regarding scope 3 emissions reporting, its questionnaire stated: "We plan to quantify our climate impact and set sector-specific targets by 2022." This was considered to be a positive step.

Regarding its carbon target, its questionnaire stated: "our goal is that our own direct operations are net zero in 2020 and climate positive by 2025."

Online, it stated: "We will maintain this level of offsetting and simultaneously reduce emissions from our own operations a further 25% by 2025 from our 2019 baseline, so that we offset more carbon than we emit. This will move us beyond net zero to become climate positive." Ethical Consumer did not consider offsetting an adequate approach to reducing climate impacts, and therefore did not accept the company's target to be carbon positive by 2025. However, its targets also involved a 25% reduction in direct emissions from 2019-2025: this was considered an adequate target.

As the company did not demonstrate reasonable understanding of its climate impacts, it received Ethical Consumer's worst rating for Climate Change and lost a full mark in this category.

## **Revolut**

In July 2020 Ethical Consumer viewed the Revolut website, looking for information on what the company was doing to tackle climate change. No information was found.

Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

The company did not meet any of these requirements, therefore it received Ethical Consumer's worst rating for Climate Change.

## Sainsbury

In July 2020 Ethical Consumer viewed Sainsbury's website, looking for information on what the company was doing to tackle climate change. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

- in its Annual Report 2019 it stated it had "a bold ambition to be the Greenest Grocer by cutting carbon emissions from our heating, cooling, lighting and logistics".

- it stated " we have reduced energy use by four per cent year-on-year, through our colleague behavioural change programme"

- and "We achieve further emissions reductions by sourcing 18 per cent of our electricity from on-site renewables generation and renewable power purchase agreements"

- In its Sustainability Update 2019/20 it stated "Aerofoil equipped fridges are delivering carbon savings of almost 9,000 tCO<sub>2</sub>e per year" and also listed savings from lighting controls and LEDs.

The Sainsbury's Bank 2020 annual report stated that "investments include the Bank of England's (BoE) reserve account, UK government securities (gilts or Treasury bills), multilateral development bank securities, government guaranteed agency securities, covered bonds and asset backed securities." It was not believed to have investments in fossil fuels.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding it's climate actions, and to have relevant sector-specific climate policies in place.

- it was not known to be directly involved in the above industries, although it did sell petrol.

- regarding relevant sector-specific climate policies, it stated in its CDP Climate Change Disclosure 2019 that "Since 2009, we have been implementing a programme to replace HFC refrigerants in stores with more environmentally friendly natural types such as CO<sub>2</sub>", "Due to the high global warming potential of R404-a, we have been particularly focussing this year on swapping out R404a to a lower GWP HFC gas, as well as increasing our efforts around leak detection."

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

- Sainsbury's reported its Scope 1&2 emissions in its annual report.

- It reported a figure for Scope 3 emissions of Purchased goods and services in its CDP Climate Change Disclosure 2019, of CO<sub>2</sub>e 12,546,000

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

- It stated in its Sustainability Update 2019/20 that "As part of our Net Zero by 2040 plan, we have committed to investing £1 billion over twenty years towards becoming a Net Zero business across our own operations by 2040, aligned to the highest ambitions of the Paris Climate Change Agreement."

- it also said it had signed up to setting a science-based target with the Science Based Targets initiative (SBTi), but no target appeared to yet be in place.

The company adequately met the above requirements, but was a petrol retailer, therefore it received Ethical Consumer's middle rating for Climate Change.

## Santander

In July 2020, Ethical Consumer viewed Banco Santander's website for its environmental policy. A chapter titled, Responsible Banking: Consolidated non-financial information statement, accompanying the bank's 2019 annual report was found. The company also returned a completed questionnaire.

Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

The report discussed financing renewable energy and other 'green finance' areas. It stated that the company had raised or facilitated £18.6bn in green finance in 2019, and aimed to raise or facilitate 120bn by 2025.

It stated: "During 2019 we have started implementing measures to fulfil the Collective Commitment on Climate Action. A key action was our participation in the PACTA (Paris Agreement Capital Transition Assessment)<sup>1</sup> pilot led by 2° Investment Initiative, along with 16 other banks. This recognised methodology allows banks to study the alignment of their corporate lending portfolios with 2°C benchmarks. It is a science based approach that uses scenarios to provide valuable information to banks in steering their portfolios to be aligned with the Paris Agreement on climate. The methodology focuses on high climate impact sectors including fossil fuels (oil & gas, coal), power, automotive, cement, steel, and shipping.

"The initial analysis shows that against today's Corporate economy our portfolio compares favourably - in fossil fuels with lower coal exposure, and in power with a high exposure to renewables energy. Santander's portfolio projected to 2024 is broadly in line with the mix of technologies in the International Energy Agency scenarios to align to Paris targets<sup>3</sup>. To remain aligned with the Paris targets beyond 2024, we would need to shape our portfolio and engage with our clients so that the share of renewables and gas increases while the share of coal falls."

It also stated: "Santander has committed to have 100% of electricity from renewable sources by 2025. Furthermore, we have committed to become carbon neutral by offsetting all the emissions generated by our own operations from 2020 onwards." Offsets were not considered to be an effective form of carbon reduction.

Although the company was taking steps to reduce its climate impacts, it did not have a policy to prohibit the financing of and investments in fossil fuels. This was considered necessary for the finance sector.

It reported its scope 1 and 2 emissions. However, its scope 3 emissions reporting only covered employees' travel to work. This was not considered adequate, as the bank's core emissions would be from scope 3 financing of and investment in climate intensive projects. It stated "Santander is working with different methodologies (PACTA, PCAF...) to report scope 3 emissions", in its questionnaire.

Its questionnaire included a link to a PDF titled 'The Santander Way', which included the company's targets. Amongst these was a target to be 'carbon neutral' by 2021 in its own operations. However, this did not include its scope 3 emissions - which would be by far its largest impact. The questionnaire also stated that the target would be achieved by plans 'to reduce emissions and offset the pending emissions'. Offsetting was not considered an effective way to tackle climate impacts.

The company received Ethical Consumer's worst rating for its carbon management and reporting, and lost a full mark in the Climate Change category.

## **Skipton Building Society**

In July 2020 Ethical Consumer viewed Skipton Building Society's website, looking for information on what the company was doing to tackle climate change. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

-In its annual report It stated that "In May 2019 we switched our electricity tariff to a renewable energy source" but it was not clear whether this was REGO-backed or a supplier which actually invested in renewable energy.

- Its Sustainability Report stated that "From 2017 to 2018, we reduced our carbon emissions from 2,703 tonnes to 2,321 tonnes". Some of this was through a colleague Liftshare Scheme.

Discussion of the impacts associated with investments and banking services was not expected for a building society.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

- No evidence was found.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

- No evidence was found other than a total figure given of 4,564 tonnes. The unit of measurement was not given.

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

-It said it had a target of "Halving our carbon footprint by the end of 2022". It was not clear whether this involved offsetting or not.

The company did not adequately meet any of these requirements, therefore it received Ethical Consumer's worst rating for Climate Change.

## Starling Bank

In July 2020 Ethical Consumer viewed the Starling Bank website as well as the company's most recent Annual Report (2017-18), looking for information on what the company was doing to tackle climate change. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

The company website contained the following statements:

"We do not provide banking services to organisations that use excessive power to systemically promote public behaviour that is harmful to individuals, groups or to the whole of society in order to maximise their own profits. This may include, for example, arms manufacturers and tobacco companies. We do not invest in such organisations or take investment from them."

"We are committed to the pursuit of ecological sustainability and to combating climate change. As a branchless, digital and largely paperless bank built in the cloud, we endeavour to protect the natural environment through practising energy and resource efficiency, recycling and using sustainable waste management."

Ethical Consumer also viewed Starling Bank's completed Ethical Consumer questionnaire. In addition to directing the reader towards the above statements on their website, it stated: "We are currently looking into scope 3 emissions." The questionnaire also stated "As a paperless, branchless bank hosted in the cloud, we have a smaller carbon footprint than the old banks. We are an app-based bank. Our only physical touchpoint with our customers other than their smartphone, is their debit card. Our main cloud service provider is Amazon Web Services (AWS) Dublin, which is carbon neutral. We do not invest in or take investment from any energy companies."

The company did not discuss any of its climate impacts, or ways to cut them, in detail. Nor did the company provide any sector-relevant climate policies or carbon emissions data.

## Tesco

In July 2020 Ethical Consumer searched the Tesco website for information on how the company managed its climate impacts, especially in relation to carbon. Ethical Consumer downloaded the "Little Helps Plan Report 2019/20" and Tesco's Annual Report 2020. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

The Annual Report stated "We are on track to reduce absolute carbon emissions from our operations from 2015/16 levels by 35% by 2020, 60% by 2025 and 100% by 2050. To help us meet these targets, we have committed to source 100% of our electricity from renewable sources by 2030". Tesco was considered to have adequate carbon reduction targets. Its Little Helps Plan report also stated that it had 2030 reduction target of 85%.

Tesco's 'Little Helps Plan' stated "In 2019/20 we reduced our absolute carbon emissions (market-based) across the Group by 37% to 2.16million tCO<sub>2</sub>e, achieving our 2020 target of 35% absolute carbon reduction from our operations compared to our 2015/16 baseline". It stated: "In order to meet these stretching targets, we prioritised the biggest emissions hotspots in our operations". It outlined these as electricity and heating; refrigeration; and transportation/distribution. It provided further detail on steps it was taking to reduce the emissions from each of these areas. It also mentioned supply chain emissions and had targets for reducing emissions here. For agriculture these were a reduction of 7%, 12% and 15% by the years 2020, 2025 and 2030 respectively, however it stated the baseline would be established in 2020/21. For food manufacturing and production sites its target reductions were 7%, 20% and 35% for the same year with a baseline of 2015/16. Tesco also stated that it was committed to source 100% of our electricity from renewable sources by 2030 as part of its plan to reduce emissions.

While Tesco was clearly making steps to reduce its carbon emissions it was also a petrol retailer which was considered a high climate impact sector and Tesco did not appear to have any discussion in relation to this in its Annual Report or Little Helps Plan. It was therefore not considered to have demonstrated a reasonable understanding of how to address its specific climate impacts. The report also made no mention of its banking subsidiary and related climate impacts.

Tesco was reporting on its scope 1 and 2 CO<sub>2</sub>e emissions in its Annual Report. For scope 2 it provided data using both the market-based and location-based methods.

The company also reported on scope 3 emissions but a webpage titled "Method for calculating our carbon footprint" described these as "Under Scope 3 emissions we report business travel and emissions from distribution arranged by Tesco but provided by third parties (including secondary distribution globally and emissions from primary distribution in the UK). We include primary distribution for the UK only as we have a greater influence over how products are delivered to our distribution centres than in the rest of the Tesco

Group. Business travel includes travel by air, rail, taxi and short-term hire car. Additionally, Scope 3 emissions include transmission and distribution impacts of electricity and heat supply and well-to-tank embodied impacts of fuel". Ethical Consumer expected scope 3 reporting to cover emissions from at least tier one suppliers.

## Triodos

In July 2020 Ethical Consumer viewed the Triodos Annual Report 2019, looking for information on what the company was doing to tackle climate change. Ethical Consumer was looking for the following:

- For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

Triodos discussed the climate impact of its direct operations, for example refurbishing buildings to reduce carbon impact. It also discussed the impact of its financial activities, i.e. its lending and investments.

- For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

In its 'Minimum Standards' Triodos listed a number of sectors and companies it would not provide finance for, which included the fossil fuel industry (including coal, oil and gas).

- For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

Triodos had partnered with Dutch Partnership for Carbon Accounting Financials (PCAF) in order to report its carbon emissions. It reported its scope 1, 2, and 3 emissions, including those of its loans and investments.

- For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

The company stated, "In 2015, at the landmark Paris Climate Conference, Triodos Bank co-signed a Dutch Carbon Pledge to measure and disclose its greenhouse gas (GHG), or carbon emissions and to ensure these emissions are in line with the ambitions of the Paris Agreement." It aimed to pursue this, in the most part, but financing a sustainable economy. It reported how much carbon had been sequestered in 2019 and avoided as a result of its activities.

Triodos had made a clear commitment to carbon reduction targets in line with international agreements and was reporting thoroughly on its yearly emissions.

Overall the company the company received Ethical Consumer's best rating for climate change.

## Virgin Money

In July 2020 Ethical Consumer searched the Virgin Money website and Annual Report 2019 for information on how the company managed its climate impacts and reported on its carbon emissions.

Strong carbon management and reporting would include demonstration by the company that it had a reasonable understanding of how to address its specific climate impacts, annual reporting of CO<sub>2</sub>e, reporting of scope 3 emissions and a future carbon emissions target in line international agreements.

The Annual Report stated: "We are committed to combating climate change and doing our bit to limit the global temperature rise to 1.5 degrees Celsius this century, in line with the Paris Agreement. We are targeting 'net zero' carbon emissions by 2030. Although our direct environmental impacts are comparatively low, we have a major role to play in 'greening finance': helping our customers, partners and colleagues transition to a low-carbon economy". It also stated that it had lent £31million to the renewables sector and the company's subsidiary Virgin Money Unit Trust also had a specific Climate Change fund which "only invests your money in hand-picked companies with strong social or environmental credentials". The company did not clearly discuss divestment from fossil fuels and had been marked down for its investments in BP Plc and Royal Dutch Shell. It was therefore not considered to have demonstrated a reasonable understanding of how to address specific climate impacts.

The company was reporting on its scope 1, 2 and 3 GHG emissions. However, it defined its scope 3 emissions as those that "relate to business travel undertaken by all colleagues using rail, private vehicles, hired vehicles, contracted taxi services, air travel, waste, water and paper" and in a questionnaire response sent to Ethical Consumer in July 2020 stated "We do not cover emissions from our investments".

The company had a target of achieving 'net zero' operational emissions by 2030 (and stated in its questionnaire response that it was not counting carbon offsets towards this) and had a previous target of reducing greenhouse gas emissions by 9% by 2019 (against a 2016 baseline). The company had achieved its 2019 target but had not yet published new targets.

Overall, Virgin Money received Ethical Consumer's worst rating for carbon management and reporting and lost a whole mark under Climate Change.

## **West Bromwich Building Society**

In July 2020 Ethical Consumer viewed West Bromwich Building Society's website, looking for information on what the company was doing to tackle climate change. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

-Its 2020 Annual Report was downloaded. This stated that it had undertaken considerable work to understand the environmental impact of its Investment Property subsidiary West Bromwich Homes Limited, with action being taken to ensure the portfolio meets the newly introduced EPC standards. EPC stood for Energy Performance Certificate. It went on to discuss improving the efficiency of vehicles and IT.

Discussion of the impacts associated with investments and banking services was not expected for a building society.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

- No evidence was found.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

-It had limited data on Energy Use 2019-2020, which did not appear to be independently verified, and was in CO2 (tonnes) p.a rather than CO2e.

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

-It stated, "we will become carbon neutral for all operations under our direct control by 2035". It was not clear whether this involved offsetting or not.

The company did not adequately meet enough of these requirements, therefore it received Ethical Consumer's worst rating for Climate Change.

## **Yorkshire Building Society**

In July 2020 Ethical Consumer viewed the Yorkshire Building Society website, looking for information on what the company was doing to tackle climate change. Ethical Consumer was looking for the following:

For the company to discuss its areas of climate impact, and to discuss plausible ways it has cut them in the past, and ways that it will cut them in the future.

-Its website contained sections on carbon footprint, energy, waste, and travel. Information on environmental impact of investments could no longer be found, as it had in the past. However, discussion of the impacts associated with investments and banking services was not expected for a building society.

For the company to not be involved in any particularly damaging projects like tar sands, oil or aviation, to not be subject to damning secondary criticism regarding its climate actions, and to have relevant sector-specific climate policies in place.

- No evidence was found.

For the company to report annually on its scope 1&2 greenhouse gas emissions (direct emissions by the company), and to go some way towards reporting on its scope 3 emissions (emissions from the supply chain, investments and sold products).

-It stated that it had "Independent assurance of our carbon footprint (2012-2019) and data related to our use of electricity, gas, business travel, water use and waste generation". Tables on carbon footprint were found in its 2019 Annual Report, verified by Ricardo Energy & Environment. These included Scope 1-3, in tCO<sub>2</sub>e. Scope 3 figures did not include investments, but this was not expected for a building society.

For the company to have a target to reduce its greenhouse gas emissions in line with international agreements (counted as the equivalent of at least 2.5% cut per year in scope 1&2 emissions), and to not count offsetting towards this target.

- No evidence was found.

As the company discussed its impacts and reported on Scope 1-3 emissions, it received Ethical Consumer's middle rating for Climate Change.