

 **GOLOMT BANK**

The background of the entire page is a dark blue, starry night sky. Overlaid on this is a photograph of a grand, classical-style building with multiple stories, columns, and balconies. The building is illuminated with warm, golden lights, creating a contrast with the dark sky. The image is framed by several overlapping, semi-transparent geometric shapes: a large white circle on the left, a yellow circle on the right, and several yellow and white lines forming a complex, multi-layered pattern that resembles a stylized 'G' or a series of nested shapes.

ESG REPORT

2025

MSE ESG REPORT

Name of issuer:	Golomt Bank JSC
Issuer code (MSE symbol):	GLMT
Sector/industry (MSE sector):	Financial services
Reporting boundary (legal entities/subsidiaries included in this report):	
Reporting period:	2025.01.01-2025.12.31
Full name, job title, contact information of the person responsible for this report:	Oyunzaya Otgonbayar, Sustainable finance manager, oyunzaya.o@golomtbank.com , 90639909
Full name, job title, contact information of CEO or Chairman of the Board:	Odonbaatar Amatzaya, CEO
Sign off by CEO or Chairman of the Board:	

Area	Indicator	Description	Answer (previous year)	Answer (reporting year)	Unit of measure for target/ indicator	Notes	Explain	References
MS	Sustainability Management System Indicators							
MS1.1	Sustainability Management System	Senior management commitment Does your company have a sustainability commitment statement in place?	Yes	Yes		Golomt Bank on September 22, 2019 in New York, USA, became one of the Founding Signatories of the Principles for Responsible Banking, committing to align strategically its business with the Sustainable Development Goals and the Paris Agreement on Climate Change. The Bank reports annually on its progress and implementation. Additionally, Golomt Bank adheres to the eight principles of MSFA.	<i>If no, explain</i>	GRI 102
MS2.1		Sustainability policy and procedures Does your company have a sustainability policy with targets?	Yes	Yes		Golomt Bank first adopted Sustainable Finance Policy in 2015. In 2019, we broadened the scope of the policy and upgraded into "Sustainable Development Policy" which outlines bank's overall principles towards environment and society at all aspect of operations. Revised in 2024, it serves as a policy that defines the Bank's core principles and standards for its operations, as well as environmental and social risk management in its lending activities. Please refer to the policy summary at the following link: https://golomtbank.com/about-bank/sustainable-development/sustainable-finance	<i>If no, explain</i>	GRI 103, ISO 14001
MS2.2		Does your company have a set of sustainability procedures?	Yes	Yes			<i>If no, explain</i>	GRI 103, ISO 14001
MS3.1	Governance structure	Does your company have dedicated committees that are entirely/partially responsible for sustainability?	Yes	Yes		Golomt Bank established its Sustainable Development Committee in 2022. The committee is responsible for overseeing and managing the implementation of the Bank's sustainable financing and development strategy.	<i>If no, explain</i>	GRI 102
MS3.2		Does your company have a dedicated ESG/sustainability director/s (full-time part-time) at the board level?	No	No			<i>If no, explain</i>	GRI 102
MS3.3		Does your company have a dedicated ESG/sustainability director/s (full-time part-time) at the executive level?	Yes	Yes		The Sustainable Development Committee is chaired by the Chief Executive Officer and meets semi-annually to discuss sustainability-related matters. The International Banking Division, which oversees the Sustainable Finance Department, also operates under the direct supervision of the CEO. Organizational structure available at: https://golomtbank.com/about-bank/management/bank-structure	<i>If no, explain</i>	GRI 102
MS3.4		Does your company have a dedicated ESG/sustainability officer (full-time part-time) at the operational level?	Yes	Yes		Upon the Executive Committee's Decree No.21/03, dated December 21, 2021, a dedicated Sustainable Finance Department was officially established. The Department oversees the Bank's overall implementation of the sustainability related strategies and policies, ensure alignment with the international and national standards, assessment of E&S risks of clients, identification and validation of green and sustainable use of proceeds, and nationally and internationally mandated reporting standards	<i>If no, explain</i>	GRI 102
MS3.5		Does your company cover sustainability issues in board meetings as part of the official agenda?	No	No			<i>Although not formally institutionalized, sustainability-related training sessions are included in the Board of Directors' meeting agenda on an as-needed basis</i>	GRI 102

MS4.1	Materiality assessment process	Does your company have materiality assessment and matrix, explaining how your company avoids, mitigates, or remediates negative impacts to the economy, environment, and society, and enhances positive ones?	Yes	Yes		Golomt Bank has collaborated with J.P. Morgan Development Finance Institute (JPM DF) to produce and publicly disclose the Development Impact Assessment. Further details are available in the 2025 Sustainable Development report. Going forward, we have committed to reporting the indicators included in the Development Impact Assessment annually. Link: https://golombank.com/wp-content/uploads/2024/08/GB_Development-Impact-Assessment_JPM_August-2024.pdf		GRI 102, SASB	
MS4.2	Organizational capacity	Annual average hours of sustainability training per employee (hr), by gender	Yes	Yes	Total numbers of employee	Number of employees trained in ESG (in multiples): 2024: 5,970 2025: 8,862	<i>If no explain</i>	GRI 102	
MS4.3	Monitoring	Is sustainability included the scope of the audit committee and internal control functions?	No	No		Further details are available in the 2024 Sustainable Development report. Link: https://www.golombank.com/wp-content/uploads/2025/09/SUSTAINABLE-DEVELOPMENT-REPORT-2024.pdf	<i>The UNEPFI PRB Progress report 2024 in the Sustainable Development Report 2024 have been verified by an internal audit division</i>	GRI 102	
MS5.1	Sustainability reporting	Does your company disclose a sustainability report (stand-alone or integrated into annual report) at least annually?	Yes	Yes		Starting in 2020, the Sustainability Report has been published annually. Link: https://golombank.com/about-bank/sustainable-development/report	<i>If no explain</i>	GRI 102	
MS5.2		Does the company prepare a TCFD-aligned climate disclosure?	No	No		In 2024, Golomt Bank undertook preparatory work with an international professional organization to ensure readiness for the implementation of IFRS S1 and S2, and developed a detailed implementation roadmap through 2027. In 2025, the Bank continues to implement enhancements to achieve compliance with IFRS S1 and S2 requirements. As of 31 December 2025, the overall implementation readiness stood at 90% for IFRS S1 and 91% for IFRS S2.	<i>If no explain</i>	GRI 102, SDG 13, TCFD	
MS5.3		Are the sustainability data assured by an independent third-party?	No	No		The 2022 and 2023 Principles for Responsible Banking Progress reports were verified by the EY audit firm. Link: https://www.golombank.com/en/about-bank/sustainable-development/report	<i>The UNEPFI PRB Progress report 2024 in the Sustainable Development Report 2024 have been verified by an internal audit division</i>	GRI 102, SDG 12	
MS6.1	Memberships	Number of sustainability associations, networks, and national or international advocacy organizations in which the company participates with a significant role.	Yes	Yes		Member organizations: 1. Mongolian Sustainable Finance Association 2. United Nations Environment Programme, Finance Initiative-Principles for Responsible Banking (UNEP-FI-PRB) 3. Partnership for Carbon Accounting Financials (PCAF) 4. IFC The Alliance for Green Commercial Banks 5. Joint Impact Model	<i>If no explain</i>	GRI 102, SDG 17	
E Environmental Indicators									
E1.1	Energy	Total energy consumption	Total direct energy consumption and cost spent	2023 baseline data: Offices: 1,066,481.32 kWh /4/ Improved data coverage: Offices: 1,066,481.32 kWh /4/ Branches: 608,631.45 kWh /32/	2023 baseline data: Offices: 953,961.46 kWh /4/ Improved data coverage: Offices: 1,129,010.82 kWh /7/ Branches: 804,658.25 kWh /42/	MWh	Information on consumption based on the 2023 baseline data and the improved data coverage can be presented together. In 2023, electricity consumption data included only office operations, while branch consumption was not captured. In 2024, the data coverage was expanded to include all offices and 32 branches. In 2025, it was further expanded to include all offices and 42 branches. Efforts are ongoing to further improve the completeness and accuracy of branch data collection going forward.	<i>If not available explain</i>	GRI 302, SDG 12
E1.2	Electricity	Total electricity consumption, cost spent, and reduction (year-to-year)	114,964	109,520	MWh	Total office electricity savings: 109,519.86 Projects and initiatives that have resulted in energy savings Link: https://golombank.com/wp-content/uploads/2025/01/%D0%A2%D0%9E%D0%93%D0%A2%D0%92%D0%9E%D0%A0%D0%A2%D0%9E%D0%99-%D0%9D%D0%9E%D0%93%D0%9E%D0%9E%D0%9D-%D0%A1%D0%90%D0%9D%D0%A5%D2%AE%D2%AE%D0%96%D0%98%D0%9B%D0%A2%D0%98%D0%99%D0%9D-%D0%A1%D0%90%D0%99%D0%9D-%D0%A2%D0%A3%D0%A0%D0%A8%D0%9B%D0%90%D0%93%D0%A3%D0%A3%D0%941.pdf	<i>If not available explain</i>	GRI 302, SDG 12	
E1.3	Heat	Total heat consumption, cost spent, and reduction (year-to-year)	2023 baseline data: Offices: 2,782.40 GJ /3/ Improved data coverage: Offices: 4,249.07 GJ /4/	2023 baseline data: Offices: 3,059.15 GJ /3/ Improved data coverage: Offices: 15,305.66 GJ /6/ Branches: 146,139.95 GJ /14/	BTU & %, MNT	Information on consumption based on the 2023 baseline methodology and the improved data coverage can be presented together. In 2023, electricity consumption data included only 3 office operations, while branch consumption was not captured. In 2024, electricity consumption data included only 4 office operations, while branch consumption was not captured. In 2025, it was further expanded to include 6 offices and 14 branches. Efforts are ongoing to further improve the completeness and accuracy of branch data collection going forward.	<i>If not available explain</i>	GRI 302, SDG 12	
E1.4	Fuel	Total fuel consumption (coal, oil, gas etc.), cost spent, and reduction (year-to-year)	35,394.52	89,647.44	litre/kg & % & GJ, MNT	Total fuel consumption purchased, including gasoline and diesel fuels.	<i>If not available explain</i>	GRI 302, SDG 12	
E1.5	Non-Renewable energy	Share of non-renewable energy consumption	99.73	99.26	%	Energy source type: coal	<i>If not available explain</i>	SFRD	
E1.6	Renewable energy	Share of renewable energy consumption	0.27	0.74	%	In 2025, a 30kW solar system, comprising 45 solar panels, was installed at the Amgalan warehouse and archive facility, which has a total usable area of 2,756m ² , thereby increasing the use of renewable energy.	<i>If not available explain</i>	GRI 302, SDG 7	

E2.1	GHG emissions	Emissions	Total Scope 1 and 2 emissions	1,876,856.55	237,988.32	tCO2e	For Scope 1, 2, 3 (others), greenhouse gas emissions were calculated using the following criteria: the GHG Protocol standards and the Energy Regulatory Commission's "Methodology for Measuring, Reporting and Verifying Greenhouse Gas Emissions from the Energy Sector" and recommendations from the Intergovernmental Panel on Climate Change (IPCC). Scope 3 financed greenhouse gases will be additionally disclosed as of June 30, 2026.	If not available, explain	GRI 305, SDG 13, WRI/WBCSD GHG protocol.
E2.2		Emissions reduction	Reduction of total Scope 1 + 2 GHG emissions (year-to-year)			tCO2e		If not available, explain	GRI 305, SDG 13, WRI/WBCSD GHG protocol.
E2.3		Carbon offsetting	Total carbon offset	1,770.00	2,020.48	tCO2e	In support of the national Billion Tree movement, a total of 440,432.16 trees were planted, absorbing 2,020.48 tons of CO2. In addition, Golomt Forest has planted more than 200 spruce trees in its 6th year, bringing the total number of trees to 1,256.	If not available, explain	GRI 305, SDG 13, WRI/WBCSD GHG protocol.
E3.1	Climate change	Climate policy	Does your company have a stand-alone/integrated climate change policy?	Yes	Yes		Sustainable development policies address how to manage climate risks. For more information, see the Climate Change Risk Management section of the 2025 Sustainable Development Report.	If not available, explain	GRI 201, TCFD, SDG 13
E3.2		Climate risk and opportunity assessment	Did your company conduct a climate risk and opportunity assessment (scenario analysis, stress test etc.)?	Yes	Yes		We are undertaking scenario analysis to assess how climate change risks may impact strategic, financial, and non-financial decision-making. In 2024, Golomt Bank conducted a preliminary scenario analysis in line with the Bank of Mongolia's guidance, applying NGFS scenarios, and submitted the results to the Bank of Mongolia. Further details on the methodology and findings of the 2025 analysis are available in the Climate Change section of the 2025 Sustainable Development report.	If not available, explain	GRI 201, TCFD, SDG 13
E3.3		Economic loss	Total amount of economic loss faced due to climate related disasters and events			MNT	In 2025, the Bank continued to integrate physical and transition risks, as well as broader climate-related risks, into its overall risk management framework, while further enhancing the quantification. For more detailed information, please refer to the Climate Risk section of the 2025 Sustainable Development Report.	If not available, explain	GRI 201, TCFD, SDG 13
E3.4		Climate investment	Total amount invested, annually, in climate-related infrastructure, resilience, and product development			MNT	Please visit the following link to access the Sustainable, green loan best practices booklet: https://golombank.com/wp-content/uploads/2025/01/%D0%A2%D0%9E%D0%93%D0%A2%D0%92%D0%9E%D0%A0%D0%A2%D0%9E%D0%99-%D0%9D%D0%9E%D0%93%D0%9E%D0%9D-%D0%A1%D0%90%D0%9D%D0%A5%D2%AE%D0%96%D0%98%D0%9B%D0%A2%D0%98%D0%99%D0%A1%D0%90%D0%99%D0%9D-%D0%A2%D0%A3%D0%A0%D0%A8%D0%9B%D0%90%D0%93%D0%A3%D0%A3%D0%941.pdf	If not available, explain	GRI 201, TCFD, SDG 13
E3.5		Prevention/adaptation to climate change	Does your company have activities/steps to prevent and (if not preventable) adapt to the impact of climate change?	Yes	Yes		An Environmental, Social, and Governance (ESG) materiality assessment was conducted to identify high-impact issues. For detailed information on each indicator, please refer to the 2025 Sustainability Development report for Environmental and Social risk management, and to the Annual report for Governance-related disclosures.	If not available, explain	GRI, SASB, World Economic Forum
E4.1	Water	Water used	Total amount of water withdrawn/used	Offices: 6,934 Branches: 1,562 Total: 8,496	Offices: 10,783.61 Branches: 7,648.87 Total: 18,432.48	m ³ /L	In 2024, water consumption was recorded for 4 offices, whereas in 2025, this increased to 7 offices, which is primary reason for the higher reported office consumption. Similarly, branch-level data coverage improved from 9 branches in 2024 to 23 branches in 2025, reflecting more comprehensive and accurate recording of actual consumption.	If not available, explain	GRI 303, SDG 6
E4.2		Water saved	Total amount of water saved due to conservation and efficiency improvements	647	0	m ³ /L	The 1.8-fold increase in total water consumption is attributable to improved tracking and more accurate recording of actual usage across offices and branches. Since the previous year, the Bank has been implementing a bank-level water consumption data, with a continued focus on ensuring data completeness and quality.	If not available, explain	GRI 303, SDG 6
E4.3		Water reuse	Percentage of water recycled and reused			%		If not available, explain	GRI 303, SDG 6
E4.4		Water discharged	Total water discharged			m ³ /L		If not available, explain	GRI 303, SDG 6
E5.1	Waste (solid waste)	Waste discharged	Total amount of waste discharged	1,916.68	1360.36	tons	The total amount of non-recyclable waste sent to landfills is estimated based on the average amount of waste generated per employee per day.	If not available, explain	GRI 306, SDG 12
E5.2		Waste recycled	Waste recycling percentage	1,567	1,113	tons	In collaboration with our recycling partners, we expanded our collection of cardboard, plastic, cans, and glass from 3 offices in 2024 to a total of 8 offices and branches. We are committed to increasing the proportion of waste recycled each year and have set a target to increase recycled each year and have set a target to increase recyclable waste volumes by 30% by 2030.	If not available, explain	GRI 306, SDG 12
E5.3		Hazardous waste	Total amount of hazardous waste (including e-waste) discharged			tons	A total of 4,524 batteries and printer cartridges were purchased during the reporting year.	Since there is no recycling center for batteries, the collected batteries are stored in a warehouse	GRI 306, SDG 12
E6.1	Biodiversity	Landscape planning, design greenery	Share of sustainably managed public space, or green space created as of total area			%	Golomt Bank has established the "Golomt Grove" at the national Amusement Park and, in its sixth year, planted an additional 226 spruce trees, increasing the total to 1,256 trees.	If not available, explain	GRI 304, SDG 15
E6.2		Wild plants and animals	Number of species conserved			no.		If not available, explain	GRI 304, SDG 15
E6.3		Activities negatively affecting biodiversity-sensitivity	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity or cultural value			%		If not available, explain	SFRD, IFC Performance Standard 6
S	Social Indicators								
S1.1	Human capital development	Employee turnover	Year-over-year change of full-time employees			%		If not available, explain	GRI 401, SDG 8
S1.2		Jobs created	Increase in the total number of full time employees compared to the same period of the previous year	880	862	no.		If not available, explain	GRI 401, SDG 8
S1.3		Training	Annual average hours of training per employee	6	9	day		If not available, explain	GRI 401, SDG 8

FS1	Financial services	Access to finance	Annual number of participants in financial literacy and inclusion initiatives			no.	Please refer to the Financial inclusion section on page 49 of the 2025 Sustainable Development report for more details.	If not available, explain	SDG 1
FS2		E&S risk management	Percentage of transactions assessed by ESG risk criteria and Exclusion lists	2,321.00	1,646.00	%	In 2025, a total of 1,646 environmental and social risk assessments were conducted. Out of the total assessments, 71% were from non-risky sectors with an 67% disbursement rate. The remaining 29% were identified as operating in risky sectors with 54% of these resulting in loan disbursement.	If not available, explain	Mongolian Sustainable Finance Principles
FS3		Sustainable issuance	Share of green/sustainable loans in compliance with Mongolia green/SDG taxonomy as of total loan portfolio	3.6	4.9	%	The bank is working towards a target of 10% of its total loan portfolio to be sustainable and green loans by 2030. To achieve this target, the bank is offering the following 7 types of sustainable and green loan products to the market. Link: https://golombank.com/retail/loans	If not available, explain	SDG 13, Mongolia Green Taxonomy
A1	Agriculture & food production	Pesticide use	Does your company have a policy/procedures?	Select	Select		Add link Note: Policy/procedure for safe storage, handlings & usage of pesticides, and control of persistence on food product and soils, and control of contamination on surface & groundwater.	If not available, explain	GRI 403, SDG 12
A2		Sustainable land	Percentage of pasture and grazing land managed to MNS 6891:2020, "Responsible Nomad"			%		If not available, explain	SDG 12
A3		Products recalled	Percentage of products recalled due to food quality and/or safety issues			%		If not available, explain	GRI 416, SDG 12
T1	Textile	Sustainable livestock	Number of livestock and percentage of pasture managed to MNS 6891:2020, "Responsible Nomad"			no. & %		If not available, explain	GRI 403, SDG 12
T2		Sustainable products	Number of products produced according to MNS 6926:2021 "Sustainable Textile Production"			%		If not available, explain	GRI 416, SDG 12
T3		Chemicals handling	Does your company have a Policy/procedures to manage sensitive chemicals and materials?	Select	Select		Add link and date Note: Policy/procedure for safe storage, handlings & usage of sensitive chemicals and materials, treatment of contaminated water, and control of contamination fo surface and groundwater.	If not available, explain	GRI 403, SDG 12
MA1	Manufacturing	Chemicals handling	Does your company have a Policy/procedures to manage sensitive chemicals and materials?	Select	Select		Add link and date Note: Policy/procedure for safe storage, handlings & usage of sensitive chemicals and materials, treatment of contaminated water, and control of contamination fo surface and groundwater.	If not available, explain	GRI 403, SDG 12
MA2		Recycled materials	Percentage of materials used that are recycled input materials			%		If not available, explain	SDG 12
MA3		Green labeling	Percentage of products that acquired eco/green labeling/certification			%		If not available, explain	GRI 417, SDG 12
M11	Mining	Rehabilitation	Total area of land rehabilitated or restored as percentage of total operational land			%		If not available, explain	SDG 15
M12		Fines	Number of incidents of non-compliance with environmental permits, standards, and regulations			no.		If not available, explain	GRI 307, SDG 15
M13		Resettlement	Number of people affected by economic displacement and resettlement			no.		If not available, explain	GRI 203, SDG 1
CO1	Construction	Green building labels/certificates	Percentage of building projects that acquired any green building labels/certificates			%	Please describe the projects that received the certification	If not available, explain	GRI 417, SDG 12
CO2		Accessibility	Percentage of building projects that comply with accessibility laws and regulations in Mongolia, including accessibility consideration for people with disabilities			%	Briefly describe the measures that are applied	If not available, explain	SDG 10
CO3		Green area and community space	Percentage of building projects comply with green area and community space laws and regulations in Mongolia			%	Briefly describe the measures that are applied	If not available, explain	GRI 304, SDG 15