BACB



Sustainability Report of Bulgarian-American Credit Bank AD

2021-2022

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About the report

This report is the first document in which BACB presents transparently and fully the impacts that the Bank has on the e n v i r o n m e n t, society and corporate governance issues. The report covers the financial years 2021 and 2022 and aims to inform our stakeholders, and especially BACB's customers and partners, about how we manage and what commitments we make on sustainability-related issues.

The content of the report has been prepared following the ^{GRI1} guidelines and the assessment of materiality follows the CSRD principle of dual materiality.

We welcome any comments, suggestions or questions you may have regarding our report and results. Please send an email to: ESG@bacb.bg



1. GRI (Global Reporting Initiative) is an independent international organisation that helps businesses and other organisations take responsibility for their e n v i r o n m e n t a l, social and economic impacts.

Address by the Chairman of the Supervisory Board of BACB AD



Dear shareholders, partners, customers and colleagues,

In the last two years, ri- chs that previously seemed to be unlikely or rather hypothetical have materialised. The measures taken to limit the negative effects of the spread of the Kovid epidemic and the war in Ukraine have led to significant economic difficulties and many challenges for the global community. During this difficult period for both businesses and households, the Bank continued to work proactively to fulfill its core responsibilities - to create opportunities for growth and to support its customers and employees.

We have succeeded thanks to the actions and investments we have consistently made over the years to build a strong and sustainable company. We have built a system for effective risk management, adequate financial and operational controls. We put a strong focus on customer needs, digitalization and process automation. We supported green initiatives and created green, digital products that save natural resources. We maintain a high corporate culture that reinforces integrity and fairness, accountability and transparency to stakeholders.

Our commitment to environmental protection, climate change mitigation, social and corporate responsibility play a decisive role in our decisionmaking. BACB is a pioneer in financing the green economy, not only alternative energy sources, but also sustainable urban environments, green taxis, green transition projects, organic production and organic agriculture. In recent years, BACB has been awarded the greenest bank in the country five times for its green projects, products and overall strategy.

Our goals are to maintain high standards for our customers, to provide timely and appropriate solutions for our business and consumers, while delivering benefits and value to them, our shareholders and our stakeholders.

We believe that we must continue in this direction. The Bank, our employees, partners and customers, all together, can contribute with our responsible attitude towards nature, society and the development of an ecological and competitive economy in Bulgaria.

On behalf of the management of BACB, thank you for your support!

We wish you a pleasant reading of our first "Sustainable Development Report".

Sincerely,

Tsvetelina Borislavova Chairman of the Supervisory Board

About us

The Bulgarian-American Credit Bank was established in 1995 to support the development of the private sector in Bulgaria. Initially, the Bank lent to small and mediumsized enterprises and offered a limited range of banking services. Gradually, it developed its portfolio of services and in 2012 obtained a full licence to provide all banking services provided for in the Credit Institutions Act. To date, the Bank's priority areas of innovative financing technologies are and environmentally friendly energy and agriculture sectors.

The branch network in Bulgaria covers 11 cities, in which 6 business centres and 20 offices are located. In addition to physical offices, the Bank has a modern alternative - multifunctional e-banking.

The Bank's customer base is represented by individuals, companies and institutions.

The products we offer to corporate clients are working capital and investment loans, many of which are supported by European programmes and guarantee funds, as well as those in partnership with other financial institutions. BACB's corporate clients benefit from the terms and conditions for housing and consumer loans and deposit account management.



Our values

The core values we share with our team, partners and clients are transparency, integrity and professionalism.



Professionalism

We are close to our customers with timely solutions, individual approach, quality, speed and security of services.



Integrity

Our responsibility is long-term stability and providing benefits to customers and benefits to shareholders.



Transparency

We provide clear terms for our customers and partners, building long-term partnerships based on trust, security and quality of operations.

Our approach to sustainable management



Sustainable management has always been a part of BACB's strategy - from the Bank's inception to today. In the beginning, this meant mostly good corporate governance, which creates clear and pro- grammatic rules, resilience in the face of adverse factors, creation of new opportunities and long-term growth. The proof of our success is our continued development and the trust we have gained through the increasing number of customers over the years.

In a changing urbanised world, coupled with a progressive reduction in the main sources of energy, pollution and environmental degradation, there is a need to change existing sustainable management and development policies, linked to a new attitude towards the environment.

At European and international level, the debate on environmental investment, social relations and responsible governance is intensifying. There is a need for a higher level of environmental gical and social standards that lead to measurable improvements related to climate change and any other negative impacts on the environment and society.

In this sense, for us, sustainable management has two dimensions. The first is the internal one. It relates to the measurement, control and management of the impacts resulting from the direct activities of the Bank and its employees.

The second aspect, the external one, is related to the special role we have as a financial institution. And that is to be a key partner in the development of a resource-efficient, competitive and green economy in Bulgaria. BACB strives to achieve synergies between the needs of our customers, our responsible attitude towards the environment and our own business goals.

All of this requires adapting our business strategy and reflecting all relevant ESG aspects in it.

Our role in supporting a sustainable economy

The main and most active partner of the Bank is the Bulgarian business. It seeks and applies the latest approaches and innovations in order to improve its market and social positioning, as well as to optimize costs. This is also where the Bank's role in sustainable development comes in, through the provision of finance to businesses and households. That is why we are developing banking products and financial services for companies that bring the necessary evolutionary change.

The main area of BACB's lending is related to the competitiveness of production in the country. The Bank stimulates environmentally friendly projects by providing loans for alternative agriculture, renewable energy sources, sustainable urban environment projects, etc.

The Bank's management policy is aimed at integrating society's social commitment to the global problems of the planet - environmental protection, climate change, the reduction of finite energy resources, the growth of waste, the increase in carbon dioxide emissions and other environmental issues.

BACB's **mission** is to provide innovative financial solutions based on sustainable finance priorities - green and social banking, to support projects with proven management practices aimed at achieving sustainable development goals.

Vision

The Bank sees its role as one of the drivers of changing economic models and development policies, and of a more substantive integration of the green idea into them. Our mission and vision fit with the way we want to position ourselves among our customers and in the banking community. In order to maintain this image, our long-term focus is on sustainable finance, which involves securing growth and economic progress for society.

In addition to being a green bank, we will continue to work to be recognized as a fair, efficient and responsive partner.

Business strategy

This business strategy covers the period 2021 - 2023. It was created in the context of the Co- kind crisis in 2020 and was influenced by the economic situation at that time. It focuses on:

- Establishing BACB as a trusted partner of its clients
- Responsible provision of financial services that enable growth and economic progress
- Quality assurance of services and internal processes
- Ensuring a stable base and buffers for the more severe economic effects of the Kovid crisis and other emergencies
- Adaptation to changes in the market and regulatory environment
- Improving competitive positions

At the end of 2023, we will prepare our new business strategy, in which we will integrate the calls for sustainable development.

ESG and our team

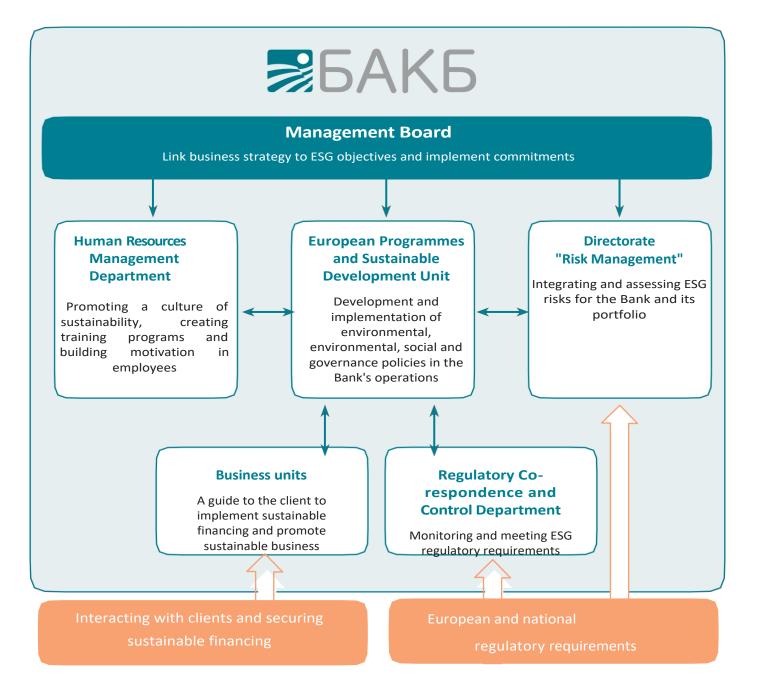
The BACB team comprises more than 350 employees working in a functional organizational structure.

Achieving the goals of sustainable growth and securing sustainable financing is a complex responsibility of the entire bank and is associated with every role in our organisation. Building ESG competencies and promoting a culture of sustainability is therefore a priority that

it will be shared with our colleagues from the highest to the lowest hierarchical level.

Achieving ESG objectives goes beyond internal governance. Our teams work "outside-in" through direct interaction of our employees with customers, sharing policies, regulatory requirements, new products with a focus on sustainability. On the other hand, ESG is entering

"from the outside-in" in our organisation by monitoring European and national regulatory requirements and putting them into practice in the Bank.



Interested parties

The long-term success of BACB depends on the creation and development of lasting and stable relationships with our partners, clients and other stakeholder groups with whom we share common goals and values.



Memberships





We are members of the Confederation of Employers and Industrialists in Bulgaria, where we share common goals for effectiveness in improving the business climate in the country, sharing good business practices and increasing the competitiveness of the Bulgarian economy. We are part of the Association of Banks in Bulgaria, where we interact and partner with other banks on issues related to draft regulations, raising the professional quali- fication and in- formation of bank employees and other activities in the scope of banking.

Process for identifying relevant topics

In this Sustainability Report, we focus on topics that affect our business and our stakeholders. In order to highlight the most significant of these, we conducted a process to assess the significance of the themes at the beginning of 2023. In the assessment, we applied the principle of dual materiality that the Corporate Sustainability Reporting Directive2 (CSRD) will require of reporting entities in the upcoming reporting periods. The principle is based on a twopronged assessment - the extent of impacts of the company's operations on sustainability and the extent of financial impacts on the company as a result of managing sustainability topics. Although the Bank does not yet have a regulatory commitment to apply it, this assessment approach has been accepted and endorsed by Management as it provides the following benefits:

Improved risk management: by considering both financial and non-financial impacts, companies can better identify and manage risks that could affect their long-term success.

- Creating long-term value: Incorporating dual materiality into the Bank's decision-making can help ensure that it creates long-term value for both shareholders and society. Managing nonfinancial impacts, such as environmental and social risks, creates a more sustainable and robust business model.
- Ensure more comprehensive and transparent reporting to stakeholders. This helps to build trust and accountability and to improve the Bank's reputation.

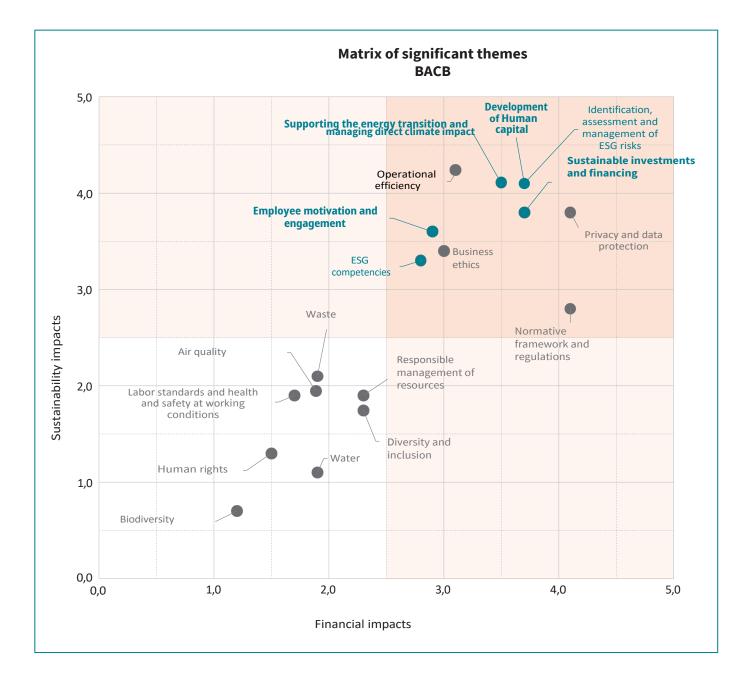
The assessment of the significant themes was carried out in three stages. The first stage started with the identification of those themes that reflect current ESG aspects for the banking industry and the specification of those themes that are directly related to the environment in which BACB operates. This includes the specificities of the Bulgarian market, the Bank's development priorities and the services it offers, as well as the relevant topics for all stakeholder groups. This step helped us to define the scope of the topics, reaching a common understanding for both Management and stakeholders.

2. The new reporting rules under the Corporate Sustainability Reporting Directive will come into effect from 2024 and the obligation for BACB to meet the approved standards will occur when the Bank meets the criteria that define the reporting obligation.

Next, we internally assessed the relevance of the themes with the Bank's management by applying the principle of dual co-responsibility. In the assessment related to sustainability impacts, we used the following criteria: impact scale, scope, remediation feasibility and likelihood of impact. We assessed financial impacts by considering the potential magnitude of the financial effects and the likelihood of the impact occurring. In the third and final stage, we also carried out an external assessment by conducting an electronic survey of stakeholders for

Bank countries. These include representatives of the Bank's partners, business and individual customers, as well as the Bank's own employees.

The results of the evaluation of the significant themes is visualized in a materiality matrix (Fig- ure 1). The matrix shows how the aspects were assessed along two axes: in terms of sustainability impacts and financial impacts on the company. The bolded themes in the matrix reflect the high importance rating by BACB stakeholders.



The significant themes of BACB

Торіс	Scope of the topic
Supporting the energy transition and managing direct climate impacts	Measures to reduce the carbon footprint of the Bank's direct operations and adapt to climate change. Promote sustainability through renewable energy alternatives for own-use and implementation of decarbonisation project appraisal processes.
Water	Reduce water consumption and monitor wastewater.
Air quality	Limiting activities that threaten air quality.
Waste	Reducing the amount of waste in the Bank's daily operations. Waste lifecycle management.
Biodiversity	Measures for the conservation of ecosystem diversity, species in ecosystems and genetic diversity
Responsible management of resources	Apply sustainability criteria to supplier selection.
Diversity and inclusion	The right of every employee to a supportive and prejudice-free working environment regardless of gender, nationality, religion, ethnic origin, age, ideology, disability, sexual orientation and identity. Inclusion, equality, a culture of open dialogue and equal opportunities promote diversity among employees.
Employee motivation and engagement	Employee wellbeing involves maintaining and improving the levels of physical and mental health of employees. Beyond physical and mental health issues, employee well-being extends to happiness and j o b satisfaction. Comparison against the market (in the sector).
Human capital development	Attracting and retaining high calibre employees. Investment in employee development and training leads to higher productivity, quality and employee satisfaction at all levels.
Labour standards and health and safety at work	Ensuring responsible and fair working conditions. The right of everyone to a safe workplace and to protect the health of employees, ensuring the fundamental right to physical integrity.
Human Rights	Integrate international human rights standards into internal policies, procedures, rules, corporate reporting, benchmarks and other ESG data.
Sustainable financing	Sustainable finance encompasses financial activities that support economic growth while reducing negative and increasing positive impacts on environmental, social and governance factors.

Sustainable funding

At the heart of the term "sustainable finance" is the idea of long-term investing that is socially responsible and does not harm the environment. The aim is to combine good economic performance with positive impact by investing in projects and organisations that contribute to the sustainable development of a sector. The context in which business is developed is transformed by various environmental, social and governance (ESG) aspects such as climate change, human rights, business ethics, as well as by continuously evolving trends such as biodiversity loss, unsustainable use of natural resources, demographic changes, social and economic inequalities and pandemics. Therefore, for BACB, the integration of environmental, social and corporate governance (ESG) into the business model is fundamental.

	20	21	2022	
Our contribution to sustainable finance	BGN thousand	% of net exposure	BGN thousand	% of net exposure
Supporting small and medium-sized businesses in the country and promoting productivity and competitiveness	38 038	3,02%	37 561	2,70%
Low-cost buses and an improved e-ticketing system for Sofia's transport system	34 344	2,73%	28 615	2,06%
Photovoltaic renewable energy projects for small and medium-sized businesses	51 183	4,07%	45 767	3,29%
Shared urban mobility using all-electric vehicles	3 837	0,31%	3 063	0,22%
Loan scheme for financing undergraduate and postgraduate students	1 529	0,12%	1 991	0,14%
Total	128 931	10,25%	116 997	8,42%

- In the period 2021-2022, BACB is partnering with other financial institutions to create sustainable economic growth, support small and medium-sized businesses in the country and promote their productivity and competitiveness. Together with the Development Bank, the Financial Bulgarian Instruments Manager Fund in Bulgaria, the National Guarantee Fund and the Municipal Guarantee Fund for Small and Medium Enterprises of the Sofia Municipality, we have provided a toolkit to support small and medium-sized businesses in Bulgaria. The main sectors we supported with a total of over BGN 37 million over the two years were agriculture and livestock, food industry, construction and r e t a i l.
- We funded a project of Sofia Municipality for an ecologically sustainable transport system in Sofia and improved travel conditions. Result-

This project has resulted in the purchase of 60 lowemission buses, or almost 10% of Sofia Municipality's bus fleet. We have supported the construction of a modern electronic ticketing and fare collection system for passengers of the Sofia public transport, which facilitates the passengers' purchase of tickets, improves the quality and efficiency of the service, and reduces the use of paper.

We have secured funding for a number of renewable energy projects from photovoltaic (PV) plants for small and medium-sized businesses, which have had a positive impact on the energy transition and carbon footprint reduction. We also supported a shared urban mobility project in which the vehicles are electric. We have also implemented projects of social importance in partnership with the Ministry of Education and Science, providing a loan scheme for the financing of undergraduate and post-graduate students.

The development of sustainable societies requires a massive increase in capital investment in sectors and industries with the potential for positive environmental and social impacts in the coming decades. As a financial institution, BACB plays a vital role in ensuring this transformation. The main approach to impact is to change the way the Bank manages the capital entrusted to it.

The challenges that we see for the implementation of this transformation in relation to the environment in which we work are the following:

- Insufficient knowledge of ESG related topics management among businesses
- the risk of reducing the potential and opportunities for development by introducing high and difficult to achieve environmental criteria for small and medium-size businesses and, consequently, a lack of balance between achieving environmental and social impact
- Evolving ESG regulations that are complex and require significant resources for development and implementation by clients

shown that limiting funds as a form of punishment for high-emission short-term sectors can cause management effects and consequently increase pollution. We do not believe in the effect of extreme measures and do not seek immediate results. The goals we set ourselves in terms of developing sustainable finance cover a short period but are focused on achieving more. On the one hand, this will enable us to improve our current level and the sustainable finance products we offer. On the other hand, we will use the time to monitor and analyse trends, best practices and opportunities to support and those who have an impact on the economy.

and the well-being of society, but have difficulties in managing their direct impacts on the environment.

The main objective we have for the period 2023-2027 is to increase support for projects that tackle climate change, protect the environment and support social sustainability. To this end, we will develop and offer sustainable financing pro- ducts to be offered to our customers. These are green loans and those that are linked to meeting clearly defined sustainability criteria. Of interest to the Bank is the possibility of financing new technologies such as green hydrogen production, carbon capture and storage and other innovations that support the energy transition.

The EU Taxonomy and the Sustainability-Linked Loan Principles are the main frameworks we will use to define the terms of our sustainable finance products.

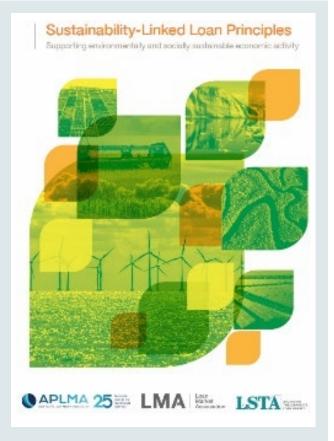


The EU taxonomy is designed to provide more transparent and stable financial markets, underpinning the green transition and directing capital flows towards environmentally sustainable activities. Reporting compliance with the Taxonomy, and in particular our clients' compliance with the technical criteria, will ensure better financing conditions for our borrowers' businesses.

In 2023, the European Commission added to the list of economic activities and related technical criteria for demonstrating sustainability under the EU Taxonomy. In doing so, it regulates which activities are to be considered environmentally sustainable and support the six objectives relating to environmental protection and conservation.

3. A study conducted by the Yale School of Management and the School of Management at Boston College in relation to sustainable finance. For more information, read here

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Another instrument that supports the development of bank lending to support environmentally and socially sustainable projects and activities is the Sustainability Linked Loan Principles. The Principles were developed by an experienced working group consisting of representatives of leading international financial institutions. The document aims to promote the development of preferential terms for loans linked to sustainability objectives. Application of the principles is voluntary.

BACB's European Programmes and Sustainable Development Unit works to create policies that encourage green investments in projects and activities that are consistent with available and evolving sustainable finance frameworks. In conjunction with external con- sultants, tools are being developed to improve the quality of information collected from clients and to provide guidance to clients to improve their own sustainability performance. This will facilitate verification of eligibility and compliance under the Taxonomy and enable BACB to respond to the needs and expectations of stakeholders with the ambition to contribute to sustainability and drive the necessary internal and external transition.

Legislation and regulations

Banking is a sector with many risks, the management of which is regulated by a wide range of rules and detailed regulations. The highly regulated environment in which we operate defines regulatory compliance as a core part of our business and is critical to maintaining trust and protecting the interests of our stakeholders.

Therefore, building and maintaining a strong culture of legal compliance is a core value for the BACB team. All of our employees should understand and carry out their roles and responsibilities in a manner that ensures compliance with applicable laws, rules and regulations. This is accomplished by setting a clear tone from management, encouraging individual accountability and awareness of potential risks through appropriate policies, training, support for open communication and behavioral standards.

A separate Regulatory Compliance and Control Department has been established in the Bank to support activities related to the regulatory compliance and control function. The organisation of the regulatory compliance function is aligned with the Bank's strategy and risk management structure. In this way, BACB plc is able to effectively manage the risk of non-compliance by adhering to regulatory compliance principles. The main duties of the Regulatory Compliance and Control Department are related to monitoring and controlling the activities and measures taken to minimise the risks of regulatory non-compliance, as well as reflecting the changes arising from the applicable local and European legislation regarding the activities of credit institutions in the internal banking policies, rules and procedures. The Regulatory Compliance and Control Department regularly reports the risks of regulatory non-compliance to the Bank's Board of Directors and Audit Committee.

In 2021 and 2022, the Bank continued to monitor regulatory changes in financial and non-financial reporting. The content of the reports and reports in this regard is modified accordingly with the changes in the legislative framework.



In 2022, a process to prepare for the implementation of ESG standards in the Bank and for the first reporting under the Portfolio Eligibility Taxonomy was launched.

There is a separate unit in the Bank - Department "European Programmes and Sustainable Development, which is responsible for ESG reporting and compliance with sustainable development rules.

With regard to annual reporting (financial and nonfinancial), the Bank complies with the statutory disclosure deadlines and content requirements for reports and statements. In 2021 and 2022, no delays or gaps in the content of disclosures were identified.

In the long term, compliance with laws and regulations remains a priority at every level of the B a n k . Our annual target is zero confirmed alerts and zero fines for non-compliance.

What lies ahead is to build internal capacity and understanding of ESG docking requirements and ESGrelated regulatory changes. Therefore, we will provide the necessary resources to build the "new knowledge" - time, training materials, participation in workshops. The already established ESG team will support all other functions and will monitor changes and new regulations in the field of ESG.

At both European and national level, ESG reporting requirements are an area in development. European and global regulations in the area of sustainable finance are to be phased in. A key focus and commitment for the Sustainable Development team is to monitor developments in these areas and support the process of expanding the content of reports, tracking the implementation of ESG targets, their timely disclosure and applying best standards in the design of sustainable finance products.

Business ethics

For us, business ethics is about maintaining professional relationships and making decisions that support shared human values.

As a lending institution, we observe all applicable laws and regulations, but we also apply strict rules to our team regarding ethical conduct, openness and transparency, discretion and confidentiality in our work. Our rules for the interaction of our employees with clients and stakeholders are described in the BACB Code of Ethics.

For the purpose of prevention of conflicts of interest and disclosure of fiduciary responsibility, BACB has adopted and operates Internal Rules for Prevention of Conflicts of Interest and Ensuring Fiduciary Responsibility. They comply with the requirements of the Credit Institutions Act and the applicable guidelines in this area of the European Banking Authority.

In 2021 and 2022, reviews and revisions of the Rules were carried out, introducing additional requirements for administrators and responsible units in BACB regarding conflicts of i n t e r e s t . This includes conducting ongoing reviews and timely updating of information for the administrators - members of the Supervisory Board, the Management Board and the advisory bodies to the Supervisory Board to ensure a fair and objective process in decision-making and management of the business.

In order to provide more transparency and accessibility to our stakeholders to the ethical standards that are followed at BACB, we plan to update and publish the Code of Ethics on our corporate website in 2024. In the same year, we will update and improve our whistleblowing process, which re-provides an anonymous reporting option.

Identification, assessment and management of ESG risks

Banking is exposed to a number of typical industry risks, including credit risk, interest rate and exchange rate movements, liquidity risk, operational risk and other non-financial risks.

Risk management refers to a coordinated set of activities to proactively identify and manage the multiple risks that may affect the Bank and its ability to better achieve its objectives and implement its strategy.

The main internal document by which the Bank manages these activities is the Risk Management Policy, which defines the model and framework for risk management in the Bank, the functions of the relevant actors in the process. Risk management is carried out in three lines of defence - the business units are the front line, the Directorate

"Risk Management and Regulatory Compliance and Control as a second line of defence, and the Specialised Internal Audit Service as a third line of defence. These lines are involved in the various activities that are part of the Risk Management process:

Risk identification

Risk identification is the process of systematically and proactively identifying, recognising, assessing and describing risks, both inside and outside BACB, that could have a negative impact on the Bank's strategic objectives today and in the future.

In addition to the possible sources of risk, the process also identifies potential consequences and materiality for BACB.

Risk measurement/assessment

Risk measurement aims to quantify the different risks to which we are exposed. Once the risks have been identified, individual elements can be assessed on a scale of impact, likelihood of occurrence, amount of exposure and effect on the Bank's equity and financial performance using risk-related measures.

Determination of risk appetite4

The bank defines its risk appetite by setting limits for the different types of risk to which it is exposed. The limits are monitored and evaluated on an ongoing basis to check whether they are being met and whether there is a need for changes in either direction.

Defining risk appetite helps us to better understand and manage risks by describing them in concrete terms - both qualitatively and quantitatively. The outcome of the process and this assessment is the decision on how much and what kind of risk we want to take in relation to a specific banking transaction or service.

Risk analysis, reporting and follow-up Risk analysis and reporting are designed to provide the Board, the Supervisory Board and the regulator with transparency about the risk that the Bank is taking, ensuring a holistic, forward-looking and ex-post view of the changing risk profile of the Bank's portfolio and the context in which BACB operates.

In addition to internal reporting, external reports are produced for the various stakeholders.

Stress testing

Stress testing is conducted for each material risk to the Bank. The Bank has a stress testing programme that summarises the types of stress tests, their frequency and key assumptions.

4. Risk appetite - the risk the Bank is willing to take to be in line with its strategic and operational objectives.

Stress testing is a process that supports pro- cess decision-making. This includes various techniques used to assess the potential negative impact on BACB's financial position caused by specific events and/or movements in risk factors ranging from plausible to extreme or even extreme.

Detailed information on all these processes can be found in the BACB Annual Reports for 2021 and 2022.

link to the annual reports

Integrating ESG risks into the risk management process for the Bank

For banks, resilience is primarily an economic issue, and this calls for the assessment of a new type of risk -ESG risk. We therefore need to approach ESG risks in the same way as we assess any other type of banking risk. We need to integrate ESG risks into our risk management framework.

To this end, we plan to create tools to identify, assess and manage ESG risks and incorporate them into the risk assessment methodology for the Bank by 2027. As a result, we will next use the newly created tools to monitor material ESG risks associated with the development of sustainable finance products.

The European Banking Authority is advancing ESG reporting and disclosure requirements by publishing technical standards on Pillar ³⁵ disclosures that define the format and scope of data and offer comparable disclosures to show how climate change may exacerbate other risks on institutions' balance sheets and how institutions mitigate those risks.

In this regard, the Bank plans to continue to monitor changes in regulatory requirements, to expand the set of data it collects and to comment on best practices. The aim is to meet reporting requirements in a timely manner and to expand techniques for assessing the impact of ESG risks on financial performance and capital position.

5. The Basel Committee on Banking Supervision has developed an internationally agreed set of measures that aims to strengthen the regulation, supervision and risk management of the banking sector, known as Basel III. It consists of three main pillars: minimum capital requirements (Pillar 1), supervisory review (Pillar 2) and market discipline (Pillar 3). Pillar 3 of the Basel framework aims to promote market discipline through disclosure requirements for banks. This means that banks must regularly publicly disclose certain qualitative and quantitative information either as part of their financial statements or in separate Pillar 3 reports.

Privacy and data protection

We handle large amounts of personal and financial information that we receive on a daily basis. The high level of confidentiality and data protection that customers, employees and partners provide us is our responsibility in this process. The collection and processing of data is carried out in full compliance with current legislation. We ensure the security of information and the credibility of our services, implementing internal organisational and technical measures. We have transformed our internal processes order to ensure permanent security when in implementing new technologies. We protect sensitive information and take measures to secure and prevent attacks by cyber criminals, including phishing and malware attempts.

Duties in relation to the organisation and con- trol of personal data protection are assigned to the Personal Data Protection Officer, the Personal Data Protection Committee and the heads of the Bank's structural units and offices. The internal rules governing the individual business processes detail the rights, duties and responsibilities of the employees involved in data protection activities. All data protection rules comply with European and local legislation in this area.

The Data Protection Officer shall annually assess the technical and organisational measures in the Bank and the state of the control environment and activities in the area of personal data protection. The results shall be reported to the Management Board.

Annually, we organise an audit of the identified processes in order to obtain an external evaluation of the implemented measures. We take into account the recommendations resulting from the external audits and make the necessary changes and improvements.

For the reporting period, we have no confirmed data leaks or breaches of confidentiality and data protection.

In the long term, BACB's goal is to continue to maintain a high level of data protection in line with regulatory requirements and to ensure zero confirmed data breaches.

In order to improve the technical security of the information, we plan to develop and use specialized s of t w a r e in 2024. The application will help us optimize customer data with the introduction of an electronic customer file. In this way, we will reduce the number and volume of documents, as well as the time it takes to complete the customer's and our own information. On. We will extend the methods and processes for electronic submission, such as qualified electronic signatures and other secure technical devices.

We will establish a plan and organisation for annual testing of our technical systems that ensure data confidentiality and protection.

ESG competencies



In what directions will BACB develop ESG competencies for its employees?

The role that banks play in the transition to a sustainable economy is to manage financial flows and, in particular, to channel them towards economic activities with positive mpacts on the environment and society. For us, this is a responsibility and means that we need to build knowledge and create internal capacity on sustainability issues. So for us here are two areas where we need to build up knowledge and expertise. On the one mand, this means knowledge of ESG issues, related regulations, tools for assessing ESG isks and for managing sustainability topics.

within the Bank. On the other hand, we also need to know enough about topics that are not so significant for the Bank and its direct activities, but are essential for the different business sectors. That is, we need to know the criteria that determine in a clear and objective way whether the projects and activities we finance are sustainable. In this way we will provide support to clients in increasing their level of involvement in the development of such projects.

> *Ilian Georgiev Chief Executive Officer*

In 2022, Management decided to increase the focus on sustainability coordination and management activities in the Bank. In the same year, an ESG team of two staff members was formed and functions from different departments are involved in different aspects of ESG governance according to their area of expertise. The core team is involved in the development and implementation of ESG policies in the Bank's operations. In addition, the team supports capacity building of BACB staff focused on ESG factors work and is responsible for ensuring compliance with the Bank's policies related to sustainability.

External professional training of staff was conducted in 2022 to build capacity and understanding of ESG and sustainable finance topics. The training involved staff from the Corporate Banking Directorate, Retail Banking Directorate, the

"European Programmes and Sustainable Development.

Work with external consultants to improve and expand knowledge on the topics of

sustainable management, reporting and inventory of greenhouse gases.

The main goal we set ourselves is to build and maintain a high level of ESG competencies for every employee in the Bank.

To achieve this goal, we plan:

- increase the ESG team by one more employee
- ESG training successfully completed for over 95% of staff by 2027
- integrating ESG into annual training plans in line with the duties and responsibilities of the function concerned
- Provision of ESG training to 100% of direct access customers by 2025
- Annual training for ESG team regulations and risk management to update ESG knowledge

Operational efficiency

For us, it is the Bank's ability to provide products and services to its customers in the **most efficient way possible**, while ensuring the high quality of its products and services. We create internal processes to improve operational efficiency in two aspects: **internal operations and customer interaction**.

> Interaction with customers Software solutions that facilitate communication, data collection and improve the customer experience

Internal operational activity Optimization of time, effort and materials in our daily tasks. Building operational and administrative internal processes for data collection and processing. Digitalization of the banking operating model

Internal operational activity

Constantly changing legislation, complex administrative processes and our desire to improve individual elements of our operational work require the introduction of an appropriate approach to the change management process. Therefore, with the help of the Information and Technical Support department, we created the internal system "Mantis". This is an IT solution that enables colleagues to initiate changes to a process or a specific step in a process and find a solution to improve it.

We also automated the process for approving administrative expenses, requesting and approving leave. The Central Credit Register checks have also been automated using new software applications.

The epidemic of Kovid in the past years has matu-

gave the practice of conducting a large part of the Bank's operational meetings and corporate body meetings remotely. This saved a significant amount of time spent discussing operational issues and freed up a larger repor- s with a focus on the Bank's customers.

In 2022, we analyzed the processes in the offices related to customer service, specifically customer registration, account opening, and debit and credit card issuance. We launched a project to optimize, automate and digitize these processes, including the creation of an electronic customer file. We are planning to create a new Process Optimisation and Transformation Unit in the Payments Directorate to lead and administer this project with the aim of improving the customer experience, reducing processing times, making it easier for employees in the offices (which will free up sales resources) and moving towards paperless processes.

Interaction with customers

To improve customer experience and satisfaction and reduce operational costs, we invested in the creation of a series of products providing online transactions and modern digital banking.

The environmental benefits achieved through these products are in the direction of resource-efficient service, reduced energy, consumable and transport costs and no loss of user time.

In an environment of increasing need for information and its administration, we are working to improve systems for collecting, processing and using data. This requires the creation of appropriate systems also for the new ESG aspects of our work - ESG



banking products, ESG reporting and the overall management of ESG processes. At the same time, we need to maintain focus on our core business processes, reduce the effects of administrative processing of large amounts of documents and make it easier to work with our customers.

Therefore, as a first step in this process, we need to define in the greatest detail the scope of the data that is required by our customers and in our internal administration. In the next two years we will prepare questionnaires to assess the ESG performance of our clients and their projects, plans to communicate ESG issues with them, and an information campaign to prepare them to provide the necessary documents.



BACB Online and BACB Mobile

A remote banking platform that provides web and mobile application. The platform combines modern intuitive remote banking applications with modern design and high level of security.

Alongside standard payment transactions, the applications provide the opportunity to o p e n new products and manage existing products and services.

Online account and card opening

Individual customers can open a checking account and apply for a debit card through a specially developed platform. From 2023, we plan to offer an online account opening process to legal entity customers.

Online credit

Application, identification and drawdown of the funds are completely remote and do not require a visit to the Bank. Documents are exchanged electronically and signed with an electronic signature.

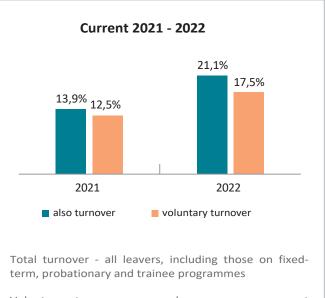
Online deposit

The online deposit is offered to new customers of BACB - Bulgarian citizens or citizens with post- yan residence in Bulgaria, who do not have and have not had accounts with the Bank or who had only online deposits at the time of submitting a new application for such.

Motivation and engagement of employees

The work of bank employees has become increasingly challenging and demanding in recent years. We work in a highly regulated sector, which makes it unattractive. We need to be aware of and comply with changing local legislation and European regulations. We are changing and adapting internal processes and policies, as well as introducing new technologies and systems of work. We take care to meet the increasing demands of clients, to administer the huge document turnover. We also take into account a number of other factors that make the work process responsible and difficult.

Contemporary analyses show that more and more people are considering changing their jobs, and changing from one banking sector to another is a trend. The new job or the decision to stay in the current job is a complex set of criteria, including higher remuneration, more flexibility in working hours and location, development opportunities, good personal relationships with colleagues and good managers. Younger employees tend to be more changeoriented and do not stay permanently in the workplace. At the same time, there is a lack of qualified staff. These trends are factors we consider when looking for solutions to attract and retain successful employees. The turnover in BACB in 2021 is close to the average for the sector. In 2022, the level of leavers has risen and we have lost some staff recruited in the last year. This is a result of the market trend for frequent job changes among young people, seeking opportunities in other sectors and trying new types of pro- fessions. Another reason is that Kovid created habits of teleworking that were discontinued after the restrictions were lifted.



Voluntary turnover - employees on permanent contracts who have decided to leave



What do you value most about working at BACB?

At BACB I value communication and interaction with the team. Difficult situations are taken as common and together we find solutions. I always find assistance and support from colleagues in all departments. Communication in the organization is distinguished by speed and accessibility at all levels. In 17 years of working in the sector, I have found the greatest empathy here.

What attracts you to work in the banking sector?

To find new opportunities in the industry's toughest challenges. Intervening in a key moment for someone's business, or life, and allowing ideas to develop and come to fruition is very motivating for me. Communicating with businesses from that point on is even more of a pleasure. This creates the condition for trust and long-term relationships with clients.

Milen Stoyanov Customer Relationship Expert



What do we do to motivate and engage our employees?

The process of motivating and engaging the Bank's employees begins with each new appointment. When recruiting new staff, we conduct a clear and transparent selection procedure that ensures objectivity in the selection of candidates. In cases where there are insufficient qualified candidates, we select those who demonstrate the necessary qualities and motivation, with a view to investing in their training and development. Often, internal candidates take up the higher positions, which allows for career development. We organise internship programmes to attract more young and capable people interested in banking.

In order to retain our employees, we conduct surveys every year on salary levels in the sector. We investigate the reasons for the changes. Where necessary, we update employee remuneration, as we did twice in 2022 to mitigate the effects of increased inflation. We provide a social programme that we continuously improve. In addition to their basic salary, our employees receive additional annual leave, supplementary health insurance, a sports programme, preferential credit terms and other benefits. During the reporting period, we conducted surveys on satisfaction with the social package and health insurance conditions and took the survey results into account when updating our social program.

A system has been developed for the annual appraisal of employee performance and the payment of prorated salaries. Those who excel and receive a high performance rating according to clear and objective criteria receive additional remuneration in the form of a bonus. The main skills in which employees are assessed are personal, professional and managerial competence, maintaining professional relationships and contributing to the achievement of BACB's strategic objectives. Percentage of total employees who participate in annual personal performance presentations and career development discussions - directors, heads of independent departments.



We are working to create a good microclimate in the Bank, which includes improving the physical environment for our employees and building and maintaining good team relationships. Our organization is small and this shortens the path of communication from lower to higher levels and back. We take this opportunity to encourage our colleagues to be proactive in sharing ideas with Bank management to improve workflow. When a proposal is accepted, we support its implementation.

Cov- ers reality has made teleworking a short-term solution that alienates employees and limits opportunities for interaction. In order to foster social com- munity and reduce the distance between colleagues, we organised additional events to bring the team together and share the Bank's values.

In 2023 we will develop a methodology for microclimate research. The purpose of this study is to identify various indications that create attitudes about turnover, influence the relationship in the organization and the motivation and commitment of the team.



What is it like for you to have employees engaged?

or us, commitment is linked to a sense of belonging to the Bank. It means being part f a whole - the Bank's team, sharing the values of the organisation, feeling good and Ipported by the organisation you work for.

> **Silvia Kirilova,** Member of the Management Board of BACB AD

Employee engagement and motivation is a significant issue for the banking sector, where the main negative trend is the high staff turnover and employee attrition. In order to curb the effects of this process on BACB, the Bank's management has set clear objectives and is developing mechanisms to reverse its effects.

The Bank's main objective is to reduce the voluntary staff turnover rate below 15% by 2025, or by approximately 1% each year compared to the 2022 figure (17.5%).

The first step in achieving this goal is to conduct an annual survey of remuneration policies in the sector and present the results to the Bank's team at the end of each year. Transparent communication of the results of this process is important to increase the level of trust between employees and BACB management. In 2023, we plan to create a survey instrument and a methodology to assess the results to determine the level of employee satisfaction. We will c o n d u c t the first survey at the end of the year. This will mark the beginning of a more in-depth process of interaction with the Bank's team. We will explore the factors that create motivation and satisfaction in order to highlight those that we as an employer can influence and improve.

The results of both surveys will communicate with the employees, which is important for improving the level of trust between them and the Management.

We will also continue to investigate the extent to which the proposed social package is approved by the teams, with the main objective of achieving a satisfaction rate of over 50%. In 2024, we will upgrade the annual performance appraisal process for each employee. We will improve the current rules and procedures for appraisal and performance reporting for each employee in the Bank by developing a clear performance incentive mechanism linked to additional variable remuneration.

Heads of individual units play an important role in creating a motivating and supportive working environment. Their behaviour and interaction with the team are of great importance for building a strong corporate culture and implementing the Bank's values. That is why in the next two years we plan to conduct trainings related to the development of conscious leadership for the managers in our organization and the improvement of leadership abilities. The aim is to encourage team managers to improve their understanding of the impact of their management style on BACB's employees, culture and success.

Development of human capital

The development of human capital is related to the creation of conditions for each employee to upgrade his/her professional skills and knowledge to an extent that satisfies his/her professional am- bitions and, at the same time, satisfies the needs of the organisation.

nisation to achieve its business objectives.

We provide development opportunities for our employees by providing the necessary internal and external training. An internal organisation has been established to communicate the training needs of each structural unit in the Bank. Annually, the heads of the individual units draw up a plan schedule that is tailored to the current needs of the team to improve their professional qualifications.

Trainings and seminars are held with external experts on changes in legal requirements, European regulations and other topical issues. Internal trainings are conducted by experienced staff members, in the implementation of specific Bank policies, innovations in organisational processes and any other case that requires knowledge sharing and interaction on common topics and issues.

Each newly appointed employee shall be given induction training according to an established programme in order to familiarise him/her with the specifics of the organisation, internal policies and rules, work systems and applications, and other features of his/her position. The training shall be organised, led and supervised by the head of the unit to which the staff member is assigned. If necessary, the head of the unit may designate a mentor for the induction of the newly appointed staff member. The Human Capital Development and Employee Motivation and Engagement themes are managed by the Bank's Human Resources team.



Human rights, diversity and inclusion

We believe that diversity and creating a stimulating work environment where everyone feels they can be themselves is critical to the Bank's credibility and long-term success. BACB has zero tolerance for all forms of discrimination and disregard for equality of opportunity regardless of gender, sexual orientation, physical ability, age, religion or belief, race or ethnicity. Respect for and protection of human rights and acceptance of diversity are enshrined in our Code of Ethics.

Women in our organization can count on equal conditions with men, both in the opportunity to start work and career development in the Bank. In 2022, the proportion of women on the BACB Board of Directors increased to equal that of men. The lower percentage of women on the Supervisory Board (33%) is the result of the small and uneven number of Board members - three in total.

Description	Unit of measure ment	2021			2022		
		men	women	Total	men	women	Total
Management employees < 30 years	lssue	0	0	0	1	0	1
Employees in managerial positions from 30 to 50 years	lssue	25	21	46	24	26	50
Management employees >= 50 years	lssue	15	14	29	18	19	37
Total management staff	lssue	40	35	75	43	45	88

Role of administrative, management and control bodies	2021	2022
Board of Directors - men	60,00%	50,00%
Board of Directors - Women	40,00%	50,00%
Supervisory Board - men	66,67%	66,67%
Supervisory Board - Women	33,33%	33,33%
independent supervisory board members	33,33%	33,33%

Description	2021	2022
The pay gap between men and women	18,70%	15,00%
The pay gap between men and women - excluding support staff	15,22%	11,44%
The pay gap between men and women - including support staff / drivers, cleaners, maintenance /	50,00%	47,00%

Supporting the energy transition and managing direct climate impacts (E)

The role that banks play in helping the economy adapt to environmental change is significant. This is done by directing financial flows to the most sustainable sectors of the economy and creating financial incentives for environmentally friendly activities. For example, banks can offer lower interest rates or longer loan repayment periods to companies that invest in renewable energy, energy-efficient technologies and other low-emission projects.

Taking the lead in sustainable finance and supporting our clients in their sustainable transition also requires good personal example. It is imperative that we manage the environmental footprint we leave as a result of our operations and with our suppliers.

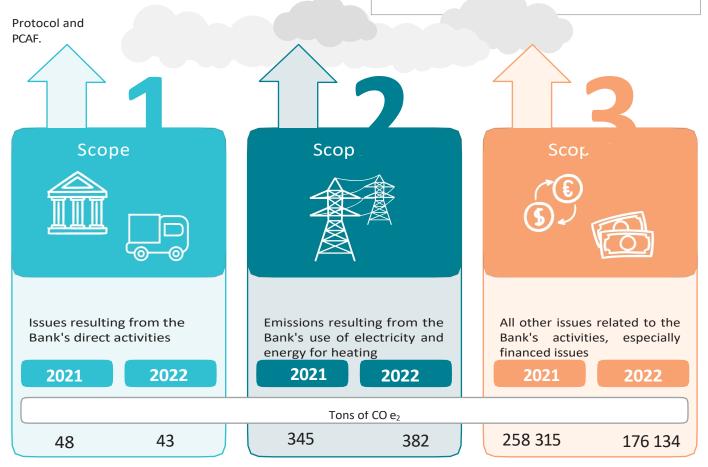
BACB has made the first calculation of all greenhouse gas emissions for 2021 and 2022 that result from the Bank's direct and indirect activities. This includes an inventory of emissions that are under the Bank's direct control (Scope 1 and 2), as well as an inventory of emissions over which the Bank can exercise indirect fhetrogic we used. For the Calculation is GHG



The Greenhouse Gas Protocol establishes universally accepted global standardized frameworks for measuring and managing greenhouse gas emissions from private and public sector operations, value chains and mitigation actions. The Protocol is the result of a 20-year partnership between the World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD).



The PCAF is a global partnership of financial institutions working together to develop and implement a harmonised approach for assessing and disclosing the greenhouse gas emissions associated with their investments and the loans they make to lending institutions.



Results of our first greenhouse gas (GHG) emissions inventory

	20	21	2022		
	Tons of CO ₂ - equivalent	Share of all emissio ns	Tons of CO ₂ - equivalent	Share of all emissio ns	
Scope 1: Issues from the Bank's direct activities	47,5	0,02%	42,7	0,02%	
Fuels: transport - petrol	10,2		11,2		
Fuels: transport - diesel	37,3		31,6		
Fuels: stationary combustion	0,0		0,0		
Refrigerants	0,0		0,0		
Scope 2: Emissions from electricity and energy used for heating (market-based ^{calculation6})	344,9	0,13%	382,2	0,22%	
Central heating	83,3		66,5		
Electricity consumption	261,6		315,6		
Scope 3: Value chain emissions	257 929,0	99,85%	177 623,9	99,76%	
Goods and services purchased Categories of the protocol for the PG: 31 Goods and services purchased 32 Capital goods 3.4 Upstream transport	1 816,8		2 081,8		
Fuel and energy related activities	32,5		30,3		
Waste generated by the Bank's activities	613,7		548,0		
Leased assets (downstream)	60,0		38,3		
Employee commuting			12,3		
Financed issues (mortgages)	1 484,5		1 842,8		
Financed issues (business loans)	253 921,5		173 070,4		
Total BACB	258 321,4	100%	178 048,8	100%	

^{6.} For the purposes of calculating the emissions generated by BACB's electricity consumption, the market-based method is used, which calculates emissions based on the electricity that the Bank has chosen to purchase, specified in contracts and/or instruments such as renewable energy certificates. This method is preferred to the alternative method based on the mes- sion. In the latter, calculations are made based on the emissions intensity of the local grid, without considering the complexity and ramifications of purchasing decisions on the energy mix.

Reducing carbon emissions and the environmental footprint resulting from our own operations

Emissions resulting from our own operations represent less than 0.5% on an annual basis relative to total emissions (scope 1 and 2). To minimize the effects of our operations on climate change, in 2021 and 2022 we improved the energy efficiency performance of the two largest buildings in which BACB operates by making renovations to replace the existing insulation with better-performing insulation. In 2022, we built a central air-conditioning system for one of them, and the same change is due in 2023 for our other building.

In order to carry out its core business, BACB purchases information and technical support services, financial transaction systems, utilities, consulting and brokerage services, stationery and office supplies, etc. All of these contribute to the final result of scope 3 issues for goods and services purchased. One of the main consumables in our operations is printing paper, with the amount of paper used amounting to 4,375 kilograms in 2022. In order to minimise emissions from the production of the paper used by BACB, a s w ell as the amount of waste paper, we aim to reduce the volume of paper contracted with our suppliers by 5% from 2022 by the end of 2024.

We plan to organise separate collection and recycling of paper and plastic waste from 2024.

The Bank is exploring options to purchase green electricity or install a renewable energy source to be implemented by 2025.

Indirect environmental impact: financial emissions -Scope 3 greenhouse gas emissions from loan portfolio

The bulk of the Bank's issuance, over 99% of the total, is financed issuance in the range of 3. Funded emissions are the greenhouse gas emissions associated with the total credit portfolio of the

Bank calculated based on the PCAF standard. Essentially, this is the carbon footprint of the loans of BACB's corporate and individual customers.

The standard's methodology requires mapping the sectors and their exposures to the Bank's portfolio and applying an issuance PCAF factor. The data available to us from our clients suggests a calculation that is consistent with Level ⁴⁷ data quality. This level allows for an over- or underestimation of the final result, as it does not use customer-reported and verified data, but comparative and market-based issuance factors. The majority of corporate customers are small and medium-sized enterprises that do not have estimated GHG emissions data. The Bank's large corporate clients are expected to provide carbon footprint data with the entry of the Corporate Sustainability Reporting Directive after 2025. The over- or under-estimation of the final result is a factor that hinders objective analysis and quantification of the final value associated with the reduction of Bank-financed emissions.

Calculations related to financed issues of mortgage loans to individuals have better limitations. This formula uses data related to average emissions per household, based on statistical data. A better calculation assumes ^{data8} related to the actual energy consumption or energy certification of the residential building, which is not available to the Bank.

The results of the funded emissions inventory and current and desired data level information are reflected in the following table.

7. PCAF (2022). The Global GHG Accounting and Reporting Standard Part A: Financed Emissions. Second Edition, 5.2 Business loans and unlisted equity, Table 5-7. General description of the data quality score table for business loans and unlisted equity

8. PCAF (2022). The Global GHG Accounting and Reporting Standard Part A: Financed Emissions. Second Edition, 5.5 Mortgages, Table 5-15. General description of the data quality score table for mortgages

Supporting the energy transition and managing direct climate impacts (E)

	2021 2022		22	PCAF data	PCAF data	
Calculated issuance against loan portfolio/financing sectors	Funded emissions			level - current	level -	
	tCO e ₂	%	tCO e ₂	%	calculations	desired level
Trade in fuels	46 865	18%	4 563	3%		
Agriculture	42 072	16%	39 655	23%		
Wholesale	27 397	11%	6 199	4%		
Livestock	27 212	11%	19 471	11%		
Construction	26 786	10%	37 885	22%		
Manufacture of chemicals	24 143	9%	902	1%		
Food production	8 552	3%	15 996	9%		
Land transport	8 363	3%	4 000	2%		
Sea transport	6 834	3%	52	0%	Score 4 (3a)	Score 2 (1b)
Air transport	5 819	2%	1 165	1%		
Trade in motor vehicles	4 644	2%	5 244	3%		
Recycling of waste	4 278	2%	595	0%		
Hospitality	2 920	1%	7 795	4%		
Manufacture of rubber and plastics	2 385	1%	3 910	2%		
Manufacture of metal products	2 072	1%	3 387	2%		
Real Estate	1 667	1%	2 338	1%		
Other sectors	11 913	5%	19 912	11%		
Mortgage loans - individuals	1 484	1%	1 843	1%	Score 5 (3)	Score 3 (2a)
Total emissions financed	255 406	100%	174 913	100%		

For us, the measurement of greenhouse gases resulting from our direct and indirect activities is the beginning of the formalisation of the process of managing the impacts we have on the subject.

"Climate." In fact, decarbonisation of the loan portfolio and targeting of funds towards low-cost projects and activities is a policy of BACB that we applied during the reporting period. In 2021 and 2022, the projects we financed focused on renewable energy generation and the use of low-emission transport vehicles. For more information, please see the Sustainable Finance section.

BACB's objectives in supporting the energy transition and the management of fin- anced emissions are:

- Improve our inventory process to achieve greater objectivity in the results, which we can use to set specific, measurable targets to reduce the footprint of our loan portfolio. This can happen by increasing the level of data collected from our customers.
- Continue to invest in low-carbon technologies and look for new opportunities and projects that meet the technical criteria of the EU Taxonomy to meet the targets.
 - "Climate Change Mitigation" and "Climate Change Adaptation". This in turn requires support and guidance to clients to improve their resilience indicators. We will provide these through the creation of in- formation materials and templates for data collection related to resilience indicators.

Awards, awards

In recent years, we have channelled a large part of the funds we manage into alternative energy projects, those that support organic agriculture, sustainable urban environments and others related to the green transition. This has earned us the image of Green Bank of the Year in 5 of the last 10 years.

Bulgarian-American Credit Bank was awarded the prize for "Greenest Bank" in the b2b Media 2021 competition "Bulgaria's Greenest Companies" for implementing sustainable green policies, organizing campaigns that have a positive effect on the environment, creating green products and communicating them in the public space.





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