

ESS disclosure report form for subprojects

Environmental and social report(s) disclosure

Accredited entity	MUFG Bank, Ltd.
Programme	
FP number and programme title	FP197: The Green Guarantee Company ("GGC")
Sector (public or private)	Private
Location (target country and, if any, specific areas)	Indonesia, The Philippines, Brazil, Trinidad and Tobago, Lao PDR, India, Gabon and Rwanda
ESS category	Category I-2
Board decision and date	Decision B.34/10, para. (h), on 20 October 2022
Subproject	
Subproject title	HSBC India Framework (the 'Framework')
ESS category	Category I-2
Location	India (Framework is applicable across India in locations to be determined by borrowers of HSBC India)
Environmental and Social Impact Assessment (ESIA) (if applicable)	
Date of disclosure on accredited entity's website	26 th August, 2025
Language(s) understandable to affected peoples	<p>The proposed sub-project is a Framework between the GGC and HSBC India which is intended to streamline guarantee issuance in support of HSBC's lending to renewable energy generation and/or clean energy product manufacturing (the 'transactions'). HSBC India, being one of the stakeholders, uses English as their official business language.</p> <p>The borrowers of HSBC India (the 'end borrowers') are also stakeholders to this Framework. They are expected to be similar to HSBC's existing client portfolio, consisting of large corporates that have experience with global financial market requirements. English is expected to be the official language for these large corporates and hence, is the language for this disclosure.</p> <p>The specific transactions under this Framework have yet to be identified, but where applicable will have their stakeholder engagement process, which is a requirement under the Equator Principles (in which HSBC is a signatory since 2003) and GGC ESMS (GCF approved document). The appropriate local language(s) will be used for those engagements, to suit the transaction specific location(s) and stakeholders.</p>
Link to disclosure	https://www.mufgemea.com/green-climate-fund-projects/green-guarantee-company/ The documents are: <ul style="list-style-type: none"> • HSBC India Framework E&S Due Diligence (English) • HSBC India Framework E&S Due Diligence (Hindi)
Other link(s)	N/A
Remarks on compliance with GCF policies	The eligible transactions within the Framework will be covered by a GGC guarantee, enabling enhanced capital deployment to clean energy initiatives in India. As the individual transactions

	<p>have yet to be identified, ESIA's for Category B transactions under this sub-project (the Framework), when available, will be assessed in accordance with GGC's ESMS and investment decision in adherence to all requirements as approved by GCF. Hence, for this disclosure, an E&S Due Diligence (ESDD) is an applicable assessment procedure and reporting mechanism on the policies and procedures governing the Framework.</p> <p>The ESDD concludes that the HSBC policies are in alignment with the GGC ESMS, as the HSBC is a signatory of the Equator Principles (underpinned by the International Finance Corporation's Performance Standards) and has gone through the GCF accreditation process. There is no corrective actions required for the Framework.</p> <p>At the operation stage of the Framework, where there are differences in the GGC's and HSBC's requirements, the more stringent requirements will be applied.</p>
Environmental and Social Management Plan (ESMP) (if applicable)	
Date of disclosure on accredited entity's website	N/A
Language(s) understandable to affected peoples	N/A
Link to disclosure	N/A
Other link(s)	N/A
Remarks on compliance with GCF policies	<p>For the transactions under this Framework, which will be assessed in accordance with the GGC ESMS during the transaction screening process, the end borrowers are expected to provide ESMP documents that are specific to the transactions. Any gaps identified with their corresponding corrective actions will be recorded using an ESAP that aligns with the template in the GGC ESMS. GGC will work with HSBC India to identify actions required by the end borrowers of those transactions.</p>
Environmental and Social Management System (ESMS) (if applicable)	
Date of disclosure on accredited entity's website	N/A – information is available on HSBC's website (links below)
Language(s) understandable to affected peoples	Refer to ESIA section above.
Link to disclosure	The Equator Principles form the guiding principles to HSBC's ESMS. The Equator Principles EP4 July2020
Other link(s)	Introduction to HSBC's Sustainability Risk Policies: Sustainability risk Managing risk HSBC Holdings plc
Remarks on compliance with GCF policies	<p>The Equator Principles (EP) and the GGC ESMS are adopted for this Framework, to assess and manage environmental and social risks, and impacts of the transactions under the Framework. The EP is in strong alignment with the GGC ESMS, which is consistent with the requirements for a Category I-2 programme under the GCF policies. Where differences arise between the two, the more stringent requirement will apply.</p>

	<p>In accordance with MUFG Bank, Ltd.'s policies, as Accredited Entity, and the Green Climate Fund's Information Disclosure Policy (the "GCF Policy"), this disclosure is intended to satisfy the requirement set out in paragraph 17 of the GCF Policy to disclose an ESMS, at least 30 days in advance of the Accredited Entity's investment decision.</p>
Any other relevant ESS reports and/or disclosures (if applicable), e.g. Indigenous Peoples Plan (IPP), Indigenous Peoples Planning Framework (IPPF), Resettlement Action Plan (RAP), Resettlement Policy Framework (RPF)	
<p>Description of report/disclosure</p>	<p>All transactions under this Framework will be screened and assessed by GGC, using the GGC ESMS. HSBC's policies and practices are therefore expected to meet the environmental and social safeguards required by GGC and the Green Climate Fund (GCF). HSBC has long embedded environmental and social risk management into its financing decisions, having adopted the Equator Principles (EP) in 2003. Its internal sustainability framework is well-developed and closely aligned with the IFC Performance Standards (PS), which form the backbone of the EP. The bank applies the IFC PS across its transaction portfolio, particularly for greenfield infrastructure, and reinforces them with sector-specific policies covering energy, mining, agriculture, forestry, and sensitive ecological zones. These policies include clear exclusions and mitigation measures, especially around pollution, biodiversity, and cultural heritage.</p> <p>HSBC routinely requires Environmental and Social Management Plans (ESMPs) and, where needed, Equator Principles Action Plans (EPAPs) to close any gaps. Independent monitoring and reporting are standard for high-risk transactions, and stakeholder engagement—including Free, Prior and Informed Consent (FPIC) for Indigenous Peoples—is treated as a core requirement.</p> <p>While HSBC's disclosure practices are robust under EP guidelines, GCF's Information Disclosure Policy may require additional transparency. Nonetheless, HSBC is well-positioned to meet these expectations.</p> <p>Grievance mechanisms will be incorporated into transaction-level ESMS, ensuring affected communities have access to redress. Given HSBC's track record and institutional capacity, it is reasonable to expect full adherence to both EP and GCF standards.</p> <p>When GGC provides a guarantee, HSBC will be required to comply with all applicable GCF policies, including those on safeguards, disclosure, and stakeholder engagement.</p>

Date of disclosure on accredited entity's website	N/A
Language(s) understandable to affected peoples	N/A
Link to disclosure	N/A
Other link(s)	N/A
Remarks on compliance with GCF policies	N/A
Disclosure in location(s) convenient to affected peoples (or, if none or not yet identified, to stakeholders)	
Date(s)	N/A – Printed/physical versions to be made available upon request at location of MUFG Bank's India Branches.
Place(s)	<p>All relevant disclosure materials will be made available at MUFG Bank's India Branches upon request, as they can be printed from MUFG Bank's GCF Webpage as and when needed.</p> <p>Please see below for the list of MUFG Bank's India Office Locations:</p> <ul style="list-style-type: none"> • Bengaluru Branch: Unit No 701A, 7th Floor, World Trade Center, Brigade Gateway Campus, 26/1, Dr. Rajkumar Road, Malleswaram West, Bengaluru ? 560 055, India • Chennai Branch: Seshachalam Centre, 7th Floor, 636/1, Anna Salai, Nandanam, Chennai 600 035, India • Mumbai Branch: 602 & 603, Level 6, Inspire BKC, 'G' Block, BKC Main Road, Bandra Kurla Complex, Bandra East, Mumbai 400 051, India • Neemrana Branch: Office No. 10, Ground Floor, Commercial Plot No. 9, Japanese Zone, NICM, Neemrana Alwar, Rajasthan - 301 705, India • New Delhi Branch: 5th Floor, Worldmark 2, Asset 8, Aerocity, New Delhi 110037, India • GIFT Branch: Unit no. 604, 6th floor, Brigade International Financial Center (BIFC), GIFT SEZ Zone 1 GIFT City, Gandhinagar Gujarat 382355, India <p>MUFG; Asia Pacific Global Network MUFG Bank</p>
Provision on disclosure at subproject level	<p>FAA Clause 11.04 (tt):</p> <p>In relation to each Sub-Project that is Category B (pursuant to the Environmental and Social Risk Categories), the Accredited Entity will ensure that the Executing Entities disclose the ESIA and ESMP and, as appropriate, inclusive of the Land Acquisition and/or Resettlement Action Plan ("LARAP") and any other associated information including those relevant to indigenous peoples required to be disclosed pursuant to the Information Disclosure Policy and the Revised Environmental and Social Policy (each, the "Sub-Project Disclosure Package"). The Accredited Entity will contractually ensure that the Executing Entities according to their</p>

	environmental and social management system, shall disclose the Sub-Project Disclosure Package at least thirty (30) calendar days prior to the relevant Executing Entity's approval of the relevant Category B Sub-Project, in English and in local language (if not English), on its and the Accredited Entity's website and in locations convenient to the affected peoples, and within the same period the Accredited Entity shall submit the Sub-Project Disclosure Package to the Fund which shall include a link to the Accredited Entity's and Executing Entity's website to the Sub-Project Disclosure Package, for subsequent distribution to the GCF Board and the Fund's active observers and for publishing in the GCF website.
Date and place of accredited entity meeting	The meeting for the approval of the sub-project will be scheduled on or before 30 September 2025

Note: This form was prepared by the accredited entity stated above. For reference, the ESS disclosure report form for the programme is attached.

Please note that the ESS documents are subject to final review during the 30-days for Category B disclosure period.
