

SUSTAINABILITY REPORT



2025



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Introduction



CEO's Message



Bogd Bank believes that responsible banking and sustainable growth are essential to creating long-term value for our customers, employees, and the community we serve. Our Environmental, Social, and Governance (ESG) policy guides every decision we make toward building a more sustainable and inclusive future.

In 2025, we completed our first full-year greenhouse gas emissions inventory in accordance with the GHG Protocol standard. We successfully implemented a number of internal initiatives, including knowledge-sharing campaigns, the "Green Office" campaign, and the "Greening" campaign. Furthermore, more than 10,000 trees have been planted since 2022 under the "Billion Trees" fund.

On the social front, we are committed to promoting inclusive participation and prioritizing employee well-being. By year-end 2025, we had a total of 257 employees, 63.4% of whom are women. To support businesses led by women and SMEs, we successfully mobilized funding totaling more than 53 billion MNT from international organizations including EQ, AMP (TJ), and GGSF. This achievement is a concrete reflection of our unwavering commitment and values focused on promoting sustainable economic growth and creating equal opportunities.



At the governance level, we uphold the highest ethical standards as the foundation of responsible banking, ensuring transparency, accountability, and sound risk management. In 2025, we adopted an Anti-Corruption Policy and appointed a dedicated Board-level member responsible for sustainability. Our Moody's credit rating upgrade from B2/Stable to B1/Stable is a testament to our governance efforts.

Throughout 2025, Bogd Bank has continued to deepen the integration of ESG principles across all operations, working steadfastly together to build a sustainable, responsible, and prosperous future.

Respectfully,

G. Saruul
Chief Executive Officer



About the Sustainability Report

This report consolidates the environmental, social, and governance (ESG) activities and performance of Bogd Bank JSC for the period from January 1 to December 31, 2025.

The report was prepared in accordance with the international GRI Standards (2021) and the GRI Financial Services Sector Standard requirements, with relevant indicators identified and disclosed in line with these standards.

The greenhouse gas emissions calculations were performed in accordance with the GHG Protocol methodology. It should be noted that some of the numerical data used in these calculations are approximations based on available data and may not fully represent actual emission levels. Furthermore, the ESG information contained in this report has not been subject to independent third-party audit or verification.

The financial information contained in the report fully complies with the applicable laws of Mongolia and the regulatory requirements of the Bank of Mongolia.





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About Us

(GRI 2-1 - 2-6)



Bogd Bank 2025 Sustainability Report

1.1 General Organizational Information

Bogd Bank is a private commercial bank operating in Mongolia’s banking and financial services sector, continuously strengthening its competitiveness through customer-centric services, advanced digital solutions, and innovation-driven products and services. The Bank is committed to providing accessible, reliable, and efficient financial solutions while supporting sustainable growth, digital transformation, and long-term value creation for its customers, employees, and stakeholders.



1.2 Vision, Mission, and Values

VISION

To be a bank that inspires trust in the future, in oneself, and in the bank itself — by leveraging world-class standards, experience, next-generation approaches, and technological advancements to deliver banking and financial products, services, and value.

MISSION

To be a relationship-driven, technology-based bank that balances and sustainably meets the satisfaction of customers, employees, and investors, and achieves international benchmarks in service quality, accessibility, and efficiency.

VALUES

Every employee of the bank shall at all times uphold the values expressed by the Mongolian word “TRUST”, abiding by these cherished principles in the performance of their duties.

1.3 About Stakeholders (GRI 2-1 – 2-6)

Bogd Bank regularly engages with the following key stakeholders who may influence, or be influenced by, the Bank's operations. These include customers, employees, investors and international financial institutions, regulatory bodies, industry associations, and the general public and local communities.

In engaging with its stakeholders, the Bank uses the following channels to identify their needs and expectations and incorporate them into its operations:

- Customers — through branch networks, digital channels, customer satisfaction surveys, and call centers.
- Employees — through internal meetings, training, satisfaction surveys, and internal communication channels.
- Investors and international organizations — through regular reporting, meetings, monitoring, and evaluation processes.
- Regulatory bodies — through statutory reporting and inspection procedures.
- General public and local communities — through corporate social responsibility programs, financial literacy events, and public information campaigns.



The key expectations that stakeholders have of the Bank are centered around reliable and transparent operations, responsible financing, sustainable employee development, and making a positive impact on society.

Sustainable Development Strategy (GRI 2-22 - 2-23)



2.1 Our Engagement

Bogd Bank prioritizes environmentally friendly operations, social responsibility, and transparency as its core principles.

Within this framework, we joined the Mongolian Sustainable Finance Association and became an official member in 2015. Since then, Bogd Bank has consistently aligned the Sustainable Development Goals with its day-to-day operations and banking products and services.

Under the Bank's "Environmental, Social Responsibility, and Gender Equality Policy," sustainable finance principles are applied to lending operations, supporting environmental and social responsibility. Furthermore, within the ESG policy framework, the Bank focuses on implementing energy-efficient solutions, reducing water and paper consumption, recycling waste, and providing accessible and equitable services to all customers.



2.1 Our Engagement

Bogd Bank has successfully implemented the 8 principles of the ToC (Sustainable Finance Association) in its operations. Each year, we prepare an implementation report and submit it to the ToC Association, which is jointly evaluated and assessed by the Bank of Mongolia and the International Finance Corporation (IFC).

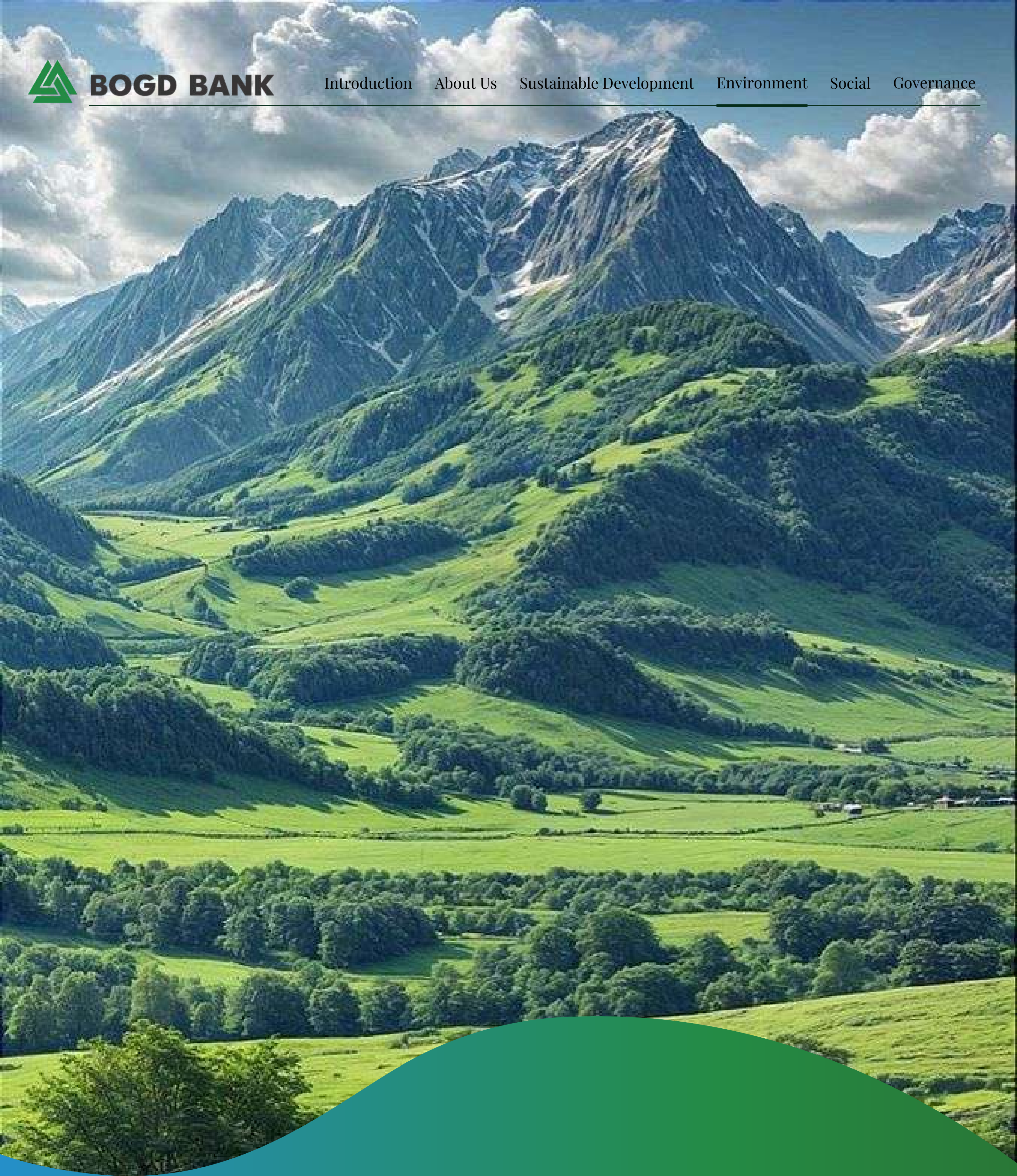
Bogd Bank has also established a dedicated working group for ToC-related activities, with representatives from every department and unit of the Bank. This arrangement enables not only the Bank's ToC department, but all other departments and units, to receive timely sustainability-related information and share it with other employees.



2.2 Priority ESG Topics (GRI 3 - Materiality)

The following material topics were identified for Bogd Bank in 2025:

Topic	Related GRI	Priority Level
Greenhouse Gas Emissions (Scope 1, 2)	GRI 305	High
Green Finance and Lending	GRI FS8	High
Gender Equality	GRI FS8	Medium
SME Financing	GRI FS7	High
Employee Development and Well-being	GRI 401, 404	Medium
Financial Inclusion	GRI FS13	High
Governance and Transparency	GRI 2-9 to 2-21	High
Resource Conservation	GRI 301, 303	Medium
Anti-Corruption	GRI 205	High
Information Security	GRI 418	High



Environment (GRI 300 Series)

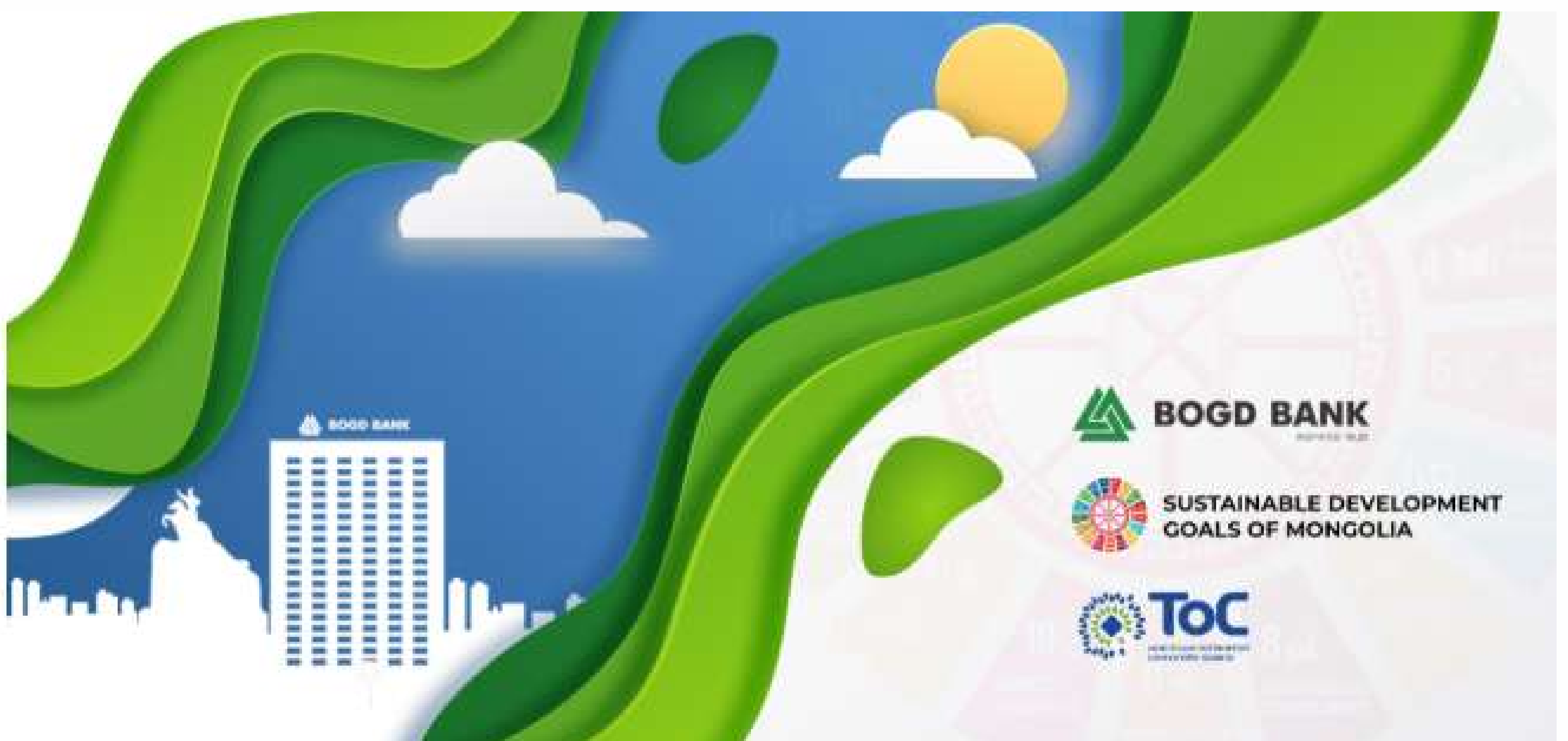


3. Environment



As part of its ESG initiatives, Bogd Bank encourages environmentally responsible consumer choices through financial products such as the Green Consumer Loan, Eco Car Loan and Insulation Loan. Through these sustainable finance products, the Bank aims to reduce environmental impact, promote eco-friendly consumption, and contribute to the transition toward a greener and more sustainable future.

Bogd Bank has consistently prioritized green finance, efficient resource utilization, and environmentally responsible operations as part of its commitment to sustainable development. The Bank actively supports sustainable business practices, reduces operational waste, and promotes energy efficiency and digital transformation across its activities.





3.1 Greenhouse Gas Emissions (GRI 305)

Beginning in 2025, Bogd Bank developed and internally approved a methodology for calculating Scope 1 and Scope 2 greenhouse gas emissions in accordance with the GHG Protocol standard, and commenced tracking the Bank's greenhouse gas emissions for 2025.

Total emissions as of 2025 is
377.72 tonnes of CO₂

Scope 1:

Direct greenhouse gas emissions from Bogd Bank's own operations amounted to 7.3 tonnes as of 2025.

Scope 2:

Emissions resulting from electricity consumption across all Bogd Bank branches, offices, locations, and electric vehicle charging stations amounted to 370.4 tonnes.

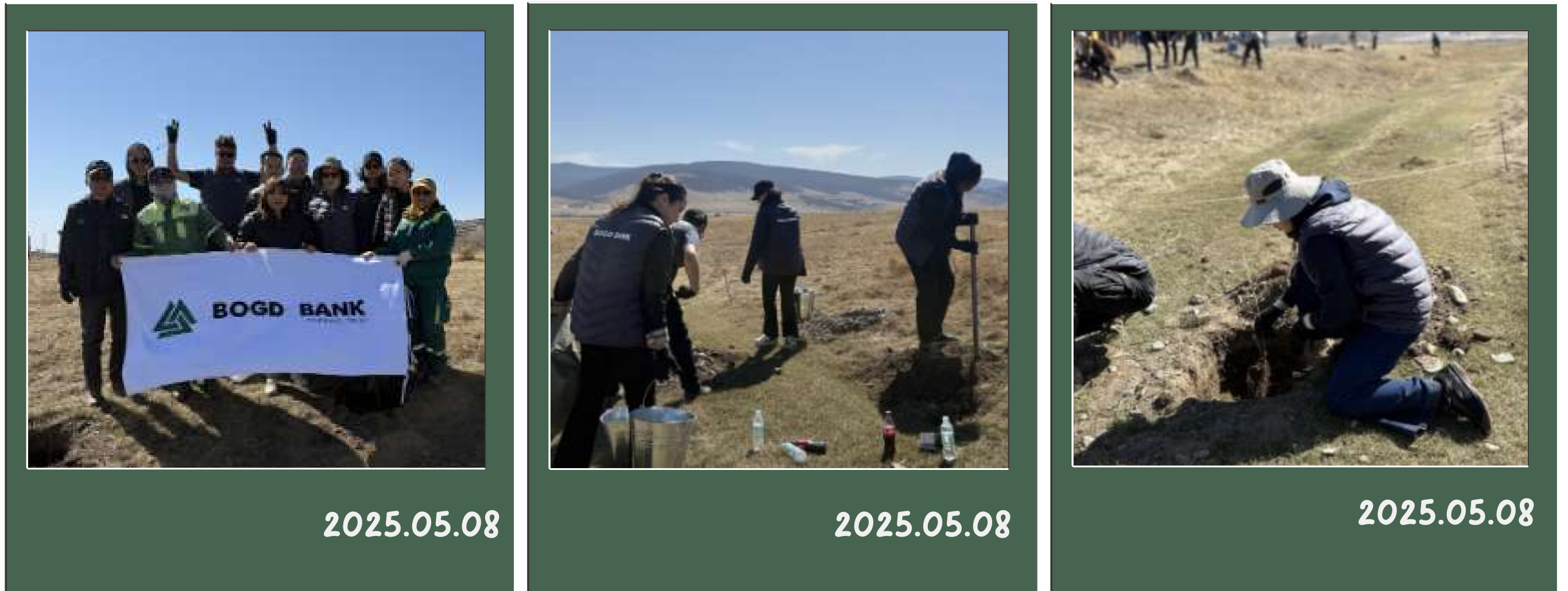
As some data required for certain calculations were not fully available, the results of this calculation are approximate estimates and may not fully represent actual emission levels. We aim to improve the accuracy of our assessment data going forward.



3.2 Green Initiatives

"Billion Trees" Fund

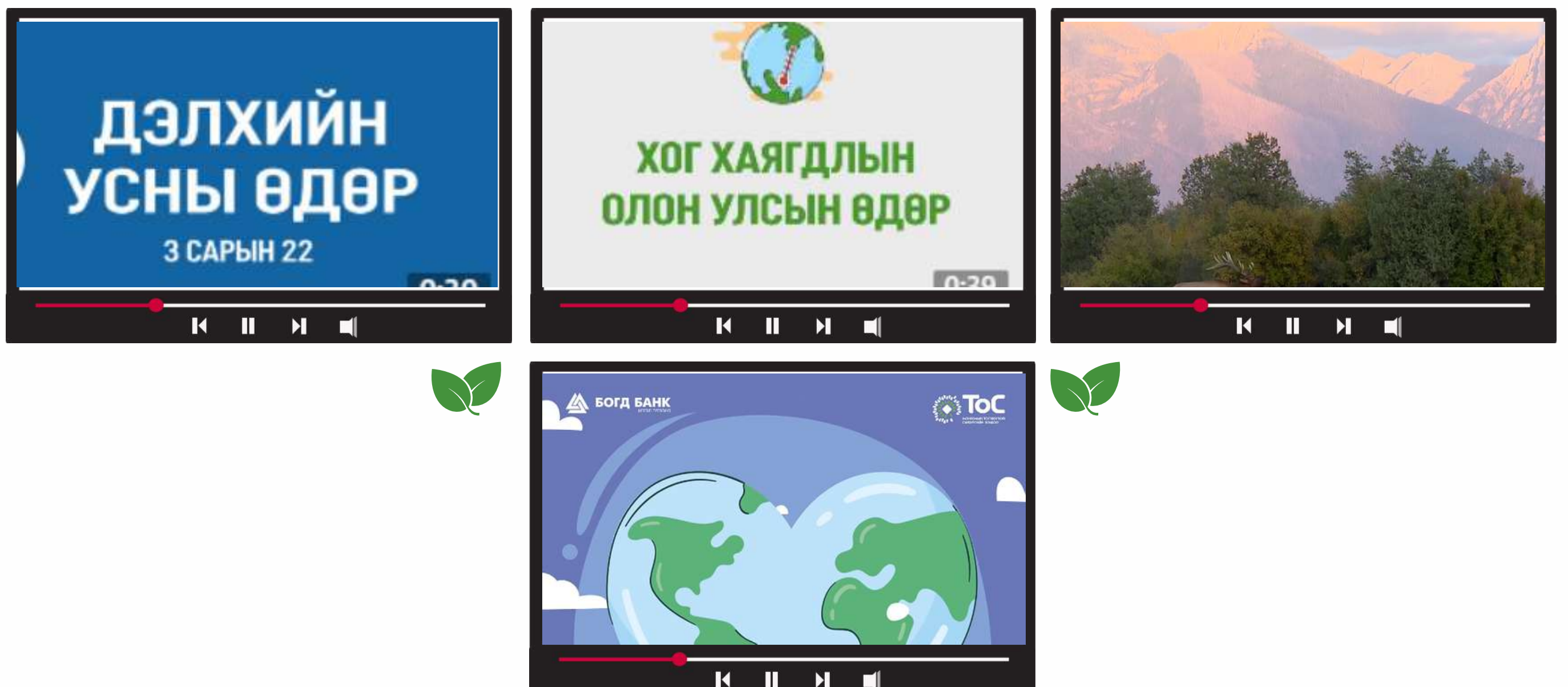
As part of the "Billion Trees" Fund, we plant trees every year. On May 8, 2025, commercial banks joined together at the Gachuurt Eco Park to plant trees organized under the Billion Trees Fund.



Approximately 12,500 coniferous and deciduous trees have been planted in total since 2022.

World Environment Days

We have begun preparing and disseminating information to the public in connection with world environmental observance days every month.



3.2 Green Initiatives

"GREEN OFFICE" Campaign

Bogd Bank successfully organized its first-ever internal "Green Office" campaign from June 16 to July 7, 2025.



The campaign, held under the slogan **"Every Initiative Brings Change"** aimed to provide employees with foundational knowledge about sustainable development and sustainable finance, raise awareness of the importance of these topics, and increase employee engagement.



3.2 Green Initiatives

"GREEN OFFICE" Campaign

The campaign covered a different topic each week and included a variety of engaging and accessible activities, such as sharing information and announcing employee challenges. This initiative became an important step in embedding sustainability as part of the organizational culture.



Key outcomes of the campaign:

- Increased understanding of sustainable development and sustainable finance
- Employees gained the ability to calculate their own greenhouse gas emissions
- Information and tips on reducing plastic consumption were shared
- Information and tips on reducing paper consumption were shared
- Employee participation was encouraged under the "Green Ideas" theme
- A call was made for employees to bring their own reusable cups to work to reduce plastic use
- A survey conducted during the campaign opened up the possibility of a new club forming among employees



3.2 Green Initiatives

"GREENING" Campaign

The "Greening" campaign was successfully implemented across the organization over a two-week period. Employees actively participated, contributing meaningfully to improving the work environment and fostering a positive atmosphere by gifting desk plants to their colleagues.



As a result of the campaign, employees in every department and unit received their own desk plants, visibly improving the internal atmosphere and collegial relationships. The addition of greenery to the office environment also produced positive effects such as improved air quality and increased employee focus and satisfaction.



This initiative aligned with sustainable development goals aimed at fostering employee participation, creating a healthy and pleasant working environment, and cultivating an environmentally conscious mindset.

3.3 Resource Conservation (GRI 301, 303)

Bogd Bank has implemented the following measures to reduce its environmental footprint and optimize resource use in its day-to-day operations.

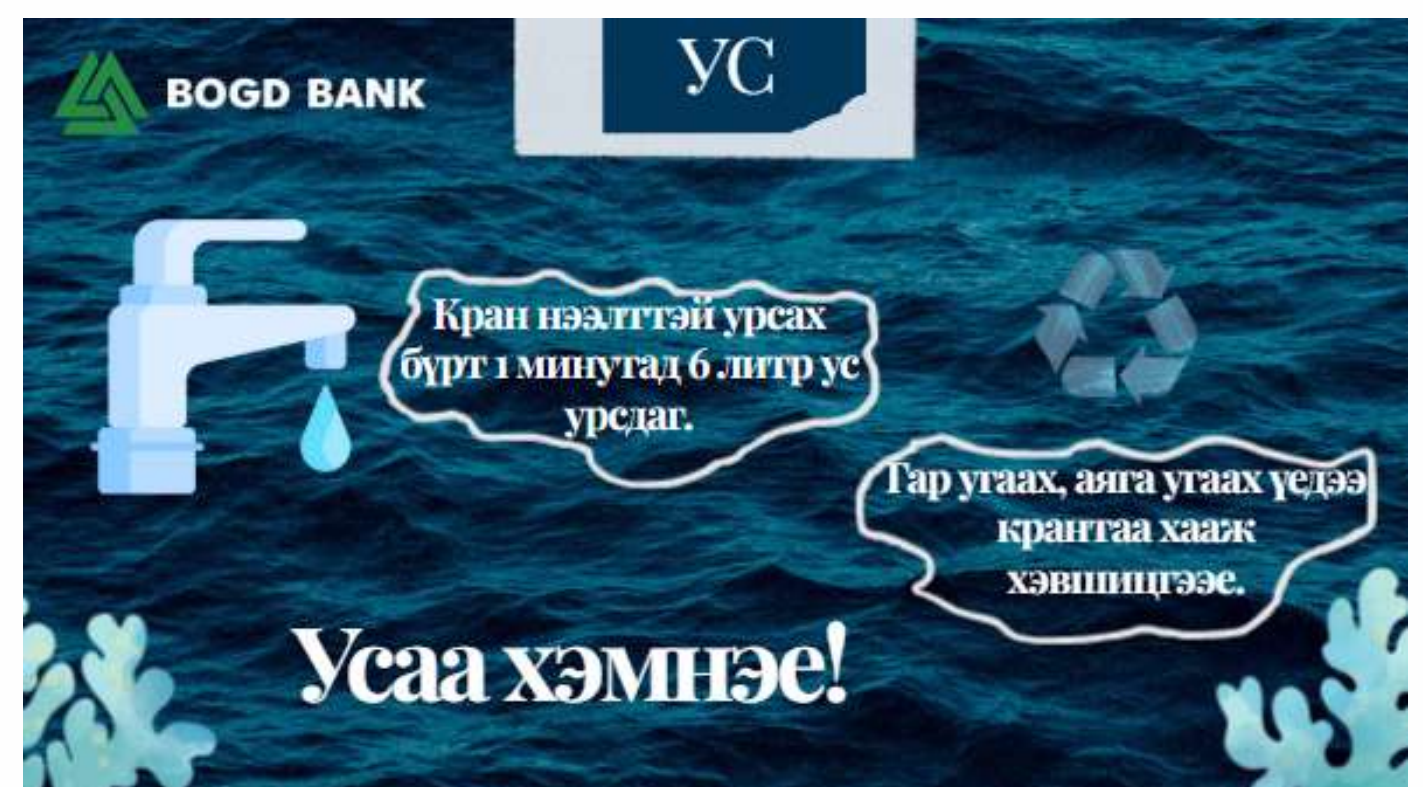
Office Supply Monitoring:

- Monthly paper consumption across branches is regularly monitored on a monthly basis and comparative analysis has been initiated, helping to improve resource planning.
- Paper consumption and printer ink usage are monitored, with loan disbursement data and other information displayed graphically to analyze efficiency for better decision-making.
- Printer and computer purchases were reduced by 80% in 2025 compared to previous year.
- A system of identifying surplus inventory at branches and headquarters and transferring it between locations has been regularly implemented across the organization.



Reducing Duplicate Purchases

A policy requiring that remaining and available stock be assessed before monthly budget purchases are discussed has been introduced, reducing duplicate procurement and eliminating wasteful spending.



Cultivating Sustainable Consumption Habits

The use of single-use cups and utensils at meetings and training sessions has been discontinued, and reusable ceramic cups and plates are now used regularly. This is an important step toward reducing waste and promoting sustainable consumption.



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Social

(GRI 400 Series)



Bogd Bank 2025 Sustainability Report

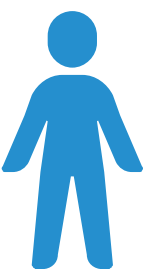
4. Social



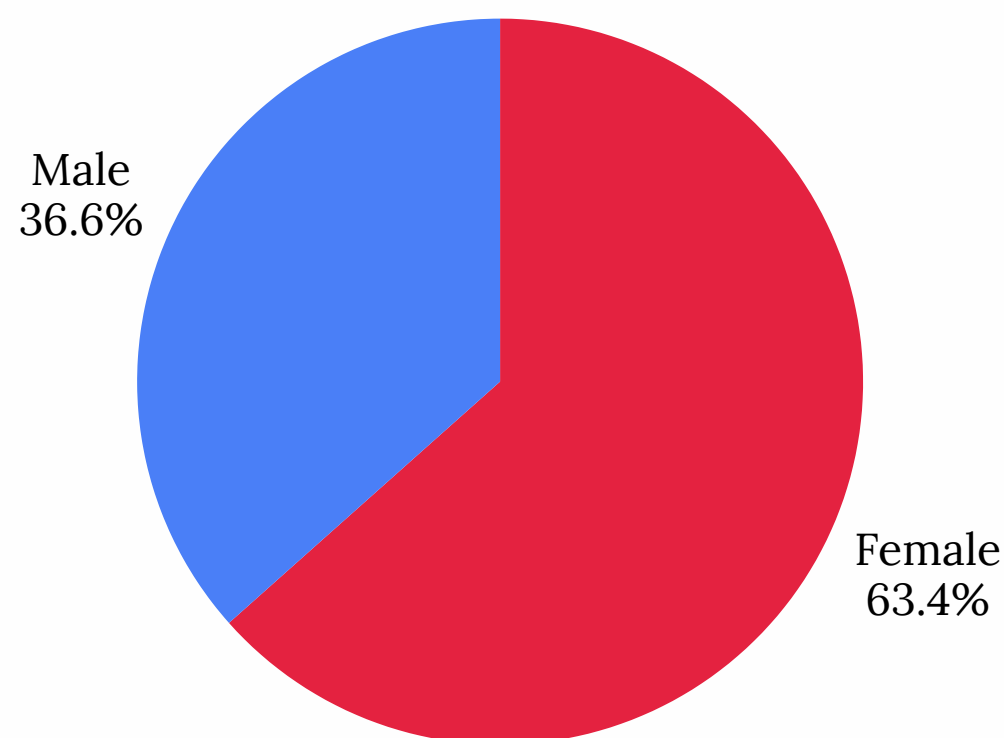
Bogd Bank works to create positive social impact through its ESG initiatives, including SME financing, promoting women's economic participation, expanding green lending, supporting rural development, and advancing digital transformation across its operations. These efforts are designed to foster more inclusive, resilient, and sustainable economic growth within the communities it serves.

4.1 Human Resources (GRI 401, 405)

Total number of employees **257**

 **36.6%**
Male

 **63.4%**
Female



Management Team
9

Male
7

Female
2

Average Indicators

Average Age **34** нас

Average Training duration **7** өдөр

4.2 Employee Development and Well-being (GRI 404)

During the reporting period, the bank implemented a range of initiatives aimed at developing employees' knowledge and skills, as well as ensuring a healthy, safe, and comfortable working environment.

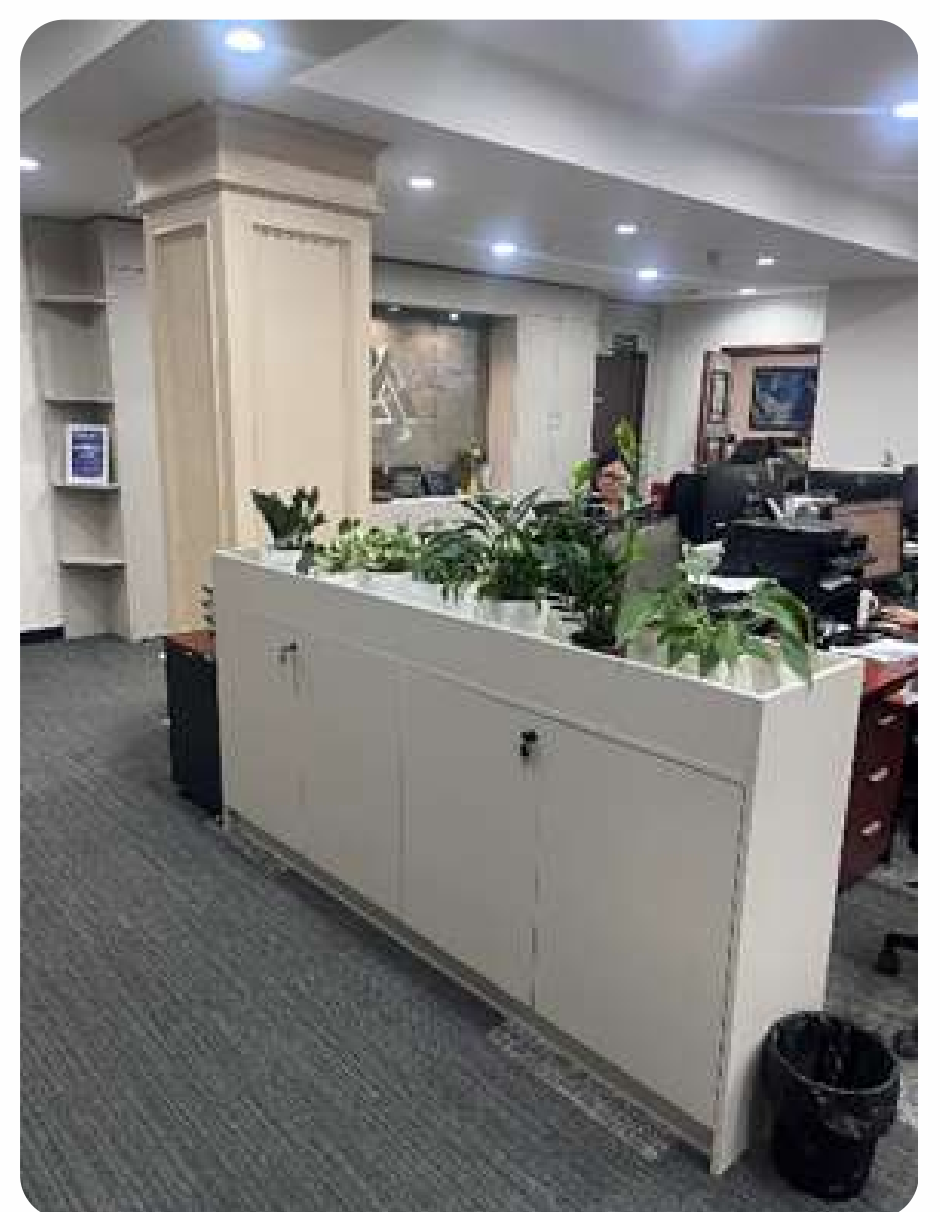
4.2 АЖИЛТНЫ ХӨГЖИЛ, сайн сайхан байдал (GRI 404)

To support the continuous development of employees, remote learning opportunities were expanded and an internal digital training platform was introduced. The quality of both external and internal training was improved, and the content and curriculum were enriched, creating conditions for employees to enhance their professional skills.



To promote employee well-being, base salaries for all employees were increased, supporting the value of labor. In addition, an initiative encouraging physical activity was implemented to promote employee health, and regular programs were organized to cultivate a culture of using the stairs instead of elevators.

To improve the working environment, the bank fully renovated and refurbished its back-office workspace to create a more comfortable, healthier, and more efficient setting. The redesign reduced the number of isolated rooms that limited airflow and introduced a more open-plan layout to improve ventilation and collaboration. Special attention was also given to the selection of building materials, incorporating eco-friendly, recyclable bamboo panels with low chemical emissions, along with sound-absorbing, odorless, and environmentally friendly solutions such as advanced Japanese flooring materials.



4.3 Occupational Health and Safety (GRI 403)



Activities related to fire safety and occupational safety are carried out regularly and continuously. The Bank operates in compliance with the "Emergency Fire Response Plan" developed in accordance with Order No. A/135 of the Director General of the National Emergency Management Agency.

Regular fire prevention and fire extinguisher training sessions are conducted for branch employees. In addition, the internal labor regulations are consistently observed in compliance with Mongolia's Labor Law, protecting and promoting the safety and rights of employees.

4.4 Financial Literacy and Financial Inclusion (GRI FS13, FS14)

Financial Literacy

"LEVEL UP" Program

Participated in the "Level Up" financial literacy event for high school students, supporting children's understanding of money.



Financial Literacy Video Content

New video content has been developed for young people to promote financial literacy, and information such as the 10/1 savings rule and personal financial management tips have been distributed.



Global Money Week Campaign

Participated in the Global Money Week campaign, organized in Mongolia for the 13th consecutive year under the slogan "Smart Financial Decisions — The Beginning of Tomorrow's Success," sharing information on avoiding online financial scams and managing emotions during challenging times.

4.4 Financial Literacy and Financial Inclusion

(GRI FS13, FS14)

Financial Inclusion and Promotional Campaigns

““Share a Memory” Savings Promotional Campaign

This campaign, which encouraged converting children's money into savings, was designed to support family financial planning. Customers who opened savings accounts during the campaign received travel prizes. This campaign made a significant contribution to increasing financial literacy and raising public awareness of the importance of saving.



““Itgel” Savings Gift Promotional Campaign

Through the "Itgel" (Trust) campaign, aimed at fostering a culture of saving, customers who opened new savings accounts received gift rewards, representing a first step toward a financially stable future. This campaign is viewed as tangible support aimed at encouraging citizens to save and approach their futures with confidence.



18% Interest Savings Product

A promotional campaign was conducted during the reporting period to incentivize existing savings holders, encouraging customers to grow their savings. The introduction of a high-interest savings product also created opportunities for regular savings accumulation.



4.4 Financial Literacy and Financial Inclusion

(GRI FS13, FS14)

Financial Inclusion and Promotional Campaigns



"Month Full of Gifts" Promotional Campaign

A "Month Full of Gifts" promotional campaign was successfully implemented for all savings account holders to welcome the New Year. The campaign offered New Year's gifts to customers who added income to their savings accounts, as well as to customers opening accounts for the first time, with the goal of boosting savings activity and growth.

"Refer a Friend" Promotional Campaign

To increase customer engagement and activity, a "Refer a Friend" promotional campaign was conducted over a one-month period, offering rewards to both the referring customer and the invited customer upon successful referral.



The Bank transitioned to the internationally compliant ISO13616 IBAN account numbering system, creating conditions for more reliable and efficient domestic and international payments for customers.

Payment Card Services



The following measures were implemented to improve the accessibility of payment services:

- Joined a collaboration to reduce ATM usage fees, lowering costs for customers
- Card ordering and card management services were digitized, enabling customers to access services remotely
- Cashback and promotional campaigns were implemented to encourage customer usage

4.4 Financial Literacy and Financial Inclusion

(GRI FS13, FS14)

Financial Inclusion and Promotional Campaigns

Supporting Small and Medium Enterprises (SMEs)

The Bank implemented an "SME Support Campaign" to support small and medium enterprises, which are a critical pillar of Mongolia's economy. The campaign focused not only on increasing access to financing, but also on giving special attention to women-led businesses and eco-friendly, energy-efficient projects.

Loan product conditions were also improved, with measures taken including extending working capital loan terms, providing fast-track service to repeat borrowers, and shortening collateral loan processing times. Additionally, customers were offered financial advisory services and opportunities for business development partnerships, aimed at supporting the sustainable growth of SMEs.



Insurance Brokerage Services

The Bank provides insurance brokerage services to reduce and prevent financial risks for customers, offering products covering property, life, health, and business risks.

During the reporting period, a long-term life insurance product for mortgage borrowers was introduced in collaboration with partner insurance companies, in compliance with applicable regulatory requirements, focusing on improving the financial protection of customers.

4.5 Sustainable Finance (GRI FS13, FS14)

Sustainable finance products offered by our Bank:



**ECO
CAR LOAN**



**GREEN
CONSUMER
LOAN**



**LOAN TO SUPPORT
WOMEN
ENTREPRENEURS**



**HOME
INSULATION
LOAN**

Sustainable Finance

In 2025, the Bank successfully mobilized medium-term financing aimed at supporting SMEs, the green sector, and women entrepreneurs. These include:

Financing from Enabling Capital investment fund:

- On April 23, 2025 (6th agreement) and December 17, 2025 (7th agreement), loan agreements were signed, successfully mobilizing a total of USD 8 million in medium-term financing. This financing is directed toward the SME and green sectors.

First financing from AMP (TJ) investment fund:

- On September 25, 2025, the first loan agreement was signed, successfully mobilizing a total of USD 5 million in medium-term financing. This financing is directed toward small and medium-sized enterprises.

Additional financing from GGSF (TJ) investment fund:

- On December 2, 2025, a second USD 5 million loan agreement was signed, with an initial disbursement of USD 2 million in medium-term financing. This financing is directed toward women entrepreneurs.



4.6 Public Communication

Employee Engagement and Internal Culture

"Sustainability Newsletter"

To strengthen the organizational culture, a monthly "Sustainability Newsletter" has been regularly distributed to employees.



This newsletter is notable for delivering key concepts and the importance of sustainable development to employees in a clear and accessible manner, while also including practical tips and solutions that can be applied in daily life and consumption. It also systematically delivers information introducing new terminology and trends related to sustainable development, aimed at enhancing employees' knowledge and understanding.

Furthermore, to support internal organizational culture, a "Bogd's Corner" section has been included, where employees share their own "green" habits and practices. This positively contributes to increasing collective engagement, spreading good practices, and promoting sustainable consumption.

4.6 Public Communication

Employee Engagement and Internal Culture

Sustainability Call-to-Action Added to Employee Email Signatures

In line with sustainable development goals, and to align the Bank's internal culture and communication style with environmentally friendly and responsible practices, a brief sustainability reminder was added to employees' email signatures. This has become an important step in embedding the values of the ESG into the daily communications of all employees across the organization.

Corporate Social Responsibility

As a member organization of the American Chamber of Commerce (AmCham), the Bank joined the organization's Corporate Social Responsibility (CSR) Committee during the reporting period. This has expanded opportunities to exchange experiences, participate in joint initiatives, and introduce best practices in the areas of corporate social responsibility and sustainable development.



Public Communication



Newsletter for Women Entrepreneurs

Business information bulletin No. 1 for women entrepreneurs was developed and published, consolidating information on the business environment, financing opportunities, and market trends. This bulletin is designed to enhance the knowledge and skills of women entrepreneurs and support their decision-making.

Regular information and recommendations related to environmental awareness are prepared and distributed through internal and external channels to coincide with world environment observance days.

4.6 Public Communication

Public Communication

Sharing Information with “Nogoon Erel” (Green Quest) Newspaper

To raise public awareness of the Bank’s ESG-related activities, relevant information and updates were submitted to the “Green Quest” newspaper and published in its June edition. The publication highlighted the Bank’s ongoing efforts in sustainable finance, social responsibility, and environmentally friendly initiatives, helping to strengthen public understanding of ESG practices and their positive impact.



Governance

(GRI 2-9 – 2-21, GRI 205)



5. Governance



Bogd Bank values transparency, ethical banking operations, and responsible governance.

We are committed to enhancing financial transparency, integrating ESG principles into our operations, and supporting SMEs. Through digital transformation and sustainable financial solutions, we support innovation, inclusive development, and long-term economic growth.

5.1 Board of Directors (GRI 2-9)



L. Boldkhuyag
Board Chairman, Honored Economist of Mongolia

- Over 25 years of experience in Mongolia's financial markets; co-founder of the Bodi Corporation
- Has served as Board member and Chairman of a major Mongolian commercial bank
- Honorary Consul of the Kingdom of Sweden



G. Saruul
CEO, Board Member



J. Narantuya
Independent Board Member



Jan Torsten Daser
Board Member



R. Bayasgalan
Board Member



D. Molomjamts
Board Member



Roger Thomas Moyes
Independent Board Member



B. Oigonjargal
Board Member



Philippe Cahen
Independent Board Member

During the first half of 2025, a Board-level member was designated to be responsible for sustainability matters, and coordination arrangements for the implementation of related activities were established.

5.2 Management Team



G. Saruul
CEO, Board Member

- Over 20 years of experience in the financial sector
- Previously served as Deputy CEO of the Mongolian Stock Exchange
- Served as Director responsible for Asia, Russia, and the CIS region at APM Futures and Rosenthal Collins Group
- Previously served as Senior Banker at Mobium Mortgage Group



M. Altanbagana
Chief Business Banking Officer



M. Bat-Ulzii
Chief Financial Officer



B. Bilegt
Chief Corporate Banking Officer



M. Altanzurkh
Chief Information Technology Officer



Ch. Banchin
Chief Business Development Officer



O. Unurtsetseg
Chief Operations Officer



L. Khongorzul
Chief Risk Management Officer



E. Gan-Erdene
Chief Treasury Officer

5.3 Bogd Bank's Sustainability Policy and Implementation

Bogd Bank's Environmental, Social Responsibility, and Gender Equality Policy was approved in 2022, defining relevant responsibilities and principles. Through this policy, the Bank supports sustainable projects, services, and products, contributing to economic diversification and sustainable finance.

A system for managing environmental, social, and gender risks has also been established, with the ESG risk assessment and management procedures approved and updated in 2024.

Sustainability Working Group

The Bank maintains a working group that organizes ESG related activities annually, including representatives from every department and unit of the Bank. This arrangement ensures the coordinated implementation, monitoring, and systematic delivery of sustainability-related policies and activities across the organization. This regular organizational structure plays a crucial role in ensuring sustainability activities are implemented consistently and effectively throughout the organization.

Grievance Channel

A grievance channel has been added to the ToC section of the Bank's website, providing a mechanism for promptly receiving and responding to any information related to corruption, bribery, risks, or violations.

grievance@bogdbank.com

Anti-Corruption and Anti-Bribery Policy

In 2025, the Bank adopted an Anti-Corruption and Anti-Bribery Policy. The purpose of this policy is to uphold the business and employee ethics of the Bank, promote integrity, transparency, and the protection of the Bank's reputation, remain free from corruption and bribery, enhance open, accountable, and transparent conduct, observe anti-bribery principles in any business relationships with third parties, define employee actions and measures to be taken, and establish anti-corruption and anti-bribery principles and systems.

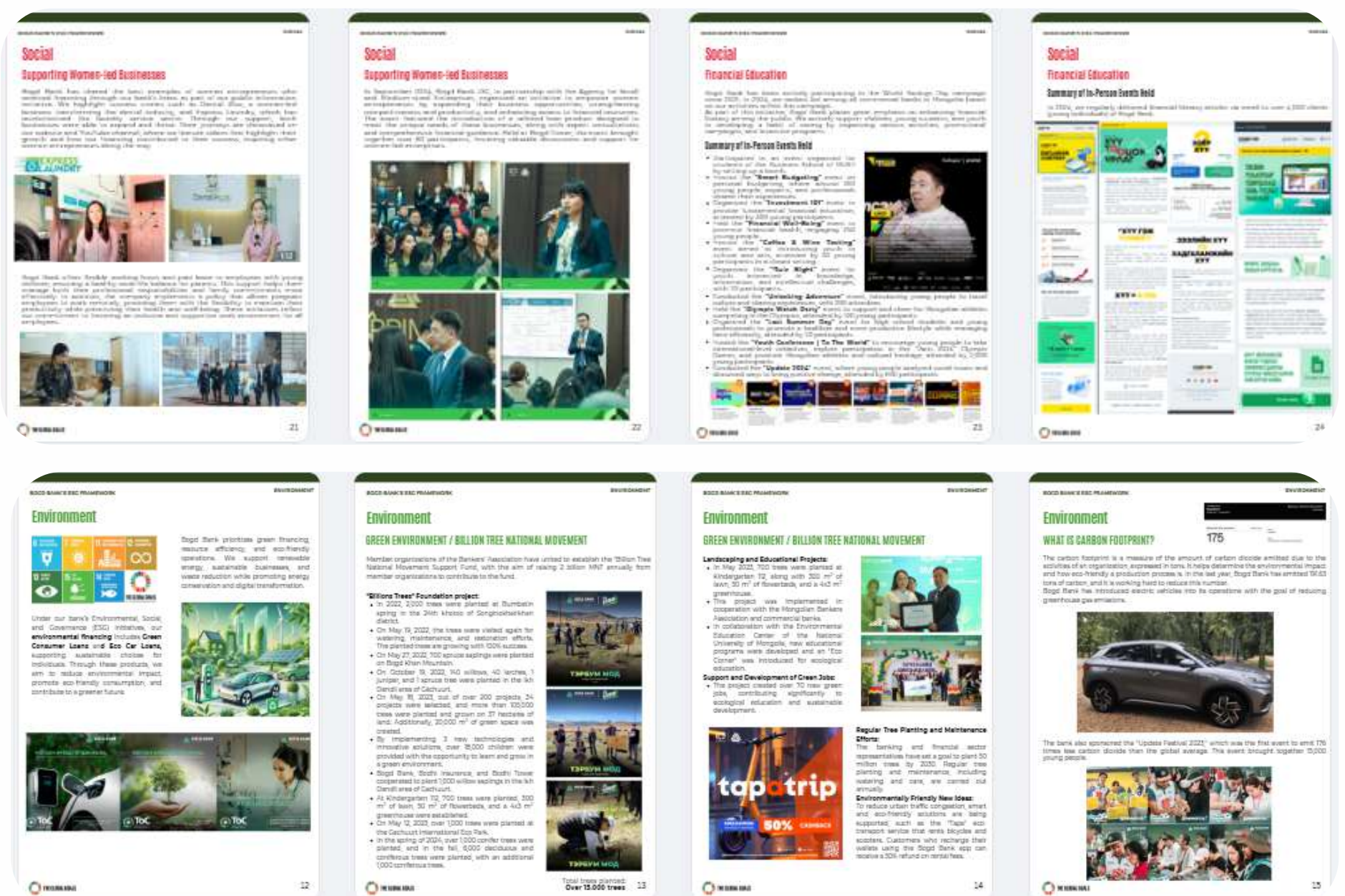
5.4 Transparency and Reporting

Regular ESG Reporting

ESG-related reports, forms, and information required by international financial institutions that have provided financing were submitted in a timely manner.

ESG Framework

The Bank's activities from 2022 to 2024 were consolidated and the ESG Framework was prepared in English for the first time.



2024 Sustainability Report

The 2024 Sustainability Report was prepared in English to present the Bank's sustainability policies and activities at the international level.



5.4 Transparency and Reporting

One Pager Prepared for the EU's GGBI Program

A concise one-pager was prepared for participation in the EU's GGBI program, providing a clear overview of the Bank's green and sustainable finance strategy, ESG initiatives, and long-term commitment to supporting environmentally and socially responsible development.

Credit Rating and Financial Stability

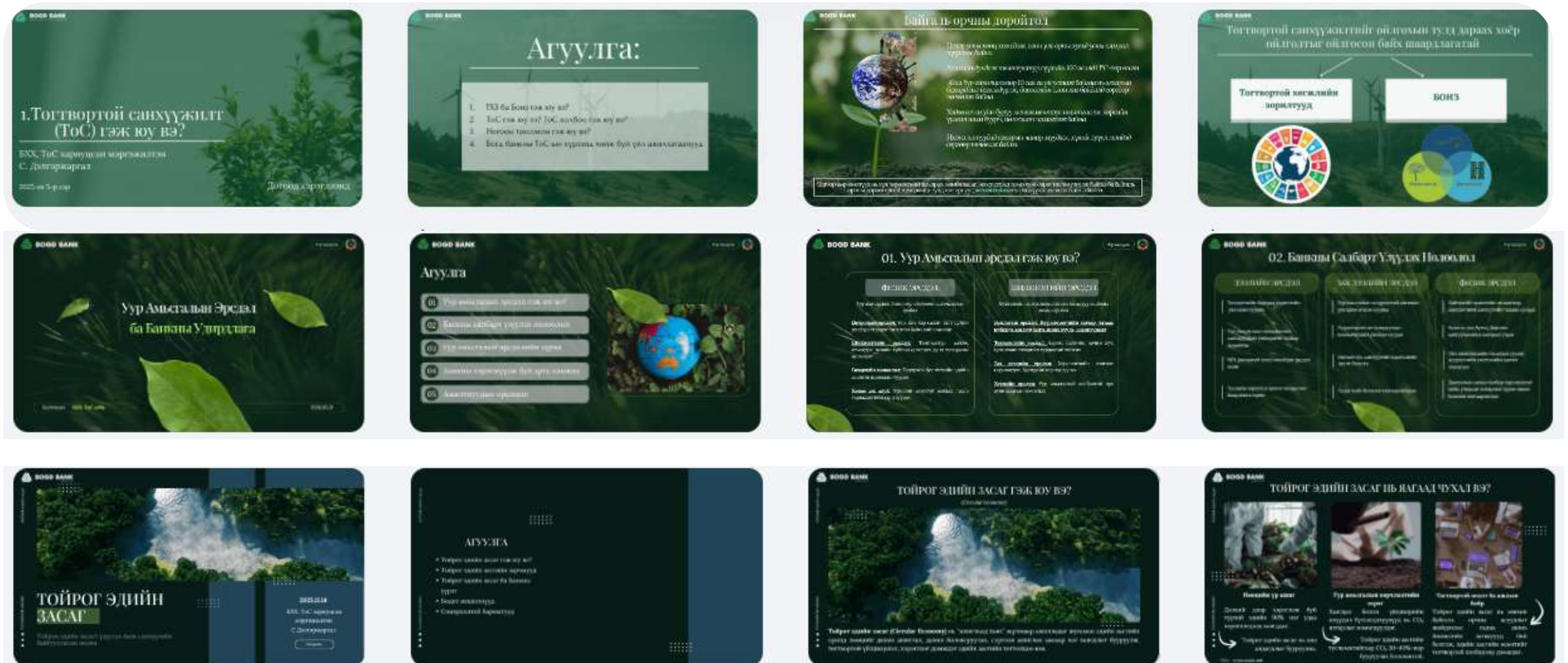
In 2025, following **Moody's** upgrade of Mongolia's sovereign credit rating to "B1/Stable," the credit ratings of 7 Mongolian banks improved, including Bogd Bank. The Bank's rating, which was **"B2/Stable"** in the previous year, was upgraded to "B1/Stable" in 2025. This improvement is expected to have a positive impact on attracting foreign investment, improving external financing conditions, and enhancing the accessibility and returns of the Bank's products.



5.5 Organizational Capacity Building

ESG Training Manual Developed

A training manual covering the fundamental concepts of sustainable development and ESG content was developed and distributed to employees.



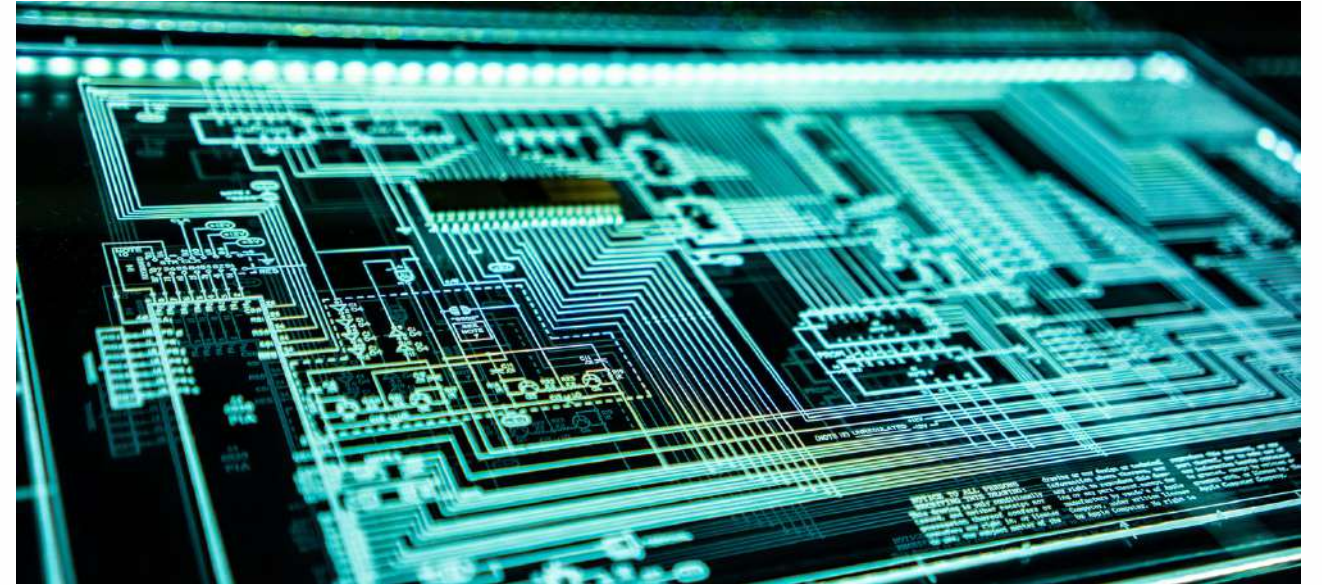
Employee Knowledge and Awareness Initiative

The Bank has begun preparing and distributing short informational posters to increase employee knowledge and awareness, and to cultivate sustainable consumption and green habits. This information contains recommendations and initiatives that employees can implement directly in their day-to-day activities, aimed at building internal culture and increasing sustainability awareness.



5.6 Information Security (GRI 418)

- The Bank's information security policy was updated.
- An information security audit was conducted pursuant to Article 17.1.7 of Mongolia's Cybersecurity Law.



- Implementation of the **PCI DSS (Payment Card Industry Data Security Standard)** was initiated.
- **PAM (Privileged Access Management)** and a Log server were newly introduced.
- Customer file digitization was increased, with 89.7% of customer files and 91.6% of loan files now digitized.

5.7 Risk Management (GRI 2-25)

- In 2025, the Risk Management Policy was improved to align with international standards, establishing an arrangement that encompasses business units in the first line of defense and risk and compliance units in the second line.
- Work on automating **IFRS 9** was initiated.
- Under continuous auditing, verification is conducted across a total of 58 criteria, with an additional 12 criteria newly added, improving the effectiveness of monitoring and verification.



6. GRI Context Index

This report was prepared in accordance with GRI (Global Reporting Initiative) standards. The table below shows how the information in the report aligns with GRI indicators and identifies indicators currently being developed.

GRI 2 – General Disclosures

GRI Standard	Disclosure/Requirement	Included in Report	Page/Section
GRI 2-1	Organizational details	Yes	Section 1.1
GRI 2-2	Reporting Scope	Yes	Page 5
GRI 2-3	Reporting period, frequency	Yes	Page 5
GRI 2-6	Description of Operations	Yes	Section 1.1
GRI 2-9	Board of Directors Structure	Yes	Section 5.1
GRI 2-22	Sustainability Strategy Statement	Yes	Section 2.1
GRI 2-23	Policies and Commitments	Yes	Section 5.3
GRI 2-25	Remediation Process for Negative Impacts	Partially	Section 5.6
GRI 2-29	Stakeholder Engagement	Yes	Section 1.3

GRI 3 – Material Topics

GRI Standard	Disclosure/Requirement	Included in Report	Page/Section
GRI 3-1	Process to determine material topics	Partially	Section 2.2
GRI 3-2	List of material topics	Yes	Section 2.2

GRI 200 – Economic

GRI Standard	Disclosure/Requirement	Included in Report	Page/Section
GRI 201-1	Direct economic value generated a	Partially	Section 4.5
GRI 205-2	Communication and training about anti-corruption policies	Yes	Section 5.3

GRI 300 - Environment

GRI Standard	Disclosure/Requirement	Included in Report	Page/Section
GRI 301-1	Materials used by weight or volume	Partially	Section 3.3 (paper, printer)
GRI 303-1	Water withdrawal	Partially	Section 3.3 (awareness raising)
GRI 305-1	Scope 1 GHG emissions	Yes	Section 3.1 (~7.3 tonnes CO ₂)
GRI 305-2	Scope 2 GHG emissions	Yes	Section 3.1 (~370.4 tonnes CO ₂)
GRI 305-3	Scope 3 GHG emissions	No	To be added in the future
GRI 306-1	Waste generation	Partially	Section 3.3

GRI 400 - Нийгэм

GRI Standard	Disclosure/Requirement	Included in Report	Page/Section
GRI 401-1	Human Resource	Yes	Section 4.1 (new hires 41%)
GRI 403-1	Occupational health and safety management system	Partially	Section 4.3
GRI 404-1	Average hours of training	Yes	Section 4.1
GRI 405-1	Diversity within the Management Team	Yes	Sections 4.1, 5.2
GRI 417-1	Product Information	Partially	Sections 4.4, 4.5
GRI 418-1	Client Data Breach	Partially	Section 5.6

GRI FS - Санхүүгийн үйлчилгээний салбарын тусгай ҮЗҮҮЛЭЛТҮҮД

GRI Standard	Disclosure/Requirement	Included in Report	Page/Section
GRI FS7	Volume of Social Impact Products	Yes	Sections 4.4, 4.5
GRI FS8	Environmentally Beneficial Products	Yes	Section 4.5
GRI FS13	Inclusion of Financially Underserved	Yes	Section 4.4
GRI FS14	Financial Accessibility for Persons with Special Needs	Partially	Section 4.4



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