

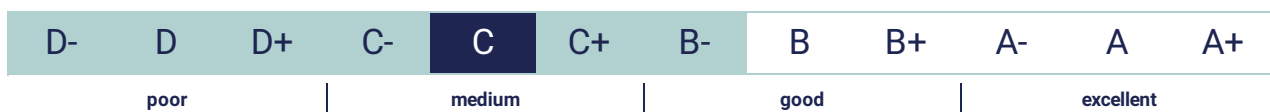
ESG Corporate Rating

Oberösterreichische Landesbank AG

Industry	Financials/Public & Regional Banks	Status	Prime
Country	Austria	Rating	C
ISIN	XS1509009483	Prime Threshold	C
		Decile Rank	1

RATED BY **Prime**

Absolute Rating



The assessment of a company's sustainability performance is based on approximately 100 criteria, selected specifically for each industry. A company's failure to disclose, or lack of transparency, regarding these matters will impact a company's rating negatively

Decile Rank



Low relative performance

High relative performance

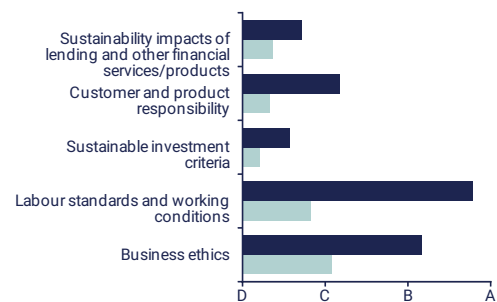
Indicates decile rank relative to industry group. A decile rank of 1 indicates a high relative ESG performance, while a 10 indicates a lower relative ESG performance.

Industry Leaders

Company name (in alphabetical order)	Country	Grade
Deutsche Kreditbank AG	DE	B-
La Banque Postale S.A.	FR	B-
Landesbank Baden-Württemberg	DE	C+

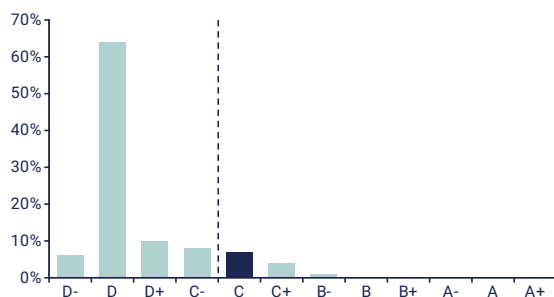
Legend: ■ Industry ■ Company --- Prime

Key Issue Performance

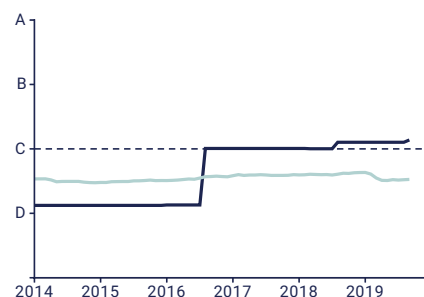


Distribution of Ratings

200 companies in the industry



Rating History



Oberösterreichische Landesbank AG

Analyst Opinion

Annette Gregori
Sector specialist



Sustainability Opportunities

As Oberösterreichische Landesbank (Hypo Oberösterreich) provides banking and insurance services to different client groups. Its main opportunities are the provision of financial services with social and environmental benefits as well as the provision of equal access to financial services. The company offers several financial services with a high social benefit, with a specific focus on the financing of social housing as well as services for charity organisations. The company further offers socially responsible investment products that use both an exclusionary screen and a best-in-class approach. Finally, the company offers a basic bank account subject to moderate terms and conditions, accessible banking services for clients with disabilities and provides green loan products to its clients. However, the named products and services could be expanded both in volume and scope.

Sustainability Risks

The financial sector's main sustainability risks concern the integration of environmental and social aspects into its lending and investment business. Lending-related risks are limited as the company is not significantly involved in international project finance or in potential controversial sectors (such as oil and gas, or resource extraction). Hypo Oberösterreich considers some social and environmental criteria in its lending business, such as client-related requirements on resource efficiency or community health and safety. With regard to responsible client relations, Hypo Oberösterreich has taken reasonable steps to ensure responsible marketing and tax compliance by clients. However, the company fails to present a comprehensive strategy to adequately manage further relevant risks related to its asset management activities. The company has taken good measures with regard to the management of employee-related issues. In addition, as all employees work in Austria, they benefit from high legal employment standards on e.g. employment security. Finally, business ethics risks appear to be comparably well-managed through the implementation of a comprehensive code of conduct supported by several compliance measures, such as extensive compliance training.

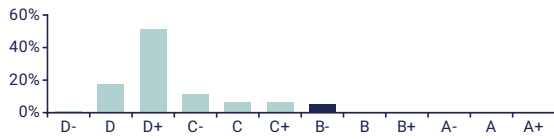
Governance Opinion

Two of Hypo Oberösterreich's shareholders own more than 20% of share capital: the Land of Upper Austria (50.57%) and Raiffeisenlandesbank Oberösterreich (via Hypo Holding GmbH) (38.57%) (as at December 2018). The company's governance structure is to some extent designed to ensure separation of managerial and supervisory functions as the chairman of the board is considered independent. Yet, there is no majority of independent members on the supervisory board. Likewise, independent board members are not in the majority on the company's board committees in charge of audit and remuneration; only the nomination committee can be considered predominantly independent (as at September 2019). The company discloses the remuneration policy for its executives. It apparently does not include long-term incentive components, which could otherwise incentivize sustainable value creation.

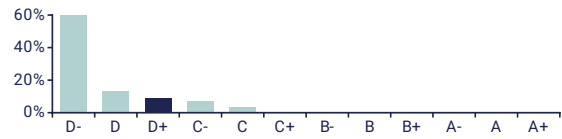
There is no indication of an independent board committee in charge of a sustainability strategy and it seems that ESG targets are not a part of the remuneration system for the company's executive management team. Business ethics risks appear to be comparably well-managed through the implementation of a comprehensive code of conduct covering almost all relevant issues, including corruption. The code is supported by several compliance measures such as comprehensive compliance training.

Oberösterreichische Landesbank AG

A. Social and Governance Rating **50.0%** | **B-**
 Weight Rating

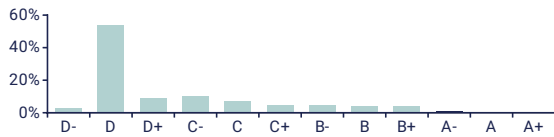


B. Environmental Rating **50.0%** | **D+**
 Weight Rating



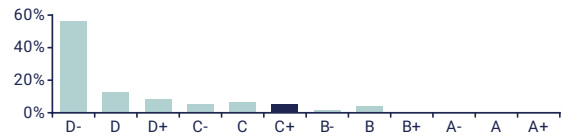
A.1. Staff and Suppliers **15.0%** | **A-**
 Weight Rating

- staff
- freedom of association
- equal opportunities
- health and safety
- work-life balance
- employment security
- training and education
- suppliers



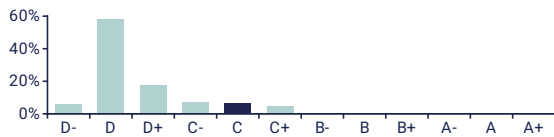
B.1. Environmental Management **7.5%** | **C+**
 Weight Rating

- environmental management system
- climate change strategy
- travel and transport
- green procurement



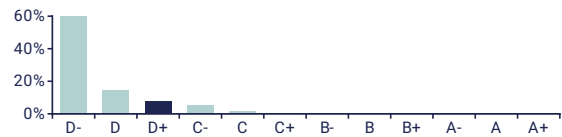
A.2. Society and Product Responsibility **25.0%** | **C**
 Weight Rating

- society
- human rights
- community
- gov. relations/influence on publ. pol.
- stakeholder dialogue
- customer and product responsibility
- social impact of prod. and services
- social aspects along the value chain



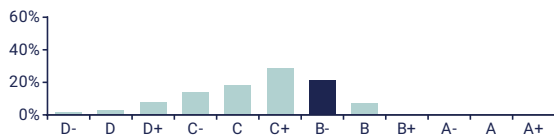
B.2. Products and Services **40.0%** | **D+**
 Weight Rating

- env. impact of products and services
- env. aspects along the value chain
- climate impact of the corp. value chain
- lending / investment banking business
- asset management / own investments



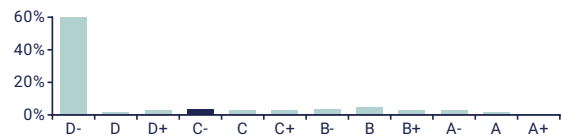
A.3. Corporate Governance and Business Ethics **10.0%** | **B-**
 Weight Rating

- corporate governance
- board independence
- shareholder democracy
- executive compensation
- shareholder structure
- business ethics



B.3. Eco-efficiency **2.5%** | **C-**
 Weight Rating

- energy intensity
- GHG emission intensity
- freshwater intensity
- paper use intensity



Oberösterreichische Landesbank AG

Controversial Business Practices

	Risk Exposure (○ no / ⊗ yes)	Potential Controversy	Moderate Controversy	Severe Controversy	Very Severe Controversy	Comments
Human Rights Controversies	○	0	0	0	0	
Company		0	0	0	0	
Supplier		0	0	0	0	
Financiers		0	0	0	0	
Labour Rights Controversies	○	0	0	0	0	
Company: Freedom of association		0	0	0	0	
Company: Forced labour		0	0	0	0	
Company: Child labour		0	0	0	0	
Company: Discrimination		0	0	0	0	
Company: Other areas		0	0	0	0	
Supplier: Freedom of association		0	0	0	0	
Supplier: Forced labour		0	0	0	0	
Supplier: Child labour		0	0	0	0	
Supplier: Discrimination		0	0	0	0	
Supplier: Other areas		0	0	0	0	

Oberösterreichische Landesbank AG

Controversial Business Practices

	Risk Exposure (○ no / ⊗ yes)	Potential Controversy	Moderate Controversy	Severe Controversy	Very Severe Controversy	Comments
Controversial Environmental Practices	⊗	0	0	0	0	Risk of financing activities with a negative environmental impact.
Company		0	0	0	0	
Supplier		0	0	0	0	
Financier		0	0	0	0	
Business Malpractice	○	0	0	0	0	
Company: Corruption		0	0	0	0	
Company: Financial accounting		0	0	0	0	
Company: Competition		0	0	0	0	
Company: Taxes		0	0	0	0	
Company: Money transfers		0	0	0	0	
Company: Other/Miscellaneous		0	0	0	0	

Oberösterreichische Landesbank AG

Additional Company Information

Company Profile

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Oberösterreichische Landesbank AG provides various banking products and services in Austria. It offers accounts and cards; savings products; investment products and services; financing; and insurance products and services. The company also provides securities products and services, such as shares, bonds, funds, warrants, certificates, and currencies, as well as real estate services. It offers its products and services for private and business customers, and public institutions, as well as doctors and freelance professionals, and churches and social organizations. The company was founded in 1891 and is headquartered in Linz, Austria. Oberösterreichische Landesbank AG is a subsidiary of Land Oberösterreich, Linz.

Oberösterreichische Landesbank AG

Methodology - Overview

The ESG Corporate Rating methodology was originally developed by oekom research and has been consistently updated for more than 25 years.

ESG Corporate Rating - The ESG Corporate Rating universe, which is currently expanding from more than 8,000 corporate issuers to a targeted 10,000 issuers in 2020, covers important national and international indices as well as additional companies from sectors with direct links to sustainability and the most important bond issuers that are not publicly listed companies.

The assessment of a company's social & governance and environmental performance is based on approximately 100 environmental, social and governance indicators per sector, selected from a pool of 800+ proprietary indicators. All indicators are evaluated independently based on clearly defined performance expectations and the results are aggregated, taking into account each indicator's and each topic's materiality-oriented weight, to yield an overall score (rating). If no relevant or up-to-date company information with regard to a certain indicator is available, and no assumptions can be made based on predefined standards and expertise, e.g. known and already classified country standards, the indicator is assessed with a D-.

In order to obtain a comprehensive and balanced picture of each company, our analysts assess relevant information reported or directly provided by the company as well as information from reputable independent sources. In addition, our analysts actively seek a dialogue with the assessed companies during the rating process and companies are regularly given the opportunity to comment on the results and provide additional information.

Analyst Opinion - Qualitative summary and explanation of the central rating results in three dimensions:

- (1) Opportunities - assessment of the quality and the current and future share of sales of a company's products and services, which positively or negatively contribute to the management of principal sustainability challenges.
- (2) Risks - summary assessment of how proactively and successfully the company addresses specific sustainability challenges found in its business activity and value chain, thus reducing its individual risks, in particular regarding its sector's key issues.
- (3) Governance - overview of the company's governance structures and measures as well as of the quality and efficacy of policies regarding its ethical business conduct.

Controversial Business Practices - The assessment of companies' sustainability performance in the ESG Corporate Rating is informed by a systematic and comprehensive evaluation of companies' ability to prevent and mitigate ESG controversies. ISS ESG conducts research and analysis on corporate involvement in verified or alleged failures to respect recognized standards for responsible business conduct through Norm-Based Research.

Norm-Based Research is based on authoritative standards for responsible business conduct such as the UN Global Compact, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles for Business and Human Rights and the Sustainable Development Goals.

As a stress-test of corporate disclosure, Norm-Based Research assesses the following:

- Companies' ability to address grievances and remediate negative impacts
- Degree of verification of allegations and claims
- Severity of impact on people and the environment, and systematic or systemic nature of malpractices

Severity of impact is categorized as Potential, Moderate, Severe, Very severe. This informs the ESG Corporate Rating.

Decile Rank - The Decile Rank indicates in which decile (tenth part of total) the individual Corporate Rating ranks within its industry from 1 (best – company's rating is in the first decile within its industry) to 10 (lowest – company's rating is in the tenth decile within its industry). The Decile Rank is determined based on the underlying numerical score of the rating. If the total number of companies within an industry cannot be evenly divided by ten, the surplus company ratings are distributed from the top (1 decile) to the bottom. If there are Corporate Ratings with identical absolute scores that span a division in decile ranks, all ratings with an equal decile score are classified in the higher decile, resulting in a smaller number of Corporate Ratings in the decile below.

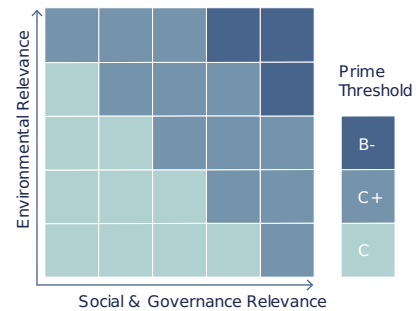
Distribution of Ratings - Overview of the distribution of the ratings of all companies from the respective industry that are included in the ESG Corporate Rating universe (company portrayed in this report: dark blue).

Oberösterreichische Landesbank AG

Methodology - Overview

Industry Classification - The social and environmental impacts of industries differ. Therefore, based on its relevance, each industry analyzed is classified in a Sustainability Matrix.

Depending on this classification, the two dimensions of the ESG Corporate Rating, the Social Rating and the Environmental Rating, are weighted and the sector-specific minimum requirements for the ISS ESG Prime Status (Prime threshold) are defined (absolute best-in-class approach).



Industry Leaders - List (in alphabetical order) of the top three companies in an industry from the ESG Corporate Rating universe at the time of generation of this report.

Key Issue Performance - Overview of the company's performance with regard to the key social and environmental issues in the industry, compared to the industry average.

Major Shareholders & Ownership Summary - Overview of the company's major shareholders at the time of generation of this report. All data as well as the categorisation system for the investor types is based on information from S&P Capital IQ.

Rating History - Development of the company's rating over time and comparison to the average rating in the industry.

Rating Scale - Companies are rated on a twelve-point scale from A+ to D-:

A+: the company shows excellent performance.

D-: the company shows poor performance (or fails to demonstrate any commitment to appropriately address the topic).

Overview of the range of scores achieved in the industry (light blue) and indication of the grade of the company evaluated in this report (dark blue).

Sources of Information - A selection of sources used for this report is illustrated in the annex.

Status & Prime Threshold - Companies are categorized as Prime if they achieve/exceed the sustainability performance requirements (Prime threshold) defined by ISS ESG for a specific industry (absolute best-in-class approach) in the ESG Corporate Rating. Prime companies are sustainability leaders in their industry and are better positioned to cope with material ESG challenges and risks, as well as to seize opportunities, than their Not Prime peers. The financial materiality of the Prime Status has been confirmed by performance studies, showing a continuous outperformance of the Prime portfolio when compared to conventional indices over more than 14 years.

Oberösterreichische Landesbank AG

	Weight	Grade
A. Social and Governance Rating	50.0%	B-
A.1. Staff and Suppliers	15.0%	A-
A.1.1. Staff	13.5%	A
A.1.1.1. Freedom of association and the right to collective bargaining	2.0%	B+
A.1.1.1.1. Policy on freedom of association and collective bargaining	0.7%	B
<p>The company (almost) exclusively operates in countries with high legal and/or factual standards on freedom of association and the right to collective bargaining. No or only limited information is available on a company commitment ensuring freedom of association and the right to collective bargaining.</p> <p>Formality: Not applicable for evaluations based on high legal and/or factual country standards.</p> <p>Coverage: 100% of employees.</p>		
A.1.1.1.2. Measures to ensure freedom of association and facilitate collective bargaining	1.4%	B+
<p>a. Communication of rights: The right to associate freely and bargain collectively is communicated actively on the local level (e.g. through staff trainings).</p> <p>Coverage: 100% of employees.</p> <p>b. Grievance procedures: No or only very limited information is available on confidential channels (e.g. hotlines or ombudsperson), communication of procedures to employees and regular progress reports regarding individual grievance cases. However, collective bargaining agreements are implemented and/or the company cooperates with trade unions. Thus, it is assumed that grievance procedures are in place.</p> <p>Coverage: 100% of employees.</p> <p>c. Measures in countries with severe legal/factual limitations:</p> <p>i. Alternative worker participation in countries with severe legal limitations: Not applicable as the company is not active in countries with severe legal limitations to freedom of association and collective bargaining.</p> <p>Coverage: Not applicable as the company is not active in countries with severe legal limitations to freedom of association and collective bargaining.</p> <p>ii. Anti-union discrimination measures in countries with severe factual limitations: Not applicable as the company is not active in countries with severe factual limitations to freedom of association and collective bargaining.</p> <p>Coverage: Not applicable as the company is not active in countries with severe factual limitations to freedom of association and collective bargaining.</p>		
A.1.1.1.3. Controversies relating to freedom of association	0.0%	x
<p>Research did not reveal relevant controversies in recent years.</p>		
A.1.1.2. Equal opportunities and non-discrimination	2.0%	B-
A.1.1.2.1. Policy on non-discrimination	0.7%	B
<p>a. Prohibited grounds of discrimination: The company prohibits and/or will not tolerate discrimination on the grounds of various personal characteristics such as age, religion, race, ethnic origin, disability, gender, social origin and sexual orientation. Some relevant characteristics such as family status are not explicitly covered.</p> <p>b. Relevant aspects of employment: The company (almost) exclusively operates in countries with high legal and/or factual standards on non-discrimination. No or only limited information is available on a company commitment on non-discrimination in different aspects of employment such as recruitment, job assignment, promotion, remuneration, training and benefits.</p> <p>c. Prohibition of harassment and abusive behaviour: The company refers to the prohibition and/or non-tolerance of harassment and/or abusive behaviour in general terms.</p> <p>Formality: All commitments are formal.</p> <p>Coverage: 100% of employees.</p>		
A.1.1.2.2. Measures to promote equal opportunities and diversity	0.7%	D+
<p>Single measures to promote equal opportunities and diversity are implemented. In general, relevant measures include clear assignment of responsibilities, strategic targets, action plans and/or programmes, trainings, grievance procedures, and audits and evaluations.</p> <p>Coverage: 100% of employees.</p>		

Oberösterreichische Landesbank AG

	Weight	Grade	
A.1.1.2.3. Gender distribution	0.7%	B+	
a. Proportional representation of women in management:			
	2018		
Percentage of women in the overall workforce	58%		
Percentage of women in management positions	22%		
Coverage: 100% of employees.			
b. Gender parity in the executive management team:			
	2019		
Percentage of women in the executive management team	33.3%		
As at:	2019-07-18		
A.1.1.2.4. Controversies relating to discrimination	0.0%	x	
Research did not reveal relevant controversies in recent years.			
A.1.1.3. Health and safety	2.7%	A	
A.1.1.3.1. Health and safety management system	1.4%	A+	
A.1.1.3.1.1. Implementation of a health and safety management system	1.4%	A+	
Relevant elements implemented by the company:	Yes	No	No information / Not applicable
Formal health and safety policy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Structure and responsibilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Targets and objectives	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Programmes to achieve targets	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Training and awareness-raising	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Data compilation system	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Emergency response	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Audits	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Coverage: 100% of employees.			
A.1.1.3.1.2. Certification of the health and safety management system to an international standard	0.0%	x	
Not applicable for small and medium sized enterprises with less than 500 employees.			
A.1.1.3.2. Mental health management	1.4%	A-	
a. Prevention of mental health problems: Various measures to prevent mental health problems are implemented. In general, relevant measures include identification of risk factors in operations, monitoring of mental health, awareness-raising on risk factors and mental health issues, and concrete prevention activities (e.g. stress management courses, general adjustments regarding work load and availability, adapting organisational structure and culture).			
Coverage: 100% of employees.			
b. Alleviation of mental health problems: The company provides psychological support and adjusts work load, content and hours for affected employees. No or only very limited information is available on return-to-work programmes.			
Coverage: 100% of relevant employees.			
A.1.1.3.3. Controversies relating to health and safety	0.0%	x	
Research did not reveal relevant controversies in recent years.			

Oberösterreichische Landesbank AG

	Weight	Grade
A.1.1.4. Work-life balance	2.7%	A+
A.1.1.4.1. Workplace flexibility and working time reduction	1.4%	A+
<p>a. Workplace flexibility: The company offers flexibility with respect to daily working hours (flexi-time) as well as variable work schedules that allow for the flexible distribution of working hours over longer periods. No or only very limited information is available on telecommuting options.</p> <p>b. Working time reduction: The company offers its employees several alternatives to full-time work schedules.</p> <p>Coverage: 100% of relevant employees.</p>		
A.1.1.4.2. Dependant care and special leave	1.4%	A+
<p>a. Support for dependant care: The company supports access to childcare facilities (on-site or in cooperation with nearby facilities) and/or offers direct financial support. No or only very limited information is available on additional support such as emergency care or elderly care referral services.</p> <p>b. Special leave: The company offers long-term and short-term leave options for education, family or personal reasons, including maternity/paternity leave beyond legal requirements and/or elderly care leave.</p> <p>Coverage: 100% of relevant employees.</p>		
A.1.1.5. Employment security and types of employment	2.7%	A+
A.1.1.5.1. Employment security and responsible workforce restructuring	1.8%	A+
A.1.1.5.1.1. Policy on employment security and responsible workforce restructuring	0.0%	x
<p>Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>Formality: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>Coverage: Not applicable for small and medium sized enterprises with less than 500 employees.</p>		
A.1.1.5.1.2. Large-scale redundancies and significant job cuts	1.8%	A+
<p>According to the company, there have been no large-scale redundancies or significant job cuts affecting more than 1,000 employees or more than 5% of the total workforce in recent years.</p>		
A.1.1.5.1.3. Measures to ensure responsible workforce restructuring	0.0%	x
<p>a. Avoidance of compulsory redundancies: Not applicable for companies without large-scale redundancies or significant job cuts among direct employees in recent years.</p> <p>Coverage: Not applicable for companies without large-scale redundancies or significant job cuts among direct employees in recent years.</p> <p>b. Assistance for employees affected by compulsory redundancies: Not applicable for companies without large-scale redundancies or significant job cuts among direct employees in recent years.</p> <p>Coverage: Not applicable for companies without large-scale redundancies or significant job cuts among direct employees in recent years.</p> <p>c. Responsible redundancy procedures: Not applicable for companies without large-scale redundancies or significant job cuts among direct employees in recent years.</p> <p>Coverage: Not applicable for companies without large-scale redundancies or significant job cuts among direct employees in recent years.</p>		
A.1.1.5.2. Types of employment	0.9%	A+
A.1.1.5.2.1. Position on non-regular employment	0.0%	x
<p>Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>Coverage: Not applicable for small and medium sized enterprises with less than 500 employees.</p>		
A.1.1.5.2.2. Disclosure of different types of employment	0.9%	A+
<p>a. Ratio of permanent to temporary contracts: The company discloses the ratio of permanent to temporary contracts.</p>		
	2018	
Percentage of employees with a permanent contract	100%	
Percentage of employees with a temporary contract	0%	

Oberösterreichische Landesbank AG

Weight Grade

Coverage: 100% of employees.

b. Not directly employed workforce:

i. Ratio of directly employed to not directly employed workforce: The company discloses the ratio of directly to externally and not directly employed workforce (e.g. on-site contractors, temp agency workers, consultants and freelancers).

	2018
Percentage of directly employed workforce	100%
Percentage of not directly employed workforce	0%

Coverage: 100% of the workforce.

ii. Types of not directly employed workforce: Not applicable as the entire workforce of the company is directly employed.

A.1.1.6. Training and education 1.4% A+

A.1.1.6.1. Strategic training management 1.4% A+

a. Needs analysis: The company identifies strategic training needs.

b. Individual training plans: The company designs individual training plans together with employees.

c. Training targets: Not applicable for small and medium sized enterprises with less than 500 employees.

d. Training evaluation and follow-up: Not applicable for small and medium sized enterprises with less than 500 employees.

Coverage: 100% of employees.

A.1.1.6.2. Disclosure of average training time/expenses per employee by employee category 0.0% x

Not applicable for small and medium sized enterprises with less than 500 employees.

Coverage: Not applicable for small and medium sized enterprises with less than 500 employees.

A.1.1.7. Additional controversies relating to staff issues 0.0% x

Research did not reveal relevant controversies in recent years.

A.1.2. Suppliers 1.5% D-

A.1.2.1. Supplier standard with regard to labour rights and working conditions 0.8% D-

a. Content of supplier standard:

i. Child labour: No or only very limited information is available on a supplier standard covering the prohibition of child labour in accordance with the ILO Minimum Age Convention.

ii. Forced labour: No or only very limited information is available on a supplier standard covering the prohibition of forced labour in detail or referring to the ILO Forced Labour Convention (No. 29) and the Abolition of Forced Labour Convention (No. 105).

iii. Freedom of association: No or only very limited information is available on a supplier standard covering freedom of association and collective bargaining, including a requirement to establish means to facilitate these rights in situations where they are restricted under law (e.g. works councils).

iv. Discrimination: No or only very limited information is available on a supplier standard covering the prohibition of discrimination with regard to grounds of discrimination (e.g. age, gender and ethnic origin) and aspects of employment (e.g. recruitment, promotion and remuneration).

v. Health and safety: No or only very limited information is available on a supplier standard covering health and safety.

vi. Wages: No or only very limited information is available on a supplier standard covering wages.

vii. Working time: No or only very limited information is available on a supplier standard covering working time in accordance with internationally recognised minimum standards of 48 regular hours of work per week, a rest period of at least 24 hours every seven days and maximum of 12 hours of voluntary overtime per week.

viii. Harassment and abusive behaviour: No or only very limited information is available on a supplier standard covering the prohibition of harassment and abusive behaviour.

b. Bindingness of supplier standard: No or only very limited information is available on a supplier standard whose wording is binding that has to be signed by suppliers.

c. Inclusion of extended supply chain: No or only very limited information is available on a supplier standard which requires suppliers to extend the standard further down their supply chain.

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	Weight	Grade
Coverage: The percentage of suppliers covered is considered if sufficient content-related information is available to assess the indicator.		
A.1.2.2. Procedures to ensure compliance with the supplier standard on labour rights and working conditions	0.8%	D-
<p>a. Supplier risk assessments: No or only very limited information is available on supplier risk assessments.</p> <p>b. Supplier audits: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>c. Facilitation of non-compliance reporting: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>d. Procedures in case of non-compliance: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>e. Training of employees in purchasing departments: No or only very limited information is available on training of employees in purchasing departments on the company's supplier standard on labour rights and working conditions.</p>		
Coverage: The percentage of relevant operations covered is considered if sufficient content-related information is available to assess the indicator.		
A.1.2.3. Social controversies relating to supplier activities	0.0%	x
Research did not reveal relevant controversies in recent years.		
A.2. Society and Product Responsibility	25.0%	C
A.2.1. Society	6.3%	C-
A.2.1.1. Human rights	3.1%	D+
A.2.1.1.1. Human rights policies and standards	1.0%	B
A.2.1.1.1.1. Policy on human rights	1.0%	B
<p>a. Respect for internationally recognised human rights: The company is committed to respecting internationally recognised human rights. However, there is no commitment to ensure that the company is not complicit in their violation.</p> <p>Formality: (Almost) all commitments are formal.</p> <p>Coverage: 100% of relevant activities.</p>		
A.2.1.1.2. Human rights due diligence procedures	2.1%	D-
<p>a. General procedures</p> <p>i. Human rights risk and impact assessment: No information is available on whether the company assesses its potential and actual impacts on human rights on a regular basis.</p> <p>Coverage: The percentage of relevant activities covered is considered if sufficient content-related information is available to assess the indicator.</p>		
A.2.1.1.3. Controversies relating to human rights	0.0%	x
Research did not reveal relevant controversies in recent years.		
A.2.1.2. Community	0.0%	x
A.2.1.2.1. Community involvement	0.0%	x
<p>a. Objectives of community activities: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>b. Community involvement programmes: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>c. Monitoring and evaluation of community projects: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>d. Disclosure of community spending: Not applicable for small and medium sized enterprises with less than 500 employees.</p>		
A.2.1.3. Relations with governments and influence on public policy	0.0%	x
A.2.1.3.1. Financial relations with governments	0.0%	x
A.2.1.3.1.1. Tax base erosion and profit shifting	0.0%	x
<p>a. Transfer pricing: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>Coverage: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>b. Presence in jurisdictions enabling tax base erosion and profit shifting:</p>		

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	Weight	Grade
<p>i. Position on presence in jurisdictions enabling tax base erosion and profit shifting: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>Coverage: Not applicable for small and medium sized enterprises with less than 500 employees.</p>		
A.2.1.3.1.2. Payments to governments and economic activity	0.0%	x
A.2.1.3.1.2.1. Public disclosure of payments to government	0.0%	x
<p>a. Payments by country: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>b. Types of payments: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>Coverage: Not applicable for small and medium sized enterprises with less than 500 employees.</p>		
A.2.1.3.1.2.2. Public disclosure of economic activity	0.0%	x
<p>a. Employees by country: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>Coverage: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>b. Revenues by country: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>Coverage: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>c. Profits by country: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>Coverage: Not applicable for small and medium sized enterprises with less than 500 employees.</p>		
A.2.1.3.1.3. Public disclosure of financial assistance received from governments	0.0%	x
<p>a. Financial assistance by country: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>b. Types of financial assistance: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>Coverage: Not applicable for small and medium sized enterprises with less than 500 employees.</p>		
A.2.1.3.1.4. Controversies relating to financial relations with governments	0.0%	x
<p>Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>Not applicable for small and medium sized enterprises with less than 500 employees.</p>		
A.2.1.3.2. Political contributions	0.0%	x
<p>a. Policy on political contributions: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>Formality: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>Coverage: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>b. Political contributions made: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>c. Public disclosure of political contributions and recipients: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>Coverage: Not applicable for small and medium sized enterprises with less than 500 employees.</p>		
A.2.1.3.3. Transparency on participation in public policy making and lobbying activities	0.0%	x
<p>a. Lobbying expenditures: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>b. Channels used for lobbying purposes: Not applicable for small and medium sized enterprises with less than 500 employees.</p> <p>c. Lobbying positions: Not applicable for small and medium sized enterprises with less than 500 employees.</p>		
A.2.1.4. Stakeholder dialogue	3.1%	C-
A.2.1.4.1. Sustainability reporting	3.1%	C-
<p>a. Reporting topics: Reporting covers some sustainability issues such as staff related topics, supply chain management, society, business ethics, customer and product responsibility, environmental management as well as industry-specific environmental and social impacts in varying degrees of detail.</p> <p>b. Reporting quality: The quality of the company's sustainability reporting in terms of balance, comparability, accuracy, timeliness and clarity is poor.</p> <p>c. Assurance of reporting:</p> <p>i. Level of assurance:</p>		

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	Weight	Grade
Not applicable / no information / no assurance	<input checked="" type="checkbox"/>	
Limited assurance	<input type="checkbox"/>	
Partly limited, partly reasonable assurance	<input type="checkbox"/>	
Reasonable assurance	<input type="checkbox"/>	
ii. Assurance scope:		
Not applicable / no information / no assurance	<input checked="" type="checkbox"/>	
Some material respects	<input type="checkbox"/>	
Various material respects	<input type="checkbox"/>	
All material respects	<input type="checkbox"/>	

Coverage: 100% of operations.

Comment: Assurance of reporting is not applicable for small and medium sized enterprises with less than 500 employees.

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	Weight	Grade
A.2.2. Customer and product responsibility	18.8%	C
A.2.2.1. Social impact of products and services	3.8%	C
A.2.2.1.1. Social impacts of the product portfolio	3.8%	C

	2018 Share of net sales (est.)
Products and services with an impact on the achievement of global social objectives	
Alleviating poverty:	
Contribution: no products or services with a direct and substantial impact	0%
Obstruction: no products or services with a direct and substantial impact	0%
Combating hunger and malnutrition:	
Contribution: no products or services with a direct and substantial impact	0%
Obstruction: no products or services with a direct and substantial impact	0%
Ensuring health:	
Contribution: no products or services with a direct and substantial impact	0%
Obstruction: no products or services with a direct and substantial impact	0%
Delivering education:	
Contribution: no products or services with a direct and substantial impact	0%
Obstruction: no products or services with a direct and substantial impact	0%
Attaining gender equality:	
Contribution: no products or services with a direct and substantial impact	0%
Obstruction: no products or services with a direct and substantial impact	0%
Providing basic services:	
Contribution: social housing	14%
Obstruction: no products or services with a direct and substantial impact	0%
Safeguarding peace:	
Contribution: no products or services with a direct and substantial impact	0%
Obstruction: no products or services with a direct and substantial impact	0%
Other (Social):	
Contribution: no products or services with a direct and substantial impact	0%
Obstruction: no products or services with a direct and substantial impact	0%

Comment: For companies in the financial sector, the total business volume (including e.g. loan volume, assets under management, underwriting volume) is used as a reference value to calculate the percentages above.

The company's product portfolio includes single products/services with direct and substantial negative impacts on the achievement of global social objectives (e.g. it cannot be excluded that the company offers financial services for companies involved in the military sector). However, these constitute a negligible share (estimated < 1%) of the total business volume.

A.2.2.1.2. Strategy shift towards a more socially beneficial product portfolio	0.0%	x
Not applicable as the company does not exhibit a clear and substantial strategy to shift its portfolio towards socially (more) beneficial products and/or services.		

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	Weight	Grade	
A.2.2.2. Social aspects along the value chain	15.0%	C	
A.2.2.2.1. Responsible marketing	1.9%	C+	
A.2.2.2.1.1. Policy on responsible marketing	1.9%	C+	
<p>a. Basic commitments on responsible marketing: A commitment is available to marketing and product information that is comprehensive, accurate, not misleading, and balanced. No information is available on a commitment to marketing and product information that is easily understandable.</p> <p>b. Pricing: A general commitment is available to transparency regarding costs and/or conditions.</p> <p>c. Information on risks: A detailed commitment to transparency regarding product risks is available.</p> <p>d. Non-use of small print: No or only very limited information is available on a commitment to refrain from using small print.</p> <p>e. Rejection of customer applications: No information is available on a commitment to inform customers about the reasons leading to rejection of e.g. a loan or insurance application.</p> <p>f. Sponsoring of mega events: Not applicable as the company does not sponsor relevant mega events.</p> <p>Formality: Some commitments are formal.</p> <p>Coverage: 100% of relevant operations.</p>			
A.2.2.2.1.2. Controversies relating to responsible marketing	0.0%	x	
Research did not reveal relevant controversies in recent years.			
A.2.2.2.2. Data protection and information security	1.9%	C+	
A.2.2.2.2.1. Information security management system	1.9%	C+	
A.2.2.2.2.1.1. Implementation of an information security management system	1.3%	C+	
Relevant elements implemented by the company:	Yes	No	No information / Not applicable
Risk assessments	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Structure and responsibilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Targets and objectives	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Training and awareness-raising	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Physical and technical safeguards	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Information security incident management	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Audits	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Coverage: 100% of relevant operations.			
A.2.2.2.2.1.2. Certification of the information security management system to an international standard	0.0%	x	
Not applicable for small and medium sized enterprises with less than 500 employees.			
A.2.2.2.2.1.3. Procedures to ensure information security in outsourced data processing	0.6%	C-	
<p>a. Due diligence in selection processes: The company implements some elements of third-party due diligence, such as risk assessments, checks on integrity, examination of track record, identification of red flags or definition of requirements such as ISO 27001 certification.</p> <p>b. Contract requirements: No or only very limited information is available on whether third-party data processors are required to implement adequate measures to ensure information security and on whether contracts require third-party data processors to extend the contract requirements to other third-party data processors (sixth-party risk).</p> <p>c. Monitoring and review: The company monitors and reviews third-party data processors. No detailed information (e.g. on frequency and methods) is available.</p> <p>Coverage: More than 80% of relevant operations (estimated).</p>			
A.2.2.2.2.2. Controversies relating to data protection and information security	0.0%	x	
Research did not reveal relevant controversies in recent years.			

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	Weight	Grade
A.2.2.2.3. Responsible sales practices	2.8%	D+
A.2.2.2.3.1. Measures to ensure responsible sales practices	2.8%	D+
a. Reward system:		
i. Commission payments: The company refrains from paying commissions.		
ii. Sales targets: The company has taken initial steps towards limiting sales targets (e.g. lowering sales targets, prohibiting the setting of individual sales targets).		
iii. Ethical considerations in bonus payments: No or only limited information is available on ethical considerations in the calculation of bonus payments (e.g. ethical sales, quality of service, customer satisfaction).		
Coverage: More than 20% of relevant operations (estimated).		
b. Staff training: No or only limited information is available on staff training regarding responsible sales practices.		
Coverage: The percentage of relevant operations covered is considered if sufficient content-related information is available to assess the indicator.		
c. Monitoring: The company implements some measures to monitor responsible sales practices, including monitoring and assessment of complaints received and customer surveys focusing on their post-sale understanding of products and services. No or only limited information is available on further measures (e.g. designation of clear responsibilities, evaluation of agents' competences and sales practices, mystery shopping and audits assessing responsible sales practices, regular screening of client risk profiles against the risk profile of the investment).		
Coverage: Less than 20% of relevant operations (estimated).		
A.2.2.2.3.2. Controversies relating to responsible sales practices	0.0%	x
Research did not reveal relevant controversies in recent years.		
A.2.2.2.4. Client relations	4.7%	C
A.2.2.2.4.1. Equal access to financial services	1.9%	B
a. Basic banking account: The company offers a basic banking account subject to moderate terms and conditions. No or only very limited information is available on active targeting of unbanked client groups.		
Coverage: 100% of relevant operations.		
b. Inclusive financial services: The company offers some inclusive financial services, including accessible banking services for clients with disabilities. No or only very limited information is available on further services, including banking services in the language of major immigrant groups, and banking activities in remote and/or deprived regions.		
Coverage: 100% of relevant operations.		
A.2.2.2.4.2. Responsible treatment of clients with debt repayment problems	2.8%	C-
a. Pre-emptive action: The company has taken pre-emptive actions to prevent client debt repayment problems, including proactively approaching customers potentially at risk. No or only limited information is available on further measures such as educational programmes for clients, covenants limiting indebtedness, and use of responsible lending performance indicators and targets to reduce the number of clients with debt repayment problems.		
b. Debt counselling and ombudsperson: The company offers internal debt counselling. No or only limited information is available on further services offered such as support for external debt counselling, and access to an ombudsperson for clients with debt repayment problems.		
c. Debt restructuring under non-detrimental conditions: No or only limited information is available on debt management options provided to clients with debt repayment problems under conditions that are not detrimental to clients, i.e. with regard to interest rates, contractual terms and additional costs.		
d. Mortgage sale and foreclosure: No or only very limited information is available on responsible handling of mortgage repayment difficulties, such as requiring customer consent in case of mortgage sale, only selling mortgages under conditions that are not detrimental to clients, guaranteeing that all alternative options are examined before undertaking foreclosure as a last resort, and providing support to clients in finding adequate housing prior to foreclosure.		
Coverage: More than 20% of relevant operations (estimated).		
A.2.2.2.4.3. Controversies relating to client relations	0.0%	x
Research did not reveal relevant controversies in recent years.		

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	Weight	Grade
A.2.2.2.5. Social financial services	1.9%	B-
<p>a. Provision of social financial services: The company provides some social financial services, including affordable services for charitable organisations and NGOs and social housing programmes for vulnerable or disadvantaged groups. No or only very limited information is available on further social financial services including community lending with a focus on disadvantaged regions and/or social infrastructure; programmes for social entrepreneurship and enterprises with social goals; or microfinance and social loan programmes (e.g. beneficial lending programmes for vulnerable or disadvantaged groups).</p> <p>b. Volume of relevant financial services: The relevant business volume is at a medium level (estimated).</p>		
A.2.2.2.6. Client tax compliance	1.9%	B-
A.2.2.2.6.1. Offshore banking and tax compliance	1.9%	B-
<p>a. Policy on tax evasion and tax avoidance of clients: The policy includes a clear commitment prohibiting support for clients in tax evasion and tax avoidance.</p> <p>Formality: None of the commitments are formal.</p> <p>Coverage: 100% of relevant operations.</p> <p>b. Position on offshore banking services: No indication is given that the company is present in jurisdictions enabling tax base erosion and profit shifting. However, it remains unclear whether this information is complete. In addition, no or only limited information is available on a position on offering offshore banking services (e.g. via co-operations).</p> <p>Coverage: 100% of relevant operations.</p> <p>c. Measures to ensure tax compliance of wealth management clients: Not applicable for companies that do not generate significant business from wealth management activities.</p> <p>Coverage: Not applicable for companies that do not generate significant business from wealth management activities.</p>		
A.2.2.2.6.2. Controversies relating to client tax compliance	0.0%	x
<p>Research did not reveal relevant controversies in recent years.</p>		
A.2.2.2.7. Other major company-specific issues related to customer and product responsibility	0.0%	x
<p>Not applicable as the company does not generate a significant sales volume through activities entailing other major customer and product responsibility issues than those already evaluated.</p>		
A.2.2.2.8. Additional controversies relating to customer and product responsibility	0.0%	x
<p>Research did not reveal relevant controversies in recent years.</p>		
A.3. Corporate Governance and Business Ethics	10.0%	B-
A.3.1. Corporate governance	3.3%	C-
A.3.1.1. Independence of the board and its governance of sustainability	1.7%	C+
A.3.1.1.1. Percentage of independent board members	0.6%	C
	2019	
Percentage of independent board members	50%	
As at:	2019-07-17	
A.3.1.1.2. Independent board chair	0.6%	A+
<p>The chair of the board is independent.</p> <p>As at: 2019-07-17</p>		

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	Weight	Grade	
A.3.1.1.3. Independent committees in charge of audit, remuneration, nomination, and sustainability	0.6%	D	
a. Audit committee:			
	2019		
Percentage of independent board members in the audit committee	50%		
As at:	2019-09-09		
Comment: The company has established an audit committee. However, as no information is available on committee composition, the percentage of independent board members cannot be assessed.			
b. Remuneration committee:			
	2019		
Percentage of independent board members in the remuneration committee	50%		
As at:	2019-09-09		
Comment: The company has established a remuneration committee. However, as no information is available on committee composition, the percentage of independent board members cannot be assessed.			
c. Nomination committee:			
	2019		
Percentage of independent board members in the nomination committee	60%		
As at:	2019-09-09		
Comment: The company has established a nomination committee. However, as no information is available on committee composition, the percentage of independent board members cannot be assessed.			
d. Sustainability committee:			
	2019		
Percentage of independent board members in the sustainability committee	n/a		
As at:	2019-09-09		
A.3.1.2. Shareholder democracy	0.0%	x	
A.3.1.2.1. Voting rights	0.0%	x	
a. Voting rights for common shares: Not applicable for non-listed companies.			
b. Restrictions on voting rights: Not applicable for non-listed companies.			
A.3.1.2.2. Size of shareholding necessary to introduce a new resolution	0.0%	x	
Not applicable for non-listed companies.			
A.3.1.2.3. Facilitation of shareholder participation	0.0%	x	
Measures to facilitate shareholder participation include:			
	Yes	No	No information / Not applicable
Voting on proxy resolutions via internet or phone	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Live broadcast of all parts of the AGM	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Access to company appointed proxies during the AGM	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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	Weight	Grade
Comment: Not applicable for non-listed companies. Not applicable for small and medium sized enterprises with less than 500 employees.		
A.3.1.3. Remuneration of members of the executive management team	1.7%	D
A.3.1.3.1. Public disclosure of compensation schemes for members of the executive management team	0.6%	C
Compensation is publicly disclosed for members of the executive management team as a whole (fixed amounts and variable performance-related components). No information is available on individual compensation schemes.		
A.3.1.3.2. Integration of sustainability performance objectives into the variable remuneration of members of the executive management team	1.1%	D-
No information is available on whether (or to what extent) relevant sustainability performance objectives are integrated into the variable remuneration of members of the executive management team.		
A.3.1.3.3. Public disclosure of CEO to employee compensation ratio	0.0%	x
Not applicable for small and medium sized enterprises with less than 500 employees.		
Ratio:	2019	
CEO compensation	n/a	
Median employee compensation	n/a	
Coverage: Not applicable for small and medium sized enterprises with less than 500 employees.		
A.3.2. Business ethics	6.7%	B+
A.3.2.1. Code of business ethics	2.2%	A+
a. Corruption: The company commitments refer in detail to the prohibition of corruption and facilitation payments.		
b. Antitrust violations: The company commitments refer to the prohibition of anti-competitive practices in general terms.		
c. Insider dealings: The company commitments set out clear and detailed rules regarding insider dealings.		
d. Gifts, favours and entertainment: The company commitments set out clear and detailed rules regarding gifts, favours and entertainment. They include moderate maximum amounts.		
e. Conflicts of interest: The company commitments clearly define procedures for (potential) conflicts of interest.		
f. Validity of financial information: The company commitments require validity of financial information in general terms.		
g. Money laundering: The company commitments refer in detail to the prohibition of money laundering.		
Formality: (Almost) all commitments are formal.		
Coverage: 100% of relevant operations.		
A.3.2.2. Compliance procedures	4.4%	B
a. Business ethics awareness: Employees are required to confirm in written form that they have read and understood the code.		
b. Compliance training: The company conducts comprehensive compliance training on (almost) all relevant aspects of business ethics. Details (e.g. on frequency and methods) are available.		
c. Compliance risk assessments and audits: Not applicable for small and medium sized enterprises with less than 500 employees.		
d. Third party anti-corruption due diligence: No information is available on whether the company conducts due diligence on third parties it works with (e.g. agents, consultants, advisors, joint venture partners), including regular screenings, risk assessments, compliance health checks, identification of red flags, structured approval processes and documentation, as well as checks on necessity, proper retention, expertise, integrity and method of payment.		
e. Facilitation of non-compliance reporting: Anonymous and confidential reporting channels are provided for employees.		
f. Whistleblower protection: No or only very limited information is available on ensuring non-retaliation against whistleblowers.		
Coverage: 100% of relevant operations.		
A.3.2.3. Controversies relating to business ethics	0.0%	x
Research did not reveal relevant controversies in recent years.		

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	Weight	Grade
B. Environmental Rating	50.0%	D+
B.1. Environmental Management	7.5%	C+
B.1.1. Environmental management system	3.3%	A-
B.1.1.1. Implementation of an environmental management system	3.3%	A-

Relevant elements implemented by the company:	Yes	No	No information / Not applicable
Formal environmental management policy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Structure and responsibilities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Environmental programmes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Targets and objectives	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Environmental training and awareness	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Data compilation system	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Environmental audits	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Coverage: 100% of operations.

B.1.1.2. Certification of the environmental management system to an international standard	0.0%	x
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Not applicable for small and medium sized enterprises with less than 500 employees.

B.1.2. Climate change strategy	2.5%	D-
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B.1.2.1. Position on climate change	0.1%	D+
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The company is committed to reducing a minor share of its total greenhouse gas emissions (including direct, indirect and relevant scope 3 emissions). No information is available on whether the company refers to climate change as a major challenge and addresses its own responsibility in this context.

Coverage: 100% of operations.

B.1.2.2. Greenhouse gas emission inventories	0.4%	D-
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a. Scopes covered by inventories: No information is available on whether the company compiles greenhouse gas emission inventories.

b. Activities covered by inventories: No information is available on whether the company compiles greenhouse gas emission inventories.

c. Greenhouse gases included: No information is available on whether the company compiles greenhouse gas emission inventories.

d. Disclosure of calculation method: No information is available on whether the company compiles greenhouse gas emission inventories.

e. External verification:

i. Scope of verification:

Not applicable / no information	<input checked="" type="checkbox"/>
Not verified	<input type="checkbox"/>
Less than 20% of relevant emissions verified	<input type="checkbox"/>
More than 20% of relevant emissions verified	<input type="checkbox"/>
More than 80% of relevant emissions verified	<input type="checkbox"/>

ii. Level of assurance:

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	Weight	Grade
Not applicable / no information	<input checked="" type="checkbox"/>	
No assurance	<input type="checkbox"/>	
Limited assurance	<input type="checkbox"/>	
Partly limited, partly reasonable	<input type="checkbox"/>	
Reasonable assurance	<input type="checkbox"/>	

Coverage: The percentage of relevant operations covered is considered if sufficient content-related information is available to assess the indicator.

Comment: External verification is not applicable for small and medium sized enterprises with less than 500 employees.

B.1.2.3. Greenhouse gas emission reduction targets and action plans 1.8% D

a. Greenhouse gas emission reduction targets: The company has set energy saving targets which possibly translate into an overall reduction of GHG emissions. However, no or only very limited information is available on clearly defined greenhouse gas emission reduction targets in line with the emission reductions required to limit the global temperature increase to 2°C compared to pre-industrial levels.

Reference	Target specification	Unit	Base year	Target year	Reduction from base year	Scopes
Energy use	Absolute target	n/a	2014	2020	3%	n/a
n/a	n/a	n/a	n/a	n/a	n/a	n/a
n/a	n/a	n/a	n/a	n/a	n/a	n/a

Coverage: More than 20% of operations (estimated).

b. Action plans to achieve reduction targets: No or only very limited information is available on an action plan to reduce greenhouse gas emissions comprising subgoals, planned measures to achieve greenhouse gas emission reductions (e.g. energy efficiency, use of renewable energy sources) and progress reports.

Coverage: The percentage of operations covered is considered if sufficient content-related information is available to assess the indicator.

B.1.2.4. Disclosure of climate change risks and mitigation strategy 0.3% D-

a. Exposure to climate change risks: No or only very limited information is available on whether the company assesses and provides information on any physical, regulatory, market, cost or legal risks related to climate change.

b. Mitigation/adaptation strategies: No or only very limited information is available on the implementation of mitigation and/or adaptation measures related to climate change risks.

Comment: Relevant risks include direct and indirect (i.e. client-related) risks such as physical risks (damage to own and/or financed objects and assets invested in affected industries due to weather extremes, e.g. floods, droughts, hurricanes, resource scarcity), regulatory risks (changes in environmental regulation, emission caps, carbon tax, regulation affecting clients in emission intensive sectors) and other risks (reputational and legal risks related to financing controversial projects; market risks related to changes in client behaviour due to e.g. rising lending costs related to climate change, increasing climate change awareness). Relevant adaptation and mitigation measures include a business continuity plan, energy efficiency measures, climate-related research and product development, integration of climate related criteria for lending and investment business, engagement with NGOs and experts.

B.1.2.5. Controversies relating to climate change 0.0% x

Research did not reveal relevant controversies in recent years.

B.1.3. Green procurement of office supplies 1.7% C

B.1.3.1. Percentage of paper (products) originating from recycled fibre and certified sustainable forestry 0.6% D+

The company purchases paper products fulfilling the following requirements:

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	2018	Weight	Grade
Recycled paper products (100% recovered fibre)	n/a		
FSC certified paper products	n/a		
PEFC certified paper products (estimated)	50%		
Unclear whether recycled or certified paper products	50%		

Comment: The company purchases paper products originating from recycled fibre and/or from certified sustainable forestry in line with FSC and/or PEFC. Relevant percentages are provided. However, it remains unclear whether this includes all relevant paper products (e.g. printing paper and paper products produced for the company). Therefore, relevant percentages were re-calculated.

B.1.3.2. Percentage of procured office IT equipment certified to or in compliance with internationally acknowledged standards 0.6% D-

No information is available on whether procured office IT equipment is certified to or in compliance with internationally acknowledged standards (e.g. ENERGY STAR Versions 5.0 or 6.0/1.2, EPEAT, ECMA 370/The Eco Declaration, Blue Angel, TCO, European Eco-label).

B.1.3.3. Percentage of purchased electricity originating from renewable energy sources 0.6% A+

The percentage of purchased electricity originating from renewable energy sources for office operations is more than 60%.

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	Weight	Grade
B.2. Products and Services	40.0%	D+
B.2.1. Environmental impact of products and services	4.0%	C
B.2.1.1. Environmental impacts of the product portfolio	4.0%	C
	2018	
	Share of net sales (est.)	
Products and services with an impact on the achievement of global environmental objectives		
Achieving sustainable agriculture and forestry:		
Contribution: no products or services with a direct and substantial impact	0%	
Obstruction: no products or services with a direct and substantial impact	0%	
Conserving water:		
Contribution: no products or services with a direct and substantial impact	0%	
Obstruction: no products or services with a direct and substantial impact	0%	
Contributing to sustainable energy use:		
Contribution: no products or services with a direct and substantial impact	0%	
Obstruction: no products or services with a direct and substantial impact	0%	
Promoting sustainable buildings:		
Contribution: no products or services with a direct and substantial impact	0%	
Obstruction: no products or services with a direct and substantial impact	0%	
Optimising material use:		
Contribution: no products or services with a direct and substantial impact	0%	
Obstruction: no products or services with a direct and substantial impact	0%	
Mitigating climate change:		
Contribution: no products or services with a direct and substantial impact	0%	
Obstruction: no products or services with a direct and substantial impact	0%	
Preserving marine ecosystems:		
Contribution: no products or services with a direct and substantial impact	0%	
Obstruction: no products or services with a direct and substantial impact	0%	
Preserving terrestrial ecosystems:		
Contribution: no products or services with a direct and substantial impact	0%	
Obstruction: no products or services with a direct and substantial impact	0%	
Other (Environmental):		
Contribution: no products or services with a direct and substantial impact	0%	
Obstruction: no products or services with a direct and substantial impact	0%	
B.2.1.2. Strategy shift towards a more environmentally beneficial product portfolio	0.0%	x
Not applicable as the company does not exhibit a clear and substantial strategy to shift its portfolio towards environmentally (more) beneficial products and/or services.		

Comment: For companies in the financial sector, the total business volume (including e.g. loan volume, assets under management, underwriting volume) is used as a reference value to calculate the percentages above. The company's product portfolio includes single products/services with direct and substantial negative impacts on the achievement of global environmental objectives (e.g. it cannot be excluded that the company offers financial services for companies involved in the coal and oil industry). However, these constitute a negligible share (estimated < 1%) of the total business volume.

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	Weight	Grade
B.2.2. Environmental aspects along the value chain	36.0%	D+
B.2.2.1. Climate impact of the corporate value chain	2.0%	D-
B.2.2.1.1. Carbon footprint of the portfolio	0.6%	D-
<p>a. Calculation of carbon footprint: No information is available on whether the company measures the carbon footprint of its product portfolio.</p> <p>b. Transparency on calculation method: No information is available on whether the company measures the carbon footprint of its product portfolio.</p> <p>Covered portfolio: The percentage of the portfolio covered is considered if sufficient content-related information is available to assess the indicator.</p>		
B.2.2.1.2. Portfolio decarbonisation strategy	1.2%	D-
<p>a. Climate mainstreaming: No or only very limited information is available on an approach to mainstream climate considerations into the company's product portfolio.</p> <p>Covered portfolio: The percentage of the portfolio covered is considered if sufficient content-related information is available to assess the indicator.</p> <p>b. Exclusion of carbon intensive activities: No information is available on whether the company excludes carbon intensive sectors and/or activities.</p> <p>Covered portfolio: The percentage of the portfolio covered is considered if sufficient content-related information is available to assess the indicator.</p> <p>c. Transition to low-carbon economy: No information is available on a commitment to increase the share of renewable energies or energy-efficient operations in relation to the company's overall product portfolio.</p> <p>Covered portfolio: The business areas covered are considered if sufficient content-related information is available to assess the indicator.</p>		
B.2.2.1.3. Monitoring and reporting	0.2%	D-
<p>a. Disclosure of carbon emission reduction: No information is available on whether the company has implemented portfolio decarbonisation strategies.</p> <p>Covered portfolio: The percentage of the portfolio covered is considered if sufficient content-related information is available to assess the indicator.</p>		
B.2.2.2. Lending and investment banking business	22.0%	D+
B.2.2.2.1. Environmental and social aspects in the credit rating process with regard to corporate/public sector customers	17.6%	D
B.2.2.2.1.1. Environmental and social aspects in corporate / public sector lending and investment banking	15.8%	D
B.2.2.2.1.1.1. General environmental and social guidelines for lending and/or investment banking	6.3%	C-
B.2.2.2.1.1.1.1. General environmental guidelines for lending and/or investment banking	3.2%	C-
<p>a. Content of general environmental guidelines:</p> <p>i. Environmental risk and impact management: No or only very limited information is available on environmental lending and investment banking guidelines covering client-related environmental risk and impact management aspects such as responsibilities; independent risk and impact assessments; programmes; independent performance monitoring and audits; and effective stakeholder engagement and grievance mechanisms.</p> <p>ii. Resource efficiency: The company's environmental lending and investment banking guidelines include client-related resource efficiency aspects relating to energy. No or only limited information is available on further aspects relating to water and solid materials, and the concepts of reduce, reuse, recycle or cradle to cradle.</p> <p>iii. Pollution prevention and management: No or only very limited information is available on environmental lending and investment banking guidelines covering client-related pollution prevention and management aspects relating to water; air; soil; best available technology; waste management; hazardous materials; and de-contamination and clean-up.</p> <p>iv. Ecosystems and biodiversity: The company excludes activities involving the use of genetically modified plants and animals. No information is available on environmental lending and investment banking guidelines covering client-related ecosystem and biodiversity aspects, such as biodiversity management (e.g. biodiversity mapping by relevant experts, biodiversity targets, monitoring); habitat loss; degradation and fragmentation; protection of vulnerable, endangered, and critically endangered species; invasive alien species; setting aside of biodiversity areas; biodiversity corridors; and restoration.</p> <p>v. Climate change: The company's environmental lending and investment banking guidelines cover climate change aspects only in general terms. No details are available on relevant aspects such as analysis of climate friendly alternatives; targets; programmes; and data compilation and monitoring.</p>		

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Weight Grade

vi. Exclusion of controversial business sectors and/or practices: The company excludes some relevant controversial business sectors and/or practices, including forest clearing and genetically modified organisms. No information is available on whether the company strictly excludes further relevant controversial sectors/practices, such as products or activities deemed illegal under host country laws or regulations or international conventions and agreements; pharmaceuticals, chemical compounds and other harmful substances subject to international phase-outs or bans (e.g. pesticides classified as extremely hazardous or highly hazardous); ozone-depleting substances subject to international phase-out; radioactive materials, with the exception of medical materials and quality-control equipment for which the radioactive source is trivial and adequately shielded; fur; controversial environmental practices (e.g. systematic behaviour resulting in contamination or pollution); degradation, fragmentation and/or conversion of high conservation value areas; trade in wildlife or wildlife products regulated under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES); and activities affecting vulnerable, endangered, critically endangered, and/or protected species.

vii. Additional topics: Not applicable for companies that do not have implemented additional relevant environmental lending and investment banking guidelines.

b. Bindingness of general environmental guidelines: Some but not all relevant aspects are formulated as clear requirements. It remains unclear whether these are covenanted.

Coverage: More than 20% of relevant operations (estimated).

B.2.2.2.1.1.2. General social guidelines for lending and/or investment banking

3.2% C-

a. Content of general social guidelines:

i. Social risk and impact management: No or only very limited information is available on social lending and investment banking guidelines covering client-related social risk and impact management aspects such as responsibilities; independent risk and impact assessments; programmes; independent performance monitoring and audits; and effective stakeholder engagement and grievance mechanisms.

ii. Human rights and livelihoods: The company's social lending and investment banking guidelines cover human rights and livelihoods aspects, including respect of internationally recognised human rights. No or only limited information is available on further aspects such as non-complicity in human rights violations; free, prior and informed consent (FPIC) of affected stakeholders; adequacy of resettlement compensation and livelihood restoration; timeliness of resettlement compensation and livelihood restoration; monitoring and/or audits of resettlement and livelihood restoration; adequate resettlement sites and/or resettlement sites in compliance with UN criteria for adequate housing; and benefit sharing mechanisms for affected stakeholders.

iii. Labour rights and working conditions: The company's social lending and investment banking guidelines cover client-related labour rights aspects, including child labour. No or only limited information is available on further aspects such as freedom of association; collective bargaining; equality and non-discrimination; internationally recognised minimum standards regarding hours of work, rest period, and voluntary overtime; wages; occupational health and safety; migrant workers; and contractors.

iv. Community health and safety: The company's social lending and investment banking guidelines do not cover community health and safety aspects such as infrastructure and equipment design and safety; hazardous materials management; traffic safety; exposure to noise, emissions and/or pollutants; and community emergency preparedness and response.

v. Vulnerable and/or disadvantaged populations: No or only very limited information is available on social lending and investment banking guidelines covering client-related aspects relating to vulnerable and/or disadvantaged populations such as identification of vulnerable and/or disadvantaged groups; special risk and impact assessments; and implementation of differentiated measures that avoid disproportionate negative impacts.

vi. Exclusion of controversial business sectors and/or practices: The company excludes some relevant controversial business sectors and/or practices including human rights violations (e.g. gross disregard of internationally acknowledged standards, activities negatively affecting indigenous people and their livelihoods), illegal child labour; forced labour, animal cruelty, prostitution, human trafficking and labour rights violations. No information is available on whether the company strictly excludes further relevant controversial sectors/practices including banned or controversial weapons; tobacco; alcohol; pornography; gambling; and unbonded asbestos fibres or other products with bonded asbestos as dominant material.

vii. Additional topics: Not applicable for companies that do not have implemented additional relevant social lending and investment banking guidelines.

b. Bindingness of general social guidelines: All relevant aspects are formulated as clear requirements. However, it remains unclear whether these are covenanted.

Coverage: More than 20% of relevant operations (estimated).

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	Weight	Grade
B.2.2.2.1.1.2. Guidelines covering sector-specific environmental and social requirements	3.2%	D
B.2.2.2.1.1.2.1. Forestry and paper guidelines	0.0%	x
B.2.2.2.1.1.2.1.1. Guidelines covering specific requirements for forestry	0.0%	x
a. Content of forestry guidelines:		
i. Sustainable forest management: Not applicable for companies that do not generate significant business from lending and investment banking to the forestry industry.		
ii. Ecosystems and biodiversity: Not applicable for companies that do not generate significant business from lending and investment banking to the forestry industry.		
iii. Working conditions: Not applicable for companies that do not generate significant business from lending and investment banking to the forestry industry.		
iv. Human rights and livelihoods: Not applicable for companies that do not generate significant business from lending and investment banking to the forestry industry.		
v. Community health and safety: Not applicable for companies that do not generate significant business from lending and investment banking to the forestry industry.		
vi. Corruption: Not applicable for companies that do not generate significant business from lending and investment banking to the forestry industry.		
vii. Conflict and security: Not applicable for companies that do not generate significant business from lending and investment banking to the forestry industry.		
viii. Exclusion of controversial practices: Not applicable for companies that do not generate significant business from lending and investment banking to the forestry industry.		
b. Bindingness of forestry guidelines: Not applicable for companies that do not generate significant business from lending and investment banking to the forestry industry.		
Coverage: Not applicable for companies that do not generate significant business from lending and investment banking to the forestry industry.		
B.2.2.2.1.1.2.1.2. Guidelines covering specific requirements for pulp and paper	0.0%	x
a. Content of pulp and paper guidelines:		
i. Sustainable management: Not applicable as the company does not generate significant business from lending and investment banking to the pulp and paper industry.		
ii. Responsible sourcing: Not applicable as the company does not generate significant business from lending and investment banking to the pulp and paper industry.		
iii. Working conditions: Not applicable as the company does not generate significant business from lending and investment banking to the pulp and paper industry.		
iv. Community health and safety: Not applicable as the company does not generate significant business from lending and investment banking to the pulp and paper industry.		
v. Exclusion of controversial practices: Not applicable as the company does not generate significant business from lending and investment banking to the pulp and paper industry.		
b. Bindingness of pulp and paper guidelines: Not applicable as the company does not generate significant business from lending and investment banking to the pulp and paper industry.		
Coverage: Not applicable as the company does not generate significant business from lending and investment banking to the pulp and paper industry.		
B.2.2.2.1.1.2.2. Energy generation guidelines	0.0%	x
B.2.2.2.1.1.2.2.1. Guidelines covering specific requirements for dams and hydropower	0.0%	x
a. Content of dams and hydropower guidelines:		
i. Alternatives to large dams: Not applicable for companies that do not generate significant business from lending and investment banking to the dams and hydropower industry.		
ii. Social and environmental risk, impact and cost assessments: Not applicable for companies that do not generate significant business from lending and investment banking to the dams and hydropower industry.		
iii. Ecosystems and biodiversity: Not applicable for companies that do not generate significant business from lending and investment banking to the dams and hydropower industry.		

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	Weight	Grade
<p>iv. Working conditions: Not applicable for companies that do not generate significant business from lending and investment banking to the dams and hydropower industry.</p> <p>v. Human rights and livelihoods: Not applicable for companies that do not generate significant business from lending and investment banking to the dams and hydropower industry.</p> <p>vi. Community health and safety: Not applicable for companies that do not generate significant business from lending and investment banking to the dams and hydropower industry.</p> <p>vii. Corruption: Not applicable for companies that do not generate significant business from lending and investment banking to the dams and hydropower industry.</p> <p>viii. Conflict and security: Not applicable for companies that do not generate significant business from lending and investment banking to the dams and hydropower industry.</p> <p>ix. Exclusion of controversial practices: Not applicable for companies that do not generate significant business from lending and investment banking to the dams and hydropower industry.</p> <p>b. Bindingness of dams and hydropower guidelines: Not applicable for companies that do not generate significant business from lending and investment banking to the dams and hydropower industry.</p> <p>Coverage: Not applicable for companies that do not generate significant business from lending and investment banking to the dams and hydropower industry.</p>		
<p>B.2.2.2.1.1.2.2.2. Guidelines covering specific requirements for coal-fired power plants</p> <p>a. Content of coal-fired power plant guidelines:</p> <p>i. Sustainable management: Not applicable for companies that do not generate significant business from lending and investment banking to the coal-fired power plant industry.</p> <p>ii. Responsible sourcing: Not applicable for companies that do not generate significant business from lending and investment banking to the coal-fired power plant industry.</p> <p>iii. Working conditions: Not applicable for companies that do not generate significant business from lending and investment banking to the coal-fired power plant industry.</p> <p>iv. Communities and livelihoods: Not applicable for companies that do not generate significant business from lending and investment banking to the coal-fired power plant industry.</p> <p>v. Corruption: Not applicable for companies that do not generate significant business from lending and investment banking to the coal-fired power plant industry.</p> <p>vi. Exclusion of controversial practices: Not applicable for companies that do not generate significant business from lending and investment banking to the coal-fired power plant industry.</p> <p>b. Bindingness of coal-fired power plants guidelines: Not applicable for companies that do not generate significant business from lending and investment banking to the coal-fired power plant industry.</p> <p>Coverage: Not applicable for companies that do not generate significant business from lending and investment banking to the coal-fired power plant industry.</p>	0.0%	x
<p>B.2.2.2.1.1.2.2.3. Guidelines covering specific requirements for nuclear power</p> <p>a. Content of nuclear power guidelines: Not applicable for companies that do not generate business from financial products and services to the energy sector.</p> <p>b. Bindingness of nuclear power guidelines: Not applicable for companies that do not provide financial products and services to the energy sector.</p> <p>Coverage: Not applicable for companies that do not generate business from financial products and services to the energy sector.</p>	0.0%	x
<p>B.2.2.2.1.1.2.3. Resource extraction and related infrastructure guidelines</p>	0.0%	x
<p>B.2.2.2.1.1.2.3.1. Guidelines covering specific requirements for mining and related infrastructure</p> <p>a. Content of mining and related infrastructure guidelines:</p> <p>i. Sustainable management: Not applicable for companies that do not generate significant business from lending and investment banking to the mining industry.</p> <p>ii. Ecosystems and biodiversity: Not applicable for companies that do not generate significant business from lending and investment banking to the mining industry.</p> <p>iii. Working conditions: Not applicable for companies that do not generate significant business from lending and investment banking to the mining industry.</p>	0.0%	x

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Weight Grade

iv. Human rights and livelihoods: Not applicable for companies that do not generate significant business from lending and investment banking to the mining industry.

v. Community health and safety: Not applicable for companies that do not generate significant business from lending and investment banking to the mining industry.

vi. Transparency, tax and sovereignty: Not applicable for companies that do not generate significant business from lending and investment banking to the mining industry.

vii. Corruption: Not applicable for companies that do not generate significant business from lending and investment banking to the mining industry.

viii. Conflict and security: Not applicable for companies that do not generate significant business from lending and investment banking to the mining industry.

ix. Exclusion of controversial practices: Not applicable for companies that do not generate significant business from lending and investment banking to the mining industry.

b. Bindingness of mining and related infrastructure guidelines: Not applicable for companies that do not generate significant business from lending and investment banking to the mining industry.

Coverage: Not applicable for companies that do not generate significant business from lending and investment banking to the mining industry.

B.2.2.2.1.1.2.3.2. Guidelines covering specific requirements for oil, gas and related infrastructure

0.0% x

a. Content of oil, gas and related infrastructure guidelines:

i. Sustainable management: Not applicable for companies that do not generate significant business from lending and investment banking to the oil and gas industry.

ii. Ecosystems and biodiversity: Not applicable for companies that do not generate significant business from lending and investment banking to the oil and gas industry.

iii. Working conditions: Not applicable for companies that do not generate significant business from lending and investment banking to the oil and gas industry.

iv. Human rights and livelihoods: Not applicable for companies that do not generate significant business from lending and investment banking to the oil and gas industry.

v. Community health and safety: Not applicable for companies that do not generate significant business from lending and investment banking to the oil and gas industry.

vi. Transparency, tax and sovereignty: Not applicable for companies that do not generate significant business from lending and investment banking to the oil and gas industry.

vii. Corruption: Not applicable for companies that do not generate significant business from lending and investment banking to the oil and gas industry.

viii. Conflict and security: Not applicable for companies that do not generate significant business from lending and investment banking to the oil and gas industry.

ix. Exclusion of controversial practices: Not applicable for companies that do not generate significant business from lending and investment banking to the oil and gas industry.

b. Bindingness of oil, gas and related infrastructure guidelines: Not applicable for companies that do not generate significant business from lending and investment banking to the oil and gas industry.

Coverage: Not applicable for companies that do not generate significant business from lending and investment banking to the oil and gas industry.

B.2.2.2.1.1.2.4. Agriculture, fisheries and aquaculture guidelines

3.2% D

B.2.2.2.1.1.2.4.1. Guidelines covering specific requirements for agriculture

1.6% D

a. Content of agriculture guidelines:

i. Sustainable management of crop cultivation: No or only very limited information is available on environmental and social guidelines for the agricultural industry, which cover client-related sustainable management aspects for crop cultivation such as independent social and environmental risk assessments and monitoring; water resources; water contamination and eutrophication; soil erosion and fertility; atmospheric emissions; responsible use of pesticides, herbicides, and fertilizers; alternatives to pesticides; herbicides, and fertilizers; crop rotation; polyculture farming instead of monoculture farming (crop diversity); and crop residues and solid waste.

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Weight Grade

ii. Sustainable management of animal husbandry: No or only very limited information is available on environmental and social guidelines for the agricultural industry, which cover client-related sustainable management aspects for animal husbandry such as independent social and environmental risk assessments and monitoring; managed grazing and prevention of overgrazing; position on large-scale livestock farming; wastewater; waste management; air emissions; animal feed; disease control; minimal and responsible use of antibiotics; animal hunger and thirst; animal discomfort, fear and distress; animal pain and injury; and expression of normal behaviour.

iii. Ecosystems and biodiversity: The company excludes activities involving the cultivation of genetically modified plants and/or breeding of genetically modified animals. No information is available on environmental and social guidelines for the agricultural industry, which cover client-related ecosystem and biodiversity aspects such as biodiversity management (including mapping / monitoring); bufferland and biodiversity areas; wildlife breeding, feeding, and staging areas; reduction of soil preparation (e.g. low-till and no-till strategies); protection of vulnerable, endangered, and critically endangered species; invasive alien species; and minimal disturbance during harvesting and gathering.

iv. Working conditions: The company has environmental and social guidelines specifically tailored to the agricultural industry, which cover client-related aspects relating to labour rights including child labour. No or only limited information is available on further aspects including freedom of association; collective bargaining; internationally recognised minimum standards regarding hours of work, rest period, and voluntary overtime; remuneration; and occupational health and safety (including chemical hazards; physical hazards; hazardous materials in animal husbandry and agricultural processing (e.g. disinfecting agents); confined spaces; organic dust; fire and explosion; and biological agents) of own staff and/or on-site contractors.

v. Human rights and livelihoods: The company has environmental and social guidelines specifically tailored to the agricultural industry, which cover client-related human rights and livelihood aspects including respect of internationally recognised human rights. No or only limited information is available on further aspects including non-complicity in human rights violation; free, prior and informed consent (FPIC) of affected stakeholders; effective stakeholder engagement and grievance mechanisms; water availability; adequacy and timeliness of resettlement compensation and livelihood restoration; monitoring and audits of resettlement and livelihood restoration; adequate resettlement sites and/or resettlement sites in compliance with UN criteria for adequate housing; and benefit sharing mechanisms for affected stakeholders.

vi. Community health and safety: No or only very limited information is available on environmental and social guidelines for the agricultural industry, which cover client-related community health and safety aspects such as pesticide exposure and storage of chemicals; air emissions exposure; pathogens exposure (e.g. through manure); odors; food safety; and water resources.

vii. Corruption: No or only very limited information is available on environmental and social guidelines for the agricultural industry, which cover corruption and facilitation payments by the client (e.g. relating to land concessions, land acquisitions, certifications, environmental damage).

viii. Conflict and security: No or only very limited information is available on environmental and social guidelines for the agricultural industry, which cover client-related aspects relating to authoritarian regimes, conflict regions, and security issues such as a clear position on cooperation with authoritarian regimes; conflict-sensitive due-diligence; a clear commitment to avoid complicity in human rights violations by public security forces; and a specific reference to clients' security personnel (including risk assessment; screening of past abuses; rules of conduct; training; monitoring; and investigation and reporting of abusive acts).

ix. Exclusion of controversial practices: No or only very limited information is available on excluded controversial practices such as the use of dangerous pesticides and herbicides; force-feeding; genetically modified plants and/or animals and/or animal feed; degradation, fragmentation and/or conversion of high conservation value areas; activities resulting in a significant negative impact on the health and safety of affected communities and/or indigenous people; activities resulting in a significant negative impact on the livelihoods of affected communities and/or indigenous people; land grabbing; forced displacement of indigenous people; illegal child labour; forced labour; and activities breaching internationally acknowledged labour rights standards.

b. Bindingness of agriculture guidelines: Some but not all relevant aspects are formulated as clear requirements. However, it remains unclear which aspects are covenanted.

Coverage: More than 20% of relevant operations (estimated).

B.2.2.2.1.1.2.4.2. Guidelines covering specific requirements for fisheries and aquaculture

1.6% D

a. Content of fisheries and aquaculture guidelines:

i. Sustainable management of fisheries: No or only very limited information is available on environmental and social guidelines for the fisheries industry, which cover client-related sustainable management aspects such as independent social and environmental risk assessments and monitoring; net sizes and types; bycatch; organic waste management; petroleum and hazardous materials management; wastewater and other effluents; air emissions; and solid waste generation and management.

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Weight Grade

ii. Sustainable management of aquaculture: No or only very limited information is available on environmental and social guidelines for the aquaculture industry, which cover client-related sustainable management aspects such as independent social and environmental risk assessments and monitoring; plant-based feeds from sustainable agriculture; cultivation of native species in bag nets, closed-wall sea-pens or equivalent systems; cultivation of non-native species restricted to land-based tanks; risk prevention for local wild populations; stocking densities that minimise the risk of disease outbreaks and transmission; net loss prevention in fish protein yield; water management; discharges and effluents; soil erosion and sedimentation; and fertilizers and chemicals.

iii. Ecosystems and biodiversity: No or only very limited information is available on environmental and social guidelines for the fisheries and aquaculture industry, which cover client-related ecosystem and biodiversity aspects such as overfishing; no-take zones; marine biodiversity management (including mapping; monitoring of fish populations; restoration of fish species); protection of vulnerable, endangered, and critically endangered species; degradation and fragmentation; and invasive alien species.

iv. Working conditions: No or only very limited information is available on environmental and social guidelines for the fisheries and aquaculture industry, which cover client-related labour rights aspects such as freedom of association; collective bargaining; internationally recognised minimum standards regarding hours of work, rest period, and voluntary overtime; remuneration; occupational health and safety (including chemical hazards; physical hazards; crew accommodation and working spaces; confined spaces; noise and vibration; exposure to heat and cold; biological hazards; security issues) of own staff and on-site contractors.

v. Human rights and livelihoods: The company has environmental and social guidelines for the fisheries and aquaculture industry, which cover client-related human rights and livelihood aspects including respect of internationally recognised human rights. No or only limited information is available on further aspects including non-complicity in human rights violation; free, prior and informed consent (FPIC) of affected stakeholders; effective stakeholder engagement and grievance mechanisms; adequacy and timeliness of livelihood safeguarding and/or restoration; monitoring and audits of livelihood safeguarding and/or restoration; and benefit sharing mechanisms for affected stakeholders.

vi. Community health and safety: No or only very limited information is available on environmental and social guidelines for the fisheries and aquaculture industry, which cover client-related community health and safety aspects such as salinisation of agricultural land; water resources (quantity and quality); food safety; and physical hazards.

vii. Corruption: No or only very limited information is available on environmental and social guidelines for the fisheries and aquaculture industry, which cover corruption and facilitation payments by the client (e.g. relating to fisheries concessions, certifications, environmental damage).

viii. Conflict and security: No or only very limited information is available on environmental and social guidelines for the fisheries and aquaculture industry, which cover client-related aspects relating to authoritarian regimes, conflict regions, and security issues such as a clear position on cooperation with authoritarian regimes; conflict-sensitive due-diligence; a clear commitment to avoid complicity in human rights violations by public security forces; and a specific reference to clients' security personnel (including risk assessment; screening of past abuses; rules of conduct; training; monitoring; and investigation and reporting of abusive acts).

ix. Exclusion of controversial practices: No or only very limited information is available on excluded controversial practices such as controversial fishing practices (flags of convenience; bottom trawling; drift net fishing; fishing with explosives or poison; fishing in marine-protected environments; unregulated or unreported fishing; ghost-fishing; fishing of vulnerable, endangered, critically endangered, and protected species); controversial aquaculture practices (wild-caught juveniles; genetically engineered fish or feed; selective breeding; conversion of high conservation value areas into aquacultures; fishmeal or fish-oil-based feeds from unsustainable fisheries); activities resulting in a significant negative impact on the health and safety of affected communities and/or indigenous people; activities resulting in a significant negative impact on the livelihoods of affected communities and/or indigenous people; and activities severely breaching internationally acknowledged labour rights standards.

b. Bindingness of fisheries and aquaculture guidelines: All relevant aspects are formulated as clear requirements. However, it remains unclear which aspects are covenanted.

Coverage: More than 20% of relevant operations (estimated).

B.2.2.2.1.3. Application procedures of environmental and social guidelines and transparency on implementation

6.3% D-

a. Application procedures:

i. Risk and impact assessment: The company conducts environmental and social risk and impact assessments. No details are provided on whether the risk and impact assessments cover all key stages of the project cycle; the client's environmental and social risk management capacity; relevant stakeholders; reassessment in case of significant changes and whether independent social and environmental risk and impact assessments always serve as input.

ii. Action plans: No or only very limited information is available on company requirements for clients to provide detailed action plans in case of social and environmental deficiencies (including clear performance indicators and targets, a defined time period, a baseline).

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	Weight	Grade
<p>iii. Approval process and responsibilities: The company provides information on project/loan approval processes and responsibilities. No information is available on high-level management approval of projects/loans with potential significant and/or less adverse impacts (category A and/or B projects).</p> <p>iv. Monitoring and supervision: No or only limited information is available on project/loan monitoring and supervision processes, including information on regularity and content of client reporting as well as independence of reports (based on relevant information and site visits).</p> <p>v. Disengagement in case of non-compliance with environmental and social guidelines: No or only very limited information is available on clear procedures for disengagement in case of non-compliance with environmental and social guidelines.</p> <p>vi. Training: No or only very limited information is available on training conducted on environmental and social guidelines and their application.</p> <p>vii. Grievance and accountability mechanism: No or only very limited information is available on a grievance and accountability mechanism at institutional level.</p> <p>Coverage: The percentage of relevant operations covered is considered if sufficient content-related information is available to assess the indicator.</p>		
<p>b. Transparency:</p> <p>i. Aggregated: The company does not publicly disclose aggregated information on projects/loans it has approved and/or rejected, including information on number of transactions, volume, environmental and social risk category, sector, and region.</p> <p>ii. Client-specific: The company does not publicly disclose client/project-specific information such as client name; purpose; sector; location; type of financial service; total volume; risk category and scope of review; date of approval, signature and/or disbursement or service; and current status.</p> <p>Coverage: The percentage of relevant operations covered is considered if sufficient content-related information is available to assess the indicator.</p>		
<p>B.2.2.2.1.4. Controversies relating to environmental and social issues in the credit rating process with regard to corporate / public sector customers</p>	0.0%	x
<p>a. Controversies relating to environmental issues in the credit rating process with regard to corporate / public sector customers: Research did not reveal relevant controversies in recent years.</p> <p>b. Controversies relating to social issues in the credit rating process with regard to corporate / public sector customers: Research did not reveal relevant controversies in recent years.</p>		
<p>B.2.2.2.1.2. Green financial services for corporate and public sector customers</p>	1.8%	D-
<p>a. Provision of green financial services: No information is available on whether the company offers green financial services/programmes (e.g. financing of solar and/or wind power, financing of energy efficiency technologies, financing of sustainable buildings according to internationally recognised standards, and/or relevant green bond underwriting).</p> <p>b. Volume of relevant financial services: The relevant business volume is considered if sufficient content-related information is available to assess the indicator.</p>		
<p>B.2.2.2.2. Environmental aspects in retail lending</p>	4.4%	C-
<p>B.2.2.2.2.1. Environmental aspects in the retail credit rating process</p>	2.2%	C+
<p>The company's environmental lending guidelines cover client-related aspects such as resource efficiency. No or only very limited information is available on further aspects (e.g., best available technology, environmentally-sound materials and construction processes, waste management, emission levels, climate-friendly alternatives).</p> <p>Coverage: More than 50% of operations (estimated).</p>		
<p>B.2.2.2.2.2. Green financial services for private customers</p>	2.2%	D+
<p>a. Provision of green financial services: The company offers green financial services/programmes, including loans for eco-efficient houses. No or only very limited information is available on further products (e.g. loans for eco-efficiency refurbishments).</p> <p>b. Volume of relevant financial services: Less than 1% of relevant business volume (estimated).</p>		
<p>B.2.2.3. Asset management and own investments</p>	12.0%	D+
<p>B.2.2.3.1. Environmental and social guidelines for mainstream asset management services, structured investment products and/or brokerage services</p>	3.0%	D-
<p>a. Positive screening:</p> <p>i. Scope of criteria: No or only limited information is available on environmental and social guidelines for mainstream asset management.</p> <p>ii. Strictness: No information is available on environmental and social guidelines for mainstream asset management.</p>		

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Weight Grade

Coverage: The percentage of relevant operations covered is considered if sufficient content-related information is available to assess the indicator.

b. Negative screening:

i. Scope of criteria: No or only limited information is available on environmental and social guidelines for mainstream asset management.

ii. Strictness: No or only limited information is available on environmental and social guidelines for mainstream asset management.

Coverage: The percentage of relevant operations covered is considered if sufficient content-related information is available to assess the indicator.

B.2.2.3.2. Socially responsible investment

3.6% B-

B.2.2.3.2.1. Socially responsible investment products and services

1.8% B+

a. Positive and negative screening:

i. Scope of criteria: A broad range of best-in-class and exclusion criteria (e.g. human and labour rights, environmental protection, business ethics, CSR-related corporate governance, customer responsibility, product sustainability, controversial sectors) are applied to socially responsible investment products and services.

ii. Strictness: Criteria are based on internationally accepted standards, a high threshold is set on a clearly defined rating scale, exclusion cases are clearly defined and there are no significant restrictions.

iii. Application of criteria: Various products/services offered apply the scope of criteria cited above.

b. Sustainability-themed investment and impact investment:

i. Scale of social and/or environmental benefit: The business areas/activities supported by theme funds and/or impact investment engender substantial social and/or environmental benefits (e.g. poverty reduction, climate and environmental protection, better working conditions).

ii. Selection criteria: The company applies relevant selection criteria (clear sustainability criteria and exclusions).

iii. Application of criteria: The social and/or environmental benefits referred to above are only valid for one theme fund or impact investment. No or only limited information is available on further theme funds or impact investments.

c. Range of products and services: The company offers a limited range of socially responsible investment products/services for retail and/or institutional customers.

B.2.2.3.2.2. Volume of strict and diligently selected socially responsible investments

1.8% C

The current volume of assets under management assessed for outstanding environmental or social performance (on the basis of strict criteria) is less than 1% of total assets under management.

B.2.2.3.3. Environmental and social guidelines for own investments

1.2% D

a. Positive screening:

i. Scope of criteria: No or only limited information is available on environmental and social guidelines for own investments.

ii. Strictness: No or only limited information is available on environmental and social guidelines for own investments.

Coverage: The percentage of relevant operations covered is considered if sufficient content-related information is available to assess the indicator.

b. Negative screening:

i. Scope of criteria: Guidelines cover some exclusion criteria, including controversial sectors such as weapons and nuclear energy and violations regarding human rights. No information is available on further criteria (e.g. controversial environmental practices; labour rights, business ethics and customer responsibility; controversial sectors such as GMOs, tobacco, and pornography; countries ranked poorly with regard to human and civil rights).

ii. Strictness: No information is available on whether exclusion criteria are based on internationally accepted standards, exclusion cases are clearly defined and there are no exceptions.

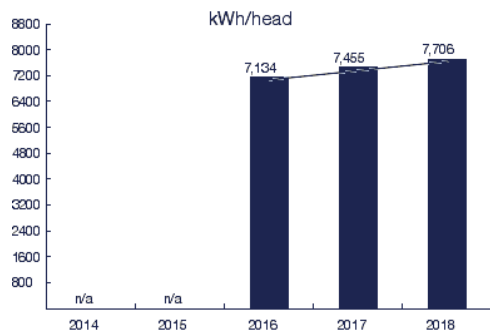
Coverage: 100% of relevant operations.

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	Weight	Grade				
B.2.2.3.4. Application procedures of environmental and social guidelines for asset management and own investments	1.8%	D+				
<p>As part of its application procedure for environmental and social standards in asset management and/or own investments, the company makes use of extensive external and/or internal research, cooperates with external experts, trains relevant staff and undertakes portfolio monitoring. No information is available on whether the company has established clear responsibilities, applies evaluation tools and has defined a divestment process.</p> <p>Coverage: Less than 20% of assets and/or investments (estimated).</p>						
B.2.2.3.5. Engagement / Shareholder advocacy activities	2.4%	D-				
<p>a. Commitment:</p> <p>i. Scope of topics: No or only limited information is available on engagement with investee companies regarding social and environmental issues.</p> <p>ii. Applicability: No or only limited information is available on engagement with investee companies regarding social and environmental issues.</p> <p>iii. Divestment: No or only limited information is available on engagement with investee companies regarding social and environmental issues.</p> <p>b. Tools: No or only limited information is available on engagement with investee companies regarding social and environmental issues.</p> <p>c. Reporting on engagement outcomes: No or only limited information is available on engagement with investee companies regarding social and environmental issues.</p> <p>Coverage: The volume of relevant assets is considered if sufficient content-related information is available to assess the indicator.</p>						
B.2.2.3.6. Controversies relating to environmental and social issues in asset management and own investments	0.0%	x				
<p>a. Controversies relating to environmental issues in asset management and own investments: Research did not reveal relevant controversies in recent years.</p> <p>b. Controversies relating to social issues in asset management and own investments: Research did not reveal relevant controversies in recent years.</p>						
B.2.2.4. Other major company-specific issues related to the integration of environmental considerations into products and services	0.0%	x				
<p>Not applicable as the company does not generate a significant sales volume through activities entailing other major environmental issues than those already evaluated.</p>						
B.2.2.5. Additional controversies relating to environmental issues	0.0%	x				
<p>Research did not reveal relevant controversies in recent years.</p>						
B.3. Eco-efficiency	2.5%	C-				
B.3.1. Energy efficiency	0.6%	D+				
B.3.1.1. Energy intensity	0.6%	D+				
<p>The energy intensity is at a common industry level and has increased in recent years.</p>						
	Unit	2014	2015	2016	2017	2018
Energy use	GWh	n/a	n/a	2.39	2.46	2.52
Employees	head	n/a	n/a	335	330	327
Energy use per Employees	kWh/head	n/a	n/a	7,134	7,455	7,706

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Weight Grade



Coverage: More than 80% of relevant operations.

B.3.2. Carbon intensity

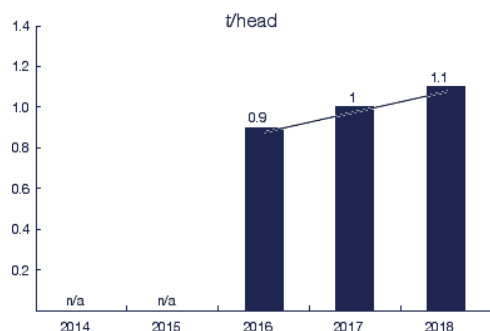
1.3% D-

B.3.2.1. Greenhouse gas emission intensity

1.3% D-

As data is not available for (all) relevant operations or activities, greenhouse gas intensity could not be assessed.

	Unit	2014	2015	2016	2017	2018
GHG emissions	t	n/a	n/a	316	343	368
Employees	head	n/a	n/a	335	330	327
GHG emissions per Employees	t/head	n/a	n/a	0.90	1.00	1.10



Coverage: The percentage of relevant operations covered is considered if sufficient content-related information is available to assess the indicator.

Comment: A benchmark analysis is not possible as only scopes 1 and 2 are included in the available data. No data on scope 3 was provided.

B.3.3. Water efficiency

0.1% A+

B.3.3.1. Freshwater use intensity

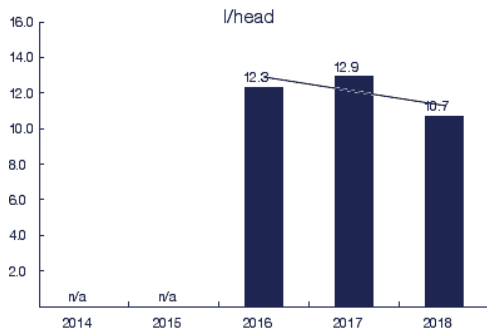
0.1% A+

The freshwater use intensity has decreased in recent years.

	Unit	2014	2015	2016	2017	2018
Freshwater use	m3	n/a	n/a	4,133.87	4,248.66	3,511.38
Employees	head	n/a	n/a	335	330	327
Freshwater use per Employees	l/head	n/a	n/a	12.30	12.90	10.70

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Weight Grade



Coverage: More than 80% of relevant operations.

B.3.4. Operating and raw material efficiency

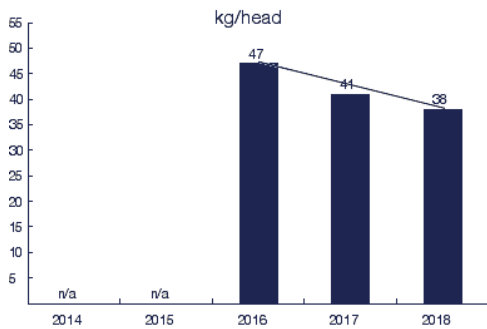
0.5% A+

B.3.4.1. Paper use intensity

0.5% A+

The paper use intensity is comparatively low and has decreased in recent years.

	Unit	2014	2015	2016	2017	2018
Paper use	t	n/a	n/a	15.72	13.43	12.48
Employees	head	n/a	n/a	335	330	327
Paper use per Employees	kg/head	n/a	n/a	47	41	38



Coverage: More than 80% of relevant operations.

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Annex

Information Sources – Company Sources

Publicly available company documentation, such as annual reports, social and environmental reports and sustainability reports, as well as company web pages. In addition, internal documents or other company information (e.g. obtained through interviews with company representatives), if provided.

Information Sources – External Sources (examples only)

Amazon Watch	Institute for Global Labour and Human Rights
Amnesty International	International Labor Organization (ILO)
Asahi Shimbun	International Rivers
BankTrack	International Trade Union Confederation (ITUC)
BBC	Organisation for Economic Co-operation and Development (OECD)
Business & Human Rights Resource Centre	Oxfam
CDP Responses	Principles for Responsible Investment
Centre for Research on Multinational Corporations (SOMO)	Responsible Investor
China Labour Watch	Reuters
Competition Authorities (e.g. US Federal Trade Commission)	S&P Capital IQ
CorpWatch	Taipei Times
ECA Watch	The Economist
Electoral Commissions (e.g. UK Electoral Commission)	The Guardian
Environmental Agencies (e.g. European Environment Agency)	The Washington Post
Environmental Defense Fund	Transparency International
Equator Principles	UK Financial Conduct Authority
Erklärung von Bern	UN Global Compact
European Restructuring Monitor	UNEP Financial Initiative
European Union institutions (e.g. European Commission)	urgewald
Facing Finance	US Consumer Financial Protection Bureau
Fair Labor Association	US Department of Justice
Financial Times	US Equal Employment Opportunity Commission
Freedom House	US Securities and Exchange Commission
Friends of the Earth	Wall Street Journal
Greenpeace	World Health Organization
Handelsblatt	World Wildlife Fund (WWF)
Human Rights Watch	

Participation in Rating Process

The rating report was prepared based on publicly available company documentation and information from external sources such as NGOs, authorities, trade unions and the media. It was subsequently submitted to the company for consideration and feedback. The company actively participated in the rating process and provided additional information.

Contact ISS ESG

Sector Specialist

Annette Gregori
Goethestrasse 28
DE - 80336 Munich
E-Mail: Annette.Gregori@iss-esg.com
Web: www.iss-esg.com

Contributing Analyst

Lukas Lohrer
Goethestrasse 28
DE - 80336 Munich
Web: www.iss-esg.com

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