

Survey Results

Task Force on Climate-related Financial Disclosures (TCFD)



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Table of Contents

1. Introduction	3
2. Summary.....	5
3. Results	8
a. South African Insurance Industry	8
b. South African Banking Industry.....	24
4. Annexure A: Insurance Survey.....	37
5. Annexure B: Banking Survey	49

1. Introduction

In recent years, climate change and its potential impact on the financial sector have seen increased attention, not only from a financial industry perspective but also from various international authorities and initiatives. One of these is the Sustainable Insurance Forum (SIF)¹, a leadership group of insurance supervisors and regulators working together to strengthen their understanding of, and hence their responses to, sustainability issues facing the insurance sector, which would include climate change.

During 2017 and 2018 the SIF focused its efforts on exploring climate-related issues, culminating with the release of a joint Issues Paper on Climate Change Risks to the Insurance Sector with the International Association of Insurance Supervisors (IAIS)². This Paper recognised that the complex, interrelated, non-linear, and dynamic challenges presented by climate risks require a strategic response from insurers across business lines, levels of management, and the broader insurance value chain. In particular, it recognised the importance of the Recommendations and Supplemental Guidance published by the Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)³. The TCFD recommendations has set a global voluntary framework for the identification and assessment, and thereafter the management and public disclosure, of climate-related risks and opportunities in mainstream financial publications.

At the 2018 International Association of Insurance Supervisors (IAIS) Annual Conference, the Chair of the IAIS Executive Committee requested that the SIF work with the IAIS to develop an issues paper on the implementation of the TCFD recommendations in the insurance sector. As input into this issues paper, each of the member jurisdictions were requested to survey the insurers in their respective jurisdictions to obtain more information on the implementation of the TCFD recommendations.

The Prudential Authority (PA), as a member of SIF, distributed a survey to the South African insurance sector during February 2019 to gather a representative view of

¹ <https://www.sustainableinsuranceforum.org>

² <https://www.iaisweb.org>

³ <https://www.fsb-tcfd.org>

insurers' awareness, understanding, level of uptake and implementation of the TCFD recommendations. The results of this survey was used to inform the IAIS/SIF Issues Paper on TCFD Implementation, complementing other sources of information on current market practices.

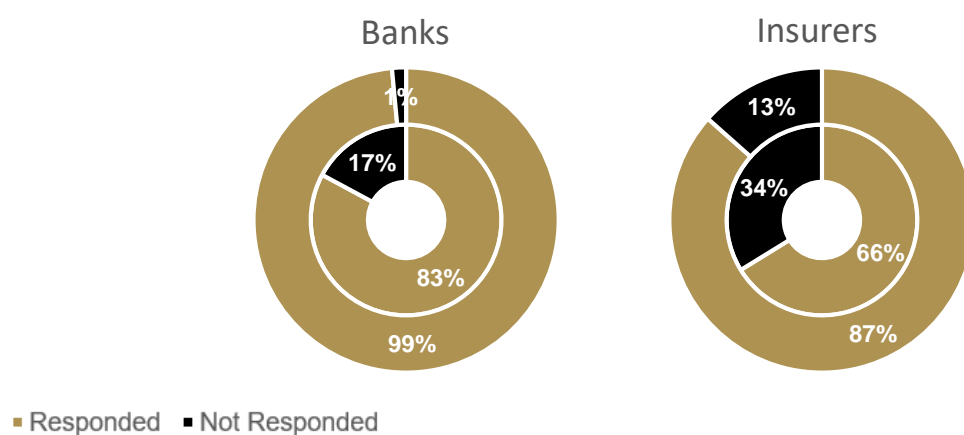
Subsequent to receiving the results from the insurance survey, the PA decided to expand it to the South African banking sector to get a wider financial sector view on the implementation of the TCFD recommendations. This subsequent survey was distributed during October 2019.

Both these TCFD surveys aid the PA in understanding both the insurance and banking industry's awareness around climate change and the reporting landscape on climate-related information. It also informs the PA's strategy and its supervisory approach as it relates to climate change. The current paper provides a summary of the results as well as the aggregated results on each of the survey questions for the banking and insurance industries separately.

2. Summary

The survey, although voluntary, attracted keen interest by industry participants, as can be seen from the response rates below. The graphs show the response rate in terms of number (inner circle) and asset size (outer circle) of the relevant industries.

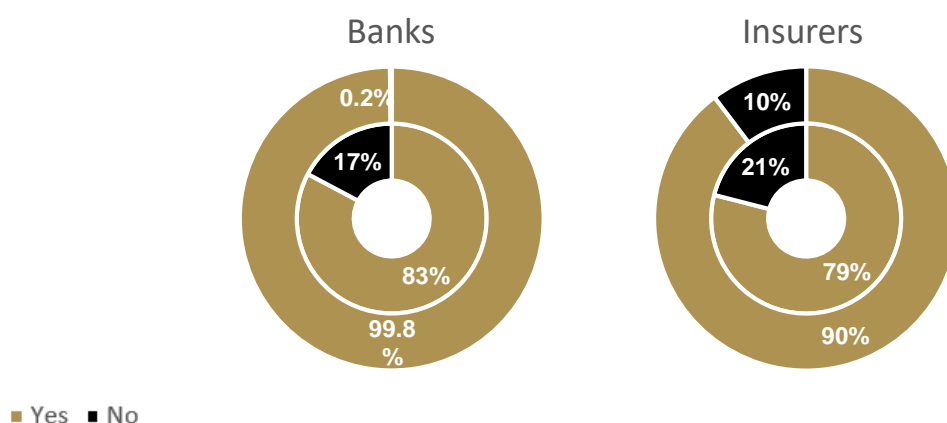
Figure 1: Survey Responses



The results from the survey cover a significant sampling of each of the industries, both in terms of number and size.

The graphs below show the number (inner circle) and asset size (outer circle) of industry participants who believe that climate change would affect their business (i.e. based on those that responded).

Figure 2: Climate change impact

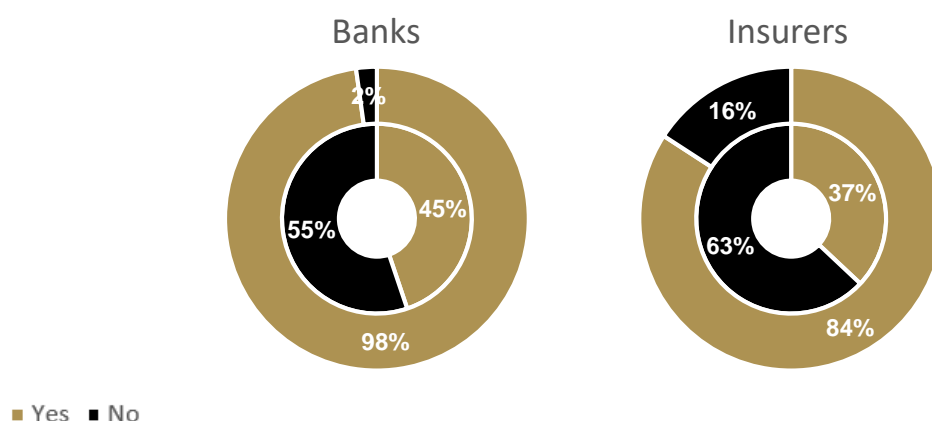


A significant percentage of both the banking and insurance industry believes climate change would affect their business. This is in line with views around the world and it is thus important to fine-tune our understanding of how our banks and insurers would be

impacted. The reporting of relevant information internally and externally can assist in increasing this understanding from various stakeholders' point of views.

The graphs below show the number (inner circle) and size (outer circle) of industry participants who are already reporting on information relating to climate change.

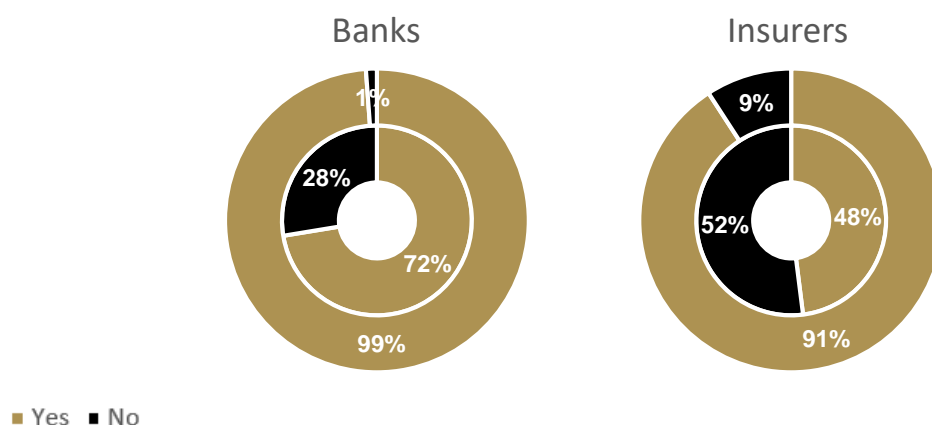
Figure 3: Reporting



It can be noted that all the large players in each of these industries indicate that they already report on information relevant to climate change. However, this ranges from very simplistic and limited reporting to very extensive, complex and comprehensive reporting. Most of the information is also only distributed internally as opposed to being disclosed to external stakeholders. Most small insurers and banks were currently not reporting at all even though they did believe that climate change would affect their business. This was mostly due to a lack of awareness as well as constraints on resources available to conduct impact assessments and establish reporting frameworks.

The graphs below show the number (inner circle) and size (outer circle) of industry participants who were aware of the TCFD recommendations.

Figure 4: TCFD Awareness



Most banks and larger insurers were aware of the TCFD recommendations. The survey has hopefully created awareness amongst those smaller players within each of the industries. Even though there was a high level of awareness, very few institutions were currently disclosing TCFD-relevant information as part of their annual reporting. A number of insurers and banks have indicated that they were very interested in the TCFD recommendations and would be conducting assessments to see how the relevant information could be disclosed in future.

Reporting relevant and useful information is not only important from an internal point of view but also helps to increase transparency from the outside looking in. Banks and insurers were key players in our reputable financial system that has been built on trust, transparency and expertise. This financial system is integrated into the wider economy and the environment. Therefore it behooves each financial institution to not only understand its own risks, but also the risks its actions bring to the financial sector, wider economy and the environment. The TCFD recommendations are tools that could be used to enhance this understanding by providing a standardised framework for reporting on climate-related information.

3. Results

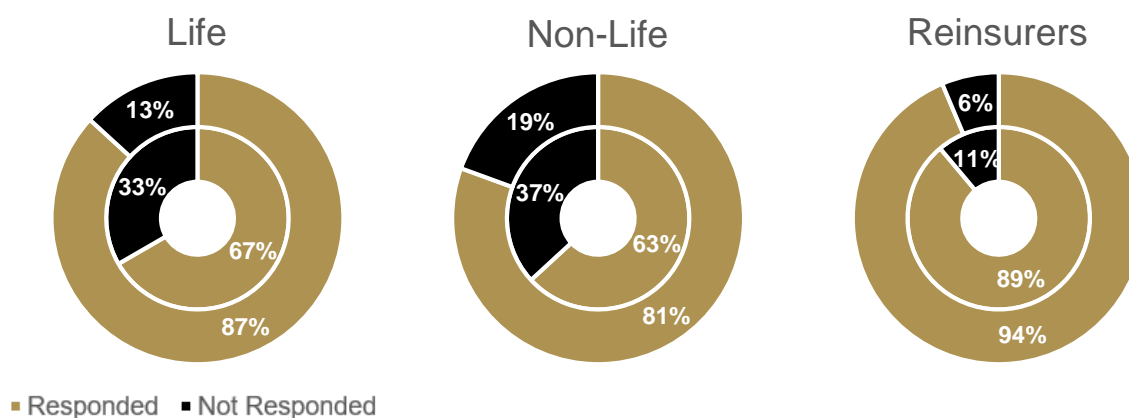
The results below were shown as per the questions in the surveys in Annexure A and Annexure B and are numbered correspondingly.

a. South African Insurance Industry

Response Rate

The voluntary survey was sent to all registered and operationally active insurers in South Africa. The graphs below show the response rate by number of insurers (inner circle) and asset size (outer circle).

Figure 5



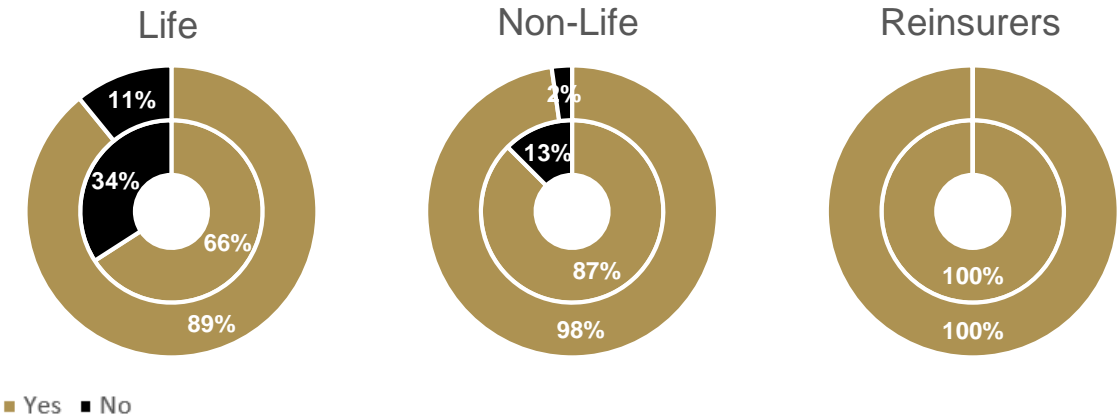
The survey attracted a strong response rate from the insurance industry in terms of numbers and even more so in terms of size. This not only shows the interest in the topic of climate change but also provided a more comprehensive set of results in terms of insurance industry coverage.

Question 3:

Does your organisation (or group) expect that climate change will affect your business?

The graphs below show the response in terms of number of insurers (inner circle) and asset size (outer circle) (i.e. based on those that responded).

Figure 6



It was expected that non-life insurers, and reinsurers in general, would be more likely to indicate that climate change would affect their business. These types of insurers have been instrumental in mitigating financial risk to policyholders, both personal and commercial, as a result of extreme weather events (e.g. earthquakes, floods, hailstorms) for many years.

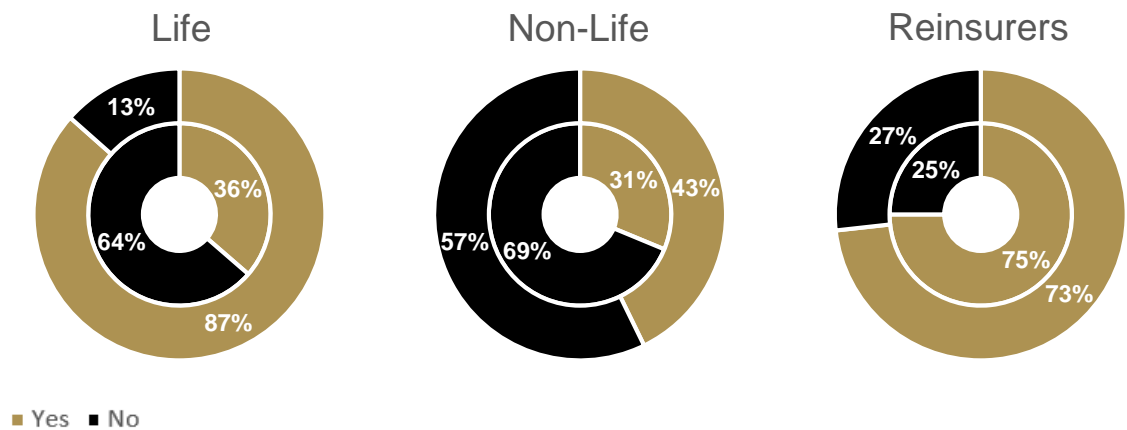
In terms of the insurance market as a whole, most insurers believed they would be affected by climate change, which gives substance to the increased efforts to understand how the effect would materialise in terms of risk profiles, business strategies and new opportunities.

Question 4:

Does your organisation (or group) already report (internally and/or externally) information relevant to climate change impacts?

The graphs below show the response in terms of number of insurers (inner circle) and asset size (outer circle).

Figure 7



It is unsettling to note how many insurers did not report information relevant to climate change either internally and/or externally, even though they did believe that climate change would affect their business. This might be due to the perception that climate change would not have a significant impact on their business model or because it has not yet been perceived as a priority to create reporting frameworks that could provide meaningful information to support business decisions and inform business planning and strategy.

The response rate from the non-life sector was particularly perturbing, as non-life insurance business is directly affected by the physical risks from climate change.

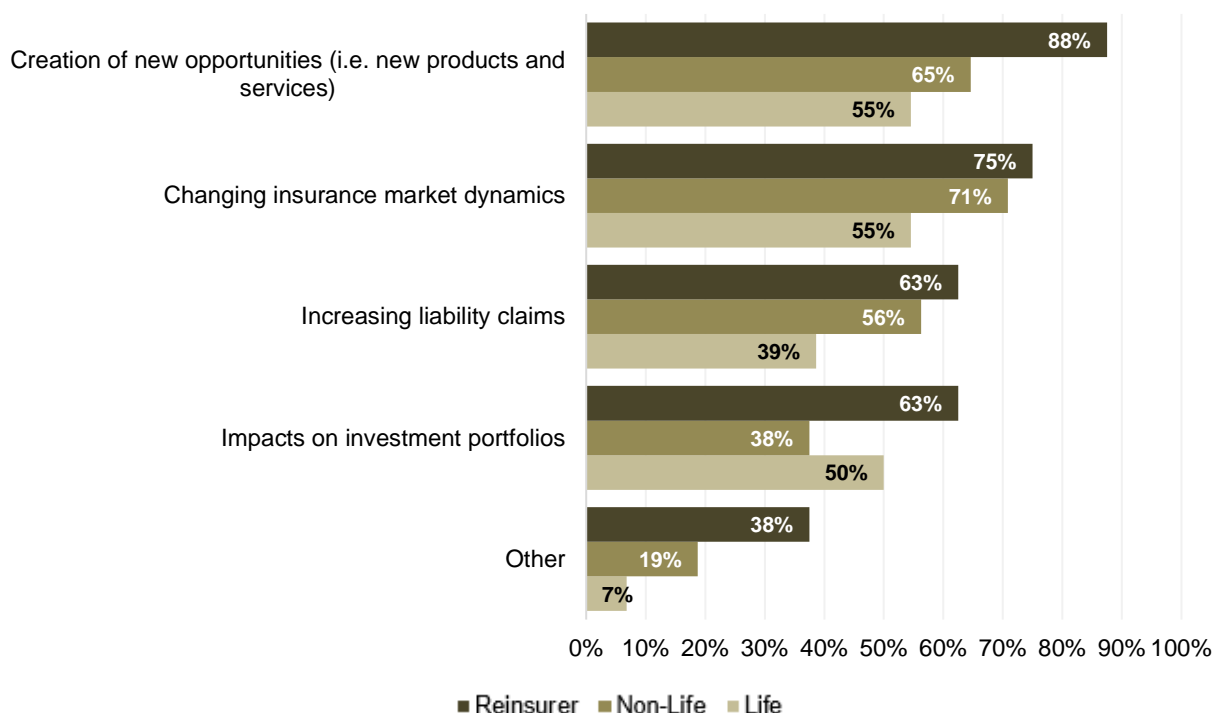
The larger insurers, both from a life and non-life perspective, seem to be rather more active in this area, which is to be expected given their resources. Most reinsurers also has the added advantage of international exposure coming from their parent entities.

Question 5:

Indicate which of the following areas, according to your organisation, are expected to be affected by climate change:

The graph below shows the areas insurers believe to be affected by climate change.

Figure 8



It is encouraging to see how many insurers indicated that climate change would create new opportunities for the insurance sector. The transition to a low-carbon economy would most probably result in various new opportunities (i.e. products and services) and the creation of suitable products would be very important in driving this transition forward. The fact that insurers selected most of the categories above, indicates the potential widespread effect of climate change on the insurance sector.

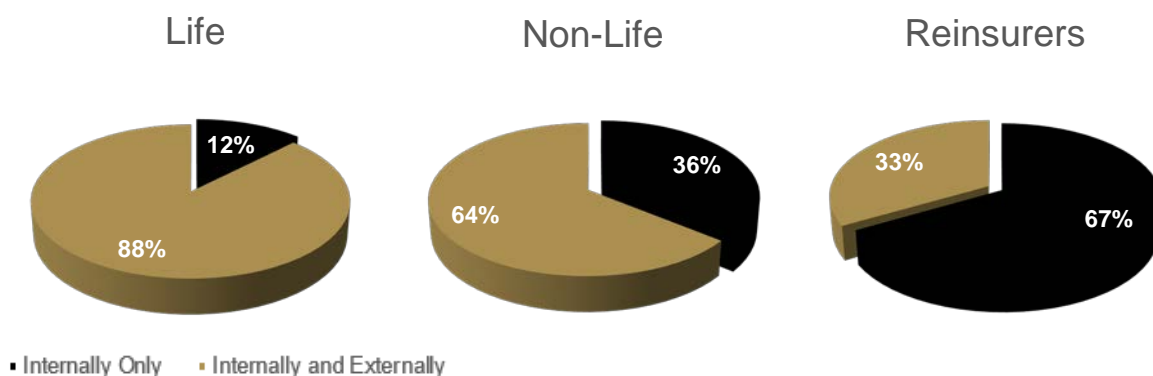
A large number of life insurers indicated that climate change would have an impact on investment portfolios. This is a key insight and requires increased attention from life insurers in order to increase the resiliency of their investment portfolios against transition risks.

Question 6:

Is the information reported:

The graphs below show the response in terms of number of insurers.

Figure 9



Most of the insurers that already report on climate change information, did so both internally and externally. The next question provides more information on the types of information that is reported on.

Question 7:

Please explain the manner in which information is reported and provide links where publicly available.

Insurers indicated a variety of channels through which climate-related information is reported both externally and internally. The list below is split between internal and external channels and includes some examples in no particular order of importance:

- Internal
 - Own Risk and Solvency Assessments (ORSAs)

ORSAs seem to be the most widely used channel through which climate-related information is reported. It is probably one of the best ways in which an insurer could provide information to decision-makers and those responsible for strategy formulation within the institution as well as to the supervisory authorities. Currently, climate risks were mostly considered under the emerging risk section of the ORSA reports.
 - Discussed at various internal committees

Climate-related information is discussed at various committees such as the Board, Executive Committee, Risk Committee and/or Social and Ethics committee.
 - Risk registers

Insurers have added some risk categories for climate change on their risk registers in order to keep track of the development thereof.

- Climate-related information is also discussed in claims and underwriting processes, especially where weather-related reports were considered for specific risks.
- Internal white papers, research papers and/or questionnaires were also used.
- External
 - Annual Financial Reports or Sustainability reports
Various insurers indicated that they did report some information related to climate change in their annual reports or in specific sustainability reports. Although the information might not yet be fully aligned to the TCFD recommendations, it is a heartening effort by insurers as responsible role-players in the financial system.
 - Carbon Disclosure Project (CDP)⁴ submissions
The CDP is a not-for-profit charity that runs the global disclosure system for investors, companies, cities, states and regions to manage their environmental impacts. More information on this project could be found by following the link provided in a footnote.
 - Principles for Responsible Investment (PRI)⁵ submissions
The PRI is an independent organisation that works to understand the investment implications of environmental, social and governance (ESG) factors and to support its international network of investor signatories in incorporating these factors into their investment and ownership decisions.
 - ClimateWise⁶ submissions
ClimateWise supports the insurance industry to improve the communication, disclosure and responses to the risks and opportunities associated with the climate-risk protection gap.
 - Due diligence and/or tender documents

⁴ <https://www.cdp.net>

⁵ <https://unpri.org/pri>

⁶ <https://cisl.cam.ac.uk>

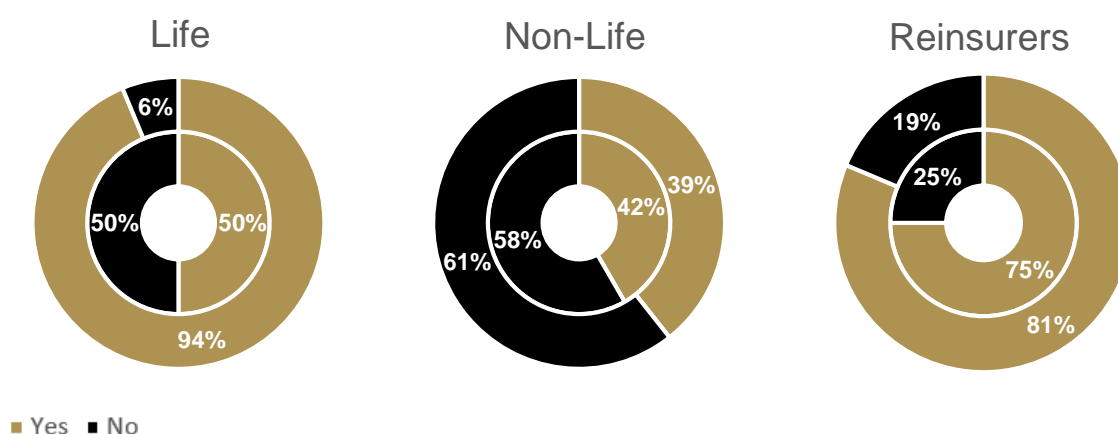
Some insurers also include climate-related information in due diligence reports as well as tender documents, which can help in forging sustainable and responsible partnerships.

Question 8:

Is your organisation (or group) aware of the Recommendations and Supplemental Guidance of the TCFD?

The graphs below show the response in terms of number of insurers (inner circle) and asset size (outer circle).

Figure 10



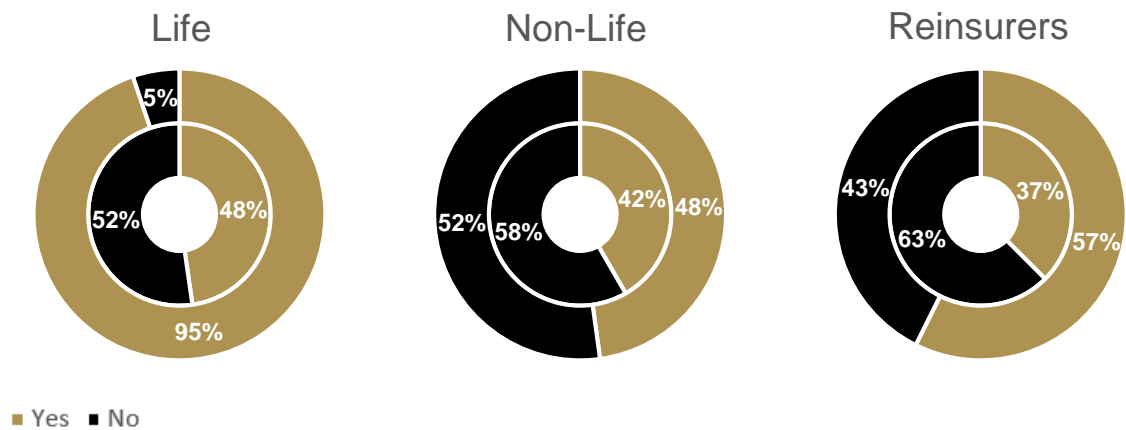
Even though some insurers were aware of the TCFD recommendations, they have not yet started incorporating them into either internal or external reporting. Most of the largest life insurers were aware of the TCFD recommendations and have indicated that they already report on information relating to climate change. Most of the non-life insurers were not aware of the TCFD recommendations and may have found this survey an apposite wake-up call.

Question 9:

Is your organisation (or group) aware of the 2018 Status Report of the TCFD?

The graphs below show the response in terms of number of insurers (inner circle) and asset size (outer circle).

Figure 11



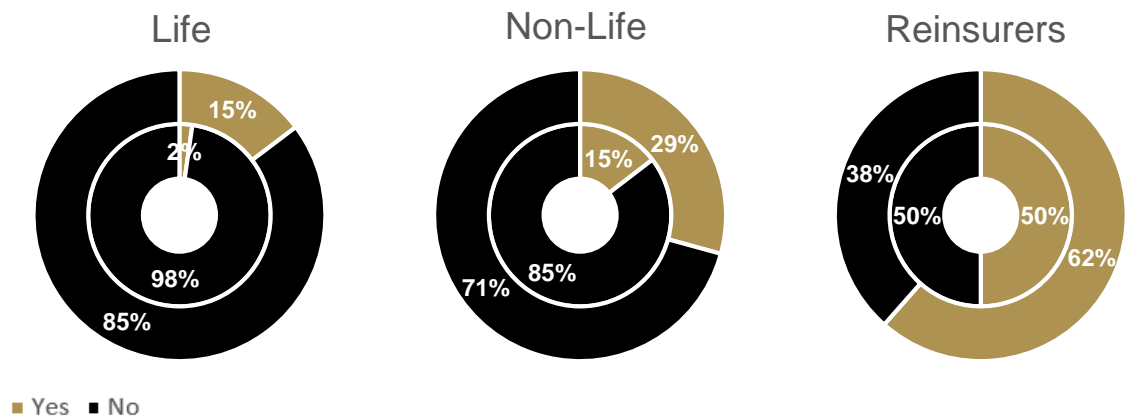
Almost all of the insurers that were aware of the TCFD recommendations, were also aware of the 2018 status report. Some reinsurers did not follow TCFD that closely as they were not aware of the 2018 status report although. They were, however, aware of the TCFD recommendations.

Question 10:

Has your organisation (or group) made plans to, or already taken steps to implement the TCFD Recommendations and deliver TCFD-aligned disclosures?

The graphs below show the response in terms of number of insurers (inner circle) and asset size (outer circle).

Figure 12



Very few life and non-life insurers indicated that they had made plans to implement the TCFD recommendations. Most of these insurers were unaware of the TCFD recommendations before this survey and stated that they might investigate how this

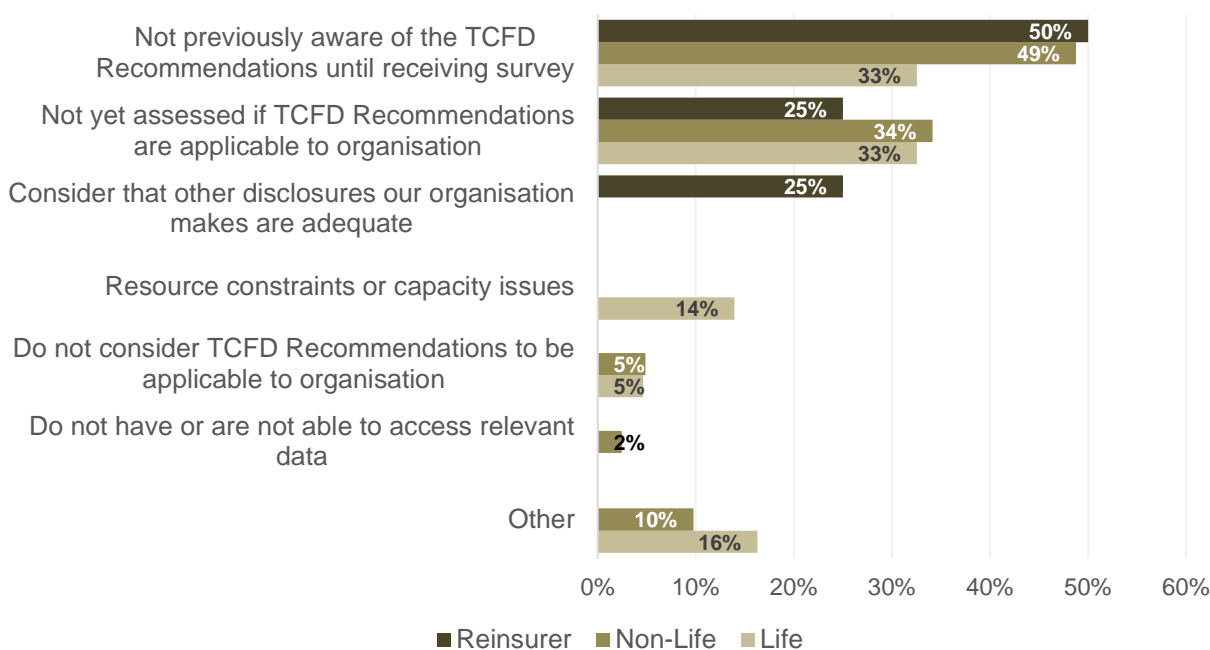
could be applied and add value in future. Others had started the reporting journey but did not yet have their information fully aligned to the TCFD recommendations.

Question 11:

Why has your organisation (or group) not taken steps to implement the TCFD?

The graph below expresses the response as the number of participants who selected each category, as a percentage of the total number of participants who have not yet taken steps to implement the TCFD recommendations.

Figure 13



Those insurers who had not taken steps to implement the TCFD recommendations, indicated that they were not previously aware of this framework. Some insurers had not yet assessed whether the framework was applicable to them. A very small number of insurers indicated that they did not have access to the relevant data. Moreover, insurers who were unaware of the TCFD recommendations might not have considered the data elements necessary to conduct meaningful analyses that could be used for decision-making purposes.

Question 12:

Please explain why your organisation (or group) does not consider the TCFD Recommendations applicable.

A few insurers indicated that they did not consider the TCFD recommendations relevant to the type of business they write. These insurers write mostly credit life, legal or guarantee business and believe that these products would not be impacted by climate change.

Question 13:

Please explain how other disclosures are adequate in the context of the TCFD Recommendations

It was indicated that the results from models used for assessing risk within and across portfolios, already implicitly cater for climate change and that it would not be necessary to have additional specific reporting on climate change.

Question 14:

Under what circumstances would your organisation (or group) consider implementing the TCFD Recommendations?

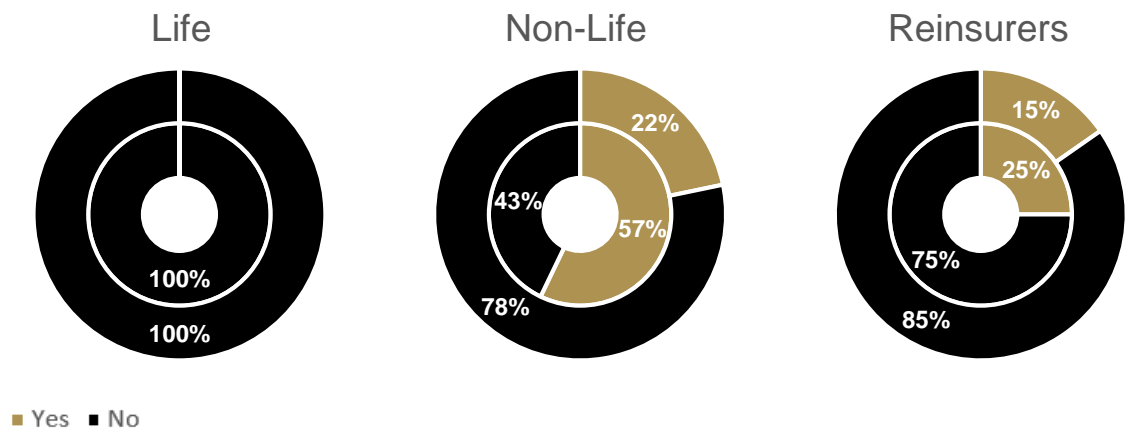
Most insurers indicated that they needed to first assess the appropriateness of the TCFD recommendations before they would consider its implementation. Various insurers also indicated that they would like to investigate and understand the implications of these disclosures before acting on them. Some insurers would likely implement these disclosures as soon as they became industry best practice and some indicated that they would like to implement the TCFD disclosures as soon as possible.

Question 15:

Has your organisation (or group) released TCFD-aligned disclosures for Financial Year 2017 or 2018 (whichever is the latest)?

The graphs below show the response in terms of number of insurers (inner circle) and asset size (outer circle).

Figure 14



The graphs above show the results only for those insurers that had already indicated that they had already made plans to implement TCFD recommendations. Only one life insurer indicated that it had already taken steps to implement TCFD recommendations - but it had not yet released anything as part of their recent financial disclosures. There were seven non-life insurers that had taken steps to implement and four which had already done so as part of their recent financial disclosures. There could have been different interpretations on what was meant by “TCFD-aligned” (i.e. how close disclosures were aligned to what TCFD recommends).

Question 16:

Indicate the form in which these disclosures were made:

Most of the TCFD-relevant information was released as part of the annual financial report. One insurer indicated that they disclosed through a stand-alone report while another had done so through other external submissions as discussed in question 7 above.

Question 17:

Indicate whether your organisation’s (or group’s) TCFD-aligned disclosures contain the information relating to the TCFD Recommended Disclosures, and the nature of this information:

The table below expands on the disclosures made by insurers as per question 15 above.

Table 1

Number of Respondents (5)	Quantitative	Qualitative	None
Governance	1	4	1
Strategy	1	5	0
Risk Management	2	4	1
Metrics and Targets	4	4	1

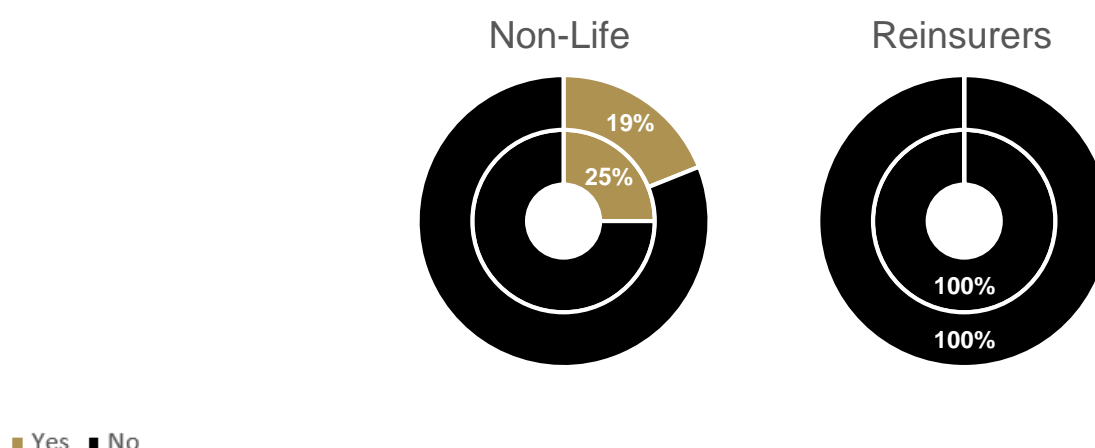
Where disclosures were made, they related to most of the areas in the table above. As expected, insurers disclosed both quantitative and qualitative information on metrics and targets. Disclosures relating to governance and strategy were mostly qualitative. One insurer only disclosed information relating to its strategy and it was only qualitative in nature.

Question 18:

Do your organisation's (or group's) TCFD-aligned disclosures contain forward-looking information/ analysis, such as the results of scenario analysis?

The graphs below show the response in terms of number of insurers (inner circle) and asset size (outer circle). Note that no life insurers had ever before released TCFD-aligned disclosures.

Figure 15



Only one non-life insurer indicated that they disclose forward-looking information as part of their TCFD-aligned disclosures. Scenario analysis and stress testing relating to

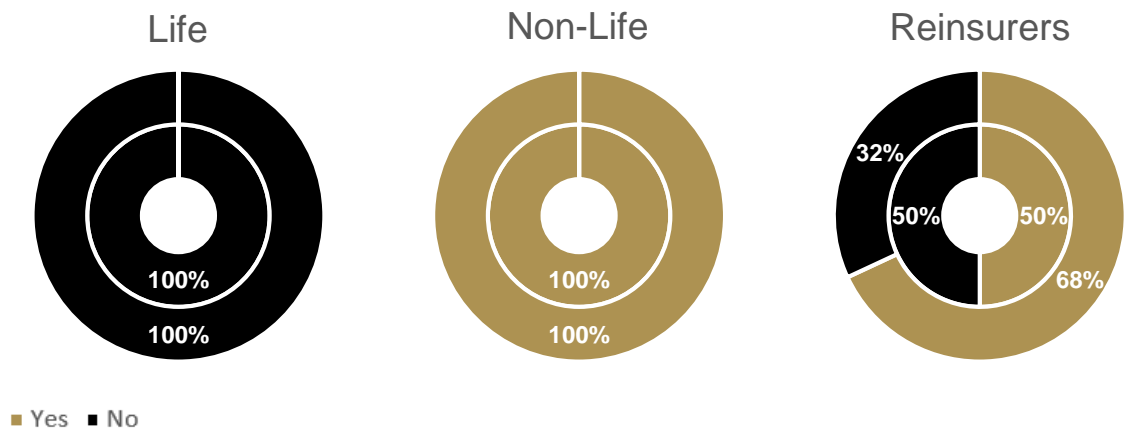
climate change remain two of the least explored areas and would require accelerated efforts in order to better understand the long-term impact of climate change.

Question 19:

Is your organisation (or group) planning to release TCFD-aligned disclosures for your next financial year?

The graphs below show the response in terms of number of insurers (inner circle) and asset size (outer circle).

Figure 16



All seven of the non-life insurers who had made plans to implement TCFD recommendations, planned to do so in their next financial year (although four indicated that they had already done so). None of the life insurers indicated that they were planning to release information for their next financial year. One of the reinsurers that had not previously disclosed any TCFD-related information, was planning to do so in future.

Question 20:

What types of disclosures from investee entities or insureds are useful for your organisation's (or group's) efforts to conduct analysis of climate-related risks and opportunities?

Transition plans, risk assessments, publications on emissions data as well as metrics and targets were among the most useful disclosures that help insurers conduct analyses on climate-related risks and opportunities. These disclosures did not just better their understanding of these risks but provide useful inputs into strategies around partnerships and business models as well as new products and services. Geocoding

of risk locations would also help with the assessment of concentration risk, especially in vulnerable areas.

Question 21:

What are the key challenges that your organisation (or group) has faced in its efforts to enhance disclosure of information relating to climate-related factors?

Some of the key challenges revealed, were the lack of a shared understanding of climate change within the institutions, its importance from a strategic and risk management point of view and the low priority given in terms of capital allocations to help drive initiatives forward. An institution needs to have buy-in from the most senior role-players within the institution, including senior management and the board, in order to make progress in its understanding of climate-related risks and the potential impact this might have on its business model and strategy. This buy-in would mean the allocation of sufficient resources, such as time and capital as well as the necessary skills, to make significant progress and propel internal initiatives forward. Some institutions might not have made adequate progress as they had not yet seen resource allocation as a priority.

Another important factor mentioned was a lack of industry best practice or standardised key metrics and performance indicators. Most insurers still find it difficult to quantify various aspects of climate-related risks and have not yet designed appropriate scenario and stress testing models.

Question 22:

What are the key challenges that your organisation (or group) has experienced in developing a TCFD report? If your organisation (or group) has yet to develop a TCFD report, what are the key challenges your organisation (or group) foresee in trying to develop a TCFD report?

Some answers were in line with the explanations given above. In addition, insurers indicated that they find it difficult to obtain relevant information from their clients and suppliers which make it difficult for them to understand the impacts that climate change would have on their business, especially on their supply chains. This is also due to pending climate legislation and the shift to a low-carbon economy, both from a local and global perspective. The speed at which the latter would happen, is difficult to estimate.

There is a lack of climate risk modelling guidelines for the non-life insurance industry and most insurers did not have the tools yet to assess transition risk, which up to now has received the least attention. Setting appropriate science-based and business-relevant metrics and targets seems to be quite difficult, both from a life and non-life perspective.

Question 23:

What are the key benefits achieved for your organisation (or group) through releasing TCFD-relevant disclosures? If your organisation (or group) has yet to release TCFD-relevant disclosures, what are the benefit your organisation (or group) foresee when releasing such disclosures.

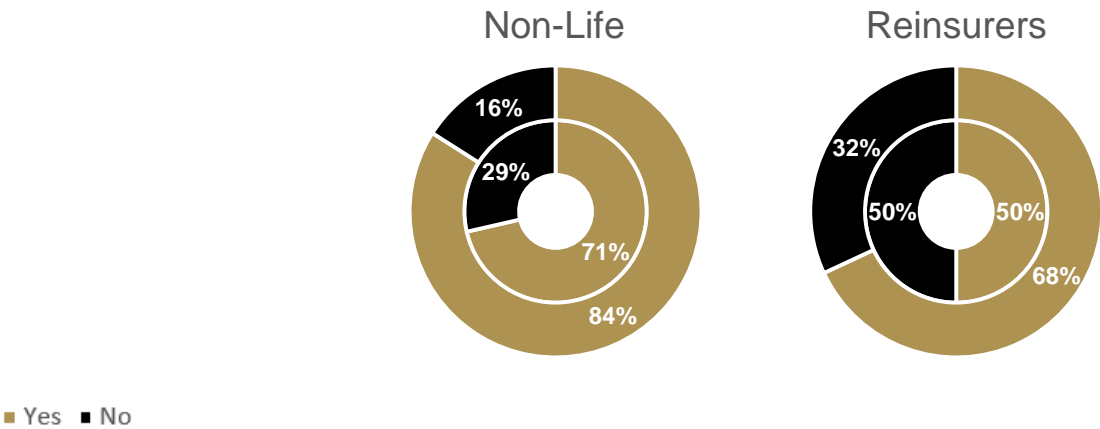
Releasing TCFD-relevant disclosures would enhance insurers' risk management practices that could inform prudent business planning and financial planning cycles. This could ultimately contribute to sounder strategy development and execution. A better understanding of the climate-risk landscape would inform work-around opportunities and the creation of new products and services. Insurers would also be able to make educated decisions on investment activities and provide its stakeholders with the same.

Another important aspect is the enhancement of risk mitigation and forward-looking risk management strategies. All of these were crucial from a reputational risk perspective where forward-looking and well-informed strategic thinking could enhance an insurer's profile and increase its resiliency in terms of sustainability.

Question 24: Has your organisation sought to take action on the basis of your TCFD reporting process?

The graphs below show the response in terms of number of insurers (inner circle) and asset size (outer circle). Note that no life insurers have ever released TCFD-aligned disclosures before.

Figure 17



The above graphs show the responses from those insurers that have indicated that they have taken steps to implement the TCFD recommendations. Most of the respondents indicated that they sought to take action on the basis of their TCFD reporting process.

Question 25: Indicate how your organisation has sought to take action on the basis of your TCFD reporting process?

The table below expands on this question and shows the types of actions that insurers would take on the basis of their TCFD reporting process. Insurers were able to select as many actions as they considered applicable.

Table 2

Type of Action	Number of Respondents (5)
Initiating dialogue with investee companies on TCFD information	2
Implementing changes to underwriting risk management or practices	3
Implementing changes to investment risk management or practices	2
Engaging with public authorities (i.e. supervisors and regulators)	3
Other	4

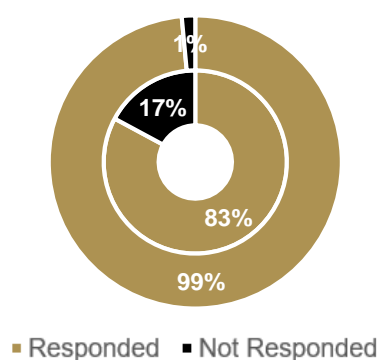
Some insurers indicated that they still needed to do further work before deciding which of these actions to take. However, most insurers indicated some action as a result of their TCFD reporting process.

b. South African Banking Industry

Response Rate

The voluntary survey was sent to all registered banks in South Africa. The graph below shows the response rate in terms of number of banks (inner circle) and asset size (outer circle).

Figure 18



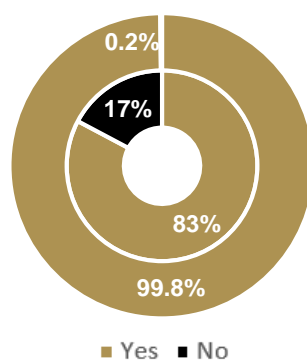
It can be noted from the graph above that the survey attracted a strong industry response rate in terms of numbers and even more so in terms of size. Not only did this show the interest in the topic of climate change from a banking perspective but it also provided a more comprehensive view on the survey questions.

Question 2:

Does your organisation expect that climate change will affect your business?

The graph below shows the response in terms of number of banks (inner circle) and asset size (outer circle).

Figure 19



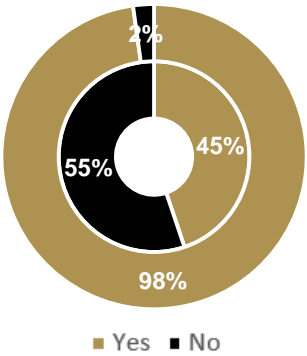
Most banks, including the five largest banks, believed that climate change would affect their business in some way. Seventeen percent of banks did not expect any effect from climate change on their business models. This might be due to a lack of awareness or that climate change has not been a priority for smaller banks over the recent years. Climate change might not impact all organisations directly but it was expected that there might be indirect impacts which would be worth exploring.

Question 3:

Does your organisation already report (internally and/or externally) information relevant to climate change impacts?

The graph below shows the response in terms of number of banks (inner circle) and asset size (outer circle) (i.e. based on those that responded).

Figure 20



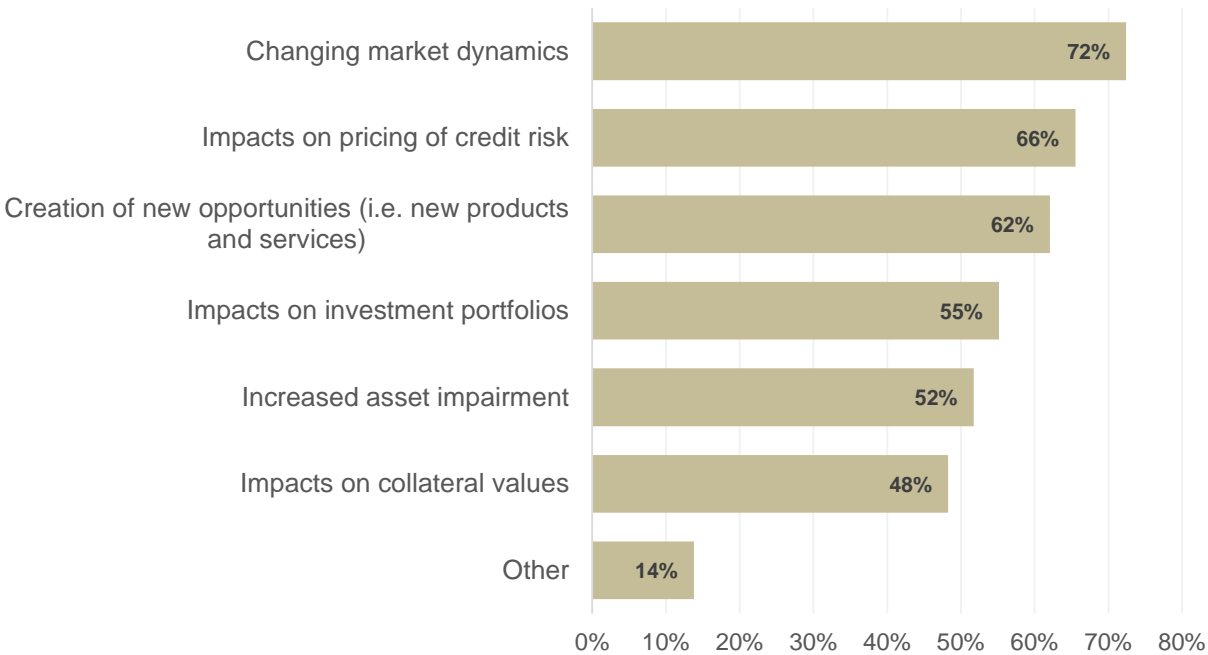
The largest banks already reported information relating to climate change. There was still a large portion of the smaller banking sector that did not currently report on climate-related information even though they believed they would be affected.

Question 4:

Indicate which of the following areas, according to your organisation, are expected to be affected by climate change:

The graph below shows the areas banks believed to be affected by climate change (more than one option could be selected).

Figure 21



The figure above shows that banks would be affected in various ways across their business models, which indicated the widespread impact of climate change. There was a strong belief that market dynamics would change. Sixty-six percent of banks indicated that climate change would have an impact on the pricing of credit risk. Furthermore, it was expected that the transition to a low carbon economy could have significant impacts on the economy and the financial wellbeing of individuals and organisations. These impacts may lead to significant credit losses if not managed carefully. Investment portfolios and asset impairments could also be impacted as some assets in certain industries may lose significant value over time.

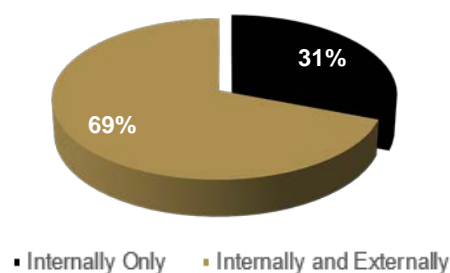
It was encouraging to see that banks also realise the new opportunities that will arise (i.e. opportunities for new products and services). These new opportunities will not only help drive climate change initiatives forward but will make the banking sector more sustainable in the future.

Question 5:

Is the information reported:

The graph below shows the response in terms of number of banks.

Figure 22



Sixty-nine percent of banks that already report on information relating to climate change have done so both internally and externally. Internal reporting does not only create awareness but it could assist decision-makers within the institution to have a better understanding of the risk landscape in order to make better-informed decisions both operationally and strategically.

Question 6:

Please explain the manner in which information is reported and provide links where publicly available.

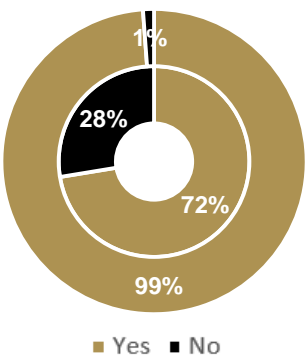
Information integrated into annual reports and stand-alone sustainability reports seem to be the most favourable channels currently used. From an internal perspective, banks were using existing governance and risk management structures to report appropriate information to the relevant decision-making bodies within the institution.

Question 7:

Is your organisation aware of the Recommendations and Supplemental Guidance of the TCFD?

The graph below shows the response in terms of number of banks (inner circle) and asset size (outer circle).

Figure 23



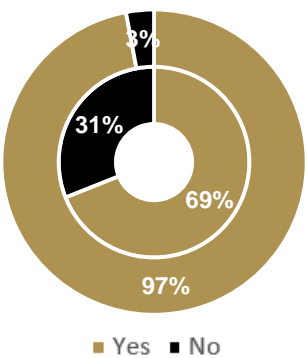
A large number of banks (72%) were aware of the TCFD recommendations which again show the interest in the climate change topic. However, most of these banks have not yet assessed whether the recommendations were applicable to them.

Question 8:

Is your organisation aware of the 2018 Status Report of the TCFD?

The graph below shows the response in terms of number of banks (inner circle) and asset size (outer circle).

Figure 24



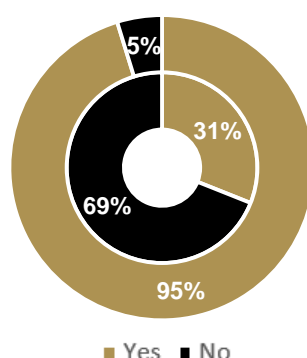
Most of those banks that were aware of the TCFD recommendations, were also aware of the status report and showed an ongoing interest in the development of the TCFD recommendations. Some banks stated that they might track the progress of the recommendations to decide whether they should follow suit.

Question 9:

Has your organisation made plans to, or already taken steps, to implement the TCFD Recommendations and deliver TCFD-aligned disclosures?

The graph below shows the response in terms of number of banks (inner circle) and asset size (outer circle).

Figure 25



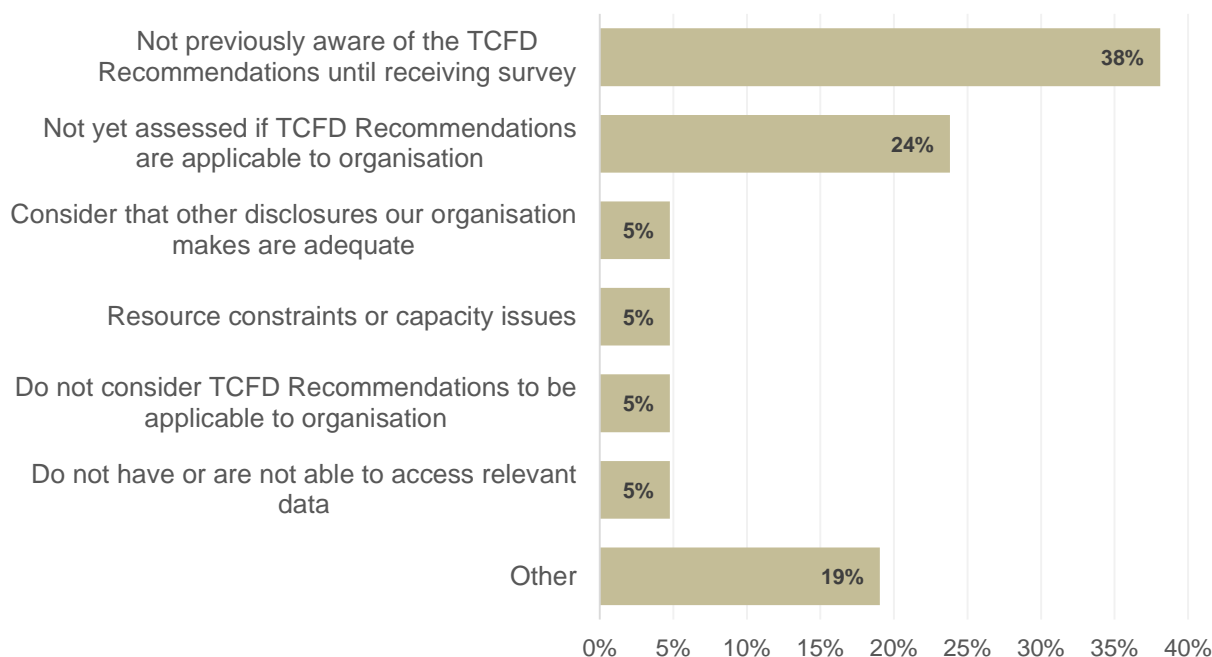
Although banks were mostly aware of the TCFD recommendations, they were not yet making plans to implement them. Several banks that already report information relating to climate change, have made plans to align it to the TCFD recommendations. The largest banks were all planning to implement the recommendations.

Question 10:

Why has your organisation not taken steps to implement the TCFD?

The graph below shows the reasons why some banks have not yet taken steps to implement the TCFD recommendations. It expresses the response as the number of participants who selected each category, as a percentage of the total number of participants who have not yet taken steps to implement the TCFD recommendations.

Figure 26



Most banks that have not made plans to implement the TCFD recommendations, indicated that before the survey they had not known about them. Some of those that had known, have not yet assessed whether the recommendations were applicable to their institutions. Some banks indicated that they did not see climate change having an impact on their business model within the next 5 to 10 years.

Question 11:

Please explain why your organisation (or group) does not consider the TCFD Recommendations applicable.

One bank indicated that they did not consider the recommendations relevant as their product offering was extremely uncomplicated.

Question 12:

Please explain how other disclosures are adequate in the context of the TCFD Recommendations.

One bank indicated that its current disclosures, although not TCFD-aligned, were somewhat adequate and that a further detailed analysis was required before these disclosures could be deemed fully adequate.

Question 13:

Under what circumstances would your organisation (or group) consider implementing the TCFD Recommendations?

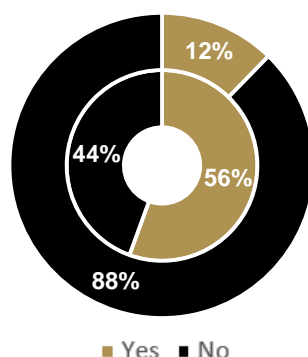
Some banks indicated that they would like to do further assessments on the applicability of the TCFD recommendations to their business model. They would also need to perform a cost-benefit analysis as well as an assessment on institutional capacity before they could implement the recommendations. Almost all banks have at least indicated that the TCFD recommendations were worth exploring.

Question 14:

Has your organisation released TCFD-aligned disclosures for Financial Year 2018?

The graph below shows the response in terms of number of banks (inner circle) and asset size (outer circle).

Figure 27



Fifty-six percent of those banks that indicated plans to implement the TCFD recommendations (Figure 25 above) have released TCFD-aligned disclosures for their 2018 financial year. There could be various different interpretations on what “TCFD-aligned” means. These TCFD-aligned disclosures could range from very simplistic and limited reporting to very extensive, complex and comprehensive reporting.

Question 15:

Indicate the form in which these disclosures were made:

The most common channel for the TCFD-aligned disclosures were for them to be included in sustainability reports. One bank indicated that they disclosed information using a stand-alone TCFD-focused report. There were also disclosures made as part of annual financial statement reports and investor presentations.

Question 16:

Indicate if your organisation's TCFD-aligned disclosures contain the information relating to the TCFD Recommended Disclosures, and the nature of this information:

The table below shows a breakdown of the TCFD-aligned information some banks are already reporting on.

Table 3

Number of Respondents (5)	Quantitative	Qualitative	None
Governance	3	5	0
Strategy	3	5	0
Risk Management	2	5	0
Metrics and Targets	5	4	0

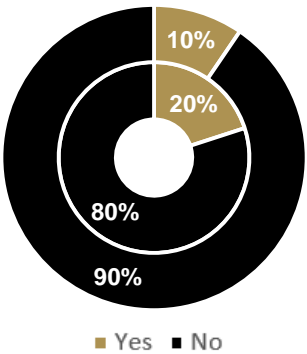
All the areas above are covered by those banks that already report on TCFD-aligned information. The majority of information is qualitative in nature although some banks have already included quantitative information as well.

Question 17:

Do your organisation's TCFD-aligned disclosures contain forward-looking information/analysis, such as the results of scenario analysis?

The graph below shows the response in terms of number of banks (inner circle) and asset size (outer circle).

Figure 28



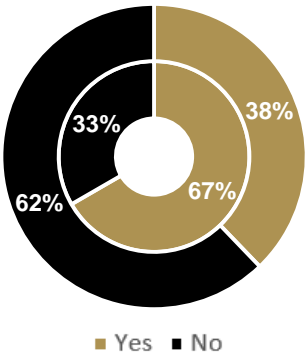
Only a few banks indicated that their disclosures contain forward-looking information which has only revealed the immaturity of climate-related stress testing and scenario modelling. There might be banks that already conduct these types of modelling internally but which were not yet comfortable to share this publicly.

Question 18:

Is your organisation planning to release TCFD-aligned disclosures for financial year 2019?

The graph below shows the response in terms of number of banks (inner circle) and asset size (outer circle).

Figure 29



Sixty-seven percent of those banks that indicated plans to implement the TCFD recommendations would like to release TCFD-relevant information as part of their next financial year. It includes those that have already done so in 2018 as well as one additional bank.

Question 19:

What types of disclosures from other entities are useful for your organisation's efforts to conduct analysis of climate-related risks and opportunities?

Disclosures of environmentally sustainable practices, climate strategies and risk management/mitigation strategies are amongst some of the most useful information used by banks. Some banks indicated that they found reports issued as part of the Carbon Disclosure Project very useful together with various other publications on climate change from the Financial Stability Board⁷, United Nations Environment Programme⁸, ClimateWise and other international bodies such as the International Energy Agency⁹.

Question 20:

What are the key challenges that your organisation has faced in its efforts to enhance disclosure of information relating to climate-related factors?

A general lack of awareness in the industry around climate change and how it would impact business models, was one of the key challenges faced by banks. Some banks were also not sure to what extent they needed to incorporate this into their business strategy. A further complication was that different stakeholders had different expectations on climate-related disclosures, and a lack of standardisation in terms of data and taxonomies makes disclosures even more difficult.

Another challenge was the lack of international and local frameworks or guidance providing standardised methodologies, definitions and scenarios which could help banks disclose appropriately. Scenario analyses and stress testing remain some of the areas that are still in their infancy when it comes to the assessment of climate risks.

Some banks indicated that access to appropriate and relevant good quality data was often difficult. Coupled with the lack of appropriate skills and limitations on time and

⁷ <https://www.fsb.org>

⁸ <https://www.unenvironment.org>

⁹ <https://www.iea.org>

financial resources, these were all contributing factors to the slow adaptation of climate-related disclosures.

Question 21:

What are the key challenges that your organisation has experienced in developing a TCFD report? If your organisation has yet to develop a TCFD report, what are the key challenges your organisation foresee in trying to develop a TCFD report?

Most of these challenges were the same as those covered under the previous question. In addition, the quantification of certain risks associated with climate change was challenging, given the long-term nature of the assumptions in forecasting models. Access to sufficient and reliable data from clients remained a challenge and this was an important input into the analyses needed for the TCFD report. For small institutions, it was often difficult to obtain all the information necessary for a TCFD report due to constraints on resources and skills.

Question 22:

What are the key benefits achieved for your organisation through releasing TCFD-relevant disclosures? If your organisation has yet to release TCFD-relevant disclosures, what are the benefit your organisation foresee when releasing such disclosures.

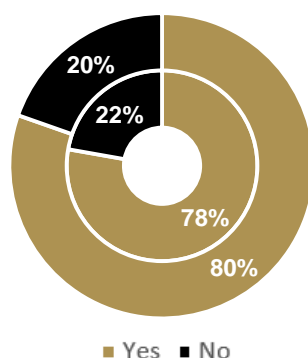
TCFD was considered a very valuable and useful framework for raising awareness around climate change risks and opportunities. It increased transparency and could help stakeholders (e.g. investors) gain insights into institutions' strategies and business models.

Internally, organisations would be able to have better insights into their risk profiles and how these might be impacted by emerging climate-related risks over time. It was not only important from a risk management point of view but also crucial in making strategic decisions. The framework could also assist organisations with their data collection practices and help improve not only the quality but also the relevance of data collection necessary for operational and strategic purposes.

Question 23: Has your organisation sought to take action on the basis of your TCFD reporting process?

The graph below shows the response in terms of number of banks (inner circle) and asset size (outer circle).

Figure 30



Most banks already reporting on climate-related information indicated that they sought to take action based on their TCFD reporting process.

Question 24: Indicate how your organisation has sought to take action on the basis of your TCFD reporting process?

The table below sets forth the types of action that banks would take on the basis of their TCFD reporting process. Banks were able to select as many actions as they considered applicable.

Table 4

Type of Action	Number of Respondents (7)
Initiating dialogue with investee companies on TCFD information	4
Implementing changes to credit risk appetite and tolerance levels	4
Implementing changes to investment risk management or practices	4
Engaging with public authorities (i.e. supervisors and regulators)	4
Other	3

It seems that banks would be open to considering most of these actions, depending on the situation and internal priorities.

4. Annexure A: Insurance Survey

SA Insurance Sustainability Survey 2019

Survey on implementation of the recommendations and guidance of the Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

*Required

1.

Select the name of your organisation *

Mark only one oval.

- ☐ 1 LIFE INSURANCE LIMITED
- ☐ 360 LIFE INSURANCE COMPANY LIMITED
- ☐ ABACUS INSURANCE LIMITED
- ☐ ABACUS LIFE LIMITED
- ☐ ABSA IDIRECT LIMITED
- ☐ ABSA INSURANCE COMPANY LIMITED
- ☐ ABSA INSURANCE RISK MANAGEMENT SERVICES LIMITED
- ☐ ABSA LIFE LIMITED
- ☐ AECI CAPTIVE INSURANCE COMPANY LIMITED
- ☐ AFRICAN REINSURANCE CORPORATION (SA) LIMITED
- ☐ AFRICAN UNITY LIFE LIMITED
- ☐ AGRe INSURANCE COMPANY LIMITED
- ☐ AIG SOUTH AFRICA LIMITED
- ☐ AIG LIFE SOUTH AFRICA LIMITED
- ☐ ALEXANDER FORBES INSURANCE COMPANY LIMITED
- ☐ ALEXANDER FORBES INVESTMENTS LIMITED
- ☐ ALEXANDER FORBES LIFE LIMITED
- ☐ ALLAN GRAY LIFE LIMITED
- ☐ ALLIANZ GLOBAL CORPORATE AND SPECIALTY SOUTH AFRICA LIMITED
- ☐ ASSUPOL LIFE LIMITED
- ☐ ATTORNEYS INSURANCE INDEMNITY FUND
- ☐ AURORA INSURANCE COMPANY LIMITED
- ☐ AUTO AND GENERAL INSURANCE COMPANY LIMITED
- ☐ BIDVEST INSURANCE LIMITED
- ☐ BIDVEST LIFE LIMITED
- ☐ BOPHELO LIFE INSURANCE LIMITED
- ☐ BRIGHTROCK LIFE LIMITED
- ☐ BRYTE INSURANCE COMPANY LIMITED
- ☐ BRYTE LIFE COMPANY LIMITED
- ☐ BRYTE RISK FINANCING LIMITED
- ☐ BUDGET INSURANCE COMPANY LIMITED
- ☐ CADIZ LIFE LIMITED
- ☐ CENTRIQ INSURANCE COMPANY LIMITED
- ☐ CENTRIQ LIFE INSURANCE COMPANY LIMITED
- ☐ CHANNEL LIFE LIMITED
- ☐ CHUBB INSURANCE SOUTH AFRICA LIMITED

- ☐ CLIENTELE GENERAL INSURANCE LIMITED
- ☐ CLIENTELE LIFE ASSURANCE COMPANY LIMITED
- ☐ COFACE SOUTH AFRICA INSURANCE COMPANY LIMITED
- ☐ COMMUNITY LIFE INSURANCE COMPANY LIMITED
- ☐ COMPASS INSURANCE COMPANY LIMITED
- ☐ CONSTANTIA INSURANCE COMPANY LIMITED
- ☐ CONSTANTIA LIFE & HEALTH ASSURANCE COMPANY LIMITED
- ☐ CONSTANTIA LIFE LIMITED
- ☐ CORONATION LIFE ASSURANCE COMPANY LIMITED
- ☐ CORPORATE GUARANTEE (SOUTH AFRICA) LIMITED
- ☐ CREDIT GUARANTEE INSURANCE CORPORATION OF AFRICA LIMITED
- ☐ DENSECURE SOC LIMITED
- ☐ DIAL DIRECT INSURANCE LIMITED
- ☐ DISCOVERY INSURE LIMITED
- ☐ DISCOVERY LIFE LIMITED
- ☐ ENPET AFRICA INSURANCE LIMITED
- ☐ ESCAP SOC LTD
- ☐ ETANA INSURANCE COMPANY LIMITED
- ☐ EXPORT CREDIT INSURANCE CORPORATION OF SOUTH AFRICA SOC LIMITED
- ☐ EXXARO INSURANCE COMPANY LIMITED
- ☐ FEDGROUP LIFE LIMITED
- ☐ FIRST CENTRAL INSURANCE LIMITED
- ☐ FIRST FOR WOMEN INSURANCE COMPANY LIMITED
- ☐ FIRSTSTRAND INSURANCE SERVICES COMPANY LIMITED
- ☐ FIRSTSTRAND LIFE ASSURANCE LIMITED
- ☐ FIRSTSTRAND SHORT TERM INSURANCE LTD
- ☐ FRANK LIFE LIMITED
- ☐ G4S INSURANCE LIMITED
- ☐ GENERAL REINSURANCE AFRICA LIMITED
- ☐ GENRIC INSURANCE COMPANY LIMITED
- ☐ GIC RE SOUTH AFRICA LIMITED
- ☐ GUARDRISK INSURANCE COMPANY LIMITED
- ☐ GUARDRISK LIFE LIMITED
- ☐ HANNOVER LIFE REASSURANCE AFRICA LIMITED
- ☐ HANNOVER REINSURANCE AFRICA LIMITED
- ☐ HDI GLOBAL SA LIMITED
- ☐ HOLLARD INSURANCE COMPANY LIMITED,THE
- ☐ HOLLARD LIFE ASSURANCE COMPANY LIMITED

- ☐ HOLLARD SPECIALIST INSURANCE LIMITED
- ☐ HOLLARD SPECIALIST LIFE LIMITED
- ☐ HOME LOAN GUARANTEE COMPANY NPC
- ☐ INDEQUITY SPECIALISED INSURANCE LIMITED
- ☐ INFINITI INSURANCE LIMITED
- ☐ INTERMEDIARIES GUARANTEE FACILITY LTD
- ☐ INVESTEC ASSURANCE LIMITED
- ☐ INVESTEC LIFE LIMITED
- ☐ JUST RETIREMENT LIFE (SOUTH AFRICA) LIMITED
- ☐ KGA LEWENS BEPERK
- ☐ KHULA CREDIT GUARANTEE (SOC) LIMITED
- ☐ KING PRICE INSURANCE COMPANY LIMITED
- ☐ LAND BANK INSURANCE SOC LIMITED
- ☐ LAND BANK LIFE INSURANCE COMPANY SOC LIMITED
- ☐ LEGAL EXPENSES INSURANCE SOUTHERN AFRICA LIMITED
- ☐ LIBERTY GROUP LIMITED
- ☐ LION OF AFRICA INSURANCE COMPANY LIMITED
- ☐ LION OF AFRICA LIFE ASSURANCE COMPANY LIMITED
- ☐ LLOYD'S SOUTH AFRICA (PTY) LTD
- ☐ LOMBARD INSURANCE COMPANY LIMITED
- ☐ METROPOLITAN LIFE INTERNATIONAL LIMITED
- ☐ MIWAY INSURANCE LIMITED
- ☐ MMI GROUP LIMITED
- ☐ MOMENTUM ABILITY LIMITED
- ☐ MOMENTUM ALTERNATIVE INSURANCE LIMITED
- ☐ MOMENTUM SHORT-TERM INSURANCE COMPANY LIMITED
- ☐ MOMENTUM STRUCTURED INSURANCE LIMITED
- ☐ MONARCH INSURANCE COMPANY LIMITED
- ☐ MUNICH REINSURANCE COMPANY OF AFRICA LIMITED
- ☐ MUTUAL & FEDERAL RISK FINANCING LIMITED
- ☐ NEDGROUP INSURANCE COMPANY LIMITED
- ☐ NEDGROUP LIFE ASSURANCE COMPANY LIMITED
- ☐ NEDGROUP STRUCTURED LIFE LIMITED
- ☐ NESTLIFE ASSURANCE CORPORATION LIMITED
- ☐ NETCARE LIFE LIMITED
- ☐ NEW ERA LIFE INSURANCE COMPANY LIMITED
- ☐ NEW NATIONAL ASSURANCE COMPANY LIMITED
- ☐ NMS INSURANCE SERVICES (SA) LIMITED
- ☐ NOVA RISK PARTNERS LIMITED

- ☐ NZALO INSURANCE SERVICES LIMITED
- ☐ OAKHURST INSURANCE COMPANY LIMITED
- ☐ OAKHURST LIFE LIMITED
- ☐ OAKLEAF INSURANCE COMPANY LIMITED
- ☐ OASIS CRESCENT INSURANCE LIMITED
- ☐ OLD MUTUAL ALTERNATIVE RISK TRANSFER LIMITED
- ☐ OLD MUTUAL ALTERNATIVE SOLUTIONS LIMITED
- ☐ OLD MUTUAL INSURE LIMITED
- ☐ OLD MUTUAL LIFE ASSURANCE COMPANY (SOUTH AFRICA) LIMITED
- ☐ ONDERLINGE VERSEKERINGSGENOOTSKAP AVBOB
- ☐ ORANGE INSURANCE LIMITED
- ☐ OUTSURANCE INSURANCE COMPANY LIMITED
- ☐ OUTSURANCE LIFE INSURANCE COMPANY LIMITED
- ☐ PEREGRINE LIFE LIMITED
- ☐ PRESCIENT LIFE LIMITED
- ☐ PROFESSIONAL PROVIDENT SOCIETY INSURANCE COMPANY LIMITED
- ☐ PROFESSIONAL PROVIDENT SOCIETY SHORT-TERM INSURANCE COMPANY LIMITED
- ☐ PRUDENTIAL PORTFOLIO MANAGERS (SOUTH AFRICA)LIFE LIMITED
- ☐ PSG LIFE LIMITED
- ☐ RAND MUTUAL ASSURANCE COMPANY LIMITED
- ☐ REAL PEOPLE ASSURANCE COMPANY LIMITED
- ☐ RELYANT LIFE ASSURANCE COMPANY LIMITED
- ☐ RENASA INSURANCE COMPANY LIMITED
- ☐ RGA REINSURANCE COMPANY OF SOUTH AFRICA LIMITED
- ☐ RMA LIFE ASSURANCE COMPANY LTD
- ☐ ROAD ACCIDENT FUND
- ☐ SABSURE LIMITED
- ☐ SAFIRE INSURANCE COMPANY LIMITED
- ☐ SAFRICAN INSURANCE COMPANY LIMITED
- ☐ SAHL INSURANCE COMPANY LIMITED
- ☐ SAHL LIFE ASSURANCE COMPANY LIMITED
- ☐ SANLAM DEVELOPING MARKETS LIMITED
- ☐ SANLAM LIFE INSURANCE LIMITED
- ☐ SANTAM BEPERK
- ☐ SANTAM STRUCTURED INSURANCE LIMITED
- ☐ SANTAM STRUCTURED LIFE LIMITED
- ☐ SASGUARD INSURANCE COMPANY LIMITED
- ☐ SASRIA SOC LIMITED

- ☐ SAXUM INSURANCE LIMITED
- ☐ SCOR AFRICA LIMITED
- ☐ SHIELD LIFE LIMITED
- ☐ SHOPRITE INSURANCE COMPANY LIMITED
- ☐ STANDARD GENERAL INSURANCE COMPANY LIMITED, THE
- ☐ STANDARD INSURANCE LIMITED
- ☐ STRATEGIC INVESTMENT SERVICE LIFE COMPANY LIMITED
- ☐ SUNDERLAND MARINE (AFRICA) LIMITED
- ☐ SWISS RE AFRICA LIMITED
- ☐ SYGNIA LIFE LIMITED
- ☐ THE FEDERATED EMPLOYERS' MUTUAL ASSURANCE COMPANY PROPRIETARY LIMITED (RF)
- ☐ THE SMART LIFE INSURANCE COMPANY LIMITED
- ☐ UNITRANS INSURANCE LIMITED
- ☐ VIVA LIFE INSURANCE LIMITED
- ☐ VODACOM INSURANCE COMPANY LIMITED
- ☐ VODACOM LIFE ASSURANCE COMPANY LIMITED
- ☐ WESTERN NATIONAL INSURANCE COMPANY LIMITED
- ☐ WORKERS LIFE ASSURANCE COMPANY LIMITED
- ☐ WORKERS LIFE INSURANCE LTD

2. **Is your organisation part of an insurance group? ***
Mark only one oval.

- ☐ Yes
- ☐ No
- ☐ Not sure

Understanding Climate Change

3. **Does your organisation (or group) expect that climate change will affect your business? ***
Mark only one oval.

- ☐ Yes *Skip to question 5.*
- ☐ No *Skip to question 4.*

Understanding Climate Change

4. **Does your organisation (or group) already report (internally and/or externally) information relevant to climate change impacts? ***

Mark only one oval.

☐ Yes *Skip to question 6.*

☐ No *Skip to question 8.*

Understanding Climate Change

5. **Indicate which of the following areas, according to your organisation, are expected to be affected by climate change: ***

Tick all that apply.

- ☐ Increasing liability claims
- ☐ Impacts on investment portfolios
- ☐ Changing insurance market dynamics
- ☐ Creation of new opportunities (i.e. new products and services)
- ☐ Other: _____

Skip to question 4.

Reporting information relevant to climate change

6. **Is the information reported: ***

Mark only one oval.

- ☐ internally only (i.e. internal to your organisation)
- ☐ externally only (i.e. external to your organisation)
- ☐ both internally and externally

7. **Please explain the manner in which information is reported and provide links where publicly available. ***

Skip to question 8.

TCFD Awareness and Implementation

Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

8. **Is your organisation (or group) aware of the Recommendations and Supplemental Guidance of the TCFD? ***
Mark only one oval.
- ☐ Yes
- ☐ No
9. **Is your organisation (or group) aware of the 2018 Status Report of the TCFD? ***
Mark only one oval.
- ☐ Yes
- ☐ No
10. **Has your organisation (or group) made plans to, or already taken steps, to implement the TCFD Recommendations and deliver TCFD-aligned disclosures? ***
Mark only one oval.
- ☐ Yes *Skip to question 15.*
- ☐ No *Skip to question 11.*

TCFD Awareness and Implementation

Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

11. **Why has your organisation (or group) not taken steps to implement the TCFD? ***
Mark only one oval.
- ☐ Not previously aware of the TCFD Recommendations until receiving survey
Skip to question 14.
- ☐ Do not consider TCFD Recommendations to be applicable to organisation
Skip to question 12.
- ☐ Not yet assessed if TCFD Recommendations are applicable to organisation
Skip to question 14.
- ☐ Consider that other disclosures our organisation makes are adequate *Skip to question 13.*
- ☐ Do not have or are not able to access relevant data *Skip to question 14.*
- ☐ Resource constraints or capacity issues *Skip to question 14.*
- ☐ Other: _____ *Skip to question 14.*

Skip to question 14.

TCFD Awareness and Implementation

Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

12. **Please explain why your organisation (or group) does not consider the TCFD Recommendations applicable. ***

Skip to question 14.

TCFD Awareness and Implementation

Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

13. **Please explain how other disclosures are adequate in the context of the TCFD Recommendations. ***

Skip to question 14.

TCFD Awareness and Implementation

Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

The report can be accessed below:

<https://www.fsb-tcfid.org/wp-content/uploads/2017/06/FINAL-2017-TCFD-Report-11052018.pdf>

14. **Under what circumstances would your organisation (or group) consider implementing the TCFD Recommendations? ***

Stop filling out this form.

TCFD Disclosures and Reporting

Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

15. **Has your organisation (or group) released TCFD-aligned disclosures for Financial Year 2017 or 2018 (whichever is the latest)? ***
Mark only one oval.

☐ Yes *Skip to question 16.*

☐ No *Skip to question 19.*

TCFD Disclosures and Reporting

Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

16. **Indicate the form in which these disclosures were made: ***
Tick all that apply.

- ☐ Specific stand-alone TCFD-focused report
- ☐ TCFD-relevant information in sustainability report
- ☐ TCFD-relevant information in annual financial report
- ☐ TCFD-relevant information in investor presentations
- ☐ Other: _____

17. **Indicate if your organisation's (or group's) TCFD-aligned disclosures contain the information relating to the TCFD Recommended Disclosures, and the nature of this information: ***
Tick all that apply.

	Quantitative	Qualitative	None
Governance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Strategy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Risk management	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Metrics and Targets	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

18. **Do your organisation's (or group's) TCFD-aligned disclosures contain forward-looking information/analysis, such as the results of scenario analysis? ***
Mark only one oval.

☐ Yes

☐ No

Skip to question 19.

TCFD Disclosures and Reporting

Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

19. **Is your organisation (or group) planning to release TCFD-aligned disclosures for your next financial year? ***

Mark only one oval.

☐ Yes

☐ No

Experience with TCFD

Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

20. **What types of disclosures from investee entities or insureds are useful for your organisation's (or group's) efforts to conduct analysis of climate-related risks and opportunities? ***

21. **What are the key challenges that your organisation (or group) has faced in its efforts to enhance disclosure of information relating to climate-related factors? ***

22. **What are the key challenges that your organisation (or group) has experienced in developing a TCFD report? If your organisation (or group) has yet to develop a TCFD report, what are the key challenges your organisation (or group) foresee in trying to develop a TCFD report? ***

23. What are the key benefits achieved for your organisation (or group) through releasing TCFD-relevant disclosures? If your organisation (or group) has yet to release TCFD-relevant disclosures, what are the benefit your organisation (or group) foresee when releasing such disclosures. *

24. Has your organisation sought to take action on the basis of your TCFD reporting process? *

Mark only one oval.

- ☐ Yes Skip to question 25.
- ☐ No Stop filling out this form.

Stop filling out this form.

Experience with TCFD

Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

25. Indicate how your organisation has sought to take action on the basis of your TCFD reporting process? *

Tick all that apply.

- ☐ Initiating dialogue with investee companies on TCFD information
- ☐ Implementing changes to underwriting risk management or practices
- ☐ Implementing changes to investment risk management or practices
- ☐ Engaging with public authorities (i.e. supervisors and regulators)
- ☐ Other: _____

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5. Annexure B: Banking Survey

TCFD Survey 2019 (SA Banking Sector)

Survey on implementation of the recommendations and guidance of the Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

*Required

1.

Select the name of your organisation *

Mark only one oval.

- ☐ ABSA Bank Limited
- ☐ African Bank Limited
- ☐ Albaraka Bank Limited
- ☐ Bank of Baroda
- ☐ Bank Of China Limited
- ☐ Bank of India
- ☐ Bank of Taiwan
- ☐ Bank Zero Mutual Bank
- ☐ Bidvest Bank Limited
- ☐ BNP Paribas SA
- ☐ Canara Bank
- ☐ Capitec Bank Limited
- ☐ China Construction Bank Corporation
- ☐ Citibank
- ☐ Deutsche Bank AG
- ☐ Discovery Bank Limited
- ☐ Finbond Mutual Bank
- ☐ FirstRand Bank Limited
- ☐ GBS Mutual Bank
- ☐ Grindrod Bank Limited
- ☐ GroBank Limited
- ☐ Habib Overseas Bank Limited
- ☐ HBZ Bank Limited
- ☐ HSBC Bank plc
- ☐ Icici Bank Limited
- ☐ Investec Bank Limited
- ☐ JPMorgan Chase Bank
- ☐ Mercantile Bank Limited
- ☐ Nedbank Limited
- ☐ Sasfin Bank Limited
- ☐ Société Générale
- ☐ Standard Chartered Bank
- ☐ State Bank of India
- ☐ The Standard Bank of South Africa Limited
- ☐ Tyme Bank Limited
- ☐ UBANK Limited

Understanding Climate Change

2. **Does your organisation expect that climate change will affect your business? ***
Mark only one oval.

☐ Yes *Skip to question 4.*
☐ No *Skip to question 3.*

Understanding Climate Change

3. **Does your organisation already report (internally and/or externally) information relevant to climate change impacts? ***
Mark only one oval.

☐ Yes *Skip to question 5.*
☐ No *Skip to question 7.*

Understanding Climate Change

4. **Indicate which of the following areas, according to your organisation, are expected to be affected by climate change: ***
Tick all that apply.

☐ Increased asset impairment
☐ Impacts on pricing of credit risk
☐ Impacts on collateral values
☐ Impacts on investment portfolios
☐ Changing market dynamics
☐ Creation of new opportunities (i.e. new products and services)
☐ Other: _____

Skip to question 3.

Reporting information relevant to climate change

5. **Is the information reported: ***
Mark only one oval.

☐ internally only (i.e. internal to your organisation)
☐ externally only (i.e. external to your organisation)
☐ both internally and externally

6. **Please explain the manner in which information is reported and provide links where publicly available. ***

Skip to question 7.

TCFD Awareness and Implementation

Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

7. **Is your organisation aware of the Recommendations and Supplemental Guidance of the TCFD? ***

Mark only one oval.

☐ Yes

☐ No

8. **Is your organisation aware of the 2018 Status Report of the TCFD? ***

Mark only one oval.

☐ Yes

☐ No

9. **Has your organisation made plans to, or already taken steps, to implement the TCFD Recommendations and deliver TCFD-aligned disclosures? ***

Mark only one oval.

☐ Yes *Skip to question 14.*

☐ No *Skip to question 10.*

TCFD Awareness and Implementation

Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

10.

Why has your organisation not taken steps to implement the TCFD? *

Mark only one oval.

- ☐ Not previously aware of the TCFD Recommendations until receiving survey
Skip to question 13.
- ☐ Do not consider TCFD Recommendations to be applicable to organisation
Skip to question 11.
- ☐ Not yet assessed if TCFD Recommendations are applicable to organisation
Skip to question 13.
- ☐ Consider that other disclosures our organisation makes are adequate *Skip to question 12.*
- ☐ Do not have or are not able to access relevant data *Skip to question 13.*
- ☐ Resource constraints or capacity issues *Skip to question 13.*
- ☐ Other: _____ *Skip to question 13.*

Skip to question 13.

TCFD Awareness and Implementation

Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

11.

Please explain why your organisation does not consider the TCFD Recommendations applicable. *

Skip to question 13.

TCFD Awareness and Implementation

Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

12.

Please explain what other disclosures are made and how these are deemed adequate in the context of the TCFD Recommendations. *

Skip to question 13.

TCFD Awareness and Implementation

Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

The report can be accessed below:

<https://www.fsb-tcfd.org/wp-content/uploads/2017/06/FINAL-2017-TCFD-Report-11052018.pdf>

13. **Under what circumstances would your organisation consider implementing the TCFD Recommendations? ***

Stop filling out this form.

TCFD Disclosures and Reporting

Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

14. **Has your organisation released TCFD-aligned disclosures for Financial Year 2018? ***

Mark only one oval.

- ☐ Yes *Skip to question 15.*
☐ No *Skip to question 18.*

TCFD Disclosures and Reporting

Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

15. **Indicate the form in which these disclosures were made: ***

Tick all that apply.

- ☐ Specific stand-alone TCFD-focused report
☐ TCFD-relevant information in sustainability report
☐ TCFD-relevant information in annual financial report
☐ TCFD-relevant information in investor presentations
☐ Other: _____

16. **Indicate if your organisation's TCFD-aligned disclosures contain the information relating to the TCFD Recommended Disclosures, and the nature of this information: ***
Tick all that apply.

	Quantitative	Qualitative	None
Governance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Strategy	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Risk management	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Metrics and Targets	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

17. **Do your organisation's TCFD-aligned disclosures contain forward-looking information/analysis, such as the results of scenario analysis? ***
Mark only one oval.

☐ Yes
☐ No

Skip to question 18.

TCFD Disclosures and Reporting

Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

18. **Is your organisation planning to release TCFD-aligned disclosures for financial year 2019? ***
Mark only one oval.

☐ Yes
☐ No

Experience with TCFD

Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

19. **What types of disclosures from other entities are useful for your organisation's efforts to conduct analysis of climate-related risks and opportunities? ***

20. **What are the key challenges that your organisation has faced in its efforts to enhance disclosure of information relating to climate-related factors? ***

21. **What are the key challenges that your organisation has experienced in developing a TCFD report? If your organisation has yet to develop a TCFD report, what are the key challenges your organisation foresee in trying to develop a TCFD report? ***

22. **What are the key benefits achieved for your organisation through releasing TCFD-relevant disclosures? If your organisation has yet to release TCFD-relevant disclosures, what are the benefit your organisation foresee when releasing such disclosures. ***

23. **Has your organisation sought to take action on the basis of your TCFD reporting process? ***

Mark only one oval.

- ☐ Yes *Skip to question 24.*
☐ No *Stop filling out this form.*

Stop filling out this form.

Experience with TCFD

Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD)

24.

Indicate how your organisation has sought to take action on the basis of your TCFD reporting process? *

Tick all that apply.

- ☐ Initiating dialogue with investee companies on TCFD information
- ☐ Implementing changes to credit risk appetite and tolerance levels
- ☐ Implementing changes to investment risk management or practices
- ☐ Engaging with public authorities (i.e. supervisors and regulators)
- ☐ Other: _____

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