湖州银行环境与社会管理体系（ESMS）概述

总体战略

湖州银行作为“绿水青山就是金山银山”理念发源地的法人城商行，于2019年采纳赤道原则，成为国内第三家赤道银行。设立战略和ESG委员会、绿色金融专业委员会及绿色金融部，发布全国银行业首部《转型规划》，将环境与社会风险管理纳入信贷全流程，致力打造绿色金融标杆行。

环境与社会管理标准及流程

湖州银行以赤道原则为核心构建环境与社会管理体系框架。在此基础上，依据亚洲基础设施投资银行《环境与社会框架》的相关要求，修订《环境和社会管理体系操作规程》等制度。

环境社会管理流程实行标准与简化并行的两级体系：针对规模较大、投向属于重点行业的项目实行标准流程，遵循赤道原则将项目分为A、B、C三类，实行差异化风险管理；其他项目则实行简化流程，依托系统自动识别客户环境和社会风险等级，评级结果用于贷后检查及节能减排业务营销。

组织架构

湖州银行设立董事会—经营层—执行层三级管理体系：

董事会层面：战略和ESG委员会、绿色金融专业委员会统筹全行绿色金融战略。

经营层层面：在总行由绿色金融部牵头负责环境与社会风险管理，风险管理部、法律合规部、办公室（消费者权益

保护办公室）等部门协同参与，并设立绿色金融领导小组、转型规划领导小组，共同推进跨部门协调与决策。

执行层层面：在分支行设立绿金专员、审查岗、放款岗、客户经理，共同落实环境社会风险识别与现场尽调。

系统支撑

湖州银行依托绿色信贷业务系统，实现绿色信贷全流程数字化管理。该系统经多年迭代，已集成客户碳账户、环境与社会风险识别、环境效益测算、赤道项目管理等多项功能，辅助识别与防范“漂绿”风险，提升绿色资产的真实性与透明度。

外部沟通与申诉机制

湖州银行作为中英环境信息披露试点单位，自 2018 年起连续 8 年公开发布环境信息披露报告，披露运营碳排放、能耗数据及投融资绿色信贷规模、碳减排效益等。本行建立覆盖总分行三级客户投诉处理体系，客户可通过柜面、热线、官网等渠道投诉环境社会问题，本行承诺限时核查反馈[1]。

体系更新与培训

湖州银行绿色金融部牵头，每年至少开展一次 ESMS 全面评审，优化分类标准、评估模型及管理流程。关键岗位（绿金专员、客户经理、审查岗）定期开展赤道原则、环境社会风险分类、ESG 评价等专业培训，确保员工具备履职所需知识与技能。

[1] 若申诉人认为与项目相关的环境和社会问题未能通过上述申诉渠道得到充分解决，对于由亚投行出资的项目，可通过‘亚投行项目影响人员机制’（Project Affected Peoples Mechanism，详见：https://www.aiib.org/en/policies-strategies/operational-policies/policy-on-the-project-affected-mechanism.html）进一步提交申诉。

Huzhou Bank Environmental and Social Management System (ESMS) Overview

Overall Strategy

As a city commercial bank headquartered in the birthplace of the philosophy that "lucid waters and lush mountains are invaluable assets," Huzhou Bank adopted the Equator Principles in 2019, becoming the third Equator Bank in China. The Bank has established a Strategy and ESG Committee, a Green Finance Professional Committee, and a Green Finance Department, and has published the first Transition Plan in China's banking industry. Environmental and social risk management has been integrated into the entire credit process, demonstrating the Bank's commitment to becoming a benchmark green financial institution.

Environmental and Social Management Standards and Processes

Huzhou Bank has established its Environmental and Social Management System framework with the Equator Principles as its core. Building on this foundation, and in accordance with the relevant requirements of Asian Infrastructure Investment Bank’s Environmental and Social Framework revising its approach through policies "Environmental and Social Management System Operating Procedures."

The environmental and social management process

operates under a dual-track system, with both standard and simplified procedures. For larger-scale projects or those in key industries, the standard process applies, categorizing projects as A, B, or C in accordance with the Equator Principles for differentiated risk management. Other projects follow a simplified process, relying on the system to automatically assess the client's environmental and social risk level based on predefined screening criteria. These assessment results inform post-loan monitoring and guide marketing efforts for energy conservation and emissions reduction projects.

Organizational Structure

Huzhou Bank has established a three-tier management structure comprising the Board of Directors, the Management Level, and the Implementation Level.

Board Level: The Strategy and ESG Committee and the Green Finance Professional Committee oversee the Bank's overall green finance strategy.

Management Level: At the head office level, the Green Finance Department takes the lead in managing environmental and social risks, with coordinated participation from the Risk Management Department, the Legal and Compliance Department, and the Office (Consumer Protection Office). The Green Finance Leadership Group and the Transition Planning Leadership Group have also been established to facilitate

cross-departmental coordination and decision-making.

Implementation Level: At the branch level, dedicated Green Finance Specialists, Review Officers, Loan Disbursement Officers, and Relationship Managers work together to conduct environmental and social risk identification and on-site due diligence.

System Support

Huzhou Bank relies on its Green Credit Business System to achieve comprehensive digital management throughout the entire green credit process. Through years of iterative development, the system now integrates multiple functions, including client carbon accounts, environmental and social risk identification, environmental benefit calculations, and Equator Principles project management. This helps identify and mitigate "greenwashing" risks, thereby enhancing the authenticity and transparency of green assets.

External Communication and Grievance Mechanism

As a pilot institution for the UK-China Climate and Environmental Information Disclosure project, Huzhou Bank has publicly released Environmental Information Disclosure Reports annually for eight consecutive years since 2018. These reports disclose operational carbon emissions, energy consumption data, as well as the scale of green credit and carbon emission reduction benefits from its investments and financing

activities. The Bank has established a three-tier (head office, branch, sub-branch) customer complaint handling system. Clients can submit complaints regarding environmental and social issues through various channels, including bank counters, hotlines, and the official website[2]. The Bank commits to investigating and providing feedback within a specified timeframe.

System Updates and Training

Led by the Green Finance Department, Huzhou Bank conducts at least one comprehensive review of the ESMS annually to refine classification criteria, assessment models, and management processes. Key personnel, including Green Finance Specialists, Relationship Managers, and Review Officers, participate in regular professional training on the Equator Principles, environmental and social risk classification, ESG assessment, and other relevant topics. This ensures that employees possess the necessary knowledge and skills to fulfill their responsibilities effectively.

[2] If a complainant believes that subproject-related environmental and social issues have not been adequately addressed through the above-mentioned grievance channels, for subprojects financed by the Asian Infrastructure Investment Bank (AIIB), a further complaint may be submitted through the AIIB's Project-Affected People's Mechanism (PPM), available at: https://www.aiib.org/en/policies-strategies/operational-policies/policy-on-the-project-affected-mechanism.html.