World Benchmarking Alliance



Methodology for the 2024 Financial System Benchmark

Methodology supplement – mapping of indicators

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1 Introduction

This document is a supplement to the Financial System Benchmark Methodology intended to provide a mapping towards the first iteration of the benchmark.

2 Indicator mapping

Table 1 Indicator mapping

Reference	Indicator name	Indicator text	Change	Reference 2022	Indicator name 2022	Indicator text 2022
A.01	Impact materiality and strategy	The assessed entity identifies its material sustainability impacts and has a strategy to address them.	Rephrasing and split of FSB.A01	*FSB.A01*	*Impact management and strategy*	*The financial institution has impact management objectives and targets embedded in its strategy and business model.*
A.02	Impact targets and plans	The assessed entity sets targets and plans for improving its sustainability impacts.	Rephrasing and split of FSB.A01	*FSB.A01*		
A.03	Governance and incentives	The assessed entity assigns responsibility for its sustainability strategy and makes sustainability performance consequential to executives.	Rephrasing of FSB.A02 to simplify	*FSB.A02*	*Senior leadership accountability and remuneration*	*The financial institution assigns decision-making and oversight responsibility for a strategy on impact and/or sustainability themes to the highest governing body. Board members have specific objectives and targets relating to sustainability themes (society and the environment) and remuneration is aligned with meeting these targets.*

Reference	Indicator name	Indicator text	Change	Reference 2022	Indicator name 2022	Indicator text 2022
A.04	Stewardship policy and reporting	The assessed entity has a stewardship policy that promotes environmental and social sustainability and discloses its application.	Expanded to cover the wider concept of stewardship and clarified	*FSB.A04*	*Engagement policy*	*The financial institution has a clear engagement policy on sustainability and impact topics.*
A.05/ CSI18+	Responsible lobbying and political engagement fundamentals	The assessed entity has an approach to lobbying and political engagement and has related controls in place.	No change at indicator level. Moved from C part.	*CSI.18*	*Responsible lobbying and political engagement fundamentals*	*The company has an approach to lobbying and political engagement and has related controls in place.*
A.06	Applying responsible lobbying principles	The assessed entity aligns its lobbying and political engagement activities with responsible lobbying principles.	Rephrased to clarify FSB. A05	*FSB.A05*	*Public policy engagement*	*The financial institution has a consistent policy approach in its lobbying and public policy engagement.*
B.I.07	Approach to fossil fuel and high-emitting sectors	The assessed entity adjusts its activities in fossil fuel and high-emitting sectors to align with 1.5°C trajectories	Rephrased to clarify FSB. B05	*FSB.B05/ B10*	*Approach to fossil fuel sectors*	*The financial institution adjusts its activities in fossil fuel sectors, in line with the best available science.*
B.I.08	Resources for climate mitigation solutions	The assessed entity provides products, services and capital for climate mitigation solutions and has targets for this.	Rephrased to be applicable beyond investors and clarified	*FSB.B04/ B09*	*Climate solutions*	*The financial institution discloses its level of financing for climate solutions.*

B.I.09	Climate engagement alignment	The assessed entity engages with clients, investees, and other stakeholders, to promote alignment with 1.5°C trajectories.	Rephrased to be applicable beyond investors and clarified	*FSB.B03/ B08*	*Engagement aligned with a 1.5°C trajectory*	*The financial institution engages with companies it provides financial services to, in line with a 1.5°C trajectory.*
B.I.10	Nature-related impacts strategy	The assessed entity identifies and prioritizes its positive and negative impacts on nature and has a protection and restoration strategy in place.	Rephrased for clarity aiming to reflect both positive and negative impacts	*FSB.B06/ B11*	*Nature and biodiversity-related impacts*	*The financial institution identifies its impacts on nature and biodiversity and sets targets to address them.*
B.I.11	Reduction of negative impacts on nature	The assessed entity monitors its exposure to the sectors and areas representing its highest negative impact on nature and sets targets to address this impact.	Rephrased for clarity	*FSB.B07/ B12*	*Protection and restoration of nature and biodiversity through finance*	*The financial institution adjusts its financing activities to address its nature- and biodiversity-related impacts.*
B.I.12	Resources for nature-positive solutions	The assessed entity provides products, services and capital for nature-positive solutions and has targets for this.	Rephrased for clarity	*FSB.B09/ B14*	*Nature- and biodiversity-related solutions*	*The financial institution has targets for nature- and biodiversity related/regenerative solutions.*
B.I.13	Nature-related engagement activities	The assessed entity engages with clients, investees and other stakeholders on nature-protection and restoration.	Rephrased to be applicable beyond investors and clarified	*FSB.B08/ B13*	*Protection and restoration of nature and biodiversity through engagement*	*The financial institution engages with companies it provides financial services to, in line with the nature-related commitments defined in indicator 12.*
B.I.14	Resources for climate adaptation and resilience	The assessed entity has a strategy for provision of products, services and capital for climate adaptation and resilience	**NEW**			

B.II.15	Organizational carbon footprint	The assessed entity monitors its carbon footprint including its financed GHG emissions.	Rephrased in line with expanded scope	*FSB.B01/ B06*	*Financed emissions*	*The financial institution discloses its financed GHG emissions.*
B.II.16	Net zero and 1.5°C aligned climate targets	The assessed entity has established a net zero target and aligns its financed emissions with a 1.5°C trajectory.	Rephrased in line with expanded scope and clearer link to net zero	*FSB.B02/ B07*	*Financed emissions targets*	*The financial institution sets targets for its financed emissions, in line with a 1.5°C trajectory.*
C.I.17	Resources for under-represented groups	The assessed entity discloses how much products, services and capital it contributes to specific groups that traditionally receive less such services.	Split and expansion of FSB.C32 to separate different types of exclusions	*FSB.C32*	*Financing for usually excluded groups*	*The financial institution discloses how much financing it contributes to specific groups, entities or industries that traditionally receive less financing.*
C.I.18	Resources for under-represented businesses and enterprises	The assessed entity discloses how it directs products, services and capital to businesses and enterprises that traditionally receive less such services.	Split and expansion of FSB.C32 to separate different types of exclusions	*FSB.C32*	*Financing for usually excluded groups*	*The financial institution discloses how much financing it contributes to specific groups, entities or industries that traditionally receive less financing.*
C.I.19	Resources for low-income and lower-middle income countries	The assessed entity discloses how it directs products, services and capital to low-income and lower-middle income countries.	Split and expansion of FSB.C32 to separate different types of exclusions	*FSB.C32*	*Financing for usually excluded groups*	*The financial institution discloses how much financing it contributes to specific groups, entities or industries that traditionally receive less financing.*
C.I.20	Downstream impacts on fundamental rights of work	The assessed entity considers the ILO fundamental rights of work in relation to its provision of products, services and capital.	**NEW**			

C.I.21	Downstream living wages policy and strategy	The assessed entity adopts a living wages policy for its provision of products, services and capital.	**NEW**			
C.I.22	Just transition risk mitigation and stewardship	The assessed entity considers just transition in its provision of products, services and capital.	**NEW**	*NEW*		
C.II.23/ CSI1	Commitment to respect human rights	The assessed entity publicly commits to respecting all internationally recognised human rights across its activities.	No change at indicator level	*CSI.01/ C15*	*Commitment to respect human rights*	*The company publicly commits to respecting all internationally recognised human rights across its activities.*
C.II.24/ CSI3	Identifying human rights risks and impact	The assessed entity proactively identifies its human rights risks and impacts.	No change at indicator level	*CSI.03/ C17*	*Identifying human rights risk and impacts*	*The company proactively identifies its human rights risks and impacts.*
C.II.25/ CSI4	Assessing human rights risks and impacts	Having identified its human rights risks and impacts, the assessed entity assesses them and then prioritises its salient human rights risks and impacts.	No change at indicator level	*CSI.04/ C18*	*Assessing human rights risks and impacts*	*Having identified its human rights risks and impacts, the company assesses them and then prioritises its salient human rights risks and impacts.*
C.II.26/ CSI5	Integrating and acting on human rights risk and impact assessments	The assessed entity integrates the findings of its assessments of human rights risks and impacts into relevant internal functions and processes by taking appropriate actions to prevent, mitigate or remediate its salient human rights issues.	No change at indicator level	*CSI.05/ C19*	*Integrating and acting on human rights risk and impact assessments*	*The company integrates the findings of its assessments of human rights risks and impacts into relevant internal functions and processes by taking appropriate actions to prevent, mitigate or remediate its salient human rights issues.*

C.II.27/ CSI06	Engaging with affected and potentially affected stakeholders	As part of identifying and assessing its human rights risks and impacts, the assessed entity identifies and engages with stakeholders whose human rights have been or may be affected by its activities	No change at indicator level	*CSI.06/ C20*	*Engaging with affected and potentially affected stakeholders*	*As part of identifying and assessing its human rights risks and impacts, the company identifies and engages with stakeholders whose human rights have been or may be affected by its activities.*
C.II.28/ CSI08	Grievance mechanisms for external individuals and communities	The assessed entity has one or more channel(s)/ mechanism(s) (its own, third party or shared) through which individuals and communities who may be adversely impacted by the assessed entity can raise complaints or concerns, including in relation to human rights issues.	No change at indicator level	*CSI.07/ C21*	*Grievance mechanisms for workers*	*The company has one or more channel(s)/mechanism(s) (its own, third party or shared) through which workers can raise complaints or concerns, including in relation to human rights issues.*
C.II.29/ CSI02	Commitment to respect the human rights of workers	The assessed entity publicly commits to respecting the principles concerning fundamental rights at work in the eight ILO core conventions as set out in the ILO Declaration on Fundamental Principles and Rights at Work.	No change at indicator level but additional text not part of original CSI indicator has been removed. Indicator appears in different order to collect all indicators related to decent work.	*CSI.02/ C16*	*Commitment to respect the human rights of workers*	*The company publicly commits to respecting the principles concerning fundamental rights at work in the eight ILO core conventions as set out in the ILO Declaration on Fundamental Principles and Rights at Work. It also has a publicly available statement of policy committing it to respect the human rights of workers in its business relationships.*

C.II.30// CSI09	Health and safety fundamentals	The assessed entity publicly commits to respecting the health and safety of workers and discloses relevant data. It also places health and safety expectations on and monitors the performance of its suppliers.	No change at indicator level	*CSI.09/ C23*	*Health and safety fundamentals*	*The company publicly commits to respecting the health and safety of workers and discloses relevant data. It also places health and safety expectations on and monitors the performance of its business relationships.*
C.II.3109/ CSI10	Living wage fundamentals	The assessed entity is committed to paying its workers a living wage and supports the payment of a living wage by its suppliers.	No change at indicator level.	*CSI.10/ C24*	*Living wage fundamentals*	*The company is committed to paying its workers a living wage and supports the payment of a living wage by its business relationships.*
C.II.32/ CSI7	Grievance mechanisms for workers	The assessed entity has one or more channel(s)/ mechanism(s) (its own, third party or shared) through which workers who may be adversely impacted by the assessed entity can raise complaints or concerns, including in relation to human rights issues.	No change at indicator level. Appears in different order	*CSI.08/ C22*	*Grievance mechanisms for external individuals and communities*	*The company has one or more channel(s)/mechanism(s) (its own, third party or shared) through which workers who may be adversely impacted by the Company can raise complaints or concerns, including in relation to human rights issues.*
C.II.33/ CSI11	Working hours fundamentals	The assessed entity does not require workers to work more than the regular and overtime hours and places equivalent expectations on its suppliers.	No change at indicator level.	*CSI.11/ C25*	*Working hours fundamentals*	*The company does not require workers to work more than the regular and overtime hours and places equivalent expectations on its business relationships.*

C.II.34/ CSI12	Collective bargaining fundamentals	The assessed entity discloses information about collective bargaining agreements covering its workforce and its approach to supporting the practices of its suppliers in relation to freedom of association and collective bargaining.	No change at indicator level.	*CSI.12/ C26*	*Collective bargaining fundamentals*	*The company discloses information about collective bargaining agreements covering its workforce and its approach to supporting the practices of its business relationships in relation to freedom of association and collective bargaining.*
C.II.35/ CSI13	Workforce diversity disclosure fundamentals	The assessed entity discloses the percentage of employees for each employee category by at least four indicators of diversity.	No change at indicator level.	*CSI.13/ C27*	*Workforce diversity disclosure fundamentals*	*The company discloses the percentage of employees for each employee category by at least four indicators of diversity.*
C.II.36/ CSI14	Gender equality and women's empowerment fundamentals	The assessed entity publicly commits to gender equality, promotes gender equality and discloses quantitative information on gender equality and women's empowerment.	No change at indicator level, but the indicator was moved from A.	*CSI.14/ C28*	*Gender equality and women's empowerment fundamentals*	*The financial institution publicly commits to gender equality, promotes gender equality and discloses quantitative information on gender equality and women's empowerment.*
C.II.37/ CSI15	Personal data protection fundamentals	The assessed entity publicly commits to protecting personal data and has a global approach to data privacy.	No change at indicator level.	*CSI.15/ C29*	*Personal data protection fundamentals*	*The company publicly commits to protecting personal data and has a global approach to data privacy.*
C.II.38/ CSI16	Responsible tax fundamentals	The assessed entity has a public global tax approach and discloses its corporate income tax payments on a country-by-country basis.	No change at indicator level.	*CSI.16/ C30*	*Responsible tax fundamentals*	*The company has a public global tax approach and discloses its corporate income tax payments on a country-by-country basis.*
C.II.39/ CSI17	Anti-bribery and anti-corruption fundamentals	The assessed entity publicly prohibits bribery and corruption and takes steps to identify and address bribery and corruption risks and incidents.	No change at indicator level.	*CSI.17/ C31*	*Anti-bribery and anti-corruption fundamentals*	*The company publicly prohibits bribery and corruption and takes steps to identify and address bribery and corruption risks and incidents.*

3 Element mapping

Table 2 Element mapping

Reference	Element text	Change	Reference 2022	Element text 2022
		REMOVED. Not prioritized in the benchmarking as the bar is considered rather low.	*A1.Ea*	*The financial institution acknowledges its impact on society and the environment. AND*
A01.i	The assessed entity transparently identifies and prioritises its material sustainability impacts across its value chain based on objective criteria and/or supportable evidence.	NEW/REPLACES A1.Eb. The new element highlights the quality of the impact materiality processes.	*A1.Eb*	*The financial institution discloses its process for identifying and prioritising the impacts/issues it aims to address. AND*
A01.ii	The assessed entity provides the basis and rational for its identified and prioritized material impacts.	NEW. The new element is complementary by focusing on the outcome of the impact materiality process.		
A01.iii	The assessed entity has a sustainability strategy covering its material impacts.	NEW. The new element is complementary by focusing on the strategy.		
FSB2024.2.i	The assessed entity has time-bound and measurable targets for improving its identified material sustainability impacts.	MODIFIED A1.Ec. Targets now refer to the materiality of impacts and consider measurability.	*A1.Ec*	*The financial institution discloses time-bound targets for the impacts it has prioritised. AND*
FSB2024.2.ii	The assessed entity has a plan for aligning its portfolio and offerings with its targets.	NEW. Concrete plans are key to progress.		

Reference	Element text	Change	Reference 2022	Element text 2022
FSB2024.2.iii	The assessed entity has a plan for aligning its stewardship activities with its targets.	NEW. Concrete plans are key to progress.		
FSB2024.2.iv	The assessed entity progresses in line with its targets.	MODIFIED A1.Ed. Clarification that the focus is on the progress.	*A1.Ed*	*The financial institution tracks and reports progress against the targets it has identified*
FSB2024.2.v	The assessed entity conducts third-party assurance or verification of its target reporting	NEW. Third-party review is considered an important step to verify the quality of the target.		
FSB2024.3.i	The assessed entity assigns decision-making and oversight responsibility for its sustainability strategy to the highest governance body.	MINOR REPHRASING of A2.Ea. Simplification of language.	*A2.Ea*	*The financial institution assigns decision-making and oversight responsibility for a strategy on impact and/or sustainability themes to the highest governing body (e.g. board of directors). AND*
FSB2024.3.ii	The assessed entity links performance criteria for remuneration at the senior executive level to specific sustainability targets.	MINOR REPHRASING of A2.Eb. Simplification of language	*A2.Eb*	*The financial institution links performance criteria and remuneration of the executive team to its targets relating to sustainability themes (society and the environment). AND*
		REMOVED. Element not specific enough and difficult to analyse as it requires detailed knowledge of applicable management teams.	*A2.Ec*	*The financial institution links performance criteria and remuneration of its management teams with its targets relating to sustainability themes (society and the environment). AND*

Reference	Element text	Change	Reference 2022	Element text 2022
		REMOVED. The 60% level seems not to have a solid foundation. A more elaborated element on bonuses may be considered for a later edition.	*A2.Ed*	*The financial institution discloses that at least 60% of bonuses is linked to targets relating to sustainability themes (society and the environment).*
FSB2024.3.iii CSI14	The assessed entity maintains a gender balance (between 40 -60%) at the highest governance body.	MODIFIED A3.Ec to align with WBA´s GENDER elements	*A3.Ec*	*The financial institution has at least 40% women in the highest governance body. AND*
FSB2024.3.iv CSI14	The assessed entity maintains a gender balance (between 40 -60%) at the senior executive level.	MODIFIED A3.Ed to align with WBA´s GENDER elements	*A3.Ed*	*The financial institution has at least 40% women in senior leaderships positions. AND*
FSB2024.3.v	The assessed entity assigns responsibility for implementing its sustainability strategy to functions, teams or committees within the company.	NEW. Assigning responsibility within an entity is considered an important part of governance to ensure that strategies and plans are implemented.		
FSB2024.4.i	The assessed entity has a stewardship policy that promotes environmental and social sustainability in line withs its sustainability strategy.	MODIFIED A4.Ea. Broadened to address different types of stewardship activities. Also connects to the strategy.	*A4.Ea*	*The financial institution has an engagement policy that includes sustainability and impact topics. AND*
FSB2024.4.ii	The stewardship policy covers client and other stakeholder engagement as well as advocacy and partnerships.	NEW. Addressing full coverage of the stewardship activities.		

Reference	Element text	Change	Reference 2022	Element text 2022
FSB2024.4.iii	The stewardship policy includes criteria for what is considered a successful stewardship result, escalation routes if unsuccessful and defines when escalations should happen.	MODIFIED A4.Eb. Expectations have been made clearer in the element text.	*A4.Eb*	*This engagement policy includes clear frameworks with success criteria and escalation points. AND*
FSB2024.4.iv	The assessed entity publishes an engagement/stewardship report describing the outcome of engaging on sustainability impact topics.	MODIFIED A4.Ec. The text more clearly focuses on outcome, not process.	*A4.Ec*	*The financial institution publishes an engagement/stewardship report providing evidence of how the policy is applied in practice. AND*
		REMOVED. Modified iv) focusing on overall outcome is considered priority compared to single case studies .	*A4.Ed*	*The financial institution publishes case studies describing where it has engaged successfully on sustainability and impact topics. AND*
		REMOVED. Modified iv) focusing on overall outcome is considered priority compared to single case studies .	*A4.Ee*	*The financial institution publishes case studies describing where it has engaged unsuccessfully on sustainability and impact topics.*
FSB2024.5.i CSI18+	The assessed entity has a publicly available policy statement(s) (or policy(ies)) setting out its lobbying and political engagement approach.	UNCHANGED CSI element	*C31.Ea*	*The financial institution has a publicly available policy statement(s) (or policy(ies) setting out its lobbying and political engagement approach.*
FSB2024.5.ii CSI18+	The assessed entity has a publicly available policy statement that specifies that it does not make political contributions.	UNCHANGED CSI element	*C31.Eb*	*The financial institution has a publicly available policy statement that specifies that it does not make political contributions.*

Reference	Element text	Change	Reference 2022	Element text 2022
FSB2024.5.iii CSI18+	The assessed entity discloses its expenditures on lobbying activities.	UNCHANGED CSI element	*C31.Ec*	*The financial institution discloses its expenditures on lobbying activities.*
FSB2024.5.iv CSI18+	The assessed entity requires third-party lobbyists to comply with its lobbying and political engagement policy (or policies).	UNCHANGED CSI element	*C31.Ed*	*The financial institution requires third-party lobbyists to comply with its lobbying and political engagement policy (or policies).*
FSB2024.5.v CSI18+	The assessed entity discloses a list of the trade associations of which it is a member (FSB specific).	MOVED from 2022 A05. Provides a clearer cut between 5 and 6.		
FSB2024.6.i	The assessed entity commits to not use its lobbying and political engagement power to impact in directions that would lead to adverse sustainability impacts.	NEW. Clarification of the importance of the direction of the lobbying and political engagement power.	*A5.Ea*	*The financial institution discloses a list of the trade associations of which it is a member. AND*
FSB2024.6.ii	The assessed entity discloses the positions it takes in its lobbying and political engagement activities on sustainability topics.	MINOR REHRASING of A5.Eb. Simplification of language.	*A5.Eb*	*The financial institution discloses the positions it takes in its lobbying and political engagement activities on sustainability themes (society and the environment). AND*
FSB2024.6.iii	The assessed entity discloses specific actions taken to align its lobbying and public policy engagement with its sustainability strategy.	NEW. Focusing on positions without focusing on action does not give a sufficient ground for analysis.		

		REMOVED. At this point disclosure of such audits is not considered priority compared to other elements.	*A5.Ec*	*The financial institution discloses internal or third-party audits of its direct and indirect lobbying and political engagement activities to ensure alignment with its sustainability policy and commitments. AND*
FSB2024.7.i	The assessed entity discloses the amount and/or share (in monetary terms) of its provision of products, services and capital linked to high-emitting sectors and fossil fuel sectors.	MODIFIED B10.Ea. Clarification to more clearly show relevance to different sub-sectors.	*B10.Ea*	*The financial institution discloses the amount (in monetary terms) and share (%) of financing activities linked to high-emitting sectors and fossil fuel sectors. AND*
FSB2024.7.ii	The assessed entity does not provide products, services or capital, neither to new fossil fuel projects nor to clients and investees undertaking such projects.	MODIFIED B10.Eb. Simplification in wording and changed language to more clearly show relevance to different sub-sectors.	*B10.Eb*	*The financial institution discloses that it does not provide any type of financial service to any new fossil fuel projects (e.g. project loans) or any type of financial service to a company undertaking new fossil fuel projects. AND*
FSB2024.7.iii	The assessed entity has a time-bound strategy to phase out the provision of products, services and capital to existing fossil fuel projects and clients and investees across the fossil fuel value chain, which lack a well-defined strategy aligned with a 1.5°C trajectory.	MODIFIED B10.Ec. Simplification in wording and changed language to more clearly show relevance to different sub-sectors.	*B10.Ec*	*The financial institution discloses an approach towards financing activities, outlining a strategy to phase out the provision of any type of financial service to existing projects and companies across the fossil fuel value chain, unless they have a clear strategy aligned with 1.5°C trajectory.*

FSB2024.8.i	The assessed entity discloses the aggregate amount and/or share (in monetary terms) of its provision of products, services and capital devoted to specified mitigation-oriented climate solutions.	MINOR REHRASING of B9.Ea. Clarification of language.	*B9.Ea*	*The financial institution discloses the aggregate amount (in monetary terms) and share (%) of its financing activities devoted to climate solutions, while specifying what those are. AND*
		REMOVED. This is seen as a precondition to i)	*B9.Eb*	*The financial institution defines climate solutions according to internationally adopted frameworks (e.g. EU Taxonomy, Climate Bonds Initiative). AND*
FSB2024.8.ii	The assessed entity has time-bound and measurable targets for provision of products, services and capital for these climate solutions.	MODIFIED B9.Ec. Targets now refers clearly to measurability.	*B9.Ec*	*The financial institution discloses time-bound targets for its climate solutions. AND*
FSB2024.8.iii	The assessed entity progresses in line with its target.	MODIFIED B9.Ed. Clarification that the focus is on the progress.	*B9.Ed*	*The financial institution discloses progress against its targets.*
FSB2024.9.i	The assessed entity transparently identifies the key sectors, clients and investees to engage with on climate issues.	MODIFIED B8.Ea. Rephrased to stress the importance of transparency in how the selected engagement priorities were chosen. Wording is also aimed to be more inclusive of different sub-sectors.	*B8.Ea*	*The financial institution discloses key sectors and companies it has identified as priorities to engage with on climate issues and the rationale for choosing these priorities. AND*
FSB2024.9.ii	The assessed entity engages with these clients and investees to influence and support their alignment with 1.5°C trajectories.	MODIFIED B8.Eb. Simplified and rephrased to be more inclusive of different subsectors.	*B8.Eb*	*The financial institution discloses alignment with a 1.5°C trajectory as one of its engagement topics/priorities with companies it provides financial services to. AND*

FSB2024.9.iii	The assessed entity engages in partnerships to support the alignment of clients and investees with 1.5°C trajectories (e.g. through Climate Action 100+).	MINOR REPHRASING of B8.Ec. Simplifications of phrasing.	*B8.Ec*	*The financial institution discloses that it collectively engages (e.g. through Climate Action 100+) with companies it provides financial services to on the topic of alignment with a 1.5°C trajectory. AND*
		REMOVED. Setting requirements on downstream actors seems less feasible at this point when considering all sub-sectors	*B8.Ed*	*The financial institution discloses that it requires companies to which it provides financial services to have a strategy aligned with a 1.5°C trajectory.*
FSB2024.10.i	The assessed entity transparently identifies the nature-related impacts associated with its **provision** of products, services and capital.	MODIFIED B11.Ea. Rephrased to more clearly focus on the outcome of a formal process than on its existence. The term 'nature-related' encompasses 'biodiversity'.	*B11.Ea*	*The financial institution discloses its process for identifying the nature- and biodiversity-related impacts of its financing activities. AND*
FSB2024.10.ii	The assessed entity transparently identifies and prioritizes sectors and areas for nature-related impacts, i.e. sectors and areas associated with the highest impact on nature stemming from its provision of products, services and capital.	NEW. This is adding to B11.Ea as the prioritization step was not previously covered by any element.		
		REMOVED. Not prioritized in the benchmarking – a commitment is not considered a sufficient integration of nature-related impacts to score.	*B11.Eb*	*The financial institution is committed to minimising its negative impact on nature and biodiversity. AND*
FSB2024.10.iii	The assessed entity has a strategy for the protection and restoration of nature covering at least its priority sectors and areas.	NEW. The importance of having a strategy was not reflected in the previous edition.		

		REMOVED. Replaced with the broader strategy-element (10 iii) which is applicable across sub-sectors	*B12.Ec*	*The financial institution discloses financing criteria it has towards ensuring the protection of priority sectors and areas.*
		REMOVED. Seen as a precondition for 10 i)	*B12.Ea*	*The financial institution provides a definition of priority sectors and areas and the process for identifying them. AND*
FSB2024.11.i	The assessed entity discloses the amount and/or share (in monetary terms) of its provision of products, services and capital linked to its priority sectors and areas representing its highest negative impact on nature.	MINOR REHRASING of B12.Eb. Clarification of language. Also clarifying that this refers to negative impacts.	*B12.Eb*	*The financial institution discloses the amount (in monetary terms) and share (%) of its financing portfolio in priority sectors and areas. AND*
FSB2024.11.ii	The assessed entity has time-bound and measurable targets for reducing its negative impact on nature.	MOVED TO 11 as 10 (2022 B11) focus on strategy and aims to address both positive and negative impacts while 11 is dedicated to negative impacts. Also aligning language with other elements by referring to targets as time-bound and measurable.	*B11.Ec*	*The financial institution discloses targets to minimise its negative impact on nature and biodiversity.*
FSB2024.11.iii	The assessed entity progresses in line with its target.	NEW. Complementary by acknowledging that targets by themselves are insufficient.		

FSB2024.12.i	The assessed entity discloses the aggregate amount and/or share (in monetary terms) of its provision of products, services and capital devoted to specified nature-positive solutions.	MODIFIED B14.Ea. Clarification and changed language to more clearly show relevance to different sub-sectors.	*B14.Ea*	*The financial institution discloses the aggregate amount (in monetary terms) and share (%) of its financing activities devoted to nature- and biodiversity-related/regenerative solutions, while specifying what those are. AND*
FSB2024.12.ii	The assessed entity has time-bound and measurable targets for provision of products, services and capital for nature-positive solutions.	MODIFIED B14.Eb. Clarification and changed language to reflect the importance of measurability and more clearly show relevance to different sub-sectors.	*B14.Eb*	*The financial institution has **targets to contribute to nature- and biodiversity-related/regenerative solutions** .*
FSB2024.12.iii	The assessed entity progresses in line with its target.	NEW. Reflecting the importance of delivering on targets.		
FSB2024.13.i	The assessed entity transparently identifies key sectors, clients and investees to engage with on nature-related impacts.	NEW. Alignment with the corresponding indicator on climate (8i)		
FSB2024.13.ii	The assessed entity engages with these clients and investees to influence and support them to set strategies for nature-protection and restoration.	MODIFIED B13.Ea to more clearly address all sub-sectors by not referring to downstream activities.	*B13.Ea*	*The financial institution discloses nature- and biodiversity-related impacts as one of its engagement topics/priorities with companies it provides financial services to. AND*
		REMOVED. Setting requirements on downstream actors seems less feasible at this point when considering all sub-sectors	*B13.Eb*	*The financial institution provides evidence that it requires companies to which it provides financial services to have a strategy addressing the companies' nature- and biodiversity-related impacts. AND*

FSB2024.13.iii	The assessed entity engages in partnerships to influence and support sectors, clients and investees to act on their nature-related impacts.	REPHRASING OF B13.Ec to simplify phrasing and more clearly address all sub-sectors	*B13.Ec*	*The financial institution provides evidence that it collectively engages with companies it provides financial services to on the topic of their nature- and biodiversity-related impacts.*
FSB2024.14.i	The assessed entity has a strategy for providing of products, services and capital to support the climate adaptation and resilience of society.	NEW. Climate adaptation and resilience are increasingly important. The element aims to understand to what extent financial institutions has started to focus on these.		
FSB2024.14.ii	The assessed entity provides at least one example of how its products, services and capital supports the climate adaptation and resilience of society.	NEW. Climate adaptation and resilience are increasingly important. The element aims to understand to what extent financial institutions has started to focus on these.		
FSB2024.15.i	The assessed entity monitors its scope 1-2 emissions	NEW. Scope 1-2 were lacking among the elements despite being an integrated part of any Net Zero target		
FSB2024.15.ii	The assessed entity monitors the emissions resulting from its associated financing activities (Scope 3 category 15).	REPHRASED B6.Ea to clarify the aim to focus on outcome rather than the disclosure as such.	*B6.Ea*	*The financial institution discloses its financed emissions resulting from its financing activities. AND*

FSB2024.15.iii	The assessed entity monitors other scope 3 categories, by category	NEW. Scope 3 other than financed emissions was lacking among the elements referring to emission targets despite being an integrated part of any Net Zero target. As scope 3 reporting vary in quality disclosure per category is important from an analytical perspective.		
FSB2024.15.iv	The assessed entity transparently details the methodology applied in their footprint calculation	MODIFIED B6.Eb. Expanded to focus on the wider methodology beyond coverage and data quality as those are not sufficient to understand the quality of the disclosure	*B6.Eb*	*The financial institution discloses the coverage of emissions and the data quality (e.g. industry averages, actual real-world emissions) across its emissions reported under a).*
FSB2024.16.i	The assessed entity has a long-term target to reach net zero emissions by latest 2050 across its scope 1-3 emissions, including its financed emissions	NEW (REPLACES B7.Ea). Net Zero targets are, by definition, supposed to include all emissions across scopes.		
		REMOVED (REPLACED by 16i) as the scope (financed emissions) is too narrow for a net zero target	*B7.Ea*	*The financial institution discloses a target to reach net-zero financed emissions by 2050. AND*
FSB2024.16.ii	The assessed entity has one or more interim targets for latest 2030 (e.g. 2025 and 2030) aligned with a 1.5C trajectory.	MODIFIED. Combines B7.Eb och B7.Ec to more clearly define the expectations of these targets.	*B7.Eb*	*The financial institution discloses interim targets (e.g. 2025 and 2030). AND*
			B7.Ec	*The financial institution discloses a target to reduce its financed emissions by at least 45% by 2030. AND*

FSB2024.16.iii	The assessed entity has established a transition plan covering its own operations, supply chain and portfolio.	NEW. The importance of transition plans is increasing. This element intends to give a first indication regarding their existence. Coming iterations may add more elements regarding transition plans.		
FSB2024.16.iv	The financial institution´s scope 1-3 emissions reduce in line with its interim targets.	MODIFIED B7.Ed. Rephrased to more clearly indicate the scope of the target and clarify that focus is on the target delivery rather than the reporting as such.	*B7.Ed*	*The financial institution discloses progress towards its targets on an annual basis.*
FSB2024.17.i	The assessed entity discloses the breakdown of clients and/or beneficiaries by income group.	MODIFIED. Split of C32.Ea to distinguish between individuals and companies.	*C32.Ea*	*The financial institution discloses the breakdown of clients/ beneficiaries by income group/company size (e.g. by number of employees/revenue). AND*
FSB2024.17.ii	The assessed entity discloses the amount and/or share (in monetary terms) of products, services and capital provided to usually excluded group, defined by the assessed entity itself.	MODIFIED. Split of C32.Eb to distinguish between individuals and companies. Alignment in wording with other elements on provision of products, services and capital.	*C32.Eb*	*The financial institution discloses the amount of financing to womenowned businesses OR to another usually excluded group, defined by the financial institution itself. AND*
FSB2024.18.i	The assessed entity discloses the breakdown of clients and/or beneficiaries by company size (e.g. by number of employees/revenue).	MODIFIED. Split of C32.Ea to distinguish between individuals and companies.	*C32.Ea*	*The financial institution discloses the breakdown of clients/ beneficiaries by income group/company size (e.g. by number of employees/revenue). AND*

FSB2024.18.ii	The assessed entity discloses the amount and/or share (in monetary terms) products, services and capital provided to small-and medium-sized enterprises.	MODIFIED C32.Ec. Alignment in wording with other elements on provision of products, services and capital.	*C32.Ec*	*The financial institution discloses the amount of financing to small- and medium-sized enterprises. AND*
FSB2024.18.iii	The assessed entity discloses the amount and/or share (in monetary terms) of products, services and capital provided to women-owned businesses	MODIFIED. Split of C32.Eb to distinguish between individuals and companies. Alignment in wording with other elements on provision of products, services and capital.	*C32.Eb*	*The financial institution discloses the amount of financing to womenowned businesses OR to another usually excluded group, defined by the financial institution itself. AND*
FSB2024.19.i	The assessed entity discloses its operation by country (e.g. by number of employees or revenue).	NEW. Added for consistency with 17 and 18		
FSB2024.19.ii	The assessed entity discloses the amount and/or share (in monetary terms) products, services and capital provided to low-income and lower-middle income countries.	Modification of B32.Ed. Alignment with similar indicators on provision of products, services and capital. Changed language to more clearly show relevance to different sub-sectors.	*C32.Ed*	*The financial institution discloses the amount of financing to lowincome, developing countries.*
FSB2024.19.iii	The assessed entity discloses its processes for avoiding divestment from low-income and lower-middle countries as unintended consequences of its sustainability strategies and targets.	NEW. This element intends to investigate the awareness and action taken by financial institutions to avoid adverse social and environmental effects of sustainability policies		

FSB2024.19.iv	The assessed entity specifies its prioritized markets for provision of products, services and capital to low-income and lower-middle income countries.	NEW. The element intends to give a better understanding of how such markets are prioritized across the sector.		
FSB2024.20.i	The assessed entity´s risk assessment process includes risks associated with the ILO fundamental rights at work for those impacted by its provision of products, services and capital.	NEW. Social impacts on workers due to provision of products, services and capital is an emerging topic for financial institutions to address.		
FSB2024.20.ii	The assessed entity has a process for mitigating such risks when identified.	NEW. Social impacts on workers due to provision of products, services and capital is an emerging topic for financial instructions to address.		
FSB2024.21.i	The assessed entity has established a living wages policy which considers those impacted by its provision of products, services and capital.	NEW. Among topics covered by 20, living wages impacts for workers due to provision of products, services and capital is an emerging topic for financial institutions to address.		
FSB2024.21.ii	The assessed entity has a time-bound strategy to reduce risks of non-living wages associated with its provision of products, services and capital.	NEW Among topics covered by 20, living wages impacts for workers due to provision of products, services and capital is an emerging topic for financial institutions to address.		

FSB2024.21.iii	The assessed entity demonstrates progress in this area	NEW Among topics covered by 20, living wages impacts for workers due to provision of products, services and capital is an emerging topic for financial institutions to address.		
FSB2024.22.i	The assessed entity has a process for identifying the social risks associated with its provision of products, services and capital in relation to the net zero transition.	NEW. Just transition is an emerging topic for financial institutions to address		
FSB2024.22.ii	The process considers workers and other concerned stakeholders.	NEW. Just transition is an emerging topic for financial institutions to address		
FSB2024.22.iii	The assessed entity has a process for mitigating such risks.	NEW. Just transition is an emerging topic for financial institutions to address		
FSB2024.22.iv	The assessed entity has a process for enabling social opportunities of the transition associated with its provision of products, services and capital.	NEW. Just transition is an emerging topic for financial institutions to address		
FSB2024.22.v	The assessed entity includes just transition in its stewardship activities	NEW. Just transition is an emerging topic for financial institutions to address		

FSB2024.23.i CSI1	The assessed entity has a publicly available policy statement committing it to respect human rights, which is approved by the highest governance body.	UNCHANGED CSI element.	*C15.Ea*	*The financial institution has a publicly available policy statement committing it to respect human rights, which is approved by the highest governance body.*
FSB2024.24.i CSI3	The assessed entity describes the process(es) to identify its human rights risks and impacts in specific locations or activities covering its own operations.	UNCHANGED CSI element.	*C17.Ea*	*The financial institution describes the process(es) to identify its human rights risks and impacts in specific locations or activities covering its own operations.*
FSB2024.24.ii CSI3	The assessed entity describes the process(es) to identify its human rights risks and impacts in specific locations or activities through relevant business relationships.	UNCHANGED CSI element. Note however that this now focus on direct suppliers.	*C17.Eb*	*The financial institution describes the process(es) to identify its human rights risks and impacts in specific locations or activities through relevant business relationships.*
FSB2024.24.iii (CSI3)	The assessed entity describes the process(es) used to identify the specific human rights risks and impacts associated with its provision of products, services and capital.(FSB specific).	NEW. Downstream impacts added as a separate element for consistency of existing CSI elements across WBA benchmarks. Note that impact downstream was considered as part of C17.Eb in the previous edition.		
FSB2024.25.i CSI4	The assessed entity describes its process(es) for assessing its human rights risks and discloses what it considers to be its salient human rights issues. This description includes how relevant factors are taken into account, such as geographical, economic, social and other factors.	UNCHANGED CSI element. Note however that this now focus on direct suppliers and own operations.	*C18.Ea*	*The financial institution describes its process(es) for assessing its human rights risks and discloses what it considers to be its salient human rights issues. This description includes how relevant factors are taken into account, such as geographical, economic, social and other factors.*

FSB2024.25.ii (CSI4)	The assessed entity describes its process(es) for assessing its human rights risks and discloses what it considers to be its salient human rights issues of the products, services and capital it offers. This description includes how relevant factors are taken into account, such as geographical, economic, social and other factors. (FSB specific). OR	NEW. Downstream impacts added as a separate element for consistency of existing CSI elements across WBA benchmarks. Note that impact downstream was considered as part of C18.Ea in the previous edition.		
FSB2024.25.iii CSI4	The assessed entity publicly discloses the results of its assessments, which may be aggregated across its operations and locations.	UNCHANGED CSI element. Note however that this now focus on direct suppliers and own operations.	*C18.Eb*	*The financial institution publicly discloses the results of its assessments, which may be aggregated across its operations and locations.*
FSB2024.25.iv (CSI4)	The assessed entity publicly discloses the results of its assessments of the products, services and capital it offers, which may be presented in an aggregated way. (FSB specific).	NEW. Downstream impacts added as a separate element for consistency of existing CSI elements across WBA benchmarks. Note that impact downstream was considered as part of C18.Eb in the previous edition.		
FSB2024.26.i CSI5	The assessed entity describes its global system to take action to prevent, mitigate or remediate its salient human rights issues, AND this includes a description of how its global system applies to its supply chain.	UNCHANGED CSI element. Note however that this now focus on direct suppliers and own operations.	*C19.Ea*	*The financial institution describes its global system to take action to prevent, mitigate or remediate its salient human rights issues, AND this includes a description of how its global system applies to its supply chain.*

FSB2024.26.ii (CSI5)	The assessed entity describes its global system to take action to prevent, mitigate or remediate its salient human rights issues of the products, services and capital it offers. (FSB specific). OR	Downstream impacts added as a separate element for consistency of existing CSI elements across WBA benchmarks. Note that impact downstream was considered as part of C19.Ea in the previous edition.		
FSB2024.26.iii CSI5	The assessed entity provides an example of the specific conclusions reached and actions taken or to be taken on at least one of its salient human rights issues as a result of assessment processes in at least one of its activities/operations in the last three years.	UNCHANGED CSI element. Note however that this now focus on direct suppliers and own operations.	*C19.Eb*	*The financial institution provides an example of the specific conclusions reached and actions taken or to be taken on at least one of its salient human rights issues as a result of assessment processes in at least one of its activities/operations in the last three years.*
FSB2024.26.iv (CSI5)	The assessed entity provides an example of the specific conclusions reached and actions taken or to be taken on at least one of its salient human rights issues of it's the products, services and capital it offers as a result of assessment processes in at least one of its activities in the last three years. (FSB specific). OR	Downstream impacts added as a separate element for consistency of existing CSI elements across WBA benchmarks. Note that impact downstream was considered as part of C19.Eb in the previous edition.		
FSB2024.27.i CSI6	The assessed entity discloses the categories of stakeholders whose human rights have been or may be affected by its activities.	UNCHANGED CSI element.	*C20.Ea*	*The financial institution discloses the categories of stakeholders whose human rights have been or may be affected by its activities.*

FSB2024.27.ii CSI6	The assessed entity provides at least two examples of its engagement with stakeholders whose human rights have been or may be affected by its activities (or their legitimate representatives or multi-stakeholder initiatives) in the last two years.	UNCHANGED CSI element.	*C20.Eb*	*The financial institution provides at least two examples of its engagement with stakeholders whose human rights have been or may be affected by its activities (or their legitimate representatives or multi-stakeholder initiatives) in the last two years.*
FSB2024.28.i CSI8	The assessed entity indicates that it has one or more channel(s)/ mechanism(s), or participates in a shared mechanism, accessible to all external individuals and communities who may be adversely impacted by the company (or individuals or organisations acting on their behalf or who are otherwise in a position to be aware of adverse impacts), to raise complaints or concerns.	UNCHANGED CSI element.	*C21.Ea*	*The financial institution indicates that it has one or more channel(s)/mechanism(s), or participates in a third-party or shared mechanism, accessible to all workers to raise complaints or concerns related to the financial institution.*
FSB2024.29.i CSI2	The assessed entity has a publicly available policy statement committing it to respecting the human rights that the ILO has declared to be fundamental rights at work, which is approved by the highest governance body.	UNCHANGED CSI element.	*C16.Ea*	*The financial institution has a publicly available policy statement committing it to respecting the human rights that the ILO has declared to be fundamental rights at work, which is approved by the highest governance body.*
FSB2024.29.ii CSI2	The assessed entity has a publicly available statement of policy that expects its direct business relationships to commit to respecting the human rights that the ILO has declared to be fundamental rights at work.	UNCHANGED CSI element.	*C16.Eb*	*The financial institution has a publicly available statement of policy that expects its business relationships to commit to respecting the human rights that the ILO has declared to be fundamental rights at work.*

FSB2024.30.i CSI7	The assessed entity indicates that it has one or more channel(s)/ mechanism(s), or participates in a third-party or shared mechanism, accessible to all workers to raise complaints or concerns related to the company.	UNCHANGED CSI element.	*C22.Ea*	*The financial institution indicates that it has one or more channel(s)/mechanism(s), or participates in a shared mechanism, accessible to all external individuals and communities who may be adversely impacted by the financial institution (or individuals or organizations acting on their behalf or who are otherwise in a position to be aware of adverse impacts), to raise complaints or concerns.*
FSB2024.31.i CSI9	The assessed entity has a publicly available policy statement committing it to respect the health and safety of workers.	UNCHANGED CSI element.	*C23.Ea*	*The financial institution has a publicly available policy statement committing it to respect the health and safety of workers.*
FSB2024.31.ii CSI9	The assessed entity discloses quantitative information on health and safety for its workers.	UNCHANGED CSI element.	*C23.Eb*	*The financial institution discloses quantitative information on health and safety for its workers.*
FSB2024.31.iii CSI9	The assessed entity has a publicly available statement of policy that expects its suppliers to commit to respecting the health and safety of their workers.	UNCHANGED CSI element.	*C23.Ec*	*The financial institution has a publicly available statement of policy that expects its business relationships to commit to respecting the health and safety of their workers.*
FSB2024.31.iv CSI9	The assessed entity discloses how it monitors the health and safety performance of its suppliers.	UNCHANGED CSI element.	*C23.Ed*	*The financial institution discloses how it monitors the health and safety performance of its business relationships.*
FSB2024.32.i CSI10	The assessed entity discloses a time-bound target for paying all workers a living wage or that it has achieved paying all workers a living wage.	UNCHANGED CSI element.	*C24.Ea*	*The financial institution discloses a time-bound target for paying all workers a living wage or that it has achieved paying all workers a living wage.*

FSB2024.32.ii CSI10	The assessed entity describes how it determines a living wage for the regions where it operates.	UNCHANGED CSI element.	*C24.Eb*	*The financial institution describes how it determines a living wage for the regions where it operates.*
FSB2024.32.iii CSI10	The assessed entity describes how it works to support the payment of a living wage by its suppliers.	UNCHANGED CSI element.	*C24.Ec*	*The financial institution describes how it works to support the payment of a living wage by its business relationships.*
FSB2024.33.i CSI11	The assessed entity publicly states that workers shall not be required to work more than 48 hours in a regular work week or 60 hours including overtime.	UNCHANGED CSI element.	*C25.Ea*	*The financial institution publicly states that workers shall not be required to work more than 48 hours in a regular work week or 60 hours including overtime.*
FSB2024.33.ii CSI11	The assessed entity publicly states that all overtime work must be consensual and be paid at a premium rate.	UNCHANGED CSI element.	*C25.Eb*	*The financial institution publicly states that all overtime work must be consensual and be paid at a premium rate.*
FSB2024.33.iii CSI11	The assessed entity has a public expectation that its suppliers shall not require workers to work more than 48 hours in a regular work week or 60 hours including overtime.	UNCHANGED CSI element.	*C25.Ec*	*The financial institution has a public expectation that its business relationships shall not require workers to work more than 48 hours in a regular work week or 60 hours including overtime.*
FSB2024.34.i CSI12	The assessed entity discloses the proportion of its total direct operations workforce covered by collective bargaining agreements.	UNCHANGED CSI element.	*C26.Ea*	*The financial institution discloses the proportion of its total direct operations workforce covered by collective bargaining agreements.*
FSB2024.34.ii CSI12	The assessed entity describes how it works to support the practices of its suppliers in relation to freedom of association and collective bargaining.	UNCHANGED CSI element.	*C26.Eb*	*The financial institution describes how it works to support the practices of its business relationships in relation to freedom of association and collective bargaining.*

FSB2024.35.i CSI13	The assessed entity discloses the proportion of its total direct operations workforce for each employee category by age group.	UNCHANGED CSI element.	*C27.Ea*	*The financial institution discloses the proportion of its total direct operations workforce for each employee category by age group.*
FSB2024.35.ii CSI13	The assessed entity discloses the proportion of its total direct operations workforce for each employee category by gender.	UNCHANGED CSI element.	*C27.Eb*	*The financial institution discloses the proportion of its total direct operations workforce for each employee category by gender.*
FSB2024.35.iii CSI13	The assessed entity discloses the proportion of its total direct operations workforce for each employee category by race or ethnicity.	UNCHANGED CSI element.	*C27.Ec*	*The financial institution discloses the proportion of its total direct operations workforce for each employee category by race or ethnicity.*
FSB2024.35.iv CSI13	The assessed entity discloses the proportion of its total direct operations workforce for each employee category by one or more additional indicators of diversity (e.g. disability, marital and family status, etc).	UNCHANGED CSI element.	*C27.Ed*	*The financial institution discloses the proportion of its total direct operations workforce for each employee category by one or more additional indicators of diversity (e.g. disability, sexual identity and marital and family status, etc.).*
FSB2024.36.i CSI14	The assessed entity has a public commitment to gender equality and women's empowerment.	UNCHANGED CSI element.	*A3.Ea*	*The financial institution has a public commitment to gender equality and women's empowerment. AND*
FSB2024.36.ii CSI14	The assessed entity discloses one or more time-bound targets on gender equality and women's empowerment.	UNCHANGED CSI element.	*A3.Eb*	*The financial institution discloses one or more time-bound targets on gender equality and women's empowerment. AND*

FSB2024.36.iii CSI14	The assessed entity discloses the ratio of the basic salary and remuneration of women to men in its total direct operations workforce for each employee category, by significant locations of operation.	UNCHANGED CSI element.	*A3.Ee*	*The financial institution discloses the ratio of the basic salary and remuneration of women to men in its total direct operations workforce for each employee category, by significant locations of operation. AND*
FSB2024.36.iv CSI14	The assessed entity discloses that it takes action to address any pay gaps. (FSB specific).	UNCHANGED CSI element.	*A3.Ef*	*The financial institution discloses that it takes action to address any pay gaps.*
FSB2024.37.i CSI15	The assessed entity has a public commitment to protect personal data.	UNCHANGED CSI element.	*C28.Ea*	*The financial institution has a public commitment to protecting personal data.*
FSB2024.37.ii CSI15	The assessed entity has a global publicly available privacy statement in relation to the collection, sharing and access to personal data.	UNCHANGED CSI element.	*C28.Eb*	*The financial institution has a global publicly available privacy statement in relation to the collection, sharing and access to personal data.*
FSB2024.38.i CSI16	The assessed entity has a publicly available global tax strategy, which is approved by the highest governance body.	UNCHANGED CSI element.	*C29.Ea*	*The financial institution has a publicly available global tax strategy, which is approved by the highest governance body.*
FSB2024.38.ii CSI16	A governance body or executive-level position is tasked with accountability for compliance with the assessed entity's global tax strategy.	UNCHANGED CSI element.	*C29.Eb*	*A governance body or executive-level position is tasked with accountability for compliance with the financial institution's global tax strategy.*
FSB2024.38.iii CSI16	The assessed entity clearly discloses the amount of corporate income tax paid for each tax jurisdiction where the assessed entity is a resident for tax purposes.	UNCHANGED CSI element.	*C29.Ec*	*The financial institution clearly discloses the amount of corporate income tax paid for each tax jurisdiction where the financial institution is a resident for tax purposes.*

FSB2024.39.i CSI17	The assessed entity has a publicly available policy statement prohibiting bribery and corruption.	UNCHANGED CSI element.	*C30.Ea*	*The financial institution has a publicly available policy statement prohibiting bribery and corruption.*
FSB2024.39.ii CSI17	The assessed entity describes the process(es) to identify its bribery and corruption risks and impacts in specific locations or activities covering its own operations.	UNCHANGED CSI element.	*C30.Eb*	*The financial institution describes the process(es) to identify its bribery and corruption risks and impacts in specific locations or activities covering its own operations.*
FSB2024.39.iii CSI17	The assessed entity includes anti-bribery and anti-corruption clauses in its contracts with direct business relationships.	UNCHANGED CSI element.	*C30.Ec*	*The financial institution includes anti-bribery and anti-corruption clauses in its contracts with business relationships.*
FSB2024.39.iv CSI17	The assessed entity indicates that it has a confidential and anonymous channel/mechanism accessible to all stakeholders to raise bribery and corruption concerns and complaints without fear of reprisals.	UNCHANGED CSI element.	*C30.Ed*	*The financial institution indicates that it has a confidential and anonymous channel/mechanism accessible to all stakeholders to raise bribery and corruption concerns and complaints without fear of reprisals.*