



GREEN BANKING POLICY: IDLC FINANCE LIMITED

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ABBREVIATIONS

CR Fund	Climate Risk Fund
CRM	Credit Risk Management
CSR	Corporate Social Responsibility
E&S	Environmental and Social
ERM	Environmental Risk Management
GB&CSR	Green Banking and CSR
FI	Financial Institution
GBU	Green Banking Unit
GHG	Green House Gas
GOG	Green Office Guideline
HR	Human Resources

CHAPTER 1: BACKGROUND

1.1 GREEN BANKING

Environmental pollution and climate change leading to global warming are one of the three most discussed issues worldwide. These issues, mostly caused by human activities, are not only affecting our economy and our living standards, but our very existence is dependent on the efficient management of these issues.

The geographic location of Bangladesh makes it one of the most climate vulnerable regions of the world. Lack of awareness, environmental education, compliance and negligence on the part of the businesses and the mass people are also resulting in fast deterioration of the environment. This situation can only be improved through coordinated efforts from the government, private sector, and individuals. And banks and FIs are well positioned to act as catalysts to support and supplement these efforts aimed at a greener environment.

“Green Banking” is the operation of the financial sector with special focus on the environmental, ecological and social factors, targeting conservation of nature and natural resources. The term broadly encompasses awareness creation and promotion of environment-friendly projects and practices, and reduction of overall carbon footprint from both its financing and in-house operations. Through green banking, the FIs are not only required to improve their own standards, but also play an active role in demanding the same from its stakeholders as well.

1.2 SCOPE AND OBJECTIVE

The Green Banking Policy of IDLC has been prepared in light of the “Policy Guidelines for Green Banking” issued by the GB&CSR Department of Bangladesh Bank (GBCSRD Circular No 4) on August 11, 2013. The objective of this policy is to institutionalize Green Banking across IDLC by focusing on the following major aspects:

- (i) Governance
- (ii) E&S Risks in Credit Risk Management
- (iii) In-house Environment Management
- (iv) Green Finance, Products and Marketing
- (v) Climate Risk Fund
- (vi) Training, Awareness and Green Events
- (vii) Disclosure and Reporting

Documents consulted for preparation of this Policy has been detailed in Annex 1.

1.3 IMPLEMENTATION

As per the “Policy Guidelines for Green Banking” issued by the GB&CSR Department of Bangladesh Bank (GBCSRD Circular No 4) on August 11, 2013, the implementation of Green Banking activities has to be completed in three phases:

- (i) **Phase I:** by June 30, 2014;
- (ii) **Phase II:** by December 31, 2014; and
- (iii) **Phase III:** by June 30, 2015

Specific deadline for completion of each activity has been detailed in different chapters of this Policy document.

1.4 BENEFITS

In addition to the inherent benefits of better environmental management; new business opportunities; responsible resource consumption and reduced GHG emission; and reduce capital expenditure and operational costs, compliance with the Green Banking Policy shall entitle the FI to the following benefits:

- (i) Bangladesh Bank shall award points on Management component while computing CAMELS rating, which will have a significant impact on the overall rating of each FI;
- (ii) Bangladesh Bank shall declare the names of the top ten FIs for their overall performance in green banking activities in the Bangladesh Bank website; and
- (iii) Bangladesh Bank shall actively consider green banking activities/practices of an FI while according permission for opening new FI branch.

CHAPTER 2: GOVERNANCE

2.1 FORMATION OF A GREEN BANKING UNIT

IDLC shall form a Green Banking Unit (GBU) with representation from different departments in IDLC. The GBU shall be responsible for the design, implementation and evaluation of relevant green banking issues across the organization within the stipulated timeline, as well as for periodic reporting to the GB&CSR Department of Bangladesh Bank.

Composition of the GBU, and any change thereafter, shall be approved by the Management Committee of IDLC.

2.2 FUND ALLOCATION FOR GREEN FINANCING

To increase share of “Green” financing in the overall financing portfolio, IDLC shall maintain a fixed percentage of the annual disbursement target for investing in green projects / sectors.

IDLC shall also focus on availing relevant refinancing facilities of Bangladesh Bank, and/or low cost funds from multilateral organizations to offer financing to clients at flexible terms.

2.3. EXECUTION

Particulars	Executing Body	Deadline
2.1 Formation of the Green Banking Unit	Management Committee	June 30, 2014
2.2. Fund Allocation for Green Financing	Business Units	June 30, 2014

CHAPTER 3: E&S RISKS IN CREDIT RISK MANAGEMENT

3.1. INCORPORATION OF ENVIRONMENTAL RISK IN CRM

Environmental, social and climate change risks shall form part of the overall credit risk methodology of IDLC to assess a prospective borrower from both credit risk and E&S risk perspectives.

In this regard, IDLC already complies with the “Environmental Risk Management (ERM) Guidelines for Banks and Financial Institutions in Bangladesh” dated January 2011, and shall comply with all subsequent circulars, regulations and/or guidelines issued by Bangladesh Bank and other relevant regulatory bodies. Accordingly appropriate internal policies, due diligence checklists, audit guidelines and reporting formats has been prepared and shall be updated regularly.

3.2. SECTOR-SPECIFIC ENVIRONMENTAL POLICIES

IDLC already follows the guidelines prescribed in “The Environment Conservation Rules, 1997” issued by the Ministry of Environment and Forest of the Government of the People’s Republic of Bangladesh; and “Environmental Risk Management (ERM) Guidelines for Banks and Financial Institutions in Bangladesh” issued by Bangladesh Bank in January 2011, while financing in any of the following sectors: .

- (i) Agriculture;
- (ii) Agri-business (Poultry and Dairy);
- (iii) Agro farming;
- (iv) Leather(Tannery);
- (v) Fisheries;
- (vi) Textile and Apparels;
- (vii) Renewable Energy;
- (viii) Pulp and Paper;
- (ix) Sugar and Distilleries;
- (x) Construction and Housing;
- (xi) Engineering and Basic Metal;
- (xii) Chemicals (Fertilizers, Pesticides and Pharmaceuticals);
- (xiii) Rubber and Plastic Industry;
- (xiv) Hospital/Clinic;
- (xv) Chemical Trading;
- (xvi) Brick Manufacturing; and
- (xvii) Ship breaking

IDLC shall also adopt guidelines in all subsequent laws and regulations issued by relevant regulatory bodies. Any change / deviation has to be approved by the Management Committee of IDLC, and where applicable, shall be placed for Execution Committee and/or Board Approval.

3.3. FI SPECIFIC ERM PLAN AND GUIDELINES

In addition to national laws and regulations, IDLC shall adopt internationally accepted standards and practices to bring in place a more rigorous E&S Risk Management framework. Environmental and Social Impact Assessment (ESIA) shall be conducted for large projects, where applicable.

IDLC already has memberships with the United Nations Global Compact (UNGC) and United Nations Environment Program Finance Initiative (UNEP FI), and IDLC voluntarily follows their prescribed principles and guidelines; however, going forward, these will be incorporated in IDLC's in-house ERM Plan¹.

3.4. EXECUTION

Particulars	Executing Body	Deadline
3.1. Incorporation of Environmental Risk in CRM	Business Units; CRM	June 30, 2014
3.2. Sector-specific Environmental Policies	Business Units; CRM	December 31, 2014
3.3. FI Specific ERM Plan and Guidelines	Green Banking Desk*; Business Units; CRM	December 31, 2014

*Dedicated person to be appointed for this role

¹ IDLC-specific ERM Plans and Guidelines, and required documents, checklists and clauses, shall be drafted and implemented with assistance from FI Konsult, the external consultant appointed by IDLC and being jointly financed by IDLC and FMO for implementation of ESMS (Environmental and Social Risk Management System) across the organization.

CHAPTER 4: IN-HOUSE ENVIRONMENT MANAGEMENT

4.1. GREEN OFFICE GUIDELINE

IDLC shall prepare a “Green Office Guideline (GOG)” that will consist of a set of general instructions to be followed across the organization. The main objective of the GOG would be better management of in-house environmental issues; responsible utilization of electricity, water, paper and energy; and maintenance of a cleaner and more hygienic office environment, in participation of all the employees of IDLC.

The GOG shall be approved by the Management Committee, and reviewed on an annual basis.

4.2. INVENTORY MANAGEMENT

IDLC shall maintain an inventory on the consumption of electricity, water, paper and energy across all its branches. This information shall provide a baseline for IDLC to undertake various measures aimed at gradually reducing consumption of these resources. The format prescribed in the “Policy Guidelines for Green Banking” issued by the GB&CSR Department of Bangladesh Bank (GBCSRD Circular No 4; dated August 11, 2013) shall be followed for this purpose.

Specific targets shall be set up every year, in the following manner, to reduce consumption through various initiatives throughout the year:

- (i) Branch-specific annual reduction targets; and
- (ii) Per capita consumption per year per branch

Progress of each branch against each parameters shall be subject to periodic internal audit and validation.

4.3. GREEN BRANCHES

IDLC shall strive to make both its existing and new branches “Green” by focusing on two basic parameters:

- a) Source reduction and waste minimization strategy in terms of resources like electricity, water, paper, energy (petrol / gas / octane / diesel) etc.;
- b) Adopting the 3R principle of Reduce, Reuse and Recycle, in terms of both materials and equipments; and

Initiatives in this regard will include, but not be limited to, the following:

- (i) Maximum use of sunlight / natural light during day time;
- (ii) Use of more renewable energy in office premises, such as solar panels etc.;
- (iii) Installation of energy efficient devices, such energy saving bulbs, air conditioning systems etc.;
- (iv) Installation of spring taps / sensory taps to reduce water consumption, in both washrooms and dining rooms;
- (v) More use of recycled water and paper, where feasible;

IDLC shall strive to achieve the “Green Branch” certification of Bangladesh Bank for all its branches, as per their given criteria soon to be made available.

4.4. GREEN TECHNOLOGIES

IDLC shall resort to more environment-friendly technologies aimed at greater work efficiency; reduction of electricity, paper and energy consumption, and subsequent GHG emission; and reduced CapEx in terms of IT infrastructure.

Facilities such as virtual meetings through video conferencing; server virtualization; state-of-the-art branch connectivity systems; online operational, approval and payment systems, e-statement generation for employees and clients for reducing paper consumption etc. are already in place.

Going forward, IDLC shall focus on the reduction and reuse of materials and equipments as well, where feasible.

4.5. EXECUTION

Particulars	Executing Bodies	Deadline
4.1. Green Office Guideline	CSR, IT, Admin	June 30, 2014
4.2. Inventory Management	Admin, ICC, Branch-in-charges	June 30, 2014
4.3. Green Branches	Admin	December 31, 2014
4.4. Green Technologies	IT , Business and Support Units	December 31, 2014

CHAPTER 5: GREEN FINANCE, PRODUCTS AND MARKETING

5.1. GREEN FINANCE

IDLC shall focus on Green Finance activities in the following manner:

- (i) **Phase I:** IDLC shall maintain a specific target every year for investment in environment-friendly sectors and/or projects. Preference shall be given to environmental infrastructure projects including, but not limited to, adoption of renewable energy and/or energy-efficient technology; supply of clean water; establishment of effluent and/or waste water treatment plant, solid and hazardous waste disposal plant, bio-gas plant, bio-fertilizer plant etc. Moreover, IDLC shall also format Consumer credit programs to promote better environmental practices among clients;
- (ii) **Phase II:** IDLC shall identify specific environmentally harmful activities and reduce its financing activities in those areas; and target certain percentage of its portfolio to consist of eco-friendly and environmental loans;

IDLC shall try to avail the refinancing facility from Bangladesh Bank in renewable energy and environment-friendly projects, as per the GBCSRD Circular No 2, dated July 1, 2013, and any subsequent circulars issued hereinafter. IDLC shall also try to avail relevant financing facilities offered by various multilateral organizations.

5.2. GREEN MARKETING

Green Marketing refers to the marketing and promotion of products and services that are environmentally-friendly themselves, or are positioned and marketed in an environment-friendly manner. Such efforts shall not only provide the promised environmental benefits, but also help increase awareness among the client groups.

IDLC shall engage in Green Marketing by:

- (i) Adding value to existing product portfolio by including environmental features; and
- (ii) Using environmental themes and/or causes in marketing and promotional activities

5.3. DESIGN AND INTRODUCTION OF INNOVATIVE PRODUCTS

Besides mitigating negative environmental impacts through its products and services, IDLC shall actively design and introduce innovative green products addressing core environmental and climate change issues of Bangladesh.

Design of such products shall be done upon consultation with the GB&CSR Department of Bangladesh Bank, and as per international best practices.

5.4. EXECUTION

Particulars	Executing Bodies	Deadline
5.1. Green Finance	Business Units	Phase I: June 30, 2014
	CRM	Phase II: December 31, 2014
5.2. Green Marketing	Business Units; Marketing Communications	June 30, 2014
5.3. Design and Introduction of Innovative Products	Business Units	June 30, 2015

CHAPTER 6: CLIMATE RISK FUND

6.1. CREATION AND UTILIZATION OF CLIMATE RISK FUND

IDLC shall have in place a “Climate Risk Fund (CR Fund)” targeting climate-vulnerable areas, namely flood, cyclone and draught prone areas in Bangladesh.

The CR Fund shall be utilized in the following manners:

- (i) Commercial Financing of economic activities in climate-vulnerable regions
 - a. Regular interest rates shall be charged, without additional risk premiums; and
 - b. Financing will be extended both in case of emergencies, as well as on a regular basis;
- (ii) CSR Projects
 - a. Areas will include, but not be limited to, post-disaster rehabilitation; skills development and alternative livelihood; climate adaptability; climate resilient housing facilities etc.;
 - b. Such activities shall be conducted on a regular basis;

All activities, commercial financing or CSR, utilizing the CR Fund shall be implemented jointly with different NGOs and/or MFIs active in climate vulnerable regions.

6.2. EXECUTION

Particulars	Executing Bodies	Deadline
6.1. Creation and Utilization of Climate Risk Fund	Creation of CR Fund: Management Committee Utilization of CR Fund: Business Units; CSR	June 30, 2014

CHAPTER 7: TRAINING, AWARENESS AND GREEN EVENTS

7.1. EMPLOYEE TRAINING

Employee training and awareness on various environmental and social issues, and green banking aspects, shall be a continuous and integral part of IDLC's human resource development process.

IDLC shall prepare a training calendar at the beginning of each year for staff training, and accordingly conduct the sessions throughout the year. At least two (2) sessions shall be conducted per quarter across different branches.

Moreover, these issues shall also be included in the orientation sessions for new recruits.

7.2. CLIENT AWARENESS AND GREEN EVENTS

IDLC shall arrange, individually and/or jointly, and sponsor seminars, workshops or events aimed at improving understanding and awareness on E&S issues by clients and other stakeholder groups, and minimizing negative environmental impacts of IDLC's own operations.

IDLC shall conduct such sessions in two phases:

- (i) **Phase I:** Client awareness on E&S issues on a continuous basis; and
- (ii) **Phase II:** Rigorous programs on a continuous basis to encourage and influence clients and business houses to comply with environmental regulations, undertake resource efficient and environmental activities etc.

Moreover, CSR activities such as tree plantation shall also be considered as Green events.

IDLC shall arrange at least three (3) such events every year.

7.3. EXECUTION

Particulars	Executing Bodies	Deadline
7.1. Employee Training	GBU, HR, Branch-in-charges	June 30, 2014
7.2. Client Awareness and Green Events	Business Units, Green Banking Desk*, Marketing Communications, CSR	Phase I: June 30, 2014
		Phase II: December 31, 2014

*Dedicated person to be appointed for this role

CHAPTER 8: DISCLOSURE AND REPORTING

8.1. REPORTING ON GREEN BANKING ACTIVITIES

Reporting on Green Banking initiatives will be conducted and upgraded in the following phases:

- (i) **Phase I:** IDLC shall report initiatives and progress in terms of implementing green banking activities to the GB&CSR Department of Bangladesh Bank on a quarterly basis, as per format prescribed in the “Policy Guidelines for Green Banking” (GBCSRD Circular No 4; dated August 11, 2013).
- (ii) **Phase II:** IDLC already publishes an independent “Sustainability Report” highlight current activities and initiatives, past performance, and future strategies. However, going forward, IDLC shall also disclose E&S performance of its major clients that shall include, but not be limited to, the E&S issues faced by the clients and how these issues were addressed and/or mitigated by the clients on their own/with assistance from IDLC; and
- (iii) **Phase III:** IDLC already complies with the Global Reporting Initiative (GRI) Guidelines for preparation of its Sustainability Report. Going forward, IDLC shall apply similar standards for its Annual Financial Report as well, while seek for external assurance of these publications by independent agencies / acceptable third party service providers. Appointment of any such third-party assurance provider shall be subject to consultation with Bangladesh Bank.

8.2. DISCLOSURE OF GREEN BANKING ACTIVITIES

IDLC shall disclose its “Green Banking” activities on its website, and continuous update the website. Also, IDLC shall make its Annual Financial Reports and Sustainability Reports available on the website, as it does now.

8.3. EXECUTION

Particulars	Executing Bodies	Deadline
8.1. Reporting on Green Banking Activities	Green Banking Desk*	Phase I: June 30, 2014
	CSR, GBU	Phase II: December 31, 2014
	Finance, CSR	Phase III: June 30, 2015
8.2. Disclosure of Green Banking Activities	GBU	June 30, 2014

*Dedicated person to be appointed for this role

CHAPTER 9: MONITORING, COORDINATION AND IMPLEMENTATION

9.1 MONITORING AND COORDINATION

The following persons shall be responsible for coordinating across all departments, monitoring results, and accordingly suggesting measures in case of any deviation.

Responsible Person	Roles and Responsibilities	Report to
Green Banking Desk*	<ul style="list-style-type: none"> (i) Collection, filing and record maintenance of all relevant external policies, circulars and guidelines, and internally developed policies, documents, checklists and memos; (ii) Day-to-day coordination across all departments regarding implementation of the Green Banking activities; (iii) Monitoring progress of green banking initiatives across different departments through periodic progress reports; (i) Reporting to the Management Committee, in case of any deviation, and taking necessary measures, in consultation with the GBU and all parties concerned; and (iv) Collection of information from all departments and accordingly preparing and submitting the quarterly report to the GB&CSR Department of Bangladesh Bank; 	Management Committee

*Dedicated person to be appointed for this role. Prior to this appointment, the activities shall be conducted by the CSR Department

9.2 IMPLEMENTATION

The Executing Bodies, as identified in the above chapters, shall be responsible for implementation of the respective areas in time. They shall also be responsible for preparation of all relevant guidelines, checklists and memos, as detailed in Annex 2, for proper approval and implementation of these activities. The consolidated list of Executing Bodies has been provided in Annex 3.

CHAPTER 10: POLICY APPROVAL AND REVIEW

10.1 APPROVING AUTHORITY

The Green Banking Policy shall be approved by the Board of Directors of IDLC. An approved copy of the policy shall accordingly be submitted to the GB&CSR Department of Bangladesh Bank.

10.2 REVIEW

The Green Banking Policy shall be reviewed once every two (2) years by the GBU. Any amendment in any provision of the Green Banking Policy shall be communicated first to the Management Committee, and accordingly be placed for approval by the Board of Directors of IDLC.

Copy of the amended policy, as approved by the Board, shall be submitted to the GB&CSR Department of Bangladesh Bank.

Annexure can be added to the original document, subject to Management approval.

ANNEX 1: RELEVANT POLICIES AND CIRCULARS

- (i) “Policy Guidelines for Green Banking” issued by the GB&CSR Department of Bangladesh Bank (GBCSRD Circular No 4) on August 11, 2013;
- (ii) “Environmental Risk Management (ERM) Guidelines for Banks and Financial Institutions in Bangladesh” dated January 2011,
- (iii) “The Environment Conservation Rules, 1997” issued by the Ministry of Environment and Forest of the Government of the People’s Republic of Bangladesh; and
- (iv) Refinancing facility from Bangladesh Bank in renewable energy and environment-friendly projects, as per the GBCSRD Circular No 2, dated July 1, 2013.

ANNEX 2: DOCUMENT REQUIREMENTS

Documents required to facilitate execution of the Green Banking activities include, but are not limited to, the following:

Particulars	Required Documents for Execution	Deadline
2.1 Green Banking Unit	Memo approving formation of the GBU	June 30, 2014
3.3 FI Specific ERM Plan and Guideline	Internal guideline incorporating international best standards and practices	December 31, 2014
4.1 Green Office guideline	Independent document serving as the “Green Office Guideline”	June 30, 2014
4.2 Inventory Management	(i) Specific format for inventory management; (ii) Action plan and framework to be followed by all branches, targeting reduction in consumption patterns; and (iii) Criteria for internal audit and validation	June 30, 2014
4.3 Green Branches	A uniform guideline to be followed across all branches / during branch extensions	December 31, 2014
5.1 Green Finance	(i) Identification and finalization of sectors attractive for IDLC; and (ii) Disbursement target in each sector for both Corporate and SME;	June 30, 2014
5.2 Green Marketing	(i) Concept paper on green marketing; and (ii) Listing of specific “green” promotional activities	June 30, 2014
6.1 Creation and Utilization of Climate Risk Fund	(i) Memo approving fund allocation to the “Climate Risk Fund”; and (ii) Framework for working with different NGOs/MFIs for utilization of the Climate Risk Fund;	June 30, 2014
7.1 Employees Training	(i) Training framework for branch-level rollout; (ii) Development of uniform training materials; and (iii) Annual training calendar for green banking	June 30, 2014
7.2 Client Awareness and Green Events	Annual event calendar	June 30, 2014
8.1 Reporting on Green Banking Activities	Checklist for information collection to include client’s environmental performance in IDLC’s Sustainability Report	December 31, 2014

ANNEX 3: EXECUTION AND DEADLINE*

Particulars	Executing Bodies	Deadline
2.1 Formation of Green Banking Unit	Management Committee	June 30, 2014
2.2. Fund Allocation for Green Financing	Business Units	June 30, 2014
3.1. Incorporation of Environmental Risk in CRM	Business Units; CRM	June 30, 2014
3.2. Sector-specific Environmental Policies	Business Units; CRM	December 31, 2014
3.3. FI Specific ERM Plan and Guidelines	Green Banking Desk; Business Units; CRM	December 31, 2014
4.1. Green Office Guideline	CSR, IT, Admin and PR	June 30, 2014
4.2. Inventory Management	Admin and PR, ICC, Branch-in-charges	June 30, 2014
4.3. Green Branches	Admin and PR, IT	December 31, 2014
4.4. Green Technologies	Business and Support Units, IT	December 31, 2014
5.1. Green Finance	Business Units; CRM	Phase I: June 30, 2014
		Phase II: December 31, 2014
5.2. Creation and Utilization of Climate Risk Fund	Creation of CR Fund: Management Committee	June 30, 2014
	Utilization of CR Fund: Business Units; CSR	
6.1. Green Marketing	Business Units; Marketing Communications	June 30, 2014
6.2. Design and Introduction of Innovative Products	Business Units	June 30, 2015
7.1. Employee Training	GBU, HR, Branch-in-charges	June 30, 2014
7.2. Client Awareness and Green Events	Business Units, GBU, CSR, Marketing Communications	Phase I: June 30, 2014
		Phase II: December 31, 2014
8.1. Reporting on Green Banking Activities	Business Units, GBU, CSR	Phase I: June 30, 2014
		Phase II: December 31, 2014
		Phase III: June 30, 2015
8.2. Disclosure on Green Banking Activities	GBU, CSR	June 30, 2014

*An internal deadline shall be set upon consultation with respective departments to ensure timely completion of the activities before the stipulated deadline of Bangladesh Bank