ENVIRONMENTAL AND SOCIAL MANAGEMENT SYSTEM (ESMS) SUMMARY

JULY 2026

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INTRODUCTION

Access Bank Zambia Limited ("the Bank") recognises that environmental and social (E&S) risks have the potential to give rise to credit, operational, legal, regulatory, reputational and strategic risks. Effective management of these risks is therefore an integral part of the Bank's Enterprise Risk Management Framework and supports the Bank's objective of delivering sustainable, responsible and commercially sound banking services.

The Environmental and Social Management System (ESMS) is the Bank's institutional framework for identifying, assessing, managing, monitoring and reporting environmental and social risks associated with its lending and financing activities. It operationalises the Bank's Environmental and Social Policy by establishing the governance arrangements, processes, responsibilities and controls through which environmental and social risks are managed throughout the credit lifecycle.

GOVERNANCE

The Board of Directors has ultimate oversight responsibility for the Bank's management of environmental and social risks. Oversight of the ESMS is exercised through the Board Risk Management Committee, while Management is responsible for implementing, maintaining and continuously improving the system.

Environmental and social risk management is fully integrated into the Bank's governance, risk management and internal control framework and forms part of the Bank's overall approach to prudent risk management.

GOVERNANCE

The Environmental and Social Management System (ESMS) applies to environmental and social risks arising from the Bank's business activities. It establishes the governance framework through which such risks are identified, assessed, managed, monitored and reported across the Bank.

The ESMS applies principally to the Bank's lending and financing activities, where environmental and social risk assessments are integrated throughout the credit lifecycle—from origination and due diligence to approval, documentation, monitoring and portfolio review.

In addition, the principles of the ESMS inform the management of environmental and social risks arising from the Bank's own operations, procurement activities, third-party relationships and other business activities where such risks may be material.

ENVIRONMENTAL AND SOCIAL POLICY

The Bank's Environmental and Social Policy establishes the governance principles, commitments and risk management philosophy that guide the management of environmental and social risks.

The Policy is supported by the ESMS, which translates those principles into operational processes, responsibilities and controls to ensure that environmental and social considerations are appropriately integrated into lending decisions and ongoing portfolio management.

The Bank is committed to conducting its business in a manner that promotes environmental sustainability and social responsibility. We seek to comply with applicable national laws and regulations as well as relevant international environmental and social standards adopted by the Bank.

Our Environmental and Social Policy establishes the principles that guide the identification, assessment and management of environmental and social risks across our lending portfolio.

ENVIRONMENTAL AND SOCIAL RISK ASSESSMENT

The Bank adopts a risk-based approach to the management of environmental and social risks. All applicable financing proposals are screened against the Bank's Environmental and Social Exclusion List and assessed to determine their environmental and social risk profile. Eligible transactions are categorised according to the significance of the risks identified, with the scope of due diligence, approval requirements and ongoing monitoring proportionate to the level of risk.

This approach enables the Bank to identify potential risks at an early stage and implement appropriate mitigation measures before financing is approved.

INTEGRATION INTO CREDIT DECISIONS

Environmental and social risk assessment forms an integral part of the Bank's credit approval process and is considered alongside financial, legal and other risk assessments.

Where appropriate, financing may be approved subject to specific environmental and social conditions, including the implementation of Environmental and Social Action Plans (ESAPs), contractual covenants and ongoing reporting obligations. The Bank reserves the right to decline, suspend or discontinue financing where environmental and social risks cannot be managed within its risk appetite or where borrowers fail to meet agreed environmental and social obligations.

MONITORING AND SUPERVISION

The Bank monitors the environmental and social performance of applicable borrowers throughout the duration of the lending relationship using a risk-based approach.

Monitoring activities may include periodic reporting by borrowers, review of supporting documentation, site visits where appropriate, verification of agreed corrective actions and ongoing assessment of compliance with environmental and social requirements. Material issues are escalated through the Bank's governance structures in accordance with established procedures.

REPORTING

The Bank maintains appropriate records to support the effective implementation of the ESMS and reports on environmental and social risk matters through its internal governance structures, including Senior Management and the Board Risk Management Committee.

Where required, environmental and social information is also reported to regulators, development finance partners and other stakeholders in accordance with applicable legal, regulatory and contractual obligations. Material environmental and social incidents are managed and reported in accordance with the Bank's established incident management procedures.

STAKEHOLDER ENGAGEMENT AND GRIEVANCE MECHANISM

The Bank recognises the importance of transparency, accountability and effective stakeholder engagement in the management of environmental and social risks.

Stakeholders may raise enquiries, concerns or complaints relating to the Bank's environmental and social commitments through the following channels:

- **Email: zambiainfo@accessbankplc.com**
- **Toll Free Line: 202**
- **Website: https://zambia.accessbankplc.com/**
- **LinkedIn: https://www.linkedin.com/company/access-bank-zambia-limited/**
- **Any Access Bank Zambia Branch**

All concerns received are managed through the Bank's established Complaint Management and Resolution Process to ensure that they are addressed fairly, transparently and in a timely manner.

TRANSPARENCY AND PUBLIC DISCLOSURE

To promote transparency and accountability, the Bank makes available summaries of its Environmental and Social Policy and Environmental and Social Management System through its official website and other appropriate communication channels.

CONTINUOUS IMPROVEMENT

The Bank is committed to continuously strengthening its Environmental and Social Management System to ensure that it remains effective, proportionate to the Bank's risk profile and aligned with evolving legal, regulatory and international good practice.

The ESMS is subject to periodic review to reflect changes in the Bank's operating environment, emerging environmental and social risks, lessons learned from implementation and developments in international standards. Through this process, the Bank seeks to enhance responsible lending practices, strengthen risk governance and support long-term sustainable value creation for its customers, shareholders and the communities in which it operates.