A view on Italy ESG and sustainable finance

ESG evolutions among business opportunities and supervisory expectations

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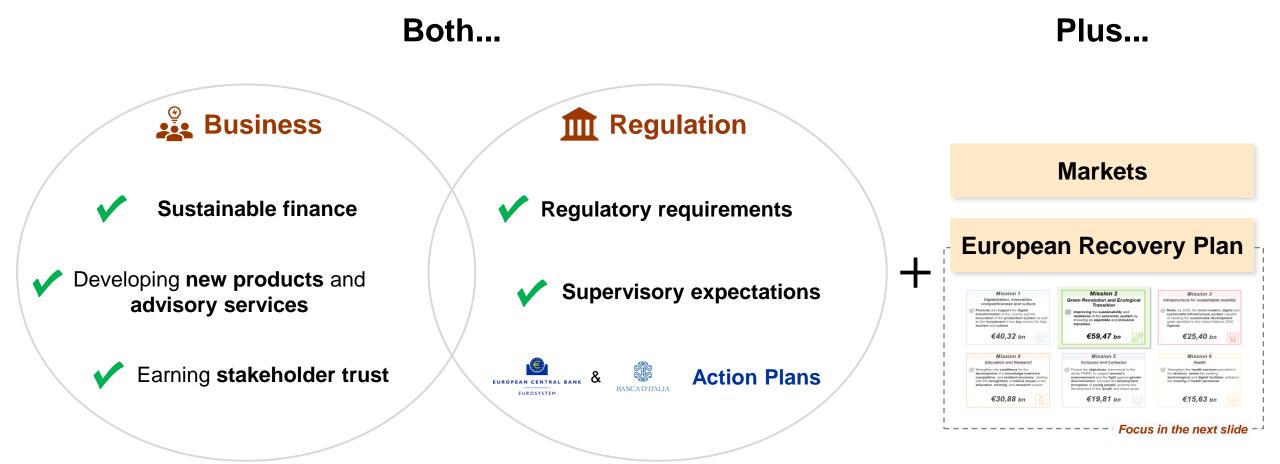








Is it about business or is it about regulation?



Sustainability is the backbone of the Italian Recovery Plan (PNRR) with over 30% of total allocated resources

Mission 1

Digitalization, innovation, competitiveness and culture

Promote and support the digital transformation of the country and the innovation of the production system as well as the investment in two key sectors for Italy: tourism and culture

€40,32 bn



Mission 2

Green Revolution and Ecological Transition

Improving the sustainability and resilience of the economic system by ensuring an equitable and inclusive transition

€59,47 bn



Mission 3

Infrastructure for sustainable mobility

Make, by 2026, the most modern, digital and sustainable infrastructure system capable of meeting the sustainable development goals identified in the United Nations 2030 Agenda

€25,40 bn



Mission 4

Education and Research

Strengthen the conditions for the development of a knowledge-intensive, competitive, and resilient economy, starting with the recognition of critical issues in the education, training, and research system

€30,88 bn



Mission 5

Inclusion and Cohesion

Pursue the **objectives**, transversal to the whole PNRR, to support **women's empowerment** and the **fight** against **gender discrimination**, increase the **employment prospects** of **young people**, promote the development of the **South** and inland areas

€19,81 bn



Mission 6

Health

Strengthen the health services provided in the territory, renew the existing technological and digital facilities, enhance the training of health personnel

€15,63 bn



Indeed, there are several areas of synergy between the Next Generation EU and the ESG framework

Environmental (E) Social (S) Governance (G) • One of the transversal objectives of Digitalization, innovation, Adoption of minimum environmental Streamlining the PA recruitment the PNRR is represented by the competitiveness and culture criteria for cultural events process reduction of the "gender gap". • To this end, the **Department of** Equal Opportunity presented on **Green Revolution and** Construction of waste management Spreading culture and awareness of August 5, 2021 to the Council of environmental issues and challenges **Ecological Transition** facilities Ministers the National Strategy for Gender Equality 2021-2026 having five macro-priorities: Infrastructure for Energy efficiency of stations and Strengthening of metropolitan rail sustainable mobility railway nodes nodes and key national connections o Work Income o Skills School building safety and upgrading University access scholarships for **Education and Research** deserving and needy students o Time plan o Power Creation of women's enterprises to Through its Missions, the PNRR **Inclusion and Cohesion** raise the levels of participation of develops the priorities women in the labor market Strategy (e.g., initiatives such as strengthening recruitment 6 mechanisms in PA and reviewing Developing the technical, Structural improvement in hospital promotion opportunities to senior Health professional, digital, and managerial building safety and security management positions) skills of the health system workforce

In a post crisis environment, this (will) lead to a segmentation of the portfolio that (will) lead financial institutions to identify the most appropriate strategy

High

Financial viability

Low

Maximization of value

- Support in adhering to Next Generation EU programs
- Customer focus and dedicated product development
- High potential in terms of profitability and credit quality (i.e. resilience)

Relaunch and enhancement

- Identification of actions needed to exploit the advantages arising from the access to support programs
- Development of dedicated products (bridge loans, capital strengthening instruments)
- · Potential upside and relaunch of the company

Adherence to development

High

development and sustainability priorities

Low

Value stabilization and preservation

- Limited possibility of access to investment programs, except in a residual way (e.g. from a supply chain perspective)
- Careful evaluation of product margins and continuity of management
- Stable profitability prospects to be preserved from risks

Supporting and minimizing losses

- Ability to access support programs (fund of funds, regional initiatives)
- Identification of going concern vs gone concern clients
- Minimization of losses related to crisis situations and stabilization of the customer base

Differentiated
strategies to
intercept all the
opportunities
related to the
Next Gen EU and
the ecological
transition

- HH = high degree of adherence to PNRR objectives and favorable financial situation
- LH = limited degree of adherence to PNRR objectives and favorable financial situation

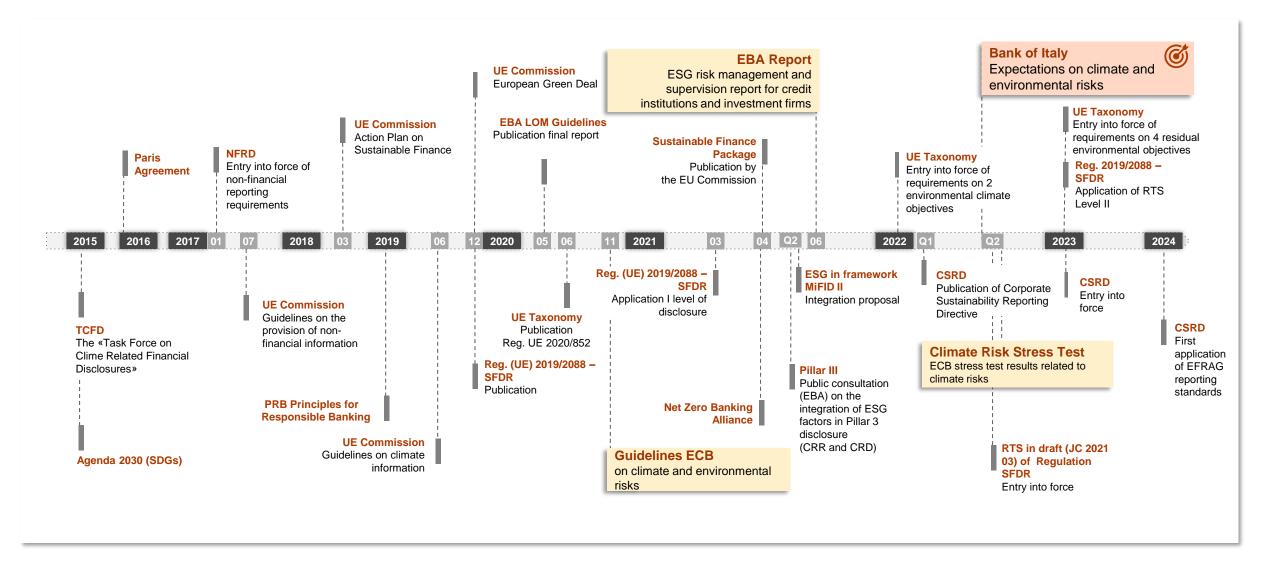
- HL
- = high degree of adherence to PNRR objectives and partially favorable financial situation
- LL

= limited degree of adherence to PNRR objectives and unfavorable financial situation

By focusing on the main areas of intervention, banks are starting to adapt their business models

	Target clients	Objectives	
DEVELOP A «CORE ESG PORTFOLIO» PROPOSITION	High «ESG Quality»	 Expansion to grow the «green core» of the future portfolio 	 Dedicated products for «ESG performing» clients finalized loans Precise identification of target clients and pricing methodology to be fine tuned
FINANCING THE TRANSITION	Potential / Perspective «ESG Quality» improvement	 Supporting clients in the transition process with dedicated finance 	Dedicated products on the market, focus on SMEs + Chances to support clients and generate lending opportunities to be fully pursued
DEVELOP «ESG DRIVEN» ADVISORY AND INVESTMENT BANKING SERVICES	All	 Transform current offering by considering ESG related factors and actions 	 ESG factors increasingly considered into Advisory and Investment Banking services + Increase product offering and cross selling through new ESG driven services

Bank of Italy has deployed its expectations consistent with the fast evolution of the international regulatory framework



The expectations are substantially aligned with ECB recommendations

	Perimeter	Implementing rules	Main objectives	Date
ECB	Significant Institutions	 Integration within their processes depending on the relevance of their exposure to environmental risks and regardless the size of the specific institution 	 Strengthening the role of ESG Governance Include climate risks within business and strategic models Integrate climate risks within organizational and operational processes Develop appropriate methodologies for measuring and monitoring climate and environmental risks Integrating ESG information to the market 	 Publication: 27.11.2020 Alignment due date: 31.12.2024
Bank of Italy	 Less significant institutions (LSI) and all other Bank of Italy supervised entities 	 To be implemented according to a principle of proportionality, to be declined according to the operational, dimensional and organizational complexity of the intermediaries and the nature of the activity carried out 		 Publication: 08.04.2022 Alignment due date: 31.12.2025 Action plan to be shared by: 31.03.2023

Although focused on environmental aspects, intermediaries may also consider the expectations with regard to the more general category of ESG risks, where relevant for their operation and taking into account the regulatory requirements of the sector

The twelve Bank of Italy expectations are attributable to five macro areas

Governance



[Expectation 1]

Business model and strategy

- culture and strategy Orientation of the process of alignment with supervisory expectations, starting from the preparation and approval of the Action Plan

Development of the role of Governance bodies in integrating climate and environmental risks into

- Identification of climate and environmental risks with potential major impacts on the business environment
- Assessment of the main impacts in the short, medium and long term to guide strategic choices and ensure the **resilience** of the **business model**

Organisation and processes

[Expectation 3]

- Implementation of the ESG strategy defined through targeted interventions on business organization and operational processes
- Policy and IT and management systems adaptation

Risk management



[Expectation 4-11]

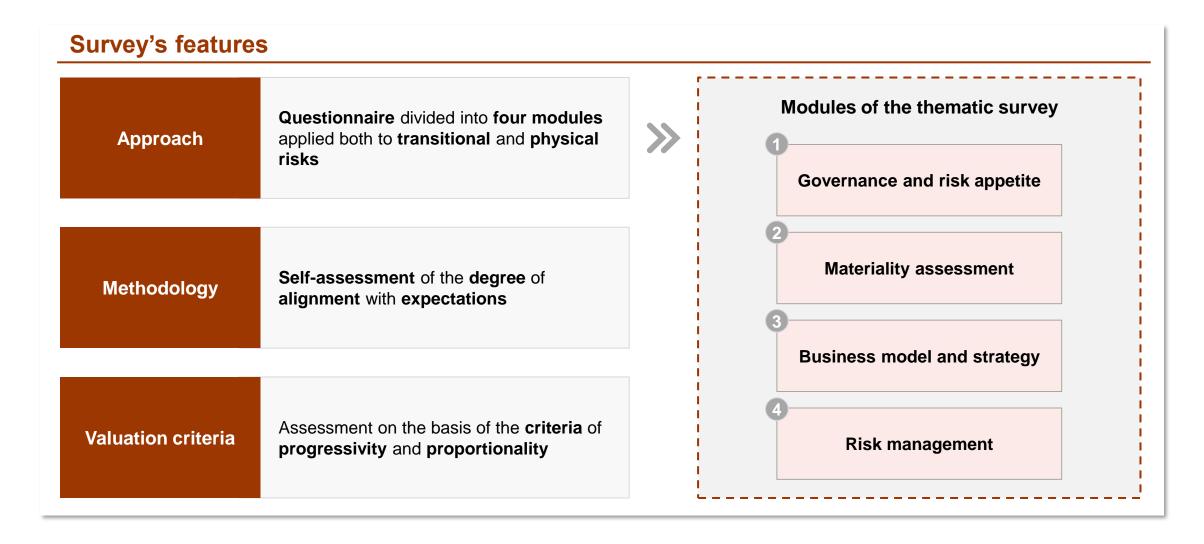
- Identification of climate and environmental risk drivers and their traceability to traditional risks
- Development of appropriate risk measurement and monitoring methodologies
- Integration of the risk monitoring database and dashboards with climate and environmental risk information

Disclosure to the market

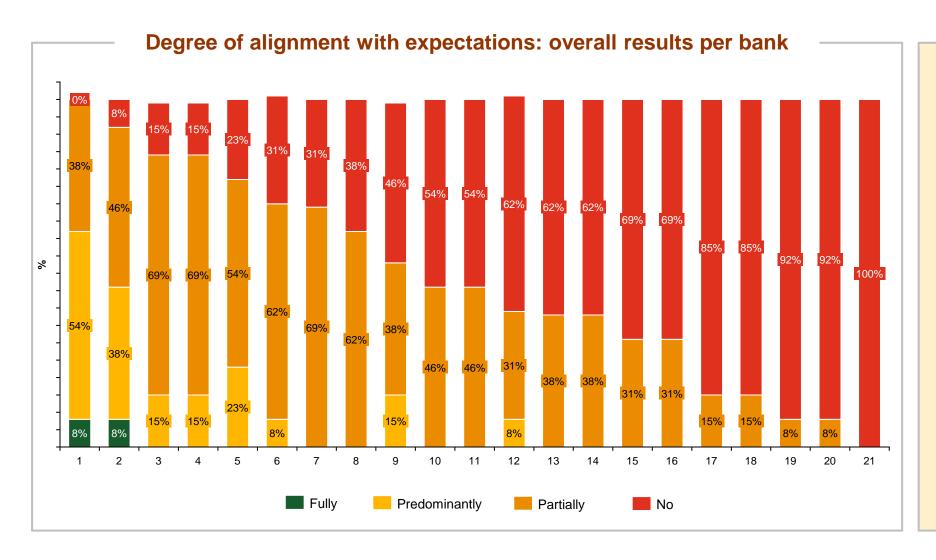
[Expectation 12]

- Preparation of the External Communication Plan on how to integrate ESG risk drivers, its assessment metrics and sustainability targets
- Adaptation of the current regulatory disclosure framework for ESG

Bank of Italy has assessed the degree of alignment with supervisory expectations of 21 LSI



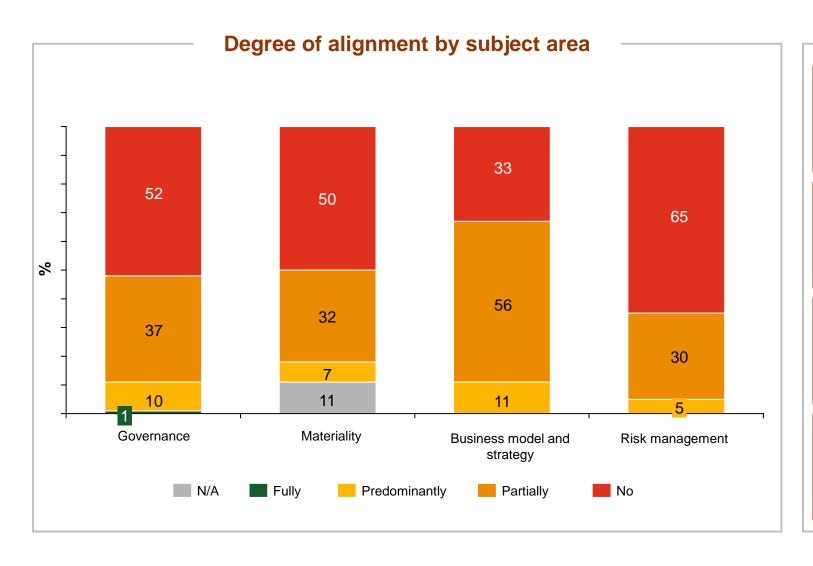
The survey shows that banks need to enhance the alignment process with the expectations



Overview

- Larger LSI have developed more organic and pervasive planning
- Smaller banks are implementing individual initiatives and are largely dependent on consortium projects
- Traditional commercial banks started later the considerations and planning activities on climate and environmental issues

The difficulty of finding robust and reliable data is the main point of attention that affects the different areas of analysis



Main findings

- A Governance and risk appetite
 Partial inclusion of climate and environmental
 issues in the agenda of the Board of almost banks
 in the sample, but with delays in specific areas
- Materiality assessment

 Materiality assessment based essentially on qualitative analysis with different levels of implementation
- C Business model and strategy
 Partial integration of environmental issues into
 strategic plan and business models through specific
 projects
- Risk management
 Strong delays in the definition of a structured process for the management of climate risks and their inclusion in the overall risk management framework

Both the expectations and the results of the survey show some points of attention for the next years



Strategy definition

 Uncertainty about the future, the changing environment in which it operates and the time horizon required within the analysis processes complicates the definition of the group strategy and jeopardizes its validity and sustainability



Business

It is important to keep up with market demand by reviewing the product offer to respond to an increasing attention by customers and investors to environmental issues



Data collection¹

The difficulty of finding robust and reliable data is the main point of attention that affects the different development areas

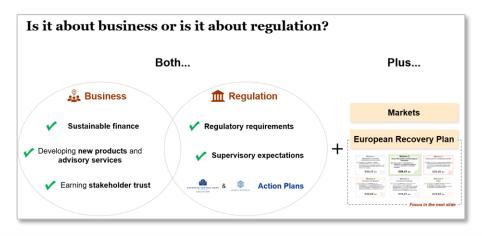




Regulatory framework

 On the one hand, the expectations published by the regulator do not yet provide clear indications on how to act operationally, on the other hand, there are no established market practices

To summarize all factors are relevant and the awareness shall increase at different levels





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