

Green Banking Policy for National Bank Limited

Green Banking Unit
National Bank Limited
Head Office
Dhaka

PREFACE

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Green Banking is an initiative of global stakeholders to save the Earth from adverse impact of environmental hazards. Kiyoto Protocol of 2003 led different financial institutions of the world to stress utmost importance to these environmental causes. Global warming, climate change, greenhouse effect, air pollution, water pollution, waste disposal, adverse weather pattern - all these contribute to environmental hazards. Green banking ensures contribution to the transition to resource efficient and low carbon industries; green industry.

Bangladesh Bank, in response to the global initiatives, made banks in Bangladesh a key segment of players to highlight the introduction, implementation of green initiatives through Green Banking.

Bangladesh Bank vide their B R P D Circular 02 dated February 27, 2011 has advised all banks in the country to lay down the foundation of green banking phase-wise within three years from 2011.

Recognizing the need of the hour, National Bank Limited is committed to play due role in the implementation of Green Banking in the bank.

Accordingly, the proposed Green Banking Policy has been prepared by the Green Banking Unit, National Bank Limited. The team of Green Banking unit has done splendid tasks in this direction. All concerned who has delivered their hands in this preparation is acknowledged.

This Policy to be read in conjunction with the Environmental Risk Management guidelines of the Bangladesh Bank, duly amended from time to time and all circulars/directives issued by the Bank from time to time.

Neaz Ahmed

Managing Director &
Chief Executive Officer

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Green Banking Policy

Green Banking policy enables an environmentally responsible bank to contribute in the economic system consisting of production, distribution business by conscious environmentally responsive finance, process, capacity building to promote pollution free environment and living standards. National Bank Limited recognizes the importance and launching different initiatives in this direction through strategic planning, operations and risk management. This Green Banking Policy lays down the fundamental components of its roll-over.

Green Banking requires a paradigmatic change in thinking about economics, business and finance. Its success would be greater if the world governors started to revise their economic paradigms from being “monetary economics” to “Ecological economics” and begin to transform their accounting principles from purely being financial into ecological / operational energy accounting patterns. Future green banking may transform in this direction.

Definition of Green Banking

Green Banking is a very general term which can cover a multitude of areas from a Bank being environmentally friendly to how their money is invested. Green Banking considers all the social and environmental / ecological factors with an aim to protect the environment and conserve natural resources. It can also be called as Ethical Banking or Sustainable Banking. Green Banking activities are controlled by the same authority but with an additional agenda towards taking care of the Earth's environment / habitats / resources.

Benefits of Green Banking

- Avoids paper works as much as possible by way of rely on electronic / on-line transaction in its Banking activities.
- Creates awareness to the business people about environmental and social responsibility enabling them to do a environment friendly business practice.
- Green Banking adopt and implement environmental standards for lending, which is really a proactive area that would enable eco-friendly business practices which would benefit our future generations.
- Interest rate against credit facilities under Green Banking products to be comparatively less than normal rate of interest as Green Banking gives more importance to environment friendly factors – ecological gains. Natural resources conservation is also one of the underlying principles in a Green Bank while assessing capital / operating loans to extracting / industrial business sector.

- Bangladesh Bank will award points to the banks on Management component while computing CAMELS rating where there will ultimately be a positive impact on overall rating of a bank.
- Bangladesh Bank will declare the names of the Top Ten Banks for their overall performance in green banking activities in the Bangladesh Bank websites.
- Bangladesh Bank will actively consider green banking activities / practices of a bank while according permission for opening new bank branch.
- As green banking morphs and starts to become a real movement, look for more countries to join the bandwagon. National Bank Limited, as one of the large scheduled commercial Bank of the country has the ability to really accelerate the green banking movement by innovating / changing it's products, philosophy and drive to sustainability. Online banking, mobile banking, etc., can empower the consumers to make informed banking decisions. These will advance the banking services to its customers. Bank in due course will adopt mobile banking, integrated online banking and sustainability and the green bank will be the leader of future banks.

Green Bank as a concept is a proactive and smart way of thinking with a vision for future sustainability of our Earth and contribute to higher and safe standard of living.

Necessity to launch Green Banking

Due to development of civilization and natural causes, the Earth's environment is being polluted in different forms which caused harms to the Earth, resulting rapid change of the Earth's climate. As a result, living beings of this planet are facing acute threat for their existence. Use of natural resources in planned or unplanned way, at the higher rate than nature's capacity to restore itself results in pollution of the environment, i. e., air, water, and land.

Scientific inventions have been making our lives easier, faster and more comfortable as these inventions provides us more connectivity, different tools & techniques to make our daily works easier. All these activities, at the same time are also polluting the environment of our planet.

The sources / causes of environmental pollution:

Following factors details the reasons for environmental hazard that requires a Green Bank to perform green supportive responsibilities.

- Population Growth.
- Globalization
- Industrialization.

Population growth is a fundamental pollution cause. With population numbers literally exploding around the world, the demand for food and other goods goes up. This demand is met by expanded production and use of natural resources, which in turn leads to higher levels of pollution.

Globalization is another major cause of pollution. Globalization has become an effective facilitator of environmental degradation. Developing countries like Bangladesh usually have much looser laws on environmental protection. With this “benefit” as well as the population growth and easy availability of cheap labor, big industry prefers to move its facilities to such “pollution havens” rather than work in more regulated systems.

Industrialization is the major cause of pollution. Among other things, industrialization set in motion the widespread use of fossil fuels (oil, gas & coal) which are now *the* main sources of pollution. Industrialization requires more natural resources for production and the pollution is released into the environment. Chemicals, metals, toxic items, rubber, plastic, waste, oil, gas, radiation, poison, noise, carbon, excess heat, smoke, etc., are the elements which pollute the environment.

Livestock farming uses vast amounts of resources and produces a lot of waste. Harmful fertilizers are widely used to grow cereals and other plants - such chemicals affect negatively the wider environment as well as human health.

Timber production is a major cause of global deforestation which releases carbon dioxide into the atmosphere.

At consumer level, a lot of pollution comes from landfill disposal of post-consumption waste which could actually be recycled. At the same time, there are many consumer goods which *cannot* be recycled - and they end up on the landfill as well. As for the wider residential sector, domestic gas heating systems and private transport are no doubt some of the major contributors to global pollution. On top of that, many residential items which can or cannot be recycled (ex., domestic furniture) are also sent to landfills. Food, clothing, other personal goods, private housing, private transport are the pollutants at consumer level.

Similar situation prevails in the commercial & social sectors. Any waste generated from the use of premises as well as transportation- all contribute to pollution levels in different ways.

National Bank Limited plays a great role in the economic development as financial intermediary, by way of keeping peoples’ money as deposit and by financing the various industries, service sectors as well as to the consumer groups. National Bank Limited has a prime responsibility to take / promote necessary initiatives towards saving our planet from pollution, thereby must act to promote green banking concept.

Green Banking Concept in Bangladesh

Bangladesh is one of the populated countries of the world and also one of the most victimized country of environment pollution. Due to the pollutants and Green House effects created by the developed countries across the globe, Bangladesh is facing severe environmental threat. On the other hand, environment pollution is taking place in the country for the following reasons:

- Rapid urbanization
- Less technological support in the industries
- Industrial wastages
- Unskilled labor
- Public / private transport
- Unconscious consumer behavior
- Unplanned development works etc

Regulatory Perspective

Considering the Bank's role as a key player of the country's economy, Bangladesh Bank, in BRPD Circular No. 02 dated 27.02.2011 advised all Banks to adopt a comprehensive Green Banking Policy in a formal and structured manner in line with the global norms so as to protect environmental degradation and ensure sustainable Banking practices.

Objectives of the Green Banking policy:

- To promote sustainable environment friendly initiatives undertaking through adoption of a set of principles and strict adherence to those principles
- To avoid financing in the industry(ies) / project(s) / business(es), which may be threat to the environment despite their financially viability
- To encourage the employees, the existing and potential clients and other stakeholders to develop, practice & promote for developing & using Environment friendly /Green Technology/products/production process
- To encourage the bank to embrace E-Commerce as a facilitator to green banking
- To develop the attitude among the employees to motivate, encourage the stakeholders through initialization of appropriate in-house environmental risk management system through introduction of appropriate technology
- To sponsor awareness programs for environment friendly products/technology through practice of Corporate Social Responsibilities (CSR)

As per the guidelines of Bangladesh Bank, National Bank Limited has to take different initiatives to introduce Green Banking in it's all Banking activities.

Implementation of Green Banking

The Green Banking Policy of National Bank Limited covers through time framework in 3 (three) phases, each phase consists of one year duration, as under:

1. Phase-I

1.1 Policy Formulation and Governance

National Bank Limited is to develop green banking policies and show general commitment on environment through in-house performance. The policy will lay down overall programs and initiatives for green banking. The Green Banking Policy has to be approved by the Board of Directors of National Bank Limited. A High Powered Committee, as per guidelines of Board of Directors will supervise green banking tasks.

As per the guidelines of Bangladesh Bank, National Bank Limited has already formed Green Banking Unit (GBU) approved by the Board of Directors. The Green Banking Unit (GBU) consists of the following members –

Designation	Position in GBU
Deputy Managing Director	Convener
Head of RMU	Head of GBU
head of CRM-I	Member
Head of Systems & Operations	Member
Head of ITD	Member
Head of Finance & CFO	Member

The Green Banking Unit has also formed a Sub Committee to formulate Green Banking Policy under the guidance of the Head of GBU. The members of the sub-committee will be selected by the CEO/ Convener of Green Banking Unit. The Green Banking Unit will be responsible for the design, evaluation and administration of all issues relevant to green banking in the bank. they will comply with regulatory requirement under the guidance of the Board of Directors of the Bank.

The members of the Sub Committee will be responsible for coordinating Green Banking tasks and activities of the Bank.

The Audit Committee of the Board of Directors is to act as the High Powered Committee of National Bank Limited to review all tasks of green banking of National Bank Limited.

1.2 Incorporation of Environmental Risk in CRM

National Bank Limited shall comply with the instructions stipulated in the detailed guidelines on Environmental Risk Management (ERM) in consideration of a part of the Green Banking Policy. As per the guidelines of Environmental Risk Management (ERM) of Bangladesh Bank, issued in January, 2011, National Bank Limited has already issued a policy guidelines Circular No. 3106 dated 07.08.2011 on Environmental Risk Management (ERM) with a view to incorporate Environmental and Climate Change Risk as part of the existing credit risk methodology prescribed to assess borrowers. This includes integrating environmental risks in the checklists, audit guidelines and reporting formats. These inclusion will support mainstream Environmental Risk that cover possible sources of Environmental Risk such as land use, climate change related events (cyclone, drought), animal diseases/pathogens such as avian influenza, solid waste including waste feed, animal waste, carcasses, sediments, wastewater discharges, hazardous materials, etc to be reviewed under Environmental Due Diligence (EDD) checklists. This circular of National Bank Limited details the environmental risk management process for different finance segment in line with guidelines of Bangladesh Bank.

1.3 Initiating In-house Environment Management

National Bank Limited shall also formulate a 'Green Office Guide' or a set of general instructions for it's employees for efficient use of utility services and other resources to ensure energy savings and less wastage creation. To this effect, National Bank will initiate the following activities:

- Inventory of utility consumption
- Online communication instead of relying on printed documents
- Application of Ecofont in printing to reduce use of ink
- Use scrap paper as notepads
- Avoid disposable cups / glasses
- Installation of energy efficient electronic equipments
- Automatic shutdown of computers, fans, lights, air coolers etc
- Use of solar energy may be considered to save electricity
- Periodic reports/MIS on above to be prepared suitably for senior management and regulatory reporting to ensure higher scale of in-house Environment Management.

1.4 Introducing Green finance

National Bank Limited, as a driver of green banking supports all initiatives for eco friendly business activities and energy efficient industries will be given preference in financing. The Bank to support environmentally friendly infrastructure will encourage the following projects while financing:

- Renewable energy project
- Clean water supply project
- Wastewater treatment plant
- Solid & hazardous waste disposal plant
- Bio-gas plant
- Bio-fertilizer plant
- Brick manufacturing projects having HHK
- Environmental friendly consumer loans etc.

While financing any project, following issues to be considered:

- Compliance of the rules & regulations of the Department of Environment (DOE)
- Presence of treatment plant (if required)
- Nature of wastages, its volume and effect on the environment
- Bi products from the wastages
- Re cycling of wastage
- Use of natural resources etc.

1.5 Creation of Climate Risk Fund

Bank will consider financing the economic and commercial activities of the flood, cyclone and drought prone areas at the regular interest rate without charging additional risk premium associated with environmental risk. National Bank Limited will assess the environmental risks for financing the sectors in different areas in order to create a Climate Risk Fund. This fund will be used in case of emergency. The bank would ensure regular financing flows in these vulnerable areas and sectors. The fund could be created as part of banks' CSR expenses. Bank's commitment for corporate social responsibilities could include this funding.

1.6 Introducing Green Marketing

Green marketing is the marketing of products/services that are environmentally focused. Green marketing incorporates a broad range of activities, including product modification, changes to the production process, packaging changes, as well as modifying advertising to promote green banking. It is the process of selling products and/or services based on their environmental advantages. Such a product or service may be environmentally friendly in itself or produced and/or packaged in an environmentally friendly way or support environmental causes. Bank thus uses environmental causes for marketing their services to consumer. Green marketing is expected to create awareness for environmental safety development among mass people.

Green banking products that are supportive by National Bank Limited are as under.

- Bio Gas project: NBL Bio Gas Loan is a loan which facilitates setting up of Bio Gas plant for family/commercial use. Under this facility the areas will get priorities which are not surrounded by gas networking. The facility may be extended under refinance of Bangladesh Bank. The purpose of the loan is to setup Bio-gas plant in rural and urban area where gas networking is not available and producing Bio-gas for meeting household requirement and commercial use.
- ETP financing: Industrial wastewater treatment covers the mechanisms and processes used to treat waters that have been contaminated in some way by anthropogenic industrial or commercial activities prior to its release into the environment or its re-use. The purpose of ETP financing is to establish Effluent Treatment Plant to save environment through reduction of waste.
- Solar Panel: NBL Solar Energy loan is a loan which facilitates the financial needs to purchase Solar Panel with a view to spread out the consumption of Solar Energy in urban and rural areas for house hold or business use.

The Bank will continue to emphasize on introducing more Green products which will be eco friendly and socially acceptable.

More deposit and loan products will be introduced through online banking for the targeted customers. Attractive rates may be offered for these products. Green Banks products may also have lower fees and give rate reductions on loans going towards energy-efficient projects. Bank's customers you will see our sustainability principles demonstrated in our buildings, operations and lending principles. This is banking through social benefit.

Another important aspect of green banking is the involvement and outreach from National Bank Limited to the local community. The bank can make a real difference by making commitments to local environment projects. National Bank Limited will emphasize on promoting the local community towards undertaking of different eco-friendly projects which will largely be profitable for the community.

Mobile Banking and Mobile Payments

Mobile banking provides a solution to the problem of bringing financial services to the rural poor. Bangladesh has a great opportunity to put resources into developing mobile infrastructure than improving landlines. The environmental benefit of a push towards more mobile banking is enormous, but there is also a societal benefit. This initiative will enable millions of Bangladeshis to use their mobile phones to bank in areas where there are no branch offices. The unbanked or under banked living in rural areas will have the ability to tap into many of the same resources as people living in metropolitan areas. Even more important, mobile banking may assist in

poverty alleviation. It may be used for bank's transaction, inquiry and information tracking.

By use of mobile to check bank account balances and transfer money, a whole new revolution started in the payments world. We may capture the attention of the public and investors as more innovative payments solutions are introduced in the market.

The mobile phones may replace the wallet or purse that is stuffed with credit and debit cards. Encryption and security actually make it a safe payment alternative.

Mobile payments are also green solutions that help the environment, we save natural resources. National Bank Limited may take initiatives for introduction of mobile banking.

1.7 Online Banking

Online banking is the practice of making bank transactions or paying bills via the Internet on a secure website of the respective bank that allows the customers to make deposits, withdrawals and pay bills. National Bank Limited emphasizes to make the easiest way to help environment by eliminating paper waste, saving gas and carbon emission, reducing printing costs and postage expenses. National Bank Limited has already started anywhere banking. Installation of new banking software is under process which will pave the way for larger scale of online banking facilities.

1.8 Supporting Employee Training, Consumer Awareness and Green Event

National Bank Limited emphasizes the importance of employee awareness development and training on environmental and social risk and the relevant issues on a continuous process. Awareness development among consumers and clients would be a continuous task of the bank.

National Bank Limited will organize trainings / workshops / awareness programs on Green Banking and Environmental Risk Management for its employees at different levels. In the future, our clients' will also be invited for knowledge sharing. These programs are being taken as a continuous process to develop the employees as well as the customers and other stakeholders of the Bank to take part whole heartedly towards implementation of Green Banking.

1.9 Disclosure and Reporting of Green Banking Activities

National Bank Limited shall report on the initiatives / practices on green banking activities periodically to Bangladesh Bank then to be disclosed in bank's websites on regular basis.

2. Phase-II

The time lining for the actions to be taken under Phase-II should not exceed December 31, 2012.

2.1 Sector Specific Environmental Policies

Banks will formulate strategies to design specific policies for different sectors sensitive to environment risks. National Bank Limited will formulate policies for the following environmental sensitive sectors on priority wise:

- Agri-Poultry
- Agri-Dairy
- Cement
- Chemicals-Fertilizers
- Chemicals-Pesticides
- Chemicals-Pharmaceuticals
- Engg. and basic metal
- Housing
- Pulp & paper
- Sugar & distilleries
- Tannery
- Textile and apparels
- Ship breaking

The bank will formulate any other sector specific policy as and when these are required, to be duly approved by the competent authority of the bank.

2.2 Green Strategic Planning

National Bank Limited shall determine green targets to be attained through strategic planning. Bank shall determine a set of achievable targets and strategies, and disclose these in the annual reports and websites for green financing and in-house environment management as well. For in-house environment management, the target areas shall cover attaining energy efficiency in the form of the use of renewable energy, reduction of electricity, gas, and petrol consumption, reduction of Green House Gas(GHG) emissions, issuance of e-statements, mobile banking, online banking, e-banking, electronic bill pay, saving papers, environment friendly office buildings etc. Green Financing aims to reduce loans for certain environmentally harmful activities and it shall attain, a particular percentage of environmental loans as percentage of total with emphasis for introduction of eco-friendly financial products/services etc.

2.3 Setting up Green Branches

Prominently, Green Branch is characterized by the provision of the maximum available of natural light, use of renewable energy, use of energy saving bulbs and other equipments, reduced water and electricity use, use of recycled water etc. Branch, as such, shall be categorized as a 'Green Branch'. A Green Branch will be entitled to display a special logo approved by Bangladesh Bank. The features of green branch is indicated under Annexure –A

2.4 Improved In-house Environment Management

Strategy of reuse, recycling of materials and equipments, and source reduction and waste minimization strategy should be part of ongoing in-house environmental management in Phase-II. Bank shall concentrate to rely on improved In-house Environment Management to save cost and energy. Virtual meeting, video conferencing, reducing travel, e-mail networking, web based communication, use of electronic data transfer should be gradually introduced.

2.5 Formulation of Bank Specific Environmental Risk Management Plan and Guidelines

According to the guideline, every bank should develop and follow an environmental risk management policy and procedures guidelines in their assessment and monitoring of project/term and working capital finance. Apart from compliance of National regulation, the bank may adopt internationally accepted higher environmental standards. Collective efforts of banks in this direction will be an advantage. National Bank Limited may enter into strategic alliance with other banks/institutions to promote green banking products and initiatives.

2.6 Rigorous Programs to Educate Clients

Under this initiative, National Bank Limited will integrate clients and business concerns to make later aware of environmental impediments and social responsibilities to comply with the environmental regulations and to undertake resource efficient and environmental activities. National Bank Limited will introduce rigorous programs to educate its clients through workshops, seminars, client / project visit/road show etc.

2.7 Disclosure and Reporting of Green Banking Activities

In continuations to phase I, National Bank Limited will upgrade disclosure capability and will start publishing independent Green Banking and Sustainability reports showing past performances, current activities, and future initiatives. Updated and detailed information about banks environmental initiatives, achievements and performances of major clients should be disclosed.

3. Phase-III:

Total timeline for implementation of phase III consists of 12 months. It is pre requisite that a solid green banking foundation has been laid down and a system of Environmental Management is in place in the bank before the initiation of the activities of Phase-III. National Bank Limited will address the whole eco-system through environment friendly initiatives and introducing innovative products. Standard environmental reporting with external verification will be a part of this phase.

3.1 Designing and Introducing Innovative Products

National Bank Limited is expected to introduce environment friendly innovative green products to address the core environmental challenges of the country, side by side phase out of negative influence of environmental hazards on banking activities and operations.

3.2 Reporting in Standard Format with External Verification

National Bank Limited will require to publish independent Green Annual Report in line with internationally accepted format like Global Reporting Initiatives (GRI) targeting the bank's stakeholders. An arrangement to be made for verification of these publications by an independent agency or acceptable third party. This will highlight bank's commitment for green banking goals and their standardized achievement.

Reporting Green Banking Practices

As per Bangladesh Bank's guideline, National Bank Limited reports the Bank's initiatives / activities under the green banking initiatives to the competent authority of Bangladesh Bank on regular basis as may be required from time to time.

National Bank Limited shall update their annual report and websites with the disclosures on green banking initiative / activities.

Considering the importance of the issue, all concerned employees of National Bank Limited must put their sincere efforts to make National Bank Limited as compliant Bank

The activities and tasks of Green Banking Unit will periodically be placed to the senior management and to the supreme policy and strategic level of authority of the bank –Board of Directors / Audit Committee of the Board of Directors of the bank. National Bank Limited shall strive proactively to attain best level of achievement in green banking implementation, in order to be recognized as market leader in the competitiveness.

Annexure - A

Indicators of Green Branches

The following areas should be considered when building a green branch.

Branch Location:

- Green Surroundings such as trees & eco friendly garden: The branch should be surrounded by green trees and gardens.

Exterior design:

The exterior and interior design of the branch should fulfill the following criteria.

- Sufficient glass to facilitate the maximum use of natural light.
- Sufficient air ventilation: The building should be designed to obtain maximum benefits from natural air. That's why air ventilation system must be efficient.

Operation Process:

The bank's operation process should consist of following elements.

- Automation and paperless banking: Paperless banking is getting online access through banks' website. Customers can pay bills, and make account transfers online and get accounts statements and credit card statement through e mail.

Branch layout:

- The office furniture: The office furniture should be made through environmentally friendly materials.
- More space of employees: The fixtures of the branches should be like that the employees will get more space.
- Proper office file maintenance: There should be a well-organized system for office file maintenance. The efficient system will facilitate clean environment inside the office.

Conversant people/employees:

The employees of that branch must be computer literate and have sufficient knowledge on information technology. The employees must also have knowledge on the requirement of green banking and green office.

Green Products:

The bank can introduce some products which facilitate the prevention of environmental losses. The bank will drive its extensive marketing through its green branches. Particularly, the green branches will deal with these sorts of products. Green finance i.e environmental friendly finance will be routed through this branch.

Code of conduct for green branch:

Green Branches should have a green office guide which ensures the regulatory compliance. The green office guide includes energy conservation policy, paper

reduction policy, and sustainable practices. The green office guide also states how the branches will ensure the compliance.

Energy sources:

Alternative energy resources should be introduced. Solar energy must be used to save environment. There should be a clear and specific plan to use the solar power. When deciding solar as an energy sources, at first the authority needs to estimate the total need of energy to run branch and then decide on setting up solar panel.

Energy consumption:

The energy efficient lights must be used. Use of printers must be limited when load shedding. Ensure the use of shared copy machines and printers and are put in standby mode when not in use or turned off at the end of each day. Mandate the use of screen savers for computers.

Sustainable practices:

Two sided printing must be ensured in the office.

Arrangement of green events and knowledge sharing program:

Branches could arrange green events highlighting the green products and bank's green practices. The bank needs to create opportunities and systems to promote knowledge sharing and organizational learning. Invite people from other banks who already adopted green practices in office. Encourage employees to volunteer in their local communities or to support other community projects.

To establish a green branch, above mentioned indicators can be decisive factors which may be required from time to time.