

Sustainability Policy

February 2026

1.	SUMMARY	The Sustainability Policy sets out the commitment of MCB Group Limited to integrating Environmental, Social and Governance principles into its strategy, operations and across the value chain.			
2.	OWNER	Central Sustainability Office Sustainability, Reputation and Engagement SBU			
3.	ALTERNATE OWNER	Not Applicable			
4.	AVAILABLE ON	Intranet	✓	Website	✓
5.	DISSEMINATED TO	All business lines and publicly available on MCB Group Limited website			
6.	REVIEWED BY	Group Head of Sustainability, Reputation and Engagement			
7.	VALIDATED BY	<ul style="list-style-type: none"> • Corporate Governance and Sustainability Committee • Board MCB Group Ltd 			
8.	DATE OF VALIDATION	<ul style="list-style-type: none"> • Corporate Governance and Sustainability Committee: 7th November 2025 • Board MCB Group Ltd: 13th February 2026 			
9.	DATE OF NEXT FORMAL REVIEW	February 2028			

Table of Contents

1. Introduction	3
2. Purpose	3
3. Scope and Application	4
4. Definitions.....	4
5. Governance and Oversight	5
6. Success Beyond Numbers.....	6
7. Sustainability Focus Areas	6
8. Responsible behaviour.....	10
9. Our ESG Materiality Approach.....	10
10. Cross-referencing.....	11
11. Responsibilities of the Relevant Parties.....	12
12. Monitoring	12
13. Review and approval of policy.....	14
14. Revision History	15

1. Introduction

At MCB Group Limited (hereinafter referred to as “MCB Group” or the “Group” or “MCB” interchangeably), we believe that good governance and responsible business practices are fundamental to fostering long-term sustainability, creating value for our stakeholders, and acting in the best interests of the society. As the leading financial institution in Mauritius and a growing player in the region, we recognise the important role we play in contributing to shaping resilient economies, supporting communities, protecting the environment and driving inclusive growth. Our sustainability journey is anchored in our purpose, **Success Beyond Numbers (SBN)**. In line with its Strategic intent, Vision 2030, MCB strives to use finance as a force for good in creating a sustainable and inclusive future for the customers and communities we serve.

This Sustainability Policy sets the framework for embedding sustainability in our strategy, risk management, lending, investment, procurement and operational practices, and stakeholder engagement. It reflects our conviction that responsible banking practices and sustainable finance are key enablers of inclusive economic growth, climate resilience, and community well-being.

This Policy reflects our alignment with internationally recognised standards and frameworks, including the UN Sustainable Development Goals (SDGs), the UN Global Compact (UNGC), the Equator Principles, and the UNEP FI Principles for Responsible Banking.

MCB acknowledges the distinct challenges and opportunities in the regional sustainability landscape and reaffirms its commitment to supporting a just transition toward a low-carbon, nature-positive, and inclusive economy.

2. Purpose

This Sustainability Policy (“Policy”) articulates MCB Group’s commitment and approach to integrating Environmental, Social, and Governance (ESG) principles across our business model. It guides our decision-making, risk management, and stakeholder engagement, ensuring that sustainability is embedded in the way we finance, operate, and grow. It ensures accountability, transparency, and alignment with our purpose and Vision 2030. It also demonstrates our commitment to international best practices and regulatory requirements in the jurisdictions where we operate.

3. Scope and Application

This Policy applies to all subsidiaries under MCB Group across all geographies of operation. It is applicable to all permanent and temporary employees, contractors, consultants, and any individuals acting on behalf of the Group. The policy also outlines our interactions with external stakeholders, including clients, suppliers, and partners, ensuring sustainability considerations are embedded across the value chain.

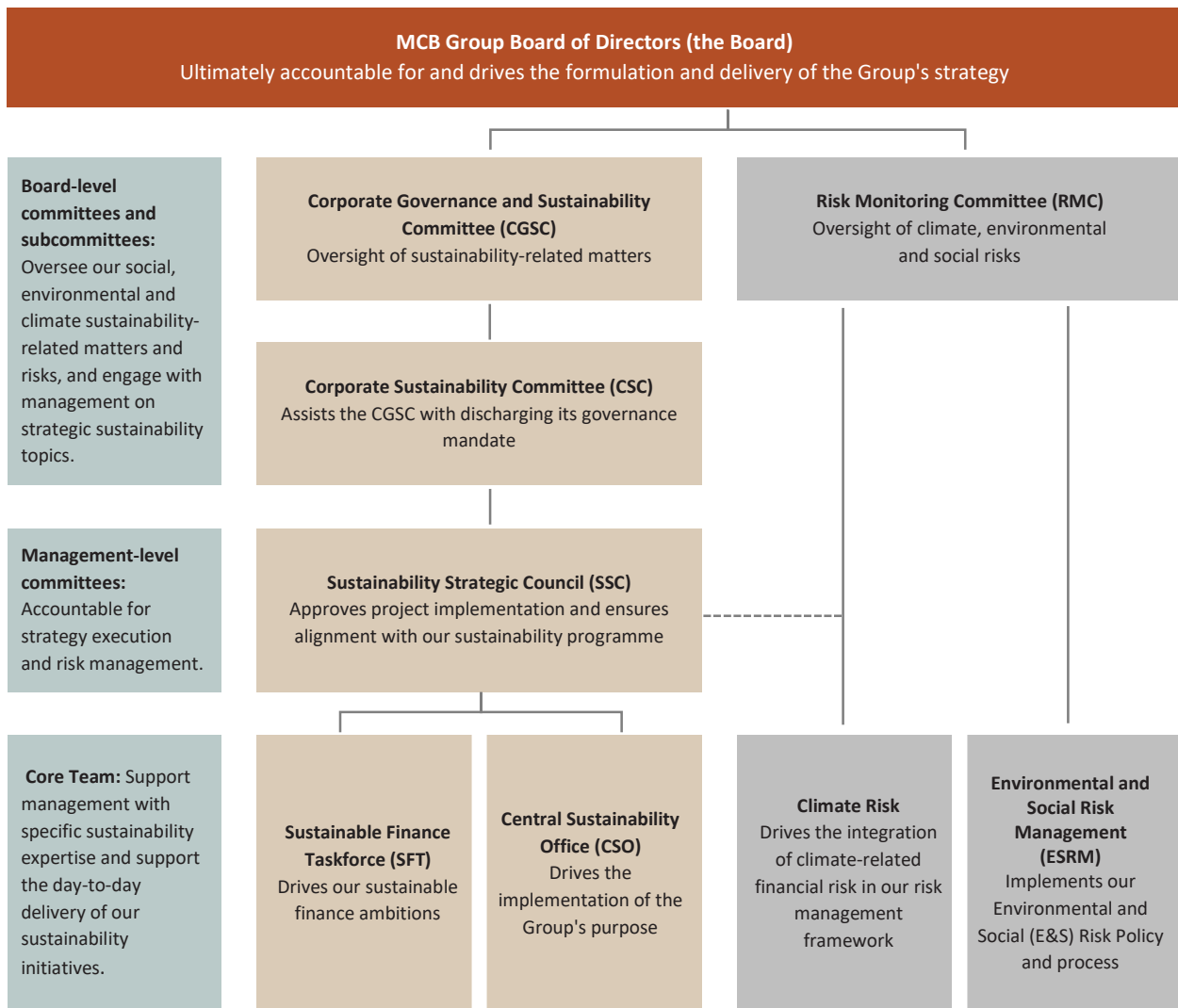
4. Definitions

Acronym	Meaning
CIB	Corporate Investment Banking
CGSC	Corporate Governance and Sustainability Committee
CSC	Corporate Sustainability Committee
CSO	Central Sustainability Office
DEI	Diversity, Equity and Inclusion
ESG	Environmental, Social and Governance
ESRM	Environmental and Social Risk Management
MCBFF	Mauritius Commercial Bank Forward Foundation
MMEs	Mid-Market Entreprises
RMC	Risk Monitoring Committee
SBN	Success Beyond Numbers
SDGs	Sustainable Development Goals
SFT	Sustainable Finance Taskforce
SMEs	Small Medium Enterprises
SSC	Sustainability Strategic Council
UNEP FI	United Nations Environment Programme Finance Initiative

5. Governance and Oversight

MCB has a robust and clearly defined sustainability governance structure, comprising the Board and management committees that are responsible for overseeing our sustainability programme and guiding decision-making related to climate, environmental and social risks.

The diagram below depicts an overview of our sustainability governance structure:



Key: Oversight of sustainability-related matters Oversight of climate, environmental and social risk

6. Success Beyond Numbers

In November 2018, the MCB launched **Success Beyond Numbers** to bring sustainable value to the country and its inhabitants, to rethink the notion of success beyond a sole financial assessment, and to be a legacy to future generations. SBN was elevated to our Group's purpose in 2021.

Our purpose acts as our guiding compass and underpins our commitment to embed sustainability into everything we do and shape every action into an opportunity for success. To deliver on our purpose and support the execution of the Group's strategy and Vision 2030, we established our sustainability programme that comprises three focus areas:

Focus Area 1



Vibrant and sustainable local
and regional economies

Focus Area 2



Our cultural and
environmental heritage

Focus Area 3



Individual and collective
well-being

7. Sustainability Focus Areas

7.1. Focus Area 1: Vibrant and sustainable local and regional economies

a) Responsible Product Development

We aspire to develop financial products and services that embed sustainability principles and address the evolving needs of our customers and markets. By collaborating with stakeholders through products, services, events, and thought leadership, we create platforms that encourage dialogue, innovation, and the adoption of sustainable practices across sectors. Our product development approach also supports the transition to a sustainable local economy. Within our sustainable finance framework, we co-create solutions and improve our offerings that empower local businesses and align with the Sustainable Development Goals. Through our financial offerings we aim to actively contribute to a resilient, inclusive, and low-carbon economy.

b) Responsible Finance that Promotes Financial Inclusion and Environmental Sustainability

We are dedicated to advancing financial literacy and inclusion by embedding educational initiatives into our customer engagement efforts, empowering individuals with the knowledge and tools to navigate financial systems safely and confidently. We aim to nurture entrepreneurship by providing tailored support to Small Medium Enterprises (SMEs) and Mid-Market Enterprises (MMEs) with a particular focus on inclusive growth, peer learning and access to microfinance, ensuring that emerging businesses can thrive sustainably. We continue to promote and enhance digital banking solutions to ensure broad, equitable access to financial services by contributing to a more inclusive, efficient and cashless economy. In alignment with our commitment to environmental sustainability, we leverage the MCB Sustainable Framework to guide the allocation of financial resources towards green, social and sustainability-linked initiatives. This approach enables us to drive meaningful environmental progress while fostering long-term value creation for our stakeholders.

c) Serving Our Customers

We aim to deliver responsible, transparent, and innovative banking solutions that meet their diverse needs while fostering long-term trust and value. Beyond financial services, we support financial capability building and provide advisory services that empower customers to make informed choices and embrace opportunities in a rapidly changing socio-economic landscape.

d) Promoting Responsible Procurement

We recognise the influence of our procurement practices in promoting sustainability across our value chain. By strengthening responsible procurement standards, we encourage suppliers and partners to adopt ESG aligned practices. In doing so, we extend our positive impact beyond our direct operations and contribute to the resilience and sustainability of local and regional economies.

7.2. Focus Area 2: Preservation of our environmental and cultural heritage

a) Managing Our Direct and Indirect Operational Environmental Impacts

We are committed to managing our direct and indirect environmental impacts through responsible consumption, procurement, and waste management. We are committed to reducing our energy consumption, promoting conservation of water and improving resource efficiency across our operations with a focus on responsible internal practices.

b) Impact Partnerships: Our Key Environmental and Cultural Impact Partnerships

We aim to contribute to biodiversity conservation through our impact partnerships across the region. We support community-based initiatives aligned with environmental conservation to protect our local biodiversity for future generations. We remain committed to protecting sensitive environments and communities by applying our Exclusion List, which restricts business activities in areas that may pose significant environmental or social harm. We aim to spread awareness on climate change topics by encouraging dialogue across the Bank and in the community. By using strategic communication and advocacy, we create an environment where individuals understand their impact and contribute to a sustainable future.

c) Arts and Culture

We are committed to preserving the rich cultural heritage through various initiatives that nurture local creative expression and preserving historical legacy. Moreover, our approach is rooted in collaboration to promote the protection of environmental and cultural assets in the regions where we operate.

7.3. Focus Area 3: Individual and collective well-being.

a) Empowering our Employees

We are committed to fostering a workplace culture that prioritises the health, safety, and overall well-being of our employees. Through our MCB Career Architecture and Employee Value Proposition, we provide a clear framework for growth, recognition, and engagement, ensuring that our people feel valued and supported throughout their professional journey. Our structured talent management framework enables us to identify, nurture, and retain high-potential individuals, while our performance management approach ensures alignment with strategic objectives through regular feedback, goal setting, and recognition. Together, these initiatives create a resilient, future-ready workforce that thrives in a respectful, inclusive, and high-performing environment.

b) Culture and Diversity, Equity and Inclusion (DEI)

We are committed to fostering a culture of diversity, equity, and inclusion. Through initiatives such as the Gender Equality Charter, DEI Charter and Equal Opportunity Policy, we promote an inclusive environment where all individuals are respected, empowered, and able to contribute fully to the success of the Group.

c) Supporting Our Communities

We contribute to positive social impact through education, sports, skills development, and other social initiatives via the MCB Forward Foundation (MCBFF) and other partnerships. By empowering communities and fostering learning, we create lasting social value and support future generations. Our commitment to community engagement also includes supporting broader initiatives to improve quality of life in the regions where we operate.

8. Responsible behaviour

The three sustainability focus areas are supported by our commitment to responsible behaviour and ethical business practices.

These include:

- Business ethics, integrity and transparency
- Prevention of Bribery, Corruption, Fraud, Money Laundering, Terrorist Financing and Proliferation Financing
- Customer privacy, data protection and information security
- Whistleblowing mechanisms and protection of whistleblowers
- Tax responsibility
- Respect for and protection of human rights
- Fair, equitable and responsible remuneration practices.

9. Our ESG Materiality Approach

MCB recognises the rapid evolution of sustainability-related risks and opportunities, alongside increasingly complex disclosure requirements. MCB adopts a double materiality approach, considering both its impacts on people and the environment (impact materiality) and the sustainability-related risks and opportunities that could reasonably be expected to affect MCB's prospects in the short, medium, and long term (financial materiality). The material sustainability topics are defined using the Global Reporting Initiatives (GRI) standards (GRI 3: Material Topics 2021). Our approach is guided by and aligned with internationally recognised standards such as the GRI Standards and the IFRS Sustainability Standards.

The materiality analysis for MCB Ltd is subject to periodic review and update to ensure MCB's material topics remain valid and are aligned to evolving sustainability trends and the Company's strategic orientations. This exercise shall be under the mandate of the CSO.

10. Cross-referencing

This Policy should be read in conjunction with other Group policies, procedures, frameworks and local regulations including but not limited to:

A. Governance, Ethics, and Compliance

[Code of Ethics and Business Conduct](#)

[Conflicts of Interest and Related Party Transactions Policy](#)

[Anti-Bribery & Corruption Policy](#)

[Whistleblowing Policy](#)

[Disciplinary Policy](#)

[Mauritius Bankers Association's Code of Ethics and Banking Practice \(2016\)](#)

[National Code of Corporate Governance for Mauritius \(2016\)](#)

[Bank of Mauritius Guideline on Climate-related and Environmental Financial Risk Management](#)

[Materiality Assessment](#)

Applicable local regulations and international reporting requirements

B. Risk Management and Sustainability

[Risk Management Framework](#)

[Environmental and Social Risk Management Policy \(ESRM\)](#)

[Business Continuity Policy](#)

[MCB Sustainable Finance Framework](#)

[Climate-related Financial Risk Disclosures](#)

C. Diversity, Equity, and Inclusion (DEI)

[Equal-Opportunity-Policy](#)

[Gender Equality Charter](#)

DEI Charter

[Workplace-Violence---Policy-and-Procedure](#)

[Grievance Policy](#)

[Social Leave Policy](#)

D. Information Security and Operational Integrity

[Information Security Policy](#)

[Cyber and Technology Risk Governance Policy](#)

[Data Privacy Policy](#)

[Personal Data Retention Policy](#)

11. Responsibilities of the Relevant Parties

a) Group Chief Executive

Holds ultimate accountability for the Group's sustainability agenda, ensuring alignment with long-term strategic objectives.

b) Group Head of Sustainability, Reputation and Engagement

Leads the development, alignment, and monitoring of the Policy and associated strategies, working to embed sustainability into the Group's culture and operations.

c) Group Sustainability Manager

Leads the execution of the sustainability policy and strategy, implements related initiatives and tracks relevant associated metrics.

12. Monitoring

a) The **Corporate Governance and Sustainability Committee (CGSC)** has ultimate governance oversight of our Sustainability programme and assists the Board with discharging its duty to **monitor** the progress of our sustainability engagement.

b) The **Risk Monitoring Committee (RMC)** reviews and recommends the risk appetite to the Board, assists in setting up risk strategies and assesses and monitors the Group's risk management process. It also advises the Board on risk issues, including maintaining ultimate governance oversight of environmental and social risks, and **monitors** the risk of different portfolios against the set risk appetite.

c) The **Corporate Sustainability Committee (CSC)** is a sub-committee of the CGSC, providing enhanced governance and oversight of our sustainability programme. Its responsibilities include **monitoring** our progress and ensuring that we implement appropriate sustainable development initiatives, as well as integrate relevant environmental and social considerations into our decision-making processes.

The CSC reports its findings and recommendations to the CGSC after every scheduled meeting or at ad hoc committee meetings as needed.

- d) The **Sustainability Strategic Council (SSC)** is responsible for implementing and driving accountability for our Board-approved sustainability programme throughout the Group. It ensures that proposed initiatives are aligned with the objectives of our sustainability programme, and address our key economic, social and environmental sustainability matters. The SSC also oversees the action plans, approves and **monitors** the budgets required to support the implementation of projects. The SSC comprises our Chief Executives (Bank and Group), our Chief Finance Officer, cross-functional Head of SBUs and the Group Sustainability Manager.
- e) The **Sustainable Finance Taskforce (SFT)** oversees the overall Group's Sustainable Finance strategy, developments and performance. Some of the key areas of action include harmonising the implementation of the sustainable finance framework across all subsidiaries (where applicable), sustainable finance data and disclosures, to mainstream sustainable finance locally and countries where we operate in. The SFT shall be held every quarter and will report to the **Sustainability Strategic Council**, which in turn reports to the **Corporate Sustainability Committee**.
- f) The **Central Sustainability Office (CSO)** is responsible for developing and driving the implementation of the Group's Sustainability Programme across three key workstreams, namely: ESG and Climate, Initiatives and Impact, and Reporting and Disclosure. The CSO reports to the Head of Sustainability, Reputation and Engagement, who in turn reports to our Group Chief Executive. CSO **monitors** and reports on the progress on our Sustainability programme annually through Sustainability disclosures in our Sustainability report.

13. Review and approval of policy

This Sustainability Policy has been approved by the Corporate Governance Sustainability Committee. The Sustainability Policy will be reviewed every two years, or more frequently if required due to material changes in regulations, stakeholder expectations, or strategic priorities. The review will be coordinated by the Central Sustainability Office (CSO). Any updates will be submitted to CSO for endorsement and subsequent approval by the Sustainability Strategic Council (SSC) and the Corporate Sustainability Committee (CSC), as appropriate.

14. Revision History

Date	Version	Action	Amendments	Reviewed/Approved by	Approved Date
November 2025	1.0	New Policy	N/A	<ul style="list-style-type: none">Corporate Governance and Sustainability CommitteeBoard MCB Group Ltd	7 th November 2025 13 th February 2026