ShareAction»

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Sergio Ermotti
UBS
Bahnhofstrasse 45
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10 December 2024

Dear Mr. Ermotti,

I am writing to you following the launch of ShareAction's latest report on banks' target-setting '**Mind the strategy gap: how disjointed climate targets are setting banks up to miss net-zero. An assessment of the decarbonisation and sustainable finance targets set by Europe's largest banks**'. We are extremely grateful for your sustainability team's contribution to our report and for all the positive engagement we have had with UBS, such as Megan Morrow's attendance at our green finance roundtable.

We are approaching 2025, the five-year countdown to 2030 – a key milestone financial institutions are working towards in their net-zero trajectories. Climate disaster continues to worsen at an alarming rate. Scientists from the World Weather Attribution (WWA) report that 2024 saw the deadliest swathe of extreme heat waves ever recorded, including in Europe, where in July alone there were at least 23 fatalities due to intolerable temperatures across Portugal, Spain, France, Italy and Morocco. Recent severe flooding in Valencia, Spain, has affected 74,400 people, resulting in an estimated death toll of over 200 people. Banks play a critical role in averting unliveable climates by reducing their finance to fossil fuels and increasing finance to sustainable alternatives. There has never been a more important time for banks to ensure their net-zero strategies are underpinned by scientifically robust and complementary decarbonisation and sustainable finance targets, designed to have a real-world impact on the green transition of the global economy.

ShareAction's latest report shows that banks have made progress on setting an array of targets to reach net-zero by 2050. Positively, Europe's 20 largest publicly listed banks have now all committed to net-zero by 2050, and most banks now report progress against their sectoral decarbonisation targets annually in relative and absolute terms. However, our report finds that banks' sustainable finance and decarbonisation targets are disconnected from each other, employing inconsistent designs, diverging accounting practices, and different timeframes. It is particularly concerning that so few sustainable finance targets are grounded in climate scenarios or the investment needs of specific sectors to transition. They lack both the scientific foundations and granularity that banks need to navigate complex transitions, overcome constraints on progress, and cultivate new opportunities for their services. The incentive to artificially inflate targets rather than engage in the hard work of growing sustainable finance means the current generation of

targets are unlikely to shift the necessary capital to meet their own net-zero goals, increasing the risk of a disorderly transition.
Our analysis showed that whilst all 20 banks have set at least one sector-specific decarbonisation target, only nine banks have set sector sustainable finance targets. This makes it difficult for investors to know how the bank is planning to decarbonise specific sectors, and whether it plans to allocate any of its sustainable financing to specific clients and/or activities to ensure it meets its decarbonisation intentions and achieve real world impact. For example, the absence of targets specific to the power sector makes it hard for external stakeholders to understand how the bank's sustainable finance initiatives and investments will support their net-zero and decarbonisation commitments and help them navigate the complexities of the energy transition. Meanwhile, many sustainable finance frameworks fail to include grids and storage, raising questions about whether banks are deploying their capital strategically to sustainably scale renewable energy capacity and overcome barriers to deployment, thus having real-world impact.

It is positive that UBS has set an overarching sustainable finance target, but the bank does not currently disclose which sectors are included, nor the methodology behind how it is quantified.

We are calling on banks to set targets which are ambitious, transparent and coherent. We ask that UBS:

1. Ground its sustainable finance targets in a clear robust methodology, disclosing how sustainable finance targets are quantified relative to the bank's decarbonisation commitments or credible scenarios, whilst also acknowledging UBS' historical responsibility;
2. Set sectoral targets to underpin high-level sustainable finance targets, starting with renewable energy, and outline a strategy for increasing finance for enabling infrastructure and early-stage technologies;
3. Ensure its decarbonisation and sustainable finance targets are set in a consistent and comparable way by:
    a. Including the same products and services
    b. Applying the same accounting principles
    c. Using consistent time frames
4. Demonstrate how these targets – now coherent and consistent – are leading to real-world impact by disclosing:
    a. How UBS' emissions reductions are driven by clients' performance and changes in exposure, and how changes in exposure are driven by its sustainable finance;
    b. Which sectors, activities, and types of financing are in scope of sustainable finance targets and the criteria used to define what constitutes sustainable finance;
    c. The real-world impact of the bank's sustainable financing, starting with energy.
5. Complement these targets with robust sector policies which consider human rights and environmental impacts (such as financing exclusions for companies expanding oil and gas).

Banks should be doing a lot more than they are currently doing to finance the transition to a green and just economy. But, as our report recognises, the success of banks' targets also relies on external factors. Banks should transparently highlight which parts of their strategy critically depend on the actions of others and use their influence to ensure capital flows to sustainable activities at the scale and pace needed to avert the climate crisis. We encourage UBS to set sector targets even in sectors facing regulatory challenges or other obstacles, and for the bank's leaders to highlight where and how these structural barriers could be alleviated in aid of more impactful sustainable financing. Importantly, target-setting is not a substitute for setting and adhering to robust sector policies, such as ending project and corporate finance for oil and gas companies with expansion plans.

We are committed to engaging with and supporting UBS in the development of its policies and targets, and hope that our constructive dialogue will continue throughout 2025. As a next step, we expect you to take material action on your sustainable finance strategies by the end of 2025 by adhering to the asks above, or ShareAction and investors may consider taking escalatory action in 2026.

I ask that you respond to bankingteam@shareaction.org in writing by the **15th February 2025**. I truly wish you and your team a wonderful Christmas break and look forward to building on our valuable relationship in the new year.

Warm regards,

Jeanne Martin
Head of Banking Programme
ShareAction