

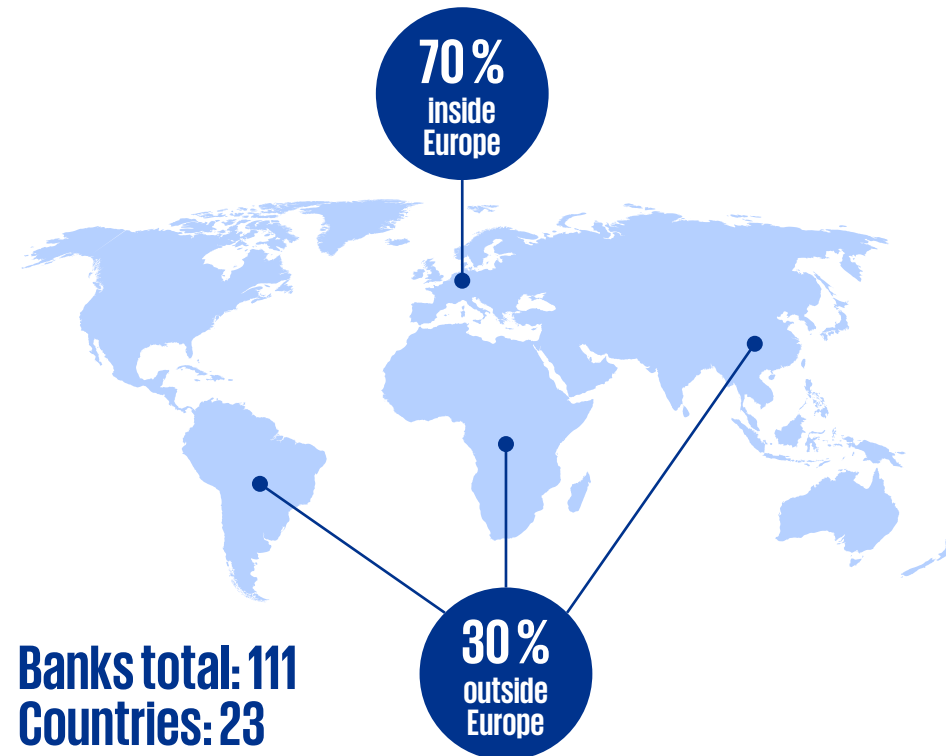


Annual KPMG ESG Risk Survey 2026

June 2026

The KPMG ESG Risk Survey 2026 provides implications on top trends and benchmarks from 111 banks in 23 countries

Participants



Agenda



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Executive summary: The ESG risk journey for banks continues, yet with a shifted focus on organizational & cost efficiencies



Global importance of ESG risks

Globally, ESG risks are widely recognized as critical - yet approaches vary between regions.



Mismatch: Ambition vs. investment

Despite strategic ambitions, gaps in execution persists. Investments and resource allocation for ESG remain limited across many banks.



Scenario analyses as most critical ESG risk tool

Across all banks, scenario capabilities are seen as (very) important and as the most relevant tool for managing future risk exposures.



Diverging transformation paths

Non-EU banks for the first time accelerate investment faster than EU institutions – yet for many, a gap remains between defining ESG metrics and actively steering risk.



Emerging nature risks

Nature risks are gaining importance but are still at an early stage. Data availability, methodologies, and scenario coverage remain limited.



Data, AI & regulatory pressure

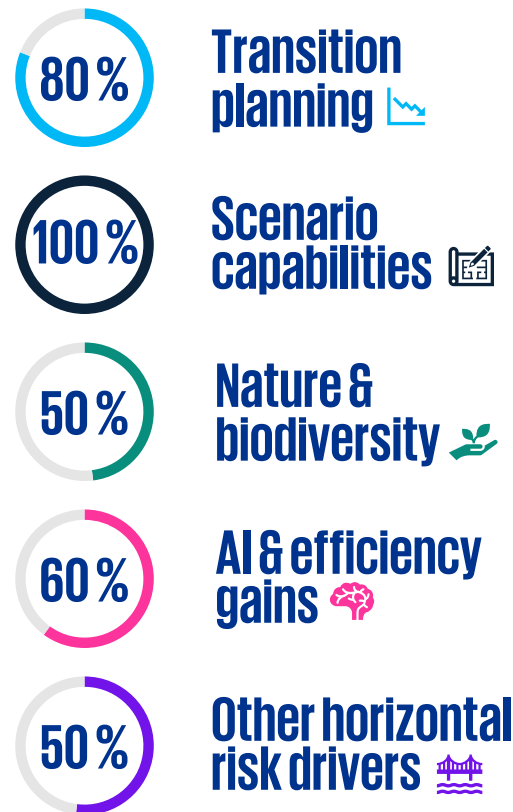
Data and AI act as key enablers, yet data quality and availability continue to limit progress. Regulatory pressure, particularly in EU, drives advances.



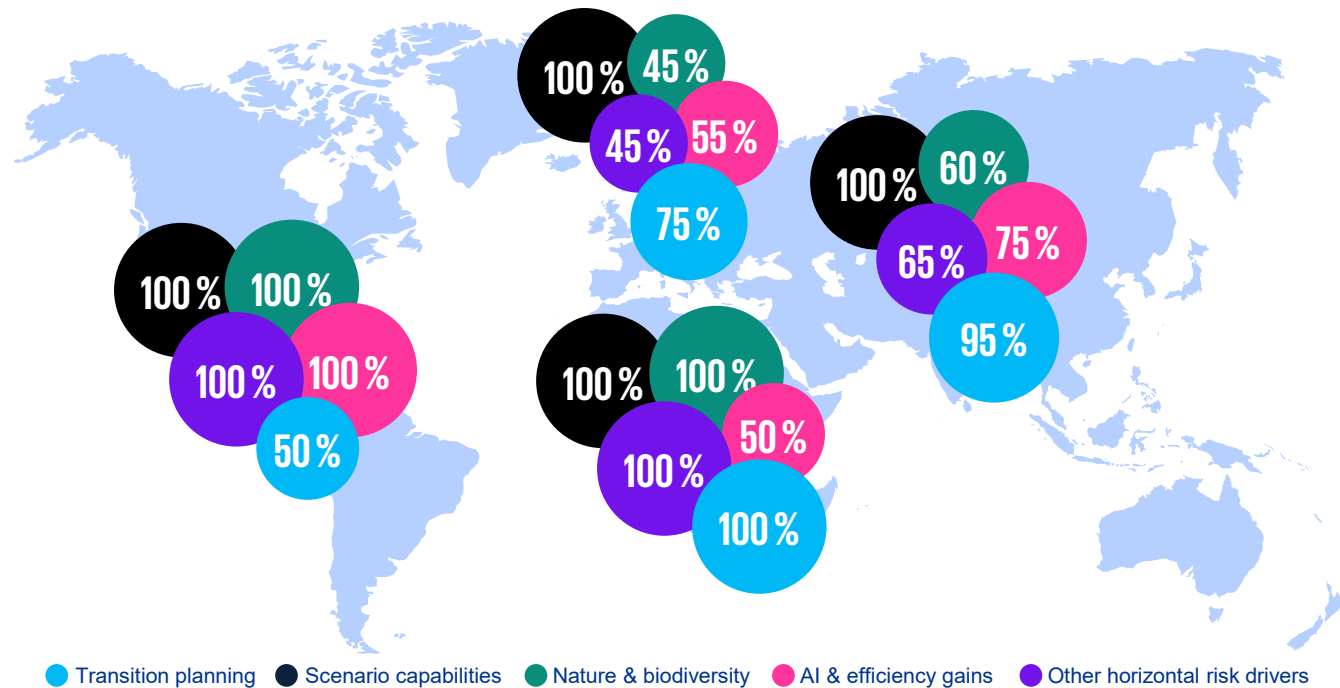
01 Top Trends

Most banks consider the following top trends as important or very important within the next two years

(Very) important trends



Distribution by continent

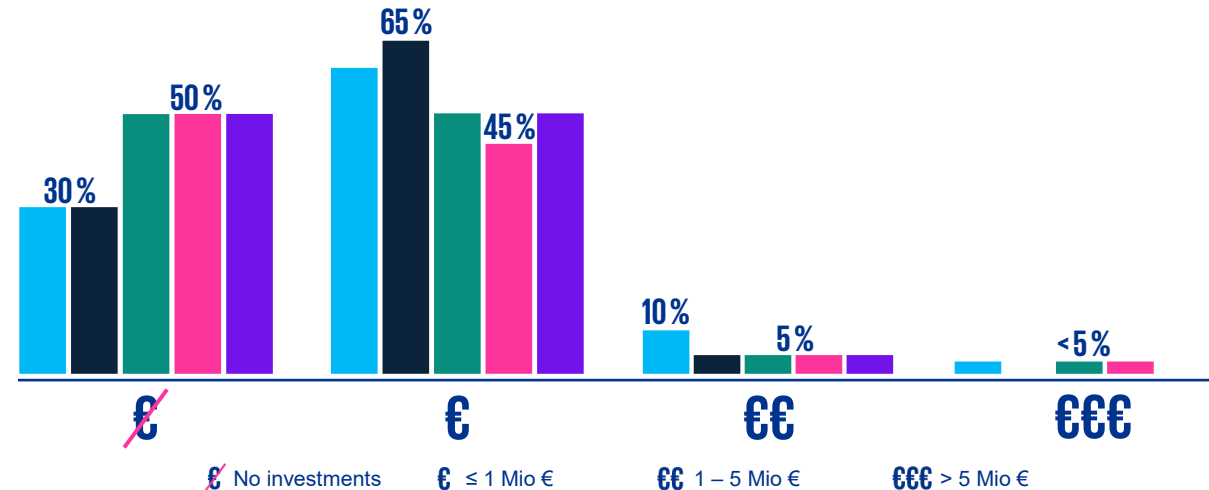


While all participating banks agree that scenario capabilities will be (very) important to their organizations over the next two years, other key trends show a strong regional variation. Above all banks outside of EU place greater importance on ESG trends, especially *nature & biodiversity* and *other horizontal risk drivers*.

The importance attributed to ESG trends is not yet reflected in planned investments and resource allocations

Investments planned in the next two years

The **global perspective** on the planned financial investments over the next two years shows a reserved readiness to invest (€) in ESG top-trends regardless of the importance stated to it.



The **regional comparison** reveals a clear divergence: banks outside the EU consistently report higher levels of investment and financial commitment across all major ESG trend topics. This reflects the fact that European banks have already committed considerable financial and internal resources.

Expected full-time-employees

Banks continue to invest into their ESG initiatives by employing 1-2 ESG-specific full-time employees (FTE) per ESG trend (in sum: Ø 5.7). The current momentum in transition planning is also reflected here.



Transition planning Scenario capabilities Nature & biodiversity AI & efficiency gains Other horizontal risk drivers

Transition planning is at the core of risk management, but banks struggle with metrics and client engagement

Major challenges



Client engagement

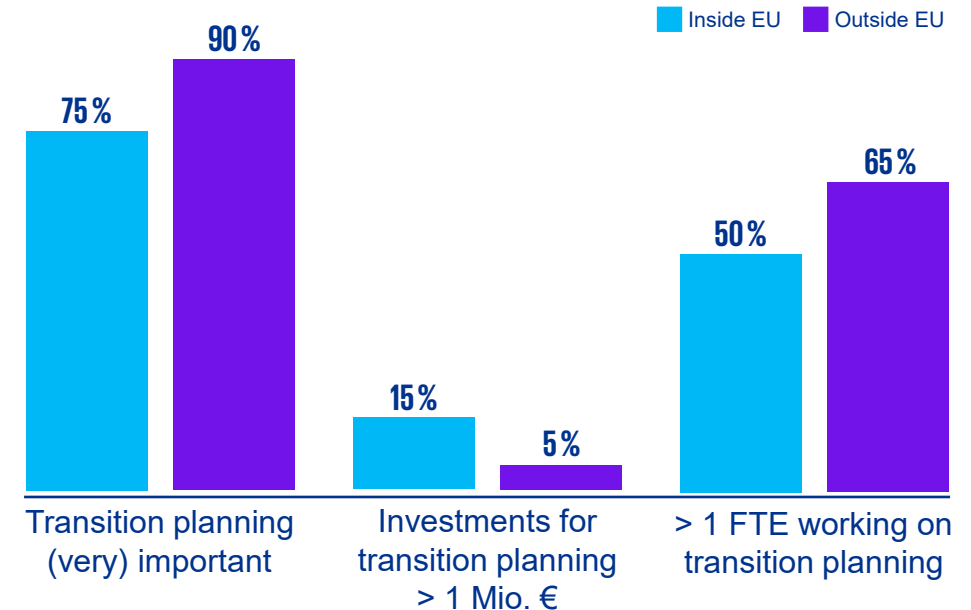
Transition planning serves as a core framework that links strategy, progress monitoring, materiality assessment, risk appetite, profitability steering, product offering, and client engagement. In this context, structured client engagement is essential, as it enables the collection of reliable, client specific data, including transition plans, that cannot be obtained from external sources alone.¹

Transition planning is becoming a core part of risk management, yet around 70 % of banks struggle to align metrics with objectives and strengthen client engagement. Going forward, integrating and actively using client engagement metrics will be critical to effectively steer transition risk.

¹Good practices for climate and nature risk management

Global perspective

Mismatch: ambition vs. investment



Even though transition planning is considered (very) important in the coming years, banks do not have the financial and personal capacities yet to promote and expand their knowledge and processes regarding transition planning.

Scenario analyses are widely recognized as critical, but especially long-term analyses are rarely ready yet

Major challenges



Resilience analysis

Unpredictable developments are pushing banks to adopt new management paradigms.

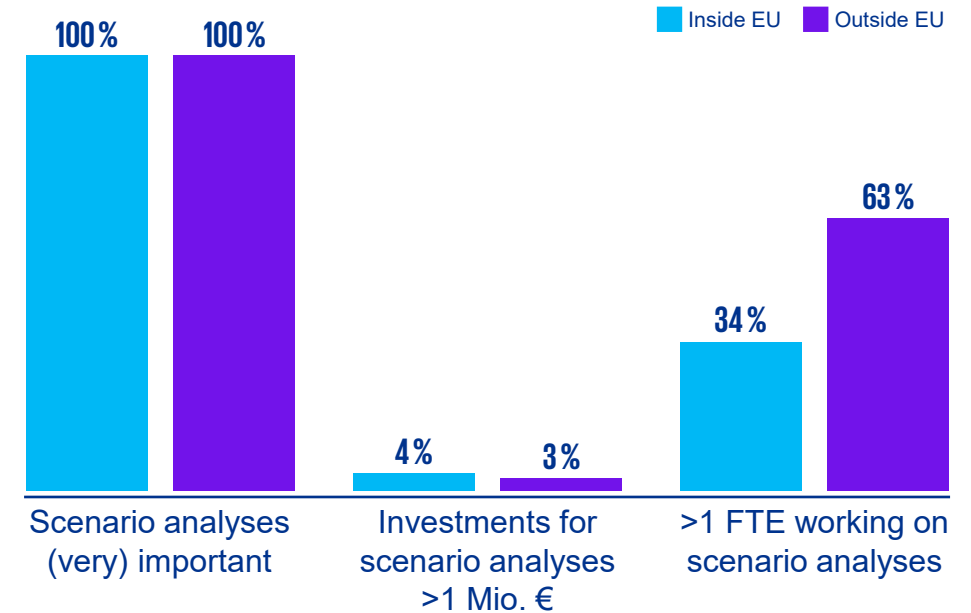
Resilience analysis assesses how robust a bank's business model remains over a medium- to long-term horizon (at least ten years), focusing on its ability to withstand structural change. It emphasizes strategic adaptability to different future scenarios.¹

Banks should prioritize improving data availability as the key bottleneck, while advancing the implementation of long-term resilience analyses (10+ years) as a new regulatory expectation. Short- and medium-term stress testing frameworks remain critical to ensure a consistent and forward-looking risk view.

¹Final report on environmental scenario analysis (EBA/GL/2025/04)

Global perspective

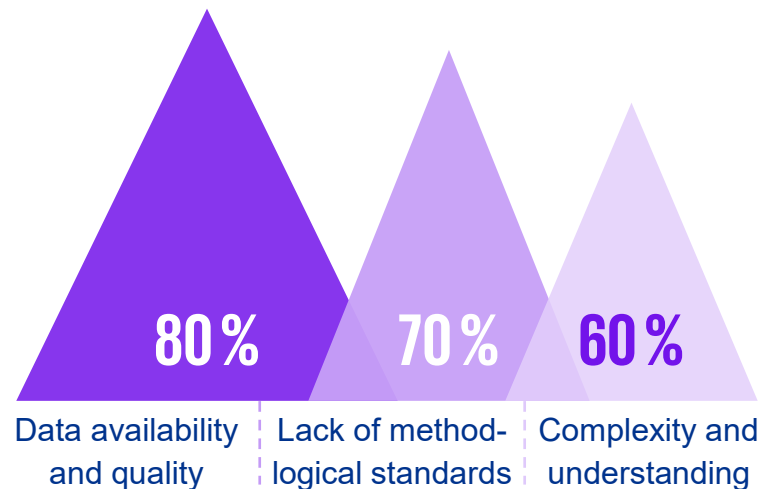
Mismatch: ambition vs. investment



Banks outside EU are still at an early stage, while for EU-institutions the topic is highly regulator-driven and more prominent on their radar. Many non-EU banks remain in a wait-and-see mode, despite starting to allocate initial resources.

Nature risks are a challenging undertaking, a minority of banks has yet taken up the challenge

Major challenges



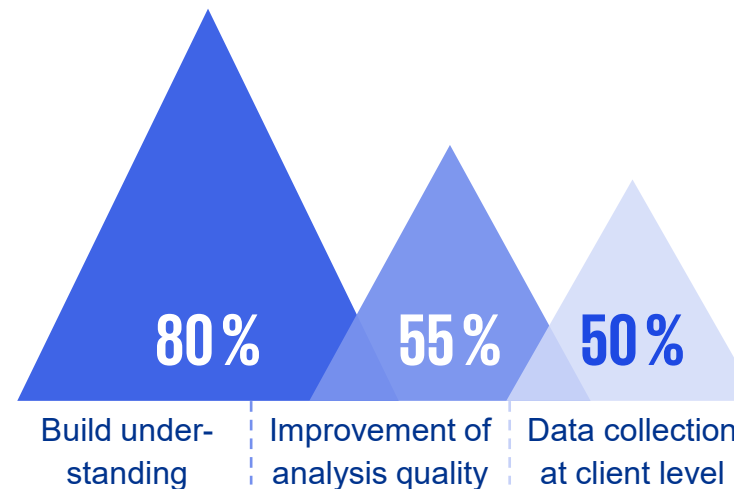
Still an early stage

A significant number of banks remain in the early phases of their nature-related assessments. Although awareness of the topic's relevance is high, constrained financial and human resources limit progress towards more comprehensive analyses.²

¹Good practices for climate and nature risk management

²Respondents could select multiple answers, therefore, percentages may exceed 100 %.

Anticipated measures



Nature scenario analysis at early stage

Against the ECB's agenda and the strong momentum of scenario analysis, 90 % of the banks have not yet developed scenarios for their nature risks. This trend does not seem to slow down: Only 45 % of the banks anticipate nature scenarios a potential measure for the development of nature and biodiversity risks. Only 40 % of the banks see nature scenarios as challenging, indicating that this subject has not yet been thoroughly addressed.²

Nature KRIs

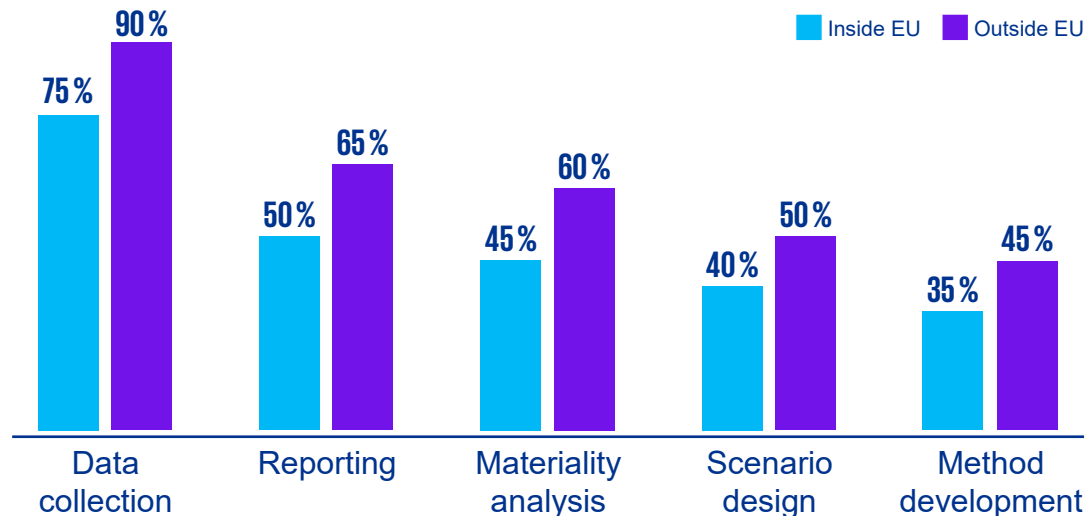


Only a few banks have defined nature-related KRIs to date.

Where KRIs do exist, they are mostly used for monitoring purposes only, without hard limits or thresholds being set that would trigger specific actions. However, nature-related risks will become increasingly important in the coming years – which is why targeted KRIs are necessary to address the most urgent nature-related risks in greater detail.¹

EU banks show greater caution in AI adoption amid rising data risk compared to banks outside EU

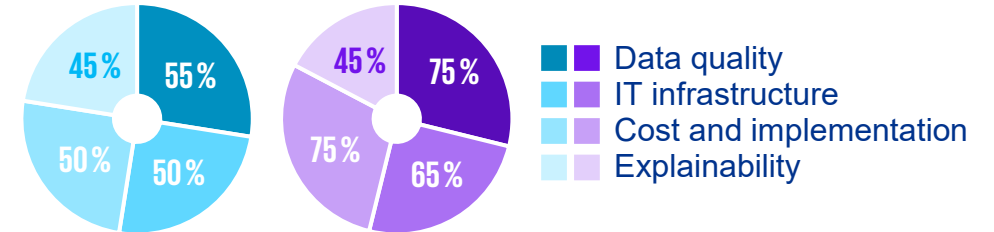
AI use-cases for ESG risk frameworks



Across all markets, data collection clearly emerges as the primary AI use case, driving efficiency in ESG risk frameworks. At the same time, AI-related topics appear more relevant for Non-EU banks, reflecting differing strategic priorities. Beyond data collection, results remain dispersed, indicating that AI adoption is still selective rather than systematic, and that overall maturity remains at an early stage.¹

¹Respondents could select multiple answers, therefore, percentages may exceed 100 %.

Major challenges



Data maturity among banks remains uneven, indicating that data collection practices are still at an early and inconsistent stage. Data collection is clearly the top priority but needs to be supported by more tangible use cases, which are currently still very limited.¹

Good practice: GREENScreening



GREENScreening is a modular tool that aggregates and analyzes data from web sources, newscasts, and social media. It uses AI to transform large amounts of unstructured data into relevant information through sentiment analysis, intelligent filters, and automatic text analysis. This enables automated risk assessment, early detection of critical developments, and efficient reporting.

Banks demonstrate strong awareness of horizontal risk drivers, but holistic frameworks remain in early stages

Geopolitical risks



According to the World Economic Forum, geopolitical conflicts rank among the greatest short-term risks.¹ Germany's financial regulator warns that export-reliant economies are particularly vulnerable to such shocks.² These warnings underscore the connection between geopolitics and ESG: regulators' emphasis requires financial institutions to integrate geopolitical scenario planning into the risk management.

Horizontal risk drivers

Risks that have a holistic impact on a bank's traditional (vertical) financial risks, e.g., credit risk, liquidity risk, etc.

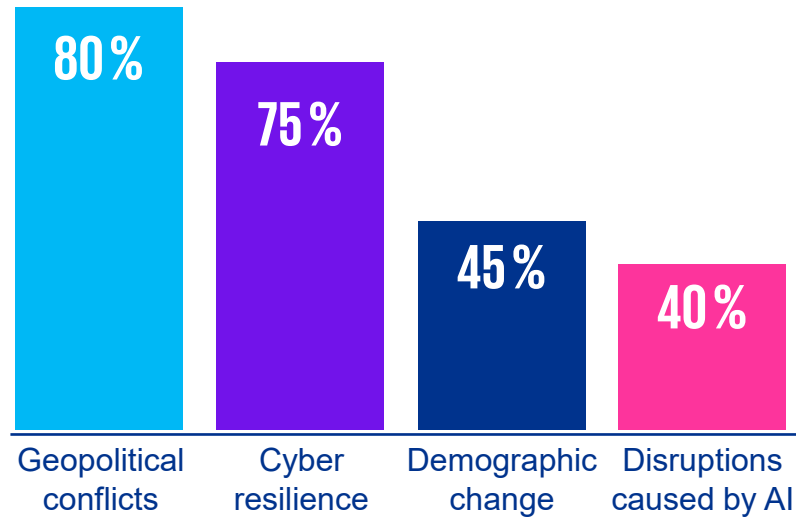
Emerging risks

Risks arising from structural changes such as geopolitical shifts, regulatory dynamics, or environmental developments.

Novel risks

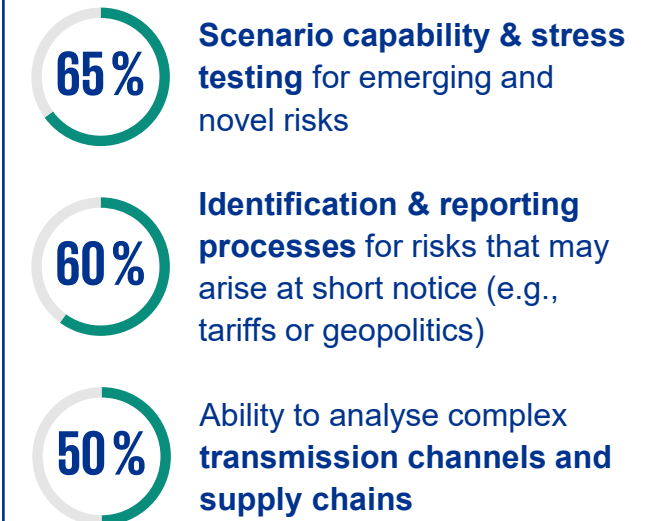
New types of risks whose potential effects are uncertain, e.g., due to a lack of historical data or control mechanisms.

Relevant horizontal risk drivers³



Anticipated measures

Successfully expanding risk frameworks to include additional horizontal risk drivers requires both a structured approach and a holistic, wide-angle perspective. Across markets, the following key steps are emerging as priorities:



¹Global Risk Report 2026

²BaFin concerning geopolitical disruptions

³Respondents could select multiple answers, therefore, percentages may exceed 100 %.

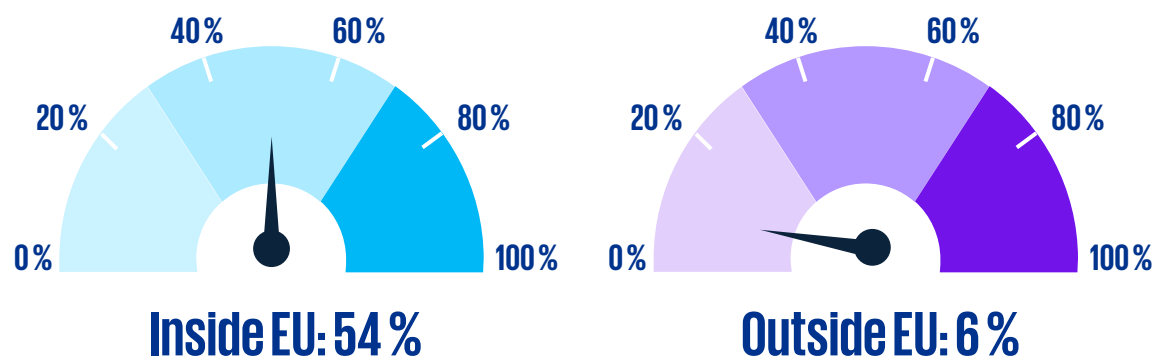
An aerial photograph of a beach. The top half of the image shows a wide, sandy beach with several small figures of people scattered across it. The bottom half of the image shows the ocean with a line of white, foamy waves crashing onto the shore. The water is a deep, vibrant blue-green color.

02 Benchmarks

Regulatory pressure in the EU generates impact, and ECB sticks to its position: Half of EU-banks received findings

Number of findings in- and outside EU

Inside EU the number of findings received remains stable compared to 2025 suggesting that the regulatory pressure concerning ESG remains high. More than half of European banks received ESG findings, reflecting the ECB's stringent supervisory approach. Findings outside EU declined compared to 2025 to a surprising low.¹



Banks have improved their practices for managing climate and nature-related (C&N) risks in recent years. All banks under our supervision now have the foundational architecture in place to identify, quantify and manage the risks from the ongoing climate and nature crises.²

Frank Elderson ECB Executive Board Member and Supervisory Board Vice-Chair

¹No differentiation between material and non-material findings.

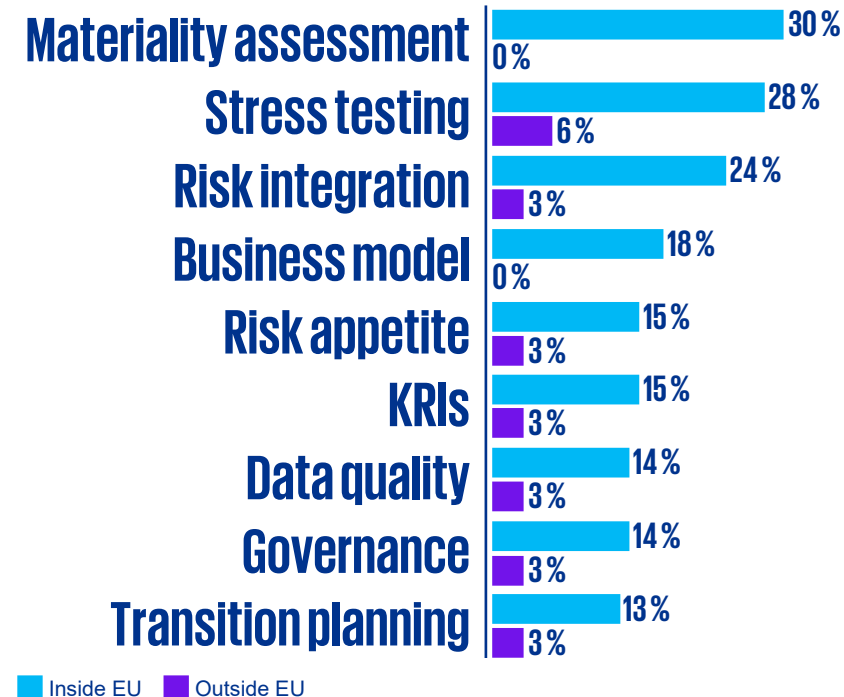
²ECB Blog Good practices for climate and nature risk management

³Respondents could select multiple answers, therefore, percentages may exceed 100 %.



Findings

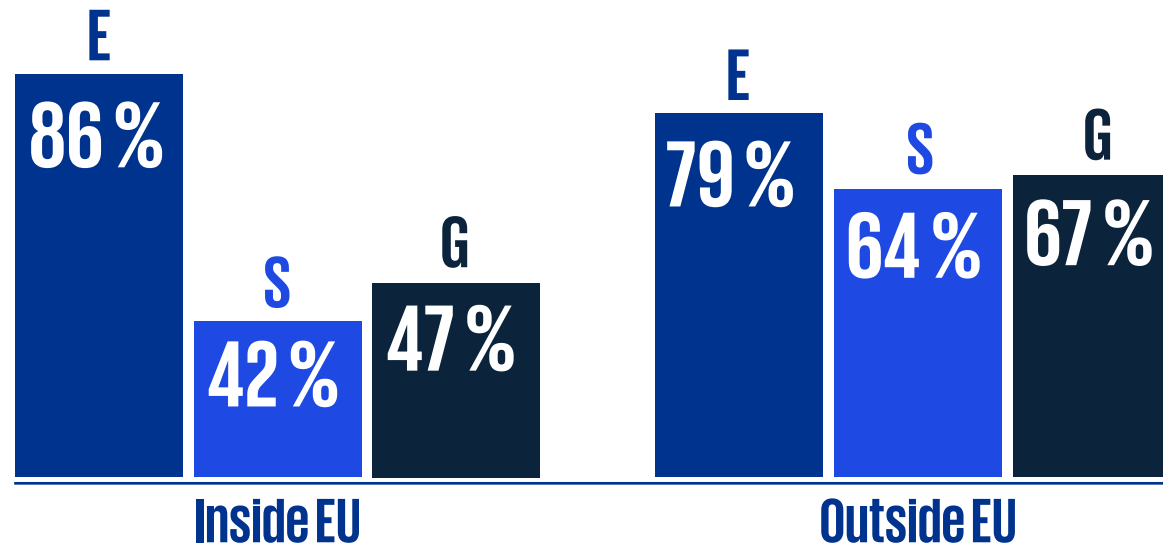
Materiality assessments remain the main driver of ESG findings in the EU, with results concentrated on methodological areas, while findings outside Europe remain limited.³



Environmental risk drivers remain the main reason for material ESG risks. Social- and Governance- risks continue to rise

Materiality of E-, S- and G-risk drivers

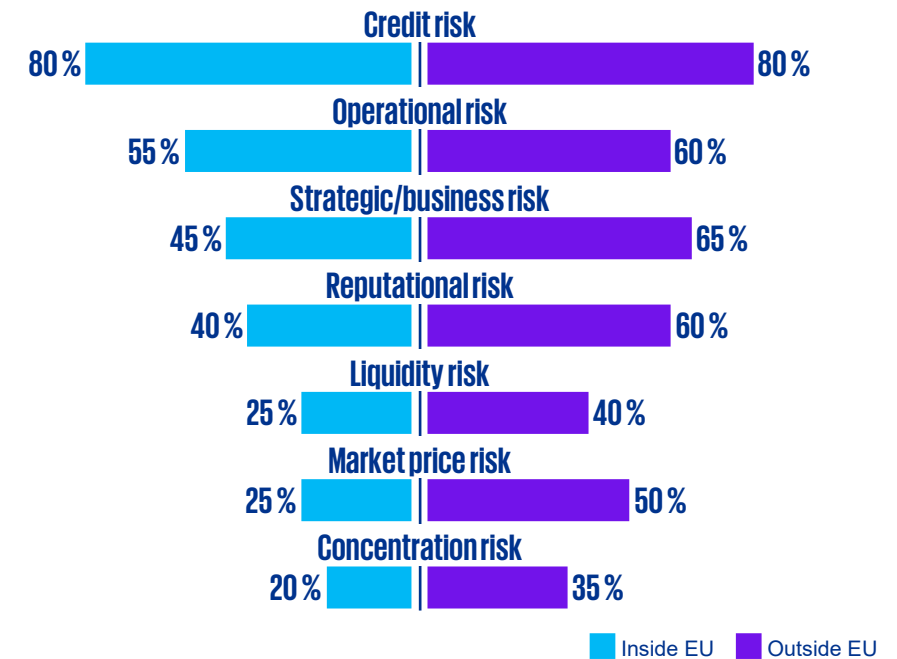
E-risk drivers continue to be classified as material most often. While a clear materiality gap between E- and S- & G-risks persists within the EU, banks outside the EU show a more heterogeneous picture, potentially reflecting less prescriptive regulatory guidance and differing market priorities. Compared to 2025, the focus on S- and G-risk drivers has also increased within the EU. However, this growth is significantly more pronounced outside the EU.



¹Respondents could select multiple answers, therefore, percentages may exceed 100 %.

Materiality per risk type

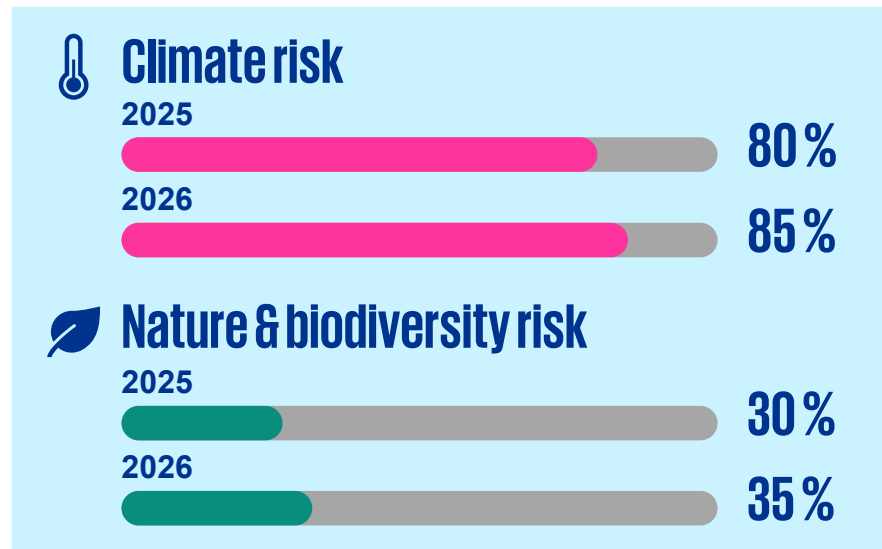
While credit risk remains the primary material risk type across regions, banks outside the EU assess ESG risks more broadly across risk types, indicating a more expansive but potentially less standardised materiality approach compared to the EU.¹



Deep Dive: Materiality and steering of E-risk drivers divided by climate-related and nature-/biodiversity-related risk drivers

E-materiality

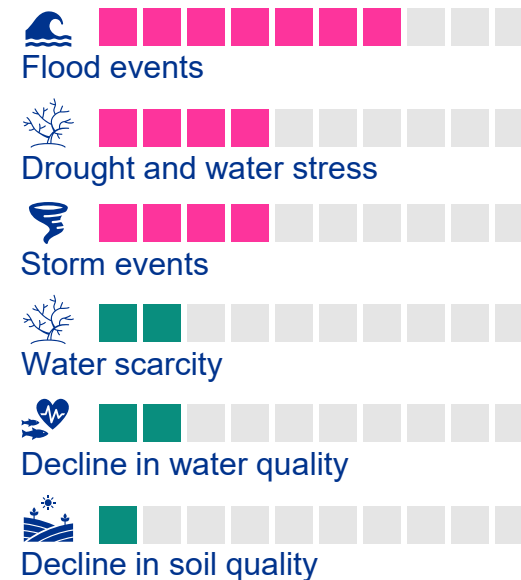
E-risk drivers are divided into climate-related risk drivers and nature & biodiversity-related risk drivers. While climate risks are already firmly anchored in banks' risk frameworks and continue to strengthen, nature and biodiversity risks are rapidly gaining traction, signalling a broadening and maturing approach to environmental risk management globally.



Material climate and nature risk drivers

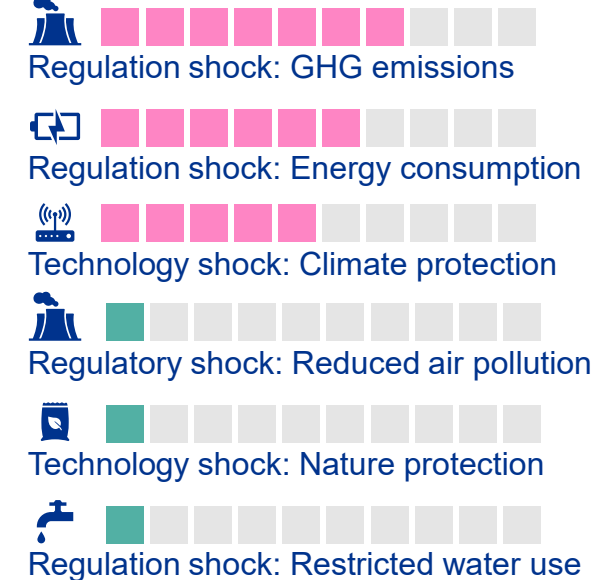
Physical risk drivers are mainly driven by flood events and water-related aspects. Transition risks, are primarily driven by regulatory shocks. From a transition perspective, climate risks are currently still more significant, which can largely be attributed to the comparatively stronger focus on climate policy at present.

Physical risks



Climate risk Nature & biodiversity risk

Transition risks



Most common ESG data sources and data challenges are universal among banks

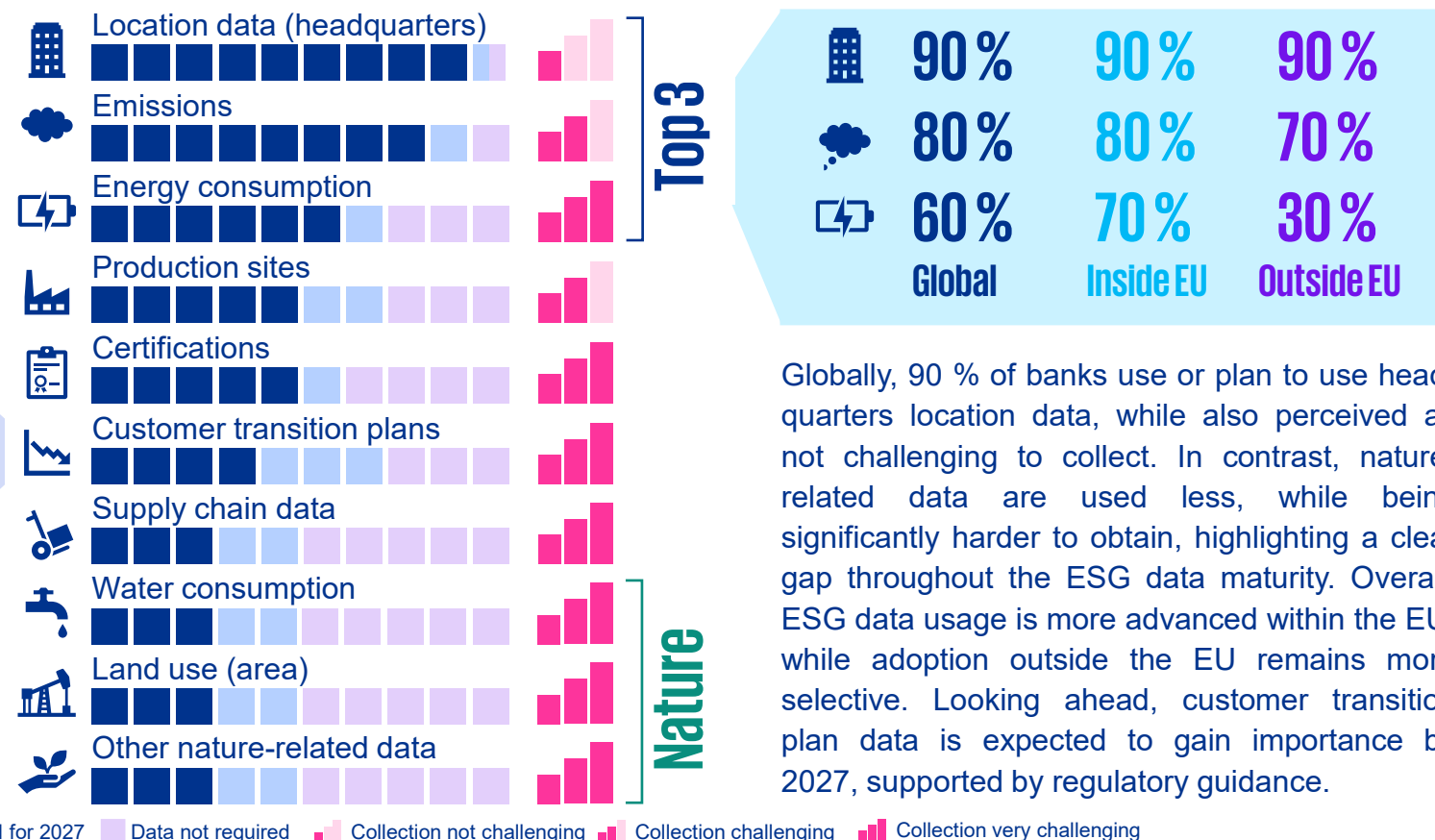
Client transition plan



Data from customer transition plans plays a crucial role in the future.

Financial institutions link transition risks to strategy, objectives, and risk management and leverage this information for their financial products. They are increasingly managing their portfolios in a targeted manner across various levels (portfolio, sector, customer) and using data and scenarios to monitor progress toward objectives and take corrective action when deviations occur. This is based on analyses of customer transition plans as well as KPIs and KRIs that measure progress and risks and trigger action in the event of deviations from targets.¹

Client data usage & level of difficulty in collection



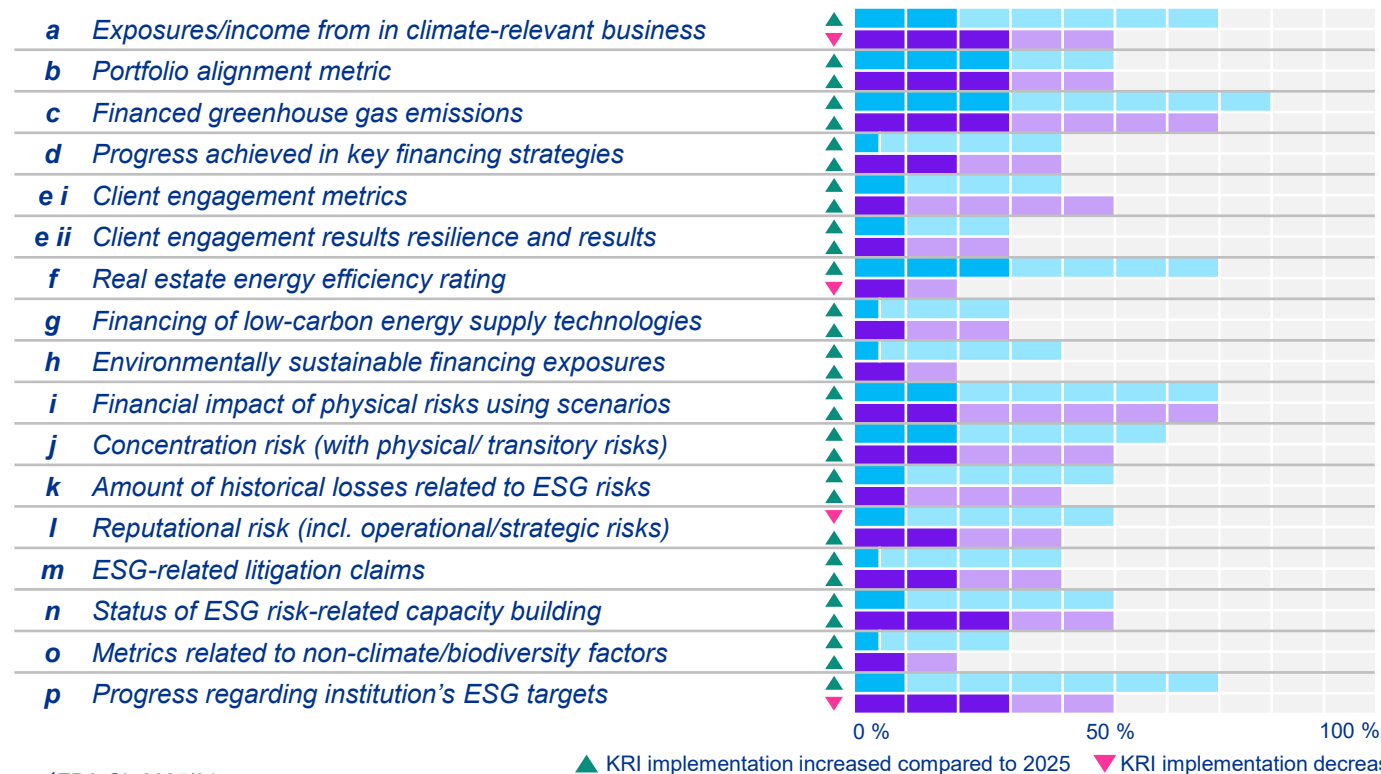
Globally, 90 % of banks use or plan to use head-quarters location data, while also perceived as not challenging to collect. In contrast, nature-related data are used less, while being significantly harder to obtain, highlighting a clear gap throughout the ESG data maturity. Overall, ESG data usage is more advanced within the EU, while adoption outside the EU remains more selective. Looking ahead, customer transition plan data is expected to gain importance by 2027, supported by regulatory guidance.

¹Good practices for climate and nature risk management, 2.1.1

Implementation of KRIs increased compared to 2025 globally - actual steering impulses still limited

KRIs monitored & steered

ESG key risk indicators as in EBA GL §81¹



Inside EU

■ KRI monitored
■ KRI steered

EU banks show strong ambition in defining KRIs, closely aligned with material risk drivers. This trend is also strengthened compared to 2025: Every KRI from the EBA Guideline is now more often defined than in previous years, indicating the effectiveness of regulatory pressure.

However, only a few KRIs are used for actual steering of ESG-risks, as opposed to monitoring only. This shows a gap between regulation-driven definition of a KRI and practical application.

Outside EU

■ KRI monitored
■ KRI steered

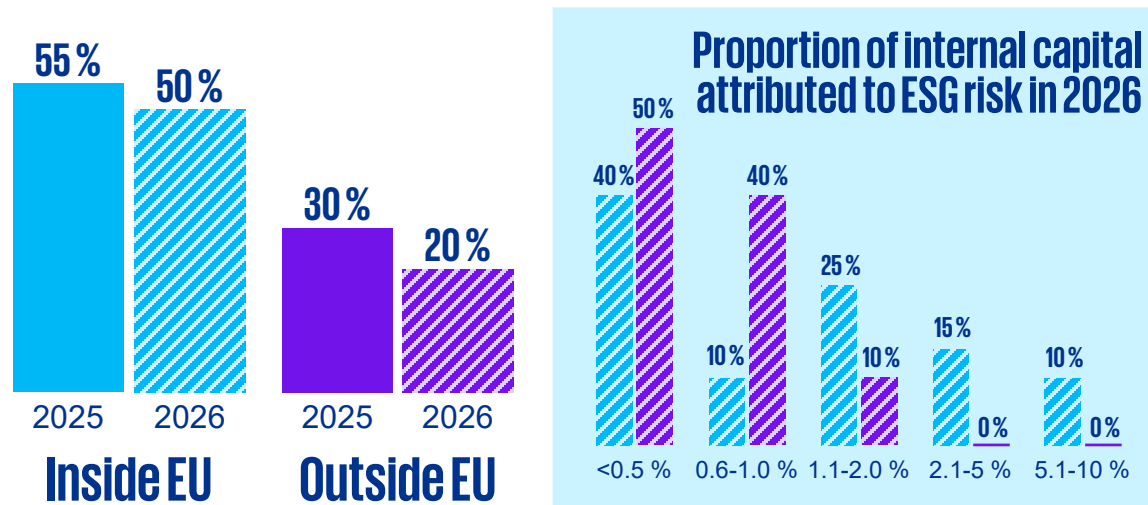
While banks outside the EU define fewer KRIs, the correlation between defined and steered KRIs is stronger than inside the EU with almost half (42 %) of the defined KRIs also being steered.

¹EBA GL 2025/01

“Where the rubber meets the road”: Banks progress in allocating capital and loan loss provisions to ESG risks

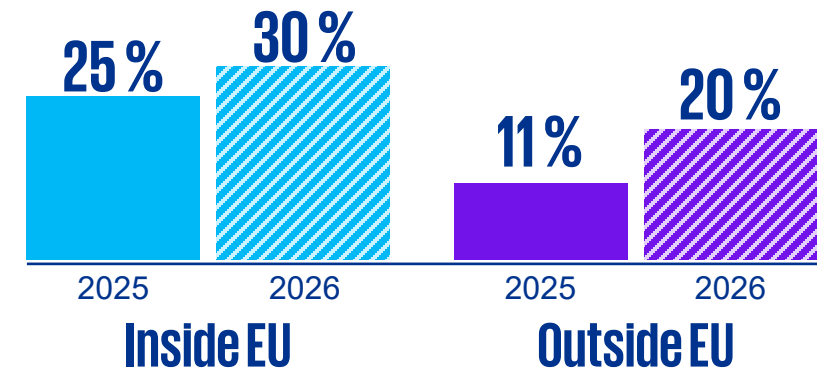
Internal capital requirements

This year's survey sample shows a similar level of banks already considering ESG risks in their internal capital requirements compared to 2025. Practices vary substantially across regions: Half of EU banks consider ESG risks in their internal capital requirements, while outside EU this marks only 20 % of the banks. The proportion of the total internal capital requirements attributed to ESG risk inside EU are widely distributed, while outside EU banks tend towards lower amounts.



Risk provisioning

In 2026, a larger share of institutions attributes risk provisioning to ESG risks compared to 2025, particularly among banks outside the EU, where the share has almost doubled to 20 %.

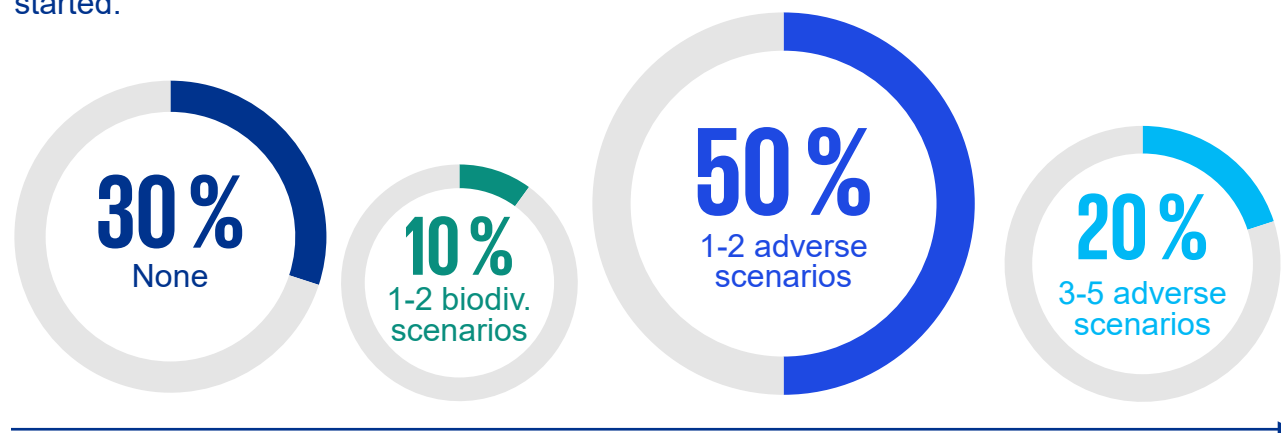


Post-model adjustments (PMAs) represent one mechanism to incorporate ESG risks into provisioning. Findings from a separate internal KPMG survey indicate that PMAs are increasingly used to capture cross-cutting, horizontal risk drivers, including ESG and trade-related risks.

Even though scenario analysis is a major trend in the coming years, the current implementation seems to fall short

Status quo

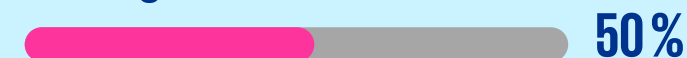
100 % of banks value scenario capabilities as important or very important within the next two years for their institution. Yet the current maturity still lags behind. 30 % of the banks have not conducted any adverse climate scenarios yet. Also, the biodiversity coverage remains minimal. However, momentum is building. Nearly half of the banks have started at least one scenario, and 20 % are already scaling up. This suggests that implementation will accelerate rapidly under the continued regulatory pressure. A two-speed landscape seems to emerge: advancing early movers versus a significant share that has yet to get started.



Long-term adverse scenarios

Globally, almost 50 % of the banks have not yet analysed a long-term scenario over 10 years. This is probably driven by the lack of data and further by the lack of tools and understanding for long-term scenarios. However, 50 % have already reported these scenarios already – indicating clear progress.

No long-term scenarios



1-2 long-term scenarios

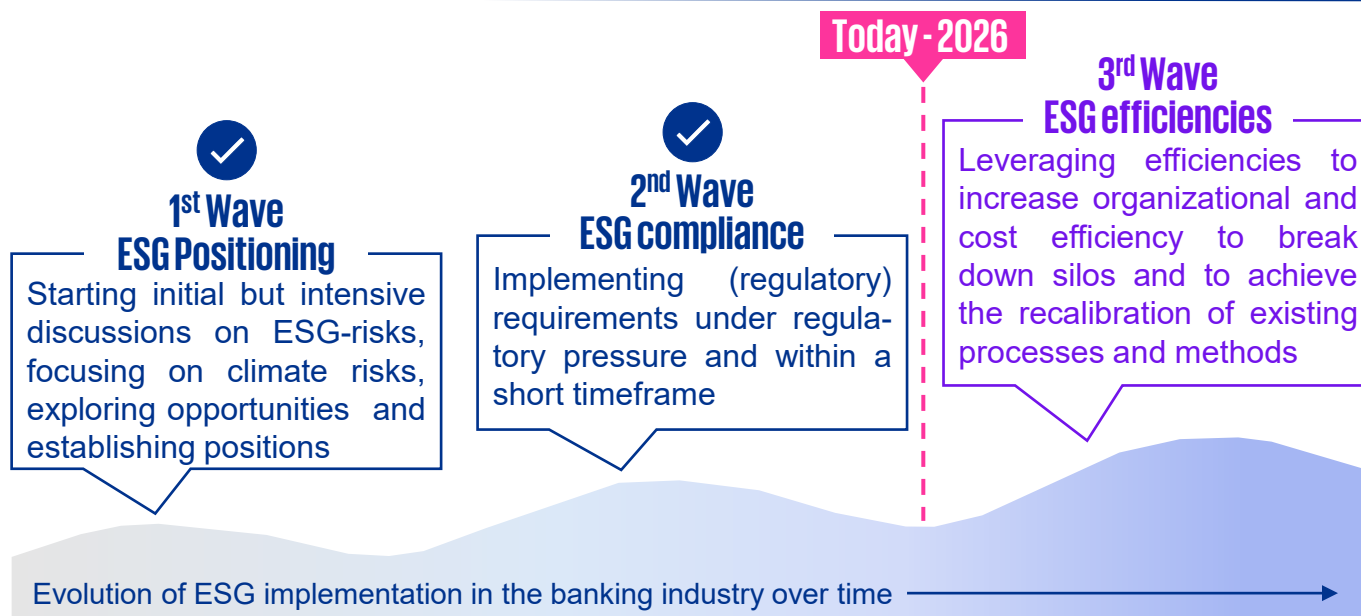


3-5 long-term scenarios



Conclusion: Banks are taking their foot off the gas and focus on efficient driving. Yet the ESG journey for banks continues

Waves of ESG implementation



Following the initial phase of ESG implementation, banks now face the challenge of integrating ESG into a stable and efficient long-term operating model, even though ESG governance structures at many institutions evolved under pressure and were not designed systematically. Moreover, ESG's declining priority on political agendas, contrasted with regulators continued strong focus on the issue, undermines banks' ability to identify the right long-term path.

ESG operating model

An integrated ESG operating model offers opportunities to improve processes, avoid inefficiencies and reduce operational costs. The following five dimensions should be considered:

- 1 Roles & Responsibilities** *Define ESG ownership and governance structure*
- 2 Processes & Procedures** *Embed ESG criteria into core processes*
- 3 ESG Data, IT & AI** *Centralize ESG data and enable AI-driven insights*
- 4 ESG Methodology** *Standardize ESG methods across use cases*
- 5 Personal & Know-How** *Build and track ESG capabilities*

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