



Do banks practice what they preach? Brown lending and environmental disclosure in the euro area

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AIM OF THE PAPER

We analyse the relationship between **bank transparency** and their **lending** decisions;

✤By using confidential loan-level data, we assess whether those banks that provide higher (lower) levels of environmental disclosure provide more (less) lending to green firms;

✤We investigate whether such relationship is influenced by bank managers' beliefs and awareness of environmental risks, (reflected in the tone of the disclosures).





THE IMPORTANCE OF DISCLOSURE

Transparency is a fundamental prerequisite for the effectiveness of market discipline (Nier & Baumann, 2006);

- Banks are notoriously opaque because of their risk-taking and maturity transformation role (Flannery et al., 2013);
- Inadequate disclosure by banks is considered amongst the causes of the GFC (Sowerbutts et al., 2013);
- ✤Disclosure reduces the cost of capital (Diamond & Verrecchia, 1991).





THE IMPORTANCE OF ENVIRONMENTAL DISCLOSURE

The main focus has traditionally been on the financial dimension of bank disclosure (Polizzi, 2022);
 Various recent initiatives to improve non-financial disclosure:

Global Reporting Initiative;
Carbon Disclosure Project;

Also with specific reference to the banking industry:
 Task Force on Climate-related Financial Disclosure;
 Montréal Carbon Pledge.





INCENTIVES FOR GREENWASHING BEHAVIOUR

Despite regulatory efforts, banks may engage in «greenwashing» (i.e. increasing environmental disclosure without actually acting as environmentally responsible lenders);

Various incentives:

To improve their ESG ratings;

To attract more investors concerned about environmental risks (Yang, 2022);

✤To manage the pressure of regulators, governments, customers and other stakeholders.





CHALLENGES IN SPOTTING BANK GREENWASHING BEHAVIOUR

Lack of granular data

No ready-to-use measure of bank environmental transparency





WHICH THEORIES TO EXPLAIN THE RELATIONSHIP BETWEEN LENDING AND ENVIRONMENTAL DISCLOSURE?

Environmental disclosure can be used by banks as a **signal** of bank commitment to

combat climate change;

- manage environmental risks effectively;
- Imit their negative financial consequences.

Signaling theory (Spence, 1973)

Banks can use environmental disclosure to manipulate stakeholders' perceptions of their willingness to reduce their environmental impact, regardless of their actual behaviour.

Impression management theory (Goffman, 1959)





LITERATURE REVIEW - DISCLOSURE IN BANKING

The literature has mainly focused on financial risks (e.g. Pérignon & Smith, 2010; Barakat et al., 2014; Polizzi & Scannella, 2020);

♦ Various studies focus on **disclosure tone** (Martikainen et al., 2023; Ertugrul, et al. 2017) → Davis et al. (2015) show that **managers' optimistic / pessimistic attitude** is reflected in disclosure tone;

Some recent studies analyse CSR disclosure (e.g. Chantziaras et al., 2020; Andrés et al., 2023).





LITERATURE REVIEW - DISCLOSURE TONE

✤Davis et al. (2015) show that managers' optimistic / pessimistic attitude is reflected in disclosure tone;

✤Bank size, leverage, profitability and the characteristics of the BoD are amongst the main determinants of disclosure tone (Martikainen et al., 2023);

Ertugrul, et al. (2017): an ambiguous tone is associated to information hoarding by managers, which results in increased costs to get external financing;

Price et al. (2012): the tone of conference calls is a strong predictor of trading volumes and abnormal returns.





LITERATURE REVIEW - BANKING, ENVIRONMENTAL RISKS AND CLIMATE CHANGE

- ♦ González & Núñez (2021); An et al. (2021) \rightarrow banks can contribute to **sustainable development** by :
 - Financing green projects and energy transition;
 Reducing exposure towards carbon-intensive firms;
 Adjusting loan pricing;

Strong connection between financial stability and climate change (Giuzio et al., 2019; Battiston et al., 2017, 2021).





RESEARCH HYPOTHESES - SIGNALLING THEORY

Signalling theory (Spence, 1973): banks that provide low levels of lending to brown firms are (indirectly) less exposed to environmental risks and less affected by their negative financial consequences;

These banks have an incentive to signal their low levels of environmental risk exposure by providing higher levels of environmental disclosure in their annual reports.





RESEARCH HYPOTHESES - SIGNALLING THEORY

Stakeholders may also be interested on the **environmental impact** of the banking industry, regardless of the financial consequences (Thompson & Cowton, 2004);

Banks that lend more to green firms may be willing to signal that they are implementing strategies to act as an **environmentally responsible** lender \rightarrow higher levels of environmental disclosure.

H1A: There is a positive relationship between bank environmental disclosure and lending to green firms.





RESEARCH HYPOTHESES - IMPRESSION MANAGEMENT THEORY

◆Impression management theory (Goffman, 1959) → banks could intentionally reveal positive aspects while hiding others to manipulate stakeholders' perceptions;
◆Banks may use a 'cheap talk' approach (Dobler, 2008) and engage in greenwashing by disclosing environmental information without actually committing to environmentally responsible lending.

H1B: There is a negative relationship between bank environmental disclosure and lending to green firms.





RESEARCH HYPOTHESES - DISCLOSURE TONE

◆Disclosure strategies are shaped by the **beliefs, awareness, and attitudes of bank managers** (Fischer & Verrecchia, 2004; Davis et al., 2015); **◆**Those bank managers who are more aware and concerned about environmental problems inform investors about the negative financial and environmental consequences → **negative tone**.

♦If bank managers are not fully aware of environmental risks, they may be more optimistic and less concerned \rightarrow **positive tone**;

High levels of disclosure → greenwashing behaviour

H2: Banks using a positive tone in their disclosures provide less lending to green firms, while banks using a negative tone provide more lending to green firms.





METHODOLOGY - CONTENT ANALYSIS

✤We use a quantitative content analysis methodology based on a tailored disclosure dictionary to analyse financial and nonfinancial reports (Lang & Stice-Lawrence, 2015);

✤We selected the most relevant environment-related words from various sources (e.g. FSB Task Force on Climate-related Financial Disclosures; OUP Supplementary Dictionary of Renewable Energy and Sustainability; . . .).





METHODOLOGY - CONTENT ANALYSIS

Air quality	Alluvial	Alternative energy	Alternative fuel
Biodegradable	Biodiversity	Carbon	Chemical agent
Chemical emergency	Chem weathe Chloroflug	ate action	Climate change
Climate neutral	Chlorofluc n (CF	Coal	Compostable
Contamination	COP21	Critical habitat	Deforestation
Desertification	Ecology	Ecosphere	





METHODOLOGY - CONTENT ANALYSIS

Each report is modeled as a «bag of words» (Buehlmaier & Whited, 2018);

Reports have been pre-processed removing non-alphanumeric characters, tables, charts and graphs;

✤We stemmed all words to capture each relevant term, regardless of their suffixes (Peterson et al., 2015);

 $Disclosure_Index_b = \sum \frac{occurrences \ of \ the \ words \ of \ the \ dictionary}{total \ number \ of \ words \ of \ the \ report}$

Similar approach to measure disclosure tone (Loughran & McDonald, 2011).





METHODOLOGY - CONTENT ANALYSIS

 $Robustness test \rightarrow alternative disclosure index (Brown &$ Tucker, 2011)

 $BT_Disclosure_Index_b = \sum \frac{occurrences of the words of the dictionary}{total number of words of the report} * \log(dt)$



A = total number of documents of the sample;m = number of documents in which that specific word appears.





METHODOLOGY - DATA

Data	Sources
Loan-level data	Anacredit
GHG emissions	Urgentem
Bank-level balance sheet variables	ECB supervisory statistics
Firm-level variables	Orbis Amadeus
ESG scores	Refinitiv Eikon
Corporate governance variables	Refinitiv Eikon
Disclosure indexes	Manually collected financial and non- financial reports





METHODOLOGY - ECONOMETRIC MODEL

 $\begin{aligned} &Lending(\log)_{b,f} \\ &= \alpha_{f(ILS)} + \beta Disclosure_index_b + \delta GHGemissions_f + \gamma Disclosure_index_b \\ &* GHGemissions_f + \theta X_{b,t-1} + \tau T_{b,t-1} + \mu Z_{f,t-1} + \epsilon_{bf} \end{aligned}$

◆Dependent variable → Lending(log) = log of the outstanding amount owed by a debtor f to bank b (t = 2019);
◆Variable of interest → Disclosure_index_b * GHGemissions_f;
◆GHG variables → tonnes of GHG equivalent divided by the company's revenues (Scope 1, 2 and 3);
◆Controls: X → bank-level; T → corporate governance; Z → firmlevel.





METHODOLOGY – CONTROLS

Bank-specific variables

logTotass	Logarithm of total assets.
dep_tl (%)	Deposit to total liability ratio.
NPL_r (%)	Nonperforming loan to gross loan ratio.
ROA (%)	Net income to total asset ratio.
Cash_ta (%)	Cash and cash equivalent to total asset ratio.
Fee_opInc (%)	Fee and commission to operating income ratio.
CET1_r (%)	Common equity tier 1 to risk-weighted asset ratio.

Firm-specific variables

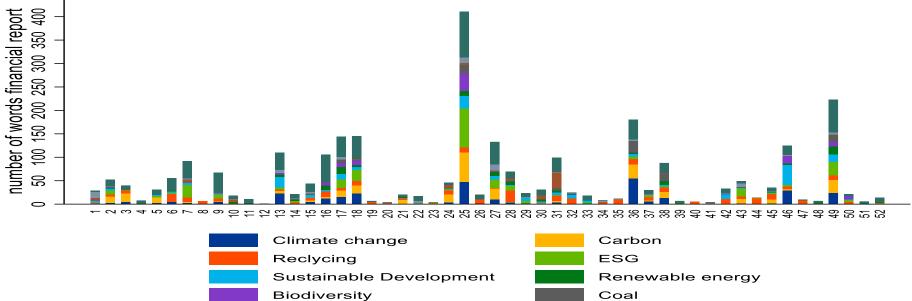
FILM-specific variables			
Firm_ta (log total assets)	Logarithm of total assets.		
Firm_cash (%)	Cash and cash equivalent to total liability ratio.		
Firm_debt (%)	Current and non-current liability to total asset ratio.		
Firm_ROA (%)	Net income to total asset ratio.		
Firm_WC (%)	Working capital to total asset ratio		
Firm_gearing (%)	Interest paid to earning before interest and tax ratio		
Bank corporate governan	ce and ESG variables		
Board_size (log)	Logarithm of the number of directors in the boardroom.		
CSRcomp (dummy)	Dummy taking the value 1 if a bank has CSR compensation in place, and 0 otherwise.		
Board_tenure (years)	Average number of years that each board member has been on board.		
Ind_board (%)	Percentage of independent board members		
ESGscore	Environmental, Social and Governance (ESG) score.		
ESGcontroversies	Yearly number of ESG-related controversies published in the media.		
Stakeholders	Dummy variable equal to 1 if a bank engaged with its stakeholders, and 0 otherwise.		





METHODOLOGY

NUMBER OF ENVIRONMENTAL WORDS IN BANK REPORTS (TOP-10)



Ecology Others







RESULTS - BASELINE MODEL

	(1)	(2)	(3)	(4)	(5)	(6)
VARIABLES	Lending	Lending	Lending	Lending	Lending	Lending
Disclosure_Index	-0.05190 (0.036)	-0.02355 (0.028)	-0.05094 (0.038)	-0.02047 (0.028)	-0.05095 (0.036)	-0.02263 (0.028)
GHGTot		0.00275*** (0.001)				
GHG12				0.04780* (0.028)		
GHG3	× (* _	1		, í		0.00310** (0.001)
Disclosure_Index*GHGTot	-0.00077*** (0.000)	-0.00123*** (0.000)				(,
Disclosure Index*GHG12		()	-0.01713*	-0.03027**	1	
			(0.010)	(0.014)		
Disclosure_Index*GHG3					-0.00097***	-0.00148***
A					(0.000)	(0.000)
Observations	607,445	910,895	607,445	910,895	607,445	910,895
R-squared	0.7332	0.6341	0.7332	0.6341	0.7332	0.6341
Firm FE	Yes	No	Yes	No	Yes	No
ILS FE	No	Yes	No	Yes	No	Yes
N banks	52	52	52	52	52	52
N firms	236478	539928	236478	539928	236478	539928





RESULTS - DISCLOSURE TONE

	(1)	(2)	(3)	(4)
VARIABLES	Lending	Lending	Lending	Lending
GHGTot	2		0.00252**	0.00257**
Disclosure Index*GHGTot	-0.00100***	-0.00092***	(0.001) -0.00166***	(0.001) -0.00153***
	(0.000)	(0.000)	(0.000)	(0.000)
Negative Tone	0.01276	(,	0.00982	(
5	(0.020)		(0.023)	
Positive Tone			0.01334	
			(0.013)	
Disclosure Index*Negative Tone	0.01280		0.01855	
	(0.016)		(0.016)	
Disclosure Index*Positive Tone		0.01334		0.00827
		(0.013)		(0.013)
Disclosure Index*GHGTot *Negative Tone	-0.00041**	1	-0.00050**	
	(0.000)		(0.000)	
Disclosure Index*GHGTot*Positive Tone		0.00046***		0.00047***
		(0.000)		(0.000)
Observations	607,445	607,445	910,895	910,895
R-squared	0.7333	0.7333	0.6342	0.6342
Firm FE	Yes	Yes	No	No
ILS FE	No	No	Yes	Yes
N banks	52	52	52	52
N firms	236478	236478	539928	539928
Bank controls	Yes	Yes	Yes	Yes
Firm controls	Absorbed	Absorbed	Yes	Yes
Corporate governance controls	Yes	Yes	Yes	Yes





RESULTS - ROBUSTNESS AND ADDITIONAL ANALYSES

Disclosure index following the "inverse document frequency approach" (Brown & Tucker, 2011);
Disclosure indexes computed by considering both financial and non-financial reports;
Analysis of the tone of sustainability reports;
Disclosure index replaced with a dummy that identifies those banks that publish a sustainability / non-financial report.





CONCLUSIONS

We investigated the relationship between bank environmental disclosure and green lending;

- We merged loan-level data with firm GHG emissions and bank disclosure indexes;
- *Our results show that, overall, we should **reject the greenwashing hypothesis** \rightarrow **signalling theory** (Spence, 1973);
- We did observe evidence of greenwashing behaviour depending on the tone adopted in the financial reports.





CONCLUSIONS

*Bank managers unaware of environmental risks and excessively optimistic \rightarrow positive tone \rightarrow greenwashing;

*Bank managers aware of environmental risks and less optimistic \rightarrow negative tone \rightarrow more transparency and actual environmentally

responsible behaviour;

◆Bank managers' attitude, as reflected in the tone of their disclosures also play a crucial role in determining greenwashing behaviour;

✤While disclosure requirements can be helpful, it is also essential to raise awareness of environmental risks and climate change to ensure that they are perceived as urgent and pressing threats by banks.





THANK YOU FOR YOUR ATTENTION!

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