

# Sustainable Deposit Framework

07/2022

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# 1. RATIONALE

Raiffeisen Bank International ("RBI" or "we") has integrated comprehensive sustainability measures into its business. The underlying principles are derived from the ideas of Friedrich Wilhelm Raiffeisen for whom social solidarity, self-help and sustainability were guidelines for economic activity. We value sustainable corporate governance and the social responsibility that goes with it. Our role in the economy is characterized by practical responsibility towards our customers, employees, shareholders and society. Sustainability and corporate responsibility are key components of our identity and corporate culture. The company strives to act responsibly, extending beyond individual measures.

We therefore commit ourselves to aligning our management structures and processes with this attitude. In the three sustainability areas of responsibility, "Responsible banker," "Fair partner" and "Engaged citizen," which are closely linked to our business activities, we endeavour to optimally apply our values and competences to fostering sustainable development both in our companies and in society.

RBI supports the development of its core regions and benefits from this success story. That this is done in a sustainable way is part of our company principles.

In 2018, RBI AG set up its green bond issue program with the aim of promoting sustainable lending in Austria and Central and Eastern Europe. RBI has established itself as a regular issuer of green bonds on the national and international capital markets and in the retail segment in Austria and Central and Eastern Europe.

RBI is a signatory of the UN Global Compact (UNGC) and shows its commitment to consistently complying with the ten UNGC principles of responsible business. In this context, global responsibility is expected of all employees and managers as well as from partners and suppliers of the RBI Group. In January 2021, RBI was the first Austrian banking group to become an official signatory of the UNEP FI Principles for Responsible Banking (PRB) – an important milestone in our sustainable orientation.

With the Sustainable Deposit Framework Raiffeisen Bank International AG aims to facilitate and support environmentally and socially sustainable economic activity and growth.

## 2. USE OF PROCEEDS

With this Sustainable Deposit Framework, RBI targets to stimulate the origination of new sustainability linked financial products across its network banks and in Head Office. RBI will use an amount equivalent to the Sustainable Deposit proceeds to finance and/or re-finance, in part or in full, new and/or existing eligible sustainability linked financial products with a positive ESG impact<sup>1</sup> within RBI's core markets.

In the meantime, to ensure investors the immediate use of the funds, RBI will start by refinancing existing eligible sustainability linked financial products, as defined below. However, RBI will strive to replace the mature sustainability linked financial products with new ones and will provide transparency on their origination timeframe in its annual Sustainable Deposit reporting.

Eligible sustainability linked financial products are any types of loan, leasing instruments and/or contingent facilities (such as bonding lines, guarantee lines or letters of credit) which incentivises the borrower's achievement of ambitious, predetermined sustainability performance objectives. Eligible sustainability linked financial products also include investments in bonds that are in line with ICMA Sustainability Linked Bond Principles.

The borrower's sustainability performance is measured using predefined sustainability performance targets (SPTs), as measured by predefined key performance indicators (KPIs), which may comprise or include external ratings and/or equivalent metrics, and which measure improvements in the borrower's sustainability profile. The use of proceeds in relation to a sustainability-linked loan is not a determinant in its categorisation.

The KPI should be of high strategic significance to the borrower's current and/or future operations. The KPIs should be measurable and quantifiable, material to the borrower's core sustainability and business strategy and address relevant and core environmental, social and/or governance (ESG) challenges of the industry sector.<sup>2</sup> It is important to the success of this instrument to avoid the proliferation of KPIs that are not credible. Thus, it is important that KPIs are ambitious in the sense of representing a material improvement, are regularly monitored and, where possible compared to a benchmark or an external reference.

The SPTs are set in good faith and are consistent with the borrower's overall sustainability strategy, determined on a predefined timeline, set before or concurrently with origination of the loan. Disclosures on target setting make clear reference to, where relevant, the verified baseline or science-based reference point selected for improvement of KPIs as well as rationale for that baseline or reference point to be used (including date or/and period). Disclosures on target setting make clear reference to where relevant, in what situations recalculations or pro-forma adjustments of baselines will take place and are referred to any other any other key

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<sup>1</sup> For detailed description of reporting of ESG impact of underlying transactions please refer to chapter 6.

<sup>2</sup> [LMA SLLP](#), 2022.

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factors beyond the borrower's direct control that may affect the achievement of the SPTs. Post-signing, in case of any material change to parameter/ KPI methodology/SPT(s) calibration, borrowers are encouraged to ask external reviewers to assess any of these changes. As transparency is important for ESG washing prevention, borrowers are encouraged to publicly report information relating to their SPTs and this information will often be included in a borrower's integrated annual report or sustainability report. RBI recommends borrowers that the verification of the performance against the SPTs is made publicly available where appropriate.

For every KPI linked financial product RBI uses one of three below-listed options of economic incentive scheme that is tailored-made to financial customer preference:

### Option 1: All or nothing (large neutral zone)

<b>KPIs reached</b>	<b>Margin Adjustment in basis points p.a.</b>
all KPIs reached	- [●] (the "Sustainability Discount")
1 or x KPIs reached (but not all)	0 bps
0 or no Sustainability Compliance Certificate received by Lender	+ [●] (the "Sustainability Premium")

### Option 2: Balanced Approach (the margin adjustment balances itself out)

<b>SPT Target Score applicable to each KPI</b>	<b>Margin Adjustment for each KPI in basis points p.a.</b>
Equal to or better than the relevant Target Score	-[●] (Sustainability Discount)
Worse than the relevant Target Score	+ [●] (Sustainability Premium)

### Option 3: Dependent Margin Adjustment Approach

<b>Number of KPIs that are complied with/satisfied out of the [three (3)] KPIs</b>	<b>Margin Adjustment in basis points p.a.</b>
Zero (0)	+ [●] (Sustainability Premium)

<b>Number of KPIs that are complied with/satisfied out of the [three (3)] KPIs</b>	<b>Margin Adjustment in basis points p.a.</b>
One (1)	+ [●] (Sustainability Premium)
Two (2)	- [●] (Sustainability Discount)
Three (3)	- [●] (Sustainability Discount)

Eligible sustainability linked financial products are categorized in the table below.

*Table 1: Overview of the Eligible Categories for sustainability linked financial products.*

<b>Eligible Category</b>	<b>Eligibility Criteria</b>
<b>ESG KPI linked financial products</b>	<ul style="list-style-type: none"> <li>• <u>KPIs and SPTs</u> (defined<sup>3</sup> by the borrower in line with their sustainability and business strategy) should be determined and set between the borrower and lender group for each transaction and defined within the corresponding loan agreement.</li> <li>• SPTs must demonstrate an improvement over time compared to recent performance levels. It is preferred to have external benchmarks (peers and reference to science or international targets such as the Paris Agreement on Climate Change or UN Sustainable Development Goals) for setting the levels of the SPTs. It is preferred to set annual SPTs over the whole tenor of the loan.</li> <li>• Borrowers should, where possible and at least once per annum, provide the lenders participating in the loan with up-to-date information sufficient to allow them to monitor the performance of the SPTs. The scope and frequency of the reporting should be defined within the corresponding loan agreement.</li> <li>• Borrowers must obtain independent and external verification of the borrower's performance level against each SPT for each KPI (for example, limited or reasonable assurance or audit by a qualified external reviewer with relevant expertise, such as an auditor, environmental consultant and/or independent ratings agency), at least once a year.</li> <li>• Practical examples of KPIs for RBI Business sectors can be found in the Annex. The references of exemplary KPIs are included.</li> </ul>
<b>EU Taxonomy linked financial products</b>	<ul style="list-style-type: none"> <li>• Sustainability linked financial products should leverage the Taxonomy Technical Screening Criteria (TSC) as defined in the Delegated Acts and the % of company's turnover of taxonomy. This would allow the activities of a company to reach/ overreach a level of compliance in line with the Taxonomy substantial contribution criteria.</li> </ul>

<sup>3</sup> A clear definition of the KPI(s) and SPT(s) should be provided and should include the applicable scope or parameters, as well as the calculation methodology, a definition of a baseline and be benchmarked against an industry standard where feasible.

	<ul style="list-style-type: none"> <li>• Should be determined and set between the borrower and lender group for each transaction and defined within the corresponding loan agreement.</li> <li>• SPTs must demonstrate an improvement over time compared to recent performance levels. It is preferred to have external benchmarks (peers and reference to science or international targets such as the Paris Agreement on Climate Change or UN Sustainable Development Goals) for setting the levels of the SPTs.</li> <li>• Borrowers should, where possible and at least once per annum, provide the lenders participating in the loan with up-to-date information sufficient to allow them to monitor the performance of the SPTs. The scope and frequency of the reporting should be defined within the corresponding loan agreement.</li> <li>• Borrowers must obtain independent and external verification of the borrower's performance level against each SPT for each KPI (for example, limited or reasonable assurance or audit by a qualified external reviewer with relevant expertise, such as an auditor, environmental consultant and/or independent ratings agency), at least once a year.</li> </ul>
<b>ESG Rating linked financial products</b>	<ul style="list-style-type: none"> <li>• <u>ESG Ratings</u><sup>4</sup> should be determined and set between the borrower and lender group for each transaction.</li> <li>• SPTs must demonstrate an improvement over time compared to recent performance levels. It is preferred to have external benchmarks (peers) for setting the levels of the SPTs.</li> <li>• Borrowers should, where possible and at least once per annum, provide the lenders participating in the loan with up-to-date information sufficient to allow them to monitor the performance of the SPTs. The scope and frequency of the reporting should be defined within the corresponding loan agreement.</li> </ul>

<sup>4</sup> SPT refer to the whole ESG rating of the ESG rating agency, not single components.

### 3. ASSET EVALUATION AND SELECTION<sup>5</sup>

#### Credit Process

All potential eligible sustainability linked financial products are subject to RBI's standard credit process in line with the normal course of business, including:

- Know-Your-Customer (KYC) procedure
- Compliance
- Credit risk analysis
- CSR relevance assessment (all financial products which pass through RBI's head office approval process)
- Sector policies (Sensitive business areas are regulated in individual sector policies, e.g. war material, nuclear power, coal, gambling)
- Code of conduct

Only financial products that have been approved through RBI's standard regular credit process can be considered for Sustainable Deposit eligibility.

#### Exclusions

RBI will not allocate Sustainable Deposit proceeds to finance and/or re-finance sustainability linked financial products for companies operating in the following sectors:

- Defence and Weapons
- Nuclear Energy
- Fossil Fuel Energy
- Mining
- Alcohol
- Tobacco
- Gambling

#### Identification and evaluation of eligible sustainability linked financial products

The local business units identify the potential eligible sustainability linked financial products.

Eligible sustainability linked financial products are sourced from the various eligible sectors and result from the application of the eligibility criteria, under the responsibility of the Sustainable Deposit Committee ("SDC"). The SDC is part of the RBI Group Asset-Liability Committee and represents an extension of its management team. It is comprised of extended management

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<sup>5</sup> Russia/ Belarus/ Ukraine (Donbas, South-east region): due to the geopolitical situation related transactions are currently out of scope of the Framework.



and expert team of Corporate Finance, Group Corporate Credit Management, Group Treasury, Group Sustainability Management and Group Compliance, Group Investor Relation.

The SDC is responsible for:

- The review of the applications from local business units identifying potential eligible sustainability linked financial products,
- Replacing transactions that no longer meet the eligibility criteria
- Approving the annual Allocation and Impact Report

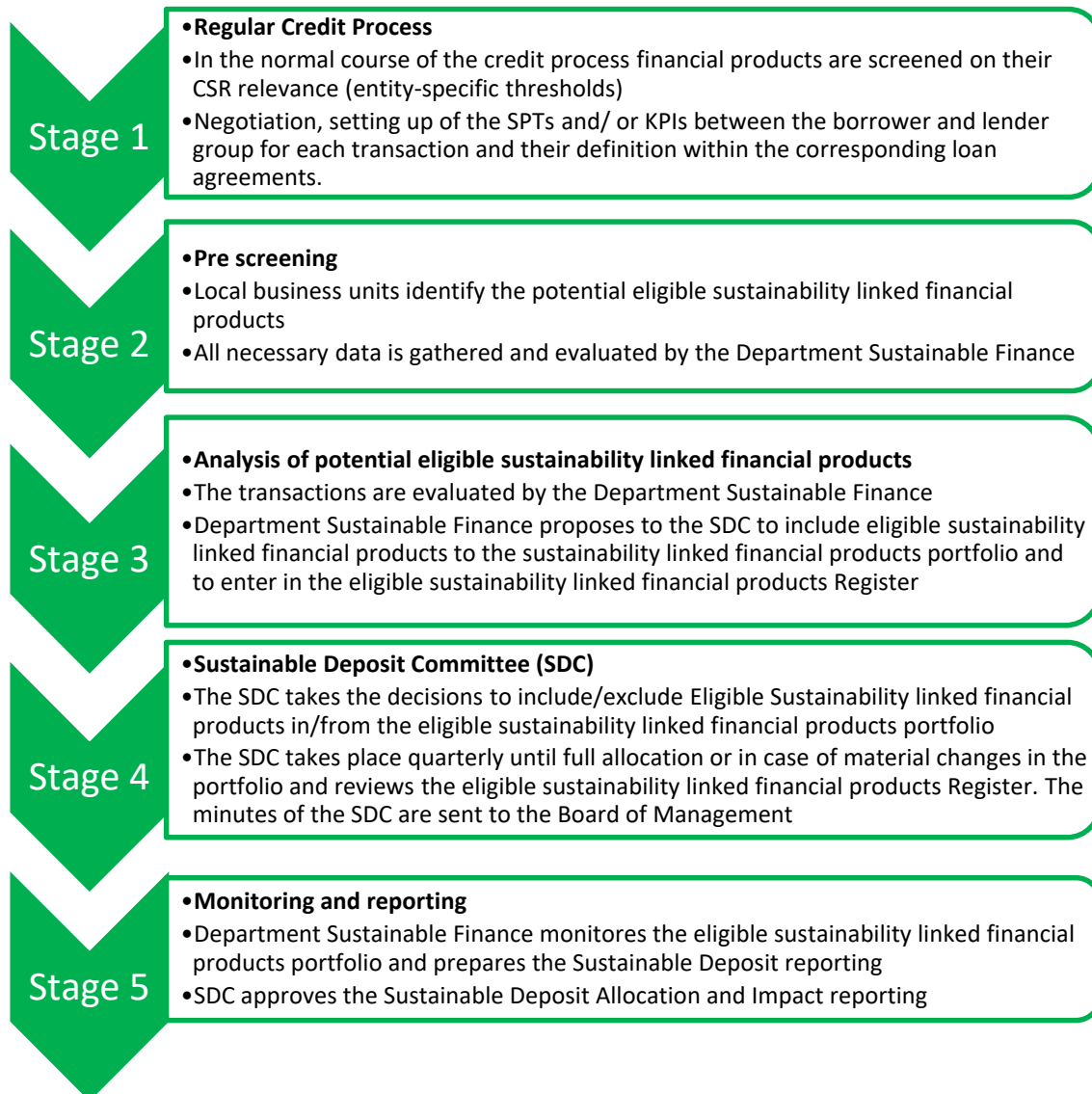
Department Sustainable Finance is in charge of collecting and monitoring all data for the Sustainable Deposit evaluation and selection process as well as for the management of the eligible portfolio. Selection process shall be documented with the view to demonstrate to an independent auditor funded financial products meet the Eligibility Criteria listed in Table 1.

Department Sustainable Finance evaluates eligible sustainability-linked transactions regarding the following points:

- Adherence of the underlying structural components to the [LMA - Sustainability Linked Loan Principles](#) and existing market standards, in case of a loan transaction,
- Adherence of the structural components to market standards, in case of a product other than a bond or loan transaction,
- Check of the ambitiousness, meaningfulness and relevance of the KPIs and related SPTs in case of a KPI-linked transaction,
- Existence of the Positive Second Party Opinion (SPO) from a reputable provider, if deemed necessary in line with market standards
- Existence of the ESG Rating from a reputable provider in case of an ESG-Rating-linked transaction, and
- The calibration of the target levels of the ESG Rating(s) are set according to market practice and do not induce greenwashing allegations in case of an ESG-Rating-linked transaction.

The financial products are assessed within the several stages' selection process described in the table below:

Table 2: Selection process of eligible sustainability linked financial products.



## 4. MANAGEMENT OF PROCEEDS

An amount equivalent to the net proceeds of any RBI Sustainable Deposits will be managed by the Sustainable Finance Department of RBI on a portfolio basis. As long as RBI's Sustainable Deposits are active, RBI will strive to maintain a volume of eligible sustainability linked financial products in the eligible sustainability linked financial products Portfolio at least equal to the proceeds of the Sustainable Deposits.

All eligible sustainability linked financial products to be included in the eligible sustainability linked financial products portfolio are entered in RBI's Sustainable Deposit Register. It assures that the eligible sustainability linked financial products are not externally refinanced.

On an annually basis RBI will check the eligibility and availability of the eligible sustainability linked financial products in the Sustainable Deposit Register. RBI will strive to substitute any redeemed or maturing eligible sustainability linked financial products with other eligible sustainability linked financial products and/or if any such financial products cease to be eligible, as soon as practicable once an appropriate substitution option has been identified.

Pending the allocation or reallocation, as the case might be, of an amount equivalent to the net proceeds of RBI Sustainable Deposits to the eligible sustainability linked financial products, RBI will invest the balance of the net proceeds within the treasury of the group, in money market instruments, cash and/or cash equivalents instruments.

## 5. REPORTING

### **Sustainable Deposits Allocation and Impact Report**

RBI has the ambition to publish the annual Sustainable Deposits Allocation and Impact report on the use of proceeds from Sustainable Deposits outstanding under this framework, including a description of its eligible sustainability linked financial products portfolio. Reporting will be provided on an annual basis until full allocation, and thereafter if there are any material changes to the Eligible sustainability linked financial products portfolio, as long as RBI's Sustainable Deposits are active.

RBI is expected to disclose the amount of the Sustainable Deposit proceeds outstanding, the total amount of the proceeds allocated to eligible sustainability linked financial products and the unallocated amount, if any. It shall also disclose, on an aggregated level, a description of the eligible sustainability linked financial products portfolio, including details such as:

- Sustainable Deposit proceeds allocated per country / region;
- Total amount and number of eligible sustainability linked financial products;
- Eligible sustainability linked financial products breakdown by three eligible categories;
- Origination timeframe, including the average age of eligible sustainability linked financial products; and
- Status of SPTs achievement (overachieving, achieving, underachieving) for eligible sustainability linked financial products

Furthermore, when relevant and feasible, RBI will report on several Performance Indicators (PIs) in aggregate at the eligible category level. The following table below summarizes examples of Performance Indicators that could be disclosed subject to their materiality and ambitiousness in sectors/ countries within the scope.

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Table 3: Examples of possible Performance Indicators per eligible category.

Eligible Category	Examples of Performance Indicators
ESG KPI linked financial products	<ul style="list-style-type: none"> <li>• GHG emission reduction (tCO<sub>2</sub>e p.a.)</li> <li>• Annual energy savings (MWh p.a.)</li> <li>• Employee engagement, diversity and inclusion:               <ul style="list-style-type: none"> <li>○ % of female employees in the management teams and the boards of the Borrower's portfolio companies' at year end</li> <li>○ % of employees working in a country where the business has been certified a "Great Place to Work<sup>®</sup>" or received equivalent certification</li> </ul> </li> <li>• Employee health and safety improvement               <ul style="list-style-type: none"> <li>○ Process Safety Event Level (Tier 1, 2, 3, 4)</li> <li>○ Accident Rate (LTAR, TRIFR)</li> </ul> </li> </ul>
EU Taxonomy linked financial products	EU Taxonomy TSC related KPIs, e.g.: <ul style="list-style-type: none"> <li>• Improvement level of the GHG emission (tCO<sub>2</sub>e p.a.)</li> </ul>
ESG Rating linked financial products	<ul style="list-style-type: none"> <li>• Split based on the appointed external rating provider</li> <li>• Rating status quo distribution based on the performance within industry</li> </ul>

The impact assessment provided is subject to the availability of information and baseline data. This may also be subject to confidentiality agreements, competitive considerations, and other such factors, which may limit the scope of impact reporting. Appendix A in the applicable version of the [LMA SLLPs](#) sets out additional common examples of the impact indicators which are meant to be indicative only and will not necessarily be appropriate for every deal.

Each RBI Sustainable Deposits Allocation and Impact report will be reviewed and approved by the Sustainable Deposit Committee. This information will be made available on RBI's website<sup>6</sup>.

<sup>6</sup> <https://www.rbinternational.com/en/investors.html>.

## 6. EXTERNAL REVIEW

### Second Opinion

RBI has mandated Carbon Trust company, a provider of environmental social and governance (ESG) research and analysis, to provide a second party opinion on RBI's Sustainable Deposit Framework. The Second Opinion can be found at [www.rbinternational.com](http://www.rbinternational.com).

### External Audit

RBI's auditor will verify on an annual basis that RBI duly applied the defined procedures of the defined procedures of approval of the Sustainable Deposit Committee and that all products of the Eligible sustainability linked financial products Portfolio are already disbursed and entered in RBI's Sustainable Deposit Register.

## 7. DISCLAIMER

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## ANNEX

Below listed KPIs are exemplary and can be used self-standing or in combination, depending on the specific customer sustainability profile and the desired sustainability achievement targets

Industry	Exemplary KPIs	References
<b>Real Estate</b>	Scope 1, 2, 3 GHG emissions reduction (e.g., in carbon intensity per m <sup>2</sup> or absolute)	SBTi
	Percentage of certified sustainable Gross Leasable Area	SASB, Green building certifications
<b>Oil &amp; Gas</b>	Scope 1, 2 and 3 GHG emissions reduction (absolute or intensity)	TPI, SASB
	Product-related scope 3 GHG emissions reduction	TPI, SASB
	Occupational accident/incident rate including employees, temporary workers and sub-contractors (frequency rate, lost time injury frequency rate, total recordable incident rate)	SASB, Total recordable injury frequency (TRIF), Lost-time incident rate (LTIR)
<b>Manufacturing</b>	Scope 1, 2 and 3 GHG emissions reduction (absolute or intensity)	SBTi, TPI
	Occupational accident/incident rate including employees, temporary workers and sub-contractors (frequency rate, lost time injury frequency rate, total recordable incident rate)	Total recordable injury frequency (TRIF), Lost-time incident rate (LTIR)
	Proportion of raw materials sourced which are bio-based/renewable, recycled or have relevant eco-certifications and recyclability characteristics	ESG Rating agencies, Ellen MacArthur Foundation
<b>Automotive/ Automobile</b>	Scope 1, 2 and 3 GHG emissions reduction (in carbon intensity per vehicle produced, vehicle sold, vehicle kilometer or absolute)	SBTi, TPI, SASB
	% of zero emission vehicles or low-carbon vehicles (hybrid or plug-in hybrid vehicles) sold	SASB
	Occupational accident/incident rate including employees, temporary workers and sub-contractors (frequency rate, lost time injury frequency rate, total recordable incident rate)	SASB, Total recordable injury frequency (TRIF), Lost-time incident rate (LTIR)
<b>Telecommunication</b>	Scope 1, 2 and 3 GHG emissions (absolute or intensity)	SBTi, SASB
	Power usage effectiveness (PUE)	SASB, EU Report 2019
	Employee engagement	ESG Rating agencies
<b>Healthcare</b>	Access to healthcare for patients in low- and middle-income countries (LICs, LMICs)	Access to Medicine Foundation, WHO Essential Medicines List, WHO Global Monitoring Framework



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	Scope 1, 2 and 3 GHG emissions reduction (absolute or intensity)	SBTi, SASB
<b>Utilities</b>	Scope 1, 2 (and/or scope 3 when relevant) GHG emissions reduction (absolute or intensity e.g., in tCO <sub>2</sub> /MWh)	SBTi, TPI
	Transmission and distribution lines losses	SASB
<b>Materials</b>	Scope 1, 2 and 3 GHG emissions reduction (absolute or intensity)	SBTi, TPI, SASB
	Occupational accident/incident rate including employees, temporary workers and sub-contractors (frequency rate, lost time injury frequency rate, total recordable incident rate)	SASB Total recordable injury frequency (TRIF), Lost-time incident rate (LTIR)
	% of reduction of (non-)hazardous waste generated	SASB

### KPIs' reference sources

<b>SASB</b>	<a href="https://www.sasb.org/">https://www.sasb.org/</a>
<b>ICMA illustrative KPI registry</b>	link to be found at the bottom of following press release: <a href="https://www.icmagroup.org/News/news-in-brief/the-principles-announce-key-publications-and-resources-in-support-of-market-transparency-and-development/">https://www.icmagroup.org/News/news-in-brief/the-principles-announce-key-publications-and-resources-in-support-of-market-transparency-and-development/</a>
<b>SBTi</b>	<a href="https://sciencebasedtargets.org/">https://sciencebasedtargets.org/</a>
<b>TPI</b>	<a href="https://transitionpathwayinitiative.org/">https://transitionpathwayinitiative.org/</a>
<b>Ellen MacArthur Foundation</b>	<a href="https://ellenmacarthurfoundation.org/global-commitment/signatory-reports">https://ellenmacarthurfoundation.org/global-commitment/signatory-reports</a>
<b>ESG Rating Agencies - Key issues</b>	non public, need access to ESG Rating agencies
<b>EU - Ecodesign Requirements for servers (2019)</b>	<a href="https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52019SC0106&amp;from=EN">https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52019SC0106&amp;from=EN</a>
<b>WHO Essential Medicines List</b>	<a href="https://www.who.int/groups/expert-committee-on-selection-and-use-of-essential-medicines/essential-medicines-lists">https://www.who.int/groups/expert-committee-on-selection-and-use-of-essential-medicines/essential-medicines-lists</a>
<b>WHO Global Monitoring Framework</b>	<a href="https://www.who.int/teams/ncds/surveillance/monitoring-capacity/gmf#:~:text=Following%20the%20Political%20Declaration%20on,cancer%2C%20chronic%20lung%20diseases%20and">https://www.who.int/teams/ncds/surveillance/monitoring-capacity/gmf#:~:text=Following%20the%20Political%20Declaration%20on,cancer%2C%20chronic%20lung%20diseases%20and</a>
<b>Access to Medicine Foundation</b>	<a href="https://accesstomedicinefoundation.org/">https://accesstomedicinefoundation.org/</a>