TITLE: IMPROVING MECHANISMS FOR FINANCING ESG-BASED INVESTMENTS IN THE BANKING SECTOR OF UZBEKISTAN

Rakhmatullaeva Sevinch Doniyor kizi
Master's student, Faculty of Finance,
Banking and Finance Academy of the Republic of Uzbekistan

Abstract:

In the context of global economic transformation, the integration of Environmental, Social, and Governance (ESG) principles has emerged as a fundamental requirement for financial stability and international competitiveness. This research examines the structural and functional mechanisms of ESG-based investment financing within the commercial banking sector of Uzbekistan. As the nation intensifies its transition toward a "Green Economy," financial institutions are tasked with aligning their lending portfolios with sustainable development goals. Through a comprehensive analysis of current regulatory frameworks and the adoption of "Green" banking products, this study evaluates the readiness of the domestic banking sector to implement international sustainability standards. The research identifies critical bottlenecks, such as the lack of a comprehensive national ESG taxonomy, insufficient technical expertise in environmental risk assessment, and limited domestic demand for sustainable financial instruments. The findings propose a systemic model for enhancing ESG financing, emphasizing the development of green bond frameworks, the institutionalization of ESG risk management systems, and the implementation of standardized sustainability reporting. Ultimately, this paper provides strategic recommendations for the Central Bank and commercial lenders to foster a more resilient, transparent, and climate-aligned financial ecosystem in Uzbekistan.

Keywords: ESG Integration; Sustainable Finance; Uzbekistan Banking Sector; Green Economy; Environmental Risk Management; Investment Mechanisms; Corporate Governance.

Introduction

The global financial landscape is currently undergoing a fundamental transformation, where the traditional pursuit of profit is being integrated with the imperatives of environmental sustainability and social equity. Environmental, Social, and Governance (ESG) principles have transitioned from a niche "ethical" investment strategy to a core framework for risk management and capital allocation worldwide. For emerging economies, particularly the Republic of Uzbekistan, the adoption of ESGbased financing is no longer optional but a strategic necessity to secure long-term economic resilience and attract high-quality foreign direct investment (FDI).

In recent years, Uzbekistan has demonstrated a significant commitment to modernizing its economic architecture. Under the **"Strategy for Transition to a Green Economy for the Period 2019–2030"** and the more recent **"Uzbekistan–2030" Strategy**, the government has set ambitious targets for decarbonization, energy efficiency, and social inclusion (AIIB 2025). As the primary intermediaries of capital, commercial banks in Uzbekistan stand at the forefront of this transition. By the start of 2026, the Central Bank of the Republic of Uzbekistan (CBU) has intensified its focus on macroprudential stability, increasingly recognizing climate-related risks as a potential threat to the national financial system (Central Bank of Uzbekistan 2025).

Despite these strategic directions, the practical implementation of ESG financing mechanisms within the domestic banking sector remains in its early stages. While several leading financial institutions

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have begun establishing "Sustainable Finance" departments and issuing ESG reports, the broader sector faces systemic challenges. These include a lack of a unified national green taxonomy, insufficient data for environmental risk scoring, and a reliance on external funding from international financial institutions (IFIs) like the EBRD and ADB rather than domestic ESG capital markets (GGGI 2025).

This research aims to analyze the current mechanisms for financing ESG-based investments in Uzbekistan's banking sector and propose methods for their improvement. By evaluating the shift from traditional lending to sustainability-linked financial products, the paper seeks to provide a roadmap for commercial banks to enhance their ESG integration. The study is particularly relevant in 2026 as the CBU prepares to implement new roadmap requirements for 2026–2030, which are expected to include more rigorous sustainability disclosure and risk management standards for all credit institutions.

Empirical Analysis of ESG Financing Mechanisms in the Uzbekistan

Banking Sector

The current architecture of ESG-based financing in Uzbekistan is fundamentally characterized by a transitional phase, moving from rudimentary environmental safeguards toward a more integrated sustainable investment framework. At present, the primary mechanism through which ESG principles are operationalized is the utilization of targeted credit lines provided by international financial institutions (IFIs). Since local commercial banks often lack the long-term liquidity required for high-impact "green" projects, they function as intermediaries for funds from organizations such as the European Bank for Reconstruction and Development (EBRD) and the Asian Development Bank (ADB). This reliance on external capital has dictated the initial standards for ESG integration, as domestic banks have been compelled to adopt the Environmental and Social Management Systems (ESMS) required by these global partners to qualify for funding.

The practical application of these mechanisms is most visible in the credit appraisal process. Historically, credit risk assessment in Uzbekistan was limited to financial solvency and collateral valuation. However, the emerging ESG mechanism has introduced a "multi-layered screening" approach. In the first stage, potential projects are subjected to a negative screening process to ensure they do not appear on exclusion lists involving environmentally hazardous activities or unethical labor practices. The second stage involves qualitative risk categorization, where projects are assigned a risk profile—low, medium, or high—based on their potential impact on carbon emissions, water usage, and community welfare. While this represents a significant advancement, the analysis suggests that this mechanism remains largely qualitative, as many banks still lack the quantitative tools to measure the precise "carbon intensity" of their loan portfolios.

Furthermore, the governance (G) aspect of the ESG triad has seen a notable shift due to recent directives from the Central Bank of Uzbekistan. As of 2025-2026, there is an increasing emphasis on transparency and non-financial disclosure. Most major commercial banks have begun transitioning their annual reporting toward Global Reporting Initiative (GRI) standards. This shift in reporting mechanisms is not merely a bureaucratic requirement; it serves as a signaling tool to international institutional investors. By disclosing their ESG performance, Uzbek banks are attempting to lower their risk premiums and secure more favorable borrowing terms on the international market. However, the effectiveness of this mechanism is currently limited by the "data gap"—a systemic shortage of verified environmental data from small and medium-sized enterprise (SME) clients, which makes it difficult for banks to verify the actual impact of their sustainable lending.

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Finally, the analysis reveals a significant "taxonomy bottleneck" within the existing financing mechanisms. Without a finalized national green taxonomy, there is a

lack of objective criteria to distinguish between "green" and "transient" investments. This ambiguity creates a risk of greenwashing, where traditional industrial loans might be misclassified as sustainable to meet internal quotas or marketing goals. Moreover, the mismatch between the short-term nature of domestic deposits and the long-term capital requirements of ESG-based infrastructure projects remains a critical structural flaw. Addressing these gaps requires a move away from passive intermediary roles toward a more proactive model of domestic ESG capital mobilization, including the issuance of local green bonds and the institutionalization of sustainability-linked interest rates.

Strategic Pathways for Optimizing ESG Financing Mechanisms

The transition from a donor-dependent model to a self-sustaining ESG financial ecosystem requires a multi-dimensional strategy involving regulatory reform, technological adoption, and market diversification. To achieve the objectives outlined in the national green economy strategy, the following optimization pathways are proposed.

The most critical requirement for the advancement of ESG financing in Uzbekistan is the formalization of a National Green Taxonomy. Currently, the lack of standardized definitions leads to inconsistencies in how commercial banks classify "sustainable" assets. A unified taxonomy would provide a clear technical roadmap for lenders, ensuring that capital is directed toward projects with verified environmental benefits. Furthermore, the Central Bank of Uzbekistan should consider integrating ESG factors into its macroprudential policy framework. By introducing differentiated reserve requirements—where banks holding a higher proportion of certified green assets benefit from lower mandatory reserves—the regulator can create a powerful financial incentive for the private banking sector to accelerate its sustainability transition.

The "data gap" currently hindering the assessment of Small and Medium Enterprises (SMEs) can be bridged through the digitalization of the credit underwriting process. It is recommended that Uzbek commercial banks invest in specialized ESGFintech modules that utilize big data and cloud-based reporting systems. Such platforms would allow for the automated collection of environmental performance metrics from borrowers, significantly reducing the administrative cost of ESG due diligence. Additionally, banks should prioritize the development of internal carbon accounting tools to measure the Scope 3 emissions of their lending portfolios. This data-driven approach would allow for more accurate risk pricing and help banks align their longterm strategies with international climate goals.

To address the systemic asset-liability mismatch, where short-term deposits are used to fund long-term green infrastructure, the banking sector must actively participate in the development of the domestic capital market. The issuance of local-currency Green Bonds and Social Bonds would provide banks with the long-term liquidity needed for large-scale projects in renewable energy and waste management. Beyond bonds, there is significant potential for the introduction of Sustainability-Linked Loans (SLLs). Unlike traditional green loans that are restricted to specific projects, SLLs allow for general corporate purposes while linking the interest rate to the borrower's achievement of predetermined ESG Key Performance Indicators (KPIs). This mechanism creates a partnership between the bank and the client, fostering a culture of continuous improvement in corporate sustainability.

Conclusion

The evolution of ESG-based financing in the Uzbekistan banking sector represents more than just a regulatory shift; it is a fundamental reconfiguration of the role of finance in national development. This

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research has demonstrated that while the initial impetus for ESG adoption was provided by international financial institutions, the future of the sector depends on the successful "localization" of these mechanisms. The analysis highlights that the transition is currently hampered by structural bottlenecks, specifically the lack of standardized taxonomies and the absence of high-quality environmental data.

However, the findings also suggest that these challenges present an opportunity for innovation. By adopting the recommended technological enhancements and regulatory incentives, Uzbekistan's banking sector can achieve a competitive advantage in the regional financial market. The shift toward ESG-based investment is not merely a defensive strategy against climate risk, but a proactive tool for economic modernization. If the proposed improvements are integrated effectively, the banking sector will serve as the primary engine for the "Uzbekistan–2030" Strategy, ensuring that the nation's economic growth is not only rapid but also resilient, inclusive, and environmentally sustainable.

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