



SASB Industry Working Groups Due Process Report

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Financials
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INTRODUCTION

SASB develops and disseminates industry-specific accounting standards for material sustainability issues for use by U.S. publicly-listed corporations and their investors, such that sustainability performance can be evaluated alongside financial performance. SASB standards identify, prioritize and describe material non-financial risks and opportunities and provide decision-useful information for the benefit of companies, investors and the public.

SASB was accredited by the American National Standards Institute (ANSI) as a national standard developer in December 2012, and follows ANSI best practices for standards development, summarized below:

- Consensus on a proposed standard by a group or “consensus body” that includes representatives from materially affected and interested parties
- Broad-based public review and comment on draft standards
- Consideration of and response to comments submitted by voting members of the relevant consensus body and by public review commenters
- Incorporation of approved changes into a draft standard
- The right to appeal by any participant that believes that due process principles were not sufficiently respected during the standards development in accordance with the ANSI-accredited procedures of the standards developer¹

SASB’S INDUSTRY WORKING GROUP OVERVIEW

SASB Industry Working Groups (IWGs) play a critical role in helping achieve SASB’s mission. IWG members are industry experts with at least five years of experience in the industry for which they are reviewing SASB Standards. They are recruited across the following interest groups: reporting entities (corporations); market participants (investors and analysts), and; public interest/intermediaries (NGOs, academics, government officials, NGOs, etc.). IWGs convene to review SASB’s evidence-based research of ESG factors that are determined to be material for their industry and related key performance indicators (KPIs). IWGs provide important feedback on these KPIs, providing additional evidence of financial impact and/or evidence of interest, as well as commenting on SASB’s forward looking adjustments on material issues.

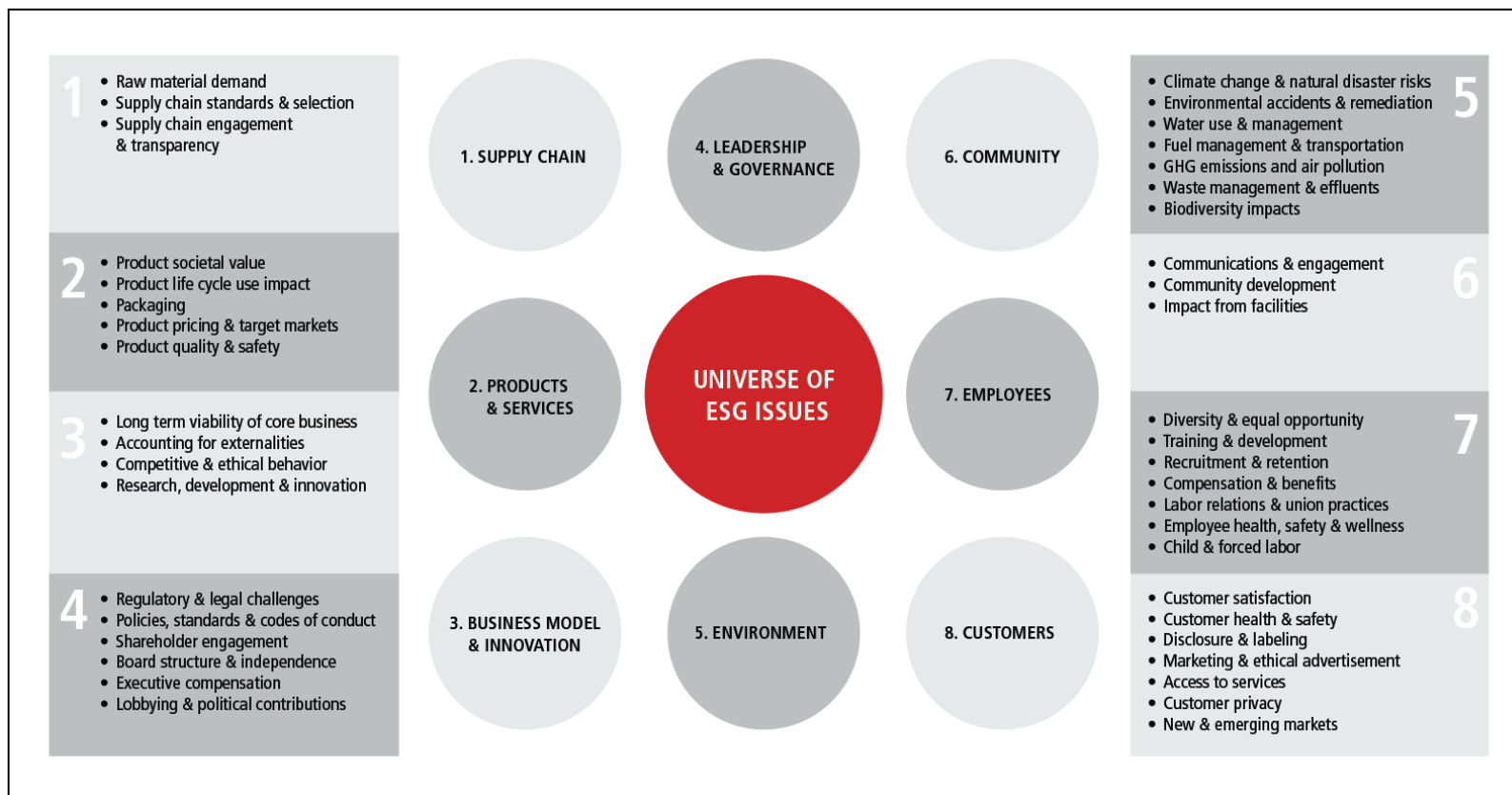
Objective & Approach

SASB Standards refine the set of Environmental, Social and Governance issues (shown in Exhibit A) into a minimum set of ESG issues that are material to each industry through evidence-based research focused on evidence of financial impact and evidence of interest. Simply stated, SASB

¹http://www.ansi.org/standards_activities/domestic_programs/overview.aspx?menuid=3

IWG objectives are to solicit technical feedback on Sustainability Accounting Standards from interest groups that will be affected by the Standards.

Exhibit A – Universe of ESG Issues Researched by SASB for Materiality



SASB’s industry expert review through its IWGs helps ensure that draft Sustainability Accounting Standards address issues that are truly material to each industry, resulting in KPIs that are: applicable; auditable; complete; cost-effective; directional; useful, and; relevant. In other words, SASB Standards are *decision-useful to investors and market participants*.

Thematic Sectors and Industry Working Group Recruiting

SASB categorizes industries into thematic sectors and industry working groups based on their resource intensity as well as their sustainability innovation potential. The system by which SASB groups industries into thematic sectors and IWGs is known as SASB's Sustainable Industry Classification System™ (SICS™). SICS™ ties back to standard classification systems, such as Bloomberg's Industry Classification and Global Industry Classification Systems, so users don't have to learn another system.

Following ANSI's principles of openness, balance, lack of dominance, coordination, harmonization, and a consideration of all views and objections, SASB convenes working groups comprised of industry experts to review the material ESG issues and related Sustainability Standards drafted by SASB's research team.

OPEN ENROLLMENT

Enrollment in IWGs is open to all qualified participants; industry experts register to join IWGs via [SASB's online registration form](#). Applicants' suitability for IWGs is screened by SASB's Stakeholder Engagement Team (SET) to ensure that they have significant experience and expertise in their fields and are actively involved in US capital markets. SET also monitors enrollment in IWGs to ensure that participation balanced across the following three interest groups:

1. Corporations (reporting entities)
2. Market Participants (investors and analysts)
3. Public Interest/Intermediaries (NGOs, academics, government officials, NGOs, others not included in groups 1 and 2 above)

ACTIVE OUTREACH

SASB also conducts active outreach to recruit IWG participants via a variety of channels to ensure that interest groups are balanced across all industries in the thematic sector covered each quarter.

TARGETED OUTREACH – PHASE I

IWG recruiting begins with broad outreach across a variety of channels roughly two-months prior to the kick-off of each working group. Ads and articles are placed through SASB media partners (including Bloomberg, Responsible Investor, and Greenbiz), as well as through channels relevant to the industries being covered that quarter.

Referrals are by far the best source for recruiting IWG members. During Phase I of targeted outreach, SET leverages SASB's Board of Directors, Advisory Council, past IWG members and subscribers to SASB's newsletter through an email blast requesting referrals to industry experts in upcoming IWGs.

SET also reaches out to professionals in the top ten publicly-traded companies in each of the industries covered in the sector (as well as analysts covering these companies). (See Appendix I for a list of companies targeted in Phase I outreach for the Financials IWGs).

When referrals are not available, contact information is obtained through publicly-available channels such as LinkedIn and Google searches. SASB also subscribes to Data.com, through which SET acquires contact information for potential IWG participants.

TARGETED OUTREACH – PHASE II

As registrants begin to populate SASB IWGs, more narrowly-focused outreach becomes necessary. This targeted approach focuses on areas in which open enrollment and Phase I Outreach results are “thin” and vulnerable to imbalance.

Targeted outreach to attract participants in specific industry AND interest group levels involves: a second approach to Board and Advisory Council members seeking referrals in the specified areas of need; highly targeted media outreach; LinkedIn, industry/trade association outreach; seeking referrals from IWG registrants.

OUTREACH AND ADVERTISING CHANNELS

Edelman, SASB's agency of record, is developing an outreach strategy, including tactics and channels, with an emphasis on sectors SASB will be covering in 2013. Recruiting for the financials working groups was well underway when Edelman came on board, but we expect their plan to yield improvement in our broad outreach approach going forward.

SASB's media partners are: Responsible Industries (RI); Sustainable Industries Journal (SIJ) and; Greenbiz. Although not an official media partner, Bloomberg Sustainability continues to be a tremendous media resource for SASB. These media partners helped publicize IWG recruiting for the financials sector through the placement of banner ads on their sites. They also provide coverage of general developments at SASB from time to time. GreenBiz now features a quarterly article on SASB, recapping the sector just covered, and announcing the sector for which we are recruiting. The Corporate EcoForum, US SIF, UNPRI and National Investor Relations Institute (NIRI) mentioned SASB's recruiting for the Financials sector in webinars and online newsletters.

IWG Process, Tools and Materials

IWG participants provide vital feedback on proposed SASB Standards during a one-month period of structured engagement. During this time, IWG participants review SASB Industry Briefs for their industry and are encouraged to contribute evidence supporting or refuting the financial impact of and/or interest in material issues and related KPIs drafted by SASB.

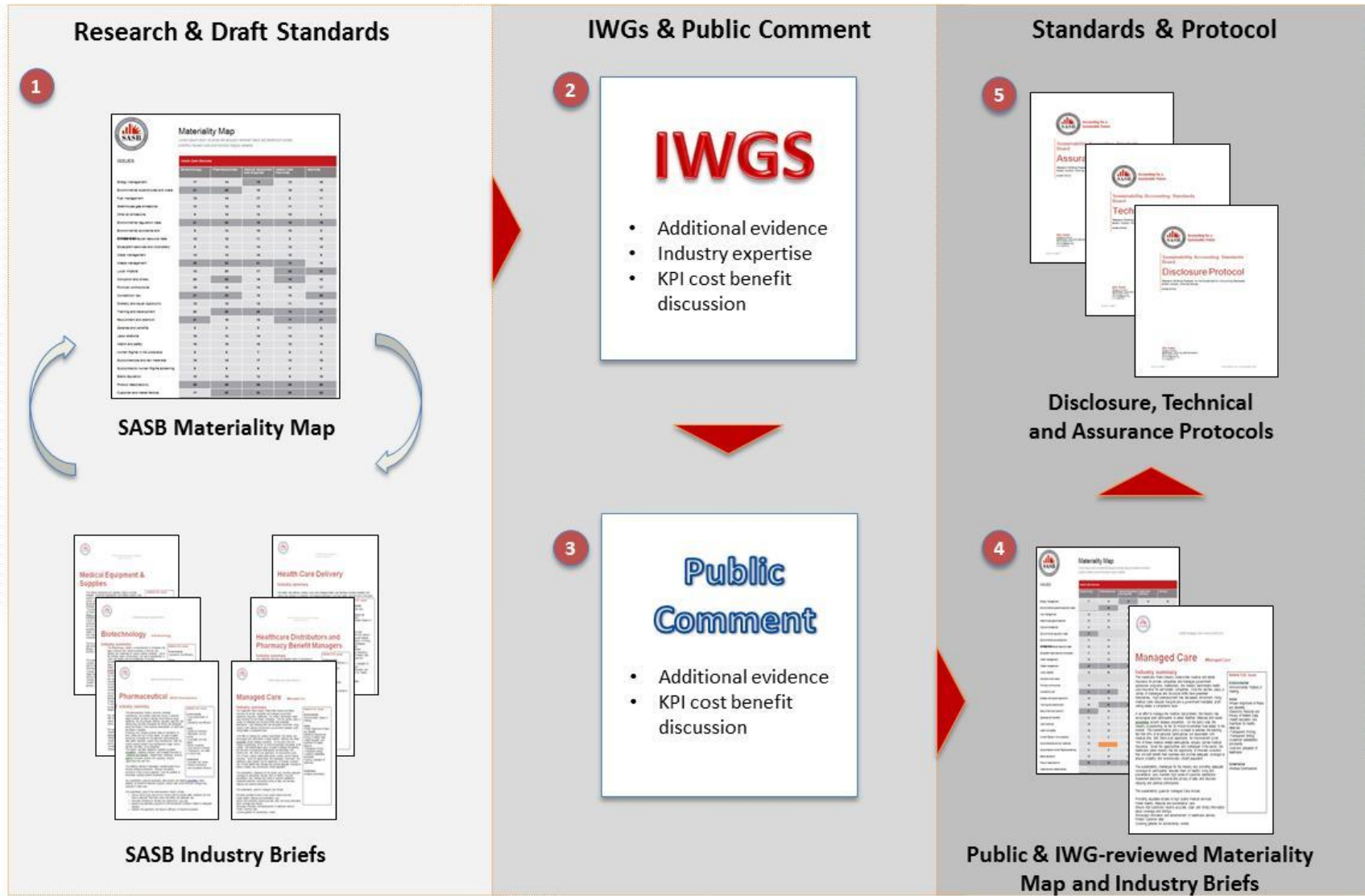
IWGs commence with introductory webinars through which IWG participants become familiar with SASB and the IWG work flow (shown in Exhibit B). Participants are provided with the following tools and materials through which to conduct their work:

- A SASB Industry Brief for their industry
- Access to a LinkedIn Group for their sector, through which industry experts are able to share evidence related to issues material to their industry and can communicate through an open forum with other group members
- An electronic survey designed to capture detailed feedback on SASB Standards

Minimum levels of participation in SASB's IWGs require that participants 1) read the SASB Industry Brief and suggested KPIs for the industry in which they are enrolled and 2) complete the online survey providing feedback on the Brief and KPIs. Participation in online discussions via IWG fora and attendance of webinars and follow up conferences is optional.

Survey results, as well as comments made via LinkedIn and through email, are compiled and submitted to SASB'S research team for review for consideration as the Standards are finalized. All IWG communication with SASB is retained by SASB to document the Standards development process. IWG members may also suggest other issues for which they have evidence of materiality of issues they believe should be included in SASB's Standards.

Exhibit B – SASB’s Work Flow, One Sector per Quarter



Industry Working Groups for the Financials Sector

SASB’s working groups (IWGs) covering the financials sector were convened for a period of structured engagement from February 5th through March 14th, 2013². The groups were structured as follows:

| Working Group Roll-ups | Industry Groups |
|------------------------------|---------------------------------------|
| Banking & Investment Banking | Commercial Banks |
| | Investment Banking & Brokerage |
| | Asset Management & Custody Activities |
| Specialty Finance | Consumer Finance |
| | Mortgage Finance |
| | Security & Commodity Exchanges |
| Insurance | Insurance |

FINANCIALS IWG COMPOSITION

RECRUITING – PLANNED VS. ACTUAL

Minimum target levels for participation in the financials working groups were set at twelve experts per interest group per industry, for a total target of 252 survey responses for the sector. These targets were more than double the targets set for health care, of 5 experts per interest group per industry.

In total, 302 survey commitments were received for SASB financials working groups – 120% of the targeted total. 191 individuals registered to participate in the financials working groups – more than double the number of individuals (90) who initially joined SASB health care working groups. As was the case with the health care working groups, many registrants committed to complete more than one survey in the financials working groups. Exhibit C shows SASB’s planned vs. actual IWG recruiting results by industry and interest group.

² Periods of Structured Engagement for SASB Industry Working Groups generally span a 1-month period. Financials IWGs were extended to encourage participation after the initial closing date of February 28th yielded only 200 completed out of 302 commitments to surveys.

Exhibit C – Financials IWG Recruiting – Planned vs. Actual

Industry Working Group Overview: Planned, Committed and Completed Surveys

| | Market Participants | Corporations | Public Interest/ Intermediaries | Total | |
|------------------------------|---|--------------|---------------------------------|-------|-----|
| Banking & Investment Banking | Commercial Banks | | | | |
| | Planned | 12 | 12 | 12 | 36 |
| | Committed | 22 | 17 | 25 | 64 |
| | Completed | 22 | 17 | 14 | 53 |
| | Investment Banking & Brokerage | | | | |
| | Planned | 12 | 12 | 12 | 36 |
| | Committed | 37 | 15 | 18 | 70 |
| | Completed | 31 | 7 | 9 | 47 |
| | Asset Management & Custody Activities | | | | |
| | Planned | 12 | 12 | 12 | 36 |
| | Committed | 31 | 14 | 26 | 71 |
| | Completed | 32 | 12 | 10 | 54 |
| | TOTAL Banking & Investment Banking IWG | | | | |
| | Planned | 36 | 36 | 36 | 108 |
| | Committed | 90 | 46 | 69 | 205 |
| Completed | 85 | 36 | 33 | 154 | |
| Specialty Finance | Consumer Finance | | | | |
| | Planned | 12 | 12 | 12 | 36 |
| | Committed | 7 | 9 | 5 | 21 |
| | Completed | 7 | 5 | 2 | 14 |
| | Mortgage Finance | | | | |
| | Planned | 12 | 12 | 12 | 36 |
| | Committed | 6 | 9 | 9 | 24 |
| | Completed | 5 | 9 | 5 | 19 |
| | Securities & Commodity Exchanges | | | | |
| | Planned | 12 | 12 | 12 | 36 |
| | Committed | 14 | 8 | 2 | 24 |
| | Completed | 9 | 6 | 1 | 16 |
| | TOTAL Specialty Finance IWG | | | | |
| | Planned | 36 | 36 | 36 | 108 |
| | Committed | 27 | 26 | 16 | 69 |
| Completed | 21 | 20 | 8 | 49 | |
| Insurance | Insurance | | | | |
| | Planned | 12 | 12 | 12 | 36 |
| | Committed | 7 | 7 | 14 | 28 |
| | Completed | 5 | 9 | 8 | 22 |
| | TOTAL Insurance IWG | | | | |
| | Planned | 12 | 12 | 12 | 36 |
| | Completed | 5 | 9 | 8 | 22 |
| Grand Total | GRAND TOTALS | | | | |
| | Planned | 84 | 84 | 84 | 252 |
| | Committed | 124 | 79 | 99 | 302 |
| | Completed | 111 | 65 | 49 | 225 |

SASB Financials IWG members included industry expertise from well-respected entities including:

- Accountability
- Aegon
- ANZ Bank
- Bank of America
- Bank Southern
- BlackRock
- BNY Mellon
- Bunge
- Calvert Investments
- Ceres
- Chicago Title
- Citi Group
- CRD Analytics
- Crowe Horwath LLP
- Deloitte
- Deutsche Bank
- Discover Financial Services
- Domini Securities
- Erie Insurance
- Ernst & Young
- ESG Analytics
- First Affirmative Financial
- Fund Balance
- Georgetown University
- Glenwood Capital
- Global ESG Regulatory Academy
- Harrington Investments
- Hermes Investment Management
- Heron Foundation
- ING Bank
- JP Morgan Chase
- Katovich & Kassan Law Group
- KPMG
- Kroll Bond Ratings
- Macquarie
- Manomet Center for Conservation Sciences
- MetLife Bank
- Morgan Stanley
- Morningstar
- NASDAQ OMX
- NRDC
- NYSE
- NYSSA
- Oddo Securities
- Paul Weiss
- Presidio Graduate School
- PwC
- Rainforest Action Network
- RBC
- SEIU
- Southern Bancorp
- St. Mary's College
- Standard Life
- State Street Bank
- State Street Global Research
- Sustainalytics
- TD Bank Group
- Telegraph Hill Advisory
- The Hartford
- Trillium
- Trucost
- UBS
- UNEP

For a list³ of SASB's financials industry working group participants, please refer to Appendix II.

Financials IWG Surveys

SURVEY COMPOSITION & ADMINISTRATION

Composition

Financials IWG surveys were structured to solicit feedback on the ESG issues identified by SASB as being material for your industry, and the key performance indicators (KPIs) proposed for

³ Note that some SASB Industry Experts participated in more than one group and thus responded to more than one survey. Some participants have elected to be excluded from this list.

disclosure of these issues in the Forms 10-K and 20-F. Material issues identified by SASB's research team for the financials sector are shown by industry in Exhibit D.

Surveys were dynamic; responses provided early in the surveys determined questions that follow. All Financials Industry Surveys followed the same general format:

Section 1: Material Issues

Elimination

Respondents were asked to review the material issues identified by SASB and eliminate issues they felt should not be included in the minimum set (the highest priority, most key issues). For every material issue eliminated, participants were prompted to choose and rank up to three reasons why the issue should be eliminated from the minimum set.

Importance of Disclosure

The survey also asked participants to rank the importance of disclosure of the material issues identified for their industries.

Additional Material Issues

Respondents were also given the opportunity to identify up to three issues they believed were material to their industry but that had not been included in SASB's minimum set. For every material issue suggested for inclusion, participants were prompted to provide an explanation of why the issue should be added to the minimum set. They were also prompted to upload documents as evidence to support the inclusion of the new issue and/or provide urls linking to evidence to support the inclusion of the issue.

Exhibit D – Material ESG Issues for the Financial Sector by Industry

| | Banking and Investment Banking | | | Specialized Finance | | | Insurance |
|---|--|--|--|--|---|--|--|
| E n v i r o n m e n t a l | Asset Management | Commercial Banks | Investment Banking & Brokerage | Consumer Finance | Mortgage Finance | Securities and Commodities Exchanges | Insurance |
| | | Integration of ESG factors in investment management and advisory | Integration of ESG factors in credit risk analysis | Integration of ESG factors in lending and proprietary investments | Resource efficiency | Environmental and social products and services; energy efficient mortgages | Promoting ESG disclosure of listed companies |
| | Environmental and social products and services; New market opportunities | Environmental and social products and services; New market opportunities | Environmental and social products and services; New market opportunities | Environmental products and services | Environmental Risk to mortgaged properties | Environmental and social products and services; new market opportunities | Environmental risk exposure |
| | | Resource efficiency | | | | Resource efficiency | Environmental products and services |
| S o c i a l | Talent recruitment, development and retention | Financial inclusion and capacity building | Talent recruitment, development and retention | Financial inclusion | Inclusion and capacity building | Promoting transparent, efficient capital markets and preventing information asymmetry | Financial inclusion |
| | Employee incentives and compensation | Talent recruitment, development and retention | Employee incentives and compensation | Customer privacy and security | Transparent information and fair advice for customers | | Minimization of risk and moral hazard |
| | Transparent information and fair advice for customers | Transparent information and customer responsibility Customer privacy and security | Transparent information and customer responsibility | Transparent information and fair advice for customers Responsible lending and debt prevention | Responsible Lending and debt prevention | | Plan performance Talent recruitment, development, and retention |
| G o v e r n a n c e | Legal and regulatory compliance | Legal and regulatory compliance | Legal and regulatory compliance | Legal and regulatory compliance | Legal and regulatory compliance | Managing conflicts of interest in a self-regulating organization Managing business continuity and technology risk | Legal and regulatory compliance |
| | Active ownership and shareholder engagement Systemic risk management | Systemic risk management | Systemic risk management Managing Conflicts of Interest | | | | |

Section 2 – Key Performance Indicators

The second section of each industry survey sought feedback on the Key Performance Indicators (KPIs) delineated in the SASB Briefs for reporting on material ESG issues in that industry.

Participants were asked to first comment on the individual KPIs based on the following criteria:

- Relevance – Does the KPI adequately describe performance related to the material issue, or is it a proxy for performance?
- Usefulness – Does the KPI provide decision-useful information to companies? To investors?
- Cost-effectiveness – Is the data already collected by most companies or can it be collected in a timely manner and at a reasonable cost?
- Comparability – Will the data allow for peer-to-peer benchmarking within the industry?
- Auditability – Can the data underlying this KPI be verified?

Respondents were provided an opportunity to discuss the KPIs, to suggest alternatives, and to provide input on how each KPI is presented (units, aggregated and/or normalized).

Section 3 – Comments

The surveys also provided participants the opportunity to inform SASB of errors and omissions, as well as to provide general comments on the industry briefs

Administration

IWG members received links to unique, user-specific URLs to launch digital surveys hosted via FluidSurveys. URLs were associated with participant email addresses which allowed us to monitor which participants were actively engaged in the surveys and follow up with others who were not.

Compared to the Health Care working groups, administering surveys for the Financials working groups was fairly seamless. We continue to experience issues with survey invitations getting caught in junk mail folders and spam filters due to the fact that they are sent directly through FluidSurveys. We are exploring alternative means of distributing survey invitations for future working groups. We also experienced issues with participants having difficulty reading SASB Industry Briefs that were initially made available only through an online reader. For future working groups, the Stakeholder Engagement Team (SET) strongly recommends distributing SASB Industry Briefs through links to secured PDFs that are watermarked “Draft – Confidential” to make the working group process more open and convenient.

SURVEY PARTICIPATION

Financials IWG participation was strong. 75% of registered participants completed their surveys, resulting in 225 completed surveys – 90% of our targeted totals.

Despite our best efforts, we believe that we will never achieve 100% participation rates from registered participants. This is due to general over-commitment by individuals, coupled with the “free rider syndrome”. “Free riders” register to take the survey only to gain access to the industry briefs. The free rider situation became apparent when the SET noticed that industry briefs were still being downloaded well after the official close of the working groups.

SURVEY RESULTS

SASB received good consistent feedback from IWG participants. Survey results were analyzed focusing on two main topics: (1) materiality of proposed issues and (2) use of appropriate KPIs to measure them.

Exhibit E shows how working group members ranked the material issues delineated in their SASB Industry Briefs.

Exhibit E: Material Issues Ranked by Industry and Interest Group

Investment Banking & Banking

| Commercial Banks | | |
|---|---|---|
| All | Market Participants | Corporations |
| Systemic risk management | Systemic risk management | Systemic risk management |
| Legal and Regulatory Compliance | Legal and Regulatory Compliance | Legal and Regulatory Compliance |
| Integration of social and environmental factors in credit risk analysis | Integration of social and environmental factors in credit risk analysis | Integration of social and environmental factors in credit risk analysis |
| Customer privacy and security | Customer privacy and security | Customer privacy and security |
| Transparent information and customer responsibility | Transparent information and customer responsibility | Transparent information and customer responsibility |
| Financial Inclusion and Capacity Building | Talent recruitment, development and retention | Environmental products and services: New market opportunities |
| Environmental products and services: New market opportunities | Financial Inclusion and Capacity Building | Financial Inclusion and Capacity Building |
| Talent recruitment, development and retention | Resource Efficiency | Talent recruitment, development and retention |
| Resource Efficiency | Environmental products and services: New market opportunities | Resource Efficiency |

| Investment Banking and Brokerage | | |
|--|--|--|
| All | Market Participants | Corporations |
| Legal and Regulatory Compliance | Systemic risk management | Legal and Regulatory Compliance |
| Systemic risk management | Legal and Regulatory Compliance | Systemic risk management |
| Transparent information and customer responsibility | Transparent information and customer responsibility | Transparent information and customer responsibility |
| Managing conflicts of interest | Managing conflicts of interest | Managing conflicts of interest |
| Integration of social and environmental factors in services, lending and proprietary investments | Integration of social and environmental factors in services, lending and proprietary investments | Integration of social and environmental factors in services, lending and proprietary investments |
| Employee incentives and compensation | Employee incentives and compensation | Employee incentives and compensation |
| Talent recruitment, development and retention | Talent recruitment, development and retention | Talent recruitment, development and retention |
| Environmental and social products and services: New market opportunities | Environmental and social products and services: New market opportunities | Environmental and social products and services: New market opportunities |

| Asset Management & Custody Activities | | |
|---|---|---|
| All | Market Participants | Corporations |
| Legal and Regulatory Compliance | Legal and Regulatory Compliance | Transparent information and fair advice for customers |
| Systemic risk management | Systemic risk management | Integration of social and environmental factors in investment management and advisory |
| Integration of social and environmental factors in investment management and advisory | Integration of social and environmental factors in investment management and advisory | Legal and Regulatory Compliance |
| Transparent information and fair advice for customers | Transparent information and fair advice for customers | Systemic risk management |
| Employee incentives and compensation | Employee incentives and compensation | Environmental and social products and services: New market opportunities |
| Active ownership and Shareholder engagement | Talent recruitment, development and retention | Active ownership and Shareholder engagement |
| Talent recruitment, development and retention | Active ownership and Shareholder engagement | Employee incentives and compensation |
| Environmental and social products and services: New market opportunities | Environmental and social products and services: New market opportunities | Talent recruitment, development and retention |

Exhibit E, continued - Specialty Finance and Insurance

| Consumer Finance | | |
|---|---|---|
| All | Market Participants | Corporations |
| Responsible Lending and Debt Prevention | Legal and Regulatory Compliance | Responsible Lending and Debt Prevention |
| Transparent Information and Fair Advice for Customers | Transparent Information and Fair Advice for Customers | Financial Inclusion |
| Legal and Regulatory Compliance | Financial Inclusion | Customer Privacy and Security |
| Financial Inclusion | Responsible Lending and Debt Prevention | Transparent Information and Fair Advice for Customers |
| Customer Privacy and Security | Customer Privacy and Security | Legal and Regulatory Compliance |
| Resource Efficiency | Resource Efficiency | Resource Efficiency |
| Environmental Products and Services | Environmental Products and Services | Environmental Products and Services |

| Mortgage Finance | | |
|--|--|--|
| All | Market Participants | Corporations |
| Responsible Lending and Debt Prevention | Responsible Lending and Debt Prevention | Responsible Lending and Debt Prevention |
| Transparent Information and Fair Advice for Customers | Transparent Information and Fair Advice for Customers | Legal and Regulatory Compliance |
| Legal and Regulatory Compliance | Legal and Regulatory Compliance | Transparent Information and Fair Advice for Customers |
| Environmental Risk to Mortgaged Properties | Environmental Risk to Mortgaged Properties | Environmental Risk to Mortgaged Properties |
| Environmental Products and Services - Energy Efficient Mortgages | Inclusion and Capacity Building | Environmental Products and Services - Energy Efficient Mortgages |
| Inclusion and Capacity Building | Environmental Products and Services - Energy Efficient Mortgages | Inclusion and Capacity Building |

Insurance

| Security & Commodity Exchanges | | |
|---|---|---|
| All | Market Participants | Corporations |
| Promoting transparent, efficient capital markets and preventing information asymmetry | Promoting transparent, efficient capital markets and preventing information asymmetry | Promoting transparent, efficient capital markets and preventing information asymmetry |
| Managing Business Continuity and Technology Risks | Managing conflicts of interest as a Self-Regulatory Organizations | Promoting ESG disclosure of listed companies |
| Managing conflicts of interest as a Self-Regulatory Organizations | Managing Business Continuity and Technology Risks | Managing conflicts of interest as a Self-Regulatory Organizations |
| Promoting ESG disclosure of listed companies | Promoting ESG disclosure of listed companies | Resource efficiency |
| Resource efficiency | Resource efficiency | Managing Business Continuity and Technology Risks |
| Environmental and social products and services: New market opportunities | Environmental and social products and services: New market opportunities | Environmental and social products and services: New market opportunities |

| Insurance | | |
|--|--|--|
| All | Market Participants | Corporations |
| Integration of Environmental and Social Factors in Investment Management | Legal and Regulatory Compliance | Legal and Regulatory Compliance |
| Legal and Regulatory Compliance | Integration of Environmental and Social Factors in Investment Management | Minimization of Risk and Moral Hazard |
| Minimization of Risk and Moral Hazard | Financial Inclusion | Talent Recruitment, Development, and Retention |
| Environmental Risk Exposure | Plan Performance | Plan Performance |
| Talent Recruitment, Development, and Retention | Talent Recruitment, Development, and Retention | Integration of Environmental and Social Factors in Investment Management |
| Plan Performance | Minimization of Risk and Moral Hazard | Environmental Risk Exposure |
| Environmental Products and Services | Environmental Risk Exposure | Financial Inclusion |
| Financial Inclusion | Environmental Products and Services | Environmental Products and Services |

In terms of materiality, the table below shows the number of issues, by industry, which received over 75% ‘approval’ from IWG participants, the number of issues that fell below this threshold (and that are now subject to further review by the Research team) and the percentage of participants that suggested the addition of a new issue.

- Overall, 73% of our issues were ‘approved’ by IWG participants.
- The majority of suggested additions relate to traditional governance issues such as executive compensation, board structure, etc.

| | # of issues above 75% approval | # of issues that fell below 75% approval | % of participants suggesting new issues | % of participants suggesting new KPIs |
|---------------------------------------|--------------------------------|--|---|---------------------------------------|
| Commercial Banks | 6 | 3 | 44% | 11%-31% |
| Investment Banking and Brokerage | 5 | 3 | 36% | 6% - 29% |
| Asset Management & Custody Activities | 7 | 1 | 36% | 13% - 25% |
| Consumer Finance | 6 | 1 | 43% | 7% - 29% |
| Mortgage Finance | 5 | 1 | 42% | 16% - 32% |
| Security & Commodity Exchanges | 3 | 3 | 35% | 6% - 31% |
| Insurance | 6 | 2 | 32% | 14% - 32% |

In terms of KPIs, SASB asked IWG participants to grade each suggested indicator based on five principles: relevance, usefulness, cost-effectiveness, comparability, and auditability (with the option to provide comments and suggest alternatives).

By nature, qualitative KPIs scored lower in terms of comparability and auditability.

IWG participants were able to suggest alternative KPIs for any material issue. The last column in the table above shows the lower and higher percentage of IWG participants that suggested new KPIs for any given issue. For example, 29% of participants in Investment Banking suggested an alternative KPI to measure ‘Talent recruitment, development and retention’. This was the issue with the highest number of suggested changes. Similarly, the issue with the fewest suggested changes was ‘Legal and Regulatory Compliance’, with only 6% of participants providing alternatives to our KPIs.

Results of how each KPI scored against these criteria can be found in the tables in Appendix IV.

APPENDIX I – TOP TEN COMPANIES IN FINANCIALS SECTOR BY REVENUE

| <u>COMMERCIAL BANKS</u> This segment comprises companies that accept deposits and make loans to corporations and individuals either through a commercial banking or savings bank structure. | <u>INVESTMENT BANKING</u> This segment comprises companies that provide brokerage services to institutional investors. Institutional investors buy or sell securities on behalf of organizations such as banks, insurance companies, hedge funds, pension funds and mutual funds. | <u>ASSET MANAGEMENT AND CUSTODY ACTIVITIES</u> This segment comprises companies that manage investment portfolios on a commission or fee basis including investment management, private equity, and wealth management. | <u>CONSUMER FINANCE</u> This segment comprises companies that provide loans to consumers. Consumer loans include auto loans, consumer micro-lending, credit and debit, and student loans. | <u>MORTGAGE FINANCE</u> This segment comprises companies that provide mortgage financing services, such as mortgage lenders, mortgage bankers, mortgage REIT's, mortgage loan brokers, mortgage insurers and title insurers. | <u>SECURITY AND COMMODITY EXCHANGES</u> This segment comprises firms that operate a marketplace for the buying and selling of securities, commodities, or other financial instruments. | <u>INSURANCE</u> This segment comprises companies that underwrite life, health and medical, property and casualty, and related insurance lines, either directly or as a reinsurer; companies providing insurance related services such as claims adjusting, administrative, and advisory services; and insurance agencies and brokers. |
|--|--|---|--|---|---|---|
| WELLS FARGO & CO | JPMORGAN CHASE | BANK NY MELLON | AMERICAN EXPRESS | FANNIE MAE | NYSE EURONEXT | METLIFE INC |
| US BANCORP | GOLDMAN SACHS GP | BLACKROCK INC | CAPITAL ONE FINA | FIDELITY NATL-A | NASDAQ OMX GROUP | AMERICAN INTERNA |
| PNC FINANCIAL SE | CITIGROUP INC | STATE ST CORP | VISA INC-CLASS A | FIRST AMERICAN F | INTERCONTINENTAL | PRUDENTL FINL |
| REGIONS FINANCIAL | BANK OF AMERICA | FRANKLIN RES INC | DISCOVER FINANCI | ANNALY CAPITAL M | CBOE HOLDINGS IN | BERKSHIRE HATH-A |
| SUNTRUST BANKS | MORGAN STANLEY | INVESCO LTD | MASTERCARD INC-A | STEWART INFO SVC | WORLD ENERGY SOL | ALLSTATE CORP |
| FIFTH THIRD BANC | LPL FINANCIAL HO | AMERIPRISE FINAN | SLM CORP | MGIC INVT CORP | CME GROUP INC | TRAVELERS COS IN |
| BB&T CORP | RAYMOND JAMES | NORTHERN TRUST | WESTERN UNION | AMERICAN HOME MO | MARKETAXESS | AFLAC INC |
| HUNTINGTON BANC | JEFFERIES GROUP | SCHWAB (CHARLES) | GLOBAL PAYMENTS | AMERICAN CAPITAL | | HARTFORD FINL SV |
| M&T BANK CORP | BGC PARTNERS-A | T ROWE PRICE GRP | HEARTLAND PAYMEN | CORELOGIC INC | | PROGRESSIVE CORP |
| COMERICA INC | STIFEL FINANCIAL | TD AMERITRADE HO | TOTAL SYS SERVS | PMI GROUP INC | | CHUBB CORP |

APPENDIX II – PARTICIPANT LIST

- Stefan Ruegg Accountability
- Thomas Scheiwiller Accountability
- Stefan Ruegg Accountability
- Ted Grant Accountability
- Marc VanWeede Aegon
- Natasha Kohne Akin Gump
- Neill Mooney Alpha Watt
- Julia Gordon American Progress
- Carin Lavery ANZ Bank
- Michael Bykhovsky Applied Financial Technology
- Ashwani Chowdary Bank of America
- Dominik Mjartan Bank Southern
- Gwen Le Berre BlackRock
- John Buckley BNY Mellon
- Tames Rietdijk Bright Exchange
- Barb Brown Brown & Flynn
- Joy Poland Building Bridges 2012
- Karla Canavan Bunge
- Shirley People Calvert Investments
- Stu Dalheim Calvert Investments
- Marc Marano Canaccord Genuity
- Paul Capuzziello Capuzziello Wealth Management Group
- Karl-Heinz Morrow Carlisle & Gallagher Consulting Group
- Veena Ramani Ceres
- Andrew Logan Ceres
- Michele Skupic Chicago Title
- Michele Skupic Chicago Title
- Jeffrey Howell Chicago Title
- Moses Choi Citi Group
- Mary Abad Citi Group
- Mary Jane McQuillen Clearbridge Capital
- David Katz Compass North Advisers
- Dragomir Boyadzhiev Copula Capital Advisors
- Doug Morrow Corporate Knights
- Michael Muyot CRD Analytics
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- Nicolas Hennebert Deloitte
- Christine Robinson Deloitte
- Alfonso Ponce Deloitte
- Mark Mellen Deloitte
- Eduardo Atehortua Deloitte
- Mark Mellen Deloitte
- Christoph Klein Deutsche Bank

- Gunnar Friede Deutsche Bank
- Igor Oliveira Dinamus
- Thomas Laurent Discover Financial Services
- Vibeke Tegneby DNB ASA
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- Ralf Frank DVFA
- Charles Gates eDelta Consulting
- Pierre-Henri Moulard Ennesys
- Brian Benn Environmental Financial Solutions
- Joan Zysk Erie Insurance
- Diane Priestes Erie Insurance
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- Christine Rhodes Ernst & Young
- Aram Hong Ernst & Young
- Pal Brun Ernst & Young
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- Mel Miller First Affirmative Financial
- Louise Gardiner First Principles
- Leland Lehrman Fund Balance
- Edward Soule Georgetown University
- Hudson Cashdan Glenwood Capital
- Linda Lawson Global ESG Regulatory Academy
- Steve Sherman Green Choice Bank
- Dale Wannan Harrington Investments
- Dale Eannen Harrington Investments
- Max Rutten Helix Ventures
- Bruno Bastit Hermes Investment Management
- Kate Starr Heron Foundation
- Roberto Salazar Hexagon Group
- Julia Philpott Hitachi Consulting
- Tanya Khotin Hugo Neu
- Mirjam Staub-Bisang Independent Capital Management
- Diane Glossman Individual
- Steve Loren Individual
- Diane Glossman Individual
- Celine Ruben-Salama Individual
- Mary Beth Farrell Individual
- Lakhbir Hayre Individual
- Amy Springsteel ING Bank
- Gabriel Thoumi Integra LLC
- Lisa Tomayo-Kennedy InvestorMetrix
- Bonny Moellenbrock Investors Circle
- Sunserae Smith JP Morgan Chase

- Marisa Buchanan JP Morgan Chase
- John Katovich Katovich & Kassan Law Group
- Phillip Ludvigsen KPMG
- Susan Levitt Kroll Bond Ratings
- Nnena Nkongho Lache Management Services
- Michael Lucente Lucente Family Properties
- Alan Zimmerman MacQuarie
- Andrew Whitman Manomet Center for Conservation Sciences
- jeffrey cherry Marion Porter
- Wayne Gordon Merricks Capital
- Jo Spaulding MetLife Bank
- Milla Craig Millani Perspectives
- Michael Van Patten Mission Markets
- Betsy Gracek Morgan Stanley
- Gaston Ceron Morningstar
- Michael Wong Morningstar
- James Sinegal Morningstar
- Dan Werner Morningstar
- Maclovio Pina Morningstar
- James Sinegal Morningstar
- Mark van Clieaf MVC International
- Evan Harvey NASDAQ OMX
- Seth Wilson NASDAQ OMX
- Devika Modak Navigant
- Jonathan Lee Neighborly Energy
- Cary Krosinsky Network for Sustainable Financial Markets
- Michael Grossman New Island Capital Management
- Gregg Sgambati NJ Captive Insurance Group
- Philip Henderson NRDC
- Michelle Greene NYSE
- Steve Loren NYSSA
- Jean-Phillippe Desmartin Oddo Securities
- Nicolas Jacob Oddo Securities
- Gerrit Heyns Osmosis Investment Management
- Paul Ellis Paul Ellis Consulting
- Keren Raz Paul Weiss
- Julie Gorte Pax World Investments
- Marc larchy Phoenix Capital
- Steven Crane Presidio Graduate School
- Donald Reed PwC
- Ben Collins Rainforest Action Network
- Amy-Lyn Hall RBC
- Axel Hesse SD-M GmbH

- Dennak Murphy SEIU
- Andrew Mitchell Self
- Melissa Sage SJA Agency
- Yoshihiro Fujii Sophia University
- Dominik Mjartan Southern Bancorp
- James Vanreusel SPBD Microfinance
- James Hawley St. Mary's College
- Andrew Mason Standard Life
- Coro Strandberg Standberg Consulting
- Rebecca Wilkinson State Street Bank
- Nidhi Shandilya State Street Global Research
- Suzanne Duncan State Street Global Research
- Cornis Van Der Lugt Stellenbosch University Business School
- Tim MacDonald Stonebridge partnerships
- Coro Strandberg Strandberg Consulting
- Michael Sadowski SustainAbility
- John Finisdore Sustainable Flows
- Reginald Koizumi Sustainalytics
- Sara Olsen SVT Group
- Rachel Guthrie TD Bank Group
- Monica Sood TD Bank Group
- Gregory Chiampou Telegraph Hill Advisory
- Sonay Aykan The Center for Building at NJIT
- Jay Bruns The Hartford
- Estella He Thunderbird School of Management
- Seth Magaziner Trillium
- Stephanie Leighton Trillium
- Rebecca MacLean Trucost
- Divya Mankikar Trucost
- Bruno Bertocci UBS
- Yuki Yasui UNEP
- Catherine Chong University of Bath
- Rob Daggett USBank
- John Sundy ValuAmerica
- Eileen Brown Water Tower Financial Partners
- Bob Long Wells Fargo Home Mortgage
- Benedict Buckley World Resources Institute
- Emma Armstrong WSP Environment and Energy USA

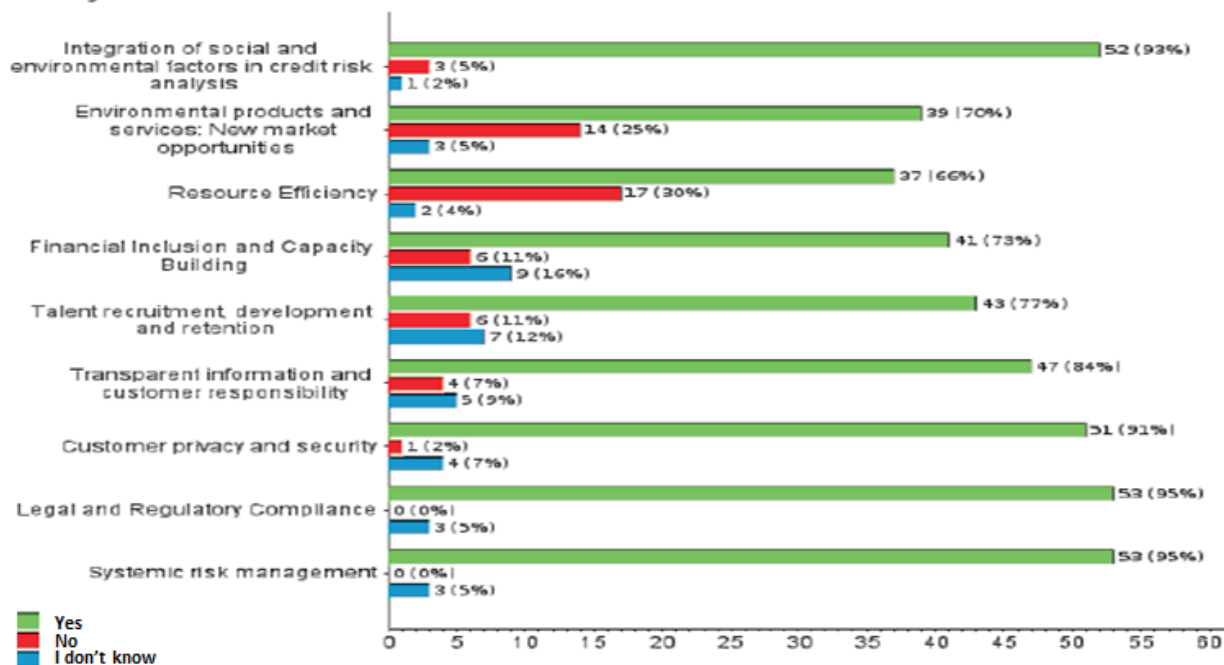
APPENDIX III – SURVEY RESULT SUMMARY TABLES – MATERIAL ISSUES

Commercial Banking – survey results

Which of these categories best describes you?

| Response | Chart | Percentage | Count |
|--|-------|------------|-------|
| Market participant -Investor, research analyst | | 43% | 24 |
| Public interest group -Government, NGO, intermediaries | | 30% | 17 |
| Corporations or industry association | | 27% | 15 |
| Total Responses | | | 56 |

[Material] In your opinion are the following ESG issues material to the Commercial Banks industry?

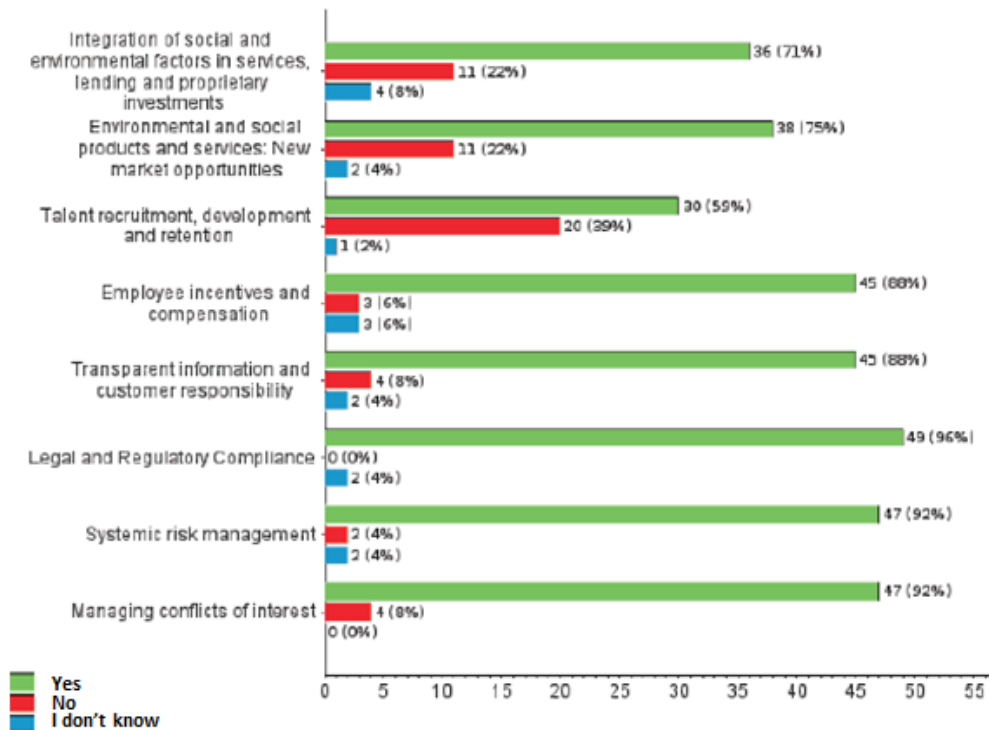


Investment Banking – survey results

Which of these categories best describes you?




| Response | Chart | Percentage | Count |
|--|-------|------------|-------|
| Market participant -Investor, research analyst | | 69% | 37 |
| Public interest group -Government, NGO, intermediaries | | 19% | 10 |
| Corporations or industry association | | 13% | 7 |
| Total Responses | | | 54 |

[Material] In your opinion are the following ESG issues material to the Investment Banking and Brokerage industry?

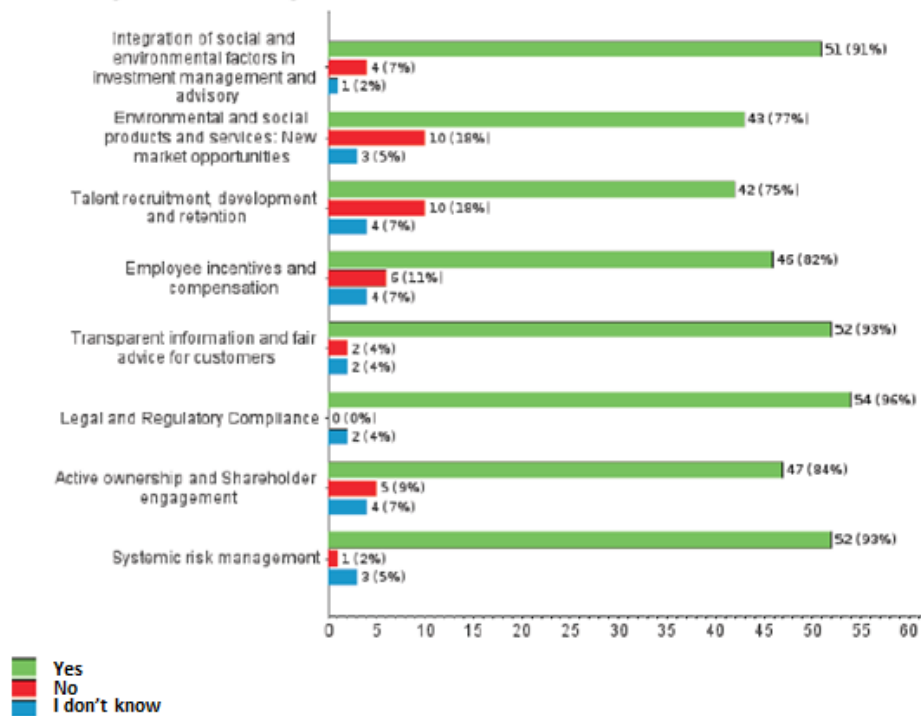


Asset Management & Custody Services – survey results

Which of these categories best describes you?

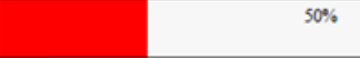


| Response | Chart | Percentage | Count |
|--|---|------------|-------|
| Market participant -Investor, research analyst |  | 61% | 34 |
| Public interest group -Government, NGO, intermediaries |  | 18% | 10 |
| Corporations or industry association |  | 21% | 12 |
| Total Responses | | | 56 |

[Material] In your opinion are the following ESG issues material to the Asset Management Custody Activities industry?

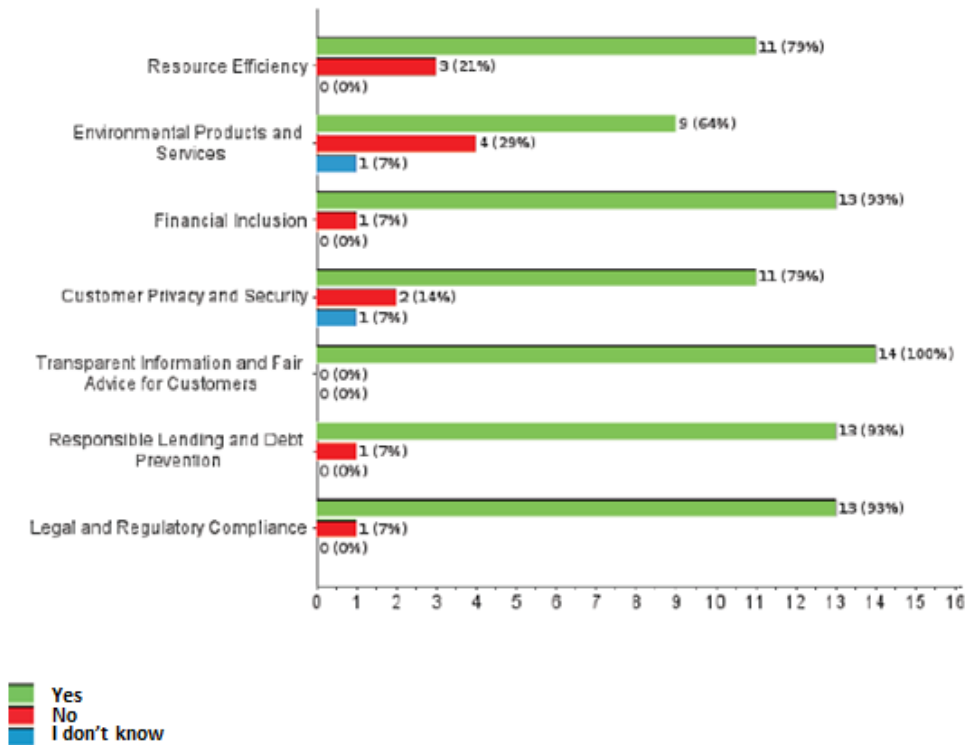


Consumer Finance – survey results

Which of these categories best describes you?

| Response | Chart | Percentage | Count |
|--|---|------------|-------|
| Market participant -Investor, research analyst |  | 50% | 7 |
| Public interest group -Government, NGO, intermediaries |  | 14% | 2 |
| Corporations or industry association |  | 36% | 5 |
| Total Responses | | | 14 |

[Material] In your opinion are the following ESG issues material to the Consumer Finance industry?

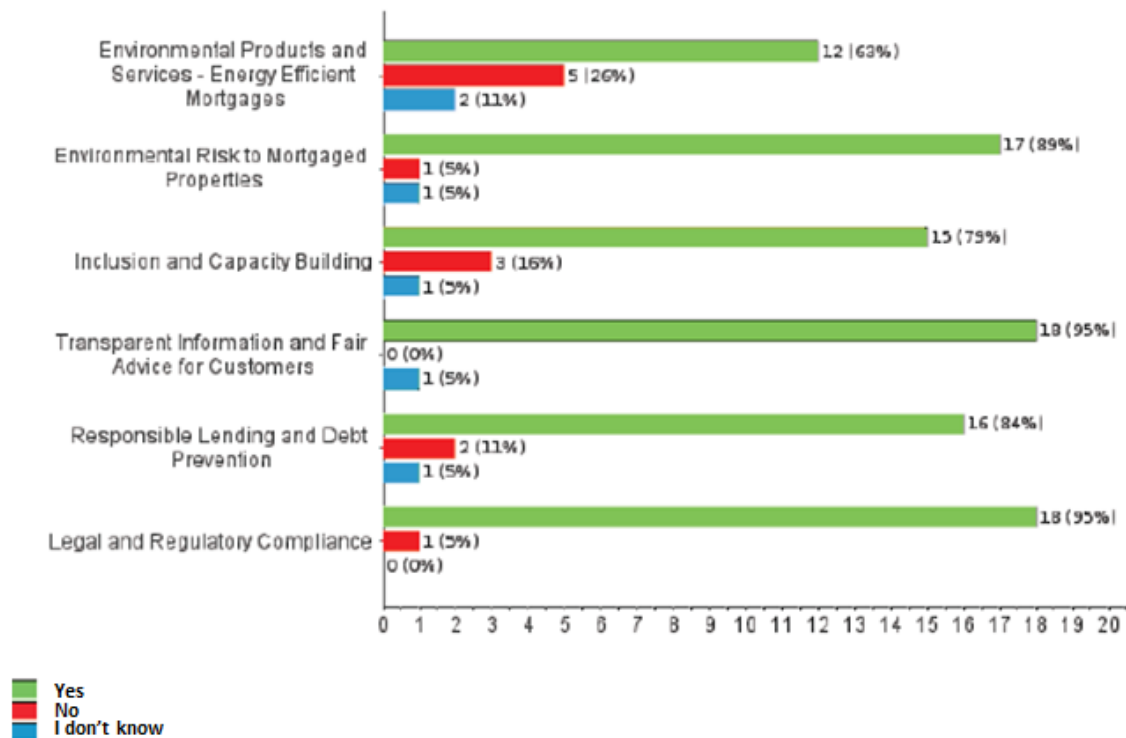


Mortgage Finance – survey results

Which of these categories best describes you?

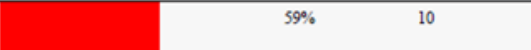


| Response | Chart | Percentage | Count |
|--|-------|------------|-------|
| Market participant -Investor, research analyst | | 26% | 5 |
| Public interest group -Government, NGO, intermediaries | | 26% | 5 |
| Corporations or industry association | | 47% | 9 |
| Total Responses | | | 19 |

[Material] In your opinion are the following ESG issues material to the Mortgage Finance industry?

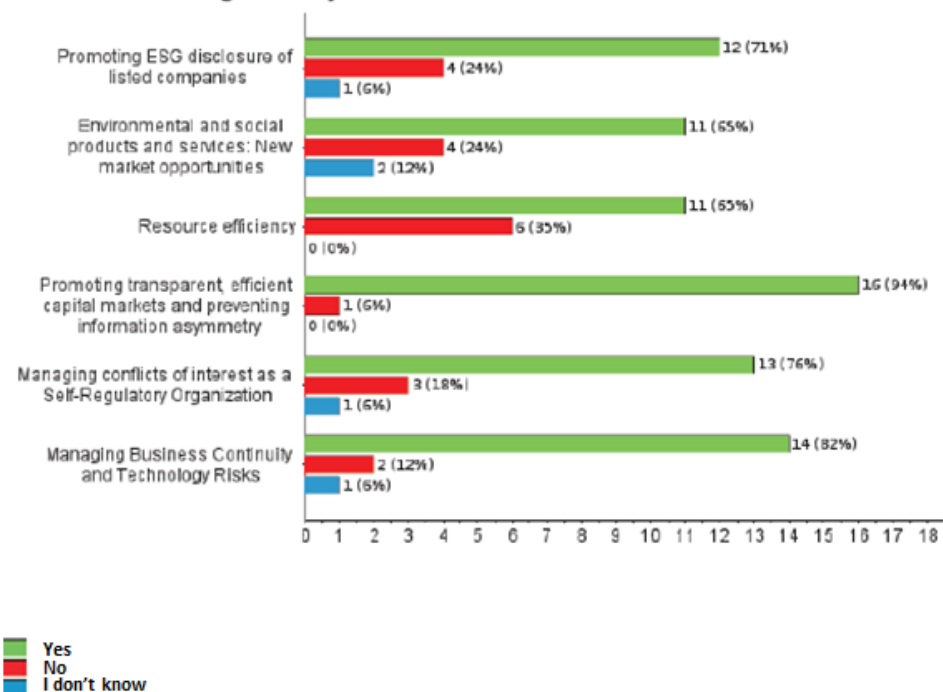


Security & Commodity Exchanges – survey results 1

Which of these categories best describes you?

| Response | Chart | Percentage | Count |
|--|--|------------|-------|
| Market participant -Investor, research analyst |  | 59% | 10 |
| Public interest group -Government, NGO, intermediaries |  | 6% | 1 |
| Corporations or industry association |  | 35% | 6 |
| Total Responses | | | 17 |

[Material] In your opinion are the following ESG issues material to the Securities Commodities Exchanges industry?

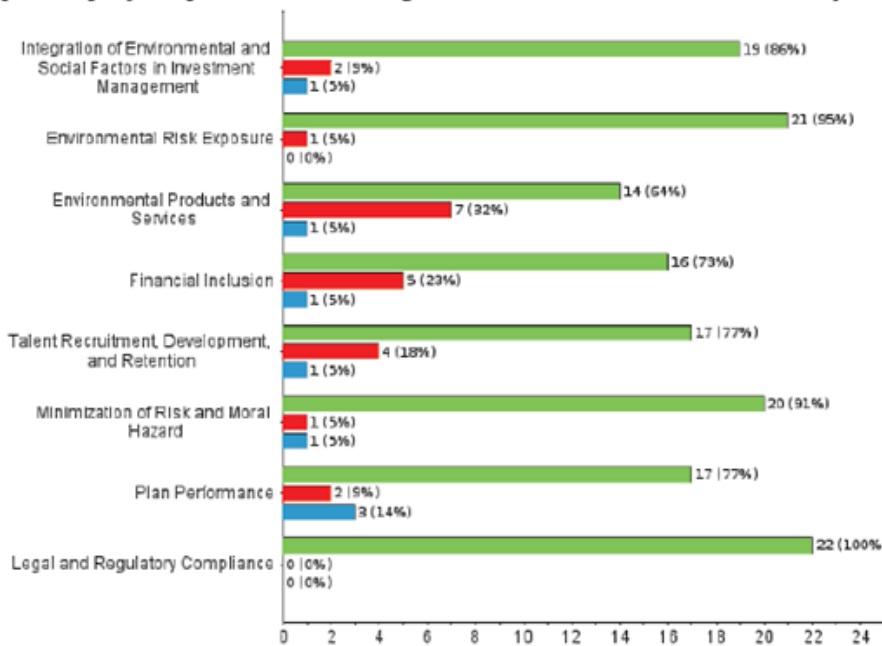


Insurance – survey results 1

Which of these categories best describes you?

| Response | Chart | Percentage | Count |
|--|-------|------------|-------|
| Market participant -Investor, research analyst | | 29% | 7 |
| Public interest group -Government, NGO, intermediaries | | 33% | 8 |
| Corporations or industry association | | 38% | 9 |
| Total Responses | | | 24 |

[Material] In your opinion are the following ESG issues material to the insurance industry?



Yes
 No
 I don't know

APPENDIX IV –

SURVEY RESULT SUMMARY TABLES – KEY PERFORMANCE INDICATOR RATINGS

| Security and Commodity Exchanges KPI Survey Results - All Interest Groups | | | | | | |
|--|--|----------|--------|----------------|------------|-----------|
| Material Issue | Suggested KPI | Relevant | Useful | Cost-effective | Comparable | Auditable |
| Promoting ESG Disclosure of listed companies | Description of exchange's policy to encourage or require listed companies to publicly disclose material ESG information | 88% | 88% | 71% | 65% | 71% |
| Promoting ESG Disclosure of listed companies | Percentage of issuers by market cap (and number) of issuers that publically disclose detailed GHG emissions according to an established protocol. | 88% | 88% | 69% | 94% | 81% |
| Promoting ESG Disclosure of listed companies | Percentage of issuers by market cap (and number) with current, published sustainability or integrated reports | 94% | 88% | 88% | 100% | 88% |
| Environmental and social products and services | Description of environmentally and socially focused products and services | 94% | 94% | 75% | 75% | 63% |
| Environmental and social products and services | Revenue received from environmentally and socially focused products and services, by category. Include volume (by dollar) for trading platforms. | 88% | 100% | 75% | 94% | 81% |
| Resource Efficiency | Total data center Power Usage Effectiveness (PUE) aggregated for all data centers. | 81% | 81% | 88% | 94% | 81% |
| Promoting transparent, efficient capital markets and preventing information asymmetry meets the criteria | Percentage of algorithmic or high frequency trades occurring on exchange. | 69% | 69% | 63% | 81% | 75% |
| Promoting transparent, efficient capital markets and preventing information asymmetry meets the criteria | Discussion of business risks and opportunities (short and long term) related to algorithmic or high frequency trading | 69% | 88% | 81% | 63% | 44% |
| Promoting transparent, efficient capital markets and preventing information | Exchange has an alert policy regarding timing and nature of disclosure of news releases, which includes provisions to - | 88% | 75% | 81% | 75% | 81% |
| Managing conflicts of interest as a Self-Regulatory Organization | Describe process to identify and assess conflicts of interest between the exchange's regulatory obligations and the interests of its members, its market operations, its listed issuers, and, in the case of a demutualized SRO, its shareholders. | 94% | 88% | 81% | 69% | 69% |
| Managing conflicts of interest as a Self-Regulatory Organization | Description of compliance/ethics program that addresses conflicts of interest the firm has identified and prioritized, how it is integrated in the firm's overall risk governance structure, and its intersection with board level oversight. | 81% | 94% | 75% | 81% | 63% |
| Managing conflicts of interest as a Self-Regulatory Organization | Description of effort to provide education, interpretation, or guidance to broker-dealer members with respect to regulatory compliance. | 81% | 81% | 81% | 75% | 56% |
| Managing conflicts of interest as a Self-Regulatory Organization | Fines and settlements incurred related to fraud, anti-trust, anti-competitive, market manipulation, malpractice or other business ethics violations. | 94% | 100% | 100% | 88% | 81% |
| Managing business continuity and technology risks | Description of error prevention and security efforts related to trading technology, IT infrastructure, services for issuers and members, websites, and information held by third parties (e.g. regulators). Where relevant, discuss how the following (NIST defined) attack threats are addressed: external/removable media, attrition (e.g., a DDoS or brute force attack), web, email, improper usage, loss/theft of equipment | 94% | 88% | 75% | 81% | 75% |
| Managing business continuity and technology risks | Number of cyber security incidents that resulted in breach of confidentiality, integrity, and availability due to deficiencies or failures of people, process, or technology. | 88% | 94% | 75% | 75% | 69% |
| Managing business continuity and technology risks | Description of procedures to mitigate market disruptions (e.g. availability and functionality of backup data centers/trading floors) related to member actions | 94% | 88% | 94% | 81% | 88% |
| Managing business continuity and technology risks | Number of significant market disruptions related to member actions (e.g. "flash crashes" from algorithmic trading), technology (e.g. cyber attack or computer failure), power losses, environmental events (e.g. loss of power), or high-risk, low probability incidents (e.g. terrorism, extreme environmental events, etc.) | 81% | 88% | 81% | 75% | 69% |

Consumer Finance KPI Survey Results - All Interest Groups

| Material Issue | Suggested KPI | Relevant | Useful | Cost-effective | Comparable | Auditable |
|---|--|----------|--------|----------------|------------|-----------|
| Resource Efficiency | Data center Power Usage Effectiveness (PUE) aggregated for all data center facilities | 71% | 71% | 86% | 93% | 93% |
| Environmental Products and Services | Description of products and services that enable or incentivize consumer environmental responsibility (e.g. renewable energy use, energy efficiency, reduced greenhouse gas emissions, patronizing of green merchants etc.) | 79% | 71% | 50% | 36% | 36% |
| Environmental Products and Services | Estimated greenhouse gas emissions avoided through consumers' use of environmentally focused products and services | 64% | 64% | 50% | 64% | 57% |
| Environmental Products and Services | Revenue from environmental products and services, by category | 86% | 86% | 71% | 79% | 86% |
| Financial Inclusion | Revenue from products and services targeting domestic unbanked, underbanked, and/or low-income segments | 93% | 93% | 79% | 79% | 86% |
| Financial Inclusion | Revenue received from emerging markets | 79% | 86% | 93% | 79% | 79% |
| Financial Inclusion | Delinquency rate (percentage of borrowers at least 90 days past due on accounts): overall, domestic segment, emerging market segment, underbanked segment products, low-income segment products. | 93% | 93% | 100% | 100% | 93% |
| Financial Inclusion | Number of participants in education, outreach, and engagement programs/initiatives | 71% | 71% | 57% | 64% | 64% |
| Customer Privacy and Security | Number of cyber security incidents that resulted in breach of confidentiality, integrity, and availability due to deficiencies or failures of people, process, or technology | 93% | 93% | 86% | 86% | 86% |
| Customer Privacy and Security | Losses due to fraudulent activity | 100% | 100% | 93% | 93% | 100% |
| Customer Privacy and Security | Description of data security and fraud prevention efforts related to: (1) new and emerging technologies (e.g. near field communication), and (2) new and emerging threats (e.g. cyber threats, card-not-present fraud, etc.) | 86% | 86% | 57% | 50% | 50% |
| Transparent Information and Fair Advice for Customers | Fines, settlements, and/or legal expenses related to disclosure or transparency, including, but not limited to, violations of the Credit CARD Act. | 100% | 93% | 100% | 100% | 100% |
| Responsible Lending and Debt Prevention | Average customer debt for customers with FICO scores above and below 640 (subprime) | 93% | 93% | 79% | 86% | 93% |
| Responsible Lending and Debt Prevention | Average APR customers with FICO scores above and below 640 (subprime) | 93% | 93% | 79% | 86% | 93% |
| Responsible Lending and Debt Prevention | Mean and median age of accounts | 71% | 79% | 86% | 86% | 86% |
| Responsible Lending and Debt Prevention | Median credit limit for customers with FICO scores above and below 640 (subprime) | 79% | 71% | 71% | 86% | 86% |
| Responsible Lending and Debt Prevention | Average monthly full payment rate (annually) OR Month-by-month full payment rate for fiscal year | 86% | 79% | 79% | 93% | 86% |
| Responsible Lending and Debt Prevention | Percentage of applications accepted for applicants with FICO scores above and below 640 (subprime) | 93% | 86% | 79% | 93% | 86% |
| Responsible Lending and Debt Prevention | Description of debt-protection/insurance products, including payout conditions and payout ratio | 86% | 79% | 64% | 71% | 71% |
| Responsible Lending and Debt Prevention | Description of pre-paid card products, including fees and interests charged | 93% | 86% | 79% | 79% | 79% |
| Responsible Lending and Debt Prevention | Revenue from "pre-account" fees associated with low-credit limit, subprime credit cards | 86% | 79% | 71% | 86% | 86% |
| Legal and Regulatory Compliance | Fines, settlements, and/or legal expenses associated with non-compliance with consumer finance industry regulations (state and federal) | 93% | 93% | 93% | 100% | 100% |
| Legal and Regulatory Compliance | Description of processes in place to ensure compliance with existing and emerging consumer finance industry regulations (state and federal) | 79% | 86% | 71% | 71% | 93% |
| Legal and Regulatory Compliance | Discussion of strategic positioning and viability of core business model with respect to the regulatory environment. | 93% | 79% | 71% | 71% | 71% |

Mortgage Finance KPI Survey Results - All Interest Groups

| Material Issue | Suggested KPI | Relevant | Useful | Cost-effective | Comparable | Auditable |
|--|--|----------|--------|----------------|------------|-----------|
| Environmental Products and Services - Energy Efficient Mortgages | Number and value of Energy Efficient Mortgages | 84% | 74% | 79% | 89% | 79% |
| Environmental Products and Services - Energy Efficient Mortgages | Estimated energy savings from Energy Efficient Mortgages (EEMs): aggregate Energy Savings Values for all EEMs | 84% | 63% | 63% | 79% | 58% |
| Environmental Risk to Mortgaged Properties | Number and value of mortgage products located in FEMA special flood hazard areas | 84% | 89% | 79% | 89% | 89% |
| Environmental Risk to Mortgaged Properties | Number and value of mortgage products in areas susceptible to environmental risks (e.g. hurricane-prone, fire-prone, high tornado risk, earthquake-prone, etc.) | 84% | 89% | 68% | 79% | 79% |
| Environmental Risk to Mortgaged Properties | Describe how climate change and other environmental risks are incorporated into credit risk analysis and valuation of underlying of mortgaged properties. Include a discussion of any discounts or adjustments offered for risk reduction measures (e.g. earthquake reinforcement, energy efficiency measures, etc.) | 89% | 79% | 68% | 68% | 53% |
| Environmental Risk to Mortgaged Properties | Total losses from environmental impacts on mortgaged properties | 89% | 84% | 58% | 84% | 79% |
| Environmental Risk to Mortgaged Properties | Percentage of mortgage properties that have been visited by company representatives for appraisal | 53% | 53% | 53% | 89% | 79% |
| Inclusion and Capacity | Description of initiatives to extend mortgage services to underserved populations (including minorities and low- and medium-income families) | 74% | 79% | 79% | 53% | 74% |
| Inclusion and Capacity | Number and value of mortgages issued to minorities (Other, Including Hispanic), as defined by the Federal Financial Institutions Examination Council | 68% | 68% | 79% | 79% | 74% |
| Inclusion and Capacity | Number and value of mortgages provided to low or moderate income individuals/families, as defined by the Federal Financial Institutions Examination Council (including Community Reinvestment Act compliant lending) | 74% | 74% | 74% | 79% | 79% |
| Inclusion and Capacity | Foreclosure rate by region and segment, including minority status and income classification | 79% | 79% | 74% | 79% | 74% |
| BuildingTransparent Information and Fair Advice for Customers | Describe how compensation of loan officers (originators) is related to terms and conditions of loans | 84% | 79% | 68% | 63% | 74% |
| BuildingTransparent Information and Fair Advice for Customers | Number of mortgages with lender-placed (aka force-placed) insurance in place (when acting as mortgage servicer) | 68% | 63% | 74% | 95% | 95% |
| BuildingTransparent Information and Fair Advice for Customers | Amount of revenue received from commissions, lump sum payments, or other forms related to lender-placed insurance | 74% | 74% | 79% | 95% | 95% |
| BuildingTransparent Information and Fair Advice for Customers | Describe efforts to enhance customers' financial literacy and provide clear, transparent, and timely communications to customers | 100% | 89% | 84% | 79% | 63% |
| BuildingTransparent Information and Fair Advice for Customers | Fines, settlements, and/or legal expenses associated with violation of Regulation Z (Truth in Lending Act) mortgage industry provisions relating to communications to customers | 95% | 95% | 84% | 89% | 95% |
| Responsible Lending and Debt Prevention | Ratio of amount of principal forgiveness to amount of foreclosed mortgages | 58% | 58% | 58% | 58% | 68% |
| Responsible Lending and Debt Prevention | Modification to foreclosure ratio | 79% | 74% | 74% | 74% | 74% |
| Responsible Lending and Debt Prevention | Number and value of Dodd-Frank designated Qualified Mortgages (QMs) | 74% | 74% | 74% | 84% | 84% |
| Responsible Lending and Debt Prevention | Number and value of mortgages of the following types: (1) Hybrid or Option ARM (ARMs with interest rate resets of <5 years, negative amortization, or interest-only payment schedules) (2) Prepayment Penalty (3) Higher Rate (at least 300 basis points above Treasuries of comparable maturity) | 74% | 74% | 74% | 79% | 84% |
| Legal and Regulatory Compliance | Fines, settlements, and/or legal expenses associated with violation of mortgage industry regulations | 89% | 95% | 89% | 95% | 95% |
| Legal and Regulatory Compliance | Discussion of strategic positioning and viability of core business model with respect to the regulatory environment | 89% | 74% | 68% | 47% | 42% |
| Legal and Regulatory Compliance | Description of processes in place to ensure compliance with existing and emerging mortgage industry regulations | 95% | 84% | 89% | 79% | 68% |

Insurance KPI Survey Results - All Interest Groups

| Material Issue | Suggested KPI | Relevant | Useful | Cost-effective | Comparable | Auditable |
|--|---|----------|--------|----------------|------------|-----------|
| Integration of Environmental and Social Factors in Investment Management | Process of integrating ESG factors in investment management - whether conducted internally or externally - including research, investment decisions, engagement and exclusions, and focusing on all major asset classes | 100% | 100% | 86% | 64% | 82% |
| Integration of Environmental and Social Factors in Investment Management | Amount of investment in companies that have a high climate risk exposure. These include, but are not limited to, the following industries: Transportation, Banking, Chemicals, Utilities, Healthcare Management Services, Multi-line Insurance, Non-renewable Energy, and Infrastructure & Real Estate. | 82% | 73% | 82% | 100% | 100% |
| Integration of Environmental and Social Factors in Investment Management | Amount of investments in companies developing innovative environmental or social solutions (e.g. low-carbon technologies, energy efficiency, renewables, social enterprise) | 77% | 77% | 73% | 73% | 73% |
| Environmental Risk Exposure | Percentage of insured products (\$ amount) susceptible to environmental risks by type of risk insured (e.g. homeowners, marine, life, travel, etc.) and geography (e.g. coastal, drought-prone, earthquake-prone, floodplains, etc.). | 95% | 95% | 77% | 77% | 86% |
| Environmental Risk Exposure | Probable Maximum Loss (PML) from environmental risks | 95% | 91% | 68% | 68% | 77% |
| Environmental Risk Exposure | Total annual insurance payout from (1) large-scale, extreme environmental events (e.g. hurricanes and earthquakes) and (2) from smaller scale, non-modeled environmental events (e.g. floods, droughts, snowstorms, tornados, etc.) | 100% | 95% | 86% | 100% | 95% |
| Environmental Risk Exposure | Describe how climate change is incorporated into catastrophe risk models | 68% | 68% | 73% | 45% | 55% |
| Environmental Risk Exposure | Percentage of insured properties that have been visited by company representatives for assessment of value. | 45% | 45% | 64% | 64% | 73% |
| Environmental Products and Services | Describe insurance products to incentivize energy efficiency and environmental responsibility (e.g. usage-based plans, discounts for fuel efficiency, green building incentives) | 73% | 73% | 82% | 59% | 73% |
| Environmental Products and Services | Describe insurance products to support innovative energy and low-carbon business models (e.g. renewable energy, energy efficiency, carbon capture and storage) | 73% | 64% | 73% | 55% | 64% |
| Environmental Products and Services | Describe insurance products against environmental risks (e.g. weather or climate change litigation) or liabilities, including those with traditionally limited coverage (e.g. asbestos, MTBE, mold) | 86% | 82% | 86% | 64% | 73% |
| Environmental Products and Services | Revenue from environmental products and services, by category | 86% | 82% | 86% | 77% | 91% |
| Financial Inclusion | Percentage of total domestic policies focused on underserved populations (broken down by low-income and high-risk groups) and by business line | 59% | 55% | 55% | 45% | 64% |
| Financial Inclusion | Retention rate for domestic underserved populations (broken down by low-income and high-risk groups) | 64% | 64% | 68% | 64% | 68% |
| Financial Inclusion | Revenue from policies focused on underserved populations in developing markets (including low-income and high-risk groups) and by business line | 82% | 73% | 64% | 68% | 68% |
| Talent Recruitment, Development, and Retention | Amount spent on industry specific training (including third-party certification or advanced education) for actuaries and underwriters | 77% | 68% | 77% | 73% | 82% |
| Talent Recruitment, Development, and Retention | Turnover for actuaries and underwriters | 68% | 59% | 73% | 73% | 68% |
| Talent Recruitment, Development, and Retention | Median years of experience for actuaries and underwriters | 68% | 55% | 68% | 77% | 73% |
| Minimization of Risk and Moral Hazard | Describe products or programs to incentivize responsible behavior or minimize health risks for customers | 77% | 73% | 68% | 50% | 55% |
| Minimization of Risk and Moral Hazard | Effectiveness of products and programs to incentivize responsible behavior and minimize risks, measured in total claims (amount) avoided and decreased loss ratio | 77% | 68% | 55% | 50% | 50% |
| Plan Performance | Complaints-to-claims ratio | 82% | 86% | 95% | 86% | 95% |
| Plan Performance | Customer retention rate | 91% | 91% | 95% | 86% | 95% |
| Plan Performance | Describe efforts to provide the following information to new and returning customers in a clear and conspicuous manner: terms and scope of coverage, policy exclusions/exceptions, and process of claims payment. Describe efforts to provide ease of access to product information throughout a customer's lifecycle (e.g. extension of coverage, filing a claim, contacts to customer service) | 68% | 64% | 45% | 27% | 36% |
| Plan Performance | Description of litigation where insurer was found liable of "insurance bad faith" where it: (1) unreasonably denied an insured's claim, (2) failed to conduct a reasonable investigation, (3) wrongfully refused to defend an insured sued by a third-party, (4) failed to provide an adequate defense to an insured sued by a third-party, or (5) failed to settle, without a reasonable basis, a third-party's suit against an insured. | 77% | 77% | 45% | 41% | 64% |
| Plan Performance | Timeliness of claim processing, measured in average number of days from claim report to payment or first contact claim resolution rate | 82% | 77% | 86% | 91% | 86% |
| Legal and Regulatory Compliance | Description of processes in place to ensure compliance with existing and emerging insurance industry regulations (State and Federal) | 86% | 77% | 55% | 64% | 64% |
| Legal and Regulatory Compliance | Discussion of strategic positioning and viability of core business model with respect to the regulatory environment. | 73% | 68% | 64% | 41% | 36% |
| Legal and Regulatory Compliance | Fines and settlements associated with state and federal insurance regulation | 86% | 91% | 95% | 95% | 95% |

Asset Management KPI Survey Results - All Interest Groups

| Material Issue | Suggested KPI | Relevant | Useful | Cost-effective | Comparable | Auditable |
|---|---|----------|--------|----------------|------------|-----------|
| Integration of social and environmental factors in investment management and advisory | Assets under management invested in companies or projects that have a high climate risk exposure. These include, but are not limited to, the following industries: Transportation, Financial Services, Chemicals, Utilities, Healthcare Management Services, Multi-line Insurance, Non-renewable Energy, Infrastructure & Real Estate. | 82% | 79% | 77% | 66% | 86% |
| Integration of social and environmental factors in investment management and advisory | Describe process of integrating ESG factors into investment management, including research, investment decisions, engagement and exclusions, and client communication, focusing on all major asset classes. Include discussion of implementation of UN Principles for Responsible Investing. | 96% | 100% | 71% | 73% | 66% |
| Integration of social and environmental factors in investment management and advisory | Assets under management invested in companies developing innovative environmental or social solutions (e.g. low-carbon technologies, energy efficiency, renewables, social enterprise) or held in accordance with general ESG due diligence and risk management criteria. | 89% | 88% | 82% | 75% | 79% |
| Environmental and social products and services: New market opportunities | Description of funds and other investment products with a focus on environmentally or socially beneficial businesses (e.g. clean tech funds, social enterprise fund, green bonds, project finance for renewable and energy efficient projects, microfinance) | 93% | 93% | 93% | 85% | 84% |
| Environmental and social products and services: New market opportunities | Assets under management invested in funds and other investment products with a focus on environmentally or socially beneficial businesses (e.g. clean tech funds, social enterprise fund, green bonds, project finance for renewable and energy efficient projects, microfinance) | 95% | 96% | 91% | 89% | 95% |
| Talent recruitment, development and retention | Training and development expenditure per full time employee by:(1) expenditures for industry or professional qualification and advanced industry education;(2) all other | 69% | 64% | 75% | 71% | 78% |
| Talent recruitment, development and retention | Employee turnover by voluntary and involuntary for: Executives/Sr. Mgrs, Mid-level Mgrs, Professionals, All others (EEO-1 categories technicians, sales, admin support, service workers) | 78% | 75% | 82% | 80% | 82% |
| Employee incentives and compensation | Total variable remuneration : total remuneration | 76% | 78% | 87% | 85% | 89% |
| Employee incentives and compensation | Percentage of variable remuneration decisions that is deferred and includes: (1) "malus" clauses, and (2) "clawback" clauses. | 91% | 93% | 87% | 89% | 89% |
| Employee incentives and compensation | Percentage of variable remuneration decisions that include risk-adjusted metrics. | 82% | 84% | 73% | 73% | 75% |
| Transparent information and fair advice for customers | Fines and settlements associated with failure to provide adequate, clear, and transparent information about products and services, including truthful advertising, transparency of small print, marketing to vulnerable groups (e.g. small investors), transparency of fees, mis-selling products, overcharging clients, and legal responsibility of firm | 98% | 96% | 87% | 89% | 91% |
| Transparent information and fair advice for customers | Describe procedure or programs to provide adequate, clear, and transparent information about products and services, including risks, suitability, alternatives, and conflict of interest (e.g. inside information or firm positions) | 93% | 85% | 78% | 72% | 72% |
| Legal and Regulatory Compliance | Description of risks and opportunities associated with current and emerging Dodd-Frank regulations | 87% | 81% | 72% | 65% | 61% |
| Legal and Regulatory Compliance | Fines, settlements, and/or legal expenses associated with criminal activities including those related to fraud, anti-trust and anti-competitive behavior (e.g. price fixing or market manipulation) insider trading, or tax evasion | 94% | 96% | 91% | 93% | 96% |
| Legal and Regulatory Compliance | Fines and settlements associated with federal banking regulation, including Basel rules, provisions of Dodd-Frank, or FDIC policies | 93% | 94% | 96% | 91% | 93% |
| Legal and Regulatory Compliance | Number of inquiries and number of complaints received by Compliance Officer through whistle blowing system/hotline. | 85% | 74% | 83% | 76% | 81% |
| Legal and Regulatory Compliance | Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR) as defined by Basel Committee on Banking Supervision | 89% | 89% | 89% | 89% | 89% |
| Active ownership and Shareholder engagement | Description of ESG-related shareholder engagement, including informal company dialogues and active management of ESG issues in private equity portfolio companies. Include a discussion of significant outcomes and any related financial implications (e.g. energy savings or cost reductions, avoided lawsuits), where applicable. | 94% | 91% | 72% | 57% | 59% |
| Active ownership and Shareholder engagement | Number and type of shareholder resolutions filed related to ESG issues. Include a description of significant outcomes. | 91% | 85% | 87% | 78% | 87% |
| Active ownership and Shareholder engagement | Percent of total proxies voted and number and type of proxy votes supporting ESG issues. Include a description of significant outcomes. | 93% | 89% | 85% | 87% | 93% |
| Systemic risk management | Description of risk management practices related to bank interconnectedness (e.g. repurchase agreements, interbank lending), geopolitics (e.g. non-domestic assets), complex financial products (e.g. notional derivatives) and information technology (technical or programming errors, risks with algorithmic and high-frequency trading) | 91% | 87% | 69% | 57% | 61% |
| Systemic risk management | Description of practices to manage high-risk, low probability events - tail risks - (e.g. natural disasters, war, widespread technological failure, loss of essential employee(s), etc.) | 87% | 89% | 78% | 65% | 70% |
| Systemic risk management | Description of strategic planning related to climate change and other ESG risks, including scenario planning. | 83% | 83% | 80% | 57% | 59% |
| Systemic risk management | Description of centralized business function to ensure consistent record keeping, uniform assessments of risk, management of conflicts of interest, compliance, and confidentiality of non-public information across business units. | 91% | 91% | 80% | 78% | 72% |

Commercial Banking KPI Survey Results - All interest Groups

| Material Issue | Suggested KPI | Relevant | Useful | Cost-effective | Comparable | Auditable |
|---|--|----------|--------|----------------|------------|-----------|
| Integration of social and environmental factors in credit risk analysis | Describe how ESG factors are incorporated into lending process, including credit risk analysis, valuation of underlying secured assets, interest rates, leverage ratios and ultimate decision to extend a loan. Include discussion of implementation of Carbon Principles, where applicable. | 93% | 91% | 71% | 67% | 75% |
| Integration of social and environmental factors in credit risk analysis | Amount of lending to companies or projects that have a high climate risk exposure. These include, but are not limited to, the following industries: Transportation, Banking, Chemicals, Utilities, Healthcare Management Services, Multi-line Insurance, Non-renewable Energy | 87% | 85% | 80% | 80% | 91% |
| Integration of social and environmental factors in credit risk analysis | Number of projects screened according to Equator Principles (or equivalent) by EP Category. | 78% | 73% | 80% | 82% | 89% |
| Integration of social and environmental factors in credit risk analysis | Discussion of implementation of Equator Principles (or equivalent) including at a minimum: (1) a description of how EPs have been incorporated into the bank's credit and risk management policies and procedures (2) responsibility for EP implementation within the bank, and (3) internal adoption processes and implementation efforts and timetables, and staff training to ensure that bank staff are fully informed of the EP standards | 82% | 82% | 67% | 64% | 78% |
| Environmental products and services: New market opportunities | Description of origination, underwriting or securitization of environmental products (e.g. securities based on renewable energy assets projects, green bonds related to reforestation) | 80% | 80% | 75% | 67% | 82% |
| Environmental products and services: New market opportunities | Amount of lending to environmentally focused companies (e.g. low-carbon technologies, energy efficiency, renewables) | 93% | 89% | 80% | 80% | 93% |
| Environmental products and services: New market opportunities | Revenue from environmental products and services, by category | 80% | 82% | 71% | 75% | 84% |
| Resource Efficiency | Total annual energy consumption (renewable and non-renewable portions) | 84% | 73% | 76% | 84% | 91% |
| Resource Efficiency | Total data center Power Usage Effectiveness (PUE), aggregated for all data centers | 78% | 73% | 69% | 87% | 93% |
| Financial Inclusion and Capacity Building | Percentage of total domestic loans and other banking products focused on underserved and underbanked business segments (e.g. low-income neighborhoods, minority-owned businesses, small and medium enterprises), by category | 87% | 82% | 78% | 80% | 82% |
| Financial Inclusion and Capacity Building | Description of initiatives to enhance customers' financial literacy, including efforts to attract unbanked, underbanked, or underserved customers. Include the number of participants in each initiative. | 75% | 69% | 69% | 58% | 65% |
| Financial Inclusion and Capacity Building | Amount of lending to companies or projects with socially beneficial focus (e.g. education or health focused, etc.) | 69% | 62% | 64% | 69% | 80% |
| Financial Inclusion and Capacity Building | Loan default rates:1. Overall domestic2. Underserved and underbanked business segments (e.g. low-income neighborhoods, minority-owned businesses, small and medium enterprises), by category3. Companies or projects with socially beneficial focus | 98% | 98% | 84% | 96% | 95% |
| Financial Inclusion and Capacity Building | Total amount of deposits in low or moderate income communities | 76% | 73% | 82% | 82% | 89% |
| Talent recruitment, development and retention | Training and development expenditure per full time employee by:(1) expenditures for industry or professional qualification and advanced industry education;(2) all other | 71% | 60% | 69% | 69% | 80% |
| Talent recruitment, development and retention | Employee turnover by voluntary and involuntary for: Executives/Sr. Mgrs, Mid-level Mgrs, Professionals, All others (EEO-1 categories technicians, sales, admin support, service workers) | 84% | 80% | 84% | 85% | 84% |
| Transparent information and customer responsibility | Fines and settlements associated with failure to provide adequate, clear, and transparent information about products and services, including truthful advertising, transparency of small print, marketing to underserved groups (e.g. SMEs), transparency of fees, or overcharging clients | 93% | 93% | 84% | 89% | 87% |
| Transparent information and customer responsibility | Describe procedure or programs to provide adequate, clear, and transparent information about products and services, including risks, terms, and fees | 78% | 80% | 67% | 58% | 69% |
| Customer privacy and security | Description of data and system security efforts including those related to new and emerging technologies (e.g. mobile banking) | 87% | 80% | 82% | 55% | 69% |
| Customer privacy and security | Number of cyber security incidents that resulted in breach of confidentiality, integrity, and availability due to deficiencies or failures of people, process, or technology | 85% | 87% | 82% | 84% | 80% |
| Legal and Regulatory Compliance | Fines and settlements associated with federal banking regulation, including Basel rules, provisions of Dodd-Frank, or FDIC policies. | 96% | 96% | 91% | 93% | 93% |
| Legal and Regulatory Compliance | Description of risks and opportunities associated with current and emerging Dodd-Frank regulations | 85% | 80% | 73% | 69% | 62% |
| Legal and Regulatory Compliance | Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR) as defined by Basel Committee on Banking Supervision | 95% | 95% | 93% | 96% | 93% |
| Legal and Regulatory Compliance | Fines, settlements, and/or legal expenses associated with criminal activities including those related to fraud, anti-trust and anti-competitive behavior (e.g. price fixing or market manipulation) insider trading, or tax evasion | 98% | 96% | 93% | 89% | 93% |
| Legal and Regulatory Compliance | Number of inquiries and number of complaints received by Compliance Officer through whistle blowing system/hotline | 78% | 76% | 80% | 73% | 73% |
| Systemic risk management | Description of centralized business function to ensure | 76% | 71% | 64% | 60% | 65% |

Investment Banking KPI Survey Results - All Interest Groups

| Material Issue | Suggested KPI | Relevant | Useful | Cost-effective |
|--|---|----------|--------|----------------|
| Integration of social and environmental factors in services, lending and proprietary investments | Amount of principal investment in companies or projects that have a high climate risk exposure. These include, but are not limited to, the following industries: Transportation, Banking, Chemicals, Utilities, Healthcare Management Services, Multi-line Insurance, Non-renewable Energy | 90% | 86% | 71% |
| Integration of social and environmental factors in services, lending and proprietary investments | Amount of principal investments in environmentally or socially focused companies (e.g. low-carbon technologies, energy efficiency, renewables, social enterprise) | 82% | 73% | 76% |
| Integration of social and environmental factors in services, lending and proprietary investments | Process of integrating material ESG risks and opportunities into core products and services, including: sell-side research (due diligence), valuation and other advisory services (fiduciary duty), origination and underwriting activities, sales and trading activities, reporting, and proprietary trading and principal investment activities | 84% | 84% | 55% |
| Integration of social and environmental factors in services, lending and proprietary investments | Description of integrating ethical risk considerations into origination of products or provision of services, including exclusion of specific sectors, if applicable. | 80% | 76% | 63% |
| Environmental and social products and services: New market opportunities | Description of origination, underwriting or market making for environmental or social products (e.g. green bonds, project finance for renewable and energy efficient projects, microfinance), Description of sell-side research focusing on ESG value drivers, Description of investment banking advisory services catering to companies developing innovative environmental or social solutions (e.g. low-carbon technologies, energy efficiency, renewables, social enterprise) | 80% | 86% | 63% |
| Environmental and social products and services: New market opportunities | Revenue from environmental and social products and services, by category | 84% | 86% | 78% |
| Talent recruitment, development and retention | Percentage of employees made redundant that were internally redeployed. | 47% | 51% | 69% |
| Talent recruitment, development and retention | Training and development expenditure per full time employee by: (1) expenditures for industry or professional qualification and advanced industry education; (2) all other | 59% | 57% | 63% |
| Talent recruitment, development and retention | Employee turnover by voluntary and involuntary for: Executives/Sr. Mgrs, Mid-level Mgrs, Professionals, All others (EEO-1 categories technicians, sales, admin support, service workers) | 73% | 76% | 76% |
| Employee incentives and compensation | Total variable remuneration : total remuneration | 90% | 88% | 90% |
| Employee incentives and compensation | Percentage of variable remuneration decisions that is deferred and includes: (1) "malus" clauses, and (2) "clawback" clauses. | 90% | 86% | 86% |
| Employee incentives and compensation | Percentage of variable remuneration decisions that include risk-adjusted metrics. | 88% | 82% | 78% |
| Transparent information and customer responsibility | Fines and settlements associated with failure to provide adequate, clear, and transparent information about products and services, including truthful advertising, transparency of small print, marketing to vulnerable groups (e.g. small investors), transparency of fees, mis-selling products, overcharging clients, and legal responsibility of firm | 96% | 96% | 85% |
| Transparent information and customer responsibility | Describe procedure or programs to provide adequate, clear, and transparent information about products and services, including risks, suitability, alternatives, conflict of interest (e.g. inside information or firm positions), and role and legal responsibility for specific engagements (e.g. in origination or structuring of products with complex liens or risks, where the bank plays a market-making role, where it is using over-the-counter platforms) | 83% | 81% | 65% |
| Legal and Regulatory Compliance | Description of risks and opportunities associated with current and emerging Dodd-Frank regulations | 90% | 90% | 77% |
| Legal and Regulatory Compliance | Fines, settlements, and/or legal expenses associated with criminal activities including those related to fraud, anti-trust and anti-competitive behavior (e.g. price fixing or market manipulation) insider trading, or tax evasion | 100% | 100% | 96% |
| Legal and Regulatory Compliance | Fines and settlements associated with federal banking regulation, including Basel rules, provisions of Dodd-Frank, or FDIC policies | 98% | 96% | 94% |
| Legal and Regulatory Compliance | Number of inquiries and number of complaints received by Compliance Officer through whistle blowing system/hotline. | 83% | 75% | 81% |
| Legal and Regulatory Compliance | Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR) as defined by Basel Committee on Banking Supervision | 94% | 94% | 94% |
| Systemic risk management | Description of risk management practices related to bank interconnectedness (e.g. repurchase agreements, interbank lending), geopolitics (e.g. non-domestic assets), complex financial products (e.g. notional derivatives) and information technology (technical or programming errors, risks with algorithmic and high-frequency trading) | 88% | 85% | 65% |
| Systemic risk management | Description of practices to manage high-risk, low probability events - tail risks - (e.g. natural disasters, war, widespread technological failure, loss of essential employee(s), etc.) | 94% | 85% | 67% |
| Systemic risk management | Description of strategic planning related to climate change and other ESG risks, including scenario planning. | 79% | 75% | 73% |
| Systemic risk management | Description of centralized business function to ensure consistent record keeping, uniform assessments of risk, management of conflicts of interest, compliance, and confidentiality of non-public information across business units. | 79% | 81% | 65% |