Bank of America

CDP Water 2017 Information Request

Module: Introduction

Page: W0. Introduction

W0.1

Introduction

Please give a general description and introduction to your organization

Bank of America is one of the world's leading financial institutions, serving individual consumers, small and middle-market businesses and large corporations with a full range of banking, investing, asset management and other financial and risk management products and services. The company provides unmatched convenience in the United States, serving approximately 46 million consumer and small business relationships with approximately 4,600 retail financial centers, approximately 15,900 ATMs, and leading online (www.bankofamerica.com) and mobile banking platforms with approximately 34 million active accounts and more than 22 million mobile active users. Bank of America is a global leader in wealth management, corporate and investment banking and trading across a broad range of asset classes, serving corporations, governments, institutions and individuals around the world. Bank of America offers industry-leading support to approximately 3 million small business owners through a suite of innovative, easy-to-use online products and services. The company serves clients through operations in all 50 states, the District of Columbia, the U.S. Virgin Islands, Puerto Rico and more than 35 countries. Bank of America Corporation stock (NYSE: BAC) is listed on the New York Stock Exchange. (As of December 31, 2016.)
At Bank of America, we are guided by a common purpose to make financial lives better through the power of every connection. We deliver on this through a strategy of responsible growth and a focus on environmental, social and governance leadership. Through these efforts, we are driving growth—investing in the success of our employees, helping to create jobs, develop communities, foster economic mobility and address society’s biggest challenges—while managing risk and providing a return to our clients and our business.

W0.2

Reporting year

Please state the start and end date of the year for which you are reporting data

Period for which data is reported
Fri 01 Jan 2016 - Sat 31 Dec 2016

W0.3

Reporting boundary

Please indicate the category that describes the reporting boundary for companies, entities, or groups for which water-related impacts are reported

Companies, entities or groups over which operational control is exercised

W0.4

Exclusions

Are there any geographies, facilities or types of water inputs/outputs within this boundary which are not included in your disclosure?

No

Module: Current State

Page: W1. Context

W1.1

Please rate the importance (current and future) of water quality and water quantity to the success of your organization

Water quality and quantity	Direct use importance rating	Indirect use importance rating	Please explain
Sufficient amounts of good quality freshwater available for use	Important	Important	The primary uses of freshwater in our operations and our value chain are employee consumption, sanitation, cooling and landscaping. We selected the importance rating for direct use because while water is not a direct input into our products and services, the availability of good quality freshwater is important to the success of our organization because it is important to provide drinking water and sanitation for our employees. Additionally, it is important to keep our facilities adequately cooled, which often requires the use of water resources. We selected the importance rating for indirect use because we purchase some products that require water as a direct input during production, and because it is important to provide drinking water and sanitation for employees.
Sufficient amounts of recycled, brackish and/or produced water available for use	Important	Important	The primary uses of recycled water in our operations are cooling, landscaping and sanitary systems. At one of our headquarters buildings, we employ an innovative system that treats and reuses contaminated groundwater. We also harvest rainwater for use in cooling systems at several locations. We selected the importance rating because it is important to keep our facilities adequately cooled, which often requires the use of water resources. By using recycled water in cooling and other applications that do not require potable water, we are reducing our use of freshwater resources. The primary uses of recycled, brackish and produced water in our value chain are cooling, landscaping and sanitary systems. A limited number of our vendors use recycled water in production. We selected the importance rating based on our assessment of the publicly available 2015 CDP water responses, in which the most frequently selected importance rating for recycled, brackish or produced water was “Important”.

W1.2

For your total operations, please detail which of the following water aspects are regularly measured and monitored and provide an explanation as to why or why not

Water aspect	% of sites/facilities/operations	Please explain
Water withdrawals- total	76-100	We quantify water withdrawals for 100% of facilities within our operational control. For facilities where

Water aspect	% of sites/facilities/operations	Please explain
volumes		we receive water bills, water withdrawals are based on billing data. Water withdrawal data is not available for sites at which we do not pay directly for utilities. We have a robust estimation methodology to account for water withdrawals from these sites.
Water withdrawals- volume by sources	76-100	We quantify water withdrawals for 100% of facilities within our operational control. For facilities where we receive water bills, water withdrawals are based on billing data. Water withdrawal data is not available for sites at which we do not pay directly for utilities. We have a robust estimation methodology to account for water withdrawals from these sites. We withdraw more than 99% of our water from municipal sources. Less than 1% of our water is withdrawn from rainwater.
Water discharges- total volumes	76-100	We quantify water discharges for 94% of facilities within our operational control. For facilities where we receive irrigation bills, water discharges are estimated based on billing data for water withdrawals and irrigation. We prioritize monitoring at sites that have irrigation needs because that is our primary consumptive water use. We feel that this level of monitoring is appropriate for our business because our total quantity of discharges is relatively low and because the vast majority of the water we discharge is discharged to municipal sewer systems and their associated treatment facilities. The primary consumptive uses of water in our operations are irrigation, which is directly metered in most cases, and use in building cooling systems. Any consumption of water by employees is negligible, and thus no estimate of employee consumption is subtracted from withdrawals. We will continue to work on expanding our understanding of our consumptive uses of water and thus our discharges.
Water discharges- volume by destination	76-100	We quantify water discharges for 94% of facilities within our operational control. For facilities where we receive irrigation bills, water discharges are estimated based on billing data for water withdrawals and irrigation. We prioritize monitoring at sites that have irrigation needs because that is our primary consumptive water use. We feel that this level of monitoring is appropriate for our business because our total quantity of discharges is relatively low and because the vast majority of the water we discharge is discharged to municipal sewer systems and their associated treatment facilities. The primary consumptive uses of water in our operations are irrigation, which is directly metered in most cases, and use in building cooling systems. Any consumption of water by employees is negligible, and thus no estimate of employee consumption is subtracted from withdrawals. We will continue to work on expanding our understanding of our consumptive uses of water and thus our discharges.
Water discharges- volume by treatment method	Less than 1%	The vast majority of the water we discharge is discharged to municipal sewer systems and their associated treatment facilities. Thus, it is not feasible to quantify water discharges by treatment method at this time. We do not have any plans to track discharges by treatment method in the future beyond ensuring that we are compliant with all applicable environmental regulations.
Water discharge quality data- quality by standard effluent parameters	Less than 1%	The vast majority of the water we discharge is discharged to municipal sewer systems and their associated treatment facilities. Thus, it is not feasible to quantify water discharges by standard effluent parameters at this time. We do not have any plans to track discharges by standard effluent parameters in the future beyond ensuring that we are compliant with all applicable environmental regulations.

Water aspect	% of sites/facilities/operations	Please explain
Water consumption- total volume	76-100	We quantify water consumption for 94% of facilities within our operational control. For facilities where we receive irrigation bills, water consumption is based on billing data. We prioritize monitoring at sites that have irrigation needs because that is our primary consumptive water use. We feel that this level of monitoring is appropriate for our business because our total consumption is relatively low. The primary consumptive uses of water in our operations are irrigation, which is directly metered in most cases, and use in building cooling systems. Any consumption of water by employees is negligible, and not estimated. We will continue to work on expanding our understanding of our consumptive uses of water and thus our discharges.
Facilities providing fully-functioning WASH services for all workers	76-100	We provide fully-functioning WASH services to all employees at 100% of our facilities.

W1.2a

Water withdrawals: for the reporting year, please provide total water withdrawal data by source, across your operations

Source	Quantity (megaliters/year)	How does total water withdrawals for this source compare to the last reporting year?	Comment
Fresh surface water	0	Not applicable	
Brackish surface water/seawater	0	Not applicable	
Rainwater	156	Much higher	Rainwater harvesting, which is used at several locations for landscaping and irrigation, increased by 90% due to an increase in irrigation activities and an increase in available rainfall.
Groundwater - renewable	0	Not applicable	
Groundwater - non-	0	Not applicable	

Source	Quantity (megaliters/year)	How does total water withdrawals for this source compare to the last reporting year?	Comment
renewable			
Produced/process water	0	Not applicable	
Municipal supply	8256	About the same	We reduced municipal water withdrawals by 6% from 2015 to 2016. The reduction was due to two primary factors. First, we have continued to improve water efficiency and conservation efforts. Second, we continue to optimize our real estate portfolio to make the most efficient use of space.
Wastewater from another organization	0	Not applicable	
Total	8412	About the same	We reduced total water withdrawals by 5% from 2015 to 2016. The reduction was due to two primary factors. First, we have continued to improve water efficiency and conservation efforts. Second, we continue to optimize our real estate portfolio to make the most efficient use of space.

W1.2b

Water discharges: for the reporting year, please provide total water discharge data by destination, across your operations

Destination	Quantity (megaliters/year)	How does total water discharged to this destination compare to the last reporting year?	Comment
Fresh surface water	0	Not applicable	
Brackish surface water/seawater	0	Not applicable	
Groundwater	0	Not applicable	
Municipal/industrial wastewater treatment plant	6596	About the same	Discharges to municipal water treatment plants were slightly lower in 2016 than 2015.

Destination	Quantity (megaliters/year)	How does total water discharged to this destination compare to the last reporting year?	Comment
Wastewater for another organization	0	Not applicable	
Total	6596	About the same	Discharges to municipal water treatment plants were slightly lower in 2016 than 2015.

W1.2c

Water consumption: for the reporting year, please provide total water consumption data, across your operations

Consumption (megaliters/year)	How does this consumption figure compare to the last reporting year?	Comment
1816	About the same	The primary consumptive uses of water in our operations are irrigation, which is directly metered in most cases, and use in building cooling systems. Any consumption of water by employees is negligible, and not estimated. We will continue to work on expanding our understanding of our consumptive uses of water and thus our discharges. Water consumption was slightly lower in 2016 than 2015.

W1.3

Do you request your suppliers to report on their water use, risks and/or management?

No

W1.3b

Please choose the option that best explains why you do not request your suppliers to report on their water use, risks and/or management

Primary reason	Please explain
Other: Not a focus of current risk management	Our supply chain water risk management process is primarily focused on flooding risk, rather than water use. The result of this risk management process made it clear that the vast majority of our suppliers are not in water-intensive industries, and thus water use in our supply chain is not a substantive issue at this time. Because of this, our company focuses on mitigating flooding risk in the supply chain, rather than asking suppliers to report information to us. This decision is reviewed annually.

W1.4

Has your organization experienced any detrimental impacts related to water in the reporting year?

No

Module: Risk Assessment

Page: W2. Procedures and Requirements

W2.1

Does your organization undertake a water-related risk assessment?

Water risks are assessed

W2.2

Please select the options that best describe your procedures with regard to assessing water risks

Risk assessment procedure	Coverage	Scale	Please explain
Comprehensive company-wide risk assessment	Direct operations and supply chain	Some facilities and some suppliers	Annual assessments consider physical risks to facilities from factors including severe weather, wildfires and flooding. Our Business Continuity group assesses risks associated with planned recovery facilities for our major locations. The assessment results are reported to business units using the major recovery facilities who then remediate the risk (e.g. by using another site) or escalate the risk for senior management review. Assessments consider potential shared risk between production and recovery facilities based on probable risks for a given geography and the specific locations of the production and recovery sites. For example, a production and recovery facility located a short distance apart from each other on the Florida south coast may have a shared hurricane risk. We prioritize risk based on scores derived through the assessment of the severity and likelihood of occurrence for each risk category. This approach and level of coverage are appropriate due to the potential impact that water could have on our operations, both directly and indirectly. We have identified supplier categories at highest risk from flooding and developed disaster recovery plans for suppliers in these categories. If flooding were to occur at a supplier facility, there is a documented plan to move the work to an alternate site. We reviewed 54 vendors and prioritized them based on vendors who provide us with a physical product (e.g., paper for statements) and those who are used enterprise-wide.

W2.3

Please state how frequently you undertake water risk assessments, at what geographical scale and how far into the future you consider risks for each assessment

Frequency	Geographic scale	How far into the future are risks considered?	Comment
Annually	Facility	3 to 6 years	Risk assessments include potential water risks and are performed at multiple points in time each year for

Frequency	Geographic scale	How far into the future are risks considered?	Comment
			various facilities. This process occurs annually. Each facility previously assessed is scheduled for a refresh every three years. This provides a schedule for our company to assess potential water-related risks that could impact our operations. We consider a timeframe of 3-6 years. This allows time for our company to assess potential water-related risks that could impact business operations.

W2.4

Have you evaluated how water risks could affect the success (viability, constraints) of your organization's growth strategy?

Yes, evaluated over the next 1 year

W2.4a

Please explain how your organization evaluated the effects of water risks on the success (viability, constraints) of your organization's growth strategy?

Annual assessments consider physical risks to our facilities from factors including severe weather, wildfires and flooding. Our Business Continuity group assesses risks associated with planned recovery facilities for our major locations. The assessment results are reported to business units using the major recovery facilities who then remediate the risk (e.g. by using another site) or escalate the risk for senior management review.
Assessments consider potential shared risk between production and recovery facilities based on probable risks for a given geography and the specific locations of the production and recovery sites. For example, a production and recovery facility located a short distance apart from each other on the Florida south coast may have a shared hurricane risk.

The results of the risk assessment inform our very near-term growth strategy in two key ways: through the development of risk mitigation strategies for existing sites, and the location of new sites.

When new facilities are to be built or existing operations consolidated, the potential risk for flooding is considered in determining the site for these operations. We prioritize risk based on scores derived through the assessment of the severity and likelihood of occurrence for each risk category. As a result of the identified flood risk, the growth strategy minimizes the potential loss of business due to flooding by having a robust risk mitigation program and carefully siting new facilities.

The growth strategy includes water risk because we feel it is important to mitigate the potential risk of damage to our facilities and lost revenues that could result from future flood events.

W2.5

Please state the methods used to assess water risks

Method	Please explain how these methods are used in your risk assessment
Internal company knowledge Regional government databases Other: Publicly-available data from private and government websites	Annual assessments consider physical risks to our facilities from a range of factors, including severe weather, wildfires and flooding. We prioritize risk based on scores derived through the assessment of the severity and likelihood of occurrence for each risk category. These scores are informed by data that are derived from publicly-available data from private and government sources, as well as internal company knowledge related to the history of severe weather, wildfires and flooding at or surrounding our sites. We feel that these methods are appropriate because the data and information are specific to the facility in question and its surrounding area. The operational scope of the risk assessment includes our major locations.

W2.6

Which of the following contextual issues are always factored into your organization's water risk assessments?

Issues	Choose option	Please explain
Current water availability and quality parameters at a local level	Not relevant, explanation provided	This issue has been considered and has been found not a substantive risk for our operations, primarily because our operations do not require significant water resources from the local river basins.
Current water regulatory frameworks and tariffs at a local level	Not relevant, explanation provided	This issue has been considered and has been found not a substantive risk for our operations, primarily because our operations do not require significant water resources from the local river basins.

Issues	Choose option	Please explain
Current stakeholder conflicts concerning water resources at a local level	Relevant, included	In 2014, in an effort to mitigate the risk of potential stakeholder conflicts in water-constrained communities, we piloted drought-tolerant landscaping at six California financial centers. This pilot is projected to reduce water usage by up to 50 percent at each center. In 2016, the California pilot saved more than $11,000 and 3.7 million gallons of water, and we expect these savings to continue going forward. Internal company knowledge of the potential for stakeholder conflicts around water resources in California and Texas was leveraged to assess risk and design the risk mitigation program. Additionally, our Corporate Workplace team was made aware of California Executive Order B-29-15, which calls for a 25 percent reduction in potable urban water usage by 2016, and this information has been used to inform further investment in water reductions at over 700 of our California facilities.
Current implications of water on your key commodities/raw materials	Relevant, included	We have completed an assessment to identify supplier categories at highest risk from flooding. We have also developed detailed disaster recovery plans for suppliers in high risk categories. If flooding were to occur at a supplier facility, there is a documented plan to move the work to an alternate site. We plan to expand this analysis to include more vendors in the future. This assessment leveraged regional government databases, publicly-available data from private and government websites and internal company knowledge regarding the location of our vendors.
Current status of ecosystems and habitats at a local level	Not relevant, explanation provided	This issue has been considered and has been found not a substantive risk for our operations, primarily because our operations do not require significant water resources from the local river basins. Our water withdrawals are almost entirely from municipal sources, which do not disrupt local ecosystems and habitats.
Current river basin management plans	Not relevant, explanation provided	This issue has been considered and has been found not a substantive risk for our operations, primarily because our operations do not require significant water resources from the local river basins.
Current access to fully-functioning WASH services for all employees	Relevant, included	We provide fully-functioning WASH services to all employees. Our Business Continuity assessments include consideration of the ability of employees to adequately travel to bank facilities and recover critical business operations after a flooding event. After an event, a recovery action plan dictates whether a site will be temporarily closed. This plan considers issues related to employee comfort and safety, such as access to sanitary services and potable water, and the functionality of fire suppression systems.
Estimates of future changes in water availability at a local level	Not relevant, explanation provided	This issue has been considered and has been found not a substantive risk for our operations, primarily because our operations do not require significant water resources from the local river basins.
Estimates of future potential regulatory changes at a local level	Not relevant, explanation provided	This issue has been considered and has been found not a substantive risk for our operations, primarily because our operations do not require significant water resources from the local river basins.
Estimates of future potential stakeholder conflicts at a local level	Relevant, included	In 2014, in an effort to mitigate the risk of potential stakeholder conflicts in water-constrained communities, we piloted drought-tolerant landscaping at six California financial centers. This pilot is

Issues	Choose option	Please explain
		projected to reduce water usage by up to 50 percent at each center. In 2016, the California pilot saved more than $11,000 and 3.7 million gallons of water, and we expect these savings to continue going forward. Internal company knowledge of the potential for current stakeholder conflicts in California and future stakeholder conflicts in Texas around water resources was leveraged to assess risk and design the risk mitigation program.
Estimates of future implications of water on your key commodities/raw materials	Relevant, not yet included	While we have considered potential current impacts to suppliers from water-related issues, future implications are pending further review. We expect this issue to be included within the next five years.
Estimates of future potential changes in the status of ecosystems and habitats at a local level	Not relevant, explanation provided	This issue has been considered and has been found not a substantive risk for our operations, primarily because our operations do not require significant water resources from the local river basins. Our water withdrawals are almost entirely from municipal sources, which do not disrupt local ecosystems and habitats.
Scenario analysis of availability of sufficient quantity and quality of water relevant for your operations at a local level	Not relevant, explanation provided	This issue has been considered and has been found not a substantive risk for our operations, primarily because our operations do not require significant water resources from the local river basins.
Scenario analysis of regulatory and/or tariff changes at a local level	Not relevant, explanation provided	This issue has been considered and has been found not a substantive risk for our operations, primarily because our operations do not require significant water resources from the local river basins.
Scenario analysis of stakeholder conflicts concerning water resources at a local level	Not evaluated	This issue has not been evaluated
Scenario analysis of implications of water on your key commodities/raw materials	Not evaluated	This issue has not been evaluated
Scenario analysis of potential changes in the status of ecosystems and habitats at a local level	Not relevant, explanation provided	This issue has been considered and has been found not a substantive risk for our operations, primarily because our operations do not require significant water resources from the local river basins. Our water withdrawals are almost entirely from municipal sources, which do not disrupt local ecosystems and habitats.
Other	Relevant, included	Current Flooding Issues: Annual assessments consider physical risks to our facilities from factors including severe weather, wildfires and flooding. Our Business Continuity group assesses risks associated with planned recovery facilities for our major locations. The assessment results are reported to business units using the major recovery facilities who then remediate the risk (e.g. by using another site) or escalate the risk for senior management review. Assessments consider potential shared risk between production and recovery facilities based on probable risks for a given geography and the specific locations of the production and recovery sites. For example, a production and recovery facility located a short distance apart from each other on the Florida south

Issues	Choose option	Please explain
		coast may have a shared hurricane risk. This assessment leverages regional government databases, publicly-available data from private and government websites and internal company knowledge regarding the location of our facilities and the history of flooding at each location.

W2.7

Which of the following stakeholders are always factored into your organization's water risk assessments?

Stakeholder	Choose option	Please explain
Customers	Relevant, included	Annual assessments consider physical risks to our facilities from factors including severe weather, wildfires and flooding. Our Business Continuity group assesses risks associated with planned recovery facilities for our major locations. The assessment results are reported to business units using the major recovery facilities who then remediate the risk (e.g. by using another site) or escalate the risk for senior management review. Assessments consider potential shared risk between production and recovery facilities based on probable risks for a given geography and the specific locations of the production and recovery sites. For example, a production and recovery facility located a short distance apart from each other on the Florida south coast may have a shared hurricane risk. The purpose of our Business Continuity assessments is to ensure that we are able to continue to provide service to clients during severe weather, wildfires or flooding. After an event, a recovery action plan dictates whether a site will be temporarily closed. This plan considers issues related to client comfort and safety, such as access to sanitary services and the functionality of fire suppression systems. We engage our clients on water-related issues as they arise. In the event of severe weather or flooding, we encourage clients to use online banking, mobile telephone banking, and contact centers. Additionally, we have a large, distributed ATM network and reciprocal agreements for our clients to use ATMs operated by other banks. We have a fleet of mobile financial centers and mobile ATMs strategically located within the US for immediate deployment to areas impacted by natural disasters.
Employees	Relevant, included	Annual assessments consider physical risks to our facilities from factors including severe weather, wildfires and flooding. Our Business Continuity group assesses risks associated with planned recovery facilities for our major locations. The assessment results are reported to business units using the major recovery facilities who then remediate the risk (e.g. by using another site) or escalate the risk for senior management review. Assessments consider potential shared risk between production and recovery facilities based on probable risks for a given geography and the specific locations of the production and recovery sites. For example, a production and recovery facility located a short distance apart from each other on the Florida south coast may have a shared hurricane risk.

Stakeholder	Choose option	Please explain
		Our Business Continuity assessments include consideration of the ability of employees to adequately travel to bank facilities and recover critical business operations after a flooding event. After an event, a recovery action plan dictates whether a site will be temporarily closed. This plan considers issues related to employee comfort and safety, such as access to sanitary services and potable water, and the functionality of fire suppression systems. We engage with our employees through risk management training. In partnership with vendors, the Business Continuity team delivers preparedness and response training for natural disasters. Additionally, through our My Work program, employees work remotely and are able to support operations should an impact occur, such as severe weather.
Investors	Relevant, included	Annual assessments consider physical risks to our facilities from factors including severe weather, wildfires and flooding. Our Business Continuity group assesses risks associated with planned recovery facilities for our major locations. The assessment results are reported to business units using the major recovery facilities who then remediate the risk (e.g. by using another site) or escalate the risk for senior management review. Assessments consider potential shared risk between production and recovery facilities based on probable risks for a given geography and the specific locations of the production and recovery sites. For example, a production and recovery facility located a short distance apart from each other on the Florida south coast may have a shared hurricane risk. Our Business Continuity assessments focus on issues that could impact our operations, which in turn impact key stakeholders, including investors. After an event, a recovery action plan dictates whether a site will be temporarily closed. We consider the potential impact to our investors throughout this risk assessment process.
Local communities	Relevant, included	In 2014, in an effort to mitigate the risk of potential stakeholder conflicts in water-constrained communities, we piloted drought-tolerant landscaping at six California financial centers. This pilot is projected to reduce water usage by up to 50 percent at each center. In 2016, the California pilot saved more than $11,000 and 3.7 million gallons of water, and we expect these savings to continue going forward.
NGOs	Not relevant, explanation provided	Our operations do not require significant water resources from local river basins. Therefore, NGOs are not relevant to our water risk assessments.
Other water users at a local level	Not relevant, explanation provided	Our operations do not require significant water resources from the local river basins. Therefore, our operations do not have a substantive impact on the water sources for other local commercial users.
Regulators	Relevant, included	We maintain compliance with all regulations. Our compliance team works with various regulatory agencies to stay up to date on any changes in regulations and ensure future compliance. For example, in 2014, in an effort to mitigate the risk of potential stakeholder conflicts in water-constrained communities, we piloted drought-tolerant landscaping at six California financial centers. This pilot is projected to reduce water usage by up to 50 percent at each center. In 2016, the California pilot saved more than $11,000 and 3.7 million gallons of water, and we expect these savings to continue going forward. These efforts helped us comply with regulations in California: California Executive Order B-29-15, which calls for a 25 percent reduction in potable urban water usage by 2016. We worked with regulators closely to understand the expectations of our facilities in California to ensure we would be able to comply.
River basin	Relevant,	In areas with high water stress, particularly from drought, we communicate with river basin management authorities

Stakeholder	Choose option	Please explain
management authorities	included	to ensure that we remain within any water withdrawal limits. For example, in 2014, in an effort to mitigate the risk of potential stakeholder conflicts in water-constrained communities, we piloted drought-tolerant landscaping at six California financial centers. This pilot is projected to reduce water usage by up to 50 percent at each center. In 2016, the California pilot saved more than $11,000 and 3.7 million gallons of water, and we expect these savings to continue going forward. These efforts helped us comply with regulations in California: California Executive Order B-29-15, which calls for a 25 percent reduction in potable urban water usage by 2016. We worked with regulators closely to understand the expectations of our facilities in California to ensure we would be able to comply.
Statutory special interest groups at a local level	Not relevant, explanation provided	Our operations do not require significant water resources from the local river basins. Therefore, local statutory special interest groups are not relevant to our water risk assessments.
Suppliers	Relevant, included	We have completed an assessment to identify supplier categories at highest risk from flooding. We have also developed detailed disaster recovery plans for suppliers in high risk categories. If flooding were to occur at a supplier facility, there is a documented plan to move the work to an alternate site either with the same vendor or with an alternate vendor. We engaged our suppliers in this effort to determine the location of their facilities and whether they had alternate facilities in other locations that could be used should an impact occur. We plan to expand this analysis to include more vendors in the future.
Water utilities at a local level	Not relevant, explanation provided	Our operations do not require significant water resources from the local river basins. Therefore, local water utilities are not relevant to our water risk assessments.
Other		

Module: Implications

Page: W3. Water Risks

W3.1

Is your organization exposed to water risks, either current and/or future, that could generate a substantive change in your business, operations, revenue or expenditure?

Yes, direct operations and supply chain

W3.2

Please provide details as to how your organization defines substantive change in your business, operations, revenue or expenditure from water risk

Material ESG risks and opportunities are those that have an impact on our stakeholders' decisions to work with us, whether as a client, investor, vendor or community partner. We collect feedback from internal and external sources, including via our National Community Advisory Council, to determine our most important issues. We completed an ESG materiality assessment in 2016, working with BSR who conducted interviews with executives and surveyed external stakeholders to determine key issues of interest. The outcomes of these interviews were reviewed, prioritized and agreed upon by our Global ESG Committee. ESG Investing and Low-Carbon Financing are among the 5 issues identified as most relevant to our ongoing growth and success.

Our Environmental and Social Risk Policy Framework (ESRPF) identifies the environmental and social topics we recognize to be of heightened importance to our company andour stakeholders, and our approach to them. Recognizing that certain sectors may be more exposed to climate change risks than others, we engage in enhanced due diligence for business activities in these sectors to evaluate the associated risks, including physical, regulatory and reputational risks. Sectors of heightened sensitivity include arctic drilling, coal, palm oil and forestry. The ESRPF sets out our positions on these matters, including certain minimum client requirements found within our policies. For example, we require clients whose business is focused on ownership and management of palm oil plantations and operations to have their operations certified to the Roundtable on Sustainable Palm Oil standard or equivalent or to have in place an outlined action plan and schedule for certification.

For CDP reporting, we consider risks and opportunities with potential financial implications of over $10 million per year to be substantive.

At the facility level, our Proximity Risk Program prioritizes risk based on scores derived through the assessment of the severity and likelihood of occurrence for each risk category.

W3.2a

Please provide the number of facilities* per river basin exposed to water risks that could generate a substantive change in your business, operations, revenue or expenditure; and the proportion of company-widefacilities this represents

Country	River basin	Number of facilities exposed to water risk	Proportion of company-wide facilities that this represents (%)	Comment
Hong Kong	Amur	15	Less than 1%	Proportion of company-wide facilities that this represents is based on square footage.
United States of America	Other: Calleguas Creek Watershed	16	1-5	Proportion of company-wide facilities that this represents is based on square footage.
United States of America	Colorado River (Pacific Ocean)	50	1-5	Total number of facilities = 156. Proportion of company-wide facilities that this represents is based on square footage.
Singapore	Other: GHAASBasin1591	10	Less than 1%	Proportion of company-wide facilities that this represents is based on square footage.
United States of America	Hudson River	50	6-10	Total number of facilities = 299. Proportion of company-wide facilities that this represents is based on square footage.
United States of America	Sacramento River - San Joaquin River	50	Less than 1%	Total number of facilities = 89. Proportion of company-wide facilities that this represents is based on square footage.
United States of America	Other: San Gabriel River	14	Less than 1%	Proportion of company-wide facilities that this represents is based on square footage.
India	Other: Sahyadri	24	Less than 1%	Proportion of company-wide facilities that this represents is based on square footage.
France	Seine	4	Less than 1%	Proportion of company-wide facilities that this represents is based on square footage.
United Kingdom	Thames	24	1-5	Proportion of company-wide facilities that this represents is based on square footage.
Japan	Tone	6	Less than 1%	Proportion of company-wide facilities that this represents is based on square footage.
United States of America	Trinity River (Texas)	50	1-5	Total number of facilities = 162. Proportion of company-wide facilities that this represents is based on square footage.

W3.2b

For each river basin mentioned in W3.2a, please provide the proportion of the company's total financial value that could be affected by water risks

Country	River basin	Financial reporting metric	Proportion of chosen metric that could be affected	Comment
Hong Kong	Amur	Other: % square footage	Less than 1%	
United States of America	Other: Calleguas Creek Watershed	Other: % square footage	1-5	
United States of America	Colorado River (Pacific Ocean)	Other: % square footage	1-5	
Singapore	Other: GHAASBasin1591	Other: % square footage	Less than 1%	
United States of America	Hudson River	Other: % square footage	6-10	
United States of America	Sacramento River - San Joaquin River	Other: % square footage	Less than 1%	
United States of America	Other: San Gabriel River	Other: % square footage	Less than 1%	
India	Other: Sahyadri	Other: % square footage	Less than 1%	
France	Seine	Other: % square footage	Less than 1%	
United Kingdom	Thames	Other: % square footage	1-5	
Japan	Tone	Other: % square footage	Less than 1%	
United States of America	Trinity River (Texas)	Other: % square footage	1-5	

W3.2c

Please list the inherent water risks that could generate a substantive change in your business, operations, revenue or expenditure, the potential impact to your direct operations and the strategies to mitigate them

Country	River basin	Risk driver	Potential impact	Description of potential impact	Timeframe	Likelihood	Magnitude of potential financial impact	Response strategy	Costs of response strategy	Details of strategy and costs
Rest of world	Other: Global	Other: Severe weather	Other: Disruption of operations	Our Asian and Australian operations are vulnerable to an increase in the severity, duration and/or frequency of tropical storms. Our operations in the southern and eastern United States, including our headquarters in Charlotte, NC, are also vulnerable to the potential for severe weather conditions. We operate over 4,700 US retail financial centers, some of which are vulnerable to the physical impacts of climate risk with the potential to disrupt the accessibility of our retail outlets to our clients. Physical risks in the US include increased	1-3 years	Probable	Medium	Other: Disaster preparedness	We estimate the additional costs of business continuity planning and recovery as a result of climate induced changes to be over $100,000 per year. We anticipate annual costs associated with our business continuity planning for as long as we are in business.	Our Building Disaster Recovery Planning (BDRP) team prepares our facilities for natural disasters. During 2016, the team managed response and recovery for 131 global events, 58 of which were natural disasters. In partnership with vendors, the team delivers preparedness and response training for natural disasters, including hurricanes. Through our My Work program and the provision of laptop, tablets and ML fobs to employees, employees can work remotely and are able to support operations should an impact occur, such as severe

Country	River basin	Risk driver	Potential impact	Description of potential impact	Timeframe	Likelihood	Magnitude of potential financial impact	Response strategy	Costs of response strategy	Details of strategy and costs
				frequency and severity of storms with related flooding, and extreme heat events resulting in drought conditions. This could lead to temporary or, in the event of severe damage, permanent closure of one of our financial centers. Our operations in Europe are also vulnerable to climate change impacts. Early 2016 saw impacts from severe rain events in the UK, causing flooding of major transit routes and employee homes. During 2016, Hurricane Matthew delivered significant damages to the coastal areas of FL, GA, and SC. Climate change may contribute to						weather. In such an event, clients are encouraged to use online banking, mobile telephone banking, and contact centers. We have a large, distributed ATM network and reciprocal agreements for our clients to use ATMs operated by other banks. We have a fleet of mobile financial centers and mobile ATMs strategically located within the U.S. for immediate deployment to areas impacted by natural disasters. In late 2016, our US Regional Support team prepared for a significant hurricane (Matthew), driving broader awareness of the threats and enabling central coordination of continuity plans for

Country	River basin	Risk driver	Potential impact	Description of potential impact	Timeframe	Likelihood	Magnitude of potential financial impact	Response strategy	Costs of response strategy	Details of strategy and costs
				less predictability around the types, timing and location of severe weather events. Implications include facility repair costs, lost work time, increased utility costs, retail outlet closures, lost revenue, and increased insurance premiums. For example, the total operational losses from the direct impacts of Superstorm Sandy on our facilities were approximately $33 million.						business lines. Our systems, platforms, and applications all performed without interruption, despite record-setting hurricane force winds, driving rains, substantial flooding, and widespread power outages. As a result of our management measures, we consider the residual risk level to be low. The cost estimate was derived through conversations with the Building Disaster Recovery Planning (BDRP) and Business Continuity teams about the nature, extent and cost of their work.
Rest of world	Other: Global	Other: Credit risk	Reduction in revenue	Flooding is an area of potential exposure for our company. There is scientific consensus that	1-3 years	Probable	Medium-high	Other: Research	By supporting the effective integration of environmental risks and operational	In each region, our business units have assigned risk managers to focus on locally relevant issues (including in

Country	River basin	Risk driver	Potential impact	Description of potential impact	Timeframe	Likelihood	Magnitude of potential financial impact	Response strategy	Costs of response strategy	Details of strategy and costs
				flood risks are increasing in many regions due to climate change. Increased flood incidence and severity could lead to our clients defaulting on their mortgage payments if, for example, flood insurance premiums become unaffordable. Clients may also find themselves in a negative equity situation due to housing values being impacted when insurance costs rise due to expanding flood hazard zones and increased flood incidence and severity. Of our current portfolio of US real estate secured loans, 4% are in a flood zone, with the majority being residential					activities across our business and by coordinating the internal project evaluating the potential implications of physical climate change, our Global Environmental Group (GEG) is central to our management of this risk. The total annual operating cost of the GEG is approximately $7 million. We expect to incur similar annual costs over the next decade.	relation to climate change). From the potential impact of water stress on agricultural clients to tidal surge impacts on coastal real estate, each of our line lines of business account accounts for climate-related risks in vetting transactions and client relationships. Transactional and client risk assessments are supported by our global research teams which cover climate related topics in their research and reports and identify associated risks and opportunities for investors. During 2016, we progressed an internal project to evaluate the potential implications of

Country	River basin	Risk driver	Potential impact	Description of potential impact	Timeframe	Likelihood	Magnitude of potential financial impact	Response strategy	Costs of response strategy	Details of strategy and costs
				loans (98%) and the remaining, commercial loans (2%). A March 2016 Thematic Investing report that we produced states that climate change and the carbon-intensive economy are already causing unprecedented damage to financial stability via physical, liability and transition risks and that without action, the cost of climate change will rise to 1-5% of GDP/year. Global investment portfolios could lose up to 45% of their value by 2020, and investors could see average returns erode by 26-138% by 2050. Physical climate change could impose a financial cost on						physical climate change for our organization. The scope of the project, which is supported by an external consultant, includes our direct operations as well as our exposure to the impacts our clients face from physical climate changes. Regarding the latter, the project is focused on a sub-group of client sectors; assessing the implications of potential changes from severe weather events, such as flooding and drought, and other physical risks for our portfolio in each of these sectors. Once complete, our aim is for the analysis to provide an indicator of how resilient our current client

Country	River basin	Risk driver	Potential impact	Description of potential impact	Timeframe	Likelihood	Magnitude of potential financial impact	Response strategy	Costs of response strategy	Details of strategy and costs
				our clients, for example through direct damage to their facilities, increased insurance premiums, and lost revenue due to facility closures, lost work time and production or distribution delays. This could have negative financial implications for our business.						portfolio is to physical climate related impacts and to also provide any recommendations regarding follow on analysis and/or other actions for us to take. The cost estimate was derived through conversations with internal teams about the nature, extent and cost of their work.

W3.2d

Please list the inherent water risks that could generate a substantive change in your business operations, revenue or expenditure, the potential impact to your supply chain and the strategies to mitigate them

Country	River basin	Risk driver	Potential impact	Description of potential impact	Timeframe	Likelihood	Magnitude of potential financial impact	Response strategy	Costs of response strategy	Details of strategy and costs

Country	River basin	Risk driver	Potential impact	Description of potential impact	Timeframe	Likelihood	Magnitude of potential financial impact	Response strategy	Costs of response strategy	Details of strategy and costs
Rest of world	Other: Global	Physical-Flooding	Supply chain disruption	Potential flooding impacts at our suppliers' facilities is the main water-related physical risk to our supply chain. The potential for flooding represents a real and serious risk to the operations of our suppliers. Extreme flooding, such as that in Thailand in 2011, has the potential to impact the supply of materials to our business operations teams.	Current-up to 1 year	Unlikely	Low-medium	Other: Disaster preparedness	This activity is a routine part of our business and thus has no incremental cost ($0).	We have identified supplier categories at highest risk from flooding and developed disaster recovery plans for suppliers in these categories. If flooding were to occur at a supplier facility, there is a documented plan to move the work to an alternate site. We reviewed 54 vendors and prioritized them based on vendors who provide us with a physical product (e.g., paper for statements) and those who are used enterprise-wide. This activity is a routine part of our business and thus has no incremental cost ($0). The cost estimate was derived through conversations with internal teams about the nature, extent and cost of their work. We plan to expand this analysis to

Country	River basin	Risk driver	Potential impact	Description of potential impact	Timeframe	Likelihood	Magnitude of potential financial impact	Response strategy	Costs of response strategy	Details of strategy and costs
										include more vendors in the future.

Page: W4. Water Opportunities

W4.1

Does water present strategic, operational or market opportunities that substantively benefit/have the potential to benefit your organization?

Yes

W4.1a

Please describe the opportunities water presents to your organization and your strategies to realize them

Country or region	Opportunity	Strategy to realize opportunity	Estimated timeframe	Comment
Company-wide	Sales of new products/services	We believe that bond issuances are one of the best tools for organizations to finance climate adaptation. This is an opportunity for us to provide additional products and services. Green bonds are fixed income, liquid financial instruments for raising debt capital for	4-6 years	The need to mobilize additional adaptation finance is particularly pressing in developing countries where adaptation capacity is often the lowest while needs are high. Through partnerships such as the Global Innovation Lab, we are participating in efforts to pilot

Country or region	Opportunity	Strategy to realize opportunity	Estimated timeframe	Comment
		climate mitigation and adaptation initiatives and were created to access the $100 trillion bond market and expanding the investor base for climate projects. We have been a leader in developing the green bond market since it began a decade ago. We worked with peers to develop the Green Bond Principles to ensure credibility, were the first firm to issue a benchmark sized green bond, and have led the market in underwriting. We estimate the potential implication of this opportunity to be over $20 billion of annual business activity. We manage this opportunity via our green bonds business. We have grown our Debt Capital Markets team focused on green bonds to four people, and we are educating our relationship bankers to be able to offer this tool to our clients. In 2016, we issued our third and largest corporate green bond for $1 billion. Bloomberg New Energy Finance recognized us as the number one underwriter of green bonds for the past three years and we led the underwriting of $25 billion in green bonds on behalf of 27 clients in 2016. In 2016, we served as green structuring agent, joint bookrunner and joint lead manager on MTR Corporation Limited's inaugural $600M green bond, including financing water management.		new forms of innovative climate finance solutions which will be needed to broaden investment opportunities both generally, and for our company specifically, in climate mitigation and adaptation in these important economic growth regions. We are also active as one of 20 principals in the Global Innovation Lab for Climate Finance. The Lab identifies, develops, and pilots transformative climate finance instruments and aims to drive billions of dollars of private investment into climate change mitigation and adaptation in developing countries. As a principal, we review submissions to the Lab, discuss the merits of each proposal, help improve the structure to make each idea more investable, and participate in working groups to help bring the finalist instruments to market.
Company-wide	Sales of new products/services	Factors including increased understanding and awareness about climate change and its causes and effects, as well as policy, reputational and financial factors are driving increased client demand for our low-carbon products and services. Opportunities exist across our lines of business. We estimate that changing client and client demand for low-carbon financing represents an opportunity for $125 billion in additional business for us from 2013 to 2025. This represents the lending, equipment finance, capital markets and advisory activities, and carbon markets finance to clients around the world to be delivered through our current $125 billion initiative. As an	1-3 years	Our research has found that investors, and particularly millennial investors, are increasingly focused on ESG factors when making investment decisions. This creates opportunities for our Global Wealth and Investment Management (GWIM) business. As of December 31, 2016, GWIM clients had more than $11.3 billion in assets with a clearly defined ESG approach. Across the industry, there has been a 33 percent increase in assets under management in ESG-type funds in just the last two years. And as millennials' wealth grows, there could be an inflow of $15–20 trillion into ESG investments over the next 20 to 30 years. Investors increasingly understand that taking

Country or region	Opportunity	Strategy to realize opportunity	Estimated timeframe	Comment
		illustration of this opportunity, increasing client demand helped us deliver $15.9 billion towards our environmental business initiative in 2016. This includes $948 million towards water-related projects. For example, in April 2016, we served as sole green structuring agent, joint bookrunner and billing & delivery agent for Banco Nacional de Costa Rica's inaugural Green Bond ($500 million) financing renewable energy projects including wind, solar and hydroelectric energy projects that are less than or equal to 50 MW of installed capacity and waste water treatment projects. Additionally, we served as lead bookrunner on Massachusetts Clean Water Trust's $208M green bond to fund wastewater infrastructure and drinking water infrastructure projects.		ESG performance into account isn't just the right thing to do, it also makes good business sense. A 2016 Equity Strategy Focus Point report from our Global Research team, titled "ESG: good companies can make good stocks," found that a company's ESG performance could be an indicator of its future stock performance.

Module: Accounting

Page: W5. Facility Level Water Accounting (I)

W5.1

Water withdrawals: for the reporting year, please complete the table below with water accounting data for all facilities included in your answer to W3.2a

Facility reference number	Country	River basin	Facility name	Total water withdrawals (megaliters/year) at this facility	How does the total water withdrawals at this facility compare to the last reporting year?	Please explain
Facility 1	Hong Kong	Amur	Multiple Sites	21	About the same	No Change
Facility 2	United States of America	Other: Calleguas Creek Watershed	Multiple Sites	66	Lower	Usage at this location decreased by about 16%. The reduction was due to two primary factors. First, we have continued to improve water efficiency and conservation efforts. Second, we have optimized our real estate portfolio to make most efficient use of space. This is consistent with our global water usage trend.
Facility 3	United States of America	Colorado River (Pacific Ocean)	Multiple Sites	308	About the same	No Change
Facility 4	Singapore	Other: GHAASBasin1591	Multiple Sites	18	About the same	No Change
Facility 5	United States of America	Hudson River	Multiple Sites	620	About the same	No Change
Facility 6	United States of America	Sacramento River - San Joaquin River	Multiple Sites	27	Much lower	Usage at this location decreased by about 34%. The reduction was due to two primary factors. First, we have continued to improve water efficiency and conservation efforts. Second, we have optimized our real estate portfolio to make most efficient use of space. This is consistent with our global water usage trend.
Facility 7	United States of America	Other: San Gabriel River	Multiple Sites	85	About the same	No Change
Facility 8	India	Other: Sahyadri	Multiple	41	About the	No Change

Facility reference number	Country	River basin	Facility name	Total water withdrawals (megaliters/year) at this facility	How does the total water withdrawals at this facility compare to the last reporting year?	Please explain
			Sites		same	
Facility 9	France	Seine	Multiple Sites	2	Much lower	Usage at this location decreased by about 36%. The reduction was due to two primary factors. First, we have continued to improve water efficiency and conservation efforts. Second, we have optimized our real estate portfolio to make most efficient use of space. This is consistent with our global water usage trend.
Facility 10	United Kingdom	Thames	Multiple Sites	78	Lower	Usage at this location decreased by about 18%. The reduction was due to two primary factors. First, we have continued to improve water efficiency and conservation efforts. Second, we have optimized our real estate portfolio to make most efficient use of space. This is consistent with our global water usage trend.
Facility 11	Japan	Tone	Multiple Sites	1	Much lower	Usage at this location decreased by about 67%. The reduction was due to two primary factors. First, we have continued to improve water efficiency and conservation efforts. Second, we have optimized our real estate portfolio to make most efficient use of space. This is consistent with our global water usage trend.
Facility 12	United States of America	Trinity River (Texas)	Multiple Sites	128	Lower	Usage at this location decreased by about 18%. The reduction was due to two primary factors. First, we have continued to improve water efficiency and conservation efforts. Second, we have optimized our real estate portfolio to make most efficient use of space. This is consistent with our global water usage trend.

Page: W5. Facility Level Water Accounting (II)

W5.1a

Water withdrawals: for the reporting year, please provide withdrawal data, in megaliters per year, for the water sources used for all facilities reported in W5.1

Facility reference number	Fresh surface water	Brackish surface water/seawater	Rainwater	Groundwater (renewable)	Groundwater (non-renewable)	Produced/process water	Municipal water	Wastewater from another organization	Comment
Facility 1	0	0	0	0	0	0	21	0	All water at this location is withdrawn from municipal sources.
Facility 2	0	0	0	0	0	0	66	0	All water at this location is withdrawn from municipal sources.
Facility 3	0	0	0	0	0	0	308	0	All water at this location is withdrawn from municipal sources.
Facility 4	0	0	0	0	0	0	18	0	All water at this location is withdrawn from

Facility reference number	Fresh surface water	Brackish surface water/seawater	Rainwater	Groundwater (renewable)	Groundwater (non-renewable)	Produced/process water	Municipal water	Wastewater from another organization	Comment
									municipal sources.
Facility 5	0	0	0	0	0	0	620	0	All water at this location is withdrawn from municipal sources.
Facility 6	0	0	0	0	0	0	27	0	All water at this location is withdrawn from municipal sources.
Facility 7	0	0	0	0	0	0	85	0	All water at this location is withdrawn from municipal sources.
Facility 8	0	0	0	0	0	0	41	0	All water at this location is withdrawn from municipal sources.
Facility 9	0	0	0	0	0	0	2	0	All water at this location is withdrawn from municipal sources.
Facility 10	0	0	0	0	0	0	78	0	All water at this location is withdrawn from municipal sources.
Facility 11	0	0	0	0	0	0	1	0	All water at this location is

Facility reference number	Fresh surface water	Brackish surface water/seawater	Rainwater	Groundwater (renewable)	Groundwater (non-renewable)	Produced/process water	Municipal water	Wastewater from another organization	Comment
									withdrawn from municipal sources.
Facility 12	0	0	0	0	0	0	128	0	All water at this location is withdrawn from municipal sources.

W5.2

Water discharge: for the reporting year, please complete the table below with water accounting data for all facilities included in your answer to W3.2a

Facility reference number	Total water discharged (megaliters/year) at this facility	How does the total water discharged at this facility compare to the last reporting year?	Please explain
Facility 1	21	About the same	No Change
Facility 2	66	Lower	Discharges at this location decreased by about 12%.
Facility 3	237	About the same	No Change
Facility 4	18	About the same	No Change
Facility 5	559	Higher	Discharges at this location increased by about 11%.
Facility 6	21	Much lower	Discharges at this location decreased by about 23%.
Facility 7	85	About the same	No Change

Facility reference number	Total water discharged (megaliters/year) at this facility	How does the total water discharged at this facility compare to the last reporting year?	Please explain
Facility 8	41	About the same	No Change
Facility 9	2	Much lower	Discharges at this location decreased by about 36%.
Facility 10	78	Lower	Discharges at this location decreased by about 18%.
Facility 11	1	Much lower	Discharges at this location decreased by about 67%.
Facility 12	92	Much lower	Discharges at this location decreased by about 20%.

W5.2a

Water discharge: for the reporting year, please provide water discharge data, in megaliters per year, by destination for all facilities reported in W5.2

Facility reference number	Fresh surface water	Municipal/industrial wastewater treatment plant	Seawater	Groundwater	Wastewater for another organization	Comment
Facility 1	0	21	0	0	0	The vast majority of the water we discharge is discharged to municipal sewer systems and their associated treatment facilities.
Facility 2	0	66	0	0	0	The vast majority of the water we discharge is discharged to municipal sewer systems and their associated treatment facilities.
Facility 3	0	237	0	0	0	The vast majority of the water we discharge is discharged to municipal sewer systems and their associated treatment facilities.
Facility 4	0	18	0	0	0	The vast majority of the water we discharge is discharged to municipal sewer systems and their

Facility reference number	Fresh surface water	Municipal/industrial wastewater treatment plant	Seawater	Groundwater	Wastewater for another organization	Comment
						associated treatment facilities.
Facility 5	0	559	0	0	0	The vast majority of the water we discharge is discharged to municipal sewer systems and their associated treatment facilities.
Facility 6	0	21	0	0	0	The vast majority of the water we discharge is discharged to municipal sewer systems and their associated treatment facilities.
Facility 7	0	85	0	0	0	The vast majority of the water we discharge is discharged to municipal sewer systems and their associated treatment facilities.
Facility 8	0	41	0	0	0	The vast majority of the water we discharge is discharged to municipal sewer systems and their associated treatment facilities.
Facility 9	0	2	0	0	0	The vast majority of the water we discharge is discharged to municipal sewer systems and their associated treatment facilities.
Facility 10	0	78	0	0	0	The vast majority of the water we discharge is discharged to municipal sewer systems and their associated treatment facilities.
Facility 11	0	1	0	0	0	The vast majority of the water we discharge is discharged to municipal sewer systems and their associated treatment facilities.
Facility 12	0	92	0	0	0	The vast majority of the water we discharge is discharged to municipal sewer systems and their associated treatment facilities.

W5.3

Water consumption: for the reporting year, please provide water consumption data for all facilities reported in W3.2a

Facility reference number	Consumption (megaliters/year)	How does this compare to the last reporting year?	Please explain
Facility 1	0	About the same	No Change
Facility 2	0	Much lower	Consumption at this location decreased by about 94%. The reduction was due to two primary factors. First, we have continued to improve water efficiency and conservation efforts. Second, we have optimized our real estate portfolio to make most efficient use of space. This is consistent with our global water usage trend.
Facility 3	70	Lower	Consumption at this location decreased by about 14%. The reduction was due to two primary factors. First, we have continued to improve water efficiency and conservation efforts. Second, we have optimized our real estate portfolio to make most efficient use of space. This is consistent with our global water usage trend.
Facility 4	0	About the same	No Change
Facility 5	60	About the same	No Change
Facility 6	6	Much lower	Consumption at this location decreased by about 57%. The reduction was due to two primary factors. First, we have continued to improve water efficiency and conservation efforts. Second, we have optimized our real estate portfolio to make most efficient use of space. This is consistent with our global water usage trend.
Facility 7	0	About the same	No Change
Facility 8	0	About the same	No Change
Facility 9	0	About the same	No Change
Facility 10	0	About the same	No Change
Facility 11	0	About the same	No Change
Facility 12	36	Lower	Consumption at this location decreased by about 13%. The reduction was due to two primary factors. First, we have continued to improve water efficiency and conservation efforts. Second, we have optimized our real estate portfolio to make most efficient use of space. This is consistent with our global water usage trend.

W5.4

For all facilities reported in W3.2a what proportion of their water accounting data has been externally verified?

Water aspect	% verification	What standard and methodology was used?
Water withdrawals- total volumes	76-100	International Standard on Assurance Engagements (ISAE) 3000 (water withdrawal). See attached verification statement.
Water withdrawals- volume by sources	Not verified	Water withdrawals are not verified by source.
Water discharges- total volumes	Not verified	Water discharges are not verified.
Water discharges- volume by destination	Not verified	Water discharges are not verified.
Water discharges- volume by treatment method	Not verified	Water discharges are not verified.
Water discharge quality data- quality by standard effluent parameters	Not verified	Water discharges are not verified.
Water consumption- total volume	Not verified	Water consumption is not verified.

Module: Response

Page: W6. Governance and Strategy

W6.1

Who has the highest level of direct responsibility for water within your organization and how frequently are they briefed?

Highest level of direct responsibility for water issues	Frequency of briefings on water issues	Comment
Board of individuals/Sub-set of the Board or other committee appointed by the Board	Scheduled-annual	The Corporate Governance Committee of the Board of Directors has ultimate responsibility for climate change. As stated in its Charter, this Committee is responsible for periodically reviewing the company's strategy, policies and practices regarding environmental, social and related governance (ESG) matters that are significant to the company and receiving updates from the Global ESG Committee, which is the management-level committee responsible for significant ESG activities. The Global ESG Committee is accountable to the chief executive officer and is chaired by Anne Finucane, Vice Chairman. Ms. Finucane is the executive management team member with direct responsibility for leading the company's ESG efforts.

Highest level of direct responsibility for water issues	Frequency of briefings on water issues	Comment
		The Global ESG Committee, which is comprised of senior leaders across every business line and support group, meets at least three times a year and reports regularly to the Corporate Governance Committee of the Board of Directors.

W6.2

Is water management integrated into your business strategy?

Yes

W6.2a

Please choose the option(s) below that best explains how water has positively influenced your business strategy

Influence of water on business strategy	Please explain
Establishment of sustainability goals	We are working to utilize resources in a manner that is efficient and sustainable. We have set a second generation goal to reduce global water use by 45% from 2010 to 2020. As a result, we have reduced our water withdrawals by 37% since 2010. Also, we have an environmental business initiative to address climate change and natural resource demands, emphasizing energy efficiency, renewable energy, transportation, waste and water. In 2015, we increased our second environmental business initiative from $50B to $125B by 2025 to support low-carbon and sustainable business. Our efforts consist primarily of lending, equipment finance, capital markets and advisory activity, carbon finance, and advice and investment solutions for clients. Since 2013 we have delivered $49 billion in lending, equipment finance, capital markets and

Influence of water on business strategy	Please explain
	advisory activities, and carbon markets finance to clients around the world. As an illustration of this opportunity, increasing client demand helped us deliver $15.9 billion towards our environmental business initiative in 2016.This includes $948 million towards water-related projects. For example, in April 2016, we served as sole green structuring agent, joint bookrunner and billing & delivery agent for Banco Nacional de Costa Rica's inaugural Green Bond ($500 million) financing renewable energy projects including wind, solar and hydroelectric energy projects that are less than or equal to 50 MW of installed capacity and waste water treatment projects.
Water resource considerations are factored into location planning for new operations	We account for factors such as potential for flooding when determining the location for our facilities. As a result of any identified flood risk, our growth strategy minimizes the potential loss of business due to flooding by having a robust risk mitigation program and carefully siting new facilities. The outcome of this influence is the mitigation of the potential risk of damage to our facilities and lost revenues that could result from future flood events.
Publicly demonstrated our commitment to water	We are working to utilize resources in a manner that is efficient and sustainable. We have set a second generation goal to reduce global water use by 45% from 2010 to 2020. As a result, we have reduced our water withdrawals by 37% since 2010. Also, we have an environmental business initiative to address climate change and natural resource demands, emphasizing energy efficiency, renewable energy, transportation, waste and water. In 2015, we increased our second environmental business initiative from $50B to $125B by 2025 to support low-carbon and sustainable business. Our efforts consist primarily of lending, equipment finance, capital markets and advisory activity, carbon finance, and advice and investment solutions for clients. Since 2013 we have delivered $49 billion in lending, equipment finance, capital markets and advisory activities, and carbon markets finance to clients around the world. As an illustration of this opportunity, increasing client demand helped us deliver $15.9 billion towards our environmental business initiative in 2016.This includes $948 million towards water-related projects. For example, in April 2016, we served as sole green structuring agent, joint bookrunner and billing & delivery agent for Banco Nacional de Costa Rica's inaugural Green Bond ($500 million) financing renewable energy projects including wind, solar and hydroelectric energy projects that are less than or equal to 50 MW of installed capacity and waste water treatment projects.

W6.2b

Please choose the option(s) below that best explains how water has negatively influenced your business strategy

Influence of water on business strategy	Please explain
No measurable influence	Water has not negatively influenced our business strategy, primarily because our operations do not require significant water resources from the local river basins. Additionally, our risk assessment process mitigates the potential risk of damage to our facilities and lost revenues that could result from future flood events. Our Business Continuity group assesses risks associated with planned recovery facilities for our major locations. The assessment results are reported to lines of business using the major recovery facilities who then decide whether to remediate the risk (e.g. by using another site) or to develop complementary risk reduction strategies. Finally, when new facilities are to be built or existing operations consolidated, the potential risk for flooding is considered in determining the site for these operations. As a result of the identified flood risk, the growth strategy minimizes the potential loss of business due to flooding by having a robust risk mitigation program and carefully siting new facilities. No future influence is expected because we will continue to not require significant water resources from the local river basins. Additionally, we will continue our robust risk assessment and mitigation procedures that reduce our exposure to water-related risks.

W6.3

Does your organization have a water policy that sets out clear goals and guidelines for action?

Yes

W6.3a

Please select the content that best describes your water policy (tick all that apply)

Content	Please explain why this content is included
Publicly available Company-wide Performance standards for direct	Our publicly available company-wide water policy includes: - Our goal to reduce water withdrawals 45% from 2010-2020; - The vendor code of conduct. Environmental stewardship is essential to the sustainability of our business and the health of the communities where we live and serve. We expect our vendors to operate with this principle in mind, and to measure, reduce

Content	Please explain why this content is included
operations Performance standards for supplier, procurement and contracting best practice Commitment to customer education Incorporated within group environmental, sustainability or EHS policy Acknowledges the human right to water, sanitation and hygiene Other: Commitment to employee education	and mitigate the environmental impacts of their operations, including water usage; - Our Environmental Management System, which encourages stringent compliance with applicable environmental laws and regulations like the Clean Water Act, recognizes the human right to water, sanitation and hygiene through our Human Rights Commitment, to which operations and vendors are held; - Our Environmental and Social Risk Policy Framework (ESRPF) identifies the environmental and social topics of heightened sensitivity and importance to us and our stakeholders; - Client education through a variety of water awareness events; - Our My Environment program. Through benefits, education and volunteerism, we offer employees the tools and resources to act as better environmental stewards at work, at home and in the community. This program includes water conservation and volunteering, like International Coastal Cleanup with Ocean Conservancy and water restoration projects with the National Fish and Wildlife Foundation. We include the above to illustrate our commitment to preserving natural resources.

W6.4

How does your organization's water-related capital expenditure (CAPEX) and operating expenditure (OPEX) during the most recent reporting year compare to the previous reporting year?

Water CAPEX (+/- % change)	Water OPEX (+/- % change)	Motivation for these changes
-100	1	No CAPEX was spent on water efficiency projects in 2016. Water operational expenditure increased 1%. Cost per gallon increased 7%.

Page: W7. Compliance

W7.1

Was your organization subject to any penalties, fines and/or enforcement orders for breaches of abstraction licenses, discharge consents or other water and wastewater related regulations in the reporting year?

No

Page: W8. Targets and Initiatives

W8.1

Do you have any company wide targets (quantitative) or goals (qualitative) related to water?

Yes, targets and goals

W8.1a

Please complete the following table with information on company wide quantitative targets (ongoing or reached completion during the reporting period) and an indication of progress made

Category of target	Motivation	Description of target	Quantitative unit of measurement	Base-line year	Target year	Proportion of target achieved, % value
Absolute reduction of water withdrawals	Water stewardship	In 2016, we set an aggressive operational goal to reduce water withdrawals 45% by 2020 from a 2010 base year. We set this target because it is important to our company to include a water conservation target in our set of comprehensive environmental operational goals. Throughout our goal-setting process, we consulted a variety of internal	% reduction of water sourced from municipal supply	2010	2020	83%

Category of target	Motivation	Description of target	Quantitative unit of measurement	Base-line year	Target year	Proportion of target achieved, % value
		and external stakeholders to ensure that our goal was sufficiently aggressive to drive real and meaningful changes in operation throughout our business. Specifically, we looked at each of our key building types – retail financial centers, operations and data centers – to determine where we could make reductions. We discovered several opportunities to reduce water, including smart irrigation at retail financial centers and faucet aerators at retail financial centers and operations sites, and projected water use reductions from these projects.				

W8.1b

Please describe any company wide qualitative goals (ongoing or reached completion during the reporting period) and your progress in achieving these

Goal	Motivation	Description of goal	Progress
Other: Environmental financing initiative	Water stewardship	In 2015, we pledged to increase the company's current environmental business initiative from $50 billion to $125 billion by 2025 to address climate change and demands on natural resources through lending, investing, capital raising, advisory services, and developing financing solutions for clients around the world. This initiative emphasizes energy efficiency, renewable energy, transportation, waste and water. Our water investments focus on innovative new technologies and infrastructure development, including water purification. We adopted this goal because we believe it is important to support business activities that address climate change and demands on natural resources.	We are on track to achieve this goal by 2023. Since 2013 we have delivered $49 billion in lending, equipment finance, capital markets and advisory activities, and carbon markets finance to clients around the world. As an illustration of this opportunity, increasing client demand helped us deliver $15.9 billion towards our environmental business initiative in 2016. This includes $948 million towards water-related projects. For example, in April 2016, we served as sole green structuring agent, joint bookrunner and billing & delivery agent for Banco Nacional de Costa Rica's inaugural Green Bond ($500 million) financing renewable energy projects including wind, solar and hydroelectric energy projects that are less than or equal to 50 MW of installed capacity and waste water treatment projects. Additionally, we served as lead

Goal	Motivation	Description of goal	Progress
			bookrunner on Massachusetts Clean Water Trust's $208M green bond to fund wastewater infrastructure and drinking water infrastructure projects.

Module: Linkages/Tradeoff

Page: W9. Managing trade-offs between water and other environmental issues

W9.1

Has your organization identified any linkages or trade-offs between water and other environmental issues in its value chain?

Yes

W9.1a

Please describe the linkages or trade-offs and the related management policy or action

Environmental issues	Linkage or trade-off	Policy or action
Energy and greenhouse gas emissions reduction activities	Trade-off	Water-Cooled Mechanical Systems: We are often confronted with the trade-off between energy/greenhouse gas (GHG) savings and water savings when choosing mechanical systems. For example, water-cooled mechanical systems typically consume less energy, but consume more on-site water. While utility costs (energy and water) are considered,

Environmental issues	Linkage or trade-off	Policy or action
		reliability often is the determining factor when making choices regarding mechanical systems. At one of our headquarters buildings, we employ an innovative system that allows us to treat and reuse contaminated groundwater. We also harvest rainwater for use in cooling systems at several locations. These management programs allow us to capitalize on the energy efficiency benefits of water-cooled mechanical systems without increasing the use of potable water.
Energy use	Linkage	The energy-water nexus is two-fold: the delivery of water consumes energy, and the production of energy consumes water. We have opportunities to reduce energy consumption through reduced water use, and to reduce water use through reduced energy consumption. Delivery of Water: The quantity of water that we use and the distance that water travels both directly influence the greenhouse gas (GHG) emissions associated with water consumption. As we continue to reduce our water withdrawals, the associated GHG emissions will also decrease. One management policy is our goal to reduce global water use by 45% from 2010 to 2020. Thus far, we have reduced our water withdrawals by 37% since 2010, which in turn reduces global GHG emissions that result from the delivery of water. Generation of Electricity: The quantity of energy that we use influences the quantity of water that is consumed to generate that electricity. Thus, reducing our energy consumption will result in a reduction in water usage by those producing that energy. One management policy is our goal to reduce our location-based Scope 1 and 2 GHG emissions by 50% from 2010 to 2020. Thus far, we have seen a 42% reduction in Scope 1 and 2 GHG emissions, which was due in part to greatly improved energy efficiency in retail banking centers, office buildings, and operations centers.

Module: Sign Off

Page: Sign Off

W10.1

Please provide the following information for the person that has signed off (approved) your CDP water response

Name	Job title	Corresponding job category
Lisa Shpritz	SVP, Environmental Operations Executive	Environment/Sustainability manager

CDP