

C0. Introduction

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C0.1

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**(C0.1) Give a general description and introduction to your organization.**

U.S. Bancorp, with nearly 70,000 employees and \$573 billion in assets as of December 31, 2021, is the parent company of U.S. Bank National Association. The Minneapolis-based company serves millions of customers locally, nationally and globally through a

diversified mix of businesses: Consumer and Business Banking, Payment Services, Corporate & Commercial Banking and Wealth Management and Investment Services. The company has been recognized for its approach to digital innovation, social responsibility and customer service, including being named one of the 2022 World's Most Ethical Companies by Ethisphere Institute, and Fortune's most admired superregional bank. Learn more at [usbank.com/about](https://usbank.com/about).

When we use the terms "U.S. Bancorp," "company," "we," "us," or "our" in this report, we mean U.S. Bancorp and its subsidiaries, including U.S. Bank National Association, on a consolidated basis, unless we state, or the context implies, otherwise.

At U.S. Bancorp, we care deeply about promoting sustainable business practices while supporting economic growth and we embrace our responsibility to be a good steward of our natural resources. We have implemented a 'continuous improvement' approach by protecting and conserving our natural resources through methods such as: 1) Developing business practices that protect and conserve our natural resources; 2) Embracing opportunities for new products, services and partnerships that improve our environmental sustainability and 3) Adopting new technologies, such as renewable resources, that continue to reduce our carbon footprint. Many of these approaches can create long-term value for our stakeholders through increased revenues, reduced costs and reduced risks. But just as importantly, these efforts can help improve the world we all share.

The actual and potential impacts of climate change on the company can be categorized as either risks or opportunities. We continue to improve our understanding of key risks that climate change poses to our company, customers and communities, and we are making strategic adjustments to our scenario analysis, policies and operational practices accordingly. We also see opportunities in making investments in renewable energy and offering innovative products and services to meet the needs of tomorrow's green economy.

C0.2

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**(C0.2) State the start and end date of the year for which you are reporting data.**

	Start date	End date	Indicate if you are providing emissions data for past reporting years	Select the number of past reporting years you will be providing emissions data for
Reporting year	January 1 2021	December 31 2021	No	<Not Applicable>

C0.3

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**(C0.3) Select the countries/areas in which you operate.**

- Belgium
- Canada
- Cayman Islands
- Germany
- Ireland
- Lithuania
- Luxembourg
- Norway
- Poland
- Spain
- Sweden
- United Kingdom of Great Britain and Northern Ireland
- United States of America

C0.4

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**(C0.4) Select the currency used for all financial information disclosed throughout your response.**

USD

C0.5

(C0.5) Select the option that describes the reporting boundary for which climate-related impacts on your business are being reported. Note that this option should align with your chosen approach for consolidating your GHG inventory.

Operational control

C-FS0.7

(C-FS0.7) Which activities does your organization undertake, and which industry sectors does your organization lend to, invest in, and/or insure?

	Does your organization undertake this activity?	Insurance types underwritten	Industry sectors your organization lends to, invests in, and/or insures
Banking (Bank)	Yes	<Not Applicable>	Exposed to all broad market sectors
Investing (Asset manager)	No	<Not Applicable>	<Not Applicable>
Investing (Asset owner)	No	<Not Applicable>	<Not Applicable>
Insurance underwriting (Insurance company)	No	<Not Applicable>	<Not Applicable>

C0.8

(C0.8) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

Indicate whether you are able to provide a unique identifier for your organization	Provide your unique identifier
Yes, a Ticker symbol	USB

C1. Governance

C1.1

(C1.1) Is there board-level oversight of climate-related issues within your organization?

Yes

C1.1a

(C1.1a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for climate-related issues.

Position of individual(s)	Please explain
Board-level committee	The U.S. Bancorp Board of Directors oversees the management, business and strategy of the company and its most significant risks and has delegated specific and focused oversight of certain types of risks/ opportunities to its various committees. The Board annually reviews/ approves the company's three-year strategic plan, which includes the ESG strategy. Risk oversight responsibility is primarily carried out through standing committees. The Board's Risk Management Committee (RMC) oversees climate-related risks and the Board's Public Responsibility Committee (PRC) oversees ESG strategy. The RMC oversees execution of our Risk Management Framework, which includes policies to govern the management of risks, including climate risk. It includes our Risk Appetite Statement, which was updated beginning in 2021 to include climate risk and is approved annually by the RMC. Climate risk is integrated into our overall risk management process and is included as a material risk that is assessed/ managed as part of our risk appetite. The RMC receives quarterly reports from management on emerging risks, including climate risk, and regular "deep-dive" climate risk updates. Management-level risk oversight under the RMC is led by the Executive Risk Committee (ERC). The ESG Committee is a sub-committee of the ERC, providing clarity, direction, accountability, and oversight of ESG topics. The PRC oversees policies/ programs related to corporate responsibility and ESG strategy. To carry out these responsibilities, they receive regular updates from management on the ESG strategy and climate-related goals/ commitments, including priorities to achieve ESG commitments with relevant timelines & metrics in order to oversee and hold management accountable for progress. The PRC also oversees ESG disclosure and communications plans. The Audit Committee receives periodic updates on climate-related disclosure requirements and ESG reporting, including associated disclosure controls. The Compensation and Human Resource Committee (CHRC) oversees our executive compensation program. Beginning in 2021, our CHRC implemented a qualitative review process for bonus funding determination for our executives. This determination is based on the Committee's assessment of factors that include considerations related to ESG matters and human capital management.

C1.1b

**(C1.1b) Provide further details on the board’s oversight of climate-related issues.**

Frequency with which climate-related issues are a scheduled agenda item	Governance mechanisms into which climate-related issues are integrated	Scope of board-level oversight	Please explain
Scheduled – some meetings	Reviewing and guiding strategy Reviewing and guiding major plans of action Reviewing and guiding risk management policies Monitoring and overseeing progress against goals and targets for addressing climate-related issues	Climate-related risks and opportunities to our own operations Climate-related risks and opportunities to our banking activities The impact of our own operations on the climate	Our Board of Directors oversees the management, business and strategy of the company and its most significant risks and has delegated specific and focused oversight of certain types of risks and opportunities to its various committees. The Board annually reviews and approves the company’s three-year strategic plan, which includes the company’s ESG strategy. The Board also receives periodic strategy updates related to our business and priority initiatives, which have included updates on our ESG strategy and priorities, environmental finance commitments, and sustainable finance framework to support and enable ESG business opportunities. The Public Responsibility Committee (PRC) receives regular updates from management on the company’s ESG strategy and climate-related goals and commitments, including our goal announced in November 2021 to achieve net zero greenhouse gas emissions by 2050. The PRC receives information from management on priorities to achieve our ESG commitments, relevant timelines, and related metrics in order to oversee and hold management accountable for progress. The Public Responsibility Committee also oversees our ESG disclosure and communications plans, including relating to our annual ESG Report. In addition, the Risk Management Committee (RMC) annually reviews and approves the company’s Risk Management Framework, which includes policies to govern the management of credit, operational, compliance and other risks, including climate risk that could be generated by climate change. This framework includes our Risk Appetite Statement, which was updated beginning in 2021 to include climate risk and is approved annually by the RMC. The RMC receives quarterly reports from management on emerging risks, including climate risk, and regular “deep-dive” climate risk updates. The Audit Committee receives periodic updates on climate-related disclosure requirements and the company’s ESG reporting, including associated disclosure controls. The Compensation and Human Resource Committee oversees our executive compensation program. We recognize the increased importance of ESG in measuring executive performance. Beginning in 2021, our Compensation and Human Resources Committee implemented a qualitative review process for bonus funding determination for our executives. This determination is based on the Committee’s assessment of factors that include considerations related to ESG matters and human capital management.

**C1.1d**

**(C1.1d) Does your organization have at least one board member with competence on climate-related issues?**

	Board member(s) have competence on climate-related issues	Criteria used to assess competence of board member(s) on climate-related issues	Primary reason for no board-level competence on climate-related issues	Explain why your organization does not have at least one board member with competence on climate-related issues and any plans to address board-level competence in the future
Row 1	Yes		<Not Applicable>	<Not Applicable>

**C1.2**

**(C1.2) Provide the highest management-level position(s) or committee(s) with responsibility for climate-related issues.**

Name of the position(s) and/or committee(s)	Reporting line	Responsibility	Coverage of responsibility	Frequency of reporting to the board on climate-related issues
Other C-Suite Officer, please specify (U.S. Bank’s Chief Administrative Officer)	CEO reporting line	Both assessing and managing climate-related risks and opportunities	Risks and opportunities related to our own operations	Quarterly
Chief Risks Officer (CRO)	CEO reporting line	Both assessing and managing climate-related risks and opportunities	Risks and opportunities related to our banking Risks and opportunities related to our investing activities Risks and opportunities related to our own operations	Quarterly

**C1.3**

**(C1.3) Do you provide incentives for the management of climate-related issues, including the attainment of targets?**

	Provide incentives for the management of climate-related issues	Comment
Row 1	Yes	

**C1.3a**

**(C1.3a) Provide further details on the incentives provided for the management of climate-related issues (do not include the names of individuals).**

Entitled to incentive	Type of incentive	Activity incentivized	Comment
Other C-Suite Officer	Monetary reward	Emissions reduction target Behavior change related indicator	Our Vice Chair and Chief Administrative Officer (CAO) has high level oversight of company environmental strategy and policy, including our GHG emissions reduction target of 40% by 2029 (completed) and 60% by 2044 (completed in 2021). This includes employee engagement around environmental efforts to reduce corporate emissions, customer engagement and driving internal change towards being more environmentally responsible. The CAO has oversight of strategy and initiatives to drive U.S. Bancorp's environmental progress, including meeting our target, and this is written into the CAO annual performance goals. Compensation is informed by achieving the goals in annual performance goal plans.
Executive officer	Monetary reward	Emissions reduction target Behavior change related indicator	Our Chief Social Responsibility Officer (CSRO) is responsible for managing the employees who set U.S. Bancorp's environmental strategy, including performance targets. The CSRO is also responsible for managing reputational climate change risk in partnership with the CSRO team. Management of climate change strategy and risk is part of performance goals and success is incentivized through annual performance awards.
Environment/Sustainability manager	Monetary reward	Emissions reduction target Behavior change related indicator	Our VP - Environmental Program Manager (EPM) is responsible for coordinating efforts to engage employees and modify behaviors to reduce emissions, as well as working across business lines to coordinate energy/ emissions reduction initiatives. The EPM also reviews pertinent environmental due diligence escalations from the business lines to determine whether further escalation is needed. Success is incentivized through annual performance awards.
Energy manager	Monetary reward	Emissions reduction target Energy reduction project	Our VP - Energy Manager within Corporate Real Estate is responsible for managing and supporting our energy reduction program as well as renewable energy efforts. Success is incentivized through annual performance awards.
ESG Portfolio/Fund manager	Monetary reward	Portfolio/fund alignment to climate-related objectives	Renewable energy managers within the U.S. Bancorp Community Development Corporation are responsible for tax credit investing of projects within the solar/ renewable energy industry. These projects help customers reduce or avoid GHG emissions. These managers are incentivized by the number of renewable energy projects they facilitate and manage.
All employees	Non-monetary reward	Behavior change related indicator	Development and implementation of sustainability initiatives, including those which have direct impact on emissions reduction, such as energy reduction and transportation initiatives. U.S. Bancorp employees are encouraged to recognize each other using the Best in US portal - U.S. Bancorp's employee recognition program.
Chief Risk Officer (CRO)	Monetary reward	Behavior change related indicator Other (please specify) (integrating climate risk into our existing strong risk management framework)	Our Vice Chair and Chief Risk Officer (CRO) has responsibility to manage the company's high and emerging risks through our risk management framework, including climate risk. At the CRO's request, U.S. Bancorp formed a climate risk working group in 2020 to monitor, assess, and act on potential climate risk issues facing our company. A separate climate scenarios working group was established to evaluate different financial outcomes from physical and transition risks. Integrating climate risk into U.S. Bancorp's strong enterprise risk management framework falls within her purview and is written into the CRO annual performance goals. Compensation is informed by achieving the goals in annual performance goal plans.
Chief Executive Officer (CEO)	Monetary reward	Emissions reduction target Behavior change related indicator	Our Chairman, President and CEO has responsibility to ensure the company is being prudent in managing climate risk and is meeting climate targets. ESG is a component of company & management committee performance objectives and ultimately progress is considered in the incentive funding and as appropriate in individual executive award decisions along with other financial and non-financial performance outcomes.
Business unit manager	Monetary reward	Behavior change related indicator	In 2021, U.S. Bancorp appointed a new climate risk executive. Working in partnership with the ESG program office, the climate risk executive and climate team focus on identifying, measuring, monitoring and mitigating risks associated with climate change. Enhancing our climate team supports business strategy and activities while enabling us to prudently manage our risks over both the short- and long-term. Compensation is informed by achieving the goals in annual performance goal plans.
Business unit manager	Monetary reward	Emissions reduction target Energy reduction target Behavior change related indicator	While ESG has always been implicit in everything we do, in 2021 we made the strategic decision to build out an explicit and comprehensive structure, governance and operating model around ESG. We created a formal ESG program office and recruited a seasoned sustainability leader from outside the Company to lead this group. This centralized office is built on a hub-and-spoke model. The ESG program office (the hub) sets a One U.S. Bank strategy around ESG strategies, goals, disclosures and communications. The business lines (the spokes) partner with the ESG Program Office to set the strategy and execute individual ESG programs and initiatives. Compensation is informed by achieving the goals in annual performance goal plans.

**C-FS1.4**

**(C-FS1.4) Does your organization offer its employees an employment-based retirement scheme that incorporates ESG criteria, including climate change?**

	Employment-based retirement scheme that incorporates ESG criteria, including climate change	Describe how funds within the retirement scheme are selected and how your organization ensures that ESG criteria are incorporated	Provide reasons for not incorporating ESG criteria into your organization's employment-based retirement scheme and your plans for the future
Row 1	No, and we do not plan to in the next two years	<Not Applicable>	We are closely monitoring ESG developments across the retirement plan industry, as well as the importance of fiduciary responsibilities associated with ESG initiatives for retirement plan sponsors. We design our retirement programs to support the retirement goals of our employees and are focused on comparability to the competitive market, plan efficiency and overall plan value. If an employee wants to invest in a specific sector not offered in our core 401k line up (ESG or otherwise) they can use our self-directed brokerage window with the in the plan for more investment optionality.

**C2. Risks and opportunities**

**C2.1**

**(C2.1) Does your organization have a process for identifying, assessing, and responding to climate-related risks and opportunities?**

Yes

**C2.1a**

**(C2.1a) How does your organization define short-, medium- and long-term time horizons?**

	From (years)	To (years)	Comment
Short-term	0	3	
Medium-term	3	10	
Long-term	10	30	

**C2.1b**

**(C2.1b) How does your organization define substantive financial or strategic impact on your business?**

U.S. Bancorp would define substantive as having a significant financial, reputation or social impact, or impacting our business operations and/ or brand, making it difficult to execute our strategy or to meet the needs of our customers and communities. From a qualitative perspective, factors include consideration around: 1) number of business lines and/ or customers affected, 2) potential financial loss and/or revenue as a result of the risk or opportunity, and 3) stakeholder attention around the risk/ opportunity, including potential effect on U.S. Bancorp's reputation. From a quantitative perspective, potential losses in the \$200+ million range are deemed material and receive additional risk governance and oversight, which aligns with capital planning processes.

**C2.2**

**(C2.2) Describe your process(es) for identifying, assessing and responding to climate-related risks and opportunities.**

**Value chain stage(s) covered**

Direct operations

**Risk management process**

Integrated into multi-disciplinary company-wide risk management process

**Frequency of assessment**

More than once a year

**Time horizon(s) covered**

Short-term

Medium-term

Long-term

**Description of process**

We continue to improve our understanding of key risks that climate change poses to our company, customers and communities, and we are making strategic adjustments to our scenario analyses, policies and operational practices accordingly. We also see opportunities in making investments in renewable energy and offering innovative products and services to meet future needs. For the purpose of the Bank's formal risk Identification framework managed by Enterprise Risk Management, climate-related risks are relevant across many risk categories within our Risk Management Framework. These risks can be freestanding, but they can also cross categories to create inter-risk exposure - for example, the increased severity and frequency of severe weather events may impact our lending portfolios (credit risk), our ability to conduct business (operational risk), and key third-party relationships (another aspect of operational risk). To better manage climate risk in our company, we are developing a Climate Risk Management Framework, which describes how we are integrating climate risk into each risk category by leveraging existing risk management processes supplemented by climate risk related analysis. We recognize that climate change risks are dynamic and present varying degrees of impact over different time horizons. As our strategy and risk management approaches continue to evolve, we plan to incorporate an analysis of risk time horizons, recognizing that long term risks of 30+ years are prevalent. From a transition risk perspective, we recognize that there are industries in our lending portfolio that possess incremental risk related to climate. As a case study for how we identify, assess, and respond to these types of risks is in Our Oil & Gas and Power (Utilities) industries have increased monitoring and oversight as transition risks may have an oversized impact relative to other portfolios. This includes leveraging key elements of our U.S. Bank Risk Management Framework, such as establishment of risk limits and enhanced monitoring and reporting. Due to the increase in the length of the U.S. wildfire season during recent years, as well as the increase in wildfire frequency, intensity, and coverage area, we identified wildfire risk as an important acute physical risk that should be evaluated. This risk is even more relevant to U.S. Bancorp due to its large customer footprint in the western United States. Therefore, we are currently developing an idiosyncratic scenario analysis, which evaluates the credit and operational impacts of severe wildfires within the western United States. Also from a physical risk perspective, climate change has the potential to affect our operations budget through more extreme heating and cooling seasons. To reduce risk and impact, our Corporate Real Estate group has been tasked with better managing our energy use and as a result, developed an operational strategy that is twofold: continue seeking opportunities to purchase renewable energy for our facilities while also working to reduce energy use at our facilities. These efforts are producing meaningful progress as GHG emissions from operations have been reduced by over 66% (using 2014 as a baseline). Purchasing renewable energy allows us to better manage our energy costs and leaves us less vulnerable to energy fluctuations, while reducing the energy we use allows us to lower risk through increased efficiency, leaving us less vulnerable to extreme weather. This has resulted in opportunities to save money with facilities that are more efficient by following sustainable principles in the design phase and retrofitting. It has also allowed us to increase vendor partnerships, such as purchasing renewable energy through Xcel Energy's Renewable Connect program and participating in PGE's Clean Wind program. To formalize our commitment, U.S. Bancorp announced in November 2021 its goal to obtain 100% of operational electricity from renewable sources by 2025. U.S. Bancorp embraces a balanced approach to addressing potential material environmental and social risk impacts on our communities, customers, employees, and shareholders. Our risk management process is designed to help us appropriately manage the risk associated with serving our customers, including those in higher-risk industries. Our Environmental and Social Risk Policy provides an enterprise approach to managing and overseeing risks associated with the company's relationships, including, but not limited to, legal reputational, regulatory, and financial risks. In addition to the diligence performed on all customers, enhanced due diligence applies to all prospective and existing customers that operate within environmentally sensitive industries and which meet specific credit thresholds. This due diligence includes past and present compliance with applicable environmental laws and the customer's framework for management of environmental risks. From an opportunities perspective, much of our environmental finance activity happens through the U.S. Bancorp Community Development Corporation (USB CDC), including Renewable Energy Tax Credits investments that help provide clean energy options to our nation's homes, towns and businesses. These projects are not only good for the environment, but they also create tens of thousands of jobs in local communities around the country. We commit more than \$1 billion annually in renewable energy investments, and since 2007, the USB CDC has committed more than \$13 billion in solar, energy storage, wind, biomass and fuel cell technologies. Our solar portfolio spans a broad customer base, which diversifies risk within our environmental finance activities. Outside of the USB CDC, we also power the transition to a low-carbon economy with loans to clients in our utilities portfolio who must expend meaningful capital resources to ensure that their operations meet increasing regulatory mandates for renewable energy and through our green auto lending program. As new opportunities to finance ecofriendly initiatives emerge, we use a value-based prioritization process, balancing a product's net value (considering its alignment with our goals and financial benefits) with ease of implementation (considering resource requirements and conformity with our credit risk framework). We are currently evaluating the landscape of potential environmental finance activities that could help our customers transition to a low-carbon economy, such as U.S. Bank's recently developed renewable energy debt product created in 2021.

**(C2.2a) Which risk types are considered in your organization's climate-related risk assessments?**

	Relevance & inclusion	Please explain
Current regulation	Relevant, always included	In December 2021, the OCC released draft principles on climate risk management for large banks. The principles provide a high-level framework for safe and sound management of exposures to climate-related financial risks, consistent with OCC existing risk management related rules and guidance. The OCC invited public feedback on the principles. In March 2022, the SEC released a 500-page proposed rule on climate-related disclosures. The proposed rule is intended to provide clarity and standardization on material climate-related risks that will impact the company and dictates information that a registrant will need to disclose in its annual filings. If the proposed rule is adopted as described therein, the company's climate-related disclosures would be included starting with the company's Form 10-K filed with the SEC for fiscal year 2023. While not yet final, there is a clear path towards this type of regulation, and we believe our risk management framework is structured in a way to assess the impact of regulations.
Emerging regulation	Relevant, always included	As a financial services company, we are highly regulated, so this is always relevant to our business and included in our ongoing assessment of risks related to climate change. We monitor the regulatory environment closely through our Regulatory Change Management Group in Compliance Risk Department and our Legal Regulatory Group within the Law Division. These groups are actively engaged in potential climate policy matters and potential regulations, while participating in industry working groups. The Legal Regulatory Group is a key contributor to the Climate Risk Working Group that drives climate related risk management initiatives and our formal risk management process includes a detailed review by the compliance team who is well versed in current regulations. We recognize that the regulatory environment is increasing with significant regulatory attention and resources focused on climate risks, and we aim to be aligned with regulatory expectations, while also being proactive in mitigating risks associated with climate change. An example of emerging regulation that is being assessed through our risk management process is increased taxes and regulation around energy and fuel. Increased taxes and regulation around fuel and energy would increase the operating cost to run U.S. Bancorp's over 2,300 locations. It might also affect the type of energy we can purchase, which has the potential to force us into fuel/ energy purchasing agreements with a higher cost than previous partnerships. In 2021, U.S. Bancorp spent approximately \$58 million on energy to operate our over 2,300 locations. If fuel and energy taxes increase, these costs will increase the level of funding needed to operate our facilities. In 2021, U.S. Bank announced the goal to source electricity for bank operations from 100% renewable energy by 2025.
Technology	Relevant, always included	U.S. Bank offers many online services that reduce emissions by eliminating the need to travel to branches for customers' banking needs, as well as reducing paper use. Data security is paramount to who we are as a company and to our industry in general, so any risks involved with these services are evaluated through our risk management process. As an example, U.S. Bank was the first bank to offer banking services on all three major platforms: Amazon Alexa, Google Home and Apple Siri. In order to reduce risk of unauthorized persons accessing customer information through these types of devices, certain banking functions are not allowed when using these platforms. Precautions need to be taken to ensure service to our customers continues in the event a data center is impacted. Higher reliance on technology also presents risk within our operation. As a financial services company, we require multiple data centers that are strategically placed across our footprint to ensure operation resiliency should one data center be impacted by a natural disaster. We also see physical climate change risk associated with our data centers due to increased energy use with more dramatic temperature changes. Data centers also create unique physical security risks, in the event of heightened natural disasters caused by climate change.
Legal	Relevant, sometimes included	We define legal risk as risks associated with legal proceedings or disputes that arise out of activities conducted by bank business lines and personnel. This risk generally involves litigation or regulatory enforcement actions. With mainly office-based operations, U.S. Bancorp's business activities do not generally subject the company to material climate and environmental related litigation or regulatory enforcement actions. We recognize that the law could evolve over time, which may increase the risk of litigation and/or regulatory enforcement activity. We further recognize that a failure to comply with laws or regulations relevant to our business activities could result in civil penalties and increased litigation related expenses. Due to this risk, we continue to monitor the legal implications of the changing climate and how they may impact U.S. Bancorp based on our geographic footprint and business activities.
Market	Relevant, sometimes included	Market shifts do affect our customers, which in turn can affect our bottom line through an increase in write-offs. For example, if the shift to a low carbon economy increases the market for electric vehicles, any automotive industry manufacturers who have not effectively transitioned might see a decrease in revenue, resulting in an inability to meet financial commitments, which would, in turn, affect U.S. Bancorp's business. When we expect a market shift that would affect a large number of customers, we would then include the risk in our portfolio review and risk assessment. With the shift to a low carbon economy, U.S. Bancorp is continuing to look at products to assist and/ or encourage our customers with this shift. Examples are the recent approval of a new renewable energy lending product and exploring expanded impact investment offerings. Because of this, we see market shifts as both a risk and an opportunity to expand our business. In addition, as climate risk events increase, we expect the potential for more frequent market shock events. The company currently maintains a strong capital structure, non-high risk trading strategies, and a risk management framework that includes stress scenarios to estimate potential loss from a severe market shock.
Reputation	Relevant, always included	U.S. Bancorp embraces a balanced approach to addressing any potential ESG impact on our communities, customers, employees, and shareholders. Our risk management process is designed to help us appropriately manage the risk associated with serving our customers, including those in higher-risk industries. Our Environmental and Social Risk Policy provides an enterprise approach to managing and overseeing risks associated with the company's relationships, including, but not limited to, legal reputational, regulatory, and financial risks. In addition to the diligence performed on all customers, enhanced due diligence applies to all prospective and existing customers that operate within environmentally sensitive industries and which meet specific credit thresholds. This due diligence includes past and present compliance with applicable environmental laws and the customer's framework for management of environmental risks. We've also enhanced our approach on assessing climate risk; we have established an Environmental, Social and Governance Committee, Relationship Review Working Group and a Climate Risk Working Group to share, monitor, and report on relevant reputation and potentially financial risks. All are comprised of senior leaders representing business and enablement functions across the company.
Acute physical	Relevant, always included	Natural disasters affect U.S. Bancorp's customers and can lead to their inability to fulfil commitments. If their business is impacted or destroyed through flooding or other climate related event, they may have an inability to repay debt, therefore increasing credit costs, and a decrease in future relationship opportunities. U.S. Bancorp attempts to evaluate customer relationships in relation to recent trends through our risk management processes. A natural disaster dashboard has been created to track financial impact to our operations and credit portfolios from past events and evaluate the potential impact of additional disasters. Stress testing scenarios have also been created that incorporate increased frequency and severity of natural disasters and to incorporate these scenarios into capital planning considerations.
Chronic physical	Relevant, always included	Similar to acute physical occurrences, chronic shifts caused by climate change can also affect our customers and their ability to fulfil commitments, as well as a decrease in future relationship opportunities. Our Treasurer's Office and Risk Management & Compliance groups have leveraged scenarios to stress test our exposure against various risks, including those related to climate-change. Changes in temperature extremes will also lead to an increase in energy use to heat and cool U.S. Bancorp's over 2,300 locations. U.S. Bancorp has several locations in the Western/ Southwestern United States, in cities such as Las Vegas, Phoenix, San Diego and Los Angeles. With temperatures continuing to rise, especially in the desert climates, our locations in these areas will require a continually higher level of cooling. U.S. Bancorp is headquartered in Minneapolis, a traditionally cool city, and has a large presence in other northern locations, such as Milwaukee. These locations do not usually require a high level of cooling, but with increasingly warmer weather, they now require more use of air conditioning units, resulting in higher costs and emissions. In 2021, U.S. Bancorp spent approximately \$58 million on energy to operate our over 2,300 locations. If extreme temperatures worsen, these costs will increase the level of capital needed to operate our facilities.

C-FS2.2b

**(C-FS2.2b) Do you assess your portfolio's exposure to climate-related risks and opportunities?**

	We assess the portfolio's exposure	Explain why your portfolio's exposure is not assessed and your plans to address this in the future
Banking (Bank)	Yes	<Not Applicable>
Investing (Asset manager)	<Not Applicable>	<Not Applicable>
Investing (Asset owner)	<Not Applicable>	<Not Applicable>
Insurance underwriting (Insurance company)	<Not Applicable>	<Not Applicable>

C-FS2.2c

**(C-FS2.2c) Describe how you assess your portfolio's exposure to climate-related risks and opportunities.**

	Type of risk management process	Proportion of portfolio covered by risk management process	Type of assessment	Time horizon(s) covered	Tools and methods used	Provide the rationale for implementing this process to assess your portfolio's exposure to climate-related risks and opportunities
Banking (Bank)	Integrated into multi-disciplinary company-wide risk management process		Qualitative and quantitative	Short-term Medium-term Long-term	Please select	We are focusing on integrating climate risk into our existing risk management framework, with action plans in place to focus on qualitative and quantitative elements, recognizing the challenges with data quality and availability, while building foundational elements that will support short-term and long-term objectives.
Investing (Asset manager)	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Investing (Asset owner)	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Insurance underwriting (Insurance company)	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

**C-FS2.2d**

**(C-FS2.2d) Does your organization consider climate-related information about your clients/investees as part of your due diligence and/or risk assessment process?**

	We consider climate-related information	Explain why you do not consider climate-related information and your plans to address this in the future
Banking (Bank)	Yes	<Not Applicable>
Investing (Asset manager)	<Not Applicable>	<Not Applicable>
Investing (Asset owner)	<Not Applicable>	<Not Applicable>
Insurance underwriting (Insurance company)	<Not Applicable>	<Not Applicable>

**C-FS2.2e**

**(C-FS2.2e) Indicate the climate-related information your organization considers about clients/investees as part of your due diligence and/or risk assessment process, and how this influences decision-making.**

**Portfolio**

Banking (Bank)

**Type of climate-related information considered**

Climate transition plans

Other, please specify (Policies and procedures to reduce the company's impact on the environment. )

**Process through which information is obtained**

Directly from the client/investee

Public data sources

**Industry sector(s) covered by due diligence and/or risk assessment process**

Energy

Materials

Utilities

Other, please specify (Forestry)

**State how this climate-related information influences your decision-making**

Our approach to risk is founded in collaboration. Our risk managers and business lines work together to monitor, assess and act on risks associated with the company's relationships, including reputation risk. Impacts are assessed to determine appropriate risk mitigation actions. We also understand that our external relationships reflect on us. Before entering a new relationship – or expanding an existing one – business lines may be required to document and mitigate potential risks. Only then will the relationship receive approval, and only if the risk mitigation activities specifically address the risk associated with the relationship. Mitigation can include activities such as enhanced monitoring and periodic reviews. Once due diligence is complete, relationships with heightened risk are escalated through a formal approval process that may require review by business line and risk executives, including the Chief Risk Officer and other Managing Committee members, as appropriate. Instances of non-adherence or violations to the policy are monitored and may be factored into incentive compensation decisions.

**C2.3**

**(C2.3) Have you identified any inherent climate-related risks with the potential to have a substantive financial or strategic impact on your business?**

Yes

**C2.3a**

**(C2.3a) Provide details of risks identified with the potential to have a substantive financial or strategic impact on your business.**

**Identifier**

Risk 1

**Where in the value chain does the risk driver occur?**

Direct operations

**Risk type & Primary climate-related risk driver**

Chronic physical	Changing temperature (air, freshwater, marine water)
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**Primary potential financial impact**

Increased indirect (operating) costs

**Climate risk type mapped to traditional financial services industry risk classification**

Operational risk

**Company-specific description**

In 2021, U.S. Bancorp spent approximately \$58 million on energy to operate our over 2,300 locations. Rising temperatures will mean air conditioners will run more frequently, causing this cost to increase. U.S. Bancorp has several locations in the Western/ Southwestern United States, in cities such as Las Vegas, Phoenix, San Diego and Los Angeles. With temperatures continuing to rise, especially in the desert climates, our locations in these areas will require a continually higher level of cooling. U.S. Bancorp is headquartered in Minneapolis, a traditionally cool city on average, and has a large presence in other northern locations, such as Milwaukee. These locations do not usually require a high level of cooling, but with increasingly warmer weather, they now utilize greater levels of air conditioning, resulting in higher emissions and costs. In addition, enhanced oversight on third parties operating in geopolitical higher risk countries was initiated in 2019. Monitoring has expanded to include third party concentration in warm climates, which could pose operational impact in the event of natural disasters causing service disruptions. By third quarter 2022, we expect executive reporting to be available to support strategic outsourcing decisions such as diversification of third-party geographical locations as well as increase internal operational resiliency.

**Time horizon**

Short-term

**Likelihood**

Virtually certain

**Magnitude of impact**

Low

**Are you able to provide a potential financial impact figure?**

Yes, a single figure estimate

**Potential financial impact figure (currency)**

580000

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact figure**

We estimate that we could see up to an annual 1% increase in our energy cost due to increased temperatures across our footprint and an increased need to cool U.S. Bancorp's over 2,300 buildings. One percent (\$580,000) is an estimate and might vary.

**Cost of response to risk**

**Description of response and explanation of cost calculation**

In an effort to mitigate this risk, we are working to upgrade our facilities to be more energy efficient. Examples of this are installations of motion sensor lighting, building all new branch locations to energy efficient standards, switching out light bulbs/fixtures to more efficient options, etc. We completed 18 projects in 2021, mostly LED upgrades, including several large buildings in Missouri, Wisconsin and Minnesota, where the expected impact is an annual reduction of nearly 2,600 MWh of electrical energy. U.S. Bancorp's annual budget for energy efficient projects is \$2 million. This amount was established with our GHG reduction target as necessary annually to cover the energy reduction portion based on past efficiency project performance. The impact of that amount assumes that we continue to see the same energy savings going forward that we have seen in the past. This is considered the "cost of management" because the full amount is dedicated to reducing the energy use of U.S. Bancorp buildings to minimize the effect increased energy prices might have on operational costs.

**Comment**

---

**Identifier**

Risk 2

**Where in the value chain does the risk driver occur?**

Banking portfolio

**Risk type & Primary climate-related risk driver**

Chronic physical	Changing precipitation patterns and types (rain, hail, snow/ice)
------------------	--

**Primary potential financial impact**

Devaluation of collateral and potential for stranded, illiquid assets

**Climate risk type mapped to traditional financial services industry risk classification**

Credit risk

**Company-specific description**

U.S. Bank's Risk Management Team completes a financial impact assessment following climate-related natural disaster events. These events are tracked on a consolidated report, called the U.S. Bank Natural Disaster Dashboard. Examples of recent climate-related events tracked on the dashboard include hurricanes, floods and fires. Data tracked include operational expenses, credit expenses, impact on revenue and other expenses from these events - the data points are all pulled from existing risk management processes that help U.S. Bank manage these risks from all types of emerging and mature risks, including climate risk. Specific examples include past hurricanes in the southeast when we experienced a negative financial impact due to forgiven interest, increased loss provision expense and reduced revenue. The forgiven



interest was an effort to lighten the stress of our customers following such a devastating loss. This was also done following the devastating fires in California due to increasingly dry conditions in that region. Because U.S. Bank has a larger presence in California than in the southeast portion of the United States, the loss provision expense set aside due to this disaster was greater. Because of U.S. Bank's geographic footprint and location of credit portfolio concentrations, i.e. Midwest vs. Southeast U.S., we are not exposed to significant losses from sea level rising or the increased severity and frequency of hurricanes. U.S. Bank commissioned an outside consultant to complete a heatmap assessment of portfolio level potential climate risk exposure by industry. The heatmap assessment is intended to facilitate priorities for physical climate-related risk mitigation. The industries providing highest exposure include oil, conventional power, auto manufacturing and airline operations.

**Time horizon**

Short-term

**Likelihood**

Virtually certain

**Magnitude of impact**

Medium

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact figure**

U.S. Bank is currently tracking financial impact of historical climate related events in an effort to inform risk management around future events. We have begun estimating potential future financial impact but are not at a point where we are able to disclose this information.

**Cost of response to risk**

0

**Description of response and explanation of cost calculation**

Customer Segments that are more sensitive to flooding and other climate change impacts are evaluated more closely by location and risk management processes are in place to limit impact. Impacts of increased severity and frequency of natural disasters are assessed through our ongoing stress testing and climate scenario analysis processes, including those using the Comprehensive Capital Analysis and Review (CCAR) framework. Data on historical natural disasters and stress testing results have been shared with the Capital Planning Committee of U.S. Bancorp's Board of Directors. Results are used to assess and evaluate exposure to certain industries or regions based on risk related to climate related events. There is no additional cost for management due to the risk being managed by staff who are employed in roles with a primary focus other than environmental risk. Climate change risk is being integrated into those other roles that are part of the overall risk management structure.

**Comment**

**Identifier**

Risk 3

**Where in the value chain does the risk driver occur?**

Other parts of the value chain

**Risk type & Primary climate-related risk driver**

Reputation	Increased stakeholder concern or negative stakeholder feedback
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**Primary potential financial impact**

Decreased revenues due to reduced demand for products and services

**Climate risk type mapped to traditional financial services industry risk classification**

Reputational risk

**Company-specific description**

U.S. Bancorp embraces a balanced approach to addressing any potential ESG impact on our communities, customers, employees, and shareholders. Our risk management process is designed to help us appropriately manage the risk associated with serving our customers, including those in higher-risk industries. Our Environmental and Social Risk Policy provides an enterprise approach to managing and overseeing risks associated with the company's relationships, including, but not limited to, legal reputational, regulatory, and financial risks. In addition to the diligence performed on all customers, enhanced due diligence applies to all prospective and existing customers that operate within environmentally sensitive industries and which meet specific credit thresholds. This due diligence includes past and present compliance with applicable environmental laws and the customer's framework for management of environmental risks.

**Time horizon**

Medium-term

**Likelihood**

More likely than not

**Magnitude of impact**

Low

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact figure**

To date, we have not seen a financial impact based on recent experience and research into the role environment plays in customer choices for doing business. We seek to manage environmental risks associated with our higher impact customers in an effort to reduce risk to U.S. Bank.

**Cost of response to risk****Description of response and explanation of cost calculation**

U.S. Bancorp strives to be responsible stewards of the environment, so even though the financial impact of reputation risk is minimal, we work hard to tell our positive story around environmental responsibility and to mitigate any negative exposure risk. With an increase in potential reputation risk appearing with certain customers or industries, it became necessary for us to create a streamlined evaluation process to address this risk. Our Reputation Risk Management program includes a formal escalation process through the Chief Risk Officer and other Managing Committee members, as appropriate. We've also enhanced our approach on assessing climate risk; we have established an Environmental, Social and Governance Committee, Relationship Review Working Group, and a Climate Risk Working Group to share, monitor, and report on relevant reputation and financial risks. Each are comprised of senior leaders across company.

**Comment****C2.4****(C2.4) Have you identified any climate-related opportunities with the potential to have a substantive financial or strategic impact on your business?**

Yes

**C2.4a****(C2.4a) Provide details of opportunities identified with the potential to have a substantive financial or strategic impact on your business.****Identifier**

Opp1

**Where in the value chain does the opportunity occur?**

Banking portfolio

**Opportunity type**

Products and services

**Primary climate-related opportunity driver**

Development and/or expansion of low emission goods and services

**Primary potential financial impact**

Increased revenues resulting from increased demand for products and services

**Company-specific description**

A shift to a low carbon economy could lead to an increase in programs such as the federal tax credit program and community solar gardens. U.S. Bancorp is a national leader in financing renewable energy which makes communities more environmentally sustainable as well as more economically resilient through access to affordable energy and the promotion of job growth. At U.S. Bancorp, we are committed to investing in businesses that are supporting renewable energy efforts and sustainable business practices while supporting job growth. U.S. Bancorp Community Development Corporation (USB CDC) has experts who specialize in renewable energy investing and are seen as leaders in this space. Part of their work includes finding opportunities that drive a clean economy, but also support the communities where we do business.

**Time horizon**

Short-term

**Likelihood**

About as likely as not

**Magnitude of impact**

Medium

**Are you able to provide a potential financial impact figure?**

Yes, a single figure estimate

**Potential financial impact figure (currency)**

249000000

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact figure**

In 2021, USB CDC invested over \$830 million in renewable energy through tax credits. If these projects are expanded, we would have several more opportunities to significantly increase the dollar amount invested in renewable energy programs, especially community solar gardens. Because U.S. Bancorp is a leader in this space, we estimate an increase of 30% in our tax credit investment business based on historical activity (\$249,000,000 annually).

**Cost to realize opportunity**

2700000

**Strategy to realize opportunity and explanation of cost calculation**

Cost of management would be personnel costs associated with the renewable energy group within USB CDC, totaling approximately \$2.7 million. Because USB CDC is responsible for the success of our renewable energy tax credit business, we calculate the cost to manage as the personnel costs for each member of that team combined.

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**Comment****Identifier**

Opp2

**Where in the value chain does the opportunity occur?**

Banking portfolio

**Opportunity type**

Products and services

**Primary climate-related opportunity driver**

Development and/or expansion of low emission goods and services

**Primary potential financial impact**

Increased revenues through access to new and emerging markets

**Company-specific description**

U.S. Bancorp's CDC is a leader in the renewable energy investment tax credit space. In 2021, these investments totaled over \$830 million. Several customers have expressed a desire for U.S. Bank to meet their renewable energy debt needs in combination with the Renewable Energy Investment Tax Credit (REITC) investments. In order to meet customer demand as our customers make the transition to a low carbon economy, U.S. Bank developed a renewable energy debt product that went to market in 2021.

**Time horizon**

Short-term

**Likelihood**

More likely than not

**Magnitude of impact**

Medium

**Are you able to provide a potential financial impact figure?**

Yes, an estimated range

**Potential financial impact figure (currency)**

&lt;Not Applicable&gt;

**Potential financial impact figure – minimum (currency)**

6000000

**Potential financial impact figure – maximum (currency)**

25000000

**Explanation of financial impact figure**

Based on customer demand, if the product is offered, we estimate \$4 million-\$15 million in net interest income and \$2 million-\$10 million in fee revenue. Both fee revenue and net interest income can be generated from making loans to renewable energy projects. This would total between \$6 million and \$25 million potential new revenue.

**Cost to realize opportunity**

2700000

**Strategy to realize opportunity and explanation of cost calculation**

At U.S. Bancorp, we are committed to investing in businesses that are supporting renewable energy efforts and sustainable business practices while supporting job growth. USB CDC has experts who specialize in renewable energy investing and are seen as leaders in this space. Part of their work includes finding opportunities that drive a clean economy, but also support the communities where we do business. Their success in the tax credit space provides a level of expertise and structure that makes a smooth transition as we add a debt product. Having two options within the renewable energy space will allow us to make an even greater impact by supporting our customers more fully. Cost of management would be personnel costs associated with the renewable energy group within USB CDC, totaling approximately \$2.7M. Because USB CDC is responsible for the success of our tax credit business, as well as any future debt product, should it be approved, we calculate the cost to manage as the personnel costs for each member of that team combined.

**Comment**

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### C3. Business Strategy

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#### C3.1

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**(C3.1) Does your organization’s strategy include a transition plan that aligns with a 1.5°C world?**

Row 1

**Transition plan**

No, but our strategy has been influenced by climate-related risks and opportunities, and we are developing a transition plan within two years

**Publicly available transition plan**

<Not Applicable>

**Mechanism by which feedback is collected from shareholders on your transition plan**

<Not Applicable>

**Description of feedback mechanism**

<Not Applicable>

**Frequency of feedback collection**

<Not Applicable>

**Attach any relevant documents which detail your transition plan (optional)**

<Not Applicable>

**Explain why your organization does not have a transition plan that aligns with a 1.5°C world and any plans to develop one in the future**

We are working to develop a transition plan that aligns with a 1.5°C as part of our Net Zero commitment. We plan to have this developed within the next two years.

**Explain why climate-related risks and opportunities have not influenced your strategy**

<Not Applicable>

**C3.2**

**(C3.2) Does your organization use climate-related scenario analysis to inform its strategy?**

	Use of climate-related scenario analysis to inform strategy	Primary reason why your organization does not use climate-related scenario analysis to inform its strategy	Explain why your organization does not use climate-related scenario analysis to inform its strategy and any plans to use it in the future
Row 1	Yes, qualitative and quantitative	<Not Applicable>	<Not Applicable>

**C3.2a**

**(C3.2a) Provide details of your organization’s use of climate-related scenario analysis.**

Climate-related scenario	Scenario analysis coverage	Temperature alignment of scenario	Parameters, assumptions, analytical choices
Please select	Business division	<Not Applicable>	We use scenario analysis to understand the potential financial impact on the company of adverse events related to physical risks. Natural disasters have been identified as a risk through our risk identification/ assessment process. This risk was then incorporated into the scenario design and stress testing process in order to quantify the potential impact within a prior CCAR exercise. The results of this analysis supported our capital planning activities and allowed risk management to focus on the impact of future natural disasters from a financial risk viewpoint. We are also working with a vendor to perform an analysis on the impacts of severe natural disasters on our residential mortgage credit portfolio, focusing on 1-in-100-year events. With climate change increasing the frequency and/or severity of natural disasters, it is more important than ever that we understand how these occurrences affect our customers and the company. We are monitoring trends in the development and application of scenario analysis to both the physical and transition risks associated with climate change. Risks from these efforts will be documented in our Risk Identification Enterprise Risk Inventory accordingly.
Please select	Business activity	<Not Applicable>	We also use scenario analysis to understand the potential financial impact on the company due to transition risks. We have explored the PACTA for Banks tool to evaluate the alignment of our credit portfolio borrowers to different climate reference scenarios. In addition, the Climate Risk Team is working with Credit Risk and the Business Line to evaluate the impact of a hypothetical carbon tax on our Oil & Gas portfolio.

**C3.2b**

**(C3.2b) Provide details of the focal questions your organization seeks to address by using climate-related scenario analysis, and summarize the results with respect to these questions.**

Row 1

**Focal questions**

Yes, qualitative and quantitative

**Results of the climate-related scenario analysis with respect to the focal questions**

The new Climate Risk Management Framework includes credit risk specific activities for borrowers such as enhanced due diligence questionnaire for customers with potentially high environmental impacts.

**C3.3**

**(C3.3) Describe where and how climate-related risks and opportunities have influenced your strategy.**

	Have climate-related risks and opportunities influenced your strategy in this area?	Description of influence
Products and services	Yes	U.S. Bancorp Community Development Corporation (USBDCDC) is a leader in the renewable energy investment tax credit space. In 2021, these investments totaled over \$830 million. Several customers have expressed a desire for U.S. Bancorp to meet their renewable energy debt needs in combination with the Renewable Energy Tax Credit investments. In order to meet customer demand as our customers make the transition to a low carbon economy, U.S. Bancorp created a renewable energy debt product. The hope with adding this consideration to our renewable energy strategy is that we would be able to further solidify our leadership in this space and attract new customers. We anticipate a medium time horizon for the development of this product as it was recently approved. In December 2020, we established a full-service ESG practice within Fixed Income and Capital Markets (FICM). This new vertical is the natural evolution of our ESG financing efforts, which started with our first green bond underwriting in 2014, and has since grown to cover all Commercial Products, such as FICM activities, Supply Chain, Equipment Finance & Asset-Backed Finance. As businesses increasingly focus on ESG criteria, many companies are looking to address these themes through financing activities. By offering custom solutions, our advisory practice structures products that create the most significant impact on issues central to a company's ESG vision. The Commercial Products ESG team guides clients through ESG financing options from ideation to execution. After deal completion, the ESG Advisory team then works with clients to implement the ESG performance reporting. As new opportunities to invest and lend in the green economy emerge, we evaluate many of these potential products through a value-based prioritization process. Essentially, our process balances a product's net value to U.S. Bancorp (considering its alignment with our goals and financial benefits) with ease of implementation (considering resource requirements and conformity with our credit risk framework). We currently incorporate opportunities for Wealth Management and Investment Services clients to customize certain investment activities to align with their climate-related goals. We continue to evaluate the landscape of potential environmental finance activities that could help our customers transition to a low-carbon economy.
Supply chain and/or value chain	Yes	We continue to have discussions with U.S. Bancorp's suppliers around partnership opportunities to positively affect climate change. A short-term time horizon example of this is current work with Ricoh, our copy machine vendor, to right-size U.S. Bancorp's copier fleet in an effort to reduce energy use and paper use. This was a shift in strategy and involved considerable education for employees as we removed copiers from certain locations, causing employees to evaluate their printing habits. In addition, looking at a long-term time horizon, we monitor operational concentrations in areas with warm climates where we rely on third parties (including India), which is a consideration as we make strategic decisions related to outsourcing.
Investment in R&D	No	Because we are a financial services provider, our product offerings and any further development of these offerings are not greatly affected by climate change, due to their non-physical nature.
Operations	Yes	With climate change impacts and the need to better manage our energy use, our strategy is to continue to look for opportunities to purchase renewable energy for our facilities, such as our participation in Xcel Energy's Renewable Connect Program, as well as utilizing \$2 million of the Corporate Real Estate budget to reduce energy use at our facilities. In the long-term time horizon, this helped us reach our 2044 GHG reduction target.

**C3.4**

**(C3.4) Describe where and how climate-related risks and opportunities have influenced your financial planning.**

	Financial planning elements that have been influenced	Description of influence
Row 1	Direct costs Capital expenditures Capital allocation Acquisitions and divestments Assets Liabilities	Operating costs: Due to climate change causing fluctuations in energy regulations and prices affecting our operating costs, we are working to upgrade our facilities to be more energy efficient. Examples of this are installations of motion sensor lighting, building all new branch locations to high energy efficiency standards, switching out lights/fixtures to more efficient options, etc. We anticipate any future impact will be minimal because of the energy efficiency updates we have made and the fact that financial services, as an industry, are not as energy intensive as others. Capital expenditures / capital allocation: To better manage climate change impacts to our operations and reputation, U.S. Bancorp has increased the amount of capital directed towards these efforts. An example of this added expense is the planned hiring of an environmental strategy lead. This hire will allow us to better integrate climate risk across the organization for greater impact. The magnitude of impact for this opportunity is significant in that it will drive resources and support our environmental efforts. Acquisitions and divestments: Climate risk would be considered and reported through our annual CDP reporting process for new acquisitions and divestments, as part of our overall climate impact as a company. The magnitude of impact for this opportunity is minimal as other factors, such as market fit and strategy alignment are weighted more heavily with this activity. U.S. Bancorp would be able to address climate change risks at a later date following the acquisition or divestment activity. Assets: In an effort to mitigate climate change risk, we are working to upgrade our facilities to be more energy efficient. Examples of this are installations of motion sensor lighting, building all new branch locations to high energy efficiency standards, switching out lights/fixtures to more efficient options, etc. Liabilities: By tracking the financial impact of historical natural events caused by climate change, such as the recent hurricanes and fires, we have realized an impact due to increased write-offs and forgiven interest. The magnitude of impact is moderate for this risk due to the diversity of our customer portfolio and the highly regulated nature of our industry.

**C-FS3.6**

**(C-FS3.6) Does the policy framework for your portfolio activities include climate-related requirements for clients/investees, and/or exclusion policies?**

No, and we do not plan to include climate-related requirements and/or exclusion policies in our policy framework in the next two years

**C-FS3.6c**

**(C-FS3.6c) Why does the policy framework for your portfolio activities not include climate-related requirements for clients/investees, and/or exclusion policies?**

Although we do not have climate-related requirements or exclusion policies, our new Climate Risk Management Framework does include credit risk specific activities for borrowers such as enhanced due diligence questionnaire for customers with potentially high environmental impacts.

**C-FS3.8**

**(C-FS3.8) Does your organization include covenants in financing agreements to reflect and enforce your climate-related policies?**

	Climate-related covenants in financing agreements	Primary reason for not including climate-related covenants in financing agreements	Explain why your organization does not include climate-related covenants in financing agreements and your plans for the future
Row 1	No, and we do not plan to include climate-related covenants in the next two years	Other, please specify	We are working to expand sustainability linked loans to encourage clients to adopt more climate-friendly tactics that may positively benefit loan terms.

## C4. Targets and performance

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### C4.1

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#### (C4.1) Did you have an emissions target that was active in the reporting year?

Absolute target

### C4.1a

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#### (C4.1a) Provide details of your absolute emissions target(s) and progress made against those targets.

**Target reference number**

Abs 1

**Year target was set**

2016

**Target coverage**

Company-wide

**Scope(s)**

Scope 1

Scope 2

**Scope 2 accounting method**

Market-based

**Scope 3 category(ies)**

<Not Applicable>

**Base year**

2014

**Base year Scope 1 emissions covered by target (metric tons CO2e)**

60412

**Base year Scope 2 emissions covered by target (metric tons CO2e)**

354799

**Base year Scope 3 emissions covered by target (metric tons CO2e)**

<Not Applicable>

**Total base year emissions covered by target in all selected Scopes (metric tons CO2e)**

415211

**Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1**

100

**Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2**

100

**Base year Scope 3 emissions covered by target as % of total base year emissions in Scope 3 (in all Scope 3 categories)**

<Not Applicable>

**Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes**

100

**Target year**

2029

**Targeted reduction from base year (%)**

40

**Total emissions in target year covered by target in all selected Scopes (metric tons CO2e) [auto-calculated]**

249126.6

**Scope 1 emissions in reporting year covered by target (metric tons CO2e)**

41335

**Scope 2 emissions in reporting year covered by target (metric tons CO2e)**

97538

**Scope 3 emissions in reporting year covered by target (metric tons CO2e)**

<Not Applicable>

**Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)**

138873

**% of target achieved relative to base year [auto-calculated]**

166.384079419861

**Target status in reporting year**

Achieved

**Is this a science-based target?**

Yes, we consider this a science-based target, and the target is currently being reviewed by the Science Based Targets initiative

**Target ambition**

Well-below 2°C aligned

**Please explain target coverage and identify any exclusions**

We followed CDP recommendations to set two targets, one pre-2035 and one post-2035. We also followed the CDP guidance for targets to align with the science-based target framework since our industry does not qualify for science-based target certification.

**Plan for achieving target, and progress made to the end of the reporting year**

<Not Applicable>

**List the emissions reduction initiatives which contributed most to achieving this target**

Energy reduction projects (efficient lighting and HVAC) from a dedicated budget and renewable energy purchases contributed most.

---

**Target reference number**

Abs 2

**Year target was set**

2016

**Target coverage**

Company-wide

**Scope(s)**

Scope 1

Scope 2

**Scope 2 accounting method**

Market-based

**Scope 3 category(ies)**

<Not Applicable>

**Base year**

2014

**Base year Scope 1 emissions covered by target (metric tons CO2e)**

60412

**Base year Scope 2 emissions covered by target (metric tons CO2e)**

354799

**Base year Scope 3 emissions covered by target (metric tons CO2e)**

<Not Applicable>

**Total base year emissions covered by target in all selected Scopes (metric tons CO2e)**

415211

**Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1**

100

**Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2**

100

**Base year Scope 3 emissions covered by target as % of total base year emissions in Scope 3 (in all Scope 3 categories)**

<Not Applicable>

**Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes**

100

**Target year**

2044

**Targeted reduction from base year (%)**

60

**Total emissions in target year covered by target in all selected Scopes (metric tons CO2e) [auto-calculated]**

166084.4

**Scope 1 emissions in reporting year covered by target (metric tons CO2e)**

41335

**Scope 2 emissions in reporting year covered by target (metric tons CO2e)**

97538

**Scope 3 emissions in reporting year covered by target (metric tons CO2e)**

<Not Applicable>

**Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)**

138873

**% of target achieved relative to base year [auto-calculated]**

110.922719613241

**Target status in reporting year**

Achieved

**Is this a science-based target?**

Yes, we consider this a science-based target, and the target is currently being reviewed by the Science Based Targets initiative

**Target ambition**

Well-below 2°C aligned

**Please explain target coverage and identify any exclusions**

We followed CDP recommendations to set two targets, one pre-2035 and one post-2035. We also followed the CDP guidance for targets to align with the science-based target framework since our industry does not qualify for science-based target certification.

**Plan for achieving target, and progress made to the end of the reporting year**

<Not Applicable>

**List the emissions reduction initiatives which contributed most to achieving this target**

Energy reduction projects (efficient lighting and HVAC) from a dedicated budget and renewable energy purchases contributed most.

C4.2

**(C4.2) Did you have any other climate-related targets that were active in the reporting year?**

Net-zero target(s)

Other climate-related target(s)

C4.2b

**(C4.2b) Provide details of any other climate-related targets, including methane reduction targets.**

**Target reference number**

Oth 1

**Year target was set**

2021

**Target coverage**

Company-wide

**Target type: absolute or intensity**

Absolute

**Target type: category & Metric (target numerator if reporting an intensity target)**

Renewable fuel consumption	Percentage of total fuel consumption that is from renewable sources
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**Target denominator (intensity targets only)**

<Not Applicable>

**Base year**

**Figure or percentage in base year**

**Target year**

**Figure or percentage in target year**

**Figure or percentage in reporting year**

**% of target achieved relative to base year [auto-calculated]**

<Calculated field>

**Target status in reporting year**

Underway

**Is this target part of an emissions target?**

Yes, this target contributed to our early accomplishment of our 60% GHG emissions reduction by 2044, as well as part of our Net Zero commitment by 2050.

**Is this target part of an overarching initiative?**

Other, please specify (RE100)

**Please explain target coverage and identify any exclusions**

In 2021 we added an additional goal – by 2025 our goal is to source 100% renewable electricity within our operations.

**Plan for achieving target, and progress made to the end of the reporting year**

We plan to achieve this target through energy reduction efforts, purchasing renewable energy through our utility providers, and renewable energy credits (RECs) purchased as part of our renewable energy tax credit investing.

**List the actions which contributed most to achieving this target**

<Not Applicable>

C4.2c



**(C4.2c) Provide details of your net-zero target(s).**

**Target reference number**

NZ1

**Target coverage**

Company-wide

**Absolute/intensity emission target(s) linked to this net-zero target**

Int1

**Target year for achieving net zero**

2050

**Is this a science-based target?**

Yes, we consider this a science-based target, and we have committed to seek validation of this target by the Science Based Targets initiative in the next 2 years

**Please explain target coverage and identify any exclusions**

In November 2021 we set a goal to achieve net-zero GHG emissions by 2050. As part of our net-zero strategy we are working on 2030 interim targets for high emissions sectors, as well as our roadmap to get to 2050. This goal includes Scope 1, Scope 2, and Scope 3 emissions that we currently report, as well as financed emissions.

**Do you intend to neutralize any unabated emissions with permanent carbon removals at the target year?**

Unsure

**Planned milestones and/or near-term investments for neutralization at target year**

<Not Applicable>

**Planned actions to mitigate emissions beyond your value chain (optional)**

**C4.3**

**(C4.3) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.**

Yes

**C4.3a**

**(C4.3a) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.**

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Under investigation	62	2598
To be implemented*	33	1035
Implementation commenced*	41	1422
Implemented*	268	6321
Not to be implemented	19	411

**C4.3b**

**(C4.3b) Provide details on the initiatives implemented in the reporting year in the table below.**

**Initiative category & Initiative type**

Energy efficiency in buildings	Heating, Ventilation and Air Conditioning (HVAC)
--------------------------------	--

**Estimated annual CO2e savings (metric tonnes CO2e)**

3776

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 2 (market-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

514888

**Investment required (unit currency – as specified in C0.4)**

17162921

**Payback period**

>25 years

**Estimated lifetime of the initiative**

16-20 years

**Comment**

**Initiative category & Initiative type**

Energy efficiency in buildings	Lighting
--------------------------------	----------

**Estimated annual CO2e savings (metric tonnes CO2e)**

2547

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 2 (market-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

322166

**Investment required (unit currency – as specified in C0.4)**

1854095

**Payback period**

4-10 years

**Estimated lifetime of the initiative**

16-20 years

**Comment**

---

**Initiative category & Initiative type**

Energy efficiency in buildings	Insulation
--------------------------------	------------

**Estimated annual CO2e savings (metric tonnes CO2e)**

724

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 2 (market-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

136008

**Investment required (unit currency – as specified in C0.4)**

10055199

**Payback period**

>25 years

**Estimated lifetime of the initiative**

21-30 years

**Comment**

---

**Initiative category & Initiative type**

Waste reduction and material circularity	Product or service design
--	---------------------------

**Estimated annual CO2e savings (metric tonnes CO2e)**

891

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 3 category 5: Waste generated in operations

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

0

**Investment required (unit currency – as specified in C0.4)**

0

**Payback period**

11-15 years

**Estimated lifetime of the initiative**

Ongoing

**Comment**

**(C4.3c) What methods do you use to drive investment in emissions reduction activities?**

Method	Comment
Dedicated budget for energy efficiency	U.S. Bancorp's Energy and Sustainability Manager within Corporate Real Estate has a dedicated budget for energy efficiency projects.
Internal incentives/recognition programs	U.S. Bancorp's facility managers have access to reporting for the lowest performing locations within their portfolio. They are incentivized and/or recognized for reducing the energy use/emissions at those low performing locations.
Employee engagement	U.S. Bank's Environmental Program Manager is responsible for employee education and engagement across the enterprise. This includes sharing tips and information via internal collaboration sites and hosting educational calls available to all employees. Employees are encouraged to share ideas via email contacts and employee blog for how we can become more energy efficient as a company. U.S. Bank encourages employee engagement via a network of business resource groups. We have integrated our environmental work into the Development Network by adding a new position to each chapter.

**C-FS4.5**

**(C-FS4.5) Do any of your existing products and services enable clients to mitigate and/or adapt to the effects of climate change?**

Yes

**C-FS4.5a**

**(C-FS4.5a) Provide details of your existing products and services that enable clients to mitigate and/or adapt to climate change, including any taxonomy used to classify the products(s).**

**Product type/Asset class/Line of business**

Banking	Other, please specify (Reclaimed Ocean Bound Plastic Debit Cards)
---------	---

**Taxonomy or methodology used to classify product**

Please select

**Description of product**

Customers want products and services that don't make them choose between living sustainably and living their lives. In 2021 we started issuing a debit card made of reclaimed ocean-bound plastic. Every time one of our customers uses their Second Wave card, they're part of the process of removing damaging plastics that would end up in our oceans and remain for hundreds of years. We also recognize that environmental impact is a complicated issue with social and economic dimensions that often go unseen. To address these interdependencies, we partnered with First Mile, an organization that's working to create a responsible and sustainable supply chain in underdeveloped countries like Haiti. Through First Mile, Haitians can find meaningful work, a living wage and take part in recycling plastic waste that would otherwise be bound for the Caribbean Sea. First Mile also reinvests in the economic success of these communities through WORK, its non-profit organization that supports initiatives like youth education programs and micro loans for entrepreneurs.

**Product enables clients to mitigate and/or adapt to climate change**

Mitigation

**Portfolio value (unit currency – as specified in C0.4)**

% of total portfolio value

**Type of activity financed/insured or provided**

Other, please specify (Nature Protection)

**Product type/Asset class/Line of business**

Banking	Other, please specify (Full-service ESG practice within Commercial Products)
---------	--

**Taxonomy or methodology used to classify product**

Please select

**Description of product**

This new vertical is the natural evolution of our ESG financing efforts, which started with our first green bond underwriting in 2014, and has since grown to cover all Commercial Products (i.e. FICM activities, Supply Chain, Equipment Finance and Asset-Backed Finance). The Commercial Products ESG Advisory Team was created for the purpose of assisting those companies which are increasingly focusing on ESG criteria, many companies are looking to address these themes through financing to address ESG goals and helping to match those companies with investors looking for ESG investment products. The team's goal is to offer products that will significantly impact issues central to a company's ESG vision, then to guide clients through ESG financing options from concept to execution, and finally, after deal completion, work with clients to monitor the ESG performance reporting with an eye toward helping clients to advance and meet their ESG goals going forward.

**Product enables clients to mitigate and/or adapt to climate change**

Adaptation

**Portfolio value (unit currency – as specified in C0.4)**

% of total portfolio value

**Type of activity financed/insured or provided**

Please select

## C5. Emissions methodology

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### C5.1

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**(C5.1) Is this your first year of reporting emissions data to CDP?**

No

### C5.1a

---

**(C5.1a) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?**

**Row 1**

**Has there been a structural change?**

No

**Name of organization(s) acquired, divested from, or merged with**

<Not Applicable>

**Details of structural change(s), including completion dates**

<Not Applicable>

### C5.1b

---

**(C5.1b) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?**

	Change(s) in methodology, boundary, and/or reporting year definition?	Details of methodology, boundary, and/or reporting year definition change(s)
Row 1	No	<Not Applicable>

### C5.2

---

**(C5.2) Provide your base year and base year emissions.**

**Scope 1**

**Base year start**

January 1 2014

**Base year end**

December 31 2014

**Base year emissions (metric tons CO<sub>2</sub>e)**

60412

**Comment**

To better account for emissions under a new leased site modeling methodology, U.S. Bancorp recalculated our CY2014 and CY2015 emissions. We have restated our baseline as CY2014 and the revised emissions figures for CY2014 are reported here.

**Scope 2 (location-based)**

**Base year start**

January 1 2014

**Base year end**

December 31 2014

**Base year emissions (metric tons CO<sub>2</sub>e)**

354799

**Comment**

To better account for emissions under a new leased site modeling methodology, U.S. Bancorp recalculated our CY2014 and CY2015 emissions. We have restated our baseline as CY2014 and the revised emissions figures for CY2014 are reported here.

**Scope 2 (market-based)**

**Base year start**

January 1 2014

**Base year end**

December 31 2014

**Base year emissions (metric tons CO2e)**

354799

**Comment**

To better account for emissions under a new leased site modeling methodology, U.S. Bancorp recalculated our CY2014 and CY2015 emissions. We have restated our baseline as CY2014 and the revised emissions figures for CY2014 are reported here.

**Scope 3 category 1: Purchased goods and services**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 2: Capital goods**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 4: Upstream transportation and distribution**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 5: Waste generated in operations**

**Base year start**

January 1 2014

**Base year end**

December 31 2014

**Base year emissions (metric tons CO2e)**

26387

**Comment**

**Scope 3 category 6: Business travel**

**Base year start**

January 1 2014

**Base year end**

December 31 2014

**Base year emissions (metric tons CO2e)**

24629

**Comment**

**Scope 3 category 7: Employee commuting**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 8: Upstream leased assets**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 9: Downstream transportation and distribution**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 10: Processing of sold products**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 11: Use of sold products**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 12: End of life treatment of sold products**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 13: Downstream leased assets**

**Base year start**

January 1 2014

**Base year end**

December 31 2014

**Base year emissions (metric tons CO2e)**

63399

**Comment**

**Scope 3 category 14: Franchises**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 15: Investments**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3: Other (upstream)**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3: Other (downstream)**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

C5.3

---

**(C5.3) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.**

Defra Environmental Reporting Guidelines: Including streamlined energy and carbon reporting guidance, 2019

ISO 14064-1

The Climate Registry: General Reporting Protocol

The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

The Greenhouse Gas Protocol: Scope 2 Guidance

US EPA Center for Corporate Climate Leadership: Direct Fugitive Emissions from Refrigeration, Air Conditioning, Fire Suppression, and Industrial Gases

US EPA Center for Corporate Climate Leadership: Direct Emissions from Mobile Combustion Sources

US EPA Emissions & Generation Resource Integrated Database (eGRID)

Other, please specify (IEA GHG Emissions from Electricity Generation, OECD/IEA, Paris, 2020. (Year 2018 data))

C6. Emissions data

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C6.1

---

**(C6.1) What were your organization's gross global Scope 1 emissions in metric tons CO2e?**

**Reporting year**

**Gross global Scope 1 emissions (metric tons CO2e)**

41335.3

**Start date**

<Not Applicable>

**End date**

<Not Applicable>

**Comment**

C6.2

---

**(C6.2) Describe your organization's approach to reporting Scope 2 emissions.**

**Row 1**

**Scope 2, location-based**

We are reporting a Scope 2, location-based figure

**Scope 2, market-based**

We are reporting a Scope 2, market-based figure

**Comment**

To improve GHG inventory completeness, accuracy and relevance U.S. Bancorp reports a Scope 2 market-based figure.

C6.3

---

**(C6.3) What were your organization's gross global Scope 2 emissions in metric tons CO2e?**

**Reporting year**

**Scope 2, location-based**

191918.7

**Scope 2, market-based (if applicable)**

97537.8

**Start date**

<Not Applicable>

**End date**

<Not Applicable>

**Comment**

## C6.4

---

(C6.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure?

Yes

## C6.4a

---

(C6.4a) Provide details of the sources of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure.

**Source**

ATMs (owned and operated independently of our facilities that are not yet reported)

**Relevance of Scope 1 emissions from this source**

Emissions are not relevant

**Relevance of location-based Scope 2 emissions from this source**

Emissions are not relevant

**Relevance of market-based Scope 2 emissions from this source (if applicable)**

Emissions are not relevant

**Explain why this source is excluded**

There are potentially ATMs with small energy consumption that are not being captured in our existing reporting, the emissions would be minimal and thus not relevant.

**Estimated percentage of total Scope 1+2 emissions this excluded source represents**

**Explain how you estimated the percentage of emissions this excluded source represents**

---

## C6.5

---

(C6.5) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.

**Purchased goods and services**

**Evaluation status**

Relevant, not yet calculated

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

U.S. Bank has not yet determined a reliable and accurate methodology for tracking and calculating emissions from purchased goods and services

**Capital goods**

**Evaluation status**

Relevant, not yet calculated

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

U.S. Bancorp has not yet determined a reliable and accurate methodology for tracking and calculating emissions from capital goods.



**Fuel-and-energy-related activities (not included in Scope 1 or 2)**

**Evaluation status**

Not relevant, explanation provided

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

U.S. Bancorp captures the bulk of fuel and energy related activities within Scope 1 and 2. These emissions would be de minimis in comparison to our Scope 1 and 2 fuel and energy emissions. Furthermore, U.S. Bancorp has limited ability to influence Scope 3 emissions within this category.

**Upstream transportation and distribution**

**Evaluation status**

Not relevant, explanation provided

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

As a financial services company, U.S. Bancorp produces a limited number of physical products that require upstream transportation. The estimated size of this Scope 3 category is therefore small relative to our total estimated Scope 3 emissions.

**Waste generated in operations**

**Evaluation status**

Relevant, calculated

**Emissions in reporting year (metric tons CO2e)**

7479.6

**Emissions calculation methodology**

Supplier-specific method

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

100

**Please explain**

**Business travel**

**Evaluation status**

Relevant, calculated

**Emissions in reporting year (metric tons CO2e)**

7302

**Emissions calculation methodology**

Supplier-specific method

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

100

**Please explain**

**Employee commuting**

**Evaluation status**

Relevant, calculated

**Emissions in reporting year (metric tons CO2e)**

29238.7

**Emissions calculation methodology**

Average data method

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

100

**Please explain**

## Upstream leased assets

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

Due to our organizational boundary definition for operational control under Scopes 1 and 2, upstream leased assets are incorporated in our Scopes 1 and 2 emissions inventories.

## Downstream transportation and distribution

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

As a financial services company, U.S. Bancorp produces a limited number of physical products that require downstream transportation. The estimated size of this Scope 3 category is therefore small relative to our total estimated Scope 3 emissions.

## Processing of sold products

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

As a financial services company, U.S. Bancorp produces a limited number of physical products that require processing. The estimated size of this Scope 3 category is therefore de minimis and not relevant to our Scope 3 emissions.

## Use of sold products

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

As a financial services company, U.S. Bancorp produces a limited number of physical products. Furthermore, there is a limited set of actions U.S. Bancorp could take to influence use of sold products (e.g., online banking portals) within Scope 3. The estimated size of this Scope 3 category is therefore de minimis and not relevant to our Scope 3 emissions.

## End of life treatment of sold products

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

As a financial services company, U.S. Bancorp produces a limited number of physical products. Furthermore, there is a limited set of actions U.S. Bancorp could take to influence end of life treatment of sold products within Scope 3. The estimated size of this Scope 3 category is therefore de minimis and not relevant to our Scope 3 emissions.

**Downstream leased assets**

**Evaluation status**

Relevant, calculated

**Emissions in reporting year (metric tons CO2e)**

38777.1

**Emissions calculation methodology**

Supplier-specific method

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

100

**Please explain**

**Franchises**

**Evaluation status**

Not relevant, explanation provided

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

U.S. Bancorp does not operate any franchises. Therefore, this category is not relevant.

**Other (upstream)**

**Evaluation status**

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

**Other (downstream)**

**Evaluation status**

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

C6.10

---

(C6.10) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

**Intensity figure**

0.00000608

**Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)**

138873.2

**Metric denominator**

unit total revenue

**Metric denominator: Unit total**

2282700000

**Scope 2 figure used**

Market-based

**% change from previous year**

26.5

**Direction of change**

Decreased

**Reason for change**

This decrease is primarily due to a combination of our emissions reduction activities reported in C4.3b and the impact of emissions factor changes, particularly those for electricity. Our emissions reduction initiatives focused on energy retrofits and efficiency upgrades that help decouple GHG emissions from revenue growth.

---

**Intensity figure**

0.00684886

**Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)**

138873.2

**Metric denominator**

square foot

**Metric denominator: Unit total**

27444168

**Scope 2 figure used**

Market-based

**% change from previous year**

26.1

**Direction of change**

Decreased

**Reason for change**

This decrease is primarily due to a combination of our emissions reduction activities reported in C4.3b and the impact of emissions factor changes, particularly those for electricity. Our emissions reduction initiatives focused on energy retrofits and efficiency upgrades that help decouple GHG emissions from revenue growth.

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## C7. Emissions breakdowns

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### C7.9

(C7.9) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Decreased

---

### C7.9a

**(C7.9a) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.**

	Change in emissions (metric tons CO2e)	Direction of change	Emissions value (percentage)	Please explain calculation
Change in renewable energy consumption	27287	Decreased	14.1	The change in emissions from the previous year due to the change in renewable energy consumption was -27,287 MTCO2e. The previous year's Scope 1 and 2 market-based emissions were 193,138 MTCO2e, therefore we arrived at -14.1% through the calculation: $(-27,287 / 193,138) * 100 = -14.1\%$
Other emissions reduction activities	6089	Decreased	3.2	The change in emissions from the previous year due to emissions reduction activities was -6,089 MTCO2e. The previous year's Scope 1 and 2 market-based emissions were 193,138 MTCO2e, therefore we arrived at -3.2% through the calculation: $(-6,089 / 193,138) * 100 = -3.2\%$
Divestment		<Not Applicable >		
Acquisitions		<Not Applicable >		
Mergers		<Not Applicable >		
Change in output		<Not Applicable >		
Change in methodology	18784	Decreased	9.7	The change in emissions from the previous year due to updated emission factors was -18,784 MTCO2e. The previous year's Scope 1 and 2 market-based emissions were 193,138 MTCO2e, therefore we arrived at -9.7% through the calculation: $(-18,784 / 193,138) * 100 = -9.7\%$
Change in boundary		<Not Applicable >		
Change in physical operating conditions		<Not Applicable >		
Unidentified	2534	Decreased	1.3	The change in emissions from the previous year due to other unidentified factors was -2,534 MTCO2e. The previous year's Scope 1 and 2 market-based emissions were 193,138 MTCO2e, therefore we arrived at -1.3% through the calculation: $(-2,534 / 193,138) * 100 = -1.3\%$
Other		<Not Applicable >		

## C7.9b

**(C7.9b) Are your emissions performance calculations in C7.9 and C7.9a based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?**

Market-based

## C8. Energy

### C8.1

**(C8.1) What percentage of your total operational spend in the reporting year was on energy?**

More than 0% but less than or equal to 5%

### C8.2

**(C8.2) Select which energy-related activities your organization has undertaken.**

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Yes
Consumption of purchased or acquired electricity	Yes
Consumption of purchased or acquired heat	No
Consumption of purchased or acquired steam	Yes
Consumption of purchased or acquired cooling	Yes
Generation of electricity, heat, steam, or cooling	No

### C8.2a

**(C8.2a) Report your organization's energy consumption totals (excluding feedstocks) in MWh.**

	Heating value	MWh from renewable sources	MWh from non-renewable sources	Total (renewable and non-renewable) MWh
Consumption of fuel (excluding feedstock)	HHV (higher heating value)	0	216203.6	216203.6
Consumption of purchased or acquired electricity	<Not Applicable>	214800.3	222632.3	437432.6
Consumption of purchased or acquired heat	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of purchased or acquired steam	<Not Applicable>	0	24918.9	24918.9
Consumption of purchased or acquired cooling	<Not Applicable>	0	9615.8	9615.8
Consumption of self-generated non-fuel renewable energy	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Total energy consumption	<Not Applicable>	214800.3	473370.6	688170.8

**C8.2g**

**(C8.2g) Provide a breakdown of your non-fuel energy consumption by country.**

**Country/area**

Belgium

**Consumption of electricity (MWh)**

3

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

3

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

**Country/area**

Canada

**Consumption of electricity (MWh)**

506

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

506

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

**Country/area**

Germany

**Consumption of electricity (MWh)**

798

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

798

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

**Country/area**

Ireland

**Consumption of electricity (MWh)**

2700

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

2700

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

**Country/area**

Lithuania

**Consumption of electricity (MWh)**

696

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

696

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Norway

**Consumption of electricity (MWh)**

129

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

129

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Poland

**Consumption of electricity (MWh)**

258

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

258

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Spain

**Consumption of electricity (MWh)**

150

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

150

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

United Kingdom of Great Britain and Northern Ireland

**Consumption of electricity (MWh)**

294

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

294

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

United States of America

**Consumption of electricity (MWh)**

431899

**Consumption of heat, steam, and cooling (MWh)**

34535

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

466434

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

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C9. Additional metrics

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C9.1

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(C9.1) Provide any additional climate-related metrics relevant to your business.

C10. Verification

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C10.1

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(C10.1) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Third-party verification or assurance process in place
Scope 3	Third-party verification or assurance process in place

C10.1a

---

(C10.1a) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

US Bank 2021 CDP Verification Statement\_Final.pdf

**Page/ section reference**

Page 2

**Relevant standard**

ISO14064-3

**Proportion of reported emissions verified (%)**

100

---

C10.1b

---



(C10.1b) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

**Scope 2 approach**

Scope 2 location-based

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

US Bank 2021 CDP Verification Statement\_Final.pdf

**Page/ section reference**

Page 2

**Relevant standard**

ISO14064-3

**Proportion of reported emissions verified (%)**

100

---

**Scope 2 approach**

Scope 2 market-based

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

US Bank 2021 CDP Verification Statement\_Final.pdf

**Page/ section reference**

Page 2

**Relevant standard**

ISO14064-3

**Proportion of reported emissions verified (%)**

100

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### C10.1c

---

(C10.1c) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

**Scope 3 category**

Scope 3: Waste generated in operations

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

US Bank 2021 CDP Verification Statement\_Final.pdf

**Page/section reference**

Page 2

**Relevant standard**

ISO14064-3

**Proportion of reported emissions verified (%)**

100

---

**Scope 3 category**

Scope 3: Business travel

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

---

**Type of verification or assurance**

Limited assurance

**Attach the statement**

US Bank 2021 CDP Verification Statement\_Final.pdf

**Page/section reference**

Page 2

**Relevant standard**

ISO14064-3

**Proportion of reported emissions verified (%)**

100

**Scope 3 category**

Scope 3: Employee commuting

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

US Bank 2021 CDP Verification Statement\_Final.pdf

**Page/section reference**

Page 2

**Relevant standard**

ISO14064-3

**Proportion of reported emissions verified (%)**

100

**Scope 3 category**

Scope 3: Downstream leased assets

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

US Bank 2021 CDP Verification Statement\_Final.pdf

**Page/section reference**

Page 2

**Relevant standard**

ISO14064-3

**Proportion of reported emissions verified (%)**

100

**C10.2****(C10.2) Do you verify any climate-related information reported in your CDP disclosure other than the emissions figures reported in C6.1, C6.3, and C6.5?**

Yes

**C10.2a****(C10.2a) Which data points within your CDP disclosure have been verified, and which verification standards were used?**

Disclosure module verification relates to	Data verified	Verification standard	Please explain
C4. Targets and performance	Year on year change in emissions (Scope 1)	ISO14064-3	Our verification included year on year change in emissions (Scope 1)
C4. Targets and performance	Year on year change in emissions (Scope 2)	ISO14064-3	Our verification included year on year change in emissions (Scope 2)
C4. Targets and performance	Change in Scope 1 emissions against a base year (not target related)	ISO14064-3	Our verification included change in scope 1 emissions against base year.
C4. Targets and performance	Change in Scope 2 emissions against a base year (not target related)	ISO14064-3	Our verification included change in scope 2 emissions against base year.

## C11. Carbon pricing

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### C11.2

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**(C11.2) Has your organization originated or purchased any project-based carbon credits within the reporting period?**

No

### C11.3

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**(C11.3) Does your organization use an internal price on carbon?**

No, and we do not currently anticipate doing so in the next two years

## C12. Engagement

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### C12.1

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**(C12.1) Do you engage with your value chain on climate-related issues?**

Yes, our suppliers

Yes, our customers/clients

Yes, other partners in the value chain

### C12.1a

---

**(C12.1a) Provide details of your climate-related supplier engagement strategy.**

**Type of engagement**

Information collection (understanding supplier behavior)

**Details of engagement**

Collect climate change and carbon information at least annually from suppliers

**% of suppliers by number**

**% total procurement spend (direct and indirect)**

**% of supplier-related Scope 3 emissions as reported in C6.5**

100

**Rationale for the coverage of your engagement**

U.S. Bancorp Procurement encourages business line consideration of supplier climate change programs, efforts, and actions as part of its overall sourcing program. Procurement is working on process and guidance changes to allow us to engage with a larger number of suppliers. Because many business lines manage specific supplier relationships outside of this process, engagement efforts have not yet reached those suppliers. We have increased our engagement each year in an effort to better understand our suppliers' environmental programs and leverage available programs to reduce our environmental impact. Additional rationale for engaging with the suppliers included above is materiality. The suppliers with whom we currently engage are ones that provide products or services that have an impact on the environment, such as business travel vendors or copy machine vendors. A large portion of our annual spend is on suppliers who provide a service, such as temporary employees, and therefore, have a much smaller environmental impact. We prioritize engagement based on programs in place that we can leverage in order to reduce our emissions or the emissions of our supplier and customers and based on largest impact to emissions. An example is partnering with our debit card vendor to create two new options for our customers that utilize reclaimed ocean-bound plastic. This lower impact product is part of their sustainability program that we were able to leverage after engaging with them to find out more. We prioritized this vendor because of the large relationship and high number of cards issued annually increasing the positive impact we are having on the environment.

**Impact of engagement, including measures of success**

In certain vendor selection processes, U.S. Bancorp engages with suppliers to discuss opportunities related to the goods and services being purchased. An example of this is working with our debit card vendor to create two debit card options that utilize reclaimed ocean-bound plastic. These cards have been very popular with customers, with many asking when we will expand the plastic into our other design options. Because of the success of these cards, we are currently evaluating possible next steps to expand the program. We measure success through tracking engagement around communication efforts, as well as cards issued compared to other designs. As we have looked for more ways to engage with suppliers, we have found some suppliers to be very interested in partnering with us to strengthen our sustainability efforts. One of our technology vendors engaged with us to share how the reclaimed ocean-bound plastic that is being used in our new debit cards is also being used in computers we purchase from them. This discussion led to further exploration on how U.S. Bancorp can leverage their other programs to strengthen our environmental efforts. We measure success quantitatively through number of suppliers with whom we engage and qualitatively through progress made to leverage programs in place by our suppliers within U.S. Bancorp to strengthen our environmental efforts.

**Comment**

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### C-FS12.1b

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**(C-FS12.1b) Give details of your climate-related engagement strategy with your clients.**

**Type of clients**

Customers/clients of Banks

**Type of engagement**

Education/information sharing

**Details of engagement**

Run an engagement campaign to educate clients about your climate change performance and strategy  
Share information about your products and relevant certification schemes (i.e. Energy STAR)

**% client-related Scope 3 emissions as reported in C-FS14.1a**

**Portfolio coverage (total or outstanding)**

**Rationale for the coverage of your engagement**

Other, please specify (We provide an e-newsletter to all debit card customers sharing news around U.S. Bancorp's environmental programs and products twice per year. )

**Impact of engagement, including measures of success**

We encourage our debit customers to choose the reclaimed ocean-bound plastic debit card if they have not already done so, and we thank those who already have one for the positive impact they are having.

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**C12.1d**

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**(C12.1d) Give details of your climate-related engagement strategy with other partners in the value chain.**

U.S. Bancorp's Environmental Program Manager engages regularly with industry peers via monthly meetings and other "as needed" group and individual calls and emails. This forum allows us to share best practices to identify and manage climate-related risks and opportunities. It allows us to collaborate and address climate issues as a group for a larger impact. As an industry, we are collaborating on solutions and strategies to keep up with an increase in reporting requirements around climate change. As part of the monthly roundtable, we have an opportunity to share candid feedback and hear from industry experts regarding developments around climate. As a result, we have been able to share information with U.S. Bancorp groups working internally to outline a process for how we could move forward with quantifying our financed emissions. In addition, several employees, including climate risk, environmental strategy, government relations and the legal regulatory group, have engaged as part of industry groups focused on climate matters. Members attend regular calls and provide feedback as a collective in response to particular regulatory inquiries and policies. 2021 provided several opportunities for U.S. Bancorp to add our voice to industry responses, particularly around climate disclosure.

**C12.3**

---

**(C12.3) Does your organization engage in activities that could either directly or indirectly influence policy, law, or regulation that may impact the climate?**

**Row 1**

**Direct or indirect engagement that could influence policy, law, or regulation that may impact the climate**

Yes, we engage indirectly through trade associations

**Does your organization have a public commitment or position statement to conduct your engagement activities in line with the goals of the Paris Agreement?**

No, and we do not plan to have one in the next two years

**Attach commitment or position statement(s)**

<Not Applicable>

**Describe the process(es) your organization has in place to ensure that your engagement activities are consistent with your overall climate change strategy**

Direct and indirect activities are reviewed and approved by a level of senior management not more than three levels removed from the CEO. Potential engagement opportunities are brought to the attention of our Environmental Program Manager who reviews them within the context of our Environmental and Social Risk Policy, as well as U.S. Bancorp's established environmental strategy. The Environmental Program Manager takes the opportunity to the appropriate business line partners, depending on the focus of the opportunity, for feedback. The ultimate decision is made in collaboration with the Executive Vice President, Chief Social Responsibility Officer and is reflective of U.S. Bancorp's climate change strategy and policy. As it relates to strategic planning and overall direction of our ESG efforts, activities would also be reviewed and approved by the ESG Committee and Climate Risk Working Group. Both are comprised of senior leaders representing business and enablement functions across the company.

**Primary reason for not engaging in activities that could directly or indirectly influence policy, law, or regulation that may impact the climate**

<Not Applicable>

**Explain why your organization does not engage in activities that could directly or indirectly influence policy, law, or regulation that may impact the climate**

<Not Applicable>

**C12.3b**

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**(C12.3b) Provide details of the trade associations your organization engages with which are likely to take a position on any policy, law or regulation that may impact the climate.**

**Trade association**

Other, please specify (American Bankers Association; Risk Management Association, Climate Risk Consortium; Bank Policy Institute)

**Is your organization's position on climate change consistent with theirs?**

Consistent

**Has your organization influenced, or is your organization attempting to influence their position?**

We are not attempting to influence their position

**State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)**

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**

**Describe the aim of your organization's funding**

<Not Applicable>

**Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?**

No, we have not evaluated

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**C12.4**

**(C12.4) Have you published information about your organization's response to climate change and GHG emissions performance for this reporting year in places other than in your CDP response? If so, please attach the publication(s).**

**Publication**

In voluntary communications

**Status**

Complete

**Attach the document**

ESG Report Link.docx

**Page/Section reference**

50-63

**Content elements**

Governance

Strategy

Risks & opportunities

Emissions figures

Emission targets

**Comment**

---

**C-FS12.5**

**(C-FS12.5) Indicate the collaborative frameworks, initiatives and/or commitments related to environmental issues for which you are a signatory/member.**

	Environmental collaborative framework, initiative and/or commitment	Describe your organization's role within each framework, initiative and/or commitment
Row 1	Partnership for Carbon Accounting Financials (PCAF) RE100 Task Force on Climate-related Financial Disclosures (TCFD)	

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**C14. Portfolio Impact**

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**C-FS14.0**

(C-FS14.0) For each portfolio activity, state the value of your financing and insurance of carbon-related assets in the reporting year.

**Lending to all carbon-related assets**

**Are you able to report a value for the carbon-related assets?**

No, but we plan to assess our portfolio's exposure in the next two years

**Value of the carbon-related assets in your portfolio (unit currency – as specified in C0.4)**

<Not Applicable>

**New loans advanced in reporting year (unit currency – as specified in C0.4)**

<Not Applicable>

**Total premium written in reporting year (unit currency – as specified in C0.4)**

<Not Applicable>

**Percentage of portfolio value comprised of carbon-related assets in reporting year**

<Not Applicable>

**Primary reason for not providing a value for the financing and/or insurance to carbon-related assets**

Other, please specify (We are currently building out a process that would allow us to quantify and report our portfolio's exposure. )

**Please explain why you are not providing a value for the financing and/or insurance to carbon-related assets and your plans for the future**

In 2021, we joined PCAF and have been working to understand and assess climate risk within our portfolio. This process takes time, and we anticipate sharing more data as we become comfortable with the process and results.

**Lending to coal**

**Are you able to report a value for the carbon-related assets?**

No, but we plan to assess our portfolio's exposure in the next two years

**Value of the carbon-related assets in your portfolio (unit currency – as specified in C0.4)**

<Not Applicable>

**New loans advanced in reporting year (unit currency – as specified in C0.4)**

<Not Applicable>

**Total premium written in reporting year (unit currency – as specified in C0.4)**

<Not Applicable>

**Percentage of portfolio value comprised of carbon-related assets in reporting year**

<Not Applicable>

**Primary reason for not providing a value for the financing and/or insurance to carbon-related assets**

Other, please specify (We are currently building out a process that would allow us to quantify and report our portfolio's exposure. )

**Please explain why you are not providing a value for the financing and/or insurance to carbon-related assets and your plans for the future**

In 2021, we joined PCAF and have been working to understand and assess climate risk within our portfolio. This process takes time, and we anticipate sharing more data as we become comfortable with the process and results.

**Lending to oil and gas**

**Are you able to report a value for the carbon-related assets?**

No, but we plan to assess our portfolio's exposure in the next two years

**Value of the carbon-related assets in your portfolio (unit currency – as specified in C0.4)**

<Not Applicable>

**New loans advanced in reporting year (unit currency – as specified in C0.4)**

<Not Applicable>

**Total premium written in reporting year (unit currency – as specified in C0.4)**

<Not Applicable>

**Percentage of portfolio value comprised of carbon-related assets in reporting year**

<Not Applicable>

**Primary reason for not providing a value for the financing and/or insurance to carbon-related assets**

Other, please specify (We are currently building out a process that would allow us to quantify and report our portfolio's exposure. )

**Please explain why you are not providing a value for the financing and/or insurance to carbon-related assets and your plans for the future**

In 2021, we joined PCAF and have been working to understand and assess climate risk within our portfolio. This process takes time, and we anticipate sharing more data as we become comfortable with the process and results.

C-FS14.1

---

**(C-FS14.1) Does your organization measure its portfolio impact on the climate?**

	We conduct analysis on our portfolio's impact on the climate	Disclosure metric	Please explain why you do not measure the impact of your portfolio on the climate
Banking (Bank)	No, but we plan to do so in the next two years	<Not Applicable >	We have identified several industries with high environmental impact, and clients in those industries are subject to an enhanced due diligence questionnaire which addresses their impact on the environment. We are making preliminary attempts at performing carbon footprint calculations on our lending portfolios using the Partnership for Carbon Accounting Financials (PCAF) methodology. This effort is helping us identify portfolio segments and sub-segments that can have a greater impact on the climate based on relatively higher emission intensities.
Investing (Asset manager)	<Not Applicable>	<Not Applicable >	<Not Applicable>
Investing (Asset owner)	<Not Applicable>	<Not Applicable >	<Not Applicable>
Insurance underwriting (Insurance company)	<Not Applicable>	<Not Applicable >	<Not Applicable>

**C-FS14.3**

**(C-FS14.3) Did your organization take any actions in the reporting year to align your portfolio with a 1.5°C world?**

	Actions taken to align our portfolio with a 1.5°C world	Please explain why you have not taken any action to align your portfolio with a 1.5°C world
Banking (Bank)	No, but we plan to in the next two years	We currently have concentration limits on the bank's exposure to the oil and gas sector and the utilities sector. We see a progression of this work within the next two years that will result in the development of a plan to align our portfolio to a well below 1.5-degree world.
Investing (Asset manager)	<Not Applicable>	<Not Applicable>
Investing (Asset owner)	<Not Applicable>	<Not Applicable>
Insurance underwriting (Insurance company)	<Not Applicable>	<Not Applicable>

**C15. Biodiversity**

**C15.1**

**(C15.1) Is there board-level oversight and/or executive management-level responsibility for biodiversity-related issues within your organization?**

	Board-level oversight and/or executive management-level responsibility for biodiversity-related issues	Description of oversight and objectives relating to biodiversity	Scope of board-level oversight
Row 1	No, and we do not plan to have both within the next two years	<Not Applicable>	<Not Applicable>

**C15.2**

**(C15.2) Has your organization made a public commitment and/or endorsed any initiatives related to biodiversity?**

	Indicate whether your organization made a public commitment or endorsed any initiatives related to biodiversity	Biodiversity-related public commitments	Initiatives endorsed
Row 1	No, and we do not plan to do so within the next 2 years	<Not Applicable>	<Not Applicable>

**C15.3**

**(C15.3) Does your organization assess the impact of its value chain on biodiversity?**

	Does your organization assess the impact of its value chain on biodiversity?	Portfolio
Row 1	No, and we do not plan to assess biodiversity-related impacts within the next two years	<Not Applicable>

**C15.4**

**(C15.4) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?**

	Have you taken any actions in the reporting period to progress your biodiversity-related commitments?	Type of action taken to progress biodiversity- related commitments
Row 1	No, and we do not plan to undertake any biodiversity-related actions	<Not Applicable>

**C15.5**

**(C15.5) Does your organization use biodiversity indicators to monitor performance across its activities?**

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
Row 1	No	Please select

**C15.6**

**(C15.6) Have you published information about your organization's response to biodiversity-related issues for this reporting year in places other than in your CDP response? If so, please attach the publication(s).**

Report type	Content elements	Attach the document and indicate where in the document the relevant biodiversity information is located
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**C16. Signoff**

**C-FI**

**(C-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.**

**C16.1**

**(C16.1) Provide details for the person that has signed off (approved) your CDP climate change response.**

	Job title	Corresponding job category
Row 1	Reba Dominski Executive Vice President and Chief Social Responsibility Officer	Business unit manager

**SC. Supply chain module**

**SC0.0**

**(SC0.0) If you would like to do so, please provide a separate introduction to this module.**

**SC0.1**

**(SC0.1) What is your company's annual revenue for the stated reporting period?**

	Annual Revenue
Row 1	22827000000

**SC1.1**

**(SC1.1) Allocate your emissions to your customers listed below according to the goods or services you have sold them in this reporting period.**

**SC1.2**

**(SC1.2) Where published information has been used in completing SC1.1, please provide a reference(s).**



SC1.3

**(SC1.3) What are the challenges in allocating emissions to different customers, and what would help you to overcome these challenges?**

Allocation challenges	Please explain what would help you overcome these challenges
Customer base is too large and diverse to accurately track emissions to the customer level	As a very large financial services provider with a large and diverse customer base, the majority of U.S. Bancorp's emissions result from our ongoing business operations. Our facilities, our technologies, and our employees all support various aspects of the services we provide and are not dedicated to one product or service or to one customer.

SC1.4

**(SC1.4) Do you plan to develop your capabilities to allocate emissions to your customers in the future?**

No

SC1.4b

**(SC1.4b) Explain why you do not plan to develop capabilities to allocate emissions to your customers.**

Due to the structure of U.S. Bank's operations and the nature of the products and services we provide, it is unlikely that there would be any accurate way to allocate emissions to the customer level.

SC2.1

**(SC2.1) Please propose any mutually beneficial climate-related projects you could collaborate on with specific CDP Supply Chain members.**

SC2.2

**(SC2.2) Have requests or initiatives by CDP Supply Chain members prompted your organization to take organizational-level emissions reduction initiatives?**

No

SC4.1

**(SC4.1) Are you providing product level data for your organization's goods or services?**

No, I am not providing data

FW-FS Forests and Water Security (FS only)

FW-FS1.1

**(FW-FS1.1) Is there board-level oversight of forests- and/or water-related issues within your organization?**

	Board-level oversight of this issue area	Explain why your organization does not have board-level oversight of this issue area and any plans to address this in the future
Forests	No, and we do not plan to in the next two years	Our Board has oversight of ESG, including environmental sustainability, so if we make commitments around forests or water in the future, the Board would have oversight of this work.
Water	No, and we do not plan to in the next two years	Our Board has oversight of ESG, including environmental sustainability, so if we make commitments around forests or water in the future, the Board would have oversight of this work.

FW-FS1.1c

**(FW-FS1.1c) Does your organization have at least one board member with competence on forests- and/or water-related issues?**

**Forests**

**Board member(s) have competence on this issue area**

No, and we do not plan to address this within the next two years

**Criteria used to assess competence of board member(s) on this issue area**

<Not Applicable>

**Primary reason for no board-level competence on this issue area**

Important but not an immediate priority

**Explain why your organization does not have at least one board member with competence on this issue area and any plans to address this in the future**

**Water**

**Board member(s) have competence on this issue area**

No, and we do not plan to address this within the next two years

**Criteria used to assess competence of board member(s) on this issue area**

<Not Applicable>

**Primary reason for no board-level competence on this issue area**

Important but not an immediate priority

**Explain why your organization does not have at least one board member with competence on this issue area and any plans to address this in the future**

**FW-FS1.2**

**(FW-FS1.2) Provide the highest management-level position(s) or committee(s) with responsibility for forests- and/or water-related issues.**

**FW-FS2.1**

**(FW-FS2.1) Do you assess your portfolio's exposure to forests- and/or water-related risks and opportunities?**

	We assess our portfolio's exposure to this issue area	Explain why your portfolio's exposure is not assessed for this issue area and any plans to address this in the future
Banking - Forests exposure	Yes	<Not Applicable>
Banking – Water exposure	No, and we do not plan to in the next two years	We continue to monitor water- related impacts and plan to consider assessing our portfolio exposure in the future.
Investing (Asset manager) – Forests exposure	<Not Applicable>	<Not Applicable>
Investing (Asset manager) – Water exposure	<Not Applicable>	<Not Applicable>
Investing (Asset owner) – Forests exposure	<Not Applicable>	<Not Applicable>
Investing (Asset owner) – Water exposure	<Not Applicable>	<Not Applicable>
Insurance underwriting – Forests exposure	<Not Applicable>	<Not Applicable>
Insurance underwriting – Water exposure	<Not Applicable>	<Not Applicable>

**FW-FS2.1a**

**(FW-FS2.1a) Describe how you assess your portfolio's exposure to forests- and/or water-related risks and opportunities.**

**Portfolio**

Banking (Bank)

**Exposure to**

Forests-related risks and opportunities

**Type of risk management process**

Integrated into multi-disciplinary company-wide risk management process

**Proportion of portfolio covered by risk management process**

**Type of assessment**

Qualitative only

**Time horizon(s) covered**

Please select

**Tools and methods used**

Internal tools/methods

**Provide the rationale for implementing this process to assess your portfolio's exposure to forests- and/or water-related risks and opportunities**

We require enhanced due diligence for customers in forestry industries that could face potential climate risk impacts or that could potentially have a negative impact on the environment.

FW-FS2.2

**(FW-FS2.2) Does your organization consider forests- and/or water-related information about clients/investees as part of its due diligence and/or risk assessment process?**

	We consider forests- and/or water-related information	Explain why information related to this issue area is not considered and any plans to address this in the future
Banking – Forests-related information	Yes	<Not Applicable>
Banking – Water-related information	Yes	<Not Applicable>
Investing (Asset manager) – Forests-related information	<Not Applicable>	<Not Applicable>
Investing (Asset manager) – Water-related information	<Not Applicable>	<Not Applicable>
Investing (Asset owner) – Forests-related information	<Not Applicable>	<Not Applicable>
Investing (Asset owner) – Water-related information	<Not Applicable>	<Not Applicable>
Insurance underwriting – Forests-related information	<Not Applicable>	<Not Applicable>
Insurance underwriting – Water-related information	<Not Applicable>	<Not Applicable>

FW-FS2.2a

**(FW-FS2.2a) Indicate the forests- and/or water-related information your organization considers about clients/investees as part of your due diligence and/or risk assessment process, and how this influences decision making.**

**Portfolio**

Please select

**Information related to**

Forests

**Type of information considered**

Scope and content of forests policy

**Process through which information is obtained**

Directly from the client/investee

**Industry sector(s) covered by due diligence and/or risk assessment process**

Other, please specify (Logging, wood products and other industries in the forestry business)

**State how these forests- and/or water-related information influences your decision making**

The due diligence and review requirements ensure a prospective or existing customer’s policies and processes are sound and effective as they relate to the environment and the community in which it operates. For customers in certain environmental industries or sectors, we require our commercial clients to be in compliance with all state and local, national and international environmental laws and will verify adherence to such laws through certification or due diligence, as appropriate. This additional environmental due diligence focuses, in part, on: - Past and present environmental compliance with laws and regulations. - Internal framework related to environmental risk management. - Potential impact on dependent communities and indigenous people. When evaluating relationships requiring additional due diligence, our Reputation Risk Management group partners with specialists across the company to ensure all pertinent risks are considered and evaluated. Among others, Reputation Risk Management may consult with the following risk and compliance partners, in addition to business lines, to consider all relevant aspects of a relationship when engaging or determining to maintain a relationship: ESG Program Office, Enterprise Financial Crimes Compliance, Credit Risk Management, the Law Division and Global Ethics Office.

**Portfolio**

Banking (Bank)

**Information related to**

Water

**Type of information considered**

Water withdrawn from water stressed areas  
 Water discharge treatment data  
 Breaches to local water regulations

**Process through which information is obtained**

Directly from the client/investee  
 Public data sources

**Industry sector(s) covered by due diligence and/or risk assessment process**

Other, please specify (Agriculture)

**State how these forests- and/or water-related information influences your decision making**

Our agricultural lending credit policy requires an assessment of water rights and environmental risks. Information collected during the application and due diligence is taken into account during the approval process.

FW-FS2.3

**(FW-FS2.3) Have you identified any inherent forests- and/or water-related risks in your portfolio with the potential to have a substantive financial or strategic impact on your business?**

	Risks identified for this issue area	Primary reason why your organization has not identified any substantive risks for this issue area	Explain why your organization has not identified any substantive risks for this issue area
Forests	No	Not yet evaluated	
Water	No	Not yet evaluated	

**FW-FS2.4**

**(FW-FS2.4) Have you identified any inherent forests- and/or water-related opportunities in your portfolio with the potential to have a substantive financial or strategic impact on your business?**

	Opportunities identified for this issue area	Primary reason why your organization has not identified any substantive opportunities for this issue area	Explain why your organization has not identified any substantive opportunities for this issue area
Forests	No	Not yet evaluated	
Water	No	Not yet evaluated	

**FW-FS3.1**

**(FW-FS3.1) Do you take forests- and/or water-related risks and opportunities into consideration in your organization’s strategy and/or financial planning?**

**Forests**

**Risks and opportunities related to this issue area taken into consideration in strategy and/or financial planning**

No, we do not take risks and opportunities into consideration

**Description of influence on organization’s strategy including own commitments**

<Not Applicable>

**Financial planning elements that have been influenced**

<Not Applicable>

**Description of influence on financial planning**

<Not Applicable>

**Explain why forests- and/or water-related risks and opportunities have not influenced your strategy and/or financial planning**

**Water**

**Risks and opportunities related to this issue area taken into consideration in strategy and/or financial planning**

No, we do not take risks and opportunities into consideration

**Description of influence on organization’s strategy including own commitments**

<Not Applicable>

**Financial planning elements that have been influenced**

<Not Applicable>

**Description of influence on financial planning**

<Not Applicable>

**Explain why forests- and/or water-related risks and opportunities have not influenced your strategy and/or financial planning**

**FW-FS3.2**

**(FW-FS3.2) Has your organization conducted any scenario analysis to identify forests- and/or water-related outcomes?**

**Forests**

**Scenario analysis conducted to identify outcomes for this issue area**

No, we have not conducted any scenario analysis to identify outcomes for this issue area, and we don't plan to in the next two years

**Type of scenario analysis used**

<Not Applicable>

**Parameters, assumptions, analytical choices**

<Not Applicable>

**Description of outcomes for this issue area**

<Not Applicable>

**Explain how the outcomes identified using scenario analysis have influenced your strategy**

<Not Applicable>

**Explain why your organization has not conducted scenario analysis for this issue area and any plans to address this in the future**

**Water**

**Scenario analysis conducted to identify outcomes for this issue area**

No, we have not conducted any scenario analysis to identify outcomes for this issue area, and we don't plan to in the next two years

**Type of scenario analysis used**

<Not Applicable>

**Parameters, assumptions, analytical choices**

<Not Applicable>

**Description of outcomes for this issue area**

<Not Applicable>

**Explain how the outcomes identified using scenario analysis have influenced your strategy**

<Not Applicable>

**Explain why your organization has not conducted scenario analysis for this issue area and any plans to address this in the future**

**FW-FS3.3**

**(FW-FS3.3) Do any of your existing products and services enable clients to mitigate deforestation and/or water insecurity?**

	Existing products and services that enable clients to mitigate deforestation and/or water insecurity	Explain why your organization does not offer products and services which enable clients to mitigate deforestation and/or water insecurity and any plans to address this in the future
Forests	No, and we do not plan to address this in the next two years	
Water	No, and we do not plan to address this in the next two years	

**FW-FS3.4**

**(FW-FS3.4) Does the policy framework for the portfolio activities of your organization include forests- and/or water-related requirements that clients/investees need to meet?**

	Policy framework includes this issue area	Explain why your organization does not include this issue area in the policy framework and any plans to address this in the future
Forests	Yes	<Not Applicable>
Water	No, and we do not plan to include this issue area in the next two years	We continue to monitor water- related impacts and plan to consider adding this to our policy framework in the future.

**FW-FS3.4a**

**(FW-FS3.4a) Provide details of the policies which include forests- and/or water-related requirements that clients/investees need to meet.**

**Portfolio**

Banking (Bank)

**Issue area(s) the policy covers**

Forests

**Type of policy**

Credit/lending policy  
Risk policy

**Portfolio coverage of policy**

**Policy availability**

Publicly available

**Attach documents relevant to your policy**

**Criteria required of clients/investees**

Have a documented forests policy  
Avoid negative impacts on threatened and protected species and habitats  
Commit to no conversion of High Conservation Value areas  
Have transparent and accessible mechanisms to resolve grievances and remediate any adverse impacts on indigenous people and local communities  
Comply with all applicable local, national and international laws and regulations

**Value chain stages of client/investee covered by criteria**

Direct operations only

**Timeframe for compliance with policy criteria**

Complying with criteria is a pre-requisite for business

**Industry sectors covered by the policy**

Other, please specify (Certain NAICS codes with a potential impact on forests and the environment)

**Forest risk commodities covered by the policy**

Timber products

**Forest risk commodity supply chain stage covered by the policy**

Production  
Processing  
Manufacturing

**Exceptions to policy based on**

<Not Applicable>

**Explain how criteria coverage and/or exceptions have been determined**

**FW-FS3.5**

**(FW-FS3.5) Does your organization include covenants in financing agreements to reflect and enforce your forests- and/or water-related policies?**

	Covenants included in financing agreements to reflect and enforce policies for this issue area	Explain how the covenants included in financing agreements relate to your policies for this issue area	Explain why your organization does not include covenants for this issue area in financing agreements and any plans to address this in the future
Forests	No, and we do not plan to in the next two years	<Not Applicable>	We are continuing to monitor forest impacts and plan to consider adding this to finance agreements in the future.
Water	No, and we do not plan to in the next two years	<Not Applicable>	We are continuing to monitor water related impacts and plan to consider adding this to finance agreements in the future.

**FW-FS4.1**

**(FW-FS4.1) Do you engage with your clients/investees on forests- and/or water-related issues?**

	We engage with clients/investees on this issue area	Explain why you do not engage with your clients/investees on the issue area and any plans to address this in the future
Clients – Forests	Yes	<Not Applicable>
Clients – Water	Yes	<Not Applicable>
Investees – Forests	<Not Applicable>	<Not Applicable>
Investees – Water	<Not Applicable>	<Not Applicable>

**FW-FS4.1a**

**(FW-FS4.1a) Give details of your forests- and/or water-related engagement strategy with your clients.**

**Type of clients**

Clients of Banks

**Issue area this engagement relates to**

Forests

**Type of engagement**

Education/information sharing

**Details of engagement**

Engage with clients on measuring exposure to forests-related risk

**Portfolio coverage of engagement**

**Rationale for the coverage of your engagement**

Engagement targeted at clients with increased forest-related risks

**Impact of engagement, including measures of success**

**FW-FS4.3**

**(FW-FS4.3) Does your organization provide financing and/or insurance to smallholders in the agricultural commodity supply chain?**

	Provide financing and/or insurance to smallholders in the agricultural commodity supply chain	Agricultural commodity	Primary reason for not providing finance and/or insurance to smallholders	Explain why your organization does not provide finance/insurance to smallholders and any plans to change this in the future
Row 1	Yes	Please select	<Not Applicable>	<Not Applicable>

**FW-FS4.4**

**(FW-FS4.4) Does your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may impact forests and/or water security?**

	Direct or indirect engagement that could influence policy, law, or regulation that may impact this issue area	Primary reason for not engaging in activities that could directly or indirectly influence policy, law, or regulation that may impact this issue area	Explain why you do not engage in activities that could directly or indirectly influence policy, law, or regulation that may impact this issue area
Forests	Yes, we engage indirectly through trade associations	<Not Applicable>	<Not Applicable>
Water	Yes, we engage indirectly through trade associations	<Not Applicable>	<Not Applicable>

**FW-FS5.1**

**(FW-FS5.1) Does your organization measure its portfolio impact on forests and/or water security?**

	We measure our portfolio impact on this issue area	Explain how your organization measures its portfolio impact on this issue area, including any metrics used to quantify impact	Primary reason for not measuring portfolio impact on this issue area	Explain why your organization does not measure its portfolio impact on this issue area and any plans to change this in the future
Banking – Impact on Forests	No, and we don't plan to in the next two years	<Not Applicable>	Important but not an immediate priority	
Banking – Impact on Water	No, and we don't plan to in the next two years	<Not Applicable>	Important but not an immediate priority	
Investing (Asset manager) – Impact on Forests	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Investing (Asset manager) – Impact on Water	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Investing (Asset owner) – Impact on Forests	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Investing (Asset owner) – Impact on Water	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Insurance underwriting – Impact on Forests	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Insurance underwriting – Impact on Water	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

**FW-FS5.2**

**(FW-FS5.2) Does your organization provide finance or insurance to companies operating in any stages of the following forest risk commodity supply chains, and are you able to report on the amount of finance/insurance provided?**

	Finance or insurance provided to companies operating in the supply chain for this commodity	Amount of finance/insurance provided will be reported	Explain why your organization is unable to report on the amount of finance/insurance provided for this commodity
Lending to companies operating in the timber products supply chain	Please select	<Not Applicable>	<Not Applicable>
Lending to companies operating in the palm oil products supply chain	Please select	<Not Applicable>	<Not Applicable>
Lending to companies operating in the cattle products supply chain	Please select	<Not Applicable>	<Not Applicable>
Lending to companies operating in the soy supply chain	Please select	<Not Applicable>	<Not Applicable>
Lending to companies operating in the rubber supply chain	Please select	<Not Applicable>	<Not Applicable>
Lending to companies operating in the cocoa supply chain	Please select	<Not Applicable>	<Not Applicable>
Lending to companies operating in the coffee supply chain	Please select	<Not Applicable>	<Not Applicable>
Investing (asset manager) to companies operating in the timber products supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Investing (asset manager) to companies operating in the palm oil products supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Investing (asset manager) to companies operating in the cattle products supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Investing (asset manager) to companies operating in the soy supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Investing (asset manager) to companies operating in the rubber supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Investing (asset manager) to companies operating in the cocoa supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Investing (asset manager) to companies operating in the coffee supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Investing (asset owner) to companies operating in the timber products supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Investing (asset owner) to companies operating in the palm oil products supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Investing (asset owner) to companies operating in the cattle products supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Investing (asset owner) to companies operating in the soy supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Investing (asset owner) to companies operating in the rubber supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Investing (asset owner) to companies operating in the cocoa supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Investing (asset owner) to companies operating in the coffee supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Insuring companies operating in the timber products supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Insuring companies operating in the palm oil products supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Insuring companies operating in the cattle products supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Insuring companies operating in the soy supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Insuring companies operating in the rubber supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Insuring companies operating in the cocoa supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Insuring companies operating in the coffee supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>

**FW-FS6.1**

**(FW-FS6.1) Have you published information about your organization’s response to forests- and/or water-related issues for this reporting year in places other than in your CDP response? If so, please attach the publication(s).**

**Submit your response**

**In which language are you submitting your response?**

English

**Please confirm how your response should be handled by CDP**

	I understand that my response will be shared with all requesting stakeholders	Response permission
Please select your submission options	Yes	Public



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