National Bank of Canada - Climate Change 2020

C0. Introduction

C0.1

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

National Bank of Canada offers integrated financial services to consumers, small and medium-sized enterprises (SMEs) and large corporations. It operates four lines of business— Personal and Commercial Banking, Wealth Management, Financial Markets, and U.S. Specialty Finance and International. National Bank provides a complete range of services, including banking and investment solutions for individuals and corporate clients, securities brokerage, insurance and wealth management. National Bank is the leading bank in Quebec and the partner of choice for SMEs. It is also one of the six systemically important banks in Canada and has branches in almost every province. Clients in the United States, Europe and other parts of the world are served through a network of representative offices, subsidiaries and partnerships. National Bank employs more than 25 487 people with its head office located in Montreal and its securities listed on the Toronto Stock Exchange. As at October 31, 2019, the Bank had total assets in excess of CDN $281 billion.

C0.2

(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	November 1 2018	October 31 2019	No	<Not Applicable>

C0.3

(C0.3) Select the countries/areas for which you will be supplying data.

Canada
France
Ireland
Malta
United Kingdom of Great Britain and Northern Ireland
United States of America

C0.4

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

CAD

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 organizational activities does your organization undertake?

Bank lending (Bank)
Investing (Asset manager)

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	Environmental, Social and Governance (ESG) oversight is a documented responsability of the Governance and Conduct Review Board Committee (CRG). The VP corporate responsibility reports to the CRG on a semi-annual basis or more frequently as required including with respect to climate-related issues.

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 implementation and performance of objectives	Climate-related risks and opportunities to our own operations Climate-related risks and opportunities to our bank lending activities Climate-related risks and opportunities to our investment activities Climate-related risks and opportunities to our other products and services we provide to our clients The impact of our own operations on the climate	Environmental, Social and Governance (ESG) oversight is a documented responsability of the Board of Directors, in addition to being an integral part of of the board's committees' charters. ESG topics related to the committee's core functions are discussed at relevant times and escalated to the Board when necessary. For example, the Conduct Review and Corporate Governance Committee (CRCGC) oversees ESG trends and reviews the Bank's practices to stay abreast with leading practices. The CRCGC may approve certain amendments, unless under the purview of the Board.
Please select	Please select	Climate-related risks and opportunities to our own operations Climate-related risks and opportunities to our bank lending activities The impact of our own operations on the climate	

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
Chief Financial Officer (CFO)	CEO reporting line	Managing climate-related risks and opportunities	Risks and opportunities related to our bank lending activities Risks and opportunities related to our investing activities Risks and opportunities related to our other products and services Risks and opportunities related to our own operations	Half-yearly
Chief Risks Officer (CRO)	CEO reporting line	Both assessing and managing climate-related risks and opportunities	Risks and opportunities related to our bank lending activities Risks and opportunities related to our investing activities Risks and opportunities related to our other products and services Risks and opportunities related to our own operations	Half-yearly

C1.2a

(C1.2a) Describe where in the organizational structure this/these position(s) and/or committees lie, what their associated responsibilities are, and how climate-related issues are monitored (do not include the names of individuals).

National Bank has put in place an executive level corporate Environmental, Social and Governance (ESG) committee. This committee is chaired by the Chief Financial Officer of the Bank and is responsible for developing the corporate strategy regarding ESG matters at the Bank. Executives representing key sectors within the Bank are part of the committee (Risk, Legal, Public Affairs, Compliance, etc.). The committee will follow closely the implementation of the TCFD principles within the Bank, the integration of a new risk model taking into account climate-related issues and the development of a green product offering. The committee reports on a semi-annual basis or more frequently as required to the Board on ESG files.

Falling under the ESG committee, the Bank has also put in place a corporate environmental committee. Managers from key Bank sectors are represented. The committee focuses on the implementation of the Bank's green product offering and ensures relevant information on arising environmental issues are shared within the Bank.

The Bank has also put in place an employee committee dedicated to the environment (Positive Impact Environment). This committee focuses on initiatives that aims to make the Bank a more ecoresponsible work environment.

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	The Bank's commitment to the community and incorporation of ESG criteria is a criterion for executive compensation. Although this isn't a quantitative metric, it does have an incidence on executive compensation.

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 inventivized	Comment
Chief Executive Officer (CEO)	Non-monetary reward	Other (please specify)	Please refer to the ESG-related compensation found in the management proxy circular at page 85

C-FS1.4

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

	We offer an employment-based retirement scheme that incorporates ESG principles, including climate change.	Comment
Row 1	No, but we plan to do so in the next two years	We are currently considering a number of options to integrated ESG metrics/principles into compensation

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	1	
Medium-term	1	5	
Long-term	5		

C2.1b

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

The Bank recognizes the importance of identifying, assessing, and managing climate-related risks. To this end, it proactively monitors all risks as well as its segments' risk exposures in relation to its risk appetite and established limits. Top and emerging risks are risks that could have a material adverse effect on the Bank's financial results, reputation, or long-term business model and strategy. These risks include credit, market, liquidity, operational, and ESG risks as well as climate-related risks. In addition, rapidly changing economic, regulatory, technological and business environments may have an impact on certain activities or on the Bank as a whole.

Based on the TCFD's recommendations, the Bank has identified two types of relevant climate-related risks to include in its monitoring activities: physical risks and transition-related risks. It defines physical risks as the potential impacts on its physical assets and financial assets arising from more frequent and more intense extreme weather events, food insecurity, and energy and resource supply problems related to climate change. The Bank defines transition-related risks as the impacts arising from the move toward a low-emission economy. Such impacts include technological changes or public policy directions that could lead to a revaluation of the company's assets and result in new costs or new opportunities. The Bank's definition of transition-related risk also includes market risk and reputational risk.

The Bank ensures that it has processes in place to proactively identify and measure these risks so that it can implement appropriate mitigation strategies. To this end, the Bank has implemented an environmental policy that applies to activities and decisions across the Bank as well as in all its business segments. This policy clearly sets out the established principles for identifying and limiting environmental risk as well as the impacts on the community and its business segments.

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

Description of process
The Bank recognizes the importance of identifying, assessing, and managing climate-related risks. To this end, it proactively monitors all risks as well as its segments' risk exposures in relation to its risk appetite and established limits. The Board identifies environmental, social, and governance (ESG) issues, including the impacts that climate change could have on the organization as a whole, and monitors the evolution of those issues. The Risk Management Committee, Audit Committee, and Conduct Review and Corporate Governance Committee are responsible for periodically examining the efforts made by the Bank to ensure that it is operating in accordance with high standards of corporate responsibility, including in environmental issues. This year, their respective mandates were expanded in this regard. Each year, the Board also reviews the Bank's Social Responsibility Report, which notably provides details about its contribution to environmental protection. To further clarify the Bank's commitment to exercising effective governance with regard to mechanisms to oversee risks and opportunities related specifically to the climate, the Risk Management Committee has a specific responsibility to ensure that the risk management framework takes ESG risks into account such that they are appropriately identified and monitored and integrated into the existing risk management processes. Over the past year, the Bank has completed a classification of the physical risks and transition-related risks based on each of the industries that make up its credit portfolios. In addition, in response to the TCFD's recommendations, the Bank assessed the proportion of its carbon-related exposures to better understand the impacts of climate-related risks and opportunities on its credit portfolios. The results of these assessments will allow the Bank to start by examining its investment and asset growth strategy in more detail. They will also help guide the Bank's climate scenario analyses of these industries in the years to come. The Bank continues to work with its peers to find solutions for more accurate and consistent analyses and assessments of climate-related risks and opportunities. It is also a member of several strategic working groups, helping it to stay abreast of developments related to ESG risks, particularly climate risks. In 2019, our Board of Directors approved a series of sustainable development principles that inspire our approach and our actions. Supporting sustainable development is an intrinsic part of our One Mission. Environmental, social and governance considerations play a key role in our business and operational decisions. On the environmental side, we want to work to develop a green economy following those principles: 1. We consider the fight against climate change in our economic and community actions 2. We guide and advise our clients in their energy transition 3. We manage and reduce our environmental footprint in all of our business segments The Bank ensures that it has processes in place to proactively identify and measure these risks so that it can implement appropriate mitigation strategies. To this end, the Bank has implemented an environmental policy that applies to activities and decisions across the Bank as well as in all its business segments. This policy clearly sets out the established principles for identifying and limiting environmental risk as well as the impacts on the community and its business segments. Given that environmental risk is associated with credit risk and operational risk, the Bank recognizes the importance of incorporating several additional control measures into its existing risk management processes. To this end, risks are regularly reported to the Enterprise-Wide Risk Management Committee. The Bank's current approach to controlling risks includes regularly identifying and prioritizing the impacts of physical risks and transitional risks. This applies to all industries affected by the Bank's assets. In the interests of proactively ensuring the strategic positioning of its entire portfolio, the Bank has expressed its desire to support the energy transition toward a lower-carbon economy. Through its credit adjudication process, it seeks to develop and implement a process for assessing and quantifying the impacts of climate change on its strategy and results. Note: Over the past year, we have assessed the financial risks associated with climate change qualitatively. Quantitative impacts will be qualified in subsequent phases. We'll be publishing more information on our strategy to fight climate change over the coming year.

Value chain stage(s) covered
Direct operations
Downstream

Risk management process
Integrated into multi-disciplinary company-wide risk management process

Frequency of assessment
Annually

Time horizon(s) covered
Short-term
Medium-term

Description of process
Based on the TCFD's recommendations, the Bank has identified two types of relevant climate-related risks to include in its monitoring activities: physical risks and transition-related risks. The Bank's current approach to controlling risks includes regularly identifying and prioritizing the impacts of physical risks and transitional risks. This applies to all industries affected by the Bank's assets. In the interests of proactively ensuring the strategic positioning of its entire portfolio, the Bank has expressed its desire to support the energy transition toward a lower-carbon economy. Through its credit adjudication process, it seeks to develop and implement a process for assessing and quantifying the impacts of climate change on its strategy and results. Moreover, all industries have been classified according to potential financial impacts from physical risks (extreme weather events and changing climate) and transition risks (revenue and cost impacts from changes in policy, technology, reputation, legal, and market changes) as well as carbon related impacts. We are currently in a process to review those risks on a deeper manner and on an individual client basis. Starting with corporate customers and then commercial customers. Note: Over the past year, we have assessed the financial risks associated with climate change qualitatively. Quantitative impacts will be qualified in subsequent phases. We'll be publishing more information on our strategy to fight climate change over the coming year.

C2.2a

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

	Relevance & inclusion	Please explain
Current regulation	Relevant, always included	The federal carbon tax and Québec's cap and trade requirements do not affect the Bank's operations directly, however our supply chain and clients which carbon emissions are high could be affected by climate regulations. This could transpose on the Bank's cost structure and credit risks (loans losses), as well as on the Bank's reputation. The Bank takes reasonable measures to comply with the laws and regulations in effect in the jurisdictions (cities) where it operates. Our standards are aligned with LEED criteria, which are automatically applied to Bank's buildings. Therefore, we are complying with the climatic regulations currently in place. Also, the Bank is committed to reduce its environmental footprint to avoid any litigation exposure by implementing, on a voluntary basis, various eco-responsible measures aimed at calculating and reducing its GHG emissions. This includes significant improvements made to the energy efficiency of its facilities over the past 15 years. The Bank has implemented an innovative system for managing the energy consumption of 300 branches that uses a web-based interface. As a result, the Bank can monitor its facilities in real time with a view to managing its energy consumption more effectively. the Bank has renewed its commitment to achieving carbon neutrality by reducing its carbon footprint and compensating for its greenhouse gas emissions by buying carbon credits. In 2019, the Bank purchased 10,881 carbon credits to offset 2019 emissions on the basis of its 2018 footprint.
Emerging regulation	Relevant, always included	The Bank is currently participating in discussion with different government institutions, as well as with different banking industry regulators. In order to be up-to-date with any future climate policies that will be established by the regulators. It helps the Bank to plan any reasonable measures to comply with the laws and regulations that will be in effect in the jurisdictions where it operates in order to avoid any exposure to litigation due to future policy changes. Also, we are partners at the Canada Green Building Council. The Council is on the lookout for new regulations and also works to influence them. So our participation gives us a glimpse of future regulations in relation to, among other things, carbon-neutrality objectives for buildings, carbon intensity thresholds for buildings, etc. We are also preparing to emerging regulations, by working on the TCFD roadmap and Principles for Responsible Banking
Technology	Relevant, always included	Primarily a services provider, the Bank is less impacted by the technology risk in relation to climate change than other industries. Despite this, the Bank has set up a series of eco-responsible measures that allow for better management of greenhouse gas emissions arising from its activities and for a cleaner environment. The Bank continues to identify and measure climate-related risks. It leads by example by focusing on energy efficiency, example recycling of technology equipment, reducing the intensity of its GHG emissions, and incorporating sustainable building principles into the design and operation of its establishments.
Legal	Relevant, always included	The Bank would also be forced to deal with operational risk and the risk related to the legal environment when environmental issues arise in its branches or administrative offices. In this context, the Risk Management Group develops requirements that are prescribed in its internal policies in order to reveal, assess, control and monitor environmental risk. For their part, the business segments and corporate units must integrate requirements and controls related to the management of environmental risk in their activities. The Risk Management Group monitors its application and regularly reviews the standards. The Bank takes reasonable measures to comply with the laws and regulations in effect in the jurisdictions where it operates. Should these measures prove ineffective, the Bank could be subject to judicial or regulatory decisions resulting in fines, damages, or other costs or to restrictions likely to adversely affect its net income and damage its reputation. The Bank may also be subject to litigation in the normal course of business. Although the Bank establishes provisions for the measures it is subject to under accounting requirements, actual losses resulting from such litigation could differ significantly from the recognized amounts, and unfavourable outcomes in such cases could have a significant adverse effect on the Bank's financial results. The resulting reputational damage could also affect the Bank's future business prospects. With regards to the loan portfolio, it is through its credit adjudication process that the Bank seeks to develop and implement a process for assessing and quantifying the impacts of climate change on its strategy and results. For non-retail clients within specific industries for which this risk applies, it is discussed at least annually through the credit application/renewal process.
Market	Relevant, sometimes included	The Bank is committed to working toward developing a greener economy. To achieve that, we will work to advance our ideas following these 3 main principles: 1. Consider the fight against climate change in our economic and community actions 2. Guide and advise our clients in their energy transition 3. Manage and reduce our environmental footprint in all of our business segments We acknowledge that there could be a shift in consumer preference as well as access to new market following this trend. The Bank plans on offering more solutions whereby clients can increase their presence in low-carbon activities such as renewable energies and responsible investment. The Bank also provides financial support to environmental organizations whose mission is to promote sustainable development and protect biodiversity and natural environments. For example, here are progresses made during last year. • The 4 Sustainability Bonds issued in 2019 financed projects that advance United Nations Sustainable Development Goals (UN SDGs): https://www.nbc.ca/content/dam/bnc/a-propos-de-nous/relations-investisseurs/fonds-propres-et-dette/2020/na-sustainability-bond-report-2019.pdf. • Our subsidiary National Bank Investments has a 100% open architecture structure, which aims to provide superior risk-adjusted returns over the long term, for all investor profiles, by selecting the best portfolio managers around the world. NBI encourages them to follow its Environment, Social and Governance factors integration (ESG) policy. NBI views ESG factors integration as an essential component of sound portfolio management practices: https://www.nbinvestments.ca/content/dam/bni/en/public/info-pager/nbi-esg-factors-integration-policy.pdf • Bank National Investments has also launched three actively managed sustainable ETFs in march 2020. https://www.nbinvestments.ca/about-us/press-releases/national-bank-investments-launches-three-actively-managed-sustainable-etfs.html • On the retail business side, carbon credit options and eco-responsible products purchases are now available via the mastercard points program and we will soon launch various green products.
Reputation	Relevant, always included	The Bank believes that it has a role to play in the fight against climate change. It supports the global community's efforts to move towards an economy that is more respectful of the environment and towards a sustainable economic development model that is low in GHG emissions. Having given its support to the Financial Stability Board's Task Force on Climate-related Financial Disclosures (TCFD), the Bank has committed to ensuring that its disclosures include relevant information on the various topics addressed by this group. In addition, in collaboration with industry partners, the Bank is working to develop a coherent and useful framework for disclosing climate-change-related financial data. The Bank continues to identify and measure climate-related risks. It leads by example by focusing on energy efficiency, reducing the intensity of its GHG emissions, and incorporating sustainable building principles into the design and operation of its establishments. The Bank also monitors the leading thinking, coming from provincial and national authorities, on climate issues. The Bank has a policy, approved by the Board, that covers reputation risk stemming from complex structured financing transactions and other transactions that may give rise to reputation issues. The policy sets the reputation risk management rules and practices applicable to these transactions. The policy is complemented by the special provisions of the new products and activities policy, which determines the approvals required by the various committees that assess risk whenever new products or activities are introduced within the business units. These provisions are intended, among other things, to provide oversight for the management of reputation risk, which may be material for such products or activities. The new products and activities policy require that any new product or activity for which reputation risk is determined to be high be submitted to the GRC for approval. The activities of the Compliance Service, Legal Affairs Department, Public Relations Department and Investor Relations Department complete the reputation risk management framework.
Acute physical	Relevant, always included	The Bank continues to identify and measure climate-related risks. It has business continuity plans in place that are tested periodically to ensure their effectiveness in times of crisis. The Bank's Risk Management Group also develops requirements that are prescribed in its internal policies in order to reveal, assess, control and monitor environmental risk. For their part, the business segments and corporate units must integrate requirements and controls related to the management of environmental risk in their activities. The Risk Management Group monitors its application and regularly reviews the standards. To mitigate this risk, the Bank has an outsourcing risk management framework that includes business continuity plans that are tested periodically to ensure their effectiveness in times of crisis. Within our stress testing framework (which is part of a Bank-wide stress testing program), physical risks scenarios will be analyzed. It is an important and useful tool for assessing the potential impacts arising from major operational events. It helps the Bank define its risk appetite, set its exposure limits, and engage in strategic planning. More specifically, it helps senior management to better understand the risks facing the Bank and to make appropriate management decisions to mitigate potential operational risks. Moreover, the Bank continues to work with its peers to find solutions for more accurate and consistent analyses and assessments of climate-related risks and opportunities.
Chronic physical	Not evaluated	

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	Please explain
Bank lending (Bank)	Yes	Given that environmental risk is associated with credit risk and operational risk, the Bank recognizes the importance of incorporating several additional control measures into its existing risk management processes. To this end, risks are regularly reported to the Enterprise-Wide Risk Management Committee. The Bank's current approach to controlling risks includes regularly identifying and prioritizing the impacts of physical risks and transitional risks. This applies to all industries affected by the Bank's assets. In the interests of proactively ensuring the strategic positioning of its entire portfolio, the Bank has expressed its desire to support the energy transition toward a lower-carbon economy. Through its credit adjudication process, it seeks to develop and implement a process for assessing and quantifying the impacts of climate change on its strategy and results.
Investing (Asset manager)	No, but we plan to do so in the next two years	Climate related risk and opportunities are assessed by the external portfolio managers of our Sustainable ETFs (minority of assets). NBI has access to reporting from its external portfolio managers on the matter. Plus, NBI is currently doing a proof of concept with a service provider regarding climate related data and analytics that could cover most of our assets.
Investing (Asset owner)	<Not Applicable>	<Not Applicable>
Insurance underwriting (Insurance company)	<Not Applicable>	<Not Applicable>
Other products and services, please specify	Not applicable	

C-FS2.2c

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

	Portfolio coverage	Assessment type	Description
Bank lending (Bank)	Minority of the portfolio	Qualitative and quantitative	With regards to the loan portfolio, we began by assessing our credit exposures through climate-related risk and opportunities on an industry level. To this end, we have developped an industry matrix and based on a scorecard, we've had a view of the most impacted industries and of our entire non-retail lending portfolio with regards to the climate-related risks. Furthermore, following the TCFD guidance for banks, we've also classified the non-retail lending portfolio as a percentage of carbon-related industries and renewable energies. For the next phase, we plan to include a stronger climate change due diligence analysis with all our corporate and commercial accounts. (i.e. review the climate-related risk on an individual client basis - starting with corporate customers and then commercial customers). It is through its credit adjudication process that the Bank seeks to develop and implement a process for assessing and quantifying the impacts of climate change on its strategy and results. For non-retail clients within specific industries for which this risk applies, it is discussed at least annually through the credit application/renewal process. In addition, in collaboration with industry partners, the Bank is working to develop a coherent and useful framework for disclosing climate-change-related financial data.
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>
Other products and services, please specify	<Not Applicable>	<Not Applicable>	<Not Applicable>

C-FS2.2d

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

	We assess the portfolio's exposure	Portfolio coverage	Please explain
Bank lending (Bank)	No, we don't assess this	<Not Applicable>	In Canada, water-related risks and opportunities are not presently considered as an issue for our stakeholders or regulators.
Investing (Asset manager)	No, we don't assess this	<Not Applicable>	No, we currently do not have the data to do so.
Investing (Asset owner)	<Not Applicable>	<Not Applicable>	<Not Applicable>
Insurance underwriting (Insurance company)	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other products and services, please specify	Please select	<Not Applicable>	

C-FS2.2e

(C-FS2.2e) Do you assess your portfolio’s exposure to forests-related risks and opportunities?

	We assess the portfolio's exposure	Portfolio coverage	Please explain
Bank lending (Bank)	No, we don't assess this	<Not Applicable>	In Canada, forests-related risks and opportunities are not presently considered as an issue for our stakeholders or regulators.
Investing (Asset manager)	No, we don't assess this	<Not Applicable>	No, we currently do not have the data to do so.
Investing (Asset owner)	<Not Applicable>	<Not Applicable>	<Not Applicable>
Insurance underwriting (Insurance company)	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other products and services, please specify	No, we don't assess this	<Not Applicable>	

C-FS2.2f

(C-FS2.2f) Do you request climate-related information from your clients/investees as part of your due diligence and/or risk assessment practices?

	We request climate-related information	Please explain
Bank lending (Bank)	Yes, for some	As part as the adjudication/ annual review processes, we have begin to request information from our client within specific industries (i.e. O&G and utilities).
Investing (Asset manager)	Yes, for some	ESG preferences are discussed with some institutional or high net worth clients (NBT and PW1859). This is not part of our procedures for the mass affluent products (NBC retail branches).
Investing (Asset owner)	<Not Applicable>	<Not Applicable>
Insurance underwriting (Insurance company)	<Not Applicable>	<Not Applicable>
Other products and services, please specify	Please select	

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

Current regulation	Carbon pricing mechanisms

Primary potential financial impact

Increased direct costs

Climate risk type mapped to traditional financial services industry risk classification

Policy and legal risk

Company-specific description

Carbon pricing, in the form of carbon taxes and emissions trading systems, is an instrument that is increasingly integrated in regional and national policies under which the Bank operates. Canada, the United States, Cambodia, the United Kingdom, Ireland and France are the current jurisdictions where the Bank has activities and where such a system is implemented. For example, in Canada – where most of the Bank’s activity takes place – there is a carbon pricing scheme that is likely to affect the Bank’s operational costs and value of investments (especially the ones related to the energy and transportation sectors). Higher carbon taxes could thus increase the Bank’s expenses associated with natural gas, fuel oil, steam and electricity consumption in buildings as well as business travel (transportation).

Time horizon

Medium-term

Likelihood

Likely

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
The impact has not been quantified financially

Cost of response to risk

Description of response and explanation of cost calculation

Comment
The Bank is committed to reducing its environmental impact by voluntarily adopting various measures to calculate and reduce its greenhouse gas (GHG) emissions. It has significantly improved energy efficiency in its buildings over the past 20 years. As a member of Hydro-Québec's Energy Savers' Circle, the Bank has put in place an innovative web-controlled remote interface for managing energy use in more than 100 of its branches. With this system, it can monitor its facilities to ensure it meets its energy efficiency targets year after year.

Identifier
Risk 2

Where in the value chain does the risk driver occur?
Direct operations

Risk type & Primary climate-related risk driver

Reputation	Increased stakeholder concern or negative stakeholder feedback

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
The Bank recognizes that how we do or do not address climate change can impact our reputation, and subsequently our business. As our stakeholders' awareness of and sensitivity to the risks of climate change continue to grow, it becomes increasingly important for us to respond in a thoughtful and deliberate manner. The Bank has to understand and address the potential impacts of climate change to our clients and our business, be more transparent in our ESG practices and examine our third parties' sustainable business practices. We aim to follow the most rigorous social responsibility standards while having a positive impact on all our stakeholders as they have evolving interests and concerns pertaining to climate change and other environmental issues. We must be more proactive and strategic in our communications and actions. The Bank is aware that it has to take action to tackle climate change through concrete measures that could impact our clients and subsequently the health of our business. To this end, we will adopt a framework to assess, mitigate and manage climate -related risks at both the portfolio and individual transaction levels.

Time horizon
Long-term

Likelihood
Unlikely

Magnitude of impact
Medium-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
The impact has not been quantified financially

Cost of response to risk

Description of response and explanation of cost calculation

Comment

Identifier
Risk 3

Where in the value chain does the risk driver occur?
Direct operations

Risk type & Primary climate-related risk driver

Reputation	Stigmatization of sector

Primary potential financial impact
Decreased access to capital

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

Company-specific description
How the Bank is perceived to be managing its climate change-related risks can have a direct impact on its stock price. This reputation risk includes bad ratings from extra-financial agencies and possible bad communication in the media. As a financial services provider, NBC's climate risks may be less risky than those of our customers, but we are more frequently being evaluated based on our customers' impact due to our financial relationship with them. A negative evaluation could damage the Bank's reputation and result in a loss of business. For this reason we make sure to take the time to get to know our customers. An environmental scandal involving National Bank of Canada could have a negative impact on its stock price.

Time horizon
Medium-term

Likelihood
Likely

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
The impact has not been quantified financially

Cost of response to risk

Description of response and explanation of cost calculation

Comment

Identifier
Risk 4

Where in the value chain does the risk driver occur?
Direct operations

Risk type & Primary climate-related risk driver

Acute physical	Increased severity and frequency of extreme weather events such as cyclones and floods

Primary potential financial impact
Increased credit risk

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

Company-specific description
Concerning floods and droughts, an example of sensitive activities is the agricultural sector. The Bank's agricultural sector portfolio represents 4% of the total loan book. Increased severity and frequency of extreme weather may expose the Bank to credit losses such as: a) unexpectedly make the obligor unable to honour its obligations towards the Bank; b) decrease the value of the Bank’s security such as to result in a loss in the event of default, or increase such loss in the event of default beyond initial projections. Over the past few years, we have conducted analysis of disaster scenarios such as earthquakes. We hope to be able to reuse the global framework to incorporate scenarios of extreme temperature change in a near future.

Time horizon
Long-term

Likelihood
About as likely as not

Magnitude of impact
Medium-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
The impact has not been quantified financially

Cost of response to risk

Description of response and explanation of cost calculation

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?
Downstream

Opportunity type
Products and services

Primary climate-related opportunity driver
Shift in consumer preferences

Primary potential financial impact
Increased revenues resulting from increased demand for products and services

Company-specific description
Some clients require investment products that go beyond the integration of ESG factors the investment process. In this context, National Bank Investments (NBI) has launched 3 ETFs aligned with the United Nations' Sustainable Development Goals (SDG). The portfolio managers of these ETFs invest in companies that contribute to the achievement of SDGs, which includes goal 13 – Climate action. These products are available to all Canadian investors on the National Bank Direct Brokerage platform, through an investment advisor or some of your high net worth and institutional channels.

Time horizon
Medium-term

Likelihood
Very likely

Magnitude of impact
Medium-low

Are you able to provide a potential financial impact figure?
Please select

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
We do not provide these figures publicly.

Cost to realize opportunity

Strategy to realize opportunity and explanation of cost calculation
Our subsidiary National Bank Investments (NBI) promotes on an ongoing basis its 100% open architecture structure (it sub-advises exclusively to other firms the portfolio management of the funds built for its product shelf). It also puts forward its OP4+ governance process, which takes into account the integration of ESG factors - including climate-related factors - in its assessment of external sub-advisors. For more information: https://tinyurl.com/y2jvp7od

Comment

Identifier
Opp2

Where in the value chain does the opportunity occur?
Downstream

Opportunity type
Markets

Primary climate-related opportunity driver

Access to new markets

Primary potential financial impact
Increased revenues through access to new and emerging markets

Company-specific description
In 2019, NBC adopted ESG principles in line with the United Nations Sustainable Development Goals. To accomplish the Bank's goal to contribute in developing a green economy and to respond to the growing demand from the market (institutional investors) for green products, we established a sustainability bond framework and issued four sustainability bonds. These issuances supports NBC's commitment to financing activities that address climate change issues.

Time horizon
Medium-term

Likelihood
Very likely

Magnitude of impact
Medium

Are you able to provide a potential financial impact figure?
Please select

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
We do not provide these figures publicly.

Cost to realize opportunity

Strategy to realize opportunity and explanation of cost calculation
In line with the ICMA Green Bond Principles and Social Bond Principles, NBC issued four Sustainability Bonds which represent 1,2 billions as of December 31, 2019. These bonds are allocated to financing projects and organizations that credibly contribute to the environmental objectives (climate change mitigation and adaptation, natural resource conservation, biodiversity conservation, and pollution prevention and control) or seek to achieve positive socioeconomic outcomes for target populations. For more information please consult our 2019 Sustainability Bond Report : https://www.nbc.ca/content/dam/bnc/a-propos-de-nous/relations-investisseurs/fonds-propres-et-dette/2020/na-sustainability-bond-report-2019.pdf

Comment
We do not provide these figures.

Identifier
Opp3

Where in the value chain does the opportunity occur?
Downstream

Opportunity type
Energy source

Primary climate-related opportunity driver
Use of lower-emission sources of energy

Primary potential financial impact
Increased revenues through access to new and emerging markets

Company-specific description
The Bank aims at guiding and advising clients in their energy transition and having a positive impact on the community by financing projects that support renewable energy. These projects enable us and our clients to lower their carbon footprint and their impact on fossil fuel depletion. This is aligned with the Bank's ESG principles to contribute in developing a green economy. Furthermore, this opportunity enables us to respect our engagements towards TCFD recommendations and the Principles for Responsible Banking.

Time horizon
Medium-term

Likelihood
Very likely

Magnitude of impact
High

Are you able to provide a potential financial impact figure?
Please select

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
The impact has not been quantified financially

Cost to realize opportunity

Strategy to realize opportunity and explanation of cost calculation

National Bank has announced in its last Shareholder Annual meeting that it aims to grow its portfolio of loans to renewable-energy companies at least as fast as its portfolio of traditional energy sources, over the mid and long-term: https://tinyurl.com/y2nmplcg. The Bank is currently achieving this goal.

Comment

C3. Business Strategy

C3.1

(C3.1) Have climate-related risks and opportunities influenced your organization's strategy and/or financial planning?

Yes

C3.1a

(C3.1a) Does your organization use climate-related scenario analysis to inform its strategy?

No, but we anticipate using qualitative and/or quantitative analysis in the next two years

C3.1c

(C3.1c) Why does your organization not use climate-related scenario analysis to inform its strategy?

The Bank, aware that it has a mobilizing role to play in environmental matters, announced its support for the Financial Stability Board's Task Force on Climate Related Financial Disclosures (TCFD) and will disclose, in addition to its performance reports, the information recommended by the task force. The use of climate-related scenarios is currently not integrated in the development of the Bank's business strategy as the framework and resources are not yet in place.

National Bank is continuously improving its TCFD disclosure and will publish a more comprehensive response in the coming months. We aim to implement the TCFD recommendations, including climate-related scenario analysis, into the activities of various Bank sectors over the next few years.

C3.1d

(C3.1d) 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	To help our clients in their energy transition, the Bank plans on offering more solutions whereby clients can increase their presence in low-carbon activities such as renewable energies and responsible investment. For example, the Bank has set up a framework in 2018 that allows for the issuance of sustainability bonds which will enable various organizations, including the Bank itself, to issue debt securities to finance projects that meet certain environmental and social criteria. Also, as a result of increase awareness on climate issues the Bank provides financial support to environmental organizations whose mission is to promote sustainable development and protect biodiversity and natural environments.
Supply chain and/or value chain	Yes	The fact that the Bank facilitates the energy transition of their clients have a positive impact on the community and certainly demonstrate our engagement towards a green economy. As a result, the Bank recognizes the opportunity to adapt the way we engage with our stakeholders.
Investment in R&D	No	The Bank does limited investments in R&D. Climate-related risks and opportunities influence the overall strategy of the Bank. The Bank focus its investments on risks and opportunities that answers markets and client's expectations, which are more related to products and services, operations and supply chain.
Operations	Yes	The Bank took its first step toward managing its carbon footprint in 2007-2008, by quantifying its GHG emissions. Since then, the Bank has been repeating the exercise every year. We work in close collaboration with a number of recognized expert firms to do this. Our goal is to align our methods with current best practices. Since most of our emissions come from electricity and fossil fuel consumption, energy efficiency is a top priority. A measure that shows great promise within the field is an innovative system that lets us manage energy use in more than 100 branches using a web interface. We use remote management to optimize energy consumption in our buildings. With this system, the Bank can save millions of kilowatt hours of electricity and thousands of cubic metres of natural gas annually. Centralized remote management has allowed us to participate in Hydro Québec's Demand Response program, which aims to reduce energy demand during peak winter periods. To keep saving energy over time, we have simultaneously adopted a Continuous Energy Improvement approach. Taking into account changes made throughout the life cycle of our buildings, this innovative approach lets us monitor our facilities to ensure that we meet our energy efficiency targets every year

C3.1e

(C3.1e) 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	Revenues	Our institutional clients and the market requested some sustainable products to help them with their energy transition. The Bank saw an opportunity to help them and gain new clients.

C3.1f

(C3.1f) Provide any additional information on how climate-related risks and opportunities have influenced your strategy and financial planning (optional).

C-FS3.2

(C-FS3.2) Are climate-related issues considered in the policy framework of your organization?

No, but we plan to consider climate-related issues in our policy framework in the next two years

C-FS3.2c

(C-FS3.2c) Why are climate-related issues not considered in the policy framework of your organization?

The Bank is currently implementing the TCFD recommendation. The roadmap for the implementation is on a horizon of two year. The policy framework of BNC will include climate-related issues in about two years.

C-FS3.3

(C-FS3.3) Are climate-related issues factored into your external asset manager selection process?

No, for none of our externally managed assets

C-FS3.3b

(C-FS3.3b) Why are climate-related issues not factored into your external asset manager selection process?

Few external managers currently consider climate risk in their investment process, thus would make it too restrictive criteria. We are currently having discussions on climate risk with some of our managers, but it's not a formal evaluation criteria yet.

C4. Targets and performance

C4.1

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

No target

C4.1c

(C4.1c) Explain why you did not have an emissions target, and forecast how your emissions will change over the next five years.

	Primary reason	Five-year forecast	Please explain
Row 1	We are planning to introduce a target in the next two years	It is expected that Scope 1 and Scope 2 emissions will decrease in the next five years due to further closing and merging of branches and continuous efforts to improve the energy efficiency in buildings. Efforts made in the past regarding the optimization of energy use in buildings have proven to have an impact on the reduction of the Bank's Scope 1 and Scope 2 emissions. Just like most companies, we reviewed our working practices in light of the global pandemic. Key takeaways from this unprecedented situation will be taking into account in the Bank's strategy to further reduce its GHG emissions.	The Bank has worked over the past months on an emission target setting project and will be ready to disclose publicly the target in September 2020. Different targets were under study, including science-based targets following the well-below 2-degree scenario and the 1.5-degree scenario.

C4.2

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

No other climate-related targets

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	13	
To be implemented*	3	
Implementation commenced*	11	
Implemented*	6	0.02
Not to be implemented	0	

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	Other, please specify (Building services include building controls, lighting and HVAC. The estimated annual CO2e savings cover all the work performed on the building controls, lighting and HVAC systems located in the NBC branches.)

Estimated annual CO2e savings (metric tonnes CO2e)

0.02

Scope(s)

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

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

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

Payback period

Please select

Estimated lifetime of the initiative

Please select

Comment

The activities performed aim to maintain energy savings, ensure the comfort of the building occupants and reduce maintenance costs. The majority of NBC branches are connected through a centralized control system that allows NBC to conduct rigorous monitoring of its buildings (i.e. continuous commissioning). NBC works closely with an external firm specialized in energy efficiency in buildings to plan and implement initiatives that will help achieve their goal to reduce the energy consumption of their branches (and at the same time, their GHG emissions) by 20% yearly. The annual monetary savings is based on an average value calculated for all NBC branches that are part of the continuous commissioning process. The investment value includes all expenses related to electromechanical improvements, unit replacement, controllers, lighting and engineering fees.

C4.3c

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

Method	Comment
Dedicated budget for energy efficiency	The Engineering, Operation and Sustainable Development team within NBC has a dedicated budget for projects related to the optimization of control systems for the NBC branches. All activities conducted within these projects are planned and implemented with the help of an external firm specialized in energy efficiency to ensure that they follow energy efficiency standards while maintaining the comfort of building occupants and reducing operational costs. In addition, when branches are going through a major refurbishment or retrofit, an additional budget is always invested in the HVAC system to ensure that it fulfills NBC's requirements in terms of energy efficiency.
Other (External financial incentives)	NBC takes part in an Electricity management systems (EMS) program for businesses ran by its electricity provider in Quebec. This program aims to provide financial assistance for any energy efficiency projects in buildings. NBC has received financial support from this program when the company installed energy-efficient systems or components (e.g. lights, lighting controls, power monitoring system, etc.).

C4.5

(C4.5) Do you classify any of your existing goods and/or services as low-carbon products or do they enable a third party to avoid GHG emissions?

Yes

C4.5a

(C4.5a) Provide details of your products and/or services that you classify as low-carbon products or that enable a third party to avoid GHG emissions.

Level of aggregation

Product

Description of product/Group of products

NBC issued four sustainability bonds in line with the ICMA Green Bond Principles and Social Bond Principles. NBC's Sustainability Bonds will be allocated to financing of projects and organizations that credibly contribute to the environmental objectives (climate change mitigation and adaptation, natural resource conservation, biodiversity conservation, and pollution prevention and control) or seek to achieve positive socioeconomic outcomes for target populations. The proceeds of these bonds were used to finance renewable energy projects (solar and wind), affordable housing and access to basic and essential services.

Are these low-carbon product(s) or do they enable avoided emissions?

Low-carbon product and avoided emissions

Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions

Green Bond Principles (ICMA)

% revenue from low carbon product(s) in the reporting year

% of total portfolio value

Asset classes/ product types

Investing	Other, please specify (Sustainability Bonds)

Comment

Level of aggregation

Product

Description of product/Group of products

National Bank have a renewable-energy department that offers specialized loans to clients in the renewable-energy industry.

Are these low-carbon product(s) or do they enable avoided emissions?

Avoided emissions

Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions

Please select

% revenue from low carbon product(s) in the reporting year

% of total portfolio value

Asset classes/ product types

Bank lending	Corporate Loans

Comment

C5. Emissions methodology

C5.1

(C5.1) Provide your base year and base year emissions (Scopes 1 and 2).

Scope 1

Base year start
November 1 2017

Base year end
October 31 2018

Base year emissions (metric tons CO2e)
2391

Comment

Scope 2 (location-based)

Base year start
November 1 2017

Base year end
October 31 2018

Base year emissions (metric tons CO2e)
3200

Comment

Scope 2 (market-based)

Base year start
November 1 2018

Base year end
October 31 2019

Base year emissions (metric tons CO2e)

Comment
We have no operations where we are able to access electricity supplier emissions factors or residual emissions factors and are unable to report a Scope 2, market-based figure.

C5.2

(C5.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.
The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

C6. Emissions data

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)
2330

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 have no operations where we are able to access electricity supplier emission factors or residual emissions factors and are unable to report a Scope 2, market-based figure

Comment

C6.3

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

Reporting year

Scope 2, location-based

2901

Scope 2, market-based (if applicable)

<Not Applicable>

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?

No

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, calculated

Metric tonnes CO2e

38572

Emissions calculation methodology

The methodology used was based on the Corporate Value Chain (Scope 3) Accounting and Reporting Standard from the GHG Protocol. The emissions covered in this category are associated with purchased paper, IT equipment, furniture, administrative services and telecommunication services. Except for paper, data on purchases were provided in terms of spending ($CAD) for the reported year. An economic input-output life-cycle assessment database (EIOLCA) was used to convert each dollar spent into kg of CO2 equivalent. To calculate the emissions related to paper consumption, the total weight of office paper purchased during the reporting year was multiplied by an emission factor (per kilogram of paper) provided in the LCA study on fine papers (Groupe AGECO, 2015). The GWP values are taken from the IPCC's Fifth Assessment Report.

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

Please explain

Capital goods

Evaluation status

Relevant, not yet calculated

Metric tonnes 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

The National Bank of Canada does not have a formalized process yet to collect information to report on GHG emissions associated with capital goods.

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

Evaluation status
Relevant, calculated

Metric tonnes CO2e
4794

Emissions calculation methodology
The methodology used was based on the Corporate Value Chain (Scope 3) Accounting and Reporting Standard from the GHG Protocol. The total quantities of electricity and fuel consumed in all spaces used for National Bank of Canada's operations were used as activity data for this category. The emission factors per kilowatt-hour for the calculation of emissions related to upstream electricity emissions were taken from the latest National Inventory Reports (Environment and Climate Change Canada, US EPA, etc.). The most recent and complete factors were applied to the calculations. The emission factors for the upstream processes related to the production of the other fuels (per cubic meter of natural gas, kilogram of light fuel oil were taken from the Canadian National Inventory Report (Environment and Climate Change Canada, 2020). The GWP values are taken from the IPCC's Fifth Assessment Report.

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

Please explain

Upstream transportation and distribution

Evaluation status
Relevant, calculated

Metric tonnes CO2e
300

Emissions calculation methodology
The methodology used was based on the Corporate Value Chain (Scope 3) Accounting and Reporting Standard from the GHG Protocol. Total expenses for messengers, couriers and postal services were the activity data used for the upstream transportation and distribution emissions inventory. The emission factors were taken from the EIOLCA database (an economic input-output database providing emissions per dollar spent). These factors were converted from US currency to Canadian currency and also adjusted with the rate of inflation since 2007. The GWP values are taken from the IPCC's Fifth Assessment Report.

Percentage of emissions calculated using data obtained from suppliers or value chain partners
0

Please explain

Waste generated in operations

Evaluation status
Relevant, calculated

Metric tonnes CO2e
38

Emissions calculation methodology
The methodology used was based on the Corporate Value Chain (Scope 3) Accounting and Reporting Standard from the GHG Protocol. The total weight of paper waste generated by the National Bank branch network was used as the activity data for the calculation of waste generated in operations. The paper waste is recycled by a third-party company and thus only the transportation of the paper waste to the end-of-life treatment facilities was considered. The emission factor for transportation (per ton-kilometer) was calculated using the ecoinvent database v.3.4 (2017). The GWP values are taken from the IPCC's Fifth Assessment Report.

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

Please explain

Business travel

Evaluation status
Relevant, calculated

Metric tonnes CO2e
4215

Emissions calculation methodology
The methodology used was based on the Corporate Value Chain (Scope 3) Accounting and Reporting Standard from the GHG Protocol. Total expenses reported by employees for business travel by train, plane, bus, taxi, personal car and rental car were used as activity data. The reimbursement rates per kilometer were used to estimate the total distance traveled. The emission factors for each mode of transportation (per ton-kilometer) was taken from the GHG Protocol Emission Factors for Cross-Sector Tools (2017). The GWP values are taken from the IPCC's Fifth Assessment Report.

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

Please explain

Employee commuting

Evaluation status
Relevant, calculated

Metric tonnes CO2e
15568

Emissions calculation methodology
The methodology used was based on the Corporate Value Chain (Scope 3) Accounting and Reporting Standard from the GHG Protocol. The total number of employees and the average number of working days were the activity data provided by the National Bank of Canada. To estimate the total distance traveled by employees and the percentages of employees using each mode of transportation, national statistics were used (Statistics Canada and US Census Bureau). The emission factors for each mode of transportation (per ton-kilometer) was taken from the GHG Protocol Emission Factors for Cross-Sector Tools (2017). The GWP values are taken from the IPCC's Fifth Assessment Report.

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

Please explain

Upstream leased assets

Evaluation status
Not relevant, explanation provided

Metric tonnes 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
Leased assets are accounted in Scope 1 and Scope 2 as the operational control has been selected to perform the GHG emissions calculations.

Downstream transportation and distribution

Evaluation status
Not relevant, explanation provided

Metric tonnes 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
National Bank of Canada does not sell physical products. Therefore, downstream transportation and distribution is not relevant to the Bank's operations.

Processing of sold products

Evaluation status
Not relevant, explanation provided

Metric tonnes 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
National Bank of Canada does not sell physical products. Therefore, the processing of sold products is not relevant to the Bank's operations.

Use of sold products

Evaluation status
Not relevant, explanation provided

Metric tonnes 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
National Bank of Canada does not sell physical products. Therefore, the use of sold products is not relevant to the Bank's operations.

End of life treatment of sold products

Evaluation status
Not relevant, explanation provided

Metric tonnes 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
National Bank of Canada does not sell physical products. Therefore, the end-of-life treatment of sold products is not relevant to the Bank's operations.

Downstream leased assets

Evaluation status
Not relevant, explanation provided

Metric tonnes 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
The spaces owned by the National Bank of Canada and leased to other entities is accounted for in Scope 1 and Scope 2 emissions as they are often shared with the Bank and are considered negligible.

Franchises

Evaluation status
Not relevant, explanation provided

Metric tonnes 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
National Bank of Canada does not have franchises.

Other (upstream)

Evaluation status
Not evaluated

Metric tonnes 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
Not evaluated

Metric tonnes 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
0.31

Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)
5231

Metric denominator
full time equivalent (FTE) employee

Metric denominator: Unit total
17146

Scope 2 figure used
Location-based

% change from previous year
9

Direction of change
Decreased

Reason for change
As the decrease in absolute emissions occurs at a much higher rate than the rate of increase in the number of full time equivalent (FTE), the difference between FY2018 and FY2019 results in a net decrease of the intensity based on the FTE. The FTE increased by 1 % while the scope 1 and scope 2 emissions decreased by 8%. The decrease in scope 1 and scope 2 emissions are mainly explained by the implementation of multiple measures related to energy efficiency, power demand management, remote management, reduction in the ratio rental floor space/owned floor space and recommissioning. Please note that the FTE figure reported last year has been corrected. Also, scope 1 and scope 2 emissions figures for the previous year have been partially recalculated to be consistent with the changes made in the calculation methodology. No correction was made regarding the previous year's energy consumption data.

Intensity figure
0.7

Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)
5231

Metric denominator
unit total revenue

Metric denominator: Unit total
7432

Scope 2 figure used
Please select

% change from previous year
11

Direction of change
Decreased

Reason for change
As the decrease in absolute emissions occurs at a much higher rate than the rate of increase in total revenue ($ millions), the difference between FY2018 and FY2019 results in a net decrease of the intensity based on the total revenue. The total revenue increased by 4 % while the scope 1 and scope 2 emissions decreased by 8%. The decrease in scope 1 and scope 2 emissions are mainly explained by the implementation of multiple measures related to energy efficiency, power demand management, remote management, reduction in the ratio rental floor space/owned floor space and recommissioning. Please note that scope 1 and scope 2 emissions figures for the previous year have been partially recalculated to be consistent with the changes made in the calculation methodology. No correction was made regarding the previous year's energy consumption data.

C7. Emissions breakdowns

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 CO_2e)	Direction of change	Emissions value (percentage)	Please explain calculation
Change in renewable energy consumption		<Not Applicable>		
Other emissions reduction activities		<Not Applicable>		
Divestment		<Not Applicable>		
Acquisitions		<Not Applicable>		
Mergers		<Not Applicable>		
Change in output	112	Decreased		The reduction in emissions is mainly due to the decrease in natural gas consumption (201,712 m3 of natural gas less in FY2019 compared to FY2019). Scope 1 and Scope 2 emissions for FY2018 was 5,664 tCO_2eq. The 112 tCO_2eq. decrease in emissions divided by 5,664 tCO_2eq. results in a decrease of 2%.
Change in methodology	321	Please select		The emission factors of the different grid mixes have been updated with the most recent and complete data available disclosed in national inventory reports. The overall emission intensity for the electricity grid mixes has decreased since the previous year. Scope 1 and Scope 2 emissions for FY2018 was 5,664 tCO_2eq. The 321 tCO_2eq. decrease in emissions divided by 5,664 tCO_2eq. results in a decrease of 5.7%.
Change in boundary		<Not Applicable>		
Change in physical operating conditions		<Not Applicable>		
Unidentified		<Not Applicable>		
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?

Location-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	Please select
Consumption of purchased or acquired steam	Yes
Consumption of purchased or acquired cooling	Please select
Generation of electricity, heat, steam, or cooling	Please select

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)	LHV (lower heating value)	0	11983	11983
Consumption of purchased or acquired electricity	<Not Applicable>	78536	10754	89290
Consumption of purchased or acquired heat	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of purchased or acquired steam	<Not Applicable>	0	2010	2010
Consumption of purchased or acquired cooling	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of self-generated non-fuel renewable energy	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Total energy consumption	<Not Applicable>	78536	24747	103283

C9. Additional metrics

C9.1

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

C10. Verification

C10.1

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

	Verification/assurance status
Scope 1	No third-party verification or assurance
Scope 2 (location-based or market-based)	No third-party verification or assurance
Scope 3	No third-party verification or assurance

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?

No, we do not verify any other climate-related information reported in our CDP disclosure

C11. Carbon pricing

C11.2

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

Yes

C11.2a

(C11.2a) Provide details of the project-based carbon credits originated or purchased by your organization in the reporting period.

Credit origination or credit purchase
Credit purchase

Project type
Forests

Project identification
The Bank has also purchased carbon credits from the Nature Conservancy of Canada (NCC) as part of the Darkwoods Forest Carbon Project, one of the largest carbon projects in North America. Located in British Columbia, the Darkwoods Conservation Area is a 63,000-hectare property that was acquired by NCC in 2008 to preserve its ecologically important features, including the fact that it is a significant source of fresh water. This purchase of carbon credits is aligned with the Bank's commitment to protect biodiversity and natural habitats.

Verified to which standard
VCS (Verified Carbon Standard)

And the Climate, Community, and Biodiversity Standard (CCB)

Number of credits (metric tonnes CO2e)

Number of credits (metric tonnes CO2e): Risk adjusted volume

Credits cancelled
Please select

Purpose, e.g. compliance
Please select

Credit origination or credit purchase
Credit purchase

Project type
Other, please specify (GHG reduction & CleanTech)

Project identification
Credits bought on the Quebec cap-and-trade system (or "carbon exchange")

Verified to which standard
Please select

Number of credits (metric tonnes CO2e)

Number of credits (metric tonnes CO2e): Risk adjusted volume

Credits cancelled
Please select

Purpose, e.g. compliance
Please select

C11.3

(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

C12.1

(C12.1) Do you engage with your value chain on climate-related issues?
Yes, our customers
Yes, other partners in the value chain

C12.1b

(C12.1b) Give details of your climate-related engagement strategy with your customers.

Type of engagement
Education/information sharing

Details of engagement
Share information about your products and relevant certification schemes (i.e. Energy STAR)

% of customers by number

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

Portfolio coverage (total or outstanding)
Please select

Please explain the rationale for selecting this group of customers and scope of engagement
To respond to the growing market interest in green products, National Bank issued four Sustainability Bonds in 2019 which financed projects that advanced United Nations Development Goals such as wind and solar renewable energy projects. A report is available to all customers at https://www.nbc.ca/content/dam/bnc/a-propos-de-nous/relations-investisseurs/fonds-propres-et-dette/2020/na-sustainability-bond-report-2019.pdf

Impact of engagement, including measures of success
The publication of the Sustainability Bonds Report allowed our clients to be better informed on how the Bank is financing sustainable developments and how the Bank and our clients can have a positive impact on the community through financial activities. The success can be measured by the 1.2G$ value of the bonds issued, as well as by the number of downloading of the online report.

Type of engagement
Education/information sharing

Details of engagement
Run an engagement campaign to education customers about your climate change performance and strategy

% of customers by number

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

Portfolio coverage (total or outstanding)
Please select

Please explain the rationale for selecting this group of customers and scope of engagement
In order to contribute to collective efforts in the fight against climate change, in the 2019 Annual Meeting of Shareholders, National Bank announced that it aims to grow its portfolio of loans to renewable-energy companies at least as fast as its portfolio of traditional energy sources, over the mid and long-term: https://tinyurl.com/y2nmplcg. This goal is currently achieved. The Bank used the meeting to reach a larger audience to put forward some recent advances in social responsibility and the environment.

Impact of engagement, including measures of success
This message disclosed by the Bank's CEO during the Annual Shareholder Meeting, sent a clear message to current and future clients that the Bank is truly engaged in the energy transition. This message was echoed on several occasions in the media, allowing the Bank to reach a large audience of its commitment. Finally, since this engagement has been made, we can now confirm that we currently are growing our renewable energy portfolio, faster than the non-renewable which shows that the Bank is following its engagements.

Type of engagement
Education/information sharing

Details of engagement
Share information about your products and relevant certification schemes (i.e. Energy STAR)

% of customers by number

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

Portfolio coverage (total or outstanding)
Please select

Please explain the rationale for selecting this group of customers and scope of engagement
National Bank's sustainable practices are reflected in the features of its buildings. Our standards are aligned with LEED criteria, which are automatically applied to the Bank projects. The Bank has obtained a number of LEED certifications for its buildings in recent years. The Bank also has an innovative system that lets us manage energy use in more than 100 branches using a web interface. We installed 20 charging stations in 2019 and will install 10 more in 2020. In our future new head office its 80 charging stations that will be installed. This not only helps the Bank to reduce its energy consumption, it also gives the clients a glimpse at our sustainable practices through the features of our branches. Clients can experience it and have information when visiting our buildings as well as on our web site. https://www.nbc.ca/about-us/national-bank/new-head-office.html

Impact of engagement, including measures of success
This information on facilities helps customers to learn more about initiatives that service companies can take to help develop a green economy. Furthermore, this initiative can have an impact on clients and supplier as to respond to this certifications, we prone partners who also responds to environmental certifications.

C12.1d

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

National Bank partnered with Équiterre and signed an agreement with Coop Carbone and the Nature Conservancy of Canada to offset its GHG emissions. For more information, see the following press release: https://www.nbc.ca/en/about-us/news/news-room/press-releases/2020/20200422-La-Banque-Nationale-devient-partenaire-dEquiterre-et-conclut-une-entente-avec-Coop-Carbone-et-Conservation-de-la-nature-Canada-pour-la-compensation-de-ses-GES.html

C12.3

(C12.3) Do you engage in activities that could either directly or indirectly influence public policy on climate-related issues through any of the following?

Direct engagement with policy makers

C12.3a

(C12.3a) On what issues have you been engaging directly with policy makers?

Focus of legislation	Corporate position	Details of engagement	Proposed legislative solution
Other, please specify (Sustainable best practices)	Support	Supporting and endorsing the City of Montreal's Sustainable Montréal 2016-2020 plan	National Bank endorses this project
Climate finance	Support	National Bank is a member of a climate financing advisory committee formed by the Québec government to develop its new electrification and climate change Plan due in 2020.	National Bank entirely endorses this project

C12.3f

(C12.3f) What processes do you have in place to ensure that all of your direct and indirect activities that influence policy are consistent with your overall climate change strategy?

The Bank is determined to understand and as much as possible reduce the impact of its activities on the environment, and has therefore implemented various measures over a number of years to calculate and reduce its greenhouse gas emissions, such as the most promising and innovative energy-saving measures where web-controlled remote interface for managing energy usage (heating, cooling and ventilation) to optimize energy consumption in its buildings. The system saves the Bank millions of kilowatt hours of electricity and thousands of cubic metres of natural gas annually. This centralized remote control infrastructure has enabled us to take part in Hydro-Québec's Demand Response program for reducing power demand during winter peak times. In order to ensure sustained energy savings, a continuous commissioning process was also implemented concurrently.

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 sustainability report

Status
Complete

Attach the document
report-environmental-social-governance-advances-2019.pdf

Page/Section reference
See pages 12 to 18

Content elements
Emissions figures

Comment
Our GHG emissions for FY2019 will be disclosed in September 2020. Our 2020 GHG reduction target will also be disclosed in September 2020.

Publication
In voluntary sustainability report

Status
Complete

Attach the document
report-environmental-social-governance-advances-2019.pdf

Page/Section reference

Content elements
Governance
Strategy
Risks & opportunities
Emissions figures
Other metrics
Other, please specify (Also contains Social and Governance topics, in additional to SASB alignment of disclsoure.)

Comment

Publication
In mainstream reports

Status
Complete

Attach the document
na-2019-annual-report.pdf

Page/Section reference
Risk Management (page 58 and onwards)

Content elements
Governance
Strategy
Risks & opportunities

Comment

Publication
In mainstream reports

Status
Complete

Attach the document
nbc-circular-2020.pdf

Page/Section reference
Pages 51; 64 and 72 and onwards. They speak to ESG consideration in compensation and various initiatives put in place by the Bank

Content elements
Please select

Comment

C-FS12.5

(C-FS12.5) Are you a signatory of any climate-related collaborative industry frameworks, initiatives and/or commitments?

	Industry collaboration	Comment
Reporting framework	Principles for Responsible Investment (PRI) Task Force on Climate-related Financial Disclosures (TCFD) UNEP FI Principles for Responsible Banking Other, please specify (SASB & Parcours Développement Durable Montréal)	
Industry initiative	Principles for Responsible Investment (PRI) UNEP FI Principles for Responsible Banking	
Commitment	Please select	

C14. Portfolio Impact

C-FS14.1

(C-FS14.1) Do you conduct analysis to understand how your portfolio impacts the climate? (Scope 3 portfolio impact)

	We conduct analysis on our portfolio's impact on the climate	Disclosure metric	Comment
Bank lending (Bank)	No, but we plan to do so in the next two years	<Not Applicable>	
Investing (Asset manager)	No, but we plan to do so in the next two years	<Not Applicable>	
Investing (Asset owner)	<Not Applicable>	<Not Applicable>	<Not Applicable>
Insurance underwriting (Insurance company)	<Not Applicable>	<Not Applicable>	<Not Applicable>
Other products and services, please specify	Please select	<Not Applicable>	

C-FS14.1c

(C-FS14.1c) Why do you not conduct analysis to understand how your portfolio impacts the climate? (Scope 3 Category 15 “Investments” emissions or alternative carbon footprinting and/or exposure metrics)

We plan on doing such analysis in the near-medium term. However, this requires a significant about of planning, resources, on-boarding and time.

C-FS14.3

(C-FS14.3) Are you taking actions to align your portfolio to a well below 2-degree world?

	We are taking actions to align our portfolio to a well below 2-degree world	Please explain
Bank lending (Bank)	No	We are currently working to meet our engagement regarding TCFD and PRB.
Investing (Asset manager)	No	We are currently working to meet our engagement regarding PRI.
Investing (Asset owner)	<Not Applicable>	<Not Applicable>
Insurance underwriting (Insurance company)	<Not Applicable>	<Not Applicable>
Other products and services, please specify	Please select	

C15. 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.

C15.1

(C15.1) Provide details for the person that has signed off (approved) your CDP climate change response.

	Job title	Corresponding job category
Row 1	Chef ESG Operation's Officier	Environment/Sustainability manager

SC. Supply chain module

SC0.0

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

BNC will be developing, in the next 2 years, a program to respond to ESG requirements. Among other intiatives, we will be implementing a Responsable Sourcing program to guide the Bank into making more sustainable choices for our supply chain.

SC0.1

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

	Annual Revenue
Row 1	7432000000

SC0.2

(SC0.2) Do you have an ISIN for your company that you would be willing to share with CDP?
Yes

SC0.2a

(SC0.2a) Please use the table below to share your ISIN.

	ISIN country code (2 letters)	ISIN numeric identifier and single check digit (10 numbers overall)
Row 1	CA	6330671034

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

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.

The Bank is not currently working on this matter, and we first need to establish our responsible sourcing program and collect more data to eventually be able to allocate emissions to our customers.

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

SC3.1

(SC3.1) Do you want to enroll in the 2020-2021 CDP Action Exchange initiative?

No

SC3.2

(SC3.2) Is your company a participating supplier in CDP's 2019-2020 Action Exchange initiative?

No

SC4.1

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

No, I am not providing data

Submit your response

In which language are you submitting your response?

English

Please confirm how your response should be handled by CDP

	I am submitting to	Public or Non-Public Submission	Are you ready to submit the additional Supply Chain Questions?
I am submitting my response	Investors Customers	Public	Yes, submit Supply Chain Questions now

Please confirm below

I have read and accept the applicable Terms