



2022 Truist Climate Lobbying Summary



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Introduction

Truist is a purpose driven financial services company. We inspire and build better lives and communities. Central to this commitment is a responsibility to address and mitigate the risks posed by climate change. It is also important to share with our stakeholders the steps we are taking to advance this commitment, the progress we have made, and the milestones to come.

Transparency is key not only within our own organization, but also in our relationships with trade associations. Periodic reporting is an important tool for sharing the progress we have made and our vision for what lies ahead. This report provides an overview of Truist's climate goals and principles, and also examines actions and positions of the business and financial services-related national trade associations of which we are a member.

Truist is one of many members of these wide-reaching civic, trade, and advocacy organizations. We recognize our goals for climate change and other matters may not always completely align with those of our trade association partners; however, we strive to ensure broad alignment with our most important objectives. For that reason, and to provide stakeholders a progress update, we have reviewed our trade associations to assess whether their positions on climate change support our most important climate objectives.

To assess these organizations and alignment, we evaluate public comments on climate-related legislation and regulations, lobbying and PAC activity, their answers to a Truist climate survey, and our direct engagement with them on climate-related issues. Truist is committed to engaging with its trade association partners; reviewing memberships for alignment on climate-related policy issues; and transparency with stakeholders when reporting our findings.

Truist understands our actions impact stakeholders and communities. Amid an increasingly dynamic political and social environment, we are committed to a positive impact on climate issues. We look forward to further opportunities to drive meaningful impact that addresses and mitigates the risks of climate change.

Our position on climate change

Truist is committed to supporting a sustainable, productive, and thriving society and economy. Climate change has multiple implications for our environment, communities, company, and clients, and can pose significant risks. Given our purpose to inspire and build better lives and communities, we embrace the opportunity to work within our organization and with our clients to transition to a low-carbon economy.

We are advancing this commitment by taking steps to reduce our own carbon emissions, investing in renewables, energy efficiency, and sustainable projects. We are also partnering with clients across all industry sectors to help drive innovation and support their transition plans.

Our commitment to progress

As a purpose-driven company, Truist is committed to actions and investments that build better lives and communities. We are proud of our progress thus far and will continue to make consistent progress on our corporate social responsibility (CSR) and environmental, social, and governance (ESG) goals.

Central to our commitment, Truist has made ESG a strategic priority companywide. Our executive leadership and board of directors have dedicated a greater share of their strategic focus and resources to ESG, and we continue to build our ESG capacity and infrastructure through thoughtful investments. This includes adding teammates with subject matter expertise and strengthening our ESG business, product, and service capabilities. The focus and additional resources will help Truist be even more responsive to clients and communities in their transitions to a low-carbon economy.

Additionally, we continue to identify opportunities to improve resource efficiency in our facilities and teammates' activities, and we encourage greater sustainability for our suppliers and partners. Recently, we announced our plan to achieve net zero greenhouse gas emissions by 2050 and laid out actionable items to reach this goal, including:

- **Calculating a financed emissions baseline** – We will calculate the financed emissions from our loans and investments utilizing the methodology from the Partnership for Carbon Accounting Financials (PCAF). These calculations will be integrated into underlying processes to improve the completeness and quality of the data to achieve higher-precision estimates.
- **Setting targets** – Truist has set 2030 goals to reduce Scope 1 and Scope 2 emissions by 35% each and to reduce water consumption by 25% relative to our 2019 baseline. We will continue to assess future corporate goals and targets—including dependencies on new policies and technology.
- **Investing in low-carbon technologies** – To spur on the transition to a decarbonized economy, we plan to significantly increase our investment in available and emerging low-carbon technologies and systems. Since 2017, Truist has invested \$56 million in energy efficiency projects.
- **Forming Truist's Climate Risk Management and ESG Working Group** – This group was established in 2021 to build more capacity and accelerate Truist's progress toward managing climate-related and ESG risks and opportunities.

We look forward to continuing to advance our net zero commitment through these initiatives and with partnership, collaboration, and balanced solutions

Working with our trade associations

Truist is a member of several national and state trade associations that represent business and financial services-related companies. Some of these associations engage in lobbying to promote sound and effective public policy and positions that fit the interests of their membership base as well as the broader business community.

An important part of due diligence is regularly evaluating these trade association relationships for alignment with our values. While we strive to ensure alignment on key policy matters with the associations we participate in, we recognize that as one of many members, Truist's policy positions may not always perfectly align with those of other member organizations or the positions of the association as a whole. In instances where that is the case, we are committed to sharing our concerns in a constructive manner and working within the organization toward greater alignment on policy issues that matter to members' collective stakeholders and support our purpose.

Following our early 2022 Net Zero announcement, Truist developed a monitoring protocol to review the climate legislation, advocacy, and lobbying activity of the principal trade associations we support. The goal of these reviews is to understand whether trade association positions and activities align with important climate measures including the Paris Climate Agreement, and whether trade association partners support our net zero commitments and climate initiatives.

The following report details the results of our comprehensive assessment. In our development of this report, we referenced the frameworks provided by the Interfaith Center on Corporate Responsibility (ICCR) and Ceres Company Network and our most current reporting under the Task Force on Climate-Related Financial Disclosures (TCFD) and Carbon Disclosure Project (CDP) frameworks.

Management oversight of trade association relationships

As part of Truist's involvement in the public policy process, we regularly express our views on policy matters to elected officials and their staff, as well as the principals and staff of various regulatory organizations on core banking, business, and economic advocacy. To facilitate these efforts, Truist employs in-house and outside registered lobbyists who either engage directly with these officials, coordinate the engagement of relevant Truist subject matter experts with them, or work with trade associations and informal organizations engaged with such officials and organizations in the policymaking process.

The public affairs team reports directly to Truist's chief legal officer and head of public affairs, who is a direct report to the chief executive officer. Truist's Executive Leadership annually reviews Truist's Statement of Political Engagement and receives reports that provide information on our trade association memberships, disbursements from Truist-sponsored PACs, contributions to any ballot measure committee, and lobbying activity. As part of its annual review, Executive Leadership provides oversight of large trade association memberships as well as political contributions and lobbying activities. Ensuring oversight, policies, and transparency around our public policy advocacy is a priority for Truist.

Board oversight of trade association relationships

The Nominating and Governance Committee of Truist's Board of Directors oversees our policies and practices relating to political contributions and lobbying. As part of this oversight, the Committee receives an annual review of the funding, governance, advocacy initiatives, and political contribution activities of the Truist-sponsored political action committees and expenditures relating to our major trade associations.

Compliance and monitoring

Truist is committed to complying with all applicable laws regarding political activity, including MSRB Rule G-37, SEC Rule 206(4)-5, CFTC Rule 23.451, and applicable state and local laws and regulations. We have policies and procedures in place consistent with this commitment. Truist maintains compliance processes intended to ensure that our activities are conducted in accordance with those policies, our Code of Ethics, and with all relevant laws governing political contributions and lobbying activities.

Further, we have an established process for reputational risk escalation and will use this to address any concerns that arise from ongoing monitoring of trade association partnerships. The Ethics, Business Practices, and Conduct Committee (EBPCC) which reviews all reputational risk assessment activity on a quarterly basis, will receive any escalated concerns and will serve as the decision-making body for any changes or actions. We conduct regular monitoring of our major trade associations' public statements and regulatory comments, including those on climate change, through our Government Relations, Enterprise Ethics, ESG and Corporate Communications teams.

Regular stakeholder engagement

Truist is actively engaged on climate matters, and we work with clients, shareholders, business partners, trade associations, and other stakeholders on climate-related issues in a variety of ways, including through regular discourse.

We are a member of several important groups taking action on climate change. In January 2022, Truist helped form the Risk Management Association's Climate Consortium Group, which is an alliance of 33 banks worldwide looking to advance awareness on climate and address

climate-related issues. In 2021, Truist joined the Ceres Company Network, an organization working to make the economy sustainable for years to come. In that same year, we became a member of the World Economic Forum's Trillion Tree Platform, which helps us build our Million Tree campaign via the Forum's LightStream Loan program. Additionally, we have aligned with the Partnership for Carbon Accounting Financials, which has allowed us to identify the quantity of greenhouse gas emissions that come from our loans and other payments. Lastly, Truist created a report aligned with the recommendations of the Task Force on Climate Related Financial Disclosures (TCFD) to increase reporting and monitoring of climate risks. As an active member of these organizations, we ensure that our climate goals are being advanced and that we are fulfilling our purpose of building better lives and communities.

Additionally, to better understand the position of our trade association partners on the issue of climate change, we issued a survey to all of our major trade associations in September 2022, which included key questions about each association's recent advocacy efforts on climate issues. The survey asked whether the associations provide members with resources to execute or support climate and other ESG initiatives. The survey encouraged each association to share its opinions about recent climate legislation and support of international efforts such as the Paris Agreement while also asking for opinions on renewable energy and fossil fuels. And lastly, the survey allowed our trade associations an accessible forum to share publications or comments regarding climate initiatives. The results from this survey were instrumental in shaping our assessment of these organizations and their alignment with Truist's climate objectives and statements on climate change. Details of this assessment can be found in pages [9-15](#) of this report.

Alignment with trade associations on climate goals

Methodology

Truist has monitored current major trade association lobbying efforts and assessed those efforts for alignment with our climate goals and public statements on climate change. In this case, “major trade associations” refers to any trade association or 501(c)(4) organization focused on federal advocacy and to which Truist pays annual membership fees or donations in excess of \$50,000. Major trade associations included in this report are:

- American Bankers Association
- American Financial Services Association
- Bank Policy Institute
- Business Roundtable
- Consumer Bankers Association
- Mortgage Bankers Association
- Risk Management Association
- Securities Industry and Financial Markets Association
- U.S. Chamber of Commerce

To determine alignment on climate goals, we have reviewed readily and publicly available activity from each of the trade associations including our engagement with many of the organizations through calls and other meetings. For the purpose of this summary, we relied on a partial year analysis developed during the 2022 calendar year and terminating on September 30. This includes a thorough analysis of:

- Legislation and regulations for any relevant climate bills that the trade associations have written comment letters in response to or have publicly commented on.

- Filings and disclosures for any lobbying activity by the trade associations on climate-related issues.
- Top-tier national, banking trade, and environmental trade media coverage, for relevant articles and mentions of the trade associations and their spokespeople in relation to climate.
- Feedback from our engagement on climate-related issues with trade associations in regular and ad-hoc meetings.
- Content on the trade associations’ websites and, where applicable, social media channels.
- Responses to a survey Truist sent to its major trade associations in September 2022 focused on recent advocacy on specific climate initiatives.

Climate survey

Truist shared a survey with our major trade associations on September 23, 2022 that asked specific questions about the trade associations’ positions on and activity related to climate lobbying, legislation, and regulation. Because some trade associations may not publicly share positions on climate change, the survey is a key part of our assessment. Questions included in this survey asked about the following:

- Whether member organizations are provided with tools or resources to support their climate initiatives (for example, guidance on ESG reporting frameworks)
- Current advocacy for or against any climate change or renewable energy-related legislation
- Support for the goals of the Paris Climate Agreement to limit global warming to well below 2 degrees Celsius
- Advocacy for or against any climate provisions in legislation, including the climate provisions in the Inflation Reduction Act
- Position on public and private fossil fuel financing and carbon intensive projects
- Additional publications or materials on climate change

Key monitoring issues

Truist maintains a variety of climate targets and ESG objectives. For this assessment, we prioritized evaluating alignment on a specific scope of what we identified to be critical climate topics:

- Position on climate change and climate change-related risks;
- Position on the goals of the Paris Climate Agreement;
- Position on climate provisions in recent legislation;
- Commitment to emissions reduction targets and investing in low-carbon technologies.

Assessment of alignment

Aligned associations are those that have, according to publicly available materials and survey responses:

- Similar positions to Truist on climate change;
- Similar positions to Truist on the Paris Climate Agreement;
- Similar positions to Truist on emissions reductions and investments in low-carbon technologies;
- No significant misalignments in other areas including positions on climate change policy.

Partially aligned associations are those that have at least one of the following:

- Share aspects of Truist’s position on climate change but advocate for a slightly different approach;
- Share aspects of Truist’s position the Paris Agreement but advocate for a slightly different approach;
- Share aspects of Truist’s position on emissions reductions and investments in low-carbon technologies but advocate for a slightly different approach;
- We found few public positions on climate-related issues;

- We found no external position on climate change or the Paris Climate Agreement, but through further direct engagement, identified alignment with Truist’s priorities.

Associations determined to be “not applicable” do not lobby on climate change-related issues and do not have public positions on our evaluation topics, according to their publicly available materials and survey responses.

None of the associations reviewed were unaligned. This label indicates that an association has stated opposition to one or multiple Truist climate goals and its other climate positions do not clearly align with Truist’s purpose.

Next steps

As the purpose of determining alignment with our trade associations is to evaluate and consider our participation and membership with each, we have determined subsequent action items for all four levels of alignment.

Status	Action plan
Aligned	Continue to monitor and assess the trade association’s practices; continue to actively engage and advocate for Truist’s climate goals.
Partially aligned	Continue to monitor and assess the trade association’s practices; review areas of potential engagement and advocacy for Truist’s climate goals; engage on areas of partial alignment.
Not Applicable	Continue to engage directly on the merits of advancing climate-related advocacy in the event the trade association is willing to take a position on the issue.
Not Aligned	Engage directly on this issue as appropriate and if necessary, re-evaluate membership. Continue to monitor public statements.

Findings

Through this assessment, we have concluded the majority of trade associations are aligned or partially aligned with Truist's climate goals. One association has been designated not applicable as it does not lobby on climate change-related issues, nor does it have public positions on climate change. We will continue to closely monitor and assess future actions for each in accordance with Truist's climate goals.

American Bankers Association (ABA)

Summary: The American Bankers Association describes itself in press releases as the voice of the nation's \$23.7 trillion banking industry, which is composed of small, regional, and large banks that together employ more than 2 million people, safeguard \$19.6 trillion in deposits and extend \$11.8 trillion in loans.¹ On its website, ABA identifies 25 issues that it promotes policy around, including climate change and banking.² Key aspects of the climate change and banking discussion where ABA specifically engages with policymakers include risk management and disclosure requirements, and business discretion.

In relation to risk management and disclosure requirements, ABA has recently engaged with the International Sustainability Standards Board (ISSB), the Securities and Exchange Commission (SEC), and California State Assembly on their respective climate-related disclosure proposals and legislation. As defined on ABA's website, "ABA believes that prudential regulations should continue to focus on actual risks banks face, and that regulators should develop standardized definitions and principle-based disclosure guidance focused on material risks. Bank regulators should focus on development of scenario analysis methodologies to accurately gauge both physical and transitional risks that will impact banks; and the development of needed disclosures to gain the information necessary to measure those risks. ABA will work to ensure that those disclosures do not overreach or inappropriately task banks with the collection of information beyond what is necessary to inform business and risk decisions."

With regard to business discretion, ABA notes on its website that, "banks should be able to continue to make their own decisions about who they will do business with, and who they won't, as long as that engagement is consistent with the law. If policy makers want to regulate fossil fuels or other industries further, they should do so directly through appropriate legislative and regulatory action, not indirectly through banks or other financial intermediaries."

Alignment: Partially Aligned

- ABA is aligned with Truist in acknowledging climate change as an issue that needs to be addressed with the support of careful and deliberate analysis.
- ABA is generally aligned with Truist in its support for consistent global disclosure frameworks that require disclosure of material, company-specific climate risks. Truist is continuing to watch ABA's public commentary and comment letters on measuring and disclosing carbon emissions and other climate-related risks.
- ABA's position on business discretion is generally aligned with Truist's objective to support a sustainable, productive, and thriving society and economy. We believe Truist has an important role to play as a partner to our clients across industry sectors to help support their energy transition plans and climate change-related innovations.
- We note that ABA provides members with climate change-related ABA and industry resources on its website to support better informed policy discussions around the issue of climate change and banking.

Position on climate change: As stated by ABA on its website, "America's banks recognize the growing concerns from policymakers, investors, customers, and others around climate change, including the impact on banks and the communities they serve from efforts to address climate-related financial risks. While there is

debate over the role banks can and should play in responding to climate-related financial risk, ABA believes common-sense, market-based solutions offer the best opportunity for addressing this worldwide issue. In addition, every effort should be made to prevent or minimize economic dislocation from policy and market changes, and to recognize the unique challenges facing financial institutions in energy-intensive communities. There is much more that needs to be learned about climate change, including how it affects our economy, which is why we support careful and deliberate study to inform the policy debate.”

American Financial Services Association (AFSA)

Summary: As noted on its website, the American Financial Services Association is the primary trade association for the consumer credit industry, protecting access to credit and consumer choice. AFSA provides the consumer credit industry and the consumers it services with a voice in Washington, D.C., where the association is headquartered, and access to the media and investment community. It also provides policy advice and issues management at both the federal and state level.³

Its mission is to promote safe, ethical lending to responsible, informed borrowers and to improve and protect consumers’ access to credit. Given this primary focus, AFSA does not identify any climate-related issues in either the 2022 federal⁴ or state⁵ priorities posted to its website.

Earlier in 2022, AFSA submitted a letter to the SEC on its proposed rulemaking on climate-risk disclosures in support of the SEC’s determination that the disclosure rules should not be applied to asset-backed securities issuers given the unique market structure of asset-backed securities.⁶

Alignment: Partially Aligned

- AFSA has not publicly shared many positions on climate change or climate change-related legislation. We recognize its primary focus is on improving consumer access to credit and therefore do not view this lack of public commentary as an indication of unalignment.

- AFSA’s commentary regarding the SEC’s proposed rulemaking on climate-risk disclosures was in agreement with what the SEC had proposed, indicating alignment with Truist’s support for consistent global disclosure frameworks that require disclosure of material, company-specific climate risks. Given AFSA’s engagement on this proposed rulemaking, we designated it as partially aligned despite its lack of a clear public position on climate change.
- Truist is continuing to watch AFSA’s commentary on measuring and disclosing carbon emissions and other climate-related risks, and whether AFSA will add climate-related topics to its federal and state priorities.

Position on climate change: Based on publicly available information, AFSA does not provide a clear position on the risks posed by climate change. AFSA’s mission is predominantly focused on protecting consumer access to credit and choice.

Bank Policy Institute (BPI)

Summary: The Bank Policy Institute describes itself as a nonpartisan public policy, research, and advocacy group, representing the nation’s leading banks and their customers. Its members include universal banks, regional banks, and the major foreign banks doing business in the United States. Collectively, its members employ almost 2 million Americans, make nearly half of the nation’s small business loans, and are an engine for financial innovation and economic growth.⁷

BPI regularly publishes blogs detailing its views on climate risk management and disclosure matters and this year, has submitted comments on proposals from organizations and legislators like the Federal Deposit Insurance Corporation, Financial Stability Board, the Securities and Exchange Commission, and the California State Assembly regarding these topics. Based on commentary in a prior BPI blogpost and BPI’s comment letters on proposals, BPI’s overarching position on climate risk guidance is that as an essential part of a smooth transition to a greener economy, banks need a flexible, risk-based approach from banking regulators to effectively

3. Source: www.afsaonline.org
4. Source: AFSA Federal Priorities 2022, www.afsaonline.org/wp-content/uploads/2022/02/AFSA-Federal-Priorities-2022.pdf
5. Source: AFSA 2022 State Priorities Master List, www.afsaonline.org/wp-content/uploads/2022/01/AFSA-SGA-2022-Priorities-Master-List.pdf
6. Source: AFSA comments on SEC proposed rule, <https://afsaonline.org/2022/06/16/afsa-comments-on-sec-climate-risk-disclosure-exemption/>
7. Source: www.bpi.com

support that transition.⁸ BPI additionally recognizes in its comments letters the need for consistent global disclosure frameworks that require disclosure of corporate-specific financially material data relating to climate risks.

Alignment: Aligned

- Like Truist, BPI acknowledges the risks of climate change and the importance of addressing this issue.
- According to its blogposts and comment letters, BPI is aligned with Truist on the importance of banking institutions in facilitating the transition to low-carbon technologies.
- BPI is aligned with Truist on the need for consistent global disclosure frameworks that require disclosure of material, company-specific climate risks. Truist is continuing to watch BPI's commentary on climate risk management and disclosure to ensure continued alignment

Position on climate change: In blogposts and comment letters, BPI has acknowledged the negative consequences of a warming planet. It also identifies banks as an important partner to clients in the transition to greener technologies. As such, BPI believes that climate policy should take account of the need to support the role of banks in facilitating the flow of capital to companies transitioning to low-carbon technologies and infrastructure investments.⁹ It therefore believes that certain policy tools that could direct capital allocation away from much needed transition financing should be avoided.

Business Roundtable (BRT)

Summary: On its website, Business Roundtable describes itself as an association of chief executive officers of America's leading companies working to promote a thriving U.S. economy and expanded opportunity for all Americans through sound public policy.¹⁰

BRT provides policy perspectives on a variety of issues including American energy in the 21st century, energy infrastructure, sustainability, and climate change. With regard to addressing climate change, BRT supports policies that build

on America's strengths in technology and energy diversity, encourage investment and innovation in its energy sector, and preserve environmental quality for the 21st century and beyond.

Earlier in 2022, BRT publicly opposed the Inflation Reduction Act (IRA), writing that it was opposed to the tax provisions, but that it supported the IRA's climate provisions, including clean energy incentivization.¹¹ BRT has publicly acknowledged that it believes congressional action on energy and climate change is critical to enabling the United States to lead the global transition to a greener economy.

Alignment: Partially Aligned

- According to statements on its website, BRT is aligned with Truist on the need to support the transition to low-carbon technologies.
- BRT believes that to avoid the worst impacts of climate change, the world must work together to meet the temperature increase goal set forth in the Paris Agreement.
- From our review of public material, BRT's opposition to the IRA was focused on the tax rather than climate provisions and does not indicate complete unalignment.
- While BRT has publicly urged the SEC to revise its proposed rule on climate disclosures, specifically regarding Scope 3 emissions disclosure requirements, we do not view this as an indication of unalignment as it shares our position on the importance of consistent global disclosure frameworks that require disclosure of material, company-specific climate risks. Truist is continuing to watch BRT's commentary on measuring and disclosing carbon emissions and other climate-related risks to ensure no shift in alignment.

Position on climate change: BRT recognizes the importance of global collaboration in the effort to limit global temperature rise this century to well below 2 degrees Celsius above preindustrial levels. It additionally supports a goal of reducing net U.S. greenhouse gas emissions by at least 80 percent from 2005 levels by 2050 in a manner consistent with thoughtful policy design and implementation that delivers long-term

8. Source: BPI Blog, www.bpi.com/bank-climate-risk-guidance-needs-flexibility
9. Source: BPI Statement, www.bpi.com/bpi-welcomes-dialogue-on-climate-related-risks-as-senate-banking-committee-holds-hearing
10. Source: www.businessroundtable.org
11. Source: BRT Press Release, www.businessroundtable.org/business-roundtable-opposes-the-inflation-reduction-act

environmental, social, and economic benefits, and minimizes potential negative impacts on businesses, workers, and households. BRT believes that a national market-based emissions reduction policy is critical to reducing greenhouse gas emissions to levels designed to avoid the worst effects and mitigate the impacts of climate change.¹²

Consumer Bankers Association (CBA)

Summary: The Consumer Bankers Association describes itself as the only member-driven trade association focused exclusively on retail banking. According to its website, its corporate members include the nation's largest retail banks, with 85% holding over \$10 billion in assets.¹³ CBA's associate members represent the premier providers of goods and services to banks. Its 14 standing committees, subcommittees, and working groups include top executives from its member banks with expertise in each segment of retail banking.

On its website, CBA lists its 2022 priorities, which includes advocating for sound banking policies to ensure the "continuation of a vibrant and strong consumer and small business banking sector."¹⁴ CBA also lobbies for diversity, equity, and inclusion, prioritizing "industry initiatives to achieve racial and gender equality and the availability of banking services to all communities."

Alignment: Not Applicable

- From our direct engagement with CBA and from its external materials, we determined that we are unable to apply our criteria to this association since CBA does not lobby on climate change-related issues, nor does CBA release statements on climate-related risks or disclosure.
- We will continue to directly engage and monitor CBA's stance on measuring and disclosing climate-related risks in the event its position changes.

Position on climate change: CBA does not provide a clear position on climate change

Mortgage Bankers Association (MBA)

Summary: The MBA describes itself as the leading advocate for the real estate finance industry, and represents and serves its members through a comprehensive array of capabilities and tools that enable members to successfully deliver fair, sustainable, and responsible real estate financing within ever-changing business environments.

MBA works for its members on climate and ESG through three channels: policy, research, and practice.¹⁵ MBA educates its members on federal ESG policies and engages in extensive research related to the intersection between real estate finance on climate change.

In direct conversations with Truist, MBA has shared that it is committed to working with policymakers on climate change and ESG policies that could have an impact on the real estate industry. In a June comment letter to the SEC on climate-related disclosures, MBA called itself "a proactive participant in policy and market developments on climate-related issues." However, it does not disclose its agendas when working with policymakers.

In a June 17 comment letter to the SEC, MBA suggested making Scope 3 emissions disclosures voluntary rather than mandatory, and limiting mandatory disclosure of Scope 3 emissions to companies that have set goals for reduction targets of such emissions, among other comments.¹⁶

Alignment: Partially Aligned

- We have designated MBA as partially aligned, as it is aligned with Truist on the importance of supporting the financing and advancement of low-carbon technologies but does not provide a clear external position on the risks posed by climate change, suggesting only partial alignment.

12. Source: www.businessroundtable.org

13. Source: www.consumerbankers.com

14. Source: www.consumerbankers.com

15. Source: MBA Frequently Asked Questions on Climate-Related Risk and ESG, www.mba.org/docs/default-source/cmf-policy/cmf-issue-briefs/cmf_pol_esg_and_climate_change_faqs03-10-22.pdf?sfvrsn=9ec165d_1

16. Source: MBA comments on proposed regulations on climate-related disclosure, www.mba.org/docs/default-source/residential-policy-letters/cmf_pol_mba-comment-to-sec-nprm-on-climate-related-disclosures-06-17-2022.pdf?sfvrsn=8f085be1_1

- While MBA has publicly urged the SEC to revise its proposed rule on climate disclosures, specifically regarding Scope 3 emissions disclosure requirements, we do not view this as an indication of unalignment as it shares our position on the importance of consistent global disclosure frameworks that require disclosure of material, company-specific climate risks.

Position on Climate Change: MBA confirmed in its survey response that it has not taken a public position on public and private fossil fuel financing and carbon intensive projects. In an ESG FAQ on its website, MBA recognizes climate-related financial risk and associated financial loss but does not directly acknowledge risks to the planet associated with climate change.

Risk Management Association (RMA)

Summary: RMA describes itself as a member-driven professional association whose sole purpose is to advance sound risk principles in the financial services industry. RMA helps its members use sound risk principles to improve institutional performance and financial stability, and enhance the risk competency of individuals through information, education, peer sharing, and networking.¹⁷

RMA regularly publishes comment letters on regulatory developments and legislation, including relevant climate-related regulation and legislation. On its website, RMA also publishes content related to climate change risk and ESG, but these are largely educational blog posts.

RMA has its own Climate Risk Consortium, a group of 19 banks (including Truist), whose mission is “advancing awareness of and addressing risks relevant to climate change.”¹⁸ The group develops frameworks and recommendations for governance, disclosure, and risk management.

Alignment: Aligned

- Aligned with Truist on the risks and challenges posed by climate change.

- Aligned with Truist on the importance of supporting the financing and advancement of renewable energy projects, specifically through legislation like the Community Reinvestment Act.
- Has established a Climate Risk Consortium for banks, which includes Truist, to create guidelines for embedding climate matters in risk management practices.

Position on climate change: RMA has publicly stated that action is needed to mitigate and respond to “the profound challenges brought by a warming climate.”¹⁹ RMA’s senior associate director additionally noted at a joint roundtable discussion co-hosted with the Cambridge Centre for Risk Studies that climate change will soon “grow to dominate the entire universe of risk,” adding that RMA is committed to offering critical resources and thought leadership on “what is clearly a top risk to the industry.”²⁰

Securities Industry and Financial Markets Association (SIFMA)

Summary: SIFMA describes itself as the leading trade association for broker-dealers, investment banks, and asset managers operating in the U.S. and global capital markets. On behalf of the industry’s one million employees, it advocates on legislation, regulation, and business policy affecting retail and institutional investors, equity, and fixed income markets and related products and services. It serves as an industry coordinating body to promote fair and orderly markets, informed regulatory compliance, and efficient market operations and resiliency. It also provides a forum for industry policy and professional development.²¹

SIFMA lobbies on a variety of issues including cybersecurity, diversity, equity, and inclusion, and various financial and climate-related legislation. SIFMA released a comment letter earlier this year on the SEC climate disclosure proposal suggesting several revisions to the requirements of the proposal, but expressed its overall support for climate-related disclosures. In addition to publicly noting its support for

18. Source: RMA website, <https://www.rmahq.org/about-us>

19. Source: RMA Climate Risk Consortia webpage, www.rmahq.org/climate-risk-consortia/?gmsopc=1

20. Source: RMA Press Release, www.rmahq.org/press-releases/2022/rma-forms-new-climate-risk-consortium-for-regional-banks/?gmsopc=1

21. Source: RMA Press Release, www.rmahq.org/press-releases/2021/rma-cambridge-centre-for-risk-studies-convene-chief-risk-officers-from-major-financial-institutions-to-prepare-for-climate-transition/

22. Source: www.sifma.org

climate-related financial risk frameworks, SIFMA has also emphasized the importance of a regulatory regime that is consistent and harmonious with other regulatory disclosures. The latter viewpoint is apparent in SIFMA's recent comments to the California State Assembly regarding Senate Bill 260.

Alignment: Aligned

- Aligned with Truist on the importance of supporting the financing and advancement of low-carbon technologies.
- Aligned with Truist's recognition of the risks of climate change.
- Aligned with Truist on the need for consistent global disclosure frameworks that require disclosure of material, company-specific climate risks. Truist is continuing to watch SIFMA's commentary on measuring and disclosing carbon emissions and other climate-related risks to monitor for continued alignment.

Position on climate change: In a 2021 press release statement alongside 10 other financial services trade associations, SIFMA shared principles for a U.S. transition to a low-carbon economy.²³ Those principles included:

- Set science-based climate policy goals that align with the Paris Agreement
- Increase and strengthen U.S. international engagement
- Provide clear long-term policy signals that foster innovation in financial services
- Price carbon and leverage the power of markets
- Minimize costs and support jobs in the transition
- Foster international harmonization of taxonomies, data standards and metrics
- Promote more robust climate disclosure and international standards
- Ensure climate-related financial regulation is risk-based
- Build capacity on climate risk modeling and scenario analysis

- Strengthen post-disaster recovery, risk mitigation and adaptation

U.S. Chamber of Commerce (USCC)

Summary: The U.S. Chamber of Commerce describes itself as the world's largest business organization. Its members range from the small businesses and chambers of commerce across the country that support its communities, to the leading industry associations and global corporations that innovate and solve for the world's challenges, to the emerging and fast-growing industries that are shaping the future. For the people across the businesses it represents, the USCC is a trusted advocate, partner, and network, helping to improve society and people's lives.²⁴

Earlier this year, the USCC expressed its public opposition to the tax provisions of the IRA. While it stated that it publicly supports the bill's climate and energy provisions, including Section 45Q, its emphasis on carbon capture, and its other clean energy provisions, the USCC ultimately issued a key vote letter to members of the U.S. House of Representatives urging them to vote against the legislation. The USCC also commented earlier this year on the SEC's proposed rulemaking. The USCC believes that in its current state, the proposed rules "produce extensive amounts of information that is not material, thus obscuring for investors what is most important to making informed voting and investment decisions and creating confusion and misimpressions."²⁵

Alignment: Partially Aligned

- Partially aligned due to the USCC's position on the IRA. While the USCC publicly recognized that parts of the bill would advance climate and energy security goals, it ultimately determined that benefits of climate-related provisions do not outweigh the negative impacts of the tax provisions.²⁶ This therefore does not reflect full alignment.
- The USCC is aligned with Truist in its support for climate policy that includes the disclosure of material information for investors' use.

23. Source: SIFMA Press Release, www.sifma.org/resources/news/sifma-alongside-10-trade-associations-publishes-principles-for-a-u-s-transition-to-a-low-carbon-economy/
 24. Source: www.uschamber.com
 25. Source: USCC comments on SEC proposed rule, www.uschamber.com/finance/u-s-chamber-comments-on-secs-proposed-rule-on-mandatory-climate-disclosures
 26. Source: USCC key vote letter to the House on the Inflation Reduction Act, www.uschamber.com/economy/u-s-chamber-key-vote-letter-to-the-house-on-the-inflation-reduction-act

- The USCC supports the formation of a collaborative effort between citizens, governments, and businesses to address climate change, which reflects Truist's purpose of building better lives and communities.

Position on climate change: As noted on its website, the USCC views climate change as an issue that requires action and collaboration between citizens, governments, and businesses.

Further, the USCC believes "that there is much common ground on which all sides of this discussion could come together to address climate change with policies that are practical, flexible, predictable, and durable. We believe in a policy approach that is supported by market-based solutions, developed through bipartisan legislation in Congress, and acknowledges the costs of action and inaction and the competitiveness of the U.S. economy. We work with policymakers to forge climate solutions and engage in the United Nations conference of parties (COP) on behalf of the business community."²⁷



27. Source: USCC climate webpage, www.uschamber.com/climate-change