

# Shaping our CSR priorities

# At Wells Fargo,

nearly all corporate social responsibility (CSR) topics are relevant to us. To prioritize topics that are most relevant to our company and to our stakeholders, we conduct CSR materiality assessments every three to five years. We conducted our first assessment in 2009, followed by assessments in 2013, and most recently in 2017. The results help us identify emerging sustainability issues, and inform our CSR strategy, goals, and reporting priorities.

### CSR materiality process

In 2017, we conducted a refreshed CSR materiality assessment to ensure that we are focusing on areas with the highest importance and relevance to our business and our stakeholders in light of changes in our business, new board and executive leadership, and heightened stakeholder feedback on current and emerging socioeconomic and environmental trends.

We conducted a review of existing topics from our 2013 assessment, and then identified additional topics through a comprehensive review of existing company and third-party research. Our evaluation included a review of global standards, including the Global Reporting Initiative (GRI), the United Nations Sustainable Development Goals (SDGs), the Sustainability Accounting Standards Board (SASB), and the Taskforce on Climate-related Financial Disclosures (TCFD).

This process, paired with results of our 2013 study, helped us to identify, evaluate, and prioritize a list of 34 potential CSR topics most relevant in the context of today's environment. We conducted a series of interviews with internal and external stakeholders, including nearly 50 Wells Fargo leaders and subject matter experts from across the company, as well as members of our external <u>Stakeholder Advisory Council</u>. The council includes a diverse mix of stakeholders, including groups focused on consumer rights, fair lending, the environment, human rights, civil rights, and governance (see page 17). The interviews were analyzed to identify key challenges, opportunities and linkages between topics, and resulted in a final list of 10 material CSR issues.

### CSR materiality results

While some areas have evolved, the results validate our existing priorities that will continue to comprise our CSR strategy: diversity and inclusion, economic empowerment, and environmental sustainability:

### DIVERSITY AND INCLUSION

Help ensure that all people feel valued and respected and have equal access to resources, services, products, and opportunities to succeed.

#### ECONOMIC EMPOWERMENT

Strengthen financial self-sufficiency and economic opportunities in underserved communities.

#### **ENVIRONMENTAL SUSTAINABILITY**

Accelerate the transition to a lower-carbon economy and help reduce the impacts of climate.

The assessment also identified topics that have increased in relevance to our company and stakeholders and where stakeholders would like to see more disclosure and dialogue: ethical practices and culture, corporate governance, transparency, customer privacy and cyber security, employment practices, human rights and climate change risk management, and disruption risk. Many of these topics are also addressed in Wells Fargo's 2018 Proxy Statement.

Combined, these topics make up Wells Fargo's refreshed understanding of our CSR priorities. The complete list of material topics is captured in the following table that also highlights the connections between CSR issues of most importance to our business and highest concern to our various stakeholder groups.

We are dedicated to continuous improvement and going forward, plan to integrate these findings into our CSR strategy, goals, commitments, and reporting (see page 9).

### STAKEHOLDERS TO WHICH TOPICS ARE RELEVANT -

Table A demonstrates what topics are relevant to which stakeholders. Table B provides definitions for each topic and summarizes why stakeholders find them important.

Table A

	STAKEHOLDERS TO WHICH TOPICS ARE RELEVANT							WHERE IN OUR BUSINESS IMPACTS OCCUR			
Material Topics*	Wells Fargo	Team members	Customers	Shareholders	Suppliers	Civil society/ communities	Policy makers	Products & services	Philanthropy	Culture & business practices**	
Ethical practices & culture	•	•	•	•	•	•	•	•	•	•	
Corporate governance	•	•	•	•	•	•	•	•	•	•	
Transparency	•	•	•	•		•	•	•	•	•	
Economic empowerment & community development	•	•	•	•		•	•	•	•	•	
Customer privacy & cyber security	•	•	•	•	•	•	•	•		•	
Employment practices	•	•	•	•		•	•	•		•	
Diversity & inclusion	•	•	•	•	•	•		•	•	•	
Environmental sustainability	•	•	•	•		•		•	•	•	
Human rights & climate change risk management	•	•	•	•	•	•	•	•		•	
Disruption risk	•	•	•	•	•	•	•	•		•	

<sup>\*</sup>Listed topics are interrelated. Please see definitions in the following table for details.

<sup>\*\*</sup> Includes supply chain, operations, human resources

# $Table\ B$

MATERIAL TOPIC DEFINITIONS	WHY STAKEHOLDERS IDENTIFY TOPIC AS IMPORTANT
Ethical practices and culture — Implementing our Code of Ethics and ensuring ethical behavior throughout our business practices striving to do no harm and to restore trust in our company.	Trust License to operate Risk reduction
Corporate governance — Strengthening our principles and practices on key governance issues, including incorporation of Environmental, Social and Governance (ESG) lens into all we do.	Financial stability Trust License to operate Risk reduction Economic stability Community stability Environmental stability
Transparency — Providing clear metrics and information in our financial and non-financial reporting and value creation that is decision-useful to key audiences and stakeholders.	Trust Investment decisions Regulator decisions
Economic empowerment & community development — Continuing 2016-2020 focus of strengthening economic sustainability of communities in which we operate by providing access to capital for projects and improvements aimed at enhancing economic, social, and environmental resiliency. Includes financial inclusion, capacity building, financial education and distribution of products and services.	Risk reduction Economic stability Community stability Environmental stability Innovation
Customer privacy & cyber security — Safeguarding customer data and privacy, avoiding data security breaches; responsible use of customer data.	Trust Individual economic stability
Diversity and inclusion — Continuing 2016-2020 focus of embracing diversity and creating an inclusive environment across our workforce, and in our interactions with customers, suppliers, communities, and other stakeholders.	Trust Innovation Economic stability Community stability Workplace empowerment Employee attraction, development, and retention
Employment practices — Striving to be a top workplace — e.g., hiring, retention, benefits, career development, and other support for our team members.	Trust Innovation Workplace empowerment Employee attraction, development, and retention Employee productivity

### Table B cont.

MATERIAL TOPIC DEFINITIONS	WHY STAKEHOLDERS IDENTIFY TOPIC AS IMPORTANT
Environmental sustainability — Continuing 2016-2020 focus of supporting the transition to a lower-carbon economy including through risk management, sustainable finance, community support, and in our operations.	Risk reduction Economic stability Community stability Environmental stability Innovation
Human rights & climate change risk management — Further developing procedures and systems, as well as fostering a mindset to better identify, understand, and mitigate risks associated with climate change and its impact on society and human rights, as it pertains to our employment practices, customers, financing, and supply chain.	Environmental stability & justice Economic stability Community stability Innovation
Disruption risk — Awareness and management of factors that have potential to rapidly disrupt banking as we know it today – e.g., emerging technologies, new market participants, regulations, societal attitudes and preferences, etc.	Financial stability Economic stability Community stability Innovation Workplace empowerment
customers, financing, and supply chain.  Disruption risk — Awareness and management of factors that have potential to rapidly disrupt banking as we know it today – e.g., emerging technologies, new market participants,	Financial stability Economic stability Community stability Innovation

# Wells Fargo 2020 CSR strategy and commitments

For each of our CSR priority areas, we have made commitments to measure our progress through a set of quantitative and qualitative key performance indicators. We provide regular updates on our progress and performance to the Corporate Responsibility Committee of Wells Fargo's Board of Directors (Board), and annual updates to key stakeholders through our annual CSR report which is available on the Goals and Reporting page of our website.

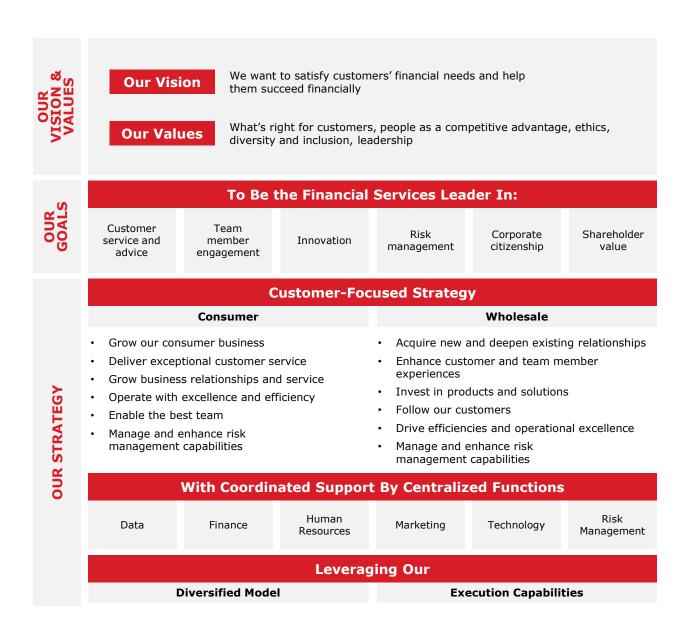
Our approach around identifying and establishing goals continues to evolve. In 2017, we undertook an analysis to understand how our CSR priorities and goals support a better, more sustainable world in <u>alignment with the SDGs</u>, which aim to end poverty, protect the planet, and ensure prosperity for all. We found strong alignment with several SDGs and as we continue to develop our approach, we will focus on those areas where we can provide the greatest contribution.

As part of our refreshed materiality in 2017, we revisited our established CSR goals to identify connections across all our material issues. Table C below shows examples of these connections.

	MATERIAL TOPICS									
	Ethical practices & culture	Corporate governance	Transparency	Economic empowerment & community development	Customer privacy & cyber security	Employment (hiring & retention)	Diversity & inclusion	Environmental sustainability	Human rights & climate change management	Disruption risk
2020 COMMITMENTS										
Deliver products and services that meet the needs, values, and preferences of our customers	•	•	•	•	•	•	•	•	•	•
Strengthen the economic sustainability of our communities	•	•	•	•		•	•	•	•	•
Accelerate a transition to a lower-carbon economy	•	•		•		•	•	•	•	•
Integrate environmental and social risk management into our business practices, and enhance reporting	•	•	•	•	•	•	•	•	•	•
Enhance awareness and expertise about Socially Responsible Investment (SRI)/ESG options within broker-dealer business		•	•			•	•	•	•	
Support critical social, economic, and environmental needs via philanthropy	•			•		•	•	•	•	
Ensure diversity, inclusion, respect, and engagement are fully woven into the fabric of the Wells Fargo culture and business practices	•	•	•	•	•	•	•		•	•
Strengthen the financial expertise and knowledge of our team members	•	•		•		•				
Enhance the environmental performance of our operations	•	•		•		•	•	•	•	•
Increase team member involvement in sustainability efforts	•	•				•	•	•	•	
Enhance sustainability and diversity of our supply chain, while building capacity through supplier development	•	•	•	•			•	•	•	•

## Management Approach

The chart below illustrates how our company's vision and values align with our six corporate goals, one of which is corporate citizenship. And while this goal is called out separately, there are CSR threads embedded in all six of the goals.



# Our management approach for CSR is as follows

### Our Commitment

The Vision, Values, and Goals of Wells Fargo

Material topics covered: Ethical practices & culture, Corporate governance and Transparency

We use <u>The Vision, Values, and Goals of Wells Fargo</u> to guide us toward growth and success. They are the foundation for how we do business.

Our Vision is to satisfy our customers' financial needs and help them succeed financially. Five values guide every action we take - what's right for customers, people as a competitive advantage, ethics, diversity and inclusion, and leadership.

We aspire to create deep and enduring relationships with our customers by providing them with an exceptional experience and by understanding their needs and delivering the most relevant products, services, advice, and guidance. In early 2017, our CEO and President Timothy J. Sloan also established six new aspirational goals for our company.

### IN 2017, WE RE-COMMITTED TO OUR VISION, VALUES, AND GOALS,

- Our Board reviewed and approved our Vision, Values, and Goals.
- We also reaffirmed our commitment to becoming a leader in corporate citizenship which is included among our six company goals. The goal also includes team member engagement (including diversity and inclusion), risk management, customer service and advice, innovation, and shareholder value.

As reflected in our company's six goals, we believe that being a good corporate citizen helps to drive the creation of long-term shareholder value.

### CSR priorities

 $Material\ topics\ covered-All$ 

To prioritize topics that are most relevant to our company and to our stakeholders, we conduct CSR materiality assessments every three to five years. See "CSR materiality process" and "CSR materiality results" above for more information.

# CSR management and governance

 $Material\ topics\ covered-All$ 

#### INDEPENDENT BOARD OVERSIGHT

Our Corporate Governance Guidelines

(wellsfargomedia.com/assets/pdf/about/corporate/governance-guidelines.pdf) provide the framework for the governance of the Board and our company, including our policies and processes for the functions, composition, and operations of our Board.

The <u>Corporate Responsibility Committee</u> (CRC) of our Board has primary oversight on significant social and public responsibility matters of interest to the company and its stakeholders and the company's relationships with its stakeholders.

The Board's <u>Human Resources Committee</u> (HRC) oversees the company's human capital management practices, including talent management, diversity and inclusion, pay equity reviews, culture, and ethics.

In 2017, the Board took a range of actions to enhance its composition, governance, and oversight practices, including amending charters and oversight responsibilities of various committees such as the Risk Committee, CRC, and HRC. Please see our 2018 Proxy Statement for a detailed overview.

### **CSR MANAGEMENT AND ACCOUNTABILITY**

Senior management is ultimately responsible for driving and leading our commitment to be a leader in corporate citizenship as reflected in our six company goals.

In evaluating executive performance and determining executive compensation, the HRC considers a variety of factors, including ethical considerations, diversity and inclusion, executive accountability, and other social responsibility issues.

Several of Wells Fargo's business functions and product teams have performance metrics that are directly linked to sustainability and corporate responsibility. For example, environmental performance and diversity and inclusion is considered when assessing the compensation of key leaders in our Supply Chain Management, Corporate Properties, Corporate Responsibility and Community Relations, and clean technology and sustainable finance corporate banking groups.

The Corporate Responsibility and Community Relations group oversees CSR strategy, goal setting, tracking and monitoring, as well as working to ensure CSR integration across the company.

Several enterprise-wide, management-level committees and policies provide additional oversight for CSR matters and drive initiatives to enhance business integration across our products and services, business practices and culture, and philanthropy. We also require training on key CSR topics.

Material topics covered – All

### **ENVIRONMENTAL AND SOCIAL RISK MANAGEMENT (ESRM)**

We seek to do business only with customers who demonstrate responsible management of their environmental and social risks. In 2017, we expanded our ESRM policies, which supplement our traditional due diligence practices, to help us more deeply understand how customers in certain sectors are managing these risks.

The ESRM team includes experts in assessing environmental and social risk relating to governance, policy and international standards, protocols around environmental and social risks and impacts, human rights, CSR, and transparency.

Our comprehensive policies now apply across all lines of business, including all subsectors of the oil and gas industry. In addition, we place a greater emphasis on evaluating a potential customer's commitment, capacity, and track record with regard to community engagement to ensure that the financial services we provide don't facilitate unacceptable impacts on communities or the environment. This approach includes specific triggers for additional due diligence for similarly broad social risk categories.

Beginning in 2017, all transactions subject to ESRM review were evaluated for compliance with our <u>Indigenous People's Statement</u>.

To more deeply integrate ESRM and its expanded scope into business practices across the company, the ESRM team significantly increased their training for internal stakeholders, and tailored information for specific roles and businesses. Also in 2017, ESRM staff began to engage with numerous external stakeholders, providing training to our clients and other audiences on ESRM best practices; the Wells Fargo due diligence process; International Finance Corporation Performance Standards and Sectoral Guidelines; stakeholder engagement; Free, Prior and Informed Consent; and contractor safety records, among others.

Material topics covered – Diversity & inclusion

# THE GOVERNANCE AND NOMINATING COMMITTEE (GNC) OF OUR BOARD OF DIRECTORS

The GNC is responsible for leading our director nomination process, which includes identifying, evaluating, and recommending candidates for election as directors.

The GNC will consider, in identifying first-time candidates or nominees for director, and in evaluating individuals recommended by shareholders, the current composition of our Board in light of the diverse communities and geographies we serve and the interplay of the candidate's or nominee's experience, education, skills, background, gender, race, ethnicity, and other qualities and attributes with those of the other Board members. The GNC also incorporates this broad view of diversity into its director nomination process by taking into account all of the factors above, in addition to having a diverse candidate pool for each director search the Board undertakes, when evaluating and recommending director nominees to serve on our Board so that our Board's composition as a whole appropriately reflects the current and anticipated needs of our Board and our Company.

In implementing its practice of considering diversity, the GNC may place more emphasis on attracting or retaining director nominees with certain specific skills or experience, such as industry, regulatory, operational, or financial expertise, depending on the circumstances and the composition of our Board at the time.

Gender, race, and ethnic diversity also have been, and will continue to be, a priority for the GNC and our Board in its director nomination process because the GNC and our Board believe that it is essential that the composition of our Board appropriately reflects the diversity of our Company's team members and the customers and communities they serve.

Material topics covered – Material topics covered – Employment practices, Human rights & climate change risk management

### THE ENTERPRISE DIVERSITY AND INCLUSION COUNCIL

The Enterprise Diversity and Inclusion Council, chaired by CEO and President Tim Sloan, is composed of senior leaders from across the company who partner with the operating committee to establish goals and set direction in the areas of team member diversity and inclusion, market segment diversity, supplier diversity, and regulatory and external reputation.

### THE ENTERPRISE ACCESSIBILITY PROGRAM OFFICE

The Enterprise Accessibility Program Office, launched in 2017, coordinates and advocates for accessibility initiatives throughout the company for team members and customers, including talent retention and opportunities for advancement for team members with diverse abilities. All managers, supervisors, and HR professionals are required to participate in training biannually that covers Wells Fargo's policies concerning equal opportunity and affirmative action.

Material topics covered — Ethical practices & culture, Corporate governance and Transparency

### THE CONDUCT MANAGEMENT OFFICE

The Conduct Management Office centralizes the handling of complaints, internal investigations, ethics, allegations, and sales practices oversight.

All team members, including executive officers, are required to complete annual training to recertify their compliance and understanding of the <u>Wells Fargo Code of Ethics and Business Conduct</u> (the Code), our Vision and Values, and their responsibilities to adhere to the Code and report any ethical concerns.

We now have an Allegation Management Policy that addresses confidentiality and consistency and sets the standards and procedures for all intake channels, which means everyone is caring for concerns the same way. The policy includes requirements to enhance process quality and oversight and identify and address the root causes of reported issues.

We also have the new Speak up and Nonretaliation Policy that sets expectations for all team members to raise concerns and for managers to help them feel safe and supported when they do. We have zero tolerance for retaliation against team members for reporting suspected ethical issues, and anyone found to have retaliated will be subject to appropriate corrective action.

We have also made progress in improving how team member concerns are being managed, including a new dedicated Employee Relations team focused on issues raised through the EthicsLine; a new process for third-party legal review of retaliation claims; standard protocols across research and investigative teams to ensure consistency; and updated messaging and website enhancements with the EthicsLine vendor. Additionally, we're creating a new EthicsLine website to make it easier for team members to submit a report online at their convenience.

To enforce our zero tolerance for corrupt behavior, our Anti-Corruption Policy helps ensure compliance with applicable laws related to bribery or corruption. Anti-Bribery and Corruption training is also required annually to help team members recognize and mitigate bribery and corruption risk.

Material topics covered — Ethical practices & culture, Corporate governance and Transparency

### THE WELLS FARGO FOUNDATION BOARD OF DIRECTORS

The Wells Fargo Foundation Board of Directors is responsible for providing oversight and management of Wells Fargo's philanthropy, as well as approving enterpriselevel grants.

We are committed to continually evolving our approach to corporate philanthropy to ensure we are positively impacting our communities and effectively responding to significant CSR matters.

- In 2016, we began transitioning our approach to strategic philanthropy to strengthen alignment with our CSR priorities of diversity and inclusion, economic empowerment, and environmental sustainability.
- Our company and the Wells Fargo Foundation provide monetary support, expertise, and volunteers to national and local nonprofit organizations and causes.

Our corporate philanthropy program provides flexibility for regional investments which are determined by local Contributions Committees to ensure we are meeting the local community needs

 $Material\ topics\ covered-Environmental\ sustainability,\ Human\ rights\ \&\ climate\ change\ management$ 

### **ENVIRONMENTAL AFFAIRS**

Environmental Affairs is accountable for implementing the company's environmental sustainability strategy throughout our business. This includes prioritizing doing our part to help accelerate the transition to a low-carbon economy and helping reduce the impacts of climate change on our world, as outlined in our <u>Statement on Climate Change</u>.

We support the <u>Paris Climate Accord's</u> goal to reduce global greenhouse gas emissions and we undertake ambitious efforts in collaboration with the private and public sector to do our part to achieve this goal. We are committed to following industry best practices and are a member, signatory, or subscriber to external initiatives like the Equator Principles, eStewards, Green Bond Principles, LEED®, RE100, and United Nations Principles for Responsible Investing. We use the U.S. Environmental Protection Agency's definition of "green power" for our definition of "renewable energy." We report risks and opportunities associated with climate change via the CDP and are incorporating the for Climate-related Financial Disclosures recommendations in our efforts.

Material topics covered – Customer privacy & cyber security, Disruption risk

### **INFORMATION SECURITY**

Information security is a top priority for everyone at Wells Fargo and we are consistently enhancing our security measures and identifying new and emerging threats to help keep accounts and information secure. For more information, see the <u>Privacy</u>, <u>Security</u>, and <u>Legal section</u>.

Material topics covered - All

### **UPDATE OR ADOPT POLICIES AND STANDARDS**

To support further integration of CSR into our business, we regularly review established policies, positions, and practices to identify potential enhancements. We adopt third-party best practices as appropriate.

In 2017, we updated the Wells Fargo <u>Code of Ethics and Business Conduct</u> (the Code) to further strengthen language regarding the Ethics Line and non-retaliation policies.

# Stakeholder engagement

Material topics covered – All

We invite feedback and open dialog from a broad range of internal and external stakeholders to help us understand their perspectives on current and emerging issues and our CSR priorities. We aim to be open and transparent about our progress, as well as about the challenges we face.

Our engagement with key stakeholder occurs year-round through a variety of mechanisms, with the primary goal of building relationships, listening to and understanding their perspectives, and helping communicate our strategy and performance.

### **ENHANCING ENGAGEMENT WITH KEY STAKEHOLDERS**

In 2017 we enhanced our engagement efforts with key stakeholders:

- We formed our external <u>Stakeholder Advisory Council</u> to provide our Board and senior management with feedback from a stakeholder perspective. The council's focus will be to deepen the company's understanding of important current and emerging issues relevant to the company and its stakeholders, including serving the financial needs of underserved communities, diversity and inclusion, and environmental sustainability.
- We also formed a new Stakeholder Relations group to foster a more integrated approach to engaging our key stakeholders. The Stakeholder Relations group will partner with other groups in the company to build and execute a comprehensive, fully integrated stakeholder relations program. The group includes Investor Relations and Government Relations. It will help coordinate engagement efforts in collaboration with Corporate Responsibility and Community Relations, the Wells Fargo Foundation, the Wells Fargo Housing Foundation, and other business and product groups.
- We continued to actively seek feedback from and listen to our team members through channels such as team member "pulse" surveys and focus groups. For more information, see pages 7-10 of the <u>2018</u> <u>Proxy Statement</u>.

# Stakeholder engagement

 $Material\ topics\ covered-All$ 

### TAKING ACTION ON STAKEHOLDER FEEDBACK

The constructive and candid feedback we receive from our key stakeholders is important and informs our CSR priorities, strategy, and progress throughout the year. Our company has taken a number of actions over the last several years that are the result of stakeholder feedback. For example, Wells Fargo:

- Worked with tribal leaders, indigenous stakeholders, and their representatives to develop an <u>Indigenous Peoples Statement (IPS)</u> that helps guide our decision-making on projects where proceeds of Wells Fargo financing has the potential to impact Native American, Native Alaskan, or other indigenous communities (see page 11).
- Disclosed additional information on our company's gender and racial/ethnic pay gaps in the U.S. on our <u>website</u>. We have committed to expand our pay equity reviews to other geographic areas of operation in the future, make compensation adjustments in line with a goal of gender pay equity, and review a report on pay gaps on an annual basis.

Additional examples of our demonstrated track record of responsiveness to investors and other stakeholders can be found beginning on page 16 of our <u>2018 Proxy Statement</u>.

# Measuring, monitoring, and reporting our progress

 $Material\ topics\ covered-All$ 

For each of our CSR priority areas, we have made commitments to be accomplished by 2020. See "Wells Fargo 2020 CSR strategy and commitments" earlier in this document.

In 2016, we transitioned to a new CSR commitment and established goals to be accomplished in medium— to longer-term time frames between 2016 and 2020.

The Board's Corporate Responsibility Committee reviewed and ratified our 2020 CSR goals, and reviews progress at least annually. Our operating committee conducts reviews more frequently.

# Measuring, monitoring, and reporting our progress

 $Material\ topics\ covered-All$ 

We are committed to continuous improvement. This includes benchmarking our performance on an ongoing basis and making updates to our established CSR goals, as needed.

For example, in 2017:

- We set a new long-term commitment to increase corporate philanthropy by 40 percent in 2018, and beginning in 2019, we will target investing two percent of our after-tax profits in corporate philanthropy.
- We expanded the Wells Fargo Works Diverse Community Capital program and target investing \$100 million over three years, beginning in 2018, to provide access to capital, technical assistance, and other support to diverse small businesses.

### ALIGNMENT WITH THE SUSTAINABLE DEVELOPMENT GOALS

See "Wells Fargo 2020 CSR strategy and commitments" earlier in this document.

#### TRANSPARENCY AND DISCLOSURES

We are committed to being transparent with our key stakeholders about our progress and performance on our 2020 CSR goals and other CSR matters on an ongoing basis.

- We disclose our progress and performance through annual <u>CSR reporting</u>.
   Wells Fargo prepares a full CSR report in accordance with global standards for CSR reporting every two years, and a succinct update report in interim years.
- We communicate regularly regarding significant milestones on wellsfargo.com and Wells Fargo stories. For example, in 2017, we provided an update <u>on our commitment to power our global operations with 100</u> percent renewable energy.

We launched our new <u>Environmental</u>, <u>Social</u>, <u>and Governance</u> (<u>ESG</u>) <u>Guide</u> in March 2017 to consolidate disclosures on our website on a broad range of ESG matters.