

TWO THOUSAND THIRTEEN

CORPORATE SOCIAL  
RESPONSIBILITY

*Global Reporting*

*Initiative 3.1*

*Content Index*



**Northern Trust**

## STANDARD DISCLOSURES PART I: PROFILE DISCLOSURES

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
<b>Strategy and Analysis</b>				
1.1	Statement from the most senior decision-maker of the organization.	Fully	5, 6	–
1.2	Description of key impacts, risks and opportunities.	Fully	5–8	–
<b>Organizational Profile</b>				
2.1	Name of the organization.	Fully	14	–
2.2	Primary brands, products and/or services.	Fully	14, 15	–
2.3	Operational structure of the organization, including main divisions, operating companies, subsidiaries and joint ventures.	Fully	14, 15	–
2.4	Location of organization's headquarters.	Fully	14	–
2.5	Number of countries where the organization operates and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.	Fully	14, 15	–
2.6	Nature of ownership and legal form.	Fully	14	–
2.7	Markets served (including geographic breakdown, sectors served and types of customers/beneficiaries).	Fully	14, 15	–
2.8	Scale of the reporting organization.	Fully	4	–
2.9	Significant changes during the reporting period regarding size, structure or ownership.	Fully	44	–
2.10	Awards received in the reporting period.	Fully	9	–
<b>Report Parameters</b>				
3.1	Reporting period (e.g., fiscal/calendar year) for information provided.	Fully	44	–
3.2	Date of most recent previous report (if any).	Fully	44	–
3.3	Reporting cycle (annual, biennial, etc.)	Fully	44	–
3.4	Contact point for questions regarding the report or its contents.	Fully	44	–
3.5	Process for defining report content.	Fully	7, 8, 44	–
3.6	Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers). See GRI Boundary Protocol for further guidance.	Fully	44	–

## STANDARD DISCLOSURES PART I: PROFILE DISCLOSURES (CONTINUED)

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
3.7	State any specific limitations on the scope or boundary of the report (see completeness principle for explanation of scope).	Fully	44	–
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations and other entities that can significantly affect comparability from period to period and/or between organizations.	Fully	44	–
3.9	Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the Indicators and other information in the report. Explain any decisions not to apply, or to substantially diverge from, the GRI Indicator Protocols.	Fully	44	–
3.10	Explanation of the effect of any re-statements of information provided in earlier reports and the reasons for such re-statement (e.g., mergers/acquisitions, change of base years/periods, nature of business, measurement methods).	Fully	44	–
3.11	Significant changes from previous reporting periods in the scope, boundary or measurement methods applied in the report.	Fully	44	–
3.12	Table identifying the location of the Standard Disclosures in the report.	Fully	<a href="https://www.northerntrust.com/about-us/corporate-social-responsibility">https://www.northerntrust.com/about-us/corporate-social-responsibility</a>	–
3.13	Policy and current practice with regard to seeking external assurance for the report.	Fully	44	–
<b>Governance, Commitments and Engagement</b>				
4.1	Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight.	Fully	15–18	–
4.2	Indicate whether the chair of the highest governance body is also an executive officer.	Fully	15	–
4.3	For organizations that have a unitary board structure, state the number and gender of members of the highest governance body that are independent and/or non-executive members.	Fully	15	–

## STANDARD DISCLOSURES PART I: PROFILE DISCLOSURES (CONTINUED)

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	Fully	<a href="https://www.northerntrust.com/about-us/investor-relations/corporate-governance/board-of-directors/contact">https://www.northerntrust.com/about-us/investor-relations/corporate-governance/board-of-directors/contact</a>	–
4.5	Linkage between compensation for members of the highest governance body, senior managers and executives (including departure arrangements), and the organization's performance (including social and environmental performance).	Fully	15–18	–
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	Fully	15–18	–
4.7	Process for determining the composition, qualifications and expertise of the members of the highest governance body and its committees, including any consideration of gender and other indicators of diversity.	Fully	15–18	–
4.8	Internally developed statements of mission or values, codes of conduct and principles relevant to economic, environmental and social performance and the status of their implementation.	Fully	<a href="http://www.northerntrust.com/csr">www.northerntrust.com/csr</a>	–
4.9	Procedures of the highest governance body for overseeing the organization's identification and management of economic, environmental and social performance, including relevant risks and opportunities and adherence or compliance with internationally agreed standards, codes of conduct and principles.	Fully	15–18	–
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental and social performance.	Fully	15–18	–
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organization.	Fully	15–18	–
4.12	Externally developed economic, environmental and social charters, principles or other initiatives to which the organization subscribes or endorses.	Fully	10	–

## STANDARD DISCLOSURES PART I: PROFILE DISCLOSURES (CONTINUED)

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
4.13	Memberships in associations (such as industry associations) and/or national/international advocacy organizations in which the organization: <ul style="list-style-type: none"> <li>■ Has positions in governance bodies;</li> <li>■ Participates in projects or committees;</li> <li>■ Provides substantive funding beyond routine membership dues; or</li> <li>■ Views membership as strategic.</li> </ul>	Fully	10	–
4.14	List of stakeholder groups engaged by the organization.	Fully	19	–
4.15	Basis for identification and selection of stakeholders with whom to engage.	Fully	19	–
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	Fully	18–19	–
4.17	Key topics and concerns that have been raised through stakeholder engagement and how the organization has responded to those key topics and concerns, including through its reporting.	Fully	7, 8	–

## STANDARD DISCLOSURES PART II: DISCLOSURES ON MANAGEMENT APPROACH (DMAs)

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
<b>DMA PS</b>	<b>Disclosure on Management Approach PS</b>			
Aspect	Product portfolio	Fully	22-25	-
FS1	Policies with specific environmental and social components applied to business lines.	Fully	22-25	-
FS2	Procedures for assessing and screening environmental and social risks in business lines.	Fully	22-25	-
FS3	Processes for monitoring clients' implementation of and compliance with environmental and social requirements included in agreements or transactions.	Fully	22-25	-
FS4	Process(es) for improving staff competency to implement the environmental and social policies and procedures as applied to business lines.	Fully	22-25	-
FS5	Interactions with clients/ investees/business partners regarding environmental and social risks and opportunities.	Fully	22-25	-
Aspect	Audits	Fully	22 - 25	-
Aspect	Active ownership	Fully	22 - 25	-
<b>DMA EC</b>	<b>Disclosure on Management Approach EC</b>			
Aspects	Economic performance	Fully	26-29	-
	Market presence	Fully	14-16	-
	Indirect economic impacts	Fully	26-29	-

## STANDARD DISCLOSURES PART II: DISCLOSURES ON MANAGEMENT APPROACH (DMAs) (CONTINUED)

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
<b>DMA EN</b>	<b>Disclosure on Management Approach EN</b>			
Aspects	Materials	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
	Energy	Fully	36–43	–
	Water	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
	Biodiversity	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
	Emissions, effluents and waste	Fully	36–43	–
	Products and services	Fully	36–43	–
	Compliance	Fully	36–43	–
	Transport	Fully	36–43	–
	Overall	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
<b>DMA LA</b>	<b>Disclosure on Management Approach LA</b>			
Aspects	Employment	Fully	30–35	–
	Labor/management relations	Fully	30–35	–
	Occupational health and safety	Fully	30–35	–
	Training and education	Fully	30–35	–
	Diversity and equal opportunity	Fully	30–35	–
	Equal remuneration for women and men	Not	–	Proprietary Information – Northern Trust currently does not report further on the ratio of basic salary and remuneration of women to men by employee category or by significant locations of operation.

## STANDARD DISCLOSURES PART II: DISCLOSURES ON MANAGEMENT APPROACH (DMAs) (CONTINUED)

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
<b>DMA HR</b>	<b>Disclosure on Management Approach HR</b>			
Aspects	Investment and procurement practices	Fully	31–33	–
	Non-discrimination	Fully	31	–
	Freedom of association and collective bargaining	Fully	31	–
	Child labor	Fully	31	–
	Prevention of forced and compulsory labor	Fully	31	–
	Security practices	Fully	31	–
	Indigenous rights	Fully	31	–
	Assessment	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
	Remediation	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.



## STANDARD DISCLOSURES PART II: DISCLOSURES ON MANAGEMENT APPROACH (DMAs) (CONTINUED)

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
<b>DMA SO</b>	<b>Disclosure on Management Approach SO</b>			
Aspects	Local communities	Fully	26–29	–
	Corruption	Fully	18	–
	Public policy	Fully	27–29	–
	Anti-competitive behavior	Fully	Northern Trust’s policy is to comply with all applicable laws and regulations in all countries where we operate.  Northern Trust Corporation is a public company and is required to file periodic reports with the Securities and Exchange commission (SEC), including reports on Forms 10-Q and 10-K.  The filings can be found here: <a href="https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings">https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings</a>	–
	Compliance	Fully	Northern Trust’s policy is to comply with all applicable laws and regulations in all countries where we operate.  Northern Trust Corporation is a public company and is required to file periodic reports with the Securities and Exchange commission (SEC), including reports on Forms 10-Q and 10-K.  The filings can be found here: <a href="https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings">https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings</a>	–
<b>DMA PR</b>	<b>Disclosure on Management Approach PR</b>			
Aspects	Customer health and safety	Not	–	We do not report this disclosure item, as it is not applicable to our business because, as a financial services firm, we have no products or services that are assessed.
	Product and service labelling	Not	–	We do not report this disclosure item, as it is not applicable to our business because, as a financial services firm, we have no products or services with labeling.
FS15	Policies for the fair design and sale of financial products and services.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
	Marketing communications	Fully	20	–
	Customer privacy	Fully	21	–
	Compliance	Fully	20, 21	–

## STANDARD DISCLOSURES PART III: PERFORMANCE INDICATORS

### Product and Service Impact

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
<b>Product portfolio</b>				
FS6	Percentage of the portfolio for business lines by specific region, size (e.g. micro/SME/large) and by sector.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
FS7	Monetary value of products and services designed to deliver a specific social benefit for each business line broken down by purpose.	Fully	<a href="https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2013.pdf">https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2013.pdf</a> , pps. 22–35	–
FS8	Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
<b>Audit</b>				
FS9	Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures.	Fully	Northern Trust completes an annual review of its GHG emissions. In 2012 and 2013 this information received third-party assurance from Deloitte & Touche LLP. The assurance was completed in accordance with attestation standards established by the American Institute of Certified Public Accountants.  The statement can be found at: <a href="http://www.northerntrust.com/csr">www.northerntrust.com/csr</a>	–
<b>Active ownership</b>				
FS10	Percentage and number of companies held in the institution's portfolio with which the reporting organization has interacted on environmental or social issues.	Not	–	We do not report this disclosure item as the information is proprietary.
FS11	Percentage of assets subject to positive and negative environmental or social screening.	Fully	24	–
FS12	Voting polic(ies) applied to environmental or social issues for shares over which the reporting organization holds the right to vote shares or advises on voting.	Fully	<a href="https://www.northerntrust.com/documents/annual-reports/northern-trust-proxy-statement-2014.pdf?bc=23333603">https://www.northerntrust.com/documents/annual-reports/northern-trust-proxy-statement-2014.pdf?bc=23333603</a>	–

## STANDARD DISCLOSURES PART III: PERFORMANCE INDICATORS (CONTINUED)

### Economic

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
<b>Economic performance</b>				
EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings and payments to capital providers and governments.	Fully	Donations and Community Investments Table 1 – p. 29 (Northern Trust CSR Annual Report) All other figures can be found on p. 4 of the Northern Trust Annual CSR Report and p. 10 of the Northern Trust Annual Report at: <a href="https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2013.pdf">https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2013.pdf</a> Northern Trust did not receive financial assistance from the government in 2013.	–
EC2	Financial implications and other risks and opportunities for the organization’s activities due to climate change.	Fully	See Northern Trust CDP submission at <a href="https://www.northerntrust.com/documents/reports/2013-cdp-submission.pdf">https://www.northerntrust.com/documents/reports/2013-cdp-submission.pdf</a>	–
EC3	Coverage of the organization’s defined benefit plan obligations.	Fully	<a href="https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2013.pdf">https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2013.pdf</a> pps. 28–9 and 96–98	–
EC4	Significant financial assistance received from government.	Fully	Northern Trust did not receive financial assistance from the government in 2013.	–
<b>Market presence</b>				
EC5	Range of ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
EC6	Policy, practices and proportion of spending on locally based suppliers at significant locations of operation.	Fully	20	–
EC7	Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation.	Fully	32	–
<b>Indirect economic impacts</b>				
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind or pro bono engagement.	Fully	28	–
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts.	Fully	26–29	–

## STANDARD DISCLOSURES PART III: PERFORMANCE INDICATORS (CONTINUED)

### Environmental

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
<b>Materials</b>				
EN1	Materials used by weight or volume.	Not	–	Northern Trust continues to assess our global operations to identify opportunities to operate efficiently and quantify our environmental impact.  The assessment includes engaging key stakeholders through various methods. During our 2013 assessment of non-financial aspects of most significance, our key stakeholders did not highlight the GRI 3.1 environmental performance indicators.
EN2	Percentage of materials used that are recycled input materials.	Not	–	Northern Trust continues to assess our global operations to identify opportunities to operate efficiently and quantify our environmental impact.  The assessment includes engaging key stakeholders through various methods. During our 2013 assessment of non-financial aspects of most significance, our key stakeholders did not highlight the GRI 3.1 environmental performance indicators.
<b>Energy</b>				
EN3	Direct energy consumption by primary energy source.	Fully	Fuel 2,470.32 MWh See Northern Trust CDP submission at <a href="https://www.northerntrust.com/documents/reports/2013-cdp-submission.pdf">https://www.northerntrust.com/documents/reports/2013-cdp-submission.pdf</a>	–
EN4	Indirect energy consumption by primary source.	Fully	Electricity 97,731.88 MWh Heat 8,960.21 MWh See Northern Trust CDP submission at <a href="https://www.northerntrust.com/documents/reports/2013-cdp-submission.pdf">https://www.northerntrust.com/documents/reports/2013-cdp-submission.pdf</a>	–
EN5	Energy saved due to conservation and efficiency improvements.	Fully	See Northern Trust CDP submission at <a href="https://www.northerntrust.com/documents/reports/2013-cdp-submission.pdf">https://www.northerntrust.com/documents/reports/2013-cdp-submission.pdf</a>	–
EN6	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
EN7	Initiatives to reduce indirect energy consumption and reductions achieved.	Fully	See Northern Trust CDP submission at <a href="https://www.northerntrust.com/documents/reports/2013-cdp-submission.pdf">https://www.northerntrust.com/documents/reports/2013-cdp-submission.pdf</a>	–

## STANDARD DISCLOSURES PART III: PERFORMANCE INDICATORS (CONTINUED)

### Environmental

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
<b>Water</b>				
EN8	Total water withdrawal by source.	Not	–	<p>Northern Trust continues to assess our global operations to identify opportunities to operate efficiently and quantify our environmental impact.</p> <p>The assessment includes engaging key stakeholders through various methods. During our 2013 assessment of non-financial aspects of most significance, our key stakeholders did not highlight the GRI 3.1 environmental performance indicators.</p>
EN9	Water sources significantly affected by withdrawal of water.	Not	–	<p>Northern Trust continues to assess our global operations to identify opportunities to operate efficiently and quantify our environmental impact.</p> <p>The assessment includes engaging key stakeholders through various methods. During our 2013 assessment of non-financial aspects of most significance, our key stakeholders did not highlight the GRI 3.1 environmental performance indicators.</p>
EN10	Percentage and total volume of water recycled and reused.	Not	–	<p>Northern Trust continues to assess our global operations to identify opportunities to operate efficiently and quantify our environmental impact.</p> <p>The assessment includes engaging key stakeholders through various methods. During our 2013 assessment of non-financial aspects of most significance, our key stakeholders did not highlight the GRI 3.1 environmental performance indicators.</p>
<b>Biodiversity</b>				
EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas.	Not	–	<p>Northern Trust continues to assess our global operations to identify opportunities to operate efficiently and quantify our environmental impact.</p> <p>The assessment includes engaging key stakeholders through various methods. During our 2013 assessment of non-financial aspects of most significance, our key stakeholders did not highlight the GRI 3.1 environmental performance indicators.</p>

## STANDARD DISCLOSURES PART III: PERFORMANCE INDICATORS (CONTINUED)

### Environmental

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
EN12	Description of significant impacts of activities, products and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	Not	–	<p>Northern Trust continues to assess our global operations to identify opportunities to operate efficiently and quantify our environmental impact.</p> <p>The assessment includes engaging key stakeholders through various methods. During our 2013 assessment of non-financial aspects of most significance, our key stakeholders did not highlight the GRI 3.1 environmental performance indicators.</p>
EN13	Habitats protected or restored.	Not	–	<p>Northern Trust continues to assess our global operations to identify opportunities to operate efficiently and quantify our environmental impact.</p> <p>The assessment includes engaging key stakeholders through various methods. During our 2013 assessment of non-financial aspects of most significance, our key stakeholders did not highlight the GRI 3.1 environmental performance indicators.</p>
EN14	Strategies, current actions and future plans for managing impacts on biodiversity.	Not	–	<p>Northern Trust continues to assess our global operations to identify opportunities to operate efficiently and quantify our environmental impact.</p> <p>The assessment includes engaging key stakeholders through various methods. During our 2013 assessment of non-financial aspects of most significance, our key stakeholders did not highlight the GRI 3.1 environmental performance indicators.</p>
EN15	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk.	Not	–	<p>Northern Trust continues to assess our global operations to identify opportunities to operate efficiently and quantify our environmental impact.</p> <p>The assessment includes engaging key stakeholders through various methods. During our 2013 assessment of non-financial aspects of most significance, our key stakeholders did not highlight the GRI 3.1 environmental performance indicators.</p>

## STANDARD DISCLOSURES PART III: PERFORMANCE INDICATORS (CONTINUED)

### Environmental

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
<b>Emissions, effluents and waste</b>				
EN16	Total direct and indirect greenhouse gas emissions by weight.	Fully	See Northern Trust CDP submission at <a href="https://www.northerntrust.com/documents/reports/2013-cdp-submission.pdf">https://www.northerntrust.com/documents/reports/2013-cdp-submission.pdf</a>	–
EN17	Other relevant indirect greenhouse gas emissions by weight.	Fully	See Northern Trust CDP submission at <a href="https://www.northerntrust.com/documents/reports/2013-cdp-submission.pdf">https://www.northerntrust.com/documents/reports/2013-cdp-submission.pdf</a>	–
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved.	Fully	40	–
EN19	Emissions of ozone-depleting substances by weight.	Not	–	Northern Trust continues to assess our global operations to identify opportunities to operate efficiently and quantify our environmental impact.  The assessment includes engaging key stakeholders through various methods. During our 2013 assessment of non-financial aspects of most significance, our key stakeholders did not highlight the GRI 3.1 environmental performance indicators.
EN20	NO <sub>x</sub> , SO <sub>x</sub> and other significant air emissions by type and weight.	Not	–	Northern Trust continues to assess our global operations to identify opportunities to operate efficiently and quantify our environmental impact.  The assessment includes engaging key stakeholders through various methods. During our 2013 assessment of non-financial aspects of most significance, our key stakeholders did not highlight the GRI 3.1 environmental performance indicators.
EN21	Total water discharge by quality and destination.	Not	–	Northern Trust continues to assess our global operations to identify opportunities to operate efficiently and quantify our environmental impact.  The assessment includes engaging key stakeholders through various methods. During our 2013 assessment of non-financial aspects of most significance, our key stakeholders did not highlight the GRI 3.1 environmental performance indicators.

## STANDARD DISCLOSURES PART III: PERFORMANCE INDICATORS (CONTINUED)

### Environmental

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
EN22	Total weight of waste by type and disposal method.	Not	–	Northern Trust continues to assess our global operations to identify opportunities to operate efficiently and quantify our environmental impact.  The assessment includes engaging key stakeholders through various methods. During our 2013 assessment of non-financial aspects of most significance, our key stakeholders did not highlight the GRI 3.1 environmental performance indicators.
EN23	Total number and volume of significant spills.	Fully	Northern Trust was not a party to any spills in 2013.	–
EN24	Weight of transported, imported, exported or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III and VIII, and percentage of transported waste shipped internationally.	Not	–	Not applicable
EN25	Identity, size, protected status and biodiversity value of water bodies and related habitats significantly affected by the reporting organization's discharges of water and runoff.	Not	–	Not applicable
<b>Products and services</b>				
EN26	Initiatives to mitigate environmental impacts of products and services and extent of impact mitigation.	Fully	See Northern Trust CDP submission at <a href="https://www.northerntrust.com/documents/reports/2013-cdp-submission.pdf">https://www.northerntrust.com/documents/reports/2013-cdp-submission.pdf</a>	–
EN27	Percentage of products sold and their packaging materials that are reclaimed by category.	Not	–	We do not report this disclosure item as the information is not applicable to our business because we are a financial services firm and do not package products.
<b>Compliance</b>				
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	Fully	Northern Trust's policy is to comply with all applicable laws and regulations in all countries where we operate.  Northern Trust Corporation is a public company and is required to file periodic reports with the Securities and Exchange commission (SEC), including reports on Forms 10-Q and 10-K.  The filings can be found here: <a href="https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings">https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings</a>	–



## STANDARD DISCLOSURES PART III: PERFORMANCE INDICATORS (CONTINUED)

### Environmental

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
<b>Transport</b>				
EN29	Significant environmental impacts of transporting products and other goods and materials used for the organization's operations, and transporting members of the workforce.	Not	–	<p>Northern Trust continues to assess our global operations to identify opportunities to operate efficiently and quantify our environmental impact.</p> <p>The assessment includes engaging key stakeholders through various methods. During our 2013 assessment of non-financial aspects of most significance, our key stakeholders did not highlight the GRI 3.1 environmental performance indicators.</p>
<b>Overall</b>				
EN30	Total environmental protection expenditures and investments by type.	Not	–	<p>Northern Trust continues to assess our global operations to identify opportunities to operate efficiently and quantify our environmental impact.</p> <p>The assessment includes engaging key stakeholders through various methods. During our 2013 assessment of non-financial aspects of most significance, our key stakeholders did not highlight the GRI 3.1 environmental performance indicators.</p>

## STANDARD DISCLOSURES PART III: PERFORMANCE INDICATORS (CONTINUED)

### Social: Labor Practices and Decent Work

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
<b>Employment</b>				
LA1	Total workforce by employment type, employment contract and region, broken down by gender.	Fully	31	–
LA2	Total number and rate of new employee hires and employee turnover by age group, gender and region.	Not	–	Not available – current limitations do not allow this information to be reported upon.
LA3	Benefits provided to full-time employees that are not provided to temporary or part-time employees by major operations.	Fully	32–33	–
LA15	Return to work and retention rates after parental leave by gender.	Fully	32	–
<b>Labor/management relations</b>				
LA4	Percentage of employees covered by collective bargaining agreements.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
LA5	Minimum notice period(s) regarding significant operational changes, including whether it is specified in collective agreements.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
<b>Occupational health and safety</b>				
LA6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs.	Fully	33–34	–
LA7	Rates of injury, occupational diseases, lost days and absenteeism, and number of work-related fatalities by region and by gender.	Not	–	We do not report this disclosure item as the information is not applicable to our business because lost days, rates of injury, occupational diseases and work-related fatalities are not concepts normally associated with the financial services industry.
LA8	Education, training, counseling, prevention and risk-control programs in place to assist workforce members, their families or community members regarding serious diseases.	Fully	33–34	–
LA9	Health and safety topics covered in formal agreements with trade unions.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.

## STANDARD DISCLOSURES PART III: PERFORMANCE INDICATORS (CONTINUED)

### Social: Labor Practices and Decent Work

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
<b>Training and education</b>				
LA10	Average hours of training per year per employee by gender and by employee category.	Partially	Northern Trust managers received, on average, 4.6 hours of training in 2013.	Average number of training per year per gender is not included. Current systems do not allow for this information to be reported upon.
LA11	Programs for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
LA12	Percentage of employees receiving regular performance and career development reviews by gender.	Fully	In 2013, 96% of Northern Trust employees received performance reviews.	–
<b>Diversity and equal opportunity</b>				
LA13	Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership and other indicators of diversity.	Fully	15, 31	–
<b>Equal remuneration for women and men</b>				
LA14	Ratio of basic salary and remuneration of women to men by employee category by significant locations of operation.	Not	–	We do not report this disclosure item as the information is proprietary.

## STANDARD DISCLOSURES PART III: PERFORMANCE INDICATORS (CONTINUED)

### Social: Human Rights

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
<b>Investment and procurement practices</b>				
HR1	Percentage and total number of significant investment agreements and contracts that include clauses incorporating human rights concerns or that have undergone human rights screening.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
HR2	Percentage of significant suppliers, contractors and other business partners that have undergone human rights screening and actions taken.	Partially	21	Data not currently available.
HR3	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained.	Not	–	We do not report this disclosure item as the information is proprietary.
<b>Non-discrimination</b>				
HR4	Total number of incidents of discrimination and corrective actions taken.	Fully	Northern Trust's policy is to comply with all applicable laws and regulations in all countries where we operate.  Northern Trust Corporation is a public company and is required to file periodic reports with the Securities and Exchange commission (SEC), including reports on Forms 10-Q and 10-K.  The filings can be found here: <a href="https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings">https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings</a>	–
<b>Freedom of association and collective bargaining</b>				
HR5	Operations and significant suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and actions taken to support these rights.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
<b>Child labor</b>				
HR6	Operations and significant suppliers identified as having significant risk for incidents of child labor and measures taken to contribute to the effective abolition of child labor.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
<b>Prevention of forced and compulsory labor</b>				
HR7	Operations and significant suppliers identified as having significant risk for incidents of forced or compulsory labor and measures to contribute to the elimination of all forms of forced or compulsory labor.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.

## STANDARD DISCLOSURES PART III: PERFORMANCE INDICATORS (CONTINUED)

### Social: Human Rights

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
<b>Security practices</b>				
HR8	Percentage of security personnel trained in the organization's policies or procedures concerning aspects of human rights that are relevant to operations.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
<b>Indigenous rights</b>				
HR9	Total number of incidents of violations involving rights of indigenous people and actions taken.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
<b>Assessment</b>				
HR10	Percentage and total number of operations that have been subject to human rights reviews and/or impact assessments.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
<b>Remediation</b>				
HR11	Number of grievances related to human rights filed, addressed and resolved through formal grievance mechanisms.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.

## STANDARD DISCLOSURES PART III: PERFORMANCE INDICATORS (CONTINUED)

### Social: Society

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
<b>Local communities</b>				
SO1 (FSSS)	Nature, scope and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating and exiting.	Partially	27 The communities covered by the Northern Trust Charitable Trust are regularly assessed.	Data not currently available.
SO1 (G3.1)	Percentage of operations with implemented local community engagement, impact assessments and development programs.	Partially	27 The communities covered by the Northern Trust Charitable Trust are regularly assessed.	Data not currently available.
FS13	Access points in low-populated or economically disadvantaged areas by type.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
FS14	Initiatives to improve access to financial services for disadvantaged people.	Fully	26–29	–
SO9	Operations with significant potential or actual negative impacts on local communities.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
SO10	Prevention and mitigation measures implemented in operations with significant potential or actual negative impacts on local communities.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
<b>Corruption</b>				
SO2	Percentage and total number of business units analyzed for risks related to corruption.	Fully	18	–
SO3	Percentage of employees trained in organization's anti-corruption policies and procedures.	Fully	18	–
SO4	Actions taken in response to incidents of corruption.	Fully	Northern Trust's policy is to comply with all applicable laws and regulations in all countries where we operate.  Northern Trust Corporation is a public company and is required to file periodic reports with the Securities and Exchange commission (SEC), including reports on Forms 10-Q and 10-K.  The filings can be found here: <a href="https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings">https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings</a>	–

## STANDARD DISCLOSURES PART III: PERFORMANCE INDICATORS (CONTINUED)

### Social: Society

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
<b>Public policy</b>				
SO5	Public policy positions and participation in public policy development and lobbying.	Fully	<a href="http://www.northerntrust.com/about-us/investor-relations/corporate-governance/government-relations-political-contributions">http://www.northerntrust.com/about-us/investor-relations/corporate-governance/government-relations-political-contributions</a>	–
SO6	Total value of financial and in-kind contributions to political parties, politicians and related institutions by country.	Fully	<a href="http://query.nictusa.com/cgi-bin/com_detail/C00024935/">http://query.nictusa.com/cgi-bin/com_detail/C00024935/</a> <a href="http://query.nictusa.com/cgi-bin/com_detail/C00515148/">http://query.nictusa.com/cgi-bin/com_detail/C00515148/</a>	–
<b>Anti-competitive behavior</b>				
SO7	Total number of legal actions for anti-competitive behavior, anti-trust and monopoly practices and their outcomes.	Fully	Northern Trust's policy is to comply with all applicable laws and regulations in all countries where we operate.  Northern Trust Corporation is a public company and is required to file periodic reports with the Securities and Exchange commission (SEC), including reports on Forms 10-Q and 10-K.  The filings can be found here: <a href="https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings">https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings</a>	–
<b>Compliance</b>				
SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations.	Fully	Northern Trust's policy is to comply with all applicable laws and regulations in all countries where we operate.  Northern Trust Corporation is a public company and is required to file periodic reports with the Securities and Exchange commission (SEC), including reports on Forms 10-Q and 10-K.  The filings can be found here: <a href="https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings">https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings</a>	–

## STANDARD DISCLOSURES PART III: PERFORMANCE INDICATORS (CONTINUED)

### Social: Product Responsibility

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
<b>Customer health and safety</b>				
PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement and percentage of significant products and services categories subject to such procedures.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
PR2	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
<b>Product and service labelling</b>				
PR3	Type of product and service information required by procedures and percentage of significant products and services subject to such information requirements.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labeling by type of outcomes.	Fully	Northern Trust's policy is to comply with all applicable laws and regulations in all countries where we operate.  Northern Trust Corporation is a public company and is required to file periodic reports with the Securities and Exchange commission (SEC), including reports on Forms 10-Q and 10-K.  The filings can be found here: <a href="https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings">https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings</a>	–
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.	Partially	Delivering superior client service is our hallmark and the ultimate determinant of our long-term success. We use a variety of direct and indirect avenues to gain feedback on client satisfaction. Our executive management and client service teams hold meetings with our clients regularly throughout the year to review the health of our overall relationships. Additionally, we engage independent market research firms to survey our clients worldwide to get feedback from them on an annual and biennial basis.	–
FS16	Initiatives to enhance financial literacy by type of beneficiary.	Not	–	During our most recent engagement with key stakeholders, this aspect was not identified as a non-financial aspect of most significance.



## STANDARD DISCLOSURES PART III: PERFORMANCE INDICATORS (CONTINUED)

### Social: Product Responsibility

Profile disclosure	Disclosure	Level of reporting	Location of disclosure	Omission
<b>Marketing communications</b>				
PR6	Programs for adherence to laws, standards and voluntary codes related to marketing communications, including advertising, promotion and sponsorship.	Fully	Our marketing policies are reviewed periodically by legal and compliance and prior to production/design.	–
PR7	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion and sponsorship by type of outcomes.	Fully	Northern Trust's policy is to comply with all applicable laws and regulations in all countries where we operate.  Northern Trust Corporation is a public company and is required to file periodic reports with the Securities and Exchange commission (SEC), including reports on Forms 10-Q and 10-K.  The filings can be found here: <a href="https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings">https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings</a>	–
<b>Customer privacy</b>				
PR8	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.	Fully	Northern Trust's policy is to comply with all applicable laws and regulations in all countries where we operate.  Northern Trust Corporation is a public company and is required to file periodic reports with the Securities and Exchange commission (SEC), including reports on Forms 10-Q and 10-K.  The filings can be found here: <a href="https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings">https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings</a>	–
<b>Compliance</b>				
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.	Fully	Northern Trust's policy is to comply with all applicable laws and regulations in all countries where we operate.  Northern Trust Corporation is a public company and is required to file periodic reports with the Securities and Exchange commission (SEC), including reports on Forms 10-Q and 10-K.  The filings can be found here: <a href="https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings">https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings</a>	–



## Statement GRI Application Level Check

GRI hereby states that **Northern Trust** has presented its report "2013 Northern Trust Corporate Social Responsibility Report" to GRI's Report Services which have concluded that the report fulfills the requirement of Application Level A+.

GRI Application Levels communicate the extent to which the content of the G3.1 Guidelines has been used in the submitted sustainability reporting. The Check confirms that the required set and number of disclosures for that Application Level have been addressed in the reporting and that the GRI Content Index demonstrates a valid representation of the required disclosures, as described in the GRI G3.1 Guidelines. For methodology, see [www.globalreporting.org/SiteCollectionDocuments/ALC-Methodology.pdf](http://www.globalreporting.org/SiteCollectionDocuments/ALC-Methodology.pdf)

Application Levels do not provide an opinion on the sustainability performance of the reporter nor the quality of the information in the report.

Amsterdam, 27 August 2014

A handwritten signature in black ink, appearing to read "Ásthildur Hjaltadóttir".

Ásthildur Hjaltadóttir  
Director Services  
Global Reporting Initiative



The "+" has been added to this Application Level because Northern Trust has submitted (part of) this report for external assurance. GRI accepts the reporter's own criteria for choosing the relevant assurance provider.

*The Global Reporting Initiative (GRI) is a network-based organization that has pioneered the development of the world's most widely used sustainability reporting framework and is committed to its continuous improvement and application worldwide. The GRI Guidelines set out the principles and indicators that organizations can use to measure and report their economic, environmental, and social performance. [www.globalreporting.org](http://www.globalreporting.org)*

*Disclaimer: Where the relevant sustainability reporting includes external links, including to audio visual material, this statement only concerns material submitted to GRI at the time of the Check on 18 August 2014. GRI explicitly excludes the statement being applied to any later changes to such material.*

NORTHERNTRUST.COM

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**Northern Trust**

Q56342 (9/14)