

Northern Trust

Global Reporting Initiative Index / Sustainability Accounting Standards Board Index 2024

Global Reporting Initiative Index 2024

This report has been prepared in accordance with the Global Reporting Initiative's Universal and Topic standards according to Northern Trust's material topics identified in our most recent double materiality assessment.

GRI Standard	Disclosure		2024 Response				
General	2-1	Organizational details	2024 Annual Report on Form 10-K, PDF pgs 1-3, 38				
General	2-2	Entities included in the organization’s sustainability reporting	2024 Annual Report Form on 10-K, PDF pg 1				
General	2-3	Reporting period, frequency and contact point	2024 Sustainability Report, About This Report, pg 2				
General	2-4	Restatements of information	2024 Sustainability Report, About This Report, pg 2				
General	2-5	External assurance	We do not currently seek external assurance on our overall sustainability report. We receive limited assurance from KPMG on our greenhouse gas emissions calculations and methodology.				
General	2-6	Activities, value chain and other business relationships	2024 Annual Report on Form 10-K, Business Overview PDF pgs 6-7; Geographic Area PDF pg 69; Financial Overview PDF pgs 43; Senior Notes and Long Term Debt PDF pgs 136-137; Stockholder's Equity PDF pgs 137-138				
General	2-7	Employees	Employees by employment types – by gender, as of December 31, 2024				
			Number of		Female	Male	Total
			Employees		10,644	13,169	23,813
			Permanent employees		10,619	13,137	23,756
			Temporary employees		25	32	57
			Full-time employees		10,351	13,114	23,465
			Part-time employees		293	55	348
General	2-7	Employees	Employees by employment types – by region, as of December 31, 2024				
			Number of	APAC	EMEA	N. America	Total
			Employees	9,844	4,123	9,846	23,813
			Permanent employees	9,836	4,074	9,846	23,756
			Temporary employees	8	49	0	57
			Full-time employees	9,838	3,841	9,786	23,465
			Part-time employees	6	282	60	348
		<ul style="list-style-type: none">• There are no significant variations in the number of employees during the year.• These figures have been calculated by headcount.• See pg 2 of the 2024 Sustainability Report period, scope and boundary for further details.					
General	2-8	Workers who are not employees	The large majority of Northern Trust workers are full-time, permanent employees in professional or administrative desk-based roles.				
General	2-9	Governance structure and composition	2025 Proxy Statement, PDF pgs 8-11, 22-23, 28-29				
General	2-10	Nomination and selection of the highest governance body	2025 Proxy Statement, PDF pgs 29-30				
General	2-11	Chair of the highest governance body	2025 Proxy Statement, PDF pgs 12				
General	2-12	Role of the highest governance body in overseeing the management of impacts	2025 Proxy Statement, PDF pgs 17-19, 32-34				

GRI Standard	Disclosure		2024 Response
General	2-13	Delegation of responsibility for managing impacts	2025 Proxy Statement, PDF pgs 32-34
General	2-14	Role of the highest governance body in sustainability reporting	2024 Sustainability Report, Sustainability Governance and Oversight, pg 14
General	2-15	Conflicts of interest	2025 Proxy Statement, PDF pgs 8, 24-25
General	2-16	Communication of critical concerns	2025 Proxy Statement, PDF pgs 34
General	2-17	Collective knowledge of the highest governance body	2025 Proxy Statement, PDF pgs 9-16
General	2-18	Evaluation of the performance of the highest governance body	2025 Proxy Statement, PDF pg 27
General	2-19	Remuneration policies	2025 Proxy Statement, PDF pgs 37, 45-48
General	2-20	Process to determine remuneration	2025 Proxy Statement, PDF pgs 46-48
General	2-21	Annual total compensation ratio	2025 Proxy Statement, PDF pg 68
General	2-22	Statement on sustainable development strategy	2024 Sustainability Report, Message from Our Chairman and CEO and Our Head of Corporate Sustainability, Inclusion and Social Impact, pg 3
General	2-23	Policy commitments	2024 Sustainability Report, Policies and Practices That Shape Our Culture, Conduct and Continuous Learning, pg 17
General	2-24	Embedding policy commitments	2024 Sustainability Report, Policies and Practices That Shape Our Culture, Conduct and Continuous Learning, pg 17
General	2-25	Processes to remediate negative impacts	2024 Sustainability Report, Integrated Approach, pg 13, Stakeholders: Earning Trust Through Active Communication, pg 16
General	2-26	Mechanisms for seeking advice and raising concerns	Code of Business Conduct and Ethics
General	2-27	Compliance with laws and regulations	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 SEC, which would include information of this nature to the extent material.
General	2-28	Membership associations	2024 Sustainability Report, Selected Memberships, pg 45
General	2-29	Approach to stakeholder engagement	2024 Sustainability Report, Stakeholders: Earning Trust Through Regular Communication, pg 16; 2025 Proxy Statement, PDF pgs 30-31
General	2-30	Collective bargaining agreements	0.8% of total employees are covered by collective bargaining agreements.
General	3-1	Process to determine material topics	2024 Sustainability Report, Material Topics Integrated Into Our Strategy, pg 15
General	3-2	List of material topics	2024 Sustainability Report, Material Topics Integrated Into Our Strategy, pg 15
General	3-3	Management of material topics	2024 Annual Report on Form 10-K, PDF pgs 20-29; 2024 Sustainability Report, Material Topics Integrated Into Our Strategy, pg 15
GRI 201: Economic Performance 2016			
Management	201-2	Financial implications and other risks and opportunities due to climate change	2024 Annual Report on Form 10-K, PDF pgs 91-93; 2024 Sustainability Report, Managing the Environmental Risks and Impacts on Our Operations, pgs 19-21
GRI 203: Indirect Economic Impacts 2016			
General	3-3	Management of material topics	2024 Sustainability Report, Championing Social Impact, pgs 30-32
Management	203-1	Infrastructure investments and services supported	2024 Philanthropic Impact Report; 2024 Sustainability Report, Championing Social Impact, pgs 30-32
Management	203-2	Significant indirect economic impacts	2024 Philanthropic Impact Report

GRI Standard	Disclosure		2024 Response
GRI 205: Anti-corruption 2016			
General	3-3	Management of material topics	2024 Sustainability Report, Our Approach to Ethics and Conduct, pg 39
Management	205-1	Operations assessed for risks related to corruption	<p>Facilitation Payments, Contractors and Suppliers, Charitable Contributions, Gifts, Hospitality and Expenses, Agents and Other Intermediaries, Product Risk (Mergers and Acquisition, Project Finance, Private Equity, High-Value Projects, etc.), Sponsorships, Books and Records. Political Contributions, Business Risk (Extraterritorial activities in some geographical locations that are more prone to bribery and corruption), Recruitment/Internships, Client Risk (Client industries, activities, and geographies of operation), and Transaction Risk (Heightened due diligence required for certain transaction types).</p> <p>Compliance risk assessments of all key areas are made annually to determine the correct method for prevention and detection.</p>
Management	205-2	Communication and training about anti-corruption policies and procedures	<p>The Global Anti-Bribery and Corruption Policy is reviewed by the Global Compliance Committee and the Compliance and Ethics Oversight Committee at least annually.</p> <ul style="list-style-type: none">• All of Northern Trust’s governance body members have access to a copy of Northern Trust’s Global Anti-Bribery and Corruption Policy or the Code of Ethics which covers the key principles of the Policy.• All of Northern Trust’s employees have the Global Anti-Bribery and Corruption Policy communicated to them on an annual basis.• The existence of Northern Trust’s Global Anti-Bribery and Corruption Policy is communicated to any clients/business partners who request it.• All of Northern Trust’s governance body members received periodic mandatory training on anti-bribery and corruption.• All of Northern Trust’s employees received mandatory training on anti-bribery and corruption.
GRI 207: Tax 2019			
Management	207-2	Tax governance, control and risk management	2024 Global Tax Strategy
GRI 302: Energy 2016			
General	3-3	Management of material topics	2024 Sustainability Report, Managing the Environmental Risks and Impacts of our Operations, pgs 19-22
Environmental	302-1	Energy consumption within the organization	<p>Total Energy Consumption: 87,805,526 kWh</p> <ul style="list-style-type: none">• Electricity consumption: 78,713,996 kWh is electricity, and 12,999,935 kWh is from renewable energy.• Heating consumption: 7,517,785 kWh is electricity, and 1,573,745 kWh is from diesel.• Cooling consumption: 15,688 ton-h as we only receive cooling data from 1 site which utilizes renewable energy. <p>Consumption from 87% of square footage is based on raw data. When raw data is unavailable, Northern Trust estimates energy consumption based on the Real Estate Environmental Benchmark (REEB 2023) and Energy Star benchmark.</p>
Environmental	302-3	Energy intensity	<p>Energy intensity ratio = 3,267 kWh/full-time employee using 23,896 full-time employees from headcount</p> <p>Intensity ratio includes fuel (gas and diesel) and electricity (including 16.5% renewable energy) only within the organization.</p>
Environmental	302-4	Reduction of energy consumption	<p>In 2024, Northern Trust saved 143,390 kWh through efficiency projects. Those reductions include both fuel (gas and diesel) and electricity and have been based on pre- and post-energy efficiency projects. The base year used is 2019 in alignment with Northern Trust greenhouse gas emissions reporting.</p>

GRI Standard	Disclosure		2024 Response
GRI 305: Emissions 2016			
General	3-3	Management of material topics	2024 Sustainability Report, Managing the Environmental Risks and Impacts of our Operations, pgs 19-22
Environmental	305-1	Direct (Scope 1) emissions	2024 Statement of Greenhouse Gas Emissions
Environmental	305-2	Energy indirect (Scope 2) emissions	2024 Statement of Greenhouse Gas Emissions
Environmental	305-3	Other indirect (Scope 3) emissions	2024 Statement of Greenhouse Gas Emissions
Environmental	305-4	GHG emissions intensity	2024 Statement of Greenhouse Gas Emissions
Environmental	305-5	Reduction of GHG emissions	2024 Statement of Greenhouse Gas Emissions
GRI 306: Effluents and Waste 2016			
Environmental	306-1	Waste generation and significant waste-related impacts	<p>Northern Trust began gathering data on waste production in our buildings in 2020. In 2024, 614 tCO2e were associated with waste equating to 1,263,588 kg of waste, giving an average of 13kg of waste per partner. Of this 1.2 million kg of waste – 28% was recycled, and 72% was general waste.</p> <p>For general waste, landfill is assumed. For 3 sites, local facility management noted that the general waste is sent to an incineration plant rather than land filled, so this is accounted for in reporting. 230kg of food waste was generated by 1 site.</p> <p>At Northern Trust, 30 sites report actual waste data, and 26 sites report actual recycling data. We continue to make efforts across the entire portfolio to reduce our single-use plastic. At the close of 2024, 42% of sites were more than 60% plastic free.</p>
Environmental	306-2	Management of significant waste-related impacts	2024 Sustainability Report, Managing the Environmental Risks and Impacts of our Operations, pg 21
Environmental	306-3	Waste generated	<ul style="list-style-type: none">• 1,264 metric tons of general waste (Worst case scenario assumed for carbon reporting - land filled)• 502 tons of recycling (encompasses paper, general mixed dry recycling)• 0.229 metric tons of food waste (from 1 site reporting)• 30% of buildings provide waste data, and 26% of buildings provide recycling data.

GRI Standard	Disclosure		2024 Response															
GRI 403: Occupational Health and Safety 2018																		
General	3-3	Management of material topics	2024 Sustainability Report, Our People Strategy, pg 24															
Social	403-1	Workers representation in formal joint management - worker health and safety committees	In those locations where health and safety committees exist, there is representation from Northern Trust employees and senior management. Australia, Canada, Luxembourg, and the Philippines, which represents 8.9% of full-time employees, are currently the only locations with health and safety committees.															
Social	403-5	Worker training on occupational health and safety	<p>EMEA staff are required to undertake a health and safety induction at the start of their employment, employees and contractors.</p> <p>The induction includes:</p> <ul style="list-style-type: none">• Emergency fire evacuation procedures• Shelter in place procedures• How to report accident, near misses and hazards• How to request first aid assistance• A multiple choice quiz at the end of the induction confirms the staff member's understanding of the induction.• Health and Safety inductions and managed through Northern Trust University <p>As part of the EMEA Display Screen Equipment (DSE) management program staff, employees and contractors, are required to undertake DSE set up training for both in office and home workstations, and to complete a test to confirm their competency to complete a DSE self assessment.</p> <p>Staff, permanent and contractors, are also required to undertake general fire safety awareness training.Globally volunteer staff members are trained as first aiders, AED users, fire wardens and evacuation chair operators.The training is delivered in person and by qualified trainers, with the trainees competency being monitored throughout the training session(s). The frequency of the training is governed by legislation and best practice.</p> <p>Specific members of the facilities team receive Legionella and Asbestos awareness training. This training is provided by external specialist trainers and is delivered virtually and face to face.</p> <p>All training is provided free of charge to the member of staff and takes place during working hours.</p> <p>Globally staff have access to an Employee Assistance Programme, well-being initiatives, mental health first aiders, private medical care and health assessments, all of which are managed through our HR and Benefits teams.</p>															
Social	403-6	Promotion of worker health	While the exact composition of the employee benefit package varies by country, our benefit programs are designed to be locally competitive, to meet the needs of our employees and their families, and to reflect the cultural values of the organization. Typical benefit programs include retirement, health care, paid time off, income protection such as disability and life insurance, leaves of absence, and access to our Employee Assistance Program. These programs are underpinned by global pillars which focus on our employees’ physical, social, emotional and financial well-being.															
GRI 404: Training and Education 2016																		
General	3-3	Management of material topics	2024 Sustainability Report, Our People Strategy, pg 24															
Social	404-1	Average hours of training per year per employee	<table><tr><th></th><th>Female</th><th>Male</th><th>Manager</th><th>Non-Manager</th></tr><tr><td></td><td>19.68</td><td>18.75</td><td>19.19</td><td>19.16</td></tr></table>		Female	Male	Manager	Non-Manager		19.68	18.75	19.19	19.16					
	Female	Male	Manager	Non-Manager														
	19.68	18.75	19.19	19.16														
Social	404-2	Programs for upgrading employee skills and transition assistance programs	2024 Sustainability Report, Our People Strategy, pg 24															
Social	404-3	Percentage of employees receiving regular performance and career development reviews	<table><tr><th>Of total population:</th><th colspan="2">Of those required by gender:</th><th colspan="2">Of those required by employee category:</th></tr><tr><th></th><th>Female</th><th>Male</th><th>Manager</th><th>Non-Manager</th></tr><tr><td>99 %</td><td>45 %</td><td>55 %</td><td>21 %</td><td>79 %</td></tr></table>	Of total population:	Of those required by gender:		Of those required by employee category:			Female	Male	Manager	Non-Manager	99 %	45 %	55 %	21 %	79 %
Of total population:	Of those required by gender:		Of those required by employee category:															
	Female	Male	Manager	Non-Manager														
99 %	45 %	55 %	21 %	79 %														

GRI Standard	Disclosure	2024 Response
GRI 405: Diversity and Equal Opportunity 2016		
General	3-3 Management of material topics	2024 Sustainability Report, Commitment to Our Employees, pgs 25-28
Social	405-1 Diversity of governance bodies	Board of Directors as of December 31, 2024
		Female 33 %
		Male 67 %
		Under 30 — %
		30-49 — %
		50 years or older 100 %
		Asian 17 %
		Black 25 %
		Hispanic — %
		White 58 %
		Executive Officers as of December 31, 2024
		Female 33 %
		Male 67 %
		Under 30 — %
		30-49 7 %
		50 years or older 93 %
		Black 7 %
		Hispanic 7 %
		White 86 %
		Total Employees as of December 31, 2024*
		Female 45 %
		Male 55 %
		Under 30 15 %
		30-49 50 %
		50 years or older 35 %
		Asian 15 %
		Black 10 %
		Hispanic 13 %
		White 59 %
		Other/Two or more 2%
		Not disclosed 1%
		*U.S. only
Social	405-2 Ratio of basic salary and remuneration	2024 UK Gender Pay Gap Statement ; 2024 Ireland Gender Pay Gap Statement

GRI Standard	Disclosure		2024 Response
GRI 413: Local Communities 2016			
General	3-3	Management of material topics	2024 Sustainability Report, Championing Social Impact, pgs 30-32
Social	413-1	Operations with local community engagement, impact assessments and development programs	2024 Philanthropic Impact Report
GRI 414: Supplier Social Assessment 2016			
General	3-3	Management of material topics	2024 Sustainability Report, Human Rights and Tackling Modern Slavery, pgs 34-35, Engaging Suppliers, pgs 36-37
Social	414-1	New suppliers that were screened using social criteria	<p>All suppliers to Northern Trust shall monitor their activities to ensure their compliance with this Code of Conduct and applicable legal requirements. If a supplier identifies areas of non-compliance, the supplier agrees to notify Northern Trust Global Procurement and outline its plans to remedy any such non-compliance. Without limiting the foregoing, if a supplier becomes aware of any acts of slavery or human trafficking by itself or by any of its subcontractors or suppliers, it shall promptly notify Northern Trust in writing and reasonably cooperate in any subsequent Northern Trust investigations.</p> <p>For more information, please refer to the Supplier Code of Conduct.</p>
GRI 415: Public Policy 2016			
General	3-3	Management of material topics	2024 Sustainability Report, Political Engagement and Public Policy, pg 40
Social	415-1	Political contributions	2024 Year-End Contribution Report
GRI 418: Customer Privacy 2016			
General	3-3	Management of material topics	2024 Sustainability Report, Cybersecurity, pgs 41-43, Data Privacy, pg 44
Social	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Northern Trust’s policy is to comply with all applicable laws and regulations in the 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”), which would include information of this nature to the extent it is material.

Sustainability Accounting Standards Board Index 2024

This report has been prepared in furtherance of our ongoing commitment to transparency for our various stakeholder groups. This report has been prepared in accordance with the Sustainability Accounting Standards Board's disclosures for Asset Management and Custody Activities. As such, the information provided in this response is primarily representative of Northern Trust's Asset Management (NTAM) business. Additional information may exist or responses may vary, with respect to Northern Trust's other business units. Further, In 2024, we engaged an external agency to conduct a comprehensive gap analysis against the IFRS S1 and S2 reporting frameworks, aiming to gauge our current readiness against the frameworks. This proactive assessment will inform Northern Trust's future plans to report in accordance with these standards.

Accounting Metric	Category	Code	2024 Response
Topic: Transparent Information & Fair Advice for Customers			
(1) Number and (2) percentage of licensed employees and identified decision-makers with a record of investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings	Quantitative	FN-AC-270a.1	During the reporting period of 2024, no Northern Trust licensed employees or identified decision-makers (0%) were the subject of new investigations, complaints or proceedings of this type.
Total amount of monetary losses as a result of legal proceedings associated with marketing and communication of financial product-related information to new and returning customers	Quantitative	FN-AC-270a.2	Please refer to Northern Trust's periodic reports under Section 13 or Section 15(d) of the Securities Exchange Act of 1934, as amended, and other filings made with the U.S. Securities and Exchange Commission for a description of material legal proceedings, if any.

Accounting Metric	Category	Code	2024 Response
Description of approach to informing customers about products and services	Discussion and Analysis	FN-AC-270a.3	<p>Northern Trust Asset Management (NTAM) is a leading* global investment manager. We are purposeful investors, committed to constructing innovative and efficient strategies that appropriately compensate investors for risk and aim to deliver better outcomes in all market environments. We purposefully combine robust capital markets research, expert portfolio construction and comprehensive risk management to craft efficient solutions that seek to deliver targeted investment outcomes. Our fiduciary heritage helps guide our principle-based culture and collaborative approach, resulting in a distinctive client experience.</p> <p>Here are the key aspects of NTAM's operations and client commitment:</p> <ul style="list-style-type: none"> • Investment Approach: NTAM utilizes a forward-looking, historically aware investment approach, combining robust capital markets research, expert portfolio construction, and comprehensive risk management to create solutions designed for targeted investment outcomes. • Compliance and Transparency: <ul style="list-style-type: none"> – A dedicated Compliance team operates independently to ensure adherence to regulations and prevent conflicts of interest. – Information about NTAM's products and services is transparently communicated through Form ADV filings (for SEC registered entities), which provide details on advisory services, strategies, fees, conflicts of interest, and risks. – Prospectuses or offering documents are available for registered and private funds, and Declarations of Trust for bank-registered funds. • Conflicts of Interest and Ethics: NTAM has established policies and procedures to manage and disclose potential conflicts of interest, with the core principle of placing client interests first. Our Code of Ethics provides a framework for employee conduct, emphasizing fiduciary duties, preventing misuse of position, maintaining client confidentiality, ensuring investment decision-making independence, preserving the firm's reputation, and encouraging a long-term investment philosophy for personal securities. • Performance Reporting: NTAM adheres to the CFA Institute's Global Investment Performance Standards for consistent and transparent communication of investment performance results. • Client Communication: <ul style="list-style-type: none"> – Client-facing teams are trained to uphold high standards for client and prospect communication, utilizing a wide range of mediums such as factsheets, websites, blogs, webinars, conferences, and audited annual reports for funds. – Clients receive periodic statements detailing performance, portfolio characteristics, and risk statistics. – Marketing materials and presentations are subject to internal review and compliance. – NTAM's communication strategy is tailored to client type and jurisdictional requirements, with additional information available on their website. <p>* "Special Report on the Largest Money Managers," P&I 6/10/2024. Ranking based on total worldwide AUM of \$1.1T as of 12/31/2023.</p>
Topic: Employee Diversity & Inclusion			
Percentage of gender and racial/ethnic group representation for (1) executive management, (2) non-executive management, (3) professionals, and (4) all other employees	Quantitative	FN-AC-330a.1	See below chart of Northern Trust's EEO-1 report on page 12.

Accounting Metric	Category	Code	2024 Response		
Topic: Incorporation of Environmental, Social, and Governance Factors in Investment Management & Advisory					
Amount of assets under management, by asset class, that employ (1) integration of environmental, social, and governance (ESG) issues, (2) sustainability themed investing, and (3) screening	Quantitative	FN-AC-410a.1	We have been managing portfolios incorporating sustainability considerations for over 30 years with our first client mandates utilizing negative screening, historically referred to as Socially Responsible.Northern Trust Asset Management’s (NTAM) Sustainable Investing (SI) Platform provides a variety of capabilities and solutions created and managed for our clients that seek to integrate SI objectives into the investment processes. The SI Platform encompasses NTAM’s investment strategies and accounts that utilize values-based and norms-based screens, best-in-class and environmental, social and governance (ESG) integration, or thematic investing that may focus on a specific sustainability issue such as climate risk. Our sustainable investing assets have grown over time reaching US\$189 billion in assets under management as of 12/31/2024. We have provided a breakdown by asset class below:		
			Public Equity:	\$	179,024,112,421
			Fixed Income:	\$	10,182,975,069
			We have provided a breakdown by approach in the table below:		
			Negative Screening	98.1 %	\$ 185,568,997,995
			Engagement	35.5 %	\$ 67,154,227,271
			Best In Class	7.0 %	\$ 13,239,327,512
			Thematic	11.5 %	\$ 21,792,978,038
			Tilting	12.2 %	\$ 23,015,452,320
			Integration	5.3 %	\$ 10,101,525,334
Climate	29.0 %	\$ 54,962,082,868			
Description of approach to incorporation of environmental, social, and governance (ESG) factors in investment and/or wealth management processes and strategies	Discussion and Analysis	FN-AC-410a.2	<p>NTAM purposefully combines robust capital markets research, expert portfolio construction and comprehensive risk management to craft efficient solutions to deliver targeted investment outcomes. Our roles and responsibilities as a fiduciary guide our principle-based culture and collaborative approach, resulting in a distinctive client experience. Our business strategy seeks to deliver investment solutions that solve the most complex needs of institutional and individual investors, with a focus on solutions that we believe align with our competitive advantage, provide the most value to investors and show potential for growth. Some of these solutions include sustainable investing, quantitative, multi-asset, cash and alternative strategies. We believe that, by serving as an active owner on behalf of our clients, we can help portfolio companies produce sustainable value as long as a company’s long-term financial returns are connected to their strategic, ESG performance.</p> <p>In 2019, we launched the Northern Trust ESG Vector Score™. The ESG Vector Score™ assesses a company in the context of financially relevant ESG-related criteria that could impact company performance. By leveraging two industry-leading frameworks, the ESG Vector Score™ provides investors a more transparent methodology that can assess companies with a consistent metric for both portfolio construction and stewardship.</p> <p>Our approach represents a refined perspective on ESG materiality and leverages our quantitative and fundamental research expertise. We believe our distinct ability to hone in on these critically important and financially material ESG issues will help further align sustainable investments and company engagements. And, as sustainable investing continues to mature and evolve, the ESG Vector Score’s™ open architecture means it can adapt to support multiple data sources and requirements over time. We see it as a foundational metric that can be used for years to come.</p>		
Description of proxy voting and investee engagement policies and procedures	Discussion and Analysis	FN-AC-410a.3	<ul style="list-style-type: none">• 2024 NTAM Stewardship Report• Global Proxy Voting Policies and Procedures• Global Proxy Voting Guidelines• Global Engagement Policy		

Accounting Metric	Category	Code	2024 Response
Topic: Financed Emissions			
Absolute gross financed emissions, disaggregated by (1) Scope 1, (2) Scope 2 and (3) Scope 3	Quantitative	FN-AC-410b.1	2024 NTAM TCFD Report, page 45, Exhibit 20
Total amount of assets under management (AUM) included in the financed emissions disclosure	Quantitative	FN-AC-410b.2	2024 NTAM TCFD Report, page 45
Percentage of total assets under management (AUM) included in the financed emissions calculation	Quantitative	FN-AC-410b.3	2024 NTAM TCFD Report, page 45
Description of the methodology used to calculate financed emissions	Discussion and Analysis	FN-AC-410b.4	2024 NTAM TCFD Report, Appendix 4
Topic: Business Ethics			
Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, of other related financial industry laws or regulations	Quantitative	FN-AC-510a.1	Northern Trust discloses material legal proceedings on Forms 10-K and 10-Q. During 2024, Northern Trust experienced no material losses in the categories listed above.
Description of whistle blower policies and procedures	Discussion and Analysis	FN-AC-510a.2	Northern Trust Standards of Conduct Policy requires employees to report known or suspected legal or conduct violations and provides several points of contact including Human Resources, the Chief Compliance and Ethics Officer, the Corporate Secretary, and the Equal Employment Opportunity Officer. Employees can also access a confidential hotline which is available 24 hours a day, 7 days a week. Regional hotline numbers are in the Standards of Conduct Policy as well as the corporate intranet page. Northern Trust does not tolerate any type of retaliation against employees who make a report. This includes discrimination in the terms and conditions of employment, or other adverse action of any kind solely as a result of making a report. Any employee who violates this non-retaliation policy will be subject to disciplinary action, up to and including termination. The hotline is managed by an independent third party. Northern Trust complies with applicable whistleblower regulations including the U.S. Sarbanes Oxley Act, and the U.S. Consumer Financial Protection Act. For more information, please refer to this link: https://www.northerntrust.com/united-states/about-us/corporate-social-responsibility/policy
(1)Total registered and (2) total unregistered assets under management(AUM)	Quantitative	FN-AC-000.A	\$1.6T Assets under Management as of December 31, 2024.
Total assets under custody and supervision	Quantitative	FN-AC-000.B	\$13.3T Assets under Custody as of December 31, 2024.

Global employees of as of December 31, 2024

	Female	Male
Executive Management	34%	66%
Non-Executive Management	40%	60%
Professionals	45%	55%
All Other Employees	51%	49%
Total	45%	55%

Reference for FN-AC 330a.1 | SECTION D – EMPLOYMENT DATA
US Employee Data for 2024

JOB CATEGORIES	Male							Female						
	White	Black or African American	Asian	Hispanic or Latino	Native Hawaiian or Other Pacific Islander	American Indian or Alaska Native	Two or More Races	White	Black or African American	Asian	Hispanic or Latino	Native Hawaiian or Other Pacific Islander	American Indian or Alaska Native	Two or More Races
Executive Management	53.5%	2.1%	5.8%	4.6%	—%	—%	1.5%	22.7%	2.5%	5.0%	2.1%	—%	—%	0.2%
Non-Executive Management	40.8%	2.8%	10.5%	3.5%	0.1%	0.1%	1.0%	25.8%	4.3%	5.1%	5.3%	—%	—%	0.7%
Professionals	33.3%	3.5%	9.1%	6.5%	0.2%	0.1%	1.2%	23.7%	6.8%	6.4%	8.1%	0.1%	—%	1.0%
All Other Employees	16.4%	4.5%	1.0%	7.6%	—%	—%	1.7%	30.6%	13.2%	3.8%	19.1%	—%	—%	2.1%
All Employees	35.3%	3.3%	8.9%	5.9%	0.2%	0.1%	1.2%	24.2%	6.3%	6.0%	7.6%	0.1%	—%	0.9%

This data is a snapshot employment data from the 12/16/2024-12/31/2024 pay period.