

**GENERAL INDICATORS**

| Indicator | Disclosure Description  | Report Section   | Report Page / External Document Link   | Disclosure |
|-----------|---|--|--|------------|
| G4-1      | Provide a description of key impacts, risks, and opportunities. | Letter from Chairman and CEO, Rick Waddell<br><br>Letter from Head of CSR and Global Diversity & Inclusion, Connie Lindsey         | Letter from Chairman and CEO, Rick Waddell and Head of CSR and Global Diversity & Inclusion, Connie Lindsey<br><br>P3.                       |            |
| G4-2      | Provide a description of key impacts, risks, and opportunities. | Letter from Chairman and CEO, Rick Waddell and Head of CSR and Global Diversity & Inclusion, Connie Lindsey<br><br>Basis of Report | Letter from Chairman and CEO, Rick Waddell and Head of CSR and Global Diversity & Inclusion, Connie Lindsey P3.<br><br>Basis of Report PG 5. |            |

## ORGANIZATIONAL PROFILE

| Indicator | Disclosure Description  | Report Section                     | Report Page / External Document Link  | Disclosure |
|-----------|---|------------------------------------|---|------------|
| G4-3      | Report the name of the organization.  | 2015 Annual Report to Shareholders | 2015 Annual Report to Shareholders<br><br><a href="https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2015.pdf?bc=24492737">https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2015.pdf?bc=24492737</a><br><br>P. 1 |            |
| G4-4      | Report the primary brands, products, and services.  | 2015 Annual Report to Shareholders | <a href="https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2015.pdf?bc=24492737">https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2015.pdf?bc=24492737</a><br><br>P. 1   |            |
| G4-5      | Report the location of the organization's headquarters.   | 2015 Annual Report to Shareholders | <a href="https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2015.pdf?bc=24492737">https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2015.pdf?bc=24492737</a><br><br>P. 1   |            |
| G4-6      | Report the number of countries where the organization operates, and names of countries where either the organization has significant operations or that are specifically relevant to the sustainability topics covered in the report. | 2015 Annual Report to Shareholders | <a href="https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2015.pdf?bc=24492737">https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2015.pdf?bc=24492737</a><br><br>P. 1   |            |

## ORGANIZATIONAL PROFILE

| Indicator | Disclosure Description   | Report Section                     | Report Page / External Document Link  | Disclosure |
|-----------|--|------------------------------------|---|------------|
| G4-7      | Report the nature of ownership and legal form.   | 2015 Annual Report to Shareholders | <a href="https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2015.pdf?bc=24492737">https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2015.pdf?bc=24492737</a><br><br>P. 1 |            |
| G4-8      | Report the markets served (including geographic breakdown, sectors served, and types of customers and beneficiaries).  | 2015 Annual Report to Shareholders | <a href="https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2015.pdf?bc=24492737">https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2015.pdf?bc=24492737</a><br><br>P. 1 |            |
| G4-9      | Report the scale of the organization, including: <ul style="list-style-type: none"> <li>▪ Total number of employees</li> <li>▪ Total number of operations</li> <li>▪ Net sales (for private sector organizations) or net revenues (for public sector organizations)</li> <li>▪ Total capitalization broken down in terms of debt and equity (for private sector organizations)</li> <li>▪ Quantity of products or services provided</li> </ul> | 2015 Annual Report to Shareholders | <a href="https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2015.pdf?bc=24492737">https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2015.pdf?bc=24492737</a><br><br>P. 1 |            |

**ORGANIZATIONAL PROFILE**

| Indicator | Disclosure Description   | Report Section             | Report Page / External Document Link   | Disclosure   |
|-----------|--|----------------------------|--|--|
| G4-10     | <ul style="list-style-type: none"> <li>a. Report the total number of employees by employment contract and gender.</li> <li>b. Report the total number of permanent employees by employment type and gender.</li> <li>c. Report the total workforce by employees and supervised workers and by gender.</li> <li>d. Report the total workforce by region and gender.</li> <li>e. Report whether a substantial portion of the organization’s work is performed by workers who are legally recognized as self-employed, or by individuals other than employees or supervised workers, including employees and supervised employees of contractors.</li> <li>f. Report any significant variations in employment numbers (such as seasonal variations in employment in the tourism or agricultural industries).</li> </ul> | CSR Annual Report, Culture | <p>Demographic information on our global employees can be found on p. 23 of our CSR Annual Report. Further segmentation by age group is currently unavailable.</p> <p>P. 19-21</p> |  |
| G4-11     | Report the percentage of total employees covered by collective bargaining agreements.  |                            |  | There are no Northern Trust employees are covered by collective bargaining agreements. |

## ORGANIZATIONAL PROFILE

| Indicator | Disclosure Description                    | Report Section | Report Page / External Document Link | Disclosure   |
|-----------|---|----------------|--------------------------------------|--|
| G4-12     | Describe the organization's supply chain. |                |                                      | <p>Northern Trust's supply chain supports our global footprint through the use of suppliers of various types and sizes. These firms provide services in the categories of business services, technology and market data. These suppliers allow Northern Trust to support the needs of our clients and partners in our North America, EMEA and APAC regions.</p> <p>Our Supplier Relationship Management (SRM) is a systematic approach to ensure that an appropriate level of oversight and structure is established with each of Northern Trust's suppliers. This process will maximize relationships with suppliers resulting in ongoing risk mitigation and delivered value that meets or exceeds contracted value. We continue to invest in and review new SRM techniques and processes that will increase coverage to more supply categories.</p> |

## ORGANIZATIONAL PROFILE

| Indicator | Disclosure Description  | Report Section   | Report Page / External Document Link  | Disclosure |
|-----------|---|--|---|------------|
| G4-13     | <p>Report any significant changes during the reporting period regarding the organization's size, structure, ownership, or its supply chain, including:</p> <ul style="list-style-type: none"> <li>a. Changes in the location of, or changes in, operations, including facility openings, closings, and expansions</li> <li>b. Changes in the share capital structure and other capital formation, maintenance, and alteration operations (for private sector organizations)</li> <li>c. Changes in the location of suppliers, the structure of the supply chain, or in relationships with suppliers, including selection and termination</li> </ul> | CSR Annual Report, Basis of Report                       | P. 5  |            |
| G4-14     | Report whether and how the precautionary approach or principle is addressed by the organization.  | 2015 Northern Trust Proxy Statement                      | <a href="https://www.northerntrust.com/documents/annual-reports/northern-trust-proxy-statement-2015.pdf?bc=24069363">https://www.northerntrust.com/documents/annual-reports/northern-trust-proxy-statement-2015.pdf?bc=24069363</a> |            |
| G4-15     | List externally developed economic, environmental and social charters, principles, or other initiatives to which the organization subscribes or which it endorses.  | CSR Annual Report, Selected Memberships and Associations | P. 9  |            |
| G4-16     | <p>List memberships of associations (such as industry associations) and national or international advocacy organizations in which the organization:</p> <ul style="list-style-type: none"> <li>a. Holds a position on the governance body</li> <li>b. Participates in projects or committees</li> <li>c. Provides substantive funding beyond routine membership dues</li> <li>d. Views membership as strategic</li> </ul>   | CSR Annual Report, Selected Memberships and Associations | P. 9  |            |

## IDENTIFIED MATERIAL ASPECTS AND BOUNDARIES

| Indicator | Disclosure Description  | Report Section   | Report Page / External Document Link  | Disclosure |
|-----------|---|--|---|------------|
| G4-17     | <ul style="list-style-type: none"> <li>a. List all entities included in the organization's consolidated financial statements or equivalent documents.</li> <li>b. Report whether any entity included in the organization's consolidated financial statements or equivalent documents is not covered by the report.</li> </ul> | 2015 Annual Report to Shareholders   | <a href="https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2015.pdf?bc=24745977">https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2015.pdf?bc=24745977</a><br>P. 1 |            |
| G4-18     | <ul style="list-style-type: none"> <li>a. Explain the process for defining the report content and the Aspect Boundaries.</li> <li>b. Explain how the organization has implemented the Reporting Principles for Defining Report Content.</li> </ul>  | CSR Annual Report, Letter from Chairman and CEO, Rick Waddell and Head of CSR and Global Diversity & Inclusion, Connie Lindsey | P. 3  |            |
| G4-19     | List all the material Aspects identified in the process for defining report content.  | CSR Annual Report, Basis of Report   | P. 5  |            |

## IDENTIFIED MATERIAL ASPECTS AND BOUNDARIES

| Indicator | Disclosure Description   | Report Section                     | Report Page / External Document Link | Disclosure |
|-----------|--|------------------------------------|--------------------------------------|------------|
| G4-20     | <p>For each material Aspect, report the Aspect Boundary within the organization, as follows:</p> <ul style="list-style-type: none"> <li>a. Report whether the Aspect is material within the organization</li> </ul> <p>If the Aspect is not material for all entities within the organization (as described in G4-17), select one of the following two approaches and report either:</p> <ul style="list-style-type: none"> <li>b. The list of entities or groups of entities included in G4-17 for which the Aspect is not material or</li> <li>c. The list of entities or groups of entities included in G4-17 for which the Aspects is material</li> <li>d. Report any specific limitation regarding the Aspect Boundary within the organization</li> </ul> | CSR Annual Report, Basis of Report | P. 5                                 |            |
| G4-21     | <p>For each material Aspect, report the Aspect Boundary outside the organization, as follows:</p> <ul style="list-style-type: none"> <li>a. Report whether the Aspect is material outside of the organization</li> </ul> <p>If the Aspect is material outside of the organization, identify the entities, groups of entities or elements for which the Aspect is material. In addition, describe the geographical location where the Aspect is material for the entities identified</p> <ul style="list-style-type: none"> <li>b. Report any specific limitation regarding the Aspect Boundary outside the organization</li> </ul>   | CSR Annual Report, Basis of Report | P. 5                                 |            |
| G4-22     | Report the effect of any restatements of information provided in previous reports, and the reasons for such restatements.  | CSR Annual Report, Basis of Report | P. 5                                 |            |
| G4-23     | Report significant changes from previous reporting periods in the Scope and Aspect Boundaries.   | CSR Annual Report, Basis of Report | P. 5                                 |            |



## STAKEHOLDER ENGAGEMENT

| Indicator | Disclosure Description  | Report Section                     | Report Page / External Document Link | Disclosure |
|-----------|---|------------------------------------|--------------------------------------|------------|
| G4-24     | Provide a list of stakeholder groups engaged by the organization.   | CSR Annual Report,                 | P. 15                                |            |
| G4-25     | Report the basis for identification and selection of stakeholders with whom to engage.  | CSR Annual Report,                 | P. 15                                |            |
| G4-26     | Report the organization's approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, and an indication of whether any of the engagement was undertaken specifically as part of the report preparation process.                   | CSR Annual Report,                 | P. 15                                |            |
| G4-27     | Report 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. Report the stakeholder groups that raised each of the key topics and concerns. | CSR Annual Report, Basis of Report | P. 5                                 |            |

## REPORT PROFILE

| Indicator | Disclosure Description  | Report Section                     | Report Page / External Document Link | Disclosure       |
|-----------|---|------------------------------------|--------------------------------------|------------------|
| G4-28     | Reporting period (such as fiscal or calendar year) for information provided.  | CSR Annual Report, Basis of Report | P. 5                                 | Basis for Report |
| G4-29     | Date of most recent previous report   | CSR Annual Report, Basis of Report | P. 5                                 | Basis for Report |
| G4-30     | Reporting cycle (such as annual, biennial).   | CSR Annual Report, Basis of Report | P. 5                                 | Basis for Report |
| G4-31     | Provide the contact point for questions regarding the report or its contents.   | CSR Annual Report, Basis of Report | P. 5                                 | Basis for Report |
| G4-32     | <ul style="list-style-type: none"> <li>a. Report the 'in accordance' option the organization has chosen.</li> <li>b. Report the GRI Content Index for the chosen option (see tables below).</li> <li>c. Report the reference to the External Assurance Report, if the report has been externally assured. GRI recommends the use of external assurance but it is not a requirement to be 'in accordance' with the Guidelines.</li> </ul>  | CSR Annual Report, Basis of Report | P. 5                                 | Basis for Report |
| G4-33     | <ul style="list-style-type: none"> <li>a. Report the organization's policy and current practice with regard to seeking external assurance for the report.</li> <li>b. If not included in the assurance report accompanying the sustainability report, report the scope and basis of any external assurance provided.</li> <li>c. Report the relationship between the organization and the assurance providers.</li> <li>d. Report whether the highest governance body or senior executives are involved in seeking assurance for the organization's sustainability report.</li> </ul> | CSR Annual Report, Basis of Report | P. 5                                 | Basis for Report |

## GOVERNANCE

| Indicator | Disclosure Description   | Report Section | Report Page / External Document Link  | Disclosure   |
|-----------|--|----------------|---|--|
| G4-34     | Report the governance structure of the organization, including committees of the highest governance body. Identify any committees responsible for decision-making on economic, environmental and social impacts.                               |                | Northern Trust Board of Directors<br>Business Strategy Committee Charter<br><br><a href="https://www.northerntrust.com/documents/governance/charter-business-strategy.pdf?bc=23988584">https://www.northerntrust.com/documents/governance/charter-business-strategy.pdf?bc=23988584</a> |  |
| G4-35     | Report the process for delegating authority for economic, environmental and social topics from the highest governance body to senior executives and other employees.   |                | Northern Trust Board of Directors<br>Business Strategy Committee Charter<br><br><a href="https://www.northerntrust.com/documents/governance/charter-business-strategy.pdf?bc=2398858">https://www.northerntrust.com/documents/governance/charter-business-strategy.pdf?bc=2398858</a>   |  |
| G4-36     | Report whether the organization has appointed an executive-level position or positions with responsibility for economic, environmental and social topics, and whether post holders report directly to the highest governance body.             |                |   | Northern Trust's head of Corporate Social Responsibility and Global Diversity & Inclusion is responsible for the design and implementation of the global Corporate Social Responsibility and Global Diversity & Inclusion strategy and the development of goals, policies and programs appropriate to the brand and business unit strategies. In addition, it oversees and leads the firm's response to environmental matters as well as social issues within the marketplace, workplace and community. This role reports to the Chairman and Chief Executive Officer. |
| G4-37     | Report processes for consultation between stakeholders and the highest governance body on economic, environmental and social topics. If consultation is delegated, describe to whom and any feedback processes to the highest governance body. |                | <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>   |  |



## GOVERNANCE

| Indicator | Disclosure Description   | Report Section                      | Report Page / External Document Link  | Disclosure   |
|-----------|--|-------------------------------------|---|--|
| G4-38     | <p>Report the composition of the highest governance body and its committees by:</p> <ul style="list-style-type: none"> <li>a. Executive or non-executive</li> <li>b. Independence</li> <li>c. Tenure on the governance body</li> <li>d. Number of each individual's other significant positions and commitments, and the nature of the commitments</li> <li>e. Gender</li> <li>f. Membership of under-represented social groups</li> <li>g. Competences relating to economic, environmental and social impacts</li> <li>h. Stakeholder representation</li> </ul> | 2015 Northern Trust Proxy Statement | <p><a href="https://www.northerntrust.com/documents/annual-reports/northern-trust-proxy-statement-2015.pdf?bc=24069363">https://www.northerntrust.com/documents/annual-reports/northern-trust-proxy-statement-2015.pdf?bc=24069363</a></p> <p>P. 13</p> |  |
| G4-39     | Report whether the Chair of the highest governance body is also an executive officer (and, if so, his or her function within the organization's management and the reasons for this arrangement).  |                                     |   | <p>Our board of directors' leadership structure includes the chairman and chief executive officer, who is the only non-independent board member, and a lead director, who is elected annually by independent directors. The board of directors has determined that combining the positions of chairman and CEO is the most appropriate for the Corporation at this time. Having one person as chairman and CEO provides unified leadership and direction to the Corporation and strengthens the ability of the CEO to develop and implement strategic initiatives and respond efficiently in crisis situations. The board believes the combination of the chairman and CEO positions is appropriate in light of the substantial independent oversight provided by the board of directors. The board also believes that the desire for independent leadership of the board is sufficiently balanced by the prominent role of the lead director.</p> |

**GOVERNANCE**

| Indicator | Disclosure Description   | Report Section                  | Report Page / External Document Link  | Disclosure |
|-----------|--|---------------------------------|---|------------|
| G4-40     | <p>Report the nomination and selection processes for the highest governance body and its committees, and the criteria used for nominating and selecting highest governance body members, including:</p> <ul style="list-style-type: none"> <li>a. Whether and how diversity is considered</li> <li>b. Whether and how independence is considered</li> <li>c. Whether and how expertise and experience relating to economic, environmental and social topics are considered</li> <li>d. Whether and how stakeholders (including shareholders) are involved</li> </ul> | Corporate Governance Guidelines | <a href="https://www.northerntrust.com/documents/governance/corporate-governance-guidelines.pdf?bc=23956853">https://www.northerntrust.com/documents/governance/corporate-governance-guidelines.pdf?bc=23956853</a> |            |
| G4-41     | <p>Report processes for the highest governance body to ensure conflicts of interest are avoided and managed.</p> <p>Report whether conflicts of interest are disclosed to stakeholders, including, as a minimum:</p> <ul style="list-style-type: none"> <li>a. Cross-board membership</li> <li>b. Cross-shareholding with suppliers and other stakeholders</li> <li>c. Existence of controlling shareholder</li> <li>d. Related party disclosures</li> </ul>   | Code of Business Conduct        | <a href="https://www.northerntrust.com/documents/governance/code-of-business-conduct-ethics.pdf?bc=23956853">https://www.northerntrust.com/documents/governance/code-of-business-conduct-ethics.pdf?bc=23956853</a> |            |
| G4-42     | <p>Report the highest governance body's and senior executives' roles in the development, approval, and updating of the organization's purpose, value or mission statements, strategies, policies, and goals related to economic, environmental and social impacts.</p>   | Corporate Governance Guidelines | <a href="https://www.northerntrust.com/documents/governance/corporate-governance-guidelines.pdf?bc=23956851">https://www.northerntrust.com/documents/governance/corporate-governance-guidelines.pdf?bc=23956851</a> |            |

**GOVERNANCE**

| Indicator | Disclosure Description  | Report Section                  | Report Page / External Document Link  | Disclosure |
|-----------|---|---------------------------------|---|------------|
| G4-43     | Report the measures taken to develop and enhance the highest governance body’s collective knowledge of economic, environmental and social topics.   | Corporate Governance Guidelines | <a href="https://www.northerntrust.com/documents/governance/corporate-governance-guidelines.pdf?bc=23956852">https://www.northerntrust.com/documents/governance/corporate-governance-guidelines.pdf?bc=23956852</a> |            |
| G4-44     | <ul style="list-style-type: none"> <li>a. Report the processes for evaluation of the highest governance body’s performance with respect to governance of economic, environmental and social topics. Report whether such evaluation is independent or not, and its frequency. Report whether such evaluation is a self-assessment.</li> <li>b. Report actions taken in response to evaluation of the highest governance body’s performance with respect to governance of economic, environmental and social topics, including, as a minimum, changes in membership and organizational practice.</li> </ul> | Corporate Governance Guidelines | <a href="https://www.northerntrust.com/documents/governance/corporate-governance-guidelines.pdf?bc=23956853">https://www.northerntrust.com/documents/governance/corporate-governance-guidelines.pdf?bc=23956853</a> |            |
| G4-45     | <ul style="list-style-type: none"> <li>a. Report the highest governance body’s role in the identification and management of economic, environmental and social impacts, risks, and opportunities. Include the highest governance body’s role in the implementation of due diligence processes.</li> <li>b. Report whether stakeholder consultation is used to support the highest governance body’s identification and management of economic, environmental and social impacts, risks, and opportunities.</li> </ul>   | Corporate Governance Guidelines | <a href="https://www.northerntrust.com/documents/governance/corporate-governance-guidelines.pdf?bc=23956853">https://www.northerntrust.com/documents/governance/corporate-governance-guidelines.pdf?bc=23956853</a> |            |

**GOVERNANCE**

| Indicator | Disclosure Description  | Report Section                  | Report Page / External Document Link  | Disclosure   |
|-----------|---|---------------------------------|---|--|
| G4-46     | Report the highest governance body's role in reviewing the effectiveness of the organization's risk management processes for economic, environmental and social topics. | Corporate Governance Guidelines | <a href="https://www.northerntrust.com/documents/governance/corporate-governance-guidelines.pdf?bc=23956854">https://www.northerntrust.com/documents/governance/corporate-governance-guidelines.pdf?bc=23956854</a> |  |
| G4-47     | Report the frequency of the highest governance body's review of economic, environmental and social impacts, risks, and opportunities.                                   | Corporate Governance Guidelines | <a href="https://www.northerntrust.com/documents/governance/corporate-governance-guidelines.pdf?bc=23956853">https://www.northerntrust.com/documents/governance/corporate-governance-guidelines.pdf?bc=23956853</a> |  |
| G4-48     | Report the highest committee or position that formally reviews and approves the organization's sustainability report and ensures that all material Aspects are covered. |                                 |   | Under the direction of the Head of Corporate Social Responsibility and Global Diversity & Inclusion Northern Trust's CSR Annual report is compiled and reviewed in accordance with internal procedures for external reporting. Additionally, senior staff performs regular reviews of disclosed information. |



**GOVERNANCE**

| Indicator | Disclosure Description   | Report Section  | Report Page / External Document Link  | Disclosure |
|-----------|--|---|---|------------|
| G4-49     | Report the process for communicating critical concerns to the highest governance body.   | Corporate Governance Guidelines   | <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>   |            |
| G4-51     | <p>a. Report the remuneration policies for the highest governance body and senior executives for the below types of remuneration:</p> <ul style="list-style-type: none"> <li>a. Fixed pay and variable pay:</li> <li>b. Performance-based pay</li> <li>c. Equity-based pay</li> <li>d. Bonuses</li> <li>e. Deferred or vested shares</li> <li>f. Sign-on bonuses or recruitment incentive payments</li> <li>g. Termination payments</li> <li>h. Clawbacks</li> <li>i. Retirement benefits, including the difference between benefit schemes and contribution rates for the highest governance body, senior executives, and all other employees</li> </ul> <p>b. Report how performance criteria in the remuneration policy relate to the highest governance bodies and senior executives' economic, environmental and social objectives.</p> | <p>Compensation and Benefits Committee Charter</p> <p>2015 Northern Trust Proxy Statement</p> | <p><a href="https://www.northerntrust.com/documents/governance/charter-compensation-benefits.pdf?bc=23956856">https://www.northerntrust.com/documents/governance/charter-compensation-benefits.pdf?bc=23956856</a></p> <p><a href="https://www.northerntrust.com/documents/annual-reports/northern-trust-proxy-statement-2015.pdf?bc=23956730">https://www.northerntrust.com/documents/annual-reports/northern-trust-proxy-statement-2015.pdf?bc=23956730</a></p> |            |
| G4-53     | Report how stakeholders' views are sought and taken into account regarding remuneration, including the results of votes on remuneration policies and proposals, if applicable.   | Contact Board of Directors  | <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>   |            |

## ETHICS AND INTEGRITY

| Indicator | Disclosure Description   | Report Section                      | Report Page / External Document Link  | Disclosure |
|-----------|--|-------------------------------------|---|------------|
| G4-56     | Describe the organization's values, principles, standards and norms of behavior such as codes of conduct and codes of ethics.  | Code of Business Conduct and Ethics | <a href="https://www.northerntrust.com/documents/governance/code-of-business-conduct-ethics.pdf?bc=23956853">https://www.northerntrust.com/documents/governance/code-of-business-conduct-ethics.pdf?bc=23956853</a> |            |
| G4-57     | Report the internal and external mechanisms for seeking advice on ethical and lawful behavior, and matters related to organizational integrity, such as helplines or advice lines.   | Code of Business Conduct and Ethics | <a href="https://www.northerntrust.com/documents/governance/code-of-business-conduct-ethics.pdf?bc=23956853">https://www.northerntrust.com/documents/governance/code-of-business-conduct-ethics.pdf?bc=23956853</a> |            |
| G4-58     | Report the internal and external mechanisms for reporting concerns about unethical or unlawful behavior, and matters related to organizational integrity, such as escalation through line management, whistleblowing mechanisms or hotlines. | Code of Business Conduct and Ethics | <a href="https://www.northerntrust.com/documents/governance/code-of-business-conduct-ethics.pdf?bc=23956853">https://www.northerntrust.com/documents/governance/code-of-business-conduct-ethics.pdf?bc=23956853</a> |            |

SPECIFIC INDICATORS  
 CATEGORY: ECONOMIC  
 ASPECT: ECONOMIC PERFORMANCE

| Indicator | Disclosure Description   | Report Section                    | Report Page / External Document Link  | Disclosure   |
|-----------|--|-----------------------------------|---|--|
| G4-DMA    | Generic Disclosures on Management Approach   |                                   |   |  |
| G4-EC1    | Direct economic value generated and distributed  | CSR Annual Report, Infographic    | P. 20   |  |
| G4-EC2    | Financial implications and other risks and opportunities for the organization's activities due to climate change |                                   | <a href="#">2016 CDP Submission.</a>  |  |
| G4-EC3    | Coverage of the organization's defined benefit plan obligations  | 2015 Northern Trust Annual Report | <a href="https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2015.pdf?bc=24745977">https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2015.pdf?bc=24745977</a><br><br>P. 57-59 |  |
| G4-EC4    | Financial assistance received from government  |                                   |   | Northern Trust did not receive financial assistance from the government in 2015. |

SPECIFIC INDICATORS  
 CATEGORY: ECONOMIC  
 ASPECT: MARKET PRESENCE

| Indicator | Disclosure Description   | Report Section | Report Page / External Document Link | Disclosure   |
|-----------|--|----------------|--------------------------------------|--|
| G4-DMA    | Generic Disclosures on Management Approach   |                |                                      |  |
| G4-EC6    | Proportion of senior management hired from the local community at significant locations of operation |                |                                      | <p>Talent identification, sourcing and recruiting strategies generally are targeted for specific locations using a variety of channels that include job boards, colleges, networks, associations and online social networks</p> <p>We do not have a global policy in place for granting preference to local residents when hiring in significant locations of operation. Hiring decisions are based on a variety of factors, including educational background, relevant experience, past accomplishments, professional licensing where required, and strong evidence of integrity and ethical behavior</p> <p>Operational changes that lead to job elimination, we meet or exceed the notification requirements of applicable laws but also make every effort to help partners find alternative positions within the company</p> |

SPECIFIC INDICATORS  
 CATEGORY: ECONOMIC  
 ASPECT: INDIRECT ECONOMIC IMPACTS

| Indicator | Disclosure Description  | Report Section     | Report Page / External Document Link | Disclosure |
|-----------|---|--------------------|--------------------------------------|------------|
| G4-DMA    | Generic Disclosures on Management Approach                                  | CSR Annual Report, | P. 10                                |            |
| G4-EC7    | Development and impact of infrastructure investments and services supported | CSR Annual Report, | P. 11                                |            |
| G4-EC8    | Significant indirect economic impacts, including the extent of impacts      | CSR Annual Report, | P. 11                                |            |

SPECIFIC INDICATORS  
 CATEGORY: ECONOMIC  
 ASPECT: PROCUREMENT PRACTICES

| Indicator | Disclosure Description  | Report Section    | Report Page / External Document Link | Disclosure  |
|-----------|---|-------------------|--------------------------------------|---|
| G4-DMA    | Generic Disclosures on Management Approach                                      | CSR Annual Report | P. 16                                |   |
| G4-EC9    | Proportion of spending on local suppliers at significant locations of operation |                   |                                      | <p>Our Global Procurement department is led by a senior-level manager who drives the strategy and sets procurement policies worldwide. Northern Trust expects suppliers to employ high standards of recycling and waste-management governance and conduct business in an ethical, legal and socially responsible manner. We are committed to making progress toward integrating ethical, social and environmental factors into our procurement practices. We continue to work on ways to integrate these standards into our supplier management policies and practices. We also check our suppliers against the U.S. Office of Foreign Asset Control to ensure we comply with any economic and trade sanctions.</p> |

SPECIFIC INDICATORS  
 CATEGORY: ENVIRONMENTAL  
 ASPECT: ENERGY

| Indicator | Disclosure Description                     | Report Section    | Report Page / External Document Link | Disclosure               |
|-----------|--|-------------------|--------------------------------------|--------------------------|
| G4-DMA    | Generic Disclosures on Management Approach | CSR Annual Report | P. 17                                |                          |
| G4-EN3    | Energy consumption within the organization |                   |                                      | <a href="#">2016 CDP</a> |

SPECIFIC INDICATORS  
 CATEGORY: ENVIRONMENTAL  
 ASPECT: EMISSIONS

| Indicator | Disclosure Description                                   | Report Section                       | Report Page / External Document Link | Disclosure |
|-----------|--|--------------------------------------|--------------------------------------|------------|
| G4-DMA    | Generic Disclosures on Management Approach               | CSR Annual Report                    | P17                                  |            |
| G4-EN15   | Direct greenhouse gas (GHG) emissions (Scope 1)          | Supplemental GHG Emissions Statement |                                      |            |
| G4-EN16   | Energy indirect greenhouse gas (GHG) emissions (Scope 2) | Supplemental GHG Emissions Statement |                                      |            |
| G4-EN17   | Other indirect greenhouse gas (GHG) emissions (Scope 3)  | Supplemental GHG Emissions Statement |                                      |            |
| G4-EN18   | Greenhouse gas (GHG) emissions intensity                 | Supplemental GHG Emissions Statement |                                      |            |
| G4-EN19   | Reduction of greenhouse gas (GHG) emissions              | Supplemental GHG Emissions Statement |                                      |            |
| G4-EN20   | Emissions of ozone-depleting substances (ODS)            | Supplemental GHG Emissions Statement |                                      |            |
| G4-EN21   | NOX, SOX, and other significant air emissions            | Supplemental GHG Emissions Statement |                                      |            |



SPECIFIC INDICATORS  
 CATEGORY: ENVIRONMENTAL  
 ASPECT: COMPLIANCE

| Indicator | Disclosure Description  | Report Section | Report Page / External Document Link | Disclosure  |
|-----------|---|----------------|--------------------------------------|---|
| G4-DMA    | Generic Disclosures on Management Approach  |                |                                      |   |
| G4-EN29   | Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations |                |                                      | Northern Trust's policy is to comply with all applicable laws and regulations in all countries where they operate. Northern Trust has never been fined or sanctioned for failure to comply with environmental laws and regulations. |

SPECIFIC INDICATORS

CATEGORY: ENVIRONMENTAL

**ASPECT: ENVIRONMENTAL GRIEVANCE MECHANISMS**

| Indicator | Disclosure Description  | Report Section | Report Page / External Document Link | Disclosure  |
|-----------|---|----------------|--------------------------------------|---|
| G4-DMA    | Generic Disclosures on Management Approach  |                |                                      |   |
| G4-EN34   | Number of grievances about environmental impacts filed, addressed, and resolved through formal grievance mechanisms |                |                                      | Northern Trust's policy is to comply with all applicable laws and regulations in all countries where they operate. Northern Trust has never been fined or sanctioned for failure to comply with environmental laws and regulations. |

SPECIFIC INDICATORS  
 CATEGORY: SOCIAL  
 SUB-CATEGORY: LABOR PRACTICES AND DECENT WORK  
 ASPECT: EMPLOYMENT

| Indicator | Disclosure Description  | Report Section | Report Page / External Document Link | Disclosure  |
|-----------|---|----------------|--------------------------------------|---|
| G4-DMA    | Generic Disclosures on Management Approach  |                |                                      |   |
| G4-LA2    | Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation |                |                                      | <p>- life insurance; health care/medical insurance; disability/critical illness insurance; generous time-off policies including paid vacation and sick days, maternity, paternity and adoption paid leaves of absences; education benefits; and work/life services</p> <p>- available to partners who are scheduled to work 20 or more hours per week</p> |

SPECIFIC INDICATORS

CATEGORY: SOCIAL

SUB-CATEGORY: LABOR PRACTICES AND DECENT WORK

**ASPECT: TRAINING AND EDUCATION**

| Indicator | Disclosure Description   | Report Section | Report Page / External Document Link | Disclosure   |
|-----------|--|----------------|--------------------------------------|--|
| G4-DMA    | Generic Disclosures on Management Approach   |                |                                      |  |
| G4-LA9    | Average hours of training per year per employee by gender, and by employee category                                      |                |                                      | Globally, all partners completed, on average, 23 hours of training in 2015. All employees regardless of gender and/or job category have access to training.                    |
| G4-LA11   | Percentage of employees receiving regular performance and career development reviews, by gender and by employee category |                |                                      | 91% of all employees had a performance document completed in 2015.<br><br>The completion rate for individual contributors was 84 %<br>The completion rate for managers was 94% |

SPECIFIC INDICATORS

CATEGORY: SOCIAL

SUB-CATEGORY: LABOR PRACTICES AND DECENT WORK

**ASPECT: DIVERSITY AND EQUAL OPPORTUNITY**

| Indicator | Disclosure Description   | Report Section             | Report Page / External Document Link  | Disclosure |
|-----------|--|----------------------------|---|------------|
| G4-DMA    | Generic Disclosures on Management Approach   |                            |   |            |
| G4-LA12   | Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity | CSR Annual Report, Culture | <p>Demographic information on our global employees can be found on p. 21 of our CSR Annual Report. Further segmentation by age group is currently unavailable.</p> <p>Demographic information on our Board of Directors can be found at:</p> <p><a href="https://www.northerntrust.com/documents/annual-reports/northern-trust-proxy-statement-2015.pdf?bc=24119948">https://www.northerntrust.com/documents/annual-reports/northern-trust-proxy-statement-2015.pdf?bc=24119948</a></p> |            |

SPECIFIC INDICATORS

CATEGORY: SOCIAL

SUB-CATEGORY: LABOR PRACTICES AND DECENT WORK

**ASPECT: LABOR PRACTICES GRIEVANCE MECHANISMS**

| Indicator | Disclosure Description  | Report Section | Report Page / External Document Link | Disclosure   |
|-----------|---|----------------|--------------------------------------|--|
| G4-DMA    | Generic Disclosures on Management Approach  |                |                                      |  |
| G4-LA16   | Number of grievances about labor practices filed, addressed, and resolved through formal grievance mechanisms |                |                                      | <p>Northern Trust's policy is to comply with all applicable laws and regulations in all countries where we operate.</p> <p>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:</p> <p><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>.</p> |

SPECIFIC INDICATORS  
 CATEGORY: SOCIAL  
 SUB-CATEGORY: HUMAN RIGHTS  
**ASPECT: INVESTMENT**

| Indicator | Disclosure Description  | Report Section             | Report Page / External Document Link | Disclosure  |
|-----------|---|----------------------------|--------------------------------------|---|
| G4-DMA    | Generic Disclosures on Management Approach  |                            |                                      |   |
| G4-HR2    | Total hours of employee training on human rights policies or procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained | CSR Annual Report, Culture | p. 19-21                             | Within 60 days of hire, employees must complete Diversity and Inclusion training. In 2015, the completion rate was 100 percent. |

SPECIFIC INDICATORS  
 CATEGORY: SOCIAL  
 SUB-CATEGORY: HUMAN RIGHTS  
**ASPECT: NON-DISCRIMINATION**

| Indicator | Disclosure Description   | Report Section | Report Page / External Document Link | Disclosure  |
|-----------|--|----------------|--------------------------------------|---|
| G4-DMA    | Generic Disclosures on Management Approach                               |                |                                      |   |
| G4-HR3    | Total number of incidents of discrimination and corrective actions taken |                |                                      | <p>Northern Trust's policy is to comply with all applicable laws and regulations in all countries where we operate.</p> <p>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:</p> <p><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></p> <p>An excerpt from our Non-Discrimination Policy states:</p> <p>"It is the policy of The Northern Trust Company to afford equal opportunity in all phases of employment without regard to an individual's age, race, color, religion, creed, gender, national origin, citizenship status, marital status, pregnancy, sexual orientation, gender identity, gender expression, genetic tests and information, physical or mental disability, protected veteran status or any other legally protected status."</p> |



SPECIFIC INDICATORS

CATEGORY: SOCIAL

SUB-CATEGORY: HUMAN RIGHTS

**ASPECT: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

| Indicator | Disclosure Description   | Report Section | Report Page / External Document Link | Disclosure  |
|-----------|--|----------------|--------------------------------------|---|
| G4-DMA    | Generic Disclosures on Management Approach   |                |                                      |   |
| G4-HR4    | Operations and suppliers identified in which the right to exercise freedom of association and collective bargaining may be violated or at significant risk, and measures taken to support these rights |                |                                      | <p>Northern Trust has the following core expectations of all of its suppliers:</p> <ul style="list-style-type: none"> <li>Evidence of the capability to provide the highest quality goods and/or services</li> <li>Commitment to mutually agreed service standards</li> <li>Sufficient financial resources to be a reliable and consistent provider</li> <li>Adherence to the law and regulations in all regards</li> <li>Compliance with Northern Trust's centralized procurement program and its standards</li> </ul> |

SPECIFIC INDICATORS  
 CATEGORY: SOCIAL  
 SUB-CATEGORY: SOCIETY  
**ASPECT: LOCAL COMMUNITIES**

| Indicator | Disclosure Description   | Report Section             | Report Page / External Document Link | Disclosure |
|-----------|--|----------------------------|--------------------------------------|------------|
| G4-DMA    | Generic Disclosures on Management Approach   |                            |                                      |            |
| G4-SO1    | Percentage of operations with implemented local community engagement, impact assessments, and development programs | CSR Annual Report, Culture | P. 22                                |            |

SPECIFIC INDICATORS  
 CATEGORY: SOCIAL  
 SUB-CATEGORY: SOCIETY  
**ASPECT: ANTI-CORRUPTION**

| Indicator | Disclosure Description  | Report Section | Report Page / External Document Link | Disclosure   |
|-----------|---|----------------|--------------------------------------|--|
| G4-DMA    | Generic Disclosures on Management Approach  |                |                                      |  |
| G4-SO3    | Total number and percentage of operations assessed for risks related to corruption and the significant risks identified |                |                                      | <p>Northern Trust's policy is to comply with all applicable laws and regulations in all countries where we operate.</p> <p>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:</p> <p><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>.</p> |

SPECIFIC INDICATORS  
 CATEGORY: SOCIAL  
 SUB-CATEGORY: SOCIETY  
 ASPECT: PUBLIC POLICY

| Indicator | Disclosure Description  | Report Section | Report Page / External Document Link  | Disclosure |
|-----------|---|----------------|---|------------|
| G4-DMA    | Generic Disclosures on Management Approach                                  |                |   |            |
| G4-SO6    | Total value of political contributions by country and recipient/beneficiary |                | <p>Northern Trust Corporation Political Action Committee<br/> <a href="http://docquery.fec.gov/cgi-bin/fecimg/?C00024935">http://docquery.fec.gov/cgi-bin/fecimg/?C00024935</a></p> <p>Northern Trust Corporation Federal Political Action Committee<br/> <a href="http://docquery.fec.gov/cgi-bin/fecimg/?C00515148">http://docquery.fec.gov/cgi-bin/fecimg/?C00515148</a></p> |            |

SPECIFIC INDICATORS  
 CATEGORY: SOCIAL  
 SUB-CATEGORY: SOCIETY  
**ASPECT: ANTI-COMPETITIVE BEHAVIOR**

| Indicator | Disclosure Description   | Report Section | Report Page / External Document Link | Disclosure   |
|-----------|--|----------------|--------------------------------------|--|
| G4-DMA    | Generic Disclosures on Management Approach   |                |                                      |  |
| G4-SO7    | Total number of legal actions for anti-competitive behavior, anti-trust, and monopoly practices and their outcomes |                |                                      | <p>Northern Trust's policy is to comply with all applicable laws and regulations in all countries where we operate.</p> <p>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:</p> <p><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>.</p> |

SPECIFIC INDICATORS  
 CATEGORY: SOCIAL  
 SUB-CATEGORY: SOCIETY  
**ASPECT: COMPLIANCE**

| Indicator | Disclosure Description  | Report Section | Report Page / External Document Link | Disclosure   |
|-----------|---|----------------|--------------------------------------|--|
| G4-DMA    | Generic Disclosures on Management Approach  |                |                                      |  |
| G4-SO8    | Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations |                |                                      | <p>Northern Trust's policy is to comply with all applicable laws and regulations in all countries where we operate.</p> <p>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:</p> <p><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>.</p> |

SPECIFIC INDICATORS

CATEGORY: SOCIAL

SUB-CATEGORY: SOCIETY

**ASPECT: GRIEVANCE MECHANISMS FOR IMPACTS ON SOCIETY**

| Indicator | Disclosure Description   | Report Section | Report Page / External Document Link | Disclosure   |
|-----------|--|----------------|--------------------------------------|--|
| G4-DMA    | Generic Disclosures on Management Approach   |                |                                      |  |
| G4-SO11   | Number of grievances about impacts on society filed, addressed, and resolved through formal grievance mechanisms |                |                                      | <p>Northern Trust’s policy is to comply with all applicable laws and regulations in all countries where we operate.</p> <p>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:</p> <p><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>.</p> <p>Additionally, in the United States, Northern Trust maintains an Outstanding Community Reinvestment Act Rating.</p> |

SPECIFIC INDICATORS  
 CATEGORY: SOCIAL  
 SUB-CATEGORY: PRODUCT RESPONSIBILITY  
 ASPECT: CUSTOMER PRIVACY

| Indicator | Disclosure Description  | Report Section               | Report Page / External Document Link | Disclosure   |
|-----------|---|------------------------------|--------------------------------------|--|
| G4-DMA    | Generic Disclosures on Management Approach  |                              |                                      |  |
| G4-PR8    | Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data | CSR Annual Report, Integrity | P. 18                                | <p>Northern Trust's policy is to comply with all applicable laws and regulations in all countries where we operate.</p> <p>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:</p> <p><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>.</p> |



SPECIFIC INDICATORS  
 CATEGORY: SOCIAL  
 SUB-CATEGORY: PRODUCT RESPONSIBILITY  
 ASPECT: COMPLIANCE

| Indicator | Disclosure Description   | Report Section | Report Page / External Document Link | Disclosure   |
|-----------|--|----------------|--------------------------------------|--|
| G4-DMA    | Generic Disclosures on Management Approach   |                |                                      |  |
| G4-PR9    | Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services |                |                                      | <p>Northern Trust's policy is to comply with all applicable laws and regulations in all countries where we operate.</p> <p>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:</p> <p><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>.</p> |
| G4-FS6    | Percentage of the portfolio for business lines by specific region, size (e.g. Micro/SME/Large) and by sector                               |                |                                      | <p>Part I, Item 1 (p.1-14) of Northern Trust Corporation's 10K includes a description of our business and breakdown of assets by business unit.</p> <p>Part I, Item 1A (p. 12-27) of Northern Trust Corporation's 10K includes a description of risk factors.</p> <p>The filings can be found here:</p> <p><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></p>   |
| G4-FS11   | Percentage of assets subject to positive and negative environmental or social screening  | Expertise      | pps. 13                              | Northern Trust's ESG Assets Under Management comprised over 6.7 percent of total Assets Under Management for the firm.   |