

Corporate Social Responsibility Annual Report
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Standard Disclosure	Report Section	Report Page External Document Link	Disclosure	External Assurance
GENERAL STANDARD DISCLOSURES				
<u>G4-1</u>	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	P. 1	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-2</u>	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 Basis of Report Progress on Long-term CSR Goals	P. 1, 3, 8-9	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
ORGANIZATIONAL PROFILE				
<u>G4-3</u>	Report the name of the organization.	2014 Annual Report to Shareholders	2014 Annual Report to Shareholders (https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2014.pdf?bc=24069351) P. 1	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-4</u>	Report the primary brands, products, and services.	2014 Annual Report to Shareholders	(https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2014.pdf?bc=24069351) P. 1	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-5</u>	Report the location of the organization's headquarters.	2014 Annual Report to Shareholders	(https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2014.pdf?bc=24069351) P. 1	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-6</u>	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.	2014 Annual Report to Shareholders	(https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2014.pdf?bc=24069351) P. 1	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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Standard Disclosure		Report Section	Report Page External Document Link	Disclosure	External Assurance
<u>G4-7</u>	Report the nature of ownership and legal form.	2014 Annual Report to Shareholders	(https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2014.pdf?bc=24069351) P. 1		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-8</u>	Report the markets served (including geographic breakdown, sectors served, and types of customers and beneficiaries).	2014 Annual Report to Shareholders	(https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2014.pdf?bc=24069351) P. 1		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-9</u>	Report the scale of the organization, including: Total number of employees Total number of operations Net sales (for private sector organizations) or net revenues (for public sector organizations) Total capitalization broken down in terms of debt and equity (for private sector organizations) Quantity of products or services provided	2014 Annual Report to Shareholders	(https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2014.pdf?bc=24069351) P. 1		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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<u>G4-10</u>	<p>a. Report the total number of employees by employment contract and gender.</p> <p>b. Report the total number of permanent employees by employment type and gender.</p> <p>c. Report the total workforce by employees and supervised workers and by gender.</p> <p>d. Report the total workforce by region and gender.</p> <p>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.</p> <p>f. Report any significant variations in employment numbers (such as seasonal variations in employment in the tourism or agricultural industries).</p>	CSR Annual Report, Culture	P. 23		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-11</u>	Report the percentage of total employees covered by collective bargaining agreements.	CSR Annual Report / Culture	P. 22	There are no Northern Trust employees are covered by collective bargaining agreements.	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report



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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>	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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Standard Disclosure	Report Section	Report Page External Document Link	Disclosure	External Assurance
<u>G4-13</u> Report any significant changes during the reporting period regarding the organization's size, structure, ownership, or its supply chain, including: Changes in the location of, or changes in, operations, including facility openings, closings, and expansions Changes in the share capital structure and other capital formation, maintenance, and alteration operations (for private sector organizations) Changes in the location of suppliers, the structure of the supply chain, or in relationships with suppliers, including selection and termination	CSR Annual Report, Basis of Report	P. 3		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-14</u> Report whether and how the precautionary approach or principle is addressed by the organization.	2015 Northern Trust Proxy Statement	https://www.northerntrust.com/documents/annual-reports/northern-trust-proxy-statement-2015.pdf?bc=24069363		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-15</u> 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. 6		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-16</u> List memberships of associations (such as industry associations) and national or international advocacy organizations in which the organization: Holds a position on the governance body Participates in projects or committees Provides substantive funding beyond routine membership dues Views membership as strategic	CSR Annual Report, Selected Memberships and Associations	P. 6		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

IDENTIFIED MATERIAL ASPECTS AND BOUNDARIES

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Standard Disclosure		Report Section	Report Page External Document Link	Disclosure	External Assurance
<u>G4-17</u>	a. List all entities included in the organization's consolidated financial statements or equivalent documents. b. Report whether any entity included in the organization's consolidated financial statements or equivalent documents is not covered by the report.	2014 Annual Report to Shareholders	https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2014		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-18</u>	a. Explain the process for defining the report content and the Aspect Boundaries. b. Explain how the organization has implemented the Reporting Principles for Defining Report Content.	CSR Annual Report, Letter from Chairman and CEO, Rick Waddell and Head of CSR and Global Diversity & Inclusion, Connie Lindsey	P. 1, 3, 12		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-19</u>	List all the material Aspects identified in the process for defining report content. Pp	CSR Annual Report, Basis of Report	P. 3		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-20</u>	a. For each material Aspect, report the Aspect Boundary within the organization, as follows: Report whether the Aspect is material within the organization 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: —The list of entities or groups of entities included in G4-17 for which the Aspect is not material or —The list of entities or groups of entities included in G4-17 for which the Aspects is material Report any specific limitation regarding the Aspect Boundary within the organization	CSR Annual Report, Basis of Report	P. 3		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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Standard Disclosure		Report Section	Report Page External Document Link	Disclosure	External Assurance
G4-21	a. For each material Aspect, report the Aspect Boundary outside the organization, as follows: Report whether the Aspect is material outside of the organization 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 Report any specific limitation regarding the Aspect Boundary outside the organization	CSR Annual Report, Basis of Report	P. 3		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
G4-22	a. 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. 3		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
G4-23	Report significant changes from previous reporting periods in the Scope and Aspect Boundaries.	CSR Annual Report, Basis of Report	P. 3		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
STAKEHOLDER ENGAGEMENT					
G4-24	Provide a list of stakeholder groups engaged by the organization.	CSR Annual Report, Infographic	P. 11		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
G4-25	Report the basis for identification and selection of stakeholders with whom to engage. P	CSR Annual Report, Infographic	P. 12		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
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, Infographic	P. 12		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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<u>G4-27</u>	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. 3, 12		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
REPORT PROFILE					
<u>G4-28</u>	Reporting period (such as fiscal or calendar year) for information provided.	CSR Annual Report, Basis of Report	P. 3		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-29</u>	Date of most recent previous report	CSR Annual Report, Basis of Report	P. 3		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-30</u>	Reporting cycle (such as annual, biennial).	CSR Annual Report, Basis of Report	P. 3		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-31</u>	Provide the contact point for questions regarding the report or its contents.	CSR Annual Report, Basis of Report	P. 3		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-32</u>	a. Report the 'in accordance' option the organization has chosen. b. Report the GRI Content Index for the chosen option (see tables below). 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.	CSR Annual Report, Basis of Report	P. 3		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report



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<p><u>G4-33</u></p> <p>a. Report the organization's policy and current practice with regard to seeking external assurance for the report.</p> <p>b. If not included in the assurance report accompanying the sustainability report, report the scope and basis of any external assurance provided.</p> <p>c. Report the relationship between the organization and the assurance providers.</p> <p>d. Report whether the highest governance body or senior executives are involved in seeking assurance for the organization's sustainability report.</p>	<p>CSR Annual Report, Basis of Report</p>	<p>P. 3</p>		<p>Yes, CSR Annual Report p. 2 Independent Accounts' Review Report</p>

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GOVERNANCE				
<u>G4-34</u>	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 Business Strategy Committee Charter https://www.northerntrust.com/documents/governance/charter-business-strategy.pdf?bc=23988584		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-35</u>	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 Business Strategy Committee Charter https://www.northerntrust.com/documents/governance/charter-business-strategy.pdf?bc=2398858		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-36</u>	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.	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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Standard Disclosure		Report Section	Report Page External Document Link	Disclosure	External Assurance
<u>G4-37</u>	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.		https://www.northerntrust.com/about-us/investor-relations/corporate-governance		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-38</u>	Report the composition of the highest governance body and its committees by: Executive or non-executive Independence Tenure on the governance body Number of each individual's other significant positions and commitments, and the nature of the commitments Gender Membership of under-represented social groups Competences relating to economic, environmental and social impacts Stakeholder representation	2015 Northern Trust Proxy Statement	https://www.northerntrust.com/documents/annual-reports/northern-trust-proxy		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report



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<p><u>G4-39</u></p>	<p>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>		<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>	<p>Yes, CSR Annual Report p. 2 Independent Accounts’ Review Report</p>

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Standard Disclosure	Report Section	Report Page External Document Link	Disclosure	External Assurance
G4-40 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: Whether and how diversity is considered Whether and how independence is considered Whether and how expertise and experience relating to economic, environmental and social topics are considered Whether and how stakeholders (including shareholders) are involved	Corporate Governance Guidelines	https://www.northerntrust.com/documents/governance/corporate-governance-guidelines.pdf?bc=23956853		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
G4-41 Report processes for the highest governance body to ensure conflicts of interest are avoided and managed. Report whether conflicts of interest are disclosed to stakeholders, including, as a minimum: Cross-board membership Cross-shareholding with suppliers and other stakeholders Existence of controlling shareholder Related party disclosures	Code of Business Conduct		https://www.northerntrust.com/documents/governance/code-of-business-conduct	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
G4-42 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.	Northern Trust Board of Directors, Business Strategy Committee Charter Northern Trust Corporate Social Responsibility Governance Page		https://www.northerntrust.com/documents/governance/charter-business-strategy	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
G4-43 Report the measures taken to develop and enhance the highest governance body's collective knowledge of economic, environmental and social topics.	Northern Trust Board of Directors, Business Strategy Committee Charter Northern Trust Corporate Social Responsibility Governance Page		https://www.northerntrust.com/documents/governance/charter-business-strategy	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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<u>G4-44</u>	<p>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.</p> <p>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.</p>	<p>Northern Trust Board of Directors, Business Strategy Committee Charter</p> <p>Northern Trust Corporate Social Responsibility Governance Page</p>	https://www.northerntrust.com/documents/governance/charter-business-strateg		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-45</u>	<p>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.</p> <p>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.</p>	<p>Northern Trust Board of Directors, Business Strategy Committee Charter</p> <p>Northern Trust Corporate Social Responsibility Governance Page</p>	https://www.northerntrust.com/documents/governance/charter-business-strateg		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-46</u>	Report the highest governance body's role in reviewing the effectiveness of the organization's risk management processes for economic, environmental and social topics.	<p>Northern Trust Board of Directors, Business Strategy Committee Charter</p> <p>Northern Trust Corporate Social Responsibility Governance Page</p>	https://www.northerntrust.com/documents/governance/charter-business-strateg		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-47</u>	Report the frequency of the highest governance body's review of economic, environmental and social impacts, risks, and opportunities.	<p>Northern Trust Board of Directors, Business Strategy Committee Charter</p> <p>Northern Trust Corporate Social Responsibility Governance Page</p>	https://www.northerntrust.com/documents/governance/charter-business-strateg		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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<u>G4-48</u> 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.	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-49</u> Report the process for communicating critical concerns to the highest governance body.	Corporate Governance Guidelines	https://www.northerntrust.com/about-us/investor-relations/corporate-governance		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-51</u> a. Report the remuneration policies for the highest governance body and senior executives for the below types of remuneration: Fixed pay and variable pay: —Performance-based pay —Equity-based pay —Bonuses —Deferred or vested shares Sign-on bonuses or recruitment incentive payments Termination payments Clawbacks Retirement benefits, including the difference between benefit schemes and contribution rates for the highest governance body, senior executives, and all other employees b. Report how performance criteria in the remuneration policy relate to the highest governance body's and senior executives' economic, environmental and social objectives.	Compensation and Benefits Committee Charter 2015 Northern Trust Proxy Statement	https://www.northerntrust.com/documents/governance/charter-compensation-benefits.pdf?bc=23956856 https://www.northerntrust.com/documents/annual-reports/northern-trust-proxy-statement-2015.pdf?bc=23956730		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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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 Compensation and Benefits Committee Charter	https://www.northerntrust.com/about-us/investor-relations/corporate-governance/board-of-directors/contact https://www.northerntrust.com/documents/governance/charter-compensation-benefits.pdf?bc=24132456		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
ETHICS AND INTEGRITY					
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	https://www.northerntrust.com/documents/governance/code-of-business-conduct		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
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	https://www.northerntrust.com/documents/governance/code-of-business-conduct-ethics.pdf?bc=23956853		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
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	https://www.northerntrust.com/documents/governance/code-of-business-conduct-ethics.pdf?bc=23956853		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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SPECIFIC STANDARD DISCLOSURES				
CATEGORY: ECONOMIC				
ASPECT: ECONOMIC PERFORMANCE				
G4-DMA	Generic Disclosures on Management Approach	<p>At Northern Trust we use various methods to actively engage our internal and external stakeholders. In 2013, our CSR practice identified non-financial aspects of most significance for our firm. One of the outcomes of the project was the identification of 10 non-financial aspects of most significance for Northern Trust.</p> <p>We engage with our stakeholders frequently and in ways that are most relevant to their particular requirements and needs. The aspects identified as a result of the project is one of the many tools our team uses to more appropriately target resources, research and refine our outcomes- based approach to our CSR strategy. In addition, while environmental sustainability is not listed among the non-financial aspects of most significance identified by our stakeholder engagement work, we recognize and embrace the view that the health and wellbeing of our planet is tied to the long-term viability of our business, our communities and the interests of our key stakeholders. We will continue to make appropriate investments that support our commitment to being good stewards of these resources.</p>		
<u>G4-EC1</u>	Direct economic value generated and distributed	CSR Annual Report, Infographic	P. 20	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-EC2</u>	Financial implications and other risks and opportunities for the organization's activities due to climate change		Link to 2015 CDP Submission.	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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<u>G4-EC3</u>	Coverage of the organization's defined benefit plan obligations	2014 Northern Trust Annual Report	https://www.northerntrust.com/documents/annual-reports/northern-trust-annual-report-2014		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-EC4</u>	Financial assistance received from government			Northern Trust did not receive financial assistance from the government in 2014.	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
ASPECT: MARKET PRESENCE					
G4-DMA	Generic Disclosures on Management Approach	CSR Annual Report / Culture	P. 23		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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<u>G4-EC6</u>	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</p> <p>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>	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
ASPECT: INDIRECT ECONOMIC IMPACTS					
G4-DMA	Generic Disclosures on Management Approach	CSR Annual Report / Culture	P. 21		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-EC7</u>	Development and impact of infrastructure investments and services supported	CSR Annual Report, Infographic	P. 20		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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<u>G4-EC8</u>	Significant indirect economic impacts, including the extent of impacts	CSR Annual Report, Infographic	P. 20		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
CATEGORY: ENVIRONMENTAL					
ASPECT: ENERGY					
G4-DMA	Generic Disclosures on Management Approach	CSR Annual Report / Environmental Sustainability	P. 26		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-EN3</u>	Energy consumption within the organization		Link to 2015 CDP Submission.		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
ASPECT: EMISSIONS					
G4-DMA	Generic Disclosures on Management Approach	CSR Annual Report, Environmental Sustainability	P. 26		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-EN15</u>	Direct greenhouse gas (GHG) emissions (Scope 1)	Supplemental GHG Emissions Statement	P. 29		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-EN16</u>	Energy indirect greenhouse gas (GHG) emissions (Scope 2)	Supplemental GHG Emissions Statement	P. 29		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-EN17</u>	Other indirect greenhouse gas (GHG) emissions (Scope 3)	Supplemental GHG Emissions Statement	P. 29		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-EN18</u>	Greenhouse gas (GHG) emissions intensity	Supplemental GHG Emissions Statement			Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-EN19</u>	Reduction of greenhouse gas (GHG) emissions	Supplemental GHG Emissions Statement			Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
ASPECT: COMPLIANCE					

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G4-DMA	Generic Disclosures on Management Approach	CSR Annual Report, Environmental Sustainability	P. 26		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-EN29</u>	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.	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
ASPECT: ENVIRONMENTAL GRIEVANCE MECHANISMS					
G4-DMA	Generic Disclosures on Management Approach	CSR Annual Report, Environmental Sustainability	P. 26		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-EN34</u>	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.	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
CATEGORY: SOCIAL					
SUB-CATEGORY: LABOR PRACTICES AND DECENT WORK					
ASPECT: EMPLOYMENT					
G4-DMA	Generic Disclosures on Management Approach	CSR Annual Report, Culture	P. 22		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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Standard Disclosure		Report Section	Report Page External Document Link	Disclosure	External Assurance
<u>G4-LA2</u>	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation			- 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 - available to partners who are scheduled to work 20 or more hours per week	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
ASPECT: TRAINING AND EDUCATION					
G4-DMA	Generic Disclosures on Management Approach	CSR Annual Report / Culture	P. 22		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-LA9</u>	Average hours of training per year per employee by gender, and by employee category			Globally, all partners completed, on average, 22 hours of training in 2014. All employees regardless of gender and/or job category have access to training.	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-LA11</u>	Percentage of employees receiving regular performance and career development reviews, by gender and by employee category			97% of all employees had a performance document completed in 2014 regardless of gender. The completion rate for individual contributors was 98.9% The completion rate for managers was 89%	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
ASPECT: DIVERSITY AND EQUAL OPPORTUNITY					
G4-DMA	Generic Disclosures on Management Approach	CSR Annual Report / Culture	P. 22		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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Standard Disclosure		Report Section	Report Page External Document Link	Disclosure	External Assurance
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	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. Demographic information on our Board of Directors can be found at: https://www.northerntrust.com/documents/annual-reports/northern-trust-proxy-statement-2015.pdf?bc=24119948		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
ASPECT: LABOR PRACTICES GRIEVANCE MECHANISMS					
G4-DMA	Generic Disclosures on Management Approach	CSR Annual Report / Culture	P. 22		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
G4-LA16	Number of grievances about labor practices 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 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: https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings .	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
SUB-CATEGORY: HUMAN RIGHTS					
ASPECT: INVESTMENT					
G4-DMA	Generic Disclosures on Management Approach	CSR Annual Report / Culture	P. 22		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report



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Standard Disclosure		Report Section	Report Page External Document Link	Disclosure	External Assurance
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. 22-23	Within 60 days of hire, employees must complete Diversity and Inclusion training. In 2014, the completion rate was 100 percent.	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
ASPECT: NON-DISCRIMINATION					
G4-DMA	Generic Disclosures on Management Approach	CSR Annual Report / Culture	P. 22		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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Standard Disclosure		Report Section	Report Page External Document Link	Disclosure	External Assurance
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>https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings</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>	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
ASPECT: FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING					
G4-DMA	Generic Disclosures on Management Approach	CSR Annual Report / Culture	P. 22		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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Standard Disclosure		Report Section	Report Page External Document Link	Disclosure	External Assurance
<u>G4-HR4</u>	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> <p>Evidence of the capability to provide the highest quality goods and/or services</p> <p>Commitment to mutually agreed service standards</p> <p>Sufficient financial resources to be a reliable and consistent provider</p> <p>Adherence to the law and regulations in all regards</p> <p>Compliance with Northern Trust's centralized procurement program and its standards</p>	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
SUB-CATEGORY: SOCIETY					
ASPECT: LOCAL COMMUNITIES					
G4-DMA	Generic Disclosures on Management Approach	CSR Annual Report, Culture	P. 21		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-SO1</u>	Percentage of operations with implemented local community engagement, impact assessments, and development programs	CSR Annual Report, Culture	P. 22		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
ASPECT: ANTI-CORRUPTION					
G4-DMA	Generic Disclosures on Management Approach	Northern Trust Code of Business Conduct and Ethics	https://www.northerntrust.com/documents/governance/code-of-business-conduct-ethics.pdf?bc=23956853		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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Standard Disclosure		Report Section	Report Page External Document Link	Disclosure	External Assurance
<u>G4-SO3</u>	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>https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings.</p>	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
ASPECT: PUBLIC POLICY					
G4-DMA	Generic Disclosures on Management Approach	Northern Trust Statement Regarding Government Relations and Political Contributions	https://www.northerntrust.com/about-us/corporate-social-responsibility/government-relations-political-contributions		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
<u>G4-SO6</u>	Total value of political contributions by country and recipient/beneficiary		<p>Northern Trust Corporation Political Action Committee http://query.nictusa.com/cgi-bin/com_detail/C00024935/</p> <p>Northern Trust Corporation Federal Political Action Committee http://query.nictusa.com/cgi-bin/com_detail/C00515148/</p>		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
ASPECT: ANTI-COMPETITIVE BEHAVIOR					
G4-DMA	Generic Disclosures on Management Approach	Northern Trust Code of Business Conduct and Ethics	https://www.northerntrust.com/documents/governance/code-of-business-conduct-ethics.pdf?bc=23956853		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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Standard Disclosure		Report Section	Report Page External Document Link	Disclosure	External Assurance
<u>G4-SO7</u>	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>https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings.</p>	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
ASPECT: COMPLIANCE					
G4-DMA	Generic Disclosures on Management Approach	Northern Trust Code of Business Conduct and Ethics	https://www.northerntrust.com/documents/governance/code-of-business-conduct-ethics.pdf?bc=23956853		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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Standard Disclosure		Report Section	Report Page External Document Link	Disclosure	External Assurance
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>https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings.</p>	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
ASPECT: GRIEVANCE MECHANISMS FOR IMPACTS ON SOCIETY					
G4-DMA	Generic Disclosures on Management Approach	Northern Trust Code of Business Conduct and Ethics	https://www.northerntrust.com/documents/governance/code-of-business-conduct-ethics.pdf?bc=23956853	Additionally, in the United States, Northern Trust maintains an Outstanding Community Reinvestment Act Rating.	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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Standard Disclosure		Report Section	Report Page External Document Link	Disclosure	External Assurance
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>https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings.</p> <p>Additionally, in the United States, Northern Trust maintains an Outstanding Community Reinvestment Act Rating.</p>	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
SUB-CATEGORY: PRODUCT RESPONSIBILITY					
ASPECT: CUSTOMER PRIVACY					
G4-DMA	Generic Disclosures on Management Approach	CSR Annual Report, Integrity	P. 18		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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Standard Disclosure		Report Section	Report Page External Document Link	Disclosure	External Assurance
<u>G4-PR8</u>	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>https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings.</p>	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
ASPECT: COMPLIANCE					
G4-DMA	Generic Disclosures on Management Approach	Northern Trust Code of Business Conduct and Ethics	https://www.northerntrust.com/documents/governance/code-of-business-conduct-ethics.pdf?bc=23956853		Yes, CSR Annual Report p. 2 Independent Accounts' Review Report

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Standard Disclosure		Report Section	Report Page External Document Link	Disclosure	External Assurance
<u>G4-PR9</u>	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>https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings.</p>	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
Financial Services Sector Disclosure					
ASPECT: PRODUCT PORTFOLIO					
<u>G4-DMA</u>	Generic Disclosures on Management Approach	CSR Annual Report / Expertise	P. 14		
<u>G4-FS6</u>	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: https://www.northerntrust.com/about-us/investor-relations/financial-information/sec-regulatory-filings</p>	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report
ASPECT: ACTIVE OWNERSHIP					

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Standard Disclosure		Report Section	Report Page External Document Link	Disclosure	External Assurance
G4-DMA	Generic Disclosures on Management Approach	CSR Annual Report / Expertise	P. 14		
G4-FS11	Percentage of assets subject to positive and negative environmental or social screening	Expertise	pps. 14-15	Northern Trust's ESG Assets Under Management comprise 6.7 percent of total Assets Under Management for the firm.	Yes, CSR Annual Report p. 2 Independent Accounts' Review Report