

## C0. Introduction

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### C0.1

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#### **(C0.1) Give a general description and introduction to your organization.**

At [Ameriprise Financial](#), we have been helping people feel confident about their financial future for more than 125 years. With extensive advisory, asset management and insurance capabilities and a nationwide network of more than 10,000 financial advisors, we have the strength and expertise to serve the full range of individual and institutional investors' financial needs. Our diversified business is built on long-term relationships and centered on advice.

- We are a leading wealth manager and a longstanding leader in financial planning and advice in the U.S., serving more than 2 million individual, small business and institutional clients.
- We are a global asset manager investing on behalf of individuals and some of the most sophisticated institutional investors in the world.
- Our insurance and annuity businesses are differentiated and help meet clients' retirement income and protection needs.
- And our bank is a growing capability in our wealth management business.

Given our extensive capabilities, distribution reach and leadership positions, we engage with multiple stakeholders on ESG topics, including those related to climate change. These stakeholders include Ameriprise shareholders, investors, research organizations and others who are increasingly seeking to better understand performance factors that underpin long-term business success and sustainability. While each of our businesses is managing climate change in a way that reflects their unique market and regulatory environments, overall, Ameriprise considers climate change to be a long-term strategic risk and governs it within our enterprise risk management process.

In terms of emissions, like other financial services firms, Ameriprise is a low direct greenhouse gas (GHG) emitter. The main contributor to these emissions is our corporate real estate. We incorporate responsible environmental practices in the management of our facilities and have earned recognition at many locations for our energy efficiency. We will continue to manage our corporate footprint strategically to support business growth, improve efficiency, maximize resources and reduce emissions. That work is ongoing, and we approach it as part of a global real estate function.

Importantly, we have been evolving our approach to climate change over the past several years and benefit from the extensive Responsible Investment capabilities at Columbia Threadneedle, the asset management business of Ameriprise. As part of that work, we have been enhancing how we leverage the knowledge and perspective across our multiple businesses as we consider next steps in a rapidly changing operating environment. We would highlight the following enhancements:

- Building on the work at Columbia Threadneedle where we have calculated a UK carbon footprint for years, Ameriprise is now able to report our greenhouse gas emissions associated with our global footprint, understanding the ongoing challenges of securing the necessary data. Previously, we only had the ability to report our Scope 1 and 2 emissions associated with our Minneapolis campus.
- Within wealth management, we continue to develop our ESG capabilities and offer a broad range of products and services to our advisors and clients as they consider the impact of climate change on their investments.
- As part of Ameriprise, Columbia Threadneedle in 2021 joined the Net Zero Asset Managers initiative, a group of asset managers committed to an ambition to reach net zero emissions by 2050 or sooner across all assets under management. Columbia Threadneedle is also a signatory to Climate Action 100+ (CA100+), a collaborative program seeking to ensure that the world's largest corporate greenhouse gas emitters take necessary action to combat climate change. Columbia Threadneedle will issue an initial TCFD report later in 2022.
- Our acquisition in November 2021 of BMO Financial Group's EMEA asset management business (BMO GAM EMEA) added complementary strengths to form a differentiated RI capability based on creating value through research intensity, driving real-world change through active ownership and partnering with clients to deliver innovative RI solutions.
- RiverSource Life benefits from Columbia Threadneedle's RI capabilities in the management of the owned asset portfolios and has been evolving its approach to climate risk within our enterprise risk management function.
- And, we are growing Ameriprise Bank, FSB within Wealth Management. Like RiverSource, the Bank benefits from Columbia Threadneedle's management of the bank portfolio, including in asset classes where there is data available to inform RI decisions.

As you will see in our response to this survey, our approach to climate change has evolved over time. Importantly, we will continue to advance our capabilities pragmatically, ensuring we make informed decisions and execute our strategy thoughtfully, balancing the needs of all our stakeholders.

### C0.2

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**(C0.2) State the start and end date of the year for which you are reporting data.**

	Start date	End date	Indicate if you are providing emissions data for past reporting years	Select the number of past reporting years you will be providing emissions data for
Reporting year	January 1 2021	December 31 2021	Yes	2 years

**C0.3**

**(C0.3) Select the countries/areas in which you operate.**

Australia  
Austria  
Chile  
China  
Denmark  
France  
Germany  
India  
Italy  
Luxembourg  
Netherlands  
Portugal  
Republic of Korea  
Singapore  
Spain  
Sweden  
Switzerland  
United Arab Emirates  
United Kingdom of Great Britain and Northern Ireland  
United States of America

**C0.4**

**(C0.4) Select the currency used for all financial information disclosed throughout your response.**

USD

**C0.5**

**(C0.5) Select the option that describes the reporting boundary for which climate-related impacts on your business are being reported. Note that this option should align with your chosen approach for consolidating your GHG inventory.**

Operational control

**C-FS0.7**

**(C-FS0.7) Which activities does your organization undertake, and which industry sectors does your organization lend to, invest in, and/or insure?**

	Does your organization undertake this activity?	Insurance types underwritten	Industry sectors your organization lends to, invests in, and/or insures
Banking (Bank)	Yes	<Not Applicable>	Exposed to all broad market sectors
Investing (Asset manager)	Yes	<Not Applicable>	Exposed to all broad market sectors
Investing (Asset owner)	Yes	<Not Applicable>	Exposed to all broad market sectors
Insurance underwriting (Insurance company)	Yes	Life and/or Health	<Not Applicable>

**C0.8**

**(C0.8) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?**

Indicate whether you are able to provide a unique identifier for your organization	Provide your unique identifier
Yes, a Ticker symbol	AMP
Yes, an ISIN code	US03076C1062
Yes, a SEDOL code	BYZHDR1
Yes, a CUSIP number	03076C106

C1. Governance

C1.1

(C1.1) Is there board-level oversight of climate-related issues within your organization?

Yes

C1.1a

(C1.1a) Identify the position(s) (do not include any names) of the individual(s) on the board with responsibility for climate-related issues.

Position of individual(s)	Please explain
Board-level committee	The Nominating and Governance Committee of the Ameriprise Financial Board of Directors oversees the firm's enterprise-level corporate social responsibility (CSR) efforts. The Committee reviews and discusses with senior management the content of the Company's annual CSR report and any proposed material revisions to the report, as well as shareholder feedback, the evolving practices in the financial services industry in the United States, and the company's related policies and reporting metrics. Our 2022 Responsible Business Report includes information on our climate positioning and risk management processes and is available at <a href="https://www.ameriprise.com/binaries/content/assets/ampcom/2022-responsible-business-report.pdf">https://www.ameriprise.com/binaries/content/assets/ampcom/2022-responsible-business-report.pdf</a> Our approach to climate and consideration as a long-term strategic risk also ensures that climate change is incorporated within overall risk discussion and oversight.
Chief Executive Officer (CEO)	Our chairman and CEO leads the company's Executive Leadership Team Corporate Social Responsibility Steering Committee (ELT CSR SteerCo). The ELT CSR SteerCo meets quarterly to review CSR initiatives and priorities and make decisions related to CSR programs and evolution. This includes our climate-related strategy. In consultation with the ELT CSR SteerCo, our Chief Risk Officer and the Corporate Social Responsibility Working Group (CSR Working Group), the CEO helps drive climate positioning and related risk management processes. CSR Working Group membership includes senior leaders from Corporate Communications, Community Relations, Human Resources, Investor Relations, Real Estate, Responsible Investment at Columbia Threadneedle, Risk Management, and our General Counsel's Organization, including our Corporate Secretary. Ultimately, decisions about how the company will continue to evolve our climate strategy, actions and disclosures, are made by the CEO, Chief Risk Officer and members of the Executive Leadership Team.

C1.1b

(C1.1b) Provide further details on the board's oversight of climate-related issues.

Frequency with which climate-related issues are a scheduled agenda item	Governance mechanisms into which climate-related issues are integrated	Scope of board-level oversight	Please explain
Scheduled – some meetings	<ul style="list-style-type: none"> <li>Reviewing and guiding strategy</li> <li>Reviewing and guiding major plans of action</li> <li>Reviewing and guiding risk management policies</li> <li>Reviewing and guiding business plans</li> <li>Overseeing major capital expenditures, acquisitions and divestitures</li> <li>Other, please specify</li> </ul>	Climate-related risks and opportunities to our own operations The impact of our own operations on the climate	The Board of Directors reviews Corporate Social Responsibility (CSR) initiatives, programs, performance and strategy at Ameriprise. The Nominating and Governance Committee of the Ameriprise Board oversees our CSR efforts, including our climate-related initiatives. For example, at the January 2022 meeting, the committee reviewed the Ameriprise Responsible Business Report, which includes our climate-related strategy and work. The Lead Independent Director also participates on certain investor calls that address climate change risk management and disclosures. In addition, the Audit & Risk Committee oversees all risk management activities, which include the company's determination of climate as a long-term strategic risk. Management regularly updates the Board on the regulatory environment and emerging risks. The Board discusses with management, the general auditor and independent auditors the company's enterprise-wide risk assessment and risk management processes, including: <ul style="list-style-type: none"> <li>• Prevailing material risks and exposures</li> <li>• Actions being taken to mitigate these risks</li> <li>• The design and effectiveness of our processes and controls in light of evolving market, business, regulatory and other conditions.</li> </ul>

C1.1d

(C1.1d) Does your organization have at least one board member with competence on climate-related issues?

	Board member(s) have competence on climate-related issues	Criteria used to assess competence of board member(s) on climate-related issues	Primary reason for no board-level competence on climate-related issues	Explain why your organization does not have at least one board member with competence on climate-related issues and any plans to address board-level competence in the future
Row 1	Not assessed	<Not Applicable>	<Not Applicable>	<Not Applicable>

C1.2

**(C1.2) Provide the highest management-level position(s) or committee(s) with responsibility for climate-related issues.**

Name of the position(s) and/or committee(s)	Reporting line	Responsibility	Coverage of responsibility	Frequency of reporting to the board on climate-related issues
Chief Executive Officer (CEO)	Reports to the board directly	Assessing climate-related risks and opportunities	Risks and opportunities related to our investing activities Risks and opportunities related to our insurance underwriting activities Risks and opportunities related to our own operations	Annually
Chief Risks Officer (CRO)	CEO reporting line	Assessing climate-related risks and opportunities	Risks and opportunities related to our own operations	As important matters arise
Other, please specify (Vice President, Global Real Estate)	Finance - CFO reporting line	Both assessing and managing climate-related risks and opportunities	Risks and opportunities related to our own operations	Not reported to the board
Chief Investment Officer (CIO)	Investment - CIO reporting line	Assessing climate-related risks and opportunities	Risks and opportunities related to our investing activities	Not reported to the board
Other, please specify (Columbia Threadneedle Responsible Investment leadership)	Investment - CIO reporting line	Both assessing and managing climate-related risks and opportunities	Risks and opportunities related to our investing activities	Not reported to the board
Facility manager	Finance - CFO reporting line	Managing climate-related risks and opportunities	Risks and opportunities related to our own operations	Not reported to the board
Corporate responsibility committee	Other, please specify (Ameriprise Corporate Social Responsibility Working Group)	Both assessing and managing climate-related risks and opportunities	Risks and opportunities related to our investing activities Risks and opportunities related to our insurance underwriting activities Risks and opportunities related to our own operations	Not reported to the board
Other, please specify (RiverSource Life Risk Management)	Other, please specify (Reports to head of RiverSource Life subsidiary)	Assessing climate-related risks and opportunities	Risks and opportunities related to our insurance underwriting activities	Not reported to the board
Other, please specify (Executive Leadership Team Corporate Social Responsibility Steering Committee)	CEO reporting line	Both assessing and managing climate-related risks and opportunities	Risks and opportunities related to our investing activities Risks and opportunities related to our insurance underwriting activities Risks and opportunities related to our own operations	Annually

C1.3

**(C1.3) Do you provide incentives for the management of climate-related issues, including the attainment of targets?**

	Provide incentives for the management of climate-related issues	Comment
Row 1	Yes	Non-monetary recognition relates to our facilities team and are associated with energy efficiency projects, as detailed below.

C1.3a

**(C1.3a) Provide further details on the incentives provided for the management of climate-related issues (do not include the names of individuals).**

Entitled to incentive	Type of incentive	Activity incentivized	Comment
Facilities manager	Non-monetary reward	Energy reduction project	Our real estate team receives recognition for energy reduction initiatives in performance reviews.
Please select	Please select	Please select	

C-FS1.4

**(C-FS1.4) Does your organization offer its employees an employment-based retirement scheme that incorporates ESG criteria, including climate change?**

	Employment-based retirement scheme that incorporates ESG criteria, including climate change	Describe how funds within the retirement scheme are selected and how your organization ensures that ESG criteria are incorporated	Provide reasons for not incorporating ESG criteria into your organization's employment-based retirement scheme and your plans for the future
Row 1	Yes, as an investment option	A broad selection of ESG strategies are available through our self-directed brokerage option.	<Not Applicable>

C2. Risks and opportunities

C2.1

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**(C2.1) Does your organization have a process for identifying, assessing, and responding to climate-related risks and opportunities?**

Yes

**C2.1a**

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**(C2.1a) How does your organization define short-, medium- and long-term time horizons?**

	From (years)	To (years)	Comment
Short-term	0	1	Realized risks are also sometimes defined within a 0-18 month timeframe.
Medium-term	1	3	
Long-term	3	100	

**C2.1b**

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**(C2.1b) How does your organization define substantive financial or strategic impact on your business?**

Ameriprise considers climate as a long-term strategic risk within our Enterprise Risk Management (ERM) process. Within this framework, the Enterprise Risk Management Committee (ERMC) provides oversight for firm-wide strategic, financial and operational risk. While the enterprise considers climate a strategic risk, increased scrutiny may be taking place across individual business units based on their business and regulatory requirements.

Through our ERM process, the company evaluates substantive financial impacts on a quarterly basis. Each business unit identifies and assesses material operational risks as part of the RCSA process. We use a Red, Amber, Green (RAG) rating system to classify Risk Events (REVs) on a scale of very low to very high actual or potential impact. Each REV is assigned an impact rating based on the RAG status, and determined by the actual or potential financial, business, client, regulatory, and reputational impact. Business unit leads score each risk on three dimensions: probability of occurrence, financial impact and control environment.

Consideration of climate risk within the ERM process began in 2020 and continues to evolve over time.

**C2.2**

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**(C2.2) Describe your process(es) for identifying, assessing and responding to climate-related risks and opportunities.**

**Value chain stage(s) covered**

Direct operations  
Upstream

**Risk management process**

Integrated into multi-disciplinary company-wide risk management process

**Frequency of assessment**

Annually

**Time horizon(s) covered**

Medium-term

**Description of process**

At the enterprise level, Ameriprise considers climate risk to be a long-term strategic risk. The company reviews long-term strategic risks on an ongoing basis, and formally reviews them as part of our enterprise risk management process annually. In addition, the company reviews strategic risk and the actions to mitigate the potential impact of those risks as part of our long-range planning process. Our enterprise risk management process includes assessing, protecting against and mitigating the physical risks of catastrophic weather events affecting the company, our clients and our policyholders. And we are cognizant of the long-term transitional challenges and opportunities that reflect evolving consumer preferences and regulatory regimes. Overall, we approach climate issues as a wealth manager, global asset manager and insurer: • Within wealth management, we continue to develop our ESG capabilities and offer a broad range of products and services to our advisors and clients as they consider the impact of climate change on their investments. This includes expanded research, training and tools for advisors. • Our asset management business, Columbia Threadneedle, is a Responsible Investment leader, and our extensive fundamental research reflects our belief that prudent management of financial and ESG factors are important to a company's ability to create long-term, sustainable value. • Within our retirement and protection business, our efforts related to climate change strategy are both part of Ameriprise's engagement process, and as a responsible investor within life portfolios. Ameriprise, and its subsidiaries, Columbia Threadneedle and RiverSource Life, continue to evolve their climate approach and capabilities to manage risks and opportunities, as well as meet current and evolving regulatory requirements. We would also note the growth of Ameriprise Bank within our Wealth Management business.

**C2.2a**

**(C2.2a) Which risk types are considered in your organization's climate-related risk assessments?**

	Relevance & inclusion	Please explain
Current regulation	Relevant, always included	As a diversified financial services firm, our businesses are heavily regulated. Virtually all aspects of our business, including the activities of our parent company and our subsidiaries, are subject to various federal, state and international laws and regulations. Compliance with these applicable laws and regulations is time consuming and personnel-intensive, and we have invested and will continue to invest substantial resources to ensure compliance by our parent company and our subsidiaries, directors, officers, employees, registered representatives and agents.
Emerging regulation	Relevant, always included	Our businesses are regulated heavily, and changes to the laws and regulations applicable to our businesses, including those pertaining to climate, may have an adverse effect on our operations, reputation and financial condition. In addition, climate change regulation may affect the prospects of companies and other entities whose securities we hold, or our willingness to continue to hold their securities. Further, any future legislation or changes to the laws and regulations applicable to our businesses, as well as changes to the interpretation and enforcement of such laws and regulations, may affect our operations and financial condition. An example of emerging regulation is the SEC's proposed climate reporting rule.
Technology	Relevant, always included	Technology is a key component of our business, and any risk would be assessed against the ability to deliver the technology component of that particular area, including climate. As an example, physical risks related to technology infrastructure are considered annually when IT conducts a risk assessment, vertically and horizontally across the organization.
Legal	Relevant, always included	As a financial services firm, our operations are generally not subject to climate or environmentally related litigation claims. However, we are, and in the future may be, subject to legal and regulatory actions in the ordinary course of our operations, both domestically and internationally.
Market	Relevant, always included	Our financial condition and results of operations may be materially affected by market fluctuations and by economic and other factors, including climate. Such factors, which can be global, regional, national or local in nature, include: (i) the COVID-19 pandemic, or any variation thereof; (ii) political, social, economic and market conditions; (iii) the availability and cost of capital; (iv) the level and volatility of equity prices, commodity prices and interest rates, currency values and other market indices; (v) technological changes and events; (vi) U.S. and foreign government fiscal and tax policies; (vii) U.S. and foreign government ability, real or perceived, to avoid defaulting on government securities; (viii) the availability and cost of credit; (ix) the ongoing inflationary environment; (x) investor sentiment and confidence in the financial markets; (xi) terrorism and armed conflicts; and (xii) natural disasters such as weather catastrophes and widespread health emergencies. These factors could also impact client behavior. Market downturns, stagnation, and volatility may cause, and have caused, individual investors to limit or decrease their participation in global markets negatively impacting our retail business and/or our product sales. We monitor evolving industry trends to inform our business strategy and identify market risks, which may include changes in client demand. As ESG investment trends evolve, clients may be interested in allocating a higher percentage of their investments to Responsible Investment (RI)/Environmental, Social and Governance (ESG) strategies and solutions over time.
Reputation	Relevant, always included	A failure to protect our reputation could adversely affect our businesses. Our reputation is one of our most important assets. Our ability to attract and retain customers, investors, employees and advisors is highly dependent upon external perceptions of our company, as well as our culture that drives engagement. Climate change may also influence investor sentiment with respect to the Company and investments in our portfolio. It may also impact other counterparties, including reinsurers, and affect the value of investments, including real estate investments we hold or manage for others. To help mitigate reputational risks related to climate, our investors are increasingly monitoring opportunities and risks related to RI/ESG strategies, recognizing that the field is evolving to one that combines an expectation of improved performance related to sustainability factors and alignment with one's values. Additionally, Ameriprise maintains environmental transparency through its Responsible Business Report and participation in this survey.
Acute physical	Relevant, always included	Climate change is increasing the severity and frequency of weather-related catastrophes, which may adversely affect our investment portfolio or investor sentiment. The occurrence of natural disasters and catastrophes, including earthquakes, hurricanes, floods, tornadoes, fires, blackouts, severe winter weather, explosions, pandemic disease (such as COVID-19) and man-made disasters, including acts of terrorism, riots, civil unrest including large-scale protests, insurrections and military actions, could adversely affect our results of operations or financial condition. Such disasters and catastrophes may damage our facilities, preventing our service providers, employees and financial advisors from performing their roles, or otherwise disturbing our ordinary business operations and by impacting insurance claims, as described below. These impacts could be particularly severe to the extent they affect access to physical facilities, the physical well-being of large numbers of our employees, our computer-based data processing, transmission, storage and retrieval systems and destroy or release valuable data. Such disasters and catastrophes may also impact us indirectly by changing the condition and behaviors of our customers, business counterparties and regulators, as well as by causing declines or volatility in the economic and financial markets.
Chronic physical	Relevant, always included	Climate change is increasing the severity and frequency of weather-related catastrophes, or adversely affect our investment portfolio or investor sentiment. The potential effects of natural and man-made disasters and catastrophes on certain areas of our businesses include but are not limited to the following: (i) a catastrophic loss of life may materially increase the amount of or accelerate the timing in which benefits are paid under our insurance policies; (ii) an increase in claims and any resulting increase in claims reserves caused by a disaster may harm the financial condition of our reinsurers, thereby impacting the cost and availability of reinsurance and the probability of default on reinsurance recoveries; (iii) widespread unavailability of staff; and (iv) declines and volatility in the financial markets that may decrease the value of our assets under management and administration, which could harm our financial condition and reduce our management fees. Additionally, our real estate team monitors chronic shifts in climate that may affect the facilities in our operational footprint. For example, severe weather such as heat waves, winter weather or severe seasonal storms may impact our energy efficiency.

**C-FS2.2b**

**(C-FS2.2b) Do you assess your portfolio's exposure to climate-related risks and opportunities?**

	We assess the portfolio's exposure	Explain why your portfolio's exposure is not assessed and your plans to address this in the future
Banking (Bank)	No, and we do not plan to in the next two years	The vast majority of our Bank's investment portfolio is invested in structured assets, including mortgages. Columbia Threadneedle manages the portfolio and has extensive RI capabilities, including with regard to managing the risks and opportunities related to climate risk. However, there is a lack of reliable, consistent data available for these asset classes. As the market matures and relevant data capabilities develop further, we will continue to evaluate our ability to assess the portfolio's exposure.
Investing (Asset manager)	Yes	<Not Applicable>
Investing (Asset owner)	Yes	<Not Applicable>
Insurance underwriting (Insurance company)	No, and we do not plan to in the next two years	As a life insurer and annuity provider our underwriting is at the retail/client level, and therefore we don't incorporate climate risk at the policy level. However, we continue to advance our climate capabilities largely within our insurance investment portfolio and within our risk management approach.

**C-FS2.2c**

**(C-FS2.2c) Describe how you assess your portfolio's exposure to climate-related risks and opportunities.**

	Type of risk management process	Proportion of portfolio covered by risk management process	Type of assessment	Time horizon(s) covered	Tools and methods used	Provide the rationale for implementing this process to assess your portfolio's exposure to climate-related risks and opportunities
Banking (Bank)	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable >	<Not Applicable>	<Not Applicable>
Investing (Asset manager)	Integrated into multi-disciplinary company-wide risk management process	100	Qualitative and quantitative	Short-term Medium-term Long-term	Risk models Scenario analysis Stress tests Internal tools/methods Other, please specify (Aladdin / MSCI)	Given the number of portfolios we cover as a risk team, we start with quantitative screens to identify potential risks. We then incorporate qualitative data in our discussions with the portfolio managers. We're constantly looking to improve the process, just as we are also evolving how we look at RI and climate change within the firm overall. An advantage of using these methods is that we are able to assess the analysis that portfolio managers are doing, alongside an independent view. A disadvantage is we also utilize external data, and we know that some of this isn't always reliable. Following Columbia Threadneedle's adoption of a net zero goal, we are rolling out a Net Zero data tool, which will enhance our analysis by providing data on how well aligned our companies are to a net zero business strategy. So far we have methodologies covering equities, corporate bonds and direct real estate.
Investing (Asset owner)	Integrated into multi-disciplinary company-wide risk management process	45	Qualitative and quantitative	Short-term Medium-term Long-term	Risk models Scenario analysis Stress tests Internal tools/methods	Our research process incorporates ESG aspects as a means to enhance our view into strategic direction, capital allocation and culture that are critical in the underwriting of corporate management teams. We believe this provides us a holistic view of risk when considering, debating the risk/reward proposition of a security within the portfolio construction process. Specifically, the research team incorporates MSCI, Columbia Threadneedle's proprietary ratings and ESG material factors into its fundamental analysis. These ratings and key ESG material factors supplement analyst credit metric tables incorporated in company and industry thesis statements. The material factors and statistics presented in the tables include but are not limited to GHG emissions, biodiversity & land, health & safety exposure, water usage and ethics and fraud.
Insurance underwriting (Insurance company)	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable >	<Not Applicable>	<Not Applicable>

**C-FS2.2d**

**(C-FS2.2d) Does your organization consider climate-related information about your clients/investees as part of your due diligence and/or risk assessment process?**

	We consider climate-related information	Explain why you do not consider climate-related information and your plans to address this in the future
Banking (Bank)	No, and we do not plan to in the next two years	We do not have the necessary data to prioritize this.
Investing (Asset manager)	Yes	<Not Applicable>
Investing (Asset owner)	No, and we do not plan to in the next two years	We do not have the necessary data to prioritize this.
Insurance underwriting (Insurance company)	<Not Applicable>	<Not Applicable>

**C-FS2.2e**

**(C-FS2.2e) Indicate the climate-related information your organization considers about clients/investees as part of your due diligence and/or risk assessment process, and how this influences decision-making.**

**Portfolio**

Investing (asset manager)

**Type of climate-related information considered**

Energy usage data  
Emissions reduction targets  
Climate transition plans  
TCFD disclosures

**Process through which information is obtained**

Directly from the client/investee  
From an intermediary or business partner  
Data provider  
Public data sources

**Industry sector(s) covered by due diligence and/or risk assessment process**

Other, please specify (This due diligence is carried out for companies where it is deemed to be material. These companies can be in any sector.)

**State how this climate-related information influences your decision-making**

Our asset management business, Columbia Threadneedle, believes that material ESG factors are additive to the fundamental financial view of companies and thus bear on long-term investment performance. Consistent with that view, we have built a proprietary rating system covering over 8,500 global companies that leverages the Sustainability Accounting Standards Board (SASB®) financial materiality framework, designed for investors and companies alike, which helps them to distinguish between companies that perform well on financially material ESG factors and those that do not. Consistent with Columbia Threadneedle's view on the importance of material ESG factors, we routinely engage companies on a variety of ESG factors. Those engagements serve three primary purposes: 1) we convey our views and provide feedback on ESG standards of practice that we believe will enhance value, 2) engagement observations feed into and inform our fundamental research process to help drive deeper insights, and 3) we take a consultative approach to engagements, providing feedback and examples of good practice where possible. Our engagement agenda routinely include suggestions for companies to enhance their disclosure of ESG performance and to set targets where possible, and we recommend companies report in accordance with the SASB standards. Having joined the Net Zero Asset Managers Initiative in November 2021, we are working to address the climate impact of both our own business activity and our invested assets, through close partnership with clients and the companies we invest in. As noted above, we have developed a Net Zero tool, which we are in the process of rolling out across relevant asset classes. We have also joined Climate Action 100+, a collaborative engagement program through which we are actively engaging with the worlds' highest emitters. These commitments go hand-in-hand, as we believe that active engagement will be an important way in which we can support our clients' goals to reach net zero emissions by 2050.

**C2.3**

**(C2.3) Have you identified any inherent climate-related risks with the potential to have a substantive financial or strategic impact on your business?**

Yes

**C2.3a**

**(C2.3a) Provide details of risks identified with the potential to have a substantive financial or strategic impact on your business.**

**Identifier**

Risk 2

**Where in the value chain does the risk driver occur?**

Investing (Asset manager) portfolio

**Risk type & Primary climate-related risk driver**

Market	Changing customer behavior
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**Primary potential financial impact**

Decreased revenues due to reduced demand for products and services

**Climate risk type mapped to traditional financial services industry risk classification**

Market risk

**Company-specific description**

Climate change may adversely affect our investment portfolio and/or investor sentiment. We prioritize our ability to meet shifts in client preferences, which may include climate or other sustainability factors. Our goal is to be a leading global provider of RI integrated investment strategies and solutions, allowing us to support clients at different stages of their own RI journeys. We strive to help clients achieve better financial outcomes, support their evolving needs, and help them transfer their savings into a more sustainable future. Well-managed companies that look to the future are better positioned to navigate the risks and challenges inherent in business and achieve sustainable performance and long-term value creation. RI principles are an important factor, and we have developed proprietary tools that provide a robust RI framework and better analysis for portfolio managers to enhance their decision-making. Although RI research is made available to all portfolio managers, each portfolio management team within our firm makes its own investment decisions and certain teams may place more, less or no emphasis on ESG factors in any given investment decision.

**Time horizon**

Medium-term

**Likelihood**

Likely

**Magnitude of impact**

Unknown



**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact figure**

We do not disclose potential financial impacts.

**Cost of response to risk**

**Description of response and explanation of cost calculation**

Responding to client preferences is a critical driver in the development our business. As we see new trends in our clients' needs and interests over time, we will continue to adjust our product portfolio as necessary to ensure we provide significant choice in investment options to meet our clients' needs and reinforce our reputation as a leading asset manager.

**Comment**

As noted above, we do not disclose potential financial impacts.

**Identifier**

Risk 3

**Where in the value chain does the risk driver occur?**

Direct operations

**Risk type & Primary climate-related risk driver**

Current regulation	Mandates on and regulation of existing products and services
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**Primary potential financial impact**

Increased direct costs

**Climate risk type mapped to traditional financial services industry risk classification**

Strategic risk

**Company-specific description**

Climate change regulation may affect the prospects of companies and other entities whose securities we hold, or our willingness to continue to hold their securities. Examples of current regulation that may pose a risk include: 1. The Sustainable Finance Disclosure Regulation (SFDR), which imposes mandatory ESG disclosure obligations for asset managers and other financial market participants. 2. The European Union Taxonomy Regulation requires asset manager to disclose the alignment of their EEA products and their underlying investments against a harmonized framework that determines the environmental sustainability of an economic activity.

**Time horizon**

Short-term

**Likelihood**

Virtually certain

**Magnitude of impact**

Low

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact figure**

We do not disclose potential financial impacts.

**Cost of response to risk**

**Description of response and explanation of cost calculation**

Columbia Threadneedle Investments will consider Principal Adverse Impacts (PAIs) of its investment decisions on sustainability factors for appropriate financial products that are in scope of the EU Sustainable Finance Disclosure Regulation (SFDR). Further information on how we undertake our stewardship responsibilities and shareholder engagement practices can be found at: <https://www.columbiathreadneedle.co.uk/en/inst/about-us/responsible-investment/>. This includes information on our approach pursuant to the EU Shareholder Rights Directive II.

**Comment**

As noted above, we do not disclose potential financial impacts.

**Identifier**

Risk 4

**Where in the value chain does the risk driver occur?**

Direct operations

**Risk type & Primary climate-related risk driver**

Acute physical	Heat wave
----------------	-----------

**Primary potential financial impact**

Increased indirect (operating) costs

*Based on the location of our operations, additional drivers that may pose a risk include cold wave/frost, drought, flood, heavy precipitation, hurricane, storm, tornado, and wildfire.*

**Climate risk type mapped to traditional financial services industry risk classification**

Operational risk

**Company-specific description**

Climate change may increase the frequency and severity of weather-related disasters. The occurrence of natural disasters including earthquakes, hurricanes, floods, tornadoes, fires, blackouts, and severe winter weather, could adversely affect our operations. Such disasters and catastrophes may damage our facilities, preventing our service providers, employees and financial advisors from performing their roles, or otherwise disturbing our ordinary business operations. These impacts could be particularly severe to the extent they affect access to physical facilities, the physical well-being of large numbers of our employees, our computer-based data processing, transmission, storage and retrieval systems, and destroy or release valuable data.

**Time horizon**

Long-term

**Likelihood**

Unlikely

**Magnitude of impact**

Low

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact figure**

We do not disclose potential financial impacts

**Cost of response to risk**

**Description of response and explanation of cost calculation**

We consider the physical impacts of acute and chronic weather events to our facilities and business continuity. Our business continuity, real estate and security teams partner to evaluate possible impacts and address as necessary.

**Comment**

We do not disclose potential financial impacts

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**Identifier**

Risk 5

**Where in the value chain does the risk driver occur?**

Other parts of the value chain

**Risk type & Primary climate-related risk driver**

Acute physical	Heat wave
----------------	-----------

**Primary potential financial impact**

Increased direct costs

*All of the additional weather-related events that are listed as drivers could potentially impact our insurance claims.*

**Climate risk type mapped to traditional financial services industry risk classification**

Insurance risk

**Company-specific description**

Climate change may increase the frequency and severity of weather-related disasters that may impact insurance claims. The potential effects of natural disasters include but are not limited to the following: (i) a catastrophic loss of life may materially increase the amount of or accelerate the timing in which benefits are paid under our insurance policies; (ii) an increase in claims and any resulting increase in claims reserves caused by a disaster may harm the financial condition of our reinsurers, thereby impacting the cost and availability of reinsurance and the probability of default on reinsurance recoveries.

**Time horizon**

Medium-term

**Likelihood**

About as likely as not

**Magnitude of impact**

Medium-low

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact figure**

We do not disclose potential financial impacts.

**Cost of response to risk**

**Description of response and explanation of cost calculation**

**Comment**

We do not disclose potential financial impacts.

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**Identifier**

Risk 6

**Where in the value chain does the risk driver occur?**

Direct operations

**Risk type & Primary climate-related risk driver**

Emerging regulation	Enhanced emissions-reporting obligations
---------------------	--

**Primary potential financial impact**

Increased indirect (operating) costs

**Climate risk type mapped to traditional financial services industry risk classification**

Policy and legal risk

**Company-specific description**

Any future changes to the laws and regulations applicable to our businesses, as well as changes to the interpretation and enforcement of such laws and regulations, may affect our operations and increase costs. One example of this is with the United States Securities & Exchange Commission, which has proposed new rules to enhance and standardize disclosures that registrants make about climate-related risks, their climate-related targets and goals, their greenhouse gas (GHG) emissions and how the board of directors and management oversee climate-related risks. Additionally, state insurance regulators are expecting insurers to take a proportionate and strategic approach in managing climate risk, and are requiring disclosures around companies' approaches. In the United Kingdom, the Financial Conduct Authority is requiring asset managers to publish an annual entity-level TCFD report on how they take climate-related risks and opportunities into account when managing investments on behalf of clients. All of these new regulations have the potential to increase direct costs associated with consulting, compliance and auditing service companies, to ensure that we can meet the regulatory requirements.

**Time horizon**

Medium-term

**Likelihood**

Unlikely

**Magnitude of impact**

Medium-low

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact figure**

We do not disclose potential financial impacts.

**Cost of response to risk**

**Description of response and explanation of cost calculation**

Compliance with emerging regulations related to climate change is resource intensive. We continue to commit management time and resources to ensure compliance with evolving regulations and to meet stakeholder expectations.

**Comment**

We do not disclose potential financial impacts.

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**Identifier**

Risk 1

**Where in the value chain does the risk driver occur?**

Direct operations

**Risk type & Primary climate-related risk driver**

Reputation	Increased stakeholder concern or negative stakeholder feedback
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**Primary potential financial impact**

Decreased revenues due to reduced demand for products and services

**Climate risk type mapped to traditional financial services industry risk classification**

Reputational risk

**Company-specific description**

Ameriprise's reputation is one of our most important assets. Corporations are increasingly being asked by clients, employees, or shareholders to take public positions on certain ESG issues such as climate change. Some firms may not be perceived as being socially responsible companies. Stakeholders could challenge firms like Ameriprise regarding the social consequences of their business practices, principles and civic obligations. Clients, advisors, employees, or shareholders may prefer to be associated with firms that have higher ratings and/or public positions on certain ESG issues such as climate change. Additionally, regulators are increasingly asking firms to consider climate risks and other ESG-related risks within risk management and long-range planning. Within our global asset management business, clients and regulators (primarily in Europe) are asking or requiring asset managers to disclose their approach to incorporating RI (e.g., sustainability) into investment decisions and articulate adverse impacts from investments on ESG factors. As the demand for and number of ESG products grows, regulators are considering additional reporting requirements.

**Time horizon**

Medium-term

**Likelihood**

More likely than not

**Magnitude of impact**

Medium-high

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact figure**

We do not disclose potential financial impacts.

**Cost of response to risk**

**Description of response and explanation of cost calculation**

Ameriprise has many programs and resources dedicated to demonstrating how Ameriprise acts as a good corporate citizen and address the risks associated with climate change, including: publishing a Responsible Business Report annually; earning recognition across the real estate that we operate, as a low direct greenhouse gas emitter; developing an ESG roadmap of phased enhancements within our advice and wealth management business, including expanded product offerings, increased advisor education and tools, and integration throughout the advisor and client experience; and developing a robust approach to ESG and RI within our asset management business, and through the BMO GAM EMEA acquisition.

**Comment**

We do not disclose potential financial impacts.

C2.4

**(C2.4) Have you identified any climate-related opportunities with the potential to have a substantive financial or strategic impact on your business?**

Yes

C2.4a

**(C2.4a) Provide details of opportunities identified with the potential to have a substantive financial or strategic impact on your business.**

**Identifier**

Opp1

**Where in the value chain does the opportunity occur?**

Investing (Asset manager) portfolio

**Opportunity type**

Products and services

**Primary climate-related opportunity driver**

Shift in consumer preferences

**Primary potential financial impact**

Increased revenues resulting from increased demand for products and services

**Company-specific description**

At Columbia Threadneedle, our goal is to be a leading global provider of RI-integrated investment strategies and solutions, allowing us to support clients at different stages of their own RI journeys. We want to help clients achieve better financial outcomes, support their evolving needs, and help them transfer their savings into a more sustainable future. In practice, this means we will integrate RI throughout our global business. We are committed to supporting our clients on their own RI journeys through

time, evolving our approach and resources to ensure we can respond to changing investor demand and a fast-moving regulatory environment. ESG factors are considered within the fundamental research of companies, which drives security selection. We also continued to develop our range of RI Sustainable Outcomes funds in EMEA, with the launch of the Sustainable Outcomes Pan European Equity Fund. Like the existing Global and UK Sustainable Outcomes strategies, the fund seeks to deliver both tangible, positive sustainable outcomes, and strong financial returns, enabling clients to invest in a better future. As investors, we believe we play an important part in the transition to a lower emissions world. Having joined the Net Zero Asset Managers Initiative in November 2021, Columbia Threadneedle is working to address the climate impact of both our own business activity and our invested assets, through close partnership with clients and the companies we invest in. We have also joined Climate Action 100+, a collaborative engagement program through which we are actively engaging with the worlds' highest emitters. These commitments go hand-in-hand, as we believe that active engagement will be a crucial way in which we can support our clients' goals to reach net zero emissions by 2050.

**Time horizon**

Short-term

**Likelihood**

Virtually certain

**Magnitude of impact**

Medium-high

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact figure**

We do not disclose potential financial impacts.

**Cost to realize opportunity**

**Strategy to realize opportunity and explanation of cost calculation**

Looking forward, Columbia Threadneedle has made two key commitments to advance our business strategy in 2022. We are supportive of the UK Stewardship Code and believe our Firm philosophy is in alignment with the principles set out in the new Stewardship Code. Having completed the acquisition of BMO's EMEA asset management business, we look forward to embedding a comprehensive, globally consistent approach to stewardship. Columbia Threadneedle has also made public its intentions to publish the recommended disclosures by the TCFD on our portfolios and business activities. The framework seeks to encourage more informed investment, decisions, bringing greater understanding of the financial implications of climate change. This will be a key strategic focus of ours in the coming year, and one which requires a globally integrated approach.

**Comment**

See above – we would not disclose potential costs related to this opportunity.

**Identifier**

Opp2

**Where in the value chain does the opportunity occur?**

Other parts of the value chain

**Opportunity type**

Products and services

**Primary climate-related opportunity driver**

Reputational benefits resulting in increased demand for goods/services

**Primary potential financial impact**

Other, please specify (Deepening client and advisor relationship by providing quality investment products and services that align with their values and interest in environment and social concerns. )

**Company-specific description**

In addition to the RI capability within Columbia Threadneedle, Ameriprise offers clients and advisors a range of RI/Thematic ESG products (aka Impact and Sustainable investing) and solutions from third-party asset managers within mutual fund, ETF and separate account investment vehicles. We also provide Ameriprise advisors with our perspective on ESG trends through the Ameriprise Investment Research Group. In addition to third party asset managers offerings, Ameriprise introduced a portfolio series within the Active Portfolios® program -- Active Sustainable Investing World Portfolios, which focuses on growth but also incorporates ESG factors into investment decisions. As of end of Q1 2022, clients have invested over \$3B within this strategy, and more than 1700 advisors are incorporating it into client portfolios. We continue to have strong interest in ESG products and solutions. While these products are more broadly ESG-focused, we recognize that climate is an element of ESG.

**Time horizon**

Short-term

**Likelihood**

Very likely

**Magnitude of impact**

Unknown

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact figure**

We would note that we do not disclose potential financial impacts.

**Cost to realize opportunity**

**Strategy to realize opportunity and explanation of cost calculation**

Ameriprise will continue to research and develop ESG products and services as client and advisor demands and investment availability evolve.

**Comment**

See above – we would not disclose potential costs related to this opportunity.

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**Identifier**

Opp3

**Where in the value chain does the opportunity occur?**

Direct operations

**Opportunity type**

Resource efficiency

**Primary climate-related opportunity driver**

Move to more efficient buildings

**Primary potential financial impact**

Reduced indirect (operating) costs

**Company-specific description**

Within the real estate Ameriprise controls, we are focused on operating our buildings efficiently. • Our corporate-controlled real estate, the Ameriprise Financial Center and the Ameriprise Client Service Center, are ENERGY STAR certified. • The Ameriprise Financial Center was the first building in Minneapolis to receive the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) — Existing Building certification. The Financial Center received LEED Silver Certification and our Client Service Center received LEED Gold Certification. • In 2021, Columbia Threadneedle moved its Boston Headquarters to a LEED Platinum certified building at Atlantic Wharf, reducing our square footage considerably at the same time. • Our New York City headquarters is located in World Trade Center, a Certified LEED Gold building. • At our Columbia Threadneedle headquarters in London, we are a tenant in the award-winning Cannon Place, which is BREEAM Recognized. • At our Gurugram facility in India, environmental initiatives are being incorporated into the construction that's currently underway, including a rainwater harvesting system and conversion of diesel generators to run on natural gas.

**Time horizon**

Medium-term

**Likelihood**

Virtually certain

**Magnitude of impact**

Medium-low

**Are you able to provide a potential financial impact figure?**

No, we do not have this figure

**Potential financial impact figure (currency)**

<Not Applicable>

**Potential financial impact figure – minimum (currency)**

<Not Applicable>

**Potential financial impact figure – maximum (currency)**

<Not Applicable>

**Explanation of financial impact figure**

We would note that we do not disclose potential financial impacts.

**Cost to realize opportunity**

**Strategy to realize opportunity and explanation of cost calculation**

We partner with our local utilities in Minneapolis and participate in load shedding to help reduce overall demand. We also continue to look for ways that we can increase efficiency in our buildings through routine maintenance, upgrades and renovations. For example, we have reduced energy consumption by installing automatic light sensors, adjusting heating and cooling processes, and upgrading to lower wattage light bulbs. And we participate in Xcel Energy's Commercial Efficiency Program to evaluate and implement energy efficiency projects.

**Comment**

See above – we would not disclose potential costs related to this opportunity.

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### C3. Business Strategy

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#### C3.1

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**(C3.1) Does your organization's strategy include a transition plan that aligns with a 1.5°C world?**

**Row 1**

**Transition plan**

No, but our strategy has been influenced by climate-related risks and opportunities, and we are developing a transition plan within two years

**Publicly available transition plan**

<Not Applicable>

**Mechanism by which feedback is collected from shareholders on your transition plan**

<Not Applicable>

**Description of feedback mechanism**

<Not Applicable>

**Frequency of feedback collection**

<Not Applicable>

**Attach any relevant documents which detail your transition plan (optional)**

<Not Applicable>

**Explain why your organization does not have a transition plan that aligns with a 1.5°C world and any plans to develop one in the future**

Our asset management business, Columbia Threadneedle, is a signatory to the Net Zero Asset Managers Initiative. The initiative aims to galvanize the asset management industry to commit to a goal of net zero emissions and to play their part to deliver the goals of the Paris Agreement and a just transition. At the enterprise level, we have not made a decision regarding a formal transition plan. We are learning from the work that is being done within Columbia Threadneedle, as it relates to TCFD and its commitment to the Net Zero Asset Managers Initiative. This is ongoing and will be also informed by regulatory requirements.

**Explain why climate-related risks and opportunities have not influenced your strategy**

<Not Applicable>

**C3.2**

**(C3.2) Does your organization use climate-related scenario analysis to inform its strategy?**

	Use of climate-related scenario analysis to inform strategy	Primary reason why your organization does not use climate-related scenario analysis to inform its strategy	Explain why your organization does not use climate-related scenario analysis to inform its strategy and any plans to use it in the future
Row 1	No, but we anticipate using qualitative and/or quantitative analysis in the next two years	Other, please specify (Columbia Threadneedle will be using scenario analysis to understand risk/opportunity at a business and portfolio level within the next two years, as this is a regulatory requirement under TCFD.)	Our climate strategy continues to evolve. As an asset manager operating in Europe and the UK, where regulators and policymakers are introducing new sustainable finance requirements, climate considerations are a priority. In 2021, Columbia Threadneedle signed on to multiple initiatives to support the transition toward a low-carbon economy, including the Net Zero Asset Managers Initiative and Climate Action 100+. Columbia Threadneedle will build upon these commitments in 2022 and align with their work to report consistent with the Task Force on Climate-related Financial Disclosures (TCFD). They will be using scenario analysis to understand risk/opportunity at a business and portfolio level within the next two years, as this is a regulatory requirement under TCFD Building off the work in asset management, we have calculated a complete carbon footprint for Ameriprise, including scope 1 and 2 GHG emissions from all real estate that we occupy, and scope 3 emissions where we have the relevant data. This work will inform future decisions related to how we appropriately manage the risks and opportunities of climate change, and how we consider incorporating scenario analysis to inform our strategy.

**C3.3**

**(C3.3) Describe where and how climate-related risks and opportunities have influenced your strategy.**

	Have climate-related risks and opportunities influenced your strategy in this area?	Description of influence
Products and services	Yes	As Environmental, Social and Governance (ESG) investment trends evolve, we expect our clients and advisors will be interested in allocating a higher percentage of assets to RI/ESG strategies and solutions over time. This expectation is driving our strategy around some of the products and services that we offer, and presenting some climate-related opportunities. At Columbia Threadneedle, we offer a range of dedicated RI strategies, including our innovative Social Bond franchise and recently launched ESG strategies in EMEA, for clients seeking to more actively promote ESG factors or achieve specific sustainable outcomes. In addition to the RI capability within Columbia Threadneedle, Ameriprise offers clients and advisors a range of RI/Thematic ESG products and solutions from third-party asset managers within mutual fund, ETF and separate account investment vehicles, as they consider the impact of climate change on their investments. We have a robust due diligence process that helps ensure our clients receive quality investments. For sustainable and impact mutual funds, ETFs and separately managed accounts, we take additional steps to help determine if an investment centrally factors ESG into decisions. In the short-term, we are actively working to enhance this with an overlay. We also provide advisors with the essential fundamentals of ESG investing, including where appropriate links to Columbia Threadneedle and third-party asset manager materials and training. Our climate-related products and services have traditionally been considered on a longer-term horizon. However, as demand for RI and sustainable investing options continues to increase, we expect this will be viewed more on a short- and/or medium-term horizon, as our strategy around climate-related risks and opportunities continues to evolve.
Supply chain and/or value chain	Evaluation in progress	Climate-related risks and opportunities have not yet influenced our supply chain strategy, as we are initially focused on evaluating the risks and opportunities on our operations, relevant products and services, and investment in research and development. We are beginning the process and developing the governance to evaluate the impact of climate-related risks and opportunities on our supply chain, understanding the evolving regulatory environment in the U.S. and abroad.
Investment in R&D	Yes	Our team of 200 analysts and research associates within our asset management business is dedicated to original, independent research. Working collaboratively across all major asset classes our teams utilize big data and analytics, such as machine learning and augmented intelligence, to turn information into forward-looking insights that can add real value to our investment decisions, enhancing our ability to help deliver good outcomes for our clients. Ameriprise recognizes that the focus on climate change will be an important consideration within our economies, in both the short and long term. The nature of these changes will shape our strategy around climate-related risks and opportunities within R&D, in the short, medium and long term.
Operations	Yes	Ameriprise's operations are impacted by climate-related risks and opportunities, which influences our real estate management strategy. We manage the risks and opportunities of climate change across our physical footprint. Our enterprise risk management process includes assessing, protecting against and mitigating the physical risks of catastrophic weather events affecting the company, our clients and our policyholders. Within the real estate Ameriprise controls, we are focused on operating our buildings efficiently and reducing waste. For example, we partner with our local utilities in Minneapolis and participate in load shedding to help reduce overall demand. We also participate in Xcel Energy's Commercial Efficiency Program to evaluate and implement energy efficiency projects. We have reduced energy consumption by installing automatic light sensors, reducing heating and cooling, and upgrading to lower wattage light bulbs. At our Minneapolis sites, we've introduced a composting program to gather and dispose of compostable materials and food waste from our cafeterias. The time horizon varies for these projects and strategies, depending on what they are. Generally, capital investments, equipment replacements, and other building systems are considered on a long-term horizon.

**C3.4**

**(C3.4) Describe where and how climate-related risks and opportunities have influenced your financial planning.**

	Financial planning elements that have been influenced	Description of influence
Row 1	Revenues Indirect costs Acquisitions and divestments	Revenues: As client demand for RI options increases in light of climate-related issues, revenues for Ameriprise could be impacted. Ameriprise offers sustainable and impacts investments, mutual funds, and ETFs in every major asset category. Ameriprise also offers Separately Managed Accounts and an Active Portfolio series. The Active Portfolios® program, Active Sustainable Investing World Portfolios, launched in 2018. By year-end 2021 the program held \$3B in assets. Our Investment Research Group evaluates this product offering annually, and all products meet our due diligence standards. To help advisors find ESG products, we added sustainable screens to advisor tools. By year-end 2021 over 8000 of our advisors held sustainable and impact investments. As clients seek to include ESG factors or achieve specific sustainable outcomes, we seek to offer quality products that meet their demand. Indirect Costs: In 2021, Ameriprise purchased 19,944M kWh of Renewable Energy Certificates (RECs) to offset the 2021 energy consumption of the two buildings that make up the 1.8 million square foot Minneapolis campus. Additionally, climate-related risks could impact our operating costs and related financial planning with regards to energy costs. Typically we budget a conservatively high utility number in case we face a harsh winter or summer. Acquisitions: The acquisition of BMO Financial Group's European-based asset management business in 2021 provides important and complementary capabilities to further evolve our climate change strategy and capabilities. As our teams come together, we will benefit at the enterprise level in continuing to develop our perspective and actions to actively manage the risks and opportunities related to climate change, both in terms of our corporate emissions and goal setting, as well as the work ahead to meet those goals.

**C-FS3.6**

**(C-FS3.6) Does the policy framework for your portfolio activities include climate-related requirements for clients/investees, and/or exclusion policies?**

Yes, our policies include climate-related requirements that clients/investees need to meet

**C-FS3.6a**



**(C-FS3.6a) Provide details of the policies which include climate-related requirements that clients/investees need to meet.**

**Portfolio**

Investing (Asset manager)

**Type of policy**

Engagement policy  
Sustainable/Responsible Investment Policy  
Proxy voting

**Portfolio coverage of policy**

100

**Policy availability**

Publicly available

**Attach documents relevant to your policy**

[https://www.columbiathreadneedle.co.uk/uploads/2020/10/93d385df86834458ccf068c87821fa9c/en\\_gri\\_and\\_corporate\\_governance\\_at\\_threadneedle.pdf](https://www.columbiathreadneedle.co.uk/uploads/2020/10/93d385df86834458ccf068c87821fa9c/en_gri_and_corporate_governance_at_threadneedle.pdf)  
CTI Responsible Investment and Proxy Voting Policy.pdf

**Criteria required of clients/investees**

No criteria required

**Value chain stages of client/investee covered by criteria**

Direct operations only

**Timeframe for compliance with policy criteria**

No timeframe

**Industry sectors covered by the policy**

Energy  
Materials  
Capital Goods  
Commercial & Professional Services  
Transportation  
Automobiles & Components  
Consumer Durables & Apparel  
Consumer Services  
Retailing  
Food & Staples Retailing  
Food, Beverage & Tobacco  
Household & Personal Products  
Health Care Equipment & Services  
Pharmaceuticals, Biotechnology & Life Sciences  
Software & Services  
Technology Hardware & Equipment  
Semiconductors & Semiconductor Equipment  
Telecommunication Services  
Media & Entertainment  
Utilities  
Real Estate  
Other, please specify

**Exceptions to policy based on**

<Not Applicable>

**Explain how criteria coverage and/or exceptions have been determined**

Building on our ESG integration and the collaboration between investment teams, our engagement approach covers a broad range of ESG issues, and climate issues are emphasized. Prioritization, planning and the scope for collaboration are important factors in shaping our engagement objectives and activities. The decision to intervene is prioritized based on our assessment of the significance of issues to the company, the risks to our clients, scope to effect change, and opportunities to collaborate. Given the fragmented nature of shareholder ownership we seek to work with our colleagues through industry networks and associations such as CA100+. During the most recent year we conducted numerous engagements where climate was the sole, or primary focus of the discussion, and dozens more where climate matters were among our engagement objectives. And we voted against chairs of company boards for lagging climate adaptation practices, and supported dozens of shareholder proposals across a range of climate-related topics. We detail our results of several of our recent engagements with Energy sector companies in case studies in our RI Quarterly publications, which are available on our website at: <https://www.columbiathreadneedle.co.uk/en/inst/about-us/responsible-investment/>

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**C-FS3.6c**

**(C-FS3.6c) Why does the policy framework for your portfolio activities not include climate-related requirements for clients/investees, and/or exclusion policies?**

As an active asset manager and long-term investor, we act as a fiduciary under federal and state law (or other applicable law outside of the U.S.) to our clients to help them meet their investment objectives. As a fiduciary, we invest on behalf of clients in accordance with a client's investment guidelines, and these individual client guidelines may limit or restrict our ability to purchase certain securities in their individual account. Additionally, we want to avoid unintended consequences, such as forcing over-allocation to naturally low-emissions sectors. Our methodology instead focuses on 'real world' emissions reduction. This may be consistent with investing in high impact, heavy emitting sectors and engaging with companies to encourage them to align with a net zero trajectory. The [IEA's](#) Net Zero Emissions report shows that all sectors of the economy need to decarbonize and we believe that a net zero investment approach should reflect this.

C-FS3.7

(C-FS3.7) Does your organization include climate-related requirements in your selection process and engagement with external asset managers?

	Climate-related requirements included in selection process and engagement with external asset managers	Primary reason for not including climate-related requirements in selection process and engagement with external asset managers	Explain why climate-related requirements are not included in selection process and engagement with external asset managers and your plans for the future
Row 1	Yes	<Not Applicable>	<Not Applicable>

C-FS3.7a

(C-FS3.7a) Provide details of the climate-related requirements included in your selection process and engagement with external asset managers.

**Coverage**

Majority of assets managed externally

**Mechanisms used to include climate-related requirements in external asset manager selection**

Include climate-related requirements in investment mandates

Include climate-related requirements in requests for proposals

Preference for investment managers with an offering of funds resilient to climate change

Review investment manager’s climate performance (e.g., active ownership, proxy voting records, under-weighting in high impact activities)

Review investment manager’s climate-related policies

Use of external data on investment managers regarding climate risk management

**Describe how you monitor and engage with asset managers to ensure investment activities are consistent with your climate strategy**

In the multi-asset team that joined Columbia Threadneedle as part of the recent acquisition of BMO GAM EMEA, we invest in external investment trusts, and work to develop solutions in partnership with fiduciary clients. Part of our process is asking a number of ESG questions that include inquiries on the environment and Net Zero. We will then follow up, where necessary, with the managers. This is still a developing area, and the plan is to introduce additional modules that will provide a basis for more detailed guidance and performance indicators. As an example, please see: <https://esgclarity.com/bmo-gam-multi-manager-team-to-run-esg-due-diligence-service-for-lestrade/>

C-FS3.8

(C-FS3.8) Does your organization include covenants in financing agreements to reflect and enforce your climate-related policies?

	Climate-related covenants in financing agreements	Primary reason for not including climate-related covenants in financing agreements	Explain why your organization does not include climate-related covenants in financing agreements and your plans for the future
Row 1	No, and we do not plan to include climate-related covenants in the next two years	Judged to be unimportant, explanation provided	Ameriprise Bank, FSB, provides banking capabilities for advisors to offer their clients, within our advice and wealth management business. In terms of risk management considerations as it relates to climate, Ameriprise Bank is part of Ameriprise and operates within our enterprise risk management framework.

C4. Targets and performance

C4.1

(C4.1) Did you have an emissions target that was active in the reporting year?

No target

C4.1c

(C4.1c) Explain why you did not have an emissions target, and forecast how your emissions will change over the next five years.

	Primary reason	Five-year forecast	Please explain
Row 1	Insufficient data on operations	We expect our emissions will decrease over the next five years as we look for ways to operate more efficiently.	Building off the work that is being completed within our asset management business and their commitment to the Net Zero Asset Managers Initiative, we have started the process to calculate a complete carbon footprint for Ameriprise, including scope 1 and 2 GHG emissions from all real estate that we occupy, and scope 3 emissions where we have the relevant data. This work will inform future decisions related to how we appropriately manage the risks and opportunities of climate change, and how we consider setting emissions targets.

C4.2

(C4.2) Did you have any other climate-related targets that were active in the reporting year?

Net-zero target(s)

## C4.2c

### (C4.2c) Provide details of your net-zero target(s).

**Target reference number**

NZ1

**Target coverage**

Investing (Asset manager)

**Absolute/intensity emission target(s) linked to this net-zero target**

Abs1

**Target year for achieving net zero**

2050

**Is this a science-based target?**

No, but we anticipate setting one in the next 2 years

**Please explain target coverage and identify any exclusions**

As part of their commitment to the Net Zero Asset Managers Initiative, Columbia Threadneedle has set a goal to be net zero by 2050 for financed emissions.

**Do you intend to neutralize any unabated emissions with permanent carbon removals at the target year?**

Unsure

**Planned milestones and/or near-term investments for neutralization at target year**

<Not Applicable>

**Planned actions to mitigate emissions beyond your value chain (optional)**

As part of their commitment to the Net Zero Asset Managers Initiative, Columbia Threadneedle has set a goal to be net zero by 2050 for financed emissions. They are currently developing a plan to mitigate these emissions, and will report more on this target and their progress in future TCFD reports.

## C4.3

### (C4.3) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

Yes

## C4.3a

### (C4.3a) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Under investigation	3	
To be implemented*		
Implementation commenced*		
Implemented*	4	
Not to be implemented		

## C4.3b

**(C4.3b) Provide details on the initiatives implemented in the reporting year in the table below.**

**Initiative category & Initiative type**

Energy efficiency in buildings	Maintenance program
--------------------------------	---------------------

**Estimated annual CO2e savings (metric tonnes CO2e)**

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 2 (location-based)  
Scope 2 (market-based)

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

4960

**Investment required (unit currency – as specified in C0.4)**

**Payback period**

<1 year

**Estimated lifetime of the initiative**

Ongoing

**Comment**

This initiative refers to the energy savings projects completed in 2021 at the Minneapolis Client Service Center, including replacement of a cooling unit in a ramp elevator mechanical room, and replacing bulbs with LED lamps in various areas of the building. We have not calculated the estimated annual CO2e savings associated with these projects.

**Initiative category & Initiative type**

Waste reduction and material circularity	Waste reduction
--	-----------------

**Estimated annual CO2e savings (metric tonnes CO2e)**

**Scope(s) or Scope 3 category(ies) where emissions savings occur**

Scope 3 category 5: Waste generated in operations

**Voluntary/Mandatory**

Voluntary

**Annual monetary savings (unit currency – as specified in C0.4)**

**Investment required (unit currency – as specified in C0.4)**

**Payback period**

No payback

**Estimated lifetime of the initiative**

Ongoing

**Comment**

At our Financial Center and Client Service Center in Minneapolis, recyclable materials are transported to a local provider where more than 90% are sold to markets in the Midwest and 100% stay in North America. In the fall of 2021, we also rolled out a comprehensive composting program within our Minneapolis and Boston locations. As a result, all compostable waste is being diverted from landfills and incinerators. At our Minneapolis sites, any remaining waste that cannot be recycled or composted is taken to a local mass burn Waste to Energy facility. The waste is burned with the heat used to generate steam, which in turn powers turbines that generate enough electricity to supply over 26,000 homes with their annual energy needs. We have not calculated the estimated annual CO2e savings associated with these projects.

**C4.3c**

**(C4.3c) What methods do you use to drive investment in emissions reduction activities?**

Method	Comment
Partnering with governments on technology development	We partner with our local utilities in Minneapolis and participate in load shedding to help reduce overall demand. We also participate in Xcel Energy's Commercial Efficiency Program to evaluate and implement energy efficiency projects.
Compliance with regulatory requirements/standards	We have invested and will continue to invest substantial resources to ensure compliance with all regulatory requirements/standards, including those related to climate.

**C-FS4.5**

**(C-FS4.5) Do any of your existing products and services enable clients to mitigate and/or adapt to the effects of climate change?**

Yes

**(C-FS4.5a) Provide details of your existing products and services that enable clients to mitigate and/or adapt to climate change, including any taxonomy used to classify the products(s).**

**Product type/Asset class/Line of business**

Investing	Other, please specify (Wealth Management Services)
-----------	--

**Taxonomy or methodology used to classify product**

Internally classified

**Description of product**

We offer several third-party managed packaged solutions, including a series of mutual fund and ETF models focused on investing in a wide range of complex environmental, social and governance factors. We also actively curate an offering of mutual funds and ETFs that centrally factor sustainable and impact investing. Our mutual fund and ETF offerings span all major asset classes plus thematic areas, such as low carbon footprint. Active Portfolios® investments are one option in our advisory solutions. The Active Sustainable Investing World Portfolios may be suitable for clients who seek focus on sustainable investing for a wide range of complex environmental, social and governance (ESG) factors.

**Product enables clients to mitigate and/or adapt to climate change**

Mitigation

**Portfolio value (unit currency – as specified in C0.4)**

**% of total portfolio value**

**Type of activity financed/insured or provided**

Other, please specify (Brokerage mutual funds and ETFs that meet firm due diligence standards and centrally factor ESG. We also offer Separately Managed Accounts and third-party managed portfolios that consider complex environmental, social and governance factors.)

**Product type/Asset class/Line of business**

Investing	Real estate/Property
-----------	----------------------

**Taxonomy or methodology used to classify product**

Internally classified

**Description of product**

In 2010, the asset management business of Ameriprise, Columbia Threadneedle, launched the Low Carbon Workplace Trust and assembled a team of industry leaders in property investment management, design, carbon engineering/refurbishment and carbon compliance. Together with our partners we identify suitable office buildings and turn them into modern, energy-efficient workplaces, while at the same time generating returns for investors. We then let and manage the buildings to ensure ongoing management and reduction of energy wastage. Reflecting the certification of its office investment portfolio to operational carbon neutrality in 2019, the fund changed its name to the Threadneedle Carbon Neutral Real Estate Fund ('the Fund') in May 2020. The name change reflected the status of the Fund as a pioneer of carbon reduction in commercial real estate assets through value-add refurbishment and continued operational carbon neutral management. As large asset owners with stewardship responsibilities, institutional investors are increasingly looking for a responsible, tangible aspect to their investments, whether social or environmental. This is increasingly mirrored by the demands in the occupational market and we are seeing sustainability and carbon neutrality credentials being high on tenant's agenda when considering stock selection. The Carbon Neutral Real Estate Fund concept is economically viable, socially responsible, repeatable, scalable and profitable. It is a great example of the private sector taking the initiative and developing new commercial models that unlock the value in low carbon refurbishment. For more information and to view Investor Reports go to: <https://www.columbiathreadneedle.co.uk/en/inst/campaign/carbon-neutral-real-estate-fund/>

**Product enables clients to mitigate and/or adapt to climate change**

Mitigation

**Portfolio value (unit currency – as specified in C0.4)**

204000000

**% of total portfolio value**

**Type of activity financed/insured or provided**

Green buildings and equipment

**Product type/Asset class/Line of business**

Investing	Other, please specify (This service extends across all business lines within Ameriprise Financial)
-----------	--

**Taxonomy or methodology used to classify product**

Internally classified

**Description of product**

At Ameriprise Financial, we're proud of our focus on promoting electronic delivery of documents to lessen the generation of paper, while also honoring how our clients prefer to receive their documents. Ameriprise exceeds industry peers in digital document adoption across all major correspondence categories except tax documents. Tax document e-delivery was only made available in recent months, and we've already seen a good election of that option. Our Ameriprise clients can choose how they want to receive their five different document types through their personal secure site on ameriprise.com. We've seen a positive trend over time toward client e-delivery. Since 2019, we've made a concerted effort to promote and encourage e-delivery across most of the above document types and recently expanded to add tax documents. • The percentage of client documents suppressed and made available electronically has increased to more than 80% since 2019, representing approximately 12.8 million fewer documents printed and mailed annually compared to three years ago. • Tax documents were made e-delivery eligible starting with the 2020 tax season, and in the first two tax seasons, 25% of eligible clients opted-in for e-delivery, resulting in over 700,000 tax packages per year being suppressed from the print stream. • Starting in 2022, client address change notifications were made e-delivery eligible, resulting in a projected reduction of 84,000 mailings annually; non-regulatory transaction confirmations were converted to electronic-only delivery in 2022, reducing mailings by another 540,000 annually. • More than three-quarters of all client-signed documents are now

electronic, with a goal of 83% by end of 2022. In order to continue to encourage clients to consider if they'd like to receive documents online (electronically) vs. through the mail (paper), our team has recently offered new clients a default option of all document types being sent to them electronically with the option for them to change that election to paper delivery at that same time. Ultimately we believe in giving our clients the choice, as we know some have a strong preference for paper, for certain documents. We feel this strikes a balance toward encouraging, yet not requiring e-delivery.

**Product enables clients to mitigate and/or adapt to climate change**

Mitigation

**Portfolio value (unit currency – as specified in C0.4)**

% of total portfolio value

**Type of activity financed/insured or provided**

Paperless/digital service

**C5. Emissions methodology**

**C5.1**

**(C5.1) Is this your first year of reporting emissions data to CDP?**

No

**C5.1a**

**(C5.1a) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?**

Row 1

**Has there been a structural change?**

No

**Name of organization(s) acquired, divested from, or merged with**

<Not Applicable>

**Details of structural change(s), including completion dates**

<Not Applicable>

**C5.1b**

**(C5.1b) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?**

	Change(s) in methodology, boundary, and/or reporting year definition?	Details of methodology, boundary, and/or reporting year definition change(s)
Row 1	Yes, a change in boundary	In previous years, we reported only the Scope 1 and 2 emissions associated with our Minneapolis campus, which represents about half of our total carbon footprint. As our capabilities and resources have expanded, we are now able to calculate Scopes 1, 2 and portions of Scope 3 across our entire operational footprint.

**C5.1c**

**(C5.1c) Have your organization's base year emissions been recalculated as result of the changes or errors reported in C5.1a and C5.1b?**

	Base year recalculation	Base year emissions recalculation policy, including significance threshold
Row 1	Yes	We follow the guidelines of the World Resource Institute (WRI)/World Business Council for Sustainable Development (WBCSD) GHG Protocol for adjusting the base year GHG inventory. The base year inventory will be adjusted in response to any structural or methodology changes, if the resulting adjustment is more than 5% of base year emissions. Adjustments less than this threshold are considered insignificant and will be decided case by case.

**C5.2**

**(C5.2) Provide your base year and base year emissions.**

**Scope 1**

**Base year start**

January 1 2019

**Base year end**

December 31 2019

**Base year emissions (metric tons CO2e)**

7059

**Comment**

**Scope 2 (location-based)**

**Base year start**

January 1 2019

**Base year end**

December 31 2019

**Base year emissions (metric tons CO2e)**

32050

**Comment**

**Scope 2 (market-based)**

**Base year start**

January 1 2019

**Base year end**

December 31 2019

**Base year emissions (metric tons CO2e)**

25468

**Comment**

**Scope 3 category 1: Purchased goods and services**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 2: Capital goods**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)**

**Base year start**

January 1 2019

**Base year end**

December 31 2019

**Base year emissions (metric tons CO2e)**

7083

**Comment**

**Scope 3 category 4: Upstream transportation and distribution**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 5: Waste generated in operations**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 6: Business travel**

**Base year start**

January 1 2019

**Base year end**

December 31 2019

**Base year emissions (metric tons CO2e)**

13679

**Comment**

**Scope 3 category 7: Employee commuting**

**Base year start**

January 1 2019

**Base year end**

December 31 2019

**Base year emissions (metric tons CO2e)**

13892

**Comment**

**Scope 3 category 8: Upstream leased assets**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 9: Downstream transportation and distribution**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 10: Processing of sold products**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 11: Use of sold products**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 12: End of life treatment of sold products**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 13: Downstream leased assets**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3 category 14: Franchises**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**



**Scope 3 category 15: Investments**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**Scope 3: Other (upstream)**

**Base year start**

January 1 2019

**Base year end**

December 31 2019

**Base year emissions (metric tons CO2e)**

78

**Comment**

This metric is emissions associated with employees working from home.

**Scope 3: Other (downstream)**

**Base year start**

**Base year end**

**Base year emissions (metric tons CO2e)**

**Comment**

**C5.3**

---

**(C5.3) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.**

The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

**C6. Emissions data**

---

**C6.1**

---

**(C6.1) What were your organization's gross global Scope 1 emissions in metric tons CO2e?**

**Reporting year**

**Gross global Scope 1 emissions (metric tons CO2e)**

6853

**Start date**

January 1 2021

**End date**

December 31 2021

**Comment**

**Past year 1**

**Gross global Scope 1 emissions (metric tons CO2e)**

6142

**Start date**

January 1 2020

**End date**

December 31 2020

**Comment**

This is restated data. In previous years, we reported only the Scope 1 and 2 emissions associated with our Minneapolis campus. As our capabilities and resources have expanded, we are now able to calculate Scopes 1, 2 and portions of Scope 3 across our entire operational footprint.

**Past year 2**

**Gross global Scope 1 emissions (metric tons CO2e)**

7059

**Start date**

January 1 2019

**End date**

December 31 2019

**Comment**

This is restated data. In previous years, we reported only the Scope 1 and 2 emissions associated with our Minneapolis campus. As our capabilities and resources have expanded, we are now able to calculate Scopes 1, 2 and portions of Scope 3 across our entire operational footprint.

**C6.2**

---

**(C6.2) Describe your organization's approach to reporting Scope 2 emissions.**

**Row 1**

**Scope 2, location-based**

We are reporting a Scope 2, location-based figure

**Scope 2, market-based**

We are reporting a Scope 2, market-based figure

**Comment**

**C6.3**

---

**(C6.3) What were your organization's gross global Scope 2 emissions in metric tons CO2e?**

**Reporting year**

**Scope 2, location-based**

33012

**Scope 2, market-based (if applicable)**

18565

**Start date**

January 1 2021

**End date**

December 31 2021

**Comment**

**Past year 1**

**Scope 2, location-based**

29856

**Scope 2, market-based (if applicable)**

14353

**Start date**

January 1 2020

**End date**

December 31 2020

**Comment**

This is restated data. In previous years, we reported only the Scope 1 and 2 emissions associated with our Minneapolis campus. As our capabilities and resources have expanded, we are now able to calculate Scopes 1, 2 and portions of Scope 3 across our entire operational footprint.

**Past year 2**

**Scope 2, location-based**

32050

**Scope 2, market-based (if applicable)**

25468

**Start date**

January 1 2019

**End date**

December 31 2019

**Comment**

This is restated data. In previous years, we reported only the Scope 1 and 2 emissions associated with our Minneapolis campus. As our capabilities and resources have expanded, we are now able to calculate Scopes 1, 2 and portions of Scope 3 across our entire operational footprint.

**C6.4**

---

**(C6.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure?**

Yes

**C6.4a**

---

**(C6.4a) Provide details of the sources of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure.**

**Source**

On Nov. 8, 2021, Ameriprise announced the successful completion of the acquisition of BMO Financial Group's European-based asset management business (BMO GAM EMEA). This brought 14 new office sites into our operational control, which will account for approximately 3% of our total footprint. These sites were not included in our 2021 greenhouse gas emissions inventory.

**Relevance of Scope 1 emissions from this source**

Emissions excluded due to a recent acquisition or merger

**Relevance of location-based Scope 2 emissions from this source**

Emissions excluded due to a recent acquisition or merger

**Relevance of market-based Scope 2 emissions from this source (if applicable)**

Emissions excluded due to a recent acquisition or merger

**Explain why this source is excluded**

The acquisition was not complete until the middle of the fourth quarter in 2021, and some of the BMO locations will be divested and incorporated into our current Columbia Threadneedle offices. We expect to include any remaining BMO sites in our GHG emissions inventory in 2022.

**Estimated percentage of total Scope 1+2 emissions this excluded source represents**

<Not Applicable>

**Explain how you estimated the percentage of emissions this excluded source represents**

<Not Applicable>

---

**C6.5**

---

**(C6.5) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.**

**Purchased goods and services**

**Evaluation status**

Relevant, not yet calculated

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

**Capital goods**

**Evaluation status**

Relevant, not yet calculated

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

**Fuel-and-energy-related activities (not included in Scope 1 or 2)**

**Evaluation status**

Relevant, calculated

**Emissions in reporting year (metric tons CO2e)**

8400

**Emissions calculation methodology**

Average data method

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

0

**Please explain**

Emissions were calculated by applying Transmission & Distribution and Well-to-Tank emission factors to Ameriprise scope 1 and 2 data.

## Upstream transportation and distribution

### Evaluation status

Not evaluated

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

## Waste generated in operations

### Evaluation status

Relevant, not yet calculated

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

## Business travel

### Evaluation status

Relevant, calculated

### Emissions in reporting year (metric tons CO2e)

2100

### Emissions calculation methodology

Spend-based method  
Distance-based method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

85

### Please explain

Business air and rail travel data was provided by Ameriprise's travel provider, Carlson Wagonlit. Emissions were estimated based on distance travelled by travel type (air/rail). Business travel on land was calculated using spend data for car service/rentals, local transportation and taxi service. Emissions were estimated by applying EEIO factors to the spend data.

## Employee commuting

### Evaluation status

Relevant, calculated

### Emissions in reporting year (metric tons CO2e)

2761

### Emissions calculation methodology

Average data method

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

### Please explain

The commute data is based on the number of employees commuting in the ten largest Ameriprise offices, which was measured using average building occupancy. The top 10 sites cover approximately 85% of the total employee headcount. Employees at the remaining sites were excluded. The commute model was based on 2017 National Household Travel Survey with average 11.8 miles commute one way, and an assumption of 80% car usage and 20% rail transport usage.

## Upstream leased assets

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

Leased assets are included in our scope 1 or 2 inventory as part of our organizational boundary.

## Downstream transportation and distribution

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

There are no transportation and distribution emissions associated with Ameriprise products and services

## Processing of sold products

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

Ameriprise's business processes do not include processing of intermediate products

## Use of sold products

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

This doesn't apply to the products and services that Ameriprise sells.

## End of life treatment of sold products

### Evaluation status

Not relevant, explanation provided

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

There is no waste generated from the use of Ameriprise products and services at their end-of-life.

## Downstream leased assets

### Evaluation status

Not evaluated

### Emissions in reporting year (metric tons CO2e)

<Not Applicable>

### Emissions calculation methodology

<Not Applicable>

### Percentage of emissions calculated using data obtained from suppliers or value chain partners

<Not Applicable>

### Please explain

**Franchises**

**Evaluation status**

Relevant, not yet calculated

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

**Other (upstream)**

**Evaluation status**

Relevant, calculated

**Emissions in reporting year (metric tons CO2e)**

416

**Emissions calculation methodology**

Average data method

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

0

**Please explain**

This metric is the emissions associated with employees working from home. The number of employees working from home, and frequency, was determined using security data to calculate office occupancy levels, and assumptions made following the COVID-19 restrictions and office closures. The headcount information was incomplete and only covers about 86% of sites in 2021. Sites with no headcount information were excluded from the footprint. Emissions were estimated based on the number of employees working from home per main office, assumptions of average energy usage and IEA energy emission factors.

**Other (downstream)**

**Evaluation status**

**Emissions in reporting year (metric tons CO2e)**

<Not Applicable>

**Emissions calculation methodology**

<Not Applicable>

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**

<Not Applicable>

**Please explain**

**C6.5a**

---

**(C6.5a) Disclose or restate your Scope 3 emissions data for previous years.**

**Past year 1**

**Start date**

January 1 2020

**End date**

December 31 2020

**Scope 3: Purchased goods and services (metric tons CO2e)**

**Scope 3: Capital goods (metric tons CO2e)**

**Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)**  
6025

**Scope 3: Upstream transportation and distribution (metric tons CO2e)**

**Scope 3: Waste generated in operations (metric tons CO2e)**

**Scope 3: Business travel (metric tons CO2e)**  
2692

**Scope 3: Employee commuting (metric tons CO2e)**  
5488

**Scope 3: Upstream leased assets (metric tons CO2e)**

**Scope 3: Downstream transportation and distribution (metric tons CO2e)**

**Scope 3: Processing of sold products (metric tons CO2e)**

**Scope 3: Use of sold products (metric tons CO2e)**

**Scope 3: End of life treatment of sold products (metric tons CO2e)**

**Scope 3: Downstream leased assets (metric tons CO2e)**

**Scope 3: Franchises (metric tons CO2e)**

**Scope 3: Investments (metric tons CO2e)**  
<Not Applicable>

**Scope 3: Other (upstream) (metric tons CO2e)**  
345

**Scope 3: Other (downstream) (metric tons CO2e)**

**Comment**

Other upstream metric is the emissions associated with employees working from home.



**Past year 2**

**Start date**

January 1 2019

**End date**

December 31 2019

**Scope 3: Purchased goods and services (metric tons CO2e)**

**Scope 3: Capital goods (metric tons CO2e)**

**Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)**  
7083

**Scope 3: Upstream transportation and distribution (metric tons CO2e)**

**Scope 3: Waste generated in operations (metric tons CO2e)**

**Scope 3: Business travel (metric tons CO2e)**  
13679

**Scope 3: Employee commuting (metric tons CO2e)**  
13892

**Scope 3: Upstream leased assets (metric tons CO2e)**

**Scope 3: Downstream transportation and distribution (metric tons CO2e)**

**Scope 3: Processing of sold products (metric tons CO2e)**

**Scope 3: Use of sold products (metric tons CO2e)**

**Scope 3: End of life treatment of sold products (metric tons CO2e)**

**Scope 3: Downstream leased assets (metric tons CO2e)**

**Scope 3: Franchises (metric tons CO2e)**

**Scope 3: Investments (metric tons CO2e)**  
<Not Applicable>

**Scope 3: Other (upstream) (metric tons CO2e)**  
78

**Scope 3: Other (downstream) (metric tons CO2e)**

**Comment**

Other upstream metric is the emissions associated with employees working from home.

C6.10

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**(C6.10) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.**

**Intensity figure**

0.000001834

**Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)**

25418

**Metric denominator**

unit total revenue

**Metric denominator: Unit total**

13861000000

**Scope 2 figure used**

Market-based

**% change from previous year**

5.8

**Direction of change**

Increased

**Reason for change**

Our 2021 adjusted operating net revenue is \$13,861,000,000 and adjusted operating net revenue for 2020 is \$11,829,000,000. Prior to 2021, our intensity ratio reflected market-based emissions for our Minneapolis Headquarters and Client Service Center compared to total Ameriprise revenue. We were not able to break out Minneapolis-generated revenue. Therefore, this metric understated our intensity. When restating the intensity figure, using the newly calculated 2020 scope 1 and scope 2 market-based emissions from our all of our global operations (=20,495 for the metric numerator), the intensity figure for 2020 is 0.000001733 (rather than the 0.000001386 that was reported to CDP last year). With this restated intensity figure for 2020 (0.000001733), the actual percent change from 2020 to 2021 is a 5.8% increase. The reason for this change can be attributed to increased use of our facilities, resulting in increased fuel and energy consumption in 2021, as employees were returning to the office after the COVID-19 pandemic started to subside.

---

**Intensity figure**

1.56

**Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)**

25418

**Metric denominator**

full time equivalent (FTE) employee

**Metric denominator: Unit total**

16256

**Scope 2 figure used**

Market-based

**% change from previous year**

39.5

**Direction of change**

Decreased

**Reason for change**

Prior to 2021, this calculation was based on the total FTEs within the operational footprint of our Minneapolis campus, because we were only reporting Scope 1 and 2 emissions associated with our Minneapolis campus. Now that we are able to report Scope 1 and 2 emissions for our entire operational footprint, we are including FTEs from across the company, including corporate, subsidiary, and advisor employees. Therefore the 39.5 decrease in intensity is overstated. This intensity metric will be more useful going forward, as we are able to compare 2021 data to 2022.

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## C7. Emissions breakdowns

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### C7.9

**(C7.9) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?**

Increased

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### C7.9a

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**(C7.9a) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.**

	Change in emissions (metric tons CO2e)	Direction of change	Emissions value (percentage)	Please explain calculation
Change in renewable energy consumption	1057	Increased	5	In 2020 we purchased 22M kWh of Renewable Energy Certificates (RECs) to offset the energy consumption at our Minneapolis campus. In 2021, we purchased slightly fewer RECs, accounting for only 19.944M kWh of our total energy consumption in 2021. This difference can be attributed to an increase in 1,157 metric tons CO2e from 2020 to 2021.
Other emissions reduction activities		<Not Applicable>		
Divestment		<Not Applicable>		
Acquisitions		<Not Applicable>		
Mergers		<Not Applicable>		
Change in output	3866	Increased	19	The remaining increase in emissions can be attributed to increased use of our facilities in 2021, resulting in higher energy consumption, as employees began returning to the office after the COVID-19 pandemic.
Change in methodology		<Not Applicable>		
Change in boundary		<Not Applicable>		
Change in physical operating conditions		<Not Applicable>		
Unidentified		<Not Applicable>		
Other		<Not Applicable>		

**C7.9b**

**(C7.9b) Are your emissions performance calculations in C7.9 and C7.9a based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?**

Market-based

**C8. Energy**

**C8.1**

**(C8.1) What percentage of your total operational spend in the reporting year was on energy?**

More than 0% but less than or equal to 5%

**C8.2**

**(C8.2) Select which energy-related activities your organization has undertaken.**

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Yes
Consumption of purchased or acquired electricity	Yes
Consumption of purchased or acquired heat	No
Consumption of purchased or acquired steam	No
Consumption of purchased or acquired cooling	No
Generation of electricity, heat, steam, or cooling	No

**C8.2a**

**(C8.2a) Report your organization's energy consumption totals (excluding feedstocks) in MWh.**

	Heating value	MWh from renewable sources	MWh from non-renewable sources	Total (renewable and non-renewable) MWh
Consumption of fuel (excluding feedstock)	Unable to confirm heating value	0	1107.17	1107.17
Consumption of purchased or acquired electricity	<Not Applicable>	19944	56703.68	76647.68
Consumption of purchased or acquired heat	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of purchased or acquired steam	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of purchased or acquired cooling	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Consumption of self-generated non-fuel renewable energy	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Total energy consumption	<Not Applicable>	19944	57810.85	77754.85

**C8.2g**

**(C8.2g) Provide a breakdown of your non-fuel energy consumption by country.**

**Country/area**

United States of America

**Consumption of electricity (MWh)**

70485.09

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

70485.09

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

**Country/area**

India

**Consumption of electricity (MWh)**

5376.23

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

5376.23

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

**Country/area**

Austria

**Consumption of electricity (MWh)**

1

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

1

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

**Country/area**

Denmark

**Consumption of electricity (MWh)**

0.67

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

0.67

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

**Country/area**

France

**Consumption of electricity (MWh)**

18.41

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

18.41

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Germany

**Consumption of electricity (MWh)**

28.91

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

28.91

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Hong Kong SAR, China

**Consumption of electricity (MWh)**

17.09

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

17.09

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Italy

**Consumption of electricity (MWh)**

20.99

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

20.99

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Democratic People's Republic of Korea

**Consumption of electricity (MWh)**

12.31

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

12.31

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Luxembourg

**Consumption of electricity (MWh)**

22.98

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

22.98

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Netherlands

**Consumption of electricity (MWh)**

60.84

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

60.84

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Singapore

**Consumption of electricity (MWh)**

69.88

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

69.88

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Spain

**Consumption of electricity (MWh)**

75.7

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

75.7

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Sweden

**Consumption of electricity (MWh)**

2.41

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

2.41

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

---

**Country/area**

Switzerland

**Consumption of electricity (MWh)**

2.23

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

2.23

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

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**Country/area**

United Arab Emirates

**Consumption of electricity (MWh)**

11.59

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

11.59

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

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**Country/area**

United Kingdom of Great Britain and Northern Ireland

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**Consumption of electricity (MWh)**

441.29

**Consumption of heat, steam, and cooling (MWh)**

0

**Total non-fuel energy consumption (MWh) [Auto-calculated]**

441.29

**Is this consumption excluded from your RE100 commitment?**

<Not Applicable>

**C9. Additional metrics**

**C9.1**

**(C9.1) Provide any additional climate-related metrics relevant to your business.**

**C10. Verification**

**C10.1**

**(C10.1) Indicate the verification/assurance status that applies to your reported emissions.**

	Verification/assurance status
Scope 1	Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Third-party verification or assurance process in place
Scope 3	Third-party verification or assurance process in place

**C10.1a**

**(C10.1a) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.**

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

Ameriprise CY21 GHG Assurance Statement.pdf

**Page/ section reference**

1-2

**Relevant standard**

ISAE3000

**Proportion of reported emissions verified (%)**

100

**C10.1b**

**(C10.1b) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.**

**Scope 2 approach**

Scope 2 market-based

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

Ameriprise CY21 GHG Assurance Statement.pdf

**Page/ section reference**

1-2

**Relevant standard**

ISAE3000

**Proportion of reported emissions verified (%)**

100

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### C10.1c

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**(C10.1c) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.**

**Scope 3 category**

Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2)

Scope 3: Business travel

Scope 3: Employee commuting

**Verification or assurance cycle in place**

Annual process

**Status in the current reporting year**

Complete

**Type of verification or assurance**

Limited assurance

**Attach the statement**

Ameriprise CY21 GHG Assurance Statement.pdf

**Page/section reference**

1-2

**Relevant standard**

ISAE3000

**Proportion of reported emissions verified (%)**

100

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### C10.2

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**(C10.2) Do you verify any climate-related information reported in your CDP disclosure other than the emissions figures reported in C6.1, C6.3, and C6.5?**

No, we do not verify any other climate-related information reported in our CDP disclosure

### C11. Carbon pricing

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#### C11.2

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**(C11.2) Has your organization originated or purchased any project-based carbon credits within the reporting period?**

No

#### C11.3

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**(C11.3) Does your organization use an internal price on carbon?**

No, and we do not currently anticipate doing so in the next two years

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C12. Engagement

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C12.1

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**(C12.1) Do you engage with your value chain on climate-related issues?**

- Yes, our investees
- Yes, other partners in the value chain

C-FS12.1c

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**(C-FS12.1c) Give details of your climate-related engagement strategy with your investees.**

**Type of engagement**

Information collection (Understanding investee behavior)

**Details of engagement**

Climate-related criteria is integrated into investee evaluation processes

**% scope 3 emissions as reported in C-FS14.1a/C-FS14.1b**

**Investing (Asset managers) portfolio coverage**

**Investing (Asset owners) portfolio coverage**

**Rationale for the coverage of your engagement**

Engagement targeted at investees with increased climate-related risks

**Impact of engagement, including measures of success**

Building on our ESG integration and the collaboration between investment teams, our engagement approach covers a broad range of ESG issues, and climate issues are emphasized. Prioritization, planning and the scope for collaboration are important factors in shaping our engagement objectives and activities. The decision to intervene is prioritized based on our assessment of the significance of issues to the company, the risks to our clients, scope to effect change, and opportunities to collaborate. Given the fragmented nature of shareholder ownership we seek to work with our colleagues through industry networks and associations such as CA100+. During the most recent year we conducted 37 engagements where climate was the sole, or primary focus of the discussion, and dozens more where climate matters were among our engagement objectives. We voted against chairs of company boards for lagging climate adaptation practices, and supported dozens of shareholder proposals across a range of climate-related topics. We detail our results of several of our recent engagements with Energy sector companies in case studies in our RI Quarterly publications, which are available on our website at: <https://www.columbiathreadneedle.co.uk/en/inst/about-us/responsible-investment/> The acquisition of BMO Global Asset Management (EMEA) adds substantially to our Active Ownership capability, bringing a whole new team with extensive experience in engagement. We anticipate an increase in climate and net zero engagements going forward, both as a result of this additional resource, and also as a result of our Net Zero commitment.

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**Type of engagement**

Engagement & incentivization (changing investee behavior)

**Details of engagement**

Exercise active ownership

Support climate-related shareholder resolutions

Support climate-related issues in proxy voting

Initiate and support dialogue with investee boards to set Paris-aligned strategies

Encourage better climate-related disclosure practices among investees

Encourage investees to set a science-based emissions reduction target

**% scope 3 emissions as reported in C-FS14.1a/C-FS14.1b**

**Investing (Asset managers) portfolio coverage**

**Investing (Asset owners) portfolio coverage**

**Rationale for the coverage of your engagement**

Engagement targeted at investees with increased climate-related risks

**Impact of engagement, including measures of success**

At Columbia Threadneedle, we believe in the importance of being active and responsible owners. The moral hazard of boards and managements without effective shareholder oversight has resulted in various examples of destruction of shareholder value. As a result, targeted engagement on ESG issues, including climate-related matters, forms part of our stewardship activities, both as part of and extending our on-going dialogue with companies. We also believe that actively making voting decisions is an important right which we exercise regularly, and in collaboration with fund managers. Our overall stewardship is thus an extension of our investment process and service to clients. During the most recent year we conducted 37 engagements where climate was the sole, or primary focus of the discussion, and dozens more where climate matters were among our engagement objectives. We voted against chairs of company boards for lagging climate adaptation practices, and supported dozens of shareholder proposals across a range of climate-related topics. We detail our results of several of our recent engagements with Energy sector companies in case studies in our RI Quarterly publications, which are available on our website at: <https://www.columbiathreadneedle.co.uk/en/inst/about-us/responsible-investment/>. The acquisition of BMO Global Asset Management (EMEA) adds substantially to our Active Ownership capability, bringing a whole new team with extensive experience in engagement. We anticipate an increase in climate and net zero engagements going forward, both as a result of this additional resource, and also as a result of our Net Zero commitment.

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**Type of engagement**

Innovation & collaboration (changing markets)

**Details of engagement**

Carry out collaborative engagements with other investors or institutions

**% scope 3 emissions as reported in C-FS14.1a/C-FS14.1b**

**Investing (Asset managers) portfolio coverage**

**Investing (Asset owners) portfolio coverage**

**Rationale for the coverage of your engagement**

Engagement targeted at investees with increased climate-related risks

**Impact of engagement, including measures of success**

Given the fragmented nature of shareholder ownership we seek to work with our colleagues through industry networks and associations such as CA100+.

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C12.1d

**(C12.1d) Give details of your climate-related engagement strategy with other partners in the value chain.**

Our environmental stewardship reflects our ability to effectively measure, track and monitor our operational efficiency and GHG emissions. We maintain transparency by publishing information about our responsible use of resources, management of our energy-efficiency buildings, support of public transportation, waste-reduction efforts, and our approach to managing climate issues, and our responsible investment initiatives, in our annual Responsible Business Report (RBR). The RBR is available online, and our advisors have the opportunity to provide the report to their clients.

**C-FS12.2**

**(C-FS12.2) Does your organization exercise voting rights as a shareholder on climate-related issues?**

	Exercise voting rights as a shareholder on climate-related issues	Primary reason for not exercising voting rights as a shareholder on climate-related issues	Explain why you do not exercise voting rights on climate-related issues
Row 1	Yes	<Not Applicable>	<Not Applicable>

**C-FS12.2a**

**(C-FS12.2a) Provide details of your shareholder voting record on climate-related issues.**

**Method used to exercise your voting rights as a shareholder**

Exercise voting rights directly

**How do you ensure your shareholder voting rights are exercised in line with your overall climate strategy?**

<Not Applicable>

**Percentage of voting disclosed across portfolio**

99

**Climate-related issues supported in shareholder resolutions**

Climate transition plans  
Climate-related disclosures  
Aligning public policy position (lobbying)  
Emissions reduction targets  
Board oversight of climate-related issues

**Do you publicly disclose the rationale behind your voting on climate-related issues?**

Yes, for some

**C12.3**

**(C12.3) Does your organization engage in activities that could either directly or indirectly influence policy, law, or regulation that may impact the climate?**

**Row 1**

**Direct or indirect engagement that could influence policy, law, or regulation that may impact the climate**

Yes, we engage indirectly through trade associations

**Does your organization have a public commitment or position statement to conduct your engagement activities in line with the goals of the Paris Agreement?**

Yes

**Attach commitment or position statement(s)**

The attached position statement reflects the commitments made by our asset management business, Columbia Threadneedle. At the enterprise level, we have not publicly committed to conducting engagement activities in line with the goals of the Paris Agreement. As we learn from the work being done at Columbia Threadneedle, we will continue to evolve our climate strategy at Ameriprise.

Climate Change\_ Columbia Threadneedle Investments.pdf

**Describe the process(es) your organization has in place to ensure that your engagement activities are consistent with your overall climate change strategy**

For our asset management business, Columbia Threadneedle: We consider climate change to be one of the defining issues of our generation, and support the goals of the Paris agreement. We continue to evolve our research and data analytics, and engagement focus around climate change, acknowledging that there are meaningful risks but also investment opportunities to be captured in a world transitioning to net zero emissions. Central to our fundamental research of companies is an assessment of the credibility and achievability of a company's carbon transition plan. Columbia Threadneedle is a member of the Net Zero Asset Managers Initiative, a group of asset managers committed to supporting the goal of net zero greenhouse gas emissions by 2050 or sooner. We have developed a robust framework to measure and monitor carbon emissions. We are working to address the climate impact of both our own business activities and our invested assets, through close partnership with our clients and the companies we invest in. Our approach has a focus on real-world emissions reduction, engaging with companies to help them on their decarbonization journeys. Columbia Threadneedle is also a signatory to Climate Action 100+ (CA100+), a collaborative program seeking to ensure that the world's largest corporate greenhouse gas emitters take necessary action to combat climate change.

**Primary reason for not engaging in activities that could directly or indirectly influence policy, law, or regulation that may impact the climate**

<Not Applicable>

**Explain why your organization does not engage in activities that could directly or indirectly influence policy, law, or regulation that may impact the climate**

<Not Applicable>

**C12.3b**

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**(C12.3b) Provide details of the trade associations your organization engages with which are likely to take a position on any policy, law or regulation that may impact the climate.**

**Trade association**

Other, please specify (Investment Company Institute)

**Is your organization's position on climate change consistent with theirs?**

Mixed

**Has your organization influenced, or is your organization attempting to influence their position?**

Please select

**State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)**

The Investment Company Institute (ICI) has issued multiple press releases and statements about matters related to climate change. On June 7, 2021, ICI issued a press release in response to the SEC's call for input on climate change-related corporate disclosure. In the statement, ICI asked the SEC to require companies to disclose direct and indirect greenhouse gas emissions data, in order to give fund managers the consistent, comparable, and reliable data they need to better assess current and future sustainability-related risks. Additionally, the ICI Board of Governors also unanimously approved a statement on "Financing the Transition to Net Zero," on October 13, 2021, identifying specific actions the industry can take to facilitate the economic transition to net zero emissions and meet investors' objectives. The Board recognizes that private finance will play an important role in funding this transition. As participants in certain trade associations, we continually assess and contribute to the ongoing development of the organizations' positions on climate change and other relevant topics. We support the development of pragmatic industry positions and information sharing that contribute to (i) the industry's ability to provide clients with effective solutions to meet their objectives, both financial and non-financial; and (ii) enhance the quality of markets through the development of frameworks, such as on disclosure, that are proportionate and practical to meet the needs of investors, such as those aligned with TCFD.

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**

**Describe the aim of your organization's funding**

<Not Applicable>

**Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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**Trade association**

Other, please specify (The Investment Association)

**Is your organization's position on climate change consistent with theirs?**

Consistent

**Has your organization influenced, or is your organization attempting to influence their position?**

Please select

**State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)**

The Investment Association (IA) issued a Position on Climate Change on November 11, 2020. The document acknowledges climate change as "one of the single biggest systemic risks facing society and the planet today and outlines our industry commitment to climate action." The IA urges investment managers to take practical steps to Net Zero and a Paris-aligned future by: 1. Continuing to embed climate-related financial risks into investment processes and making full use of our rights and responsibilities as stewards of our clients' assets to support and challenge the companies in which we invest as they transition to Net Zero. 2. Improving transparency on the sustainability credentials of investment products to empower investors to make better informed decisions based on their own sustainability preferences. 3. Supporting the development of best practice, sharing knowledge and expertise 4. Helping UK government (1) to develop investable opportunities to transition to Net Zero, through the identification and implementation of sector-specific pathways to Transition; and (2) to further explore the issuance of green gilts. As participants in certain trade associations, we continually assess and contribute to the ongoing development of the organizations' positions on climate change and other relevant topics. We support the development of pragmatic industry positions and information sharing that contribute to (i) the industry's ability to provide clients with effective solutions to meet their objectives, both financial and non-financial; and (ii) enhance the quality of markets through the development of frameworks, such as on disclosure, that are proportionate and practical to meet the needs of investors, such as those aligned with TCFD.

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**

**Describe the aim of your organization's funding**

<Not Applicable>

**Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?**

Yes, we have evaluated, and it is aligned

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**Trade association**

Other, please specify (Securities Industry and Financial Markets Association)

**Is your organization's position on climate change consistent with theirs?**

Mixed

**Has your organization influenced, or is your organization attempting to influence their position?**

Please select

**State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)**

As part of a statement that SIFMA issued on March 21, 2021 in response to SEC's proposal to enhance and standardize climate-related disclosures for investors, SIFMA CEO stated: "We are supportive of material principles-based climate disclosures that deliver a balance of tailored disclosures and comparable quantitative information across registrants, while minimizing registrant compliance costs and ensuring a flexible disclosure regime that can meet evolving circumstances." As participants in certain trade associations, we continually assess and contribute to the ongoing development of the organizations' positions on climate change and other relevant topics. We support the development of pragmatic industry positions and information sharing that contribute to (i) the industry's ability to provide clients with effective solutions to meet their objectives, both financial and non-financial; and (ii) enhance the quality of markets through the development of frameworks, such as on disclosure, that are proportionate and practical to meet the needs of investors, such as those aligned with TCFD.

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**

**Describe the aim of your organization's funding**

<Not Applicable>

**Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?**

No, we have not evaluated

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**Trade association**

Business Roundtable

**Is your organization's position on climate change consistent with theirs?**

Mixed

**Has your organization influenced, or is your organization attempting to influence their position?**

Please select

**State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)**

From www.businessroundtable.org: "Business Roundtable believes corporations should lead by example, support sound public policies and drive the innovation needed to address climate change. To this end, the United States should adopt a more comprehensive, coordinated and market-based approach to reduce emissions. This approach must be pursued in a manner that ensures environmental effectiveness while fostering innovation, maintaining U.S. competitiveness, maximizing compliance flexibility and minimizing costs to business and society. International cooperation and diplomacy backed by a broadly supported U.S. policy will be the key to achieving the collective global action required to meet the scope of the challenge and position the U.S. economy for long-term success." As participants in certain trade associations, we continually assess and contribute to the ongoing development of the organizations' positions on climate change and other relevant topics. We support the development of pragmatic industry positions and information sharing that contribute to (i) the industry's ability to provide clients with effective solutions to meet their objectives, both financial and non-financial; and (ii) enhance the quality of markets through the development of frameworks, such as on disclosure, that are proportionate and practical to meet the needs of investors, such as those aligned with TCFD.

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**

**Describe the aim of your organization's funding**

<Not Applicable>

**Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?**

No, we have not evaluated

---

**Trade association**

US Chamber of Commerce

**Is your organization's position on climate change consistent with theirs?**

Mixed

**Has your organization influenced, or is your organization attempting to influence their position?**

Please select

**State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)**

The US Chamber of Commerce supports market-based solutions to reduce emissions and support U.S. competitiveness, national security, and American workers. As participants in certain trade associations, we continually assess and contribute to the ongoing development of the organizations' positions on climate change and other relevant topics. We support the development of pragmatic industry positions and information sharing that contribute to (i) the industry's ability to provide clients with effective solutions to meet their objectives, both financial and non-financial; and (ii) enhance the quality of markets through the development of frameworks, such as on disclosure, that are proportionate and practical to meet the needs of investors, such as those aligned with TCFD.

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**

**Describe the aim of your organization's funding**

<Not Applicable>

**Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?**

No, we have not evaluated

---

**Trade association**

Other, please specify (American Council of Life Insurers)

**Is your organization's position on climate change consistent with theirs?**

Mixed

**Has your organization influenced, or is your organization attempting to influence their position?**

Please select

**State the trade association's position on climate change, explain where your organization's position differs, and how you are attempting to influence their position (if applicable)**

The American Council of Life Insurers issued a public comment on the Department of the Treasury notice entitled "Federal Insurance Office Request for Information on the Insurance Sector and Climate-Related Financial Risks". The comment was posted on Nov. 16, 2021 at: <https://insurancenewsnet.com/oarticle/american-council-of-life-insurers-issues-public-comment-on-treasury-department-notice> As participants in certain trade associations, we continually assess and contribute to the ongoing development of the organizations' positions on climate change and other relevant topics. We support the development of pragmatic industry positions and information sharing that contribute to (i) the industry's ability to provide clients with effective solutions to meet their objectives, both financial and non-financial; and (ii) enhance the quality of markets through the development of frameworks, such as on disclosure, that are proportionate and practical to meet the needs of investors, such as those aligned with TCFD.

**Funding figure your organization provided to this trade association in the reporting year, if applicable (currency as selected in C0.4) (optional)**

**Describe the aim of your organization's funding**

<Not Applicable>

**Have you evaluated whether your organization's engagement with this trade association is aligned with the goals of the Paris Agreement?**

No, we have not evaluated

---

**(C12.4) Have you published information about your organization's response to climate change and GHG emissions performance for this reporting year in places other than in your CDP response? If so, please attach the publication(s).**

**Publication**

In voluntary sustainability report

**Status**

Complete

**Attach the document**

2022-responsible-business-report.pdf

**Page/Section reference**

Environmental Steward section - pages 26-28

**Content elements**

Governance  
Strategy  
Risks & opportunities  
Emissions figures

**Comment**

---

**Publication**

In other regulatory filings

**Status**

Complete

**Attach the document**

2022 Ameriprise Financial Proxy Statement.pdf

**Page/Section reference**

Managed our Business Responsibly - page 9

**Content elements**

Governance  
Strategy

**Comment**

---

**Publication**

In other regulatory filings

**Status**

Complete

**Attach the document**

Ameriprise-2021-Annual-Report.pdf

**Page/Section reference**

Pages 8, 26-27

**Content elements**

Governance  
Strategy  
Risks & opportunities

**Comment**

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**Publication**

In voluntary communications

**Status**

Complete

**Attach the document**

Responsible Investment \_ Columbia Threadneedle Investments US.pdf

**Page/Section reference**

See Climate Change tab for "Evolving climate insights"

**Content elements**

Governance  
Strategy  
Risks & opportunities

**Comment**

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**Publication**

In voluntary sustainability report

**Status**

---

Complete

**Attach the document**

j31863\_responsible\_business\_report\_emea\_2020-2021.pdf

**Page/Section reference**

pages 26-27

**Content elements**

Governance  
Strategy  
Risks & opportunities  
Emissions figures

**Comment**

C-FS12.5

**(C-FS12.5) Indicate the collaborative frameworks, initiatives and/or commitments related to environmental issues for which you are a signatory/member.**

	Environmental collaborative framework, initiative and/or commitment	Describe your organization's role within each framework, initiative and/or commitment
Row 1	CDP Signatory Cerrado Manifesto Climate Action 100+ Institutional Investors Group on Climate Change (IIGCC) International Corporate Governance Network (ICGN) Net Zero Asset Managers initiative Principle for Responsible Investment (PRI) Science Based Targets Network (SBTN) Task Force on Nature-related Financial Disclosures (TNFD) Transition Pathway Initiative	Through Columbia Threadneedle, we are members of a number of environmentally focused organizations and have adopted frameworks that address environmental impacts, including those on climate. For example, Threadneedle (now Columbia Threadneedle) is a founding member of the PRI, and in 2021 signed up to NZAMI. In addition, we acquired BMO GAM EMEA in Nov. 2021, and their climate-related engagement priorities include not only NZAMI, but also more focused initiatives. Information about these and other engagements can be found in the UK Stewardship Reports.

C14. Portfolio Impact

C-FS14.0

**(C-FS14.0) For each portfolio activity, state the value of your financing and insurance of carbon-related assets in the reporting year.**

**Lending to all carbon-related assets**

**Are you able to report a value for the carbon-related assets?**

Yes

**Value of the carbon-related assets in your portfolio (unit currency – as specified in C0.4)**

0

**New loans advanced in reporting year (unit currency – as specified in C0.4)**

0

**Total premium written in reporting year (unit currency – as specified in C0.4)**

<Not Applicable>

**Percentage of portfolio value comprised of carbon-related assets in reporting year**

0

**Primary reason for not providing a value for the financing and/or insurance to carbon-related assets**

<Not Applicable>

**Please explain why you are not providing a value for the financing and/or insurance to carbon-related assets and your plans for the future**

<Not Applicable>

#### Lending to coal

Are you able to report a value for the carbon-related assets?

Yes

Value of the carbon-related assets in your portfolio (unit currency – as specified in C0.4)

0

New loans advanced in reporting year (unit currency – as specified in C0.4)

0

Total premium written in reporting year (unit currency – as specified in C0.4)

<Not Applicable>

Percentage of portfolio value comprised of carbon-related assets in reporting year

0

Primary reason for not providing a value for the financing and/or insurance to carbon-related assets

<Not Applicable>

Please explain why you are not providing a value for the financing and/or insurance to carbon-related assets and your plans for the future

<Not Applicable>

#### Lending to oil and gas

Are you able to report a value for the carbon-related assets?

Yes

Value of the carbon-related assets in your portfolio (unit currency – as specified in C0.4)

0

New loans advanced in reporting year (unit currency – as specified in C0.4)

0

Total premium written in reporting year (unit currency – as specified in C0.4)

<Not Applicable>

Percentage of portfolio value comprised of carbon-related assets in reporting year

0

Primary reason for not providing a value for the financing and/or insurance to carbon-related assets

<Not Applicable>

Please explain why you are not providing a value for the financing and/or insurance to carbon-related assets and your plans for the future

<Not Applicable>

#### Investing in all carbon-related assets (Asset manager)

Are you able to report a value for the carbon-related assets?

Yes

Value of the carbon-related assets in your portfolio (unit currency – as specified in C0.4)

139087704000

New loans advanced in reporting year (unit currency – as specified in C0.4)

<Not Applicable>

Total premium written in reporting year (unit currency – as specified in C0.4)

<Not Applicable>

Percentage of portfolio value comprised of carbon-related assets in reporting year

19.59

Primary reason for not providing a value for the financing and/or insurance to carbon-related assets

<Not Applicable>

Please explain why you are not providing a value for the financing and/or insurance to carbon-related assets and your plans for the future

<Not Applicable>

#### Investing in coal (Asset manager)

Are you able to report a value for the carbon-related assets?

Yes

Value of the carbon-related assets in your portfolio (unit currency – as specified in C0.4)

208470000

New loans advanced in reporting year (unit currency – as specified in C0.4)

<Not Applicable>

Total premium written in reporting year (unit currency – as specified in C0.4)

<Not Applicable>

Percentage of portfolio value comprised of carbon-related assets in reporting year

0.03

Primary reason for not providing a value for the financing and/or insurance to carbon-related assets

<Not Applicable>

Please explain why you are not providing a value for the financing and/or insurance to carbon-related assets and your plans for the future

<Not Applicable>



#### Investing in oil and gas (Asset manager)

##### Are you able to report a value for the carbon-related assets?

Yes

##### Value of the carbon-related assets in your portfolio (unit currency – as specified in C0.4)

18877233000

##### New loans advanced in reporting year (unit currency – as specified in C0.4)

<Not Applicable>

##### Total premium written in reporting year (unit currency – as specified in C0.4)

<Not Applicable>

##### Percentage of portfolio value comprised of carbon-related assets in reporting year

2.66

##### Primary reason for not providing a value for the financing and/or insurance to carbon-related assets

<Not Applicable>

##### Please explain why you are not providing a value for the financing and/or insurance to carbon-related assets and your plans for the future

<Not Applicable>

#### Investing all carbon-related assets (Asset owner)

##### Are you able to report a value for the carbon-related assets?

No, but we plan to assess our portfolio's exposure in the next two years

##### Value of the carbon-related assets in your portfolio (unit currency – as specified in C0.4)

<Not Applicable>

##### New loans advanced in reporting year (unit currency – as specified in C0.4)

<Not Applicable>

##### Total premium written in reporting year (unit currency – as specified in C0.4)

<Not Applicable>

##### Percentage of portfolio value comprised of carbon-related assets in reporting year

<Not Applicable>

##### Primary reason for not providing a value for the financing and/or insurance to carbon-related assets

Other, please specify (We do capture the value of these assets within our owned asset portfolio, however we are not able to disclose this information at this time.)

##### Please explain why you are not providing a value for the financing and/or insurance to carbon-related assets and your plans for the future

We are not publicly disclosing these values at this time. However, the assessment of the exposures of the individual companies (and their transition plans) are inputs into whether we will invest in said companies. Our research process incorporates ESG aspects as a means to enhance our view into strategic direction, capital allocation and culture that are critical in the underwriting of corporate management teams. Specifically, the research team incorporates MSCI, Columbia Threadneedle proprietary ratings and ESG material factors into its fundamental analysis. These ratings and key ESG material factors supplement analyst credit metric tables incorporated in company and industry thesis statements. As it relates to climate change specifically, the material factors that are evaluated include but are not limited to WACI, TCFD Carbon-Related Assets, GHG emissions, biodiversity & land, and water usage.

#### Investing in coal (Asset owner)

##### Are you able to report a value for the carbon-related assets?

No, but we plan to assess our portfolio's exposure in the next two years

##### Value of the carbon-related assets in your portfolio (unit currency – as specified in C0.4)

<Not Applicable>

##### New loans advanced in reporting year (unit currency – as specified in C0.4)

<Not Applicable>

##### Total premium written in reporting year (unit currency – as specified in C0.4)

<Not Applicable>

##### Percentage of portfolio value comprised of carbon-related assets in reporting year

<Not Applicable>

##### Primary reason for not providing a value for the financing and/or insurance to carbon-related assets

Other, please specify (We do not have any companies active in coal extraction in our portfolios but some of our utilities still utilize thermal coal in their power plants. That usage is being phased out in the U.S.)

##### Please explain why you are not providing a value for the financing and/or insurance to carbon-related assets and your plans for the future

The assessment of the exposures of the individual companies (and their transition plans) are inputs into whether we will invest in said companies. Our research process incorporates ESG aspects as a means to enhance our view into strategic direction, capital allocation and culture that are critical in the underwriting of corporate management teams. Specifically, the research team incorporates MSCI, Columbia Threadneedle proprietary ratings and ESG material factors into its fundamental analysis. These ratings and key ESG material factors supplement analyst credit metric tables incorporated in company and industry thesis statements. As it relates to climate change specifically, the material factors that are evaluated include but are not limited to WACI, TCFD Carbon-Related Assets, GHG emissions, biodiversity & land, and water usage.

**Investing in oil and gas (Asset owner)**

**Are you able to report a value for the carbon-related assets?**

No, but we plan to assess our portfolio's exposure in the next two years

**Value of the carbon-related assets in your portfolio (unit currency – as specified in C0.4)**

<Not Applicable>

**New loans advanced in reporting year (unit currency – as specified in C0.4)**

<Not Applicable>

**Total premium written in reporting year (unit currency – as specified in C0.4)**

<Not Applicable>

**Percentage of portfolio value comprised of carbon-related assets in reporting year**

<Not Applicable>

**Primary reason for not providing a value for the financing and/or insurance to carbon-related assets**

Other, please specify (We do capture the value of these assets within our owned asset portfolio, however we are not able to disclose this information at this time.)

**Please explain why you are not providing a value for the financing and/or insurance to carbon-related assets and your plans for the future**

We are not publicly disclosing these values at this time. However, the assessment of the exposures of the individual companies (and their transition plans) are inputs into whether we will invest in said companies. Our research process incorporates ESG aspects as a means to enhance our view into strategic direction, capital allocation and culture that are critical in the underwriting of corporate management teams. Specifically, the research team incorporates MSCI, Columbia Threadneedle proprietary ratings and ESG material factors into its fundamental analysis. These ratings and key ESG material factors supplement analyst credit metric tables incorporated in company and industry thesis statements. As it relates to climate change specifically, the material factors that are evaluated include but are not limited to WACI, TCFD Carbon-Related Assets, GHG emissions, biodiversity & land, and water usage.

**C-FS14.1**

**(C-FS14.1) Does your organization measure its portfolio impact on the climate?**

	We conduct analysis on our portfolio's impact on the climate	Disclosure metric	Please explain why you do not measure the impact of your portfolio on the climate
Banking (Bank)	No, and we do not plan to do so in the next two years	<Not Applicable>	The vast majority of our Bank's investment portfolio is invested in structured assets, including mortgages. Columbia Threadneedle manages the portfolio and has extensive RI capabilities, including with regard to managing the risks and opportunities related to climate risk. However, there is no relevant data available for these asset classes. As the market matures and relevant data capabilities develop further, we will continue to evaluate our ability to assess the portfolio's impact.
Investing (Asset manager)	Yes	Portfolio emissions	<Not Applicable>
Investing (Asset owner)	Yes	Other carbon footprinting and/or exposure metrics (as defined by TCFD)	<Not Applicable>
Insurance underwriting (Insurance company)	<Not Applicable>	<Not Applicable>	<Not Applicable>

**C-FS14.1a**

**(C-FS14.1a) Provide details of your organization's portfolio emissions in the reporting year.**

**Investing (Asset manager)**

**Portfolio emissions (metric unit tons CO2e) in the reporting year**

26836882

**Portfolio coverage**

69.2

**Percentage calculated using data obtained from clients/investees**

0

**Emissions calculation methodology**

The Global GHG Accounting and Reporting Standard for the Financial Industry

**Please explain the details and assumptions used in your calculation**

This metric is the absolute scope 1 & 2 greenhouse gas emissions associated with our investments, scaled by the size of the investment. For example, if we own 5% of a company's total debt and equity, we would assign 5% of the company's scope 1 & 2 emissions to CTI's scope 3 emissions from investments category. To capture this information, we use a tool called Aladdin, which has been adapted to integrate corporate emissions data.

**C-FS14.1b**

**(C-FS14.1b) Provide details of the other carbon footprinting and/or exposure metrics used to track the impact of your portfolio on the climate.**

**Portfolio**

Investing (asset owner)

**Portfolio metric**

Weighted average carbon intensity (tCO2e/Million revenue)

**Metric value in the reporting year**

617.33

**Portfolio coverage**

45

**Percentage calculated using data obtained from clients/investees**

0

**Calculation methodology**

The calculation of WACI is done using a widely accepted methodology. WACI measures the carbon intensity of businesses, not its total carbon emissions. It is a calculation of the tonnes of CO2 emitted per US\$1 million of company sales. It then aggregates them using the percentage weight of the holding within the portfolio. The calculation includes only securities within the owned asset Riversource Consolidated portfolio that have relevant data. There is currently no RI data available in the marketplace for structured products. We would note that since 2018, our investment team has thoughtfully and strategically reduced the carbon intensity of the corporate bond allocation within the RiverSource Life portfolio while maintaining the overall portfolio's quality. RiverSource Life's portfolio is a large, well-established book with high-performing investments managed over many years. As changes are made to tactical allocations those decisions are informed by the Columbia Threadneedle's RI research. In fact, the reduction of the carbon intensity of the portfolio reflects not only portfolio management actions, but also the issuers' own steps to reduce their carbon footprint. Historical WACI of the portfolio: 6/28/22 562.62 12/31/21 617.33 12/31/20 772.84 12/31/19 838.44 12/31/18 980.79

**C-FS14.2**

**(C-FS14.2) Are you able to provide a breakdown of your organization's portfolio impact?**

	Portfolio breakdown	Please explain why you do not provide a breakdown of your portfolio impact
Row 1	None of the above, but we plan to do this in the next two years	For our managed assets, we use a tool called Aladdin, which has been adapted to integrate corporate emissions data. Currently we don't have the capability to provide a breakdown of the portfolio impact using this tool. For our owned assets, we don't currently provide a breakdown of our portfolio impact by any of the listed categories. However, as market and investor expectations evolve in this space, we may consider doing so in the next couple of years.

**C-FS14.3**

**(C-FS14.3) Did your organization take any actions in the reporting year to align your portfolio with a 1.5°C world?**

	Actions taken to align our portfolio with a 1.5°C world	Please explain why you have not taken any action to align your portfolio with a 1.5°C world
Banking (Bank)	No, and we do not plan to in the next two years	The vast majority of our Bank's investment portfolio is invested in structured assets, including mortgages. Columbia Threadneedle manages the portfolio and has extensive RI capabilities, including with regard to managing the risks and opportunities related to climate risk. However, there is no relevant data available for these asset classes. As the market matures and relevant data capabilities develop further, we will continue to evaluate our ability to align the portfolio with a 1.5 degree C world.
Investing (Asset manager)	Yes	<Not Applicable>
Investing (Asset owner)	Yes	<Not Applicable>
Insurance underwriting (Insurance company)	<Not Applicable>	<Not Applicable>

**C-FS14.3a**

**(C-FS14.3a) Does your organization assess if your clients/investees' business strategies are aligned with a 1.5°C world?**

	Assessment of alignment of clients/investees' strategies with a 1.5°C world	Please explain why you are not assessing if your clients/investees' business strategies are aligned with a 1.5°C world
Banking (Bank)	<Not Applicable>	<Not Applicable>
Investing (Asset manager)	Yes, for some	Companies included in our Net Zero strategies will be assessed for this.
Investing (Asset owner)	No, and we do not plan to in the next two years	We do not have the necessary data or resources to prioritize this.
Insurance underwriting (Insurance company)	<Not Applicable>	<Not Applicable>

**C15. Biodiversity**

### C15.1

**(C15.1) Is there board-level oversight and/or executive management-level responsibility for biodiversity-related issues within your organization?**

	Board-level oversight and/or executive management-level responsibility for biodiversity-related issues	Description of oversight and objectives relating to biodiversity	Scope of board-level oversight
Row 1	No, and we do not plan to have both within the next two years	<Not Applicable>	<Not Applicable>

### C15.2

**(C15.2) Has your organization made a public commitment and/or endorsed any initiatives related to biodiversity?**

	Indicate whether your organization made a public commitment or endorsed any initiatives related to biodiversity	Biodiversity-related public commitments	Initiatives endorsed
Row 1	Yes, we have endorsed initiatives only	<Not Applicable>	SDG Other, please specify (BMO GAM EMEA, now part of Columbia Threadneedle, supported TNFD and other initiatives in 2021.)

### C15.3

**(C15.3) Does your organization assess the impact of its value chain on biodiversity?**

	Does your organization assess the impact of its value chain on biodiversity?	Portfolio
Row 1	No, and we do not plan to assess biodiversity-related impacts within the next two years	<Not Applicable>

### C15.4

**(C15.4) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?**

	Have you taken any actions in the reporting period to progress your biodiversity-related commitments?	Type of action taken to progress biodiversity-related commitments
Row 1	Yes, we are taking actions to progress our biodiversity-related commitments	Other, please specify (The BMO GAM EMEA acquisition closed in November 2021, and we began the process to integrate it into Columbia Threadneedle.)

### C15.5

**(C15.5) Does your organization use biodiversity indicators to monitor performance across its activities?**

	Does your organization use indicators to monitor biodiversity performance?	Indicators used to monitor biodiversity performance
Row 1	No	Please select

### C15.6

**(C15.6) Have you published information about your organization's response to biodiversity-related issues for this reporting year in places other than in your CDP response? If so, please attach the publication(s).**

Report type	Content elements	Attach the document and indicate where in the document the relevant biodiversity information is located
Other, please specify (We acquired BMO GAM EMEA in November 2021. Their 2021 Stewardship Report includes information about their response to biodiversity-related issues.)	Content of biodiversity-related policies or commitments Governance Impacts on biodiversity Details on biodiversity indicators Influence on public policy and lobbying Risks and opportunities Biodiversity strategy	Pages 15-16, 18, 32, 40, 47, 68, 70, 81 BMO GAM stewardship-report-2021.pdf

### C16. Signoff

C-FI

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(C-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

C16.1

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(C16.1) Provide details for the person that has signed off (approved) your CDP climate change response.

	Job title	Corresponding job category
Row 1	Vice President, Corporate Communications	Other, please specify (Public Affairs)

FW-FS Forests and Water Security (FS only)

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FW-FS1.1

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(FW-FS1.1) Is there board-level oversight of forests- and/or water-related issues within your organization?

	Board-level oversight of this issue area	Explain why your organization does not have board-level oversight of this issue area and any plans to address this in the future
Forests	No, and we do not plan to in the next two years	
Water	No, and we do not plan to in the next two years	

FW-FS1.1c

---

(FW-FS1.1c) Does your organization have at least one board member with competence on forests- and/or water-related issues?

**Forests**

**Board member(s) have competence on this issue area**

Not assessed

**Criteria used to assess competence of board member(s) on this issue area**

<Not Applicable>

**Primary reason for no board-level competence on this issue area**

Judged to be unimportant, explanation provided

**Explain why your organization does not have at least one board member with competence on this issue area and any plans to address this in the future**

**Water**

**Board member(s) have competence on this issue area**

Not assessed

**Criteria used to assess competence of board member(s) on this issue area**

<Not Applicable>

**Primary reason for no board-level competence on this issue area**

Judged to be unimportant, explanation provided

**Explain why your organization does not have at least one board member with competence on this issue area and any plans to address this in the future**

FW-FS1.2

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**(FW-FS1.2) Provide the highest management-level position(s) or committee(s) with responsibility for forests- and/or water-related issues.**

**Name of the position(s) and/or committee(s)**

There is no management level responsibility for forests- and/or water-related issues

**Reporting line**

<Not Applicable>

**Issue area(s)**

<Not Applicable>

**Responsibility**

<Not Applicable>

**Coverage of responsibility**

<Not Applicable>

**Frequency of reporting to the board on forests- and/or water-related issues**

<Not Applicable>

**FW-FS2.1**

**(FW-FS2.1) Do you assess your portfolio's exposure to forests- and/or water-related risks and opportunities?**

	We assess our portfolio's exposure to this issue area	Explain why your portfolio's exposure is not assessed for this issue area and any plans to address this in the future
Banking - Forests exposure	Please select	<Not Applicable>
Banking – Water exposure	Please select	<Not Applicable>
Investing (Asset manager) – Forests exposure	Yes	<Not Applicable>
Investing (Asset manager) – Water exposure	Yes	<Not Applicable>
Investing (Asset owner) – Forests exposure	No, and we do not plan to in the next two years	
Investing (Asset owner) – Water exposure	No, and we do not plan to in the next two years	
Insurance underwriting – Forests exposure	<Not Applicable>	<Not Applicable>
Insurance underwriting – Water exposure	<Not Applicable>	<Not Applicable>

**FW-FS2.1a**

**(FW-FS2.1a) Describe how you assess your portfolio's exposure to forests- and/or water-related risks and opportunities.**

**Portfolio**

Investing (Asset manager)

**Exposure to**

Please select

**Type of risk management process**

A specific ESG-related risk management process

**Proportion of portfolio covered by risk management process**

**Type of assessment**

Qualitative only

**Time horizon(s) covered**

Please select

**Tools and methods used**

Please select

**Provide the rationale for implementing this process to assess your portfolio's exposure to forests- and/or water-related risks and opportunities**

**FW-FS2.2**

**(FW-FS2.2) Does your organization consider forests- and/or water-related information about clients/investees as part of its due diligence and/or risk assessment process?**

	We consider forests- and/or water-related information	Explain why information related to this issue area is not considered and any plans to address this in the future
Banking – Forests-related information	Please select	<Not Applicable>
Banking – Water-related information	Please select	<Not Applicable>
Investing (Asset manager) – Forests-related information	Please select	<Not Applicable>
Investing (Asset manager) – Water-related information	Please select	<Not Applicable>
Investing (Asset owner) – Forests-related information	Please select	<Not Applicable>
Investing (Asset owner) – Water-related information	Please select	<Not Applicable>
Insurance underwriting – Forests-related information	<Not Applicable>	<Not Applicable>
Insurance underwriting – Water-related information	<Not Applicable>	<Not Applicable>

**FW-FS2.3**

**(FW-FS2.3) Have you identified any inherent forests- and/or water-related risks in your portfolio with the potential to have a substantive financial or strategic impact on your business?**

	Risks identified for this issue area	Primary reason why your organization has not identified any substantive risks for this issue area	Explain why your organization has not identified any substantive risks for this issue area
Forests	No	Not yet evaluated	
Water	No	Not yet evaluated	

**FW-FS2.4**

**(FW-FS2.4) Have you identified any inherent forests- and/or water-related opportunities in your portfolio with the potential to have a substantive financial or strategic impact on your business?**

	Opportunities identified for this issue area	Primary reason why your organization has not identified any substantive opportunities for this issue area	Explain why your organization has not identified any substantive opportunities for this issue area
Forests	No	Not yet evaluated	
Water	No	Not yet evaluated	

**FW-FS3.1**

**(FW-FS3.1) Do you take forests- and/or water-related risks and opportunities into consideration in your organization’s strategy and/or financial planning?**

**Forests**

**Risks and opportunities related to this issue area taken into consideration in strategy and/or financial planning**

No, we do not take risks and opportunities into consideration

**Description of influence on organization’s strategy including own commitments**

<Not Applicable>

**Financial planning elements that have been influenced**

<Not Applicable>

**Description of influence on financial planning**

<Not Applicable>

**Explain why forests- and/or water-related risks and opportunities have not influenced your strategy and/or financial planning**

**Water**

**Risks and opportunities related to this issue area taken into consideration in strategy and/or financial planning**

No, we do not take risks and opportunities into consideration

**Description of influence on organization’s strategy including own commitments**

<Not Applicable>

**Financial planning elements that have been influenced**

<Not Applicable>

**Description of influence on financial planning**

<Not Applicable>

**Explain why forests- and/or water-related risks and opportunities have not influenced your strategy and/or financial planning**

FW-FS3.2

(FW-FS3.2) Has your organization conducted any scenario analysis to identify forests- and/or water-related outcomes?

**Forests**

**Scenario analysis conducted to identify outcomes for this issue area**

No, we have not conducted any scenario analysis to identify outcomes for this issue area, and we don't plan to in the next two years

**Type of scenario analysis used**

<Not Applicable>

**Parameters, assumptions, analytical choices**

<Not Applicable>

**Description of outcomes for this issue area**

<Not Applicable>

**Explain how the outcomes identified using scenario analysis have influenced your strategy**

<Not Applicable>

**Explain why your organization has not conducted scenario analysis for this issue area and any plans to address this in the future**

**Water**

**Scenario analysis conducted to identify outcomes for this issue area**

No, we have not conducted any scenario analysis to identify outcomes for this issue area, and we don't plan to in the next two years

**Type of scenario analysis used**

<Not Applicable>

**Parameters, assumptions, analytical choices**

<Not Applicable>

**Description of outcomes for this issue area**

<Not Applicable>

**Explain how the outcomes identified using scenario analysis have influenced your strategy**

<Not Applicable>

**Explain why your organization has not conducted scenario analysis for this issue area and any plans to address this in the future**

FW-FS3.3

(FW-FS3.3) Do any of your existing products and services enable clients to mitigate deforestation and/or water insecurity?

	Existing products and services that enable clients to mitigate deforestation and/or water insecurity	Explain why your organization does not offer products and services which enable clients to mitigate deforestation and/or water insecurity and any plans to address this in the future
Forests	No, and we do not plan to address this in the next two years	
Water	No, and we do not plan to address this in the next two years	

FW-FS3.4

(FW-FS3.4) Does the policy framework for the portfolio activities of your organization include forests- and/or water-related requirements that clients/investees need to meet?

	Policy framework includes this issue area	Explain why your organization does not include this issue area in the policy framework and any plans to address this in the future
Forests	Please select	<Not Applicable>
Water	Please select	<Not Applicable>

FW-FS3.5

(FW-FS3.5) Does your organization include covenants in financing agreements to reflect and enforce your forests- and/or water-related policies?

	Covenants included in financing agreements to reflect and enforce policies for this issue area	Explain how the covenants included in financing agreements relate to your policies for this issue area	Explain why your organization does not include covenants for this issue area in financing agreements and any plans to address this in the future
Forests	Please select	<Not Applicable>	<Not Applicable>
Water	Please select	<Not Applicable>	<Not Applicable>

FW-FS4.1



**(FW-FS4.1) Do you engage with your clients/investees on forests- and/or water-related issues?**

	We engage with clients/investees on this issue area	Explain why you do not engage with your clients/investees on the issue area and any plans to address this in the future
Clients – Forests	Please select	<Not Applicable>
Clients – Water	Please select	<Not Applicable>
Investees – Forests	Please select	<Not Applicable>
Investees – Water	Please select	<Not Applicable>

**FW-FS4.2**

**(FW-FS4.2) Does your organization exercise its voting rights as a shareholder on forests- and/or water-related issues?**

	We exercise voting rights as a shareholder on this issue area	Issues supported in shareholder resolutions	Give details of the impact your voting has had on this issue area	Explain why your organization does not exercise voting rights on this issue area and any plans to address this in the future
Forests	Please select	<Not Applicable>	<Not Applicable>	<Not Applicable>
Water	Please select	<Not Applicable>	<Not Applicable>	<Not Applicable>

**FW-FS4.3**

**(FW-FS4.3) Does your organization provide financing and/or insurance to smallholders in the agricultural commodity supply chain?**

	Provide financing and/or insurance to smallholders in the agricultural commodity supply chain	Agricultural commodity	Primary reason for not providing finance and/or insurance to smallholders	Explain why your organization does not provide finance/insurance to smallholders and any plans to change this in the future
Row 1	Please select	<Not Applicable>	<Not Applicable>	<Not Applicable>

**FW-FS4.4**

**(FW-FS4.4) Does your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may impact forests and/or water security?**

	Direct or indirect engagement that could influence policy, law, or regulation that may impact this issue area	Primary reason for not engaging in activities that could directly or indirectly influence policy, law, or regulation that may impact this issue area	Explain why you do not engage in activities that could directly or indirectly influence policy, law, or regulation that may impact this issue area
Forests	No, and we do not plan to in the next two years	Judged to be unimportant	
Water	No, and we do not plan to in the next two years	Judged to be unimportant	

**FW-FS5.1**

**(FW-FS5.1) Does your organization measure its portfolio impact on forests and/or water security?**

	We measure our portfolio impact on this issue area	Explain how your organization measures its portfolio impact on this issue area, including any metrics used to quantify impact	Primary reason for not measuring portfolio impact on this issue area	Explain why your organization does not measure its portfolio impact on this issue area and any plans to change this in the future
Banking – Impact on Forests	Please select	<Not Applicable>	<Not Applicable>	<Not Applicable>
Banking – Impact on Water	Please select	<Not Applicable>	<Not Applicable>	<Not Applicable>
Investing (Asset manager) – Impact on Forests	Please select	<Not Applicable>	<Not Applicable>	<Not Applicable>
Investing (Asset manager) – Impact on Water	Please select	<Not Applicable>	<Not Applicable>	<Not Applicable>
Investing (Asset owner) – Impact on Forests	No, and we don't plan to in the next two years	<Not Applicable>	Lack of tools or methodologies available	
Investing (Asset owner) – Impact on Water	No, and we don't plan to in the next two years	<Not Applicable>	Lack of tools or methodologies available	
Insurance underwriting – Impact on Forests	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>
Insurance underwriting – Impact on Water	<Not Applicable>	<Not Applicable>	<Not Applicable>	<Not Applicable>

**FW-FS5.2**

**(FW-FS5.2) Does your organization provide finance or insurance to companies operating in any stages of the following forest risk commodity supply chains, and are you able to report on the amount of finance/insurance provided?**

	Finance or insurance provided to companies operating in the supply chain for this commodity	Amount of finance/insurance provided will be reported	Explain why your organization is unable to report on the amount of finance/insurance provided for this commodity
Lending to companies operating in the timber products supply chain	Please select	<Not Applicable>	<Not Applicable>
Lending to companies operating in the palm oil products supply chain	Please select	<Not Applicable>	<Not Applicable>
Lending to companies operating in the cattle products supply chain	Please select	<Not Applicable>	<Not Applicable>
Lending to companies operating in the soy supply chain	Please select	<Not Applicable>	<Not Applicable>
Lending to companies operating in the rubber supply chain	Please select	<Not Applicable>	<Not Applicable>
Lending to companies operating in the cocoa supply chain	Please select	<Not Applicable>	<Not Applicable>
Lending to companies operating in the coffee supply chain	Please select	<Not Applicable>	<Not Applicable>
Investing (asset manager) to companies operating in the timber products supply chain	Please select	<Not Applicable>	<Not Applicable>
Investing (asset manager) to companies operating in the palm oil products supply chain	Please select	<Not Applicable>	<Not Applicable>
Investing (asset manager) to companies operating in the cattle products supply chain	Please select	<Not Applicable>	<Not Applicable>
Investing (asset manager) to companies operating in the soy supply chain	Please select	<Not Applicable>	<Not Applicable>
Investing (asset manager) to companies operating in the rubber supply chain	Please select	<Not Applicable>	<Not Applicable>
Investing (asset manager) to companies operating in the cocoa supply chain	Please select	<Not Applicable>	<Not Applicable>
Investing (asset manager) to companies operating in the coffee supply chain	Please select	<Not Applicable>	<Not Applicable>
Investing (asset owner) to companies operating in the timber products supply chain	Please select	<Not Applicable>	<Not Applicable>
Investing (asset owner) to companies operating in the palm oil products supply chain	Please select	<Not Applicable>	<Not Applicable>
Investing (asset owner) to companies operating in the cattle products supply chain	Please select	<Not Applicable>	<Not Applicable>
Investing (asset owner) to companies operating in the soy supply chain	Please select	<Not Applicable>	<Not Applicable>
Investing (asset owner) to companies operating in the rubber supply chain	Please select	<Not Applicable>	<Not Applicable>
Investing (asset owner) to companies operating in the cocoa supply chain	Please select	<Not Applicable>	<Not Applicable>
Investing (asset owner) to companies operating in the coffee supply chain	Please select	<Not Applicable>	<Not Applicable>
Insuring companies operating in the timber products supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Insuring companies operating in the palm oil products supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Insuring companies operating in the cattle products supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Insuring companies operating in the soy supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Insuring companies operating in the rubber supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Insuring companies operating in the cocoa supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>
Insuring companies operating in the coffee supply chain	<Not Applicable>	<Not Applicable>	<Not Applicable>

**FW-FS6.1**

(FW-FS6.1) Have you published information about your organization's response to forests- and/or water-related issues for this reporting year in places other than in your CDP response? If so, please attach the publication(s).

**Publication**

No publications

**Status**

<Not Applicable>

**Attach the document**

<Not Applicable>

**Page/Section reference**

<Not Applicable>

**Content elements**

<Not Applicable>

**Comment**

<Not Applicable>

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Submit your response

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**In which language are you submitting your response?**

English

**Please confirm how your response should be handled by CDP**

	I understand that my response will be shared with all requesting stakeholders	Response permission
Please select your submission options	Yes	Public

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