# Ally Financial Inc - Climate Change 2021



# CO. Introduction

# C0.1

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

Ally Financial Inc. (NYSE: ALLY) is a digital f nancial services company committed to its promise to "Do It Right" for its consumer, commercial and corporate customers. Ally is composed of an industry-leading independent auto f nance and insurance operation, an award-winning digital direct bank (Ally Bank, Member FDIC and Equal Housing Lender, which offers mortgage lending, point-of-sale personal lending, and a variety of deposit and other banking products), a corporate f nance business for equity sponsors and middle-market companies, and securities brokerage and investment advisory services. A relentless ally for all things money, Ally helps people save well and earn well, so they can spend for what matters.

Our primary business lines are Dealer Financial Services, which is composed of our Automotive Finance and Insurance operations, Mortgage Finance, and Corporate Finance. Corporate and O ther primarily consists of centralized corporate treasury activities, the management of our legacy mortgage portfolio, the activity related to Ally Invest and Ally Lending (our unsecured personal-lending business unit), and reclassif cations and eliminations between the reportable operating segments. Ally Bank's assets and operating results are included within our Automotive Finance, Mortgage Finance, and Corporate Finance segments, as well as Corporate and O ther, based on its underlying business activities. As of December 31, 2020, Ally Bank had total assets of \$172.0 billion, and total nonaff liate deposits of \$137.0 billion.

Be (Even) Better —our internal mantra to never stop improving and never stop growing —is the foundation for our strategic objectives, which are centered around (1) differentiating our company as a relentless ally for consumer, commercial, and corporate customers, (2) ensuring our culture remains aligned with a focus on our customers, communities, employees, and stockholders, (3) ongoing optimization of our market leading automotive, insurance, and digitally-based bank business lines, (4) sustained growth in customers and ongoing relationship deepening across our scalable platforms, and expanded product offerings, and (5) eff cient capital deployment and disciplined risk management. At Ally we understand that we can go fast alone, but to go far, we must go together — when each of us are committed to be a little better every day, we are able to make the world better for all of us.

Additional information may also be found at https://www.ally.com/

C0.2

# 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
Chief Executive Off cer (CEO)	As a digital bank with no brick-and-mortar branches, Ally inherently has a lower carbon footprint and reduced environmental impact than traditional branch based f nancial institutions. However, we recognize we can contribute more to the effort to achieve environmental sustainability. In 2020, we made the decision to accelerate our current environmental sustainability efforts beyond our facilities and work to develop a comprehensive strategy that strengthens the link between our social and environmental initiatives. This strategy is currently under development. As part, we plan to incorporate a more comprehensive governance structure of board-level oversight, which will include reviewing, advising management on and monitoring performance against Ally's strategic plans and objectives, while considering Ally's risk appetite, resources and

Position of individual(s)	Please explain
O ther C-Suite Off cer	As a digital bank with no brick-and-mortar branches, Ally inherently has a lower carbon footprint and reduced environmental impact than traditional branch based f nancial institutions. However, we recognize we can contribute more to the effort to achieve environmental sustainability. In 2020, we made the decision to accelerate our current environmental sustainability efforts beyond our facilities and work to develop a comprehensive strategy that m em 6 a ond efficiency environmented not in the effort of the environmental sustainability efforts beyond our facilities and work to develop a comprehensive strategy that m em 6 a ond efficiency environmented not effort of the environmented of the env

Frequency with which climate- related issues are a scheduled		

Name of the position(s) and/or committee(s)	Reporting line	Responsibility	Coverage of responsibility	Frequency of reporting to the board on clmate- related issues
O ther C-Suite Off cer, please specify (Chief Administrative Off cer)	CEO reporting line	Both assessing and managing climate-related risks and opportunities	Risks and opportunities related to our ownoperations	Not reported to the board

# C1.2a

(C1.2a) Describe where in the organizational structure this/these position(s) and/or committees lie, what their associated responsibilities are, and how climaterelated issues are monitored (do not include the names of individuals).

# Environmental Sustainability

Currently, Ally does not have a designated committee or other leadership group specifically tasked with oversight of our environmental sustainability efforts. Environmental sustainability came into greater focus in the second half of 2019 and throughout 2020 as a result of several developments: 1) recognition of the importance for Ally to better understand, prepare for and take timely preventive action against, potentially material climate change impacts, 2) increasing investor demand for consistent and comparable climate change data to accurately evaluate investments, 3) changing Federal policy focus as a result of rejoining the Paris Climate Agreement and an increase in regulatory discussion about potential requirements and oversight, and 4) a recognition that Ally's commitment to "Do It Right" extends to the conservation of environmental resources to ensure a sustainable future for our customers, employees, shareholders and the communities in which we live and operate. In the future, Ally intends to specifically target environmental sustainability issues as part of our overall strategic plan and measure performance on sustainability measures against the strategic plan.

## Environmental Risk and Reporting

The Board, including the Risk Committee of the Board, executive management, and business line leaders identify risks to the business generally, including climate-related risks that are believed to be material to the business. Ally has identif ed and disclosed risks relating to certain climate matters and expects that those risks and disclosures will evolve over time as new information becomes available and to the extent that such risks become more or less material to the business. In 2019, Ally began to more holistically and deliberately incorporate ESG considerations into our enterprise risk management framework, with an initial focus on social sustainability. This effort continued into 2020, including the development of an internal Social Risk Forum comprised of business line and support function risk leaders tasked with analyzing emerging risks in the ESG space. At the end of 2020, we introduced climate-related risk as a specif citem on our Social Risk Forum agenda and those discussions continued into 2021, focusing on greater data collection, aggregation and analysis, with the goal of aligning with the recommendations from the Task Force on Climate-related Financial Disclosures (TCFD) in assessing and reporting on our exposures to climate-related risks and opportunities consistently with the f nancial industry.

Within specif c business lines, certain climate-rela	ated risks are regularly mo	onitored. For	instance, in cor	nection with our	Property &
Cassualty (P&C) Insurance business line, whatchM	<b>Be</b> e,	R	M n.s	R ann@e wit	ance busi

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es (PML). The P&C Insurance business line also manages acute physical climate-related risks through a loss mitigation process. This process includes monitoring dealer locations to determine whether they are in the forecasted path of an ensuing hurricane/storm and working with dealers to notify and relocate vehicles to a safer location.

# 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
Row1	No, not currently but we plan to introduce them in the next two years	

	From (years)	To (years)	Comment
Long-term	3	10	Ally is currently assessing how to better integrate environmental sustainability
			objectives and opportunities into our strategic planning and forecasting process.
			How we define our time horizons may shift once this assessment is completed.

# C2.1b

At Ally, operational risk is defined as the risk of loss or harm arising from inadequate or failed processes or systems, human factors, or external events (e.g., an extreme weather event). An operational risk meets the definition of a substantive financial or strategic risk when it is expected to be more than the benefits accrued by the business plan and poses a material risk to Ally's financial performance priorities, capital adequacy, reputation, regulatory standing or ability to execute our strategy. There are five quantifiable indicators used to determine when an operational risk has a substantive financial or strategic impact: net operational losses, issues past due, critical and high-risk third-party services on a performance improvement plan, voluntary turnover, and business continuity testing.

# C2.2

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

#### Value chain stage(s) covered

**Direct operations** 

#### **Risk management process**

A specif c climate-related risk management process

#### Frequency of assessment

Annually

#### Time horizon(s) covered

Short-term

## **Description of process**

In 2020, Ally developed and implemented two facility energy management practices questionnaires. The f rst questionnaire is sent annually to our property management partners and the second questionnaire is for our Ally facility managers. These questionnaires were designed to assess Ally's current state regarding energy consumption at our facilities and to identify opportunities to increase energy eff ciency. As part of this assessment, Ally Corporate Workplace Partners (CWP) will annually assess current state practices and opportunities for implementing future energy eff ciency practices. Based on the responses, the CWP team will consider future energy eff ciency practices for implementation.

Value chain stage(s) covered Direct operations

#### Risk management process

A specif c climate-related risk management process

Frequency of assessment

Annually

Time horizon(s) covered

Short-term

# **Description of process**

As part of how Ally P&C Insurance manages climate-related physical risk, our actuarial pricing analysis incorporates projected weather losses to allow us to properly and adequately price for insured risks. Changes in frequency or severity of weather events are ref ected in these loss projections. Our underwriting team also evaluates and adjusts policy terms and conditions as necessary based on changes in loss experience (e.g. increasing weather aggregate deductibles in areas where projected losses from weather are increasing). Catastrophe Modeling estimates weather-related annualized average losses (AAL) and probable maximum losses (PML). AAL is used as a reference for P&C pricing.

C2.2a

	Portfolio Coverage	Assessment Type	Description
Bank lending (Bank)	Not applicable	Not applicable	Notapplicable
Investing (Asset			

	We assess the portfolio's exposure	Portfolio coverage	Please explain
Bank lending (Bank)	No we don't assess this	Not applicable	Ally is expanding its risk assessment processes, climate related data gathering and reporting framework, with a goal of aligning its climate risk evaluation and reporting with recommendations of the TCFD and evolving industry standards.
Investing (Asset manager)	No we don't assess this	Not applicable	Ally is expanding its risk assessment processes, climate related data gathering and reporting framework, with a goal of aligning its climate risk evaluation and reporting with recommendations of the TCFD and evolving industry standards.
Investing (Asset owner)	No we don't assess this	Not applicable	Ally is expanding its risk assessment processes, climate related data gathering and reporting framework, with a goal of aligning its climate risk evaluation and reporting with recommendations of the TCFD and evolving industry standards.
Insurance underwriting (Insurance company)	No we don't assess this	Not applicable	Ally is expanding its risk assessment processes, climate related data gathering and reporting framework, with a goal of aligning its climate risk evaluation and reporting with recommendations of the TCFD and evolving industry standards.
O ther products and services, please specify	Not applicable	Not applicable	

# C-FS2.2f

(C-FS2.2f) Do you request climate-related information from your clients/investees as part of your due diligence and/or risk assessment practices?

	We request climate related information	Please explain
Bank lending (Bank)	No, but we plan to do so in the next two years	Ally recognizes that climate change-related risk assessment practices are increasingly important to the f nancial services industry. As governmental entities and industry groups have become increasingly focused on the effects of climate change and related environmental issues, they are beginning to develop a common methodology to request climate related information from clients and assess and report such information. In the future, as such methodologies are adopted, we are planning on requesting climate related information from ourclients, consistent with industry standards. As Ally progresses with the development of its Enterprise Sustainability Strategy, each Business Line based on their client type, will implement these efforts in a way that's consistent with their business model and risk assessment practices, while coordinating with the

	We request climate related information	Please explain
Investing (Asset manager)	No, but we plan to do so in the next two years	Ally recognizes that climate change-related risk assessment practices are increasingly important to the f nancial services industry. As governmental entities and industry groups have become increasingly focused on the effects of climate change and related environmental issues, they are beginning to develop a common methodology to request climate related information from clients and assess and report such information. In the future, as such methodologies are adopted, we are planning on requesting climate related information from ourclients, consistent with industry standards. As Ally progresses with the development of its Enterprise Sustainability Strategy, each Business Line based on their client type, will implement these efforts in a way that's consistent with their business model and risk assessment practices, while coordinating with the Sustainability Off ce to conf rm alignment with the overarching enterprise strategy.
Investing (Asset owner)	No, but we plan to do so in the next two years	Ally recognizes that climate change-related risk assessment practices are increasingly important to the f nancial services industry. As governmental entities and industry groups have become increasingly focused on the effects of climate change and related environmental issues, they are beginning to develop a common methodology to request climate related information from clients and assess and report such information.

(C2.3b) Why do you not consider your organization to be exposed to climate-related risks with the potential to have a substantive

	Primary reason	Please explain
Row1	Evaluation in progress	

C3.1			
Yes			

# C3.1b

(C3.1b) Does your organization intend to publish a low-carbon transition plan in the next two years?

	Intention to publish a low carbon transition plan	Intention to include the transition plan as a scheduled resolution item at Annual General Meetings (AGMs)	Comment
Row1	No, we do not intend to publish a low- carbon transition plan in the next two years	Not applicable	We are currently working on identifying opportunities for Ally to facilitate the transition to a low carbon economy. In the upcoming years we intend to develop a low-carbon transition plan; however, at this time we are not able to forecast when the plan will be complete for publication.

C3.2

(C-FS3.7) Are climate-related issues factored into your external asset manager selection process?

No, for none of our externally managed assets

# C-FS3.7b

## (C-FS3.7b) Why are climate-related issues not factored into your external asset manager selection process?

Ally is currently in the process of evaluating the recommendations from the Task Force on Climate-related Financial Disclosures, to develop our strategy to best factor climate related issues into our external manager selection process. In 2021, we plan to assess our current climate related footprint and climate related risks and opportunities, using the TCFD lens. With this information we intend to begin performing climate related scenario analyses, either qualitative or quantitative, to inform our strategy which we will ultimately incorporate into the policy framework of our organization.

# 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

Primary reason	5 year forecast	Please explain
Row1 We are planning to introduce a target in the next two years	As 2020 was the f rst year that Ally performed a quantitative emissions inventory, we are not able to state whether we have been trending in a def ned direction over the past several years. As a digital bank with no brick-and- mortar branches, Ally inherently has a lower carbon footprint and reduced environmental impact than traditional branch based f nancial institutions. As we begin to better understand the impact of our direct and indirect operational activities, we will pursue setting an emissions target with a projected reduction in emissions, consistent with Paris Agreement targets to keep average global temperature increases below 2 degrees Celsius over pre- industrial levels.	In 2020, Ally made the decision to accelerate our current environmental efforts beyond our facilities and work to develop a comprehensive strategy that strengthens the link between our social and environmental initiatives. We began gathering data to assess our Scope 1, Scope 2, and Scope 3 emissions in 2020. With this information, in 2021 we will be performing a portfolio-level inventory to assess our baseline emissions. With this inaugural emissions calculation we will then begin to track our emissions to identify and assess business line trends. We plan to incorporate this quantitative information into our climate strategy, which will result in setting an emissions target and predictive forecasting of emissions over a f ve-year cycle.

# C4.2

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

Other climate related target(s)

# C4.2b

# Target reference number Oth 1

Year target was set 2017

Target coverage

Company-wide

# Target type: absolute or intensity

Intensity

# Target type: category & Metric (target numerator if reporting an intensity target)

Low carbon buildings	Percentage of buildings with a green building certif cate
Low car borr bandings	r creentage of bandings with a green banding certificate

# Target denominator (intensity targets only)

square foot

Base year

2017

Figure or percentage in base year 20.5

Target year 2023

#### Figure or percentage in target year

30

# Figure or percentage in reporting year 24.8

% of target achieved [auto-calculated] 45.2631578947368

Target status in reporting year Underway

Is this target part of an emissions target? No, it is not part of an emissions target.

Is this target part of an overarching initiative? No, it's not part of an overarching initiative

# Please explain (including target coverage)

Ally recognizes that where we choose to work matters. That is why we have begun to identify opportunities to lease LEED-certif ed off ce space throughout our regional portfolio of facilities. Our current goal is to achieve 30 percent of our total facility portfolio under LEED-certif cation by 2023. We are on track to achieve this goal. In addition, during 2020, we worked towards understanding how our leased building operations impact and contribute to our sustainability goals. This process has led us to creating a framework for bi-annual performance reports and analyses for our facility energy consumption. To do so, we are leveraging a questionnaire to

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

7321

# Comment

At this time, Ally does not purchase emissions offsets or renewable energy certif cates. The market-based emissions were calculated using utility emission factors (when available) and residual mix emission factors.

# C5.2

(C5.2) 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) The Greenhouse Gas Protocol: Scope 2 Guidance US EPA Emissions & Generation Resource Integrated Database (eGRID)

# 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)

4375

Start date

<Not Applicable>

End date

<Not Applicable>

# Comment

# 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 f gure

#### Scope 2, market-based

We are reporting a Scope 2, market-based f gure

# Comment

At this time, Ally does not purchase emissions offsets or renewable energy certif cates. The market-based emissions were calculated using utility emission factors (when available) and residual mix emission factors.

# 16.3

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

Reporting year Scope 2, location-based

7822

Scope 2, market-based (if applicable)

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

Emissions are not relevant

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

No emissions excluded

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

No emissions excluded

# Explain why this source is excluded

As these vehicles account for less than two percent of Ally's leased vehicle feet, this source has been determined to be not relevant.

# 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, calculated

Metric tonnes CO2e

195082

## Emissions calculation methodology

Ally assessed our procurement spends of purchased goods and services. We utilized the EPA Supply Chain Greenhouse Gas Emission Factors for US Industries and Commodities to calculate the associated emissions from these purchases.

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

0

## Please explain

Ally Financial performed a portfolio-level screening to identify which Scope 3 activities throughout the value chain were relevant and material. We selected the World Resources Institute (WRI) Scope 3 Evaluator tool to quantitatively estimate Ally's Scope 3 GHG emissions footprint. The results of this screening estimated the size of this Scope 3 category exceed our inventory boundary threshold; therefore, this category is relevant.

Capital goods

Evaluation status

Not relevant, calculated

Metric tonnes CO2e

27694

## Emissions calculation methodology

therefore, this category is not relevant.

# Processing of sold products

#### **Evaluation status**

Not relevant, explanation provided

Metric tonnes 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

As a f nancial services company, Ally Financial does not produce physical products. Therefore, this category is not relevant to our Scope 3 emissions.

#### Downstream leased assets

Evaluation status Not relevant, explanation provided

#### Metric tonnes CO2e

<NotApplicable>

#### Emissions calculation methodology

<Not Applicable>

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

<Not Applicable>

#### Please explain

Ally Financial does not own and lease assets to other entities; therefore, this category is not relevant to our Scope 3 emissions.

#### Franchises

# Evaluation status

Not relevant, explanation provided

# Metric tonnes 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

Ally Financial does not operate any franchises; therefore, this category is not relevant to our Scope 3 emissions.

#### Other (upstream)

## **Evaluation status**

## Metric tonnes 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 (downstream)

**Evaluation status** 

Metric tonnes CO2e

<NotApplicable>

Emissions calculation methodology

<Not Applicable>

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

<Not Applicable>

Please explain

# C6.10

(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.

## 0.0000018204

Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e) 12197

Metric denominator

unit total revenue

Metric denominator: Unit total

670000000

Location-based

% change from previous year

<Not Applicable>

## Reason for change

Not applicable as 2020 is Ally's inaugural emissions inventory.

#### 0.0000017456

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

11696

# Metric denominator

unit total revenue

# Metric denominator: Unit total

670000000

Market-based

% change from previous year

# Direction of change

<Not Applicable>

# Reason for change

Not applicable as 2020 is Ally's inaugural emissions inventory.

# 1.28

Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e) 12197

Metric denominator full time equivalent (FTE) employee

Metric denominator: Unit total 9500

# Location-based

% change from previous year

**Direction of change** 

<Not Applicable>

Reason for change

Not applicable as 2020 is Ally's inaugural emissions inventory.

# 1.23

Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e) 11696

Metric denominator

full time equivalent (FTE) employee

# Metric denominator: Unit total

9500

Market-based

# % change from previous year

## Direction of change

<Not Applicable>

Reason for change

Not applicable as 2020 is Ally's inaugural emissions inventory.

# C7. Emissions breakdowns

# 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?

This is our first year of reporting, so w M

Scope 1	No third-party verif cation or assurance	
Scope 2 (location-based or market-based)	No third-party verif cation or assurance	
Scope 3	No third-party verif cation or assurance	

# C10.2

# in C6.1, C6.3, and C6.5?

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

In 2021, we plan to continue our commitment to improving the environment. We plan to align our processes with the

#### (C-FS12.5) Are you a signatory of any climate-related collaborative industry frameworks, initiatives and/or commitments?

	Industry collaboration	Comment
Reporting framework	Please select	
Industry initiative	Please select	
Commitment	Please select	

# C14. Portfolio Impact

# C-FS14.1

## (C-FS14.1) Do you conduct analysis to understand how your portfolio impacts the climate? (Scope 3 portfolio impact)

	We conduct analysis on our portfolio's impact on the climate	Disclosure metric	Comment
Bank lending (Bank)	No, but we plan to do so in the next two years	<not applicable=""></not>	
Investing (Asset manager)	No, but we plan to do so in the next two years	<not applicable=""></not>	
Investing (Asset owner)	No, but we plan to do so in the next two years	<not applicable=""></not>	
Insurance underwriting (Insurance company)	No, but we plan to do so in the next two years	<not applicable=""></not>	
O ther products and services, please specify	Notapplicable	<not applicable=""></not>	

# C-FS14.1c

## (C-FS14.1c) Why do you not conduct analysis to understand how your portfolio impacts the climate? (Scope 3 Category 15 "Investments" emissions or alternative carbon footprinting and/or exposure metrics)

In 2020, we prepared to collect the data required for Scope 1, 2 and 3 emissions calculations. In 2021, we performed a portfolio-level screening process to identify which of our Scope 3 activities throughout the value chain were relevant and material. We selected the World Resources Institute (WRI) Scope 3 Evaluator tool to quantitatively estimate Ally's Scope 3 GHG emissions footprint. The results of this screening indicated that category 15, investments, was both relevant and material to Ally. We plan to implement further analysis of this category using the recently published Partnership for Financial Accounting methodology in future years. We will continue to look for datadriven solutions to reduce emissions and evolve our strategies accordingly.

# C-FS14.3

## (C-FS14.3) Are you taking actions to align your portfolio to a well below 2-degree world?

	We are taking actions to align our portfolio to a well below 2-degree world	Please explain
O ther products and services,	Notapplicable	
please specify		

# C15. Signoff

C-FI

# C15.1

(C15.1) Provide details for the person that has signed off (approved) your CDP climate change response.

	Job title	Corresponding job category
Rowone	Chief Risk Off cer	Chief Risk Off cer (CRO)

# Submit your response

In which language are you submitting your response?

English

	I am submitting to	Public or Non-Public Submission
I am submitting my response	Investors	Public

I have read and accept the applicable Terms