Wells Fargo & Company - Climate Change 2019

C0. Introduction

C0.1

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

Wells Fargo & Company (NYSE: WFC) is a diversified, community-based financial services company with $1.9 trillion in assets. Wells Fargo's vision is to satisfy our customers’ financial needs and help them succeed financially. Founded in 1852 and headquartered in San Francisco, Wells Fargo provides banking, investment and mortgage products and services, as well as consumer and commercial finance, through 7,600 locations, more than 13,000 ATMs, the internet (wellsfargo.com) and mobile banking, and has offices in 32 countries and territories to support customers who conduct business in the global economy. With approximately 263,000 team members, Wells Fargo serves one in three households in the United States. Wells Fargo & Company was ranked No. 29 on Fortune’s 2019 rankings of America’s largest corporations. (July 16, 2019)

C0.2

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

<table>
<thead>
<tr>
<th>Start date</th>
<th>End date</th>
<th>Indicate if you are providing emissions data for past reporting years</th>
<th>Select the number of past reporting years you will be providing emissions data for</th>
</tr>
</thead>
<tbody>
<tr>
<td>Row 1</td>
<td>January 1 2018</td>
<td>December 31 2018</td>
<td>No</td>
</tr>
</tbody>
</table>

C0.3

(C0.3) Select the countries/regions for which you will be supplying data.

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 consolidation approach to your Scope 1 and Scope 2 greenhouse gas inventory.

Operational control

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.

<table>
<thead>
<tr>
<th>Position of individual(s)</th>
<th>Please explain</th>
</tr>
</thead>
<tbody>
<tr>
<td>Director on board</td>
<td>As provided under its charter, the Corporate Responsibility Committee (CRC) of Wells Fargo’s Board of Directors has primary oversight for Wells Fargo’s policies, programs, and strategies regarding social and public responsibility matters of significance to the Company and the public at large, including environmental issues and sustainability, human rights, and other social and public matters of significance to the Company. The Board of Directors carries out its risk oversight responsibilities directly and through the work of its seven standing committees, including its Risk Committee. The Risk Committee oversees company-wide risks and the Company’s Corporate Risk function, and plays an active role in approving and overseeing the Company’s risk management framework.</td>
</tr>
</tbody>
</table>

C1.1b

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

<table>
<thead>
<tr>
<th>Frequency with which climate related issues are a scheduled agenda item</th>
<th>Governance mechanisms into which climate related issues are integrated</th>
<th>Please explain</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other, please specify (At least annually and more frequently as needed)</td>
<td>Other, please specify (Oversight of policies, programs, and strategies regarding social responsibility matters of significance to the Company and the public at large, including environmental issues)</td>
<td>At least annually, the Corporate Responsibility Committee of the Board of Directors receives reports on environmental sustainability, including the status of progress made against Wells Fargo’s environmental and climate commitment goals, recognition on environmental issues, the Company’s Environmental and Social Risk Management (ESRM) Policy and practices, and operational sustainability. Management also provides periodic updates on various corporate responsibility and sustainability matters, including the Corporate Responsibility Report and other corporate responsibility and non-financial reporting, and the results of periodic materiality assessments conducted by Wells Fargo.</td>
</tr>
</tbody>
</table>

C1.2

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

<table>
<thead>
<tr>
<th>Name of the position(s) and/or committee(s)</th>
<th>Responsibility</th>
<th>Frequency of reporting to the board on climate related issues</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chief Sustainability Officer (CSO)</td>
<td>Both assessing and managing climate-related risks and opportunities</td>
<td>Annually</td>
</tr>
</tbody>
</table>

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

The rationale for assigning climate-related responsibilities to the Chief Sustainability Officer (CSO) is to have a centralized point of accountability for the topic. The CSO reports to the head of Stakeholder Relations, who reports to the Chief Executive Officer. The CSO and her team work across the enterprise to help influence respective climate goals. Examples of the CSO’s team’s efforts include working with our:

- Supply chain to integrate a climate lens into procurement activities.
- Facilities management team to establish climate-related goals, which has led to meeting all of our electricity needs with 100% renewable energy.
- Environmental and Social Risk Management (ESRM) Team (responsible for evaluating transactions in high-carbon industries and which reports to the CSO) to help ensure transactions are in alignment with the company objective to help accelerate a transition to a low-carbon economy.

C1.3

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

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).

<table>
<thead>
<tr>
<th>Who is entitled to benefit from these incentives?</th>
<th>Chief Sustainability Officer (CSO)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Types of incentives</td>
<td>Monetary reward</td>
</tr>
<tr>
<td>Activity incentivized</td>
<td>Emissions reduction project</td>
</tr>
<tr>
<td>Comment</td>
<td></td>
</tr>
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<td>Activity incentivized</td>
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<td></td>
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<tr>
<td>---------------------</td>
<td>-----------------------</td>
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<td>Monetary reward</td>
<td>Energy reduction target</td>
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Chief Sustainability Officer (CSO)

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<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monetary reward</td>
<td>Efficiency project</td>
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<td></td>
</tr>
</tbody>
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<th>Activity incentivized</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monetary reward</td>
<td>Behavior change related indicator</td>
<td></td>
</tr>
</tbody>
</table>

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Chief Sustainability Officer (CSO)

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<th>Activity incentivized</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monetary reward</td>
<td>Environmental criteria included in purchases</td>
<td></td>
</tr>
</tbody>
</table>

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Chief Sustainability Officer (CSO)

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<tr>
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<th>Activity incentivized</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monetary reward</td>
<td>Supply chain engagement</td>
<td></td>
</tr>
</tbody>
</table>

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Chief Sustainability Officer (CSO)

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<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monetary reward</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Activity incentivized
Other, please specify (Sustainable finance commitments)

Comment

C2. Risks and opportunities

C2.1

(C2.1) Describe what your organization considers to be short-, medium- and long-term horizons.

<table>
<thead>
<tr>
<th>From (years)</th>
<th>To (years)</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Short-term</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>Medium-term</td>
<td>2</td>
<td>5</td>
</tr>
<tr>
<td>Long-term</td>
<td>5</td>
<td>10</td>
</tr>
</tbody>
</table>

C2.2

(C2.2) Select the option that best describes how your organization's processes for identifying, assessing, and managing climate-related issues are integrated into your overall risk management.

Integrated into multi-disciplinary company-wide risk identification, assessment, and management processes

C2.2a

(C2.2a) Select the options that best describe your organization's frequency and time horizon for identifying and assessing climate-related risks.

<table>
<thead>
<tr>
<th>Frequency of monitoring</th>
<th>How far into the future are risks considered?</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Row 1</td>
<td>Six-monthly or more frequently</td>
<td>&gt;6 years</td>
</tr>
</tbody>
</table>

C2.2b
(C2.2b) Provide further details on your organization’s process(es) for identifying and assessing climate-related risks.

We are working to implement TCFD recommendations for disclosing risks and opportunities associated with climate change. Efforts include representatives from various lines of business across our company. Consideration and implementation of TCFD recommendations will help us ensure we have thoroughly identified and assessed climate-related risks and opportunities.

Risks

At an asset-level, individual Lines of Businesses (LOBs) serve as the first line of defense in identifying risks. The Front line identifies, manages, and mitigates risks. Managing risk effectively in the Front line is critical to strong risk management for accountability and early issue identification. For example, in adherence to companywide Environmental and Social Risk Management (ESRM) policy, there is an environmental and social risk section in all underwriting memos for coal and metal mining, oil and gas, and arms and armaments transactions. The ESRM team not only is responsible for the analysis of portfolio-related environmental and social risk exposure in these areas, but also the development and evolution of new policies to address risks beyond currently covered sectors. Additionally, our LOBs conduct a carbon risk analysis that is included in the primary underwriting memo at least annually for all utility borrowers engaged in the production, generation, transmission and distribution of electricity. Related to our own operations, in 2018 we commissioned a study to understand the physical risks of climate change on our most critical facilities including data centers, operations centers, and facilities with large number of team members.

At a company-level, Independent Risk Management (IRM), which consists of the Corporate Risk function, is our second line of defense. IRM establishes, implements, and maintains the Company’s Risk Management Program under the direction of the Board’s Risk Committee and senior management, and oversees the Front line’s execution of its risk management responsibilities and independently and credibly challenges Front line risk decisions. This includes implementation of our ESRM policy that aims to flag reputational, environmental, and social issues for review by our underwriters. Where risks are high, enhanced due diligence and credit approval would apply.

Our sustainability materiality assessment, through which the Company gains feedback from internal and external stakeholders, helps us identify both asset- and company-level risks. For example, as a result of this process we are considering recommendations from Sustainability Accounting Standards Board (SASB) and have begun implementation of TCFD recommendations.

Opportunities

Asset-level opportunities are identified by internal LOBs; working groups such as the upcoming TCFD working group, and the sustainable finance work stream, formed to identify and advance opportunities such as green bonds, renewable energy procurement; and by individual team members who are encouraged to identify opportunities in their business units or through our idea builder portal.

At a company-level, opportunities are identified via market research, and via our sustainability materiality assessment, which gains feedback from internal and external stakeholders. This feedback covers a wide range of risks and opportunities and has contributed to the setting of our 100% renewable energy goal. The feedback has also triggered a more thorough evaluation of our climate-related scenario analysis, which can further surface both risks and opportunities at both asset- and company-levels.

C2.2c
## (C2.2c) Which of the following risk types are classified in your organization’s climate-related risk assessments?

<table>
<thead>
<tr>
<th>Relevance &amp; Inclusion</th>
<th>Please explain</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Current regulation</strong></td>
<td>Relevant, always included</td>
</tr>
<tr>
<td><strong>Emerging regulation</strong></td>
<td>Relevant, always included</td>
</tr>
<tr>
<td><strong>Technology</strong></td>
<td>Relevant, always included</td>
</tr>
<tr>
<td><strong>Legal</strong></td>
<td>Relevant, always included</td>
</tr>
<tr>
<td><strong>Market</strong></td>
<td>Relevant, always included</td>
</tr>
<tr>
<td><strong>Reputation</strong></td>
<td>Relevant, always included</td>
</tr>
<tr>
<td><strong>Acute physical</strong></td>
<td>Relevant, always included</td>
</tr>
<tr>
<td><strong>Chronic physical</strong></td>
<td>Relevant, always included</td>
</tr>
<tr>
<td><strong>Upstream</strong></td>
<td>Relevant, always included</td>
</tr>
<tr>
<td><strong>Downstream</strong></td>
<td>Relevant, sometimes included</td>
</tr>
</tbody>
</table>
(C2.2d) Describe your process(es) for managing climate-related risks and opportunities.

The Board has ultimate responsibility for overseeing Wells Fargo’s risk management strategy. The Board carries out its risk oversight responsibilities directly and via its seven standing committees; all of which report to the full Board. The Sustainability and Corporate Responsibility team is tasked with managing climate-related risks and opportunities, and reports to the Corporate Responsibility Committee (CRC) of the Board at least annually.

Risks and opportunities related to climate change are prioritized based on the likelihood and significance of financial, environmental, as well as social impacts, and reputational risk considerations. We also have engaged in regular sustainability materiality assessments every three to five years since 2013, including external stakeholder engagements to help refine the company’s prioritization of sustainability issues. This has resulted in a climate strategy that prioritizes (i) operational considerations, (ii) community considerations, and (iii) products and services-related issues, e.g. financed emissions. In 2018, we committed to implementing the TCFD recommendations, which will help us further assess and manage climate-related risks and opportunities.

Physical

- In 2018, we commissioned a study to understand the physical risks of climate change on our most critical facilities including data centers, operations centers, and facilities with large number of team members. Initial findings indicate that while we do not face any material risk from the physical impacts of climate change, there are a number of individual risks to specific sites associated with intense precipitation, inadequate storm water capacity, access to adequate water and electricity (particularly during severe heat events), and competition for key resources (such as fuel or water deliveries) during acute events. Much of this risk can be mitigated through improved coordination with suppliers and municipal authorities, enhanced information provision to facility staff, augmented contracting and process improvements; all of which will be implemented and monitored for success.
- Recognition of risks associated with the impacts of climate change has led to the validation of our diversified business model. Our company, including team members, customers, facilities, and operations are geographically distributed with locations across the United States and worldwide. We also maintain backup systems intended to ensure business continuation in case one system is impacted. This helps us avoid risks that could occur if we were otherwise located in a singular location that was highly susceptible to acute physical risks of climate change.
- Opportunities to help our customers affected by impacts of climate change have led us to invest in emergency response vehicles, teams, and emergency response processes. Wells Fargo has increased capacity for community resiliency, and has established a Resilient Communities grant program to address climate adaptation. In 2018, Wells Fargo provided $20.0 million to foster resilient communities. This generates community goodwill, and also helps to mitigate future impacts.

Transitional

Opportunities associated with the transition to a low-carbon economy has led us to establish a $200 billion sustainable finance goal, as well as maintain internal teams of expertise that specialize in financing for renewable energy and clean technology. In 2018, recognition of transition risks associated with climate change has led us to:

- Participate in a study with peers to evaluate how select climate-related scenarios could affect the credit quality of upstream and downstream oil and gas companies
- Include environmental sustainability expertise on our Stakeholder Advisory Council
- Formalize a transaction escalation process, elevating go or no-go decision-making to senior leadership level when significant environmental or social risks, including climate and transitional risks, are potentially present
- Develop a proprietary environmental and social rating tool to assess companies for their capacity to navigate the low-carbon transition and address climate-related risks and opportunities
- Lead internal, ESRM team-led, training opportunities for issues such as climate change, environmental and social risk, and ESRM practices and procedures
- Enhance our carbon asset risk models to account for changing state renewable standards and cost of carbon
- Directly engage with customers on financial, social, and environmental risks related to climate issues
- Reduce our exposure to coal mining commitments by more than 87.6% since 2012.
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 1

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

Risk type
Transition risk

Primary climate-related risk driver
Policy and legal: Other

Type of financial impact
<Not Applicable>

Company- specific description
Uncertainty surrounding new regulation can affect customers’ ability to repay loans if they invest in technologies that become obsolete in an unpredictable regulatory environment. Global agreements were established as a result of COP21; however there remains a lack of clear, consistent global and national regulations associated with climate change. Individual cities, states, and countries are establishing varying forms of regulations or policy changes associated with climate change.

Time horizon
Current

Likelihood
More likely than not

Magnitude of impact
Low

Are you able to provide a potential financial impact figure?
Yes, a single figure estimate

Potential financial impact figure (currency)
94000000

Potential financial impact figure – minimum (currency)
<Not Applicable>

Potential financial impact figure – maximum (currency)
<Not Applicable>

Explanation of financial impact figure
The figure shows the 2018 revenue at risk associated with companies engaged in sensitive energy-related activities that may be most directly affected by potential transition risk in the sector. We will continue to engage with external stakeholders and key partners to refine our methodology and disclosure. To obtain these figures, we have narrowed the overall energy portfolio to just the relationships that are associated with (i) more sensitive types of energy activity, and (ii) higher internal environmental and social risk ratings from our Environmental Social and Risk Management team (ESRM). The higher internal risk ratings serve in part as a proxy for the company’s ability to navigate regulatory uncertainty around climate issues, and help identify the portion of revenue that could most likely be affected over the short and medium time horizons.

Management method
We maintain a diversified portfolio of customers in a diversity of industries, thereby enabling us to mitigate risks associated with shocks. Where some customers may be heavily impacted, others may realize gains. ESRM team prioritizes engaging with clients around their environmental and social (E&S) performance, particularly in sensitive sectors and when greater risks are present.
ESRM team reviewed 320 oil and gas customers in 2018 and engaged in direct conversations with many of these customers on climate change commitments and related expectations. ESRM also works with industry associations, e.g., Association of Oil Pipelines, to directly educate the entire member base on our expectations for performance. Focusing on the ‘higher risk’ names within this subgroup of our portfolio allows us to: (i) engage clients that pose the most significant E&S risks to communities, (ii) address areas of financing that most directly contribute to reputational risk to Wells Fargo, (iii) strengthen critical areas of our portfolio to improve Wells Fargo resilience to E&S risks over medium and longer term time horizons, and (iv) work with clients to improve their performance and increase access to capital/minimize operational issues due to E&S topics. Cost of management is integrated into existing budgets. It is estimated based on calculating estimate of cost, which is less than 0.01% of our total salaries; then multiplying it by total salaries, which were more than $17.8 billion in 2018.

**Cost of management**

178000000

**Comment**

**Identifier**

Risk 2

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

Direct operations

**Risk type**

Physical risk

**Primary climate-related risk driver**

Acute: Increased severity of extreme weather events such as cyclones and floods

**Type of financial impact**

Increased capital costs (e.g., damage to facilities)

**Company- specific description**

Our business, financial, accounting, data processing systems or other operating systems and facilities may stop operating properly or become disabled or damaged as a result of severe tropical cyclones or storms. Our business operations may be adversely affected by significant and widespread disruption to our physical infrastructure or operating systems that support our businesses and customers.

**Time horizon**

Current

**Likelihood**

About as likely as not

**Magnitude of impact**

Low

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

Yes, a single figure estimate

**Potential financial impact figure (currency)**

50000000

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

<Not Applicable>

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

<Not Applicable>

**Explanation of financial impact figure**

There were no reportable weather related losses in our 2018 SEC filings. Our allowance for credit losses on Sept. 30, 2017, included $450 million for coverage of our preliminary estimate of potential hurricane-related losses. As noted in our Q1 2018 Form 10-Q, the estimate for 2017 hurricane-related losses was reduced by $400 million. The 2017 amount is used here to provide context of the size of potential losses due to weather-related events.

**Management method**

In 2018, we commissioned formal study to better understand physical risks of climate change on our properties both now and in the long-term. The study can further improve our current management methods, including: 1) We are reducing our absolute greenhouse gas emissions and thereby contributing to the overall reduction needed to address climate change. 2) We employ experts and have established business units dedicated to supporting a low-carbon economy. 3) We have extensive business continuity plans in place to mitigate damages and associated costs. Through careful planning, we attempt to account for the safety
of our team members, reduce operational downtime and help customers. 4) The diversity of our business, with respect to revenue generation and geography, helps us mitigate damages from weather-related events. We can maintain downed operations from other locations. 5) We are investing in capacity building and conservation projects that can help our communities better prepare for weather-related events. Cost of management is integrated into existing budgets. It is estimated based on calculating estimate of cost, which is less than 0.01% of our total salaries, and then multiplying it by total salaries, which were more than $17.8 billion in 2018 as reported in our annual report.

**Cost of management**
178000000

**Comment**

<table>
<thead>
<tr>
<th>Identifier</th>
<th>Risk 3</th>
</tr>
</thead>
</table>

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

**Risk type**
Physical risk

**Primary climate-related risk driver**
Chronic: Changes in precipitation patterns and extreme variability in weather patterns

**Type of financial impact**
Reduced revenues from lower sales/output

**Company-specific description**
Change in precipitation extremes and droughts can impact our customers. For example, droughts can drive up the cost of water and thereby affect our customers' ability to payback their loans, especially if they are in in water intensive industries such as agriculture, semiconductors, energy, select tourism, breweries and beverage companies and more.

**Time horizon**
Current

**Likelihood**
More likely than not

**Magnitude of impact**
Low

**Are you able to provide a potential financial impact figure?**
Yes, a single figure estimate

**Potential financial impact figure (currency)**
76000000

**Potential financial impact figure – minimum (currency)**
<Not Applicable>

**Potential financial impact figure – maximum (currency)**
<Not Applicable>

**Explanation of financial impact figure**
The revenue at risk figure provided is tied to the relationships with companies most directly affected by potential physical climate risk issues, in the energy sector. We have developed a pilot methodology this year to focus our disclosure on energy relationships, and will continue to engage with external stakeholders and key partners to refine our methodology. To obtain these figures, we have narrowed the overall energy portfolio to just the relationships that are associated with (i) the types of energy activity more directly affected by extreme variability in precipitation and weather patterns, and (ii) higher internal environmental and social risk ratings from our Environmental and Social Risk Management (ESRM) team. The higher internal risk ratings serve in part as a proxy for the company's ability to respond to physical climate issues, and help identify the portion of revenue that could most likely be affected over the short and medium time horizons.

**Management method**
Our diversified portfolio of customers in a broad diversity of industries helps enable us to mitigate risks associated with shocks. Where some customers may be heavily impacted, other may realize gains. Our ESRM team prioritizes engaging with clients around their environmental and social (E&S) performance, particularly in sensitive sectors and when greater risks are present. ESRM team reviewed 320 oil and gas customers in 2018, and engaged in direct conversations with many of these customers on climate change commitments and related expectations. ESRM also works with industry associations, to directly educate members on our
expectations for performance. Focusing on the higher risk names within this subgroup of our portfolio allows us to most efficiently: • Engage clients that pose E&S risks to communities • Address areas of financing that most directly contribute to reputational risk • Strengthen critical areas of our portfolio to improve Wells Fargo's resilience to E&S risks • Work with clients to improve their performance and increase access to capital/minimize operational issues due to E&S topics. Cost of management is estimated to be about $3.5 million in philanthropy through our Resilient Communities grant program. Other cost of management is integrated into existing budgets. It is estimated based on calculating estimate of cost, which is less than 0.01% of our total salaries, and then multiplying it by total salaries, which were more than $17.8 billion in 2018.

Cost of management
181500000

Comment

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?
Direct operations

Opportunity type
Products and services

Primary climate-related opportunity driver
Development and/or expansion of low emission goods and services

Type of financial impact
Increased revenue through demand for lower emissions products and services

Company-specific description
Regulatory incentives, such as the production tax credit for wind and the investment tax credit for solar, have enabled the growth of our renewable tax equity project finance business. State tax credits, performance-based incentives, and Renewable Energy Credits further support the market.

Time horizon
Current

Likelihood
Likely

Magnitude of impact
Medium-low

Are you able to provide a potential financial impact figure?
Yes, a single figure estimate

Potential financial impact figure (currency)
1600000000

Potential financial impact figure – minimum (currency)
<Not Applicable>

Potential financial impact figure – maximum (currency)
Explanation of financial impact figure
This opportunity increases the amount of financing we provided to clients. Potential financial impact is based on specific financing that directly supports solar and wind energy transactions in 2018. The estimate focuses on renewable energy opportunities that can be affected by change in regulation, and not broader sustainable finance initiatives. The figure excludes financing from products that are not specific to solar and wind energy opportunities.

Strategy to realize opportunity
As stated in our corporate goals, we are committed helping to accelerate a transition to a low-carbon economy. As such, we announced a $200 billion sustainable finance goal, which helps to raise awareness of our intent and attract customers in this space. We support the opportunity with dedicated staff of more than 30 clean tech and renewable energy finance experts who help customers directly, and indirectly through other lines of businesses as demand for low-carbon products increases. The cost to realize the opportunity is estimated to be $5 million annually.

Cost to realize opportunity
5000000

Comment

Identifier
Opp2

Where in the value chain does the opportunity occur?
Customer

Opportunity type
Markets

Primary climate-related opportunity driver
Other

Type of financial impact
Other, please specify (Improved competitive positioning)

Company-specific description
As a diversified, community-based financial services company that serves one in three households in the United States, there is opportunity for us to deepen relationships with customers by supporting them before, during, and after natural disaster events, especially those with greater intensity due to climate change (e.g. droughts, fires, floods, etc.).

Time horizon
Current

Likelihood
Likely

Magnitude of impact
Low

Are you able to provide a potential financial impact figure?
Yes, a single figure estimate

Potential financial impact figure (currency)
66000000

Potential financial impact figure – minimum (currency)
<Not Applicable>

Potential financial impact figure – maximum (currency)
<Not Applicable>

Explanation of financial impact figure
The potential financial impact is difficult to measure and the initial estimate disclosed here needs further assessment. However, it is based on calculating an estimated 0.25 percent of 2018 goodwill.

Strategy to realize opportunity
Through extensive business continuity planning, we attempt to account for the safety of our team members, reduce operational down time and help customers. For example, in the U.S., we maintain disaster-relief vehicles equipped with: ATMs, built-in generators, and communication capabilities. The vehicles enhance services to customers after disasters by being able to get just
about anywhere to serve them. As an example, after the Paradise fire in California, Wells Fargo’s Mobile Response Unit set up in nearby Chico, California to help customers endorse insurance checks, explain the property-loss process, and discuss options for longer-term assistance if needed. Wells Fargo also donated $3.5 million for housing and small business recovery in the area. Cost of management is integrated into existing budgets. It is estimated to be less than 0.01% of our total salaries, which were more than $17.8 billion in 2018 as reported in Annual Report, plus philanthropy aimed at climate adaption and disaster response, and expenses associated with costs to support disaster recovery vehicles, which represents a portion of the cost to maintain that service as those vehicles respond to a range of disasters not limited to ones caused or intensified by climate change.

**Cost to realize opportunity**

2000000000

**Comment**

<table>
<thead>
<tr>
<th>Identifier</th>
<th>Opp3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Where in the value chain does the opportunity occur?</td>
<td>Direct operations</td>
</tr>
<tr>
<td>Opportunity type</td>
<td>Products and services</td>
</tr>
<tr>
<td>Primary climate-related opportunity driver</td>
<td>Development and/or expansion of low emission goods and services</td>
</tr>
<tr>
<td>Type of financial impact</td>
<td>Other, please specify (Increased demand for products &amp; services)</td>
</tr>
<tr>
<td>Company-specific description</td>
<td>Wells Fargo has an opportunity to continue to help its customers adapt to and help mitigate climate change - e.g., via financing of renewable energy, green infrastructure, resilient buildings, and more. We are engaged in multiple efforts with third-parties aimed at evaluating ways in which we can further and more quickly deploy capital to these efforts. For example, internal teams are collaborating to help further ensure that our customers in renewable energy and clean tech industries have access to our full range of financial capabilities and expertise to help them succeed. Wells Fargo collaborates with the U.S. Alliance for Sustainable Finance and, through philanthropy and engagement, we are supporting CDP’s Matchmaker program, which helps cities overcome barriers to financing municipal green infrastructure projects. Our grant supports this work in cities nationwide, helping match cities with financiers, including impact investors.</td>
</tr>
<tr>
<td>Time horizon</td>
<td>Current</td>
</tr>
<tr>
<td>Likelihood</td>
<td>Likely</td>
</tr>
<tr>
<td>Magnitude of impact</td>
<td>Medium-low</td>
</tr>
<tr>
<td>Are you able to provide a potential financial impact figure?</td>
<td>Yes, a single figure estimate</td>
</tr>
</tbody>
</table>

**Potential financial impact figure (currency)**

23000000000

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

<Not Applicable>

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

<Not Applicable>

**Explanation of financial impact figure**

As an indicator of estimated financial implications, in 2018 we provided about $23 billion in sustainable finance. Commitments either directly or indirectly contributed to climate adaptation, efforts to support a low-carbon economy.

**Strategy to realize opportunity**

We aim to accelerate the transition to a lower-carbon economy by working together with our customers to finance and to invest in sustainable opportunities; and by exploring new opportunities to develop products and solutions that advance sustainability. For example, expansion of our environmental finance capabilities include renewable energy finance (i.e. PPAs), solar loan, lease product, support for corporate and municipal green bonds, support for sustainability-linked loans, financing for electric and hybrid vehicles and more. In 2019, Wells Fargo was named the bank sector tax equity investor of the year by Power Finance & Risk in the
publications 16th Annual Deals and Firms of the Year Awards. Cost to realize opportunity is about $200k for tracking and monitoring of the environmental finance goal, plus other costs that are integrated into existing budgets and estimated to be less than 0.01% of our total salaries, which were more than $17.8 billion in 2018 as reported in our Annual Report.

Cost to realize opportunity
178200000

Comment

C2.5

(C2.5) Describe where and how the identified risks and opportunities have impacted your business.

<table>
<thead>
<tr>
<th>Products and services</th>
<th>Impact</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Impacted</td>
<td>We expect the magnitude of the impact to be medium-low. Many of the products and services we offer today can support low-carbon business opportunities. In recognition of customer demand, we continue to innovate and enhance our products and services. We have expanded our products and services, and increased expertise and capacity to help our customers finance low-carbon solutions, as well as climate adaptation, and recovery efforts. This includes, for example, products to support solar projects, support for power purchase agreements, dedicated staff to support clean technology customers, and greater investments in disaster preparedness and recovery. It also includes enhancements to our Wells Fargo Asset Management business, which is increasingly viewing investments from environmental, social, and governance perspectives, including considerations associated with climate change.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Supply chain and/or value chain</th>
<th>Impact</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Impacted</td>
<td>We expect the magnitude of the impact to be low. We increased due diligence in our supply chain to better understand and address risks and opportunities associated with climate change within our supply chain. We were recognized as a CDP Supplier Engagement Leader. Over 5,000 companies submitted information to be independently assessed against CDP’s supplier engagement rating methodology. Of the companies that participated in CDP’s supply chain program in 2018, Wells Fargo was among the 3% that were awarded a place on the leader board.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Adaptation and mitigation activities</th>
<th>Impact</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Impacted</td>
<td>We expect the magnitude of the impact to be medium-low. We established a $12.4 million, 4-year philanthropic program to help communities implement adaptation efforts to address fire, floods, droughts, and sea-level rise, as well as build capacity for adaptation and mitigation activities. Additionally, we commissioned a study to further understand physical risks of climate change on our most critical facilities.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Investment in R&amp;D</th>
<th>Impact</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Impacted</td>
<td>We expect the magnitude of the impact to be medium-low. Wells Fargo’s commitment to, and strategy around, addressing climate related risks and opportunities has led to investments in tools and internal expertise. In partnership with key stakeholders, service providers, and subject matter experts, Wells Fargo has: • expanded efforts to develop ESG products within our asset management business; • developed (and continue to refine) the environmental and social risk rating grid to evaluate all mining, energy, and arms and armaments clients for relevant performance; • implemented a proprietary carbon risk assessment tool to evaluate utility clients for climate performance; • created innovative financial products geared specifically to renewable and clean tech clients; • expanded our Innovation Incubator (IN2) designed to help clean technology companies advance from the laboratory to the marketplace.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Operations</th>
<th>Impact</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Impacted</td>
<td>We expect the magnitude of the impact to be medium-low. Sustainability considerations are integrated into our operations as part of our business as usual routines, and are continually improved. We have invested in enhancing the efficiency of our operations to ensure that our company is well positioned to succeed in a low-carbon economy. Examples include: • We meet 100% of our global electricity needs with renewable energy • 28% of our facilities by square footage are Leadership in Energy and Environmental Design (LEED®) certified (40.9 million square feet of LEED certified projects) • We are implementing our Environmental and Social Risk Management policy in our lending and investment decisions • We support a corporate culture that encourages environmental sustainability and have achieved 119,750+ commitments.</td>
</tr>
</tbody>
</table>

Other, please specify

| Please select |

C2.6
(C2.6) Describe where and how the identified risks and opportunities have been factored into your financial planning process.

<table>
<thead>
<tr>
<th>Relevance</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Revenues</td>
<td>Impacted We expect the magnitude of the impact to be medium. We have issued a sustainable finance commitment to provide $200 billion in sustainable finance from 2018 to 2030. This is our third such goal, and Wells Fargo was the first financial institution in the U.S. to issue an environmental finance goal. That trend setting goal was established in 2006. Our ability to carry out this goal affects associated revenues. At the same time, we have also realized an 85% decrease in our coal mining commitments since 2012. Hence our short-term revenues are impacted in both directions.</td>
</tr>
<tr>
<td>Operating costs</td>
<td>Impacted We expect the magnitude of the impact to be low-medium. Impacted operating costs associated with risk and opportunities associated with climate change are expansive, and include costs associated with: • Teams that manage climate change risks (i.e. Chief Sustainability Officer, Environmental Social Risk Management team, etc.); • Teams that seize related business opportunities (i.e. Clean Tech Group, Renewable Energy team, etc.), including underwriters and risk managers; • Legal and compliance teams that review associated contracts and disclosures; • Marketing and communications teams that support sustainability initiatives; • Technology teams that support reporting and analytics; • Vendors that help us track greenhouse gas emissions and assess climate risks; • Rental space impacts, as we make better use of existing office space; and • Utility cost impacts, as we seek to maintain our efforts to meet 100% of electricity needs with renewable energy. These are just a few examples illustrating how operating costs are impacted.</td>
</tr>
<tr>
<td>Capital expenditures / capital allocation</td>
<td>Impacted We expect the magnitude of the impact to be low. The allocation of our capital expenditures has shifted. Avoided costs and efficiencies gained through operational sustainability investments have enabled us to delay or avoid capital expenditures, or further support investments in our operations. For example, investments in efficiencies in data centers have helped us avoid the need to build new ones. Additionally, shifts in the way we view, use, and manage office spaces has led to consolidation of spaces and the reduced need for new ones.</td>
</tr>
<tr>
<td>Acquisitions and divestments</td>
<td>Not evaluated</td>
</tr>
<tr>
<td>Access to capital</td>
<td>Not evaluated</td>
</tr>
<tr>
<td>Assets</td>
<td>Impacted We expect the magnitude of the impact to be medium-low. In 2018, we have provided $23 billion in sustainable finance toward our goal of proving $200 billion by 2030. Hence we are expecting to increase assets that are supportive of low-carbon economy.</td>
</tr>
<tr>
<td>Liabilities</td>
<td>Impacted for some suppliers, facilities, or product lines We expect the magnitude of the impact to be medium-low. As a financial institution, customer deposits are accounted for as liabilities on our balance sheet. Hence our liabilities could be affected if we lose depositary customers. Efforts to attract and maintain depositary customers that are concerned about climate change, are factored into financial planning decisions such as the establishment of our $200 billion sustainable finance goal, investments in teams that support that goal, efforts to reduce our operational carbon footprint, and efforts to help communities mitigate and adapt to climate change.</td>
</tr>
<tr>
<td>Other</td>
<td>Please select</td>
</tr>
</tbody>
</table>

C3. Business Strategy

C3.1

(C3.1a) Are climate-related issues integrated into your business strategy?
Yes

C3.1a

(C3.1a) Does your organization use climate-related scenario analysis to inform your business strategy?
Yes, qualitative and quantitative

C3.1c

(C3.1c) Explain how climate-related issues are integrated into your business objectives and strategy.

i. We conducted a sustainability materiality assessment to prioritize CSR risks and opportunities that are most relevant to our
business value and our stakeholders. This process included interviewing our leaders and stakeholders, reviewing research, and more. It included consideration of forward-looking scenario analyses, including a 1.5 and 2 degree scenarios, as well as the Paris Agreement which reflects global stakeholder interest and concerns about climate change. Results of the assessment influenced our business strategy to proactively support business practices that consider environmental/climate change risks and opportunities in all we do.

ii. We support the principles of the Paris Agreement regarding climate change, as outlined in our Statement on Climate Change and have made progress on adopting the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). We follow industry best practices in sustainability, and actively engage with the U.S. Green Building Council, e-Stewards®, and the Climate Group's RE100 to improve our own operational performance and collaborate with multiple stakeholders to advance innovation and sustainability in the built environment. To help guide environmentally responsible financing in our lines of business, we're signatories of the Equator Principles, the UN-supported Principles for Responsible Investing, and we are member underwriters of the Green Bond Principles.

iii. Our business strategy has been influenced to include the following statement within the corporate citizenship portion of our top six corporate goals, "We want to…accelerate the transition to a lower-carbon economy and healthier planet.” It also includes enhancing our infrastructure to help us integrate environmental stewardship in our operations, products and services, philanthropy, corporate culture, and governance. It drives goal setting including our establishment of a $200 billion sustainable finance commitment; our commitment to meet 100% of electricity needs with 100% renewable energy, a commitment which we have met; and our commitment to disclose the carbon intensity of our lending and investment portfolios.

iv. A substantial business decision made in 2018 that was influenced by climate change is our April 2018 announcement of our sustainable finance commitment. The three-pronged commitment includes, 1) a commitment to further invest in sustainable finance with a goal of providing $200 billion in finance by 2030, 2) a commitment to measure and monitor the carbon intensity of our credit portfolio and to make progress on the implementation of Task Force on Climate-related Financial Disclosure recommendations to further assess climate risks and opportunities, and 3) to engage in climate-related initiatives.

v. The aspects of climate change that have influenced our strategy include: climate adaptation and mitigation, opportunities and risk, and reputation.

vi. Our short-term strategy has been influenced by considerations of climate change. Based on the findings of our sustainability materiality assessment we set 2016-2020 goals, including goals that will help us advance a transition to a low-carbon economy and further assess climate risks and opportunities via implementation of TCFD recommendations. This includes a goal to disclose the carbon intensity of our lending and investment portfolios. To that end, we have commissioned a vendor to help us account for those emissions, and we are participating in CDP’s Science-Based Targets initiative road test. Both efforts are aimed at evaluating various methodologies for accounting for Scope 3, financed emissions.

The most important components of the medium-term strategy that have been influenced by climate change are:

- Mitigation. Efforts to lead by example and reduce our own greenhouse gas emissions have led to extensive efforts. We meet 100% of our global electricity needs with renewable energy, and have reduced our greenhouse gas emissions by 48% since 2008. Through products and services we also support low/no-carbon projects initiated by us or by our customers.
- Adaptation. We have enhanced our business continuity and disaster preparedness efforts to include, for example, emergency vehicles, as well as teams and plans to help team members and customers respond to extreme weather events. We have also implemented a Resilient Communities philanthropy program to help our communities adapt to our changing climate. Reputation. We seek to manage exposure to business activities that may result in reputational risk, including those linked to climate change, through implementation of our environmental and social risk management policy.
- Opportunities. As our clients seek to make the transition to a low-carbon economy, we can further support them through our products and services.
vii. Our long term strategy has also been influenced. In addition to including a desire to accelerate the transition to a low-carbon economy as one of our Corporate Citizenship goals, we have established business teams and policies to help us implement that goal into the future – e.g. our Environmental and Social Risk Management (risk), and our Clean Tech Finance (opportunities) teams. Our strategy recognizes that climate change cannot be addressed overnight; transition to a low-carbon economy is needed. During the transition period, we strive to manage risks and opportunities associated with financing a diversity of energy sources, while driving toward a low-carbon economy.

viii. Our efforts are gaining us a strategic advantage over our competitors as we have become a leading financier for greener buildings, renewable energy and clean technology. As such we are positioned and eager to continue to help our customers succeed in the emerging greener economy. When our customers and communities do well, we do well.

C3.1d

(C3.1d) Provide details of your organization’s use of climate-related scenario analysis.

<table>
<thead>
<tr>
<th>Climate related scenarios</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>IEA Sustainable development scenario</td>
<td>In 2018, Wells Fargo collaborated with peer firms and the management consultancy Oliver Wyman to pilot climate scenario analysis. The purpose of the project was to evaluate how climate risk scenarios could impact the credit quality of oil and gas companies and to understand sensitivities of borrowers’ creditworthiness in the context of a climate transition. The project was led by representatives from the credit risk and sustainability groups and resulted in the development of a methodology for conducting climate scenario analysis. The analysis focused on two specific transition scenarios – a sudden implementation of a carbon tax and a rapid expansion in the use of electric vehicles. The two scenarios are first translated into specific variables such as oil price and demand, which are then linked to the financial statements of oil and gas companies selected for the exercise. The scenario-adjusted financials are finally converted into a credit rating and a probability of default. The output of this process is a set of probabilities of default conditional on the transition scenarios for the sample of companies. The analysis showed a range of rating impacts across the different oil and gas segments – upstream, midstream, downstream, and integrated. Such projects help us build capabilities around climate scenario analysis, which will in turn help inform our strategy, financial planning decisions, and risk management processes, and can be included in our environmental, social risk management framework.</td>
</tr>
</tbody>
</table>

C4. Targets and performance

C4.1

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

Absolute target

C4.1a
(C4.1a) Provide details of your absolute emissions target(s) and progress made against those targets.

Target reference number
Abs 1

Scope
Scope 1+2 (location-based) +3 (upstream)

% emissions in Scope
100

Targeted % reduction from base year
45

Base year
2008

Start year
2008

Base year emissions covered by target (metric tons CO2e)
1953466

Target year
2020

Is this a science-based target?
No, but we anticipate setting one in the next 2 years

% of target achieved
100

Target status
Achieved

Please explain
The Scope 3 component of our goal only includes air travel from Scope 3: Business travel. We surpassed our 2020 goal in 2017 by reducing our emissions 48% compared to the base year.

C4.2
(C4.2) Provide details of other key climate-related targets not already reported in question C4.1/a/b.

**Target**
Renewable electricity consumption

**KPI – Metric numerator**
Renewable energy purchased

**KPI – Metric denominator (intensity targets only)**

<table>
<thead>
<tr>
<th>Base year</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Start year</strong></td>
<td>2017</td>
</tr>
<tr>
<td><strong>Target year</strong></td>
<td>2018</td>
</tr>
<tr>
<td><strong>KPI in baseline year</strong></td>
<td>4.6</td>
</tr>
<tr>
<td><strong>KPI in target year</strong></td>
<td>100</td>
</tr>
<tr>
<td><strong>% achieved in reporting year</strong></td>
<td>100</td>
</tr>
</tbody>
</table>

**Target Status**
Achieved

**Please explain**
We committed to purchasing renewable energy to power 100% of our operations by 2017 with a transition to long-term agreements that fund new sources of green power by 2020. In 2018, we met 100% of our global electricity needs with renewable energy. In our effort to transition to long-term agreements that fund new sources of green power by 2020, we supported a Bangalore off-site solar asset and the Minnesota Community Solar Garden program through long-term agreements representing 18,000 megawatt hours (MWh) annually of net new capacity to the grid in 2018. This brings us to 1% sources of green power through long-term agreements including 16 properties with on-site solar panels supporting a portion of their electricity needs.

**Part of emissions target**

**Is this target part of an overarching initiative?**
RE100

---

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

<table>
<thead>
<tr>
<th></th>
<th>Number of initiatives</th>
<th>Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Under investigation</td>
<td>19</td>
<td></td>
</tr>
<tr>
<td>To be implemented*</td>
<td>1910</td>
<td>46030</td>
</tr>
<tr>
<td>Implementation commenced*</td>
<td>5098</td>
<td>74957</td>
</tr>
<tr>
<td>Implemented*</td>
<td>1171</td>
<td>39700</td>
</tr>
<tr>
<td>Not to be implemented</td>
<td>270</td>
<td></td>
</tr>
</tbody>
</table>
Initiative type
Other, please specify (Space optimization. We consolidated just over two million square feet of building occupancy space from our corporate portfolio. This voluntary effort affects our Scope 1 and Scope 2 emissions, but primarily Scope 2 as indicated below.)

Description of initiative
<Not Applicable>

Estimated annual CO2e savings (metric tonnes CO2e)
32700

Scope
Scope 2 (location-based)

Voluntary/Mandatory
Voluntary

Annual monetary savings (unit currency – as specified in C0.4)
5740800

Investment required (unit currency – as specified in C0.4)
10978800

Payback period
1-3 years

Estimated lifetime of the initiative
Ongoing

Comment
Efforts of this particular project have been fully implemented. However, efforts to identify and implement additional space optimization opportunities are ongoing.

Initiative type
Energy efficiency: Building fabric

Description of initiative
Other, please specify (Includes all of our voluntary efforts to make our buildings more energy efficient via implementation of U.S. Green Building Council’s LEED® (Leadership in Energy and Environmental Design) programs including New Construction and Commercial Interiors.)

Estimated annual CO2e savings (metric tonnes CO2e)
900

Scope
Scope 2 (location-based)

Voluntary/Mandatory
Voluntary

Annual monetary savings (unit currency – as specified in C0.4)
167200

Investment required (unit currency – as specified in C0.4)
300000

Payback period
<1 year

Estimated lifetime of the initiative
6-10 years

Comment
This work affects our Scope 1 and Scope 2 emissions. Activities could include: LED lighting, light reflecting roofing materials,
energy efficient glazing, increased insulation, active day lighting, highly energy efficient HVAC systems, etc.

Initiative type
Energy efficiency: Building services

Description of initiative
Other, please specify (Includes all of our voluntary efforts to make our buildings more energy efficient via implementation of U.S. Green Building Council’s LEED Existing Buildings Operation and Maintenance, systematic energy audits, and energy conservation measures.)

Estimated annual CO2e savings (metric tonnes CO2e)
6100

Scope
Scope 2 (location-based)

Voluntary/Mandatory
Voluntary

Annual monetary savings (unit currency – as specified in C0.4)
587500

Investment required (unit currency – as specified in C0.4)
2937700

Payback period
4 - 10 years

Estimated lifetime of the initiative
6-10 years

Comment
This work affects our Scope 1 and Scope 2 emissions. Activities could include: LED lighting, one time and continuous commissioning, building operations training, defined set points, and energy performance measurement.

C4.3c

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

<table>
<thead>
<tr>
<th>Method</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employee engagement</td>
<td>Our companywide Corporate Citizenship goal includes a commitment to accelerate a transition to a low-carbon economy. Our Sustainability and Corporate Responsibility team engages Wells Fargo lines of business and decision makers to make investment decisions that support that goal.</td>
</tr>
<tr>
<td>Employee engagement</td>
<td>We require our Green Teams to develop business plans so that their local and/ or business line environmental initiatives contribute to and support our companywide Corporate Citizenship goal, which includes a commitment to accelerate the transition to a low-carbon economy.</td>
</tr>
<tr>
<td>Internal finance mechanisms</td>
<td>We identify emission reduction investments that meet our expected internal rate of return or other internal finance requirements – in other words we are able to make our greenhouse gas reduction investments “pencil out.” Investments in a software system that has automated the collection and reporting of energy and greenhouse gas information further supports our ability to continue to make financially responsible investment decisions.</td>
</tr>
</tbody>
</table>

C4.5

(C4.5) Do you classify any of your existing goods and/or services as low-carbon products or do they enable a third party to avoid GHG emissions?
Yes

C4.5a

(C4.5a) Provide details of your products and/or services that you classify as low-carbon products or that enable a third party
To avoid GHG emissions.

**Level of aggregation**
Company-wide

**Description of product/Group of products**
As a depository institution, we help customers avoid emissions via our operational practices. Customers can be assured that they are keeping their money in an institution that is reducing its Scope 1 and Scope 2 greenhouse gas emissions, while striving to measure and manage Scope 3 emissions. Our reduction in greenhouse gas emissions is reported annually via CDP, our Corporate Responsibility Report, and on our website.

**Are these low-carbon product(s) or do they enable avoided emissions?**
Avoided emissions

**Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions**
Other, please specify (Taxonomy is under development; sustainable finance methodology will be posted to wells Fargo.com in 2019.)

**% revenue from low carbon product(s) in the reporting year**

**Comment**
We utilize 100% renewable energy to meet our global electricity needs. We are enhancing the energy efficiency of our operations. Through our Wholesale Bank we lend to a diversity of industries, including high-carbon ones. Those continue to play a critical role in our global economy as the transition to a low-carbon economy takes place. We are working to accelerate that transition via our operational and lending practices. For example, financing clean tech and renewable energy companies while executing on our Environmental and Social Risk Management policy that helps us manage risks associated with lending to high-carbon customers. We also seek to assist our high-carbon customers make the transition. Tracking and measurement of Scope 3 emissions will help not only ensure we are managing and reducing our emissions to support global ambitions under the Paris Agreement to limit warming to well below 2°C and striving for no more than 1.5°C, but it will also help us more effectively communicate our efforts and the efforts of our customers that investing in low-carbon technologies and innovations.

---

**Level of aggregation**
Product

**Description of product/Group of products**
We offer solar financing for solar energy projects $500k and above.

**Are these low-carbon product(s) or do they enable avoided emissions?**
Low-carbon product and avoided emissions

**Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions**
Other, please specify (Solar energy projects)

**% revenue from low carbon product(s) in the reporting year**

**Comment**
The product offering is one of thousands of products and services offered by Wells Fargo.

---

**Level of aggregation**
Product

**Description of product/Group of products**
Green Bonds Green bonds can directly help our customers reduce their Scope 1 and Scope 2 emissions by financing of projects and capital improvements intended to conserve energy or other natural resources. An estimate of emissions avoided is not currently available. Wells Fargo Securities is a member of the Green Bond Principles, a set of voluntary guidelines for the issuance of green bonds. Wells Fargo Securities can help corporate and municipal customers issue green bonds, as well as similar bonds; e.g., sustainability bonds, climate bonds, SDG bonds, and more.

**Are these low-carbon product(s) or do they enable avoided emissions?**
Low-carbon product

**Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions**
Other, please specify (Green bonds per Green Bond Principles)

**% revenue from low carbon product(s) in the reporting year**

**Comment**
The product offering is one of thousands of products and services offered by Wells Fargo. Assumes all green bonds support low-carbon initiatives; however more research is needed to understand the net result of various projects considering the life-cycle...
Level of aggregation
Product

Description of product/Group of products
Wells Fargo's Renewable Energy and Environmental Finance (REEF) can directly help a third party reduce Scope 2 emissions. Through the REEF tax equity investment, Wells Fargo directly invests in the project vs. providing a line of credit that can be used for multiple purposes. This enables the full utilization of the U.S. Investment Tax Credit or Production Tax Credit for Renewable Energy reducing the upfront cost of capital needed to invest in solar systems. In general, the projects in which REEF invests generate Renewable Energy Credits (RECs) to be utilized for meeting renewable energy standards in their respective markets around the U.S. For example, by the close of 2018, Wells Fargo tax equity projects represented 9.5% of total wind and solar generation capacity in the U.S.

Are these low-carbon product(s) or do they enable avoided emissions?
Low-carbon product and avoided emissions

Taxonomy, project or methodology used to classify product(s) as low-carbon or to calculate avoided emissions
Other, please specify (No existing taxonomy)

% revenue from low carbon product(s) in the reporting year

Comment
The product offering is one of thousands of products and services offered by Wells Fargo.

C5. Emissions methodology

C5.1
(C5.1) Provide your base year and base year emissions (Scopes 1 and 2).

Scope 1

Base year start
January 1 2008

Base year end
December 31 2008

Base year emissions (metric tons CO2e)
145684

Comment

Scope 2 (location-based)

Base year start
January 1 2008

Base year end
December 31 2008

Base year emissions (metric tons CO2e)
1702450

Comment

Scope 2 (market-based)

Base year start
January 1 2008

Base year end
December 31 2008

Base year emissions (metric tons CO2e)
1702450

Comment

C5.2

(C5.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate Scope 1 and Scope 2 emissions.

Defra Voluntary 2017 Reporting Guidelines
The Climate Registry: General Reporting Protocol
US EPA Climate Leaders: Direct Emissions from Municipal Solid Waste Landfilling
US EPA Climate Leaders: Direct HFC and PFC Emissions from Manufacturing Refrigeration and Air Conditioning Equipment
US EPA Climate Leaders: Direct HFC and PFC Emissions from Use of Refrigeration and Air Conditioning Equipment
US EPA Climate Leaders: Indirect Emissions from Purchases/ Sales of Electricity and Steam
US EPA Climate Leaders: Direct Emissions from Stationary Combustion
US EPA Climate Leaders: Direct Emissions from Mobile Combustion Sources

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)**
95316

**Start date**
January 1 2018

**End date**
December 31 2018

**Comment**
In 2018, we changed how we estimate environmental metrics at some sites. All reporting years have been updated with this methodology.

---

(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**
Wells Fargo reports both a location based and market-based Scope 2 figure.

---

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

**Reporting year**

**Scope 2, location-based**
833204

**Scope 2, market-based (if applicable)**
5973

**Start date**
January 1 2018

**End date**
December 31 2018

**Comment**
In 2018, we changed how we estimate environmental metrics at some sites. All reporting years have been updated with this methodology.

---

(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?

No
(C6.5) Account for your organization's Scope 3 emissions, disclosing and explaining any exclusions.

**Purchased goods and services**

**Evaluation status**
Relevant, calculated

**Metric tonnes CO2e**
2347646

**Emissions calculation methodology**
These emissions are quantified using financial spend data. Companywide financial expenditures for services and non-capital goods are disaggregated according to service sector. Service sectors that are already included in the Scope 1 and Scope 2 inventories, such as energy purchases, are removed to avoid double-counting of emissions. To the remaining financial information, representing Scope 3 purchased goods and services, we apply inflation and exchange rate adjusted emission factors from Annex 13 of Defra's 2012 Guidelines to Defra/DECC's GHG Conversion Factors for Company Reporting. These emission factors represent cradle-to-gate emissions and use the 100 year GWPs from IPCC's Second Assessment Report.

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**
100

**Explanation**

**Capital goods**

**Evaluation status**
Relevant, calculated

**Metric tonnes CO2e**
559600

**Emissions calculation methodology**
These emissions are quantified using financial spend data. Companywide financial expenditures for capital goods are disaggregated according to service sector. To this financial information, representing Scope 3 capital goods, we apply inflation and exchange rate adjusted emission factors from Annex 13 of Defra's 2012 Guidelines to Defra/DECC's GHG Conversion Factors for Company Reporting. These emission factors represent cradle-to-gate emissions and use the 100 year GWPs from IPCC's Second Assessment Report.

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**
100

**Explanation**

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

**Evaluation status**
Relevant, calculated

**Metric tonnes CO2e**
156145

**Emissions calculation methodology**
We use energy purchase activity data from global operations as the basis for calculating emissions in this category. Upstream emissions from fuel purchases are quantified using activity data and emission factors calculated using lifecycle analysis software. Upstream emissions from purchased electricity within the U.S. are also quantified using activity data and emission factors calculated using lifecycle analysis software. Outside of the U.S., upstream emissions from purchased electricity are quantified using emission factors from Defra's 2014 Guidelines. Within the U.S., Transmission and Distribution (T&D) losses are calculated using % loss information and location-based emission factors from EPA's eGRID emission factors. Outside of the U.S., T&D losses are calculated using UK Defra's 2015 Guidelines. We use 100 year GWPs from IPCC's Fourth Assessment Report.

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**
82

**Explanation**
Upstream transportation and distribution

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>

Explanation
Not relevant: 1) There are limited remaining potential activities that could be undertaken or influenced by Wells Fargo to further reduce meaningful Scope 3 emissions from our upstream transportation and distribution. 2) The estimated size of upstream transportation and distribution is limited relative to our total estimated Scope 3 emissions from our downstream transportation and distribution.

Waste generated in operations

Evaluation status
Relevant, calculated

Metric tonnes CO2e
12132

Emissions calculation methodology
Wells Fargo’s Corporate Property Group compiles actual waste streams from locations serviced by waste haulers directly and estimates the waste stream in locations where the service is not directly managed using intensity factors developed using the actual data. This actual and modeled waste data is combined in order to cover the entire owned/leased portfolio. We then calculate waste emissions utilizing methodologies and emissions factors from Version 14 (updated March 2016) of EPA’s Waste Reduction Model (WARM) tool. The WARM tool calculates emissions based on a lifecycle approach. Avoided emissions from recycling, incineration and composting are quantified through the WARM tool’s baseline to alternative scenario comparison, but are not included in this Scope 3 emissions figure. We use 100 GWP from the IPCC’s Fourth Assessment Report.

Percentage of emissions calculated using data obtained from suppliers or value chain partners
100

Explanation

Business travel

Evaluation status
Relevant, calculated

Metric tonnes CO2e
93815

Emissions calculation methodology
Travel miles for each leg of travel that occurred in the reported year was obtained from the company travel agency. Mileage was then broken down into short, medium, and long haul segments. DEFRA Guidance was utilized for emission factors.

Percentage of emissions calculated using data obtained from suppliers or value chain partners
100

Explanation
Employee commuting

**Evaluation status**
Relevant, calculated

**Metric tonnes CO2e**
612464

**Emissions calculation methodology**
Data was provided by the Human Resources Department and was used to calculate commuting distance based on zip codes from primary residences to primary work locations. Additionally, a survey was sent to our New York location to collect other forms of commuting and then was multiplied by emission factors provided by DEFRA.

**Percentage of emissions calculated using data obtained from suppliers or value chain partners**
100

**Explanation**

*Upstream leased assets*

**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>

**Explanation**
Our definition of operational control for the Scope 1 and Scope 2 inventories includes leased assets. Thus, all of our upstream leased assets are included in the Scope 1 and Scope 2 inventories and are not relevant to the Scope 3 inventory.

*Downstream transportation and distribution*

**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>

**Explanation**
Not relevant: There are limited remaining potential activities that could be undertaken or influenced by Wells Fargo to further reduce meaningful Scope 3 emissions from our downstream transportation and distribution.

*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>

**Explanation**
Not relevant: None of Wells Fargo’s sold products require further processing, therefore we do not produce Scope 3 emissions in this category.
### Use 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>

**Explanation**

1) There are limited remaining potential activities that could be undertaken or influenced by Wells Fargo to further reduce meaningful Scope 3 emissions from our use of sold products (e.g. online banking services).
2) The estimated size of this category is limited relative to our total estimated Scope 3 emissions.

---

### End of life treatment 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>

**Explanation**

We quantified emissions from this source for 2012 and found them to be insignificant in size. This category also does not meet the other criteria for relevance.

---

### Downstream leased assets

**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>

**Explanation**

We include all assets that we own and lease to other entities within the boundaries of our Scope 1 and Scope 2 inventories. Since downstream leased assets are already included in the Scope 1 and Scope 2 inventories, this category is not relevant to the Scope 3 inventory.

---

### 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>

**Explanation**

Wells Fargo do not franchise any of our operations.
Investments

**Evaluation status**
Relevant, not yet calculated

**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>

**Explanation**
Wells Fargo is committed to tracking and measuring carbon associated with its lending and investments, per its recently announced Sustainable Finance Commitment.

Other (upstream)

**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>

**Explanation**
Not applicable

Other (downstream)

**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>

**Explanation**
Not applicable

---

C6.7

(C6.7) Are carbon dioxide emissions from biologically sequestered carbon relevant to your organization?
No

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.

Intensity figure  
0.0000107

Metric numerator (Gross global combined Scope 1 and 2 emissions)  
928520

Metric denominator  
unit total revenue

Metric denominator: Unit total  
86400000000

Scope 2 figure used  
Location-based

% change from previous year  
5.52

Direction of change  
Decreased

Reason for change  
The decrease was due primarily to emissions reduction activities such as energy efficiency efforts including the implementation of LEED standards, use of centralized energy management systems, installation of highly energy efficient equipment and lighting systems; among others. Through a 7% reduction in total Scope 1 and Scope 2 emissions and a 2% decrease in revenue, we achieved the reported 5.52% revenue-normalized decrease in emissions from 2017 to 2018.

C7. Emissions breakdowns

C7.1

(C7.1) Does your organization break down its Scope 1 emissions by greenhouse gas type?  
Yes

C7.1a

(C7.1a) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used greenhouse warming potential (GWP).

<table>
<thead>
<tr>
<th>Greenhouse gas</th>
<th>Scope 1 emissions (metric tons of CO2e)</th>
<th>GWP Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO2</td>
<td>77599</td>
<td>IPCC Fourth Assessment Report (AR4 - 100 year)</td>
</tr>
<tr>
<td>CH4</td>
<td>276</td>
<td>IPCC Fourth Assessment Report (AR4 - 100 year)</td>
</tr>
<tr>
<td>N2O</td>
<td>5750</td>
<td>IPCC Fourth Assessment Report (AR4 - 100 year)</td>
</tr>
<tr>
<td>HFCs</td>
<td>11691</td>
<td>IPCC Fourth Assessment Report (AR4 - 100 year)</td>
</tr>
</tbody>
</table>

C7.2
(C7.2) Break down your total gross global Scope 1 emissions by country/region.

<table>
<thead>
<tr>
<th>Country/Region</th>
<th>Scope 1 emissions (metric tons CO2e)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Africa</td>
<td>2</td>
</tr>
<tr>
<td>Asia Pacific (or JAPA)</td>
<td>2655</td>
</tr>
<tr>
<td>Europe</td>
<td>4572</td>
</tr>
<tr>
<td>Middle East</td>
<td>8</td>
</tr>
<tr>
<td>North America</td>
<td>88072</td>
</tr>
<tr>
<td>South America</td>
<td>7</td>
</tr>
</tbody>
</table>

(C7.3) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.
By activity

(C7.3c) Break down your total gross global Scope 1 emissions by business activity.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Scope 1 emissions (metric tons CO2e)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stationary combustion</td>
<td>80416</td>
</tr>
<tr>
<td>Mobile combustion</td>
<td>3209</td>
</tr>
<tr>
<td>Refrigerants and fire suppressants</td>
<td>11691</td>
</tr>
</tbody>
</table>

(C7.5) Break down your total gross global Scope 2 emissions by country/region.

<table>
<thead>
<tr>
<th>Country/Region</th>
<th>Scope 2, location-based (metric tons CO2e)</th>
<th>Scope 2, market-based (metric tons CO2e)</th>
<th>Purchased and consumed electricity, heat, steam or cooling (MWh)</th>
<th>Purchased and consumed low-carbon electricity, heat, steam or cooling accounted in market-based approach (MWh)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Africa</td>
<td>35</td>
<td>35</td>
<td>35</td>
<td>0</td>
</tr>
<tr>
<td>Asia Pacific (or JAPA)</td>
<td>36906</td>
<td>1922</td>
<td>51653</td>
<td>48271</td>
</tr>
<tr>
<td>Europe</td>
<td>1547</td>
<td>714</td>
<td>5133</td>
<td>5133</td>
</tr>
<tr>
<td>Middle East</td>
<td>91</td>
<td>91</td>
<td>156</td>
<td>0</td>
</tr>
<tr>
<td>North America</td>
<td>794590</td>
<td>3176</td>
<td>1839220</td>
<td>1825683</td>
</tr>
<tr>
<td>South America</td>
<td>35</td>
<td>35</td>
<td>140</td>
<td>0</td>
</tr>
</tbody>
</table>

(C7.6) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.
By activity

(C7.6c)
(C7.6c) Break down your total gross global Scope 2 emissions by business activity.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Scope 2, location-based emissions (metric tons CO2e)</th>
<th>Scope 2, market-based emissions (metric tons CO2e)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purchased electricity</td>
<td>830090</td>
<td>2859</td>
</tr>
<tr>
<td>Purchased chilled water</td>
<td>137</td>
<td>137</td>
</tr>
<tr>
<td>Purchased steam</td>
<td>2977</td>
<td>2977</td>
</tr>
</tbody>
</table>

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?

Decreased

C7.9a

(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.

<table>
<thead>
<tr>
<th>Reason</th>
<th>Change in emissions (metric tons CO2e)</th>
<th>Direction of change</th>
<th>Emissions value (percentage)</th>
<th>Please explain calculation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Change in renewable energy consumption</td>
<td>0</td>
<td>No change</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other emissions reduction activities</td>
<td>74742</td>
<td>Decreased</td>
<td>7.45</td>
<td>The reductions experienced across the Wells Fargo portfolio involve a combination of efforts in efficiency and low carbon technologies, including targeted and proactive energy efficiency efforts in our buildings - i.e., implementation of U.S. Green Building Council's LEED standards; use of centralized energy management systems, installation of highly energy efficient equipment and lighting systems, use of narrow set points and energy efficiency purchasing policies; the continuation of technology energy efficiency programs - i.e. server virtualization, server decommission, data center facilities efficiency optimization, technology upgrades, data center consolidations and active power management of desktop computers; low carbon installations; on-site solar; and behavioral change programs – i.e. lights out campaigns, use of natural light and turning off computers when not in use. These emissions reduction activities resulted in a 74,742 MTCO2e decrease in Scope 1 and Scope 2 which was equal to a 7.45% decrease when compared to the 2017 Scope 1 and Scope 2 emissions 1,003,262 MTCO2e. ( \frac{(1003262-928520)}{1003262} \times 100 = -7.45% ).</td>
</tr>
<tr>
<td>Divestment</td>
<td>0</td>
<td>No change</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Acquisitions</td>
<td>0</td>
<td>No change</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mergers</td>
<td>0</td>
<td>No change</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Change in output</td>
<td>0</td>
<td>No change</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Change in methodology</td>
<td>0</td>
<td>No change</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Change in boundary</td>
<td>0</td>
<td>No change</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Change in physical operating conditions</td>
<td>0</td>
<td>No change</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Unidentified</td>
<td>0</td>
<td>No change</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td>0</td>
<td>No change</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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?

Location-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.

<table>
<thead>
<tr>
<th>Activity</th>
<th>Indicate whether your organization undertakes this energy-related activity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consumption of fuel (excluding feedstocks)</td>
<td>Yes</td>
</tr>
<tr>
<td>Consumption of purchased or acquired electricity</td>
<td>Yes</td>
</tr>
<tr>
<td>Consumption of purchased or acquired heat</td>
<td>No</td>
</tr>
<tr>
<td>Consumption of purchased or acquired steam</td>
<td>Yes</td>
</tr>
<tr>
<td>Consumption of purchased or acquired cooling</td>
<td>Yes</td>
</tr>
<tr>
<td>Generation of electricity, heat, steam, or cooling</td>
<td>Yes</td>
</tr>
</tbody>
</table>

C8.2a

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

<table>
<thead>
<tr>
<th>Activity</th>
<th>Heating value</th>
<th>MWh from renewable sources</th>
<th>MWh from non-renewable sources</th>
<th>Total MWh</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consumption of fuel (excluding feedstock)</td>
<td>HHV (higher heating value)</td>
<td>0</td>
<td>418114</td>
<td>418114</td>
</tr>
<tr>
<td>Consumption of purchased or acquired electricity</td>
<td>&lt;Not Applicable&gt;</td>
<td>1879087</td>
<td>3851</td>
<td>1882938</td>
</tr>
<tr>
<td>Consumption of purchased or acquired heat</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>Consumption of purchased or acquired steam</td>
<td>&lt;Not Applicable&gt;</td>
<td>0</td>
<td>13144</td>
<td>13144</td>
</tr>
<tr>
<td>Consumption of purchased or acquired cooling</td>
<td>&lt;Not Applicable&gt;</td>
<td>0</td>
<td>255</td>
<td>255</td>
</tr>
<tr>
<td>Consumption of self-generated non-fuel renewable energy</td>
<td>&lt;Not Applicable&gt;</td>
<td>678</td>
<td>&lt;Not Applicable&gt;</td>
<td>678</td>
</tr>
<tr>
<td>Total energy consumption</td>
<td>&lt;Not Applicable&gt;</td>
<td>1879765</td>
<td>435364</td>
<td>2315129</td>
</tr>
</tbody>
</table>

C8.2b
(C8.2b) Select the applications of your organization's consumption of fuel.

<table>
<thead>
<tr>
<th>Consumption of fuel</th>
<th>Indicate whether your organization undertakes this fuel application</th>
</tr>
</thead>
<tbody>
<tr>
<td>for the generation of electricity</td>
<td>No</td>
</tr>
<tr>
<td>for the generation of heat</td>
<td>No</td>
</tr>
<tr>
<td>for the generation of steam</td>
<td>No</td>
</tr>
<tr>
<td>for the generation of cooling</td>
<td>No</td>
</tr>
<tr>
<td>for co-generation or tri-generation</td>
<td>No</td>
</tr>
</tbody>
</table>

(C8.2c) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

**Fuels (excluding feedstocks)**

- Diesel

**Heating value**

- HHV (higher heating value)

**Total fuel MWh consumed by the organization**

- 4713 MWh

**MWh fuel consumed for self-generation of electricity**

- <Not Applicable>

**MWh fuel consumed for self-generation of heat**

- <Not Applicable>

**MWh fuel consumed for self-generation of steam**

- <Not Applicable>

**MWh fuel consumed for self-generation of cooling**

- <Not Applicable>

**MWh fuel consumed for self-cogeneration or self-trigeneration**

- <Not Applicable>

**Comment**

**Fuels (excluding feedstocks)**

- Motor Gasoline

**Heating value**

- HHV (higher heating value)

**Total fuel MWh consumed by the organization**

- 0 MWh

**MWh fuel consumed for self-generation of electricity**

- <Not Applicable>

**MWh fuel consumed for self-generation of heat**

- <Not Applicable>

**MWh fuel consumed for self-generation of steam**

- <Not Applicable>

**MWh fuel consumed for self-generation of cooling**

- <Not Applicable>

**MWh fuel consumed for self-cogeneration or self-trigeneration**

- <Not Applicable>

**Comment**
### Fuels (excluding feedstocks)

**Jet Kerosene**

<table>
<thead>
<tr>
<th>Heating value</th>
<th>HHV (higher heating value)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total fuel MWh consumed by the organization</strong></td>
<td>13024</td>
</tr>
<tr>
<td>MWh fuel consumed for self-generation of electricity</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>MWh fuel consumed for self-generation of heat</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>MWh fuel consumed for self-generation of steam</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>MWh fuel consumed for self-generation of cooling</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>MWh fuel consumed for self-cogeneration or self-trigeneration</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
</tbody>
</table>

**Comment**

---

**Fuels (excluding feedstocks)**

**Fuel Oil Number 2**

<table>
<thead>
<tr>
<th>Heating value</th>
<th>HHV (higher heating value)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total fuel MWh consumed by the organization</strong></td>
<td>5620</td>
</tr>
<tr>
<td>MWh fuel consumed for self-generation of electricity</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>MWh fuel consumed for self-generation of heat</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>MWh fuel consumed for self-generation of steam</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>MWh fuel consumed for self-generation of cooling</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>MWh fuel consumed for self-cogeneration or self-trigeneration</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
</tbody>
</table>

**Comment**

---

**Fuels (excluding feedstocks)**

**Natural Gas**

<table>
<thead>
<tr>
<th>Heating value</th>
<th>HHV (higher heating value)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total fuel MWh consumed by the organization</strong></td>
<td>394095</td>
</tr>
<tr>
<td>MWh fuel consumed for self-generation of electricity</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>MWh fuel consumed for self-generation of heat</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
<tr>
<td>MWh fuel consumed for self-generation of steam</td>
<td>&lt;Not Applicable&gt;</td>
</tr>
</tbody>
</table>
MWh fuel consumed for self-generation of cooling
<Not Applicable>

MWh fuel consumed for self-cogeneration or self-trigeneration
<Not Applicable>

Comment

Fuels (excluding feedstocks)
Propane Gas

Heating value
HHV (higher heating value)

Total fuel MWh consumed by the organization
663

MWh fuel consumed for self-generation of electricity
<Not Applicable>

MWh fuel consumed for self-generation of heat
<Not Applicable>

MWh fuel consumed for self-generation of steam
<Not Applicable>

MWh fuel consumed for self-generation of cooling
<Not Applicable>

MWh fuel consumed for self-cogeneration or self-trigeneration
<Not Applicable>

Comment

C8.2d

(C8.2d) List the average emission factors of the fuels reported in C8.2c.

Diesel

Emission factor
74.3888

Unit
kg CO2e per million Btu

Emission factor source
The Climate Registry 2018 Gen. Reporting Protocol - USA Commercial

Comment

Fuel Oil Number 2

Emission factor
74.3888

Unit
kg CO2e per million Btu

Emission factor source
The Climate Registry 2018 Gen. Reporting Protocol - USA Commercial

Comment
Jet Kerosene

**Emission factor**
9.75

**Unit**
kg CO2e per gallon

**Emission factor source**
The Climate Registry 2018 Gen. Reporting Protocol - USA Commercial

**Comment**

Motor Gasoline

**Emission factor**
9.13

**Unit**
kg CO2e per gallon

**Emission factor source**
The Climate Registry 2018 Gen. Reporting Protocol - USA Commercial

**Comment**

Natural Gas

**Emission factor**
53.2073

**Unit**
kg CO2e per million Btu

**Emission factor source**
The Climate Registry 2018 Gen. Reporting Protocol - USA Commercial

**Comment**

Propane Gas

**Emission factor**
61.8888

**Unit**
kg CO2e per million Btu

**Emission factor source**
The Climate Registry 2018 Gen. Reporting Protocol - USA Commercial

**Comment**

C8.2e

(C8.2e) Provide details on the electricity, heat, steam, and cooling your organization has generated and consumed in the reporting year.

<table>
<thead>
<tr>
<th></th>
<th>Total Gross generation (MWh)</th>
<th>Generation that is consumed by the organization (MWh)</th>
<th>Gross generation from renewable sources (MWh)</th>
<th>Generation from renewable sources that is consumed by the organization (MWh)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electricity</td>
<td>1033</td>
<td>1033</td>
<td>1033</td>
<td>678</td>
</tr>
<tr>
<td>Heat</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Steam</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Cooling</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
(C8.2f) Provide details on the electricity, heat, steam and/or cooling amounts that were accounted for at a low-carbon emission factor in the market-based Scope 2 figure reported in C6.3.

**Basis for applying a low-carbon emission factor**
Energy attribute certificates, Renewable Energy Certificates (RECs)

**Low-carbon technology type**
Wind

**Region of consumption of low-carbon electricity, heat, steam or cooling**
North America

**MWh consumed associated with low-carbon electricity, heat, steam or cooling**
1825683

**Emission factor (in units of metric tons CO2e per MWh)**
0

**Comment**

---

**Basis for applying a low-carbon emission factor**
Energy attribute certificates, I-RECs

**Low-carbon technology type**
Wind

**Region of consumption of low-carbon electricity, heat, steam or cooling**
Asia Pacific

**MWh consumed associated with low-carbon electricity, heat, steam or cooling**
48271

**Emission factor (in units of metric tons CO2e per MWh)**
0

**Comment**

---

**Basis for applying a low-carbon emission factor**
Energy attribute certificates, Guarantees of Origin

**Low-carbon technology type**
Wind

**Region of consumption of low-carbon electricity, heat, steam or cooling**
Europe

**MWh consumed associated with low-carbon electricity, heat, steam or cooling**
5133

**Emission factor (in units of metric tons CO2e per MWh)**
0

**Comment**

---

**Basis for applying a low-carbon emission factor**
Off-grid energy consumption from an on-site installation or through a direct line to an off-site generator owned by another company

**Low-carbon technology type**
Solar PV

**Region of consumption of low-carbon electricity, heat, steam or cooling**
North America

**MWh consumed associated with low-carbon electricity, heat, steam or cooling**
678
C9. Additional metrics

C9.1

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

<table>
<thead>
<tr>
<th>Description</th>
<th>Metric value</th>
<th>Metric numerator</th>
<th>Metric denominator</th>
</tr>
</thead>
<tbody>
<tr>
<td>Energy usage</td>
<td>2315485</td>
<td>Total energy usage (MWh)</td>
<td>Percentage change from previous year</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>1</td>
</tr>
</tbody>
</table>

Direction of change
Decreased

Please explain
Our absolute energy consumption in our portfolio has reduced from 2,335,496 MWh in 2017 to 2,315,485 MWh in 2018.

C10. Verification

C10.1

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

<table>
<thead>
<tr>
<th>Scope</th>
<th>Verification/assurance status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scope 1</td>
<td>Third-party verification or assurance process in place</td>
</tr>
<tr>
<td>Scope 2 (location-based or market-based)</td>
<td>Third-party verification or assurance process in place</td>
</tr>
<tr>
<td>Scope 3</td>
<td>Third-party verification or assurance process in place</td>
</tr>
</tbody>
</table>
(C10.1a) Provide further details of the verification/assurance undertaken for your Scope 1 and/or Scope 2 emissions and attach the relevant statements.

**Scope**
Scope 1

**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**
Wells Fargo 2018 GHG emissions verif statement.pdf

**Page/section reference**
Entire document

**Relevant standard**
ISO14064-3

**Proportion of reported emissions verified (%)**
100

---

**Scope**
Scope 2 location-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**
Wells Fargo 2018 GHG emissions verif statement.pdf

**Page/section reference**
Entire document

**Relevant standard**
ISO14064-3

**Proportion of reported emissions verified (%)**
100

---

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

Scope
Scope 3- all relevant categories

Verification or assurance cycle in place
Annual process

Status in the current reporting year
Complete

Attach the statement
Wells Fargo 2018 GHG emissions verif statement.pdf

Page/section reference
Entire document

Relevant standard
ISO14064-3

(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?
Yes

(C10.2a) Which data points within your CDP disclosure have been verified, and which verification standards were used?

<table>
<thead>
<tr>
<th>Disclosure module verification relates to</th>
<th>Data verified</th>
<th>Verification standard</th>
<th>Please explain</th>
</tr>
</thead>
<tbody>
<tr>
<td>C8. Energy</td>
<td>Renewable energy</td>
<td>ISO14064-3</td>
<td>Our renewable energy consumption in verified as part of our greenhouse gas emissions verification.</td>
</tr>
</tbody>
</table>

(C11.1) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?
No, and we do not anticipate being regulated in the next three years

(C11.2) Has your organization originated or purchased any project-based carbon credits within the reporting period?
No
(C11.3) Does your organization use an internal price on carbon?
Yes

C11.3a

(C11.3a) Provide details of how your organization uses an internal price on carbon.

Objective for implementing an internal carbon price
Other, please specify (Risk management)

GHG Scope
Scope 3

Application
Corporate structure, price is applied to (i.e., business units, corporate divisions, facilities). An annual carbon assessment is completed on our electric utility portfolio.

Actual price(s) used (Currency /metric ton)
36

Variance of price(s) used
$36/metric ton CO2 Our tool allows for use of any variable; therefore, if we were evaluating a transaction in Canada, for example, we could use actual carbon tax figures.

Type of internal carbon price
Shadow price

Impact & implication
The price is used to evaluate the risk our customers are taking with their carbon emitting generation. We use $36 per metric ton of CO2 in our assessment of potential credit commitments to relevant power industry companies. The price is included in assessment of operating costs. The price is based on the US Environmental Protection Agency’s “societal cost of carbon” December 2016. That EPA document can be found here: https://www.epa.gov/sites/production/files/2016-12/documents/social_cost_of_carbon_fact_sheet.pdf.

C12. Engagement

C12.1

(C12.1) Do you engage with your value chain on climate-related issues?
Yes, our suppliers
Yes, our customers
Yes, other partners in the value chain
(C12.1a) Provide details of your climate-related supplier engagement strategy.

**Type of engagement**  
Information collection (understanding supplier behavior)

**Details of engagement**  
Collect climate change and carbon information at least annually from suppliers

**% of suppliers by number**  
32

**% total procurement spend (direct and indirect)**  
60

**% Scope 3 emissions as reported in C6.5**  

**Rationale for the coverage of your engagement**  
We invite a selection of supplier to respond to the CDP supply chain questionnaire. CDP supply chain participants were invited based upon a variety of factors designed to capture the most effective data, including their environmental impact based on their industry, our spend with the supplier, and the nature of the services the supplier provides. Suppliers of many sizes and industries are participating to develop short and long-term development opportunities across our wide and diverse footprint. We believe that this level of engagement is appropriate because it includes our largest suppliers by spend, resulting in inviting 60% of our suppliers by total procurement spend.

**Impact of engagement, including measures of success**  
We invite over 200 suppliers to respond to the CDP supply chain questionnaire. One measure of our success is our supplier response rate. In 2018, 52% of our invited suppliers responded to the questionnaire. We are anticipating that more of our suppliers invited to participate in CDP disclosure will participate this year. One indication of the impact of this engagement is the greater engagement and efficiencies between Wells Fargo and our suppliers. For example, this engagement has led to an increase in the level and breadth of our communication with suppliers. Comment.
(C12.1b) Give details of your climate-related engagement strategy with your customers.

**Type of engagement**
Collaboration & innovation

**Details of engagement**
Run a campaign to encourage innovation to reduce climate change impacts

**% of customers by number**

**% Scope 3 emissions as reported in C6.5**

Please explain the rationale for selecting this group of customers and scope of engagement

Our Environmental and Social Risk Management (ESRM) team reviewed 320 oil and gas customers in 2018, and engaged in direct conversations with many of these customers on climate change commitments and related expectations. ESRM worked with industry associations such as Association of Oil Pipelines (AOPL) to directly educate the entire member base on Wells Fargo ESRM expectations. Focusing engagement on the higher risk names within this subgroup of the Wells Fargo portfolio allows Wells Fargo to most efficiently: (i) engage clients that pose the most significant environmental and social risks to communities, (ii) address areas of financing that most directly contribute to reputational risk to Wells Fargo, (iii) strengthen critical areas of our portfolio to improve Wells Fargo resilience to environmental and social risks over medium and longer term time horizons, and (iv) work with clients to improve their performance and increase access to capital/minimize operational issues due to environmental and social topics. We are in the process of refining an approach to reporting on financed emissions and carbon intensity and intend to report on this topic more concretely moving forward.

**Impact of engagement, including measures of success**
Impact: • Contributing to improved environmental and social strategies and performance across companies engaged; • Closer relationships between Wells Fargo and clients; • Improved working relationships between ESRM and bankers; • Wells Fargo positioned as the bank with the most robust client engagement and E&S risk management platforms. • Providing the best in customer service tied to environmental and social guidance. Measures of success: • Number of client trainings/conversations/meetings; • Improvements in client environmental and social performance, disclosure, and risk rating over time; • Overall reduction in the percentage of portfolio companies environmental social risk rating of high and critical, and • Improvements to carbon risk exposure over time. 

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C12.1c
Give details of your climate-related engagement strategy with other partners in the value chain.

Value chain partners included in this response are: team members, management, and nonprofit partners.

Our engagement strategy is designed to ensure that we gain a diversity of feedback from our stakeholders. We regularly conduct a corporate responsibility materiality analysis that helps us prioritize our efforts. The analysis engages senior management at Wells Fargo, and external stakeholders with expertise in environmental, social, and governance issues. The analysis draws upon a broad reach of proprietary and public research, data from Sustainability Accounting Standards Board (SASB), United Nations Sustainable Development Goals (UN SDGs), Task Force on Climate-related Financial Disclosures (TCFD) and more. Engagement with stakeholders is conducted in person, and via email, phone and net meetings. Engagement helps us prioritize initiatives. Once initiatives are prioritized, we work across the company to set measurable goals. For example, we heard from stakeholders that it was not enough to report on our existing sustainable finance activities, but that a future indicator was needed. Hence, we established a goal to provide $200 billion in sustainable financing between 2018 and 2030. We announced that goal in 2018. Engagement with stakeholders has also led us to commit to implementing the TCFD recommendations.

An example of ongoing engagement with team members is the development of an online tool that enables us to educate team members on actions they can take to support sustainability initiatives, as well as quantify the impact of those commitments – e.g., associated avoidance in greenhouse gas emissions. We have also formed an internal Sustainability Advisory Council to provide feedback and input on ongoing environmental efforts and priorities. Examples of engagement with nonprofit organizations include:

- **Innovation Incubator (IN2):** IN2 is a dedicated philanthropy program that seeks to speed up the commercialization of clean technology. The program works in collaboration with the National Renewable Energy Laboratory, universities, and incubators while leveraging our own facilities where clean technologies are beta tested. The program has directly supported 30 businesses that have gone on to receive $142 million in external follow-on funding such as venture capital and hundreds more start-ups through our 55+ channel partners across the country.

- **Bank 2030:** We are working with the University of Cambridge Institute for Sustainability Leadership (CISL) to uncover more ways that we can reduce greenhouse gas emissions. The project, called Bank 2030, is a part of the Banking Environment Initiative (BEI), which is convened by CISL’s Centre for Sustainable Finance. The BEI was created in 2010 by the chief executives of some of the world’s largest banks. Its mission is to lead the banking industry in collectively directing capital towards environmentally and socially sustainable economic development. The Bank 2030 project asks how banks can help peak and lock-in declining greenhouse gas emissions. To do this, the project will analyze the best practices for financing a low-carbon economy. It will showcase innovative thinking and strategic leadership, as well as highlighting opportunities not yet grasped and, as important, the barriers there are to allocating more capital to economic activities that would reduce greenhouse gas emissions.

- **CDP Matchmaker:** Through philanthropy we are supporting CDP’s Matchmaker program that seeks to facilitate financing of green infrastructure projects by matching municipal projects to environmental, social, and governance investors and other financiers.

- **Leadership in Community Resilience Program:** Through our Resilient Communities program administered by the National Fish and Wildlife Program, which is aimed at helping communities get ahead of impacts associated with our changing climate through capacity building and strategic conservation projects focused on fire, floods, droughts and sea-level rise, we support the National League of Cities’ (NLC) Leadership in Community Resilience Program. The program leverages NLC’s expertise and network, to help its member cities build capacity for climate adaptation and preparedness. We were a founding member of this program in 2017 and to date the program has worked with nearly 30 cities in 20 states including Alabama, Arizona, California, Colorado, Florida, Illinois, Indiana, Iowa, Kansas, Maine, Maryland, Michigan, Minnesota, Montana, New Hampshire, New Jersey, North Carolina, Rhode Island, and Texas.

**C12.3**

Do you engage in activities that could either directly or indirectly influence public policy on climate-related issues through any of the following?

- Direct engagement with policy makers
- Funding research organizations
- Other
C12.3a

(C12.3a) On what issues have you been engaging directly with policy makers?

<table>
<thead>
<tr>
<th>Focus of legislation</th>
<th>Corporate position</th>
<th>Details of engagement</th>
<th>Proposed legislative solution</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other, please specify</td>
<td>Support</td>
<td>Wells Fargo joined other financial institutions in a joint statement calling for leadership and cooperation among governments for commitments leading to a strong global climate agreement.</td>
<td>Statement was issued pre CDP 21 to encourage a strong global climate agreement to provide greater market certainty, accelerate investment, drive innovation in low carbon energy, and create jobs.</td>
</tr>
</tbody>
</table>

(Collaboration for climate solutions)

C12.3d

(C12.3d) Do you publicly disclose a list of all research organizations that you fund?

Yes

C12.3e
(C12.3e) Provide details of the other engagement activities that you undertake.

We are a founding member of the Business Council on Climate Change’s Corporate Climate Change Leadership Circle. We work with other corporations and the City of San Francisco to identify opportunities to work together to meet mutual climate change related goals.

**Method of engagement:** Group

**Topic of engagement:** Climate change

**Nature of the engagement:** Collaboration

**Actions that you are advocating as part of that engagement**
- Collaboration among Wells Fargo Green Team members of San Francisco-based businesses to accelerate initiatives though sharing of best practices and ideas,
- Energy efficiency education for San Francisco businesses and residents,
- Collaboration among San Francisco businesses and the City of San Francisco to work together to meet mutual climate change related goals.

Other engagement activities and associations include:
- **IN²:** In 2018, we expanded the Wells Fargo Innovation Incubator (IN²) program to advance technologies that address the interconnection of food, water, and energy. To support this new focus area, we added the Donald Danforth Plant Science Center, the world’s largest independent plant science institute, as a strategic partner to help develop and validate promising agricultural technologies that address critical sustainability challenges. Working with the Danforth Center, we are launching our first cohort of startups working at this important intersection in 2019. Through our IN² Channel Partner Awards Program in 2018, we announced more than $1 million in cleantech grants to 19 organizations to support eight projects aimed at addressing gaps in clean-energy technology development and commercialization. In late 2018, we welcomed the fourth round of clean tech and energy efficiency startup companies into the program. The five startups joined 20 other early-stage companies that have received support to address energy challenges in commercial buildings, which currently account for more than 40% of U.S. energy usage. Companies selected to participate in the IN² program receive up to $250,000 in non-dilutive funding from Wells Fargo, as well as technical support and validation from experts at the National Renewable Energy Laboratory (NREL) and the Danforth Center, and the opportunity to beta test at a Wells Fargo facility or with a strategic program partner.
- **Bank 2030:** We are working with the University of Cambridge Institute for Sustainability Leadership (CISL) to uncover more ways that we can reduce greenhouse gas emissions. The project, called Bank 2030, is a part of the Banking Environment Initiative (BEI), which is convened by CISL’s Centre for Sustainable Finance. The BEI was created in 2010 by the chief executives of some of the world’s largest banks. Its mission is to lead the banking industry in collectively directing capital towards environmentally and socially sustainable economic development. The Bank 2030 project asks how banks can help peak and lock-in declining greenhouse gas emissions. To do this, the project will analyze the best practices for financing a low-carbon economy. It will showcase innovative thinking and strategic leadership, as well as highlighting opportunities not yet grasped and, as important, the barriers there are to allocating more capital to economic activities that would reduce greenhouse gas emissions.
- **CDP Matchmaker:** Through philanthropy and engagement, we are supporting CDP’s Matchmaker program, which helps cities overcome barriers to financing municipal green infrastructure projects. Our grant supports this work in cities nationwide, helping match cities with financiers, including impact investors.

**Engagement activities, associations, memberships or efforts where we are a signatory include:**
- CDP signatory
- CDP Supply Chain
- Ceres
- Equator Principles
- e-Stewards Enterprise
- Green Bond Principles
- RE100
- UN Principles for Responsible Investment (UNPRI) (Wells Fargo Capital Management)
- US Alliance for Sustainable Finance (USASF)
- U.S. Green Building Council
C12.3f

What processes do you have in place to ensure that all of your direct and indirect activities that influence policy are consistent with your overall climate change strategy?

Wells Fargo has a number of processes in place designed to help ensure consistency with respect to supporting activities that may influence climate change policy. Greater work is needed to ensure uniformity across the company. Direct activities related to climate change are limited to working collaboratively with organizations and cities that want to find positive solutions to climate change issues. In such cases, Wells Fargo’s Sustainability and Corporate Responsibility team is engaged to help ensure consistency. Importantly, Wells Fargo’s corporate values, as articulated in its Vision, Values and Goals and our environmental commitment, guide our decisions and priorities. We value doing what’s right for our customers, for our communities and for our environment.

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 mainstream reports

Status  
Complete

Attach the document  
2018-annual-report.pdf

Page/Section reference  
Pages 6, 17, and 42

Content elements  
Emissions figures
Other, please specify (Stakeholder engagement)

Comment  

Publication  
In mainstream reports

Status  
Complete

Attach the document  
2019-proxy-statement.pdf

Page/Section reference  
Pages ii, iii, vi, 8, 9, 18, 25, 27, 44, 46, 47, 48, 49

Content elements  
Governance
Strategy
Risks & opportunities
Emission targets

Comment  

Publication  
In voluntary sustainability report

Status  
Complete

Attach the document
Throughout the report; main sections are pages 26, 27, and environmental sustainability section starting on page 56

**Content elements**
- Governance
- Strategy
- Risks & opportunities
- Emissions figures
- Emission targets
- Other metrics

**Comment**

**Publication**
In voluntary communications

**Status**
Complete

**Attach the document**
gri-environmental-indicators.pdf

**Page/Section reference**
Entire document

**Content elements**
- Emissions figures
- Emission targets
- Other metrics

**Comment**

**Publication**
Other, please specify (wellsfargo.com)

**Status**
Complete

**Attach the document**

**Page/Section reference**
Environmental and Social Risk Management Framework

**Content elements**
- Governance
- Strategy
- Risks & opportunities
- Other metrics

**Comment**

**Publication**
In voluntary communications

**Status**
Complete

**Attach the document**
esrm-framework.pdf

**Page/Section reference**
Entire document

**Content elements**
- Strategy
Risks & opportunities
Other metrics
Comment

C14. Signoff

C-FI

(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.

C14.1

(C14.1) Provide details for the person that has signed off (approved) your CDP climate change response.

<table>
<thead>
<tr>
<th>Job title</th>
<th>Corresponding job category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Row 1 EVP, Sustainability and Corporate Responsibility</td>
<td>Chief Sustainability Officer (CSO)</td>
</tr>
</tbody>
</table>

SC. Supply chain module

SC0.0

(SC0.0) If you would like to do so, please provide a separate introduction to this module.

Wells Fargo is pleased to be asked to respond and to be engaged with our customers via the CDP supply chain process. We are also one of approximately 115 CDP supply chain members, and we are therefore asking that a portion of our suppliers also respond to CDP supply chain

SC0.1

(SC0.1) What is your company’s annual revenue for the stated reporting period?

<table>
<thead>
<tr>
<th>Annual Revenue</th>
</tr>
</thead>
<tbody>
<tr>
<td>86408000000</td>
</tr>
</tbody>
</table>

SC0.2

(SC0.2) Do you have an ISIN for your company that you would be willing to share with CDP?

Yes
SC0.2a

(SC0.2a) Please use the table below to share your ISIN.

<table>
<thead>
<tr>
<th>ISIN country code (2 letters)</th>
<th>ISIN numeric identifier and single check digit (10 numbers overall)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Row 1</td>
<td>US 9497461015</td>
</tr>
</tbody>
</table>

SC1.1

(SC1.1) Allocate your emissions to your customers listed below according to the goods or services you have sold them in this reporting period.

- **Requesting member**
  - CVS Health

- **Scope of emissions**
  - Scope 1

- **Allocation level**
  - Company wide

- **Allocation level detail**
  - <Not Applicable>

- **Emissions in metric tonnes of CO2e**
  - 39

- **Uncertainty (±%)**
  - 20

- **Major sources of emissions**
  - Stationary and mobile combustion of fuels, refrigerants, and fire suppressants

- **Verified**
  - No

- **Allocation method**
  - Allocation based on the market value of products purchased

**Please explain how you have identified the GHG source, including major limitations to this process and assumptions made**

Wells Fargo utilizes the operational control approach to account for our Scope 1 and 2 greenhouse gas emissions sources. This organizational structure includes owned/leased locations for Wells Fargo Bank and wholly-owned subsidiaries, as well as owned or leased vehicles. Wells Fargo's Corporate Properties Group generates a facility list of all domestic and international facilities using their SAP database to help ensure facilities are included in the inventory each year. Emission sources are identified based on their materiality to Wells Fargo's operations and their implications in a wider sustainability context.

- **Requesting member**
  - CVS Health

- **Scope of emissions**
  - Scope 2

- **Allocation level**
  - Company wide

- **Allocation level detail**
  - <Not Applicable>

- **Emissions in metric tonnes of CO2e**
  - 337
Uncertainty (±%)  
20

Major sources of emissions  
Purchased electricity, purchased chilled

Verified  
No

Allocation method  
Allocation based on the market value of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made  
Wells Fargo utilizes the operational control approach to account for our Scope 1 and 2 greenhouse gas emissions sources. This organizational structure includes owned/leased locations for Wells Fargo Bank and wholly-owned subsidiaries, as well as owned or leased vehicles. Wells Fargo's Corporate Properties Group generates a facility list of all domestic and international facilities using their SAP database to help ensure facilities are included in the inventory each year. Emission sources are identified based on their materiality to Wells Fargo's operations and their implications in a wider sustainability context.

Requesting member  
HP Inc

Scope of emissions  
Scope 1

Allocation level  
Company wide

Allocation level detail  
<Not Applicable>

Emissions in metric tonnes of CO2e  
3

Uncertainty (±%)  
20

Major sources of emissions  
Stationary and mobile combustion of fuels, refrigerants, and fire suppressants

Verified  
No

Allocation method  
Allocation based on the market value of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made  
Wells Fargo utilizes the operational control approach to account for our Scope 1 and 2 greenhouse gas emissions sources. This organizational structure includes owned/leased locations for Wells Fargo Bank and wholly-owned subsidiaries, as well as owned or leased vehicles. Wells Fargo's Corporate Properties Group generates a facility list of all domestic and international facilities using their SAP database to help ensure facilities are included in the inventory each year. Emission sources are identified based on their materiality to Wells Fargo's operations and their implications in a wider sustainability context.
Uncertainty (±%)  
20

Major sources of emissions  
Purchased electricity, purchased chilled water, and purchased steam

Verified  
No

Allocation method  
Allocation based on the market value of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made  
Wells Fargo utilizes the operational control approach to account for our Scope 1 and 2 greenhouse gas emissions sources. This organizational structure includes owned/leased locations for Wells Fargo Bank and wholly-owned subsidiaries, as well as owned or leased vehicles. Wells Fargo’s Corporate Properties Group generates a facility list of all domestic and international facilities using their SAP database to help ensure facilities are included in the inventory each year. Emission sources are identified based on their materiality to Wells Fargo’s operations and their implications in a wider sustainability context.

Requesting member  
MetLife, Inc.

Scope of emissions  
Scope 1

Allocation level  
Company wide

Allocation level detail  
<Not Applicable>

Emissions in metric tonnes of CO2e  
44

Uncertainty (±%)  
20

Major sources of emissions  
Stationary and mobile combustion of fuels, refrigerants, and fire suppressants

Verified  
No

Allocation method  
Allocation based on the market value of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made  
Wells Fargo utilizes the operational control approach to account for our Scope 1 and 2 greenhouse gas emissions sources. This organizational structure includes owned/leased locations for Wells Fargo Bank and wholly-owned subsidiaries, as well as owned or leased vehicles. Wells Fargo’s Corporate Properties Group generates a facility list of all domestic and international facilities using their SAP database to help ensure facilities are included in the inventory each year. Emission sources are identified based on their materiality to Wells Fargo’s operations and their implications in a wider sustainability context.

Requesting member  
MetLife, Inc.

Scope of emissions  
Scope 1

Allocation level  
Company wide

Allocation level detail  
<Not Applicable>

Emissions in metric tonnes of CO2e  
44
Uncertainty (±%)  
20

Major sources of emissions  
Stationary and mobile combustion of fuels, refrigerants, and fire suppressants

Verified  
No

Allocation method  
Allocation based on the market value of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made  
Wells Fargo utilizes the operational control approach to account for our Scope 1 and 2 greenhouse gas emissions sources. This organizational structure includes owned/leased locations for Wells Fargo Bank and wholly-owned subsidiaries, as well as owned or leased vehicles. Wells Fargo's Corporate Properties Group generates a facility list of all domestic and international facilities using their SAP database to help ensure facilities are included in the inventory each year. Emission sources are identified based on their materiality to Wells Fargo's operations and their implications in a wider sustainability context.

Requesting member  
MetLife, Inc.

Scope of emissions  
Scope 2

Allocation level  
Company wide

Allocation level detail  
<Not Applicable>

Emissions in metric tonnes of CO2e  
385

Uncertainty (±%)  
20

Major sources of emissions  
Stationary and mobile combustion of fuels, refrigerants, and fire suppressants

Verified  
No

Allocation method  
Allocation based on the market value of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made  
Wells Fargo utilizes the operational control approach to account for our Scope 1 and 2 greenhouse gas emissions sources. This organizational structure includes owned/leased locations for Wells Fargo Bank and wholly-owned subsidiaries, as well as owned or leased vehicles. Wells Fargo's Corporate Properties Group generates a facility list of all domestic and international facilities using their SAP database to help ensure facilities are included in the inventory each year. Emission sources are identified based on their materiality to Wells Fargo's operations and their implications in a wider sustainability context.

Requesting member  
NRG Energy Inc

Scope of emissions  
Scope 1

Allocation level  
Company wide

Allocation level detail  
<Not Applicable>

Emissions in metric tonnes of CO2e  
0
Uncertainty (±%)
20

Major sources of emissions
Stationary and mobile combustion of fuels, refrigerants, and fire suppressants

Verified
No

Allocation method
Allocation based on the market value of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
Wells Fargo utilizes the operational control approach to account for our Scope 1 and 2 greenhouse gas emissions sources. This organizational structure includes owned/leased locations for Wells Fargo Bank and wholly-owned subsidiaries, as well as owned or leased vehicles. Wells Fargo’s Corporate Properties Group generates a facility list of all domestic and international facilities using their SAP database to help ensure facilities are included in the inventory each year. Emission sources are identified based on their materiality to Wells Fargo’s operations and their implications in a wider sustainability context.

Requesting member
NRG Energy Inc

Scope of emissions
Scope 2

Allocation level
Company wide

Allocation level detail
<Not Applicable>

Emissions in metric tonnes of CO2e
2

Uncertainty (±%)
20

Major sources of emissions
Stationary and mobile combustion of fuels, refrigerants, and fire suppressants

Verified
No

Allocation method
Allocation based on the market value of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
Wells Fargo utilizes the operational control approach to account for our Scope 1 and 2 greenhouse gas emissions sources. This organizational structure includes owned/leased locations for Wells Fargo Bank and wholly-owned subsidiaries, as well as owned or leased vehicles. Wells Fargo’s Corporate Properties Group generates a facility list of all domestic and international facilities using their SAP database to help ensure facilities are included in the inventory each year. Emission sources are identified based on their materiality to Wells Fargo’s operations and their implications in a wider sustainability context.

Requesting member
Stanley Black & Decker, Inc.

Scope of emissions
Scope 1

Allocation level
Company wide

Allocation level detail
<Not Applicable>

Emissions in metric tonnes of CO2e
4
Uncertainty (±%) 20

Major sources of emissions
Stationary and mobile combustion of fuels, refrigerants, and fire suppressants

Verified No

Allocation method
Allocation based on the market value of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
Wells Fargo utilizes the operational control approach to account for our Scope 1 and 2 greenhouse gas emissions sources. This organizational structure includes owned/leased locations for Wells Fargo Bank and wholly-owned subsidiaries, as well as owned or leased vehicles. Wells Fargo’s Corporate Properties Group generates a facility list of all domestic and international facilities using their SAP database to help ensure facilities are included in the inventory each year. Emission sources are identified based on their materiality to Wells Fargo’s operations and their implications in a wider sustainability context.

Requesting member
Stanley Black & Decker, Inc.

Scope of emissions
Scope 2

Allocation level
Company wide

Allocation level detail
<Not Applicable>

Emissions in metric tonnes of CO2e
37

Uncertainty (±%) 20

Major sources of emissions
Stationary and mobile combustion of fuels, refrigerants, and fire suppressants

Verified No

Allocation method
Allocation based on the market value of products purchased

Please explain how you have identified the GHG source, including major limitations to this process and assumptions made
Wells Fargo utilizes the operational control approach to account for our Scope 1 and 2 greenhouse gas emissions sources. This organizational structure includes owned/leased locations for Wells Fargo Bank and wholly-owned subsidiaries, as well as owned or leased vehicles. Wells Fargo’s Corporate Properties Group generates a facility list of all domestic and international facilities using their SAP database to help ensure facilities are included in the inventory each year. Emission sources are identified based on their materiality to Wells Fargo’s operations and their implications in a wider sustainability context.
Wells Fargo does not use published industry average data to complete SC1.1. Instead, we rely on our own calculated scope 1 and scope 2 emissions, our total revenue, and the revenue of each requesting customer to allocate emissions to each customer. The goods and services Wells Fargo produces are mainly non-physical, therefore we use an economic allocation approach based on market value, as defined by the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard. The market value used in revenue. Scope 1 emissions are allocated to each customer by multiplying Wells Fargo's corporate scope 1 emissions by the ratio of the customer's spend with Wells Fargo versus our total annual revenue. The same approach is followed for scope 2 emissions.

SC1.3

**(SC1.3)** What are the challenges in allocating emissions to different customers, and what would help you to overcome these challenges?

<table>
<thead>
<tr>
<th>Allocation challenges</th>
<th>Please explain what would help you overcome these challenges</th>
</tr>
</thead>
<tbody>
<tr>
<td>Diversity of product lines makes accurately accounting for each product/product line cost ineffective</td>
<td>Our emissions are primarily generated by our facilities, each of which can support a range of products and product lines. As a result, the economic allocation method is the most appropriate for our business.</td>
</tr>
</tbody>
</table>

SC1.4

**(SC1.4)** Do you plan to develop your capabilities to allocate emissions to your customers in the future?

No

SC1.4b

**(SC1.4b)** Explain why you do not plan to develop capabilities to allocate emissions to your customers.

We do not plan to develop capabilities to allocate emissions to our customers because the economic allocation approach that is currently used is the most appropriate approach for the foreseeable future.

SC2.1

**(SC2.1)** Please propose any mutually beneficial climate-related projects you could collaborate on with specific CDP Supply Chain members.

SC2.2

**(SC2.2)** Have requests or initiatives by CDP Supply Chain members prompted your organization to take organizational-level emissions reduction initiatives?

No

SC3.1

**(SC3.1)** Do you want to enroll in the 2019-2020 CDP Action Exchange initiative?

No
SC3.2

(SC3.2) Is your company a participating supplier in CDP’s 2018-2019 Action Exchange initiative?
No

SC4.1

(SC4.1) Are you providing product level data for your organization's goods or services?
No, I am not providing data

Submit your response

In which language are you submitting your response?
English

Please confirm how your response should be handled by CDP

<table>
<thead>
<tr>
<th>I am submitting my response</th>
<th>Public or Non-Public Submission</th>
<th>I am submitting to</th>
<th>Are you ready to submit the additional Supply Chain Questions?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Public</td>
<td>Investors</td>
<td>Yes, submit Supply Chain Questions now</td>
</tr>
</tbody>
</table>

Please confirm below

I have read and accept the applicable Terms