Climate Change 2015 Information Request
U.S. Bancorp

Module: Introduction

Page: Introduction

CC0.1
Introduction
Please give a general description and introduction to your organization.

U.S. Bancorp is a diversified financial services holding company and parent company of U.S. Bank National Association, the nation's fifth-largest commercial bank. U.S. Bancorp was named Fortune Magazine's 2015 Most Admired Superregional Bank (fifth year in a row). U.S. Bancorp provides a wide range of financial services for consumers, businesses, government entities and other financial institutions. U.S. Bank's branch network serves 25 states, and offers regional consumer and business banking and wealth management services, national wholesale and trust services and global payments services to more than 18.5 million customers. Headquartered in Minneapolis, U.S. Bank was founded in 1863 under national Charter #24 and is the nation's second oldest bank operating under its original charter. Visit U.S. Bancorp on the web at usbank.com

CC0.2
Reporting Year
Please state the start and end date of the year for which you are reporting data.
The current reporting year is the latest/most recent 12-month period for which data is reported. Enter the dates of this year first.
We request data for more than one reporting period for some emission accounting questions. Please provide data for the three years prior to the current reporting year if you have not provided this information before, or if this is the first time you have answered a CDP information request. (This does not apply if you have been offered and selected the option of answering the shorter questionnaire). If you are going to provide additional years of data, please give the dates of those reporting periods here. Work backwards from the most recent reporting year.
Please enter dates in following format: day(DD)/month(MM)/year(YYYY) (i.e. 31/01/2001).

Enter Periods that will be disclosed
Wed 01 Jan 2014 - Wed 31 Dec 2014

CC0.3
Country list configuration

Please select the countries for which you will be supplying data. If you are responding to the Electric Utilities module, this selection will be carried forward to assist you in completing your response.

Select country
United States of America
Ireland

CC0.4
Currency selection

Please select the currency in which you would like to submit your response. All financial information contained in the response should be in this currency.

USD($)

CC0.6
Modules
As part of the request for information on behalf of investors, electric utilities, companies with electric utility activities or assets, companies in the automobile or auto component manufacture sub-industries, companies in the oil and gas sub-industries, companies in the information technology and telecommunications sectors and companies in the food, beverage and tobacco industry group should complete supplementary questions in addition to the main questionnaire.
If you are in these sector groupings (according to the Global Industry Classification Standard (GICS)), the corresponding sector modules will not appear below but will automatically appear in the navigation bar when you save this page. If you want to query your classification, please email respond@cdp.net.
If you have not been presented with a sector module that you consider would be appropriate for your company to answer, please select the module below. If you wish to view the questions first, please see https://www.cdp.net/en-US/Programmes/Pages/More-questionnaires.aspx.

Further Information

Module: Management

Page: CC1. Governance

CC1.1

Where is the highest level of direct responsibility for climate change within your organization?

Board or individual/sub-set of the Board or other committee appointed by the Board

CC1.1a

Please identify the position of the individual or name of the committee with this responsibility

The SVP & Director of Environmental Affairs is directly responsible for climate change within the company. This role reports up through the Strategy and Corporate Affairs division under the CFO organization, and works directly with other senior business line leaders throughout the company through direct interaction and involvement through the Environmental Stewardship Council (Council). The Council is comprised of key senior business line leaders that meet every 8-10 weeks to lead the development and implementation of our environmental strategy across the organization. The Council is overseen by a team of stakeholders comprised of three Vice Chairs and other key executive leaders. The Council is divided into sub-teams that meet on a more frequent basis as needed to focus on specific areas of our policy and initiatives. The Community Reinvestment and Public Policy Committee of the company's Board of Directors has formal responsibility for the oversight of the company's environmental sustainability program, including climate change. Written and/or verbal updates are provided to this Committee on a regular basis on the strategies, progress, and results of the program

CC1.2

Do you provide incentives for the management of climate change issues, including the attainment of targets?

Yes

CC1.2a

Please provide further details on the incentives provided for the management of climate change issues

Who is entitled to benefit from these incentives?	The type of incentives	Incentivized performance indicator	Comment
Environment/Sustainability managers	Monetary reward	Behaviour change related indicator	Communicating climate change issues, driving momentum towards addressing climate change issues and overall sustainability commitments, including those which result in reduced GHG emissions, both internally and externally with our customer base
Energy managers	Monetary reward	Energy reduction project	Overall improvement in energy consumption which has a direct correlation with reduced GHG emissions
All employees	Recognition (non-monetary)	Behaviour change related indicator	Development and implementation of sustainability initiatives, including those which have direct impact on emissions reduction such as energy reduction and transportation initiatives
All employees	Other non-monetary reward	Behaviour change related indicator	Development and implementation of sustainability initiatives, including those which have direct impact on emissions reduction such as energy reduction and transportation initiatives
Business unit managers	Monetary reward	Emissions reduction project	Lending/investing/tax credit financing of projects within the solar/renewable energy industry through our community development corporation. These projects help customers reduce or avoid GHG emissions.
Other: Environmental Stewardship Council members	Recognition (non-monetary)	Behaviour change related indicator	Overall attainment of goals and momentum on broad sustainability initiatives, including those which have direct impact on reduced emissions.
Facility managers	Monetary reward	Energy reduction project	Overall improvement in energy consumption in the lowest performing facilities in their portfolio which has a direct correlation with reduced GHG emissions

Further Information

Page: CC2. Strategy

CC2.1

Please select the option that best describes your risk management procedures with regard to climate change risks and opportunities

Integrated into multi-disciplinary company wide risk management processes

CC2.1a

Please provide further details on your risk management procedures with regard to climate change risks and opportunities

Frequency of monitoring	To whom are results reported?	Geographical areas considered	How far into the future are risks considered?	Comment
Six-monthly or more frequently	Other committee	National	3 to 6 years	Our risk management procedures vary across types of potential risks (asset level, portfolio risk, reputational risk, etc.) In general, the timeframe looks out up to five years (consistent with average terms of review/renewal in our lending portfolios). Depending on

Frequency of monitoring	To whom are results reported?	Geographical areas considered	How far into the future are risks considered?	Comment
				nature and severity of the risk identified, the results are reported up through the impacted business line risk division, the corporate-wide risk division, the environmental stewardship council and/or the governing committee of the Board. Our focus is mainly on national (U.S.), but some international focus as well

CC2.1b
Please describe how your risk and opportunity identification processes are applied at both company and asset level

We have various risk and opportunity identification processes throughout the company. Our enterprise risk management policy covers management of risks that may negatively impact the Company, including credit, financial, liquidity, market, operational, reputational, strategic, and other risks as appropriate. In addition, every business line within the company has a team specifically focused on all types of risks, both at the business unit level (i.e. risk in lending portfolio or product specific risk), risks at the asset level (i.e. corporate real estate for our facilities and credit risk for assets within our portfolio), and risks at the company level (reputational risk or supply chain risk). As risks are identified and addressed, our business lines are simultaneously looking at ways to turn these to opportunities for additional product development/sales, and/or cost savings. In 2012 a specific expectation for environmental risk monitoring was incorporated into the performance goals of one of the members in our wholesale bank.

CC2.1c
How do you prioritize the risks and opportunities identified?

Through our enterprise-wide and business-line risk management processes, we are prudent in our undertaking of risk and our processes ensure we are adequately compensated for those risks where appropriate. We utilize a multiple line of defense approach in the prioritization of risk, looking at business line risk management, corporate-level risk management and assurance/validation/verification of our risk management processes, with escalation processes and procedures clearly defined. Specifically related to climate change, we would prioritize risks based on the likelihood and significance of the potential financial and/or reputational impact to the company. From an opportunities perspective, as risks are identified and addressed, business lines simultaneously look for ways to turn these into opportunities for additional product development/sales, and/or cost savings, and opportunities are typically prioritized by creation of positive operating leverage (balancing the revenue potential with the development expense).

CC2.2
Is climate change integrated into your business strategy?

Yes

CC2.2a
Please describe the process of how climate change is integrated into your business strategy and any outcomes of this process

1. Climate change is integrated into our business strategy due to its broad array of potential impacts (both positive and negative), whether direct (to company assets or business opportunities/approach) or indirect (reputational). We continue to expand our internal communication through use of shared databases and specific presentations to educate and inform various business lines about issues and opportunities so that each business line can use that information into their business strategies. We have resources within our environmental stewardship council and within business lines that work to continually expand/integrate climate change risks/opportunities into business strategies.
2. Various aspects of climate change have influenced our strategy, including regulatory, adaptation, customer demand, and new business opportunities. As regulatory/legislative measures are implemented, there is direct impact to opportunities (new products/services to help customers meet the requirements), business practices (ensuring our compliance with applicable requirements), and risk (will the requirements result in a negative impact on ability to do business or cost to do business for our company and our customers). Our Environmental Stewardship Council and other feedback mechanisms ensure the communication is shared with the appropriate parties to prioritize the identified risks/opportunities. Our extensive risk infrastructure monitors and helps mitigate risks due to climate change such as disaster recovery in the event of severe weather instances.
3. The most important components of our short term strategy (0-2 years) are addressing regulatory/legislative requirements, reviewing potential climate change risk/opportunity in our credit portfolios, and our approach to continuous improvement in reducing our consumption of natural resources (energy, paper, etc).
4. The most important components of our long term strategy that have been influenced are our approach to building design and retrofits (designed for energy/environmental efficiency), development of technologies to electronify existing paper-based processes, continuing to expanded the due diligence in our lending portfolios to help mitigate risk, and more specific focus on methods to capitalize on the opportunities created by climate change as identified through our various internal risk/opportunity identification methods such as increased lending and investments in the renewable energy space. (note: long term generally defined as greater than two years)
5. In today's environment, customers, investors and employees are increasingly aware of the importance of sustainability in the companies they interact with, and therefore communication to those constituents about our approach, and providing tools and resources to educate and engage our customers, becomes more and more important and can help us gain competitive advantage.
6. Some key business decisions that have been made are our focus on the use of Energy Star Portfolio Manager to help benchmark performance and prioritize investment in our facilities. Also, we have continued to expand the due diligence in our lending portfolios to businesses with potentially high environmental impact.

CC2.2c
Does your company use an internal price of carbon?

No, and we currently don't anticipate doing so in the next 2 years

CC2.3

Do you engage in activities that could either directly or indirectly influence public policy on climate change through any of the following? (tick all that apply)

Trade associations

CC2.3b

Are you on the Board of any trade associations or provide funding beyond membership?

Yes

CC2.3c

Please enter the details of those trade associations that are likely to take a position on climate change legislation

Trade association	Is your position on climate change consistent with theirs?	Please explain the trade association's position	How have you, or are you attempting to, influence the position?
Environmental Bankers Association	Consistent	General understanding of environmental risk, including understanding climate change and associated risks and mitigation opportunities for financial institutions.	As co-chair of the Global Sustainability Issues sub-committee, our representation continues to raise awareness of new risks and opportunities for overall membership of the EBA.

CC2.3h

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?

Direct and indirect activities are minimal at this time and all are reviewed and approved by a level of senior management not more than three levels removed from the CEO.

CC2.4

Would your organization's board of directors support an international agreement between governments on climate change, which seeks to limit global temperature rise to under two degree Celsius from pre-industrial levels in line with IPCC scenarios such as RCP2.6?

No opinion

CC2.4a

Please describe your board's position on what an effective agreement would mean for your organization and activities that you are undertaking to help deliver this agreement at the 2015 United Nations Climate Change Conference in Paris (COP 21)

Further Information

Page: CC3. Targets and Initiatives

CC3.1

Did you have an emissions reduction target that was active (ongoing or reached completion) in the reporting year?

No

CC3.1e

Please explain (i) why you do not have a target; and (ii) forecast how your emissions will change over the next five years

We do not have a reduction target for our emissions. In 2012, we began formal goal-setting discussions which continued into 2014. While we have not published a public target, we continue to invest significantly in our efforts to 1) track and measure and 2) reduce our emissions. Due to the current climate within the financial services industry in the U.S., we must always be prepared to act in a way that balances the needs of all of our constituents and does not outweigh one in favor of another, which could impact the allocation of future resources. ii. Until our formal target is announced, our goal is to continue to reduce our relative emissions over the next 5 years, with year-over-year decreases likely to be in the 1-3% range.

CC3.2

Does the use of your goods and/or services directly enable GHG emissions to be avoided by a third party?

Yes

CC3.2a

Please provide details of how the use of your goods and/or services directly enable GHG emissions to be avoided by a third party

i. A variety of our products and services allow our customers to directly reduce their GHG emissions. Our green auto loan (providing a significant rate discount to customers) rewards customers for purchasing vehicles with certified low emissions. We have provided significant levels of financing to LEED certified commercial real estate construction and energy efficiency retrofits. In addition, we are a leading provider of

electronic/online/mobile financial services allowing customers to eliminate transportation emissions typically generated by transacting business in person or via mail. We offer a reduced-rate loan product to consumers rewarding them for installing measures to reduce their energy consumption and emissions in their homes. We are a founding member of the PayItGreen alliance, which is an online resource for all consumers and businesses providing them education around how to specifically reduce their emissions through the use of products and services such as ours.
Through our lending and investment in solar and other renewable technologies, others are able to utilize renewable energy and avoid scope 2 emissions from purchased electricity.
ii. Of the initiatives mentioned above, our mobile deposit product allows our customers to directly reduce their Scope 1 GHG emissions by avoiding emissions associated with the travel to a branch/atm to make a deposit. Also, through our funding of residential solar initiatives, the U.S. Bancorp Community Development Corporation has funded several hundred megawatts of residential solar since 2008 - enough to fully power tens of thousands of homes across the United States, allowing them to directly reduce their Scope 2 emissions.

ii. Many services we offer provide an immediate reduction in emissions (i.e. mobile deposit) while others provide reductions over a longer timeframe (i.e. lending for solar installations). Due to the variances in other emissions avoided and geographies associated with such emissions avoidance, such as lending for energy efficiency improvements, or offering a mobile-deposit service that allows a customer to deposit a check via mobile phone instead of driving to a branch, the quantity of all of our efforts cannot be specifically calculated. However, an example of the impact of our mobile deposit product is that for every 100,000 customers that utilize the mobile deposit product to deposit one check per month instead of driving to a branch/ATM, a total of 493 metric tons of Scope 1 CO2 emissions are avoided.

iii. To calculate the emissions avoidance in the example above for mobile deposits, we calculated 100,000 customers x 12 deposits per year x 1 mile travel avoided by not going to branch/atm x .411 kgs CO2 per mile driven in a passenger vehicle (CO2 emissions data taken from http://www.epa.gov/otaq/climate/documents/420f14040a.pdf).

iv. We are not considering generating any type of offsets/credits at this time.

CC3.3

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

Yes

CC3.3a

Please identify the total number of projects at each stage of development, and for those in the implementation stages, the estimated CO2e savings

Stage of development	Number of projects	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Under investigation	18	
To be implemented*	2	30
Implementation commenced*	3	520
Implemented*	28	4094
Not to be implemented	0	

CC3.3b

For those initiatives implemented in the reporting year, please provide details in the table below

Activity type	Description of activity	Estimated annual CO2e savings (metric tonnes CO2e)	Scope	Voluntary/ Mandatory	Annual monetary savings (unit currency - as specified in CC0.4)	Investment required (unit currency - as specified in CC0.4)	Payback period	Estimated lifetime of the initiative	Comment
Energy efficiency: Building services	i Voluntary lighting retrofits have been performed on numerous facilities and will continue based on our prioritized list of facilities. ii. Impact will be on Scope 2 emissions (energy purchased). iii. This is voluntary. iv. Lifetime of the benefit of this activity is	3281	Scope 2	Voluntary	323205	1419000	4-10 years	16-20 years	

Activity type	Description of activity	Estimated annual CO2e savings (metric tonnes CO2e)	Scope	Voluntary/ Mandatory	Annual monetary savings (unit currency - as specified in CC0.4)	Investment required (unit currency - as specified in CC0.4)	Payback period	Estimated lifetime of the initiative	Comment
	permanent (or as long as facility is owned or operated).								
Energy efficiency: Building services	i. Voluntary energy efficiency projects (programmable thermostats, motion sensors, more efficient HVAC equipment) have been installed in numerous facilities and will continue based on our prioritized list of facilities. ii. Impact will be on Scope 2 emissions (energy purchased). iii. This is voluntary. iv. Lifetime of the benefit of this activity is dependent on the lifespan of the equipment (or as long as facility is owned or operated).	1042	Scope 2	Voluntary	136059	6802971	>25 years	Ongoing	These projects were not categorized as"energy efficiency" projects, rather equipment replacements with an energy efficiency element. Therefore, the number of projects was not counted and added to the "implemented" number in CC3.3a, above.
Low carbon energy installation	i. Voluntarily installed solar arrays at multiple locations in St. Louis, MO, that went on-line in mid 2014. ii. Impact will be on Scope 2 emissions. iii. This is voluntary iv. The lifetime benefit of this activity is expected to exceed 25 years, or as long as the facility is owned and operated.	57	Scope 2	Voluntary			<1 year	21-30 years	Set up as solar leases with no investment required and minimal monetary savings.
Other	i. Implementation of ongoing server consolidation and virtualization projects as well as UPS upgrades. ii.	756	Scope 2	Voluntary	99000	13725122	>25 years	16-20 years	

Activity type	Description of activity	Estimated annual CO2e savings (metric tonnes CO2e)	Scope	Voluntary/ Mandatory	Annual monetary savings (unit currency - as specified in CC0.4)	Investment required (unit currency - as specified in CC0.4)	Payback period	Estimated lifetime of the initiative	Comment
	Impact will be on Scope 2 emissions (energy purchased). iii. This is voluntary. iv. Lifetime of the benefit of this activity is dependent on the projected life of the equipment, anticipated to be >5 years								

CC3.3c
What methods do you use to drive investment in emissions reduction activities?

Method	Comment
Dedicated budget for energy efficiency	Our energy efficiency budget is allocated similarly to other operational budgets, using a combination of historical spend, proposed projects, and adjusted for any broad budget reductions/adjustments. We then use our EEM system and Energy Star Portfolio manager to help prioritize requests for budget. In addition, we incorporate information about areas with highest utility rates and incentives in the final prioritization of projects to ensure we get the best return on our investment, potentially creating opportunity to fund additional projects.
Employee engagement	Through active employee engagement, grassroots teams are influencing business decisions that result in additional investment in emissions reduction activities.
Internal finance mechanisms	All newly built facilities are built to LEED certification standards. The increased costs associated with this level of investment are incorporated into the operating budget of our real estate division.

Further Information

Page: CC4. Communication

CC4.1
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	Status	Page/Section reference	Attach the document
No			

Further Information

We have published a Corporate Citizenship Report in previous years, and plan to do so in future years, with our environmental performance information, but unforeseen circumstances have caused us to skip the report for 2014 information. We plan to publish this again with 2015 information.

Module: Risks and Opportunities

Page: CC5. Climate Change Risks

CC5.1
Have you identified any inherent climate change risks that have the potential to generate a substantive change in your business operations, revenue or expenditure? Tick all that apply

CC5.1d

Please explain why you do not consider your company to be exposed to inherent risks driven by changes in regulation that have the potential to generate a substantive change in your business operations, revenue or expenditure

While we do believe that there are risks driven by changes in regulation that will impact both us as an organization and the customers with whom we do business, we do not believe that there is an imminent potential that they will generate a substantive change in our business. We continue to monitor and as these evolve over time, we can adapt existing business processes as necessary.
From an operational perspective, our facilities are not significant producers of GHG emissions and would likely not be impacted, however fuel/energy tax regulations and other regulations might increase our cost of doing business, but not substantively and not inproportionately with our competition.
We do a significant amount of lending to customers that could be impacted by regulation as well, however with our diverse business and geographic mix, we maintain a balanced portfolio that again would not be substantively or inproportionately impacted relative to our competition.
We will continue to monitor and as regulations evolve over time, we will adapt as necessary.

CC5.1e

Please explain why you do not consider your company to be exposed to inherent risks driven by physical climate parameters that have the potential to generate a substantive change in your business operations, revenue or expenditure

While we do believe that there are risks driven by changes in physical climate that will impact both us as an organization and the customers with whom we do business, we do not believe that there is an imminent potential that they will generate a substantive change in our business.
Due to the breadth of our geographic physical presence and the geographic diversity of our loan portfolios, severe weather events would have limited impact due to increased operational costs or temporary increases in customer inability to repay debt. However, the same diversity in our lending portfolios creates opportunities for us to work with our customers leveraging opportunities created by changes in weather patterns (i.e. increased agriculture lending in new markets) or in mitigating risks and recovering from impacts of severe events.
We will continue to monitor and as this evolves over time, we will adapt existing business processes as necessary.

CC5.1f

Please explain why you do not consider your company to be exposed to inherent risks driven by changes in other climate-related developments that have the potential to generate a substantive change in your business operations, revenue or expenditure

While we do believe that there are risks driven by changes in other climate-related that will impact both us as an organization and the customers with whom we do business, we do not believe that there is an imminent potential that they will generate a substantive change in our business.
Potential risks such as reputational impact, changing consumer behavior, changing socioeconomic conditions, are likely, but we do not believe significant enough to generate substantive change. We continue to monitor and as these evolve over time, we can adapt existing business processes as necessary.

Further Information

Page: CC6. Climate Change Opportunities

CC6.1

Have you identified any inherent climate change opportunities that have the potential to generate a substantive change in your business operations, revenue or expenditure? Tick all that apply

CC6.1d

Please explain why you do not consider your company to be exposed to inherent opportunities driven by changes in regulation that have the potential to generate a substantive change in your business operations, revenue or expenditure

While we do believe that there are opportunities driven by changes in regulation that will impact both us as an organization and the customers with whom we do business, we do not believe that there is an imminent potential that they will generate a substantive change in our business.
For customers in industries that are impacted by changing regulation, it provides us an opportunity to expand our lending to fund adaptive measures. Depending on how the regulatory markets evolve over the future, it could also provide opportunity for expanded product and service offerings such as new technologies for energy efficiency, carbon trading/markets, renewables, etc.

CC6.1e

Please explain why you do not consider your company to be exposed to inherent opportunities driven by physical climate parameters that have the potential to generate a substantive change in your business operations, revenue or expenditure

While we do believe that there are opportunities driven by changes in physical climate that will impact us and the customers with whom we do business, we do not believe that there is an imminent potential that they will generate a substantive change in our business.
Changes in weather patterns/severe weather impacts could offer a variety of additional lending opportunities such as expanded tourism/ag lending in new, warmer markets, or rebuild/adaptation of existing real estate to prepare for changes.

CC6.1f

Please explain why you do not consider your company to be exposed to inherent opportunities driven by changes in other climate-related developments that have the potential to generate a substantive change in your business operations, revenue or expenditure

While we do believe that there are opportunities driven by changes in other climate-related developments that will impact us and the customers with whom we do business, we do not believe that there is an imminent potential that they will generate a substantive change in our business. These changes will tend to evolve more slowly. As customer expectations increase and consumer behavior changes, we will have an opportunity to leverage our efforts around environmental stewardship to generate positive perceptions that will strengthen our reputation and look to offer products/services that continue to meet and exceed customer expectations.

Further Information

Module: GHG Emissions Accounting, Energy and Fuel Use, and Trading

Page: CC7. Emissions Methodology

CC7.1
Please provide your base year and base year emissions (Scopes 1 and 2)

Scope	Base year	Base year emissions (metric tonnes CO2e)
Scope 1	Tue 01 Jan 2008 - Wed 31 Dec 2008	41138
Scope 2	Tue 01 Jan 2008 - Wed 31 Dec 2008	406436

CC7.2
Please give the name of the standard, protocol or methodology you have used to collect activity data and calculate Scope 1 and Scope 2 emissions

Please select the published methodologies that you use
The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

CC7.2a
If you have selected "Other" in CC7.2 please provide details of the standard, protocol or methodology you have used to collect activity data and calculate Scope 1 and Scope 2 emissions

CC7.3
Please give the source for the global warming potentials you have used

Gas	Reference
CO2	IPCC Fourth Assessment Report (AR4 - 100 year)
N2O	IPCC Fourth Assessment Report (AR4 - 100 year)
CH4	IPCC Fourth Assessment Report (AR4 - 100 year)

CC7.4
Please give the emissions factors you have applied and their origin; alternatively, please attach an Excel spreadsheet with this data at the bottom of this page

Fuel/Material/Energy	Emission Factor	Unit	Reference
Natural gas	53.0748	Other: kg CO2e/MMBtu	US EPA MRR Final Rule (40 CFR 98) - Commercial Sector 2009
Distillate fuel oil No 2	74.2138	Other: kg CO2e/MMBtu	US EPA MRR Final Rule (40 CFR 98) - Commercial Sector 2009
Diesel/Gas oil	10.2441	Other: kg CO2e/MMBtu	US EPA MRR Final Rule (40 CFR 98) - Commercial Sector 2009
Propane	61.7138	Other: kg CO2e/MMBtu	US EPA MRR Final Rule (40 CFR 98) - Commercial Sector 2009
Jet gasoline	72.4738	Other: kg CO2e/MMBtu	US EPA MRR Final Rule (40 CFR 98) - Commercial Sector 2009
Steam	88.5639	Other: kg CO2e/MMBtu	US EIA Emissions Factors for Steam and Chilled Water
Cooling	632.4050	Other: grams CO2e per ton hour	US EIA Emissions Factors for Steam and Chilled Water
Motor gasoline	.4345	Other: kg CO2e per mile	Inventory of U.S. Greenhouse Gas Emissions and Sinks
Electricity		lb CO2 per MWh	eGRID 2012 v 1.0

Further Information

Note: For electricity, the factor varies by region.

Page: CC8. Emissions Data - (1 Jan 2014 - 31 Dec 2014)

CC8.1
Please select the boundary you are using for your Scope 1 and 2 greenhouse gas inventory

Operational control

CC8.2
Please provide your gross global Scope 1 emissions figures in metric tonnes CO2e

47512

CC8.3
Please provide your gross global Scope 2 emissions figures in metric tonnes CO2e

359662

CC8.4
Are there are any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure?

Yes

CC8.4a
Please provide details of the sources of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure

Source	Relevance of Scope 1 emissions from this source	Relevance of Scope 2 emissions excluded from this source	Explain why the source is excluded
Fugitive Emissions	Emissions are relevant but not yet calculated	No emissions from this source	This is not currently tracked and have not yet determined a confident estimation measure.
Emergency Generator Emissions (for those generators not yet reported)	Emissions are not relevant	No emissions from this source	We began tracking emissions from emergency generators in 2012 and have captured the fuel burned (CO2) from the large generators. In 2013 and 2014 we were able to capture the majority of smaller generators. But there are likely still small generators that are not being tracked/estimated (i.e. through acquisitions).
ATMs (owned and operated independently of our facilities that are not yet reported)	Emissions are not relevant	Emissions are not relevant	There are potentially ATMs with small energy consumption that are not being captured in our existing reporting though the emissions would not be relevant.

CC8.5
Please estimate the level of uncertainty of the total gross global Scope 1 and 2 emissions figures that you have supplied and specify the sources of uncertainty in your data gathering, handling and calculations

Scope	Uncertainty range	Main sources of uncertainty	Please expand on the uncertainty in your data
Scope 1	More than 5% but less than or equal to 10%	Data Gaps Assumptions Extrapolation Data Management	Data was not estimated for months when a utility bill is missing (very limited occurrence). Manual data input could create errors, but validation processes are in place to capture major errors. Assumptions made and noted in other sections of the CDP for business travel create some level of uncertainty. In addition, fuel oil purchases are done at inconsistent intervals and do not necessarily directly reflect consumption/emissions for that time period, and as noted in prior sections, there are still a number of small generators that are not currently tracked. Fugitive emissions are not currently captured, though processes are in place through our vendors to ensure limited refrigerant release (our primary source of fugitive emissions).
Scope 2	More than 5% but less than or equal to 10%	Data Gaps Assumptions Extrapolation Data Management	Data was not estimated/extrapolated for months when a utility bill is missing (though this is a very limited occurrence). Most of the data for scope 2 is through electronic data interchange, reducing manual input, though for those areas where manual input is required, validation processes are in place to capture major errors. As indicated previously, there are still some owned and operated ATMs where consumption is not currently tracked, though this usage is very small.

CC8.6
Please indicate the verification/assurance status that applies to your reported Scope 1 emissions

No third party verification or assurance

CC8.7
Please indicate the verification/assurance status that applies to your reported Scope 2 emissions

No third party verification or assurance

CC8.8
Please identify if any data points have been verified as part of the third party verification work undertaken, other than the verification of emissions figures reported in CC8.6, CC8.7 and CC14.2

Additional data points verified	Comment
No additional data verified	

CC8.9
Are carbon dioxide emissions from biologically sequestered carbon relevant to your organization?

No

Further Information

Page: CC9. Scope 1 Emissions Breakdown - (1 Jan 2014 - 31 Dec 2014)

CC9.1
Do you have Scope 1 emissions sources in more than one country?

Yes

CC9.1a
Please break down your total gross global Scope 1 emissions by country/region

Country/Region	Scope 1 metric tonnes CO2e
United States of America	47500
Ireland	12

CC9.2
Please indicate which other Scope 1 emissions breakdowns you are able to provide (tick all that apply)

By facility
By GHG type
By activity

CC9.2b
Please break down your total gross global Scope 1 emissions by facility

Facility	Scope 1 emissions (metric tonnes CO2e)	Latitude	Longitude
While we have the data at this level, due to the nature of our business, this level of detail is not relevant			

CC9.2c
Please break down your total gross global Scope 1 emissions by GHG type

GHG type	Scope 1 emissions (metric tonnes CO2e)
CO2	47441
CH4	26
N2O	46

CC9.2d
Please break down your total gross global Scope 1 emissions by activity

Activity	Scope 1 emissions (metric tonnes CO2e)
Mobile Combustion (transportation)	3482
Stationary Combustion (heat/generators)	44030

Further Information

Page: CC10. Scope 2 Emissions Breakdown - (1 Jan 2014 - 31 Dec 2014)

CC10.1
Do you have Scope 2 emissions sources in more than one country?

Yes

CC10.1a
Please break down your total gross global Scope 2 emissions and energy consumption by country/region

Country/Region	Scope 2 metric tonnes CO2e	Purchased and consumed electricity, heat, steam or cooling (MWh)	Purchased and consumed low carbon electricity, heat, steam or cooling accounted for in CC8.3 (MWh)
United States of America	358610	590014	1362
Ireland	1051	2295	0

CC10.2
Please indicate which other Scope 2 emissions breakdowns you are able to provide (tick all that apply)

By facility
By activity

CC10.2b
Please break down your total gross global Scope 2 emissions by facility

Facility	Scope 2 emissions (metric tonnes CO2e)
While we have the data at this level, due to the nature of our business, this level of detail is not relevant	

CC10.2c
Please break down your total gross global Scope 2 emissions by activity

Activity	Scope 2 emissions (metric tonnes CO2e)
Electricity consumption	342189
Purchased cooling (chilled water)	3026
Purchased heat (steam)	14446

Further Information

Page: CC11. Energy

CC11.1
What percentage of your total operational spend in the reporting year was on energy?

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

CC11.2
Please state how much fuel, electricity, heat, steam, and cooling in MWh your organization has purchased and consumed during the reporting year

Energy type	MWh
Fuel	249954
Electricity	527899
Heat	0
Steam	47580
Cooling	16829

CC11.3
Please complete the table by breaking down the total "Fuel" figure entered above by fuel type

Fuels	MWh
Diesel/Gas oil	6995
Jet gasoline	9770
Natural gas	232191
Distillate fuel oil No 2	173
Propane	825

CC11.4

Please provide details of the electricity, heat, steam or cooling amounts that were accounted at a low carbon emission factor in the Scope 2 figure reported in CC8.3

Basis for applying a low carbon emission factor	MWh associated with low carbon electricity, heat, steam or cooling	Comment
Grid connected low carbon electricity generation owned by company, no instruments created	31.4	Small solar installation at one of our facilities where power generated is used onsite.
Other		We do purchase some of our electricity in Oregon that is produced by wind, but do not include the low carbon factor in any of our emissions accounting.

Further Information

Page: CC12. Emissions Performance

CC12.1

How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to the previous year?

Decreased

CC12.1a

Please 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

Reason	Emissions value (percentage)	Direction of change	Comment
Emissions reduction activities	1.3	Decrease	Implementation of projects specific to energy reduction (lighting retrofits, server virtualization/consolidation, energy efficiency upgrades). In 2014, 5136 tons of CO2e were reduced by our emission reduction projects, and our total S1 and S2 emissions in the previous year was 410,204 metric tons CO2e, therefore we arrived at 1.3% through (5136/410204)*100 = 1.3%.
Divestment			
Acquisitions			
Mergers			
Change in output			
Change in methodology			
Change in boundary	.2	Increase	Added tracking of new sources of emissions (additional emergency generators). In 2014, 872 metric tons of CO2e were added due to new tracking of emergency generators, and our total S1 and S2 emissions in the previous year was 410,204 metric tons CO2e, therefore we arrived at 0.2% through (872/410204)*100 = 0.2%.
Change in physical operating conditions		No change	
Unidentified	.3	Increase	Our overall reduction in emissions from the previous year was 3,031 metric tons of CO2e. Accounting for the decrease of 5,136 due to "Emission Reduction Activities" and the increase of 872 from the "Change in Boundary", we arrived at 1,233 metric tones CO2e unidentified through (-5136 + 872 + X) = -3031 where X equals 1,233. With 1233 metric tons of CO2e unidentified and our total S1 and S2 emissions in the previous year of 410,204 metric tons CO2e, therefore we arrived at 0.3% through (1,233/410204)*100 = 0.3%.
Other			

CC12.2

Please describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tonnes CO2e per unit currency total revenue

Intensity figure	Metric numerator	Metric denominator	% change from previous year	Direction of change from previous year	Reason for change
.000020	metric tonnes CO2e	unit total revenue	3.5	Decrease	Increase in Revenue while emissions decreased slightly. Note: the intensity figure is flat year over year using six decimal places.

CC12.3

Please describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tonnes CO2e per full time equivalent (FTE) employee

Intensity figure	Metric numerator	Metric denominator	% change from previous year	Direction of change from previous year	Reason for change
6.33	metric tonnes CO2e	FTE employee	0.9	Decrease	FTE Increased slightly while emissions decreased.

CC12.4

Please provide an additional intensity (normalized) metric that is appropriate to your business operations

Intensity figure	Metric numerator	Metric denominator	% change from previous year	Direction of change from previous year	Reason for change
.01443	metric tonnes CO2e	square foot	6.7	Decrease	SF increased slightly while emissions decreased.

Further Information

Page: CC13. Emissions Trading

CC13.1

Do you participate in any emissions trading schemes?

No, and we do not currently anticipate doing so in the next 2 years

CC13.2

Has your organization originated any project-based carbon credits or purchased any within the reporting period?

No

Further Information

Page: CC14. Scope 3 Emissions

CC14.1

Please account for your organization's Scope 3 emissions, disclosing and explaining any exclusions

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using data obtained from suppliers or value chain partners	Explanation
Purchased goods and services	Relevant, not yet calculated				We have not yet determined a methodology for tracking and calculating emissions from purchased goods and services.
Capital goods	Relevant, not yet calculated				Due to the nature of our business, we do not extract or produce capital goods. The volume of emissions from transmission of capital goods purchased would be minimal. We have not yet determined a methodology for tracking and calculating emissions from purchased capital goods.
Fuel-and-energy-	Not evaluated				

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using data obtained from suppliers or value chain partners	Explanation
related activities (not included in Scope 1 or 2)					
Upstream transportation and distribution	Relevant, not yet calculated				In the past we provided an estimation of the impact of the upstream transportation of office products and supplies to our facilities. We did not receive this estimation from our vendor for 2014, nor have we evaluated or calculated the impact of other transportation/distribution such as couriers and armored vehicles.
Waste generated in operations	Relevant, calculated	6187	We used the EPA Waste Reduction Model to calculate estimated emissions impacts of waste to landfill, offset by traditional recycling. All national averages and prefilled data was utilized. http://epa.gov/epawaste/conserve/tools/warm/index.html#excel We are responsible for waste at approximately 2,000 sites. For approx 1,600 of those sites, we have volumes and estimated tonnage based on the following assumptions: That on the day of service the waste and or recycling containers are full. All pickups were made on the scheduled day(s) of service. Waste and recycling volumes were calculated at 75lbs per cubic yard. Recycling included was OCC, single stream, and organics.		Recycled confidential office paper (more than 17,757 tons) was not included, nor was electronics recycling (more than 26 tons), which would have resulted in a significant offset.
Business travel	Relevant, calculated	24629	Emissions data for air was provided by our travel vendors using DEFRA guidelines for short/long haul flights. For scope 3 emissions from auto rental, emissions data was provided by our travel vendors. Other scope 3 auto emissions were calculated based on actual miles traveled using emissions data for highway vehicles from Table 2-15 of the Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990–2012. Vehicle-miles and passenger-miles data for highway vehicles are from Table VM-1 of the Federal Highway Administration Highway Statistics 2012.		
Employee commuting	Relevant, not yet calculated				Have not determined tracking or calculation methodology.
Upstream leased assets	Relevant, calculated	69146	Emissions from leased office space is estimated using the emissions intensity per SF of the facilities owned/operated where we pay the utility bill and applying to the SF of the facilities that are not included in our Scope 1/2 reporting boundary.		
Downstream transportation and distribution	Not evaluated				
Processing of sold products	Not relevant, explanation provided				Due to the nature of our business as a financial services provider, this is not relevant.
Use of sold products	Not evaluated				
End of life treatment of sold products	Not evaluated				Due to the nature of our business as a financial services provider, there are minimal end of life disposition opportunities, with the exception of card products disposal, which would be a de minimus impact. Note: impact of paper

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using data obtained from suppliers or value chain partners	Explanation
					statement disposal has not yet been evaluated.
Downstream leased assets	Not evaluated				We lease a portion of our real estate to others. Due to the way we have estimated our scope 3 emissions for leased assets, at this time the downstream emissions are included with our upstream emissions.
Franchises	Not relevant, explanation provided				We do not operate franchises.
Investments	Not evaluated				
Other (upstream)	Not evaluated				
Other (downstream)	Not evaluated				

CC14.2

Please indicate the verification/assurance status that applies to your reported Scope 3 emissions

No third party verification or assurance

CC14.3

Are you able to compare your Scope 3 emissions for the reporting year with those for the previous year for any sources?

Yes

CC14.3a

Please identify the reasons for any change in your Scope 3 emissions and for each of them specify how your emissions compare to the previous year

Sources of Scope 3 emissions	Reason for change	Emissions value (percentage)	Direction of change	Comment
Business travel	Change in output	8.8	Decrease	Concerted effort to reduce business travel in 2014.
Waste generated in operations	Change in output	17	Increase	Due to acquisition of Charter One Bank.

CC14.4

Do you engage with any of the elements of your value chain on GHG emissions and climate change strategies? (Tick all that apply)

Yes, our suppliers
Yes, our customers

CC14.4a

Please give details of methods of engagement, your strategy for prioritizing engagements and measures of success

In the past, we have hosted sustainability summits with our key suppliers and encouraged dialogue between our suppliers as it relates to their support of our initiatives, as well as collaboration among them. In certain vendor selection processes, we may engage with suppliers in discussions about sustainability opportunities related to the goods and services being purchased. In addition, through our RFP process, customers are analyzing us in part based on our climate change strategies and environmental initiatives and we have offered to collaborate with them to help meet their needs.

CC14.4b

To give a sense of scale of this engagement, please give the number of suppliers with whom you are engaging and the proportion of your total spend that they represent

Number of suppliers	% of total spend	Comment

CC14.4c

If you have data on your suppliers' GHG emissions and climate change strategies, please explain how you make use of that data

How you make use of the data	Please give details

Further Information

Module: Sign Off

Page: CC15. Sign Off

CC15.1

Please provide the following information for the person that has signed off (approved) your CDP climate change response

Name	Job title	Corresponding job category
Gregory Thorne	VP / Sustainability & Energy Manager	Environment/Sustainability manager

Further Information

CDP: [D][-,-]