

# Welcome to your CDP Climate Change Questionnaire 2022

## C0. Introduction

### C0.1

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

Ally Financial Inc. (NYSE: ALLY) is a digital financial services company committed to its promise to “Do It Right” for its consumer, commercial and corporate customers. Ally is composed of an industry-leading independent auto finance and insurance operation, an award-winning digital direct bank (Ally Bank, Member FDIC and Equal Housing Lender, which offers mortgage lending, point-of-sale personal lending, and a variety of deposit and other banking products), a consumer credit card business, a corporate finance business for equity sponsors and middle-market companies, and securities brokerage and investment advisory services. Our brand conviction is that we are all better off with an ally, and our focus is on helping our customers achieve their strongest financial well-being, a notion personalized to what is important to them.

Our primary business lines are Dealer Financial Services, which is composed of our Automotive Finance and Insurance operations, Mortgage Finance, and Corporate Finance. Corporate and Other primarily consists of centralized corporate treasury activities, the management of our legacy mortgage portfolio, the activity related to Ally Invest, Ally Lending, and reclassifications and eliminations between the reportable operating segments. Additionally, beginning in December 2021 with the acquisition of Fair Square, which we rebranded Ally Credit Card, financial information related to our credit card business is included within Corporate and Other. Ally Bank’s assets and operating results are included within our Automotive Finance, Mortgage Finance, and Corporate Finance segments, as well as Corporate and Other, based on its underlying business activities. As of December 31, 2021, Ally Bank had total assets of \$172.8 billion, and total nonaffiliate deposits of \$141.6 billion.

Our long-term strategic objectives are centered around differentiating our company as a relentless ally for the financial well-being of our consumer, commercial, and corporate customers by (1) leveraging our “Do it Right” purpose-driven culture as we drive enhanced value for our customers, communities, employees, and stockholders, (2) growing and diversifying our leading automotive, insurance, and digital-bank platforms through increased scale and expanded product solutions, (3) driving ongoing customer growth and relationship

deepening, (4) operating under efficient, disciplined risk management and capital allocation approaches, (5) out-executing our competition and creating differentiated advantages through continuous investment and evolution among our leading experiences, products, and brand, and (6) delivering long-term value evident through sustainable financial results and stockholder returns.

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

*The information included within this submission and any related communications contain forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995. These statements can be identified by the fact that they do not relate strictly to historical or current facts. Forward-looking statements often use words such as “believe,” “expect,” “anticipate,” “intend,” “pursue,” “seek,” “continue,” “estimate,” “project,” “outlook,” “forecast,” “potential,” “target,” “objective,” “trend,” “plan,” “goal,” “initiative,” “priorities” or other words of comparable meaning or future-tense or conditional verbs such as “may,” “will,” “should,” “would” or “could.” Forward-looking statements convey our expectations, intentions or forecasts about future events, circumstances, or results. All forward-looking statements, by their nature, are subject to assumptions, risks and uncertainties, which may change over time and many of which are beyond our control. You should not rely on any forward-looking statement as a prediction or guarantee about the future. Actual future objectives, strategies, plans, prospects, performance, conditions or results may differ materially from those set forth in any forward-looking statement. Some of the factors that may cause actual results or other future events or circumstances to differ from those in forward-looking statements are described in our Annual Report on Form 10-K for the year ended December 31, 2021, our subsequent Quarterly Reports on Form 10-Q or Current Reports on Form 8-K, or other applicable documents that are filed or furnished with the U.S. Securities and Exchange Commission (collectively, our SEC filings). Any forward-looking statement made by us or on our behalf speaks only as of the date that it was made. We do not undertake to update any forward-looking statement to reflect the impact of events, circumstances or results that arise after the date that the statement was made, except as required by applicable securities laws. You, however, should consult further disclosures (including disclosures of a forward-looking nature) that we may make in any subsequent SEC filings.*

## C0.2

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

	Start date	End date	Indicate if you are providing emissions data for past reporting years
Reporting year	January 1, 2021	December 31, 2021	No

## C0.3

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

- Canada
- United States of America

## C0.4

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

USD

## C0.5

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

Operational control

## C-FS0.7

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

	Does your organization undertake this activity?	Insurance types underwritten	Industry sectors your organization lends to, invests in, and/or insures
Banking (Bank)	Yes		Electronic components manufacturing Finished wood products Metal smelting, refining & forming Personal care & household products Pharmaceuticals Supermarkets, food & drugstores
Investing (Asset manager)	Yes		
Investing (Asset owner)	Yes		Pharmaceuticals
Insurance underwriting (Insurance company)	Yes	General (non-life)	

## C0.8

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

Indicate whether you are able to provide a unique identifier for your organization	Provide your unique identifier
Yes, a Ticker symbol	ALLY

## C1. Governance

### C1.1

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

Yes

#### C1.1a

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

Position of individual(s)	Please explain
Chief Executive Officer (CEO)	The Chief Executive Officer of Ally Financial Inc. (Ally), under the direction and oversight of the Board of Directors (Board), is responsible for the business and affairs of Ally, including climate-related issues.
Board-level committee	The Compensation, Nominating, and Governance Committee assists the Board in overseeing, in coordination with other committees of the Board as appropriate, Ally's ESG strategies, initiatives, and activities, including climate-related issues. The Risk Committee assists the Board in overseeing Ally's climate-related risks commensurate with its structure, risk profile, complexity, activities, and size. The Audit Committee assists the Board in overseeing Ally's accounting and financial reporting, including in connection with any climate-related issues.

#### C1.1b

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

Frequency with which climate-related issues are a scheduled agenda item	Governance mechanisms into which climate-related issues are integrated	Scope of board-level oversight	Please explain
Scheduled – some meetings	Reviewing and guiding risk management policies	Climate-related risks and opportunities to our own operations	The Risk Committee assists the Board in overseeing Ally's climate-related risks commensurate with its structure, risk profile, complexity, activities, and size and, in doing so, coordinates with the

		<p>Climate-related risks and opportunities to our banking activities</p> <p>Climate-related risks and opportunities to our investment activities</p> <p>Climate-related risks and opportunities to our insurance underwriting activities</p>	<p>Compensation, Nominating, and Governance Committee as appropriate. The Risk Committee's oversight of climate-related risks is informed and facilitated by periodic reports from the Chief Risk Officer and the Executive Director—Environmental Sustainability Risk.</p>
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## C1.1d

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

	Board member(s) have competence on climate-related issues	Primary reason for no board-level competence on climate-related issues	Explain why your organization does not have at least one board member with competence on climate-related issues and any plans to address board-level competence in the future
Row 1	No, but we plan to address this within the next two years	Important but not an immediate priority	The Board and management regularly review all risks including those related to climate change. As Ally continues to mature our climate risk management processes and climate change mitigation strategies, ongoing education and overall understanding of the potential impacts of climate change will remain a priority.

## C1.2

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

Name of the position(s) and/or committee(s)	Reporting line	Responsibility	Coverage of responsibility	Frequency of reporting to the board on climate-related issues

Chief Executive Officer (CEO)	Reports to the board directly	Both assessing and managing climate-related risks and opportunities	Risks and opportunities related to our banking Risks and opportunities related to our investing activities Risks and opportunities related to our insurance underwriting activities Risks and opportunities related to our own operations	Quarterly
Chief Risks Officer (CRO)	CEO reporting line	Both assessing and managing climate-related risks and opportunities	Risks and opportunities related to our banking Risks and opportunities related to our investing activities Risks and opportunities related to our insurance underwriting activities Risks and opportunities related to our own operations	Quarterly
Other C-Suite Officer, please specify Chief Administrative Officer	CEO reporting line	Both assessing and managing climate-related risks and opportunities	Risks and opportunities related to our own operations	Not reported to the board

### C1.3

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

	Provide incentives for the management of climate-related issues	Comment
Row 1	No, not currently but we plan to introduce them in the next two years	

## C-FS1.4

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

	Employment-based retirement scheme that incorporates ESG criteria, including climate change	Provide reasons for not incorporating ESG criteria into your organization’s employment-based retirement scheme and your plans for the future
Row 1	No, and we do not plan to in the next two years	Ally recognizes that climate-related practices are increasingly important to the financial services industry. We have not yet requested any climate-related information directly from our long-term asset managers, but as our own sustainability requirements mature, we will consider ways to incorporate these practices into the oversight of our asset managers.

## C2. Risks and opportunities

### C2.1

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

Yes

#### C2.1a

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

	From (years)	To (years)	Comment
Short-term	0	1	Ally is currently assessing how to better integrate environmental sustainability objectives and opportunities into our strategic planning and forecasting process. How we define our time horizons may shift once this assessment is completed.
Medium-term	1	3	Ally is currently assessing how to better integrate environmental sustainability objectives and opportunities into our strategic planning and forecasting process. How we define our time horizons may shift once this assessment is completed.
Long-term	3	10	Ally is currently assessing how to better integrate environmental sustainability objectives and opportunities into our strategic planning and forecasting process. How we define our time horizons may shift once this assessment is completed.

## C2.1b

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

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

## C2.2

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

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#### **Value chain stage(s) covered**

Direct operations

#### **Risk management process**

A specific climate-related risk management process

#### **Frequency of assessment**

Annually

#### **Time horizon(s) covered**

Short-term

#### **Description of process**

In 2021, Ally distributed two annual facility best practices questionnaires, which were first introduced in 2020. These questionnaires were designed to assess Ally's current state regarding sustainability to identify opportunities. The Property Manager Questionnaire is sent to our property management partners and focuses on the operations and maintenance of the building, including energy management, green cleaning, and waste management. This questionnaire also focuses on energy, water, and waste audits, indoor air quality, and water testing. The Tenant Energy Best Practices Questionnaire targets operations within Ally's spaces, including energy management, appliances, waste management, green cleaning, and pest control.

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#### **Value chain stage(s) covered**



Direct operations

**Risk management process**

Integrated into multi-disciplinary company-wide risk management process

**Frequency of assessment**

Not defined

**Time horizon(s) covered**

Short-term

Medium-term

**Description of process**

In 2021, Ally introduced acute physical risk due to climate change into a nine-quarter scenario analysis prepared for the Capital Plan Stress Test exercise, which was concluded in 2022. The purpose was to introduce climate change risks as distinct from weather related business disruption. Ally plans to evaluate longer-term scenario analysis to further understand potential physical and transition risk impacts in the future.

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

**C2.2a**

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

	<b>Relevance &amp; inclusion</b>	<b>Please explain</b>
Current regulation	Relevant, always included	We consider current regulation in our assessment of potential climate-related risk impacts to existing products and services. In 2021, we completed a TCFD Workshop with internal stakeholders which identified climate related risks, and conducted a high-level, preliminary risk assessment, related to current regulation (e.g., Country, State, Local).
Emerging regulation	Relevant, always included	We consider emerging regulation in our assessment of potential climate-related risk impacts as they relate to additional mandates on, and regulation of, existing products and services. In 2021, we completed a TCFD Workshop with internal stakeholders which identified climate related risks, and conducted a high-level, preliminary

		risk assessment. As emerging regulations continue to develop (e.g., proposed SEC climate disclosure requirements), Ally will evaluate the potential impacts such regulatory requirements may have on our business and operational practices.
Technology	Relevant, always included	In 2021, we completed a TCFD Workshop with internal stakeholders which identified climate related risks, and conducted a high-level, preliminary risk assessment, related to technology (e.g., office heating and cooling, lighting, waste, and capital goods energy efficiency status).
Legal	Relevant, always included	We consider legal risk in our assessment of potential climate-related risk impacts. In 2021, we completed a TCFD Workshop with internal stakeholders which identified climate related risks, and conducted a high-level, preliminary risk assessment, related to legal risk (e.g., climate-related insurance claims or data centers failures that may occur due to extreme weather).
Market	Relevant, always included	We consider market risk in our assessment of potential climate-related risk impacts as it relates to shifts in consumer patterns, including customer demand for access to low carbon products and services. In 2021, we completed a TCFD Workshop with internal stakeholders which identified climate related risks, and conducted a high-level, preliminary risk assessment, related to market risk (e.g., the potential for changes in consumer loan portfolios reflecting an increase in hybrid, plug-in hybrid and electric vehicles demand, and reduced demand for internal combustion vehicles).
Reputation	Relevant, always included	We consider reputation risk in our assessment of potential climate-related risk impacts as we may be subject to any potential negative public opinion of the financial sector industry. In 2021, we completed a TCFD Workshop with internal stakeholders which identified climate related risks, and conducted a high-level, preliminary risk assessment related to reputational risk (e.g., increased stakeholder concern or negative stakeholder perceptions related to financed emissions within our portfolio. Additionally, perceptions of the adequacy of our efforts to support the transition to a low carbon economy may impact our ability to do business with corporate clients and/or suppliers who have climate risk mitigation strategies).
Acute physical	Relevant, always included	We consider acute physical climate-related risks as some of Ally's operations occur in areas that could be negatively impacted by an increase in the severity or frequency of acute physical weather events. In 2021, we completed a TCFD Workshop with internal stakeholders which identified climate related risks, and conducted a high-level, preliminary risk assessment, related to acute physical risks. For example, extreme weather events could cause short-term closure of Ally's facilities that could prevent Ally's employees from working (e.g., from the office or their homes) and/or disrupt servers/data centers.

		Additionally, as part of how Ally P&C Insurance manages climate-related physical risk, changes in frequency or severity of weather events are reflected in loss projections which allow us to properly and adequately price for insured risks.
Chronic physical	Relevant, always included	We consider chronic physical climate-related risks as some of Ally's operations occur in areas that could be negatively impacted by long-term changes in weather patterns, that including the potential for damage to essential infrastructure, automobile dealers and car manufacturers. In 2021, we completed a TCFD Workshop with internal stakeholders which identified climate related risks, and conducted a high-level preliminary risk assessment, related to chronic physical risk. For example, long-term changes in weather patterns that cause significant long-term damage to Ally's offices, servers, and data centers (e.g., impact to automobile dealer operations and the plant operations of car manufacturers in water-stressed areas).

### C-FS2.2b

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

	We assess the portfolio's exposure
Banking (Bank)	Yes
Investing (Asset manager)	Yes
Investing (Asset owner)	Yes
Insurance underwriting (Insurance company)	Yes

### C-FS2.2c

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

	Type of risk management process	Proportion of portfolio covered by risk management process	Type of assessment	Time horizon(s) covered	Tools and methods used	Provide the rationale for implementing this process to assess your portfolio's exposure to climate-related risks and opportunities

Banking (Bank)	A specific climate-related risk management process	100	Qualitative only	Short-term Medium-term Long-term	Internal tools/methods	In 2021, we completed a TCFD Workshop with internal stakeholders to identify climate related risks and conducted a high-level, preliminary risk assessment of our banking portfolio. We plan to conduct a more thorough climate related risk assessment to evaluate portfolio exposure to climate related risks and opportunities in the future.
Investing (Asset manager)	A specific climate-related risk management process	100	Qualitative only	Short-term Medium-term Long-term	Internal tools/methods	In 2021, we completed a TCFD Workshop with internal stakeholders to identify climate related risks and conducted a high-level, preliminary risk assessment of our investment portfolio as an

						asset manager. We plan to conduct a more thorough climate related risk assessment to evaluate portfolio exposure to climate related risks and opportunities in the future.
Investing (Asset owner)	A specific climate-related risk management process	100	Qualitative only	Short-term Medium-term Long-term	Internal tools/methods	In 2021, we completed a TCFD Workshop with internal stakeholders to identify climate related risks, and conducted a high-level, preliminary risk assessment of our investment portfolio as an asset owner. We plan to conduct a more thorough climate related risk assessment to evaluate portfolio exposure to climate related risks and opportunities in the future.

Insurance underwriting (Insurance company)	A specific climate-related risk management process	100	Qualitative only	Short-term Medium-term Long-term	Internal tools/methods	In 2021, we completed a TCFD Workshop with internal stakeholders to identify climate related risks, and conducted a high-level, preliminary risk assessment of our insurance portfolio as an underwriter. Additionally, as part of how Ally P&C Insurance manages climate related physical risk, we assess our portfolio's exposure to weather losses, which includes weather losses resulting from changes in climate over time. Ally Insurance complies with the State of California Climate Risk Initiative (2015) that contains restrictions on investments
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						related to thermal coal enterprises.
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## C-FS2.2d

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

	We consider climate-related information	Explain why you do not consider climate-related information and your plans to address this in the future
Banking (Bank)	No, but we plan to do so in the next two years	Ally recognizes that climate change-related risk assessment practices are increasingly important to the financial services industry. We have not yet requested any climate-related information from our clients as part of our due diligence efforts but intend to do so within the next two years, consistent with industry standards and aligned with the broader set of TCFD recommendations. As Ally's Enterprise Sustainability Strategy matures, each relevant Business Line, will implement these efforts in a way that's consistent with their business model and risk assessment practices, in coordination with the Sustainability Office to confirm alignment with the overarching enterprise strategy.
Investing (Asset manager)	Yes	
Investing (Asset owner)	No, but we plan to do so in the next two years	Ally recognizes that climate change-related risk assessment practices are increasingly important to the financial services industry. We have not yet requested any climate-related information from our clients as part of our due diligence efforts but intend to do so within the next two years, consistent with industry standards and aligned with the broader set of TCFD recommendations. As Ally's Enterprise Sustainability Strategy matures, each relevant Business Line, will implement these efforts in a way that's consistent with their business model and risk assessment practices, in coordination with the Sustainability Office to confirm alignment with the overarching enterprise strategy.
Insurance underwriting (Insurance company)	No, but we plan to do so in the next two years	Ally recognizes that climate change-related risk assessment practices are increasingly important to the financial services industry. We have not yet requested any climate-related information from our clients as part of our due diligence efforts but intend to do so within the next two years, consistent with industry standards and aligned with the broader set of TCFD recommendations. As Ally's Enterprise Sustainability Strategy

		<p>matures, each relevant Business Line, will implement these efforts in a way that's consistent with their business model and risk assessment practices, in coordination with the Sustainability Office to confirm alignment with the overarching enterprise strategy.</p>
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## C-FS2.2e

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

### Portfolio

Investing (asset manager)

### Type of climate-related information considered

Other, please specify

Socially Responsible Investment preference and risk tolerance

### Process through which information is obtained

Directly from the client/investee

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

Other, please specify

Mix of several sectors

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

As a part of Ally Invest Advisors' risk tolerance questionnaire and onboarding for a Robo Portfolio, prospective clients are asked if Socially Responsible Investments align with how they prefer to invest. If they choose this option, Ally Invest Advisors recommends an ESG portfolio that includes ESG related ETFs, which use the MSCI Focus Benchmark.

## 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?**

No

## C2.3b

**(C2.3b) Why do you not consider your organization to be exposed to climate-related risks with the potential to have a substantive financial or strategic impact on your business?**



	Primary reason	Please explain
Row 1	Evaluation in process	<p>Ally worked with a consultancy firm to conduct a high level TCFD workshop that identified physical and transition risks and potential future impacts as well as opportunities for our business in connection to policies and market changes linked to the transition to a low-carbon economy. The assessment was conducted to identify potential future climate-related impacts, risks and opportunities so that we can perform a qualitative scenario analysis in the future. This preliminary assessment identified several physical risks and opportunities relevant to our business.</p> <p>In 2021, Ally introduced acute physical risk due to climate change into a nine-quarter scenario analysis prepared for the Capital Plan Stress Test exercise, which was concluded in 2022. The purpose was to introduce climate change risks as distinct from weather related business disruption. Ally plans to evaluate longer-term scenario analysis to further understand potential physical and transition risk impacts in the future.</p> <p>As part of how Ally P&amp;C Insurance manages climate related physical risk, we assess our portfolio's exposure to weather losses, which includes weather losses resulting from changes in climate over time. Ally Insurance complies with the State of California Climate Risk Initiative (2015) that contains restrictions on investments related to thermal coal enterprises.</p>

## 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?**

No

## C2.4b

**(C2.4b) Why do you not consider your organization to have climate-related opportunities?**

	Primary reason	Please explain
Row 1	Evaluation in progress	<p>Ally worked with a consultancy firm to conduct a high level TCFD workshop that identified physical and transition risks and potential future impacts as well as opportunities for our business in connection to policies and market changes linked to the transition to a low-carbon economy. The assessment was conducted to identify potential future climate-related impacts, risks and opportunities so that we can perform a qualitative scenario analysis in the future. This preliminary assessment resulted in the identification of several physical risks and opportunities relevant to our business.</p> <p>In 2021, Ally developed an ideation session strategy to be implemented in 2022</p>

	that enables each business line to identify potential climate-related opportunities relevant to each operating model and product suite.
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## C3. Business Strategy

### C3.1

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

Row 1

#### Transition plan

No, our strategy has been influenced by climate-related risks and opportunities, but we do not plan to develop a transition plan within two years

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

We are currently working on identifying opportunities for Ally to facilitate the transition to a low carbon economy. In the upcoming years we intend to develop a low-carbon transition plan; however, at this time we are not able to forecast when the plan will be complete for publication.

### C3.2

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

	Use of climate-related scenario analysis to inform strategy	Primary reason why your organization does not use climate-related scenario analysis to inform its strategy	Explain why your organization does not use climate-related scenario analysis to inform its strategy and any plans to use it in the future
Row 1	No, but we anticipate using qualitative and/or quantitative analysis in the next two years	Important but not an immediate priority	Ally worked with a consultancy firm to conduct a high level TCFD workshop that identified physical and transition risks and potential future impacts as well as opportunities for our business in connection to policies and market changes linked to the transition to a low-carbon economy. The assessment was conducted to identify potential future climate-related impacts, risks and opportunities so that we can perform a qualitative scenario analysis in the future. This preliminary assessment resulted in the identification of several physical risks and

			<p>opportunities relevant to our business. For example, we found the likelihood of extreme weather events may impact multiple business lines. Extreme weather events that cause short-term closure of Ally's facilities would prevent Ally's employees from working and/or disrupt servers/data centers. Results from this assessment also identified strategic opportunities for our business such as new products and services development. The conclusions from our TCFD workshop informed our progress on a qualitative climate event analysis that considered the physical risk of increasingly frequent and more intense natural disasters as a result of climate change. We intend to expand on this analysis over the next two years to incorporate additional climate-related risks over different time horizons as part of a qualitative scenario analysis.</p>
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### C3.3

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

	Have climate-related risks and opportunities influenced your strategy in this area?	Description of influence
Products and services	Yes	Climate-related risks and opportunities have influenced our strategy for our products and services as it relates to customer demand for products and services with lower emissions options. In 2021, Ally conducted a high-level TCFD analysis and assessed the opportunities in response to such demands within business units. To meet increasing shifts in consumer patterns for lower emissions products and services for electric vehicles, Ally plans to introduce insurance related products that align to the needs of consumers who own hybrids and EVs. Additionally, the climate-related risks identified in our high-level TCFD analysis have influenced our strategy to develop investment fund offerings that deliver lower carbon intensity and have relevant climate conscious product labelling for Ally Invest customers.

Supply chain and/or value chain	Evaluation in progress	Ally is continuing to expand its risk assessment processes and climate related data gathering with the goal of aligning its climate risk evaluation and reporting with recommendations of the TCFD and evolving industry standards. In 2021, we performed a scope 3 emissions screening to identify significant value chain climate-related activities. Additionally, we began internal discussions around the development of a comprehensive sustainability strategy with respect to our value chain. Our goal is to enable the collection of data related to third party greenhouse gas emissions and overall intentions related to environmental sustainability. We plan to continue this initiative in 2022 which will help us further integrate supplier risks and opportunities into our strategy.
Investment in R&D	No	As a financial services organization Ally has minimal R&D operations, therefore this business area is not applicable.
Operations	Yes	<p>Climate-related risks and opportunities have influenced our operational strategy, including risks associated with increased extreme weather events that could disrupt Ally business operations and employee productivity. In 2021, Ally conducted a high-level TCFD analysis and assessed the opportunities to respond to such risks within business units. We have identified opportunities to minimize these risks by pursuing energy efficiency measures, identification of efficiencies and cost reductions while working with third parties on climate-related subjects, and other strategies to minimize risk. Additionally, we established a sustainability office to build out and create a holistic enterprise sustainability strategy.</p> <p>Ally developed a leasing strategy to occupy LEED certified buildings where possible and weighing this certification more when comparing buildings. In December 2021 we created our Sustainable Design and Construction Guidelines that help guide sustainability decisions when designing and constructing Ally sites and enhance occupant wellbeing.</p>

### C3.4

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

Financial planning elements that	Description of influence
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	have been influenced	
Row 1	Revenues Liabilities Claims reserves	<p>Revenues: Climate-related risks and opportunities continue to be considered in our financial planning process for revenues as a result of evaluating shifting consumer patterns towards hybrid, plug-in hybrid and electric vehicles.</p> <p>Liabilities/Claims reserves: How governments act to mitigate climate and related environmental risks, as well as associated changes in the behavior and preferences of businesses and consumers, could have an adverse effect on our business and financial results including liabilities and claims reserves. We may be compelled to change or cease some of our lending or other business practices or our operational processes because of climate- or environmental-driven changes in applicable law or supervisory expectations or due to related political, social, market, or similar pressure. It is possible as well that changes in climate and related environmental risks, perceptions of them, and governmental responses to them may occur more rapidly than we are able to adapt without disrupting our business and impairing our financial results.</p>

### C-FS3.6

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

No, but we plan to include climate-related requirements and/or exclusion policies in our policy framework in the next two years

### C-FS3.6c

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

In 2021, Ally evaluated the recommendations from the Task Force on Climate-related Financial Disclosures to identify climate-related risks and opportunities relevant to our business to inform our strategy which we will ultimately incorporate into the policy framework of our organization. Within the next two years we anticipate being in a position to assess inclusion of climate-related requirements and/or exclusion policies into our policy framework.

### C-FS3.7

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

Climate-related requirements included in selection process and	Primary reason for not including climate-related requirements in selection process and	Explain why climate-related requirements are not included in selection process and engagement with

	engagement with external asset managers	engagement with external asset managers	external asset managers and your plans for the future
Row 1	No, and we do not plan to include climate-related requirements in the next two years	Important but not an immediate priority	Ally recognizes that climate-related practices are increasingly important to the financial services industry. We have not yet requested any climate-related information directly from our long-term asset managers, but as our own sustainability requirements mature, we will consider ways to incorporate these practices into the oversight of our asset managers.

### C-FS3.8

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

	Climate-related covenants in financing agreements	Primary reason for not including climate-related covenants in financing agreements	Explain why your organization does not include climate-related covenants in financing agreements and your plans for the future
Row 1	No, and we do not plan to include climate-related covenants in the next two years	Important but not an immediate priority	As Ally's own climate-related policies mature, we will evaluate our ability to incorporate covenants into our financing agreements in the future.

## C4. Targets and performance

### C4.1

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

No target

### C4.1c

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

	Primary reason	Five-year forecast	Please explain
Row 1	We are planning to introduce a target in the	As a digital bank with no brick-and-mortar branches, Ally inherently has a lower carbon footprint and reduced environmental impact than traditional	In 2020, Ally made the decision to accelerate our current environmental efforts beyond our facilities and work to develop a comprehensive strategy that

	<p>next two years</p>	<p>branch based financial institutions. As we begin to better understand the impact of our direct and indirect operational activities, we will pursue setting an emissions target with a projected reduction in emissions, consistent with Paris Agreement targets to keep average global temperature increases below 1.5 degrees Celsius over pre-industrial levels.</p>	<p>strengthens the link between our social and environmental initiatives. We began gathering data to assess our Scope 1, Scope 2, and Scope 3 emissions in 2020. Our 2021 emissions calculations provide additional insight into the variances over 2020, opportunities for improving data collection and mapping and the impact of business strategy decisions on overall emissions. We plan to incorporate this quantitative information into our climate strategy, which can aid in setting an emissions target and predictive forecasting of emissions over a five-year cycle.</p>
--	-----------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

## C4.2

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

Target(s) to increase low-carbon energy consumption or production

Other climate-related target(s)

## C4.2a

**(C4.2a) Provide details of your target(s) to increase low-carbon energy consumption or production.**

.....

**Target reference number**

Low 1

**Year target was set**

2021

**Target coverage**

Company-wide

**Target type: energy carrier**

Electricity

**Target type: activity**

Consumption

**Target type: energy source**

Renewable energy source(s) only

**Base year**

2020

**Consumption or production of selected energy carrier in base year (MWh)**

18,292

**% share of low-carbon or renewable energy in base year**

100

**Target year**

2021

**% share of low-carbon or renewable energy in target year**

100

**% share of low-carbon or renewable energy in reporting year**

100

**% of target achieved relative to base year [auto-calculated]**

**Target status in reporting year**

Achieved

**Is this target part of an emissions target?**

No

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

No, it's not part of an overarching initiative

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

**Plan for achieving target, and progress made to the end of the reporting year**

**List the actions which contributed most to achieving this target**

Ally engaged Natural Capital Partners to purchase Green-e Energy Certified renewable energy credits (RECs) to neutralize Scope 2 emissions.

## C4.2b

**(C4.2b) Provide details of any other climate-related targets, including methane reduction targets.**

---

**Target reference number**

Oth 1

**Year target was set**

2017



**Target coverage**

Company-wide

**Target type: absolute or intensity**

Intensity

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

Low-carbon buildings

Percentage of buildings with a green building certificate

**Target denominator (intensity targets only)**

square foot

**Base year**

2017

**Figure or percentage in base year**

20.5

**Target year**

2023

**Figure or percentage in target year**

30

**Figure or percentage in reporting year**

29

**% of target achieved relative to base year [auto-calculated]**

89.4736842105

**Target status in reporting year**

Underway

**Is this target part of an emissions target?**

No, it is not part of an emissions target.

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

No, it's not part of an overarching initiative

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

In 2021, we made significant progress toward our goal to have more than 30% of the Ally portfolio in LEED certified buildings by 2023. The opening of the Ally Charlotte Center, along with other facilities and updates in our other locations, fueled our progress — reaching 29% by the end of 2021. We look forward to meeting this goal in 2022. Incorporation of sustainability criteria into our construction process is a critical component of our commitment to reduce our impact on the environment.

**Plan for achieving target, and progress made to the end of the reporting year**

As we move forward, all construction projects will utilize the Design and Construction Guidelines developed by Ally in 2021, which is our reference tool for high efficiency standards and sustainable product procurement opportunities aimed to reduce excess consumption and enhance occupant well-being. The Design and Construction Guidelines will serve as a foundational baseline for incorporating industry best practice standards for sustainable buildings and starting point for third-party green building certifications.

**List the actions which contributed most to achieving this target**

## C4.3

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

No

## C4.3d

**(C4.3d) Why did you not have any emissions reduction initiatives active during the reporting year?**

As 2022 is Ally's second emissions submission year, for our 2021 emissions, we have not had the opportunity to assess the results of our inventory and identify opportunities for emissions-reduction initiatives. As our reporting process becomes more robust, we plan to identify emissions-reduction activities through the framework of our climate strategy within two years. Ally understands the importance of our participation in these activities and is working towards that goal.

## C-FS4.5

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

No

## C5. Emissions methodology

### C5.1

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

No

## C5.1a

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

### Row 1

**Has there been a structural change?**

Yes, an acquisition

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

Fair Square Financial

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

The integration of Fair Square Financial is still in progress. Once the process is complete, we plan to assess 2020 emissions of Fair Square Financial (Ally's emission base year). As part of Ally's inventory management program, we have determined a significance threshold that is in line with the guidance provided within the Greenhouse Gas Protocol. If this threshold is met, our action will be based upon data availability. If Fair Square Financial is able to provide the necessary data, we will update our base year with the additional emissions. If 2020 information is unavailable, we will recalculate our base year emissions with the most recent year of a complete data set.

## C5.1b

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

Change(s) in methodology, boundary, and/or reporting year definition?	
Row 1	No

## C5.1c

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

	Base year recalculation	Base year emissions recalculation policy, including significance threshold
Row 1	No, because we have not evaluated whether the changes should trigger a base year recalculation	As part of Ally's inventory management program, we have determined a significance threshold that is in line with the guidance provided within the Greenhouse Gas Protocol. If this threshold is met, our action will be based upon data availability. If Fair Square Financial is able to provide the necessary data, we will update our base year with the additional emissions. If 2020 information is unavailable, we will recalculate our base year emissions with the most recent year of a complete data set.

## C5.2

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

#### Scope 1

---

**Base year start**

January 1, 2020

**Base year end**

December 31, 2020

**Base year emissions (metric tons CO<sub>2</sub>e)**

4,375

**Comment**

Prior to the 2020 reporting year deadline for CDP submissions. Ally had not finalized partnership selection for the purchase of carbon offsets. After finalizing our inaugural greenhouse gas emissions calculation and CDP response, to achieve carbon neutrality, Ally worked with the Arbor Day Foundation to offset its Scope 1 greenhouse gas emissions with high-quality, U.S.-based carbon offsets that address both afforestation and reforestation, particularly in the lower Mississippi River Valley, one of the most important critical wetland resources in North America.

#### Scope 2 (location-based)

---

**Base year start**

January 1, 2020

**Base year end**

December 31, 2020

**Base year emissions (metric tons CO<sub>2</sub>e)**

7,822

**Comment**

#### Scope 2 (market-based)

---

**Base year start**

January 1, 2020

**Base year end**

December 31, 2020

**Base year emissions (metric tons CO<sub>2</sub>e)**

0

**Comment**

Prior to the 2020 reporting year deadline for CDP submissions. Ally had not finalized partnership selection for the purchase of renewable energy credits. After finalizing our inaugural greenhouse gas emissions calculation and CDP response, to achieve carbon neutrality, Ally engaged Natural Capital Partners to purchase Green-e Energy Certified renewable energy credits (RECs) to neutralize Scope 2 emissions.

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

---

**Base year start**

January 1, 2020

**Base year end**

December 31, 2020

**Base year emissions (metric tons CO<sub>2</sub>e)**

195,082

**Comment**

### **Scope 3 category 2: Capital goods**

---

**Base year start**

January 1, 2020

**Base year end**

December 31, 2020

**Base year emissions (metric tons CO<sub>2</sub>e)**

27,694

**Comment**

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

---

**Base year start**

**Base year end**

**Base year emissions (metric tons CO<sub>2</sub>e)**

**Comment**

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

---

**Base year start**

**Base year end**

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

**Comment**

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

---

**Base year start**

**Base year end**

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

**Comment**

**Scope 3 category 6: Business travel**

---

**Base year start**

January 1, 2020

**Base year end**

December 31, 2020

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

1,824

**Comment**

**Scope 3 category 7: Employee commuting**

---

**Base year start**

**Base year end**

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

**Comment**

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

---

**Base year start**

**Base year end**

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

**Comment**

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

---

**Base year start**

**Base year end**

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

**Comment**

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

---

**Base year start**

**Base year end**

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

**Comment**

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

---

**Base year start**

**Base year end**

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

**Comment**

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

---

**Base year start**

**Base year end**

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

**Comment**

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

---

**Base year start**

**Base year end**

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

**Comment**

**Scope 3 category 14: Franchises**

---

**Base year start**

**Base year end**

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

**Comment**

**Scope 3 category 15: Investments**

---

**Base year start**



**Base year end**

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

**Comment**

**Scope 3: Other (upstream)**

---

**Base year start**

**Base year end**

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

**Comment**

**Scope 3: Other (downstream)**

---

**Base year start**

**Base year end**

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

**Comment**

## **C5.3**

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

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

The Greenhouse Gas Protocol: Scope 2 Guidance

US EPA Emissions & Generation Resource Integrated Database (eGRID)

Other, please specify

The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Accounting and Reporting Standard

## C6. Emissions data

### C6.1

(C6.1) What were your organization's gross global Scope 1 emissions in metric tons CO<sub>2</sub>e?

Reporting year

---

**Gross global Scope 1 emissions (metric tons CO<sub>2</sub>e)**

4,228

**Comment**

### C6.2

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

Row 1

---

**Scope 2, location-based**

We are reporting a Scope 2, location-based figure

**Scope 2, market-based**

We are reporting a Scope 2, market-based figure

**Comment**

To achieve carbon neutrality, Ally engaged Natural Capital Partners to purchase Green-e Energy Certified renewable energy credits (RECs) to neutralize Scope 2 emissions.

### C6.3

(C6.3) What were your organization's gross global Scope 2 emissions in metric tons CO<sub>2</sub>e?

Reporting year

---

**Scope 2, location-based**

9,758

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

0

**Comment**

## C6.4

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

Yes

### C6.4a

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

---

**Source**

Ally employs a subset of remote employees located in Canada that utilize company vehicles.

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

Emissions are not relevant

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

No emissions excluded

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

No emissions excluded

**Explain why this source is excluded**

As these vehicles account for three percent of Ally's leased vehicle fleet, this source has been determined to be not relevant. Ally will continue to monitor this source for material changes and consider inclusion into Scope 1 emissions.

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

1

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

Ally applied the US average emissions per vehicle to the Canadian leased vehicle fleet.

## C6.5

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

**Purchased goods and services**

---

**Evaluation status**

Relevant, calculated

**Emissions in reporting year (metric tons CO<sub>2</sub>e)**

177,966

**Emissions calculation methodology**

Spend-based method

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

0

**Please explain**

Ally assessed our procurement spend on purchased goods and services. We categorized all spend by NAICS industry sectors and utilized the US EPA EEIO Supply Chain Greenhouse Gas Emission Factors for US Industries and Commodities to calculate the associated emissions from these purchases.

**Capital goods**

---

**Evaluation status**

Relevant, calculated

**Emissions in reporting year (metric tons CO<sub>2</sub>e)**

28,680

**Emissions calculation methodology**

Spend-based method

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

0

**Please explain**

Ally assessed our procurement spend on purchased goods and services. We categorized all spend by NAICS industry sectors and utilized the US EPA EEIO Supply Chain Greenhouse Gas Emission Factors for US Industries and Commodities to calculate the associated emissions from these purchases.

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

---

**Evaluation status**

Not relevant, explanation provided

**Please explain**

Because of the nature of our operations as a financial services company, fuel and energy related activities are not a material portion of our Scope 3 emissions.

Ally Financial performed a portfolio-level screening in 2021 to identify which Scope 3 activities throughout the value chain were relevant and material. We used the World Resources Institute (WRI) Scope 3 Evaluator tool to quantitatively estimate Ally's Scope 3 GHG emissions footprint. The results of this screening estimated the size of Scope 3

indirect fuel-and-energy-related activities to be less than our inventory threshold; therefore, this category is not relevant.

There have been no material updates to our business that would indicate the need to perform the screening again.

## Upstream transportation and distribution

---

### Evaluation status

Not relevant, explanation provided

### Please explain

Since Ally is a digital financial services company, upstream transportation and distribution is not a material portion of our scope 3 emissions.

Ally Financial performed a portfolio-level screening in 2021 to identify which Scope 3 activities throughout the value chain were relevant and material. We used the World Resources Institute (WRI) Scope 3 Evaluator tool to quantitatively estimate Ally's Scope 3 GHG emissions footprint. The results of this screening estimated the size of Scope 3 upstream transportation and distribution to be less than our inventory threshold; therefore, this category is not relevant.

There have been no material updates to our business that would indicate the need to perform the screening again.

## Waste generated in operations

---

### Evaluation status

Not relevant, explanation provided

### Please explain

Since Ally is a financial services company with no physical brick and mortar storefronts, waste generated in operations is not a material portion of our scope 3 emissions.

Ally Financial performed a portfolio-level screening in 2021 to identify which Scope 3 activities throughout the value chain were relevant and material. We used the World Resources Institute (WRI) Scope 3 Evaluator tool to quantitatively estimate Ally's Scope 3 GHG emissions footprint. The results of this screening estimated the size of Scope 3 waste generated in operations to be less than our inventory threshold; therefore, this category is not relevant.

There have been no material updates to our business that would indicate the need to perform the screening again.

## Business travel

---

### Evaluation status

Relevant, calculated

**Emissions in reporting year (metric tons CO<sub>2</sub>e)**

2,438

**Emissions calculation methodology**

Spend-based method

Fuel-based method

Distance-based method

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

99

**Please explain**

Ally assessed our business travel in the modes of flights (short, medium and long haul), rail, rental cars, rideshare/taxis, and hotel stays from data provided by travel vendors. We utilized the EPA eGRID Emissions Hub to calculate the associated emissions from these trips with the distance method and the Cornell Center for Hospitality Research (CHR) Benchmarking Index and associated methodology to calculate our hotel footprint.

As data quality improved in our 2021 calculation, we have included private jet travel in this category for FY 2021 (it was included in Purchased goods and services (category 1) in our FY 2020 calculation)

**Employee commuting**

---

**Evaluation status**

Not relevant, explanation provided

**Please explain**

Employee commuting is not a material portion of our Scope 3 emissions.

Ally Financial performed a portfolio-level screening in 2021 to identify which Scope 3 activities throughout the value chain were relevant and material. We used the World Resources Institute (WRI) Scope 3 Evaluator tool to quantitatively estimate Ally's Scope 3 GHG emissions footprint. The results of this screening estimated the size of Scope 3 employee commuting to be less than our inventory threshold; therefore, this category is not relevant.

The screening was performed with 2019 assumptions for employee commuting, therefore it is determined that the screening does not need to be calculated again.

**Upstream leased assets**

---

**Evaluation status**

Not relevant, explanation provided

**Please explain**

Due to our organizational boundary definition for operational control under Scopes 1 and 2, upstream leased assets are incorporated in our Scopes 1 and 2 emissions inventory. Therefore, this category is not relevant.

**Downstream transportation and distribution**

---

**Evaluation status**

Not relevant, explanation provided

**Please explain**

Since Ally is a digital financial services company, downstream transportation and distribution is not a material portion of our scope 3 emissions.

Ally Financial performed a portfolio-level screening in 2021 to identify which Scope 3 activities throughout the value chain were relevant and material. We used the World Resources Institute (WRI) Scope 3 Evaluator tool to quantitatively estimate Ally's Scope 3 GHG emissions footprint. The results of this screening estimated the size of Scope 3 downstream transportation and distribution to be less than our inventory threshold; therefore, this category is not relevant.

There have been no material updates to our business that would indicate the need to perform the screening again.

**Processing of sold products**

---

**Evaluation status**

Not relevant, explanation provided

**Please explain**

As a financial services company, Ally Financial does not produce physical products that require processing. Therefore, this category is not relevant to our Scope 3 emissions

**Use of sold products**

---

**Evaluation status**

Not relevant, explanation provided

**Please explain**

As a financial services company, Ally Financial does not produce physical products that are used.

Ally Financial is continuing to assess industry recommendations for calculating emissions from use of sold insurance products.

**End of life treatment of sold products**

---

**Evaluation status**

Not relevant, explanation provided

**Please explain**

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

#### **Downstream leased assets**

---

##### **Evaluation status**

Not relevant, explanation provided

##### **Please explain**

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

#### **Franchises**

---

##### **Evaluation status**

Not relevant, explanation provided

##### **Please explain**

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

#### **Other (upstream)**

---

##### **Evaluation status**

##### **Please explain**

#### **Other (downstream)**

---

##### **Evaluation status**

##### **Please explain**

## **C6.10**

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

---

##### **Intensity figure**

0.0000016687

**Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO<sub>2</sub>e)**



13,985

**Metric denominator**

unit total revenue

**Metric denominator: Unit total**

8,381,000,000

**Scope 2 figure used**

Location-based

**% change from previous year**

8.33

**Direction of change**

Decreased

**Reason for change**

In an effort to consolidate several facilities into one LEED certified facility, Ally temporarily maintained control of the new and legacy facilities increasing energy usage during this transition. This was offset by increased revenue from company growth.

---

**Intensity figure**

0.0000005045

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

4,228

**Metric denominator**

unit total revenue

**Metric denominator: Unit total**

8,381,000,000

**Scope 2 figure used**

Market-based

**% change from previous year**

22.74

**Direction of change**

Decreased

**Reason for change**

A decrease in scope 1 stationary fuel combustion activity offset slightly by additional miles driven on Ally owned US vehicle fleet.

**Intensity figure**

1.33

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

13,985

**Metric denominator**

full time equivalent (FTE) employee

**Metric denominator: Unit total**

10,500

**Scope 2 figure used**

Location-based

**% change from previous year**

3.74

**Direction of change**

Increased

**Reason for change**

A decrease in scope 1 stationary fuel combustion activity offset slightly by additional miles driven on Ally owned US vehicle fleet.

## C7. Emissions breakdowns

### C7.9

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

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.**

	Change in emissions (metric tons CO2e)	Direction of change	Emissions value (percentage)	Please explain calculation
Change in renewable energy consumption	0	No change	0	Ally purchased 100% renewable energy to neutralize energy usage in 2020 and

				2021. Therefore, we calculate a 0% change.
Other emissions reduction activities	147	Decreased	3.4	<p>A decrease in scope 1 stationary fuel combustion activity offset slightly by additional miles driven on Ally owned US vehicle fleet.</p> <p>Scope 1 2020 emissions of 4,375 mtCO<sub>2</sub>e, 2021 emissions of 4,228 mtCO<sub>2</sub>e. Y/Y change of (147). <math>147/4,375 = (3.4\%)</math></p>
Divestment				
Acquisitions				
Mergers				
Change in output				
Change in methodology				
Change in boundary				
Change in physical operating conditions				
Unidentified				
Other				

## C7.9b

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

Market-based

## C8. Energy

### C8.1

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

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

## C8.2

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

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

## C8.2a

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

	Heating value	MWh from renewable sources	MWh from non-renewable sources	Total (renewable and non-renewable) MWh
Consumption of fuel (excluding feedstock)	HHV (higher heating value)	0	14,917	14,917
Consumption of purchased or acquired electricity		27,295	0	27,295
Total energy consumption		27,295	14,917	42,212

## C8.2g

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

.....  
**Country/area**

United States of America

**Consumption of electricity (MWh)**

27,295

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

0

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

27,295

## C9. Additional metrics

### C9.1

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

## C10. Verification

### C10.1

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

	Verification/assurance status
Scope 1	No third-party verification or assurance
Scope 2 (location-based or market-based)	No third-party verification or assurance
Scope 3	No third-party verification or assurance

### C10.2

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

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

## C11. Carbon pricing

### C11.2

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

Yes

## C11.2a

**(C11.2a) Provide details of the project-based carbon credits originated or purchased by your organization in the reporting period.**

---

### **Credit origination or credit purchase**

Credit purchase

### **Project type**

Forests

### **Project identification**

Verified forestry carbon credits from the Green Trees Reforestation Project –ACR114.

### **Verified to which standard**

ACR (American Carbon Registry)

### **Number of credits (metric tonnes CO<sub>2</sub>e)**

4,228

### **Number of credits (metric tonnes CO<sub>2</sub>e): Risk adjusted volume**

4,228

### **Credits cancelled**

Not relevant

### **Purpose, e.g. compliance**

Voluntary Offsetting

## C11.3

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

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

## C12. Engagement

### C12.1

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

Yes, our customers/clients

### C-FS12.1b

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

**Type of clients**

Clients of Asset Managers (Asset owners)

**Type of engagement**

Information collection (understanding client behavior)

**Details of engagement**

Other, please specify  
Onboarding questionnaire

**% client-related Scope 3 emissions as reported in C-FS14.1a**

**Portfolio coverage (total or outstanding)**

100

**Rationale for the coverage of your engagement**

Non-targeted engagement

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

As a part of Ally Invest Advisors' risk tolerance questionnaire and onboarding for its Robo Portfolio product, prospective clients are asked if socially responsible investments align with how they prefer to invest. If they choose this option, Ally Invest Advisors recommends an ESG portfolio that includes ESG related ETFs, which use the MSCI Focus Benchmark.

## C-FS12.2

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

	<b>Exercise voting rights as a shareholder on climate-related issues</b>	<b>Primary reason for not exercising voting rights as a shareholder on climate-related issues</b>	<b>Explain why you do not exercise voting rights on climate-related issues</b>
Row 1	No, and we do not plan to in the next two years	Important but not an immediate priority	

## C12.3

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

Row 1

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

Yes, we engage indirectly through trade associations

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

No, and we do not plan to have one in the next two years

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

Ally is a participant in various industry forums that are engaging with regulators and other key policy makers to help inform ongoing policy considerations specific to a changing climate, including the RMA Climate Risk Consortium, the American Bankers Association Climate Task Force and the Bank Policy Institute Climate Working Group. Ally's participation in these organizations provides the opportunity to influence and develop a consistent taxonomy, framework and standards which will support well informed and relevant policy and regulatory proposals.

## C12.3b

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

---

**Trade association**

Other, please specify

American Bankers Association (ABA)

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

Consistent

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

We are not attempting to influence their position

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

Ally is a participant in various industry forums that are engaging with regulators and other key policy makers to help inform ongoing policy considerations specific to a changing climate. Ally's participation in these organizations provides the opportunity to influence and develop consistent taxonomy, framework and standards which will support well informed and relevant policy and regulatory proposals.

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



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

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

No, we have not evaluated

---

**Trade association**

Other, please specify

The Bank Policy Institute (BPI)

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

Consistent

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

We are not attempting to influence their position

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

Ally is a participant in various industry forums that are engaging with regulators and other key policy makers to help inform ongoing policy considerations specific to a changing climate. Ally's participation in these organizations provides the opportunity to influence and develop a consistent taxonomy, framework and standards which will support well informed and relevant policy and regulatory proposals.

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

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

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

No, we have not evaluated

---

**Trade association**

Other, please specify

Risk Management Association (RMA)

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

Consistent

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

We are not attempting to influence their position

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

Ally is a participant in various industry forums that are engaging with regulators and other key policy makers to help inform ongoing policy considerations specific to a changing climate. Ally's participation in these organizations provides the opportunity to influence and develop a consistent taxonomy, framework and standards which will support well informed and relevant policy and regulatory proposals.

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

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

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

No, we have not evaluated

## C12.4

**(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).**

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**Publication**

In voluntary sustainability report

**Status**

Complete

**Attach the document**

 ally-corporate-social-responsibility-report-2021.pdf

**Page/Section reference**

**Content elements**

Strategy

Other metrics

**Comment**

**C-FS12.5**

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

	<b>Environmental collaborative framework, initiative and/or commitment</b>
Row 1	We are not a signatory/member of any collaborative framework, initiative and/or commitment related to environmental issues

**C14. Portfolio Impact**

**C-FS14.0**

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

**Lending to all carbon-related assets**

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

No, and we do not plan to assess our portfolio's exposure in the next two years

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

Important, but not immediate priority

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

At this time, we have not had the opportunity to assess the portfolio's exposure to carbon-related assets. Ally understands the importance of our participation in these activities. We will continue to look for data-driven solutions to measuring carbon-related assets and evolve our reporting and analysis accordingly.

**Lending to coal**

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

No, and we do not plan to assess our portfolio's exposure in the next two years

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

Important, but not immediate priority

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

At this time, we have not had the opportunity to assess the portfolio's exposure to carbon-related assets. Ally understands the importance of our participation in these

activities. We will continue to look for data-driven solutions to measuring carbon-related assets and evolve our reporting and analysis accordingly.

### **Lending to oil and gas**

---

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

No, and we do not plan to assess our portfolio's exposure in the next two years

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

Important, but not immediate priority

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

At this time, we have not had the opportunity to assess the portfolio's exposure to carbon-related assets. Ally understands the importance of our participation in these activities. We will continue to look for data-driven solutions to measuring carbon-related assets and evolve our reporting and analysis accordingly.

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

---

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

No, and we do not plan to assess our portfolio's exposure in the next two years

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

Important, but not immediate priority

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

At this time, we have not had the opportunity to assess the portfolio's exposure to carbon-related assets. Ally understands the importance of our participation in these activities. We will continue to look for data-driven solutions to measuring carbon-related assets and evolve our reporting and analysis accordingly.

### **Investing in coal (Asset manager)**

---

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

No, and we do not plan to assess our portfolio's exposure in the next two years

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

Important, but not immediate priority

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

At this time, we have not had the opportunity to assess the portfolio's exposure to carbon-related assets. Ally understands the importance of our participation in these

activities. We will continue to look for data-driven solutions to measuring carbon-related assets and evolve our reporting and analysis accordingly.

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

---

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

No, and we do not plan to assess our portfolio's exposure in the next two years

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

Important, but not immediate priority

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

At this time, we have not had the opportunity to assess the portfolio's exposure to carbon-related assets. Ally understands the importance of our participation in these activities. We will continue to look for data-driven solutions to measuring carbon-related assets and evolve our reporting and analysis accordingly.

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

---

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

No, and we do not plan to assess our portfolio's exposure in the next two years

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

Important, but not immediate priority

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

At this time, we have not had the opportunity to assess the portfolio's exposure to carbon-related assets. Ally understands the importance of our participation in these activities. We will continue to look for data-driven solutions to measuring carbon-related assets and evolve our reporting and analysis accordingly.

### **Investing in coal (Asset owner)**

---

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

No, and we do not plan to assess our portfolio's exposure in the next two years

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

Important, but not immediate priority

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

At this time, we have not had the opportunity to assess the portfolio's exposure to carbon-related assets. Ally understands the importance of our participation in these

activities. We will continue to look for data-driven solutions to measuring carbon-related assets and evolve our reporting and analysis accordingly.

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

---

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

No, and we do not plan to assess our portfolio's exposure in the next two years

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

Important, but not immediate priority

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

At this time, we have not had the opportunity to assess the portfolio's exposure to carbon-related assets. Ally understands the importance of our participation in these activities. We will continue to look for data-driven solutions to measuring carbon-related assets and evolve our reporting and analysis accordingly.

### **Insuring all carbon-related assets**

---

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

No, and we do not plan to assess our portfolio's exposure in the next two years

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

Important, but not immediate priority

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

At this time, we have not had the opportunity to assess the portfolio's exposure to carbon-related assets. Ally understands the importance of our participation in these activities. We will continue to look for data-driven solutions to measuring carbon-related assets and evolve our reporting and analysis accordingly.

### **Insuring coal**

---

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

No, and we do not plan to assess our portfolio's exposure in the next two years

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

Important, but not immediate priority

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

At this time, we have not had the opportunity to assess the portfolio's exposure to carbon-related assets. Ally understands the importance of our participation in these

activities. We will continue to look for data-driven solutions to measuring carbon-related assets and evolve our reporting and analysis accordingly.

### Insuring oil and gas

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

No, and we do not plan to assess our portfolio's exposure in the next two years

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

Important, but not immediate priority

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

At this time, we have not had the opportunity to assess the portfolio's exposure to carbon-related assets. Ally understands the importance of our participation in these activities. We will continue to look for data-driven solutions to measuring carbon-related assets and evolve our reporting and analysis accordingly.

## C-FS14.1

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

	We conduct analysis on our portfolio's impact on the climate	Please explain why you do not measure the impact of your portfolio on the climate
Banking (Bank)	No, but we plan to do so in the next two years	In 2021, we performed a portfolio-level screening process to identify which of our Scope 3 activities throughout the value chain were relevant and material. We selected the World Resources Institute (WRI) Scope 3 Evaluator tool to quantitatively estimate Ally's Scope 3 GHG emissions footprint. The results of this screening indicated that category 15, investments, was both relevant and material to Ally. We plan to implement further analysis of this category using the recently published Partnership for Financial Accounting methodology in future years. We will continue to look for data-driven solutions to reduce emissions and evolve our strategies accordingly.
Investing (Asset manager)	No, but we plan to do so in the next two years	In 2021, we performed a portfolio-level screening process to identify which of our Scope 3 activities throughout the value chain were relevant and material. We selected the World Resources Institute (WRI) Scope 3 Evaluator tool to quantitatively estimate Ally's Scope 3 GHG emissions footprint. The results of this screening indicated that category 15, investments, was both relevant and material to Ally. We

		plan to implement further analysis of this category using the recently published Partnership for Financial Accounting methodology in future years. We will continue to look for data-driven solutions to reduce emissions and evolve our strategies accordingly.
Investing (Asset owner)	No, but we plan to do so in the next two years	In 2021, we performed a portfolio-level screening process to identify which of our Scope 3 activities throughout the value chain were relevant and material. We selected the World Resources Institute (WRI) Scope 3 Evaluator tool to quantitatively estimate Ally's Scope 3 GHG emissions footprint. The results of this screening indicated that category 15, investments, was both relevant and material to Ally. We plan to implement further analysis of this category using the recently published Partnership for Financial Accounting methodology in future years. We will continue to look for data-driven solutions to reduce emissions and evolve our strategies accordingly.
Insurance underwriting (Insurance company)	No, but we plan to do so in the next two years	In 2021, we performed a portfolio-level screening process to identify which of our Scope 3 activities throughout the value chain were relevant and material. We selected the World Resources Institute (WRI) Scope 3 Evaluator tool to quantitatively estimate Ally's Scope 3 GHG emissions footprint. The results of this screening indicated that category 15, investments, was both relevant and material to Ally. We plan to implement further analysis of this category using the recently published Partnership for Financial Accounting methodology in future years. We will continue to look for data-driven solutions to reduce emissions and evolve our strategies accordingly.

### C-FS14.3

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

	<b>Actions taken to align our portfolio with a 1.5°C world</b>	<b>Please explain why you have not taken any action to align your portfolio with a 1.5°C world</b>
Banking (Bank)	No, but we plan to in the next two years	At this time, we have not had the opportunity to create a targeted action strategy to align our portfolio to a 1.5 degree world. Ally understands the importance of this global initiative and plans to thoughtfully do so within the next two years.



Investing (Asset manager)	No, but we plan to in the next two years	At this time, we have not had the opportunity to create a targeted action strategy to align our portfolio to a 1.5 degree world. Ally understands the importance of this global initiative and plans to thoughtfully do so within the next two years.
Investing (Asset owner)	No, but we plan to in the next two years	At this time, we have not had the opportunity to create a targeted action strategy to align our portfolio to a 1.5 degree world. Ally understands the importance of this global initiative and plans to thoughtfully do so within the next two years.
Insurance underwriting (Insurance company)	No, but we plan to in the next two years	At this time, we have not had the opportunity to create a targeted action strategy to align our portfolio to a 1.5 degree world. Ally understands the importance of this global initiative and plans to thoughtfully do so within the next two years.

## C15. Biodiversity

### C15.1

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

	Board-level oversight and/or executive management-level responsibility for biodiversity-related issues
Row 1	No, and we do not plan to have both within the next two years

### C15.2

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

	Indicate whether your organization made a public commitment or endorsed any initiatives related to biodiversity
Row 1	No, and we do not plan to do so within the next 2 years

### C15.3

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

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

## C15.4

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

	Have you taken any actions in the reporting period to progress your biodiversity-related commitments?
Row 1	No, and we do not plan to undertake any biodiversity-related actions

## C15.5

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

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

## C15.6

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

Report type	Content elements	Attach the document and indicate where in the document the relevant biodiversity information is located
No publications		

## C16. 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.**

### C16.1

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

Job title	Corresponding job category

Row 1	Chief Executive Officer (CEO)	Chief Executive Officer (CEO)
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## FW-FS Forests and Water Security (FS only)

### FW-FS1.1

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

	Board-level oversight of this issue area	Explain why your organization does not have board-level oversight of this issue area and any plans to address this in the future
Forests	No, but we plan to within the next two years	Ally recognizes the increasing importance of assessing the ways that our organization may be potentially impacted by forest and water related issues. Ally inherently incorporates climate related risks into our risk management processes. We intend to evolve our existing climate related assessments to identify additional climate-related risks as they evolve. Ally's management and the Board regularly consider climate-related risk and its impact on the business. These considerations will continue to evolve alongside available data, reporting frameworks, governmental regulation, and industry collaboration.
Water	No, but we plan to within the next two years	Ally recognizes the increasing importance of assessing the ways that our organization may be potentially impacted by forest and water related issues. Ally inherently incorporates climate related risks into our risk management processes. We intend to evolve our existing climate related assessments to identify additional climate-related risks as they evolve. Ally's management and the Board regularly consider climate-related risk and its impact on the business. These considerations will continue to evolve alongside available data, reporting frameworks, governmental regulation, and industry collaboration.

### FW-FS1.1c

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

#### Forests

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

No, but we plan to address this within the next two years

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

Important but not an immediate priority

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

The Board of Directors and executive management regularly review all risks including those related to climate change. As Ally continues to mature our climate risk management processes and climate change mitigation strategies, ongoing education and overall understanding of the potential impacts of climate change, and the importance of forest and water related issues as it relates to climate change adaptation, will remain a priority.

## Water

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

No, but we plan to address this within the next two years

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

Important but not an immediate priority

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

The Board of Directors and executive management regularly review all risks including those related to climate change. As Ally continues to mature our climate risk management processes and climate change mitigation strategies, ongoing education and overall understanding of the potential impacts of climate change, and the importance of forest and water related issues as it relates to climate change, will remain a priority.

## FW-FS1.2

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

---

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

Chief Executive Officer (CEO)

### **Reporting line**

Reports to the Board directly

### **Issue area(s)**

Forests  
Water

### **Responsibility**

Both assessing and managing risks and opportunities

### **Coverage of responsibility**

Risks and opportunities related to our banking portfolio  
Risks and opportunities related to our investing (asset ownership) activities

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

As important matters arise

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

Chief Risks Officer (CRO)

**Reporting line**

CEO reporting line

**Issue area(s)**

Forests

Water

**Responsibility**

Both assessing and managing risks and opportunities

**Coverage of responsibility**

Risks and opportunities related to our banking portfolio

Risks and opportunities related to our investing (asset ownership) activities

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

As important matters arise

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

Other C-Suite Officer, please specify

Chief Administrative Officer

**Reporting line**

CEO reporting line

**Issue area(s)**

Forests

Water

**Responsibility**

Both assessing and managing risks and opportunities

**Coverage of responsibility**

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

Not reported to the board

## FW-FS2.1

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

	We assess our portfolio's exposure to this issue area	Explain why your portfolio's exposure is not assessed for this issue area and any plans to address this in the future
Banking - Forests exposure	No, but we plan to within the next two years	We have not had the opportunity to evaluate portfolio exposure specifically to forests and water related issues, however, we intend to do so within the next two years. Ally understands the importance of our participation in these activities and is working towards that goal.
Banking – Water exposure	No, but we plan to within the next two years	We have not had the opportunity to evaluate portfolio exposure specifically to forests and water related issues, however, we intend to do so within the next two years. Ally understands the importance of our participation in these activities and is working towards that goal.
Investing (Asset owner) – Water exposure	No, but we plan to within the next two years	We have not had the opportunity to evaluate portfolio exposure specifically to forests and water related issues, however, we intend to do so within the next two years. Ally understands the importance of our participation in these activities and is working towards that goal.

## FW-FS2.2

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

	We consider forests- and/or water-related information	Explain why information related to this issue area is not considered and any plans to address this in the future
Banking – Forests-related information	No, and we do not plan to in the next two years	We have not had the opportunity to evaluate client/investee risk specifically for forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.
Banking – Water-related information	No, and we do not plan to in the next two years	We have not had the opportunity to evaluate client/investee risk specifically for forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.
Investing (Asset owner) – Water-related information	No, and we do not plan to in the next two years	We have not had the opportunity to evaluate client/investee risk specifically for forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.

### FW-FS2.3

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

	Risks identified for this issue area	Primary reason why your organization has not identified any substantive risks for this issue area	Explain why your organization has not identified any substantive risks for this issue area
Forests	No	Not yet evaluated	We have not had the opportunity to evaluate risk specifically for forests and water related issues. Ally understands the importance of our participation in these activities and we will continue to evaluate opportunities for improvement in this area.
Water	No	Not yet evaluated	We have not had the opportunity to evaluate risk specifically for forests and water related issues. Ally understands the importance of our participation in these activities and we will continue to evaluate opportunities for improvement in this area.

### FW-FS2.4

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

	Opportunities identified for this issue area	Primary reason why your organization has not identified any substantive opportunities for this issue area	Explain why your organization has not identified any substantive opportunities for this issue area
Forests	No	Not yet evaluated	We have not had the opportunity to evaluate opportunities specifically for forests and water related issues. Ally understands the importance of our participation in these activities and we will continue to evaluate opportunities for improvement in this area.
Water	No	Not yet evaluated	We have not had the opportunity to evaluate opportunities specifically for forests and water related issues. Ally understands the

			importance of our participation in these activities and we will continue to evaluate opportunities for improvement in this area.
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## FW-FS3.1

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

### Forests

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

No, we do not take risks and opportunities into consideration

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

As of 2021, we have not had the opportunity to evaluate forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.

### Water

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

No, we do not take risks and opportunities into consideration

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

As of 2021, we have not had the opportunity to evaluate forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.

## FW-FS3.2

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

### Forests

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

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

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



We have not had the opportunity to evaluate forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.

**Water**

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

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

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

We have not had the opportunity to evaluate forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.

**FW-FS3.3**

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

	<b>Existing products and services that enable clients to mitigate deforestation and/or water insecurity</b>	<b>Explain why your organization does not offer products and services which enable clients to mitigate deforestation and/or water insecurity and any plans to address this in the future</b>
Forests	No, and we do not plan to address this in the next two years	We have not had the opportunity to evaluate forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.
Water	No, and we do not plan to address this in the next two years	We have not had the opportunity to evaluate forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.

**FW-FS3.4**

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

	<b>Policy framework includes this issue area</b>	<b>Explain why your organization does not include this issue area in the policy framework and any plans to address this in the future</b>
Forests	No, and we do not plan to include this issue area in the next two years	We have not had the opportunity to evaluate forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.

Water	No, and we do not plan to include this issue area in the next two years	We have not had the opportunity to evaluate forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.
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### FW-FS3.5

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

	Covenants included in financing agreements to reflect and enforce policies for this issue area	Explain why your organization does not include covenants for this issue area in financing agreements and any plans to address this in the future
Forests	No, and we do not plan to in the next two years	We have not had the opportunity to evaluate forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.
Water	No, and we do not plan to in the next two years	We have not had the opportunity to evaluate forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.

### FW-FS4.1

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

	We engage with clients/investees on this issue area	Explain why you do not engage with your clients/investees on the issue area and any plans to address this in the future
Clients – Forests	No, and we do not plan to in the next two years	We have not had the opportunity to evaluate forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.
Clients – Water	No, and we do not plan to in the next two years	We have not had the opportunity to evaluate forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.
Investees – Water	No, and we do not plan to in the next two years	We have not had the opportunity to evaluate forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.

## FW-FS4.2

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

	We exercise voting rights as a shareholder on this issue area	Explain why your organization does not exercise voting rights on this issue area and any plans to address this in the future
Forests	No, and we do not plan to in the next two years	We have not had the opportunity to evaluate forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.
Water	No, and we do not plan to in the next two years	We have not had the opportunity to evaluate forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.

## FW-FS4.3

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

	Provide financing and/or insurance to smallholders in the agricultural commodity supply chain	Primary reason for not providing finance and/or insurance to smallholders	Explain why your organization does not provide finance/insurance to smallholders and any plans to change this in the future
Row 1	No, and we do not plan to in the next two years	Not a strategic focus	We have not had the opportunity to evaluate forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.

## FW-FS4.4

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

	Direct or indirect engagement that could influence policy, law, or regulation that may impact this issue area	Primary reason for not engaging in activities that could directly or indirectly influence policy, law, or regulation that may impact this issue area	Explain why you do not engage in activities that could directly or indirectly influence policy, law, or regulation that may impact this issue area
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Forests	No, and we do not plan to in the next two years	Important but not an immediate priority	We have not had the opportunity to evaluate forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.
Water	No, and we do not plan to in the next two years	Important but not an immediate priority	We have not had the opportunity to evaluate forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.

### FW-FS5.1

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

	We measure our portfolio impact on this issue area	Primary reason for not measuring portfolio impact on this issue area	Explain why your organization does not measure its portfolio impact on this issue area and any plans to change this in the future
Banking – Impact on Forests	No, and we don't plan to in the next two years	Important but not an immediate priority	We have not had the opportunity to evaluate forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.
Banking – Impact on Water	No, and we don't plan to in the next two years	Important but not an immediate priority	We have not had the opportunity to evaluate forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.
Investing (Asset owner) – Impact on Water	No, and we don't plan to in the next two years	Important but not an immediate priority	We have not had the opportunity to evaluate forests and water related issues. Ally understands the importance of our participation in these activities and will continue to evaluate opportunities for improvement in this area.

## FW-FS5.2

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

	Finance or insurance provided to companies operating in the supply chain for this commodity	Amount of finance/insurance provided will be reported	Explain why your organization is unable to report on the amount of finance/insurance provided for this commodity
Lending to companies operating in the timber products supply chain	Yes	No, but we plan to assess our portfolio's exposure to this commodity in the next two years	Ally is not currently prepared to disclose the amount of lending to companies that operate in the timber products supply chain. Ally understands the importance of disclosure and we intend to assess our exposure in the next two years.
Lending to companies operating in the palm oil products supply chain	No		
Lending to companies operating in the cattle products supply chain	No		
Lending to companies operating in the soy supply chain	No		
Lending to companies operating in the rubber supply chain	No		
Lending to companies operating in the	No		

cocoa supply chain			
Lending to companies operating in the coffee supply chain	No		

## FW-FS6.1

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

**Publication**

No publications

**Status**

**Attach the document**

**Page/Section reference**

**Content elements**

**Comment**

## Submit your response

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

English

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

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

**Please confirm below**

I have read and accept the applicable Terms