Welcome to your CDP Climate Change Questionnaire 2023

C0. Introduction

C0.1

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

Ally Financial Inc. (NYSE: ALLY) is a financial services company with the nation's largest all-digital bank and an industry-leading auto financing business, driven by a mission to "Do It Right" and be a relentless ally for customers and communities. The company serves more than 11 million customers through a full range of online banking services (including deposits, mortgage, point-of-sale personal lending, and credit card products) and securities brokerage and investment advisory services. The company also includes a robust corporate finance business that offers capital for equity sponsors and middle-market companies, as well as auto financing and insurance offerings.

Ally is a Delaware corporation and is registered as a BHC under the BHC Act and an FHC under the GLB Act. 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. Beginning in December 2021 with the acquisition of Fair Square, which we rebranded as Ally Credit Card, financial information for 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, 2022, Ally Bank had total assets of $181.9 billion, and total nonaffiliate deposits of $152.3 billion.

Our long-term strategic objectives are centered around (1) differentiating our company as a relentless ally for financial well-being for consumer and commercial customers, (2) leveraging our "Do it Right" culture to drive enhanced value for our customers, communities, employees, and stockholders, (3) growing and diversifying our leading auto, insurance, and digital-bank platforms through increased scale and expanded product solutions to meet customer needs, (4) driving ongoing customer growth and relationship deepening, (5) operating under efficient, disciplined risk management and capital allocation approaches, (6) out-executing our competition and creating differentiated advantages through continuous investment and evolution among our leading experiences, products and brand, and (7) delivering long-term value 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 foward-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 years	Select the number of past reporting years you will be providing Scope 1 emissions data for	Select the number of past reporting years you will be providing Scope 2 emissions data for	Select the number of past reporting years you will be providing Scope 2 emissions data for
Reporting Year	January 31, 2022	December 31, 2022	Yes	1 year	Not providing past emissions data for scope 2	1 year

C0.3

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

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		Exposed to all broad market sectors
Investing (Asset manager)	Yes		Exposed to all broad market sectors
Investing (Asset owner)	Yes		Exposed to all broad market sectors
Insurance underwriting (Insurance company)	Yes	General (non-life)	None of the above

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 privide 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. Within Ally's 2022 Corporate Social Responsibility Report, the CEO Letter provides examples of climate-related actions made, including: - Submitting Ally's CDP (formerly the Carbon Disclosure Project) climate change questionnaire - Utilizing high-quality carbon offsets and Green-e® certified Renewable Energy Certificates to achieve operational carbon neutrality for Ally's 2020 Scope 1 and Scope 2 emissions - Appointed a Sustainability Risk Executive and established a Sustainability Office to help in developing and executing Ally's efforts across the enterprise
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. Examples of climate-related actions made by these Committees include annual review, since 2021 of Ally's ESG strategies, initiatives, and activities, including 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	Overseeing and guiding employee incentives Reviewing and guiding strategy Overseeing and guiding scenario analysis Overseeing value chain engagement Reviewing and guiding the risk management process Other, please specify The Board and management regularly consider all risks to the business, including those relating to climate.	Climate-related risks and opportunities to our own operations Climate-related risks and opportunities to our banking activities Climate-related risks and opportunities to our investment activities Climate-related risks and opportunities to our insurance underwriting activities The impact of our own operations on the climate	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 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 Sustainability Risk Executive. Examples of climate-related actions made by these Committees include: - Oversaw the appointment of a Sustainability Risk Executive and established a sustainability office in 2021 to build out and create a holistic enterprise sustainability strategy - Annual review, since 2021 of Ally's ESG strategies, initiatives, and activities, including climate-related issues

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	- Integrating climate-related issues into the strategy - Assessing climate-related risks and opportunities - 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	- Integrating climate-related issues into the strategy - Conducting climate-related scenario analysis - Assessing climate-related risks and opportunities - 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

Name of the position(s) and/or commit-tee(s)	Reporting line	Responsibility	Coverage of responsibility	Frequency of reporting to the board on climate-related issues
Other C-Suite Officer, please specify (Chief Administrative Officer)	CEO reporting line	- Managing major capital and/or operational expenditures related to low-carbon products or services (including R&D) - Assessing climate-related risks and opportunities - 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	Yes	

C1.3a

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

Entitled to incentive	Type of incentive	Incentive(s)	Performance indicator(s)	Incentive plan(s) this incentive is linked to
Chief Risks Officer (CRO)	Monetary reward	Other, please specify Discretionary incentive pay plan without weighted metrics	Other (please specify) Incentive-compensation decisions are determined by Company and individual performance to a balanced scorecard and pre-established goals and objectives, which include ESG achievements, such as climate and environmental impacts.	Short-Term Incentive Plan

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. Ally does not currently offer ESG based elections for retirement programs, but as Ally's sustainability requirements mature, Ally will consider ways to balance climate considerations with the fiduciary responsibilities of the programs.

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	
Medium-term	1	3	
Long-term	3	10	

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 its strategy. There are four indicators, depending on the business line and to the extent practicable, used to determine when a risk has substantive financial or strategic impact: financial, employee/customer consequence, compliance and reputation, with specific targets and metrics governing this criteria.

C2.2

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

Value chain stage(s) covered

Direct operations

Risk management process

Integrated into multi-disciplinary company-wide risk management process

Frequency of assessment

Annually

Time horizon(s) covered

Short-term
Medium-term
Long-term

Description of process

In 2022, Ally continued to advance the enterprise climate-related risk management program. Ally leveraged the Enterprise Risk Management (ERM) framework to identify potential existing and emerging climate-related risks by conducting qualitative climate-related risk reviews to understand potential risk transmission channels that could impact operations, financial performance, employees, value chain, strategic decision-making and brand reputation. The potential climate-related risks identified were then classified into ten (10) primary risk types— credit, insurance / underwriting, liquidity, market, business / strategic, operational,
technology, compliance, and reputational risk. This initial risk identification effort is an important first step in evaluating Ally's climate risk exposure, both physical and transition, and developing an appropriate risk mitigation strategy.

As part of how Ally P&C Insurance manages climate-related physical risk, Ally's actuarial pricing analysis incorporates projected weather losses to allow Ally to properly and adequately price for insured risks. Changes in frequency or severity of weather events are reflected in these loss projections. Ally's 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.

Accurately assessing climate-related risks is a challenge given the complexity and dynamic evolution of climate-related data and the availability of relevant analytical tools. Ally is actively collaborating with peers and leaning into strategic relationships to evaluate available options to assist efforts and enhance the climate strategy. One such option is the use of climate risk scenario analysis which covers plausible, relevant and challenging variations of potential impacts of climate change. The outcomes of these scenarios provide qualitative and quantitative insights into how Ally could manage climate-related risks that are relevant to Ally's business model.

Ally used climate risk scenario analysis, which is a valuable tool in identifying, understanding, and measuring both physical and

transition risks due to climate change, to begin evaluating the extent to which climate risks could impact Ally's business. In 2022, Ally developed and executed a preliminary scenario analysis focused on potential physical risk impacts from river floods and wildfires. The analysis was conducted on Ally's commercial insurance portfolio through geospatial analysis in the years 2030, 2050, and 2100, leveraging scenarios and data provided by the Network for Greening the Financial System (NGFS). This effort enabled Ally to begin evaluating the extent to which a rapidly changing climate could impact customers' exposure to certain physical risks. Ally will continue to evolve and expand the climate risk scenario analysis approach to evaluate potential impacts on additional business lines, explore transition risk scenarios, and further Ally's ability to provide quantitative risk assessments on an annual basis. These efforts will augment the development of additional capabilities to assess, monitor, and report on both short and long term potentially material climate-related risks and opportunities.2050, and 2100, leveraging scenarios and data provided by the Network for Greening the Financial System (NGFS). This effort enabled Ally to begin evaluating the extent to which a rapidly changing climate could impact customers' exposure to certain physical risks. Ally will continue to evolve and expand the climate risk scenario analysis approach to evaluate potential impacts on additional business lines, explore transition risk scenarios, and further Ally's ability to provide quantitative risk assessments on an annual basis. These efforts will augment the development of additional capabilities to assess, monitor, and report on both short and long term potentially material climate-related risks and opportunities.

C2.2a

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

	Relevance & inclusion	Please explain
Current regulation	Relevant, always included	Regulatory and legal impacts to Ally due to non-compliance with existing climate-related laws and regulations and exposure to litigation from real or perceived customer harm driven by the transition to a low carbon economy were considered as part of Ally's qualitative climate-related risk reviews across relevant, internal stakeholders, which were completed in 2022. These qualitative climate-related risk reviews, structured in alignment with TCFD recommendations, helped Ally understand potential risk transmission channels that could impact operations, financial performance, employees, value chain, strategic decision-making and brand reputation, setting the foundation for developing an appropriate risk mitigation strategy that works for Ally.

	Relevance & inclusion	Please explain
Emerging regulation	Relevant, always included	Regulatory and legal impacts to Ally due to non-compliance with emerging climate-related laws and regulations and exposure to litigation from real or perceived customer harm driven by the transition to a low carbon economy were considered as part of Ally's qualitative climate-related risk reviews across relevant, internal stakeholders, which were completed in 2022. These qualitative climate-related risk reviews, structured in alignment with TCFD recommendations, helped Ally understand potential risk transmission channels that could impact operations, financial performance, employees, value chain, strategic decision-making and brand reputation, setting the foundation for developing an appropriate risk mitigation strategy that works for Ally. A key input into the development of Ally's strategic response to managing climate-related risk and opportunities is the participation in industry forums to respond to regulatory developments and share best practices with peers. Ally's Sustainability Office is engaged in multiple climate risk consortiums and events, including those convened by the Risk Management Association, Bank Policy Institute, American Bankers Association, McKinsey & Company and Ceres.
Technology	Relevant, always included	Potential impacts to Ally for increased costs to operationalize emissions reductions (e.g., transitioning to new technologies that reduce energy use and/or emissions, such as a solar array feasibility study) were considered as part of Ally's qualitative climate-related risk reviews across relevant, internal stakeholders, which were completed in 2022. These qualitative climate-related risk reviews, structured in alignment with TCFD recommendations, helped Ally understand potential risk transmission channels that could impact operations, financial performance, employees, value chain, strategic decision-making and brand reputation, setting the foundation for developing an appropriate risk mitigation strategy that works for Ally.
Legal	Relevant, always included	Ally's potential exposure to litigation from real or perceived customer harm driven by transition to low carbon economy was considered as part of Ally's qualitative climate-related risk reviews across relevant, internal stakeholders, which were completed in 2022. These qualitative climate-related risk reviews, structured in alignment with TCFD recommendations, helped Ally understand potential risk transmission channels that could impact operations, financial performance, employees, value chain, strategic decision-making and brand reputation, setting the foundation for developing an appropriate risk mitigation strategy that works for Ally.

	Relevance & inclusion	Please explain
Market	Relevant, always included	Potential impacts to Ally from market impacts due to unusual levels of price volatility or market dysfunction exacerbated by changes in climate drivers (e.g., carbon tax, supply chain disruption, change in consumer behavior) and the potential effects on economic activity, asset prices, deposit trends and other means of funding, and customer hardship were considered as part of Ally's qualitative climate-related risk reviews across relevant, internal stakeholders, which were completed in 2022. These qualitative climate-related risk reviews, structured in alignment with TCFD recommendations, helped Ally understand potential risk transmission channels that could impact operations, financial performance, employees, value chain, strategic decision-making and brand reputation, setting the foundation for developing an appropriate risk mitigation strategy that works for Ally.
Reputation	Relevant, always included	Potential impacts to Ally's reputation that could arise from changing stakeholder expectations (including shifts in consumer preferences) around climate-related commitments and perceptions of Ally's performance and execution of climate-related strategies were considered as part of Ally's qualitative climate-related risk reviews across relevant, internal stakeholders, which were completed in 2022. These qualitative climate-related risk reviews, structured in alignment with TCFD recommendations, helped Ally understand potential risk transmission channels that could impact operations, financial performance, employees, value chain, strategic decision-making and brand reputation, setting the foundation for developing an appropriate risk mitigation strategy that works for Ally.
Acute physical	Relevant, always included	Potential impacts to Ally from acute weather events, such as hurricanes and ice storms, causing more frequent business disruptions were considered as part of Ally's qualitative climate-related risk reviews across relevant, internal stakeholders, which were completed in 2022. For example, acute weather events can cause damage to Ally's facilities, impact colleague work schedules, and increase data center downtime and outages across third-party services. These qualitative climate-related risk reviews, structured in alignment with TCFD recommendations, helped Ally understand potential risk transmission channels that could impact operations, financial performance, employees, value chain, strategic decision-making and brand reputation, setting the foundation for developing an appropriate risk mitigation strategy that works for Ally.
Chronic physical	Relevant, always included	Potential impacts to Ally from flawed assumptions or poor strategy execution in geographies with increasing exposure to chronic severe weather events or sea-level rise were considered as part of Ally's qualitative climate-related risk reviews across relevant, internal stakeholders, which were completed in 2022. For example, the impacts of chronic and severe climate events can affect economic activity and asset prices, deposit trends and other means of funding, and customer hardship. These qualitative climate-related risk reviews, structured in alignment with TCFD recommendations, helped Ally understand potential risk transmission channels that could impact operations, financial performance, employees, value chain, strategic decision-making and brand reputation, setting the foundation for developing an appropriate risk mitigation strategy that works for Ally.

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.

Banking

Type of risk management process

A specific climate-related risk management process

Proportion of portfolio covered by risk management process

100

Type of assessment

Qualitative and quantitative

Time horizon(s) covered

Short-term
Medium-term
Long-term

Tools and methods used

Internal tools/methods

Provide the rationale for implementing this process to assess your portfolio's exposure to climate-related risks and opportunities

In 2022, Ally leveraged the Enterprise Risk Management (ERM) framework to identify potential existing and emerging climate-related risks to the banking portfolio by conducting qualitative climate-related risk reviews with relevant, internal stakeholders. These reviews helped Ally understand potential risk transmission channels that could impact operations, financial performance, employees, value chain, strategic decision-making and brand reputation. This initial risk identification effort is an important first step in evaluating Ally's climate risk exposure, both physical and transition, and developing an appropriate risk mitigation strategy.
Accurately assessing climate-related risks is a challenge given the complexity and dynamic evolution of climate-related data

and the availability of relevant analytical tools. Ally is actively collaborating with peers and leaning into strategic relationships to evaluate available options to assist efforts and enhance the climate strategy that works for Ally. One such option is the use of climate risk scenario analysis which considers plausible, relevant and challenging variations of potential impacts of climate change. The outcomes of these scenarios provide qualitative and quantitative insights into potential climate-related risk mitigation strategies that are relevant to Ally's business model. In 2022, Ally used climate risk scenario analysis to begin to evaluate the extent to which climate risks could impact the business. Ally is working strategically to integrate climate-related insights into its decision-making and striving to help Ally's suppliers do the same.

Investing (Asset manager)

Type of risk management process
A specific climate-related risk management process

Proportion of portfolio covered by risk management process

100

Type of assessment

Qualitative only

Time horizon(s) covered

Short-term
Medium-term
Long-term

Tools and methods used

Internal tools/methods

Provide the rationale for implementing this process to assess your portfolio's exposure to climate-related risks and opportunities
In 2022, Ally continued to leverage the findings from the TCFD Workshop completed in 2021 with internal stakeholders which identified climate related risks, and conducted a high-level, preliminary risk assessment of Ally's investment portfolio as an asset manager. Ally plans 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)

Type of risk management process
A specific climate-related risk management process

Proportion of portfolio covered by risk management process

100

Type of assessment

Qualitative only

Time horizon(s) covered

Short-term
Medium-term
Long-term

Tools and methods used

Internal tools/methods

Provide the rationale for implementing this process to assess your portfolio's exposure to climate-related risks and opportunities

In 2022, Ally continued to leverage the findings from the TCFD Workshop completed in 2021 with internal stakeholders which identified climate related risks, and conducted a high-level, preliminary risk assessment of Ally's investment portfolio as an asset owner. Ally plans 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)

Type of risk management process

A specific climate-related risk management process

Proportion of portfolio covered by risk management process

100

Type of assessment

Qualitative and quantitative

Time horizon(s) covered

Short-term
Medium-term
Long-term

Tools and methods used

Internal tools/methods

Provide the rationale for implementing this process to assess your portfolio's exposure to climate-related risks and opportunities

In 2022, Ally leveraged the Enterprise Risk Management (ERM) framework to identify potential existing and emerging climate-re-

lated risks to insurance underwriting by conducting qualitative climate-related risk reviews with relevant, internal stakeholders. These reviews helped Ally understand potential risk transmission channels that could impact operations, financial performance, employees, value chain, strategic decision-making and brand reputation. This initial risk identification effort is an important first step in evaluating Ally's climate risk exposure, both physical and transition, and developing an appropriate risk mitigation strategy.

Accurately assessing climate-related risks is a challenge given the complexity and dynamic evolution of climate-related data and the availability of relevant analytical tools. Ally is actively collaborating with peers and leaning into strategic relationships to evaluate available options to assist efforts and enhance the climate strategy that works for Ally. One such option is the use of climate risk scenario analysis which considers plausible, relevant and challenging variations of potential impacts of climate change. The outcomes of these scenarios provide qualitative and quantitative insights into how Ally could manage climate-related risks that are relevant to its business model.

Ally used climate risk scenario analysis, which is a valuable tool in identifying, understanding, and measuring both physical and transition risks due to climate change, to begin evaluating the extent to which climate risks could impact Ally's business. In 2022, Ally developed and executed a preliminary scenario analysis focused on potential physical risk impacts from river floods and wildfires. The analysis was conducted on Ally's commercial insurance portfolio through geospatial analysis in the years 2030, 2050, and 2100, leveraging scenarios and data provided by the Network for Greening the Financial System (NGFS). This effort enabled Ally to begin evaluating the extent to which a rapidly changing climate could impact customers' exposure to certain physical risks. Ally will continue to evolve and expand the climate risk scenario analysis approach to evaluate potential impacts on additional business lines, explore transition risk scenarios, and further Ally's ability to provide quantitative risk assessments on an annual basis. These efforts will augment the development of additional capabilities to assess, monitor, and report on both short and long term potentially material climate-related risks and opportunities.

Additionally, as part of how Ally P&C Insurance business manages climate related physical risk, the portfolio's exposure to weather losses is assessed, which includes weather losses resulting from changes in climate over time. Ally Insurance also complies with the State of California Climate Risk Initiative (2015) that contains restrictions on investments related to thermal coal enterprises.

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	

	We consider climate-related information	Explain why you do not consider climate-related information and your plans to address this in the future
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 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.

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.
As part of onboarding conversations for prospective Wealth Management clients, information is sought by the Wealth Advisor related to the portfolio preferences of the client. This includes their interest in Impact Portfolios - defined as diversified asset allocation strategies designed for purpose and impact, such as exposure to environmental, social and governance ("ESG") ETFs. For clients interested in those portfolios, the Wealth Advisor includes those specific portfolio types for consideration.

C2.3

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

Yes

C2.3a

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

Identifier

Risk 1

Where in the value chain does the risk driver occur?

Direct operations

Risk type & Primary climate-related risk driver

Acute physical
Cyclone, hurricane, typhoon

Primary potential financial impact

Increased indirect (operating) costs

Climate risk type mapped to traditional financial services industry risk classification

Operational risk

Company-specific description

Ally recognizes that climate-related risks and levels of business disruption are likely to increase due to the increased frequency and severity of climate-related events. As a result, in 2022, Ally assessed the potential magnitude of losses due to operational risk and the level of business resiliency of Ally's operations in a single geographic region.

The short-term scenario considered the physical risk associated with increased frequency and intensity of natural disasters as a result of climate change. Specifically, the scenario assumed the following:

- Two low frequency (1 in 500 years) storms are experienced in a span of six months. A Category 4 hurricane with heavy and sustained rainfall, storm surge, and high winds is experienced, followed by another severe convective storm (hail, tornado,

and high winds).

Time horizon

Short-term

Likelihood

More likely than not

Magnitude of impact

Low

Are you able to provide a potential financial impact figure?

Yes, an estimate range

Potential financial impact figure (currency)

Potential financial impact figure–minimum (currency)

0

Potential financial impact figure–minimum (currency)

1,400,000

Explanation of financial impact figure

An Operational Risk Loss represents the direct financial impact resulting from the estimated cost to repair impacted facilities.

Cost of response to risk

1,400,000

Description of response and explanation of cost calculation

Scenario assumes repair cost of $350 per square foot. Based on actual historical observations, the scenario also assumes that critical work can either be 1) transferred to other Ally locations, 2) supported by employees working remotely, 3) supported by current vendors that are not impacted by the scenario or 4) temporarily delayed incurring no additional costs.

C2.4

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

Yes

C2.4a

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

Identifier

Opp 1

Where in the value chain does the opportunity occur?

Direct operations

Opportunity type

Resource efficiency

Primary climate-related opportunity driver

Move to more efficient buildings

Primary potential financial impact

Reduced indirect (operating) costs

Company-specific description

In 2022, Ally focused on delivering more sustainable operations and developing reduction strategies that align with the recommendations from the TCFD and improve environmental performance metrics. Ally conducted a focused energy study at an owned site, prior to commencing renovations. This study resulted in the approval of direct capital investment to replace an existing gas-powered HVAC system to a more efficient electric system and reduce overall emissions. Additionally, after a review of Ally's HVAC operations at Ally's largest facility in Charlotte, efficiency and run-time adjustments were made to the HVAC systems to reduce energy usage and associated emissions.

Time horizon

Short-term

Likelihood

Very likely

Magnitude of impact

Medium-low

Are you able to provide a potential financial impact figure?

Yes, a single figure estimate

Potential financial impact figure (currency)

360,000

Potential financial impact figure–minimum (currency)

Potential financial impact figure–maximum (currency)

Explanation of financial impact figure

The potential financial impact is calculated by annualizing estimated reductions in energy relative to baseline usage, multiplied by local energy rates.

Cost to realize opportunity

2,400,000

Strategy to realize opportunity and explanation of cost calculation

Ally conducted a focused energy study at an owned site, prior to commencing renovations. This study resulted in the approval of direct capital investment to replace an existing gas-powered HVAC system to a more efficient electric system and reduce overall emissions. Additionally, after a review of Ally's HVAC operations at Ally's largest facility in Charlotte, efficiency and run-time adjustments were made to the HVAC systems to reduce energy usage and associated emissions.

Identifier

Opp 2

Where in the value chain does the opportunity occur?

Insurance underwriting portfolio

Opportunity type

Products and services

Primary climate-related opportunity driver

Shift in consumer preferences

Primary potential financial impact

Increased revenues resulting from increased demand for products and services

Company-specific description

Ally recognizes that both demand and supply for EVs is expected to increase, with the industry projecting electric cars to account for 60% of new car sales by 2030. In October of 2022, Ally launched a new vehicle service contract product – Major Guard EV – specifically for EVs, enabling Ally's dealer customers to provide additional value and coverage to their EV customers.

Time horizon

Short-term

Likelihood

Virtually certain

Magnitude of impact

Low

Are you able to provide a potential financial impact figure?

No, we do not have this figure

Potential financial impact figure (currency)

Potential financial impact figure–minimum (currency)

Potential financial impact figure–maximum (currency)

Explanation of financial impact figure

Ally's Major Guard EV product is in the initial phases of launch, with active contracts in the market since the October 2022 release. Ally will continue to monitor the market as it evolves and as Ally's EV customer base grows.

Cost to realize opportunity

0

Strategy to realize opportunity and explanation of cost calculation

The launch of Ally's Major Guard EV product was absorbed as part of existing product development activities.

Identifier

Opp 3

Where in the value chain does the opportunity occur?

Banking portfolio

Opportunity type

Products and services

Primary climate-related opportunity driver

Shift in consumer preferences

Primary potential financial impact

Increased revenues resulting from increased demand for products and services

Company-specific description

Ally recognizes that both demand and supply for EVs is expected to increase, with the industry projecting electric cars to account for 60% of new car sales by 2030. To make the shift, dealerships may need to make significant infrastructure changes, including the installation of charging stations, upgraded electrical systems, additional inventory space and new car lifts to

support the heavier weight of EVs, plus specialized training for staff. Ally Dealership Financial Services supports dealers by providing working capital loans to make their facilities EV-ready.

Time horizon

Short-term

Likelihood

Very likely

Magnitude of impact

Low

Are you able to provide a potential financial impact figure?

Yes, an estimated range

Potential financial impact figure (currency)

Potential financial impact figure–minimum (currency)

400,000

Potential financial impact figure–maximum (currency)

5,000,000

Explanation of financial impact figure

Based on product yield required to meet minimum return hurdle for an estimated total loan portfolio size. Financial impact is estimated incremental revenue on an annualized basis.

Cost to realize opportunity

0

Strategy to realize opportunity and explanation of cost calculation

The product opportunity is absorbed into business-as-usual activities.

C3. Business Strategy

C3.1

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

Yes

	Climate Transition plan	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
Row 1	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	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
Yes, qualitative and quantitative

C3.2a

(C3.2a) Provide details of your organization's use of climate-related scenario analysis.

Climate-related scenario	Scenario analysis coverage	Temperature alignment of scenario	Parameters, assumptions, analytical choices
Physical climate scenarios Customized publicly available physical scenario	Portfolio	3.1°C - 4°C	The Sustainability Office partnered with the Insurance Catastrophe Modeling team to conduct a chronic physical risk scenario analysis to assist Ally in identifying and considering potential long-term impacts to Ally due to climate change. This climate risk scenario analysis considered plausible, relevant, and challenging variations of the impacts of climate change that allowed Ally to gain a better understanding of climate risks and opportunities. Potential impacts from river flood and wildfire were assessed on Ally's commercial insurance portfolio through geospatial analysis in the years 2030, 2050, and 2100, leveraging scenarios and data provided by the Network for Greening the Financial System (NGFS).

Climate-related scenario	Scenario analysis coverage	Temperature alignment of scenario	Parameters, assumptions, analytical choices
Physical climate scenarios Customized publicly available physical scenario	Facility	Unknown	Ally recognizes that climate-related risks and levels of business disruption are likely to increase due to the increased frequency and severity of climate-related events. As a result, in 2022, Ally assessed the potential magnitude of losses due to operational risk and the level of business resiliency of one of Ally's operations in a single geographic region. The short-term scenario considered the physical risk associated with increased frequency and intensity of natural disasters as a result of climate change. Specifically, the scenario assumed the following: Two low frequency (1 in 500 years) storms are experienced in a span of six months. A Category 4 hurricane with heavy and sustained rainfall, storm surge, and high winds is experienced, followed by another severe convective storm (hail, tornado, and high winds).

C3.2b

(C3.2b) Provide details of the focal questions your organization seeks to address by using climate-related scenario analysis, and summarize the results with respect to these questions.

Focal questions

1. What is the variance in exposure to fire and river flood hazards over various time horizons under different climate change scenarios for commercial properties insured by Ally?

2. What is Ally's potential operational risk loss exposure and resiliency to near-term impacts of acute weather events exacerbated by climate change?

Results of the climate-related scenario analysis with respect to the focal questions

1. Ally analyzed the variance of fire and river flood hazard risks of each property location, providing insight and quantification of the potential for changes in physical risk exposure related to different climate change scenarios over time and informing Ally of the potential financial impact of insuring dealer inventory at those properties. Results of this analysis prompted Ally's decision to review the current capabilities of the insurance catastrophe model and recommend inclusion of longer-term climate-related considerations when evaluating insurance portfolio exposure. Climate-related loss functions are planned to be added to the model in the future to enable further risk management.

Flood mapping results also prompted Ally's decision to review in 2023 the current FEMA flood map coverage as it relates to certain NGFS scenarios.

2. Ally analyzed the potential for loss due to sequential weather events of increased intensity as a result of climate change. The scenario considered the potential impacts to Ally facilities in the area of the event, both operational and financial, assuming availability of Ally provided insurance (and potential for associated losses) and without insurance.

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 Ally's strategy for 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. In 2022, Ally organized ideation sessions with leaders to educate them on the topic of environmental sustainability and green products and services innovation (e.g., recycled plastic debit and credit cards). Ally continues to collaborate across the enterprise and assess climate-related opportunities based on existing and emerging product lines broadly available to financial institutions. Examples include: - Ally Invest Advisors' risk tolerance questionnaire and onboarding for its Robo Portfolio product asks prospective clients 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 - Ally Dealer Financial Services has loan products available to assist dealerships with their electric vehicle infrastructure needs - Ally Insurance expanded and enhanced the product suite to include a launch of EV-specific vehicle service contract (VSC), to provide coverage for EV drivers. Ally's Major Guard EV offers an extra layer of coverage for electric and plug-in hybrid engines, climate control, braking systems, liquid thermal battery management, battery energy control modules and other EV-specific components.

	Have climate-related risks and opportunities influenced your strategy in this area?	Description of influence
Supply chain and/or value chain	Yes	Ally continues 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 2022, Ally began laying the groundwork for a sustainable procurement program and made the strategic decision to develop a Supplier Code of Conduct, which will include environmental and social considerations for suppliers. As the program matures, Ally will initiate efforts focused on supply chain decarbonization to take meaningful action towards combatting climate change. Ally has a dedicated resource within the Supplier Diversity team focused on the supplier engagement and strategic development necessary to achieve these efforts. Additionally, Ally completed a Request for Information (RFI) for a solution to help assess and manage the ESG/ Sustainability performance of Ally's suppliers. This third-party tool will enhance monitoring capabilities and track exposure to ESG related risks. Upon completion of the RFI in Q4, Ally launched a formal Request for Proposal (RFP) process to inform future strategic planning and investment decisions.
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	Climate-related risks and opportunities have influenced Ally's 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. Ally 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. Leveraging the initial findings from the TCFD analysis, in 2022, Ally focused on delivering more sustainable operations and developing reduction strategies that align with the recommendations from the TCFD and improve its environmental performance metrics. Ally conducted a focused energy study of one of its owned sites, prior to commencing renovations. This study resulted in the approval of direct capital investment to replace an existing gas-powered HVAC system to a more efficient electric system and reduce overall emissions. Additionally, Ally completed a preliminary solar array feasibility study of all owned sites, to explore the potential to implement on-site renewable energy sources.

C3.4

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

	Financial planning elements that have been influenced	Description of influence
Row 1	Revenues Capital Expenditures Liabilities	Capital Expenditures: Climate-related risks and opportunities are considered in Ally's financial planning process for capital expenditures to facilitate sustainable operations of Ally-owned sites. In 2022, Ally conducted a focused energy study of one of our owned sites, prior to commencing renovations. This study resulted in direct capital investment to replace an existing gas-powered HVAC system to a more efficient electric system and reduce overall emissions. A preliminary solar array feasibility study of all owned sites was performed, to explore the potential to implement on-site renewable energy sources. Additionally, in preparation for an anticipated shift in employee vehicle purchase patterns towards more hybrid, plug-in hybrid and electric vehicles, Ally has set a goal to support 2% of all cars parked on Ally owned facilities with access to EV charger capabilities, based on guidance for LEED building efficiency standards and U.S. Green Building Council recommendations. To meet this goal, Ally has incorporated funding into financial planning for all owned sites, with a phased rollout commensurate with demand expectations. Revenues: Climate-related risks and opportunities continue to be considered in Ally's financial planning process for revenues as a result of evaluating shifting consumer patterns towards hybrid, plug-in hybrid and electric vehicles. Ally recognizes the demand and supply of EVs is expected to increase, with the industry projecting electric cars to account for 60% of new car sales by 2030. To make the shift, dealerships may need to make significant infrastructure changes, including the installation of charging stations, upgraded electrical systems, additional inventory space and new car lifts to support the heavier weight of EVs, plus specialized training for staff. In 2022, Ally Dealership Financial Services supported dealers by starting to provide working capital loans to make their facilities EV-ready. Ally also launched vehicle service contracts, specifically for EVs, empowering dealers to provide their EV customers added value.

C3.5

(C3.5) In your organization's financial accounting, do you identify spending/revenue that is aligned with your organization's climate transition?

	Identification of spending/revenue that is aligned with your organization's climate transition
Row 1	No, and we do not plan to in the next two years

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 Ally's business to inform its strategy which will ultimately be incorporated into the policy framework of the organization. Within the next two years, Ally anticipates being in a position to assess inclusion of climate-related requirements and/or exclusion policies into the 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 engagement with external asset managers	Primary reason for not including climate-related requirements in selection process and engagement with external asset managers	Explain why climate-related requirements are not included in selection process and engagement with external asset managers and your plans for the future
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
No, and we do not plan to include climate-related requirements 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	5 year forecast	Please explain
Row 1	We are planning to introduce a target in the next two years	As a digital bank with no brick-and-mortar branches, Ally inherently has a lower carbon footprint and reduced environmental impact than traditional branch based financial institutions. As Ally continues to better understand operational trends for post-COVID operations, Ally will refine its ability to accurately project operational emissions and the potential for emission reduction strategies that will enable Ally to set a relevant and achievable emissions target.	While the completion of Ally's 2022 emissions calculation provides the company with three years of emissions patterns, the company does not yet have a full year of normal business activity information post-COVID. Ally observed an increase in direct emissions in 2022 as the company began to return to normal levels of operations needed to support the business. For example, continued normalization in auto fleet activity is expected over time as supply chain issues resolve and fleet usage returns to more historically consistent levels. Based on more normalized activity levels, Ally is refining its ability to project future emissions over a 5-year period which will enable the company to introduce relevant emissions targets within the next two years. Ally will continue to study and implement other emission targets and reduction initiatives.

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

2022

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

2022

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

100

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

100

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

Target status in reporting year

New

Is this target part of an emissions target?

No

Is this target part of an overarching initiative?

No, it's not part of an overacrching initiative

Please explain target coverage and identify any exclusions

This target covers all electricity consumed by Ally facilities and related operations.

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

On an annual basis, Ally assesses emissions against targeted reduction strategies and sets a new target necessary to maintain operational carbon neutrality.

List the actions which contributed most to achieving this target

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

40

% of target achieved [auto-calculated]

205.2631578947

Target status in reporting year

Achieved

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

No exclusions. The goal applies to all Ally-owned and leased buildings, measured by the total square footage of LEED certified space Ally occupies.

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

List the actions which contributed most to achieving this target

In 2021, Ally developed Design and Construction Guidelines that were successfully implemented across owned and leased

buildings in 2022. As a result, Ally exceeded its goal of 30% of the Ally portfolio in LEED certified buildings by 2023 and has subsequently revised the goal upwards to 55%.
The Design and Construction Guidelines are the reference tool for high efficiency standards and sustainable product procurement opportunities aimed at reducing excess consumption and enhancing occupant well-being. The Design and Construction Guidelines served as a foundational baseline for incorporating industry best practice standards for sustainable buildings and a starting point for third-party green building certifications.

Target reference number

Oth 2

Year target was set

2022

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 building with a green building certificate

Target denominator (intensity targets only)

Base year

2017

Figure or percentage in base year

40

Target year

2023

Figure or percentage in target year

55

Figure or percentage in reporting year

40

% of target achieved [auto-calculated]

0

Target status in reporting year

New

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

No exclusions. The goal applies to all Ally-owned and leased buildings, measured by the total square footage of LEED certified space Ally occupies.

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

Incorporation of sustainability criteria into Ally's operations and maintenance of existing building space.
Ally will continue to leverage the Design and Construction Guidelines, as the reference tool for high efficiency standards and sustainable product procurement opportunities aimed at reducing excess consumption and enhancing occupant well-being. The Design and Construction Guidelines serve as a foundational baseline for incorporating industry best practice standards for sustainable buildings and a 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.

Yes

C4.3a

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

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Under investigation	2	
To be implemented*	0	0
Implementation commenced*	0	0
Implemented*	2	1,330

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Not to be implemented	0	

C4.3b

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

Initiative category & Initiative type
Energy efficiency in buildings
Heating, Ventilation and Air Conditioning (HVAC)

Estimated annual CO2e savings (metric tonnes CO2e)

1,232

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

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

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

321,322

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

2,000

Payback period

<1 year

Estimated lifetime of the initiative

Ongoing

Comment

After a review of Ally's HVAC operations at Ally's largest facility in Charlotte, efficiency and run-time adjustments were made to the HVAC systems to reduce energy usage and associated emissions.

Initiative category & Initiative type

Energy efficiency in buildings
Heating, Ventilation and Air Conditioning (HVAC)

Estimated annual CO2e savings (metric tonnes CO2e)

98

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

Scope 2 (location-based)

Voluntary/Mandatory

Voluntary

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

25,496

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

0

Payback period

<1 year

Estimated lifetime of the initiative

Ongoing

Comment

After review of occupancy at Ally's largest facility in Charlotte, 1 floor of 25 was closed and kept in a low energy consumption state to reduce energy usage and associated emissions.

C4.3c

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

Method	Comment
Dedicated budget for other emissions reduction activities	
Employee engagement	

C-FS4.5

(C4.5) 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?

No

C5.1b

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

Change(s) in methodology, boundary, and/or reporting year definition?	Details of methodology, boundary, and/or reporting year definition change(s)
Yes, a change in methodology	Ally's methodology for calculating Scope 1 emissions from fleet vehicles has improved as a result of increased engagement with the company's fleet management supplier to obtain more detailed, and higher quality, data. This increased data availability enables Ally to use the fuel-based method instead of the distance-based method that was used previously. Additionally, Ally has expanded its coverage of overall fleet emissions to include a small number of Canadian vehicles. While not a material part of Ally's Scope 3 emissions, Ally has begun measuring Scope 3 category 7 emissions from employee commuting due to alignment with business objectives and the company's continued commitment to expand emissions measurement and data quality. Ally will restate base year (2020) and 2021 emissions in accordance with the company's base year recalculation policy referenced in question C5.1c.

C5.1c

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

Base year recalculation	Scope(s) recalculated	Base year emissions recalculation policy, including significance threshold	Past years' recalulation
Yes	Scope 1 Scope 3	As part of Ally's inventory management program, the company will recalculate emissions if the variance exceeds a quantitative significance threshold of 5%, in line with guidance provided within the Greenhouse Gas Protocol. If the quantitative impact is lower than 5%, Ally may restate emissions, based on management discretion and alignment with business objectives and transparency. If information is unavailable, we will recalculate emissions with the most recent year of a complete data set.	Yes

C5.2

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

	Base year start	Base year end	Base year emissions (metric tons CO2e)
Scope 1	January 1, 2020	December 31, 2020	4,139
Scope 2 (location-based)	January 1, 2020	December 31, 2020	7,822
Scope 2 (market-based)	January 1, 2020	December 31, 2020	0
Scope 3 category 1: Purchased goods and services	January 1, 2020	December 31, 2020	195,082
Scope 3 category 2: Capital goods	January 1, 2020	December 31, 2020	27,694
Scope 3 category 6: Business travel	January 1, 2020	December 31, 2020	1,824
Scope 3 category 7: Employee commuting	January 1, 2020	December 31, 2020	4,565

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
The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard
US EPA Emissions & Generation Resource Integrated Database (eGRID)

C6. Emissions data

C6.1

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

	Gross global Scope 1 emissions (metric tons CO2e)	Start date	End date
Reporting year	5,494	January 1, 2022	December 31, 2022

	Gross global Scope 1 emissions (metric tons CO2e)	Start date	End date
Past year 1	4,442	January 1, 2021	December 31, 2021

C6.2

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

Scope 2, location-based	Scope 2, market-based	Comment
We are reporting a Scope 2, location-based figure	We are reporting a Scope 2, market-based figure	To achieve carbon neutrality, Ally engaged Climate Action 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 CO2e?

Reporting year

Scope 2, location-based

10,019

Scope 2, market-based (if applicable)

0

Start date

January 1, 2022

End date

December 31, 2022

C6.4

(C6.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 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, Scope 2, or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure.

Source of excluded emissions

Fugitive emissions from refrigerants

Scope(s) or Scope 3 category(ies)

Emissions are not relevant

Explain why this source is excluded

Refrigerant data is not currently available for Ally operated facilities. Emissions from refrigerants were determined to be de minimis based on an assessment of facilities. As Ally continues to develop its data collection capabilities, inclusion of fugitive emissions will be re-assessed for inclusion in the future.

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 CO2e)

164,924

Emissions calculation methodology

Spend-based method

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

0

Please explain

Ally assessed procurement spend on purchased goods and services. All spend was categorized into NAICS industry sectors and assigned an emissions factor from 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 CO2e)

8,297

Emissions calculation methodology

Spend-based method

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

0

Please explain

Ally assessed procurement spend on capital goods. All spend was categorized into NAICS industry sectors and assigned an emissions factor from 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

Based on Ally's annual screening results from the World Resources Institute (WRI) Scope 3 Evaluator tool, fuel and energy related activities are not a material portion of Scope 3 emissions because of the nature of Ally's operations as a financial services company.

Upstream transportation and distribution

Evaluation status

Not relevant, explanation provided

Please explain

Based on Ally's annual screening results from the World Resources Institute (WRI) Scope 3 Evaluator tool, upstream transportation and distribution is not a material portion of Scope 3 emissions because of the nature of Ally's operations as a financial services company.

Waste generated in operations

Evaluation status

Not relevant, explanation provided

Please explain

Based on Ally's annual screening results from the World Resources Institute (WRI) Scope 3 Evaluator tool, waste generated in operations is not a material portion of Scope 3 emissions because of the nature of Ally's operations as a financial services company with no physical brick and mortar storefronts.

Business travel

Evaluation status

Relevant, calculated

Emissions in reporting year (metric tons CO2e)

6,312

Emissions calculation methodology

Hybrid method
Average data method
Fuel-based method
Distance-based method

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

99

Please explain

Based on Ally's annual screening results from the World Resources Institute (WRI) Scope 3 Evaluator tool, business travel is not a material portion of our Scope 3 emissions; however, Ally chose to calculate and disclose this category based on management discretion and alignment with business objectives.

Ally calculated emissions from business travel by flight mode (defined as short, medium, and long haul), rail, rental cars, ride-share/taxis, private jet, and hotel stays from data provided by travel vendors. We utilized the EPA Emission Factors 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 emissions associated with hotel stays.

Employee commuting

Evaluation status

Relevant, calculated

Emissions in reporting year (metric tons CO2e)

7,377

Emissions calculation methodology

Distance-based method

Please explain

Based on Ally's annual screening results from the World Resources Institute (WRI) Scope 3 Evaluator tool, employee commuting

is not a material portion of our Scope 3 emissions; however, Ally chose to calculate and disclose this category based on management discretion and alignment with business objectives.

Occupancy data was used from employee badging technology and commuting distance was calculated from employee residence to corresponding primary office location. Assumptions for commuting patterns by mode were gathered from The Census Bureau American Community Survey (ACS). Emission factors were gathered from the EPA Emission Factors Hub.

Upstream leased assets

Evaluation status

Not relevant, explanation provided

Please explain

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

Downstream transportation and distribution

Evaluation status

Not relevant, explanation provided

Please explain

Based on Ally's annual screening results from the World Resources Institute (WRI) Scope 3 Evaluator tool, downstream transportation and distribution is not a material portion of Scope 3 emissions because of the nature of Ally's operations as a financial services company.

Processing of sold products

Evaluation status

Not relevant, explanation provided

Please explain

Based on Ally's annual screening results from the World Resources Institute (WRI) Scope 3 Evaluator tool, processing of sold products is not a material portion of Scope 3 emissions because of the nature of Ally's operations as a financial services company that does not produce physical products.

Use of sold products

Evaluation status

Not relevant, explanation provided

Please explain

Based on Ally's annual screening results from the World Resources Institute (WRI) Scope 3 Evaluator tool, use of sold products is not a material portion of Scope 3 emissions because of the nature of Ally's operations as a financial services company that does not produce physical products

End of life treatment of sold products

Evaluation status

Not relevant, explanation provided

Please explain

Based on Ally's annual screening results from the World Resources Institute (WRI) Scope 3 Evaluator tool, use of sold products is not a material portion of Scope 3 emissions because of the nature of Ally's operations as a financial services company that does not produce physical products.

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 the company's Scope 3 emissions as supported by our annual screening.

Based on Ally's annual screening results from the World Resources Institute (WRI) Scope 3 Evaluator tool, downstream leased assets are not a material portion of Scope 3 emissions as Ally does not lease assets to other entities.

Franchises

Evaluation status

Not relevant, explanation provided

Please explain

Based on Ally's annual screening results from the World Resources Institute (WRI) Scope 3 Evaluator tool, franchises are not a material portion of Scope 3 emissions as Ally does not operate any franchises.

C6.5a

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

Start date

January 1, 2021

End date

December 31, 2021

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

177,966

Scope 3: Capital goods (metric tons CO2e)

28,680

Scope 3: Business travel (metric tons CO2e)

2,438

Scope 3: Employee commuting (metric tons CO2e)

966

C6.10

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

Intensity figure

1.34

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

15,513

Metric denominator

full time equivalent (FTE) employee

Metric denominator: Unit total

11,600

Scope 2 figure used

Location-based

% change from previous year

1.11

Direction of change

Decreased

Reason for change

Other, please specify - Return to more normalized business operations

Please explain

A decrease in emissions intensity due to increased headcount was offset slightly by additional miles driven on Ally's leased fleet and higher electricity usage as the company returned to more normalized business operations

Intensity figure

0.00000179

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

15,513

Metric denominator

unit total revenue

Metric denominator: Unit total

8,685,000,000

Scope 2 figure used

Location-based

% change from previous year

5.42

Direction of change

Increased

Reason for change

Change in revenue
Other, please specify - Return to more normalized business operations

Please explain

Ally experienced an increase in emissions intensity primarily from additional miles driven on Ally's leased fleet and higher electricity usage as the company returned to more normalized business operations. Emissions intensity increases were slightly offset by an increase in adjusted net revenue.

Intensity figure

0.00000063

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

5,549

Metric denominator

unit total revenue

Metric denominator: Unit total

8,685,000,000

Scope 2 figure used

Market-based

% change from previous year

19.33

Direction of change

Increased

Reason for change

Change in revenue
Other, please specify - return to more normalized business operations

Please explain

Ally experienced increased emissions intensity primarily from additional miles driven on Ally's leased fleet as the company returned to more normalized business operations. The intensity increase was slightly offset by an increase in revenue.

C7. Emissions breakdowns

C7.7

(C7.7) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

No

C7.9

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

Increased

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 in emissions	Emissions value (percent-age)	Please explain calculation
Change in renewable energy consumption	0	No change	0	Ally purchased 100% renewable energy to neutralize energy usage in 2022. Therefore, we calculate a 0% change.
Other emissions reduction activities	1,051	Increased	23.7	An increase in Scope 1 mobile emissions was due to additional leased vehicle fleet miles driven as business operations return to a more normalized level, offset slightly by reduced stationary fuel combustion. Scope 1 2021 emissions: 4,442 mtCO2e Scope 1 2022 emissions: 5,494 mtCO2e Y/Y change: 1,051 or 23.6%
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		17,793	17,793
Consumption of purchased or acquired electricity		29,958	0	29,958
Total energy consumption		29,958	17,793	47,751

C8.2g

(C9.1) Provide a breakdown by country/area of your non-fuel energy consumption in the reporting year.

Country/area

United States of America

Consumption of purchased electricity (MWh)

29,958

Consumption of self-generated electricity (MWh)

0

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

0

Consumption of self-generated heat, steam, and cooling (MWh)

0

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

29,958

C9. Additional metrics

C9.1

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

C10. Verification

C10.1

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

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

C10.1a

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

Verification or assurance cycle in place

Annual process

Status in the current reporting year

Complete

Type of verification or assurance

Limited assurance

Attach the statement

Ally Financial 2022 - Emissions Verification Statement Limited.pdf

Page/section reference

Verification Opinion Declaration Greenhouse Gas Emissions (Full Document)

Relevant standard

ISO14064-3

Proportion of reported emissions verified (%)

100

C10.1b

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

Scope 2 approach

Scope 2 location-based

Verification or assurance cycle in place

Annual process

Status in the current reporting year

Complete

Type of verification or assurance

Limited assurance

Attach the statement

Ally Financial 2022 - Emissions Verification Statement Limited.pdf

Page/section reference

Verification Opinion Declaration Greenhouse Gas Emissions (Full Document)

Relevant standard

ISO14064-3

Proportion of reported emissions verified (%)

100

Scope 2 approach

Scope 2 market-based

Verification or assurance cycle in place

Annual process

Status in the current reporting year

Complete

Type of verification or assurance

Limited assurance

Attach the statement

Ally Financial 2022 - Emissions Verification Statement Limited.pdf

Page/section reference

Verification Opinion Declaration Greenhouse Gas Emissions (Full Document)

Relevant standard

ISO14064-3

Proportion of reported emissions verified (%)

100

C10.1c

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

Scope 3 category

Scope 3: Purchased goods and services
Scope 3: Capital goods
Scope 3: Business travel
Scope 3: Employee commuting

Verification or assurance cycle in place

Annual process

Status in the current reporting year

Complete

Type of verification or assurance

Limited assurance

Attach the statement

Ally Financial 2022 - Emissions Verification Statement Limited.pdf

Page/section reference

Verification Opinion Declaration Greenhouse Gas Emissions (Full Document)

Relevant standard

ISO14064-3

Proportion of reported emissions verified (%)

100

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 canceled any project-based carbon credits within the reporting year?

Yes

C11.2a

(C11.2a) Provide details of the project-based carbon credits canceled by your organization in the reporting year.

Project type

Reforestation

Type of mitigation activity

Carbon removal

Project description

The project aims to drive large-scale reforestation efforts in the Mississippi Alluvial Valley (MAV) that can help restore the habitat of hundreds of threatened wildlife species and support the economic vitality of hundreds to thousands of private small to medium sized landowners.

The project uses tree planting to establish trees on lands that have been in continuous agricultural use and have not been in a

forested state for at least 10 years. Native hardwoods and Cottonwood trees are interplanted and grown on private lands and protected by conservation easements and diversified economic incentives. Landowners commit to protecting the trees. Limited harvest is allowed after trees grow to the point where crowding of trees is expected to cause some trees to die, but in no case may harvesting occur if it would result in a basal area of live trees of less than 100 square feet per acre after the harvesting.

Throughout the 2022 planting season the GreenTrees Program has enrolled 135,000 acres. GreenTrees is a programmatic offset program and continues to enroll new landowners and plant lands. Independent, third-party verifiers scientifically measure the carbon removed from the atmosphere annually or biannually. Annual or biannual verification and issuance to the American Carbon Registry standard ensures the accuracy and vitality of the project.

Credits canceled by your organization from this project in the reporting year (metric tons CO2e)

5,494

Purpose of cancellation

Voluntary offsetting

Are you able to report the vintage of the credits at cancellation?

Purchased

vintage of credits at cancellation?

2018

Were these credits issued to or purchased by your organization?

Purchased

Credits issued by which carbon-crediting program

ACR (American Carbon Registry)

Method(s) the program uses to assess additionality for this project

Consideration of legal requirements
Investment analysis
Barrier analysis
Market penetration assessment
Other, please specify
Technological barriers: Technological Additionality of the Reforestation Planting Approach and Monitoring Technology. To register, track and verify carbon sequestration value, GreenTrees manages the monitoring process to ACR's standard.

Approach(es) by which the selected program requires this project to address reversal risk

Monitoring and compensation
Other, please specify
Regulatory mechanisms; 20% Buffer Pool; Permanence protection and contingency planting insurance

Potential sources of leakage the selected program requires this project to have assessed

Activity-shifting

Market leakage

Provide details of other issues the selected program requires projects to address

No further issues noted

Comment

The Mississippi River Valley, a vital habitat for migratory birds and numerous plant and animal species, "once supported 24 million acres of floodplain forest, swamps, sloughs and riverine habitat," according to the U.S. Fish and Wildlife Service. 40% of North America's waterfowl and 60% of all bird species migrate along the Mississippi River, although their population has dwindled from habitat loss.

The MAV is now "the Southeast's most deforested region. More than 75% of its forest has been lost since European settlement, mostly to agriculture, and much of the remnant forest occurs in small, isolated tracts of limited conservation value."

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
Yes, other partners in the value chain

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

Type of engagement

Information collection (understanding client behavior)

% 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.

Additionally, as part of onboarding conversations for prospective Wealth Management clients, information is sought by the Wealth Advisor related to the portfolio preferences of the Client. This includes their interest in Impact Portfolios – defined as diversified asset allocation strategies designed for purpose & and impact, such as exposure to environmental, governance and social ("ESG") ETFs. For those interested in those portfolios, the Wealth Advisor includes those specific portfolio types for consideration.

C12.1d

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

Ally's commitment to "Do It Right" extends to the conservation of environmental resources to promote a sustainable future for customers, employees, stockholders and the communities in which the company operates. Ally activated the "Green Teams" initiative, a network of Ally volunteers dedicated to environmental service, which started in 2021 as an opportunity to build community and business education to drive sustainability awareness among Ally employees. In 2022, Ally hosted over 20 internal educational events to bolster awareness of environmental sustainability across the enterprise and through intentional focus across all areas of conservation – land, water use, community impact, air quality, biodiversity and recycling – Ally established several strategic relationships within local communities, hosting innovative programming and volunteer events, resulting in over 2,300 volunteer hours served by Green Teams.

C-FS12.2

(C12.1d) Does your organization exercise voting rights as a shareholder on climate-related issues?

Exercise voting rights as a shareholder on climate-related issues	Primary reason for not exercising voting rights as a shareholder on climate-related issues	Explain why you do not exercise voting rights on climate-related issues
No, and we do not plan to in the next two years	Important but not an immediate priority	As Ally has not set targets or guidelines on climate-related issues for the company's portfolio, Ally is not prepared to exercise voting rights on these issues. As Ally continues to study climate-related issues within the portfolio, the company will evaluate opportunities to exercise voting rights in the future.

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?

External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the climate

Yes, our membership of/engagement with trade associations could influence policy, law, or regulation that may impact the climate

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 external engagement activities are consistent with your climate commitments and/or climate transition plan

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 is a member of, or 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 policy consistent with theirs?

Consistent

Has your organization attempted to influence their position in the reporting year?

No, we did not attempt to influence their position

Describe how your organization's position is consistent with or differs from the trade association's position, and any actions taken to influence their position

Ally is a participant in various industry forums that are engaging with regulators and other key policy makers to help inform on-going 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 (currency as selected in C0.4)

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?

Yes, we have evaluated, and it is aligned

Trade association

Other, please specify
The Bank Policy Institute (BPI)

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

Consistent

Has your organization attempted to influence their position in the reporting year?

No, we did not attempt to influence their position

Describe how your organization's position is consistent with or differs from the trade association's position, and any actions taken to influence their position

Ally is a participant in various industry forums that are engaging with regulators and other key policy makers to help inform on-going 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 (currency as selected in C0.4)

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?

Yes, we have evaluated, and it is aligned

Trade association

Other, please specify
Risk Management Association (RMA)

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

Consistent

Has your organization attempted to influence their position in the reporting year?

No, we did not attempt to influence their position

Describe how your organization's position is consistent with or differs from the trade association's position, and any actions taken to influence their position

Ally is a participant in various industry forums that are engaging with regulators and other key policy makers to help inform on-going 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 (currency as selected in C0.4)

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?

Yes, we have evaluated, and it is aligned

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).

Publication

In mainstream reports

Status

Complete

Attach the document

Ally 2022 Annual Report.pdf

Page/Section reference

Environmental Sustainability (20-21); Form 10-K: Climate-Related Risk (93)

Content elements

Strategy
Risks & opportunities
Other metrics

Comment

Publication

In other regulatory filings

Status

Complete

Attach the document

Ally 2023 Proxy statement.pdf

Page/Section reference

Message from the CEO (2); Board Governance Matters (16); Corporate Social Responsibility (21-22)

Content elements

Strategy
Risks & opportunities
Other metrics

Comment

Publication

In voluntary sustainability report

Status

Complete

Attach the document

Ally 2022 Corporate Social Responsibility Report.pdf

Page/Section reference

Message from the CEO (4); 2022 Highlights (9); Environmental Sustainability (39-46)

Content elements

Strategy
Risks & opportunities
Emissions figures
Other metrics

Comment

C12.5

(C12.5) Indicate the collaborative frameworks, initiatives and/or commitments related to environmental issues for which you are a signatory/member.

Environmental collaborative framework, initiative and/or commitment

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, but we 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

While Ally has begun initial assessments of its portfolio exposure and financed emissions, Ally continues to refine the approach and improve data quality and expect to be able to externally report this information within the next two years.

Lending to coal

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

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

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

While Ally has begun initial assessments of its portfolio exposure and financed emissions, Ally continues to refine the approach and improve data quality and expect to be able to externally report this information within the next two years.

Lending to oil and gas

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

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

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

While Ally has begun initial assessments of its portfolio exposure and financed emissions, Ally continues to refine the approach and improve data quality and expect to be able to externally report this information within the next two years.

Investing in all carbon-related assets (Asset manager)

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

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

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

While Ally has begun initial assessments of its portfolio exposure and financed emissions, Ally continues to refine the approach

and improve data quality and expect to be able to externally report this information within the next two years.

Investing in coal (Asset manager)

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

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

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

While Ally has begun initial assessments of its portfolio exposure and financed emissions, Ally continues to refine the approach and improve data quality and expect to be able to externally report this information within the next two years.

Investing in oil and gas (Asset manager)

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

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

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

While Ally has begun initial assessments of its portfolio exposure and financed emissions, Ally continues to refine the approach and improve data quality and expect to be able to externally report this information within the next two years.

Investing all carbon-related assets (Asset owner)

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

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

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

While Ally has begun initial assessments of its portfolio exposure and financed emissions, Ally continues to refine the approach and improve data quality and expect to be able to externally report this information within the next two years.

Investing in coal (Asset owner)

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

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

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

While Ally has begun initial assessments of its portfolio exposure and financed emissions, Ally continues to refine the approach and improve data quality and expect to be able to externally report this information within the next two years.

Investing in oil and gas (Asset owner)

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

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

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

While Ally has begun initial assessments of its portfolio exposure and financed emissions, Ally continues to refine the approach and improve data quality and expect to be able to externally report this information within the next two years.

Insuring all carbon-related assets

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

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

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

While Ally has begun initial assessments of our insurance exposure to carbon-related assets, Ally continues to refine the approach and improve our data quality and expect to be able to externally report this information within the next two years.

Insuring coal

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

Yes

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

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

0

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

Details of calculation

Ally does not currently provide insurance for any assets related to the coal industry.

Insuring oil and gas

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

Yes

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

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

0

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

Details of calculation

Ally does not currently provide insurance for any assets related to the oil and gas industry.

C-FS14.1

(C-FS14.1) DoDoes your organization measure its portfolio impact 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	Ally performed a portfolio-level screening as of December 2022 to identify which Scope 3 activities throughout the value chain were relevant and material. Ally 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 the company. Ally is currently analyzing this category using relevant methodologies published by the Partnership for Carbon Accounting Financials and will continue to expand its analysis as additional methodologies become available

	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
Investing (Asset manager)	No, but we plan to do so in the next two years	Ally performed a portfolio-level screening as of December 2022 to identify which Scope 3 activities throughout the value chain were relevant and material. Ally 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 the company. Ally is currently analyzing this category using relevant methodologies published by the Partnership for Carbon Accounting Financials and will continue to expand its analysis as additional methodologies become available.
Investing (Asset owner)	No, but we plan to do so in the next two years	Ally performed a portfolio-level screening as of December 2022 to identify which Scope 3 activities throughout the value chain were relevant and material. Ally 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 the company. Ally is currently analyzing this category using relevant methodologies published by the Partnership for Carbon Accounting Financials and will continue to expand its analysis as additional methodologies become available.
Insurance underwriting (Insurance company)	No, but we plan to do so in the next two years	Ally performed a portfolio-level screening as of December 2022 to identify which Scope 3 activities throughout the value chain were relevant and material. Ally 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. Ally is currently analyzing this category using relevant methodologies published by the Partnership for Carbon Accounting Financials and will continue to expand its analysis as additional methodologies become available.

C-FS14.3

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

	Actions taken to align our portfolio with a 1.5°C world	Please explain why you have not taken any action to align your portfolio with a 1.5°C world
Banking (Bank)	No, but we plan to do so in the next two years	At this time, Ally has not had the opportunity to create a targeted action strategy to align its 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.

	Actions taken to align our portfolio with a 1.5°C world	Please explain why you have not taken any action to align your portfolio with a 1.5°C world
Investing (Asset manager)	No, but we plan to do so in the next two years	At this time, Ally has not had the opportunity to create a targeted action strategy to align its 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 do so in the next two years	At this time, Ally has not had the opportunity to create a targeted action strategy to align its 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 do so in the next two years	At this time, Ally has not had the opportunity to create a targeted action strategy to align its 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

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

No, and we do not plan to do so within the next two years

C15.3

(C15.3) Does your organization assess the impacts and dependencies of its value chain on

biodiversity?

Impacts on biodiversity

Indicate whether your organization undertakes this type of assessment

No, and we do not plan to do so within the next two years

Dependencies on biodiversity

Indicate whether your organization undertakes this type of assessment

No and we don't plan to within the next two years

C15.4

(C15.4) Does your organization have activities located in or near to biodiversity- sensitive areas in the reporting year?

Not assessed

C15.5

(C15.5) 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?

No, and we do not plan to undertake any biodiversity-related actions

C15.6

(C15.6) Does your organization use biodiversity indicators to monitor performance across its activities?

No

C15.7

(C15.7) 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).

No

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 one	Chief Executive Officer (CEO)	Chief Executive Officer (CEO)

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 the organization may be potentially impacted by forest and water related issues. Ally inherently incorporates climate related risks into risk management processes. Ally intends to evolve 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.

	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
Water	No, but we plan to within the next two years	Ally recognizes the increasing importance of assessing the ways that the organization may be potentially impacted by forest and water related issues. Ally inherently incorporates climate related risks into risk management processes. Ally intends to evolve 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 its 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

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 its 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.

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.

Position or committee

Chief Executive Officer (CEO)

Issue area(s)

Forests
Water

Forests- and/or water-related responsibilities of this position

Assessing forests- and/or water-related risks and opportunities
Managing forests- and/or water-related risks and opportunities

Coverage of responsibilities

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

Reporting line

Reports to the Board directly

Frequency of reporting to the board on forests- and/or water-related issues via this reporting line

As important matters arise

Please explain

Position or committee

Chief Risks Officer (CRO)

Issue area(s)

Forests
Water

Forests- and/or water-related responsibilities of this position

Assessing forests- and/or water-related risks and opportunities
Managing forests- and/or water-related risks and opportunities

Coverage of responsibilities

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

Reporting line

CEO reporting line

Frequency of reporting to the board on forests- and/or water-related issues via this reporting line

As important matters arise

Please explain

Position or committee

Other C-Suite Officer, please specify
(Chief Administrative Officer)

Issue area(s)

Forests
Water

Forests- and/or water-related responsibilities of this position

Assessing forests- and/or water-related risks and opportunities
Managing forests- and/or water-related risks and opportunities

Coverage of responsibilities

Reporting line

CEO reporting line

Frequency of reporting to the board on forests- and/or water-related issues via this reporting line

Not reported to the board

Please explain

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	Ally has not had the opportunity to evaluate portfolio exposure specifically to forest related issues, however, Ally intends to do so within the next two years. Ally understands the importance of its participation in these activities and is working towards that goal.
Banking – Water exposure	No, but we plan to within the next two years	Ally has not had the opportunity to evaluate portfolio exposure specifically to water related issues, however, Ally intends to do so within the next two years. Ally understands the importance of its participation in these activities and is working towards that goal.
Investing (Asset manager) – Forests exposure		
Investing (Asset manager) – Water exposure		
Investing (Asset owner) – Forests exposure	No, but we plan to within the next two years	Ally has not had the opportunity to evaluate portfolio exposure specifically to forest related issues, however, Ally intends to do so within the next two years. Ally understands the importance of its 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	Ally has not had the opportunity to evaluate portfolio exposure specifically to water related issues, however, Ally intends to do so within the next two years. Ally understands the importance of its 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	Ally has not had the opportunity to evaluate portfolio exposure specifically to water related issues, however, Ally intends to do so within the next two years. Ally understands the importance of its participation in these activities and is working towards that goal.

	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 – Water-related information	No, and we do not plan to in the next two years	Ally has not had the opportunity to evaluate client/investee risk specifically for water related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.
Investing (Asset manager) – Forests-related information	No, and we do not plan to in the next two years	Ally has not had the opportunity to evaluate client/ investee risk specifically for forests and water related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.
Investing (Asset manager) – Water-related information	No, and we do not plan to in the next two years	Ally has not had the opportunity to evaluate client/investee risk specifically for water related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.
Investing (Asset owner) – Forests-related information	No, and we do not plan to in the next two years	Ally has not had the opportunity to evaluate client/investee risk specifically for forest related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.
Investing (Asset owner) – Water-related information	No, and we do not plan to in the next two years	Ally has not had the opportunity to evaluate client/investee risk specifically for water related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.

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	Ally has not had the opportunity to evaluate risks specifically for forest related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.
Water	No	Not yet evaluated	Ally has not had the opportunity to evaluate risks specifically for water related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.

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	Ally has not evaluated opportunities specifically for forest related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.
Water	No	Not yet evaluated	Ally has not evaluated opportunities specifically for water related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.

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 2022, Ally has not had the opportunity to evaluate forest related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.

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 2022, Ally has not had the opportunity to evaluate water related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.

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

Ally has not had the opportunity to evaluate forest related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.

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

Ally has not had the opportunity to evaluate water related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to

forecast when this will be complete.

FW-FS3.3

(FW-FS3.3) Has your organization set targets for deforestation free and/or water secure lending, investing and/or insuring?

	Targets set	Explain why your organization has not set targets for deforestation free and/or water secure lending, investing and/or insuring and any plans to address this in the future
Forests	No, and we do not plan to set targets in the next two years	Ally has not had the opportunity to evaluate forest related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area, however, at this time Ally is not able to forecast when this will be complete.
Water Security	No, and we do not plan to set targets in the next two years	Ally has not had the opportunity to evaluate forests related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area, however, at this time Ally is not able to forecast when this will be complete.

FW-FS3.4

(FW-FS3.4) Do any of your existing products and services enable clients to mitigate deforestation and/or water insecurity?

	Existing products and services that enable clients to mitigate deforestation and/or water insecurity	Explain why your organization does not offer products and services which enable clients to mitigate deforestation and/or water insecurity and any plans to address this in the future
Forests	No, and we do not plan to address this in the next two years	Ally has not had the opportunity to evaluate opportunities specifically for forest related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.
Water	No, and we do not plan to address this in the next two years	Ally has not had the opportunity to evaluate opportunities specifically for water related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.

FW-FS3.5

(FW-FS3.5) Does the policy framework for the portfolio activities of your organization include forests- and/or water-related requirements that clients/investees need to meet?

	Policy framework includes this issue area	Explain why your organization does not include this issue area in the policy framework and any plans to address this in the future
Forests	No, and we do not plan to include this issue area in the next two years	Ally has not had the opportunity to evaluate issues specifically for forest related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.
Water	No, and we do not plan to include this issue area in the next two years	Ally has not had the opportunity to evaluate issues specifically for water related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.

FW-FS3.6

(FW-FS3.6) 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 include this issue area in the next two years	Ally has not had the opportunity to evaluate issues specifically for forest related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.
Water	No, and we do not plan to include this issue area in the next two years	Ally has not had the opportunity to evaluate issues specifically for water related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.

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	Ally has not had the opportunity to evaluate opportunities specifically for forest related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.
Clients – Water	No, and we do not plan to in the next two years	Ally has not had the opportunity to evaluate opportunities specifically for water related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.

	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
Investees – Forests	No, and we do not plan to in the next two years	Ally has not had the opportunity to evaluate opportunities specifically for forest related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.
Investees – Water	No, and we do not plan to in the next two years	Ally has not had the opportunity to evaluate opportunities specifically for water related issues. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.

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	Ally has not had the opportunity to assess its exposure and therefore have not had the opportunity to make informed shareholder decisions. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.
Water	No, and we do not plan to in the next two years	Ally has not had the opportunity to assess its exposure and therefore have not had the opportunity to make informed shareholder decisions. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.

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
No, and we do not plan to in the next two years	Not a strategic focus	Given Ally's current business model, Ally has not identified an opportunity to provide financing and/or insurance to smallholders in the agricultural commodity supply chain. Ally understands the importance of its participation in these activities and will continue to evaluate opportunities for improvement in this area; however, at this time Ally is not able to forecast when this will be complete.

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?

	External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact this issue area
Forests	Yes, our membership of/engagement with trade associations could influence policy, law, or regulation that may impact this issue area
Water	Yes, our membership of/engagement with trade associations could influence policy, law, or regulation that may impact this issue 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	Ally understands the importance of portfolio impact on forests. Ally does not currently have data available to measure its impact but will continue to monitor opportunities in the future; however, at this time Ally is not able to forecast when this will be complete.
Banking – Impact on Water	No, and we don't plan to in the next two years	Important but not an immediate priority	Ally understands the importance of portfolio impact on water security. Ally does not currently have data available to measure its impact but will continue to monitor opportunities in the future; however, at this time Ally is not able to forecast when this will be complete.
Investing (Asset manager) – Impact on Forests			
Investing (Asset manager) – Impact on Water			
Investing (Asset owner) – Impact on Forests	No, and we don't plan to in the next two years	Important but not an immediate priority	Ally understands the importance of portfolio impact on forests. Ally does not currently have data available to measure its impact but will continue to monitor opportunities in the future; however, at this time Ally is not able to forecast when this will be complete.
Investing (Asset owner) – Impact on Water	No, and we don't plan to in the next two years	Important but not an immediate priority	Ally understands the importance of portfolio impact on water security. Ally does not currently have data available to measure its impact but will continue to monitor opportunities in the future; however, at this time Ally is not able to forecast when this will be complete.

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 understands the importance of portfolio impact on forests. Ally does not currently have data available to measure its impact but will continue to monitor opportunities in the future; however, at this time Ally is not able to forecast when this will be complete.
Lending to companies operating in the palm oil products supply chain	No		Ally understands the importance of portfolio impact on water security. Ally does not currently have data available to measure its impact but will continue to monitor opportunities in the future; however, at this time Ally is not able to forecast when this will be complete.
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		Ally understands the importance of portfolio impact on forests. Ally does not currently have data available to measure its impact but will continue to monitor opportunities in the future; however, at this time Ally is not able to forecast when this will be complete.
Lending to companies operating in the cocoa supply chain	No	Important but not an immediate priority	Ally understands the importance of portfolio impact on water security. Ally does not currently have data available to measure its impact but will continue to monitor opportunities in the future; however, at this time Ally is not able to forecast when this will be complete.

	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
Investing (asset manager) to companies operating in the coffee supply chain	No		
Investing (asset owner) 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 has begun assessing lending exposure to companies that operate in the timber products supply chain. As new data becomes available, Ally expects the accuracy of this assessment to improve. Ally understands the importance of assessing its exposure and plans to disclose these amounts in the next two years.
Investing (asset owner) to companies operating in the palm oil products supply chain	No		
Investing (asset owner) to companies operating in the cattle products supply chain	No		
Investing (asset owner) to companies operating in the soy supply chain	No		
Investing (asset owner) to companies operating in the rubber supply chain	No		
Investing (asset owner) to companies operating in the cocoa supply chain	No		

	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
Investing (asset owner) 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).

Focus of the Publication

Publication

No publications

Status

Attach the document

Page/Section reference

Content elements

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